



Mitigated Negative Declaration

4802 - 4828 San Vicente Self-Storage Facility Project

Case Number: CPC-2025-5194-HD-CU2-PR-ZC

Environmental Number: ENV-2025-5195-MND

Project Location: 4802-4828 W. San Vicente Boulevard, Los Angeles, CA 90019

Community Plan Area: Wilshire

Council District: 10 – Heather Hutt

Project Description: The Project involves the demolition and removal of the existing one-story warehouse building and two (2) surface parking lots for the construction, use, and maintenance of a seven-story self-storage facility for household goods encompassing a floor area of 161,645 square feet. The self-storage facility would feature storage units across each floor level, a 954-square-foot office area, five (5) vehicular parking spaces, 36 bicycle parking spaces, and two (2) loading spaces and would operate between 6:00 a.m. to 11:00 p.m., daily. Along the adjoining streets (San Vicente Boulevard, Longwood Avenue, and Tremaine Avenue) are five (5) non-protected street trees. The Project would remove two (2) street trees along South Longwood Avenue and replace them to the satisfaction of the Department of Public Works Urban Forestry Division. The Project Site does not contain any on-site trees. In total, the Project proposes the planting of eight (8) trees.

Discretionary entitlements, reviews, permits and approvals required to implement the Project include, but are not limited to, the following:

- **Zone Change/Height District Change (ZC/HD)**, per LAMC Chapter 1A Section 13B.1.4, from the C2-1-O Zone to the C2-2-O Zone in order to permit additional floor area up to a maximum Floor Area Ratio of 6:1 in lieu of 1.5:1; including
 - **A waiver of the requirement** to dedicate and/or improve an additional 2.5 feet of the existing public alley;
 - **A waiver of the requirement** to improve an additional 3 feet of street widening along South Longwood Avenue;
- **Class 2 Conditional Use Permit (CU2)**, per LAMC Chapter 1A Section 13.B.2.2, to permit storage uses within 500 feet of a R Zone; and
- **Project Review (PR)**, pursuant to LAMC Chapter 1A Section 13B.2.4, for a proposed development project that results in an increase of 50,000 gross square feet of non-residential floor area.

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Department of City Planning

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March 2026

Table of Contents

<u>Section</u>	<u>Page</u>
1 Introduction	1-1
2 Executive Summary	2-1
3 Project Description.....	3-1
4 Environmental Impact Analysis.....	4-1
Aesthetics	4-1
Agriculture and Forestry Resources	4-14
Air Quality	4-17
Biological Resources	4-25
Cultural Resources	4-29
Energy.....	4-34
Geology and Soils.....	4-45
Greenhouse Gas Emissions	4-50
Hazards and Hazardous Materials.....	4-58
Hydrology and Water Quality	4-66
Land Use and Planning.....	4-72
Mineral Resources	4-84
Noise.....	4-86
Population and Housing.....	4-94
Public Services	4-96
Recreation.....	4-102
Transportation.....	4-104
Tribal Cultural Resources	4-109
Utilities and Service Systems.....	4-112
Wildfire	4-132
Mandatory Findings of Significance	4-134
5 Preparers and Persons Consulted.....	5-1
 <u>Figures</u>	
3-1 Regional Location Map	3-2
3-2 Aerial Map.....	3-3
3-3 Site Plan	3-8

<u>Tables</u>	<u>Page</u>
3-1 Public Transit.....	3-6
3-2 Project Site Data.....	3-7
3-3 Project Floor Area.....	3-9
3-4 Vehicle Parking.....	3-11
3-5 Bicycle Parking.....	3-12
3-6 Construction Schedule.....	3-14
4.1-1 Project Consistency with City of Los Angeles General Plan Framework Element.....	4-4
4.3-1 Regional Construction Emissions.....	4-20
4.3-2 Localized Construction Emissions.....	4-21
4.3-3 Regional Operations Emissions.....	4-21
4.3-4 Localized Operation Emissions.....	4-22
4.8-1 Estimated Project Construction GHG Emissions.....	4-53
4.8-2 Estimated Project Operational GHG Emissions.....	4-53
4.8-3 Project Consistency with the 2022 Scoping Plan.....	4-54
4.8-4 Project Consistency with the Green New Deal.....	4-56
4.11-1 Project Consistency with the City of Los Angeles General Plan.....	4-74
4.11-2 Project Consistency with the Wilshire Community Plan.....	4-82
4.13-1 Estimated Construction Noise Levels at Nearest Receptors.....	4-89
4.13-2 Estimated Daytime and Nighttime Exterior Noise Levels.....	4-90
4.13-3 Vibration Source Amplitudes for Construction Equipment.....	4-91
4.13-4 Estimated Construction Vibration Annoyance Levels at Nearest Receptor.....	4-92
4.13-5 Estimated Construction Vibration Damage Levels at Nearest Receptor.....	4-92
4.15-1 Fire Stations.....	4-96
4.15-2 Estimated Student Generation.....	4-99
4.19-1 Project Estimated Water Consumption and Wastewater Generation.....	4-113
4.19-2 Estimated Cumulative Water Consumption and Wastewater Generation.....	4-114
4.19-3 Breakdown of Historical Water Demand for LADWP’s Service Area.....	4-118
4.19-4 Service Area Reliability Assessment (AFY).....	4-118
4.19-5 Water Shortage Response Actions.....	4-119
4.19-6 Landfill Capacity.....	4-126
4.19-7 Project Demolition and Construction Waste Generation.....	4-127
4.19-8 Project Estimated Solid Waste Generation.....	4-128
4.21-1 Related Projects.....	4-135

Appendices

- A** Project Plan Set, KSP Studio Architecture, October 10, 2025
- B** Los Angeles City Planning Form CP-4068 Tree Report, Alison Lancaster, updated November 3, 2025.
- C-1** Air Quality, Energy and Greenhouse Gas Impact Analysis, EPD Solutions, Inc., December 16, 2025.
- C-2** Greenhouse Gas Emissions Regulatory Background, City of Los Angeles, 2025.
- D** Cultural Resources Assessment, BCR Consulting, September 14, 2025.
- E** Geotechnical Engineering Investigation, Norcal Engineering, June 30, 2025.
- F-1** Phase I Environmental Site Assessment, Hazard Management Consulting, February 6, 2025.
- F-2** Phase I Environmental Site Assessment, Hazard Management Consulting, July 10, 2025.
- G** Noise Technical Report and Appendix, LSA, October 2025.
- H** VMT Screening Analysis, EPD Solutions, September 16, 2025.

Section 1

Introduction

An application for the proposed 4802 - 4828 San Vicente Self-Storage Facility (Project) has been submitted to the City of Los Angeles (City) Department of City Planning for discretionary review. The Department of City Planning, as Lead Agency, has determined that the Project is subject to the California Environmental Quality Act (CEQA) and that the preparation of an Initial Study and Mitigated Negative Declaration (IS/MND) is appropriate. Thus, this document has been prepared in compliance with the relevant provisions of CEQA and the State CEQA Guidelines as implemented by the City. As discussed in greater detail throughout this document, the analysis in this IS/ND concludes that with implementation of the identified mitigation measures, the Project would not result in any significant environmental impacts. The IS/MND is an informational document and is required to be adopted by the decision maker prior to Project approval by the City.

1.1 Purpose of an Initial Study

CEQA was enacted in 1970 with several basic purposes, including: (1) to inform governmental decision makers and the public about the potential significant environmental effects of proposed projects; (2) to identify ways that environmental damage can be avoided or significantly reduced; (3) to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of feasible alternatives or mitigation measures¹; and (4) to disclose to the public the reasons behind a project’s approval even if significant environmental effects are anticipated.

An Initial Study is a preliminary analysis conducted by the Lead Agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the Initial Study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, the Lead Agency shall prepare a Negative Declaration. If the Initial Study identifies potentially significant effects but revisions have been made by or agreed to by the applicant that would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, a Mitigated Negative Declaration is appropriate. If the Initial Study concludes that neither a Negative Declaration nor Mitigated Negative Declaration is appropriate, an Environmental Impact Report (EIR) is normally required.²

1.2 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

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

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 the Project would not have a significant effect on the environment. Therefore, an IS/ND was determined to be the appropriate CEQA document.

1.3 Organization of the IS/MND

This IS/MND is organized into five sections and appendices as follows:

1 INTRODUCTION

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

2 EXECUTIVE SUMMARY

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

3 PROJECT DESCRIPTION

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

4 EVALUATION OF ENVIRONMENTAL IMPACTS

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

5 PREPARERS AND PERSONS CONSULTED

Lists the agencies, persons, and technical professionals that were consulted to prepare the IS/MND.

APPENDICES

Includes technical reports, memorandum, and other documentation used in the preparation of the IS/MND.

Section 2

Executive Summary

PROJECT TITLE	4802 - 4828 San Vicente Self-Storage Facility Project
ENVIRONMENTAL CASE NO.	ENV-2025-5195-MND
RELATED CASES	CPC-2025-5194-HD-CU2-PR-ZC

PROJECT LOCATION	4802 - 4828 W. San Vicente Boulevard, Los Angeles, CA 90019
COMMUNITY PLAN AREA	Wilshire
GENERAL PLAN DESIGNATION	Community Commercial
ZONING	C2-1-O
COUNCIL DISTRICT	10 – Heather Hutt

LEAD AGENCY	City of Los Angeles
CITY DEPARTMENT	Los Angeles City Planning
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APPLICANT	Westport Properties
ADDRESS	660 Newport Center Drive, Suite 1450 Newport Beach, CA 92660
PHONE NUMBER	(949) 423-4207

PROJECT DESCRIPTION SUMMARY

The Project includes demolition and removal of the existing warehouse and surface parking from the Project Site and development of the site with a seven-story self-storage facility with approximately 161,645 square feet of floor area (5.28:1 FAR). Discretionary entitlements, reviews, permits and approvals required to implement the Project include, but are not limited to, the following:

- **Zone Change/Height District Change (ZC/HD)**, per LAMC Chapter 1A Section 13B.1.4, from the C2-1-O Zone to a C2-2-O Zone in order to permit additional floor area up to a maximum Floor Area Ratio of 6:1 in lieu of the current 1.5:1; including

- **A waiver of the requirement** to dedicate and/or improve an additional 2.5 feet of the existing public alley;
- **A wavier of the requirement** to improve an additional 3 feet of street widening along South Longwood Avenue;
- **Class 2 Conditional Use Permit (CU2)**, per LAMC Chapter 1A Section 13.B.2.2, to permit storage uses within 500 feet of an R Zone; and
- **Project Review (PR)**, pursuant to LAMC Chapter 1A Section 13B.2.4, for a proposed development project that results in an increase of 50,000 gross square feet of non-residential floor area.

(For additional detail, see **Section 3. Project description** of this document).

ENVIRONMENTAL SETTING SUMMARY

The approximately 0.7-acre (30,612-square-foot) Project Site is located on the south side of San Vicente Boulevard, between Longwood Avenue to the west and Tremaine Avenue to the east, in the Wilshire Community Plan Area of the City of Los Angeles. The Project Site is currently a single-story, 23,151-square-foot warehouse building and two (2) surface parking lots (one (1) along Tremaine Avenue and one (1) along Longwood Avenue). The Project Site is currently designated for Community Commercial land uses and is zoned C2-1-O.

(For additional detail, see **Section 3. Project description** of this document).

OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED

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

At this time no public agencies whose approval is required have been identified.

CALIFORNIA NATIVE AMERICAN CONSULTATION

The City issued a Tribal Consultation on November 20, 2025. Subsequently the Gabrieleno Band of Mission Indians Kizh Nation requested government-to-government consultation with the City of Los Angeles pursuant to Assembly Bill 52 and the California Environmental Quality Act (CEQA).

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission’s Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

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.

(For additional detail see **Section 4, Environmental Impact Analysis** of this document).

- | | | |
|---|--|---|
| <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 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 the Project is a qualified “transit priority project” that satisfies the requirements of Sections 21155 and 21155.2 of the Public Resources Code (PRC), and/or a qualified “residential or mixed use residential project” that satisfies the requirements of Section 21159.28(d) of the PRC, and although the project could have a potentially significant effect on the environment, there will not be a significant effect in this case, because the SUSTAINABLE COMMUNITIES ENVIRONMENTAL ASSESSMENT (SCEA) identifies measures that either avoid or mitigate to a level of insignificance all potentially significant or significant effects of the Project.



PRINTED NAME, TITLE

4/2/26

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) “Less Than Significant With Mitigation Incorporated” applies where the incorporation of a mitigation measure has reduced an effect from “Potentially Significant Impact” to “Less Than Significant Impact.” The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analysis,” as described in (5) below, may be cross referenced).
- 5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are “Less Than Significant With Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whichever format is selected.
- 9) The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significance.

Section 3

Project Description

This section is based on the following item, which is included in **Appendix A** of this document:

A Plans, KSP Studio Architecture, October 10, 2025

3.1 Project Summary

The Project involves the demolition and removal of the existing one-story warehouse building and two (2) associated parking lots and the construction, use, maintenance of a new seven-story self-storage facility encompassing a floor area of 161,645 square feet with a Floor Area Ratio (FAR) of 5.28:1, five (5) vehicle parking spaces, and two (2) loading spaces. The Project would feature storage units across all seven (7) floor levels of the facility and includes a 954-square-foot office area, and 36 bicycle parking spaces (18 short-term, 18 long-term). The Project would remove and replace two (2) of the five (5) street trees located along San Vicente Boulevard and Longwood Avenue to the satisfaction of the Department of Public Works Urban Forestry Division. The Project would provide a total of eight (8) trees upon completion.

3.2 Environmental Setting

3.2.1 Project Location

The Project Site is located on the south side of San Vicente Boulevard, between Longwood Avenue to the west and Tremaine Avenue to the east, in the Wilshire Community Plan Area of the City of Los Angeles (City). The Site is located approximately 4.0 miles west of Downtown Los Angeles and 9.5 miles northeast of the Pacific Ocean.

See **Figure 3-1, Regional Location Map**, for the location within the context of the City.

See **Figure 3-2, Aerial Map**, for an aerial of the Site and the immediate surrounding area.

3.2.2 Surrounding Land Uses

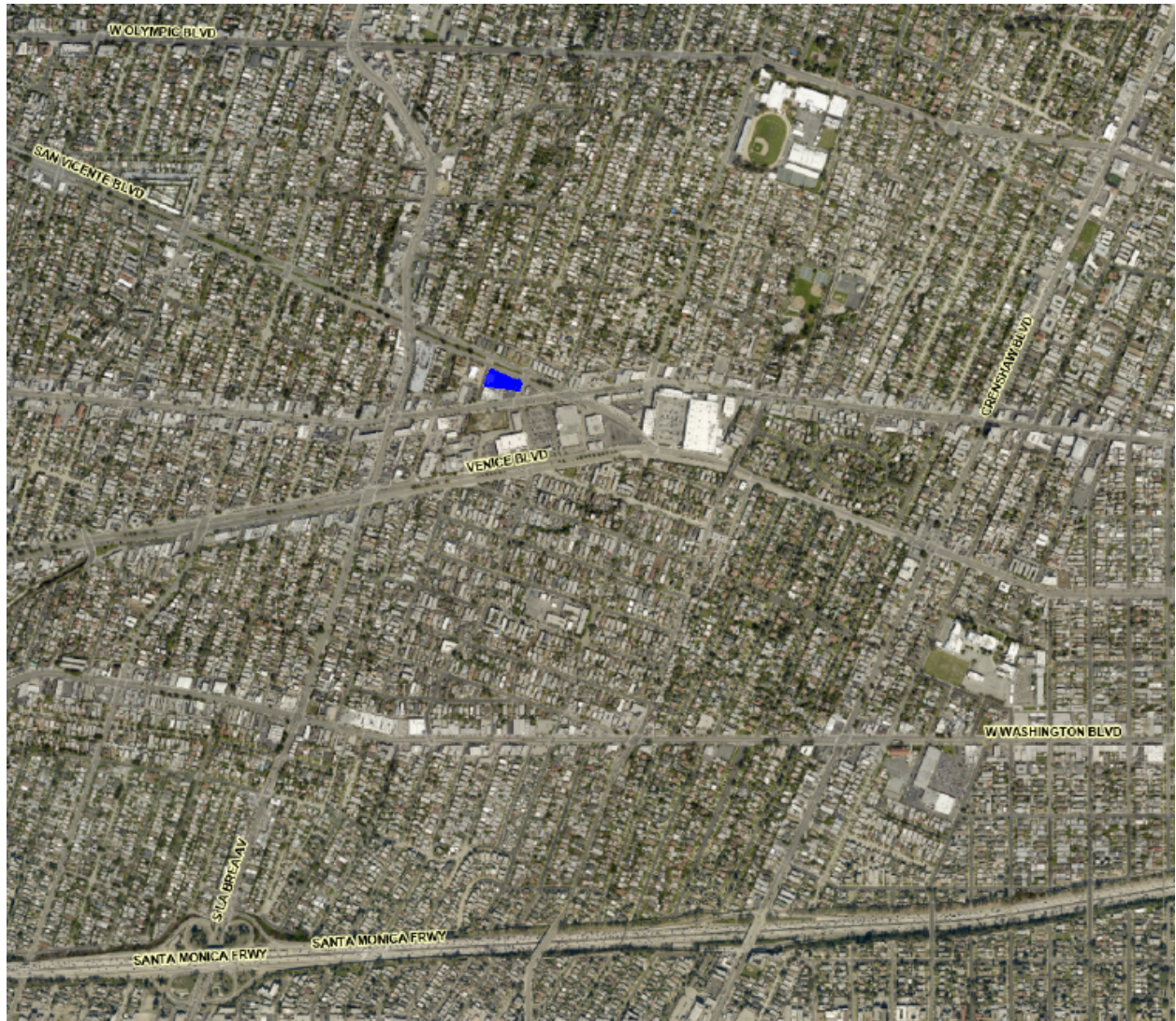
North, across San Vicente Boulevard, are several 2-story multi-family residential-use buildings (4801-4823 San Vicente Boulevard). This area is zoned R3-1-O.

South, across a 15-foot-wide alley, are several one-story commercial warehouse buildings (4801-4831 Pico Boulevard) consisting of photography studios (Edge Studios and Grips, 1388 Longwood Avenue) (Off Pico Studios, 4823 Pico Boulevard) and a grocery store (Western Kosher Supermarket, 4817 Pico Boulevard). This area is zoned C2-1-O.

West, across Longwood Avenue, is a two-story public facility buildings (LADWP Distributing Station 8, 4858 San Vicente Boulevard). This area is zoned PF-1XL-O.

East, across Tremaine Avenue, is an auto service facility (Jiffy Lube, 4777 Pico Boulevard). This area is zoned C2-1-O.

**Figure 3-1
Regional Location Map**



Project Site

**Figure 3-2
Aerial Map**



The nearest residential uses include:

- Multi-family residential-use buildings (4801 - 4823 San Vicente Boulevard), approximately 150 feet north of the Site across San Vicente Blvd.
- Multi-family residential-use buildings (1304 - 1316 Highland Avenue), approximately 225 feet west of the Site across Longwood Avenue and separated by a two-story public facilities building.

The nearest historic resources^{1, 2, 3}:

- Department of Water and Power Distributing Station No. 8, 4858 San Vicente Boulevard, approximately 60 feet west of the Site. The building has been determined significant by the Los Angeles Historic Resources Inventory and is therefore a historical resource under

¹ NavigateLA, Historic-Cultural Monuments layer: <https://navigatea.lacity.org/navigatea>, accessed July 3, 2025.

² HistoricPlacesLA: <https://hpla.lacity.org/search>, accessed July 3, 2025.

³ SurveyLA: <https://planning.lacity.gov/preservation-design/survey-la-results-wilshire>, accessed July 3, 2025.

CEQA. While not currently listed, the property appears eligible for National Register, California Register, and local listing.⁴

- San Vicente Boulevard Median, 55 feet north of the Site. The resource has been determined to be eligible by the Los Angeles Historic Resources Inventory for local listing and is therefore treated as a historical resources under CEQA.⁵

3.2.3 Regional and Local Access

Regional access is provided by:

- I-10 (Santa Monica) Freeway, 5,050 feet south of the Site

Local access is provided by (designation in the Mobility Plan 2035):

- San Vicente Boulevard (Boulevard II), adjacent north of the Site
- Longwood Avenue (Local Street Standard), adjacent west of the Site
- Tremaine Avenue (Local Street Standard), adjacent east of the Site
- Pico Boulevard (Avenue I), 80 feet south of the Site
- La Brea Avenue (Avenue I), 725 feet west of the Site
- Venice Boulevard (Modified Boulevard II), 700 feet south of the Site

3.2.4 Pedestrian Facilities

There is a sidewalk along the Project Site's northern boundary along San Vicente Boulevard, western boundary along Longwood Avenue, and eastern boundary along South Tremaine Avenue. The sidewalk along San Vicente Boulevard contains three (3) street trees and the sidewalk along Longwood Avenue contains two (2) street trees. The Project proposes the removal of the two (2) street trees along Longwood Avenue and will replace them at a 2:1 ratio to the satisfaction of the Urban Forestry Division – Bureau of Street Service.

Crosswalks are provided at all legs of the nearest signalized intersections:

- San Vicente Boulevard and Pico Boulevard, 300 feet east of the Site

3.2.5 Bicycle Facilities

The following bicycle facilities are located nearby:

- Bicycle-friendly streets:

⁴ <https://hpla.lacity.org/report/6d808be7-021c-4589-94d5-5dc8670ac131>, accessed July 3, 2025.

⁵ <https://hpla.lacity.org/report/5e360f3f-4d0d-4842-afa6-fae553eaba2e>, accessed July 3, 2025.

- Pico Boulevard, 80 feet south to the Site
- Bicycle Lane:
 - Class II bicycle lanes on San Vicente Boulevard, adjacent north of the Site
 - Class II bicycle lanes on Venice Boulevard, 700 feet south of the Site

3.2.6 Public Transit

The Site is within a High-Quality Transit Area (HQT), which are areas within one-half mile of a high-quality transit corridor, which is a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.⁶ The City defines peak commute hours as between 6:00 AM and 9:00 AM and between 3:00 PM and 7:00 PM.⁷

Los Angeles County Metropolitan Transportation Authority (Metro), Los Angeles Department of Transportation (LADOT), and City of Santa Monica Big Blue Bus (BBB) operate public transit in the area, as shown in **Table 3-1, Public Transit**.

The Project Site is within 0.5 miles of a qualified Major Transit Stop at the intersection of San Vicente Boulevard and Pico Boulevard, 300 feet east of the Site, which is served by Metro bus line 30 and BBB lines 7 and Rapid 7. The lines have under 20-minute headways during peak hours.⁸ Assembly Bill (AB) 2553 changes the criteria of a Major Transit Stop from a 15-minute to 20-minute bus route service interval.⁹

Based on the Site's proximity to a Major Transit Stop, development at the Site is eligible for reduced parking requirements as may be authorized under AB 2097 (codified in Gov. Code Section 65863.2).

⁶ SCAG, HQT 2016 based on the 2020-2045 RTP/SCS: <https://gisdata-scag.opendata.arcgis.com/datasets/high-quality-transit-areas-hqta-2016-scag-region?geometry=-121.570%2C33.364%2C-114.731%2C34.954>, accessed July 3, 2025.

⁷ TOC Guidelines, Appendix A, page 15, Peak Periods: <https://planning.lacity.gov/odocument/39fae0ef-f41d-49cc-9bd2-4e7a2eb528dd/TOCGuidelines.pdf>, accessed March 13, 2025.

⁸ Major Transit Stop is a site containing a rail station or the intersection of two or more bus routes with a service interval of 20 minutes (per AB 2553) or less during the morning and afternoon peak commute periods. The stations or bus routes may be existing, under construction or included in the most recent Southern California Association of Governments (SCAG) Regional Transportation Plan (RTP).

⁹ AB 2553: https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=202320240AB2553, accessed July 3, 2025.

**Table 3-1
Public Transit**

Line	Type	Direction	Stop	Distance to Site	Service
Metro					
212	Bus	North-south on La Brea	San Vicente	730 feet northwest	10 minutes
30	Bus	East-west on Pico	Rimpau	975 feet east	7.5 minutes
33	Bus	East-west on Venice	Rimpau	665 feet south	7.5 minutes
Big Blue Bus					
7	Bus	East-west on Pico	San Vicente	730 feet east	14 minutes
Rapid 7	Bus	East-west on Pico	San Vicente	730 feet east	20 minutes
LADOT DASH					
Midtown	Bus	East-west on Pico	Tremaine	100 feet southeast	30 minutes
Distance is measured from the closest point on any lot to the entrance(s) of a rail transit station (including elevators and stairways), or the middle of the street intersection of two or more bus routes. Metro 212 schedule (effective June 22, 2025): https://cdn.beta.metro.net/wp-content/uploads/2025/06/20101333/212_TT_6-22-25.pdf Metro 30 schedule (effective June 22, 2025): https://cdn.beta.metro.net/wp-content/uploads/2025/06/20101141/030_TT_06-22-25.pdf Metro 33 schedule (effective June 22, 2025): https://cdn.beta.metro.net/wp-content/uploads/2025/06/20101144/033_TT_06-22-25.pdf BBB 7 schedule (effective April 6, 2025): https://www.bigbluebus.com/Routes-and-Schedules/Route-7.aspx BBB Rapid 7 schedule (effective April 6, 2025): https://www.bigbluebus.com/Routes-and-Schedules/Rapid-7.aspx LADOT DASH Midtown schedule (effective December 2024): https://www.ladottransit.com/dash/routes/midtown/midtown.html					

3.2.7 Planning and Zoning

Table 3-2, Project Site Data, lists the Site's APNs, zoning, and General Plan land use designation. The Site is zoned C2-1-O (Commercial Zone, Height District 1, Oil Drilling Overlay) and Community Commercial land use designation.

The Project Site also is subject to the following relevant Zoning Information (ZI) items:

- ZI-2488 Redevelopment Project Area: Mid City Recovery
- ZI-2535 Prior Housing Element Sites – Ministerial Approval
- ZI-2512 Housing Element Sites
- ZI-2452 Transit Priority Area in the City of Los Angeles
- ZI-2280 Redevelopment Project Area: Mid City Recovery (Billboard)
- ZI-2498 Local Emergency Temporary Regulations – Time Limits and Parking Relief

The Site is identified in a Methane Zone. The Site is identified in the Las Cienegas Oil/Gas Field. The Site is identified in a 500-Year Flood Zone and 100-Year Flood Zone AO.

**Table 3-2
Project Site Data**

Address	Lot	APN	Size (sf)	Zone	Land Use
4828 W. San Vicente Boulevard	FR 660	5070-004-026	3,480.6	C2-1-O	Community Commercial
4826 W. San Vicente Boulevard	FR 661		3,355.7		
4822 W. San Vicente Boulevard	FR 662		3,182.4		
4820 W. San Vicente Boulevard	FR 663		2,998.8		
4818 W. San Vicente Boulevard	FR 664		2,822.4		
4816 W. San Vicente Boulevard	FR 665		2,647.2		
4812 W. San Vicente Boulevard	FR 666		2,469.5		
4810 W. San Vicente Boulevard	FR 667		2,293.9		
4808 W. San Vicente Boulevard	FR 668		2,117.3		
4806 W. San Vicente Boulevard	FR 669		1,940.7		
4804 W. San Vicente Boulevard	FR 670		1,764.1		
4802 W. San Vicente Boulevard	FR 671		1,537.7		
Source: Zone Information & Map Access System (ZIMAS): http://zimas.lacity.org , July 2025.					

3.3 Existing Conditions

The lot area is 30,613 square feet (0.70 acres).¹⁰ The Project Site contains a one-story, 23,151-square-foot warehouse building and two (2) associated surface parking lots (one along Tremaine Avenue and one along Longwood Avenue). There are no on-site trees on the Project site. Two (2) street trees (southern magnolia) are planted along Longwood Avenue, and three (3) street trees (one purple orchid tree and two Japanese privet) are planted along San Vicente Boulevard.¹¹ None are protected tree or shrubs as defined by the City.¹²

3.4 Description Of Project

3.4.1 Project Overview

The Project includes demolition and removal of all existing uses from the Project Site and development of the Site with a new seven-story self-storage facility with approximately 161,645 square feet of floor area (5.28:1 FAR), five (5) vehicle parking spaces, and two (2) loading spaces.

¹⁰ Plans, KSP Studio Architecture, August 27, 2025, updated November 3, 2025. Included in **Appendix A** to document.

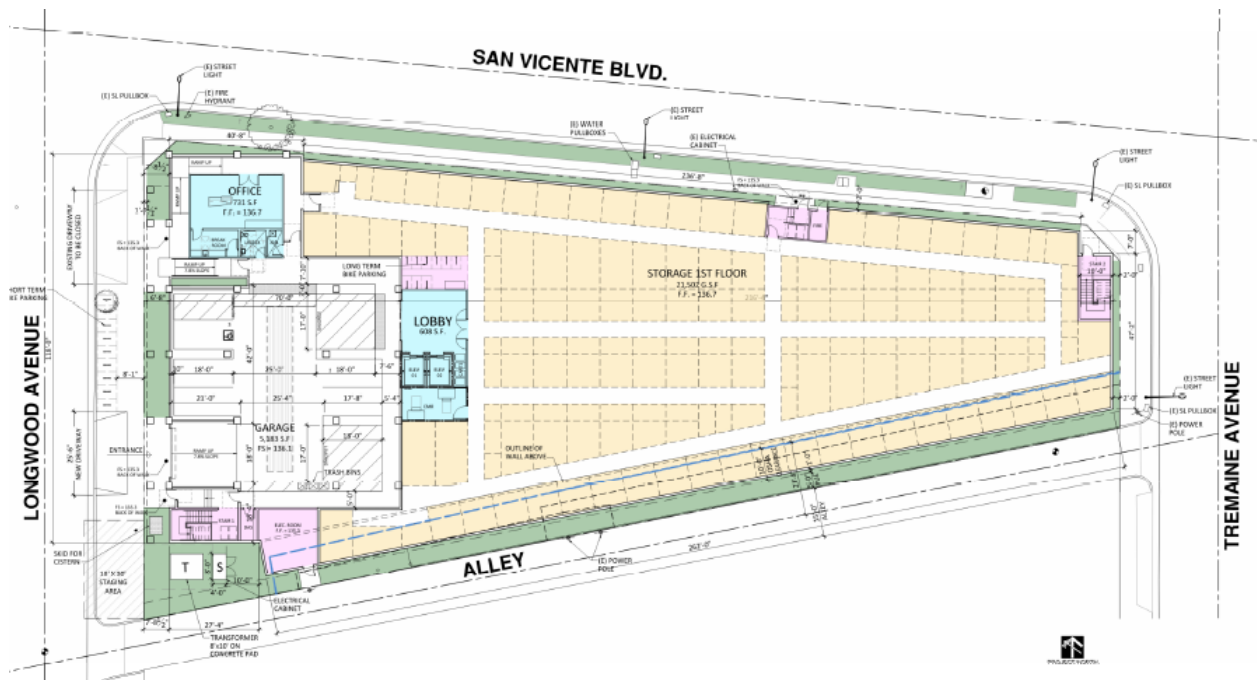
¹¹ Los Angeles City Planning Form CP-4068 Tree Report, Alison Lancaster, Updated November 3, 2025. Included in **Appendix B**.

¹² LAMC Section 46.01: "PROTECTED TREE OR SHRUB" means any of the following Southern California indigenous tree species, which measures four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree, or any of the following Southern California indigenous shrub species, which measures four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the shrub: **Protected Trees:** (a) Oak tree including Valley Oak (*Quercus lobata*) and California Live Oak (*Quercus agrifolia*), or any other tree of the oak genus indigenous to California but excluding the Scrub Oak (*Quercus berberidifolia*); (b) Southern California Black Walnut (*Juglans californica*); (c) Western Sycamore (*Platanus racemosa*); (d) California Bay (*Umeellularia californica*). **Protected Shrubs:** (a) Mexican Elderberry (*Sambucus mexicana*); (b) Toyon (*Heteromeles arbutifolia*). This definition shall not include any tree or shrub grown or held for sale by a licensed nursery, or trees or shrubs planted or grown as a part of a planting program.

The building includes self-storage rooms on all seven floors, as well as a 954-square-foot office area on the ground floor. The storage units would range in size from between 25 to 200 square feet across each floor. The proposed hours of operation of the self-storage facility would be between 6:00 AM to 11:00 PM, daily.

See **Figure 3-3, Site Plan**, for the plan of the Project.

**Figure 3-3
Site Plan**



3.4.2 Design and Architecture

See **Appendix A** of this document for floor plans, elevations, sections, and renderings. The Project has been designed as an integrated single structure with articulation and variation consistent with applicable City design guidance. The Project's five (5) parking spaces would be located in an enclosed ground floor parking area. Storage units within the building have been integrated into the overall architectural theme of the Project.

The ground floor of the building will include a leasing office located at the northwest side of the building, as well as a lobby within the secured area of the facility. Storage units would range in size and are distributed throughout all levels of the building.

The proposed development is designed as a contemporary multi-story storage facility with a streamlined, functional layout. The architecture emphasizes efficiency and accessibility, with a ground floor that incorporates a lobby, office space, loading areas, and parking garage, while upper levels are dedicated to storage units arranged in consistent modular grids. Two centrally located elevators and dual stairwells provide circulation and meet safety requirements, while

ramps accommodate smooth vehicular and pedestrian access. The building massing is straightforward and rectilinear, with parapet walls and a roof-level elevator penthouse adding to the vertical expression. Landscape elements, including drought-tolerant plantings such as agave, rosemary, and star jasmine, soften the edges of the property and enhance the streetscape along San Vicente Boulevard. Overall, the building blends functionality with modern architectural flair, creating an upscale look for what is typically a utilitarian use.

Mechanical systems, trash enclosures, utilities, and surface or roof mounted mechanical equipment are screened from public view.

3.4.3 Floor Area

See **Table 3-3** for the floor area and floor area ratio (FAR). Per the definition of Buildable Area in Los Angeles Municipal Code (LAMC) Section 12.03, “All that portion of a lot located within the proper zone for the proposed main building, excluding those portions of the lot which must be reserved for yard spaces, building line setback space, or which may only be used for accessory buildings or uses.”

Table 3-3
Project Floor Area

Buildable Area	LAMC Base		Maximum		Proposed	
	FAR	Floor Area	FAR	Floor Area	FAR	Floor Area
30,613 sf	1.5:1	45,919 sf	6:1	183,678 sf	5.72:1	161,645 sf
sf = square feet LAMC = Los Angeles Municipal Code Plans, KSP Studio Architecture, October 10, 2025. Included in Appendix A of this document.						

Under LAMC Section 12.14.C.3, properties located in the C Zone with a Height District of 1 are limited to a FAR of 1.5:1. With a buildable area of 30,612 square feet, the buildable floor area at the Project Site is limited to 45,919 square feet.

The Project requests a Zone Change/Height District Change from the existing C2-1-O Zone to the proposed C2-2-O Zone to increase the allowable FAR from 1.5:1 to 6:1. The Zone and Height District Change would specifically update the Height District from 1 to 2 to permit the additional floor area.

The Project proposes a total of 161,645 square feet (5.28:1 FAR).

3.4.5 Setbacks

Under LAMC Section 12.14.C.1 and 2, front yards are not required, and side and rear yards are not required for buildings erected and used exclusively for commercial purposes.

LAMC Section 12.03 defines Commercial Corner Development as, “(1) Any commercially used corner lot located in a C or M zone in Height District Nos. 1, 1-L, 1-VL or 1-XL, the lot line of which adjoins, is separated only by an alley adjacent to, or is located across the street from, any portion of a lot zoned A or R, or improved with any residential use (except in an M zone).”

Because the Project Site is located within a C Zone and Height District 1 and is located across the street from an R3 zone, Commercial Corner regulations apply.

3.4.6 Height

Pursuant to LAMC Section 12.21.1.B.3(a), rooftop structures, equipment and improvements may exceed the maximum building height when authorized, provided the structure, equipment or improvement is screened from public view using non-reflective materials or otherwise made compatible with the overall design of the building.

Pursuant to LAMC Section 12.21.1.B.3, chimney, exhaust ducts, solar water heaters, or any roof structure housing stairways, elevators or ventilation fans may also exceed the building height limit by up to five feet but are not required to provide a setback from the perimeter of the roof. Where height is limited to 75 feet, roof structures for the housing of elevators and stairways may exceed the building height limit by up to 20 feet in height.

The maximum height in the C Zone within Height District No. 1 is unlimited to height and stories.

The proposed seven-story (84 feet and 8 inches to top of parapet) building will be consistent with the unlimited height and stories.

3.4.7 Trash, Loading, and Mechanical Equipment

The Project is designed to minimize the visual impact of trash receptacles and utility areas. Trash bin space is located within the ground floor parking area. Landscaping and the building walls would hide the parking and trash area and is not visible from surrounding public streets and public view.

One loading space is required and must have a minimum height of 14 feet and shall be directly accessible through a usable door not less than 3 feet in width and 6 feet, 6 inches in height opening from the building it is to serve. The space must have a minimum area of 600 square feet, minimum width of 20 feet measured along the alley line, and minimum depth of 10 feet measure perpendicularly to the alley line. There will be two loading spaces (612 square feet) immediately adjacent to the lobby.

Utility rooms will be located within the building and not visible from surrounding public streets and public view. Rooftop mechanical equipment will be set back from the roof parapet edge and appropriately screened from public view.

3.4.8 Access and Circulation

There is one (1) curb cut along Tremaine Avenue and two (2) curb cuts along Longwood Avenue fronting the Project Site. All curb cuts would be closed. One (1) new curb cut and driveway would be provided on Longwood Avenue providing access to the ground level parking area and loading area.

3.4.9 Vehicle Parking

Table 3-4, Vehicle Parking, provides the amount of required and provided vehicle parking for this Project. Pursuant to LAMC Section 12.21.A.4(c)(1), the required number is parking spaces for a warehouse building (including a self-storage building), is one parking space for each 500 square feet of floor area for the first 10,000 square feet, and one parking space for each additional 5,000 square feet of floor area.

AB 2097 generally prohibits a public agency from imposing minimum automobile parking requirements on most types of development within half a mile of a Major Transit Stop (see Section 3.2.6 for further details). Pursuant to AB 2097, the Project would request relief from the automobile parking requirements otherwise imposed by LAMC 12.21.A.4.

The Project will voluntarily provide five (5) parking spaces.

**Table 3-4
Vehicle Parking**

Use	Size	LAMC Required		AB 2097	Provided
		Rate	Amount	Amount	
Warehouse	First 10,000 sf	1 space / 500 sf	20	0	
	Next 165,047 sf	1 space / 5,000 sf	33		
Total			53	0	5
Per LAMC Section 12.21.A.4(c)(1). Plans, KSP Studio Architecture, October 10, 2025. Included as Appendix A of this document.					

3.4.10 Bicycle Parking

Table 3-5, Bicycle Parking, provides the amount of required and provided bicycle parking. LAMC 12.21.A.16(a) requires new projects to provide bicycle parking spaces. Short-term bicycle parking shall consist of bicycle racks that support the bicycle frame at two points. Long-term bicycle parking shall be secured from the general public and enclosed on all sides and protect bicycles from inclement weather. The Project will provide 36 bicycle parking spaces (18 short-term and 18 long-term).

3.4.11 Lighting and Signage

Exterior lighting will be shielded to reduce glare and eliminate light being cast into the night sky. Security lighting will be integrated into the overall architecture and landscaping. The Project will also comply with LAMC lighting regulations that include approval of street lighting plans by the Bureau of Street Lighting; limited light intensity from signage to no more than three foot-candles above ambient lighting; and limited exterior lighting to no more than two-foot-candles of lighting intensity or direct glare onto specified sensitive uses, under the terms of the LAMC Section 93.0117(b).

Project signage will include building identification, wayfinding, and security markings. Signage will be similar to other signage in the Project's vicinity.

**Table 3-5
Bicycle Parking**

Use	Size	Short-Term Spaces			Long-Term Spaces		
		Rate	Required	Provided	Rate	Required	Provided
Office	731 sf	2 minimum	2	2	2 minimum	2	2
Storage	160,914 sf	1 / 10,000 sf	16	16	1 / 10,000 sf	16	16
Total			18	18		18	18

LAMC Table 12.21 A.16 (a)(1)(i) and Ordinance No. 185,480.
A minimum of two short-term bicycle parking spaces shall be provided in all cases.
Per LAMC Section 12.21.A.16(b): When the application of these regulations results in the requirement of a fractional bicycle space, any fraction up to and included on half may be disregarded, and any fraction over one-half shall be construed as requiring one bicycle parking space.
Therefore the 2.5 spaces rounds down to 2 spaces.
Plans, KSP Studio Architecture, October 10, 2025. Included as **Appendix A** of this document.

3.4.12 Street Tree Removal and Replacement

As mentioned previously, there are two (2) street trees (southern magnolia) along Longwood Avenue and three (3) street trees (one purple orchid tree and two Japanese privet) along San Vicente Boulevard. The Project includes removal of the two (2) southern magnolia street trees and replacement of these street trees at a 2:1 ratio in accordance with City standards and to the satisfaction of the Department of Public Works Urban Forestry Division. The remaining street trees would be protected in place.

3.4.13 Site Security

The building will include premium security features that include internally accessed storage units, a unique passcode required for building entry and elevator usage, logged entry and exit times, and maximum parking lot lighting. Access into the building is through the ground floor lobby with two elevators and stairwells at the southwestern and northeastern corners of the Property. There will be digital security cameras recording all activity in the parking lot, loading zones, elevator lobbies and internal corridors, 24/7 with no blind spots. All locks on storage units will be provided by USSC to ensure maximum security. Customer access hours will be limited between 6:00 AM and 11:00 PM, and customer pin codes will not allow access outside of those hours.

The Project would provide a security program to ensure the safety of its employees and visitors. Security features to assist in crime prevention efforts and to reduce the demand for police protection services would include secured building access/design to interior areas; lighting of building entryways and areas; and possible video surveillance. The security program would include controlling access; monitoring entrances and exits of buildings; monitoring fire/life/safety systems, and security lighting.

3.5 Sustainability Features

The Project would comply with the applicable Los Angeles Green Building Code (LAGBC, 2023 version effective January 1, 2023) and the applicable California Green Building Standards Code

(CalGreen, 2022 version effective January 1, 2023). The applicability is determined when the Project is submitted and accepted by plan check.

All building systems would meet applicable Title 24 Energy Standards. These standards would reduce energy and water usage and waste and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure.

The sustainability features to be incorporated into the Project would include, but not be limited to, WaterSense-labeled plumbing fixtures and Energy Star-labeled appliances, reduction of indoor and outdoor water use, weather-based controller and drip irrigation systems, and water-efficient landscape design. In addition, the landscaping on the outdoor decks would serve to help reduce solar heat gain and facilitate possible stormwater retention on-site.

The Project would recycle and reuse building and construction materials to the maximum extent feasible. The Project would provide EV spaces as required by the LAMC.

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

3.6 Estimated Construction Schedule

The estimated construction schedule is shown in **Table 3-6, Construction Schedule**. This information has been provided by the Applicant and reflects Site- and Project-specific assessments of anticipated construction phase lengths and equipment to be utilized.

The estimated operational year is 2028. Construction is proposed to finish in 2028, and the Project will undergo a standard process to obtain its certification of occupancy and will begin leasing. The operational year relates to future traffic operations and assumes a fully leased building for maximum trip and VMT purposes. The Project will remove approximately 2,080 tons of debris by demolishing the existing building and surface parking lots. The Project will cut 350 cubic yards (cy) of soil, fill 1,300 cy, and import 95 cy. There would be no export.

Truck routes are expected to utilize the most convenient access to freeway ramps. The truck routes will comply with the approved truck routes designated within the City and/or adjacent jurisdictions. Trucks traveling to and from the Project Site must travel along the designated routes. These streets are part of different approved haul routes.¹³ The truck route will be approximately 8 miles one-way to Express Disposal, 2221 East Washington Boulevard, Los Angeles, CA 90021.

¹³ NavigateLA, Haul Route layer: <https://navigate.la.city.org/navigate/>, accessed March 6, 2026.

**Table 3-6
Construction Schedule**

Phase	Schedule	Duration
Demolition	January 15, 2027 – February 15, 2027	1 month
Site Preparation	February 15, 2027 – February 30, 2027	2 weeks
Grading	March 01, 2027 – March 21, 2027	3 weeks
Trenching	March 15, 2027 – April 30, 2027	3 weeks
Paving	March 01, 2027 – March 05, 2027	1 week
Construction	March 01, 2027 – May 01, 2028	14 months
Architectural Coatings	March 01, 2028 – May 30, 2028	3 months

Demolition involves removing buildings or structures.

Site Preparation involves clearing vegetation (grubbing and tree/stump removal) and removing stones and other unwanted material or debris prior to grading.

Grading involves the cut and fill of land to ensure that the proper base and slope is created for the foundation.

Building Construction involves the construction of the foundation, structures, and buildings.

Trenching is associated with underground utilities, including gas, water, electricity, telecommunications.

Paving involves the laying of concrete or asphalt such as in parking lots, roads, driveways, or sidewalks.

Architectural Coating involves the application of coatings to both the interior and exterior of buildings or structures, the painting of parking lot or parking garage striping, associated signage and curbs, and the painting of the walls or other components such as stair railings inside parking structures.

Construction schedule, including start, end, and duration dates are estimates only.

Some overlap of phasing may occur.

The analysis assumes that construction will start in 2026. In practice, construction could begin at a later time. However, using an earlier start date represents a worst-case scenario for the analysis of construction emissions, because equipment and vehicle emission factors for later years will be slightly less due to more stringent standards for in-use off-road equipment and heavy-duty trucks, as well as fleet turnover replacing older equipment and vehicles in later years.

Estimates provided by the Applicant, September 2025.

3.7 Discretionary Requests

Discretionary entitlements, reviews, permits and approvals required to implement the Project will include, but are not necessarily limited to, the following:

- **Zone Change/Height District Change (ZC/HD)**, per LAMC Chapter 1A Section 13B.1.4, from the C2-1-O Zone to the C2-2-O Zone in order to permit additional floor area up to a maximum Floor Area Ratio of 6:1 in lieu of 1.5:1; including
 - **A waiver of the requirement** to dedicate and/or improve an additional 2.5 feet of the existing public alley;
 - **A waiver of the requirement** to improve an additional 3 feet of street widening along South Longwood Avenue;
- **Class 2 Conditional Use Permit (CU2)**, per LAMC Chapter 1A Section 13.B.2.2, to permit

storage uses within 500 feet of an R Zone; and

- **Project Review (PR)**, pursuant to LAMC Chapter 1A Section 13B.2.4, for a proposed development project that results in an increase of 50,000 gross square feet of non-residential floor area

As required by various sections of the LAMC, the Applicant will request the necessary administrative approvals and permits from the Building and Safety Department and other municipal agencies for Project construction actions, including but not limited to the following: demolition, excavation, shoring, grading, foundation, building, haul route, street tree removal and tenant improvements.

Section 4

Evaluation of Environmental Impacts

4.1 Aesthetics

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Except as provided in Public Resources Code Section 21099, would the project:

- a. Have a substantial adverse effect on a scenic vista?
- b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?
- c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?
- d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Impact Analysis

a) Would the project have a substantial adverse effect on a scenic vista?

No Impact. A significant impact would occur if a project introduced incompatible scenic elements within a field of view containing a scenic vista or substantially block views of an existing scenic vista. A scenic vista is a panoramic view of a valued visual resource. Panoramic views or vistas provide visual access to a large geographic area, for which the field of view can be wide and extend into the distance. Panoramic views are typically associated with vantage points looking out over a section of urban or natural areas that provide a geographic orientation not commonly available. Examples of panoramic views include an urban skyline, valley, mountain range, the ocean, or other water bodies. Focal views are also relevant when considering this question from Appendix G of the CEQA Guidelines. Examples of focal views include natural landforms, public art/signs, individual buildings, and specific, important trees.

Minimal scenic or natural setting views are visible due to the surrounding urban uses. In addition, CEQA is only concerned with public views with broad access by persons in general, not private

views that will affect particular persons.¹ Urban features that may contribute to a valued aesthetic character or image include: structures of architectural or historic significance or visual prominence; public plazas, art or gardens; heritage oaks or other protected trees or plants; consistent design elements (such as setbacks, massing, height, and signage) along a street or district; pedestrian amenities; landscaped medians or park areas; etc. There are no tall features on the Project Site from which scenic vistas may be obtained or which make up part of the scenic landscape of the surrounding community.

The Project Site is located along San Vicente Boulevard within an urbanized portion of the City of Los Angeles (City). The surrounding area is developed with a mix of one- to two-story commercial, industrial, residential, and public utility uses, including multi-family housing, studios, a grocery store, and LADWP infrastructure. The area does not contain any designated or prominent scenic vistas, and the site itself is not located within a designated scenic corridor, view protection area, or Specific Plan that includes view preservation standards.

The Project involves the construction of a seven-story self-storage building with a maximum height of approximately 84 feet and 8 inches. The proposed structure has been designed with a sleek, modern architectural style incorporating articulation, varying materials, and transparent glazing. The building would replace an existing single-story warehouse and parking lot and would be consistent with the urban scale and character of the surrounding built environment. Furthermore, views of notable features in the broader region—such as the Santa Monica Mountains or Downtown Los Angeles skyline—are already blocked or filtered by existing development and vegetation and would not be newly obstructed or altered by the project. The design integrates landscaping, setbacks, and screened rooftop equipment to minimize visual massing and avoid creating a prominent visual intrusion. No designated scenic vistas or recognized public view corridors would be adversely affected. Thus, the Project would not have a substantial adverse effect on a scenic vista. Therefore, no impacts related to scenic vistas would occur as a result of the Project.

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

No Impact. The California Department of Transportation (Caltrans) maintains an official list of State Scenic Highways. The Project Site is not located along a state scenic highway. The closest officially designated state scenic highways are²:

- State Route 27, Topanga Canyon Boulevard, from Mulholland Highway to Pacific Coast Highway. This is 14.0 miles west of the site.

¹ Obstruction of a few private views in a project's immediate vicinity is not generally regarded as a significant environmental impact. (See *Ocean View Estates Homeowners Assn., Inc. v. Montecito Water Dist.*, supra, 116 Cal.App.4th at p. 402 [that a project affects "only a few private views" suggests that its impact is insignificant]; *Mira Mar Mobile Community v. City of Oceanside*, supra, 119 Cal.App.4th at pp. 492-493 [distinguishing public and private views; "[u]nder CEQA, the question is whether a project will affect the environment of persons in general, not whether a project will affect particular persons"].

² Caltrans State Scenic Highways Map: <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>, accessed August 4, 2025.

- State Route 2, Angeles Crest Highway, from 3 miles north of I-210 in La Canada to the San Bernardino County Line. This is 14.75 miles northeast of the site.

Additionally, the Project Site does not contain any scenic resources. Thus, the Project would not substantially damage scenic resources within a state scenic highway as no state scenic highways are located adjacent to or near the Project Site. Therefore, no impacts related to this issue would occur as a result of the Project.

- c) In non-urbanized areas, would the project 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?**

No Impact. The Project Site is located within an urbanized area. As such, this analysis focuses on whether the Project would conflict with applicable zoning and other regulations governing scenic quality.

Zoning

The Project Site is currently zoned C2-1-O (Commercial Zone, Height District 1, Oil Drilling Overlay). The “1” suffix corresponds to the Height District 1, which in the C Zone permits unlimited height and stories and a maximum Floor Area Ratio (FAR) of 1.5:1. The Project proposes the construction of a new seven-story self-storage warehouse building encompassing a floor area of 161,645 square feet (5.28:1 FAR). The Project requests both a Zone Change and Height District Change, pursuant to LAMC Chapter 1A Section 13B.1.4, to accommodate the proposed Floor Area Ratio and a Class 2 Conditional Use Permit (CUP), per LAMC Chapter 1A Section 13.B.2.2, for storage uses within 500 feet of an R Zone. In addition, pursuant to LAMC Chapter 1A Section 13B.2.4, the Project requests a Project Review for a proposed development project resulting in an increase of 50,000 square feet of non-residential floor area.

The Project Site is located along West San Vicente Boulevard within an urbanized portion of the City. The surrounding area is developed with a mix of one- to two-story commercial, industrial, residential, and public utility uses, including multi-family housing, studios, a grocery store, and LADWP infrastructure. As such, the proposed uses would not degrade the existing visual character or quality of the area.

The proposed building would be an extension of the existing types of buildings already in the area (large warehouse-style buildings such as the existing on-site building, “Living Spaces” building to the south, and “Lowe’s Home Improvement” building to the east) and would not introduce a new visual feature that would be out of character for the area and overall Community Plan area. Therefore, the proposed building and height would not conflict with the existing visual character of the area surrounding the Project Site.

Local land use regulations applicable to the Project Site that include policies that address scenic quality include the Los Angeles Municipal Code (LAMC), the City of Los Angeles General Plan Framework Element (Framework Element), the Community Plan, and the Citywide Design Guidelines. These plans, policies, and regulations are discussed in more detail below.

The Project would be consistent with a number of the design elements, including minimizing contrasts in scale and massing with the surrounding area, designing the Project consistent with applicable design guidelines and maintaining the Project Site such that blight or nuisance conditions do not occur.

General Plan Framework Element

The Framework Element provides direction regarding the City’s vision for future development in the City. Although the Framework Element does not directly address the design of individual neighborhoods or communities, it embodies general neighborhood design policies and implementation programs that guide local planning efforts. Specifically with regard to aesthetics, the Framework Element includes goals, policies, and objectives regarding the scale and character of neighborhoods, the quality of development and public realm (Chapter 5), and topics related to lighting (Chapter 9). The Project’s consistency with each of the relevant goals, policies, and objectives is outlined in **Table 4.1-1**.

**Table 4.1-1
Project Consistency with City of Los Angeles General Plan Framework Element**

Goal/Objective/Policy	Analysis of Project Consistency
General Plan Framework Element Land Use Chapter (Chapter 3)	
Goal 3.J: Industrial growth that provides job opportunities for the City's residents and maintains the City's fiscal viability.	No Conflict. The Project includes development of a self-storage facility that will provide employment opportunities and generate sales and property tax.
General Plan Framework Element Urban Form and Neighborhood Design Chapter (Chapter 5)	
Objective 5.5: Enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm.	No Conflict. The Project would construct a new modern public self-storage facility that will activate the site. The Project’s street frontages would have additional landscaping buffers with additional trees, thereby creating a pedestrian-friendly environment and improving the quality of the public realm. Overall, the Project would be designed to complement and enhance the surrounding area.
General Plan Framework Element Infrastructure and Public Services Chapter (Chapter 9)	
Goal 9P: Appropriate lighting required to: (1) provide for nighttime vision, visibility, and safety needs on streets, sidewalks, parking lots, transportation, recreation, security, ornamental, and other outdoor locations; (2) provide appropriate and desirable regulation of architectural and informational lighting such as building façade lighting or advertising lighting; and (3) protect and preserve the nighttime environment, views, driver visibility, and otherwise minimize or prevent light pollution, light trespass, and glare.	No Conflict. The Project would include low-level exterior lights for security. All lighting would comply with current energy standards and regulations, as well as design requirements. Project lighting would be designed to provide efficient and effective on-site lighting while minimizing light spill-over from the Project Site, reducing sky-glow, and improving nighttime visibility through glare reduction. All exterior and interior lighting would meet high energy efficiency requirements utilizing light emitting diode (LED) or efficient fluorescent lighting technology. New street and pedestrian lighting within the public right-of-way would comply with applicable City regulations.
Objective 9.40: Ensure efficient and effective energy management in providing appropriate	No Conflict. Proposed lighting would be implemented in accordance with the lighting standards set forth in the

**Table 4.1-1
Project Consistency with City of Los Angeles General Plan Framework Element**

Goal/Objective/Policy	Analysis of Project Consistency
levels of lighting for private outdoor lighting for private streets, parking areas, pedestrian areas, security lighting, and other forms of outdoor lighting and minimize or eliminate the adverse impact of lighting due to light pollution, light trespass, and glare.	California Building Code and the California Energy Code, which establish light intensities for various land uses. Furthermore, as discussed above under Goal 9P, the Project would minimize light pollution, light trespass, and glare.
Policy 9.40.1: Require lighting on private streets, pedestrian oriented areas, and pedestrian walks to meet minimum City standards for street and sidewalk lighting.	No Conflict. Refer to the discussion for Goal 9P above.
Policy 9.40.2: Require parking lot lighting and related pedestrian lighting to meet recognized national standards.	No Conflict. Refer to the discussion for Goal 9P above. The Project would provide sufficient lighting throughout the Project Site to ensure safety and visibility.
Policy 9.40.3: Develop regulations to ensure quality lighting to minimize or eliminate the adverse impact of lighting due to light pollution, light trespass, and glare for façade lighting, security lighting, and advertising lighting, including billboards.	No Conflict. While this policy is a citywide goal relating to lighting regulations, the Project would not conflict with its implementation. Refer to the discussion for Goal 9P above.
General Plan Conservation Element (Section 15)	
Objective: Protect and reinforce natural and scenic vistas as irreplaceable resources and for the aesthetic enjoyment of present and future generations.	No Conflict. The Project is located in an urban area and built out surroundings. Therefore, publicly available views of any valued visual resources in the vicinity of the Project Site would be maintained. Thus, the Project would not obstruct or remove access to natural and scenic vistas.
Project consistency with additional Framework Element goals, objectives, and policies is analyzed under Section 5.11, Land Use and Planning.	

The Project would enhance the built environment in the surrounding area and upgrade the quality of development by constructing a self-storage building that would incorporate design elements that would enhance the quality of the visual environment.

The built environment is characterized by a variety of architectural styles, age of buildings, type of developments, and size. The Project design alternates different textures, colors, materials, and distinctive architectural treatments to add visual interest while avoiding dull and repetitive façades.

This building has a sleek, modern design characterized by clean lines and a striking facade. The most distinctive element is the dynamic wave-like pattern on the glass and metal upper facade. The undulating dark and light blue tones create a sense of movement and visual interest. The upper portion of the building features extensive glass panels, giving it a contemporary and transparent look. Vertical fins or louvers enhance the visual rhythm. The structure combines stone or concrete at the base with metal and glass on the upper floors, offering a solid, durable foundation with a lighter, more refined top. Trees and greenery line the sidewalk and parking area, softening the structure's modern feel. Overall, the building blends functionality with modern

architectural flair, creating an upscale look for what is typically a utilitarian use. Mechanical systems, trash enclosures, utilities, and surface or roof mounted mechanical equipment will be screened from public view. In addition, the Project would activate the ground-floor street-facing façades with enhanced landscaping, a transparent lobby frontage, and increased glazing. As such, the Project would be designed to complement and enhance the surrounding area.

During construction, construction walls and barriers would be erected to protect the site from vandalism and, which have the potential to attract unauthorized bills and postings. The Project will comply with LAMC Section 14.4.17, which regulates temporary signage on construction barriers.

During operation, the Project would be maintained in a safe and sanitary condition and good repair, and free from, debris, rubbish, garbage, trash, overgrown vegetation or other similar material, pursuant to LAMC Section 91.8104.

The Project would also support the Framework Element's goals, policies and objectives related to lighting. Project lighting would be designed to minimize light trespass from the Project Site and would comply with all applicable LAMC requirements. In addition, any new street and pedestrian lighting within the public right-of-way would comply with applicable City regulation and would require approval from the Bureau of Street Lighting in order to maintain appropriate and safe lighting levels on sidewalks and roadways while minimizing light and glare on adjacent streets.

Overall, the Project design would contribute to the overall quality of the visual environment and would not contrast with the varying design elements of the uses adjacent to the Project Site. The Project would be generally consistent with the applicable goals, policies, and objectives set forth in the Framework Element's regarding scenic quality as detailed above.

Community Plan

As it relates to scenic quality, the Wilshire Community Plan includes Objective 2-3:

Enhance the visual appearance and appeal of commercial districts.

The Project would construct a self-storage building in a commercial area. The Project incorporates a modern, well-articulated building design with high-quality materials and façade treatments that provide visual interest and break up massing, contributing positively to the streetscape. The project includes new landscaping along the street frontage and perimeter of the site, as well as pedestrian-oriented improvements such as decorative paving and appropriate lighting, which enhance the public realm and improve the pedestrian experience. Since the Project Site is currently underutilized with aging or deteriorating structures, the new development would represent a visual upgrade and reinvestment in the corridor, replacing obsolete or unsightly conditions with a clean, modern facility. The Project has been designed to be compatible with surrounding commercial development in terms of scale, massing, and setbacks, helping it integrate into the existing urban fabric while reinforcing a cohesive visual identity for the district. As a professionally managed facility, the self-storage project is expected to be well-maintained over time, contributing to long-term visual appeal and reducing the likelihood of deterioration or vacancy, which can negatively affect commercial corridors. Thus, the Project would be generally consistent with this Community Plan provision.

Citywide Design Guidelines

The Citywide Design Guidelines, adopted October 24, 2019, establishes ten guidelines to carry out the common design objectives that maintain neighborhood form and character while promoting quality design and creative infill development solutions. Although each of the Citywide Design Guidelines should be considered in a project, not all will be appropriate in every case. The Project would not conflict with the Citywide Design Guidelines, as discussed below.

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

The Project would not conflict with the pedestrian experience adjacent to the Project Site which contains sidewalks along San Vicente Boulevard, Longwood Avenue, and Tremaine Avenue. In addition, the Project would install new trees and landscaping along the sidewalks to help create a safe and comfortable passage for pedestrians. The installation of eight (8) trees will provide shade coverage on warm days. The Project also addresses clear identification, and transparency from the street-level with glazing on all building façades, integrated lighting, and clear signage. Access points would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access and would incorporate pedestrian warning systems, as appropriate.

The Project would also comply with Americans with Disabilities Act (ADA) requirements.

Furthermore, the Project would include low-level exterior lights adjacent to the building and along pathways that would serve to enhance the safety of visitors and employees at night. Overall, these Project elements would promote a safe, comfortable, and accessible pedestrian experience for all. Thus, the Project would support this guideline.

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

There is currently one (1) curb cut on Tremaine Avenue and two (2) curb cuts on Longwood Avenue adjacent to the Project Site. All existing curb cuts would be closed with the proposed Project. The Project proposed one (1) new curb cut and driveway on Longwood Avenue providing access to the ground-level parking loading areas. The driveway would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access and would incorporate pedestrian warning systems, as appropriate. Thus, the Project would support this guideline.

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

The building uses a variety of architectural materials and building planes. In addition, the Project would install landscaping, including new trees. Overall, the Project would be designed to actively engage with streets and public space and maintain human scale. Thus, the Project would support this guideline.

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

The area surrounding the Project Site is predominantly developed with low-rise residential uses. The Project design alternates different textures, colors, materials, and distinctive architectural treatments to add visual interest while avoiding dull and repetitive façades. Overall, relative to the surrounding development, the Project design would complement the varying design elements of the uses adjacent to the Project Site. Thus, the Project would support this guideline.

Guideline 5: Express a clear and coherent architectural idea.

The building use a variety of architectural materials and building planes. The Project design alternates different textures, colors, materials, and distinctive architectural treatments to add visual interest while avoiding dull and repetitive façades. The proposed design employs a variety of elements to break down the building façade. Overall, the Project design would express an active, pedestrian-friendly, compatible design that would complement the varying design elements of the uses adjacent to the Project Site. Thus, the Project would support this guideline.

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

The Project would provide a total of eight (8) street trees and enhanced landscaping along the adjacent sidewalks (Three (3) of the existing five (5) street trees will remain, and the two (2) trees proposed for removal will be replaced at a 2:1 ratio to the satisfaction of the Urban Forestry Division). The street trees would provide shade coverage over the right-of-way thereby creating a comfortable passage for pedestrians. In addition, the Project would include low-level exterior lights adjacent to the building and along walkways that would serve to enhance the safety of pedestrians at night. Thus, the Project would support this guideline.

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

Parking would be provided in an existing surface lot that will be restriped. The Project would also include lighting of building entry and walkway to provide for pedestrian orientation and to clearly identify a secure route between the parking lot and the building. Thus, the Project would support this guideline.

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

The Project Site is located in an urbanized area. There are no on-site trees. There are two (2) street trees (southern magnolia) along Longwood Avenue and three (3) street trees (one (1) purple orchid tree and two (2) Japanese privet) along San Vicente Boulevard.³ None are protected trees or shrubs as defined by the City.⁴ The Project would remove the two (2) southern

³ City of Los Angeles, StreetsLA: <https://streetsla.lacity.org/tree-inventory>, accessed July 3, 2025.

⁴ LAMC Section 46.01: "PROTECTED TREE OR SHRUB" means any of the following Southern California indigenous tree species, which measures four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree, or any of the following Southern California indigenous shrub species, which measures four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the shrub: Protected Trees: (a) Oak tree including Valley Oak (*Quercus lobata*) and California Live Oak (*Quercus agrifolia*), or any other tree of the oak genus indigenous to California but excluding the Scrub Oak (*Quercus berberidifolia*); (b) Southern California Black Walnut (*Juglans californica*); (c) Western Sycamore (*Platanus racemosa*); (d) California Bay (*Umeellularia californica*). Protected Shrubs: (a) Mexican Elderberry (*Sambucus mexicana*); (b) Toyon (*Heteromeles arbutifolia*). This definition shall not include any tree or shrub grown or held for sale by a licensed nursery, or trees or shrubs planted or grown as a part of a planting program.

magnolia street trees along Longwood Avenue and replace these street trees at a 2:1 ratio in accordance with City standards. The remaining street trees would be protected in place. Thus, the Project would support this guideline.

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

The Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and the CALGreen. The Project's design is based on principles of smart growth and environmental sustainability, as demonstrated by its mixed-use configuration, emphasis on walkability, bike-friendly environment, and proximity to public transit. "Green" features would include energy-efficient buildings, a pedestrian-friendly site design, and water conservation and waste reduction measures, among others. The Project would also utilize sustainable planning and building strategies and would incorporate the use of environmentally friendly materials wherever applicable. Therefore, the Project would lower energy demand and increase the comfort and well-being of users through site layout, building massing, and orientation. Thus, the Project would support this guideline.

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

The Project would be required to comply with the City's Low Impact Development (LID) ordinance and implement standard erosion controls to limit stormwater runoff. As part of these requirements, the Project would include the installation of building roof drain downspouts, catch basins, and planter drains throughout the Project Site. The installed BMP systems will be designed with an internal bypass overflow system to prevent upstream flooding during major storm events. The stormwater, which bypasses the BMP systems, would discharge to an approved discharge point in the public right-of-way.

The Project generally drains south towards existing public catch basins on Longwood Avenue, San Vicente Boulevard, and Tremaine Avenue, which all drain to drainage facilities in Pico Boulevard. The Project will maintain existing drainage patterns to Pico Boulevard drainage facilities. Per the geotechnical report, infiltration is infeasible. A capture and use system of approximately 2,510 cubic feet is proposed for the site, per LID requirements.⁵

In addition, the Project would incorporate drought tolerant landscaping throughout the Project Site. Thus, the Project would support this guideline.

Based on the above, the Project would not conflict with applicable regulations governing scenic quality, including those contained in the LAMC, General Plan Framework Element, Community Plan, and Citywide Design Guidelines. Therefore, no impacts related to this issue would occur as a result of the Project.

⁵ Peak Flow Hydrologic Analysis, DRC Engineering, August 2025.

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

No Impact. Nighttime illumination of varying intensities is characteristic of most urban land uses, including those in the vicinity of the Project Site. New light sources introduced by a project may increase ambient nighttime illumination levels. Additionally, nighttime spillover of light onto adjacent properties has the potential to interfere with certain functions, including vision, sleep, privacy, and general enjoyment of the natural nighttime condition. The significance of the impact depends on the type of use(s) affected, proximity to the affected use(s), the intensity of the light source, and the existing ambient light environment. Uses considered sensitive to nighttime light include, but are not limited to, residential, some commercial and institutional uses, and natural areas.

Glare occurs during both daytime and nighttime hours. Daytime glare is caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass or reflective materials, and, to a lesser degree, from broad expanses of light-colored surfaces. Daytime glare generation is common in urban areas and is typically associated with mid- to high-rise buildings with exterior façades largely or entirely comprised of highly reflective glass or mirror-like materials from which the sun can reflect, particularly following sunrise and prior to sunset. Daytime glare generation is typically related to sun angles, although glare resulting from reflected sunlight can occur regularly at certain times of the year. Glare can also be produced during evening and nighttime hours by artificial light directed toward a light-sensitive land use.

Construction

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

Daytime glare could potentially occur during construction activities if reflective construction materials were positioned in highly visible locations where the reflection of sunlight could occur. Minor amounts of glare could also occur due to on-site vehicles. However, any glare would be highly transitory and short-term, given the movement of construction equipment and materials within the construction area and the temporary nature of construction activities. In addition, large,

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

flat surfaces that are generally required to generate substantial glare are typically not an element of construction activities. Furthermore, as noted above, construction would primarily occur during the daytime hours in accordance with the LAMC. Therefore, there would be a negligible potential for nighttime glare associated with construction activities to occur, and impacts would be less than significant.

Operation

The Project would construct a seven-story building and interior lighting through windows would increase as compared to the existing setting. Also, the commercial nature of the Project would create additional lighting into the night hours. The Project will provide illumination at street level for security. All security lighting will be shielded and focused on the site and directed away from the neighboring land uses to the maximum extent feasible and consistent with safety requirements. In addition to increasing the ambient “glow” presently associated with urban settings and with this part of the City, project-related light sources could potentially spill over and illuminate off-site vantages including adjacent streets and land uses.

Vehicle headlights from traffic also contribute to overall ambient lighting levels. The Project would include low-level exterior lights along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage would be incorporated. All lighting would comply with current energy standards and regulations, as well as design requirements. Project lighting would be designed to provide efficient and effective on-site lighting while minimizing light spill-over from the Project Site, reducing sky-glow, and improving nighttime visibility through glare reduction. Specifically, all on-site exterior lighting would be automatically controlled via photo sensors to illuminate only when required and would be shielded or directed toward areas to be illuminated to limit spill-over onto neighboring properties. All exterior and interior lighting would meet high energy efficiency requirements utilizing light emitting diode (LED) or efficient fluorescent lighting technology. New parking lot lighting would comply with applicable City regulations.

Proposed signage would be designed to be aesthetically compatible with the proposed architecture of the building and its surroundings. Proposed signage would include identity signage, building and tenant signage, and general ground level and way-finding pedestrian signage that would comply with LAMC regulations, as applicable. No new billboards or other off-site advertising are proposed as part of the Project. The Project would also not include signage with flashing or mechanical properties. Proposed signage would be illuminated via low-level, low-glare external lighting, internal halo lighting, or ambient light. Exterior lighting for signage would be directed onto signs to avoid creating off site glare. Illumination used for Project signage would comply with light intensities set forth in the LAMC and as measured at the property line of the nearest residentially zoned property.

As it relates to glare, sun reflection from Project development could occur when the sun is low on the horizon, and motor vehicle operations could be affected when the point of reflection within the Project Site is in front of the driver. The Project would feature a variety of surface materials, including, but not limited to, glass, concrete, timber, and metal. As part of the Project, glass used in building façades would have high-performance coatings that would not be highly reflective, thereby minimizing glare from reflected sunlight.

Nighttime glare could result primarily from on-site illumination and vehicle headlights. As described above, the Project's illuminated signs would not exceed the prescribed LAMC lighting requirements. Furthermore, while headlights from vehicles entering and exiting the Project Site would be visible during the evening and nighttime hours, such lighting sources would be typical for the area. Thus, nighttime glare would not result in a substantial adverse impact.

The Project would adhere to existing regulatory requirements regarding light and glare, including those contained in the LAMC, the City's Green Building Code, and CALGreen (e.g., LAMC Section 93.0117(b), LAMC Section 99.05.106.8, CALGreen Section 5.106.8).

The Project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Compliance with regulatory requirements would further ensure that impacts associated with light and glare would be less than significant. Notwithstanding, the Project would be consistent with a number of the design elements, including use of shielded light fixtures with low reflectivity, limiting construction activities to the permitted construction hours, incorporating lighting to minimize off-site light pollution, and use of low-reflective glass.

Thus, based on the above, construction and operation of the Project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Therefore, no impacts would occur.

Cumulative Impacts

A cumulative analysis of aesthetics impacts includes the related projects that would be sufficiently close to influence the visual character of the immediate Project area, that fall within the same viewshed as the Project, or that affect the same off-site sensitive uses.

There are three (3) related projects identified by the City within 0.5 miles of the Project (see **Table 4.21-1**). These related projects are dispersed within a highly urbanized environment and are separated from the Project by existing development and public rights-of-way. While each project may incrementally alter the visual character of its immediate surroundings, the changes are consistent with the established urban form and zoning designations of the area. The proposed self-storage facility would incorporate high-quality design and landscaping improvement and would not introduce visual elements that are out of scale or character with the surrounding context. Because the related projects are largely residential and geographically dispersed, they do not contribute to a collective degradation of the visual environment when considered with the Project. Each related projects, and the Project, is subject to individual design review and regulatory oversight to ensure compatibility with local visual and urban design standards.

The related projects would not be visible from the Project Site area, due to distance and intervening structures. No scenic vistas are available from the Project Site area and as such, development of related projects in the vicinity of the Project Site would not result in any cumulative impacts related to scenic vistas. The degree to which each of the Related Project sites contain scenic resources that could be affected by the related projects would be considered by the City on a case-by-case basis. The Project Site does not contain any scenic resources that are shared by or common to any of the related project sites. Related projects within the Project Site area would be required to undergo review and approval by the Department of City Planning to ensure

compliance with applicable design guidelines, which would ensure continuity of these projects with the City’s visual character/quality standards.

All related projects would result in an overall incremental intensification of land uses in the vicinity of the Project Site. However, the Project and related projects, including those identified above, would be required to comply with applicable City regulations, design guidelines, and other land use and zoning controls regarding density, floor area, lighting, and design. Furthermore, as described above, the Project would result in no impacts regarding scenic vistas, visual character, and light and glare.

Therefore, cumulative aesthetics impacts would be less than significant.

4.2 Agriculture and Forest Resources

	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"/>

Impact Analysis

- a) **Would the project 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 and surrounding area are designated Urban and Built-Up Land and not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency Department of Conservation.⁷ Thus, the Project would not convert Farmland to a non-agricultural use. Therefore, no impacts related to this issue would occur as a result of the Project.

⁷ State of California Department of Conservation, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2018, Map, websites: <https://maps.conservation.ca.gov/DLRP/CIFF/>, and <https://www.conservation.ca.gov/dlrp/fmmp/Pages/LosAngeles.aspx>, accessed August 4, 2025.

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The Project Site is located in an urbanized area of the City. The site is zoned C2-1-O (Commercial Zone, Height District 1, Oil Drilling Overlay) and Community Commercial land use designation. Additionally, the Project Site and surrounding area are also not enrolled under a Williamson Act Contract.⁸ Thus, the Project would not conflict with any existing zoning for agricultural uses or a Williamson Act Contract. Therefore, no impacts related to this issue would occur as a result of the Project.

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

No Impact. The Project Site does not include any forest land or timberland. In addition, the Project Site is currently zoned for commercial uses and is not zoned and/or used as forest land. Thus, the Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland as defined by Public Resources Code section 12220(g), Public Resources Code section 4526, and Government Code section 51104(g). Therefore, no impacts related to this issue would occur as a result of the Project.

d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. The Project Site is located in an urbanized area and does not contain any forest land. Thus, the Project would not result in the loss of forest land or conversion of forest land to non-forest use. Therefore, no impacts related to this issue would occur as a result of the Project.

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

No Impact. The Project Site is located within an urbanized area, and there is no farmland or forest land on or near the Project Site. Thus, the Project would not result in the conversion of farmland to non-agricultural use or forest land to non-forest use. Therefore, no impacts related to this issue would occur as a result of the Project.

Cumulative Impacts

The Project and the related projects are located within a developed, urbanized area of the City generally zoned for commercial and residential uses and do not support existing farming, agricultural, or forest-related operations. Thus, development of the related projects together with the Project would not result in the conversion of State-designated agricultural land from an agricultural use to a non-agricultural use or result in the loss of forest land or the conversion of forest land to non-forest use. Therefore, the Project's contribution to cumulative impacts regarding

⁸ State of California Department of Conservation, Williamson Act Program, website: <https://www.conservation.ca.gov/dlrp/wa>, accessed August 4, 2025.

agricultural resources would not be cumulatively considerable and no cumulative impacts would occur.

4.3 Air Quality

	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 information and analysis presented below is largely based on the following source (refer to Appendix C-1):

C-1 Air Quality, Energy, and Greenhouse Gas Impact Analysis, EPD Solutions, December 16, 2025.

Impact Analysis

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

Less Than Significant Impact. The Project Site is located within the 6,745-square-mile South Coast Air Basin (Basin), which includes all of Orange County and portions of Los Angeles, Riverside, and San Bernardino Counties. The South Coast Air Quality Management District (SCAQMD) is the air pollution control agency for the Basin and is required, pursuant to the Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in non-attainment (i.e., ozone [O₃]).

SCAQMD’s 2022 Air Quality Management Plan (2022 AQMP) is the regional blueprint for achieving air quality standards and healthful air. The 2022 AQMP contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by SCAG.

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties and addresses regional issues relating to transportation, the

economy, community development and the environment.⁹ With regard to future growth, SCAG has prepared the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020–2045 RTP/SCS), which provides population, housing, and employment projections for counties and cities under its jurisdiction. The growth projections in the 2020–2045 RTP/SCS are based in part on projections originating under County and City General Plans. These growth projections were utilized in the preparation of the air quality forecasts and consistency analysis included in the 2022 AQMP. The 2020-2045 RTP/SCS accounts for 4,771,300 persons; 1,793,000 households; and 2,135,900 jobs in the City by 2045.

The 2022 AQMP was adopted by the SCAQMD as a program to lead the Air Basin into compliance with several criteria pollutant standards and other federal requirements. It relies on emissions forecasts based on demographic and economic growth projections provided by SCAG’s 2020–2045 RTP/SCS. SCAG is charged by California law to prepare and approve “the portions of each AQMP relating to demographic projections and integrated regional land use, housing, employment, and transportation programs, measures and strategies.” Projects whose growth is included in the projections used in the formulation of the AQMP are considered to be consistent with the plan and not to interfere with its attainment. More specifically, SCAQMD’s CEQA Handbook provides the following two criteria to determine whether a project would be consistent with the 2022 AQMP:

1. The Project would not generate population and employment growth that would be inconsistent with SCAG’s growth forecasts from the 2020-2045 RTP/SCS; and
2. The Project would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.

Consistency Criterion No. 1 refers to the SCAG’s growth forecasts and associated assumptions included in the AQMP. The future air quality levels projected in the AQMP are based on SCAG’s growth projections, which are based in part on the general plans of cities and counties located within the SCAG region, as stated previously. Thus, if the level of housing and employment growth related to the Project is consistent with the applicable assumptions used in the development of the AQMP, the Project would not jeopardize attainment of the air quality levels identified in the AQMP.

The Project Site is presently zoned C2-1-O and is located within the Wilshire Community Plan area with a General Plan Land use designation of Community Commercial. The C2-1-O zone is a commercial zone, which permits self-storage uses with approval of a Condition Use Permit, if the site is within a 500-foot radius of a residential zone. The Project Applicant is requesting a Z Change and Height District Change from C2-1-O to C2-2-O to permit additional floor area up to a maximum Floor Area Ratio (FAR) 6:1 in lieu of 1.5:1. It is anticipated that the employment base for both the construction and operational phases of the Project would come from the existing population in the region. The Project would result in an incremental increase in employment in the City, since self-storage uses do not require a substantial number of employees for operation. (The Project would employ approximately 11 people.) In addition, the Project would not directly result in growth of the City’s population, since it is not a residential project. Thus, implementation

⁹ SCAG serves as the federally designated metropolitan planning organization (MPO) for the southern California region.

of the Project would not exceed the growth assumptions for the SCAG region. As a result, the proposed Project would be consistent with Criterion 1.

Consistency Criterion No. 2 refers to the California Ambient Air Quality Standards. An impact would occur if the long-term emissions associated with the proposed Project exceed the SCAQMD's regional significance thresholds for construction and operational emissions. As presented in **Tables 4.3-1** through **4.3-3**, the Project would not result in emitting emissions that exceed SCAQMD-established thresholds. Thus, the Project would be consistent with Criterion No. 2.

Based on all of the reasons discussed above, the Project would be consistent with the 2022 AQMP. Therefore, Project impacts related conflict with or obstruction regarding the implementation of the applicable air quality plan would be less than significant.

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

Less Than Significant Impact. As indicated above, the Project Site is located within the South Coast Air Basin, which is characterized by relatively poor air quality. State and federal air quality standards are often exceeded in many parts of the Basin, including the monitoring stations nearest to the Project Site, which exceed the most stringent ambient air quality standard for ozone and particulate matter. The Project would contribute to local and regional air pollutant emissions during construction (short-term) and Project occupancy (long-term). However, as discussed in greater detail below and in the technical reports incorporated within this document, the Project would not generate emissions in excess of applicable thresholds, and the Project would not 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. Therefore, Project impacts related to this issue would be less than significant.

Construction Impacts

Construction of the Project has the potential to create regional air quality impacts through the use of heavy-duty construction equipment and vehicle trips generated by construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from site preparation, grading, and construction activities. Mobile source emissions, primarily particulate matter and nitrogen oxides (NO_x), would result from the use of construction equipment such as loaders, graders, backhoes, and haul trucks. During the finishing phase, paving operations and the application of architectural coatings (e.g., paints) and other building materials would release volatile organic compounds (VOCs). Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

Based on criteria set forth in the SCAQMD CEQA Air Quality Handbook, a project would have the potential to violate an air quality standard or contribute substantially to an existing violation and result in a significant impact with regard to construction emissions if regional emissions from both direct and indirect sources would exceed any of the following SCAQMD prescribed threshold levels: (1) 75 pounds a day for VOCs; (2) 100 pounds per day for NO_x; (3) 550 pounds per day

for carbon monoxide (CO); (4) 150 pounds per day for sulfur oxides (SO_x); (5) 150 pounds per day for PM₁₀; and (6) 55 pounds per day for PM_{2.5}.

Regional Emissions

Regional construction-related emissions associated with heavy construction equipment were calculated using the SCAQMD recommended California Emissions Estimator Model (CalEEMod). The analysis assumes that all construction activities would comply with SCAQMD Rule 403 regarding the control of fugitive dust. As shown in **Table 4.3-1**, the Project would not generate construction-related pollutant emissions in excess of SCAQMD significance thresholds. Therefore, the Project's construction related regional air quality impacts would be less than significant.

**Table 4.3-1
Regional Construction Emissions**

Construction Year	Daily Emissions (Pounds Per Day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
2027	3.1	26.2	34.6	0.1	4.8	2.3
2028	26.1	8.5	15.9	<0.1	1.6	0.6
Maximum Total	26.1	26.2	34.6	0.1	4.8	2.3
<i>Threshold</i>	75	100	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Source: EPD Solutions, 2025. Modeling sheets included in Appendix C.						

Localized Emissions

The localized effects from on-site daily emissions were evaluated at sensitive receptor locations potentially impacted by the Project according to SCAQMD's localized significance thresholds (LST) methodology, which uses on-site mass emissions rate lookup tables and Project-specific modeling, where appropriate. SCAQMD provides LSTs applicable to the following criteria pollutants: NO_x, CO, PM₁₀, or PM_{2.5}. SCAQMD does not provide an LST for SO₂ since land use development projects typically result in negligible construction and long-term operation emissions of this pollutant. Since VOCs are not a criteria pollutant, there is no ambient standard or SCAQMD LST for VOCs. Due to the role VOCs play in O₃ formation, it is classified as a precursor pollutant, and only a regional emissions threshold has been established.

LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standards and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. The mass rate lookup tables were developed for each source receptor area and can be used to determine whether or not a project may generate significant adverse localized air quality impacts.

Estimates of maximum construction-related localized (on-site) daily emissions for NO_x, CO, PM₁₀, or PM_{2.5} are presented in **Table 4.3-2**. As shown, the Project would not generate construction-related construction emissions in excess of SCQMD's significance thresholds. Therefore, the Project's construction-related localized air quality impacts would be less than significant.

**Table 4.3-2
Localized Construction Emissions**

Construction Year	Daily Emissions (Pounds Per Day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Year 1 (2027)	24.1	28.2	3.1	1.9
Year 2 (2028)	7.2	10.4	0.2	0.2
Maximum Total	24.1	28.2	3.1	1.9
<i>Threshold</i>	90	1,125	20	6
Exceed Threshold?	No	No	No	No

Source: EPD Solutions, 2025. Modeling sheets included in Appendix C.

Operational Impacts

SCAQMD has established separate significance thresholds to evaluate potential impacts due to the incremental increase in criteria air pollutants associated with long-term operations. Regional operational emissions for the Project were calculated using CalEEMod. Inputs into the CalEEMod model include Project-related vehicle trips, as well as land uses and square footage to determine energy, water usage, and waste generation. Mobile-source emissions were calculated within CalEEMod based on data from the trip generation. In addition, the proposed land uses would result in an increase in emissions generated by energy sources (e.g., natural gas combustion) and area sources (e.g., landscape fuel combustion, consumer products, and architectural coatings).

Regional Emissions

The results of the modeled emissions calculations are provided in **Table 4.3-3**. As shown, the Project would not generate operational-related regional emissions in excess of SCAQMD's applicable significance thresholds. Therefore, the Project's operational regional air quality impacts would be less than significant.

**Table 4.3-3
Regional Operations Emissions**

Emissions Source	Daily Emissions (Pounds Per Day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Mobile	0.8	0.66	6.4	<0.1	1.5	0.4
Area	5.4	0.1	7.6	<0.1	<0.1	<0.1
Energy	<0.1	0.7	0.6	<0.1	0.1	0.1
Total	6.2	0.7	0.6	<0.1	0.1	0.1
<i>(Less Existing Total)</i>	<i>(0.8)</i>	<i>(1.1)</i>	<i>(2.1)</i>	<i>(<0.1)</i>	<i>(0.5)</i>	<i>(0.1)</i>
Net Total	5.4	0.3	12.6	<0.1	1.6	0.5
<i>Significance Threshold</i>	55	55	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No

Source: EPD Solution, 2025. Modeling sheets included in Appendix C.

Localized Emissions

As shown in **Table 4.3-4**, the Project would not generation operational-related localized emissions in excess of SCAQMD’s applicable significance thresholds. Therefore, the Project’s operational localized air quality impacts would be less than significant.

**Table 4.3-4
Localized Operations Emissions**

Emissions Source	Daily Emissions (Pounds Per Day)			
	NO _x	CO	SO _x	PM _{2.5}
Mobile	0.2	1.5	<0.1	<0.1
Area	0.1	7.6	<0.1	<0.1
Energy	0.7	0.6	<0.1	0.1
Total	1.0	9.7	0.1	0.1
<i>Significance Threshold</i>	74	882	4	2
Exceed Threshold?	No	No	No	No

Source: EPD Solution, 2025. Modeling sheets included in Appendix C.

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

Less Than Significant Impact. Certain population groups are especially sensitive to air pollution and should be given special consideration when evaluating potential air quality impacts. These population groups include children, the elderly, persons with pre-existing respiratory or cardiovascular illness, and athletes or others who engage in frequent exercise. As defined in the SCAQMD CEQA Air Quality Handbook, a sensitive receptor to air quality is defined as any of the following land use categories: (1) long-term health care facilities; (2) rehabilitation centers; (3) convalescent centers; (4) retirement homes; (5) residences; (6) schools (i.e., elementary, middle school, high schools); (7) parks and playgrounds; (8) child care centers; and (9) athletic fields. The closest sensitive receptors to the Project Site are multi-family residential uses located approximately 165 feet north of the site.

As discussed above, construction and operation of the Project would result in less-than-significant impacts relative to both regional and localized air pollution emissions. Therefore, the Project would not expose sensitive receptors to substantial pollutant concentrations. In addition, Project construction activities would comply with SCAQMD Rule 403 regarding the control of fugitive dust and other specified dust control measures. As such, impacts to off-site sensitive receptors would be less than significant, and no mitigation measures are required.

When considering potential air quality impacts under CEQA, consideration is given to the location of sensitive receptors within close proximity of land uses that emit toxic air contaminants (TACs). The California Air Resources Board (CARB) has published and adopted the Air Quality and Land Use Handbook: A Community Health Perspective (2005), which provides recommendations regarding the siting of new sensitive land uses near potential sources of air toxic emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities). SCAQMD adopted similar recommendations in its

Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. Together the CARB and SCAQMD guidelines recommend siting distances for both the development of sensitive land uses in proximity to TAC sources and the addition of new TAC sources in proximity to existing sensitive land uses.

The Project would not include any sources of TACs such as generators, boilers or any other combustion sources. As the Project would not contain substantial TAC sources and is consistent with the CARB and SCAQMD guidelines, the Project would not result in the exposure of off-site sensitive receptors to carcinogenic or TACs that exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0, and potential TAC impacts would be less than significant.

The SCAQMD recommends a Health Risk Assessment (HRA) for substantial sources of diesel particulate matter such as warehouse distribution and cold storage facilities. No such facilities are located in proximity to the Project Site, and the Project does not propose any such uses. As such, a HRA was not required for the Project.

Based on the above, the Project would not expose sensitive receptors to substantial pollutant concentrations, and impacts would be less than significant.

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

Less Than Significant Impact. No objectionable odors are anticipated as a result of either construction or operation of the Project. Specifically, construction of the Project would involve the use of conventional building materials typical of construction projects of similar type and size. Any odors that may be generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of people.

With respect to Project operation, according to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project will introduce a storage use to the area but would not result in activities that create objectionable odors. On-site trash receptacles would be contained, located, and maintained in a manner that promotes odor control, and would not result in substantially adverse odor impacts.

Construction and operation of the Project would also comply with SCAQMD Rules 401, 402, and 403, regarding visible emissions violations. In particular, SCAQMD Rule 402 provides that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

Based on the above, construction and operation of the Project would not result in other emissions, such as those leading to odors, adversely affecting a substantial number of people. Therefore, Project impacts related to odors would be less than significant.

Cumulative Impacts

According to SCAQMD, individual projects that do not exceed SCAQMD's recommended daily thresholds for project-specific impacts would not contribute a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is in non-attainment. As discussed above, the Project's construction and operational pollutant emissions would not exceed any of the applicable significance thresholds. Therefore, the Project's contribution to cumulative air quality impacts would not be cumulatively considerable.

4.4 Biological Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 U.S. 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 checked="" type="checkbox"/>	<input 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 type="checkbox"/>	<input checked="" 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"/>

Impact Analysis

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

No Impact. The Project Site and surrounding area are developed with urban uses. No vegetation or other biological resources are located on the Project Site. Thus, the Project would not 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. Therefore, no impacts related to this issue would occur as a result of the Project.

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

No Impact. The Project Site and surrounding area are developed with urban uses. No riparian habitat or other sensitive natural communities are located on the Project Site. Thus, the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Therefore, no impacts related to this issue would occur as a result of the Project.

c) Would the project 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 and surrounding area are developed with urban uses. No wetlands are located on the Project Site. Thus, the Project would not have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. Therefore, no impacts related to this issue would occur as a result of the Project.

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

Less Than Significant Impact. The Project Site and surrounding area are developed with urban uses, do not contain any water sources, and are not part of a migratory wildlife corridor. Additionally, the Project Site is not located near any native wildlife nursery sites.

The Project Site is located in an urbanized area. There are no on-site trees. There are two (2) street trees (southern magnolia) along Longwood Avenue and three (3) street trees (one purple orchid tree and two Japanese privet) along San Vicente Boulevard.¹⁰ None of the existing street trees are protected trees or shrubs as defined by the City.¹¹ The Project includes removal of the

¹⁰ City of Los Angeles, StreetsLA: <https://streetsla.lacity.org/tree-inventory>, accessed July 3, 2025.

¹¹ LAMC Section 46.01: "PROTECTED TREE OR SHRUB" means any of the following Southern California indigenous tree species, which measures four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree, or any of the following Southern California indigenous shrub species, which measures four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the shrub: Protected Trees: (a) Oak tree including Valley Oak (*Quercus lobata*) and California Live Oak (*Quercus agrifolia*), or any other tree of the oak genus indigenous to California but excluding the Scrub Oak (*Quercus berberidifolia*); (b) Southern California Black Walnut (*Juglans californica*); (c) Western Sycamore (*Platanus racemosa*); (d) California Bay (*Umeellularia californica*). Protected Shrubs: (a) Mexican Elderberry (*Sambucus mexicana*); (b) Toyon (*Heteromeles arbutifolia*). This definition shall not include any tree or shrub grown or held for sale by a licensed nursery, or trees or shrubs planted or grown as a part of a planting program.

two southern magnolia street trees and replacement of these street trees at a 2:1 ratio in accordance with City standards. The remaining street trees would be protected in place.

Because these trees could contain nesting birds (depending on the time of year), the Project Applicant would be required to comply with the Migratory Bird Treaty Act (MBTA) (Title 33, United States Code, Section 703 et seq., see also Title 50, Code of Federal Regulation, Part 10) and Section 3503 of the California Department of Fish and Wildlife Code, which regulates vegetation removal during the nesting season (February 15th to August 15th) to ensure that no significant impacts to migratory birds would occur. Thus, the Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Therefore, Project impacts related to this issue would be less than significant.

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

No Impact. The City of Los Angeles Protected Tree and Shrub Relocation and Replacement Ordinance (Ordinance No. 177,404, as amended by Ordinance No. 186,873, adopted February 4, 2021) (Protected Tree and Shrub Ordinance) regulates the relocation or removal of all Southern California native oak trees (excluding scrub oak), California black walnut trees, Western sycamore trees, California bay trees, Mexican elderberry shrubs, and toyon shrubs, of at least 4 inches in diameter at 4.5 feet above the ground level at the base of the tree or shrub.¹²

The Project Site is located in an urbanized area. As noted previously and in the Tree Report incorporated within this document, there are no on-site trees. There are two (2) street trees (southern magnolia) along Longwood Avenue and three (3) street trees (one purple orchid tree and two Japanese privet) along San Vicente Boulevard. None are protected trees or shrubs as defined by the City. The Project includes removal of the two southern magnolia street trees and replacement of these street trees at a 2:1 ratio in accordance with City standards. The remaining street trees would be protected in place. Thus, the Project would not conflict with any local policies or ordinances protecting biological resources. Therefore, no impacts related to this issue would occur as a result of the Project.

(It might be also helpful to refer to a completed “Applicant’s Declaration of Biological Resources” and “Tree Disclosure Statement” form. Please provide the signed documents which can be found here:

https://planning.lacity.gov/odocument/f743e937-e944-4783-b163-543073d6a119/Owners_Declaration_of_Biological_Resources.pdf

¹² Pursuant to the Ordinance No. 186,873 and as defined in LAMC Section 17.02, a protected tree or shrub includes any of the following Southern California indigenous tree species, which measure 4 inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree, or any of the following Southern California indigenous shrub species, which measure 4 inches or more in cumulative diameter, 4.5 feet above the ground level at the base of the shrub: Oak tree; Southern California Black Walnut tree; Western Sycamore tree; California Bay tree; Mexican Elderberry shrub; and Toyon shrub.

https://planning.lacity.gov/odocument/8bf21b33-41e7-4843-9f03-5042e2795035/Tree_Disclosure_Statement.pdf

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

No Impact. The Project Site is not within the boundaries of an adopted habitat conservation plan, natural community conservation plan, or other approved habitat conservation plan. Thus, the Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, no impacts related to this issue would occur as a result of the Project.

Cumulative Impacts

There are three (3) related projects identified by the City within 0.5 miles of the Project (see **Table 4.21-1**). The Project Site and the sites of the related projects are either currently developed or have previously been developed and subject to grading and other ground-disturbing activities. Also, the Project Site and the sites of the related projects are substantially surrounded by urban development and do not contain any sensitive habitat, riparian habitat, wetlands, and are not part of a native wildlife migratory corridor. As with the Project, any trees removed as part of the related projects would be required by the City to occur in accordance with applicable City requirements for protected trees (if applicable) and street trees and the Migratory Bird Treaty Act. Therefore, cumulative impacts related to biological resources would be less than significant.

4.5 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 type="checkbox"/>	<input checked="" 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 information and analysis presented below is largely based on the following source (refer to Appendix D):

D Cultural Resources Assessment, BCR Consulting, September 14, 2025

Impact Analysis

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

No Impact. BCR Consulting (BCR) prepared a Cultural Resources Assessment for the Project (refer to Appendix D) to determine, in part, whether the Project would result in a substantial adverse change in the significance of a historical resource under CEQA. The assessment noted that the existing building on the Project Site is of historic age (i.e., older than 50 years old), and two (2) other known historical resources are located in the vicinity of the Project Site. These are all discussed below.

Significance Criteria

The California Register of Historical Resources (California Register) criteria are based on the National Register of Historic Places (National Register) criteria. For a property to be eligible for inclusion on the California Register or as a City Landmark, one or more of the following criteria must be met:

1. It is associated with the events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the U.S.;
2. It is associated with the lives of persons important to local, California, or U.S. history;

3. It embodies the distinctive characteristics of a type, period, region, or method of construction, represents the work of a master, possesses high artistic values; and/or
4. It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

In addition to meeting one or more of the above criteria, the California Register requires that sufficient time has passed since a resource's period of significance to "obtain a scholarly perspective on the events or individuals associated with the resources." (CCR 4852 [d][2]). The California Register also requires that a resource possess integrity. This is defined as the ability for the resource to convey its significance through seven aspects: location, setting, design, materials, workmanship, feeling, and association.

Evaluations

Building at 4800 San Vicente Boulevard (Project Site)

Criterion 1: The Hollywood Clothes business existed within the Great Depression and the post-World War II expansion years of the 1950s. The business was established at its original location in the Garment District at the end of the 1920s, during a period of expansion for this industry, and remained viable through the Great Depression. The business was notable for ending its union affiliation during an era when many unions were expanding. Although the early era of Hollywood Clothes is interesting, there is no physical connection between the Project Site and 1920s expansion of clothing manufacturers or the Great Depression. Thus, the business cannot be significantly associated with events from that time. Its expansion during the 1950s was typical of local clothing manufacturers' tendency to modernize and emphasize wholesale trade. Research has not revealed any evidence to suggest that the building on the Project Site represents a significant contribution to this expansion. As a result, the building is not significantly associated with events that have contributed to the broad patterns of the area, California, or the U.S. and does not appear eligible for listing on the California Register under Criterion 1.

Criterion 2: The building was designed by a well-known engineer, Donald R. Warren. Warren designed many more substantial and/or elaborate structures such as dams and bridges. A simple, small, utilitarian, tilt-up industrial building, a type of building which was very commonly constructed at the time, is not a unique or exceptional example of the work for which he was known. Charles Lyons, the owner of Hollywood Clothes, was a successful local businessman, but there is no evidence that he made important contributions within any historical contexts explored here. No other notable individuals were associated with the building. Therefore, the building on the Project Site does not appear to be eligible for listing on the California Register under Criterion 2.

Criterion 3: This building was designed and built using a ubiquitous and utilitarian Mid-Century Modern style commonly utilized in industrial buildings of the period. Thus, the building does not embody the distinctive characteristics of a type, period, region, or method of construction and does not appear eligible for listing on the California Register under Criterion 3.

Criterion 4: The building was thoroughly assessed in the Cultural Resources Assessment and has not and is not likely to yield information important to prehistory or history. The building at the Project Site does not appear eligible for listing to the California Register under Criterion 4.

Based on all of the information presented above, the building on the Project Site does not appear to be eligible for listing in the California Register. Thus, the building on the Project Site is not a significant historical resource under CEQA.

Los Angeles Department of Water and Power Station No. 8.

The Los Angeles Department of Water and Power Station No. 8 is located across the street to the west of the Project Site, in the impact area (as defined by the City of Los Angeles Planning). This building was constructed in 1939 and has been determined significant by the Los Angeles Historic Resources Inventory. Thus, the building is a significant historical resource under CEQA. Most of the surrounding buildings and landscape features from this era have been removed or are not recognizable. As a result, the neighborhood does not appear to possess any characteristics that convey this resource's historical significance, and development of the Project would not result in a substantial adverse effect to this historical resource.

San Vicente Boulevard Median

The San Vicente Boulevard Median is located across the street to the north of the Project Site, in the impact area (as defined by the City of Los Angeles Planning). This is a landscaped median that was built between 1955 and 1961 within the alignment of the former streetcar tracks. It is a “prominent visual landmark” and has been determined eligible by the Los Angeles Historic Resources Inventory and is considered a significant historical resource under CEQA. When the San Vicente Boulevard Median was constructed, the neighborhood to the north and west were primarily residential and the neighborhood to the south and east were commercial and industrial. Development of the Project would carry on the commercial/industrial character that the site currently occupies and would not create any visual impairment to or from the median that are not already present. Therefore, indirect impacts to the San Vicente Boulevard Median would not occur as a result of the Project, and development of the Project would not result in a substantial adverse effect to this historical resource.

Conclusion

Based on all of the information presented above, the Project would not cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5. Therefore, no impacts related to this issue would occur as a result of the Project.

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

Less Than Significant Impact. CEQA Guidelines Section 15064.5(a)(3)(D) generally defines archaeological resources as any resource that “has yielded, or may be likely to yield, information important in prehistory or history.” Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community.

The Project Site is located within an urbanized area of the City and has been subject to grading, excavation and fill activities, and development in the past. The Project would involve grading for the foundation elements, and grading of soils. Because the Project Site has undergone previous

grading associated with the existing building, any new archaeological survey is unlikely to observe surface artifacts.

Disturbances associated with previous excavation and construction of the existing historic period building at the project site have been severe and have disrupted soil beyond depths at which buried cultural resources are likely. And no significant buried cultural resources have been recorded in the vicinity of the project site. As a result, the potential to encounter in-situ remains associated with significant archaeological materials during project-related excavation is low.

Nevertheless, since the Project would include ground-disturbing activities, there is potential for an archaeological site to be identified during construction activities associated with the Project. Thus, standard measures would be implemented to address the inadvertent discovery of archaeological resources.

Although none were yielded during the field survey, record search results show historic-period resources are in close proximity to the project site and ground-disturbing activities have the potential to reveal buried deposits not observed on the surface. Prior to the initiation of ground-disturbing activities, field personnel should be alerted to the possibility of buried prehistoric or historic cultural deposits. In the event that field personnel encounter buried cultural materials, work in the immediate vicinity of the find should cease and a qualified archaeologist should be retained to assess the significance of the find. The qualified archaeologist should have the authority to stop or divert construction excavation as necessary. If the qualified archaeologist finds that any cultural resources present meet eligibility requirements for listing on the California Register or the National Register of Historic Places (National Register), plans for the treatment, evaluation, and mitigation of impacts to the find will need to be developed.

The Project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines Section 15064.5. Therefore, impacts would be less than significant.

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

Less Than Significant Impact. The Project Site has been subject to previous grading and development associated with the building. No known traditional burial sites have been identified on-site. In addition, if human remains were discovered during construction of the Project, work in the immediate vicinity would be halted, the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5, and disposition of the human remains, and any associated grave goods would occur in accordance with Public Resources Code Section 5097.91 and 5097.98.

In addition, as outlined under Checklist Section 18, Tribal Cultural Resources, if the coroner determines or has reason to believe the remains are those of a Native American, the coroner must contact the Native American Heritage Commission (NAHC) within 24 hours (Section 7050.5(c)).

With the implementation of regulatory requirements, potential impacts associated with the disturbance of human remains, including those interred outside of dedicated cemeteries, would be less than significant.

(Refer to Checklist Section 18, Tribal Cultural Resources, regarding the Project's potential impacts to tribal cultural resources.)

Cumulative Impacts

There are three (3) related projects identified by the City within 0.5 miles of the Project (see **Table 4.21-1**). None of the related projects share proximity with the same historical or potentially historical resources. Additionally, the potential for archaeological resources and human remains to occur at a site is site-specific. As with the Project, in the event that archaeological resources and/or human remains are uncovered, each Related Project would be required to comply with applicable regulatory requirements. Further, as part of the environmental review processes for the related projects, it is expected that measures would be established or the City's standard Condition of Approval regarding inadvertent discovery of archaeological or tribal cultural resources would be applied, as necessary. Therefore, cumulative impacts related to cultural resources would be less than significant.

4.6 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"/>

Impact Analysis

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

Less Than Significant Impact. With regard to Energy Threshold (a), this analysis relies upon Appendix F of the CEQA Guidelines as well as the *L.A. CEQA Thresholds Guide*. Appendix F of the CEQA Guidelines was prepared in response to the requirement in PRC Section 21100(b)(3), which states that an EIR shall include a detailed statement setting forth “[m]itigation measures proposed to minimize significant effects of the environment, including, but not limited to, measures to reduce the wasteful, inefficient, and unnecessary consumption of energy.” In addition, with regard to potential impacts to energy, the *L.A. CEQA Thresholds Guide* states that a determination of significance shall be made on a case-by-case basis, considering the following factors:

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

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

- a) *The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed;*
- b) *The effects of the project on local and regional energy supplies and on requirements for additional capacity;*
- c) *The effects of the project on peak and base period demands for electricity and other forms of energy;*
- d) *The degree to which the project complies with existing energy standards;*
- e) *The effects of the project on energy resources;*
- f) *The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.*
- g) *The degree to which the project design and/or operations incorporate energy-conservation measures, particularly those that go beyond City requirements.*
- h) *Whether the Project conflicts with adopted energy conservation plans.*

The following analysis considers these eight criteria (a through h) in the analysis below.

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

The Project would consume energy during construction and operational activities. Sources of energy for these activities would include electricity usage, natural gas consumption, and transportation fuels such as diesel and gasoline. The analysis below includes the Project's energy requirements and energy use efficiencies by fuel type for each stage of the Project (construction, operations, and maintenance activities). For purposes of this analysis, Project maintenance would include activities such as repair of structures, landscaping and architectural coatings. Energy usage related to Project maintenance activities are assumed to be included as part of Project operations.

Construction

During Project construction, energy would be consumed in the form of electricity associated with the conveyance of water used for dust control and, on a limited basis, powering lights, electronic equipment, or other construction activities necessitating electrical power. As discussed below, construction activities, including the construction of the new buildings, typically do not involve the consumption of natural gas. Project construction would also consume energy in the form of petroleum-based fuels associated with the use of offroad 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., hauling of demolition material to off-site reuse and disposal facilities).

Electricity

Electricity would be supplied to the Project Site by LADWP and would be obtained from both existing infrastructure serving the Project Site and gas and/or diesel-powered portable generators, as required. 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. In addition, although Title 24 requirements typically apply to energy usage for buildings, long-term construction lighting (greater than 120 days) providing illumination for the Project Site and staging areas would also comply with applicable Title 24 requirements (includes limits on the wattage allowed per specific area), which would result in the conservation of energy. Therefore, the use of electricity during project construction would be minimal and would not be wasteful, inefficient, or unnecessary.

Natural Gas

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

Operation

During operation of the Project, energy would be consumed for multiple purposes, including, but not limited to HVAC; refrigeration; lighting; and the use of electronics, equipment, and machinery. Energy would also be consumed during Project operations related to water usage, solid waste disposal, and vehicle trips. The Project would increase electrification by installing space heating, water heating and residential appliances (cooking, clothes dryers) powered by electricity while restaurant cooking will be powered by natural gas.

Electricity

As the Project would comply with Title 24 standards and applicable requirements of the City's Green Building Code, buildout of the Project would result in a projected net increase in the on-site demand for electricity. Based on LADWP's 2022 Resource Plan, LADWP forecasts that its total energy demand in 2029 (the Project's projected first operation year) will be 22,339 gigawatt hour (GWh) of electricity.¹³ In addition, LADWP is committed to ensuring the sustainability of its power supply, and is required to procure at least 60 percent by 2030, which will ensure that projected supplies will be more than sufficient to meet demand.

Natural Gas

The Southern California Gas Company (SoCal Gas) provides natural gas service to the Project Site vicinity. With compliance of Title 24 standards and applicable requirements of the City's Green Building Code, buildout of the Project is anticipated to generate an increase in the on-site

13 California Energy Demand Forecast, 2021-2035, LADWP High Demand Case: <https://www.energy.ca.gov/filebrowser/download/3930> and LADWP, 2022 Final Power Strategic Long-Term Resource Plan. https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-integratedresourceplanning?_adf.ctrl-state=2o233f8ir_86&_afLoop=433722383789167, accessed June 12, 2025.

demand for natural gas totaling approximately 920,871 cubic feet (cf) per year, or approximately 2,522 cf per day. Based on the 2024 California Gas Report, the California Energy and Electric Utilities estimates natural gas capacity available within SoCal Gas’s planning area will be approximately 2.16 billion cf per day in 2029.¹⁴ The Project would be within the forecasted 2029 consumption in SoCal Gas’s planning area.

Transportation Energy

During operation, Project-related traffic would result in the consumption of petroleum-based fuels related to vehicular travel to and from the Project Site. The Project Site is located adjacent to a Job Center, High Quality Transit Area (HQTA) and a Neighborhood Mobility Area (NMA), as designated by SCAG, which indicates that the Project Site is an appropriate site for increased employment opportunities from a “smart growth” regional planning perspective.¹⁵ Extensive public bus service is provided within the Project study area. The existing transit services in the vicinity of the Project Site would provide Project employees, and visitors with various public transportation opportunities in lieu of driving. As such, operational impacts to transportation energy would be less than significant.

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

Construction

As discussed above, electricity would be intermittently consumed during the conveyance of the water used to control fugitive dust, as well as to provide electricity for temporary lighting and other general construction activities. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. The estimated construction electricity usage represents far less than the estimated net annual operational demand which, as discussed below, would be within the supply and infrastructure service capabilities of LADWP. Furthermore, the electricity demand during construction would be somewhat offset with the removal of the existing on-site uses which currently generate a demand for electricity. Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be supplied to support Project construction activities. Thus, there would be no demand generated by construction. Transportation fuel usage during Project construction activities would represent approximately 0.01 percent of gasoline usage and approximately 0.04 percent of diesel usage within Los Angeles County, respectively.¹⁶ As energy consumption during Project construction activities would be relatively negligible, the Project would not likely affect regional energy consumption during the construction period.

¹⁴ California Gas and Electric Utilities, 2024 California Gas Report.

¹⁵ According to the 2020–2045 RTP/SCS an HQTA is a corridor-focused Priority Growth Area (PGA) within 0.5 mile of an existing or planned fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes (or less) during peak commuting hours; an NMA is a PGA with a high number of intersections, low observed travel speed, high mix of uses and high accessibility to “everyday” destinations where complete streets and sustainability policies support and encourage replacing or reducing single and multi-occupant automobile use.

¹⁶ California Air Resources Board, EMFAC2021 Web Database, www.arb.ca.gov/emfac

Operation

The 2022 Power Strategic Long-Term Resource Plan (SLTRP) serves as a comprehensive roadmap through 2045 that guides the Los Angeles Department of Water and Power's (LADWP) Power System. The 2022 SLTRP describes how the City will achieve 100 percent carbon-free energy by 2035.¹⁷ In 2022-2023, the LADWP supplied 21,600 gigawatt-hours (gWh) of power.¹⁸ Furthermore, LADWP has confirmed that the Project's electricity demand can be served by the facilities in the Project area (Appendix I of the Strategic Long-Term Resources Plan).

Based on the 2024 California Gas Report, the California Energy and Electric Utilities estimates natural gas consumption within SoCal Gas's planning area will be approximately 2.16 billion cf per day in 2029.¹⁹ The Project would be within the forecasted 2029 consumption in SoCal Gas's planning area.

As energy consumption during Project operations would be relatively negligible and energy requirements are within LADWP's and SoCal Gas' service provision, Project operational impacts on energy usage would be less than significant.

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

As discussed above, electricity demand during construction and operation of the Project would have a negligible effect on the overall capacity of LADWP's power grid and base load conditions. In addition, LADWP's annual growth projection in peak demand of the electrical power grid of 0.3 percent would be sufficient to account for future electrical demand by the Project.²⁰ Therefore, Project electricity consumption during operational activities would have a negligible effect on load conditions of the power grid.

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

Although Title 24 requirements typically apply to energy usage for buildings, long-term construction lighting (greater than 120 days) providing illumination for the Project Site and staging areas would also comply with applicable Title 24 requirements (includes limits on the wattage allowed per specific area). In addition, construction equipment would comply with energy efficiency requirements contained in the Federal Energy Independence and Security Act or previous Energy Policy Acts for electrical motors and equipment.²¹ Electricity and Natural Gas usage during Project operations would comply with Title 24 standards and applicable CalGreen requirements and Los Angeles Green Building Code. Therefore, Project construction and operational activities would comply with existing energy standards with regards to electricity and natural gas usage.

17 LADWP, 2022 Final Power Strategic Long-Term Resource Plan: <https://www.ladwp.com/who-we-are/power-system/strategic-long-term-resource-plan>, accessed August 4, 2025.

18 LADWP, Power System: <https://www.ladwp.com/who-we-are/power-system>, accessed August 4, 2025.

19 California Gas and Electric Utilities, 2024 California Gas Report.

20 LADWP, 2018 Retail Electric Sales and Demand Forecast.

21 Energy Independence and Security Act of 2007, Public Law 110-140.

With regard to transportation fuels, trucks and equipment used during proposed construction activities, the Project would comply with CARB's anti-idling regulations as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. Although these regulations are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in efficient use of construction-related energy. During Project operations, vehicles travelling to and from the Project Site are assumed to comply with CAFE fuel economy standards, as required.

Based on the above, Project construction and operational activities would comply with existing energy standards with regards to electricity and natural gas usage, as well as transportation fuel consumption.

e) Effects of the Project on Energy Resources

LADWP's electricity generation is derived from a mix of non-renewable and renewable sources such as coal, natural gas, solar, geothermal wind and hydropower. The LADWP's most recently adopted 2022 Power Strategic Long-Term Resources Plan identifies adequate resources (natural gas, coal) to support future generation capacity through 2045.²²

Natural gas supplied to the Southern California is mainly sourced from out of state with a small portion originating in California. Sources of natural gas for the Southern California region are obtained from locations throughout the western United States as well as Canada.²³ According to the U.S. Energy Information Administration (EIA), the United States currently has over 86 years of natural gas reserves.²⁴ Compliance with energy standards is expected to result in more efficient use of natural gas (lower consumption) in future years. Therefore, Project construction and operation activities would have a negligible effect on natural gas supply.

Transportation fuels (gasoline and diesel) are produced from crude oil which is imported from various regions around the world. Based on current proven reserves, crude oil production would be sufficient to meet consumption through 2050.²⁵ The Project would also comply with CAFE fuel economy standards, which would result in more efficient use of transportation fuels (lower consumption). Therefore, Project construction and operation activities would have a negligible effect on the transportation fuel supply.

As discussed above, LADWP is required to procure at least 50 percent of their energy portfolio from renewable sources by 2030. The current sources of renewable energy procured by LADWP include wind, solar, and geothermal sources. These sources account for 35.6 percent of LADWP's overall energy mix in 2022, the most recent year for which data are available.²⁶ This represents the available off-site renewable sources of energy that would meet the Project's energy demand.

²² LADWP, 2022 Final Power Strategic Long-Term Resource Plan: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-integratedresourceplanning?_adf.ctrl-state=2o233f8ir_86&_afLoop=433722383789167, accessed August 4, 2025.

²³ California Gas and Electric Utilities, 2020 California Gas Report.

²⁴ U.S. Energy Information Administration, Frequently Asked Questions, www.eia.gov/tools/faqs/faq.php?id=58&t=8, accessed August 4, 2025.

²⁵ U.S. Energy Information Administration, Frequently Asked Questions, www.eia.gov/tools/faqs/faq.php?id=38&t=6, accessed August 4, 2025.

²⁶ LADWP Annual Power Content Labels for 2022, <https://www.ladwp.com/who-we-are/power-system/power-content-label>, accessed August 4, 2025.

With regard to on-site renewable energy sources, the Project would include the provision of conduit that is appropriate for future photovoltaic and solar thermal collectors. However, due to the Project Site's location, other on-site renewable energy sources would not be feasible to install on-site as there are no local sources of energy from the following sources: biodiesel, biomass hydroelectric and small hydroelectric, digester gas, methane, fuel cells, landfill gas, municipal solid waste, ocean thermal, ocean wave, and tidal current technologies, or multi-fuel facilities using renewable fuels. Furthermore, wind-powered energy is not viable on the Project Site due to the lack of sufficient wind in the Los Angeles basin. Specifically, based on a map of California's wind resource potential, the Project Site is not identified as an area with wind resource potential.²⁷

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

As discussed above, the Project would include project features to reduce VMT during operational activities. The Project design, which includes dedicated bicycle parking facilities and an improved streetscape with pedestrian amenities, also encourages non-automotive forms of transportation such as walking or biking to destinations. In addition, the Project would be located in close proximity to multiple existing and future transit stops. Therefore, the Project would encourage the use of efficient transportation alternatives.

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

The current City of LA Green Building Code requires compliance with CalGreen and California's Building Energy Efficiency Standards (Title 24). Use of energy efficient materials, lighting and heating and cooling systems would reduce the Project's greenhouse gas (GHG) emissions.

Therefore, the Project would incorporate measures that are above and beyond current State and City energy conservation requirements.

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

With implementation of these features along with complying with state and local energy efficiency standards, the Project would meet and/or exceed all applicable energy conservation policies and regulations.

²⁷ California Energy Commission, Systems Assessment & Facilities Siting Division Cartography Unit, California Wind Resource Potential Map.

h) Whether the Project conflict with adopted energy conservation plans

As discussed under Checklist Section 8, Greenhouse Gas Emissions, the City has published its LA Green Plan/ClimateLA in 2007 as well as the Green New Deal in 2020, which outline goals and actions by the City to reduce GHG emissions. To facilitate implementation of the LA Green Plan/Climate LA, the City adopted the Green Building Code. The Project would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the 2022 CALGreen Code and California's Building Energy Efficiency Standards, which have been incorporated into the City's Green Building Code.

With regard to transportation uses, the Project design would reduce the VMT throughout the region and encourage use of alternative modes of transportation. The Project would be consistent with regional planning strategies that address energy conservation. As discussed above and under Item 11, Land Use and Planning, SCAG's 2020–2045 RTP/SCS focuses on creating livable communities with an emphasis on sustainability and integrated planning, and identifies mobility, economy, and sustainability as the three principles most critical to the future of the region. As part of the approach, the 2020–2045 RTP/SCS focuses on reducing fossil fuel use by decreasing VMT, reducing building energy use, and increasing use of renewable sources.

The Project would be consistent with the energy efficiency policies emphasized in the 2020–2045 RTP/SCS. Most notably, the Project would be an infill mixed-use development developed within an HQT, and NMA and adjacent to a Job Center. The Project would provide greater proximity to neighborhood services, jobs, and residences and would be well-served by existing public transportation, including Metro bus lines.

The introduction of new job opportunities within an HQT, as proposed by the Project, is consistent with numerous policies in the 2020–2045 RTP/SCS related to locating new housing and jobs near transit. The 2020–2045 RTP/SCS would result in an estimated 19 percent decrease in VMT by 2035. As discussed above, OPR recommended that achieving 15 percent lower per capita (residential or employee) VMT than existing development is both generally achievable and is supported by evidence that connects this level of reduction to the State's emissions goals (i.e., SB 375 goal).

With regard to transportation uses, the Project design would reduce the VMT throughout the region and encourage use of alternative modes of transportation. The Project would be consistent with regional planning strategies that address energy conservation. As discussed above and under Checklist Section 11, Land Use and Planning, SCAG's 2020–2045 RTP/SCS and 2024-2050 RTP/SCS focuses on creating livable communities with an emphasis on sustainability and integrated planning, and identifies mobility, economy, and sustainability as the three principles most critical to the future of the region. As part of the approach, the 2020–2045 RTP/SCS and 2024-2050 RTP/SCS focuses on reducing fossil fuel use by decreasing VMT, reducing building energy use, and increasing use of renewable sources.

The Project would be consistent with the energy efficiency policies emphasized in the 2020–2045 RTP/SCS. Most notably, the Project would be an infill development developed within an HQT, TPA, and NMA and adjacent to a Job Center. The Project would provide greater proximity to neighborhood services, jobs, and residences and would be well-served by existing public transportation, including Metro bus lines.

The introduction of new job opportunities within an HQTAs, as proposed by the Project, is consistent with numerous policies in the 2020–2045 RTP/SCS and 2024-2050 RTP/SCS related to locating new housing and jobs near transit. The 2020–2045 RTP/SCS and 2024-2050 RTP/SCS would result in an estimated 19 percent decrease in VMT by 2035. As discussed above, OPR recommended that achieving 15 percent lower per capita (residential or employee) VMT than existing development is both generally achievable and is supported by evidence that connects this level of reduction to the State’s emissions goals (i.e., SB 375 goal).

In addition, the Project would comply with State energy efficiency requirements, and would use electricity from LADWP, which has a current renewable energy mix of 35 percent. All of these features would serve to reduce the consumption of electricity, natural gas, and transportation fuel. Based on the above, the Project would be consistent with adopted energy conservation plans.

Conclusion

As demonstrated in the analysis above, the Project’s energy requirements would not significantly affect local and regional supplies or capacity. The Project’s energy usage during base and peak periods would be consistent with electricity and natural gas future projections for the region. Electricity generation capacity and supplies of natural gas and transportation fuels would be sufficient to meet the needs of Project-related construction and operational activities. During construction the Project would comply with Title 24 energy efficiency standards where applicable resulting in efficient use of energy. During operations, the Project would comply with applicable energy efficiency requirements such as CalGreen, as well as include energy conservation measures beyond requirements.

Specifically, the Project would incorporate multiple green building and energy efficiency measures in compliance with CALGreen and the LA Green Building Code. In addition, the Project would provide electric vehicle charging stations and infrastructure as well as bicycle parking spaces in compliance with LAMC requirements.

Thus, overall, the Project would not result in potentially significant environmental impacts due to wasteful, inefficient, and unnecessary consumption of energy resources during construction or operation, and impacts would be less than significant.

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

Less Than Significant Impact. The Project was evaluated for consistency with adopted energy conservation plans and policies relevant to the Project. Such adopted energy conservation plans and policies include Title 24 energy efficiency requirements, CalGreen and City building codes. Also, as discussed under Checklist Section 8, Greenhouse Gas Emissions, of this MND, the Project would also be consistent with the SCAG RTP/SCS which includes goals to reduce VMT and corresponding decrease in fuel consumption.

The Project would be subject to the energy conservation requirements of the California Energy Code (Title 24 of the California Code of Regulations, Part 6) and the California Green Building Standards Code (24 CCR part 11). The California Energy Code provides energy conservation standards for all new and renovated commercial buildings constructed in California. The Code

applies to the building envelope, space-conditioning systems, and water-heating and lighting systems of buildings and appliances. The Code provides guidance on construction techniques to maximize energy conservation. Minimum efficiency standards are given for a variety of building elements, including appliances; water and space heating and cooling equipment; and insulation for doors, pipes, walls and ceilings. The Code also emphasizes saving energy at peak periods and seasons and improving the quality of installation of energy efficiency measures. In addition, the California Green Building Standards Code sets targets for: energy efficiency; water consumption; dual plumbing systems for potable and recyclable water; diversion of construction waste from landfills; and use of environmentally sensitive materials in construction and design, including eco-friendly flooring, carpeting, paint, coatings, thermal insulation, and acoustical wall and ceiling panels.

The City adopted and released the City's first ever Sustainable City pLAN, which set short-term and long-term energy and conservation targets geared towards advancing the City's economy and equity. In 2019, the City prepared the 2019 Green New Deal, which provided an expanded vision of the pLAN, focusing on securing clean air and water and a stable climate, improving community resilience, expanding access to healthy food and open space, and promoting environmental justice for all. Through the Green New Deal, the City would cut an additional 30 percent in GHG emissions above and beyond the 2015 pLAN to ensure that the City stays within its carbon budget between now (2022) and 2050.²⁸

A consistency analysis is provided under Checklist Section 8, Greenhouse Gas Emissions, which outlines specific policies of the Green New Deal that the Project would be consistent with. To summarize, the Project would be required to comply with the Title 24 standards for Energy Efficiency and Conservation that are in effect at the time of development. In addition, per compliance with the California Energy Code, the Project would allocate roof area for future solar panels.

Incorporation of these design features, combined with compliance with regulatory standards, would ensure that the Project would not conflict with energy and conservation measures provided by the state or City, and as such, impacts would be less than significant.

Cumulative Impacts

There are three (3) related projects identified by the City within 0.5 miles of the Project (see **Table 4.21-1**). The geographic context for the cumulative impacts analysis regarding electricity is LADWP's service area and the geographic context for the cumulative impacts analysis regarding natural gas is the SoCal Gas service area. The City has determined to assess the Project's potential cumulative impacts in the context of County-wide consumption. Growth within these geographic areas is anticipated to increase the demand for energy, as well as the need for energy infrastructure, such as new or expanded energy facilities.

As described above, the Project would comply with existing energy standards, would be consistent with adopted energy conservation plans, and would not result in wasteful, inefficient, and unnecessary consumption of energy resources during construction or operation. Therefore, the Project's contribution to cumulative impacts related to energy consumption would not result in

²⁸ City of Los Angeles, L.A.'s Green New Deal Sustainable City pLAN 2019.

a cumulatively considerable effect related to the wasteful, inefficient, and unnecessary consumption of energy during construction or operation. Therefore, cumulative impacts related to energy would be less than significant.

4.7 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 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>
d. Be located on expansive soil, as defined in Table 181B 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 wastewater disposal systems where sewers are not available for the disposal of wastewater?	<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 information and analysis presented below is largely based on the following sources (refer to Appendices D and E):

D Cultural Resources Assessment, BCR Consulting, September 14, 2025

E-1 Geotechnical Engineering Investigation, Norcal Engineering, June 30, 2025

Impact Analysis

- 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?**

No Impact. According to the *Geotechnical Engineering Investigation* prepared for the Project (refer to Appendix E), the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone and does not show evidence of an active fault at the site. Thus, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. Therefore, no impacts related to this issue would occur as a result of the Project.

- ii. **Strong seismic ground shaking?**

Less Than Significant Impact. The Project Site is located in the seismically active Southern California region, which generally experiences moderate to strong ground shaking in the event of an earthquake on a local or regional fault. However, as noted above, no active faults are known to pass directly beneath the Project Site and therefore, the Project would not exacerbate existing environmental conditions such that people or structures would be exposed to strong seismic ground shaking.

Additionally, state and local code requirements ensure that buildings are designed and constructed in a manner that, although the buildings may sustain damage during a major earthquake, would reduce the substantial risk that buildings would collapse. Specifically, the Project would comply with the Los Angeles Building Code, which incorporates current seismic design provisions of the California Building Code with City amendments. The California Building Code incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake and maximize earthquake safety.

LADBS is responsible for implementing the provisions of the Los Angeles Building Code, and the Project would be required to comply with the plan review and permitting requirements of LADBS, including the recommendations provided in a final, site-specific geotechnical report subject to review and approval by LADBS. The *Geotechnical Engineering Investigation* includes recommendations that would be enforced by the LADBS for the construction of the Project.

Thus, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. Therefore, Project impacts related to this issue would be less than significant.

iii. Seismic-related ground failure, including liquefaction?

No Impact. Liquefaction occurs when loose, relatively cohesionless soils lose their strength due to excess water pressure that builds up during repeated movement from seismic activity. Liquefaction usually results in horizontal and vertical movements from lateral spreading of liquefied materials and post-earthquake settlement of liquefied materials. Factors that contribute to the potential for liquefaction include a low relative density of granular materials, a shallow groundwater table, and a long duration and high acceleration of seismic shaking. The effects of liquefaction include the loss of the soil's ability to support footings and foundations which may cause buildings and foundations to buckle.

According to the *Geotechnical Engineering Investigation* prepared for the Project (refer to Appendix E), the Project Site is not situated within an area of historic occurrence of liquefaction, or local geological geotechnical and groundwater conditions to indicate a potential for permanent ground displacement. Thus, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction.

iv. Landslides?

No Impact. The Project Site and surrounding area are flat and not susceptible to landslides. Thus, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including landslides.

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

Less Than Significant Impact. During the Project's construction phase, soil would be exposed. However, the Applicant would be required to implement SCAQMD Rule 403 – Fugitive Dust to minimize wind and water-borne erosion at the site. Also, the Applicant would be required to prepare and implement a Stormwater Pollution Prevention Plan (SWPPP), in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities. The site-specific SWPPP would be prepared prior to any ground-disturbing activities and would be implemented during Project construction. The SWPPP would include best management practices (BMPs) and erosion control measures to prevent pollution in storm water discharge. Typical BMPs that could be used during construction include good-housekeeping practices (e.g., street sweeping, proper waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, proper handling and storage of hazardous materials, etc.) and erosion/sediment control measures (e.g., silt fences, fiber rolls, gravel bags, storm water inlet protection, and soil stabilization measures, etc.). The SWPPP would be subject to review and approval by the City for compliance with the City's Development Best Management Practices Handbook, Part A, Construction Activities. Additionally, all Project construction activities would comply with the City's grading permit regulations, which require the implementation of grading and dust control measures, including a wet weather erosion control plan if ground-disturbing activities occur during a rainy season, as well as inspections to ensure that sedimentation and erosion is minimized. Through compliance with these existing regulations, the Project would not result in any significant impacts related to soil erosion during ground-disturbing activities.

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

c) Would the project 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?

No Impact. As discussed in response to Checklist Question VII(a)(iii) (Geology and Soils – Liquefaction), the Project Site is not situated within an area of historic occurrence of liquefaction, or local geological geotechnical and groundwater conditions to indicate a potential for permanent ground displacement. The *Geotechnical Engineering Investigation* prepared for the Project (refer to Appendix E) did not identify any issues related to lateral spreading, subsidence, or collapse. Thus, the Project would not 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. Therefore, no impacts related to this issue would occur as a result of the Project.

d) Would the project be located on expansive soil, as defined in Table 181B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Less Than Significant Impact. Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. Due to high clay content, expansive soils expand with the addition of water and shrink when dried, which can cause damage to overlying structures. According to the *Geotechnical Engineering Investigation* prepared for the Project (refer to Appendix E), the on-site soils are moderate in expansion potential and would be accounted for as part of the Project design and construction. Furthermore, construction of the Project would be required to comply with the current California Building Code and supplemental requirements of the LAMC, as enforced by the City through the building permit process. These requirements would include building foundation and other requirements appropriate to site-specific conditions that would be provided in accordance with the design-level Geotechnical Investigation required by the City. Thus, the Project would not create substantial direct or indirect risks to life or property with regard to expansive soil. Therefore, Project impacts related to this issue would be less than significant.

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

No Impact. The Project Site is served by existing wastewater infrastructure, and the Project's wastewater demand would be accommodated by connections to the existing wastewater infrastructure. As such, the Project would not require the use of septic tanks or alternative wastewater disposal systems. Therefore, no impacts related to this issue would occur as a result of the Project.

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

Less than Significant Impact. There are no other distinct and prominent geologic or topographic features (i.e., hilltops, ridges, canyons, ravines, rock outcrops, water bodies, streambeds, or wetlands) on the Project Site. Thus, the Project would not destroy any distinct and prominent geologic or topographic features. Therefore, no impact would occur.

Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms, since the majority of species that have existed on earth from this era are extinct. Public Resources Code Section 5097.5 specifies that any unauthorized removal of paleontological remains is a misdemeanor. Furthermore, California Penal Code Section 622.5 includes penalties for damage or removal of paleontological resources.

The Project Site is located within an urbanized area and has been subject to repeated grading and development in the past. Thus, surficial paleontological resources that may have existed at one time have likely been previously disturbed. It is unlikely that very shallow excavations in the deposits underlying the Project Site are to uncover significant vertebrate deposits. The geologic units underlying the Project Site area are mapped as alluvial deposits dating from the Holocene. Holocene alluvial units are typically too young to preserve fossil resources. Based on this information, the Project Site has low potential for buried fossils. According to the *Cultural Resources Report* prepared for the Project (refer to Appendix D), no additional paleontological resource work or monitoring is recommended. However, if inadvertent fossil discoveries occur during project activities, a qualified paleontologist should be retained to recommend treatment.

Thus, the Project would not destroy a unique paleontological resource or site or unique geologic feature. Therefore, Project impacts related to this issue would be less than significant.

Cumulative Impacts

There are three (3) related projects identified by the City within 0.5 miles of the Project (see **Table 4.21-1**). Due to the site-specific nature of geological conditions (i.e., soils, geological features, subsurface features, seismic features, etc.), impacts associated with geology and soils are generally evaluated within the context of each individual project rather than on a cumulative basis. Nonetheless, cumulative growth in the surrounding area (inclusive of the Project and the related projects) would expose a greater number of people to seismic hazards. However, as with the Project, related projects and other future development projects would be required to comply with existing regulatory requirements and the City's grading permit review and approval process, as well as site-specific geotechnical evaluations that would identify potential effects related to the underlying geologic and soil conditions for a particular Related Project site. In addition, in the event that paleontological resources are uncovered, each Related Project would be required to comply with the applicable regulatory requirements, and the City's standard Condition of Approval regarding inadvertent discovery of paleontological resources would apply. Therefore, cumulative impacts related to geology and soils (would be less than significant).

4.8 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"/>

The information and analysis presented below are partially based on the following source (refer to Appendix C):

C-1 Air Quality, Energy, and Greenhouse Gas Impact Analysis, EPD Solutions, December 16, 2025.

C-2 Detailed Greenhouse Gas Emissions Regulatory Background.

Regulatory Background

Global climate change is driven in large part by increased atmospheric greenhouse gas (GHG) concentrations from human activities (e.g., fossil fuel combustion, industrial processes, land use change), which intensify the natural “greenhouse effect” and contribute to higher global average temperatures and related climatic and ecological consequences. The primary GHG is carbon dioxide (CO₂), though other gases (e.g., methane [CH₄], nitrous oxide [N₂O], hydrofluorocarbons [HFCs], perfluorocarbons [PFCs], sulfur hexafluoride [SF₆], and nitrogen trifluoride [NF₃]) can have much higher global warming potentials and are commonly expressed as carbon dioxide equivalents (CO₂e). Climate change is expected to affect California through a range of pathways, including increased temperatures, changes in precipitation and snowpack, heightened wildfire risk, air quality degradation (including more ozone and smoke-related impacts), water supply uncertainty, sea level rise and coastal flooding/erosion, and disruptions to ecosystems, wildlife, and agricultural productivity. The regulatory framework addressing GHG emissions includes federal actions under the Clean Air Act (including USEPA endangerment findings and vehicle/fuel economy programs), and an extensive set of California policies and statutes (e.g., Executive Orders establishing statewide reduction targets and carbon neutrality goals; AB 32 and SB 32; SB 97 CEQA GHG guidance; SB 743’s shift to VMT; SB 375’s regional SCS framework; and CARB’s Scoping Plan updates), as well as regional and local planning efforts (e.g., SCAG’s RTP/SCS investments and VMT/GHG reduction goals, SCAQMD policy direction, and City of Los Angeles measures such as CALGreen implementation, all-electric building requirements, and transportation assessment guidelines). A more detailed discussion of the environmental setting

and regulatory framework is provided in Appendix C.

Threshold of Significance

Methodology

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

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

The analysis below includes an estimation of the amount of GHG emissions that would be attributable to the Project using recommended air quality models to satisfy CEQA Guidelines Section 15064.4(a), which calls for a good-faith effort to describe and calculate emissions. The estimated emissions inventory is also used to determine if there would be a reduction in the Project's incremental contribution of GHG emissions as a result of compliance with regulations and requirements adopted to implement plans for the reduction or mitigation of GHG emissions. However, the significance of the Project's GHG emissions impacts is not based on the amount of GHG emissions resulting from the Project.

Consistency with Applicable Plans and Policies

The Project's GHG emissions impacts are evaluated by assessing the Project's consistency with applicable statewide, regional, and local GHG strategies. As discussed previously, the Project will be evaluated for consistency with AB 32's 2022 Climate Change Scoping Plan, SCAG's 2020-2045 RTP/SCS, and the Green New Deal.

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

Plan as recommended in the relevant amendments to the CEQA Guidelines. However, the City has the Green New Deal and Green Building Code that encourage and require applicable projects to implement energy efficiency measures. The Green New Deal is a mayoral initiative and not an adopted plan. However, it includes short-term and long-term aspirations pertaining to climate change and this analysis addresses consistency with these strategies and goals. Thus, if the Project is designed in accordance with these policies and regulations, the Project would result in a less than significant impact, because it would be consistent with the overarching State regulations on GHG reduction (AB 32, SB 32, AB 100, AB 1493, and SB 375). A consistency analysis is provided below that describes the Project's consistency with the applicable parts of CARB's Climate Change Scoping Plan, SCAG's 2020-2045 RTP/SCS, and the Green New Deal.

Impact Analysis

- a) **Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**
- b) **Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?**

Less Than Significant Impact. The threshold questions listed immediately above are addressed together. As discussed previously, the City has not adopted a numerical threshold for assessing impacts related to GHG emissions, and the City relies on a project's consistency with applicable plans, policies, and regulations adopted for the purpose of reducing GHG emissions to determine a project's impact related to GHG emissions. The analysis here includes an estimation of the Project's GHG emissions to satisfy CEQA Guidelines Section 15064.4(a), which calls for a good-faith effort to describe and calculate emissions. As discussed below, the Project would not generate GHG emissions that may have a significant impact on the environment and that the Project would not conflict with any applicable plans, policies or regulations adopted for the purpose of reducing the emissions of GHG emissions. Therefore, Project impacts related to GHG emissions would be less than significant.

Project GHG Emissions

The Project's construction GHG emissions are shown in **Table 4.8-1**, and the overall construction and operational emissions are shown in **Table 4.8-2**. These emissions were calculated using the CalEEMod model. The construction emissions are amortized over 30 years and added to the operational GHG emissions. As shown in **Table 4.8-2**, the Project's construction and gross operation GHG emissions would total 863 MTCO_{2e} per year. Accounting for existing site emissions, the Project would have net annual emissions of 602 MTCO_{2e}.

**Table 4.8-1
Estimated Project Construction GHG Emissions**

Construction Year	Annual GHG Emissions (MTCO_{2e})
Year 1 (2027)	458
Year 2 (2028)	158
Total	616
Total Amortized Over 30 Years	21

Source: EPD Solutions, 2025. Refer to **Appendix C-1**.

**Table 4.8-2
Estimated Project Operational GHG Emissions**

Activity	Annual GHG Emissions (MTCO_{2e})
Mobile	240
Area	4
Energy	405
Water	142
Waste	51
Refrigeration	<0.1
<i>Gross Project Operational Emissions</i>	<i>842</i>
<i>Project Construction Emissions</i>	<i>21</i>
Total	863
(Less Existing Emissions)	(261)
Net Total	602

Source: EPD Solutions, 2025. Refer to **Appendix C-1**.

Project Consistency with Plans, Policies, and Regulations

CARB 2022 Scoping Plan

Following Executive Order S-3-05, Executive Order B-55-189 was signed in 2018 in order to achieve carbon neutrality by 2045. This order mandated that the California 2017 Climate Scoping Plan was the guiding document which outlines actions for the State to achieve such GHG reduction goals. In 2020, CARB released a report titled “Achieving Carbon Neutrality in California”¹⁰ which evaluated various scenarios needed to meet at least an 80 percent reduction in GHG levels from 1990 by 2045. This report was then used by CARB to inform the development of the 2022 Scoping Plan for Achieving Carbon Neutrality¹¹ (2022 Scoping Plan), an update to the 2017 Climate Scoping Plan. Broad goals discussed in the Achieving Carbon Neutrality in California report were incorporated into the 2022 Scoping Plan. CARB’s 2022 Scoping Plan sets California’s GHG emission reduction target for 2045 at 85 percent below 1990 levels, which was codified by SB 32. As shown below in **Table 4.8-3**, 2022 Scoping Plan Consistency Summary, the Project would comply with all applicable plans and programs intended to reduce GHG emissions. Thus, the Project would be consistent with the 2022 Scoping Plan.

**Table 4.8-3
Project Consistency with the 2022 Scoping Plan**

Action	Consistency Discussion
GHG Emissions Reductions Relative to the SB 32 Target	
40% Below 1990 levels by 2030.	Consistent. The Project would comply with Title 24 Part 6 building energy requirements along with other local and State initiatives that aim to achieve GHG levels 40% percent below 1990 by 2030.
Smart Growth/Vehicle Miles Traveled (VMT)	
VMT per capita reduced 25% below 2019 levels by 2030, and 30% below 2019 levels by 2045.	Consistent. As previously discussed in Section 3 (Air Quality), the Project would be consistent with the growth assumptions in the 2024 Connect SoCal, so the Project would not interfere with the analysis completed for the Connect SoCal report outlining VMT reduction targets and measures.
New Residential and Commercial Buildings	
All electric appliances beginning 2026 (residential) and 2029 (commercial), contributing to 6 million heat pumps installed statewide by 2030.	Consistent. The Project would comply with Title 24 Parts 6 and 11, which includes electric heat pumps installed during construction and electric hookups for all appliances.
Construction Equipment	
25% of energy demand electrified by 2030 and 75% electrified by 2045.	No Conflict. The Project would be required to use construction equipment that is registered by CARB and meet CARB's standards. CARB sets its standards to be in line with the goal of reducing energy demand by 25 percent in 2030 and 75 percent in 2045.
Local Action - VMT Reduction	
Adopt and implement Complete Streets policies and investments, consistent with general plan circulation element requirements.	No Conflict. The Project does not propose any street improvements and would not interfere with the implementation of Complete Streets in the City.
Increase public access to shared clean mobility options (such as planning for and investing in electric shuttles, bike share, car share, transit).	Consistent. The Project Site is located in a developed urban area with sidewalks available along all nearby roadways. The proposed on-site roadway system includes walkways throughout the Project Site that would connect to the off-site sidewalks. The nearest bus stop from the existing Project driveway is the La Brea/San Vicente stop, located approximately 0.1 miles west. In addition, there are six other bus stops within 0.5 miles of the Project Site.
Local Action - Building Decarbonization	
Adopt all-electric new construction reach codes.	No Conflict. The Project would comply with Title 24 Parts 6 and 11, which include electric heat pumps installed during construction and electric hookups for all appliances.
Adopt policies and incentive programs to reduce electrical loads from equipment plugged into outlets (such as purchasing	No Conflict. The Project would be constructed in accordance with Title 24 CALGreen requirements, which include

**Table 4.8-3
Project Consistency with the 2022 Scoping Plan**

Action	Consistency Discussion
Energy Star equipment for municipal buildings, occupancy sensors, smart power strips, equipment controllers, etc.).	installation of Energy Star equipment and appliances in new buildings.
Facilitate deployment of renewable energy production and distribution and energy storage.	No Conflict. The Project would be constructed in accordance with the California Energy Code (Title 24 Part 6) to meet all requirements related to solar energy production and the CALGreen Building Energy Efficiency Standards (Title 24 Part 11) to meet efficiency standards. In addition, the Project would be built to be solar ready.
<i>Source: 2022 Scoping Plan.</i>	

SCAG Connect SoCal 2024

On April 4, 2024, SCAG’s Regional Council adopted Connect SoCal 2024, the 2024-2050 RTP/SCS, which includes long-range regional transportation plans, regional transportation improvement programs, regional housing needs allocations, and other plans for the region. SCAG’s Connect SoCal 2024 policies focus largely on regional transportation and the efficiency of transportation, which are implemented by counties and cities within the SCAG region, as part of the overall planning and maintenance of the regional transportation system. However, these strategies are also intended to reduce GHG emissions from passenger vehicles. As an individual development, the policies are not directly applicable to the Project since the Project does not propose any changes to regional transportation systems or roadways. However, the Project would not interfere with the implementation of these policies, since the Project would be consistent with the growth assumptions outlined in the Connect SoCal 2020 and 2024. In addition, the Project proposes to redevelop a site that is currently within the vicinity of several bus stops within a 0.5-mile radius. While a majority of SCAG’s Implementation Strategies are related to transportation, the Project would be consistent with the Sustainable Development measures, which focus on a reduction of resource consumption, through compliance with energy efficacy measures from Title 24 standards. Therefore, the Project would be consistent with the Connect SoCal 2024 plan.

Los Angeles’s Green New Deal

The City released L.A.’s Green New Deal in 2019, a guidance document containing targets and measures to reduce GHG emissions within the City to 50 percent below 1990 levels by 2025; 73 percent below 1990 levels by 2035; and becoming carbon neutral by 2050. The City has 13 different sectors of focus, identified by the chapters of the plan, to reduce GHG emissions. The chapter targets and initiatives for each chapter are primarily intended for the City as an organization to implement. However, development of the Project would not inhibit the City’s ability to meet these GHG reduction goals. The Project’s consistency with the plan is discussed in **Table 4.8-4**. As noted, the Project would be consistent with the City’s Green New Deal.

**Table 4.8-4
Project Consistency with the Green New Deal**

Action	Consistency Discussion
Renewable Energy	
LADWP will supply 55% renewable energy by 2025; 80% by 2036; and 100% by 2045.	No Conflict. These measures are initiatives for the City and for Los Angeles Department of Water and Power to implement. However, on an individual development scale, the Project would be constructed to be solar ready and would not inhibit the installation of future solar energy generation.
Increase cumulative MW by 2025; 2035; and 2050 of: <ul style="list-style-type: none"> • Local solar to 900-1,500 MW; 1,500-1,800 MW; and 1,950 MW • Energy storage capacity to 1,654-1,750 MW; 3,000 MW; and 4,000 MW • Demand response (DR) programs to 234 MW (2025) and 600 MW (2035) 	
Local Water	
Reduce potable water use per capita by 22.5% by 2025; and 25% by 2035; and maintain or reduce 2035 per capita water use through 2050.	No Conflict. The Project would be required to meet water efficiency standards for the flow rates of water fixtures, as outlined in Title 24 CALGreen measures.
Clean and Healthy Buildings	
All new buildings will be net zero carbon by 2030; and 100% of buildings will be net zero carbon by 2050	No Conflict. The Project would be constructed in accordance with Title 24 CALGreen requirements, which includes installation of Energy Star equipment and appliances in new buildings. In addition, the Project would be built to be solar ready.
Reduce building energy use per sq. ft. for all building types 22% by 2035; 34% by 2035; and 44% by 2050.	
Mobility and Public Transit	
Reduce VMT per capita by at least 13% by 2025; 39% by 2035; and 45% by 2050.	No Conflict. The Project includes self-storage uses located in a commercial corridor characterized by a high degree of pedestrian activity. The Project would provide greater proximity to neighborhood services, jobs, and residences and would be well-served by existing public transportation. Therefore, the Project would support VMT reductions.
Industrial Emissions & Air Quality Monitoring	
Reduce industrial emissions by 38% by 2035; and 82% by 2050.	No Conflict. The Project would not exceed SCAQMD’s air quality and GHG emissions thresholds, as detailed above. SCAQMD’s regional maximum emission thresholds set standards to reduce the burden of SCAQMD to attain and maintain ambient air quality standards. Therefore, the Project would not result in a significant impact to air quality on both project levels and cumulative levels.
Source: City of Los Angeles. (2019). L.A.’s Green New Deal.	

Conclusion

As described above, the proposed Project's annual construction and gross operational GHG emissions would total 863 MTCO_{2e}. Net operational emissions would total 602 MTCO_{2e} per year. The Project is consistent with the actions and measures of CARB's 2022 Scoping Plan, SCAG Connect SoCal 2024, and the City's Green New Deal and would not interfere with the policies and goals set within those plans. Therefore, the Project's contribution to GHG emissions impacts would not be considerable.

Cumulative Impacts

The analysis of a project's GHG emissions is inherently a cumulative impacts analysis, because climate change is a global problem, and the emissions from any single project alone would be negligible. Accordingly, the analysis above considered the potential for the Project to contribute to a significant cumulative impact on global climate change.

4.9 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 type="checkbox"/>	<input checked="" 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 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"/>
g. 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"/>

The information and analysis presented below is largely based on the following sources (refer to Appendix F):

F-1 Phase I Environmental Site Assessment, Hazard Management Consulting, February 6, 2025

F-2 Phase I Environmental Site Assessment, Hazard Management Consulting, July 10, 2025

Impact Analysis

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

Less Than Significant Impact. The Project would not involve the routine (long-term) transport of hazardous materials to and from the Project Site during construction. During demolition, site

preparation, on-site grading, and building construction, hazardous materials such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners could be routinely used on the Project Site. While some hazardous materials used during construction could require disposal, such activity would occur only for the duration of construction and would cease upon completion of the Project.

In addition, all potentially hazardous materials to be used during construction of the Project would be used and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. Construction of the Project would also comply with all applicable federal, state, and local requirements concerning the use, storage, and management of hazardous materials. Consequently, Project construction activities would not create a significant hazard to the public or the environment through the use of hazardous materials during construction.

The Project involves the development of a new seven-story self-storage facility. The Project does not involve the routine use, transport, or disposal of hazardous materials during operation. The proposed use of the Project Site is a typical urban use that does not involve the routine use of hazardous materials. For example, the proposed use would involve the use and storage of small quantities of potentially hazardous materials such as cleaning solvents, paints, and pesticides for landscaping.

Likewise, the Project's commercial and associated office use could include commercial-grade cleaning solvents, waxes, dyes, toners, paints, bleach, grease, and petroleum products that are typically associated with commercial land uses. In other words, the Project generally would not produce significant amounts of hazardous waste, use or transport hazardous waste beyond those materials typically used in an urban development. Thus, none of the Project's operational features, or the type of hazardous materials used on the Project Site, creates a significant hazard to the environment or public.

Moreover, the Project would adhere to regulatory requirements for source hazardous waste reduction measures (e.g., recycling of used batteries, recycling of elemental mercury, etc.) that would further minimize the generation of hazardous waste. In addition, the Project will comply with the applicable City ordinances regarding implementation of hazardous waste reduction efforts on-site (i.e., the City's Green Building Ordinance). The applicable regulatory requirements further ensure that the minimal number of hazardous materials associated with the Project are properly treated and disposed of at licensed resource recovery facilities or hazardous waste landfills. Tenants may occasionally store household chemicals or small amounts of materials, but such use is strictly regulated by lease agreements and facility policies prohibiting the storage of flammable, corrosive, or hazardous substances.

Thus, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Therefore, Project impacts related to this issue would be less than significant.

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

Less Than Significant Impact. The Phase I ESA included historical site utilization research and a site reconnaissance to identify potential on-site hazards. The current and past land uses within the Project Site were identified as part of the Phase I ESA to assess their potential to present concerns relative to the presence of hazards within the Project Site. These are described below:

- Recognized Environmental Condition (REC) is defined by the current ASTM Standard E1527 as the (1) the presence of hazardous substances or petroleum products in, on, or at the subject property due to a release to the environment; (2) the likely presence of hazardous substances or petroleum products in, on, or at the subject property due to a release or likely release to the environment; or (3) the presence of hazardous substances or petroleum products in, on, or at the subject property under conditions that pose a material threat of a future release to the environment.
- Controlled Recognized Environmental Condition (CREC) is defined by the current ASTM Standard E1527 as a recognized environmental condition affecting the subject property that has been addressed to the satisfaction of the applicable regulatory authority or authorities with hazardous substances or petroleum products allowed to remain in place subject to implementation of required controls (for example, activity and use limitations or other property use limitations).
- Historical Recognized Environmental Condition (HREC) is defined by the current ASTM Standard E1527 as a previous release of hazardous substances or petroleum products affecting the subject property that has been addressed to the satisfaction of the applicable regulatory authority or authorities and meeting unrestricted use criteria established by the applicable regulatory authority or authorities without subjecting the subject property to any controls (for example, activity and use limitations or other property use limitations).
- Other Environmental Considerations (OEC) warrant discussion, but do not qualify as RECs as defined by the current ASTM Standard E1527. These include, but are not limited to, de minimis conditions and/or environmental considerations such as the presence of ACMs, LBP, radon, mold, and lead in drinking water, which can affect the liabilities and financial obligations of the client, the health and safety of site occupants, and the value and marketability of the subject property. A de minimis condition is defined by the ASTM Standard as a condition that generally does not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.

The Phase I ESA for the Project Site provides the following conclusions and recommendations:

Conclusions

- REC – Former gas station facility in 1929.
- REC – Former clothing manufacturing facility in the 1950s through 1970s.

- REC – The site’s location in the Los Angeles Methane Zone. Potential for the presence of elevated methane and hydrogen sulfide in the subsurface.
- Non-Scope items included observations of suspect asbestos containing materials.

Recommendations:

- Conduct a Phase II ESA for both soil and soil vapor analysis including methane. If the site is planned for redevelopment, the City will require a methane survey as well. If there are plans for redevelopment, the soil gas survey component of the Phase II can be designed to satisfy the Los Angeles Department of Building and Safety level methane survey protocols.
- Conduct an asbestos survey prior to demolition or any other activity that may disturb suspect materials.

Based on the conclusions and recommendations of the Phase I ESA, a Phase II ESA was prepared and made the following conclusions and recommendations:

Conclusions:

- Soil analytical results indicated that total petroleum hydrocarbons (TPH), volatile organic compounds (VOCs), and metals were below regulatory commercial /industrial (C/I) screening criteria. Overall results do not identify the presence of a significant release of hazardous chemicals.
- Soil vapor analytical results for VOCs were generally below regulatory C/I screening criteria, except for sparse and relatively low magnitude concentrations of 1,3-butadiene, benzene, and chloroform. Overall VOC results do not appear indicative of a significant release at the site or migration of impacts from off-site sources.
- Results of the screening-level methane survey indicated that concentrations were detected at elevated levels exceeding the lower explosive limit (LEL), upper explosive limit (UEL), and likely require installation of a LADBS Level V mitigation system.

Recommendations:

- No further investigation for soil or VOCs in soil vapor.
- If the property is to be redeveloped, perform methane site testing following LADBS standards, including conducting a Shallow Soil Gas Test and Gas Probe Test by a LADBS-certified methane testing technician.
- If the property is to remain in its current configuration, a subslab depressurization system be installed to mitigate migration of methane inside of the building where it could pose an explosive risk.
- Conduct an asbestos survey prior to any demolition or disturbance of suspect ACM.

Before any demolition or renovation work in the City, a Certified Asbestos Consultant (CAC) must conduct a survey to determine whether asbestos-containing materials (ACM) are present. If ACM is found, the CAC must prepare a cleanup plan, and removal must be performed by a licensed asbestos abatement contractor in accordance with SCAQMD Rule 1403, which governs surveys, notifications, work practices, containment, and disposal. Rule 1403 requires electronic notification to SCAQMD prior to removal, and the LAMC further requires a Fire Department permit for removal of 100 square feet or more of ACM (or its equivalent in linear feet), except in certain small residential buildings. Abatement work must follow strict containment protocols, including sealed work areas, negative air pressure, and HEPA filtration, to prevent the release of asbestos fibers into the environment.

Additionally, as mentioned above, the Project Site is located within a designated Methane Zone. The City regulates building and paving in Methane Zones and Methane Buffer Zones through Division 71, “Methane Seepage Regulations,” of the LAMC, which sets minimum requirements for controlling methane intrusion into buildings and confined spaces. These regulations apply to all new buildings and paved areas within a Methane Zone or Methane Buffer Zone and require compliance with the City’s Methane Mitigation Standards as a condition of building permit issuance.

Under LAMC Sections 91.7103 and 91.7104.2, all buildings in a Methane Zone or Methane Buffer Zone must be evaluated for methane hazard and provided with an appropriate methane mitigation system, as specified in Table 71 based on the site’s methane “design level.” In practice, LADBS requires a methane soil-gas investigation by qualified professionals to determine the site-specific design level and then requires installation of a mitigation system (often including a sub-slab barrier, passive or active venting, and methane detection/ventilation equipment) consistent with the applicable design level. The Fire Department and LADBS jointly enforce requirements for gas-detection and ventilation systems, and ongoing testing, maintenance, and emergency procedures are also mandated under Division 71 to ensure continued protection of occupants over the life of the building.

For the Project, compliance with these existing methane regulations would be required as part of the standard building permit process. The Project would undergo LADBS review to confirm its location in a Methane Zone, completion of a methane investigation, and incorporation of a methane mitigation system meeting or exceeding the City’s Methane Mitigation Standards and any Project-specific requirements imposed by LADBS and the Fire Department. With these regulatory requirements in place, mandating design, installation, and ongoing operation of methane barriers, venting systems, and detection/ventilation equipment, the potential for hazardous accumulation of methane gas within the building or on the site would be effectively controlled.

Based on all of the information presented above, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Therefore, Project impacts related to this issue would be less than significant.

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

No Impact. There are no schools within 0.25 miles of the Project Site. The Holy Spirit STEM Academy located approximately 0.8 miles west of the site is the school closest to the Project site. Thus, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Therefore, no impacts related to this issue would occur as a result of the Project.

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

No Impact. Section 65962.5 of the California Government Code requires the California Environmental Protection Agency (CalEPA) to develop and update annually the Cortese List, which is a “list” of hazardous waste sites and other contaminated sites. While Section 65962.5 references to the preparation of a “list,” many changes have occurred related to web-based information access since 1992 and information regarding the Cortese List is now compiled on the websites of multiple agencies including the Department of Toxic Substances Control (DTSC), the State Water Resources Control Board (SWRCB), and CalEPA. A review of Envirostor shows that the Project Site is not listed.²⁹ Thus, the Project would not 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. Therefore, no impacts related to this issue would occur as a result of the Project.

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

No Impact. The Project Site is not located within the vicinity of a private airstrip or an airport land use plan. The nearest airport is Los Angeles International Airport (LAX) located 7.15 miles southwest of the site. Thus, the Project would not expose people residing or working in the project area to excessive airport-related noise levels. Therefore, no impacts related to this issue would occur as a result of the Project.

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

Less Than Significant Impact. The Project Site is located on the south side of San Vicente Boulevard between Longwood Avenue and Tremaine Avenue in the Wilshire Community Plan Area. The surrounding street network consists of an established urban grid with wide arterial roadways, including San Vicente Boulevard, which serves as a designated disaster route within the City of Los Angeles. The Project would demolish the existing warehouse building and surface

²⁹ DTSC, Envirostor, https://www.envirostor.dtsc.ca.gov/public/map/?global_id=60000842&zl=12, accessed November 13, 2025.

parking lots on the Project Site and construct a new seven-story self-storage facility with 161,645 square feet of floor area, along with five (5) parking spaces and two (2) loading spaces.

Construction activities would be confined to the boundaries of the Project Site and would occur in accordance with standard City requirements for temporary traffic control, including compliance with the Los Angeles Department of Transportation (LADOT) Traffic Control Manual and the Work Area Traffic Control Handbook (WATCH). Any temporary lane closures, if needed, would be subject to LADOT permit conditions requiring maintenance of emergency vehicle access at all times. Construction would not require full closure of San Vicente Boulevard, Longwood Avenue, or Tremaine Avenue, and would not interfere with emergency access along these streets.

During operation, the Project would not alter the existing street network, modify traffic circulation patterns, or introduce land uses that generate substantial vehicle traffic or blocking of circulation routes. A self-storage facility typically generates low traffic volumes and infrequent loading activity, and the proposed driveways and loading areas would be fully contained on site. Emergency access would continue to be provided from both Longwood Avenue and Tremaine Avenue, and the Project would be required to comply with all Fire Department access, fire-lane, and building clearance requirements as part of the building permit process. These design requirements ensure that adequate emergency ingress and egress are maintained.

The City does not have a stand-alone adopted emergency evacuation plan for individual neighborhoods. Instead, emergency response is guided by the City's Emergency Operations Plan (EOP) and related functional annexes. The EOP focuses on citywide coordination and does not designate project-specific evacuation routes that would be affected by development at the Project Site. The Project does not propose street closures, changes to roadway classifications, or modifications to disaster route functionality.

Thus, the Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, Project impacts related to this issue would be less than significant.

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

No Impact. The Project Site is not located in a Very High Fire Hazard Severity Zone.³⁰ Thus, the Project would not expose people or structures, directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Therefore, no impacts related to this issue would occur as a result of the Project.

Cumulative Impacts

There are three (3) related projects identified by the City within 0.5 miles of the Project (see **Table 4.21-1**). The geographic extent of the Project's environmental impacts is limited to the Project Site and would not contribute to any other potential environmental impact that may occur beyond the boundaries of the Project Site. The related project identified would be subject to discretionary or

³⁰ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for 4828 San Vicente Boulevard, <https://zimas.lacity.org/>, accessed August 4, 2025.

ministerial review by the City, which would be responsible for assessing potential hazards risks associated with the related project, and if necessary, the applicant of that project would be required to implement measures appropriate for the type and extent of hazardous materials present and the land use proposed to reduce the risk associated with the hazardous materials to an acceptable level. As stated previously, the Project would not result in any significant impacts related to hazards and hazardous materials. Therefore, no significant cumulative impacts related to hazards and hazardous materials would occur.

4.10 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 substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

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

Less Than Significant Impact. The Project Site is smaller than one acre and as a result, is not subject to the Statewide Construction General Permit (Order 2009-0009-DWQ, as amended), which requires preparation of a Storm Water Pollution Prevention Plan (SWPPP) for projects that disturb one acre or more of soil. However, construction and operation of the Project must comply with local stormwater regulations administered through the City and the Los Angeles Regional Water Quality Control Board (RWQCB), which ensure that pollutants are minimized and water quality is protected even for smaller development sites.

During construction, the Project would be required to comply with the City's Low Impact Development (LID) Ordinance and Standard Urban Stormwater Mitigation Plan (SUSMP) requirements, which apply to most development projects regardless of acreage. The Project would implement appropriate best management practices (BMPs) such as erosion-control measures, sediment barriers, proper handling and storage of construction materials, and good-housekeeping practices. These measures would prevent pollutants—including sediment, trash, construction debris, and chemicals, from leaving the Site and entering the storm drain system. Compliance with LID/SUSMP ensures that stormwater runoff is treated or infiltrated on site to the maximum extent feasible.

Stormwater runoff generated during operation of the Project has the potential to introduce small amounts of pollutants typically associated with commercial developments (e.g., household cleaners, landscaping pesticides, and vehicle petroleum products) into the stormwater system. Stormwater runoff from precipitation events could carry urban pollutants into municipal storm drains, however during operation the Project would be required to comply with the City's LID Ordinance. The LID Ordinance applies to all development and redevelopment in the City that requires a building permit. LID Plans are required to include a site design approach and BMPs that address runoff and pollution at the source. Further, to comply with LID Ordinance the Project would be required to capture and treat the first 3/4-inch of rainfall in accordance with established stormwater treatment priorities. Compliance with the LID Ordinance would reduce the amount of surface water runoff leaving the Project Site as compared to the current conditions. Compliance with the LID Plan and SUSMP, including the implementation of BMPs, would ensure that operation of the Project would not violate water quality standard and discharge requirements or otherwise substantially degrade water quality.

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

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

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

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

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

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

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

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

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

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

- iv. **Impede or redirect flood flows?**

Less Than Significant Impact. The Project Site is located within a FEMA-designated 100-year flood zone (Zone AO) and 500-year flood zone, which correspond to a 1-percent and 0.2-percent annual chance of flooding, respectively. The Project Site, however, is fully developed with a single-story warehouse building and associated surface parking lots, and contains no natural drainages, streams, rivers, or other hydrologic features that could be altered or redirected. Existing stormwater runoff sheet-flows across paved surfaces toward existing storm drain inlets in the surrounding street network.

Implementation of the Project would remove the existing warehouse building and pavement and construct a new seven-story self-storage facility with associated hardscape. While the Project would introduce new impervious surfaces, the site is already predominantly impervious under existing conditions; therefore, the Project would not substantially increase imperviousness or materially change the timing or quantity of stormwater runoff compared to existing conditions. In accordance with the LAMC, the LID Ordinance, and the City's Stormwater and Urban Runoff Pollution Control requirements, the Project would be required to implement on-site stormwater management features designed to retain or treat runoff and prevent increased flows from leaving the site. Compliance with these requirements ensures that post-construction runoff volumes and rates do not exceed existing conditions.

Because the Project does not include any modification to the course of a stream or river, and because on-site stormwater flows would continue to drain to the existing municipal storm drain system in a manner consistent with existing conditions, the Project would not impede, divert, or redirect flood flows within the FEMA-designated flood zones. Furthermore, the new building would be required to comply with all applicable flood-hazard development standards, including finished-floor elevation requirements, flood-proofing, and LADBS review for construction within a Zone AO or 500-year flood zone. These requirements ensure that the Project is designed to withstand potential flood events without altering flood behavior on or off the site.

Thus, the Project would not substantially alter drainage patterns or impede or redirect flood flows. Therefore, Project impacts related to this issue would be less than significant.

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

Less Than Significant Impact. As discussed above, the Project is located in a Zone AO or 500-year flood zone. The new building would be required to comply with all applicable flood-hazard development standards, including finished-floor elevation requirements, flood-proofing, and LADBS review for construction within a Zone AO or 500-year flood zone. Additionally, as a self-storage facility, the Project would not contain any pollutants that would necessarily result in water quality issues in the event of flooding. The Project Site is not located near any large bodies of open water, the closest being the Pacific Ocean located approximately nine miles west of the site. Thus, the Project would not risk release of pollutants due to project inundation. Therefore, Project impacts related to this issue would be less than significant.

e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

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

Stormwater runoff generated during operation of the Project has the potential to introduce small amounts of pollutants typically associated with mixed-use developments (e.g., household cleaners, landscaping pesticides, and vehicle petroleum products) into the stormwater system. Stormwater runoff from precipitation events could carry urban pollutants into municipal storm drains, however during operation the Project would be required to comply with the City's LID Ordinance. The Stormwater LID Ordinance applies to all development and redevelopment in the City that requires a building permit. LID Plans are required to include a site design approach and BMPs that address runoff and pollution at the source. Further, to comply with LID Ordinance the Project would be required to capture and treat the first 3/4-inch of rainfall in accordance with established stormwater treatment priorities. Compliance with the LID Ordinance would reduce the amount of surface water runoff leaving the Project Site as compared to the current conditions. Compliance with the LID Plan and Standard Urban Stormwater Mitigation Plan (SUSMP), including the implementation of BMPs, would ensure that operation of the Project would not violate water quality standard and discharge requirements or otherwise substantially degrade water quality.

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

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

Cumulative Impacts

Less Than Significant Impact.

There are three (3) related projects identified by the City within 0.5 miles of the Project (see **Table 4.21-1**). The sites of the Project and the related project are located in an urbanized area where most of the surrounding properties are already developed. The existing storm drainage system serving this area has been designed to accommodate runoff from an urban built-out environment. When new construction occurs, it generally does not lead to substantial additional runoff, since new developments are required to control the amount and quality of stormwater runoff coming from their respective sites. Additionally, all new development in the City is required to comply with the City's LID requirements and incorporate appropriate stormwater pollution control measures into the design plans to ensure that water quality impacts are minimized. Therefore, cumulative impacts related to hydrology and water quality would be less than significant.

4.11 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"/>

Impact Analysis

a) **Would the project physically divide an established community?**

No Impact. The Project would not cause any permanent street closures, block access to any surrounding land use, or cause any change in the existing street grid system. The Project is not of a scale or nature that would physically divide an established community. The Project is not affecting any rights-of-way. The Project will be built on an existing urban infill site and is contiguous and bounded by streets. In addition, the site is not large enough to encompass an established community. The Project would be constructed within the boundaries of the Project Site, and the proposed uses would be located within the building. These uses would be consistent with other developments located adjacent to and in the general vicinity of the Project Site. All proposed development would also occur within the boundaries of the Project Site. In addition, the Project does not propose a freeway or other large infrastructure that could divide the existing surrounding community. Thus, the Project would not physically divide an established community. Therefore, no impacts related to this issue would occur as a result of the Project.

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

Less Than Significant Impact. The determination of consistency with applicable land use policies and ordinances is based upon a review of the previously identified planning and zoning documents that regulate land use or guide land use decisions pertaining to the Project Site.

A project is considered consistent with the provisions and general policies of applicable City or regional land use plan and regulation if it is consistent with the overall intent of the plan or regulation and would not preclude the attainment of its primary goals.³¹ More specifically, according to the ruling in *Sequoyah Hills Homeowners Association v. City of Oakland*, state law does not require an exact match between a project and the applicable general plan. Rather, to be

³¹ Sequoyah Hills Homeowners Association v. City of Oakland (1993) 23 Cal.App.4th.704, 719.

“consistent,” the project must be “compatible with the objectives, policies, general land uses, and programs specified in the applicable plan,” meaning that a project must be in “agreement or harmony” with the applicable land use plan to be consistent with that plan.

Various local and regional plans and regulatory documents guide development of the Project Site. The following discussion addresses the Project’s consistency with the requirements and policies of SCAG’s RTP/SCS, the City’s General Plan (including the Framework Element, the Housing Element, Conservation Element, and Mobility Plan 2035), the Community Plan, and the LAMC, to the extent that various goals, objectives, and policies of these plans have been adopted for the purpose of avoiding or mitigating an environmental effect. The Project’s consistency with certain other goals, objectives, and policies that do not directly relate to the avoidance or mitigation of environmental effects is also briefly discussed for informational purposes.

Southern California Association of Governments

Regional Transportation Plan/Sustainable Communities Strategy

SCAG’s 2024–2050 RTP/SCS, also known as Connect SoCal, was adopted on April 4, 2024. The 2024–2050 RTP/SCS presents a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals through the year 2050 for the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. The core vision of the 2024–2050 RTP/SCS is to build upon and expand land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. The 2024–2050 RTP/SCS builds upon this core vision with new initiatives at the intersection of land use, transportation, and technology to reach the region’s GHG reduction goals. These initiatives include policies, projects, and programs that strengthen and enhance each other beyond what each would accomplish in isolation. Strategies to advance the core vision address sustainable development, system preservation and resilience, demand and system management, transit backbone, complete streets, and goods movement. For each of these strategies, SoCal Connect provides information on progress made since the prior RTP/SCS.

The Project’s consistency with the 2024–2050 RTP/SCS is discussed under Checklist Section 8, Greenhouse Gas Emissions. As discussed there, the Project would be substantially consistent with the 2024-2050 RTP/SCS.

City of Los Angeles General Plan

Framework Element

The Framework Element, adopted in December 1996 and readopted in August 2001, sets forth general guidance regarding land use issues for the City and defines citywide policies regarding land use that influence the community plans and most of the City’s General Plan Elements. Specifically, the Framework Element defines citywide policies for land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation, and infrastructure and public services. The Project’s consistency with the applicable goals, objectives and policies of the General Plan Framework Element is provided in **Table 4.11-1** and summarized below.

**Table 4.11-1
Project Consistency with City of Los Angeles General Plan**

Goal, Objectives, Policies	Analysis of Project Consistency
Framework Element Land Use Chapter	
<p>3.2.2 Establish, through the Framework Long-Range Land Use Diagram, community plans, and other implementing tools, patterns and types of development that improve the integration of housing with commercial uses and the integration of public services and various densities of residential development within neighborhoods at appropriate locations.</p>	<p>Consistent. The Project includes development of self-storage facility building to serve the needs of the community.</p>
<p>3.2.3 Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.</p>	<p>Consistent. The Project is an infill development on a site that already served by existing roadways and nearby transit facilities. The Project includes development of a self-storage facility building to serve the needs of the community. The area is developed with a variety of commercial and residential uses in close proximity to the Project Site. Additionally, the Project includes long-term bicycle parking spaces and short-term parking spaces, which would encourage bicycle use.</p>
<p>3.4.1 Conserve existing stable residential neighborhoods and lower-intensity commercial districts and encourage the majority of new commercial and mixed-use (integrated commercial and residential) development to be located (a) in a network of neighborhood districts, community, regional, and downtown centers, (b) in proximity to rail and bus transit stations and corridors, and (c) along the City's major boulevards, referred to as districts, centers, and mixed-use boulevards, in accordance with the Framework Long-Range Land Use Diagram.</p>	<p>Consistent. The Project is an infill development on a site that already served by existing roadways and nearby transit facilities. The Project includes development of a self-storage facility building to serve the needs of the community. The area is developed with a variety of commercial and residential uses in close proximity to the Project Site. Additionally, the Project includes long-term bicycle parking spaces and short-term parking spaces, which would encourage bicycle use.</p>
Mobility Element	
<p>Policy 3.1: Recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes – including goods movement – as integral components of the City's transportation system.</p>	<p>Consistent. The Project would promote this policy by providing adequate vehicular access. The Project Site is also served by a variety of transit options provided by Metro.</p>
<p>Policy 3.2: Accommodate the needs of people with disabilities when modifying or installing infrastructure in the public right-of-way.</p>	<p>Consistent. The Project would be designed to provide accessibility and accommodate the needs of people with disabilities as required by the American with Disabilities Act (ADA) and the City's applicable related building code regulations.</p>
<p>Policy 3.3: Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs,</p>	<p>Consistent. The Project would promote equitable land use decisions that result in fewer vehicle trips by providing a new self-storage development in close</p>

**Table 4.11-1
Project Consistency with City of Los Angeles General Plan**

Goal, Objectives, Policies	Analysis of Project Consistency
destinations, and other neighborhood services.	proximity to transit. The Project is located in an area with ample transit within walking distance.
Policy 3.4: Provide all residents, workers and visitors with affordable, efficient, convenient, and attractive transit services.	Consistent. The Project would promote equitable land use decisions that result in fewer vehicle trips by providing a new self-storage development in close proximity to transit. The Project is located in an area with ample transit within walking distance.
Policy 3.8: Provide bicyclists with convenient, secure and well-maintained bicycle parking facilities.	Consistent. The Project would provide secure bicycle parking and bicycle accessibility mobility for employees and visitors to the Project Site. The Project would also provide 36 bicycle parking spaces (18 short-term and 18 long-term) in accordance with LAMC requirements.
Policy 3.9: Discourage the vacation of public rights-of-way	Consistent. The Project would not vacate any public rights-of-way, and all associated public rights-of-way would be maintained as part of the Project.
Policy 3.10: Discourage the use of cul-de-sacs that do not provide access for active transportation options.	Consistent. The Project would not include the development of a cul-de-sac.
Policy 4.8 Encourage greater utilization of Transportation Demand Management (TDM) strategies to reduce dependence on single-occupancy vehicles.	Consistent. The LADOT's requirement for a transportation assessment is if a development is estimated to generate a net increase of 250 or more daily vehicle trips and requires discretionary action. Based on the land use and size of the existing and proposed uses, the trip generation determined that the Project would generate a net increase of 205 trips. Therefore, based on the City threshold to trigger further traffic analysis of 250 new daily vehicle trips, the Project is presumed to have a less-than-significant impact related to VMT.
Policy 5.2 Support ways to reduce vehicle miles traveled (VMT) per capita.	Consistent. The Project would include self-storage uses located in a commercial corridor characterized by a high degree of pedestrian activity. The Project would provide greater proximity to neighborhood services, jobs, and residences and would be well-served by existing public transportation. Therefore, the Project would support VMT reductions.
Policy 5.4 Continue to encourage the adoption of low and zero emission fuel sources, new mobility technologies, and supporting infrastructure.	Consistent. This policy applies to large-scale goals relative to fuel sources, technologies and infrastructure. The Project would also comply with the City's EV charging requirements.
Policy 5.5 Maximize opportunities to capture and infiltrate stormwater within the City's public rights-of-way.	Consistent. The Project would comply with the City's LID Ordinance. A capture and use system of approximately 2,510 cubic feet is proposed for the site, per LID requirements. ³²

³² Peak Flow Hydrologic Analysis, DRC Engineering, August 2025.

**Table 4.11-1
Project Consistency with City of Los Angeles General Plan**

Goal, Objectives, Policies	Analysis of Project Consistency
Conservation Element	
<p>15.1 Objective: Protect and reinforce natural and scenic vistas as irreplaceable resources and for the aesthetic enjoyment of present and future generations.</p>	<p>Consistent. The Project Site and surrounding area are characterized by dense urban development. Due to existing buildings in the area, views are generally obstructed, and no scenic vistas exist. Therefore, the Project would not have any adverse effect on a scenic vista for the enjoyment of present and future generations.</p>
<p>15.1 Policy: Continue to encourage and/or require property owners to develop their properties in a manner that will, to the greatest extent practical, retain significant existing land forms (e.g., ridge lines, bluffs, unique geologic features) and unique scenic features (historic, ocean, mountains, unique natural features) and/or make possible public view or other access to unique features or scenic views.</p>	<p>Consistent. The Project Site does not contain any significant existing landforms (e.g., ridge lines, bluffs, unique geologic features) or unique scenic features (historic, ocean, mountains, unique natural features). The Project Site is located in an urbanized portion of the City and topographically relatively flat. The Project Site is not a part of a scenic resource and would not obstruct any scenic views.</p>
Infrastructure and Public Services Chapter	
<p>Objective 9.10: Ensure that water supply, storage, and delivery systems are adequate to support planned development.</p>	<p>Consistent. Based on LADWP demand projections provided in its 2020 Urban Water Management Plan, LADWP would be able to meet the water demand of the Project, as well as the existing and planned future water demands of its service area for development that is consistent with the General Plan and other growth plans.</p> <p>As the Project's water demand is accounted for in the City's future projected demands (the 2020-2045 RTP/SCS includes growth throughout the Los Angeles subregion and informs the LADWP 2020 UWMP), the Project would not require the construction or expansion of new water treatment facilities that could cause a significant environmental effect.</p> <p>In general, projects that conform to SCAG's 2020-2045 RTP/SCS demographic projections and are in the City's service area are considered to have been included in LADWP's water supply planning efforts in the UWMP. The Project is consistent with the General Plan designation and Community Plan and zoning. In terms of the City's overall water supply condition, the water requirement for any project that is consistent with the City's General Plan has been taken into account in the planned growth of the water system. Furthermore, the Project would not exceed the available capacity within the distribution infrastructure that would serve the Project Site.</p>

**Table 4.11-1
Project Consistency with City of Los Angeles General Plan**

Goal, Objectives, Policies	Analysis of Project Consistency
<p>Goal 9P: Appropriate lighting required to: (1) provide for nighttime vision, visibility, and safety needs on streets, sidewalks, parking lots, transportation, recreation, security, ornamental, and other outdoor locations; (2) provide appropriate and desirable regulation of architectural and information lighting such as building façade lighting or advertising lighting; and (3) protect and preserve the nighttime environment, views, driver visibility, and otherwise minimize or prevent light pollution, light trespass, and glare.</p>	<p>Consistent. The Project would introduce new sources of artificial light to the Project Site, including low-level exterior lights for security and way-finding purposes, as well as general accent lighting. The Project would not include electronic lighting or signs with flashing or strobe lights. All exterior lighting would be shielded or directed toward the areas to be lit to limit spill-over onto off-site uses. The Project would comply with the City’s lighting and signage ordinances and would have signage approved by LADBS.</p>
<p>General Plan, Chapter 3-Land Use: https://planning.lacity.org/cwd/framwk/chapters/03/03205.htm City of Los Angeles, Conservation Element of the General Plan, March 2001. Housing Element: http://planning.lacity.org/HousingInitiatives/HousingElement/Text/Ch6.pdf City of Los Angeles, Health and Wellness Element of the General Plan, March 2015. General Plan, http://cityplanning.lacity.org/cwd/framwk/fwhome0.htm Note: This table includes only the policies that are applicable to the Project.</p>	

Land Use Chapter

The Framework Element Land Use Chapter identifies districts, centers, and mixed-use boulevards, which are described in terms of ranges of intensity/density, heights, and lists of typical uses. Additionally, the Project would support and would be consistent with the Land Use Chapter as it would contribute to the City’s goal for a physically balanced distribution of land uses that facilitates conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, and assurance of environmental justice and a healthful living environment.

In particular, the Project would promote a more balanced distribution of land uses with the replacement of an underutilized site with a new self-storage building. These proposed uses would be developed in an area well served by public transit provided by Metro and the City of Glendale.

Furthermore, the Project would provide secure bicycle parking and EV charging infrastructure on-site. In addition, development of the Project in an area with convenient access to public transit and opportunities for walking and biking would promote an improved quality of life by facilitating a reduction of vehicle trips, VMT, and air pollution. Therefore, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Framework Element’s Land Use Chapter adopted for the purpose of avoiding or mitigating an environmental effect.

Urban Form and Neighborhood Design Chapter

The Urban Form and Neighborhood Design Chapter of the Framework Element establishes a goal of creating a livable City for existing and future residents. This chapter defines “urban form” as the City’s general pattern of building height, development intensity, activity centers, focal

elements, and structural elements, such as natural features, transportation corridors, open space, and public facilities. “Neighborhood design” is defined as the physical character of neighborhoods and communities.

The Framework Element does not directly address the design of individual neighborhoods or communities but embodies general neighborhood design and implementation programs that guide local planning efforts and lay a foundation for updating the community plans. The Urban Form and Neighborhood Design Chapter encourages growth in areas that have a sufficient base of both commercial and residential development to support transit service.

The Project’s consistency with the relevant objectives and policies that support the goals of the Urban Form and Neighborhood Design Chapter of the Framework Element is discussed under Checklist Section 1, Aesthetics, of this MND (**Table 4.1-1**). As concluded therein, the Project would be generally consistent with the applicable objectives and policies that support the goals set forth in the Framework Element’s Urban Form and Neighborhood Design Chapter.

Open Space and Conservation Chapter

The Open Space and Conservation Chapter of the Framework Element contains goals, objectives, and policies to guide the provision, management, and conservation of public open space resources, address the outdoor recreational needs of the City’s residents, and guide amendments to the General Plan Open Space Element and Conservation Element. This chapter also includes policies to resolve the City’s open space issues. Specifically, this chapter contains open spaces goals, objectives, and policies regarding resource conservation and management, outdoor recreation, public safety, community stability, and resources development.

The Project’s consistency with the Framework Element’s Open Space and Conservation Chapter is discussed in **Table 4.11-1**. As described therein, the Project would be consistent with the relevant objectives and policies that support the goals of the Open Space and Conservation Chapter of the Framework Element.

Furthermore, the Project would not conflict with or encroach upon the public and private open space system. Therefore, the Project would be generally consistent with the applicable objectives and policies that support the goals set forth in the Framework Element’s Open Space and Conservation Chapter that seek to avoid or mitigate an environmental effect.

Infrastructure and Public Service Chapter

The Infrastructure and Public Services Chapter of the Framework Element addresses infrastructure and public service systems, including wastewater, stormwater, water supply, solid waste, police, fire, libraries, parks, power, schools, telecommunications, street lighting, and urban forest and two traffic signals at the project driveways. For each of the public services and infrastructure systems, basic policies call for monitoring service demands and forecasting the future need for improvements, maintaining an adequate system/service to support the needs of population and employment growth, and implementing techniques that reduce demands on utility infrastructure or services. Generally, these techniques encompass a variety of conservation programs (e.g., reduced use of natural resources, increased site permeability, watershed

management, and others). Attention is also placed on the establishment of procedures for the maintenance and/or restoration of service after emergencies, including earthquakes.

The Project's consistency with the Framework Element's Infrastructure and Public Services Chapter is discussed in **Table 4.11-1**. As described therein, the Project would comply with the City's grading permit regulations, which require the preparation of an erosion control plan. The Project would also be required to comply with the City's LID Ordinance, which would require the implementation of BMPs to collect, detain, and treat runoff on-site. As discussed under Checklist Section 19, Utilities and Service Systems, of this MND, LADWP would be able to meet the water demand for the Project as well as existing and planned water demands of its future service area. Furthermore, the Project would not exceed the available capacity within the water distribution infrastructure that would serve the Project Site, and no system upgrades would be required as a result of the Project. Thus, the Project would be generally consistent with the applicable objectives and policies that support the goals set forth in the Framework Element's Infrastructure and Public Services Chapter that seek to avoid or mitigate an environmental effect.

Conservation Element

The Conservation Element primarily addresses the preservation, conservation, protection, and enhancement of the City's natural resources, including agricultural lands, archaeological and paleontological resources, endangered species, habitat areas, and mineral resources. The Conservation Element also recognizes the City's responsibility for identifying and protecting its cultural and historical heritage. As previously described, the Project Site is developed and paved and does not contain any natural resources other than ornamental planted grass. As discussed throughout this MND, the Project would have no significant impact on agricultural lands, endangered species, habitat areas, or mineral resource areas. In addition, as discussed under Checklist Section 4, Biological Resources, above, the trees and landscaping within the Project Site are not subject to the City's Protected Tree and Shrub Ordinance.

With respect to historic resources, as discussed under Checklist Section 5, Cultural Resources, of this MND, none of the potential historical resources in the vicinity of the Project Site would be directly or indirectly affected by the Project as they are physically separated from the Project Site and the primary public views and general character of these resources would remain unchanged by the Project. The Project would also implement standard measures to ensure that potential impacts to archaeological, paleontological, and tribal cultural resources would remain less than significant.

Furthermore, as analyzed under Checklist Section 1, Aesthetics, of this MND, the Project would not obstruct or remove access to natural and scenic vistas. Thus, the Project would not conflict with Section 15 of the Conservation Element, which encourages protection of scenic vistas and the preservation of public views of visual resources. Overall, as outlined above, the Project would not conflict with the Conservation Element.

Housing Element

The 2021–2029 Housing Element (Housing Element), which was adopted on November 24, 2021, and subsequently amended by the City Council on June 14, 2022, identifies the City's housing conditions and needs; establishes the goals, objectives, and policies that are the foundation of

the City’s housing and growth strategy; and provides the array of programs the City intends to implement to create sustainable, mixed-income neighborhoods across the City. The goals of the Housing Element are as follows:

- Goal 1: A City where housing production results in an ample supply of housing to create more equitable and affordable options that meet existing and projected needs;
- Goal 2: A City that preserves and enhances the quality of housing and provides greater housing stability for households at all income levels;
- Goal 3: A City in which housing creates healthy, livable, sustainable, and resilient communities that improve the lives of all Angelenos;
- Goal 4: A City that fosters racially and socially inclusive neighborhoods and corrects the harms of historic racial, ethnic, and social discrimination of the past and present; and
- Goal 5: A City that is committed to preventing and ending homelessness.

There is no existing housing on the site. The Project is not a housing development.

Transportation Element/Mobility Plan 2035

The Mobility Plan, adopted on January 20, 2016 and readopted September 7, 2016, is a comprehensive update of the General Plan Transportation Element. Accordingly, the goals of the Transportation Chapter of the Framework Element are now implemented through the Mobility Plan. The overarching goal of the Mobility Plan is to achieve a transportation system that balances the needs of all road users. The Mobility Plan incorporates “complete streets” principles. In 2008, the California State Legislature adopted Assembly Bill (AB) 1358, The Complete Streets Act, which requires local jurisdictions to “plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways, defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation, in a manner that is suitable to the rural, suburban or urban context.” The Mobility Plan includes the following five main goals that define the City’s high-level mobility priorities:

- Safety First;
- World Class Infrastructure;
- Access for All Angelenos;
- Collaboration, Communication, and Informed Choices; and
- Clean Environments and Healthy Communities.

Each of the goals contains objectives and policies to support the achievement of those goals. The Project would be consistent with the relevant objectives and policies that support the goals of the Mobility Plan, as detailed in **Table 4.11-1**.

The Project would improve pedestrian accessibility within and around the Project Site by providing new landscaping, walkways, and sidewalks that meet their designated width. The access points on Allesandro Street would require new curb cuts to accommodate ingress and egress maneuvers, thereby reducing the total vehicle conflict points with pedestrians. Each driveway would be designed to provide safe access for pedestrians. Also, the Project's proximity to a variety of public transit options would provide residents, workers, and visitors convenient access to transit services. Therefore, the Project would be generally consistent with the applicable policies that support the goals and objectives set forth in the Mobility Plan.

Wilshire Community Plan

The Wilshire Community Plan (Community Plan) is one of 34 Community Plans established for different areas of the City to implement the policies of the General Plan Framework Element. There are four main areas designated as Community Commercial Centers in the Wilshire Community Plan. These include: the Crenshaw Community Center; the Pico Community Center; the Beverly-Fairfax Community Center, and the Vermont Community Center. The Pico Community Center is approximately 34 acres in size. It is centered around Pico, San Vicente and Venice Boulevards in the south-central portion of the Plan Area and is generally bounded by Pico Boulevard on the north; Venice Boulevard on the south; West Boulevard on the east; and Mansfield Avenue on the west. The Community Center includes a supermarket and shopping area, and the Santa Monica-Metro Bus Customer Service Center Station. The area has been developed with commercial land uses ranging from one- and two-story retail to high-rise office buildings and large shopping centers. The entire length of Pico Boulevard is designated as a Mixed Use Boulevard.

The Project would preserve and enhance the positive characteristics of existing residential and commercial neighborhoods while providing a new self-storage use that will improve the function, design and economic vitality of the adjacent commercial corridors. The Project will also advance a number of other objectives, goals and policies of the Community Plan, as evidenced by the consistency analysis in **Table 4.11-2**. As set forth therein, the Project would be consistent with the applicable goals, objectives, and policies set forth in the Community Plan.

Los Angeles Zoning Code

The City of Los Angeles Zoning Code (Chapter 1 of the LAMC) regulates development through zoning designations and development standards. The LAMC establishes objective zoning and development standards but was not adopted to avoid or mitigate environmental impacts. Therefore, no consistency analysis is required for purposes of determining potential impacts under this threshold. However, a brief discussion of the Project's consistency with the LAMC requirements for the Project Site is provided below for informational purposes.

**Table 4.11-2
Project Consistency with the Wilshire Community Plan**

Goals, Objectives, Policies	Analysis of Project Consistency
<p>Goal 2 Encourage strong and competitive commercial sectors which promote economic vitality and serve the needs of the Wilshire community through well-designed, safe and accessible areas, while preserving historic and cultural character.</p>	<p>Consistent. The Project supports this goal by enhancing the utility and productivity of an underutilized, commercially zoned site through a use that is consistent with existing land use designations and zoning regulations. The development will not displace existing neighborhood-serving businesses and will not compromise historic or cultural resources. The project's design will meet applicable safety and accessibility standards, contributing to a well-maintained and functional commercial environment.</p>
<p>Objective 2-1 Preserve and strengthen viable commercial development and provide additional opportunities for new commercial development and services within existing commercial areas.</p>	<p>Consistent. The Project maintains and enhances viable commercial land by improving an existing site located within a designated commercial corridor. It does not propose a conversion to residential use or remove commercial capacity, and therefore directly supports the preservation and reinvestment in the community's commercial base</p>
<p>Policy 2-1.1 New commercial uses should be located in existing established commercial areas or shopping centers.</p>	<p>Consistent. The Project is sited within an established commercial corridor (San Vicente Boulevard) and is surrounded by a mix of commercial, public, and institutional uses. As such, the project fully aligns with this policy by reinforcing the role of an existing commercial area.</p>
<p>Policy 2-1.2 Protect existing and planned commercially zoned areas, especially in Regional Commercial Centers, from encroachment by stand-alone residential development by adhering to the community plan land use designations.</p>	<p>Consistent. The Project does not introduce stand-alone residential uses and adheres to the site's existing commercial zoning and land use designation. Therefore, it protects and reinforces the planned commercial function of the area, in accordance with the Wilshire Community Plan.</p>
<p>Policy 2-1.3 Enhance the viability of existing neighborhood stores and businesses which support the needs of local residents and are compatible with the neighborhood.</p>	<p>Consistent. While not a retail use, the Project is compatible with surrounding land uses and does not displace or conflict with neighborhood-serving businesses. Its redevelopment may improve foot traffic and visibility along the corridor, indirectly supporting nearby commercial activity and enhancing area vitality.</p>
<p>Wilshire Community Plan: https://planning.lacity.gov/odocument/3333424a-21b9-4f7b-86db-064926b9dcb9/Wilshire_Community_Plan.pdf</p>	

The site is zoned C2-1-O (Commercial Zone, Height District 1, Oil Drilling Overlay) and Community Commercial land use designation. As discussed in Section 3, Project Description, of this MND, the proposed self-storage commercial uses would be consistent with the types of uses surrounding the Project Site. The City requires a Class 2 Conditional Use Permit (CU2) for a self-storage building for household goods within 500 feet or less from an A or R Zone or residential use. In addition to the requested CUP to permit the proposed storage uses within 500 feet of a R zone, the Applicant also requests a Zone and Height District Change to permit additional floor area up to a maximum Floor Area Ratio of 6:1 in lieu of 1.5:1 permitted in Height District 2 of the

C2 Zone. As discussed in Table 4.11-2, the Project would be consistent with the goals and policies of the Wilshire Community Plan. With the approval of the requests, the Project would not conflict with the LAMC. The Project further complies with landscaping, trash, and loading areas standards as required by the Zoning Code. Lighting for the project will be shielded and oriented on-site.

Overall, based on the above, the Project would not conflict with the RTP/SCS, LAMC, Community Plan, or the City of Los Angeles General Plan. Therefore, the Project would not 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, and impacts would be less than significant.

Cumulative Impacts

There are three (3) related projects identified by the City within 0.5 miles of the Project (see **Table 4.21-1**). As discussed previously, the Project would be substantially consistent with the applicable plans, policies, or regulations associated with development of the Project Site. The City assesses the consistency of all development in the City with all applicable plans, policies, and regulations associated with those projects, on a project-by-project basis. Regardless of any potential inconsistencies the related projects may result in, because the Project would not result in any inconsistencies, the Project would not have the potential to contribute to any cumulative inconsistency impacts.

4.12 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"/>

Impact Analysis

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

No Impact. The Project Site is not located within a City-designated Mineral Resource Zone (MRZ) or Surface Mining District where significant mineral deposits are known to be present or within a mineral producing area as classified by the California Geologic Survey.^{33,34,35} Much of the area within the MRZ sites in Los Angeles was developed with structures prior to the MRZ classification and, therefore, are unavailable for extraction.³⁶ The site is not within an MRZ. Neither the Project site nor the surrounding area is identified as an area containing mineral deposits of regional or statewide significance. Thus, the Project would not result in the loss of availability of a known mineral resource. Therefore, no impacts related this issue would occur as a result of the Project.

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

No Impact. As stated above, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site. The Project Site is not located within a City-designated MRZ or Surface Mining District where significant mineral deposits are known to be present or within a mineral producing area as classified by the California Geologic Survey. Therefore, no impacts related to this issue would occur as a result of the Project.

33 City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995. Figure GS-1.

34 State of California Department of Conservation, California Geologic Survey, Aggregate Sustainability in California, 2018.

35 City of Los Angeles, Conservation Element of the Los Angeles City General Plan, January 2001, Exhibit A, p. 86.

36 City of Los Angeles Department of City Planning, Conservation Element, adopted September 2001, page II-58.

Cumulative Impacts

There are three (3) related projects identified by the City within 0.5 miles of the Project (see **Table 4.21-1**). As discussed previously, the Project would not result in any impacts related to mineral resources. Regardless of what degree the related projects could result in impacts related to mineral resources, because the Project would not result in any impacts related to mineral resources, the Project would not have the potential to contribute to any cumulative impacts.

4.13 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 type="checkbox"/>	<input checked="" 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 information and analysis presented below is largely based on the following source (refer to Appendix G):

G Noise and Vibration Impact Report, LSA, October 2025.

Impact Analysis

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

Less Than Significant Impact. As discussed in detail below, the Project would not generate noise levels in excess of applicable thresholds, and Project impacts related to this issue would be less than significant.

Regulatory Setting

The applicable regulatory setting is summarized below. These regulations establish the framework for evaluating potential noise impacts associated with the Project and include applicable federal, state, and local standards governing environmental noise levels. For a detailed presentation and comprehensive discussion of the applicable regulatory setting, the reader is referred to the *Noise and Vibration Impact Report* prepared for the Project, included in Appendix G of this document.

City of Los Angeles Noise Element of the General Plan

In California, cities and counties are required to adopt noise elements as part of their general plans. The purpose of a noise element is to establish a land use pattern that minimizes the exposure of residents of the community to excessive noise. The Noise Element of the City's General Plan provides planning guidance related to noise. It identifies goals, objectives, and an implementation program to ensure that Los Angeles residents will be protected from noise that may be detrimental to their physical and mental health and general welfare. In the noise element, the City has established an acceptable limit of noise exposure for various land use categories. The purpose of these criteria is to provide a guideline for the City to locate appropriate land uses within acceptable noise environments. Table C included on page 11 of the *Noise and Vibration Impact Report* in Appendix G shows the City's land use compatibility standards for noise. Noise levels of 50 and 55 dBA CNEL are identified as being "normally acceptable" for single-family and multifamily residential land uses, respectively. Noise levels of 65 dBA CNEL are identified as being "normally acceptable" for office uses.

LAMC

Chapter XI of the LAMC establishes noise standards to limit noise affecting various land uses in the city. These standards apply to noise generated by "any machinery equipment, pump, fan, air-conditioning apparatus, or similar mechanical device." Table D included on page 11 of the *Noise and Vibration Impact Report* in Appendix G summarizes the presumed ambient noise levels for various land use types as specified in LAMC Section 111.03.

Where the ambient noise level is less than the presumed ambient noise level designated, the presumed ambient noise level shall be deemed to be the minimum ambient noise level. At the boundary line between two zones, the presumed ambient noise level of the quieter zone shall be used. In accordance with the Noise Regulation, a noise level increase of 5 dBA over the existing average ambient noise level at an adjacent property line represents a noise violation.

Thresholds of Significance

Construction Noise

- For construction activities that occur between 7:00 a.m. and 7:00 p.m. Monday through Friday, and between 8:00 a.m. and 6:00 p.m. on Saturdays, there is no numerical threshold above ambient noise levels.
- On- and off-site construction noise during daytime hours (7:00 a.m. and 7:00 p.m. Monday through Friday, and 8:00 a.m. to 6:00 p.m. on Saturdays) are limited to a maximum 80 dBA Leq (8-hour) absolute threshold at sensitive uses (at the property line or at the exterior of the building), including outdoor public recreational areas owned or maintained by a public agency. This standard does not apply to private residential balconies which may or may not extend past the exterior of a building, or to private residential recreational areas.

Mat concrete pour activities (and other types of concrete pour, which require an extended continuous pour beyond the allowable construction house) that are required to occur during nighttime hours for less than five days are exempt from this threshold.

Operational Noise

A project could have a significant noise impact if the following occurs:

- The Project causes the ambient noise levels measured at the property line of affected noise-sensitive uses to increase by 3 dBA in CNEL to or within the “normally unacceptable” or “clearly unacceptable” category (refer to Table C included on page 11 of the *Noise and Vibration Impact Report* in Appendix G); or
- The Project causes the ambient noise levels measured at the property line of affected noise-sensitive uses to increase by 5 dBA in CNEL or greater and remain within the “normally acceptable” or “conditionally acceptable” category; or
- Project-related on-site operational (noise sources, such as outdoor building mechanical/electrical equipment, loading dock, parking facilities, increase the ambient noise level (hourly Leq) at noise-sensitive uses by 5 dBA or more.

Impact Analysis

Construction Noise

Two main types of short-term construction noise would occur. The first is traffic-related noise from worker commutes and material deliveries. Although individual heavy trucks can generate loud, momentary noise (up to 84 dBA L_{max} at 50 feet), the added construction traffic, equivalent to about 442 adjusted trips per day, would increase noise along San Vicente Boulevard by only about 0.1 dBA, which is far below the 3 dBA threshold of perceptibility. Therefore, traffic-related construction noise would be less than significant. A brief nighttime concrete pour would occur but would last fewer than five days and is exempt.

The second type of noise comes from on-site construction activities such as demolition, grading, building construction, trenching, and paving. Each construction phase uses different equipment and as a result, generates different noise levels. Using Federal Highway Administration reference noise levels and equipment usage factors, hourly and composite noise levels were calculated. Typical equipment produces 55 to 95 dBA L_{max} at 50 feet, depending on type. Composite noise levels for the Project would range from 76 to 90 dBA Leq at 50 feet, with the loudest phases occurring during paving and building construction. Noise levels decrease by about 6 dBA for every doubling of distance. Sensitive receptors and phase-specific noise levels were then estimated based on these calculations (refer to **Table 4.13-1**).

**Table 4.13-1
Estimated Construction Noise Levels at Nearest Receptors**

Receptor (Location)	Composite Noise Level (dBA Leq at 50 ft)	Distance (ft)	Composite Noise Level (dBA Leq)
Commercial (South)	90	65	87
Residential (North)	90	215	77
Commercial (East)	90	220	77
Commercial (West)	90	250	76
ft = feet			
Source: LSA, 2025. Refer to Appendix G .			

While construction noise would vary, it is expected that composite noise levels during construction would reach 87 dBA Leq at the nearest commercial uses to the south and 77 dBA Leq at the nearest residential uses to the north during daytime hours. These predicted noise levels would only occur when all construction equipment is operating simultaneously and are assumed to be rather conservative in nature. While construction-related short-term noise levels have the potential to be higher than existing ambient noise levels in the Project Site area under existing conditions, the noise impacts would no longer occur once Project construction is completed.

As stated above, the City’s Noise Ordinance regulates noise impacts associated with construction activities. The proposed project would comply with the construction hours specified in the City’s Noise Ordinance, which states that construction activities are not allowed between the hours of 9:00 p.m. and 7:00 a.m. on any given day. The LAMC also prohibits noise from construction equipment within 500 ft of a residential zone before 8 a.m. or after 6 p.m. on any Saturday or national holiday nor at any time on any Sunday.

As it relates to off-site uses, construction-related noise levels would remain below the 80 dBA construction noise level criteria for daytime construction noise level criteria as established by the City for residential uses. Therefore, the Project’s construction-related noise impacts would be less than significant.

Operational Noise

As a result of the implementation of the Project, off-site traffic volumes on surrounding roadways have the potential to increase. The Project is estimated to generate approximately 194 net daily trips.³⁷ According to the LADOT Traffic Counts Summary, the existing average daily traffic (ADT) on San Vicente Boulevard is approximately 26,266 ADT in the vicinity of the Project Site. The results of the calculations show that an increase of approximately 0.1 dBA CNEL is expected along San Vicente Boulevard. A noise level increase of less than 1 dBA would not be perceptible to the human ear. Therefore, the Project’s traffic noise impact would be less than significant.

The Project would have various rooftop mechanical equipment, including HVAC units on the proposed self-storage building. Based on the Project Site plan, the Project is assumed to have three (3) rooftop HVAC units and assumed to operate 24 hours per day. The HVAC equipment would generate sound power levels (Lw) of up to 87 dBA Lw or a sound pressure level of 72 dBA

³⁷ Level of Service (LOS) Screening Analysis, EPD Solutions, September 16, 2025. Refer to Appendix H.

Leq at 5 feet, based on manufacturer data. This level is used as a reference level and is not indicative of the level at surrounding receptors.

Tables 4.13-2 and **4.13-3** show the hourly noise levels generated by HVAC equipment at the closest offsite land uses. The results indicate that operational noise levels would be below the daytime hourly noise level standard of 50 dBA Leq for residential uses. Additionally, operational noise levels would be below the lowest nighttime ambient noise level at the nearest residential uses to the north. Therefore, the Project's operational noise impacts related to HVAC equipment would be less than significant.

Table 4.13-2
Estimated Daytime and Nighttime Exterior Noise Levels

Receptor	Direction	Existing Lowest Daytime/Nighttime Noise Levels (dBA Leq)	Project Generated Noise Levels (dBA Leq)	Significant Impact?
Residential	North	67.1/54.8	45.3	No
Source: LSA, 2025. Refer to Appendix G .				

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

Less Than Significant Impact. As discussed below, the Project would not generate excessive groundborne vibration or groundborne noise levels. Therefore, Project impacts related to this issue would be less than significant.

Thresholds of Significance

- For construction activities that occur between 7:00 a.m. and 7:00 p.m. Monday through Friday, and between 8:00 a.m. and 6:00 p.m. on Saturdays, there is no numerical threshold related to human annoyance.
- During nighttime hours (between 7:00 p.m. and 7:00 a.m. Monday through Friday, and between 6:00 p.m. and 8:00 a.m. on Saturdays), and anytime on Sundays or national holidays, construction activities shall not generate groundborne vibration levels that exceed 80 VdB at the exterior of a sensitive use building.
- Architectural Building Damage—Construction activities shall not exceed the following building damage thresholds for the identified structures:
 - Fragile Buildings: 0.1 peak particle velocity (PPV) (inches/second [in/sec])
 - Historic Buildings: 0.25 PPV (in/sec)
 - Older Residential Structures: 0.3 PPV (in/sec)
 - New Residential Structures: 0.5 PPV (in/sec)
 - Modern Industrial/Commercial Buildings: 0.5 PPV (in/sec)

For vibration building damage, a threshold of 0.5 PPV (in/sec) has been used as the criterion.

Impact Analysis

Construction Vibration

This construction vibration impact analysis discusses the level of human annoyance using vibration levels in root-mean-square (RMS) vibration velocity decibels (VdB) and assesses the potential for building damages using vibration levels in PPV (in/sec). This is because vibration levels calculated in RMS are best for characterizing human response to building vibration, while vibration level in PPV is best for characterizing potential for damage.

Table 4.13-3 shows the PPV and VdB values at 25 feet from the construction vibration source. As shown, bulldozers, and other heavy-tracked construction equipment (expected to be used for this project) generate approximately 0.089 PPV in/sec or 87 VdB of ground-borne vibration when measured at 25 feet, based on the Federal Transportation Administration (FTA) Manual. The distance to the nearest buildings for vibration impact analysis is measured between the nearest off-site buildings and the Project construction boundary (assuming the construction equipment would be used at or near the project setback line).

**Table 4.13-3
Vibration Source Amplitudes for Construction Equipment**

Equipment	Reference PPV/L _v at 25 ft	
	PPV (in/sec)	L _v (VdB) ¹
Pile Driver (Impact), Typical	0.644	104
Pile Driver (Sonic), Typical	0.170	93
Vibratory Roller	0.210	94
Hoe Ram	0.089	87
Large Bulldozer²	0.089	87
Caisson Drilling	0.089	87
Loaded Trucks²	0.076	86
Jackhammer	0.035	79
Small Bulldozer	0.003	58

μin/sec = microinches per second ft = foot/feet FTA = Federal Transit Administration
 in/sec = inch/inches per second LV = velocity in decibels PPV = peak particle velocity
 RMS = root-mean-square VdB = vibration velocity decibels

¹ RMS vibration velocity in decibels (VdB) is 1 μin/sec.
² Equipment shown in bold is expected to be used on site.

Source: Transit Noise and Vibration Impact Assessment Manual (FTA 2018).

As shown in **Table 4.13-4**, the Project’s vibration levels are estimated to approach 76 VdB at the closest commercial uses to the south and 59 VdB at the nearest residential use to the north and would not exceed the annoyance threshold of 80 VdB. As shown in **Table 4.13-5**, vibration levels are estimated to approach 0.191 in/sec PPV at the nearest surrounding structures to the south and would not exceed the 0.5 PPV in/sec damage threshold considered safe for modern commercial buildings. Therefore, the Project’s vibration impacts would be less than significant.

**Table 4.13-4
Estimated Construction Vibration Annoyance Levels at Nearest Receptor**

Receptor (Location)	Reference Vibration Level (VdB) at 25 feet	Distance (Feet)	Vibration Level (VdB)
Commercial (South)	87	65	76
Residential (North)		215	59
Commercial (East)		220	59
Commercial (West)		250	57
VdB = vibration velocity decibels			
Source: Transit Noise and Vibration Impact Assessment Manual (FTA 2018).			

**Table 4.13-5
Estimated Construction Vibration Damage Levels at Nearest Receptor**

Receptor (Location)	Reference Vibration Level (PPV) at 25 feet	Distance (Feet)	Vibration Level (PPV)
Commercial (South)	0.089	15	0.191
Residential (North)		165	0.005
Commercial (East)		70	0.019
Commercial (West)		100	0.011
PPV = peak particle velocity			
Source: Transit Noise and Vibration Impact Assessment Manual (FTA 2018).			

Operational Vibration

During operation of the self-storage facility, there would be no significant stationary sources of groundborne vibration, such as heavy equipment or industrial operations. Operational groundborne vibration in the Project Site's vicinity would be generated by its related vehicle travel on local roadways. However, road vehicles rarely create vibration levels perceptible to humans unless road surfaces are poorly maintained and have potholes or bumps. As a result, the Project's long-term vibration impacts would not be significant.

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

No Impact. The Project Site is not located within the vicinity of a private airstrip or an airport land use plan. The nearest airport is Los Angeles International Airport (LAX) located 7.15 miles southwest of the site. Thus, the Project would not expose people residing or working in the project area to excessive airport-related noise levels. Therefore, no impacts related to this issue would occur as a result of the Project.

Cumulative Impacts

There are three (3) related projects identified by the City within 0.5 miles of the Project (see **Table 4.21-1**). None of the related projects are within 1,000 feet of the Project Site. Due to distance and intervening development, the related projects do not share a noise environment with the Project. Noise generated at the sites of the related projects would not be audible to the sensitive receptors near the Project Site. Therefore, cumulative noise impacts would be less than significant.

4.14 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 checked="" type="checkbox"/> | <input 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"/> |

Impact Analysis

- a) **Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?**

Less Than Significant Impact. The Project includes infill-development of the Project Site and redevelopment of the site with a 161,645-square-foot self-storage facility, which would employ approximately 11 people. The types of jobs that would be made available by the Project could be filled by the existing workforce in the Project Site area, and the Project would not cause a substantial number of new residents to move to the Project Site area and surrounding communities to fill the employment positions. Also, the Project does not include the development of housing and would be served by existing roadways and utility infrastructure. For these reasons, the Project would not induce substantial population growth, and impacts related to this issue would be less than significant.

- b) **Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?**

No Impact. The Project Site contains a single-story, 22,706-square-foot warehouse building. As no housing currently exists on the Project Site, the Project would not cause the displacement of any persons, housing, or require the construction of housing elsewhere. Therefore, no impacts related to displacement of people or housing would occur.

Cumulative Impacts

There are three (3) related projects identified by the City within 0.5 miles of the Project (see **Table 4.21-1**). The related projects are residential projects, while collectively introducing approximately 178 new housing units, represent infill development consistent with the Los Angeles General Plan and regional growth forecasts. The related projects are located within an urbanized area well-

served by infrastructure and public services, and do not require the extension of new infrastructure that could induce unplanned growth. New housing projects in Los Angeles help the City meet its housing goals and needs by increasing the total housing stock and directly addressing the region's long-standing quantitative housing shortage. Adding new residential units, both market-rate and affordable, also helps ensure that lower-income households have meaningful access to housing through the provision of affordable and mixed-income opportunities. In addition, locating new housing in infill areas and near transit supports sustainable, transit-oriented development patterns that reduce VMT and advance the City's climate and mobility goals. Importantly, new housing projects do not necessarily induce population growth beyond what is already projected in regional planning forecasts; rather, they help accommodate the population that already exists and is expected to grow under adopted demographic projections. By providing needed capacity for existing and anticipated residents, new housing development improves housing availability, reduces overcrowding, and supports the City's ability to meet its Housing Element and Regional Housing Needs Assessment (RHNA) obligations. As discussed above, the Project would not generate residential population or displace existing housing or residents. Additionally, the Project's employment could be filled by the existing workforce in the Project Ste area. Thus, would not contribute to population growth or housing demand. For all of these reasons, cumulative population and housing impacts would be less than significant.

4.15 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 checked="" type="checkbox"/>	<input 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"/>

Impact Analysis

a) Fire Protection?

Less Than Significant Impact. The Project Site is served by the Los Angeles Fire Department (LAFD), which provides fire suppression, emergency medical response, and life-safety services throughout the City. Fire Station #68 is the station closest to the Project Site (refer to Table 4.15-1) and is capable of responding to incidents at the site within the City’s established response standards.

The Project involves demolition of an existing single-story warehouse and construction of a new seven-story, approximately 161,645-square-foot self-storage facility with approximately 11 employees and low daily occupancy. Self-storage facilities typically generate substantially fewer emergency calls than residential, commercial office, or retail uses due to the low-intensity nature of the use and the absence of activities involving elevated fire risk.

**Table 4.15-1
Fire Stations**

No.	Address	Distance	Equipment	Operational Response Time	Incident Counts
68	5023 W. Washington Boulevard	0.9 miles	Engine Paramedic Ambulance Brush Control	EMS: 7:20 min Non-EMS: 7:20 min	EMS: 2,330 Non-EMS: 345
Response Time: (January to June 2025) average time (turnout time + travel time) in the station area. Incident counts: (January to June 2025). Non-EMS is fire emergency. EMS is emergency medical service. http://lafd.org/sites/default/files/pdf/files/11-03-2014AllStations.pdf Light Force: Truck company and single engine. Task Force: Truck company and two fire engines. LAFD November 2022 Fire Station Directory.					

The Project would be required to comply with all applicable provisions of the Los Angeles Fire Code, including requirements for fire-flow, fire hydrant spacing, emergency vehicle access, automatic fire sprinkler systems, fire alarm and detection systems, standpipes, and other life-safety measures. All fire/life-safety systems and site access features would be reviewed and approved by LAFD during plan check, ensuring that the building incorporates adequate fire protection measures.

In addition, the Project includes a comprehensive security program that would further support life-safety conditions on site. The building would feature premium, professionally managed security systems, including internally accessed storage units; a unique passcode required for building entry and elevator usage; logged entry and exit times; and maximum parking-lot lighting consistent with security best practices. Access to the building would occur through the ground-floor lobby, with elevators and stairwells located at the southwestern and northeastern corners of the structure. The Project would include 24/7 digital security-camera monitoring of the parking area, loading zones, elevator lobbies, and all internal corridors, with no blind spots. Storage-unit locks would be provided by USSC to ensure consistent, high-grade security standards. Customer access hours would be limited between 6:00 AM and 11:00 PM, and passcodes would not permit access outside of those hours. The security program would also include controlled access points, monitored entrances and exits, monitoring of fire/life-safety systems, and security lighting, all of which reduce opportunities for unsafe conditions and minimize the potential need for emergency response.

Construction activities would be temporary, would occur in an existing urban setting already served by LAFD, and would not require specialized fire-service resources beyond typical construction oversight. Construction staging would be reviewed to maintain emergency access along San Vicente Boulevard, Longwood Avenue, and Tremaine Avenue.

Given the Project's low-intensity use; its location within an area already served by LAFD; the incorporation of compliant fire/life-safety systems and secured-access features; and the fact that the Project would not introduce substantial population or hazardous operations, the Project would not necessitate new or expanded fire protection facilities. Therefore, Project impacts related to fire protection services would be less than significant.

Cumulative Impacts

There are three (3) related projects identified by the City within 0.5 miles of the Project (see **Table 4.21-1**). Cumulative conditions consider implementation of the Project together with these three (3) residential related projects, which together would add a total of 178 new dwelling units in the Project Site area. Residential developments typically generate the highest demand for fire protection services because they introduce new long-term population, increased emergency medical service needs, and 24-hour occupancy patterns. In contrast, the Project is a low-intensity self-storage facility with minimal staffing, limited customer presence, and restricted operating hours. The Project would not introduce residential population or substantial on-site activity that would cumulatively contribute to increased emergency call volumes. The Project also incorporates extensive fire/life-safety measures, including automatic sprinklers, controlled access, monitored security systems, and full compliance with the Los Angeles Fire Code, which

minimize fire-related risks. The related projects' incremental increase in residential population would be served by existing LAFD stations operating within the City's response standards and funded through standard development fees. The Project itself would not generate demand for new or expanded fire facilities and would not combine with the related projects to create a cumulatively considerable fire-service impact. Therefore, cumulative impacts related to fire protection services would be less than significant.

b) Police Protection?

Less Than Significant Impact. Police protection services in the Project area are provided by the Los Angeles Police Department (LAPD), Wilshire Division. The Project Site is located in a fully urbanized area currently served by existing patrol routes, response infrastructure, and established emergency service networks. The Project would replace an existing single-story warehouse with a new, seven-story self-storage facility, a land use that typically generates very low levels of on-site activity and minimal police-service calls when compared to residential, retail, or entertainment uses.

The Project includes a robust security program that would further reduce potential demand for police services. Security features include a controlled-access building with internally accessed storage units; a unique passcode required for building entry, elevator use, and after-hours restrictions; logged entry and exit times; maximum parking-lot security lighting; and high-grade USSC-provided storage-unit locks. The building would be monitored 24 hours a day through digital surveillance cameras covering all parking areas, loading zones, elevator lobbies, and interior corridors with no blind spots. Customer access would be limited to 6:00 AM to 11:00 PM, and pin codes would not function outside of those hours. These features substantially limit unauthorized access, discourage loitering, and reduce opportunities for theft or vandalism.

The Project would employ minimal staff and experience low on-site occupancy throughout the day. The security program would also include monitoring of entrances and exits, controlled access points, and interior/exterior security lighting that conforms to industry best practices. As a result, the Project would not generate substantial new demand for police protection services or necessitate the construction or expansion of police facilities. Therefore, Project impacts related to police protection services would be less than significant.

Cumulative Impacts

There are three (3) related projects identified by the City within 0.5 miles of the Project (see **Table 4.21-1**). These three (3) residential related projects Could introduce new long-term population to the Project Site area, potentially increasing demand for police protection services as residential uses typically generate higher call volumes, greater 24-hour activity, and a broader range of service needs. However, these incremental population increases are associated with needed housing in the City, are within regional growth projections and would be supported by the LAPD Wilshire Division's existing patrol districts and response infrastructure. The Project would not include residential population, does not involve uses typically associated with elevated police demand, and incorporates extensive security features that reduce opportunities for crime. These include controlled access; individualized passcodes; time-restricted customer access; 24/7 digital surveillance with no blind spots; monitored entry/exit logs; and security lighting. Such measures substantially reduce the likelihood of theft, vandalism, or unauthorized entry and reduce the need

for LAPD response. Because the Project would not meaningfully add to long-term population or service demand, and because its security program minimizes potential site-specific incidents, the Project's incremental contribution to cumulative police service needs would be negligible. The related projects' residential uses would generate police-service demand consistent with normal growth levels, and LAPD funding mechanisms remain in place to support such incremental demand. Therefore, cumulative impacts related to police protection services would be less than significant.

c) Schools?

Less Than Significant Impact.

The Project Site is located within the boundaries of the Los Angeles Unified School District (LAUSD), which is divided into six local districts. The Project is located within the West Local District. The Project is served by the following LAUSD schools:

- Alta Loma Elementary School (grades K-5), 1745 Vineyard Avenue, 1,800 feet south of the site
- Johnnie L. Cochran Jr Middle School (grades 6-8), 4066 Johnnie Cochran Vista, 4,400 feet southeast of the site
- Los Angeles High School (grades 9-12), 4650 Olympic Boulevard, 2,775 feet northeast of the site

As shown in **Table 4.15-2**, the Project would generate approximately 3 students.

**Table 4.15-2
Estimated Student Generation**

Land Use	Project Amount	Student Generation			
		Elementary	Middle	High	Total
Multi-Family Dwelling Units	0	-	-	-	-
Commercial	175,047 sf	1	1	1	3
Total		1	1	1	3

Los Angeles Unified School District (LAUSD), 2024 Developer Fee Justification Study, February 2024, <https://www.lausd.org/domain/921>, accessed June 17, 2024.
 Table 3, Student Generation Factors, Students per household: 0.19142 elementary (grades TK-6), 0.05279 middle (grades 7-8); 0.10504 high (grades 9-12).
 Table 15, Summary of Commercial and Industrial Uses, Students per 1,000 sf: 0.489 for neighborhood shopping centers, 0.204 for lodging, 0.011 for rental self-storage.
 Since the Study does not specify the grade levels of students that are generated from non-residential land uses, such students are assumed to be divided among the residential generation factors (i.e. approximately 55 percent for elementary, 15 percent for middle, and 30 percent for high school).

Pursuant to SB 50, the Applicant would be required to pay development fees for schools to LAUSD prior to the issuance of the Project's building permit. Pursuant to Government Code Section 65995, the payment of these fees fully addresses Project-related school impacts. Thus, the Project would not result in substantial adverse physical impacts associated with the provision

of new or physically altered government facilities (i.e., schools), need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools. The Project would not result in the need for new or expanded school facilities. Therefore, Project impacts related to schools would be less than significant.

Cumulative Impacts

There are three (3) related projects identified by the City within 0.5 miles of the Project (see **Table 4.21-1**). These related projects are located within the LAUSD service boundaries and include development of a total of 178 new residential units, which could incrementally increase school enrollment. LAUSD collects statutory developer school fees to address incremental school facility demand from new housing. However, similar to the Project Applicant, the applicants of all the related projects would be required to pay the state-mandated applicable school fees to the LAUSD to ensure that no significant impacts on school services would occur. Therefore, the cumulative impact on school services would be less than significant.

d) Parks?

No Impact. The Project includes development of a self-storage facility that would employ a small number of staff responsible for facility management, customer service, and security oversight. These employees would be present on-site primarily during daytime business hours and would not constitute a new residential population within the service area of local parks. Employee presence at a workplace does not generate demand for park space in the same manner as residential development, which increases long-term population, household occupancy, and recreational needs. Any employees of the self-storage facility would already reside in the region and utilize parks and recreational facilities near their existing homes, not near the Project Site. Their presence at the site would be limited to work hours and would not create new or permanent park-serving population. As a result, employees associated with the Project would not increase demand for public parks or require new or expanded park facilities. Therefore, no impacts related to parks would occur as a result of the Project.

Cumulative Impacts

There are three (3) related projects identified by the City within 0.5 miles of the Project (see **Table 4.21-1**). These three (3) related projects include development of a total of 178 new residential units, which could incrementally increase demand for parks. This increase would be partially offset through the City's park impact fee programs (e.g., the Quimby Act and the City's Park Fee Ordinance), which require residential developers to contribute funding for park improvements, expansion, or acquisition. As discussed above, the Project is non-residential and does not generate population or create new demands on park facilities. Customers visit briefly and do not use park amenities. Employee counts would be minimal and would not meaningfully affect recreational demand. Therefore, cumulative impacts related to parks would be less than significant.

e) Other Public Facilities?

No Impact. The Project includes development of a self-storage facility with minimal staffing and no residential component. Library service demands are closely tied to increases in permanent population because residential uses generate long-term demand for library resources, including borrowing materials, attending programs, and utilizing on-site study spaces and computer facilities. Non-residential, employment-based projects like the proposed self-storage facility do not generate comparable demand for library services. The Project would employ only a small number of workers who would be on site during daytime business hours. These employees would already reside within the region and would continue to utilize library services near their existing homes, not near the Project Site. Customer visits to the self-storage facility would be brief, intermittent, and service-oriented and would not increase demand for library materials or programs. The Project would not introduce residents, schools, or other uses that traditionally increase library demand. Because the Project would not generate new population and would not create or indirectly stimulate long-term use of the Los Angeles Public Library system, the Project would not result in the need for new or expanded library facilities. Therefore, Project impacts related to library services would be less than significant.

Cumulative Impacts

There are three (3) related projects identified by the City within 0.5 miles of the Project (see **Table 4.21-1**). These three (3) related projects include development of a total of 178 new residential units, which could incrementally increase demand for library services, given that library service demand is primarily population-based. However, this increase is within projected regional growth and consistent with projected growth forecasts. As discussed above, the Project would not introduce new residents, would not include uses that would increase library demand, and would only employ a small number of staff. Customers of the self-storage facility are intermittent and do not use library services as part of the Project's operations. Therefore, cumulative impacts related to library services would be less than significant.

4.16 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"/>

Impact Analysis

- 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 includes development of a self-storage facility that would employ a small number of staff responsible for facility management, customer service, and security oversight. These employees would be present on-site primarily during daytime business hours and would not constitute a new residential population within the service area of local parks and recreational facilities. Employee presence at a workplace does not generate demand for parks and recreational facilities in the same manner as residential development, which increases long-term population, household occupancy, and recreational needs. Any employees of the self-storage facility would already reside in the region and utilize parks and recreational facilities near their existing homes, not near the Project Site. Their presence at the site would be limited to work hours and would not create new or permanent park-serving population. As a result, employees associated with the Project would not increase demand for public parks or require new or expanded park facilities. Thus, the Project would not 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. Therefore, no impacts related to this issue would occur as a result of the Project.

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

No Impact. The Project does not include the development of any parks and recreational facilities. Thus, the Project would not require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. Therefore, no impacts related to this issue would occur as a result of the Project.

Cumulative Impacts

There are three (3) related projects identified by the City within 0.5 miles of the Project (see **Table 4.21-1**). These three (3) related projects include development of a total of 178 new residential units, which could incrementally increase demand for parks and recreational facilities. This increase would be partially offset through the City's park impact fee programs (e.g., the Quimby Act and the City's Park Fee Ordinance), which require residential developers to contribute funding for park improvements, expansion, or acquisition. As discussed above, the Project is non-residential and does not generate population or create new demands on park and recreational facilities. Customers visit briefly and do not use park amenities. Employee counts would be minimal and would not meaningfully affect recreational demand. Therefore, cumulative impacts related to parks and recreational facilities would be less than significant.

4.17 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 checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The information and analysis presented below is largely based on the following source (refer to Appendix H):

H VMT Screening Analysis, EPD Solutions, September 16, 2025

Impact Analysis

a) Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Less Than Significant Impact. Pursuant to the LADOT August 2022 *Transportation Assessment Guidelines* (TAG), projects should be analyzed to identify potential conflicts with programs, policies, plans, or ordinances that are adopted to protect the environment. Pursuant to the TAG, in general, transportation policies or standards adopted to protect the environment are those that support multimodal transportation options and a reduction in VMT. Each of the documents listed in the TAG (Table 2.1-1) was reviewed for applicability to the Project, and the relevant transportation-related policies are summarized below, along with the Project’s conformance or non-conformance with each.

Mobility Plan 2035

The Mobility Plan combines “complete street” principles with the following five goals that define the City’s mobility priorities:

1. Safety First: Design and operate streets in a way that enables safe access for all users, regardless of age, ability, or transportation mode of choice.
2. World Class Infrastructure: A well-maintained and connected network of streets, paths, bikeways, trails, and more provides Angelenos with the optimum variety of mode choices.
3. Access for All Angelenos: A fair and equitable system must be accessible to all and must pay particularly close attention to the most vulnerable users.
4. Collaboration, Communication, and Informed Choices: The impact of new technologies on our day-to-day mobility demands will continue to become increasingly important to the future. The amount of information made available by new technologies must be managed responsibly in the future.
5. Clean Environments and Healthy Communities: Active transportation modes such as bicycling and walking can significantly improve personal fitness and create new opportunities for social interaction, while lessening impacts on the environment.

The Mobility Plan identifies key corridors within the Project’s transportation study area as components of various “mobility-enhanced networks.” Though no new specific improvements have been identified and there is no schedule for implementation, the mobility-enhanced networks represent a focus on improving a particular aspect of urban mobility, including transit, neighborhood connectivity, bicycles, pedestrians, and vehicles. The Project would be designed consistent with the mobility-enhanced networks and would not impede the City’s ability to implement improvements along the streets surrounding the Project Site.

The Mobility Plan also designates street and sidewalk width standards based on the functional classification. LAMC Section 12.37 states that a project must dedicate and improve adjacent streets to half-right of way standards consistent with the Mobility Plan. The Project is not required to make additional dedications to the public rights-of-way.

The Project also supports initiatives of the Mobility Plan to create transit-oriented developments as it results in the construction of a residential mixed-use development on an infill site served by transit, supporting Metro ridership goals and enhancing transportation mobility. The Project is located in an urbanized area within proximity to transit stops that would encourage use of alternative transportation modes. The Project includes pedestrian enhancements surrounding the Project Site, such as landscaping, sidewalk improvements, and pedestrian access to the Project Site. The Project’s proposed land use and design features including site access; pedestrian, bicycle, and transit accessibility; and loading areas, would not conflict with the policies of the Mobility Plan 2035.

Wilshire Community Plan

The Project does not conflict with the transportation components of the Wilshire Community Plan. As previously discussed, the Project incorporates bicycle parking that would improve mobility for visitors and promote the use of alternative transportation modes.

2020–2045 RTP/SCS

Objective 6 of the 2020–2045 RTP/SCS calls for a circulation system that is coordinated with land uses and densities and adequate to accommodate traffic, and for the expansion and improvement of public transportation service. The Project Site is located in an urbanized area and designated PGAs, including an HQT, NMA, and Livable Corridor, that is well served by public transit. The Project would include various streetscape improvements and ground level commercial uses that would activate the surrounding pedestrian environment and enhance walkability. Furthermore, the Project would provide bicycle parking per LAMC requirements. Thus, the Project would coordinate land use and circulation by promoting opportunities for the use of alternative modes of transportation, including use of public transportation, walking, and bicycling.

b) **Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?**

Less Than Significant. SB 743, which went into effect in January 2014, requires the Governor's Office of Planning and Research to change the way public agencies evaluate transportation impacts of projects under CEQA. Under SB 743, the focus of transportation analysis has shifted from driver delay, which is typically measured by traffic level of service (LOS), to a new measurement that better addresses the State's goals on reduction of greenhouse gas emissions, creation of multi-modal transportation, and promotion of mixed-use developments. CEQA Guidelines Section 15064.3 states that VMT is the most appropriate measure of transportation impacts, replacing LOS.

On July 30, 2019, the City adopted the CEQA Transportation Analysis Update, which sets forth the revised thresholds of significance for evaluating transportation impacts as well as screening and evaluation criteria for determining impacts. The CEQA Transportation Analysis Update establishes VMT as the City's formal method of evaluating a project's transportation impacts. In conjunction with this update, LADOT adopted its TAG, which defines the methodology for analyzing a project's transportation impacts in accordance with SB 743. The TAG identifies distinct thresholds regarding significant VMT impacts for the seven Area Planning Commission (APC) areas in Los Angeles.

According to the LADOT TAG, daily vehicle trips should be estimated using either the City's VMT Calculator tool or the most recent edition of the ITE Trip Generation Manual. For this analysis, the most recent edition of the ITE Trip Generation Manual (12th Edition) was used. The Project is estimated to generate 194 net new daily passenger vehicle trips, which is below the 250-daily-trip threshold. As a result, the Project can be presumed to have a less-than-significant impact on VMT. Thus, the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). Therefore, Project impacts related to this issue would be less than significant.

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

Less Than Significant Impact. Pursuant to LADOT's TAG (Threshold T-3) the determination of significance regarding hazards due to a geometric design feature or incompatible uses should be based on commonly-accepted traffic engineering design standards (while considering the amount of pedestrian and bicycle activity crossing vehicular access points, sight distance and physical conditions such as curves or grade changes, and the project's proximity to streets identified in the High Injury Network or the Safe Routes to School program.

The Project's vehicular driveways would be designed to City standards and would provide adequate sight distance. They would not require the removal or relocation of existing public transit stops. Loading would be provided on-site. The new driveways would be designed in accordance with the regulatory standards and subject to the approval of LADOT and Bureau of Engineering.

Pedestrian and bicycle volumes are expected to increase to and from the Project Site. Nonetheless, the Project is designed to encourage and accommodate the increases in pedestrian and bicycle activity to and from the Project Site, though not in sufficient quantities to result in a significant conflict with the vehicles using the access points. Further, with the reduction of three existing driveways to two, the Project would be designed to minimize vehicle/pedestrian conflicts.

Currently, the sidewalks along the Project frontages provide a continuous pedestrian connection to the Project Site. The Project includes pedestrian enhancements surrounding the Project Site, such as landscaping and sidewalk improvements. Pedestrian access to the Project would be provided via street-facing entrances along Longwood Avenue. This would allow easy access to the public right-of-way and other destinations. The Project's pedestrian access locations would be designed to the City standards and would not increase hazards by introducing entrances that would cause visibility issues or conflicts between vehicles and pedestrians.

Further, pedestrian and bicycle access to the Project Site would be separated from vehicular traffic. The Project improvements would not preclude or interfere with the implementation of any other future roadway improvements benefiting pedestrians or bicycles. The Project driveway would be designed and placed to provide adequate sight distance and pedestrian refuge areas to limit potential vehicular-bicycle or vehicular-pedestrian conflicts. Based on the above, the Project does not present geometric design hazards related to mobility or pedestrian accessibility. Thus, the Project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). Therefore, Project impacts related to this issue would be less than significant.

d) Would the project result in inadequate emergency access?

Less Than Significant Impact. The Project would not result in inadequate emergency access. The Project Site is located along San Vicente Boulevard, a major arterial roadway that provides direct and unobstructed access for emergency vehicles. Additional access is available via Longwood Avenue and Tremaine Avenue along the western and eastern edges of the block, respectively. During construction, all activities would be required to comply with standard City conditions ensuring that emergency access is maintained at all times, including keeping adjacent

rights-of-way clear, maintaining unobstructed travel lanes, and coordinating any temporary closures with the LAFD.

During operation, the Project has been designed to meet all applicable LAFD access requirements, including fire-lane clearances, on-site maneuvering, and fire/life-safety provisions that would be reviewed and approved during LAFD plan check. Emergency personnel would have direct access to the ground-floor lobby, elevators, stairwells located at the southwestern and northeastern corners of the building, and all interior corridors. The Project would include controlled access, security monitoring, and adequate lighting that would assist responders in locating and entering the building quickly if needed.

The Project would not alter the surrounding street network, obstruct emergency routes, or introduce any physical design feature that would impede emergency response. Given the site's urban location, maintained roadway access, and compliance with Fire Code and LAFD plan-review requirements, the Project would not result in inadequate emergency access. Therefore, Project impacts related to this issue would be less than significant.

Cumulative Impacts

OPR's *Technical Advisory on Evaluating Transportation Impacts in CEQA* states the following regarding cumulative traffic impacts:

*Cumulative Impacts. A project's cumulative impacts are based on an assessment of whether the "incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects." (Pub. Resources Code, § 21083, subd. (b)(2); see CEQA Guidelines, § 15064, subd. (h)(1).) When using an absolute VMT metric, i.e., total VMT (as recommended below for retail and transportation projects), analyzing the combined impacts for a cumulative impacts analysis may be appropriate. However, metrics such as VMT per capita or VMT per employee, i.e., metrics framed in terms of efficiency (as recommended below for use on residential and office projects), cannot be summed because they employ a denominator. A project that falls below an efficiency-based threshold that is aligned with long-term goals and relevant plans has no cumulative impact distinct from the project impact. Accordingly, a finding of a less-than-significant project impact would imply a less than significant cumulative impact, and vice versa. This is similar to the analysis typically conducted for greenhouse gas emissions, air quality impacts, and impacts that utilize plan compliance as a threshold of significance. (See *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 62 Cal.4th 204, 219, 223; CEQA Guidelines, § 15064, subd. (h)(3).)*

As discussed above, the Project is screened out from further VMT analysis, as it is presumed the Project would cause less-than-significant transportation impacts. For this reason, the Project's cumulative contribution to traffic impacts would also be less than significant.

4.18 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 checked="" type="checkbox"/>	<input 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 I of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision I 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"/>

Impact Analysis

- 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:**
- i) **Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k), or**
 - ii) **A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision I of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision I 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 With Mitigation Incorporated. The City issued a Tribal Consultation on November 20, 2025. Subsequently the Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation) requested government-to-government consultation with the City pursuant to Assembly Bill 52 and CEQA. The Kizh Nation did not indicate that known tribal cultural resources exist at the site but requested that the Project incorporate tribal monitoring and associated measures into the Project that are standard for infill development in the City. These

measures are outlined below. As a result, with mitigation, the Project would not result in any significant impacts related to tribal cultural resources.

Mitigation Measures

The following mitigation measures are required to be implemented by the Project to ensure that Project impacts related to unknown tribal cultural resources would be less than significant:

MM-TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities

- A. The Applicant shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any “ground-disturbing activity” for the Project at all Project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). “Ground-disturbing activity” shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.
- B. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.
- C. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered tribal cultural resources, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the City upon written request to the Tribe.
- D. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Gabrieleño Band of Mission Indians – Kizh Nation from a designated point of contact for the Project Applicant that all ground-disturbing activities and phases that may involve ground-disturbing activities on the Project site or in connection with the Project are complete; or (2) a determination and written notification by the Gabrieleño Band of Mission Indians – Kizh Nation to the City that no future, planned construction activity and/or development/construction phase at the Project Site possesses the potential to impact Gabrieleño Band of Mission Indians – Kizh Nation tribal cultural resources.

MM-TCR-2: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial)

- A. Upon discovery of any tribal cultural resources, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered tribal cultural resource has been fully assessed by the Gabrieleño Band of Mission Indians – Kizh Nation monitor and/or archaeologist. The Gabrieleño Band of

Mission Indians – Kizh Nation will recover and retain all discovered tribal cultural resources in the form and/or manner the Tribe deems appropriate, in the Tribe’s sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.

MM-TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects

- A. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.
- B. If Native American human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed.
- C. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).
- D. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods.

Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

Cumulative Impacts

Impacts related to tribal cultural resources tend to be site-specific and are assessed on a site-by-site basis. The City requires the applicants of all development in the City that are subject to CEQA to assess, determine, and mitigate any potential impacts related to tribal cultural resources that could occur as a result of development, as necessary. As discussed previously, the Project would implement Mitigation Measures MM-TCR-1 through -3 that require monitoring and associated measures required in the event that resources are encountered that are standard for infill development in the City and not result in any impacts to tribal cultural resources. As such, the Project would not contribute to any potential cumulative impacts related to tribal cultural resources. Therefore, cumulative impacts related to cultural resources would be less than significant.

4.19 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"/>

Impact Analysis

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

Less Than Significant Impact. As discussed below, Project impacts related to water facilities, wastewater treatment, storm water drainage, electric power, natural gas, and telecommunications facilities would be less than significant.

Water Facilities

Water conveyance infrastructure in the vicinity of the Project Site is owned and maintained by the Los Angeles Department of Water and Power (LADWP) and includes an 8-inch water line in San Vicente Boulevard. As shown in **Table 4.19.1**, the Project operation would result in a net increase water consumption of approximately 4,556 gpd (0.005 mgd) of water. It should be noted that this

does not account for the effectiveness of water conservation measures required in accordance with the City’s Green Building Code, which would likely reduce the Project’s water consumption (and wastewater generation).

Table 4.19-1
Estimated Project Water Consumption and Wastewater Generation

Land Use	Size	Rates	Total (gpd)
Existing Consumption			
Warehouse	23,151 sf	30 gallons/1,000 sf	695
Project Consumption			
Self-storage	175,047 sf	30 gallons/1,000 sf	5,251
<i>Less Existing</i>			<i>(695)</i>
Net Total			4,556
Note: sf = square feet; gpd = gallons per day Rates: Los Angeles Bureau of Sanitation, Sewage Generation Factor, effective date April 6, 2012. https://permitmanual.engineering.lacity.gov/sites/default/files/documents/Sewage%20Generation%20Factors%20Chart.pdf Wastewater generation is assumed to equal water consumption. Per the LADWP: “For estimating a project’s indoor water demand, we use applicable sewer generation factors (sgf).”			

During the Project’s permitting process, the Applicant would be required to coordinate with LADWP to assess the Project’s water needs and install appropriately sized infrastructure to serve the Project. Further, the Applicant would be required to file an encroachment application with LADWP to ensure no conflicts related to the water line that crosses the Project Site and the proposed development. The Project would not require or result in relocation or the construction of new water conveyance infrastructure. Therefore, Project impacts related to water facilities would be less than significant.

Cumulative Impacts

There are three (3) related projects identified by the City within 0.5 miles of the Project (see **Table 4.21-1**). These three (3) related projects include development of a total of 178 new residential units, which could increase the need for water conveyance infrastructure. As shown in **Table 4.19-2**, cumulative development would result in water consumption of approximately 31,256 gpd (0.03 mgd). It should be noted that this does not account for the net reduction of water consumption associated with the removal of existing uses associated with the related projects or the effectiveness of water conservation measures required in accordance with the City’s Green Building Code, which would likely reduce cumulative water consumption (and wastewater generation).

Table 4.19-2
Estimated Cumulative Water Consumption and Wastewater Generation

Land Use	Size	Rates	Total (gpd)
Multi-Family Residential	178 du	150 gpd/du	26,700
Plus Project			4,556
Cumulative Total			31,256
du = dwelling unit gpd = gallons per day Rates: Los Angeles Bureau of Sanitation, Sewage Generation Factor, effective date April 6, 2012. https://permitmanual.engineering.lacity.gov/sites/default/files/documents/Sewage%20Generation%20Factors%20Chart.pdf Wastewater generation is assumed to equal water consumption. Per the LADWP: "For estimating a project's indoor water demand, we use applicable sewer generation factors (sgf)." 			

The sites of the related projects are located in a highly urban area of the City and are more than 0.25 miles from the Project Site. The related projects do not share any water conveyance infrastructure in common with the Project. Similar to the Project, the applicants of the related projects would be required to coordinate with LADWP to determine the water needs of each respective related project and install appropriately sized infrastructure for the related project. Cumulative development would not require or result in relocation or the construction of new water conveyance infrastructure. Therefore, cumulative impacts related to water facilities would be less than significant.

Wastewater Treatment

LASAN operates and maintains the wastewater treatment, reclamation, and collection facilities serving most of the City incorporated areas, including the Project Site, as well as several other cities and unincorporated areas in the Los Angeles basin and San Fernando Valley. Wastewater generated by the Project would be conveyed via the existing wastewater conveyance system for treatment at the Hyperion Treatment Plant (HTP) System.

The Project Site is located within the service area of the Hyperion Treatment Plant (HTP), which has been designed to treat 450 million gallons per day (mgd) to full secondary treatment. Full secondary treatment prevents virtually all particles suspended in effluent from being discharged into the Pacific Ocean and is consistent with the LARWQCB discharge policies for the Santa Monica Bay. The HTP currently treats an average daily flow of approximately 275 mgd.³⁸ Thus, there is approximately 175 mgd available capacity.

The sewer infrastructure in the vicinity of the Project includes an existing 8-inch line on the alley directly south of the site between Longwood Avenue and Tremaine Avenue.³⁹

As shown in **Table 4.19-1**, the Project would generate a net increase of approximately 4,556 gpd (0.005 mgd) of wastewater. The Project's average daily wastewater flow of 0.005 mgd would

³⁸ LA Sanitation, Hyperion Treatment Plant: https://sanitation.lacity.gov/san/faces/wcnav_externalld/s-lsh-wwd-cw-p-hwrp-tp?_adf.ctrl-state=zjgdf4yhg_10&_afLoop=16488136506800672#!, accessed August 4, 2025.

³⁹ NavigateLA with Sewer layer: <http://navigatela.lacity.org/index01.cfm>.

represent substantially less than one percent of the available capacity of the HTP. As such, there would be adequate wastewater treatment capacity to accommodate the Project. Therefore, Project impacts related to wastewater treatment would be less than significant.

Cumulative Impacts

There are three (3) related projects identified by the City within 0.5 miles of the Project (see **Table 4.21-1**). These three (3) related projects include development of a total of 178 new residential units, which could increase the need for wastewater treatment. As shown in **Table 4.19-2**, cumulative development would result in wastewater generation of approximately 31,256 gpd (0.03 mgd). It should be noted that this does not account for the net reduction of water consumption (and wastewater generation) associated with the removal of existing uses associated with the related projects or the effectiveness of water conservation measures required in accordance with the City's Green Building Code, which would likely reduce cumulative water consumption (and wastewater generation). As noted above, the HTP has a remaining daily treatment capacity of 175 mgd. Thus, there is adequate capacity to accommodate cumulative wastewater treatment needs. Therefore, cumulative impacts related to wastewater treatment would be less than significant.

Storm Drainage

As discussed in Checklist Section 10, Hydrology and Water Quality, the Project's storm drain needs could be accommodated by the existing storm drain infrastructure near the Project Site. The Project would not create the need for new or upgraded storm drain infrastructure. Therefore, Project impacts related to storm water drainage would be less than significant.

Cumulative Impacts

There are three (3) related projects identified by the City within 0.5 miles of the Project (see **Table 4.21-1**). The sites of the related projects are located in a highly urban area of the City and are more than 0.25 miles from the Project Site. The related projects do not share any storm drainage infrastructure in common with the Project. Similar to the Project, the applicants of the related projects would be required to coordinate with the City to determine the storm drain requirements of the respective related projects and install appropriately sized infrastructure for the related project. Therefore, cumulative impacts related to storm drainage would be less than significant.

Electricity

As discussed in Checklist Section 7, Energy, the Project's demand for electrical power could be accommodated by existing sources. The Project would not require the need for new or expanded electricity supplies. Therefore, Project impacts related to electrical power would be less than significant.

Cumulative Impacts

As discussed in the cumulative analysis provided in Checklist Section 7, Energy, cumulative development could be served by existing sources of electricity supply and would not create a

need for new or expanded electricity supplies. Therefore, cumulative impacts related to electrical power would be less than significant.

Natural Gas

As discussed in Checklist Section 7, Energy, the Project's demand for natural gas could be accommodated by existing sources. The Project would not require the need for new or expanded natural gas supplies. Therefore, Project impacts related to natural gas would be less than significant.

Cumulative Impacts

As discussed in the cumulative analysis provided in Checklist Section 7, Energy, cumulative development could be served by existing sources of natural gas supply and would not create a need for new or expanded natural gas supplies. Therefore, cumulative impacts related to natural gas would be less than significant.

Telecommunications

In the Project Site area, existing telephone service is typically provided by AT&T, and existing cable television/internet is typically provided by Spectrum (formerly Time Warner Cable). The Project Site could be served by existing telecommunications facilities that are available in the Project Site area and would not require new or expanded facilities. Therefore, Project impacts related to telecommunications facilities would be less than significant.

Cumulative Impacts

There are three (3) related projects identified by the City within 0.5 miles of the Project (see **Table 4.21-1**). The sites of the related projects are located in a highly urban area of the City and are served by existing telecommunications infrastructure. The related projects are located more than 0.25 miles from the Project Site and do not share any telecommunications infrastructure in common with the Project. The related projects would likely require project- or site-specific infrastructure to connect to the existing infrastructure and would not require new or expanded facilities. Therefore, cumulative impacts related to telecommunications infrastructure would be less than significant.

- 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. LADWP provides water service to the Project Site. LADWP's water supply sources include the Los Angeles Aqueduct (LAA), local groundwater, the SWP (supplied by the Metropolitan Water District [MWD]), the Colorado River Aqueduct (also supplied by MWD), and recycled water.

The California Urban Water Management Planning Act of 1984 requires every municipal water supplier who serves more than 3,000 customers or provides more than 3,000 acre-feet per year (AFY) of water to prepare an Urban Water Management Plan (UWMP) every five years to identify short-term and long-term water resources management measures to meet growing water

demands during normal, single-dry, and multiple-dry years. In the UWMP, the water supplier must describe the water supply projects and programs that may be undertaken to meet the total water use of the service area. The UWMP that is applicable to the Project is LADWP's 2020 UWMP.

The 2020 UWMP provides historical and forecasted water demands for the City. Total water demand varies annually and is contingent on various factors including population growth, weather, water conservation, drought, and economic activity. **Table 4.19-3** shows a breakdown of historical water demand for the LADWP service area. **Table 4.19-4** provides LADWP's projected water demand from 2025 to 2045 for average-year, single-dry-year, and multi-dry-year hydrological conditions.

More frequent and longer-lasting dry periods, regulatory constraints, and seismic risks that can result in water delivery system outages are causing increased stress on water supply reliability for LADWP. As such, in preparation to take reasonable actions to balance water demands with limited water supplies, LADWP has prepared a Water Shortage Contingency Plan (WSCP) that outlines a set of actions that the City can take in the event of a declared water supply shortage or emergency situation. The City has six standard water shortage levels and response actions, as summarized in **Table 4.19-5**. Under state law, LADWP has the authority to implement the water shortage actions outlined in the WSCP. In all water shortage cases, shortage response actions to be implemented are at the discretion of LADWP based on an assessment of the supply shortage, customer response, and the need for demand reductions. Upon proclamation by the Governor of a state of emergency under the California Emergency Services Action based on extended dry conditions, the state will defer to implementation of locally adopted water shortage contingency plans to the extent practicable. LADWP will coordinate with regional and local water suppliers for which it provided water supply services for possible proclamation of a local emergency, as necessary.

The Project would connect to the existing water conveyance infrastructure near the Project Site. As shown in **Table 4.19-1**, the Project would result in a net water consumption of approximately 4,556 gpd (0.005 mgd). Based on its 2020 UWMP, LADWP has supply capabilities that would be sufficient to meet expected demands from 2025 through 2045 under single dry-year and multiple dry-year hydrologic conditions. The Project Applicant would be required to comply with the water efficiency standards outlined in Los Angeles City Ordinance No. 180,822 and in the LAGBC to conserve water usage. Additionally, the Project would be subject to any water shortage response actions identified by LADWP to ensure water service availability. Further, prior to issuance of a building permit, the Project Applicant would be required to consult with LADWP to determine Project-specific water supply service needs and all water conservation measures that shall be incorporated into the Project. As such, the Project would not require new or additional water supply or entitlements. Therefore, Project impacts related to water supply would be less than significant.

Table 4.19-3
Breakdown of Historical Water Demand for LADWP's Service Area

Fiscal Year Ending Average	Single Family		Multi-Family		Commercial		Industrial		Government		Non-Revenue		Total
	AF	%	AF	%	AF	%	AF	%	AF	%	AF	%	AF
2016-2020	170,660	35%	141,088	28%	88,680	18%	14,938	3%	39,628	8%	40,690	8%	495,685
2011-2015	206,652	37%	161,592	29%	96,832	18%	17,855	3%	43,573	8%	26,139	6%	552,768
2006-2010	236,154	38%	180,277	29%	106,964	17%	23,196	4%	42,956	7%	30,617	5%	620,165
2001-2005	239,754	37%	190,646	29%	109,685	17%	21,931	3%	41,888	6%	52,724	8%	656,628
1996-2000	222,748	36%	191,819	31%	111,051	18%	23,560	4%	39,421	6%	33,696	5%	622,295
1991-1995	197,322	34%	177,104	30%	110,724	19%	21,313	4%	38,426	7%	39,364	7%	584,253
30-Year Average	212,215	36%	173,755	30%	103,990	18%	20,465	3%	40,982	7%	37,205	6%	588,611

AF = Acre Feet
Source: 2020 Urban Water Management Plan, LADWP.

Table 4.19-4
Service Area Reliability Assessment (AFY)

Hydrological Conditions ¹	Years				
	2025	2030	2035	2040	2045
Average Year	642,600	660,200	678,800	697,800	710,500
Single Dry Year	674,700	693,200	712,700	732,700	746,000
Multi-Dry Year (Year 1)	657,900	675,800	694,900	714,400	727,400
Multi-Dry Year (Year 2)	661,700	679,700	698,900	718,500	731,500
Multi-Dry Year (Year 3)	674,400	693,200	712,800	732,700	746,000
Multi-Dry Year (Year 4)	661,600	679,600	698,900	718,400	731,500
Multi-Dry Year (Year 5)	655,700	673,600	692,600	712,000	724,900

AFY = acre-feet per year
Source: 2020 UWMP, LADWP, Exhibits 11E, 11F, and 11G.

**Table 4.19-5
Water Shortage Response Actions**

Water Shortage Level	Percent Shortage	Shortage Response Actions
Level 1: No Shortage	≤10%	<p>Water Shortage Level 1 constitutes a consumer demand reduction of up to 10%. Shortage response actions under this level include the permanent water use restrictions listed below.</p> <p><u>Phase I Restrictions</u></p> <ul style="list-style-type: none"> - No LADWP customer shall use a water hose to wash any paved surfaces, except to alleviate immediate safety or sanitation hazards. - No LADWP customer shall use water to clean, fill or maintain levels in decorative fountains, ponds, lakes, or similar structures used for aesthetic purposes, unless such water is part of a recirculating system. - No restaurant, hotel, cafe, cafeteria, or other public place where food is sold, served, or offered for-sale, shall serve drinking water to any person unless expressly requested. - No LADWP customer shall permit water to leak from any pipe or fixture on the customer's premises.
Level 2: Moderate Shortage	≤20%	<p>Water Shortage Level 2 is implemented when there is a reasonable probability of supply shortage from LADWP-controlled supplies in the long-term and a demand reduction of up to 20% is necessary to mitigate this long-term shortage risk. Conservation Ordinance Phase 2 will be implemented to achieve the necessary demand reduction. Additionally, to reduce consumption during this phase and all higher levels of conditions, LADWP may increase its public education and outreach efforts and enforcement measure to build awareness of voluntary water conservation practices and all permanent water waste prohibitions.</p> <p><u>Actions</u></p> <p><u>Mandatory Conservation Phase 2</u></p> <ul style="list-style-type: none"> - Restrictions on landscape irrigation watering days (Monday, Wednesday, or Friday for odd-numbered street

**Table 4.19-5
Water Shortage Response Actions**

Water Shortage Level	Percent Shortage	Shortage Response Actions
		<p>addresses and Tuesday, Thursday, or Sunday for even-numbered street addresses).</p> <ul style="list-style-type: none"> - Irrigation of Sports Fields may deviate from the non-watering days to maintain play areas and accommodate event schedules. - Irrigation of large landscape areas may deviate from the non-watering days under certain conditions. - Provisions do not apply to drip irrigation supplying water to a food source or to hand-held hose watering of vegetation. - Increase outreach efforts for high-volume customers and provide one on one assessments. - Expand enforcement of unreasonable use of water. - Increase water conservation rebates and incentives. - Increase conservation messaging (radio, TV, social media, educational events).
<p>Level 3: Significant Shortage</p>	<p>≤30%</p>	<p>A Water Shortage Level 3: Significant Shortage is implemented when demand must be reduced up to 30% to ensure sufficient supplies. During a Significant Shortage, a new set of mandatory water conservation practices takes effect, in addition to all Permanent Water Waste Prohibitions and Level 1 and Level 2 conservation practices.</p> <p>Beginning with Water Shortage Level 3, LADWP may elect to withdraw from available emergency storage along the LAA system and from local groundwater basins. Emergency storage along the LAA may come in the form of emergency reservoir storage and/or emergency groundwater pumping in the Owens Valley with the approval of the LA/Inyo Standing Committee. Emergency storage from local groundwater basin may come in the form of storied water credits. Withdrawals from emergency supplies may provide only short-term relief and the extent of withdrawals will be determined based on assessments of long-term shortage risk.</p> <p><u>Actions</u></p>

**Table 4.19-5
Water Shortage Response Actions**

Water Shortage Level	Percent Shortage	Shortage Response Actions
		<p><u>Mandatory Conservation Phase 3</u></p> <ul style="list-style-type: none"> - Further restrictions on landscape irrigation watering days (Monday or Friday for odd-numbered street addresses and Sunday or Thursday for even-numbered street addresses) - Recommend use of pool covers to decrease water loss from evaporation. - Recommend washing of vehicles at commercial car wash facilities. - Irrigation of sports fields may deviate from the non-watering days to maintain play areas and accommodate event schedules. - Irrigation of large landscape areas may deviate from the non-watering days under certain conditions. - Provisions do not apply to drip irrigation supplying water to a food source or to hand-held hose watering of vegetation. - Withdraw from available emergency storage along the LAA System and local groundwater basins.
Level 4: Severe Shortage	≤40%	<p>Water Shortage Level 4: Severe Shortage is implemented when demand must be reduced up to 40% to ensure sufficient supplies. During a Severe Shortage, a new set of mandatory water conservation practices takes effect, in addition to all Permanent Water Waste Prohibitions and additional restriction practices that became mandatory under Water Shortage Level 1, Level 2, and Level 3. LADWP may also elect to increase withdrawals from available emergency storage along the LAA system and from local groundwater basins.</p> <p><u>Actions</u></p> <p><u>Mandatory Conservation Phase 4</u></p> <ul style="list-style-type: none"> - Further restrictions on landscape irrigation watering days (Monday for odd-numbered street addresses and Tuesday for even-numbered street addresses). - Mandate use of pool covers on all residential swimming pools when not in use.

**Table 4.19-5
Water Shortage Response Actions**

Water Shortage Level	Percent Shortage	Shortage Response Actions
		<ul style="list-style-type: none"> - No washing of vehicles allowed except at commercial car wash facilities. - No filling of decorative fountains, ponds, lakes, or similar structures used for aesthetic purposes, with potable water. - Irrigation of sports fields may deviate from the non-watering days to maintain play areas and accommodate event schedules. - Irrigation of large landscape areas may deviate from the non-watering days under certain conditions. - Provisions do not apply to drip irrigation supplying water to a food source or to hand-held hose watering of vegetation. - Withdraw from available emergency storage along the LAA System and local groundwater basins.
Level 5: Critical Shortage	≤50%	<p>Water Shortage Level 5: Critical Shortage is implemented when a water shortage emergency requires that demand be reduced up to 50% to ensure sufficient supplies.</p> <p>Mandatory conservation practices imposed under Water Shortage Levels 1 through 4 remain in effect and LADWP may elect to further increase withdrawals from available emergency storage along the LAA system and from local groundwater basins.</p> <p><u>Actions</u></p> <p><u>Mandatory Conservation Phase 5</u></p> <ul style="list-style-type: none"> - No landscape irrigation allowed. - No filling of residential swimming pools and spas with potable water. - No washing of vehicles allowed except at commercial car wash facilities. - No filling of decorative fountains, ponds, lakes, or similar structures used for aesthetic purposes, with potable water. - Golf courses and professional sports fields may apply water to sensitive areas, such as greens and tees, during non-daylight hours and only to the extent necessary to maintain minimum levels of biological viability.

**Table 4.19-5
Water Shortage Response Actions**

Water Shortage Level	Percent Shortage	Shortage Response Actions
		<ul style="list-style-type: none"> - Provisions do not apply to drip irrigation supplying water to a food source or to hand-held hose watering of vegetation. - Withdraw from available emergency storage along the LAA System and local groundwater basins.
Level 6: Super Critical Shortage	> 50%	<p>Water Shortage Level 6: Supercritical Shortage is implemented when a water shortage emergency requires that demand be reduced greater than 50% to ensure sufficient supplies. During a Supercritical Shortage, a new set of mandatory conservation measures takes effect, in addition to all Permanent Water Waste Prohibitions. Mandatory conservation practices that were imposed Levels 1 through 5 remain in effect. LADWP may elect maximize withdrawals from available emergency storage along the LAA system and from local groundwater basins for supply augmentation.</p> <p><u>Actions</u></p> <p>Mandatory Conservation Phase 6</p> <ul style="list-style-type: none"> - No landscape irrigation allowed. - No filling of residential swimming pools and spas with potable water. - No washing of vehicles allowed except at commercial car wash facilities. - No filling of decorative fountains, ponds, lakes, or similar structures used for aesthetic purposes, with potable water. - Golf courses and professional sports fields may apply water to sensitive areas, such as greens and tees, during non-daylight hours and only to the extent necessary to maintain minimum levels of biological viability. - Provisions do not apply to drip irrigation supplying water to a food source or to hand-held hose watering of vegetation. - The Board is hereby authorized to implement additional prohibited uses of water based on the water supply situation. Any additional prohibition shall be published at least once in a daily newspaper of general circulation and shall

**Table 4.19-5
Water Shortage Response Actions**

Water Shortage Level	Percent Shortage	Shortage Response Actions
		become effective immediately upon such publication and shall remain in effect until cancelled. <ul style="list-style-type: none"> - Withdraw from available emergency storage along the LAA and local groundwater basin. - Additional measures authorized by the Board.
<i>Source: 2020 UWMP, Appendix I, LADWP.</i>		

Cumulative Impacts

There are three (3) related projects identified by the City within 0.5 miles of the Project (see **Table 4.21-1**). These three (3) related projects include development of a total of 178 new residential units, which could increase the need for water supply. As shown in **Table 4.19-2**, cumulative development would result in water consumption of approximately 31,256 gpd (0.03 mgd). It should be noted that this does not account for the net reduction of water consumption associated with the removal of existing uses associated with the related projects or the effectiveness of water conservation measures required in accordance with the City's Green Building Code, which would likely reduce cumulative water consumption (and wastewater generation). As discussed previously, LADWP's 2020 UWMP anticipates meeting projected water supplies through the year 2045, through conservation measures for drought years, and LADWP's water shortage response actions identified (refer to **Table 4.19-5**). Similar to the Project, the related project would be required to comply with conservation programs for both water supply and infrastructure. For these reasons, cumulative impacts related to water supply would be less than significant.

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

Less Than Significant Impact. As discussed in response to Checklist Question 19(a), with a remaining daily capacity of 275 mgd, the HTP would have adequate capacity to serve the Project. Therefore, Project impacts related to wastewater treatment would be less than significant.

Cumulative Impacts

Refer to the cumulative impacts discussion included in response to Checklist Question 19(a) (Utilities and Service Systems – Wastewater Treatment).

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

Less Than Significant Impact. Based on the information provided in the 2023 Countywide Disposal Rate and Assessment of Disposal Capacity Report, the remaining disposal capacity for the County’s Class III landfills is estimated at approximately 131.14 million tons.⁴⁰ In 2023, the total amount of solid waste disposed of at in-county Class III landfills, transformation facilities, and out-of-County landfills was approximately 11.3 million tons and 317,601 tons of inert waste at the County’s inert landfill, for a grand total of 11.6 million tons.⁴¹

Of the remaining Class III landfill capacity in the County, approximately 71.59 million tons are available to the City (Antelope Valley, Lancaster, Sunshine Canyon).⁴²

The 2023 Annual Report indicates that the countywide cumulative need for Class III landfill disposal capacity, approximately 140.48 million tons in 2034, would exceed the 2023 remaining permitted Class III landfill capacity of 131.14 million tons.⁴³

As is the case with solid waste haulers, landfills operate in a free-enterprise system. Their operating funds and profits are obtained by collecting disposal fees from the haulers on a per ton basis. Landfill capacity is regulated primarily through the amount of solid waste that each particular facility is permitted to collect on a daily basis relative to its capacity.

Wasteshed boundaries, geographic barriers, weather, and natural disasters could place further constraints on accessibility of Class III landfill capacity. Therefore, the Annual Report evaluated four scenarios to increase capacity. Demand can be met for each year during the 15-year planning period. No new landfills are expected to be permitted in the County during the planning period.⁴⁴ The Annual Report also concluded that in order to maintain adequate disposal capacity, individual jurisdictions must continue to pursue strategies to maximize waste reduction and recycling, expand existing landfills, promote and develop alternative technologies, expand transfer and processing infrastructure, and use out of county disposal, including waste by rail.

The County’s unclassified landfill generally does not currently face capacity issues. The remaining disposal capacity for Azusa Land Reclamation is estimated at approximately 44.80 million tons.

⁴⁰ County of Los Angeles, Department of Public Works; Los Angeles Countywide Disposal Rate and Assessment of Disposal Capacity, 2023, page 16: <https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=18154&hp=yes&type=PDF>, August 4, 2025.

⁴¹ County of Los Angeles, Department of Public Works; Countywide Disposal Rate and Assessment of Disposal Capacity, 2023, Table 1: 2023 Disposal Tonnage Breakdown, page 8: <https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=18154&hp=yes&type=PDF>, accessed August 4, 2025.

⁴² Total excludes Class III landfills that are not open to the City of Los Angeles for disposal (i.e., Scholl Canyon, Whittier, Burbank, Pebbly Beach, and San Clemente). In addition, total excludes the Calabasas Landfill, as its wasteshed does not include the Project Site. The Chiquita Canyon Landfill Expansion permits the facility to operate until it reaches 60 million tons, or after 30 years, whichever comes first. However, since the current volume of the facility’s wasteshed is unknown, the volume of waste that it would take to reach 60 million tons cannot be determined. As such, for a conservative analysis, the Chiquita Canyon Landfill Expansion is excluded from the total.

⁴³ County of Los Angeles, Department of Public Works; Countywide Disposal Rate and Assessment of Disposal Capacity, 2023, page 2: <https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=18154&hp=yes&type=PDF>, accessed August 4, 2025.

⁴⁴ County of Los Angeles, Department of Public Works; Countywide Disposal Rate and Assessment of Disposal Capacity, 2023, page 22: <https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=18154&hp=yes&type=PDF>, accessed August 4, 2025.

In 2023, approximately 0.403 million tons of inert waste (e.g., soil, concrete, asphalt, and other construction and demolition debris) were disposed of at this unclassified landfill. Given the remaining permitted capacity, this capacity would be exhausted in 22 years.⁴⁵ Thus, the unclassified landfill serving the County has adequate long-term capacity.

While the City’s Bureau of Sanitation (BOS) generally provides waste collection services to single-family and some small multi-family developments, private haulers permitted by the City provide waste collection services for most multi-family residential and commercial developments within the City. Solid waste transported by both public and private haulers is either recycled, reused, or transformed at a waste-to-energy facility, or disposed of at a landfill.

In 2022, the City disposed of approximately 4 million tons of solid waste at the County’s Class III landfills, approximately 2,000 tons at transformation facilities, and 214 million tons at the inert landfill.⁴⁶ The 3.3 million tons of solid waste accounts for approximately 5.5 percent of the total remaining capacity (71.59 million tons) for the County’s Class III landfills open to the City.⁴⁷

The landfills that serve the City and the capacity of these landfills are shown on **Table 4.19-6**. As shown, the landfills have an approximate available daily intake of 10,242 tons.

**Table 4.19-6
Landfill Capacity**

Landfill Facility	2023 Average Daily Disposal (tons/day)	Maximum Daily Disposal (tons/day)	Remaining Daily Capacity (tons/day)	Remaining Capacity (million tons)	Remaining Life (years)
Class III Landfills (Open to the City)					
Antelope Valley	2,314	5,548	3,234	7.79	7
Lancaster	367	5,100	4,733	10.79	18
Sunshine Canyon	7,561	12,100	4,539	53.01	14
Total	10,242	22,748	12,506	71.59	
Inert Landfill (Open to the City)					
Azusa	1,018	8,000	6,982	44.80	22
County of Los Angeles, Department of Public Works; Countywide Disposal Rate and Assessment of Disposal Capacity, 2023, Appendix B, Table 1: https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=18154&hp=yes&type=PDF , accessed June 26, 2025.					

As shown in **Table 4.19-7**, the Project would result in approximately 2,390 tons of construction and demolition waste, not accounting for any mandatory recycling.

⁴⁵ County of Los Angeles, Department of Public Works; Countywide Disposal Rate and Assessment of Disposal Capacity, 2023, page 17: <https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=18154&hp=yes&type=PDF>, accessed August 4, 2025.

⁴⁶ These numbers represent waste disposal, not generation, and thus do not reflect the amount of solid waste that was diverted via source reduction and recycling programs within the City

⁴⁷ $4 \text{ million tons} \div 71.59 \text{ million tons} \times 100\% = 5.5\%$.

**Table 4.19-7
Project Demolition and Construction Waste Generation**

Building	Size	Rate	Total (tons)
Demolition Waste			
Residential	0 sf	127 pounds / sf	0
Non-residential	23,151 sf	158 pounds / sf	1,830
Asphalt	~4,800 sf	75 pounds / sf	180
Demolition Total			2,010
Construction Waste			
Residential	0 sf	4.39 pounds / sf	
Non-residential	175,047 sf	4.34 pounds / sf	380
Construction Total			380
Total			2,390
Over the entire total schedule of construction. Numbers have been rounded. sf = square feet, 1 ton = 2,000 lbs U.S. Environmental Protection Agency, Report No. EPA530-R-09-002, Estimating 2003 Demolition and Materials Amounts, March 2009, Table 2-1, Table 2-2, Table 2-3, Table 2-4: https://www.epa.gov/smm/estimating-2003-building-related-construction-and-demolition-materials-amounts 1 cubic foot of asphalt weighs 150 pounds. The asphalt at the site is assumed to be 6 inches thick.			

Pursuant to the requirements of Senate Bill 1374, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Materials that could be recycled or salvaged include asphalt, glass, and concrete. Debris not recycled could be accepted at the unclassified landfill (Azusa Land Reclamation) within Los Angeles County and within the Class III landfills open to the City.

In addition, pursuant to LAMC Sections 66.32 through 66.32.5 (Ordinance No. 181,519), the Project's construction contractor would be required to deliver all remaining construction and demolition waste generated by the Project to a certified construction and demolition waste processing facility. As discussed above, non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste, such as construction waste, yard trimmings, and earthlike waste, is disposed of in inert waste landfills. Thus, although the total diversion rate may ultimately exceed 75 percent, this analysis conservatively assumes a diversion rate of 75 percent.

Pursuant to the requirements of SB 1374, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of its nonhazardous demolition and construction debris.

After accounting for mandatory recycling, the Project would result in approximately 578 tons of construction-related waste in the County's permitted inert landfill (i.e., Azusa Land Reclamation Landfill) throughout the construction period. This amount of construction and debris waste would represent approximately 0.002 percent of the Azusa Land Reclamation Landfill's existing remaining disposal capacity of 44.80 million tons.

Given the remaining permitted capacity, the Azusa Land Reclamation facility, as well as the remaining capacity at the Class III landfills open to the City, the landfills serving the Project Site

would have sufficient capacity to accommodate the Project’s construction solid waste disposal needs.

It should be noted that soil export is not included in the calculation of construction waste since soil is not disposed of as waste but, rather, is typically used as a cover material or fill at other construction sites requiring soils import. As reported above, the Azusa Land Reclamation landfill, the County’s inert waste landfill, would be able to accommodate waste from the Project’s construction activities.

Based on the above, Project construction would not 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 and strategies identified in the ColWMP or by the City (refer to Response to Question No. 19(e) regarding consistency with City solid waste planning goals). Therefore, the Project’s potential construction-related impacts on solid waste facilities would be less than significant, and no mitigation measures would be required.

As shown on **Table 4.19-4**, the Project would generate a net total of approximately 8 tons per year of solid waste. While this estimate accounts for recycling and other waste diversion measures consistent with the Citywide diversion rate of 76.4 percent, it does not include implementation of the City’s Zero Waste Plan, which is expected to result in a reduction of landfill disposal Citywide with a goal of reaching a Citywide recycling rate of 90 percent by the year 2025.⁴⁸

**Table 4.19-8
Project Estimated Solid Waste Generation**

Land Use	Size	Rates	Total (Tons per year)
Proposed Project			
Commercial	11 employees	2.98 tons / employee	33
Proposed Total			33
(76.4% diversion)			(25)
Total Net Disposal			8
Note: 1 ton = 2,000 pounds. Non-residential yearly solid waste generation factors from Los Angeles Bureau of Sanitation, City Waste Characterization and Quantification Study, Table 4, July 2002. https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rate			

Likewise, the analysis does not include implementation of the City’s Zero Waste Plan, which is expected to result in a reduction of landfill disposal Citywide with a goal of reaching a Citywide recycling rate of 90 percent by the year 2025, 95 percent by 2035, and zero waste by 2030.⁴⁹

48 City of Los Angeles, Solid Waste Integrated Resource Plan FAQ; www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-zwswirp?adf.ctrl-state=102i43tjdg1&afrLoop=15884281038430535&afrWindowMode=0&afrWindowId=null#!%40%40%3FafrWindowId%3Dnull%26afrLoop%3D15884281038430535%26afrWindowMode%3D0%26adf.ctrl-state%3D102i43tjdg5, accessed August 4, 2025.

49 The recycLA program divides the City into 11 zones and designates a waste collection company for each zone. Source: LA Sanitation, recycLA, Your Plan, and City of Los Angeles, L.A.’s Green New Deal, Sustainable City pLAN 2019. <https://plan.lamayor.org/sites/default/files/pLAN2019final.pdf>, accessed August 4, 2025.

The Project's estimated annual net increase of 8tons represents approximately 0.0002 percent of the remaining capacity (71.59 million tons) for the County's Class III landfills open to the City. The Project's estimated solid waste generation would therefore represent a nominal percentage of the remaining daily disposal capacity of those landfills. The landfills that serve the Project Site have sufficient permitted capacity to accommodate the solid waste generated by the construction and operation of the Project. Therefore, no Project impacts related to solid waste would occur and the Project would adequately be served by existing facilities.

As such, Project operation would not 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 or strategies identified in the CoIWMP or by the City (refer to Response to Question No. 19(e) regarding consistency with City solid waste planning goals). Therefore, the Project's potential construction impacts to solid waste facilities would be less than significant, and no mitigation measures would be required.

Furthermore, as described in the 2023 Annual Report, the County will continue to address landfill capacity through the preparation of CoIWMP annual reports. The preparation of each annual report provides sufficient lead time (15 years) to address potential future shortfalls in landfill capacity. Solid waste disposal is an essential public service that must be provided without interruption in order to protect public health and safety, as well as the environment. Jurisdictions in the County of Los Angeles continue to implement and enhance the waste reduction, recycling, special waste, and public education programs identified in their respective planning directives. These efforts, together with countywide and regional programs implemented by the County and the cities, acting in concert or independently, have achieved significant, measurable results, as documented in the 2023 Annual Report.

Construction and operation of the Project would not 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. Thus, Project impacts related to solid waste disposal would be less than significant.

Cumulative Impacts

Given the level of urbanization present throughout the Project vicinity, it is anticipated that other projects would similarly represent a minor percentage of the remaining capacity of the County's Class III landfills open to the City. The demand for landfill capacity is continually evaluated by the County through preparation of the CoIWMP annual reports. Each annual CoIWMP report assesses future landfill disposal needs over a 15-year planning horizon. Based on the 2023 CoIWMP, the County anticipates that future disposal needs can be adequately met for the next 15 years (i.e., 2038) with implementation of strategies to maximize waste reduction and recycling, expand existing landfills, promote and develop alternative technologies, expand transfer and processing infrastructure, and use out of county disposal, including waste by rail. The preparation of each annual CoIWMP provides sufficient lead time (15 years) to address potential future shortfalls in landfill capacity. Therefore, cumulative impacts related to solid waste disposal would be less than significant.

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

Less Than Significant Impact. Solid waste management in the State is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): (1) source reduction; (2) recycling and composting; and (3) environmentally safe transformation and land disposal. In addition, AB 1327 provided for the development of the California Solid Waste Reuse and Recycling Access Act of 1991, which requires the adoption of an ordinance by any local agency governing the provision of adequate areas for the collection and loading of recyclable materials in development projects.

Furthermore, AB 341, which became effective on July 1, 2012, requires businesses and public entities that generate 4 cubic yards or more of waste per week and multi-family dwellings with five or more units, to recycle. The purpose of AB 341 is to reduce GHG emissions by diverting commercial solid waste from landfills and expand opportunities for recycling in California. In addition, in March 2006, the Los Angeles City Council adopted RENEW LA, a 20-year plan with the primary goal of shifting from waste disposal to resource recovery within the City, resulting in “zero waste” by 2030. The plan also calls for reductions in the quantity and environmental impacts of residue material disposed in landfills. In October 2014, Governor Jerry Brown signed AB 1826, requiring businesses to recycle their organic waste⁵⁰ on and after April 1, 2016, depending on the amount of waste generated per week. Specifically, beginning April 1, 2016, businesses that generate eight cubic yards of organic waste per week were required to arrange for organic waste recycling services. In addition, beginning January 1, 2017, businesses that generate four cubic yards of organic waste per week were required to arrange for organic waste recycling services.

The Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City’s Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include an on-site recycling area or room of specified size.⁵¹ The Project would also comply with AB 939, AB 341, AB 1826 and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling.

Additionally, the Project’s construction contractor would deliver all construction and demolition waste generated by the Project to a Certified Construction and Demolition Waste Processing Facility in accordance with City Ordinance No. 181,519. Furthermore, the Project would implement a construction waste management plan to divert a minimum of 75 percent waste from landfills, thus exceeding state requirements. As such, the Project would promote source reduction and recycling, consistent with AB 939 and the City’s Solid Waste Integrated Resources Plan, Source Reduction and Recycling Element, Solid Waste Management Policy Plan, General Plan Framework Element, RENEW LA Plan, Green LA Plan, and Sustainable City pLAN/L.A.’s Green New Deal.

50 Organic waste refers to food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste.

51 Ordinance No. 171,687, adopted by the Los Angeles City Council on August 6, 1997.

Overall, the Project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. Therefore, Project impacts related to this issue would be less than significant.

Cumulative Impacts

As with the Project, the related projects would be required to comply with applicable regulations related to solid waste, including those pertaining to waste reduction and recycling. Detailed components regarding waste reduction and recycling would be finalized for each Related Project on a project-by-project basis at the time of plan submittal to the City for the necessary building permits and reviews conducted pursuant to the City's Green Building Code, as applicable. Specifically, the Project and related projects would be required to promote source reduction and recycling, consistent with AB 939 and the City's Solid Waste Integrated Resources Plan, General Plan Framework Element, RENEW LA Plan, Green LA Plan, and Sustainable City pLAN/L.A.'s Green New Deal. Thus, construction and operation of the Project and the related projects would comply with applicable state or City solid waste regulations and would not result in significant cumulative impacts. Therefore, cumulative impacts related to this issue would be less than significant.

4.20 Wildfire

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<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"/>

Impact Analysis

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

No Impact. Neither the Project Site nor the sites of the related projects are located in or near a state responsibility area.⁵² Also, the Project Site is not located in a Very High Fire Hazard Severity Zone (VHFHSZ).⁵³ Therefore, no Project-specific or cumulative impacts would occur.

⁵² Cal Fire, State Responsibility Area Viewer: <https://bof.fire.ca.gov/projects-and-programs/state-responsibility-area-viewer/>, accessed June 17, 2024.

⁵³ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for 4828 San Vicente Boulevard, <https://zimas.lacity.org/>, accessed August 4, 2025.

4.21 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 checked="" type="checkbox"/>	<input 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 type="checkbox"/>	<input checked="" 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 With Mitigation Incorporated. As discussed in Checklist Section 5, Cultural Resources, and Checklist Section 18, Tribal Cultural Resources, with implementation of Mitigation Measures MM-TCR-1 through -3, the Project would not eliminate important examples of the major periods of California or prehistory.

- b) **Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?**

Less Than Significant Impact. The list of related projects is based on information provided by LADOT, and other recent studies, and include developments within a 0.5-mile radius of the Project

Site, as suggested in the Transportation Assessment Guidelines.⁵⁴ The cumulative analysis in this document takes into consideration the related projects listed in **Table 4.21-1**.

**Table 4.21-1
Related Projects**

#	Address	Distance	Use	Size	Status
1	5101 Pico Boulevard	2,225 feet west	Residential	136 units	To be constructed
2	1749 La Brea Avenue	2,600 feet southwest	Residential	15 units	To be constructed
3	1327 West Boulevard	1,975 feet east	Residential	27 units	To be constructed

Distance is measured from the Related Project's closest property line to the closest portion of the Project Site.

Related Projects List, Related Projects Summary from Case Logging and Tracking System, Los Angeles Department of Transportation (LADOT), June 27, 2025.

LA City Planning, Bi-Weekly Entitlement Case Filings: <https://planning.lacity.gov/resources/case-reports>

ZIMAS Case Numbers Report:
<https://zimas.lacity.org/reports/461df1ec364543a88ac312d4e87c966b.pdf>
 ZIMAS case numbers report: <https://zimas.lacity.org/>

Los Angeles Planning Case Numbers:
 No. 1: DIR-2022-3785-TOC-SPR-VHCA
 No. 2: DIR-2021-8818-TOC-HCA
 No. 3: ADM-2023-733-TOC-VHCA-ED1

For the reasons stated in this Initial Study, the Project would not have the potential to contribute to significant cumulative impacts.

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

Less Than Significant Impact. For the reasons stated in this Initial Study, the Project would not have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly.

⁵⁴ LADOT, Transportation Assessment Guidelines, page 2-3.

Section 5

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