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

INITIAL STUDY

525 South Virgil Avenue Project

Case Number: ENV-2025-5715-MND

Project Location: 515-531 South Virgil Avenue and 518-526 South Westmoreland Avenue

Community Plan Area: Wilshire Community Plan

Council District: 10 - Heather Hutt

Project Description: The 525 South Virgil Project (Project) is comprised of seven legal lots within one parcel (Assessor Parcel Number [APN] 5077-004-030) on an approximately 42,146 square foot (sf) (0.97 acre) lot.

The Project Site is currently developed with an approximately 56,072 sf, vacant four-story office building, a surface parking lot, and metal fencing. Vehicular access to the Project Site is currently provided by one driveway on Westmoreland Avenue. There are no trees located on the Project Site. Four Indian Laurel street trees (Ficus Nitida) are located adjacent to the Project Site along South Virgil Avenue in small sidewalk cutouts. These trees are not protected trees listed in the City's Preservation of Protected Trees Ordinance No. 186873. There are no street trees located on Westmoreland Avenue and no trees or landscaping on the Project Site. The Project proposes the removal of the two northern street trees on South Virgil Avenue and the retention of the two southern street trees on South Virgil Avenue.

The Project would demolish the existing 56,072 sf vacant office four-story building and its associated parking lot and construct an approximately 252,873 sf, eight-story self-storage building and ground-level parking. The new building would be approximately 90 feet, 11 inches tall. Self-storage uses would be located on the first through eighth floors. The ground floor would also contain an office, a lobby, restrooms, elevators, a transformer yard, and 50 bicycle parking spaces (25 short-term and 25 long-term). A street-level display window on Virgil Avenue showcasing products available for purchase would also be located on the ground floor of the Project. Also located on the ground floor would be approximately 24 covered automobile stalls, including two Americans with Disabilities Act (ADA) compliant stalls and three electric vehicle (EV) parking stalls. The Project would also include some drought-tolerant landscaping as well as multiple large murals. The Project would have an FAR of approximately 6.0.

Vehicular access to the Project Site is currently provided by one driveway on Westmoreland Avenue. The Project proposes to reconstruct and slightly shift the existing driveway on Westmoreland Avenue and to construct a new driveway on Virgil Avenue. Additionally, all loading, unloading, and refuse areas will be within the covered parking garage.

Development of the Project would require the export of approximately 5,600 cubic yards (cy) of soil, (7,280 cy with a 30-percent swell factor applied). For the purposes of this analysis, the Project's construction schedule is assumed to be approximately 18 months, with construction beginning in the

second quarter of 2027 and ending in the fourth quarter of 2028. The Project is anticipated to be operational in 2028.

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

Prepared By:
Kimley-Horn and Associates, Inc.

Applicant:
Shatto Emet QOZB LP

September 2026

Table of Contents

1 Introduction 1
1.1 Purpose and Scope of the Initial Study 1
1.2 Report Organization 1
1.3 CEQA Process 2
2 Executive Summary 3
3 Project Description 7
3.1 Project Summary 7
3.2 Environmental Setting 7
3.2.1 Project Location 8
3.2.2 Existing Conditions 8
3.2.3 General Plan and Zoning 9
3.3 Description of the Project 12
3.3.1 Project Overview 12
3.4 Requested Permits and Approvals 20
4 Environmental Impact Analysis 21
4.1 AESTHETICS 21
4.2 AGRICULTURE AND FORESTRY RESOURCES 29
4.3 AIR QUALITY 32
4.4 BIOLOGICAL RESOURCES 47
4.5 CULTURAL RESOURCES 53
4.6 ENERGY 60
4.7 GEOLOGY AND SOILS 66
4.8 GREENHOUSE GAS EMISSIONS 74
4.9 HAZARDS AND HAZARDOUS MATERIALS 86
4.10 HYDROLOGY AND WATER QUALITY 97
4.11 LAND USE AND PLANNING 107
4.12 MINERAL RESOURCES 116
4.13 NOISE 118
4.14 POPULATION AND HOUSING 147
4.15 PUBLIC SERVICES 150
4.16 RECREATION 160
4.17 TRANSPORTATION 162
4.18 TRIBAL CULTURAL RESOURCES 174
4.19 UTILITIES AND SERVICE SYSTEMS 178
4.20 WILDFIRE 192
4.21 MANDATORY FINDINGS OF SIGNIFICANCE 194

Table of Tables

Table 1: Project Development Summary 12
Table 2: South Coast Air Quality Management District Significance Thresholds 36
Table 3: Project Construction Equipment 38
Table 4: Project Construction Criteria Pollutant Emissions 38
Table 5: Operational Criteria Pollutant Emissions 39
Table 6: Equipment-Specific Grading Rates 40
Table 7: Localized Significance of Construction Emissions 41
Table 8: Localized Significance of Operational Emissions 42
Table 9: Summary of Estimated Energy Use During Project Construction 61
Table 10: Summary of Estimated Energy Consumption During Project Operation 63
Table 11: Construction Greenhouse Gas Emissions 77
Table 12: Total Project Greenhouse Gas Emissions 77
Table 13: 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy Consistency 80
Table 14: Green New Deal Consistency 82
Table 15: Consistency with the Framework Element 109
Table 16: Consistency with the Health and Wellness Element 112
Table 17: Consistency with the Wilshire Community Plan 113
Table 18: Existing Noise Measurement Locations and Measurements 119
Table 19: Sensitive Receptors 119
Table 20: Project Construction Equipment Noise Levels 123
Table 21: Project Construction Noise Levels 124
Table 22: Mechanical Equipment Noise Levels 127
Table 23: Transformer Noise Levels 128
Table 24: Storage Loading and Unloading Noise Levels 130
Table 25: Parking Lot Noise Levels 132
Table 26: Composite On-Site Noise Levels 134
Table 27: Existing and Existing Plus Project Traffic Noise Levels 136
Table 28: Construction Vibration - Unmitigated 138
Table 29: Construction Vibration – Mitigated 140
Table 30: Cumulative Plus Project Buildout Conditions Traffic Noise Levels 144
Table 31: LAFD Fire Stations Located in the Vicinity of the Project Site 151
Table 32: LADOT VMT Impact Criteria (15% Below APC Average) 164
Table 33: VMT Analysis Summary 165
Table 34: Estimated Water Demand For The Project 179
Table 35: Estimated Wastewater For The Project 182
Table 36: Estimated Project Waste Generation 187
Table 37: Related Projects List 196

Table of Figures

Figure 1: Regional Vicinity Map 10
Figure 2: Local Vicinity Map 11
Figure 3: Project Site Plan 13
Figure 4: Project Renderings 14
Figure 5: East and South Elevations 15
Figure 6: West and North Elevations 16
Figure 7: Landscape Plan 17
Figure 8: Potential Historical Resources in the Vicinity of the Project Site 55
Figure 9: Related Projects 198

Appendices

Appendix A: Air Quality Report
Appendix B: Tree Report
Appendix C: Historic and Cultural Reports
Appendix D: Energy Consumption Report and Worksheets
Appendix E: Geotechnical Report
Appendix F: Greenhouse Gas Report
Appendix G: Phase I ESA and Phase II Report
Appendix H: Hydrology Report
Appendix I: Noise Report
Appendix J: Transportation Assessment
Appendix K: Utilities Report
Appendix L: Tribal Report

1 INTRODUCTION

An application for the proposed 525 South Virgil Avenue Project (Project) has been submitted to the City of Los Angeles (City) Department of City Planning for discretionary review. The City, as Lead Agency, has determined the Project is subject to the California Environmental Quality Act (CEQA) and that the preparation of an Initial Study is required. This Initial Study evaluates the potential environmental effects that could result from the construction, implementation, and operation of the proposed Project. This Initial Study has been prepared in accordance with CEQA (Public Resources Code [PRC] Section 21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations [CCR] Section 15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended 2006). The City uses Appendix G of the State CEQA Guidelines as the thresholds of significance unless another threshold of significance is expressly identified in the document. This Initial Study is intended as an informational document, which is ultimately required to be considered and certified by the decision-making body of the City prior to approval of the Project.

1.1 PURPOSE AND SCOPE OF THE INITIAL STUDY

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

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

An Initial Study is a preliminary analysis conducted by the Lead Agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment (CEQA Guideline § 15063(a)). If the Initial Study concludes that the Project, with mitigation, may have a significant effect on the environment, an Environmental Impact Report should be prepared; otherwise, the Lead Agency may adopt a Negative Declaration or a Mitigated Negative Declaration (CEQA Guideline § 15063(b)).

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

1.2 REPORT ORGANIZATION

This document has been organized into the following sections:

[1] The Governor's Office of Planning and Research, CEQA 101, https://lci.ca.gov/ceqa/docs/20210809-CEQA_101.pdf. Accessed December 18, 2025.

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

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

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

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

1.3 CEQA PROCESS

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

2 EXECUTIVE SUMMARY

PROJECT TITLE	525 South Virgil Avenue Project
ENVIRONMENTAL CASE NO.	ENV-2025-5715-MND
RELATED CASES	CPC-2025-5714-GPA-ZC-CU2-PR
PROJECT LOCATION	515-531 South Virgil Avenue and 518-526 South Westmoreland Avenue, Los Angeles, CA 90020
COMMUNITY PLAN AREA	Wilshire Community Plan
CURRENT GENERAL PLAN DESIGNATION	Community Commercial
CURRENT ZONING	CR-1 and R4P-1
PROPOSED GENERAL PLAN DESIGNATION	Regional Commercial
PROPOSED ZONING	C2-2
COUNCIL DISTRICT	10
LEAD AGENCY	**City of Los Angeles**
CITY DEPARTMENT	Planning Department
STAFF CONTACT	Ryan Ly
ADDRESS	200 N. Spring Street, Room 621
PHONE NUMBER	(213) 978-1478
EMAIL	Ryan.Ly@lacity.org
APPLICANT	Shatto Emet QOZB LP
ADDRESS	2219 Main Street, Suite 260, Santa Monica, CA 90405

Environmental Factors Potentially Affected

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

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

DETERMINATION:

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

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

CERTIFICATION:

Ryan Ly	City Planning Associate
PRINTED NAME	**TITLE**
Ryan Ly	9/11/2026
SIGNATURE	**DATE**

Evaluation of Environmental Impacts:[2]

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

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

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

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

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

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

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

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

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

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

2 State CEQA Guidelines, Appendix G: Environmental Checklist Form.

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

9) The explanation of each issue should identify:

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

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

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The Project would demolish the existing 56,072 sf vacant office four-story building and its associated parking lot and construct an approximately 252,873 sf, eight-story self-storage building and ground-level parking. The new building would be approximately 90 feet, 11 inches tall. Self-storage uses would be located on the first through eighth floors. The ground floor would also contain an office, a lobby, restrooms, elevators, a transformer yard, and 50 bicycle parking spaces (25 short-term and 25 long-term). A street-level display window on Virgil Avenue showcasing products available for purchase would also be located on the ground floor of the Project. Also located on the ground floor would be approximately 24 covered automobile stalls, including two Americans with Disabilities Act (ADA) compliant stalls and three electric vehicle (EV) parking stalls. The Project would also include some drought-tolerant landscaping as well as multiple large murals. The Project would have an FAR of approximately 6.0.

Vehicular access to the Project Site is currently provided by one driveway on Westmoreland Avenue. The Project proposes to reconstruct and slightly shift the existing driveway on Westmoreland Avenue and to construct a new driveway on Virgil Avenue. Additionally, all loading, unloading, and refuse areas will be within the covered parking garage.

Development of the Project would require the export of approximately 5,600 cubic yards (cy) of soil, (7,280 cy with a 30-percent swell factor applied). For the purposes of this analysis, the Project's construction schedule is assumed to be approximately 18 months, with construction beginning in the second quarter of 2027 and ending in the fourth quarter of 2028. The Project is anticipated to be operational in 2028.

3.2 ENVIRONMENTAL SETTING

The 525 South Virgil Avenue Project (Project) is located at 515-531 South Virgil Avenue and 518-526 South Westmoreland Avenue (Project Site) in the Koreatown neighborhood within the City of Los Angeles (City). The Project Site is comprised of one parcel (Assessor Parcel Number [APN] 5077-004-030) on an approximately 42,146 square foot (sf) (0.97 acre) lot.

The Project proposes the demolition of the existing approximately 56,072 sf vacant four-story office building and associated surface parking lot and would develop an approximately 252,873 sf, eight-story self-storage facility. The Project would be approximately 90 feet, 11 inches tall and would provide self-storage of varying sizes. The ground floor of the Project would contain an office, lobby, restrooms, and 25 long-term and 25 short-term bicycle parking. The ground floor would also provide a street-level display window on Virgil Avenue, displaying products that the public are able to purchase on site, such as packing boxes. The remainder of the ground floor would consist of storage units. The ground floor would also include 24 covered automobile parking spaces as well as landscaped areas. The second through eighth floors of the Project would contain self-storage units. The Project would have a floor area ratio (FAR) of approximately 6.0.

The Project would be accessible from both South Virgil Avenue and Westmoreland Avenue. Driveways on South Virgil Avenue and Westmoreland Avenue would provide both ingress to and egress from the Project Site.

3.2.1 Project Location

The Project Site is located within the Koreatown neighborhood. The Project is currently developed with a vacant, approximately 56,072 sf, four-story commercial building constructed in 1965, a surface parking lot, and metal fencing along the perimeter of the Project Site. The Project Site is bordered by adjacent office/medical, commercial, and residential development to the north, Virgil Avenue to the east, commercial development, including a Carl's Jr. restaurant, to the south, and Westmoreland Avenue and residential development to the west. Directly north of the Project Site is a residential apartment building and a medical office building. East of the Project Site across South Virgil Avenue is a surface parking lot, pharmacy, food bank, and medical clinic. South of the Project Site is a surface parking lot, restaurants, auto body shop, and a hair salon. Directly to the west of the Project Site across Westmoreland Avenue is a church, multi-family housing, and associated surface parking. Please refer to **Figure 1:** Regional Vicinity Map and **Figure 2**: Local Vicinity Map.

Regional vehicle access to the Project Site is provided by the U.S. 101 (US 101 Freeway) located 0.9 miles to the north of the Project Site, California State Route 110 (I-110) Freeway located 1.74 miles to the southeast of the Project Site, and California State Route 10 (I-10) located 1.87 miles south of the Project Site. Local vehicle access to the Project Site is provided via 5th Street to the north, Virgil Avenue to the east, 6th Street to the south, and Westmoreland Avenue to the west. The Project Site is in proximity to several transit options. Numerous Metro transit and Los Angeles Department of Transportation (LADOT) transit bus lines run and stop in the greater vicinity of the Project, including Metro Lines 18, 20, and 204 and the LADOT Wilshire Center/Koreatown Clockwise and Counterclockwise Line. Los Angeles Metro Bus Route 18 is located approximately 310 feet southwest of the Project Site and runs east to west on 6th Street. LA Metro Bus Route 20 is located approximately 962 feet south of the Project Site and runs east to west on Wilshire Boulevard. LA Metro Bus Route 204 and LADOT Wilshire Center/Koreatown Clockwise and Counterclockwise Bus Route are located approximately 0.3 miles west of the Project Site and run north to south along Vermont Avenue. The Project Site is located approximately 0.25 miles northeast of the Wilshire and Vermont Metro Station, which serves the B Line (formally the Red line) and the D Line (formally the Purple Line). Additionally, the Project Site is approximately 0.8 miles northeast of the Wilshire and Normandie Station, which serves the D line (formally the Purple line).

3.2.2 Existing Conditions

The Project Site is currently developed with an approximately 56,072 sf, vacant four-story office building, a surface parking lot, and metal fencing. Vehicular access to the Project Site is currently provided by one driveway on Westmoreland Avenue. Adjacent to the Project Site, 12-foot-wide sidewalks are provided along Virgil Avenue and 15-foot-wide sidewalks are provided along Westmoreland Avenue.

There are no trees located on the Project Site. Four Indian Laurel street trees (*Ficus Nitida*) are located adjacent to the Project Site along South Virgil Avenue in small sidewalk cutouts. There are no street trees located on Westmoreland Avenue. The Project proposes the removal of the two northern street trees on South Virgil Avenue and the retention of the two southern street trees on South Virgil Avenue. Per the

tree survey prepared for the Project (**Appendix B**), the street trees are not protected trees listed in the City's Preservation of Protected Trees Ordinance No. 186873.[3]

3.2.3 General Plan and Zoning

The Project Site is located within the Wilshire Community Plan (last updated in 2001) and has a Land Use designation of Community Commercial. The eastern portion of the Project Site is zoned Limited Commercial, CR-1, which allows a height of 75 feet.[4] The western portion of the Project Site is zoned Multiple Dwelling Zone, R4P-1, which does not include a height restriction.[5]

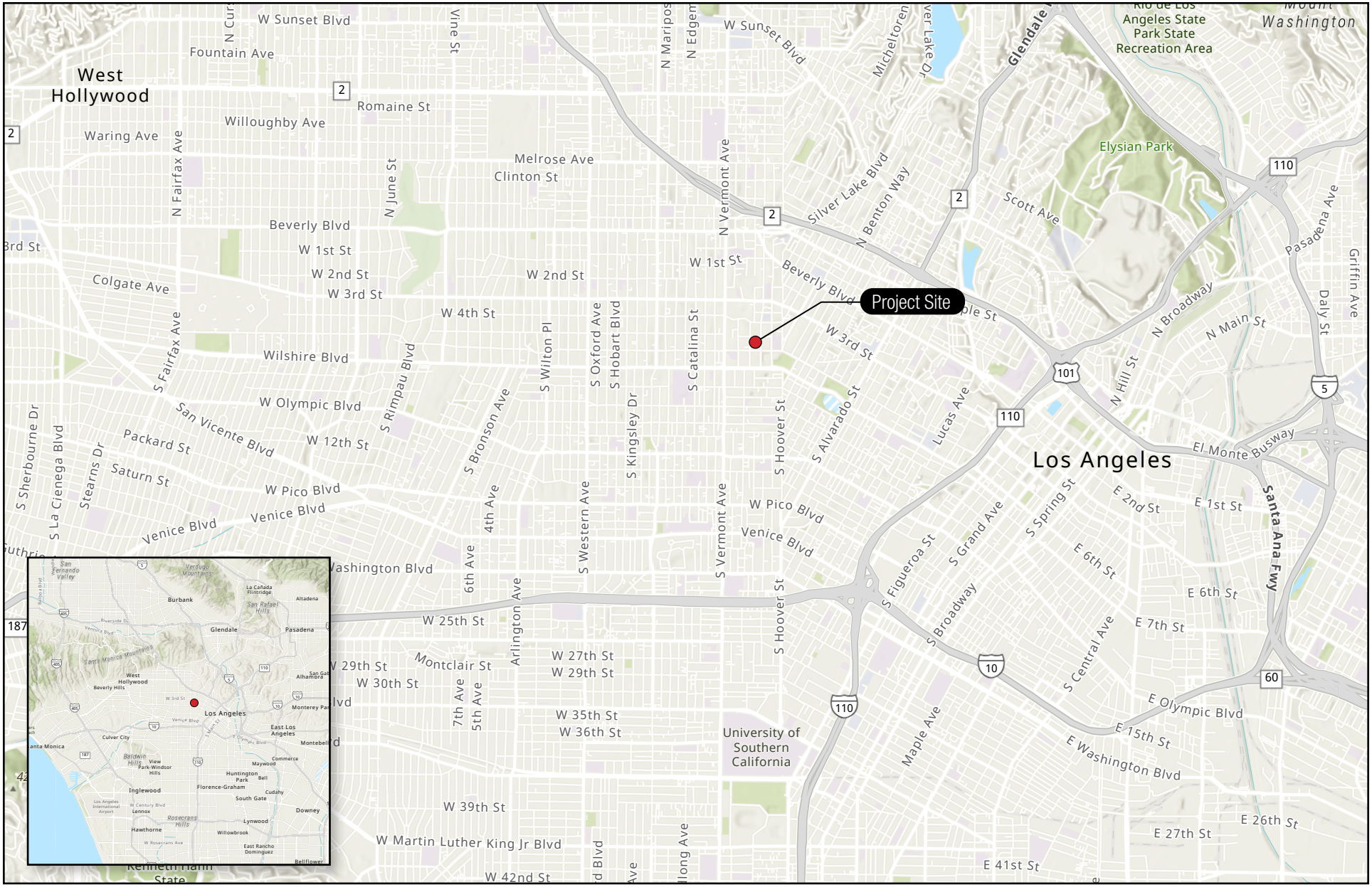
As part of the Project approval, the Project proposes to change the Project Site's land use designation to Regional Commercial and to re-zone the Project Site entirely to Commercial Zone, C2-2. Storage buildings for household goods are permitted in the C2 zone with the approval of a Conditional Use Permit (CUP) under Los Angeles Municipal Code (LAMC) Section 12.24.W.50.[6]

[3] Arborgate Consulting, Inc., City of Los Angeles Street Tree Elevation 525 South Virgil Ave, Prepared August 20, 2025.

[4] City of Los Angeles Municipal Code Section 12.21.1. Height of Buildings or Structures, https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-6325. Accessed December 18, 2025.

[5] See City of Los Angeles Municipal Code Section 12.21.1. Height of Buildings or Structures, https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-6325. Accessed December 18, 2025.

[6] City of Los Angeles Municipal Code Section 12.24. Conditional Use Permits and Other Similar Quasi-Judicial Approvals, https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-115396. Accessed December 18, 2025.

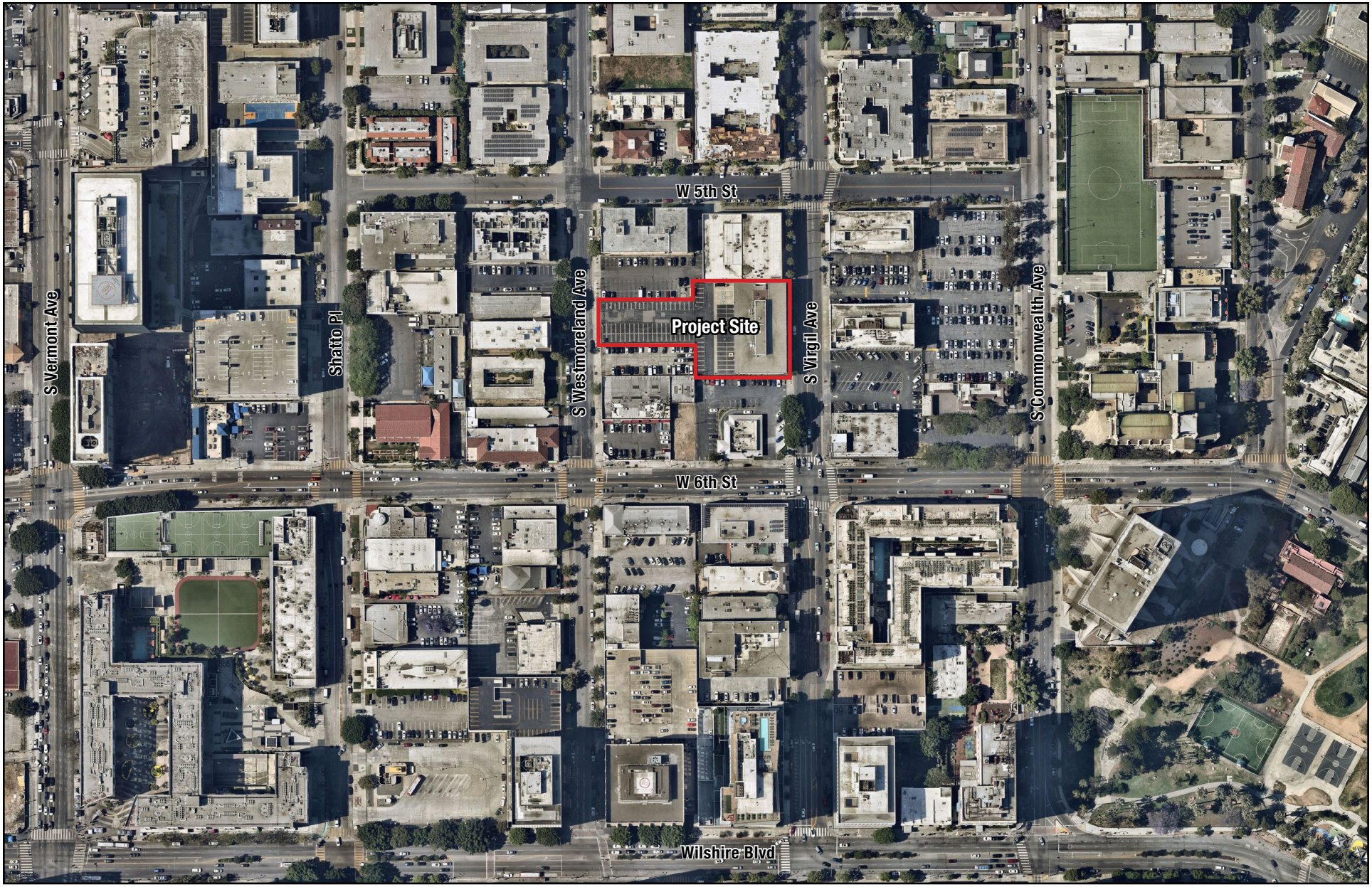


SOURCE: ArcGIS Pro, 2025

FIGURE 1: Regional Vicinity Map

525 SOUTH VIRGIL AVENUE PROJECT

Kimley»Horn



SOURCE: Nearmap, 2025

FIGURE 2: Local Vicinity Map

525 SOUTH VIRGIL AVENUE PROJECT

Kimley»Horn

3.3 DESCRIPTION OF THE PROJECT

3.3.1 Project Overview

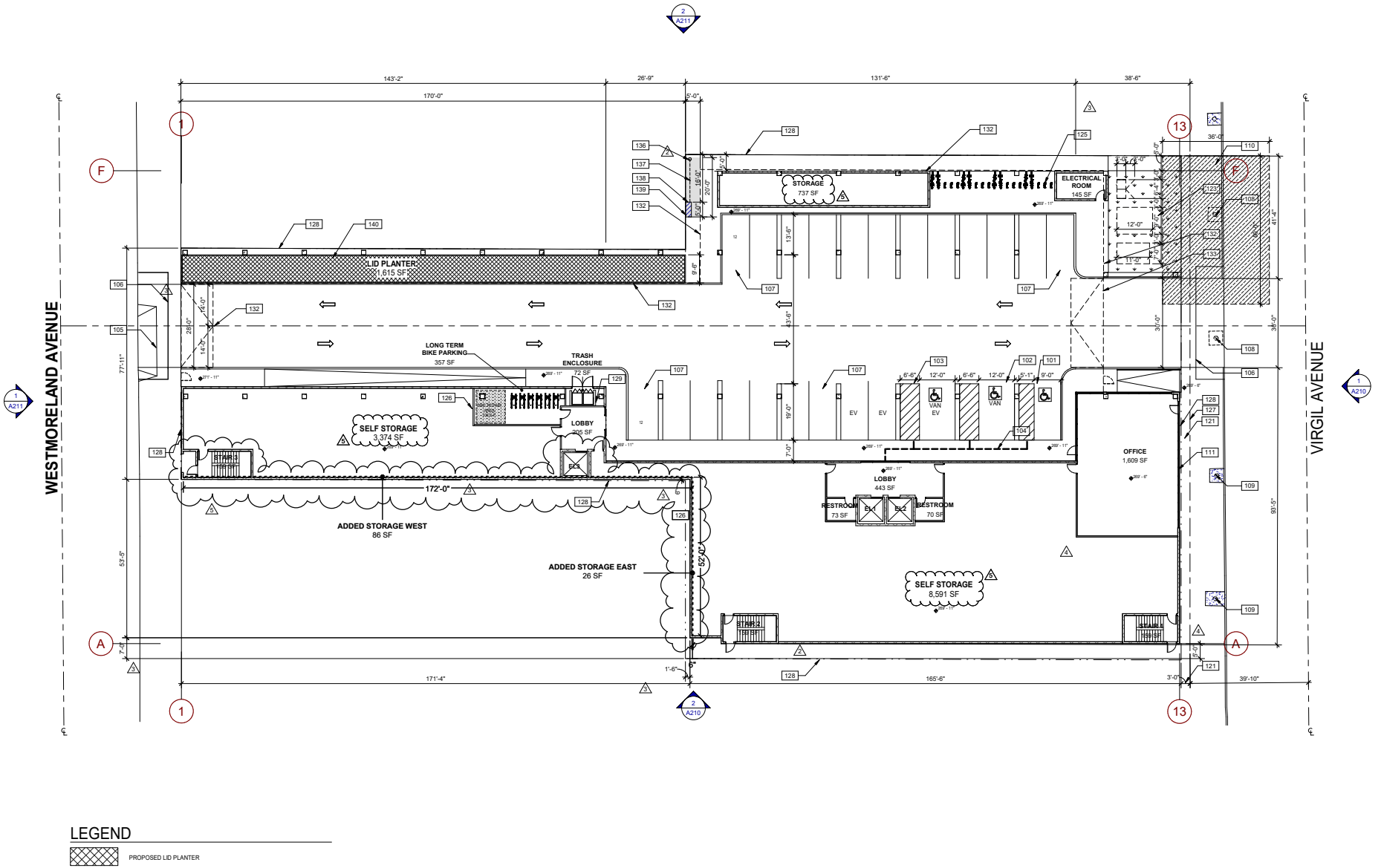
The Project would demolish the existing 56,072 sf vacant four-story office building and its associated parking lot and construct an approximately 252,873 sf, eight-story self-storage building with ground-level parking. The new building would be approximately 90 feet, 11 inches tall.

As described in **Table 1: Project Development Summary**, self-storage uses would be located on the first through eighth floors. The ground floor would also contain an office, a lobby, restrooms, elevators, a transformer yard, and 50 bicycle parking spaces (25 short-term and 25 long-term). A street-level display window on Virgil Avenue showcasing products available for purchase would be located on the ground floor of the Project. Also located on the ground floor would be approximately 24 automobile stalls, including two Americans with Disabilities Act (ADA) compliant stalls and three electric vehicle (EV) parking stalls. The Project would also include some drought-tolerant landscaping as well as multiple large murals. The Project would have an FAR of approximately 6.0.

Table 1: Project Development Summary

Project Component	Proposed Development	
First Floor	Storage uses , office, lobby, restrooms	15,214 sf (including a lobby, office and storage uses)
Second Floor	Storage uses	12,827 sf
Third Floor	Storage uses	37,472 sf
Fourth Floor	Storage uses	37,472 sf
Fifth Floor	Storage uses	37,472 sf
Sixth Floor	Storage uses	37,472 sf
Seventh Floor	Storage uses	37,472 sf
Eighth Floor	Storage uses	37,472 sf
Total	**252,873 sf**	
Height	90 feet -11 inches	
Stories	8	
Source: Ware Malcomb, August 20, 2025		

Please refer to **Figure 3, Project Site Plan, Figure 4, Project Renderings, Figure 5, East and South Elevation, Figure 6, West and North Elevation,** and **Figure 7, Landscape Plan**, which depict the proposed site plan, renderings, and elevations.



SOURCE: Ware Malcomb, 2026

FIGURE 3: Project Site Plan

525 SOUTH VIRGIL AVENUE PROJECT

Kimley»Horn



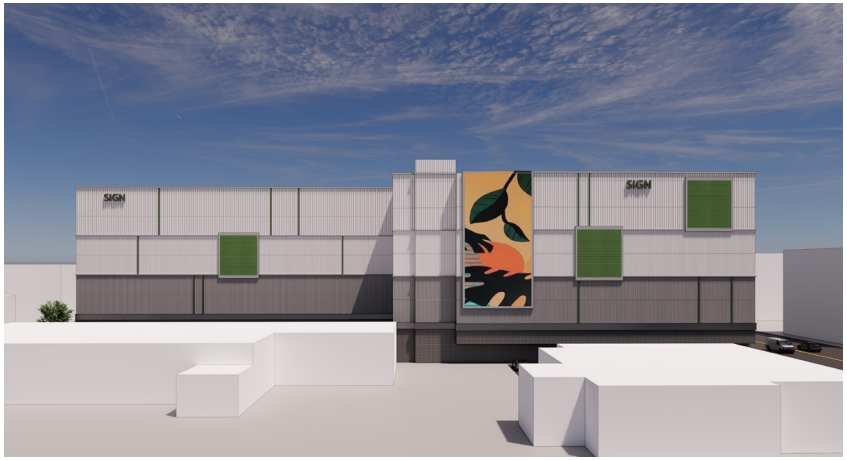
VIEW FROM NORTHEAST

East Exterior Rendering



BIRD'S EYE VIEW FROM SOUTHWEST

Southeast Exterior Rendering



BIRD'S EYE VIEW FROM SOUTH

South Exterior Rendering



VIEW FROM NORTHWEST

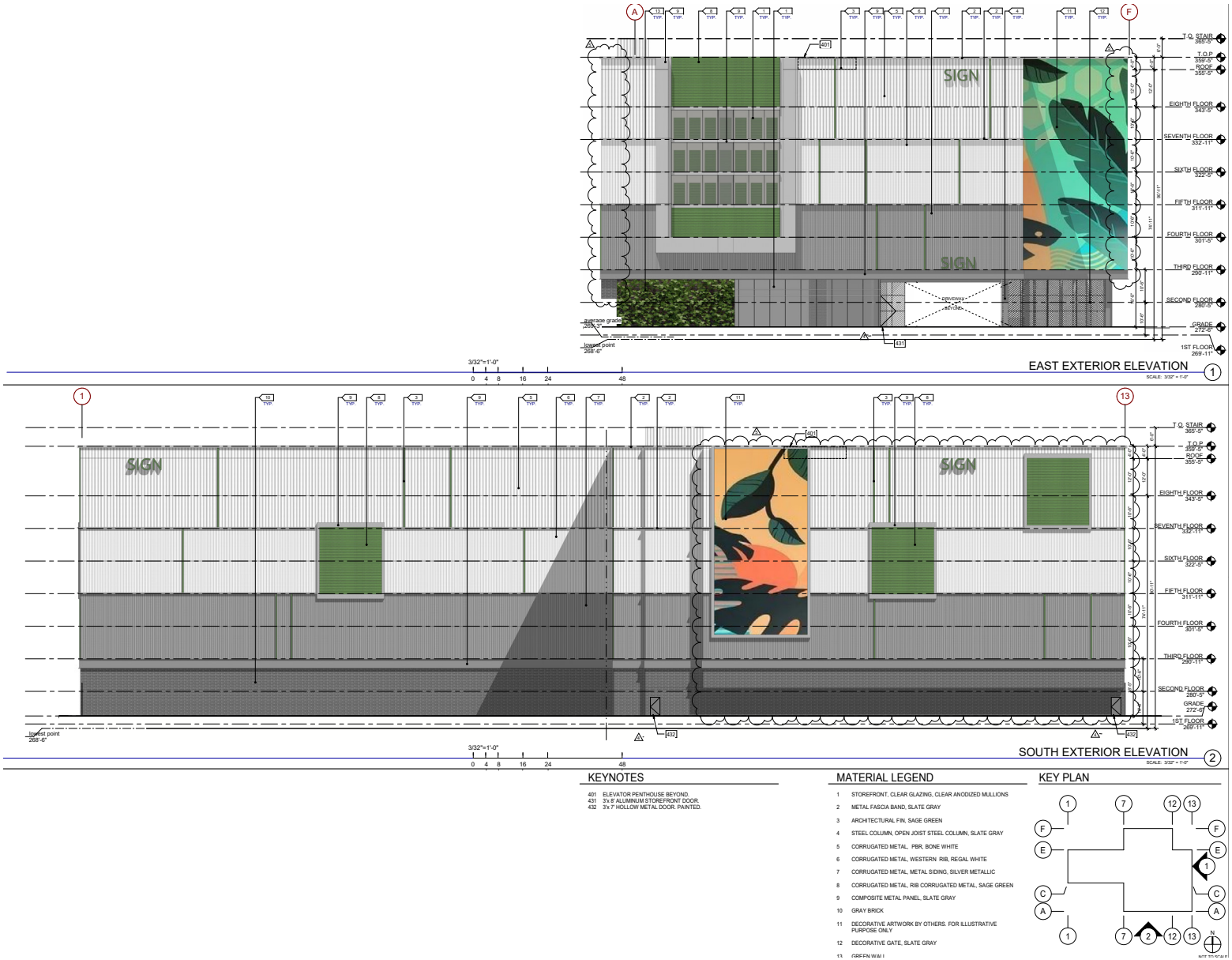
West Exterior Rendering

SOURCE: Ware Malcomb, 2026

FIGURE 4: Project Renderings

525 SOUTH VIRGIL AVENUE PROJECT

Kimley»Horn

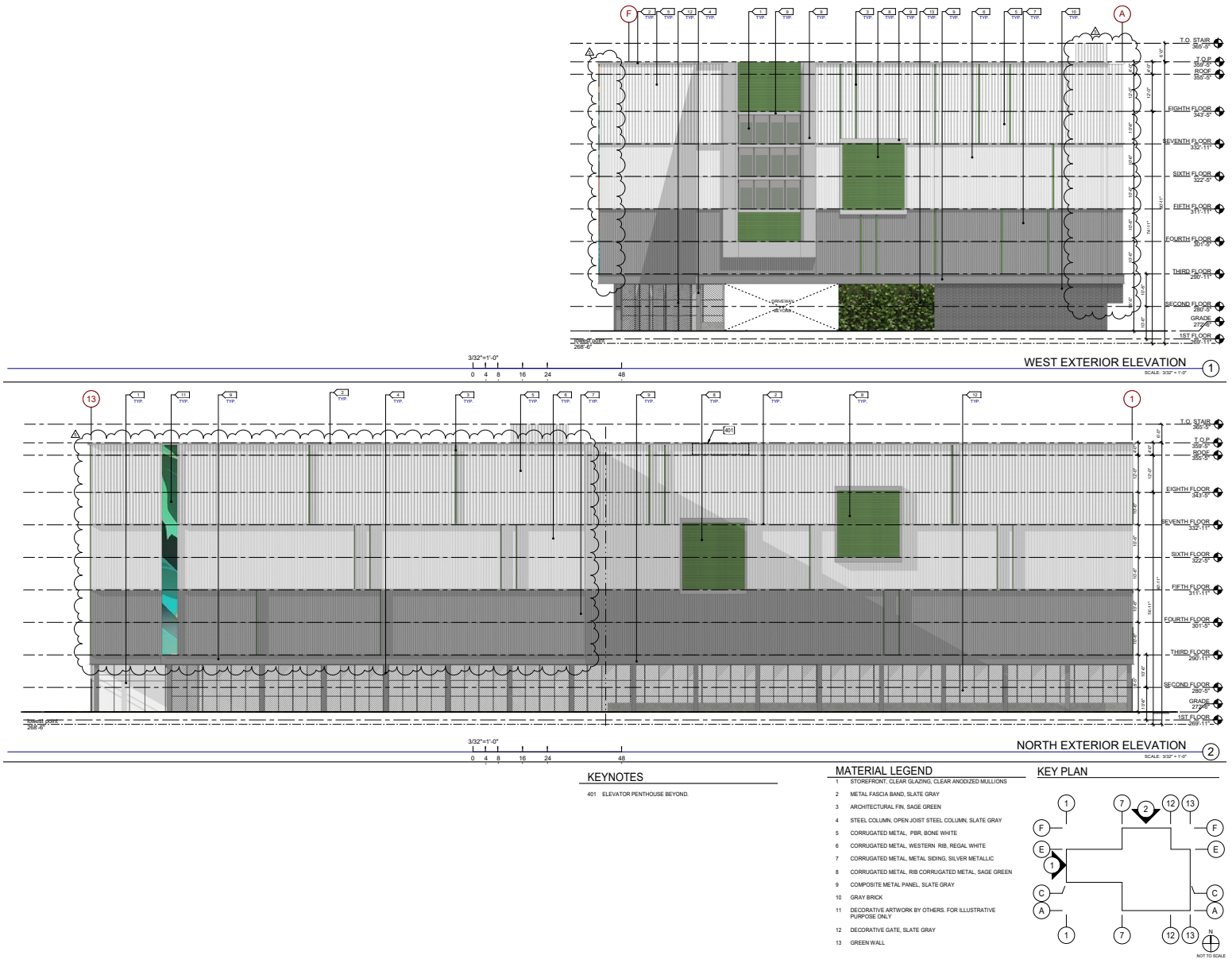


SOURCE: Ware Malcomb, 2026

FIGURE 5: East and South Elevation

525 SOUTH VIRGIL AVENUE PROJECT

Kimley»Horn

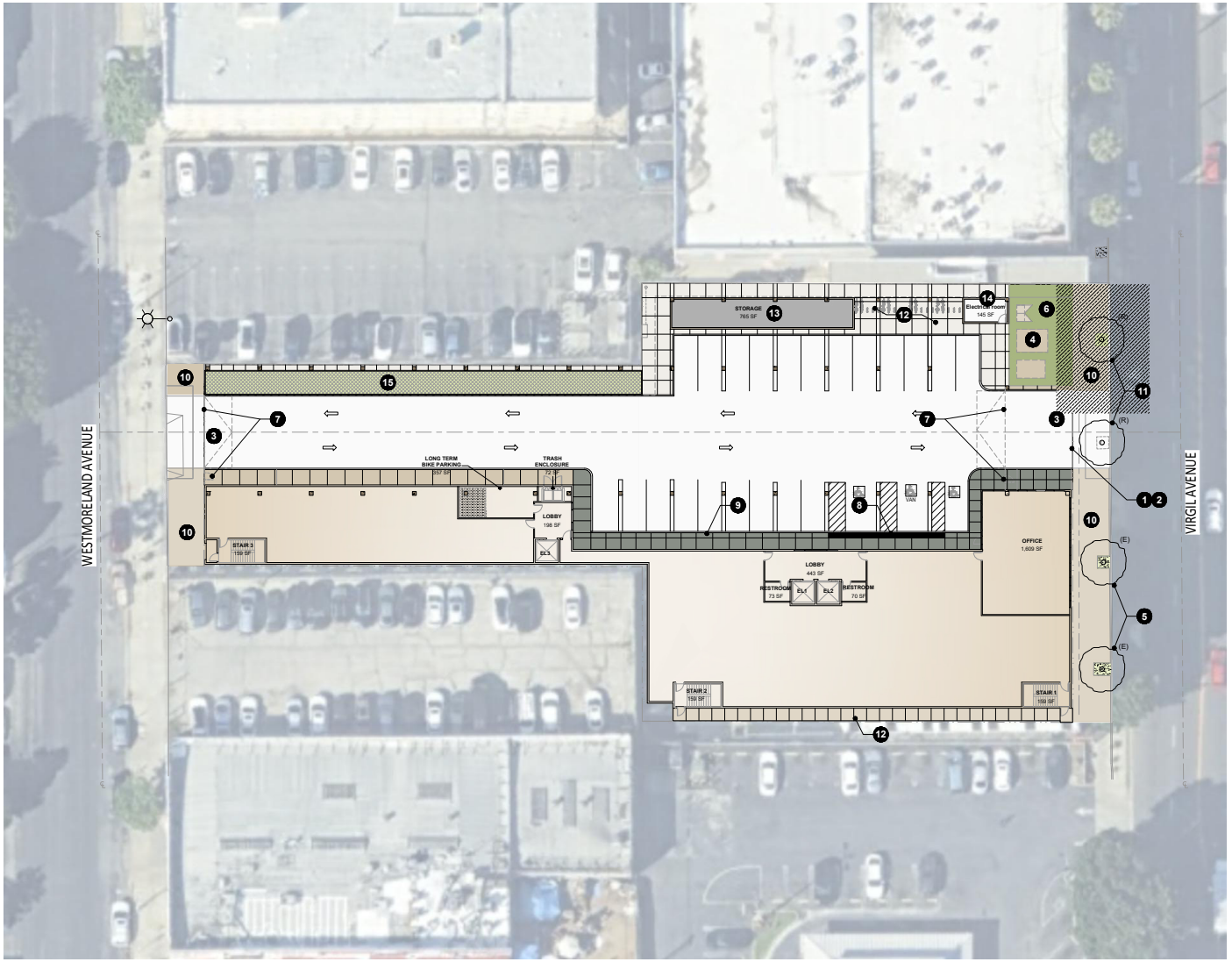


SOURCE: Ware Malcomb, 2026

FIGURE 6: West and North Elevation

525 SOUTH VIRGIL AVENUE PROJECT

Kimley»Horn



EXISTING PLANT SCHEDULE

TREES

SYMBOL	BOTANICAL NAME	COMMON NAME	COMMENTS
	FICUS NITIDA	LAUREL FIG	--

NOTE: THE LETTER (E) NEXT TO A TREE SYMBOL INDICATES AN EXISTING TREE TO BE PROTECTED IN PLACE. THE LETTER (R) INDICATES AN EXISTING TREE TO BE REMOVED FROM SITE.

PROPOSED PLANT PALETTE

SHRUBS, GRASSES, & GROUNDCOVERS

SYMBOL	BOTANICAL NAME	COMMON NAME	SIZE	SPACING	WATER USE	DESCRIPTION
	AEONIUM 'JACK CATLIN'	AEONIUM 'JACK CATLIN'	5 GAL.	24" O.C.	L	SHADE TOLERANT
	AGAVE 'BLUE FLAME'	BLUE FLAME AGAVE	5 GAL.	36" O.C.	VL	SUCCULENT ACCENT
	ALOE 'BLUE ELF'	BLUE ELF ALOE	1 GAL.	18" O.C.	VL	SMALL SUCCULENT
	ALOE STRIATA	CORAL ALOE	1 GAL.	24" O.C.	L	SUCCULENT ACCENT
	ALOE VERA	MEDICINAL ALOE	5 GAL.	30" O.C.	L	SUCCULENT ACCENT
	AZALEA 'RED BIRD'	RED BIRD AZALEA	1 GAL.	24" O.C.	H	SHADE TOLERANT
	BOUGAINVILLEA 'LA JOLLA'	RED BOUGAINVILLEA	5 GAL.	36" O.C.	L	FLOWERING SHRUB
	CALANDRINIA SPECTABILIS	ROCK PURSLANE	1 GAL.	24" O.C.	L	FLOWERING SUCCULENT
	CAREX DIVULSA	BERKELEY SEDGE	1 GAL.	24" O.C.	L	ORNAMENTAL GRASS
	CARISSA M. 'GREEN CARPET'	DWARF NATAL PLUM	5 GAL.	30" O.C.	M	EVERGREEN LOW SHRUB
	DIANELLA 'CASSA BLUE'	CASSA BLUE FLAX LILY	1 GAL.	24" O.C.	M	SMALL UPRIGHT ACCENT
	DIANELLA T. 'VARIEGATA'	VARIEGATED FLAX LILY	5 GAL.	36" O.C.	M	UPRIGHT ACCENT
	FRAGRARIA CALIFORNICA	CALIFORNIA STRAWBERRY	1 GAL.	24" O.C.	L	SHADE TOLERANT
	JUNCUS PATENS	CALIFORNIA GRAY RUSH	1 GAL.	18" O.C.	L	BIOSWALE GRASS
	LANTANA 'NEW GOLD'	NEW GOLD LANTANA	5 GAL.	36" O.C.	L	FLOWERING GROUNDCOVER
	LAVANDULA ANGUSTIFOLIA	ENGLISH LAVENDER	5 GAL.	36" O.C.	L	FLOWERING SHRUB
	LOMANDRA LONGIFOLIA 'BREEZE'	DWARF MAT RUSH	1 GAL.	36" O.C.	M	ORNAMENTAL GRASS
	MUHLENBERGIA C. 'REGAL MIST'	PINK MUHLY	1 GAL.	36" O.C.	L	ORNAMENTAL GRASS
	OLEA EUROPAEA 'MONTRA'	LITTLE OLLIE	5 GAL.	36" O.C.	L	LARGE SCREENING SHRUB
	ROSMARINUS O. 'PROSTRATUS'	PROSTRATE ROSEMARY	1 GAL.	36" O.C.	L	EVERGREEN GROUNDCOVER
	SANSEVERIA TRIFASCIATA	SNAKE PLANT	5 GAL.	24" O.C.	L	SHADE TOLERANT
	WESTRINGIA 'WYNYABBIE GEM'	COAST ROSEMARY	1 GAL.	48" O.C.	L	LARGE SHRUB

WATER USE KEY:
VL = VERY LOW WATER USE, L = LOW WATER USE, M = MODERATE WATER USE, H = HIGH WATER USE. WATER USE STATED IS PER 'WATER USE CLASSIFICATION OF LANDSCAPE SPECIES' (ALSO REFERRED TO AS WUCOLS IV) FOR THE COUNTY OF LOS ANGELES, CA.

LEGEND

1. PROPERTY LINE
2. RIGHT-OF WAY
3. VEHICULAR ENTRANCE / EXIT
4. TRANSFORMER
5. EXISTING TREES TO BE PROTECTED
6. DROUGHT TOLERANT LANDSCAPE
7. VEHICULAR & PEDESTRIAN GATE
8. TRUNCATED DOMES
9. ENHANCED CONCRETE AT OFFICE AND LOBBY
10. EXISTING WALKWAY
11. EXISTING TREES TO BE REMOVED
12. NATURAL GRAY CONCRETE
13. STORAGE
14. ELECTRICAL ROOM
15. LID TREATMENT

SOURCE: Ware Malcomb, 2026

FIGURE 7: Preliminary Landscape Plan

525 SOUTH VIRGIL AVENUE PROJECT

Kimley»Horn

Design and Architecture

The building is designed to be compatible in size and mass with surrounding land uses. The building facades would include variations of white, gray, and green metal panels. The new building would be designed with a modern architectural style that features a flat roof, a storefront with glazing, architectural finishes and louvers, steel beams, and metal panels.

The Project features white and light gray vertical metal cladding with pops of vertical green stripes and squares. The west and east facades of the building will feature large decorative glass windows showcasing vibrant green doors. Artistic murals would be incorporated on the east and south facades of the building. These features all add visual interest and provide architectural relief. At the street level, the building combines decorative metal panels, stonework, and landscaping to create a pedestrian oriented environment.

The Project would provide pedestrian access on Virgil Avenue east of the Project Site and on Westmoreland Avenue west of the Project Site. The building materials would include architectural fins, architectural louvres, steel beams, corrugated metal, and stonework.

Open Space and Landscaping

The Project would not include residential uses; therefore, no open space requirements would apply to the Project. There are no trees on the Project Site and four street trees (Ficus Nitida) located along Virgil Avenue. The Project proposes the removal of the two northern street trees and the retention of the two southern street trees. None of the trees are protected by the City of Los Angeles Protected Tree and Shrubs Ordinance No. 186,873. Furthermore, any removal of street trees would require a Tree Removal Permit from the City of Los Angeles Bureau of Street Services. For any removed trees, Applicant will replace the trees or pay the applicable in-lieu fees in accordance with City requirements. Additionally, the Project would include the installation of some drought-tolerant landscaping and ground floor LID trays.

Access, Circulation, and Parking

The Project would provide access for all modes of travel, including vehicles, pedestrians, and cyclists. Vehicular access to the Project Site is currently provided by one driveway on Westmoreland Avenue. The Project proposes to reconstruct and slightly shift the existing driveway on Westmoreland Avenue and to construct a new driveway on Virgil Avenue. Vehicles would have the ability to drive straight through the Project Site, adding convenient through-access for customers who may be driving larger trucks or vans. Additionally, all loading, unloading, and refuse areas will be within the covered parking garage.

Both driveways would include a vehicular and pedestrian gate that would remain open during business hours to provide entry/exit to the gated parking lot. Because Virgil Avenue is an arterial street and does not have a two-way left-turn lane in the center, left turns would be prohibited from the Virgil Avenue driveway in compliance with City requirements. The Westmoreland Avenue driveway would provide full access operation, allowing both right- and left-turn ingress and egress. The Project is located within one-half mile of a major transit stop and is therefore not required to provide parking per Assembly Bill 2097 (AB 2097). However, the Project would voluntarily provide approximately 24 covered parking spaces.

Pedestrians and bicyclists would be able to access the Project Site via existing sidewalks on Virgil Avenue and Westmoreland Avenue. Pedestrians would be able to access the Project Site using pedestrian walkways located on the ground floor entrance of Virgil Avenue and Westmoreland Avenue. The Project would provide a three-foot dedication along Virgil Avenue along the Project Site frontage. The three-foot dedication would widen the existing 12-foot-wide sidewalk along the Project Site to a 15-foot-wide sidewalk.

Lighting and Signage

The Project would install various exterior lights around the building, including interior and exterior lighting for security entrances, signage, wayfinding, architectural highlighting, and landscape/security lowlighting. Outdoor lighting would be designed and installed with shielding to ensure that the lighting would be focused on the Project Site and deflected away from adjacent land uses in accordance with LAMC lighting regulations. In addition, the proposed signage and outdoor lighting would comply with applicable regulations contained within the LAMC that limit lighting intensity or direct glare onto exterior glazed windows or glass doors on any adjacent property.

Site Security

During construction, the Project Site would be secured with perimeter fencing. During Project operations, the Project would be open seven days a week. The front office would be open to the public from approximately 9:00 am to 6:00 pm daily, where visitors can purchase supplies and other conveniences, but otherwise the storage portions of the facility would only be accessible to customers and only between the hours of approximately 6:00 am to 10:00 pm daily.

The Project would incorporate numerous safety features, including security cameras, burglar alarms, access control to the building, and bolt-cutter resistant cylinder locks. The plans for the Project would incorporate guidelines as identified in the "Design Out Crime Guidelines: Crime Prevention Through Environmental Design," published by the Los Angeles Police Department. The Project would include well-illuminated public and semi-public spaces designed with minimal dead space to eliminate areas of concealment.

Sustainability Features

The Project would comply, as applicable, with the Green Building Code, which requires the use of numerous conservation measures beyond those required by Title 24 of the California Administrative Code. The Green Building Code contains both mandatory and voluntary green building measures to conserve energy. The Project would include EV spaces, bike parking and storage, and low-flow water fixtures. The Project would utilize drought tolerant landscaping and water efficient irrigation. The Project's infill location would promote the concentration of development in an urban location with extensive infrastructure and access to public transit facilities, which would reduce vehicle miles traveled for the Project.

Anticipated Construction Schedule

Development of the Project would require the export of approximately 5,600 cubic yards (cy) of soil (7,280 with a 30-percent swell factor applied). All necessary utility improvements, including water, sewer, and

storm drain, would be constructed within the Project Site. For the purposes of this analysis, the Project's construction schedule is assumed to be approximately 18 months, with construction beginning in the second quarter of 2027 and ending in the fourth quarter of 2028. The Project is anticipated to be operational in 2028.

Construction activities would be performed in accordance with all applicable State and federal laws and City Codes and policies with respect to building construction and activities. As provided in Section 41.40 of the LAMC, the permissible hours of construction within the City are 7:00 A.M. to 9:00 P.M. Monday through Friday, and between 8:00 A.M. and 6:00 P.M. on any Saturday or national holiday. No construction activities are permitted on Sundays. Project construction will comply with LAMC Section 41.40.

3.4 REQUESTED PERMITS AND APPROVALS

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

- General Plan Amendment pursuant to LAMC Section 11.5.6 of Chapter 1 and LAMC Section 13B.1.1 of Chapter 1A to change the Project Site's land use designation from Community Commercial to Regional Commercial.
- Zone Change pursuant to LAMC Section 12.32 of Chapter 1 and LAMC Section 13B.1.4 of Chapter 1A to change the Project Site's zoning from CR-1 and R4P-1 to C2-2.
- Conditional Use Permit pursuant to LAMC Section 12.24.W.50 of Chapter 1 and LAMC Section 13B.2.2 of Chapter 1A to permit a storage building for household goods in the C2 zone.
- Project Review pursuant to LAMC Section 16.05 of Chapter 1 and LAMC Section 13B.2.4 of Chapter 1A for a Project creating more than 50,000 gross sf of non-residential floor area.

4 ENVIRONMENTAL IMPACT ANALYSIS

4.1 AESTHETICS

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

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

Less Than Significant Impact. The Project is located in the Wilshire Community Plan area within the City of Los Angeles. The City of Los Angeles' General Plan Conservation Element defines scenic vistas as the panoramic public views that provide access to natural features, including views of the ocean, striking or unusual natural terrain, or unique urban or historic resources. Public access to these views is from park lands, private and publicly owned sites and public rights-of-way.[7] Distant views of the Hollywood Hills are intermittently available looking north from locations along north-south streets near the Project Site, such as from along Virgil Avenue and Westmoreland Avenue. However, due to distance and intervening development, views of the hillsides are limited.

The Project Site is currently developed with an approximately 56,072 sf, vacant four-story office building, a surface parking lot, and metal fencing. As discussed below under Section 4.5 Cultural Resources, the existing office building is not considered a historic resource. The Project Site area is not located within a designated Hillside Area[8] and is predominantly flat. The current viewshed at the Project Site is characterized by existing urban development consisting of low- to mid-rise office, commercial, and residential uses. There are no prominent topographical features on the Project Site from which scenic

[7] Conservation Element of the City of Los Angeles General Plan, Adopted September 26, 2001, Approved March 10, 2001, https://planning.lacity.gov/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation_Element.pdf. Accessed December 18, 2025.

[8] City of Los Angeles, ZIMAS, https://zimas.lacity.org/ Accessed December 18, 2025.

vistas could be viewed. Neither the Project Site nor its immediate surroundings include any design features that would constitute a scenic resource or vista.

Near the Project Site are two potentially historical resources: the mixed-use commercial building at 3101 West 6th Street, which is located approximately 140 feet southwest of the Project Site across Westmoreland Avenue, and the multi-family residential building at 523 South Westmoreland Avenue, which is located approximately 80 feet west of the Project Site across Westmoreland Avenue. These historic buildings could be considered scenic resources. However, as discussed below under Section 4.5, *Cultural Resources*, the Project would not materially impair the adjacent historical resources and would not alter the setting such that they would no longer convey their historic significance. Furthermore, the primary views of these buildings from South Westmoreland Avenue and 6th Street would not be altered with construction of the Project and views of these structures would remain. Furthermore, the Project would not block the existing limited public views of the distant Hollywood Hills from Westmoreland Avenue or Virgil Avenue because the existing views are oriented north-south, and the Project Site is an infill location between these north-south streets.

Therefore, although the proposed Project would increase the height from an existing four-story vacant office building to an eight-story self-storage building and ground-level parking Project implementation would not obstruct any views of unique or protected scenic vistas or focal points. Therefore, impacts related to scenic vistas would be less than significant, and no mitigation measures are required.

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

No Impact. There are no designated state scenic highways on, across, or within the vicinity of the Project Site. The nearest state-designated scenic highway is a 55-mile segment of SR-2 (Angeles Crest Highway) located over 12 miles to the northeast of the Project Site. In addition, the nearest highways eligible for designation as state scenic highways are SR 187 located over 11 miles to the southwest of the Project Site and I-210 (Foothill Freeway) located over 10 miles to the northeast of the Project Site.[9] Further, as stated above, the Project Site is located in an area that is highly urbanized and is currently fully developed with a building and surface parking. As such, the Project would not substantially damage scenic resources within a state scenic highway or on the Project Site. Therefore, impacts would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact. The Project Site is located in an urbanized area[10] of the City, so the applicable threshold is whether the Project is consistent with applicable zoning and other regulations governing scenic quality. As discussed below, the Project is consistent with the City's General Plan, the LAMC, and

[9] California Department of Transportation (Caltrans), California Scenic Highways, https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways. Accessed November 11, 2025.

[10] Per PRC Section 21071, an "urbanized area" includes an incorporated city with a population of at least 100,000 persons. Los Angeles is an incorporated city with a population well over 100,000.

the Citywide Design Guidelines. The Project Site is not located within the boundaries of or subject to any Specific Plan or Community Design Overlay.

General Plan and Zoning Consistency

The Project Site is within the Wilshire Community Plan Area within the City and has a General Plan land use designation of Community Commercial. The eastern portion of the Project Site is zoned Limited Commercial, CR-1, which allows a height of 75 feet.[11] The western portion of the Project Site is zoned Multiple Dwelling Zone, R4P-1, which does not include a height restriction.[12]

As part of the Project approval, the Project proposes to change the Project Site's land use designation to Regional Commercial and to re-zone the Project Site entirely to Commercial Zone, C2-2. Storage buildings for household goods are permitted in the C2 zone with the approval of a CUP under LAMC Section 12.24.W.50.[13] The Project also complies with all other applicable requirements of the zoning code, such as height, setbacks, floor area ratio, bicycle and vehicular parking, and access and circulation.

The General Plan Amendment to Regional Commercial and Zone Change to Commercial Zone, C2-2 would help facilitate the development of the new self-storage uses to serve the needs of the City's existing and future residents, particularly residents in small apartments that have limited storage within their units. The Project will be visually compatible with surrounding current and future development and will accommodate a combination of uses that support the needs of the City's existing and future residents and businesses.

Citywide Design Guidelines Consistency

The Citywide Design Guidelines apply to all new development and substantial building alterations that seek a discretionary action for which the Department of City Planning has design authority. While not all projects seeking entitlements from the City will be required to demonstrate their alignment with the design approaches, all projects - even by-right projects – are encouraged to consider how their project design and building performance can be enhanced by incorporating the intent of the Guidelines into their project design.[14] The Citywide Design Guidelines were established to carry out common design objectives that maintain neighborhood form and character while promoting design excellence and innovative development solutions. The Citywide Design Guidelines are not intended to supersede the LAMC and/or other regulatory documents such as specific plans and overlays, which may contain design guidelines that better address the specific needs of different geographic areas and communities.

In October 2019, the City Planning Commission adopted a new set of Citywide Design Guidelines that consolidate the guidelines for three project types into a single document in order to establish a more efficient and effective design review process. The new set includes adopted City policies and up-to-date design solutions that were not previously considered, plus input from various City departments including

[11] City of Los Angeles Municipal Code Section 12.21.1. Height of Buildings or Structures, https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-6325. Accessed December 18, 2025.

[12] See City of Los Angeles Municipal Code Section 12.21.1. Height of Buildings or Structures, https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-6325. Accessed December 18, 2025.

[13] City of Los Angeles Municipal Code (LMC) Section 12.24. Conditional Use Permits and Other Similar Quasi-Judicial Approvals, https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-115396. Accessed December 18, 2025.

[14] Citywide Design Guidelines, Adopted October 24, 2019. https://planning.lacity.gov/odocument/f6608be7-d5fe-4187-bea6-20618eec5049/Citywide_Design_Guidelines.pdf, Accessed December 18, 2025.

the Department of Building and Safety, Bureau of Engineering, Cultural Affairs, and the Mayor's Sustainability and Resiliency teams.[15] The Project's consistency with each guideline is discussed below.

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

The Project would encourage pedestrian circulation at the street level in part through the orientation of the proposed new building and its incorporation of artistic murals and new landscaping. The Project would also provide adequate lighting for security and wayfinding purposes. Moreover, the Project will provide a 3-foot dedication along Virgil Avenue, which will allow for wider sidewalks. These Project elements would promote a safe, comfortable, and accessible pedestrian experience for all visitors.

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

The Project would provide access for all modes of travel, including pedestrians and cyclists. The Project would encourage pedestrian circulation at the street level in part through the orientation of the proposed new building and its incorporation of artistic murals and new landscaping. The vehicular entrances on Virgil Avenue and Westmoreland Avenue are located at the center of the Project site and away from any city block intersections, and the Project includes ADA-compliant pathways from the public realm into the Project.

Additionally, the Project is located in a transit-rich area with numerous Metro transit and LADOT transit bus lines that run and stop in the greater vicinity of the Project. The Project would also help connect Project employees and visitors to the surrounding neighborhood, thereby improving the pedestrian experience and providing convenient access to transit.

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

The Project would be designed to help activate the street and encourage pedestrian activity. The building facades would include variations of white, gray, and green metal panels to add visual interest and reduce massing and scale. Artistic murals would be incorporated on the east and south facades of the building. These features all add visual interest and provide architectural relief. The west and east facades of the building will feature large decorative glass windows showcasing vibrant green doors and would provide visual transparency into the Project at the street level.

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

The Project would be complementary to the local area context, the relationships with adjacent buildings, and the quality and functionality of the urban fabric. The building is designed with a modern architectural style that features broken-up massing, storefront windows, and artistic murals, and would also include new landscaping to enhance the pedestrian-oriented streetscape. At the street level, the building combines decorative metal panels, stonework, and landscaping to create a pedestrian oriented environment. The massing of the building is consistent with the urban fabric of existing development surrounding the Project.

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

Guideline 5: Express a clear and coherent architectural idea

The Project would express a clear and coherent architectural idea. The Project would be designed to be compatible in size and massing with surrounding land uses. The new building's facades would include variations of white, gray, and green metal panels. The new building would be designed with a modern architectural style that features a flat roof, a storefront with glazing, architectural finishes and louvers, steel beams, and metal panels.

The Project features white and light gray vertical metal cladding with pops of vertical green stripes and squares. The west and east facades of the building will feature large decorative glass windows showcasing vibrant green doors. Artistic murals would be incorporated on the east and south facades of the building. These features all add visual interest and provide architectural relief. At the street level, the building combines decorative metal panels, stonework, and landscaping to create a pedestrian oriented environment.

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

At the street level, the building combines decorative metal panels, stonework, and landscaping to create a pedestrian oriented environment. The Project would also include artistic murals on the east and south facades of the building. These features all add visual interest and a welcoming visual identity to the Project. The Project would feature a contemporary style and would include an attractively designed entry way.

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

The Project would incorporate guidelines as identified in the "Design Out Crime Guidelines: Crime Prevention Through Environmental Design," published by the Los Angeles Police Department, and will incorporate various security measures such as the use of security cameras, access control to the building, well-illuminated public and semi-public spaces designed with minimal dead space to eliminate areas of concealment, and locating building entrances in high-foot traffic areas. The Project also has separate vehicle and pedestrian entryways and walkways to minimize pedestrian and vehicle conflicts. The Project would also include lighting of building entries and walkways to provide for pedestrian orientation and to clearly identify and secure routes between parking areas and points of entry into the buildings.

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

The Project Site is located in an urbanized and highly developed area of the City, and the Project Site does not contain any natural areas or landscaping.

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

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

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

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

Overall, as shown above, the Project would be consistent with all of the objectives and policies in the Citywide Design Guidelines.

Conclusion

As discussed above, the Project would not conflict with applicable zoning or other regulations governing scenic quality. Therefore, impacts would be less than significant, and no mitigation measures are required.

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

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

Construction

While Project construction will comply with the City's permitted construction hours, it is possible that construction could 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 construction requires artificial light sources, such use would be temporary, would only occur during permitted construction hours, 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.[16] Additionally, as part of the Project, construction lighting would be shielded to minimize light spillover. Construction lighting, while potentially bright, would be focused on the particular area undergoing work.

Daytime glare could potentially occur during construction activities if reflective construction materials were positioned in highly visible locations where the reflection of sunlight could occur. However, any glare would be highly transitory and short-term, given the movement of construction equipment and materials within the construction area and the temporary nature of construction activities. In addition, large, flat surfaces that generate substantial glare are typically not an element of construction activities. Furthermore, temporary construction fencing comprised of a solid material or including screening would

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

be placed along the periphery of the Project Site to screen construction activity from view at the street level from off-site locations. Therefore, there would be a negligible potential for daytime or nighttime glare associated with construction activities to occur.

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

Operation

Light

The Project Site is located in a well-lit area of the City where there are moderate levels of ambient nighttime lighting, including street lighting, vehicle headlights, architectural and security lighting, and indoor building illumination (light emanating from structures through windows).

The Project would introduce new sources of light and glare that are typically associated with a storage building, including architecture, interior, security, and wayfinding lighting sources. However, all Project lighting would comply with current energy standards and codes, while providing efficient and effective on-site lighting. Nighttime security lighting for the Project would be provided to illuminate building entrances, parking areas, and internal roadways and walkways. Exterior lights would be wall- or ground-mounted and shielded away from adjacent land uses and security lighting would be designed to prevent light trespass onto adjacent properties. It is not anticipated that the amount of light emanating from the Project would represent a noticeable increase over current light levels.

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

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

Glare

Daytime glare can result from sunlight reflecting off a shiny surface, which can interfere with the performance of an off-site activity, such as the operation of a motor vehicle. Reflective surfaces can be associated with window glass and polished surfaces, such as metallic trim. In general, sun reflection that has the greatest potential to interfere with driving occurs from the lower stories of a structure. Similar to the existing development at the Project Site, sun reflection from the Project would occur during periods in which the sun is low on the horizon and when the point of reflection within the Project Site is in front of the driver, in the direction of travel.

The Project Site currently contains a 56,072 sf, vacant four-story office building and surface parking constructed of various non-reflective materials. No sources of substantial glare are anticipated with implementation of the Project. The Project's exterior building materials, including the windows and metal materials, would be designed to be non-reflective and to minimize the transmission of glare from the

Project, and no highly polished metals will be used. The Project building would be prohibited from using highly reflective building materials, such as mirrored glass, on exterior facades per City regulations.

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

Cumulative Impacts

With the exception of the 2965 West 6th Street Hotel Project, all of the Related Projects[17] are at a distance that they would not share the same viewshed would not have a potential to combine with the Project to create a cumulative aesthetics impact. No scenic vistas are available from the Project Site and the Project would not result in any cumulative impacts related to scenic vistas when combined with the 2965 West 6th Street Hotel Project. Similar to the Project, the Related Projects would be reviewed on a case-by-case basis by the City and would be required to comply with LAMC requirements regarding building heights, setbacks, massing, and lighting, and for those projects that require discretionary actions, to undergo site-specific review regarding building density and design, glare, and light.

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

[17] A list of the Related Projects and a map of their locations can be found below in Section 4.21, *Mandatory Findings of Significance*.

4.2 AGRICULTURE AND FORESTRY RESOURCES

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

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

No Impact. The Project Site is located in a highly urbanized setting and is currently developed with existing buildings and surface parking. No agricultural uses or related farmland operations are present within the Project Site or surrounding area. The Project Site is not located on designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program.[18] The urban character of the Project Site would be consistent

[18] State of California Department of Conservation, California Important Farmland Finder, https://maps.conservation.ca.gov/DLRP/CIFF/. Accessed November 11, 2025.

with the Farmland Mapping and Monitoring Program's definition of "Urban and Built-Up Land," which does not constitute farmland. Therefore, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses. Therefore, no impacts would occur, and no mitigation measures would be required.

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

No Impact. The Williamson Act of 1965 allows local governments to enter into contractual agreements with local landowners with the purpose of trying to limit specific parcels of land to agricultural or other related open space use. The Project Site currently includes two zones. The eastern portion of the Project Site is zoned Limited Commercial, CR-1 and the western portion is zoned Multiple Dwelling Zone, R4P-1. The proposed zoning for the Property is Commercial, C2-2. Accordingly, the Project Site is not zoned for agricultural use nor are there agricultural uses occurring on or in the vicinity of the Project Site. The Project Site is not zoned for agricultural uses presently and would not be rezoned to permit agricultural uses and is not subject to a Williamson Act contract. Furthermore, the Project Site is not enrolled in the California Williamson Act.[19] Therefore, no impacts would occur, and no mitigation measures would be required.

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

No Impact. The Project Site has a land use designation of Community Commercial. The eastern portion of the Project Site is zoned Limited Commercial, CR-1 and the western portion of the Project Site is zoned Multiple Dwelling Zone, R4P-1. As part of the Project approval, the Project proposes to change the Project Site's land use designation to Regional Commercial and to re-zone the Project Site entirely to Commercial Zone, C2-2. In the City, forest land is a permitted use in areas zoned OS (Open Space)[20] and no forest land exists on the Project Site. The City does not have specific zoning for timberland or timberland production; however, the Project Site is currently developed with a 56,072 sf, vacant four-story office building and a surface parking lot, is zoned for residential and commercial use, and does not include timberland or timberland production uses. As such, the Project would not conflict with existing zoning for forest land or timberland or result in the rezoning of forest land, timberland, or timberland production. Therefore, no impacts would occur, and no mitigation measures would be required.

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

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

[19] State of California Department of Conservation, Williamson Act Enrollment Finder, https://maps.conservation.ca.gov/dlrp/WilliamsonAct/. Accessed November 11, 2025.

[20] LAMC Section 12.04.05, "OS" Open Space Zone, https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-1514. Accessed November 11, 2025.

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

No Impact. The Project Site is located in an urban area of the City and is currently developed with a 56,072 sf, vacant four-story office building and associated parking lot. No agricultural uses, designated Farmland, or forest land uses occur at the Project Site or within the surrounding area. The Project would construct a new storage building and associated parking uses. As such, implementation of the Project would not result in the conversion of existing Farmland, agricultural uses, or forest land on- or off-site. Therefore, no impacts would occur, and no mitigation measures would be required.

Cumulative Impacts

No agricultural or forest uses exist within the Project Site or its vicinity. Therefore, the Project would not convert agricultural or forestry resources to other uses. In addition, the Project Site and adjacent properties are not designated or zoned for agricultural or forestry use, nor are the Project Site and adjacent parcels subject to Williamson Act contracts.[21] Furthermore, none of the Related Projects propose converting agricultural or forestry resources to other uses. Therefore, the Project would not contribute considerably to cumulative agriculture and forestry resources impacts, and cumulative agriculture and forestry resources impacts would be less than significant.

[21] State of California Department of Conservation, Williamson Act Enrollment Finder, https://maps.conservation.ca.gov/dlrp/WilliamsonAct/. Accessed November 11, 2025.

4.3 AIR QUALITY

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

The analysis is based on the information provided in the 525 South Virgil Avenue Project Air Quality Assessment, prepared by Kimley-Horn, dated September 2026 and contained in **Appendix A**.

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

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

The Project is located within the South Coast Air Basin (SCAB), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD is required, pursuant to the Federal Clean Air Act (FCAA), to reduce emissions of criteria pollutants for which the SCAB is in nonattainment. To reduce such emissions, the SCAQMD drafted the 2016 Air Quality Management Plan (AQMP) and 2022 AQMP. The 2016 AQMP establishes a program of rules and regulations directed at reducing air pollutant emissions and achieving the CAAQS and National Ambient Air Quality Standards (NAAQS).[22] The 2022

[22] South Coast Air Quality Management District, Final 2016 Air Quality Management Plan, page 1-1, 2017, https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf. Accessed November 25, 2025.

AQMP builds upon measures already in place from previous AQMPs.[23] The primary purpose of the 2022 AQMP is to identify, develop, and implement strategies and control measures to meet the 2015 8-hour Ozone (O_3) NAAQS. Air quality management planning is a regional and multi-agency effort including the SCAQMD, the California Air Resources Board (CARB), the Southern California Association of Governments (SCAG), and the U.S. EPA. The AQMP's pollutant control strategies are based on the latest scientific and technical information and planning assumptions, including SCAG's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), updated emission inventory methodologies for various source categories, and SCAG's latest growth forecasts. SCAG's latest growth forecasts were defined in consultation with local governments and with reference to local general plans. The Project is subject to the SCAQMD's AQMP.

Criteria for determining consistency with the AQMP are defined by the following indicators: [24]

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

According to the SCAQMD's CEQA Air Quality Handbook, the purpose of the consistency finding is to determine if a project is inconsistent with the assumptions and objectives of the regional air quality plans, and thus if it would interfere with the region's ability to comply with CAAQS and NAAQS.[25]

Consistency Criterion No. 1

The violations to which Consistency Criterion No. 1 refers are CAAQS and NAAQS. As shown below in Threshold b) and Threshold c), the Project would not exceed the SCAQMD's thresholds of significance for construction or operations. Therefore, the Project would not result in an increase in frequency or severity of existing air quality violations, or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP. As such, the Project would be consistent with the AQMP under the first criterion.

Consistency Criterion No. 2

Concerning Consistency Criterion No. 2, the 2022 AQMP contains air pollutant reduction strategies based on SCAG's 2020-2045 RTP/SCS. SCAG's growth forecasts are made in consultation with local governments and with reference to their local general plans. The City of Los Angeles General Plan designates the Project Site as Community Commercial. The eastern portion of the Project Site is zoned CR-1 and the western portion of the Project Site is zoned R4P-1. The Project proposes a General Plan Amendment to change the land use designation to Regional Commercial and a zone change to change the entire Project Site zoning

[23] South Coast Air Quality Management District, 2022 Air Quality Management Plan, page ES-2, 2022, http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan. Accessed November 25, 2025.
[24] South Coast Air Quality Management District, CEQA Air Quality Handbook, 1993.
[25] South Coast Air Quality Management District, CEQA Air Quality Handbook, 1993.

to C2-2. Once the designation and zoning is updated, the proposed Project would be permitted with a Conditional Use Permit (CUP)[26] pursuant to LAMC Section 12.24.W.50.

The 2020–2045 and 2024-2050 RTP/SCS provides socioeconomic forecast projections of regional population growth. The population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on the local plans and policies applicable to the specific area; these are used by SCAG in all phases of implementation and review.[27] Growth forecasts prepared by SCAG contained in the 2020-2045 RTP/SCS indicate that employment within the City will increase from 1,848,300 jobs in 2016 to 2,135,900 jobs in 2045, an increase of 287,600 jobs.[28,29] Growth forecasts prepared by SCAG contained in the 2024-2050 RTP/SCS indicate that employment within the City will increase from 1,954,000 in 2019 to 2,137,700 in 2050, an increase of 183,700 jobs.[30] The self-storage facility is anticipated to employ approximately four people (two full time and two part time employees). As the proposed Project would be consistent with the applicable land use regulations and represent approximately 0.001 percent of the anticipated employment increase projected by the 2020-2045 RTP/SCS and 0.002 percent of the increase projected by the 2024-2050 RTP/SCS, the Project's employee increase would be within local and regional employment projections. The Project would also generate short-term construction jobs, but these jobs would not necessarily bring new construction workers or their families into the region since construction workers are typically drawn from an existing regional pool of construction workers who travel among construction sites within the region as individual projects are completed and are not typically brought from other regions to work on developments such as the Project. Thus, the Project would also be consistent with the AQMP under the second criterion.[31]

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

City of Los Angeles Policies

As discussed above, the Air Quality Element was adopted on November 24, 1992, and sets forth the goals, objectives, and policies that guide the City in the implementation of its air quality improvement programs and strategies. The Air Quality Element acknowledges the interrelationships among transportation and land use planning in meeting the City's mobility and air quality goals. To achieve the goals of the Air Quality Element, performance-based standards have been adopted by the City of Los Angeles to provide flexibility

---

[26] City of Los Angeles, City of Los Angeles Municipal Code, Section 12.24, Conditional Use Permits and Other Similar Quasi-Judicial Approvals, https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-115396. Accessed November 25, 2025.

[27] Southern California Association of Governments (SCAG), Connect SoCal (2020 – 2045 Regional Transportation Plan/Sustainable Communities Strategy), page 12, 2020, https://scag.ca.gov/read-plan-adopted-final-connect-socal-2020. Accessed October 8, 2025.

[28] SCAG, Connect SoCal, Demographics and Growth Forecast, page 35, 2020, https://scag.ca.gov/sites/default/files/old/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf. Accessed November 25, 2025.

[29] Note the 2022 AQMP incorporates growth projections from the 2020-2045 RTP/SCS. For informational purposes consistency with the 2024-2050 RTP/SCS growth projections is included.

[30] SCAG, Connect SoCal 2024, Demographics and Growth Forecast, page 40, 2024, https://www.scag.ca.gov/sites/default/files/2024-05/23-2987-tr-demographics-growth-forecast-final-040424.pdf. Accessed November 25, 2025.

[31] The AQMP also contains assumptions for housing units and population growth; however, because the Project is not a housing project and because the Project is not expected to generate an increase in population, as discussed above, these assumptions are not pertinent to this analysis.

in implementation of its policies and objectives. The goals, objectives, and policies provided in the Air Quality Element applicable to the Project include the following:

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

- Objective 1.1: It is the objective of the City of Los Angeles to reduce air pollutants consistent with the Regional Air Quality Management Plan (AQMP), increase traffic mobility, and sustain economic growth citywide.
- Objective 1.3: It is the objective of the City of Los Angeles to reduce particulate air pollutants emanating from unpaved areas, parking lots, and construction sites.
- Policy 1.3.1: Minimize particulate emissions from construction sites.
- Policy 1.3.2: Minimize particulate emissions from unpaved roads and parking lots which are associated with vehicular traffic.

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

Goal 4: Minimal impact of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.

- Objective 4.1: It is the objective of the City of Los Angeles to include the regional attainment of ambient air quality standards as a primary consideration in land use planning.
- Objective 4.2: It is the objective of the City of Los Angeles to reduce vehicle trips and vehicle miles traveled associated with land use patterns.
- Policy 4.2.3: Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.

The Project Site location within an existing developed urban area would reduce VMT and related vehicle emissions in comparison to a project located in a non-urban environment. High population density would result in employees and visitors potentially living closer to the Project Site, reducing travel distances and overall VMT with the co-benefit of decreasing pollutant emissions from mobile sources. The Project would provide alternative modes of transportation, including access to public transit within 0.5 miles of the Project Site and opportunities for walking and biking, thereby facilitating a reduction in VMT. The Project would provide short- and long-term bicycle parking spaces and EV parking spaces as required by the LAMC. In addition, the Project would be consistent with the development pattern in the vicinity that features greater concentration of urban density along major arterials and near transit options. As such, the Project would not conflict with or obstruct implementation of the Air Quality Element.

Conclusion

The analysis above is based on the Project's consistency with the AQMP as well as the Air Quality Element goals, objectives, and policies that are relevant to the Project. The determination of AQMP consistency is primarily concerned with the long-term influence of the Project on air quality in the SCAB. As discussed above, the Project would not increase the frequency or severity of an existing air quality violation or cause or contribute to new violations for these pollutants. As the Project would not exceed any of the State and federal standards, the Project would also not delay timely attainment of air quality standards or interim

emission reductions specified in the AQMP. In addition, because the Project is consistent with the growth projections that form the basis of the 2022 AQMP, the Project would be consistent with the emission forecasts in the AQMP. Furthermore, with adherence to the regulatory requirements identified above, no significant air quality impacts would occur and as such, no mitigation measures are necessary for the Project to meet this AQMP consistency criterion. As the Project would support the City's and SCAQMD's objectives of reducing VMT and the related vehicular air emissions, the Project would be consistent with AQMP control measures.

Project implementation would not exceed the SCAQMD's Local Significance Thresholds (LSTs), which were developed to ensure no exceedances of the CAAQS or NAAQS. As the Project would not increase the frequency or severity of an existing air quality violation or cause or contribute to new violations for air quality pollutants (including volatile organic compounds (VOC), nitrogen oxides (NO_X), carbon monoxide (CO), sulfur oxides (SO_X), particulate matter 10 microns or less in diameter (PM_{10}), and particulate matter 2.5 microns or less in diameter ($PM_{2.5}$)), the Project also would not delay timely attainment of air quality standards or interim emission reductions specified in the AQMP. In addition, the Project would be consistent with the population and employment growth projections in the AQMP.

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

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

South Coast Air Quality Management District Thresholds

Less Than Significant Impact. The SCAQMD CEQA Air Quality Handbook provides significance thresholds for VOC (also referred to as reactive organic gases [ROG]), NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$. The thresholds apply to both the construction and operation of projects located within the SCAQMD jurisdictional boundaries. If the SCAQMD thresholds are exceeded, a potentially significant impact could result. If a project proposes development that would result in criteria pollutant emissions in excess of the established thresholds, as outlined in **Table 2**: *South Coast Air Quality Management District Significance Thresholds,* a significant air quality impact may occur, and additional analysis is warranted to fully assess the significance of impacts.[32]

Table 2: South Coast Air Quality Management District Significance Thresholds

Pollutant	Mass Daily Thresholds (pounds per day)	
	Construction	Operations
Volatile Organic Compounds (VOC)/ Reactive Organic Gases (ROG)[1]	75	55
Carbon Monoxide (CO)	550	550
Nitrogen Oxides (NO_X)	100	55
Sulfur Oxides (SO_X)	150	150
Coarse Particulates (PM_{10})	150	150
Fine Particulates ($PM_{2.5}$)	55	55

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

Pollutant	Mass Daily Thresholds (pounds per day)	
	Construction	Operations
1. VOCs and ROGs are subsets of organic gases that are emitted from the incomplete combustion of hydrocarbons or other carbon-based fuels. Although they represent slightly different subsets of organic gases, they are used interchangeably for the purposes of this analysis.		
Source: South Coast Air Quality Management District, *South Coast AQMD Air Quality Significance Thresholds*, March 2023.		

Regional Construction

Construction associated with the Project, including motor vehicle exhaust associated with on- and off-site construction equipment, materials deliveries and worker trips, and the movement of construction equipment, particularly on unpaved surfaces, would generate short-term emissions of criteria air pollutants. The criteria pollutants of primary concern within the SCAB include O_3-precursor pollutants (i.e., VOC and NO_X), PM_{10}, and $PM_{2.5}$. Construction-generated emissions of these criteria pollutants would be short-term and temporary, lasting only as long as construction activities occur, but would be considered a significant air quality impact if the volume of pollutants generated were to exceed the SCAQMD's thresholds of significance.

Emissions of airborne particulate matter are largely generated by motor vehicle exhaust and ground disturbance. With respect to ground disturbance, the volume of airborne particulate matter is largely dependent on the amount of ground disturbance associated with site preparation activities, as well as weather conditions and the appropriate application of water as dust control. Mobile source emissions, primarily NO_X, would result from the use of construction equipment, such as dozers, loaders, and cranes. During the finishing of the Project, paving and the application of architectural coatings (e.g., paints) would potentially release VOCs. Construction emissions would vary substantially from day to day, depending on the level of activity, the specific type of operation, and for dust, the prevailing weather conditions.

Fugitive dust emissions from construction may temporarily become a nuisance and potential health hazard to those living and working nearby. Project construction would comply with applicable SCAQMD rules and regulations, including SCAQMD Rule 402 (Nuisance), Rule 403 (Fugitive Dust), and Rule 1113 (Architectural Coatings). SCAQMD Rule 402 (Nuisance) prohibits the discharge of air contaminants or other material that cause a nuisance. SCAQMD Rule 403 (Fugitive Dust) requires fugitive dust control measures. SCAQMD Rule 1113 (Architectural Coatings) provides specifications on painting practices and regulates the ROG content of paint. Project construction would additionally comply with CARB's anti-idling regulations, which prohibit heavy-duty diesel vehicle idling for more than five minutes.

Construction activities for the Project are expected to begin in the second quarter of 2027. Construction-generated emissions associated with the Project were calculated using the California Emissions Estimator Model (CalEEMod), version 2022 (the latest version), which is designed to model emissions for land use development projects based on typical construction requirements. Project construction would include demolition, site preparation, shoring and grading, infrastructure improvements/detention system, building construction, architectural coating applications, and paving, as well as off-site driveway improvements. **Table 3:** *Project Construction Equipment,* shows the equipment required for each construction phase and the number of hours per day they would be used. See **Appendix A** for more information regarding the construction assumptions used in this analysis.

Table 3: Project Construction Equipment

Construction Phase	Equipment	Quantity	Number of Hours Used per Day
Demolition	Tractor/Loader/Backhoe	2	8
	Excavator	1	8
Site Preparation	Grader	1	8
	Tractor/Loader/Backhoe	1	8
	Excavator	1	8
Shoring	Vibratory Pile Driver	1	8
	Auger Drill Rig	1	8
	Skid Steer	1	8
	Forklift	1	8
	Excavator	1	8
Grading	Grader	1	8
	Tractor/Loader/Backhoe	2	7
Building Construction	Crane	1	6
	Forklift	1	6
	Pump	2	8
Paving	Tractor/Loader/Backhoe	1	8
	Paver	1	6
	Cement and Mortar Mixers	1	6
Architectural Coating	Air Compressor	2	6
Infrastructure Improvements	Excavator	1	8
	Tractor/Loader/Backhoe	1	8
	Trencher	1	8

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

The predicted maximum daily construction-generated criteria pollutant emissions for the proposed Project are reported in **Table 4**: *Project Construction Emissions.* As noted in **Table 4**, the Project's emissions were calculated assuming mandatory compliance with SCAQMD Rule 403, fugitive dust control measures.

Table 4: Project Construction Criteria Pollutant Emissions

Construction Year	Emissions (pounds per day)[1]					
	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Year 1 (2027) Maximum Daily Construction Emissions	1.58	20.41	21.71	0.09	3.75	1.30
Year 2 (2028) Maximum Daily Construction Emissions	31.19	15.53	22.78	0.04	2.52	1.08
Cumulative Maximum Daily Construction Emissions	31.19	20.41	22.78	0.09	3.75	1.30
SCAQMD Threshold	75	100	550	150	150	55
SCAQMD Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

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

Source: CalEEMod version 2022. Refer to **Appendix A**.

The results summarized on **Table 4** show that the Project's regional criteria pollutant emissions during construction would remain well below applicable thresholds. As noted above, Project compliance with

SCAQMD Rules 402 (Nuisance) and Rule 1113 (Architectural Coatings) and CARB's anti-idling regulations was not assumed when estimating the Project's construction emissions in **Table 4**. Therefore, the Project's maximum-day construction emissions of criteria pollutants are conservative and are expected to be even lower than reported in **Table 4** when the Project's compliance with SCAQMD Rules 402 and 1113 and CARB's anti-idling regulations are taken into account.

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

Regional Operations

The Project's operational emissions would be associated with area sources, energy sources, and mobile sources. Primary sources of operational criteria pollutants are from motor vehicle use and area sources. **Table 5**: *Operational Emissions,* summarizes the operational emissions attributable to the proposed Project. Emissions from existing uses on the Project Site would be minimal, and credit has not been taken for their removal. Should emissions associated with existing uses (to be demolished) be accounted for and subtracted from the total emissions, the net Project emissions would be even lower than shown in **Table 5.**

As shown in **Table 5**, the Project's operational criteria pollutant emissions would be well below the SCAQMD thresholds. Therefore, impacts would be less than significant, and no mitigation measures are required.

Table 5: Operational Criteria Pollutant Emissions

Source	Emissions (pounds per day)[1, 2]					
	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Proposed Project						
Area	7.87	0.09	11.00	0.00	0.02	0.01
Energy	0.06	1.08	0.91	0.01	0.08	0.08
Mobile	1.24	0.84	8.89	0.02	1.99	0.51
Estimated Project Total	9.16	2.01	20.79	0.03	2.09	0.61
SCAQMD Threshold	55	55	550	150	150	55
SCAQMD Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**
VOC = volatile organic compounds; NO_x = nitrogen oxide; CO = carbon monoxide; SO_2 = sulfur dioxide; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter 1. Worst-case seasonal maximum daily emissions are reported. 2. Emissions may not add up due to rounding.						
Source: CalEEMod version 2022. Refer to **Appendix A**.						

c) Expose sensitive receptors to substantial pollutant concentrations?[33]

Less Than Significant Impact.

Localized Construction Impacts

The nearest sensitive receptor to the Project Site are residential uses located approximately 44 feet (13 meters) to the northwest. To assess the potential for Project construction to create impacts to sensitive

[33] See **Appendix A** for a discussion of health impacts.

receptors, SCAQMD recommends utilizing its LSTs for construction.[34] The LSTs were developed in response to the SCAQMD Governing Boards' Environmental Justice Enhancement Initiative and are based on the ambient concentrations of the pollutant at issue for each source receptor area and distance to the nearest sensitive receptor.[35] LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the State or federal ambient air quality standard (applying the more stringent of the two).[36] SCAQMD provided the *Final Localized Significance Threshold Methodology* (dated June 2003 [revised 2008]) for guidance.[37] The LST methodology assists lead agencies with conducting project-specific analysis of the potential localized impacts associated with proposed development projects.

CalEEMod calculates construction emissions based on the number of equipment hours and the maximum daily soil disturbance activity possible for each piece of equipment. Based on the LST guidance and disturbance rates from CalEEMod, **Table 6:** *Equipment-Specific Grading Rates* was used to determine the maximum daily disturbed acreage for the LST analysis.[38] For this Project, the appropriate source receptor area (SRA) for the LSTs is SRA 1 (Central Los Angeles), since this area includes the Project Site. LSTs only take into consideration emissions of NO_X, CO, PM_{10}, and $PM_{2.5}$.[39] SCAQMD produced look-up tables for projects that disturb areas less than or equal to five acres in size.[40] Based on the Project-specific construction equipment modeled in CalEEMod and **Table 3**, the grading phase of Project construction was calculated to disturb approximately half an acre in a single day. As SCAQMD does not provide LSTs for daily soil disturbances less than 1-acre, the 1-acre LST threshold was used to analyze the local significance of Project construction emissions.

Table 6: Equipment-Specific Grading Rates

Construction Phase	Equipment Type	Equipment Quantity	Acres Graded per 8-Hour Day	Operating Hours per Day	Acres Graded per Day
Grading	Dozer	0	0.5	8	0
	Grader	1	0.5	8	0.5
	Crawler Tractor	0	0.5	8	0
	Scraper	0	1	8	0
				Total Acres Graded per Day	**0.5**
Source: CalEEMod version 2022.					

SCAQMD's methodology states that "off-site mobile emissions from the Project should not be included in the emissions compared to LSTs."[41] Therefore, for purposes of the construction LST analysis, only the emissions included in the CalEEMod "on-site" emissions outputs were considered. LST thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. The nearest sensitive

[34] South Coast Air Quality Management District (SCAQMD), Final Localized Significance Threshold Methodology, Revised 2008, http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds. Accessed November 25, 2025.
[35] SCAQMD, Final Localized Significance Threshold Methodology, page 1-1, Revised 2008.
[36] SCAQMD, Final Localized Significance Threshold Methodology, page 1-1, Revised 2008.
[37] SCAQMD, Final Localized Significance Threshold Methodology, Revised 2008.
[38] SCAQMD, Fact Sheet for Applying CalEEMod to Localized Significance Thresholds, https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/caleemod-guidance.pdf?sfvrsn=98641d61_2. Accessed November 25, 2025.
[39] SCAQMD, Final Localized Significance Threshold Methodology, page 2-5. Revised 2008.
[40] SCAQMD, Final Localized Significance Threshold Methodology, Appendix C – Mass Rate LST Look-up Tables, Revised 2009, https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf?sfvrsn=8e641d61_2. Accessed November 25, 2025.
[41] SCAQMD, Final Localized Significance Threshold Methodology, page 1-4, Revised 2008.

receptor to the Project Site are residential uses located approximately 44 feet (13 meters) to the northwest. SCAQMD's LST guidance recommends using the 25-meter threshold for receptors located 25 meters (approximately 82 feet) or less from the Project Site.[42] Therefore, the LSTs for a 1-acre site with a sensitive receptor distance of 25 meters was used for the LST construction analysis, consistent with the SCAQMD's LST guidance and methodology.

Table 7: *Localized Significance of Construction Emissions,* presents the Project's localized emissions during construction, which were modeled in compliance with SCAQMD Rule 403. As stated above, compliance with SCAQMD Rules 402 and 1113 and CARB anti-idling regulations were not assumed when estimating the Project's localized construction emissions for **Table 7** even though the Project would ultimately comply with these requirements, as applicable. Therefore, the Project's maximum-day localized construction emissions analysis is conservative and actual emissions would actually be lower than reported in **Table 7. Table 7** shows that the emissions of these pollutants on the peak day of construction would be well below the LSTs and therefore would not expose the nearest sensitive receptors to substantial pollutant concentrations or cause or contribute to an exceedance of State or federal ambient air quality standards. Thus, impacts relating to localized construction air pollutant concentrations would be less than significant, and no mitigation measures are required.

Table 7: Localized Significance of Construction Emissions

Source/Activity	Emissions (pounds per day)[1,2,3]			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Individual Construction Phase				
Demolition (2027)	2.79	4.84	1.36	0.21
Site Preparation (2027)	4.25	6.57	0.33	0.19
Shoring (2027)	4.93	8.06	0.18	0.16
Grading (2027)	4.18	6.99	0.33	0.19
Infrastructure Improvements/ Detention System (2027)	3.02	4.34	0.09	0.09
Building Construction (2027)	11.62	13.20	0.60	0.55
Building Construction (2028)	11.15	13.13	0.59	0.54
Architectural Coating (2028)	1.62	2.24	0.03	0.03
Paving (2028)	2.32	3.70	0.09	0.08
Overlapping Construction Phases				
Shoring + Grading (2027)	9.11	15.05	0.50	0.35
Building Construction + Architectural Coating (2028)	12.77	15.37	0.62	0.57
Building Construction + Paving (2028)	13.47	16.83	0.67	0.62
Maximum Daily Emissions	13.47	16.83	1.45	0.62
SCAQMD LST (for 1 acre at 25 meters)	74	680	5	3
Maximum Daily Emissions Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**

NO_x = nitrogen oxide; CO = carbon monoxide; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter

1. Mandatory compliance with SCAQMD Rule 403 Fugitive Dust assumed. The Rule 403 reduction/credits include the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; water all haul roads twice daily; and limit speeds on unpaved roads to 15 miles per hour. Reductions percentages from the SCAQMD CEQA Handbook (Tables XI-A through XI-E) were applied. Refer to **Appendix A** for Model Data Outputs.
2. Worst-case seasonal maximum daily emissions are reported.
3. Emissions may not add up due to rounding.

[42] SCAQMD, Final Localized Significance Threshold Methodology, page 3-3, Revised 2008.

Source/Activity	Emissions (pounds per day)[1,2,3]			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Source: CalEEMod version 2022. Refer to **Appendix A** for model outputs.				

Localized Operational Impacts

According to SCAQMD's LST methodology, operational LSTs apply only to on-site sources.[43] LSTs for receptors located at 25 meters for SRA 1 were utilized in this analysis. The Project Site is approximately 0.97-acres. As SCAQMD does not provide LSTs for projects less than 1-acre, the 1-acre LST threshold was used for the Project Site.[44] The on-site operational emissions were calculated using CalEEMod and are compared to the LST thresholds in **Table 8:** *Localized Significance of Operational Emissions*.

Table 8: Localized Significance of Operational Emissions

Activity	Emissions (pounds per day)[1, 2]			
	NO_X	CO	PM_{10}	$PM_{2.5}$
On-Site Emissions (Area and Energy Sources)	1.17	11.90	0.10	0.10
SCAQMD Localized Screening Threshold (adjusted for 1 acre at 25 meters)	*74*	*680*	*2*	*1*
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**
NO_x = nitrogen oxide; CO = carbon monoxide; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter 1. On-site emissions consist of area sources and energy sources. 2. Emissions may not add up due to rounding.				
Source: CalEEMod version 2022. Refer to **Appendix A** for model outputs.				

Table 8 shows the maximum daily emissions during operations would be well below the respective SCAQMD LSTs and are thus not expected to result in significant concentrations of pollutants at the nearest sensitive receptors. Therefore, Project implementation would not cause or contribute to an exceedance of State or federal ambient air quality standards. Impacts relating to localized operational air pollutant concentrations would be less than significant and no mitigation measures are required.

Carbon Monoxide Hotspots

It has long been recognized that CO exceedances are caused by vehicular emissions, primarily when vehicles are idling at intersections. Vehicle emissions standards have become increasingly stringent in the last 20 years. Currently, the CO standard in California is a maximum of 3.4 grams per mile for passenger cars (requirements for certain vehicles are more stringent).[45] With the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities, CO concentrations have steadily declined.

Accordingly, with steadily decreasing CO emissions from vehicles, even very busy intersections do not result in exceedances of the CO standard. An analysis prepared for CO attainment in the SCAB by the SCAQMD can assist in evaluating the potential for CO exceedances. CO attainment was thoroughly analyzed as part of the SCAQMD's 2003 AQMP[46] and the 1992 Federal Attainment Plan for Carbon

[43] SCAQMD, Final Localized Significance Threshold Methodology, page 3-2.

[44] The construction LST analysis is based on the amount of daily ground disturbance, which was calculated to be 1-acre. The operational LST analysis is based on the actual Project Site acreage.

[45] California Air Resources Board (CARB), The California Low-Emission Vehicle Regulations, page 20, 2019, https://ww2.arb.ca.gov/sites/default/files/2019-07/cleancomplete%20lev-ghg%20regs%2010-19.pdf. Accessed November 25, 2025.

[46] SCAQMD, Final 2003 AQMP, Appendix V, Modeling and Attainment Demonstrations, 2003, https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2003-air-quality-management-plan/2003-aqmp-appendix-v.pdf?sfvrsn=73051d61_2. Accessed November 25, 2025.

Monoxide (1992 CO Plan).[47] CO modeling was performed as part of the 1992 CO Plan and subsequent plan updates and AQMPs. The SCAB was re-designated as attainment for CO in 2007.[48] Therefore, CO is no longer addressed in the SCAQMD's AQMP.

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

The 2003 AQMP is the most recent AQMP that addressed CO concentrations because the SCAB was designated as maintenance of the CO NAAQS in 2007. As part of the 2003 AQMP CO Modeling Attainment Demonstration, an updated analysis was performed based on the 1992 CO Plan using more recent modeling techniques (dispersion modeling, emission factors).[49] The Wilshire Boulevard and Veteran Avenue intersection, one of the most congested intersections in Southern California with an ADT volume of approximately 100,000 vehicles per day, was modeled for CO concentrations. This modeling effort identified a CO concentration high of 4.6 ppm, which is well below the 35 ppm federal standard. Thus, a project would only potentially result in a CO hot spot if a project intersection would exceed 100,000 vehicles per day. If all nearby intersections have an ADT of less than 100,000 after factoring in a project, it can be assumed that the project will not create a CO hot spot.

According to the Project's Transportation Assessment (**Appendix J**), the Project intersection with the greatest existing ADT is Westmoreland Avenue between 5th Street and 6th Street with 27,570 daily vehicles, which is well below the comparative 100,000 ADT for the Wilshire Boulevard and Veteran Avenue intersection.[50] Even with the Project's 433 total daily vehicle trips included,[51] the nearby intersections would all still be well below the 100,000 ADT threshold. Thus, the Project would not generate CO hotspots at any intersection within the Project area. Therefore, impacts associated with CO hot spots would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact.

Construction

Project construction activities could generate odors from off-road equipment diesel exhaust, architectural coatings containing VOCs, and paving activities. However, the Project would be required to comply with

[47] SCAQMD, Federal Attainment Plan for Carbon Monoxide, 1992.
[48] SCAQMD, CO Attainment Status, 2007, https://www.aqmd.gov/docs/default-source/bact/policy-and-guidance-documents/8-9-07-coattainmentstatus2.pdf?sfvrsn=6. Accessed November 25, 2025.
[49] SCAQMD, Final 2003 AQMP, Appendix V, Modeling and Attainment Demonstrations, 2003, https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2003-air-quality-management-plan/2003-aqmp-appendix-v.pdf?sfvrsn=73051d61_2. Accessed November 25, 2025.
[50] Gibson Transportation Consulting, Transportation Assessment, 2026.
[51] Gibson Transportation Consulting, Transportation Assessment, 2026.

construction regulations and rules that would minimize odor production. For example, the Project would be required to comply with SCAQMD Rule 402, Nuisance, which states:

> *"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."*

Additionally, the Project would be subject to Code of Federal Regulations [CFR], Part 1926 – *Safety and Health Regulations for Construction,* Subpart H – *Materials Handling, Storage Use and Disposal, et al*., which regulates construction materials storage, use, and disposal. The Project's compliance with the applicable regulations would prevent the production of significant odors. Moreover, any odors that were produced would be temporary, lasting only as long as construction activities occur, and they would disperse rapidly. Therefore, construction-related odors are not expected to affect a substantial number of people. As such, impacts would be less than significant, and no mitigation is required.

Operational

The SCAQMD *CEQA Air Quality Handbook* identifies certain land uses as sources of odors. These land uses include agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding.[52] The proposed Project would develop an eight-story self-storage facility, a common commercial use not associated with any odors. The Project would not include any of the land uses that have been identified by the SCAQMD as significant odor sources nor any land use that would reasonably be expected to cause noticeable odors. Therefore, Project implementation would not create objectionable odors and associated impacts would be less than significant. No mitigation measures would be required.

Cumulative Impacts

The cumulative setting for air quality includes the City and the SCAB. The SCAB is designated as a nonattainment area for State standards for O_3, PM_{10}, and $PM_{2.5}$.[53] For federal standards, the SCAB is designated as a partial nonattainment area for Pb and nonattainment for O_3 and $PM_{2.5}$, attainment and serious maintenance for federal PM_{10} standards, and unclassified or attainment for all other pollutants.[54] Cumulative growth in population and vehicle use could inhibit efforts to improve regional air quality and attain the ambient air quality standards. However, as a result of regulatory requirements and improved technology, air quality in the SCAB has improved over time despite population growth and increased vehicle usage and is expected to continue improving in the future.

According to SCAQMD, a project whose emissions would exceed SCAQMD thresholds would also contribute to a cumulatively significant impact and, conversely, a project whose emissions are below

[52] SCAQMD, CEQA Air Quality Handbook, 1993.

[53] SCAQMD, 2022 Air Quality Management Plan, page 2-15, 2022, http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan. Accessed November 25, 2025.

[54] United States Environmental Protection Agency, Nonattainment Areas for Criteria Pollutants (Green Book), https://www.epa.gov/green-book. Accessed November 25, 2025.

SCAQMD thresholds would not make a cumulatively considerable contribution to a significant cumulative impact.[55]

Cumulative Short-Term Emissions

The SCAB is designated nonattainment for O_3, PM_{10}, and $PM_{2.5}$ under the State standards and nonattainment for O_3 and $PM_{2.5}$ under the federal standards. As discussed above, the Project's construction-related emissions, by themselves, would not exceed the SCAQMD significance thresholds for criteria pollutants. Furthermore, if a project is estimated to result in emissions that do not exceed SCAQMD thresholds, the project's contribution to the cumulative impact on air quality in the SCAB is not cumulatively considerable.[56] As shown in **Table 4** above, Project construction-related emissions would not exceed SCAQMD significance thresholds for any of the criteria pollutants. Therefore, the Project would not generate a cumulatively considerable contribution to air pollutant emissions during construction.

SCAQMD has developed strategies to reduce criteria pollutant emissions as outlined in the AQMP pursuant to the FCAA mandates. The analysis assumes fugitive dust controls would be used during construction, including frequent water applications in accordance with SCAQMD requirements. SCAQMD rules, mandates, and compliance with adopted AQMP emissions control measures would also be imposed on construction projects throughout SCAB, which would include the Related Projects. As concluded above, the Project's construction-related impacts would be less than significant, and its compliance with SCAQMD rules and regulations would further minimize the proposed Project's construction-related emissions. Therefore, Project-related construction emissions, in combination with those from other, Related Projects in the area, would not substantially deteriorate the local air quality. Thus, the Project's construction-related emissions would not result in a cumulatively considerable contribution to significant cumulative air quality impacts.

Cumulative Operational Impacts

The Los Angeles County portion of the Air Basin is currently in nonattainment for O_3, NO_2, PM_{10}, and $PM_{2.5}$ and as such, cumulative projects could exceed an air quality standard or contribute to an existing or projected air quality exceedance. Cumulative impacts to air quality are evaluated under two sets of thresholds for CEQA and the SCAQMD. In particular, Section 15064(h)(3) of the CEQA Guidelines provides guidance in determining the significance of cumulative impacts.

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

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

[55] SCAQMD, White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution, Appendix D, page D-3, 2003, https://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper-appendix.pdf. Accessed November 25, 2025.

[56] SCAQMD, White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution, Appendix D, page D-3, 2003.

resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency."

For purposes of the cumulative air quality analysis with respect to CEQA Guidelines Section 15064(h)(3), the Project's incremental contribution to cumulative air quality impacts is determined based on compliance with the SCAQMD adopted AQMP. As discussed above, the Project would not conflict with or obstruct implementation of AQMP and would be consistent with the growth projections in the AQMP. Nonetheless, SCAQMD no longer recommends relying solely upon consistency with the AQMP as an appropriate methodology for assessing cumulative air quality impacts. The SCAQMD developed the operational thresholds of significance based on the level above which individual project emissions would result in a cumulatively considerable contribution to the SCAB's existing air quality conditions. Therefore, a project that exceeds the SCAQMD operational thresholds would also be a cumulatively considerable contribution to a significant cumulative impact.[57]

As shown above, the Project's operational emissions would not exceed SCAQMD thresholds. As a result, operational emissions associated with the Project would not result in a cumulatively considerable contribution to significant cumulative air quality impacts. Additionally, adherence to SCAQMD rules and regulations would alleviate potential impacts related to cumulative conditions on a project-by-project basis. Project operations would not result in an incremental contribution to long-term emissions of non-attainment pollutants and O_3 precursors, considered together with cumulative projects, and thus would not be cumulatively considerable. Therefore, impacts would be less than significant, and no mitigation measures are required.

[57] SCAQMD, White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution, August 2003.

4.4 BIOLOGICAL RESOURCES

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

The following discussion regarding biological resources is based, in part, on the *City of Los Angeles Street Tree Evaluation* (Tree Evaluation), prepared by Arborgate Consulting, Inc., dated August 20, 2025 and contained in **Appendix B**.

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

Less than Significant Impact. The Project Site is located in an urbanized and developed area of the City and is currently developed with a 56,072 sf, vacant four-story office building and associated surface

parking lot. As discussed in the Tree Evaluation (**Appendix B**), there are no trees on the Project Site and there are four Indian laurel street trees adjacent to the Project Site on Virgil Street growing in small sidewalk cutouts. The Project Site does not contain any habitat capable of sustaining any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS). There are no known locally designated natural communities at the Project Site or in the immediate vicinity, nor is the Project Site located immediately adjacent to undeveloped natural open space or a natural water source that may otherwise serve as habitat for State or federally listed species.[58, 59] Species likely to occur on-site are limited to small terrestrial and avian species typically found in urban developed settings.

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

The Tree Evaluation for the Project Site found four Indian laurel street trees on Virgil Street adjacent to the Project Site. While the four trees are not a protected species, they fall under the jurisdiction of the City's Urban Forestry Division. The two northern trees would be removed to accommodate the Project's new transformer yard and new entry drive. The two southern trees could be retained and preserved, but changes to the surrounding paving would be needed, as well as cautious protection during redevelopment. The Project will replace the two northern trees at a 2:1 ratio or pay the applicable in-lieu fees in accordance with City regulations and subject to City approval.

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

[58] California Department of Fish and Wildlife (CDFW), Natural Community Conservation Plans/Habitat Conservation Plans, https://wildlife.ca.gov/conservation/planning/nccp/plans. Accessed December 2, 2025.

[59] U.S. Fish and Wildlife Service (USFWS), National Wetlands Inventory, www.fws.gov/wetlands/Data/Mapper.html. Accessed December 2, 2025.

Regulatory Compliance Measures

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

RCM-BIO-2: Proposed Project activities (including disturbances to native and non-native vegetation, structures, and substrates) should take place outside of the breeding bird season, which generally runs from March 1- August 31 (as early as February 1 for raptors), to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill (Fish and Game Code Section 86).

If Project activities cannot feasibly avoid the breeding bird season, beginning thirty days prior to the disturbance of suitable nesting habitat, the applicant shall:

- Arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within 300 feet of the construction work area (within 500 feet for raptors) as access to adjacent areas allows. The surveys shall be conducted by a Qualified Biologist with experience in conducting breeding bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of clearance/construction work.
- If a protected native bird is found, the applicant shall delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species (within 500 feet for suitable raptor nesting habitat) until August 31.
- Alternatively, the Qualified Biologist could continue the surveys in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest (within 500 feet for raptor nests) or as determined by a qualified biological monitor, shall be postponed until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. The buffer zone from the nest shall be established in the field with flagging and stakes. Construction personnel shall be instructed on the sensitivity of the area.
- The Applicant shall record the results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds. Such record shall be submitted and received into the case file for the associated discretionary action permitting the Project.

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

No Impact. The Project Site is located within a developed, urban portion of the City and no watercourses, riparian habitat, including wetlands,[60] or other sensitive natural communities, such as Significant Ecological Areas or Coastal Resource Areas,[61] exist or are mapped on or near the Project Site. Since neither the Project Site nor adjacent areas are within a biological resource area or Significant Ecological Area, implementation of the Project would not result in any adverse impacts to riparian habitat or other sensitive natural communities. As such, the Project would not have the potential to adversely affect riparian habitat or other sensitive natural communities. Therefore, no impact would occur, and no mitigation measures are required.

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

No Impact. As previously discussed, no wetlands exist or are mapped on or near the Project Site.[62] In addition, the Project does not propose any filling or grading of any ravines or other hydrologically low-lying areas that may contain intermittent waterbodies. As such, the Project would not have the potential to affect wetlands. As discussed above, no riparian or other sensitive habitat areas are located on or adjacent to the Project Site. As discussed above, neither the Project Site nor adjacent areas are within a biological resource area or Significant Ecological Area. Thus, implementation of the Project would not result in any adverse impacts to state or federally protected wetlands such as marshes vernal pools, or coastal areas. Therefore, no impact would occur, and no mitigation measures are required.

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

Less than Significant Impact. The Project Site is currently developed and is located in a highly urbanized area in the City. No wildlife corridors or native wildlife nursery sites are present on the Project Site or in the surrounding area. Furthermore, due to the urbanized nature of the Project Site area, the potential for native resident or migratory wildlife species movement through the Project Site is negligible. Nonetheless, the non-native street trees surrounding the Project Site could support raptor and/or songbird nests. The Project proposes to remove two of the street trees and retain the other two street trees. In accordance with City regulations and subject to City approval, the Project will replace the two removed street trees at a 2:1 ratio or pay the applicable in-lieu fees.

Additionally, the Project would be required to comply with the MBTA and applicable State laws, which would reduce its potential impacts to migratory bird species that could potentially nest in the two street trees that would be removed as part of the Project (see RCM-BIO-1 and RCM-BIO-2 above). Thus, the Project would not interfere substantially with the movement of any native resident or migratory fish,

[60] USFWS, National Wetlands Inventory, https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/. Accessed December 2, 2025.
[61] Los Angeles County, Significant Ecological Areas and Coastal Resource Areas Policy Map, https://planning.lacounty.gov/wp-content/uploads/2022/10/map_t02-seas.pdf. Accessed December 15, 2025.
[62] USFWS, National Wetlands Inventory.

wildlife species, or with established native resident or migratory wildlife corridors, and/or impede the use of native wildlife nursery sites. Therefore, the Project's potential impacts would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact. As discussed earlier, the Tree Evaluation for the Project Site found four street trees adjacent to the Project Site. The survey did not find any protected trees (listed in the City's Preservation of Protected Trees Ordinance No. 186873) on-site, nor within 50 feet of the Project Site.

As discussed in Threshold a) above, the two northern trees would be removed to accommodate the Project's new transformer yard and new entry drive. The two southern trees could be retained and preserved, but changes to the surrounding paving would be needed, as well as cautious protection during redevelopment.

The removal and replacement of street trees would be subject to the review and approval of the Board of Public Works, Urban Forestry Division. Prior to the issuance of any permit, a plot plan will be prepared indicating the location, size, type, and general condition of all existing trees on the site and within the adjacent public right(s)-of-way (see RCM-BIO-1 above). The Project would be required to comply with the Federal MBTA and Sections 3503, 3503.5, and 3513 of the California Fish and Game Code, which prohibit take of all birds and their active nests including raptors and other migratory nongame birds (see RCM-BIO-2 above). Additionally, in accordance with City regulations and subject to City approval, the Project would replace the two removed street trees at a 2:1 ratio or pay the applicable in-lieu fees.

Thus, the Project's potential impacts related to the conflict with local policies or ordinances protecting biological resources would be less than significant, and no mitigation measures are required.

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

No Impact. The Project Site is currently developed and located in an urbanized area of the City. As discussed above, there are no identified Significant Ecological Areas on the Project Site or within the vicinity of the Project Site,[63] and the Project Site is not subject to any Habitat Conservation Plans, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.[64] As such, 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 would occur, and no mitigation measures are required.

Cumulative Impacts

The Project Site is located in a highly urbanized area and does not serve as habitat for fish or wildlife species, as discussed above. In addition, no sensitive plant or animal community or special status species occur on the Project Site, no special-status wildlife or fish species are considered to have a moderate or

[63] Los Angeles County, Significant Ecological Areas and Coastal Resource Areas Policy Map, https://planning.lacounty.gov/wp-content/uploads/2022/10/map_t02-seas.pdf. Accessed December 15, 2025.

[64] CDFW, Natural Community Conservation Plans/Habitat Conservation https://wildlife.ca.gov/conservation/planning/nccp/plans. Accessed December 2, 2025.

high potential for occurrence in the Project Site area, the Project would not remove protected trees, and the Project would not conflict with the provisions of a habitat conservation plan, Natural Community Conservation Plan or other such plan. The Project would also be required to comply with the MBTA and state laws, which would reduce its potential impacts to migratory bird species. Thus, the Project would not interfere substantially with the movement of any native resident or migratory fish, wildlife species, or with established native resident or migratory wildlife corridors, and/or impede the use of native wildlife nursery sites.

In addition, as with the Project, the Related Projects would also be required to comply with the MBTA and other applicable biological resources regulations, as well as with CEQA and the City's mandatory compliance measures for those projects subject to CEQA review. Furthermore, to the extent that the Related Projects would result in significant impacts to biological resources, they would be required to implement mitigation to reduce/avoid the impacts. Thus, as the Project would not result in significant impacts to biological resources, the Project would not contribute considerably to cumulative biological resources impacts. As such, cumulative biological resources impacts would be less than significant.

4.5 CULTURAL RESOURCES

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

The following discussion regarding Cultural Resources is based, in part, on the *Historical Resources Technical Report, 525 S. Virgil Avenue, Los Angeles* (Historic Report), prepared by Historic Resources Group, dated November 2025, as well as the *Archaeological Resources Assessment for the 525 South Virgil Avenue Project in the City of Los Angeles, Los Angeles County, California* (Archaeology Report), prepared by Kimley-Horn, dated December 2025, both contained in **Appendix C**.

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

Less than Significant Impact.

Project Site

The Project would redevelop the Project Site with an approximately 252,873 sf, eight-story self-storage facility. The Project Site is currently occupied by a 56,072 sf vacant four-story office building and associated surface parking that would be demolished as part of the Project.

As evaluated in the Historic Report, the existing four-story commercial office building at 525 South Virgil Avenue was designed by Langdon & Wilson and constructed in 1965. It is Late Modern in style and four stories in height, with a rectangular plan, simple massing, and symmetrical composition on all four façades. It has a flat roof with wide, overhanging soffits and a central mechanical penthouse. As noted in the Historic Report, the Wilshire Community Plan Area (CPA) was surveyed by SurveyLA, the City of Los Angeles' citywide historic resources survey, between December 2013 and January 2015. SurveyLA identified 525 South Virgil Avenue as potentially eligible for listing in the National Register of Historic Places (National Register), the California Register of Historical Resources (California Register), and as a City of Los Angeles Historic-Cultural Monument (HCM) as an "excellent example of New Formalist commercial architecture in the Wilshire area; work of noted Los Angeles architectural firm Langdon and Wilson."

However, in 2019, the Project Site was re-evaluated for potential historic significance as part of environmental review for a previous project proposed for the Project Site. Following review of the additional information provided in the report, the City found that 525 South Virgil Avenue is not eligible under any relevant contexts and themes in the SurveyLA Historic Context Statement, and does not meet

the eligibility standards for designation for its architecture merit. The Historic Report reaffirms the conclusion that the building does not meet the eligibility requirements to be considered a historic resource. Therefore, the existing building is not a historical resource.

Historic Resources in the Vicinity

There are two potential historical resources in the vicinity of the Project: the mixed-use commercial building at 3101 West 6th Street, which is located approximately 140 feet southwest of the Project Site across Westmoreland Avenue, and the multi-family residential building at 523 South Westmoreland Avenue, which is located approximately 80 feet west of the Project Site across Westmoreland Avenue. (**Figure 8: Potential Historical Resources in the Vicinity of the Project Site**). These are described below:

- **3101 West 6th Street**: The mixed-use commercial building at 3101 West 6th Street is located at the northwest corner of 6th Street and Westmoreland Avenue. It is two stories in height and was constructed in 1924. It was identified as potentially eligible for listing at the state and local levels by SurveyLA as a "Rare intact example of early commercial development located along a former streetcar line in the Wilshire area; most examples from this period do not retain sufficient integrity. Due to alterations, including window replacement and limited window infill, the resource does not retain sufficient integrity for listing in the National Register."
- **523 South Westmoreland Avenue:** The multi-family residential building known as San Mar Manor at 523 South Westmoreland Avenue is located on the west side of Westmoreland Avenue, midblock between 5th and 6th Streets. It is four stories in height and was constructed in 1925. It was identified as potentially eligible for listing at the federal, state, and local levels by SurveyLA as an "Excellent example of a 1920s brick apartment house in the Wilshire area, exhibiting the essential characteristics of the type."

Although not officially listed, these two properties are conservatively considered historic for purposes of this analysis.

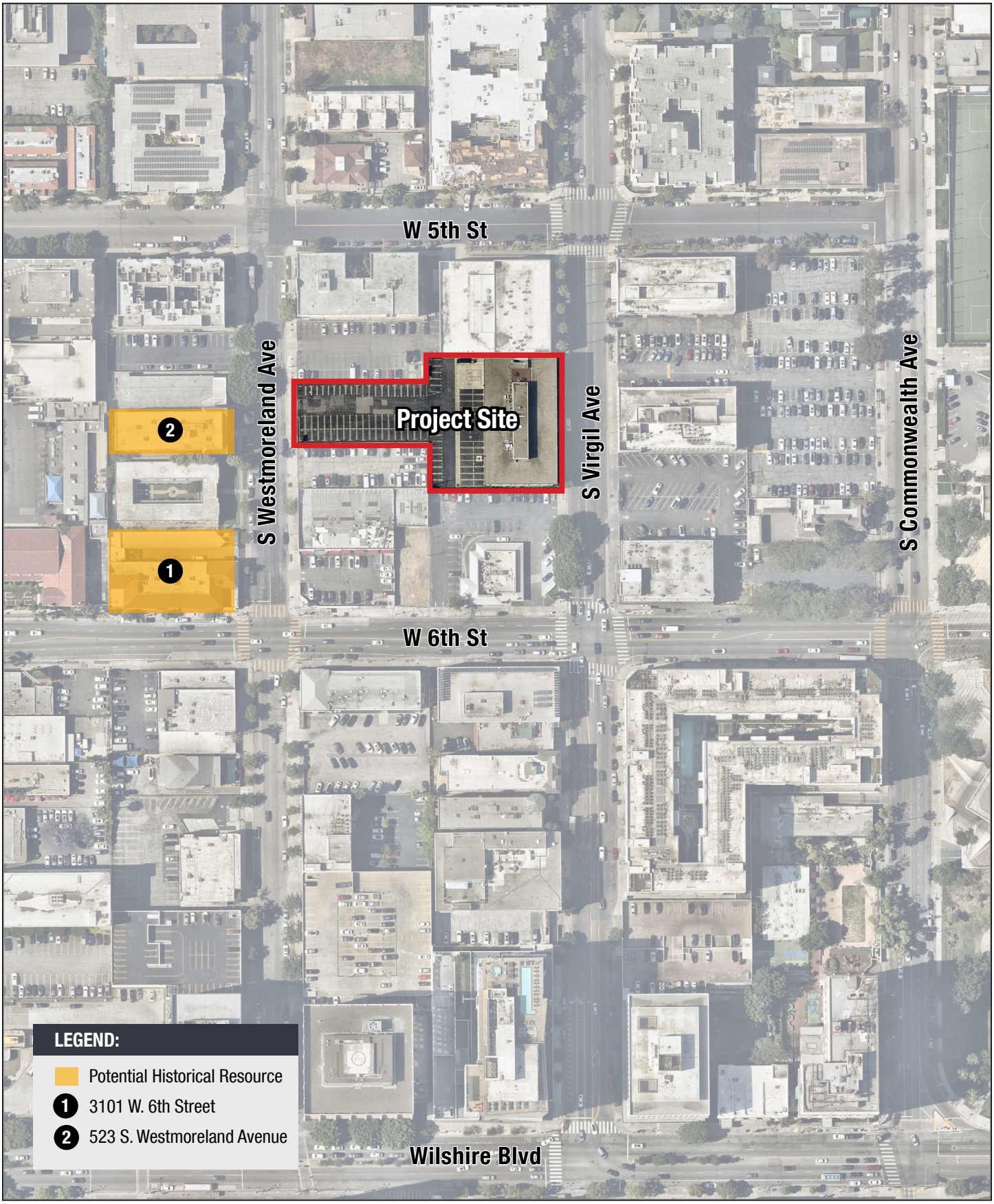
Direct Impacts Evaluation

525 South Virgil Avenue

As concluded in the Historic Report, the existing building on the Project Site is not a historical resource. Thus, its demolition would have no direct impact on a historical resource.

3101 West 6th Street

The Project would not materially alter the mixed-use commercial building at 3101 West 6th Street in any manner, and all of the essential physical features that convey its significance would remain intact. The mixed-use commercial building at 3101 West 6th Street is separated from the Project Site by South Westmoreland Avenue. The Project does not propose excavation for subterranean parking, and 3101 West 6th Street is separated from the Project Site to such an extent that there is no potential for Project construction activities, including demolition, excavation or other ground-disturbing activities, vibration, or soil settlement to de-stabilize the adjacent property. Therefore, the Project would not result in direct impacts to the historical resource at 3101 West 6th Avenue.



SOURCE: Nearmap, 2025

N.T.S.

FIGURE 8: Potential Historical Resources in the Vicinity of the Project Site

525 SOUTH VIRGIL AVENUE PROJECT

Kimley»Horn

523 South Westmoreland Avenue

The Project would not materially alter the multi-family residential building at 523 South Westmoreland Avenue in any manner, and all of the essential physical features that convey its significance would remain intact. The multi-family residential building at 523 South Westmoreland Avenue is separated from the Project Site by South Westmoreland Avenue. The Project does not propose excavation for subterranean parking, and 523 South Westmoreland Avenue is separated from the Project Site to such an extent that there is no potential for Project construction activities, including demolition, excavation or other ground-disturbing activities, vibration, or soil settlement to de-stabilize the adjacent property. Therefore, the Project would not result in direct impacts to the historical resource at 523 South Westmoreland Avenue.

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

Indirect Impacts

3101 West 6th Street

As evaluated in the Historic Report, the mixed-use commercial building at 3101 West 6th Street is significant as an intact example of commercial development located along a former streetcar line in the Wilshire area. Its significance is expressed through its physical features, which would not be altered or obscured by any component of the Project. 3101 West 6th Street is located across Westmoreland Avenue from the Project Site, facing toward the rear of the Project Site that is currently occupied by surface parking. The introduction of an eight-story self-storage building on the Project Site would not materially impair the mixed-use commercial building at 3101 West 6th Street such that it could no longer convey its significance. The surrounding area does not have a unified appearance, was developed over time, and the context surrounding 3101 West 6th Street has already been altered, including with the 1965 construction of the commercial office building that currently occupies the Project Site. The proposed new construction on the Project Site would not interrupt an otherwise cohesive commercial area, and although the new construction is taller than the existing building, it would not add significant height to the skyline.

According to the Commercial Development context developed by SurveyLA, the defining characteristic of streetcar commercial development is the building's relationship to the streetcar, and the eligibility standards acknowledge that changes in setting would not impact an intact example of streetcar-related commercial development from conveying its significance. The construction of the new building would not add significant height or density to the Project Site such that it would impact the setting of 3101 West 6th Street to the extent that its significance would be impaired. Following implementation of the Project, 3101 West 6th Street would retain its relationship with the street and proximity to the former Wilshire streetcar line. It would remain in its prominent corner location, and the primary, street-fronting façades would remain unobscured and visible to pedestrian traffic.

Therefore, the changes in setting resulting from the Project would not result in indirect impacts to the historical resource at 3101 West 6th Avenue, and impacts would be less than significant.

523 South Westmoreland Avenue

The multi-family residential building at 523 South Westmoreland Avenue is significant as an excellent example of a 1920s brick apartment house in the Wilshire area. Its significance is expressed through its physical features, which would not be altered or obscured by any component of the Project. 523 South

Westmoreland Avenue is located across Westmoreland Avenue from the Project Site, facing toward the rear of the Project Site that is currently occupied by surface parking. The introduction of an eight-story self-storage building on the Project Site would not materially impair the multi-family residential building such that it could no longer convey its significance. The surrounding area does not have a unified appearance, was developed over time, and the context surrounding 523 South Westmoreland Avenue has already been altered, including with the 1965 construction of the commercial office building that currently occupies the Project Site.

The proposed new construction on the Project Site would not interrupt an otherwise cohesive commercial or residential area, and although the new construction is taller than the existing building, it would not add significant height to the skyline.

According to the Multi-Family Residential Development context developed by SurveyLA, the apartment house is an important building type that proliferated throughout the City during most of the 20th century. Important characteristics of the apartment house are its height of two to six stories, design that maximizes lot coverage, and orientation to the street with architectural detailing on the front-facing façade. The eligibility standards acknowledge that changes in setting would not impact an intact example of an apartment house from conveying its significance. The construction of the Project would not add significant height or density to the Project Site such that it would impact the setting of 523 South Westmoreland Avenue to the extent that its significance would be impaired. Following construction of the Project, 523 South Westmoreland Avenue would retain all of its important character-defining features as a 1920s apartment house, including the overall design and siting to maximize the lot coverage, and the Tudor Revival architectural details on the primary, street-fronting façade.

Therefore, the changes in setting resulting from the Project would not result in indirect impacts to the historical resource at 523 South Westmoreland Avenue.

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

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

Less than Significant Impact. As part of the Archaeology Report, a Sacred Lands File (SLF) search request to the Native American Heritage Commission (NAHC) was sent on September 4, 2025. The NAHC provided the results on September 10, 2025. The results noted that there are no SLFs on file with the NAHC within or adjacent to the Project area.

Kimley-Horn conducted a cultural records search at the South Central Coastal Information Center (SCCIC) on September 10, 2025, to identify any previously recorded archaeological resources or previously conducted cultural resources studies within the Project area plus a half-mile radius. The results of the records search noted that one previous study (LA-05074) was conducted in the Project area. No cultural resources were recorded within the Project area or a half-mile radius during the study. There were 20 additional studies conducted within a half-mile radius. No cultural resources were identified in the Project area or a half-mile radius in the additional studies.

The Project area has a relatively low archaeological sensitivity. As such, no archaeological resources that meet the definition of "Historical Resources" or "Unique Archaeological Resources", as defined by CEQA, were identified within the Project area as a result of the Archaeology Report. Additionally, as discussed in the Archaeology Report, fill soils were encountered on the Project Site at approximately seven to 25 feet below ground surface (bgs), and the proposed maximum depth of excavation for the Project is approximately six to eight feet bgs, meaning excavation is expected to occur almost entirely in previously disturbed sediments (i.e., artificial fill layer). Therefore, it is unlikely that any archaeological resources will be inadvertently impacted during Project construction. Nonetheless, if any archaeology resources were discovered, however unlikely, the Project would comply with the City's condition of approval for inadvertent discovery of archaeological resources, which is set forth below. The condition of approval outlines the process for treatment of any archaeological resources and/or human remains inadvertently discovered during Project implementation. With such condition in place, impacts to archaeological resources would be less than significant, and no mitigation would be required.

Condition of Approval

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

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

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

Condition of Approval

Inadvertent Discovery of Human Remains. In the event that human skeletal remains are encountered at the project site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, pursuant to State Health and Safety Code Section 7050.5 which requires that no

further ground disturbance shall occur until the County Coroner has made the necessary findings as to the origin and disposition pursuant to California Public Resources Code Section 5097.98. In the event human skeletal remains are discovered during construction or during any ground disturbance activity, the following procedures shall be followed:

- Stop immediately and contact the County Coroner: 1104 N. Mission Road Los Angeles, CA 90033 323-343-0512 (8 a.m. to 5 p.m. Monday through Friday) or 323-343-0714 (After Hours, Saturday, Sunday, and Holidays).
- If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC).
- The NAHC will immediately notify the person it believes to be the most likely descendent of the deceased Native American.
- The most likely descendant has 48 hours to make recommendations to the Applicant, for the treatment or disposition, with proper dignity, of the human remains and grave goods.
- If the Applicant does not accept the descendant's recommendations, the owner or the descendant may request mediation by the NAHC.

Cumulative Impacts

As discussed above, the Project would have no significant direct or indirect impacts on historical resources on the Project Site or in the study area. As listed in **Table 37** and **Figure 9**, the City identified 14 Related Projects within an approximately 0.5-mile radius of the Project Site. As discussed in the Historic Report, two out of the 14 Related Projects have publicly available environmental documents: the mixed use project at 616 South Westmoreland Avenue and the mixed-use project at 550 South Shatto Place. Based on such publicly available environmental documents, neither of these two Related Projects identified potential direct or indirect impacts to historical resources on either respective project site or in the vicinity of either respective project site. Implementation of the Project in combination with the Related Projects represents the continued redevelopment and revitalization of the surrounding area. Changes in the setting of the historical resources in the vicinity of the Project and the Related Projects would not materially impair either of the potentially historical resources near the Project Site (3101 W. 6th Street and 523 S. Westmoreland Avenue) such that they would no longer convey their historic significance. Therefore, the Project's incremental contribution to a cumulative impact would not be considerable, and cumulative impacts to historical resources would be less than significant.

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

4.6 ENERGY

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

The following discussion regarding energy impacts is based, in part, on the *525 South Virgil Avenue Project, Los Angeles, CA – Energy Assessment* (Energy Report), prepared by Kimley Horn, dated September 2026 and contained in **Appendix D**.

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

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

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

The Project would comply with the applicable Energy Efficiency Standards provisions (Part 6) of Title 24 and the CALGreen Code (Part 11). The Project would comply with the current standards at the time of permit approval by the City. Those standards would be no less stringent than the 2025 Building Energy Efficiency Standards, which apply to all building permit applications on or after January 1, 2026.[65]

[65] California Energy Commission, 2025 Building Energy Efficiency Standards, https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2025-building-energy-efficiency. Accessed December 2025.

Construction

Project construction would consume energy in three general forms: (1) energy consumption associated with water use; (2) the fuel energy consumed by construction vehicles and equipment; and (3) bound energy in construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

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

The estimated total energy usage associated with Project construction is summarized below **in Table 9**: *Summary of Estimated Energy Use During Project Construction*, and in **Appendix D**.

Table 9: Summary of Estimated Energy Use During Project Construction

Source	Project Consumption	Los Angeles County Annual Energy Consumption	Percentage of Countywide Consumption
Electricity	**GWh**		
Water[1]	0.00040	64,896[5]	0.00000062%
Diesel	**Gallons**		
Construction Equipment[2]	43,091	518,097,421[6]	0.0083%
Haul and Vendor Trips[3]	50,459		0.0097%
Total	93,550		0.018%
Gasoline	**Gallons**		
Mobile Worker Trips [4]	22,969	3,285,951,375[6]	0.00070%

GWh = gigawatt-hours

1. Calculated based on the total gallons of water estimated to be used during soil disturbing activities and the CalEEMod default energy intensity per gallon of water for the South Coast Hydrologic Region.
2. Calculated based on CalEEMod GHG emissions outputs for construction equipment and conversion ratios from the Climate Registry.
3. Calculated based on CalEEMod GHG emissions outputs for haul and vendor trips and conversion ratios from the Climate Registry.
4. Calculated based on CalEEMod GHG emissions outputs for worker trips and conversion ratios from the Climate Registry.
5. Los Angeles County electricity usage in 2024 (most recent data available).
6. The anticipated Los Angeles County fuel usage in 2027 (the first construction year).

Source: California Energy Commission, Electricity Consumption, https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/california-energy-consumption-dashboards-0. Accessed September 14, 2025; California Air Resources Board, EMFAC2021, Emissions Inventory, 2022, https://arb.ca.gov/emfac/emissions-inventory/cd60f29daaedd924a75a9316202d7f56a9b573e5. Accessed September 14, 2025.
Refer to **Appendix D** for the energy calculations.

As shown in **Table 9**, the Project's construction-related electrical demand would be approximately 0.00040 GWh and would represent less than 0.01 percent of the electricity usage within the County. Therefore, it is anticipated that the existing and planned electricity capacity and electricity supplies would be sufficient to serve the Project's temporary construction electricity demand. As such, Project construction would not result in wasteful, inefficient, or unnecessary consumption of electrical resources.

Table 9 also shows Project construction is anticipated to consume approximately 93,550 gallons of diesel and approximately 22,969 gallons of gasoline, which would represent approximately 0.018 percent of diesel use and 0.0007 percent of gasoline use within the County. Based on the Project's relatively low fuel use during construction compared to the County's annual use, the Project would not substantially affect existing energy fuel supplies or resources. Project construction-related fuel use would be temporary, would fluctuate according to the construction phase, and would cease with construction. Furthermore, Project compliance with the latest engine efficiency emissions standards and CARB's construction equipment idling requirements would minimize unnecessary fuel consumption. These regulations require highly efficient combustion systems that maximize fuel efficiency and reduce unnecessary fuel consumption. Furthermore, increasing transportation costs and fuel prices incentivize contractors and owners to avoid wasteful, inefficient, and unnecessary consumption of energy during construction. As such, it is expected that existing and planned transportation fuel supplies would be sufficient to serve the Project's temporary construction demand, and Project construction would have a nominal effect on the local and regional energy supplies.

Substantial reductions in energy inputs for construction materials can be achieved by selecting building materials composed of recycled materials that require substantially less energy to produce than non-recycled materials. The incremental increase in the use of energy bound in construction materials such as asphalt, steel, concrete, pipes, and manufactured or processed materials (e.g., lumber and gas) would not substantially increase demand for energy compared to overall local and regional demand for construction materials. It is reasonable to assume that production of building materials such as concrete, steel, etc., would employ all reasonable energy conservation practices in the interest in minimizing the cost of doing business.

Therefore, Project construction would not result in inefficient, wasteful, or unnecessary energy consumption. Impacts would be less than significant, and no mitigation measures are required.

Operations

Energy consumption associated with Project operations would occur from building electricity use, water use, natural gas use, and transportation fuel use.

As shown below in **Table 10:** *Summary of Estimated Energy Consumption During Project Operation*, the Project's annual operational electrical demand would total approximately 1.62 GWh, which would account for less than 0.01 percent of the County's annual use. Project implementation would result in a negligible energy demand increase compared to the existing County demand. Additionally, LADWP would review the Project's estimated electricity consumption to ensure that the estimated power requirement would be accounted for in the total load growth forecast for their service area and planned growth of the power system. As such, it is anticipated that the existing and planned electricity capacity and supply would be sufficient to serve the Project's electricity demand. It is also noted that Project design and operations would be subject to compliance with the latest CALGreen Code and Energy Code, as applicable.

Table 10 also shows the Project would consume 0.0040 million therms of natural gas, which would account for less than 0.01 percent of the County's annual use. According to the United States Energy Information Administration, the United States currently has over 86 years of natural gas reserves based

on the 2021 supply and consumption rate.[66] As such, it is anticipated that the existing natural gas supply would be sufficient to serve the Project's natural gas demand. Further, as discussed above, the Project would be required to comply with energy conservation standards contained in CCR Title 24, the L.A. Green Building Code, and the CALGreen Code, as applicable. The L.A. Green Building Code, effective January 1, 2020, requires the use of numerous energy conservation measures beyond those required by CCR Title 24. The Project's estimated energy consumption does not take into account reductions that would be provided by adherence to the L.A. Green Building Code. Specifically, the Project would include energy efficient lighting fixtures, Energy Star®-rated appliances, low-flow water features, and energy efficient mechanical heating and ventilation systems. In addition, the Project would provide approximately three EV charging stations.

Table 10 also shows that the Project is anticipated to consume approximately 4,512 gallons of diesel and 44,367 gallons of gasoline. The Project's operational fuel use would represent approximately less than 0.01 percent of the diesel and gasoline use in the County. Diesel and gasoline are supplied by widely distributed service stations within and around the City. Based on current proven reserves, the global supply of crude oil, other liquid hydrocarbons, and biofuels is expected to be adequate to meet the world's demand for liquid fuels through 2050.[67] Therefore, the proposed Project would not result in a substantial demand for energy that would require expanded supplies or the construction of other infrastructure or expansion of existing facilities. Moreover, the Project would also include conservation measures and design features that would decrease its VMT and therefore its consumption of petroleum-based fuels (gasoline and diesel). Specifically, consistent with the 2024-2050 RTP/SCS alignment of transportation, land use, and housing strategies, the Project would encourage alternative modes of transit by providing bicycle parking spaces and convenient access to public transit, which would facilitate a reduction in VMT. The Project would also provide EV spaces and bicycle parking pursuant to the LAMC. Because of the Project Site's location near transit service, employees could take transit to their destinations or walk to commercial uses and other services nearby. The expected reduction in Project-related vehicle trips would decrease the Project's consumption of petroleum-based fuels.

Table 10: Summary of Estimated Energy Consumption During Project Operation

Source	Project Consumption	Los Angeles County Annual Energy Consumption	Percentage Increase Countywide Consumption
Electricity	**GWh**		
Building and Parking Lot[1]	1.23	64,896[5]	0.0019%
Water[2]	0.40		0.00061%
Total	1.62		0.0025%
Natural Gas	**Million Therms**		
Building[3]	0.0040	2,830[5]	0.00014%
Diesel	**Gallons**		
Mobile Trips[4]	4,512	517,191,839[6]	0.0009%
Gasoline	**Gallons**		
Mobile Trips[4]	44,367	3,217,179,804[6]	0.0014%

[66] U.S. Energy Information Administration, Frequently Asked Questions, How Much Natural Gas Does the United States Have, and How Long Will It Last?. 2024, https://www.eia.gov/tools/faqs/faq.php?id=58&t=8. Accessed October 22, 2025.

[67] United States Energy Information Administration, California State Energy Consumption Profile, 2025, https://www.eia.gov/state/print.php?sid=CA. Accessed October 22, 2025.

Source	Project Consumption	Los Angeles County Annual Energy Consumption	Percentage Increase Countywide Consumption
GWh = gigawatt-hours 1. Calculated based on CalEEMod defaults and Project-specific land use activity data. 2. Calculated based on an annual water usage estimate and CalEEMod default energy intensity per gallon of water for the South Coast Hydrologic Region. 3. Calculated based on CalEEMod defaults and Project-specific land use activity data. 4. Calculated based on default fleet mix and total VMT from CalEEMod and average fuel efficiency from the United States Department of Transportation. 5. Los Angeles County electricity and natural gas usage in 2024 (most recent data available). 6. The anticipated Los Angeles County fuel usage in 2028 (the first operational year).			
Source: California Energy Commission, California Energy Consumption Dashboards, https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/california-energy-consumption-dashboards. Accessed September 14, 2025; California Air Resources Board, EMFAC2021, Emissions Inventory, 2022, https://arb.ca.gov/emfac/emissions-inventory/cd60f29daaedd924a75a9316202d7f56a9b573e5. Accessed September 14, 2025. Refer to **Appendix D** for the energy calculations.			

Therefore, with regulatory compliance and incorporation of energy conservation features that would reduce the Project's electricity demand from that estimated herein, Project operation would not result in the wasteful, inefficient or unnecessary consumption of energy. Impacts would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact. As discussed below, the Project will not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Specifically, the Project is consistent with the CALGreen Code, the Energy Code, the LAGBC, the Green New Deal, and the 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy.

In accordance with the Project's compliance with the CALGreen Code, the Project would (a) divert 50 percent of its construction and demolition waste from landfills; (b) schedule mandatory inspections of its energy systems to ensure optimal working efficiency; (c) use only low pollutant-emitting exterior and interior finish materials, such as paints, carpets, vinyl flooring, and particle boards; and (d) include features ensuring a 20 percent reduction in indoor water use. Compliance with all of these mandatory measures would decrease the Project's consumption of electricity and petroleum-based fuels.

The Project would additionally comply with the latest Energy Code, CALGreen Code, LAGBC, Green New Deal, and the 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy, as applicable, which contain mandatory conservation policies. Such requirements include specific lighting requirements to conserve energy, window glazing to reflect heat, enhanced insulation to reduce heating and ventilation energy usage, and enhanced air filtration. The Project would incorporate these measures as required by code. The most recent Energy Code and CALGreen Code ensure that builders use the most energy efficient and energy conserving technologies and construction practices. Buildings (such as the Project) adhering to the latest Energy and CALGreen Code would be more energy efficient than buildings designed with prior codes, like the existing on-site improvements that were built in 1965. As such, the proposed Project would be more energy efficient than the existing on-site uses.

As discussed above, the Project's construction- and operation-related energy consumption would represent a fraction of the County's existing and projected energy consumption. Furthermore, the Project's electricity provider, LADWP, would be subject to the RPS program, which requires investor-owned utilities, electric service providers, and community choice aggregators to increase total

procurement from eligible renewable energy resources to 33 percent by 2020 and 50 percent by 2030. As noted above, SB 100 revised the goal of the program to achieve the 50 percent renewable resources target by December 31, 2026, and to achieve a 60 percent target by December 31, 2030. Renewable energy is generally defined as energy that comes from resources that are naturally replenished within a human timescale, such as sunlight, wind, tides, waves, and geothermal heat. The LADWP satisfies its renewable energy portfolio standards and consists of approximately 39.5 percent of renewable energy sources.[68]

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

The Project will comply with all applicable State and local energy efficiency standards, which would ensure that the Project would meet all applicable energy conservation policies and regulations. Therefore, the Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. Impacts would be less than significant, and no mitigation is required.

Cumulative Impacts

Electricity infrastructure is typically expanded in response to increasing demand, and system expansion and improvements by the LADWP are ongoing. As described in LADWP's 2022 Power Strategic Long-Term Resource Plan (2022), the LADWP would continue to expand delivery capacity as needed to meet demand increases within its service area at the lowest cost and risk consistent with LADWP's environmental priorities and reliability standards.[69] The Power Strategic Long-Term Resource Plan considers future energy demand, advances in renewable energy resources and technology, energy efficiency, conservation, and forecast changes in regulatory requirements. Development projects within LADWP's service area would also be anticipated to incorporate and/or fund site-specific infrastructure improvements, as necessary. Each of the Related Projects would be reviewed by LADWP to identify necessary power facilities and service connections to meet the needs of their respective projects. Related Project applicants would be required to provide for the needs of their individual projects, thereby contributing to the electrical infrastructure in the Project area. Moreover, like the Project, each Related Project would be required to pay development impact fees, as applicable, which the City could use for future infrastructure upgrades, as needed. As such, the Project's contribution to cumulative impacts with respect to electricity infrastructure would not be cumulatively considerable. Therefore, impacts would be less than significant, and no mitigation measures are required.

[68] California Energy Commission, 2023 Power Content Label, Los Angeles Department of Water and Power, https://www.energy.ca.gov/filebrowser/download/7275. Accessed October 22, 2025.

[69] Los Angeles Department of Water and Power, Power Strategic Long-Term Resource Plan, 2022, https://www.ladwp.com/sites/default/files/2023-08/2022%20LADWP%20Power%20Strategic%20Long-Term%20Resource%20Plan_0.pdf. Accessed October 22, 2025.

4.7 GEOLOGY AND SOILS

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

The following analysis of the Project's potential geology and soils impacts is based, in part, on the *Preliminary Geotechnical Engineering Investigation* (Geotechnical Report) prepared for the Project by Geotechnologies, Inc., dated July 17, 2025, and revised November 18, 2025, and contained in **Appendix E**.

The Project includes the demolition of an existing 56,072 sf vacant office four-story building and its associated parking lot and the construction of an approximately 252,873 sf, eight-story self-storage building and ground-level parking. It also includes a request for a Haul Route approval and proposes the

cut and export of 5,600 cubic yards of soil (7,280 with a 30-percent swell factor applied).[70] A Geology and Soils Report Approval Letter, Log No. 138654, for the subject property, which details conditions of approval for the construction of the project and for any haul route applications, was issued by LADBS on January 2, 2026. The following discussion regarding paleontological resources is based, in part, on the *Paleontological Resources Assessment for the 525 South Virgil Avenue Project in the City of Los Angeles, Los Angeles County, California* (Paleontological Report) prepared by Kimley-Horn, dated November 2025 and contained in **Appendix C**.

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

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

Less Than Significant. Fault rupture occurs when movement on a fault deep within the earth breaks through to the surface. According to the Geotechnical Report, faults may be categorized as Holocene-active, Pre-Holocene faults, and Age-undetermined faults. Holocene-active faults are those which show evidence of surface displacement within the last 11,700 years. Pre-Holocene faults are those that have not moved in the past 11,700 years. Age-undetermined faults are faults where the recency of fault movement has not been determined.

Buried thrust faults are faults without a surface expression but are a significant source of seismic activity. They are typically broadly defined based on the analysis of seismic wave recordings of hundreds of small and large earthquakes in the southern California area. Due to the buried nature of these thrust faults, their existence is usually not known until they produce an earthquake. The risk for surface rupture potential of these buried thrust faults is inferred to be low. However, the seismic risk of these buried structures in terms of recurrence and maximum potential magnitude is not well established.

The California Geological Survey establishes regulatory zones around active faults, called Alquist-Priolo Earthquake Fault Zones (previously called Special Study Zones).[71] These zones, which extend from 200 to 500 feet on each side of the known fault, identify areas where a potential surface fault rupture could prove hazardous for buildings used for human occupancy. Development projects located within an Alquist-Priolo Earthquake Fault Zone are required to prepare special geotechnical studies to characterize hazards from any potential surface ruptures. In addition, the City designates Fault Rupture Study Areas along the sides of active and potentially active faults to establish areas of potential hazard due to fault rupture.

As described in the Geotechnical Report, the Project Site is not located within the Alquist-Priolo Earthquake Fault Zone, and thus the potential for surface ground rupture at the Project Site is considered low. Moreover, the Project would not contain uses or activities, such as mining operations or deep excavation into the earth, that would exacerbate the activity of a known earthquake fault. As such, the Project would not directly or indirectly cause or exacerbate potential substantial adverse effects, including

[70] See Appendix E for Memorandum dated September 8, 2026 regarding the bulking factor of the Project Site.

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

the risk of loss, injury, or death, related to rupture of a known earthquake fault. Impacts are less than significant, and no mitigation measures are required.

ii) Strong seismic ground shaking?

Less than Significant Impact. The entire Southern California region is susceptible to strong ground shaking from severe earthquakes. Strong ground motion occurs as energy is released during an earthquake. The intensity of ground motion is dependent upon the distance to the fault rupture, the earthquake magnitude, and the geologic conditions underlying and surrounding the Project Site. According to the Geotechnical Report, no known Holocene-active or Pre-Holocene faults underlie the Project Site.

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

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

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

LADBS as part of the building permit process. The Project would be required through regulatory compliance to incorporate the recommendations of the Project's geotechnical engineer contained within the Geotechnical Report and with all of the conditions issued by LADBS as part of their required review and approval, which would account for seismic calculations from probabilistic seismic hazard modeling for the Project Site.

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

iii) Seismic-related ground failure, including liquefaction?

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

As noted in the Geotechnical Report, the Project Site is not classified as part of the potentially "Liquefiable" area within the Earthquake Zones of Required Investigation for Hollywood 7.5-Minute Quadrangle. This determination is based on groundwater depth records, soil type, and distance to a fault capable of producing a substantial earthquake.

Preparation of the Geotechnical Report included the excavation of two exploratory borings on the Project Site to a depth of 30 feet below the existing site grade. Groundwater seepage was encountered in exploratory borings at depths ranging from 25 to 29½ feet below grade. As noted in the Geotechnical Report, the historically highest groundwater level is on the order of 20 feet below site grade based on review of the California Geological Survey Seismic Hazard Evaluation Report of Hollywood Quadrangle. Project construction is estimated to require excavation to depths of approximately six to eight feet below grade, and therefore the chance of encountering groundwater during construction is low.

Fill materials to a depth of six feet were encountered in both exploratory borings. The Project Site's existing fill materials consists of sandy silt to silty clay. Fill materials are underlain by Older Alluvium, consisting of clayey silt and silty clay, silty sand, sand, and gravelly sand. Bedrock was encountered in both exploratory borings at approximately 25 feet below the existing site grade. The bedrock consists of siltstone. As determined in the Geotechnical Report, based on the stiff and dense to very dense nature of older alluvium, and presence of relatively shallow bedrock, the potential for liquefaction occurring at the Project Site is considered to be remote.

Additionally, pursuant to LAMC Section 91.7006.2, the final Geotechnical Report for the Project will be reviewed and approved by LADBS as part of the City's ministerial process for issuing grading and building permits. Review and approval of the Geotechnical Report and design considerations by LADBS would ensure that development of the Project Site would occur in compliance with building safety requirements, including the California Building Code and the LAMC.

As such, the Project would not directly or indirectly cause or exacerbate potential substantial adverse effects, including the risk of loss, injury, or death, related to seismic-related ground failure, including

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

iv) Landslides?

No Impact. A landslide is defined as the movement of a mass of rock, debris, or earth down a slope. Landslides are a type of "mass wasting," which denotes any down-slope movement of soil and rock under the direct influence of gravity.[72] As noted in the Geotechnical Report, the Project Site is not located in an area prone to earthquake triggered landslides due to the relatively low relief in the area and preponderance of development covered land. As such, the Project would not directly or indirectly cause or exacerbate potential substantial adverse effects, including the risk of loss, injury, or death, related to landslides. No impact would occur, and no mitigation is required.

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

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

Following the completion of construction, the potential for erosion would be relatively low since the Project Site would be largely impervious and the Project would be required to comply with the City's LID Ordinance (Ordinance No. 183,833) and implement standard erosion controls to limit stormwater runoff, which can contribute to erosion. With compliance with applicable regulations, impacts regarding wind or waterborne erosion during construction and operation of the Project would be less than significant.

Therefore, the Project would not directly or indirectly cause potential substantial impacts related to soil erosion or the loss of topsoil. Impacts would be less than significant, and no mitigation is required.

[72] USGS, What is a landslide and what causes one? https://www.usgs.gov/faqs/what-a-landslide-and-what-causes-one. Accessed December 18, 2025.

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

Less than Significant Impact. As detailed above, the Project would not result in loss, injury, or death related to landslide or liquefaction. Because lateral spreading is the lateral movement of soils that have undergone liquefaction, the Project would, accordingly, not result in lateral spreading.

The probability of seismically-induced landslides occurring on the Project is considered to be low due to the relatively small elevation change across the Project Site. Per the Geotechnical Report, the Project Site has an elevation of 274 feet near the central portion of the Project Site and a lower site elevation of 268.5 feet at the southeast corner of the Project Site, corresponding to a 5.5 foot elevation change.

Additionally, per the Geotechnical Report, the Project Site is not located within an area designated as "Earthquake Induced Landslide Zone" based on review of the Earthquake Zones of Required Investigation for Hollywood 7.5-Minute Quadrangle. Based on these considerations, the potential of landslides negatively affecting Project Site is considered to be low.

As previously discussed, compliance with the City Building Code includes incorporation of the Project Site- and Project-specific design requirements for soil stability established in the Geotechnical Report that would be reviewed and approved by LADBS. The Project would be required through regulatory compliance to incorporate the recommendations of the Project's geotechnical engineer contained within the Geotechnical Report and with all of the conditions issued by LADBS per their review, which would account for slope stability at the Project Site.

Therefore, the Project Site is not located on a geologic unit or soil that is unstable or that would become unstable as a result of the Project and potentially result in collapse. As such, the Project would not exacerbate existing conditions such as unstable geologic units or unstable soil. Therefore, impacts would be less than significant, and no mitigation measures would be required.

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

Less Than Significant Impact. Expansion and contraction of volume can occur when expansive soils undergo alternating cycles of wetting (swelling) and drying (shrinking). During these cycles, the volume of the soil changes markedly and can cause structural damage to buildings and infrastructure. The Geotechnical Report determined that the onsite geologic materials are in the high expansion range.

The Geotechnical Report included recommendations to reduce potential risks for expansive soil action, which would be subject to review and approval by LADBS. Additionally, the Project would be required to comply with the City of Los Angeles Uniform Building Code, the LAMC, and other applicable building codes, which include building foundation requirements appropriate to Site-specific conditions, such as expansion potential. The Project would be required through regulatory compliance to incorporate the recommendations of the Project's geotechnical engineer contained within the Geotechnical Report and with all of the conditions issued by LADBS (pursuant to LAMC Section 91.7006.2). As such, the Project would not risk life or property resulting from expansive soil. Therefore, impacts would be less than significant, and no mitigation measures would be necessary**.**

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

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

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

Less than Significant Impact. As part of the Paleontological Report, Kimley-Horn reviewed geologic maps, soil maps, geotechnical data, and literature to determine the paleontological sensitivity of the Project Site. Kimley-Horn conducted paleontological record searches for the Project area and surrounding region through the Natural History Museum of Los Angeles County (NHMLAC) and the Western Science Center (WSC). The NHMLAC responded on September 7, 2025, and the WSC responded on November 5, 2025. The results of the record searches were negative for known specimens within the Project area. While there are no known fossil localities that lie directly within the Project area, the NHMLAC cited positive findings in nearby sediments of the same composition.

It is important to note that the management of paleontological records is not delineated based on geographical region and, as such, there is no single repository or specific group of repositories responsible for the management of paleontological records within Los Angeles County. However, given the close proximity of NHMLAC to the Project area and their long operating history in the region and emphasis on paleontological resource management, it is likely that a higher percentage of records for the vicinity of the Project Site are held at this location. As such, the results in the Paleontological Report are generally considered a strong sample of fossil localities for the region.

The Paleontological Resources Assessment did not identify any paleontological resources within the Project Site or surrounding area. However, the age and composition of soils and sediments across the Project Site, combined with the knowledge of paleontological resources identified within similar sediment deposits nearby, indicate a moderate-to-high sensitivity for paleontological resources below approximately seven feet bgs. Specifically, the layer of Pleistocene-age alluvium that begins at approximately seven feet bgs has a moderate sensitivity for paleontological resources. The Miocene-age Puente Formation that begins at approximately 25 feet bgs has a high sensitivity for paleontological resources. As the Project Site has been developed in the past, it is likely that any fossil-bearing soils near the surface have been disturbed and that no paleontological resources, if present, have remained intact. However, as some discoveries were found in extremely deep sediments, the likelihood of intact paleontological resources, which would be considered scientifically significant if discovered, being present within deeper sediments remains high. Given that the proposed maximum depth of excavation for the Project is approximately six to eight feet bgs, excavation is expected to occur almost entirely in previously disturbed sediments (i.e., artificial fill layer), which have a low paleontological sensitivity.

Given the paleontological sensitivity begins in the deeper sediments after the artificial fill layer, it is unlikely that any paleontological resources will be inadvertently impacted during Project implementation.

However, it is possible that paleontological resources could be inadvertently impacted during Project implementation.

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

Overall, with adherence to the City's condition of approval, the Project would not directly or indirectly destroy a unique paleontological resource. Impacts would be less than significant, and no mitigation measures would be required.

With regard to a unique geologic feature, the Project Site is currently completely developed with one building and surface parking and there are no unique geologic features on the Project Site. Therefore, the Project would not directly or indirectly destroy a unique geologic feature. Therefore, impacts would be less than significant, and no mitigation measures would be required.

Cumulative Impacts

Due to their site-specific nature, geology and soils impacts are typically assessed on a project-by-project basis or for a particular localized area. As analyzed above, the Project's impacts to geology and soils would be less than significant. As with the Project, the Related Projects would address site-specific geologic hazards through the implementation of site-specific geotechnical recommendations and/or mitigation measures. While cumulative development could expose a greater number of people to seismic hazards, as with the Project, the Related Projects would be subject to local, state, and federal regulations and standards for seismic safety. Moreover, the Related Projects are all separated from the Project Site by roadways and/or intervening development and none are located in such close proximity so as to reasonably be expected to cumulatively exacerbate any geological hazards. Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative impacts to geology and soils would be less than significant.

With regard to paleontological resources, the Related Projects, like the Project, would be required to comply with existing regulatory requirements that would ensure impacts related to paleontological resources would be less than significant. Additionally, as noted above, the distance between the Project Site and the Related Projects is such that cumulative effects on the same paleontological resource could not reasonably be expected. Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative impacts to paleontological resources and would be less than significant.

4.8 GREENHOUSE GAS EMISSIONS

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

The analysis is based on the information provided in the Greenhouse Gas Impact Assessment, 525 South Virgil Avenue Project, prepared by Kimley-Horn, dated September 2026 and contained in **Appendix F**.

Background

Certain gases in the Earth's atmosphere classified as greenhouse gases (GHGs) play a critical role in determining the Earth's surface temperature. Solar radiation enters the Earth's atmosphere from space. A portion of the radiation is absorbed by the Earth's surface and a smaller portion of this radiation is reflected back toward space. This absorbed radiation is then emitted from the earth as low-frequency infrared radiation. The frequencies at which bodies emit radiation are proportional to temperature. Because the Earth has a much lower temperature than the sun, it emits lower-frequency radiation. Most solar radiation passes through GHGs; however, infrared radiation is absorbed by these gases. As a result, radiation that otherwise would have escaped back into space is instead "trapped," resulting in a warming of the atmosphere. This phenomenon, known as and contribute to the greenhouse effect, which is responsible for maintaining a habitable climate on Earth. The primary GHGs contributing to the greenhouse effect are carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O). Fluorinated gases also make up a small fraction of the GHGs that contribute to climate change.[73] Examples of fluorinated gases include chlorofluorocarbons (CFCs), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), and nitrogen trifluoride (NF_3); however, it is noted that these gases are usually associated with refrigerants, aerosol propellants, foam blowing agents, solvents, fire retardants, and a variety of industrial processes such as aluminum and semiconductor manufacturing and not with typical land use development.[74] Human-caused emissions of GHGs exceeding natural ambient concentrations are believed to be responsible for intensifying the greenhouse effect and leading to a trend of unnatural warming of the Earth's climate, known as global climate change or global warming.

GHGs are global pollutants, unlike criteria air pollutants and toxic air contaminants (TACs), which are pollutants of regional and local concern. Whereas pollutants with localized air quality effects have relatively short atmospheric lifetimes (about one day), GHGs have long atmospheric lifetimes (one to

[73] United States Environmental Protection Agency, Overview of Greenhouse Gases, 2025, https://www.epa.gov/ghgemissions/overview-greenhouse-gases. Accessed November 25, 2025.

[74] United States Environmental Protection Agency, Fluorinated Gas Emissions, https://www.epa.gov/ghgemissions/fluorinated-gas-emissions#sources. Accessed November 25, 2025.

several thousand years). GHGs persist in the atmosphere for long enough time periods to be dispersed around the globe. Although the exact lifetime of a GHG molecule is dependent on multiple variables and cannot be pinpointed, consistently since the late 19th century, more CO_2 has been emitted into the atmosphere than is sequestered by ocean uptake, vegetation, or other forms of carbon sequestration. Of the total annual human-caused CO_2 emissions, approximately 55 percent is sequestered through ocean and land uptakes every year, averaged over the last 50 years, whereas the remaining 45 percent of human-caused CO_2 emissions remains stored in the atmosphere.[75]

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

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

Less Than Significant Impact.

Regulations and Significance Criteria

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

Assembly Bill (AB) 32 Statutes of 2006, Health and Safety Code Section 38500 et seq. require that CARB determine what the Statewide GHG emissions level was in 1990 and approve a Statewide GHG emissions limit that is equivalent to that level, to be achieved by 2020. CARB determined that achieving the 1990 emissions level would require a reduction of GHG emissions of approximately 29 percent below what would otherwise occur in 2020 in the absence of new laws and regulations (referred to as "business-as-usual" [BAU]).[76] Additionally, Executive Order B-30-15 requires Statewide GHG emissions to be reduced by 40 percent below 1990 levels by 2030.

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

[75] Intergovernmental Panel on Climate Change, Climate Change 2013: The Physical Science Basis, page 467, 2013, https://www.ipcc.ch/site/assets/uploads/2018/02/WG1AR5_all_final.pdf. Accessed October 21, 2025.

[76] CARB defines BAU in its Scoping Plan as emissions levels that would occur if California continued to grow and add new GHG emissions but did not adopt any measures to reduce emissions. Projections for each emission-generating sector were compiled and used to estimate emissions for 2020 based on 2002–2004 emissions intensities. Under CARB's definition of BAU, new growth is assumed to have the same carbon intensities as was typical from 2002 through 2004.

Additionally, signed into law in September 2018, SB 100 increased California's renewable electricity portfolio from 50 to 60 percent by 2030. SB 100 also established a further goal to have an electric grid that is entirely powered by clean energy by 2045. Addressing GHG emissions generation impacts under CEQA requires an agency to determine what constitutes a significant impact. The amendments to the State CEQA Guidelines specifically allow lead agencies to determine thresholds of significance that illustrate the extent of the potential impact, which in turn provides the basis to assess and, if required to address significant impacts, to apply mitigation measures.[77] This means that each agency is left to determine whether a project's GHG emissions will have a "significant" impact on the environment and to support that determination with substantial evidence in the record. Regardless of the manner in which an agency determines the significance of GHG emissions impacts in accordance with CEQA, the State CEQA Guidelines direct that agencies are to use "careful judgment" and "make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate" the project's GHG emissio.[78]

Lead agencies quantify GHG emissions of projects and consider several factors when determining the significance of GHG emissions from a project: the extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting; whether the project exceeds an applicable significance threshold; and the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional or local plan for the reduction or mitigation of GHG emissions. CCR Section 15064.4 does not establish a threshold of significance; rather, lead agencies are granted discretion to establish significance thresholds for their respective jurisdictions and for individual projects, including by using thresholds developed by other public agencies, or suggested by other experts, such as the California Air Pollution Control Officers Association (CAPCOA), as long as any threshold chosen is supported by substantial evidence (see State CEQA Guidelines Section 15064.7(c)).

The City has not adopted a numeric threshold for the analysis of GHG impacts. Rather, State CEQA Guidelines Section 15064.4(b)(3) allows a lead agency to make a finding of non-significance for GHG emissions if a project complies with adopted programs, plans, policies, and/or other regulatory strategies to reduce GHG emissions. Accordingly, the threshold of significance applied here is whether the Project complies with applicable plans, policies, regulations, and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. Nonetheless, the Project's estimated quantitative emissions are also included below for informational purposes.

Quantitative GHG Emissions

Construction of the Project would result in direct emissions of GHGs from construction equipment and the transport of materials and construction workers to and from the Project Site. SCAQMD recommends that construction emissions be amortized over a 30-year project lifetime.[79] Thus, the Project's total construction GHG emissions were divided by 30 to determine an estimate of annual construction emissions comparable to operational emissions.

---

[77] California Governor's Office of Planning and Research, Proposed Updates to the CEQA Guidelines – Final, page 84, 2017, https://lci.ca.gov/ceqa/docs/20171127_Comprehensive_CEQA_Guidelines_Package_Nov_2017.pdf. Accessed December 1, 2025.

[78] 14 California Code of Regulations, § 15064.4a.

[79] SCAQMD, Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans, page 5, 2008, https://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgboardsynopsis.pdf. Accessed December 1, 2025.

Total GHG emissions generated during all phases of construction were combined and are presented in **Table 11:** *Construction Greenhouse Gas Emissions*. The CalEEMod outputs are contained within **Appendix F**. As shown in **Table 11**, Project construction would result in a total of 1,145 $MTCO_2e$ (approximately 38 $MTCO_2e$/year when amortized over 30 years).

Table 11: Construction Greenhouse Gas Emissions

Construction	$MTCO_2e$
Construction Year 1 (2027)	438
Construction Year 2 (2028)	714
Total Construction Emissions	1,152
30-Year Amortized Annual Construction	38
Source: CalEEMod version 2022. Refer to **Appendix F** for model data outputs.	

Operational or long-term emissions would occur over the life of the Project. Operational GHG emissions would result from direct sources, such as Project-generated vehicular traffic, natural gas combustion, and area source usage (consumer products, architectural coatings, and landscape maintenance equipment). Operational GHG emissions would also result from indirect sources, such as electrical power generation, water supply and wastewater treatment, solid waste generation, and fugitive refrigerants from air conditioning or refrigerators. **Table 12:** *Total Project Greenhouse Gas Emissions*, summarizes the total GHG emissions (both amortized construction and operations) associated with the proposed Project. As shown, the Project would generate approximately 1,281 $MTCO_2e$/year, not accounting for the existing emissions generated by the existing use to be demolished.

Table 12: Total Project Greenhouse Gas Emissions

Emissions Source	$MTCO_2e$ per Year
Construction Amortized over 30 Years	38
Area Source	5
Energy	599
Mobile	349
Waste	74
Water & Wastewater	205
Refrigerant	11
Total Project Emissions[1]	**1,281**
1. Totals may be slightly off due to rounding.	
Source: CalEEMod version 2022. Refer to **Appendix F** for model data outputs.	

Greenhouse Gas Reduction Plan Compliance

As mentioned above, in the absence of any adopted quantitative threshold, the significance of the Project's GHG emissions is evaluated consistent with State CEQA Guidelines Section 15064.4(b)(3) by considering whether the Project complies with applicable plans, policies, regulations, and requirements adopted for the purpose of reducing the emissions of GHGs. Specifically, this analysis evaluates the Project's compliance with state (the 2022 Scoping Plan), regional (SCAG's 2024-2050 RTP/SCS), and local (the Green New Deal and Los Angeles Green Building Code) plans.

CARB 2022 Scoping Plan

As previously noted, the 2022 Scoping Plan sets a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions to 85 percent below 1990 levels by 2045 in accordance with AB 1279.[80] The State's largest GHG contributors are the transportation, industrial, and electricity sectors.[81] The 2022 Scoping Plan intends to achieve the AB 1279 targets primarily through zero-emission transportation (e.g., electrifying cars, buses, trains, and trucks). The Project would be required to comply with applicable current and future regulatory requirements promulgated through the 2022 Scoping Plan.

Statewide strategies to reduce GHG emissions in the latest 2022 Scoping Plan include implementing SB 100, which would achieve 100 percent clean electricity by 2045; achieving 100 percent ZEV sales in 2035 through ACC II[82]; and implementing the ACF[83] to deploy ZEV buses and trucks. Additional transportation policies include the Off-Road Zero-Emission Targeted Manufacturer rule, Clean Off-Road Fleet Recognition Program, In-use Off-Road Diesel-Fueled Fleets Regulation, Off-Road Zero-Emission Targeted Manufacturer rule, Clean Off-Road Fleet Recognition Program, and Amendments to the In-use Off-Road Diesel-Fueled Fleets Regulation. The 2022 Scoping Plan would continue to implement SB 375. GHGs would be further reduced through the Cap-and-Trade Program carbon pricing and SB 905. SB 905 requires CARB to create the Carbon Capture, Removal, Utilization, and Storage Program to evaluate, demonstrate, and regulate carbon dioxide removal projects and technology.

As indicated in **Table 12**, approximately 74 percent of the Project's GHG emissions are from energy and mobile sources, which would be reduced by the 2022 Scoping Plan measures described above. The City has no control over vehicle emissions (approximately 27 percent of the Project's total emissions). However, these emissions would decline in the future due to Statewide measures, as well as cleaner technology and fleet turnover. Furthermore, the Project would not obstruct or interfere with efforts to increase ZEVs or State efforts to improve system efficiency. The Project will also provide EV and bicycle parking spaces and it is located in close proximity to numerous public transit options, which would further encourage the reduction of mobile emissions. Compliance with applicable State standards (e.g., continuation of the Cap-and-Trade regulation; CARB's Mobile Source Strategy, and Sustainable Freight Action Plan; EO N-79-20; SB 100 [renewable electricity portfolio improvements that require 60 percent renewable electricity by 2030 and 100 percent renewable by 2045]; etc.) would ensure consistency with State and regional GHG reduction planning efforts. The Project would additionally comply, as applicable, with the Energy Code and CALGreen Code, which require energy conservation features in new construction (e.g., high-efficiency lighting, high-efficiency HVAC systems, thermal insulation, double-glazed windows, and water conserving plumbing fixtures). Conserving energy usage would indirectly regulate and reduce GHG emissions.

---

80 CARB, 2022 Scoping Plan Documents, https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/2022-scoping-plan-documents. Accessed December 1, 2025.

81 CARB, Current California GHG Emissions Inventory Data, 2025, https://ww2.arb.ca.gov/ghg-inventory-data. Accessed December 1, 2025.

82 On May 22, 2025, the United States Senate voted to revoke the waiver granted by the Biden administration for the ACC II program. On June 12, 2025, the Trump Administration formally nullified the ACC II program. Pursuant to CARB's Emergency Vehicle Emissions Regulation (adopted October 2, 2025), certain antecedent regulations (displaced by ACC II and Omnibus) remain operative (as previously adopted) with the caveat that CARB may enforce ACC II and Omnibus, to the extent permitted by law, in the event a court of law holds invalid the resolution purporting to disapprove those waivers.

83 On January 13, 2025, CARB withdrew their requests for Federal CAA waivers from the U.S. EPA needed to support the ACF Regulations. As such, implementation of the ACF is currently unknown.

The Project would not obstruct or interfere with the State's progress towards carbon neutrality under the 2022 Scoping Plan. The Project would not convert any NWL and/or decrease the State's urban forest carbon stock, which are areas of emphasis in the 2022 Scoping Plan. Furthermore, the Project would develop land uses that would potentially reduce VMT and associated GHG emissions.[84] As such, the Project would not conflict with the 2022 Scoping Plan and impacts would be less than significant. No mitigation is required.

Regional Transportation Plan/Sustainable Communities Strategy Consistency

Under SB 375, SCAG's 2024-2050 RTP/SCS establishes GHG emissions goals to reduce GHG emissions in the region by eight percent from 2005 levels by 2020 and 19 percent below 2005 levels by 2035.[85] RTP/SCS is a long-range vision plan that balances future mobility and housing needs with economic, environmental, and public health goals.

SCAG plays a critical role in project selection, programming, and administration of federal funds available to the region. The RTP/SCS invests $751.7 billion in the transportation system, primarily in operations and maintenance, to ensure the continued performance of the entire current transportation network.[86] Implementation of the 2024-2050 RTP/SCS would add 181,200 new miles of transit revenue service, 4,000 new miles of bike lanes, and 869 new miles to the Regional Express Lane Network.[87] Strategic investments in infrastructure and transportation would improve access to employment centers and stimulate regional economic growth and opportunity in historically underserved areas. The 2024-2050 RTP/SCS is an important planning document for the region, allowing public agencies to implement transportation projects in a coordinated manner while qualifying for federal and state funding. The 2024-2050 RTP/SCS also supports local jurisdictions in making informed land use planning and housing development decisions that promote the key goals of the plan to reduce VMT and GHG emissions.

The 2024-2050 RTP/SCS accounts for operations and maintenance costs to ensure reliability, longevity, and cost effectiveness of the existing transportation system. The 2024-2050 RTP/SCS is also supported by a combination of transportation and land use strategies that help the region achieve State GHG emissions reduction goals, Federal CAA requirements, increased housing production, improved equity and resilience, the preservation of natural lands, improvement of public health, increased transportation safety, support for the region's vital goods movement industries and more efficient use of resources. The majority of GHG emissions associated with new development consists of mobile sources[88], and therefore an analysis of the Project's compatibility with the RTP/SCS is an appropriate indicator of whether the Project would inhibit the post-2020 GHG reduction goals promulgated by the State. The Project's consistency with the relevant goals of the 2024-2050 RTP/SCS is analyzed in detail in **Table 13:** *2024 Regional Transportation Plan/Sustainable Communities Strategy Consistency*. As shown in **Table 13**, many RTP/SCS strategies are not directly applicable to the proposed Project. Nonetheless, the proposed Project

[84] California Air Pollution Control Officers Association, Quantifying Greenhouse Gas Mitigation Measures, page 160, 2010, https://www.aqmd.gov/docs/default-source/ceqa/handbook/capcoa-quantifying-greenhouse-gas-mitigation-measures.pdf. Accessed December 1, 2025. The CAPCOA identifies that infill developments, such as the proposed Project, reduce VMT which reduces fuel consumption and associated GHG emissions.

[85] SCAG, Connect SoCal (2024 – 2050 Regional Transportation Plan/Sustainable Communities Strategy), page 97, 2024, https://www.scag.ca.gov/sites/default/files/2024-05/23-2987-connect-socal-2024-final-complete-040424.pdf. Accessed December 1, 2025.

[86] SCAG, Connect SoCal (2024 – 2050 Regional Transportation Plan/Sustainable Communities Strategy), page 12, 2024.

[87] SCAG, Connect SoCal (2024 – 2050 Regional Transportation Plan/Sustainable Communities Strategy), page 12, 2024.

[88] CARB, Current California GHG Emissions Inventory Data, 2025, https://ww2.arb.ca.gov/ghg-inventory-data. Accessed December 1, 2025.

would not conflict with implementation of any of the strategies of the RTP/SCS. Therefore, the proposed Project would not result in any significant impacts or interfere with SCAG's ability to achieve the region's mobile source GHG reduction targets.

Table 13: 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy Consistency

SCAG Goals	Project Consistency Analysis
Mobility: Build and maintain an integrated multimodal transportation network.	
Support investments that are well-maintained and operated, coordinated, resilient and result in improved safety, improved air quality and minimized greenhouse gas emissions.	**No Conflict.** While this measure is to be taken at the regional level, Project implementation would not conflict with its implementation. The Project would support improved air quality and would minimize GHG emissions by locating a new self-storage use in an infill location next to existing transit, services, and complimentary land uses. The Project would comply, as applicable, with the Green Building Code, which requires the use of numerous conservation measures, beyond those required by Title 24 of the California Administrative Code. The Green Building Code contains both mandatory and voluntary green building measures to conserve energy. The Project would include EV spaces, bike parking and storage, and low-flow water fixtures. The Project would also utilize drought tolerant landscaping and water efficient irrigation.
Ensure that reliable, accessible, affordable, and appealing travel options are readily available, while striving to enhance equity in the offerings in high-need communities.	**No Conflict**. Although this goal applies at a regional level, the Project would support this goal. The Project proposes a self-storage facility on an infill site located in an existing urbanized area within an established network of roads and freeways that provides local and regional access to the Project Site. The Project Site would be located in an existing urban area with an established and extensive transit system. Specifically, the Project Site is located 310 feet to the northeast of the LA Metro Bus Route 18 and 962 feet to the north of LA Metro Bus Route 20. The Project Site is additionally located within a mile of LA Metro Bus Route 204, LADOT Wilshire Center/Koreatown Clockwise and Counterclockwise Bus Route, Wilshire and Vermont Metro Station, and Wilshire and Normandie Station. Thus, the Project Site would be located in proximity to numerous transit options, and the Project would also include bicycle parking to encourage bicycle use.
Support planning for people of all ages, abilities, and backgrounds.	**No Conflict.** The Project would be developed on a currently developed Project Site located within an urbanized area with an established transportation network of roads, freeways, and transit that provides local and regional access to the area, including the Project Site. The Project would provide new self-storage uses that would support the needs of nearby residential and commercial uses. Therefore, the Project would not conflict with this goal.
Communities: Develop, connect, and sustain communities that are livable and thriving.	
Create human-centered communities in urban, suburban, and rural settings to increase mobility options and reduce travel distances.	**No Conflict.** Although this goal applies at a regional level, the Project would be developed on a currently developed Project Site located in an existing urbanized environment. As described above, the Project would be located in proximity to several transit options and would provide bicycle parking, which would increase mobility options and reduce travel distances to the Project Site. The Project will also add a valuable community amenity to the neighborhood such that residents will not have to travel as far for their storage needs. Therefore, the Project would not conflict with this goal.

SCAG Goals	Project Consistency Analysis
Produce and preserve diverse housing types in an effort to improve affordability, accessibility, and opportunities for all households.	**No Conflict.** The Project does not include new housing, nor would it remove existing housing. However, the Project will add a self-storage use near numerous residential uses, many of which have small units that are lacking in adequate storage space. Thus, the Project will indirectly support the preservation of this existing housing by providing convenient nearby storage. Similarly, the Project may indirectly encourage the production of additional housing that could be drawn to the compatible use and the general revitalization of the neighborhood that comes with new development.
Environment: Create a healthy region for the people of today and tomorrow.	
Develop communities that are resilient and can mitigate, adapt to, and respond to chronic and acute stresses and disruptions, such as climate change.	**No Conflict.** Although this goal applies at a regional level, the Project would incorporate various sustainability features to improve air quality, reduce greenhouse gas emissions, and enable more sustainable use of energy and water in accordance with current code requirements and City policies. The Project would be designed to meet CALGreen and Title 24 Building Standards Code, as applicable. The Project would include various sustainability features such as EV spaces, bike parking and storage, and low-flow water fixtures. The Project would also utilize drought tolerant landscaping and water efficient irrigation.
Integrate the region's development pattern and transportation network to improve air quality, reduce greenhouse gas emissions and enable more sustainable use of energy and water.	**No Conflict.** While the Project is not a transportation improvement project, the location of the Project within a highly developed area and in close proximity to numerous public transit options would reduce trip lengths and VMT, which would reduce GHG and air quality emissions. Therefore, the Project would not conflict with this goal. The reduction of energy use, improvement of air quality, and promotion of more environmentally sustainable development are encouraged through development of alternative transportation methods, green design techniques for buildings, and other energy-reducing techniques, such as compliance with the applicable provisions of the California Building Energy Efficiency Standards.
Conserve the region's resources.	**No Conflict.** Although this goal applies at the regional level, the Project would not conflict with its implementation. The Project is an infill development, surrounded by urban land uses. It is not located on land designated for agricultural uses, natural resources, or conservation, nor are there any such resources in the vicinity that could be impacted by the Project. Additionally, as mentioned above, the Project would incorporate a variety of sustainability features to help preserve the region's energy and water resources.
Economy: Support a sustainable, efficient, and productive regional economic environment that provides opportunities for all people in the region.	
Improve access to jobs and educational resources.	**No Conflict**. The Project would provide new employment opportunities near residential and institutional uses, employment centers, and public transit services. Therefore, the Project would not conflict with this goal.
Advance a resilient and efficient goods movement system that supports the economic vitality of the region, attainment of clean air and quality of life for our communities.	**Not Applicable**. The Project proposes a self-storage facility that would not include logistics or goods movement. Therefore, this measure is not applicable to the Project.
Source: Southern California Association of Governments, Connect SoCal (2024 – 2050 Regional Transportation Plan/Sustainable Communities Strategy), 2024.	

Green New Deal

The Green New Deal establishes both short-term and long-term goals through the year 2050 concerning water, solar power, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality.[89] Although reducing GHG emissions is not the main purpose of the Green New Deal, addressing climate change is one of eight explicit topics that help define strategies and goals. The Green New Deal's specific targets include ensuring 57 percent of new housing units are built within 1,500 feet of transit by 2025 and 75 percent by 2035; reducing VMT per capita by at least 13 percent by 2025, 39 percent by 2035, and 45 percent by 2050; increasing the percentage of all trips made by walking, biking, micro-mobility/matched rides or transit to at least 25 percent by 2025 and 50 percent by 2035 and has established targets such as 100 percent renewable energy by 2045, installation of 10,000 publicly-available EV supply equipment by 2022 and 28,000 by 2028, diversion of 100 percent of waste by 2050, and recycling 100 percent of wastewater by 2035.[90] Although the Green New Deal mainly targets GHG emissions related to City-owned buildings and operations, **Table 14:** *Green New Deal Consistency* provides a discussion of the Project's consistency with applicable GHG-reducing actions.

Table 14: Green New Deal Consistency

Action	Description	Consistency Analysis
Focus Area: 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.	The City would build upon the success of the Save the Drop program and develop additionalwater conservation campaigns. In addition, the City would continue to benchmark customer use and improve data gathering to identify effective programs.	**No Conflict.** While this action primarily applies to the City and LADWP, the Project would incorporate water conservation features to reduce water use, including low-flow faucets and drought-tolerant landscaping. Water usage rates were calculated assuming default CalEEMod rates. City Ordinance No. 184,248, the 2019 California Plumbing Code, 2022 CALGreen Code, 2020 LA Plumbing Code, and 2022 LAGBC require approximately a 20-percent reduction in water usage as compared to the CalEEMod default base demand. Therefore, Project water usage would be approximately 20 percent lower than assumed in this analysis.
Focus Area: 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.	The City would perform a complete building electrification study and develop supporting programs. Financing would be expanded and improved to provide electrification, existing energy efficiency, and solar programs.	**No Conflict.** While this action primarily applies to the City, the Project would be designed and operated to meet the applicable requirements of the CALGreen Code and the LAGBC. The Project would be subject to the applicable 2025 Title 24 Standards which represent "challenging but achievable design and construction practices" that represent "a major step towards meeting the Zero Net Energy goal.[1]

[89] City of Los Angeles, L.A.'s Green New Deal, Sustainable City pLAn 2019, 2019, https://ladot.lacity.gov/sites/default/files/documents/green-new-deal_plan.pdf. Accessed December 1, 2025.

[90] City of Los Angeles, L.A.'s Green New Deal, Sustainable City pLAn, 2019 Targets.

Action	Description	Consistency Analysis
Reduce building energy use per square feet for all building types 22% by 2025; 34% by 2025; and 44% by 2050	The City would increase awareness of incentives and smart building energy management systems. An energy consumption report will be prepared to assess the energy-water nexus.	**No Conflict.** While this action primarily applies to the City, the Project would be designed and operated to meet or exceed the applicable requirements of the CALGreen Code and the LAGBC.
Focus Area: Mobility and Public Transit		
Reduce VMT per capita by at least 13% by 2025; 39% by 2035; and 45% by 2050	The City would update the TDM ordinance and develop first/last mile infrastructure improvements around transit stations. TDM strategies would also be implemented consistent with the West Wide Mobility Plan to ease congestion.	**No Conflict.** While this action primarily applies to the City, the Project Site is located in an urban and walkable setting surrounded by residential, commercial, and institutional uses with access to extensive public transit and bicycle infrastructure. The Project Site is located 310 feet to the northeast of the LA Metro Bus Route 18 and 962 feet to the north of LA Metro Bus Route 20. Furthermore, the Project Site is located within a mile of LA Metro Bus Route 204, LADOT Wilshire Center/Koreatown Clockwise and Counterclockwise Bus Route, Wilshire and Vermont Metro Station, and Wilshire and Normandie Station. As such, the Project Site location would reduce VMT for some visitors.
Focus Area: Mobility and Public Transit		
Increase the percentage of electric and zero-emission vehicles in the city to 25% by 2025; 80% by 2035; and 100% by 2050.	The City would increase electric vehicle ownership by providing rebates for used EVs and chargers, as well as by promoting trade-in events for electric vehicles. The City would also increase the number of EV charging stations by pursuing public-private partnerships in developing charging stations, streamlining permitting processes for EV charger installations, and updating building codes to simplify EV charging requirements.	**No Conflict.** The Project would support this policy since the Project would comply with City regulations and provide EV charging stations.

1. California Energy Commission, 2019 Building Energy Efficiency Standards for Residential and Nonresidential Buildings, page iv, https://www.energy.ca.gov/sites/default/files/2021-06/CEC-400-2018-020-CMF_0.pdf. Accessed December 1, 2025.

Although the City's Green New Deal is not an adopted plan or directly applicable to private development projects, the Project would not conflict with its goals as it is a commercial use on an infill site in a highly urbanized area in close proximity to transit. Furthermore, the Project would comply with, as applicable, the CALGreen Code, the City of Los Angeles Solid Waste Management Policy Plan, the RENEW LA Plan, and the Exclusive Franchise System Ordinance (Ordinance No. 182,986) in furtherance of the aspirations included in the Green New Deal with regard to energy-efficient buildings and waste and landfills. The Project would also provide bicycle parking and electrical vehicle charging stations. As the Project's GHG emissions would be generated in connection with a development located and designed to be consistent with the applicable City plan goals and actions for reducing GHG emissions, the Project would be consistent with the New Green Deal and impacts would be less than significant. No mitigation is required.

Los Angeles Green Building Code

The LAGBC requires non-residential uses to include short- and long-term bicycle parking, parking areas for low-emitting/fuel efficient and EVs, and energy efficient appliances. The Project would comply with all applicable LAGBC and CALGreen Code requirements as codified by the City, including by providing EV and bicycle parking. Therefore, the Project would minimize operational GHG emissions and would not exceed the SCAQMD's interim significance threshold of 3,000 $MTCO_2e$ per year. As such, the Project would be consistent with the LAGBC and impacts would be less than significant. No mitigation is required.

Conclusion

The consistency analysis above demonstrates that the Project complies with the applicable GHG reduction actions/strategies at the state, regional, and local levels. Thus, pursuant to State CEQA Guidelines Section 15064.4(b)(3)[91], the Project's impacts on GHG emissions are less than significant, and no mitigation measures would be required.

Cumulative Impacts

Climate change is a global problem. GHGs are global pollutants, unlike criteria air pollutants and TACs, which are pollutants of regional and local concern. Pollutants with localized air quality effects have relatively short atmospheric lifetimes (about one day), whereas GHGs have much longer atmospheric lifetimes of one year to several thousand years, which allow GHGs to be dispersed fairly evenly in Earth's atmosphere around the globe.

The State CEQA Guidelines clarify that the effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis (see State CEQA Guidelines Section 15064.4). As a note, the CEQA Guidelines were amended in response to SB 97. In particular, the CEQA Guidelines were amended to specify that compliance with a GHG emissions reduction plan renders a cumulative impact insignificant.[92] Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that would avoid or substantially lessen the cumulative problem within the geographic area of the project.[93]

As a general matter, an individual project of this size and nature is of insufficient magnitude by itself to influence climate change or result in a cumulatively consideration contribution to the global phenomenon of climate change.[94] As the California Supreme Court explained, "because of the global scale of climate change, any one project's contribution is unlikely to be significant by itself".[95] As such, GHG impacts are recognized as exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective. In other words, the analysis herein is inherently a cumulative impact analysis. The additive effect of Project-related GHGs would not result in a reasonably foreseeable cumulatively considerable contribution to global climate change. As discussed above, the Project is consistent with and

91 CEQA Guidelines Section 15064.4(b)(3).

92 California Governor's Office of Planning and Research, Proposed Updates to the CEQA Guidelines – Final, page 84, 2017, https://lci.ca.gov/ceqa/docs/20171127_Comprehensive_CEQA_Guidelines_Package_Nov_2017.pdf. Accessed December 1, 2025.

93 14 California Code of Regulations, § 15064(h)(3).

94 California Air Pollution Control Officers Association, CEQA and Climate Change White Paper, page 27, 2008, https://www.ncuaqmd.org/files/1997c676d/CAPCOA-White-Paper_CEQA_Climate_Change.pdf. Accessed December 1, 2025.

95 *Cleveland National Forest Foundation v. San Diego Assn. of Governments* (2017) 3 Cal.5th 497, 512.

would not interfere with the implementation of the applicable State, regional, and local regulations, plans, and policies. In addition, the Project, as well as the other cumulative Related Projects, would be subject to all applicable regulatory requirements mentioned above that would reduce GHG emissions. As such, the Project would not result in a significant cumulative GHG impact.

4.9 HAZARDS AND HAZARDOUS MATERIALS

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

The following discussion is based on the *Phase I Environmental Site Assessment Report* (2025 Phase I ESA), prepared by Citadel EHS and dated June 12, 2025, that was conducted to evaluate the presence of known or suspected hazardous materials or waste at the Project Site. In addition, the discussion is based on the *Phase II Subsurface Investigation Report* (2025 Phase II Report), prepared by Citadel EHS and dated July 29, 2025. The 2025 Phase I ESA and the 2025 Phase II Report are included in **Appendix G**.

The 2025 Phase I ESA included a review of environmental regulatory databases, aerial photographs, and topographic and fire insurance maps, as well as a reconnaissance survey of existing conditions of the Project Site. The 2025 Phase I ESA was prepared in order to identify existing or potential recognized

environmental conditions (REC) affecting the Project Site that could indicate the potential for release of hazardous material into the environment. A REC is the presence or likely presence or any hazardous substances or petroleum products in, on, or at the property due to release to the environment; under conditions indicative of a release to the environment; or under conditions that pose a material threat of a future release to the environment. The 2025 Phase I ESA also categorizes RECs as controlled RECs (CREC) and/or historical RECs (HREC). A CREC is a REC resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority, and an HREC is a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls.

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

Less Than Significant Impact.

Construction

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

Operation

Operation of the Project's storage and office leasing uses would involve the use and storage of small quantities of potentially hazardous materials in the form of common hazardous substances typical of those used in commercial developments, including lubricants, paints, solvents, custodial products (e.g., cleaning supplies), pesticides, and other landscaping supplies. The use of these materials would be in small quantities and in accordance with the manufacturers' instructions for use, storage, and disposal of such products. Moreover, as with Project construction, all hazardous materials used on the Project Site during operation would be used, stored, and disposed of in accordance with manufacturer's standards and all applicable federal, state, and local requirements, such as California Hazardous Waste Control Law, Federal and California Occupational Safety and Health Acts, the emergency Planning and Community Right-to-

Know Act (Superfund Amendments and Reauthorization Act, Title III), Safe Drinking Water and Toxic Enforcement Act, and Uniform Fire Code. Therefore, with compliance with manufacturer's standards and all applicable local, State, and federal laws and regulations relating to environmental protection and the management of hazardous materials, operation of the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant, and no mitigation measures would be required.

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

Less than Significant Impact with Mitigation Incorporated. As noted in the 2025 Phase I ESA, based on historical records, by 1923, the Project Site was developed with five single-family residential structures and associated private garages. The Project Site remained relatively unchanged until 1964, when four of the residential structures were demolished and replaced with a surface parking lot. By 1977, the remaining residence was demolished and the current commercial structure was developed. It should be noted that building records indicate that the current building was constructed in 1965. The Project Site has remained consistent through to the present.

The 2025 Phase I ESA included a review of an April 2018 Environmental Site Assessment (2018 ESA) that identified the Project Site as being within a Methane Hazard Zone, as well as the presence of an abandoned oil well. The 2018 ESA recommended a soil gas screening survey to evaluate the presence of methane in the shallow subsurface, as well as locating the oil well and abandoning it to current standards. Additionally, an auto repair facility at 534 South Westmoreland Avenue was identified on a southwest adjoining property, and sampling was recommended along the southern Project Site boundary. A subsequent Phase II Testing Report (2018 Phase II) was performed in September 2018, which involved the advancement of five exterior borings to 15 feet bgs and one interior boring to 5 feet bgs. The borings were placed primarily along the southern boundary of the Project Site near the auto repair facility, and the interior boring was placed in the approximate location of the abandoned oil well. The oil well could not be definitively located as reinforced concrete and electrical equipment produced high levels of interference during the geophysical survey. Therefore, due to unknown handling and disposal of soil during the construction of the oil well, the potential dumping of drilling muds is considered a REC.

As discussed in the 2018 Phase II, ten soil samples were collected from the borings and analyzed for VOCs and Total Petroleum Hydrocarbons (TPH). No contaminants of concern were reported above their respective reporting limits in the soil samples. Eleven soil gas probes were installed across the borings and were analyzed for VOCs. The analysis found that the concentrations of TCE, when evaluated against an attenuation factor for a future commercial property (mixed-use building with ground-floor commercial tenants which was anticipated in 2018) would be below the regulatory screening level for ambient air. Therefore, the 2018 Phase II concluded that there was no evidence of a significant release of TPH or VOCs, and the low concentrations of trichloroethylene (TCE) in soil gas were considered to be de minimis and did not require a remedial response or agency notification. Nevertheless, based on the current regulatory standards, the TCE concentrations that were considered de minimis in 2018 would now exceed the current screening thresholds; therefore, the TCE concentrations is considered a REC.

The 2025 Phase I ESA for the Project Site identified that the Project Site was listed on the E MANIFEST for the generation of 0.12 pounds of regulated medical waste in 2021. The presence of the Project Site on the database indicates proper disposal. Based on the lack of reported spills or leaks, type of waste, and proper disposal, this listing is not expected to represent a significant environmental concern. The 2025 Phase I ESA also noted that no historical release of petroleum products from a leaking underground storage tank (LUST) has occurred within 0.25-mile and upgradient of the Project Site.

The southwest and southeast adjoining properties were identified on the Historical Gas Station database. The 2018 Phase II on the auto repair and service station and auto repair shop at 534 South Westmoreland Avenue did not identify any contaminants of concern in the soil or soil gas samples. The gasoline service station between 1969 to 1979 located at 3003 West 6th Street did not identify contaminants of concern in the soil or soil gas samples, but based on the redevelopment of the property, downgradient location, distance from the service station to the Project Site, and lack of reported contaminants, that listing would also not likely to have adversely affected the Project Site.

The southwest adjoining property at 3033 West 6th Street was occupied as a drycleaning facility from 2001 to 2008. The property had been developed with a multi-tenant commercial retail structure by 1928, where the drycleaning facility likely occupied one of the tenant spaces. The previous subsurface investigation from 2018 reported elevated concentrations of TCE in soil gas samples. The samples collected along the southern Project Site boundary did not report elevated concentrations of tetrachloroethylene (PCE) or TCE. However, the soil vapor samples collected along the western Project Site boundary reported elevated concentrations of TCE. It could not be determined if the former dry cleaner was the likely source of contamination on-site; however, as no other potential sources were identified within the vicinity of the Project Site, this listing is likely to have adversely affected the Project Site.

The 2025 Phase II Report was conducted to evaluate the current soil vapor conditions of the previously identified TCE contamination in soil vapor. Five borings were advanced to a depth of approximately 15.5 feet bgs, and VOCs were not detected in any of the soil samples. Additionally, three sub-slab soil vapor probes were installed inside the building. A total of 27 VOCs were reported in soil vapor samples and 14 VOCs were reported in the sub-slab soil vapor samples. Benzene and ethylbenzene were reported above the commercial/industrial screening levels. The highest detections of benzene were reported in the 5-foot samples north of the former service station. The highest detections of ethylbenzene were reported in the 5-foot soil vapor samples north of the former service station and current automotive repair. PCE was reported in all 10 soil vapor samples and all 3 sub-slab soil vapor samples, but were all detected at concentrations below the commercial/industrial use screening levels. The presence of VOCs in the soil vapor samples may indicate the potential presence of a near surface source, such as impacts from the adjacent property's former use as a gasoline service station and dry cleaning facility; however, another off-site source for VOCs should not be ruled out.

The Project could also release hazardous materials into the environment during operation if spills or emissions of hazardous materials required for normal operation of commercial land uses (e.g., cleaning solvents, paints, pesticides for landscaping, waxes, dyes, toners, bleach, grease, and petroleum products) occur.

Construction

The Project could release hazardous materials into the environment during construction if spills of hazardous materials required for normal construction activities (e.g., vehicle fuels, paints, oils, and transmission fluids) occur, if asbestos-containing materials (ACMs), lead-based paint (LBP), and polychlorinated biphenyls (PCBs) that may be encountered in the existing buildings are not properly handled and disposed of, or if contaminated soils and/or groundwater are encountered during excavation and proper erosion controls and disposal methods are not implemented.

Spills

During construction, standard construction Best Management Practices (BMPs) for the use and handling of hazardous materials required for construction would be implemented to avoid or reduce the potential for spills and releases pursuant to local, state, and federal regulations, such as the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, and CCR Title 22. In addition, as discussed below, **MM HAZ-1** would require the preparation of a Soil Management Plan (SMP) to address potential soils with residual impacts remaining on the Project Site during future construction/redevelopment activities. The SMP includes best management practices (BMP)s that will be incorporated into the SMP that address hazardous materials spill prevention. These include methods to prevent or reduce the discharge of pollutants to the soil from leaks and spills, reducing the chance for spills, stopping the source of spills, containing and cleaning up spills, properly disposing of spill materials, and education and training of employees and subcontractors on potential dangers to human health and spill prevention and cleanup.

Adherence to **MM HAZ-1** and the regulations listed above would ensure that significant hazards related to the release of hazardous materials into the environment during construction would not occur.

ACMs/LBPs

As the existing building was constructed prior to bans on using ACMs, LBP, and PCBs, there is potential for the presence of ACMs, LBP, and PCBs at the Project Site. Prior to demolition of building components, surveys should be performed to identify if ACMs, LBP, or PCBs are present and to ensure proper handling and disposal and to allow for measures to protect construction worker safety during demolition activities.

In accordance with SCAQMD Rule 1403, the Project Applicant would be required to conduct a comprehensive asbestos survey prior to demolition, subject to approval by LADBS. In the event that ACMs are found, all demolition, transport, and disposal of known and suspected asbestos would be required to adhere to the regulations established in CCR Title 8, Section 341.6; CFR Title 29, Section 1926.1101(b); CFR Title 40, Part 61, Subpart M; and SCAQMD Rule 1403. Demolition, transport, and disposal of known and suspected LBP would be required to adhere to the regulations established in the CFR Title 24, Section 35.86; CFR Title 40, Section 745.103; CFR Title 29, Section 1926.62; and CCR Title 8, Section 1532.1. In addition, development of the Project would include the use of commercially sold construction materials without asbestos or ACMs. Adherence to these regulations and procedures would ensure that all ACMs and LBP would be remediated and disposed of in accordance with federal, state, and local regulations. Through compliance with regulations, including California Health and Safety Code Section 19827.5 and California Occupational Safety and Health Administration's (Cal/OSHA) Lead in Construction Standards,

construction and operation of the Project would not result in reasonably foreseeable upset or accident conditions involving the release of ACMs, LBP, and PCBs into the environment.

Contaminated Soils/Groundwater

As previously discussed, the TCE in soil gas that was previously considered de minimis in 2018 would now exceed the current screening thresholds. Additionally, there is potential that the former dry cleaner on the 3033 West 6th Street property could be a likely source of contamination on-site. Therefore, impacts related to contaminated soils would be potentially significant.

However, the Project would implement **MM HAZ-1**, which would require a SMP to address potential soils with residual impacts remaining on the Project Site during future construction/redevelopment activities. **MM HAZ-2,** which is set forth below, requires that after demolition and before any grading, a geophysical survey would be required to verify the presence and location of the abandoned oil well. If it is determined that the well has not already been abandoned to current safety standards, it must be re-plugged in compliance with California Geologic Energy Management Division (CalGEM) regulations.

With implementation of **MM HAZ-1** and **MM HAZ-2,** impacts would be reduced to less than significant.

Operation

As previously discussed, the use of minor amounts of hazardous materials during operation of the Project would be limited to those similar to any other self-storage urban development. Such hazardous materials typical of commercial storage developments are not considered environmental concerns and their use by the Project would not differ dramatically in type and quantity from existing operations. Moreover, the use of such materials would be subject to compliance with existing regulations, standards, and guidelines established by the federal, State, and local agencies related to storage, use, and disposal of hazardous materials.

The Project Site is located within a Methane Zone. The Methane Zone covers extensive areas of Southern California and is typically related to subsurface methane gas produced from naturally occurring petroleum fields. As the Project Site is within the City's Methane Zone, the Project would be subject to developmental regulations pertaining to ventilation and methane gas detection systems that are mandated by the City. Development would occur per the provisions of the City of Los Angeles Building Code, Division 71, Methane Seepage Regulations. This Division provides information describing the installation procedures, design parameters, and test protocols for methane gas mitigation systems. More specifically, the Methane Mitigation Standards ordinance defines requirements for site testing, methane mitigation systems, and ventilation systems. Compliance with LAMC Division 71 would ensure that construction and operation of the Project would not result in reasonably foreseeable upset or accident conditions involving the release of methane gas into the environment.

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

Conclusion

Based on the above, with implementation of **MM HAZ-1** and **MM HAZ-2,** construction impacts related to encountering contaminated soil would be reduced to less than significant levels. Operational impacts would be less than significant, and no mitigation measures would be required.

Mitigation Measures: As analyzed above, the Project has the potential to result in significant impacts related to encountering contaminated soil during construction activities. However, implementation of the following mitigation measure will reduce the impacts to a less than significant level:

MM HAZ-1: **Soil Management Plan.** Before the Los Angeles Department of Building and Safety issues grading permits, a site-specific Soil Management Plan ("SMP") must be prepared by a qualified environmental professional approved by the City and submitted to the Los Angeles Department of Building and Safety. The SMP must include the following elements, as applicable:

- Provisions for personal protection and monitoring exposure to construction workers,
- Requirements for construction workers to be Hazardous Waste Operations and Emergency Response ("HAZWOPER") trained,
- Procedures to be undertaken in the event that contamination is identified above action levels or previously unknown contamination is discovered,
- Procedures for the safe storage, stockpiling, and disposal of any impacted soils,
- Emergency procedures and responsible personnel,
- Incorporate Best Management Practices (BMPs) into the SMP.

MM HAZ-2: **Geophysical Survey.** After demolition and before any grading, the Applicant will conduct a geophysical survey using cesium magnetics to verify the presence and location of the abandoned oil well**.** A well diagram for the existing abandoned oil well will be completed and submitted to California Geologic Energy Management Division (CalGEM) to establish that no further work is required with respect to the well**.** If it is determined that the well has not already been abandoned to current safety standards, it must be re-plugged and abandoned (P&A) in compliance with CalGEM regulations.

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

Less than Significant Impact. There are four schools located within 0.25-mile of the Project Site: New Horizon School (434 Vermont Avenue) located 0.23 miles to the northwest, Pilgrim School (540 S. Commonwealth Avenue) located 0.13 miles to the east, Young Oak Kim Academy (615 Shatto Place) located 0.15 miles to the southwest, and New Covenant Academy (3119 W. 6th Street) located 0.11 miles to the west.

As discussed under Thresholds a) and b) above, construction of the Project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils typically used in construction. However, all such substances

and materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions and are not expected to cause risk to the public or nearby schools. In addition, all construction work would be performed consistent with applicable federal OSHA Safety and Health Standards and Cal/OSHA requirements to ensure the safety and well-being of construction workers. Similarly, Project operation would entail the minor use of common hazardous substances (e.g., cleaning solvents, paints, pesticides for landscaping, etc.), but the use of such materials would be subject to compliance with existing regulations, standards, and guidelines established by federal, State, and local agencies related to storage, use, and disposal of hazardous materials.

Thus, with compliance with applicable laws, regulations, and manufacturers' instructions, the potential risks of exposure to hazardous materials for the public or the environment, including schools, due to Project construction and operation would be less than significant. Therefore, impacts associated with the Project's use and storage of minor amounts of hazardous materials within 0.25-mile of schools would be less than significant, and no mitigation measures would be required.

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

Less than Significant Impact. California Government Code Section 65962.5 requires various state agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells, and solid waste facilities where there is known migration of hazardous waste and to submit such information to the Secretary for Environmental Protection on at least an annual basis. The Phase I ESA included a search of such environmental records published by local, State, tribal, and federal agencies pursuant to Government Code Section 65962.5. The Project Site is not listed on the environmental databases. Therefore, impacts would be less than significant, and no mitigation measures would be required.

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

No Impact. The Project Site is located approximately 2.5 miles northwest of the Los Angeles Times-Los Angeles Heliport, 9.5 miles northeast of Santa Monica Airport, 9.7 miles southeast of Hollywood-Burbank Airport, and 9.9 miles northeast of Los Angeles International Airport (LAX). The Project Site is not located within the Planning Boundary/Influence Area or within an existing or projected noise contour associated with any private or public airport or airstrip. The Project would not expose people residing or working at the Project Site to excessive noise levels. Therefore, no impacts would occur, and no mitigation is required.

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

Less than Significant Impact. A project would normally have a significant impact to hazards and hazardous materials if the project involved possible interference with an emergency response plan or emergency evacuation plan. The Project would not create such an impact. The Project Site is located in an established urban area that is well served by an existing roadway network. The Project Site is located along Westmoreland Avenue and South Virgil Avenue, which are not designated as Primary or Secondary

Disaster Routes.[96] Disaster routes further from the Project Site include Beverly Boulevard and North Alvarado Street.[97] These Primary Disaster Routes would not be subject to any lane closures as a result of the Project. Construction of the Project Site may require temporary and intermittent partial street closures, but any such closures would be subject to City approval and would not be expected to substantially interfere with any emergency response or evacuation plans.

Further, as discussed in Section 4.17*, Transportation*, as part of the Project, a detailed Construction Management Plan, included as **PDF-TRANS-1**, would be implemented to minimize construction impacts for vehicles, bicyclists, and pedestrians. The Construction Management Plan would include a worksite traffic control plan, in accordance with applicable City guidelines, for any temporary closure of curb lanes or sidewalks, and these plans would provide for safe and efficient movement for vehicular and pedestrian traffic. The Construction Management Plan would be prepared and submitted to the City for review and approval and would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community and avoid congestion. Implementation of the Construction Management Plan would ensure that vehicle and emergency vehicle access would be maintained throughout the course of construction activities.

With regards to operation, the Project would not include or cause permanent alterations to vehicular circulation routes and patterns, impede public access, or travel upon public rights-of-way. Emergency vehicle access to the Project Site would be provided from Westmoreland Avenue or Virgil Avenue. The Project would not include the installation of barriers (e.g., perimeter fencing, fixed bollards, etc.) that could impede emergency access within the vicinity of the Project Site. Moreover, all loading/unloading activities would take place within the Project's covered parking garage. Future driveway and building configurations would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for patrons, employees, and residents. Project Site access and circulation plans would be subject to review and approval by LAFD and LAPD.

No policy or procedural changes to an existing emergency response plan or evacuation plan would be required due to operation of the Project. Furthermore, during an unanticipated disaster event, City and County agencies (i.e., Police and Fire Departments) would implement operational protocols, as well as plans and programs, on a case-by-case basis to facilitate emergency evacuations and/or response, which would consider traffic conditions at the time of the emergency. In such instances, traffic would be routed along the City's disaster routes, as determined appropriate, by the applicable responding City agencies. Compliance with existing regulations would ensure that implementation of the Project would not impair or physically interfere with an adopted emergency response plan or with an emergency evacuation plan.

Therefore, impacts related to emergency response plans and emergency evacuation plans are less than significant, and no mitigation measures are required.

[96] Los Angeles County Department of Public Works, Disaster Route Maps, City of Los Angeles Central Area, https://dpw.lacounty.gov/dsg/disasterroutes/map/Los%20Angeles%20Central%20Area.pdf. Accessed December 3, 2025.

[97] Los Angeles County Department of Public Works, Disaster Route Maps, City of Los Angeles Central Area.

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

No Impact. The Project Site is located in a Local Responsibility Area (LRA) and is identified as a No Fire Hazard Severity Zone in a Local Responsibility Area, per Government Code Section 51178. The Project Site is not located in an area of moderate or very high fire hazard.[98] In addition, the Project Site is located in a highly urbanized area of the City and does not include wildlands or high fire hazard terrain or vegetation. Furthermore, the Project would be developed in accordance with LAMC and LAFD requirements pertaining to fire safety. Therefore, the Project would not expose people or structures, directly or indirectly, to a significant risk of loss, injury, or death as a result of exposure to wildland fires. As such, no impact would occur, and no mitigation measures would be required.

Cumulative Impacts

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

Some of the Related Projects include the use of hazardous materials within 0.25-mile of a school. However, Related Projects would be subject to environmental review to evaluate potential impacts from hazardous materials releases within 0.25-mile of a school, thereby reducing impacts to less than significant. None of the Related Projects are within two miles of an airport land use plan, and thus there would be no impacts.

Some of the Related Projects may involve temporary construction encroachments into adjacent sidewalks or roadways. However, any changes to access and building configurations would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for patrons, employees, and potential residents. All access and circulation plans would be subject to review and approval by the LAFD and would be developed to meet City standards for emergency access. The Related Projects would be developed within the existing urban grid and would not require alterations to emergency access routes and would not contribute to cumulative effects in concert with the Project.

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

[98] State of California Office of the State Fire Marshall. Find your Fire Hazard Severity Zone, https://experience.arcgis.com/experience/5065c998b4b0462f9ec3c6c226c610a9. Accessed November 11, 2025.

Overall, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative impacts related to hazards and hazardous materials and would be less than significant.

4.10 HYDROLOGY AND WATER QUALITY

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

The following impact analysis pertaining to hydrology and water quality incorporates information on the existing and proposed topography/drainage and infrastructure for the Project Site provided in the *LID/Hydrology/Hydraulics Report for 525 Virgil Avenue, Los Angeles, California 90020*, prepared by Ware Malcomb, January 2026 (Hydrology Report). The Hydrology Report is included in **Appendix H**.

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

Less Than Significant Impact. The Project Site is currently approximately 98 percent impervious and is currently developed with a commercial building and surface parking. There are no signs of concentrated flow paths or erosion on the Project Site. There are not currently any known LID treatment devices on the Project Site.

Surface Water Quality

Construction

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

However, as the construction site would be less than one acre, the Project would not be required to obtain a National Pollutant Discharge Elimination System (NPDES) Construction General Permit.[99] Even so, however, the Project would be required to implement BMPs, as required in the Project's Stormwater Pollution Prevention Plan (SWPPP), following the latest guidelines of the California Stormwater Quality Association (CASQA) handbook as part of the City's grading permit requirements.

BMPs would include, but would not necessarily be limited to, erosion control, sediment control, non-stormwater management, and materials management BMPs (e.g., sandbags, storm drain inlets protection, stabilized construction entrance/exit, wind erosion control, and stockpile management) to minimize the discharge of pollutants in stormwater runoff during construction. In addition, Project construction activities would occur in accordance with City grading permit regulations (LAMC Chapter IX, Article 1, Division 70), such as the preparation of an Erosion Control Plan, to reduce the effects of sediment and erosion.

In addition, the Project would be required to comply with all applicable City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion. Thus, through implementation of BMPs and compliance with applicable City grading regulations, the Project would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion, siltation, or flooding on- or off-site. Similarly, adherence to standard compliance measurements in construction activities would ensure that construction of the Project would not cause the rate or amount of surface runoff in a manner that would result in flooding on- or off-site. As construction activities would be limited to the Project Site, such activities would not conflict with implementation of a water quality control plan. Therefore, construction-related impacts to surface water hydrology would be less than significant, and no mitigation measures would be required.

Operation

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

[99] https://www.waterboards.ca.gov/water_issues/programs/stormwater/construction.html

captured and used, and/or treated through high efficiency BMPs onsite for the volume of water produced by the 85th percentile storm event.

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

As noted in the Hydrology Report, infiltration is not feasible for the Project Site. Since infiltration is not feasible, biofiltration will be used on the Project Site. Ground floor LID planters will be utilized to treat the required amount of stormwater and drain into an underground detention system.

Operation of the Project would not result in discharges that would cause regulatory standards to be violated. Based on the Hydrology Report, the Project would maintain the amount of runoff in comparison to the existing condition and would remain approximately 98 percent impervious. The Project would include the installation of LID BMPs, which would mitigate at minimum the first flush or the equivalent of the greater between the 85th percentile storm and first 0.75-inch of rainfall for any storm event.

Due to incorporation of the required LID BMPs, operation of the Project would not result in discharges that would cause: (1) pollution which would alter the quality of the waters of the State to a degree which unreasonably affects beneficial uses of the waters; (2) contamination of the quality of the waters of the State by waste to a degree which creates a hazard to the public health through poisoning or through the spread of diseases; or (3) nuisance that would be injurious to health; affect an entire community or neighborhood, or any considerable number of persons; and occurs during or as a result of the treatment or disposal of wastes. Therefore, potential operational impacts to surface water hydrology would be less than significant, and no mitigation measures would be required.

Groundwater Quality

Construction

Construction of the Project would require the export of approximately 5,600 cubic yards of soil (7,280 with a 30-percent swell factor applied). Any contaminated soils found would be captured within that volume of excavated material, removed from the Project Site, and remediated at an approved disposal facility in accordance with regulatory requirements.

During on-site grading and building construction, hazardous materials, such as fuels, paints, solvents, and concrete additives, could be used and would therefore require proper management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the opportunity for hazardous materials releases into groundwater. Compliance with all applicable federal, state, and local requirements concerning the handling, storage, and disposal of hazardous waste would reduce the potential for the construction of the Project to release contaminants into groundwater that could affect existing contaminants, expand the area or increase the level of groundwater contamination, or cause a violation of regulatory water quality standards at an existing production well. Therefore, the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade groundwater quality. As construction activities are not expected to encounter existing

groundwater supplies, it would not conflict with the implementation of a sustainable groundwater management plan. Therefore, impacts on groundwater quality during construction would be less than significant, and no mitigation measures would be required.

Operation

Operational activities that could affect groundwater quality include potential hazardous material spills and the presence of LUSTs. No underground storage tanks are known to be currently operated on the Project Site, nor will any be operated by the Project. In addition, while the development of new building facilities would slightly increase the use of on-site hazardous materials as described above, compliance with all applicable existing regulations at the Project Site regarding the handling and potentially required cleanup of hazardous materials would prevent the Project from affecting or expanding any potential areas of contamination, increasing the level of contamination, or causing regulatory water quality standards at an existing production well to be violated, as defined in the CCR Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act. Furthermore, as described above, operation of the Project would not require extraction from the groundwater supply based on the depth of excavation for the proposed uses and the depth of groundwater below the Project Site. Therefore, Project operations would not violate any water quality standards or waste discharge requirements with respect to groundwater or otherwise substantially degrade ground water quality. Therefore, the Project's potential impact on groundwater quality during operation would be less than significant, and no mitigation measures would be required.

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

Less Than Significant Impact.

Construction

Construction activities for the Project would include excavating for building foundations, building up the structure, and installing hardscape and landscape around the structure. As noted in the Geotechnical Report, the Project Site was explored on May 13, 2025, by excavating two exploratory borings. Groundwater seepage was encountered in exploratory borings at depths ranging from 25 to 29½ feet below grade and the historically highest groundwater level is on the order of 20 feet below site grade. The expected excavation depth for the Project is approximately six to eight feet below grade, and the Project does not include any subterranean elements; therefore, the chance of the Project encountering groundwater during construction is low.

If groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance with all applicable regulations and requirements, including with all relevant requirements related to construction and discharges from dewatering operations. Therefore, the Project would not substantially deplete groundwater supplies in a manner that would result in a net deficit in aquifer volume or lowering of the local groundwater table. Thus, construction-related impacts to groundwater would be less than significant, and no mitigation is required.

Operations

This analysis conservatively assumes that the Project will be approximately 98 percent impervious to demonstrate that there will be no net increase in runoff. Implementation of the Project would require

incorporation of LID BMPs to treat the "first flush" rain event and as such would be required to utilize infiltration methods. The Project's stormwater will be captured in LID trays and drained into a proposed underground detention system, which will not result in infiltration of a large amount of rainfall that would affect groundwater hydrology, including the direction of groundwater flow.

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

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

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

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

Less than Significant Impact.

Construction

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

Operations

Implementation of the Project would require incorporation of LID BMPs to treat the "first flush" rain event and as such would be required to utilize infiltration methods. As discussed above, the Project must comply with the City's LID Ordinance requirements to retain, treat, and/or filter stormwater runoff to mitigate the impacts of any post-development increases in runoff. Therefore, the Project would not substantially alter the existing drainage pattern of the Project Site or the surrounding area such that substantial erosion or siltation on-site or off-site would occur. Operational impacts to erosion and siltation would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact.

Construction

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

Operation

Stormwater currently drains to the south via sheet flow on both Virgil Avenue and Westmoreland Avenue. Virgil Avenue has catch basins that connect to an underground storm drainpipe 12-inches in diameter. All stormwater along Virgil Avenue and Westmoreland Avenue flows in the gutter to a catch basin in Virgil Avenue. The line connects to a 12-inch diameter drainpipe along 6th Street where gravity flows from west to east.

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

The Project's stormwater will be captured in LID green roof trays that will drain into a proposed underground detention system. This analysis conservatively assumes that the Project Site will be 98 percent impervious to demonstrate there is no net increase in runoff. The Project would include the installation of LID BMPs, which would mitigate at minimum the first flush or the equivalent of the greater between the 85th percentile storm and first 0.75-inch of rainfall for any storm event.

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

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

Less Than Significant Impact.

Construction

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

Operation

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

As such, Project operation would not increase the rate or amount of surface runoff in a manner which would result in runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Therefore, operational impacts associated with excessive runoff would be less than significant, and no mitigation measures are required.

iv) Impede or redirect flood flows?

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

[100] FEMA Flood Map Service Center, https://msc.fema.gov/portal/search?AddressQuery=525%20south%20virgil%20avenue%2C%20los%20angeles, Accessed December 3, 2025.

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

Less than Significant Impact. The Project Site is not located within a tsunami or seiche zone.[101] Additionally, although the Project Site is located within the potential inundation boundaries of the Silver Lake Reservoir and Rowena Reservoir,[102] these reservoirs as well as others in California, are continually monitored by various governmental agencies (such as the State of California Division of Safety of Dams and the U.S. Army Corps of Engineers) to guard against the threat of failure. Current design and construction practices and ongoing programs of review, modification, or total reconstruction of existing dams are intended to ensure that all dams are capable of withstanding the maximum considered earthquake for the site as well as other conditions that could undermine the integrity of the dam.

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

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

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

As previously detailed, construction of the Project would prevent the spread of contaminants into groundwater through compliance with all relevant City requirements related to discharges from dewatering operations and would prevent the spread of contaminants into surface water through adherence to applicable regulations and BMPs for the handling and storing of hazardous materials. These regulations and practices were adopted to, and have been shown to, effectively control the potential stormwater pollution to surface water during construction.

Potential pollutants generated by Project operation would be those typical of commercial land uses and may include sediment, nutrients, pesticides, trash and debris, oil and grease, and metals. As discussed above, the implementation of BMPs as required by the City's LID Ordinance would target the pollutants that could potentially be carried in stormwater runoff. The Project's stormwater treatment system, described above, would reduce stormwater pollutants in accordance with the City's LID requirements. As

[101] City of Los Angeles Department of City Planning, Zone Information & Map Access System, http://zimas.lacity.org. Accessed December 18, 2025.

[102] Preliminary Geotechnical Engineering Site Investigation, Proposed Self-Storage Facility 515, 517, 525, and 531 S. Virgil Avenue, 518 and 526 S. Westmoreland Avenue, Los Angeles, CA, Prepared by Geotechnologies Inc, July 17, 2025 Revised November 18, 2025.

such, the Project would not introduce new pollutants or an increase in pollutants that could conflict with or obstruct any water quality control plans.

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

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

Cumulative Impacts

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

The Project Site and the Related Projects are located in a highly urbanized area, and it is anticipated that future development in this highly urbanized area is not likely to cause substantial changes in regional water quality. As noted above, the Project does not have an adverse impact on water quality. It is likewise anticipated that the Related Projects would also be subject to LID requirements. The Project, combined with the Related Projects, would comply with all applicable laws, rules, and regulations, so cumulative impacts to surface water quality would be less than significant.

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

Future growth in the Wilshire Community Plan area would be subject to requirements relating to groundwater quality. In addition, since the Project Site is located in a highly urbanized area, future land use changes or development are not likely to cause substantial changes in regional groundwater quality.

As noted above, the Project does not have an adverse impact on groundwater quality. Also, it is anticipated that, like the Project, other future development projects would comply with all applicable laws, rules, and regulations, and therefore cumulative impacts to groundwater quality would be less than significant.

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

4.11 LAND USE AND PLANNING

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

a) Physically divide an established community?

Less Than Significant Impact. The Project proposes the demolition of the existing approximately 56,072 vacant four-story sf office building and its associated parking lot and would develop an approximately 252,873 sf, eight story storage facility. Development of the Project would remain within the boundaries of the existing Project Site and would result in further infill of an already developed community. Accordingly, it would not divide an established community. Therefore, impacts would be less than significant, and no mitigation measures are required.

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

Less than Significant Impact. Under CEQA, the Project would conflict with an applicable plan if it does not meet the general intent of the plan and/or would obstruct the attainment of the plan's primary goals.[103] As discussed below, the Project would be substantially consistent with, and therefore not in conflict with, all applicable plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect associated with development of the Project Site. These include the SCAG 2024–2050 RTP/SCS, the City of Los Angeles General Plan Framework Element (Framework Element), the Health and Wellness Element, the Wilshire Community Plan, and the LAMC (Chapter 1—General Provisions and Zoning). Therefore, impacts related to land use and planning would be less than significant, and no mitigation measures are required.

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

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

Southern California Association of Governments

SCAG is a Joint Powers Authority[104] under California state law, established as an association of local governments and agencies that convene as a forum to address regional issues. Under federal law, SCAG is designated as a Metropolitan Planning Organization (MPO) and, under state law, as a Regional Transportation Planning Agency and a Council of Governments. SCAG is the MPO for six counties: Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. As the federally designated MPO, SCAG is mandated to research and create plans for transportation, growth management, hazardous waste management, and air quality.

SCAG 2020-2050 RTP/SCS

On September 30, 2008, SB 375 was passed[105] to help achieve AB 32 goals related to the reduction of GHGs through regulation of cars and light trucks. SB 375 aligns three policy areas of importance to local government: (1) regional long-range transportation plans and investments, (2) regional allocation of the obligation for cities and counties to zone for housing, and (3) a process to achieve GHG emissions reductions targets for the transportation sector. It establishes a process for CARB to develop GHG emissions reductions targets for each region (as opposed to individual local governments or households). SB 375 also requires Metropolitan Planning Organizations (MPOs) to prepare an SCS within the RTP that guides growth while taking into account the transportation, housing, environmental, and economic needs of the region.

On April 4, 2024, SCAG's Regional Council adopted the 2024-2050 RTP/SCS. The 2024-2050 RTP/SCS outlines a vision for a more resilient and equitable future, with investment, policies and strategies for achieving the region's shared goals through 2050. The Plan elements that are necessary to bring this vision to fruition are organized within the pillars of Mobility, Communities, Environment, and Economy. On May 7, 2025, CARB accepted SCAG's determination that the 2024-2050 RTP/SCS meets the State's GHG emission reduction targets.

SCAG's RTP/SCS presents strategies and measures that are consistent with local jurisdictions' land use policies and incorporates best practices for achieving the state-mandated reductions in GHG emissions at the regional level through reduced per-capita VMT. It is important to note, however, that SCAG does not have a direct role in implementing the SCS through decisions about the type and location of development.

The 2024-2050 RTP/SCS provides a blueprint for improving quality of life for residents by providing choices for where they will live, work, and play and how they will move around. It is designed to promote safe, secure, and efficient transportation systems to provide improved access to opportunities, such as jobs, education, and healthcare. Its emphasis on transit and active transportation is designed to allow residents to lead a healthier, more active lifestyle. The Plan remains focused on its core responsibilities and on the requirement of a comprehensive regional transportation plan integrated with development of a Sustainable Communities Strategy (SCS) and a holistic approach to programs and strategies that support the success of the Regional Transportation Plan, such as workforce development, broadband, and mobility hubs. The goals of the 2024-2050 RTP/SCS fall under four core categories: Mobility, Communities,

[104] Joint Powers Authorities are legally created entities that allow two or more public agencies to jointly exercise common powers.
[105] California Legislative Information, Senate Bill No. 375, https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=200720080SB375. Accessed November 8, 2025.

Environment, and Economy. The 2024-2050 RTP/SCS embodies a collective vision of the region's future through the year of 2050. The Plan aims to support economic growth, achieve environmental goals, promote public health, quality of life, and social equity, and ensure continued access to federal and State transportation funding.

A consistency analysis with the 2024-2050 RTP/SCS is provided above in Section 4.8 *Greenhouse Gases*. As described in that section, the Project would not conflict with the applicable goals set forth in the 2024-2050 RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect. Specifically, the Project would support the goals of the 2024-2050 RTP/SCS because it would be developed on an infill site in an existing urban area. The Project would support improved air quality and would minimize GHG emissions by locating a new self-storage use next to existing transit, services, and complimentary land uses. Furthermore, the Project would also include bicycle parking to encourage bicycle use. The Project would include pedestrian-friendly landscaping and design, and a new modern building that would enliven the pedestrian experience. The Project would be designed to meet applicable CALGreen and Title 24 Building Standards Code provisions and would include various sustainability features such as EV spaces, bicycle parking and storage, low-flow water fixtures, drought tolerant landscaping, and water efficient irrigation.

City of Los Angeles General Plan

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

General Plan Framework Element

The General Plan Framework Element sets forth a citywide comprehensive long-range growth strategy and defines Citywide policies regarding land use, housing, urban form, neighborhood design, open space and conservation, economic development, transportation, infrastructure, and public services. Framework Element land use policies are implemented at the community level through community plans and specific plans. The Land Use Chapter of the Framework Element provides objectives and policies intended to serve as guidelines for the community plans. The consistency of the Project with applicable objectives and policies in the General Plan Framework Element is presented in **Table 15:** *Consistency with the Framework Element*. As shown, the Project would be consistent with the applicable objectives and policies.

Table 15: Consistency with the Framework Element

Objective/Policy	Would the Project Conflict?
Distribution of Land Uses	
Objective 3.1: Accommodate a diversity of uses that support the needs of the City's	**No Conflict.** The Project will contribute toward and facilitate the City's long-term fiscal and economic viability by providing a new

Objective/Policy	Would the Project Conflict?
existing and future residents, businesses, and visitors.	storage facility, with new employees on a currently vacant site with no active uses, thereby diversifying the uses in the area. The self-storage use would serve the needs of residents and professionals in the Koreatown area by providing storage services in an area populated predominantly by smaller multi-family units that lack adequate storage facilities.
Objective 3.2: Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicular trips, vehicle miles traveled, and air pollution.	**No Conflict.** The Project would construct infill development near numerous public transit options, which would reduce vehicle trips, VMT, and air pollution. In addition, the Project encourages alternative modes of transportation and fewer vehicle trips by providing 50 bicycle spaces (25 short-term bicycle parking and 25 long-term bicycle parking stalls) and EV parking stalls, and by being located in close proximity to numerous public transit options.
Policy 3.2.3: Provide for the development of land use patterns that emphasize pedestrian/ bicycle access and use in appropriate locations.	**No Conflict.** The Project would promote and provide access for all modes of travel, including pedestrians and cyclists. The Project would provide secure on-site bicycle parking to promote cycling. The installation of new landscaping and new artistic murals would promote the walkability of the adjacent streets and the Project Site.
Objective 3.4: Encourage new multi-family residential, retail commercial, and office development in the City's neighborhood districts, community, regional, and downtown centers as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts.	**No Conflict.** The Project would provide storage uses in an urbanized area well-served by transit and within walking distance of offices, commercial developments, and residential uses. The Project would support the needs of the community. The Project will indirectly support these existing residential, commercial, and office uses by providing convenient nearby storage. Similarly, the Project may indirectly encourage the production of additional housing and commercial uses that could be drawn to the compatible use and the general revitalization of the neighborhood that comes with new development.
Policy 3.15.5: Provide for the development of public streetscape improvements, where appropriate.	**No Conflict.** The Project's new artistic murals and new landscaping would promote walkability along adjacent streets and would enhance the built environment. Additionally, the Project will provide a three-foot dedication along Virgil Avenue, which will facilitate future public improvements that may be carried out by the City.
Urban Form and Neighborhood Design Chapter	
Objective 5.2: Encourage future development in centers and in nodes along corridors that are served by transit and are already functioning as centers for the surrounding neighborhoods, the community, or the region.	**No Conflict.** The Project would develop new storage uses on a Project Site well-served by transit options and regional and local streets and highways. The Project would be consistent with the mix of residential and commercial uses near the Project Site. The Project is located in the Koreatown community, consisting predominantly of medium- to high-density multifamily developments with large numbers of tenants. The new self-storage uses would support surrounding commercial and residential uses. In particular, many of the surrounding multi-family uses contain small units that are lacking in adequate storage space.
Objective 5.5: Enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm.	**No Conflict.** The Project would be designed with a modern architectural style that features flat roofs, a storefront with glazing, architectural finishes and louvers, steel beams, and metal panels. The building facades would include variations of white, gray, and green metal panels. At the street level, the building combines

Objective/Policy	Would the Project Conflict?
	decorative metal panels, stonework, and landscaping to create a pedestrian oriented environment. The Project would provide pedestrian access on Virgil Avenue east of the Project Site and on Westmoreland Avenue, west of the Project Site. Moreover, the Project will include large decorative murals that will be designed in coordination with community stakeholders. All of these features will enhance the livability of the neighborhood and upgrade its quality.
Objective 5.9: Encourage proper design and effective use of the built environment to help increase personal safety at all times of the day.	**No Conflict.** Access to the Project Site would be limited to existing and potential customers, delivery personnel, and. The Project would also incorporate guidelines as identified in the "Design Out Crime Guidelines: Crime Prevention Through Environmental Design," published by the Los Angeles Police Department. Such design guidelines provide security design measures for semi-public and private spaces, which may include but not be limited to, the use of security cameras, access control to the building, secured parking facility, well illuminated public and semi-public space designed with minimal dead space to eliminate areas of concealment, and locating building entrances in high-foot traffic areas. The Project would also include lighting of building entries and walkways to provide for pedestrian orientation and to clearly identify and secure routes between parking areas and points of entry into the buildings. The Project will also only be accessible between the hours of approximately 6 a.m. and 10 p.m. and will be secured and inaccessible at all other times.
Urban Form and Neighborhood Design Chapter	
Policy 7.2.6: Concentrate office development in regional mixed-use center, around transit stations, and within community centers.	**No Conflict.** The Project Site is situated in a mixed-use urban environment surrounded by residential, commercial, institutional, park and service uses. The Project Site is within close proximity to several transit options.
Infrastructure and Public Services Chapter	
Objective 9.6: Pursue effective and efficient approaches to reducing stormwater runoff and protecting water quality.	**No Conflict.** During construction, the Project would be required to implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows and prevent pollution. In addition, Project construction activities would occur in accordance with City grading permit regulations (LAMC Chapter IX, Article 1, Division 70), such as the preparation of an Erosion Control Plan, to reduce the effects of sediment and erosion. The Project would implement LID requirements throughout the operational life of the Project to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site in accordance with the City's LID Manual.
Objective 9.10: Ensure the water supply, storage, and delivery systems are adequate to support planned development.	**No Conflict.** The Project would be within LADWP's current and projected available water supplies for normal, single-dry, and multiple-dry years. As such, LADWP would be able to meet the water demand of the Project, as well as existing and planned future water demands of its service area. Further, the Project would not exceed the available capacity within the distribution infrastructure that would serve the Project Site. Therefore, the water supply, storage, and delivery systems would be adequate to support the Project's development.

Objective/Policy	Would the Project Conflict?
Source: Kimley-Horn, 2026. City of Los Angeles, The Citywide General Plan Framework Element, readopted August 2001.	

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

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

Because the Project would not conflict with the Plan for a Healthy Los Angeles policies, as shown in **Table 16:** *Consistency with the Health and Wellness Element*, impacts with respect to consistency with the Plan for a Healthy Los Angeles would be less than significant.

Table 16: Consistency with the Health and Wellness Element

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

Objective/Policy	Would the Project Conflict?
children, seniors, and others susceptible to respiratory diseases.	transportation that could help reduce GHG emissions from private automobile travel.

Source: Kimley-Horn, 2026.
City of Los Angeles Department of City Planning, Health and Wellness Element, adopted 2015, amended 2021.

Wilshire Community Plan

The community plans are intended to promote an arrangement of land uses, streets, and services, which would encourage and contribute to the economic, social, and physical health, safety, and welfare of the people who live and work in the community. The community plans are also intended to guide development in order to create a healthful and pleasing environment. The community plans coordinate development among the various communities of the City and adjacent municipalities in a fashion both beneficial and desirable to the residents of the community. The Project Site is located within the Wilshire Community Plan, which was adopted by the City on September 19, 2001.

Table 17: *Consistency with the Wilshire Community Plan* sets forth the 2001 Wilshire Community Plan's goals and policies applicable to the Project and discusses the Project's consistency with each of them. As shown, the Project would be consistent with the applicable objectives and policies of the Wilshire Community Plan.

Table 17: Consistency with the Wilshire Community Plan

Objective/Policy	Would the Project Conflict?
2001 Wilshire Community Plan	
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.	**No Conflict.** The Project would include a storage facility that would promote economic vitality and serve the needs of surrounding residential and commercial areas. The Project would incorporate numerous safety features, including security cameras, burglar alarms, access control to the building, and bolt-cutter resistant cylinder locks. Additionally, as discussed in Section 4.5 above, the Project will have no significant impacts on any historic or cultural resources.
Objective 2-1: Preserve and strengthen viable commercial development and provide additional opportunities for new commercial development and services within existing commercial areas.	**No Conflict**. The Project would include a storage facility in an infill development within an existing urbanized area that would promote economic vitality and strengthen commercial development in the Wilshire Community. The Project would provide new storage uses that support nearby residential and commercial uses in a dense urban environment. The Project is surrounded by supportive residential and commercial uses and is located near transit. The Project would provide pedestrian access to the Project Site via existing sidewalks on Virgil Avenue and Westmoreland Avenue. Pedestrians would be able to access the Project Site using pedestrian walkways located on the ground floor along Virgil Avenue and Westmoreland Avenue.
Policy 2-1.1 New Commercial uses should be located in existing established commercial areas or shopping centers.	
Objective 2-2: Promote distinctive commercial districts and pedestrian-oriented areas.	
Objective 2-3: Enhance the visual appearance and appeal of commercial districts.	**No Conflict.** While this is a citywide objective, the Project would support its implementation. Specifically, the Project would be designed to be compatible in size and massing with surrounding land uses. The building facades would include variations of white, gray, and green metal panes. The new building would be designed with a modern architectural style. Artistic murals would be incorporated on the east and south facades of the building.

Objective/Policy	Would the Project Conflict?
2001 Wilshire Community Plan	
	These features all add visual interest and provide architectural relief. At the street level, the building combines decorative metal panels, stonework, and landscaping to create a pedestrian oriented environment.

Source: Kimley-Horn, 2026
City of Los Angeles Department of City Planning, Wilshire Community Plan, adopted September 19, 2001.

Los Angeles Municipal Code

Development of the Project Site is subject to the constraints of the LAMC. The Project is requesting the following discretionary entitlements, reviews, permits, and approvals:

1. General Plan Amendment Pursuant to LAMC Section 11.5.6 of Chapter 1 and LAMC Section 13B.1.1 of Chapter 1A to change the Project Site's land use designation from Community Commercial to Regional Commercial.
2. Zone change pursuant to LAMC Section 12.32 of Chapter 1 and LAMC Section 13B.1.4 of Chapter 1A to change the Project Site's zoning from CR-1 and R4P-1 to C2-2.
3. Conditional Use Permit pursuant to LAMC Section 12.24.W.50 of Chapter 1 and LAMC Section 13B2.2 of Chapter 1A to permit a storage building for household goods in the C2 zone.
4. Project Review pursuant to LAMC Section 16.05 of Chapter 1 and LAMC Section 13B.2.4 of Chapter 1A for a Project creating more than 50,000 gross sf of non-residential floor area.

Zoning and Land Use

Currently, the Project Site's land use designation is Community Commercial, and it is currently split zoned with the eastern portion of the Project Site zoned as Limited Commercial, CR-1, and the western portion of the Project Site zoned Multiple Dwelling Zone, R4P-1. As part of the Project approval, the Project proposes to change the Project site's land use designation to Regional Commercial and to re-zone the Project Site entirely to Commercial Zone, C2-2. Storage buildings for household goods are permitted in the C2 zone with the approval of a CUP under LAMC Section 12.24.W.50. The Project will also obtain Project Review pursuant to LAMC Section 16.05 for creating more than 50,000 gross sf of nonresidential floor area. Approval of these entitlements ensures that the Project is consistent with the LAMC. Moreover, the proposed land use and zone changes would allow the Project Site to be redeveloped with a viable and desirable use consistent with surrounding land uses and with the Wilshire Community Plan and LAMC. The Project also complies with all other applicable requirements of the zoning code, such as height, setbacks, floor area ratio, bicycle and vehicular parking, and access and circulation. Therefore, the Project is consistent with the LAMC.

Conclusion

As shown above, the Project is consistent with the applicable land use plans, policies, and regulations. Therefore, impacts due to a conflict with any land use plan, policy, or regulation would be less than significant, and no mitigation would be required.

Cumulative Impacts

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

4.12 MINERAL RESOURCES

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

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

No Impact. The Project Site is not located in a surface mining district or MRZ-2 zone.[106] The Project Site is currently designated for Community Commercial land uses and not for mineral extraction land uses. Furthermore, the Project would not involve mineral extraction activities, nor are any such activities presently occurring on the Project Site. Additionally, there is no historic record of mineral extraction on the Project Site nor any known mineral deposits on the Project Site. Accordingly, the Project would not result in the loss of availability of a known mineral resource of statewide or regional importance. Therefore, no impact would occur, and no mitigation measures would be required.

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

No Impact. In addition to oil and gas resources, mineral resources of local value in the City include sand and gravel deposits and mining operations. Sand and gravel resources and mining operations are primarily concentrated in the Sylmar community of the north San Fernando Valley.[107] Sand and gravel resources do not occur in the section of the Los Angeles basin occupied by the Project Site. Because the Project would not encroach on the City's existing sand and gravel mining operations or known sand and gravel resources, it would not result in the loss of availability of these locally important mineral resources. Therefore, there would be no impact to locally important mineral resources, and no mitigation measures would be required.

Cumulative Impacts

Neither the Project Site nor the sites of the Related Projects are located within a City-designated Mineral Resource Zone or a mineral producing area as classified by the California Geological Survey, and as such neither the Project nor the Related Projects are expected to result in the loss of a locally important mineral resource recovery site. Furthermore, no mineral resources or extraction operations for such resources

[106] City of Los Angeles Department of City Planning, Los Angeles City General Plan Conservation Element, Exhibit A, Mineral Resources, Adopted September 2001.

[107] City of Los Angeles General Plan, Conservation Element, 2001. Appendix A, https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation_Element.pdf. Accessed November 11, 2025.

occur in the vicinity of the Project Site or the Related Projects. Therefore, the Project would not contribute considerably to cumulative mineral resources impacts, and cumulative mineral resources impacts would be less than significant.

4.13 NOISE

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

The analysis below is based on the *Noise and Vibration Assessment, 525 South Virgil Avenue Project* (Noise Report), prepared by Kimley-Horn, dated September 2026 and included as **Appendix I**.

Existing Noise Sources

The Project Site is in an urbanized area that is developed with a diverse mix of land uses. The Project Site is impacted by various noise sources. Mobile sources of noise, including traffic along 5th Street, Virgil Avenue, 6th Street, and Westmoreland Avenue, are the most common and prominent existing sources of noise at the Project Site and in the surrounding area. Other ambient existing sources of noise on and near the Project Site include parking lot, mechanical equipment noise (e.g., heating, ventilation, and air conditioning [HVAC] units), noise from existing nearby commercial, residential, and institutional uses, and other miscellaneous noise sources associated with typical urban activities (e.g., idling cars/trucks, pedestrians, car radios and music playing, dogs barking, etc.).

Noise Measurements

To establish baseline noise conditions at the Project Site and in the immediately surrounding area, Kimley-Horn conducted four short-term (15-minute) measurements and one long-term (24-hour) measurement.[108] The noise measurement sites were selected to be representative of the existing ambient noise levels at the noise-sensitive uses adjacent to the Project Site. The 15-minute daytime measurements were taken between 10:20 a.m. and 11:45 a.m. on Wednesday, May 28, 2025. The 24-hour measurement was taken between 12:35 p.m. on Wednesday, May 28, 2025, and 12:46 p.m. on Thursday, May 29, 2025. Measurements of L_{eq} are considered representative of the noise levels throughout the day. The average

[108] The ambient noise measurements were taken in accordance with LAMC Section 111.01 (Definitions), which requires the ambient noise to be measured over a period of at least 15 minutes.

noise levels measured at each location are listed in **Table 18***: Existing Noise Measurement Locations and Measurements.*

Table 18: Existing Noise Measurement Locations and Measurements

Site	Location	Measurement Period	Duration	Daytime Average L_{eq} (dBA)	Nighttime Average L_{eq} (dBA)	24-hour Average L_{eq} (dBA)
ST-1	Southwestern corner of 5th Street and Virgil Avenue	11:30 a.m. - 11:45 a.m.	15 minutes	58.1	-	-
ST-2	Adjacent to the Pilgram School parking lot and soccer field	10:20 a.m. - 10:35 a.m.	15 minutes	61.7	-	-
ST-3	Adjacent to 616 South Virgil Avenue	10:46 a.m. - 11:01 a.m.	15 minutes	68.4	-	-
ST-4	Adjacent to Westmore Manor Apartments	11:10 a.m. - 11:25 a.m.	15 minutes	64.7	-	-
LT	Center of the Project Site's northern boundary	12:35 p.m. on May 28, 2025 – 12:46 p.m. on May 29, 2025	24 hours	56.4	57.9	50.8

ST = short-term; LT = long-term
Source: Short-term noise measurements were taken by Kimley-Horn and Associates. The long-term noise measurement was taken by Kimley-Horn and Associates, May 28, 2025 to May 29, 2025. See **Appendix I** for noise measurement results.

Sensitive Receptors

Noise exposure standards and guidelines for various types of land uses reflect the varying noise sensitivities associated with each of these uses. The Noise Element defines sensitive receptors as single-family and multi-unit dwellings, long-term care facilities (including convalescent and retirement facilities), dormitories, motels, hotels, transient lodging, and other residential uses; houses of worship; hospitals; libraries; schools; auditoriums; concert halls; outdoor theaters; nature and wildlife preserves; and parks.[109] Sensitive receptors near the Project Site are shown in **Table 19:** *Sensitive Receptors* along with the Noise Measurement Location that represents each sensitive receptor.

Table 19: Sensitive Receptors

Receptor Description[1]	Representative Noise Measurement Location	Distance[2] and Direction from the Project
Sensitive Receptor 1 – Residential (500 S Westmoreland Avenue)	ST-1	44 feet to the north
Sensitive Receptor 2 – Residential (509, 511, 519, 523, 529, 533 S Westmoreland Avenue)	ST-4	80 feet to the west
Sensitive Receptor 3 – Residential (425, 429, 435, 443 Virgil Avenue, 3105 5th Street) and 434 and 444 S Westmoreland Avenue)	ST-1	212 feet to the north
Sensitive Receptor 4 – Puritan Reformed University (3000 W 6th Street)	ST-3	225 feet to the south
Sensitive Receptor 5 – Residential (418, 424, 436 S Virgil Avenue, 3055 W 5th Street)	ST-1	233 feet to the northeast
Sensitive Receptor 6 – Residential (531 and 537 S Commonwealth Avenue)	ST-2	250 feet to the east
Sensitive Receptor 7 – New Covenant Academy/ Doulos Mission Church (522, 530, and 550 S Shatto Place)	ST-4	250 feet to the west
Sensitive Receptor 8 – Residential (2968 W 6th Street and 620 S Virgil Avenue)	ST-3	254 feet to the southeast
Sensitive Receptor 9 – World Mission University (500 S Shatto	ST-4	260 feet to the northwest

[109] City of Los Angeles. *General Plan, Noise Element,* page 3-1, 1999.

Table 19: Sensitive Receptors

Receptor Description[1]	Representative Noise Measurement Location	Distance[2] and Direction from the Project
Place)		
Sensitive Receptor 10 – Residential (3163 W 5th Street, 456 S Shatto Place, 439, 433, and 423 S Westmoreland Avenue)	ST-4	267 feet to the northwest
Sensitive Receptor 11 – Residential (611 and 615 S Virgil Avenue)	ST-3	340 feet to the south
Sensitive Receptor 12 – St John Grace University (617 and 612 S Virgil Avenue)	ST-3	404 feet to the south
Sensitive Receptor 13 – Kidsbel (Educational Institution) (609 S Westmoreland Avenue)	ST-4	423 feet to the southwest
Sensitive Receptor 14 – Dongguk University Los Angeles / Ttokamsa Home Mission Church (434, 440, and S Shatto Place)	ST-4	435 feet to the northwest
Sensitive Receptor 15 – Immaculate Heart of Mary Preschool (426 S Commonwealth Avenue)	ST-2	490 feet to the northeast
Sensitive Receptor 16 – Pilgrim School/ New Central Church/ First Congregational Church of Los Angeles (540, 538, 532, 526, 520, 516, 510, 502 S Commonwealth Avenue)	ST-2	500 feet to the east

Source: Google Earth, 2025.
1. Receptor addresses obtained from City of Los Angeles Department of City Planning, Zone Information & Map Access System, http://zimas.lacity.org.
2. Distance measured from the property line of the Project Site to the nearest receptor property line.

Applicable Thresholds

Construction Noise

On-Site and Off-Site Construction. Pursuant to the City's Construction Noise and Vibration Updates to Thresholds and Methodology (Thresholds Update), on- and off-site construction noise occurring between the hours of 7:00 a.m. and 7:00 p.m. Monday through Friday and 8:00 a.m. and 6:00 p.m. on Saturdays shall not exceed an absolute threshold of 80 dBA L_{eq} at daytime noise sensitive uses. The City has not established a numerical threshold above ambient noise levels for construction activities.[110]

Operational Noise

On-Site Operations. Pursuant to LAMC Section 112.02 (Air Conditioning, Refrigeration, Heating, Pumping, Filtering Equipment) (Noise Regulations), the operation of any air conditioning, refrigeration, or heating equipment shall not create any noise which would cause the noise level of another occupied property to exceed the ambient noise level by more than 5 dBA. Pursuant to the LAMC and the Los Angeles CEQA Thresholds Guide, the significance criteria used in the noise analysis is an increase in the ambient noise level of 5 dBA (hourly L_{eq}) at the noise-sensitive uses. [111, 112]

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

[110] City of Los Angeles, Construction Noise and Vibration Updates to Thresholds and Methodology, page 15, 2024.
[111] City of Los Angeles, City of Los Angeles Municipal Code, Chapter XI: Noise Regulation, Section 112.02 (Air Conditioning, Refrigeration, Heating, Pumping, Filtering Equipment), https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-193902. Accessed November 25, 2025.
[112] City of Los Angeles, L.A. CEQA Thresholds Guide, page I.2-3, 2006.

project" noise levels fall within the "conditionally acceptable" or "normally acceptable" category at noise-sensitive uses.[113]

Composite Operational Noise. In addition, the City has determined to assess the significance of the Project's composite noise levels (on-site and off-site sources) based on whether the Project's composite noise levels create an increase in the ambient noise level of 3 dBA or 5 dBA CNEL (depending on where in the acceptable/unacceptable categories the noise levels fall as discussed above) at noise-sensitive receptors.[114]

Vibration

Increases in groundborne vibration levels attributable to the Project would be primarily associated with short-term construction-related activities. Project construction could result in varying degrees of temporary groundborne vibration, depending on the specific construction equipment used, the location of that equipment relative to the receptor, and the operations involved.

Structural Damage. Heavy construction equipment (e.g., a large bulldozer, caisson drill, and vibratory/sonic pile driver) would generate the highest vibration level of the equipment expected to be used for Project construction. With respect to potential building damage, pursuant to the Thresholds Update, construction vibration shall not exceed the following thresholds for the identified class of structures:[115]

- Fragile Buildings: 0.1 PPV
- Historic Buildings: 0.25 PPV
- Older[116] Residential Structures: 0.3 PPV
- New Residential Structures: 0.5 PPV
- Modern Industrial/Commercial Buildings: 0.5 PPV

There are two structures potentially eligible for listing in the National Register by the State Office of Historic Preservation and State Historical Resources Commission within a 250-foot radius of the Project Site: the mixed use commercial building at 3101 W. 6th Street (Sensitive Receptor 2D), which is located approximately 140 feet southwest of the Project Site across Westmoreland Avenue, and the multi-family residential building at 523 S. Westmoreland Avenue known as San Mor Manor (Sensitive Receptor 2B), which is located approximately 80 feet west of the Project Site across Westmoreland Avenue.[117] There are also other historic or potentially historic structures located further than 250 feet from the Project Site. All of the sensitive receptors that are historic or potentially historic were conservatively evaluated using the 0.25 PPV threshold for historic buildings.

Human Annoyance. Pursuant to the Thresholds Update, there is no numerical threshold related to human annoyance for construction activities occurring between the hours of 7:00 a.m. and 7:00 p.m. Monday

[113] City of Los Angeles, L.A. CEQA Thresholds Guide, page I.2-3, 2006.
[114] City of Los Angeles, L.A. CEQA Thresholds Guide, page I.2-3, 2006.
[115] City of Los Angeles, Construction Noise and Vibration Updates to Thresholds and Methodology, Attachment 2 – Thresholds, page 5, 2024.
[116] A building over 50 years can be considered an "older" residential structure. Source: City of Los Angeles, Construction Noise and Vibration Updates to Thresholds and Methodology, Attachment 2 – Thresholds, page 5, 2024.
[117] City of Los Angeles, Los Angeles Historic Resources Inventory. https://historicplacesla.lacity.org/report/9a525d48-e401-465d-b91c-7f36b8744acf. Accessed October 17, 2025.

through Friday, and between 8:00 a.m. and 6:00 p.m. on Saturdays and national holidays.[118] Project construction is anticipated to only occur during the allowable construction daytime hours. According to the City, intermittent human annoyance from construction activity is commonplace during daytime hours.[119]

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

Less than Significant

Construction

On-Site Construction Noise

Construction noise levels were based on typical noise levels generated by construction equipment published by the Federal Transit Administration (FTA) and the Federal Highway Administration (FHWA).

Construction noise typically occurs intermittently and varies depending on the nature or phase of construction (e.g., demolition, land clearing, grading, excavation). Noise generated by construction equipment, including earth movers and material handlers, can reach high levels that can affect noise-sensitive receptors near the construction site. Construction activities for the Project would include demolition, site preparation, grading and shoring, infrastructure improvements/detention system, building construction, paving, and architectural coating applications, as well as off-site driveway improvements. Noise levels associated with individual construction equipment expected to be used during Project construction are listed in **Table 20**: *Project Construction Equipment Noise Levels*.

It should be noted that the values shown in **Table 20** are for the equipment when operating at full power 50 feet from a sensitive receptor, without taking into account any intervening structures or topography that may reduce noise levels. Other primary sources of acoustical disturbance may include random incidents, which would last less than one minute (such as dropping of materials or the hydraulic movement of machinery lifts). It should also be noted that due to the constraints of the Project Site and standard construction practices, only a limited amount of equipment can operate on the Project Site at a particular time.

The FTA's Roadway Construction Noise Model (RCNM) was used to predict construction noise levels at 50 feet from all pieces of equipment to determine the loudest construction phase. Utilizing the reference noise level data from RCNM, the two construction phases with the highest calculated noise level (overlap of building construction and paving and overlap of shoring and grading) were modeled using the SoundPLAN Model to determine how the sound from construction equipment would propagate and to determine noise levels at the Project property lines. SoundPLAN provides detailed computer simulations of noise situations accounting for topography, noise sources, and intervening structures. Inputs to the SoundPLAN model included ground topography and ground type, existing and proposed intervening structures, noise source locations and heights, receiver locations, and sound power level data. Following the adoption of the Thresholds Update, noise from construction equipment was modeled as an area

[118] City of Los Angeles, Construction Noise and Vibration Updates to Thresholds and Methodology, page 19, 2024.
[119] City of Los Angeles, Construction Noise and Vibration Updates to Thresholds and Methodology, page 19, 2024.

source across the entire Project Site.[120] However, as shoring activities are only required in specific locations on the site, noise for shoring equipment has been modeled as area sources around the specified shoring locations, which consists of the perimeter of the site except for the eastern portion of the northern boundary. This analysis is appropriate because L_{eq} can be used to describe the noise level from the operation of each piece of equipment separately, and the levels can be combined to represent the noise level from all equipment operating at the Project Site concurrently during a given period.

Table 20: Project Construction Equipment Noise Levels

Construction Phase	Anticipated Equipment[1]	Typical Noise Level (dBA L_{max}) at 50 feet from Source	Usage Factor (%)[2]
Demolition	Excavator	87	40%
	Loader	81	40%
Site Preparation	Grader	77	40%
	Excavator	87	40%
	Loader	81	40%
Shoring	Vibratory/Sonic Pile Driver	106	20%
	Caisson Drill	102	20%
	Skid Steer	85	50%
	Excavator	87	40%
	Forklift	89	40%
Grading	Grader	77	40%
	Backhoe	84	40%
	Loader	81	40%
Infrastructure Improvements/ Detention System	Trencher	85	50%
	Excavator	87	40%
	Loader	81	40%
Building Construction	Forklift	89	40%
	Crane	79	16%
	Concrete Pump	75	50%
	Concrete Mixer	82	40%
Paving	Loader	81	40%
	Pump	75	50%
	Concrete Mixer	82	40%
	Paver	84	20%
Architectural Coating	Air Compressor	68	40%

1. Equipment compiled based on air quality modeling defaults and contractor input.
2. Usage factor represents the percentage of time the equipment would be operating at full power and is based on the FHWA RCNM User Guide.

Source: Federal Highway Administration, *Roadway Construction Noise Model 2.0,*

The sensitive receptors surrounding the Project Site consist of multiple stories. To determine the potential noise impacts at upper floors of sensitive receptors, the SoundPLAN model was utilized to calculate construction noise levels at all levels of the nearest sensitive receptors. Noise levels at other receptors surrounding the Project Site would be located further away and would experience lower construction noise levels than the modeled receptors. **Table 21:** *Project Construction Noise Levels,* shows the estimated exterior noise levels at the nearest receptors for the two worst-case construction noise scenarios.

[120] City of Los Angeles, Construction Noise and Vibration Updates to Thresholds and Methodology, Attachment 3, page 5, 2024.

Table 21: Project Construction Noise Levels

Sensitive Receptor	Grading and Shoring Noise Level at Receptor (L_{eq})[1]	Building Construction and Paving Noise Level at Receptor (L_{eq})[1]	Noise Threshold (dBA L_{eq})[2]	Exceeded?
1 – Residential (500 S Westmoreland Avenue)			80	No
Floor 1	61.8	61.0		
Floor 2	63.1	62.5		
Floor 3	63.9	63.4		
Floor 4	64.2	63.8		
2 – Residential (509, 511, 519, 523, 529, 533 S Westmoreland Avenue)			80	No
Floor 1	60.2	59.3		
Floor 2	61.4	60.3		
Floor 3	62.2	61.1		
Floor 4	62.5	61.5		
3 – Residential (425, 429, 435, 443 Virgil Avenue, 3105 5th Street) and 434 and 444 S Westmoreland Avenue)	43.4	44.8	80	No
Floor 1	43.6	46.3		
Floor 2	44.0	45.8		
Floor 3	44.7	46.3		
Floor 4				
4 – Puritan Reformed University (3000 W 6th Street)			80	No
Floor 1	48.9	48.8		
Floor 2	50.4	50.2		
Floor 3	52.6	52.9		
5 – Residential (418, 424, 436 S Virgil Avenue, 3055 W 5th Street)			80	No
Floor 1	47.2	48.3		
Floor 2	47.7	48.8		
Floor 3	46.0	47.1		
Floor 4	46.5	47.6		
Floor 5	47.0	48.2		
Floor 6	48.0	49.0		
6 – Residential (531 and 537 S Commonwealth Avenue)			80	No
Floor 1	52.3	52.4		
Floor 2	52.8	52.9		
7 – New Covenant Academy/ Doulos Mission Church (522, 530, and 550 S Shatto Place)			80	No
Floor 1	43.6	43.6		
8 – Residential (2968 W 6th Street and 620 S Virgil Avenue)			80	No
Floor 1	51.0	51.6		
Floor 2	51.7	52.2		
Floor 3	52.4	52.8		
Floor 4	52.8	53.3		
Floor 5	53.3	53.8		
Floor 6	53.8	54.2		
Floor 7	54.3	54.7		
9 – World Mission University (500 S Shatto Place)			80	No
Floor 1	51.3	51.6		
Floor 2	51.8	52.1		

Table 21: Project Construction Noise Levels

Sensitive Receptor	Grading and Shoring Noise Level at Receptor (L_{eq})[1]	Building Construction and Paving Noise Level at Receptor (L_{eq})[1]	Noise Threshold (dBA L_{eq})[2]	Exceeded?
Floor 3	52.5	52.6		
Floor 4	53.2	53.3		
10 – Residential (3163 W 5th Street, 456 S Shatto Place, 439, 433, and 423 S Westmoreland Avenue)			80	No
Floor 1	47.9	46.5		
Floor 2	48.3	47.0		
Floor 3	48.8	47.4		
11 – Residential (611 and 615 S Virgil Avenue)			80	No
Floor 1	45.9	46.6		
Floor 2	47.2	47.7		
Floor 3	48.7	49.3		
Floor 4	49.3	49.9		
Floor 5	49.9	50.3		
12 – St John Grace University (617 and 612 S Virgil Avenue)			80	No
Floor 1	45.7	46.3		
Floor 2	46.6	47.1		
13 – Kidsbel (Educational Institution) (609 S Westmoreland Avenue)			80	No
Floor 1	44.3	43.1		
Floor 2	44.9	43.9		
14 – Dongguk University Los Angeles/ Ttokamsa Home Mission Church (434, 440, and S Shatto Place)	27.0	27.0	80	No
Floor 1	27.0	27.0		
Floor 2	27.3	27.3		
Floor 3	28.9	28.6		
Floor 4				
15 – Immaculate Heart of Mary Preschool (426 S Commonwealth Avenue)	27.1	27.5	80	No
Floor 1	29.0	29.4		
Floor 2				
16 – Pilgrim School/ New Central Church/ First Congregational Church of Los Angeles (540, 538, 532, 526, 520, 516, 510, 502 S Commonwealth Avenue)	44.9	44.7	80	No
Floor 1				

1. The construction equipment for the worst-case construction phases were conservatively modeled as an area source across the entire Project Site in SoundPLAN.
2. Per the Thresholds Update, daytime construction noise shall be limited to a maximum of 80 dBA L_{eq} at noise-sensitive uses.

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

As shown in **Table 21,** the estimated exterior noise levels at the nearest receptors for the worst-case construction noise scenarios would not exceed the Thresholds Update significance criterion of 80 dBA L_{eq}. In addition, construction-related noise would be temporary and would not result in a permanent increase in ambient noise levels in the area. Construction activities would also be prohibited between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday and between 6:00 p.m. and 8:00 a.m. on Saturdays and

national holidays, and at all times on Sundays in accordance with City regulations. The City's permitted hours of construction are required in recognition that construction activities undertaken during daytime hours are a typical part of living in an urban environment and do not cause a significant impact. Therefore, because the Project will comply with the City's allowable construction hours, the Project would not result in the generation of a substantial temporary increase in ambient noise levels in the Project site vicinity in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies during construction. Thus, construction noise impacts would be less than significant and no mitigation is required.

Off-Site Construction Noise

In addition to on-site construction noise, the Project would generate mobile-source noise from delivery/haul trucks and construction workers traveling to and from the Project Site during the Project's construction. Trucks would travel to and from the Project Site using Virgil Avenue, Wilshire Boulevard, and Hoover Street. Haul and delivery trucks and construction workers are expected to arrive at the Project Site before construction starts and leave when construction ends, and thus would not overlap with the noise generated by the Project's construction equipment. It is reasonable to assume that workers would already have arrived at the Project Site to begin construction activities prior to the arrival of haul and delivery trucks. The greatest contributor to on-road traffic noise during construction would be haul and delivery trucks arriving to the Project Site via Virgil Avenue, Wilshire Boulevard, and Hoover Street. However, this analysis conservatively considers noise generated by both haul and vendor trucks and worker vehicles (passenger vehicles).

According to modeling assumptions based on the air quality assessment prepared by Kimley-Horn in 2025, the construction phase with the highest assumed number of trucks would be grading, when it is anticipated that there would be up to 100 daily one-way haul truck trips, 100 daily one-way vendor truck trips, and 20 daily one-way worker trips accessing the Project Site. Conservatively assuming that all the daily vehicle trips would pass through the same roadway segment within a one hour period, the estimated noise level from the grading trips would be 73.1 dBA L_{eq} at 20 feet from the roadway centerline. This worst-case noise level would not exceed the City's Thresholds Update significance criterion of 80 dBA L_{eq} for on- and off-site construction activities. Therefore, noise impacts from off-site vendor trucks and worker vehicles would be less than significant and no mitigation measures are required.

Operations

The proposed Project consists of an eight-story self-storage facility. Project operations would result in the generation of noise from rooftop mechanical equipment (e.g., HVAC, etc.), an electrical power transformer, activities associated with loading and unloading storage items and parking areas (i.e., car door slamming, car radios, engine start-up, and car pass-by), and off-site traffic noise. Although these noise sources would be consistent with existing noise sources in the Project Site vicinity, existing on-site operational noise sources have not been accounted for in the analysis below to provide a conservative analysis. The Project will be open seven days a week. The front office will be open to the public and customers from approximately 9:00 a.m. to 6:00 p.m. daily. The facility will be limited to customers and only between the hours of approximately 6:00 a.m. to 10:00 p.m. daily.

On-Site Mechanical Equipment Noise

Mechanical equipment (e.g., HVAC equipment) is anticipated to operate in a steady-state manner and is anticipated to be located on the self-storage facility rooftop to regulate the facility's climate. Mechanical equipment (e.g., HVAC equipment) typically generates noise levels of approximately 52 dBA at 50 feet.[121] Pursuant to LAMC Section 112.02 (Air Conditioning, Refrigeration, Heating, Pumping, Filtering Equipment), the operation of any air conditioning, refrigeration, or heating equipment shall not create any noise which would cause the noise level at another occupied property to exceed the ambient noise level by 5 dBA. Noise levels that would be generated by the mechanical equipment have conservatively been calculated without accounting for shielding that would be provided by potential screening or architectural features and are shown in **Table 22:** *Mechanical Equipment Noise Levels.* As shown in **Table 22**, the mechanical equipment noise levels would not increase the ambient noise levels at any of the sensitive receptors beyond the acceptable levels (5 dBA over ambient), if at all. As such, mechanical equipment-related noise would not result in the generation of a substantial permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance. Therefore, noise impacts from mechanical equipment would be less than significant, and no mitigation is required.

Table 22: Mechanical Equipment Noise Levels

Sensitive Receptor	Distance to Receptor (feet) [1]	Noise at Receptor (dBA)[2]	Ambient Noise (dBA)[3]	Ambient + Project Noise at Receptor (dBA)	Incremental Increase (dBA)	Incremental Increase Threshold (dBA)	Significant?
1 – Residential (500 S Westmoreland Avenue)	147	42.6	58.1	58.2	0.1	5.0	No
2 – Residential (509, 511, 519, 523, 529, 533 S Westmoreland Avenue)	165	41.6	64.7	64.7	0.0	5.0	No
3 – Residential (425, 429, 435, 443 Virgil Avenue, 3105 5th Street) and 434 and 444 S Westmoreland Avenue)	325	35.7	58.1	58.1	0.0	5.0	No
4 – Puritan Reformed University (3000 W 6th Street)	263	37.6	68.4	68.4	0.0	5.0	No
5 – Residential (418, 424, 436 S Virgil Avenue, 3055 W 5th Street)	396	34.0	58.1	58.1	0.0	5.0	No
6 – Residential (531 and 537 S Commonwealth Avenue)	345	35.2	61.7	61.7	0.0	5.0	No
7 – New Covenant Academy/ Doulos Mission Church (522, 530, and 550 S Shatto Place)	325	35.7	64.7	64.7	0.0	5.0	No
8 – Residential (2968 W 6th Street and 620 S Virgil Avenue)	335	35.5	68.4	68.4	0.0	5.0	No
9 – World Mission University (500 S Shatto Place)	373	34.5	64.7	64.7	0.0	5.0	No
10 – Residential (3163 W 5th Street, 456 S Shatto Place, 439, 433, and 423 S Westmoreland Avenue)	357	34.9	64.7	64.7	0.0	5.0	No
11 – Residential (611 and 615 S Virgil Avenue)	380	34.4	68.4	68.4	0.0	5.0	No

[121] Elliott H. Berger, Rick Neitzel, and Cynthia A. Kladden. Noise Navigator Sound Level Database with Over 1700 Measurement Values. 2010.

Table 22: Mechanical Equipment Noise Levels

Sensitive Receptor	Distance to Receptor (feet) [1]	Noise at Receptor (dBA)[2]	Ambient Noise (dBA)[3]	Ambient + Project Noise at Receptor (dBA)	Incremental Increase (dBA)	Incremental Increase Threshold (dBA)	Significant?
12 – St John Grace University (617 and 612 S Virgil Avenue)	468	32.6	68.4	68.4	0.0	5.0	No
13 – Kidsbel (Educational Institution) (609 S Westmoreland Avenue)	447	33.0	64.7	64.7	0.0	5.0	No
14 – Dongguk University Los Angeles/ Ttokamsa Home Mission Church (434, 440, and S Shatto Place)	613	30.2	64.7	64.7	0.0	5.0	No
15 – Immaculate Heart of Mary Preschool (426 S Commonwealth Avenue)	680	29.3	61.7	61.7	0.0	5.0	No
16 – Pilgrim School/ New Central Church/ First Congregational Church of Los Angeles (540, 538, 532, 526, 520, 516, 510, 502 S Commonwealth Avenue)	645	29.8	61.7	61.7	0.0	5.0	No
1. Distance measured from the center of the Project's roof to the nearest sensitive receptor property line. 2. Distance attenuation calculated assuming reference noise level of 52 dBA L_{eq} at 50 feet. 3. Refer to **Table 18** and **Table 19** for representative ambient noise levels.							
Source: Elliott H. Berger, Rick Neitzel, and Cynthia A. Kladden. Noise Navigator Sound Level Database with Over 1700 Measurement Values. 2010.							

On-Site Transformer Noise

A transformer is anticipated to be located on the northeastern corner of the Project Site and would ensure electricity is safely transferred from the electrical grid to the self-storage facility. A transformer would generate noise levels of approximately 60 dBA at 3.28 feet.[122] Noise levels have been calculated and provided in **Table 23:** *Transformer Noise Levels*. As shown in **Table 23**, the transformer noise levels would not increase the ambient noise levels at any of the sensitive receptors beyond the acceptable levels (5 dBA over ambient), if at all. As such, transformer-related noise would not result in the generation of a substantial permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance. Therefore, transformer related noise impacts would be less than significant, and no mitigation is required.

Table 23: Transformer Noise Levels

Sensitive Receptor	Distance to Receptor (feet)[1]	Noise at Receptor (dBA)[2]	Ambient Noise (dBA)[3]	Ambient + Project Noise (dBA)	Incremental Increase (dBA)	Incremental Increase Threshold (dBA)	Significant?
1 – Residential (500 S Westmoreland Avenue)	173	25.6	58.1	58.1	0.0	5.0	No
2 – Residential (509, 511, 519, 523, 529, 533 S Westmoreland Avenue)	410	18.1	64.7	64.7	0.0	5.0	No
3 – Residential (425, 429, 435, 443 Virgil Avenue, 3105 5th Street) and 434	238	22.8	58.1	58.1	0.0	5.0	No

[122] National Electrical Manufacturers Association. NEMA TP 80050-2013 (R2024), Transformers, Step Voltage Regulators, and Reactors. 2025.

Table 23: Transformer Noise Levels

Sensitive Receptor	Distance to Receptor (feet)[1]	Noise at Receptor (dBA)[2]	Ambient Noise (dBA)[3]	Ambient + Project Noise (dBA)	Incremental Increase (dBA)	Incremental Increase Threshold (dBA)	Significant?
and 444 S Westmoreland Avenue)							
4 – Puritan Reformed University (3000 W 6th Street)	378	18.8	68.4	68.4	0.0	5.0	No
5 – Residential (418, 424, 436 S Virgil Avenue, 3055 W 5th Street)	260	22.0	58.1	58.1	0.0	5.0	No
6 – Residential (531 and 537 S Commonwealth Avenue)	324	20.1	61.7	61.7	0.0	5.0	No
7 – New Covenant Academy/ Doulos Mission Church (522, 530, and 550 S Shatto Place)	570	15.2	64.7	64.7	0.0	5.0	No
8 – Residential (2968 W 6th Street and 620 S Virgil Avenue)	403	18.2	68.4	68.4	0.0	5.0	No
9 – World Mission University (500 S Shatto Place)	590	14.9	64.7	64.7	0.0	5.0	No
10 – Residential (3163 W 5th Street, 456 S Shatto Place, 439, 433, and 423 S Westmoreland Avenue)	478	16.7	64.7	64.7	0.0	5.0	No
11 – Residential (611 and 615 S Virgil Avenue)	490	16.5	68.4	68.4	0.0	5.0	No
12 – St John Grace University (617 and 612 S Virgil Avenue)	590	14.9	68.4	68.4	0.0	5.0	No
13 – Kidsbel (Educational Institution) (609 S Westmoreland Avenue)	635	14.3	64.7	64.7	0.0	5.0	No
14 – Dongguk University Los Angeles/ Ttokamsa Home Mission Church (434, 440, and S Shatto Place)	745	12.9	64.7	64.7	0.0	5.0	No
15 – Immaculate Heart of Mary Preschool (426 S Commonwealth Avenue)	540	15.7	61.7	61.7	0.0	5.0	No
16 – Pilgrim School/ New Central Church/ First Congregational Church of Los Angeles (540, 538, 532, 526, 520, 516, 510, 502 S Commonwealth Avenue)	587	14.9	61.7	61.7	0.0	5.0	No

1. Distance measured from the transformer on the Project Site plan to the nearest property line of the sensitive receptor.
2. Distance attenuation calculated assuming reference noise level of 60 dBA L_{eq} at 3.28 feet for transformers with an apparent power between 1,001 to 1,500 kVA.
3. Refer to **Table 18** and **Table 19** for representative ambient noise levels.

Source for reference level: National Electrical Manufacturers Association. *NEMA TP 80050-2013 (R2024), Transformers, Step Voltage Regulators, and Reactors*. 2025.

Storage Loading and Unloading Activities

Self-storage unit patrons and leasers would primarily commute to the Project Site via private vehicles or small single-unit truck rentals (e.g., U-Haul trucks) to drop off or pick up their items from the storage units. The patrons and leasers would load and unload their vehicle within the ground-level parking garage, which would be open along the driveways to provide drive-through access from Westmoreland Avenue to Virgil Avenue and vice versa. As there is no designated loading area, it is assumed that loading/unloading activities could occur at any location within the parking garage. Loading/unloading activities would generate noise levels up to approximately 61 dBA at a distance of 50 feet.[123] The storage loading and unloading noise levels at the nearest sensitive receptors are summarized in **Table 24:** *Storage Loading and Unloading Noise Levels*.

Table 24: Storage Loading and Unloading Noise Levels

Sensitive Receptor	Distance to Receptor (feet)[1]	Loading/ Unloading Noise (dBA)[2]	Ambient Noise (dBA)[3]	Ambient + Project Noise (dBA)	Incremental Increase (dBA)	Incremental Increase Threshold (dBA)	Significant?
1 – Residential (500 S Westmoreland Avenue)	95	55.4	58.1	60.0	1.9	5.0	No
2 – Residential (509, 511, 519, 523, 529, 533 S Westmoreland Avenue)	95	55.4	64.7	65.2	0.5	5.0	No
3 – Residential (425, 429, 435, 443 Virgil Avenue, 3105 5th Street) and 434 and 444 S Westmoreland Avenue)	248	47.1	58.1	58.4	0.3	5.0	No
4 – Puritan Reformed University (3000 W 6th Street)	330	44.6	68.4	68.4	0.0	5.0	No
5 – Residential (418, 424, 436 S Virgil Avenue, 3055 W 5th Street)	278	46.1	58.1	58.4	0.3	5.0	No
6 – Residential (531 and 537 S Commonwealth Avenue)	294	45.6	61.7	61.8	0.1	5.0	No
7 – New Covenant Academy/ Doulos Mission Church (522, 530, and 550 S Shatto Place)	255	46.8	64.7	64.8	0.1	5.0	No
8 – Residential (2968 W 6th Street and 620 S Virgil Avenue)	355	44.0	68.4	68.4	0.0	5.0	No
9 – World Mission University (500 S Shatto Place)	288	45.8	64.7	64.8	0.1	5.0	No
10 – Residential (3163 W 5th Street, 456 S Shatto Place, 439, 433, and 423 S Westmoreland Avenue)	283	45.9	64.7	64.8	0.1	5.0	No
11 – Residential (611 and 615 S Virgil Avenue)	441	42.1	68.4	68.4	0.0	5.0	No

[123] Kariel, H. G. Noise in Rural Recreational Environments. Canadian Acoustics 19(5), 3-10. 1991.

Table 24: Storage Loading and Unloading Noise Levels

Sensitive Receptor	Distance to Receptor (feet)[1]	Loading/ Unloading Noise (dBA)[2]	Ambient Noise (dBA)[3]	Ambient + Project Noise (dBA)	Incremental Increase (dBA)	Incremental Increase Threshold (dBA)	Significant?
12 – St John Grace University (617 and 612 S Virgil Avenue)	540	40.3	68.4	68.4	0.0	5.0	No
13 – Kidsbel (Educational Institution) (609 S Westmoreland Avenue)	456	41.8	64.7	64.7	0.0	5.0	No
14 – Dongguk University Los Angeles / Ttokamsa Home Mission Church (434, 440, and S Shatto Place)	530	40.5	64.7	64.7	0.0	5.0	No
15 – Immaculate Heart of Mary Preschool (426 S Commonwealth Avenue)	560	40.0	61.7	61.7	0.0	5.0	No
16 – Pilgrim School/ New Central Church/ First Congregational Church of Los Angeles (540, 538, 532, 526, 520, 516, 510, 502 S Commonwealth Avenue)	573	39.8	61.7	61.7	0.0	5.0	No
1. Distance measured from the parking lot area on the Project Site plan to the nearest property line of the sensitive receptor. 2. Distance attenuation calculated assuming reference noise level of 61 dBA L_{eq} at 50 feet for loading/unloading activities. 3. Refer to **Table 18** and **Table 19** for representative ambient noise levels.							
Source for reference level: Kariel, H. G. *Noise in Rural Recreational Environments.* Canadian Acoustics 19(5), 3-10. 1991.							

As shown in **Table 24**, noise levels from loading and unloading activities would not increase the ambient noise levels at any of the sensitive receptors beyond the acceptable levels (5 dBA over ambient). Additionally, storage loading and unloading activities would occur periodically and would not be an ongoing, consistent noise source. Project storage loading and unloading activities would not generate a substantial permanent increase in ambient noise levels in the Project vicinity in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Thus, impacts would be less than significant.

On-Site Parking

Passenger vehicles would access the ground-floor parking garage via a driveway on Westmoreland Avenue and Virgil Avenue. Noises associated with parking activities include noise associated with vehicles starting and stopping, vehicle doors closing, car horns and car alarms, and conversations. Noise levels within the parking facilities would fluctuate with the amount of automobile and human activity. The noise levels from these activities typically range from 53 to 61 dBA and are short-term.[124] The noise attributable to parking lot activity is summarized in **Table 25:** *Parking Lot Noise Levels*.

[124] Kariel, H. G. *Noise in Rural Recreational Environments*, Canadian Acoustics 19(5), 3-10. 1991.

Table 25: Parking Lot Noise Levels

Sensitive Receptor	Distance to Receptor (feet)[1]	Parking Lot Noise (dBA)[2]	Ambient Noise (dBA)[3]	Ambient + Project Noise (dBA)	Incremental Increase (dBA)	Incremental Increase Threshold (dBA)	Significant?
1 – Residential (500 S Westmoreland Avenue)	81	56.8	58.1	60.5	2.4	5.0	No
2 – Residential (509, 511, 519, 523, 529, 533 S Westmoreland Avenue)	248	47.1	64.7	64.8	0.1	5.0	No
3 – Residential (425, 429, 435, 443 Virgil Avenue, 3105 5th Street) and 434 and 444 S Westmoreland Avenue)	247	47.1	58.1	58.4	0.3	5.0	No
4 – Puritan Reformed University (3000 W 6th Street)	304	45.3	68.4	68.4	0.0	5.0	No
5 – Residential (418, 424, 436 S Virgil Avenue, 3055 W 5th Street)	278	46.1	58.1	58.4	0.3	5.0	No
6 – Residential (531 and 537 S Commonwealth Avenue)	315	45.0	61.7	61.8	0.1	5.0	No
7 – New Covenant Academy/ Doulos Mission Church (522, 530, and 550 S Shatto Place)	407	42.8	64.7	64.7	0.0	5.0	No
8 – Residential (2968 W 6th Street and 620 S Virgil Avenue)	350	44.1	68.4	68.4	0.0	5.0	No
9 – World Mission University (500 S Shatto Place)	440	42.1	64.7	64.7	0.0	5.0	No
10 – Residential (3163 W 5th Street, 456 S Shatto Place, 439, 433, and 423 S Westmoreland Avenue)	372	43.6	64.7	64.7	0.0	5.0	No
11 – Residential (611 and 615 S Virgil Avenue)	415	42.6	68.4	68.4	0.0	5.0	No
12 – St John Grace University (617 and 612 S Virgil Avenue)	475	41.4	68.4	68.4	0.0	5.0	No
13 – Kidsbel (Educational Institution) (609 S Westmoreland Avenue)	487	41.2	64.7	64.7	0.0	5.0	No
14 – Dongguk University Los Angeles/ Ttokamsa Home Mission Church (434, 440, and S Shatto Place)	640	38.9	64.7	64.7	0.0	5.0	No
15 – Immaculate Heart of Mary Preschool (426 S Commonwealth Avenue)	550	40.2	61.7	61.7	0.0	5.0	No
16 – Pilgrim School/ New Central Church/ First Congregational Church of Los Angeles (540, 538, 532,	605	39.3	61.7	61.7	0.0	5.0	No

Table 25: Parking Lot Noise Levels

Sensitive Receptor	Distance to Receptor (feet)[1]	Parking Lot Noise (dBA)[2]	Ambient Noise (dBA)[3]	Ambient + Project Noise (dBA)	Incremental Increase (dBA)	Incremental Increase Threshold (dBA)	Significant?
526, 520, 516, 510, 502 S Commonwealth Avenue)							
1. Distance measured from the nearest parking spaces on the Project Site plan to the nearest property line of the sensitive receptor. 2. Distance attenuation calculated assuming reference noise level of 61 dBA L_{eq} at 50 feet for parking lot noise sources. 3. Refer to **Table 18** and **Table 19** for representative ambient noise levels.							
Source for reference level: Kariel, H. G., Noise in Rural Recreational Environments. Canadian Acoustics 19(5), 3-10. 1991.							

As shown in **Table 25**, noise levels from the on-site parking activities would not exceed the acceptable 5 dBA over ambient increase threshold at any of the sensitive receptors. Therefore, noise levels generated by Project parking activities would not generate a substantial permanent increase in ambient noise levels within the Project vicinity in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Impacts would be less than significant.

On-Site Composite Noise

An evaluation of the Project's composite noise levels, including all on-site Project-related noise sources plus the existing ambient level, was conducted to identify the potential maximum Project-related noise level increase that may occur at noise-sensitive receptor locations. The overall sound environment of the areas surrounding the Project Site would include contributions from each onsite noise source associated with the operation of the Project. On-site noise sources associated with operation of the Project would include the use of mechanical equipment and a transformer, storage loading and unloading activities, and on-site parking. **Table 26:** *Composite On-Site Noise Levels* presents the estimated composite noise from on-site Project-related noise sources at noise sensitive receptors.

Table 26 shows the Project's cumulative increase would not exceed the 5 dBA threshold at any sensitive receptors. Thus, composite operational noise levels would not result in the generation of a substantial permanent increase in ambient noise levels in the vicinity of the Project Site in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Therefore, the on-site composite operational noise level impacts would be less than significant.

Table 26: Composite On-Site Noise Levels

Sensitive Receptor	Mechanical Equipment (dBA)	Transformer (dBA)	Loading/ Unloading (dBA)	Parking Lot (dBA)	Ambient Level (dBA)[1]	Ambient + Project Noise (dBA)	Incremental Increase (dBA)	Incremental Increase Threshold (dBA)	Significant?
1 – Residential (500 S Westmoreland Avenue)	42.6	25.6	55.4	56.8	58.1	61.7	3.6	5.0	No
2 – Residential (509, 511, 519, 523, 529, 533 S Westmoreland Avenue)	41.6	18.1	55.4	47.1	64.7	65.3	0.6	5.0	No
3 – Residential (425, 429, 435, 443 Virgil Avenue, 3105 5th Street) and 434 and 444 S Westmoreland Avenue)	35.7	22.8	47.1	47.1	58.1	58.8	0.7	5.0	No
4 – Puritan Reformed University (3000 W 6th Street)	37.6	18.8	44.6	45.3	68.4	68.4	0.0	5.0	No
5 – Residential (418, 424, 436 S Virgil Avenue, 3055 W 5th Street)	34.0	22.0	46.1	46.1	58.1	58.6	0.5	5.0	No
6 – Residential (531 and 537 S Commonwealth Avenue)	35.2	20.1	45.6	45.0	61.7	61.9	0.2	5.0	No
7 – New Covenant Academy/ Doulos Mission Church (522, 530, and 550 S Shatto Place)	35.7	15.2	46.8	42.8	64.7	64.8	0.1	5.0	No
8 – Residential (2968 W 6th Street and 620 S Virgil Avenue)	35.5	18.2	44.0	44.1	68.4	68.4	0.0	5.0	No
9 – World Mission University (500 S Shatto Place)	34.5	14.9	45.8	42.1	64.7	64.8	0.1	5.0	No
10 – Residential (3163 W 5th Street, 456 S Shatto Place, 439, 433, and 423 S Westmoreland Avenue)	34.9	16.7	45.9	43.6	64.7	64.8	0.1	5.0	No
11 – Residential (611 and 615 S Virgil Avenue)	34.4	16.5	42.1	42.6	68.4	68.4	0.0	5.0	No

Table 26: Composite On-Site Noise Levels

Sensitive Receptor	Mechanical Equipment (dBA)	Transformer (dBA)	Loading/ Unloading (dBA)	Parking Lot (dBA)	Ambient Level (dBA)[1]	Ambient + Project Noise (dBA)	Incremental Increase (dBA)	Incremental Increase Threshold (dBA)	Significant?
12 – St John Grace University (617 and 612 S Virgil Avenue)	32.6	14.9	40.3	41.4	68.4	68.4	0.0	5.0	No
13 – Kidsbel (Educational Institution) (609 S Westmoreland Avenue)	33.0	14.3	41.8	41.2	64.7	64.7	0.0	5.0	No
14 – Dongguk University Los Angeles/ Ttokamsa Home Mission Church (434, 440, and S Shatto Place)	30.2	12.9	40.5	38.9	64.7	64.7	0.0	5.0	No
15 – Immaculate Heart of Mary Preschool (426 S Commonwealth Avenue)	29.3	15.7	40.0	40.2	61.7	61.8	0.1	5.0	No
16 – Pilgrim School/ New Central Church/ First Congregational Church of Los Angeles (540, 538, 532, 526, 520, 516, 510, 502 S Commonwealth Avenue)	29.8	14.9	39.8	39.3	61.7	61.8	0.1	5.0	No

1. See **Table 18** and **Table 19** for representative ambient noise levels.

Off-Site Traffic Noise

Implementation of the Project would generate increased traffic volumes along nearby roadway segments. According to the Average Daily Traffic (ADT) Volumes provided in the Transportation Assessment prepared by Gibson Transportation Consulting (2026),[125] the Project would increase the ADT volume, which would result in noise increases on Project Site study area roadways. Traffic noise levels on roadways primarily affected by Project-generated trips were calculated using the FHWA's Highway Noise Prediction Model (FHWA-RD-77-108). Traffic noise modeling shown in **Table 27**: *Existing and Existing Plus Project Traffic Noise Levels*, traffic-generated noise levels on Project Site area roadways would range between

56.1 dBA CNEL and 68.1 dBA CNEL at 50 feet from the roadway centerline. The Project would result in a maximum increase of 0.1 dBA CNEL along 5th Street between Westmoreland Avenue and Virgil Avenue, 5th Street east of Virgil Avenue, Westmoreland Avenue north of 5th Street, Westmoreland Avenue between 5th Street and 6th Street, and Virgil Avenue south of 6th Street. This 0.1 dBA CNEL increase is well below the 3 dBA CNEL and 5 dBA CNEL thresholds specified in the L.A. CEQA Thresholds Guide (2006).[126] Therefore, noise impacts from off-site traffic noise would be less than significant, and no mitigation is required.

Table 27: Existing and Existing Plus Project Traffic Noise Levels

Roadway Segment	Existing		Existing + Project		Noise Compatibility	Incremental Increase	Significant Impact?[2]
	ADT	dBA CNEL[1]	ADT	dBA CNEL[1]			
5th Street west of Westmoreland Avenue	2,110	56.1	2,154	56.1	Normally Acceptable	0.0	No
5th Street between Westmoreland Avenue and Virgil Avenue	2,110	56.1	2,175	56.2	Normally Acceptable	0.1	No
5th Street east of Virgil Avenue	2,320	56.5	2,384	56.6	Normally Acceptable	0.1	No
6th Street west of Westmoreland Avenue	25,760	68.1	25,804	68.1	Normally Acceptable	0.0	No
6th Street between Westmoreland Avenue to Virgil Avenue	25,760	68.1	25,760	68.1	Normally Acceptable	0.0	No
6th Street east of Virgil Avenue	25,760	68.1	25,824	68.1	Conditionally Acceptable	0.0	No
Westmoreland Avenue north of 5th Street	4,180	59.0	4,244	59.1	Normally Acceptable	0.1	No
Westmoreland Avenue between 5th Street and 6th Street	5,820	60.5	5,993	60.6	Normally Acceptable	0.1	No

[125] Gibson Transportation Consulting. Transportation Assessment. 2026.
[126] City of Los Angeles, L.A. CEQA Thresholds Guide, 2006, page I.2-3.

Table 27: Existing and Existing Plus Project Traffic Noise Levels

Roadway Segment	Existing		Existing + Project		Noise Compatibility	Incremental Increase	Significant Impact?[2]
	ADT	dBA CNEL[1]	ADT	dBA CNEL[1]			
Westmoreland Avenue south of 6th Street	6,400	60.9	6,444	60.9	Normally Acceptable	0.0	No
Virgil Avenue north of 5th Street	15,320	65.8	15,384	65.8	Conditionally Acceptable	0.1	No
Virgil Avenue between 5th Street and 6th Street	15,320	65.8	15,428	65.8	Normally Acceptable	0.1	No
Virgil Avenue south of 6th Street	19,020	66.7	19,064	66.8	Conditionally Acceptable	0.0	No

ADT = average daily trips; dBA = A-weighted decibels; CNEL= Community Noise Equivalent Noise Level

1. Traffic noise levels are at 50 feet from the roadway centerline.
2. A significant impact would occur if the existing plus project noise levels cause 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, or an increase of 5 dBA in CNEL if the existing plus project noise levels fall within the "conditionally acceptable" or "normally acceptable" category at noise-sensitive uses. (Source: City of Los Angeles, L.A. CEQA Thresholds Guide, 2006, page I.2-3.)

Source: Based on traffic data provided by Gibson Transportation Consulting, 2026; thresholds from City of Los Angeles, L.A. CEQA Thresholds Guide, page I.2-3, 2006.

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

Less than Significant with Mitigation Incorporated.

Construction

On-Site Construction Vibration

Structural Damage

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

The FTA and California Department of Transportation (Caltrans) have published standard vibration velocities for construction equipment operations. Building damage can be cosmetic or structural. Ordinary buildings that are not particularly fragile would not experience any cosmetic damage (e.g., plaster cracks) at distances beyond 30 feet. This distance can vary substantially depending on the soil composition and the underground geological layer between the vibration source and the receiver.[127] In addition, not all buildings respond similarly to vibration generated by construction equipment. Receptors susceptible to building damage include all structures located adjacent to the Project Site. This evaluation conservatively uses the structural damage criteria proposed by the Thresholds Update of 0.25 in/sec PPV at historic structures, 0.3 in/sec PPV at older residential structures, and 0.5 in/sec PPV for new residential structures and modern industrial and commercial structures.[128]

[127] Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, page 116, 2018.
[128] City of Los Angeles, Construction Noise and Vibration Updates to Thresholds and Methodology, Attachment 2 – Thresholds, page 5, 2024.

Table 28: *Construction Vibration - Unmitigated* lists the reference vibration levels for construction equipment measured at the nearest vibration-sensitive receptors**.** The groundborne vibration generated by construction equipment spreads through the ground and diminishes in magnitude with increases in distance. Per the Project's contractor, the equipment that is expected to be used for Project construction that would generate the most vibration consists of loaded trucks and a track mounted loader, which generates similar vibration velocities as a small bulldozer based on the general size and similar track system. Furthermore, the haul trucks would be staged at locations that would provide ease of access/egress from the Project Site and onto the roadway network.

Table 28: Construction Vibration - Unmitigated

Receptor	PPV (in/sec) at Receptor				Threshold PPV (in/sec)	Exceeds Threshold?
	Vibratory/ Sonic Pile Driver	Caisson Drill	Loaded Trucks	Track Mounted Loader/ Small Bulldozer		
Reference Vibration Level at 25 feet	*0.734*	*0.089*	*0.076*	*0.003*		
1 – Residential (500 S Westmoreland Avenue)	0.12	0.01	0.02	<0.01	0.3[2]	No
2A – Residential (509 and 511 Westmoreland Avenue)	0.10	0.01	0.02	<0.01	0.5[1]	No
2B – Residential (519 and 523 Westmoreland Avenue)	0.10	0.01	0.02	<0.01	0.25[4]	No
2C – Residential (529 and 533 Westmoreland Avenue)	0.08	0.01	0.02	<0.01	0.3[2]	No
2D – Residential (3101, 3105, 3103, 3107, 3109, 3115, 3113, 3117, and 3111 6th Street)	0.06	0.01	0.01	<0.01	0.25[4]	No
3A – Residential (444 Westmoreland Avenue)	0.02	<0.01	0.01	<0.01	0.3[2]	No
3B – Residential (425, 429, 435, 443 Virgil Avenue, 3105 5th Street, and 434 Westmoreland)	0.03	<0.01	0.01	<0.01	0.5[1]	No
4 – Puritan Reformed University 3000 W 6th Street)	0.03	<0.01	0.01	<0.01	0.5[1]	No
5A – Residential (418 S Virgil Avenue)	0.01	<0.01	<0.01	<0.01	0.5[1]	No
5B – Residential (424 S Virgil Avenue and 3055 W 5th Street)	0.01	<0.01	<0.01	<0.01	0.3[2]	No
5C – Residential (436 S Virgil Avenue)	0.01	<0.01	0.01	<0.01	0.5[1]	No
6 – Residential 531 and 537 S Commonwealth Avenue	0.02	<0.01	0.01	<0.01	0.3[2]	No
7A – New Covenant Academy/ Doulos Mission Church (522 and 530 Shatto Place)	0.02	<0.01	0.01	<0.01	0.5[1]	No
7B – New Covenant Academy/ Doulos Mission Church (550 S Shatto Place)	0.02	<0.01	<0.01	<0.01	0.25[4]	No
8A – Residential (2968 W 6th Street)	0.02	<0.01	0.01	<0.01	0.5[1]	No
8B – Residential (620 S Virgil Avenue)	0.01	<0.01	<0.01	<0.01	0.25[4]	No
9 – World Mission University (500 S Shatto Place)	0.02	<0.01	0.01	<0.01	0.5[1]	No

Table 28: Construction Vibration - Unmitigated

Receptor	PPV (in/sec) at Receptor				Threshold PPV (in/sec)	Exceeds Threshold?
	Vibratory/ Sonic Pile Driver	Caisson Drill	Loaded Trucks	Track Mounted Loader/ Small Bulldozer		
10 – Residential (3163 W 5th Street, 456 S Shatto Place, 439, 433, and 423 S Westmoreland Avenue)	0.02	<0.01	0.01	<0.01	0.5[1]	No
11 – Residential (611 and 615 S Virgil Avenue)	0.01	<0.01	<0.01	<0.01	0.3[2]	No
12 – St John Grace University (617 and 612 S Virgil Avenue)	0.01	<0.01	<0.01	<0.01	0.5[1]	No
13 – Kidsbel (Educational Institution) (609 S Westmoreland Avenue)	0.01	<0.01	<0.01	<0.01	0.3[2]	No
14 – Dongguk University Los Angeles/ Ttokamsa Home Mission Church (434, 440, and S Shatto Place)	0.01	<0.01	<0.01	<0.01	0.5[1]	No
15 – Immaculate Heart of Mary Preschool (426 S Commonwealth Avenue)	0.01	<0.01	<0.01	<0.01	0.3[2]	No
16 – Pilgrim School/ New Central Church/ First Congregational Church of Los Angeles (540, 538, 532, 526, 520, 516, 510, 502 S Commonwealth Avenue)	0.01	<0.01	<0.01	<0.01	0.25[4]	No
17 – Medical Office (501, 503, 505, 509, and 511 S Virgil Avenue)	0.44	0.05	0.45	0.02	0.5[1]	No
18 – Commercial (535 and 539 S Virgil Avenue, 3005 and 3031 W 6th Street, 530, 534, and 538 S Westmoreland Avenue)	**6.24**	**0.76**	0.45	0.02	0.5[1]	**Yes**
19 – Medical Office (500, 510, 520, 524, 530, 534 S Virgil Avenue, and 2999 W 6th Street)	0.13	0.02	0.02	<0.01	0.5[1]	No
20 – Commercial (3030 W 6th Street, 606, and 610 S Westmoreland Avenue)	0.02	<0.01	0.01	<0.01	0.5[1]	No
21 – Medical Office (614 and 616 S Westmoreland Avenue)	0.01	<0.01	<0.01	<0.01	0.5[1]	No
22 – Commercial (615, 617, and 621 S Westmoreland Avenue)	0.01	<0.01	<0.01	<0.01	0.25[4]	No
23 – Medical Office (601 and 605 S Westmoreland Avenue)	0.02	<0.01	<0.01	<0.01	0.5[1]	No
24 – Medical Office (3130 W 6th Street)	0.01	<0.01	<0.01	<0.01	0.25[4]	No
25 – Commercial (514 S Shatto Place)	0.02	<0.01	0.01	<0.01	0.5[1]	No

1. Thresholds Update criteria for moder industrial/commercial buildings and newer residential structures.
2. Threshold Update criteria for older residential structures, which is defined as a structure over 50 years.
3. Thresholds Update criteria for historic buildings.

Source: Federal Transit Administration. *Transit Noise and Vibration Impact Assessment Manual.* 2018; City of Los Angeles. Construction Noise and Vibration Updates to Thresholds and Methodology. 2024.

As shown in **Table 28**, construction-related vibration would fall under the applicable thresholds for all of the vibration sensitive receptors except for Receptor 18, a commercial building located approximately 6 feet to the south of anticipated shoring activities using either a vibratory/sonic pile driver or caisson drill rig. **Table 29:** *Construction Vibration – Mitigated* lists the required buffer distances for shoring activities to remain below the City's threshold of 0.50 in/sec PPV at Receptor 18.

Table 29: Construction Vibration – Mitigated

Receptor	PPV (in/sec) at Receptor		Threshold PPV (in/sec)	Exceeds Threshold?
	Vibratory/ Sonic Pile Driver	Caisson Drill		
Reference Vibration Level at 25 feet	*0.734*	*0.089*		
Required Buffer Distance	***33***	***8***		
18 – Commercial (535 and 539 S Virgil Avenue, 3005 and 3031 W 6th Street, 530, 534, and 538 S Westmoreland Avenue)	0.48	0.49	0.5[1]	No
1. Thresholds Update criteria for moder industrial/commercial buildings and newer residential structures.				
Source: Federal Transit Administration. *Transit Noise and Vibration Impact Assessment Manual.* 2018; City of Los Angeles. Construction Noise and Vibration Updates to Thresholds and Methodology. 2024.				

As shown in **Table 29**, implementation of **Mitigation Measures NOI-1** through **NOI-2**, which are set forth below, would reduce vibration impacts to a less than significant level by requiring the designation of a construction relations officer to serve as a liaison with adjacent uses and prohibiting the on-site use of a vibratory/sonic pile driver within 33 feet and prohibiting the use of a caisson drill within 8 feet of the commercial building to the south. Therefore, the Project's on-site construction vibration impacts would be less than significant with mitigation incorporated.

Human Annoyance

The City has not established a quantitative human annoyance threshold during the permitted hours of construction, as construction activities that are undertaken during daytime hours are a typical part of living in an urban environment and construction vibration would not be anticipated to result in health impacts or to substantially affect the activities of the general public during daytime hours. Because Project construction will comply with the City's permitted hours of construction, vibration impacts for human annoyance would be less than significant, and no mitigation measures would be required.

Mitigation Measures: As analyzed above, vibration impacts associated with off-site sources during construction would have the potential to result in significant temporary impacts. However, implementation of the following mitigation measure would reduce construction-related vibration impacts to a less than significant level.

MM NOI-1: The developer shall designate a construction relations officer to serve as a liaison with the adjacent uses. The liaison shall be responsible for responding to concerns regarding vibration within 24 hours of receiving a complaint. The liaison shall respond to concerns by ensuring that steps are taken to reduce vibration levels, as deemed appropriate and safe by the on-site construction manager. Such steps could include substituting lower vibration generating equipment or activity or rescheduling of high vibration-generating activity.

MM NOI-2: Prior to construction, the Applicant shall retain a contractor to manage Project construction. The contractor shall ensure that the on-site operation of vibratory equipment adheres to the following restrictions to ensure that vibration velocities would not exceed 0.5 in/sec PPV.

- On-site operation of vibratory/sonic pile drivers are prohibited within 33 feet of any adjacent non-residential structure.
- On-site operation of caisson drill rigs are prohibited within 8 feet and of any adjacent non-residential structure.

Off-Site Construction Vibration

With regard to construction trucks, Project construction would involve truck travel along nearby roadways, generating vibration events with each passing truck. During excavation, soil would be stockpiled within designated areas of the Project Site prior to export. According to the FTA Manual, a truck rarely creates vibration levels that exceed 70 VdB (equivalent to 0.012 in/sec PPV) when on a roadway.[129] The factors influencing levels of groundborne vibration include vehicle speed, vehicle suspension, and wheel condition and type. The frequency of vibration events is not listed as an influencing factor for vibration velocity by the FTA.[130] As such, multiple trucks traveling along the roadway would increase the frequency of vibration events but wuld not affect the vibration velocity experienced by receptors. Therefore, because the trucks would generate vibration of approximately 0.012 in/sec PPV, which is well below the 0.25-0.5 in/sec PPV thresholds,[131] vibration impacts pursuant to the significance criteria for building damage from off-site construction activities would be less than significant, and no mitigation measures are required.

Operation

Vibrations generated by Project operations would primarily result from personal automobiles and small box trucks commonly used for household moving/storage purposes used by employees and customers and occasional loading and unloading within the Project's parking garage. Due to the rapid drop-off rate of groundborne vibration and the short duration of the associated events, vehicular traffic-induced groundborne vibration is rarely perceptible beyond the roadway right-of-way, and rarely results in vibration levels that cause damage to buildings in the vicinity.[132] Moreover, all such activities would take place within the covered and enclosed parking garage. According to the FTA's Transit Noise and Vibration Impact Assessment, trucks such as delivery trucks, refuse collection trucks, and occasional moving trucks rarely create vibration levels that exceed 70 VdB (equivalent to 0.012 in/sec PPV) when they are on roadways, which is well below the 0.25-0.5 in/sec PPV thresholds.[133]

Operation of the Project would also include the use of building mechanical equipment consisting of typical commercial-grade air condenser units mounted at the roof level with vibration-attenuation mounts to reduce vibration transmission. The Project would also include a ground level transformer on the

[129] Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, page 113, 2018.
[130] Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, page 111, 2018.
[131] City of Los Angeles, Construction Noise and Vibration Updates to Thresholds and Methodology, Attachment 2 – Thresholds, page 5, 2024.
[132] Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, page 112, 2018.
[133] City of Los Angeles, Construction Noise and Vibration Updates to Thresholds and Methodology, Attachment 2 – Thresholds, page 5, 2024.

northeastern corner of the Project Site. Commercial transformers generally do not exceed 0.10 in/sec PPV, which is well below the 0.25-0.5 in/sec PPV thresholds.[134,135] As such, vibration would not be perceptible at off-site sensitive receptors.

Therefore, vibration impacts associated with Project operations would be less than significant, and no mitigation measures are required.

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

No Impact. The Project Site is located approximately 2.5 miles northwest of the Los Angeles Times-Los Angeles Heliport, 9.5 miles northeast of Santa Monica Airport, 9.7 miles southeast of Hollywood-Burbank Airport, and 9.9 miles northeast of LAX. The Project Site is not located within the Planning Boundary/Influence Area or within an existing or projected noise contour associated with any private or public airport or airstrip. The Project would not expose people residing or working at the Project Site to excessive noise levels. Therefore, no impacts would occur, and no mitigation is required.

Cumulative Impacts

Cumulative Construction Noise

As discussed above, Project construction would not result in a substantial increase in ambient noise levels with the incorporation of mitigation. The Project could contribute to cumulative construction project noise impacts if the Project's construction activities and the Related Project's construction activities were conducted concurrently. Noise from the construction of projects is typically localized and has the potential to affect noise-sensitive uses only within 500 feet from the construction site, as construction noise would be attenuated by distance and intervening buildings, as typical in an urban setting.[136] Thus, the noise from construction activities for two projects located within 1,000 feet of each other could contribute to a cumulative noise impact for receptors located between the two construction sites.

The Related Project nearest to the Project Site is Related Project 1, which is located at 2965 West 6th Street, approximately 265 feet to the southeast of the Project Site. If construction of Related Project 1 were to overlap with construction of the Project, cumulative construction noise level increase could occur at sensitive uses surrounding the Project Site. Based on the distance of receptors to Related Project 1 and the Project Site, Related Project 1 is in close enough proximity that its individual or combined short-term construction noise levels could have a cumulative impact on the sensitive receptors analyzed herein. Related Project 1 is adjacent to Sensitive Receptor 6, the residential building located 250 feet to the east of the Project Site. As shown in **Table 21**, construction noise levels could reach up to 52.9 dBA L_{eq} at Sensitive Receptor 6. Assuming that construction activities from Related Project 1 and the proposed Project would overlap and the noise level from the proposed Project and Related Project 1 construction

[134] Dr. Michael Li, What is the vibration level of a dry type transformer?, 2025, https://www.sino-powers.com/blog/what-is-the-vibration-level-of-a-dry-type-transformer-350584.html. Accessed November 25, 2025.
[135] City of Los Angeles, Construction Noise and Vibration Updates to Thresholds and Methodology, page 5, 2024.
[136] City of Los Angeles, L.A. CEQA Thresholds Guide, page I-1-1, 2006, https://planning.lacity.gov/eir/CrossroadsHwd/deir/files/references/A07.pdf. Accessed December 2, 2025.

would be the same at each sensitive receptor, the combined noise levels could reach 55.9 dBA L_{eq} at Sensitive Receptor 6.[137] This combined noise level would not exceed the City's construction noise threshold of 80 dBA. All other Related Projects are located at greater distances from the Project Site. Thus, based on the relative location of the proposed Project to the Related Projects and noise attenuation provided by distance and intervening structures, construction noise from Related Projects is not anticipated to contribute substantial levels of construction noise at the receptors most impacted by the proposed Project. In light of the proposed Project's less than significant impacts, the Project's contribution to a potential cumulative construction noise impact would not be considerable.

In addition, construction activities at other planned and approved projects near the Project Site would be required to comply with applicable City rules related to noise and would take place during daytime hours on the days permitted by the applicable Municipal Code, and projects requiring discretionary City approvals would be required to evaluate construction noise impacts, comply with the City's standard conditions of approval, and implement mitigation, if necessary, to minimize noise impacts. Construction noise impacts are by nature localized. Based on the fact that noise dissipates as it travels away from its source, noise impacts would be limited to the Project Site and vicinity. Therefore, Project construction would not result in a cumulatively considerable contribution to significant cumulative impacts, assuming such a cumulative impact existed, and impacts in this regard are not cumulatively considerable.

Cumulative Operational Noise

Cumulative Off-Site Traffic Noise. Analyzing cumulative mobile noise is a two-step process. First, the combined effects from both a project and its related projects are assessed to determine if the combined noise level (i.e., the Combined Effect) exceeds the applicable threshold. Second, if a threshold is exceeded, the project's contributions to such increase (i.e., the Incremental Effects) are then analyzed. A project's contribution to a cumulative traffic noise increase would be considered significant when the Combined Effect exceeds the applicable perception level (i.e., auditory level increase) threshold. The Combined Effect compares the "Cumulative With Project" condition to "Existing" conditions. This comparison accounts for the traffic noise increase generated by the Project combined with the traffic noise increase generated by Related Projects. The Incremental Effects compare the "Future Without Project" condition to the "Cumulative With Project" condition. This comparison accounts for how much of the cumulative increase is specifically attributable to the project.

The following criteria are used to evaluate whether the cumulative with Project noise level would create a significant cumulative noise increase and whether the Project has a significant incremental contribution to the cumulative noise increase.

- Combined Effect. The cumulative with Project noise level ("Cumulative With Project") causes a 3.0 dBA increase over "Existing" conditions and the resulting noise level exceeds the applicable exterior standard at a sensitive use.
- Incremental Effects. The "Cumulative With Project" causes a 1.0 dBA increase in noise over the "Cumulative Without Project" noise level.

[137] When two identical sources are each producing sound of the same loudness, the resulting sound level at a given distance would be 3 dBA higher than one source under the same conditions. (FHWA, *Noise Fundamentals,* 2017).

- Thus, although there may be a significant noise increase due to the Project in combination with identified cumulative projects (the Combined Effect), the Project must also exceed the Incremental Effect threshold for its impact to be significant. In other words, a significant portion of the noise increase must be due to the Project.

A significant impact would result only if both the combined and incremental effects criteria have been exceeded and if noise levels exceed acceptable noise levels. Noise by definition is a localized phenomenon and reduces as distance from the source increases. Consequently, only the proposed Project and growth due to occur in the general area would contribute to cumulative noise impacts. Increases in local volumes from Related Projects within a half-mile radius of the Project Site have been estimated by the Traffic Assessment and included in cumulative traffic conditions. **Table 30:** *Cumulative Plus Project Buildout Conditions Traffic Noise Levels* identifies the traffic noise effects along roadway segments in the vicinity of the Project site for "Existing," "Cumulative Future Without Project," and "Cumulative Future Plus Project" conditions and net cumulative impacts.

Table 30: Cumulative Plus Project Buildout Conditions Traffic Noise Levels

Roadway Segment	CNEL @ 50 feet from Centerline[1]			Combined Effects	Incremental Effects	Cumulatively Significant Impact?
	Existing	Cumulative Future Without Project	Cumulative Future With Project	dBA Difference: Existing and Cumulative With Project	dBA Difference: Cumulative Without and With Project	
5th Street west of Westmoreland Avenue	56.1	56.3	56.4	0.3	0.1	No
5th Street between Westmoreland Avenue and Virgil Avenue	56.1	56.3	56.4	0.3	0.1	No
5th Street east of Virgil Avenue	56.5	57.3	57.4	0.9	0.1	No
6th Street west of Westmoreland Avenue	68.1	68.6	68.6	0.5	0.0	No
6th Street west of Westmoreland Avenue	68.1	68.5	68.5	0.4	0.0	No
6th Street between Westmoreland Avenue and Virgil Avenue	68.1	68.4	68.4	0.3	0.0	No
Westmoreland Avenue between north of 5th Street	59.0	59.6	59.6	0.6	0.0	No
Westmoreland Avenue between 5th Street and 6th Street	60.5	60.9	61.0	0.5	0.1	No
Westmoreland Avenue south of 6th Street	60.9	61.2	61.2	0.3	0.0	No
Virgil Avenue north of 5th Street	65.8	66.1	66.1	0.3	0.0	No
Virgil Avenue between 5th Street and 6th Street	65.8	66.2	66.2	0.4	0.0	No
Virgil Avenue south of 6th Street	66.7	66.9	66.9	0.2	0.0	No

dBA = A-weighted decibels; CNEL = day-night noise level
1. Traffic noise levels are at 50 feet from the roadway centerline.

Source: Based on traffic data provided by Gibson Transportation Consulting, 2026.

As shown in **Table 30** there is no Combined Effect that exceeds the 3.0 dBA threshold, nor any Incremental Effects attributable to the Project that exceeds the incremental 1.0 dBA threshold. As such, there are no cumulative noise level increases that exceed both the Combined Effect and Incremental Effects thresholds. Therefore, the Project's contribution to cumulative traffic noise would not be cumulatively considerable.

Cumulative Stationary Noise. Stationary noise sources of the Project would result in an incremental increase in non-transportation noise sources within the Project Site vicinity. However, as discussed above, operational noise caused by the Project would be less than significant. Similar to the Project, other planned and approved projects would be required to mitigate for stationary noise impacts at nearby sensitive receptors, if necessary. As stationary noise sources are generally localized, there is a limited potential for other projects to contribute to cumulative noise impacts.

No known past, present, or reasonably foreseeable future projects would combine with the operational noise levels generated by the Project to increase noise levels above acceptable standards because each project must comply with applicable City regulations that limit operational noise. Therefore, the Project, together with other projects, would not create a significant cumulative impact, and even if there were such a significant cumulative impact, the Project would not make a cumulatively considerable contribution to significant cumulative operational noises.

Given that noise dissipates as it travels away from its source, operational noise impacts from on-site activities and other stationary sources would be limited to the Project Site and vicinity. Thus, cumulative operational noise impacts from Related Projects, in conjunction with Project specific noise impacts, would not be cumulatively significant.

Cumulative Construction Groundborne Vibration. Due to rapid attenuation characteristics of groundborne vibration, only Related Projects located adjacent to the same sensitive receptors would result in cumulatively considerable vibration impacts. However, there are no structures adjacent to both the Project and any Related Projects that could be impacted by potential cumulative vibration from overlapping construction with respect to structural damage, sensitive medical equipment, or human annoyance. Therefore, construction of Related Projects would not contribute to the Project's construction vibration impacts and no cumulative impacts would occur.

As previously discussed, based on the FTA Manual, a truck rarely creates vibration levels that exceed 70 VdB (equivalent to 0.012 in/sec PPV) when on a roadway.[138] The vibration generated by a typical heavy truck would be approximately 63 VdB (0.00566 PPV) at a distance of 50 feet from the truck.[139] As Related Projects would be anticipated to use similar trucks as the Project, it is anticipated that construction trucks would generate similar vibration levels along the anticipated truck route(s). As discussed above, due to rapid attenuation characteristics of groundborne vibration, potential cumulative impacts associated with off-site truck travel would be less than significant with regards to structural damage. Therefore, construction of Related Projects would not contribute to the Project's construction vibration impacts and cumulative impacts would be less than significant.

[138] Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, page 113, 2018.
[139] Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, page 113, 2018.

Additionally, as noted above, there are no vibratory impacts for human annoyance when construction takes place during the City's permitted construction hours. Project construction will comply with the City's permitted construction hours, and the Related Projects would likewise be subject to the same restrictions or would need to seek City approval for any deviations. As such, cumulative impacts would be less than significant.

Cumulative Operational Groundborne Vibration. Due to the rapid attenuation characteristics of groundborne vibration and distance from each of the Related Projects to the Project Site, there is no potential for cumulative operational impacts with respect to groundborne vibration. Therefore, cumulative operational vibrations impacts would be less than significant.

4.14 POPULATION AND HOUSING

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

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

Less than Significant Impact.

Construction

Construction of the Project would result in increased employment opportunities in the construction industry. However, it is not likely that construction workers would relocate their households as a result of their temporary employment associated with construction of the Project. The construction industry differs from other employment sectors in that many construction workers are highly specialized and move from job site to job site as dictated by the demand for their skills, and they remain at a job site for only the timeframe in which their specific skills are needed to complete a particular phase of the construction process. Furthermore, it is likely that the construction workers employed for the construction of the Project would be taken from the labor pool currently residing in the Los Angeles metropolitan region that moves from project to project. Given the short duration of the work for each job and the large size and mobility of the construction labor pool that can be drawn upon in the region, construction workers would not be expected to relocate their residences within this region or move from other regions into this region in response to the short-term Project-related construction employment opportunities and, therefore, no new permanent residents would be generated during construction of the Project. As such, impacts would be less than significant, and no mitigation measures would be required.

Operation

Direct Growth

The Project does not propose the removal or the development of housing and would, therefore, not result in substantial or unplanned population growth as a result of the on-site generation or off-site replacement of housing. The Project would result in the construction of an approximately 252,873 square feet storage building. Growth forecasts prepared by SCAG contained in the 2024-2050 RTP/SCS indicate that employment within the City will increase from 5,031,000 jobs in 2019 to 5,461,000 in 2050, an increase

of 430,000 jobs.[140] The storage facility is expected to employ approximately two long term and two short term employees. Representing 0.001 percent of this increase, the Project would be within local and regional employment projections. It is not anticipated that the increase in employment at the Project Site would result in substantial population growth as it is reasonable to expect that some or all of the new employees would be drawn from the existing local labor force within the City. Moreover, the Project Site and City are well-served by existing transit options, which would be readily available for out-of-area employees to use to commute to and from their jobs at the Project Site. Because the Project's employees would be accounted for in local and regional planning forecasts and would not result in an increase in the demand for additional housing, and because the Project Site is located in a highly developed area with transit options, the Project would not result in substantial or unplanned direct population growth. As such, impacts would be less than significant, and no mitigation measures would be required.

Indirect Growth

The Project is located in a highly developed urbanized area and would not require the extension of roadways or other infrastructure (e.g., water facilities, sewer facilities, electricity transmission lines, natural gas lines, etc.) into undeveloped areas. As the Project would be supported by the existing urban infrastructure, the Project would not result in indirect unplanned population growth. As such, impacts would be less than significant, and no mitigation measures would be required.

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

No Impact. The Project Site is currently developed with a 56,072 sf vacant four-story office building and associated surface parking lot. The Project would not involve the demolition, removal, or change in use of any existing residential uses. As such, the Project would not displace existing people or housing and the construction of replacement housing elsewhere would not be required. Therefore, no impacts would occur, and no mitigation measures would be required.

Cumulative Impacts

The Project would not construct or displace residential units such that there would be no direct impacts to population and housing. While the Project would slightly increase on-site employment, these increases would not be expected to cause a substantial number of new households to move to the Wilshire community Plan area or to generate a demand for substantial new housing. Further, the Project Site is already developed with urban uses, and the Project would not extend infrastructure to currently unserved areas and would not induce substantial population growth. Thus, Project population and housing impacts would be less than significant. In addition, while the Related Projects could cumulatively increase population in the area, such increases would be expected to be within City and SCAG growth forecasts. The Project would contribute little if any to additional population and employment growth in the area.

[140] SCAG, 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) Demographics and Growth Forecast, https://www.scag.ca.gov/sites/default/files/2024-05/23-2987-tr-demographics-growth-forecast-final-040424.pdf. Accessed November 12, 2025.

Thus, the Project would not contribute considerably to cumulative population and housing impacts, and cumulative population and housing impacts would be less than significant.

4.15 PUBLIC SERVICES

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
PUBLIC SERVICES. Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i) Fire protection?	☐	☐	☒	☐
ii) Police protection?	☐	☐	☒	☐
iii) Schools?	☐	☐	☐	☒
iv) Parks?	☐	☐	☐	☒
v) Other public facilities?	☐	☐	☐	☒

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

i) Fire protection?

Less Than Significant Impact. Fire protection and emergency medical services for the Project and the Project Site would be provided by the Los Angeles Fire Department (LAFD). The LAFD's 3,510 uniformed fire personnel[141] protect life, property and the environment through their direct involvement in fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education and community service. An equally committed non-sworn cadre of 392 professional support personnel provide technical and administrative expertise in their corresponding pursuit of the department's mission.[142] A total of 1,018 uniformed firefighters are on duty at fire department facilities Citywide, including 106 neighborhood fire stations located across the Department's 468.74 square-mile jurisdiction.[143]

[141] Los Angeles Fire Department (LAFD), Our Mission, https://lafd.org/about/about-lafd/our-mission. Accessed December 18, 2025.
[142] LAFD, Our Mission.
[143] LAFD, Our Mission.

The LAFD has four fire stations located in proximity to the Project Site that would provide initial response to the Project Site: Fire Stations 6, 11, 13, and 29.[144] **Table 31:** *LAFD Fire Stations Located in the Vicinity of the Project Site*, provides information on the location, the approximate distance/direction from the Project Site, and the average response time.[145]

Table 31: LAFD Fire Stations Located in the Vicinity of the Project Site

Fire Station	Address	Approximate Distance/Direction from Project Site	Average Operational Response Time
Fire Station 6	326 North Virgil Avenue	0.8 miles north	7:40 (EMS) 6:20 (Non EMS) 6:09 (Critical ALS) 4:32 (Structural Fire)
Fire Station 11	1819 West 7th Street	0.97 miles southeast	6:41 (EMS) 6:03 (Non EMS) 5:24 (Critical ALS) 4:27 (Structural Fire)
Fire Station 13	2401 West Pico Boulevard	1.2 miles south	7:16 (EMS) 6:35 (Non EMS) 5:44 (Critical ALS) 4:34 (Structural Fire)
Fire Station 29	4029 West Wilshire Boulevard	1.6 miles southwest	7:32 (EMS) 6:25 (Non EMS) 6:07 (Critical ALS) 4:10 (Structural Fire)

Notes:
Structural Fire= The type of call reserved when the Los Angeles Police Department receives a report of a building or structure that is actively burning. EMS = Emergency Medical Services; ALS = Advanced Life Support
Sources:
[a] Data from January to August 2025. LAFD, Find Your Station, https://lafd.org/fire-stations/station-results. Accessed November 12, 2025.

Construction

The Project includes the demolition of an existing 56,072 sf vacant four-story office building and its associated parking lot and the construction of an approximately 252,873 sf eight-story self-storage facility and would not involve the construction or physical alteration of a fire station.

Like all construction projects, the Project's construction activities may temporarily increase the demand for fire protection and emergency medical services and may cause the occasional exposure of combustible materials, such as wood, plastics, sawdust, covering and coatings, to heat sources including machinery and equipment sparking, exposed electrical lines, welding activities, and chemical reactions in combustible materials and coatings. However, in compliance with the requirements of OSHA, all construction managers and personnel would be trained in fire prevention and emergency response. Furthermore, fire suppression equipment specific to construction would be maintained on the Project Site. As applicable, construction activities would be required to comply with the California Building Code

[144] LAFD, Find your Station, https://lafd.org/fire-stations/station-results. Accessed November 12, 2025.
[145] LAFD, FireStatLA, https://lafd.org/fsla/stations-map. Accessed November 12, 2025.

(CBC), the California Fire Code (CFD), and Article 7: Fire Protection and Prevention (Fire Code) of Chapter V: Public Safety and Protection, of the LAMC.

Construction activities are expected to be primarily contained within the Project Site boundaries. Throughout the construction period, the curb lanes on the Project Site frontages may be temporarily closed during major delivery of materials. The Project would implement **PDF-TRANS-1: Construction Management Plan,** set forth below, which would include temporary traffic control measures to direct traffic around any closures and to prevent emergency access from being impeded. The use of public ROW may require temporary rerouting of pedestrian and bicycle traffic. The Project's Construction Management Plan would include measures to ensure pedestrian and bicycle safety along the affected sidewalks, bicycle facilities, and temporary walkways. Project construction may also result in temporary elimination of several on-street parking spaces on Westmoreland Avenue and Virgil Avenue adjacent to the Project Site. However, **PDF-TRANS-1: Construction Management Plan**, set forth below, would require a worksite traffic control plan in accordance with applicable City guidelines, for any temporary closure of vehicle lanes or sidewalks and these plans would provide for safe and efficient movement for vehicular and pedestrian traffic.

Due to the limited duration of construction activities, the Project Site's proximity to four fire stations, implementation of a Construction Management Plan, and compliance with applicable codes, Project-related construction would not be expected to adversely impact firefighting and emergency services so as to necessitate a new or expanded fire station in order to maintain acceptable service ratios, response times, or other performance objectives of the LAFD. Moreover, consistent with *City of Hayward v. Trustees of California State University* (2015) 242 Cal.App.4th 833, significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area of a project, and potential impacts on public safety services are not an environmental impact that CEQA requires a project applicant to mitigate.

Therefore, construction impacts on fire protection and emergency medical services would be less than significant, and no mitigation measures are required.

Operation

Operational activities associated with the Project could potentially increase the demand for fire protection and emergency medical services. As discussed under Section 4.14, *Population and Housing*, the Project would not include any residential uses and would employ approximately two full-time and two part-time employees at the Project Site. The employees generated by the Project would be within local and regional employment projections.

The Project would also be required to comply with fire protection design standards, as necessary, per the California Building Code, California Fire Code, the LAMC, and the LAFD to ensure adequate fire protection. Key components of these regulatory requirements that would be implemented as part of the Project, subject to LAFD review and guidance, include the following:

- **Building Design:** Installation of fire resistant doors and materials, as well as walkways, stairwell, and elevator systems (including emergency and fire control elevators) that meet code requirements.

- **Fire Safety Features:** Installation of automatic sprinkler systems, smoke detectors and appropriate signage and internal exit routes, if not already installed, to facilitate a building evacuation if necessary; as well as installation of a fire alarm system, building emergency communication system, and smoke control system.
- **LAFD Access:** Access for LAFD apparatus and personnel to the Project Site in accordance with LAFD requirements, inclusive of standards regarding fire lane widths and weight capacities needed to support fire fighting vehicles, markings and on-site vehicle restrictions to ensure safe access.

The City requires that plans for building construction, fire flow requirements, fire protection devices (e.g., sprinklers and alarms), fire hydrants and spacing, and fire access including ingress/egress, turning radii, driveway width, and grading to be prepared for review and approval by the LAFD. The Project Site is surrounded by urban development and is not adjacent to any wildlands. Therefore, no fuel modification for fire fuel management would be required, nor would the Project be subject to wildfire risk.

Another important component of ensuring fire protection services is the availability of adequate firefighting water flow. Fire flow requirements are closely related to land use. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazards. The Project would incorporate a fire sprinkler suppression system to reduce or eliminate the demands on public hydrants, which system would be subject to LAFD review and approval during the design and permitting of the Project. Based on LAMC Section 94.2020.0, which adopts by reference NFPA 14-2013 including Section 7.10.1.1.5, the maximum allowable fire sprinkler demand for a fully or partially sprinklered building would be 1,250 gallons per minute (gpm). Existing infrastructure would provide adequate water flow and pressure to the Project. In addition, a Service Availability Report (SAR) was submitted to the LADWP which provided information regarding the range of flows and pressures that can be expected at the requested service location. The SAR results indicated that there is a 6-inch water main within Virgil Avenue that can provide 1,400 gallons per minute of flow with a maximum residual pressure of 32 psi (pounds per square inch). There is also an 8-inch water main within Westmoreland Avenue that can provide 2,500 gallons per minute of flow with 35 psi. Based on this information, the existing infrastructure can provide adequate water flow and pressure to the Project. The SAR was approved on March 10, 2026 by the LADWP.

The Project Site vicinity is well served by four nearby fire stations within close proximity to one another and the Project Site. These LAFD fire stations would provide fire protection and emergency medical services to the Project Site area and are dispatched based on availability and the nearest unit to a service call. The Project-related increase in traffic on surrounding roadways could potentially affect emergency response times in the area. However, multiple factors would serve to facilitate LAFD responses to emergency calls. Emergency responses are routinely facilitated, particularly for high priority calls, through use of sirens to clear a path of travel, by driving in lanes of opposing traffic, by the use of alternate routes, and by multiple station responses. The Project Site is located outside of hazardous/hillside areas. Because of the grid pattern of the local street system, each of the nearby fire stations has multiple routes available to respond to emergency calls at the Project Site.

With the Project's compliance with applicable regulatory requirements (i.e., building design, fire safety features, emergency safety provisions, LAFD access), the Project's ability to meet fire water supply needs,

its location close to several LAFD stations, and its incorporation of a Construction Management Plan, the Project is not expected to result in a substantial increase in demand for additional fire protection services that would exceed the capability of the LAFD to serve the Project such that the construction of either new or expanded fire facilities would be required. Furthermore, the LAFD would review the Project and make recommendations, including any potential modifications to building plans, to reduce the risk of and susceptibility to the spread of fires, as determined by LAFD. LAFD also continues to monitor population growth and land development throughout the City and to identify additional resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possible station expansions or new station construction that may become necessary to achieve the desired level of service. Through the City's regular budgeting efforts, LAFD's resource needs would be identified, and monies allocated according to the priorities at the time.

Based on the above, and with the Project's incorporation of project design feature **PDF-TRANS-1**, the Project would not create the need for the addition of a new fire facility, or the expansion, consolidation, or relocation of an existing facility, to maintain service, and the potential for a physical impact associated with the construction of fire facilities is considered less than significant, and no mitigation measures are required.

ii) Police protection?

Less than Significant Impact. Police protection for the Project and the Project Site would be provided by the Los Angeles Police Department (LAPD). The nearest LADP station to the Project Site is the Olympic Community Police Station, which is located at 1130 S. Vermont, approximately one mile southwest of the Project Site.[146]

Some of the communities in this area served by this station are Koreatown and Arlington Heights.[147] The Olympic Community Police Station is under the jurisdiction of the West Bureau, which is comprised of a 124 square mile territory with a population of approximately 840,000 residents.[148]

Construction

Since the daytime population generated at the Project Site during construction (i.e., construction workers) would be temporary in nature, construction of the Project would not generate a permanent population on the Project Site that would substantially increase the demand for police services. However, construction sites can be sources of nuisances and hazards and invite theft and vandalism. When not properly secured, construction sites can contribute to a temporary increased demand for police protection services. As such, the Project Applicant would implement **PDF-PS-1: Construction Fencing**, set forth below, to require the construction site to be fenced along the perimeter to minimize trespassing, vandalism, short-cut attractions, and attractive nuisances.

Additionally, construction activities are expected to be primarily contained within the Project Site boundaries. The Project would implement **PDF-TRANS-1: Construction Management Plan** to ensure that temporary traffic control measure would be provided to direct traffic around any closures and that

[146] Los Angeles Police Department (LAPD), Find Your Local Police Station, https://www.lapdonline.org/find-your-local-police-station/. Accessed December 18, 2025.
[147] LAPD, https://www.lapdonline.org/lapd-contact/west-bureau/olympic-community-police-station/. Accessed November 12, 2025.
[148] LAPD, https://www.lapdonline.org/lapd-contact/west-bureau/. Accessed November 12, 2025.

emergency access would not be impeded. The Construction Management Plan would include measures to ensure pedestrian and bicycle safety along the affected sidewalks, bicycle facilities, and temporary walkways.

Furthermore, given the visibility of the Project Site from adjacent roadways and surrounding properties, existing police presence in the City, maintained emergency access, the Construction Management Plan discussed in **PDF-TRANS-1**, and construction fencing discussed in **PDF-PS-1**, the Project's construction activities are not expected to increase demand on existing police services to an extent that a new police facility would be required. Therefore, Project construction would have a less than significant impact on police protection, and no mitigation measures would be required.

Operations

Operational activities associated with the Project could increase the demand for police protection. The Project would not include any residential uses and is expected to generate approximately two full-time and two part-time employees at the Project Site. As discussed above, the new employees generated by the Project would be within local and regional employment projections. It is not anticipated that the increase in employment at the Project Site would result in substantial population growth, necessitating a high demand for police services. There are no special police protection requirements needed by law enforcement because of the specific attributes of the Project that would generate the need for new or altered police facilities.

As required by the City, the Project would include standard security measures such as security cameras, burglar alarms, access control to the building, and bolt-cutter resistant cylinder locks. The Project would incorporate guidelines as identified in LAPD's "Design Out Crime Guidelines: Crime Prevention Through Environmental Design," such as well-illuminated public and semi-public spaces designed with minimal dead space to eliminate areas of concealment. In addition, the LAPD will require that the commanding officer of the Community Area be provided a diagram of the Project Site showing access routes and any additional information that might facilitate police response (see **PDF-PS-2** below). These preventative and proactive security measures would decrease the amount of service calls that LAPD would otherwise receive. In light of these features, it is anticipated that any increase in demand upon police protection services would be relatively low, and would not necessitate the construction of a new or expanded police station, the construction of which may cause significant environmental impacts. As such, operational impacts would be less than significant, and no mitigation measures would be required.

Project Design Features

PDF-PS-1: Construction Fencing. A construction fence shall be constructed around the Project Site to minimize trespassing, vandalism, short-cut attractions, and attractive nuisances.

PDF-PS-2: LAPD Review. Prior to issuance of a Certificate of Occupancy for the Project, the Applicant shall provide the Olympic Community Police Station with a diagram of each portion of the Project Site, including access routes and additional information to facilitate potential LAPD responses.

iii) Schools?

No Impact. A significant impact may occur if a proposed project includes substantial employment or population growth, which could generate demand for school facilities that exceeds the capacity of the school district(s) responsible for serving the Project Site. The Project would have less than significant impacts on schools because it would be subject California Government Code Section 65995, which allows the Los Angeles Unified School District (LAUSD) to collect impact fees from developers of new residential developments. The Project does not include any housing and would not employ a significant number of employees; therefore, it would not be expected to generate a significant number of school-aged children. Additionally, Project construction would not be expected to generate even a temporary increase in school-aged children in the area because construction workers are typically hired from a pool of local workers who do not relocate between each job.

Furthermore, pursuant to the California Government Code Section 65995/California Education Code Section 17620, mandatory payment of the school fees established by the LAUSD in accordance with existing rules and regulations regarding the calculation and payment of such fees would, by law, fully address any indirect impacts to schools as a result of the Project. Therefore, no impacts related to an increased demand for school facilities would occur under the Project, and no mitigation measures are required.

iv) Parks?

No Impact. A significant impact to parks may occur if implementation of a project includes a new or physically altered park or creates the need for a new or physically altered park, the construction of which could cause substantial adverse physical impacts.

The Project does not include any residential uses and thus is not required to provide private open space. There are numerous parks in proximity to the Project Site, including Lafayette Park, MacArthur Park, and Shatto Park. During Project construction, a small number of construction workers could visit nearby parks to eat lunch or for recreational activity after a workday. However, construction workers are temporary employees with high turnover associated with the various phases of construction, so such park use would be rare and short-term. As noted above, Project operation is expected to generate up to four employees. These employees could utilize nearby parks, although they may be more likely to utilize parks near where they live. However, any increase from the employees would be negligible and would not have a perceivable impact on the nearby parks. Therefore, no impacts related to an increased demand for park facilities would occur under the Project, and no mitigation measures are required.

v) Other public facilities?

No Impact. A significant impact may occur if a project generates a demand for other public facilities (such as libraries) that exceeds the capacity available. The Project Site would be served by the Felipe De Neve Branch Library, which is located at 2820 West 6th Street approximately 0.2-miles east of the Project Site.

The Project does not include any residential uses, and although it would generate a small number of jobs, any associated increase in demand for public facilities would be negligible. The Project is not expected to create a demand for library services as no new residential population would be generated, and most employees (including temporary construction workers) would likely visit libraries near their homes. As

such, the Project is not expected to create substantial capacity or service problems that would require provision of new or physically altered facilities in order to maintain an acceptable level of service for libraries. Therefore, no impacts related to an increased demand for other public facilities, such as libraries, would occur under the Project and no mitigation measures are required.

Cumulative Impacts

Fire Protection Services

The Related Projects could cumulatively generate, in conjunction with the Project, the need for additional fire protection and emergency medical services from the LAFD. Although there would be cumulative demand on LAFD services, cumulative impacts on fire protection and medical services would be reduced through regulatory compliance and site-specific design and safety requirements, similar to the Project. All Related Projects would be subject to review by the LAFD for compliance with Fire Code and Building Code regulations related to emergency response, emergency access, fire flow, and fire safety.

As with the Project, construction of each Related Project would have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings and coatings) to fire risks from machinery and equipment sparks, and from exposed electrical lines, chemical reactions in combustible materials and coatings, and lighted cigarettes. However, similar to the Project, construction managers and personnel would be trained in emergency response and fire safety operations, which include the monitoring and management of life safety systems and facilities, such as those set forth in the Safety and Health Regulations for Construction established by OSHA. Additionally, in accordance with the provisions established by OSHA for emergency response and fire safety operations, fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on-site. Construction of the Related Projects would also occur in compliance with all applicable federal, State, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials.

Operation of the Project, in combination with any Related Projects, could increase the demand for fire protection services in the Project Site area. Specifically, there could be increased demands for additional LAFD staffing, equipment, and facilities over time.

The protection of public safety is the first responsibility of local government, and local officials have an obligation to give priority to the provision of adequate public safety services which are typically financed through the City general funds. Through the City's regular budgeting efforts, LAFD's resource needs would be identified, and monies allocated according to the priorities at the time. The Project, as well as the Related Projects, would also generate revenues to the City's General Fund (in the form of development impacts fees, property taxes, sales tax revenue, etc.) that could be applied toward the provision of fire services, as deemed appropriate by the City. It is LAFD's responsibility to assign new staff and equipment and potentially build new or expanded facilities, as necessary, to maintain adequate levels of service. Accordingly, in conformance with the California Constitution Article XIII, Section 35(a)(2) and the *City of Hayward v. Board of Trustees of California State University* ruling, the City has and will continue to meet its legal constitutional obligations to provide adequate public safety services, including fire and emergency services.

Furthermore, project-by-project traffic mitigation, multiple fire station response, system wide upgrades to improve response times, and other requirements imposed by the LAFD are expected to help support adequate response times. Through the process of compliance, the ability of the LAFD to provide adequate facilities to accommodate future growth and maintain acceptable levels of service would be ensured. Due to the fact that there are four LAFD Stations within less than 2.0 miles of the Project Site, the Project would not make a cumulatively considerable contribution to any cumulative impact related to the construction of new fire facilities.

Police Protection Services

The Related Projects could cumulatively generate, in conjunction with the Project, the need for additional police protection services from the LAPD. It is expected that the Related Projects (particularly those of a larger nature) would be subject to review by the LAPD on a project-by-project basis to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services.

Should Project construction occur concurrently with Related Projects in proximity to the Project Site, specific coordination among these multiple construction sites would be required and implemented through the Project's Construction Traffic Management Plan pursuant to **PDF-TRANS-1: Construction Management Plan**, which would ensure that emergency access and traffic flow are maintained on adjacent rights-of-way. In addition, similar to the Project, each Related Project would implement similar design features during construction and would be subject to the City's routine construction permitting process, which includes a review by the LAPD to ensure that sufficient security measures are implemented during construction.

Many of the Related Projects would also be expected to provide on-site security, personnel, and/or design features for their residents and patrons per standard development practices for the given uses. Each Related Project would be subject to the City's routine construction permitting process, which includes a review by the LAPD to ensure that sufficient security measures are implemented.

Operation of the Project, in combination with any Related Projects, would increase the demand for police protection services in the Project Site area. Specifically, there would be an increased demand for additional LAPD staffing, equipment, and facilities over time.

However, the protection of public safety is the first responsibility to local government and local officials have an obligation to give priority to the provision of adequate public safety services, which are typically financed through the City's General Funds, which would be supported by the Project and the Related Projects through the payment of development impact fees, property taxes, and sales tax revenue. Accordingly, the need for additional police protection services as part of an unplanned police station at this time is not an environmental impact that the Project is required to mitigate. Through the process of compliance, the ability of the LAPD to provide adequate facilities to accommodate future growth and maintain acceptable levels of service would be ensured. Therefore, the Project would not make a cumulatively considerable contribution to any cumulative impact related to the construction of new police protection facilities.

Schools

Pursuant to Government Code Section 65995, the payment of developer fees under the provisions of SB 50 addresses the impacts of new development on school facilities serving that development. The Project does not include any housing and would not employ a significant number of employees; therefore, it would not be expected to generate a significant number of school-aged children. Furthermore, pursuant to the California Government Code Section 65995/California Education Code Section 17620, mandatory payment of the school fees established by the LAUSD in accordance with existing rules and regulations regarding the calculation and payment of such fees would, by law, fully address any indirect impacts to schools as a result of the Project. Accordingly, in compliance with SB 50, impacts on public schools from the Related Projects would remain less than significant with mandatory payment of school impact fees. Therefore, the Project would not make a cumulatively considerable contribution to any cumulative impact related to the construction of new school facilities.

Parks

A significant impact to parks may occur if implementation of a project includes a new or physically altered park or creates the need for a new or physically altered parks, the construction of which could cause substantial adverse physical impacts.

The Project does not include any residential uses. The Project would not provide private open space. Any associated increase in demand for off-site park services would be negligible, as most employees would likely visit parks near their homes and no substantial new demand for parks and recreational facilities would occur. Moreover, Related Projects requiring discretionary approvals would be subject to CEQA review by the City which would address, in part, parks and recreational facilities service demand. Furthermore, the Related Projects would be required to comply with the parks and recreation requirements of the Quimby Act and LAMC (e.g., provision of parkland and/or payment of in-lieu fees), as applicable. Thus, the Project would not contribute considerably to cumulative parks and recreation impacts, and cumulative parks and recreation impacts would be less than significant.

Other Governmental Services

With respect to libraries, the Project would not generate a direct residential population that could increase the demand for libraries. In addition, any indirect increase in the local residential population associated with the Project would be negligible, as discussed above. Each Related Project would generate revenues to the City's General Fund (in the form of development impact fees, property taxes, sales tax, business tax, transient occupancy tax, etc.) that could be applied toward the provision of enhanced library services, as deemed appropriate. Therefore, the Project would not contribute considerably to any cumulative impacts to libraries, and cumulative libraries impacts would be less than significant.

4.16 RECREATION

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

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

No Impact. As discussed in Section 4.15 above, the Project does not include any residential uses and thus is not required to provide private open space. The Project is expected to require up to two full time and two part time employees at the Project Site. There are numerous parks in proximity to the Project Site, including Lafayette Park, MacArthur Park, and Shatto Park. Any associated increase in demand for off-site park services would be negligible, as most employees would likely visit parks near their homes. During Project construction, a small number of construction workers could visit nearby parks to eat lunch or for recreational activity after a workday. However, construction workers are temporary employees with high turnover associated with the various phases of construction, so such park use would be rare and short-term. As a result, Project construction activities would not result in an increased use of recreational facilities such that substantial deterioration would occur. Therefore, the Project would not substantially increase the demand for off-site public parks and recreational facilities such that substantial physical deterioration of those facilities would occur or be accelerated. Therefore, no impact would occur, and no mitigation measures would be required.

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

No Impact. As also discussed above, the Project does not include any residential uses and therefore would not result in any direct substantial population growth that would increase use of existing recreational facilities. Moreover, any recreational impacts from the Project's few employees would be negligible and would not require the construction or expansion of any existing facilities. Therefore, the Project would not necessitate construction of new recreational facilities. No Project impacts would occur, and no mitigation measures are required.

Cumulative Impacts

The Project, while not expected to generate a significant number of new residents (if any), in combination with any Related Projects, could result in an increase in permanent residents residing in the Project area that would utilize nearby parks and recreational facilities. However, the applicants of Related residential projects would be subject to the City's parkland fees and minimum open space requirements, ensuring that any potential impacts to parks and recreational facilities would be less than significant. Therefore, the cumulative impact to parks from successive projects of the same type in the same place over time would not be significant.

4.17 TRANSPORTATION

ENVIRONMENTAL IMPACTS Issues		Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
TRANSPORTATION. Would the project:					
a)	Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☒	☐
b)	Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c)	Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d)	Result in inadequate emergency access?	☐	☐	☒	☐

This section assesses potential project impacts based on the *Transportation Assessment for the 525. S. Virgil Self-Storage Project, Los Angeles, California* (Transportation Assessment) prepared by Gibson Transportation Consulting, Inc., dated January 2026, provided in **Appendix J**. The Transportation Assessment was prepared in accordance with the latest version of City of Los Angeles Department of Transportation (LADOT)'s Transportation Assessment Guidelines (TAG) (August 2022). The base assumptions and technical methodologies (i.e., trip generation, study locations, analysis methodology) were identified as part of the study approach and were outlined in a Memorandum of Understanding (MOU) that was reviewed and approved by LADOT on October 1, 2025, which is provided in **Appendix J**.

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

Less Than Significant Impact. As discussed in the Transportation Assessment and below, the Project would not conflict with the relevant City plans, policies, and programs and does not include any features that would preclude the City from completing and complying with these guiding documents and policy objectives.

Specifically, as evaluated in Appendix C of the Transportation Assessment and as discussed below under Threshold b) and above in Section 4.8, the Project would be consistent with, and would not impede, the City's implementation of the Mobility Plan 2035, the Health and Wellness Element (Plan for a Healthy Los Angeles), the Wilshire Community Plan, the Vision Zero Action Plan / Vision Zero Corridor Plans, the Citywide Design Guidelines, Connect SoCal, and the SCAG RTP/SCS. Furthermore, the Project would comply with existing applicable City ordinances (e.g., the City's existing transportation demand management (TDM) Ordinance in LAMC Section 12.26.G) and other requirements pursuant to the LAMC. Pedestrians and bicyclists would be able to access the Project Site via existing sidewalks around the perimeter of the Project Site, and the Project will widen the adjacent sidewalk along Virgil Avenue through a three-foot dedication. Bicycle parking facilities would be provided on-site as part of the Project. The

Project's access locations would be designed in compliance with City standards and safety requirements to provide adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls, and would be subject to City review and approval.

Thus, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities. Therefore, Project impacts would be less than significant, and no mitigation measures would be required.

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

Less Than Significant Impact.

SB 743, made effective in January 2014, required the Governor's Office of Planning and Research to update the CEQA guidelines regarding the analysis of transportation impacts. Under SB 743, the focus of transportation analysis shifted from vehicular delay (level of service [LOS]) to VMT, in order to reduce GHG emissions, create multimodal networks, and promote mixed-use developments. CEQA Guidelines Section 15064.3 specifies that VMT that exceeds an applicable threshold of significance may indicate a significant impact.

The TAG sets forth the applicable thresholds of significance and defines the methodology of analyzing a project's transportation impacts in accordance with SB 743 and CEQA Guidelines Section 15064.3. Per the TAG, the following thresholds are used for identifying whether a project will have significant transportation impacts:

- ***Threshold T-1: Conflicting with Plans, Programs, Ordinances, or Policies***

Threshold T-1 considers whether a project would conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities. A project would be considered consistent with a policy if it is generally in conformance and does not obstruct the implementation of that policy or preclude future improvements. If a conflict is identified, mitigation measures would focus on improving access, comfort, and safety for all mobility types, especially pedestrians, bicyclists, and transit riders. Refer to Table 4: Project Consistency With the Mobility Plan 2035, Table 5: Project Consistency With the Plan For A Healthy Los Angeles, and Table 6: Project Consistency With the Wilshire Community Plan within the Transportation Assessment for a detailed discussion of the Project's consistency with applicable plans, ordinances and policies . As analyzed in the Transportation Assessment, the Project would be consistent with the Mobility Plan 2035, Plan For A Healthy Los Angeles, and the Wilshire Community Plan.

LAMC Section 12.21.A.16 (Bicycle Parking)

LAMC Section 12.21.A.16 details the bicycle parking requirements for new developments. The Project would provide 25 short-term and 25 long-term bicycle parking spaces to meet the LAMC requirements for on-site bicycle parking supply, and is thus consistent with the objectives and requirements of LAMC Section 12.21.A.16.

Vision Zero Action Plan / Vision Zero Corridor Plans

Vision Zero implements projects that are designed to increase safety on the most vulnerable City streets. The City has identified a number of streets as part of the High Injury Network (HIN) where improvement projects will be targeted. Within the Study Area, 6th Street, Vermont Avenue, Wilshire Boulevard, Commonwealth Avenue, and Virgil Avenue south of 6th Street are all identified as part of the HIN.[149] There are Safety Improvements Projects proposed on several of those streets, consisting of installation of signal and crossing improvements to improve safety. The Project would not preclude proposed or future Vision Zero safety projects by the City on any streets. Thus, the Project does not conflict with Vision Zero.

Citywide Design Guidelines

A detailed analysis of the Project's consistency with the guidelines of the *Citywide Design Guidelines* is discussed in above Section 4.1, *Aesthetics* and within the Transportation Assessment. The Project would provide access for all modes of travel, including pedestrians and cyclists. The Project would encourage pedestrian circulation at the street level, in part through the orientation of the proposed new building, incorporation of artistic murals, and through the Project's design features aimed at providing a pedestrian-oriented streetscape.

The Project's location is in a transit-rich area with numerous Metro transit and LADOT transit bus lines. The Project would also help connect Project employees and visitors to the surrounding neighborhood, thereby encouraging the pedestrian experience and convenient access to transit. Thus, the Project would align with the Pedestrian-First Design approach of *Citywide Design Guidelines*.

As described above, the Project would not conflict with any applicable plans, programs, ordinances, or policies, and thus the Project would not result in a significant impact under Threshold T-1.

- ***Threshold T-2.1: Causing Substantial Vehicle Miles Traveled***

As detailed in City of Los Angeles VMT Calculator Documentation, LADOT developed the VMT Calculator to estimate project-specific daily work VMT per employee for developments within City limits, which is based on Home-Based Work Attraction trips (trips to a workplace destination originating from a residential use). Visitor trips are not factored into the VMT per employee analysis or impact thresholds, as those trips are typically to and from local residences and businesses for a self-storage facility and are assumed to have a negligible or even positive effect on total VMT. However, those trips are factored into the calculation of total project trips for screening purposes when determining if a VMT analysis would be required.

The Project is located in the Central APC area and, therefore, has a daily work VMT per employee impact threshold of 7.6 (**Table 32**).

Table 32: LADOT VMT Impact Criteria (15% Below APC Average)

Area Planning Commission (APC)	Daily Household VMT Per Capita	Daily Work VMT Per Employee
Central*	6.0	7.6
East LA	7.2	12.7

[149] Transportation Assessment for the 525. S. Virgil Self-Storage Project, Los Angeles, California (Transportation Assessment) prepared by Gibson Transportation Consulting, Inc., dated January 2026, provided in **Appendix J**.

Harbor	9.2	12.3
North Valley	9.2	15.0
South LA	6.0	11.6
South Valley	9.4	11.6
West LA	7.4	11.1
*Project APC Source: LADOT TAG		

The VMT Calculator was used to evaluate Project VMT in comparison to the VMT impact criteria and was set up with the Project's land use program as the primary input. The VMT Calculator includes a Warehousing/Self-Storage land use that was utilized for the analysis.

Project VMT

The Project would utilize TDM strategies to reduce the number of single occupancy vehicle trips to the Project Site, including provision of bicycle parking. In order to provide a conservative analysis, however, the VMT evaluation did not take into consideration any TDM strategies and the associated VMT or trip reductions. The VMT analysis results based on the VMT Calculator are summarized in **Table 33**. The VMT Calculator estimates that the Project would generate 585 daily work VMT, resulting in an average work VMT per employee of 7.0. The Project's work VMT per employee would not exceed the Central APC significant VMT impact threshold of 7.6 and, therefore, the overall Project would not result in a significant VMT impact, and no mitigation measures would be required.

Table 33: VMT Analysis Summary

Project Information	
Land Use	**Size**
Industrial | Warehousing/Self-Storage	252.876 kef
VMT Screening Analysis [a]	
Net Daily Vehicle Trips	433
Net Daily VMT	2,769
Project VMT Analysis [b]	
Resident Population	0
Employee Population [c]	83
Project Area Planning Commission	Central
Travel Behavior Zone (TBZ) [d]	Urban
Maximum Allowable VMT Reduction [e]	75%
Daily Vehicle Trips	433
Total Daily VMT	2,769
Total Home-Based Production VMT	-
Household VMT per Capita	-
Impact Threshold	-
Significant Impact	**-**
Total Home-Based Work Attraction VMT	585
Work VMT per Employee [f]	7.0
Impact Threshold	7.6
Significant Impact	**NO**
Source: *Transportation Assessment for the 525. S. Virgil Self-Storage Project, Los Angeles, California* (Transportation Assessment) prepared by Gibson Transportation Consulting, Inc., dated January 2026. Notes:	

[a] As part of the VMT Screening Analysis of the Approved MOU, the VMT Calculator Version 1.5 (October 2024) (VMT Calculator) was used to estimate the net daily vehicle trips and net daily VMT for the Project prior to any VMT reductions associated with the implementation of TDM strategies as part of the Project. Based on the results, a detailed VMT analysis for the Project is required.
[b] For conservative purposes, the VMT evaluation does not take into consideration TDM strategies.
[c] The VMT Calculator estimated that the Project would have 83 employees based on its size and land use category. However, as discussed above, the Project only expects to have approximately four employees. Therefore, the analysis is highly conservative because the actual employee count is expected to be much lower than the VMT Calculator assumption.
[d] An "Urban" TBZ is characterized in City of Los Angeles VMT Calculator Documentation (LADOT and DCP, May 2020).
[e] The maximum allowable VMT reduction is based on the Project's designated TBZ as determined in *Transportation Demand Management Strategies in LA VMT Calculator* (LADOT, November 2019) and *Quantifying Greenhouse Gas Mitigation Measures* (California Air Pollution Control Officers Association, 2010).
[f] Work VMT per Employee is based on the "home-based work attraction" trip types.

- ***Threshold T-2.2: Substantially Inducing Additional Automobile Travel***

The intent of Threshold T-2.2 is to assess whether a transportation project would induce substantial VMT by increasing vehicular capacity on the roadway network, such as the addition of through traffic lanes on existing or new highways, including general purpose lanes, high-occupancy vehicle lanes, peak period lanes, auxiliary lanes, and lanes through grade-separated interchanges. The Project is not a transportation project that would induce automobile travel. Therefore, the Project would not result in a significant impact under Threshold T-2.2.

- ***Threshold T-3: Substantially Increasing Hazards Due to a Geometric Design Feature or Incompatible Use***

Threshold T-3 requires that a project undergo further evaluation if it proposes new driveways or new vehicle access points to the property from the public ROW or modifications along the public ROW (i.e., street dedications).

The Project includes the reconstruction of an existing driveway on Westmoreland Avenue and proposes the construction of a new driveway on Virgil Avenue to provide vehicular access to the Project site. All loading would be accommodated on-site and would not disrupt the through-traffic operations of the adjacent roadway. Pedestrian and bicycle access to the Project Site would be provided via entrances along both of the Project Site street frontages.

Driveway Design Features

The final design of the driveways would be subject to review and approval by the LADBS, Bureau of Engineering, and LADOT during site plan review to ensure code compliance and safe pedestrian and vehicular design. As analyzed in the Transportation Assessment, the Project's driveways would neither substantially increase vehicular conflicts with other vehicles, bicycles, and/or pedestrians along Virgil Avenue and Westmoreland Avenue, nor present any geometric design hazards related to traffic movement.

Virgil Avenue, along which one of the Project driveways is situated, provides four travel lanes, two in each direction, and street parking is available on both sides of the street. Westmoreland Avenue provides two travel lanes, one in each direction, and street parking is available on both sides of the street. Sidewalks are provided on all Project Site frontages adjacent to the Project Site. The Project would dedicate an additional three feet to the existing 12-foot-wide sidewalk on Virgil Avenue along the Project Site, resulting in a 15-foot-wide sidewalk. This would not result in changes to the travel lanes or otherwise affect the general geometric design of roads surrounding the Project Site, nor would it implement any

features that would obstruct sight distance or paths of vehicular, pedestrian, or bicycle travel. Pedestrian and bicycle access would be separated from vehicular access.

The driveway widths are proposed at approximately 30 feet and will intersect with the streets at a 90-degree angle, consistent with City design standards.[150] Left turns would be prohibited from the Virgil Avenue driveway; the Westmoreland Avenue driveway would provide full access. Neither Project driveway would cross existing bicycle facilities. No unusual or new obstacles are presented in the design that would reduce sight distance or be considered hazardous to vehicles, bicycles, or pedestrians. Thus, the design and location of the Project driveways are not anticipated to result in conflicts between vehicles and pedestrians or bicycles. The Project driveways would have the capacity to accommodate all peak hour Project trips and the parking garage gates will remain open during business hours. Therefore, no safety or queuing hazards are expected to occur related to operation of the driveways.

Pedestrian and Bicycle Activity

The Project may result in an increase in both pedestrian and bicycle activity on Virgil Avenue; however, the Project would improve adjacent pedestrian facilities with new landscaping elements and a wider sidewalk on Virgil Avenue. Furthermore, the signalized intersections along Virgil Avenue at 5th Street and 6th Street facilitate traffic flow and provide marked continental crosswalks, walk signal indicators, and countdown timers to increase the safety of pedestrian crossings.

Physical Terrain

The topography of the Project Site and surrounding streets is level, and all driveways are designed to intersect the sidewalk and street at right angles, with adequate building setback to allow pedestrians and bicyclists to observe vehicles within the driveways. In addition, all pedestrian/bicycle access points would be located separate from vehicle driveways to limit potential conflicts between vehicles and pedestrians or bicycles.

The Project's pedestrian enhancements include new landscaping elements along Virgil Avenue to help facilitate pedestrian and bicycle accessibility and improve visibility near vehicular access points. The Project's landscape improvements in the public ROW would be designed to not interfere with visibility.

Project Location

The Project Site does not have any frontage on a roadway segment that has been identified as part of the HIN. The Project, upon completion, would widen one sidewalk and would not have an effect on the other sidewalk, nor would it have any negative impact on Safe Routes to School (SRTS). Further, the City's SRTS program has not identified any infrastructure improvement projects within the vicinity of the Project Site, nor would the Project preclude any improvements within the public ROW.

[150] LADOT's Manual of Policies and Procedures, Section 321: Driveway, Access, Circulation Design Guidelines, 2023.

The Project would maintain the designated driveway and roadway width requirements as indicated in the Mobility Plan, and the Project would not preclude future roadway improvements proposed in the Mobility Plan.

Incompatible Uses

None of the Project design elements or land uses are considered incompatible with the surrounding uses. There are no unusual or new obstacles that would be considered hazardous to motorized vehicles, non-motorized vehicles, or pedestrians.

Therefore, based on the analysis above, the Project does not present any geometric design hazards that would significantly impact traffic movement, mobility, or pedestrian accessibility. Thus, the Project would not result in an impact under Threshold T-3, and no mitigation measures would be required.

Freeway Safety Analysis

Section 2.4.4 of the TAG outlines the methodology of assessing potential vehicle to vehicle impacts that may result in unsafe vehicle queues from freeway off-ramp facilities due to speed differentials between the mainline freeway lanes and the queued vehicles at the off-ramp. Freeway safety analysis is required for a development project when the project adds 25 or more peak hour trips to any freeway off-ramp.

The Project Site is located between 0.9 and 1.8 miles from three different freeways (I-10, I-110, and US 101) and there are well over a dozen off-ramps on those freeways that could serve inbound Project traffic. As noted in the Transportation Assessment, the Project would not add 25 or more peak hour trips to any freeway off-ramp, and thus no freeway off-ramp queuing analysis is required. Furthermore, the Project would not result in adverse safety conditions at any freeway off-ramps, and no corrective measures would be required.

Conclusion

As shown above, the Project is consistent with the TAG, the applicable threshold, and thus with CEQA Guidelines Section 15064.3(b). Thus, impacts are less than significant, and no mitigation measures would be required.

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

Less Than Significant Impact. As discussed above, the Project does not present any geometric design hazards related to traffic movement, mobility, or pedestrian accessibility, and no significant impact would occur. Pedestrians and bicyclists would be able to access the Project Site via existing sidewalks around the perimeter of the Project Site. Bicycle parking facilities would be provided on-site as part of the Project. The Project's access locations would be designed in compliance with City standards and safety requirements to provide adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls.

The Project Site does not have any frontage on a roadway segment that has been identified as part of the HIN. The Project's new driveways would be designed to comply with LADOT standards. Therefore, the

Project would not be expected to increase hazards or conflicts. Therefore, impacts would be less than significant, and no mitigation measures are required.

d) Result in inadequate emergency access?

Less Than Significant Impact.

Construction

Construction activity would likely add traffic to the local and regional transportation systems through the hauling of excavated materials and debris, the transport of construction equipment, the delivery of construction materials, and travel by construction workers to and from the Project Site.

Based on the proposed haul route plan, loaded trucks would exit from the Project Site, travel along Virgil Avenue, to Wilshire Bouelvard, then south to South Hoover Street, then to the 10 freeway. The proposed haul routes will be reviewed and approved by the City.

Access

Construction activities are expected to be primarily contained within the Project Site boundaries. Throughout the construction period, the curb lanes on the Project Site frontages may be temporarily closed during crane delivery and major delivery of materials, and construction fences are expected to encroach into the public ROW (e.g., sidewalks and roadways) adjacent to the Project Site. However, implementation of **PDF-TRANS-1: Construction Management Plan**, which is set forth below, would include a worksite traffic control plan in accordance with applicable City guidelines for any temporary closure of curb lanes or sidewalks, and these plans would provide for safe and efficient movement for vehicular and pedestrian traffic. Parking closure across the property frontage would likely be requested to allow for ongoing construction access and possible staging, but this would be temporary and would be subject to City review and approval.

Transit

No bus stop is located adjacent to the Project Site; as such, no transit rerouting is anticipated, and no transit relocation will occur as a result of the Project construction.

On-Street Parking

On-street parking is allowed on Virgil Avenue and Westmoreland Avenue. Project construction could result in temporary elimination of several on-street parking spaces on Westmoreland Avenue and Virgil Avenue adjacent to the Project Site; however, as noted above, this would be temporary and would be subject to City review and approval.

Project Design Feature

PDF TRANS-1: Construction Management Plan

A detailed Construction Traffic Management Plan, including street closure information, a detour plan, haul routes, and a staging plan, would be prepared and submitted to the City for review and approval prior to issuance of building permits. The Construction Traffic Management Plan would formalize how construction would be carried out and identify specific actions that would be required to reduce the

effects on the surrounding community. The Construction Traffic Management Plan will be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and will include, but not be limited to, the following elements, as appropriate:

- Advance, bilingual notification to adjacent property owners and occupants within a 200 foot radius of upcoming construction activities, including durations and daily hours of operation.
- Prohibition of construction worker or equipment parking on adjacent streets.
- Prohibition of haul truck staging on any streets adjacent to the Project, unless specifically approved as a condition of an approved haul route.
- Temporary pedestrian, bicycle, and vehicular traffic controls during all construction activities to ensure traffic safety on the public ROW.
- Scheduling of construction activities to reduce the effect on traffic flow on surrounding Arterial Streets.
- Containment of construction activity within the Project Site boundaries to the extent feasible.
- Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers as appropriate.
- Scheduling of construction-related deliveries, haul trips, etc., to occur outside the commuter peak hours to the extent feasible.
- Spacing of trucks so as to discourage a convoy effect.
- Identification of a construction manager and provision of a telephone number for any inquiries or complaints from residents regarding construction activities that shall be posted at the site readily visible to any interested party during site preparation, grading, and construction. The construction manager shall keep a log of any complaints or inquiries.
- As part of the LADOT and/or LADBS established process for reviewing Construction Traffic Management Plans, potential overlapping construction activities and proposed haul routes would be reviewed to minimize the effects of cumulative construction activities on any particular roadway.

With incorporation of **PDF TRANS-1**, construction of the Project would not result in any significant effects relating to emergency access, and no mitigation measures would be required.

Operation

Project operation would generate traffic in the Project vicinity and could increase traffic within the area. However, emergency access to the Project Site and surrounding area would continue to be provided on adjacent streets similar to existing conditions.

The Project Site is located along Westmoreland Avenue and South Virgil Avenue, which are not designated as Disaster Routes.[151] Disaster routes further from the Project Site include Beverly Boulevard and North Alvarado Street.[152]

These Primary Disaster Routes would not be subject to any lane closures as a result of the Project. In addition, the Project is required to meet LAMC code requirements for adequate emergency access and comply with LAFD access requirements. The Project would comply with LAFD requirements inclusive of standards regarding fire lane widths and weight capacities needed to support fire fighting vehicles, markings, and on-site vehicle restrictions to ensure safe access. LAFD approval of plot plans showing fire hydrants and access for the Project would be required prior to construction. LAFD approval of definitive plans and specifications, and any associated permits, would be required prior to commencement of any portion of the Project. Prior to the occupancy of the Project, LAPD would be provided with a diagram of the Project Site, including access routes and additional information to facilitate potential LAPD responses.

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

Therefore, operational-related impacts on emergency access would be less than significant, and no mitigation measures are required.

Cumulative Impacts

In addition to potential Project-specific impacts, the TAG requires that the Project be reviewed in combination with nearby Related Projects to determine if there may be a cumulatively significant impact resulting from inconsistency with a particular program, plan, policy, or ordinance. In accordance with the TAG, the cumulative analysis must include consideration of any Related Projects within 0.50 miles of the Project Site and any transportation system improvements in the vicinity. Similar to the Project, the Related Projects considered in this cumulative analysis would be separately reviewed, including a check for consistency with applicable policies prior to approval by the City. As detailed above, the Project would conform with the relevant programs, plans, and policies and thus would not significantly contribute to a cumulative impact with respect to conflicts with the identified programs, plans, policies, and ordinances.

As detailed in the TAG, for projects that do not demonstrate an impact by applying an efficiency-based impact threshold (i.e., household VMT per capita or work VMT per employee) in the project impact analysis, a less than significant impact conclusion is sufficient in demonstrating there is no cumulative VMT impact, as those projects are already shown to align with the long-term VMT and GHG goals of the SCAG RTP/SCS. The Project would not result in a significant VMT impact, as described above. Therefore, the Project is not anticipated to result in a cumulative VMT impact, and no further evaluation or mitigation measures are required. Furthermore, the Project Site would provide bicycle parking and is well-served by

[151] Los Angeles County Department of Public Works, Disaster Route Maps, City of Los Angeles Central Area, https://dpw.lacounty.gov/dsg/disasterroutes/map/Los%20Angeles%20Central%20Area.pdf. Accessed December 3, 2025.
[152] Los Angeles County Department of Public Works, Disaster Route Maps, City of Los Angeles Central Area.

various local bus and rail lines to encourage use of the regional transportation system, in line with the SCAG RTP/SCS goals. Thus, the Project would encourage a variety of transportation options and would be consistent with SCAG the RTP/SCS goal of maximizing mobility and accessibility in the region.

With regard to design hazards, the Project would not result in a significant impact. Each Related Project would be reviewed by the City to ensure compliance with the City's requirements relative to the provision of safe access for vehicles, pedestrian, and bicyclists, which would incorporate standards for adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls to protect pedestrians and enhance bicycle safety. Furthermore, since modifications to access and circulation plans are largely confined to a project site and the immediate surrounding area, a combination of impacts with other Related Projects that could potentially lead to cumulative impacts is not expected. Therefore, the Project's contribution to a cumulative impact associated with hazardous design conditions would not be considerable.

Also, with regards to emergency access, the Project would not result in a significant impact. The Project Site and the surrounding area are located in an established urban area with a surrounding roadway network that includes multiple routes in the area that are available for emergency vehicles and evacuation. Drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic.

As with the Project, the Related Projects would be reviewed by the LAFD and LADOT to ensure compliance with the City's requirements relative to the provision of emergency access. Furthermore, since modification to emergency access and circulation plans are largely confined to a project site and immediate surrounding area, a combination of impacts with other Related Projects that could potentially lead to a cumulative impact is not expected. Therefore, the Project's contribution to cumulative emergency access impacts would not be considerable. Based on the above, the Project's contribution to cumulative transportation impacts would not be cumulatively considerable, and cumulative impacts would be less than significant.

Each Related Project would be required to comply with City requirements regarding haul routes and would implement mitigation measures and/or include project characteristics, such as traffic controls and safety procedures, as part of a Construction Management Plan, to reduce potential traffic impacts during construction.

The Project includes a request for a Haul Route and proposes the cut and export of 5,600 cubic yards of soil (7,280 with a 30-percent swell factor applied). According to the data pulled from Navigate LA on August 18, 2026 and the LADBS Board of Building and Safety Commissioners Haul Route Status Table updated on August 7, 2026, there are no other properties with active or pending haul routes within 500 feet of the subject property. As there are no other approved or pending haul routes, the proposed project would not result in a cumulative impact.

In addition, the haul route approval will be subject to recommended conditions prepared by Los Angeles Department of Transportation (LADOT) and Bureau of Street Services (BSS) to be considered by the Board of Building and Safety Commissioners that will reduce the impacts of construction-related hauling activity, monitor the traffic effects of hauling, and reduce haul trips in response to congestion.

Additionally, any haul route applications filed during permitting of the proposed project would be subject to the review of LADOT and the Bureau of Street Services and conditions of approval issued by the Board of Building and Safety Commissioners.

Also, pursuant to California Vehicle Code Section 21806, emergency vehicles are generally able to avoid traffic congestion in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic.

Therefore, the Project would not make a cumulatively considerable contribution to a cumulative impact on emergency access, and the cumulative impact would be less than significant.

4.18 TRIBAL CULTURAL RESOURCES

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

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

i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

Less Than Significant Impact.

As part of the Archaeology Report prepared by Kimley-Horn (included in **Appendix C**), an SLF search request to NAHC was sent on September 4, 2025. The NAHC provided the results on September 10, 2025. The results noted that there are no SLFs on file with the NAHC within or adjacent to the Project area. In addition, information regarding tribal resources and consultation is provided in **Appendix L**, Tribal Report.

ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Less than Significant with Mitigation Incorporated.

As of July 1, 2015, California Assembly Bill 52 of 2014 (AB 52) was enacted and expands CEQA by defining a new resource category: Tribal cultural resources. AB 52 establishes that "a project with an effect that may cause a substantial adverse change in the significance of a Tribal cultural resource is a Project that may have a significant effect on the environment" (PRC Section 21084.2). AB 52 further states that the lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a Tribal cultural resource, when feasible (PRC Section 21084.3).

AB 52 also establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified or adopted. Under AB 52, lead agencies are required to "begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed Project." Native American tribes to be included in the process are those that have requested notice of Projects proposed within the jurisdiction of the lead agency. As specified in AB 52, a lead agency must provide notice inviting consultation to California Native American tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the Tribe has submitted a request in writing to be notified of proposed projects. The Tribe must respond within 30 days of the City's AB 52 notice.

On May 27, 2026, an informational letter was mailed to a total of eight (8) California Native American tribes known to have resources in the Project area and requesting any information regarding resources that may exist on or near the project site. One response was received from the Gabrieleno Band of Mission Indians – Kizh Nation. On May 28, 2026, the Department of City Planning received a written response from the Gabrieleno Band of Mission Indians – Kizh Nation regarding a formal request for consultation. After a few months of deliberation on scheduling a consultation date, on July 22, 2026, the representative from the Kizh Nation informed staff that consultation via email would be the most efficient method to conduct the Tribal consultation. Staff confirmed and agreed to conduct the consultation virtually via email. On August 3, 2026, the Kizh Nation provided documentation and maps regarding the archaeological and historic context of Wilshire and the surrounding areas and documentation which establishes Los Angeles as the tribe's ancestral territory, as well as their requested mitigation measures to ensure the protection of significant cultural resources. Based on the response letter from the Kizh Nation, the tribe concluded that the project area possesses a high sensitivity for Tribal Cultural Resources. Those mitigation measures have been incorporated as **MM TCR-1**, **MM TCR-1a**, and **MM TCR-1b**.

Compliance with the mitigation measures would ensure any found resources are treated in accordance with mitigation measures requested by the Kizh Nation tribes and federal, state, and local guidelines, including those set forth in PRC Section 21083.2. As such, the Project could potentially result in a significant impact on a Tribal cultural resource. Therefore, impacts would be less than significant with mitigation incorporated.

Mitigation Measures

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

a. The project applicant/lead agency 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 subject 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 early 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 TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, Tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe.

d. On-site Tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh from a designated point of contact for the project applicant/lead agency 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 Kizh to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs.

MM TCR-1a: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial)

a. Upon discovery of any TCRs, 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 TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs 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-1b: 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.

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

Cumulative Impacts

Many of the Related Projects identified would require redevelopment of properties in urban areas that are currently developed and have been previously disturbed, and the potential to encounter and cause a significant impact on Tribal cultural resources is thus diminished. Further, in association with each Related Project's respective CEQA review, future AB 52 consultations with Native American tribes would be required in order to identify Tribal cultural resources, as applicable. However, as discussed above, the Project's impacts on Tribal cultural resources would be less than significant with mitigation incorporated. Therefore, to the extent cumulative impacts on Tribal cultural resources from the Related Projects did occur, contribution from the Project would not be cumulatively considerable, and thus there would be no cumulative impact.

4.19 UTILITIES AND SERVICE SYSTEMS

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

The following impact analysis pertaining to utilities and service systems includes information contained in the *Wet Utilities Report, 525 South Virgil, Los Angeles, CA 90057*, prepared by Ware Malcomb, dated March 2026 and contained in **Appendix K**.

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?

Water

Less than Significant Impact.

The facilities that will serve the Project Site include a large distribution system operated by the LADWP as well as local infrastructure. As discussed under Threshold b), below, LADWP can provide the needed water from its existing system pursuant of the provisions in the City of Los Angeles Urban Water Management Plan (UWMP) 2020. Therefore, LADWP would not require added or expanded facilities to meet the demand from the Project.

Existing water lines near the Project Site are owned and maintained by LADWP. There is an existing 6-inch water main in Virgil Avenue and an 8-inch in Westmoreland Avenue. These are connected by a 24-inch water main in 6th Street.

Construction

Water for construction of the Project would be required for dust control, cleaning of equipment, excavation/export, removal, and re-compaction, etc. The estimated construction-period demand would be significantly less than the Project's estimated operational demand, which, as described below, could be accommodated by the existing infrastructure. It is therefore anticipated that the existing water infrastructure would similarly meet the limited and temporary water demand associated with construction of the Project.

The Project would likely require construction of new, on-site water distribution lines to serve the new building. Construction impacts associated with the installation of water distribution lines would primarily involve trenching to place the water distribution lines below surface and would be limited to on-site water distribution and minor off-site work associated with connections to the public main. Therefore, as part of the Project, a Construction Management Plan (see **PDF-TRANS-1** above) would be implemented to reduce any temporary pedestrian and traffic impacts during construction, including maintaining lanes of travel and ensuring safe pedestrian access and adequate emergency vehicle access. In addition, prior to ground disturbance, Project contractors would coordinate with LADWP to identify the locations and depth of all water lines. LADWP would be notified in advance of proposed ground disturbance activities to avoid water lines and disruption of water service.

Therefore, Project construction would not require the relocation or construction of new or expanded water facilities. Therefore, impacts would be less than significant, and no mitigation measures are required.

Operation

Water consumption estimates for the Project for the new development as shown on **Table 34:** *Estimated Water Demand For The Project,* are based on the Los Angeles Bureau of Sanitation sewerage generation factors. An additional 20 percent has been added to the sewerage generation factors to provide a conservative estimate for water consumption. As shown below, the expected water demand that would be generated by operation of the Project would be 9,103 gpd. However, the Project's water demand would likely be reduced by its incorporation of low flow plumbing fixtures and low irrigation landscaping.

Table 34: Estimated Water Demand For The Project

Land Use	Units	Generation Rate (gpd/unit)[1]	Total Wastewater Generation (gpd)	Average Daily Flow (cfs)
Proposed Uses				
Storage Building	252,873 SF	30 GPD / 1,000 SF	7,586	0.014
20% Contingency[2]			1,516	0.0030
Proposed			**9,103 GPD**	**0.017**

1. Based on City Sewage Generation Factors.
2. A 20% contingency is applied to produce a conservative estimation of water consumption to account for water usage and irrigation.

Section 57.507 of the LAMC sets the fire flow requirements for the Project. These guidelines, in addition to the requirements set by the City Fire Chief, will prescribe the fire flow requirements and hydrant spacing requirements for the Project. Based on fire flow standards set forth in Section 57.507 of the LAMC, the Project Site falls within the industrial commercial category, which requires 6,000-9,000 gpm from 4 to 6 adjacent hydrants flowing simultaneously. This translates to 1,000-1500 gpm flowing from each hydrant and a minimum residual pressure of 20 pounds per square inch (psi). All portions of the proposed building must be within 300 feet of a hydrant. There are four existing hydrants within the vicinity of the Project Site at the following locations:

- Northwest of the intersection of West 5th Street and Westmoreland Avenue, approximately 180 feet from the northwest corner of the Project Site;
- Northeast of the intersection of West 5th Street and Virgil Avenue, approximately 120 feet from the northeast corner of the Project Site;
- Southeast of the intersection of West 6th Street and Virgil Avenue, approximately 250 feet from the southeast corner of the Project Site; and
- Southwest of the intersection of West 6th Street and Westmoreland Avenue, approximately 310 feet from the southwest corner of the Project Site.

The Project would incorporate a fire sprinkler suppression system to reduce or eliminate the demands on public hydrants, which system would be subject to Fire Department review and approval during the design and permitting of the Project. The Fire Department may require the installation of two new public hydrants along the project frontage along Westmoreland Avenue and Virgil Avenue.

In addition, a Service Availability Report (SAR) was submitted to the LADWP which provided information regarding the range of flows and pressures that can be expected at the requested service location. The SAR results indicated that there is a 6-inch water main within Virgil Avenue that can provide 1,400 gallons per minute of flow with a maximum residual pressure of 32 psi (pounds per square inch). There is also an 8-inch water main within Westmoreland Avenue that can provide 2,500 gallons per minute of flow with 35 psi. Based on this information, the existing infrastructure can provide adequate water flow and pressure to the Project. The SAR was approved on March 10, 2026 by the LADWP.

The Project Applicant would be required to participate in the cost of any necessary new water main extensions and/or replacements, or new hydrants, if required. If a deficiency or service problem were discovered during the permitting process that would prevent the Project Site from receiving an adequate level of service, the Project Applicant would be required to fund the required upgrades to adequately serve the Project.

Therefore, there would be adequate capacity available to accommodate the required fire flows and domestic water demand generated by the Project, and thus the Project would not require the relocation or construction of new or expanded water facilities. Therefore, impacts would be less than significant, and no mitigation measures are required.

Wastewater

Less Than Significant Impact.

Existing sewer lines within the City maintained by the Los Angeles Sanitation District. There is an existing 8-inch vitrified clay pipe (VCP) main sewer line sewer in Virgil Avenue and an 8-inch VCP main in Westmoreland Avenue. The sewer lines in the area gravity flow from north to south.

The City has one of the largest sewer systems in the world, including approximately 6,439 miles of sewers.[153] The Los Angeles sewer system is comprised of three smaller systems: Hyperion Sanitary Sewer System, Terminal Island Water Reclamation Plant Sanitary Sewer System, and Regional Sanitary Sewer System.[154] The Project Site is located within the Hyperion Sewer System Service Area, which is operated and maintained by the LA Sanitation (LASAN)[155] The existing total design capacity of the Hyperion Sewer System Service Area is approximately 580 million gallons per day (MGD).[156]

Construction

Wastewater would be generated throughout construction of the Project as a result of construction workers on-site. However, construction workers would utilize portable restrooms, which would not contribute to wastewater flows to the City's wastewater system. Thus, wastewater generation resulting from Project construction activities is not anticipated to cause any increase in wastewater flows. Construction impacts associated with the installation of new wastewater infrastructure would primarily be confined to trenching for miscellaneous utility lines and connections to public infrastructure. Installation of wastewater infrastructure would be limited to on-site wastewater distribution, and minor off-site work associated with connections to the public main. Although no upgrades to the public main are anticipated, minor off-site work could be required in order to connect to the public main.

Therefore, as part of the Project, a Construction Management Plan (see **PDF-TRANS-1** above) would be implemented to reduce any temporary pedestrian and traffic impacts during construction, including maintaining lanes of travel and ensuring safe pedestrian access and adequate emergency vehicle access. Although encountering groundwater during construction is unlikely (as discussed in Section 4.7 above), should perched groundwater be encountered during construction, it would be directed to a dewatering system and discharged in accordance with all applicable rules and regulations under the City's grading permit conditions. Overall, when considering impacts resulting from the installation of any required wastewater infrastructure, all impacts are of a relatively short-term duration (i.e., months) and would cease to occur once the installation is complete. Therefore, the Project impact on wastewater associated with construction activities would be less than significant, and no mitigation would be required.

---

[153] City of Los Angeles Department of Public Works, LA Sanitation (LASAN), Recycled Water, https://sanitation.lacity.gov/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p?_adf.ctrl-state=tctg4ncm4_1&_afrLoop=685298676126395&_afrWindowMode=0&_afrWindowId=null#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D685298676126395%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dtctg4ncm4_5, Accessed November 26, 2025.

[154] LASAN, Sewer System Management Plan, Hyperion Sanitary Sewer System, January 25, 2019, https://www.lacitysan.org/cs/groups/public/documents/document/y250/mdm1/~edisp/cnt035427.pdf. Accessed November 26, 2025.

[155] LASAN, Recycled Water.

[156] LASAN, Water Reclamation Plants, https://sanitation.lacity.gov/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p?_adf.ctrl-state=10286fki0e_5&_afrLoop=15527226951018202#!. Accessed November 26, 2025.

Operation

The estimated sewer flows for the new development on the Project Site were based on the sewer generation rates per the Los Angeles Bureau of Sanitation sewerage generation factors. The Project is estimated to generate a peak flow of approximately 7,586 gpd. This estimated flow is approximated using the Generation Factors and confirmation of capacity has been provided by the Sanitation District via the Sewer Capacity Availability Request (SCAR) approved by the City of Los Angeles Bureau of Engineering on December 24, 2025.

SCARs were obtained from the Los Angeles Bureau of Engineering for both the 8-inch sewer line on Virgil Avenue and the 8-inch sewer line on Westmoreland Avenue. The purpose of a SCAR is for the City of Los Angeles to evaluate the existing public sewer systems to determine if adequate capacity is available to safely convey sewage from proposed development projects. The SCARs approved 100 percent of the Project's anticipated sewer flow, which is estimated to be 7,586 gpd, into either sewer pipe.

Table 35: *Estimated Wastewater For The Project*, displays the Project's wastewater demands.

Table 35: Estimated Wastewater For The Project

Land Use	Units	Generation Rate (gpd/unit)[1]	Total Wastewater Generation (gpd)	Average Daily Flow (cfs)
Proposed Uses				
Storage Building	252,873 SF	30 GPD / 1,000 SF	7,586	0.014
1. Based on City Sewage Generation Factors.				

As further discussed above, the existing design capacity of the Hyperion Service Area is approximately 550 million gallons per day (consisting of 450 MGD at the Hyperion Treatment Plant, 80 MGD at the Donald C. Tillman Water Reclamation Plant, and 20 MGD at the Los Angeles–Glendale Water Reclamation Plant).[157] The Project's proposed wastewater generation is approximately 0.007 MGD.[158] Currently, up to 300 MGD is treated at the Hyperion Treatment Plant, resulting in an available treatment capacity of 150 MGD, which means the Project would account for approximately 0.0001 percent of the available capacity of the Hyperion Treatment Plant.[159] Consequently, impacts on wastewater treatment capacity would be less than significant, and no mitigation measures would be required.

Stormwater

Less Than Significant Impact.

Stormwater currently drains to the south via sheet flow on both Virgil Avenue and Westmoreland Avenue. Virgil Avenue has catch basins that connect to an underground storm drainpipe 12-inches in diameter. All stormwater along Virgil Avenue and Westmoreland Avenue flows in the gutter to a catch basin in Virgil Avenue. The line connects to a 12-inch diameter drainpipe along 6th Street where gravity flows from west to east.

[157] LASAN, Sewer System Management Plan Hyperion Sanitary Sewer System, January 25, 2019, https://www.lacitysan.org/cs/groups/public/documents/document/y250/mdm1/~edisp/cnt035427.pdf. Accessed December 2, 2025.
[158] 7,586 gpd translates to 0.006 millions of gallons per day (MGD).
[159] LASAN, Sewer System Management Plan Hyperion Sanitary Sewer System, January 25, 2019.

During construction, the Project would be required to implement BMPs, as required in the Project's SWPPP, following the latest guidelines of CASQA handbook as part of the City's grading permit requirements. BMPs would include, but would not necessarily be limited to, erosion control, sediment control, non-stormwater management, and materials management BMPs (e.g., sandbags, storm drain inlets protection, stabilized construction entrance/exit, wind erosion control, and stockpile management) to minimize the discharge of pollutants in stormwater runoff during construction. In addition, Project construction activities would occur in accordance with City grading permit regulations (LAMC Chapter IX, Article 1, Division 70), such as the preparation of an Erosion Control Plan, to reduce the effects of sediment and erosion.

During operation, the Project would comply with the City's LID guidelines. As noted in the Hydrology Report, infiltration is not feasible for the Project Site. Since infiltration is not feasible, biofiltration would be used on the Project Site. Ground floor LID trays will be utilized to treat the required amount of stormwater, which will drain into an underground detention system. This LID treatment system is designed to capture and treat storm events up to the 85th percentile. Stormwater runoff generated from storm events greater than the 85th percentile event will be conveyed via parkway drain(s) or curb drain(s) per City guidelines.

Drainage structures and improvements within the City are subject to review and approval by the City's Department of Public Works and LADBS. As required by the Department of Public Works, all public storm facilities must be designed in conformity with the standards set forth by Los Angeles County. The Department of Public Works reviews and approves Municipal Separate Storm Sewer Systems plans prior to construction. Any proposed increases in discharge directly into County facilities, or proposed improvements of County-owned Municipal Separate Storm Sewer System facilities, such as catch basins and drainage lines, require approval from County Flood Control to ensure compliance.

Therefore, the Project would not require the relocation or construction of new or expanded stormwater facilities. As such, impacts to stormwater would be less than significant, and no mitigation measures are required.

Electricity

Less Than Significant Impact.

Construction

Electrical power would be consumed to construct the new buildings and facilities of the Project. Typical uses include temporary power for lighting, equipment, construction trailers, etc. The demand is typically supplied from existing electrical services within the Project Site and would not affect other services. Overall, demolition and construction activities would consume less electricity than the existing storage building when operating. Additionally, as discussed above in Section 4.6, *Energy*, Project construction electrical uses would not result in wasteful or inefficient consumption, nor would it conflict with any applicable plans. Therefore, impacts on electricity supply associated with short-term construction activities would be less than significant, and no mitigation measures would be required.

Operation

Once the Project is operational, it would create electricity demand. As discussed above in Section 4.6, *Energy*, the Project's annual operational electrical demand would total approximately 1.62 GWh, which would account for less than 0.01 percent of the County's annual use. Project implementation would result in a negligible energy demand increase compared to the existing County demand. Additionally, the LADWP would review the Project's estimated electricity consumption to ensure that the estimated power requirements would be accounted for in the total load growth forecast for their service area and planned growth of the power system. As such, it is anticipated that the existing and planned electricity capacity and supply would be sufficient to serve the Project's electricity demand. It is also noted that Project design and operations would be subject to compliance with the latest CALGreen Code and Energy Code, as applicable, which would help further reduce electricity usage. Therefore, the Project would not necessitate the construction of off-site electrical facilities or infrastructure improvements that would have the potential to cause a significant environmental impact. As such, impacts would be less than significant, and no mitigation measures would be required.

Natural Gas

Less Than Significant Impact.

Construction

No natural gas usage is expected to occur during construction. Therefore, impacts on natural gas supply associated with short-term construction activities would be less than significant, and no mitigation measures would be required.

Operation

As discussed above in Section 4.6, *Energy*, the Project would consume 0.0040 million therms of natural gas, which would account for less than 0.01 percent of the County's annual use. According to the United States Energy Information Administration, the United States currently has over 86 years of natural gas reserves based on the 2021 supply and consumption rate.[160] As such, it is anticipated that the existing natural gas supply would be sufficient to serve the Project's modest natural gas demand. Further, as discussed above, the Project would be required to comply with energy conservation standards contained in Title 24 of the California Code of Regulations. The Project would also be required to comply with the L.A. Green Building Code, which incorporates by reference the CALGreen Code. The L.A. Green Building Code, effective January 1, 2020, requires the use of numerous energy conservation measures beyond those required by Title 24 of the California Code of Regulations. Estimated energy consumption does not take into account reductions provided by adherence to the L.A. Green Building Code, and thus the Project's actual natural gas consumption is expected to be lower than estimated. As such, operation of the Project would have a less than significant impact on natural gas systems, and no mitigation measures would be required.

[160] U.S. Energy Information Administration, Frequently Asked Questions, How Much Natural Gas Does the United States Have, and How Long Will It Last?. 2024, https://www.eia.gov/tools/faqs/faq.php?id=58&t=8. Accessed October 22, 2025.

Telecommunications

Less Than Significant Impact. Any new telecommunication connections would be constructed by a private utility service provider who would be required to follow all appropriate regulatory requirements for such connections. New service point connections to provide telecommunications services to the new buildings would be provided in conformance with all applicable federal, state, and county requirements. The Project would not result in the relocation or expansion of an existing telecommunication facilities. Therefore, impacts on telecommunication systems would be less than significant, and no mitigation measures are required.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less Than Significant Impact. As stated above, using the City's generation rates, the Project is expected to generate a water demand of 9,103 gpd. The Project would be designed to meet CALGreen and Title 24 Building Standards Code. Compliance with water conservation measures required by State and City green regulations would reduce this estimated projected water demand.

According to the reliability data in the LADWP 2020 UWMP, LADWP has sufficient supply to meet a total water demand of 746,000 in acre feet (af), by the year 2045. LADWP has programs to reduce the demand to 565,800 afy by 2045, a difference of 180,200 afy. As noted in the LADWP UWMP, the City's water usage today is lower than it was in the 1970s despite an increase in population of over one million people, which reflects the success and importance of the City's conservation strategies that include water conservation regulations, ordinances, and behavior changes resulting from customer outreach and educational programs.

In the 2020 Regional UWMP, the projected 2045 water demand for a Single Dry Year is 1,551,000 acre-feet per year (afy), and the capability of current supplies is 2,479,500 afy, meaning there is a potential surplus of 928,500 afy. For multiple dry weather years (FY 1988-1992 Hydrology scenario), the capability of current water supplies would be 2,239,000 afy; a potential surplus of 648,000 afy.

The UWMP is based on SCAG growth projections and takes into account all expected regional growth. As discussed above in Section 4.14, *Population and Housing*, the Project's modest employment contributions to growth fall within the range of growth accounted for in the SCAG projections that are used for future planning activities and provision of services. The projections are revised at 4-year intervals to stay current with current growth trends and changes in land use activity. Changes to planning and zoning designations can be incorporated in a timely fashion so long as the resulting growth does not exceed the growth projections. The UWMP is updated at regular five-year cycles and includes programs to meet the supply requirements. The Project's increase in water demand would fall within the available and projected water supplies reported in the 2020 UWMP for the City for 2045 and would constitute less than 0.01 percent of the City's projected 2045 water supply.

As there would be sufficient water supplies available to serve the Project, the impact regarding water supply would be less than significant, and no mitigation measures are required.

c) Result in a determination by the waste water 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 noted above in Threshold a), the Project will generate approximately 7,586 gpd of wastewater. Given the current capacity of the Hyperion Service Area, the Hyperion Service Area would have ample capacity to serve the Project's wastewater generation, and, as concluded in the SCAR, the BOS would have adequate capacity to serve the Project. Thus, the Project would have a less than significant impact with respect to wastewater treatment capacity, and no mitigation measures are required.

d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. Solid waste management in the City involves both public and private refuse collection services, as well as public and private operation of solid waste transfer, resource recovery, and disposal facilities. The BOS is responsible for developing strategies to manage solid waste generation and disposal in the City. The BOS collects solid waste generated primarily by single-family dwellings, small multifamily dwellings, and public facilities. Private hauling companies collect solid waste generated primarily from large multifamily residential, commercial, and industrial properties. The City does not own or operate any landfill facilities and the majority of its solid waste is disposed of at County landfills.

The County continually evaluates landfill disposal needs and capacity as part of the preparation of the Countywide Integrated Waste Management Plan (CoIWMP) Annual Report. Within each annual report, future landfill disposal needs over the next 15-year planning horizon are addressed in part by determining the available landfill capacity. The most recent annual report, the CoIWMP 2021 Annual Report, published in December 2022, provides disposal analysis and facility capacities for 2021, as well as projections to the CoIWMP's horizon year of 2036.[161] As stated within the CoIWMP 2021 Annual Report, the County is not anticipating a solid waste disposal capacity shortfall within the next 15 years under current conditions.[162] A variety of strategies, including mandatory commercial recycling, diversion of organic waste, and alternative technologies (e.g., engineered municipal solid waste conversion facilities or anaerobic digestion) would be implemented to ensure that the County would be able to accommodate the solid waste generated through the horizon year of 2036.[163]

In 2021, the total amount of solid waste disposed of at in-county Class III landfills, transformation facilities, and out-of-County landfills was approximately 11.1 million tons (including an import amount of 179,872) tons.[164] The remaining disposal capacity for the County's Class III (nonhazardous solid waste) landfills is estimated at approximately 137 million tons as of December 2021, the most recent data available.[165] Additionally, following the Eaton and Palisades fires, the County identified several recycling facilities and recycling facilities that would be permitted to receive fire debris.[166] Sunshine Canyon Landfill would be

[161] County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan 2021 Annual Report, 2022. https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=17450&hp=yes&type=PDF. Accessed November 14, 2025.
[162] County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan 2021 Annual Report, 2022.
[163] County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan 2021 Annual Report, 2022.
[164] County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan 2021 Annual Report, 2022.
[165] County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan 2021 Annual Report, 2022.
[166] County of Los Angeles Department of Public Works, Board Motion of January 28, 2025, https://file.lacounty.gov/SDSInter/bos/bc/1178215_BoardMotion1.28.25Item13-

allowed to increase from 12,100 to 15,000 tons per day for 120 days, with a possible extension if necessary. The Lancaster Landfill would also be allowed to increase from 3,000 to 7,000 tons per day for 120 days, with a possible extension if necessary. While the temporary increase in debris handling would reduce the short-term availability at these two landfills, the County landfills still have an estimated capacity of approximately 137 million tons.

Project construction would result in generation of construction and demolition (C&D) debris such as metal scrap, lumber, and concrete, which will be collected and diverted to a C&D debris facility for materials to be recycled and/or discarded. As shown in **Table 36: Estimated Project Waste Generation,** C&D debris for the Project is estimated to be approximately 3,087 tons. This estimation is a conservative estimate as it assumes no reductions in waste generation would occur due to recycling and it does not take in account offsets due to removal of the existing use.

Table 36: Estimated Project Waste Generation

Land Use	Size	Waste Generation Rate	Waste Generated (lbs or lbs/day)	Waste Generated (tons or tpd)
Demolition[1]				
Office Building	56.072 ksf	46 tons/ksf	5,158,624	2,579
Construction[2]				
Storage Facility	252.873 ksf	4,020 lb/ksf	1,016,549	508
Total C&D Waste			6,175,173	3,087
Operations[3]				
Storage Facility	252.873 ksf	5 lb/ksf/day	1,264	0.63
Total Operational Waste			1,264	0.63

ksf = 1,000 square feet; lbs = pounds; tpd = tons per day

1 The demolition waste generation rate of 46 tons/ksf is based on the CalEEMod User Guide Appendix A, page 13.

2 The construction waste generation rate of 4,020 lb/ksf is based on the USEPA, Characterization of Building-Related Construction and Demolition Debris in the United States, Table A-2, June 1998.

3 Generation factors provided by the CalRecycle website, refer to Estimated Solid Waste Generation Rates, https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates. Accessed December 4, 2025.

Although conservatively not accounted for in **Table 36**, it is anticipated that a large amount of construction debris would be recycled. Residual wastes such as trash packing materials and plastics could require disposal at landfill. Disposal and recycling of the construction debris would be required to comply with all federal, State, and local regulations.

As detailed in **Table 36**, based on solid waste generation factors from the California Department of Resources and Recycling and Recovery (CalRecycle), the Project could generate 0.63 tpd, without accounting for the reduction from existing operational uses. The annual amount of solid waste generated by the Project would represent a minor amount of the estimated 137.09 million tons of remaining disposal capacity for the County's Class III landfills. As such, the solid waste generated by the Project could be accommodated by the County's available regional landfills.

CLosAngelesCountyRecoveryEffortsandBuildingUrgencyintoImplementationofLong-TermDisasterSupport_2025.02.18_.pdf. Accessed June 10, 2025.

CalRecycle is the California State Agency that promotes the importance of reducing waste and oversees California's waste management and recycling efforts. Pursuant to PRC Section 41780, CalRecycle has issued jurisdiction waste diversion rate targets equivalent to 50 percent of the waste stream from the landfill.[167] Thus, it is important to note that the estimate of solid waste generated by the Project is conservative, in that the amount of solid waste that would need to be landfilled would likely be less than this forecast based on the City's implementation of solid waste diversion targets.

The Project's waste generation could be accommodated by the County's available regional landfills. According to the ColWMP 2021, the estimated remaining capacity as of December 2021 is 137.09 million tons. Waste from the City of Los Angeles is disposed of primarily at the Sunshine Canyon and Chiquita landfill sites. As of 2021, the Sunshine Canyon landfill had a remaining life of 16 years and the Chiquita Canyon had a remaining life of 26 years.[168] The waste generated by the Project would be subject to State and local recycling and waste diversion strategies and policies including the City's Solid Waste Integrated Resources Plan (SWIRP) goal of achieving a 90 percent solid waste diversion rate by 2025. Project construction would include the demolition of building and parking lot materials, which materials would be conveyed pursuant to the City's Waste Hauler Permit Program (Ordinance 181519), effective January 1, 2011. Under this Ordinance, all private waste haulers collecting solid waste within the City, including C&D waste, are required to obtain AB 939 Compliance Permits and to transport C&D waste to City certified C&D processing facilities. These facilities process received materials for reuse and have recycling rates that vary from 71.0 percent to 90.6 percent.[169]

Furthermore, the Project would comply with LAMC Section 66.32, which incorporates CALGreen Code Section 5.408, which would ensure that at least 65 percent of the demolition and construction waste generated would be recycled and/or salvaged. The City's SWIRP, most commonly known as the City's Zero Waste Plan, provides a long-term plan through 2030 for the City of Los Angeles's solid waste programs, policies, and environmental infrastructure. The SWIRP aims for the City to achieve a goal of 90 percent diversion by 2025.[170]

In sum, the amount of solid waste expected to be generated by the Project during construction and operation is within the available capacities of area landfills. Thus, the Project's impacts related to solid waste would be less than significant, and no mitigation measures are required.

---

[167] CalRecycle, Compliance Orders, https://calrecycle.ca.gov/lgcentral/enforcement/compliance/#:~:text=Introduction,do%20one%20of%20the%20following. Accessed December 9, 2025.

[168] LASAN, 2021 Annual Report, https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=17450&hp=yes&type=PDF. Accessed November 14, 2025.

[169] LASAN, Construction & Demolition Recycling, https://sanitation.lacity.gov/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r/s-lsh-wwd-s-r-cdr?_afrLoop=16671480505481630&_afrWindowMode=0&_afrWindowId=null&_adf.ctrl-state=ulazozqw0_1#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D16671480505481630%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dulazozqw0_5. Accessed December 9, 2025.

[170] LASAN, Solid Waste Integrated Resources Plan, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-zwswirp?_afrLoop=18725113866790843&_afrWindowMode=0&_afrWindowId=null&_adf.ctrl-state=17nhb0cqxu_1#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D18725113866790843%26_afrWindowMode%3D0%26_adf.ctrl-state%3D17nhb0cqxu_5. Accessed November 25, 2025.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): (1) source reduction; (2) recycling and composting; and (3) environmentally safe transformation and land disposal. In addition, AB 1327 provided for the development of the California Solid Waste Reuse and Recycling Access Act of 1991, which requires the adoption of an ordinance by any local agency governing the provision of adequate areas for the collection and loading of recyclable materials in development projects.

Furthermore, AB 341, which became effective on July 1, 2012, requires businesses and public entities that generate four cubic yards or more of waste per week and multi-family dwellings with five or more units, to recycle. The purpose of AB 341 is to reduce GHG emissions by diverting commercial solid waste from landfills and expanding opportunities for recycling in California. In addition, in March 2006, the Los Angeles City Council adopted RENEW LA, a 20-year plan with the primary goal of shifting from waste disposal to resource recovery within the City, resulting in "zero waste" by 2030. The "blueprint" of the plan builds on the key elements of existing reduction and recycling programs and infrastructure and combines them with new systems and conversion technologies to achieve resource recovery (without combustion) in the form of traditional recyclables, soil amendments, renewable fuels, chemicals, and energy. The plan also calls for reductions in the quantity and environmental impacts of residue material disposed in landfills. Additionally, in October 2014, Governor Jerry Brown signed AB 1826, requiring businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste generated per week. Specifically, businesses that generate four or more cubic yards of organic waste per week must arrange for organic waste recycling services.

The City's SWIRP provides a long-term plan through 2030 for the City's solid waste programs, policies, and environmental infrastructure. The SWIRP aims for the City to achieve a goal of 90 percent diversion by 2025. This targeted diversion rate would be implemented through an enhancement of existing policies and programs such as implementing additional downstream programs (e.g., adding textiles to the blue bin recycling program; adding food scraps to the green bin recycling program; and requiring private solid waste collection service to provide access to multifamily and commercial customers); implementation of mandatory participation programs for residential, government, commercial, industrial, and institutional users; requiring transfer stations and landfills to provide resource recovery centers; and increased diversion requirements at C&D facilities pursuant to new policies and programs, and the development of future recycling facilities.

Since the Project would comply with all applicable federal, State, and local statutes and regulations related to solid waste, the Project's impacts regarding solid waste reduction regulations would be less than significant, and no mitigation measures are required.

Cumulative Impacts

Water Supply

All of the Related Projects will be subject to City review to assure that the existing public utility facilities would be adequate to meet the domestic water and fire water demands of each project. Developers are required to improve and/or fund facilities where appropriate, and development cannot proceed without

appropriate verification and approval by LADWP and LAFD. Required improvements by Related Projects, if they should occur, would likely be limited to minor, local improvements, and such improvements would likely require only minor construction with very limited short-term construction impacts. As noted above, the project would not require improvements to local mainlines.

LADWP, as a public water service provider, is required to prepare and periodically update an UWMP to plan and provide for water supplies to serve existing and projected demands within its jurisdiction. The UWMP prepared by LADWP is based on the growth projections that are provided in the SCAG RTP/SCS, which is updated on 4-year cycles to account for changes in growth rates and which accounts for existing development within the City, as well as projected growth anticipated to occur through redevelopment of existing uses and development of new uses. Each of the Related Projects would need to be consistent with the SCAG RTP/SCS projections in order to be accounted for in LADWP's UWMP current and projected available water demand. As the LADWP's UWMP is based on growth projections in the SCAG RTP/SCS, no significant cumulative water supply impact is anticipated from cumulative development.

As discussed above, the Project's net demand on water supplies would fall within the available and projected water supplies projected in LADWP's UWMP. The Related Projects would be required to provide local connections subject to review for service availability and subject to LADWP water system rules and requirements. The Project's contribution to a cumulative impact on water supply would thus not be cumulatively considerable, and the cumulative impact regarding water supply would be less than significant.

Wastewater

The Project may result in the additional generation of sewer flow. However, as discussed above, BOS has conducted an analysis of existing and planned capacity as it relates to the Project and has determined that the capacity is sufficient. Similarly, if the Related Projects required connection to the sewer system, they would also be required to obtain sewer connection permits and to submit SCARs to BOS during the design phase of the projects. As with the Project, all of the Related Projects would be subject to the provisions of the LAMC requiring provision of on-site infrastructure, improvements to address local capacity issues, and the payment of fees for future sewerage replacement and/or relief improvements. The analysis by the BOS takes into consideration previously approved SCARs as part of their review. If system upgrades are required as a result of a given project's additional flow, arrangements would be made between the Related Project and BOS to construct the necessary improvements.

Wastewater generated by the Project would be conveyed via the existing wastewater conveyance systems for treatment at the Hyperion Treatment Plant system. As previously stated, based on information from BOS, the existing design capacity of the Hyperion Service Area is approximately 550 MGD and the existing average daily flow for the system is approximately 300 MGD. Currently, up to 300 MGD is treated at the Hyperion Treatment Plant, resulting in a treatment capacity of 150 MGD. The estimated wastewater generation increase of the Project would be 0.007 MGD, which represents less than one percent of the available capacity in the system. The Related Projects would also be required to adhere to the BOS's annual wastewater flow increase allotment. Therefore, cumulative impacts on wastewater treatment capacity would be less than significant.

Electricity

As discussed in Section 4.6, *Energy*, LADWP would continue to expand delivery capacity as needed to meet demand increases within its service area at the lowest cost and risk consistent with LADWP's environmental priorities and reliability standards. LADWP has indicated that the Power Strategic Long-Term Resource Plan incorporates the estimated electricity requirement for the Project. The Power Strategic Long-Term Resource Plan considers future energy demand, advances in renewable energy resources and technology, energy efficiency, conservation, and forecast changes in regulatory requirements. Development projects within the LADWP service area would also be anticipated to incorporate site-specific infrastructure improvements, as necessary. Each of the Related Projects would be reviewed by LADWP to identify necessary power facilities and service connections to meet the needs of their respective projects. Related Projects would be required to provide for the needs of their individual projects, thereby contributing to the electrical infrastructure in the Project area. As such, the Project's contribution to cumulative impacts with respect to electricity infrastructure would not be cumulatively considerable, and thus cumulative impacts would be less than significant.

Telecommunications

Telecommunications are regulated by the Federal Communications Commission and California Public Utilities Commission (CPUC). Each of the Related Projects would be reviewed by the City to identify necessary new facilities and service connections to meet their respective needs, as applicable. The Project's contribution to cumulative impacts with respect to telecommunications as well as infrastructure would not be cumulatively considerable, and thus cumulative impacts would be less than significant.

Solid Waste

Solid waste disposal is a regional issue addressed by regional agencies, in this case the County of Los Angeles. The County promotes the efforts of individual jurisdictions to maximize waste reduction and recycling, expand existing landfills, and promote alternative technologies to reduce waste. Most notably, the City, as part of its SWIRP, aims to achieve a goal of 90 percent diversion by 2025. The analysis of the Project's potential impacts above is based on landfill capacity and demand per the ColWMP. Planning for landfill needs takes into account continuing cumulative demand and increases in cumulative demand associated with growth, including construction and operation of projects. Therefore, the analyses associated with that plan take into account cumulative development.

Like the Project, the Related Projects would be required to comply with applicable regulations related to construction and operation of solid waste, including those pertaining to waste reduction and recycling. Detailed components regarding waste reduction and recycling would be finalized for each Related Project on a project-by-project basis at the time of plan submittal to the City for the necessary building permits and reviews conducted pursuant to the L.A. Green Building Code, as applicable. As such, impacts to solid waste from Related Projects would be less than significant. As discussed above, the Project would not generate solid waste that would exceed landfill capacities and the recycling of solid waste related to construction and operation of the Project would be required to comply with all federal, State, and local regulations, including the L.A. Green Building Code and the SWIRP.

Therefore, the Project's contribution to cumulative impacts would not be cumulatively considerable, and cumulative impacts related to solid waste would be less than significant.

4.20 WILDFIRE

ENVIRONMENTAL IMPACTS Issues	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. The Project Site is located in a highly urban area and is currently developed with an existing commercial building and surface parking lot. The Project Site is identified as a No Fire Hazard Severity Zone in a Local Responsibility Area, per Government Code Section 51178. The Project Site is not located in an area of moderate, high, or very high fire hazard.[171] Additionally, the Project is not located in or near state responsibility areas of lands classified as very high fire hazard severity zones.[172] As the Project is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones, with respect to wildfire hazards, the Project's construction and operation would not result in the impairment of an adopted emergency response plan or emergency evacuation plan. Therefore, no impacts would occur, and no mitigation measures are required.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact. The Project Site is not located in a hillside area and is not located in an area of moderate, high, or very high fire hazard. Additionally, the Project is not located in or near state responsibility areas of lands

[171] CAL FIRE, Find your Fire Hazard Severity Zone, https://experience.arcgis.com/experience/5065c998b4b0462f9ec3c6c226c610a9. Accessed November 11, 2025.
[172] CAL FIRE, Find your Fire Hazard Severity Zone.

classified as very high fire hazard severity zones. As the Project is not located on a slope or a particularly windy area, nor in or near state responsibility areas or lands classified as very high fire hazard severity zones, with respect to wildfire hazards, the Project's construction and operation would not expose people to risks of wildfire or uncontrolled spread of a wildfire. Therefore, no impacts would occur, and no mitigation measures are required.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact. The Project Site is not located in an area of moderate, high, or very high fire hazard. Additionally, the Project Site is not located near state responsibility areas of lands classified as very high fire hazard severity zones. Furthermore, the Project does not propose the installation or maintenance of any infrastructure like roads, fuel breaks, or power lines that could exacerbate fire risk or result in temporary or ongoing impacts to the environment. Therefore, no impacts would occur, and no mitigation measures would be required.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. The Project Site is not located in an area of moderate, high, or very high fire hazard. Additionally, the Project Site is not located in or near state responsibility areas of lands classified as very high fire hazard severity zones. The Project Site is surrounded by urban development and is not adjacent to any wildlands. The Project Site is not located with a 100-Year or 500-Year flood plain.[173]

The Project Site is relatively flat with little topography that would expose people or structures to landslides. The Project would not contain uses or activities that would exacerbate existing environmental conditions. The Project Site is not located within a landslide inventory area.[174] Combined with the fact that the Project Site is not within or near a state responsibility area or a very high severity fire zone, there is no impact in relation to risks associated with downslope or downstream flooding or landslides as a result of runoff or post fire slope instability or drainage changes.

Therefore, no impacts would occur, and no mitigation measures would be required.

Cumulative Impacts

Neither the Project Site nor any of the sites of the Related Projects are located near or within the boundaries of a state responsibility area or land classified as very high fire hazard severity zone.[175] Moreover, as discussed above, the Project Site and the Related Projects are located in a highly urban developed area that is largely flat, that is not near any wildland areas, and that is served by extensive existing public infrastructure. Therefore, no cumulative impacts related to this issue would occur.

[173] FEMA, National Flood Hazard FIRMette.
[174] City of Los Angeles, ZIMAS, http://zimas.lacity.org/. Accessed November 11, 2025.
[175] CAL FIRE, Find your Fire Hazard Severity Zone.

4.21 MANDATORY FINDINGS OF SIGNIFICANCE

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

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

Less than Significant Impact with Mitigation Incorporated. The preceding analysis does not reveal any significant immitigable impacts to the environment. The Project Site is located within a highly urbanized area and is currently fully developed with a 56,072 sf, vacant four-story office building and surface parking.

As discussed in Section 4.2, *Biological Resources*, there is no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plan which applies to the Project. No wildlife corridors, native wildlife nursery sites, or bodies of water in which fish are present are located on the Project Site or in the surrounding area.

However, street trees adjacent to the Project Site could support raptor and/or songbird nests. Migratory nongame native bird species are protected by international treaty under the Federal MBTA of 1918 (50 C.F.R. Section 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take

of all birds and their active nests, including raptors and other migratory nongame birds (as listed under the Federal MBTA).

The Tree Evaluation for the Project Site found four Indian laurel street trees on Virgil Street. While the four trees are not a protected species, they fall under the jurisdiction of the City's Urban Forestry Division. The two northern trees would be removed to accommodate the Project's new transformer yard and new entry drive. The Project plans to retain the two southern trees. The Project will replace the two removed trees at a 2:1 ratio or pay the mandatory in-lieu fees in accordance with City regulations. By complying with regulatory compliance measures and City regulations, the Project's potential impacts upon migratory bird species would be less than significant.

The Project would not eliminate important examples of the major periods of California history or prehistory. As discussed in Section 4.5, *Cultural Resources*, there would be no direct or indirect impacts to historical resources. Additionally, with the Project's incorporation the City's condition of approval, potentially significant unforeseen impacts to archaeological resources would be less than significant. Similarly, impacts to human remains would be less than significant through adherence to applicable conditions of approval and state regulations. Regarding Tribal resources, based on the response letter from the Kizh Nation, the tribe concluded that the Project area possesses a high sensitivity for Tribal Cultural Resources. Those mitigation measures have been incorporated as **MM TCR-1**, **MM TCR-1a,** and **MM TCR-1b**. With incorporation of mitigation measures, impacts would be less than significant.

As discussed in Section 4.7, *Geology and Soils*, based on the results of the Paleontological Resources Assessment it was determined that construction of the Project has a potential to encounter paleontological resources, although unlikely. However, with the Project's adherence to the City's standard condition of approval, the Project would result in less than significant impacts to paleontological resources.

Overall, based on the preceding analysis of potential impacts, no evidence is presented that the Project would degrade the quality of the environment. Therefore, impacts would be less than significant with mitigation incorporated.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

Less Than Significant Impact. CEQA requires that the analysis of potential project impacts include cumulative impacts. CEQA defines cumulative impacts as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts."[176] This analysis of cumulative impacts need not be as in-depth as the analysis of the Project's impacts, but instead is to "be guided by the standards of practicality and reasonableness."[177] As listed in **Table 37** and **Figure 9**, the City identified 14 Related Projects within an approximately 0.5-mile radius of the Project Site.

[176] State CEQA Guidelines § 15355.
[177] State CEQA Guidelines § 15130(b).

The cumulative analyses for each environmental issue are provided following the assessments of Project impacts in each section above. The Related Projects are utilized to analyze cumulative impacts associated with Project implementation. As described above, due to the distance of most of the Related Projects from the Project Site and the physical conditions in the vicinity of the Project Site, and with the incorporation of the regulatory compliance measures and mitigation measures previously identified in this IS/MND, the Project would not have impacts that are individually limited but cumulatively considerable. Therefore, cumulative impacts would be less than significant.

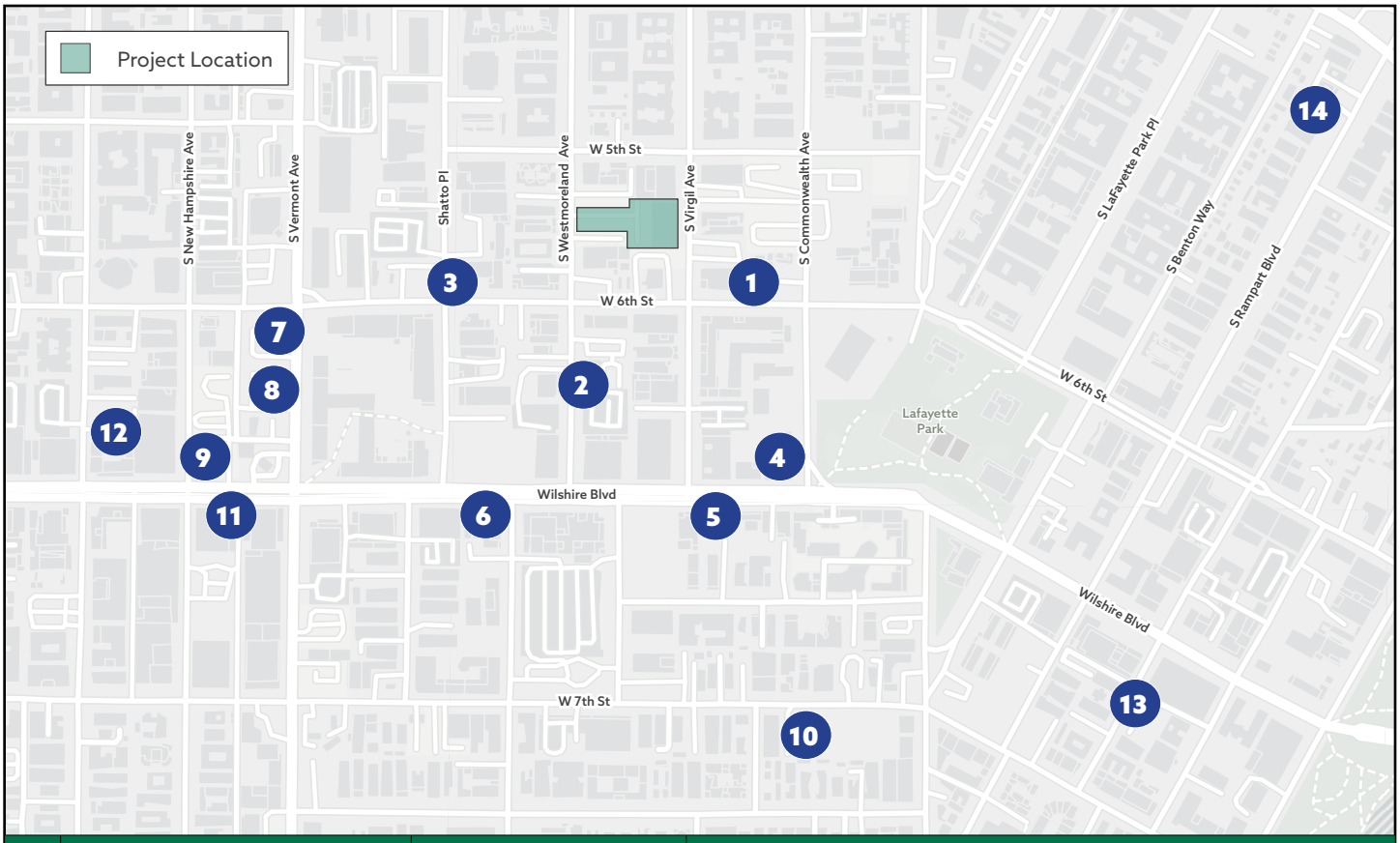
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant Impact. Based on the analyses presented in this IS/MND, with the incorporation of the mitigation measures identified in this IS/MND, the Project's environmental impacts would be less than significant. Therefore, the Project would not have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly, and the impacts would be less than significant.

Table 37: Related Projects List

Map No.	Land Use	Address	Description
1	Hotel & Restaurant	2965 W. 6th Street	99 Hotel Rooms
2	Mixed-Use	616 S. Westmoreland Avenue	77 Apartment Units 2,360 SF Restaurant 745 SF Retail
3	Mixed-Use	550 S. Shatto Place	283 Apartment Units 35 Affordable Housing Units 21,842 SF Commercial
4	Residential w/ Affordable Housing	639 S. Commonwealth Avenue	127 Apartment Units 15 Affordable Housing Units
5	Mixed-Use	3000 W. Wilshire Boulevard	190 Apartment Units (including 19 Affordable Housing Units) 867 SF Retail
6	Mixed-Use	3100 Wilshire Boulevard	264 Residential Units 33 Affordable Housing Units 7,370 SF Commercial
7	Mixed-Use	605 S. Vermont Avenue	103 Apartment Units 30,937 SF Museum
8	Mixed-Use	631 S. Vermont Avenue	200 Hotel Rooms 250 Condos Unit 49,227 SF Office 21,320 SF Retail
9	Fast Food with Drive-Through	3201 W. Wilshire Boulevard	3,865 SF of Fast Food with Drive-Through
10	Mixed-Use	2850 W. 7th Street	206 Apartment Units 7,500 SF Retail
11	Mixed-Use	3240 W. Wilshire Boulevard	162 Hotel Rooms 545 Apartment Units 5,222 SF Retail
12	Residential Complex	638 S. Berendo Street	163 Apartment Units
13	Mixed-Use	668 S. Coronado Street	122 Apartment Units 1,182 SF Retail

Map No.	Land Use	Address	Description
14	Residential Complex	329 S. Rampart Boulevard	53 Apartment Units (including 8 Affordable Housing Units)
Source: LADOT, July 2025.			



No	Project Name	Address	Project Type
1	Hotel & Restaurant	2965 W 6th St	99 hotel rooms
2	Mixed-Use	616 S Westmoreland Ave	77 apartment units, 2,360 sf restaurant and 745 sf retail
3	Mixed-Use	550 S Shatto Pl	283 apartment units, 35 affordable housing units and 21,842 sf commercial
4	Residential w/ Affordable Housing	639 S Commonwealth Ave	127 apartment units and 15 affordable housing units
5	Mixed-Use	3000 W Wilshire Blvd	190 apartment units (including 19 affordable housing units) and 867 sf retail
6	Mixed-Use	3100 Wilshire Blvd	264 residential units, 33 affordable housing units and 7,370 sf commercial
7	Mixed-Use	605 S Vermont Ave	103 apartment units and 30,937 sf Museum
8	Mixed-Use	631 S Vermont Ave	200 hotel rooms, 250 condos unit, 49,227 sf office and 21,320 sf retail
9	Fast Food with Drive-Through	3201 W Wilshire Blvd	3,865 sf of fast food with drive-through
10	Mixed-Use	2850 W 7th Street	206 apartment units and 7,500 sf retail
11	Mixed-Use	3240 W Wilshire Blvd	162 hotel rooms, 545 apartment units and 5,222 sf retail
12	Residential Complex	638 S Berendo St	163 apartment units
13	Mixed-Use	668 S Coronado St	122 apartment units and 1,182 sf retail
14	Residential Complex	329 S Rampart Blvd	53 apartment units (including 8 affordable housing units)

FIGURE 9: Related Projects

525 SOUTH VIRGIL AVENUE PROJECT

Kimley»Horn