CITY OF LOS ANGELES
DEPARTMENT OF CITY PLANNING
CITY HALL 200 NORTH SPRING STREET LOS ANGELES CA 90012

Mitigated Negative Declaration

Self Storage and Artist Suites Project

Case Numbers: ENV-2019-7321-MND
CPC-2019-7320-VZC-HD-CU-SPR-RDP

Project Location: 5444-5458 North Vineland Avenue, 5437-5451 North Cleon Avenue
Community Plan Area: North Hollywood - Valley Village
Council District: 2 - Paul Krekorian

Project Description: 1784 Capital Holdings, LLC ("Applicant") proposes the 5444-5458 N Vineland Avenue & 5437-5451 N Cleon Avenue Self Storage and Artist Suites Project ("Vineland and Cleon Project" or "Project"). The Project consists of the demolition of an existing light industrial building totaling approximately 4,277 Square Feet (SF) and surface parking lot to allow for the proposed construction, use, and maintenance of a new four-story building with one subterranean level that totals approximately 150,000 gross SF of building area. The proposed mixed-use building would provide space for internalized self-storage and commercial offices consisting of studios for visual and performing artists operated by a tenant called Artist and Makers Studios. The proposed four-story building reaches a height of 45 feet over one level of subterranean storage, and includes 63 automobile parking spaces and 32 bicycle parking spaces.

Prepared For:	**Prepared By:**	**Applicant:**
The City of Los Angeles Department of City Planning	Envicom Corporation	1784 Capital Holdings, LLC

October 2020

DRAFT INITIAL STUDY /
MITIGATED NEGATIVE DECLARATION

5444-5458 Vineland & 5437-5451 Cleon Avenue

Self Storage and Artist Suites Project

Source: EAPC Architects Engineers, June 2020

LEAD AGENCY:
City of Los Angeles
Department of City Planning
200 North Spring Street, Room 763
Los Angeles, CA 90012
Contact: Renata Ooms,
City Planning Associate
(213) 978-1222

PREPARED FOR:
1784 Capital Holdings, LLC
8777 N. Gainey Center Drive, Suite 191
Scottsdale, AZ 85258
Contact: Mr. Kelly McKone,
Executive Vice President of Real Estate
(602) 855-2552

PREPARED BY:
ENVICOM CORPORATION
4165 E. Thousand Oaks Blvd., Suite 290
Westlake Village, CA 91362
Contacts: Mr. Mitchel Morrison
Project Manager
(818) 879-4700

October 2020

5444-5458 VINELAND & 5437-5451 CLEON AVENUE SELF STORAGE AND ARTIST SUITES PROJECT

DRAFT INITIAL STUDY/ MITIGATED NEGATIVE DECLARATION

Environmental Case Number:
ENV-2019-7321-MND

Lead Agency:

CITY OF LOS ANGELES
DEPARTMENT OF CITY PLANNING
200 North Spring Street, Room 763
Los Angeles, CA 90012
Contact: Renata Ooms, City Planning Associate
(213) 978-1222

Prepared for:

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Contact: Mr. Mitchel Morrison, Project Manager
(818) 879-4700

October 2020

SECTION **PAGE NUMBER**

TABLES

FIGURES

APPENDICES

1.0 INTRODUCTION

The purpose of this Initial Study/Mitigated Negative Declaration is to disclose, evaluate, and mitigate the environmental impacts of the 5444-5458 N Vineland Avenue & 5437-5451 N Cleon Avenue Self Storage and Artist Suites Project.

PROJECT SUMMARY

The 5444-5458 N Vineland Avenue & 5437-5451 N Cleon Avenue Self Storage and Artist Suites Project consists of the demolition of a light industrial building that totals approximately 4,277 square feet (SF) and surface parking lot to allow for the proposed construction, use, and maintenance of a new four-story building with one subterranean level that totals approximately 150,000 gross SF of total floor area for self-storage and artist studios in the North Hollywood community of the City of Los Angeles.

LEGAL AUTHORITY

As lead agency, the City of Los Angeles prepared this Initial Study in accordance with the California Environmental Quality Act (CEQA) of 1970 (Public Resources Code 21000–21189) and relevant provisions of the *CEQA Guidelines* (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000–15387), as amended.

Initial Study. Section 15063(c) of the CEQA Guidelines defines an Initial Study as the proper preliminary method of analyzing the potential environmental consequences of a project. To paraphrase from this Section, the relevant purposes of an Initial Study are:

(1) To provide the Lead Agency with the necessary information to decide whether to prepare an Environmental Impact Report (EIR) or a Mitigated Negative Declaration (MND);
(2) To enable the Lead Agency to modify a project, mitigating adverse impacts, thus avoiding the need to prepare an EIR; and
(3) To provide sufficient technical analysis of the environmental effects of a project to permit a judgment based on the record as a whole, that the environmental effects of a project have been adequately mitigated.

Negative Declaration or Mitigated Negative Declaration. CEQA Guidelines Section 15070 states a public agency shall prepare a negative declaration or mitigated negative declaration for a project subject to CEQA when:

(a) The initial study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment; or
(b) The initial study identifies potentially significant effects, but:
    1. Revisions in the project plans or proposals made by, or agreed to by the applicant before a proposed mitigated negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and
    2. There is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment.

An MND may be used to satisfy the requirements of CEQA when a project would have no significant unmitigable effects on the environment.

2.0 FINDINGS OF THIS INITIAL STUDY

The impact analysis in this Initial Study demonstrates that with the incorporation of mitigation measures, the 5444-5458 N Vineland Avenue & 5437-5451 N Cleon Avenue Self Storage and Artist Suites Project would have a less than significant impact on the environment with regard to all CEQA Environmental Checklist topics. For each topic addressed in Chapter 4.0, the impacts associated with development of this Project have been determined to be "Potentially Significant Unless Mitigation Incorporated," "Less than Significant," or "No Impact." For topics determined to be "Potentially Significant Unless Mitigation Incorporated," the mitigation measures identified would reduce impacts to below a level of significance.

3.0 PROJECT DESCRIPTION

1784 Capital Holdings, LLC ("Applicant") proposes the 5444-5458 N Vineland Avenue & 5437-5451 N Cleon Avenue Self Storage and Artist Suites Project ("Vineland and Cleon Project" or "Project"). The Project consists of the demolition of an existing light industrial building totaling approximately 4,277 Square Feet (SF) and surface parking lot to allow for the proposed construction, use, and maintenance of a new four-story building with one subterranean level that totals approximately 150,000 gross SF of building area. The proposed mixed-use building would provide space for internalized self-storage and commercial offices consisting of studios for visual and performing artists operated by a tenant called Artist and Makers Studios. The proposed building includes associated customer and employee parking, site landscaping, signage, and exterior lighting for displays and security.

3.1 LOCATION, ZONING, AND EXISTING USES

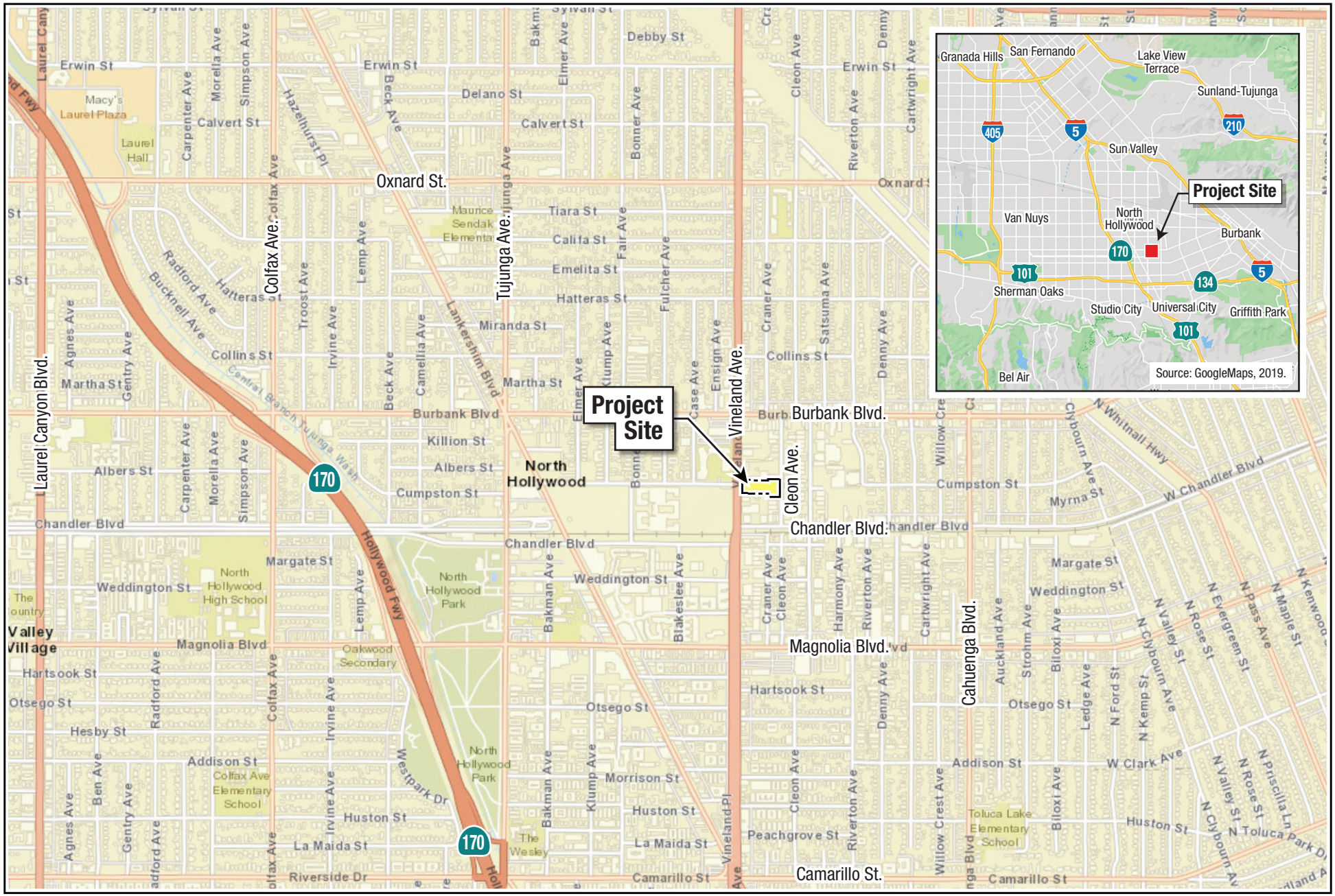
The Project is located in the North Hollywood – Valley Village Community Plan ("North Hollywood" or "NoHo") area of the City of Los Angeles (City), as shown in **Figure 1, Location Map**. The Project location is between Vineland Avenue and Cleon Avenue as shown in **Figure 2, Vicinity Map**. Street addresses associated with the Project location are 5444-5458 N Vineland Avenue and 5437-5451 N Cleon Avenue, Los Angeles, California, 91601. Seven parcels encompass the Project Site (Subject Property or Project Site), three of which are located on N. Vineland Avenue and four of which are located on N. Cleon Avenue. The net site area of the seven APNs[1] that encompass the Project Site is approximately 71,011 SF (1.63 acres).[2]

The North Hollywood – Valley Village Community Plan designates the Subject Property for Light Manufacturing uses. The Subject Property is currently zoned MR2-1VL (Restricted Light Industrial zone in Height District No. 1VL). The 1VL Height District permits a maximum height of 45 feet, three stories, and a Floor Area Ratio (FAR) of 1.5:1. The Subject Property is located within the proposed Orange Line Transit Neighborhood Plan, which is anticipated to modify zone designations and increase allowable FAR and height throughout the vicinity. Part of the proposed Orange Line Transit Neighborhood Plan would update zone designations throughout the vicinity, with FAR as high as 4:1 currently being considered for the Project Site. To allow for the proposed mix of uses, a FAR up to 2:1, and height up to four stories, the Project requests a Vesting Zone Change and Height District Change from MR2-1VL to M2-2D (Light Manufacturing zone in Height District No. 2 with "D" Development Limitations). The Subject Property is within the jurisdiction of the North Hollywood Redevelopment Project area (in which it has an Industrial Light designation) and within a Transit Priority Area. The Subject Property is also within the Los Angeles State Enterprise Zone and is currently classified as a Tier 3 Transit Oriented Communities site.

The Subject Property is currently improved with a single-story light industrial building used for an equipment rental business. This studio equipment rental business, Zio Rental Studios, currently occupies the majority of the Project Site and Archer Towing occupies a small area in the northwest corner of the Project Site for vehicle impound as shown in **Figure 3, Existing Uses**. The following summarizes the existing land uses surrounding the Subject Property. Surrounding properties to the north, east, and south are zoned MR2-1VL and designated for light manufacturing land uses in the North Hollywood – Valley Village Community Plan.

[1] The Project Site is assigned Assessor Parcel Numbers ("APNs") 2416-001-041, -042, -043, -014, -015, -016, and 2416-002-001.

[2] EAPC Architecture, Preliminary Plot Plan, SP100, 10/05/2020.



Sources: ESRI, World Street Map, 2016.

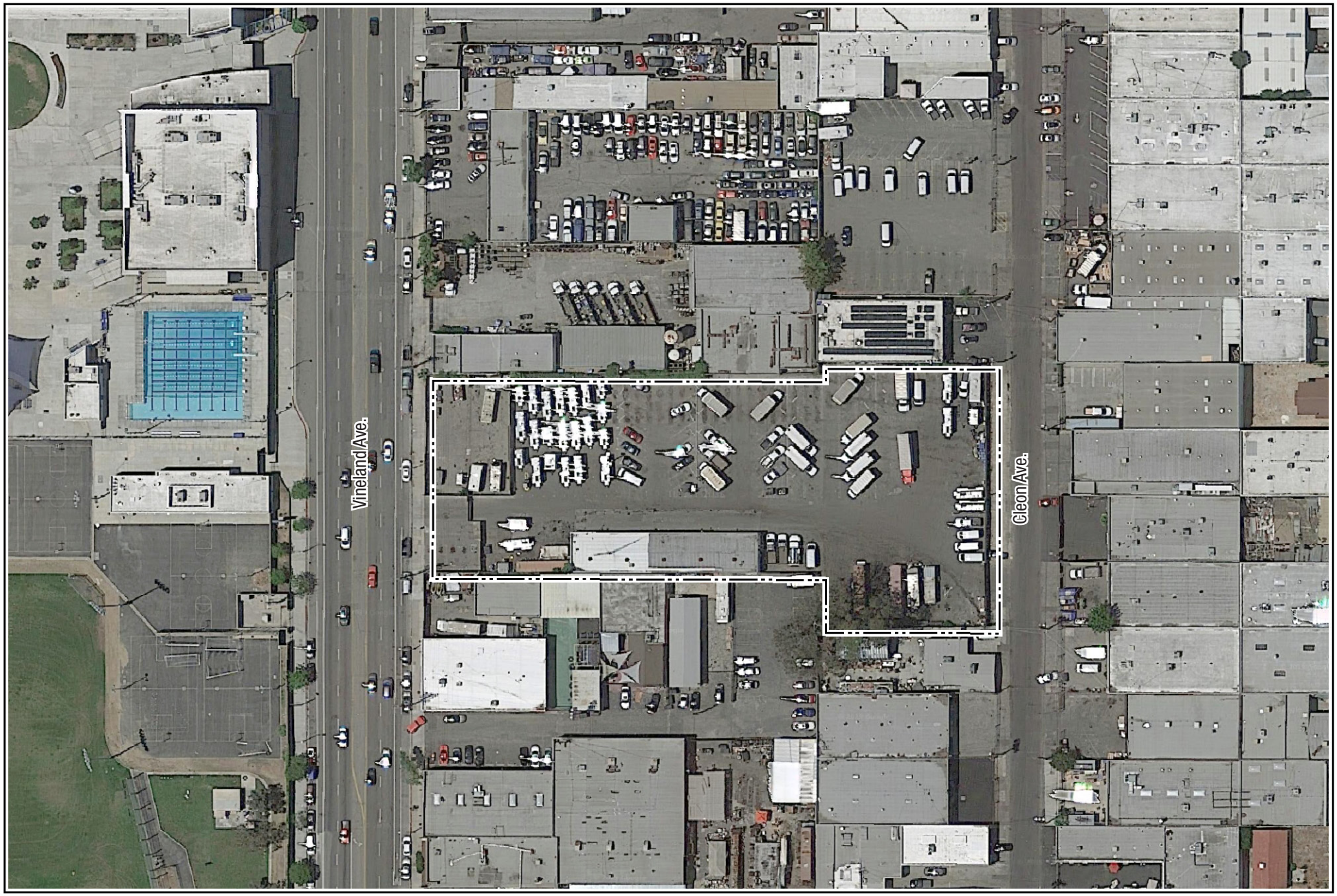
VINELAND AND CLEON SELF STORAGE PROJECT

envicom

Location Map

0 750 1,500 Feet

FIGURE 1



Sources: Google Earth Pro, June 8, 2018.

VINELAND AND CLEON SELF STORAGE PROJECT

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Vicinity Map

0 50 100 Feet

FIGURE 2

Aerial Source: Google Earth Pro, June 8, 2018. Map Source: Roux Associates, Inc., Phase II Subsurface Investigation Letter Report, November 14, 2019.

VINELAND AND CLEON SELF STORAGE PROJECT

envicom

Existing Uses

0 30 60 Feet

FIGURE 3

- Properties to the north consist equipment rental, storage facilities, repair shops, and neighborhood-serving retail.
- Properties to the east, along Cleon Avenue, consist of media production facilities and light manufacturing.
- Properties to the south consist of a media production facility, self-storage facilities and neighborhood-serving retail, including a fitness facility.
- Property to the west, across Vineland Avenue, is zoned Public Facilities (PF-1VL) and Commercial Manufacturing (CM-1VL), and is the location of the East Valley High School campus, as well as an Anawalt Lumber & Materials further north at the intersection of Burbank Boulevard.

3.2 PROJECT COMPONENTS

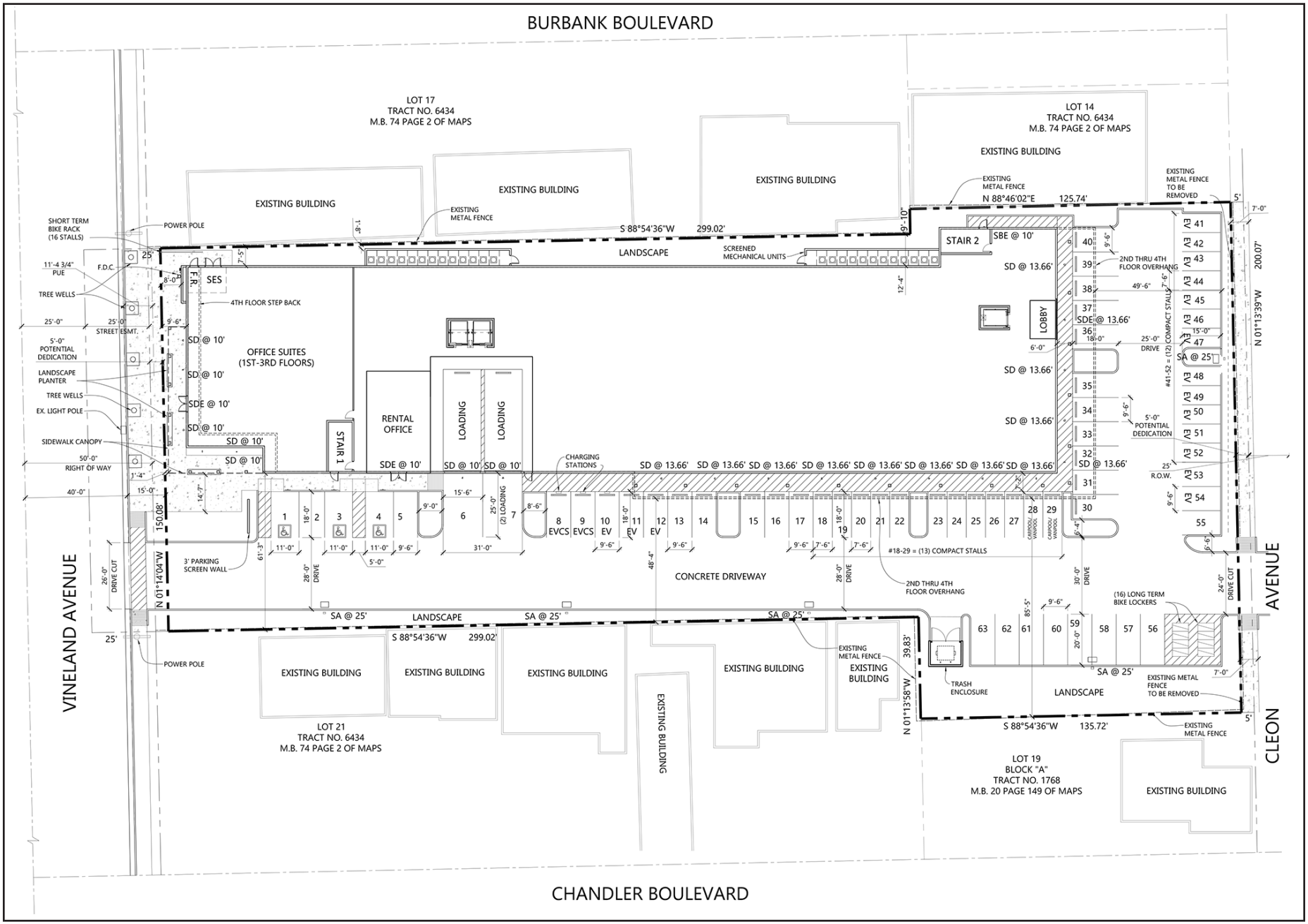
The Applicant requests approvals for the construction, use, and maintenance of a mixed-use building with a primary use for the storage of household goods and offices for artist studios. The proposed four-story building reaches a height of 45 feet over one level of subterranean storage, and includes 63 automobile parking spaces and 32 bicycle parking spaces.[3] A preliminary site plan is shown in **Figure 4, Proposed Site Plan**. Proposed hours of operation are as follows:

- Self-storage office hours (staffed): Monday through Saturday, 8:00 AM to 6:00 PM and Sunday, 9:00 AM to 4:00 PM;
- Self-storage secure customer access: Sunday through Saturday, 5:00 AM to 10:00 PM; and,
- Office suites use (Artist & Maker's Studios) secure access: 24 hours a day, seven days a week.

The proposed building includes self-storage units in the basement and on all four floor levels, as well as artist studios in the first through third floors, a gallery on the ground floor, and display space on the second and third floors, respectively, and a ground-floor rental office and loading dock.

The primary use of the Project is the storage of household goods also known as "self-storage." A component of the Project also includes office uses for artist studios located on the first through third floor, thereby engaging the street frontage between Vineland Avenue and the Project Site. The Applicant intends the office use to be occupied by a tenant known as Artists & Makers Studios, which provides shared office, studio, and resource space to professional visual and performing artists. The Applicant's business strategy is to fulfill the growing demand for quality storage in emerging markets through the ongoing development, acquisition, and repositioning of existing big-box retail-type properties, as well as the purchase and re-design of strategically located, yet poorly optimized, storage facilities in conjunction with a geographically-relevant, neighborhood-serving use such as Artists & Makers Studios. Together, these uses result in a mixed-use Project proximate to the NoHo Arts District. The size of the proposed building area is provided in **Table 3-1, Floor Area**.

[3] Per LAMC Section 12.03, height is measured to the highest point of roof or parapet, whichever is higher. Exceptions per Section 12.21.1 B. include equipment for building operation, skylights, towers, or similar structures above the height limit when set back from the roof perimeter by 5 feet; chimney, exhaust ducts, solar water heaters, any roof structures housing stairways, elevators or ventilation fans may exceed height up to five feet with no setback. Roof structures for housing elevators and stairways may exceed the height limit up to 10 feet, where a building is limited to 30 or 45 feet. Furthermore, in all zones, solar structures may exceed the roof surface by three (3) feet, even if the roof structure is at or above the allowable building height limit. The height shall be measured to the highest point of the structure and panel assembly. Solar structures are not required to provide a setback.



Source: EAPC Architects Engineers, October 5, 2020.

Proposed Site Plan

As shown in Table 3-1, demolition of the existing building would remove approximately 4,277 SF of floor area, the Project proposes 138,141 SF of net floor area (calculated pursuant to LAMC Section 12.03); therefore, the proposed new building would result in a net increase of 133,864 SF in floor area on the Project Site. To analyze the full physical impact of the Project on the environment, this document refers to the total gross floor area of 150,000 SF shown in Table 3-1.

Table 3-1
Floor Area

Floor	Area (SF)
Existing Floor Area	
Existing Light Industrial Building	4,277
Proposed Floor Area	
Office/Artist Studio	
1st Floor	5,040
2nd Floor	5,040
3rd Floor	5,040
Office/Artist Studio Sub-Total	*15,120*
Self-Storage	
Basement	28,156
1st Floor (street-level)	22,376
2nd Floor	26,375
3rd Floor	26,375
4th Floor	30,858
Self-Storage Sub-total	*134,140*
Storage Rental Office	740
Total Floor Area (Gross)	**150,000**
Proposed Building Area Not Included as Floor Area [1]	- 11,859
Total Floor Area	138,141
Existing Floor Area to be Demolished	- 4,277
Net Increase in Floor Area	*133,864*

[1] Building area not included as floor area consists of exterior walls, storage rooms, interior loading area, stairs, elevators, fire risers, electrical room, and janitor room.
Source: EAPC Architects Engineers, Preliminary Plot Plan, SP100, 10/05/2020.

The proposed building will be sustainably designed to meet or exceed applicable City building codes and Building Energy Efficiency Standards - Title 24 ("Title 24") specified in the California Code of Regulations. As such, the Project will incorporate eco-friendly building materials, systems, and features wherever feasible, including Energy Star appliances, low flow fixtures, non-Volatile Organic Compound paints/adhesives, drought tolerant planting, and high-performance building envelopment.

3.3 PARKING, ACCESS, AND CIRCULATION

A driveway connecting to Vineland Avenue and Cleon Avenue will provide vehicular ingress and egress to the Project Site for access. The new Project driveways will be located at approximately the same locations as the existing driveways with improvements as needed. Automobile parking is provided in a surface parking lot with 63 spaces that wraps around the southerly and easterly sides of the proposed building, as shown in Figure 4, Proposed Site Plan.

In terms of bicycle access, Tier 1 (protected) bicycle lanes exist on along the Project Site frontage with Vineland Avenue. The Project will provide 16 short-term and 16 long-term spaces for bicycle parking. The Bicycle Master Plan of the Mobility Element identifies Chandler Boulevard, from Lankershim

Boulevard to the eastern City limit, as part of the Bicycle-Enhanced Network. An existing bike path along the south side of Chandler Boulevard provides bicycle access to the Project Site from Vineland Avenue. The Bicycle-Enhanced Network identifies Lankershim Boulevard as a Tier 1 roadway for a protected bicycle lane in the vicinity of the Project Site.

In terms of pedestrian access, Mobility Plan 2035 identifies the portion of Vineland Avenue fronting the Project Site as a part of the Pedestrian Enhanced District in the Neighborhood Enhanced Network. Pedestrian Enhanced Districts include streets where pedestrian improvements are prioritized to provide safe and enjoyable walking connections to and from major destinations within communities. Mobility Plan 2035 designates the portion of Vineland Avenue along the Project's western boundary as Boulevard II and the portion of Cleon Avenue that serves as the Project's eastern boundary as a designated Standard Local Street. In accordance with City Bureau of Engineering requirements, the Project will provide five-foot dedications along Vineland Avenue and along Cleon Avenue.[4] No new driveways will be provided for the Project. The five-foot dedication along Vineland Avenue will provide wider sidewalks and new street activation space along the Vineland Avenue frontage by adding suites for visual and performing artists and indoor and outdoor spaces for artistic programming.

3.4 DEMOLITION AND CONSTRUCTION

The Project would demolish approximately 4,277 SF of existing structures and remove the existing surface parking lot. The existing surface parking lot consists of approximately 68,000 SF of asphalt with 4,500 SF of slab on grade.[5] A preliminary estimate of the duration for each phase of construction, size of the on-site workforce, and off-road equipment needed is provided in **Table 3-2, Demolition and Construction Assumptions**.

Table 3-2
Demolition and Construction Assumptions

Phase	Duration	Crew	Equipment Type	Number of pieces
Demolition	20 days	25 workers	Concrete Saw	1
			Dozers	1
			Tractor/Loader/Backhoes	3
Grading	15 days	15 workers	Excavators	1
			Graders	1
			Rubber Tired Dozers	1
			Tractors/Loaders/Backhoes	3
Building Construction	200 days	25 – 100 workers	Cranes	1
			Forklift	1
			Generator Sets	1
			Welders	3
			Tractors/Loaders/Backhoes	1
Paving	10 days	25 workers	Cement and Mortar Mixer	1
			Paver	1
			Paving Equipment	1
			Rollers	1
			Tractor/Loader/Backhoe	1
Architectural Coating	20 days	15 workers	Air Compressor	1
Source: Larry Damato, Principal at DAI General Contracting, email correspondence with Envicom Corporation, December 30, 2019.				

[4] City of Los Angeles, Bureau of Engineering Planning Case Referral Form 201900542.
[5] Source: Larry Damato, Principal at DAI General Contracting, email correspondence with Envicom Corporation, December 30, 2019.

As shown in Table 3-2, demolition and construction necessitates the use of off-road earth moving equipment such as dozers, forklifts, and tractors equipped with front end loaders and backhoes. Construction also involves trucks for material and supplies delivery, as well as powered hand tools including concrete saws. The Subject Property has sufficient space for temporary construction crew parking and equipment staging to take place on site during all phases of construction, thereby minimizing the interference of construction vehicles with existing vehicle circulation. The grading phase of construction would result in export of 12,500 cubic yards (CY) of soil.[6] The likely destination for export is the Simi Valley Landfill. To minimize the impact of temporary construction activity on the performance of the local circulation system and adjacent uses, Project Design Feature (PDF)-1 requires the preparation of a Construction Traffic Management Program.

PDF-1 Construction Traffic Management Program: A Construction Traffic Management Program, including but not limited to, lane closure or modification information, hauling, staging, and temporary access and parking plans, as necessary, shall be prepared by the Project construction contractor and submitted to the City for review and approval. The Construction Traffic Management Program shall convey the specific actions of the construction process, with focus on the activities that may potentially affect off-site rights-of-way. The Construction Traffic Management Program shall be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and shall include, but not be limited to, the following elements, as appropriate:

- Construction vehicle and equipment parking or staging on surrounding public streets shall be minimized to the extent feasible.
- Temporary vehicular traffic controls (such as signage and/or flag persons) during construction activities adjacent to public rights-of-way to improve traffic flow on public roadways shall be implemented.
- Safety precautions for pedestrians and bicyclists, through such measures as signage and protection barriers, shall be implemented, as appropriate.
- Construction-related activities (such as deliveries and/or hauling) shall be scheduled to occur outside the commuter peak hours.
- To avoid structural damage related to construction period vibration, loaded trucks shall be prohibited from operating within 15 feet of off-site structures.

REQUIRED APPROVALS

The Applicant is requesting the following entitlements and approvals from the City as Lead Agency under CEQA:

- **Vesting Zone Change and Height District Change.** Pursuant to Los Angeles Municipal Code (LAMC or "Code") Sections 12.32.F and 12.32.Q, a Vesting Zone Change and Height District Change from MR2-1VL to M2-2D to allow for the proposed mix of self-storage and Artist & Makers Studios, proposed FAR up to 2:1, and proposed height up to four stories.
- **Conditional Use Permit (CUP).** Pursuant to LAMC Section 12.24.W.50, a CUP to allow a self-storage building in the M2 Zone, within 500 feet of an R Zone.
- **Determination in Association with a CUP Request.** Pursuant to LAMC Section 12.24.F, a Determination in association with a CUP request to permit a height increase to 45 feet, in lieu of the otherwise permitted 37 feet for self-storage buildings in M Zones.

[6] Larry Damato, Principal at DAI General Contracting, email correspondence with Envicom Corporation, December 23, 2019.

- **Site Plan Review (SPR).** Pursuant to LAMC Section 16.05, to permit the construction, use, and maintenance of a mixed-use project that results in an increase of more than 50,000 SF of non-residential floor area.
- **Project Compliance Review.** Pursuant to LAMC Section 11.5.4.D.5, to evaluate Project conformance with relevant provisions of the North Hollywood Redevelopment Plan.
- **Determination in Association with a CUP Request**. Pursuant to LAMC Section 12.24.S, a Determination in association with a CUP request to permit a parking reduction not to exceed 20% of the requirements otherwise required by the Code.

Pursuant to various LAMC sections, the Applicant will request approvals and permits from the Department of Building and Safety and other municipal agencies for Project construction actions which may include, and not be limited to demolition, excavation, shoring, grading, haul route, foundation, and building and tenant improvements.

4.0 INITIAL STUDY / MITIGATED NEGATIVE DECLARATION

CALIFORNIA ENVIRONMENTAL QUALITY ACT
INITIAL STUDY AND CHECKLIST

1. **Project title:**
   5444 – 5458 Vineland & 5437 – 5451 Cleon Avenue Self Storage and Artist Suites Project
2. **Lead agency name and address:**
   City of Los Angeles
   Department of City Planning
   200 N. Spring Street
   Los Angeles, CA 90012
3. **Contact person and phone number:**
   Renata Ooms, City Planning Associate
   200 North Spring Street, Room 763
   Los Angeles, CA 90012
   (213) 978-1222
4. **Project location:**
   5444 – 5458 Vineland Ave and 5437 – 5451 Cleon Ave, Los Angeles, CA 91601
5. **Project sponsor's name and address:**
   1754 Capital Holdings, LLC
   8777 N. Gainey Center Drive, Suite 191
   Scottsdale, AZ 85258
6. **General plan land use designation:**
   Light Manufacturing
7. **Zoning:**
   Existing: MR2-1VL. Proposed: M2-2D
8. **Description of project:**
   Demolition of a light industrial building that totals approximately 4,277 square feet (SF) and surface parking lot to allow for the proposed construction, use, and maintenance of a new four-story building with one subterranean level that totals approximately 150,000 gross SF of total floor area for self-storage uses and artist studios in the North Hollywood community of the City of Los Angeles.
9. **Surrounding land uses and setting:**
   Existing light industrial uses zoned MR2-1VL to the north of the Subject Property, Cleon Avenue and existing light industrial uses zoned MR2-1VL to the east, existing light industrial uses zoned MR2-1VL to the south, and Vineland Avenue with public facilities – East Valley High School – on land zoned CM-1VL to the west and PF-1VL to the southwest.
10. **Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.):**
    The City of Los Angeles is the only approval agency at this time.

CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012
CALIFORNIA ENVIRONMENTAL QUALITY ACT
PROPOSED MITIGATED NEGATIVE DECLARATION

LEAD CITY AGENCY: City of Los Angeles Department of City Planning		**COUNCIL DISTRICT: 2** Councilmember Paul Krekorian
PROJECT TITLE: 5444-5458 Vineland & 5437-5451 Cleon Ave Self Storage and Artist Suites Project	**ENVIRONMENTAL CASE:** ENV-2019-7321-MND	**CASE NO.** Case No. CPC-2019-7320-VZC-HD-CU-SPR-RDP

PROJECT LOCATION: 5444-5458 Vineland and 5437-5451 Cleon Ave, North Hollywood, CA 91601.

PROJECT DESCRIPTION: Demolition of a light industrial building that totals approximately 4,277 square feet (SF) and surface parking lot to allow for the proposed construction, use, and maintenance of a new four-story building with one subterranean level that totals approximately 150,000 gross SF of total building area for self-storage uses and artist studios in the North Hollywood community of the City of Los Angeles.

NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY
1784 CAPITAL HOLDINGS, LLC
8777 N. Gainey Center Drive, Suite 191
Scottsdale, AZ 85258
Contact: Mr. Kelly McKone, Executive Vice President of Real Estate
(602) 855-2552

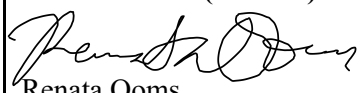
FINDING:
The Department of City Planning of the City of Los Angeles proposes a Mitigated Negative Declaration be adopted for this Project because the mitigation measures outlined in the attached pages will reduce any potential significant adverse effects to a less than significant level.

(continued on next page)

SEE ATTACHED SHEETS FOR ANY MITIGATION MEASURES IMPOSED.

Any written comments received during the public review period are attached together with the response for the Lead City Agency. The Project decision-makers may adopt the mitigated negative declaration, amend it, or require preparation of an Environmental Impact Report (EIR). Any changes made should be supported by substantial evidence in the record and appropriate findings made.

THE INITIAL STUDY PREPARED FOR THIS PROJECT IS ATTACHED.

NAME OF PERSON PREPARING FORM	**TITLE**	**TELEPHONE NUMBER**
Renata Ooms	City Planning Associate	(213) 978-1222
ADDRESS	**SIGNATURE (Official)**	**DATE**
City of Los Angeles Dept. of City Planning 200 N Spring Street Los Angeles, CA 90012	 Renata Ooms, City Planning Associate	10/8/2020

CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012
CALIFORNIA ENVIRONMENTAL QUALITY ACT
INITIAL STUDY and CHECKLIST (CEQA Guidelines Section 15063)

<table>
<tr><td colspan="2">LEAD CITY AGENCY:
City of Los Angeles</td><td colspan="2">COUNCIL DISTRICT: 2
Councilmember Paul Krekorian</td><td>DATE:
October 8, 2020</td></tr>
<tr><td colspan="5">RESPONSIBLE AGENCIES: N/A</td></tr>
<tr><td colspan="2">ENVIRONMENTAL CASE:
ENV-2019-7321-MND</td><td colspan="3">RELATED CASES:
CPC-2019-7320-VZC-HD-CU-SPR-RDP</td></tr>
<tr><td colspan="2">PREVIOUS ACTIONS CASE NO.</td><td colspan="3">☐ DOES have significant changes from previous actions.
☒ DOES NOT have significant changes from previous actions.</td></tr>
<tr><td colspan="5">PROJECT DESCRIPTION: Demolition of a light industrial building that totals approximately 4,277 square feet (SF) and surface parking lot to allow for the proposed construction, use, and maintenance of a new four-story building with one subterranean level that totals approximately 150,000 gross SF of total building area for self-storage uses and artist studios in the North Hollywood community of the City of Los Angeles. (See Section 3.0, Project Description – Required Approvals).</td></tr>
<tr><td colspan="5">ENV. PROJECT DESCRIPTION: See Section 3.0, Project Description.</td></tr>
<tr><td colspan="5">ENVIRONMENTAL SETTING: The Project Site encompasses 1.63-acres in the North Hollywood – Valley Village Community Plan area of the City. Existing light industrial uses zoned MR2-1VL are located north of the Subject Property, Cleon Avenue and existing light industrial uses zoned MR2-1VL to the east, existing light industrial uses zoned MR2-1VL to the to the south, and Vineland Avenue with public facilities – East Valley High School – on land zoned CM-1VL to the west and PF-1VL to the southwest of the Subject Property.</td></tr>
<tr><td colspan="5">PROJECT LOCATION: 5444-5458 Vineland and 5437-5451 Cleon Ave, North Hollywood, CA 91601.</td></tr>
<tr><td colspan="2">COMMUNITY PLAN AREA:
North Hollywood – Valley Village

STATUS:
☐ Preliminary
☒ Proposed</td><td colspan="2">☒ Does Conform to Plan
☐ Does NOT Conform to Plan</td><td>AREA PLANNING COMMISSION:
South Valley</td><td>CERTIFIED NEIGHBORHOOD COUNCIL:
NoHo</td></tr>
<tr><td>EXISTING ZONING:
MR2-1VL</td><td>MAX DENSITY ZONING:
The 1VL Height District permits a maximum height of 45 feet, three stories, and a Floor Area Ratio (FAR) of 1.5:1.</td><td colspan="3"></td></tr>
<tr><td>GENERAL PLAN LAND USE:
Light Manufacturing</td><td>MAX. DENSITY PLAN:
Three stories or 45 feet.</td><td colspan="3"></td></tr>
</table>

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

☐ Aesthetics	☐ Agriculture and Forestry Resources	☐ Air Quality
☐ 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: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

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

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions 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. Therefore, an EIR Addendum will be prepared.

Name: Renata Ooms
Title: City Planning Associate
Dept. of City Planning, City of Los Angeles

Signature:  Date: 10/8/2020

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
I. 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, or other locally recognized desirable aesthetic natural feature within a city-designated 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 points). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d. Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Impact Analysis

The following analysis is based on the Architectural Plans dated October 5, 2020, prepared by EAPC Architects provided in **Appendix A**. This analysis is also based on a landscape plan dated December 10, 2019, prepared by T.J. McQueen & Associates, Inc. The Project is an employment center project in a Transit Priority Area (TPA); therefore, aesthetic impacts related to visual resources, aesthetic character, shade and shadow, light and glare, scenic vistas, or any other aesthetic impacts are not considered significant impacts for in-fill projects pursuant to CEQA, Public Resources Code Section 21099(d)(1).

a. No Impact. A significant impact may occur if a project introduces incompatible visual elements within a field of view containing a scenic vista, or substantially blocks views of a scenic vista. There are two types of scenic vistas: panoramic views (visual access to a large geographic area, for which the field of view can be wide and extend into the distance) and focal views (visual access to a particular object, scene, or feature of interest). The Project Site is located within the urbanized visual setting of the North Hollywood-Valley Village Community Plan area. The Community Plan does not designate scenic vistas, such as wide natural open spaces, parks, or viewsheds from hiking trails, within the vicinity. Nor does it establish focal views to be protected within the vicinity. Therefore, the Project would not introduce incompatible visual elements within a designated scenic vista or substantially block views of a designated scenic vista, the Project would have no impact.

Mitigation Measures: No mitigation measures are required.

b. No Impact. A significant impact would occur if scenic resources within a City-designated scenic highway would be damaged or removed by development of a project. The Project Site is not located along a designated scenic highway as identified in the Community Plan. The Project is not located in a designated historic district, and does not contain rock outcroppings. Therefore, the Project would result in no impact to scenic resources within a City-designated scenic highway.

Mitigation Measures: No mitigation measures are required.

c. Less than Significant Impact. A significant impact would occur if a project introduced incompatible visual elements on the site or visual elements incompatible with the character of the area surroundings. Projects in urbanized areas could have a significant impact if they conflicted with applicable zoning and other regulations governing scenic quality. The Project is located in an urbanized, commercial and industrial area. Views in the vicinity of the Project Site are largely constrained by adjacent structures within an urban setting. As described in the following analysis, the Project would not conflict with applicable zoning and other regulations governing scenic quality.

Building Height and Massing

As an in-fill development, the building height and massing of the proposed mixed-use building is similar to existing surrounding land uses. The Project is located in zoning Height District No. 1VL, which allows for a maximum height of 45 feet and three stories. With approval of the requested Vesting Zone Change and Height District Change to Height District 2 with "D" Limitations, the Project would contain a four-story building with a height of 45 feet over one subterranean level and would therefore comply with applicable height district limitations.

In terms of massing, an existing four-story building, East Valley High School, is located northwest of the Project Site, existing one-story commercial developments are located to the north, existing media production facilities and light industrial buildings are located to the east, each ranging from one to two stories in height. Existing self-storage and neighborhood-serving retail buildings are located to the south, ranging from one to three stories in height. Existing commercial and school facilities located west of the Project Site range from one to three stories in height. These existing buildings feature massing similar to that of the Project.

Landscape Design

Proposed landscaping along the Project Site perimeter consists of various trees and plants such as the London plane tree (*Plantanus wrightii*), live oak tree (*Quercus virginiana*), brake light red yucca (*Hesperaloe perpa*), orange jubilee (*Tecoma 'orange jubilee'*), twin flowered agave (*Agave gemniflora*), yellow dot (*Wedelia trilobata*), and India hawthorne (*Raphiolepsis indica*).[7] Details regarding tree replacements and removals are in Section IV, Biological Resources. The Department of City Planning would review the proposed landscape plan during the plan check process prior to issuance of a building permit. Installation of landscaping around the site perimeter, which currently contains no landscaping, would improve aesthetics from public viewpoints along Vineland Avenue, Cleon Avenue, and from neighboring facilities.

Graffiti and Vandalism

The Project includes walls that could provide space for graffiti and vandalism. The Project would employ professional staff to keep the site free of graffiti and debris and to maintain the appearance as attractive, clean, and safe for employees and customers. Pursuant to Los Angeles Municipal Code (LAMC) Section

[7] T.J. McQueen & Associates, Inc., Conceptual Landscape Plan, Sheet La.01, October 3, 2019.

91.8104.15, the Project would be required to maintain the exterior free from graffiti that could be visible from a public street or alley.

The Project would be of similar scale, mass, land use, and density as existing commercial and light industrial uses within the vicinity. Therefore, the Project would not introduce an incompatible visual element and would be consistent with applicable zoning codes and regulations governing scenic quality, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

d. Less than Significant Impact. A significant impact may occur if a project introduces new sources of light or glare that would be incompatible with the surrounding areas, or that pose a safety hazard to motorists on adjacent streets or freeways. Determining whether a proposed project results in a significant nighttime illumination impact must consider the change in ambient illumination levels as a result of proposed sources and the extent to which proposed lighting would spill off a project site and affect adjacent light-sensitive areas.

Light

The Project is located in an urbanized area with existing nighttime lighting from streetlights along Vineland Avenue. Other sources of existing nighttime lighting include nearby commercial and light industrial buildings, parking lots, and East Valley High School facilities. The Project would include nighttime lighting limited to the amount necessary to safely illuminate building entrances, stairs and walkways for adequate night visibility and security. Compliance with LAMC regulatory standards Section 99.05.106 regarding maximum allowable backlight, uplight, and glare, would limit light spillover, including the light pollution reduction standards. Compliance with the City's Green Building Code[8], would require lighting to be directed downward, thereby preventing spillover onto adjacent properties. Although the Project Site is neither zoned residential, nor adjacent to a residentially-zoned property, site Photometric Plans, in Appendix A (Sheet A700), show the light spillover around the Project Site perimeter would be less than a 2.0 foot-candle threshold established in the LAMC.[9] Therefore, light impacts would be less than significant.

Glare

Nighttime glare can occur from car lights, streetlights and other lights on buildings, walkways and parking areas. Daytime glare can result from buildings with glass exteriors or reflective surfaces. As a regulatory requirement, the Department of City Planning will review the material selection of the building exteriors shown on the architectural plans to ensure the exteriors are constructed of materials with high-performance and/or non-reflective tinted glass (no mirror-like tints or films) and pre-cast concrete or fabricated wall surfaces to minimize glare. The trees in the proposed landscape plan would provide additional screening. Vehicle headlights from vehicles on the proposed at-grade parking level would be concealed by the building exterior and landscape improvements around the Project Site perimeter. Therefore, glare impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

[8] Los Angeles Municipal Code, Chapter 9 Building Regulations, Article 9 Green Building Code, Section 99.05.106.8, Light Pollution Reduction.

[9] LAMC, Chapter IX, Building Regulations, Article 3, Electrical Code, Section 93.0117, Outdoor Lighting Affecting Residential Property.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
II. AGRICULTURE AND FORESTRY RESOURCES.				
a. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c. Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d. Would the project result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Would the project involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Impact Analysis

a-e. No Impact. The Project Site is located in an urbanized area within the Community Plan developed and zoned for light manufacturing uses. The Subject Property is not located within designated prime farmland, farmland of statewide or local importance, unique farmland or grazing land on the Los Angeles County Important Farmland map prepared by the California Department of Conservation for the Farmland Mapping and Monitoring Program.[10] The Project Site is currently not used for agricultural purposes. The Project Site is not enrolled in an existing Williamson Act Contract.[11] The Project Site falls within an Urban Agricultural Incentive Zone (UAIZ)[12] in accordance with Assembly Bill (AB) No. 551, where landowners are able to enter into a voluntary contract with the City to utilize closed properties for

[10] California Department of Conservation, Division of Land Resource Protection, Los Angeles County Important Farmland 2016, Accessed February 5, 2020 at: ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/los16.pdf.
[11] California Department of Conservation, Division of Land Resource Protection, State of California Williamson Act Contract Land, 2017.
[12] City of Los Angeles, ZIMAS, Accessed on February 5, 2020 at: http://zimas.lacity.org/.

active agricultural purposes in exchanges for a potential property tax reduction.[13] As the Project does not propose agricultural uses, the UAIZ contract land does not apply. The Project Site is not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, and is not located within a national forest or on forest land. Therefore, the Project would have no impact on agricultural or forestry resources.

Mitigation Measures: No mitigation measures are required.

[13] City of Los Angeles Urban Agriculture Incentive Zone Program, July 2019, Accessed on February 5, 2020 at: https://planning.lacity.org/odocument/8ad42004-12d8-4338-95d4-d6d41434cc13/FAQ.pdf

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
III. 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?	☐	☐	☒	☐

Impact Analysis

The Project lies within the South Coast Air Basin (Air Basin), a 6,600 square mile coastal plain bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto mountains to the north and east. Regional factors collectively hinder the dispersion of air pollutants and contribute towards poor air quality, especially in the Air Basin's inland valleys: low temperature inversion heights, meteorological conditions (e.g. light winds, extensive sunlight, limited turbulent mixing), adjacent mountain ranges and topographical features. The goal of the South Coast Air Quality Management District (SCAQMD) is achieving clean air standards within the Air Basin.

Project-related air quality emission data was obtained using the California Emissions Estimator Model (CalEEMod.2016.3.2). The SCAQMD developed CalEEMod to calculate construction and operational emissions. The model calculates both the daily maximum and annual average emissions for criteria pollutants. The following analysis is based on CalEEMod outputs dated August 7, 2020, provided in **Appendix B**.

a. Less than Significant Impact. A significant air quality impact could occur if a project would conflict with or obstruct the applicable air quality plan, which is the SCAQMD 2016 Air Quality Management Plan (AQMP). The AQMP outlines the integrated air pollution measures needed to meet the National Ambient Air Quality Standards for ozone and particulates. The governing board of the SCAQMD adopted the most recent version of the 2016 AQMP in March 2017.[14] Planning strategies for reducing emissions and achieving ambient air quality standards are developed using demographic growth projections (regional population, housing, and employment) generated by the Southern California Association of Governments.

[14] South Coast Air Quality Management District, Final 2016 Air Quality Management Plan, Mach 2017.

The Project proposes to demolish an existing structure and paved parking lot used for the rental and storage of movie equipment, and redevelop the site with a mixed-use building consisting of self-storage units and offices for artist studios. The Project would be consistent with the North Hollywood-Valley Village Community Plan land use designation of light manufacturing and would not create housing or otherwise lead to substantial population growth in the vicinity. Therefore, the Project would be consistent with regional population growth projections by the Southern California Association of Governments. See Section XI., Land Use and Planning, for further land use plan consistency analysis. The SCAQMD has designated levels for evaluating the significance of air quality impacts under CEQA shown in **Table III-1, Daily Emissions Thresholds**.

Table III-1
Daily Emissions Thresholds

Pollutant	Emissions (lbs/day)	
	Construction	Operations
Reactive Organic Gasses (ROG)	75	55
Nitrogen Oxides (NO_X)	100	55
Carbon Monoxide (CO)	550	550
Respirable Particulate Matter (PM-10)	150	150
Fine Particulate Matter (PM-2.5)	55	55
Sulfur Oxides (SO_X)	150	150
Source: SCAQMD, CEQA Air Quality Handbook, November, 1993 Rev.		

Projects with maximum daily emissions that exceed the thresholds for construction or operations shown in Table III-1 are considered to have a potentially significant air quality impact under CEQA.

Construction Emissions

CalEEMod considered the following Project characteristics in estimating construction emissions. Construction activities would include demolition of an approximately 4,277 SF building and 68,000 SF paved surface parking/storage lot. The Project would consist of one, four-story building over one level of subterranean storage. Project Site grading and excavation would require export of approximately 12,500 CY of soil. The proposed self-storage use would comprise approximately 134,880 SF of floor area and the artist studio offices would comprise approximately 15,120 SF of floor area. Additionally, the Project would include a paved surface parking lot with spaces for 63 vehicles. A detailed list of the construction equipment and duration of each construction phase is provided in Section 3.0 Project Description. **Table III-2**, **Maximum Daily Construction Emissions**, provides the calculated peak daily construction emissions for the Project.

Table III-2
Maximum Daily Construction Emissions

Emissions (lbs/day)						
	ROG	NO_X	CO	SO_2	PM-10	PM-2.5
Construction Emissions[(a)]	69.8	47.2	19.9	0.1	5.1	2.6
SCAQMD Thresholds	75	100	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No

Source: CalEEMod.2016.3.2 Output in Appendix B.
[(a)] Construction emissions estimates reflect required compliance with SCAQMD Rule 403 for reducing construction dust emissions.

The Project would be required to comply with SCAQMD Rule 403, Fugitive Dust. This rule aims to reduce the amount of particulate matter entrained in ambient air as a result of anthropogenic fugitive dust sources. The Project would be required to comply with Rule 403 by applying the best available control measures, including watering the soil during construction, to minimize air pollutants released during the movement of the soil and discontinuing clearing, earth moving, or excavation activities during periods of high winds (i.e., greater than 15 miles per hour), to prevent excessive dust.

As shown in Table III-2, peak daily construction activity emissions would be well below SCAQMD thresholds. Given the results of the analysis and compliance with regulatory requirements, the air quality impact during construction would be less than significant.

Operational Emissions

Operational Project emissions would include mobile source emissions from vehicle use and stationary source emissions from building components. Project maximum daily operational emissions are shown in **Table III-3, Maximum Daily Operational Emissions**.

Table III-3
Maximum Daily Operational Emissions

Emissions (lbs./day)						
	ROG	**NO_X**	**CO**	**SO_2**	**PM-10**	**PM-2.5**
Operational Emissions	4	3.3	9.6	< 0.1	2.9	0.8
SCAQMD Thresholds	55	55	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No
Source: CalEEMod.2016.3.2 Output in Appendix B.						

As shown in Table III-3, operational peak daily emissions would be well below SCAQMD thresholds. Therefore, the Project would not substantially affect conformance with the AQMP or obstruct its implementation, the operational air quality impact of the Project would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact. A significant impact may occur if a project adds a considerable cumulative contribution to federal or state nonattainment pollutants. As the Air Basin is currently in nonattainment for ozone and $PM_{2.5}$, development could exceed an air quality standard or contribute to a deterioration in existing or projected air quality. To determine the significance of the Project's incremental contribution to cumulative air quality emissions, the SCAQMD recommends assessment of a project's potential contribution to cumulative impacts using the same significance criteria used for project-specific impacts. If an individual project's construction or operational emissions would be less than significant, then an individual project would not generate a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is in nonattainment. Based on the Project emissions reported in Tables III-2 and III-3, the Project's construction and operational emissions would be below SCAQMD thresholds. Therefore, the Project would not generate a cumulatively considerable increase in emissions for those pollutants for which Air Basin is in nonattainment; the Project impact would be less than significant.

Mitigation Measures: No mitigation measures are required.

c. Less than Significant Impact. A significant impact may occur if a project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors. Sensitive receptors are populations more susceptible to the effects of air pollution than the population at large. Land uses considered sensitive receptors include residences, long-term care facilities, schools, playgrounds, parks, hospitals, and outdoor athletic facilities. The closest sensitive receptor in the Project vicinity is a high school and associated athletic fields, located on the west side of Vineland Avenue, approximately 114.8 feet (35 meters) the west of the Project Site boundary.

Localized Significance Thresholds

Localized Significance Thresholds (LST) were developed in response to the SCAQMD Governing Board's Environmental Justice Enhancement Initiative I-4 and are only applicable for certain criteria pollutants: oxides of nitrogen (NO_X), carbon monoxide (CO), and particulate matter (PM-10 and PM-2.5). SCAQMD states the use of LSTs is voluntary, to be implemented at the discretion of local public agencies acting as a lead agency. This analysis considers construction emissions to evaluate potential impacts to sensitive receptors.

To determine if a project's maximum daily emissions may have a significant effect on nearby sensitive receptors, the SCAQMD provides LST screening thresholds for sites of 1-, 2-, and 5-acres, at various distances from potentially affected receptors. For this Project, LST impacts were evaluated based on the most stringent screening thresholds for the east San Fernando Valley for a one-acre site with a distance of 82 feet (25 meters) from the nearest sensitive receptor. The Project's estimated daily maximum on-site emissions of CO, NO_X, PM-10, and PM-2.5 generated during temporary construction activities, and the relevant LST screening levels, are listed in **Table III-4, Localized Significance Thresholds and Maximum On-site Construction Emissions**.

Table III-4
Localized Significance Thresholds and Maximum On-site Construction Emissions

LST 1 acre/25 meters E. San Fernando Valley [a]	Project Emissions (pounds/day)			
	CO	NO_X	PM_{10}	$PM_{2.5}$
Max. On-Site Emissions[(a)]	19.7	14.5	3.0	2.0
LST Threshold[(b)]	498	80	4	3
Exceeds Threshold?	No	No	No	No

Source: CalEEMod.2016.3.2 Output in Appendix B.

[a] Onsite construction emissions estimates reflect required regulatory compliance with SCAQMD regulations (Rule 403) for reducing construction dust emissions.

[b] From LST Methodology Appendix C-1 - Mass Rate LST Look-up Tables, Accessed on January 21, 2020, at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf?sfvrsn=2.

As shown in Table III-4, daily onsite construction emissions resulting from the Project would not exceed LST thresholds; therefore, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

d. Less than Significant Impact. A significant impact may occur if a project would result in other emissions, such as those leading to odors, adversely affecting a substantial number of people. Odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum, and strong-smelling materials used in manufacturing, as well as some sewage treatment facilities and landfills. The Project involves no components related to these types of activities. Construction activities, such as

paving and architectural coating, may produce discernible odors typical of most construction sites. Such odors would be temporary, based on the duration of those construction phases. Any associated odors from operations, would not substantially vary from the existing uses on the Project Site, as the Project would replace an existing storage lot and building with indoor self-storage and artist studio offices. Therefore, Project operations would not generate substantial objectionable odors; impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES. Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the City or regional plans, policies, regulations by the California Department of Fish and Game 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?	☐	☐	☐	☒

Impact Analysis

a. Less than Significant Impact. A significant impact may occur if a project would result in a substantial adverse effect on any species identified as a candidate, sensitive or special-status species in local or regional plans. The Project Site is located within in the North Hollywood area of the City, which has been previously developed and designated for Light Manufacturing uses. The Project Site consists of existing buildings and concrete hardscape on urban/disturbed or built-up land.

Records of documented occurrences of State or Federal endangered species identified in the Endangered Species Acts, as well as certain species of special concern designated by the California Department of

Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS), have been inventoried in the California Natural Diversity Database (CNDDB), which is maintained by the CDFW. The CNDDB was queried for nine U.S. Geological Survey (USGS) 7.3-minute quadrangle regions containing and surrounding the Project Site.[15] The CNDDB, as well as California Native Plant Society (CNPS), literature search results are provided in **Appendix C**. The Project Site does not provide habitat for any of the species identified in the query results, no substantial adverse effect on any species is anticipated. Given the existing condition of the Project Site, the Project is not expected to have an impact on candidate, sensitive, or special-status species identified in local or regional plans, policies, or regulations by the CDFW or USFWS.

The Project would remove three non-protected eucalyptus trees from the Project Site.[16] The three non-protected trees would be replaced on-site with three additional trees of a new variety. Site perimeter landscaping would include the London plane tree (*Plantanus wrightii*), live oak tree (*Quercus virginiana*), brake light red yucca (*Hesperaloe perpa*), orange jubilee (*Tecoma 'orange jubilee'*), twin flowered agave (*Agave gemniflora*), yellow dot (*Wedelia trilobata*), and India hawthorne (*Raphiolepsis indica*).[17] The proposed landscape plan would be reviewed and approved by the Department of City Planning during the plan check process prior to issuance of a building permit.

Ground and vegetation disturbing activities, if conducted during the nesting bird season (February 1 to August 31), have the potential to result in removal or disturbance to vegetation that could contain active bird nests. Nesting birds may be disturbed by Project-related noise, lighting, dust, and human activities, which could result in nesting failure and the loss of eggs or nestlings. Project activities resulting in the loss of bird nests, eggs, and young, could violate the California Fish and Game Code.[18] In addition, removal or destruction of one or more active nests of any other birds listed by the federal Migratory Bird Treaty Act (MBTA) of 1918, whether nest damage was due to vegetation removal or to other construction activities, could violate the MBTA and California Fish and Game Code Section 3511. The loss of protected bird nests, eggs, or young due to construction activities would be a potentially significant impact. As a requirement of the MBTA, regulatory compliance measure **4-1**, requires nesting bird surveys, if construction activities cannot feasibly avoid the breeding bird season, to assure impacts are less than significant.

Regulatory Compliance Measure:

4-1 Habitat Modification (Nesting Native Birds, Non-Hillside or Urban Areas)

Project construction will result in the removal of non-protected tree species from the Project Site and therefore may result in take of nesting native birds. 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). California Fish and Game Code Sections 3503, 3503.5 and 3513 \ prohibit take of all birds and their active nests including raptors and other migratory non-game birds (as listed under the Federal MBTA).

- Project construction activities (including disturbances to native and non-native vegetation, structures and substrates) should take place outside of the breeding bird

[15] USGS 7.3-minute quadrangle regions: San Fernando, Sunland, Condor Peak, Van Nuys, Burbank, Pasadena, Beverly Hills, Hollywood, Los Angeles.
[16] Tim McQueen, President, T.J. McQueen & Associates, Inc., Email correspondence with Envicom Corporation, March 20, 2020.
[17] T.J. McQueen & Associates, Inc., Conceptual Landscape Plan, Sheet La.01, October 3, 2019.
[18] California Fish and Game Code Sections 3503 (any bird nest), 3503.5 (birds-of-prey), or 3511 (Fully Protected birds).

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 construction activities cannot feasibly avoid the breeding bird season, beginning thirty days prior to the disturbance of suitable nesting habitat, the applicant shall:
  a. Arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within properties adjacent to the Project Site, 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.
  b. 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 until August 31.
  c. Alternatively, the Qualified Biologist could continue the surveys to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest 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.
  d. 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. No Impact. A significant impact may occur if a project would have a significant adverse effect on any sensitive natural communities identified in local or regional plans, policies, regulations or by CDFW or USFWS. Significant Ecological Areas (SEAs) are habitats designated by Los Angeles County for the promotion of biodiversity and contain irreplaceable biological resources. For SEAs, policies are established to conserve genetic and physical diversity by designating biological resource areas capable of sustaining themselves into the future. The Project is not located within a Los Angeles County designated SEA.[19] The Project Site and surrounding properties are located within a previously developed and urbanized area. The Project Site does not include any natural communities such as riparian habitat, coastal sage scrub, oak woodlands, or wetlands. Therefore, the Project would have no impact on sensitive natural communities.

Mitigation Measures: No mitigation measures are required.

c. No Impact. A significant impact may occur if a project has a substantial adverse effect on federally protected wetlands or waters of the United States. According to the USFWS National Wetlands Mapper, no natural wetlands are located within the Project Site.[20] As the Project Site is urbanized and not

[19] County of Los Angeles, Department of Regional Planning, General Plan 2035, Figure 9.3, Significant Ecological Areas and Coastal Resource Areas Policy Map, Adopted October 6, 2015.

[20] U.S. Fish and Wildlife Service, National Wetlands Inventory, Surface Water and Wetlands, Accessed on March 5, 2020 at: https://www.fws.gov/wetlands/data/mapper.HTML.

located within any natural wetlands marshes, vernal pools, or waters of the United States, the Project would not remove or otherwise impair such areas and would therefore result in no impact.

Mitigation Measures: No mitigation measures are required.

d. No Impact. A significant impact may occur if a project would substantially interfere with the movement of any native resident or migratory fish or wildlife species with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. A wildlife corridor contains physical connections that allow wildlife to move between areas of suitable habitat in both undisturbed landscapes or landscapes fragmented by urban development. The urbanized Project Site is not within an area identified as important to wildlife movement, such as a regional-scale habitat linkage or a wildlife movement corridor.[21] As the Project Site is not located within a wildlife corridor, the Project would not substantially interfere with migratory corridors or impede wildlife movement and would have no impact.

Mitigation Measures: No mitigation measures are required.

e. No Impact. A significant adverse effect could occur if a project were to cause an impact that is inconsistent with local regulations pertaining to biological resources, such as the City Protected Tree Ordinance ("Tree Ordinance").[22] The Tree Ordinance regulates tree protections, removal permitting, and replacements as applicable. The Tree Ordinance defines a Protected Tree as valley oak (*Quercus lobata*) and California live oak (*Quercus agrifolia*), or any other tree of the oak genus indigenous to California but excluding the scrub oak (*Quercus dumosa*), southern California black walnut (*Juglans californica var. californica*), western sycamore (*Platanus racemosa*), and California bay (*Umbellularia californica*) that measures four (4) inches or more in cumulative diameter, four and one-half feet (54 inches) above the ground level at the base of the tree.[23]

The Project would remove three non-protected eucalyptus trees from the Project Site and replace them with new tree varieties on-site. The three non-protected trees are not located in the City right-of-way along Vineland Avenue or Cleon Avenue and are not protected by the City Tree Ordinance. Given there are no protected trees located on-site, there would be no impact regarding conflicts with regard to the City Tree Ordinance.

f. No Impact. A significant impact would occur if a project would be inconsistent with mapping or policies of an adopted or approved conservation plan. The Project Site is not located within an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or State habitat conservation plan. Therefore, the Project would have no impact.

Mitigation Measures: No mitigation measures are required.

[21] County of Los Angeles, Department of Regional Planning, General Plan 2035, Figure 9.2, Regional Habitat Linkages, Adopted October 6, 2015.
[22] City of Los Angeles, Los Angeles Tree Ordinance (No. 177404), LAMC, sec. 12.21.
[23] LAMC, sec. 17.02 et. eq.

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

Impact Analysis

This analysis is based on a Phase I Cultural Resource Assessment prepared by Envicom Corporation dated January 17, 2020, provided in **Appendix D**. The Phase I Cultural Resource Assessment included a record search from the South Central Coastal Information Center (SCCIC) and California Native American Heritage Commission (NAHC), a review of historic maps and aerial images, and a pedestrian survey of the Subject Property.

a. Potentially Significant Unless Mitigation Incorporated. A project would have a significant impact if it would cause a substantial adverse change in the significance of a historical resource as defined in CEQA Section 15064.5. The Phase I Cultural Resource Assessment involved a SCCIC record search of the subject property plus a 0.5-mile radius surrounding the Subject Property ("study area"). The results of the SCCIC record search found no previously identified cultural resources within the Project Site, however, three historic built environment cultural resources were located within the surrounding 0.5-mile Study Area. There are three historic built environment resources in the area – El Portal theatre, a commercial building, and a Southern Pacific railroad depot – not located on or adjacent to the Subject Property. The results of the NAHC record searches were negative for cultural resources within the study area. In addition, the Project Site is not listed in the National Register of Historic Places or the California Register of Historical Resources as defined in Public Resources Code section 5020.1(k) or SurveyLA. The Project Site is not located within, or designated as, a Historic Cultural Monument, a historic district, or other historic overlay zone.[24]

Examination of USGS maps, aerial images, and satellite images indicated that the Subject Property could contain subsurface cultural resources dating to prior to the 1940s. Therefore, the Project is located within an area the Phase I Cultural Resource Assessment considered sensitive for potentially-present cultural resources. Mitigation measures are provided to reduce the impact of ground-disturbing activities on any potentially-present cultural resources. Mitigation measure **5-1** requires archaeological monitoring, during removal of asphalt and above-ground structures and grading to bedrock, and mitigation measure **5-2** establishes a discovery protocol if potentially significant intact deposits are encountered during

[24] SurveyLA, Historic Resources Survey Report, North Hollywood-Valley Village Community Plan Area, February 26, 2013, Accessed on February 10, 2020 at: https://planning.lacity.org/odocument/c423999b-e386-40d3-abe3-325022c47fce/NHL_Report_Final_2.26.13.pdf.

excavation. Implementation of Mitigation Measures 5-1 and 5-2 would reduce impacts on potentially present cultural resources to less than significant.

Mitigation Measures:

5-1 Archaeological Monitoring

To reduce the impact of ground-disturbing activities on any potentially present cultural resources, an archaeological monitor that meets the Secretary of Interior's professional qualification standards shall monitor asphalt removal, above ground structure removal, and ground-disturbing activities from surface to bedrock. The purpose of having an archaeologist on site is to assess if any significant cultural resources are encountered during ground-disturbing activities. If such features are identified, then the "discovery" protocol will be followed.

The archaeological monitor shall collect any diagnostic historic material uncovered through grading within a disturbed context, and can halt construction within 50-feet of a potentially significant cultural resource if necessary. Artifacts collected from a disturbed context or that do not warrant additional assessment can be collected without the need to halt grading. Discovery situations that do not lead to further assessment, survey, evaluation, or data recovery can be described in the monitor's daily Monitoring Report. However, if foundations, privies, or other older historic features are encountered, the "discovery" protocol shall be followed.

A final Monitoring Report will be produced that discusses all monitoring activities and all artifacts recovered and features identified through monitoring the demolition and ground-disturbing activities on the Project Site. Discovery situations that do not lead to further assessment, survey, evaluation, or data recovery can be described in the final Monitoring Report.

All artifacts recovered that are important, with diagnostic or location information that may be of importance to California and Los Angeles City history, will be cleaned, analyzed, and described within the Monitoring Report. All materials determined important shall be curated at an appropriate depository or returned to the Applicant or Project Proponent for public display. If important materials are found during monitoring, a Curation Plan may be required for review by the Lead Agency prior to the publication of the Monitoring Report. The costs of the Monitoring Report, Curation Plan, and any processing, analysis, and curation of all artifacts shall be the responsibility of the applicant, within the cost parameters outlined under the California Environmental Quality Act.

5-2 Archaeological Discovery Protocol

The following "discovery" protocol shall be followed if potentially significant intact deposits are encountered within an undisturbed context during ground-disturbing activities. If older historic (or prehistoric) features, artifact concentrations, or larger significant artifacts are encountered during demolition or ground-disturbing activities within native soils or original context, then all work in that area shall be halted or diverted away from the discovery to a distance of 50-feet until a qualified senior archaeologist can evaluate the nature and/or significance of the find(s). If the senior

archaeologist (not the field monitor) confirms that the discovery is potentially significant, then the Lead Agency will be contacted and informed of the discovery.

Construction will not resume in the locality of the discovery until consultation between the senior archaeologist, the Applicant or Project Proponent's Project Manager, the Lead Agency, and all other concerned parties, takes place and reaches a conclusion approved by the Lead Agency. If a significant cultural resource is discovered during earth-moving, complete avoidance of the find is preferred. However, if the discovery cannot be avoided, further survey work, evaluation tasks, or data recovery of the significant resource may be required by the Lead Agency. The Lead Agency may also require changes to site monitoring, based on the discovery.

All costs for the additional monitoring, discovery assessment, discovery evaluation, or data recovery shall be the responsibility of the applicant, within the cost parameters outlined under the California Environmental Quality Act. All individual reports, including the final Monitoring Report, will be submitted to the South Central Coastal Information Center at the conclusion of the Project.

b. Potentially Significant Unless Mitigation Incorporated. A significant impact would occur if a known or unknown archaeological resource would be removed, altered, or destroyed as a result of the proposed development. Section 15064.5 of the CEQA Guidelines defines criteria for determining the significance of cultural resources. The records search results from the SCCIC identified no previously identified cultural resources within the Subject Property. However, the Phase I Cultural Resource Assessment considered the Subject Property sensitive for older cultural resources based on an examination of USGS maps, satellite image database, and aerial photo databases, which showed evidence of development prior to the 1940s. The results from the NAHC record search were received on January 10, 2020 with negative findings. Further cultural resource assessment prior to construction for archaeological resources is not necessary due to the Subject Property being fully paved.

In accordance with the federal, State, and local guidelines, including those set forth in the California Public Resources Code (PRC) Section 21083.2, if unknown archaeological resources are discovered during excavation, grading, or construction activities, work shall cease in the area of the find until a qualified archaeologist has evaluated the find. PRC Section 21083.2 prohibits personnel from collecting or moving any archaeological materials and associated materials discovered during excavation, grading, or construction activities. PRC Section 21083.2 requires found deposits to be treated in accordance with federal, State, and local regulations. Mitigation measure 5-1 requires archaeological monitoring and mitigation measure 5-2 establishes a discovery protocol if potentially significant intact deposits are encountered during excavation. Implementation of mitigation measures 5-1 and 5-2 would reduce impacts on potentially present archaeological resources to less than significant.

Mitigation Measures: Mitigation measures 5-1 and 5-2 shall apply.

c. Less than Significant Impact. A significant impact would occur if previously interred human remains would be disturbed during excavation of the Project Site. The results of the SCCIC and NAHC record searches were negative for cultural resources within the Project Site. While no formal cemeteries, other places of human internment, or burial grounds are known to occur within the Project Site, there is a possibility that human remains can be unexpectedly encountered during ground disturbing activities. If human remains are encountered unexpectedly during ground disturbing activities, regulatory requirements specified in State Health and Safety Code Section 7050.5 require that no further disturbance occur until

the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98.[25] If human remains of Native American origin are discovered during construction, compliance with state laws, within the jurisdiction of the NAHC (PRC Section 5097), relating to the disposition of Native American burials must be adhered to. Based on the ground disturbance history of the Project Site, the in-fill location, and the proposed depth of excavation, the inadvertent discovery of human remains is not reasonably expected but remains a possibility during ground disturbances. Regulatory compliance measure **5-3** establishes a discovery protocol for inadvertent discovery of human remains. Implementation of Regulatory compliance measure 5-3 would reduce potential impacts in the event of the inadvertent discovery of human remains to less than significant.

Regulatory Compliance Measure:

5-3 Inadvertent Discovery of Human Remains

The inadvertent discovery of human remains is always a possibility during ground disturbances; State of California Health and Safety Code Section 7050.5 addresses these findings. This code section states that in the event human remains are uncovered, no further disturbance shall occur until the County Coroner has determined the origin and disposition of the remains pursuant to California Public Resources Code Section 5097.98. The Coroner must be notified of the find immediately, together with the City and the property owner.

If the human remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission (NAHC), which will determine and notify a Most Likely Descendant (MLD). The MLD shall complete the inspection of the site within 48 hours of notification and may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials and an appropriate re-internment site.

[25] Contact: Los Angeles County, Department of Coroner, 1104 N. Mission Road, Los Angeles, CA 90033. 323-343-0512 (8am-5pm, Monday -Friday) 323-343-0714 (After hours, Saturday, Sunday, and Holidays).

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
VI. 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?	☐	☐	☒	☐

Impact Analysis

The following analysis is based on the CalEEMod output sheets dated August 7, 2020, and Fuel Consumption by Construction Phase Worksheet provided in **Appendix B**.

a. Less than Significant Impact. A significant impact would occur if a project would result in wasteful, inefficient, or unnecessary consumption of energy resources during construction or operation.

Construction

During construction, the Project would use heavy-duty equipment for demolition, grading, paving, architectural coating, and building. Construction also involves trucks for material and supplies delivery, as well as powered hand tools. The majority of the equipment would likely be diesel-fueled. Smaller equipment, such as welders and pumps, may be electric-, gasoline-, or natural gas-fueled, and tower cranes would likely be electric. The California Code of Regulations (CCR), requires drivers of diesel-fueled commercial motor vehicles with gross vehicle weight ratings greater than 10,000 pounds not to idle the vehicle's primary diesel engine longer than five minutes at any location.[26] Compliance with this regulation would also result in efficient use of construction-related energy and prevent unnecessary consumption of energy from diesel fuel.

According to carbon dioxide (CO_2) emission factors for transportation fuels published by the U.S. Energy Information Administration, burning one gallon of diesel fuel generates approximately 22.4 pounds of CO_2 and burning one gallon of petroleum-based gasoline produces approximately 19.6 pounds of CO_2.[27] Based on these emissions factors and total Project construction-related CO_2 emissions, Project consumption of diesel and petroleum-based gasoline during construction is shown in **Table VI-1, Fuel Consumption During Construction**. The calculations are shown in a Construction Fuel Consumption Worksheet provided in Appendix B following the CalEEMod output sheets.

[26] California Code of Regulations, Section 2485, Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling.
[27] U.S. Energy Information Administration, Environment Carbon Dioxide Emissions Coefficients, February 2, 2016.

Table VI-1
Fuel Consumption During Construction

Energy Type	Total MT CO_2	Total CO_2 pounds [a]	CO_2 emission factors	Total Gallons Consumed
Total Diesel	365.62	806,054	22.4	**35,985**
Total Gasoline	76.45	168,543	19.6	**8,599**

Source: CalEEMod, Vineland and Cleon Fuel Consumption by Construction Phase Worksheet, Appendix B.
[a] 1 MT = 2,204.62 lbs. (approx.)

As shown in Table VI-1, based on U.S. Energy Information Administration fuel consumption factors and the estimated "total CO_2" emissions from the CalEEMod output sheets, Project construction would consume a total of approximately 35,985 gallons of diesel fuel and approximately 8,599 gallons of gasoline. In 2015, 15.1 billion gallons of gasoline were sold in California,[28] and 4.2 billion gallons of diesel, including off-road diesel, was sold in California.[29] As such, the use of construction equipment, transportation of materials, and workers necessary for Project construction would not represent a substantial proportion of annual gasoline or diesel fuel use in California.

Adherence to CCR Section 2485 and California Air Resources Board anti-idling regulations for off-road diesel-fueled fleets would reduce the potential for wasteful use of energy by construction equipment. Due to the temporary duration of construction and the necessity of fuel consumption inherent in construction, fuel consumption would not be excessive or substantial with respect to fuel supplies. The energy demands associated with fuel consumption during construction is typical for developments of similar size and would not necessitate additional energy facilities or distribution infrastructure. Therefore, as Project construction would not result in wasteful, inefficient, or unnecessary consumption of energy resources, impacts would be less than significant.

Operations – Electricity

The Project would generate additional demand for electricity from the Los Angeles Department of Water and Power. As estimated by CalEEMod, the proposed Project's total electricity demand would be approximately 729,215 kilowatt-hour a year (kWh/year) or 729.2 megawatt-hours a year (MWh/year). The Los Angeles Department of Water and Power supplies more than 24 million MWh/year of electricity to the City's residential and business customers.[30] The Project would replace an existing use within the Los Angeles Department of Water and Power service area and represent approximately 0.003 percent of the yearly electricity demand, a negligible increase in relation to the entire City's electricity demand. Therefore, the Project would not result in a significant environmental impact resulting from the increase in electricity demand.

In addition, the Project would be required to comply with applicable portions of the California Energy Code and California Green Building Standards Code (Title 24 of the California Code of Regulations) in effect at the time of building permit issuance, which establish standards for sustainable site development, energy efficiency, water conservation, and material conservation. The Los Angeles Department of Water and Power has increased renewable energy through active procurement of renewable resources included

[28] California Energy Commission, California Gasoline Data, Facts, and Statistics, Accessed March 4, 2020 at: https://ww2.energy.ca.gov/almanac/transportation_data/gasoline/.
[29] California Energy Commission, Diesel Fuel Data, Facts, and Statistics, Accessed March 4, 2020 at: https://ww2.energy.ca.gov/almanac/transportation_data/diesel.html.
[30] LADWP, Power Today, Accessed on March 4, 2020 at: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-pastandpresent/a-p-pp-powertoday?_adf.ctrl-state=193qichyuu_4&_afrLoop=1595016012439636.

in the Renewable Portfolio Standard[31] and the Strategic Long-Term Resource Planning,[32] which specifies a roadmap for providing reliable and sustainable electricity use to customers through 2050. The Project would be designed to meet or exceed all City Building Code and Title 24 requirements and incorporate eco-friendly building materials, systems, fixtures wherever feasible, including Energy Star appliances. As a design feature, the Project would install the solar panels at the time of construction.[33] Through project design features, compliance with applicable regulations, and continued energy efficient programs implemented by the Los Angeles Department of Water and Power, the Project would not result in wasteful or inefficient use of electricity energy supplies and impacts would be less than significant.

Operations - Natural Gas

The Project would generate additional demand for natural gas from the Southern California Gas Company (SoCalGas). Total Project demand for natural gas would be approximately 274,101 kilo British-thermal unit per year (KBTU/year) as estimated by CalEEMod outputs in Appendix B. According to the California Energy Commission, Los Angeles County consumed 2,921.4 million therms or 292,030,272,740 KBTU/year of natural gas in 2018.[34] Project demand represents approximately 0.00009 percent of the natural gas consumption in Los Angeles County in 2018, a negligible amount relative to Countywide consumption. In addition, the Project is required to comply with applicable portions of the California Energy Code and California Green Building Standards Code, which sets standards for sustainable site development, energy efficiency, water conservation, and material conservation. By requiring compliance with applicable regulations, the Project would not result in wasteful or inefficient use of natural gas energy supplies, and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact. A significant impact may occur if a project would conflict with or obstruct a state or local plan for renewable energy or energy efficiency. The local plan for renewable energy is the 2019 Sustainable City Plan or L.A.'s Green New Deal (Green LA). The energy focus areas of Green LA indicates a need to increase Los Angeles Department of Water and Power energy production from renewables, biogas, and natural gas, and reduce energy imports from coal-fired plants, prepare a set of green building policies to guide private sector development,[35] reduce energy use in City buildings and facilities, and incentivize public use of energy efficient lighting and appliances. Green LA focus areas regarding water, transportation, land use, and waste, generally indicate a need to increase water conservation and reduce per capita water consumption by 20 percent, convert City fleets to alternative fuel use and promote transit use and walking/biking, promote high-density housing near transportation arteries and transit stations, and increase recycling. Green LA's focus areas for port and airport operations, parks/open space, green economic sector promotion, and adaptation/response to climate-related emergencies are specific to uses in those locations/sectors, and as such, are unrelated to the Project.

As a regulatory requirement of the City Department of Building and Safety review process, the Project would be reviewed for consistency with applicable state and local plans for renewable energy and

[31] LADWP, Power Today, Sustainability, Accessed on March 4, 2020 at: ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-pastandpresent/a-p-pp-powertoday?_adf.ctrl-state=193qichyuu_4&_afrLoop=1596243708636711

[32] LADWP, Power Strategic Long Term Resource Plan, December 2017.

[33] Jessi Thornton, Nimble Consulting, LLC, email correspondence with Envicom Corporation, October 5, 2020.

[34] California Energy Commission, Gas Consumption by County, Los Angeles County in 2018, Accessed on March 4, 2020 at: https://ecdms.energy.ca.gov/gasbycounty.aspx.

[35] The Los Angeles Green Building Standards Code is based on the California Green Building Standards Code that was developed and mandated by the State to attain consistency among the various jurisdictions within the State, reduce the building's energy and water use, reduce waste, and reduce the carbon footprint.

efficiency. The LAMC incorporates the CALGreen Code Title 24 standards. CALGreen Code standards require projects to provide energy saving features, establish minimum standards for energy efficient construction practices, and increased energy efficiency. The Project would be built to the code standards in effect at the time of permit issuance. Because the Project would replace an existing building, newer and more stringent codes would be required. In addition, the Project would incorporate design features including short-term and long-term bicycle parking to encourage active transportation, eco-friendly building materials, systems, and features wherever feasible, including Energy Star appliances, water saving/low flow fixtures, non-Volatile Organic Compound (VOC) paints/adhesives, drought tolerant planting and a high performance building envelope to ensure the Project would not result in a wasteful, inefficient, or unnecessary consumption of energy resources. As the Project would comply with regulatory requirements and consist of energy efficient design features, 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.

Mitigation Measures: No mitigation measures are required.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
VII. 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 geological features?	☐	☒	☐	☐

Impact Analysis

The following analysis is based on the Geotechnical Engineering Report (Geotechnical Report) by Terracon Consultants, Inc., dated August 14, 2019, and provided in **Appendix E**.

a. i. Less than Significant Impact. A significant impact may occur if a project would directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. The Project Site is not located in a state-designated Alquist-Priolo Earthquake Fault Zone or a City-designated Preliminary Fault Rupture Study Area for surface fault rupture hazards.[36] Therefore, the potential for surface rupture due to faulting is low. The nearest active fault is the Hollywood Fault, located approximately 4.4 miles from the Project Site.[37] As the potential for surface rupture of a known earthquake fault is low, the Project would have a less than significant impact.

Mitigation Measures: No mitigation measures are required.

a. ii. Less than Significant Impact. A significant impact may occur if a project would directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving strong seismic ground shaking. As with all of southern California, the Project Site is in a seismically active area, has experienced previous earthquakes from regional faults, and may be subject to strong ground shaking during seismic activity. The Project is located approximately four miles from the Hollywood Fault within the Transverse Ranges and Los Angeles Basin.[38] Hazards associated with ground-shaking can be reduced by designing and constructing the Project in conformance with building code standards and recommended engineering practices. Compliance with the City Department of Building and Safety plan check process and regulatory compliance measure **7-1** would ensure the Project incorporates the recommendations in the Geotechnical Report into final site plans, ensuring potential seismic ground shaking impacts are less than significant.

Regulatory Compliance Measure:

7-1 Geology and Soils

Prior to the issuance of a grading or building permit, the Applicant shall incorporate the recommendations in the Geotechnical Report dated August 14, 2019, revised July 24, 2020, prepared by Terracon Consultants, Inc. into final site plans to the satisfaction of the City Department of Building and Safety. The recommendations of more recent reports or addenda shall supersede if recommendations for the same project are provided in updated reports or addenda. Recommendations from a Soils Report Approval Letter from the Department of Building and Safety shall be incorporated as applicable into final project plans to the satisfaction of the Department of Building and Safety.

a. iii. Less than Significant Impact. A significant impact may occur if a project would directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving seismic-related ground failure, including liquefaction. Liquefaction is a mode of ground failure that results from the generation of high pore water pressures released during earthquake ground shaking, causing loss of shear strength. Liquefaction is typically a hazard where loose sandy soils exist below groundwater. The Project Site is located within a liquefaction zone.[39] Terracon performed a liquefaction analysis according to California Department of Conservation, Division of Mines and Geology (DMG) Special Publication 117 and City criteria. Subsurface soils encountered at the Project Site consisted of

[36] City of Los Angeles, ZIMAS, Accessed on February 25, 2020 at: http://zimas.lacity.org/.
[37] Terracon GeoReport, Revised Geotechnical Engineering Report, July 24, 2020, page 5.
[38] City of Los Angeles, ZIMAS, Accessed on February 25, 2020 at: http://zimas.lacity.org/.
[39] City of Los Angeles, ZIMAS, Accessed February 25, 2020 at: http://zimas.lacity.org/.

loose to very dense sands with varying amounts of silt to an approximate depth of 71 feet below grade. Groundwater was not encountered at the time of drilling. Based on nearby well data, the highest groundwater depth reported in the vicinity of the Project Site is greater than 100 feet below ground surface. Due to the depth to historical high groundwater, liquefaction potential at the Project Site is low. The City Department of Building and Safety would review the Project through the plan check process to ensure compliance with applicable Building Code requirements for seismic safety. Regulatory compliance measure 7-1 requires the recommendations within the Geotechnical Report to be incorporated into final site plans. Therefore, impacts to seismic-related ground failure including liquefaction would be less than significant.

Mitigation Measures: No mitigation measures are required.

a. iv. No Impact. A significant impact may occur if a project would directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving landslides. The Project Site is relatively level, and is not located within a hillside or landslide area.[40] There are no known landslides near the site, nor is the Project Site in the path of any known or potential landslides. The topography at the Project Site is relatively level and the Project Site is not adjacent to any steeply sloping areas. Therefore, the Project would have no impact related to landslides.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact. A significant impact may occur if a project would result in substantial soil erosion or the loss of topsoil. During construction, the Project would be required to implement erosion and sediment control Best Management Practices (BMPs) to prevent erosion and sediment loss and the discharge of construction wastes to prevent erosion and sedimentation.[41] Standard BMPs for construction sites include, but are not limited to, erosion and sediment controls such as scheduling, silt fencing, sandbags, and straw wattles to eliminate the water quality problems associated with sedimentation from stormwater runoff. Compliance with regulatory requirements would reduce impacts during construction to a less than significant level.

During operations, the Project would be required to comply with the City Low Impact Development (LID) Ordinance (Ordinance No. 181899). The LID Ordinance requires reducing erosion and sedimentation during operations through a set of site design approaches and BMPs to address runoff and pollution at the source. Given the urban setting, most of the Project Site would be paved, thus reducing erosion potential. Stormwater would be collected into a dry well system for treatment and infiltration, overflows would exit the Project Site through sheet flow to existing street gutters in accordance with LID Ordinance requirements. The existing drainage pattern would be maintained while treating the stormwater as well as decreasing the stormwater volumes and flows exiting the Project Site.[42] Therefore, erosion impacts during operations would be less than significant.

Mitigation Measures: No mitigation measures are required.

[40] City of Los Angeles, ZIMAS, accessed September 18, 2019 at: http://zimas.lacity.org/.
[41] LAMC, Chapter 6, Public Works and Property, Article 1, Section 61.02. Abatement of Erosion or Flood Hazard.
[42] Robert J. DePrat, P.E., President/CEO, Blue Peak Engineering, Inc., Email correspondence with Envicom Corporation, February 12, 2020.

c. Less than Significant Impact. A significant impact may occur if a project is built on a geologic unit or soil that is unstable, or that would become unstable, as a result of a project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.

The topography of the Project Site and vicinity is relatively level. There are no known landslides near the Project Site. Therefore, the potential for slope stability hazards to adversely affect the Project is low. Lateral spreading usually occurs along the weak shear zones within a liquefiable soil layer and has been observed where free face topography (i.e., channels, rivers, slopes, etc.) is in the vicinity of a site. As there are no free face topographical features located near the Project Site and no liquefiable layers within the upper 50 feet of the soil, lateral spreading potential is considered negligible and unlikely to occur.[43]

Subsidence, a vertical displacement or sinking of land, occurs due to the withdrawal of groundwater, oil, or natural gas. As stated, the Project is located within a liquefaction hazard zone. Terracon Consultants performed a liquefaction analysis in accordance with DMG Special Publication 117 and City criteria. Although liquefiable soils were not encountered within the upper 50 feet of soil, the analysis indicated total seismically induced settlement of dry sands on the order of two to 26 inches. Based on this, the estimated subsidence would occur during a significant seismic event, significant subsidence during typical, static conditions is not anticipated.[44] Provided the Project complies with all applicable LAMC requirements and the Geotechnical Report recommendations, as required by mitigation measure 7-1, the Project Site would be suitable based upon geotechnical conditions encountered in the test borings. Therefore, subsidence impacts would be less than significant with mitigation incorporated.

The Project Site is located within a liquefaction zone; however, the liquefaction potential is low due to the depth to groundwater. Regulatory Compliance Measure 7-1 requires the Project to implement the recommendations within the Geotechnical Report by to ensure the Project is built on soils that are sufficiently stable to support the load proposed by the Project. Therefore, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

d. Less than Significant Impact. A significant impact may occur if a project is located on expansive soil, creating substantial direct or indirect risks to life or property. Expansive soils contain high amounts of clay particles that swell when wet and shrink when dry. Foundations constructed on expansive soils are subject to uplift caused by the swelling. The Geotechnical Report investigated samples from four borings taken at depths of three to 71 feet below existing grade and two cone penetration test soundings at depths of 45 feet below grade. Fills and native soils at the site consist of:

- Silty sand at 5 feet below grade,
- Poorly graded sand with varying amounts of silt at 35 feet below grade,
- Silty sand at 40 to 45 feet below grade,
- Poorly graded sand with varying amounts of silt and clay at 65 to 68.5 feet below grade, and
- Poorly graded sand with gravel at 71 feet below grade.

Based on the subsurface investigation, the on-site sandy soils are generally non-plastic and therefore not expansive. Regulatory compliance measure 7-1 requires incorporation of recommendations within the Geotechnical Report into final Site Plans and recommendations from the City Department of Building

[43] McCranie, Abigail, EIT, Terracon Consultants, Inc., Email Correspondence with Nimble Consulting, LLC on August 7, 2020.
[44] McCranie, Abigail, EIT, Terracon Consultants, Inc., Email Correspondence with Nimble Consulting, LLC on August 7, 2020.

and Safety. Implementation of regulatory compliance measure 7-1 would reduce soil impacts to less than significant.

Mitigation Measures: No mitigation measures are required.

e. No Impact. A significant impact may occur if a site contains soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available. The Project Site is located in a developed area of the City served by an existing wastewater collection, conveyance, and treatment system operated by the Los Angeles Bureau of Sanitation (LA Sanitation). No septic tanks or alternative onsite wastewater disposal systems are proposed for the Project. Therefore, the Project would have no impact.

Mitigation Measures: No mitigation measures are required.

f. Potentially Significant Unless Mitigation Incorporated. Paleontological resources are the fossilized remains of organisms from the geologic past and the accompanying geologic strata. The rock type exposed at the surface can indicate the potential for fossils. The Project Site is situated within the eastern Transverse Range Geomorphic Province in southern California. Geologic structures within the Transverse Ranges Province trend mostly east to west, in contrast to the prevailing northwest trend observed elsewhere in the state. The Transverse Range Province contains the highest peaks composed of pre-Phanerozoic rocks south of the Sierra Nevada, four of the eight islands off the southern California coast, and is both bounded and transected by several major fault zones. Surficial geologic units mapped at the Project Site consist of Quaternary recent alluvium deposits. In assessing the potential for the site to yield paleontological resources during ground disturbance, the Phase I Cultural Resource Assessment requested a record search at the Natural History Museum of Los Angeles County (NHM). The NHM confirmed the Project Site is within areas considered sensitive for paleontological resources and fossil-bearing rock formations and recommended monitoring of substantial extractions of soil, particularly those extending into older Quaternary deposits. Given the Project proposes soil extraction for a basement level, and to reduce impacts to any paleontological resources inadvertently encountered, mitigation measure **7-2** requires paleontological monitoring during ground-disturbing activities that directly impact bedrock. Implementation of mitigation measure 7-2 would reduce impacts to potentially present paleontological resources to less than significant.

Mitigation Measure:

7-2 Paleontological Monitoring

To reduce the impact of ground-disturbing activities on any potentially present paleontological resources, a qualified paleontological monitor shall monitor ground-disturbing activities that directly impact bedrock. The paleontological monitor shall collect any fossil material uncovered through grading that is found within a disturbed context, and shall halt construction within 50-feet of a potentially significant fossil resource as necessary. Fossils collected from a disturbed context, or fossils that do not warrant additional assessment, can be collected without the need to halt grading.

If fossils are encountered that cannot be removed during grading and that the monitor believes need further assessment, then the following "discovery" protocol shall be followed. Discovery situations that do not lead to further assessment, survey, evaluation, or data recovery may be described in the monitor's daily log and final Monitoring Report.

Discovery Protocol: All fossils recovered that may be of importance to California paleontology shall be cleaned, analyzed, and described within a final Monitoring Report. All materials shall be curated at the Natural History Museum of Los Angeles County or placed on public display by the owner. If important fossils are found during monitoring, the monitor shall prepare a Curation Plan for review by the Lead Agency prior to the publication of the Monitoring Report. The costs of the Monitoring Report, Curation Plan, and the processing, analysis, and curation of all fossils will be the responsibility of the Applicant.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
VIII. 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?	☐	☐	☒	☐

Impact Analysis

Greenhouse gases (GHGs) can contribute to an increase in the temperature of the earth's atmosphere by absorbing infrared radiation transmitted by the sun, thereby trapping and retaining heat. The principal GHGs are carbon dioxide, methane, nitrous oxide, ozone, and water vapor. The CEQA Guidelines define the following as GHGs: carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), sulfur hexafluoride (SF_6), perfluorocarbons (PFCs), and hydrofluorocarbons (HFCs).[45]

Each GHG differs in its mass and ability to trap heat within the atmosphere based on factors such as capacity to directly absorb radiation, length of time in the atmosphere, and chemical transformations that create new GHGs. Because the warming potential of each GHG differs, GHG emissions are typically expressed in terms of carbon dioxide equivalents (CO_2e), common expression for the combined volume and warming potential of the GHGs generated by an emitter. Total GHG emissions from individual sources are generally reported in metric tons (MT) and expressed as metric tons of carbon dioxide equivalents ($MTCO_2e$). The following impact analysis is based on the CalEEMod outputs in Appendix B.

a. Less than Significant Impact. A significant impact would occur if the project would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.

Construction

During construction, the operation of equipment, disposal of construction waste, and use of materials (paint, asphalt, etc.) would result in the short-term emission of GHGs. Total construction-related GHG emissions generated over the full duration of the construction period are provided in **Table VIII-1, Construction Greenhouse Gas Emissions**. SCAQMD guidance for GHG emissions analysis for construction recommends the amortization of emissions over a 30-year project lifetime to evaluate significance on an annual basis. Therefore, the amortized amount is also provided.

Table VIII-1
Construction Greenhouse Gas Emissions

	$MTCO_2e$
Total Construction GHG emissions	409
Amortized (over 30-year lifetime span)	14
Source: Annual CalEEMod.2016.3.2 output provided in Appendix B.	

[45] California Code of Regulations, Section 15364.5 Greenhouse Gas, Article 20, Definitions.

As shown in Table VIII-1, total emissions resulting from construction would be 409 $MTCO_2e$ and the 30-year amortized emissions would be 14 $MTCO_2e$. This amortized amount is added to the annual operational period emissions, evaluated below, to determine the Project's annual GHG emissions level of significance.

Operations

Project operations would result in GHG emissions from mobile sources, on-site use of heating, ventilation and air conditioning equipment, and off-site sources such as electricity generation, water distribution and treatment, disposal of solid waste, and wastewater treatment.

The SCAQMD CEQA Significance Thresholds GHG Working Group recommended a threshold of 3,000 $MTCO_2e$ per year for non-industrial land use projects. The SCAQMD has not adopted these screening thresholds and the timeline for adoption is uncertain. For the purpose of analyzing Project GHG emissions, this evaluation uses the proposed 3,000 $MTCO_2e$ per year screening threshold for non-industrial projects as a point of comparison. Total operational emissions, plus the annualized construction emissions, are provided in **Table VIII-2**, **Operational Greenhouse Gas Emissions.**

Table VIII-2
Operational Greenhouse Gas Emissions

Consumption Source	$MTCO_2e$
Area Sources	< 0.1
Energy Utilization	421.7
Mobile Source	519.4
Solid Waste Generation	70.5
Water Consumption	301.0
Annualized Construction	14
Total	**1,326.6**
SCAQMD Recommended Threshold	3,000.00
Source: Annual CalEEMod.2016.3.2 output provided in Appendix B.	

As shown in Table VIII-2, with the addition of amortized construction emissions, the total Project annual GHG emissions would be approximately 1,326.6 $MTCO_2e$. GHG emissions from mobile sources, as shown in Table VIII-2, are a gross total. No "credit" for removing the existing use was considered for the consumption sources shown in the Table VIII-2. As such, total Project operational emissions of GHGs would be somewhat less. Total Project GHG emissions would be less than the threshold of 3,000 $MTCO_2e$; therefore, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact. A project could have a significant impact if it would conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. State Assembly Bill (AB) 32, the Global Warming Solutions Act of 2006, established mandatory provisions and GHG reduction targets within specified time frames, including a requirement that California's GHG emissions be reduced to 1990 levels by 2020. In 2014, the California Air Resources Board (CARB) updated its Scoping Plan, which details strategies to meet that goal. Executive Order S-3-05 aims to reduce statewide GHG emissions to 80 percent below 1990 levels by 2050. In 2015, the City released the Sustainable City pLAn (L.A.'s Green New Deal) with goals such as to reduce GHG emissions by at least 55 percent by 2035 from a 2008 baseline and to eliminate use of coal-fired electricity by 2025.

The local climate action plan for the City is Green LA: An Action Plan to Lead the Nation in Fighting Global Warming (Green LA), adopted in May 2007. Green LA is the City of Los Angeles' Climate Action Plan (CAP). The Green LA CAP sets a goal of reducing GHG emissions to 35% below 1990 levels by 2030 by implementing actions focusing on Energy, Water, Transportation, Land Use, and Waste, as well as actions specific to Port and Airport operations, City Park and Open Space, Green Sector Economy, and Adaptation. Climate LA is the implementation program for the Green LA CAP. Climate LA details action items within the Green LA CAP. To reduce GHG emissions from energy usage, the City's Department of Environmental Protection, Environment LA, proposed the following goals in their Green LA and Climate LA plans: increase the amount of renewable energy provided by the Los Angeles Department of Water and Power to decrease dependence on fossil fuels; present a comprehensive set of green building policies to guide and support private sector development; and reduce energy consumed by City facilities and utilize solar heating where applicable; and help citizens to use less energy.

The SCAQMD CEQA Greenhouse Gas Significance Threshold working group recommended a tiered set of thresholds for Greenhouse Gas significance adopted for projects where SCAQMD is the lead agency. As there are no other locally-adopted thresholds, the recommended tiered thresholds are used. Projects with less than significant impacts with regard to GHG emissions are consistent with approved local or regional plans adopted for the purposes of reducing GHG. Therefore, the Project impact would be less than significant if the Project is consistent with Green LA and Climate LA. CalEEMod quantified the estimated Project GHG emissions in terms of Metric Tons of Carbon Dioxide Equivalent (MTCO2e). Total Project GHG emissions would be approximately 1,004.4 $MTCO_2e$, less than the SCAQMD CEQA Greenhouse Gas Significance Threshold working group threshold of 3,000 $MTCO_2e$. Therefore, the Project would not interfere or conflict with local and regional goals and policies aimed at reducing the generation of GHG emissions, impacts would be less than significant.

The Project would be required to comply with applicable requirements of the Los Angeles Green Building Standards Code, and by extension, the California Green Building Standards Code for efficiency and sustainability, including requirements that reduce GHG emissions associated with energy use, water, and waste. Therefore, the Project would not conflict with, or interfere with the City's ability to implement the CAP (Green LA and Climate LA). In addition to Green LA and Climate LA, the Sustainable Communities and Climate Protection Act of 2008, also known as Senate Bill (SB) 375, aims to reduce the State's GHG emissions through linking transportation and land use planning. SB 375 requires Metropolitan Planning Organizations to prepare a Sustainable Communities Strategy as a part of a Regional Transportation Plan. The Metropolitan Planning Organization for the Project Site is the Southern California Association of Governments (SCAG). SCAG adopted the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy. As discussed in Section III, Air Quality, the Project would be consistent with the current City General Plan and Community Plan land use designation for the Project Site and would not create housing or otherwise lead to substantial unplanned population growth in the vicinity. Therefore, the Project would not be in conflict with population growth projections of the 2016 Regional Transportation Plan/Sustainable Communities Strategy or its goals associated with GHG reductions. As the Project would not interfere or conflict with local and regional goals and policies aimed at reducing the generation of GHG emissions, the Project impact would be less than significant.

Mitigation Measures: No mitigation measures are required.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
IX. 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 that 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 analysis is based on a Phase II Subsurface Investigation Report dated November 14, 2019 (2019 Phase II Investigation) prepared by Roux Associates, Inc. (Roux), in **Appendix F**. Roux reviewed the following three previous technical studies for the 2019 Phase II Investigation: a Phase II Subsurface Investigation dated September 12, 2018 (2018 Phase II Investigation) by Fulcrum Resources Environmental, a Phase I Environmental Site Assessment (ESA) dated August 15, 2018 (2018 Phase I ESA) prepared by DCI Environmental Services, and a Phase I ESA dated November 21, 2007 (2007 Phase I ESA) prepared by Environmental Applications, Inc. The September 2018 Phase II Investigation, August 2018 Phase I ESA, and 2007 Phase I ESA are available for review in the Project case file.

Impact Analysis

a. Less than Significant Impact. A significant impact may occur if a project involves the routine transport, use, or disposal of hazardous materials, of sufficient type and quantity, to create a significant

hazard to the public or the environment. Construction requires the transport and use of paints, solvents, and equipment fuel. Construction personnel are responsible for compliance with applicable safety procedures, manufacturer specifications, and Federal and State Occupational Safety and Health Administration regulations. The transport, use, and disposal of hazardous materials in compliance with applicable safety regulations would not represent a significant hazard to the public or environment. Project operations would involve the routine transport, use, or disposal of commonly used hazardous materials. The hazardous materials include cleaning supplies and solvents used for housekeeping, janitorial services, and landscape maintenance. The transport, use, and storage of these materials would not create a significant hazard to the public or the environment through compliance with manufacturer specifications and State Health and Safety Code regulations.

The Project involves the demolition and removal of an existing building and surface parking lot on the Project Site as shown in Figure 3, Existing Uses. Existing and previous building operations involved the transport, use, and disposal of hazardous materials, including petroleum-based oils, aqueous-based solvents, coolant, compressed gases, and waste oil stored in 55-gallon drums. Given the age of the existing building constructed in 1959, as shown in Los Angeles County Assessor data, there is potential for Asbestos Containing Materials (ACMs) and lead-based paints (LBPs) in building materials. The existing building was constructed prior to bans on ACMs in 1989 and LBP in 1978. Surveys for ACM and LBP were outside the scope of the 2018 Phase I ESA and 2019 Phase II Subsurface Investigation. To address the potential for encountering ACMs or LBP during demolition of the existing building, regulatory compliance measure **9-1** requires ACM and LBP surveys, and if present, disposal prior to demolition in accordance with applicable regulations. Regulatory compliance measure 9-1 would reduce the impact regarding the creation of a significant hazard due to the disposal of hazardous materials to less than significant.

Regulatory Compliance Measure:

9-1 Disposal of Potential Existing Hazardous Materials

Asbestos. Prior to the issuance of any permit for the demolition or alteration of the existing structure(s), the applicant shall provide a letter to the Department of Building and Safety from a qualified asbestos abatement consultant indicating that no Asbestos-Containing Materials (ACM) are present in the existing building. If ACMs are present, ACMs shall be abated in compliance with the South Coast Air Quality Management District's Rule 1403 and all other applicable State and Federal rules and regulations.

Lead Paint. Prior to issuance of any permit for the demolition or alteration of the existing structure(s), a lead-based paint survey shall be performed to the written satisfaction of the Department of Building and Safety. Should lead-based paint materials be identified, standard handling and disposal practices shall be implemented pursuant to Occupational Safety and Health Administration regulations.

b. Potentially Significant Unless Mitigation Incorporated. A project may have a significant impact if a project would 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. The 2019 Phase II Investigation notes the Project Site was first developed for residential (1924) and later converted to commercial use with issuance of a permit for a gasoline station (1954) and the installation of three 1,000-gallon underground storage tanks (USTs) containing gasoline (1955). The Project Site also became a wrecking yard in 1955. The existing building on the Project Site was

constructed in 1959 for automobile repair. The three USTs and dispensers were removed (1995) and soil samples were collected. Total petroleum hydrocarbons as gasoline (TPH-g), benzene, toluene, ethylbenzene, and total xylenes (BTEX) were within acceptable limits. Based on the lack of contamination detected in the soil samples, the City Fire Department terminated the UST permit and archived the closed file.

The 2018 Phase I ESA found no USTs, interceptors/clarifiers, or other sources of hazardous wastes at the Project Site and recommended no additional investigation, concluding the Project Site was safe for the existing use. The 2018 Phase I ESA identified portions of the Project Site were contaminated with low concentrations of petroleum hydrocarbons, ethylene glycol, and heavy metals released from damaged vehicles. The 2018 Phase I ESA recommended a soil vapor survey to confirm the Project Site would be safe for redevelopment to a previously-proposed residential use. Accordingly, the 2018 Phase II Investigation assessed soil conditions and vapor intrusion to residential standards. The 2018 Phase II Subsurface Investigation found: no existing USTs or piping, Volatile Organic Compounds (VOC) were within acceptable limits, with the exception of Tetrachloroethene (PCE), which was above residential screening levels in one soil vapor sample.[46] PCE is a manufactured chemical used for dry cleaning fabrics and degreasing metal. As a result of the concentration of PCE, found in one of the seven soil vapor probes, Fulcrum evaluated the sample using California Department of Toxic Substances Control methodology, for intrusion risk under a residential use scenario. The 2018 Phase II Investigation concluded the detected concentration of PCE did not indicate a human or environmental health risk from vapor intrusion.

Given a change in ownership, and a change in the proposed use from residential to light industrial, Roux prepared a 2019 Phase II Investigation. The 2019 Phase II Investigation expanded on previous technical studies to fully address prior environmental conditions. Due to the prior use as a wrecking yard and auto repair, the 2019 Phase II Investigation: 1) collected shallow soil samples to analyze petroleum hydrocarbons and metals 2) analyzed the nature and extent of PCE detected above residential limits in the southern portion of the Project Site reported in the 2018 Phase II Investigation, and 3) collect soil vapor samples from the area of the former USTs.

The 2019 Phase II Investigation found that one of the 14 samples for metals contained a concentration of arsenic and two of the 14 samples for lead exceeded regulatory criteria. Therefore, mitigation measure **9-1** requires investigation and remediation prior to construction. Seven of fifteen soil samples contained detectable concentrations of Total Petroleum Hydrocarbons (TPH) above reporting limits; although all the concentrations of TPH were below the San Francisco Regional Water Quality Control Board Tier I Environmental Screening Levels.[47] Levels of t-butyl alcohol (TBA) were detected in five of nine soil samples; although no screening level for TBA is established.

To assess soil vapor, the 2019 Phase II Investigation collected nine soil vapor samples from temporary soil vapor probes. Total Petroleum Hydrocarbons as gasoline (TPH-g) were not detected above reporting limits. Although 14 individual VOC constituents [48] were above laboratory reporting limits in one or more of soil vapor sample, chlorinated solvent tetrachloroethene (PCE) was the only VOC constituent above

[46] The concentration of PCE of 1,400 µg/m3 in one sample (SVP-10) exceeded the Environmental Screening Levels of 238 µg/m3 for PCE under a residential use scenario.

[47] Although the Project Site is located in the jurisdiction of the Los Angeles Regional Water Quality Control Board, the San Francisco Regional Water Quality Control Board is one of the only regulatory bodies with specific criteria for TPH; use of these criteria is an industry-standard practice for evaluating TPH.

[48] Laboratory tests for the following VOCs: Acetone, chloroform, cyclohexane, ethylbenzene, 4-ethyltoluene, heptane, hexane, methylene chloride, tetrachloroethene (PCE), toluene, 1,2,4-trimethylbenzene, o-xylene, p/m-xylene, 1,1-Difluoroethane (LCC).

regulatory agency criteria. The regulatory agency criteria for PCE is set by the California Department of Toxic Substances Control. The Project Site is also located in a Methane Buffer Zone designated by the Los Angeles Department of Building and Safety (LADBS). Therefore, mitigation measure **9-2** requires installation of a Vapor Intrusion Mitigation System (VIMS) beneath the foundation of the proposed building to prevent PCE vapor intrusion and the accumulation of methane beneath the foundation of the proposed building. Implementation of Mitigation Measures 9-1 through 9-2 would reduce impacts associated with the release of hazardous materials to less than significant.

Mitigation Measures:

9-1 Data Gap Investigation

To mitigate the release of lead and arsenic in the shallow soils on the Project Site, the Applicant shall retain a qualified consultant to investigate, delineate, and properly remediate soils to the written satisfaction of the Site Mitigation Unit of the Los Angeles County Fire Department prior to issuance of any permit for demolition, grading, or construction.

9-2 Vapor Intrusion Mitigation System

To mitigate potential vapor intrusion from tetrachloroethene (PCE) in soil vapor and methane at the Project Site, the Applicant shall install a Vapor Intrusion Mitigation System (VIMS) beneath the foundation of the proposed building. The Applicant shall submit design documents for the VIMS to the written satisfaction of the Site Mitigation Unit of the Los Angeles County Fire Department and the Department of Building and Safety prior to issuance of any permit for demolition, grading, or construction. The VIMS shall be designed in conformance with standard engineering principles and practices.

The Applicant shall retain a qualified engineer to independently analyze methane hazards as defined in Ordinance No. 175,790 and Section 91.7102 of the Los Angeles Municipal Code. As necessary depending on site conditions, the engineer shall investigate and design a methane mitigation system in compliance with the Methane Mitigation Standards for the appropriate Site Design Level to prevent or retard potential methane gas seepage into the building. The Applicant shall implement the engineer's design recommendations for review and approval by the Site Mitigation Unit of the Los Angeles County Fire Department, City of Los Angeles Department of Building and Safety, and City of Los Angeles Fire Department.

c. Less than Significant Impact. A significant impact may occur if a project would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. The Project is located within one-quarter mile of the East Valley High School, located at 5525 Vineland Avenue. Based on the 2018 Phase I ESA regulatory records, the East Valley High School was listed in various databases, including on the School Property Evaluation records, Resource Conservation and Recovery Act database, and Spill, Leak, Investigation and Cleanups database. The East Valley High School is considered a "case closed" school investigation site, and remedial action investigation for soil only contamination was completed at the facility in 2008. The Project would not use, store, or dispose of the types of hazardous materials, or hazardous materials in sufficient quantities, to result in a release of toxic emissions that would pose a public health hazard. Construction would involve the temporary use of paints, solvents, and equipment fuel. The construction crew would be responsible for the safe handling of these materials in compliance with safety procedures, manufacturer specifications, and Occupational Safety and Health Administration regulations. Operation

of a self-storage facility with artist studios would not cause a significant hazard to the public or environment. Therefore, potential hazards impacts to nearby schools would be less than significant.

Mitigation Measures: No mitigation measures are required.

d. No Impact. A significant impact may occur if a project is located on site that is included on a list compiled pursuant to Government Code Section 65962.5, and, as a result, would create a significant hazard to the public or the environment. Government Code section 65962.5 requires the California Environmental Protection Agency (CalEPA) to develop an updated Cortese List. The Cortese List is used by State and local agencies, and developers, to comply with the CEQA requirements for information about the location of hazardous materials release sites. The data sources that provide information regarding facilities or sites to meet Cortese List requirements consist of:

- The California Department of Toxic Substances Control EnviroStor Hazardous Waste and Substances Site List;
- The State Water Resources Control Board GeoTracker database for Leaking UST sites;
- Solid waste disposal sites identified by State Water Resources Control Board with waste constituents above hazardous waste levels outside the waste management unit;
- The State Water Resources Control Board list of Cease and Desist Orders and Cleanup and Abatement Orders; and
- Hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code, as identified the California Department of Toxic Substances Control.

A search of the Cortese List databases in the 2018 Phase I ESA showed the Project Site is not on the Cortese List.[49] According to the 2018 Phase I ESA, the Project Site appears on the following databases tracking hazardous materials:

- **Resource Conservation and Recovery Act Database.** Under the Resource Conservation and Recovery Act, the U.S. Environmental Protection Agency regulates hazardous material generators, transporters and storage/treatment/disposal sites. The Project Site was among the thirty-nine Resource Conservation and Recovery Act site listings located within a one-quarter mile radius, and Archer Vineland Service (same entity as Archer Towing) is listed as a small quantity generator with no posted violations.
- **Hazardous Waste Information System Database.** The Hazardous Waste Information System database is maintained by the California Department of Toxic Substance Control to keep track of the movement and disposal of hazardous waste. Zio Studio Rentals obtained a single-use permit to remove an unspecified solvent mixture in 2015 and Archer Vineland Service maintained permits to generate hazardous waste.
- **UST Database.** The State Water Resources Control Board also provides a list of all permitted USTs containing hazardous substances. Archers Towing Service maintained permits to operate three USTs at the Project Site, which were installed in 1955 and removed in September of 1995.

The 2018 Phase I ESA did not consider these database listings, or other such listings, to be significant environmental concerns with respect to the Project. No conditions were observed that indicate potential impact to the Subject Property from these sources of hazardous waste site listings. The 2019 Phase II Subsurface Investigation concluded that the research corroborated information provided in previous reports. Therefore, the Project would not result in the creation or exacerbation of a significant hazard to the public or the environment as a result of previous uses being included in lists of hazardous materials sites compiled pursuant to Government Code Section 65962.5. No impact would occur.

[49] DCI Environmental Services, Phase I Environmental Site Assessment August 15, 2018, page 15.

Mitigation Measures: No mitigation measures are required.

e. Less than Significant Impact. A project would have a significant impact if it is 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 and would result in a safety hazards or excessive noise for people residing or working in the project area. Although the Project Site is within two linear miles (approximately 1.8 miles) southwest of the Hollywood Burbank Airport, the Project Site is not located within the Planning Boundary, Airport Influence Area, or Runway Protection Zone of Hollywood Burbank Airport.[50] The Project conforms to building height restrictions, would not place structures within a designated flight path, and would not result in a safety hazard to people working within the area regarding aircraft operations. As shown in the Noise Study in Appendix G, the measured ambient noise level at the Project Site ranged from 51.9 to 71.3 dBA Leq. Existing noise level up to 75 dB CNEL are "conditionally acceptable" with industrial and manufacturing land uses as described in the Land Use Compatibility Guidelines of Noise Element of the General Plan. Therefore, the Project would not result in excessive noise for people working in the area, resulting in a less than significant impact.

Mitigation Measures: No mitigation measures are required.

f. Less than Significant Impact. A project would have a significant impact if it would interfere with an emergency response plan or emergency evacuation plan. The Project Site is located along Vineland Avenue and east of Lankershim Boulevard; both these are designated as Selected Disaster Routes in the Safety Element of the City General Plan.[51] The Project Site contains sufficient space for temporary construction crew parking and equipment staging to take place on site during all phases of construction, thereby minimizing the temporary interference of construction vehicles with existing vehicle circulation on the noted disaster routes. Vehicular access to the Project Site will be provided by means of ingress/egress driveways along Vineland Avenue and Cleon Avenue. The Project components are limited to Project Site boundaries and would not permanently alter vehicular circulation routes or impede public access or travel upon public rights-of-way, including Selected Disaster Routes. Therefore, neither Project construction or operations would physically interfere with an adopted emergency response plan or emergency evacuation plan, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

g. No Impact. A significant impact may occur if a project is located in proximity to wildland areas that pose a potential wildfire hazard to persons or structures. The Project is located in an urbanized area designated for light manufacturing uses that is not adjacent to, or in proximity (within a 0.5-mile radius) of wildland areas. The Project Site is not located within a Very High Fire Hazard Severity Zone (VHFHSZ).[52] Nonetheless, the Project would be required to comply with applicable City Building and Fire Code requirements in effect at the time of Building Permit issuance to protect against fire risks. As the Project is not located proximate to wildland areas, the Project would not expose people or structures to wildland fire risks, and no impact would occur.

Mitigation Measures: No mitigation measures are required.

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[50] Los Angeles County Department of Regional Planning, Airport Land Use Commission, Airport Influence Area, Burbank/Glendale/Pasadena Airport, Accessed on February 19, 2020 at: http://planning.lacounty.gov/assets/upl/project/aluc_airport-burbank.pdf.

[51] City of Los Angeles, Department of City Planning, General Plan, Safety Element, Exhibit H, Critical Facilities and Lifeline Systems in the City of Los Angeles, Adopted by City Council November 26, 1996.

[52] City of Los Angeles, ZIMAS, accessed February 20, 2020, at: http://zimas.lacity.org/.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
X. 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 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 on- or offsite erosion or siltation;	☐	☐	☒	☐
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offside;	☐	☐	☒	☐
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv. Impede or redirect flood flows?	☐	☐	☐	☒
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

Impact Analysis

a. Less than Significant Impact. A significant impact may occur if a project discharges water that does not meet the quality standards of agencies that regulate surface water quality and discharge into stormwater drainage systems or otherwise substantially degrade surface or groundwater quality. The California Regional Water Quality Control Board (State Water Board) and Los Angeles Regional Water Quality Control Board (Regional Water Board) adopted Waste Discharge Requirements (Order No. R4-2012-0175) for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles County (MS4 Permit).[53] The Los Angeles County MS4 Permit specifies requirements for discharges within Los Angeles County's coastal watersheds. This MS4 Permit was

[53] The State Water Board subsequently amended the MS4 Permit on June 16, 2015 (Order WQ 2015-0075).

issued in accordance with National Pollutant Discharge Elimination System (NPDES) Permit (No. CAS004001). The LAMC also provides Stormwater and Urban Runoff Pollution Control requirements. As a regulatory requirement of these existing MS4 Permits and the LAMC (Chapter VI, Article 4.4, Stormwater and Urban Runoff Pollution Control), the Project would comply with applicable regulations to prevent the violation of water quality standards or the degradation of ground water quality.

During construction, the Project would implement Best Management Practices (BMPs) for erosion and sediment control as specified in the Wet Weather Erosion Control Plan of the City Department of Public Works, including a requirement for construction sites with active grading to prepare and implement BMPs during the rainy season (October 1st and April 15th).[54] Compliance with Wet Weather Erosion Control Plan standards would reduce impacts regarding water quality standards during construction to less than significant.

During operations, the Applicant is required to submit a Low Impact Development (LID) Plan to the City Bureau of Sanitation, Watershed Protection Division, for review and approval during the plan check process prior to issuance of a grading or building permit.[55] Current LID regulations prioritize infiltration, capture/reuse, and biofiltration as the preferred stormwater control measures. Based on the results of percolation testing for the Geotechnical Report, shallow infiltration systems were not recommended.[56] Therefore, the Project proposes a dry well system for treatment and infiltration with overflows exiting the site via sheet flow to the storm drains in adjacent streets, pursuant to the LID Ordinance requirements. The existing drainage pattern would be maintained, while treating the stormwater, increasing percolation, and decreasing stormwater volumes and flows exiting the site into the storm drains.[57] The proposed storm water management system, prepared in compliance with Regional Water Board M4S Permit requirements, the City LID Ordinance, and the LAMC Stormwater and Urban Runoff Pollution Control requirements, would reduce potential impacts regarding water quality standards to less than significant.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact. A project would have a significant impact if it substantially decreased groundwater supplies or interfered with groundwater recharge such that a project may impede sustainable groundwater management of the basin. The Project Site is located in the San Fernando Basin, an 112,000-acre groundwater basin within the Upper Los Angeles River Area.[58] The Project would be served by the Los Angeles Department of Water and Power for potable water supply and does not propose groundwater extraction. Therefore, the Project would not substantially deplete groundwater supplies. According to the Geology Report, groundwater was not observed in the borings while drilling to a maximum depth of 71 feet below ground surface.[59] Similar to existing conditions, storm water would be conveyed to existing stormwater infrastructure on Vineland Avenue and Cleon Avenue. As urban in-fill, Project Site is disturbed by the placement of existing impervious surfaces. Furthermore, the Project features a permeable landscape area around the perimeter of the Project Site allowing for groundwater recharge; therefore, the Project would not substantially interfere with groundwater recharge such that the Project would impede sustainable groundwater management of the basin. Therefore, the impact to groundwater management of the basin would be less than significant.

[54] City of Los Angeles, Department of Public Works, Bureau of Contract Administration, Wet Weather Erosion Control Plan.
[55] Required by the City Stormwater LID Ordinance (Ordinance #181899).
[56] Terracon Consultants, Inc., Geotechnical Engineering Report, August 14, 2019.
[57] Robert J. DePrat, P.E., President/CEO, Blue Peak Engineering, Inc., Email correspondence with Envicom Corporation, February 12, 2020.
[58] Upper Los Angeles River Area Watermaster, http://ularawatermaster.com/index.html?page_id=589 (accessed Mar. 26, 2020).
[59] Terracon Consultants, Inc., Geotechnical Engineering Report, August 14, 2019.

Mitigation Measures: No mitigation measures are required.

c.i. Less than Significant Impact. A project would have a significant impact on surface water hydrology if it would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river through the addition of impervious surfaces, in a manner which would result in substantial or erosion or siltation on site. The Project Site, which does not contain streams or river courses, is located in an urbanized area of the City. During construction, the Project would be required to prepare and implement BMPs such as silt fencing that would reduce runoff leaving the site and filter storm water to reduce erosion or siltation. During operations, existing drainage sheet flows to drains the right-of-way on both Vineland Avenue and Cleon Avenue. During operations, stormwater draining from the Project Site would be collected into a dry well system for treatment and infiltration with overflows exiting the site by means of sheet flow to the adjacent streets pursuant to LID Ordinance requirements. Therefore, the existing drainage pattern would be maintained while pre-treating the stormwater, increasing percolation, and decreasing the stormwater volumes and flows exiting the site.[60] Through the proposed drainage features and compliance with existing LID Ordinance requirements, the Project would not result in substantial on- or offsite erosion or siltation and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

c.ii. Less than Significant Impact. A project would have a significant impact on surface water hydrology if it would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or offsite.

The Project Site is located in an urbanized area with no streams or river courses. The Project is not in a designated flood zone.[61] To control surface runoff, the Project proposes a dry well system for improved pre-treatment of stormwater. Similar to existing conditions, high volume overflows from the Project Site would be conveyed to existing stormwater infrastructure on Vineland Avenue and Cleon Avenue Therefore, the impact of the Project pertaining to the risk of release of pollutants due to location in flood hazard, tsunami, or seiche zone would be less than significant.

Mitigation Measures: No mitigation measures are required.

c.iii. Less than Significant Impact. A project would have a significant impact on surface water hydrology if it would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river through the addition of impervious surfaces, in a manner which would create or contribute runoff which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

The Project would not result in a significant increase in site runoff because the Project would not alter existing drainage patterns or substantially increase the volume or velocity of runoff from impervious surfaces. The Project features a permeable landscape area around the perimeter of the Project Site, allowing for greater storm water infiltration. Stormwater that overflows the infiltration capacity of the proposed dry well system would continue to be conveyed to existing storm drain inlets in Vineland

[60] Robert J. DePrat, P.E., President/CEO, Blue Peak Engineering, Inc., email correspondence with Envicom Corporation, February 12, 2020.
[61] City of Los Angeles, ZIMAS, Accessed on February 28, 2020 at: http://zimas.lacity.org/.

Avenue and Cleon Avenue, to enter the existing City storm drain system. The Project is subject to the MS4 NPDES Permit (No. CAS004001), requiring the implementation of BMPs to control runoff, and a Wet Weather Erosion Control Plan to reduce stormwater pollution runoff during construction. The Project would not substantially increase runoff volumes that could affect the existing capacity of the stormwater drainage system or provide substantial additional sources of polluted runoff to the existing drainage system, or otherwise substantially degrade water quality. The impact would be less than significant.

Mitigation Measures: No mitigation measures are required.

c.iv. No Impact. A project would have a significant impact on surface water hydrology if it would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river through the addition of impervious surfaces, in a manner which would impede or redirect flood flows. The Project is not located in a designated flood zone. During operations, the existing drainage pattern would be maintained while pre-treating the stormwater and decreasing the stormwater volumes and flows exiting the site.[62] During construction, the Project would implement BMPs for erosion and sediment control as specified in the Wet Weather Erosion Control Plan of the City Department of Public Works. Therefore, the Project would have no impact on impeding or redirecting flood flows.

Mitigation Measures: No mitigation measures are required.

d. Less than Significant Impact. A significant impact would potentially occur if a project would risk the release of pollutants from inundation due to location in a flood hazard, tsunami, or seiche zone. The Project is not located in a flood hazard or tsunami zone.[63] A seiche, a wave created when a body of water is shaken, is a concern at water storage facilities because inundation can occur if the wave overflows a containment wall. The Project proposes a storage facility, which would not contain large quantities of hazardous materials, nor support or draw a large daytime population that could be exposed to inundation hazards at the site. The Project Site is located in a potential inundation area.[64] No major water retaining structures are located immediately upgradient from the Project Site. The nearest water storage facilities are the Sepulveda Reservoir located approximately six miles west of the Project Site and the Hansen Reservoir, located approximately six miles north of the Project Site. The U.S. Army Corps of Engineers routinely monitors and maintains the Hansen Reservoir and Sepulveda Reservoir to prevent overflow.[65] Maintenance includes an annual safety inspection of the control house, gates, and all mechanical and electrical equipment to ensure functioning in accordance with the Dam Operations Manual. The U.S. Army Corps clears of debris and sediment and repairs to maintain the facility. Therefore, the impact of the Project pertaining to the risk of release of pollutants due to location in flood hazard, tsunami, or seiche zone would be less than significant.

Mitigation Measures: No mitigation measures are required.

e. No Impact. A project would have a significant impact if it conflicted with, or obstructed implementation of, a water quality control plan or sustainable groundwater management plan. The Project would replace an existing use served by the LADWP for domestic water; therefore, the Project does not propose groundwater extraction and would not interfere with a groundwater management plan. During

[62] Robert J. DePrat, P.E., President/CEO, Blue Peak Engineering, Inc., Email correspondence with Envicom Corporation, February 12, 2020.
[63] City of Los Angeles, ZIMAS, Accessed on February 28, 2020 at: http://zimas.lacity.org/.
[64] City of Los Angeles General Plan, Safety Element, Exhibit G, Inundation & Tsunami Hazard Areas, pg. 59.
[65] U.S. Army Corps of Engineers, Los Angeles District Website, https://www.spl.usace.army.mil/Missions/Asset-Management/Hansen-Dam/ (accessed March 26, 2020).

construction, the Project would implement BMPs for erosion and sediment control as specified in the Wet Weather Erosion Control Plan of the City Department of Public Works, including a requirement for construction sites with active grading to prepare and implement BMPs during the rainy season (October 1st and April 15th).[66] During operations, the Project would capture and convey storm water in compliance with LAMC Stormwater and Urban Runoff Pollution Control requirements for water quality. Therefore, the Project would not conflict with or obstruct implementation of a water quality control plan.

Mitigation Measures: No mitigation measures are required.

[66] City of Los Angeles, Department of Public Works, Bureau of Contract Administration, Wet Weather Erosion Control Plan.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XI. 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?	☐	☐	☒	☐

Impact Analysis

a. No Impact. A significant impact may occur if a project would be sufficiently large or otherwise configured in such a way as to create a physical barrier within an established community. The Project Site is located in an urban portion of the Community Plan area with an existing light industrial building used as office space for an equipment rental business. As in-fill development, the Project would replace an existing building with a new building. Therefore, the Project would not physically divide an established community. No impact would occur.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact. A significant impact may occur if a project causes a significant environmental impact due to inconsistency with the applicable land use plan, policy or regulation, including the zoning designations of a project site. The Project Site is located within the City and subject to the land use designations and zoning regulations of local land use plans and zoning ordinance.

Regional Plans

Regionally, the Project is located within the SCAG planning area, the federally-designated Metropolitan Planning Organization for the region. The Southern California Association of Governments is responsible for reviewing regionally significant local plans, projects, and programs for consistency with adopted regional plans. Given the Project's limited size, consistency with the General Plan, and lack of significant unavoidable impacts (as discussed throughout this IS/MND), the Project would not result in regionally significant impacts. The Project is located within the planning area of the South Coast Air Quality Management District, which implements the Air Quality Management Plan. As evaluated in Section III., Air Quality, the Project is also consistent with the Air Quality Management Plan, and no additional analysis is required.

City General Plan – Framework Element

The General Plan is a comprehensive, long-range declaration of purposes, policies and programs to guide development of the City. The General Plan Framework Element is a strategy for long-term growth which sets a citywide context to guide the update of the community plan and citywide elements. The Framework Element provides broadly applicable land use policies pertaining to commercial and industrial

development in Chapter 3, Land Use, under the heading for industrial areas.[67] As the Project requires a Vesting Zone Change from MR2 (Restricted Light Industrial Zone) to M2 (Light Industrial Zone), a consistency analysis with applicable provisions of the Framework Element regarding industrial development is presented in **Table XI-1, Consistency Analysis with General Plan Framework Land Use Policies**.

Table XI-1
Consistency Analysis with General Plan Framework Land Use Policies

General Plan Framework Policy	Consistency Analysis
Chapter III: Land Use	
Policy 3.14.1 Accommodate the development of industrial uses in areas designated as "Industrial-Light," "Industrial-Heavy" and "Industrial-Transit" in accordance with Tables 3-1 and 3-9 [shown in the Framework Element of the General Plan]. The range and densities/intensities of uses permitted in any area shall be identified in the community plans.	**Consistent:** The Project would provide light industrial development in an area designated for such uses by the Community Plan. The General Plan Land use designation is Light Manufacturing. According to Table 3-1 of the Framework Element, typical Light Industrial uses are: • Industrial uses with potential for a low level of adverse impacts on surrounding land uses. • Increased range of commercial uses that support industrial uses (through zoning amendments). • Possible consideration for other uses where parcels will not support viable industrial uses (determined by community plan). With regard to the characteristics of surrounding uses, the property north of the Project Site consists of equipment rental, storage facilities, repair shops, and neighborhood serving retail. Properties south of the site consist of self-storage facilities and neighborhood-serving retail. Properties to the east consist of media production facilities and light manufacturing. Table 3-7 in the Framework Element states the General Land Use Designation of Industrial Light has the corresponding zones of CM, MR1, MR2, M1 and M2. The requested zone change from MR2 to M2 is consistent with the range of corresponding zones for the land use designation; the Project would not result in any incompatibilities with adjacent uses or zones, the Project is consistent with Policy 3.14.1.
Source: Citywide General Plan Framework, adopted by the City Council August 8, 2001.	

As shown in Table XI-1, the Project would be consistent with the applicable General Plan Framework Element policy regarding light industrial development, such as self-storage uses.

[67] Los Angeles City Planning Department, The Citywide General Plan Framework An Element of the City of Los Angeles General Plan, Chapter 3, Re-adopted by City Council on August 8, 2001.

City General Plan – Mobility Plan 2035

The Mobility Plan 2035 provides the foundation to building a transportation system that balances the needs of all users.[68] Various goals, objectives, and policies within this element aim toward achieving a balanced transportation system. Goals applicable to the Project include:

- **Policy 3.1** – Access for All – The Project provides sidewalk access on Vineland Avenue to facilitate pedestrian mobility within the area in accordance with applicable accessibility regulations.
- **Policy 3.5** – Multi-Modal Features –The Project provides convenient and secure bicycle parking facilities. The Project Site is located with pedestrian access to the following bus stops within a quarter-mile radius: Vineland/Burbank (Stop ID: 7196) and Vineland/Chandler (Stop ID: 15548), both serving the Metro 152 line, which provides access to the Metro G Line (formerly Orange Line) and B Line (formerly Red Line) Stations in North Hollywood. Additional bus stops are located within 0.5 mile, and the Project Site is less than 0.25 mile north of the designated Chandler Bikeway.
- **Policy 3.8** – Bicycle Parking – The Project provides convenient and secure bicycle parking facilities with 16 short-term spaces and 16 long-term bicycle parking spaces.

Pedestrian access would be provided from a public sidewalk located along Vineland Avenue directly to an entrance on the west side of the building. Multiple bus stops are within 0.5 mile of the Project Site, which to increase use of public transportation, as well as access to the nearby designated Chandler Bikeway. Additionally, as noted above, the Project provides short- and long-term bicycle parking spaces. Therefore, the Project would be consistent with the applicable policies of the Mobility Plan 2035.

North Hollywood – Valley Village Community Plan

The Project is located in the North Hollywood – Valley Village Community Plan (Community Plan) area of the City with a land use designation of Light Manufacturing. The Community Plan proposes industrial uses in areas where they will not adversely affect surrounding development and aims to encourage the inclusion of environmentally sensitive industrial uses within the industrial areas.

The Project would provide light industrial and commercial development in an area designated for such uses by the Community Plan. The General Plan Land use designation is Light Manufacturing. The Project would also be of similar scale, mass, land use and density as surrounding uses. Surrounding properties to the north, east, and south are also designated for Light Manufacturing land uses in the Community Plan. The Project would be accessible to public railways and transportation. The Project provides parking in a surface lot that wraps around the southerly and easterly sides of the proposed building. Landscaping would be provided along the site perimeter as a buffer to separate the Project Site from adjacent uses. In addition, the proposed four-story building would have a variable height to a maximum of 45 feet over one level of subterranean storage and would conform to the height regulations, subject to approval of the Vesting Zone Change and Height District Change.

In addition to jobs associated with operation of the self-storage component of the Project, the Artists & Makers Studios would generate up to 150 permanent on-site artist jobs (approximately 92 jobs per acre) and an anticipated 131 direct on-site construction jobs.[69] This is higher than other types of uses that might be allowed in the existing MR2-1VL Zone, such as industrial uses, that typically have lower employment densities of 500 to 1,000 SF per employee, which translates to 40-100 jobs on the Project Site based on

[68] Los Angeles Department of City Planning, Mobility Plan 2035, An Element of the General Plan, Adopted September 7, 2016.
[69] RCLCO Real Estate Advisors, Market Feasibility Analysis, June 3, 2020, pg. 13.

the probable size of a new industrial building.[70] As the Project compliments surrounding land uses, is consistent with the industrial goals envisioned by the Community Plan, and supports City goals for job creation in the NoHo Arts District, the Project would be consistent with the Community Plan.

Los Angeles Municipal Code and Zoning

The Project Site is zoned MR2-1VL, meaning Restricted Light Industrial Zone (MR2) in Height District No. 1VL. The Applicant is requesting a Vesting Zone Change and Height District Change from MR2-1VL (Restricted Light Industrial Zone) to M2-2D (Light Industrial Zone), the environmental effects of which are considered in this Initial Study, to allow for commercial offices for artist studios and self-storage uses. The Vesting Zone Change and Height District Change would allow a four-story building that would comply with the 45-foot height limit as well as achieve a 2:1 Floor Area Ratio (FAR) in a location where FAR is currently restricted to 1.5:1. With approval of the Vesting Zone Change, the Project would not conflict with applicable land use plans, policy or regulations of agencies with jurisdiction over the Project adopted for the purpose of avoiding or mitigating an environmental effect. The Project would result in a less than significant impact.

Mitigation Measures: No mitigation measures are required.

[70] RCLCO Real Estate Advisors, Market Feasibility Analysis, June 3, 2020, pg. 13.

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

Impact Analysis

a-b. No Impact. A significant impact may occur if a project is located in an area used, or available for extraction of, a regionally important mineral resource, or if a project would convert an existing or future regionally important mineral extraction use to another use or would affect access to a site used or available for regionally important mineral resource extraction.

The existing use is light industrial. The proposed use is light industrial and commercial in an existing urban setting designated for light manufacturing uses. According to the California Department of Conservation Mineral Land Classification Map, the Project Site is located within a Mineral Resource Zone (MRZ)-2, meaning adequate information indicated that significant mineral deposits are present or there is a high likelihood for their presence.[71] As the Project Site is in-fill development within a light industrial zone, the land is not suitable for mining, mineral resources would not be impacted by the Project.

Additionally, based on California Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR), no oil wells are identified on site,[72] which was confirmed by the Phase I ESA site inspection and also did not indicate any wells on-site. As neither the existing nor proposed use involves the extraction of mineral resources, the Project would not result in the loss of availability of known mineral resources or a locally important mineral resource recovery site. As such, no impact associated with the loss of availability of a known mineral resource would occur.

Mitigation Measures: No mitigation measures are required.

[71] California Department of Conservation, Special Report 143, Plate 2.1, Generalize Aggregate Resource Classification Map, 1979.
[72] City of Los Angeles, ZIMAS, Accessed on March 3, 2020 at: http://zimas.lacity.org/.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XIII. 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?	☐	☐	☐	☒

Impact Analysis

This analysis is based on the Noise and Vibration Study prepared by Envicom Corporation dated January 22, 2020, provided in **Appendix G**. This summary introduces key terms and concepts used in noise impact analysis. Noise is unwanted sound. Sound is mechanical energy transmitted in pressure waves through a compressible medium such as air. Sound pressure level, expressed in decibels (dB), is the most common descriptor to characterize the perceived "loudness" of a given sound pressure level. A dB is a ratio of the unit of sound pressure to an assumed zero sound level. Variations in noise exposure over time are expressed in terms of a steady-state energy level equivalent to the energy content of the time period, called L_{eq}. A L_{eq} measurement can be conducted for any time period, but generally they are conducted for at least 15 minutes for environmental noise studies. Community receptors are more sensitive to unwanted noise intrusion during the evening and at night. Therefore, for planning purposes, state law requires the use of the Community Noise Equivalent Level (CNEL), a descriptor of 24-hour noise that uses a weighted average of noise levels over time with a five-dB penalty in the evening (7:00 PM - 10:00 PM) and 10-dB penalty at night (10:00 PM - 7:00 AM).

a. Less than Significant Impact. A project may result in a significant noise impact by generating a substantial temporary or permanent increase in ambient noise levels in the vicinity of a project in excess of standards established in the local general plan or noise ordinance. The following analysis defines temporary increases in ambient noise as short-term increases resulting from the use of construction equipment and permanent increases in ambient noise as long-term increases resulting from operation of the proposed building components and vehicular trips generated once the building is in use.

Temporary Noise - Construction

The City General Plan Noise Element contains Guidelines for Noise Compatible Land Uses relating to permanent noise sources, such as airports or freeways. Temporary noise from construction equipment is regulated through the LAMC, which limits noise to specified times. Noise from construction activity is

also intermittent, meaning the source strength varies sharply depending on the duration of equipment operation and physical distance between source and receptor.

As a regulatory requirement, Project construction is required to take place between 7:00 AM to 9:00 PM on weekdays, 8:00 AM to 6:00 PM on Saturdays and national holidays and no construction on Sundays (LAMC Section 41.40). During construction, the standard of 75 dB(A) at 50 feet for the operation of any powered equipment or powered hand tool would apply to the extent technically feasible (LAMC Section 112.05). Limiting construction activities to the daytime precludes construction noise during the hours when people normally sleep and during the early morning and evening hours when people are typically within their home and more sensitive to noise.

The Construction Noise Handbook prepared by the Federal Highway Administration includes a national database of construction equipment noise levels. The Federal Highway Administration uses these reference noise levels in the Roadway Construction Noise Model. **Table XIII-1, Construction Equipment Noise Levels**, identifies highest (L_{max}) noise levels associated with common construction equipment. Table XIII-1 lists the types of equipment expected for use in Project construction, and identifies the noise level for each individual piece of equipment at a 50-foot distance between the equipment and receptor as specified in the LAMC (Section 112.05).

Table XIII-1
Construction Equipment Noise Levels

Phase	Quantity and Equipment Type [1]	Lmax at 50 ft (dBA) [2, 3]	Usage Factor (U.F.) [4]	Hourly Leq at 50 ft (dBA)
Demolition	1 Concrete/Industrial Saw	90	20	83
	1 Rubber-tired Dozer	82	40	78
	3 Tractors/Loaders/Backhoes	79	40	75
Grading	1 Excavator	81	40	77
	1 Grader	85	40	81
	1 Rubber-tired Dozer	82	40	78
	3 Tractors/Loaders/Backhoes	79	40	75
Building Construction	1 Crane	81	16	73
	1 Forklifts	75	20	68
	1 Generator Set	81	50	78
	3 Welders	74	40	70
	1 Tractors/Loaders/Backhoes	79	40	75
Paving	1 Cement/Mortar Mixers	79	40	75
	1 Paver	77	50	74
	1 Paving Equipment	83	20	76
	1 Roller	80	20	73
	1 Tractors/Loaders/Backhoes	79	40	75
Architectural Coating	1 Air Compressor	78	40	74

[1] Construction Equipment List from Larry Damato, Principal at DAI General Contracting, email correspondence with Envicom Corporation, December 30, 2019.
[2] Lmax levels are for individual equipment pieces. Each piece of equipment would operate at a distance from other equipment.
[3] Source: Federal Highway Administration, Construction Noise Handbook, Ch. 9, Construction Equipment Noise Levels and Ranges.
[4] Usage Factor (U.F.) is the portion of time equipment is operating at full power.

As shown in Table XIII-1, the construction equipment that could generate the highest noise level is a concrete saw which would generate a maximum noise level of 90 dBA Lmax at 50 feet (ft) and an average noise level of 83 dBA Leq at 50 ft. At any particular phase of construction, contractors would use only the types of equipment needed as shown in Table XIII-1, rather than using all the equipment throughout all phases. Furthermore, decibels are logarithmic units; therefore, sound levels cannot be added by ordinary arithmetic means. When the sound pressure level of two sources is equal, the resulting noise level is 3 dB greater than the noise level of one source.

Within a residential zone or within 500 ft thereof, the City construction noise threshold is 75 dBA at 50 ft from the source unless compliance is "technically infeasible" despite the use of mufflers, shields, sound barriers and/or other noise reduction device or techniques during the operation of the equipment (LAMC Section 112.05). Although there are no residential land uses located within 500 ft of the Project Site, a parcel approximately 385 ft west of the Project Site associated with East Valley High School is zoned R4-1L. **Table XIII-2, Construction Equipment Noise with Regulatory Compliance**, shows the effect of standard noise reduction features and techniques in the use of construction equipment on the Project Site at a distance of 50 ft. Standard noise reduction techniques include the use of industrial-grade mufflers on mobile equipment or sound transmission obscuring products, such as acoustical blankets, enclosures, barriers, screens or equivalent placed around the equipment or construction site. With reduction measures, average levels at 50 feet from the Project Site would temporarily increase by 1 to 19 dBA Leq to the north of the Project Site, 0 to 10 dBA Leq to the east, 1 to 21 dBA Leq to the south, and 0 to 10 dBA Leq to the west.

Table XIII-2
Construction Equipment Noise with Regulatory Compliance

Equipment	Lmax at 50 ft (dBA) [1]	Reduction for 75 dBA	LAMC Compliance Reduction Measure [2]	Reduced Lmax at 50 ft (dBA)
Concrete Saw	90	15	Barrier	70
Rubber Tired Dozer	82	7	Muffler	67
Tractor/Loader/Backhoe	79	4	Muffler	64
Excavator	81	6	Muffler	66
Grader	85	10	Muffler	70
Crane	81	6	Muffler	66
Forklift	75	0	None	75
Generator Set	81	6	Muffler	66
Welder	74	0	None	74
Cement and Mortar Mixer	79	4	Muffler	64
Paver	77	2	Muffler	62
Paving Equipment	83	8	Muffler	68
Roller	80	5	Muffler	65
Air Compressor	78	3	Barrier	58

[1] Source: Federal Highway Administration, Construction Noise Handbook, 2006, Chapter 9, Construction Equipment Noise Levels and Ranges.
[2] Pursuant to LAMC Section 112.05, compliance refers to the use of mufflers as acoustical blankets, enclosures, barriers, screens and/or other noise reduction device or techniques during the operation of the equipment.

As shown in Table XIII-2, regulatory compliance with the LAMC standards requiring mufflers, shields, sound barriers or other noise reduction device or techniques during the operation of the equipment would reduce the construction noise levels from the equipment to 75 dBA or less at 50 ft through industrial-grade mufflers on mobile equipment and barriers or enclosures formed by sound transmission obscuring products placed around stationary equipment (LAMC Section 112.05). Therefore, construction-related

temporary noise level increases would be less than significant through compliance with regulatory requirements (LAMC Section 112.05).

Permanent Noise - Operations

Vehicle Loading and Unloading

The Project would include a loading dock in the building for the self-storage units. This dock could be accessed at any time during the hours of self-storage secure customer access, Sunday through Saturday, 5:00 AM to 10:00 PM. The LAMC prohibits the loading or unloading of any vehicle or operation of dollies, carts, forklifts or other wheeled equipment which causes any impulsive sound or raucous or unnecessary noise within 200 ft of any residential building between the hours of 10:00 PM and 7:00 AM (LAMC Section 114.03). Although loading and unloading activities would potentially occur before 7:00 AM, the nearest residential building to the Project Site is located approximately 570 feet south of the Project boundary which is far greater than the 200-foot distance specified in the LAMC. Therefore, the hours of vehicle loading and unloading would not be restricted and operational noise from vehicle loading and unloading would be less than significant.

Heating, Ventilation, and Air Conditioning Units

The Project proposes a total of 25 roof-mounted Heating, Ventilation, and Air Conditioning (HVAC) units in two clusters of 12 and 13 each on the north side of the property boundary as shown in Figure 4, Site Plan. Based on the noise levels specified in the manufacturer's specification sheets for HVAC units similar to those expected for the Project, each HVAC unit would produce noise levels of 68 dBA at 3.3 feet. This analysis assumes all 25 roof-mounted HVAC units are in simultaneous use as a "worst-case" scenario, although actual HVAC use would depend on weather conditions and tenant occupancy. Of the adjacent properties, the area which would experience the greatest level of noise from HVAC operation would be the industrial land use to the north, nearest to the northwestern cluster of HVAC units. For each of the two clusters of HVAC units, the simultaneous operation of 12 or 13 HVAC units would result in a composite noise level of 78.8 dBA and 79.1 dBA, respectively at a distance of 3.3 feet.

The proposed HVAC units would be required to comply with the City's noise ordinance standards. The LAMC prohibits any HVAC unit from exceeding the ambient noise level on any other occupied property by more than 5 dBA (LAMC Section 112.02). According to four ambient noise measurements taken on January 14, 2020, existing daytime ambient noise levels on the Project Site range from 60 to 71.3 dBA Leq. The nighttime presumed ambient level from the LAMC is 55 dBA Leq. **Table XIII-3, HVAC Noise Levels,** shows the estimated operational noise levels from the HVAC units.

Table XIII-3
HVAC Noise Levels

HVAC Source	Reference HVAC Noise Level at 3.3 feet (dBA)	Quantity	Composite Noise Level (dBA Leq)	Average Distance to Receptor (feet)	Distance Attenuation (dBA)	Parapet/ Roofline Reduction (dBA) [2]	Noise Level (dBA Leq)
Northwest	68[1]	13	79.1	6	5.2	24	49.9
Northeast		12	78.8	180	34.7	22	22.1
Total		**25**	**82.0**	**--**			**50.0**

[1] York International Corporation, Technical Guide for R-410A ZE/XN SERIES 3 - 6 TON 60 Hertz. Accessed at https://www.york.com/-/media/york/for-your-workplace-rooftop-units/5190086ytge0718.pdf?la=en on December 27, 2019. Specifications for York Model XN036 3-Ton packaged heating and cooling unit. The specified sound power level (Lw) of 76 dBA is equivalent to a sound pressure level of 68 dBA Leq at 3.3 feet, assuming a half-spherical propagation of sound due to roof mounting.

[2] Calculations based on site plan using equations for barrier attenuation from Bies, David A. and Hansen, Colin H., *Engineering Noise Control*, Third Edition, 2003, pages 393 – 296.

As shown in Table XIII-3, the estimated operational noise level from the 25 proposed HVAC units would be 50.0 dBA Leq at the nearest adjacent property after attenuating for distance and barrier attenuation for the parapet and roofline. The addition of 50.0 dBA from the 25 proposed HVAC units to the ambient daytime Leq would result in a 0.2 dBA increase above the measured daytime ambient noise level of 62.5 dBA at the northern property boundary. At nighttime, the HVAC would result in a 1.2 dBA increase above the presumed nighttime ambient noise level. All other property boundaries would experience lower levels of HVAC noise. Therefore, operational HVAC noise would not exceed the ambient noise level by more than 5 dBA in compliance with the LAMC (Section 112.02). The impact of operational HVAC noise on adjacent properties would be less than significant.

Traffic Noise

Upon completion, Project-generated vehicle use would incrementally increase traffic noise levels on local streets throughout the Project area. Peak hour traffic volumes for intersections in the project vicinity in the Existing Year (2020) and Opening Year (2023) for without and with project scenarios were obtained from the project's transportation assessment.[73] The net project trip generation would be 345 daily trips. For the purposes of the following analysis of traffic noise, the peak hour turn volumes were tabulated into segment volumes and converted into average daily trips (ADT). To estimate ADT from peak hour volumes, the p.m. peak hour volumes were multiplied by a standard factor of 10. The traffic noise level increase was calculated by comparing traffic volumes for the "with Project" scenario and the "without Project" scenario.

Table XIII-4, Existing Year Project-Related Traffic Noise Increase shows the existing year (2020) traffic noise increase, and **Table XIII-5, Opening Year Project-Related Traffic Noise Increase** shows the opening year (2023) Project-related traffic noise increase.

Table XIII-4
Existing Year Project-Related Traffic Noise Increase

Roadway Segment	Existing (2020) ADT	Existing (2020) With Project ADT	Existing Project-Related Noise Increase (dBA CNEL)
Vineland Avenue, north of Chandler Boulevard (North)	19,540	19,630	0.0
Vineland Avenue, from Chandler Boulevard (North) to Chandler Boulevard (South)	21,890	22,040	0.0
Vineland Avenue, south of Chandler Boulevard (South)	18,850	18,940	0.0
Chandler Boulevard (South), west of Vineland Avenue	8,960	9,020	0.0
Chandler Boulevard (North), from Vineland Avenue to Cleon Avenue	3,490	3,565	0.1
Chandler Boulevard (North), east of Cleon Avenue	3,150	3,210	0.1
Cleon Avenue, North of Chandler Boulevard (North)	580	710	0.9
Data Source: Overland Traffic Consultants, Inc., Transportation Assessment for Artist Office Suites & Self Storage Mixed-Use Project, August 2020.			

[73] Overland Traffic Consultants, Inc., Transportation Assessment for Artist Office Suites & Self Storage Mixed-Use Project, August 2020.

Table XIII-5
Opening Year Project-Related Traffic Noise Increase

Roadway Segment	Opening Year (2023) ADT	Opening Year (2023) With Project ADT	Opening Year (2023) Project-Related Noise Increase (dBA CNEL)
Vineland Avenue, north of Chandler Boulevard (North)	21,200	21,290	0.0
Vineland Avenue, from Chandler Boulevard (North) to Chandler Boulevard (South)	23,765	23,915	0.0
Vineland Avenue, south of Chandler Boulevard (South)	20,180	20,270	0.0
Chandler Boulevard (South), west of Vineland Avenue	10,010	10,070	0.0
Chandler Boulevard (North), from Vineland Avenue to Cleon Avenue	3,780	3,855	0.1
Chandler Boulevard (North), east of Cleon Avenue	3,420	3,480	0.1
Cleon Avenue, North of Chandler Boulevard (North)	600	730	0.9
Data Source: Overland Traffic Consultants, Inc., Transportation Assessment for Artist Office Suites & Self Storage Mixed-Use Project, August 2020.			

As Tables XIII-4 and XIII-5 show, the Project would not increase traffic noise levels on Vineland Avenue and Chandler Boulevard (South). The Project would increase traffic noise levels on Chandler Boulevard (North) by 0.1 dBA CNEL in both the existing year and opening year. On Cleon Avenue, the Project would potentially increase traffic noise levels by 0.9 dBA CNEL in both the existing year and opening year. The Project-related traffic noise level increases would be less than 3 dBA and would not be perceptible to the human ear in an outdoor environment. Therefore, the impact of traffic-related permanent increases in ambient noise levels would be less than significant.

Landscape Maintenance Noise

Project operations would include the use of lawn mowers, backpack blowers, edgers and landscape maintenance equipment for site upkeep and operations. Contractors would reasonably be expected to conduct routine landscape maintenance during daytime hours, therefore avoiding the period when such equipment noise is restricted between 10:00 PM and 7:00 AM required by the LAMC (Section 112.04). As landscape maintenance noise would be regulated by the LAMC, landscape maintenance noise-related permanent increases in ambient noise levels would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. Potentially Significant Unless Mitigation Incorporated. A significant noise impact may occur if a project generates excessive ground-borne vibration or ground-borne noise levels. Construction activities generate groundborne vibration when heavy equipment travels over unpaved surfaces or engages in soil movement. The effects of groundborne vibration include the discernible movement of building floors, rattling of windows, shaking of items on shelves or hanging on walls, and rumbling sounds. Vibration related problems generally occur due to resonances in the structural components of a building. The "soft" sedimentary conditions of much of southern California dampen groundborne vibration over a relatively short distance.

Groundborne Vibration Damage Potential

Groundborne vibration from construction activities rarely reach levels that can damage structures. Although there are no officially adopted regulatory standards for the point at which groundborne vibration levels could cause structural damage, the Federal Transit Administration provides guidelines regarding structural vibration damage criteria. For the purpose of analyzing groundborne vibration impacts in terms of potential structural damage, the following analysis relies on a Federal Transit Administration guideline criterion of 0.2 PPV in/sec for non-engineered timber and masonry buildings as the threshold of significance. Predicted vibration levels generated by construction equipment are provided in terms of Peak Particle Velocity (PPV), a unit of measurement used by regulatory agencies including the Federal Transit Administration and California Department of Transportation. The predicted vibration levels generated by construction equipment and potential associated structural damage are provided in **Table XIII-6, Groundborne Vibration Levels During Construction**.

Table XIII-6
Groundborne Vibration Levels During Construction

Construction Equipment	Reference Vibration Levels at 25 feet	Vibration Levels at Nearest Residential Structures		Vibration Damage Impact Assessment	
	PPV in/sec at 25 feet	Distance (feet)	PPV in/sec	Vibration Damage Threshold (PPV) in/sec)	Exceedance?
Loaded	0.076	15[1]	0.164	0.2	No
Small bulldozer	0.003	<15	>0.006	0.2	No

Data Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018.
[1] As a project feature, loaded trucks would not operate within 15 feet of any off-site structure, nor within 135 feet of any recording studio.

As shown in Table XII-6, the greatest vibration levels would be generated by loaded trucks which would generate vibration levels of 0.076 PPV in/sec at 25 feet. The groundborne vibration structural damage criteria for non-engineered timber or masonry buildings is 0.2 PPV in/sec. The off-site structures nearest the Project Site boundary are the recording studio and light industrial uses adjacent to the southern Project Site boundary and the light industrial use adjacent to the northern Project Site boundary. As a Project design feature, loaded trucks would not operate within 15 feet of any off-site structure. Therefore, vibration levels at the nearest structures would not exceed 0.164 PPV in/sec, which would be below the applicable structural damage criteria of 0.2 PPV in/sec; therefore, the Project would have no impact in terms of structural damage.

Groundborne Vibration Annoyance Potential

Human responses to groundborne vibration vary depending on the frequency of events. For the purpose of analyzing groundborne vibration impacts in terms of human response, the following analysis relies on the Federal Transit Administration assessment criterion of 65 VdB for highly sensitive land uses such as recording studios, 80 VdB for residential buildings and 83 VdB for institutional land uses. The predicted vibration levels generated by construction equipment and potential associated human annoyance impacts to nearby vibration-sensitive receptors are provided in terms of VdB in **Table XIII-7, Groundborne Vibration Annoyance Potential from Construction**.

Table XIII-7
Groundborne Vibration Annoyance Potential from Construction

Receptor	Construction Equipment	Reference Vibration	Attenuated Vibration Levels		Vibration Annoyance Impact Assessment	
		VdB at 25 feet	Distance (feet)	VdB	Vibration Annoyance Criteria (VdB)	Exceedance?
Cristal Clarity Recording (South)	Loaded trucks	86	130[1]	65	65	No
	Small bulldozer	58	<15	>65	65	Yes
Blue Palm Mixing and Recording (East)	Loaded trucks	86	130	65	65	No
	Small bulldozer	58	75	44	65	No
East Valley High School (West)	Loaded trucks	86	115	66	83	No
	Small bulldozer	58	115	38	83	No

Data Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018.
[1] As a Project feature, loaded trucks would not operate within 130 feet of any recording studio.

As a Project feature, loaded trucks would not operate during construction within 130 feet of any recording studio during the times in which recording would occur, to the extent feasible. Based on Table XIII-7, vibration levels at the nearest recording studio adjacent to the southern Project Site boundary (Cristal Clarity Recording Studio), would potentially reach 65 VdB when loaded trucks operate at 130 feet from the studio. This vibration level would not exceed the Federal Transit Administration vibration impact criterion of 65 VdB for human annoyance at high sensitivity land uses (e.g. recording studios). As Table XIII-7 shows, at the second closest recording studio located approximately 75 feet east of the Project Site, vibration levels would reach 65 VdB when loaded trucks operate at a distance of 130 feet from the structure (55 feet from the eastern Project Site boundary). This vibration level would not exceed the Federal Transit Administration vibration impact criterion of 65 VdB for human annoyance at high sensitivity land uses (e.g. recording studios). All other recording studios in the Project vicinity are further away and would therefore experience lower levels of vibration.

The nearest institutional buildings with a vibration-sensitive use are the school buildings to the west of the Project Site across Vineland Avenue. The closest school building is located approximately 115 feet west of the construction boundary and would experience vibration levels of up to 66 VdB when loaded trucks operate at the nearest construction boundary, as Table XIII-7 shows. This vibration level would not exceed the Federal Transit Administration vibration impact criterion of 83 VdB for human annoyance at institutional land uses.

As shown in Table XIII-7, groundborne noise from a small bulldozer operating at less than 15 feet from the nearest recording studio, Cristal Clarity Recording Studio, would be 65 VdB or greater, which would exceed the Federal Transit Administration vibration impact criterion of 65 VdB for human annoyance at high sensitivity land uses. Based on the determinations of the Noise and Vibration Analysis, mitigation measure **13-1** requires the Project to implement one or more measures to reduce annoyance from groundborne vibration resulting from construction activities. With mitigation incorporated, the Project would result in a less than significant impact related to the generation of excessive ground-borne noise levels. **Table XIII-8, Mitigated Groundborne Vibration Annoyance Potential from Construction**, shows the effect Mitigation Measure 13-1 would have on mitigating groundborne vibration within 15 feet of the recording studio adjacent to the southern Project Site boundary.

Table XIII-8
Mitigated Groundborne Vibration Annoyance Potential from Construction

Receptor	Construction Equipment	Reference Vibration	Attenuated Vibration Levels		Vibration Annoyance Impact Assessment	
		VdB at 25 feet	Distance (feet)	VdB	Vibration Annoyance Criteria (VdB)	Exceedance?
Cristal Clarity Recording (South)	Loaded trucks	86	130[1]	65	65	No
	Small bulldozer	58	15	65	65	No

Data Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018.
[1] As a Project feature, loaded trucks would not operate within 130 feet of any recording studio.

As shown in Table XIII-8, mitigated vibration levels would not exceed the human annoyance criterion for high sensitivity land uses at the nearest recording studio. Mitigation Measure 13-1 also provides alternative methods by which the performance standard may be reached. Therefore, with mitigation incorporated, the Project would result in a less than significant impact related to the generation of excessive ground-borne noise levels.

Mitigation Measures:

13-1 Increased Vibration Levels (Construction Activities)

To reduce the impact of groundborne vibration and noise annoyance potential from a bulldozer operating less than 15 feet from the recording studio nearest the southern Project Site boundary, the Applicant shall implement one or more of the following options:

- Provide a minimum 15-foot setback of bulldozer activity from the recording studio adjacent to the southern Project Site boundary,
- Substitute equipment with lower groundborne vibration generation potential. This measure would reduce vibration at the adjacent recording studio to a level that would not exceed the human annoyance criterion for high sensitivity land uses,
- Give prior notification to the recording studio to avoid or minimize the interference of Project construction on existing business operations. This measure would reduce activity interference at the recording studio by allowing for the rescheduling of vibration-intensive construction activities (i.e. bulldozer operation within 15-feet of the building) or recording, thereby reducing or eliminating co-occurrence of the sensitive activity with the potential exceedance of vibration criteria.
- If the 15-foot bulldozer setback is not technically feasible, vibrations should be monitored and recorded with seismographs during bulldozer activity within the 15-foot buffer to detect the magnitude of vibration and oscillation experienced by adjacent structures. If the vibration levels at the recording studio exceed 65 VdB (equivalent to approximately 0.007 PPV in/sec), the construction contractor shall modify the procedure to reduce the values to acceptable levels.

Prior to issuance of a grading permit, the Los Angeles Department of Building and Safety (LADBS) shall ensure the applicant notates, on the Project Grading Plan, the appropriate setbacks or equipment substitutions at final plan check to the satisfaction of LADBS. LADBS shall

periodically monitor construction activities to ensure compliance until issuance of Certificate of Occupancy or Use of Land.

c. No Impact. A project located within two miles of a public airport or public use airport may result in a significant impact if a project would the project expose people residing or working in the project area to excessive noise levels. The nearest airport to the Project Site is the Hollywood Burbank Airport, located approximately 1.8 miles to the northeast. The Project is not located in the vicinity of a private airstrip. The Project Site does not fall into the airport land use plan area, Influence Areas, or 65 dBA CNEL noise contour of the Hollywood Burbank Airport.[74,75] Therefore, the impact of existing aircraft noise on the Project Site would not exceed the conditionally acceptable limit of 75 dBA CNEL or the 65 dBA CNEL normally acceptable limit for office and industrial land uses and the Project would not result in the exposure of residents or those working in the area to excessive noise levels from a private airstrip or public airport. No impact would occur.

Mitigation Measures: No mitigation measures are required.

[74] Los Angeles County Department of Regional Planning, Airport Land Use Commission, Airport Influence Area, Burbank/Glendale/Pasadena Airport, Accessed on February 19, 2020 at: http://planning.lacounty.gov/assets/upl/project/aluc_airport-burbank.pdf.

[75] Burbank-Glendale-Pasadena Airport Authority, Quarterly Noise Monitoring at Hollywood Burbank Airport First Quarter 2020, July 2020. Accessed August 24, 2020 at: http://hollywoodburbankairport.com/noise-environment/noise-monitoring.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XIV. 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?	☐	☐	☐	☒

Impact Analysis

a. Less than Significant Impact. A significant impact may occur if a project would induce substantial unplanned population growth in an area, either directly or indirectly. The Southern California Association of Governments forecasts population and employment growth in member jurisdictions. Forecasts for population and employment growth from the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy for the City are shown in **Table XIV-1, Population and Employment Growth Forecast**.

Table XIV-1
Population and Employment Growth Forecast

Year	City Population	City Employment
2012	3,845,500	1,690,400
2040	4,609,400	2,169,100
Net Growth	763,900	478,700
Source: Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, Current Demographics & Growth Forecast Appendix, Table 11, Jurisdictional Forecast for 2040.		

As shown in Table XIV-1, Southern California Association of Governments forecasts City population and employment to increase from 2012 to 2040 by 763,900 people and 478,700 jobs. As the Project would replace an existing light industrial building for the primary use of the storage of household goods, the Project would not introduce unplanned population growth. The Project would not generate a residential population and would therefore not directly induce unplanned population growth. The Project Site is served by existing infrastructure including streets, water, wastewater, gas, electricity, and stormwater, therefore, the Project would not result in indirect substantial unplanned population growth. Therefore, the Project would have less than significant impacts associated with population growth.

Mitigation Measures: No mitigation measures are required.

b. No Impact. A significant impact may occur if a project would result in the displacement of existing housing units or people, necessitating the construction of replacement housing elsewhere. As the existing light industrial building contains no residences or residents and the Project proposes no

residential development, the Project would not displace persons or housing or necessitate the construction of replacement housing elsewhere. Therefore, the Project would have no impact.

Mitigation Measures: No mitigation measures are required.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XV. PUBLIC SERVICES.				
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
a. Fire protection?	☐	☐	☒	☐
b. Police protection?	☐	☐	☒	☐
c. Schools?	☐	☐	☐	☒
d. Parks?	☐	☐	☐	☒
e. Other public facilities?	☐	☐	☐	☒

Impact Analysis

a. Less than Significant Impact. A project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service, the construction of which could cause significant environmental impacts. The Los Angeles Fire Department generally considers fire protection services to be adequate if a project is within the maximum response distance for the land use proposed. Pursuant to the LAMC, the maximum response distance between industrial and commercial neighborhoods and a Los Angeles Fire Department fire station that houses an engine company is one mile and 1.5 miles for a fire station that houses a truck company.[76]

Existing Los Angeles Fire Department stations in the vicinity would serve the Project. The Project Site is located within the Valley Bureau and Battalion 14.[77] The nearest fire station is Los Angeles Fire Department Station No. 60, located at 5320 Tujunga Avenue,[78] approximately 0.7 driving miles southwest of the Project Site. LAFD Fire Station No. 60 is located less than the desired maximum of one mile from the Project Site and therefore is in sufficient proximity to serve the Project. Other Los Angeles Fire Department stations in the vicinity and approximate distances include Station No. 86 (1.5 miles) and Station No. 102 (3.1 miles). Through the City plan check process, the Project would submit plans to the Los Angeles Fire Department for review and approval of fire prevention and safety features, including design features such as adequate driveway widths and access to the building, fire flow pressure, and fire hydrant placement. Based on the distance from the Project Site to existing fire stations, the Project would not require new or physically expanded fire stations, potential impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

[76] Los Angeles Municipal Code, Article 7 Fire Code, Section 57.507.3.3. LAND USE, Table 57.507.3.3.
[77] City of Los Angeles, ZIMAS, Accessed on February 11, 2020 at: http://zimas.lacity.org/.
[78] LAFD, Find Your Station, Accessed on February 11, 2020 at: https://www.lafd.org/fire-stations/station-results.

b. Less than Significant Impact. A project would normally have a significant impact if it requires new or expanded police station facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times or other performance objectives for police protection. The Project Site is located within the North Hollywood Community division of the Los Angeles Police Department Valley Bureau. The North Hollywood Community Police Station is located approximately 1.1 driving miles west of the Project Site and serves the neighborhood of North Hollywood.[79] Los Angeles Police Department prioritizes emergency calls for police assistance based on the nature of the call. Unlike fire protection services, police units are most often in a mobile state; hence, the distance between a headquarters facility and the location of a particular emergency does not generally determine response times. Instead, the number of police officers on the street is more directly related to the realized response time.

The construction site could attract trespassers or vandals affecting public safety. Construction is temporary. Temporary impacts would not require the construction or expansion of police facilities to serve the site or maintain service response times, as the Project Site would be monitored during routine patrols. The LAMC requires the placement of temporary walls surrounding vacant lots and requires the Applicant to maintain the temporary construction wall free from graffiti (Chapter 1, Section. 14.4.17). Compliance with LAMC regulatory requirements would reduce temporary impacts to police services to less than significant.

Once operational, the Project would not introduce new residents and would replace an existing light industrial building. Therefore, the Project would not result in a substantial increase in the Los Angeles Police Department service area population such that new or physically altered police facilities would be needed to maintain performance objectives. Permanent impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

c. No Impact. A significant impact may occur if a project includes substantial employment or population growth, which could generate a demand for school facilities exceeding the capacity of the Los Angeles Unified School District. By replacing an existing industrial building, the Project would not introduce a new residential population and the associated generation of school-aged children. As the Project would not generate additional students, the Project would not generate a demand for school facilities that would exceed the capacity of Los Angeles Unified School District schools; therefore, the Project would not result in a need for new or improved facilities that would create a physical impact on the environment. The Project would have no impact pertaining to schools.

Mitigation Measures: No mitigation measures are required.

d. No Impact. A significant impact would occur if the recreation and park services available could not accommodate a project-related population increase and a project resulted in the construction of new recreation and park facilities that create significant environmental impacts. The City Department of Recreation and Parks provides existing facilities for recreation in the Project area. Potential impacts to recreational facilities are also discussed in Section XV., Recreation. As the Project would not introduce a new residential population and would replace an existing light industrial building, the Project would not result in a substantial increase in park usage such that new or physically expanded park facilities would be needed. Therefore, the Project would have no impact pertaining to park and recreation facilities.

[79] LAPD, North Hollywood Community Police Station, Accessed on February 11, 2020 at: http://www.lapdonline.org/north_hollywood_community_police_station.

Mitigation Measures: No mitigation measures are required.

e. No Impact. Other public services in the Project vicinity include Los Angeles Public Library facilities. The North Hollywood Amelia Earhart Regional Library is 0.8 driving miles southwest of the proposed Project Site, located at 5211 Tujunga Avenue.[80] As the Project would not introduce a new residential population and would replace an existing light industrial building, the Project would not generate a volume of demand on existing library services that would necessitate the construction of new or physically expanded Los Angeles Public Library facilities. Given the scope and location, the Project would have no impact regarding the need for new or physically expanded Los Angeles Public Library facilities, including the local North Hollywood Amelia Earhart Regional Library.

Mitigation Measures: No mitigation measures are required.

[80] Los Angeles Public Library, North Hollywood Amelia Earhart Regional Library, Accessed on February 21, 2020 at: https://www.lapl.org/branches/north-hollywood.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XVI. 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?	☐	☐	☐	☒

Impact Analysis

a. No Impact. A significant impact may occur if a project includes substantial employment or population growth, which would 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. The City Department of Recreation and Parks provides existing facilities within two miles of the Project Site including the North Hollywood Pool, Whitnall Off-Leash Dog Park, North Hollywood Recreation Center, North Hollywood Skate Park, Dave Potell Memorial Sports facility, Tiara Street Park, Valley Village Park, Victory Vineland Recreation Center, Woodbridge Park, and North Weddington Recreation Center.[81] As the Project would replace an existing light industrial building and would not introduce a new residential population, the Project would not result in a substantial increase in park usage such that substantial physical deterioration of the facility would occur or be accelerated. Therefore, the Project would have no impact pertaining to park and recreation facilities.

Mitigation Measures: No mitigation measures are required.

b. No Impact. A significant impact may occur if a project includes the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment. As discussed in response to Checklist Question XVI.a., the Project would not introduce a new residential population and would replace an existing light industrial building. The Project would not require the construction or physical expansion of existing recreational facilities and therefore, the Project would have no impact.

Mitigation Measures: No mitigation measures are required.

[81] City of Los Angeles Department of Recreation and Parks, Facility Map Locator, Accessed on February 21, 2020 at: https://www.laparks.org/parks.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XVII. TRANSPORTATION. Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☐	☒
b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☒	☐	☐
c. Substantially increase hazards 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?	☐	☐	☒	☐

Impact Analysis

The following analysis is based on the Transportation Assessment for the Artist Office Suites & Self-Storage Mixed-Use Project (Transportation Assessment) conducted by Overland Traffic Consultants, dated August 2020 and provided in **Appendix H.** A Los Angeles Department of Transportation (LADOT) review letter dated September 30, 2020, is also included in Appendix H.

a. No Impact. A significant impact may occur if a project would conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. The Project Site is accessible by pedestrian travel, bicycle, and public transit, as well as by vehicles. The Los Angeles County Metropolitan Transportation Authority (Metro) operates the North Hollywood G (formerly Orange)/B (formerly Red) Line Station located along Chandler Boulevard at Lankershim Boulevard approximately 0.38 miles southwest of the Project Site. A Metro Line 152 bus stop is located at Vineland Avenue/Chandler Boulevard approximately 400 feet to the south of the Project Site. Chandler Boulevard, from Lankershim Boulevard to the eastern City limit, is identified as a part of the Bicycle Enhanced Network, and Lankershim Boulevard is a Tier 1 roadway for a protected bicycle lane that is located within the Project vicinity. The Project also provides short-term and long-term bicycle parking spaces, as required by the LAMC. The Project would also provide five-foot dedications along the Vineland Avenue and Cleon Avenue frontage between the Project Site and the street to improve pedestrian access.

The Transportation Assessment Guidelines (TAG) prepared by LADOT establish the primary regulatory framework for determining if a project would conflict with applicable programs, plans, ordinances, and policies addressing the circulation system.[82] Consistent with the TAG, the Transportation Assessment was prepared to analyze the transportation impacts of the Projects, including an evaluation of the Project for consistency with a regulatory framework that consists of fifteen adopted plans, ordinances, or other standards and guidelines that address the transportation and circulation system, including the Los Angeles

[82] LADOT, Transportation Assessment Guidelines, July 2020.

Mobility Plan 2035, the Plan for Healthy LA, and the Land Use Element of the General Plan, which is comprised of 35 community plans. Please refer to Appendix F of the Transportation Assessment for the complete list of applicable plans as well as for additional detail regarding Project consistency with these plans (see "Questions to Determine Project Applicability to Plans, Policies and Programs"). The Transportation Assessment determined that the Project is consistent with the City's transportation plans and policies for all travel modes, including transit, roadway, bicycle and pedestrian facilities. Therefore, the Project would result in no impact regarding conflicts with a program, plan, ordinance or policy addressing the circulation system.

Mitigation Measures: No mitigation measures are required.

b. Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if a project would conflict or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b). The intent of this threshold is to assess whether a land use project causes substantial vehicle miles traveled (VMT). LADOT has developed threshold criteria to determine the significance of VMT impacts for development projects for each of the seven (7) City Area Planning Commission (APC) sub-areas within the City. The threshold criteria relate to household VMT per capita and work VMT per employee. A development project will have a potential impact if a project would generate VMT exceeding 15% below the existing average VMT for the APC in which a project is located. The Project is located within the South Valley APC sub-area, which limits daily household VMT per capita to a threshold of 9.4 and a daily work VMT per employee threshold of 11.6.

The Transportation Assessment's VMT calculation for the proposed Project shows a daily household VMT per capita value of 0.0, which is below the South Valley threshold value of 9.4, because the Project does not include residential uses, and a work VMT of 13.1, which is above the South Valley threshold of 11.6. Although the Project would have no residential VMT impact, the work VMT impact would be potentially significant unless mitigation is incorporated. Implementation of mitigation measure **17-1** would reduce work VMT impacts to less than significant through implementation of Transportation Demand Management (TDM) strategies. The TDM strategies required by TRA-1 consist of an employee transit subsidy and educational tools to inform employees about transportation options. Implementation of mitigation measure 17-1 would reduce work VMT to 11.6, resulting in a less than significant impact related to an inconsistency with CEQA Guidelines section 15064.3 subdivision (b).

Mitigation Measures:

17-1 To reduce the transportation impact of the Project, the Applicant or Project Proponent shall implement the following Transportation Demand Management (TDM) strategies:

Transit – The Applicant or Project Proponent shall proactively offer thirty percent of employees a transit subsidy of $2.98 per passenger per day at least once annually for a minimum of five years.

Education and Encouragement – On an ongoing basis, the Applicant or Project Proponent shall provide all employees with marketing and promotional tools to educate and inform drivers about site-specific transportation options and the effects of their travel choices.

c. Less Than Significant Impact. A significant impact may occur if a project substantially increases hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). Impacts from increasing hazards due to a geometric design feature generally relate to the design of access points to and from a project site and may include safety,

operational, or capacity impacts. Impacts can be related to vehicle, bicycle, or pedestrian conflicts, as well as to operational delays caused by vehicles slowing and/or queuing to access a project site.

As a regulatory requirement, construction activity is required to take place between 7:00 AM to 9:00 PM on weekdays, 8:00 AM to 6:00 PM on Saturdays and national holidays and no construction on Sundays (LAMC Section 41.40). Therefore, construction workers would typically arrive at the Project Site shortly before 7:00 AM, outside the weekday peak morning hour, and depart after the weekday peak evening hours of 4:00 to 6:00 PM. Further, as set forth in project design feature (PDF-1), truck hauling shall be limited to off-peak hours. Therefore, no significant levels of construction worker and/or truck traffic are expected on the street system during peak hours. The Construction Traffic Management Program required by PDF-1 shall also include the use of flagmen or other means to control traffic movement during the ingress and egress of trucks and heavy equipment, as necessary. Safe pedestrian and bicycle circulation paths adjacent to or around the work areas shall be provided by detours or protective barriers, as necessary. The Applicant shall be required to submit the Construction Traffic Management Program or Work Area Traffic Control Plans for review and approval by the City prior to the issuance of grading and construction permits. Construction impacts would be less than significant.

During operations, vehicular access would be provided in the same location as two existing driveways along Vineland Avenue and Cleon Avenue. The Project proposes only minor modifications to the existing driveways, and no new driveways will be added. An existing two-way left turn lane on Vineland Avenue along the Project frontage would facilitate left turns in and out of the site. The on-site loading docks are proposed along the south side of the building to facilitate the movement of goods in and out of the facility. The portion of Vineland Boulevard fronting the Project Site is wide, with two travel lanes and clear visibility of oncoming vehicles. The Transportation Assessment identified no Project access and circulation constraints or deficiencies, concluding that trips generated by the Project would not contribute to unacceptable queuing on or along driveways. Therefore, the Project would not substantially increase hazards due to a design feature and impacts during operations would be less than significant.

Mitigation Measures: No mitigation measures are required.

d. Less than Significant Impact. A significant impact may occur if a project would result in inadequate emergency access. The Project Site is accessible to emergency vehicles by multiple existing freeways and surface streets in the Project vicinity. Emergency vehicles would access the urban in-fill site by two existing driveways connected to Vineland Avenue and Cleon Avenue. An existing two-way left turn lane on Vineland Avenue along the Project frontage facilitates left turns in and out of the Project Site. A Construction Traffic Management Program shall be implemented during the construction phase to minimize the temporary impact of construction on emergency access. The Project represents in-fill development on a previously-developed site. The Project would not cause permanent alterations to vehicular circulation routes and patterns, nor would it impede public access or travel upon public rights-of-way. Therefore, the Project would not physically impact a designated emergency response or evacuation route or otherwise impede emergency access. Furthermore, through the plan check process, the Fire Department will review the proposed site plan to ensure the project provides adequate access for emergency vehicles in compliance with applicable Fire Code requirements. Therefore, impacts related to emergency access would be less than significant.

Mitigation Measures: No mitigation measures are required.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XVIII. TRIBAL CULTURAL RESOURCES. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?	☐	☒	☐	☐
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

Impact Analysis

This analysis is based on a Phase I Cultural Resource Assessment, prepared by Envicom Corporation, dated January 17, 2020, and provided in **Appendix D**. The Tribal Notification Letter, dated June 19, 2020, and Assembly Bill (AB) 52 Completion of Consultation letter dated October 8, 2020, are provided in **Appendix I.**

a. Potentially Significant Unless Mitigation Incorporated. A significant impact would occur if a project would cause a substantial adverse change in the significance of a tribal cultural resource as defined in PRC Section 21074 listed, or eligible for listing, in the California Register of Historical Resources, or in a local register of historical resources. As mentioned in Section V., Cultural Resources, in response to checklist question V.a., the site is improved and does not contain historical resources.

The results of the NAHC record searches were negative for cultural resources within the study area. In addition, the site is not listed in the National Register of Historic Places or California Register of Historical Resources as defined in Public Resources Code section 5020.1(k) or SurveyLA. The Project

Site is not located within, or designated as, a Historic Cultural Monument, a historic district, or other historic overlay zone.[83]

Examination of USGS maps, aerial images, and satellite images indicated that the Subject Property could contain subsurface cultural resources dating to prior to the 1940s. Therefore, the Project is located within an area the Phase I Cultural Resource Assessment considered sensitive for potential cultural resources. Mitigation measures are provided to reduce the impact of ground-disturbing activities on any potential cultural resources. Mitigation Measure 5-1 requires archaeological monitoring, during removal of asphalt and above-ground structures and grading to bedrock, and Mitigation Measure 5-2 establishes a discovery protocol if potentially significant intact deposits are encountered during excavation. Implementation of Mitigation Measures 5-1 and 5-2 would reduce impacts on potentially present cultural resources to less than significant.

Mitigation Measures: Mitigation Measures **5-1** and **5-2** shall apply.

b. Potentially Significant Unless Mitigation Incorporated. A significant impact would occur if a project would cause a substantial adverse change in the significance of a tribal cultural resource as defined in PRC Section 21074 determined by the lead agency, in its discretion and supported by substantial evidence, to be significant. The Phase I Cultural Resources Assessment found no significant cultural resources in the SCCIC and NAHC record searches, on a pedestrian walkthrough, or on historic maps and images. As the project area is not considered sensitive for cultural resources based on the Phase I Cultural Resources Assessment, it is unlikely a resource of tribal cultural value as determined by the lead agency would be found.

California AB 52 established a formal consultation process for California Native American tribes traditionally and culturally affiliated with a geographic area to identify potential significant impacts to tribal cultural resources, as defined in PRC Section 21074, as part of the CEQA process. As specified in PRC Section 21080.3.1, lead agencies must provide notice inviting consultation to California Native American tribes traditionally and culturally affiliated with the geographic area of a proposed project if a tribe has submitted a request in writing to be notified of proposed projects within 30 days of the AB 52 notice.

In compliance with AB 52, the City provided notice to 11 tribes on June 19, 2020, soliciting requests for consultation. The tribal notification letter, provided in Appendix I, described the Project and informed California Native American Tribes they have 30 calendar days from receipt of this letter to notify the City in writing if they want to consult. Consultation can be ongoing throughout the CEQA process.[84] Two tribe(s) requested consultation within 30 calendar days of the notification letter: the Gabrieleño Band of Mission Indians – Kizh Nation (Gabrieleño or Tribe) and the Fernandeño Tataviam Band of Mission Indians (Tataviam). The City consulted with the Gabrieleño on August 19, 2020, and the Tataviam on September 1, 2020. During consultation with the Tataviam, the Tataviam clarified that there will be no need for further consultation seeing as a mitigation measure requiring an alcohological monitor was already determined to be necessary. During consultation with the Gabrieleño, the Tribe stated that they would be providing evidence indicating that a tribal monitor would be necessary. On September 18, 2020, the Tribe provided planning staff with confidential evidence indicating that there would be potential for

[83] SurveyLA, Historic Resources Survey Report, North Hollywood-Valley Village Community Plan Area, February 26, 2013, Accessed on February 10, 2020 at: https://planning.lacity.org/odocument/c423999b-e386-40d3-abe3-325022c47fce/NHL_Report_Final_2.26.13.pdf.

[84] State of California, Governor's Office of Planning and Research, Technical Advisory, AB-52 and Tribal Cultural Resources in CEQA, June 2017, pg. 8.

discovery of Tribal Cultural Resources at the site given historic Tribal presence in the general area. On October 8, 2020, Planning replied to the Tribe confirming that a Mitigation Measure for a tribal monitor would be included, provided the language that would be included in the Mitigation Measure, and concluded consultation with the Gabrieleño Tribe.

Given the Project proposes subsurface excavation for a basement, ground disturbing activities would disturb native soil and could result in the inadvertent discovery of a tribal cultural resource. Implementation of mitigation measure **18-1** would reduce impacts resulting from the inadvertent discovery of potential tribal cultural resources to less than significant by requiring monitoring and establishing a discovery protocol if ground-disturbing activities encounter tribal cultural resources.

Mitigation Measure:

18-1 Prior to commencing any ground disturbance activities at the Project Site, the Applicant, or its successor, shall retain archeological monitors and tribal monitors that are qualified to identify subsurface tribal cultural resources. Ground disturbance activities shall include excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil or a similar activity at the project site. Any qualified tribal monitor(s) shall be approved by the Gabrieleno Band of Mission Indians - Kizh Nation. Any qualified archaeological monitor(s) shall be approved by the Department of City Planning, Office of Historic Resources ("OHR"). The qualified archeological and tribal monitors shall observe all ground disturbance activities on the project site at all times the ground disturbance activities are taking place. If ground disturbance activities are simultaneously occurring at multiple locations on the project site, an archeological and tribal monitor shall be assigned to each location where the ground disturbance activities are occurring. The on-site monitoring shall end when the ground disturbing activities are completed, or when the archaeological and tribal monitor both indicate that the site has a low potential for impacting tribal cultural resources. Prior to commencing any ground disturbance activities, the archaeological monitor in consultation with the tribal monitor, shall provide Worker Environmental Awareness Program (WEAP) training to construction crews involved in ground disturbance activities that provides information on regulatory requirements for the protection of tribal cultural resources. As part of the WEAP training, construction crews shall be briefed on proper procedures to follow should a crew member discover tribal cultural resources during ground disturbance activities. In addition, workers will be shown examples of the types of resources that would require notification of the archaeological monitor and tribal monitor. The Applicant shall maintain on the Project Site, for City inspection, documentation establishing the training was completed for all members of the construction crew involved in ground disturbance activities. In the event that any subsurface objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities, all such activities shall temporarily cease within the area of discovery, the radius of which shall be determined by a qualified archeologist, in consultation with a qualified tribal monitor, until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below:

1. Upon a discovery of a potential tribal cultural resource, the Applicant, or its successor, shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project; (2) and OHR.

2. If OHR determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be a tribal cultural resource in its discretion and supported by substantial evidence, the City shall provide any affected tribe a reasonable period of time, not less than 14

days, to conduct a site visit and make recommendations to the Applicant, or its successor, and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.

3. The Applicant, or its successor, shall implement the tribe's recommendations if a qualified archaeologist retained by the City and paid for by the Applicant, or its successor, in consultation with the tribal monitor, reasonably conclude that the tribe's recommendations are reasonable and feasible.

4. In addition to any recommendations from the applicable tribe(s), a qualified archeologist shall develop a list of actions that shall be taken to avoid or minimize impacts to the identified tribal cultural resources substantially consistent with best practices identified by the Native American Heritage Commission and in compliance with any applicable federal, state or local law, rule or regulation.

5. If the Applicant, or its successor, does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist or qualified tribal monitor, the Applicant, or its successor, may request mediation by a mediator agreed to by the Applicant, or its successor, and the City. The mediator must have the requisite professional qualifications and experience to mediate such a dispute. The City shall make the determination as to whether the mediator is at least minimally qualified to mediate the dispute. After making a reasonable effort to mediate this particular dispute, the City may (1) require the recommendation be implemented as originally proposed by the archaeologist or tribal monitor; (2) require the recommendation, as modified by the City, be implemented as it is at least as equally effective to mitigate a potentially significant impact; (3) require a substitute recommendation be implemented that is at least as equally effective to mitigate a potentially significant impact to a tribal cultural resource; or (4) not require the recommendation be implemented because it is not necessary to mitigate an significant impacts to tribal cultural resources. The Applicant, or its successor, shall pay all costs and fees associated with the mediation.

6. The Applicant, or its successor, may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by both the qualified archaeologist and qualified tribal monitor and determined to be reasonable and appropriate.

7. The Applicant, or its successor, may recommence ground disturbance activities inside of the specified radius of the discovery site only after it has complied with all of the recommendations developed and approved pursuant to the process set forth in paragraphs 2 through 5 above.

8. Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton and to the Native American Heritage Commission for inclusion in its Sacred Lands File.

9. Notwithstanding paragraph 8 above, any information that the Department of City Planning, in consultation with the City Attorney's Office, determines to be confidential in nature shall be excluded from submission to the SCCIC or provided to the public under the applicable provisions of the California Public Records Act, California Public Resources Code, section 6254(r), and handled in compliance with the City's AB 52 Confidentiality Protocols.

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	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XIX. 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 wastewater treatment provider, which serves or may serve the project, that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e. Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Impact Analysis

a. Less than Significant Impact. A significant impact may occur if a project would require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects. The Project would generate water, wastewater, and stormwater typical of light industrial uses in compliance with applicable federal, state, and local laws, statutes, and ordinances. As in-fill development, the Project would be served by the same public utilities infrastructure currently serving the existing land use on the Project Site; therefore, the Project would not result in the relocation or substantial expansion of that infrastructure, resulting in a less than significant impact.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact. A significant impact would occur if a project did not have sufficient water supplies available to serve a project and reasonably foreseeable future development during normal, dry, and multiple dry years. The Los Angeles Department of Water and Power would serve as the potable water purveyor to the Project Site. The Los Angeles Department of Water and Power

supplies water through an extensive distribution system, comprising 7,337 miles of distribution pipes, 119 storage tanks, and a total storage capacity of 315,245 acre-feet.[85] According to the 2015 Urban Water Management Plan, the Los Angeles Department of Water and Power has sufficient water supplies available for average weather years through the Year 2040 with existing passive conservation, as well as for dry and multiple dry years. Water supplies for 2020 for an average weather year are projected by the Urban Water Management Plan to be 611,800 acre-feet per year (AFY).[86] The Project would remove an existing light industrial building with 4,277 SF of floor area and construct and operate an approximately 150,000 gross SF self-storage and artist studio mixed-use building, thus the Project's water usage would not be entirely new. Based on these characteristics, water demand is provided in **Table XIX-1, Project Water Demand**.

Table XIX-1
Project Water Demand

Type of Use	Size or Units	Demand Rate [(a)]	Water Demand (gpd) [(b)]
Proposed			
Office/Artist Studio	15,120 SF	180 gpd/1,000 SF [(c)]	2,721.6
Self-Storage	134,140 SF	24 gpd/1,000 SF [(d)]	3,219.4
Rental Office	740 SF	24 gpd/1,000 SF [(d)]	17.8
Total Proposed Water Generation			**5,958.8**
Existing to be Removed			
Industrial Building	4,277 SF	180 gpd/1,000 SF [(e)]	769.9
		Total Existing Water Generation	**769.9**
		Total Net Water Generation	**5,188.9**

[(a)] City of Los Angeles, CEQA Thresholds Guide (2006), Exhibit M.2-12. Water demand assumed to be 120% of wastewater generation.
[(b)] gpd = gallons per day
[(c)] "Office Building" generation factor.
[(b)] "Storage: Self Storage Building" generation factor.
[(b)] "Office Building" generation factor.

As shown in Table XIX-1, the net increase in water demand resulting from the Project would be 5,188.9 gallons per day (gpd), or 5.81 AFY, a small fraction of one percent (i.e., 0.00095 percent) of the Los Angeles Department of Water and Power's projected water demand for the Year 2020. The Project would comply with required Green Building Code requirements for water conservation, such as water saving/low flow fixtures and drought tolerant planting. Additionally, the Green New Deal was released in 2019 establishing water reduction targets such as sourcing 70% of the City's water locally by 2035, reducing potable water use per capita by 22.5 percent by 2025 and installing hydration stations at 200 sites by 2035. Based on the availability of water supplies indicated in the Urban Water Management Plan, the Los Angeles Department of Water and Power would have sufficient water supply to serve the Project and reasonably foreseeable future development. The Project would have a less than significant impact.

Mitigation Measures: No mitigation measures are required.

c. Less than Significant Impact. A significant impact would occur if a project would result in a determination by the wastewater treatment provider, which serves or may serve a project, that it does not have adequate capacity to serve a project's projected demand in addition to the provider's existing commitments. LA Sanitation would serve the Project and operates more than 6,700 miles of public sewers

[85] LADWP, Facts and Figures, Accessed on February 14, 2020 at: www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water.
[86] LADWP, Urban Water Management Plan, 2015.

that convey about 400 million gallons per day (mgd) of flow from residences and businesses to the City's four wastewater treatment and water reclamation plants.[87] Wastewater generated from the Project Site would be conveyed to the Hyperion Treatment Plant. Currently an average wastewater flow rate of nearly 275 mgd is generated in the system. The Hyperion Treatment Plant has the capacity to treat 450 mgd, and therefore has excess capacity of approximately 175 mgd.[88]

Existing sewer infrastructure would serve the Project, as existing laterals connect to existing wyes, short pipes with adjoining branches, that feed into the main line (Pipe ID 4271016942710175A11) on Vineland Avenue maintained by the City Department of Public Works.[89] The estimated amount of wastewater the Project would generate is provided in **Table XIX-2, Project Wastewater Generation**.

Table XIX-2
Project Wastewater Generation

Type of Use	Size or Units	Demand Rate [(a)]	Water Demand (gpd) [(b)]
Proposed			
Office/Artist Studio	15,120 SF	150 gpd/1,000 SF [(c)]	2,268.0
Self-Storage	134,140 SF	20 gpd/1,000 SF [(d)]	2,682.8
Rental Office	740 SF	20 gpd/1,000 SF [(d)]	14.8
Total Proposed Wastewater Generation			**4,965.6**
Existing to be Removed			
Industrial Building	4,277 SF	150 gpd/1,000 SF [(e)]	641.6
Total Existing Wastewater Generation			641.6
Total Net Wastewater Generation			**4,324**

[(a)] City of Los Angeles CEQA Thresholds Guide (2006), Exhibit M.2-12, Sewage Generation Factors.
[(b)] gpd = gallons per day
[(c)] Utilized "Office Building" generation factor.
[(b)] Utilized "Storage: Self Storage Building" generation factor.
[(b)] Utilized "Office Building" generation factor.

As shown in Table XIX-2, Project Wastewater Generation, the net increase in wastewater generation would be 4,324 gpd, a small fraction of one percent (i.e. 0.002 percent) of the excess treatment capacity at Hyperion Treatment Plant. In accordance with the City Sewer Allocation Ordinance (No. 166060), LA Sanitation does not determine sewer capacity until the Los Angeles Department of Building and Safety has established that a project's plans and specifications are acceptable for plan check. This process ensures that the system can accept the anticipated wastewater flows from a project at the time of connection, as opposed to prematurely committing to projects that are in the environmental review or entitlement process. However, based on estimated wastewater generation from the existing sewer infrastructure, Hyperion Water Reclamation Plant would have sufficient capacity for the Project in addition to the provider's existing commitments, and the Project demand is a small percentage of the remaining capacity. Therefore, the Project impact would be less than significant.

[87] LA Sanitation, Sewers, Accessed on February 14, 2020 at: https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-s?_adf.ctrl-state=101rkaq8yo_5&_afrLoop=1945382053351572#!.
[88] LA Sanitation, Hyperion Water Reclamation Plant, Accessed on February 14, 2020 at: https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-hwrp?_afrLoop=4620187089132463&_afrWindowMode=0&_afrWindowId=1cb3ng6uon_139#!%40%40%3F_afrWindowId%3D1cb3ng6uon_139%26_afrLoop%3D4620187089132463%26_afrWindowMode%3D0%26_adf.ctrl-state%3D1cb3ng6uon_339.
[89] Navigate LA, Accessed on March 4, 2020 at: https://navigatela.lacity.org/navigatela/.

Mitigation Measures: No mitigation measures are required.

d. Less than Significant Impact. A significant impact may occur if a project were to increase solid waste generation to a such a degree that the existing and projected landfill capacity would be insufficient to accommodate the additional solid waste. Solid waste generated within the City is recycled, reused, and transformed at waste-to-energy facilities or disposed of at landfills and recycling centers. The likely destination for the export is the Simi Valley Landfill and Recycling Center managed by Waste Management. The Simi Valley Landfill and Recycling Center is permitted to accept up to 6,000 tons per day (tpd) of waste accepted an average of 4,087 tpd in 2018, leaving 1,913 tpd of capacity.[90] The Simi Valley Landfill and Recycling Center accepts municipal solid waste, construction and demolition materials, clean dirt and clean asphalt and concrete.[91]

Demolition and Construction

Estimated Project-generated construction waste is provided in **Table XIX-3, Demolition and Construction Solid Waste Generation**. The Project would remove an existing light industrial building used as office space with 4,277 SF of floor area and construct a new approximately 150,000 gross SF self-storage and artist studio mixed-use building.

Table XIX-3
Demolition and Construction Solid Waste Generation

Type of Use	Size	Generation Rate	Total Waste (pounds)	Total Waste (tons)
Demolition				
Building and Parking Lot [a]				2,169
Demolition Waste Generation				2,169
Diversion of 50% for Recycling [b]				*-1,084.5*
			Demolition solid waste sub-total	**1,084.5**
Construction				
Industrial Building	150,000 SF	4.34 lbs/SF [c]	651,000	325.5
Construction Waste Generation				325.5
Diversion of 50% for Recycling [d]				*-162.8*
			Construction solid waste sub-total	**162.7**
			Total Demolition and Construction Waste for Landfill Disposal	**1,247.2**

[a] Demolition waste tonnage from CalEEMod Outputs in Appendix B.
[b] Required by LAMC, Sections 99.04.408.1 and 66.32.
[c] United States Environmental Protection Agency, Office of Resource Conservation and Recovery, Report No. EPA530-R-09-002, Estimating 2003 Building-Related Construction and Demolition Materials Amount. Table 2-2.

Project demolition and construction would generate approximately 1,247.2 tons of waste as shown in Table XIX-3. The Waste Management Act (AB 939) requires each California City and County to prepare, adopt, and submit to the California Department of Resources Recycling and Recovery (CalRecycle) a Source Reduction and Recycling Element (SRRE) that demonstrates how the jurisdiction will meet AB 939's mandated diversion goals of 50 percent. In accordance with the LAMC (Section 99.04.408.1, Construction and Demolition), the Project would require construction waste diversion of at least 50 percent in accordance with the California Green Building Standards Code (Sections 4.408 and 5.408).

[90] Los Angeles County Public Works, County of Los Angeles Countywide Integrated Waste Management Plan, 2018 Annual Report, December 2019, pg. 50.
[91] Waste Management, Simi Valley Landfill Accepted Materials, Accessed on March 4, 2020 at: https://www.wm.com/location/california/ventura-county/landfill/acceptable-materials.jsp.

Disposal of demolition waste would occur over approximately 20 days and disposal of construction waste over 200 days. Total demolition and construction waste from the Project, 1,247.2 tons, would be disposed over 250 days total or approximately five tons per day (tpd), which represents less than one percent (0.26 percent) of the 1,913 tpd of remaining permitted capacity for waste daily disposal capacity at the Simi Valley Landfill and Recycling Center. Construction waste would not exceed the daily permitted capacity of the Simi Valley Landfill and Recycling Center, resulting in a less than significant impact.

Operations

Employees of the proposed facility would generate solid waste typical of light industrial uses. Operational waste is provided in **Table XIX-4, Operational Solid Waste Generation**.

Table XIX-4
Operational Solid Waste Generation

Type of Use	# of Employees	Generation Rate (lbs/employee/day) [a]	Total Waste (lbs/day)	Total Waste (tpd)
Operations				
Artist & Makers	50 per day [b]	8.93	446.5	0.22
Self-Storage	2 per day	8.93	17.86	0.01
Artist Management Staff	1 per day	8.93	8.93	0.00
Total Operations Waste Generation			**473.3**	**0.23**
Diversion of 50% for Recycling [c]			236.7	**0.12**
Total Operational Waste for Landfill Disposal			**236.6**	**0.11**

[a] City of Los Angeles. L.A. CEQA Thresholds Guide. 2006. Industrial Solid Waste Generation, pg. M 3-2.
[b] Although the Project is expected to provide office studio space to an estimated 150 tenants, an estimated 30-50 tenants would use the studio space per day. Judith Olivia HeartSong, Founder and Executive Director, Artists & Makers Studios, email correspondence with Nimble Consulting, August 17, 2020.
[c] Required by LAMC, Section 99.04.408.1 and 66.32.

As shown in Table XIX-4, Operational Solid Waste Generation, commercial uses are estimated to generate 8.93 pounds per employee per day. Based on an estimated 50 Artist & Makers tenants and three employees per day, the Project would result in a total solid waste generation of approximately 473.3 pounds per day prior to recycling diversion. Diversion of 50 percent of the solid waste stream for recycling would result in a total of 236.7 pounds per day (0.12 tpd) to be disposed in landfills. This represents approximately 0.006 percent of the permitted daily capacity of the Simi Valley Landfill and Recycling Center. Therefore, operational solid waste impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

e. Less than Significant Impact . A significant impact may occur if a project would generate solid waste not disposed of in accordance with applicable regulations. The Project would generate solid waste typical of light manufacturing uses and would comply with applicable federal, state, and local laws, statutes, and ordinances regarding the proper disposal of solid waste. Appropriate disposal of potentially hazardous construction materials from demolition of existing structures is discussed in Section IX, Hazards and Hazardous Materials. With implementation of regulatory compliance measure 9-1, impacts would be less than significant with mitigation.

Mitigation Measures: No mitigation measures are required .

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XX. WILDFIRE. If located in or near state responsibility areas or land 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 factor, 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 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?	☐	☐	☐	☒

Impact Analysis

a-d. No Impact. The Project Site is located in an urbanized area of the City at least two miles from the nearest wildland-urban interface. The Community Plan area is developed and zoned for light industrial uses. The Project Site is not located within or near a state responsibility area (SRA)[92] or land classified as a Very High Fire Hazard Severity Zone (VHFHSZ).[93]

Existing Los Angeles Fire Department stations in the vicinity would serve the Project. In the event of a wildfire, the nearest fire station is Los Angeles Fire Department Fire Station No. 60, approximately 0.7 driving miles southwest of the Project Site. Other Los Angeles Fire Department fire stations in the vicinity and approximate distances include Station No. 86 (1.5 miles) and Station No. 102 (3.1 miles). In addition, through the City plan check process, the Project would submit plans to the Los Angeles Fire Department for review and approval of fire prevention and safety features, including design features such as adequate street widths and access to the building, fire flow pressure, and fire hydrant placement. The Project is not located within or near an SRA or VHFHSZ and therefore, the Project would have no impact regarding wildfires.

Mitigation Measures: No mitigation measures are required.

[92] Board of Forestry and Fire Protection, State Responsibility Area Viewer, Accessed on February 21, 2020 at: https://bof.fire.ca.gov/projects-and-programs/state-responsibility-area-viewer/.
[93] City of Los Angeles, ZIMAS, Accessed on February 21, 2020 at: http://zimas.lacity.org/.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XXI. MANDATORY FINDINGS OF SIGNIFICANCE.				
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, 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 an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).	☐	☒	☐	☐
c. Does the project have environmental effects that cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

Impact Analysis

a. Potentially Significant Unless Mitigation Incorporated. A significant impact could occur if a project would significantly degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, 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.

The Project Site is in an urbanized area surrounded by urban uses including a major surface street, Vineland Boulevard, and adjacent commercial and light industrial land uses. As discussed in response to section IV., Biological Resources, the Project Site was queried for nine U.S. Geological Survey 7.3-minute quadrangle regions containing and surrounding the Project Site. The California Natural Diversity Database, California Native Plant Society, and literature search results, provided in Appendix C, support the conclusion the Project Site does not provide habitat for rare or endangered plant or animal species. Therefore, the Project would not eliminate a plant or animal community or restrict the range of a plant or animal of a rare or endangered plant or animal.

As discussed Section V., Cultural Resources, search results from the South Central Coastal Information Center, Native American Heritage Commission, U.S. Geological Survey Maps, and a pedestrian survey for cultural resources on the Project Site were negative; therefore, the Project would not eliminate any

known important examples of major periods of California history or prehistory. However, the Phase I Cultural Resource Assessment concluded the Project is located within an area considered sensitive for potential, unknown cultural resources that could be encountered during ground disturbance. Implementation of Mitigation Measures 5-1 and 5-2 would reduce impacts on potentially present cultural resources to less than significant. As discussed Section XVIII., Tribal Cultural Resources, the Project provides Mitigation Measures 18-1 and 18-2 to reduce impacts resulting from the inadvertent discovery of potential tribal cultural resources to less than significant by establishing a discovery protocol and requiring consultation if ground disturbing activities encounter tribal cultural resources. Therefore, impacts to important examples of major periods of California history or prehistory would be less than significant with mitigation.

Mitigation Measures: Mitigation Measures 5-1, 5-2, 18-1, and 18-2 shall apply.

b. Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if the impacts of a proposed project, in conjunction with the impacts of related projects, would result in impacts that are less than significant when viewed separately but significant when viewed together. Although related projects identified and analyzed in the Transportation Assessment provided in Appendix H may be constructed in the Project vicinity, the cumulative transportation impacts to which the proposed Project would contribute were found to be less than significant. These related projects are provided in **Table XXI-1, Related Projects**.

Table XXI-1
Related Projects

#	Project Name	Address	Land Use Data	
			Land Use	Size
1	NoHo Lankershim Mixed-Use	5401 Lankershim Blvd	Office Retail Apartments	1,918 SF 14,500 SF 127 units
2	The Weddington Apartments	11120 Chandler Blvd	Apartments	324 units
3	NoHo Artwalk	11126 Chandler Blvd	Condominiums Retail Office Removed Retail Removed	220 units 9,400 SF (31,500) SF (2,500) SF
4	Apartments	5513 Case Avenue	Apartments	90 units
5	Apartments	11011 Otsego Street	Apartments	144 units
6	NoHo Millennium Mixed Use	5107 Lankershim Blvd	Apartments Market Office	297 units 23,733 SF 1,267 SF
7	Apartments	5508 Fulcher Avenue	Apartments	46 units
8	Apartments	11106 Hartsook Street	Apartments	61 units

Source: Overland Traffic Consultants, Inc., Transportation Assessment for Artist Office Suites & Self Storage Mixed-Use Project, August 2020.

As previously evaluated in the impact analysis following each environmental factor in the Initial Study, the impact conclusions were either "no impact," "less-than-significant," or "potentially significant unless mitigation incorporated." Although, if approved, the eight related projects shown on Table XXI-1 may be constructed in the Project vicinity, the impact of the Project in conjunction with the impact of related projects would not be cumulatively considerable. Implementation of the mitigation measures identified in Section V., Cultural Resources, VII., Geology and Soils, IX., Hazards and Hazardous Materials, XIII.,

Noise, XVII., Transportation, and XVIII. Tribal Cultural Resources would reduce cumulative impacts to less than significant.

c. Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if a proposed project has the potential to result in substantial adverse effects on human beings. As discussed in the preceding sections, all potential impacts of the Project have been identified and mitigation measures have been prescribed, where applicable, to reduce potentially significant impacts to less than significant levels. Compliance with regulatory requirements and implementation of the mitigation measures in Section V., Cultural Resources, VII., Geology and Soils, IX., Hazards and Hazardous Materials, XIII., Noise, XVII., Transportation, and XVIII. Tribal Cultural Resources would reduce substantial adverse impacts on human beings, either directly or indirectly, to less than significant.

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