ENVIRONMENTAL

# 7528 North Bellaire Avenue Mixed-Use Project

## Administrative Draft Initial Study/ Mitigated Negative Declaration

September 2025


***Lead Agency:***

**City of Los Angeles**
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**Appendices**

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# 1.0 INTRODUCTION

## 1.1 Statutory Authority and Requirements

This Initial Study has been conducted in accordance with the California Environmental Quality Act (CEQA) (California Public Resources Code [PRC] §21000 et seq.) and the State CEQA Guidelines (California Code of Regulations [CCR], Title 14, §15000 et seq.). Pursuant to State CEQA Guidelines §15063, this Initial Study has been conducted to determine if the proposed 7528 North Bellaire Avenue Mixed-Use Project ("Project") would have a significant effect on the environment. The Project site is located at 7528 North Bellaire Avenue, on an approximately 3.92-acre property (Assessor Parcel Number [APN] 2305-024-030), in the City of Los Angeles("City"). The Applicant proposes a mixed-use commercial and residential development with approximately 217,827 SF of commercial floor area (i.e., self-storage facility and office) and eight dwelling units [DU]. The Project site is currently vacant/unimproved except for one vacant single-family residential DU and various accessory structures/sheds.

The Project seeks approval of the following entitlements: Site Plan Review, General Plan Amendment, Zone Change, and Conditional Use Permit.

Pursuant to State CEQA Guidelines §15063(c), the purposes of an Initial Study are to:

- Provide the Lead Agency with information to use as the basis for deciding whether to prepare an Environmental Impact Report (EIR) or a Negative Declaration (ND);
- Enable an applicant or Lead Agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby enabling the project to qualify for an ND;
- Assist in the preparation of an EIR, if one is required;
- Facilitate environmental assessment early in the design of a project;
- Provide documentation of the factual basis for the finding in an ND that a project will not have a significant effect on the environment;
- Eliminate unnecessary EIRs; and
- Determine whether a previously prepared EIR could be used with the project.

This Initial Study is intended to be used as a decision-making tool for the Lead Agency and responsible agencies in considering and acting on the proposed Project. Responsible agencies would comply with CEQA by considering this environmental analysis for discretionary actions associated with Project implementation, if any.

State CEQA Guidelines §15063(g) specifies that as soon as a Lead Agency has determined that an Initial Study will be required for a project, the Lead Agency shall consult informally with all Responsible Agencies and all Trustee Agencies responsible for resources affected by a project to obtain their recommendations as to whether an EIR, Mitigated Negative Declaration (MND), or ND should be prepared.

## 1.2 Summary of Findings

Pursuant to State CEQA Guidelines §15367, the City, as the Lead Agency, has the authority for environmental review and adoption of the environmental documentation, in accordance with CEQA. This Initial Study has evaluated the environmental issues outlined in **Section 3.2: Environmental Factors Potentially Affected**. It provides decision-makers and the public with information concerning the Project's potential environmental effects and recommended mitigation measures, if any.

Based on the Environmental Checklist Form and supporting environmental analysis, the Project would have no impact or a less than significant impact concerning all environmental issue areas, except the following, for which the Project would have a less than significant impact with mitigation incorporated:

- Cultural Resources
- Geology and Soils
- Tribal Cultural Resources
- Utilities and Service Systems

As set forth in State CEQA Guidelines §15070, an Initial Study leading to an MND (IS/MND) can be prepared when the Initial Study identifies potentially significant effects, but (1) revisions…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.

## 1.3 Initial Study Public Review Process

The Notice of Intent (NOI) to Adopt an MND has been provided to the Clerk of the County of Los Angeles and mailed to all Responsible Agencies and Trustee Agencies concerned with the Project and other public agencies with jurisdiction by law over resources affected by the Project. A 30-day public review period has been established for the IS/MND in accordance with State CEQA Guidelines §15073. During the public review period, the IS/MND, including the Technical Appendices, was made available for review on the City website, at:

https://planning.lacity.gov/project-review/environmental-review/published-documents

In reviewing the IS/MND, affected Responsible Agencies, Trustee Agencies, and the interested public should focus on the document's adequacy in identifying and analyzing the Project's potential environmental effects and the ways in which the potentially significant effects can be avoided or mitigated. Written comments on this IS/MND may be sent to:

Los Angeles Department of City Planning
Dang Nguyen, City Planner
6262 Van Nuys Boulevard, #430
Van Nuys, CA 91401
Email: dang.nguyen@lacity.org

Following receipt and evaluation of comments from agencies, organizations, and/or individuals, the City will determine whether any substantial new environmental issues have been raised. If so, further documentation may be required. If no substantial new environmental issues have been raised or if the issues raised do not provide substantial evidence that the Project would have a significant effect on the environment, the IS/MND will be considered for adoption and the Project for approval.

## 1.4 Report Organization

This document is organized into the following sections:

**Section 1.0: Introduction** provides a Project introduction and overview, cites the State CEQA Guidelines to which the proposed Project is subject, and summarizes the IS/MND's conclusions.

**Section 2.0: Project Description** details the Project's location, environmental setting, background and history, characteristics, discretionary actions, construction program, phasing, agreements, and required permits and approvals. This Section also identifies the IS/MND's intended uses, including a list of anticipated permits and other approvals.

**Section 3.0: Environmental Checklist Form** provides the Project background and an overview of potential impacts that may or may not result from Project implementation.

**Section 4.0: Evaluation of Environmental Impacts** provides an analysis of potential environmental impacts identified in the environmental checklist.

**Section 5.0: References** identifies resources used to prepare the IS/MND.

# 2.0 PROJECT DESCRIPTION

## 2.1 Project Location

The 7528 North Bellaire Avenue Mixed-Use Project ("Project") site is in the County of Los Angeles ("County"), approximately 15 miles north of downtown Los Angeles, in the City of Los Angeles ("City"), in the Sun Valley – La Tuna Canyon Community ("Community"); see **Exhibit 2-1: Regional Vicinity Map**. The approximately 3.92-acre Project site is comprised of one parcel (APN 2305-024-030) situated northeast of the Saticoy Street at North Bellaire Avenue intersection, at 7528 North Bellaire Avenue; see **Exhibit 2-2: Local Vicinity Map**.

## 2.2 Environmental Setting

The Community encompasses approximately 17 square miles in the City's northeast quadrant. Surrounding areas include the communities of Arleta – Pacoima, and Sunland – Tujunga – Lake View Terrace – Shadow Hills – East La Tuna Canton to the north, North Hollywood to the south, the City of Burbank to the east, and Mission Hills – Panorama City - North Hills to the west. The Community contains a mix of low-density residential, open space, and industrial uses. As shown in **Exhibit 2-2**, the Project site is located in an urbanized area.

Regional access to the Project site is provided via the Hollywood Freeway (State Route [SR] 170) situated to the east. Local access to the Project site is provided by Saticoy Street situated to the south and Bellaire Avenue situated to the west.

### Existing Onsite Land Uses

As shown on **Exhibit 2-2**, the Project site is vacant/unimproved except for one vacant single-family residential DU (circa 1911, approximately 924 SF) and various accessory structures/sheds (year of construction unknown, approximately 900 SF) at the site's western portion.

### Existing Onsite General Plan Land Use and Zoning

The Los Angeles General Plan ("General Plan") includes 35 Community Plans that make up the General Plan's Land Use Element. The Project site is located in the southwestern portion of the Sun Valley – La Tuna Canyon Community Plan ("Community Plan"). The Project site's existing land use designations are listed in **Table 2-1: Existing Land Use Designations** and depicted on **Exhibit 2-3: Existing General Plan Land Use Map**. As indicated, most of the Project site is designated Commercial Manufacturing, with the remainder designated Parking Buffer and Low Residential.

**Table 2.2-1: Existing Land Use Designations**

| General Plan Designation[1] | Acres[2] |
|---|---|
| Low Residential (4 to 12 DU/net acre, 6.5 midpoint) | 0.59 |
| Commercial Manufacturing | 2.62 |
| Parking Buffer | 0.71 |
| ***Total*** | ***3.92*** |

Notes:
1. City of Los Angeles Community Planning App Sun Valley, available at: https://dcpgis.lacity.org/portal/apps/View/index.html?appid=c2368a7fdea240deba0e625dee7e29f7
2. See **Exhibit 2-3: Existing General Plan Land Use Map**.

The Project site's existing zoning is listed in **Table 2-2: Existing Zoning** and depicted on **Exhibit 2-4: Existing Zoning Map**. As indicated, most of the Project site is zoned "RA" Suburban Zone (RA-1), with only smaller

portions zoned "Tentative R1" One-Family Zone (RA-1) and "R2" Two-Family Zone (R2-1). The permitted uses, restrictions, and development standards for these zones are provided in Los Angeles Municipal Code (LAMC) §12.07, *"RA" Suburban Zone*, §12.08, *"R1" One-Family Zone*, and §12.09, *"R2" Two-Family Zone*, respectively. LAMC §12.21, *General Provisions,* specifies additional development standards.

**Table 2.2-2: Existing Zoning**

| Zone[1] | Municipal Code Section | Acres[2] |
|---|---|---|
| "RA" Suburban Zone (RA-1) | Section 12.07: Section "RA" Suburban Zone | 3.08 |
| Tentative "R1" One-Family Zone ([T]R-1) | Section 12.08: "R1" One-Family Zone | 0.59 |
| "R2" Two-Family Zone (R2-1) | Section 12.09: "R2" Two-Family Zone | 0.25 |
| | ***Total*** | ***3.92*** |

Notes:
1. City of Los Angeles Community Planning App Sun Valley, available at: https://dcpgis.lacity.org/portal/apps/View/index.html?appid=c2368a7fdea240deba0e625dee7e29f7
2. See **Exhibit 2-4: Existing Zoning Map**.

### Surrounding Land Uses

The land uses surrounding the Project site and their respective General Plan land use designations and zoning are summarized in **Table 2.2-3: Surrounding Land Uses** and depicted on **Exhibit 2-3** and **Exhibit 2-4**, respectively.

**Table 2.2-3: Surrounding Land Uses**

| Direction | Existing Land Use | General Plan Designation[1, 2] | Zoning[3, 4] |
|---|---|---|---|
| North | Single-Family Residential Uses | Low Residential | "R1" One-Family Zone (R1-1), and "RA" Suburban Zone (RA-1) |
| South | Paved Vacant Lot, Saticoy Street, Multi-Family Residential (i.e., Whitssett Tiny Home Village), and Industrial Uses | Limited Manufacturing | "R2" Two-Family Zone (R2-1), "P" Automobile Parking Zone (P-1), and "M1" Limited Industrial Zone (M1-1) |
| East | Multi-Family Residential (i.e., Whitssett Tiny Home Village) and SR 170 | Public Facilities, Medium Residential | "PF" Public Facilities Zone (PF-1XL) |
| West | Bellaire Avenue and Single-Family Residential Uses | Low Residential | "R1" One-Family Zone (R1-1) |

Notes:
1. City of Los Angeles Community Planning App Sun Valley, available at: https://dcpgis.lacity.org/portal/apps/View/index.html?appid=c2368a7fdea240deba0e625dee7e29f7
2. See **Exhibit 2-3: Existing General Plan Land Use Map**
3. City of Los Angeles, ZIMAS, available at: https://zimas.lacity.org/
4. See **Exhibit 2-4: Existing Zoning Map**

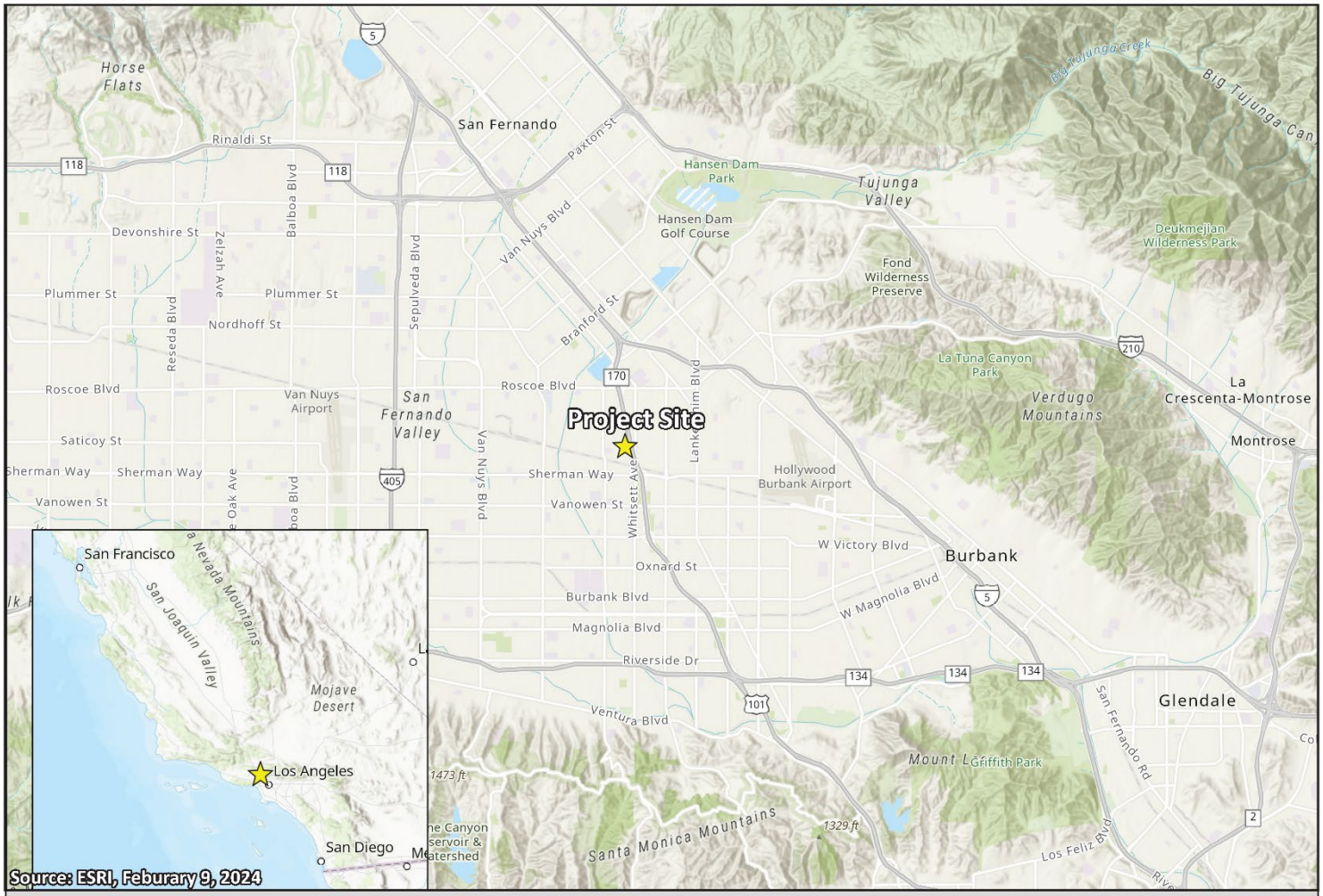


**EXHIBIT 2-1: REGIONAL VICINITY MAP**
7528 North Bellaire Mixed-Use Project

NOT TO SCALE


**EXHIBIT 2-2: LOCAL VICINITY MAP**
7528 North Bellaire Mixed-Use Project

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**EXHIBIT 2-3: EXISTING GENERAL PLAN LAND USE MAP**
7528 North Bellaire Mixed-Use Project

NOT TO SCALE

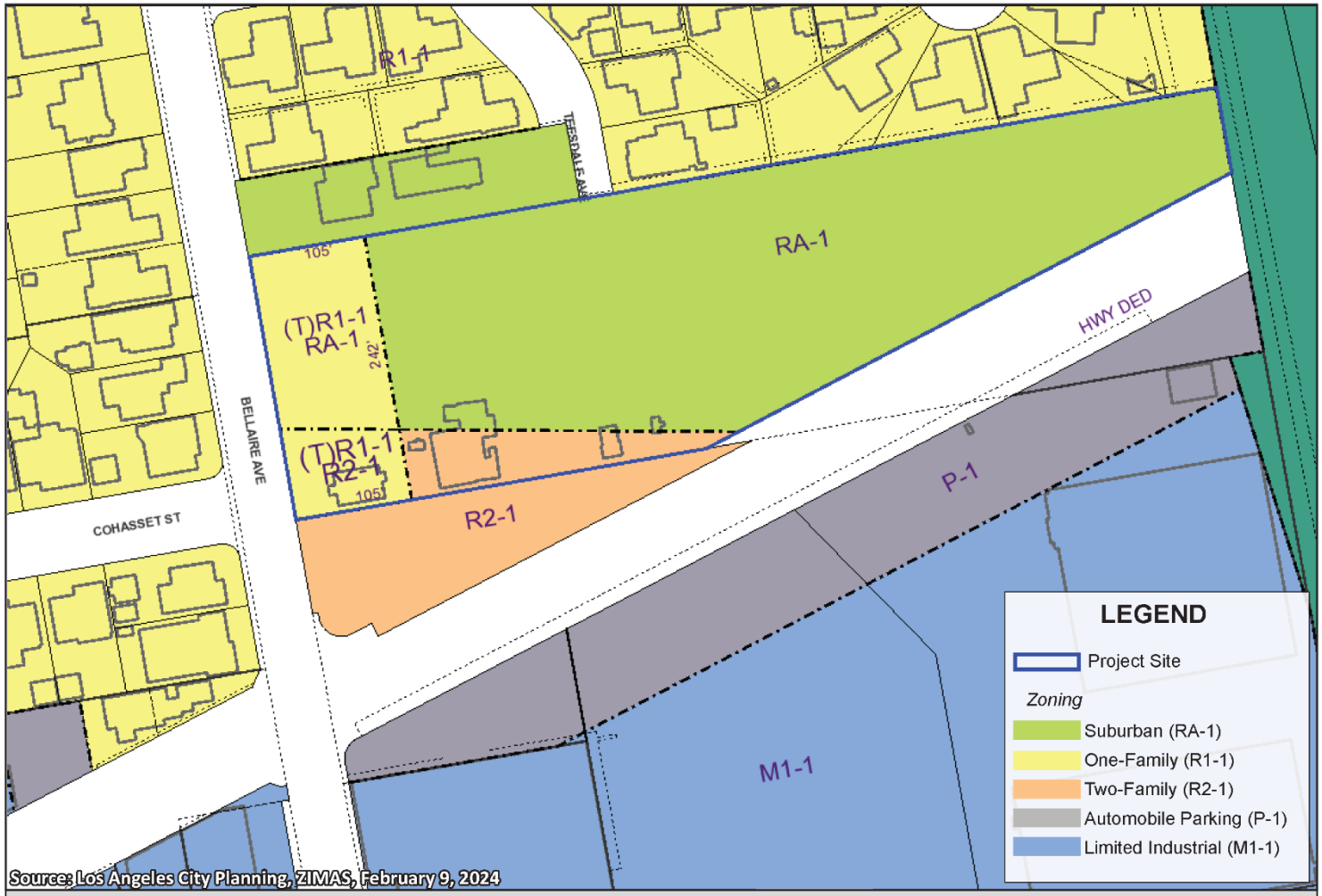



**EXHIBIT 2-4: EXISTING ZONING MAP**
7528 North Bellaire Mixed-Use Project

NOT TO SCALE

## 2.3 PROJECT CHARACTERISTICS

### Project Overview

The Applicant proposes a mixed-use (commercial and residential) development comprised of two buildings with a total gross building area of approximately 229,807 SF, approximately 217,827 SF of commercial (self-storage, 1,584 units) floor area, and approximately 11,980 SF of multi-family residential floor area (eight DU). The proposed mixed-use development is depicted on **Exhibit 2-5A: Preliminary Site Plan** and **Exhibit 2-5B: Preliminary Residential Site Plan** and summarized in **Table 2.3-1: Summary of Proposed Project**. The commercial building would be a maximum of 40 feet in height, and the residential building would be a maximum of 27 feet 4 inches in height. To accommodate the proposed development, the Project proposes to remove all existing on-site land uses and improvements.

**Table 2.3-1: Summary of Proposed Project**

| Building | Level | Self-Storage (SF) | Self-Storage (Units) | Office (SF) |
|---|---|---|---|---|
| **Commercial/ Storage: Building A1** | Level 1 | 42,630 | 307 | 692 |
| | Level 2 | 43,322 | 327 | 0 |
| | Level 3 | 43,322 | 327 | 0 |
| | **Sub-Total Building A1** | **129,275** | **961** | **692** |
| | **Total Building A1 (SF)** | **129,967** | | |
| **Commercial/ Storage Building A2** | Level 1 | 30,140 | 208 | 0 |
| | Level 2 | 30,140 | 219 | 0 |
| | Level 3 | 27,581 | 196 | 0 |
| | **Sub-Total Building A2** | **87,861** | 623 | **0** |
| | **Total Building A2 (SF)** | **87,861** | | |
| **Commercial** | **Building A Total (SF)** | **217,827** | | |
| | **Building A Total (Units)** | **1,584** | | |
| | **Floor Area Ratio** | **1.34** | | |
| **Building** | **Level** | **Residential Living (SF)** | **Residential (DU)** | **Residential Garages (SF)** |
| **Residential: Building B** | Level 1 | 0 | 0 | 5,990 |
| | Level 2 | 5,990 | 8 | 0 |
| | **Sub-Total Building B** | **5,990** | **8** | **5,990** |
| **Residential** | **Total Building B (SF)** | **11,980** | | |
| | **Total Building B (DU)** | **8** | | |
| | **Density (DU/AC)** | **2.04** | | |
| ***TOTAL PROJECT*** | ***TOTAL BUILDING SF*** | ***229,807*** | | |
| | ***COMMERCIAL SF*** | **217,827** | | |
| | ***MAX STORAGE UNITS*** | ***1,584*** | | |
| | ***RESIDENTIAL SF*** | ***11,980*** | | |
| | ***RESIDENTIAL DU*** | ***8*** | | |

Source: Jordan Architects, May 02, 2024

### Self-Storage Facility

As shown in **Exhibit 2-5A**, at the site's eastern portion, the Project proposes a self-storage facility with up to 1,584 storage units comprised of Building A1, which is a three-story, approximately 130,993 SF building with 130,274 SF of storage floor area (961 units) and 692 SF of office floor area, and Building A2, which is a three-story, approximately 87,861 SF building comprised entirely of storage floor area (623 units). As depicted in **Exhibits 2-6A through 2-6D, both buildings would have exteriors composed of corrugated metal and concrete masonry,** in addition to glazing for doors and windows. Building A would be between 38 and 40 feet in height.

The self-storage facility would provide interior storage floor area for personal and business goods- no outdoor storage is proposed. The facility's hours of operation would be from 6:00 AM to 9:00 PM daily.

### Apartment Development

As shown in **Exhibit 2-5A**, at the site's western portion, the Project proposes an eight-unit townhouse-style apartment development comprised of one two-story 11,980 SF building at a density of 2.04 DU/AC. The building would be comprised of brick veneer, corrugated metal siding, and glazing for doors and windows.

### Open Space and Landscaping

The self-storage facility would be subject to compliance with the development standards contained in LAMC §12.40, *Landscape – General Requirements*, §12.41, *Landscape – Water Management*, and §12.42, *Landscape*, which include requirements concerning a landscape point system, approvals, irrigation maintenance, mulch, energy, heat, glare, and landscape techniques.

The apartment development would be subject to compliance with the development standards contained in LAMC §12.21(G), which specify that 125 SF of open space is required for each unit having three habitable rooms. Based on this standard and eight DU, the Project would require 1,000 SF of open space. The Project proposes 3,045 SF of common open space near the proposed apartments, meeting LAMC's open space standard.

**Exhibit 2-8: Preliminary Landscape Plan** depicts the Project's proposed landscaping plan. The Project proposes 182 trees and 25,365 SF of landscaping within the Project site and along its perimeter.

### Access, Circulation, and Parking

**Exhibit 2-5A** depicts the Project's proposed access, circulation, and parking. As shown on **Exhibit 2-5A**, vehicle access to the Project site would be provided via one gated driveway on North Bellaire Avenue. For circulation, the Project proposes drive aisles along the Project site's northern boundary, west of Building A1, and south of Building B. Pedestrian access would be provided directly from the North Bellaire Avenue sidewalk.

The Project proposes a total of 92 off-street vehicle parking spaces, including 16 spaces within the apartment development's garages (two spaces per unit) and 76 surface parking spaces. Of the 76 surface parking spaces, 68 would be allocated for the self-storage facility, and 8 would be reserved for apartment development guests.

The Project also proposes 57 bicycle parking stalls (including 25 short- and 32 long-term). Twenty-four (22) short- and 22 long-term stalls would be provided for the self-storage facility, while one short- and 9 long-term stalls would be provided for the apartment development.

### Signage, Lighting, and Security

The self-storage facility would be subject to compliance with LAMC §14.4.4, *Sign Regulations – General Provisions*, LAMC §14.4.5, *Sign Regulations – Hazard to Traffic*, and LAMC §14.4.10, *Sign Regulations – Wall Signs*, which include requirements concerning approvals, sign illumination and design, and sign location; see **Exhibit 2-7: Preliminary Rendering.** All Project entries, parking areas, trash enclosures, outdoor areas, and pedestrian pathways would include dusk-to-dawn lighting for safety and security.

### Utility Infrastructure

The Project proposes new onsite utility infrastructure to serve the mixed-use development. The Project would connect these proposed utilities to existing utility infrastructure in adjacent roadways, with the final sizing and design of onsite facilities occurring during final building design and plan check.

Water and Sewer. The Los Angeles Department of Water and Power (LADWP) provides water (and electrical) services to the City's residents and businesses. The Project proposes to construct new onsite water facilities, as well as limited connections to the existing offsite/adjacent municipal water system.

The Project site's sanitary sewer system is under the jurisdiction of the City of Los Angeles Bureau of Engineering, Department of Public Works. The Project proposes to construct new onsite sewer lines, which would discharge to the existing sewer line in Bellaire Avenue.

Drainage and Water Quality. The Project would require construction of new onsite stormwater drainage facilities, as well as limited connections to existing offsite/adjacent infrastructure. The proposed improvements include on-site storm drain pipes to convey runoff to a subsurface infiltration facility. The Project's runoff would drain to ribbon gutters along the length of the site to the proposed infiltration facility. The surface grading of the site has been designed to allow runoff produced by higher-intensity storms to surface flow to the Project frontage along Bellaire Avenue without impacting the structures or improvements.

Dry Utilities and Solid Waste Management. LADWP, which provides electrical power to the Project site, operates its own municipal electric system. The Project would require construction of new onsite electric power facilities, as well as limited connections to existing offsite/adjacent infrastructure. The Project would connect to existing utility lines, with new utility lines placed underground. The Project does not propose to use natural gas.

The City of Los Angeles Bureau of Sanitation and private waste haulers, which are responsible for solid waste collection and hauling within the City, would serve the proposed Project.

### Construction

Project construction is proposed to occur over approximately 18 months, beginning January 2026 and ending July 2027. For purposes of this environmental analysis, Project construction is assumed to occur in the following sequence:

- Demolition: 1 month
- Site Preparation: 1.5 months
- Grading: 3.5 months
- Building construction: 6 months
- Paving: 4 months
- Architectural coating and landscaping: 2 months

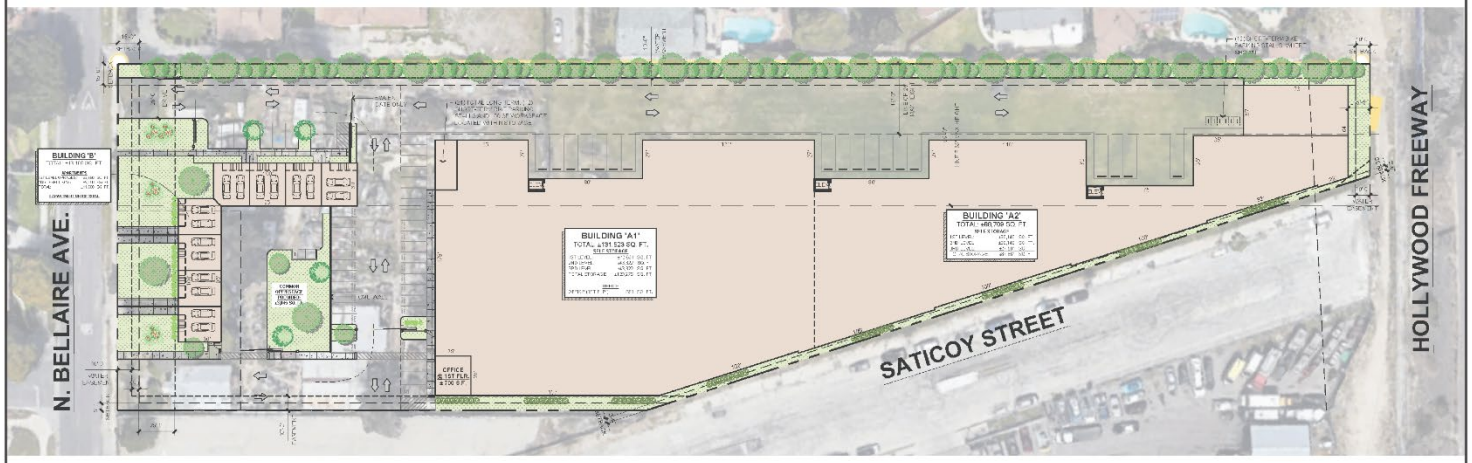
Approximately 7,781 cubic yards (cy) of export and 4,413 cy of import are anticipated. The City would review and approve the final grading plan before Grading Permit issuance.

## 2.4 Agreements, Permits, and Approvals

The City, as the Lead Agency for the Project, has discretionary authority over the Project. To implement the Project, the Applicant would need to obtain, at a minimum, the following discretionary permits/approvals:

- **Site Plan Review:** Required pursuant to LAMC §16.05, *Site Plan Review,* for use of land permits for any development project, which creates 50,000 gross SF or more of nonresidential floor area.
- **General Plan Amendment**: To change the existing General Plan land use designations from Low Residential and Parking Buffer to Commercial Manufacturing to allow for the proposed self-storage and residential uses.
- **Zone Change:** To change the existing zoning from Tentative "R1" One-Family Zone ([T]R-1), "R2" Two-Family Zone (R2-1), and "RA" Suburban Zone (RA-1) to Commercial Manufacturing (CM-1) Zone to allow the proposed commercial and residential uses.
- **Conditional Use Permit:** To allow a mixed-use development within the CM-1 zone.
- **Waiver and Dedication and Improvements:** Eliminate/alter a dedication and improvement requirement at the Project site's northern portion along Teesdale Avenue.
- **Environmental Assessment:** Initial Study/Mitigated Negative Declaration (IS/MND).

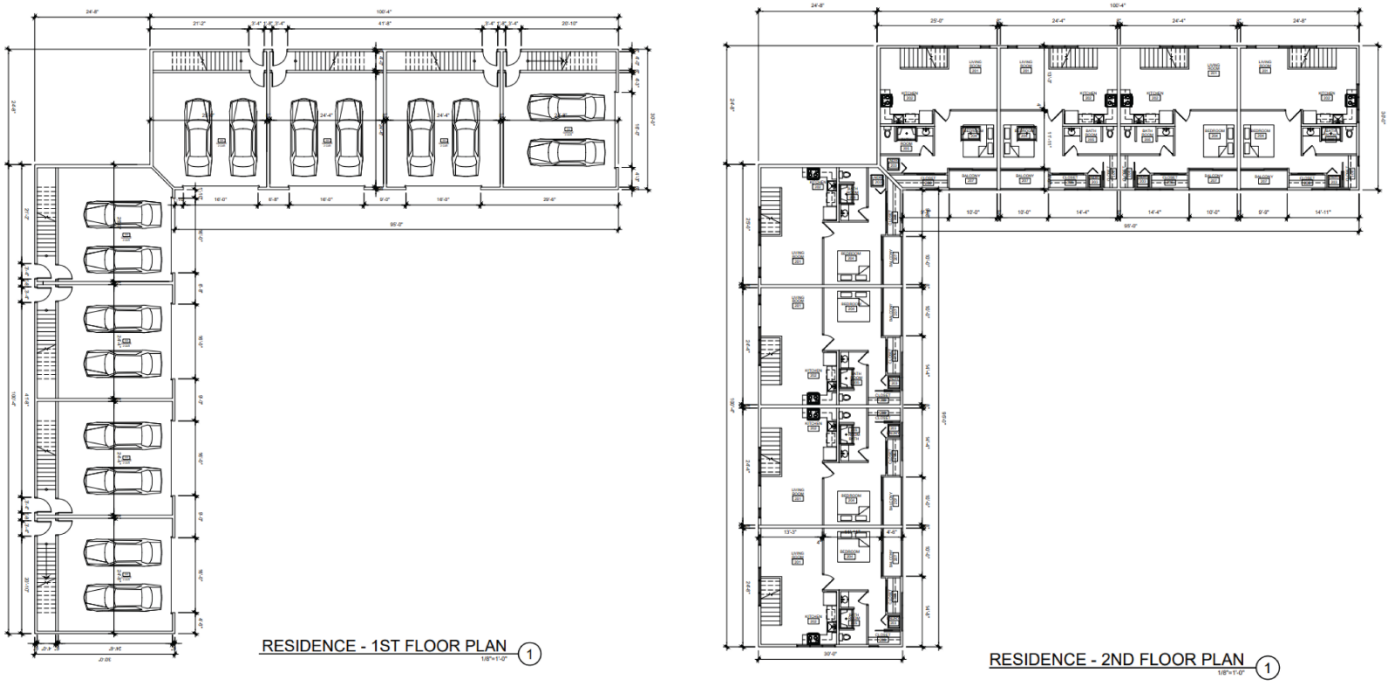
Other construction-related ministerial approvals from the City (e.g., Demolition Permit, Grading Permit, and Building Permit) are also required.




**Source: Jordan Architects, August 5, 2025**

**EXHIBIT 2-5A: PRELIMINARY SITE PLAN**
7528 North Bellaire Mixed-Use Project

NOT TO SCALE




**Source: Jordan Architects, August 5, 2025**

**EXHIBIT 2-5B: PRELIMINARY RESIDENTIAL SITE PLAN**
7528 North Bellaire Mixed-Use Project

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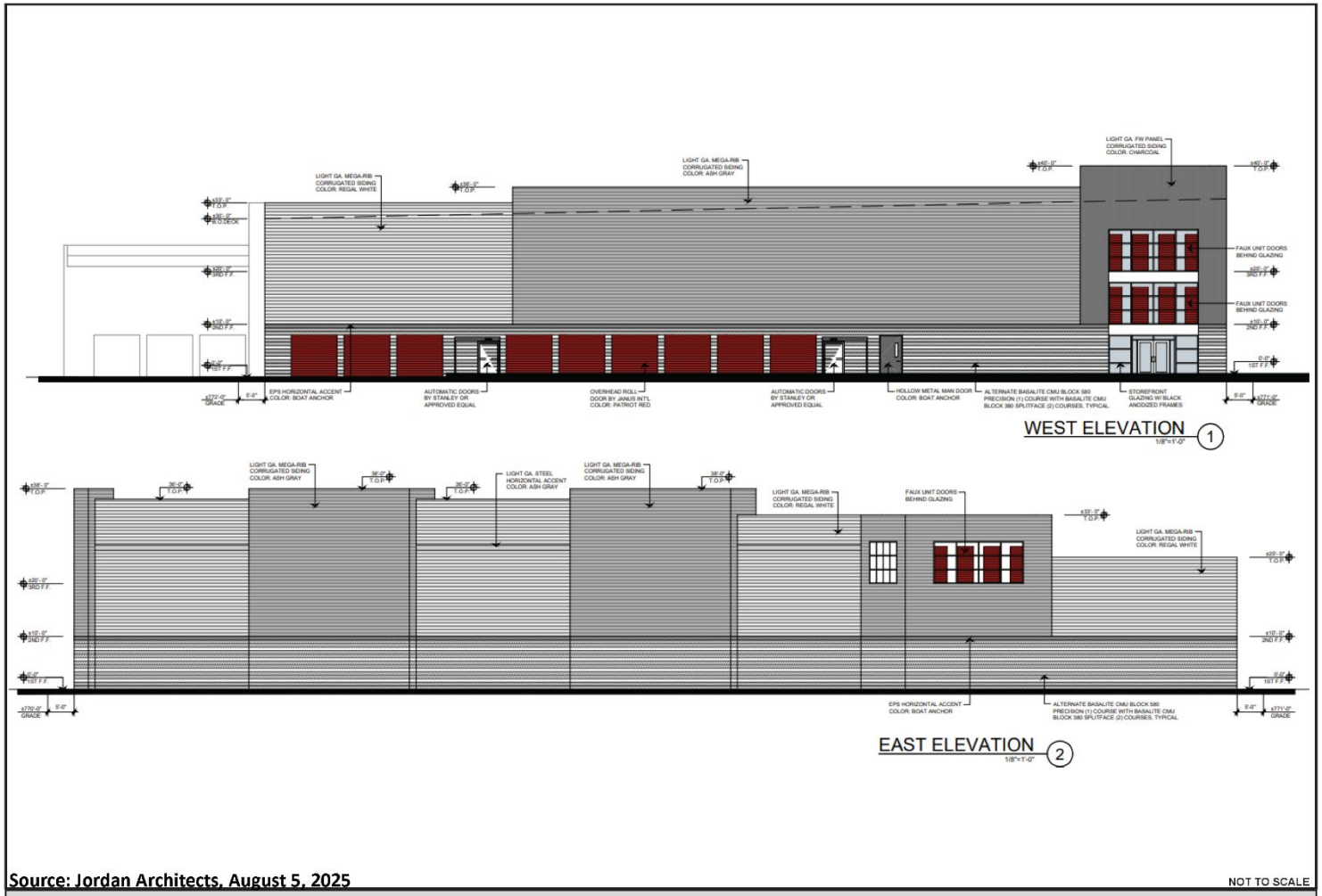


Source: Jordan Architects, August 5, 2025

NOT TO SCALE

**EXHIBIT 2-6A: PRELIMINARY EAST AND WEST ELEVATIONS - BUILDING A**
7528 North Bellaire Mixed-Use Project


Source: Jordan Architects, August 5, 2025

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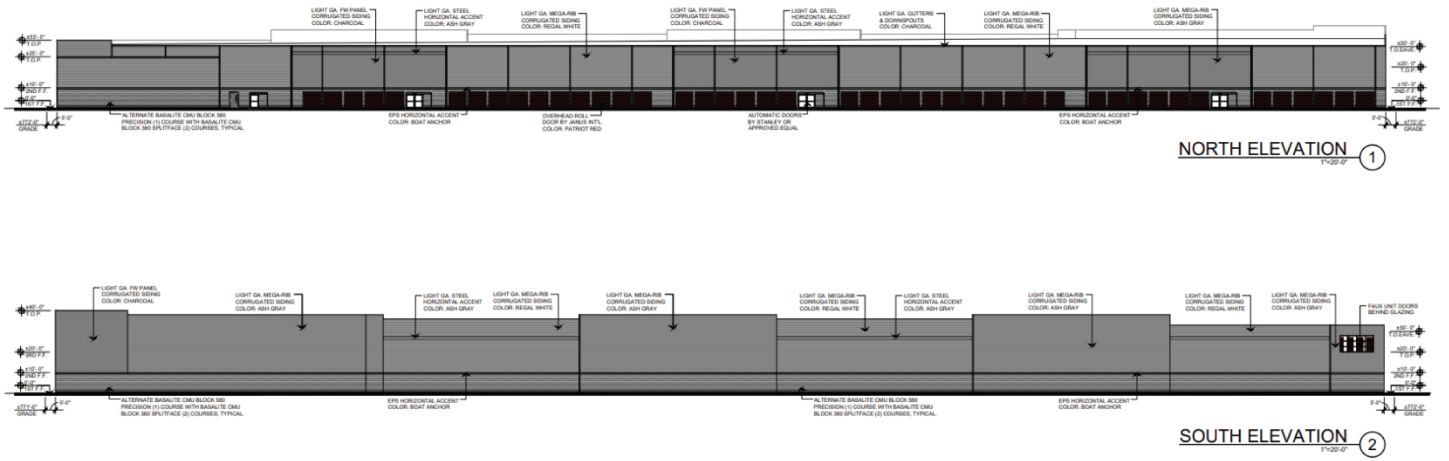
**EXHIBIT 2-6B: PRELIMINARY EAST AND WEST ELEVATIONS - BUILDING B**
7528 North Bellaire Mixed-Use Project




**Source: Jordan Architects, August 5, 2025**

NOT TO SCALE

**EXHIBIT 2-6C: PRELIMINARY NORTH AND SOUTH ELEVATIONS - BUILDING A**
7528 North Bellaire Mixed-Use Project


**Source: Jordan Architects, August 5, 2025**

NOT TO SCALE

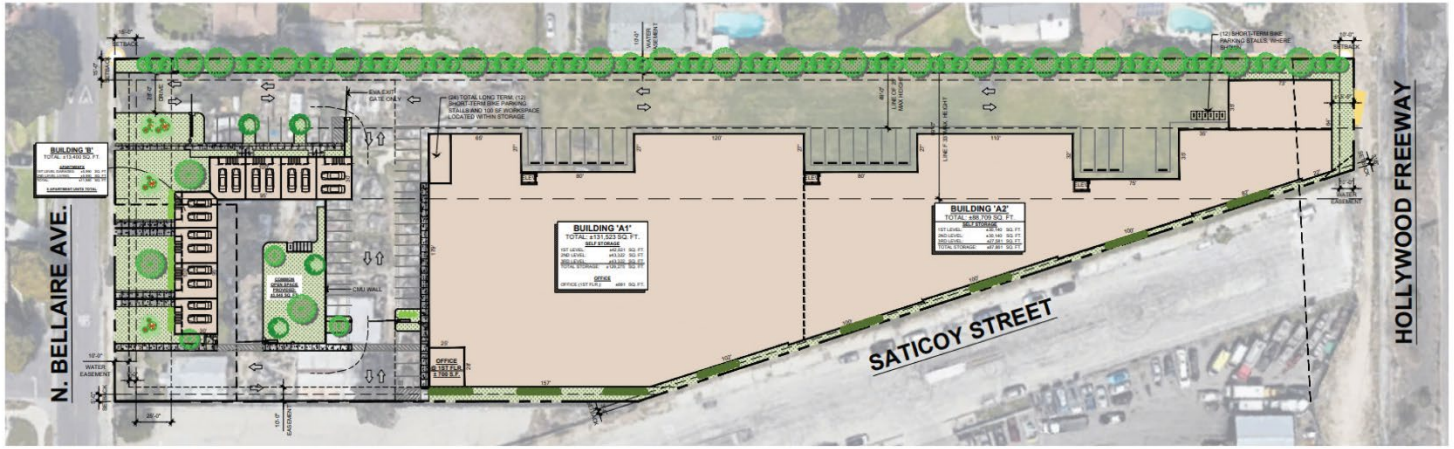
**EXHIBIT 2-6D: PRELIMINARY NORTH AND SOUTH ELEVATIONS - BUILDING B**
7528 North Bellaire Mixed-Use Project


**Source: Jordan Architects, August 5, 2025**

**EXHIBIT 2-7: PRELIMINARY RENDERING**
7528 North Bellaire Mixed-Use Project

Kimley»Horn

| PLANTING LEGEND | QTY. |
|---|---|
| - AMERICAN ELM | 82 |
| - CEDAR ELM | 4 |
| - SWEET BOX & CLUSTER OF SHRUBS | 4 |
| - ITALIAN CYPRESS | 72 |
| - YAUPON HOLLY | 14 |
| - TASMANIAN LILLY | 12 |
| - HYBRID BERMUDA GRASS | 25,365 S.F. |




**Source: Jordan Architects, August 5, 2025**

**EXHIBIT 2-8: PRELIMINARY LANDSCAPE PLAN**
7528 North Bellaire Mixed-Use Project

Kimley»Horn

# 3.0 ENVIRONMENTAL CHECKLIST FORM

## 3.1 Background

| | |
|---|---|
| **1.** | **Project Title:**<br>7528 North Bellaire Mixed-Use Project |
| **2.** | **Lead Agency Name and Address:**<br>Los Angeles Department of City Planning<br>626 Van Nuys Boulevard, #430<br>Van Nuys, CA 91401 |
| **3.** | **Contact Person and Phone Number:**<br>Dang Nguyen, City Planner<br>Tel: 818-374-5027<br>Email: dang.nguyen@lacity.org |
| **4.** | **Project Location:**<br>7528 Bellaire Ave, North Hollywood, CA 91605 |
| **5.** | **Project Sponsor's Name and Address:**<br>Trojan Storage of North Hollywood, LLC<br>1732 Aviation Boulevard<br>Redondo Beach, CA 90278 |
| **6.** | **General Plan Designation:** Low Residential; Commercial Manufacturing; Parking Buffer. See **Table 2-1: Existing Land Use Designations.** |
| **7.** | **Zoning:** "RA" Suburban Zone (RA-1); Tentative "R1" One-Family Zone ([T]R-1); and "R2" Two-Family Zone (R2-1). See **Table 2-2: Existing Zoning**. |
| **8.** | **Description of Project:** See **Section 2.3: Project Characteristics** |
| **9.** | **Surrounding Land Uses and Setting:** See **Table 2.2-3: Surrounding Land Uses** |
| **10.** | **Other public agencies whose approval is required (e.g., permits):**<br>N/A |
| **11.** | **Have California Native American tribes traditionally and culturally affiliated with the Project area requested consultation pursuant to Public Resources Code §21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of the significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?**<br>See **Section 4.18: Tribal Cultural Resources**. |

## 3.2 Environmental Factors Potentially Affected

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

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

## 3.3 Lead Agency Determination

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. | X |
| 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 or a potentially significant, unless mitigated impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2), has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed. | |
| I find that although the proposed Project could have a significant effect on the environment because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed Project, nothing further is required. | |

**CITY OF LOS ANGELES**

Joshua Ordonez

Joshua Ordonez
Planning Assistant

9/25/2025
Date

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# 4.0 EVALUATION OF ENVIRONMENTAL IMPACTS

The following environmental analysis is patterned after State CEQA Guidelines Appendix G**.** An explanation is provided for all responses except "No Impact" responses, which are supported by the cited information sources. The responses consider the whole action involved with the proposed Project: onsite and off-site, Project- and cumulative-level, direct and indirect, and short-term construction and long-term operational. The explanation of each issue also identifies the significance criteria or threshold, if any, used to evaluate each question, and the mitigation identified, if any, to avoid or reduce the impact to less than significant. To each question, there are four possible responses:

- **No Impact.** The Project would not have any measurable environmental impact.
- **Less Than Significant Impact.** The Project would have the potential to impact the environment, although this impact would be below established thresholds that are considered to be significant.
- **Less Than Significant With Mitigation Incorporated.** The Project would have the potential to generate impacts, which may be considered a significant effect on the environment, although mitigation measures or changes to the Project's physical or operational characteristics could reduce these impacts to a less than significant level.
- **Potentially Significant Impact.** The Project could have impacts that may be considered significant and therefore additional analysis is required to identify mitigation. A determination that there is a potential for significant effects indicates the need to analyze the Project's impacts and identify mitigation more fully.

## 4.1 Aesthetics

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

### Impact Analysis

#### *4.1a Would the Project have a substantial adverse effect on a scenic vista?*

**No Impact.** The City of Los Angeles General Plan (General Plan) Conservation Element specifies that scenic views or vistas are the panoramic public view access to natural features, including views of the ocean, striking or unusual natural terrain, or unique urban or historic features.[1] The Project site is in a highly urbanized area of North Hollywood, and there are no views of natural features or unique urban or historic features from the Project site. Therefore, the Project would not have an adverse effect on a scenic vista. No impact would occur, and no mitigation is required.

#### *4.1b Would the Project substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a State Scenic Highway?*

**No Impact.** There are no State- or County-designated scenic highways near the Project site.[2] The Sun Valley – La Tuna Canyon Community Plan designates Stonehurst Avenue, La Tuna Canyon Road,

[1] City of Los Angeles. (2001). City of Los Angeles General Plan Conservation Element

[2] California Department of Transportation. (2018). California State Scenic Highway System Map. Available at: https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways

Wentworth Street, and the Foothill Freeway as Scenic Highways; however, these are at least five miles from the Project site. Moreover, the area surrounding the Project site is predominantly developed, with no natural landforms or scenic features present. Therefore, the Project would not damage scenic resources within a State Scenic Highway. No impact would occur, and no mitigation is required.

*4.1c If in a non-urbanized area, would the Project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?*

**No Impact.** The Project site is located in an urbanized area of North Hollywood. The Project site contains one vacant single-family residential dwelling (circa 1938) and occupies the site's southwest corner. The Project site is devoid of scenic resources. As described in **Table 2.2-3: Surrounding Land Uses**, the Project site is surrounded by roadways and residential/industrial land uses. The Project proposes to remove all existing onsite improvements and construct a mixed-use development with commercial (self-storage) and residential (townhouse-style apartments at 2.3 DU/AC).

To implement the Project, the Applicant seeks a Zone Change from Tentative "R1" One-Family Zone ([T]R-1), "R2" Two-Family Zone (R2-1), and "RA" Suburban Zone (RA-1) to Commercial Manufacturing (CM-1). Therefore, the Project would be subject to LAMC §12.17.1, *"CM" Commercial Manufacturing Zone*, which designates, regulates, and restricts the location and use of buildings, structures, and land within the CM Zone. Additionally, the Project would be required to comply with the applicable provisions of LAMC §12.21, *General Provisions*, which address aesthetics (e.g., walls, height, lighting, signage, parking, etc.).

As part of the City's Site Plan Review process required under LAMC §16.05, *Project Review*, the Project's Site Plan would be reviewed and approved only after finding the proposed development, including its proposed uses and physical design, is in substantial conformance with the Community Plan's purposes, intent, and provisions. Additionally, the Project's Site Plan would be reviewed and approved only after finding the proposed development consists of an arrangement of buildings and structures (including height, bulk, and setbacks), off-street parking facilities, loading areas, lighting, landscaping, trash collection, and other such pertinent improvements that would be compatible with existing and future development on adjacent and neighboring properties. Although the LAMC does not identify specific regulations governing scenic quality, the City's Site Plan Review process would ensure the Project's physical design is consistent and compatible with the site and surrounding area. Therefore, the Project would not conflict with applicable zoning and other regulations governing scenic quality. No impact would occur, and no mitigation is required.

### *4.1d Would the Project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?*

**Less Than Significant Impact.** The Project site is in an urbanized area with existing light sources, which include streetlights on Bellaire Avenue and Saticoy Street, residential and commercial lighting, and vehicle headlights.

Construction. While most of the Project construction would occur during daylight hours, some Project construction could occur up until 9:00 p.m. and require the use of artificial lighting, particularly during the winter season when daylight is no longer sufficient earlier in the day. Outdoor lighting sources, such as floodlights, spotlights, and/or headlights associated with construction equipment and hauling trucks, typically accompany nighttime construction activities. To the extent evening construction includes artificial light sources, such use would be temporary and would cease upon completion of Project construction. Furthermore, construction-related illumination would be used for safety and security purposes only, pursuant to LAMC §93.0117, which prohibits any exterior light source that may cause more than two footcandles (21.5 1x) of light intensity or generate direct glare onto exterior glazed windows or glass doors; elevated porch, deck, or balcony; or any ground surface intended for uses such as recreation, barbecue or lawn areas or any property containing a residential unit or units.

Daytime glare could potentially occur during construction activities if reflective construction materials were positioned in highly visible locations where the reflection of sunlight could occur. However, any glare would be highly transitory and short-term, given the movement of construction equipment and materials within the construction area, and the temporary nature of construction activities. In addition, large, flat surfaces that are generally required to generate substantial glare are typically not an element of construction activities. Furthermore, temporary construction fencing would be placed along the periphery of the Project site to screen construction activity from view at the street level from off-site locations. Therefore, Project construction activities would not create a new source of substantial light and glare, which would adversely affect day or nighttime views in the area. A less than significant impact would occur, and no mitigation is required.

Operations. The Project would replace the existing single-family residential dwelling with a mixed-use development comprised of two buildings (a self-storage facility and a residential development). The Project would generate lighting from two primary sources: lighting from building interiors that would pass through windows and lighting from exterior sources (e.g., street lighting, parking lot lighting, building illumination, security lighting, and landscape lighting). In compliance with LAMC §93.0117, exterior lighting on the Project site would not illuminate adjacent properties. The City would review the proposed lighting for conformance with California Code of Regulations Title 24 (California Building Standards Code (CBSC)) Part 6 (California Energy Code) Building Energy and Efficiency Standards in effect at the time of building permit application to ensure the minimum amount of lighting is used, and no illumination would occur on adjacent properties. The Project would also be required to comply with CCR Title 24 standards, which require all glass used in the building design to have minimal reflectivity to reduce glare to surrounding neighbors. Buildings with large facades constructed of reflective surfaces (e.g., brightly colored building façades, metal surfaces, and reflective glass) could increase existing levels of daytime glare. The Project's proposed design does not include such surfaces or components. Compliance with the established regulatory framework (i.e., CCR Title 24 and LAMC §93.0117) would be verified through the City's plan review process. Therefore, Project operations would not create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area. Impacts would be less than significant, and no mitigation is required.

**Mitigation Measures**

No mitigation is required.

## 4.2 Agricultural and Forestry Resources

| Environmental Issue | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997), prepared by the California Department of Conservation, as an optional model to use in assessing impacts on agriculture and farmland. Would the Project:** | | | | |
| a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? | | | | X |
| b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? | | | | X |
| c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code §12220(g)), timberland (as defined by Public Resources Code §4526), or timberland zoned Timberland Production (as defined by Government Code §51104(g))? | | | | X |
| d) Result in the loss of forest land or conversion of forest land to non-forest use? | | | | X |
| e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? | | | | X |

### Impact Analysis

*4.2a Would the Project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?*

**No Impact.** The Project site is not located on designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as shown on the maps prepared according to the Farmland Mapping and Monitoring Program.[3] The urban character of the Project Site would be consistent with the Farmland Mapping and Monitoring Program's definition of "Urban and Built-Up Land," which does

[3] State of California Department of Conservation. (2024). California Important Farmland Finder,

not constitute farmland. Moreover, the Project site is occupied by a single-family residential use and is in a highly urbanized setting. No agricultural uses, or related farmland operations, are present within or near the Project site. Therefore, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses. No impact would occur, and no mitigation is required.

*4.2b Would the Project conflict with existing zoning for agricultural use or a Williamson Act contract?*

**No Impact.** The Project site is zoned "RA" Suburban Zone (RA-1), "Tentative R1" One-Family Zone (RA-1), and "R2" Two-Family Zone (R2-1), and thus, is not zoned for agricultural uses. The properties surrounding the Project site are also not zoned for agricultural use; see **Table 2.2-3: Surrounding Land Uses**. As such, the Project would not conflict with existing zoning for agricultural use. The Project site is within an Urban Agriculture Incentive Zone (UAIZ). The UAIZ is a state program (AB 551) adopted by the California State Legislature in 2013.[4] This program aims to encourage urban agriculture in urbanized areas by offering reduced property taxes in exchange for converting vacant or unimproved property to agricultural use through a contract agreement, starting with a 5-year period. The Project does not involve a contract to use vacant property for agricultural purposes in exchange for reduced property taxes.

The Williamson Act of 1965 allows local governments to enter into contractual agreements with local landowners to try to limit specific parcels of land to agricultural or other related open space use. The Project site is not under a Williamson Act contract. Therefore, the Project would not conflict with existing zoning for agricultural use or a Williamson Act contract. No impact would occur, and no mitigation is required.

*4.2c Would the Project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code §12220(g)), timberland (as defined by Public Resources Code §4526), or timberland zoned Timberland Production (as defined by Government Code §51104(g))?*

**No Impact.** The City does not have specific zoning for timberland or timberland production; however, forest land is a permitted use in the OS (Open Space) Zone. The Project Site is zoned "RA" Suburban Zone (RA-1), "Tentative R1" One-Family Zone (RA-1), and "R2" Two-Family Zone (R2-1); thus, it is not zoned OS or forest land or timberland. The properties surrounding the Project site are also not zoned OS, forest land, or timberland; see **Table 2.2-3**: Surrounding Land Uses. Moreover, the Project site is occupied by a single-family residential use and does not include timberland or timberland production uses. Therefore, the Project would not conflict with existing zoning for forest land or timberland or result in the rezoning of forest land, timberland, or timberland production. No impact would occur, and no mitigation is required.

*4.2d Would the project result in the loss of forest land or conversion of forest land to non-forest use?*

**No Impact**. The Project site is occupied by a single-family residential use and is in an urban setting. No forest land exists on or near the Project site; see also **Table 2.2-3: Surrounding Land Uses**. Therefore, the

[4] Los Angeles County Planning. (N.d.). Long Range Planning, Urban Agriculture Incentive Zone. Retrieved from: https://planning.lacounty.gov/long-range-planning/urban-agriculture-incentive-zone/#:~:text=This%20program%20aims%20to%20encourage,with%20a%205%2Dyear%20period.

Project would not result in the loss of forest land or conversion of forest land to non-forest use. No impact would occur, and no mitigation is required.

*4.2e Would the Project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?*

**No Impact.** The Project site is in an urban area, and the properties surrounding the Project site are fully improved; see **Table 2.2-3**: Surrounding Land Uses. No agricultural uses, designated Farmland, or forest land uses occur at the Project site or in the surrounding area. Therefore, Project implementation would not involve changes that would result in the conversion of Farmland to non-agricultural use or the conversion of forest land to non-forest use. No impact would occur, and no mitigation is required.

**Mitigation Measures**

No mitigation is required.

## 4.3 Air Quality

Information and analysis in this section is based primarily on data provided in the following sources[5]:

- Air Quality Assessment 7528 North Bellaire Avenue Mixed-Use Project ("Air Quality Assessment") (Kimley-Horn and Associates, Inc., July 2024); see **Appendix 4.3-1: Air Quality Assessment**.
- Health Risk Assessment, 7528 North Bellaire Avenue Mixed-Use Project ("Health Risk Assessment") (Kimley-Horn and Associates, Inc., July 2024); see **Appendix 4.3-1: Health Risk Assessment**.

| Environmental Issue | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **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? | | | X | |
| 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? | | | X | |
| c) Expose sensitive receptors to substantial pollutant concentrations? | | | X | |
| d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? | | | X | |

### Impact Analysis

*4.3a Would the Project conflict with or obstruct implementation of the applicable air quality plan?*

**Less Than Significant Impact.** The Project site is within the South Coast Air Basin (SCAB), which is under the South Coast Air Quality Management District (SCAQMD) jurisdiction. The SCAQMD is required, under the FCAA, to reduce emissions of criteria pollutants for which the SCAB is in nonattainment. To reduce such emissions, the SCAQMD drafted the 2016 and 2022 Air Quality Management Plans (AQMPs)[6], which

[5] Since completion of the Air Quality Assessment, Health Risk Assessment, and other supporting technical studies, the Project site plan has been modified to reduce the total number of dwelling units by one and slightly decrease overall building square footage. These minor revisions would not result in new or more severe environmental impacts than those analyzed in the technical studies, and the conclusions of the analyses remain valid.

[6] The 2022 AQMP (adopted in December 2022) was developed to address attainment of the 2015 8-hour $O_3$ standard. The 2016 AQMP (adopted in March 2017) was developed to address attainment of multiple $O_3$ and $PM_{2.5}$ standards.

establish programs of rules and regulations directed at reducing air pollutant emissions and achieving CAAQS and NAAQS. The AQMPs are a regional and multi-agency effort including the SCAQMD, the California Air Resources Board (CARB), the Southern California Association of Governments (SCAG), and the United States Environmental Protection Agency (U.S. EPA). The AQMPs' pollutant control strategies are based on the latest scientific and technical information and planning assumptions, including SCAG's Connect SoCal 2024 (2024-2050 Regional Transportation Plan/Sustainable Communities Strategy [RTP/SCS]). SCAG's latest growth forecasts at the time of AQMP preparation were defined in consultation with local governments and based on local general plans. The Project is subject to the SCAQMD's AQMPs.

Criteria for determining consistency with the AQMPs are listed below:

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

According to the SCAQMD's *CEQA Air Quality Handbook*, the purpose of the consistency finding is to determine if a project is inconsistent with the AQMP's assumptions and objectives, and thus if it would interfere with the region's ability to comply with California ambient air quality standards (CAAQS) and National ambient air quality standards (NAAQS).

The violations to which Consistency Criterion No. 1 refers are exceeding the CAAQS and NAAQS. As discussed in Response 4.3b (cumulative net increase in air emissions), the Project would not exceed the SCAQMD's construction or operational thresholds. Therefore, the Project would not exceed the CAAQS or NAAQS, would not contribute to an existing air quality violation, and is consistent with the first criterion.

Concerning Consistency Criterion No. 2, the AQMPs contain air pollutant reduction strategies based on SCAG's latest growth forecasts, and SCAG's growth forecasts were defined in consultation with local governments and referencing local general plans. Because the Project site's land use designation is Commercial Manufacturing, Parking Buffer, and Low Residential, this is what was assumed in the AQMPs for the Project site. SCAG forecasts the City's population will grow to approximately 4,771,300 persons by 2045.[7] SCAGs forecast 2045 population is based on the Project site's existing land use designations (i.e., Commercial Manufacturing, Parking Buffer, and Low Residential). To implement the mixed-use development, the Project proposes a General Plan Amendment to change the site's Parking Buffer and Low Residential land use designations to Commercial Manufacturing. Using SCAG's average persons per DU for the County, consistent with SCAG methodology, the Project site's existing Low Residential designation on 0.59 AC would generate a population growth of approximately 10 persons.[8] Using SCAG's average persons per DU for the County, consistent with SCAG methodology, the Project would generate a population growth of approximately 21 persons.[9] Therefore, SCAG's latest population growth forecasts did not account for a portion (approximately 14 persons) of the Project's forecast population growth. The

[7] As previously mentioned, the 2022 AQMP incorporates information and planning assumptions from Connect SoCal 2020 thus, demographic data was retrieved from: Southern California Association of Governments. (2020). *Connect SoCal 2020, Demographics and Growth Forecast*.

[8] Based on four DU, 100 percent occupancy, and 2.6 persons per household (Southern California Association of Governments. (2024). *Connect SoCal 2024 Demographics and Growth Forecast*)

[9] Based on eight DU, 100 percent occupancy, and 2.6 persons per household (Southern California Association of Governments. (2024). *Connect SoCal 2024 Demographics and Growth Forecast)*

Project's proposed apartment development would increase SCAG's forecast population only nominally (by approximately 0.0003 percent), although it would cause the population growth forecasts to be exceeded. The Project's net forecast population growth of 14 persons is not considered substantial concerning SCAGs growth forecasts. Therefore, although the Project would include a General Plan Amendment, the forecast population growth resulting from the land use change would be nominal and is not considered substantial concerning consistency with the AQMPs. Further, the Project would not exceed SCAQMD's significance thresholds. Therefore, the Project is consistent with the second criterion. Because the Project is consistent with the SCAQMD consistency finding criteria, the Project would not conflict with or obstruct the implementation of the AQMP.

**City of Los Angeles General Plan Consistency**

The General Plan Air Quality Element was adopted on November 24, 1992, and sets forth the goals, objectives, and policies that guide the City in the implementation of its air quality improvement programs and strategies. The Air Quality Element acknowledges the interrelationships between transportation and land use planning in meeting the City's mobility and air quality goals. As shown in **Table 4.3-1: Project Consistency with the City of Los Angeles General Plan Air Quality Element**, the Project would be consistent with the applicable General Plan Air Quality Element policies.

**Table 4.3-1: Project Consistency with the City of Los Angeles General Plan Air Quality Element**

| Policy | Project Consistency |
|---|---|
| **Policy 1.3.1:** Minimize particulate emissions from construction sites | **Consistent**. The Project would comply with SCAQMD Rule 403, which requires dust control measures during construction activities, and would therefore minimize particulate emissions from Project construction. |
| **Policy 1.3.2:** Minimize particulate emissions from unpaved roads and parking lots associated with vehicular traffic | **Consistent**. The Project does not involve unpaved roads and only limited surface parking, thereby minimizing particulate emissions from vehicular traffic. |
| **Policy 2.1.1:** Utilize compressed work weeks and flextime, telecommuting, carpooling, vanpooling, public transit, and improve walking/bicycling related facilities in order to reduce Vehicle Trips and/or Vehicle Miles Traveled (VMT) as an employer and encourage the private sector to do the same to reduce work trips and traffic congestion. | **Consistent.** The Project site is within 0.10 miles of local bus lines, thereby encouraging employees and residents to utilize alternative transportation modes, further reducing work trips and traffic congestion. |
| **Policy 4.1.2.** Ensure that project level review and approval of land use development remains at the local level | **Consistent.** The Project would be subject to review by the City of Los Angeles Department of City Planning**.** |
| **Policy 4.2.2:** Improve accessibility for the City's residents to places of employment, shopping centers and other establishments. | **Consistent.** The Project is in an urbanized area where future residents would have access to employment, shopping centers, and other establishments. |

| Policy | Project Consistency |
|---|---|
| **Policy 4.2.3:** Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles. | **Consistent.** The Project would provide 21 electric vehicle (EV) charging spaces and be located within 0.10-mile of public transportation. |
| **Policy 4.2.4**: Require that air quality impacts be a consideration in the review and approval of all discretionary projects. | **Consistent**. The Project's air quality impacts are analyzed in this study. This air quality analysis will be considered by the City in its Project review and approval process. |
| **Policy 4.2.5.** Emphasize trip reduction, alternative transit, and congestion management measures for discretionary projects. | **Consistent**. Future Project residents and employees would have access to public transit as the Project site is within 0.10 miles of local bus lines. |
| **Policy 5.1.2:** Effect a reduction in energy consumption and shift to nonpolluting sources of energy in its buildings and operations. | **Consistent**. The Project would comply with the latest Title 24, LAMC, CALGreen Building Code, and L.A. Green Building Code energy efficiency requirements. |
| **Policy 5.1.4:** Reduce energy consumption and associated air emissions by encouraging waste reduction and recycling. | **Consistent**. The Project would comply with the latest Title 24 energy efficiency requirements, CALGreen Building Code, L.A. Green Building Code, and the City's waste diversion requirements. |

As discussed above, the Project would not increase the frequency or severity of an existing air quality violation or cause or contribute to new violations for these pollutants. As the Project would not exceed any of the CAAQS and NAAQS, the Project would also not delay the timely attainment of air quality standards or interim emission reductions specified in the AQMPs. In addition, the Project would be generally consistent with the emissions forecasts in the AQMPs (the population growth would be nominal, and the employment growth was anticipated) and AQMP control measures.

The Project would not conflict with or obstruct the implementation of the AQMPs or any applicable air quality plan. A less than significant impact would occur, and no mitigation is required.

*4.3b Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is nonattainment under an applicable federal or state ambient air quality standard?*

**Less Than Significant Impact.**

Construction Emissions. Project construction activities would generate short-term criteria for air pollutant emissions. The criteria pollutants of primary concern within the Project area are $O_3$ precursor pollutants (i.e., reactive organic gases [ROG] and nitrogen oxides [$NO_X$]) and $PM_{10}$ and $PM_{2.5}$. Construction-related emissions are short-term and of temporary duration, lasting only as long as construction activities occur, but would be considered a significant air quality impact if the criteria pollutant emissions exceeded the SCAQMD's thresholds of significance.

Construction results in the temporary generation of emissions resulting from site grading, road paving, motor vehicle exhaust associated with construction equipment and worker trips, and the movement of construction equipment, especially on unpaved surfaces. Emissions of airborne particulate matter are

largely dependent on the amount of ground disturbance associated with site preparation activities, as well as weather conditions and the appropriate application of water.

Project construction is anticipated to occur over approximately 18 months, beginning January 2026 and ending July 2027. The Project's construction-related emissions were calculated using the CARB-approved CalEEMod computer program. See **Appendix 4.3-1** for more information regarding the construction assumptions used in this analysis. The Project's predicted maximum daily construction-related emissions are summarized in **Table 4.3-2: Construction-Related Emissions**. It is noted that due to technological improvements in construction equipment, the Project's construction emissions would likely be lower than those shown in **Table 4.3-2** if construction were to occur in later years.

Fugitive dust emissions may have a substantial, temporary impact on local air quality. In addition, fugitive dust may be a nuisance to those living and working in the Project vicinity. Uncontrolled dust from construction can become a nuisance and a potential health hazard to those living and working nearby. SCAQMD Rules 402 and 403 (prohibition of nuisances, watering of inactive and perimeter areas, track out requirements, etc.) apply to the Project and were applied in CalEEMod to minimize fugitive dust emissions. Rule 1113 provides specifications on painting practices and regulates the ROG content of paint. The Project would be required to comply with SCAQMD rules and regulations, including SCAQMD Rules 402, 403, and 1113. As shown in **Table 4.3-2**, construction emissions would not exceed SCAQMD thresholds for all criteria pollutants. A less than significant impact would occur, and no mitigation is required.

**Table 4.3-2: Construction-Related Emissions**

| Construction Year | Emissions (Maximum Pounds Per Day) | | | | | |
|---|---|---|---|---|---|---|
| | ROG | $NO_X$ | CO | $SO_2$ | $PM_{10}$ | $PM_{2.5}$ |
| **Unmitigated Emissions** | | | | | | |
| Year 1 (2026) | 3.21 | 29.24 | 29.77 | 0.05 | 3.71 | 2.01 |
| Year 2 (2027) | 47.84 | 18.57 | 18.57 | 0.06 | 1.95 | 0.71 |
| *SCAQMD Threshold* | *75* | *100* | *550* | *150* | *150* | 55 |
| **Exceed SCAQMD Threshold?** | **No** | **No** | **No** | **No** | **No** | **No** |
| ROG = Reactive Organic Gases; $NO_X$ = Nitrogen Oxides; CO = Carbon Monoxide; $SO_2$ = Sulfur Dioxide; $PM_{10}$ = Particulate Matter 10 microns in diameter or less; $PM_{2.5}$ = Particulate Matter 2.5 microns in diameter or less | | | | | | |
| Source: CalEEMod version 2022.1. Refer to **Appendix 4.3-1** for model outputs. | | | | | | |

Operational Emissions. The Project's operational emissions would be primarily associated with motor vehicle use, area sources, energy emissions, and backup generators. **Table 4.3-3: Long-Term Operational Emissions** summarizes the Project's long-term operational emissions and indicates they would not exceed SCAQMD thresholds. A less than significant impact would occur, and no mitigation is required.

**Table 4.3-3: Long-Term Operational Emissions**

| Source | Maximum Pounds Per Day[1] | | | | | |
|---|---|---|---|---|---|---|
| | ROG | $NO_X$ | CO | $SO_2$ | $PM_{10}$ | $PM_{2.5}$ |
| Area Source Emissions | 7.21 | 0.09 | 10.09 | <0.00 | 0.02 | 0.01 |
| Energy Emissions | 0.05 | 0.93 | 0.80 | 0.01 | 0.07 | 0.07 |
| Mobile | 1.13 | 0.93 | 10.06 | 0.02 | 2.34 | 0.61 |
| Back-up Generators | 1.31 | 3.67 | 3.35 | 0.01 | 0.19 | 0.19 |
| **Total Emissions** | **9.70** | **5.62** | **24.3** | **0.04** | **2.62** | **0.88** |
| *SCAQMD Threshold* | ***55*** | ***55*** | ***550*** | ***150*** | ***150*** | ***55*** |

| Exceeds Threshold? | No | No | No | No | No | No |
|---|---|---|---|---|---|---|
| ROG = Reactive Organic Gases; $NO_X$ = Nitrogen Oxides; CO = Carbon Monoxide; $SO_2$ = Sulfur Dioxide; $PM_{10}$ = Particulate Matter 10 microns in diameter or less; $PM_{2.5}$ = Particulate Matter 2.5 microns in diameter or less | | | | | | |
| 1. The highest values between summer and winter results were used as a worst-case scenario. | | | | | | |
| Source: CalEEMod version 2022.1. Refer to **Appendix 4.3-1** for model outputs. | | | | | | |

Cumulative Short-Term Emissions. The SCAB is designated nonattainment for $O_3$, $PM_{10}$, and $PM_{2.5}$ CAAQS and nonattainment for $O_3$ and $PM_{2.5}$ NAAQS. Appendix D of the SCAQMD White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution (2003) notes that projects that result in emissions that do not exceed the project-specific SCAQMD regional thresholds of significance should result in a less than significant impact on a cumulative basis unless there is other pertinent information to the contrary. Therefore, if a project is estimated to result in emissions that do not exceed the thresholds, the Project's contribution to the cumulative impact on the SCAB's air quality would not be cumulatively considerable. As shown in **Table 4.3-2** above, Project construction-related emissions would not exceed the SCAQMD significance thresholds for criteria pollutants. Therefore, the Project would not generate a cumulatively considerable contribution to air pollutant emissions during construction.

The SCAQMD has developed strategies to reduce criteria pollutant emissions outlined in the AQMP under the federal Clean Air Act mandates. The analysis assumed fugitive dust controls would be used during construction, including frequent water applications. SCAQMD rules, mandates, and compliance with adopted AQMP emissions control measures would also be imposed on construction projects throughout SCAB, which would include related cumulative projects. As concluded above, the Project's construction-related impacts would be less than significant. Compliance with SCAQMD rules and regulations would further minimize the Project's construction-related emissions. Therefore, project-related construction emissions combined with those from other projects in the area would not substantially deteriorate local air quality. The Project's construction-related emissions would not result in a cumulatively considerable contribution to significant cumulative air quality impacts.

Cumulative Long-Term Emissions. The SCAQMD has not established separate significance thresholds for cumulative operational emissions. The nature of air emissions is largely a cumulative impact. As a result, no single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. Instead, individual project emissions contribute to existing cumulatively significant adverse air quality impacts. The SCAQMD developed operational thresholds of significance based on the level above which individual project emissions would result in a cumulatively considerable contribution to the SCAB's existing air quality conditions. Therefore, a project that exceeds the SCAQMD operational thresholds would also have a cumulatively considerable contribution to a significant cumulative impact.

**Table 4.3-3** shows that the Project's operational emissions would not exceed the SCAQMD thresholds. As a result, the Project's operational emissions would not represent a cumulatively considerable contribution to significant cumulative air quality impacts. Therefore, the Project's operational emissions would not result in a cumulatively considerable contribution to significant cumulative air quality impacts. A less than significant impact would occur, and no mitigation is required.

### *4.3c Would the Project expose sensitive receptors to substantial pollutant concentrations?*

**Less Than Significant Impact.**

Localized Construction Significance Analysis. To identify impacts on sensitive receptors, the SCAQMD recommends addressing localized significance thresholds (LSTs) for construction. LSTs were developed in

response to the SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4). The SCAQMD provided the Final Localized Significance Threshold Methodology (dated June 2003 [revised 2008]) for guidance. The LST methodology assists lead agencies in analyzing localized impacts associated with project-specific emissions.

Since CalEEMod calculates construction emissions based on the number of equipment hours and the maximum daily soil disturbance activity possible for each piece of equipment, **Table 4.3-4: Equipment-Specific Grading Rates** is used to determine the Project's maximum daily disturbed acreage for comparison to LSTs. The appropriate source receptor area (SRA) for the LSTs is the East San Fernando Valley (SRA 7) since this area includes the Project site. LSTs apply to $NO_2$, CO, $PM_{10}$, and $PM_{2.5}$. The SCAQMD provides look-up tables for projects that disturb areas less than or equal to 5.0 acres. Project construction is anticipated to disturb a minimum of 2.5 acres in a single day during the grading phase. As the LST guidance provides thresholds for projects disturbing 1-, 2-, and 5-acres and the thresholds increase with the site's size, the LSTs for a 2.5-acre threshold were interpolated and utilized for this analysis.

**Table 4.3-4: Equipment-Specific Grading Rates**

| Construction Phase | Equipment Type | Equipment Quantity | Acres Graded per 8-Hour Day | Operating Hours per Day | Acres Graded per Day |
|---|---|---|---|---|---|
| Grading | Tractors | 3 | 0.5 | 8 | 1.5 |
| | Graders | 1 | 0.5 | 8 | 0.5 |
| | Dozers | 1 | 0.5 | 8 | 0.5 |
| | Scrapers | 0 | 1 | 8 | 0 |
| | | | | **Total Acres Graded per Day** | **2.5** |

Source: CalEEMod version 2022.1. Refer to **Appendix 4.3-1** for model outputs.

The sensitive receptor nearest the Project site is a single-family residence located adjacent to the north. LST thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. Therefore, LSTs for receptors located at a distance of 25 meters were utilized in this analysis, consistent with SCAQMD methodology. **Table 4.3-5: Localized Significance of Construction Emissions** presents the results of localized emissions during each construction. **Table 4.3-5** shows that emissions of these pollutants on the peak day of construction would not exceed SCAQMD LSTs and, thus, would not result in significant concentrations of pollutants at nearby sensitive receptors. A less than significant impact would occur, and no mitigation is required.

**Table 4.3-5: Localized Significance of Construction Emissions**

| Construction Activity | Emissions (Maximum Pounds Per Day) | | | |
|---|---|---|---|---|
| | $NO_X$ | CO | $PM_{10}$ | $PM_{2.5}$ |
| Demolition 2026 | 20.65 | 19.01 | 0.83 | 0.78 |
| Site Preparation 2026 | 29.16 | 28.81 | 1.24 | 1.14 |
| Grading 2026 | 14.97 | 17.44 | 0.65 | 0.59 |
| Building Construction 2026 | 9.85 | 12.97 | 0.38 | 0.35 |
| Building Construction 2027 | 9.39 | 12.94 | 0.34 | 0.31 |
| Paving 2027 | 6.09 | 8.83 | 0.24 | 0.22 |
| Architectural Coating 2027 | 0.83 | 1.13 | 0.02 | 0.02 |
| *Maximum Emissions* | *29.16* | *28.81* | *1.24* | *1.14* |

| Construction Activity | Emissions (Maximum Pounds Per Day) | | | |
|---|---|---|---|---|
| | $NO_X$ | CO | $PM_{10}$ | $PM_{2.5}$ |
| *SCAQMD Localized Screening Threshold (adjusted for 2.5 acres at 25 meters)* | *141* | *1,083* | *8* | *6* |
| **Exceed SCAQMD Threshold?** | **No** | **No** | **No** | **No** |
| $NO_X$ = Nitrogen Oxides; CO = Carbon Monoxide; $PM_{10}$ = Particulate Matter 10 microns in diameter or less; $PM_{2.5}$ = Particulate Matter 2.5 microns in diameter or less | | | | |
| Source: CalEEMod version 2022.1. Refer to **Appendix 4.3-1** for model outputs. | | | | |

Localized Operational Significance Analysis. According to the SCAQMD LST methodology, LSTs would apply to the operational phase of a project only if it includes stationary sources or attracts mobile sources that may spend long periods queuing and idling at the site (e.g., warehouse or transfer facilities). Since the Project is a mixed-use development with self-storage and residential uses, the operational phase LST protocol is conservatively applied to the operational area source, energy source, and a portion of the mobile source emissions.

LST thresholds for receptors located at 25 meters in SRA 9 were utilized in this analysis because the receptors nearest the Project site are located adjacent to the north. Although the Project site is approximately 3.92 acres, the 3.5-acre LST threshold was conservatively used for this analysis, as the LSTs increase with the site's size.

For a worst-case scenario assessment, the emissions shown in **Table 4.3-6: Localized Significance of Operational Emissions** conservatively include all onsite Project-related stationary sources and five percent[10] of the Project-related mobile source emissions, since a portion of mobile sources would include vehicles maneuvering and idling on-site. **Table 4.3-6** shows that the maximum daily emissions of these pollutants for Project operations would not result in significant concentrations of pollutants at nearby sensitive receptors. A less than significant impact would occur, and no mitigation is required.

**Table 4.3-6: Localized Significance of Operational Emissions**

| Activity | Emissions (Maximum Pounds Per Day) | | | |
|---|---|---|---|---|
| | $NO_X$ | CO | $PM_{10}$ | $PM_{2.5}$ |
| Onsite Emissions (Area + Energy + Generators + Onsite Mobile Source Emissions[1]) | 4.74 | 14.74 | 0.40 | 0.30 |
| *SCAQMD Localized Screening Threshold (3.5 acres at 25 meters)* | *166* | *1,343* | *3* | *2* |
| **Exceed SCAQMD Threshold?** | **No** | **No** | **No** | **No** |
| $NO_X$ = Nitrogen Oxides; CO = Carbon Monoxide; $PM_{10}$ = Particulate Matter 10 microns in diameter or less; $PM_{2.5}$ = Particulate Matter 2.5 microns in diameter or less | | | | |
| 1. Includes five percent of mobile source emissions. | | | | |
| Source: CalEEMod version 2022.1. Refer to **Appendix 4.3-1** for model outputs. | | | | |

Criteria Pollutant Health Impacts**.** On December 24, 2018, the California Supreme Court issued an opinion identifying the need to provide sufficient information connecting a project's air emissions to health impacts or explain why such information could not be ascertained (Sierra Club v. County of Fresno (2018) 6 Cal.5th 502). The SCAQMD has set its CEQA significance thresholds based on the federal Clean Air Act (FCAA), which defines a major stationary source (in extreme $O_3$ nonattainment areas such as the SCAB) as

[10] Onsite mobile emissions account for approximately five percent of the Project's total mobile emissions based on the estimated onsite trip length divided by the overall trip length.

emitting 10 tons per year. The thresholds correlate with the trigger levels for the federal New Source Review Program and SCAQMD Rule 1303 for new or modified sources. The FCAA created the New Source Review Program to ensure that stationary air pollutant sources are constructed or modified in a manner that is consistent with the attainment of health-based NAAQS. The NAAQS establishes the necessary air quality levels, with an adequate margin of safety, to protect public health. Therefore, projects that do not exceed the SCAQMD's LSTs and mass emissions thresholds would not violate any air quality standards or contribute substantially to an existing or projected air quality violation, and no criteria for pollutant health impacts.

$NO_X$ and ROG are precursor emissions that form $O_3$ in the atmosphere in the presence of sunlight, where the pollutants undergo complex chemical reactions. It takes time and the influence of meteorological conditions for these reactions to occur, so $O_3$ may be formed at a distance downwind from the sources. Breathing ground-level $O_3$ can result in health effects that include reduced lung function, inflammation of airways, throat irritation, pain, burning, or discomfort in the chest when taking a deep breath, chest tightness, wheezing, or shortness of breath. In addition to these effects, evidence from observational studies strongly indicates that higher daily $O_3$ concentrations are associated with increased asthma attacks, increased hospital admissions, increased daily mortality, and other markers of morbidity. The consistency and coherence of the evidence for effects upon asthmatics suggest that $O_3$ can make asthma symptoms worse and can increase sensitivity to asthma triggers.

According to the SCAQMD AQMPs, $O_3$, $NO_X$, and ROG have been decreasing in the SCAB since 1975 and are projected to continue to decrease in the future. Although VMT in the SCAB continues to increase, $NO_X$ and ROG levels are decreasing because of the mandated controls on motor vehicles and the replacement of older polluting vehicles with lower-emitting vehicles. $NO_X$ emissions from electric utilities have also decreased due to the use of cleaner fuels and renewable energy. The 2022 AQMP demonstrates how the SCAQMD's control strategy to meet the $O_3$ 2015 NAAQS by 2037 would lead to sufficient $NO_X$ emission reductions. In addition, since $NO_X$ emissions also lead to the formation of $PM_{2.5}$, the $NO_X$ reductions needed to meet the $O_3$ standards will likewise lead to the improvement of $PM_{2.5}$ levels and attainment of $PM_{2.5}$ standards.

The SCAQMD's air quality modeling demonstrates that $NO_X$ reductions prove to be much more effective in reducing $O_3$ levels and will also lead to significant improvement in $PM_{2.5}$ concentrations. $NO_X$-emitting stationary sources regulated by the SCAQMD include Regional Clean Air Incentives Market facilities (e.g., refineries, power plants, etc.), natural gas combustion equipment (e.g., boilers, heaters, engines, burners, flares), and other combustion sources that burn wood or propane. The AQMPs identify robust $NO_X$ reductions from new regulations on Regional Clean Air Incentives Market facilities, non-refinery flares, commercial cooking, and residential and commercial appliances. Such combustion sources are already heavily regulated with the lowest $NO_X$ emissions levels achievable, but there are opportunities to require and accelerate replacement with cleaner zero-emission alternatives, such as residential and commercial furnaces, pool heaters, and backup power equipment. The AQMD plans to achieve such replacements through a combination of regulations and incentives. Technology-forcing regulations can drive the development and commercialization of clean technologies, with future-year requirements for new or existing equipment. Incentives can then accelerate deployment and enhance the public acceptability of new technologies.

There are significant challenges with correlating specific health effects that will occur as a result of a project's significant criteria air pollutant emissions. Generally, models that correlate criteria air pollutant

concentrations with specific health effects focus on regulatory decision-making that will apply throughout an entire air basin or region. These models focus on the region-wide health effects of pollutants so that regulators can assess the costs and benefits of adopting a proposed regulation that applies to an entire category of air pollutant sources, rather than the health effects related to emissions from a specific proposed project or source. Because of the scale of these analyses, any one project is likely to have only very small incremental effects, which may be difficult to differentiate from the effects of air pollutant concentrations in an entire air basin. In addition, such modeling efforts are costly, and the value of a project-specific analysis may be modest in relation to that cost. Furthermore, the results, while costly to produce, may not be particularly useful. For regional pollutants, it is difficult to trace a particular project's criteria air pollutant emissions to a specific health effect. Moreover, the modeled results may be misleading because the margin of error in such modeling is large enough that, even if the modeled results report a given health effect, the model is sufficiently imprecise that the actual effect may differ from the reported results; that is, the modeled results suggest precision, when in fact available models cannot be that precise on a project level.

As discussed above, the mass emissions thresholds developed by SCAQMD and used by CEQA lead agencies throughout southern California to determine the potential significance of project-related regional changes in the environment are not directly indicative of exceedances of applicable ambient air standards. Meteorology, the presence of sunlight, and other complex chemical factors all combine to determine the ultimate concentration and location of $O_3$ or PM. The effects on ground-level ambient concentrations of pollutants that may be breathed by people are also influenced by the spatial and temporal patterns of the emission sources. In other words, the effect on $O_3$ and PM concentrations from a given mass of pollutants emitted in one location may vary from the effect if that same mass of pollutants were emitted in an entirely different location in the SCAB. The same effect may be observed when the daily and seasonal emissions variations are taken into account. Regional-scale photochemical modeling, typically performed only for NAAQS attainment demonstration and rule promulgation, accounts for these changes in the spatial, temporal, and chemical nature of regional emissions.

Project construction and operational emissions would vary by time of day, month, and season, and the majority of Project-related emissions, being generated by mobile sources (cars and trucks) driving to and from the site, would be emitted throughout a wide area defined by the origins and destinations of people traveling to and from the proposed Project site. As SCAQMD has stated, "It takes a large amount of additional precursor emissions to cause a modeled increase in ambient ozone levels over an entire region."

Specifically, for extremely large regional projects, the SCAQMD states that it has been able to correlate potential health outcomes for very large emissions sources – as part of their rulemaking activity, specifically 6,620 pounds per day of $NO_X$ and 89,180 pounds per day of VOC were expected to result in approximately 20 premature deaths per year and 89,947 school absences due to $O_3$. Based on its recent experiences applying regional scale models to relatively small increases in emissions, SCAQMD stated in its Amicus Brief in the Sierra Club v. County of Fresno case: "[A] project emitting only 10 tons per year of $NO_X$ or VOC is small enough that its regional impact on ambient ozone levels may not be detected in the regional air quality models that are currently used to determine ozone levels." The Brief makes it clear that SCAQMD does not believe that there must be a quantification of a project's health risks in CEQA documents prepared for individual projects. Any attempt to quantify the proposed Project's health risks would be considered unreliable and misleading. Also, the Project does not generate anywhere near 6,620

pounds per day of $NO_X$ or 89,190 pounds per day of ROG (VOC) emissions, which SCAQMD stated was a large enough emission to quantify $O_3$-related health impacts. Therefore, the Project's emissions are not sufficiently high to use a regional modeling program to correlate health effects on a basin-wide level.

As previously discussed, localized effects of onsite Project emissions on sensitive receptors near the Project site would be less than significant (refer to **Table 4.3-5** and **Table 4.3-6**). The LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable CAAQS and NAAQS. The LSTs were developed by the SCAQMD based on the ambient concentrations of that pollutant for each SRA and the distance to the nearest sensitive receptor. The ambient air quality standards establish the levels of air quality necessary, with an adequate margin of safety, to protect public health, including protecting the health of sensitive populations. However, as discussed above, neither the SCAQMD nor any other air district currently has methodologies that would provide Lead Agencies and CEQA practitioners with a consistent, reliable, and meaningful analysis to correlate specific health impacts that may result from a proposed project's mass emissions. Information on health impacts related to exposure to ozone and particulate matter emissions published by the U.S. EPA and CARB has been summarized in **Appendix 4.3-1**. Health studies are used by these agencies to set the NAAQS and CAAQS.

Although it may be misleading and unreliable to attempt to quantify the Project's health risks specifically and numerically at a regional level, this analysis provides extensive information concerning the Project's potential health risks. Based on the construction and operational emissions, the Project does not constitute a significant health impact on the population adjacent to the Project site and within the SCAB. The reason for this is that the mass daily thresholds are in pounds per day emitted into the air, whereas health effects are determined based on the concentration of emissions in the air at a particular receptor (e.g., parts per million by volume of air, or micrograms per cubic meter of air).

The NAAQS and CAAQS were developed to protect the most susceptible population groups from adverse health effects and were established in terms of parts per million or micrograms per cubic meter for the applicable emissions. As stated earlier, the mass emission thresholds were established primarily in conjunction with federal permitting "major source" thresholds. If emissions were below these "de minimis" emission rates, then the proposed Project is presumed to conform with the NAAQS. While based on the status of an air basin's level of attainment of the health-based NAAQS, emissions in excess of the mass emission thresholds from one project do not mean the air basin would experience measurably higher ground-level concentrations, or more frequent occurrences of ground-level concentrations in exceedance of standards, or delay timely attainment of a particular NAAQS.

Ozone concentrations are dependent upon a variety of complex factors, including the presence of sunlight and precursor pollutants, natural topography, nearby structures that cause building downwash, atmospheric stability, and wind patterns. Because of the complexities of predicting ground-level ozone concentrations in relation to the NAAQS and CAAQS, none of the health-related information can be directly correlated to the pounds/day or tons/year of emissions estimated from a single, proposed project. It is also noted that this analysis identifies health concerns related to particulate matter, CO, $O_3$, and $NO_2$. Thus, this analysis is reasonable and intended to foster informed decision-making. Due to the uncertainty in the relationship between Project-level mass emissions and regional ozone formation, as well as limitations with currently available technical tools, the Project's resulting health effects cannot be identified.

Carbon Monoxide Hotspots. An analysis of CO "hot spots" is needed to determine whether the change in the level of service of an intersection resulting from the Project would have the potential to result in exceedances of the CAAQS or NAAQS. It has long been recognized that CO exceedances are caused by vehicular emissions, primarily when vehicles are idling at intersections. Vehicle emissions standards have become increasingly stringent in the last 20 years. Currently, California's CO standard is a maximum of 3.4 grams per mile for passenger cars (requirements for certain vehicles are more stringent). With the turnover of older vehicles, the introduction of cleaner fuels, and the implementation of control technology in industrial facilities, CO concentrations have steadily declined. Accordingly, with the steadily decreasing CO emissions from vehicles, even very busy intersections do not result in exceedances of the CO standard.

The SCAB was re-designated as attainment in 2007 and is no longer addressed in the SCAQMD's AQMP. The 2003 AQMP is the most recent version that addresses CO concentrations. As part of the SCAQMD CO Hotspot Analysis, the Wilshire Boulevard and Veteran Avenue intersection, one of the most congested intersections in Southern California with an average daily traffic (ADT) volume of approximately 100,000 vehicles per day, was modeled for CO concentrations. This modeling effort identified a CO concentration high of 4.6 ppm, which is well below the 35-ppm NAAQS. The Project considered herein would not produce the volume of traffic required to generate a CO hotspot in the context of SCAQMD's CO Hotspot Analysis. As the CO hotspots were not experienced at the Wilshire Boulevard and Veteran Avenue intersection, even as it accommodates 100,000 vehicles daily, it can be reasonably inferred that CO hotspots would not be experienced at any intersections in the Project vicinity resulting from the Project's 353 daily vehicle trips. Therefore, impacts would be less than significant, and no mitigation is required.

Construction and Operational Diesel Particulate Matter. Project construction would generate diesel particulate matter (DPM) emissions from the use of required off-road diesel equipment. Operational activities would also use diesel trucks, which would generate DPM emissions. The amount to which the receptors are exposed (a function of concentration and duration of exposure) is the primary factor used to determine health risk (i.e., potential exposure to toxic air contaminant [TAC] emission levels that exceed applicable standards). Health-related risks associated with diesel exhaust emissions are primarily linked to long-term exposure and the associated risk of contracting cancer.

The use of diesel-powered construction equipment would be temporary and episodic. The duration of exposure would be short, and the exhaust from construction equipment dissipates rapidly. Current models and methodologies for conducting health risk assessments are associated with longer-term exposure periods of 9, 30, and 70 years, which do not correlate well with the temporary and highly variable nature of construction activities. The California Office of Environmental Health Hazard Assessment has not identified short-term health effects from DPM. Construction is temporary and would be transient throughout the site (i.e., move from location to location) and would not generate emissions in a fixed location for extended periods, which would limit the exposure of any proximate individual sensitive receptor to TACs.

Additionally, construction is subject to and would comply with California regulations (e.g., CCR, Title 13, Sections 2485 and 2449), which reduce DPM and criteria pollutant emissions from in-use off-road diesel-fueled vehicles and limit the idling of heavy-duty construction equipment to no more than five minutes. In response to the increase in warehouse development in California, the State of California Department of Justice issued a memorandum in March 2021, entitled *Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act (Memorandum)*. The

Memorandum encourages warehouse projects to implement certain best practices, one of which recommends that construction equipment not in use for more than three minutes be turned off. Although the Project proposes a self-storage facility and not a warehouse, these regulations would further reduce nearby sensitive receptors' exposure to temporary and variable DPM emissions. Given the temporary and intermittent nature of construction activities likely to occur within specific locations on the Project site (i.e., construction is not likely to occur in any one location for an extended time), the dose of DPM that any one receptor is exposed to would be limited. Therefore, considering the relatively short duration of DPM-emitting construction activity at any one location, and the highly dispersive properties of DPM, sensitive receptors would not be exposed to substantial concentrations of construction-related TAC emissions.

A Construction Health Risk Assessment (Construction HRA) (7528 North Bellaire Avenue Mixed-Use Project Health Risk Assessment, Kimley-Horn, June 2024) was conducted based on the SCAQMD's Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis and the SCAQMD Risk Assessment Procedures and the guidance from the California Office of Environmental Health Hazard Assessment; see **Appendix 4.3-2**.

Construction Sources. Construction activities generate DPM emissions from the use of off-road, heavy-duty diesel equipment for demolition; site preparation (e.g., clearing, grading); building construction; paving; application of architectural coatings; on-road truck travel; and other miscellaneous activities. For construction activity, DPM is the primary toxic air contaminant of concern. On-road diesel-powered haul trucks traveling to and from the construction area to deliver materials and equipment are less of a concern because they would not stay on the site for long durations. Diesel exhaust from construction equipment operating at a site poses a health risk to nearby sensitive receptors.

The Project Health Risk Assessment (**Appendix 4.3-2**) calculates risk based on exposure to construction concentrations during the 18 months of the exposure duration. As discussed in **Appendix 4.3-2**, construction emissions would result in a maximum cancer risk of 7.89 in one million, which would be below the SCAQMD's maximum individual cancer risk threshold of 10 in one million. Therefore, Project construction activities would result in a less-than-significant impact concerning carcinogenic risk. Additionally, the highest maximum chronic risk hazard index from Project construction emissions would be 0.012, which would be below the SCAQMD's maximum non-cancer risk hazard index threshold of 1.0. Therefore, Project construction would result in a less than significant impact concerning carcinogenic risk and non-carcinogenic hazards, and no mitigation is required.

Operational Sources. The CARB Land Use Handbook includes recommendations for siting new sensitive land uses near specific sources of air pollution, such as distribution centers. The recommended minimum separation between sensitive land uses and existing sources of pollutants is intended to reduce health risks from air pollution. Based on CARB recommendations, setting new sensitive receptors within 1,000 feet of a warehouse that generates more than 100 trucks per day should be avoided. According to the Project's trip generation estimates, the Project would generate approximately 353 daily trips, of which 22 trips[11] can be attributed to trucks. Additionally, the Project is a self-storage facility and would not be used for manufacturing or distribution purposes. Large heavy-duty trucks are not anticipated at the Project site. Trucks at the Project site would likely consist of moving vans and moving trucks. Therefore,

[11] Truck trips were calculated using the fleet mix from CalEEMod. Of the 353 total daily vehicle trips, approximately six percent are estimated to be light-, medium-, heavy-duty, or other vehicle trips.

considering the anticipated number of daily trips, types of trucks on the Project site, and DPM's highly dispersive properties, nearby sensitive receptors would not be exposed to substantial concentrations of operational TAC emissions. Impacts would be less than significant, and no mitigation is required.

### *4.3d Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*

**Less than Significant Impact.**

Construction. Odors that could be generated by construction activities are required to follow SCAQMD Rule 402 to prevent odor nuisances on sensitive land uses. SCAQMD Rule 402, Nuisance, states:

> *A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.*

During construction, emissions from construction equipment, such as diesel exhaust, and volatile organic compounds from architectural coatings and paving activities may generate odors. However, these odors would be temporary, are not expected to affect a substantial number of people, and would disperse rapidly. Therefore, Project constructions would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. Impacts would be less than significant, and no mitigation is required.

Operations. The SCAQMD CEQA Air Quality Handbook identifies certain land uses as sources of odors. These land uses include agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding. The Project would not include any of the land uses that have been identified by the SCAQMD as odor sources. Therefore, Project operations would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. Impacts would be less than significant, and no mitigation is required.

**Mitigation Measures**

No mitigation is required.

## 4.4 Biological Resources

Information and analysis in this section is based in part on data provided in the Tree Report (Lisa Smith, The Tree Resource, November 2024); see **Appendix 4.4-1: Tree Report**.

| Environmental Issue | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **Would the Project:** | | | | |
| a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? | | | | X |
| b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? | | | | X |
| 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? | | | | X |
| 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? | | | X | |
| e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | | | X | |
| 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? | | | | X |

## Impact Analysis

*4.4a Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?*

**No Impact.** The Project site is in an urbanized area and is occupied by a single-family residential use. Urban development surrounds the Project site, as summarized in **Table 2.2-3**. On-site vegetation is limited to ornamental landscaping (i.e., grass, trees, and shrubs) along the Project site frontage and within the Project site. No native habitat is present on or near the Project site. Based on a review of the existing onsite and surrounding conditions, no candidate, sensitive, or special-status plant or wildlife species are present on or near the Project site. Therefore, the Project would not have an adverse effect on any candidate, sensitive, or special-status plant or wildlife species. No impact would occur, and no mitigation is required.

*4.4b Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?*

*4.4c Would the Project have a substantial adverse effect on state or federally-protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

**No Impact.** The Project site is in an urbanized area and is occupied by a single-family residential use. There are no riparian habitats, sensitive natural communities, or State or federally protected wetlands on the Project site or in its immediate vicinity.[12] Therefore, the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. result in no impacts concerning riparian habitat or wetlands, and no mitigation is required.

*4.4d Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?*

**Less Than Significant Impact.** Wildlife corridors are physical connections that allow wildlife to move between areas of suitable habitat in both undisturbed and fragmented landscapes. The Project site is located in an urbanized area of North Hollywood. The Project site is vacant/unimproved except for one vacant single-family residential dwelling. Also, the Project site is surrounded by roadways and residential/industrial land uses; see **Table 2.2-3: Surrounding Land Uses**. The Project site is devoid of scenic resources. The Project site is surrounded by roadways and residential/industrial land uses. The Project site is not located in a Biological Resources Area or a Significant Ecological Area per the City's General Plan. Additionally, there are no waterways located in the Project's vicinity that are used by migratory fish, and there are no wildlife nursery sites in the Project area.

The Project site contains ornamental vegetation (i.e., grass, shrubs, and trees) that would be cleared and graded to allow for the proposed mixed-use development. Although unlikely, the existing onsite

[12] United States Fish and Wildlife. *National Wetlands Inventory.* Retrieved from https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/.

vegetation has the potential to support nesting migratory birds. The Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFGC) are intended to protect migratory birds. Under MBTA provisions, it is unlawful "by any means or manner to pursue, hunt, take, capture (or) kill" any migratory birds except as permitted by regulations issued by the USFWS. The term "take" is defined by USFWS regulation to mean to "pursue, hunt, shoot, wound, kill, trap, capture or collect" any migratory bird or any part, nest, or egg of any migratory bird covered by the conventions, or to attempt those activities. In addition, the CFGC extends protection to non-migratory birds identified as resident game birds (CFGC §3500) and any birds in the orders Falconiformes or Strigiformes (birds-of-prey) (CFGC §3503). The Project would be required to comply with the MBTA and CFGS to reduce potential impacts on migratory bird species that could potentially nest in trees. Therefore, following compliance with the relevant regulatory framework (i.e., MBTA and CFGC), the Project's potential impacts on nesting migratory birds would be less than significant.

*4.4e Would the Project conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

**Less Than Significant Impact.** A significant impact would occur if the Project would conflict with applicable local regulations protecting biological resources. In the City of Los Angeles, biological resource protections are governed primarily by the Protected Tree Ordinance (City Ordinance No. 177404), which regulates the removal and replacement of specific native tree species. As amended, the ordinance applies to all Oak trees indigenous to California (*excluding Scrub Oak or Quercus dumosa*), as well as Southern California Black Walnut (*Juglans californica*), Western Sycamore (*Platanus racemosa*), California Bay (*Umbellularia californica*), Mexican Elderberry (*Sambucus mexicana*), and Toyon (*Heteromeles arbutifolia*).

A Tree Report prepared for the Project site (included as Appendix 4.4-1 of this IS/MND) identified 32 existing trees. None of the on-site trees qualify as protected species under the City's Protected Tree Ordinance. The Project would involve the removal of all 32 non-protected trees. Tree removal and replacement would comply with applicable City standards and permitting procedures.

*Because no protected trees are located on the Project site and the Project would comply with City tree replacement requirements, the Project would not conflict with local biological resource policies or ordinances. Therefore, impacts would be less than significant, and no mitigation is required.4.4f Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

**No Impact.** The Project site is not located within the boundaries of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, the Project would not conflict with the provisions of such plans. No impact would occur, and no mitigation is required.

**Mitigation Measures**

No mitigation is required.

## 4.5 Cultural Resources

Information and analysis in this Section is based primarily on the data provided in the following sources:

- Archaeological Resources Technical Memorandum for the 7528 North Bellaire Avenue Mixed-Use Project in the City of Los Angeles, Los Angeles County, California ("Archaeological Resources Memorandum") (Kimley-Horn and Associates, Inc., March 2024); see **Appendix 4.5-1: Archaeological Resources Memorandum.**
- Phase 1 Historic Resource Assessment Memorandum for 7528 N. Bellaire Avenue, Los Angeles, Los Angeles County, California ("Historic Assessment") (ASM Affiliates, Inc., June 2024).; see **Appendix 4.5-2: Historic Assessment Memorandum**.

| Environmental Issue | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **Would the Project:** | | | | |
| a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5? | | | | X |
| b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? | | X | | |
| c) Disturb any human remains, including those interred outside of dedicated cemeteries? | | | X | |

### Impact Analysis

*4.5a Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?*

**No Impact.** State CEQA Guidelines §15064.5 defines "historic resources" as resources listed in the California Register of Historical Resources, or determined to be eligible by the California Historical Resources Commission for listing in the California Register of Historic Resources.[13] CEQA allows local historic resource guidelines to serve as the California Register of Historic Resources criteria if enacted by local legislation to function as the equivalent of the State criteria. The Project site is occupied by a vacant single-family residential dwelling (circa 1938, approximately 924 SF) and various accessory structures/sheds (year of construction unknown, approximately 900 SF). As noted in **Appendix 4.5-2**, the Project site is not within either a Historic Preservation Review Area, nor a Historical Preservation Overlay Zone, and is not identified as an eligible resource in the Los Angeles Historic Resources Inventory.

The Historical Resources Assessment evaluated the Project site against the criteria outlined in the National Register of Historic Places, California Register of Historical Resources, and City of Los Angeles Historic Cultural Monuments to determine its historical significance. As concluded in **Appendix 4.5-2**, none of the existing onsite structures qualify as historical resources pursuant to State CEQA Guidelines §15064.5.

[13] California PRC §5020.1(k), §5024.1(g)

Therefore, the Project would not cause an adverse change in the significance of a historical resource pursuant to State CEQA Guidelines §15064.5. No impact would occur, and no mitigation is required.

### *4.5b Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?*

**Less Than Significant Impact With Mitigation Incorporated.** An archaeological resources study was completed to determine whether the Project site contains, or could reasonably contain, archaeological resources; see **Appendix 4.5-1**. A cultural resources records search, pedestrian survey, and additional research were conducted to identify previously recorded and potential archaeological resources within the Project site.

A cultural resources records search was conducted on March 6, 2024, through the South Central Coastal Information Center (SCCIC) for the Project area and a 0.5-mile buffer. The results indicated that nine previous cultural studies were conducted within 0.5 miles of the Project site, though no cultural resources were recorded. Additionally, the SCCIC results indicated that no cultural resources studies have taken place, nor have any cultural resources been recorded, within the Project site. A pedestrian survey of the entire Project site was conducted on March 12, 2024, to identify the presence of any surface archaeological resources. The survey covered 100 percent of the Project site. Any visible surface exposures were carefully inspected. However, the entire Project site was heavily vegetated, and surface visibility was very poor, averaging approximately 15 percent. No archaeological resources were identified during the survey. Additionally, a review of resource databases and repositories did not result in the identification of any archaeological resources in the Project area.

The cultural resources records search, pedestrian survey, and additional research described above did not identify archaeological resources within the Project site. However, the Project site had never been previously surveyed, and surface visibility was very poor. Additionally, the research effort concluded that the Project site's archaeological sensitivity is moderate due to the presence of Holocene-aged alluvial sands, lack of previous development on portions of the Project site, and knowledge of ethnographic Tongva villages in the region. The Project would include ground-disturbing activities that have the potential to unearth undocumented archaeological resources. Therefore, the Project could cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines §15064.5. The Project would incorporate Mitigation Measure (MM) CUL-1, which requires an additional pedestrian survey following clearing and grubbing, and Condition of Approval (COA) CUL-1, which addresses the inadvertent discovery of archaeological resources. With MM CUL-1 and COA CUL-1 incorporated, the Project would not cause a substantial adverse change in the significance of an archaeological resource. Impacts would be less than significant with mitigation incorporated.

### *4.5c Would the Project disturb any human remains, including those interred outside of dedicated cemeteries?*

**Less Than Significant Impact.** The archaeological records search and field survey did not reveal any resources known to contain human remains within or near the Project site. No dedicated cemeteries are on or near the Project site. However, the Archaeological Resources Memorandum concluded that the Project site's archaeological sensitivity is moderate. Therefore, ground-disturbing construction activities could disturb human remains.

State Health and Safety Code (HSC) §§7050.5, 7051, and 7054 collectively address the illegality of interference with human burial remains, as well as the disposition of Native American burials in

archaeological sites. The law protects such remains from disturbance, vandalism, or inadvertent destruction, and establishes procedures to be implemented if Native American skeletal remains are discovered during a project's construction, including the treatment of remains before, during, and after evaluation and reburial procedures.

If human remains are found, those remains would require proper treatment in accordance with applicable laws, including HSC §§7050.5-7055 and PRC §5097.98 and §5097.99. HSC §§7050.5-7055 describes the general provisions for the treatment of human remains. Specifically, HSC §7050.5 prescribes the requirements for the treatment of any human remains that are accidentally discovered during excavation of a site. HSC §7050.5 also requires that all activities cease immediately and that a qualified archaeologist and Native American monitor be contacted immediately. As required by state law, the procedures set forth in PRC §5087.98 would be implemented, including evaluation by the County Coroner and notification of the NAHC. The NAHC would then designate the Most Likely Descendant (MLD) of the unearthed human remains. Therefore, following compliance with the established regulatory framework (i.e., HSC §§7050.5-7055 and PRC §§5097.98 and 5097.99), the Project's potential impacts concerning disturbances to any human remains, including those interred outside of dedicated cemeteries would be less than significant, and no mitigation is required.

**Condition of Approval**

**COA CUL-1** **Archaeological Resource Inadvertent Discovery.** In the event that any subsurface archaeological resources are encountered unexpectedly at the Project site during construction or the course of any ground-disturbing activities, all such activities shall halt immediately, at which time the Project Applicant shall notify the City and consult with a qualified archaeologist to implement the following procedures associated with the inadvertent discovery of archaeological resources:

- The Project Applicant shall retain a qualified archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards (PQS) to prepare a treatment and disposition plan for any discovered archaeological resource. The qualified archaeologist shall retain an archaeological monitor who shall be present during further ground-disturbing activities on the Project site, including peripheral activities, such as sidewalk replacement, utilities work, and landscaping, which may occur adjacent to the Project site.
- A 50-foot buffer around any find shall be established, subject to modification by the qualified archaeologist, within which construction activities shall not be allowed to continue around the find until work is allowed to resume in accordance with the treatment and disposition plan. Ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated as part of a treatment and disposition plan. Work shall be allowed to continue outside of the buffer area.
- All archaeological resources unearthed by Project development activities shall be evaluated by the qualified archaeologist. If a resource is determined by the qualified archaeologist to constitute a "historical resource" pursuant to State CEQA Guidelines Section 15064.5(a) or a "unique archaeological resource" pursuant to Public Resources Code Section 21083.2(g), the qualified archaeologist shall coordinate with the applicant and the City to develop a formal treatment plan that would serve to reduce impacts to the resources. The treatment plan established for the resources

shall be in accordance with State CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If, in coordination with the City, it is determined that preservation in place is not feasible, appropriate treatment of the resource shall be developed by the qualified archaeologist in coordination with the City and may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any archaeological material collected shall be curated at a public, non-profit institution with a research interest in the materials if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be donated to a local school, Tribe, or historical society in the area for educational purposes. If the inadvertent discovery identifies a tribal cultural resource, the applicant shall comply with the inadvertent discovery condition for tribal cultural resources.

- The frequency of required archaeological monitoring shall be based on the rate of excavation and grading activities, the materials being excavated (younger sediments vs. older sediments), the depth of excavation, and, if found, the abundance and type of archaeological resources encountered. Full-time monitoring may be reduced to part-time inspections or ceased entirely if determined adequate by the qualified archaeologist. Prior to any further ground-disturbing activities on the Project site, Archaeological Sensitivity Training shall be given to applicable construction personnel. The training session shall be carried out by the qualified archaeologist and shall focus on how to identify archaeological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event.
- All artifacts, other cultural remains, records, photographs, and other documentation shall be curated by an appropriate curation facility. All fieldwork, analysis, report production, and curation shall be fully funded by the applicant.
- The treatment and disposition plan shall be submitted to the City prior to any further ground-disturbing activities continuing within the buffer area. Recommendations contained therein shall be implemented throughout any further ground disturbance activities.

**Mitigation Measures**

**MM CUL-1** **Pedestrian Survey.** An archaeologist who meets the Secretary of the Interior Professional Qualifications in Archaeology (Project Archaeologist) shall conduct a survey of the Project site after clearing and grubbing to better identify any surface material that was unable to be identified during the initial survey. If archaeological or cultural resources are exposed during the pedestrian survey, then the procedures outlined in COA CUL-1 shall be implemented.

## 4.6 Energy

Energy calculations and results are included in **Appendix 4.6-1: Energy Modeling Data** and are summarized below.

| Environmental Issue | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **Would the Project:** | | | | |
| a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? | | | X | |
| b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? | | | X | |

### Energy Background

Energy consumption is analyzed due to the potential direct and indirect environmental impacts associated with the Project. Such impacts include the depletion of nonrenewable resources and emissions of pollutants during both construction and long-term operational phases. The energy resources considered in this analysis are electricity, diesel fuel, and gasoline.

**Electricity.** Electricity as a utility is a man-made resource. Production of electricity requires the consumption or conversion of various resources (e.g., water, wind, oil, gas, coal, solar, geothermal, and nuclear) into energy. Generated electricity is distributed through a network of transmission and distribution lines referred to as a power grid. Conveyance of electricity through transmission lines is typically responsive to market demands. Delivery of electricity involves a number of system components, including substations and transformers that lower transmission line power (voltage) to a level appropriate for onsite distribution and use.

Energy capacity, or electrical power, is generally measured in watts (W) while energy use is measured in watt-hours (Wh). For example, if a light bulb has a capacity rating of 100 W, the energy required to keep the bulb on for 1 hour would be 100 Wh. If ten 100-W bulbs were on for 1 hour, the energy required would be 1,000 Wh or 1 kilowatt-hour (kWh). On a utility scale, a generator's capacity is typically rated in megawatts (MW), which is one million watts, while energy use is measured in megawatt-hours (MWh) or gigawatt-hours (GWh), which is one billion watt-hours.

The LADWP provides electrical services to the Project site. LADWP serves approximately 4 million people in the City and is the nation's largest municipal electric utility.[14] Over the past 15 years, electricity generation in California has undergone a transition. Historically, California has relied heavily on oil- and

[14] Los Angeles Department of Water & Power (LADWP) (2022), Power Strategic Long-Term Resource Plan. Retrieved from https://www.ladwp.com/sites/default/files/2023-08/2022%20LADWP%20Power%20Strategic%20Long-Term%20Resource%20Plan_0.pdf, accessed July 2, 2024.

gas-fired plants to generate electricity. Spurred by regulatory measures and tax incentives, California's electrical system has become more reliant on renewable energy sources, including cogeneration, wind energy, solar energy, geothermal energy, biomass conversion, transformation plants, and small hydroelectric plants. Unlike petroleum production, electricity generation is not usually tied to the location of the fuel source and can be delivered over great distances via the electrical grid.

**Natural Gas**. The Southern California Gas Company (SoCalGas) provides natural gas services to the City and County. The Project does not propose natural gas conveyance or consumption; thus, it is excluded from this analysis.

## Energy Use

Energy usage is typically quantified using the British Thermal Unit. Total energy usage in California was 7,388 trillion British Thermal Units in 2021 (the most recent year for which this specific data is available).[15] Of California's total energy usage, the breakdown by sector is 42.6 percent transportation, 22.5 percent industrial, 17.4 percent commercial, and 17.6 percent residential.[16] Electricity and natural gas consumption in California is generally attributed to stationary users such as residences, commercial, and industrial facilities, whereas petroleum consumption is generally attributed to transportation-related energy use. In 2023, California's taxable gasoline sales (including aviation gasoline) totaled 13,584,697,639 gallons, while taxable diesel fuel sales totaled 3,006,777,156 gallons.[17]

The electricity consumption attributable to the County from 2012 to 2022 is shown in **Table 4.6-1: Electricity Consumption in Los Angeles County 2012-2022**. The County's electricity consumption fluctuated with increases and decreases occurring annually.

**Table 4.6-1: Electricity Consumption in Los Angeles County 2012-2022**

| Year | Electricity Consumption (in millions of kilowatt hours) |
|---|---|
| 2012 | 69,167 |
| 2013 | 68,280 |
| 2014 | 69,860 |
| 2015 | 69,460 |
| 2016 | 69,364 |
| 2017 | 68,591 |
| 2018 | 67,834 |
| 2019 | 66,741 |
| 2020 | 65,566 |
| 2021 | 66,003 |
| 2022 | 68,485 |
| Source: California Energy Commission, *Electricity Consumption by County*, http://www.ecdms.energy.ca.gov/, accessed June 28, 2024. | |

[15] U.S. Energy Information Administration, *Table F35: Total energy consumption, price, and expenditure estimates, 2021,* https://www.eia.gov/state/seds/data.php?incfile=/state/seds/sep_fuel/html/fuel_te.html&sid=CA, accessed June 28, 2024.

[16] U.S. Energy Information Administration, *California State Profile and Energy Estimates*, *California Energy Consumption by End-Use Sector, 2022*, https://www.eia.gov/state/?sid=CA#tabs-2, accessed June 28, 2024.

[17] California Department of Tax and Fee Administration, *January 2023 – Motor Vehicle Fuel 10 Year Reports*, https://www.cdtfa.ca.gov/taxes-and-fees/spftrpts.htm, accessed June 28, 2024.

## Impact Analysis

*4.6a Would the Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?*

**Less Than Significant Impact.**

Construction. The energy associated with Project construction includes electricity consumption (i.e., associated with water for dust control, diesel fuel consumption (associated with on-road hauling trips and vendor trips), and gasoline fuel consumption (associated with on-road worker commute trips). Construction energy calculations for the Project are provided in **Table 4.6-2: Energy Use During Construction** and are discussed in more detail below.

**Table 4.6-2: Energy Use During Construction**

| Project Source | Total Construction Energy | Los Angeles County Annual Energy | Percentage Increase Countywide |
|---|---|---|---|
| **Electricity Use** | | **GWh** | |
| Water Use[1] | 0.0035 | 68,485 | <0.0001% |
| **Diesel Fuel Use** | | **Gallons** | |
| On-Road Trips[2] | 8,573 | 535,939,687 | 0.0016% |
| Off-Road Equipment[3] | 40,203 | | 0.0075% |
| Diesel Fuel Use Total | 48,776 | | 0.0091% |
| **Gasoline Use** | | **Gallons** | |
| On-Road Trips | 11,923 | 3,369,809,065 | 0.0004% |

Notes:
1. Construction water use based on acres disturbed per day per construction sequencing and estimated water use per acre.
2. On-road trip diesel fuel use based on VMT from CalEEMod and fleet-average fuel consumption in gallons per mile from EMFAC2021 in Los Angeles County for 2027.
3. Off-road equipment diesel fuel use was calculated based on CalEEEMod emissions outputs and conversion ratios from the Climate Registry.

Source: Refer to energy calculations in **Appendix 4.3-1**.

**Electricity Use**

Water Use**.** Electricity use associated with water use for dust control during construction is calculated based on total water use and the energy intensity for water supply, distribution, and treatment. The total number of gallons of water used is calculated based on the acreage disturbed during grading and site preparation, as well as the daily watering rate per acre disturbed. The total acres disturbed are calculated using the methodology described in CalEEMod User's Guide Appendix C Chapter 4.2. The water application rate of 3,020 gallons per acre per day is from the Air and Waste Management Association's Air Pollution Engineering Manual (1992).

The energy intensity value is based on the CalEEMod default energy intensity per gallon of water for the South Coast Hydrologic Region. The Project's total electricity demand associated with water use for dust control during construction would total approximately 0.0035 GWh; see **Table 4.6-2**.

**Diesel Fuel Use**

On-Road Trips. The diesel fuel associated with on-road construction mobile trips is calculated based on VMT from vehicle trips (i.e., worker, vendor, and hauling), the CalEEMod default diesel fleet percentage, and vehicle fuel efficiency in miles per gallon (MPG). VMT for the entire construction period is calculated

based on the number of trips multiplied by the trip lengths for each phase shown in CalEEMod. Construction fuel was calculated based on CalEEMod emissions outputs and conversion ratios from the Climate Registry. The Project's on-road diesel fuel consumption during construction would total approximately 8,573 gallons; see **Table 4.6-2**.

Off-Road Equipment. Similarly, the construction diesel fuel associated with the off-road construction equipment is calculated based on CalEEMod emissions outputs and conversion ratios from the Climate Registry. The Project's off-road equipment diesel fuel consumption during construction would total approximately 40,203 gallons; see **Table 4.6-2**.

The Project's combined diesel fuel use consumption from on-road and off-road sources during construction would total 48,776 gallons; see **Table 4.6-2**.

**Gasoline Use**

On-Road Trips. The gasoline fuel associated with on-road construction mobile trips is calculated based on VMT from vehicle trips (i.e., worker, vendor, and hauling), the CalEEMod default gasoline fleet percentage, and vehicle fuel efficiency in MPG using the same methodology as the construction on-road trip diesel fuel calculation discussed above. The Project's on-road gasoline use during construction would total approximately 11,923 gallons; see **Table 4.6-2**.

**Construction Energy Use Analysis**

As indicated in **Table 4.6-2**, the Project's construction electricity use would be negligible, as it would represent less than 0.0001 percent of Los Angeles County's 2027 electricity use. As previously mentioned, LADWP would provide electrical service to the Project site. To assess and meet growing energy demands, the LADWP releases Integrated Resource Plans. The latest 2022 Final Power Strategic Long-Term Resource Plan reports that LADWP's total energy sales are projected to be 20,834 GWh of electricity in 2025.[18] The Project's construction electricity use would represent less than one percent of LADWP's projected sales of 20,834 GWh. Therefore, it is anticipated that LADWP's existing and planned electricity capacity and electricity supplies would be sufficient to serve the Project's temporary construction electricity demand.

In 2027, Californians are anticipated to use approximately 13,169,065,097 gallons of gasoline and approximately 3,169,833,123 gallons of diesel fuel.[19] Los Angeles County's annual gasoline fuel use in 2027 is anticipated to total 3,369,809,065 gallons of gasoline and approximately 535,939,687 gallons of diesel fuel. The Project's construction gasoline use would represent approximately 0.0004 percent of the County's annual gasoline use, and construction diesel fuel use would represent approximately 0.0091 percent of the County's annual diesel fuel use. Based on the Project's relatively low total construction fuel use proportional to the County's annual fuel use, the Project would not substantially affect existing energy fuel supplies or resources. New capacity or additional sources of construction fuel are not anticipated to be required.

[18] Los Angeles Department of Water & Power (LADWP) (2022), Power Strategic Long-Term Resource Plan. Retrieved from https://www.ladwp.com/sites/default/files/2023-08/2022%20LADWP%20Power%20Strategic%20Long-Term%20Resource%20Plan_0.pdf, accessed July 2, 2024.

[19] California Air Resources Board, *EMFAC 2021 Emissions Inventory*. Retrieved from CARB Website: https://arb.ca.gov/emfac/emissions-inventory/0a2cdd4bc96187e60199e39957d9118bd835b622, accessed July 2, 2024.

Transportation fuels (gasoline and diesel) are produced from crude oil, which can be domestic or imported from various regions around the world. Based on current proven reserves, current crude oil production would be sufficient to meet demand until 2050.[20] As such, it is expected that existing and planned transportation fuel supplies would be sufficient to serve the Project's temporary construction gasoline and diesel fuel demands.

The Project's construction energy use would primarily be in the form of diesel fuel (e.g., mobile construction equipment). There are no unusual characteristics that would necessitate the use of diesel construction equipment that would be less energy-efficient than at comparable construction sites in the region or state. Contractors would be required to monitor air quality emissions of construction activities using applicable regulatory guidance, such as from the SCAQMD CEQA Guidelines. Additionally, construction activities are subject to compliance with California regulations (e.g., CCR, Title 13, Sections 2485 and 2449), which reduce diesel PM and criteria pollutant emissions from in-use off-road diesel-fueled vehicles and limit the idling of heavy-duty construction equipment to no more than five minutes. This requirement indirectly relates to construction energy conservation because when air pollutant emissions are reduced through monitoring and the efficient use of equipment and materials, energy use is reduced. Project diesel construction equipment would also be required to comply with the latest EPA and CARB engine emissions standards. These engines utilize highly efficient combustion to minimize unnecessary fuel consumption. There are no aspects of the Project that would foreseeably result in the inefficient, wasteful, or unnecessary use of energy during construction activities. Due to increasing transportation costs and fuel prices, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary energy use during construction.

There is growing recognition among developers and retailers that sustainable construction is not prohibitively expensive and that there is a significant cost-saving potential in green building practices.[21] Substantial reduction in energy inputs for construction materials can be achieved by selecting building materials composed of recycled materials that require substantially less energy to produce than non-recycled materials. The Project-related incremental increase in the use of energy bound in construction materials such as asphalt, steel, concrete, pipes, and manufactured or processed materials (e.g., lumber and gas) would not substantially increase energy demand compared to the overall local and regional demand for construction materials.

As discussed above, the Project's construction energy use from the entire construction period would increase fuel use in the County by less than one percent. It should be noted that the State CEQA Guidelines Appendix G criteria require that the Project does not result in wasteful, inefficient, or unnecessary consumption of energy resources and that the Project does not conflict with a state or local plan for renewable energy or energy efficiency. A less than one percent increase in temporary demand is not anticipated to trigger the need for additional capacity. Project construction energy use would have a nominal effect on the local and regional energy supplies. Additionally, construction energy use would be

[20] US Energy Information Administration. *California Energy Consumption Estimates*. Retrieved from EIA Website: https://www.eia.gov/state/print.php?sid=CA, accessed July 2, 2024.

[21] U.S. Green Building Council, *Green Building Costs and Savings*, https://www.usgbc.org/articles/green-building-costs-and-savings, accessed July 2, 2024.

temporary and would cease once the Project is fully developed. As such, Project construction would have a nominal effect on the local and regional energy supplies.

As stated above, there are no unusual characteristics that necessitate the use of construction equipment that would be less energy-efficient than at comparable construction sites in the region or state. Additionally, it is expected that the Project's construction fuel use would not be any more inefficient, wasteful, or unnecessary than other similar development projects. Therefore, Project construction activities would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources. Impacts would be less than significant, and no mitigation is required.

Operations. The Project's operational energy consumption would occur from electricity use (building demands and water conveyance), and transportation-related fuel (diesel and gasoline) use. Annual energy use during Project operations is shown in **Table 4.6-3: Project Annual Energy Use During Operations**. It is noted that the Project's unmitigated energy consumption estimates are provided in **Table 4.6-3** to provide a conservative impact analysis.

**Table 4.6-3: Project Annual Energy Use During Operations**

| Source | Annual Operational Energy[4] | Los Angeles County Annual Energy | Percentage Increase Countywide |
|---|---|---|---|
| **Electricity Use[1, 2]** | **GWh** | | |
| Electricity Demand and Water Conveyance | 1.29 | 68,485 | 0.0019% |
| **Diesel Use** | **Gallons** | | |
| Mobile[3] | 5,225 | 535,939,687 | 0.0010% |
| **Gasoline Use** | **Gallons** | | |
| Mobile[2] | 52,199 | 3,369,809,065 | 0.0015% |

Notes:
1. The electricity and water usage are based on Project-specific estimates and CalEEMod defaults.
2. The Project would not use natural gas; therefore, the "mitigated" electricity use column accounts for a four (4) percent increase in electricity consumption to account for this.
3. Calculated based on the mobile source fuel based on VMT and fleet-average fuel consumption (in gallons per mile) from EMFAC2021 for the operational year 2027.
4. Annual Operational Energy represents the mitigated operational energy from CalEEMod.

Source: Refer to energy calculations in **Appendix 4.3-1.**

**Electricity Use.** The Project's operational electricity use is based on electricity demand for buildings and water conveyance; see **Appendix 4.6-1**. The Project's annual operational electricity use would total approximately 1.29 GWh, of which approximately 1.17 GWh is attributed to building electricity demand and 0.12 GWh is attributed to water conveyance; see **Appendix 4.6-1**. The Project's operational electricity use is estimated based on CalEEMod energy consumption factors by land use type; see **Appendix 4.6-1**.

The Project's operational electricity use from water conveyance is estimated based on the annual water use, the energy intensity factor, and the CalEEMod default energy intensity per gallon of water for Los Angeles County. The Project's operational annual water demand, which is based on the CalEEMod default rates, would total approximately 17.8 million gallons. This estimated water demand would require approximately 0.12 GWh per year for conveyance and treatment, which is 9.30 percent of the Project's total electricity use. The Project's operational annual electricity use would constitute less than one percent of the County's electricity use; see **Table 4.6-3**.

Gasoline and Diesel Fuel Use. The Project's operational gasoline and diesel fuel associated with on-road vehicular trips is calculated based on the total VMT calculated for the Project from CalEEMod and average fuel efficiency from the EMFAC model. The EMFAC fuel efficiency data incorporates the Pavley Clean Car Standards and the Advanced Clean Cars Program.[22] As presented in **Table 4.6-3**, the Project's total operational gasoline and diesel fuel use from on-road trips would total approximately 52,199 gallons per year and 5,225 gallons per year, respectively.

Operational Energy Use Analysis. Californians used 287,826.1 GWh of electricity in 2022, of which the County used 68,484.96 GWh.[23] The Project's unmitigated operational electricity use would represent a nominal portion of electricity used in the State and County. Further, as previously mentioned, LADWP energy sales for 2025 are forecasted to be 20,834 GWh. The Project's estimated operational energy demand of 1.29 GWh would represent approximately 0.0062 percent of LADWP energy sales, which is negligible and within the anticipated service capabilities of LADWP.

The County's annual gasoline use in 2027 is anticipated to be 3,369,809,065 gallons, and diesel fuel use is anticipated to be 535,939,687 gallons. Expected Project operational gasoline and diesel use would represent approximately 0.0015 percent of gasoline use and 0.0010 percent of diesel fuel use in the County.

The Project's energy consumption represents less than one percent of the County's energy consumption. Project operations would not substantially affect existing energy supplies or resources. Project operations would comply with applicable energy standards, and new capacity would not be required. Impacts would be less than significant.

Compliance with Energy Efficient Measures. As discussed above, California's Energy Efficiency Standards for Residential and Non-Residential Buildings create uniform building codes to reduce California's energy use and provide energy efficiency standards for residential and non-residential buildings. These standards are incorporated within the California Building Code and are expected to substantially reduce the growth in electricity use. CCR 2022 Title 24 standards for new residential and nonresidential buildings focus on encouraging electric heat pump technology and use, promoting electric-ready buildings to encourage owners to use cleaner electric heating, cooking, and vehicle charging, expanding solar photovoltaic systems and battery storage systems to reduce reliance on fossil fuel power plants.

Further, the Project would also be required to comply with the City of Los Angeles Green Building Code (L.A. Green Building Code), which incorporates reference to the CALGreen Code. The L.A. Green Building Code, effective January 1, 2020, requires the use of numerous energy conservation measures beyond those required by CCR Title 24. Estimated energy consumption does not take into account reductions provided by adherence to the L.A. Green Building Code. The L.A. Green Building Code contains both mandatory and voluntary green building measures that require energy conservation features that would reduce the Project's electricity demand.

[22] The CARB EMFAC 2017 Technical Documentation from March 2018 notes that emissions are estimated with all current controls active, except Low Carbon Fuel Standards (LCFS). The reason for excluding LCFS is that most of the emissions benefits due to the LCFS come from the production cycle (upstream emissions) of the fuel rather than the combustion cycle (tailpipe). As a result, LCFS is assumed to not have a significant impact on CO2 emissions from EMFAC's tailpipe emission estimates.

[23] California Energy Commission, *California Energy Consumption Database*. http://www.ecdms.energy.ca.gov/Default.aspx, accessed June 2, 2024.

Regarding water energy conservation, the Project would incorporate drought-tolerant landscaping throughout pursuant to regulatory requirements. Water-efficient irrigation controls would also be used in landscaped areas. Comprehensive water conservation strategies would be developed as part of the Project plan development. Buildings would incorporate water-efficient fixtures and appliances to comply with Title 24.

The Project's energy consumption would total less than one percent of the County's corresponding energy sources. Project operations would not substantially affect existing energy supplies or resources. All Project buildings would comply with energy efficiency laws and regulations. Therefore, Project operations would not result in a significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources. Impacts would be less than significant, and no mitigation is required.

### *4.6b Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

**Less Than Significant Impact**. The Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. All of the Project's electricity demands would be served by LADWP. Additionally, the Project would be subject to compliance with Title 24 energy standards, the 2022 CALGreen Code, the LAMC, the L.A. Green Building Code, the City of LA Green New Deal, and Connect SoCal 2024, which contain mandatory conservation measures. These regulations include specific lighting requirements to conserve energy, window glazing to reflect heat, enhanced insulation to reduce heating and ventilation energy usage, and enhanced air filtration. The Project would incorporate these measures, as required. The most recent Title 24 Standards ensure that builders use the most energy-efficient and energy-conserving technologies and construction practices.

CCR Title 24 contains energy efficiency standards for residential and non-residential buildings based on a state mandate to reduce California's energy demand. Specifically, CCR Title 24 addresses several energy efficiency measures that impact energy used for lighting, water heating, heating, and air conditioning, including the energy impact of the building envelope such as windows, doors, skylights, wall/floor/ceiling assemblies, attics, and roofs. Title 24 Part 6 establishes energy efficiency standards for residential and non-residential buildings constructed in the State of California to reduce energy demand and consumption. Because the Project would comply with Title 24 Parts 6 and 11, no conflict with existing energy standards and regulations would occur.

SCAG's Connect SoCal 2024 was adopted in April 2024 by SCAG and was approved by the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA). The Plan integrates transportation, land use, and housing to meet GHG reduction targets set by CARB. The document establishes GHG emissions goals for automobiles and light-duty trucks (per capita passenger vehicle GHG emission reduction target of 19 percent below 2005 levels by 2035), as well as an overall GHG target for the region consistent with both the target date of AB 32 and the post-2020 GHG reduction goals of SB 375. SCAG's 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal 2020), adopted in September 2020, also established GHG emissions goals for automobiles and light-duty trucks, as well as an overall GHG target for the region consistent with both the target date of AB 32 and the post-2020 GHG reduction goals of SB 375. The Project would not conflict with the stated goals of Connect SoCal 2024 or Connect SoCal 2020.

Therefore, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. A less-than-significant impact would occur, and no mitigation is required. Overall, the Project would be designed and constructed in accordance with applicable state and local green building

standards that would serve to reduce the energy demand of the Project. In addition, as discussed above, electricity demand during Project construction and operations would represent a small fraction of LADWP's projected and planned sales. Similarly, as discussed above, the Project's fuel use during construction and operations would also represent a fraction of the 2027 projected fuel use in Los Angeles County.

**Mitigation Measures**

No mitigation is required.

## 4.7 Geology and Soils

Information and analysis in this section is based primarily on the data provided in the following sources:

- Preliminary Geotechnical Evaluation, Proposed Self-Storage Development, 7528 North Bellaire, North Hollywood, California ("Preliminary Geotechnical Evaluation") (LGC Geotechnical, Inc., August 2023); see **Appendix 4.7-1: Preliminary Geotechnical Evaluation**.

| Environmental Issue | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **Would the Project:** | | | | |
| a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: | | | | |
| i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. | | | | X |
| ii) Strong seismic ground shaking? | | | X | |
| iii) Seismic-related ground failure, including liquefaction? | | | X | |
| iv) Landslides? | | | | X |
| b) Result in substantial soil erosion or the loss of topsoil? | | | X | |
| 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? | | | X | |
| 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? | | | X | |
| 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? | | | | X |

| Environmental Issue | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | | X | | |

**Impact Analysis**

*4.7ai Would the Project directly or indirectly cause potential substantial adverse effects, including the risks of loss, or death involving the rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.*

**No Impact.** The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazard of surface faulting to structures for human occupancy. The Alquist-Priolo Earthquake Fault Zoning Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The Alquist-Priolo Earthquake Fault Zoning Act requires the State Geologist to establish regulatory zones, known as "Alquist-Priolo Earthquake Fault Zones," around the surface traces of active faults and to issue appropriate maps. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back from the fault (typically 50 feet). As concluded in the Preliminary Geotechnical Evaluation, the Project site is not located within an Alquist-Priolo Earthquake Fault Zone and thus, the possibility of damage due to ground rupture is considered very low since active faults are not known to cross the site. Therefore, the Project would not directly or indirectly cause potential substantial adverse effects, including the risks of loss or death involving the 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. No impact would occur, and no mitigation is required.

*4.7aii Would the Project directly or indirectly cause potential substantial adverse effects, including the risks of loss, or death involving strong seismic ground shaking?*

**Less Than Significant Impact.** Similar to other areas located in the seismically active Southern California region, the City is susceptible to strong ground shaking during an earthquake. However, LAMC §91.7012, *Construction Requirements and Limitations*, requires that the Project incorporate the Preliminary Geotechnical Evaluation's design recommendations. The Preliminary Geotechnical Evaluation makes preliminary recommendations concerning design parameters, foundations, slabs, and general earthwork and grading, among other factors. The Preliminary Geotechnical Evaluation provides specific design recommendations to provide adequate protection for the proposed development to the extent required to reduce seismic risk to an "acceptable level" as defined by CCR §3721(a). Additionally, the Project's structures would be designed consistent with the most recent version of the California Building Code, which includes universal standards relating to seismic load requirements. The City of Los Angeles Department of Building and Safety would review construction plans to verify compliance with standard engineering practices, the LAMC and CBC, and the Preliminary Geotechnical Evaluation's recommendations, including those concerning strong seismic ground shaking. With the Preliminary

Geotechnical Evaluation's design recommendations incorporated, the Project would not directly or indirectly cause potential substantial adverse effects, including the risks of loss or death involving strong seismic ground shaking. Impacts would be less than significant, and no mitigation is required.

*4.7aiii Would the Project directly or indirectly cause potential substantial adverse effects, including the risks of loss, or death involving seismic-related ground failure, including liquefaction?*

**Less Than Significant Impact.** Liquefaction is a phenomenon where earthquake-induced ground vibrations increase the pore pressure in saturated, granular soils until it is equal to the confining, overburden pressure. When this occurs, the soil can completely lose its shear strength and enter a liquefied state. For liquefaction to occur, three criteria must be met:

1. A source of ground shaking, such as an earthquake, capable of generating soil mass distortions.
2. A relatively loose silty and/or sandy soil.
3. A relatively shallow groundwater table (within approximately 50 feet below ground surface) or completely saturated soil conditions that will allow positive pore pressure generation.

The Project site is not located within a State of California Seismic Hazard Zone for liquefaction potential; thus, the liquefaction potential is low.[24] In addition, Project development itself would not increase the likelihood of liquefaction occurring. Therefore, the Project would not directly or indirectly cause potential substantial adverse effects, including the risks of loss or death involving seismic-related ground failure, including liquefaction. Impacts would be less than significant, and no mitigation is required.

*4.7aiv Would the Project directly or indirectly cause potential substantial adverse effects, including the risks of loss or death involving landslides?*

**No Impact.** Landslides are mass movements of the ground that include rock falls, relatively shallow slumping and sliding of soil, and deeper rotational or transitional movement of soil or rock. The Project site is relatively flat and is not located in an area mapped as an earthquake-induced landslide hazard area.[25, 26] Therefore, the Project would not directly or indirectly cause potential adverse effects, including the risks of loss or death involving landslides. No impact would occur, and no mitigation is required.

*4.7b Would the Project result in substantial soil erosion or the loss of topsoil?*

**Less Than Significant Impact.** Grading and earthwork activities during construction would expose soils to potential short-term erosion by wind and water. A significant impact would occur if a project exposes large areas to the erosional effects of wind or water for a protracted period. As discussed in detail in Response 4.10a, the Project would be subject to compliance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities[27] ("General Permit"), Order WQ 2022-0057-DWQ, and Los Angeles Regional

[24] Appendix 4.7-1: Preliminary Geotechnical Evaluation, pg. 5.

[25] Appendix 4.7-1: Preliminary Geotechnical Evaluation, pg. 5.

[26] California Department of Conservation. (2022). Earthquake Zones of Required Investigation. Available at: https://maps.conservation.ca.gov/cgs/EQZApp/app/

[27] California State Water Resources Control Board. (2022). *National Pollutant Discharge Elimination System (NPDES) General Permit For Stormwater Discharges Associated With Construction And Land Disturbance Activities (General Permit)* Retrieved from: https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2022/wqo_2022-0057-dwq.pdf

Water Quality Control Board Order No. R4-2012-0175-A01, NPDES No. CAS004001, Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles County ("Los Angeles County MS4 Permit"). These regulations include requirements for a stormwater pollution prevention plan (SWPPP), which must include erosion-control and sediment-control best management practices (BMPs) to mitigate potential impacts; see Response 4.10a. Therefore, following compliance with the General Permit and Los Angeles County MS4 Permit requirements, the Project's short-term construction and land disturbance activities would not result in substantial soil erosion or the loss of topsoil. Impacts would be less than significant, and no mitigation is required.

During Project operations, ground surfaces would be covered by the proposed improvements or otherwise stabilized with landscaping and paving. The stormwater generated on-site, along with any sediments contained within the stormwater, would be directed into an on-site infiltration facility to be treated on-site. Therefore, following compliance with Los Angeles County MS4 Permit requirements, the Project's long-term operations would not result in substantial soil erosion or the loss of topsoil. Impacts would be less than significant, and no mitigation is required.

*4.7c Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?*

**Less Than Significant Impact.** Refer to Responses 4.7aiii and 4.7aiv regarding the potential for liquefaction and landslides, respectively. Lateral spreading is a type of liquefaction-induced ground failure associated with the lateral displacement of surficial blocks of sediment resulting from liquefaction in a subsurface layer. As concluded in **Appendix 4.7-1**, due to the very low potential for liquefaction on the Project site, the potential for lateral spreading is also considered to be very low.

Subsidence occurs when the withdrawal of groundwater, oil, or natural gas vertically displaces a large portion of land. Soils that are particularly subject to subsidence include those with high silt or clay content. No large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring, or planned, at the Project site or in the Project site's vicinity. However, the Project's Preliminary Geotechnical Evaluation concluded that subsidence of up to 0.1 foot could occur. The Preliminary Geotechnical Evaluation makes preliminary recommendations concerning design parameters, foundations, slabs, and general earthwork and grading, among other factors. The City of Los Angeles Department of Building and Safety would review construction plans to verify compliance with standard engineering practices, the LAMC and CBC, and the Preliminary Geotechnical Evaluation's recommendations, including those concerning subsidence. Therefore, following compliance with standard engineering practices, the established regulatory framework (i.e., LAMC and CBC), and the Preliminary Geotechnical Evaluation's recommendations, the Project would not be located on a geologic unit or soil that would become unstable and potentially result in subsidence. Impacts would be less than significant, and no mitigation is required.

*4.7d Would the Project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?*

**Less Than Significant Impact.** The Preliminary Geotechnical Evaluation concluded that the Project site's soils have a very low expansion potential. Notwithstanding and as discussed in Response 4.7c, the Preliminary Geotechnical Evaluation includes recommendations concerning design parameters, foundations, slabs, and general earthwork and grading, among other factors. The City of Los Angeles Department of Building and Safety would review construction plans to verify compliance with standard

engineering practices, the LAMC and CBC, and the Preliminary Geotechnical Evaluation's recommendations, including those concerning expansive soils. Therefore, following compliance with standard engineering practices, the established regulatory framework (i.e., LAMC and CBC), and the Preliminary Geotechnical Evaluation's recommendations, the Project would not create substantial direct or indirect risks to life or property concerning expansive soils. Impacts would be less than significant, and no mitigation is required.

*4.7e Would the Project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?*

**No Impact.** There is existing sewer infrastructure available to serve the proposed Project. The Project would connect to the existing sanitary sewer system for wastewater disposal and would not include the use of septic tanks. Therefore, no impact would occur, and no mitigation is required.

*4.7f Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

**Less Than Significant Impact With Mitigation Incorporated.** The Project site is in an urbanized area, has been previously disturbed by past development activities, and contains a single-family dwelling. The Project would require ground-disturbing activities, which may cause an inadvertent discovery of a unique paleontological resource. Therefore, the Project could directly or indirectly destroy a unique paleontological resource or site, or a unique geologic feature. The Project would incorporate MM GEO-1, which outlines the procedure to be followed if paleontological resources are inadvertently discovered. With MM GEO-1 incorporated, the Project's potential impacts concerning directly or indirectly destroying a unique paleontological resource or site or unique geologic feature would be less than significant, and no mitigation is required.

**Mitigation Measures**

**MM GEO-1** **Paleontological Resource Inadvertent Discovery.** In the event that any subsurface paleontological resources are encountered unexpectedly at the Project site during construction or the course of any ground-disturbing activities, all such activities shall halt immediately, at which time the Project Applicant shall notify the City and consult with a qualified paleontologist to implement the following procedures associated with the inadvertent discovery of paleontological resources:

- The Project Applicant shall retain a qualified paleontologist meeting the Society of Vertebrate Paleontology Standards (SVP) to complete a treatment and disposition plan for any discovered paleontological resource. The qualified paleontologist shall retain a paleontological monitor who shall be present during further ground-disturbing activities on the Project site, including peripheral activities, such as sidewalk replacement, utilities work, and landscaping, which may occur adjacent to the Project site.
- A 50-foot buffer around any find shall be established, subject to modification by the qualified paleontologist, within which construction activities shall not be allowed to continue around the find until work is allowed to resume in accordance with the treatment and disposition plan. Ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated as part

of a treatment and disposition plan. Work shall be allowed to continue outside of the buffer area.

- All paleontological resources unearthed by Project development activities shall be evaluated by the qualified paleontologist. The qualified paleontologist or designated paleontological monitor shall recover intact fossils consistent with the treatment plan and notify the City of any fossil salvage and recovery efforts. Typically, fossils can be safely salvaged quickly by a single paleontologist and not disrupt future construction activity. In some cases, larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. In this case, the paleontologist shall have the authority to temporarily direct, divert, or halt construction activity to ensure that the fossil(s) can be removed in a safe and timely manner. Any fossils shall be handled and deposited consistent with the treatment and disposition plan prepared by the paleontological monitor.
- The frequency of required paleontological monitoring shall be based on the rate of excavation and grading activities, the materials being excavated (younger sediments vs. older sediments), the depth of excavation, and, if found, the abundance and type of archaeological resources encountered. Full-time monitoring may be reduced to part-time inspections or ceased entirely if determined adequate by the qualified paleontologist. Prior to any further ground-disturbing activities on the Project site, Paleontological Resource Sensitivity Training shall be given to applicable construction personnel. The training session shall be carried out by a qualified archaeologist and shall focus on how to identify paleontological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event.
- All artifacts, other cultural remains, records, photographs, and other documentation shall be curated by an appropriate curation facility. All fieldwork, analysis, report production, and curation shall be fully funded by the applicant.
- The treatment and disposition plan shall be submitted to the City prior to any further ground-disturbing activities continuing within the buffer area. Recommendations contained therein shall be implemented throughout any further ground disturbance activities.

## 4.8 Greenhouse Gas Emissions

Information and analysis in this section is based primarily on the data provided in the following sources:

- Greenhouse Gas Technical Report for the 7528 N. Bellaire Avenue Project ("GHG Technical Report") (Kimley-Horn and Associates, Inc., July 2024); see **Appendix 4.8-1: Greenhouse Gas Technical Report**.

| Environmental Issue | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **Would the Project:** | | | | |
| a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | | | X | |
| b) Conflict with applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | | | X | |

### Impact Analysis

*4.8a Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*

**Less Than Significant Impact.**

Construction Greenhouse Gas Emissions. The Project would generate direct short-term construction emissions of $CO_2$, $N_2O$, and $CH_4$ from construction equipment and the transport of materials and construction workers to and from the Project site. The GHG emissions only occur during temporary construction activities and would cease once construction is complete. The Project's total construction-related GHG emissions are shown in **Table 4.8-1: Construction-Related Greenhouse Gas Emissions**.

**Table 4.8-1: Construction-Related Greenhouse Gas Emissions**

| Category | $MTCO_2e$ |
|---|---|
| Construction Year 1 (2026) | 523.05 |
| Construction Year 2 (2027) | 77.57 |
| Total Construction Emissions | 601.62 |
| **30-Year Amortized Construction Emissions** | **22.02** |
| Sources: Source: CalEEMod version 2022.1. Refer to **Appendix 4.8-1** for model outputs. | |

As shown, the Project would generate approximately 602 $MTCO_2e$ throughout construction. Construction GHG emissions are typically summed and amortized over 30 years and then added to the operational emissions.[28] The Project's amortized construction emissions would be approximately 22 $MTCO_2e$ per year. Once construction is complete, the generation of these GHG emissions would cease.

[28] The amortization period is based on the standard 30-year assumption of the South Coast Air Quality Management District (South Coast Air Quality Management District, *Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #13,* August 26, 2009).

Operational Greenhouse Gas Emissions. Over its lifetime, the Project would generate long-term operational GHG emissions from direct sources such as the Project-generated vehicular traffic and the operation of any landscaping equipment. Operational GHG emissions would also result from indirect sources, such as off-site generation of electrical power, the energy required to convey water to and wastewater from the Project, the emissions associated with the Project's solid waste, and any fugitive refrigerants from air conditioning or refrigerators.

**Table 4.8-2: Project Greenhouse Gas Emissions** summarizes the Project's GHG emissions and indicates that the Project's unmitigated construction and operational emissions would total approximately 1,080 $MTCO_2e$ annually and would not exceed the SCAQMD 3,000 $MTCO_2e$ per year threshold. The majority of the GHG emissions would be associated with energy source emissions (approximately 50 percent) and non-construction-related mobile sources (approximately 40 percent). Emissions of motor vehicles are controlled by State and Federal standards, and neither the Project Applicant nor the City has control over these standards. Project construction and operations would not exceed the 3,000 $MTCO_2e$ per year threshold; therefore, the Project would have a less than significant impact concerning GHG emissions.

**Table 4.8-2: Project Greenhouse Gas Emissions**

| Emissions Source | $MTCO_2e$ |
|---|---|
| Construction Amortized Over 30 Years | 22.02 |
| Area Source | 4.64 |
| Energy | 539.25 |
| Mobile | 412.64 |
| Waste | 23.91 |
| Water | 61.81 |
| Refrigeration | 0.02 |
| Emergency Backup Generator | 15.28 |
| **Total** | **1,079.57** |
| *Project Threshold* | *3,000* |
| **Exceeds Threshold?** | **No** |
| Sources: Source: CalEEMod version 2022.1. Refer to **Appendix 4.8-1** for model outputs. | |

### *4.8b Would the Project conflict with applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

**Less Than Significant Impact.**

Connect SoCal 2024 and 2020 Consistency. Development-related mobile sources are the most potent source of GHG emissions, and therefore, the Project comparison to Connect SoCal 2024 and 2020 is an appropriate indicator of whether the Project would inhibit the State's post-2020 GHG reduction goals.[29]

Compliance with applicable State standards would ensure consistency with State and regional GHG reduction planning efforts. The Connect SoCal 2024 and 2020 goals were used to determine consistency with the previously stated planning efforts. The Project's consistency with Connect SoCal 2024 and 2020 goals is analyzed in **Table 4.8-3: Connect SoCal 2024 and 2020 Consistency**. As indicated in **Table 4.8-3**, the Project would not conflict with the Connect SoCal 2024 and 2020 goals adopted to reduce GHG

[29] Connect SoCal 2024 was approved by the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) on May 10, 2024; however, it is still pending approval from CARB. Therefore, this analysis evaluates Project consistency with Connect SoCal 2024 and Connect SoCal 2020.

emissions. Therefore, the Project would not result in any significant impacts or interfere with SCAG's ability to achieve the region's GHG emissions reduction target of 19 percent by 2035.

**Table 4.8-3: Connect SoCal 2024 and 2020 Consistency**

| SCAG Goals | Compliance |
|---|---|
| **Connect SoCal 2024[1]** | |
| *Mobility: Build and maintain an integrated multimodal transportation network.* | |
| Support investments that are well-maintained and operated, coordinated, resilient and result in improved safety, improved air quality and minimized greenhouse gas emissions | **N/A.** This policy is not project-specific; therefore, it is not applicable. |
| Ensure that reliable, accessible, affordable, and appealing travel options are readily available while striving to enhance equity in the offerings in high-need communities | **N/A.** This policy is not project-specific; therefore, it is not applicable. |
| Support planning for people of all ages, abilities, and backgrounds | **N/A.** This policy is not project-specific; therefore, it is not applicable. |
| *Communities: Develop, connect, and sustain communities that are livable and thriving* | |
| Create human-centered communities in urban, suburban, and rural settings to increase mobility options and reduce travel distances | **Consistent**. The Project is in an urban area near existing employment centers and community services. Locating the Project in this area would reduce trip lengths, which would reduce air pollutants and GHG emissions. The Project is also within a short walking distance (0.1 mile) to local bus routes and is surrounded by connected sidewalks to allow for multimodal transportation. |
| Produce and preserve diverse housing types in an effort to improve affordability, accessibility, and opportunities for all households | **Consistent**. The Project proposes a housing development that would provide the community with more housing options. |
| *Environment: Create a healthy region for the people of today and tomorrow* | |
| Develop communities that are resilient and can mitigate, adapt to, and respond to chronic and acute stresses and disruptions, such as climate change | **Consistent**. The estimated Project GHG emissions do not exceed the SCAQMD's regional or localized thresholds. Based on the Friant Ranch decision, projects that do not exceed the SCAQMD's LSTs would not violate any air quality standards or contribute substantially to an existing or projected air quality violation and result in no criteria pollutant health impacts.[3] Further, the Project's emissions are below the SCAQMD's 3,000 $MTCO_2e$ screening threshold and would not contribute to a GHG/climate change impact. |

| SCAG Goals | Compliance |
|---|---|
| Integrate the region's development pattern and transportation network to improve air quality, reduce greenhouse gas emissions and enable more sustainable use of energy and water | **Consistent**. While the Project is not a transportation improvement project, the Project's location within a developed area would reduce trip lengths, which would reduce GHG and air pollutant emissions. Additionally, the reduction of energy use, improvement of air quality, and promotion of more environmentally sustainable development are encouraged through the development of alternative transportation methods, green design techniques for buildings, and other energy-reducing techniques such as compliance with the provisions of the California Building Energy Efficiency Standards and the Green Building Standards Code (CALGreen). |
| Conserve the region's resources | **Consistent**. The Project is an infill development. The Project is not located on land that is designated for agricultural uses, natural resources, or conservation. Therefore, the Project would not result in a loss of the region's resources. |
| *Economy: Support a sustainable, efficient, and productive regional economic environment that provides opportunities for all people in the region* | |
| Improve access to jobs and educational resources | **Consistent**. The Project is in an urban area near existing employment centers and community services. Locating the Project within this area would improve access to jobs and educational resources. |
| Advance a resilient and efficient goods movement system that supports the economic vitality of the region, attainment of clean air and quality of life for our communities | **N/A.** This policy is not project-specific; therefore, it is not applicable. The Project is a personal storage facility and apartment development that does not include logistics or goods movement. |
| **Connect SoCal 2020[2]** | |
| Goal 1: Encourage regional economic prosperity and global competitiveness. | **N/A.** This policy is not project-specific; therefore, it is not applicable. However, the Project is an urban infill development. Redevelopment of the site would contribute to regional economic prosperity. |
| Goal 2: Improve mobility, accessibility, reliability, and travel safety for people and goods. | **N/A.** This policy is not project-specific; therefore, it is not applicable. However, the Project is near the existing transit route SR-170. The Project is also located within a short walking distance (0.1 mile) to local bus routes and is surrounded by connected sidewalks to allow for multimodal transportation. |
| Goal 3: Enhance the preservation, security, and resilience of the regional transportation system. | **N/A.** This is not a project-specific policy; therefore, it is not applicable. |

| SCAG Goals | | Compliance |
|---|---|---|
| Goal 4: | Increase person and goods movement and travel choices within the transportation system. | **N/A.** This is not a project-specific policy; therefore, it is not applicable. |
| Goal 5: | Reduce greenhouse gas emissions and improve air quality. | **Consistent.** The Project site is in an urban area near existing transit routes and freeways. The Project's location within an urbanized area would reduce trip lengths, which would reduce GHG and air pollutant emissions. Further, the reduction of energy use, improvement of air quality, and promotion of more environmentally sustainable development are encouraged through the development of alternative transportation methods, green design techniques for buildings, and other energy-reducing techniques. The proposed Project is required to comply with the provisions of the California Building Energy Efficiency Standards and CALGreen. |
| Goal 6: | Support healthy and equitable communities | **Consistent**. The Project does not exceed State and LSTs. Based on the Friant Ranch decision, projects that do not exceed the SCAQMD's LSTs would not violate any air quality standards or contribute substantially to an existing or projected air quality violation and result in no criteria pollutant health impacts.[4] The Project would not conflict with the surrounding community's ability to access healthy food or parks. |
| Goal 7: | Adapt to a changing climate and support an integrated regional development pattern and transportation network. | **N/A.** This is not a project-specific policy; therefore, it is not applicable. |
| Goal 8: | Leverage new transportation technologies and data-driven solutions that result in more efficient travel. | **N/A.** This is not a project-specific policy; therefore, it is not applicable. |
| Goal 9: | Encourage development of diverse housing types in areas that are supported by multiple transportation options. | **Consistent.** The Project involves the development of residential housing units that will provide the community with more housing options. The Project is located within a short walking distance (0.1 mile) to local bus routes and is surrounded by connected sidewalks to allow for multimodal transportation. |
| Goal 10: | Promote conservation of natural and agricultural lands and restoration of habitats. | **N/A.** This Project is located within an urban area and is not located on agricultural lands or within a natural habitat. |

| SCAG Goals | Compliance |
|---|---|
| Sources:<br>1. Southern California Association of Governments, *Connect SoCal 2024*, 2024.<br>2. Southern California Association of Governments, *Connect SoCal 2020*, 2020.<br>3. Kimley-Horn and Associates, Inc.(2024). Phase 1 Historic Resource Assessment Report for 7528 N. Bellaire Avenue, Los Angeles, Los Angeles County, California.<br>4. See **Appendix 4.3-1** | |

2022 CARB Scoping Plan Consistency. As previously noted, the 2022 Scoping Plan sets a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions to 85 percent below 1990 levels by 2045 per AB 1279. The transportation, electricity, and industrial sectors are the State's largest GHG contributors. The 2022 Scoping Plan intends to achieve the AB 1279 targets primarily through zero-emission transportation (e.g., electrifying cars, buses, trains, and trucks). Additional GHG reductions are achieved through decarbonizing the electricity and industrial sectors.

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

As indicated in **Table 4.8-2**, approximately 93 percent of the Project's GHG emissions are from energy and mobile sources, which would be further reduced by the 2022 Scoping Plan measures described above. It is noted that the City has no control over vehicle emissions. However, these emissions would decline in the future due to the Statewide measures discussed above, as well as cleaner technology and fleet turnover. Several of the State's plans and policies would contribute to a reduction in the Project's mobile source emissions.

The Project would not obstruct or interfere with the State's progress toward carbon neutrality under the 2022 Scoping Plan. The Project would also not convert any Natural and Working Lands (NWL) and/or decrease the State's urban forest carbon stock, which are areas of emphasis in the 2022 Scoping Plan.

Building decarbonization and transitioning to non-combustion energy sources (i.e., natural gas) for new residential and non-residential buildings are also a primary focus in the 2022 Scoping Plan. As previously mentioned, the Project would be designed as all-electric and would not include natural gas conveyance to the site. The Project is in furtherance of building decarbonization and the 2022 Scoping Plan goals. Therefore, the Project would not conflict with the 2022 Scoping Plan.

### *City of Los Angeles Green New Deal*

The Green New Deal sets renewable energy procurement, water recycling, stormwater capture, building energy efficiency, and green job targets among other goals. While the Green New Deal does not make quantitative goals for individual projects, it outlines the overall sustainability goals for the City over time. The Project would comply with all applicable City regulations regarding energy and water efficiency and therefore would not conflict with the Green New Deal goals.

### *Los Angeles Green Building Code*

The Project would be subject to compliance with the L.A. Green Building Code, which includes energy and water-saving measures that reduce GHG emissions to below Title 24 requirements and promote sustainable building practices by creating a series of requirements and incentives for developers to meet these standards. The key mandatory measures for non-residential and high-rise residential buildings related to GHG emissions reduction in the L.A. Green Building Code include requirements for short- and long-term bicycle parking, parking areas for low-emitting/fuel-efficient and electric vehicles, energy-efficient appliances, and infrastructure for future electrical solar systems. The Project would be required to comply with all applicable L.A. Green Building Code standards, and therefore, would further reduce operational GHG emissions.

The Project would comply with all applicable regulations determined by the City and therefore would not conflict with any applicable plan. The Project's short-term construction and long-term operational GHG emissions would not exceed SCAQMD's 3,000 $MTCO_2e$ per year threshold. Additionally, the Project would be consistent with applicable regulations and goals. Therefore, the Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Impacts would be less than significant, and no mitigation is required.

**Mitigation Measures**

No mitigation is required.

## 4.9 Hazards and Hazardous Materials

| Environmental Issue | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **Would the Project:** | | | | |
| a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? | | | X | |
| 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? | | | X | |
| c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? | | | | X |
| d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment? | | | | X |
| 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? | | | | X |
| f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | | | X | |
| g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? | | | | X |

The discussion below regarding potential impacts on hazards and hazardous materials is based in part on the Phase I Environmental Site Assessment Report (Phase I ESA), prepared by EFI Global, dated February 2023, and the Phase II Environmental Site Assessment Report (Phase II ESA), prepared for the Project site by EEC Environmental, dated October 2023. The Phase I ESA and Phase II ESA are included in this Initial Study as **Appendix 4.9-1: Phase I Environmental Site Assessment** and **Appendix 4.9-2: Phase II Environmental Site Assessment**.

## Impact Analysis

*4.9a Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*

**Less Than Significant Impact.** Project construction would involve the transport, storage, use, and/or disposal of limited quantities of hazardous materials, such as fuels, solvents, degreasers, and paints. The use of these materials during Project construction would be short-term and would occur following standard construction practices, as well as with applicable federal, State, and local regulations. Potentially hazardous materials would be contained, stored, and used during construction following manufacturers' instructions and handled in compliance with applicable standards and regulations. Examples of such activities include fueling and servicing construction equipment, and applying paints and other coatings. Project construction would be temporary, and existing regulations of several agencies would govern these activities. Construction activities would be subject to compliance with relevant regulatory requirements and restrictions concerning the transport, use, or disposal to prevent a significant hazard to the public or the environment. The primary regulatory requirements include SCAQMD Rule 1166 (volatile organic compound emissions) and Rule 1466 (fugitive dust TACs).

The Project proposes to construct a mixed-use development (i.e., self-storage and residential uses). The Project would not emit hazardous emissions or involve hazardous or acutely hazardous materials, substances, or waste. However, the Project could involve the use of materials associated with routine maintenance of the property, such as janitorial supplies for cleaning purposes and/or herbicides and pesticides for landscaping. These uses would not involve the routine transport, use, or disposal of quantities of hazardous materials that could create a significant hazard to the public or the environment. In addition, the storage of hazardous materials would be prohibited within the individual storage units. Therefore, following compliance with the regulatory requirements, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant, and no mitigation is required.

*4.9b Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?*

**Less Than Significant Impact.** Project construction would involve the removal of existing structures, pavement, grading, site preparation, and landscaping. The Project's Phase I ESA concluded that the Project site contained recognized environmental conditions (REC) related to the former presence of automobile dismantling operations and agricultural machinery repairs on the Project site for approximately 41 years, from 1979 to at least 2020, and the potential for undocumented spills or releases of fluids associated with the dismantling operations. The Phase I ESA further identified that the Project site was historically used for agricultural purposes from the late 1920s through 1970 and that the site is located within the Los Angeles City Methane Buffer Zone.

A Phase II ESA was prepared to determine if the REC identified in the Phase I ESA (i.e., former automobile dismantling operations and agricultural machinery repairs) negatively impacted the site. The Phase II ESA determined that the soil vapor levels at one soil vapor probe (B11/SV11) at the Project site's eastern portion (where the storage facility is proposed) contained perchloroethylene (PCE) at levels above its residential screening levels. However, this probe is located within the Project site's eastern portion, away from the proposed residential uses, no structures are proposed to be placed at the location where PCE was detected, and because the proposed apartment development includes second-story apartments

constructed over open-air parking bays that would effectively break the vapor intrusion pathway and risk to the residential units, the Phase II ESA concluded the soil vapor levels are unlikely to pose risk to the proposed Project's future residents. Further, according to the *Department of Toxic Substances Control's Final Draft Supplemental Guidance: Screening and Evaluating Vapor Intrusion (Vapor Intrusion Guidance)*, the closer a building is to the subsurface contamination, the greater the potential for vapor intrusion and buildings within 100 feet of the area of impact or release area should be prioritized for vapor intrusion evaluation. The location of the detected PCE is approximately 628 feet from the proposed apartment development; thus, it is unlikely that there is a vapor intrusion risk to the proposed apartment development, and no further investigation is recommended.

As discussed above, Project operations are not anticipated to 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 Project is a mixed-use development (i.e., self-storage and residential uses). The nature of the Project would not involve the release of hazardous materials. Further, compliance with all relevant and applicable federal, State, and local laws and regulations that pertain to the transport, storage, use, and disposal of hazardous materials and waste would ensure that future development activities would not create a significant hazard to the public.

Therefore, Project construction activities and operations would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Impacts would be less than significant, and no mitigation is required.

*4.9c Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?*

**No Impact.** The school located nearest the Project site is Lowman Special Education and Career and Transition Center, which is approximately 0.2 miles to the southwest, located at 12827 Saticoy Street. The Project is a mixed-use development (i.e., self-storage and residential uses). The Project would not involve a land use that would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste. As discussed above, Project construction activities would involve the transport, storage, use, and/or disposal of limited quantities of hazardous materials, such as fuels, solvents, degreasers, and paints. However, the use of hazardous materials during construction would be subject to compliance with relevant regulatory requirements and restrictions. Similarly, Project operations would involve the use of household hazardous materials, such as cleansers, paints, fertilizers, and pesticides, for cleaning and maintenance purposes. The proposed land uses are not associated with the use, generation, storage, or transport of large quantities of hazardous or acutely hazardous materials; such uses generally include manufacturing, industrial, medical (e.g., hospital), and similar uses. Therefore, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 miles of an existing or proposed school. No impact would occur, and no mitigation is required.

*4.9d Would the Project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?*

**No Impact.** Government Code §65962.5 refers to the Hazardous Waste and Substances Site List, commonly known as the Cortese List, maintained by the State of California Department of Toxic Substances Control. The Cortese List identifies hazardous waste and substance sites, including public drinking water wells with detectable levels of contamination; sites with known underground storage tanks

having a reportable release, and solid waste disposal facilities from which there is a known migration. The Cortese List also includes hazardous substance sites selected for remedial action, historic Cortese sites, and sites with known toxic material identified through the abandoned site assessment program. Review of the EnviroStor and GeoTracker databases indicates the Project is not on a site that is included in a list of hazardous materials sites compiled under Government Code §65962.5.[30,31] Therefore, the Project would not create a significant hazard to the public or the environment in this regard. No impact would occur, and no mitigation is required.

*4.9e For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the project area?*

**No Impact.** The Project site is not located within an airport land use plan or within 2.0 miles of a public airport or public use airport. The airport located nearest the Project site is Hollywood Burbank Airport, approximately 2.2 miles to the southeast. Therefore, the Project would not result in a safety hazard or excessive noise for people residing or working in the Project area concerning airports. No impact would occur, and no mitigation is required.

*4.9f Would the Project impair implementation of or physically interfere with an emergency response plan or emergency evacuation plan?*

**Less Than Significant Impact.** The City's Emergency Operations Plan, including Appendices and Annexes, outlines interdepartmental strategies for several specific emergencies and aspects of disaster prevention, response, and recovery. While the Emergency Operations Plan does not identify specific emergency response or evacuation routes, it establishes that primary evacuation routes consist of the major interstates, highways, and primary arterials within the City and County, and state that the City will work with the Operational Area, Los Angeles County Sheriff, Law Enforcement agencies from surrounding jurisdictions, California Department of Transportation, California Highway Patrol, City and/or County Public Works, and other applicable agencies or departments to identify evacuation pick up points and transportation routes. Consistent with this approach, the City's 2021 General Plan Safety Element Update acknowledges that "jurisdictional infrastructures, such as roads and emergency services, have become increasingly interrelated," and refers to the Los Angeles County Safety Element for critical systems and evacuation routes for the entire County. Project construction would not require road closures, and emergency access to the Project site would be maintained pursuant to LAMC and Los Angeles Fire Department (LAFD) requirements. In addition, Project construction activities would not substantially impede public access or travel on public rights-of-way such as Bellaire Avenue and would not interfere with any adopted emergency response plan or emergency evacuation plan.

Project operations would not permanently alter vehicular circulation routes and patterns, nor impede public access or travel upon public rights-of-way. Furthermore, as discussed within **Section 4.17: Transportation**, the Project would not result in any significant transportation impacts. The Project would comply with LAFD access requirements and would not impede emergency access in the Project site's vicinity. Therefore, the Project would not impair the implementation of or physically interfere with an emergency response plan or emergency evacuation plan. Impacts would be less than significant, and no mitigation is required.

[30] Department of Toxic Substance Control. (2024). *Envirostor Database.* Retrieved from https://www.envirostor.dtsc.ca.gov/public/.

[31] State Water Resources Control Board. (2024). *GeoTracker*. Retrieved from https://geotracker.waterboards.ca.gov/.

### *4.9g Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?*

**No Impact.** The Project site is in a fully urbanized area, and it is not adjacent to any wildland. The Project site is also not located in a Very High Fire Severity Zone.[32] Therefore, the Project would not expose people or structures to a risk involving wildland fires. No impact would occur, and no mitigation is required.

**Mitigation Measures**

No mitigation is required.

[32] City of Los Angeles Department of City Planning. (2024). Zone Information & Map Access System. Available at: https://zimas.lacity.org/

## 4.10 Hydrology and Water Quality

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

The basis for the following information and analysis is in part the Low Impact Development (LID) Report (Omega Engineering Consultants, June 2024) and the Drainage Study (Omega Engineering Consultants, May 2024). These reports are included as **Appendix 4.10: Hydrology Studies** and summarized below.

## Impact Analysis

*4.10a Would the Project violate water quality or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?*

**Less Than Significant Impact.**

Construction. The Project's construction-related activities have the potential to degrade water quality through surface runoff exposure (primarily rainfall) to exposed soils, dust, and other debris, as well as from runoff from construction equipment. The California State Water Resources Board adopted the NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities[33] (General Permit), Order WQ 2022-0057-DWQ, on September 8, 2022, and it went into effect on September 1, 2023. Construction projects that include construction or land disturbance activities (i.e., including clearing, grading, excavation, stockpiling, and demolition activities that expose or disturb soil) that result in a disturbance of one or more acres, or less than one acre but are part of a larger common plan of development or sale that totals one or more acres of land disturbance are required to obtain coverage under the General Permit. The Project proposes demolition and construction activities throughout the entire site, with a land disturbance of approximately 3.9 acres. Therefore, the Project would be subject to the Construction General Permit. To obtain coverage under the General Permit, dischargers are required to file with the State Water Board the Permit Registration Documents, which include a Notice of Intent (NOI) and other compliance-related documents. The General Permit requires development and implementation of a stormwater pollution prevention plan (SWPPP) and monitoring plan, which must include erosion-control and sediment-control best management practices (BMPs) to control potential construction-related erosion.

Project construction would be subject to the Los Angeles Regional Water Quality Control Board Order No. R4-2012-0175-A01, NPDES No. CAS004001, effective December 28, 2012, Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles County ("Los Angeles County MS4 Permit"), which controls the quality of runoff entering municipal storm drains in Los Angeles County. Los Angeles County MS4 Permit Section VI.D.8, Development Construction Program, requires permittees, which include the City, to enforce implementation of BMPs, including, but not limited to, approval of an Erosion and Sediment Control Plan for all construction activities within their jurisdiction.[34] Erosion and Sediment Control Plans are required to include the elements of a SWPPP. Accordingly, the Project's construction contractor would be required to implement BMPs that would meet or exceed local, State, and federal mandated guidelines for stormwater treatment to control erosion and protect the quality of surface water runoff during the construction period. BMPs utilized could include, without limitation: disposing of waste in accordance with all applicable laws and regulations; cleaning up leaks, drips, and spills immediately; conducting street sweeping during construction activities; limiting the amount of soil exposed at any given time; covering trucks; keeping construction equipment in good working order; and installing sediment filters during construction activities. Therefore, following compliance with the General Permit and Los Angeles County MS4 Permit requirements, the Project's construction impacts would not violate water quality or waste

[33] California State Water Resources Control Board. (2024). *Welcome to the Construction Stormwater Program.* Retrieved from: https://www.waterboards.ca.gov/water_issues/programs/stormwater/construction.html, accessed August 7, 2024.

[34] California Regional Water Quality Control Board – Los Angeles Region, MS4 Discharges within the Coastal Watersheds of Los Angeles County Except Those Discharges Originating from the City of Long Beach MS4, Order No. R4-2012-0175, as amended by Order WQ 2015-0075, NPDES No. CAS004001, page 116.

discharge requirements or otherwise substantially degrade surface or groundwater quality. Impacts would be less than significant, and no mitigation is required.

Operations. The Los Angeles County Flood Control District, the County, and the City, along with 85 other incorporated cities within the County (Permittees), discharge pollutants from their MS4s. Stormwater and non-stormwater enter and are conveyed through the MS4 and discharged to the Los Angeles Region surface water bodies. These discharges are regulated under countywide waste discharge requirements contained in Order No. R4-2012-0175[35] (NPDES Permit No. CAS004001), *Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges Within the Coastal Watersheds of Los Angeles County, Except Discharges Originating from the City of Long Beach MS4*, which was adopted November 8, 2012.[36] The Los Angeles County MS4 Permit Order provides the revised waste discharge requirements for MS4 discharges within the Los Angeles County watersheds, which include the City of Los Angeles. Los Angeles County uses its LID Ordinance to require that projects comply with NPDES MS4 Permit water quality requirements.

The Los Angeles County MS4 Permit Order requires the development and implementation of a Planning and Land Development Program for all "New Development" and "Redevelopment" projects subject to the Order. New development and redevelopment projects/activities subject to the County's LID Ordinance include all development projects equal to 1.0 acre or greater of disturbed area and residential new or redeveloped projects that create, add, or replace 10,000 SF or greater impervious surface area. Additionally, new development subject to the MS4 Permit must comply with post-construction runoff pollution reduction BMPs implemented through the Standard Urban Stormwater Mitigation Plan (SUSMP). The Project would add more than 10,000 SF of impervious surface area; as such, the Project is subject to Los Angeles County's LID Ordinance and would require a SUSMP. The Project would include parking lots, pedestrians, driveways, building rooftops, landscaped areas, lawns, and vehicular traffic/activities, which could contribute pollutants to stormwater runoff. The City would assign the Project's SUSMP conditions, which would consist of LID BMPs, source control BMPs, and structural and nonstructural BMPs for specific types of uses. LID controls would be used to effectively reduce the amount of the site's impervious area and promote the use of infiltration and other controls that reduce runoff. Source control BMPs would be used to prevent runoff contact with pollutant materials that would otherwise be discharged to the MS4. Specific structural controls would also be required to address pollutant discharges from certain uses, including housing developments, parking lots, and new streets, among others. Therefore, following compliance with NPDES requirements (i.e., Los Angeles County's LID Ordinance), which include various types of BMPs, Project operations would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. Impacts would be less than significant, and no mitigation is required.

### *4.10b Would the Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge, such that the project may impede sustainable groundwater management of the basin?*

**Less Than Significant Impact.**

Groundwater Supplies. The Project site is located in the LADWP service area. LADWP receives water from several sources, including the Los Angeles Aqueduct, the Metropolitan Water District of Southern

[35] California State Water Quality Control Board. *Order No. R4-2012-0175 NPDES Permit No. CAS004001*.
[36] California State Water Quality Control Board. *Order No. R4-2012-0175 NPDES Permit No. CAS004001*.

California, local groundwater, and recycled water.[37] As required by the Urban Water Management Planning Act, LADWP has coordinated with nearby agencies while developing its Urban Water Management Plan (UWMP) to ensure consistency with other related planning efforts, such as Groundwater Sustainability Plans (GSP).

The City primarily recharges and extracts local groundwater from the Upper Los Angeles River Area watershed, which includes the San Fernando Basin and Sylmar Basin. The City also owns and extracts its local groundwater rights from the Central Basin and is entitled to produce water from the neighboring West Coast Basin. The unadjudicated Hollywood, Santa Monica, and northern Central Basins are local groundwater resources that do not currently provide groundwater to the City, but there is potential to develop future drinking water supplies for the City from these groundwater basins. In total, the City's groundwater rights can potentially supply more than 110,000 acre-feet per year (AFY) of groundwater. The San Fernando Basin has an available storage capacity of 500,000 acre-feet (AF), and the West Coast and Central Basins have a combined available storage capacity of 500,000 AF. In the San Fernando Basin, imported and recycled water recharged into the basin can be stored and pumped to meet future demands.

Because the Project site's existing General Plan land use designation is Commercial Manufacturing, Parking Buffer, and Low Residential, this is what was assumed in the UWMP for the Project site. The Project proposes a mixed-use (commercial and residential) development comprised of two buildings with a total gross building area of approximately 229,807 SF, with approximately 217,827 SF of commercial (self-storage space) (1,584 units) and approximately 11,980 SF of residential space (eight DU), which is not consistent with the Parking Buffer and Low Residential designations. To implement the mixed-use development, the Project proposes a General Plan Amendment to change the site's Parking Buffer and Low Residential land use designations to Commercial Manufacturing. As concluded in Response 4.19b, the Project's anticipated water demand is 10.48 AFY, which could be greater than the UWMP's underlying development assumptions (based on the existing General Plan). However, because the San Fernando Basin and Sylmar Basin are adjudicated, and the LADWP would continue to collaborate to avoid overdraft and ensure the allowed pumping allocations are available to the pumpers, and because the Project would be subject to the applicable State and local regulations concerning water conservation, the Project would not substantially deplete groundwater supplies such that it would impede sustainable groundwater management of the basin.

Groundwater Recharge. Basin recharge occurs through percolation of precipitation and artificial recharge activities at spreading grounds, among other sources. The Project site does not involve spreading grounds. The existing Project site is 2.7 percent impervious. Upon Project buildout, the Project site would be approximately 86.5 percent impervious.[38] The Project would increase the on-site impervious area, resulting in less on-site percolation of precipitation. However, LADWP's Groundwater Management Program is focused on gradually increasing its capital investments, primarily focusing on projects that increase groundwater recharge and well production as well as improve groundwater in the San Fernando Basin. The Project would not interfere with any of the LADWP Groundwater Management Program's projects related to increasing groundwater recharge. Therefore, the Project would not interfere substantially with groundwater recharge such that it would impede sustainable groundwater management of a basin. Impacts would be less than significant, and no mitigation is required.

[37] Los Angeles Department of Water and Power. (2020). Urban Water Management Plan 2020. Available at: www.ladwp.com/UWMP

[38] Omega Engineering Consultants. (2024). *Drainage Study – Trojan Storage of North Hollywood.* Page 4.

*4.10c Would the Project substantially alter the existing drainage pattern of the site or area, including through the alterations of the course of stream or river or through the addition of impervious surfaces, in a manner which would:*

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

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

**Less Than Significant Impact.** No stream or river traverses the Project site or its vicinity. Under existing conditions, the Project site is vacant/unimproved except for one single-family residential dwelling on the site's southwest corner. As concluded in Response 4.7b, Project operations would not result in substantial erosion of General Permit and Los Angeles County MS4 Permit requirements. While the Project's proposed drainage conditions are designed to mimic the existing onsite drainage conditions to the maximum extent possible, the Project proposes a new mixed-use development on a mostly vacant site, which would increase the site's impervious surfaces and alter the onsite/ drainage patterns. However, the Project would be required to implement an LID Plan during Project operations that would reduce the amount of surface water runoff leaving the Project site after a storm event. Specifically, the LID Plan would require the implementation of stormwater BMPs to retain or treat the runoff from a storm event producing 0.75 inches of rainfall in 24 hours. The Project proposes a new engineered stormwater drainage system that would feature structural BMPs (i.e., infiltration facility), which would retain onsite flows. The Project's proposed storm drainage system is designed pursuant to applicable federal, State, and local requirements concerning drainage, hydrology, and water quality. Additionally, the Project's BMPs would be designed to reduce potential erosion and siltation. Therefore, the Project would not substantially alter the existing drainage pattern of the site or area, including through the addition of impervious surfaces, in a manner that would result in substantial erosion or siltation on- or off-site, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Impacts would be less than significant, and no mitigation is required.

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

**Less Than Significant Impact.** See Response 4.10c above concerning the Project's potential to create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems. See Response 4.10a above concerning the Project's potential to provide substantial additional sources of polluted runoff. Impacts would be less than significant, and no mitigation is required.

*(iv) Impede or redirect flood flows?*

**Less Than Significant Impact.** See Response 4.10c above concerning the Project's potential to create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems. Additionally, the Project site is not within a Special Flood Hazard Area (SFHA). Flood hazard areas identified on the Flood Insurance Rate Map are designated as SFHA, defined as the area that will be inundated by a flood event with a 1-percent chance of being equaled or exceeded in any given year. The 1-percent annual chance flood is also referred to as the base flood or 100-year flood. Flood Insurance Rate Map 06037C1310F indicates the Project is within Zone X, 0.2 percent chance of flood; areas with a one percent annual chance of flood with average depths of less than one foot or with drainage areas less than

one square mile; or areas protected by levees from the one percent annual chance of flood.[39] Therefore, the Project would not alter the existing drainage pattern of the site or area, including through the addition of impervious surfaces, in a manner that would impede or redirect flood flows. A less-than-significant impact would occur, and no mitigation is required.

### *4.10d Would the Project, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation?*

**No Impact.** The Project site is not within an SFHA (see Response 4.10c(iv) above), nor is it within a tsunami or seiche zone[40] Therefore, the Project site would not be subject to inundation from such events. No impact would occur, and no mitigation is required. See Response 4.10a above concerning the Project's potential to provide substantial sources of polluted runoff.

### *4.10e Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

**Less Than Significant Impact.** Water quality control plans applicable to the project include the LARWQB Water Quality Control Plan, the Los Angeles Region: Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties, and the City's Water Quality Compliance Master Plan for Urban Runoff. Refer to Responses 4.10a and 4.10b. The Project would comply with regional and local regulations requiring the preparation of a SWPPP and would not obstruct existing water quality control plans or groundwater sustainable management plans. In addition, the Project would be required to comply with a Project-specific water quality management plan during operations. Therefore, the Project would not conflict with or obstruct the implementation of a water quality control plan or sustainable groundwater management plan. Impacts would be less than significant, and no mitigation is required.

**Mitigation Measures**

No mitigation is required.

[39] United States Federal Emergency Management Agency. (2024). Flood Insurance Rate Map 06037C1310F. Available at: https://msc.fema.gov

[40] City of Los Angeles Department of City Planning. (2024). Zone Information & Map Access System. Available at: https://zimas.lacity.org/

## 4.11 Land Use Planning

| Environmental Issue | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **Would the Project:** | | | | |
| a) Physically divide an established community? | | | | X |
| 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? | | | X | |

### Impact Analysis

*4.11a Would the Project physically divide an established community?*

**No Impact.** Examples of projects that could physically divide an established community include a new freeway or highway that traverses an established neighborhood. The Project proposes residential and commercial infill development. The Project would replace an existing unoccupied single-family residential dwelling and does not propose any new roadways or other physical barriers. Given its nature and scope, the Project would not physically divide an established community. No impact would occur, and no mitigation is required.

*4.11b Would the Project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?*

**Less Than Significant Impact.**

City of Los Angeles General Plan. The General Plan, originally adopted in 1974, sets forth goals, objectives, policies, and programs, to provide an official guide to the future development of the City, while integrating a range of state-mandated elements, including Land Use, Circulation (Mobility Plan 2035), Housing, Conservation, Open Space, Safety, Noise, and Air Quality. The General Plan also includes the Framework Element, the Health and Wellness Element (Plan for a Healthy Los Angeles), the Infrastructure Systems Element, and the Public Facilities & Services Element. Both the General Plan land use controls and the goals, objectives, and policies within individual elements of the General Plan include numerous provisions that are intended to avoid or reduce potential adverse effects on the environment. The elements that make up the General Plan are described in more detail below.

General Plan Framework Element. The General Plan Framework Element sets forth a citywide comprehensive long-range growth strategy and establishes citywide policies regarding land use, housing, urban form, neighborhood design, open space and conservation, economic development, transportation, infrastructure, and public services. The General Plan Framework Element provides guidelines for future updates of the City's community plans, but does not supersede the more detailed community and specific plans.

*Land Use Chapter*

The General Plan Framework Element's Land Use Chapter provides objectives to support the viability of the City's residential neighborhoods and commercial and industrial districts and to encourage sustainable growth. The Land Use Chapter establishes the following land use categories, which are described in terms of intensity/density ranges, development heights, and lists of typical land uses: Single-Family Residential, Multifamily Residential, Neighborhood Districts, Community Centers, Regional Centers, Downtown Center, General Commercial Areas, Mixed-Use Boulevards, Industrial Districts, Transit Stations, Pedestrian-Oriented Districts, and Historic Districts. These land use categories are intended to serve as guidelines for the Community Plans and do not convey land use entitlements or affect existing zoning for properties in the City.

The Project site is located in the southwestern portion of the Sun Valley – La Tuna Canyon Community Plan ("Community Plan"). The Project site's existing land use designations are listed in **Table 2.2-1** and depicted on **Exhibit 2-3: Existing General Plan Land Use Map**. As indicated, most of the Project site is designated Commercial Manufacturing, with the remainder designated Parking Buffer and Low Residential.

The Project proposes a mixed-use (commercial and residential) development comprised of two buildings with a total gross building area of approximately 229,807 SF, with approximately 217,135 SF of commercial (self-storage space) (up to 1,584 units) and approximately 11,980 SF of residential space (eight DU), which is not consistent with the Parking Buffer and Low Residential designations. Therefore, the Project seeks approval of a General Plan Amendment to change the existing General Plan land use designations on 1.3 acres from Low Residential and Parking Buffer to Commercial Manufacturing to allow for the proposed self-storage and residential uses. Following approval of the requested General Plan Amendment, no conflict with the General Plan Land Use Plan would occur.

*Housing Chapter*

The overarching goal of the General Plan Framework Element's Housing Chapter is to define the distribution of housing opportunities by type and cost for all residents of the City.

*Urban Form and Neighborhood Design Chapter*

The General Plan Framework Element's Urban Form and Neighborhood Design Chapter establishes a goal of creating a livable City for existing and future residents. This chapter defines "urban form" as the City's general pattern of building height, development intensity, activity centers, focal elements, and structural elements, such as natural features, transportation corridors, open space, and public facilities. "Neighborhood design" is defined as the physical character of neighborhoods and communities. The Urban Form and Neighborhood Design Chapter of the Framework Element encourages growth in areas that have a sufficient base of both commercial and residential development to support transit service.

*Open Space and Conservation Chapter*

The General Plan Framework Element's Open Space and Conservation Chapter contains goals, objectives, and policies to guide the provision, management, and conservation of public open space resources; address the outdoor recreational needs of the City's residents; and guide amendments to the General Plan Open Space Element and Conservation Element.

*Economic Development Chapter*

The General Plan Framework Element's Economic Development Chapter seeks to identify physical locations necessary to attract continued economic development and investment to targeted districts and centers. Goals, objectives, and policies include retaining commercial uses, particularly within walking distance of residential areas, promoting business opportunities in areas where growth can be accommodated without encroaching on residential neighborhoods, and retaining industrial land uses on appropriate sites.

*Transportation Chapter*

The goals of the General Plan Framework Element's Transportation Chapter are to provide adequate accessibility to commerce, work opportunities, and essential services, and to maintain acceptable levels of mobility for all those who live, work, travel, or move goods in the City. The Transportation Chapter includes proposals for major transportation improvements to enhance the movement of goods and to provide greater access to major intermodal facilities, such as ports and airports. The goals, objectives, policies, and related implementation programs of the Transportation Chapter are outlined in the Transportation Element of the General Plan adopted by the City in September 1999. The City Council initially adopted Mobility Plan 2035 in August 2015 as an update to the Transportation Element of the General Plan. Mobility Plan 2035 was readopted in January 2016 and again in September 2016. Accordingly, the Transportation Chapter of the Framework Element is now implemented through Mobility Plan 2035.

*Infrastructure and Public Services Chapter*

The General Plan Framework Element's Infrastructure and Public Services Chapter addresses infrastructure and public service systems, including wastewater, stormwater, water supply, solid waste, police, fire, libraries, parks, power, schools, telecommunications, street lighting, and urban forest. For each of the public services and infrastructure systems, basic policies call for monitoring service demands and forecasting the future need for improvements, maintaining an adequate system/service to support the needs of the population and employment growth, and implementing techniques that reduce demands on utility infrastructure or services. Generally, these techniques encompass a variety of conservation programs (e.g., reduced use of natural resources, increased site permeability, watershed management, and others). Attention is also placed on the establishment of procedures for the maintenance and/or restoration of service after emergencies, including earthquakes.

An analysis of the Project's consistency with the relevant General Plan Framework Element's goals, objectives, and policies is provided in **Table 4.11-1: General Plan Framework Element Consistency.**

**Table 4.11-1: General Plan Framework Element Consistency**

| Objective/Policy | Project Analysis |
|---|---|
| **Chapter 3: Land Use** | |
| **Objective 3.1:** Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors. | **No Conflict.** The Project proposes a mixed-use (commercial and residential) development within an urban area to assist in meeting local demand for self-storage space and housing. The development of a self-storage facility at the Project site would provide residents and businesses with additional space to store inventory |

| Objective/Policy | Project Analysis |
|---|---|
| | and equipment, which may improve operations and efficiency. Additionally, the availability of storage units may help reduce clutter and improve the overall appearance of the Project area, which could encourage visitors to the area. Therefore, the Project would not conflict with this objective. |
| **Policy 3.1.2:** Allow for the provision of sufficient public infrastructure and services to support the projected needs of the City's population and businesses within the patterns of use established in the community plans as guided by the Framework Citywide Long-Rang Land Use Diagram. | **No Conflict.** As discussed in **Section 4.6: Energy**, **Section 4.15: Public Services**, and **Section 4.19: Utilities and Service Systems**, the agencies that provide public infrastructure, services, and utilities to the Project site would have the capacity to serve the Project. Therefore, the Project would not conflict with this policy. |
| **Objective 3.2:** Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and air pollution. | **No Conflict.** The Project proposes a mixed-use (commercial and residential) development. The Project's self-storage facility would allow for the storage of household goods near a large and increasing number of residential uses, including the proposed eight DU. The Project is served by LA Metro Line 169 and would provide bicycle parking for employees, residents, and visitors. Therefore, the Project would provide opportunities for the use of alternative modes of transportation, including convenient access to public transit and opportunities for walking and biking, thereby promoting an improved quality of life and facilitating a reduction in vehicle trips, VMT, and air pollution. Therefore, the Project would not conflict with this policy. |
| **Policy 3.2.3:** Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations. | **No Conflict.** The Project would provide opportunities for employees, residents, and visitors to use public transit on work trips and walk to commercial businesses near the Project site. In addition, the Project would provide short- and long-term bicycle parking as required by the City Bicycle Ordinance. The Project would provide 58 bicycle parking spaces on site. Therefore, the Project would not conflict with this policy. |
| **Policy 3.2.4:** Provide for the siting and design of new development that maintains the prevailing scale and character of the City's stable residential neighborhoods and enhance the character of commercial and industrial districts. | **No Conflict.** The Project proposes to construct a 40-foot-tall commercial building and a 27-foot, 4-inch residential building, which would be consistent with the prevailing scale and character of the surrounding residential and industrial uses. It would also enhance the surrounding residential area by facilitating the development of a vacant and aging single-family residential DU on an overgrown lot with a newly constructed mixed-use facility. Therefore, the Project would not conflict with this policy. |

| Objective/Policy | Project Analysis |
|---|---|
| **Objective 3.3:** Accommodate projected population and employment growth within the City and each community plan area and plan for the provision of adequate supporting transportation and utility infrastructure and public services. | **No Conflict.** As detailed in **Section 4.14: Population and Housing**, the Project's population growth would be nominal, approximately 21 persons in total, and approximately 11 persons over existing General Plan land use assumptions. Therefore, the Project would not result in inadequate provision of transportation and utility infrastructure and public services in the area. As discussed in **Section 4.15: Public Services**, the Project would not require the addition of a new fire, police, school, or library facility, nor the expansion of an existing facility to maintain service. As discussed in **Section 4.19: Utilities and Service Systems**, the existing utility infrastructure can accommodate the Project. Public services and utility providers would have the capacity to adequately provide supporting public services and utility infrastructure to serve the Project. Therefore, the Project would not conflict with this objective. |
| **Objective 3.4:** Encourage new multi-family residential, retail commercial, and office development in the City's neighborhood districts, community, regional, and downtown centers as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts. | **No Conflict.** The Project proposes a mixed-use development with approximately 229,807 SF of commercial floor area and eight DU within the Sun Valley – La Tuna Canyon Community Plan area. Therefore, the Project would not conflict with this objective. |
| **Chapter 4: Housing** | |
| **Policy 4.1.1:** Provide sufficient land use and density to accommodate an adequate supply of housing units by type and cost within each City subregion to meet the twenty-year projections of housing needs. | **No Conflict.** The Project would develop eight one-bedroom DU, in the Sun Valley – La Tuna Canyon Community Plan area, which would help meet the anticipated growth in housing demand for the area and the City. Therefore, the Project would not conflict with this policy. |
| **Chapter 5: Urban Form and Neighborhood Design** | |
| **Objective 5.5:** Enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm. | **No Conflict.** As shown on **Exhibit 2-2**, the Project site is vacant/unimproved except for one unoccupied single-family residential DU (circa 1938, approximately 924 SF and various accessory structures/sheds (year of construction unknown, approximately 900 SF). The Project would redevelop the site with two new buildings, 3,045 SF of common open space, and landscaping. Therefore, the Project would enhance the livability of the surrounding neighborhood by transforming a vacant lot with dilapidated structures into a new mixed-use development that offers services to the public. The Project would not conflict with this policy. |

| Objective/Policy | Project Analysis |
|---|---|
| **Objective 5.9:** Encourage proper design and effective use of the built environment to help increase personal safety at all times of the day. | **No Conflict.** The Project proposes a new mixed-use development with eight residential DU and approximately 217,827 SF of commercial floor area. This mix of uses would promote additional activity and natural surveillance after commercial business hours. The Project would also include enhanced sidewalk paving and landscaping adjacent to the Project site, which would further activate the pedestrian environment. Lighting of building entries and walkways would provide for security and pedestrian orientation and allow clear identification of secure routes between parking areas and points of entry into the building. The Project would provide lighting of parking areas, elevators, and walkways to maximize visibility and reduce areas of concealment, pursuant to LAMC requirements. Overall, the Project would facilitate observation and natural surveillance, as well as increased personal safety at all times of the day. Therefore, the Project would not conflict with this objective or policies. |
| **Policy 5.9.1:** Facilitate observation and natural surveillance through improved development standards which provide for common areas, adequate lighting, clear definition of outdoor spaces, attractive fencing, use of landscaping as a natural barrier, secure storage areas, good visual connections between residential, commercial, or public environments and grouping activity functions such as childcare or recreation areas. | |
| **Policy 5.9.2:** Encourage mixed-use development which provides for activity and natural surveillance after commercial business hours through the development of ground floor retail uses and sidewalk cafes. Mixed-use should also be enhanced by locating community facilities such as libraries, cultural facilities, or police substations, on the ground floor of such building, where feasible. | |
| **Chapter 7: Economic Development** | |
| **Objective 7.2:** Establish a balance of land uses that provides for commercial and industrial development which meets the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality. | **No Conflict.** The Project would support this objective by providing a self-storage facility that would serve the needs of local residents, including those residing in the proposed onsite eight DU. In addition, the Project would have convenient access to public transit and opportunities for walking and biking, thereby facilitating a reduction in vehicle trips, VMT, and air pollution to ensure maximum feasible environmental quality. Furthermore, the Project would integrate sustainable and green building techniques by complying with the latest Title 24 LAMC, CALGreen Building Code, and L.A. Green Building Code energy efficiency requirements. Therefore, the Project would not conflict with this objective. |
| **Policy 7.2.3:** Encourage new commercial development in proximity to rail and bus transit corridors and stations. | **No Conflict.** The Project would be located near public transit, including LA Metro Line 169. The Project would also include short- and long-term bicycle parking. Therefore, the Project would provide new commercial |

| Objective/Policy | Project Analysis |
|---|---|
| | development in proximity to the bus station and would not conflict with this policy. |
| **Chapter 9: Infrastructure and Public Services** | |
| **Policy 9.3.1:** Reduce the amount of hazardous substances and the total amount of flow entering the wastewater system. | **No Conflict.** As discussed in **Section 4.10: Hydrology and Water Quality**, during construction, the Project would be required to obtain coverage under the General Permit. Following General Permit requirements, the Project would be required to implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows and prevent pollution. In addition, in accordance with NPDES Municipal Permit requirements, the Project would be required to implement the SUSMP and LID requirements throughout the operational life of the Project. The SUSMP would outline stormwater treatment measures or post-construction BMPs required to control pollutants of concern. In addition, consistent with the City's LID requirement to reduce the quantity and improve the quality of rainfall runoff that leaves the Project site, the Project would include the installation of an infiltration system as established by the LID Manual. Therefore, the Project would not conflict with this policy. |
| **Objective 9.6:** Pursue effective and efficient approaches to reducing stormwater runoff and protecting water quality. | **No Conflict.** See the consistency analysis for Policy 9.3.1 above. |
| **Policy 9.9.7:** Incorporate water conservation practices in the design of new projects so as not to impede the City's ability to supply water to its other users or overdraft its groundwater basins. | **No Conflict.** The Project would incorporate water conservation features, such as high-efficiency Energy Star appliances, drip/surface irrigation, proper hydro-zoning/zoned irrigation, and drought-tolerant plants, which would minimize water use. Therefore, the Project would not conflict with this policy. |
| **Objective 9.10:** Ensure the water supply, storage, and delivery systems are adequate to support planned development. | **No Conflict.** As evaluated in **Section 4.19**, the Project would be within the LADWP's current and projected available water supplies for normal, single-dry, and multiple-dry years. As such, the LADWP would be able to meet the Project's water demand, as well as the existing and planned future water demands of its service area. Further, the Project would not exceed the available capacity within the distribution infrastructure that would serve the Project site. Therefore, the Project would not conflict with this policy. |

Source: City of Los Angeles. 1996. *The Citywide General Plan Framework: An Element of the City of Los Angeles General Plan*, Updated 2001. https://planning.lacity.gov/plans-policies/framework-element. Accessed April 2024.

Mobility Element 2035. The Transportation Element (Mobility Plan), adopted on January 20, 2016, and readopted on September 7, 2016, is a comprehensive update of the General Plan Transportation Element.

The Mobility Plan 2035 provides the policy foundation for achieving a transportation system that balances the needs of all road users, incorporates "complete streets" principles, and lays the policy foundation for how future generations of Angelenos interact with their streets, in compliance with the Complete Streets Act (AB 1358).

The purpose of the Mobility Plan is to present a guide to the future development of a citywide transportation system for the efficient movement of people and goods. While the Mobility Plan focuses on the City's transportation network, it complements other components of the General Plan that pertain to the arrangement of land uses to reduce VMT and policies to support the provision and use of alternative transportation modalities. The Mobility plan includes the following five main goals that define the City's high-level mobility priorities.

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

An analysis of the Project's consistency with the relevant Mobility Plan goals, objectives, and policies is provided in **Table 4.11-2: Mobility Plan 2035 Consistency.**

**Table 4.11-2: Mobility Plan 2035 Consistency**

| Objective/Policy | Project Analysis |
|---|---|
| **Chapter 2: World Class Infrastructure** | |
| **Policy 2.6:** Provide safe, convenient, and comfortable local and regional bicycling facilities for people of all types and abilities. | **No Conflict.** The Project would not modify existing bicycle facilities. The Project would enhance bicycle facilities onsite by providing short-term and long-term bicycle spaces in conformance with the City's Bicycle Ordinance. Therefore, the Project would not conflict with this policy. |
| **Chapter 3: Access for All Angelenos** | |
| **Policy 3.1:** Recognize all modes of travel including pedestrian, bicycle, transit, and vehicular modes – including goods movement – as integral components of the City's transportation system. | **No Conflict.** Given the Project site's location near various transportation options and the infill nature of the Project, the Project would maximize the potential for mobility and accessibility. The Project would promote the use of bicycles by providing access to short-term and long-term bicycle parking spaces on the site. Therefore, the Project would not conflict with this policy. |

| Objective/Policy | Project Analysis |
|---|---|
| **Policy 3.3:** Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services. | **No Conflict.** The Project would provide a mixed-use development in an urbanized area well-served by transit, and within walking distance to commercial uses. The proposed residential and commercial uses would support the Project area's existing range of services and activities. Therefore, the Project would not conflict with this policy. |
| **Policy 3.4:** Provide all residents, workers, visitors, with affordable, efficient, convenient, and attractive transit services. | **No Conflict.** The Project site is located in an area well-served by public transit, including LA Metro Line 169. Therefore, the Project would not conflict with this policy. |
| **Policy 3.8:** Provide bicyclists with convenient, secure and well-maintained bicycle parking facilities. | **No Conflict.** The Project would provide 58 bicycle parking spaces onsite per LAMC requirements. Therefore, the Project would not conflict with this policy. |
| **Chapter 5: Clean Environments & Healthy Communities** | |
| **Policy 5.2:** Support ways to reduce vehicle miles traveled (VMT) per capita. | **No Conflict.** The Project supports reductions in VMT by providing a mixed-use development within walking distance of LA Metro Line 169, as well as numerous retail, dining, and employment opportunities, and thus, provides opportunities for residents and employees to use transportation alternatives to single-occupancy vehicles. In addition, the Project's provision of short- and long-term bicycle parking spaces facilitates travel to and from the Project for bicyclists. |
| Source: City of Los Angeles. (2017). *Mobility Plan 2035.* Retrieved from: https://planning.lacity.gov/odocument/523f2a95-9d72-41d7-aba5-1972f84c1d36/Mobility_Plan_2035.pdf. Accessed May 2024. | |

Plan For A Healthy Los Angeles. The Plan for a Healthy Los Angeles (Healthy LA Plan) is the new General Plan Health and Wellness Element. The Healthy LA Plan identifies seven primary goals and associated objectives, policies, and possible programs that serve as the implementation blueprint for creating healthier, vibrant communities. An analysis of the Project's consistency with the relevant Healthy LA Plan goals, objectives, and policies is provided in **Table 4.11-3: Healthy LA Plan Consistency.**

**Table 4.11-3: Healthy LA Plan Consistency**

| Objective/Policy | Project Analysis |
|---|---|
| **Chapter 2: A City Built for Health** | |
| **Policy 2.2 Healthy Building Design and Construction:** Promote a healthy built environment by encouraging the design and rehabilitation of buildings and sites for healthy living and working conditions, including promoting enhanced pedestrian-oriented circulation, lighting, attractive open stairs, healthy building materials and | **No Conflict.** The Project would replace a vacant lot and dilapidated single-family residential building with a mixed-use development that includes pedestrian and bicycle facilities and is near commercial and retail uses, and transit. The Project would include 8,000 SF of open space for the proposed residents. The Project would also incorporate security features to enhance safety and would comply with the Americans with Disabilities Act |

| Objective/Policy | Project Analysis |
|---|---|
| universal accessibility using existing tools, practices, and programs. | (ADA) standards. Therefore, the Project would promote a healthy built environment by rehabilitating the Project site for healthy living and working conditions and would not conflict with this policy. |
| **Chapter 5: An Environment Where Life Thrives** | |
| **Policy 5.7 Land Use Planning For Public Health and GHG Emission Reduction:** Promote land use policies that reduce per capita greenhouse gas emissions, result in improved air quality and decreased air pollution, especially for children, seniors, and others susceptible to respiratory diseases. | **No Conflict.** In addition to adhering to smart growth principles of locating new development in infill locations adjacent to existing employment centers and public transportation options, the Project would incorporate a range of building technologies and energy-efficient design features, such as high-efficiency toilets, low-flow showerheads and faucets, drought-tolerant landscaping, and irrigation controls to reduce water consumption. The Project's energy efficiency features and location near transit facilities could help reduce its energy and vehicle emission footprint and thus the per capita GHG emissions of its employees, residents, and visitors. Therefore, the Project would not conflict with this policy. |
| Source: City of Los Angeles. (2015). *Plan for a Healthy Los Angeles.* Retrieved from: https://planning.lacity.gov/plan-healthy-los-angeles. Accessed May 2024. | |

Sun Valley-La Tuna Canyon Community Plan Policies. The City's community plans are intended to promote an arrangement of land uses, streets, and services, which would encourage and contribute to the economic, social, and physical health, safety, and welfare of the people who live and work in the community. The community plans are also intended to guide development to create a healthy and pleasing environment. The community plans coordinate development among the various communities of the City and adjacent municipalities in a fashion both beneficial and desirable to the residents of the community.

The Sun Valley-La Tuna Canyon Community Plan guides land uses on the Project site and in the surrounding areas within the Sun Valley-La Tuna Canyon Community Plan Area. An analysis of the Project's consistency with the relevant Community Plan objectives and policies is provided in **Table 4.11-4: Sun Valley-La Tuna Canyon Community Plan Consistency**.

**Table 4.11-4: Sun Valley-La Tuna Canyon Community Plan Consistency**

| Policy | Project Analysis |
|---|---|
| **Chapter III: Land Use Policies and Programs** | |
| **Objective 1-1:** To provide for the preservation of existing housing and for the development of new housing to meet the diverse economic and physical needs of the existing residents and projected populations of the Plan area to the year 2010. | **No Conflict.** The Applicant proposes a mixed-use (commercial and residential) development, with approximately 217,827 SF of commercial (self-storage floor area, up to 1,584 units) and eight DU. Therefore, the Project would provide new housing to help meet the needs of the City's projected population and would not conflict with this objective. |

| Policy | Project Analysis |
|---|---|
| **Policy 1-1.3:** Require that new single and multi-family residential development be designed in accordance with the Urban Design Chapter. | **No Conflict.** The Project would be generally developed following the community design and landscaping standards outlined in the Urban Design Chapter. Similar to the standards included in the Urban Design Chapter, the Project includes entryway improvements, trees, and open space. Therefore, the Project would not conflict with this policy. |
| **Policy 1-3.2:** Seek a high degree of architectural compatibility and landscaping for new infill development to protect the character and scale of existing residential neighborhoods. | **No Conflict.** The Project proposes residential and commercial infill development that would be consistent with the City's Citywide Design Guidelines. Additionally, the Project would provide 25,365 SF of landscaping pursuant to LAMC requirements. Therefore, the Project would not conflict with this policy. |
| **Policy 2-1.2:** Require that projects be design and developed to achieve a high level of quality, distinctive character, and compatibility with existing uses and developed in accordance with design standards. | |
| **Policy 2-2.1:** Improve security and parking standards in commercial areas. | **No Conflict.** The Project would improve the security of the existing Project site by constructing the proposed mixed-use development that would have security lighting. Additionally, on-site surface parking for future employees, visitors, and residents would be provided. Therefore, the Project would not conflict with this policy. |
| **Policy 2-2.2:** Require that mixed-use projects be designed with commercial uses on the ground floor and developed to achieve a high level of quality, distinctive character, and compatibility with existing uses. Alternately, mixed-use can take the form of a contiguous, horizontal mixed-use development, where exclusively residential, office or commercial buildings are located side-by-side in a block, achieving a mix of uses, but not a single vertical building. | **No Conflict.** The Applicant proposes a contiguous horizontal mixed-use (commercial and residential) development, with approximately 217,827 SF of commercial floor area (self-storage facility, 1,584 units) and eight DU. Therefore, the Project would not conflict with this policy. |
| **Policy 2-3.1:** Improve the landscaping of commercial properties. | **No Conflict.** Project implementation would improve the site's landscaping as the property is currently mostly vacant and dilapidated. As shown in **Exhibit 2-8: Preliminary Landscape Plan**, the Project proposes landscaping pursuant to LAMC requirements, including along the Project site's perimeter. Therefore, the Project would not conflict with this policy. |
| **Policy 8-1.1:** Consult with the Police Department as part of the review of new development projects and proposed land use | **No Conflict.** As discussed in **Section 4.15: Public Services**, as part of the development review process, LAPD would review the Project concerning emergency access and |

| Policy | Project Analysis |
|---|---|
| changes to determine law enforcement needs and demands. | site/facility security requirements and recommendations. LAPD would review Project plans to ensure compliance with applicable City regulations, to ensure adequate site signage, lighting, and other crime safety preventative measures are implemented. Therefore, the Project would not conflict with this policy. |
| **Policy 8-2.2:** Ensure adequate lighting around residential, commercial, and industrial buildings in order to improve security. | |
| **Objective 9-1:** To ensure that fire facilities and protective services are sufficient for the existing and future population and land uses. | **No Conflict.** As concluded in **Section 4.15**, as part of the development review process, LAFD Fire Development Services would review the proposed Project site plan and determine if access and water system requirements, which would enhance the proposed development's fire protection, are adequate. Further, the Project would be required to comply with standard LAFD conditions of approval. Specifically, the LAFD review addresses fire and life safety requirements for project construction at the fire plan check stage. This includes a plan review of the design details of the architectural, structural, mechanical, plumbing, and electrical systems. The Project would be required to comply with applicable City, County, and State code requirements for fire protection. LAMC Article 7, *Fire Protection and Prevention (Fire Code)*, adopts the Los Angeles Fire Code and portions of the 2022 California Fire Code and 2021 International Fire Code. Implementation of all Fire Code requirements would further reduce potential impacts concerning fire protection services. Therefore, the Project would not require the need for new or physically altered fire station facilities to maintain acceptable service ratios, response times, or other performance objectives and would not conflict with this objective/policy. |
| **Policy 9-1.1:** Coordinate with the Fire Department as part of the review of significant development projects and General Plan Amendments affecting land use to determine the impact on service demands. | |
| Source: City of Los Angeles. 1999. *Sun Valley-La Tuna Canyon Community Plan Update*, Updated 2016. https://planning.lacity.gov/plans-policies/community-plan-area/sun-valley-la-tuna-canyon. Accessed April 2024. | |

Zoning. The Project site's existing zoning is presented in **Table 2.2-2** and depicted on **Exhibit 2-4: Existing Zoning Map**. As indicated, most of the Project site is zoned "RA" Suburban Zone (RA-1), with only smaller portions zoned "Tentative R1" One-Family Zone ([T]RA-1) and "R2" Two-Family Zone (R2-1). The Project proposes a mixed-use (commercial and residential) development comprised of two buildings with a total gross building area of approximately 229,807 SF, with approximately 217,827 SF of commercial (self-storage floor area, 1,584 units) and approximately 11,980 SF of residential floor area (eight DU), which are not permitted within the Tentative "R1" One-Family Zone ([T]R-1), "R2" Two-Family Zone (R2-1), or "RA" Suburban Zone (RA-1) zones. Therefore, the Project seeks approval of a Zone Change to change the existing zoning from the Tentative "R1" One-Family Zone ([T]R-1), "R2" Two-Family Zone (R2-1), and "RA" Suburban Zone (RA-1) on 3.92 acres to Commercial Manufacturing Zone (CM-1) to allow for the proposed commercial and residential uses. Following approval of the requested Zone Change, no conflict with zoning would occur.

**Mitigation Measures**

No mitigation is required.

## 4.12 Mineral Resources

| Environmental Issue | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **Would the Project:** | | | | |
| a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? | | | X | |
| b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan? | | | X | |

### Impact Analysis

*4.12a Would the Project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?*

*4.12b 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?*

**Less Than Significant Impact.** The Surface Mining and Reclamation Act of 1975 (SMARA) requires the classification of land into mineral resource zones (MRZs) according to the area's known or inferred mineral potential.[41] According to the California Department of Conservation, the Project site is within MRZ-2, which means the site contains potentially significant sand and gravel deposits that are to be conserved.[42] However, the City's General Plan notes that much of the area within the MRZ-2 zone was developed with structures prior to the MRZ-2 classification and, therefore, is unavailable for extraction. Moreover, the Project site is in an urbanized area and is surrounded by residential and industrial uses. Mineral resource mining is not a compatible use with these land uses. The Project site is not large enough to effectively extract mineral resources. Considering the existing surrounding land uses and the incompatibility of mineral resource extraction activities in the Project area, potential significant mineral resources within the Project area are considered unavailable for extraction. Therefore, the Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state or a locally important mineral resource recovery site delineated on a land use plan. Impacts would be less than significant, and no mitigation is required.

### Mitigation Measures

No mitigation is required.

[41] California Department of Conservation. (2020). *Statutes and Regulations*. Retrieved from https://www.conservation.ca.gov/index/Documents/DMR-SR-1%20Web%20Copy.pdf.

[42] California Department of Conservation. (2021). *CGS Information Warehouse: Mineral Land Classification.* Retrieved from https://maps.conservation.ca.gov/cgs/informationwarehouse/mlc/

## 4.13 Noise

Information and analysis in this section is based primarily on the data provided in the following sources:

- Noise and Vibration Assessment for the 7528 N. Bellaire Avenue Project ("Noise Analysis")(Kimley-Horn and Associates, Inc., July 2024); see **Appendix 4.13-1: Noise and Vibration Assessment**.

| Environmental Issue | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **Would the Project:** | | | | |
| a) Generate 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? | | | X | |
| b) Generation of excessive ground-borne vibration or ground-borne noise levels? | | | X | |
| 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? | | | | X |

### Impact Analysis

*4.13a Would the Project generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

**Less Than Significant Impact.**

Construction.

*Onsite Construction Noise*

Construction noise typically occurs intermittently and varies depending on the nature or phase of construction (e.g., land clearing, grading, excavation). Noise generated by construction equipment, including earth movers and material handlers, can reach high levels that can affect noise-sensitive uses near the construction site. The Project's construction activities would include demolition, site preparation, grading, building construction, paving, and architectural coating. Noise levels associated with individual construction equipment to be used during Project construction are listed in **Table 4.13-1: Project Construction Equipment Noise Levels**.

It is noted that the values shown in **Table 4.13-1** are for the equipment when operating at full power 50 feet from the sensitive receptor, without any intervening structures or topography that may reduce noise levels. Construction noise was calculated by accounting for each piece of equipment's usage factor, or the fraction of time that the equipment would be in use at full power over a specific period. Other primary sources of acoustical disturbance may include random incidents, which would last less than one minute (such as the dropping of materials or the hydraulic movement of machinery lifts). It is also noted that due to the Project site constraints and standard construction practices, only a limited amount of equipment can operate on the Project site at a particular time. Following the City's proposed Noise and Vibration Update, construction noise was predicted at the nearest noise-sensitive receptors utilizing FHWA's Roadway Construction Noise Model (RCNM). Following the City's Noise and Vibration Update, when calculating construction noise, the loudest piece of equipment is assumed to operate at the property line nearest to the studied sensitive receptor, while all other equipment anticipated for each construction phase is assumed to operate at the Project site's center. This methodology accounts for equipment operating throughout the Project site and not at a fixed location for extended periods. Therefore, the distance used in the RCNM model was measured from the Project site property line to the nearest sensitive receptor property line (or 10 feet for adjacent sensitive receptors) for the loudest piece of equipment and measured from the center of the Project construction area to the sensitive receptor property line for all other pieces of equipment.

**Table 4.13-1: Project Construction Equipment Noise Levels**

| Construction Phase | Equipment[1] | Typical Noise Level (dBA $L_{max}$) at 50 feet from Source | Usage Factor (%) |
|---|---|---|---|
| Demolition | Concrete Saw | 90 | 20 |
| | Excavator | 81 | 40 |
| | Dozer | 82 | 40 |
| Site Preparation | Dozer | 82 | 40 |
| | Tractors/Loaders/Backhoes | 78 | 40 |
| Grading | Excavator | 81 | 40 |
| | Grader | 85 | 40 |
| | Dozer | 82 | 40 |
| | Tractor/Loaders/Backhoes | 78 | 40 |
| Building Construction | Crane | 81 | 16 |
| | Forklift | 85 | 50 |
| | Generator | 81 | 50 |
| | Tractors/Loaders/Backhoes | 78 | 40 |
| | Welder | 74 | 40 |
| Paving | Cement and Mortar Mixers | 79 | 40 |
| | Pavers | 77 | 50 |
| | Paving Equipment | 85 | 50 |
| | Rollers | 80 | 20 |
| | Tractors/Loaders/Backhoes | 84 | 40 |
| Architectural Coating | Compressor | 78 | 40 |

Source: Noise level and usage factor source: Federal Highway Association, Roadway Construction Noise Model, User Guide 2005
Equipment compiled based on air quality modeling defaults and contractor input.

**Table 4.13-2: Project Construction Noise Levels** shows the estimated maximum exterior construction noise levels at the sensitive receptor nearest the Project site.[43] A combination of the following City of Los Angeles Environmental Protection Measures (EPMs) will be included in the Project construction plans to

[43] For predicted construction noise levels for all construction phases, see **Appendix 4.13-1**.

minimize construction noise to the extent feasible. EPM-1 includes the proper maintenance of construction equipment and the installation of noise shielding/muffling devices. The FHWA indicates that muffler systems can reduce noise levels by 10 dBA or more.[44] Other noise shielding may include the use of sound aprons/shields attached to construction equipment to dampen/shield noise emanating from equipment engines, providing noise level reductions of between 10 and 20 dBA.[45] EPM-2 allows the use of driven (impact) pile systems only where underlying geology renders other methods infeasible. The proposed Project does not assume the use of drilled piles or impact piles. EPM-3 includes the enclosure or screening of outdoor mechanical equipment. Consistent with EPM-4, the construction staging areas would be located as far away from sensitive receptors as reasonably possible. EPM-5 requires the use of temporary noise barriers such as plywood walls with a minimum ½-inch thickness or sound blankets meeting a sound transmission class (STC) rating of 25. Sound blankets meeting an STC 25 rating can achieve a minimum 7 to 10 dBA reduction for construction equipment with 200 Hz or lower frequency.[46] With the implementation of EPM-1, EPM-3, EMP-4, and EPM-5, an up to 20 dBA reduction in noise is achievable, and it is reasonable and feasible to assume that construction noise levels would not exceed the applicable daytime construction noise threshold of 80 dBA $L_{eq}$. See **Appendix 4.13-1** for predicted construction noise for each construction phase.

**EPM -1** **Noise Shielding and Muffling.** Power construction equipment (including combustion engines), fixed or mobile, will be equipped with noise shielding and muffling devices consistent with manufacturers' standards or the Best Available Control Technology. All equipment will be properly maintained, and the Applicant or Owner will require any construction contractor to keep documentation on-site during any earthwork or construction activities demonstrating that the equipment has been maintained in accordance with manufacturer's specifications.

**EPM-2** **Use of Driven Pile Systems.** Driven (impact) pile systems not be used, except in locations where the underlying geology renders drilled piles, sonic, or vibratory pile drivers infeasible, as determined by a soils or geotechnical engineer and documented in a soils report.

**EPM-3** **Enclosure or Screening of Outdoor Mechanical Equipment.** All outdoor mechanical equipment (e.g., generators, compressors) will be enclosed or visually screened. The equipment enclosure or screen will be impermeable (i.e., solid material with minimum weight of two pounds per SF) and break the line of sight between the equipment and off-site receptors.

**EPM-4** **Location of Construction Staging Areas.** Construction staging areas shall be located as far from noise-sensitive uses as reasonably possible and technically feasible in consideration of site boundaries, topography, intervening roads and uses, and operational constraints. The burden of proving what constitutes "as far as possible" shall be upon the Applicant or Owner, in consideration of the above factors.

**EPM-5** **Temporary Walls.** Noise barriers, such as temporary walls (minimum ½-inch thick plywood) or sound blankets (minimum STC 25 rating), that are a minimum of eight feet

[44] Federal Highway Administration, *Special Report - Measurement, Prediction, and Mitigation*, *Chapter 4 Mitigation*, 2017.
[45] Federal Highway Administration, *Special Report – Measurement, Prediction, and Mitigation, Chapter 4 Mitigation*, 2017. Available at: https://www.fhwa.dot.gov/Environment/noise/construction_noise/special_report/hcn04.cfm.
[46] Environmental Noise Control. *Portable Acoustic Panels*, 2024. Available at: Portable Acoustic Panels - Environmental Noise Control (environmental-noise-control.com)

tall, shall be erected between construction activities and noise-sensitive uses as reasonably possible and technically feasible in consideration of site boundaries, topography, intervening roads and uses, and operational constraints. The burden of proving that compliance is technically infeasible shall be upon the Applicant or Owner. Technical infeasibility shall mean that noise barriers cannot be located between construction activities and noise-sensitive uses due to site boundaries, topography, intervening roads and uses, and/or operational constraints.

**Table 4.13-2: Project Construction Noise Levels**

| Receptor | Maximum Noise Level at Receptor Prior to EPMs ($L_{eq}$) [1, 2] | Maximum Noise Level at Receptor with EPMs ($L_{eq}$) [1, 2] | Noise Threshold (dBA $L_{eq}$) [3] | Exceeded? |
|---|---|---|---|---|
| Sensitive Receptor 1 – Residential (North) | 93.2 | 73.2 | 80 | **No** |
| Sensitive Receptor 2 – Candelabra Ministries (North) | 82.1 | 62.1 | | **No** |
| Sensitive Receptor 3 – Whitsett Tiny Home Village (Residential) (Southeast) | 84.7 | 64.7 | | **No** |
| Sensitive Receptor 4 – Residential (West) | 82.7 | 62.7 | | **No** |

1. Per the methodology described in the City's Construction Noise and Vibration Thresholds Update, it is assumed that the loudest piece of equipment would be operated near the Project property boundary and all other equipment would operate at the center of the Project site.
2. Assumes noise level reductions (up to 20 dBA) provided by EPM-1 (Noise Shielding and Muffling), EPM-3 (Enclosure or Screening of Outdoor Mechanical Equipment), EPM 4 (location of construction staging areas), and EPM-5 (Temporary Walls).
3. Per the City's Construction Noise and Vibration Thresholds Update, daytime construction noise shall be limited to a maximum of 80 dBA $L_{eq}$ at sensitive uses.

Source: Federal Highway Administration, *Roadway Construction Noise Model,* 2006. Refer to **Appendix 4.13-1** for noise modeling results for each construction phase.

As shown in **Table 4.13-2**, Project construction noise would not exceed the City's Noise and Vibration Update significance criterion of 80 dBA $L_{eq}$. In addition, construction-related noise would be temporary and would not result in a permanent increase in ambient noise levels in the area. Construction activities would also be prohibited between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday and 6:00 p.m. to 8:00 a.m. on Saturdays, and at any time on Sunday.[47] The City's permitted hours of construction are required in recognition that construction activities undertaken during daytime hours are a typical part of living in an urban environment and do not cause a significant impact. Therefore, the Project would not result in the generation of a substantial temporary increase in ambient noise levels in the Project site vicinity in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies during construction. Construction noise impacts would be less than significant, and no mitigation is required.

Off-Site Construction Noise. In addition to onsite construction noise, Project construction activities would generate mobile source noise from delivery/haul trucks and construction workers traveling to and from the Project site. Haul trucks would travel to and from the Project site using Saticoy Street and Bellaire Avenue. Haul and delivery trucks and construction workers are expected to arrive at the Project site before construction starts and leave when construction ends, and thus, would not overlap with the Project's construction equipment. In addition, construction workers would come from various directions

[47] Note that the City's Noise and Vibration Thresholds Update designates daytime hours as between the hours of 7:00 a.m. to 7:00 p.m. Monday through Friday. Project construction is not anticipated to occur after 7:00 p.m. Monday through Friday.

to the Project site. According to modeling assumptions included in the Air Quality Assessment,[48] the construction phase with the highest assumed number of haul trucks is grading. There would be up to 6 daily haul truck trips accessing the Project site during the grading phase. Assuming all six haul trucks would pass through the same roadway segment within a 15-minute period, the estimated noise level from grading haul truck trips would be 57.9 dBA $L_{eq}$ at 25 feet from the roadway centerline. This worst-case noise level would not exceed the City's Noise and Vibration Update significance criterion of 80 dBA $L_{eq}$ for on- and off-site construction activities. Therefore, the Project's potential off-site construction mobile source traffic noise impact would be less than significant, and no mitigation is required.

Operations. The Proposed Project consists of a mixed-use (commercial and residential) development comprised of two buildings with a self-storage facility and eight DU. Project operations would generate noise from mechanical equipment (e.g., HVAC, etc.), activities associated with loading/unloading storage items, parking areas (i.e., car door slamming, car radios, engine start-up, and car pass-by), and off-site traffic noise. Although these noise sources would be consistent with existing noise sources in the Project site vicinity, existing operational noise has not been accounted for in the analysis below to provide a conservative analysis.

Onsite Mechanical Equipment Noise. Potential stationary noise sources related to long-term Project operations would include mechanical equipment (e.g., HVAC equipment) located on the rooftops of the self-storage buildings and residential units. Mechanical equipment (e.g., HVAC equipment) typically generates noise levels of approximately 52 dBA at 50 feet.[49] Under LAMC Section 112.02 (Air Conditioning, Refrigeration, Heating, Pumping, Filtering Equipment), the operation of any air conditioning, refrigeration, or heating equipment shall not create any noise that would cause the noise level of another occupied property to exceed the ambient noise level by more than five dBA. Assuming that the mechanical equipment would be located within that portion of the rooftop nearest each sensitive receptor and not accounting for shielding provided by potential screening or architectural features, noise levels have been calculated and provided in **Table 4.13-3: Mechanical Equipment Noise Levels**. As shown, mechanical equipment noise levels would not increase ambient noise levels beyond the acceptable levels (5 dBA over ambient). Project mechanical equipment would not generate a substantial permanent increase in ambient noise levels in the Project vicinity in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Therefore, the Project would result in a less-than-significant noise impact related to onsite mechanical equipment operations, and no mitigation is required.

**Table 4.13-3: Mechanical Equipment Noise Levels**

| Receptor | Distance to Receptor (feet)[1] | Level at Receptor (dBA)[2] | Ambient Level (dBA)[3] | Ambient + Project Noise at Receptor (dBA) | Incremental Increase (dBA) | Incremental Increase Threshold (dBA) | Significant? |
|---|---|---|---|---|---|---|---|
| 1 – Residential (North) | 80 | 47.9 | 67.4 | 67.4 | 0.0 | 5.0 | No |
| 2 – Candelabra Ministries (North) | 155 | 42.2 | 67.4 | 67.4 | 0.0 | 5.0 | No |
| 3 – Whitsett Tiny Home Village (Southeast) | 70 | 49.1 | 54.6 | 55.7 | 1.1 | 5.0 | No |
| 4 – Residential (West) | 85 | 47.4 | 58.0 | 58.4 | 0.4 | 5.0 | No |

[48] Kimley-Horn and Associates, Inc. (2024 7528 N. Bellaire Avenue Mixed-Use Project ). Air Quality Assessment; **Appendix 4.3-1**.

[49] Elliott H. Berger, Rick Neitzel, and Cynthia A. Kladden, *Noise Navigator Sound Level Database with Over 1700 Measurement Values*, July 6, 2010

| Receptor | Distance to Receptor (feet)[1] | Level at Receptor (dBA)[2] | Ambient Level (dBA)[3] | Ambient + Project Noise at Receptor (dBA) | Incremental Increase (dBA) | Incremental Increase Threshold (dBA) | Significant? |
|---|---|---|---|---|---|---|---|

1. Distance estimated assuming equipment location in the center of the self-storage rooftop for Receptors 1, 2, and 3 and the center of the residential dwelling unit rooftop for Receptor 4.
2. Distance attenuation calculated assuming reference noise level of 52 dBA Leq at 50 feet: Source for reference level: Elliott H. Berger, Rick Neitzel, and Cynthia A. Kladden, *Noise Navigator Sound Level Database with Over 1700 Measurement Values*, July 6, 2010.
3. See **Appendix 4.13-1** for representative ambient noise levels.

Storage Loading/Unloading Activities. Self-storage unit patrons/leasers would commute to the Project site via private vehicles or small single-unit truck rentals to drop off or pick up their items from the storage units and then exit the site. Access to the site would occur via Bellaire Avenue. Loading/unloading activities would generate noise levels up to approximately 61 dBA at a distance of 50 feet.[50] The noise-sensitive receptors (i.e., residential land uses) nearest the proposed self-storage facility loading/unloading activities would be approximately 155 feet to the southeast.

As shown in **Table 4.13-4: Storage Loading/Unloading Noise** Levels, noise levels from the storage loading/unloading activities would not increase ambient noise levels beyond the acceptable levels (5 dBA over ambient pursuant to the City's Noise Regulations). In addition, individuals would use the facility periodically, and storage loading/unloading activities would occur throughout the Project site, resulting in lower noise levels than these estimates. Project storage loading/unloading activities would not generate a substantial permanent increase in ambient noise levels in the Project vicinity in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Therefore, the Project would result in a less-than-significant impact due to noise from storage loading/unloading activities, and no mitigation is required.

**Table 4.13-4: Storage Loading/Unloading Noise Levels**

| Receptor | Distance to Receptor (feet)[1] | Level at Receptor (dBA)[2] | Ambient Level (dBA)[3] | Ambient + Project Noise at Receptor (dBA) | Incremental Increase (dBA) | Incremental Increase Threshold (dBA) | Significant? |
|---|---|---|---|---|---|---|---|
| 1 – Residential (North) | 50 | 61.0 | 67.4 | 68.3 | 0.9 | 5.0 | No |
| 2 – Candelabra Ministries (North) | 65 | 58.7 | 67.4 | 68.0 | 0.6 | 5.0 | No |
| 3 – Whitsett Tiny Home Village (Southeast)[4] | 50 | 46.0 | 54.6 | 55.2 | 0.6 | 5.0 | No |
| 4 – Residential (West) | 340 | 44.3 | 58.0 | 58.2 | 0.2 | 5.0 | No |

1. Distance measured from storage truck loading/unloading areas to sensitive receptor property line.
2. Distance attenuation calculated assuming reference noise level of 61 dBA $L_{eq}$ at 50 feet: Source for reference level: Kariel, H. G., Noise in Rural Recreational Environments, Canadian Acoustics 19(5), 3-10, 1991.
3. See **Appendix 4.13-1** for representative ambient noise levels.
4. The Whitsett Tiny Home Village (residential) sensitive receptors assumed a minimum 15 dBA reduction due to the self-storage building that stands between the noise source (truck loading/unloading areas) and the sensitive receptor, which completely shields the noise source.

Onsite Parking. Vehicles would access the Project site's parking lot via one gated driveway on North Bellaire Avenue. The Project proposes 16 spaces within the apartment garages and 76 surface parking spaces. Of the 76 surface parking spaces, 68 spaces would be provided for the self-storage facility, while eight spaces would be provided for the apartment development's guests. Noises associated with parking activities include noise associated with vehicles starting and stopping, vehicle doors closing, car horns and

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

alarms, loading and unloading, and conversations. The noise levels from these activities range from 53 to 61 dBA at 50 feet and are short-term.[51]

As shown in **Table 4.13-5: Onsite Parking Noise** Levels, noise levels from the onsite parking activities would not increase ambient noise levels beyond the acceptable levels (5 dBA over ambient pursuant to the City's Noise Regulations). Therefore, noise levels generated by Project parking activities would not generate a substantial permanent increase in ambient noise levels in the Project vicinity in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. The potential impacts would be less than significant, and no mitigation is required.

**Table 4.13-5: On-site Parking Noise Levels**

| Receptor | Distance to Receptor (feet) [1] | Level at Receptor (dBA)[2] | Ambient Level (dBA)[3] | Ambient + Project Noise at Receptor (dBA) | Incremental Increase (dBA) | Incremental Increase Threshold (dBA) | Significant? |
|---|---|---|---|---|---|---|---|
| 1 – Residential (North) | 50 | 61.0 | 67.4 | 68.3 | 0.9 | 5.0 | No |
| 2 – Candelabra Ministries (North) | 50 | 61.0 | 67.4 | 68.3 | 0.9 | 5.0 | No |
| 3 – Whitsett Tiny Home Village (Southeast) | 475 | 41.4 | 54.6 | 54.8 | 0.2 | 5.0 | No |
| 4 – Residential (West) | 60 | 59.4 | 58.0 | 61.8 | 3.8 | 5.0 | No |

1. Distance measured from parking areas for the self-storage building for Receptors 1, 2, and 3 and the parking areas for the residential DUs for Receptor 4.
2. Distance attenuation calculated assuming reference noise level of Kariel, H. G., *Noise in Rural Recreational Environments*, Canadian Acoustics 19(5), 3-10, 1991.
3. See **Appendix 4.13-1** for representative ambient noise levels.

On-site Composite Noise. An evaluation of the Project's composite noise levels, including all onsite Project-related noise sources discussed above, plus the existing ambient level, was conducted to identify the potential maximum Project-related noise level increase that may occur at noise-sensitive receptor locations. The overall sound environment of the areas surrounding the Project site would include contributions from each onsite noise source associated with Project operations. The Project's onsite noise sources would include the use of mechanical equipment, storage loading/unloading activities, and on-site parking. **Table 4.13-6: Composite Onsite Noise Levels**, presents the estimated composite noise from onsite Project-related operational noise sources at the nearest noise-sensitive receptors. As reported in **Table 4.13-6**, the Project would result in a maximum increase of 4.0 dBA at the residential receptors located to the west of the Project site. Composite Project noise levels would be below the five dBA significance threshold. Composite operational noise would not generate a substantial permanent increase in ambient noise levels in the Project vicinity in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Therefore, the onsite composite operational noise level impacts would be less than significant, and no mitigation is required.

**Table 4.13-6: Composite Onsite Noise Levels**

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

| Receptor[1] | Mechanical Equipment (dBA) | Storage Loading/ Unloading (dBA) | Onsite Parking (dBA) | Ambient Level (dBA)[1] | Ambient + Project Noise at Receptor (dBA) | Incremental Increase (dBA) | Incremental Increase Threshold (dBA) | Significant? |
|---|---|---|---|---|---|---|---|---|
| 1 – Residential (North) | 47.9 | 61.0 | 61.0 | 67.4 | 69.1 | 1.7 | 5.0 | No |
| 2 – Candelabra Ministries (North) | 42.2 | 58.7 | 61.0 | 67.4 | 68.8 | 1.4 | 5.0 | No |
| 3 – Whitsett Tiny Home Village (Southeast) | 49.1 | 46.0 | 41.4 | 54.6 | 56.3 | 1.7 | 5.0 | No |
| 4 – Residential (West) | 47.4 | 44.3 | 59.4 | 58.0 | 62.0 | 40. | 5.0 | No |
| 1. See **Appendix 4.13-1** for representative ambient noise levels. | | | | | | | | |

Off-Site Traffic Noise. The Project would generate increased traffic volumes along nearby roadway segments. According to the Project's average daily traffic (ADT) volumes(see **Appendix 4.13-1**),[52] the Project would increase the ADT volumes, resulting in mobile source noise level increases on the Project site area roadways. Traffic noise levels for roadways primarily affected by the Project were calculated using the FHWA's Highway Noise Prediction Model (FHWA-RD-77-108). Traffic noise modeling was conducted for conditions with and without the Project, based on the Project's traffic volumes.[53] As shown in **Table 4.13-7: Existing and Existing Plus Project Traffic Noise Levels**, Existing Plus Project traffic-generated noise levels on Project site area roadways would range between 50.8 dBA CNEL and 63.1 dBA CNEL at 100 feet from the roadway centerline, and the Project would result in a maximum increase of 0.3 dBA CNEL along Saticoy Street west of Bellaire Avenue. Traffic noise increases would not exceed acceptable levels as shown below. Therefore, noise levels generated by Project ADT would not generate a substantial permanent increase in ambient noise levels in the Project vicinity in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. The potential impacts would be less than significant, and no mitigation is required.

**Table 4.13-7: Existing and Existing Plus Project Traffic Noise Levels**

| Roadway Segment | Existing | | Existing + Project | | Incremental Increase | Significant Impact? |
|---|---|---|---|---|---|---|
| | ADT | dBA CNEL[1] | ADT | dBA CNEL[1] | | |
| Saticoy Street west of Bellaire Avenue | 1,306 | 51.8 | 1,395 | 52.1 | 0.3 | **No** |
| Saticoy Street east of Coldwater Canyon Avenue | 16,557 | 62.9 | 16,646 | 62.9 | 0.0 | **No** |
| Bellaire Avenue north of Saticoy Street | 3,811 | 50.7 | 3,900 | 50.8 | 0.1 | **No** |
| Bellaire Avenue south of Saticoy Street. | 6,087 | 57.6 | 6,158 | 57.7 | 0.1 | **No** |
| Saticoy Street S. east of Bellaire Avenue | 17,514 | 63.1 | 17,620 | 63.1 | 0.0 | **No** |
| ADT = average daily trips; dBA = A-weighted decibels; CNEL= Community Equivalent Noise Level | | | | | | |
| 1. Traffic noise levels are at 100 feet from the roadway centerline. | | | | | | |
| Source: Based on traffic data provided by Kimley-Horn and Associates, Inc., February 2024. Refer to **Appendix 4.13-1** for traffic noise modeling results. | | | | | | |

[52] Kimley-Horn and Associates, Inc., *Existing and Existing Trips + Projects Trips, 7528 N. Bellaire Avenue Project Technical Memo*, 2024.
[53] Kimley-Horn and Associates, Inc., *Trip Generation and VMT Technical Memo for the 7528 North Bellaire Avenue Mixed-Use Project*, June 2024.

### *4.13b Would the Project generate excessive groundborne vibration or groundborne noise levels?*

**Less Than Significant Impact.**

On-site Construction Vibration. The Project's increases in ground-borne vibration levels would be primarily associated with short-term construction-related activities. Project construction would have the potential to result in varying degrees of temporary ground-borne vibration, depending on the specific construction equipment used and the operations involved.

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

**Table 4.13-8: Typical Construction Equipment Vibration Levels** lists the reference vibration levels for typical construction equipment (measured at 25 feet). Vibratory equipment expected to be used at the Project site would include large bulldozers, loaded haul trucks, jackhammers, and small bulldozers/trucks. The ground-borne vibration generated by construction equipment spreads through the ground and diminishes in magnitude with distance. As shown in **Table 4.13-8**, based on FTA data, vibration velocities from typical heavy construction equipment that would be used during Project construction range from 0.003 to 0.089 in/sec PPV at 25 feet from the source of activity. As shown in **Table 4.13-8**, at 20 feet, the operation of large bulldozers, loaded haul trucks, jackhammers, and small bulldozers/trucks would not exceed the City's threshold of 0.3 in/sec PPV for older residential uses or 0.5 in/sec PPV for new residential, and modern industrial and commercial structures. The Project's onsite construction vibration impacts would be less than significant, and no mitigation is required.

**Table 4.13-8: Typical Construction Equipment Vibration Levels**

| Equipment | Reference Level PPV at 25 Feet (in/sec) | PPV at 20 Feet (in/sec) |
|---|---|---|
| Large bulldozer | 0.089 | 0.12 |
| Loaded Trucks | 0.076 | 0.11 |
| Jackhammer | 0.035 | 0.05 |
| Small Bulldozer/Tractors | 0.003 | 0.00 |
| **Structural Damage Threshold** | **0.30** | **0.30** |
| Exceeds Thresholds? | **No** | **No** |

Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018.
* Equipment not anticipated to be required at this distance.

Off-Site Construction Vibration. Concerning construction trucks, Project construction would involve truck travel along nearby roadways, generating vibration events with each passing truck. Due to the size constraints of the Project site, it is assumed that one truck would be arriving/leaving the Project site at a time. According to the FTA's Transit Noise and Vibration Impact Assessment, a truck rarely creates vibration levels that exceed 70 VdB (equivalent to 0.012 inches per second PPV) when on a roadway. The factors influencing levels of ground-borne vibration include vehicle speed, vehicle suspension, wheel

condition, and type. The frequency of vibration events is not listed as an influencing factor for vibration velocity by the FTA. As such, multiple trucks traveling along the roadway would increase the frequency of vibration events but would not affect the vibration velocity experienced by receptors. Therefore, the Project's off-site construction vibration impacts would be less than significant, and no mitigation is required.

On-site Ground-Borne Noise. According to the FTA, airborne noise levels would be higher than ground-borne noise levels. Unless indoor receptors have substantial sound insulation (e.g., recording studio) and would be exposed to vibration velocities great enough to cause substantial levels of ground-borne noise, ground-borne noise does not need to be assessed. Ground-borne noise is typically assessed for locations where subway or tunnel operations, where there is no airborne noise path, are present. The Project would not include a subway or tunnel, and all construction equipment would be located at grade. In addition, there are no substantially insulated indoor noise receptors located within the area surrounding the Project site. Therefore, the effects of airborne noise would still be higher than ground-borne noise levels.

According to the FTA, ground-borne A-weighted noise levels can be estimated utilizing the average vibration velocity level. For low-frequency ground vibration such as that generated by construction equipment, the ground-borne noise level is estimated by subtracting 50 dB from the vibration velocities (VdB). The use of a large bulldozer[54] at approximately 20 feet from the residential buildings to the north would generate vibration velocities of up to 90 VdB and ground-borne noise levels of up to 40 dBA. This level would not exceed the FTA's standard of 43 dBA at Category 2 Buildings (residences and buildings where people normally sleep) for infrequent vibration events. Therefore, impacts related to ground-borne noise during Project construction would be less than significant, and no mitigation is required.

Operation. Concerning vibration-generating activities, Project operations would primarily involve personal automobiles used by employees, customers, and residents accessing the surface parking, and automobiles used during loading and unloading. Due to the rapid drop-off rate of ground-borne vibration and the short duration of the associated events, vehicular traffic-induced ground-borne vibration is rarely perceptible beyond the roadway right-of-way and rarely results in vibration levels that cause damage to buildings in the vicinity. According to the FTA's Transit Noise and Vibration Impact Assessment, trucks rarely create vibration levels that exceed 70 VdB (equivalent to 0.012 inches per second PPV) when they are on roadways. Therefore, Project operations would result in less than significant ground-borne vibration impacts, and no mitigation is required.

*4.13c Would the Project be located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the project area to excessive noise levels?*

**No Impact.** The Project site is located approximately 2.2 miles southeast of the Hollywood-Burbank Airport and is not located within the Airport's Planning Boundary/Influence Area. The Project site is not within an existing or projected noise contour associated with any private or public airport. The Project would not expose people residing or working in the Project area to excessive noise levels. Therefore, no impacts would occur, and no mitigation is required.

[54] The large bulldozer was chosen for this portion of the analysis because it is the piece of equipment that generates the highest rate of ground-borne vibration; see Table 4.13-7.

**Mitigation Measures**

No mitigation is required.

## 4.14 Population and Housing

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

### Impact Analysis

*4.14a Would the Project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?*

**Less Than Significant Impact.** The Project proposes to remove all existing onsite improvements (i.e., a single-family residential DU and various accessory structures/sheds) and in their place, construct a mixed-use (commercial and residential) development, with approximately 217,827 SF of commercial (self-storage space) (up to 1,584 units) and eight DU. The proposed mixed-use development is summarized in **Table 2-4: Summary of Proposed Project**. The Project proposes eight DU and, thus, would induce population growth in the City directly through housing development. Given the scale and nature of office use, it is assumed any employment associated with these uses would not induce direct population growth in the City. It is assumed the new jobs could be filled by residents who already reside within the City or in the surrounding area. As concluded below, the Project's forecast population growth is not considered substantial. Additionally, the Project does not propose to extend roads or other infrastructure; thus, it would not indirectly induce population growth in the City.

Existing Plus Project Conditions. As previously noted, the Project includes an eight-unit apartment development, which would induce population growth in the City directly through new housing. **Table 4.14-1: Existing Plus Project Growth Forecast** compares the Project's estimated population growth to the existing 2024 population. As indicated in **Table 4.14-1**, the Project is forecast to increase the City's existing 2024 housing stock to 1,567,934 DU, representing approximately a 0.0006 percent increase in housing. As also indicated in **Table 4.14-1**, the Project's forecast population growth of 21 persons is estimated to increase the City's 2024 population to 3,814,339 persons, representing an approximately 0.0006 percent increase in population.

**Table 4.14-1: Existing Plus Project Growth Forecast**

| Description | Housing (Dwelling Units) | Population (Persons) |
|---|---|---|
| City 2024 Existing Conditions[1] | 1,567,926 | 3,814,318 |
| Proposed Project | 8 | 21[2] |
| Existing + Project | 1,567,934 | 3,814,339 |
| Percent Change from Existing | 0.0006% | 0.0006% |

Notes:
1. Southern California Association of Governments. (2024). *Connect SoCal 2024 Demographics and Growth Forecast*.
2. Based on eight DU, 100 percent occupancy, and 2.6 persons per household (Southern California Association of Governments, 2024 2024), which is slightly more conservative than the 2.5 persons per household estimate from the Department of Finance. *Connect SoCal 2024 Demographics and Growth Forecast) and (State of California, Department of Finance. (2024). 2024 Report E-5 Population and Housing Estimates for Cities, Counties, and the State.)*

Connect SoCal 2024 forecasts the City's population will reach 4,748,920 persons by 2050, which is an increase of approximately 934,602 persons compared to the existing 2024 population of 3,814,318, as shown in **Table 4.14-1**, or approximately 20 percent between 2024 and 2050.[55] Similarly, SCAG's Connect SoCal 2024 forecasts the City's households will increase by approximately 260,274 households, or approximately 14 percent, between 2024 and 2050. SCAG's Connect SoCal 2024 assumes 1,828,200 households in the City by 2050, with a population of 4,748,920 persons.

SCAG is based on the adopted General Plan land use. As shown in **Table 2-1: Existing Land Use Designations** and depicted on **Exhibit 2-3: Existing General Plan Land Use Map**, 0.59 AC on the Project site is designated Low Residential, which has an allowable density of 4 to 12 DU/net acre. Assuming 6.5 DU/AC, which is the midpoint, the residential development capacity for this portion of the Project site is four dwellings. Based on four DU, 100 percent occupancy, and 2.6 persons per household (see **Table 4.14-1: Existing Plus Project Growth Forecast**), the population associated with this portion of the Project site is approximately 10 persons.

**Table 4.14-2: SCAG Connect SoCal 2024 Plus Project Growth Forecast** evaluates the Project's contribution to 2050 growth forecasts.

**Table 4.14-2: SCAG Connect SoCal 2024 Plus Project Growth Forecast**

| Description | Households/Housing (Dwelling Unit) | Population (Persons) |
|---|---|---|
| **Connect SoCal + Project** | | |
| Forecast 2050 Connect SoCal[1] | 1,828,200 | 4,748,920 |
| Proposed Project | +8 | +21[2] |
| Existing Land Use Designation (0.59 AC) | -4 | -10 |
| Proposed Project Net | +4 | +11 |
| **2045 Forecast Connect SoCal Plus Project** | 1,828,204 | 4,748,931 |
| **2050 Forecast Connect SoCal Plus Project % Change** | 0.0003% | 0.0003% |
| **EXISTING + Project** | | |
| Existing + Project | 1,567,934 | 3,814,339 |
| 2050 Forecast Connect SoCal | 1,828,200 | 4,748,920 |
| **Exceeds 2050 Forecast Connect SoCal?** | **No** | **No** |

[55] SCAG, *Demographics and Growth Forecast, 2024-2050 Regional Transportation Plan/Sustainable Communities Strategies.* Los Angeles, California, April 2024.

Notes:
1. Southern California Association of Governments. (2024). *Connect SoCal 2024 Demographics and Growth Forecast*.
2. Based on eight DU, 100 percent occupancy, and 2.6 persons per household (Southern California Association of Governments. (2024). *Connect SoCal 2024 Demographics and Growth Forecast)*

As indicated in **Table 4.14-2**, the Project would increase Connect SoCal 2024 forecast 2050 population by approximately 0.0003 percent (11 persons) and households by approximately 0.0003 percent (four DU). Therefore, the Project would cause the 2050 household and population growth forecasts to be exceeded, thus would induce unplanned population growth directly through new housing. However, the Project's forecast net population growth of 11 persons is nominal and not considered substantial concerning Connect SoCal 2024 based on the following factors:

- The Project's forecast net population growth of 11 persons would constitute a nominal 0.0005 percent increase over the forecast population in 2050; and
- As shown in **Table 4.14-2**, the Project's estimated housing and population growth, which would increase the City's existing 2024 housing stock and population to 1,567,934 and 3,814,339 persons, respectively, would not cause Connect SoCal 2024 population and housing growth forecasts to be exceeded; and
- The Project would help the City meet its Regional Housing Needs Allocation.

Therefore, the Project would induce unplanned population growth in the City directly through housing development, but impacts would be less than significant based on the factors discussed above.

### *4.14b Would the Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

**Less Than Significant Impact.** As shown on **Exhibit 2-2**, the Project site is vacant/unimproved except for one vacant single-family residential DU and various accessory structures/sheds. The Project proposes to remove all existing onsite improvements and in their place construct eight DU. The Project would remove only one DU, and it is vacant. Moreover, the Project proposes eight DU, resulting in a net increase of eight DU on-site. Therefore, the Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. Impacts would be less than significant, and no mitigation is required.

**Mitigation Measures**

No mitigation is required.

## 4.15 Public Services

| Environmental Issue | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physical 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? | | | X | |
| b) Police protection? | | | X | |
| c) Schools? | | | X | |
| d) Parks? | | | X | |
| e) Other public facilities? | | | X | |

### Impact Analysis

*4.15a Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, need for new or physical altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection?*

**Less Than Significant Impact.** The LAFD provides fire protection and emergency medical services to the City. The fire station nearest the Project site is Fire Station 89, located approximately 1.2 miles from the Project site, at 7063 Laurel Canyon Boulevard. The Project site is currently vacant/unimproved except for one vacant single-family residential DU within an urbanized area of the City. The Project proposes to remove the existing onsite structures and develop a mixed-use (commercial and residential) development. The Project site would be accessible via one driveway on North Bellaire Avenue, which would allow emergency access.

As concluded in **Section 4.14: Population and Housing**, the Project would generate a population growth of approximately 21 persons. The Project's forecast population growth and new commercial uses would incrementally increase the demand for fire protection and emergency medical services at the Project site. However, the Project site is currently served by fire protection services and is located in an urban setting where fire protection services and equipment/infrastructure are already in place. Additionally, as part of the development review process, LAFD Fire Development Services would review the proposed Project site plan and determine if access and water system requirements, which would enhance the proposed development's fire protection, are adequate. Further, the Project would be required to comply with standard LAFD conditions of approval. Specifically, the LAFD review addresses fire and life safety requirements for project construction at the fire plan check stage. This includes a plan review of the design details of the architectural, structural, mechanical, plumbing, and electrical systems. The Project would be required to comply with applicable City, County, and State code requirements for fire protection. LAMC

Article 7, *Fire Protection and Prevention (Fire Code)*, adopts the Los Angeles Fire Code and portions of the 2022 California Fire Code and 2021 International Fire Code. Implementation of all Fire Code requirements would further reduce potential impacts concerning fire protection services. Therefore, the Project would not require new or physically altered fire protection facilities to maintain acceptable service ratios, response times, or other performance objectives, and adverse physical impacts associated with the construction of fire protection facilities would not occur. Impacts would be less than significant, and no mitigation is required.

*4.15b Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, need for new or physical altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection?*

**Less Than Significant Impact.** The City of Los Angeles Police Department (LAPD) provides police protection services to the City, including the Project site. The police station nearest the Project site is the North Hollywood Community Police Station, located approximately 3.1 miles from the Project site, at 11640 Burbank Boulevard. The Project site is currently vacant/unimproved except for one vacant single-family residential DU within an urbanized area of the City. The Project proposes to remove the existing onsite structures and develop a mixed-use (commercial and residential) development. The Project site would be accessible via one driveway on North Bellaire Avenue, which would allow emergency access.

As concluded in **Section 4.14**, the Project would generate a population growth of approximately 21 persons. The Project's forecast population growth and new commercial uses would incrementally increase the demand for police protection services at the Project site. However, the Project site is currently served by police protection services and is located in an urban setting where police protection services and equipment/infrastructure are already in place. Additionally, as part of the development review process, the LAPD would review the Project concerning emergency access and site/facility security requirements and recommendations. LAPD would review the Project plans to ensure compliance with applicable City regulations, to ensure adequate site signage, lighting, and other crime safety preventative measures are implemented. The LAPD review would ensure that development would conform to LAPD emergency access, thereby reducing demands on law enforcement services. Therefore, the Project would not require new or physically altered police protection facilities to maintain acceptable service ratios, response times, or other performance objectives, and adverse physical impacts associated with the construction of police protection facilities would not occur.. Impacts would be less than significant, and no mitigation is required.

*4.15c Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, need for new or physical altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools?*

**Less Than Significant Impact.** The Project site is within the boundaries of the Los Angeles Unified School District (LAUSD). Schools serving the Project site would include Saticoy Elementary School, James Madison Middle School, and John H Francis Polytechnic Senior High School. The Project site is approximately 0.9 miles from Saticoy Elementary School, 1.1 miles from James Madison Middle School, and 1.6 miles from

John H Francis Polytechnic Senior High School. The LAUSD's 2024 Developer Fee Justification Study reports that LAUSD facilities' capacity exceeded student enrollment for all levels in 2024.[56]

**Table 4.15-1: Project Forecast Student Generation (Residential)** provides the student generation rates by grade level for the proposed residential uses.

**Table 4.15-1: Project Forecast Student Generation (Residential)**

| Grade Level | Student Generation Factor (per DU) | Proposed Dwelling Units | Total Students Generated |
|---|---|---|---|
| Transitional Kindergarten – 6 | 0.194 | 8 | 2 |
| 7 – 8 | 0.053 | | 1 |
| 9 – 12 | 0.105 | | 1 |
| Special Day Class | 0.015 | | 1 |
| | | ***Total*** | 5 |

Source: Los Angeles Unified School District. (2024). *2024 Developer Fee Justification Study*, *Table 3 Los Angeles Unified Student Generation Factors.*

**Table 4.15-2: Project Forecast Student Generation (Commercial)** provides the student generation rates for the proposed self-storage facility.

**Table 4.15-2: Project Forecast Student Generation (Commercial)**

| Type | Student Generation Factor (per 1,000 SF) | Proposed Self-Storage SF | Total Students Generated |
|---|---|---|---|
| Rental Self-Storage | 0.011 | 217,827 SF | 3 |
| | | ***Total*** | 3 |

Source: Los Angeles Unified School District. (2024). *2024 Developer Fee Justification Study*, *Table 15, Los Angeles Unified Summary of Commercial and Industrial Uses.*

As shown in **Table 4.15-1** and **Table 4.15-2**, the Project is estimated to generate a total of eight LAUSD students. According to Table 8 of the LAUSD 2024 Developer Fee Justification Study, there was a surplus of 57,032 seats for transitional kindergarten through 6th grade, 4,597 surplus 7th and 8th-grade seats, 32,527 surplus 9th through 12th-grade seats, and 11,272 surplus special day class seats available. Therefore, there would be sufficient capacity at LAUSD facilities to accommodate the Project's proposed student enrollment. Further, the Project would be subject to payment of school impact fees in accordance with Senate Bill (SB) 50. Under Government Code §65995(3)(h), "payment of statutory fees is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use or development of real property…" Currently, residential development school impact fees are $5.17 per SF, and rental self-storage school impact fees are $0.28 per SF.[57] The Project would pay developer fees in compliance with the established regulatory framework to support the provision of adequate school services.

[56] Los Angeles Unified School District. (2024). *2024 Developer Fee Justification Study.* Available at: https://www.lausd.org/cms/lib/CA01000043/Centricity/Domain/921/LAUSD%20Dev%20Fee%20Study%202024.pdf

[57] Los Angeles Unified School District. (2024). *2024 Developer Fee Justification Study.* Available at: https://www.lausd.org/cms/lib/CA01000043/Centricity/Domain/921/LAUSD%20Dev%20Fee%20Study%202024.pdf

Therefore, the Project does not propose and would not require new or physically altered school facilities to maintain acceptable service ratios or other performance objectives because there is existing capacity at LAUSD facilities. Adverse physical impacts associated with the construction of school facilities would not occur. Impacts would be less than significant, and no mitigation is required.

*4.15d Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered park facilities, need for new or physical altered park facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks?*

**Less Than Significant 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 4.16: Recreation.** As discussed in Section 4.14: Population and Housing, the Project would not introduce a substantial new residential population. Therefore, the Project would not result in a substantial increase in park usage such that new or physically altered park facilities would be needed to maintain acceptable service ratios or other performance objectives. Further, the Project proposes open spaces and recreational amenities for future residents. A less-than-significant impact would occur, and no mitigation is required.

*4.15e Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, need for new or physical altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for library facilities?*

**Less Than Significant Impact.** The Los Angeles Public Library (LAPL) provides library services to the City. LAPL has a six-million-volume book collection as well as magazines, newspapers, government publications, and many specialized materials, including online databases. The libraries nearest the Project site are the Valley Plaza Branch Library, located approximately 1.4 miles from the Project site at 12311 Vanowen Street, and the Sun Valley Branch Library, located approximately 3.1 miles from the Project site at 7935 Vineland Avenue.

The Project's forecast population growth of 21 persons, thereby increasing demand for library services provided at the Valley Plaza and Sun Valley libraries. Both the Valley Plaza and the Sun Valley libraries also operate an online catalog and digital library. Residents and visitors can access library resources from the catalog. Given the existing facilities, the Project does not propose and would not require new or physically altered library facilities to maintain acceptable service ratios or other performance objectives, and adverse physical impacts associated with the construction of library facilities would not occur. A less-than-significant impact would occur, and no mitigation is required.

**Mitigation Measures**

No mitigation is required.

## 4.16 Recreation

| Environmental Issue | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **Would the Project:** | | | | |
| a) 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? | | | X | |
| 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? | | | X | |

### Impact Analysis

*4.16a 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?*

*4.16b 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?*

**Less Than Significant Impact.** The Project's forecast population growth of approximately 21 persons could incrementally increase the use of existing neighborhood or regional parks or other recreational facilities. However, this incremental increase would not be such that substantial physical deterioration of an existing recreational facility would occur or be accelerated. To offset the use of existing neighborhood and regional parks, the Project proposes private and common open space uses. The Project provides 3,045 SF of common open space for the proposed DUs.

Therefore, considering the Project's proposed open space, the Project would not 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. A less-than-significant impact would occur, and no mitigation is required.

### Mitigation Measures

No mitigation is required.

## 4.17 Transportation

Information and analysis in this section is based primarily on the data provided in the following sources:

- 7528 North Bellaire Avenue Mixed-Use Project Trip Generation Technical Memorandum ("Trip Generation TM") (Kimley-Horn and Associates, Inc., March 2024); see **Appendix 4.17-1: Trip Generation Memorandum**
- Transportation Study Assessment Referral Form ("LADOT Referral Form")(Los Angeles Department of Transportation (LADOT), June 2024); see **Appendix 4.17-2: LADOT Referral Form**.

| Environmental Issue | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **Would the Project:** | | | | |
| a) Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycles, and pedestrian facilities? | | | X | |
| b) Conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)? | | | X | |
| c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (for example, farm equipment)? | | | X | |
| d) Result in inadequate emergency access? | | | X | |

### Impact Analysis

*4.17a Would the Project conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?*

**Less Than Significant Impact.** Please refer to Error! Reference source not found. and **Table 4.11-2**, which evaluates the Project's consistency with the General Plan. The analysis finds that the Project would not conflict with the applicable Mobility Element policies. Transit, roadway, bicycle, and pedestrian facilities are discussed further below.

Transit. As discussed in **Section 2.0: Project Description**, LA Metro Line 169 serves the Project site via two bus stops on both the north and south sides of South Saticoy Street at the Bellaire Avenue and South Saticoy Street Intersection (i.e., approximately 610 feet and 643 feet south of the Project site, respectively). The Project proposes a mixed-use development (commercial and residential) with a forecast population growth of approximately 21 persons, which has the potential to increase public transit ridership. However, as concluded in **Table 4.11-2**, the Project would not conflict with the General Plan Mobility Element policies concerning transit facilities. Therefore, the Project would not conflict with a program, plan, ordinance, or policy concerning transit facilities, and a less-than-significant impact would occur in this regard.

Roadways. Vehicular access to the Project site would be provided via one driveway on Bellaire Avenue. All roadway and driveway improvements would be constructed according to LAFD requirements. There are no proposed off-site roadway improvements. Therefore, the Project would not conflict with a program, plan, ordinance, or policy concerning roadway facilities, and a less than significant impact would occur in this regard.

Bicycle Facilities. There are no bicycle facilities adjacent to the Project site. In March 2011, the Los Angeles City Council adopted the 2010 Bicycle Plan, which designated backbone, neighborhood, and green bikeway networks for the entire City. Today, the 2010 Bicycle Plan has been incorporated into the City's Mobility Plan 2035. The Mobility Plan (Map D1-D2) depicts the existing and proposed bicycle facilities within the City. According to the Mobility Plan, no bicycle facilities are proposed adjacent to the Project site. Under LAMC §12.21 A.16, *Bicycle Parking,* the Project would require 25 short-term bicycle parking spaces and 24 long-term bicycle parking spaces. The Project proposes 25 short-term and 24 long-term bicycle parking spaces, which meet LAMC standards and also support Mobility Plan Policy 3.8 to "provide bicyclists with convenient, secure and well-maintained bicycle parking facilities" by providing bicycle amenities and parking for on-site residents, visitors, and employees. Therefore, the Project would not conflict with a program, plan, ordinance, or policy concerning bicycle facilities, and a less than significant impact would occur in this regard.

Pedestrian Facilities. A sidewalk is located adjacent to the Project site along Bellaire Avenue. The Project would not remove existing sidewalks or significantly impact pedestrian access or facilities. Therefore, the Project would not conflict with a program, plan, ordinance, or policy concerning pedestrian facilities, and a less than significant impact would occur.

Overall, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. The Project would result in a less-than-significant impact, and no mitigation is required.

### *4.17b Would the Project conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?*

**Less Than Significant Impact.** A trip generation analysis was conducted for the Project (**Appendix 4.17-1**). The Project's estimated trip generation was calculated using the Institute of Transportation Engineers (ITE) Trip Generation Manual, 11th Edition (2021) trip generation rates. As concluded in **Appendix 4.17-1**, the Project is anticipated to generate 353 daily trips, with up to 12 trips during the AM peak hour and up to 16 trips during the PM peak hour. Using the trip generation calculated in **Appendix 4.17-1**, LADOT reviewed and signed the Transportation Study Assessment Referral Form No. CP-2151.1 (see **Appendix 4.17-1**) for the Project on June 6, 2024, and concluded that a VMT Analysis is not required because the Project would not generate a net increase of 500 or more daily vehicle trips. Therefore, the Project would not conflict with State CEQA Guidelines §15064.3, subdivision (b). Impacts would be less than significant, and no mitigation is required.

### *4.17c Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*

**Less Than Significant Impact.** Project construction may require temporary lane closures for utility hookups and loading of large equipment. However, no full lane closures are anticipated, and any closures would

be temporary and done in coordination with the City. Project construction activities would not increase hazards due to a geometric design feature or incompatible use.

Primary vehicular access to the Project site would be provided via one driveway on Bellaire Avenue. Driveway engineering would comply with the City's engineering standards to maintain an adequate line of sight, thereby reducing vehicle and pedestrian conflicts and hazards. Additionally, internal drive aisles would accommodate standard fire land turning radii, and hammerhead turnaround maneuvers would be designed for emergency vehicles and fire services. Project driveway and internal circulation improvements would be constructed according to City and LAFD standards. The Project proposes a mixed-use (commercial and residential) development within an urbanized portion of the City. The Project does not include any incompatible vehicles or equipment on the site, such as farm equipment. Project operations would not include sharp curves or dangerous intersections or introduce incompatible uses. Therefore, the Project would not increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). Impacts would be less than significant, and no mitigation is required.

### *4.17d Would the Project result in inadequate emergency access?*

**Less Than Significant Impact.** North Bellaire Avenue provides direct access to the Project site and would serve as a primary evacuation and emergency access route within the area. Project construction and operation would not place any permanent physical barriers on North Bellaire Avenue. There is the potential that one or more traffic lanes located immediately adjacent to the Project site may be temporarily closed or controlled by construction personnel during construction activities. Any temporary street closures would be required to receive permission from the appropriate Council District(s) and LAFD per the City of Los Angeles Bureau of Engineering Technical Procedure No. 15.[58] However, this would be temporary, and emergency access to the Project site and surrounding area would be required to be maintained along North Bellaire Avenue at all times. Additionally, all construction staging would occur within the Project site's boundaries and would not interfere with circulation along North Bellaire Avenue or any other nearby roadways.

As described above, primary vehicular access to the Project site would be provided via one driveway along North Bellaire Avenue. All internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. This would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as outlined in LAMC §57.118, and which are required prior to building permit issuance. The Project also does not propose any features that would inhibit emergency access to nearby areas. Further, the Project site is located in an urbanized area where adequate circulation and access are provided to facilitate emergency response. Therefore, following compliance with the regulatory framework, the Project would not result in inadequate emergency access during construction or operations. A less-than-significant impact would occur, and no mitigation is required.

**Mitigation Measures**

No mitigation is required.

[58] City of Los Angeles Bureau of Engineering. (2021). *Technical Procedures, 15 – Temporary Full Street Closure Due to Construction Activities.* Retrieved from: https://engpermitmanual.lacity.org/other-boe-permitsprocesses/technical-procedures/15-temporary-full-street-closure-due-construction

## 4.18 Tribal Cultural Resources

Information and analysis in this section is based primarily on the data provided in the following sources:

- Sacred Lands File Search ("SLF") (California Native American Heritage Commission (NAHC), February 2024); see **Appendix 4.18-1: Sacred Lands File Search Negative Letter**.
- The Project notification letters submitted by the City to Native American tribes pursuant to Assembly Bill (AB) 52 and Senate Bill (SB) 18; see **Appendix 4.18-2: Native American Tribal Consultation Correspondence**.
- The Archaeological Resources Technical Memorandum for the 7528 North Bellaire Avenue Mixed-Use Project in the City of Los Angeles, Los Angeles County, California ("Archaeological Resources Memo") (Kimley-Horn and Associates, Inc., March 2024); see **Appendix 4.5-1: Archaeological Technical Memo**.

| Environmental Issue | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **Would the Project:** | | | | |
| a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is | | | | |
| i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code §5020.1(k); or | | | | X |
| ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code §5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. | | X | | |

## Impact Analysis

*4.18ai Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code §5020.1(k); or*

**No Impact.** The Project site is currently vacant/unimproved except for one vacant single-family residential DU (circa 1938, approximately 924 SF and various accessory structures/sheds (year of construction unknown, approximately 900 SF) at the site's western portion. As discussed in **Section 4.5: Cultural Resources** and **Appendix 4.5-1: Cultural Resources Assessment**, the Project site does not contain any features meeting the historic resources criteria and does not meet the definition of a historic resource under CEQA. Project implementation would not result in any substantial adverse change in a tribal cultural resource defined under PRC §5020.1(k). No impact would occur.

*4.18aii Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code §5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?*

**Less Than Significant Impact With Mitigation Incorporated.** Chapter 532 Statutes of 2014 (AB 52) requires that lead agencies evaluate a project's potential impact on "tribal cultural resources," which include "[s]ites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are eligible for inclusion in the California Register of Historical Resources or included in a local register of historical resources." AB 52 also gives lead agencies the discretion to determine, based on substantial evidence, whether a resource qualifies as a "tribal cultural resource."

In compliance with PRC §21080.3.1(b), the City provided formal notification to California Native American tribal representatives identified by the California NAHC. Native American groups may know the area's cultural resources and may have concerns about a development's adverse effects on tribal cultural resources, as defined in PRC §21074. The City has contacted the tribal representatives noted below.

- **Fernandeño Tataviam Band of Mission Indians,** Sarah Brunzell
- **Gabrieleno Band of Mission Indians - Kizh Nation,** Andrew Salas
- **Gabrieleno Band of Mission Indians - Kizh Nation,** Christina Swindall Martinez
- **Gabrieleno/Tongva San Gabriel Band of Mission Indians,** Anthony Morales
- **Gabrieleno/Tongva Nation,** Sandonne Goad
- **Gabrieleno Tongva Indians of California Tribal Council,** Robert Dorame

- **Gabrieleno Tongva Indians of California Tribal Council,** Christina Conley
- **Gabrieleno-Tongva Tribe,** Sam Dunlap
- **Gabrieleno-Tongva Tribe,** Charles Alvarez
- **San Fernando Band of Mission Indians,** Donna Yocum
- **Santa Rosa Band of Cahuilla Indians,** Lovina Redner
- **Soboba Band of Luiseno Indians,** Joseph Ontiveros
- **Soboba Band of Luiseno Indians,** Jessica Valdez

Correspondence to and from tribal representatives is included in Appendix 4.18-2. As of the release date of this IS/MND, the City has received two requests for consultation. Based on the results of tribal consultation, the Project would implement MM TCR-1 through MM TCR-3, provided below, regarding the discovery and handling of any potential resources. Therefore, with mitigation incorporated, impacts concerning tribal cultural resources would be less than significant.

### Mitigation Measures

**MM TCR-1** **Gabrieleño Band of Mission Indians – Kizh Nation Monitor Retention.** The project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description and/or definition and/or required in connection with the project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavating, drilling, and trenching.

A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity or the issuance of any permit necessary to commence a ground-disturbing activity.

The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to Native American cultural and historical artifacts, remains, places of significance, etc. (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe.

On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the project applicant/lead

agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs.

Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural, and/or historic purposes.

**MM TCR-2** **Fernandeño Tataviam Band of Mission Indians Monitor Retention.** The project applicant shall retain a professional Tribal Monitor procured by the Fernandeño Tataviam Band of Mission Indians to observe all ground-disturbing activities including, but not limited to, clearing, grubbing, grading, excavating, digging, trenching, plowing, drilling, tunneling, quarrying, leveling, driving posts, auguring, blasting, stripping topsoil or similar activity. Tribal Monitoring Services will continue until confirmation is received from the project applicant, in writing, that all scheduled activities pertaining to Tribal Monitoring are complete. If the Project's scheduled activities require the Tribal Monitor to leave the Project for a period of time and return, confirmation shall be submitted to the Tribe by Client, in writing, upon completion of each set of scheduled activities and 5 days' notice (if possible) shall be submitted to the Tribe by project applicant, in writing, prior to the start of each set of scheduled activities. If cultural resources are encountered, the Tribal Monitor will have the authority to request that ground-disturbing activities cease within 60 feet of discovery, and a qualified archaeologist meeting Secretary of the Interior standards, retained by the project applicant, as well as the Tribal Monitor, shall assess the find. The Lead Agency and/or applicant shall, in good faith, consult with the FTBMI on the disposition and treatment of any Tribal Cultural Resource encountered during all ground disturbing activities.

**MM TCR-3** **Inadvertent Discovery of Human Remains.** If human remains or funerary objects are encountered during any activities associated with the Project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5, and that code shall be enforced for the duration of the Project. Inadvertent discoveries of human remains and/or funerary object(s) are subject to California State Health and Safety Code Section 7050.5, and the subsequent disposition of those discoveries shall be decided by the Most Likely Descendant (MLD), as determined by the Native American Heritage Commission (NAHC), should those findings be determined as Native American in origin. Human remains and grave/burial goods shall be treated alike per California Public Resources Code §5097.98(d)(1) and (2). Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

## 4.19 Utilities and Service Systems

| Environmental Issue | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **Would the Project:** | | | | |
| a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? | | X | | |
| b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? | | | X | |
| 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 projected demand in addition to the provider's existing commitments? | | | X | |
| 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? | | | X | |
| e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste? | | | X | |

The basis for the following information and analysis is the Wastewater Civil Technical Memorandum (Kimley-Horn, June 2024) and the Water Civil Technical Memorandum (Kimley-Horn, June 2024). These reports are included as **Appendix 4.19-1: Wastewater Civil Technical Memorandum** and **Appendix 4.19-2: Water Civil Technical Memorandum** and summarized below.

### Impact Analysis

*4.19ai Would the Project require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects?*

**Less Than Significant With Mitigation Incorporated.** Water demand for the Project's construction would be required for dust control, cleaning of equipment, excavation/export, removal, and re-compaction, etc.

During construction, the contractor would bring their own portable bathroom and wash stations, which would have their self-contained water source and wastewater storage. These facilities would not connect to the adjacent sewer or water infrastructure for those uses. The temporary water usage is far less than the proposed water demand and therefore poses no significant impact.

LADWP would supply water to the Project site via the existing eight-inch water main that runs underneath Bellaire Avenue.[59] The Project would connect a domestic water line, a fire line, and an irrigation line to the existing water main within the Bellaire Avenue right-of-way. The existing water main within Bellaire Avenue would not need to be upsized to accommodate the Project. The Project would be subject to all pertinent local, regional, and State-level regulations concerning any new connections, laterals, or trenching. As such, the Project would require the construction of new onsite water facilities, as well as limited connections to existing offsite/adjacent infrastructure; however, these improvements would be limited to connections to existing facilities near the Project site, thus their construction would not cause significant environmental effects.

Further, the environmental effects associated with the construction of the proposed water facility improvements are discussed as part of the overall environmental analyses in **Sections 4.1** through **4.21**. As concluded in these sections, the Project's environmental effects would be less than significant through compliance with the established regulatory framework and with mitigation incorporated (i.e., MM CUL-1, MM GEO-1, and MM TCR-1 through MM TCR-3). Therefore, with mitigation incorporated, the Project would result in less than significant environmental effects associated with the construction of the proposed water facilities.

*4.19aii Would the Project require or result in the relocation or construction of new or expanded wastewater conveyance facilities, the construction or relocation of which could cause significant environmental effects?*

**Less Than Significant With Mitigation Incorporated.** The Project's estimated wastewater generation would be approximately 7,611 gallons per day (gpd); see **Table 4.19-1: Estimated Project Wastewater Generation.**

**Table 4.19-1: Estimated Project Wastewater Generation**

| Land Use | Units | Wastewater Generation Rate (gpd)[1] | Total Wastewater Generation (gpd) |
|---|---|---|---|
| Residential (1-BR) | 8 | 110/DU | 880 |
| Office | 692 SF | 120 gal/1,000 SF | 83 |
| Self-Storage | 217,135 SF | 30/1,000 SF | 6,514 |
| Parking Area | 6,700 SF | 20 gal/1,000 SF | 134 |
| ***Total Proposed Project Wastewater Demand*** | | | ***7,611*** |
| ***Total Existing[2]*** | | | ***0*** |
| ***Net Project*** | | | ***7,611 (0.008 mgd)[3]*** |

Note:
[1] Wastewater generation rates are based on the City of Los Angeles Sewer Generation Rates. Refer to Appendix 3 of **Appendix 4.19-1** for City of Los Angeles Sewer Generation Rates.
[2] The existing Project site was assumed to generate no wastewater since the site is currently vacant and largely undeveloped.
[3] mgd = million gallons per day

[59] See **Appendix 4.19-2**, Figure 2: Water Substructure Map.

The sewer infrastructure in the Project's vicinity includes an existing 10-inch line in Bellaire Avenue. The sewage from the existing 10-inch line feeds into a 15-inch line on Whitsett Avenue, then into an 18-inch line before discharging into a 21-inch line on Whitsett Avenue. Based on the Request for Wastewater Services Information service request letter received from the Bureau of Sanitation, the sewer lines serving the Project Site may be able to accommodate the proposed Project. Through the rules and regulations established in the City of Los Angeles Sewer Allocation Ordinance (Ord. 166,060), the Bureau of Sanitation (BOS) will re-verify the gauging of the sewer lines and make the appropriate decisions if additional connections to the local sewer lines are required at the time of construction. If it is later determined that the local sewer system has insufficient capacity to serve the Project, the Applicant would be required to replace or build new sewer lines to a point in the sewer system with sufficient capacity to accommodate the Project's increased flows. Any infrastructure improvements to update or expand the sewer lines in the Project vicinity, if necessary, would be limited to trenching, excavating, and backfilling the sewer lines beneath the public right-of-way. Such construction activities would be localized in nature and would generally involve partial lane closures for a relatively short duration of time, typically lasting a few days to a few weeks.

The Project would be subject to compliance with all pertinent local, regional, and State-level regulations concerning new connections, laterals, or trenching. The California Health and Safety Code (HSC) empowers the City of Los Angeles to charge a fee for the privilege of connecting to the City's sewage system for increasing the strength or quantity of wastewater discharged from connected facilities. The City may require payment of a connection fee before the Project is permitted to discharge to the City's sewerage system.

The Project would require the construction of new onsite wastewater conveyance facilities (i.e., pipes), as well as limited connections to existing offsite/adjacent infrastructure. Although the Project would require relocation or construction of new onsite wastewater conveyance facilities, these improvements would be limited to connections to existing facilities near the Project site; thus, their construction or relocation would not cause significant environmental effects. Further, the environmental effects associated with the construction of the proposed wastewater improvements are discussed as part of the overall environmental analyses in **Sections 4.1** through **4.21**. As concluded in these sections, the Project's environmental effects would be reduced to less than significant through compliance with the established regulatory framework and with mitigation incorporated (i.e., MM CUL-1, MM GEO-1, and MM TCR-1 through MM TCR-3). Therefore, with mitigation incorporated, the Project would result in less than significant environmental effects associated with the proposed wastewater facilities' construction.

*4.19aiii Would the Project require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects?*

*4.19c Would the Project result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project projected demand in addition to the provider's existing commitments?*

**Less Than Significant Impact.** As discussed above, the Project's estimated wastewater generation would be approximately 7,611 gpd over existing conditions; see **Table 4.19-1**. The Project's wastewater flow would be conveyed to the HWRP for treatment. The HWRP currently processes an average daily flow of

272 million gpd (mgd) and has a total permitted/design capacity of 450 mgd.[60] The Project's estimated wastewater generation of 7,611 gpd (0.008 mgd) comprises less than one percent of HWRP's remaining available capacity of 178 mgd.[61] Further, the City has confirmed that HWRP has sufficient capacity to serve the Project; see **Appendix 4.19-1**. As such, sufficient capacity exists at HWRP to serve the Project, and no HWRP expansion/modification would be required to accommodate the Project. Therefore, the HWRP has adequate capacity to serve the Project's estimated wastewater treatment demand in addition to the provider's existing commitments. Additionally, the Project would not require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects. A less-than-significant impact would occur, and no mitigation is required.

*4.19aiv Would the Project require or result in the relocation or construction of new or expanded stormwater drainage facilities, the construction or relocation of which could cause significant environmental effects?*

**Less Than Significant With Mitigation Incorporated.** The Project's proposed improvements include storm drain pipes to convey runoff in a southwesterly direction to a subsurface infiltration facility. Runoff from the site would be conveyed via ribbon gutters to the proposed infiltration facility, which would draw down via infiltration into the underlying soil. The required volume to capture and infiltrate the entire 25-year storm was found to be 5,612 cubic feet (cf). The proposed infiltration facility would provide 5,756 cf, including 4,510 cf within subsurface gravel and chamber system as well as 1,246 cf in 0.5 feet of surface ponding across the top of the turn open space area located above the system. Therefore, the proposed stormwater system has been designed to retain and infiltrate all runoff generated by events up to the 25-year storm. No runoff would be discharged from the site for storm events of equal or lesser intensity than the 25-year storm. The site's surface grading has been designed to allow runoff produced by higher-intensity storms to surface flow to the Project frontage along Bellaire Avenue without impacting the structures or improvements. The Project's proposed drainage patterns are further discussed in **Section 4.10: Hydrology and Water Quality**.

The Project would require the construction of new onsite stormwater facilities, as well as limited connections to existing offsite/adjacent infrastructure. Any new connections, laterals, or trenching required as part of Project construction would be subject to compliance with the City of Los Angeles Department of Public Works and Los Angeles Sanitation requirements. The Project would also be subject to compliance with LAMC Article 4.4: Stormwater and Urban Runoff Pollution Control. Although the Project would require relocation or construction of new stormwater facilities, these improvements would be limited to connections to existing facilities near the Project site; thus, their construction or relocation would not cause significant environmental effects. Further, the environmental effects associated with the proposed stormwater facility improvement construction are discussed as part of the overall environmental analyses in **Sections 4.1** through **4.21**. As concluded in these sections, the Project's environmental effects would be reduced to less than significant through compliance with the established regulatory framework and with mitigation incorporated (i.e., MM CUL-1, MM GEO-1, and MM TCR-1 through MM TCR-3). Therefore, with mitigation incorporated, the Project would result in less than

[60] Los Angeles Department of Water and Power. *Hyperion Water Reclamation Plant – Hyperion 2035 Program.* Available at: https://www.ladwp.com/sites/default/files/documents/LASAN_Hyperion_2035_Program_Fact_Sheet.pdf

[61] (Total Permitted Capacity) – (Average Wastewater Flow) = Remaining Available Capacity; 450-272=178

significant environmental effects associated with the proposed stormwater drainage facilities' construction.

*4.19aiv Would the Project require or result in the relocation or construction of new or expanded electric power, natural gas, and telecommunications facilities, the construction or relocation of which could cause significant environmental effects?*

**Less Than Significant With Mitigation Incorporated.**

Electric Power. As shown in **Table 4.6-3: Project Annual Energy Use During Operations**, the Project's estimated electric power demand totals approximately 1.29 GWh per year (approximately 1,288,333 kWh per year).

The Project would require construction of new onsite electric power facilities, as well as limited connections to existing offsite/adjacent infrastructure. As such, the Project would result in the construction of electric power facilities, which could cause significant environmental effects.

Natural Gas Facilities. The Project would not use natural gas; therefore, no impact would occur concerning the construction of natural gas facilities, which could cause significant environmental effects.

Telecommunication Facilities. Various companies provide telecommunications, including AT&T and Spectrum. The Project proposes to connect to the existing telecommunication infrastructure at the Project site. The Project would require the construction of new onsite telecommunication facilities, as well as limited connections to existing offsite/adjacent infrastructure. As such, the Project would result in the construction of telecommunication facilities, which could cause significant environmental effects.

Conclusion. Although the Project would require relocation or construction of new electric power and telecommunication facilities, these improvements would be limited to connections to existing facilities near the Project site; thus, their construction or relocation would not cause significant environmental effects. Further, the environmental effects associated with the construction of the proposed electrical power and telecommunication facility improvements are discussed as part of the overall environmental analyses in **Sections 4.1** through **4.21**. As concluded in these sections, the Project's environmental effects would be reduced to less than significant through compliance with the established regulatory framework and with mitigation incorporated. Therefore, with mitigation incorporated, the Project would result in less than significant environmental effects associated with the construction of the proposed electric power and telecommunication facilities.

*4.19b Would the Project have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years?*

**Less Than Significant Impact.** The Urban Water Management Planning Act requires every urban water supplier providing water for municipal purposes to more than 3,000 customers or supplying more than 3,000 acre-feet (AF) of water annually to prepare, adopt, and file an Urban Water Management Plan (UWMP) with the California Department of Water Resources every five years in the years ending in zero and five. The UWMP was prepared in compliance with Urban Water Management Planning Act requirements. The LADWP's 2020 UWMP provides water supply planning for a 25-year planning period in five-year increments and identifies water supplies needed to meet existing and future demands. The demand analysis must identify supply reliability under three hydrologic conditions: a normal year; a single-dry year; and multiple-dry years.

The basis for the UWMP's water demand forecasting method is a combination of population forecasts for residential uses and General plan land use designations for non-residential land uses. SCAG has developed growth forecasts for cities and counties, which it bases on General Plans; see Response 4.14a. In turn, the City uses SCAG's growth projections to forecast residential water demands in the UWMP. Because the Project site is designated Low Residential (4-12 DU/AC), Commercial Manufacturing, and Parking Buffer, the UWMP's forecast water demands assume residential and commercial land uses for the Project site and therefore are already accounted for. The Project's water demand, which is presented in **Table 4.19-2: Estimated Project Water Demand**, conservatively does not take credit for the water demands assumed for the Project site in the UWMP.

The Project's water demand, which assumes indoor water conservation measures (e.g., low flow rate plumbing fixtures), and outdoor conservation measures (e.g., drought-tolerant landscaping) would total approximately 10.48 AFY; see **Table 4.19-2: Estimated Project Water Demand**.

**Table 4.19-2: Estimated Project Water Demand**

| Land Use | Units | Generation Rate (gpd)[1,2] | Total Estimated Water Demand (gpd) |
|---|---|---|---|
| **Proposed Project** | | | |
| Residential | 8 DU – (1-BR) | 110 gpd/unit | 880 |
| Office | 692 SF | 120 gal/1,000 SF | 86 |
| Self-Storage | 217,135 SF | 30/1,000 SF | |
| Parking Lot | 6,700 SF | 20 gal/1,000 SF | 134 |
| | | ***Total Project*** | ***7,611 (8.52 AFY)*** |
| | | ***Total Estimated Proposed Irrigation Use[3]*** | ***+1,559 (1.74 AFY)*** |
| | | ***Total Estimated Proposed Water Use with Irrigation[3]*** | ***9,170 (10.27 AFY)*** |

Note:
[1] Estimated water usage is estimated as being equivalent to the estimated sewage generation for the Project. These rates are assessed using City of LA's Sewage Generation Factor Chart.
[2] See **Appendix 6.19-2.**
[3] A 20% factor is included to account for landscape and irrigation needs for the Project.

The 2020 UWMP concludes that there is sufficient water supply through 2045, up to 746,000 AFY.[62] The increase in water demand from Project implementation (10.27 AFY) would account for less than one percent of the expected total demand in 2045. Moreover, the Project's water demand does not take credit for the water demands assumed for the Project site in the UWMP. Therefore, the Project would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. Impacts would be less than significant, and no mitigation is required.

*4.19d Would the Project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*

[62] Los Angeles Department of Water and Power. (2020). 2020 Urban Water Management Plan for the Los Angeles Department of Water and Power. Available at: https://www.ladwp.com/sites/default/files/documents/LADWP_2020_UWMP_Web.pdf

### *4.19e Would the Project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

**Less Than Significant Impact**. The City of Los Angeles Bureau of Sanitation and private waste haulers are responsible for the collection and hauling of solid waste within the City. Generally, the Bureau of Sanitation provides waste collection services for single-family and some smaller multi-family developments, while private haulers provide waste collection services for most multi-family residential and commercial developments. Waste in the City is disposed of at several landfills, including Sunshine Canyon Landfill and Chiquita Canyon Landfill. Sunshine Canyon Landfill has a remaining permitted capacity of 140.9 million tons and a maximum daily capacity of 12,100 tons per day.[63] The landfill currently accepts approximately 8,039 tons per day, meaning it has a remaining daily capacity of 4,061 tons per day.[64]

The City's Construction and Demolition (C&D) Waste Recycling Ordinance (File 09-3029) requires that all mixed C&D waste generated within City limits be taken to a City-certified C&D waste processor.[65] LA Sanitation (LASAN) is responsible for the C&D waste recycling policy. As such, the Project's C&D waste would be subject to compliance with these requirements.

CalRecycle provides multi-family residential and commercial solid waste generation rates. Based on eight DU and 5.1 lbs./DU/day, the Project's residential component would generate approximately 40.8 lbs./day or 0.02 tons/day. Based on 217,827 SF of commercial uses and 5 lbs./1,000 SF/day, the Project's self-storage and office component would generate approximately 1,089 lbs./day or 0.54 tons/day. In total, the Project would generate approximately 0.56 tons of solid waste per day, which would account for less than one percent of the overall daily capacity of the Sunshine Canyon Landfill.

State laws require the City to recycle paper, cardboard, plastic, glass, aluminum, food waste, and green waste. All residential uses, including multi-family residential (i.e., apartments, townhomes, homeowner associations, etc.) and all commercial uses (public and private) are required to comply. As such, the Project would comply with the State and City recycling programs to reduce the volume of the Project's solid waste that is disposed of at landfills. Existing landfills have sufficient capacity to serve the proposed Project, and solid waste generated during construction and operations would represent a nominal increase compared to the landfills daily permitted tonnages. Operational activities would be subject to compliance with all applicable federal, state, and local statutes and regulations for solid waste, including those identified under CALGreen and AB 939.

The Project would not generate solid waste in excess of state or local standards, in excess of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Therefore, the Project would result in less than significant impacts concerning solid waste, and no mitigation is required.

**Mitigation Measures**

See **Section 4.5: Cultural Resources**, **Section 4.7: Geology and Soils**, and **Section 4.18: Tribal Cultural Resources**.

[63] CalRecycle. (2024). SWIS Facility/Site Inspections – Sunshine Canyon City/County Landfill. Available at: https://www2.calrecycle.ca.gov/SolidWaste/SiteInspection/Index/4702

[64] South Coast Air Quality Management District. (2019). Sunshine Canyon Landfill. Available at: https://www.aqmd.gov/home/news-events/community-investigations/sunshine-canyon-landfill

[65] City of Los Angeles

## 4.20 Wildfire

| Environmental Issue | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:** | | | | |
| a) Substantially impair an adopted emergency response plan or emergency evacuation plan? | | | | X |
| b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? | | | | X |
| c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? | | | | X |
| 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? | | | | X |

**Impact Analysis**

*4.20a Would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?*

*4.20b Would the Project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*

*4.20c Would the Project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?*

*4.20d Would the Project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

**No Impact.** As stated above in Response 4.9g, the Project site is in a highly urbanized area and is not classified as VHFHSZ. The Project is a mixed-use (commercial and residential) development that would tie into existing infrastructure and would not require the installation or maintenance of associated infrastructure (e.g., roads, fuel breaks, emergency water sources, power lines, or other utilities). The Project site and surrounding vicinity are relatively flat. There are no known landslides near the site nor is the site in the path of any known or potential landslides. Therefore, the Project would result in no impact concerning wildfire.

**Mitigation Measures**

No mitigation is required.

## 4.21 Mandatory Findings of Significance

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

### Impact Analysis

*4.21a Does the Project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?*

**Less Than Significant With Mitigation Incorporated.** As discussed throughout this Initial Study, the Project does not have the potential to degrade the environment's quality or result in significant environmental impacts that cannot be reduced to less than significant following compliance with the established regulatory framework (i.e., local, State, and federal regulations) and with mitigation incorporated.

As concluded in **Section 4.4: Biological Resources**, the Project would not have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, or threaten to eliminate a plant or animal community, or substantially reduce the number or restrict the range of a rare or endangered plant or animal.

As concluded in **Section 4.5: Cultural Resources**, with the incorporation of MM CUL-1, which requires an additional pedestrian survey, and COA CUL-1, which addresses the inadvertent discovery of archaeological resources, the Project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines §15064.5. As concluded in **Section 4.7: Geology and Soils**, with MM GEO-1, which addresses the inadvertent discovery of paleontological resources, the Project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. As concluded in **Section 4.18: Tribal Cultural Resources**, with MM TCR-1 through MM TCR-3, which addresses the inadvertent discovery of tribal cultural resources, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource.

Therefore, with implementation of mitigation, the Project would not have the potential to eliminate important examples of the major periods of California history or prehistory. Impacts are less than significant with mitigation incorporated.

*4.21b Does the Project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of the past projects, the effects of other current projects, and the effects of probable future projects.)*

**Less Than Significant Impact.** State CEQA Guidelines §15065(a)(3) defines “cumulatively considerable as times when “the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.” The proposed Project would result in significant impacts unless mitigated for the following environmental resource areas: cultural resources, geology and soils, and tribal cultural resources. The impacts associated with these resource areas are localized and thus would not result in cumulative impacts. The Project will incorporate mitigation measures for each of these environmental resource areas to reduce impacts to less than significant.

Concerning the other environmental resource areas, the Project was determined either to have no impact or to have less than significant impacts following compliance with the established regulatory framework, without the need for mitigation. Cumulatively, the proposed Project would not result in any significant impacts that would substantially combine with impacts of other current or probable future impacts. Therefore, the proposed Project would not result in any cumulatively considerable significant impacts.

*4.21c Does the Project have environmental effects which will cause substantial adverse effects on human beings, directly or indirectly?*

**Less Than Significant Impact With Mitigation Incorporated.** Previous sections of this Initial Study reviewed the Project’s potential impacts on human beings related to various environmental resource areas. As determined throughout this Initial Study, the proposed Project would not result in any potentially significant impacts that cannot be mitigated or reduced with the incorporation of mitigation measures. The Project would not cause a substantial adverse effect on human beings, either directly or indirectly. Impacts would be less than significant with mitigation incorporated.

**Mitigation Measures**

See **Section 4.5: Cultural Resources**, **Section 4.7: Geology and Soils**, and **Section 4.18: Tribal Cultural Resources**.

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