DEPARTMENT OF CITY PLANNING

RECOMMENDATION REPORT

City Planning Commission

Date: **October 9, 2025**
Time: After 8:30 a.m.
Place: Los Angeles City Hall
Council Chambers
200 North Spring Street, Room 340
Los Angeles, CA 90012

This meeting may be available virtually, in a hybrid format. Please check the meeting agenda approximately 72 hours before the meeting for additional information at: https://planning.lacity.org/about/commissions-boards-hearings and/or by contacting cpc@lacity.org

Public Hearing: September 3, 2025

Appeal Status: General Plan Amendment is not appealable. Height District Change is appealable to City Council by applicant, if denied. Conditional Use, Zoning Administrator's Adjustment, and Site Plan Review are appealable to City Council.
Expiration Date: October 27, 2025
Multiple Approval: Yes

Case No.:	CPC-2024-115-GPA-ZC-HD-CU-ZAA-SPR[1]
CEQA No.:	ENV-2024-116-MND
Incidental Cases:	N/A
Related Cases:	N/A
Council No.:	11 – Park
Plan Area:	Palms – Mar Vista – Del Rey
Plan Overlay:	Los Angeles Coastal Transportation Corridor
Certified NC:	Del Rey
GPLU:	Light Manufacturing
Previous Zone:	M2-1
Applicant:	Cherry Miao, Public Storage & Delivery
Representative:	Francis Park, Park & Velayos LLP

PROJECT LOCATION: **12681 West Jefferson Boulevard**
(legally described as Lot FR 28, Block None, Tract 30549)

PROPOSED PROJECT: The construction, use, and maintenance of an 82,324 square-foot, 44-foot-3-inch-tall, three-story mixed-use building over a basement consisting of retail and self-storage uses. The proposed project will consist of 3,959 square feet of retail use and parking at ground floor and 78,365 square feet of self-storage use at the second and third floors and basement level. The proposed project will provide 70 automobile parking spaces and 64 bicycle parking spaces. The proposed project will require approximately 13,541 cubic yards of grading and export. The proposed project will be developed at the vacant portion of a site that is currently developed with an existing 216,584 square-foot, 57-foot-6-inch-tall, four-story self-storage building that will remain. There are nine (9) street trees that will remain and one (1) additional street tree that was removed previously by the City due to its poor condition.

[1] The case was filed on January 5, 2024, prior to the effective date of the New Zoning Code (Chapter 1A - Process and Procedures). Therefore, the case is vested and subject to the Original Zoning Code.

REQUESTED ACTIONS:

1. Pursuant to CEQA Guidelines Section 15074(b), consideration of the whole of the administrative record, including the Mitigated Negative Declaration, No. ENV-2024-116-MND ("Mitigated Negative Declaration"), all comments received, the imposition of mitigation measures and the Mitigation Monitoring Program prepared for the Mitigated Negative Declaration;

2. Pursuant to City Charter Section 555 and Los Angeles Municipal Code ("LAMC") Section 11.5.6, a General Plan Amendment to the Palms – Mar Vista – Del Rey Community Plan to amend Footnote No. 1 of the Community Plan Map to allow Height District No. 2 for the project site;

3. Pursuant to LAMC Section 12.32, a Height District Change from Height District No. 1 to 2 to allow the proposed project to be developed with a Floor Area Ratio of 2.1:1 and approximately 298,908 square feet of floor area;

4. Pursuant to LAMC Section 12.24 W.50, a Conditional Use Permit to allow a storage building for household goods in the M2 Zone within 500 feet from an R Zone and residential uses;

5. Pursuant to LAMC Section 12.28, a Zoning Administrator's Adjustment to allow a building height of 44 feet 3 inches in lieu of the maximum building height of 37 feet for storage buildings for household goods allowed by LAMC Section 12.17.6 A.10; and,

6. Pursuant to LAMC Section 16.05, a Site Plan Review to allow a development project that is creating 50,000 gross square feet or more of nonresidential floor area.

RECOMMENDED ACTIONS:

1. **Find**, pursuant to CEQA Guidelines Section 15074(b), after consideration of the whole of the administrative record, including the Mitigated Negative Declaration, No. ENV-2024-116-MND ("Mitigated Negative Declaration"), and all comments received, with the imposition of mitigation measures, there is no substantial evidence that the project will have a significant effect on the environment; **Find** the Mitigated Negative Declaration reflects the independent judgment and analysis of the City; **Find** the mitigation measures have been made enforceable conditions on the project; and **Adopt** the Mitigated Negative Declaration and the Mitigation Monitoring Program prepared for the Mitigated Negative Declaration;

2. **Approve** and **Recommend**, pursuant to City Charter Section 555 and Los Angeles Municipal Code ("LAMC") Section 11.5.6, a **General Plan Amendment** to the Palms – Mar Vista – Del Rey Community Plan to amend Footnote No. 1 of the Community Plan Map to allow Height District No. 2 for the project site;

3. **Approve** and **Recommend**, that the City Council adopt pursuant to LAMC Section 12.32, adopt an ordinance for a **Height District Change** from Height District No. 1 to 2 to allow the proposed project to be developed with a Floor Area Ratio of 2.1:1 and approximately 298,908 square feet of floor area;

4. **Approve**, pursuant to LAMC Section 12.24 W.50, a Conditional Use Permit to allow a storage building for household goods in the M2 Zone within 500 feet from an R Zone and residential uses;

5. **Approve**, pursuant to LAMC Section 12.28, a Zoning Administrator's Adjustment to allow a building height of 44 feet 3 inches in lieu of the maximum building height of 37 feet for storage buildings for household goods allowed by LAMC Section 12.17.6 A.10;

6. **Approve,** pursuant to LAMC Section 16.05, a Site Plan Review to allow a development project that is creating 50,000 gross square feet or more of nonresidential floor area;

7. **Adopt** the attached Conditions of Approval; and

8. **Adopt** the attached Findings.

VINCENT P. BERTONI, AICP
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ADVICE TO PUBLIC: *The exact time this report will be considered during the meeting is uncertain since there may be several other items on the agenda. Written communications may be mailed to the *Commission Secretariat, Room 273, City Hall, 200 North Spring Street, Los Angeles, CA 90012* (Phone No. 213-978-1300). While all written communications are given to the Commission for consideration, the initial packets are sent to the week prior to the Commission's meeting date. If you challenge these agenda items in court, you may be limited to raising only those issues you or someone else raised at the public hearing agendized herein, or in written correspondence on these matters delivered to this agency at or prior to the public hearing. As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability, and upon request, will provide reasonable accommodation to ensure equal access to these programs, services and activities. Sign language interpreters, assistive listening devices, or other auxiliary aids and/or other services may be provided upon request. To ensure availability of services, please make your request not later than three working days (72 hours) prior to the meeting by calling the Commission Secretariat at (213) 978-1300.

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PROJECT ANALYSIS

PROJECT SUMMARY

The proposed project is for the expansion of an existing self-storage use on a property owned and operated by Public Storage. The proposed project involves the construction, use, and maintenance of an 82,324 square-foot, 44-foot-3-inch-tall, three-story mixed-use building over a basement consisting of ground floor retail and self-storage uses on a 143,393 square-foot lot. The project site is currently developed with a 216,584 square-foot, 57-foot-6-inch-tall, four-story self-storage building that will remain and surface parking lot that will partially remain. The proposed project will require approximately 13,541 cubic yards of grading and export. There are nine (9) street trees that will remain and one (1) additional street tree that was removed previously by the City due to its poor condition. A rendering of the proposed project is shown in **Figure 1** and an aerial image of the project site and proposed development area is shown in **Figure 2**.



Figure 1. Rendering of the proposed project looking southwest.

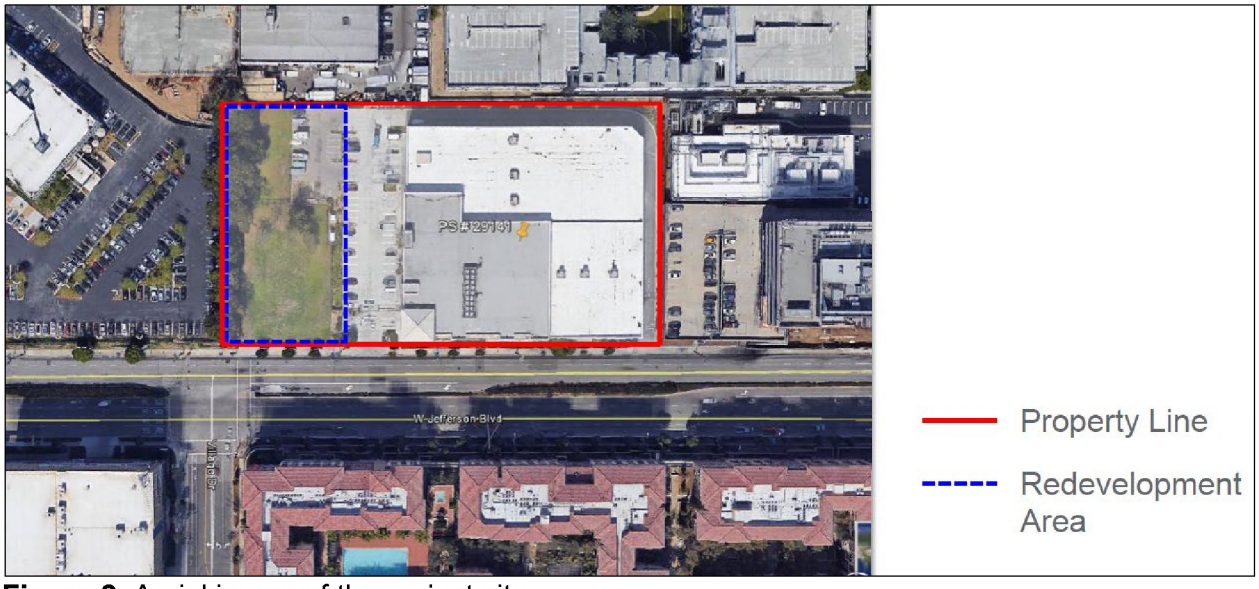

Figure 2. Aerial image of the project site.

PROJECT DESCRIPTION

The proposed project consists of the construction of an 82,324 square-foot, 44-foot-3-inch-tall, three-story mixed-use building, consisting of ground floor retail and self-storage uses, will be developed at the vacant western portion of the property. The existing 216,584 square-foot, 57-foot-6-inch-tall, four-story self-storage building will remain at the eastern portion of the property. Upon completion, the combined floor area of the existing and proposed buildings on the project site will be approximately 298,908 square feet. The proposed project will retain 18 automobile parking spaces from the existing surface parking lot and add 52 automobile parking spaces at the ground floor of the proposed building. **Table 1** provides a summary of the project details.

Table 1: Project Details.

Project Details	Proposed Building	Existing Building (To Remain)	Combined Buildings
Square Footage	82,324 SF	216,584 SF	298,908 SF
Height	44 feet 3 inches	57 feet 6 inches	N/A
Use(s)	Retail, Self-Storage	Self-Storage	N/A
Automobile Parking	52	18	70
Bicycle Parking	64	N/A	62

The proposed project will consist of 77,403 square feet of self-storage uses at the basement level and second and third floors and 3,959 square feet of retail uses at the ground floor. The ground floor retail uses will be comprised of two tenant spaces. The ground floor will also feature a 769 square-foot loading lobby, above-grade parking lot, and enclosed storage area for the long-term bicycle parking spaces along with stairways and elevators. The basement level, second floor, and third floor will feature the self-storage units along with stairways and elevators. The short-term bicycle parking spaces will be provided along the property frontage along Jefferson Boulevard. There are nine (9) street trees that will remain and one (1) additional street tree that was removed previously by the City due to its poor condition.

The proposed project features modern architectural design components and includes site improvements, landscaping, and street improvements. The proposed structure will be crafted with a mix of different materials that include vertical breaks, popouts, and accent colors. It will also feature a mix of clear and spandrel glass at all three levels that offers a high degree of transparency to the interior. The ground floor retail spaces, entrance plaza, and landscaping at the front of the proposed structure combine to create an active frontage along Jefferson Boulevard. Also at the ground level, the loading lobby with two elevators will be provided at the center of proposed structure for convenient access to the storage units in the basement and on the upper floors. See **Figure 3** for a rendering of the property frontage.



Figure 3. Rendering of the Jefferson Boulevard frontage.

Parking, Access, and Site Circulation

Pedestrian access to the proposed project will be provided from the sidewalk to stairways up to an entrance plaza for the retail spaces. Vehicular access to the proposed project will be provided via the existing driveway, which will be reconstructed to current standards, at the western portion of the project site. There is an existing fire access lane along the easterly property line that will be fully extended along the rear property line to serve the proposed project. Other site improvements include the removal of some of the existing curb and parking spaces, removal of the existing fences gates, relocation of the existing electrical switchgear and transformer, installation of new fences and gates, and installation of new landscaping. The public right-of-way improvements include the reconstruction of an access ramp to current ADA standards and 8- to 12-foot-wide sidewalk along the entire property line. See **Figure 4** for the Site Plan showing parking, access, and site circulation details.

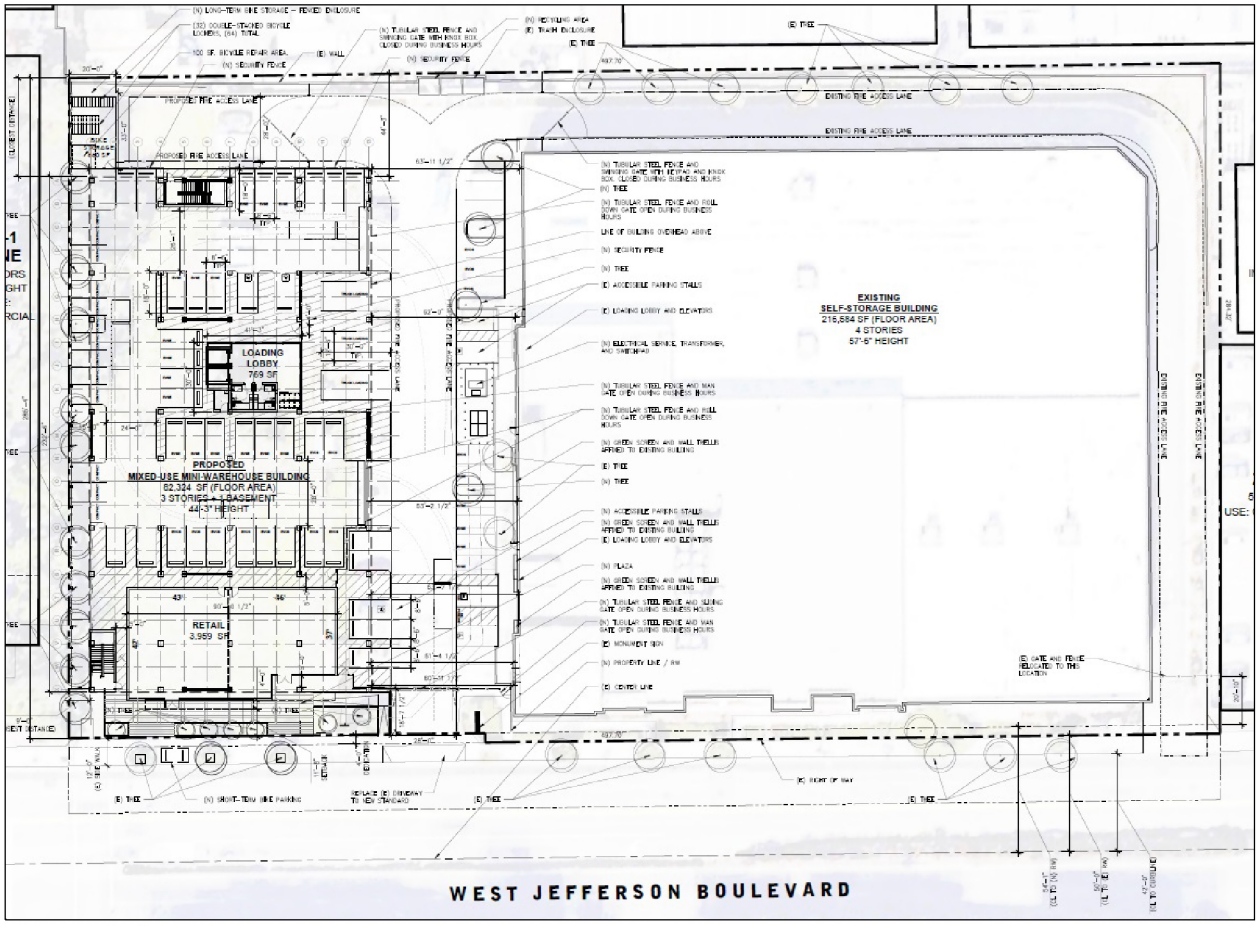

Figure 4. Site Plan.

Sustainability

The proposed project will be required to comply with the applicable provisions of the Los Angeles Green Building Code and California Green Building Standards Code. In compliance with Green Building Code requirements, solar panels will be installed on the rooftop (approximately 13,908 square feet of the total roof area will have solar panels) and Electric Vehicle (EV) parking will be provided. The proposed project will be utilizing AB 2097 to provide a reduced number of parking spaces; 70 automobile parking spaces will be voluntarily provided in lieu of the otherwise required 93 automobile parking spaces. According to a Tree Report prepared by The Tree Resource on April 21, 2025, and reviewed and stamped by the Urban Forestry Division on May 12, 2025, there

are no Protected Trees on the project site or public right-of-way. However, there are two (2) Non-Protected Significant Trees on the project site proposed for removal as part of the project. The proposed project will provide 21 new trees on-site and will maintain 10 existing trees, resulting in a total of 31 on-site trees. There are also nine (9) street trees in the public right-of-way, all of which will be retained and protected in place. One (1) additional street tree was removed previously by the City due to its poor condition. Additionally, the proposed project will install green screens and wall trellises along portions of the westerly side of the existing self-storage building.

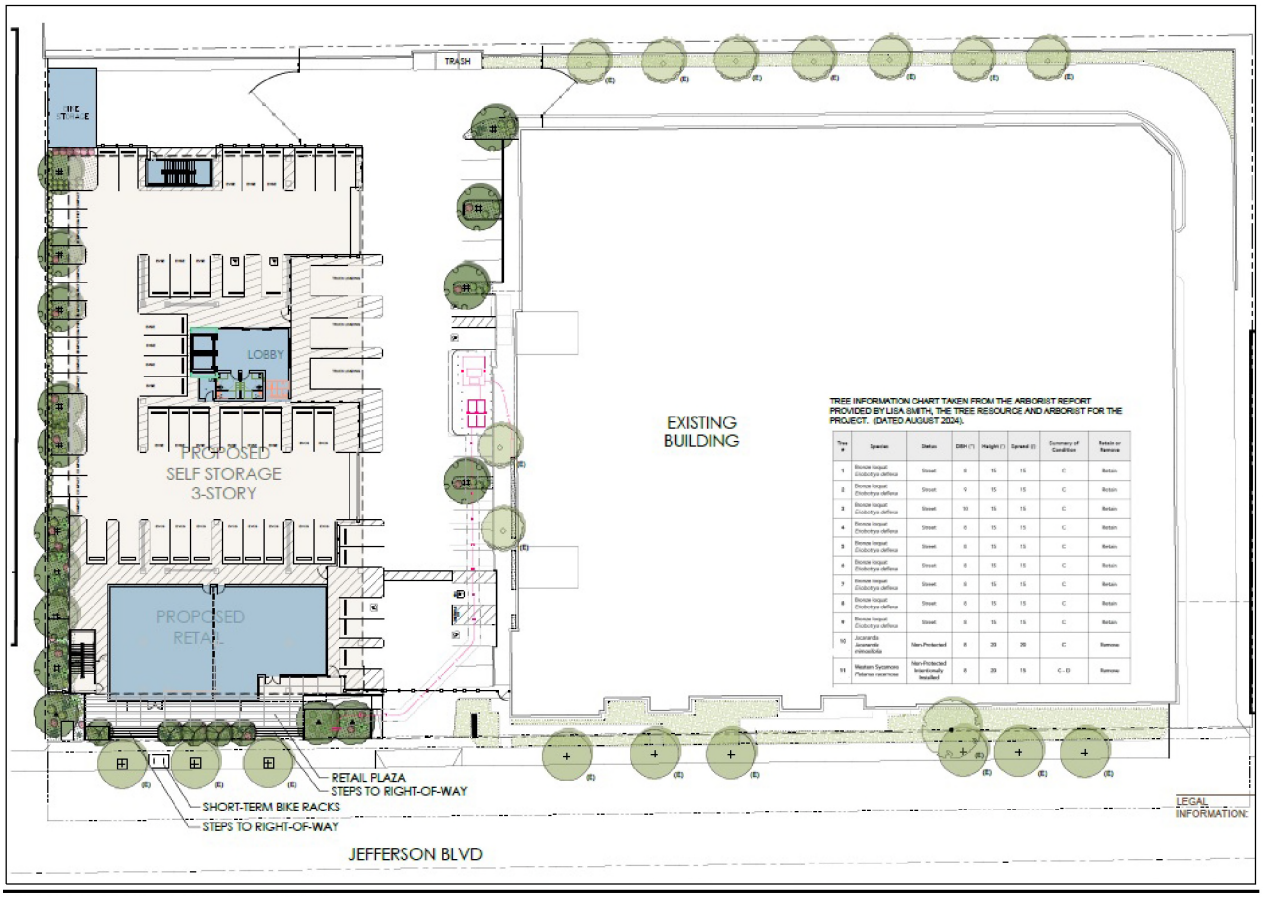

Figure 5. Landscape Plan.

PROJECT BACKGROUND

Project Site

The project site consists of three (3) relatively flat interior lots with a combined frontage of 498 feet and lot depth of approximately 285 feet, resulting in a gross lot area of 158,123 square feet. The proposed project will provide a 4-foot dedication for approximately 180 feet along Jefferson Boulevard as required by the Bureau of Engineering ("BOE"), resulting in a net lot area of 143,393 square feet. The project site is currently developed with an existing 216,584 square-foot, 57-foot-6-inch-tall, four-story self-storage building at the easterly portion of the property that will remain.

Zoning and Land Use Designation

The project site is located within the Palms – Mar Vista – Del Rey Community Plan and Los Angeles Coastal Transportation Corridor Specific Plan. The project site has a Light Manufacturing land use designation, which has corresponding zones of MR2 and M2. The project site is zoned M2-1, which is consistent with one of the land use designations. The project site is located within

Height District No. 1, which permits a Floor Area Ratio ("FAR") of one and a half times the Buildable Area (1.5:1) and unlimited building height in the M2 Zone. The project site is subject to Footnote No. 1 of the Community Plan, which subjects the project site to the regulations of Height District No. 1. The project site is in an Urban Agriculture Incentive Zone, Methane Zone, and Liquefaction Zone. The project site is located 5.1 kilometers from the Newport – Inglewood Fault Zone. The existing zoning of the project site and surrounding properties are shown in **Figure 6**.

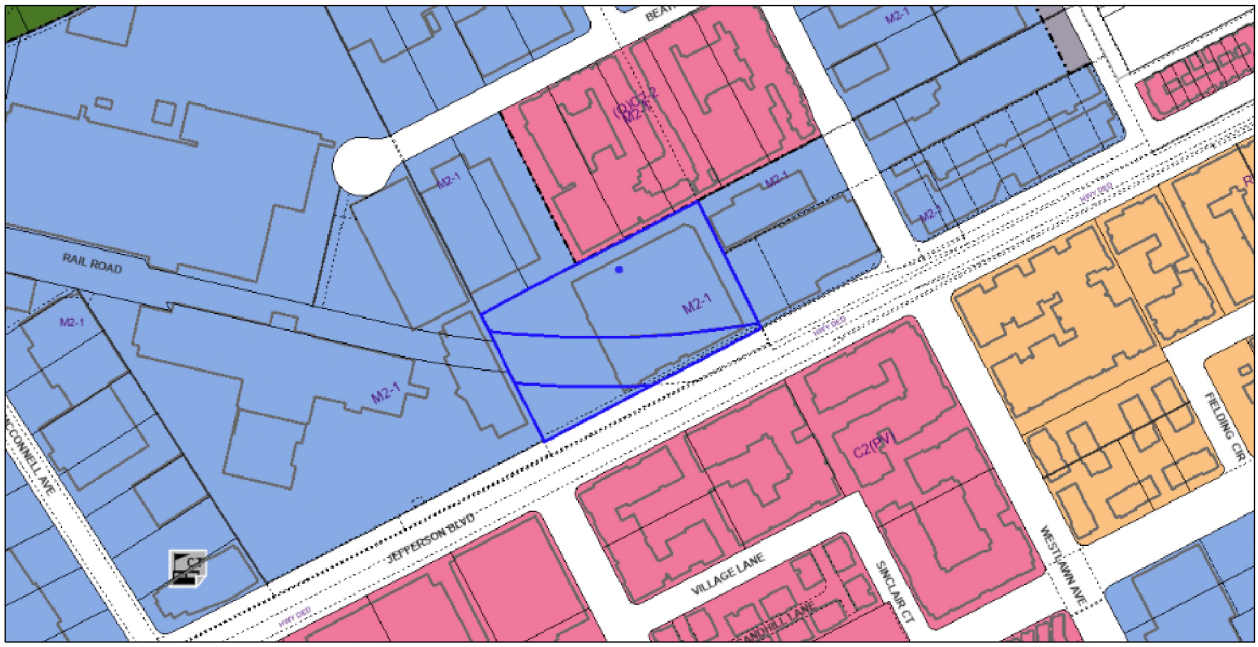

Figure 6. ZIMAS view of the project site and surrounding properties.

Surrounding Uses

The project site is in an urbanized area. The abutting properties to the north, along Beatrice Street, are zoned M2-1 and (Q)C2-2 are developed with a commercial warehouse building and apartment buildings. The abutting properties to the south, across Jefferson Boulevard, are zoned C2(PV) and developed with apartment buildings. The abutting properties to the east are zoned M2-1 and developed with an office building and light manufacturing building. The abutting properties to the west are zoned M2-1 and developed with an office building. Other properties along the subject block of Jefferson Boulevard (bounded by McConnell Avenue to the west and Westlawn Avenue to the east) are zoned M2-1 and developed with a public charter school commercial shopping center.

Streets and Circulation

Jefferson Boulevard, abutting the project site to the south, is designated by the Mobility Plan as a Boulevard II with a designated right-of-way width of 110 feet and roadway width of 80 feet. Jefferson Boulevard has an actual right-of-way width of 114 feet and roadway width of approximately 94 feet is fully improved with asphalt roadways, curbs, gutters, sidewalks, streetlights, landscaped parkways, and street trees.

Public Transit

The project site is located within a Transit Priority Area and one-half mile of a Major Transit Stop located at the intersection of Jefferson Boulevard and Westlawn Avenue, served by the Los Angeles County Metropolitan Transit Authority ("Metro") and Culver City's CityBus stops.

Relevant Cases and Building Permits

Subject Site:

Case No. ZA-2018-6890-CU-ZV-SPR – On July 31, 2020, the Zoning Administrator denied a Zone Variance to allow a building height of approximately 57 feet 3 inches in lieu of the maximum 37 feet otherwise permitted by LAMC Section 12.17.6-A,10 and a FAR of 2.4:1 in lieu of the maximum 1.5:1 otherwise permitted in Height District No. 1 by LAMC Section 12.21.1 in conjunction with the construction of a new 120,426 square-foot four-story over basement mini-warehouse facility.

Case No. ZA-2014-1211-CUW – On July 21, 2015, the Zoning Administrator approved a Conditional Use Permit to allow the installation of a new rooftop unmanned Wireless Telecommunications Facility in the M2-1 Zone.

Case No. DIR-2005-1806-SPR – On June 17, 2005, the Director of Planning approved a Site Plan Review to allow the construction of an 82,213 square-foot two-story addition to an existing 133,635 square-foot storage facility, providing 64 additional parking spaces.

Case No. AA-2000-3862-PMLA – On June 1, 2001, the Deputy Advisory Agency approved a Preliminary Parcel Map for the merger and subdivision of three existing lots into two new lots.

Case No. CPC-1999-536-SPR – On November 29, 1999, the Director of Planning approved a Site Plan Review to allow the construction of a 135,000 square-foot, 58-foot-tall, self-storage warehouse building with 1,500 square feet of related retail, providing 49 parking spaces.

Permit No. 05014-30000-11994 – On January 4, 2007, a Building Permit was issued for the construction of 2nd and 3rd floor additions within an existing storage building and restriping of the parking lot to provide additional parking spaces.

Permit No. 99010-10000-03867 – On June 21, 2000, a Building Permit was issued for the construction of a new self-service warehouse.

Permit No. 00019-10000-00187 – On April 5, 2000, a Demolition Permit was issued for the demolition of an existing single-family dwelling, barn, and accessory structures.

Surrounding Sites:

Case No. CPC-2017-4365-ZC – On March 8, 2018, the City Planning Commission approved and recommended that the City Council adopt the Westchester-Playa Del Rey Community Plan Implementation Overlay (CPIO) and Century/Aviation Subarea establishing development standards and Zone Change from [T][Q]C2-2 to [T][Q]C2-2-CPIO, C2-2 to C2-2-CPIO, and M2-1 to M2-1-CPIO at a majority of the properties zoned for commercial use in the area generally bounded by Sepulveda Boulevard to the west, 96th Street to the north, La Cienega Boulevard to the east, and 102nd Street to the south.

Case No. CPC-2003-5865-ZC-GPA-SP-DA – On December 10, 2009, the City Planning Commission approved and recommended that the City Council adopt a General Plan Amendment to the Westchester-Play Del Rey Community Plan, Zone Change for the second phase area, and Specific Plan Amendment to the Area D of the Playa Vista Specific Plan at 12200 West Jefferson Boulevard.

REQUESTED ACTIONS

General Plan Amendment

Footnote No.1 of the Palms - Mar Vista - Del Rey Community Plan Land Use Map requires that Light Industrial land uses with corresponding zones of MR2 and M2 comply with the regulations of Height District No. 1. The project site is currently zoned M2-1. M-zoned properties in Height District No. 1 are limited to a FAR of 1.5:1 whereas M-zoned properties in Height District No. 2 are limited to a FAR of 6:1. Pursuant to Charter Section 555 and LAMC Section 11.5.6, the applicant is requesting a General Plan Amendment to amend Footnote No. 1 of the map to allow Height District No. 2 for the project site. This request is being made directly in conjunction with the Height District Change as described below.

Height District Change

The project proposes the construction, use, and maintenance of an 82,324 square-foot mixed-use building, consisting of ground floor retail and self-storage uses. The project site is already developed with a 216,584 square-foot self-storage building that will remain. The overall size of the proposed development on the project site will be approximately 298,908 square feet on 143,393 square-foot lot, which exceeds the maximum FAR of 1.5:1 allowed in Height District No. 1. Pursuant to LAMC Section 12.32, the applicant is requesting a Height District Change from Height District No. 1 to Height District No. 2 to allow a maximum Floor Area Ratio of 2.1:1 or approximately 301,125 square feet of floor area. **Table 2** provides a comparison of the existing and proposed Height Districts.

Table 2: Existing vs. Proposed.

	Maximum FAR	Maximum SF	Maximum Height
Present: M2-1	1.5:1	215,090 SF	Unlimited
Proposed: M2-2	6:1	860,358 SF	Unlimited
Proposed Project	2.1:1	301,125 SF	44 feet 3 inches

Conditional Use Permit

Storage buildings for household goods in the M1, M2 and M3 Zones when within 500 or fewer feet from an A or R Zone or residential use is only permitted with a Conditional Use Permit. The project site is located within 500 feet of an R Zone and residential uses; the property immediately north of the site and south of Jefferson Boulevard are zoned C2 and developed with multi-family residential uses. Pursuant to LAMC Section 12.24 W.50, the applicant is requesting a Conditional Use Permit to allow a storage building for household goods in the M2 Zone within 500 feet from an R Zone or residential use.

Zoning Administrator's Adjustment

Storage buildings for household goods are allowed in the M2 Zone, provided the building or structure is more than 500 feet from an A or R Zone or residential use and the building or structure is no more than 37 feet in height. The project site is located within 500 feet of an R Zone and residential use, on the opposite corner of an R4-zoned property and across the street from multi-family residential buildings. The project proposes a building height of 44 feet 3 inches, a less than 20 percent increase from permitted height of 37 feet. Pursuant to LAMC Section 12.28, the applicant is requesting a Zoning Administrator's Adjustment to allow a building height of 44 feet 3 inches in lieu of the maximum building height of 37 feet for storage buildings for household goods within 500 feet of an R Zone or residential use as permitted by LAMC Section 12.17.6 A.10.

Site Plan Review

Any development project which creates, or results in an increase of, 50,000 gross square feet or more of nonresidential floor area is required to obtain a Site Plan Review. The project proposes the construction, use, and maintenance of an 82,324 square-foot mixed-use building, consisting of ground floor retail and self-storage uses. Pursuant to LAMC Section 16.05, the applicant is requesting a Site Plan Review to allow a development project that is creating 50,000 gross square feet or more of nonresidential floor area.

PUBLIC HEARING

A public hearing on this matter with the Hearing Officer was held virtually via Zoom on Wednesday, September 3, 2025 (see Public Hearing and Communications, Page P-1).

ISSUES AND CONSIDERATIONS

Increased FAR and Height

Staff received a letter from the Del Rey Residents Association stating their concern with the proposed project. The letter states that the project site is already built out to the density allowed and questions why the proposed project is allowed to exceed the allowable density. While the specific reasons for their concern were not stated, issues with commercial/industrial intensity are typically associated with increased floor area and height and its effect on neighborhood compatibility, traffic and parking, and the environment. While the applicant requests a Height District Change from Height District No. 1 to Height District No. 2, the proposed project will limit the FAR of the site to 2.1:1 and approximately 298,908 square feet of floor area for both the existing and proposed buildings on the project site. As shown in Table 2, Height District 2 would allow up to 860,358 square feet for the site, however, the proposed and resulting total floor area of the site would be far less. The proposed building itself only has an FAR of 0.57 and approximately 82,324 square feet of new floor area. The applicant provided a FAR and Height Exhibit analyzing the development on the surrounding properties (**Exhibit D**):

- The properties abutting the project site to the north is developed with four-story and five-story apartment buildings with an FAR of 1.88:1 and height of 55 feet and a two-story commercial warehouse building with an FAR of 0.62:1 and height of 25 feet.
- The property abutting the project site to the south, across Jefferson Boulevard, is developed with five-story apartment buildings with an FAR of 1.96 and height of 60 feet.
- The property abutting the project site to the west is developed with a three-story office building with an FAR of 1.53:1 and height of 47 feet.
- The property abutting the project site to the east is developed with a six-story office building with an FAR of 1.85 and height of 94 feet.

With regards to neighborhood compatibility, the proposed building will have a smaller FAR and height than most of the surrounding buildings. The existing and proposed buildings will be located on separate sides of the project site, separated by a surface parking lot, which will eliminate massing and create a sense of openness. The proposed project will observe voluntary front, side, and rear yard setbacks to further contribute to the openness and provide separation from the surrounding buildings. With regards to traffic and parking, the proposed project is designed to encourage multiple forms of transportation in addition to driving, such as walking and biking, to reduce automobile traffic. The proposed project will be served by public transit as the project site is located within a Transit Priority Area and one-half mile of a Major Transit Stop. The proposed project is a mixed-use development that combines retail and self-storage uses. The ground floor retail spaces will open to a landscaped entrance plaza that can be directly accessed from the

sidewalk to facilitate pedestrian activity. Furthermore, the proposed project will provide bicycle parking to promote bicycling. Lastly, the proposed project will incorporate elements of environmental sustainability through green building (solar panels) and sustainable transportation (EV parking spaces).

Parking

The proposed project initially included a request for a Conditional Use Permit to allow a maximum 20% reduction in the required parking to 75 parking spaces in lieu of the 93 parking spaces as required by LAMC Section 12.21 A.4. After the public hearing, the applicant submitted revised application materials to remove the request. Instead, the proposed project will utilize a parking reduction pursuant to Assembly Bill 2097 ("AB 2097"). AB 2097 prohibits a public agency from imposing or enforcing any minimum automobile parking requirement on any residential, commercial, or other development project that is within one-half mile of a Major Transit Stop. The project site is located within a Transit Priority Area and one-half mile of a Major Transit Stop located at the intersection of Jefferson Boulevard and Westlawn Avenue, served by the Los Angeles County Metropolitan Transit Authority ("Metro") and Culver City's CityBus stops.

Storage buildings for household goods are required to provide one parking space for each 500 square feet of floor area for the first 10,000 square feet and one parking space for each 5,000 square feet of floor area in excess of the first 10,000 square feet. Retail uses are required to one parking space for each 250 square of floor area. The proposed project will have 294,949 square feet of self-storage uses and 3,959 square feet of retail uses, which would typically require 77 parking spaces for the self-storage uses and 16 parking spaces for the retail uses. Although the proposed project will be utilizing AB 2097 to eliminate parking requirements, the proposed project is voluntarily providing 70 parking spaces for the existing and proposed uses.

Professional Volunteer Program

The proposed project was reviewed by the Department of City Planning's Urban Design Studio ("UDS") and the Professional Volunteer Program ("PVP"). The PVP panel reviewed the proposed project on May 21, 2024. The following comments were provided by the PVP:

Pedestrian First:

- Planting and steps in front of retail are a nice pedestrian amenity.
- What type of retail is proposed? (boxes and tape for storage use, or another type of retail use?)
- Tenant signage looks boring and nondescriptive. Enhance the retail spaces to be more welcoming to new tenants and more unique from the rest of the building.

360° Design:

- Blank wall on the façade could use some artwork or some articulation (mural or some art to give back to the community).
- Variation of the plane/depth of the façade would be helpful to soften the façade.
- The retail façade is somewhat bland, improve the appearance to look more distinguished.

Climate Adapted:

- Planting of new trees on the site is positive. More trees and impervious surface should be provided toward the back of the lot where there is room for tree planting.
- Good opportunity to provide LID, bioswale towards the rear of the site, rest area for visitors/employees.
- Prioritize locally native plants, especially those that will do well in a coastal setting.
- Place overhead utilities underground.

On September 13, 2024, the applicant submitted a letter addressing the PVP comments. While no revisions were made as a result, the applicant provided a direct response to each PVP comment. Most notably, the applicant explained that the parking layout addresses the concepts proposed in the Above Grade Parking Advisory, that the project design incorporates a harmonious blend of form and function based on community stakeholder feedback, that the overhead utilities are considered high voltage and cannot be placed underground, and that the applicant team had a preliminary meeting with the Los Angeles Fire Department to review fire access and circulation and no issues were identified at this point. The applicant's letter is included as **Exhibit D**.

CONCLUSION

Based on the information submitted to the record, and the surrounding uses and zones, Staff recommends that the City Planning Commission approve the requested General Plan Amendment, Height District Change, Conditional Use Permit, Zoning Administrator's Adjustment, and Site Plan Review, subject to the Conditions of Approval, in conjunction with the construction, use, and maintenance of a new mixed-use building consisting of retail and self-storage uses.

CONDITIONS FOR EFFECTUATING (T) TENTATIVE CLASSIFICATION REMOVAL

Pursuant to Section 12.32 G of the Municipal Code, the (T) Tentative Classification shall be removed by the recordation of a final parcel or tract map or by posting of guarantees through the B-permit process of the City Engineer to secure the following without expense to the City of Los Angeles, with copies of any approval or guarantees provided to the Department of City Planning for attachment to the subject planning case file.

Dedications and Improvements. Prior to the issuance of any building permits, public improvements and dedications for streets and other rights-of-way adjoining the subject property shall be guaranteed to the satisfaction of the Bureau of Engineering, Department of Transportation, Fire Department (and other responsible City, regional, and Federal government agencies as may be necessary).

Responsibilities/Guarantees:

1. As part of early consultation, plan review, and/or project permit review, the applicant/developer shall contact the responsible agencies to ensure that any necessary dedications and improvements are specifically acknowledged by the applicant/developer.

2. **Bureau of Engineering.** Prior to the issuance of signoffs for final site plan approval and/or project permits by the Department of City Planning, the applicant/developer shall provide written verification to the Department of City Planning from the responsible agency acknowledging the agency's consultation with the applicant/developer. The required dedications and improvements may necessitate redesign of the project. Any changes to the project design required by a public agency shall be documented in writing and submitted for review by the Department of City Planning.

    a. Dedication Required:

        i. **Jefferson Boulevard** (Boulevard II) – Accept a 4-foot-wide future street along the property frontage approximately 180 feet from the far most southwest end to the eastside of the existing driveway approach to complete a 12-foot-wide border.

    b. Improvement Required:

        i. **Jefferson Boulevard** – Remove and reconstruct the access ramp at the southwest end of the frontage to the current ADA compliant access ramp. Remove existing concrete sidewalk and construct full border width sidewalk abutting the new property line (12-foot wide where dedicated and 8-foot wide where not dedicated) for the entire frontage. Remove and replace existing curb and gutter, and any broken or uneven pavement along the entire property frontage satisfactory to the BOE - West Los Angeles District office.

    Notes: Broken curb and/or gutter includes segments within existing score lines that are depressed or upraised by more than ¼ inch from the surrounding concrete work or are separated from the main body of the concrete piece by a crack through the entire vertical segment and greater than 1/8 inch at the surface of the section.

    Non-ADA compliant sidewalk shall include any sidewalk that has a cross slope that exceeds 2% and/or is depressed or upraised by more than ¼ inch from the

surrounding concrete work or has full concrete depth cracks that have separations greater than 1/8 inch at the surface. The sidewalk also includes that portion of the pedestrian path of travel across a driveway.

All new sidewalk curb and gutter shall conform to the Bureau of Engineering Standard Plans S410-2, S440-4, S442-6 and S444-0.

Upgrade all existing curb ramps to comply with ADA requirements.

Install tree wells with root barriers and plant street trees satisfactory to the City Engineer and the Urban Forestry Division of the Bureau of Street Services. The applicant should contact the Urban Forestry Division for further information at https://engpermits.lacity.org/public or via https://appointments.lacity.org/apptsys/Public/Account.

Notes: Street lighting may be required satisfactory to the Bureau of Street Lighting at https://lalights.lacity.org or via https://appointments.lacity.org/apptsys/Public/Account.

Department of Transportation may have additional requirements for dedication and improvements.

Refer to the Department of Transportation regarding traffic signals, signs and equipment at (213) 485-1062 or via https://appointments.lacity.org/apptsys/Public/Account.

Regarding any conflicts with power pole matters, contact the Department of Water and Power at (213) 367-0562 or via https://appointments.lacity.org/apptsys/Public/Account.

Refer to the Fire Department Hydrants and Access Unit regarding fire hydrants at (213) 482-6543 or via https://appointments.lacity.org/apptsys/Public/Account.

e. Provide proper drainage for street being improved and for the site being developed.

f. Sewer lines exist in Jefferson Boulevard. Extension of the house connection lateral to the new property line may be required. All Sewerage Facilities Charges and Bonded Sewer Fees are to be paid prior to obtaining a building permit.

g. Submit a request to the West Los Angeles (WLA) District Office sewer counter to determine the capacity of the existing public sewer to accommodate the proposed development at https://engpermits.lacity.org/public or via https://appointments.lacity.org/apptsys/Public/Account.

h. Submit a parking area and driveway plan to the WLA District Office of the Bureau of Engineering and the Department of Transportation for review and approval.

3. **Urban Forestry.**

a. Project shall preserve all healthy mature street trees whenever possible. All feasible alternatives in project design should be considered and implemented to retain healthy mature street trees. A permit is required for the removal of any street tree and shall be replaced 2:1 as approved by the Board of Public Works and Urban Forestry Division.

b. When street dedications are required and to the extent possible, the project shall provide larger planting areas for existing street trees to allow for growth and planting of larger stature street trees. This includes and is not limited to parkway installation and/or enlargement of tree wells and parkways.

c. Plant street trees at all feasible planting locations within dedicated streets as directed and required by the Bureau of Street Services, Urban Forestry Division. All tree plantings shall be installed to current tree planting standards when the City has previously been paid for tree plantings. The subdivider or contractor shall notify the Urban Forestry Division at: (213) 847-3077 upon completion of construction for tree planting direction and instructions.

Note: Removal of street trees requires approval from the Board of Public Works. All projects must have environmental (CEQA) documents that appropriately address any removal and replacement of street trees. Contact Urban Forestry Division at: (213) 847-3077 for tree removal permit information.

4. **Department of Transportation.**

a. Transportation Impact Assessment (TIA) Fee. Pursuant to Section 1.D.2 of the Fee Ordinance 186105 as authorized by the Coastal Transportation Corridor Specific Plan (CTC SP) an applicant for a project within the Specific Plan area, except as exempted, shall pay, or guarantee payment of a TIA Fee prior to issuance of any building permit. Applicable fee rates are identified in the TIA Fee Table of the Fee Ordinance.

Pursuant to Section 1.C.4 of the Fee Ordinance No. 186105 as authorized by the CTC SP, the Transportation Cost Factor shall be increased (or decreased) as of January 1 of each year by the amount of the percentage increase (or decrease) in the most recently available City Building Code Index, as determined by DOT. Therefore, the actual TIA Fee may vary depending upon when payment is made to DOT.

b. Highway Dedication and Street Widening. The applicant for the project has consulted with the City of Los Angeles Bureau of Engineering (BOE) regarding potential highway dedication of street widening requirements. Per the BOE, the Project is required to provide a 5-foot dedication along the Project's frontage on Jefferson Boulevard, resulting in a half right-of-way width of 55 feet (for Boulevard II standard) consistent with the City of Los Angeles' Mobility Plan 2035. These requirements must be guaranteed before the issuance of any building permit through the B-permit process of the BOE. They must be constructed and completed prior to the issuance of any certificate of occupancy to the satisfaction of DOT and BOE.

c. Project Access and Circulation. The proposed site plan is acceptable to DOT; however, review of the study does not constitute approval of the driveway dimensions and internal circulation schemes. Those will require separate review and approval and should be coordinated with DOT's West LA/Coastal Development Review Section (7166 W. Manchester Avenue / (213) 485-1062 / ladot.devreview.wla@lacity.org). In order to minimize potential building design changes, the applicant should contact DOT for driveway width and internal circulation requirements so that such traffic flow considerations are design and incorporated early into the building and parking layout plans. All truck loading and unloading should take place on site with no vehicles backing into the project from public streets via any of the project driveways.

d. Development Review Fees. Section 19.15 of the LAMC identifies specific fees paid to DOT for traffic study review, condition clearance, and permit issuance. The applicant shall comply with any applicable fees per this ordinance.

e. Worksite Traffic Control Requirements. DOT recommends that a construction work site traffic control plan be submitted to DOT's Citywide Temporary Traffic Control Section or Permit Plan Review Section for review and approval prior to the start of any construction work. Refer to https://ladot.lacity.gov/businesses/plan-review-checklists to determine which section to coordinate review of the work site traffic control plan. The plan should show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. DOT also recommends that all construction related truck traffic be restricted to off-peak hours to the extent feasible.

5. **LA Sanitation and Environment.**

a. In accordance with the Municipal Separate Storm Sewer (MS4) National Pollutant Discharge Elimination System (NPDES) Permit (Order No. R4-2012-0175, NPDES No. CAS004001) and the City of Los Angeles Stormwater and Urban Runoff Pollution Control requirements (Chapter VI, Article 4.4, of the Los Angeles Municipal Code), the Project shall comply with all mandatory provisions to the Stormwater Pollution Control Measures for Development Planning (also known as Low Impact Development [LID] Ordinance). Prior to issuance of grading or building permits, the applicant shall submit a LID Plan to the City of Los Angeles, Public Works, LA Sanitation, Stormwater Program for review and approval. The LID Plan shall be prepared consistent with the requirements of the Planning and Land Development Handbook for Low Impact Development.

b. All construction sites are required to implement a minimum set of BMPs for erosion control, sediment control, non-stormwater management, and waste management. In addition, construction sites with active grading permits are required to prepare and implement a Wet Weather Erosion Control Plan during the rainy season between October 1 and April 15. Construction sites that disturb more than one-acre of land are subject to the NPDES Construction General Permit issued by the State of California, and are required to prepare, submit, and implement the Storm Water Pollution Prevention Plan (SWPPP).

c. The City has a standard requirement that applies to all proposed residential developments of four or more units or where the addition of floor areas is 25 percent or more, and all other development projects where the addition of floor area is 30 percent or more. Such developments must set aside a recycling area or room for onsite recycling activities. For more details of this requirement, please contact LA Sanitation Solid Resources Recycling hotline 213-922-8300.

6. **Fire Department.** Prior to the issuance of building permit, a plot plan shall be submitted to the Fire Department for approval.

QUALIFIED (Q) CONDITIONS

Pursuant to LAMC Section 12.32 G, the following limitations are hereby imposed upon the use of the subject property, subject to the Qualified (Q) Classification:

1. **Site Development.** Except as modified herein, the project shall be in substantial conformance with the plans and materials stamped "Exhibit A" and attached to the subject case file. No change to the plans will be made without prior review by the Department of City Planning and written approval by the Director of Planning, with each change being identified and justified in writing. Minor deviations may be allowed in order to comply with provisions of the Municipal Code, the subject conditions, and the intent of the subject permit authorization.

2. **Use.** Development at the project site is limited to uses the permitted in the M2 Zone, except as modified by the conditions herein or subsequent action.

[D] DEVELOPMENT LIMITATIONS

Pursuant to Section 12.32 G.4 of the Los Angeles Municipal Code, the following restrictions are hereby imposed upon the use of the subject property, subject to the "D" Development Limitation classification:

1. **Floor Area.** Development at the project site shall substantially conform with Exhibit A of Case No. CPC-2024-115-GPA-ZC-HD-CU-ZAA-SPR and not exceed a maximum FAR of 2.1:1 or 301,125 square feet.

2. **Height.** Development at the project site is limited to the maximum height permitted in Height District No. 2.

CONDITIONS OF APPROVAL

Entitlement Conditions

1. **Site Development.** Except as modified herein, the project shall be in substantial conformance with the plans and materials stamped "Exhibit A" and attached to the subject case file. No change to the plans will be made without prior review by the Department of City Planning and written approval by the Director of Planning, with each change being identified and justified in writing. Minor deviations may be allowed in order to comply with provisions of the Municipal Code, the subject conditions, and the intent of the subject permit authorization.

2. **Use**. Approved herein is the construction, use, and operation of a mixed-use building consisting of ground floor retail uses and a self-storage use.

3. **Height**. The proposed project shall be limited to a maximum height of 44 feet 3 inches per Exhibit A.

4. **Floor Area Ratio ("FAR")**. The project site shall be limited to a maximum FAR of 2.1:1 or approximately 301,125 square feet, comprised of existing and proposed floor area. The proposed project shall be limited to 82,324 square feet, per Exhibit A.

5. **Automobile Parking.** The project shall be permitted to provide a minimum of zero parking spaces pursuant to California Government Code Section 65863.2 (AB 2097). Seventy (70) parking spaces are provided, as shown in Exhibit A.

6. **Bicycle Parking.** Bicycle parking shall be provided in conformance with the Los Angeles Municipal Code ("LAMC").

7. **Signage.** On-site signs shall be limited to the maximum allowable under the LAMC.

8. **Lighting.** All outdoor and parking lighting shall be shielded and down-cast within the site in a manner that prevents the illumination of adjacent public rights-of-way, adjacent properties, and the night sky (unless otherwise required by the Federal Aviation Administration (FAA) or for other public safety purposes).

9. **Landscape Plan.** The landscape plan shall indicate landscape points for the proposed project as required by LAMC 12.40 and Landscape Ordinance Guidelines O. All open areas not used for buildings, driveways, parking areas, recreational facilities or walks shall be landscaped, including an automatic irrigation system, and maintained in accordance with a final landscape plan prepared by a licensed landscape architect or licensed architect, and submitted for approval to the Department of City Planning. The final landscape plan shall be in substantial conformance with the submitted landscape plan, Exhibit A, and shall incorporate any modifications required as a result of this grant.

10. **Street Trees**. Street trees shall be provided and/or maintained to the satisfaction of the Urban Forestry Division.

11. **Roof Structures.** Any structures on the roof, such as air conditioning units and other equipment, shall be fully screened from view from any abutting properties.

12. **Solar-Ready Buildings.** The proposed project shall comply with the Los Angeles Municipal Green Building Code, Section 99.05.211, to the satisfaction of the Department of Building and Safety.

Environmental Conditions

13. **Mitigation Monitoring Program.** The proposed project shall comply with the adopted Mitigation Monitoring Program in compliance with Appendix J of the State CEQA Guidelines.

14. **MM-TRIBAL-1.**

    a. **Monitor Retention.** Prior to commencing any Ground Disturbance Activities (as defined below) at the Project site, the Applicant, or its successor, shall retain a qualified tribal monitor from and approved by the Gabrieleno Band of Mission Indians – Kizh Nation (Tribe). Ground Disturbance Activities shall include excavating, digging, trenching, grading, or a similar activity at the Project site (i.e., both on-site and any off-site locations that are included in the Project description/definition and/or required in connection with the Project, such as public improvement work). The Applicant, or its successor, and the tribal monitor shall execute a monitoring agreement prior to the earlier of the commencement of any Ground Disturbance Activities, or the issuance of any permit necessary to commence a Ground Disturbance Activity.

    b. **WEAP.** Prior to commencing any Ground Disturbance Activities, the tribal monitor shall provide Worker Environmental Awareness Program (WEAP) training to construction crews involved in Ground Disturbance Activities that includes information on regulatory requirements for the protection of tribal cultural resources. As part of the WEAP training, construction crews shall be briefed on proper procedures to follow should a crew member discover tribal cultural resources during Ground Disturbance Activities. In addition, workers will be shown examples of the types of resources that would require notification of the tribal monitor. The Applicant shall maintain on the Project site, for potential City inspection, documentation establishing the WEAP training was completed for all members of the construction crew involved in Ground Disturbance Activities.

    c. **On-Site Monitoring.** The tribal monitor shall observe all Ground Disturbance Activities on the Project site at all times any Ground Disturbance Activities are taking place. If Ground Disturbance Activities are simultaneously occurring at multiple locations on the Project site, the tribal monitor shall determine if additional monitors are required for other locations where such simultaneous Ground Disturbance Activities are occurring. The tribal monitor(s) will complete daily monitoring logs that will provide descriptions and locations of the relevant Ground Disturbance Activities, the type of construction activities performed, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered “tribal cultural resources” as defined in California Public Resources Code Section 21074, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the Applicant and/or the City upon request to the Tribe. If any Project scheduled activities require the tribal monitor(s) to leave the Project site for a period of time and return, confirmation shall be submitted to the Tribe by the Applicant, in writing, upon completion of each set of scheduled activities and five (5) days’ notice (if possible) shall be submitted to the Tribe by the Applicant, in writing, prior to the start of each set of scheduled activities. The on-site monitoring shall end when either 1) confirmation is received from the Applicant, in writing, that all scheduled activities pertaining to all Ground Disturbance Activities are completed; or 2) the Tribe provides a determination, in writing, that no future, planned construction activity, and/or development/construction phase at the Project site possesses the potential to impact any tribal cultural resources.

d. **Discovery of Resources.** In the event that any objects or artifacts that may be a tribal cultural resource are encountered during the course of any Ground Disturbance Activities, all such activities shall temporarily cease within the area of discovery, the radius of which shall be at least 25 feet or otherwise determined by the tribal monitor pursuant to the process set forth below:

i. Upon a discovery of a potential tribal cultural resource, the Applicant, or its successor, shall immediately stop all Ground Disturbance Activities in the immediate vicinity of the find (i.e. at least 25 feet or otherwise determined by the tribal monitor) until the find can be assessed by the tribal monitor.

ii. If the tribal monitor determines the resources are Native American in origin, the tribal monitor will recommend steps for treatment of all discovered tribal cultural resources such as, but not limited to, the following: statement of the preference for preservation in place (i.e., avoidance) per CEQA Guidelines Section 15126.4(b)(3); description of methods for the adequate recovery of scientifically consequential information; requirements to coordinate with the tribal monitor to ensure that consideration is given to the cultural values ascribed to a resource beyond that which is scientifically important in the event the resource is Native American in origin; and procedures for curating any archaeological materials at a public, non-profit curation facility, university or museum with a research interest in the materials.

iii. The Applicant, or its successor, shall implement the Tribe's treatment recommendations if the tribal monitor concludes that the Tribe's recommendations are reasonable and feasible.

iv. In addition to any treatment recommendations pursuant to the above, the tribal monitor shall develop a list of actions that shall be taken to avoid or minimize impacts to the identified tribal cultural resources substantially consistent with best practices identified by the Native American Heritage Commission and in compliance with any applicable federal, state or local law, rule or regulation.

v. The Applicant, or its successor, may recommence Ground Disturbance Activities within the specified radius of the discovery site, so long as this radius has been reviewed by the tribal monitor and determined to be reasonable and appropriate, and so long as the Applicant has complied with all of the recommendations developed and approved pursuant to the process set forth in Paragraphs 2 through 4 above. The Applicant, or its successor, may recommence Ground Disturbance Activities within the specified radius of the discovery site, so long as this radius has been reviewed by the tribal monitor and determined to be reasonable and appropriate, and so long as the Applicant has complied with all of the recommendations developed and approved pursuant to the process set forth in Paragraphs 2 through 4 above.

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

vii. Notwithstanding Paragraph 6 above, any information that Los Angeles Department of City Planning, in consultation with the Los Angeles City

Attorney's Office, determines to be confidential in nature shall be excluded from submission to the SCCIC or provided to the public under the applicable provisions of the California Public Records Act, California Public Resources Code (PRC), Section 7927.000, and handled in compliance with the City's AB 52 Confidentiality Protocols.

viii. Native American monitoring and excavation during construction projects will be consistent with current professional standards. All feasible care to avoid any unnecessary disturbance, physical modification, or separation of human remains and associated funerary objects shall be taken.

e. **Discovery of Human Remains and Funerary Items.** Native American human remains are defined in Public Resources Code (PRC) Section 5097.98(d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, also called associated grave goods in PRC Section 5097.98(a), are also to be treated according to this statute. If Native American human remains and/or grave goods are discovered or recognized on the Project Site, then PRC Sections 5097.9 et seq. as well as Health and Safety Code Section 7050.5 shall be followed. Human remains and grave/burial goods shall be treated alike per PRC section 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.

Administrative Conditions

15. **Final Plans.** Prior to the issuance of any building permits for the project by the Department of Building and Safety, the applicant shall submit all final construction plans that are awaiting issuance of a building permit by the Department of Building and Safety for final review and approval by the Department of City Planning. All plans that are awaiting issuance of a building permit by the Department of Building and Safety shall be stamped by Department of City Planning staff "Plans Approved". A copy of the Plans Approved, supplied by the applicant, shall be retained in the subject case file.

16. **Notations on Plans.** Plans submitted to the Department of Building and Safety, for the purpose of processing a building permit application shall include all of the Conditions of Approval herein attached as a cover sheet and shall include any modifications or notations required herein.

17. **Approval, Verification and Submittals.** Copies of any approvals, guarantees or verification of consultations, review of approval, plans, etc., as may be required by the subject conditions, shall be provided to the Department of City Planning prior to clearance of any building permits, for placement in the subject file.

18. **Code Compliance.** Use, area, height, and yard regulations of the zone classification of the subject property shall be complied with, except where granted conditions differ herein.

19. **Department of Building and Safety**. The granting of this determination by the Director of Planning does not in any way indicate full compliance with applicable provisions of the Los Angeles Municipal Code Chapter IX (Building Code). Any corrections and/or modifications to plans made subsequent to this determination by a Department of Building and Safety Plan Check Engineer that affect any part of the exterior design or appearance of the project as approved by the Director, and which are deemed necessary by the Department of Building and Safety for Building Code compliance, shall require a referral of the revised plans back to

the Department of City Planning for additional review and sign-off prior to the issuance of any permit in connection with those plans.

20. **Enforcement.** Compliance with these conditions and the intent of these conditions shall be to the satisfaction of the Department of City Planning.

21. **Covenant.** Prior to the issuance of any permits relative to this matter, an agreement concerning all the information contained in these conditions shall be recorded in the County Recorder's Office. The agreement shall run with the land and shall be binding on any subsequent property owners, heirs or assign. The agreement must be submitted to the Department of City Planning for approval before being recorded. After recordation, a copy bearing the Recorder's number and date shall be provided to the Department of City Planning for attachment to the file.

22. **Indemnification and Reimbursement of Litigation Costs.**

    Applicant shall do all of the following:

    (i) Defend, indemnify and hold harmless the City from any and all actions against the City relating to or arising out of, in whole or in part, the City's processing and approval of this entitlement, including but not limited to, an action to attack, challenge, set aside, void, or otherwise modify or annul the approval of the entitlement, the environmental review of the entitlement, or the approval of subsequent permit decisions, or to claim personal property damage, including from inverse condemnation or any other constitutional claim.

    (ii) Reimburse the City for any and all costs incurred in defense of an action related to or arising out of, in whole or in part, the City's processing and approval of the entitlement, including but not limited to payment of all court costs and attorney's fees, costs of any judgments or awards against the City (including an award of attorney's fees), damages, and/or settlement costs.

    (iii) Submit an initial deposit for the City's litigation costs to the City within 10 days' notice of the City tendering defense to the Applicant and requesting a deposit. The initial deposit shall be in an amount set by the City Attorney's Office, in its sole discretion, based on the nature and scope of action, but in no event shall the initial deposit be less than $50,000. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).

    (iv) Submit supplemental deposits upon notice by the City. Supplemental deposits may be required in an increased amount from the initial deposit if found necessary by the City to protect the City's interests. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).

    (v) If the City determines it necessary to protect the City's interest, execute an indemnity and reimbursement agreement with the City under terms consistent with the requirements of this condition.

    The City shall notify the applicant within a reasonable period of time of its receipt of any action and the City shall cooperate in the defense. If the City fails to notify the applicant of any claim, action, or proceeding in a reasonable time, or if the City fails to reasonably

cooperate in the defense, the applicant shall not thereafter be responsible to defend, indemnify or hold harmless the City.

The City shall have the sole right to choose its counsel, including the City Attorney's office or outside counsel. At its sole discretion, the City may participate at its own expense in the defense of any action, but such participation shall not relieve the applicant of any obligation imposed by this condition. In the event the Applicant fails to comply with this condition, in whole or in part, the City may withdraw its defense of the action, void its approval of the entitlement, or take any other action. The City retains the right to make all decisions with respect to its representations in any legal proceeding, including its inherent right to abandon or settle litigation.

For purposes of this condition, the following definitions apply:

"City" shall be defined to include the City, its agents, officers, boards, commissions, committees, employees, and volunteers.

"Action" shall be defined to include suits, proceedings (including those held under alternative dispute resolution procedures), claims, or lawsuits. Actions includes actions, as defined herein, alleging failure to comply with any federal, state or local law.

Nothing in the definitions included in this paragraph are intended to limit the rights of the City or the obligations of the Applicant otherwise created by this condition.

FINDINGS

General Plan/Charter Findings

1. **General Plan.**

   a. **General Plan Land Use Designation**. The project site is located within the Palms – Mar Vista – Del Rey Community Plan area, which designates the project site for Light Manufacturing land uses corresponding to the MR2 and M2 Zones. The project site has an underlying zone of M2-1, which is consistent with the land use designation. Height District No. 1 permits a Floor Area Ratio ("FAR") of 1.5:1 while Height District No. 2 permits a FAR of 6:1. The project proposes a Height District Change from Height District No. 1 to Height District No. 2 to allow the proposed project to be developed with an FAR of 2.1:1. The General Plan Amendment will maintain the requisite consistency by amending Footnote No. 1 of the Community Plan Map to indicate that Height District No. 2 applies to the project site. The recommended Height District Change to Height District No. 2 will be consistent with the recommended General Plan Amendment and will be in substantial conformance with the purpose, intent, and provisions of the General Plan as it is reflected within the Palms – Mar Vista – Del Rey Community Plan.

   b. **Charter Section 555. The General Plan may be amended in its entirety, by subject elements or parts of subject elements, or by geographic areas, provided that the part or area involved has significant social, economic, or physical identity.**

      The proposed project is for the expansion of an existing self-storage use on a property owned and operated by Public Storage. The proposed project involves the construction, use, and maintenance of an 82,324 square-foot, 44-foot-3-inch-tall, three-story mixed-use building over a basement consisting of ground floor retail and self-storage uses on a 143,393 square-foot lot. The project site is currently developed with a 216,584 square-foot, 57-foot-6-inch-tall, four-story self-storage building that will remain. The project site is located within the Palms – Mar Vista – Del Rey Community Plan area, which designates the project site for Light Manufacturing land uses corresponding to the MR2 and M2 Zones. The project site has an underlying zone of M2-1, which is consistent with the land use designation.

      The surrounding area is developed with a mix of residential, commercial, and industrial uses. The properties abutting the project site to the north is developed with apartment buildings and a commercial warehouse building. The property abutting the project site to the south, across Jefferson Boulevard, is developed with apartment buildings. The property abutting the project site to the west is developed with an office building. The property abutting the project site to the east is developed with an office building.

      Through the approval of the General Plan Amendment, Footnote No. 1 of the Community Plan Map will be amended to allow Height District No. 2 for the project site. The General Plan Amendment is related to the request for a Height District Change from Height District No. 1 to Height District No. 2 to allow a Floor Area Ratio of 2.1:1 or approximately 298,908 square feet of floor area. The existing building was built in 2001 and has been operating as a self-storage facility since. As mentioned, the proposed project will expand and enhance the existing use by adding retail space and additional self-storage units in a new building. The proposed project would therefore improve an existing property by allowing the self-storage facility to accommodate the demands of existing and new members and incorporate retail spaces to provide additional services to residents and employees of the nearby community. Further, the proposed project's new improvements will help activate the streetscape within the vicinity of the project site, thereby promoting linkages within the

surrounding area and contributing to the significant economic and physical identity of the area. Therefore, the proposed General Plan Amendment is consistent with City Charter Section 555 because the project site is located within an area with significant social, economic, and physical identity.

c. **Charter Section 556. The action is in substantial conformance with the purposes, intent, and provisions of the General Plan.**

The General Plan sets forth goals, objectives, policies, and programs that guide both citywide and community-specific land uses. The City's General Plan is comprised of individual elements, which serve to provide a blueprint for the future, and prescribe policy goals and objectives to shape and guide the physical development of the City. The City's General Plan is comprised of a Framework Element; Land Use Element; Air Quality Element; Conservation Element; Health Element; Safety Element; Mobility Element; Infrastructure Systems Element (which incorporates the Sewerage Facilities Element); Open Space Element; Public Facilities & Services Element; Noise Element; and Housing Element.

As discussed below, the project substantially conforms with the General Plan's Land Use Designation for the Property, as well as the Land Use Element, Framework Element, and, Mobility Element. Further, the project would neither impede nor be inconsistent with any of the General Plan's other elements.

General Plan Land Use Designation. The project site is located within the Palms – Mar Vista – Del Rey Community Plan area, which designates the project site for Light Manufacturing land uses corresponding to the MR2 and M2 Zones. The project site has an underlying zone of M2-1, which is consistent with the land use designation. Height District No. 1 permits a Floor Area Ratio ("FAR") of 1.5:1 while Height District No. 2 permits a FAR of 6:1. The project proposes a Height District Change from Height District No. 1 to Height District No. 2 to allow the proposed project to be developed with an FAR of 2.1:1. The General Plan Amendment will maintain the requisite consistency by amending Footnote No. 1 of the Community Plan Map to indicate that Height District No. 2 applies to the project site. The recommended Height District Change to Height District No. 2 will be consistent with the recommended General Plan Amendment and will be in substantial conformance with the purpose, intent, and provisions of the General Plan as it is reflected within the Palms – Mar Vista – Del Rey Community Plan.

Land Use Element. The proposed project complies the applicable provisions of the Los Angeles Municipal Code ("LAMC") and Palms – Mar Vista – Del Rey Community Plan. There are 12 Elements of the General Plan. Each of these Elements establishes policies that provide for the regulatory environment in managing the City and for addressing environmental concerns and problems. Many of the policies derived from these Elements are in the form of requirements of the LAMC.

The Land Use Element of the City's General Plan is divided into 35 Community Plans. The project site is located within the Palms – Mar Vista – Del Rey Community Plan, which designates the project site for Light Manufacturing land uses corresponding to the MR2 and M2 Zones.

Palms – Mar Vista – Del Rey Community Plan. The Community Plan text includes the following relevant objectives, policies, and programs:

Goal 3: *Sufficient land for a variety of industrial uses with maximum employment opportunities which are environmentally sensitive, safe for the work force with minimal adverse impact on adjacent uses.*

Objective 3-1: *To provide a viable industrial base with job opportunities for residents with minimal environmental and visual impacts to the community.*

Policy 3-1.1: *Designate and preserve lands for the continuation of existing industry and development of new industrial parks, research and development uses, light manufacturing and similar uses which provide employment opportunities.*

Policy 3-1.2: *Ensure compatibility between industrial and other adjoining land uses through design treatments, compliance with environmental protection standards and health and safety requirements.*

Policy 3-1.3: *Require that any proposed development be designed with adequate buffering and landscaping and that the proposed use be compatible with adjacent residential development.*

The proposed construction, use, and maintenance of a mixed-use building consisting of retail and self-storage uses in conjunction with the continued use and maintenance of an existing self-storage building is consistent with the above-referenced goal, objective, and policies. The proposed project will provide employment opportunities through the retention and expansion of an existing commercial/industrial use. As an existing use, the proposed project will be compatible with the surrounding land uses. From an architectural standpoint, the proposed project will provide voluntary setbacks at the front, westerly side yard, and rear yard to ensure that the project site is adequately landscaped and buffered from adjacent residential development. As recommended, the General Plan Amendment and Height District Change will be consistent with the above-referenced goal, objective, and policies of the Palms – Mar Vista – Del Rey Community Plan.

Framework Element. The Framework Element for the General Plan (Framework Element) was adopted by the City of Los Angeles in December 1996 and re-adopted in August 2001. The Framework Element provides guidance regarding policy issues for the entire City of Los Angeles, including the project site. The Framework Element also sets forth a Citywide comprehensive long-range growth strategy and defines Citywide polices regarding such issues as land use, housing, urban form, neighborhood design, open space, economic development, transportation, infrastructure, and public services. The Framework Element includes the following provisions, objectives and policies relevant to the instant request:

Goal 3A: *A physically balanced distribution of land uses that contributes towards and facilitates the City's long-term fiscal and economic viability, revitalization of economically depressed areas, conservation of existing residential neighborhoods, equitable distribution of public resources, conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, assurance of environmental justice and a healthful living environment, and achievement of the vision for a more livable city.*

Objective 3.1: *Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.*

Policy 3.1.1: *Identify areas on the Long-Range Land Use Diagram and in the community plan sufficient for the development of a diversity of uses that serve the needs of existing and future residents (housing, employment, retail, entertainment, cultural/institutional, educational, health services, recreation, and similar uses), provide job opportunities, and support visitors and tourism.*

Objective 3.2: *Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicular trips, vehicle miles traveled, and air pollution.*

Policy 3.2.1: *Provide a pattern of development consisting of distinct districts, centers, boulevards, and neighborhoods that are differentiated by their functional role, scale, and character. This shall be accomplished by considering factors such as the existing concentrations of use, community-oriented activity centers that currently or potentially service adjacent neighborhoods, and existing or potential public transit corridors and stations.*

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.*

Policy 3.4.1: *Conserve existing stable residential neighborhoods and lower-intensity commercial districts and encourage the majority of new commercial and mixed-use (integrated commercial and residential) development to be located (a) in a network of neighborhood districts, community, regional, and downtown centers, (b) in proximity to rail and bus transit stations and corridors, and (c) along the City's major boulevards, referred to as districts, centers, and mixed-use boulevards, in accordance with the Framework Long-Range Land Use Diagram.*

Goal 3J: *Industrial growth that provides job opportunities for the City's residents and maintains the City's fiscal viability.*

Objective 3.14: *Provide land and supporting services for the retention of existing and attraction of new industries.*

Policy 3.14.2: *Provide flexible zoning to facilitate the clustering of industries and supporting uses, thereby establishing viable "themed" sectors.*

The proposed project will contribute to the City's long-term fiscal and economic viability by developing a new mixed-use building consisting of retail and self-storage uses on a vacant portion of a property already developed with an existing self-storage building. The proposed mixed-use building will introduce new retail uses while expanding the existing self-storage use. This will provide additional diversity to the neighborhood which is currently developed with a mix of residential, commercial, and industrial uses. The proposed project will provide valuable services to residents of the adjacent residential buildings nearby while also being accessible to those who are further away in the

neighborhood as it is in an area in proximity to public transit. The General Plan Amendment to facilitate the Height District Change will allow the proposed project to be built in a sensible manner through additional floor area. It will also provide street dedication and sidewalk widening and improvements, thereby enhancing pedestrian safety and comfort along Jefferson Boulevard. The proposed project is consistent with the above-referenced goal, objectives, and policies of the Framework Element.

Mobility Element. The Mobility Element of the General Plan (Mobility Plan 2035) is likely to be affected by the recommended action herein through the imposition of street dedications and improvements along the property frontage along Jefferson Boulevard. Jefferson Boulevard is a Boulevard II under Mobility Plan 2035 with a designated right-of-way width of 110 feet and roadway width of 80 feet. The half right-of-way includes a 35-foot roadway and 7.5-foot sidewalk.

The Bureau of Engineering ("BOE") is requiring a 4-foot dedication for approximately 180 feet from the far most southwest end to the eastside of the existing driveway approach to complete a 12-foot-wide border along Jefferson Boulevard. BOE is also requiring related improvements to remove and reconstruct a current ADA-compliant access ramp and 8- to 12-foot-wide sidewalk. Conditions for the improvements have been imposed under the (T) Tentative Classification in accordance with Boulevard II standards of Mobility Plan 2025.

The dedication and improvement requirements will continue to advance Mobility Plan 2035's policies in recognizing walking as a component of every trip to ensure high-quality pedestrian access. The access ramp will be brought up to current ADA standards and sidewalk, curbs, and gutter will be replaced to ensure safety and accessibility. The nine existing street trees will remain to enhance the visual appeal of the street. The proposed project as designed and conditioned will meet the following policies of Mobility Plan 2035:

Policy 2.3: *Recognize walking as a component of every trip and ensure high-quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.*

Policy 2.6: *Provide safe, convenient, and comfortable local and regional bicycling facilities for people of all types and abilities.*

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.*

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.*

Policy 3.8: *Provide bicyclists with convenient, secure and well-maintained bicycle parking facilities.*

The proposed project will reconstruct the full border width sidewalk abutting the new property line (12 feet where dedicated and 8 feet where not dedicated) for the entire frontage. The new sidewalk facilities will improve pedestrian activity along Jefferson Boulevard. The proposed mixed-use building will orient the front entrance to be in line with a direct pedestrian path of travel from the sidewalk. The proposed project will provide vehicular access from the existing driveway, which will also be reconstructed to new standards. The project site is in a major employment center with nearby multi-family residential uses and transit service. The project site is located within a Transit Priority Area

and within a one-half mile of the Los Angeles County Metropolitan Transit Authority ("Metro") and Culver City's CityBus stops, which qualify as Major Transit Stops. Furthermore, to accommodate bicycle travel, the proposed project will provide convenient and secure bicycle parking on site as required by the LAMC.

d. **Charter Section 558. The proposed Amendment to the Palms – Mar Vista – Del Rey Community Plan will be in conformance with public necessity, convenience, general welfare and good zoning practice.**

The proposed project involves the construction, use, and maintenance of an 82,324 square-foot, 44-foot-3-inch-tall, three-story mixed-use building over a basement consisting of ground floor retail and self-storage uses on a 143,393 square-foot lot. The project site is currently developed with a 216,584 square-foot, 57-foot-6-inch-tall, four-story self-storage building that will remain. The project site is located within the Palms – Mar Vista – Del Rey Community Plan area, which designates the project site for Light Manufacturing land uses corresponding to the MR2 and M2 Zones. The project site has an underlying zone of M2-1, which is consistent with the land use designation.

The proposed General Plan Amendment is to amend Footnote No. 1 of the Community Plan Map to allow Height District No. 2 for the project site. The General Plan Amendment is related to the request for a Height District Change from Height District No. 1 to Height District No. 2 to allow a Floor Area Ratio of 2.1:1 or approximately 298,908 square feet of floor area. The proposed General Plan Amendment and Height District Change will increase the maximum FAR permitted on the project site, thereby accommodating the expansion of the existing self-storage use through the construction of a new mixed-use building consisting of retail and self-storage uses.

The proposed project will provide a public necessity by optimizing the use of the project site through the expansion of the existing use on site and introduction of new development and public improvements, which will generate increased tax revenues. The proposed development will be at a vacant portion of an industrially zoned property that is located within proximity to multi-family residential buildings, commercial office buildings, and a major commercial shopping center (Runway Playa Vista). Public convenience will be served by addition of viable commercial spaces and additional self-storage units for the residents of the area. The development of the mixed-use building to occupy the undeveloped portion will be safer for the community than having a large area that currently sits vacant. Approval of the Height District Change to M2-1 will not affect the project site's zoning consistency with the land use designation, in keeping with good zoning practice. The Height District Change will accommodate the proposed mixed-use building. The proposed mixed-use building, consisting of retail and self-storage uses, will be consistent with the type of development encouraged by the General Plan and Community Plan. Therefore, the proposed General Plan Amendment to the Community Plan will be in conformance with public necessity, convenience, general welfare, and good zoning practice.

Height District Change Findings; "T" and "Q" Classification Findings

2. **Pursuant to Section 12.32 of the Municipal Code, the Height District Change is deemed consistent with public necessity, convenience, general welfare and good zoning practice.**

a. Public Necessity: Approval of the Height District Change increases the allowable FAR and allows the project site to be developed consistent with the goals and objectives of the General Plan and Community Plan as outlined above. The proposed project involves the

construction, use, and maintenance of an 82,324 square-foot, 44-foot-3-inch, three-story mixed-use building over a basement consisting of retail and self-storage uses on a property already developed with an existing self-storage building. The proposed project will provide a public necessity by optimizing the use of the project site through the expansion of the existing use on site and introduction of new development and public improvements, which will generate increased tax revenues.

b. Convenience: The proposed project will develop a vacant portion of an industrially zoned property that is located within proximity to multi-family residential buildings, commercial office buildings, and a major commercial shopping center (Runway Playa Vista). Public convenience will be served by addition of viable commercial spaces and additional self-storage units for the residents of the area.

c. General Welfare: Approval of the Height District Change from Height District No. 1 and Height District No. 2 allows for development of an undeveloped portion of the project site in a sensible manner with increased FAR. The development of the mixed-use building to occupy the undeveloped portion will be safer for the community than having a large area that currently sits vacant. The proposed project will enhance the urban environment by providing a use that is within the Light Manufacturing land use designation and by improving public facilities surrounding the project site to be in line with Mobility Plan 2035 street standards. Given the proposed project's proximity to existing job centers and transit services, the proposed project will provide a desirable commercial/industrial use to serve the community, thereby advancing the general welfare.

d. Good Zoning Practices: The project site is presently zoned M2-1 and is located within the Light Manufacturing land use designation, which includes the corresponding zones of MR2 and M2. Approval of the Height District Change to M2-1 will not affect the project site's zoning consistency with the land use designation, in keeping with good zoning practice. The Height District Change will accommodate the proposed mixed-use building. The proposed mixed-use building, consisting of retail and self-storage uses, will be consistent with the type of development encouraged by the General Plan and Community Plan.

e. "T" and "Q" Classification: Pursuant to LAMC Sections 12.32-G.1 and G.2, the current action, as recommended, has been made contingent upon compliance with new "T" and "Q" conditions of approval, and project specific conditions of approval imposed herein. Such limitations are necessary to ensure the identified dedications, improvements, and construction notices are issued to meet the public's needs, convenience and general welfare served by the required actions. The conditions that limit the operations, scale and scope of development, are also necessary to protect the best interests of and to assure a development more compatible with surrounding properties and the overall pattern of development in the community, to secure an appropriate development in harmony with the General Plan, and to prevent or mitigate the potential adverse environmental effects of the subject recommended action.

For the reasons stated above, the Height District Change request is beneficial in terms of the public necessity, convenience, general welfare, and good zoning practice and is consistent with the General Plan.

Conditional Use Permit Findings

3. **Conditional Use**

a. **The project will enhance the built environment in the surrounding neighborhood or will perform a function or provide a service that is essential or beneficial to the community, city, or region.**

The proposed project involves the construction, use, and maintenance of an 82,324 square-foot, 44-foot-3-inch, three-story mixed-use building over a basement consisting of ground floor retail and self-storage uses at the undeveloped western portion of the property. The project site is currently improved with an existing 216,584 square-foot, 57-foot-6-inch-tall, four-story self-storage building at the eastern portion of the property that will remain. The applicant is requesting a Conditional Use Permit to allow a storage building for household goods in the M2 Zone within 500 feet from an R Zone and residential use. The nearest R-zoned property is on the southeast corner of Jefferson Boulevard and Westlawn Avenue and developed with a senior living building. The nearest residential use is a multi-family residential building located across Jefferson Boulevard. The proposed project will provide neighborhood-serving uses by expanding on the existing self-storage use and adding new retail uses to serve the residents of the area. The proposed project will enhance the built environment with a well-designed structure, public right-of-way improvements, and landscaping consisting of new groundcover and on-site trees. The proposed mixed-use building will feature the retail spaces at the ground floor and landscaping along the storefront that will enhance the appearance of Jefferson Boulevard. As such, the proposed project will enhance the built environment in the surrounding neighborhood and provide a service that is essential and beneficial to the community, city, and region.

b. **The project's location, size, height, operations and other significant features will be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare, and safety.**

The proposed project involves the construction, use, and maintenance of an 82,324 square-foot, 44-foot-3-inch, three-story mixed-use building over a basement consisting of ground floor retail and self-storage uses. The project site is currently improved with an existing 216,584 square-foot, 57-foot-6-inch-tall, four-story self-storage building that will remain. The applicant is requesting a Conditional Use Permit to allow a storage building for household goods in the M2 Zone within 500 feet from an R Zone and residential use. The nearest R-zoned property is on the southeast corner of Jefferson Boulevard and Westlawn Avenue and developed with a senior living building. The nearest residential use is a multi-family residential building located across Jefferson Boulevard. The proposed project will be in an ideal location as it will optimize the full use of the project site by developing a vacant and underutilized portion of the property. The proposed project will expand the existing self-storage use and incorporate new retail uses to serve the neighborhood, which includes a mix of residential, commercial, and industrial buildings.

With regards to size, the proposed project involves a request for a Height District Change from Height District No. 1 to 2. The requested Height District Change is intended to accommodate an increase in the maximum FAR allowed. The existing M2-1 Zone permits a maximum FAR of 1.5:1 while the proposed M2-2 Zone permits a maximum FAR of 6:1. The proposed project will result in an FAR of 2.1:1 or approximately 298,908 square feet of floor area for the existing and proposed buildings, which represents a relatively minor increase in FAR than what is fully allowed by the M2-2 Zone. The proposed building itself will only have a FAR of 0.57 and approximately 82,324 square feet of floor area. The

existing and proposed buildings will be located on separate sides of the project site, separated by a surface parking lot, which will eliminate massing and create a sense of openness. With regards to height, the proposed project involves a request for a Zoning Administrator's Adjustment to allow a building height of 44 feet 3 inches in lieu of the maximum building height of 37 feet for storage buildings for household goods within 500 feet of an R Zone and residential use. The FAR and height limitations are intended to ensure that development is compatible and not out of mass and scale with the surrounding properties. The surrounding properties include a mix of residential, commercial, and industrial uses within large multi-level buildings. The properties abutting the project site to the north is developed with four-story and five-story apartment buildings with an FAR of 1.88:1 and height of 55 feet and a two-story commercial warehouse building with an FAR of 0.62:1 and height of 25 feet. The property abutting the project site to the south, across Jefferson Boulevard, is developed with five-story apartment buildings with an FAR of 1.96 and height of 60 feet. The property abutting the project site to the west is developed with a three-story office building with an FAR of 1.53:1 and height of 47 feet. The property abutting the project site to the east is developed with a six-story office building with an FAR of 1.85 and height of 94 feet.

The project site is located within a Transit Priority Area and within a one-half mile radius of a Major Transit Stop located at the intersection of Jefferson Boulevard and Westlawn Avenue, served by the Los Angeles County Metropolitan Transit Authority ("Metro") and Culver City's CityBus stops. The project site is subject to AB 2097, which prohibits the City from imposing or enforcing minimum parking requirements on any residential, commercial or other development project that are within a one-half mile radius of a Major Transit Stop. Nevertheless, the proposed project is voluntarily providing 70 automobile parking spaces and 64 bicycle parking spaces. The proposed project will be accessible by many forms of transportation, such as automobile, bicycle, and walking. In terms of emergency access, the project site currently maintains a fire access lane with a driveway at the easterly property line. The fire access lane will be fully extended along the rear property line to serve the proposed project to protect life, healthy, and safety.

There is no required front yard setback, but the proposed project will provide a 11-foot-8-inch front yard setback along Jefferson Boulevard. The front yard setback area will feature an entrance plaza for the retail spaces with stairways leading up from the sidewalk, landscaping, and trees. There are also street trees in the public right-of-way that will remain. The proposed project will also comply with Bureau of Engineering requirements to provide a 4-foot dedication and improve the existing sidewalk. The front yard setback, landscaping, trees, and required street dedication and improvements will combine to provide a buffer and attractive transition to the public right-of-way and adjacent residential uses across the street.

Therefore, the proposed project's location, size, height, operations and other significant features will be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare and safety.

c. **The project substantially conforms with the purpose, intent and provisions of the General Plan, the applicable community plan, and any applicable specific plan.**

The project site is located within the Palms – Mar Vista – Del Rey Community Plan and Los Angeles Coastal Transportation Corridor Specific Plan. The project site has a Light Manufacturing land use designation, which has corresponding zones of MR2 and M2. The project site is zoned M2-1, which is consistent with one of the land use designations. The proposed project involves the construction, use, and maintenance of an 82,324 square-foot, 44-foot-3-inch-tall, three-story mixed-use building over a basement consisting of

ground floor retail and self-storage uses in conjunction with the continued use and maintenance of a 216,584 square-foot, 57-foot-6-inch-tall, four-story self-storage building. The proposed project is requesting a General Plan Amendment, Height District Change, Conditional Use Permit, Zoning Administrator's Adjustment, and Site Plan Review. As provided under Finding No. 1, the proposed project is in substantial conformance with the General Plan and Palms – Mar Vista – Del Rey Community Plan.

d. **The project provides for an arrangement of uses, buildings, structures, open spaces and other improvements that are compatible with the scale and character of the adjacent properties and surrounding neighborhood.**

The proposed project involves the construction, use, and maintenance of an 82,324 square-foot, 44-foot-3-inch, three-story mixed-use building over a basement consisting of ground floor retail and self-storage uses. The project site is currently improved with an existing 216,584 square-foot, 57-foot-6-inch-tall, four-story self-storage building that will remain. While the proposed project involves an increase in the maximum FAR and height allowed, the proposed building itself will still maintain a smaller FAR and height than most of the surrounding buildings. The existing and proposed buildings will be located on separate sides of the project site, separated by a surface parking lot, which will eliminate massing and create a sense of openness. The proposed project will observe voluntary front, side, and rear yard setbacks to further contribute to the openness and provide separation from the surrounding buildings. As such, the proposed project will be compatible with the scale and character of the adjacent properties and surrounding neighborhood.

4. **Zoning Administrator's Adjustment**

a. **While site characteristics or existing improvements make strict adherence to the zoning regulations impractical or infeasible, the project nonetheless conforms with the intent of those regulations.**

The proposed project involves the construction, use, and maintenance of an 82,324 square-foot, 44-foot-3-inch, three-story mixed-use building over a basement consisting of ground floor retail and self-storage uses. The project site is currently improved with an existing 216,584 square-foot, 57-foot-6-inch-tall, four-story self-storage building that will remain. The applicant is requesting a Zoning Administrator's Adjustment to allow a building height of 44 feet 3 inches in lieu of the maximum of 37 feet allowed for the storage of household goods pursuant to LAMC Section 12.17 6 A.10. The 37-foot height limit is impractical as both the existing and proposed Height District has no restrictions on height. Furthermore, the intent of the height regulations is to ensure that development is compatible and not out of mass and scale with the surrounding properties. While there is also a requested Height District Change to accommodate a higher FAR and square footage, the proposed project will not conflict with the mass or scale of the surrounding properties as the immediate area is developed with large multi-level buildings. The additional height for the proposed project is intended to provide variety to the types of commercial uses on site in form the ground floor retail spaces while ensuring adequate self-storage capacity at the basement level and second and third floors. Therefore, the proposed project's height of 44 feet 3 inches is warranted as the proposed project complies with the site-specific height and similar in mass and scale to the surrounding buildings. As such, the proposed project confirms with the intent of the untailored citywide storage building height limitation.

b. **The project's location, size, height, operations and other significant features will be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare, and safety.**

The proposed project involves the construction, use, and maintenance of an 82,324 square-foot, 44-foot-3-inch, three-story mixed-use building over a basement consisting of ground floor retail and self-storage uses. The project site is currently improved with an existing 216,584 square-foot, 57-foot-6-inch-tall, four-story self-storage building that will remain. The applicant is requesting a Zoning Administrator's Adjustment to allow a building height of 44 feet 3 inches in lieu of the maximum of 37 feet allowed for the storage of household goods pursuant to LAMC Section 12.17 6 A.10. The proposed project will be in an ideal location as it will optimize the full use of the project site by developing a vacant and underutilized portion of the property. The proposed project will expand the existing self-storage use and incorporate new retail uses to serve the neighborhood, which includes a mix of residential, commercial, and industrial buildings.

In addition to the requested Zoning Administrator's Adjustment for increased height, the proposed project also involves a request for a Height District Change from Height District No. 1 to 2. The requested Height District Change is intended to accommodate an increase in the maximum FAR allowed. The existing M2-1 Zone permits a maximum FAR of 1.5:1 while the proposed M2-2 Zone permits a maximum FAR of 6:1. The proposed project will result in an FAR of 2.1:1 or approximately 298,908 square feet of floor area for the existing and proposed buildings, which represents a relatively minor increase in FAR than what is fully allowed by the M2-2 Zone. The proposed building itself will only have a FAR of 0.57 and approximately 82,324 square feet of floor area. The existing and proposed buildings will be located on separate sides of the project site, separated by a surface parking lot, which will eliminate massing and create a sense of openness. Even with the increased height and FAR, the proposed project will remain compatible with the adjacent properties and surrounding neighborhood, which includes a mix of residential, commercial, and industrial uses within large multi-level buildings. The properties abutting the project site to the north is developed with four-story and five-story apartment buildings with an FAR of 1.88:1 and height of 55 feet and a two-story commercial warehouse building with an FAR of 0.62:1 and height of 25 feet. The property abutting the project site to the south, across Jefferson Boulevard, is developed with five-story apartment buildings with an FAR of 1.96 and height of 60 feet. The property abutting the project site to the west is developed with a three-story office building with an FAR of 1.53:1 and height of 47 feet. The property abutting the project site to the east is developed with a six-story office building with an FAR of 1.85 and height of 94 feet.

The project site is located within a Transit Priority Area and within a one-half mile radius of a Major Transit Stop located at the intersection of Jefferson Boulevard and Westlawn Avenue, served by the Los Angeles County Metropolitan Transit Authority ("Metro") and Culver City's CityBus stops. The project site is subject to AB 2097, which prohibits the City from imposing or enforcing minimum parking requirements on any residential, commercial or other development project that are within a one-half mile radius of a Major Transit Stop. Nevertheless, the proposed project is voluntarily providing 70 automobile parking spaces and 64 bicycle parking spaces. The proposed project will be accessible by many forms of transportation, such as automobile, bicycle, and walking. In terms of emergency access, the project site currently maintains a fire access lane with a driveway at the easterly property line. The fire access lane will be fully extended along the rear property line to serve the proposed project to protect life, healthy, and safety.

There is no required front yard setback, but the proposed project will provide a 11-foot-8-inch front yard setback along Jefferson Boulevard. The front yard setback area will feature

an entrance plaza for the retail spaces with stairways leading up from the sidewalk, landscaping, and trees. There are also street trees in the public right-of-way that will remain. The proposed project will also comply with Bureau of Engineering requirements to provide a 4-foot dedication and improve the existing sidewalk. The front yard setback, landscaping, trees, and required street dedication and improvements will combine to provide a buffer and attractive transition to the public right-of-way and adjacent residential uses across the street.

Therefore, as described above, the proposed project's location, size, height, operations and other significant features will be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare, and safety.

c. **The project is in substantial conformance with the purposes, intent and provisions of the General Plan, applicable community plan, and any specific plan.**

The project site is located within the Palms – Mar Vista – Del Rey Community Plan and Los Angeles Coastal Transportation Corridor Specific Plan. The project site has a Light Manufacturing land use designation, which has corresponding zones of MR2 and M2. The project site is zoned M2-1, which is consistent with one of the land use designations. The proposed project involves the construction, use, and maintenance of an 82,324 square-foot, 44-foot-3-inch-tall, three-story mixed-use building over a basement consisting of ground floor retail and self-storage uses in conjunction with the continued use and maintenance of a 216,584 square-foot, 57-foot-6-inch-tall, four-story self-storage building. The proposed project is requesting a General Plan Amendment, Height District Change, Conditional Use Permit, Zoning Administrator's Adjustment, and Site Plan Review. As provided under Finding No. 1, the proposed project is in substantial conformance with the General Plan and Palms – Mar Vista – Del Rey Community Plan.

5. **Site Plan Review**

a. **The project is in substantial conformance with the purposes, intent and provisions of the General Plan, applicable community plan, and any applicable specific plan.**

The project site is located within the Palms – Mar Vista – Del Rey Community Plan and Los Angeles Coastal Transportation Corridor Specific Plan. The project site has a Light Manufacturing land use designation, which has corresponding zones of MR2 and M2. The project site is zoned M2-1, which is consistent with one of the land use designations. The proposed project involves the construction, use, and maintenance of an 82,324 square-foot, 44-foot-3-inch-tall, three-story mixed-use building over a basement consisting of ground floor retail and self-storage uses in conjunction with the continued use and maintenance of a 216,584 square-foot, 57-foot-6-inch-tall, four-story self-storage building. The proposed project is requesting a General Plan Amendment, Height District Change, Conditional Use Permit, Zoning Administrator's Adjustment, and Site Plan Review. As provided under Finding No. 1, the proposed project is in substantial conformance with the General Plan and Palms – Mar Vista – Del Rey Community Plan.

b. **The project 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 is or will be compatible with existing and future development on adjacent properties and neighboring properties.**

<u>Compatibility with Existing and Future Development</u>

The proposed mixed-use building consisting of retail and self-storage uses will be consistent with the character of the area. The proposed project will essentially be expanding an existing use as the project site is developed with a self-storage building that will remain. The abutting properties to the north, along Beatrice Street, are zoned M2-1 and (Q)C2-2 are developed with a commercial warehouse building and apartment building. The abutting properties to the south, across Jefferson Boulevard, are zoned C2(PV) and developed with an apartment building. The abutting properties to the east are zoned M2-1 and developed with an office building and light manufacturing building. The abutting properties to the west are zoned M2-1 and developed with an office building. Other properties along the subject block of Jefferson Boulevard (bounded by McConnell Avenue to the west and Westlawn Avenue to the east) are zoned M2-1 and developed with a public charter school commercial shopping center.

Arrangement of Buildings (Height, Bulk, Setbacks)

Height

The M2 Zone in Height District Nos. 1 and 2 does not limit building height or number of stories, but the LAMC does limit the height of self-storage uses within 500 feet of an R Zone or residential use to 37 feet. The project site is located across the street from both an R Zone and multi-family residential buildings and thus subject to the 37-foot height limit. The project is proposing a building height of 44 feet 3 inches. The proposed project will be compatible with the development in the area as it will not exceed the height of the existing self-storage building on site and since the surrounding properties are developed with taller multi-level structures.

Bulk

The project site is comprised of three parcels with a total lot area of 143,393 square feet. The existing M2-1 Zone limits FAR to 1.5:1. The proposed M2-2 Zone will allow an FAR of up to 6:1, but the project proposes an FAR of 2.1:1 or 298,908 square feet for the new and existing buildings combined. With the Height District Change, the proposed project will utilize a relatively minor increase in FAR from 1.5:1 to 2.1:1. Nevertheless, the proposed building will not be out of mass and scale with the existing development on the project site or area as most of the surrounding structures are larger multi-level buildings. Therefore, the proposed project will be compatible with the neighboring properties as it relates to bulk.

Setbacks

No setbacks are required for non-residential development in the M2 Zone. However, the proposed project provides voluntary front and westerly side yard setbacks to allow space for landscaping and a voluntary rear yard setback to allow space for an extension of the existing fire access lane. The proposed building will be set back 11 feet 8 inches from the front property line, 9 feet from the westerly side property line, and 42 feet 6 inches from the rear property line.

Parking, Loading Areas, Trash Collection

The proposed project will provide a total of 70 automobile parking spaces (utilizing AB 2097 for reduced parking), 64 bicycle parking spaces, and three loading parking spaces. The loading parking spaces are located adjacent to the lobby area near the center of the parking lot. There is an existing trash enclosure to remain and new recycling area proposed.

Landscaping

The proposed project will provide approximately 2,927 square feet of landscaped area. The proposed project will remove two trees, retain 19 trees, including nine street trees along Jefferson Boulevard, and plant 21 trees on site (subject to the requirements of the Urban Forestry Division). The landscaping and trees will primarily be planted along the perimeter of the project site and building frontage.

Lighting

The proposed project's lighting scheme is conditioned to be compatible with the surrounding development. Exterior lighting will illuminate onsite facilities to provide sufficient lighting for circulation and security while minimizing impacts on adjacent properties. Ground-level lighting for the building will activate and enhance the pedestrian environment at night.

The proposed project has been conditioned herein to ensure that the proposed arrangement of buildings, off-street parking facilities, and other such pertinent improvements will be compatible with existing and future development on neighboring properties.

c. **Any residential project provides recreational and service amenities to improve habitability for its residents and minimize impacts on neighboring properties.**

The proposed project involves the construction, use, and maintenance of a mixed-use building consisting of retail and self-storage uses and thus the proposed project is not subject to the City's Open Space requirements pursuant to LAMC Section 12.21 G 2. However, the proposed project has been conditioned so that all open areas not used for buildings, driveways, and parking areas be attractively landscaped, that it will include an automatic irrigation system, and that it will be maintained in accordance with a landscape plan prepared by a licensed landscape architect or licensed architect.

Environmental Findings

6. **Mitigated Negative Declaration**. A Mitigated Negative Declaration (ENV-2024-116-MND) was prepared for the proposed project. On the basis of the whole of the record before the lead agency including any comments received, that there is no substantial evidence that the proposed project will have a significant effect on the environment. The attached Mitigated Negative Declaration reflects the lead agency's independent judgment and analysis. Pursuant to Assembly Bill 52, the City completed the tribal consultation process in compliance with the California Environmental Quality Act. The records upon which this decision is based are with the Project Planning Division of the Planning Department in Room 721, 200 North Spring Street.

7. **Flood Insurance**. The National Flood Insurance Program rate maps, which are a part of the Flood Hazard Management Specific Plan adopted by the City Council by Ordinance No. 172,081, have been reviewed and it has been determined that this project is located in Zone C, areas of minimal flooding.

PUBLIC HEARING AND COMMUNICATIONS

PUBLIC HEARING

The public hearing was held on September 3, 2025, at approximately 10:00 a.m. The public hearing was conducted in a virtual format. The public hearing was conducted by the Hearing Officer, Kenton Trinh, on behalf of the City Planning Commission in taking testimony for Case No. CPC-2024-115-GPA-ZC-HD-CU-ZAA-SPR and ENV-2024-116-MND. All interested parties were invited to attend the public hearing at which they could listen, ask questions, or present testimony regarding the project. The purpose of the public hearing was to obtain testimony from affected and/or interested parties regarding this application. Interested parties were also invited to submit written comments regarding the request prior to the public hearing. The environmental analysis was among the matters to be considered at the public hearing. The hearing notice was mailed on August 8, 2025, published in the newspaper on August 8, 2025, and posted on site on August 16, 2025, in accordance with LAMC noticing requirements.

The public hearing was attended by the applicant team (Cherry Maio, Kristofer Golder, Francis Park, Veronique Trimble, and Stacie Henderson) and two speakers who provided comments in support. There were four other attendees who did not speak.

Applicant's Presentation

Kristofer Golder, Vice President of Development (Public Storage):

- Public Storage opened in 1972 and has been in operation with approximately 233 locations for over 50 years.
- The original facility was developed on the project site in 2001 and consists of four stories.
- There has been significant population growth in the area and continues to expand, resulting in the demand for new self-storage units.
- There is a large concentration of customers within a one- to three-mile radius of the project site.
- There were changes to the design based on the feedback from the neighbors.
- The proposed project will have a modern architectural style to compliment the surrounding properties.
- The proposed project was designed with a basement to keep the height down.
- There will be ground floor retail that will provide a storefront connection to pedestrians and activate the street.
- There will be new landscaping and hardscaping.
- The proposed project will attract new customers and retain existing customers.

Public Comments in Support

Ravi Sankaran, President (Del Rey Neighborhood Council):

- The Del Rey NC has reviewed the proposed project and voted to approve the proposed project unanimously.
- The proposed project will serve the community by providing much needed self-storage spaces to nearby residential uses.
- The proposed project is expanding the existing use on site, so it is the ideal location.
- There are adequate trees and setbacks.
- There was no major opposition.
- The Del Rey NC is urging the City to approve the proposed project.

Matt Tecle, Executive Director (Safe Parking LA):

- Safe Parking LA has strong support for the proposed project.
- Mr. Tecle served as Field Deputy for Council District 11 and is familiar with the area.
- Public Storage has been a responsible and engaged neighbor with sincere commitment to improving the community.
- The proposed project fits well with the Jefferson Boulevard corridor.
- The proposed project is a model of urban development that supports the growth and livability of the community.

Applicant's Response

The applicant team provided the following responses addressing comments and questions raised by the Hearing Officer:

- The required onsite posting was completed.
- The project description and requested actions on the public hearing notice was accurate.
- There is no estimate on the number of self-storage units currently.

WRITTEN CORRESPONDENCE

The Del Rey Residents Association submitted a letter dated June 4, 2024, stating their concern with the proposed project. The letter states that the project site is already built out to the density to the density allowed and questions why the proposed project is allowed to exceed the allowable density.

The Del Rey Neighborhood Council submitted a letter dated August 19, 2022, stating their support and approval of the proposed project with the following conditions:

- Solar on the roof to satisfy the energy of the building
- Green roof for any leftover space
- A minimum of 23 trees total (existing and new)
- Parking at the required number
- Green wall on the existing storage facility facing the new structure
- Commitment to provide funds as community benefits
- Adequate bicycle parking for the retail uses

Five current customers of the existing self-storage building submitted letters in support of the proposed project. The letters state the following:

- The proposed design and landscaping are nice.
- The proposed project will continue to revitalize the community.
- The proposed project will provide needed additional self-storage units in the area, which could reduce travel and traffic.
- The proposed project will be in an ideal location as it will expand an existing facility on a vacant portion of the same property.
- The existing facility has been well operated and maintained.

EXHIBIT A

PROJECT PLANS

CPC-2024-115-GPA-ZC-HD-CU-ZAA-SPR

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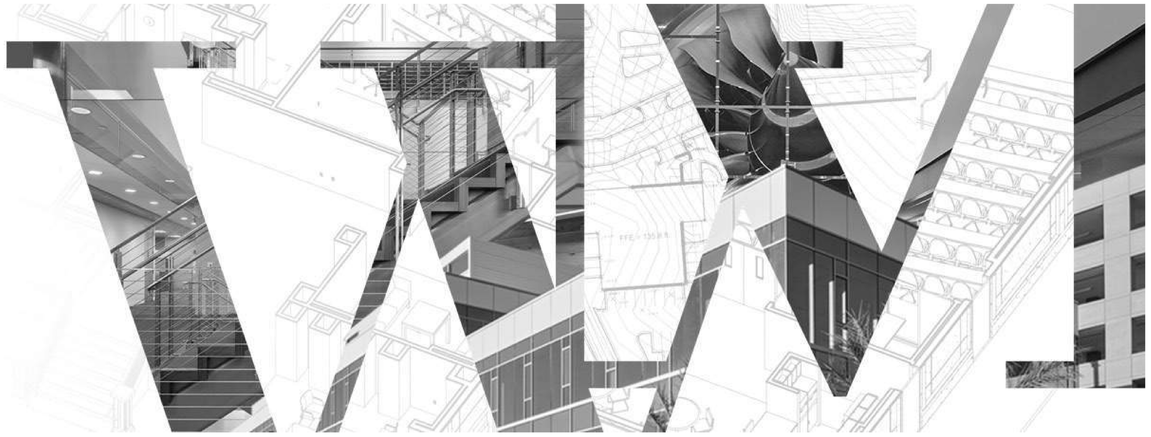
BRANDING | CIVIL ENGINEERING



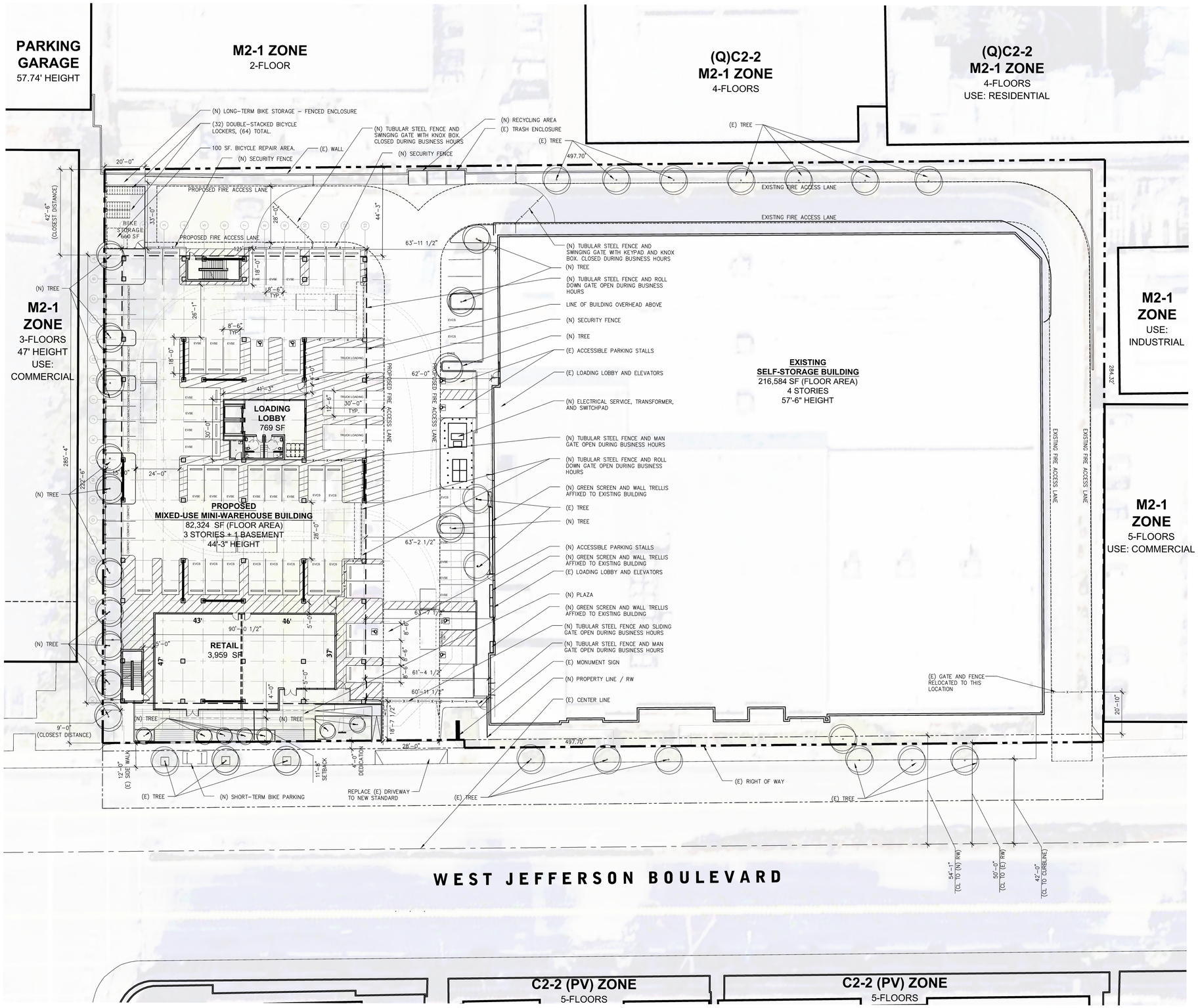
PUBLIC STORAGE

12681 WEST JEFFERSON BOULEVARD
LOS ANGELES, CALIFORNIA

CONCEPTUAL DESIGN
LAX18-0019-00
09/09/2025

TOTAL PAGES IN THIS PACKAGE: **16**

WARE MALCOMB
ARCHITECTURE | PLANNING | INTERIORS
BRANDING | CIVIL ENGINEERING



PROJECT DESCRIPTION:

CONSTRUCTION OF NEW THREE-STORY MINI-WAREHOUSE AND RETAIL BUILDING WITH BASEMENT AND SITE WORK.

PROJECT DATA:

SITE AREA:		
GROSS SITE AREA:	3.63 AC	158,123 SF
BUILDABLE AREA (AFTER DEDICATION):	3.29 AC	143,393 SF
EXISTING BUILDING AREA		216,584 SF
NEW BUILDING FLOOR AREA:		
BASEMENT:		25,801 SF
1ST FLOOR AREA:		4,921 SF
2ND - 3RD FLOOR AREA (25,801 SF PER FLOOR):		51,602 SF
NEW BUILDING FLOOR AREA TOTAL:		82,324 SF
TOTAL BUILDING FLOOR AREA (EXISTING + PROPOSED)		298,908 SF
TOTAL RETAIL FLOOR AREA:		3,959 SF
TOTAL MINI-WAREHOUSE FLOOR AREA:		294,949 SF
FAR (PROPOSED):		2.1:1
EXISTING ZONING:		M2-1
PROPOSED ZONING:		M2-2
EXISTING USE:		MINI-WAREHOUSE
PROPOSED USE:		MINI-WAREHOUSE / RETAIL

SETBACKS (PROPOSED BUILDING):	**REQUIRED**	**PROVIDED**
FRONT YARD (JEFFERSON):	0'-0"	11'-8"
SIDE YARD:	0'-0"	9'-0"
REAR SETBACK:	0'-0"	42'-6"

NEW GROSS BUILDING AREA:	84,752 GSF
NEW GROSS RETAIL:	4,138 GSF
NEW GROSS MINI-WAREHOUSE:	80,614 GSF
PROPOSED BUILDING HEIGHT:	44'-3"
EXISTING BUILDING HEIGHT:	57'-6"

VEHICULAR PARKING REQUIRED: NO PARKING REQUIRED PER AB2097

REQUIRED RETAIL + WAREHOUSE PARKING TOTAL (PER AB2097):	0 STALLS
VEHICULAR PARKING PROVIDED: (EXCLUDING TRUCK LOADING)	70 STALLS
EXISTING STALLS:	
STANDARD	14 STALLS
ACCESSIBLE	4 STALLS
NEW STALLS:	
STANDARD	37 STALLS
COMPACT (17%)	12 STALLS
ACCESSIBLE	3 STALLS
TRUCK LOADING PARKING:	3 STALLS

EVSE PARKING		
EV CAPABLE (EVSE) (30%)	70 X 30%	21 STALLS
EV CHARGING STATION (EVCS)	70 X 20%	14 STALLS

LONG-TERM BICYCLE PARKING		
BIKE PARKING REQUIRED (RETAIL):	1/2,000	2 SPACES
BIKE PARKING REQUIRED (WAREHOUSE):	1/10,000	30 SPACES
SHORT-TERM BICYCLE PARKING		
BIKE PARKING REQUIRED (RETAIL):	1/2,000	2 SPACES
BIKE PARKING REQUIRED (WAREHOUSE):	1/10,000	30 SPACES
TOTAL BICYCLE PARKING REQUIRED:		64 SPACES
TOTAL BICYCLE PARKING PROVIDED:		64 SPACES

LEGAL INFORMATION:

APN:	4211-005-017, 4211-009-025, 4211-009-028
ZONING:	M2-1
LOT:	FR-28
BLOCK:	(NONE)
TRACT:	TR-30549
DEEDS:	4114, 315027, 286359, 2319, 1546122, 1427372, 1417881PR

1" = 20'
0 10 20 40 100
NORTH

This conceptual design is based upon a preliminary review of entitlement requirements and on unverified and possibly incomplete site and/or building information, and is intended merely to assist in exploring how the project might be developed. Signage shown is for illustrative purposes only and does not necessarily reflect municipal code compliance.

Conceptual Plot Plan

PUBLIC STORAGE
12681 West Jefferson Boulevard, Los Angeles, California 90066

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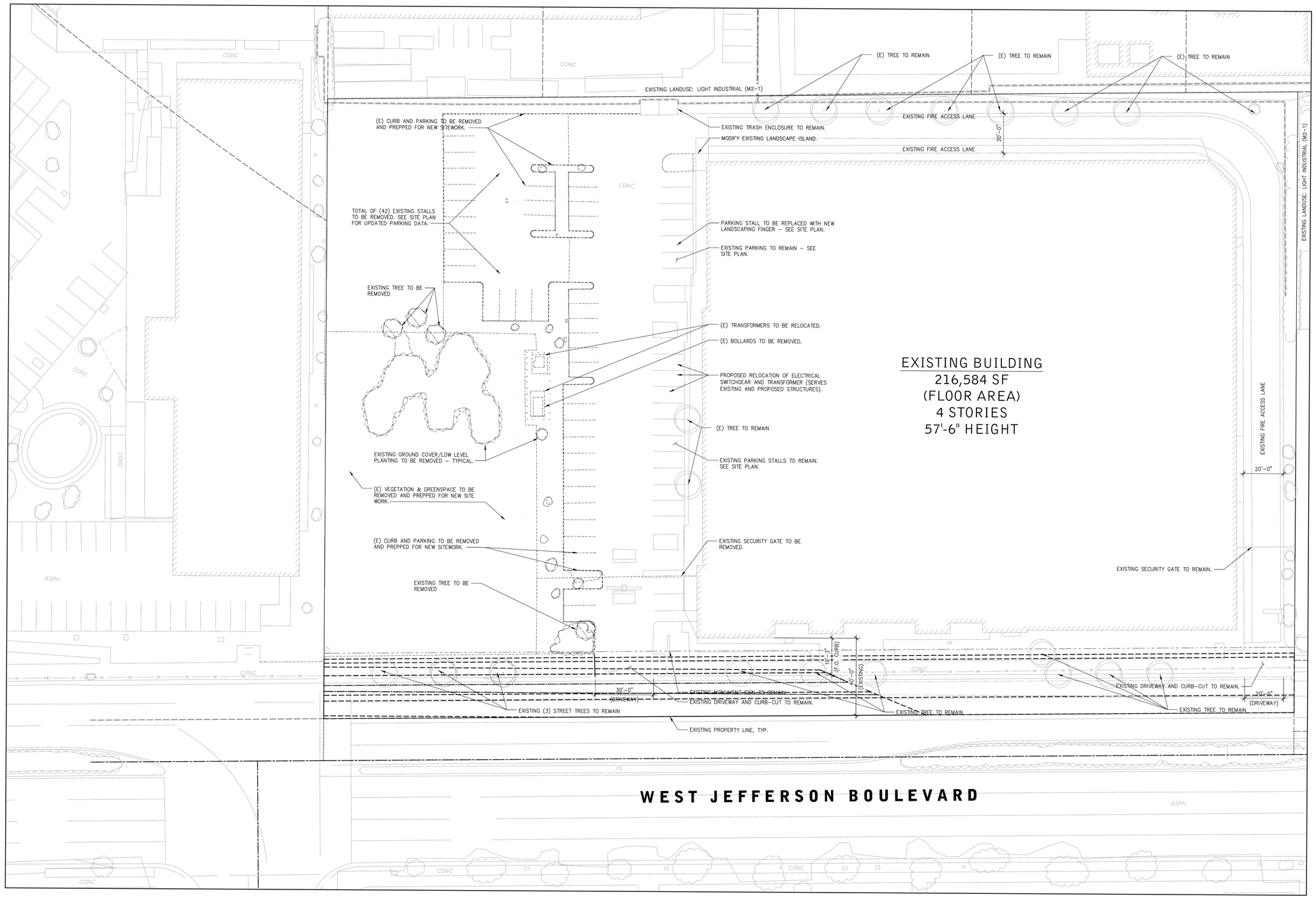
09/09/2025

SHEET
A1.0



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0 10 20 40 100

NORTH

Public Storage

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Site Demolition Plan

PUBLIC STORAGE
12681 West Jefferson Boulevard, Los Angeles, California 90066

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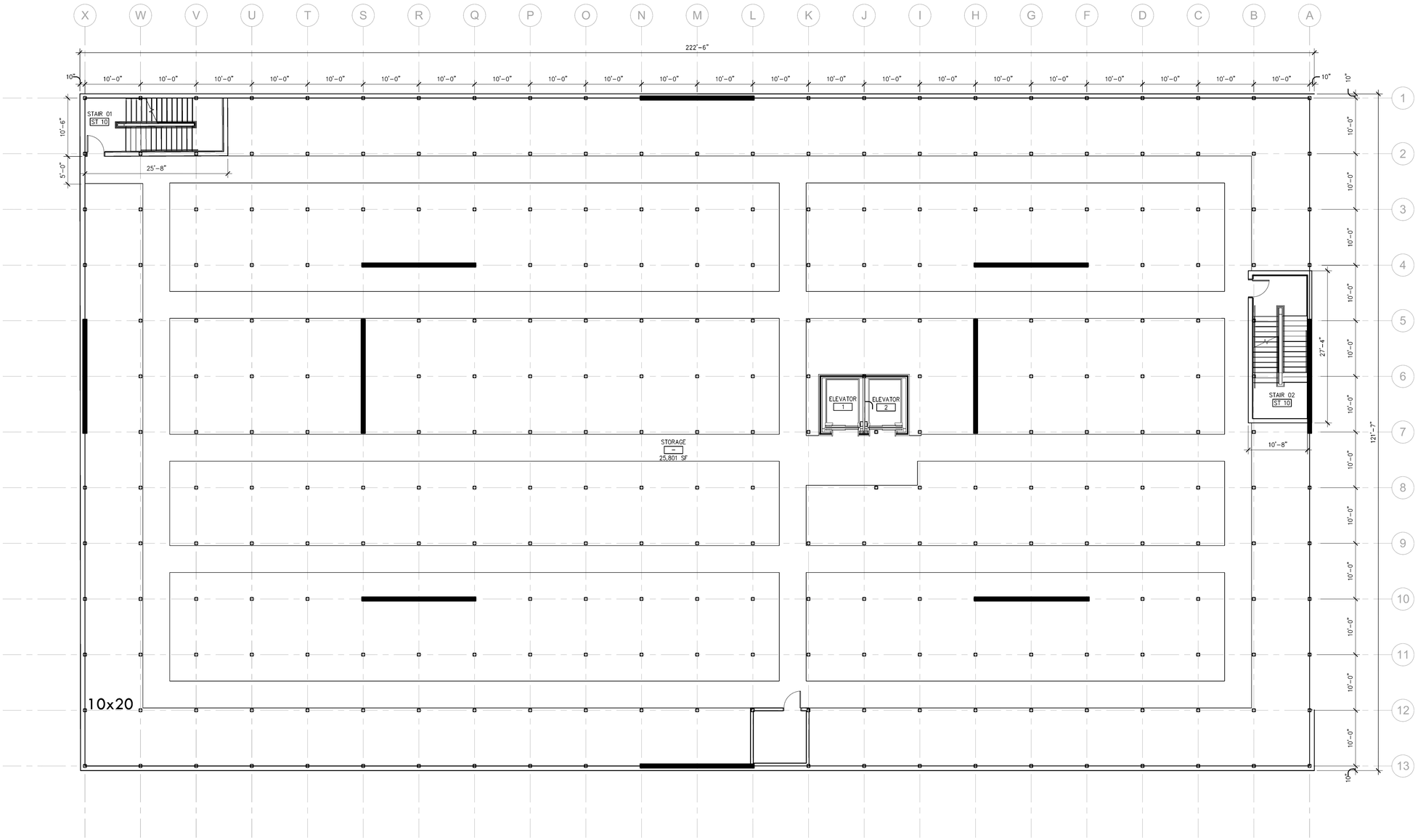
09/09/2025

SHEET
AD.1



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1/8" = 1'-0"
0 4' 8' 16' 32'

NORTH

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Basement Floor Plan

PUBLIC STORAGE
12681 West Jefferson Boulevard, Los Angeles, California 90066

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09/09/2025

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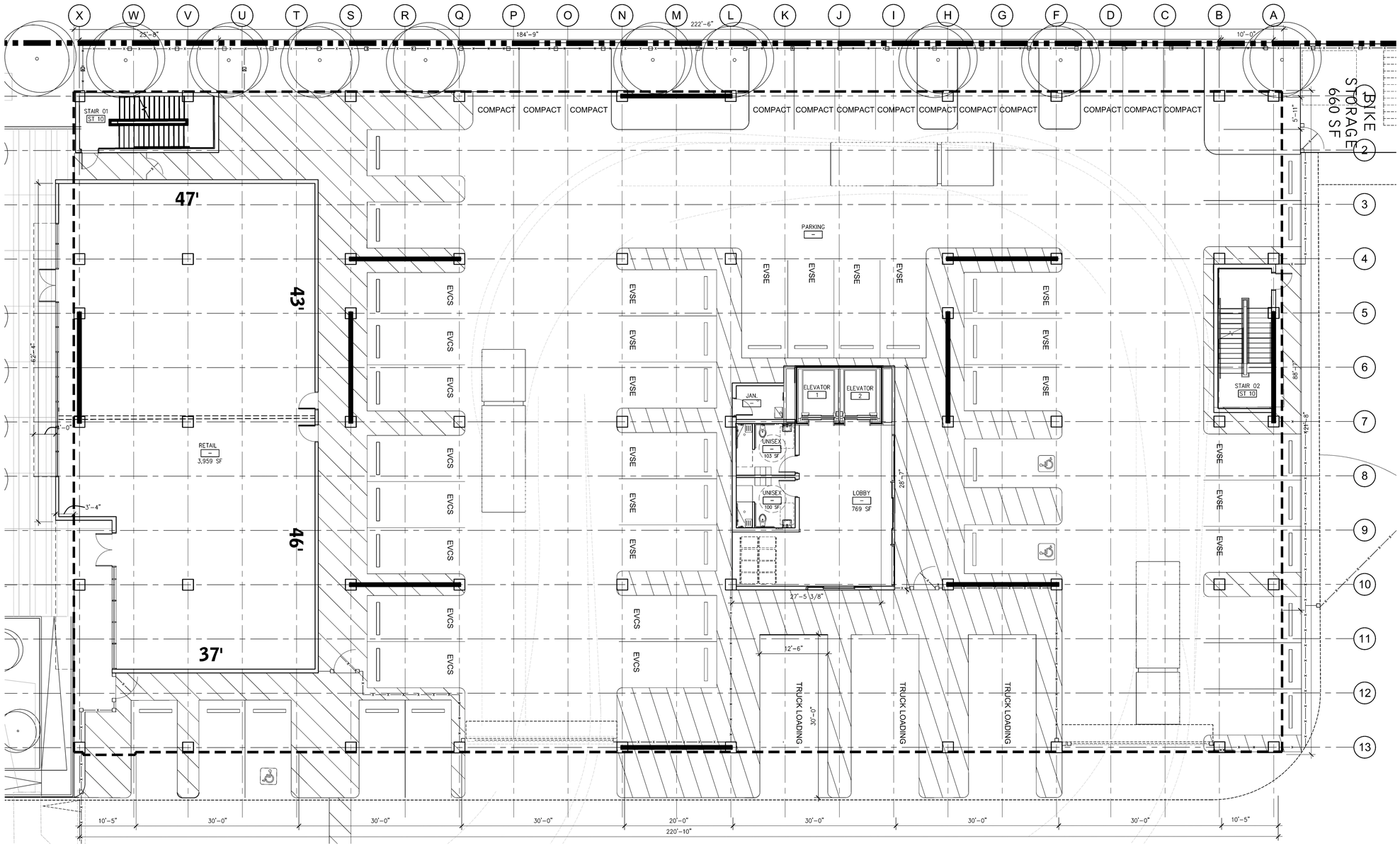

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Ground Floor Plan

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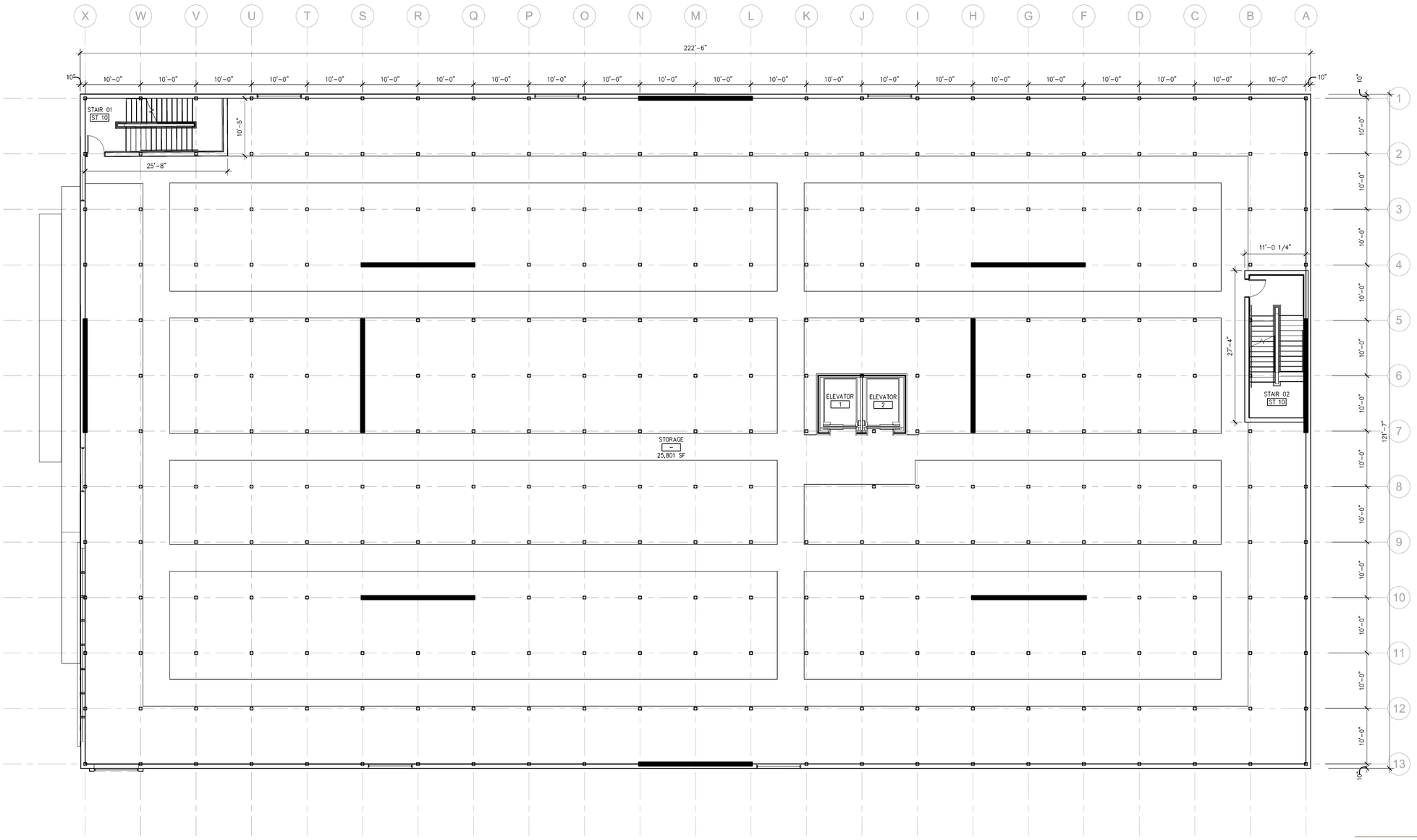

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Level 2 Floor Plan

PUBLIC STORAGE
12681 West Jefferson Boulevard, Los Angeles, California 90066

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09/09/2025

SHEET
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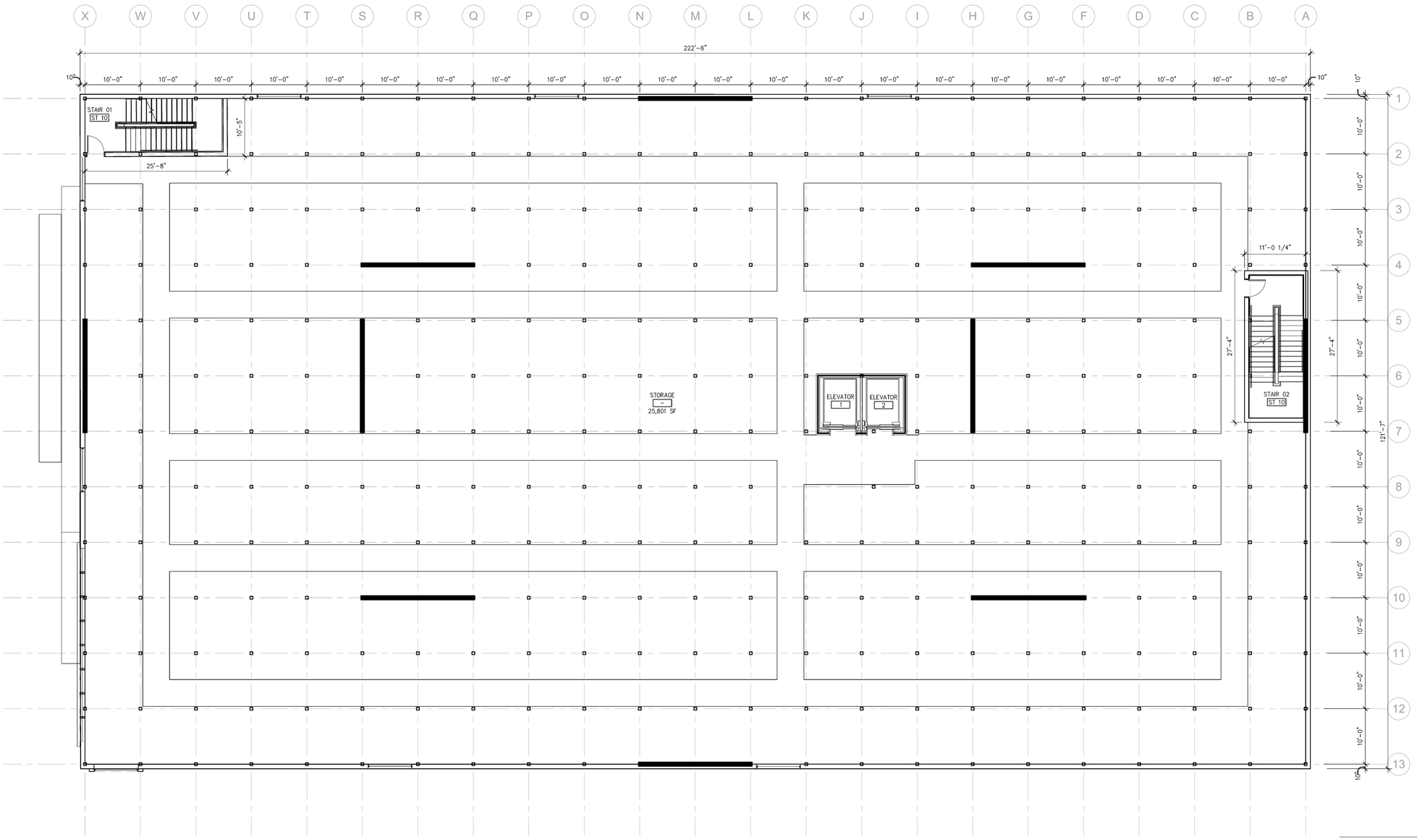

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Level 3 Floor Plan

PUBLIC STORAGE
12681 West Jefferson Boulevard, Los Angeles, California 90066

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09/09/2025

SHEET
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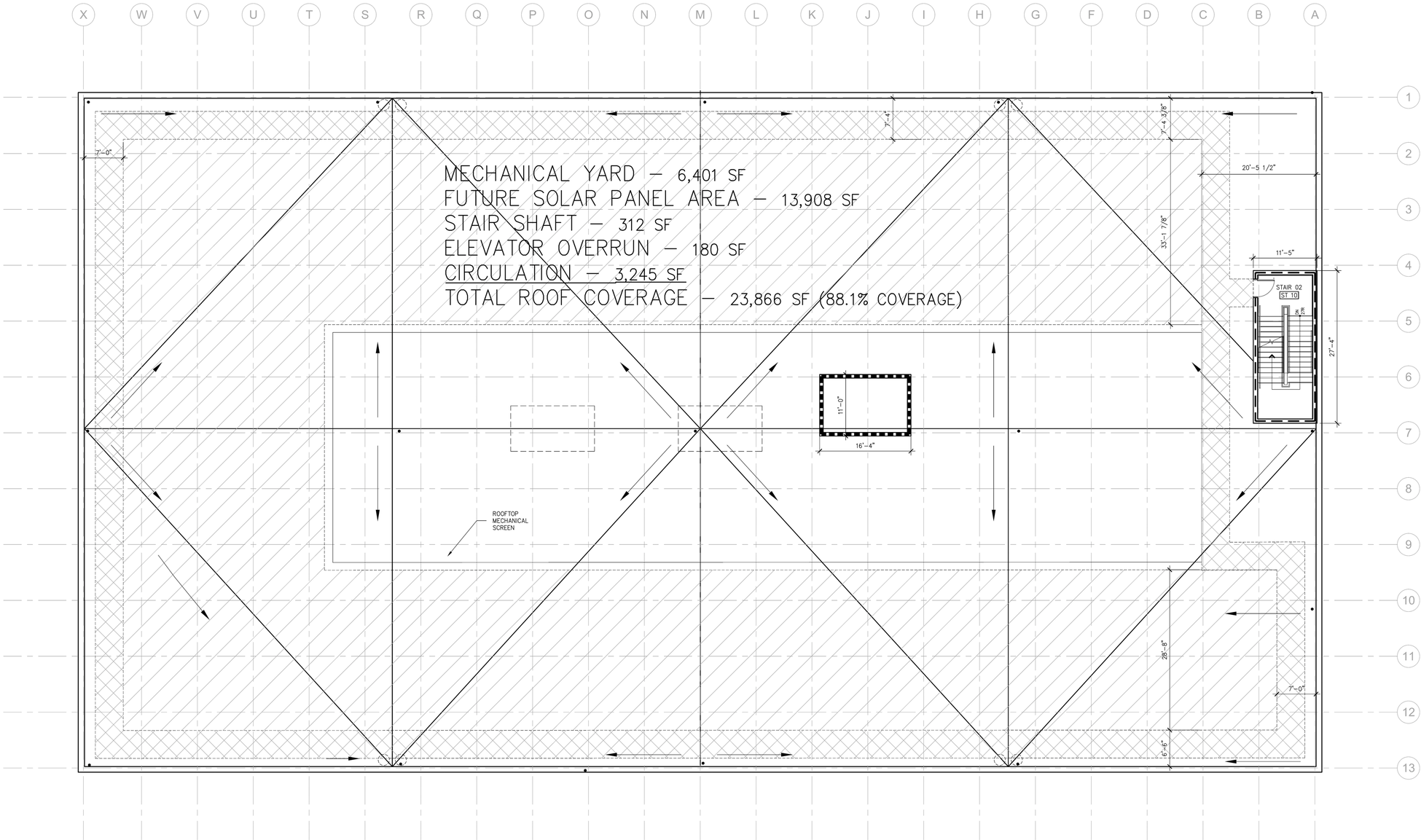

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Roof Lower Level Plan

PUBLIC STORAGE
12681 West Jefferson Boulevard, Los Angeles, California 90066

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09/09/2025

SHEET
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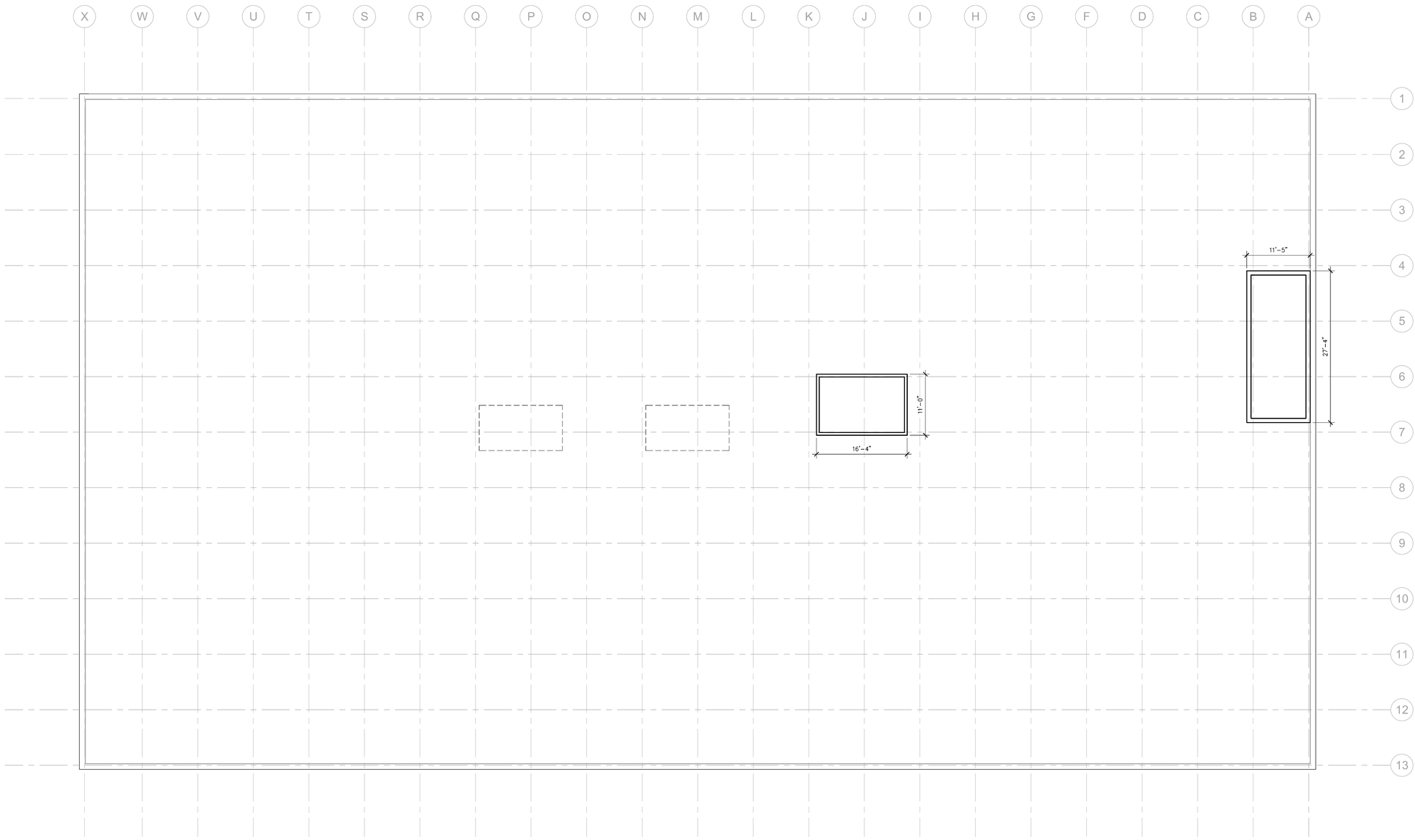

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Roof Upper Level Plan

PUBLIC STORAGE
12681 West Jefferson Boulevard, Los Angeles, California 90066

WARE MALCOMB

09/09/2025

SHEET
A3.2


Public Storage
TENANT SIGNAGE



CONCEPTUAL RENDERING

PUBLIC STORAGE

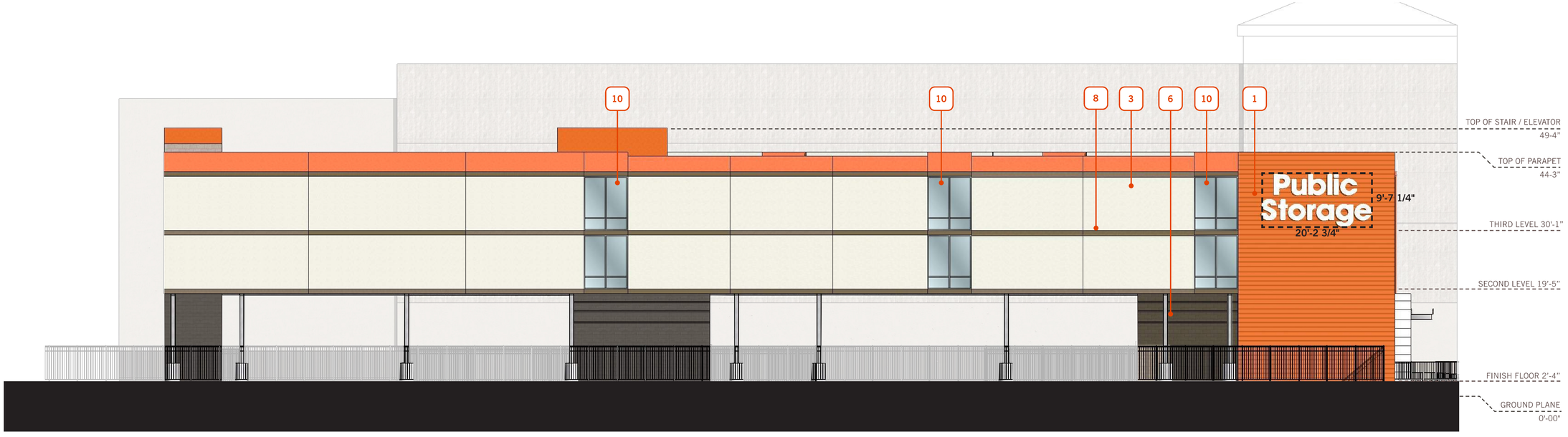
12681 WEST JEFFERSON BOULEVARD-LOS ANGELES, CALIFORNIA - LAX18-0019-00

WARE MALCOMB

09/09/2025



SOUTH ELEVATION - SCALE 1/8" = 1'-0"



WEST ELEVATION - SCALE 1/8" = 1'-0"

KEYNOTES

1 **MORIN METAL PANEL SYSTEM**
PAINTED: PUBLIC STORAGE ORANGE

2 **CLEAR ANODIZED STOREFRONT SYSTEM**

3 **EXTERIOR INSULATION AND FINISH SYSTYM (EIFS)**
PAINTED: WINTER MOOD, PPG14-16

4 **METAL COMPOSITE PANEL**
ALUCOBOND, PURE WHITE - RVW

5 **SITECAST CONCRETE**

6 **CONCRETE MASONRY WALL**
ANGELUS BLOCK, PLACER CREEK

7 **EXTERIOR INSULATION AND FINISH SYSTYM (EIFS)**
PAINTED: PUBLIC STORAGE ORANGE

8 **EXTERIOR INSULATION AND FINISH SYSTYM (EIFS)**
PAINTED: ROLLER COASTER, PPG1008-5

9 **TENANT SIGNAGE**

10 **SPANDREL GLASS**

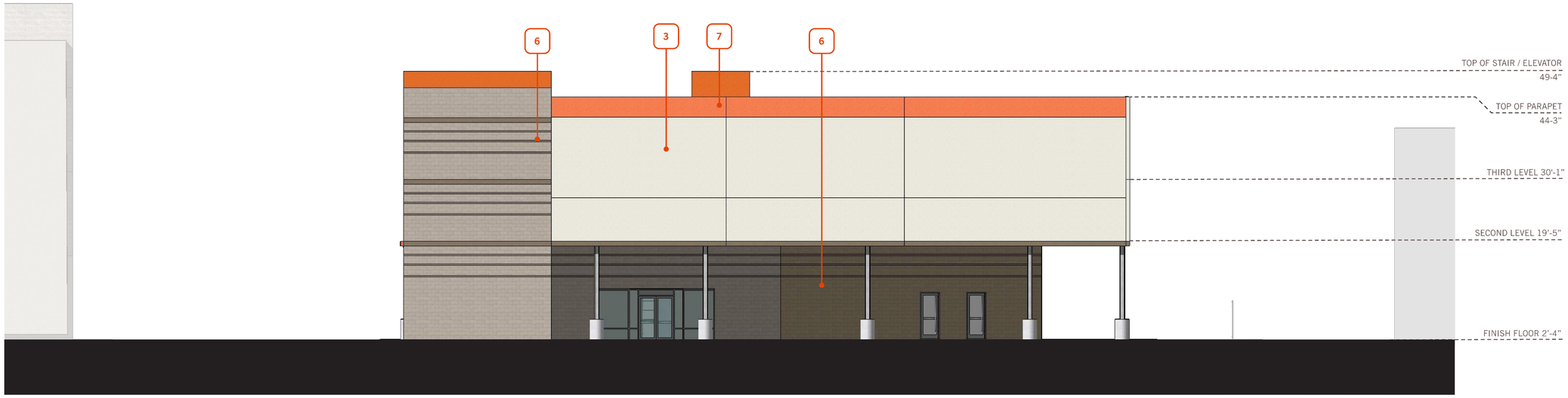
Public Storage

ELEVATIONS

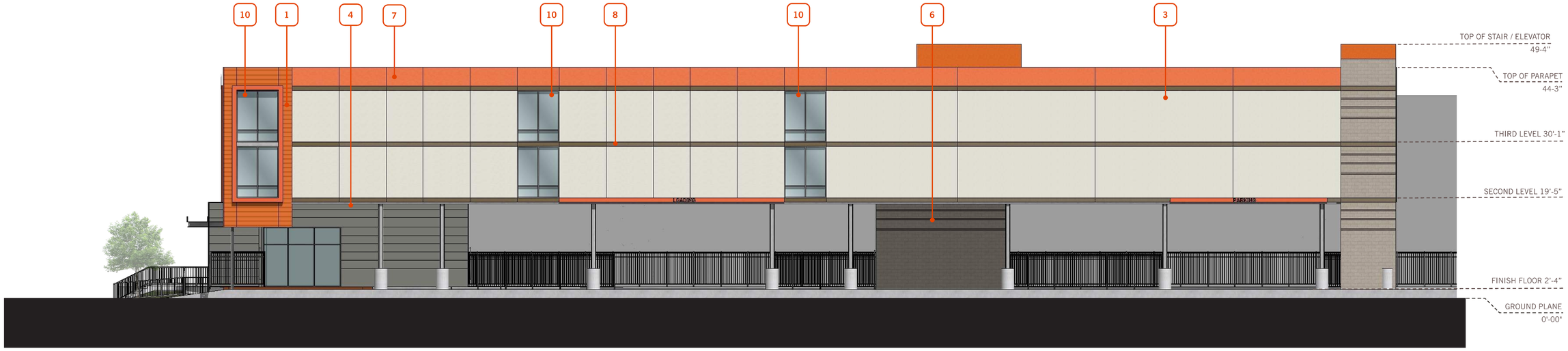
PUBLIC STORAGE
12681 WEST JEFFERSON BOULEVARD-LOS ANGELES, CALIFORNIA - LAX18-0019-00

WARE MALCOMB

09/09/2025



NORTH ELEVATION - SCALE 1/8" = 1'-0"



EAST ELEVATION - SCALE 1/8" = 1'-0"

KEYNOTES

1. **MORIN METAL PANEL SYSTEM**
   PAINTED: PUBLIC STORAGE ORANGE
2. **CLEAR ANODIZED STOREFRONT SYSTEM**
3. **EXTERIOR INSULATION AND FINISH SYSTYM (EIFS)**
   PAINTED: WINTER MOOD, PPG14-16
4. **METAL COMPOSITE PANEL**
   ALUCOBOND, PURE WHITE - RVW
5. **SITECAST CONCRETE**
6. **CONCRETE MASONRY WALL**
   ANGELUS BLOCK, PLACER CREEK
7. **EXTERIOR INSULATION AND FINISH SYSTYM (EIFS)**
   PAINTED: PUBLIC STORAGE ORANGE
8. **EXTERIOR INSULATION AND FINISH SYSTYM (EIFS)**
   PAINTED: ROLLER COASTER, PPG1008-5
9. **TENANT SIGNAGE**
10. **SPANDREL GLASS**

Public Storage

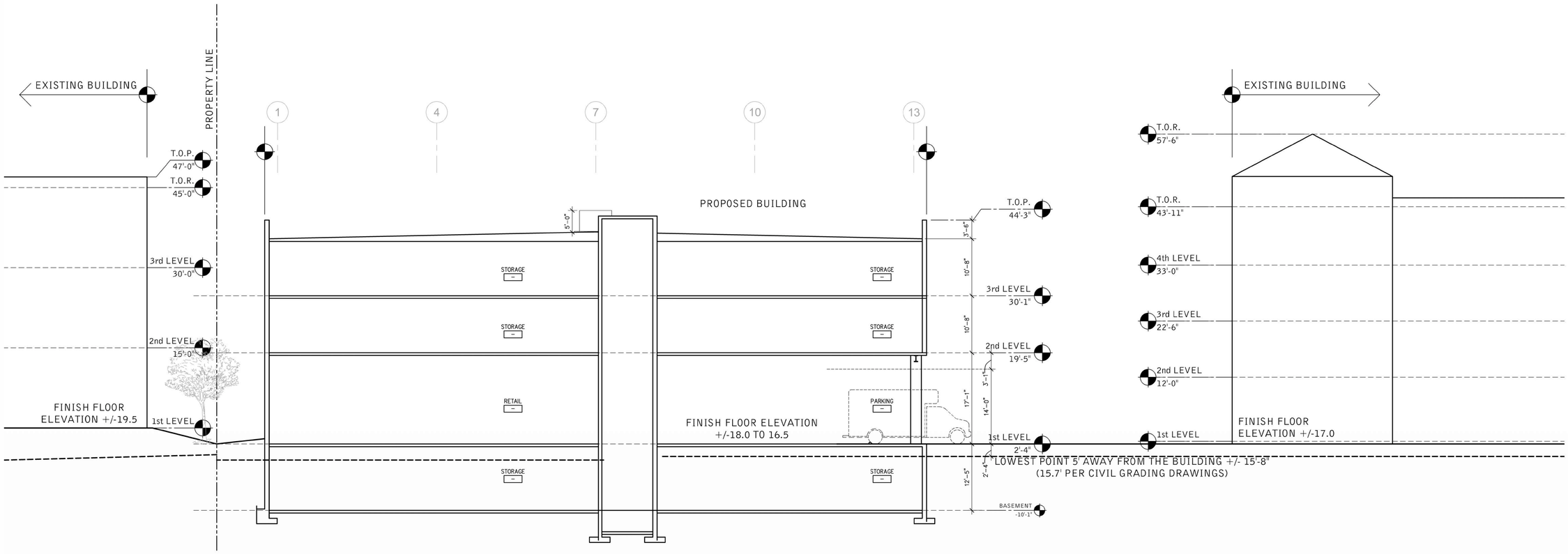
ELEVATIONS

PUBLIC STORAGE

12681 WEST JEFFERSON BOULEVARD-LOS ANGELES, CALIFORNIA - LAX18-0019-00

WARE MALCOMB

09/09/2025



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1/8" = 1'-0"

0 4' 8' 16' 32'

Public Storage

This conceptual design is based upon a preliminary review of entitlement requirements and on unverified and possibly incomplete site and/or building information, and is intended merely to assist in exploring how the project might be developed. Signage shown is for illustrative purposes only and does not necessarily reflect municipal code compliance.

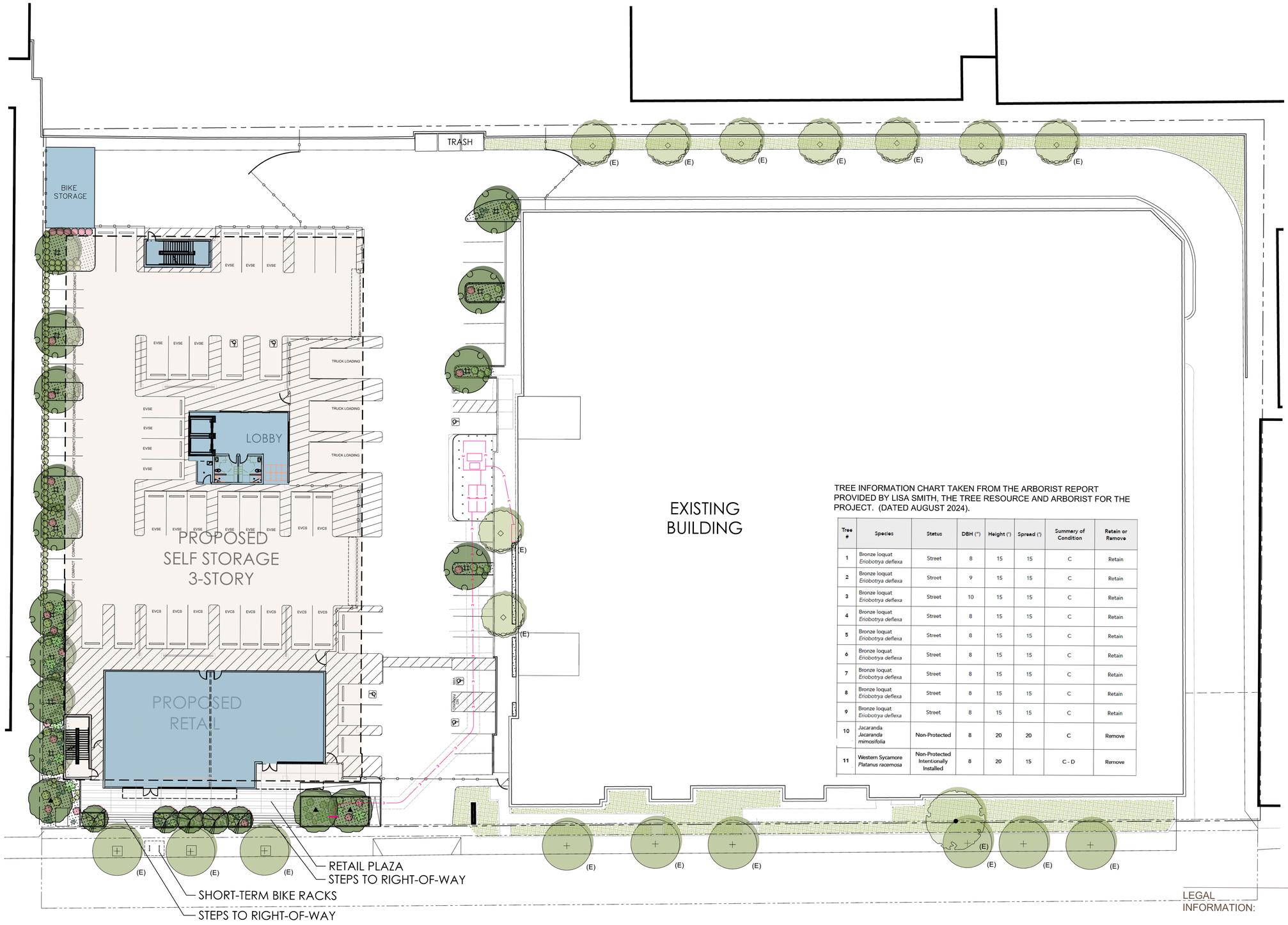
Building Section

PUBLIC STORAGE
12681 West Jefferson Boulevard, Los Angeles, California 90066

WARE MALCOMB

09/09/2025

SHEET
A5.1



TREE INFORMATION CHART TAKEN FROM THE ARBORIST REPORT PROVIDED BY LISA SMITH, THE TREE RESOURCE AND ARBORIST FOR THE PROJECT. (DATED AUGUST 2024).

Tree #	Species	Status	DBH (")	Height (')	Spread (')	Summary of Condition	Retain or Remove
1	Bronze loquat *Eriobotrya deflexa*	Street	8	15	15	C	Retain
2	Bronze loquat *Eriobotrya deflexa*	Street	9	15	15	C	Retain
3	Bronze loquat *Eriobotrya deflexa*	Street	10	15	15	C	Retain
4	Bronze loquat *Eriobotrya deflexa*	Street	8	15	15	C	Retain
5	Bronze loquat *Eriobotrya deflexa*	Street	8	15	15	C	Retain
6	Bronze loquat *Eriobotrya deflexa*	Street	8	15	15	C	Retain
7	Bronze loquat *Eriobotrya deflexa*	Street	8	15	15	C	Retain
8	Bronze loquat *Eriobotrya deflexa*	Street	8	15	15	C	Retain
9	Bronze loquat *Eriobotrya deflexa*	Street	8	15	15	C	Retain
10	Jacaranda *Jacaranda mimosifolia*	Non-Protected	8	20	20	C	Remove
11	Western Sycamore *Platanus racemosa*	Non-Protected Intentionally Installed	8	20	15	C - D	Remove

PRELIMINARY PLANTING LEGEND

SYMBOL	BOTANICAL / COMMON NAME	SIZE	QUANTITY
PROPOSED TREES			
	LAGERSTROEMIA INDICA / CRAPE MYRTLE	36" BOX STANDARD FORM	3
	CERCIS OCCIDENTALIS / WESTERN REDBUD	24" BOX STANDARD FORM	5
	TRISTANIA CONFERTA / BRISBANE BOX OR ELAEOCARPUS DECIPIENS / JAPANESE BLUEBERRY	24" BOX STANDARD FORM	13

SYMBOL	BOTANICAL / COMMON NAME	SIZE
PROPOSED SHRUBS AND GROUNDCOVER		
	AGAVE BLUE GLOW / BLUE GLOW AGAVE	1 GAL / 30" O.C.
	AGAVE DESMETTIANA / SMOOTH AGAVE	1 GAL / 42" O.C.
	ALOE ARBORESCENS / CANDELABRA ALOE	1 GAL / 42" O.C.
	BOUGAINVILLEA 'BARBARA KARST' / BARBARA KARST BOUGAINVILLEA	5 GAL / 42" O.C.
	BULBINE F. 'TINY TANGERINE' / TINY TANGERINE BULBINE	1 GAL / 30" O.C.
	CARISSA 'GREEN CARPET' / GREEN CARPET NATAL PLUM	1 GAL / 36" O.C.
	DIANELLA T. 'SILVER STREAK' / SILVER STREAK FLAX LILY	1 GAL / 36" O.C.
	MUHLENBERGIA CAPILLARIS / PINK MUHLY	1 GAL / 24" O.C.
	PHORMIUM ATROPURPUREUM / NEW ZEALAND FLAX	5 GAL / 36" O.C.
	YUCCA 'GOLDEN SWORD' / GOLDEN SWORD YUCCA	1 GAL / 30" O.C.

(ADDITIONAL PLANT MATERIAL MAY BE ADDED TO THE ABOVE LIST DURING THE PRELIMINARY PHASE OR CONSTRUCTION DOCUMENT PHASE TO REFINE PROPOSED PLANT PALETTE)

EXISTING PLANTING LEGEND

SYMBOL	BOTANICAL / COMMON NAME	COMMENTS	QUANTITY
EXISTING TREES			
(E)	GINKGO BILOBA / GINKGO TREE	EXISTING TREE	9
(E)	PARKINSONIA ACULEATA / MEXICAN PALO VERDE	EXISTING TREE	1
(E)	ERIOBOTRYA DEFLEXA / BRONZE LOQUAT	EXISTING STREET TREE	9

PROTECTED TREES WITHIN THE CITY OF LOS ANGELES:
- *QUERCUS LOBATA* / VALLEY OAK
- *QUERCUS AGRIFOLIA* / CALIFORNIA LIVE OAK

OR
- ANY OTHER TREE OF THE OAK GENUS INDIGENOUS TO SOUTHERN CALIFORNIA BUT EXCLUDING *QUERCUS BERBERIDIFOLIA* / SCRUB OAK
- *JUGLANS CALIFORNICA* / CALIFORNIA BLACK WALNUT
- *PLATANUS RACEMOSA* / WESTERN SYCAMORE
- *UMBELLULARIA CALIFORNICA* / CALIFORNIA BAY LAUREL

PROTECTED SHRUBS:
- *SAMBUCUS MEXICANA* / MEXICAN ELDERBERRY
- *HETEROMELES ARBUTIFOLIA* / TOYON

NOTE: PROTECTED TREES AND SHRUBS DO NOT OCCUR ON THE PROJECT SITE.

2926.4 SF OF PROPOSED LANDSCAPE AREA FOR PROPOSED BUILDING

Colleen M. Nolan
Landscape Architect, #5439
cnolan@cox.net
13355 Silverado Court, Corona 92883
714.743.7915 cell

LEGAL INFORMATION:

APN:	4211-005-017, 4211-009-025, 4211-009-028
ZONING:	M2-1
LOT:	FR-28
BROCK:	(NONE)
TRACT:	TR-30549
DEEDS:	4114, 315027, 286359, 2319, 1546122, 1427372, 1417881PR

SCALE: 1/16" = 1'-0"
1' 0 16' 32' 64'
NORTH

Public Storage

Preliminary Landscape Plan

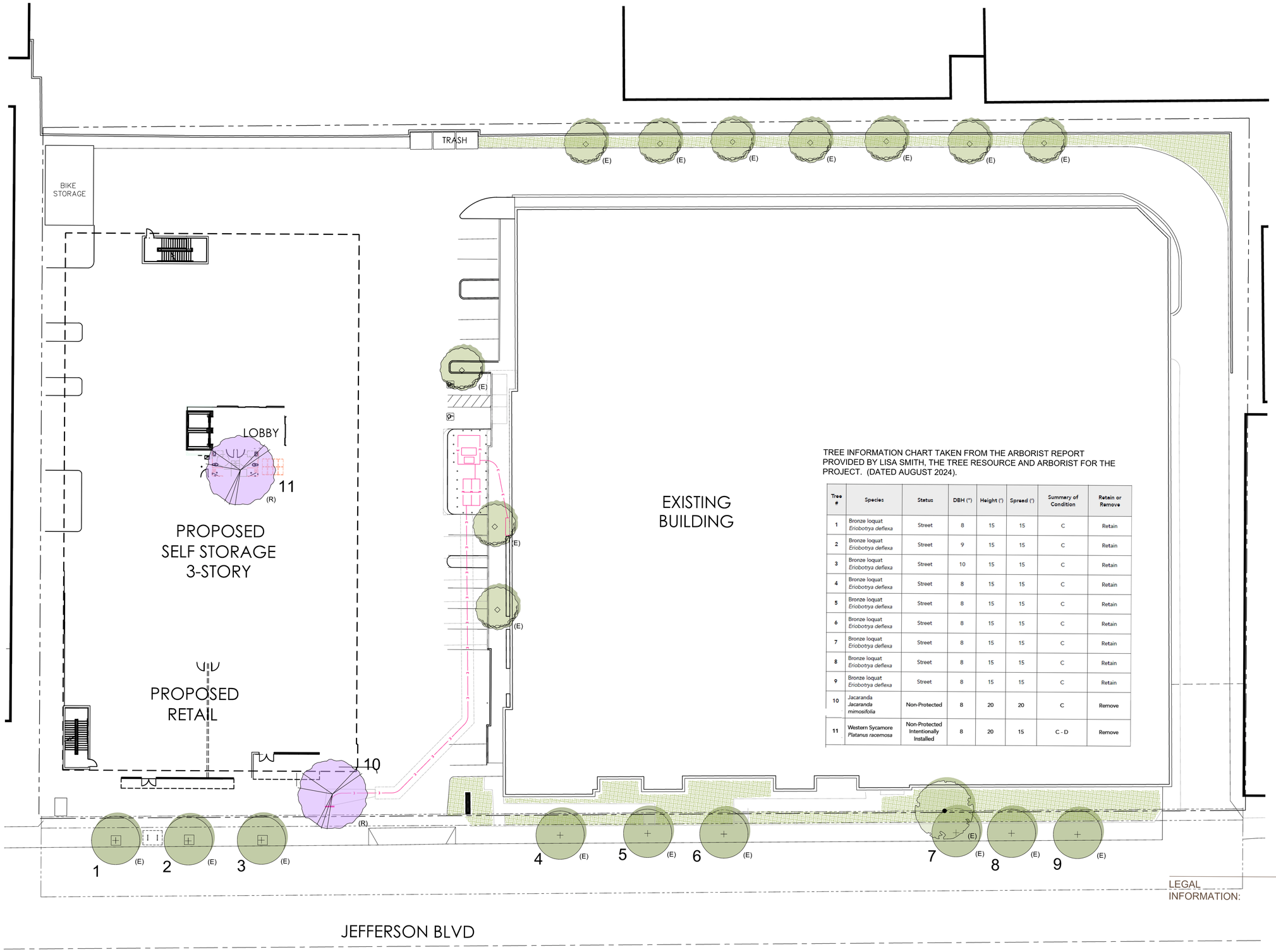
PUBLIC STORAGE
12681 West Jefferson Boulevard, Los Angeles, Califronia 90066

09/10/2025

WARE MALCOMB

JOB NO.: LAX18-0019-00
PA/PM: C. NOLAN

SHEET L1.1



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EXISTING TREES		
(E)	GINKGO BILOBA / GINKGO TREE	EXISTING TREE
(E)	PARKINSONIA ACULEATA / MEXICAN PALO VERDE	EXISTING TREE
(E)	ERIOBOTRYA DEFLEXA / BRONZE LOQUAT	EXISTING STREET TREE
(R)	JACARANDA MIMOSIFOLIA / JACARANDA	EXISTING TREE TO BE REMOVED (NOT PROTECTED)

PROTECTED TREES WITHIN THE CITY OF LOS ANGELES:
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- *QUERCUS AGRIFOLIA* / CALIFORNIA LIVE OAK

OR

-ANY OTHER TREE OF THE OAK GENUS INDIGENOUS TO SOUTHERN CALIFORNIA BUT EXCLUDING *QUERCUS BERBERIDIFOLIA* / SCRUB OAK
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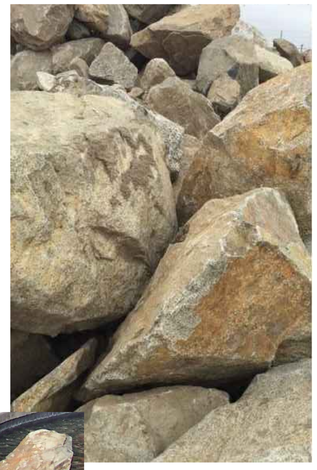
09/10/2025

WARE MALCOMB

JOB NO.: LAX18-0019-00
PA/PM: C. NOLAN

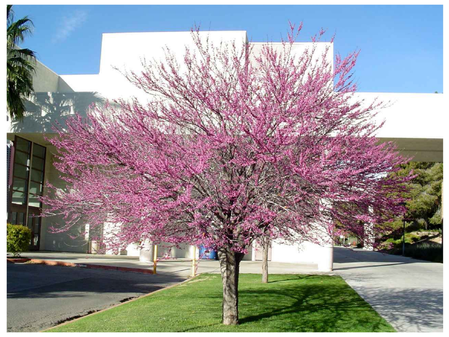
SHEET L1.2





LANDSCAPE BOULDERS

TREES



CERCIS OCCIDENTALIS /
WESTERN REDBUD



TRISTANIA CONFERTA /
BRISBANE BOX



LAGERSTROEMIA I. 'TUSKEGEE' /
TUSKEGEE CRAPE MYRTLE



ELAEOCARPUS DECIPIENS /
JAPANESE BLUEBERRY

SHRUBS / GROUNDCOVER



BULBINE F. 'TINY TANGERINE' /
TINY TANGERINE BULBINE



CARISSA 'GREEN CARPET' /
GREEN CARPET NATAL PLUM



DIANELLA 'SILVER STREAK' /
SILVER STREAK DIANELLA



SALVIA GREGII /
AUTUMN SAGE

DEFENSIVE SHRUBS



BOUGAINVILLEA 'BARBARA KARST' /
BARBARA KARST BOUGAINVILLEA



YUCCA 'GOLDEN SWORD' /
GOLDEN SWORD YUCCA



AGAVE BLUE GLOW /
BLUE GLOW AGAVE



AGAVE DESMETTIANA /
SMOOTH AGAVE



ALOE ARBORESCENS /
CANDELABRA ALOE



MUHLENBERGIA CAPILLARIS /
PINK MUHLY



PHORMIUM ATROPURPUREUM /
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	TRACT:	TR-30549
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Public Storage

Plant Photos

PUBLIC STORAGE
12681 West Jefferson Boulevard, Los Angeles, Califronia 90066

09/10/2025

WARE MALCOMB

JOB NO.: LAX18-0019-00
PA/PM: C. NOLAN

SHEET
L2

EXHIBIT B

MAPS, ZIMAS PARCEL PROFILE REPORT, SITE PHOTOS

CPC-2024-115-GPA-ZC-HD-CU-ZAA-SPR



VICINITY MAP

12681 JEFFERSON BLVD.
LOS ANGELES, CA 90066

APN: 4211-005-017, 4211-009-025, 4211-009-028

City of Los Angeles
Department of City Planning

9/10/2025
PARCEL PROFILE REPORT

PROPERTY ADDRESSES

None

ZIP CODES

None

RECENT ACTIVITY

None

CASE NUMBERS

CPC-2024-115-GPA-ZC-HD-CU-ZAA-SPR
CPC-2018-7547-CPU
CPC-2014-1456-SP
CPC-2005-8252-CA
CPC-19XX-21162
CPC-1999-536-SPR
CPC-1984-226
CPC-12116
ORD-186104
ORD-168999
ORD-136247
DIR-2005-1806-SPR
ZA-2018-6890-CU-ZV-SPR
ZA-2014-1211-CUW
AA-2000-3862-PMLA
ENV-2024-116-MND
ENV-2018-6891-MND
ENV-2014-1458-EIR-SE-CE
ENV-2014-1212-MND
ENV-2005-8253-ND
ENV-2005-1807-CE
MND-99-423-SPR
FG

Address/Legal Information	
PIN Number	102B161 14
Lot/Parcel Area (Calculated)	86,104.4 (sq ft)
Thomas Brothers Grid	PAGE 672 - GRID E7
Assessor Parcel No. (APN)	4211005017
Tract	TR 30549
Map Reference	M B 779-67/70
Block	None
Lot	FR 28
Arb (Lot Cut Reference)	None
Map Sheet	105B161
	102B161
Jurisdictional Information	
Community Plan Area	Palms - Mar Vista - Del Rey
Area Planning Commission	West Los Angeles APC
Neighborhood Council	Del Rey
Council District	CD 11 - Traci Park
Census Tract #	2756.05000000
LADBS District Office	West Los Angeles
Permitting and Zoning Compliance Information	
Administrative Review	None
Planning and Zoning Information	
Special Notes	None
Zoning	M2-1
Zoning Information (ZI)	ZI-2517 Al Fresco Ordinance within Planning Overlay and/or the Coastal Zone (Ordinance 188073)
	ZI-1874 Specific Plan: Los Angeles Coastal Transportation Corridor
	ZI-2452 Transit Priority Area in the City of Los Angeles
	ZI-2498 Local Emergency Temporary Regulations - Time Limits and Parking Relief - LAMC 16.02.1
General Plan Land Use	Light Manufacturing
General Plan Note(s)	Yes
Minimum Density Requirement	No
Hillside Area (Zoning Code)	No
Specific Plan Area	LOS ANGELES COASTAL TRANSPORTATION CORRIDOR
Subarea	None
Special Land Use / Zoning	None
Historic Preservation Review	No
HistoricPlacesLA	No
Historic Preservation Overlay Zone	None
Other Historic Designations	None
Mills Act Contract	None
CDO: Community Design Overlay	None
CPIO: Community Plan Imp. Overlay	None
Subarea	None
CPIO Historic Preservation Review	No
CUGU: Clean Up-Green Up	None
HCR: Hillside Construction Regulation	No

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NSO: Neighborhood Stabilization Overlay	No
POD: Pedestrian Oriented Districts	None
RBP: Restaurant Beverage Program Eligible Area	General (RBPA)
ASP: Alcohol Sales Program	No
RFA: Residential Floor Area District	None
RIO: River Implementation Overlay	No
SN: Sign District	No
AB 2334: Low Vehicle Travel Area	Yes
AB 2097: Within a half mile of a Major Transit Stop	Yes
Streetscape	No
Adaptive Reuse Incentive Area	None
Affordable Housing Linkage Fee	
Residential Market Area	High
Non-Residential Market Area	High
Inclusionary Housing	No
Local Affordable Housing Incentive	No
Targeted Planting	No
Special Lot Line	No
Transit Oriented Communities (TOC)	Tier 1
Mixed Income Incentive Programs	
Transit Oriented Incentive Area (TOIA)	Not Eligible
Opportunity Corridors Incentive Area	Not Eligible
Corridor Transition Incentive Area	Not Eligible
TCAC Opportunity Area	Highest
High Quality Transit Corridor (within 1/2 mile)	Yes
ED 1 Eligibility	Not Eligible
RPA: Redevelopment Project Area	None
Central City Parking	No
Downtown Parking	No
Building Line	None
500 Ft School Zone	None
500 Ft Park Zone	None
Zanja System 1 Mile Buffer	No
Assessor Information	
Assessor Parcel No. (APN)	4211005017
Ownership (Assessor)	
Owner1	PUBLIC STORAGE PICKUP AND DELIVERY L P c/o DEPT PT CA 29141
Address	0 PO BOX 25025 GLENDALE CA 91201
Ownership (Bureau of Engineering, Land Records)	
Owner	PUBLIC STORAGE PICKUP & DELIVERY, L.P. ATTN: EVELYN L. HUBEL
Address	701 WESTERN AVE STE 200 GLENDALE CA 91201
APN Area (Co. Public Works)*	2.120 (ac)
Use Code	300V - Industrial - Industrial - Vacant Land
Assessed Land Val.	$6,464,760
Assessed Improvement Val.	$0
Last Owner Change	03/02/2000
Last Sale Amount	$8,000,000
Tax Rate Area	414
Deed Ref No. (City Clerk)	4114 315027

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	286359
	2319
	1546122
	1427372
	1417881PR
Building 1	No data for building 1
Building 2	No data for building 2
Building 3	No data for building 3
Building 4	No data for building 4
Building 5	No data for building 5
Rent Stabilization Ordinance (RSO)	No [APN: 4211005017]
Additional Information	
Airport Hazard	200' Height Limit Above Elevation 126
	250' Height Limit Above Elevation 126
Coastal Zone	None
Coastal Bluff Potential	No
Canyon Bluff Potential	No
Farmland	Area Not Mapped
Urban Agriculture Incentive Zone	YES
Very High Fire Hazard Severity Zone	No
Fire District No. 1	No
Flood Zone	Outside Flood Zone
Watercourse	No
Methane Hazard Site	Methane Zone
High Wind Velocity Areas	No
Special Grading Area (BOE Basic Grid Map A-13372)	No
Wells	None
Sea Level Rise Area	No
Oil Well Adjacency	No
Environmental	
Santa Monica Mountains Zone	No
Biological Resource Potential	None
Mountain Lion Potential	None
Monarch Butterfly Potential	No
300-Foot Habitat Buffer	No
County-Designated SEAs and CRAs	No
USFWS-designated CHAs	No
Wildland Urban Interface (WUI)	No
Criterion 1 Protected Areas for Wildlife (PAWs)	No
Seismic Hazards	
Active Fault Near-Source Zone	
Nearest Fault (Distance in km)	5.0179224
Nearest Fault (Name)	Newport - Inglewood Fault Zone (Onshore)
Region	Transverse Ranges and Los Angeles Basin
Fault Type	B
Slip Rate (mm/year)	1.00000000
Slip Geometry	Right Lateral - Strike Slip
Slip Type	Poorly Constrained
Down Dip Width (km)	13.00000000
Rupture Top	0.00000000
Rupture Bottom	13.00000000
Dip Angle (degrees)	90.00000000
Maximum Magnitude	7.10000000
Alquist-Priolo Fault Zone	No

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Landslide	No
Liquefaction	Yes
Preliminary Fault Rupture Study Area	None
Tsunami Hazard Area	No
Economic Development Areas	
Business Improvement District	None
Hubzone	None
Jobs and Economic Development Incentive Zone (JEDI)	None
Opportunity Zone	No
Promise Zone	None
State Enterprise Zone	None
Housing	
Rent Stabilization Ordinance (RSO)	No [APN: 4211005017]
Ellis Act Property	No
Just Cause For Eviction Ordinance (JCO)	No
Housing Crisis Act Replacement Review	Yes
Housing Element Sites	
HE Replacement Required	N/A
SB 166 Units	N/A
Housing Use within Prior 5 Years	No
Public Safety	
Police Information	
Bureau	West
Division / Station	Pacific
Reporting District	1463
Fire Information	
Bureau	West
Battallion	4
District / Fire Station	67
Red Flag Restricted Parking	No

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CASE SUMMARIES

Note: Information for case summaries is retrieved from the Planning Department's Plan Case Tracking System (PCTS) database.

Case Number:	CPC-2024-115-GPA-ZC-HD-CU-ZAA-SPR
Required Action(s):	GPA-GENERAL PLAN AMENDMENT
	ZC-ZONE CHANGE
	HD-HEIGHT DISTRICT
	CU-CONDITIONAL USE
	ZAA-AREA,HEIGHT,YARD,AND BLDG LINE ADJMNTS GT 20% (SLIGHT MODIFICATIONS)
	SPR-SITE PLAN REVIEW
Project Description(s):	Pursuant to LAMC Section 11.5.6, requesting a General Plan Amendment to revise Footnote No. 1 to permit a change from Height District 1 to Height District 2, and pursuant to LAMC Section 12.32, requesting a Height District Change to permit a change from Height District 1 to Height District 2 to permit the development of the site to the proposed FAR of 2.1:1, and pursuant to LAMC Section 12.24 W.50 and 12.24 S, requesting a Conditional Use Permit to allow for the storage of household goods and to permit a twenty percent modification to the required number of automobile spaces, and pursuant to LAMC Section 16.05, requesting a Site Plan Review to permit the development of a new three-story mixed use retail and warehouse building consisting of approximately 82,324 sf, and pursuant to LAMC Section 12.28, requesting a Zoning Administrator's Adjustment to permit the height of the mini-warehouse building in the M2 zone to 44'3" for the construction of a new 82,324 sf, 44'3" tall 3-story mixed-use building with 78,365 sf for warehouse use and 3,959 sf of ground-floor retail use with 76 automobile spaces and 64 bicycle spaces.
Case Number:	CPC-2018-7547-CPU
Required Action(s):	CPU-COMMUNITY PLAN UPDATE
Project Description(s):	ADOPT COMMUNITY PLAN POLICY DOCUMENT, GENERAL PLAN AMENDMENTS, AND ZONE CHANGES TO APPLY RE-CODE LA ZONING.
Case Number:	CPC-2014-1456-SP
Required Action(s):	SP-SPECIFIC PLAN (INCLUDING AMENDMENTS)
Project Description(s):	SPECIFIC PLAN AMENDMENT
Case Number:	CPC-2005-8252-CA
Required Action(s):	CA-CODE AMENDMENT
Project Description(s):	AN ORDINANCE ESTABLISHING PERMANENT REGULATIONS IMPLEMENTING THE MELLO ACT IN THE COASTAL ZONE.
Case Number:	CPC-19XX-21162
Required Action(s):	Data Not Available
Project Description(s):	
Case Number:	CPC-1999-536-SPR
Required Action(s):	SPR-SITE PLAN REVIEW
Project Description(s):	SITE PLAN REVIEW FOR A PUBLIC STORAGE FACILITY.
Case Number:	CPC-1984-226
Required Action(s):	Data Not Available
Project Description(s):	AMENDMENT TO THE COASTAL TRANSPORTATION CORRIDOR SPECIFIC PLANTHE PROPERTY LOCATION IS GENERALLY BOUNDED ON THE EAST BY THE SAN DIEGO FWY; ON THE SOUTH BY THE CITY BOUNDARY OF THE CITY OFEL SEGUNDO; THE NORTH BY THE CITY BOUNDARY OF THE CITY OF SANTA MONICA AND ON THE WEST BY THE PACIFIC OCEAN PROPOSED PROJECT BROAD AMENDMENTS TO THE COASTAL TRANSPORTATION CORRIDOR SPECIFIC PLAN
Case Number:	DIR-2005-1806-SPR
Required Action(s):	SPR-SITE PLAN REVIEW
Project Description(s):	SITE PLAN REVIEW TO CONVERT 41,156 SF OF EXISTING WAREHOUSE INTO STORAGE AND EXPANSION OF STORAGE AREA ON TWO FLOORS. TOTAL: 82,312SF.
Case Number:	ZA-2018-6890-CU-ZV-SPR
Required Action(s):	CU-CONDITIONAL USE
	ZV-ZONE VARIANCE
	SPR-SITE PLAN REVIEW
Project Description(s):	PURSUANT TO 12.24 W 50, 12.24 F, AND 12.24 S A CONDITIONAL USE PERMIT FOR STORAGE OF HOUSEHOLD GOODS AND REDUCTION IN REQUIRED PARKING UP TO 20%, ZONE VARIANCE PURSUANT TO 12.27 TO INCREASE FLOOR AREA AND HEIGHT AND SITE PLAN REVIEW PURSUANT TO 16.05.
Case Number:	ZA-2014-1211-CUW
Required Action(s):	CUW-CONDITIONAL USE WIRELESS
Project Description(s):	CONDITIONAL USE FOR THE CONSTRUCTION AND OPERATION OF AN UNMANNED WIRELESS TELECOMMUNICATIONS ROOFTOP FACILITY CONSISTING OF 24 SCREENED ANTENNAS, 5 EQUIPMENT CABINETS, 1 MICROWAVE DISH, 1 GENERATOR (AT GRADE), AND VARIOUS SUPPORT EQUIPMENT. HEIGHT OF ANTENNA STRUCTURE AT 57'4" ON AN EXISTING BUILDING WITH A HEIGHT OF 61'10.
Case Number:	AA-2000-3862-PMLA
Required Action(s):	PMLA-PARCEL MAP
Project Description(s):	DIVIDE LOT INTO TWO PARCELS.

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Case Number:	ENV-2024-116-MND
Required Action(s):	MND-MITIGATED NEGATIVE DECLARATION
Project Description(s):	Pursuant to LAMC Section 11.5.6, requesting a General Plan Amendment to revise Footnote No. 1 to permit a change from Height District 1 to Height District 2, and pursuant to LAMC Section 12.32, requesting a Height District Change to permit a change from Height District 1 to Height District 2 to permit the development of the site to the proposed FAR of 2.1:1, and pursuant to LAMC Section 12.24 W.50 and 12.24 S, requesting a Conditional Use Permit to allow for the storage of household goods and to permit a twenty percent modification to the required number of automobile spaces, and pursuant to LAMC Section 16.05, requesting a Site Plan Review to permit the development of a new three-story mixed use retail and warehouse building consisting of approximately 82,324 sf, and pursuant to LAMC Section 12.28, requesting a Zoning Administrator's Adjustment to permit the height of the mini-warehouse building in the M2 zone to 44'3" for the construction of a new 82,324 sf, 44'3" tall 3-story mixed-use building with 78,365 sf for warehouse use and 3,959 sf of ground-floor retail use with 76 automobile spaces and 64 bicycle spaces.
Case Number:	ENV-2018-6891-MND
Required Action(s):	MND-MITIGATED NEGATIVE DECLARATION
Project Description(s):	PURSUANT TO 12.24 W 50, 12.24 F, AND 12.24 S A CONDITIONAL USE PERMIT FOR STORAGE OF HOUSEHOLD GOODS AND REDUCTION IN REQUIRED PARKING UP TO 20%, ZONE VARIANCE PURSUANT TO 12.27 TO INCREASE FLOOR AREA AND HEIGHT AND SITE PLAN REVIEW PURSUANT TO 16.05.
Case Number:	ENV-2014-1458-EIR-SE-CE
Required Action(s):	EIR-ENVIRONMENTAL IMPACT REPORT SE-STATUTORY EXEMPTIONS CE-CATEGORICAL EXEMPTION
Project Description(s):	ENVIRONMENTAL IMPACT REPORT
Case Number:	ENV-2014-1212-MND
Required Action(s):	MND-MITIGATED NEGATIVE DECLARATION
Project Description(s):	CONDITIONAL USE FOR THE CONSTRUCTION AND OPERATION OF AN UNMANNED WIRELESS TELECOMMUNICATIONS ROOFTOP FACILITY CONSISTING OF 24 SCREENED ANTENNAS, 5 EQUIPMENT CABINETS, 1 MICROWAVE DISH, 1 GENERATOR (AT GRADE), AND VARIOUS SUPPORT EQUIPMENT. HEIGHT OF ANTENNA STRUCTURE AT 57'4" ON AN EXISTING BUILDING WITH A HEIGHT OF 61'10.
Case Number:	ENV-2005-8253-ND
Required Action(s):	ND-NEGATIVE DECLARATION
Project Description(s):	AN ORDINANCE ESTABLISHING PERMANENT REGULATIONS IMPLEMENTING THE MELLO ACT IN THE COASTAL ZONE.
Case Number:	ENV-2005-1807-CE
Required Action(s):	CE-CATEGORICAL EXEMPTION
Project Description(s):	SITE PLAN REVIEW TO CONVERT 41,156 SF OF EXISTING WAREHOUSE INTO STORAGE AND EXPANSION OF STORAGE AREA ON TWO FLOORS. TOTAL: 82,312SF.
Case Number:	MND-99-423-SPR
Required Action(s):	SPR-SITE PLAN REVIEW
Project Description(s):	Data Not Available

DATA NOT AVAILABLE

CPC-12116

ORD-186104

ORD-168999

ORD-136247

FG

This report is subject to the terms and conditions as set forth on the website. For more details, please refer to the terms and conditions at zimas.lacity.org
(*) - APN Area is provided "as is" from the Los Angeles County's Public Works, Flood Control, Benefit Assessment.

ZIMAS INTRANET

LARIAC6 2020 Color-Ortho

09/10/2025

City of Los Angeles
Department of City Planning



Address: undefined
APN: 4211005017
PIN #: 102B161 14

Tract: TR 30549
Block: None
Lot: FR 28
Arb: None

Zoning: M2-1
General Plan: Light Manufacturing

N
W
E
S

LEGEND

GENERALIZED ZONING

- OS, GW
- A, RA
- RE, RS, R1, RU, RZ, RW1
- R2, RD, RMP, RW2, R3, RAS, R4, R5, PVSP
- CR, C1, C1.5, C2, C4, C5, CW, WC, ADP, LASED, CEC, USC, PPSP, MU, NMU
- CM, MR, CCS, UV, UI, UC, M1, M2, LAX, M3, SL, HJ, HR, NI
- P, PB
- PF

GENERAL PLAN LAND USE

LAND USE

RESIDENTIAL

- Minimum Residential
- Very Low / Very Low I Residential
- Very Low II Residential
- Low / Low I Residential
- Low II Residential
- Low Medium / Low Medium I Residential
- Low Medium II Residential
- Medium Residential
- High Medium Residential
- High Density Residential
- Very High Medium Residential

COMMERCIAL

- Limited Commercial
- Limited Commercial - Mixed Medium Residential
- Highway Oriented Commercial
- Highway Oriented and Limited Commercial
- Highway Oriented Commercial - Mixed Medium Residential
- Neighborhood Office Commercial
- Community Commercial
- Community Commercial -Mixed High Residential
- Regional Center Commercial

INDUSTRIAL

- Commercial Manufacturing
- Limited Manufacturing
- Light Manufacturing
- Heavy Manufacturing
- Hybrid Industrial

PARKING

- Parking Buffer

PORT OF LOS ANGELES

- General / Bulk Cargo - Non Hazardous (Industrial / Commercial)
- General / Bulk Cargo - Hazard
- Commercial Fishing
- Recreation and Commercial
- Intermodal Container Transfer Facility Site

LOS ANGELES INTERNATIONAL AIRPORT

- Airport Landside / Airport Landside Support
- Airport Airside
- LAX Airport Northside

OPEN SPACE / PUBLIC FACILITIES

- Open Space
- Public / Open Space
- Public / Quasi-Public Open Space
- Other Public Open Space
- Public Facilities

FRAMEWORK

COMMERCIAL

- Neighborhood Commercial
- General Commercial
- Community Commercial
- Regional Mixed Commercial

INDUSTRIAL

- Limited Industrial
- Light Industrial

CHAPTER 1A LEGEND

General Plan Designation

- Transit Core
- Traditional Core
- Regional Center
- High Residential
- Community Center
- Village
- Neighborhood Center
- Medium Neighborhood Residential
- Medium Residential
- Low Neighborhood Residential
- Low Medium Residential
- Low Residential
- Compact Residential
- Very Low Residential
- Minimum Residential
- Agriculture
- Hybrid Industrial
- Markets
- Light Industrial
- Production
- Industrial
- Open Space
- Public Facilities
- Public Facilities - Freeways

Zone Use Districts

- Open Space
- Agricultural
- Residential Single Family
- Residential Multiple Family
- Residential-Mixed
- Commercial
- Commercial-Mixed
- Industrial
- Industrial-Mixed
- Public
- Freeway

CIRCULATION

STREET

- Arterial Mountain Road
- Collector Scenic Street
- Collector Street
- Collector Street (Hillside)
- Collector Street (Modified)
- Collector Street (Proposed)
- Country Road
- Divided Major Highway II
- Divided Secondary Scenic Highway
- Local Scenic Road
- Local Street
- Major Highway (Modified)
- Major Highway I
- Major Highway II
- Major Highway II (Modified)
- Major Scenic Highway
- Major Scenic Highway (Modified)
- Major Scenic Highway II
- Mountain Collector Street
- Park Road
- Parkway
- Principal Major Highway
- Private Street
- Scenic Divided Major Highway II
- Scenic Park
- Scenic Parkway
- Secondary Highway
- Secondary Highway (Modified)
- Secondary Scenic Highway
- Special Collector Street
- Super Major Highway

FREEWAYS

- Freeway
- Interchange
- On-Ramp / Off- Ramp
- Railroad
- Scenic Freeway Highway

MISC. LINES

- Airport Boundary
- Bus Line
- Coastal Zone Boundary
- Coastline Boundary
- Collector Scenic Street (Proposed)
- Commercial Areas
- Commercial Center
- Community Redevelopment Project Area
- Country Road
- DWP Power Lines
- Desirable Open Space
- Detached Single Family House
- Endangered Ridgeline
- Equestrian and/or Hiking Trail
- Hiking Trail
- Historical Preservation
- Horsekeeping Area
- Local Street
- MSA Desirable Open Space
- Major Scenic Controls
- Multi-Purpose Trail
- Natural Resource Reserve
- Park Road
- Park Road (Proposed)
- Quasi-Public
- Rapid Transit Line
- Residential Planned Development
- Scenic Highway (Obsolete)
- Secondary Scenic Controls
- Secondary Scenic Highway (Proposed)
- Site Boundary
- Southern California Edison Power
- Special Study Area
- Specific Plan Area
- Stagecoach Line
- Wildlife Corridor

POINTS OF INTEREST

- Alternative Youth Hostel (Proposed)
- Animal Shelter
- Area Library
- Area Library (Proposed)
- Bridge
- Campground
- Campground (Proposed)
- Cemetery
- HW Church
- City Hall
- Community Center
- Community Library
- Community Library (Proposed Expansion)
- Community Library (Proposed)
- Community Park
- Community Park (Proposed Expansion)
- Community Park (Proposed)
- Community Transit Center
- Convalescent Hospital
- Correctional Facility
- Cultural / Historic Site (Proposed)
- Cultural / Historical Site
- Cultural Arts Center
- DMV DMV Office
- DWP DWP
- DWP Pumping Station
- Equestrian Center
- HQ Fire Department Headquarters
- Fire Station
- Fire Station (Proposed Expansion)
- Fire Station (Proposed)
- Fire Supply & Maintenance
- Fire Training Site
- Fireboat Station
- Health Center / Medical Facility
- Helistop
- Historic Monument
- Historical / Cultural Monument
- Horsekeeping Area
- Horsekeeping Area (Proposed)
- Horticultural Center
- Hospital
- Hospital (Proposed)
- HW House of Worship
- e Important Ecological Area
- e Important Ecological Area (Proposed)
- Interpretive Center (Proposed)
- JC Junior College
- M MTA / Metrolink Station
- M MTA Station
- MTA Stop
- MWD MWD Headquarters
- Maintenance Yard
- Municipal Office Building
- P Municipal Parking lot
- Neighborhood Park
- Neighborhood Park (Proposed Expansion)
- Neighborhood Park (Proposed)
- Oil Collection Center
- P Parking Enforcement
- HQ Police Headquarters
- Police Station
- Police Station (Proposed Expansion)
- Police Station (Proposed)
- Police Training site
- PO Post Office
- Power Distribution Station
- Power Distribution Station (Proposed)
- Power Receiving Station
- Power Receiving Station (Proposed)
- C Private College
- E Private Elementary School
- Private Golf Course
- Private Golf Course (Proposed)
- JH Private Junior High School
- PS Private Pre-School
- Private Recreation & Cultural Facility
- SH Private Senior High School
- SF Private Special School
- E Public Elementary (Proposed Expansion)
- E Public Elementary School
- E Public Elementary School (Proposed)
- Public Golf Course
- Public Golf Course (Proposed)
- Public Housing
- Public Housing (Proposed Expansion)
- JH Public Junior High School
- JH Public Junior High School (Proposed)
- MS Public Middle School
- SH Public Senior High School
- SH Public Senior High School (Proposed)
- Pumping Station
- Pumping Station (Proposed)
- Refuse Collection Center
- Regional Library
- Regional Library (Proposed Expansion)
- Regional Library (Proposed)
- Regional Park
- Regional Park (Proposed)
- RPD Residential Plan Development
- Scenic View Site
- Scenic View Site (Proposed)
- ADM School District Headquarters
- SC School Unspecified Loc/Type (Proposed)
- Skill Center
- SS Social Services
- Special Feature
- Special Recreation (a)
- SF Special School Facility
- SF Special School Facility (Proposed)
- Steam Plant
- sm Surface Mining
- Trail & Assembly Area
- Trail & Assembly Area (Proposed)
- UTL Utility Yard
- Water Tank Reservoir
- Wildlife Migration Corridor
- Wildlife Preserve Gate

SCHOOLS/PARKS WITH 500 FT. BUFFER

- Existing School/Park Site
- Planned School/Park Site
- Inside 500 Ft. Buffer

- Aquatic Facilities
- Beaches
- Child Care Centers
- Dog Parks
- Golf Course
- Historic Sites
- Horticulture/Gardens
- Skate Parks
- Other Facilities
- Park / Recreation Centers
- Parks
- Performing / Visual Arts Centers
- Recreation Centers
- Senior Citizen Centers
- Opportunity School
- Charter School
- Elementary School
- Span School
- Special Education School
- High School
- Middle School
- Early Education Center

COASTAL ZONE

- Coastal Commission Permit Area
- Dual Permit Jurisdiction Area
- Single Permit Jurisdiction Area
- Not in Coastal Zone

TRANSIT ORIENTED COMMUNITIES (TOC)

- Tier 1
- Tier 2
- Tier 3
- Tier 4

Note: TOC Tier designation and map layers are for reference purposes only. Eligible projects shall demonstrate compliance with Tier eligibility standards prior to the issuance of any permits or approvals. As transit service changes, eligible TOC Incentive Areas will be updated.

WAIVER OF DEDICATION OR IMPROVEMENT

- Public Work Approval (PWA)
- Waiver of Dedication or Improvement (WDI)

MIXED INCOME INCENTIVE PROGRAM (MIIP)

TRANSIT ORIENTED INCENTIVE AREAS (TOIA)

- T-1
- T-2
- T-3
- Outside of TOIA

OPPORTUNITY CORRIDORS (OC)

- OC-1
- OC-2
- OC-3

CORRIDOR TRANSITION INCENTIVE AREAS (CT)

- CT-1
- CT-2
- CT-3

OTHER SYMBOLS

- Lot Line
- Tract Line
- Lot Cut
- Easement
- Zone Boundary
- Building Line
- Lot Split
- Community Driveway
- Building Outlines 2020
- Building Outlines 2017
- Airport Hazard Zone
- Census Tract
- Coastal Zone
- Council District
- LADBS District Office
- Downtown Parking
- Fault Zone
- Fire District No. 1
- Tract Map
- Parcel Map
- Flood Zone
- Hazardous Waste
- High Wind Zone
- Hillside Grading
- Historic Preservation Overlay Zone
- Specific Plan Area
- Very High Fire Hazard Severity Zone
- Wells - Acitive
- Wells - Inactive

WARE MALCOMB

ARCHITECTURE | PLANNING | INTERIORS

BRANDING | CIVIL ENGINEERING

Photographs of Existing Conditions

12681 West Jefferson Boulevard
Los Angeles, California 90066



Site Aerial: 12681 West Jefferson Boulevard, Los Angeles, California 90066

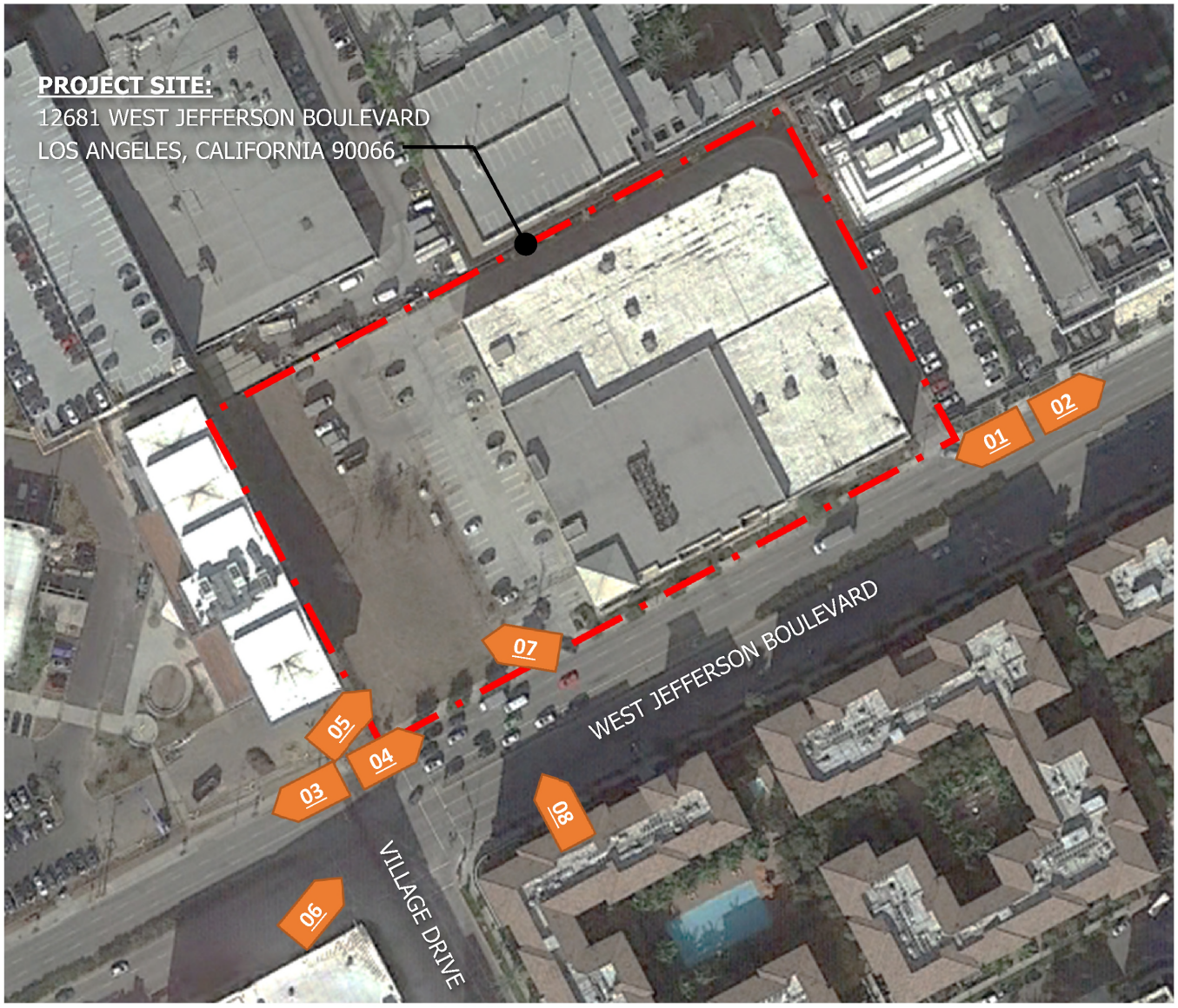


Photo Location Exhibit: 12681 West Jefferson Boulevard, Los Angeles, California 90066



Photo 01: View on W. Jefferson Blvd., looking south-west from north-east property corner.



Photo 02: View on W. Jefferson Blvd., looking north-east from north-east property corner.



Photo 03: View on W. Jefferson Blvd., looking south-west from south-west property corner.



Photo 04: View on W. Jefferson Blvd., looking north-east from south-west property corner.



Photo 05: View on W. Jefferson Blvd., looking north into project site.



Photo 06: View on W. Jefferson Blvd., looking north into project site.



Photo 07: View on W. Jefferson Blvd., looking east into project site.



Photo 08: View on W. Jefferson Blvd., looking directly into project site.

EXHIBIT C

AGENCY CORRESPONDENCE

C.1 – Bureau of Engineering

C.2 - Bureau of Street Services, Urban Forestry Division

C.3 – Bureau of Sanitation

C.4 – Department of Transportation

CPC-2024-115-GPA-ZC-HD-CU-ZAA-SPR

EXHIBIT C

AGENCY CORRESPONDENCE

C.1 – Bureau of Engineering

CPC-2024-115-GPA-ZC-HD-CU-ZAA-SPR

FORM GEN. 160 (Rev. 6-80)

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

Date: July 30, 2025

To: Vincent P. Bertoni, Director
Department of City Planning
Attn: Kenton Trinh (City Planner)

Michael Soto Digitally signed by Michael Soto Date: 2025.07.30 15:01:14-07'00'

From: Hui M. Huang, Principal Civil Engineer
Permit Case Management Division
Bureau of Engineering (BOE)

Subject: **Case No. CPC-2024-0115-GPA-ZC-HD-CU-ZAA-SPR (12681 West Jefferson Boulevard)**

The following recommendations identifying the infrastructure deficiencies adjacent to the above-referenced site. The recommendations are respectfully submitted for your consideration in the approval of a General Plan Amendment, Zone Change, Height District, Conditional Use Permit, Zoning Administrator Adjustment and Site Plan Review application:

1. Dedication Required:

   Jefferson Boulevard (Boulevard II) – Accept a 4-foot wide future street along the property frontage approximately 180 feet from the far most southwest end to the eastside of the existing driveway approach to complete a 12-foot wide border. (The east side frontage has a slope and no dedication will be required).

2. Improvements Required:

   Jefferson Boulevard – Remove and reconstruct the access ramp at the southwest end of the frontage to the current ADA compliant access ramp. Remove existing concrete sidewalk and construct full border width sidewalk abutting the new property line (12-foot wide where dedicated and 8-foot wide where not dedicated) for the entire frontage. Remove and replace existing curb and gutter, and any broken or uneven pavement along the entire property frontage satisfactory to the BOE - West Los Angeles District office.

   Notes: Broken curb and/or gutter includes segments within existing score lines that are depressed or upraised by more than ¼ inch from the surrounding concrete work or are separated from the main body of the concrete piece by a crack through the entire vertical segment and greater than 1/8 inch at the surface of the section.

Non-ADA compliant sidewalk shall include any sidewalk that has a cross slope that exceeds 2% and/or is depressed or upraised by more than ¼ inch from the surrounding concrete work or has full concrete depth cracks that have separations greater than 1/8 inch at the surface. The sidewalk also includes that portion of the pedestrian path of travel across a driveway.

All new sidewalk curb and gutter shall conform to the Bureau of Engineering Standard Plans S410-2, S440-4, S442-6 and S444-0.

Upgrade all existing curb ramps to comply with ADA requirements.

Install tree wells with root barriers and plant street trees satisfactory to the City Engineer and the Urban Forestry Division of the Bureau of Street Services. The applicant should contact the Urban Forestry Division for further information at https://engpermits.lacity.org/public or via https://appointments.lacity.org/apptsys/Public/Account.

Notes: Street lighting may be required satisfactory to the Bureau of Street Lighting at https://lalights.lacity.org or via https://appointments.lacity.org/apptsys/Public/Account.

Department of Transportation may have additional requirements for dedication and improvements.

Refer to the Department of Transportation regarding traffic signals, signs and equipment at (213) 485-1062 or via https://appointments.lacity.org/apptsys/Public/Account.

Regarding any conflicts with power pole matters, contact the Department of Water and Power at (213) 367-0562 or via https://appointments.lacity.org/apptsys/Public/Account.

Refer to the Fire Department Hydrants and Access Unit regarding fire hydrants at (213) 482-6543 or via https://appointments.lacity.org/apptsys/Public/Account.

3. Provide proper drainage for street being improved and for the site being developed.

4. Sewer lines exist in Jefferson Boulevard. Extension of the house connection lateral to the new property line may be required. All Sewerage Facilities Charges and Bonded Sewer Fees are to be paid prior to obtaining a building permit.

5. Submit a request to the West Los Angeles (WLA) District Office sewer counter to determine the capacity of the existing public sewer to accommodate the

proposed development at https://engpermits.lacity.org/public or via https://appointments.lacity.org/apptsys/Public/Account.

6. Submit a parking area and driveway plan to the WLA District Office of the Bureau of Engineering and the Department of Transportation for review and approval.

Any questions regarding this report may be directed to the Bureau of Engineering Permit Case Management Division - Land Development Group, via the Customer Service Request system at https://dscsr.lacity.org/.

EXHIBIT C

AGENCY CORRESPONDENCE

C.2 - Bureau of Street Services, Urban Forestry Division

CPC-2024-115-GPA-ZC-HD-CU-ZAA-SPR

FORM GEN. 160 (Rev. 8-12)

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

DATE: April 19, 2024

TO: Theodore Irving, Deputy Advisory Agency
Department of City Planning

FROM: Bryan Ramirez, Street Tree Superintendent I
Bureau of Street Services, Urban Forestry Division

SUBJECT: **CPC-2024-115-GPA-ZC – 12681 W. JEFFERSON BLVD.**

In regard to your request for review of this case regarding Urban Forestry requirements, it is our recommendation that:

1. **STREET TREES**

a. Project shall preserve all healthy mature street trees whenever possible. All feasible alternatives in project design should be considered and implemented to retain healthy mature street trees. A permit is required for the removal of any street tree and shall be replaced 2:1 as approved by the Board of Public Works and Urban Forestry Division.

b. When street dedications are required and to the extent possible, the project shall provide larger planting areas for existing street trees to allow for growth and planting of larger stature street trees. This includes and is not limited to parkway installation and/or enlargement of tree wells and parkways.

c. Plant street trees at all feasible planting locations within dedicated streets as directed and required by the Bureau of Street Services, Urban Forestry Division. All tree plantings shall be installed to current tree planting standards when the City has previously been paid for tree plantings. The sub divider or contractor shall notify the Urban Forestry Division at: (213) 847-3077 upon completion of construction for tree planting direction and instructions.

Note: Removal of street trees requires approval from the Board of Public Works. All projects must have environmental (CEQA) documents that appropriately address any removal and replacement of street trees. Contact Urban Forestry Division at: (213) 847-3077 for tree removal permit information.

BR:djm

EXHIBIT C

AGENCY CORRESPONDENCE

C.3 – Bureau of Sanitation

CPC-2024-115-GPA-ZC-HD-CU-ZAA-SPR

FORM GEN. 160 (Rev. 8-12)

CITY OF LOS ANGELES

INTER-DEPARTMENTAL CORRESPONDENCE

DATE: March 7, 2024

TO: Vincent P.Bertoni, Director of Planning
Department of City Planning

Attn: Kenton Trinh, City Planner
Department of City Planning

FROM: Rowena Lau, Division Manager
Wastewater Engineering Services Division
LA Sanitation and Environment

SUBJECT: **PUBLIC STORAGE PLAYA VISTA REDEVELOPMENT PROJECT - FILING NOTIFICATION AND DISTRIBUTION**

This is in response to your January 26, 2024 letter that was received on March 6, 2024 requesting a review of the proposed mixed-use project located at 12681 W Jefferson Blvd, Los Angeles, CA 90066. The project will consist of warehouse and retail space. LA Sanitation has conducted a preliminary evaluation of the potential impacts to the wastewater and stormwater systems for the proposed project.

WASTEWATER REQUIREMENT

LA Sanitation, Wastewater Engineering Services Division (WESD) is charged with the task of evaluating the local sewer conditions and to determine if available wastewater capacity exists for future developments. The evaluation will determine cumulative capacity impacts and guide the planning process for any future sewer improvement projects needed to provide future capacity as the City grows and develops.

Projected Wastewater Discharges for the Proposed Project:

Type Description	Average Daily Flow per Type Description (GPD/UNIT)	Proposed No. of Units	Average Daily Flow (GPD)
Proposed			
Warehouse	30 GPD/1000 SQ.FT	78,365 SQ.FT	2,351
Retail	25 GPD/1000 SQ.FT	3,959 SQ.FT	99
Total			**2,450 GPD**

SEWER AVAILABILITY

The sewer infrastructure in the vicinity of the proposed project includes an existing 8-inch line on Jefferson Blvd. The sewage from the existing 8-inch line feeds into a 30-inch line on Jefferson Blvd before discharging into a 42-inch sewer line on Inglewood Blvd R/W then into the Pallona

Creek Pump. Figure 1 shows the details of the sewer system within the vicinity of the project. The current flow level (d/D) in the 8-inch line and the 30-inch line cannot be determined at this time without additional gauging.

The current approximate flow level (d/D) and the design capacities at d/D of 50% in the sewer system are as follows:

Pipe Diameter (in)	Pipe Location	Current Gauging d/D (%)	50% Design Capacity
8	Jefferson Blvd.	*	422,850 GPD
30	Jefferson Blvd.	*	2.75 MGD
42	Jefferson Blvd.	27	9.55 MGD
42	Jefferson Blvd.	25	9.55 MGD
42	Inglewood Blvd. R/W	Pallona Creek Pump	9.55 MGD

* No gauging available

Based on estimated flows it appears the sewer system might be able to accommodate the total flow for your proposed project. Further detailed gauging and evaluation will be needed as part of the permit process to identify a specific sewer connection point. If the public sewer lacks sufficient capacity, then the developer will be required to build sewer lines to a point in the sewer system with sufficient capacity. A final approval for sewer capacity and connection permit will be made at the time. Ultimately, this sewage flow will be conveyed to the Hyperion Water Reclamation Plant, which has sufficient capacity for the project.

All sanitary wastewater ejectors and fire tank overflow ejectors shall be designed, operated, and maintained as separate systems. All sanitary wastewater ejectors with ejection rates greater than 25 GPM shall be reviewed and must be approved by LASAN WESD staff prior to other City plan check approvals. Lateral connection of development shall adhere to Bureau of Engineering Sewer Design Manual Section F 480.

This response letter is not intended to address any potential utility conflicts associated with the wastewater or stormwater conveyance systems. Construction of any type near any wastewater or stormwater conveyance infrastructure in the public right of way, or in/near any conveyance easement must be evaluated separately.

If you have any questions, please call Than Win at (323) 342-6268 or email at than.win@lacity.org.

STORMWATER REQUIREMENTS

LA Sanitation, Stormwater Program is charged with the task of ensuring the implementation of the Municipal Stormwater Permit requirements within the City of Los Angeles. We anticipate the following requirements would apply for this project.

POST-CONSTRUCTION MITIGATION REQUIREMENTS

In accordance with the Municipal Separate Storm Sewer (MS4) National Pollutant Discharge Elimination System (NPDES) Permit (Order No. R4-2012-0175, NPDES No. CAS004001) and the City of Los Angeles Stormwater and Urban Runoff Pollution Control requirements (Chapter

VI, Article 4.4, of the Los Angeles Municipal Code), the Project shall comply with all mandatory provisions to the Stormwater Pollution Control Measures for Development Planning (also known as Low Impact Development [LID] Ordinance). Prior to issuance of grading or building permits, the applicant shall submit a LID Plan to the City of Los Angeles, Public Works, LA Sanitation, Stormwater Program for review and approval. The LID Plan shall be prepared consistent with the requirements of the Planning and Land Development Handbook for Low Impact Development.

Current regulations prioritize infiltration, capture/use, and then biofiltration as the preferred stormwater control measures. The relevant documents can be found at: www.lacitysan.org. It is advised that input regarding LID requirements be received in the preliminary design phases of the project from plan-checking staff. Additional information regarding LID requirements can be found at: www.lacitysan.org or by visiting the stormwater public counter at 201 N. Figueroa, 2nd Fl, Suite 280.

GREEN STREETS

The City is developing a Green Street Initiative that will require projects to implement Green Street elements in the parkway areas between the roadway and sidewalk of the public right-of-way to capture and retain stormwater and urban runoff to mitigate the impact of stormwater runoff and other environmental concerns. The goals of the Green Street elements are to improve the water quality of stormwater runoff, recharge local groundwater basins, improve air quality, reduce the heat island effect of street pavement, enhance pedestrian use of sidewalks, and encourage alternate means of transportation. The Green Street elements may include infiltration systems, biofiltration swales, and permeable pavements where stormwater can be easily directed from the streets into the parkways and can be implemented in conjunction with the LID requirements. Green Street standard plans can be found at: https://eng2.lacity.org/techdocs/stdplans/index.htm

CONSTRUCTION REQUIREMENTS

All construction sites are required to implement a minimum set of BMPs for erosion control, sediment control, non-stormwater management, and waste management. In addition, construction sites with active grading permits are required to prepare and implement a Wet Weather Erosion Control Plan during the rainy season between October 1 and April 15. Construction sites that disturb more than one-acre of land are subject to the NPDES Construction General Permit issued by the State of California, and are required to prepare, submit, and implement the Storm Water Pollution Prevention Plan (SWPPP).

If there are questions regarding the stormwater requirements, please call WPP's plan-checking counter at (213) 482-7066. WPD's plan-checking counter can also be visited at 201 N. Figueroa, 2nd Fl, Suite 280.

GROUNDWATER DEWATERING REUSE OPTIONS

The Los Angeles Department of Water and Power (LADWP) is charged with the task of supplying water and power to the residents and businesses in the City of Los Angeles. One of the sources of water includes groundwater. The majority of groundwater in the City of Los Angeles

is adjudicated, and the rights of which are owned and managed by various parties. Extraction of groundwater within the City from any depth by law requires metering and regular reporting to the appropriate Court-appointed Watermaster. LADWP facilitates this reporting process, and may assess and collect associated fees for the usage of the City's water rights. The party performing the dewatering should inform the property owners about the reporting requirement and associated usage fees.

On April 22, 2016 the City of Los Angeles Council passed Ordinance 184248 amending the City of Los Angeles Building Code, requiring developers to consider beneficial reuse of groundwater as a conservation measure and alternative to the common practice of discharging groundwater to the storm drain (SEC. 99.04.305.4). It reads as follows: "Where groundwater is being extracted and discharged, a system for onsite reuse of the groundwater, shall be developed and constructed. Alternatively, the groundwater may be discharged to the sewer."

Groundwater may be beneficially used as landscape irrigation, cooling tower make-up, and construction (dust control, concrete mixing, soil compaction, etc.). Different applications may require various levels of treatment ranging from chemical additives to filtration systems. When onsite reuse is not available the groundwater may be discharged to the sewer system. This allows the water to be potentially reused as recycled water once it has been treated at a water reclamation plant. If groundwater is discharged into the storm drain it offers no potential for reuse. The onsite beneficial reuse of groundwater can reduce or eliminate costs associated with sewer and storm drain permitting and monitoring. Opting for onsite reuse or discharge to the sewer system are the preferred methods for disposing of groundwater.

To help offset costs of water conservation and reuse systems, LADWP offers a Technical Assistance Program (TAP), which provides engineering and technical assistance for qualified projects. Financial incentives are also available. Currently, LADWP provides an incentive of $1.75 for every 1,000 gallons of water saved during the first two years of a five-year conservation project. Conservation projects that last 10 years are eligible to receive the incentive during the first four years. Other water conservation assistance programs may be available from the Metropolitan Water District of Southern California. To learn more about available water conservation assistance programs, please contact LADWP Rebate Programs 1-888-376-3314 and LADWP TAP 1-800-544-4498, selection "3".

For more information, related to beneficial reuse of groundwater, please contact Greg Reed, Manager of Water Rights and Groundwater Management, at (213)367-2117 or greg.reed@ladwp.com.

SOLID RESOURCE REQUIREMENTS

The City has a standard requirement that applies to all proposed residential developments of four or more units or where the addition of floor areas is 25 percent or more, and all other development projects where the addition of floor area is 30 percent or more. Such developments must set aside a recycling area or room for onsite recycling activities. For more details of this requirement, please contact LA Sanitation Solid Resources Recycling hotline 213-922-8300.

RL/TW: sa

Attachment: Figure 1 - Sewer Map

c: Julie Allen, LASAN
Michael Scaduto, LASAN
Spencer Yu, LASAN
Than Win, LASAN

EXHIBIT C

AGENCY CORRESPONDENCE

C.4 – Department of Transportation

CPC-2024-115-GPA-ZC-HD-CU-ZAA-SPR

CITY OF LOS ANGELES

INTER-DEPARTMENTAL CORRESPONDENCE

12681 West Jefferson Boulevard
DOT Case No. CTC18-107520

Date: February 13, 2024

To: Brenda Kahinju, Senior Administrative Clerk
Department of City Planning

From: Mohammad R. Hasan, Transportation Engineer
Department of Transportation

Subject: **TRAFFIC ASSESSMENT FOR THE PROPOSED PUBLIC STORAGE BUILDING EXPANSION PROJECT LOCATED AT 12681 WEST JEFFERSON BOULEVARD - SECOND UPDATE (ENV-2024-116-EAF/ CPC-2024-115-GPA-ZC-HD-CU-ZAA-SPR)**

*The Department of Transportation (DOT) issued traffic assessment letters for the expansion of the public storage building at 12681 West Jefferson Boulevard on December 20, 2020, and updated it on February 1, 2023, following Raju Associates, Inc.'s transportation analyses from October 30, 2018, and January 18, 2023, respectively. After the initial update, the applicant proposed further changes, leading to a second update in a technical memorandum by Raju Associates, Inc., dated January 31, 2024. This latest update suggests **a slight decrease** in trips compared to the first update and replaces the February 1, 2023, assessment letter. The previous letter is included as Attachment "A".*

The Department of Transportation (LADOT) has completed its review of the technical memorandum analysis report prepared by Raju Associates, Inc. dated January 31, 2024 for an update (second) to the proposed Public Storage facility expansion project located at 12681 West Jefferson Boulevard. After a review of the pertinent data, DOT has determined that the analysis conducted adequately describes the project-related impact of the proposed development.

In compliance with Senate Bill (SB) 743 and the California Environmental Quality Act (CEQA), a Vehicle Miles Traveled (VMT) analysis is required to identify the project's ability to promote the reduction of green-house gas emissions, the access to diverse land uses, and the development of multi-modal networks. The significance of a project's impact in this regard is measured against the VMT thresholds established in LADOT's Transportation Assessment Guidelines (TAG).

PROJECT DESCRIPTION

The updated plan includes a 3-story, 84,752 sq. ft. mini-warehouse, next to an existing Public Storage, reducing the size by 3,936 sq. ft. from the first update. It features 80,614 sq. ft. of storage (4,115 sq. ft. less than before) and 4,138 sq. ft. of retail space (179 sq. ft. more than before), totaling 297,198 sq. ft. of storage on site, 6,115 sq. ft. less than previously planned. The site plan is included as **Attachment B** to this letter. The completion (build-out) year has been revised from 2026 to 2028.

The site is located on the north side of Jefferson Boulevard between Westlawn Avenue and Village Drive in the Playa Vista area and is currently occupied by the Public Storage facility and the adjacent vacant lot. Access to the project site is proposed from an existing driveway on the north side of Jefferson Boulevard. The existing driveway already provides right-in and right-out access to the existing Public Storage facility and is intended to keep the same operation after the project is completed.

A total of 76 vehicle parking spaces (1 more than the first project update) and 64 bicycle spaces (same a the first project update) would be provided per the Los Angeles Municipal Code (LAMC) including 32 short-term and 32 long-term bicycle parking spaces.

DISCUSSION AND FINDINGS

Trip Generation

The applicant conducted a conservative trip generation analysis by utilizing both LADOT's VMT Calculator Tool and the Institute of Transportation Engineers (ITE) Trip Generation 11th Edition, 2021 to determine if the project screening would exceed the net 250 daily vehicle trips threshold requiring further transportation analysis. Since the LADOT VMT Calculator Tool (v1.3) is based on ITE 9th Edition trip generation rates, the resulting daily trips (based on ITE 11th Edition trip generation rates) for the existing use and proposed use were utilized in the LADOT VMT Calculator Tool using the custom land use feature. As indicated by the LADOT VMT Project Screening Criteria output page, provided as **Attachment "C"** to this letter, the project would result in a net total of approximately 101 daily trips (4 net daily trips lower than the previous first project update). For screening purposes, the project is estimated to generate a net increase of 117 daily trips (6 net daily trips lower than the previous first project update) using the rates published in the ITE 11th Edition and with the removal of the local serving retail use since the project's retail component is under 50,000 square feet. A copy of the trip generation table (Table 2) can be found in **Attachment "D"**.

Traffic Impact

LADOT concurs with the conclusion of the transportation analysis that the project trip generation still does not meet the trip threshold to warrant the requirement of a traffic impact analysis. Therefore, LADOT will not require the preparation of a traffic impact analysis for this project.

PROJECT REQUIREMENTS

To comply with transportation and mobility goals and provisions of adopted City Plans and ordinances, the applicant should be required to implement the following:

1. **Transportation Impact Assessment (TIA) Fee:**

   Pursuant to Section 1.D.2 of the Fee Ordinance No. 186105 as authorized by the Coastal Transportation Corridor Specific Plan (CTC SP) an applicant for a project within the Specific Plan area, except as exempted, shall pay, or guarantee payment of a TIA Fee prior to issuance of any building permit. Applicable fee rates are identified in the TIA Fee Table of the Fee Ordinance. The applicable fee for the proposed project has been determined as follows:

   Land Uses/ TIA fee Rates:
   Industrial Land Use + Retail Land Use

   Proposed Uses:
   Mini-Warehouse: (80,614 sq. ft./ 1,000 sq. ft.) * $4,480= **$361,151.00**
   Retail: (4,138 sq. ft. /1,000 sq. ft.) * $17,813= **$73,710.00**

   ESTIMATED TOTAL TIA fee = $434,861.00

Pursuant to Section 1.C.4 of the Fee Ordinance No. 186105 as authorized by the CTC SP, the Transportation Cost Factor shall be increased (or decreased) as of January 1 of each year by the amount of the percentage increase (or decrease) in the most recently available City Building Code Index, as determined by DOT. Therefore, **the actual TIA Fee may vary depending upon when payment is made to DOT**.

2. **Highway Dedication and Street Widening Requirements**

The applicant for the project has consulted with the City of Los Angeles Bureau of Engineering (BOE) regarding potential highway dedication or street widening requirements. Jefferson Boulevard currently provides a half right-of-way width (north side of street) of 50 feet along the Project's frontage. Per the BOE, the Project is required to provide a 5-foot dedication along the Project's frontage on Jefferson Boulevard, resulting in a half right-of-way width of 55 feet (for Boulevard II standard) consistent with the City of Los Angeles' Mobility Plan 2035. These requirements must be guaranteed before the issuance of any building permit through the B-permit process of the BOE. They must be constructed and completed prior to the issuance of any certificate of occupancy to the satisfaction of DOT and BOE.

3. **Project Access and Circulation**

The proposed site plan is acceptable to DOT; however, review of the study does not constitute approval of the driveway dimensions and internal circulation schemes. Those will require separate review and approval and should be coordinated with DOT's West LA/Coastal Development Review Section (7166 W. Manchester Avenue/ (213) 485 1062/ladot.devreview.wla@lacity.org). In order to minimize potential building design changes, the applicant should contact DOT for driveway width and internal circulation requirements so that such traffic flow considerations are designed and incorporated early into the building and parking layout plans. All truck loading and unloading should take place on site with no vehicles backing into the project from public streets via any of the project driveways.

4. **Development Review Fees**

Section 19.15 of the LAMC identifies specific fees paid to DOT for traffic study review, condition clearance, and permit issuance. The applicant shall comply with any applicable fees per this ordinance.

5. **Worksite Traffic Control Requirements**

DOT recommends that a construction work site traffic control plan be submitted to DOT's Citywide Temporary Traffic Control Section or Permit Plan Review Section for review and approval prior to the start of any construction work. Refer to https://ladot.lacity.gov/businesses/plan-review-checklists to determine which section to coordinate review of the work site traffic control plan. The plan should show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. DOT also recommends that all construction related truck traffic be restricted to off-peak hours to the extent feasible.

If you have any questions, please contact me or Pedro Ayala at (213) 485-1062.

Attachments

c: Jeff Khau, Council District No. 11
Milena Zasadzien, William Lamborn, DCP
Tim Fremaux, Rudy Guevara, DOT
Mike Patonai, Oscar Gutierrez BOE
Srinath Raju, Raju Associates, Inc.

Da FORM GEN. 160A (Rev. 1/82)

CITY OF LOS ANGELES

INTER-DEPARTMENTAL CORRESPONDENCE

Attachment "A" (1 of 6)

12681 W Jefferson Blvd: New Mini-Storage Bldg expansion, 2nd Update (CTC18-107520)

12681 West Jefferson Boulevard
DOT Case No. CTC18-107520

Date: February 1, 2023

To: Brenda Kahinju, Senior Administrative Clerk
Department of City Planning

From: Eduardo Hermoso, Transportation Engineering
Department of Transportation

Subject: **TRAFFIC ASSESSMENT FOR THE PROPOSED PUBLIC STORAGE BUILDING EXPANSION PROJECT LOCATED AT 12681 WEST JEFFERSON BOULEVARD**

The Department of Transportation (LADOT) has completed its review of the technical memorandum, and impact analysis report prepared by Raju Associates, Inc. dated December 6, 2022 with a subsequent revision submitted in January 18, 2023 for the proposed Public Storage expansion project located at 12681 West Jefferson Boulevard. After a review of the pertinent data, DOT has determined that the analysis conducted adequately describes the project-related impact of the proposed development.

In compliance with Senate Bill (SB) 743 and the California Environmental Quality Act (CEQA), a Vehicle Miles Traveled (VMT) analysis is required to identify the project's ability to promote the reduction of green-house gas emissions, the access to diverse land uses, and the development of multi-modal networks. The significance of a project's impact in this regard is measured against the VMT thresholds established in LADOT's Transportation Assessment Guidelines (TAG).

PROJECT DESCRIPTION

The project proposes the construction of a new, 88,688 sq. ft. mini-warehouse building in a vacant lot adjacent to an existing approximately 216,584 sq. ft., four story, Public Storage building. The mini-warehouse space will include 84,729 sq. ft. of storage use (for an overall site total of 303,313 sq. ft. of storage use) and 3,959 sq. ft. of ground-floor retail use. The project is anticipated to be completed in 2026.

The site is located on the north side of Jefferson Boulevard between Westlawn Avenue and Village Drive in the Playa Vista area and is currently occupied by the Public Storage facility and the adjacent vacant lot. Access to the project site is proposed from an existing driveway on the north side of Jefferson Boulevard. The existing driveway already provides right-in and right-out access to the existing Public Storage facility and is intended to keep the same operation after the project is completed.

A total of 75 vehicle parking spaces and 64 bicycle spaces would be provided per the Los Angeles Municipal Code (LAMC) including 32 short-term and 32 long-term bicycle parking spaces.

DISCUSSION AND FINDINGS

Trip Generation

The applicant conducted a conservative trip generation analysis by utilizing both LADOT's VMT

Calculator Tool and the Institute of Transportation Engineers (ITE) Trip Generation 11th Edition, 2021 to determine if the project would exceed the net 250 daily vehicle trips threshold requiring further transportation analysis. Since the LADOT VMT Calculator Tool (v1.3) is based on ITE 9th Edition trip generation rates, the resulting daily trips (based on ITE 11th Edition trip generation rates) for the existing use and proposed use were utilized in the LADOT VMT Calculator Tool using the custom land use feature. As indicated the LADOT VMT Screening Criteria section (included in **Attachment A**), the Project would result in a net total of approximately 105 daily trips. The project is estimated to generate a net increase of 123 daily trips, using the rates published in the ITE 11th Edition. A copy of the trip generation table (Table 2) can be found in **Attachment "B"**.

Traffic Impact

LADOT concurs with the conclusion of the transportation analysis that the project trip generation does not meet the trip threshold to require a traffic impact analysis. Therefore, LADOT will not require the preparation of a traffic impact analysis for this project.

PROJECT REQUIREMENTS

To comply with transportation and mobility goals and provisions of adopted City Plans and ordinances, the applicant should be required to implement the following:

1. **Transportation Impact Assessment (TIA) Fee:**

   Pursuant to Section 1.D.2 of the Fee Ordinance No. 186105 as authorized by the Coastal Transportation Corridor Specific Plan (CTC SP) an applicant for a project within the Specific Plan area, except as exempted, shall pay, or guarantee payment of a TIA Fee prior to issuance of any building permit. Applicable fee rates are identified in the TIA Fee Table of the Fee Ordinance. The applicable fee for the proposed project has been determined as follows:

   Land Uses/ TIA fee Rates:
   Industrial Land Use + Retail & Service Land Use

   Proposed Uses:
   Mini-Warehouse: (84,729 sq. ft.) * ($4,028/1,000 sq. ft.) = **$341,288.41**
   Retail: (3,959 sq. ft.) * ($16,016/1,000 sq. ft.) = **$63,407.34**

   TOTAL TIA fee = $404,695.75

   Pursuant to Section 1.C.4 of the Fee Ordinance No. 186105 as authorized by the CTC SP, the Transportation Cost Factor shall be increased (or decreased) as of January 1 of each year by the amount of the percentage increase (or decrease) in the most recently available City Building Code Index, as determined by DOT. Therefore, the actual TIA Fee may vary depending upon when payment is made to DOT.

2. **Highway Dedication and Street Widening Requirements**

   The applicant for the project shall consult the Bureau of Engineering (BOE) for any highway dedication or street widening requirements. These requirements must be guaranteed before the issuance of any building permit through the B-permit process of the BOE. They must be constructed and completed prior to the issuance of any certificate of occupancy to the

satisfaction of DOT and BOE.

3. **Development Review Fees**

   Section 19.15 of the LAMC identifies specific fees for traffic study review, condition clearance, and permit issuance. The applicant shall comply with any applicable fees per this ordinance

4. **Project Access and Circulation**

   The proposed site plan illustrated in **Attachment C** is acceptable to DOT; however, review of the study does not constitute approval of the driveway dimensions and internal circulation schemes. Those will require separate review and approval and should be coordinated with DOT's West LA/Coastal Development Review Section (7166 W Manchester Ave, @ 213-485-1062). In order to minimize potential building design changes, the applicant should contact DOT for driveway width and internal circulation requirements so that such traffic flow considerations are designed and incorporated early into the building and parking layout plans. All truck loading and unloading should take place on site with no vehicles backing into the project from public streets via any of the project driveways.

If you have any questions, please contact Joshua Jones at (213) 485-1062.

Attachments

c: Jeff Khau, Council District No. 11
Milena Zasadzien, William Lamborn, DCP
Tim Fremaux, Rudy Guevara, DOT
Mike Patonai, Oscar Gutierrez BOE
Srinath Raju, Raju Associates, Inc.

Attachment A

CITY OF LOS ANGELES VMT CALCULATOR Version 1.3

Project Screening Criteria: Is this project required to conduct a vehicle miles traveled analysis?

Project Information

Project: Public Storage Expansion Project (12681 W. Jefferson)

Scenario:

Address: 33.97896091660473, -118.41571240479549



Is the project replacing an existing number of residential units with a smaller number of residential units AND is located within one-half mile of a fixed-rail or fixed-guideway transit station?

● Yes ○ No

Existing Land Use

Land Use Type	Value	Unit
Industrial | Warehousing/Self-Storage	216.584	ksf
(custom) Mini-Warehouse (ITE 11th Ed) | Daily	314	Trips
(custom) Mini-Warehouse (ITE 11th Ed) | HBW	19	Percent
(custom) Mini-Warehouse (ITE 11th Ed) | HBO	41	Percent
(custom) Mini-Warehouse (ITE 11th Ed) | NHB	20	Percent
(custom) Mini-Warehouse (ITE 11th Ed) | HBW	0	Percent
(custom) Mini-Warehouse (ITE 11th Ed) | HBO	0	Percent
(custom) Mini-Warehouse (ITE 11th Ed) | NHB	20	Percent
(custom) Mini-Warehouse (ITE 11th Ed) | Daily	0	Residents
(custom) Mini-Warehouse (ITE 11th Ed) | Daily	71	Employees
(custom) Mini-Warehouse (ITE 11th Ed) | Daily	Non-Retai	Retail/Non-R

☑ Click here to add a single custom land use type (will be included in the above list)

Proposed Project Land Use

Land Use Type	Value	Unit
Industrial | Warehousing/Self-Storage	303.313	ksf
(custom) Mini-Warehouse (11th Ed) | Retail/No	Non-Retai	LU type
(custom) Mini-Warehouse (11th Ed) | Residen	0	Person
(custom) Mini-Warehouse (11th Ed) | Employe	99	Person
(custom) Mini-Warehouse (11th Ed) | Daily	437	Trips
(custom) Mini-Warehouse (11th Ed) | HBW-Att	19	Percent
(custom) Mini-Warehouse (11th Ed) | HBO-Att	41	Percent
(custom) Mini-Warehouse (11th Ed) | NHB-Attr	20	Percent
(custom) Mini-Warehouse (11th Ed) | HBW-Pro	0	Percent
(custom) Mini-Warehouse (11th Ed) | HBO-Pro	0	Percent
(custom) Mini-Warehouse (11th Ed) | NHB-Pro	20	Percent

☑ Click here to add a single custom land use type (will be included in the above list)

Project Screening Summary

Existing Land Use	Proposed Project
281 Daily Vehicle Trips	386 Daily Vehicle Trips
2,216 Daily VMT	3,042 Daily VMT

Tier 1 Screening Criteria

Project will have less residential units compared to existing residential units & is within one-half mile of a fixed-rail station. ☐

Tier 2 Screening Criteria

The net increase in daily trips < 250 trips	105 Net Daily Trips
The net increase in daily VMT ≤ 0	826 Net Daily VMT
The proposed project consists of only retail land uses ≤ 50,000 square feet total.	0.000 ksf

The proposed project is not required to perform VMT analysis.

Measuring the Miles

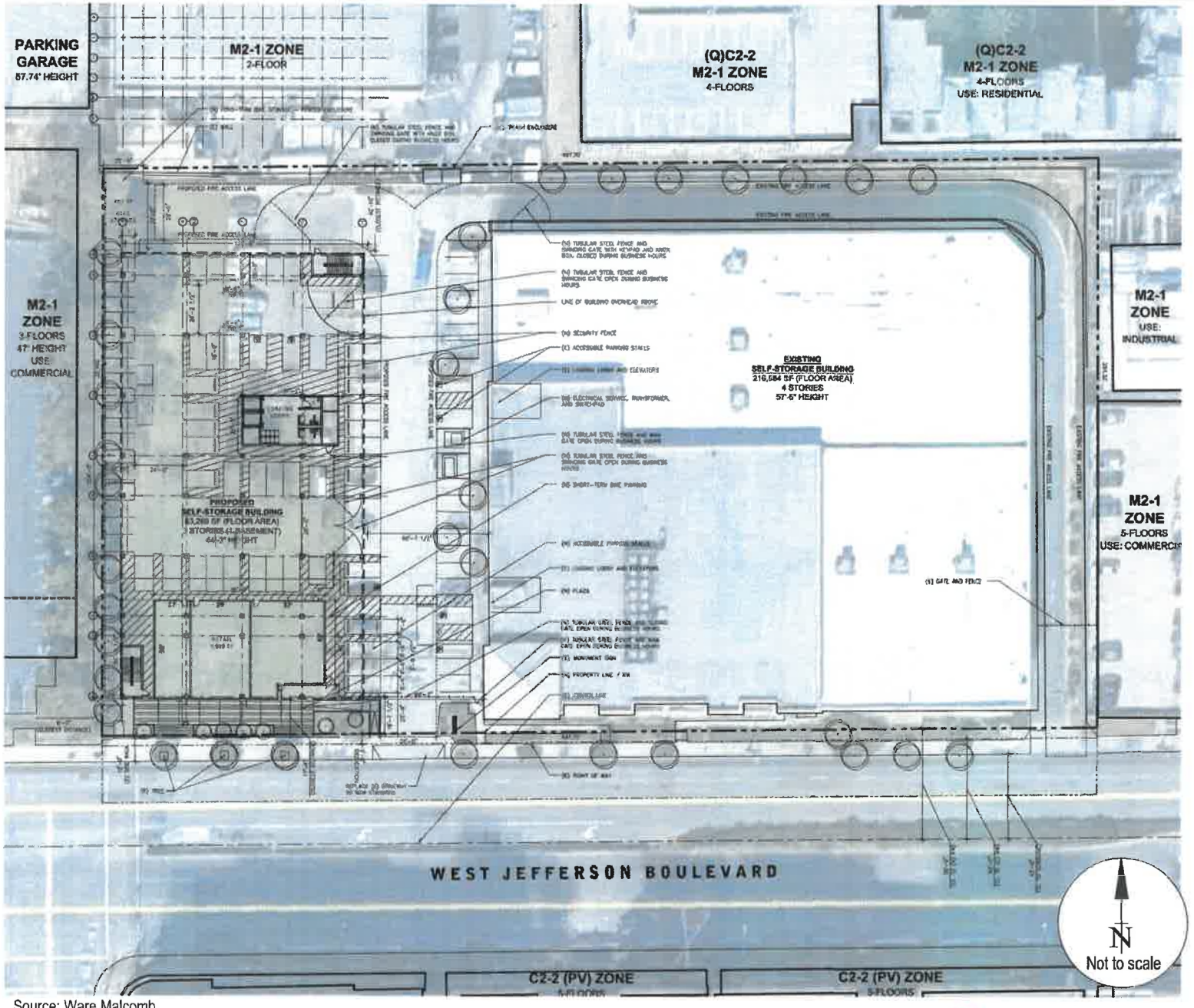
TABLE 2
ESTIMATED PROJECT TRIP GENERATION - FOR SCREENING PURPOSES

	Size	Daily [2]
Proposed Project (Existing + Proposed) Mini-Warehouse	301,313 s.f.	437
Existing Uses (to be remain) Mini-Warehouse	(216,584) s.f.	(314)
Project Net Total	**84,729 s.f.**	**123**
Trip Rates [1] Mini-Warehouse (ITE Land Use 151)	Trips per 1,000 s.f.	1.45

[1] Trip Generation Manual, 11th Edition, ITE 2021.

[2] Per LADOT's Transportation Assessment Guidelines, "*For mixed-use projects, daily trips associated with local serving retail use of the project can be removed in determining if the project's daily vehicle trips are calculated for screening purposes*". Accordingly, trips associated with local-serving retail use are not included in this calculation.

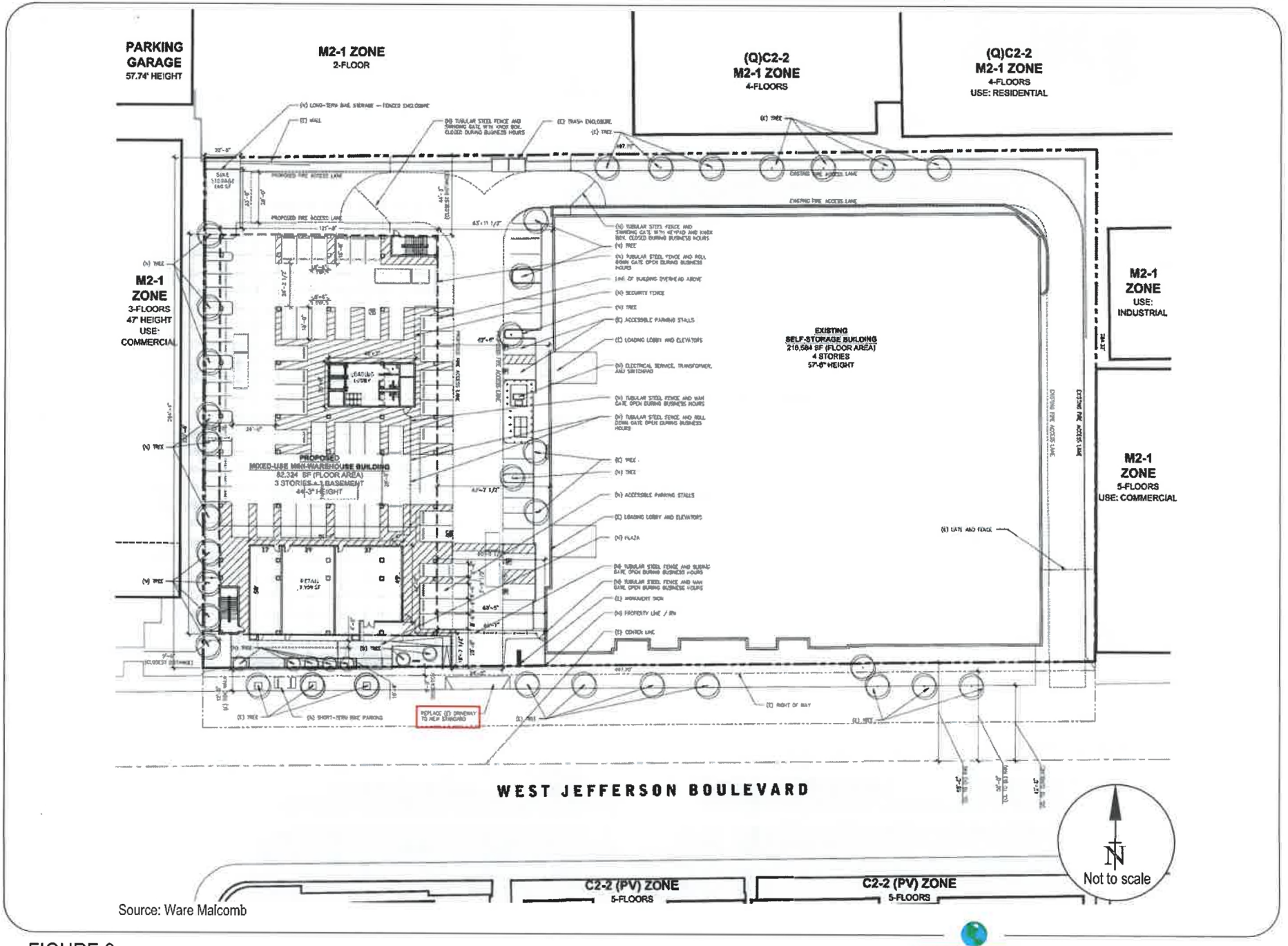
*The Project is estimated to generate a net total of 105 daily trips based on LADOT's VMT Calculator Tool (v1.3).



Source: Ware Malcomb

FIGURE 3
PROJECT SITE PLAN - GROUND FLOOR LEVEL

RAJU Associates, Inc.



Source: Ware Malcomb

FIGURE 3
PROJECT SITE PLAN - GROUND FLOOR LEVEL

RAJU Associates, Inc.

12681 W Jefferson Blvd: New Mini-Storage Bldg expansion, 2nd Update (CTC18-107520)

CITY OF LOS ANGELES VMT CALCULATOR Version 1.4

Project Screening Criteria: Is this project required to conduct a vehicle miles traveled analysis?

Project Information

Project: Public Storage Expansion Project (12681 W.Jefferson)

Scenario:

Address: 12681 W JEFFERSON BLVD, 90066



Is the project replacing an existing number of residential units with a smaller number of residential units AND is located within one-half mile of a fixed-rail or fixed-guideway transit station?

● Yes ○ No

Existing Land Use

Land Use Type	Value	Unit
Industrial | Warehousing/Self-Storage	216.584	ksf
(custom) Mini-Warehouse (ITE 11th Ed) | Daily	314	Trips
(custom) Mini-Warehouse (ITE 11th Ed) | HBW	19	Percent
(custom) Mini-Warehouse (ITE 11th Ed) | HBO	41	Percent
(custom) Mini-Warehouse (ITE 11th Ed) | NHB	20	Percent
(custom) Mini-Warehouse (ITE 11th Ed) | HBW	0	Percent
(custom) Mini-Warehouse (ITE 11th Ed) | HBO	0	Percent
(custom) Mini-Warehouse (ITE 11th Ed) | NHB	20	Percent
(custom) Mini-Warehouse (ITE 11th Ed) | Daily	0	Residents
(custom) Mini-Warehouse (ITE 11th Ed) | Daily	71	Employees
(custom) Mini-Warehouse (ITE 11th Ed) | Daily	Non-Retai	Retail/Non-R

☑ Click here to add a single custom land use type (will be included in the above list)

Proposed Project Land Use

Land Use Type	Value	Unit
Industrial | Warehousing/Self-Storage	297.198	ksf
(custom) Mini-Warehouse (ITE 11th Ed) | Daily	431	Trips
(custom) Mini-Warehouse (ITE 11th Ed) | HBW	19	Percent
(custom) Mini-Warehouse (ITE 11th Ed) | HBO	41	Percent
(custom) Mini-Warehouse (ITE 11th Ed) | NHB	20	Percent
(custom) Mini-Warehouse (ITE 11th Ed) | HBW	0	Percent
(custom) Mini-Warehouse (ITE 11th Ed) | HBO	0	Percent
(custom) Mini-Warehouse (ITE 11th Ed) | NHB	20	Percent
(custom) Mini-Warehouse (ITE 11th Ed) | Daily	0	Residents
(custom) Mini-Warehouse (ITE 11th Ed) | Daily	98	Employees
(custom) Mini-Warehouse (ITE 11th Ed) | Daily	Non-Retai	Retail/Non-R

☑ Click here to add a single custom land use type (will be included in the above list)

Project Screening Summary

Existing Land Use	Proposed Project
281 Daily Vehicle Trips	382 Daily Vehicle Trips
2,216 Daily VMT	3,012 Daily VMT

Tier 1 Screening Criteria

Project will have less residential units compared to existing residential units & is within one-half mile of a fixed-rail station. ☐

Tier 2 Screening Criteria

The net increase in daily trips < 250 trips	101 Net Daily Trips
The net increase in daily VMT ≤ 0	796 Net Daily VMT
The proposed project consists of only retail land uses ≤ 50,000 square feet total.	0.000 ksf

The proposed project is not required to perform VMT analysis.

Measuring the Miles

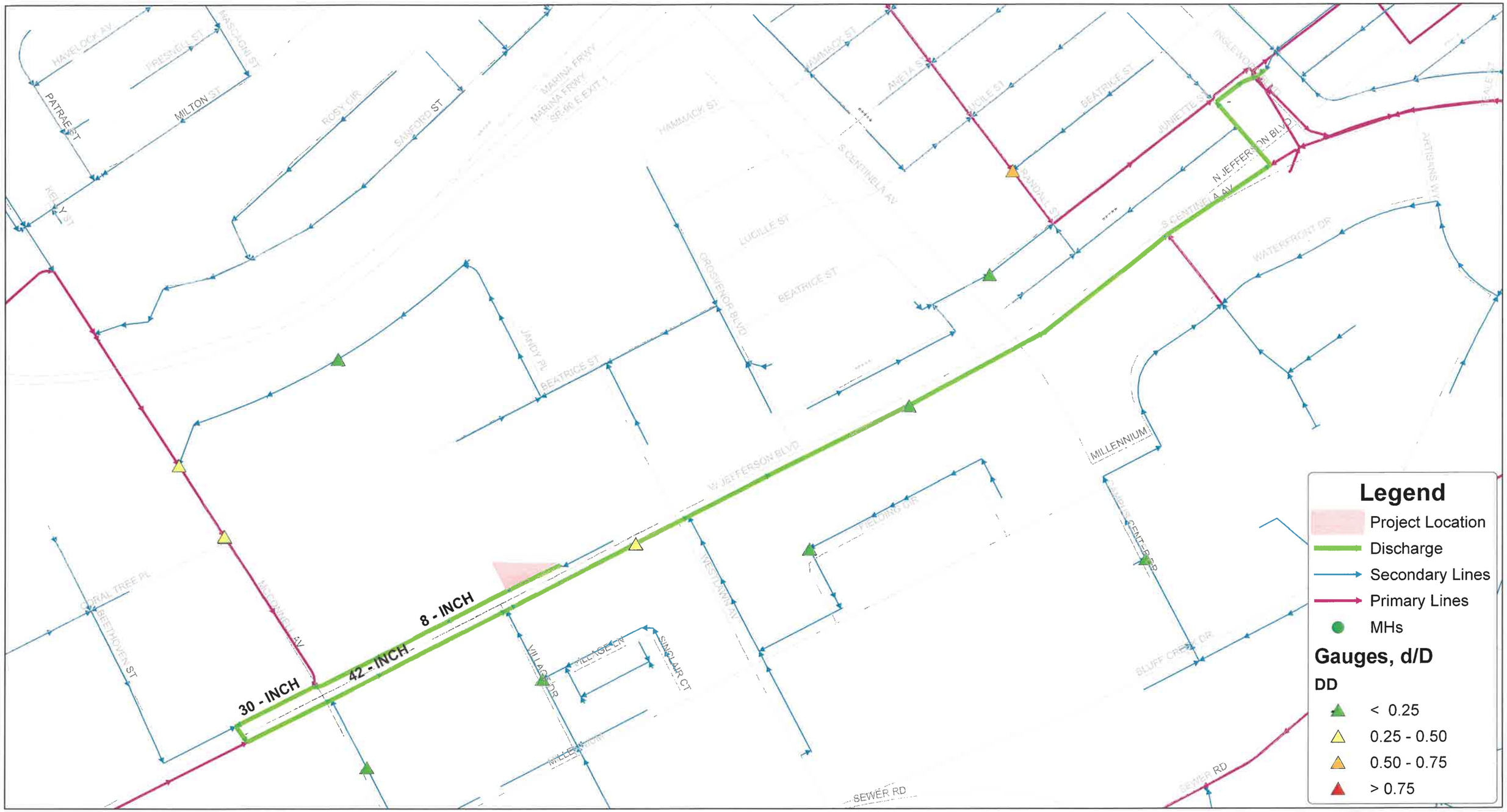
TABLE 2
ESTIMATED PROJECT TRIP GENERATION - FOR SCREENING PURPOSES

	Size	Daily [2]
Proposed Project (Existing + Proposed) Mini-Warehouse	297,198 s.f.	431
Existing Uses (to remain) Mini-Warehouse	(216,584) s.f.	(314)
Project Net Total	**80,614 s.f.**	**117**
Project Net Total (from LADOT VMT Calculator v1.4)		**101**
Trip Rates [1] Mini-Warehouse (ITE Land Use 151)	Trips per 1,000 s.f.	1.45

[1] Trip Generation Manual, 11th Edition, ITE 2021.

[2] Per LADOT's Transportation Assessment Guidelines, "*For mixed-use projects, daily trips associated with local serving retail use of the project can be removed in determining if the project's daily vehicle trips are calculated for screening purposes*". Accordingly, trips associated with local-serving retail use are not included in this calculation.

*The Project is estimated to generate a net total of 101 daily trips based on LADOT's VMT Calculator Tool (v1.4).



Wastewater Engineering Services Division
Bureau of Sanitation
City of Los Angeles

Figure 1
Public Storage Playa Vista Redevelopment Project
Sewer Map

Thomas Brother Data reproduced with permission granted by THOMAS BROS MAP

EXHIBIT D

APPLICANT SUPPLEMENTAL MATERIALS

D.1 – FAR and Height Exhibit

D.2 – Response to Professional Volunteer Program Comments

CPC-2024-115-GPA-ZC-HD-CU-ZAA-SPR

EXHIBIT D

APPLICANT SUPPLEMENTAL MATERIALS

D.1 – FAR and Height Exhibit

CPC-2024-115-GPA-ZC-HD-CU-ZAA-SPR

M2-1 ZONE
5-FLOORS
57.74' HEIGHT
FAR: 2.58

M2-1 ZONE
2-FLOORS
25' HEIGHT
FAR: 0.62

(Q)C2-2
M2-1 ZONE
5-FLOORS
55' HEIGHT
FAR: 1.88

(Q)C2-2
M2-1 ZONE
4-FLOORS
USE: RESIDENTIAL

47' HT.
M2-1 ZONE
3-FLOORS
47' HEIGHT
FAR: 1.53

M2-1
ZONE
1-FLOOR
25' HEIGHT
FAR: 0.43

M2-1 ZONE
4-FLOORS
57.5' HEIGHT
FAR: 1.5

M2-1
ZONE
6-FLOORS
93.3' HEIGHT
FAR: 1.85

PROPOSED MIXED-USE
MINI-WAREHOUSE BUILDING
M2-1 ZONE
82,324 (FLOOR AREA)
3-FLOORS + BASEMENT
57.25' HEIGHT
FAR: 0.57

C2-2 (PV) ZONE
4-FLOORS + MEZZANINE
63.5' HEIGHT
FAR: 0.56

C2-2 (PV) ZONE
5-FLOORS
60' W/ 80' HT. TOWER
FAR: 1.96

C2-2 (PV) ZONE
5-FLOORS
60' W/ 80' HT. TOWER
FAR: 1.96

WEST JEFFERSON BOULEVARD

1" = 20'
0 10 20 40 100
NORTH

Conceptual Plot Plan

WARE MALCOMB

SHEET
A1.0

EXHIBIT D

APPLICANT SUPPLEMENTAL MATERIALS

D.2 – Response to Professional Volunteer Program Comments

CPC-2024-115-GPA-ZC-HD-CU-ZAA-SPR

May 21, 2024 | Professional Volunteer Program

Case 2:

Address: 12681 W Jefferson Boulevard

Case No.: CPC-2024-115-GPA-ZC-HD-CU-ZAA-SPR

Project Description: Self-storage with retail mixed-use project near Playa Vista, an intensification of an existing self-storage development on site.

Project Planner: Kenton Trinh

Pedestrian First

- Planting and steps in front of retail are a nice pedestrian amenity.
- What type of retail is proposed? (boxes and tape for storage use, or another type of retail use?)
- Tenant signage looks boring and nondescriptive. Enhance the retail spaces to be more welcoming to new tenants and more unique from the rest of the building.

360° Design

- Blank wall on the façade could use some artwork or some articulation (mural or some art to give back to the community).
- Variation of the plane/depth of the façade would be helpful to soften the façade.
- The retail façade is somewhat bland, improve the appearance to look more distinguished.

Climate Adapted

- Planting of new trees on the site is positive. More trees and impervious surface should be provided toward the back of the lot where there is room for tree planting.
- Good opportunity to provide LID, bioswale towards the rear of the site, rest area for visitors/employees.
- Prioritize locally native plants, especially those that will do well in a coastal setting.
- Place overhead utilities underground.

<u>Action Items</u>

- ☐ Plans are somewhat difficult to read (keep orientation consistent, show public right of way, etc.).
- ☐ Check with LAFD, will they accept trees and parking spaces in the fire lane?

September 13, 2024

To: Kenton Trinh, City Planner
Los Angeles City Planning
200 N. Spring Street, Room 721
Los Angeles CA 90012

RE: Public Storage Redevelopment Project
12681 West Jefferson Boulevard
Los Angeles, CA 90066
Case No. CPC-2024-115-GPA-ZC-HD-CU-ZAA-SPR

Dear Mr. Trinh,

We respectfully submit the enclosed drawings in support of the proposed project at the above-referenced location.

Urban Design Studio Comments
The following are responses to the design comments staff provided from the Urban Design Studio meeting on May 1, 2024.

1. **Pedestrian First:**
   a. *Similar intensification of a self-storage use as the project further east at 5741 Jefferson (same design team) but with fewer of that project's flaws; this site manages to utilize the (existing) fire lane to also serve as access to customer parking and proposes retail spaces that are more convincing as ones that could be viable, as somewhat less walled-off from street by planters.*

   b. *Navigating these types of facilities can be a disorienting—and sometimes spooky—experience; in place of spandrel glass please consider whether there is any way to provide windows at the end of access aisles, or in at least a few key locations, to admit the daylight that can help cue users to their location within the structure.*
   Response: The internal circulation of the storage areas is typically internal to the building; please see floor plans on Sheets A2.2 and A2.3. It is most efficient for storage units to line the exterior walls of the building, so there are typically no windows into the corridors because they are not adjacent to exterior walls. Public Storage will have signage throughout the interior of the building to help customers with wayfinding, including diagrammatic floor plan indicating location within the building to help customers orient themselves.

2. **360° Design:**
   a. *Leaving the structured parking completely open on the sides could be a positive feature in terms of providing natural ventilation and perhaps an enhanced feeling of security but screening parking structures is a hot-button issue with the CPC; see Above Grade Parking Advisory.*
   Response: The parking layout addresses the concepts proposed in the Above Grade Parking Advisory. The main parking area under the building is screened from the street by the retail spaces on the ground floor. Accessible parking spaces are located adjacent to the retail area and to the rental office in the existing building for ease of use for customers and visitors using the accessible spaces.

   The ground floor parking under the building and screened by the retail use is open on the sides and back for ventilation and security. Trees have been placed adjacent to the building on the west side for

additional screening from the adjacent parcel. The property to the north includes a CMU wall at the property line and an industrial building with no windows looking toward the proposed project. The only windows facing the proposed building in the existing Public Storage building to the east are in the rental office, which faces the retail area.

3. **Climate-Adapted:**
   a. *Consider substituting larger-canopy species of trees for the Lagerstroemia and Cercis proposed for along retail frontage, as both of these will stay small and block the signage; better to have faster-growing species that will get above the signage and provide more shade.*
   Response: Given that existing powerlines along the street frontage, the proposed trees must remain on the smaller side to avoid interfering with the powerlines. With that, we cannot provide larger trees such as palms, canopy trees or taller trees such as Tristania. Therefore, we propose to provide Crepe Myrtle and Western Redbud. While these are smaller trees, they will provide shade canopies and will not interfere with the powerlines. The trees along the frontage will be planted lower and at the elevation of the street. The signage on the building will be at a higher elevation, giving an opportunity to view the signage from down the street.

   b. *Even though part of the spaces are tucked under the building all of them are considered as surface parking; check whether the requisite number of shade trees have been provided.*
   Response: The building coverage (acting as parking structure) is providing the required shading. The trees along the west property edge also provide shading of the parking areas exposed to sky and on the west side of site.

Professional Volunteer Program Comments and Responses

The following are responses to the design comments staff provided from the PVP meeting on May 21, 2024.

1. **Pedestrian First:**
   a. *Planting and steps in front of retail are a nice pedestrian amenity.*

   b. *What type of retail is proposed? (boxes and tape for storage use, or another type of retail use?)*
   Response: We envision the retail space to host a mix of daily community needs retail uses, such as small studio format fitness, services, and/or shops. It is premature to engage retailers to finalize the merchandise mix at this time.

   c. *Tenant signage looks boring and nondescriptive. Enhance the retail spaces to be more welcoming to new tenants and more unique from the rest of the building.*
   Response: We acknowledging request for welcoming and unique signs. Signs depicted in the plans are for reference only. Tenant sign design will be confirmed when spaces are leased. Ultimately, the signage will be dependent on future tenant's brand identity, and these signs will be the result of careful collaboration between Public Storage and the tenants.

2. **360° Design:**
   a. *Blank wall on the façade could use some artwork or some articulation (mural or some art to give back to the community).*
   Response: Our building design reflects a harmonious blend of form and function, crafted with a mix of high quality material that incorporates thoughtfully placed details including vertical breaks, pop-outs, and accent colors. The incorporation of EIFS, metal panel, and glass (clear and spandrel) allow for a balanced interplay between transparency and opacity, enhancing both the visual appeal and the functional performance of the structure.

   During the design process, we carefully considered community stakeholder feedback to ensure that the building not only meets but exceeds the expectation of our customers and the community. We added ground-floor retail as a way to enhance the pedestrian experience. We want the focus to be on those ground-floor retail spaces and not have any strong graphics above that might detract or be in

conflict with the signage and storefront design at the ground level. The current elevation design is a product of community collaboration, including between our team and the Del Rey Neighborhood Council.

b. *Variation of the plane/depth of the façade would be helpful to soften the façade.*
Response: The use of the building naturally leads to a boxy mass with flat walls; however, we wanted to add interest to the façades to break up the mass and give the design a sense of scale. The street facing façade provides several elements and layers to provide depth to the elevation – including the retail massing bump out and canopies and adjacent partially recessed retail storefront at the first floor level, a large 3D display area with visual glazing and locker units set back at the main building corner and the bump-out frames framing the visual glazing.

c. *The retail façade is somewhat bland, improve the appearance to look more distinguished.*
Response: The façade is provided with a mix of high performance (Solarban or equal), highly transparent glazing which will allow for great, clear views into the retail spaces. This design gives future tenants maximum flexibility when designing their store front. Once the retail tenants are established and their signage installed, the look and layout of the retail spaces will add visual interest to passers-by as they drive past the site. The retail façade ends up being a reflection of retailer's brand identity, individual retailers will have the opportunity to customize their façades as part of the tenant improvement work.

3. **Climate Adapted:**
a. *Planting of new trees on the site is positive. More trees and impervious surface should be provided toward the back of the lot where there is room for tree planting.*
Response: The site plan design maximizes landscaping around the site, providing landscaping where possible that would not interfere with access and circulation throughout the site or with the proposed retail and storage uses.

b. *Good opportunity to provide LID, bioswale towards the rear of the site, rest area for visitors/employees.*
Response: The rear area of the site provides Fire Department access for the building. The site currently is designed to capture stormwater runoff and re-use the stormwater for site irrigation of the site landscaping rather than using bio-swales.

c. *Prioritize locally native plants, especially those that will do well in a coastal setting.*
Response: The plant palette proposed for our site is all drought tolerant, MWELO approved material that meets local jurisdictional requirements. The planting material has been carefully selected for this project with the local environment, planting material, project aesthetic and the buildings specific program. Materials along the retail frontage were selected to ensure a visual connection to the retail spaces are maintained. All proposed MWELO plant material is indigenous to the state of California and anticipated to thrive at this location.

d. *Place overhead utilities underground.*
Response: There are overhead utility lines throughout Jefferson Blvd. They are shown by DWP as 34.5kV lines, are considered high voltage and should not be undergrounded. We have provided adequate clearance from the building and have planned landscaping to avoid interfering with these utility lines.

4. **Action Items:**
a. *Plans are somewhat difficult to read (keep orientation consistent, show public right of way, etc.)*
Response: The conceptual architectural plans include consistent orientation and show the public right of way on the plot plan as well as the landscape plans. Public right of way is typically not shown on upper level (above-grade) floor plans, consistent with Planning's Floor Plan Instructions.

b. *Check with LAFD, will they accept trees and parking spaces in the fire lane?*
Response: A preliminary meeting with LAFD occurred to review fire access and circulation around the site, and no concerns associated with the parking spaces adjacent to the fire lane were expressed. We continue to work with LAFD as the project progresses.

Best Regards,

Cherry Miao

Development Manager
Public Storage
701 Western Avenue, Glendale, CA 91201
O: (707) 595-8472 x3409
E: cmiao@publicstorage.com

EXHIBIT E

ENVIRONMENTAL DOCUMENTS

E.1 – ENV-2024-116-MND

E.2 – ENV-2024-116-MND Mitigation Monitoring Program

E.3 – ENV-2024-116-MND Agency Comments

CPC-2024-115-GPA-ZC-HD-CU-ZAA-SPR

EXHIBIT E

ENVIRONMENTAL DOCUMENTS

E.1 – ENV-2024-116-MND

CPC-2024-115-GPA-ZC-HD-CU-ZAA-SPR

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

INITIAL STUDY
MITIGATED NEGATIVE DECLARATION

Playa Vista Public Storage Redevelopment Project

Case Number: ENV-2024-116-MND

Project Location: 12681 W. Jefferson Boulevard, Los Angeles, CA, 90066

Community Plan Area: Palm – Mar Vista – Del Rey

Council District: 11— Park

Project Description: The Project Site is an approximately 141,627 square-foot lot (post dedication) that is partially developed with an existing four-story mini-warehouse building consisting of approximately 216,584 square feet of mini-warehouse uses and a surface parking lot. The Project is proposing to construct a new mixed-use building with approximately 82,324 square feet of floor area including 3,959 square feet of retail uses and 78,365 square feet of mini-warehouse uses. The proposed height of the new building is approximately 44 feet and three inches. The Project would be located on the currently undeveloped, approximately 25,000 square foot (0.57-acre) western portion of the Project Site that has been vacant since 2000. The existing approximately 216,584 square foot mini-warehouse building would remain. Upon completion of the Project, the Project Site would be developed with approximately 298,908 square feet of floor area, including approximately 3,959 square feet of retail floor area and approximately 294,949 square feet of mini-warehouse floor area.

PREPARED FOR:

The City of Los Angeles
Department of City Planning

PREPARED BY:

CAJA Environmental Services, LLC
9410 Topanga Canyon Blvd., Suite 101
Chatsworth, CA 91311

APPLICANT:

Public Storage
701 Western Avenue
Glendale, CA 91201

May 2025

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1 INTRODUCTION

An application for the proposed Playa Vista Public Storage Redevelopment Project (Project) has been submitted to the City of Los Angeles (City) Department of City Planning for discretionary review. The Department of City Planning, as Lead Agency, has determined that the Project is subject to the California Environmental Quality Act (CEQA) and that the preparation of an Initial Study and Mitigated Negative Declaration (IS/MND) is required. Thus, this document has been prepared in compliance with the relevant provisions of CEQA and the State CEQA Guidelines as implemented by the City. Based on the analysis provided in this IS/MND, the City has concluded that with implementation of the identified mitigation measures, the Project would not result in any significant environmental impacts. The IS/MND is an informational document and is required to be adopted by the decision maker prior to Project approval by the City.

1.1 PURPOSE OF AN INITIAL STUDY

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

An Initial Study is a preliminary analysis conducted by the Lead Agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the Initial Study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, the Lead Agency shall prepare a Negative Declaration. If the Initial Study identifies potentially significant effects but revisions have been made by or agreed to by the applicant that would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, a Mitigated Negative Declaration is appropriate. If the Initial Study concludes that neither a Negative Declaration or Mitigated Negative Declaration is appropriate, an Environmental Impact Report (EIR) is normally required.[2]

1 The study of alternatives to a project is only required as part of an Environmental Impact Report.

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

1.2 ORGANIZATION OF THE IS/MND

This IS/MND is organized into four sections as follows:

1 INTRODUCTION

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

2 EXECUTIVE SUMMARY

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

3 PROJECT DESCRIPTION

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

4 EVALUATION OF ENVIRONMENTAL IMPACTS

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

1.3 CEQA PROCESS

In compliance with the State CEQA Guidelines, the City, as the Lead Agency for the Project, will provide opportunities for the public to participate in the environmental review process. Throughout the CEQA process, an effort will be made to inform, contact, and solicit input on the Project from various government agencies and the general public, including stakeholders and other interested parties.

At the onset of the environmental review process, the City has prepared this Initial Study to determine whether the Project may have a significant effect on the environment. The analysis contained herein determined that with mitigation, the Project would not have a significant effect on the environment. Therefore, an IS/MND was determined to be the appropriate CEQA document.

2 EXECUTIVE SUMMARY

PROJECT TITLE	PLAYA VISTA PUBLIC STORAGE REDEVELOPMENT PROJECT
ENVIRONMENTAL CASE NO.	ENV-2024-116-MND
RELATED CASES	CPC-2024-115-GPA-ZC-HD-CU-ZAA-SPR

PROJECT LOCATION	12681 W. JEFFERSON BOULEVARD, LOS ANGELES, CA 90066
COMMUNITY PLAN AREA	PALMS – MAR VISTA – DEL REY
GENERAL PLAN DESIGNATION	LIGHT INDUSTRIAL
ZONING	M2-1
COUNCIL DISTRICT	11 – TRACI PARK

LEAD CITY AGENCY	City of Los Angeles Department of City Planning
STAFF CONTACT	KENTON TRINH
ADDRESS	200 N. SPRING STREET, ROOM 763
PHONE NUMBER	213-482-7092
EMAIL	KENTON.TRINH@LACITY.ORG

APPLICANT	PUBLIC STORAGE
ADDRESS	701 WESTERN AVENUE, GLENDALE, CA 91201
PHONE NUMBER	818-244-8080

PROJECT DESCRIPTION

The Project would involve the construction of a new mixed-use building with approximately 82,324 square feet of floor area including approximately 3,959 square feet of ground-floor retail uses and 78,365 square feet of mini-warehouse uses. The proposed height of the new building is approximately 44 feet and three inches. The Project would be located on the currently undeveloped, approximately 25,000 square foot (0.57-acre) western portion of the Project Site that has been vacant since 2000. The existing approximately 216,584 square foot mini-warehouse building would remain. Upon completion of the Project, the Project Site would be developed with approximately 298,908 square feet of floor area, including approximately 3,959 square feet of retail floor area and approximately 294,949 square feet of mini-warehouse floor area.[1]

(For additional detail, see "Section 3. PROJECT DESCRIPTION").

ENVIRONMENTAL SETTING

The Project Site is located at 12681 W. Jefferson Boulevard, in the Playa Del Rey community (Assessor Parcel Numbers (APNs) are 4211-009-025, 4211-009-028, and 4211-005-017). The existing land use designation for the Project Site in the Palms – Mar Vista – Del Rey Community Plan is Light Industrial, and the existing zoning for the Site is M2-1. The Project Site is an approximately 141,627 square-foot lot (post dedication) that is partially developed with an existing four-story mini-warehouse building consisting of approximately 216,584 square feet of mini-warehouse uses and a surface parking lot. The western approximately 25,000 square feet of the Project Site is currently vacant and undeveloped.

(For additional detail, see "Section 3. PROJECT DESCRIPTION").

OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED

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

None

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

[1] The proposed gross floor area is approximately 4,138 square feet of retail uses and 80,614 square feet of mini-warehouse uses.

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

DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

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

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

PRINTED NAME	**TITLE**
SIGNATURE	**DATE**

EVALUATION OF ENVIRONMENTAL IMPACTS

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

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

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

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as described in (5) below, may be cross referenced).

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

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

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

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

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

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

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

9) The explanation of each issue should identify:

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

    b) The mitigation measure identified, if any, to reduce the impact to less than significance.

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The Project Applicant, Public Storage, proposes the construction of a new three-story plus basement mixed-use building with approximately 82,324 square feet of floor area including 3,959 square feet of retail uses and 78,365 square feet of mini-warehouse uses with a proposed maximum building height of 44 feet, three inches, on the Project Site (Assessor Parcel Numbers (APNs) 4211-009-025, 4211-009-028, and 4211-005-017). The Project Site is currently partially developed with an existing approximately 216,584 square foot mini-warehouse building that contains four stories, which would remain as part of the Project. Upon completion of the Project, the Project Site would be developed with approximately 298,908 square feet of floor area, including approximately 3,959 square feet of retail floor area and approximately 294,949 square feet of mini-warehouse floor area, with a floor area ratio (FAR) of 2.1:1.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

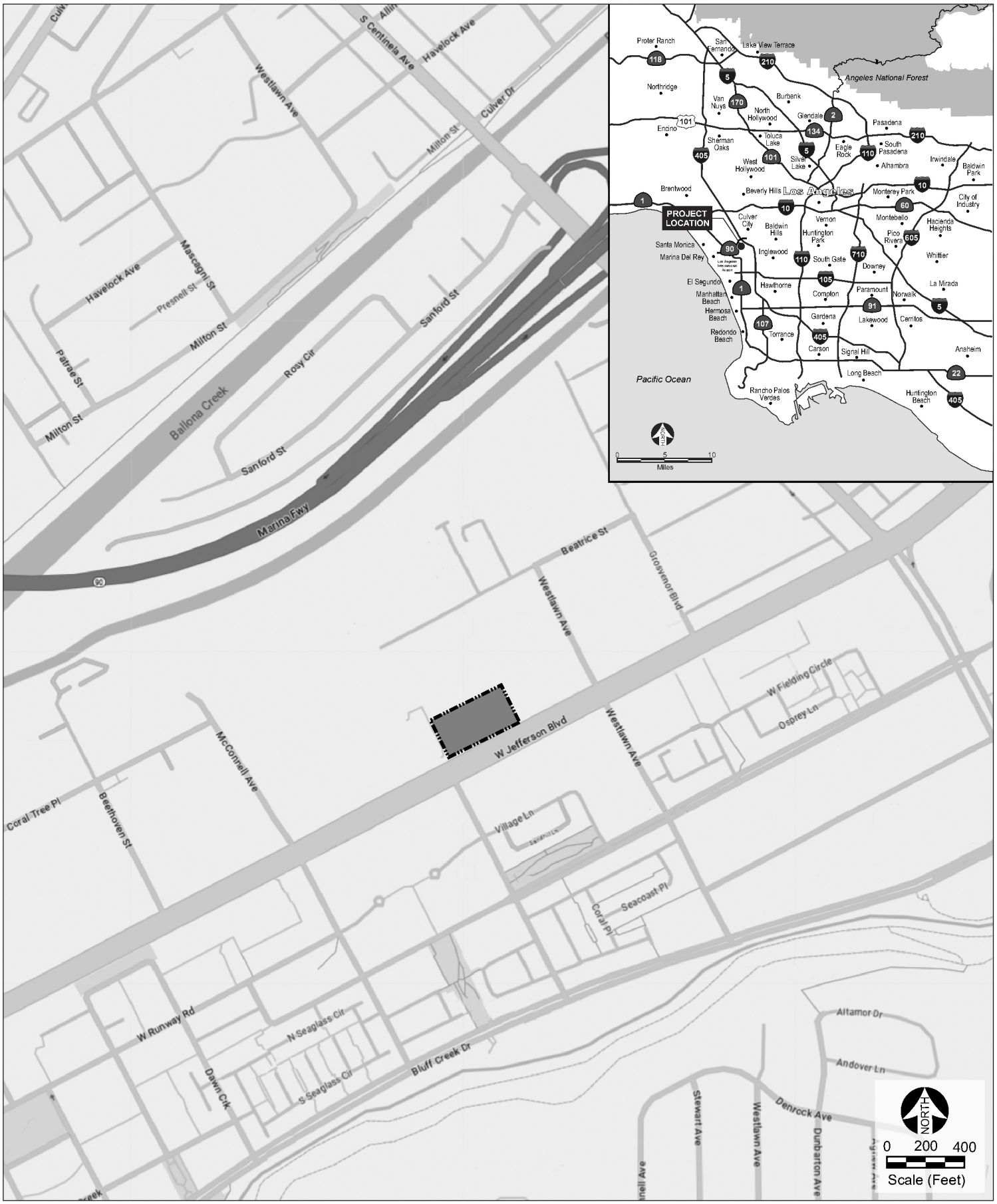
The Project Site is located at 12681 West Jefferson Boulevard, in the Playa Del Rey community of the City of Los Angeles, and is accessible via Jefferson Boulevard. The Project Site is within the M2-1 zone and is designated Light Industrial in the Palms – Mar Vista – Del Rey Community Plan Area (Community Plan). Regional vehicular access to the Project Site is provided by the I-405 San Diego Freeway and the SR-90 Marina Freeway. Major arterials serving the Project Site include Jefferson Boulevard and Centinela Avenue. Local-serving streets surrounding the Project Site include Campus Center Drive, McConnell Avenue, Village Drive, and Westlawn Avenue.

3.2.2 Existing Conditions

The Project Site is an approximately 141,627 square-foot lot (post dedication) that is partially developed with an existing four-story mini-warehouse building consisting of approximately 216,584 square feet of mini-warehouse uses and a surface parking lot. The western 25,000 square feet of the Project Site is currently vacant and undeveloped.

3.2.3 Surrounding Land Uses

The Project Site is bounded by Jefferson Boulevard to the south; commercial and industrial uses in the M2-1 zone to the east; commercial uses in the M2-1 zone to the west; and commercial, industrial, and residential uses in the M2-1 and [Q]C2-2 zones to the north. A map showing the surrounding land uses is provided in Figure 3-3.



Legend

Project Site

Source: Google Maps 2024.

Figure 3-1
Regional Location Map

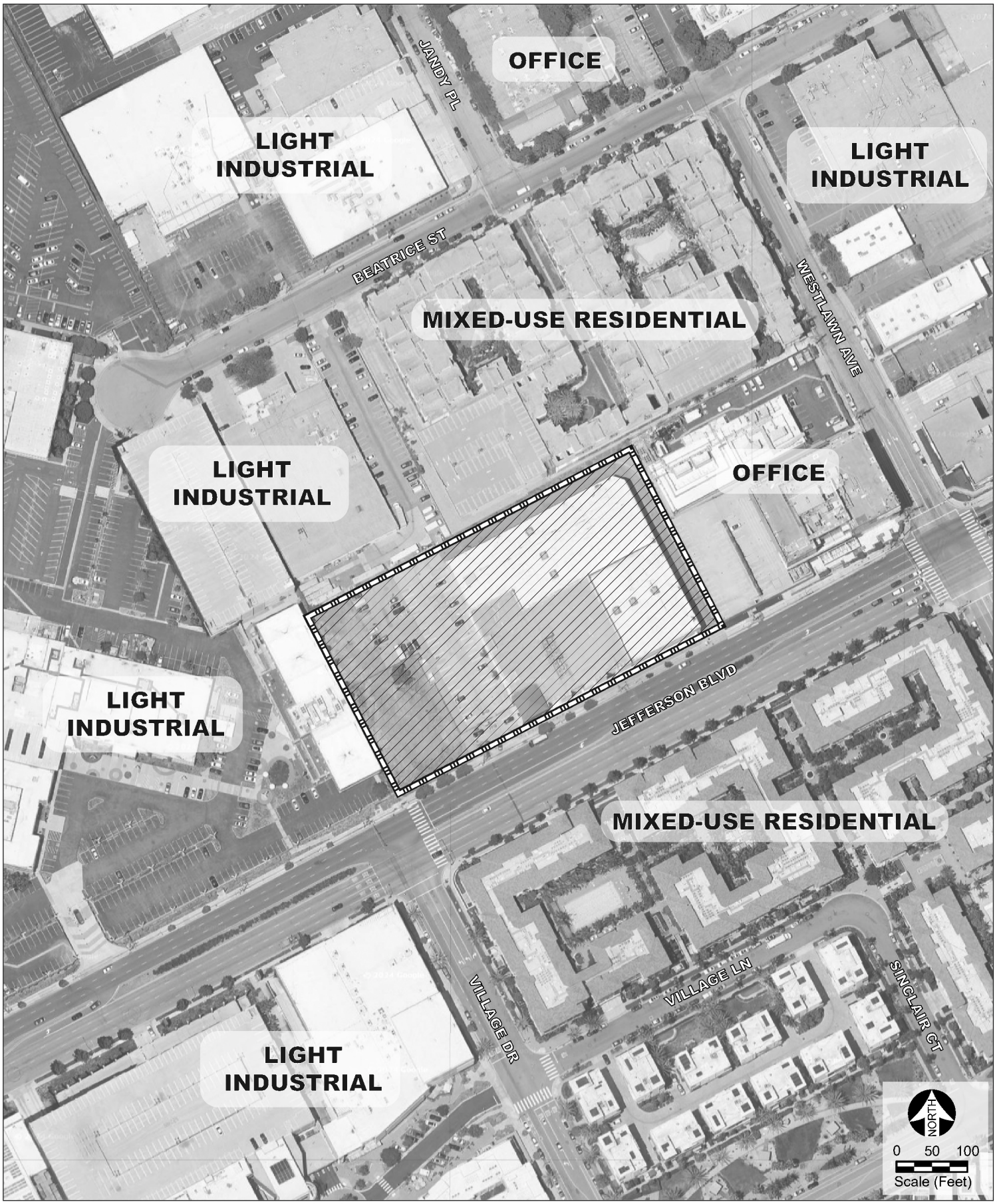


Legend

Project Site

Source: Google Maps 2024.

Figure 3-2
Aerial Map



Legend

Project Site

Source: Google Maps 2024.

Figure 3-3
Surrounding Land Uses

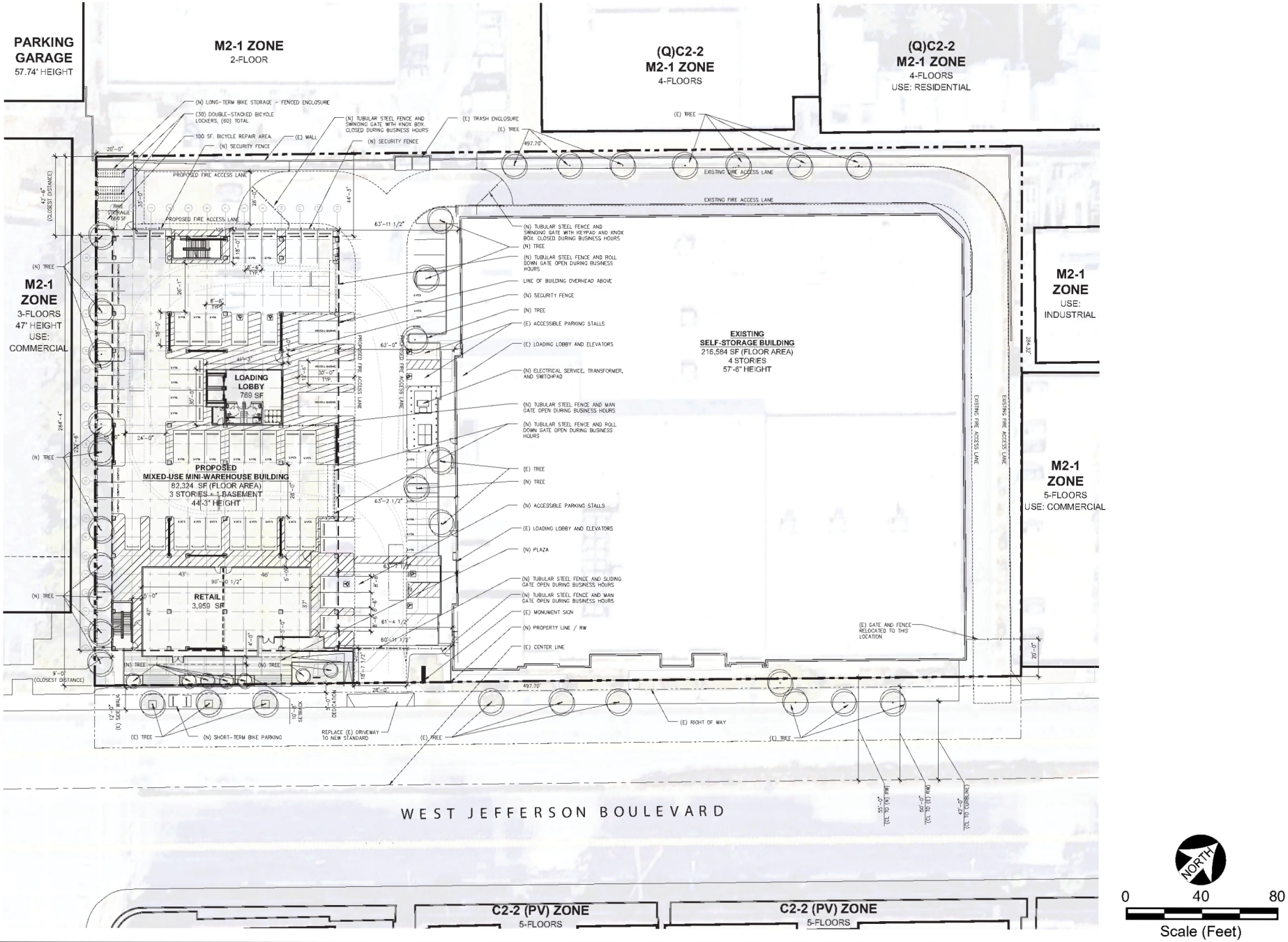
3.2.4 Existing Transit Service

Four bus lines currently serve the vicinity of the Project Site. One bus line (Line 110) is operated by the Los Angeles County Metropolitan Transportation Authority (Metro), one bus line (Commuter Express (CE) 437B) is operated by the Los Angeles Department of Transportation (LADOT), one bus line (Line 4) is operated by the Culver City Bus (CC), and one bus line (Daily Shuttle) is operated by Playa Vista (PV). Bus stops are located at the corners of the intersection of McConnell Avenue/Jefferson Boulevard that serve Metro 110, LADOT CE437B, and CC Line 4. Bus stops are also located at the corners of the intersection of Village Drive/Millennium Drive that serve PV Daily Shuttle.

3.3 DESCRIPTION OF THE PROJECT

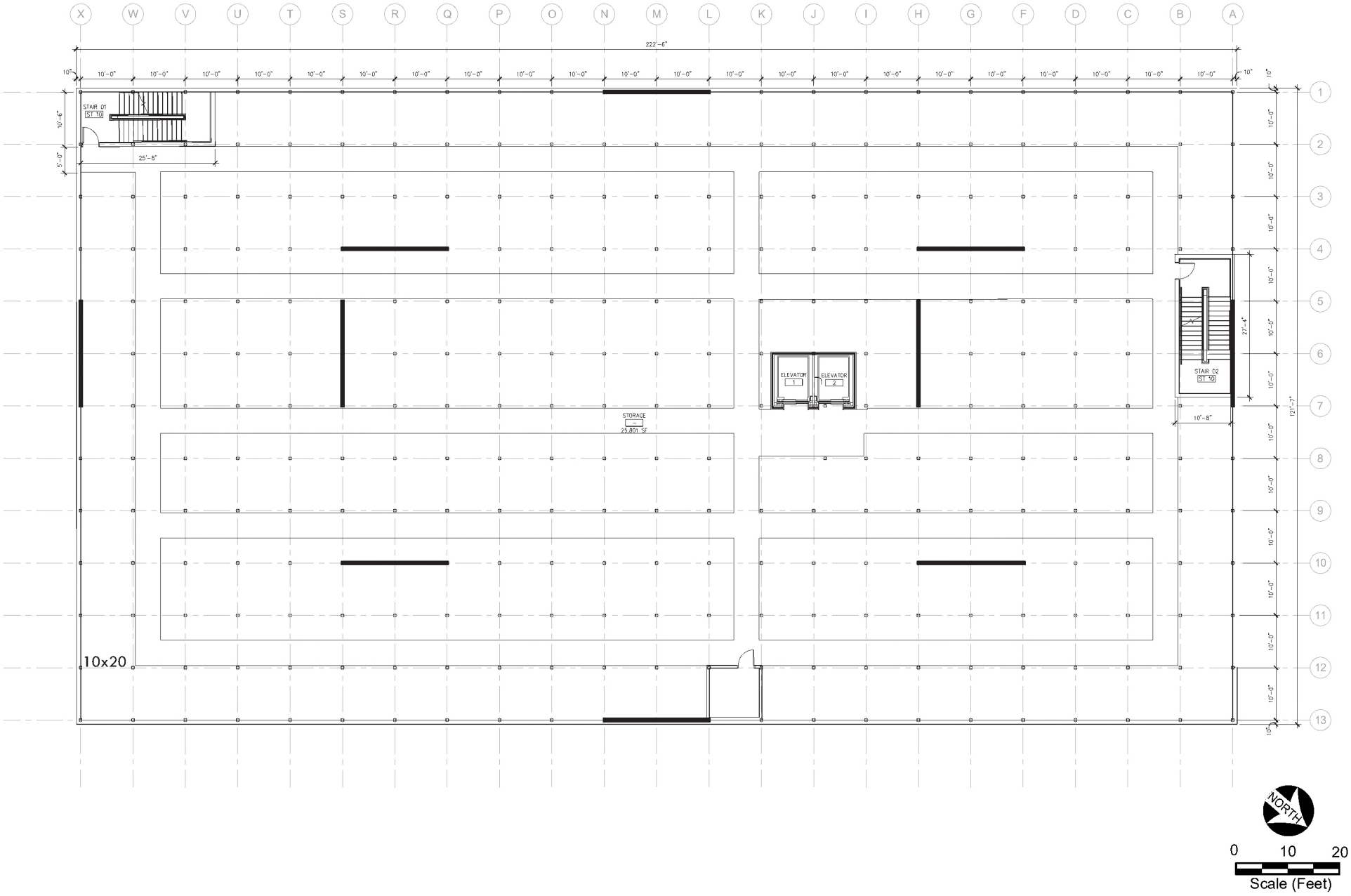
3.3.1 Project Overview

The Project Site is an approximately 141,627 square-foot lot (post dedication) that is partially developed with an existing four-story mini-warehouse building consisting of approximately 216,584 square feet of mini-warehouse uses and a surface parking lot. The Project is proposing to construct a new mixed-use building with 82,324 square feet of floor area including 3,959 square feet of retail uses and 78,365 square feet of mini-warehouse uses. The proposed height of the new building is approximately 44 feet and three inches in height. The Project would be located on the currently undeveloped, approximately 25,000 square foot (0.57-acre) western portion of the Project Site that has been vacant since 2000. The existing approximately 216,584 square foot mini-warehouse building would remain. Upon completion of the Project, the Project Site would be developed with approximately 298,908 square feet of floor area, including approximately 3,959 square feet of retail floor area and approximately 294,949 square feet of mini-warehouse floor area. The site plan is provided in Figure 3-4, floor plans are provided in Figures 3-5 through 3-10, elevations are provided in Figures 3-11 and 3-12, the landscape plan is provided in Figure 3-13, and renderings are provided in Figures 3-14 and 3-15.



Source: Ware Malcomb Architecture, 2025.

Figure 3-4
Site Plan



Source: Ware Malcomb Architecture, 2024.

Figure 3-5
Basement Floor Plan

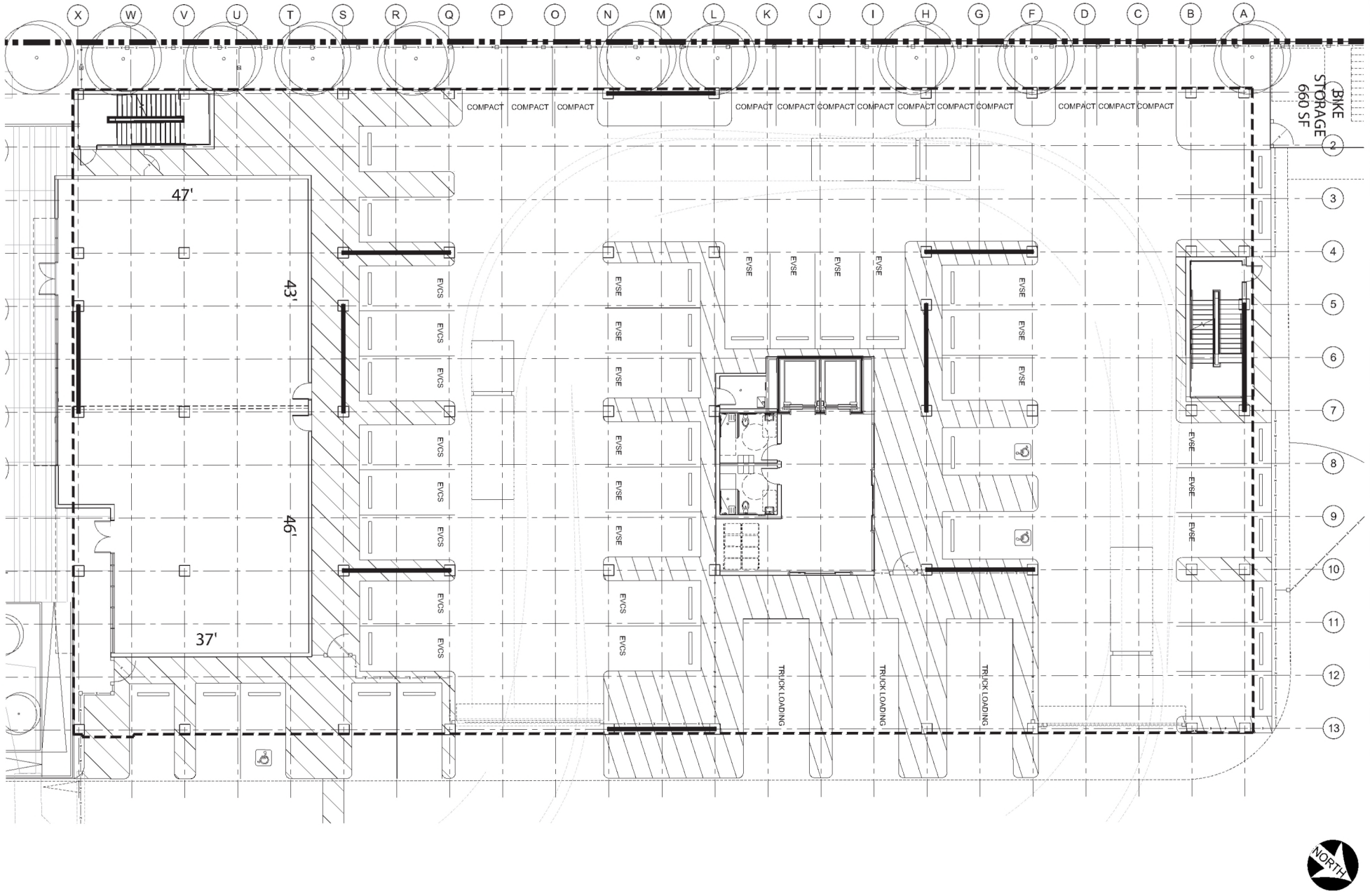


Figure 3-6
Ground Floor Plan

Source: Ware Malcomb Architecture, 2025.

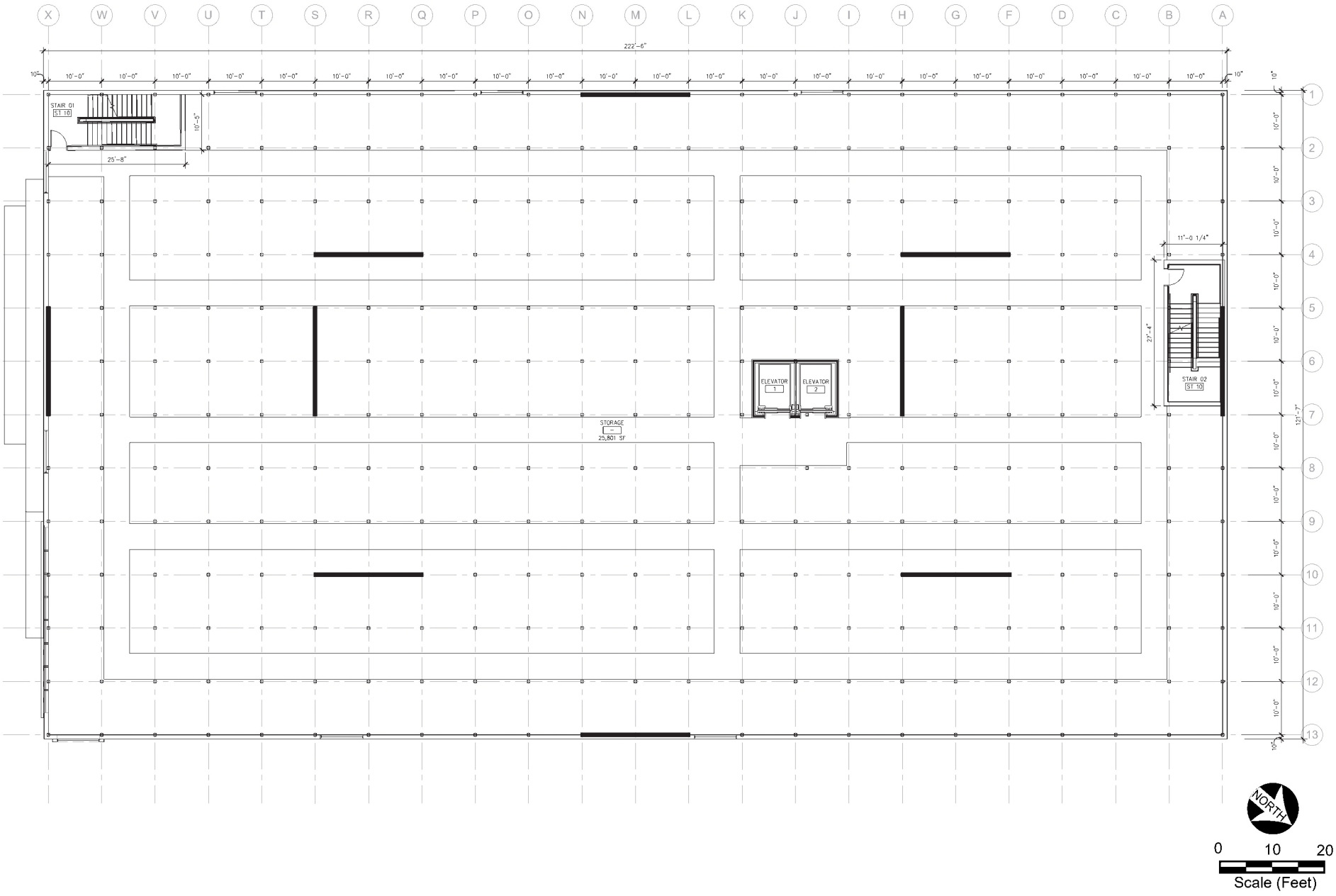


Figure 3-7
Level 2 Floor Plan

Source: Ware Malcomb Architecture, 2024.

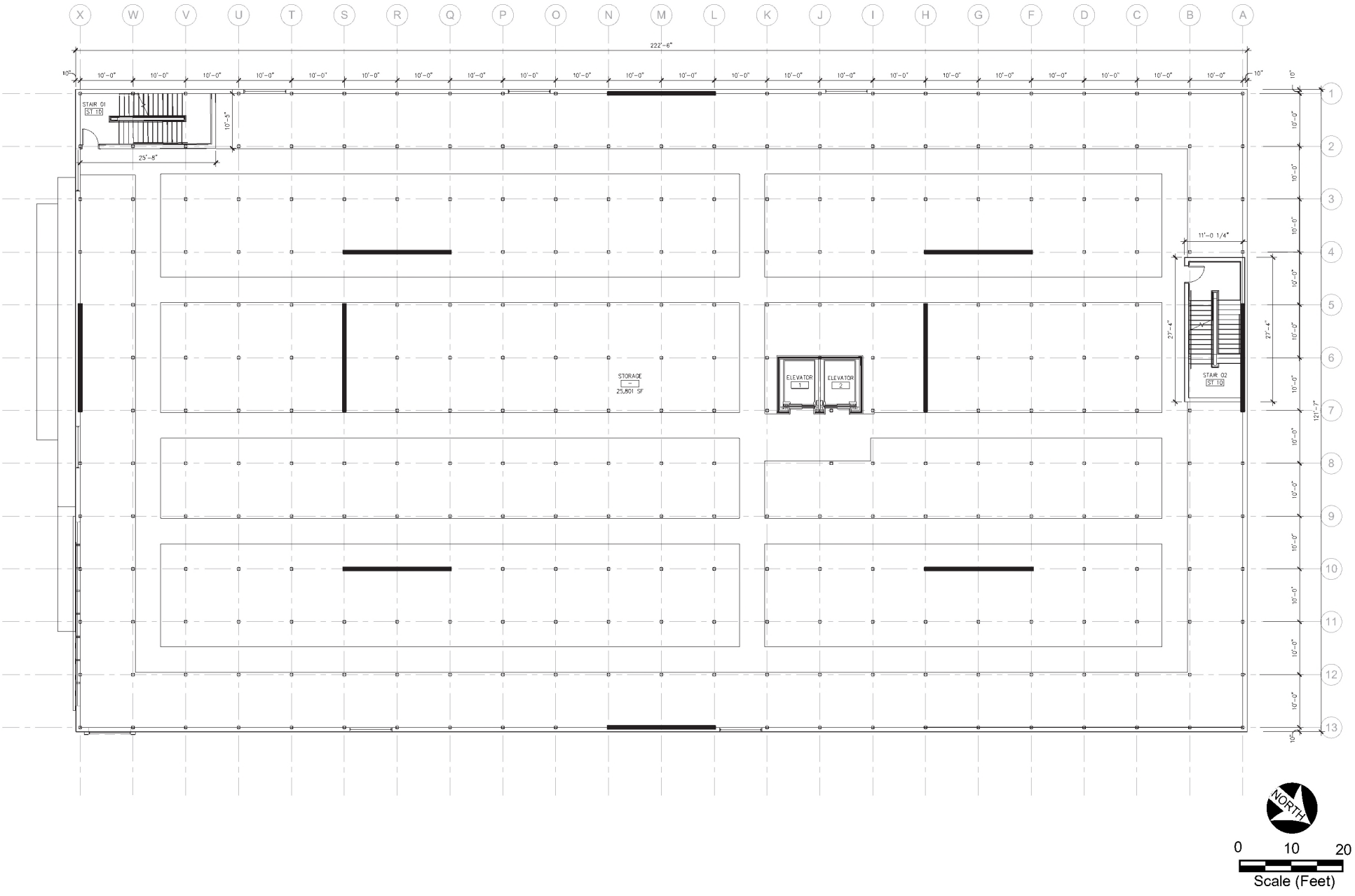
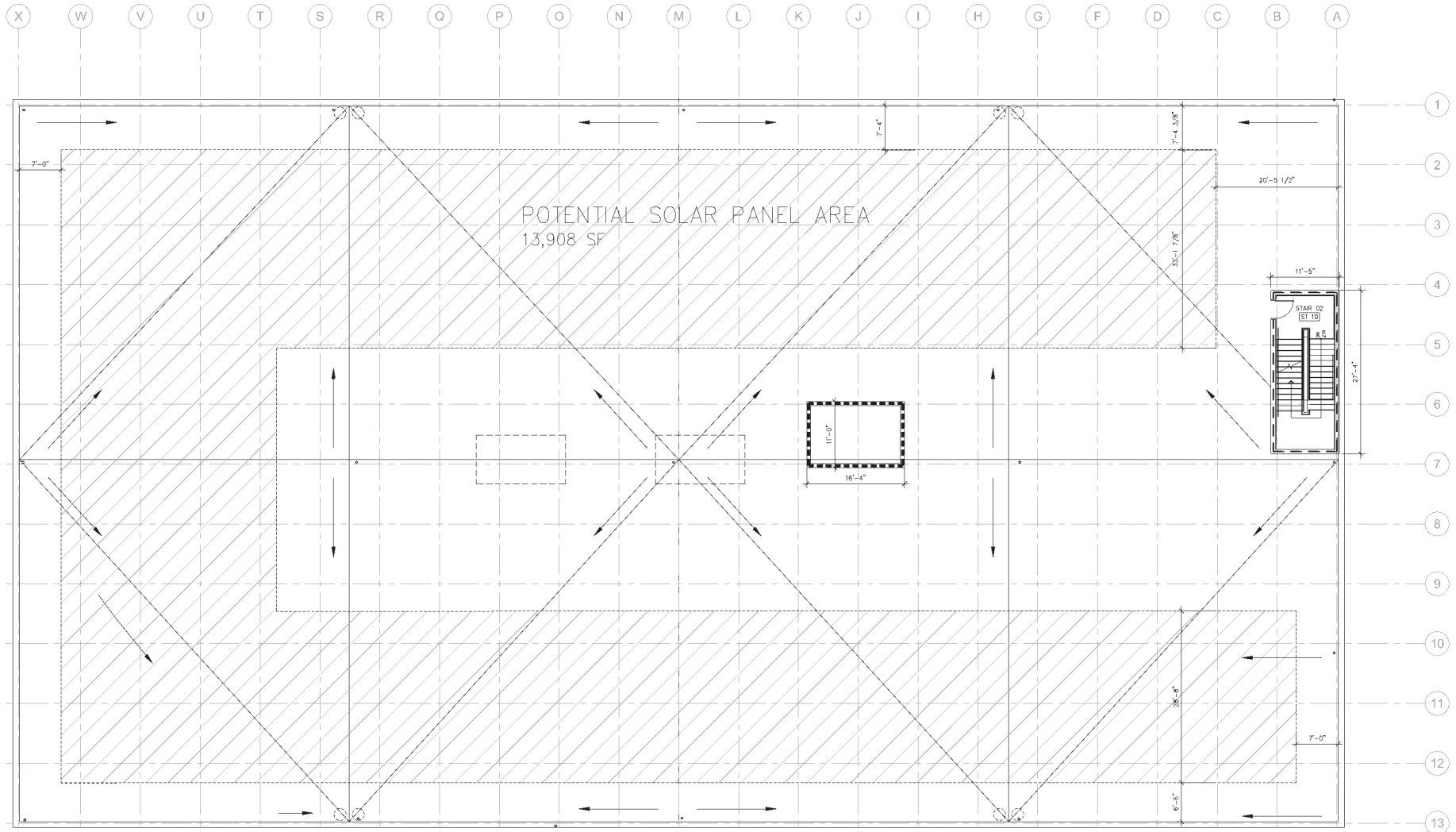


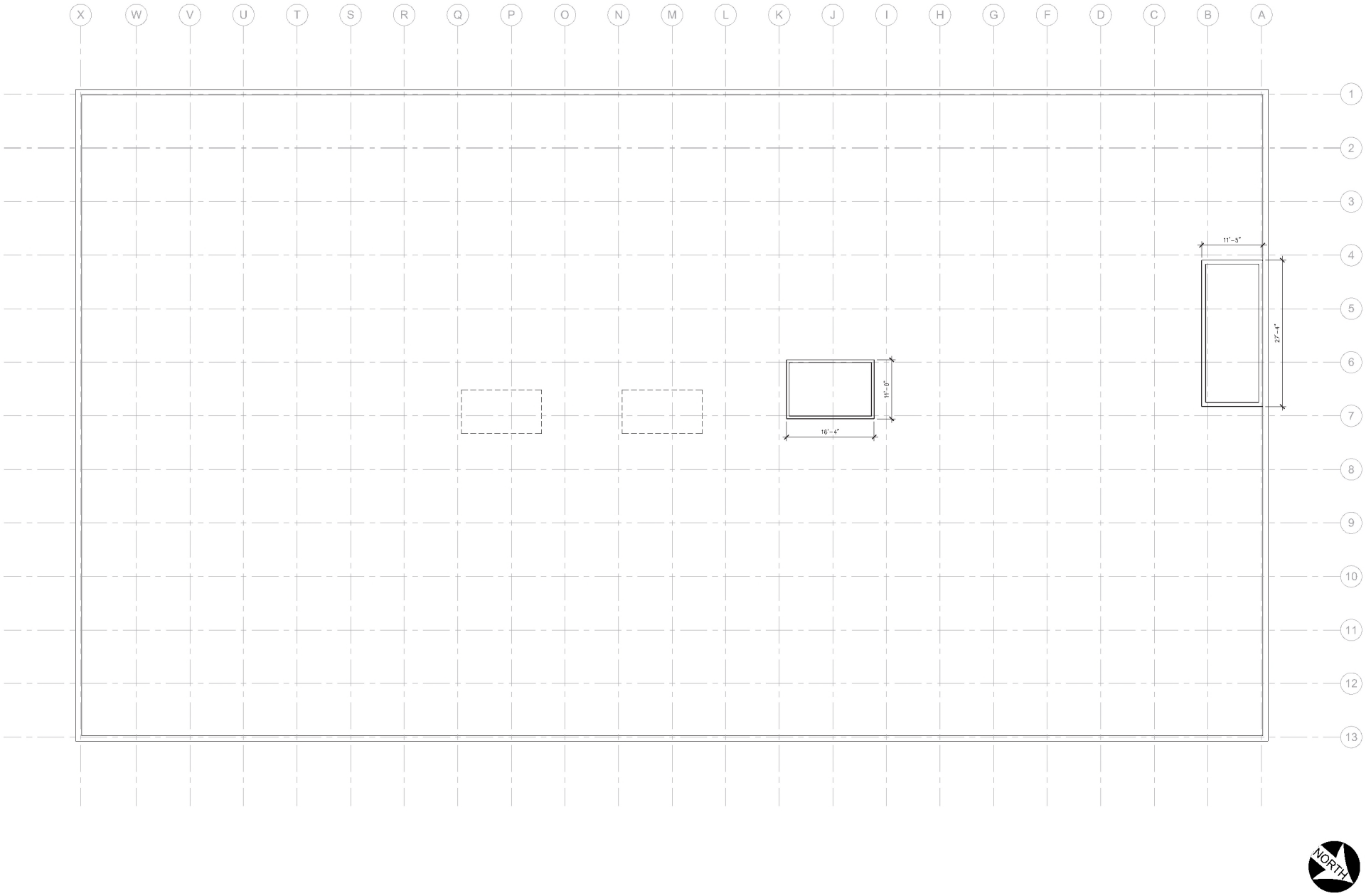
Figure 3-8
Level 3 Floor Plan

Source: Ware Malcomb Architecture, 2024.



Source: Ware Malcomb Architecture, 2024.

Figure 3-9
Roof Lower Level Plan



Source: Ware Malcomb Architecture, 2024.

Figure 3-10
Roof Upper Level Plan



SOUTH ELEVATION



WEST ELEVATION

KEYNOTES

1 MORIN METAL PANEL SYSTEM
PAINTED: PUBLIC STORAGE ORANGE

2 CLEAR ANODIZED STOREFRONT SYSTEM

3 EXTERIOR INSULATION AND FINISH SYSTYM (EIFS)
PAINTED: WINTER MOOD, PPG14-16

4 METAL COMPOSITE PANEL
ALUCOBOND, PURE WHITE - RWW

5 SITECAST CONCRETE

6 CONCRETE MASONRY WALL
ANGELUS BLOCK, PLACER CREEK

7 EXTERIOR INSULATION AND FINISH SYSTYM (EIFS)
PAINTED: PUBLIC STORAGE ORANGE

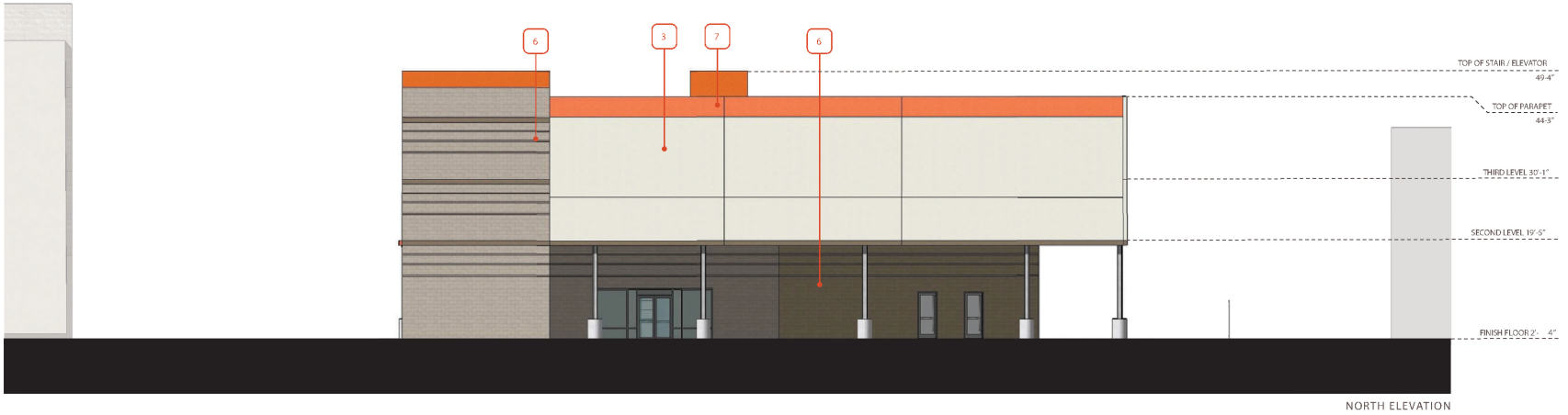
8 EXTERIOR INSULATION AND FINISH SYSTYM (EIFS)
PAINTED: ROLLER COASTER, PPG1008-5

9 TENANT SIGNAGE

10 SPANDREL GLASS

Source: Ware Malcomb Architecture, 2024.

Figure 3-11
South and West Elevations



NORTH ELEVATION



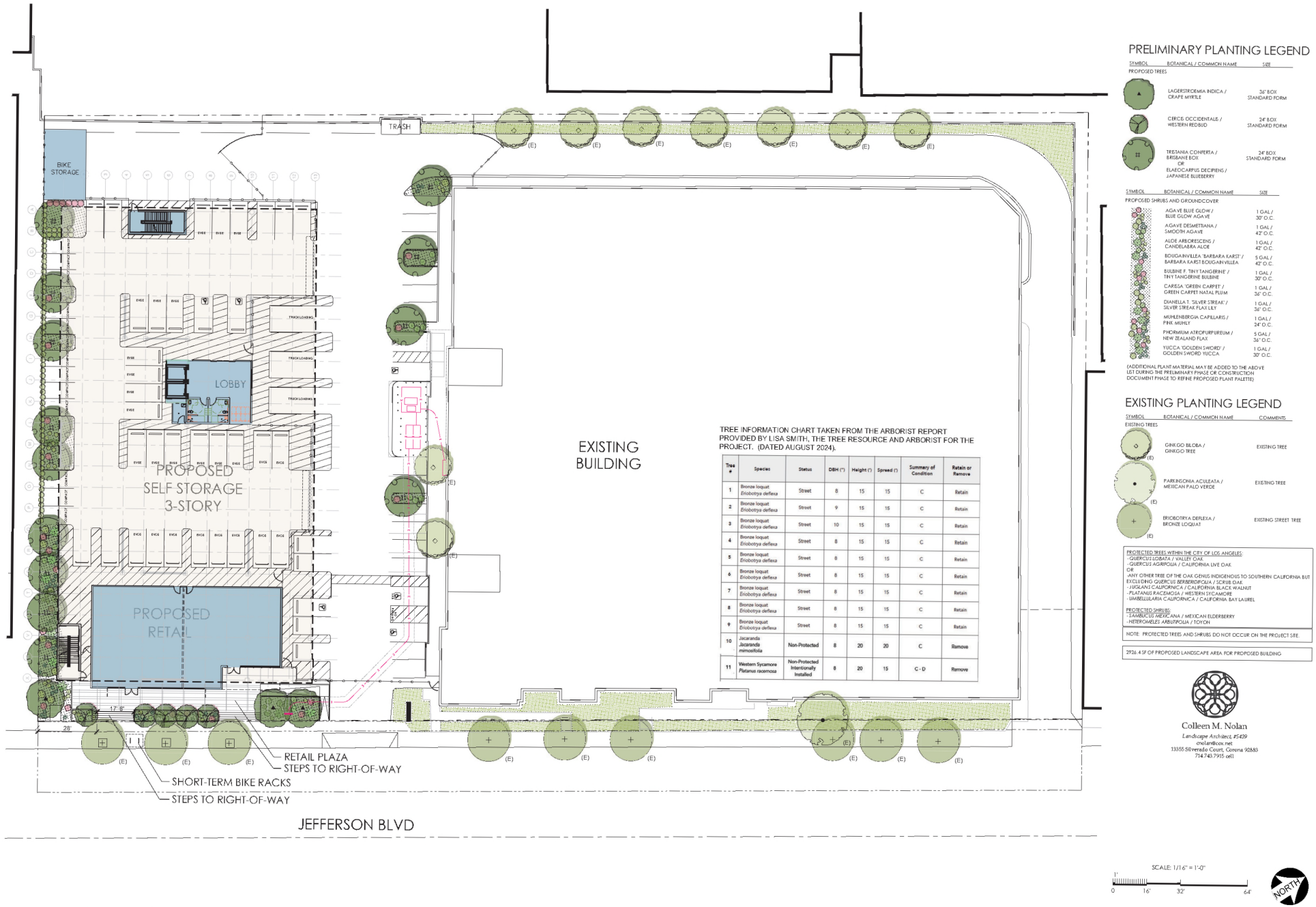
EAST ELEVATION

KEYNOTES

1	MORIN METAL PANEL SYSTEM PAINTED: PUBLIC STORAGE ORANGE	5	SITECAST CONCRETE	9	TENANT SIGNAGE
2	CLEAR ANODIZED STOREFRONT SYSTEM	6	CONCRETE MASONRY WALL ANGELUS BLOCK, PLACER CREEK	10	SPANDREL GLASS
3	EXTERIOR INSULATION AND FINISH SYSTYM (EIFS) PAINTED: WINTER MOOD, PPG14-16	7	EXTERIOR INSULATION AND FINISH SYSTYM (EIFS) PAINTED: PUBLIC STORAGE ORANGE		
4	METAL COMPOSITE PANEL ALUCOBOND, PURE WHITE - RWW	8	EXTERIOR INSULATION AND FINISH SYSTYM (EIFS) PAINTED: ROLLER COASTER, PPG1008-5		

Source: Ware Malcomb Architecture, 2024.

Figure 3-12
North and East Elevations



TREE INFORMATION CHART TAKEN FROM THE ARBORIST REPORT PROVIDED BY LISA SMITH, THE TREE RESOURCE AND ARBORIST FOR THE PROJECT. (DATED AUGUST 2024).

Tree #	Species	Status	DBH (")	Height (')	Spread (')	Summary of Condition	Retain or Remove
1	Bronze loquat *Eriobotrya deflexa*	Street	8	15	15	C	Retain
2	Bronze loquat *Eriobotrya deflexa*	Street	9	15	15	C	Retain
3	Bronze loquat *Eriobotrya deflexa*	Street	10	15	15	C	Retain
4	Bronze loquat *Eriobotrya deflexa*	Street	8	15	15	C	Retain
5	Bronze loquat *Eriobotrya deflexa*	Street	8	15	15	C	Retain
6	Bronze loquat *Eriobotrya deflexa*	Street	8	15	15	C	Retain
7	Bronze loquat *Eriobotrya deflexa*	Street	8	15	15	C	Retain
8	Bronze loquat *Eriobotrya deflexa*	Street	8	15	15	C	Retain
9	Bronze loquat *Eriobotrya deflexa*	Street	8	15	15	C	Retain
10	Jacaranda *Jacaranda mimosifolia*	Non-Protected	8	20	20	C	Remove
11	Western Sycamore *Platanus racemosa*	Non-Protected Intentionally Installed	8	20	15	C - D	Remove

PRELIMINARY PLANTING LEGEND

SYMBOL	BOTANICAL / COMMON NAME	SIZE
PROPOSED TREES		
	LAGERSTROEMIA INDICA / CRAPE MYRTLE	36" BOX STANDARD FORM
	CERCIS OCCIDENTALIS / WESTERN REDBUD	24" BOX STANDARD FORM
	TRISTANIA CONFERTA / BRISBANE BOX OR ELAEOCARPUS DECIPIENS / JAPANESE BLUEBERRY	24" BOX STANDARD FORM

SYMBOL	BOTANICAL / COMMON NAME	SIZE
PROPOSED SHRUBS AND GROUNDCOVER		
	AGAVE BLUE GLOW / BLUE GLOW AGAVE	1 GAL / 30" O.C.
	AGAVE DESMETTIANA / SMOOTH AGAVE	1 GAL / 42" O.C.
	ALOE ARBORESCENS / CANDELABRA ALOE	1 GAL / 42" O.C.
	BOUGAINVILLEA 'BARBARA KARST' / BARBARA KARST BOUGAINVILLEA	5 GAL / 42" O.C.
	BULBINE F. TINY TANGERINE' / TINY TANGERINE BULBINE	1 GAL / 30" O.C.
	CARISSA 'GREEN CARPET' / GREEN CARPET NATAL PLUM	1 GAL / 36" O.C.
	DIANELLA T. 'SILVER STREAK' / SILVER STREAK FLAX LILY	1 GAL / 36" O.C.
	MUHLENBERGIA CAPILLARIS / PINK MUHLY	1 GAL / 24" O.C.
	PHORMIUM ATROPURPUREUM / NEW ZEALAND FLAX	5 GAL / 36" O.C.
	YUCCA 'GOLDEN SWORD' / GOLDEN SWORD YUCCA	1 GAL / 30" O.C.

(ADDITIONAL PLANT MATERIAL MAY BE ADDED TO THE ABOVE LIST DURING THE PRELIMINARY PHASE OR CONSTRUCTION DOCUMENT PHASE TO REFINE PROPOSED PLANT PALETTE)

EXISTING PLANTING LEGEND

SYMBOL	BOTANICAL / COMMON NAME	COMMENTS
EXISTING TREES		
(E)	GINKGO BILOBA / GINKGO TREE	EXISTING TREE
(E)	PARKINSONIA ACULEATA / MEXICAN PALO VERDE	EXISTING TREE
(E)	ERIOBOTRYA DEFLEXA / BRONZE LOQUAT	EXISTING STREET TREE

PROTECTED TREES WITHIN THE CITY OF LOS ANGELES:
- *QUERCUS LOBATA* / VALLEY OAK
- *QUERCUS AGRIFOLIA* / CALIFORNIA LIVE OAK
OR
- ANY OTHER TREE OF THE OAK GENUS INDIGENOUS TO SOUTHERN CALIFORNIA BUT EXCLUDING *QUERCUS BERBERIDIFOLIA* / SCRUB OAK
- *JUGLANS CALIFORNICA* / CALIFORNIA BLACK WALNUT
- *PLATANUS RACEMOSA* / WESTERN SYCAMORE
- *UMBELLULARIA CALIFORNICA* / CALIFORNIA BAY LAUREL

PROTECTED SHRUBS:
- *SAMBUCUS MEXICANA* / MEXICAN ELDERBERRY
- *HETEROMELES ARBUTIFOLIA* / TOYON

NOTE: PROTECTED TREES AND SHRUBS DO NOT OCCUR ON THE PROJECT SITE.

2926.4 SF OF PROPOSED LANDSCAPE AREA FOR PROPOSED BUILDING

Colleen M. Nolan
Landscape Architect, #5439
cnolan@cox.net
13355 Silverado Court, Corona 92883
714.743.7915 cell

SCALE: 1/16" = 1'-0"

0 16' 32' 64'

NORTH

Source: Ware Malcomb Architecture, 2025.

Figure 3-13
Preliminary Landscape Plan



Source: Ware Malcomb Architecture, 2024.

Figure 3-14
Rendering 1



Source: Ware Malcomb Architecture, 2024.

Figure 3-15
Rendering 2

3.3.2 Vehicle and Pedestrian Access

A driveway located along the north side of Jefferson Boulevard currently provides vehicular access (inbound and outbound) to the existing building. The same driveway would also provide access to the Project.

Jefferson Boulevard would provide the main pedestrian access to the Project Site. Sidewalks are available on both sides of Jefferson Boulevard adjacent to and in the vicinity of the Project Site. The existing sidewalk/parkway along Jefferson Boulevard adjacent to the Project Site is approximately 12 feet wide. Pedestrian crosswalks adjacent to the Project Site are available at the nearby intersection of Village Drive/Jefferson Boulevard and Westlawn Avenue/Jefferson Boulevard.

3.3.3 Vehicle and Bicycle Parking

The Project would provide a total of 70 vehicle parking spaces and 64 bicycle parking spaces (including 32 long-term spaces and 32 short-term spaces).

3.3.4 Trees

As discussed in greater detail in Section 4 of this IS/MND, a tree report was prepared by a certified arborist in accordance with the City's Tree Preservation Ordinance No. 186,873, and this report is included as Appendix B to this IS/MND. The tree report identified two on-site trees as well as nine street trees adjacent to the Project Site.[1] Of these trees, none are protected species as defined by the City's Projected Tree Ordinance. The Project would include the removal of the two non-protected private property trees, while the street trees would be preserved.

3.3.5 Sustainability Features

The Project would comply with the California Green Building Standards Code (CalGreen) (Part 11 of Title 24, California Code of Regulations). In addition, the Project would include the following sustainability features:

- Interior lights in the self-storage building, except emergency lights, will be operated via motion detector so that they will be off most of the time.
- The self-storage building will be climate-controlled and will only be heated if the interior temperatures reach approximately 55 degrees and cooled only when interior temperatures reach approximately 80 degrees.
- Solar panels to support the power needs of the building.

[1] There was one additional Bronze Loquat Street Tree located in front of the Project Site, but it declined and died and was then removed by the City.

3.3.6 Construction Assumptions

Construction of the Project is anticipated to last approximately 12 months, with the Project becoming operational in 2028. Table 3-1 summarizes the estimated construction schedule. As shown in Table 3-1, construction of the Project would result in approximately 13,541 cubic yards of soil export from the Project Site to a landfill.

Table 3-1
Construction Schedule Assumptions

Phase	Duration	Notes
Demolition	Month 1 (2 weeks)	Removal of approximately 28,500 square feet of asphalt/concrete parking lot hauled approximately 25 miles to landfill in 10-cubic yard capacity trucks.
Site Preparation	Month 1 (2 weeks)	Grubbing and removal of trees, plants, landscaping, and weeds.
Grading	Month 2	Approximately 13,541 cubic yards of soil (including swell factors for topsoil and dry clay) hauled approximately 25 miles to landfill in 10-cubic yard capacity trucks.
Trenching	Months 3-5	Trenching for utilities, including gas, water, electricity, and telecommunications.
Building Construction	Months 5-12	Footings and foundation work (e.g., pouring concrete pads), framing, welding; installing mechanical, electrical, and plumbing. Floor assembly, cabinetry and carpentry, elevator installations, low voltage systems, trash management.
Paving	Month 7	Flatwork, including paving of driveways and walkways
Architectural Coatings	Months 11-12	Application of interior and exterior coatings and sealants.

3.4 REQUESTED PERMITS AND APPROVALS

The list below includes the anticipated requests for approval of the Project. This Initial Study / Mitigated Negative Declaration analyzes impacts associated with the Project and provides environmental review sufficient for all necessary entitlements and public agency actions associated with the Project. The discretionary entitlements, reviews, permits and approvals required to implement the Project include, but are not necessarily limited to, the following:

- Pursuant to Los Angeles Municipal Code ("LAMC") Section 11.5.6, a General Plan Amendment to revise Footnote No. 1 to indicate that Height District 2 is applicable to the Project Site;

- Pursuant to LAMC Section 12.32, a Height District Change to Height District 2, which would allow for the Project Site to be developed with approximately 298,908 square feet of floor area, with a corresponding FAR of 2.1:1;

- Pursuant to LAMC Sections 12.24.W.50 and 12.24.S, a Conditional Use Permit to allow for storage of household goods and to decrease Code parking requirements by 20 percent;

- Pursuant to LAMC Section 12.28, a Zoning Administrator Adjustment for building height to increase building height by up to 20 percent; and

- Pursuant to LAMC Section 16.05, a Site Plan Review.

- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, haul route permits, and sign permits.

3.5 RESPONSIBLE PUBLIC AGENCIES

A Responsible Agency under CEQA is a public agency with some discretionary authority over a project or a portion of it, but which has not been designated the Lead Agency (State CEQA Guidelines Section 15381). The list below identifies whether any responsible agencies have been identified for the Project.

- None.

3.6 RELATED PROJECTS

In this IS/MND, cumulative impact analyses are provided for each environmental issue discussed in Section 4 (Environmental Impact Analysis) and can be found in each respective subsection of Section 4. There are four related projects identified by the City of Los Angeles within 1,000 feet of the Project Site (shown in Figure 3-16).[2]

1. 12777 Jefferson Boulevard; 49,950 square foot office expansion; approximately 670 feet from the Project Site.[3]

2. 5405 Jandy Place; 93,950 square foot office building; approximately 750 feet from the Project Site.

3. 12555 Jefferson Boulevard; adaptive reuse of commercial building; approximately 860 feet from the Project Site.

4. 12575 Beatrice Street; 250,000 square foot office building; approximately 880 feet from the Project Site.

[2] City of Los Angeles, Related Projects Summary from Case Logging and Tracking System, June 2024.

[3] While this project was included on the list of related projects, it has already been built. Nevertheless, to provide a conservative analysis, it has still been included as a related project for purposes of the cumulative analyses contained in this IS/MND.

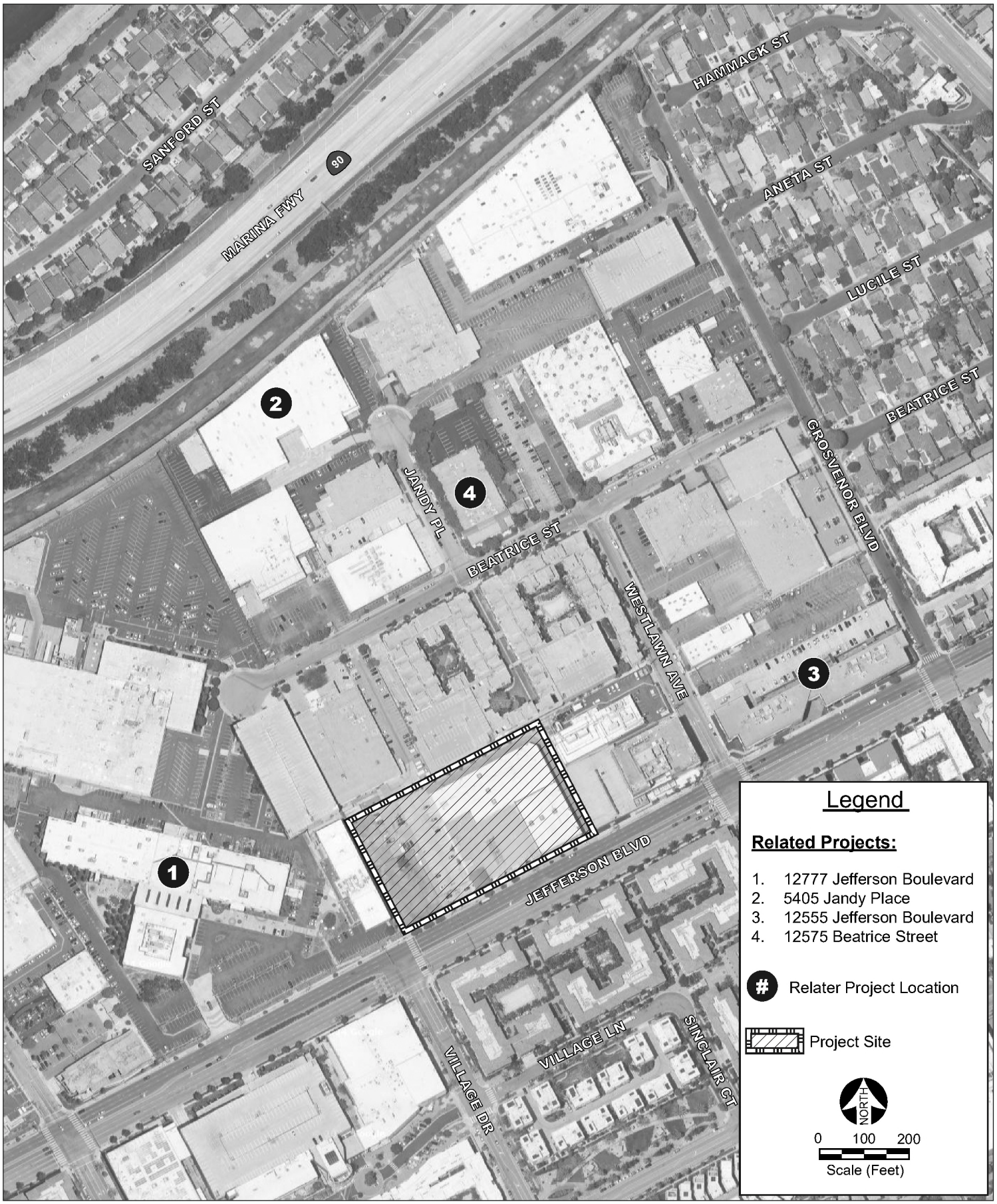


Figure 3-16
Related Projects Location Map

Source: Google Maps 2024.

4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

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

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

No Impact. A significant impact would occur if a project introduced incompatible scenic elements within a field of view containing a scenic vista or substantially block views of an existing scenic vista. As described in the City of Los Angeles CEQA Thresholds Guide, panoramic views or vistas provide visual access to a large geographic area, for which the field of view can be wide and extend into the distance. Panoramic views are usually associated with vantage points looking out over a section of urban or natural area, which provide a geographical orientation not commonly available. Examples of panoramic views might include an urban skyline, valley, mountain range, the ocean, or other water bodies. The Project Site is located in an urbanized portion of Los Angeles and is topographically flat. Streets in the Project area are densely populated with commercial, industrial, and residential uses. Views in the vicinity of the Project Site are largely constrained by the existing structures on the Project Site and structures on adjacent parcels. Therefore, the Project Site is not part of a scenic vista. The Project Site currently contains a four-

story mini-warehouse building, which would remain as part of the Project, and the Project would construct a three-story mini-warehouse building that would be of similar scale and height as the existing building as well as other surrounding commercial, industrial, and residential buildings. As such, the Project would not result in a substantial adverse effect on a scenic vista, and no impact would occur.

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

No Impact. A significant impact would occur only where scenic resources within a state scenic highway would be damaged or removed by a project. The Project Site is not located within a state scenic highway.[1] The nearest state designated scenic highway is Topanga Canyon Boulevard (State Route 27), which is approximately 14 miles from the Project Site. Therefore, no impact would occur.

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

Less Than Significant Impact. The Project Site is located within an urbanized area, and thus, the following analysis will focus on whether the Project will conflict with any applicable zoning and/or other regulations governing scenic quality. As discussed below under "Land Use," the Project requests a General Plan Amendment to revise Footnote No. 1 to indicate that Height District 2 is applicable to the Project Site and a Height District Change to Height District 2. However, these requested changes relate to the allowable floor area ratio (FAR) of the Project Site and are not related to governing scenic quality. In addition, the Project would not conflict with existing zoning and other regulations governing scenic quality for the Project Site. The Project Site is located in the Palms – Mar Vista – Del Rey Community Plan, which contains one goal (Goal 18) related to governing scenic quality, to protect views to the ocean and scenic coastal areas. However, as discussed above, the Project Site is located in an urbanized portion of Los Angeles and is topographically flat and is not located near the ocean or scenic coastal areas. Therefore, the Project would not conflict with the Palms – Mar Vista – Del Rey Community Plan goal governing scenic quality. Streets in the Project area are densely populated with commercial, industrial, and residential uses. Views in the vicinity of the Project Site are largely constrained by the existing structures on the Project Site and structures on adjacent parcels, and there are no views of the ocean available from the Project Site or general Project area. There are no designated scenic vistas at the Project site. The Palms – Mar Vista – Del Rey Community Plan does not contain any other policies with regard to scenic quality, and the Project Site is not subject to other regulations governing scenic quality. Therefore, the Project would not conflict with any

[1] California Department of Transportation, List of Eligible and Officially Designated State Scenic Highways https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways, accessed February 23, 2024.

applicable zoning or other regulations governing scenic quality, and this impact would be less than significant.

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

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

Artificial Light

An adverse impact would occur if a project created a substantial new source of artificial light that would adversely affect the surrounding area. Artificial light may be generated from individual (i.e., point) sources as well as from indirect sources of reflected light. Uses such as residences, hospitals, and hotels are considered light sensitive since they are typically occupied by persons who are subject to disturbance by bright light sources during evening hours. The Project Site and surrounding area are highly urbanized and contain numerous sources of nighttime lighting, including streetlights, security lighting, illuminated signage, indoor building illumination (light emanating from the interior of structures that passes through windows), and automobile headlights. In addition, the existing uses on the Project Site (mini-warehouse, as well as the associated surface parking lot) currently provide a moderate amount of illumination at the Project Site. The Project would involve construction of a new mixed-use mini-warehouse building, which would include indoor building illumination as well as lighting for security. The interior lights in the new mini-warehouse portion of the building, except emergency lights, would be operated via motion detector so that they will be off most of the time. In addition, any exterior building lighting would be designed to confine illumination to the Project Site and would not result in any additional illumination at any light sensitive receptor. Therefore, lighting from the Project Site would be similar to the existing uses, and the Project would not create a substantial new source of artificial light, and this impact would be less than significant.

Glare

An adverse impact would occur if a project created a substantial new source of glare that would adversely affect day or nighttime views in the area. Glare is a common phenomenon in the Southern California area due mainly to the occurrence of a high number of days per year with direct sunlight and the highly urbanized nature of the region, which results in a large concentration of potentially reflective surfaces. Potential reflective surfaces in the Project vicinity include automobiles traveling and parked on streets or in surface parking lots, exterior building windows, and surfaces of brightly painted buildings. Glare currently exists at the Project Site from windows of the existing building as well as automobiles parked in the surface parking lot. The Project would maintain these existing sources of glare and the proposed use would provide a similar amount of glare as currently exists at the Project Site (from the windows on the proposed mini-warehouse building as well as automobiles parked in the proposed surface parking). In addition, all exterior

windows and glass used on Project building surfaces would be non-reflective or treated with an anti-reflective coating to minimize glare. Therefore, glare from the Project Site would be similar to the existing uses, and the Project would not create a substantial new source of glare, and this impact would be less than significant.

Cumulative Impacts

Like the Project, the related projects are subject to applicable development standards, which result in individual review of the visual character of each project, to ensure consistency with design standards and that individual projects are compatible with existing land uses. Therefore, although development of the Project in combination with the related projects would result in a general intensification of land uses in an already urbanized area of the City, the Project would not combine with the related projects to generate a significant cumulative impact with respect to scenic vistas, views, or visual character.

As it relates to light and glare, development of the Project in combination with the related projects would result in an intensification of land uses in an already urbanized area of the City that currently maintains an elevated level of ambient light and glare. As such, the Project and the related projects would contribute to ambient light levels within the surrounding area. However, this is a heavily urbanized area and the presence of additional nighttime illumination resulting from the Project and the related projects would not represent a substantial alteration to the existing nighttime visual environment. For these reasons, cumulative aesthetics impacts would be less than significant.

II. AGRICULTURE AND FORESTRY RESOURCES

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

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

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

No Impact. A significant impact may occur if a project were to result in the conversion of State-designated agricultural land from agricultural use to another non-agricultural use. The California Department of Conservation, Division of Land Protection, lists Prime Farmland, Unique Farmland, and Farmland of Statewide Importance under the general category of "Important Farmland" in California. The Project Site is zoned M2-1 and the General Plan land use designation for the Project Site is Light Industrial. The Project Site is currently partially developed with a mini-warehouse building and an associated surface parking lot. The Project Site is located in a developed and urbanized area and is not included in the Prime Farmland, Unique Farmland, or Farmland of Statewide Importance category.[2] Therefore, no impact would occur.

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

No Impact. A significant impact may occur if a project were to result in the conversion of land zoned for agricultural use or under a Williamson Act Contract from agricultural use to non-agricultural use. The Williamson Act of 1965 allows local governments to enter into agreements with local landowners with the purpose of trying to limit specific parcels of land to agricultural or other related open space use.[3] The Project Site is zoned M2-1 and no Williamson Act contract applies to the Project Site. Therefore, no impact would occur.

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

No Impact. A significant impact may occur if a project were to cause the rezoning of forest land or timberland. The Project Site is currently zoned M2-1 and is not zoned for forest land or timberland. Therefore, no impact would occur.

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

No Impact. A significant impact may occur if a project were to result in the loss of forest land or the conversion of forest land to a non-forest use. The Project Site is currently zoned M2-1, and is currently partially developed with a mini-warehouse building and an associated surface parking

[2] State of California Department of Conservation, Farmland Mapping and Monitoring Program, https://maps.conservation.ca.gov/DLRP/CIFF/, February 21, 2024.

[3] State of California Department of Conservation, Williamson Act Program, website: http://www.conservation.ca.gov/dlrp/lca/Pages/index.aspx, February 21, 2024.

lot. The Project Site is not used as forest land, and therefore, the Project would not result in the loss of forest land or conversion of forest land to non-forest use, and no impact would occur.

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

No Impact. A significant impact may occur if a project results in the conversion of farmland to another non-agricultural use or conversion of forest land to non-forest use. The Project Site is in an area of the City that is urbanized and the Project Site is currently partially developed with a mini-warehouse building and an associated surface parking lot. The Project Site does not contain any agricultural or forest land. As such, the Project would not result in the conversion of farmland to a non-agricultural use or the conversion of forest land to a non-forest use, and no impact would occur.

Cumulative Impacts

As described above, the Project would not result in any impacts related to agricultural and forestry resources, and the Project area is developed with urban land uses. Therefore, the Project could not combine with other projects to result in cumulative impacts, and no cumulative impacts would occur with respect to agricultural and forestry resources.

III. AIR QUALITY

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

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

The analysis in this section is based on the following, which is included in Appendix A of this IS/MND:

A Air Quality Technical Modeling, DKA Planning, June 2024.

Regulatory Framework

Federal

Clean Air Act

The Federal Clean Air Act (CAA) was first enacted in 1955 and has been amended numerous times in subsequent years, with the most recent amendments occurring in 1990. At the federal level, the United States Environmental Protection Agency (USEPA) is responsible for implementing some portions of the CAA (e.g., certain mobile source and other requirements). Other portions of the CAA (e.g., stationary source requirements) are implemented by state and local agencies. In California the California Clean Air Act (CCAA) is administered by the California Air Resources Board (CARB) at the state level and by the air quality management districts and air pollution control districts at the regional and local levels.

The CAA governs the establishment, review, and revision, as appropriate, of the National Ambient Air Quality Standards (NAAQS), which provide protection for the nation's public health and the

environment. NAAQS are based on quantitative characterizations of exposures and associated risks to human health and the environment. The 1990 amendments to the CAA identify specific emission reduction goals for areas not meeting the NAAQS. These amendments require both a demonstration of reasonable further progress towards attainment and the incorporation of additional sanctions for failure to attain or to meet interim milestones. NAAQS have been established for seven major air pollutants: carbon monoxide (CO), nitrogen dioxide (NO_2), ozone (O_3), $PM_{2.5}$ (particulate matter, 2.5 microns), PM_{10} (particulate matter, 10 microns), sulfur dioxide (SO_2), and lead (Pb).

The CAA requires USEPA to designate areas as attainment, nonattainment, or maintenance (previously nonattainment and currently attainment) for each criteria pollutant based on whether the NAAQS have been achieved. The federal standards are shown in Table III-1. USEPA has classified the Los Angeles County portion of the South Coast Air Basin (Basin) as a nonattainment area for O_3, $PM_{2.5}$, and lead.

Table III-1
State and Federal Ambient Air Quality Standards and Attainment for L.A. County

Pollutant	Averaging Period	California		Federal	
		Standard	Attainment Status	Standard	Attainment Status
Ozone – O_3	1-hour	0.09 ppm (180 µg/m^3)	Non-attainment	-	-
	8-hour	0.070 ppm (137 µg/m^3)	Non-attainment	0.070 ppm (137 µg/m^3)	Non-attainment
Respirable Particulate Matter – PM_{10}	24-hour	50 µg/m^3	Non-attainment	150 µg/m^3	Attainment
	Annual Arithmetic Mean	20 µg/m^3	Non-attainment	-	-
Fine Particulate Matter – $PM_{2.5}$	24-hour	-	-	35 µg/m^3	Non-attainment
	Annual Arithmetic Mean	12 µg/m^3	Non-attainment	12 µg/m^3	Non-attainment
Carbon Monoxide – CO	1-hour	20 ppm (23 mg/m^3)	Attainment	35 ppm (40 mg/m^3)	Attainment
	8-hour	9.0 ppm (10 mg/m^3)	Attainment	9 ppm (10 mg/m^3)	Attainment
Nitrogen Dioxide – NO_2	1-hour	0.18 ppm (338 µg/m^3)	Attainment	100 ppb (188 µg/m^3)	Attainment
	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)	Attainment	53 ppb (100 µg/m^3)	Attainment

Sulfur Dioxide – SO_2	1-hour	0.25 ppm (655 µg/m^3)	Attainment	75 ppb (196 µg/m^3)	Attainment
	24-hour	0.04 ppm (105 µg/m^3)	Attainment	-	-
Lead – Pb	30-day average	1.5 µg/m^3	Attainment	-	-
	Calendar Quarter	-	-	0.15 µg/m^3	Non-attainment
Source: Maps of State and Federal Area Designations, https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations. Accessed October 6, 2023.					

State

California Clean Air Act

In addition to being subject to the requirements of the CAA, air quality in California is also governed by more stringent regulations under the California Clean Air Act (CCAA). In California the CCAA is administered by CARB at the state level and by the air quality management districts and air pollution control districts at the regional and local levels. CARB, which became part of the California Environmental Protection Agency in 1991, is responsible for meeting the state requirements of the CAA, administering the CCAA, and establishing the California Ambient Air Quality Standards (CAAQS). The CCAA, as amended in 1992, requires all air districts in the State to achieve and maintain the CAAQS. CAAQS are generally more stringent than their corresponding NAAQS and incorporate additional standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. CAAQS define clean air: they represent the maximum amount of a pollutant averaged over a specified period of time that can be present in outdoor air without any harmful effects on people or the environment.

The CCAA requires CARB to designate areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS thresholds have been achieved. Under the CCAA, areas are designated as nonattainment for a pollutant if air quality data shows that a state standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a state standard and are not used as a basis for designating areas as nonattainment. Under the CCAA, the non-desert Los Angeles County portion of the Basin is designated as a nonattainment area for O_3, PM_{10}, and $PM_{2.5}$. The State standards and attainment/non-attainment are also shown in Table III-1, above.

California Air Toxics Program

CARB's Air Toxics Program was established in 1983 in response to the adoption of AB 1807, the Toxic Air Contaminant Identification and Control Act. AB 1807 directs CARB and the State Office of Environmental Health Hazard Assessment (OEHHA) to identify toxic air contaminants (TACs)

and determine whether any regulatory action is necessary to reduce their risks to public health. Substances formally identified as TACs include diesel particulate matter and environmental tobacco smoke.

Air Quality and Land Use Handbook

Released by CARB in 2005, the *Air Quality and Land Use Handbook: A Community Health Perspective* provides recommendations regarding the siting of new sensitive land uses near potential sources of TACs (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gas stations), as well as the siting of new TAC sources in proximity to existing sensitive land uses.[4] The recommendations are advisory and should not necessarily be interpreted as defined "buffer zones"; if a project or sensitive land uses are within the siting distance, CARB recommends further analysis.

Regional

South Coast Air Quality Management District

The Project is located within the 6,745-square-mile South Coast Air Basin (Basin). The Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. It is bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east; and the San Diego County line to the south. The South Coast Air Quality Management District (SCAQMD) is the agency principally responsible for air pollution control in the Basin. Specifically, SCAQMD is responsible for planning, implementing, and enforcing programs designed to attain and maintain CAAQS established by CARB and NAAQS established by the USEPA. All projects in the SCAQMD jurisdiction are subject to SCAQMD rules and regulations, including, but not limited to, the following:

- Rule 401 Visible Emissions: This rule prohibits air discharge that results in a plume that is as dark as or darker than what is designed as No. 1 Ringelmann Chart by the United States Bureau of Mines for an aggregate of three minutes in any one hour.

- Rule 402 Nuisance: This rule prohibits the discharge of "such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of people or 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."

- Rule 403 Fugitive Dust: This rule mandates that projects reduce the amount of particulate matter entrained in the ambient air as a result of fugitive dust sources by requiring actions to

[4] CARB, Air Quality and Land Use Handbook, A Community Health Perspective, April 2005.

prevent, reduce, or mitigate fugitive dust emissions from any active operation, open storage pile, or disturbed surface area.

- Rule 431.2 Sulfur Content of Liquid Fuels: This rule would require use of low-sulfur fuel in construction equipment.

- Rule 1113 Architectural Coatings: This rule limits the VOC content of architectural coatings.

- In accordance with Section 2485 in Title 13 of the California Code of Regulations, the idling of all diesel-fueled commercial vehicles (with gross vehicle weight over 10,000 pounds) during construction would be limited to five minutes at any location.

- In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines would meet specific fuel and fuel additive requirements and emissions standards.

2022 Air Quality Management Plan

SCAQMD's 2022 Air Quality Management Plan (2022 AQMP) was adopted in December 2022 and represents the most updated regional blueprint for achieving federal air quality standards. It relies on emissions forecasts based on demographic and economic growth projections provided by the Southern California Association of Governments' (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

Southern California Association of Governments

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties that is tasked with addressing regional issues relating to transportation, the economy, community development, and the environment. As the federally designated Metropolitan Planning Organization (MPO) for the six-county Southern California region, SCAG is required by law to ensure that transportation activities conform to, and are supportive of, regional and state air quality plan goals to attain NAAQS. Additionally, SCAG is a co-producer, along with the SCAQMD, of the transportation strategy and transportation control measure sections of the Basin's AQMP. As of April 4, 2024, the 2024-2050 RTP/SCS (Connect SoCal), is SCAG's latest long-range plan, continuing to recognize that transportation investments and future land use patterns are inextricably linked, and acknowledging how this relationship can help the region make choices that sustain existing resources while expanding efficiency, mobility, and accessibility for people across the region. In short, the 2024-2050 RTP/SCS offers a blueprint for how Southern California can grow more sustainably. To this end, the 2024-2050 RTP/SCS land use pattern continues the trend of focusing new housing and employment in the region's High Quality Transit Corridors (HQTCs) and aims to enhance and build out the region's transit network. HQTCs are a cornerstone of land use planning best practice in the SCAG region, and studies have found that focusing development in areas served by transit can result in local, regional, and statewide benefits including reduced air pollution and energy consumption.

Local

City of Los Angeles General Plan Air Quality Element

The City's General Plan Air Quality Element identifies policies and strategies for advancing the City's clean air goals. The Air Quality Element acknowledges the interrelationships among transportation and land use planning in meeting the City's mobility and air quality goals. The Air Quality Element includes six key goals:

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

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

Goal 3: Efficient management of transportation facilities and system infrastructure using cost-effective system management and innovative demand management techniques.

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

Goal 5: Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels, and the implementation of conservation measures including passive measures such as site orientation and tree planting.

Goal 6: Citizen awareness of the linkages between personal behavior and air pollution, and participation in efforts to reduce air pollution.

Pollutants and Effects

State and Federal Criteria Pollutants

Air quality is measured by the ambient air concentrations of seven pollutants that have been identified by the USEPA due to their potentially harmful effects on public health and the environment. These "criteria air pollutants" include carbon monoxide, ground-level ozone, nitrogen dioxide, sulfur dioxide, particulate matter ten microns or less in diameter, particulate matter 2.5 microns or less in diameter, and lead. The following descriptions of each criteria air

pollutant and their health effects are based on information provided by the USEPA and the SCAQMD.[5,6]

Carbon Monoxide – CO

CO is a colorless and odorless gas that is released when something is burned. Outdoors, the greatest sources of CO are cars, trucks, and other vehicles or machinery that burn fossil fuels. Unvented kerosene and gas space heaters, leaking chimneys and furnaces, and gas stoves can release CO and affect air quality indoors. Breathing air with elevated concentrations of CO reduces the amount of oxygen that can be transported via the blood stream and can lead to weakened heart contractions; as a result, CO inhalation can be particularly harmful to people with chronic heart disease. At moderate concentrations, CO inhalation can cause nausea, dizziness, and headaches. High concentrations of CO may be fatal; however, such conditions are not likely to occur outdoors.

Ozone – O_3

O_3 is a colorless gas that is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO_X) undergo slow photochemical reactions in the presence of ultraviolet sunlight. The greatest source of VOC and NO_X emissions is automobile exhaust. O_3 concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperatures are favorable to its formation. Elevated levels of O_3 irritate the lungs and airways and may cause throat and chest pain, as well as coughing, thereby increasing susceptibility to respiratory infections and reducing the ability to exercise. Effects are more severe in people with asthma and other respiratory ailments. Long-term exposure may lead to the scarring of lung tissue and reduced lung efficiency.

Nitrogen Dioxide – NO_2

NO_2 is primarily a byproduct of fossil fuel combustion and is therefore emitted by automobiles, power plants, and industrial facilities. The principal form of nitrogen oxide produced by fossil fuel combustion is nitric oxide (NO), which reacts quickly to form NO_2, creating the mixture of NO and NO_2 commonly called NO_X. NO_2 absorbs blue light and results in reduced visibility and a brownish-red cast to the atmosphere. NO_2 also contributes to the formation of PM_{10}. Nitrogen oxides irritate the nose and throat and increase susceptibility to respiratory infections, especially in people with asthma. Longer exposures to elevated concentrations of NO_2 may even contribute to the development of asthma. The principal concern of NO_X is as a precursor to the formation of ozone.

Sulfur Dioxide – SO_2

[5] USEPA, Criteria Air Pollutants, www.epa.gov/criteria-air-pollutants.

[6] SCAQMD, Final 2022 Air Quality Management Plan, December 2, 2022.

Sulfur oxides (SO_X) are compounds of sulfur and oxygen molecules. SO_2 is the pre-dominant form found in the lower atmosphere and is a product of burning sulfur or sulfur-containing materials. Major sources of SO_2 include power plants, large industrial facilities, diesel vehicles, and oil-burning residential heaters. SO_2 may aggravate lung diseases, especially bronchitis. It also constricts breathing passages, especially in asthmatics and people involved in moderate to heavy exercise. SO_2 may cause wheezing, shortness of breath, and coughing. High levels of particulates appear to worsen the effect of SO_2, and long-term exposure to both pollutants leads to higher rates of respiratory illnesses.

Particulate Matter (PM_{10} and $PM_{2.5}$)

The human body naturally prevents the entry of larger particles into itself. However, smaller particles less than 10 microns (PM_{10}) or even less than 2.5 microns ($PM_{2.5}$) in diameter can enter the body and become trapped in the nose, throat, and upper respiratory tract. Here, these particulates may aggravate existing heart and lung diseases, affect the body's defenses against inhaled materials, and damage lung tissue. Those most sensitive to PM_{10} and $PM_{2.5}$ include children, the elderly, and those with chronic lung and/or heart disease.

Lead – Pb

Airborne lead is emitted from industrial facilities and from the sanding or removal of old lead-based paint. Smelting and other metal processing activities are the primary sources of lead emissions. The lead effects most commonly encountered in current populations are neurological effects in children and cardiovascular effects in adults (e.g., high blood pressure and heart disease). Infants and young children are especially sensitive to even low levels of lead, which may contribute to behavioral problems, learning deficits, and lowered IQ.

Toxic Air Contaminants

Toxic air contaminants (TACs) refer to a diverse group of "non-criteria" air pollutants that can affect human health but have not had ambient air quality standards established for them. This is not because they are fundamentally different from the pollutants discussed above, but because their effects tend to be local rather than regional. CARB and OEHHA determine if a substance should be formally identified, or "listed," as a TAC in California. A complete list of these substances is maintained on CARB's website.

One key TAC is diesel particulate matter (diesel PM), which is emitted in diesel engine exhaust. Released in 2021 by the SCAQMD, the Multiple Air Toxics Exposure Study V (MATES V) determined that about 88 percent of the carcinogenic risk from air toxics in the Basin is attributable to mobile source emissions. Of the three carcinogenic TACs that constitute the majority of the known health risk from motor vehicle traffic – diesel PM from primarily trucks, and benzene and 1,3-butadiene from passenger vehicles – diesel PM is responsible for the greatest potential

cancer risk from vehicle traffic.[7] Overall, diesel PM was found to account for, on average, about 50 percent of the air toxics risk in the Basin.[8] In addition to its carcinogenic potential, diesel PM also may contribute to increased respiratory and cardiovascular hospitalizations, worsened asthma and other respiratory symptoms, decreased lung function in children, and premature death for people already with heart or lung disease. Those most vulnerable to the non-cancer health effects of diesel PM are children whose lungs are still developing and the elderly who may have other chronic health problems.[9]

Volatile Organic Compounds

Volatile organic compounds (VOCs) are typically formed from the combustion of fuels and/or released through the evaporation of organic liquids. Some VOCs are also classified by the state as toxic air contaminants, though there are no VOC-specific ambient air quality standards. Once emitted, VOCs can mix in the air with other pollutants (e.g. NO_X, CO, SO_2) and contribute to the formation of photochemical smog.

Existing Conditions

As discussed earlier, the Project is located within the 6,745-square-mile South Coast Air Basin that includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. Air quality within the Basin is influenced by a wide range of emissions sources, such as dense population centers, heavy vehicular traffic, and industry. These sources in addition to the topography and climate of Southern California combine to make the Basin an area of high air pollution potential. Particularly, ambient pollution concentrations recorded in the Los Angeles County portion of the Basin are among the highest in the four counties comprising the Basin. The USEPA has classified Los Angeles County as a nonattainment area for O_3, $PM_{2.5}$, and lead, meaning that the Basin does not meet NAAQS for these pollutants. Additionally, this portion of the Basin also does not meet CAAQS for O_3, PM_{10}, and $PM_{2.5}$. Table III-1, above, summarizes State and National Ambient Air Quality Standards and the attainment status for Los Angeles County with respect to each criteria pollutant.

Air Quality Monitoring Data

The SCAQMD monitors air quality conditions in 38 source receptor areas ("SRAs") throughout the Basin. The Project is located in SCAQMD's Southwest Coastal LA County receptor area. Table III-2 shows pollutant levels, State and federal standards, and the number of exceedances recorded in the area from 2020 through 2022. As shown, the one-hour State standard for O_3 was exceeded two times during this three-year period. The federal standard was exceeded three times in that same period. In addition, the daily State standard for PM_{10} was exceeded 33 times, all in

[7] CARB, Air Quality and Land Use Handbook: A Community Health Perspective, April 2005.

[8] SCAQMD, Multiple Air Toxics Exposure Study in the South Coast Air Basin (MATES V), 2021.

[9] CARB, Overview: Diesel Exhaust & Health, ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health.

2022. The daily federal standard for $PM_{2.5}$ was exceeded four times. CO and NO_2 levels did not exceed the CAAQS from 2020 to 2022 for 1-hour (and 8-hour for CO).

Table III-2
Ambient Air Quality Data

Pollutants and State and Federal Standards	Maximum Concentrations and Frequencies of Exceedance Standards		
	2020	2021	2022
Ozone (O_3)			
Maximum 1-hour Concentration (ppm)	0.117	0.086	0.108
Days > 0.09 ppm (State 1-hour standard)	1	0	1
Days > 0.070 ppm (Federal 8-hour standard)	2	0	1
Carbon Monoxide (CO_2)			
Maximum 1-hour Concentration (ppm)	1.6	2.6	N/A
Days > 20 ppm (State 1-hour standard)	0	0	0
Maximum 8-hour Concentration (ppm)	1.3	1.9	N/A
Days > 9.0 ppm (State 8-hour standard)	0	0	0
Nitrogen Dioxide (NO_2)			
Maximum 1-hour Concentration (ppm)	0.0597	0.0590	0.0581
Days > 0.18 ppm (State 1-hour standard)	0	0	0
PM_{10}			
Maximum 24-hour Concentration ($\mu g/m^3$)	43	48	128
Days > 50 $\mu g/m^3$ (State 24-hour standard)	0	0	33
$PM_{2.5}$			
Maximum 24-hour Concentration ($\mu g/m^3$)	28.1	42.9	33.7
Days > 35 $\mu g/m^3$ (Federal 24-hour standard)	0	4	0
Sulfur Dioxide (SO_2)			
Maximum 24-hour Concentration (ppb)	6.0	5.9	28.8
Days > 0.04 ppm (State 24-hour standard)	0	0	0

ppm = parts by volume per million of air.
$\mu g/m^3$ = micrograms per cubic meter.
N/A = not available at this monitoring station.
Source: SCAQMD annual monitoring data at Southwest Coastal LA County subregion (http://www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year) accessed February 2, 2024. Where data from this location is not available, the highest measurements from South Coastal LA County areas 1,2, and 4.

Sensitive Receptors

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. Generally speaking, sensitive land uses, or sensitive receptors, are those where sensitive individuals are most likely to spend time. Individuals most susceptible to poor air quality include children, the elderly, athletes, and those with cardiovascular and chronic respiratory diseases. As a result, land uses sensitive to air quality may include schools (i.e., elementary schools or high schools), child care centers, parks and playgrounds, long-term health care facilities, rehabilitation facilities, convalescent facilities, retirement facilities, residences, and athletic facilities.

The Project Site is located on a major residential and commercial arterial in the Playa Vista neighborhood. Sensitive receptors within 0.25 miles of the Project Site include, but are not limited to, the following representative sampling:

- Multifamily residences, 12665 Village Lane, approximately 120 feet south of the Project Site.
- Elementary School, 5456 McConnell Avenue, approximately 630 feet west of the Project Site.
- St. John's Health Center, approximately 780 feet east of the Project Site.

Existing Project Site Emissions

The Project would be located on the currently undeveloped portion of the Project Site. Therefore, there are no emissions of criteria pollutants generated from this portion of the Project Site (the remaining development on the Project Site would be retained as part of the Project).

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

Less Than Significant Impact. This criterion focuses on whether the Project would conflict with the growth assumptions, control measures, and attainment strategy in the adopted 2022 AQMP, including whether the Project would delay timely attainment of air quality standards or emission reductions specified in the AQMP. As described further under subsection (b), the Project's air quality emissions would not result in any exceedances of any state or federal standards. Therefore, the Project would not increase the frequency or severity of an existing violation or cause or contribute to new violations for these pollutants.

The Project would also not delay timely attainment of air quality standards or emission reductions specified in the AQMP, as it would not contribute to growth levels that exceed those that were anticipated and accommodated in the region's attainment plan. With respect to the determination of consistency with AQMP growth assumptions, the projections in the AQMP for achieving air quality goals are based on assumptions in SCAG's 2020-2045 RTP/SCS regarding population, housing, and growth trends. Determining whether or not a project exceeds the assumptions reflected in the AQMP involves the evaluation of three criteria: (1) consistency with applicable population, housing, and employment growth projections; (2) project mitigation measures; and (3) appropriate incorporation of AQMP land use planning strategies. The following discussion provides an analysis with respect to each of these three criteria.

- Is the Project consistent with the population, housing, and employment growth projections upon which AQMP forecasted emission levels are based?

A project is consistent with the AQMP, in part, if it is consistent with the population, housing, and employment assumptions that were used in the development of the AQMP. In the case of the 2022 AQMP, two sources of data form the basis for the projections of air pollutant emissions: the City of Los Angeles General Plan and SCAG's RTP/SCS. The General Plan serves as a comprehensive, long-term plan for future development of the City.

The 2020-2045 RTP/SCS provides socioeconomic forecast projections of regional population growth. The population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on local plans and policies applicable to the specific area; these are used by SCAG in all phases of implementation and review. The 2020-2045 RTP/SCS accommodates 4,771,300 persons; 1,793,000 households; and 2,135,900 jobs in the City of Los Angeles by 2045.

Development of the Project would result in approximately 9 employees on-site.[10] As a result, the on-site increase in jobs would not produce job growth that exceeds the capacity that is accommodated in the l2022 AQMP. As a result, the Project would be consistent with the projections in the AQMP.

- Does the project implement feasible air quality mitigation measures?

As discussed below under Thresholds (b), (c), and (d), the Project would not result in any significant air quality impacts and therefore would not require mitigation. In addition, the Project would comply with all applicable regulatory standards as required by SCAQMD. Furthermore, with compliance with the regulatory requirements identified above, no significant air quality impacts would occur. As such, the proposed Project meets this AQMP consistency criterion.

- To what extent is project development consistent with the land use policies set forth in the AQMP?

With regard to land use developments such as the Project, the AQMP's air quality policies focus on the reduction of vehicle trips and vehicle miles traveled (VMT). The Project would serve to implement a number of land use policies of the City of Los Angeles, SCAQMD, and SCAG. The Project would be designed and constructed to support and promote environmental sustainability. The Project represents an infill development within an existing urbanized area that would concentrate more jobs in a high quality transit area (HQTA). "Green" principles are incorporated throughout the Project to comply with the City of Los Angeles Green Building Code and the California Green Building Standards Code (CALGreen) through energy conservation, water conservation, and waste reduction features.

The air quality plan applicable to the Project area is the 2022 AQMP, the current management plan for progression toward compliance with State and federal clean air requirements. The Project

[10] Raju Associates, Inc., Transportation Technical Memorandum, January 31, 2024.

would be required to comply with all regulatory measures set forth by the SCAQMD. Implementation of the Project would not interfere with air pollution control measures listed in the 2022 AQMP. In addition, as demonstrated in the following analyses, the Project would not result in significant emissions that would jeopardize regional or localized air quality standards.

The Project Site is classified as Light Industrial in the General Plan, a classification that allows self-storage and retail uses such as those proposed by the Project. As such, the RTP/SCS' assumptions about growth in the City accommodate the projected jobs on the Project Site. As a result, the Project would be consistent with the growth assumptions in the City's General Plan. Because the AQMP accommodates growth forecasts from local General Plans, the emissions associated with this Project are accounted for and mitigated in the region's air quality attainment plans. The Project is consistent with the current land use designations as described in the Community Plan and would not generate employment growth beyond the RTP/SCS employment projections. The air quality impacts of development on the Project Site are accommodated in the region's emissions inventory for the 2020-2045 RTP/SCS and 2022 AQMP. Therefore, Project impacts with respect to AQMP consistency would be less than significant.

City of Los Angeles Policies

In addition to the 2022 AQMP and 2024-2050 RTP/SCS, the City of Los Angeles General Plan Air Quality Element also identifies policies and strategies for advancing the City's clean air goals. As shown below in Table III-3, the Project would be consistent with the applicable policies of the Air Quality Element.

Table III-3
Project Consistency with City of Los Angeles General Plan Air Quality Element

Strategy	Project Consistency
Policy 1.3.1. Minimize particulate emissions from construction sites.	**Consistent.** The Project would minimize particulate emissions during construction through best practices and/or SCAQMD rules (e.g., Rule 403, Fugitive Dust).
Policy 1.3.2. Minimize particulate emissions from unpaved roads and parking lots associated with vehicular traffic.	**Not Applicable.** The Project would not involve use of unpaved roads or parking lots.
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 would include storage and retail employees that could access transportation options to driving to work. The Project Site is well-served by public transit, with three bus lines (Metro Line 110, LADOT Commuter Express 437B, Culver City Bus CC4) with stops one block from the Project Site. Employees can benefit from the 32 short- and 32 long-term bicycle parking spaces provided on-site.
Policy 2.1.2. Facilitate and encourage the use of telecommunications (i.e., telecommuting) in both the public and private sectors, in order to reduce work trips.	**Consistent.** Administrative employees could use high-speed telecommunications services as an alternative to driving to work. A June 2020 study by the National Bureau of Economic Research found that 37 percent of

Table III-3
Project Consistency with City of Los Angeles General Plan Air Quality Element

Strategy	Project Consistency
	jobs can be performed entirely from home (https://www.nber.org/papers/w26948). As such, the Project could help reduce commuting to work through telecommuting.
Policy 2.2.1. Discourage single-occupant vehicle use through a variety of measures such as market incentive strategies, mode-shift incentives, trip reduction plans and ridesharing subsidies.	**Consistent.** While the Project does not offer market-based incentives, employees and visitors can use alternatives to driving, including public transit, with three bus lines (Metro Line 110, LADOT Commuter Express 437B, Culver City Bus CC4) with stops one block from the Project Site. Employees and visitors can benefit from the 32 short- and 32 long-term bicycle parking spaces provided on-site. Class II bicycle lanes on Millennium Drive one block south of the Project Site would also support bicycling.
Policy 2.2.2. Encourage multi-occupant vehicle travel and discourage single-occupant vehicle travel by instituting parking management practices.	**Consistent.** While the Project does not offer parking management programs, employees and visitors can use alternatives to driving, including public transit, with three bus lines (Metro Line 110, LADOT Commuter Express 437B, Culver City Bus CC4) with stops one block from the Project Site. Employees and visitors can benefit from the 32 short- and 32 long-term bicycle parking spaces provided on-site.
Policy 2.2.3. Minimize the use of single-occupant vehicles associated with special events or in areas and times of high levels of pedestrian activities.	**Not Applicable.** The Project would not include facilities for special events.
Policy 3.2.1. Manage traffic congestion during peak hours.	**Consistent.** The Project is a low traffic generator because of the nature of self-storage facilities, with ancillary retail space, which would generate a fraction of the vehicle trips of a retail, commercial, or even residential project. For example, the bulk of storage trips would occur in the mid-day off-peak periods. Further, employees and visitors can use alternatives to driving, including public transit, with three bus lines (Metro Line 110, LADOT Commuter Express 437B, Culver City Bus CC4) with stops one block from the Project Site. Employees and visitors can benefit from the 32 short- and 32 long-term bicycle parking spaces provided on-site.
Policy 4.1.1. Coordinate with all appropriate regional agencies on the implementation of strategies for the integration of land use, transportation, and air quality policies.	**Consistent.** The Project is being entitled through the City of Los Angeles, which coordinates with SCAG, Metro, and other regional agencies on land use, air quality, and transportation policies.
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 entitled and environmentally cleared at the local level. The Project would not inhibit the implementation of this policy.

Table III-3
Project Consistency with City of Los Angeles General Plan Air Quality Element

Strategy	Project Consistency
Policy 4.2.1. Revise the City's General Plan/Community Plans to achieve a more compact, efficient urban form and to promote more transit-oriented development and mixed-use development.	**Not Applicable.** This policy calls for City updates to its General Plan. The Project would not inhibit the implementation of this policy.
Policy 4.2.2. Improve accessibility for the City's residents to places of employment, shopping centers and other establishments.	**Consistent.** The Project would be infill development that would provide the City's residents with proximate access to jobs and services at this Project Site.
Policy 4.2.3. Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.	**Consistent.** The Project would promote public transit, active transportation, who can use alternatives to driving. This includes three bus lines (Metro Line 110, LADOT Commuter Express 437B, Culver City Bus CC4) with stops one block from the Project Site. Employees can benefit from the 32 short- and 32 long-term bicycle parking spaces on-site. Class II bicycle lanes on Millennium Drive one block south of the Project Site would also support bicycling.
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 document, and as discussed herein, all impacts with respect to air quality would be less than significant.
Policy 4.2.5. Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.	**Consistent.** The Project would support the use of alternative transportation modes for employees and visitors, who can use alternatives to driving. This includes public transit, with three bus lines (Metro Line 110, LADOT Commuter Express 437B, Culver City Bus CC4) with stops one block from the Project Site. Employees and visitors can benefit from the 32 short- and 32 long-term bicycle parking spaces provided on-site.
Policy 4.3.1. Revise the City's General Plan/Community Plans to ensure that new or relocated sensitive receptors are located to minimize significant health risks posed by air pollution sources.	**Not Applicable.** This policy calls for City updates to its General Plan. The Project would not inhibit the implementation of this policy.
Policy 4.3.2. Revise the City's General Plan/Community Plans to ensure that new or relocated major air pollution sources are located to minimize significant health risks to sensitive receptors.	**Not Applicable.** This policy calls for City updates to its General Plan. The Project would not inhibit the implementation of this policy.
Policy 5.1.1. Make improvements in Harbor and airport operations and facilities in order to reduce air emissions.	**Not Applicable.** This policy calls for cleaner operations of the City's water port and airport facilities. The Project would not inhibit the implementation of this policy.
Policy 5.1.2. Effect a reduction in energy consumption and shift to non-polluting sources of energy in its buildings and operations.	**Not Applicable.** This policy calls for cleaner operations of the City's buildings and operations. The Project would not inhibit the implementation of this policy.

Table III-3
Project Consistency with City of Los Angeles General Plan Air Quality Element

Strategy	Project Consistency
Policy 5.1.3. Have the Department of Water and Power make improvements at its in-basin power plants in order to reduce air emissions.	**Not Applicable.** This policy calls for cleaner operations of the City's Water and Power energy plants. The Project would not inhibit the implementation of this policy.
Policy 5.1.4. Reduce energy consumption and associated air emissions by encouraging waste reduction and recycling.	**Consistent.** The Project would be consistent with this policy by complying with Title 24, CALGreen, and other requirements to reduce solid waste and energy consumption. This includes the City's March 2010 ordinance (Council File 09-3029) that requires all mixed construction and demolition waste be taken to City-certified waste processors.
Policy 5.2.1. Reduce emissions from its own vehicles by continuing scheduled maintenance, inspection and vehicle replacement programs; by adhering to the State of California's emissions testing and monitoring programs; by using alternative fuel vehicles wherever feasible, in accordance with regulatory agencies and City Council policies.	**Not Applicable.** This policy calls for the City to gradually reduce the fleet emissions inventory from its vehicles through use of alternative fuels, improved maintenance practices, and related operational improvements.
Policy 5.3.1. Support the development and use of equipment powered by electric or low-emitting fuels.	**Consistent.** The Project would be designed to meet the applicable requirements of the States Green Building Standards Code and the City of Los Angeles' Green Building Code, and natural gas would not be used at the site.
Policy 6.1.1. Raise awareness through public-information and education programs of the actions that individuals can take to reduce air emissions.	**Not Applicable.** This policy calls for the City to promote clean air awareness through its public awareness programs. The Project would not inhibit the implementation of this policy.
Source: DKA Planning, 2024.	

Conclusion

To summarize the analysis in response to Threshold (a): (1) Project-related growth would be consistent with 2022 AQMP projections that are based on 2020-2045 RTP/SCS projections; (2) the Project would be consistent with the latest regional land use planning strategies to reduce VMT and associated air emissions; (3) to be discussed below, air emissions associated with the Project's construction and operations would neither exceed nor contribute to any exceedance of ambient air quality standards and thresholds, nor would they interfere with the AQMP's attainment of air quality standards or interim emissions reductions. As a result, the Project would not conflict with or obstruct the implementation of any applicable air quality plans, and its impact with respect to Threshold (a) would be less than significant.

b. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Less Than Significant Impact. A significant impact could occur if the Project would add a considerable cumulative contribution to Federal or State nonattainment pollutants. The Project would contribute to local and regional air pollutant emissions during its construction (short-term) and operations (long-term) as illustrated in Tables III-5 and III-6, respectively. However, as discussed in the following analysis, construction and operations of the Project would not result in exceedances of SCAQMD daily thresholds for project-specific impacts that could subsequently cause cumulatively considerable increases in emissions of pollutants for which the Basin is designated as non-attainment.

Construction

Construction-related emissions were estimated using the SCAQMD's CalEEMod 2022.1.1.24 model and a projected construction schedule of approximately 12 months. Table III-4 summarizes the estimated construction schedule that was modeled for air quality impacts.

Table III-4
Construction Schedule Assumptions

Phase	Duration	Notes
Demolition	Month 1 (2 weeks)	Removal of approximately 28,500 square feet of asphalt/concrete parking lot hauled approximately 25 miles to landfill in 10-cubic yard capacity trucks.
Site Preparation	Month 1 (2 weeks)	Grubbing and removal of trees, plants, landscaping, and weeds.
Grading	Month 2	Approximately 13,541 cubic yards of soil (including swell factors for topsoil and dry clay) hauled approximately 25 miles to landfill in 10-cubic yard capacity trucks.
Trenching	Months 3-5	Trenching for utilities, including gas, water, electricity, and telecommunications.
Building Construction	Months 5-12	Footings and foundation work (e.g., pouring concrete pads), framing, welding; installing mechanical, electrical, and plumbing. Floor assembly, cabinetry and carpentry, elevator installations, low voltage systems, trash management.
Paving	Month 7	Flatwork, including paving of driveways and walkways
Architectural Coatings	Months 11-12	Application of interior and exterior coatings and sealants.
Source: DKA Planning, 2024.		

The Project would be required to comply with the following regulations, as applicable:

- SCAQMD Rule 402, which states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other materials 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.

- SCAQMD Rule 403, which would reduce the amount of particulate matter entrained in ambient air as a result of anthropogenic fugitive dust sources by requiring actions to prevent, reduce or mitigate fugitive dust emissions.

- SCAQMD Rule 1113, which limits the VOC content of architectural coatings.

- In accordance with Section 2485 in Title 13 of the California Code of Regulations, the idling of all diesel-fueled commercial vehicles (with gross vehicle weight over 10,000 pounds) during construction would be limited to five minutes at any location.

- In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines would meet specific fuel and fuel additive requirements and emissions standards.

Regional Emissions

Construction activity creates air quality emissions through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the Project Site. NO_X emissions would primarily result from the use of construction equipment and truck trips. Fugitive dust emissions would peak during grading activities, where approximately 13,541 cubic yards of soil (including swell factors for topsoil and clay) would be exported from the Project Site to accommodate a one-level subterranean structure. All construction projects in the Basin must comply with SCAQMD Rule 403 for fugitive dust. Rule 403 control requirements include measures to prevent the generation of visible dust plumes. Measures include, but are not limited to, applying water and/or soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system or other control measures to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project Site, and maintaining effective cover over exposed areas. Compliance with Rule 403 would reduce regional $PM_{2.5}$ and PM_{10} emissions associated with construction activities by approximately 61 percent. During the building finishing phase, the application of architectural coatings (e.g., paints) would release VOCs (regulated by SCAQMD Rule 1113). The assessment of construction air quality impacts considers each of these potential sources.

Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions. As shown in Table III-5, construction of the Project would produce VOC, NO_X, CO, SO_X, PM_{10} and $PM_{2.5}$ emissions that do not exceed the SCAQMD's regional thresholds. As a result, construction of the Project

would not contribute substantially to an existing violation of air quality standards for regional pollutants (e.g., ozone), and this impact would be less than significant.

Localized Emissions

In addition to maximum daily regional emissions, maximum localized (on-site) emissions were quantified for each construction activity. The localized construction air quality analysis was conducted using the methodology promulgated by the SCAQMD. Look-up tables provided by the SCAQMD were used to determine localized construction emissions thresholds for the Project.[11] LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard and are based on the most recent background ambient air quality monitoring data (2010-2022) for the Project area.

Table III-5
Daily Construction Emissions (Unmitigated)

Construction Phase Year	Daily Emissions (Pounds Per Day)					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
2027	1.5	18.9	16.9	0.1	5.0	2.3
2028	19.0	13.4	20.7	<0.1	1.2	0.6
Maximum Regional Total	19.6	18.9	20.8	0.1	5.0	2.3
Regional Threshold	75	100	550	150	150	55
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Maximum Localized Total	19.3	12.2	13.9	<0.1	3.3	1.8
Localized Threshold	N/A	91	664	N/A	5	3
Exceed Threshold?	**N/A**	**No**	**No**	**N/A**	**No**	**No**

The construction dates are used for the modeling of air quality emissions in the CalEEMod software. If construction activities commence later than what is assumed in the environmental analysis, the actual emissions would be lower than analyzed because of the increasing penetration of newer equipment with lower certified emission levels. Assumes implementation of SCAQMD Rule 403 (Fugitive Dust Emissions).
Source: DKA Planning, 2024 based on CalEEMod 2022.1.1.24 model runs. Estimates reflect the maximum daily emissions during summer or winter season, whichever is highest. LST analyses based on 1-acre site with 25-meter distances to receptors in Southwest Coastal LA County source receptor area. Modeling sheets included in Appendix A of this IS/MND.

Maximum on-site daily construction emissions for NO_X, CO, PM_{10}, and $PM_{2.5}$ were calculated using CalEEMod and compared to the applicable SCAQMD LSTs for the Southwest Coastal LA County SRA based on construction site acreage that is less than or equal to one acre. Potential impacts were evaluated at the closest off-site sensitive receptor, which are the residences approximately 120 feet (36.6 meters) to the south of the Project Site at 12665 Village Lane. The closest receptor distance on the SCAQMD mass rate LST look-up tables is 25 meters.

[11] South Coast Air Quality Management District, LST Methodology Appendix C-Mass Rate LST Look-up Table, revised October 2009.

As shown in Table III-5, above, the Project would produce emissions that do not exceed the SCAQMD's recommended localized standards of significance for NO_2 and CO during the construction phase. Similarly, construction activities would not produce PM_{10} and $PM_{2.5}$ emissions that exceed localized thresholds recommended by the SCAQMD. These estimates assume the use of Best Available Control Measures (BACMs) that address fugitive dust emissions of PM_{10} and $PM_{2.5}$ through SCAQMD Rule 403, including watering portions of the Project Site that are disturbed during grading activities and minimizing tracking of dirt onto local streets. Therefore, construction impacts on localized air quality are considered less than significant.

Operation

Operational emissions of criteria pollutants would come from area, energy, and mobile sources. Area sources include consumer products such as cleaners, architectural coatings for routine maintenance, and landscaping equipment. Energy sources include electricity for space heating and water heating. The CalEEMod program generates estimates of emissions from energy use based on the land use type and size. The Project would also produce long-term air quality emissions to the region primarily from motor vehicles that access the Project Site. The Project could add up to 318 vehicle trips to the local roadway network on a weekday at the start of operations in 2028.[12]

As shown in Table III-6, the Project's emissions would not exceed the SCAQMD's regional or localized significance thresholds. Therefore, the Project's operational impacts on regional and localized air quality would be less than significant.

Table III-6
Daily Operational Emissions

Emissions Source	Daily Emissions (Pounds Per Day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area Sources	2.6	<0.1	3.6	<0.1	<0.1	<0.1
Energy Sources	<0.1	0.4	0.4	<0.1	<0.1	<0.1
Mobile Sources	1.1	0.8	9.2	<0.1	2.1	0.6
Regional Total	3.7	1.2	13.1	<0.1	2.2	0.6
Regional Significance Threshold	55	55	550	150	150	55
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Net Localized Total	2.6	0.4	4.1	<0.1	<0.1	<0.1
Localized Significance Threshold	N/A	91	664	N/A	1	1
Exceed Threshold?	**N/A**	**No**	**No**	**N/A**	**No**	**No**

LST analyses based on one-acre site with 25-meter distances to receptors in Southwest Coastal LA County SRA
Source: DKA Planning, 2024 based on CalEEMod 2022.1.1.24 model runs (included in Appendix A to this IS/MND). Totals reflect the summer season maximum and may not add up due to rounding.

[12] City of Los Angeles VMT Calculator, version 1.3 screening analysis.

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

Less Than Significant Impact. As discussed previously, there are several sensitive receptors within 0.25 miles of the Project Site that could be exposed to air pollution from construction and operation of the Project, including, but not limited to, the following representative sampling:

- Multifamily residences, 12665 Village Lane, approximately 120 feet south of the Project Site.
- Elementary School, 5456 McConnell Avenue; 630 feet west of the Project Site.
- St. John's Health Center; 780 feet east of the Project Site.

Construction

As shown in Table III-5, during construction of the Project, maximum daily localized unmitigated emissions of NO_2, CO, PM_{10}, and $PM_{2.5}$ from sources on the Project Site would remain below each of the respective LST values. Unmitigated maximum daily localized emissions would not exceed any of the localized standards for receptors that are within 25 meters of the Project's construction activities. Therefore, based on SCAQMD guidance, localized emissions of criteria pollutants would not have the potential to expose sensitive receptors to substantial concentrations that would present a public health concern.

The primary TAC that would be generated by construction activities is diesel PM, which would be released from the exhaust stacks of construction equipment. The construction emissions modeling conservatively assumed that all equipment present on the Project Site would be operating simultaneously throughout most of the day, while in all likelihood this would rarely be the case. Average daily emissions of diesel PM would be less than one pound per day throughout the course of Project construction. Therefore, the magnitude of daily diesel PM emissions, would not be sufficient to result in substantial pollutant concentrations at off-site locations nearby.

Furthermore, according to SCAQMD methodology, health risks from carcinogenic air toxics are usually described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of TACs over a 30-year period will contract cancer based on the use of standard risk-assessment methodology. The entire duration of construction activities associated with implementation of the Project is anticipated to be approximately 12 months, and the magnitude of daily diesel PM emissions will vary over this time period. No residual emissions and corresponding individual cancer risk are anticipated after construction. Because there is such a short-term exposure period, construction TAC emissions would result in a less than significant impact. Therefore, construction of the Project would not expose sensitive receptors to substantial diesel PM concentrations, and this impact would be less than significant.

Operation

The Project Site would be developed with mini-warehouse and retail uses, land uses that are not typically associated with TAC emissions. Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes (e.g., chrome plating, electrical manufacturing, petroleum refinery). The Project would not include these types of potential industrial manufacturing process sources. It is expected that quantities of hazardous TACs generated on-site (e.g., cleaning solvents, paints, landscape pesticides) for the types of proposed land uses would be below thresholds warranting further study under California Accidental Release Program.

When considering potential air quality impacts under CEQA, consideration is given to the location of sensitive receptors within close proximity of land uses that emit TACs. CARB has published and adopted the Air Quality and Land Use Handbook: A Community Health Perspective, which provides recommendations regarding the siting of new sensitive land uses near potential sources of air toxic emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities).[13] The SCAQMD adopted similar recommendations in its Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning.[14] Together, the CARB and SCAQMD guidelines recommend siting distances for both the development of sensitive land uses in proximity to TAC sources and the addition of new TAC sources in proximity to existing sensitive land uses.

However, the land uses associated with the Project are not considered land uses that generate substantial TAC emissions. It should be noted that the SCAQMD recommends that health risk assessments (HRAs) be conducted for substantial individual sources of DPM (e.g., truck stops and warehouse distribution facilities that generate more than 100 trucks per day or more than 40 trucks with operating transport refrigeration units) and has provided guidance for analyzing mobile source diesel emissions.[15] Based on this guidance, the Project would not include these types of land uses and is not considered to be a substantial source of DPM warranting a refined HRA since daily truck trips to the Project Site would not exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units. In addition, the CARB-mandated airborne toxic control measures (ATCM) limits diesel-fueled commercial vehicles (delivery trucks) to idle for no more than five minutes at any given time, which would further limit diesel particulate emissions.

As the Project would not contain substantial TAC sources and is consistent with the CARB and SCAQMD guidelines, the Project would not result in the exposure of off-site sensitive receptors to carcinogenic or toxic air contaminants that exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0, and potential TAC impacts would be less than significant.

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[13] California Air Resources Board, Air Quality and Land Use Handbook, a Community Health Perspective, April 2005.

[14] South Coast Air Quality Management District, Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, May 6, 2005.

[15] South Coast Air Quality Management District, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis, 2002.

The Project would generate long-term emissions on-site from area and energy sources that would generate negligible pollutant concentrations of CO, NO_2, $PM_{2.5}$, or PM_{10} at nearby sensitive receptors. While long-term operations of the Project would add traffic to local roads that produces off-site emissions, these would not result in exceedances of CO air quality standards at roadways in the area due to three key factors. First, CO hotspots are extremely rare and only occur in the presence of unusual atmospheric conditions and extremely cold conditions, neither of which applies to this Project area. Second, auto-related emissions of CO continue to decline because of advances in fuel combustion technology in the vehicle fleet. Finally, the Project would not contribute to the levels of congestion that would be needed to produce emissions concentrations needed to trigger a CO hotspot, as it would add 382 vehicle trips to the local roadway network on weekdays when the development could be fully leased and operational in 2028.[16] The majority of vehicle-related impacts at the Project Site would come from up to 31 and 57 vehicles entering and exiting the development during the peak A.M. and P.M. hours, respectively.[17] This would represent 0.9 percent of the 3,293 vehicles currently using Jefferson Boulevard at Westlawn Avenue in the A.M. peak hour.[18] Assuming peak hour volumes represent 10 percent of daily volumes, this intersection would carry 32,930 daily vehicle trips, well below the traffic volumes that would be needed to generate CO exceedances of the ambient air quality standard.[19] Therefore, the Project's potential to expose sensitive receptors to substantial pollutant concentrations would be less than significant.

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

Less Than Significant Impact. The Project would not result in activities that create objectionable odors and would not include any land uses typically associated with unpleasant odors and local nuisances (e.g., rendering facilities, dry cleaners). SCAQMD regulations that govern nuisances (i.e., Rule 402, Nuisances) would regulate any occasional odors associated with on-site uses. As a result, any odor impacts from the Project would be considered less than significant.

Cumulative Impacts

SCAQMD recommends that any construction-related emissions and operational emissions from individual development projects that exceed the project-specific mass daily emissions thresholds

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[16] Raju Associates, Technical Memorandum: Public Storage Expansion Project – 12681 W. Jefferson Boulevard, January 2024.

[17] Ibid.

[18] DKA Planning 2023, based on City of Los Angeles database of traffic volumes on Jefferson Boulevard at Westlawn Avenue, https://navigatela.lacity.org/dot/traffic_data/automatic_counts/JEFFERSON.WESTLAWN.180418.pdf, 2018 traffic counts adjusted by one percent growth factor to represent existing conditions.

[19] South Coast Air Quality Management District; 2003 AQMP. As discussed in the 2003 AQMP, the 1992 CO Plan included a CO hotspot analysis at four intersections in the peak A.M. and P.M. time periods, including Long Beach Boulevard and Imperial Highway (Lynwood), Wilshire Boulevard and Veteran Avenue (Westwood), Sunset Boulevard and Highland Avenue (Hollywood), and La Cienega Boulevard and Century Boulevard (Inglewood). The busiest intersection was Wilshire and Veteran, used by 100,000 vehicles per day. The 2003 AQMP estimated a 4.6 ppm one-hour concentration at this intersection, which meant that an exceedance (20 ppm) would not occur until daily traffic exceeded more than 400,000 vehicles per day.

identified above also be considered cumulatively considerable.[20] Individual projects that would not generate emissions in excess of SCAQMD's significance thresholds would not contribute considerably to any potential cumulative impact. SCAQMD neither recommends quantified analyses of the emissions generated by a set of cumulative development projects nor provides thresholds of significance to be used to assess the impacts associated with these emissions. As shown above, the Project's emissions would not exceed any of the SCAQMD's regional or localized significance thresholds. Therefore, the Project's contribution to cumulative air quality impacts would be less than significant.

[20] SCAQMD, White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution, http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper.pdf, August 2003.

IV. BIOLOGICAL RESOURCES

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

The analysis in this section is based in part on the following, which is included in Appendix B of this IS/MND:

B Tree Report, The Tree Resource, April 21, 2025

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

No Impact. A significant impact would occur if a project would remove or modify habitat for any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the State or federal regulatory agencies cited above. The Project Site is located in an urbanized and developed area of the City, and is currently developed with a mini-warehouse building and a surface parking lot. The Project Site does not contain any natural open spaces, act as a wildlife corridor, nor possess any areas of significant biological resource value.[21] No hydrological features are present on the Project Site and there are no sensitive habitats present. Due to the urbanized nature of the Project Site and surrounding area, the Project Site does not support habitat for candidate, sensitive, or special status species identified in local plans, policies, or regulations by the California Department of Fish and Wildlife (CDFW), the California Native Plant Society (CNPS), or the U.S. Fish and Wildlife Service (USFWS). Therefore, no impact would occur.

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

No Impact. A significant impact would occur if riparian habitat or any other sensitive natural community identified locally, regionally, or by the State and federal regulatory agencies cited would be adversely modified by a project. As discussed above, the Project Site and surrounding area are located in an urbanized setting. No riparian areas or other sensitive natural communities are located on the Project Site. The nearest riparian habitat is Ballona Creek, which is located approximately 1,800 feet north of the Project Site, and the nearest sensitive natural community is the Ballona Wetlands, located approximately 4,800 feet west of the Project Site. Intervening development separates the Project Site from both the Ballona Creek and the Ballona Wetlands, and thus, implementation of the Project would not result in any adverse effect on riparian habitat or other sensitive natural communities, and no impact would occur.

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

No Impact. A significant impact would occur if federally protected wetlands, as defined by Section 404 of the Clean Water Act, would be modified or removed by a project. A review of the National

[21] NavigateLA, Significant Ecological Area layer: http://navigatela.lacity.org/navigatela/, accessed March 20, 2024.

Wetlands Inventory identified no wetlands or water features on the Project Site. Therefore, no impact would occur.[22]

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

Less Than Significant Impact. A significant impact would occur if a project would interfere or remove access to a migratory wildlife corridor or impede the use of native wildlife nursery sites. The Project Site is located within an urban area and is currently developed with a mini-warehouse building and surface parking lot, and does not interfere substantially with the movement of any native resident or migratory birds. According to the tree report prepared for the Project Site (included as Appendix B to this IS/MND), there are two trees located on the Project Site (one Western Sycamore and one Jacaranda). The Project would remove the Western Sycamore tree and the Jacaranda tree and preserve the nine existing street trees. During Project construction activities, the removal of these trees would comply with the Migratory Bird Treaty Act (MBTA), which regulates vegetation removal during the nesting season to ensure that significant impacts to migratory birds would not occur. To the extent that vegetation removal activities must occur during the nesting season (February 1 through August 31), a biological monitor would be present during the removal activities to ensure that no active nests would be impacted. If any active nests are detected, the area would be flagged with a buffer (ranging between 50 and 300 feet, as determined by the monitoring biologist), and the area would be avoided until the nesting cycle has been completed or the monitoring biologist has determined that the nest has failed. With compliance with existing regulatory requirements, impacts to nesting and migratory birds would be less than significant.

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

Less Than Significant Impact. A significant adverse impact would occur if a project were inconsistent with local regulations pertaining to biological resources. Local ordinances protecting biological resources are limited to the City of Los Angeles Protected Tree Ordinance, as modified by Ordinance No. 177404. The amended Protected Tree Ordinance provides guidelines for the preservation of all Oak trees indigenous to California (excluding the Scrub Oak or *Quercus dumosa*) as well as the following tree species: Southern California Black Walnut *(Juglans californica var. californica)*; Western Sycamore *(Platanus racemosa)*; and California Bay *(Umbellularia californica)*.[23] In addition, in December 2020, Mexican Elderberry (*Sambucus Mexicana*) and Toyon (*Heteromeles arbutifolia*) were added to the class of "protected trees" (Ordinance No. 186873). According to the tree report prepared for the Project Site (included as

[22] U.S. Fish & Wildlife Service, National Wetlands Inventory: http://www.fws.gov/wetlands/data/mapper.HTML, accessed February 21, 2024.

[23] City of Los Angeles, Ordinance No. 177404, effective April 23, 2006.

Appendix B of this IS/MND), there are two trees on the Project Site and nine street trees adjacent to the Project Site. Of these on-site trees, none are protected species as defined by the City's Projected Tree Ordinance. The Project would include the removal of two on-site non-protected trees, while the street trees would be preserved. The existing trees that would be removed as part of Project construction would be replaced according to City requirements. As none of the trees located on the Project Site are protected trees, impacts would be less than significant impact.

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

No Impact. A significant impact would occur if a project would be inconsistent with policies in any draft or adopted conservation plan. The Project Site is located in an urbanized area of the City, and is currently developed with a mini-warehouse facility and an associated surface parking lot. The Project Site is not subject to a Habitat Conservation Plan, a Natural Community Conservation Plan, or other such plan.[24] Thus, the Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan or other approved local, regional, or state habitat conservation plan, and no impact would occur.

Cumulative Impacts

The Project Site is located in a highly urban area, and is not part of a wildlife corridor or SEA or subject to a Habitat Conservation Plan, a Natural Community Conservation Plan, or other such plan. As discussed above, the Ballona Creek is approximately 1,800 feet north of the Project Site and the Ballona Wetlands are approximately 4,800 feet west of the Project Site. However, like the Project, none of the related projects would impact either the Ballona Creek or the Ballona Wetlands. It is assumed that like the Project, the related projects would be required to comply with the requirements of the MBTA as well as the City's Protected Tree Ordinance and the City's requirements regarding street tree removal and replacement. Because the Project would not result in any significant impacts related to biological resources, the Project does not have the potential to contribute to any cumulative biological resources impacts. Therefore, cumulative impacts related to biological resources would be less than significant.

[24] City of Los Angeles General Plan Conservation Element, Exhibit B2.

V. CULTURAL RESOURCES

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

The analysis in this section is based in part on the following, which is included in Appendix C of this IS/MND:

C Cultural Resources Inventory, PaleoWest Archaeology, March 7, 2019.

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

No Impact. State CEQA Guidelines Section 15064.5 defines a historical resource as: 1) a resource listed in or determined to be eligible by the State Historical Resources Commission for listing in the California Register of Historical Resources; 2) a resource listed in a local register of historical resources or identified as significant in a historical resource survey meeting certain state guidelines; or 3) an object, building, structure, site, area, place, record or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record. A project-related significant adverse effect would occur if a project were to adversely affect a historical resource meeting one of the above definitions.

The Project would be built on the undeveloped portion of an existing mini-warehouse facility, and the Project Site is not currently listed in the National Register of Historic Places, the California Register of Historical Resources, or as a City of Los Angeles Historic-Cultural Monument. In addition, the existing building was not identified by SurveyLA as appearing eligible to be designated as a historic resource or otherwise requiring further historic preservation review. As such, the Project would result in no impact with respect to historic resources.

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

Less Than Significant Impact. State CEQA Guidelines Section 15064.5 defines significant archaeological resources as resources that meet the criteria for historical resources or resources that constitute unique archaeological resources. A project-related significant impact could occur if a project would significantly affect archaeological resources that fall under either of these categories. The Project Site is located in an urbanized area and has been previously disturbed by past development activities. According to the cultural resources inventory included in Appendix C of this IS/MND, there are no known archaeological sites on the Project Site or within a quarter-mile radius, and the Project Site is located within an urbanized area that has been subject to grading and development in the past. For these reasons, the potential to encounter unique archeological resources is considered low. Nonetheless, should archaeological resources be discovered during grading or construction activities, work will cease in the area of the find until a qualified archaeologist has evaluated the find in accordance with Federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. In addition, the City has established a standard condition of approval to address the inadvertent discovery of archaeological resources with which the Project would comply. Should archaeological resources be inadvertently encountered, this condition of approval provides for temporarily halting construction activities near the discovery so that the find can be evaluated. An archaeologist shall then assess the discovered material(s) and prepare a survey, study, or report evaluating the impact. The Applicant shall then comply with the recommendations of the evaluating archaeologist, and a copy of the archaeological survey or report shall be submitted to the Department of City Planning. Ground-disturbing activities may resume once the archaeologist's recommendations have been implemented to the satisfaction of the archaeologist. In accordance with the condition of approval, all activities would be conducted in accordance with regulatory requirements. Compliance with the above would ensure that Project impacts would be less than significant.

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

Less Than Significant Impact. A project-related significant adverse effect could occur if grading or excavation activities associated with the Project would disturb previously interred human remains. The Project Site is located in an urbanized area that has been subject to grading and development in the past. However, the portion of the Project Site that would accommodate the Project is currently undeveloped. In addition, the Project Site is located within the vicinity of Playa Vista, where Native American remains have been previously unearthed. Should human remains inadvertently be encountered during ground-disturbing activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. If human remains of Native American origin are discovered during Project construction, compliance with State laws, which fall within the jurisdiction of the Native American Heritage Commission (Public Resources Code Section 5097), relating to the disposition of Native American

burials would be required. Work would stop immediately, and the County Coroner would be contacted. In addition, the Project would comply with the City's standard condition of approval for inadvertent discovery of human remains, which states the following:

> **Human Remains Inadvertent Discovery.** In the event that human skeletal remains are encountered at the Project Site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, pursuant to State Health and Safety Code Section 7050.5, which requires that no further ground disturbance shall occur until the County Coroner has made the necessary findings as to the origin and disposition pursuant to California Public Resources Code Section 5097.98. In the event human skeletal remains are discovered during construction or during any ground disturbance activities, the following procedures shall be followed:
>
> Stop immediately and contact the County Coroner:
> 1104 N. Mission Road
> Los Angeles, CA 90033
> 323-343-0512 (8 a.m. to 5 p.m. Monday through Friday) or
> 323-343-0714 (After Hours, Saturday, Sunday, and Holidays)

- If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC).
- The NAHC will immediately notify the person it believes to be the most likely descendent of the deceased Native American.
- The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods as provided in Public Resources Code Section 5097.98. If the Applicant does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.

Compliance with the above would ensure appropriate treatment of any potential human remains discovered during Project construction activities. Therefore, the Project's impacts on human remains would be less than significant.

Cumulative Impacts

As discussed above, the Project would not result in indirect or direct impacts to any significant historical resource. Thus, the Project would not have the potential to contribute toward any significant cumulative impacts related to historic resources. Impacts related to archaeological resources and human remains are site-specific and are assessed on a site-by-site basis. The Project would implement standard City conditions of approval and would comply with State regulations related to the inadvertent discovery of any archaeological resources and/or human remains, if necessary. Like the Project, the related projects would be subject to regulatory requirements related to the inadvertent discovery of archaeological resources and human

remains, and would implement mitigation measures, if necessary. Therefore, cumulative impacts with respect to historical resources, archaeological resources, and human remains would be less than significant.

VI. ENERGY

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

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

Less Than Significant. This analysis relies on Appendix F of the CEQA Guidelines, which was prepared in response to the requirement in Public Resources Code Section 21100(b)(3), which states that an EIR shall include a detailed statement setting forth "[m]itigation measures proposed to minimize significant effects of the environment, including, but not limited to, measures to reduce the wasteful, inefficient, and unnecessary consumption of energy."

In addition, with regard to potential impacts to energy, the *L.A. CEQA Thresholds Guide* states that a determination of significance shall be made on a case-by case basis, considering the following factors:

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

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

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

2. The effects of the project on local and regional energy supplies and on requirements for additional capacity;

3. The effects of the project on peak and base period demands for electricity and other forms of energy;

4. The degree to which the project complies with existing energy standards;

5. The effects of the project on energy resources;

6. The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives;

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

8. Whether the project conflicts with adopted energy conservation plans.

Each of these factors is discussed in detail below, under "Project Impacts."

Project Impacts

1) The prcject's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the prcject including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed.

Construction

Electricity

The Project would have short-term construction impacts, as construction activities would consume relatively minor quantities of electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. This electricity would be supplied to the Project Site by the Los Angeles Department of Water and Power (LADWP) and would be obtained from the existing electrical lines that connect to the Project Site. Where power poles are available, electricity from power poles and/or solar-powered generators rather than temporary diesel or gasoline generators would be used during construction. Overall, construction activities associated with the Project would require limited electricity generation that would not be expected to have an adverse impact on available electricity supplies.

Natural Gas

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

Transportation Energy

Transportation fuels, primarily gasoline and diesel, would be provided by local or regional suppliers and vendors. Project construction contractors would comply with applicable CARB regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. CARB has adopted an Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other TACs. This measure prohibits diesel-fueled commercial vehicles greater than 10,000 pounds from idling for more than five minutes at any given time. CARB has also approved the Truck and Bus regulation (CARB Rules Division 3, Chapter 1, Section 2025, subsection (h)) to reduce NO_X, PM_{10}, and $PM_{2.5}$ emissions from existing diesel vehicles operating in California.[25] In addition to limiting exhaust from idling trucks, CARB recently promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower. The regulation aims to reduce emissions by requiring the installation of diesel soot filters and encouraging the retirement, replacement, or repowering of older, dirtier engines with newer emission-controlled models. Implementation began January 1, 2014, and the compliance schedule requires that best available control technology turnovers or retrofits be fully implemented by 2023 for large and medium equipment fleets and by 2028 for small fleets. Compliance with the above anti-idling and emissions regulations would result in efficient use of construction-related energy and the minimization or elimination of wasteful and unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment would result in less fuel combustion and energy consumption, as would use of haul trucks with larger capacities.

Operation

During operation of the Project, energy would be consumed for multiple purposes, including, but not limited to HVAC, lighting, and the use of electronics, equipment, and machinery. Energy would also be consumed during Project operations related to water usage, solid waste disposal, and vehicle trips.

Electricity

Buildout of the Project would result in an increase in the on-site demand for electricity totaling approximately 1,291,490 kWh per year (refer to Table VI-1). In addition, by 2020, LADWP was required to procure at least 33 percent of their energy portfolio from renewable sources. The

[25] California Air Resources Board, Final Regulation Order, Amendments to the Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and Other Criteria Pollutants from In-Use On-Road Diesel-Fueled Vehicles, http://www.arb.ca.gov/msprog/onrdiesel/documents/tbfinalreg.pdf.

current sources procured by LADWP include wind, solar, and geothermal sources. These sources account for 35.6 percent of LADWP's overall energy mix in 2022, the most recent year for which data are available.[26] This represents the available off-site renewable sources of energy that would meet the Project's energy demand. Furthermore, the Project would incorporate active energy conservation strategies, such as: 1) interior lights in the mini-warehouse building, except emergency lights, will be operated via motion detector so that they will be off most of the time; 2) the self-storage building will be climate-controlled and will only be heated if the interior temperatures reach approximately 55 degrees and cooled only when interior temperatures reach approximately 80 degrees; and 3) solar panels to support the power needs of the building.

Based on LADWP's 2022 Final Power Strategic Long-Term Resource Plan (SLTRP), LADWP forecasts that its total energy sales in the 2027-2028 fiscal year (encompassing the Project's 2028 buildout year) is estimated to be approximately 21,273 GWh of electricity[27] As such, the Project-related increase in annual electricity consumption of 1,291,490 kWh per year would represent approximately 0.006 percent of LADWP's projected sales in the 2027-2028 fiscal year. Thus, there is adequate supply capacity to serve the Project. Therefore, the LADWP's current and planned electricity supplies would be sufficient to support the Project's electricity consumption, and the Project would not require the acquisition of additional electricity supplies beyond those that exist or anticipated by the LADWP. Further, the Project would be in compliance with Title 24 of the CCR (CalGreen) requiring building energy efficiency standards, and would also be in compliance with the LA Green Building Code. Electrical service would be provided in accordance with the LADWP's Rules Governing Water and Electric Service.[28] It should also be noted that the Project's estimated electricity consumption is based on usage rates that do not account for any energy conservation features or updates to the Los Angeles Building Code. This represents a conservative (worst-case scenario) approach. Therefore, actual electricity consumption from the Project would likely be lower than that forecasted. Based on the above analysis, the Project's impacts related to the consumption of electricity would be less than significant.

Table IV-1
Estimated Project Electricity Demand

Land Use	Size	Total (kw-h/yr)[1]
Retail	3,959 sf	39,418
Storage	78,365 sf	1,248,256
Parking	--	3,816
	Total	**1,291,149**

[26] CEC, Utility Annual Power Content Labels for 2022, www.energy.ca.gov/pcl/labels/.

[27] LADWP, 2022 Power Strategic Long-Term Resource Plan, December 2022, Appendix A.

[28] LADWP Rules Governing Water and Electric Service: http://netinfo.ladbs.org/ladbsec.nsf/d3450fd072c7344c882564e5005d0db4/0476e63f972b28e288256b79007c417d/$FILE/Rule%2016-d.pdf.

Table IV-1
Estimated Project Electricity Demand

Land Use	Size	Total (kw-h/yr)[1]
sf =square feet kw-h = kilowatt-hour yr = year		
[1] Calculated via CalEEMod. Refer to Appendix A of this IS/MND.		
Note: LADWP does not provide or comment on generation rates to provide an estimate of demand.		

Natural Gas

The Project would not use any natural gas during operation and therefore would not result in any impact with respect to natural gas consumption.

Transportation Energy

During operation, Project-related traffic would result in the consumption of petroleum-based fuels related to vehicular travel to and from the Project Site. As noted previously, the Project Site is located in an HQTC designated by SCAG that indicates that the Project Site is an appropriate site for increased density and employment opportunities from a "smart growth" regional planning perspective. Further, extensive public bus and rail transit service is provided within the Project area. Transit service in the Project area includes Metro Line 110, LADOT Commuter Express 437B, Culver City Line 4, and the Playa Vista Daily Shuttle. Thus, the existing transit services in the vicinity of the Project Site would provide Project employees and visitors with various public transportation opportunities in lieu of driving. Additionally, the Project would provide bicycle storage areas for employees and visitors.

During Project operations, vehicles traveling to and from the Project Site are also assumed to comply with Corporate Average Fuel Economy (CAFE) fuel economy standards. Project-related vehicle trips would also comply with Pavley and Low Carbon Fuel Standards, which are designed to reduce vehicle GHG emissions but would also result in fuel savings in addition to CAFE standards. It is anticipated that the future Project-related vehicle trips are expected to comply with CAFE standards and CARB's Advanced Clean Cars Program, which would ultimately reduce non-renewable transportation fuel consumption. Project-related vehicles would require a negligible fraction of the total state's transportation fuel consumption. Therefore, Project operations would not result in wasteful, inefficient, and unnecessary consumption of energy.

2) The effects of the prcject on local and regional energy supplies and on requirements for additional capacity.

Construction

As discussed above, electricity would be intermittently consumed during the conveyance of the water used to control fugitive dust, as well as to provide electricity for temporary lighting and other general construction activities. The electricity demand at any given time would vary throughout

the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off to avoid unnecessary energy consumption. As energy consumption during Project construction activities would be relatively negligible, the Project would not likely affect regional energy consumption in years during the construction period.

Operation

As stated above, the Project-related increase in annual electricity consumption would represent approximately 0.006 percent of LADWP's projected sales in 2027-2028. In summary, energy consumption during Project operations would be negligible, and energy requirements would be within LADWP's service provisions.

3) The effects of the prcject on peak and base period demands for electricity and other forms of energy.

Electricity demand during construction and operation of the Project would have a negligible effect on the overall capacity of LADWP's power grid and base load conditions. With regard to peak load conditions, LADWP's power system experienced an all-time high peak of 6,502 MW on August 31, 2017.[29] LADWP also estimates a peak load based on two years of data known as base case peak demand to account for typical peak conditions. Based on LADWP estimates for 2018, the base case peak demand for the power grid is 5,820 MW.[30] In comparison to the LADWP power grid base peak load of 5,820 MW in 2018, the Project would represent approximately 0.002 percent of the LADWP base peak load conditions. In addition, LADWP's annual growth projection in peak demand of the electrical power grid of 0.4 percent would be enough to account for future electrical demand by the Project.[31] Therefore, Project electricity consumption during operational activities would have a negligible effect on peak load conditions of the power grid.

4) The degree to which the prcject complies with existing energy standards.

Although Title 24 requirements typically apply to energy usage for buildings, construction equipment would also comply with Title 24 requirements where applicable. Electricity usage during Project operation presented on Table IV-1 would comply with Title 24 standards and CalGreen Code requirements, as well as the City's Green Building Code. Therefore, Project construction and operational activities would comply with existing energy standards with regards to electricity usage.

With regard to transportation fuels, trucks, and equipment used during proposed construction activities, the Project would comply with CARB's anti-idling regulations as well as the In-Use Off-

[29] LADWP, https://www.ladwp.com/who-we-are/power-system/facts-figures, accessed July 3, 2024.

[30] LADWP, 2018 Retail Electric Sales and Demand Forecast. p. 6.

[31] LADWP, 2018 Retail Electric Sales and Demand Forecast. p. 6.

Road Diesel-Fueled Fleets regulation. Although these regulations are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in efficient use of construction-related energy. During Project operations, vehicles traveling to and from the Project Site are assumed to comply with CAFE fuel economy standards. Project-related vehicle trips would also comply with Pavley and Low Carbon Fuel Standards, which are designed to reduce vehicle GHG emissions but would also result in fuel savings in addition to CAFE standards. Therefore, Project construction and operational activities would comply with existing energy standards with regards to transportation fuel consumption.

5) Effects of the Prcject on Energy Resources

As discussed above, LADWP's electricity generation is derived from a mix of non-renewable and renewable sources such as coal, natural gas, solar, geothermal, wind, and hydropower. LADWP's 2022 SLTRP identifies adequate resources (natural gas, coal) to support future generation capacity. In addition, as also discussed above, the Project would not use any natural gas during either construction or operation, and therefore would not have an effect on natural gas supplies.

Transportation fuels (gasoline and diesel) are produced from crude oil, which is imported from various regions around the world. Based on current proven reserves, crude oil production would be sufficient to meet over 50 years of consumption.[32] The Project would also comply with CAFE fuel economy standards, which would result in more efficient use of transportation fuels (lower consumption). Project-related vehicle trips would also comply with Pavley and Low Carbon Fuel Standards, which are designed to reduce vehicle GHG emissions but would also result in fuel savings in addition to CAFE standards. Therefore, Project construction and operational activities would have a negligible effect on the transportation fuel supply.

Due to the Project Site location, most on-site renewable energy sources would not be feasible to install on-site as there are no local sources of energy from the following sources: biodiesel, biomass hydroelectric and small hydroelectric, digester gas, fuel cells, landfill gas, municipal solid waste, ocean thermal, ocean wave, and tidal current technologies, or multi- fuel facilities using renewable fuels. Additionally, wind-powered energy is not viable on the Project Site due to the lack of sufficient wind in the Los Angeles basin. Specifically, based on a map of California's wind resource potential, the Project Site is not identified as an area with wind resource potential.[33]

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[32] BP Global, https://www.bp.com/en/global/corporate/energy-economics/statistical-review-of-world-energy/oil.html, accessed November 15, 2021.

[33] CEC, National Renewable Energy Laboratory (NREL) Wind Prospector, https://maps.nrel.gov/wind-prospector/#/?aL=kM6jR-%255Bv%255D%3Dt%26qCw3hR%255Bv%255D%3Dt%26qCw3hR%255Bd%255D%3D1&bL=groad&cE=0&lR=0&mC=36.416862115300304%2C-120.421142578125&zL=8, accessed July 3, 2024.

6) The prcject's prcjected transportation energy use requirements and its overall use of efficient transportation alternatives.

Approximately 527,839 thousand barrels of crude oil (approximately 22.2 billion gallons) were supplied to California refineries in 2022.[34] Assuming the same supply of crude oil is provided to California, the Project's estimated consumption would be a small fraction of one percent of available fuel reserves. As noted previously, the Project Site is located in an HQTC designated by SCAG that indicates that the Project Site is an appropriate site for increased density and employment opportunities from a "smart growth" regional planning perspective. Further, extensive public bus and rail transit service is provided within the Project area. Transit service in the Project area includes Metro Line 110, LADOT Commuter Express 437B, Culver City Line 4, and the Playa Vista Daily Shuttle. Thus, the existing transit services in the vicinity of the Project Site would provide Project employees and visitors with various public transportation opportunities in lieu of driving. Additionally, the Project would provide bicycle storage areas for employees and visitors.

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

The City's current Green Building Code requires compliance with the CalGreen Code and California's Building Energy Efficiency Standards (Title 24). The Project would be required to comply with the City's Green Building Code. The City has also adopted several plans and regulations to promote the reduction, reuse, recycling, and conversion of solid waste going to disposal systems. These regulations include the City of Los Angeles Solid Waste Management Policy Plan, the RENEW LA Plan, and the Exclusive Franchise System Ordinance (Ordinance No. 182,986). These solid waste reduction programs and ordinances help to reduce the number of trips associated with hauling solid waste, thereby reducing the amount of petroleum-based fuel consumed. Furthermore, recycling efforts indirectly reduce the energy necessary to create new products made of raw material, which is an energy-intensive process. Thus, through compliance with the City's solid waste recycling programs, the Project would contribute to reduced fuel-related energy consumption.

8) Whether the Prcject conflicts with adopted energy conservation plans.

The Project would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the CalGreen Code and California's Building Energy Efficiency Standards, which have been incorporated into the City's Green Building Code. With regard to transportation uses, the Project design would reduce the VMT throughout the region and encourage use of alternative modes of transportation. As discussed previously, the 2024-2050 RTP/SCS focuses on reducing fossil fuel use by decreasing VMT, reducing building energy use, and increasing use of renewable sources. The Project would be consistent with the energy efficiency policies emphasized in the 2024-2050 RTP/SCS. The Project would provide

[34] California Energy Commission, Oil Supply Sources to California Refineries, https://www.energy.ca.gov/data-reports/energy-almanac/californias-petroleum-market/annual-oil-supply-sources-california, accessed October 25, 2023.

commercial and mini warehouse uses in close proximity to existing public transportation. This is evidenced by the Project Site's location within a designated HQTC. The 2024-2050 RTP/SCS would result in an estimated 8 percent decrease in VMT by 2020 and a 19 percent decrease in VMT by 2035. By meeting and exceeding the SB 375 targets for 2020 and 2035, the 2024-2050 RTP/SCS is expected to fulfill and exceed its portion of SB 375 compliance with respect to meeting the state's GHG emission reduction goals. Thus, consistent with the 2024-2050 RTP/SCS, the Project would reduce VMT and associated petroleum-based fuel. As such, based on the above, the Project would not conflict with adopted energy conservation plans.

Conclusion

As demonstrated in the analysis of the eight criteria discussed above, the Project would not result in any wasteful, inefficient, or unnecessary consumption of energy during construction or operation. The Project's energy requirements would not significantly affect local and regional supplies or capacity. The Project's energy usage during peak and base periods would also be consistent with electricity and natural gas future projections for the region. Electricity generation capacity, and supplies of natural gas and transportation fuels, would also be sufficient to meet the needs of Project-related construction and operations. During operation, the Project would comply with the City's existing energy efficiency requirements under the City's Green Building Code. In summary, the Project's energy demands would not significantly affect available energy supplies and would comply with existing energy efficiency standards. Therefore, Project impacts related to energy use would be less than significant during construction and operation.

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

Less Than Significant Impact. The energy conservation plans and policies relevant to the Project include, but are not limited to, the California Title 24 energy standards, the 2022 CALGreen building code, and the City of Los Angeles Green Building Code. As these conservation policies are mandatory under the City of Los Angeles Building Code, the Project would not conflict with or obstruct implementation of applicable plans for renewable energy or efficiency. In addition, the Project would implement sustainability measures to exceed Title 24 energy efficiency requirements.

With regard to transportation related energy usage, the Project would comply with the goals of SCAG's 2024-2050 RTP/SCS, which incorporates VMT targets established by SB 375. The Project's proximity to existing public transportation would serve to reduce VMT and associated transportation fuel usage within the region. In addition, vehicle trips generated during Project operations would comply with CAFE fuel economy standards. Based on the above, the Project would not conflict with adopted energy conservation plans, or violate State or federal energy standards. Therefore, Project impacts associated with regulatory consistency would be less than significant.

Cumulative Impacts

Electricity

The Project, in conjunction with the related projects, would result in an increased demand for electricity supplies. LADWP's 2022 SLTRP serves as a comprehensive 20-year plan to supply reliable electricity to the City in an environmentally responsible and cost-effective manner. The 2022 SLTRP considers a 20-year planning horizon to guide LADWP as it executes major new and replacement projects and programs. Based on the projections and strategies within the 2022 SLTRP, energy efficiency and solar savings are expected to increase in the future and significantly reduce electricity demands, Thus, LADWP anticipates that it can meet the future demands of cumulative growth within its service area with implementation of regulatory and reliability initiatives and strategic initiatives.

LADWP will continue to pursue and implement energy efficiency programs per SB 350, which has an adopted goal of achieving 50 percent renewable energy sources by 2030. Furthermore, in accordance with current building codes and construction standards, both the Project and the related projects would be required to comply with the energy conservation standards established in Title 24 of the California Administrative Code and the City's Green Building Code. Compliance with Title 24 energy conservation standards, City's Green Building Code, and other energy conservation programs on the local level will further reduce cumulative energy demands. As such, cumulative development would not result in related to potentially significant environmental impacts due to wasteful, inefficient, and unnecessary use of electricity. Therefore, cumulative impacts related to electricity would be less than significant.

Natural Gas

As discussed previously, the Project would not use any natural gas. However, the related projects would result in an increased demand for natural gas supplies. As a public utility provider, SoCalGas continuously analyzes increases in natural gas demands resulting from projected population and employment growth in its service area and it is anticipated that it would be able to meet the needs of future development within the region. The related projects would be reviewed on a case-by-case basis to determine SoCalGas's ability to serve each project. Additionally, compliance with energy conservation standards pursuant to Title 24 would reduce cumulative demand for natural gas resources. As such, cumulative development would not result in related to potentially significant environmental impacts due to wasteful, inefficient, and unnecessary use of natural gas. Therefore, cumulative impacts related to natural gas would be less than significant.

Transportation Energy

The Project, in conjunction with the related projects, could result in a net increased demand for transportation energy. As discussed previously, the NHTSA and CARB have implemented several policies, rules, and regulations to improve vehicle efficiency, increase the use of alternative fuels, and decrease the reliance on fossil fuels. It is anticipated that the future vehicle trips are expected

to comply with CAFE standards and CARB's Advanced Clean Cars Program, which would ultimately reduce non-renewable transportation fuel consumption. Also, the Project and the related projects are located in a transit-rich area of the City and as such, provide opportunities for alternative sources of transportation. Thus, cumulative development would not result in related to potentially significant environmental impacts due to wasteful, inefficient, and unnecessary use of transportation energy. Therefore, cumulative impacts related to transportation energy would be less than significant.

VII. GEOLOGY AND SOILS

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

The analysis in this section is based in part on the following item, which is included as Appendix D of this IS/MND:

D Geotechnical Engineering Exploration and Analysis, Giles Engineering Associates, Inc., March 20, 2024.

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

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

Less Than Significant Impact. Fault rupture occurs when movement on a fault deep within the earth breaks through to the surface. Based on criteria established by the California Geological Survey (CGS), faults can be classified as active, potentially active, or inactive. Active faults are those having historically produced earthquakes or shown evidence of movement within the past 11,000 years (during the Holocene Epoch). Potentially active faults have demonstrated displacement within the last 1.6 million years (during the Pleistocene Epoch) while not displacing Holocene Strata. Inactive faults do not exhibit displacement more recently than 1.6 million years before the present. In addition, there are buried thrust faults, which are faults with no surface exposure. Due to their buried nature, the existence of buried thrust faults is usually not known until they produce an earthquake.

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

According to the Geotechnical Analysis prepared for the Project (included in Appendix D of this IS/MND), the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone, and the possibility of fault rupture through the Project Site is considered to be low.[35] Thus, the Project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the Alquist-Priolo Special Studies Zone Map issued by the State Geologist in 2014 for the area or based on other substantial evidence of a known fault on the Project Site.

Additionally, given that no active or potentially active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site, the Project would not exacerbate existing fault rupture conditions. Construction of the Project would be subject to compliance with existing State and local regulations, including the California Building Code (CBC) and the Los Angeles Building Code (LABC) and with the recommendations contained in the final geotechnical

[35] Geotechnical Analysis, Giles Engineering Associates, Inc., March 20, 2024, page 9.

report prepared for the Project by a licensed engineer and approved by the City of Los Angeles Department of Building and Safety (LADBS). The CBC and LABC, with which the Project would be required to comply, contain construction requirements to ensure that structures are built to a level such that they can withstand acceptable seismic risk. Therefore, the Project would not cause potential substantial adverse effects as a result of a known earthquake fault in or around the Project Site, and Project impacts with respect to fault rupture would be less than significant.

ii. Strong seismic ground shaking?

Less Than Significant Impact. The Project Site is located in the seismically active Southern California region. However, the Project does not include the types of activities, such as mining operations, boring of large areas, the extraction or injection of oil or groundwater, horizontal drilling, or other activities that would cause or exacerbate substantial adverse effects involving strong seismic ground shaking. Given the Project Site's location in a seismically active region, the Project Site could experience seismic ground shaking in the event of an earthquake.

However, as with any new development in the State of California, building design and construction for the Project would be required to conform to the current seismic design provisions of the CBC. The CBC would preclude the Project from employing techniques or methods which would directly or indirectly initiate or worsen seismic ground shaking as part of the normal construction and operations. The CBC incorporates the latest seismic design standards for structural loads and materials as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake and provide for the latest in earthquake safety. Additionally, construction of the Project would be required to adhere to the seismic safety requirements contained in the LABC, as well as the applicable recommendations provided in the geotechnical investigations required by the City to minimize seismic-related hazards. Adherence to current building codes and engineering practices would ensure that the Project would not expose people, property, or infrastructure directly or indirectly to seismically induced ground shaking hazards that are greater than the average risk associated with locations in the Southern California region, and would minimize the potential to expose people or structures to substantial risk, loss, or injury. Based on the above, development of the Project would not exacerbate seismic conditions on the Project Site. With compliance with existing building codes, Project impacts associated with seismic ground shaking would be less than significant.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is a form of earthquake-induced ground failure that occurs primarily in relatively shallow, loose, granular, water-saturated soils. Liquefaction can occur when these types of soils lose their shear strength due to excess water pressure that builds up during repeated seismic shaking. A shallow groundwater table, the presence of loose to medium dense sand and silty sand, and a long duration and high acceleration of seismic shaking are factors that contribute to the potential for liquefaction. Liquefaction usually results in horizontal and vertical movements from lateral spreading of liquefied materials.

According to the Geotechnical Analysis prepared for the Project Site (included in Appendix D of this IS/MND), the Project Site is located within a designated Liquefaction Hazard Zone, according to the Seismic Hazard Evaluation Report for the Venice Quadrangle published by the California Geological Survey. Therefore, a liquefaction analysis was prepared for the Project and is included in the Geotechnical Analysis (included in Appendix D of this IS/MND). The Project Applicant would be required by LADBS, as part of the permitting process, to prepare (or have prepared) a Final Geotechnical Investigation that would confirm the building standards and recommendations that shall be followed in order to construct the proposed structure in accordance with building standards that apply to building within the types of soils found at the Project Site, including areas prone to liquefaction. Through compliance with the LABC and recommendations included in the Final Geotechnical Report, impacts related to liquefaction would be less than significant, and development of the Project would not directly or indirectly cause or exacerbate geologic hazards, including seismic-related liquefaction.

iv. Landslides?

No Impact. The Project Site is relatively flat and according to the geotechnical report (included in Appendix D) and ZIMAS, is not identified as being within a landslide hazard zone.[36] Therefore, the potential for landslides is negligible, and the Project would result in no impact with respect to landslides.

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

Less Than Significant Impact. A significant impact may occur if a project exposes large areas to the erosional effects of wind or water for a protracted period of time. The Project Site is currently developed with a four-story mini-warehouse building and an associated surface parking lot. However, the portion of the Project Site that would accommodate the Project is currently undeveloped. During the Project's construction phase, activities such as excavation for utilities and site preparation could leave soils at the Project Site susceptible to soil erosion. The Project Applicant would be required to comply with SCAQMD Rule 403 – Fugitive Dust to minimize wind and water-borne erosion at the Site, as well as prepare and implement a Stormwater Pollution Prevention Plan (SWPPP), in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities. The site-specific SWPPP would be prepared prior to earthwork activities and would be implemented during Project construction. The SWPPP would include best management practices (BMPs) and erosion control measures to prevent pollution in storm water discharge. Typical BMPs that could be used during construction include good-housekeeping practices (e.g., street sweeping, proper waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, proper handling and storage of hazardous materials, etc.) and erosion/sediment control measures (e.g., silt fences, fiber rolls, gravel bags, storm water inlet protection, and soil stabilization

[36] Geotechnical Analysis, Giles Engineering Associates, Inc., March 20, 2024, page 10.

measures, etc.). The SWPPP would be subject to review and approval by the City for compliance with the City's Development Best Management Practices Handbook, Part A, Construction Activities. Through compliance with these existing regulations, the Project would not result in any significant impacts related to soil erosion during the construction phase.

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

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

Less Than Significant Impact. As discussed previously, the Project Site is located within a designated Liquefaction Hazard Zone, according to the Seismic Hazard Evaluation Report for the Venice Quadrangle. The Project Applicant would be required by LADBS, as part of the permitting process, to prepare (or have prepared) a Final Geotechnical Investigation that would confirm the building standards and recommendations that shall be followed in order to construct the proposed structure in accordance with building standards that apply to building within the types of soils found at the Project Site, including areas prone to liquefaction. In addition, according to the Geotechnical Analysis prepared for the Project Site, the potential for lateral spreading or liquefaction-inducted surface manifestations are considered low.[37]

The Project Applicant would be required by LADBS, as part of the permitting process, to prepare (or have prepared) a Final Geotechnical Investigation that would confirm the building standards and recommendations that shall be followed in order to construct the proposed structure in accordance with building standards that apply to building within the types of soils found at the Project Site, including areas prone to geologic or soil instability. Through compliance with the CBC and LABC, and with recommendations included in the final geotechnical report, impacts related to geologic and soil instability would be less than significant. Based on the above, development of the Project would not cause or exacerbate geologic hazards by being located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and Project impacts would be less than significant.

[37] Geotechnical Engineering Exploration and Analysis, Giles Engineering Associates, Inc., March 20, 2024, page 7.

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?

No Impact. Based on the Geotechnical Analysis prepared for the Project Site, soils at the Project Site are considered to have a very low expansive potential.[38] Therefore, the Project would not cause or exacerbate geologic hazards, and no impact with respect to expansive soils would occur.

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

No Impact. The Project Site is located within a community served by existing sewage infrastructure. The Project would connect to the City's existing sewer system and would not require the use of septic tanks or alternative wastewater disposal systems. Thus, the Project would not result in any impacts related to soils that are incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. Therefore, no impacts related to this issue would occur as a result of the Project.

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

Less Than Significant Impact. A project-related significant adverse effect could occur if grading or excavation activities associated with the Project would disturb paleontological resources or geologic features which presently exist within the Project Site. The Project Site is located in an urbanized area and has been previously disturbed by past development activities and is not known to contain any unique paleontological resource or site or unique geological feature. As such, the likelihood of unearthing unique paleontological resources is considered low. The Project would be required to comply with existing plans and regulations related to the inadvertent discovery of unknown paleontological resources should they be encountered during ground disturbing activities. Those plans and regulations can be found in the General Plan Conservation Element and Section 5097.5 of the Public Resources Code. In addition, the City has established a standard condition of approval to address the inadvertent discovery of paleontological resources. Should paleontological resources be inadvertently encountered, this condition of approval provides for temporarily halting construction activities near the encounter so that the find can be evaluated. A paleontologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The paleontologist shall then assess the discovered material(s) and prepare a survey, study, or report evaluating the find. The Applicant shall then comply with the recommendations of the evaluating paleontologist, and a copy of the paleontological survey or report shall be submitted to the Los Angeles County Museum of Natural History and the Department of City Planning. Ground-

[38] Geotechnical Engineering Exploration and Analysis, Giles Engineering Associates, Inc., March 20, 2024, page 14.

disturbing activities may resume once the paleontologist's recommendations have been implemented to the satisfaction of the paleontologist. In accordance with this condition of approval, all activities would be conducted in accordance with regulatory requirements. Compliance with the above would ensure that Project impacts would be less than significant.

Cumulative Impacts

Geotechnical impacts related to future development in the City involve site-specific soil conditions, erosion, and ground-shaking during earthquakes. The impacts on each site are specific to that site and its users and would not be in common or contribute to (or shared with, in an additive sense) the impacts on other sites. In addition, development on each site is subject to uniform site development as well as CBC and LABC construction standards that are designed to protect public safety. Like the Project, it is assumed that the related projects would be required to comply with CBC and LABC construction standards and requirements. Impacts with respect to paleontological resources are also assessed on a site-by-site basis. All development in the City (including the Project and the related projects) that includes ground-disturbing activities is required to adhere to existing State and City regulations and/or any required mitigation measures related to the discovery of paleontological resources. For these reasons, cumulative impacts related to geology and soils would be less than significant.

VIII. GREENHOUSE GAS EMISSIONS

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

The analysis in this section is based on the following, which is included in Appendix E of this IS/MND:

E Greenhouse Gas Emissions Technical Modeling, DKA Planning, June 2024.

Climate Change Background

Global climate change refers to changes in average climatic conditions on Earth as a whole, including changes in temperature, wind patterns, precipitation, and storms. Global warming, a related concept, is the observed increase in average temperature of Earth's surface and atmosphere. One identified cause of global warming is an increase of GHG emissions in the atmosphere. GHG emissions are those compounds in Earth's atmosphere that play a critical role in determining Earth's surface temperature.

Earth's natural warming process is known as the "greenhouse effect." It is called the greenhouse effect because Earth and the atmosphere surrounding it are similar to a greenhouse with glass panes in that the glass allows solar radiation (sunlight) into Earth's atmosphere but prevents radiative heat from escaping, thus warming Earth's atmosphere. Some levels of GHG emissions keep the average surface temperature of Earth close to a hospitable 60 degrees Fahrenheit. However, it is believed that excessive concentrations of anthropogenic GHG emissions in the atmosphere can result in increased global mean temperatures, with associated adverse climatic and ecological consequences.

GHG Emissions Background

GHG emissions include CO_2, methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), and nitrogen trifluoride (NF_3).[39] Carbon

[39] As defined by California Assembly Bill (AB) 32 and Senate Bill (SB) 104.

dioxide is the most abundant GHG. Other GHG emissions are less abundant but have greater global warming potential than CO_2. Thus, emissions of other GHGs are frequently expressed in their equivalent mass of CO_2, denoted as CO_2e. Forest fires, decomposition, industrial processes, landfills, and the consumption of fossil fuels for power generation, transportation, heating, and cooking are the primary sources of GHG emissions.

Regulatory Framework

There are any number of agreements, strategies, policies, regulations, and standards that relate to GHG emissions – from international climate accords to local climate action plans. Below is a discussion of (1) the plans, policies, and regulations (collectively, the "Applicable GHG Regulations") that are fundamental to determining whether the Project would have a significant impact on GHG emissions, and (2) the existing conditions under the Applicable GHG Regulations.

State

The State legislature, executive office, and administrative agencies have promulgated various regulations, rules, policies, and strategies that govern GHG emissions. Below is a timeline thereof, followed by explanations of each:

- June 2005: Executive Order S-3-05 (EO S-3-05)
- September 2005: Assembly Bill 32 (AB 32) (codified EO S-3-05)
- August 2007: Senate Bill 97 (SB 97)
- September 2008: Senate Bill 375 (SB 375)
- December 2008: CARB adopts Climate Change Scoping Plan (the "AB 32 Scoping Plan" or 2008 Scoping Plan)
- August 2011: CARB adopts Supplemental Functional Equivalent Document to the Climate Change Scoping Plan (the "Supplemental FED")
- May 2014: CARB adopts First Update to the Climate Change Scoping Plan: Building on the Framework (the "First Update" or 2013 Scoping Plan Update)
- April 2015: Executive Order B-30-15 (EO B-30-15)
- September 2016: Senate Bill 32 (SB 32) (codified EO B-30-15)
- November 2017: CARB adopts the 2017 Climate Change Scoping Plan Update: The Strategy for Achieving California's 2030 Greenhouse Gas Target (the "2017 Scoping Plan Update")
- September 2018: Executive Order B-55-18 (EO B-55-18)
- September 2022: Assembly Bill 1297 (AB 1297) (codified EO B-55-18)
- November 2022: CARB adopts the 2022 Scoping Plan for Achieving Carbon Neutrality (the "2022 Scoping Plan Update")

Other regulations would also have an indirect effect on the Project's GHG emissions. The Project's relation to the following regulations would not be determinative of its CEQA significance, but explanations of these regulations are nonetheless provided below for informational purposes:

- SB 350, the Clean Energy and Efficiency Act of 2015
- Cap-and-Trade Program

EO S-3-05

In June 2005, Governor Arnold Schwarzenegger signed EO-S-3-05, which had the goal of reducing the State's GHG emissions to 2000 levels by 2010, to 1990 levels by 2020, and to 80 percent below 1990 levels by 2050.

AB 32

In September 2005, Governor Arnold Schwarzenegger signed the California Global Warming Solutions Act of 2006, AB 32, into law. AB 32 committed the State to achieving the following:

- By 2010, reduce statewide GHG emissions to 2000 levels.[40]
- By 2020, reduce statewide GHG emissions to 1990 levels.

AB 32 required the California Air Resources Board (CARB) to adopt rules and regulations that achieve the maximum technologically feasible and cost-effective GHG emissions reductions. The State achieved its 2020 GHG emissions target of returning to 1990 levels four years earlier than mandated by AB 32.

SB 97

Passed in August 2007, SB 97 required the State Office of Planning and Research (OPR) to prepare and develop CEQA guidelines for the effects and/or mitigation of GHG emissions, including effects associated with transportation and energy consumption. Subsequently, the Draft Guidelines Amendments for Greenhouse Gas Emissions (the "Guidelines Amendments") were adopted in December 2009 to address the specific obligations of public agencies when analyzing GHG emissions to determine a project's effect on the environment, as pursuant to CEQA.

The Guidelines Amendments do not provide thresholds of significance or any specific mitigation measures; rather, they require a lead agency to make a good-faith effort to describe, calculate, or estimate the amount of GHG emissions that would result from a project, to the extent possible based on scientific and factual data. The Guidelines Amendments give discretion to the lead agency whether to (1) use a model or methodology to quantify GHG emissions resulting from a project, and which model or methodology to use, or (2) rely on a qualitative analysis or performance-based standards. Additionally, three factors that should be considered in the evaluation of the significance of GHG emissions are identified:

[40] The 2010 target to reduce GHG emissions to 2000 levels was not met.

(1) The extent to which a project may increase or reduce GHG emissions as compared to the existing environmental setting;

(2) Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and

(3) The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

The administrative record for the Guidelines Amendments also clarifies "that the effects of greenhouse gas emissions are cumulative and should be analyzed in the context of CEQA's requirements for the cumulative impact analysis."[41]

The California Natural Resources Agency is required to periodically update the Guidelines Amendments to incorporate new information or criteria established by CARB pursuant to AB 32. SB 97 applies to any environmental impact report (EIR), negative declaration, mitigated negative declaration, or other document requirement by CEQA.

SB 375

In September 2008, Governor Schwarzenegger signed SB 375, the Sustainable Communities and Climate Protection Act of 2008, to align regional planning for housing and transportation with the GHG reduction goals outlined by AB 32. SB 375 requires each Metropolitan Planning Organization (MPO) to adopt a Sustainable Community Strategy (SCS) encouraging compact development that reduces passenger VMT and trips, all for the purpose of meeting CARB-determined regional GHG emissions reduction targets.

EO-B-30-15

In April 2015, Governor Jerry Brown issued EO B-30-15, which had the goal of reducing the State's GHG emissions to 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050.

SB 32

Signed in September 2016 by Governor Brown, SB 32 updates AB 32 to include an emissions reduction goal for the year 2030. Specifically, SB 32 requires CARB to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. New goals outlined in SB 32 update AB 32's scoping plan requirement and involve increasing renewable energy use, imposing

[41] Letter from Cynthia Bryant, Director of the Governor's Office of Planning and Research, to Mike Chrisman, California Secretary for Natural Resources, dated 13 April 2009.

tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries.

EO B-55-18

On September 10, 2018, Governor Brown issued EO B-55-18, which established a target for California to achieve carbon net neutrality by 2045. EO B-55-18 identifies the statewide goal to achieve and maintain carbon neutrality as soon as possible, and no later than 2045.

AB 1297

Governor Gavin Newsom codified the goals outlined in EO-B-55-18 by his signing of AB 1279 in September 2022. AB 1279 requires the state to reduce statewide anthropogenic GHG emissions to at least 85 percent below 1990 levels and to maintain net negative GHG emissions thereafter. AB 1279 tasks CARB with monitoring and regulating GHG emissions to achieve this goal. AB 1297 represents the State's latest – and most stringent – GHG reduction target.

SB 350

SB 350, signed October 7, 2015, is the Clean Energy and Pollution Reduction Act of 2015. The objectives of SB 350 are: (1) to increase the procurement of electricity from renewable resources from 33 percent to 50 percent by 2030, and (2) to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.[42]

Cap-and-Trade Program

The Scoping Plans identify the Cap-and-Trade Program as one of the strategies California will employ to reduce GHG emissions. Under Cap-and-Trade, an overall limit on GHG emissions from capped sectors is established, and facilities subject to the cap are able to trade permits to emit GHGs. CARB designed and adopted the California Cap-and-Trade Project pursuant to its authority under AB 32.

Climate Change Scoping Plans

The Scoping Plan is a GHG reduction roadmap developed and updated by CARB at least once every five years, as required by AB 32. It lays out the transformations needed across various sectors to reduce GHG emissions and reach the State's climate targets. CARB published the 2022 Scoping Plan Update in November 2022, as the third update to the initial plan that was adopted in 2008. The initial 2008 Scoping Plan laid out a path to achieve the AB 32 target of returning to 1990 levels of GHG emissions by 2020, a reduction of approximately 15 percent below business-as-usual activities. The 2008 Scoping Plan included a mix of incentives, regulations, and carbon pricing, laying out the portfolio approach to addressing climate change

[42] Senate Bill 350 (2015-2016 Re. Session) Stats 2015, ch. 547.

and clearly making the case for using multiple tools to meet California's GHG targets. The 2013 Scoping Plan Update (adopted in 2014) assessed progress toward achieving the 2020 target and made the case for addressing short-lived climate pollutants (SLCPs). The 2017 Scoping Plan Update shifted focus to the newer SB 32 goal of a 40 percent below 1990 levels by 2030 by laying out a detailed cost-effective and technologically feasible path to this target, and also assessed progress towards achieving the AB 32 goal of returning to 1990 GHG levels by 2020. The 2020 goal was ultimately reached in 2016, four years ahead of the schedule called for under AB 32.

The 2022 Scoping Plan is the most comprehensive and far-reaching Scoping Plan developed to date. It identifies a technologically feasible, cost-effective, and equity-focused path to achieve the aforementioned targets, while also assessing the progress California is making toward reducing its GHG emissions by at least 40 percent below 1990 levels by 2030, as called for in SB 32 and laid out in the 2017 Scoping Plan. The 2030 target is an interim but important stepping stone along the critical path to the broader goal of deep decarbonization by 2045. The relatively longer path assessed in the 2022 Scoping Plan incorporates, coordinates, and leverages many existing and ongoing efforts to reduce GHGs and air pollution, while identifying new clean technologies and energy. Given the focus on carbon neutrality, the 2022 Scoping Plan also includes discussion for the first time of the natural and working lands sectors as sources for both sequestration and carbon storage, and as sources of emissions as a result of wildfires.

Table VIII-1
Estimated Statewide GHG Emissions Reductions in the 2022 Scoping Plan

Emissions Scenario	GHG Emissions ($MMTCO_2e$)
2019	
2019 State GHG Emissions	404
2030	
2030 BAU Forecast	312
2030 GHG Emissions without Carbon Removal and Capture	233
2030 GHG Emissions with Carbon Removal and Capture	226
2030 Emissions Target Set by AB 32 (i.e., 1990 level by 2030)	260
Reduction below BAU necessary to achieve 1990 levels by 2030	52 (16.7%)[A]
2045	
2045 BAU Forecast	266
2045 GHG Emissions without Carbon Removal and Capture	72
2045 GHG Emissions with Carbon Removal and Capture	(3)

Notes:

$MMTCO_2e$ = million metric tons of carbon dioxide equivalents; parenthetical numbers represent negative values.

[A] 312 – 260 = 52. 52 / 312 = 16.7%

Source: CARB, Final 2022 Climate Change Scoping Plan, December 2022.

The 2022 Scoping Plan Update reflects existing and recent direction in the Governor's Executive Orders and State Statutes, which identify policies, strategies, and regulations in support of and implementation of the Scoping Plan. Among these include Executive Order B-55-18 and AB 1279 (The California Climate Crisis Act), which identify the 2045 carbon neutrality and GHG reduction targets required for the Scoping Plan.

Table VIII-2 provides a summary of major climate legislation and executive orders issued since the adoption of the 2017 Scoping Plan.

Table VIII-2
Major Climate Legislation and Executive Orders Enacted Since the 2017 Scoping Plan

Bill/Executive Order	Summary
Assembly Bill 1279 (AB 1279) (Muratsuchi, Chapter 337, Statutes of 2022) *The California Climate Crisis Act*	AB 1279 establishes the policy of the state to achieve carbon neutrality as soon as possible, but no later than 2045; to maintain net negative GHG emissions thereafter; and to ensure that by 2045 statewide anthropogenic GHG emissions are reduced at least 85 percent below 1990 levels. The bill requires CARB to ensure that the Scoping Plan updates identify and recommend measures to achieve carbon neutrality, and to identify and implement policies and strategies that enable CO_2 removal solutions and carbon capture, utilization, and storage (CCUS) technologies. This bill is reflected directly in the 2022 Scoping Plan Update.
Senate Bill 905 (SB 905) (Caballero, Chapter 359, Statutes of 2022) *Carbon Capture, Removal, Utilization, and Storage Program*	SB 905 requires CARB to create the Carbon Capture, Removal, Utilization, and Storage Program to evaluate, demonstrate, and regulate CCUS and carbon dioxide removal (CDR) projects and technology. The bill requires CARB, on or before January 1, 2025, to adopt regulations creating a unified state permitting application for approval of CCUS and CDR projects. The bill also requires the Secretary of the Natural Resources Agency to publish a framework for governing agreements for two or more tracts of land overlying the same geologic storage reservoir for the purposes of a carbon sequestration project. The 2022 Scoping Plan Update modeling reflects both CCUS and CDR contributions to achieve carbon neutrality.
Senate Bill 846 (SB 846) (Dodd, Chapter 239, Statutes of 2022) *Diablo Canyon Powerplant: Extension of Operations*	SB 846 extends the Diablo Canyon Power Plant's sunset date by up to five additional years for each of its two units and seeks to make the nuclear power plant eligible for federal loans. The bill requires that the California Public Utilities Commission (CPUC) not include and disallow a load-serving entity from including in their adopted resource plan, the energy, capacity, or any attribute from the Diablo Canyon power plant. The 2022 Scoping Plan Update explains the emissions impact of this legislation.
Senate Bill 1020 (SB 1020) (Laird, Chapter 361, Statutes of 2022)	SB 1020 adds interim renewable energy and zero carbon energy retail sales of electricity targets to California end-use customers set at 90 percent in 2035 and 95 percent in 2040. It accelerates

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Bill/Executive Order	Summary
Clean Energy, Jobs, and Affordability Act of 2022	the timeline required to have 100 percent renewable energy and zero carbon energy procured to serve state agencies from the original target year of 2045 to 2035. This bill requires each state agency to individually achieve the 100 percent goal by 2035 with specified requirements. This bill requires the CPUC, California Energy Commission (CEC), and CARB, on or before December 1, 2023, and annually thereafter, to issue a joint reliability progress report that reviews system and local reliability. The bill also modifies the requirement for CARB to hold a portion of its Scoping Plan workshops in regions of the state with the most significant exposure to air pollutants by further specifying that this includes communities with minority populations or low-income communities in areas designated as being in extreme federal non-attainment. The 2022 Scoping Plan Update describes the implications of this legislation on emissions.
Senate Bill 1137 (SB 1137) (Gonzales, Chapter 365, Statutes of 2022) *Oil & Gas Operations: Location Restrictions: Notice of Intention: Health protection zone: Sensitive receptors*	SB 1137 prohibits the development of new oil and gas wells or infrastructure in health protection zones, as defined, except for purposes of public health and safety or other limited exceptions. The bill requires operators of existing oil and gas wells or infrastructure within health protection zones to undertake specified monitoring, public notice, and nuisance requirements. The bill requires CARB to consult and concur with the California Geologic Energy Management Division (CalGEM) on leak detection and repair plans for these facilities, adopt regulations as necessary to implement emission detection system standards, and collaborate with CalGEM on public access to emissions detection data.
Senate Bill 1075 (SB 1075) (Skinner, Chapter 363, Statutes of 2022) *Hydrogen: Green Hydrogen: Emissions of Greenhouse Gases*	SB 1075 requires CARB, by June 1, 2024, to prepare an evaluation that includes: policy recommendations regarding the use of hydrogen, and specifically the use of green hydrogen, in California; a description of strategies supporting hydrogen infrastructure, including identifying policies that promote the reduction of GHGs and short-lived climate pollutants; a description of other forms of hydrogen to achieve emission reductions; an analysis of curtailed electricity; an estimate of GHG and emission reductions that could be achieved through deployment of green hydrogen through a variety of scenarios; an analysis of the potential for opportunities to integrate hydrogen production and applications with drinking water supply treatment needs; policy recommendations for regulatory and permitting processes associated with transmitting and distributing hydrogen from production sites to end uses; an analysis of the life-cycle GHG emissions from various forms of hydrogen production; and an analysis of air pollution and other environmental impacts from hydrogen distribution and end uses. This bill would inform the production of hydrogen at the scale called for in the 2022 Scoping Plan Update.

Table VIII-2
Major Climate Legislation and Executive Orders Enacted Since the 2017 Scoping Plan

Bill/Executive Order	Summary
Assembly Bill 1757 (AB 1757) (Garcia, Chapter 341, Statutes of 2022) *California Global Warming Solutions Act of 2006: Climate Goal: Natural and Working Lands*	AB 1757 requires the California Natural Resources Agency (CNRA), in collaboration with CARB, other state agencies, and an expert advisory committee, to determine a range of targets for natural carbon sequestration, and for nature-based climate solutions, that reduce GHG emissions in 2030, 2038, and 2045 by January 1, 2024. These targets must support state goals to achieve carbon neutrality and foster climate adaptation and resilience. This bill also requires CARB to develop standard methods for state agencies to consistently track GHG emissions and reductions, carbon sequestration, and additional benefits from natural and working lands over time. These methods will account for GHG emissions reductions of CO2, methane, and nitrous oxide related to natural and working lands and the potential impacts of climate change on the ability to reduce GHG emissions and sequester carbon from natural and working lands, where feasible. This 2022 Scoping Plan Update describes the next steps and implications of this legislation for the natural and working lands sector.
Senate Bill 1206 (SB 1206) (Skinner, Chapter 884, Statutes of 2022) *Hydrofluorocarbon gases: sale or distribution*	SB 1206 mandates a stepped sales prohibition on newly produced high- global warming potential (GWP) HFCs to transition California's economy toward recycled and reclaimed HFCs for servicing existing HFC-based equipment. Additionally, SB 1206 also requires CARB to develop regulations to increase the adoption of very low-, i.e., GWP < 10, and no-GWP technologies in sectors that currently rely on higher-GWP HFCs.
Senate Bill 27 (SB 27) (Skinner, Chapter 237, Statutes of 2021) *Carbon Sequestration: State Goals: Natural and Working Lands: Registry of Prcjects*	SB 27 requires CNRA, in coordination with other state agencies, to establish the Natural and Working Lands Climate Smart Strategy by July 1, 2023. This bill also requires CARB to establish specified CO2 removal targets for 2030 and beyond as part of its Scoping Plan. Under SB 27, CNRA is to establish and maintain a registry to identify projects in the state that drive climate action on natural and working lands and are seeking funding. CNRA also must track carbon removal and GHG emission reduction benefits derived from projects funded through the registry. This bill is reflected directly in the 2022 Scoping Plan Update as CO2 removal targets for 2030 and 2045 in support of carbon neutrality.
Senate Bill 596 (SB 596) (Becker, Chapter 246, Statutes of 2021) *Greenhouse Gases: Cement Sector: Net- zero Emissions Strategy*	SB 596 requires CARB, by July 1, 2023, to develop a comprehensive strategy for the state's cement sector to achieve net-zero-emissions of GHGs associated with cement used within the state as soon as possible, but no later than December 31, 2045. The bill establishes an interim target of 40 percent below

Table VIII-2
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Bill/Executive Order	Summary
	the 2019 average GHG intensity of cement by December 31, 2035. Under SB 596, CARB must: • Define a metric for GHG intensity and establish a baseline from which to measure GHG intensity reductions. • Evaluate the feasibility of the 2035 interim target (40 percent reduction in GHG intensity) by July 1, 2028. • Coordinate and consult with other state agencies. • Prioritize actions that leverage state and federal incentives. • Evaluate measures to support market demand and financial incentives to encourage the production and use of cement with low GHG intensity. The 2022 Scoping Plan Update modeling is designed to achieve these outcomes.
Executive Order N-82-20	Governor Newsom signed Executive Order N-82-20 in October 2020 to combat the climate and biodiversity crises by setting a statewide goal to conserve at least 30 percent of California's land and coastal waters by 2030. The Executive Order also instructed the CNRA, in consultation with other state agencies, to develop a Natural and Working Lands Climate Smart Strategy that serves as a framework to advance the state's carbon neutrality goal and build climate resilience. In addition to setting a statewide conservation goal, the Executive Order directed CARB to update the target for natural and working lands in support of carbon neutrality as part of this Scoping Plan, and to take into consideration the NWL Climate Smart Strategy. Executive Order N-82-20 also calls on the CNRA, in consultation with other state agencies, to establish the California Biodiversity Collaborative (Collaborative). The Collaborative shall be made up of governmental partners, California Native American tribes, experts, business and community leaders, and other stakeholders from across the state. State agencies will consult the Collaborative on efforts to: • Establish a baseline assessment of California's biodiversity that builds upon existing data and can be updated over time. • Analyze and project the impact of climate change and other stressors in California's biodiversity. • Inventory current biodiversity efforts across all sectors and highlight opportunities for additional action to preserve and enhance biodiversity. CNRA also is tasked with advancing efforts to conserve biodiversity through various actions, such as streamlining the state's process to approve and facilitate projects related to environmental restoration and land management. The California Department of Food and Agriculture (CDFA) is directed to advance efforts to conserve biodiversity through measures such as reinvigorating populations of pollinator

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Bill/Executive Order	Summary
	insects, which restore biodiversity and improve agricultural production. The Natural and Working Lands Climate Smart Strategy informs the 2022 Scoping Plan Update.
Executive Order N-79-20	Governor Newsom signed Executive Order N-79-20 in September 2020 to establish targets for the transportation sector to support the state in its goal to achieve carbon neutrality by 2045. The targets established in this Executive Order are: • 100 percent of in-state sales of new passenger cars and trucks will be zero-emission by 2035. • 100 percent of medium- and heavy-duty vehicles will be zero-emission by 2045 for all operations where feasible, and by 2035 for drayage trucks. • 100 percent of off-road vehicles and equipment will be zero-emission by 2035 where feasible. The Executive Order also tasked CARB to develop and propose regulations that require increasing volumes of zero- electric passenger vehicles, medium- and heavy-duty vehicles, drayage trucks, and off-road vehicles toward their corresponding targets of 100 percent zero-emission by 2035 or 2045, as listed above. The 2022 Scoping Plan Update modeling reflects achieving these targets.
Executive Order N-19-19	Governor Newsom signed Executive Order N-19-19 in September 2019 to direct state government to redouble its efforts to reduce GHG emissions and mitigate the impacts of climate change while building a sustainable, inclusive economy. This Executive Order instructs the Department of Finance to create a Climate Investment Framework that: • Includes a proactive strategy for the state's pension funds that reflects the increased risks to the economy and physical environment due to climate change. • Provides a timeline and criteria to shift investments to companies and industry sectors with greater growth potential based on their focus of reducing carbon emissions and adapting to the impacts of climate change. • Aligns with the fiduciary responsibilities of the California Public Employees' Retirement System, California State Teachers' Retirement System, and the University of California Retirement Program. Executive Order N-19-19 directs the State Transportation Agency to leverage more than $5 billion in annual state transportation spending to help reverse the trend of increased fuel consumption and reduce GHG emissions associated with the transportation sector. It also calls on the Department of General Services to leverage its management and ownership of

Table VIII-2
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Bill/Executive Order	Summary
	the state's 19 million square feet in managed buildings, 51,000 vehicles, and other physical assets and goods to minimize state government's carbon footprint. Finally, it tasks CARB with accelerating progress toward California's goal of five million ZEV sales by 2030 by: • Developing new criteria for clean vehicle incentive programs to encourage manufacturers to produce clean, affordable cars. • Proposing new strategies to increase demand in the primary and secondary markets for ZEVs. • Considering strengthening existing regulations or adopting new ones to achieve the necessary GHG reductions from within the transportation sector. The 2022 Scoping Plan Update modeling reflects efforts to accelerate ZEV deployment.
Senate Bill 576 (SB 576) (Umberg, Chapter 374, Statutes of 2019) *Coastal Resources: Climate Ready Program and Coastal Climate Change Adaptation, Infrastructure and Readiness Program*	Sea level rise, combined with storm-driven waves, poses a direct risk to the state's coastal resources, including public and private real property and infrastructure. Rising marine waters threaten sensitive coastal areas, habitats, the survival of threatened and endangered species, beaches, other recreation areas, and urban waterfronts. SB 576 mandates that the Ocean Protection Council develop and implement a coastal climate adaptation, infrastructure, and readiness program to improve the climate change resiliency of California's coastal communities, infrastructure, and habitat. This bill also instructs the State Coastal Conservancy to administer the Climate Ready Program, which addresses the impacts and potential impacts of climate change on resources within the conservancy's jurisdiction.
Assembly Bill 65 (AB 65) (Petrie-Norris, Chapter 347, Statutes of 2019) *Coastal Protection: Climate Adaption: Prcject Prioritization: Natural Infrastructure: Local General Plans*	This bill requires the State Coastal Conservancy, when it allocates any funding appropriated pursuant to the California Drought, Water, Parks, Climate, Coastal Protection, and Outdoor Access For All Act of 2018, to prioritize projects that use natural infrastructure in coastal communities to help adapt to climate change. The bill requires the conservancy to provide information to the Office of Planning and Research on any projects funded pursuant to the above provision to be considered for inclusion into the clearinghouse for climate adaptation information. The bill authorizes the conservancy to provide technical assistance to coastal communities to better assist them with their projects that use natural infrastructure.
Executive Order B-55-18	Governor Brown signed Executive Order B-55-18 in September 2018 to establish a statewide goal to achieve carbon neutrality as soon as possible, and no later than 2045, and to achieve and maintain net negative emissions thereafter. Policies and programs undertaken to achieve this goal shall:

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Bill/Executive Order	Summary
	• Seek to improve air quality and support the health and economic resiliency of urban and rural communities, particularly low-income and disadvantaged communities. • Be implemented in a manner that supports climate adaptation and biodiversity, including protection of the state's water supply, water quality, and native plants and animals. This Executive Order also calls for CARB to: • Develop a framework for implementation and accounting that tracks progress toward this goal. • Ensure future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal. The 2022 Scoping Plan Update is designed to achieve carbon neutrality no later than 2045 and the modeling includes technology and fuel transitions to achieve that outcome.
Senate Bill 100 (SB 100) (De León, Chapter 312, Statutes of 2018) *California Renewables Portfolio Standard Program: emissions of greenhouse gases*	Under SB 100, the CPUC, CEC, and CARB shall use programs under existing laws to achieve 100 percent clean electricity for retail sales. The statute requires these agencies to issue a joint policy report on SB 100 every four years. The first of these reports was issued in 2021. The 2022 Scoping Plan Update reflects the SB 100 Core Scenario resource mix with a few minor updates.
Assembly Bill 2127 (AB 2127) (Ting, Chapter 365, Statutes of 2018) *Electric Vehicle Charging Infrastructure: Assessment*	This bill requires the CEC, working with CARB and the CPUC, to prepare and biennially update a statewide assessment of the electric vehicle charging infrastructure needed to support the levels of electric vehicle adoption required for the state to meet its goals of putting at least 5 million zero-emission vehicles on California roads by 2030 and of reducing emissions of GHGs to 40 percent below 1990 levels by 2030. The bill requires the CEC to regularly seek data and input from stakeholders relating to electric vehicle charging infrastructure. This bill supports the deployment of ZEVs as modeled in the 2022 Scoping Plan Update.
Senate Bill 30 (SB 30) (Lara, Chapter 614, Statutes of 2018) *Insurance: Climate Change*	This bill requires the Insurance Commissioner to convene a working group to identify, assess, and recommend risk transfer market mechanisms that, among other things, promote investment in natural infrastructure to reduce the risks of climate change related to catastrophic events, create incentives for investment in natural infrastructure to reduce risks to communities, and provide mitigation incentives for private investment in natural lands to lessen exposure and reduce climate risks to public safety, property, utilities, and infrastructure. The bill requires the policies recommended to address specified questions.

Table VIII-2
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Bill/Executive Order	Summary
Assembly Bill 2061 (AB 2061) (Frazier, Chapter 580, Statutes of 2018) *Near-zero-emission and Zero-emission Vehicles*	Existing state and federal law set specified limits on the total gross weight imposed on the highway by a vehicle with any group of two or more consecutive axles. Under existing federal law, the maximum gross vehicle weight of that vehicle may not exceed 82,000 pounds. AB 2061 authorizes a near-zero-emission vehicle or a zero-emission vehicle to exceed the weight limits on the power unit by up to 2,000 pounds. This bill supports the deployment of cleaner trucks as modeled in the 2022 Scoping Plan Update.

The 2022 Scoping Plan scenario identifies the need to accelerate AB 32's 2030 target, from 40 percent to 48 percent below 1990 levels. Cap-and-Trade regulation continues to play a large factor in the reduction of near-term emissions for meeting the 2030 reduction target. Every sector of the economy will need to begin to transition in this decade to meet these GHG reduction goals and achieve carbon neutrality no later than 2045. The 2022 Scoping Plan approaches decarbonization from two perspectives, managing a phasedown of existing energy sources and technologies, as well as increasing, developing, and deploying alternative clean energy sources and technology. The Scoping Plan scenario is summarized in Table 2-1 (starting on page 72) of the 2022 Scoping Plan. It includes references to relevant statutes and Executive Orders, although it is not comprehensive of all existing new authorities for directing or supporting the actions described. Table 2-1 identifies actions related to a variety of sectors such as: smart growth and reductions in VMT; light-duty vehicles (LDV) and zero-emission vehicles (ZEV); truck ZEVs; reduce fossil energy, emissions, and GHGs for aviation, ocean-going vessels, port operations, freight and passenger rail, oil and gas extraction; and petroleum refining; improvements in electricity generation; electrical appliances in new and existing residential and commercial buildings; electrification and emission reductions across industries such as for food products, construction equipment, chemicals and allied products, pulp and paper, stone/clay/glass/cement, other industrial manufacturing, and agriculture; retiring of combined heat and power facilities; low carbon fuels for transportation, business, and industry; improvements in non-combustion methane emissions, and introduction of low GWP refrigerants.

Achieving the targets described in the 2022 Scoping Plan will require continued commitment to and successful implementation of existing policies and programs, and identification of new policy tools and technical solutions to go further, faster. California's Legislature and state agencies will continue to collaborate to achieve the state's climate, clean air, equity, and broader economic and environmental protection goals. It will be necessary to maintain and strengthen this collaborative effort, and to draw upon the assistance of the federal government, regional and local governments, tribes, communities, academic institutions, and the private sector to achieve the state's near-term and longer-term emission reduction goals and a more equitable future for all Californians. The Scoping Plan acknowledges that the path forward is not dependent on one

agency, one state, or even one country. However, the State can lead by engaging Californians and demonstrating how actions at the state, regional, and local levels of governments, as well as action at community and individual levels, can contribute to addressing the challenge.

Aligning local jurisdiction action with state-level priorities to tackle climate change and the outcomes called for in the 2022 Scoping Plan is identified as critical to achieving the statutory targets for 2030 and 2045. The 2022 Scoping Plan discusses the role of local governments in meeting the State's GHG reductions goals. Local governments have the primary authority to plan, zone, approve, and permit how and where land is developed to accommodate population growth, economic growth, and the changing needs of their jurisdictions. They also make critical decisions on how and when to deploy transportation infrastructure, and can choose to support transit, walking, bicycling, and neighborhoods that do not force people into cars. Local governments also have the option to adopt building ordinances that exceed statewide building code requirements and play a critical role in facilitating the rollout of ZEV infrastructure. As a result, local government decisions play a critical role in supporting state-level measures to contain the growth of GHG emissions associated with the transportation system and the built environment – the two largest GHG emissions sectors over which local governments have authority. The City has taken the initiative in combating climate change by developing programs and regulations such as:

- Green New Deal
- Green Building Code
- City of Los Angeles All-Electric Buildings
- General Plan Housing Element (Housing Needs Assessment)
- Mobility Plan 2035

These programs and regulations are discussed below under the section for local GHG regulatory framework.

Regional

2024-2050 Regional Transportation Plan/Sustainable Communities Strategy

In September 2008 Governor Schwarzenegger signed the Sustainable Communities and Climate Protection Act of 2008, also known as SB 375, to align regional planning for housing and transportation with the GHG emissions reduction goals outlined by AB 32. SB 375 requires each MPO to adopt an SCS encouraging compact development that reduces passenger VMT and trips, all for the purpose of meeting CARB-determined regional GHG emissions reduction targets.

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development, and the environment. As the federally designated MPO for the six-county Southern California region, SCAG is required by law to ensure that transportation activities conform to, and are supportive of, regional and state air quality plan goals to attain

NAAQS. SCAG is also a co-producer, with the SCAQMD, of the transportation strategy and transportation control measure sections of the Basin's AQMP.

CARB set GHG emissions reduction targets of 8 percent by 2020 and 19 percent by 2035 (compared with 2005 levels) for the SCAG region, effective as of October 1, 2018. Adopted on April 4, 2024, SCAG's long-range plan, the 2024-2050 RTP/SCS serves as the roadmap to fulfilling the region's compliance with these latest GHG reduction targets. To this end, the 2024-2050 RTP/SCS recognizes that transportation investments and future land use patterns are inextricably linked and acknowledges how this relationship can help the region make choices that sustain existing resources while expanding efficiency, mobility, and accessibility for people across the region.

The 2024-2050 RTP/SCS calls for $751.7 billion in investments, including $303.3 billion for transit projects and operations, $75.4 billion for state highway operations and maintenance, $62.6 billion for goods movement, and $38 billion for active transportation. These investments would aim to achieve several key objectives:

- A 11.6 percent reduction in overall vehicle miles traveled among passenger vehicles (from 2019).
- A 31.8 percent reduction in minutes of daily traffic delay per person (from 2019).
- Achievement of the region's targets for reducing greenhouse gases from autos and light-duty trucks by 19 percent per capita, from 2005 levels, by 2035.
- 465,000 new jobs supported by transportation investments or improved competitiveness each year.
- An overall return on investment of $2 for every $1 spent.

The 2024-2050 RTP/SCS land use pattern continues the trend of focusing new housing and employment growth in the region's Priority Development Areas (PDAs) and aims to enhance and build out the region's transit network. According to the 2024-2050 RTP/SCS, 66 percent of new households and 54 percent of new jobs between 2019–2050 will be located in PDAs, either near transit or in walkable communities.

The SB 375 GHG reduction targets for the SCAG region correspond with reductions in regional VMT per capita. OPR has recommended that achieving 15 percent lower per capita (residential) or per employee (commercial) VMT than existing development is generally feasible and is supported by evidence that connects these reductions to the state's emissions goals.

South Coast Air Quality Management District CEQA Guidance

The City of Los Angeles is located in the South Coast Air Basin (Basin). The South Coast Air Quality Management District (SCAQMD) is responsible for air quality planning in the Basin and

developing rules and regulations to bring the area into attainment of the ambient air quality standards. This is accomplished through air quality monitoring, evaluation, education, implementation of control measures to reduce emissions from stationary sources, permitting and inspection of pollution sources, enforcement of air quality regulations, and by supporting and implementing measures to reduce emissions from motor vehicles.

In 2008, SCAQMD released draft guidance regarding interim CEQA GHG significance thresholds.[43] A GHG Significance Threshold Working Group was formed to further evaluate potential GHG significance thresholds.[44] The SCAQMD proposed the use of a percent emission reduction target to determine significance for commercial/residential projects that emit greater than 3,000 $MTCO_2e$ per year. Under this proposal, commercial/residential projects that emit fewer than 3,000 $MTCO_2e$ per year would be assumed to have a less than significant impact on climate change. On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold of 10,000 $MTCO_2e$ per year for stationary source/industrial projects where the SCAQMD is the lead agency. However, the SCAQMD has yet to adopt a GHG significance threshold for land use development projects (e.g., residential/commercial projects). The Working Group has been inactive since 2011, and SCAQMD has not formally adopted any GHG significance thresholds for other jurisdictions.

Local

City of Los Angeles Green New Deal

In 2007, the City addressed the issue of global climate change by releasing *Green LA, An Action Plan to Lead the Nation in Fighting Global Warming* ("LA Green Plan/Climate LA"). This document outlined various goals and actions that the City established to reduce the generation and emissions of GHGs from both public and private activities.

In April 2019, the City released the *Green New Deal* (also referred to as the *Sustainable City Plan 2019*). This program contains actions designed to create sustainability-based performance targets through 2050 that are themselves intended to advance economic, environmental, and equity objectives. It is the first four-year update to the City's first "Sustainable City pLAn" that was released in 2015. It augments, expands, and elaborates the City's vision for a sustainable future and tackles climate change with accelerated targets and new aggressive goals.

Though the *Green New Deal* is not a plan adopted solely to reduce GHG emissions, it lists "Climate Mitigation" (i.e., GHG reduction) as one of eight explicit benefits that help define its strategies and goals. Goals that are directly or indirectly linked to climate mitigation include:

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[43] SCAQMD, Board Meeting, December 5, 2008. Agenda No. 31, http://www3.aqmd.gov/hb/2008/081231.a.thm. Accessed June 23, 2022.

[44] SCAQMD, *Greenhouse Gases CEQA Significance Thresholds*, http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds. Accessed June 23, 2022.

- Reduce potable water use per capita by 22.5 percent by 2025; 25 percent by 2035; and maintain or reduce 2035 per capita water use through 2050.

- Reduce building energy use per square feet for all building types by 22 percent by 2025; 34 percent by 2035; and 44 percent by 2050 (from a baseline of 68mBTU/sf in 2015).

- All new buildings will be net zero carbon by 2030 and 100 percent of buildings will be net zero carbon by 2050.

- Increase cumulative new housing unit construction to 150,000 by 2025; and 275,000 units by 2035.

- Ensure 57 percent of new housing units are built within 1,500 feet of transit by 2025; 75 percent by 2050.

- Increase the percentage of all trips made by walking, biking, micro-mobility/matched rides, or transit to at least 35 percent by 2025, 50 percent by 2035, and maintain at least 50 percent by 2050.

- Reduce VMT per capita by at least 13 percent by 2025; 39 percent by 2035; and 45 percent by 2050.

- Increase the percentage of electric and zero emission vehicles in the city to 25 percent by 2025; 80 percent by 2035; and 100 percent by 2050.

- Increase landfill diversion rate to 90 percent by 2025; 95 percent by 2035; and 100 percent by 2050.

- Reduce municipal solid waste generation per capita by at least 15 percent by 2030, including phasing out single-use plastics by 2028 (from a baseline of 17.85 pounds of waste generated per capita per day in 2011).

- Eliminate organic waste going to landfills by 2028.

- Reduce the urban/rural temperature differential by at least 1.7 degrees by 2025; and 3 degrees by 2035.

- Ensure the proportion of Angelenos living within ½ mile of a park or open space is at least 65 percent by 2025; 75 percent by 2035; and 100 percent by 2050.

City of Los Angeles Green Building Code

In December 2019, the Los Angeles City Council approved Ordinance No. 186,488, which amended Chapter IX of the Los Angeles Municipal Code (LAMC), referred to as the Los Angeles Green Building Code, by adding a new Article 9 to incorporate various provisions of the 2019

CALGreen Code. Projects filed on or after January 1, 2020, must comply with the provisions of the Los Angeles Green Building Code.

City of Los Angeles General Plan Housing Element (Housing Needs Assessment)

The Housing Element of the City's General Plan is prepared pursuant to state law and provides planning guidance in meeting housing needs identified in the SCAG Regional Housing Needs Assessment (RHNA). The Housing Element identifies the City's housing conditions and needs, establishes the goals, objectives, and policies that are the foundation of the City's housing and growth strategy, and provides an array of programs the City intends to implement to create and preserve sustainable, mixed-income neighborhoods across the City.

The Housing Needs Assessment chapter of the Housing Element discusses the City's population and housing stock to identify housing needs for a variety of household types across the City. The current RHNA goal for affordable housing within the City is approximately 40 percent of new construction. However, the City's projections show affordable housing comprising 20 percent of new construction, which falls short of the 40 percent RHNA goal. In order to address this shortfall in affordable housing, the Housing Element provides measures to streamline and incentivize development of affordable housing. Such measures include revising density bonuses for affordable housing; identifying locations which are ideal for funding programs to meet low-income housing goals; and rezoning areas to encourage low-income housing. With implementation of such measures to increase affordable housing, the Housing Element predicts a significant increase in housing production at all income ranges compared to previous cycles.

The Housing Element also promotes sustainability and resilience, and environmental justice through housing, as well as the need to reduce displacement. It encourages the utilization of alternatives to current parking standards that lower the cost of housing, support GHG and VMT goals and recognize the emergence of shared and alternative mobility. The Element also identifies housing strategies for energy conservation, water conservation, alternative energy sources and sustainable development which support conservation and reduce demand.

Mobility Plan 2035

In August 2015, the City Council adopted the Mobility Plan 2035, which serves as the City's General Plan circulation element. The City Council has adopted several amendments to the Mobility Plan since its initial adoption, including the most recent amendment in September 2016. The Mobility Plan incorporates "complete streets" principles and lays the foundation for how the City's residents interact with their streets. While the Mobility Plan 2035 mainly relates to transportation, certain components would serve to reduce VMT and mobile source GHG emissions. One component of the Mobility Plan is a GHG emission tracking program to establish compliance with SB 375, AB 32, and the region's Sustainable Community Strategy.

Existing Conditions

Existing Statewide GHG Emissions

CARB reports that in 2019, emissions from GHG emissions statewide were 404 $MMTCO_2e$, 27 $MMTCO_2e$ below the state's 2020 GHG limit of 431 $MMTCO_2e$. The transportation sector was the largest source of GHG emissions, accounting for approximately half of the state's GHG inventory when including upstream transportation emissions from the refinery and oil and gas industrial sectors. The commercial and residential sectors accounted for approximately 10 percent of GHG emissions. Agriculture accounted for approximately 8 percent, and electricity generation accounted for approximately 20 percent. Remaining emissions came from sectors such as non-transportation fuel-related industrial sources, recycling and waste management, and from high global warming potential gases.

In 2021, approximately 52 percent of electricity generation serving California came from renewable and zero-carbon resources (e.g., solar and wind).

Existing Project Site Emissions

The Project would be located on the currently undeveloped portion of the Project Site. Therefore, there are no GHG emissions generated from this portion of the Project Site (the remaining development on the Project Site would be retained as part of the Project).

Thresholds of Significance

Pursuant to the Appendix G thresholds, the Project would have a significant impact with respect to GHG emissions if it would:

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

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

CEQA Guidelines Section 15064.4 recommends that lead agencies make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project. Lead agencies have discretion to determine whether to quantify GHG emissions of projects and/or consider several other qualitative factors that may be used in the determination of significant of GHG emissions from a project: the extent to which the project may increase or reduce GHG emissions; whether the project exceeds an applicable significant threshold; and the extent to which the project complies with regulations or requirements adopted to implement a reduction or mitigation of GHGs.

Section 15064.4 does not establish a threshold of significance. Lead agencies have the discretion to establish significance thresholds for their respective jurisdictions, and in establishing those

thresholds, a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as the California Air Pollution Control Officers Association (CAPCOA), as long as any threshold chosen is supported by substantial evidence (see CEQA Guidelines Section 15064.7(c)). The CEQA Guidelines also clarify that the effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis (see CEQA Guidelines Section 15130(f)).[45] It is noted that the CEQA Guidelines were amended in response to SB 97. In particular, the CEQA Guidelines were amended to specify that compliance with a GHG emissions reduction plan renders a cumulative impact less than significant.

Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that would avoid or substantially lessen the cumulative problem within the geographic area of the project. To qualify, such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. Examples of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plans [and] plans or regulations for the reduction of GHG emissions." Put another way, CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding of less than significant for cumulative GHG emissions if a project complies with adopted programs, plans, policies, and/or other regulatory strategies to reduce GHG emissions.[46]

In the absence of any applicable adopted numeric threshold, the significance of the Project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b) by considering whether the Project is consistent with applicable regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. For this Project, as a land use development project, the most directly applicable adopted regulatory plan to reduce GHG emissions is the 2024-2050 RTP/SCS, which is designed to achieve regional GHG reductions from the land use and transportation sectors as required by SB 375 and the State's long-term climate goals. This analysis also considers qualitative consistency with regulations or requirements adopted by the 2022 Scoping Plan Update, as well as the City's Green New Deal.

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[45] See also Letter from Cynthia Bryant, Director of the Office of Planning and Research to Mike Chrisman, Secretary for Natural Resources, dated April 13, 2009.

[46] See for example: San Joaquin Valley Air Pollution Control District, CEQA Determinations of Significance for Projects Subject to ARB's GHG Cap-and-Trade Regulation, APR – 2030 (June 25, 2014), in which the SJVAPCD "determined that GHG emissions increases that are covered under ARB's Cap-and-Trade regulation cannot constitute significant increases under CEQA…" Further, the SCAQMD has taken this position in CEQA documents it has produced as a lead agency. The SCAQMD has prepared three Negative Declarations and one Draft Environmental Impact Report that demonstrate the SCAQMD has applied its 10,000 $MTCO_2e$ per year significance threshold in such a way that GHG emissions covered by the Cap-and-Trade Program do not constitute emissions that must be measured against the threshold.

Methodology

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

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

For informational purposes only, the analysis also estimates the amount of GHG emissions that would be attributable to the Project using recommended air quality models, as described below, and is not used for a comparative analysis or threshold of significance. The primary purpose of quantifying the Project's GHG emissions is to satisfy the State CEQA Guidelines Section 15064.4(a), which calls for a good-faith effort to describe and calculate emissions. However, the significance of the Project's GHG emissions impacts is not based on the amount of GHG emissions resulting from the Project.

Consistency with Plans

The Project's GHG impacts are evaluated by assessing the Project's consistency with applicable statewide, regional, and local GHG reduction strategies. As discussed previously, the Project will be evaluated for consistency with the 2024-2050 RTP/SCS, the 2022 Scoping Plan Update, and the Green New Deal.

OPR encourages lead agencies to make use of programmatic mitigation plans and programs from which to tier when they perform individual project analyses. On a statewide level, the 2022 Scoping Plan Update provides measures to achieve the State's GHG reduction targets. On a regional level, SCAG's 2024-2050 RTP/SCS contains measures to achieve VMT reductions (and corresponding GHG reductions) required under SB 375. The City does not have a programmatic mitigation plan to tier from, such as a GHG Emissions Reduction Plan as recommended in the

relevant amendments to the CEQA Guidelines. However, the City has the Green New Deal and Green Building Code that encourage and require applicable projects to implement energy efficiency measures. The Green New Deal is a mayoral initiative and not an adopted plan. However, it includes short-term and long-term aspirations pertaining to climate change. This analysis addresses consistency with the Green New Deal's strategies and goals. Thus, if the Project is designed in accordance with the 2024-2050 RTP/SCS, the 2022 Scoping Plan Update, and the Green New Deal, the Project would result in a less than significant impact, because it would be consistent with the overarching State regulations on GHG reduction (i.e., SB 375 for the 2024-2050 RTP/SCS and AB 1279 for the 2022 Scoping Plan Update). A consistency analysis is provided and describes the Project's compliance or conflict with performance-based standards included in the applicable portions of the 2024-2050 RTP/SCS, the 2022 Scoping Plan Update, and the Green New Deal.

2022 Scoping Plan Update

Appendix D, Local Actions, of the 2022 Scoping Plan Update includes "recommendations intended to building momentum for local government actions that align with the State's climate goals, with a focus on local GHG reduction strategies (commonly referred to as climate action planning) and approval of new land use development projects, including through environmental review under CEQA."

The State encourages local governments to adopt a CEQA-qualified CAP addressing the three priority areas (transportation electrification, VMT reduction, and building decarbonization). However, the State recognizes that almost 50 percent of jurisdictions do not have an adopted CAP, among other reasons because they are costly, requiring technical expertise, staffing, and funding. Additionally, CAPs need to be monitored and updated as State targets change and new data becomes available. Jurisdictions that wish to take meaningful climate action (such as preparing a non-CEQA qualified CAP or as individual measures) aligned with the State's climate goals in the absence of a CEQA-qualified CAP are advised to look to the three priority areas when developing local climate plans, measures, policies, and actions. According to Appendix D, "By prioritizing climate action in these three priority areas, local governments can address the largest sources of GHGs within their jurisdiction."

The State also recognizes in Appendix D, Local Actions, of the 2022 Scoping Plan that each community or local area has distinctive situations and local jurisdictions must balance the urgent need for housing while demonstrating that a project is in alignment with the State's climate goals. The State calls for the climate crisis and the housing crisis to be confronted simultaneously. Jurisdictions should avoid creating targets that are impossible to meet as a basis to determine significance. Ultimately, targets that make it more difficult to achieve statewide goals by prohibiting or complicating projects that are needed to support the State's climate goals, like infill development, low-income housing or solar arrays, are not consistent with the State's goals. The State also recognizes the lead agencies' discretion to develop evidence-based approaches for determining whether a project would have a potentially significant impact on GHG emissions.

Quantification of Project GHG Emissions

The California Emissions Estimator Model (CalEEMod) is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use projects. CalEEMod was developed in collaboration with the air districts of California, which provided data (e.g., emissions factors, trip lengths, meteorology, source inventory, etc.) to account for local requirements and conditions. The model is considered by the SCAQMD to be an accurate and comprehensive tool for quantifying air quality and GHG impacts from land use projects throughout California.

A fundamental difficulty in the analysis of GHG emissions is the global nature of existing and cumulative future conditions. Changes in GHG emissions can be difficult to attribute to a particular planning program or project because the planning effort or project may cause a shift in the locale for some type of GHG emissions, rather than causing "new" GHG emissions. As a result, there is frequently an inability to conclude whether a project's GHG emissions represent a net global increase, reduction, or no change in GHGs that would existing if the project were not implemented. For example, if a multi-family residential project replaces an existing supermarket, GHG emissions associated with the existing supermarket would not be totally eliminated because former patrons of the supermarket would still drive and get groceries somewhere else, which would continue to generate associated GHG emissions. GHG emissions associated with the new multi-family residential project would not be totally new, because many residents will have presumably moved there from other housing. Their GHG emissions would be shifted to their new housing, but if the new multi-family residential project has access to high quality transit and walkable destinations, then there is a strong likelihood that the residents' GHG per capita would be reduced on average by their move to the new project. Notwithstanding these complexities, the analysis of the Project's GHG emissions is conservative because it assumes all the Project's direct and indirect GHG emissions would be new additions to the atmosphere.

Construction

The Project's construction emissions were calculated using CalEEMod Version 2022.1.1.24. Details of the modeling assumptions and emission factors are provided in Appendix E of this IS/MND. CalEEMod calculates emissions from off-road equipment usage and on-road vehicle travel associated with haul, delivery, and construction worker trips. GHG emissions during construction were forecasted based on the proposed construction schedule and included the mobile- source and fugitive dust emissions factors derived from CalEEMod.

The calculations of the emissions generated during Project construction activities reflect the types and quantities of construction equipment that would be used to remove existing pavement, grade, and excavate the Project Site; construct the proposed building and related improvements; and plant new landscaping within the Project Site.

In accordance with SCAQMD's guidance, GHG emissions from construction were amortized (i.e., averaged annually) over the lifetime of the Project. Because emissions from construction activities occur over a relatively short-term period, they contribute a relatively small portion of the overall lifetime GHG emissions for the Project. In addition, GHG emissions reduction measures for construction equipment are relatively limited. Thus, SCAQMD recommends that construction emissions be amortized over a 30-year project lifetime, so that GHG emissions reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies.[47] As a result, the Project's total construction GHG emissions were divided by 30 to determine an approximate annual construction emissions estimate comparable to operational emissions.

Operation

Similar to construction, CalEEMod is used to calculate potential GHG emissions generated by new land uses on the Project Site, including area sources, electricity, natural gas, mobile sources, stationary sources (i.e., emergency generators), solid waste generation and disposal, and water usage/wastewater generation.

Area source emissions include landscaping equipment that are based on the size of the land uses (e.g., square footage or dwelling unit), the GHG emission factors for fuel combustion, and the global warming potential (GWP) values for the GHG emissions emitted.

GHG emissions associated with electricity demand are based on the size of the land uses, the electrical demand factors for the land uses, the GHG emission factors for the electricity utility provider, and the GWP values for the GHG emissions emitted. As with electricity, the emissions of GHG emissions associated with natural gas combustion are based on the size of the land uses, the natural gas combustion factors for the land uses in units of million British thermal units (MMBtu), the GHG emission factors for natural gas combustion, and the GWP values for the GHG emissions emitted.

Mobile source GHG emissions are calculated based on an estimate of the Project's annual VMT, which is derived using CalEEMod based on the trip generation provided in the Transportation Study prepared for the Project. The CalEEMod-derived VMT values account for the daily and seasonal variations in trip frequency and length associated with new employee and visitor trips to and from the Project Site and other activities that generate a vehicle trip.

Stationary source GHG emissions are based on proposed stationary sources (i.e., emergency generators) that would be provided on the Project Site.

GHG emissions associated with solid waste disposal are based on the size of the Project's proposed land uses, the waste disposal rate for the land uses, the waste diversion rate, the GHG

[47] SCAQMD Governing Board Agenda Item 31, December 5, 2008.

emission factors for solid waste decomposition, and the GWP values for the GHG emissions emitted.

GHG emissions related to water usage and wastewater generation are based on the size of the land uses, the water demand factors, the electrical intensity factors for water supply, treatment, and distribution, electrical intensity factors for wastewater treatment, the GHG emission factors for the electricity utility provider, and the GWP values for the GHG emissions emitted.

The analysis of Project GHG emissions at buildout uses assumptions in CARB's EMFAC2021 model (1.0.1) and considers actions and mandates expected to be in force in 2028 (e.g., Pavley I Standards, full implementation of California's 33 percent RPS by 2030 and 50 percent by 2050 and the California LCFS). In addition, because mobile source GHG emissions are directly dependent on the number of vehicle trips, a decrease in the number of project-generated trips because of project features (e.g., proximity to transit) would provide a proportional reduction in mobile source GHG emissions compared to a generic project without such locational benefits. Calculation of Project GHG emissions conservatively did not include actions and mandates that are not already in place but are expected to be enforced in 2028 (e.g., Pavley II, which could further reduce GHG emissions from use of light-duty vehicles by 2.5 percent). Similarly, emissions reductions regarding Cap-and-Trade were not included in this analysis as they applied to other future reductions in non-transportation sectors. As for the Cap-and-Trade program's benefits for the transportation sector, the analysis utilizes CARB's assumptions in EMFAC2021 for any short-term reductions in GHG emissions. By not speculating on potential regulatory conditions, the analysis takes a conservative approach that likely overestimates the Project's GHG emissions at buildout, because the state is expected to implement several policies and programs aimed at reducing GHG emissions from the land use and transportation sectors to meet the state's long-term climate goals.

Analysis

The Appendix G thresholds questions concerning GHG emissions are addressed together in the following analysis:

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

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

Plan Consistency

Less Than Significant Impact. The following section describes the extent the Project complies with or exceeds the performance-based standards included in the 2024-2050 RTP/SCS, the 2022 Scoping Plan Update, and the Green New Deal. As demonstrated below, the Project would be

consistent with these applicable GHG reduction plans and policies, and its GHG impact would therefore be less than significant.

2024-2050 RTP/SCS

Table VIII-3 provides a comparison of the Project against the GHG-related performance measures of the 2024-2050 RTP/SCS.

Table VIII-3
Consistency with the 2024-2050 RTP/SCS

Performance Measure	Consistency Analysis
Decrease average distance traveled for work trips from 16.2 to 15.9 miles by 2050.	**No Conflict.** The Project is an infill development that would create more service-related jobs near residential uses, consistent with the 2024-2050 RTP/SCS policies and would focus on job growth on the Jefferson Boulevard corridor and within an HQTC. It would increase the density of development on the Project Site that would potentially increase on-site employment and decrease the need for longer commutes.
Decrease average distance traveled for non-work trips to 6.1 miles by 2050.	**No Conflict.** The Project is an infill development that would focus on growth on the Jefferson Boulevard corridor and within an HQTC. It would increase the density of development on the Project Site that would potentially reduce the need for longer travel to mini-warehouse options.
Increase share of all trips ten miles or less from 46.9 to 47.6 percent by 2050.	**No Conflict.** The Project is an infill development that would focus on growth on the Jefferson Boulevard corridor and within an HQTC. It would increase the density of development on the Project Site that would potentially reduce the need for longer travel to mini-warehouse options.
Increase share of all trips 25 miles or less from 80.1 to 80.7 percent by 2050.	**No Conflict.** The Project is an infill development that would focus on growth on the Jefferson Boulevard corridor and within an HQTC. It would increase the density of development on the Project Site that would potentially reduce the need for longer travel to mini-warehouse options.
Increase share of work trips by SOV from 65.9 to 61.9 percent by 2050.	**No Conflict.** The Project is an infill development in the dense Jefferson Boulevard corridor that will reduce the rate of growth in SOV use and congestion by virtue of the transit accessibility along this corridor.
Increase share of all trips by SOV from 37.0 to 34.7 percent by 2050.	**No Conflict.** The Project is an infill development in the dense Jefferson Boulevard corridor that will reduce the rate of growth in SOV use and congestion by virtue of the transit accessibility along this corridor.
Decrease share of work trips by SOV from 23.9 to 21.7 percent by 2050.	**No Conflict.** The Project is an infill development in the dense Jefferson Boulevard corridor that will reduce the rate of growth in SOV use by centralizing more jobs on the Project Site.

Performance Measure	Consistency Analysis
Decrease share of all trips by SOV from 48.7 to 46.3 percent by 2050.	**No Conflict.** The Project is an infill development in the dense Jefferson Boulevard corridor that will reduce the rate of growth in SOV use.
Increase share of work trips by transit from 4.6 to 7.9 percent by 2050.	**No Conflict.** The Project would increase the density of development and jobs on the Project Site, which is served by Metro Line 110, LADOT Commuter Express Line 437B, Culver City Bus Line 4, and Playa Vista Daily Shuttle. These stops are located within walking distance of the Project Site and could increase transit usage over existing conditions.
Increase share of all trips by transit from 3.9 to 5.3 percent by 2050.	**No Conflict.** The Project would increase the density of development on the Project Site, which is served by Metro Line 110, LADOT Commuter Express Line 437B, Culver City Bus Line 4, and Playa Vista Daily Shuttle. These stops are located within walking distance of the Project Site and could increase transit usage over existing conditions.
Increase share of work trips by walking from 3.6 to 4.3 percent by 2050.	**No Conflict.** The Project would increase the density of development and jobs on the Project Site, in close proximity to existing residential uses, in an area that is served by a developed sidewalk network. As such, the Project could increase the share of walking commute trips over existing conditions.
Increase share of all trips by walking from 8.8 to 10.2 percent by 2050.	**No Conflict.** The Project would increase the density of development on the Project Site, which is served by a developed sidewalk network. As such, the Project could increase the share of walking trips over existing conditions, particularly to the retail uses on-site.
Increase share of work trips by bicycle from 1.9 to 4.1 percent by 2050.	**No Conflict.** The Project would increase the density of development and jobs on the Project Site, which is located in an area with flat streets. In addition, the Project would include a total of 64 bicycle parking spaces. As such, the Project could increase the share of bicycling commute trips over existing conditions.
Increase share of all trips by bicycle from 1.6 to 3.5 percent.	**No Conflict.** The Project would increase the density of development on the Project Site, which is located in an area with flat streets. In addition, the Project would include a total of 64 bicycle parking spaces. As such, the Project could increase the share of bicycling trips over existing conditions, particularly to the retail uses on-site.
Reduce person hours of delay on highways from 1,266,283 to 1,024,863 by 2050.	**No Conflict.** The Project's focus on mini-warehouse and ground-floor retail is a largely local-serving use that would generally not involve long-distance, highway-based trips. As such, the Project would not promote highway-based driving that would contribute to congestion and delay.
Reduce person hours of delay on HOV lanes from 84,351 to 12,345 by 2050.	**No Conflict.** The Project's focus on mini-warehouse and ground-floor retail is a largely local-serving use that would

Performance Measure	Consistency Analysis
	generally not involve long-distance, highway-based trips. As such, the Project would not promote highway-based use of HOV lanes that would contribute to congestion and delay.
Reduce person hours of delay on arterials from 1,245,043 to 927,265 by 2050.	**No Conflict.** The Project is an infill development that would create more service-related jobs, consistent with the 2024-2050 RTP/SCS policies and would focus on job growth on the Jefferson Boulevard corridor and within an HQTC. It would increase the density of development on the Project Site that would potentially increase on-site employment and reduce the need for longer commutes, including the need for longer travel to self-storage options.
Reduce person hours of delay on all facilities from 2,868,470 to 2,184,952 by 2050.	**No Conflict.** The Project is an infill development that would create more service-related jobs, consistent with the 2024-2050 RTP/SCS policies and would focus on job growth on the Jefferson Boulevard corridor and within an HQTC. It would increase the density of development on the Project Site that would potentially increase on-site employment and reduce the need for longer commutes, including the need for longer travel to self-storage options.
Reduce daily minutes of delay per capita from 8.2 to 6.3 by 2050.	**No Conflict.** The Project is an infill development that would create more service-related jobs, consistent with the 2024-2050 RTP/SCS policies and would focus on job growth on the Jefferson Boulevard corridor and within an HQTC. It would increase the density of development on the Project Site that would potentially increase on-site employment and reduce the need for longer commutes, including the need for longer travel to self-storage options.
Reduce truck delay on highways from 140,249 to 119,137 hours by 2050.	**No Conflict.** The Project's focus on mini-warehouse and ground-floor retail is a largely local-serving use that would generally not involve long-distance, highway-based trips or use of heavy-duty trucks. As such, the Project would not promote highway-based use of heavy-dusty trucks that would contribute to congestion and delay.
Reduce truck delay on arterials from 28,457 to 22,621 hours by 2050.	**No Conflict.** The Project's focus on mini-warehouse and ground-floor retail is a largely local-serving use that would generally not involve use of heavy-duty trucks. As such, the Project would not contribute to congestion and delay from trucks.
Reduce truck delay on all facilities from 173,039 to 144,812 hours by 2050.	**No Conflict.** The Project's focus on mini-warehouse and ground-floor retail is a largely local-serving use that would generally not involve use of heavy-duty trucks. As such, the Project would not contribute to congestion and delay from trucks.
Reduce average travel time to work from 27.8 to 27.1 hours by 2050.	**No Conflict.** The Project is an infill development that would create more service-related jobs, consistent with the 2024-2050

Performance Measure	Consistency Analysis
	RTP/SCS policies and would focus on job growth on the Jefferson Boulevard corridor and within an HQTC. It would increase the density of development on the Project Site that would potentially increase on-site employment and reduce the need for longer commutes.
Increase annual number of transit boardings per capita from 47.2 to 77.5 by 2050.	**No Conflict.** The Project would increase the density of development and jobs on the Project Site, which is served by Metro Line 110, LADOT Commuter Express Line 437B, Culver City Bus Line 4, and Playa Vista Daily Shuttle. These stops are located within walking distance of the Project Site and could increase transit boardings over existing conditions.
Increase share of jobs accessible within 30 minutes by auto from 12.2 to 13.4 percent by 2050.	**No Conflict.** The Project is an infill development that would create more service-related jobs, consistent with the 2024-2050 RTP/SCS policies and would focus on job growth on the Jefferson Boulevard corridor and within an HQTC. It would increase the density of development on the Project Site that would potentially increase on-site employment and the share of work trips less than 30 minutes, particularly based on the proximity of existing residential uses to the Project Site.
Increase share of jobs accessible within 45 minutes by transit from 1.8 to 2.6 percent by 2050.	**No Conflict.** The Project is an infill development that would create more service-related jobs, consistent with the 2024-2050 RTP/SCS policies and would focus on job growth on the Jefferson Boulevard corridor and within an HQTC. It would increase the density of development on the Project Site that would potentially increase on-site employment and the share of work trips by public transit.
Increase share of shopping destinations accessible within 15 minutes by auto from 4.2 to 4.6 percent by 2050.	**No Conflict.** The Project includes ground-floor retail accessible by auto. In addition, the Project would not inhibit the region's efforts to add to the supply of shopping options in metropolitan Los Angeles County.
Increase share of shopping destinations accessible within 30 minutes by transit from 0.4 to 0.6 percent by 2050.	**No Conflict.** The Project includes ground-floor retail that would be accessible by transit. In addition, the Project would not inhibit the region's efforts to add to the supply of shopping options in metropolitan Los Angeles County near public transit.
Increase share of educational destinations accessible within 30 minutes by auto from 12.1 to 13.4 percent by 2050.	**No Conflict.** The Project does not include educational destinations. Nevertheless, it would not inhibit the region's efforts to add to the supply of educational options in metropolitan Los Angeles County.
Increase share of educational destinations accessible within 30 minutes by transit from 0.2 to 0.4 percent by 2050.	**No Conflict.** The Project does not include educational destinations. Nevertheless, it would not inhibit the region's efforts to add to the supply of educational options in metropolitan Los Angeles County near public transit.
Increase share of healthcare destinations accessible within 30 minutes by auto from 16.7 to 18.4 percent by 2050.	**No Conflict.** The Project does not include healthcare destinations. Nevertheless, it would not inhibit the region's

Performance Measure	Consistency Analysis
	efforts to add to the supply of healthcare options in metropolitan Los Angeles County.
Increase share of healthcare destinations accessible within 30 minutes by transit from 0.3 to 0.5 percent by 2050.	**No Conflict.** The Project does not include healthcare destinations. Nevertheless, it would not inhibit the region's efforts to add to the supply of healthcare options in metropolitan Los Angeles County near public transit.
Increase share of work trips less than three miles from 16.5 to 16.7 percent by 2050.	**No Conflict.** The Project is an infill development in the dense Jefferson Boulevard corridor that will increase the density of development on the Project Site that would potentially increase on-site employment and the share of work trips less than three miles, particularly based on the proximity of existing residential uses to the Project Site.
Increase share of non-work trips less than three miles to 41.8 percent	**No Conflict.** The Project is an infill development in the dense Jefferson Boulevard corridor that will increase the density of development on the Project Site that would potentially increase the share of storage and retail trips less than three miles.
Increase share of regional housing units within designated Priority Development Areas (PDAs) from 57.0 to 61.1 percent by 2050.	**No Conflict.** The Project does not include residential uses. Nevertheless, it would not inhibit the region's efforts to add to housing units in PDAs.
Increase share of population able to reach a park within 30 minutes by auto to 99.6 percent by 2050.	**No Conflict.** The Project does not include residential uses or parks. Nevertheless, it would not inhibit the region's efforts to add to housing units or parklands.
Increase share of population able to reach a park within 30 minutes by transit from 57.6 to 62.1 percent by 2050.	**No Conflict.** The Project does not include residential uses or parks. Nevertheless, it would not inhibit the region's efforts to add to housing units or parklands.
Decrease daily VMT per capita from 20.7 to 19.4 by 2050.	**No Conflict.** The Project is an infill development in the dense Jefferson Boulevard corridor that will reduce the rate of growth in auto traffic and congestion by virtue of its transit accessibility. As such, it would help decrease VMT per capita. In addition, as discussed below under "Transportation," the Project's impacts related to VMT would be less than significant.
Decrease total square miles of greenfield and rural lands converted to urban use from 79.3 to 41.8 by 2050.	**No Conflict.** The Project is an infill development in the dense Jefferson Boulevard corridor that will reduce the rate of urban sprawl and the conversion of greenfield and rural lands. As such, it is consistent with AB 32, SB 32, SB 375, and other initiatives designed to reduce GHG emissions.
Decrease energy consumption per household from 45.8 to 44.6 million BTUs by 2050.	**No Conflict.** The Project does not include residential uses. Nevertheless, it would not inhibit the region's efforts to add to improve energy efficiency in residences.
Decreases urban water consumption per household from 75,100 to 74,600 gallons by 2050.	**No Conflict.** The Project does not include residential uses. Nevertheless, it would not inhibit the region's efforts to add to promote water conservation in households.

2022 Scoping Plan Update

As discussed, jurisdictions that want to take meaningful climate action should look to the following three priority areas: transportation electrification, VMT reduction, and building decarbonization. An assessment of the goals, plans, and policies implemented by the City which would support GHG reduction strategies in the three priority areas is provided below.

Transportation Electrification

The priority GHG reduction strategies for local government climate action related to transportation electrification are discussed below and would support the Scoping Plan action to have 100 percent of all new passenger vehicles be zero-emission by 2035.

- **Convert local government fleets to zero-emission vehicles (ZEV)**

CARB approved the Advanced Clean Cars II rule which codifies Executive Order N-79-20 and requires 100 percent of new cars and light trucks sold in California to be zero-emission vehicles by 2035. The State has also adopted AB 2127, which requires the CEC to analyze and examine charging needs to support California's EVs in 2030. This report would help decision-makers allocate resources to install new EV chargers where they are needed most.

The City of LA Green New Deal (Sustainable City pLAn 2019) identifies a number of measures to reduce VMT and associated GHG emissions. Such measures that would support the local reduction strategy include converting all city fleet vehicles to zero emission where technically feasible by 2028. Starting in 2021, all vehicle procurement followed a "zero emission first" policy for City fleets. The Green New Deal also establishes a target to increase the percentage of zero emission vehicles to 25 percent by 2025, 80 percent by 2035, and 100 percent by 2050. In order to achieve this goal, the City would build 20 Fast Charging Plazas throughout the City. The City would also install 28,000 publicly available chargers by 2028 to encourage adoption of ZEVs.

The City's goals of converting the municipal fleet to zero emissions and installation of EV chargers throughout the City would be consistent with the Scoping Plan goals of transitioning to EVs. Although this measure mainly applies to City fleets, the Project would not conflict with these goals. The Project would provide electric vehicle charging stations as well as conduits and infrastructure for future charging stations in conformance with LAMC requirements.

- **Create a jurisdiction-specific ZEV ecosystem to support deployment of ZEVs statewide (such as building standards that exceed state building codes, permit streamlining, infrastructure siting, consumer education, preferential parking policies, and ZEV readiness plans.**

The State has adopted AB 1236 and AB 970, which require cities to adopt streamlined permitting procedures for EV charging stations. As a result, the City updated Section IX of the LAMC, which requires most new construction to designate 30 percent of new parking spaces as capable of

supporting future electric vehicle supply equipment (EVSE). This would exceed the CALGreen 2022 requirements of 20 percent of new parking spaces as EV capable. The ordinance also requires new construction to install EVSE at 20 percent of total parking spaces. This requirement also exceeds the CALGreen 2022 requirements of installing EVSE for 25 percent of EV capable parking spaces which is approximately five percent of total parking spaces. The City has also implemented programs to increase the amount of EV charging on city streets, EV carshare, and incentive programs for apartments to be retrofitted with EV chargers.

The City's goals of installing EV chargers throughout the City would be consistent with the Scoping Plan goals of transitioning to EVs. While this measure mainly applies to City fleets, the Project would not interfere with this goal. The Project would provide electric vehicle charging stations as well as conduits and infrastructure for future charging stations in conformance with LAMC requirements.

VMT Reduction

The priority GHG reduction strategies for local government climate action related to VMT reduction are discussed below and would support the Scoping Plan action to reduce VMT per capita 25 percent below 2019 levels by 2030 and 30 percent below 2019 levels by 2045.

- **Reduce or eliminate minimum parking standards in new developments.**
- **Implement parking pricing or transportation demand management pricing strategies.**

The City of Los Angeles Mobility Plan 2035, which is the Transportation Element of the City's General Plan, contains measures and programs related to VMT reduction throughout the City. With regard to parking standards, the implementation of Mobility Plan Programs and AB 2097 reduce or eliminate parking requirements for certain types of development near transit (within half a mile). These reduction strategies and TDM programs would serve to reduce minimum parking standards and reduce vehicle trips.

The Project would comply with the City's requirement for retail and warehouse uses, though that includes a parking reduction of twenty percent to accompany the proposed Conditional Use Permit. While the Project would not reduce or eliminate parking supply from LAMC requirements, it would not conflict with this Citywide strategy to reduce parking standards for non-residential uses.

- **Implement Complete Streets policies and investments, consistent with general plan circulation element requirements.**

The City of Los Angeles Mobility Plan 2035 established a "Complete Streets" planning framework which resulted in the City of Los Angeles Complete Streets Design Guide in 2015, consistent with the State's Complete Streets Act of 2008. A supplemental update to the Complete Streets Design Guide was adopted in 2020.

The Complete Streets Design Guide provides a number of measures to increase public access to electric shuttles, car sharing, and other active transportation modes. The Design Guide establishes guidelines for establishing on-street parking for car sharing. The City has also established BlueLA, which is a car sharing network consisting of more than 100 electric vehicles located throughout the City. In addition, under the Green New Deal, the City would install 28,000 publicly available chargers by 2028 and introduce 135 new electric DASH buses.

This reduction strategy mainly applies to City traffic circulation, but the Project would be in support of this strategy. As explained earlier, the Project would be located within a HQTC, and development within these areas is part of the regional strategy to promote transit ridership and active transportation modes, which are themselves central components of Complete Streets policies.

- **Increase access to public transit by increasing density of development near transit, improving transit service by increasing service frequency, creating bus priority lanes, reducing or eliminating fares, microtransit, etc.**
- **Increase public access to clean mobility options by planning for and investing in electric shuttles, bike share, car share, and walking.**
- **Amend zoning or development codes to enable mixed-use, walkable, transit-oriented, and compact infill development (such as increasing the allowable density of a neighborhood).**
- **Preserve natural and working lands by implementing land use policies that guide development toward infill areas and do not convert "greenfield" land to urban uses (e.g., green belts, strategic conservation easements).**

These reduction strategies are supported through implementation of SB 375, which requires integration of planning processes for transportation, land-use and housing and generally encourages jobs/housing proximity, promote transit-oriented development, and encourages high-density residential/commercial development along transit corridors.

To implement SB 375 and reduce GHG emissions by correlating land use and transportation planning, SCAG adopted the 2024-2050 RTP/SCS, also referred to as Connect SoCal. The 2024-2050 RTP/SCS's "Core Vision" prioritizes the maintenance and management of the region's transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and complete streets.

On a local level, the City has developed the Complete Streets Design Guide, which provides a number of reduction strategies to increase public access to electric shuttles, car sharing and walking, continues to build out networks in the Mobility Plan for pedestrians, bicyclists, and transit users, has implemented an EV car sharing network, and is working towards increasing publicly available chargers, and introducing new electric DASH buses.

The Project's consistency with these strategies is largely demonstrated by its consistency with SCAG's 2024-2050 RTP/SCS, which is addressed and explained earlier in this subsection.

Building Decarbonization

The priority GHG reduction strategies for local government climate action related to electrification are discussed below and would support the Scoping Plan actions regarding meeting increased demand for electrification without new fossil gas-fired resources and all electric appliances beginning in 2026 (residential) and 2029 (commercial).

- **Adopt all-electric new construction reach codes for residential and commercial uses.**

California's transition away from fossil fuel-based energy sources will bring the Project's GHG emissions associated with building energy use down to zero as the State's electric supply becomes 100 percent carbon free. California has committed to achieving this goal by 2045 through SB 100, the 100 Percent Clean Energy Act of 2018. SB 100 strengthened the State's RPS Standard by requiring that 60 percent of all electricity provided to retail users in California come from renewable sources by 2030 and that 100 percent come from carbon-free sources by 2045. The land use sector will benefit from RPS because the electricity used in buildings will be increasingly carbon-free, but implementation does not depend (directly, at least) on how buildings are designed and built.

The City has updated the LAMC with requirements for all new buildings, with some exceptions, to be all-electric, which will reduce GHG emissions related to natural gas combustion. Space heating, water heating, and cooking for non-restaurant uses would be required to be powered by electricity. In future years, LADWP will be required to increase the amount of renewable energy in the power mix to comply with SB 100 requirements. The combination of all-electric LAMC regulations and increasing availability of renewable energy will serve to reduce GHG emissions from sources traditionally powered by natural gas. The Project will not include any natural gas use and so will exceed the requirements of the LAMC.

- **Adopt policies and incentive programs to implement energy efficiency retrofits for existing buildings, such as weatherization, lighting upgrades, and replacing energy-intensive appliances and equipment with more efficient systems (such as Energy Star-rated equipment and equipment controllers).**

This reduction strategy would support the Scoping Plan action regarding electrification of appliances in existing residential buildings. The City and LADWP have established rebate programs to promote use of energy-efficient products and home upgrades. Under LADWP's Consumer Rebate Program, residential customers would receive rebates for energy-efficient upgrades such as Cool Roofs, Energy Star Windows, HVAC upgrades, pool pumps and insulation upgrades. Such upgrades would serve to reduce wasteful energy and water use and associated GHG emissions.

The Project would not involve the retrofit of existing buildings. Therefore, the Project would not conflict with policies to implement energy efficiency retrofits.

Green New Deal

The Green New Deal provides information as to what the City will do with buildings and infrastructure in its control, and it provides aspirational targets related to housing and development, as well as mobility and transit, that are related to GHG reduction. For example, targets include reducing VMT per capita five percent by 2025 and increasing trips made by walking, biking, or transit 35 percent by 2025. The Green New Deal has also established increased renewables requirements for LADWP. Regarding housing, the Green New Deal aspires that 75 percent of new housing units are built within 1,500 feet of transit by 2035.

The Project would generally comply with these aspirations as it proposes development in an urban infill location that would promote increases in transit and active mode shares. Further, the Project would comply with CALGreen and would comply with the City's Solid Waste Management Policy Plan, the RENEW LA Plan, and the Exclusive Franchise System Ordinance (Ordinance No. 182,986) in furtherance of the aspirations included in the Green New Deal regarding energy-efficient buildings and waste and landfills. The Project would also provide secure short- and long-term bicycle storage areas for employees and visitors. Therefore, the Project would be consistent with the Green New Deal, and impacts would be less than significant.

Plan Consistency Conclusion

In summary, the Project's location, land use characteristics, and design would be consistent with 2024-2050 RTP/SCS, 2022 Scoping Plan Update, and Green New Deal efforts and strategies to reduce GHG emissions in accordance with the latest and most stringent AB 1279 and SB 375 targets. As a result, the Project's impacts related to GHG emissions and climate change would be less than significant.

Project GHG Emissions

Construction

Project construction is anticipated to be completed in 2028. A summary of construction details (e.g., schedule, equipment mix, and vehicular trips) and CalEEMod modeling output files are provided in Appendix E of this IS/MND. The GHG emissions associated with construction of the Project were calculated for each year of construction activity.

Construction of the Project is estimated to generate a total of 460 $MTCO_2e$ (Table VIII-4). As recommended by the SCAQMD, the total GHG construction emissions were amortized over the 30-year lifetime of the Project (i.e., total construction GHG emissions were divided by 30 to determine an annual construction emissions estimate that can be added to the Project's

operational emissions) to determine the Project's annual GHG emissions inventory.[48] This results in annual Project construction emissions of 15 $MTCO_2e$. A complete listing of the construction equipment by on-site and off-site activities, duration, and emissions estimation model input assumptions used in this analysis is included within the emissions calculation worksheets that are provided in Appendix E of this IS/MND.

Table VIII-4
Combined Construction-Related Emissions ($MTCO_2e$)

Year	$MTCO_2e$[a]
2027	150
2028	310
Total	**460**
Amortized Over 30 Years	**15**

a CO_2e was calculated using CalEEMod version 2022.1.1.24. Detailed results are provided in Appendix E of this IS/MND.
Source: DKA Planning, 2024.

Operation

Area Source Emissions

Area source emissions were calculated using the CalEEMod emissions inventory model, which includes landscape maintenance equipment, use of consumer products, and other everyday sources. As shown in Table VIII-5, the Project would result in less than two $MTCO_2e$ per year from area sources.

Table VIII-5
Annual GHG Emissions Summary (Buildout)[a]
(metric tons of carbon dioxide equivalent [MTCO2e])

Source Category	$MTCO_2$[a]
Area[b]	2
Energy[c] (electricity)	491
Mobile	374
Solid Waste[d]	32
Water/Wastewater[e]	65
Refrigerants	3
Construction	16
Total Emissions	**983**

a CO_2e was calculated using CalEEMod and the results are provided in the Technical Appendix.
b Area source emissions are from landscape equipment and other operational equipment only; hearths omitted.
c Energy source emissions are based on CalEEMod default electricity and natural gas usage rates. CalEEMod v2022.1.1.24 still quantifies natural gas emissions for retail and parking garage uses even when uses are powered by electricity.
d Solid waste emissions are calculated based on CalEEMod default solid waste generation rates.

[48] SCAQMD Governing Board Agenda Item 31, December 5, 2008.

[e] Water/Wastewater emissions are calculated based on CalEEMod default water consumption rates.

Source: DKA Planning, 2024.

Electricity Emissions

GHG emissions are emitted because of activities in buildings when electricity and natural gas are used as energy sources. However, the Project would not use any natural gas. Combustion of any type of fuel emits CO_2 and other GHG emissions directly into the atmosphere; when this occurs in a building, it is a direct emission source associated with that building. GHG emissions are also emitted during the generation of electricity from fossil fuels. When electricity is used in a building, the electricity generation typically takes place off-site at the power plant; electricity use in a building generally causes emissions in an indirect manner.

Electricity emissions were calculated for the Project using the CalEEMod emissions inventory model, which multiplies an estimate of the energy usage by applicable emissions factors chosen by the utility company. GHG emissions from electricity use are directly dependent on the electricity utility provider. In this case, GHG emissions intensity factors for LADWP were selected in CalEEMod. The carbon intensity ((pounds per megawatt an hour (lbs/MWh)) for electricity generation was calculated for the Project buildout year based on LADWP projections. A straight-line interpolation was performed to estimate the LADWP carbon intensity factor for the Project buildout year. LADWP's carbon intensity projections also consider SB 350 RPS requirements for renewable energy.

This approach is conservative, given the 2018 chaptering of SB 100 (De Leon), which requires electricity providers to provide renewable energy for at least 60 percent of their delivered power by 2030 and 100 percent use of renewable energy and zero-carbon resources by 2045. SB 100 also increases existing renewable energy targets, called Renewables Portfolio Standard (RPS), to 44 percent by 2024 and 52 percent by 2027.

The 2022 Title 24 standards contain more substantial energy efficiency requirements for new construction, emphasizing the importance of building design and construction flexibility to establish performance standards that substantially reduce energy consumption for water hating, lighting, and insulation for attics and walls. Future Title 24 standards that would apply to the Project would further reduce energy consumption.

Energy use in buildings is divided into energy consumed by the built environment and energy consumed by uses that are independent of the construction of the building, such as in plug-in appliances. CalEEMod calculates energy use from systems covered by Title 24 (e.g., HVAC system, water heating system, and lighting system); energy use from lighting; and energy use from office equipment, appliances, plug-ins, and other sources not covered by Title 24 or lighting. While the Project is expected to be powered by electricity, the emissions estimates from CalEEMod still include emissions from natural gas combustion, pending updates to the model. As

such, the estimates in this analysis overstate energy-related GHG emissions as the Project would not use natural gas.

CalEEMod electricity usage rates are based on the CEC-sponsored California Commercial End-Use Survey (CEUS) and the California Residential Appliance Saturation Survey (RASS) studies.[49] The data are specific for climate zones; therefore, Zone 11 was selected for the Project Site based on the zip code tool.

As shown in Table VIII-5, Project GHG emissions from electricity usage would result in a total of 491 $MTCO_2e$ per year.

Mobile Source Emissions

Mobile-source emissions were calculated using the SCAQMD-recommended CalEEMod emissions inventory model. CalEEMod calculates the emissions associated with on-road mobile sources associated with employees, visitors, and delivery vehicles visiting the Project Site based on the number of daily trips generated and VMT.

Mobile source operational GHG emissions were calculated using CalEEMod and are based on the Project trip-generation estimates. To calculate daily trips, the size of the retail and warehouse uses were multiplied by the applicable trip-generation rates based on the Institute of Transportation Engineers (ITE)'s *Trip Generation, 11th Edition*.

The Project represents an infill development within an urbanized area that would concentrate self-storage uses within an HQTC.[50] The Project Site is in the dense Jefferson Boulevard corridor with proximity to Metro, LADOT, and Culver City local bus services. The Project would also provide bicycle parking and storage areas for Project employees and visitors.

CalEEMod calculates VMT based on the type of land use, trip purpose, and trip type percentages for each land use subtype in the project (primary, diverted, and pass-by). As shown in Table VIII-5, the Project GHG emissions from mobile sources would result in a total of 374 $MTCO_2e$ per year. This estimate reflects reductions attributable to the Project's characteristics (e.g., infill project near transit that supports multi-modal transportation options), as described above.

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[49] California Energy Commission, Commercial End-Use Survey, March 2006, and California Residential Appliance Saturation Survey, October 2010.

[50] The Project Site is also located in Transit Priority Area as defined by Public Resources Code Section 20199. Public Resources Code Section 21099 defines a "transit priority area" as an area within 0.5 miles of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations." Public Resources Code Section 21064.3 defines "major transit stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." Also refer to the City's ZIMAS System regarding the location of the Project Site within a Transit Priority Area.

Solid Waste Generation Emissions

Emissions related to solid waste were calculated using the CalEEMod emissions inventory model, which multiplies an estimate of the waste generated by applicable emissions factors provided in Section 2.4 of the USEPA's AP-42, Compilation of Air Pollutant Emission Factors. CalEEMod solid waste generation rates for each applicable land use were selected for this analysis. As shown in Table VIII-5, the Project is expected to result in a total of 32 $MTCO_2e$ per year from solid waste that accounts for a 50-percent recycling/diversion rate.[51]

Water Usage and Wastewater Generation Emissions

GHG emissions are related to the energy used to convey, treat, and distribute water, and treat wastewater. Thus, these emissions are generally indirect emissions from the production of electricity to power these systems. Three processes are necessary to supply potable water; these include (1) supply and conveyance of the water from the source; (2) treatment of the water to potable standards; and (3) distribution of the water to individual users. After use, energy is used as the wastewater is treated and reused as reclaimed water.

Emissions related to water usage and wastewater generation were calculated for the Project using the CalEEMod emissions inventory model, which multiplies an estimate of the water usage by the applicable energy intensity factor to determine the embodied energy necessary to supply potable water.[52] GHG emissions are then calculated based on the amount of electricity consumed multiplied by the GHG emissions intensity factors for the utility provider. In this case, embodied energy for Southern California supplied water and GHG emissions intensity factors for LADWP were selected in CalEEMod. Water usage rates were calculated consistent with the requirements under City Ordinance No. 184,248, 2022 California Plumbing Code (which is based on the 2021 Uniform Plumbing Code), 2022 CALGreen, Los Angeles Plumbing Code, and Los Angeles Green Building Code, and reflect an approximately 20-percent reduction as compared to the base demand.

LADWP's programs includes programs designed to reduce indoor water consumption and wastewater generation by 20 percent. These include the 2022 requirements for installation of the latest ultra-high efficiency plumbing fixtures, the standards that promote increasing water-resistant turf and incorporating rainfall capture techniques in project designs, aggressive outdoor water consumption programs through its Landscape ordinance, and water recycling programs designed to increase recycled water to 59,000 acre-feet by 2035.

As shown in Table VIII-5, Project GHG emissions from water/wastewater usage would result in a total of 65 $MTCO_2e$ per year, which reflects a 20-percent reduction in water/wastewater emissions

[51] AB 341 (2012) increased the Statewide waste diversion goal from 50 to 75 percent from baseline rates established by CalRecycle by 2020 and beyond. Further, SB 1383 (2016) requires jurisdictions to reduce 75 percent of organic waste disposal in landfills by 2030.

[52] The intensity factor reflects the average pounds of CO_2e per megawatt generated by a utility company.

consistent with building code requirements as compared to the Project without sustainability features related to water conservation.

Refrigerants

Emissions related to cooling structures and refrigeration needs were calculated using the CalEEMod emissions inventory model. As shown in Table VIII-5, the Project scenario is expected to result in a total of three $MTCO_2e$ per year from use of refrigerants that used HFCs and have high GWP values.

Combined Construction and Operational Emissions

As shown in Table VIII-5, when taking into consideration implementation of requirements set forth in the City's Green Building Code and the full implementation of current state mandates, the GHG emissions for the Project would equal 983 $MTCO_2e$ annually, including amortized construction emissions.

Conclusion

The emission of GHGs by a single project into the atmosphere is not itself necessarily an adverse environmental effect. Rather, it is the increased accumulation of GHG from more than one project and many sources in the atmosphere that may result in global climate change. The consequences of that climate change can cause adverse environmental effects. A project's GHG emissions typically would be very small in comparison to state or global GHG emissions and, consequently, they would, in isolation, have no significant direct impact on climate change. The State has mandated goals of reducing statewide emissions to 1990 levels, even though statewide population and commerce is predicted to continue to expand. In order to achieve this goal, CARB has adopted various plans and regulations to reduce statewide GHG emissions.

Consistent with CEQA Guidelines Section 15064(h)(3), the City as Lead Agency has determined that the Project's contribution to cumulative GHG emissions and global climate change would be less than significant if the Project is consistent with the applicable regulatory plans and policies to reduce GHG emissions: CARB's 2022 Scoping Plan, the 2024-2050 RTP/SCS, and the City of Los Angeles Green New Deal.

Given the Project's consistency with these State, regional, and City of Los Angeles GHG emission reduction goals and objectives, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. In the absence of adopted standards and established significance thresholds, and given this consistency, the Project's impacts are cumulatively less than significant.

IX. HAZARDS AND HAZARDOUS MATERIALS

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

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

Less Than Significant Impact. A significant impact may occur if a project would involve the use or disposal of hazardous materials as part of its routine operations or would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect the public or the environment. Construction of the Project would not use a significant amount of hazardous materials, and the types of hazardous materials that would be used during construction of the Project would be typical of those hazardous materials necessary for construction of similar

commercial buildings (e.g., paints, solvents, fuel for construction equipment, building materials, etc.). While construction of the Project would require the temporary transport, use, and disposal of hazardous waste, construction activities associated with the Project would be required to comply with all applicable federal, state, and local regulations governing such activities. As the Project would not use a significant amount of hazardous materials during construction, it would not create a significant hazard to the public or the environment, and this impact would be less than significant.

The Project includes the construction of a new mixed-use mini-warehouse building on the Project Site. To the extent that the Project would require the transport, use, or disposal of small amounts of hazardous materials during operation (such as commercial-grade cleaning solvents, paints, or bleach, etc.), the use of these materials would be in accordance with existing local, state, and federal regulations, which would ensure the transport, storage, and use of these materials would not pose a significant hazard to the public or the environment. Therefore, the Project's impacts would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project could potentially pose a hazard to the public or the environment by releasing hazardous materials into the environment through accident or upset conditions. The Project would construct a three-story mixed-use mini-warehouse building with basement on the currently undeveloped portion of the Project Site, which would result in an expansion of the mini-warehouse uses and addition of retail uses on the Project Site. As described above, the use of any hazardous materials would be in accordance with existing local, state, and federal regulations, which would ensure the transport, storage, and use of these materials would not pose a significant hazard to the public or the environment. The Project Site is also located within a City of Los Angeles Methane Zone. Therefore, the Project would be required to comply with the City's methane mitigation regulations related to development in methane zones. Compliance with these existing regulations would ensure that Project impacts are less than significant.

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

Less Than Significant Impact. A significant adverse effect may occur if a project site is located within one-quarter mile of an existing or proposed school site and is projected to release toxic emissions which pose a health hazard beyond regulatory thresholds. The Animo Westside Charter Middle School is located within one-quarter mile of the Project Site. In addition, Playa del Rey Elementary School and Westside Neighborhood School are located in the general Project area (at a greater distance than one-quarter mile).

The types of hazardous materials that would be used during Project construction activities would be typical of those hazardous materials necessary for construction (e.g., paints, solvents, fuel for construction equipment, building materials, etc.), which could emit hazardous emissions. Furthermore, the proposed use is the same as the existing use, with retail, and would not result in substantial changes in use, handling, emissions, or disposal of hazardous materials. However, the use of these materials would comply with all applicable federal, state, and local regulations. In addition, there are intervening structures and roadways between the schools and the Project Site, and the distance between the Project Site and the nearest schools would ensure that the Project's use of these materials would not pose a hazard to these schools.

While the Project would be operational during school hours, to the extent that the Project would require the use of hazardous materials, such use would be in accordance with existing local, state, and federal regulations. In addition, there are intervening structures and roadways between the schools and the Project Site. Therefore, the Project would not pose a significant risk involving the routine transport, use, and disposal of hazardous materials or the accidental release of hazardous materials, and impacts associated with the emission of hazardous materials near an existing or proposed school would be less than significant.

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

No Impact. California Government Code Section 65962.5 requires various state agencies, including but not limited to, the Department of Toxic Substances Control (DTSC) and SWRCB, to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities where there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis, commonly referred to as the "Cortese List." A significant impact may occur if a project site is included on any of the above lists and poses an environmental hazard to surrounding sensitive uses.

According to EnviroStor, there are no cleanup sites, permitted sites, or SLICS (Spills, Leaks, Investigation, and Cleanup) on the Project Site.[53] According to GeoTracker, there are no other cleanup sites, land disposal sites, military sites WDR sites, permitted UST (Underground Storage Tank) facilities, monitoring wells, or California Department of Toxic Substance Control (DTSC) cleanup sites or hazardous materials permits on the Project Site.[54] The Project Site has not been

[53] California Department of Toxic Substance Control, EnviroStor, website: https://www.envirostor.dtsc.ca.gov/public/search?cmd=search&reporttype=CORTESE&site_type=CSITES,FUDS&status=ACT,BKLG,COM&reporttitle=HAZARDOUS+WASTE+AND+SUBSTANCES+SITE+LIST+%28CORTESE%29, accessed March 20 2024.

[54] California State Water Resources Control Board, GeoTracker, website: https://geotracker.waterboards.ca.gov/search?CMD=search&case_number=&business_name=&main_street_name=&city=&zip=&county=&SITE_TYPE=LUFT&oilfield=&STATUS=&BRANCH=&MASTER_BASE=&Search=Search, accessed March 20, 2024.

identified as a solid waste disposal site having hazardous waste levels outside of the Waste Management Unit.[55] In addition, there are no active Cease and Desist Orders or Cleanup and Abatement Orders from the California Water Resources Control Board associated with the Project Site.[56] Finally, the Project Site is not subject to corrective action pursuant to the Health and Safety Code, as it has not been identified as a hazardous waste facility.[57] Therefore, the Project would not create a hazard to the public or the environment, and no impact would occur.

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?

Less Than Significant Impact. A significant impact may occur if a project is located within an airport land use plan, or within two miles of a public airport or public use airport, and would subject people residing or working in the area to a safety hazard or excessive noise levels. The Project Site is located within two miles of the Los Angeles International Airport (LAX). However, the Project Site is not located within the Airport Influence Area.[58] The height of the Project would be comparable to existing structures in the area, including the existing building on the Project Site, which would remain as part of the Project. In addition, people working at the Project Site would not be exposed to air traffic generated noise in excess of existing conditions. Thus, implementation of the Project would not have the potential to exacerbate current environmental conditions as to result in a safety hazard or excessive noise for people residing or working in the area of the Project Site, and impacts would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project were to interfere with roadway operations used in conjunction with an emergency response plan or emergency evacuation plan or would generate traffic congestion that would interfere with the execution of such a plan. While it is expected that the majority of construction activities for the Project would be confined to the Project Site, temporary and limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially affect emergency access adjacent to the Project Site. Access to the Project Site and surrounding area during construction of the Project would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency

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[55] California Environmental Protection Agency, Cortese List Data Resources, Sites Identified with Waste Constituents Above Hazardous Waste Levels Outside the Waste Management Unit, website: https://calepa.ca.gov/wp-content/uploads/sites/6/2016/10/SiteCleanup-CorteseList-CurrentList.pdf, accessed March 20, 2024.

[56] California Environmental Protection Agency, Cortese List Data Resources, List of "Active" CDO and CAO from Water Board, website: http://www.calepa.ca.gov/sitecleanup/corteselist/, accessed March 20, 2024.

[57] California Environmental Protection Agency, Cortese List Data Resources, Cortese List: Section 65962.5(a), website: https://calepa.ca.gov/sitecleanup/corteselist/section-65962-5a/, accessed March 20, 2024.

[58] Los Angeles County Airport Land Use Commission, Los Angeles County Airport Land Use Plan, December 1, 2004.

access. Furthermore, prior to the issuance of a building permit, the Project Applicant would be required by the Los Angeles Fire Department (LAFD) and the Department of Building and Safety to develop an emergency response plan for the Project in consultation with the LAFD and the Los Angeles Department of Transportation (LADOT). The emergency response plan shall include but not be limited to the following: mapping of emergency exits, evacuation routes for vehicles and pedestrians, location of nearest hospitals, and fire departments. Preparation and implementation of the Project-specific emergency response plan as required by City regulations would ensure that Project impacts related to emergency response would be less than significant.

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

No Impact. A significant impact may occur if a project is located in proximity to wildland areas and poses a potential fire hazard, which could affect persons or structures in the area in the event of a fire. The Project Site is not located in a Very High Fire Hazard Severity Zone.[59] Therefore, no impact would occur.

Cumulative Impacts

Due to their site-specific nature, impacts with respect to hazards and hazardous materials are also typically addressed on a project-by-project basis. Therefore, as with the Project, related projects would address site-specific hazards through the implementation of site-specific recommendations and/or mitigation measures. In addition, like the Project, all related projects would be subject to local, state, and federal regulations pertaining to hazardous materials. Therefore, cumulative impacts with respect to hazards and hazardous materials would be less than significant.

[59] City of Los Angeles, ZIMAS Parcel Profile Report, website: http://zimas.lacity.org, March 20, 2024.

X. HYDROLOGY AND WATER QUALITY

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

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

Less Than Significant Impact. A significant impact may occur if a project discharges water which does not meet the quality standards of agencies that regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts would also occur if a project does not comply with all applicable regulations with regard to surface water quality as governed

by the State Water Resources Control Board (SWRCB). During construction of the Project, particularly during the grading and excavation phases, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. Pollutant discharges relating to the storage, handling, use and disposal of chemicals, adhesives, coatings, lubricants, and fuel could also occur. Thus, a significant impact could occur if a project discharges water that does not meet the quality standards of agencies that regulate surface water quality and water discharge into storm water drainage systems or would not comply with all applicable regulations as governed by the Los Angeles Regional Water Quality Control Board (LARWQCB).

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

Stormwater runoff generated during operation of the Project has the potential to introduce small amounts of pollutants (e.g., typical commercial cleaning products, landscaping pesticides, and vehicle petroleum products) into the stormwater system. Stormwater runoff from precipitation events could carry urban pollutants into municipal storm drains, however during operation the Project would be required to comply with the City's Low Impact Development (LID) Ordinance. The LID Ordinance applies to all development and redevelopment projects in the City that require a building permit. LID plans are required to include a site design approach and BMPs that address runoff and pollution at the source. Further, to comply with LID Ordinance, the Project would be required to capture and treat the first ¾-inch of rainfall in accordance with established stormwater treatment protocols. Regulatory compliance with the LID Ordinance would reduce the amount of surface water runoff leaving the Project Site as compared to the current conditions. Regulatory compliance with the LID Plan and Standard Urban Stormwater Mitigation Plan (SUSMP), including the implementation of BMPs, would ensure that operation of the Project would not violate water quality standard and discharge requirements or otherwise substantially degrade water quality.

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

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

Less Than Significant Impact. A significant impact may occur if a project includes deep excavations resulting in the potential to interfere with groundwater movement or includes withdrawal of groundwater or paving of existing permeable surfaces important to groundwater recharge. The Project Site is located in an urbanized area of the City and is partially developed with impervious surfaces (mini-warehouse building and surface parking lot). During a storm event, stormwater runoff flows to the adjacent roadways where it is directed into the City's storm drain system. As such, the Project Site is not a source of groundwater recharge. Following redevelopment of the Project Site, groundwater recharge would remain negligible, similar to existing conditions.

Based on the Geotechnical Investigation conducted for the Project Site (refer to Appendix D of this IS/MND), groundwater was encountered within the test borings at depths of approximately 15 to 25 feet below grade, while the historic high groundwater depth for the Project Site is approximately 7 feet below grade.[60] If any dewatering operations are required during construction, they would be conducted in compliance with all applicable regulations and requirements, including with all relevant NPDES requirements related to construction and discharges from dewatering operations. Due to the operation of dewatering systems being temporary, local groundwater hydrology in the immediate vicinity of the Project Site would be minimally affected. Finally, all water consumption associated with the Project would be supplied by LADWP and not from any groundwater beneath the Project Site. Thus, impacts related to groundwater would be less than significant.

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

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

Less Than Significant Impact. A significant impact may occur if a project results in a substantial alteration of drainage patterns that would result in a substantial increase in erosion or siltation. The Project Site is located in a highly urbanized area of the City, and there are no natural watercourses on the Project Site. As discussed above, the Project Site is partially developed with impervious surfaces (mini-warehouse building and surface parking lot). Current stormwater runoff flows to the local storm drain system. Under the post-Project condition, the Project Site would be developed with additional impervious surfaces, based on the addition of the proposed building. The Project Applicant would be required to prepare a SWPPP and implement BMPs to reduce runoff and preserve water quality during construction of the Project. In addition, the Project

[60] Geotechnical Analysis, Giles Engineering Associates, Inc., March 20, 2024, page 6.

Applicant would be required to implement a LID Plan (during operation), which would reduce the amount of surface water runoff leaving the Project Site after a storm event. Specifically, the LID Plan would require the implementation of stormwater BMPs to retain or treat the runoff from a storm event producing ¾-inch of rainfall in a 24-hour period. Therefore, the Project would not result in substantial erosion or siltation on- or off-site, and impacts would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project results in increased runoff volumes during construction or operation of the project that would result in flooding conditions affecting the Project Site or nearby properties. Project construction activities on the Project Site may temporarily alter the existing drainage patterns and change off-site flows. However, construction and operation of the Project would not result in a significant increase in site runoff or any changes in the local drainage patterns that would result in flooding on- or off-site, as the Project Site is currently developed with a mini-warehouse building and associated parking lot, which would be retained as part of the Project. The Project would be required to prepare a SWPPP and implement BMPs to reduce runoff and preserve water quality during construction of the Project. Regulatory compliance with the LID Ordinance would also reduce the amount of surface water runoff leaving the Project Site. Project impacts would therefore be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project would increase the volume of stormwater runoff to a level that exceeds the capacity of the storm drain system serving the Project Site, or if a project would substantially increase the probability that polluted runoff would reach storm drains. Runoff from the Project Site currently is and would continue to flow toward the existing storm drain system. Three general sources of potential short-term construction-related stormwater pollution associated with the Project are: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth moving activities which, when not controlled, may generate soil erosion and transportation, via storm runoff or mechanical equipment.

Pursuant to City policy, stormwater retention would be required as part of the LID/SUSMP implementation features (despite no increase of imperviousness surfaces on the Project Site). Any contaminants gathered during routine cleaning of construction equipment would be disposed of in compliance with applicable stormwater pollution prevention permits. During construction, the Applicant will be required to demonstrate compliance with NPDES permitting, and will implement all applicable and mandatory BMPs in accordance with the approved LID Plan and the SWPPP.

These "good-housekeeping" practices would ensure that short-term construction-related activities would not result in polluted stormwater leaving the site.

Pollutants resulting from Project operation, including petroleum products associated with the Project's parking and circulation areas, would be subject to the requirements and water quality standards and wastewater discharge BMPs set forth by the City, the SWRCB, and the Project's approved LID Plan. Further, the Project would be required to comply with the NPDES and applicable LID Ordinance requirements. Accordingly, the Project would be required to demonstrate compliance with LID Ordinance standards and retain or treat the first three-quarters inch of rainfall in a 24-hour period. Thus, the Project would not create or contribute surface runoff that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Therefore, Project impacts related to storm drain capacity and water quality would be less than significant.

iv. Impede or redirect flood flows?

No Impact. The Project Site is not located near any bodies of water, rivers, or streams that are subject to flooding. Thus, the Project would not have the potential to impede or redirect flood flows and no impact related to this issue would occur.

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

No Impact. A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant disturbance undersea, such as a tectonic displacement of sea floor associated with large, shallow earthquakes. Mudflows occur as a result of downslope movement of soil and/or rock under the influence of gravity. The Project Site is not located within a 100-year flood zone, as mapped by the Federal Emergency Management Agency (FEMA, Flood Insurance Rate Map number 06037C1760F).[61] Further, the Project Site is noy located in a Tsunami Hazard Zone.[62] Therefore, the Project would not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow, and no impact would occur.

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

Less Than Significant Impact. The Project is within the jurisdiction of the LARWQCB, and construction activities associated with the implementation of the Project could impact water quality due to erosion resulting from exposed soils that may be transported from the Project Site in

[61] FEMA Flood Map Service Center, Search by Address, accessed March 20,2024.

[62] City of Los Angeles, ZIMAS Parcel Profile Report, website: http://zimas.lacity.org, March 20, 2024.

stormwater runoff. Compliance with the NPDES program would ensure that stormwater pollutants would not substantially degrade water quality. Further, the Project would be required to comply with the City's SUSMP requirements. Compliance with these regulations would ensure that Project impacts with respect to a water quality control plan or groundwater management plan would be less than significant.

Cumulative Impacts

The Project would be located in an urbanized area where most of the surrounding properties are already developed. The existing storm drainage system serving this area has been designed to accommodate runoff from an urban built-out environment. When new construction occurs, it generally does not lead to substantial additional runoff, since new developments are required to control the amount and quality of stormwater runoff coming from their respective sites. All new development in the City, such as the Project and the related projects, is required to comply with the City's LID Ordinance and incorporate appropriate stormwater pollution control measures into the design plans to ensure that water quality impacts are minimized. Therefore, cumulative impacts related to hydrology and water quality would be less than significant.

XI. LAND USE AND PLANNING

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

a. Physically divide an established community?

No Impact. A significant impact may occur if a project is sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community (a typical example would be a project which involved a continuous right-of-way such as a roadway which would divide a community and impede access between parts of the community). The Project Site is located in a highly urbanized area of the City currently developed with commercial uses and associated surface parking. Additionally, the Project Site is entirely surrounded by existing development and roadways. Regarding the surrounding land uses, the Project would provide commercial and mini warehouse uses in an area containing similar uses. As such, the Project would be compatible with and complement existing and proposed uses in the surrounding area and would not be of a density, scale, or height to constitute a physical barrier separating an established community. Thus, no impact would occur.

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

Less Than Significant Impact. A project is considered consistent with the provisions and general policies of an applicable City or regional land use plans and regulations if it is consistent with the overall intent of the plans and would not preclude the attainment of its primary goals.[63] More specifically, according to the ruling in *Sequoyah Hills Homeowners Association v. City of Oakland*, state law does not require an exact match between a project and the applicable general plan. Rather, to be "consistent," the project must be "compatible with the objectives, policies, general land uses, and programs specified in the applicable plan," meaning that a project must be in "agreement or harmony" with the applicable land use plan to be consistent with that plan.

Various local and regional plans and regulatory documents guide development of the Project Site. The following discussion addresses the Project's consistency with the requirements and policies

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

of SCAG's RTP/SCS, the City's General Plan (including the Framework Element), and the Palms – Mar Vista – Del Rey Community Plan, to the extent that various goals, objectives, and policies of these plans have been adopted for the purpose of avoiding or mitigating an environmental effect.

As discussed below, the Project would be substantially consistent with all of the applicable plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect associated with development of the Project Site. Therefore, Project impacts related to land use and planning would be less than significant, as further described below.

Regional

SCAG's 2024-2050 RTP/SCS

SB 375 requires MPOs such as SCAG to revise and update their RTPs and SCS' periodically. On September 3, 2020, SCAG's Regional Council formally adopted the 2024-2050 RTP/SCS (also known as Connect SoCal). The 2024-2050 RTP/SCS is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. It charts a path toward a more mobile, sustainable, and prosperous region by making connections between transportation networks, between planning strategies and between the people whose collaboration can improve the quality of life for Southern Californians.

The 2024-2050 RTP/SCS outlines more than $638 billion in transportation system investments through 2045 and was prepared through a collaborative, continuous, and comprehensive process with input from local governments, county transportation commissions, tribal governments, non-profit organizations, businesses and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura. The 2024-2050 RTP/SCS includes strategies for accommodating projected population, household, and employment growth in the SCAG region by 2045 as well as a transportation investment strategy for the region. These land use strategies are directly tied to supporting related GHG emissions reductions through increasing transportation choices with a reduced dependence on automobiles and an increase growth in walkable, mixed-use communities and HQTCs and by encouraging growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, supporting implementation of sustainability policies, and promoting a green region.

Prcject Consistency Discussion

As discussed on Table XI-1, the Project would be substantially consistent with the applicable goals contained in the 2024-2050 RTP/SCS.

Table XI-1
Project Consistency with the 2024-2050 RTP/SCS

Goals	Consistency Assessment
Mobility	
07 Encourage and support the implementation of projects, both physical and digital, that facilitate multimodal connectivity, prioritize transit and shared mobility, and result in improved mobility, accessibility and safety.	**No Conflict.** The Project would provide additional employment opportunities on a site that is well served by transit, including Metro Line 110, LADOT Commuter Express Line 437B, Culver City Bus Line 4, and Playa Vista Daily Shuttle. These stops are located within walking distance of the Project Site and could increase transit usage over existing conditions. In addition, the Project would be developed in close proximity to existing residential and commercial uses, in an area that is served by a developed sidewalk network. The Project would also provide 64 bicycle parking spaces. As such, the Project could provide for increased mobility options.
09. Encourage residential and employment development in areas surrounding existing and planned transit/rail stations.	
Communities	
33. Promote the growth of origins and destinations, in areas with a proclivity toward multimodal options like transit and active transportation, to reduce single occupant vehicle (SOV) dependency and vehicle miles traveled.	**No Conflict.** The Project is an infill development in the dense Jefferson Boulevard corridor that will reduce the rate of growth in SOV use and congestion by virtue of the transit accessibility along this corridor. In addition, the Project's proximity to existing residential and commercial uses, particularly along Jefferson Boulevard, would reduce vehicle miles traveled and also result in increased combined trips across multiple destinations in the immediate vicinity of the Project Site, allowing for residents to access basic needs within a 15-minute walk or bike ride from their homes.
34. Seek to realize scale economies or a critical mass of jobs and destinations in areas across the region that can support non-SOV options and shorter trip distances, combined trips and reduced vehicle miles traveled.	
42. Promote 15-minute communities as places with a mix of complementary land uses and accessible mobility options that align with and support the diversity of places (or communities) across the region. These are communities where residents can either access their most basic, day-to-day needs within a 15-minute walk, bike ride or roll from their home or as places that result in fewer and shorter trips because of the proximity of complementary land uses.	
Environment	
48. Promote sustainable development and best practices that enhance resource conservation, reduce resource consumption and promote resilience.	**No Conflict.** The Project would comply with the California Green Building Code, and would also include sustainability features, including interior lights controlled by a motion detector, climate control, and solar panels on the roof.
49. Support communities across the region to advance innovative sustainable development practices.	
51. Reduce hazardous air pollutants and greenhouse gas emissions and improve air quality throughout the region through planning and implementation efforts.	**No Conflict.** As discussed above under both "Air Quality" and "Greenhouse Gas Emissions," the Project would result in less than significant impacts with respect to air quality and greenhouse gas emissions. In addition, as also discussed above, the Project is consistent with AB 32, SB 32, SB
52. Support investments that reduce hazardous air pollutants and greenhouse gas emissions.	

Table XI-1
Project Consistency with the 2024-2050 RTP/SCS

Goals	Consistency Assessment
	375, and other initiatives designed to reduce GHG emissions.
Economy	
82. Foster a positive business climate by promoting regional collaboration in workforce and economic development between cities, counties, educational institutions and employers.	**No Conflict.** The Project would increase employment opportunities at the Project Site. In addition, the proposed min-warehouse use would support small businesses in the area.
Source: 2024-2050 RTP/SCS. Section 3.3, Regional Planning Policies.	

Local

City of Los Angeles General Plan

The City's General Plan, adopted December 1996 and re-adopted August 2001, provides general guidance on land use issues for the entire City. The General Plan consists of a Framework Element (including chapters pertaining to Land Use and Urban Form and Neighborhood Design), a Land Use Element (comprising 35 community plans prepared for distinct geographic areas of the City), and 10 Citywide elements.

Framework Element

The Framework Element of the General Plan serves as guide for the City's overall long-range growth and development policies and serves as a guide to update the community plans and the Citywide elements. The Citywide elements address functional topics that cross community boundaries, such as transportation, and address these topics in more detail than is appropriate in the Framework Element, which is the "umbrella document" that provides the direction and vision necessary to bring cohesion to the City's overall general plan. The Framework Element provides a conceptual relationship between land use and transportation and provides guidance for future updates to the various elements of the General Plan but does not supersede the more detailed community and specific plans. The Land Use chapter of the Framework Element contains Long Range Land Use Diagrams that depict the generalized distribution of centers, districts, and mixed-use boulevards throughout the City, but the community plans determine the specific land use designations. The Land Use Element of the General Plan is contained within 35 community plans. The Project Site is located in the Palms – Mar Vista – Del Rey Community Plan (Community Plan) Area, discussed further below.

Project Consistency Analysis

As discussed on Table XI-2, the Project would be substantially consistent with applicable policies contained in the Framework Element.

Table XI-2
Project Consistency with Applicable Policies of the Framework Element

Objective	Project Consistency
Framework Element: Land Use Chapter	
Goal 3A A physically balanced distribution of land uses that contributes towards and facilitates the • City's long-term fiscal and economic viability, • Revitalization of economically depressed areas, • Conservation of existing residential neighborhoods, • Equitable distribution of public resources, • Conservation of natural resources, • Provision of adequate infrastructure and public services, • Reduction of traffic congestion and improvement of air quality, • Enhancement of recreation and open space opportunities, • Assurance of environmental justice and a healthful living environment, and • Achievement of the vision for a more livable city.	**Consistent.** The Project would expand the current mini-warehouse use on the Project Site by developing a new mixed-use building containing mini-warehouse and retail uses on the currently undeveloped portion of the Project Site. This would also provide new jobs to the area. The Project would also include 64 bicycle parking spaces, which would support bicycle use as a mode of transportation to and from the Project Site. In addition, the Project Site's location near robust transit opportunities (including Metro, Commuter Express, Culver City, and Playa Vista bus lines) would further reduce dependence on automobile travel, reducing VMT and associated GHG emissions and other pollutant emissions.
Policy 3.4.2 Encourage new industrial development in areas traditionally planned for such purposes generally in accordance with the Framework Long-Range Land Use Diagram and as specifically shown on the community plans.	**Consistent.** The Project includes the development of light industrial and commercial uses (mini-warehouse and retail uses) on a site that already contains mini-warehouse uses and that is designated for Light Manufacturing uses in the Palms – Mar Vista – Del Rey Community Plan.
Goal 3J Industrial growth that provides job opportunities for the City's residents and maintains the City's fiscal viability.	**Consistent.** The Project helps achieve this goal by expanding the current mini-warehouse use on the Project Site by developing a new building containing mini-warehouse and retail uses on the currently undeveloped portion of the Project Site. This would also provide new jobs to the area.
Objective 3.14 Provide land and supporting services for the retention of existing and attraction of new industries.	**Consistent.** The Project would provide mini-warehouse and retail uses, which are permitted by the Project Site zoning as well as by the Project Site's Light Industrial land use designation (with the General Plan Amendment to revise Footnote No. 1 and the Height District Change to Height District 2).
Policy 3.14.4 Limit the introduction of new commercial and other non-industrial uses in existing commercial manufacturing zones to uses which support the primary industrial function of the location in which they are located.	
Source: City of Los Angeles General Plan.	

Palms – Mar Vista – Del Rey Community Plan

The Community Plan is one of 35 Community Plans established for different areas of the City that are intended to implement the policies of the General Plan Framework. Together, the plans make up the Land Use Element of the General Plan. The Community Plan is intended to promote an arrangement of land uses, streets, and services, which will 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 Plan is also intended to guide development in order to create a healthful and pleasing environment. The community plans coordinate development among the various communities of Los Angeles and adjacent municipalities in a fashion both beneficial and desirable to the residents of the community.

Project Consistency Discussion

The Project supports the following Industrial Objective and Policy of the Community Plan:

- To provide a viable industrial base with job opportunities for residents with minimal environmental and visual impacts to the community. (Objective 3-1, page III-6).

- Designate and preserve lands for the continuation of existing industry and development of new industrial parks, research and development uses, light manufacturing and similar uses which provide employment opportunities. (Policy 3-1.1, page III-7).

The Project would be substantially consistent with this objective and policy contained in the Community Plan. The Project would expand the current mini-warehouse use on the Project Site by developing a new mixed-use building containing mini-warehouse and retail uses on the currently undeveloped portion of the Project Site. The proposed uses are permitted by the Project Site's existing zoning as well as the Project Site's Light Industrial land use designation (with the General Plan Amendment to revise Footnote No. 1 to indicate that Height District 2 is applicable to the Project Site and the Height District Change to Height District 2). However, these requested changes relate to the allowable FAR of the Project, and the height of the Project (at three stories) would be less than the adjacent existing building on the Project Site, which is four stories. The Project's proposed uses would also provide approximately nine employment opportunities for nearby residents. The proposed retail space and expansion of the current mini warehouse use will directly provide employment opportunities in a building designed to be compatible with the surrounding neighborhood. Finally, as discussed throughout this IS/MND, all of the Project's environmental impacts would be less than significant with a mitigation measure for tribal cultural resources. The Project's visual impacts would be less than significant and no mitigation would be required.

Preservation of industrial land remains an important Citywide policy objective. The proposed General Plan Amendment to revise Footnote No. 1 and the Height District Change to Height

District 2 would not change the Project Site's underlying industrial status, allowing expansion of a mini-warehouse use on a site that currently contains such uses and allowing for implementation of the Project's pedestrian friendly design with ground-floor retail and additional landscaping. Expanding this light industrial use with a mix of active retail allows for an increase in industrial and commercial employment for community residents, while keeping industrial uses in their appropriate areas. Furthermore, the Project would enhance the immediate neighborhood and surrounding community by providing amenities on the ground floor, with active retail space and landscaping, as well as much needed storage for local residences and businesses. Therefore, the Project would substantially conform with the purpose, intent and provisions of the General Plan, and the Palms – Mar Vista – Del Rey Community Plan.

Los Angeles Municipal Code

Development of the Project is subject to the constraints of the Los Angeles Municipal Code (LAMC), notably Chapter I, the Planning and Zoning Code. The requested uses are typically permitted in other commercial and industrial zones, and the mini-warehouse use is an existing use of the Project Site. The proposed arrangement of the building as well as the parking, loading areas, lighting, landscaping, and other improvements would be comparable to other commercial, industrial, and residential structures within the adjacent properties. Exterior lighting will be provided for security for staff and customers. Rooftop equipment will be screened by the parapet on the proposed building so as not to be visible from the public right-of-way. Landscaping will be provided per City requirements. As such, the Project would properly relate to the site and surroundings. If the requested actions are approved, the Project would not be in conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project adopted for the purpose of avoiding or mitigating an environmental effect.

Cumulative Impacts

Given the built-out conditions of the greater Los Angeles region, including the Project area, cumulative development likely would convert existing underutilized properties in the Los Angeles area to revitalized higher-density developments to respond to the need for housing, sources of employment, and associated retail land uses. The Project would implement important local and regional goals and policies for the Los Angeles area, which would assist the City in achieving short- and long-term planning goals and objectives related to reducing urban sprawl, efficiently utilizing existing infrastructure, reducing regional congestion, and improving air quality through the reduction of VMT. Like the Project, the related projects are subject to the same City development standards and requirements. The Project and the related projects are consistent with SCAG and other regional policies for promoting more intense land uses adjacent to transit stations and job centers. Therefore, cumulative impacts related to land use and planning would be less than significant.

XII. MINERAL RESOURCES

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

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

No Impact. A significant impact may occur if the Project Site is located in an area used or available for extraction of a regionally-important mineral resource, or if the Project would convert an existing or future regionally-important mineral extraction use to another use, or if the Project would affect access to a site used or potentially available for regionally-important mineral resource extraction. The Project Site is not located in a City-designated Mineral Resource Zone 2 Area (MRZ-2).[64] Therefore, the Project would have no impact with respect to the loss of availability of a known regionally-important mineral resource, and no impact would occur.

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

No Impact. A significant impact may occur if a project is located in an area used or available for extraction of a locally-important mineral resource extraction, and if the project converted an existing or potential future locally-important mineral extraction use to another use, or if the project affected access to a site used or potentially available for locally-important mineral resource extraction. Government Code Section 65302(d) states that a conservation element of the general plan shall address "minerals and other natural resources." According to the Conservation Element of the City of Los Angeles General Plan, sites that contain potentially significant sand and gravel deposits which are to be conserved follow the Los Angeles River flood plain, coastal plain, and other water bodies and courses and lie along the flood plain from the San Fernando Valley through Downtown Los Angeles. The Project Site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present,[65] and much of the area around

[64] City of Los Angeles, Safety Element of the General Plan, Oil Fields and Oil Drilling Areas in the City of Los Angeles, Exhibit E.

[65] Conservation Element of the City of Los Angeles General Plan, September 16, 2001, Exhibit A.

the Project Site has been developed with structures and is inaccessible for mining extraction.[66] Furthermore, the Project Site is developed and located in an urbanized area. The addition of the proposed mixed-use mini-warehouse building to the Project Site would not result in impacts associated with the loss or availability of a known mineral resource that would be of value to the region and the residents of the state, and no impact would occur.

Cumulative Impacts

With regard to cumulative effects on mineral resources, no such resources are located on the Project Site or in the surrounding area. In addition, the Project would have no impact on these resources, and therefore could not combine with other projects to result in cumulative impacts. Therefore, cumulative impacts with respect to mineral resources would be less than significant.

[66] Conservation Element of the City of Los Angeles General Plan, September 16, 2001; pg II-57.

XIII. NOISE

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

The analysis in this section is based on the following, which is included in Appendix F of this IS/MND:

F-1 Noise Technical Modeling, DKA Planning, February 2024.

F-2 Vibration Technical Modeling, DKA Planning, February 2024.

Existing Conditions

Noise-Sensitive Receptors

The Project Site is located on a major residential and commercial arterial in the Playa Vista community. Noise-sensitive receptors within 0.25 miles of the Project Site include, but are not limited to, the following representative sampling:

- Multifamily residences, 12665 Village Lane, approximately 120 feet south of the Project Site.
- Elementary School, 5456 McConnell Avenue, approximately 630 feet west of the Project Site.
- St. John's Health Center, approximately 780 feet east of the Project Site.

Existing Ambient Noise Conditions

The Project Site is partially improved with a mini-warehouse building and associated surface parking lot. There is intermittent noise from the operation of the parking lot, including tire friction as vehicles navigate to and from parking spaces, minor engine acceleration, doors slamming, and occasional car alarms. Most of these sources are instantaneous (e.g., car alarm chirp, door slam) while others may last a few seconds.

Traffic is the primary source of noise near the Project Site, largely from the operation of vehicles with internal combustion engines and frictional contact with the ground and air.[67] This includes traffic on Jefferson Boulevard, which carries about 3,293 vehicles at Westlawn Avenue in the A.M. peak hour.[68]

In October 2022, DKA Planning took short-term noise measurements near the Project Site to determine the ambient noise conditions of the neighborhood near sensitive receptors.[69] As shown in Table XIII-1, noise levels along roadways near the Project Site ranged from 56.2 to 67.8 dBA L_{eq}, based on exposure to traffic on Jefferson Boulevard, a major arterial that represents the major source of noise in the vicinity of the Project.

Table XIII-1
Existing Noise Levels

Noise Measurement Locations	Primary Noise Source	Sound Levels		Nearest Sensitive Receptor(s)	Noise/Land Use Compatibility[b]
		dBA (L_{eq})	dBA (CNEL)[a]		
A. 12665 Village Lane	Traffic on Jefferson Blvd.	67.8	65.8	Residences – 12665 Village Ln.	Conditionally Acceptable
B. Beatrice Street	Traffic on Beatrice St.	65.3	63.3	Residences – 5535 Westlawn Ave.; Production Studios – 12615 Beatrice St.	Conditionally Acceptable
C. 12855 Runway Road	Traffic on Jefferson Blvd.	64.5	62.5	Residences – 12855 Runway Rd.	Conditionally Acceptable
D. 12775 Millennium Drive	Traffic on Village Dr.	56.2	54.2	Residences – 12775 Millennium Dr.	Normally Acceptable

[a] Estimated based on short-term (15-minute) noise measurement using Federal Transit Administration procedures from 2018 Transit Noise and Vibration Impact Assessment Manual, Appendix E, Option 4.

[67] World Health Organization, https://www.who.int/docstore/peh/noise/Comnoise-2.pdf accessed March 18, 2021.

[68] DKA Planning 2023, based on City of Los Angeles database of traffic volumes on Jefferson Boulevard at Westlawn Avenue, https://navigatela.lacity.org/dot/traffic_data/automatic_counts/JEFFERSON.WESTLAWN.180418.pdf.

[69] Noise measurements were taken using a Quest Technologies Sound Examiner SE-400 Meter. The Sound Examiner meter complies with the American National Standards Institute (ANSI) and International Electrotechnical Commission (IEC) for general environmental measurement instrumentation. The meter was equipped with an omni-directional microphone, calibrated before the day's measurements, and set at approximately five feet above the ground.

[b] Pursuant to California Office of Planning and Research "General Plan Guidelines, Noise Element Guidelines, 2017. When noise measurements apply to two or more land use categories, the more noise-sensitive land use category is used.
Source: DKA Planning, 2024

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

Less Than Significant Impact.

Construction

On-Site Construction Activities

Project construction would generate noise during the approximately 12 months of demolition, site preparation, grading, utilities trenching, building construction, paving, and application of architectural coatings, as shown in Table III-4, above. During all construction phases, noise-generating activities could occur at the Project Site between 7:00 A.M. and 9:00 P.M. Monday through Friday, in accordance with LAMC Section 41.40(a). On Saturdays, construction would be permitted to occur between 8:00 A.M. and 6:00 P.M.

Noise levels would generally peak during the demolition and grading phases, when diesel-fueled heavy-duty equipment like excavators and dozers are used to move large amounts of debris and dirt, respectively. This equipment is mobile in nature and does not always operate at in a steady-state mode full load, but rather powers up and down depending on the duty cycle needed to conduct work. As such, equipment is occasionally idle during which time no noise is generated. During other phases of construction (e.g., trenching, building construction, paving, architectural coatings), noise impacts are generally less because they are less reliant on using heavy equipment with internal combustion engines. Smaller equipment such as forklifts, generators, and various powered hand tools and pneumatic equipment would often be utilized. This analysis assumes this and other on-site activities would be staged on-site during the phased construction process. Off-site secondary noises would be generated by construction worker vehicles, vendor deliveries, and haul trucks.

Because the Project's construction phase would occur for more than three months, the applicable City threshold of significance for the Project's construction noise impacts is an increase of 5 dBA over existing ambient noise levels, as identified in the 2006 L.A. CEQA Thresholds Guide. As shown in Table XIII-2, when considering ambient noise levels, the use of multiple pieces of powered equipment simultaneously would increase ambient noise negligibly. This assumes the use of best practices techniques required by the City's Building and Safety code, such as temporary sound barriers. These construction noise levels would not exceed the City's significance threshold of 5 dBA. Therefore, the Project's on-site construction noise impact would be less than significant.

Table XIII-2
Construction Noise Impacts at Off-Site Sensitive Receptors

Receptor	Maximum Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Ambient Noise Level (dBA L_{eq})	Increase (dBA L_{eq})	Potentially Significant?
1. Production Studios – 12615 Beatrice St.	34.4	65.3	65.3	0.0	No
2. Residences – 5535 Westlawn Ave.	43.9	65.3	65.3	0.0	No
3. Residences - 12665 Village Ln.	61.9	67.8	68.8	2.0	No
4. Residences – 12775 Millennium Dr.	49.0	56.2	57.0	0.8	No
5. Residences – 12855 Runway Rd.	42.3	64.5	64.5	0.0	No

Source: DKA Planning, 2024.

Off-Site Construction Activities

The Project would also generate noise at off-site locations from haul trucks moving debris and soil from the Project Site during demolition and grading activities, respectively; vendor trips; and worker commute trips. These activities would generate noise equivalent of up to an estimated 362 peak hourly passenger car equivalent (PCE) vehicle trips, as summarized in Table XIII-3, during the grading phase.[70] This would represent about 11.0 percent of traffic volumes on Jefferson Boulevard, which carries approximately 3,293 vehicles at Westlawn Avenue in the morning peak hour of traffic.[71] Because workers and vendors will likely use more than one route to travel to and from the Project Site, this conservative assessment of traffic volumes overstates the likely traffic volumes from construction activities at this intersection.

Jefferson Boulevard would serve as part of the haul route for debris and soil exported from the Project Site given its direct access to the San Diego Freeway. Because the Project's construction-related trips would not cause a doubling in traffic volumes (i.e., 100 percent increase) on Jefferson Boulevard, the Project's construction-related traffic would not increase existing noise levels by 3 dBA or more, which is less than the 5 dBA threshold of significance for off-site construction noise activities. Therefore, the Project's noise impacts from construction-related traffic would be less than significant.

[70] This is a conservative, worst-case scenario, as it assumes all workers travel to the worksite at the same time and that vendor and haul trips are made in the same early hour, using the same route as haul trucks to travel to and from the Project Site.

[71] DKA Planning, 2023, based on City of Los Angeles database of traffic volumes on Jefferson Boulevard at Westlawn Avenue, https://navigatela.lacity.org/dot/traffic_data/automatic_counts/JEFFERSON.WESTLAWN.180418.pdf.

Table XIII-3
Construction Vehicle Trips (Maximum Hourly)

Construction Phase	Worker Trips [a]	Vendor Trips	Haul Trips	Total Trips	Percent of Peak A.M. Hour Trips on Jefferson Blvd.[e]
Demolition	13	0	29[b]	41	1.3
Site Preparation	8	0	0	8	0.2
Grading	10	0	352[c]	362	11.0
Trenching	5	0	0	5	0.2
Building Construction	37	40[d]	0	76	2.3
Paving	13	0	0	13	0.4
Architectural Coating	7	0	0	7	0.2

[a] Assumes all worker trips occur in the peak hour of construction activity.
[b] The Project would generate 106 haul trips over a 10-day period with seven-hour work days. Because haul trucks emit more noise than passenger vehicles, a 19.1 passenger car equivalency (PCE) was used to convert noise from haul truck trips to a passenger car equivalent
[c] The Project would generate 2,708 haul trips over a 21-day period with seven-hour work days. Assumes a 19.1 PCE.
[d] This phase would generate about 14.5 vendor truck trips daily over a seven-hour work day. Assumes a blend of vehicle types and a 9.55 PCE.
[e] Percent of existing traffic volumes on Jefferson Boulevard at Westlawn Avenue.

Source: DKA Planning, 2024.

Operation

On-Site Operational Noise

The Project's potential on-site operational noise sources are identified and discussed below.

Mechanical Equipment

The Project would operate mechanical equipment on the roof that would generate incremental long-term noise. HVAC equipment in the form of rooftop units suitable for heating and cooling large volumes of a building would be located on the rooftop, approximately 45 feet above grade. This equipment would include a number of sound sources, including compressors, condenser fans, supply fans, return fans, and exhaust fans that could generate a sound pressure level of up to 81.9 dBA at one foot.[72] However, noise impacts from rooftop mechanical equipment on nearby sensitive receptors would be negligible for several reasons. The presence of the Project's roof edge creates an effective noise barrier that further reduces noise levels from rooftop HVAC units

[72] City of Pomona, Pomona Ranch Plaza WalMart Expansion Project, Table 4.4-5; August 2014. Source was cluster of mechanical rooftop condensers including two Krack MXE-04 four-fan units and one MXE-02 two-fan unit. Reference noise level based on 30 minutes per hour of activity.

by 8 dBA or more.[73] A two-foot high parapet would further shield sensitive receptors near the Project Site. These design elements would be helpful in managing noise, as equipment often operates continuously throughout the day and occasionally during the day, evenings, and weekends. As a result, noise from HVAC units would negligibly elevate ambient noise levels, far less than the 5 dBA CNEL threshold of significance for operational impacts, as identified in the 2006 L.A. CEQA Thresholds Guide. Compliance with LAMC Section 112.02 would further limit the impact of HVAC equipment on noise levels at adjacent properties.

Pad-mounted transformers that power high voltage to standard voltage used to power electronics and lighting would be located on the ground level in an unobstructed location. These transformers are housed in a steel cabinet and generally do not involve noisy equipment.

Otherwise, all other mechanical equipment would be fully enclosed within the structure. This can include mechanical, electrical, and plumbing rooms, a utility fan room, as well as elevator equipment (including hydraulic pump, switches, and controllers) in the subterranean basement. All these activities would generally occur within the envelope of the development, operational noise would be shielded from off-site noise-sensitive receptors.

Auto-Related Activities

The majority of vehicle-related noise impacts at the Project Site would come from vehicles entering and exiting the development from the existing driveway off Jefferson Boulevard. The Project would result in the net total of approximately 101 daily trips.[74] Parking lot noise would include tire friction as vehicles navigate to and from parking spaces, doors slamming, car alarms, and minor engine acceleration. Most of these sources are instantaneous (e.g., car alarm chirp, door slam) while others may last a few seconds.

The Project's auto-related activities on-site would not have a significant impact on the surrounding noise environment. First, the average of up to one vehicle entering or exit per minute during the peak hour would marginally elevate noise levels from the Project Site. Second, the 120-foot distance to the closest receptors would substantially attenuate noise from auto activity. Third, the high ambient noise levels (65.8 dBA CNEL) at nearest sensitive receptors across Jefferson Boulevard would be render any noise from the Project Site's auto activity as inaudible. As a result, auto-related activity on-site would not elevate ambient noise levels by 5 dBA CNEL at nearby sensitive receptors.

Outdoor Uses

While most activities associated with the storage and retail operations would be conducted inside the development, outdoor activities could generate noise that could impact local sensitive

[73] Ibid.

[74] Raju Associates, Technical Memorandum: Public Storage Expansion Project – 12681 W. Jefferson Boulevard, January 2024 (included in Appendix G-1 of this IS/MND).

receptors. This would include loading activities, trash collection, and landscape maintenance, which are discussed below:

- Loading Activities. On-site loading and unloading activities for the mini-warehouse facility would generally occur in one of two ways. Some customers would enter the parking area and load goods onto elevators that would access the loading lobby on the ground floor or storage areas on the upper floors. These loading activities would be contained within the partially enclosed parking spaces on the ground level and the storage facility itself. Others would park in the surface parking spaces, where goods could be moved into the storage facility. Loading activities would generate low levels of noise at these entrances during daytime business hours. As a result, there would be negligible noise impacts on off-site receptors and impacts would not increase CNEL noise levels at off-site locations. Further, LAMC Section 114.03 would regulate loading and unloading activities between 10:00 P.M. and 7:00 A.M.

- Trash collection. On-site trash and recyclable materials would be managed from the waste collection area on the first floor of the facility. Dumpsters would be moved to the street manually or with container handler trucks that use hydraulic-powered lifts that use beeping alerts during operation. Haul trucks would access solid waste from Jefferson Boulevard, where solid waste activities would include use of trash compactors and hydraulics associated with the refuse trucks themselves. Noise levels of approximately 71 dBA L_{eq} and 66 dBA L_{eq} could be generated by collection trucks and trash compactors, respectively, at 50 feet of distance.[75] Because CNEL levels represent the energy average of sound levels during a 24-hour period, the modest sound power from a few minutes of trash collection activities during daytime hours would negligibly affect CNEL sound levels.

- Landscape maintenance. Noise from gas-powered leaf blowers, lawnmowers, and other landscape equipment can generate substantial bursts of noise during regular maintenance. For example, two gas powered leaf blowers with two-stroke engines and a hose vacuum can generate an average of 85.5 dBA L_{eq} and cause nuisance or potential noise impacts for nearby receptors.[76] The landscape plan focuses on a modest palette of accent trees and planters at the ground level that will minimize the need for powered landscaping equipment, as some of this can be managed by hand. Because CNEL levels represent the energy average of sound levels during a 24-hour period, the modest sound power from a few minutes of maintenance activities during daytime hours would negligibly affect CNEL sound levels.

As discussed above, the Project would not result in an exposure of persons to or a generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. The Project would also not increase surrounding noise levels by more than 5 dBA CNEL, the minimum threshold of significance based on the noise/land

[75] RK Engineering Group, Inc. Wal-Mart/Sam's Club reference noise level, 2003.

[76] Erica Walker et al, Harvard School of Public Health; Characteristics of Lawn and Garden Equipment Sound; 2017. These equipment generated a range of 74.0-88.5 dBA Leq at 50 feet.

use category of sensitive receptors near the Project Site. As a result, the Project's on-site operational noise impacts would be considered less than significant,

Off-Site Operational Noise

The majority of the Project's operational noise impacts would be off-site from vehicles traveling to and from the Project Site. The Project would result in the net total of approximately 101 daily trips.[77] The majority of vehicle-related noise at the Project Site would come from up to 31 and 57 vehicles entering and exiting the development during the peak A.M. and P.M. hours, respectively.[78] This would represent 0.9 percent of the 3,293 vehicles currently using Jefferson Boulevard at Westlawn Avenue in the A.M. peak hour.[79] Because it takes a doubling of traffic volumes (i.e., 100 percent) to increase ambient noise levels by 3 dBA L_{eq}, the Project's traffic would neither increase ambient noise levels 3 dBA or more into "normally unacceptable" or "clearly unacceptable" noise/land use compatibility categories, nor increase ambient noise levels 5 dBA or more. Twenty-four hour CNEL impacts would similarly be minimal, far below criterion for significant operational noise impacts, which begin at 3 dBA, as identified in the 2006 L.A. CEQA Thresholds Guide. As such, this impact would be considered less than significant.

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

Less Than Significant Impact.

Construction

Vibration (Building Damage) – On-Site Sources

Construction equipment can produce groundborne vibration based on equipment and methods employed. While this spreads through the ground and diminishes in strength with distance, buildings on nearby soil can be affected. This ranges from no perceptible effects at the lowest levels, low rumbling sounds and perceptible vibration at moderate levels, and slight damage at the highest levels. Table XIII-4 summarizes vibratory levels for common construction equipment.

Table XIII-4
Vibration Source Levels for Construction Equipment

Equipment	Approximate PPV at 25 feet (in/sec)
Pile Driver (impact)	0.644
Pile Drive (sonic)	0.170
Clam shovel drop (slurry wall)	0.202

[77] Raju Associates, Technical Memorandum: Public Storage Expansion Project – 12681 W. Jefferson Boulevard, January 2024, included in Appendix G-1 of this IS/MND.

[78] Ibid.

[79] DKA Planning 2023, based on City of Los Angeles database of traffic volumes on Jefferson Boulevard at Westlawn Avenue, https://navigatela.lacity.org/dot/traffic_data/automatic_counts/JEFFERSON.WESTLAWN.180418.pdf.

Hydromill (slurry wall)	0.008
Vibratory Roller	0.210
Hoe Ram	0.089
Large Bulldozer	0.089
Caisson Drilling	0.089
Loaded Truck	0.076
Jackhammer	0.035
Small Bulldozer	0.003
Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018.	

Groundborne vibration would be generated by a number of construction activities at the Project Site. As a result of equipment that could include on-site bulldozer operations or the vibrational equivalent, vibration velocities of up to 0.148 inches per second peak particle velocity (PPV) are projected to occur at the 12777 Jefferson Boulevard building, the nearest structure to the Project Site. This impact is below the 0.5 inches per second PPV threshold from FTA that is considered potentially harmful to Category I structures (as shown in Table XIII-5). More distant receptors would experience even lower levels of groundborne vibration. Other potential construction activities would produce less vibration and have lesser potential impacts on nearby sensitive receptors. Construction of the Project would also comply with California Civil Code Section 832 and LAMC Section 91.3307, and applicable subsections, that govern the protection of adjoining property. As a result, construction-related structural vibration impacts would be considered less than significant.

Table XIII-5
Building Damage Vibration Levels – On-Site Sources

Off-Site Receptor Location	Distance to Project Site (feet)[a]	Vibration Velocity Levels at Off-Site Sensitive Receptors from Construction Equipment (in/sec PPV)					Significance Criterion (PPV)	Potentially Significant Impact?
		Large Bulldozer	Caisson Drilling	Loaded Trucks	Jack-hammer	Small Bulldozer		
FTA Reference Vibration Level (25 Feet)	N/A	0.089	0.089	0.076	0.035	0.003	--	--
12681 Jefferson Blvd.	50	0.045	0.045	0.038	0.018	0.002	0.30[b]	No
12636 Beatrice St.	50	0.045	0.045	0.038	0.018	0.002	0.30[b]	No
12777 Jefferson Blvd.	15	0.148	0.148	0.127	0.058	0.005	0.50[c]	No
12665 Village Lane	130	0.017	0.017	0.015	0.007	0.001	0.30[b]	No

[a] Includes 10-foot buffer for equipment maneuverability
[b] FTA criterion for Category II (engineered concrete and masonry buildings)
[c] FTA criterion for Category I (reinforced-concrete, steel or timber buildings)

Source: DKA Planning, 2024.

Vibration (Building Damage) – Off-Site Sources

Construction of the Project would generate trips from large trucks including haul trucks, concrete mixing trucks, concrete pumping trucks, and vendor delivery trucks. Regarding building damage, based on FTA data, the vibration generated by a typical heavy-duty truck would be approximately 63 VdB (0.006 PPV) at a distance of 50 feet from the truck.[80] According to the FTA "[i]t is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads." Nonetheless, there are buildings along the Project's anticipated haul route(s) on Jefferson Boulevard that are situated away from the right-of-way and would be exposed to groundborne vibration levels of approximately 0.006 PPV. This estimated vibration generated by construction trucks traveling along the anticipated haul route(s) would be well below the most stringent building damage criteria of 0.12 PPV for buildings extremely susceptible to vibration. The Project's potential to damage roadside buildings and structures as the result of groundborne vibration generated by its truck trips would therefore be considered less than significant.

Operation

During operation of the Project, there would be no significant stationary sources of groundborne vibration, such as heavy equipment or industrial operations. Operational groundborne vibration in the Project Site's vicinity would be generated by its related vehicle travel on local roadways. However as previously discussed, road vehicles rarely create vibration levels perceptible to humans unless road surfaces are poorly maintained and have potholes or bumps. As a result, the Project's vibration impacts during operation would be less than significant.

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

Less Than Significant Impact. The Project Site is located within two miles of the Los Angeles International Airport (LAX). However, the Project Site is not located within the Airport Influence Area.[81] People working at the Project Site would not be exposed to air traffic generated noise in excess of existing conditions. Thus, implementation of the Project would not have the potential to exacerbate current environmental conditions as to result in excessive noise for people residing or working in the area of the Project Site, and impacts would be less than significant.

[80] Federal Transit Administration, "Transit Noise and Vibration Impact Assessment," May 2006, Figure 7-3.

[81] Los Angeles County Airport Land Use Commission, Los Angeles County Airport Land Use Plan, December 1, 2004.

Cumulative Impacts

Construction Noise

On-Site Construction Activities

During construction of the Project, there could be other construction activity in the area that contributes to cumulative noise impacts at sensitive receptors. Noise from construction of development projects is localized and can generally affect noise-sensitive uses within 500 feet. As such, noise from two construction sites within 1,000 feet of each other can contribute to cumulative noise impacts for receptors located between. As discussed previously, there are four related projects within 1,000 feet of the Project Site. As illustrated in Table XIII-6, the cumulative noise impacts at the analyzed sensitive receptors would not be considered significant, as they would not exceed 5.0 dBA L_{eq}. These cumulative noise levels at the analyzed sensitive receptors are marginally higher than impacts from the Project alone, as more distant related projects have minimal impact on construction noise levels due to intervening structures that shield noise from more distant construction sites. Therefore, cumulative construction noise impacts would be less than significant.

Table XIII-6
Cumulative Construction Noise Impacts at Off-Site Sensitive Receptors

Receptor	Maximum Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Ambient Noise Level (dBA L_{eq})	Increase (dBA L_{eq})	Potentially Significant?
1. Production Studios – 12615 Beatrice St.	54.3	65.3	65.6	0.3	No
2. Residences – 5535 Westlawn Ave.	51.7	65.3	65.5	0.2	No
3. Residences - 12665 Village Ln.	62.7	67.8	69.0	1.2	No
4. Residences – 12775 Millennium Dr.	49.6	56.2	57.1	0.9	No
5. Residences – 12855 Runway Rd.	50.5	64.5	64.7	0.2	No
Source: DKA Planning, 2024.					

Off-Site Construction Activities

Concurrent construction activities from related projects can contribute to cumulative off-site impacts if haul trucks, vendor trucks, or worker trips for any related project(s) were to utilize the same roadways. Distributing trips to and from each related project construction site substantially reduces the potential that cumulative development could more than double traffic volumes on existing streets, which would be necessary to increase ambient noise levels by 3 dBA. The Project

would contribute noise equivalent of up to 362 peak hourly PCE vehicle trips during the grading phase.[82] This would represent about 11.0 percent of traffic volumes on Jefferson Boulevard, which carries approximately 3,293 vehicles at Westlawn Avenue in the morning peak hour of traffic.[83] The related projects would have to add 2,931 peak hour vehicle trips to double volumes on Jefferson Boulevard.

However, the four related projects within 1,000 feet of the Project Site would not be capable of generating this much truck traffic:

1. Related Project #1 at 12777 Jefferson Boulevard.[84] The scale of this 49,950 square foot office expansion would be slightly more than half of the Project's proposed 84,752 gross square feet of construction. As such, this related project could add the noise equivalent of approximately 100-200 PCE trips onto Jefferson Boulevard in a peak hour.

2. Related Project #2 at 12575 Beatrice Street. The scale of this 250,000 square foot office building would be about three times larger than the Project's proposed 84,752 gross square feet of construction. As such, this related project could add the noise equivalent of up to approximately 1,000 PCE trips onto Jefferson Boulevard in a peak hour.

3. Related Project #3 at 5405 Jandy Place. The scale of this 93,950 square foot office building would be comparable to the Project's proposed 84,752 gross square feet of construction. As such, this related project could add the noise equivalent of approximately 300-400 PCE trips onto Jefferson Boulevard in a peak hour.

4. Related Project #4 at 12555 Jefferson Boulevard. The remodeling of an existing building would not involve grading activities, which often generate the bulk of construction-related vehicle trips, given the number of haul trucks needed to export soil for new development.

Therefore, the four related projects could add the noise equivalent of 1,000 to 2,000 PCE trips onto Jefferson Boulevard, fewer than the 2,931 trips needed to double traffic volumes on Jefferson Boulevard. As such, cumulative noise due to construction truck traffic from the Project and related projects does not have the potential to double traffic volumes on any roadway necessary to elevate traffic noise levels by 3 dBA, let alone the 5 dBA threshold of significance for operational traffic impacts. As such, cumulative noise impacts from off-site construction would be less than significant.

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[82] This is a conservative, worst-case scenario, as it assumes all workers travel to the worksite at the same time and that vendor and haul trips are made in the same early hour, using the same route as haul trucks to travel to and from the Project Site.

[83] DKA Planning, 2023, based on City of Los Angeles database of traffic volumes on Jefferson Boulevard at Westlawn Avenue, https://navigatela.lacity.org/dot/traffic_data/automatic_counts/JEFFERSON.WESTLAWN.180418.pdf.

[84] While this project is on the list of related projects, this project has already been constructed and therefore would not result in the Project to result in any cumulative impacts.

Construction Vibration

Vibration impacts are generally limited to buildings and structures located near a construction site (i.e., within 15 feet as related to building damage). As noted earlier, the Project's potential to damage nearby buildings is less than significant. However, nearby structures could be subject to cumulative vibration impacts if concurrent construction was to occur nearby. However, the closest related project is an office expansion approximately 670 feet from the Project Site (related project #1). Based on the distance of the related projects from the Project Site, there is no potential for a cumulative construction vibration impact that subjects nearby buildings to vibration levels that exceed the FTA's vibration damage criteria or Caltrans criteria for historic buildings.

While haul trucks from any related projects and other concurrent construction projects could generate additional vibration along haul routes, the potential to damage buildings is extremely low. The Project could generate an average of one hourly haul truck trip during the course of construction. The FTA finds that "[i]t is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads." The vibration generated by a typical heavy truck would be approximately 0.00566 in/sec PPV at a distance of 50 feet.

As discussed above, there are existing buildings that are near the right-of-way of the anticipated haul route for the Project (e.g., Jefferson Boulevard). These buildings are anticipated to be exposed to groundborne vibration levels that are far less than the levels recommended by FTA as potential thresholds for building damage. Trucks from any related projects are expected to generate similar groundborne vibration levels. Therefore, the vibration levels generated from off-site construction trucks associated with the Project and other related projects along the anticipated haul route(s) would be below the most stringent building damage threshold of 0.12 PPV for buildings extremely susceptible to vibration. Therefore, potential cumulative vibration impacts with respect to building damage from off-site construction activities would be less than significant.

Operational Noise

The Project Site and Playa Vista neighborhood have been developed with residential and commercial land uses that have previously generated, and will continue to generate, noise from a number of operational noise sources, including mechanical equipment (e.g., HVAC systems), outdoor activity areas, and vehicle travel. The four related projects in the vicinity of the Project Site are commercial and office uses and would also generate stationary-source and mobile-source noise due to ongoing day-to-day operations. These types of uses generally do not involve use of noisy heavy-duty equipment such as compressors, diesel-fueled equipment, or other sources typically associated with excessive noise generation.

Noise from on-site mechanical equipment (e.g., HVAC units) and any other human activities from the related projects would not be typically associated with excessive noise generation that could result in increases of 5 dBA or more in ambient noise levels at sensitive receptors when combined with operational noise from the Project. The presence of intervening multi-story buildings along

Jefferson Boulevard and the neighborhoods that flank it will generally shield noise impacts from one or more projects that may generate operational noise. Therefore, cumulative stationary source noise impacts associated with operation of the Project and related projects would be less than significant.

The Project would add up to 101 daily vehicle trips to the local roadway network on a peak weekday at the start of operations in 2028, including up to 57 maximum hourly vehicle trips.[85] The four related projects within 1,000 feet of the Project Site are projected to generate about 907 additional vehicle trips in the P.M. peak hour.[86] When combined with the Project, these five developments would add up to 964 maximum hourly vehicle trips onto local roadways, which would represent approximately 29.3 percent of vehicles currently using Jefferson Boulevard at Westlawn Avenue in the P.M. peak hour. Therefore, cumulative noise impacts due to off-site traffic would not increase ambient noise levels by 3 dBA to or within their respective "Normally Unacceptable" or "Clearly Unacceptable" noise categories, or by 5 dBA or greater overall. Additionally, the Project would not result in an exposure of persons to or a generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Therefore, cumulative mobile source noise impacts associated with operation of the Project and related projects would be less than significant.

Operational Vibration

The Project Site and surrounding Jefferson Boulevard corridor have been developed with commercial, residential, and other uses that will continue to generate minimal groundborne vibration. During operation, vibration impacts are generally limited to buildings and structures located near the construction site (i.e., within 15 feet as related to building damage). In general, related projects in this corridor would be commercial or office land uses that do not operate impact equipment and operations and would not generate substantial vibration. As a result, operation of new cumulative development in the area would have no potential to exceed FTA vibration damage standards at off-site receptors.

Like the Project, any concurrent development near the Project Site would contribute normal passenger vehicle traffic that would generate negligible changes to roadway vibration. Use of larger heavy-duty trucks for delivery of goods and materials would be intermittent and not result in significant, cumulative increases in groundborne vibration on Jefferson Boulevard and other local roadways. Therefore, potential cumulative vibration impacts with respect to building damage from off-site operations would be less than significant.

[85] Raju Associates, Technical Memorandum: Public Storage Expansion Project – 12681 W. Jefferson Boulevard, January 2024, included in Appendix G-1 of this IS/MND.

[86] City of Los Angeles, Related Projects Summary from Case Logging and Tracking System, November 2022.

XIV. POPULATION AND HOUSING

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

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

Less Than Significant Impact. A significant impact may occur if a project would locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing population growth that would otherwise not have occurred as rapidly or in as great a magnitude.

Construction

The construction activities associated with the Project would create temporary construction-related jobs. Nevertheless, the work requirements of most construction activities are highly specialized, so that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, construction workers would not be anticipated to relocate their residence to the Project Site area and would not induce unplanned population growth and/or require permanent housing. Therefore, the Project's indirect unplanned population growth impacts associated with construction activities would be less than significant.

Operation

The proposed uses would generate up to 9 employment positions at the Project Site. Based on the nature of the Project, it is likely that the employees who would work at the Project would already reside in the surrounding area, and it is not anticipated that people would move to the area to work at the Project Site. The Project does not propose residential uses. Thus, employment

associated with the Project would not induce substantial unplanned population growth in the City, and this impact would be less than significant.

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

No Impact. A significant impact may occur if a project would result in the displacement of a substantial number of existing housing units or residents, necessitating the construction of replacement housing elsewhere. The Project Site is currently developed with mini warehouse uses and associated parking, and no residential housing units exist on the Project Site or would be demolished as part of the Project. The Project would not displace any housing or residents, as there is no housing on the Project Site. Therefore, no impact would occur.

Cumulative Impacts

As discussed previously, the Project would provide employment positions that would likely be accommodated by people who already reside in the surrounding area, and the Project would not result in unplanned growth. The four related projects are all involve office uses. While it's possible some employees of the related projects would relocate to the Project area, many employees would likely already reside in the surrounding area, and would not result in unplanned growth. Thus, cumulative impacts related to population and housing would be less than significant.

XV. PUBLIC SERVICES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Fire protection?	☐	☐	☒	☐
b. Police protection?	☐	☐	☒	☐
c. Schools?	☐	☐	☒	☐
d. Parks?	☐	☐	☒	☐
e. Other public facilities?	☐	☐	☒	☐

a. Fire protection?

Less Than Significant Impact. A significant impact may occur if, as a result of LAFD not being able to adequately serve the Project with existing governmental facilities, there would be a need for a new or physically altered fire station to be constructed which would cause significant environmental impacts.[87] The need for, or deficiency in, adequate fire protection services as a result of the Project is not in and of itself is a potentially significant impact, but rather a social and/or economic impact for which CEQA does not require further analysis.[88] The ultimate determination of whether there is a significant impact to the environment related to fire protection from a project is determined by whether construction of new or expanded fire protection is a direct physical change or a reasonably foreseeable indirect change in the environment caused by the Project. To the extent the Project would result in a need for new or expanded fire facilities, based on existing zoning standards, past practices, and historical development of City fire facilities, the City makes the following assumptions: such facilities (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size; and (3) would qualify for a categorical exemption under CEQA Guidelines Section 15301 or 15332 and/or a Mitigated Negative Declaration.

[87] City of Hayward v. Board of Trustees of California State University (2015) 242 Cal.App.4th 833, 847.

[88] City of Hayward v. Board of Trustees of California State University (2015) 242 Cal.App.4th 833, 847.

Construction

Construction and demolition activities associated with the Project could temporarily increase demand for fire protection. Such activities may also cause the occasional exposure of combustible materials, such as wood, plastics, sawdust, coverings and coatings, to heat sources from machinery and equipment sparking, exposed electrical lines, welding activities, and chemical reactions in combustible materials and coatings. Project construction activities would comply with all applicable federal, state, and City regulations related to fire safety, including federal regulations under the Occupational Safety and Health Acts (29 Code of Federal Regulations, Part 1926 Subpart F), the California Building Code (California Code of Regulations, Title 24), and the City's Fire Code (LAMC Chapter V, Article 7). To comply with California Department of Industrial Relations, Division of Occupational Safety and Health (Cal-OSHA) and Fire and Building Code requirements, construction managers and personnel will have training in fire prevention and emergency response, and fire suppression equipment specific to construction would be maintained on-site.[89] Project demolition and construction activities would comply with all applicable codes and ordinances related to the maintenance of mechanical equipment, handling and storage of flammable materials, and cleanup of spills of flammable materials. Construction is a regular activity in Los Angeles and, as demonstrated by past practice, the LAFD is equipped and prepared to deal with construction-related fire impacts should they occur, and no aspect of this Project raises the potential for unusual fire risks during construction to which the LAFD would be unable to respond.

Project construction could also potentially impact the provision of existing LAFD services to and within the vicinity of the Project Site as a result of construction impacts to the surrounding roadways. However, construction activity would be contained on-site (except as may be required for improvements to the adjacent sidewalks and off-site utility connections) and travel lanes would be maintained in each direction on all public streets around the Project Site throughout the construction period, and emergency access would not be impeded. Further, the Project would be required to implement a Construction Traffic Management Plan, which would include traffic management strategies, and ensure that adequate and safe access for LAFD remains available within and near the Project Site during construction.

Construction activities would also generate traffic associated with the movement of construction equipment, the hauling of construction materials to and from the Project Site, and construction worker traffic. Thus, although construction activities would be short-term and temporary for the area, Project construction activities could temporarily impact emergency access and response times. However, a Construction Traffic Management Plan would be implemented to minimize disruptions to through traffic flow and maintain emergency vehicle access to the Project Site and neighboring land uses. The majority of construction-related traffic, including deliveries, hauling activities, and construction worker trips, would occur outside the typical weekday commuter AM and PM peak periods, thereby reducing the potential for traffic-related conflicts and the slowing

[89] Cal. Code of Regs., tit. 8, § 1920.

of emergency response times. In addition, temporary traffic controls would be implemented to improve traffic flow around the Project Site during the construction period, and construction activity would be contained on-site (except as may be required for improvements to the adjacent sidewalks and off-site utility connections).

Furthermore, Section 21055 of the California Vehicle Code (CVC) exempts drivers of authorized emergency vehicles from adherence to the rules of the road, and Section 21806 of the CVC requires drivers to yield to emergency vehicles. Finally, construction is a temporary condition which would not itself require the construction of specific new governmental facilities to maintain adequate fire protection services.

The Project is similar to other construction projects, uses standard materials and construction practices similar to such projects, and as a result, LAFD possesses sufficient equipment, knowledge, and resources to addresses any concerns related to fire protection from the Project. Furthermore, as discussed above, the Project would comply with relevant regulations for workplace safety, best management practices for material use and storage, and ensuring emergency access to the site.

Based on the above, construction of the Project would not result in substantial adverse physical impacts associated with the provision of, or need for, new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives related to fire protection. Therefore, impacts to fire protection during Project construction would be less than significant.

Operation

The Project's proposed uses would be similar to other uses in the Project vicinity. The types of fires that could potentially occur within the Project Site would be adequately suppressed with the fire equipment found at the fire station nearest to the Project Site, which is LAFD Station No. 67, located at 5451 Playa Vista Drive, approximately 0.75 miles from the Project Site. Compliance with applicable regulatory requirements, including LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, would ensure that adequate fire prevention features that would reduce the demand on LAFD facilities and equipment resulting from the Project are implemented during Project operation. As such, compliance with Fire Code requirements would minimize the potential for incidents requiring an emergency response by LAFD and therefore reduce the need for a new fire station, or the expansion, consolidation, or relocation of an existing fire station.

The factors that the LAFD considers in determining whether fire protection services for a project are adequate include whether the project: (1) is within the maximum response distance for the land uses proposed; (2) complies with emergency access requirements; (3) complies with fire-flow requirements; and (4) complies with fire hydrant placement.

Pursuant to LAMC Section 57.09.07, the maximum response distance between a commercial/industrial use is 1 mile for an engine company and 1.5 miles for a truck company. If this maximum distance is exceeded, all structures shall be constructed with automatic fire sprinkler systems. LAFD Station No. 67, located at 5451 Playa Vista Drive, which is approximately 0.75 miles from the Project Site, would serve the Project Site. Station No. 67 is equipped with a truck company and an engine company. Therefore, as this station is within the required response distance of the Project Site, automated fire sprinklers would not be required. Nevertheless, the Project would include fire sprinklers.

Emergency vehicle access to the Project Site would continue to be provided from local and major roadways (i.e., Jefferson Boulevard and Centinela Avenue) and would be maintained at all times during both Project construction and operation. All ingress/egress associated with the Project would be designed and constructed in conformance to all applicable City Department of Building and Safety and LAFD standards and requirements for design and construction.

Final fire-flow demands, fire hydrant placement, and other fire protection equipment would be determined for the Project during LAFD's plan check building permit process. Furthermore, significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area of a project resulting from the construction or alteration of fire facilities, and the obligation to provide adequate fire protection is the responsibility of the City. The City meets this constitutional requirement by preparing for long-term growth and demographic changes. The City along with LAFD continue to monitor the demand for existing and projected fire facilities (refer to Objective 9.16 of the Framework Element and Policy 2.1.6 of the Safety Element, and coordinate the development of new fire facilities to be phased with growth (Objective 9.18 of the Framework Element). LAFD continues to improve and provide for adequate fire protection services, and the Project would not trigger any requirements which would necessitate the need for additional or expanded fire protection facilities. Based on this analysis, it is reasonable to conclude that Project operation would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility in order to maintain service; such services will be provided by a local jurisdiction, and would not inhibit LAFD emergency response.

In conclusion, as described above, the Project would not result in substantial adverse physical impacts associated with the provision of, or need for, new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives related to fire protection. Consistent with the ruling of *City of Hayward v. Board Trustees of California State* University (2015) 242 Cal.App.4th 833 and the requirements stated in the California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate fire protection and emergency medical services is the responsibility of the City. Through the City's regular budgeting efforts, LAFD's resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses and possibly station expansions or new station construction, would be identified and allocated according to the priorities at the time. If LAFD determines that new facilities are necessary at some point in the future, further analysis, including a specific location,

would be speculative and beyond the scope of this document. Thus, the Project impacts on fire protection would be less than significant.

Cumulative Impacts

Implementation of the Project and the related projects would result in a net increase in the number of employees in the Project area and could further increase the demand for fire protection services. Cumulative development requires the LAFD to continually evaluate the need for new or physically altered facilities in order to maintain adequate service ratios. Similar to the Project, the related projects would be subject to the Fire Code and other applicable regulations of the LAMC including, but not limited to, automatic fire sprinkler systems for high-rise buildings and/or projects located farther than 1.5 miles from the nearest LAFD Engine or Truck Company to compensate for additional response time, and other recommendations made by the LAFD to ensure fire protection safety. Through the process of regulatory compliance, the ability of the LAFD to provide adequate facilities to accommodate future growth and maintain acceptable levels of service would be ensured. Furthermore, the increased demands for additional LAFD staffing, equipment, and facilities would be funded via existing mechanisms (e.g., property taxes and government funding) to which the Project and the related projects would contribute. Therefore, cumulative impacts related to fire protection services would be less than significant.

b. Police protection?

Less Than Significant Impact. A significant impact may occur if a project creates the need for new or physically altered police facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives.[90] The need for, or deficiency in, adequate police protection services as a result of the Project is not in and of itself is a potentially significant impact, but rather a social and/or economic impact for which CEQA does not require further analysis.[91] The ultimate determination of whether there is a significant impact to the environment related to police protection from a project is determined by whether construction of new or expanded police protection is a direct physical change or a reasonably foreseeable indirect change in the environment caused by the Project. To the extent the Project would result in a need for new or expanded police facilities, based on existing zoning standards, past practices, and historical development of City police facilities, the City makes the following assumptions: such facilities (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size; and (3) would qualify for a categorical exemption under CEQA Guidelines Section 15301 or 15332 and/or a Mitigated Negative Declaration.

[90] City of Hayward v. Board of Trustees of California State University (2015) 242 Cal.App.4th 833, 847.

[91] City of Hayward v. Board of Trustees of California State University (2015) 242 Cal.App.4th 833, 847.

Construction and operation of new uses can result in additional calls for service from the Los Angeles Police Department (LAPD). The Project includes proposed construction methods and building uses currently widespread in the City of Los Angeles, which LAPD has sufficient specialized equipment and training with which to respond. LAPD dispatches resources dynamically, with officers responding from the field, patrols, or facilities depending on their location at the time. Due to the nature of dispatching police calls for service, facilities are not the limiting factor in responding to calls for service, but rather equipment and staffing as police are infrequently in one location for extended periods of time. LAPD continually evaluates their equipment and staff levels, making adjustments as necessary, with a focus towards advanced technology, operational efficiencies, community involvement, and advanced training to maximize current resources community involvement. Due to the unpredictable nature of deploying resources, developments such as advanced equipment in vehicles, improved access to digital resources in vehicles, and advanced mobile phone capabilities all allow for a more mobile and dynamically deployed workforce. These advances, such as in car computers, mobile phone advancements, mapping and navigation improvements, and dispatch center advancements allow for resources to be deployed from the field rather than a static office or station. The Project would not introduce physical obstructions, inhibiting the LAPD, nor would the uses contain novel activities that would require new police facilities to adequately ensure public safety. The Project would also comply with relevant laws, as well as industry standards in securing the property during both construction and operation. The Project would include security measures during operation, such as secured access, closed circuit video surveillance, security alarm systems, and ample lighting. The Project would expand the mini-warehouse uses that already exist on the Project Site and would not constitute a novel arrangement of uses or use type which would require the construction of altered or new specialized facilities.

The Project Site is served by the City of Los Angeles Police Department's (LAPD) West Bureau, which oversees LAPD operations in the Del Rey, Manchester Square, Mar Vista, Oakwood, Palms, Playa del Rey, Playa Vista, Venice, and Westchester areas.[92] The Pacific Community Police Station, located at 12312 Culver Boulevard, is approximately 1.4 miles driving distance from the Project Site. The West Bureau service area is 124 square miles in size has approximately 840,400 residents.[93] New staffing for the LAPD is subject to approval by the City Council and is based on a complex set of socio-economic factors, which are outside the purview of CEQA. Changes in LAPD staffing levels do not typically result in substantial adverse physical impacts on the environment. The Project would not introduce population to an area not served by a police station or an area otherwise not currently served by existing police services, and therefore the Project would not require new facilities or staffing requiring dedicated facilities.

Furthermore, the protection of the public safety is the responsibility of local government where local officials have an obligation to give priority to the provision of adequate public safety services.

[92] LAPD, West Bureau: https://www.lapdonline.org/lapd-contact/west-bureau/

[93] LAPD: https://www.lapdonline.org/lapd-contact/west-bureau/, accessed February 23, 2024

Based on this analysis, it is reasonable to conclude that Project operation would not require the addition of a new police station or the expansion, consolidation, or relocation of an existing facility in order to maintain service; such services will be provided by a local jurisdiction, and would not inhibit LAPD emergency response. In conclusion, as described above, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for police protection. Additionally, the Project would also contribute to the General Fund, a portion of which is allocated to the LAPD and other public services. Moreover, consistent with *City of Hayward v. Trustees of California State University* (2015) 242 Cal.App.4th 833, significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area of a project, and potential impacts on public safety services are not an environmental impact that CEQA requires a project applicant to mitigate. Therefore, Project impacts related to police protection services would be less than significant.

Cumulative Impacts

Implementation of the Project and the related projects would result in a net increase in the number of employees in the area of the Project Site and could further increase the demand for police protection services. Cumulative development requires the LAPD to continually evaluate the need for new or physically altered facilities in order to maintain adequate service ratios. Similar to the Project, the related projects would be subject to the site plan review and approval requirements, recommendations of the LAPD related to crime prevention features, and other applicable regulations of the LAMC. Through the process of compliance, the ability of the LAPD to provide adequate facilities to accommodate future growth and maintain acceptable levels of service would be ensured. Furthermore, the increased demands for additional LAPD staffing, equipment, and facilities would be funded via existing mechanisms (e.g., property taxes and government funding) to which the Project and the related projects would contribute. Therefore, cumulative impacts related to police protection services would be less than significant.

c. Schools?

Less Than Significant Impact. The Project would include retail and mini-warehouse uses, which would not result in a direct demand for school services. Additionally, pursuant to the California Government Code Section 65995, the Project Applicant would be required to pay school fees established by the Los Angeles Unified School District (LAUSD), payment of which in accordance with existing rules and regulations regarding the calculation and payment of such fees would, by law, provide full and complete mitigation for any potential direct and indirect impacts to schools as a result of the Project. Therefore, Project impacts to school services would be less than significant.

Cumulative Impacts

Like the Project, the related projects include commercial uses that would not result in any direct demand for school services. However, similar to the Project, the applicants of the related projects would be required to pay the applicable school fees to the LAUSD to ensure that no significant impacts to school services would occur. Therefore, cumulative impacts to school services would be less than significant.

d. Parks?

Less Than Significant Impact. A significant impact to parks would occur if implementation of a project includes a new or physically altered park or creates the need for a new or physically altered park, the construction of which could cause substantial adverse physical impacts. The Project includes retail and mini-warehouse uses. Employees generated by the proposed uses would not typically enjoy long periods of time during the workday to visit parks, and they would be more likely to use parks near their homes during non-work hours. In addition, the demand for parks and recreational facilities in the City is generally determined based on the number of residents a project would generate and the City's parkland acreage-to-population ratios are based on residential population and not employee population. The Project includes commercial and mini warehouse uses, which would not generate a residential population that would result in additional demand for parks and recreational facilities, and this impact would be less than significant.

Cumulative Impacts

Like the Project, the related projects are commercial uses that would not result in any direct demand for parks and recreational facilities, as they would not generate a residential population that would result in additional demand for parks and recreational facilities. Therefore, cumulative impacts to parks and recreational facilities would be less than significant.

e. Other public facilities?

Less Than Significant Impact. The Project includes mini-warehouse and retail uses. Employees generated by the proposed uses would not typically enjoy long periods of time during the workday to visit libraries, and they would be more likely to use libraries near their homes during non-work hours. In addition, it is likely that Project employees would have individual access to internet service, which provides information and research capabilities that studies have shown to reduce demand at physical library locations.[94],[95] As the Project includes commercial and mini warehouse

[94] "To Read or Not To Read", see pg. 10: "Literary reading declined significantly in a period of rising Internet use": http://www.nea.gov/research/toread.pdf.

[95] "How and Why Are Libraries Changing?" Denise A. Troll, Distinguished Fellow, Digital Library Federation: http://old.diglib.org/use/whitepaper.htm.

uses, it would not result in additional demand for library facilities, and this impact would be less than significant.

Cumulative Impacts

Similar to the Project, the related projects include commercial uses that would not result in any direct demand for libraries, as they would not generate a residential population that would result in additional demand for library facilities. Therefore, cumulative impacts to library facilities would be less than significant.

XVI. RECREATION

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

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

Less Than Significant Impact. As discussed in response to Checklist Question XV(d) (Public Services – Parks), the Project includes commercial and mini warehouse uses, which would not generate a residential population that would result in additional demand for parks and recreational facilities, and therefore, this impact would be less than significant.

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

No Impact. A significant impact may occur if a project includes the construction or expansion of park facilities, the construction of which could have a significant adverse effect on the environment. The Project does not include any recreational facilities. Further, as the Project would not result in additional demand for parks and recreational facilities, the Project would not require the construction or expansion of recreational facilities, and no impact would occur.

Cumulative Impacts

Refer to discussion of cumulative impacts related to parks and recreational facilities under response to Checklist Question XV(d) (Public Services – Parks). As discussed therein, cumulative impacts related to parks and recreational facilities would be less than significant.

XVII. TRANSPORTATION

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

This section is based on the following items, which are included as Appendix G-1 and G-2 of this IS/MND:

G-1 Transportation Technical Memorandum, Raju Associates, Inc., January 31, 2024.

G-2 Transportation Assessment Letter, Los Angeles Department of Transportation, February 13, 2024.

a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Less Than Significant Impact. The Project would not conflict with the relevant City plans, policies, and programs and does not include any features that would preclude the City from completing and complying with these guiding documents and policy objectives. The Project will not conflict with any plans or policies that govern the public right-of-way, such as the Los Angeles Department of Transportation's (LADOT) Manual of Policy and Procedures (MPP) Section 321, Driveway Design, Mobility Plan 2035, and the Citywide Design Guidelines – Guideline 2. The Project is consistent with the GHG reduction targets forecasted in the SCAG RTP/SCS. Additionally, the Project is consistent with the transportation-related elements of the Plan for a Healthy Los Angeles (Healthy LA), Vision Zero, the Mobility Hubs Reader's Guide, the City's Walkability Checklist, Mobility Plan 2035, and the Palms – Mar Vista – Del Rey Community Plan. Furthermore, as stated below, the Project is consistent with the City's VMT goals.

The Project would provide the roadway required dedication to meet the City's street design policies as expressed in the Mobility Element of the General Plan (Mobility Plan 2035) and would

not conflict with the Mobility Plan 2035. The Project is consistent with polices in the Mobility Plan 2035, including the following:

- **Mobility Plan 2035 Policy 2.1** – Adaptive Reuse of Streets. Design, plan, and operate streets to serve multiple purposes and provide flexibility in design to adapt to future demands.

- **Mobility Plan 2035 Policy 2.3** – Pedestrian Infrastructure. Recognize walking as a component of every trip, and ensure high quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.

- **Mobility Plan 2035 Policy 3.2** – People with Disabilities. Accommodate the needs of people with disabilities when modifying or installing infrastructure in the public right-of-way.

- **Mobility Plan 2035 Policy 2.10** – Loading Areas. Facilitate the provision of adequate on and off-site street loading areas.

- **Mobility Plan 2035 Program PL.1** – Driveway Access. Require driveway access to buildings from non-arterial streets or alleys (where feasible) in order to minimize interference with pedestrian access and vehicular movement.

The Project's consistency with these policies ensures no conflict with the Mobility Plan.

Therefore, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities, and the impact would therefore be less than significant.

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

Less Than Significant Impact. This question was revised to address consistency with CEQA Guidelines Section 15064.3, subdivision (b), which relates to use of vehicle miles traveled (VMT) as the methodology for evaluating traffic impacts. The Los Angeles Department of City Planning (LADCP) and LADOT updated the Transportation Section of the City's CEQA Thresholds Guide to comply with and implement Senate Bill 743 (SB 743).

On September 27, 2013, Governor Brown signed SB 743. Under SB 743, the focus of transportation analysis pursuant to CEQA shifts from driver delay, or Level of Service (LOS), to reduction in VMT, reduction in GHG emissions, creation of multimodal networks, and promotion of mixed-use developments. In December 2018, the California Natural Resources Agency certified and adopted amendments to the CEQA Guidelines implementing SB 743 with a target implementation date of July 1, 2020. City staff presented the CEQA Appendix G environmental checklist update to the City Council, which led to the adoption of new VMT-based significance

thresholds and its subsequent incorporation into the City's CEQA Threshold Guide. In the course of this update, LADOT has developed a VMT Calculator tool to "screen" projects to determine if a VMT analysis is required, and if so, then to estimate project specific daily household VMT per capita and daily work VMT per employee for land use development projects. This tool is intended to be used for the development projects within the City, and the VMT methodology is tailored to the Transportation Assessment Guidelines (TAG).

A copy of the completed VMT screening analysis worksheets are contained in Appendix G-1 of this IS/MND. As shown therein, the Project is estimated to result in a net total of approximately 101 daily trips. Based on the results using the City's VMT Calculator, a formal VMT assessment is not required to be performed because the forecast of net new daily vehicle trips does not exceed the daily trip threshold of 250 net new daily vehicle trips established as the screening criteria in the TAG. Accordingly, the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b), and the Project's transportation impacts related to VMT would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project were to include a new roadway design, introduce a new land use or project features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if project access or other features were designed in such a way as to create hazardous conditions.

Construction

During construction, the Project would not substantially increase hazards due to a geometric design feature, and vehicular access would be maintained via the existing driveway on Jefferson Boulevard. LADOT generally considers construction-related traffic to cause adverse but not significant impacts because, while sometimes inconvenient, construction-related traffic effects are temporary. LADOT requires implementation of worksite traffic control plans to ensure that any construction-related effects are minimized to the greatest extent possible. Compliance with LADOT's requirement for a worksite traffic control plan would ensure that impacts are less than significant.

Operation

The Project would not substantially increase hazards due to a geometric design feature. Vehicular access to the Project Site would continue to be provided via the existing driveway on Jefferson Boulevard. The Project will not add or shift any driveways. The Project Site driveway meets the standards set forth by LADOT and the Bureau of Engineering (BOE), and therefore, this impact would be less than significant.

d. Result in inadequate emergency access?

Less Than Significant Impact. This threshold reviews whether or not a project's elements would have a detrimental effect on emergency vehicle response times. Emergency vehicular access to the Project Site would be maintained from the existing driveway on Jefferson Boulevard, and the Project's driveway and internal circulation would meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access both during construction as well as after completion of the Project. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, 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 set forth in Section 57.118 of the LAMC, and which are required prior to the issuance of a building permit. The Project also would not include the installation of barriers that could impede emergency vehicle access both during and operation. Drivers of emergency vehicles are also trained to utilize center turn lanes, or travel in opposing through lanes (on two-way streets) to pass through crowded intersections or streets. Accordingly, the respect entitled to emergency vehicles and driver training allows emergency vehicles to negotiate typical street conditions in urban areas. As such, emergency access to the Project Site and surrounding area would be maintained both during Project construction and operation. Therefore, the Project would not result in inadequate emergency access during construction or operation, and, as such, impacts to emergency access during construction and operation of the Project would be less than significant.

Cumulative Impacts

As with the Project, the related projects will be reviewed for consistency with the local plans, programs, ordinances, and policies that address the circulation system. If a project is found to be inconsistent with any of the local programs, plans, ordinances, and polices that address the circulation system, the project would be required to implement changes or mitigation measures to achieve consistency. Accordingly, there would be no significant cumulative impacts to which the Project, as well as other nearby related projects contribute to regarding transportation policies or standards adopted to protect the environment and support multimodal transportation options and a reduction in VMT. In addition, since the Project does not include any features that would preclude the City from complying with these guiding documents and policy objectives, there is no cumulative inconsistency that can be determined. Therefore, cumulative impacts related to plan consistency would be less than significant.

As described above, a formal VMT assessment is not required to be performed for the Project because the forecast of net new daily vehicle trips does not exceed the daily trip threshold of 250 net new daily vehicle trips established as the screening criteria in the TAG, and the Project's transportation impacts related to VMT were determined to be less than significant. As identified in the TAG, development projects that do not exhibit significant VMT impacts are considered to align with the long-term VMT and greenhouse gas reduction goals of both the City and regional

SCAG transportation plans. Therefore, since the Project itself does not result in VMT impacts, it is also deemed to have a less than significant cumulative VMT impact.

Pursuant to the TAG, the potential for cumulative impacts related to hazardous design features should be determined by reviewing project site access plans for cumulative development projects with access points proposed along the same block(s) as a proposed project. None of the related projects are located on the same block as the Project. Therefore, there would be no cumulative impacts related to substantially increasing hazards due to geometric design features or incompatible uses, and this impact would be less than significant.

Finally, similar to the Project, all ingress/egress and access associated with the related projects would be designed and constructed in conformance to all applicable requirements, including the City Building Code, City Fire Code, LAMC, and other LAFD standards and requirements for design and construction. As all projects, including the Project and the related projects, would be required to comply with existing regulations related to access, cumulative impacts with respect to emergency access would be less than significant.

XVIII. TRIBAL CULTURAL RESOURCES

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

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

The analysis in this section is based in part on the following, which is included in Appendix C of this IS/MND:

C Cultural Resources Inventory, PaleoWest Archaeology, March 7, 2019.

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

No Impact. As discussed above, the existing building on the Project Site is not currently listed in the National Register of Historic Places, the California Register of Historical Resources, or as a City of Los Angeles Historic-Cultural Monument. In addition, the existing building was not identified by SurveyLA as appearing eligible to be designated as a historic resource or otherwise requiring further historic preservation review. Therefore, the existing building would not be

considered a tribal cultural resource as defined in Public Resources Code Section 21074, and no impact would occur.

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

Less Than Significant with Mitigation Incorporated. Approved by Governor Brown on September 25, 2014, Assembly Bill 52 (AB 52) establishes a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources (TCRs), as defined in Public Resources Code Section 21074, as part of CEQA. Effective July 1, 2015, AB 52 applies to projects that file a Notice of Preparation of an MND or EIR on or after July 1, 2015. PRC Section 21084.2 now establishes that a project with an effect that may cause a substantial adverse change in the significance of a TCR is a project that may have a significant effect on the environment. To help determine whether a project may have such an effect, PRC Section 21080.3.1 requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project. That consultation must take place prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a project. As a result of AB 52, the following must take place: 1) prescribed notification and response timelines; 2) consultation on alternatives, resource identification, significance determinations, impact evaluation, and mitigation measures; and 3) documentation of all consultation efforts to support CEQA findings for the administrative record.

The Project has complied with all required notification and consultation under AB 52. Under AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation.

On April 9, 2024, the City mailed notices to the following contacts listed on the City's AB 52 Native American Heritage Commission Tribal Consultation List:

1. Fernandeño Tataviam Band of Mission Indians
2. Gabrieleño Band of Mission Indians – Kizh Nation
3. Gabrielino/Tongva San Gabriel Band of Mission Indians
4. Gabrielino Tongva Indians of California Tribal Council
5. Gabrielino/Tongva Nation
6. Gabrielino-Tongva Tribe
7. San Fernando Band of Mission Indians
8. Soboba Band of Luiseño Indians
9. Torres Martinez Desert Cahuilla Indians

The notice provided a 30-day period in which any of the tribal contacts could request consultation with the City concerning tribal cultural resources that may be impacted by the Project. On May 10, 2024, the City received one request for Native American tribal consultation from Andrew Salas, Chairman of the Gabrieleño Band of Mission Indians – Kizh Nation (Tribe). On May 17, 2024, the City and Tribe officially began the consultation process, which continued until October 2, 2024, when the City sent an email documenting completion of consultation.

According to the cultural resources inventory included in Appendix C of this IS/MND, there are no known archaeological sites or built-environment resources on the Project Site or within a quarter-mile radius, and the Project Site is located within an urbanized area that has been subject to grading and development in the past. However, a record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed for the Project Site to determine whether the NAHC has any knowledge of Native American cultural resources within the immediate vicinity of the Project area. The NAHC responded with positive results, which indicate the possible presence of a cultural resource of significance to a California Native American tribe. (See Appendix C of this IS/MND for results of the SLF search.)

Based on the results of tribal consultation and the SLF search, the Project would implement Mitigation Measure MM-TRIBAL-1, provided below, regarding the discovery and handling of any potential resources. With implementation of MM-TRIBAL-1, impacts with respect to tribal cultural resources would be less than significant.

Mitigation Measure

MM-TRIBAL-1 **Monitor Retention.** Prior to commencing any Ground Disturbance Activities (as defined below) at the Project site, the Applicant, or its successor, shall retain a qualified tribal monitor from and approved by the Gabrieleno Band of Mission Indians – Kizh Nation (Tribe). Ground Disturbance Activities shall include excavating, digging, trenching, grading, or a similar activity at the Project site (i.e., both on-site and any off-site locations that are included in the Project description/definition and/or required in connection with the Project, such as public improvement work). The Applicant, or its successor, and the tribal monitor shall execute a monitoring agreement prior to the earlier of the

commencement of any Ground Disturbance Activities, or the issuance of any permit necessary to commence a Ground Disturbance Activity.

WEAP. Prior to commencing any Ground Disturbance Activities, the tribal monitor shall provide Worker Environmental Awareness Program (WEAP) training to construction crews involved in Ground Disturbance Activities that includes information on regulatory requirements for the protection of tribal cultural resources. As part of the WEAP training, construction crews shall be briefed on proper procedures to follow should a crew member discover tribal cultural resources during Ground Disturbance Activities. In addition, workers will be shown examples of the types of resources that would require notification of the tribal monitor. The Applicant shall maintain on the Project site, for potential City inspection, documentation establishing the WEAP training was completed for all members of the construction crew involved in Ground Disturbance Activities.

On-Site Monitoring. The tribal monitor shall observe all Ground Disturbance Activities on the Project site at all times any Ground Disturbance Activities are taking place. If Ground Disturbance Activities are simultaneously occurring at multiple locations on the Project site, the tribal monitor shall determine if additional monitors are required for other locations where such simultaneous Ground Disturbance Activities are occurring. The tribal monitor(s) will complete daily monitoring logs that will provide descriptions and locations of the relevant Ground Disturbance Activities, the type of construction activities performed, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered "tribal cultural resources" as defined in California Public Resources Code Section 21074, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the Applicant and/or the City upon request to the Tribe. If any Project scheduled activities require the tribal monitor(s) to leave the Project site for a period of time and return, confirmation shall be submitted to the Tribe by the Applicant, in writing, upon completion of each set of scheduled activities and five (5) days' notice (if possible) shall be submitted to the Tribe by the Applicant, in writing, prior to the start of each set of scheduled activities. The on-site monitoring shall end when either 1) confirmation is received from the Applicant, in writing, that all scheduled activities pertaining to all Ground Disturbance Activities are completed; or 2) the Tribe provides a determination, in writing, that no future, planned construction activity, and/or development/construction phase at the Project site possesses the potential to impact any tribal cultural resources.

Discovery of Resources. In the event that any objects or artifacts that may be a tribal cultural resource are encountered during the course of any Ground Disturbance Activities, all such activities shall temporarily cease within the area of discovery, the radius of which shall be at least 25 feet or otherwise determined by the tribal monitor pursuant to the process set forth below:

1. Upon a discovery of a potential tribal cultural resource, the Applicant, or its successor, shall immediately stop all Ground Disturbance Activities in the immediate vicinity of the find (i.e. at least 25 feet or otherwise determined by the tribal monitor) until the find can be assessed by the tribal monitor.

2. If the tribal monitor determines the resources are Native American in origin, the tribal monitor will recommend steps for treatment of all discovered tribal cultural resources such as, but not limited to, the following: statement of the preference for preservation in place (i.e., avoidance) per CEQA Guidelines Section 15126.4(b)(3); description of methods for the adequate recovery of scientifically consequential information; requirements to coordinate with the tribal monitor to ensure that consideration is given to the cultural values ascribed to a resource beyond that which is scientifically important in the event the resource is Native American in origin; and procedures for curating any archaeological materials at a public, non-profit curation facility, university or museum with a research interest in the materials.

3. The Applicant, or its successor, shall implement the Tribe's treatment recommendations if the tribal monitor concludes that the Tribe's recommendations are reasonable and feasible.

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

5. The Applicant, or its successor, may recommence Ground Disturbance Activities within the specified radius of the discovery site, so long as this radius has been reviewed by the tribal monitor and determined to be reasonable and appropriate, and so long as the Applicant has complied with all of the recommendations developed and approved pursuant to the process set forth in Paragraphs 2 through 4 above. The Applicant, or its successor, may recommence Ground Disturbance Activities within the specified radius of the discovery site, so long as this radius has been

reviewed by the tribal monitor and determined to be reasonable and appropriate, and so long as the Applicant has complied with all of the recommendations developed and approved pursuant to the process set forth in Paragraphs 2 through 4 above.

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

7. Notwithstanding Paragraph 6 above, any information that Los Angeles Department of City Planning, in consultation with the Los Angeles City Attorney's Office, determines to be confidential in nature shall be excluded from submission to the SCCIC or provided to the public under the applicable provisions of the California Public Records Act, California Public Resources Code (PRC), Section 7927.000, and handled in compliance with the City's AB 52 Confidentiality Protocols.

8. Native American monitoring and excavation during construction projects will be consistent with current professional standards. All feasible care to avoid any unnecessary disturbance, physical modification, or separation of human remains and associated funerary objects shall be taken.

Discovery of Human Remains and Funerary Items. Native American human remains are defined in Public Resources Code (PRC) Section 5097.98(d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, also called associated grave goods in PRC Section 5097.98(a), are also to be treated according to this statute. If Native American human remains and/or grave goods are discovered or recognized on the Project Site, then PRC Sections 5097.9 et seq. as well as Health and Safety Code Section 7050.5 shall be followed. Human remains and grave/burial goods shall be treated alike per PRC section 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.

Cumulative Impacts

Impacts related to tribal cultural resources tend to be site-specific and are assessed on a site-by-site basis. The Project would implement Mitigation Measure MM-TRIBAL-1 to ensure that its

impacts with respect to tribal cultural resources are less than significant. The related projects would be assessed for the potential to encounter tribal cultural resources, and if necessary, would implement mitigation measures similar to the Project. As such, the Project would not contribute to any potential cumulative impacts related to tribal cultural resources, cumulative impacts related to tribal cultural resources would be less than significant.

XIX. UTILITIES AND SERVICE SYSTEMS

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

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

Less Than Significant Impact. As discussed below, Project impacts related to these issues would be less than significant.

Water

Local water conveyance infrastructure in the vicinity of the Project Site is maintained and operated by the Los Angeles Department of Water and Power (LADWP). As shown on Table XIX-1, the Project would consume an increase of approximately 1,884 gallons of water per day (gpd).

Table XIX-1
Estimated Wastewater Generation and Water Consumption[1]

Land Use	Size	Water Consumption Rate/Wastewater Generation Rate[2]	Total (gallons/day)
Mini-warehouse	78,365 sf	20 gpd/1,000 sf	1,567
Retail	3,959 sf	80 gpd/1,000 sf	317
		Total	**1,884**

sf = square feet gpd = gallons per day
1 Conservatively assumes that all water converts to wastewater.
2 Source: City of Los Angeles Department of Public Works, Bureau of Sanitation, Wastewater Engineering Services Division, Sewer Generation Factors, April 6, 2012.

As part of the permitting process for the Project, the Project Applicant would be required to coordinate with the LADWP Water Service Organization (WSO) to determine if the existing water supply infrastructure maintains sufficient capacity to accommodate the Project's demand for water. LADWP's WSO will initiate a Service Advisory Request (SAR), which when completed, will provide information regarding the range of flows and pressures that can be expected at the requested service location. The type and cost of improvements are also provided in the SAR. A project developer will then be required to participate in the cost of any necessary new water main extensions and/or replacements required to serve a project. In the event LADWP is unable to perform required installations and replacements in a timely manner, the project developer can have the work performed by a private contractor, in consultation with LADWP. Water main and related infrastructure upgrades would not be expected to create a significant impact to the physical environment because: (1) any disruption of service would be of a short-term nature; (2) replacement of the water mains would be within public and private rights-of-way; and (3) the existing infrastructure would be replaced with new infrastructure in areas that have already been significantly disturbed. For these reasons, the Project would not require or result in relocation or the construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects. Therefore, Project impacts related to water facilities would be less than significant.

Cumulative Impacts

Implementation of the Project in conjunction with the related projects could result in an increased impact on water conveyance infrastructure. It should be noted that the estimated water demand calculated above for the Project does not take into account the effectiveness of water conservation measures required in accordance with the City's Green Building Code. As with the Project, the related projects would be subject to review by LADWP to ensure that existing infrastructure would be adequate to meet the water demand requirements for each project. All development in the City is subject to LADWP and City requirements regarding potential infrastructure improvements need to meet respective water infrastructure needs. Additionally, all development in the City is required to comply with Fire Code requirements for fire flow and other

fire protection requirements and are subject to ongoing evaluations by LADWP, the City's Department of Public Works, and the Los Angeles Fire Department to ensure water conveyance infrastructure is adequate. Compliance with existing regulations would ensure that cumulative impacts related to water infrastructure would be less than significant.

Wastewater

The Project Site is located within the service area of the Hyperion Treatment Plant (HTP), which has been designed to treat 450 million gallons per day (mgd) to full secondary treatment. Full secondary treatment prevents virtually all particles suspended in effluent from being discharged into the Pacific Ocean and is consistent with the LARWQCB discharge policies for the Santa Monica Bay. The HTP currently treats an average daily flow of approximately 362 mgd. Thus, there is approximately 88 mgd available capacity. As identified on Table XIX-1, above, the Project would generate an increase of approximately 1,884 gallons of wastewater per day. With a remaining daily capacity of 88 mgd, the HTP would have adequate capacity to serve the Project. Therefore, Project impacts related to wastewater treatment would be less than significant.

Regarding sewer capacity, the City has a codified regulatory process to confirm that there is sufficient infrastructure capacity to serve a project. The LAMC includes regulations that require the City to assure available sewer capacity for new projects and to collect fees for improvements to the infrastructure system. LAMC Section 64.15 requires that the City perform a Sewer Capacity Availability Review (SCAR) when an applicant seeks a sewer permit to connect a property to the City's sewer system, proposes additional discharge through their existing public sewer connection, or proposes a future sewer connection or future development that is anticipated to generate 10,000 gallons or more of sewage per day. A SCAR provides a preliminary assessment of the capacity of the existing municipal sewer system to safely convey a project's newly generated wastewater to the appropriate sewage treatment plant.

LAMC Sections 64.11 and 64.12 require approval of a sewer permit, also called an "S" Permit, prior to connection to the wastewater system. LAMC Sections 64.11.2 and 64.16.1 require the payment of fees for new connections to the City's sewer system to assure the sufficiency of sewer infrastructure. New connections to the sewer system are assessed a Sewerage Facilities Charge. The rate structure for the Sewerage Facilities Charge is based upon wastewater flow strength as well as volume. The determination of wastewater flow strength for each applicable project is based on City guidelines for the average wastewater concentrations of two parameters, biological oxygen demand and suspended solids, for each type of land use. Sewerage Facilities Charge fees are deposited in the City's Sewer Construction and Maintenance Fund for sewer and sewage-related purposes, including, but not limited to, industrial waste control and water reclamation purposes.

If the public sewer lacks sufficient capacity, the Project would be required to build sewer lines to a point in the sewer system with sufficient capacity. Potential sewer infrastructure upgrades would not be expected to create a significant impact to the physical environment as installation of any

upgrades would primarily involve trenching within the affected streets and within areas that have already been significantly disturbed. The Project would secure any necessary permits from the Department of Public Works and would comply with all standard City requirements during construction, as described above. Therefore, Project impacts related to the construction or relocation of new facilities associated with wastewater infrastructure would be less than significant.

Cumulative Impacts

Implementation of the Project combined with the related projects in the area could increase the need for wastewater treatment. As with the Project, the related projects would be subject to review by the Bureau of Sanitation to ensure that existing infrastructure would be adequate to meet the requirements for each project. All development in the City is subject to City requirements regarding potential infrastructure improvements need to meet respective wastewater infrastructure needs. Further, with a remaining treatment capacity of approximately 88 mgd, the HTP would have adequate capacity to accommodate the wastewater treatment requirements of cumulative development, and no new or upgraded treatment facilities would be required. Therefore, the cumulative wastewater treatment impacts would be less than significant.

Storm Water Drainage

As discussed in response to Checklist Question X(c)(iii) (Hydrology and Water Quality – Storm Drain Capacity), Project impacts related to storm drainage facilities would be less than significant.

Cumulative Impacts

Refer to the cumulative impact discussion provided in response to Checklist Topic X (Hydrology and Water Quality).

Electrical Power

As discussed in response to Checklist Questions VI(a) and (b) (Energy), Project impact related to electric power facilities would be less than significant.

Cumulative Impacts

Refer to the cumulative impact discussion provided in response to Checklist Topic VI (Energy).

Natural Gas

As discussed in response to Checklist Question VI(a) and (b) (Energy), the Project would not use any natural gas and therefore would not result in any impact with respect to natural gas facilities.

Cumulative Impacts

Refer to the cumulative impact discussion provided in response to Checklist Topic VI (Energy).

Telecommunications

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

Cumulative Impacts

Like the Project, the related projects represent infill development served by existing utilities, including telecommunications infrastructure. As with the Project, the related projects would likely require project- or site-specific infrastructure to connect to the existing infrastructure, but the related projects would not require new or expanded facilities as they are of similar scale as the Project and located in an area served by existing utilities. Therefore, cumulative impacts related to telecommunications infrastructure would be less than significant.

b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less Than Significant Impact. A significant impact may occur if a project were to increase water consumption to such a degree that new water sources would need to be identified, or that existing resources would be consumed at a pace greater than planned for by purveyors, distributors, and service providers. The City's water supply comes from local groundwater sources, the Los Angeles-Owens River Aqueduct, State Water Project, and from the Metropolitan Water District of Southern California, which is obtained from the Colorado River Aqueduct. These sources, along with recycled water, are expected to supply the City's water needs in the years to come.

As shown on Table XIX-1, above, the Project would consume a net increase of approximately 1,884 gallons of water per day. As concluded in LADWP's 2020 Urban Water Management Plan (UWMP), projected water demand for the City would be met by the available supplies during an average year, single dry year, and multiple dry year in each year from 2025 to 2045. LADWP's 2020 UWMP also includes a drought risk assessment, which shows that there would be no water shortages over the five-year drought, which started in 2021.[96] As such, the Project would not require new or additional water supply or entitlements, and impacts related to water supply would be less than significant.

[96] Los Angeles Department of Water and Power, 2020 Urban Water Management Plan, page 11-13.

Cumulative Impacts

Implementation of the Project in conjunction with the related projects would increase demand for water services provided by the City's water supply system. LADWP (through its UWMP) anticipates that its projected water supplies will meet demand through the year 2040. In terms of the City's overall water supply condition, any project that is consistent with the City's General Plan has been taken into account in the planned growth of the water system. In addition, any project that conforms to the demographic projections from SCAG's RTP/SCS and is located in the service area is considered to have been included in LADWP's water supply planning efforts so that projected water supplies would meet projected demands. For projects that meet the requirements established pursuant to SB 610, SB 221, and Sections 10910-10915 of the State Water Code, a water supply assessment demonstrating sufficient water availability is required on a project-by-project basis. Similar to the Project, the related projects would be required to comply with City and State water code and conservation programs for both water supply and infrastructure.

Both the Project and the related projects would be subject to the water conservation measures outlined in the City's Green Building Code, which would partially offset the cumulative demand for water. LADWP undertakes expansion or modification of water service infrastructure to serve future growth in the City as required in the normal process of providing water service. For these reasons, cumulative impacts related to water would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project would increase wastewater generation to such a degree that the capacity of facilities currently serving the Project Site would be exceeded. As discussed in subsection (a), above, with a remaining daily capacity of 88 mgd, the HTP would have adequate capacity to serve the Project. Therefore, Project impacts related to wastewater treatment would be less than significant.

Cumulative Impacts

For a full discussion of cumulative impacts with respect to wastewater treatment, please see subsection (a), above. As discussed therein, cumulative impacts related to wastewater treatment would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project were to increase solid waste generation to a degree that existing and projected landfill capacity would be insufficient to accommodate the additional solid waste or impair the attainment of solid waste reduction goals.

The landfills that serve the City and the capacity of these landfills are shown in Table XIX-2, below. As shown, the landfills have an approximate available daily intake of 13,886 tons.

Table XIX-2
Landfill Capacity

Landfill Facility	Estimated Remaining Life (years)	Estimated Remaining Disposal Capacity (million tons)	Permitted Intake (tons/day)	2019 Average Daily Disposal (tons/day)	Available Daily Intake (tons/day)
Antelope Valley	13	10.18	3,600	2,785	815
Chiquita Canyon	27	54.4	12,000	6,114	5,886
Lancaster	81	9.89	3,000	395	2,605
Sunshine Canyon	17	54.01	12,100	7,420	4,580
				Total	**13,886**

Source: County of Los Angeles, Countywide Integrated Waste Management Plan, 2021 Annual Report, December 2022.

Construction

As shown in Table XIX-3, the Project would result in approximately 165 tons of construction waste over the entirety of the construction period, not accounting for any mandatory recycling. Pursuant to the requirements of Senate Bill 1374[97], the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Materials that could be recycled or salvaged include asphalt, glass, and concrete. Given the remaining permitted capacity of the landfills open to the City, the landfills serving the Project Site would have sufficient capacity to accommodate the Project's construction solid waste disposal needs.

Table XIX-3
Project Demolition and Construction Waste Generation

Building	Size	Rate	Total (tons)
Construction Waste			
Non-residential	82,324 sf	4.02 pounds / sf	165
		Total	**165**

Over the entire total schedule of construction.
sf = square feet, 1 ton = 2,000 pounds
Based on 4.02 pounds of nonresidential construction per square foot. (Source: U.S. Environmental Protection Agency Report No. EPA530-98-010. Characterization of Building Related Construction and Demolition Debris in the United States, June 1998, Tables A-1 and A-2, page A-1: http://www.epa.gov/osw/hazard/generation/sqg/cd-rpt.pdf).

[97] https://www.calrecycle.ca.gov/lgcentral/library/canddmodel/instruction/sb1374

Operation

The trash and recycling bins included as part of the Project would be locked and only available to the mini-warehouse and retail employees. Nevertheless, the Project's estimated solid waste generation has been conservatively estimated to include both the retail and mini-warehouse uses. As shown on Table XIX-4, the Project would generate approximately 412 pounds (0.21 tons) of solid waste per day. This total is conservative and does not account for the effectiveness of recycling efforts, which the Project would be required by the City to implement. These regulations include AB 341, which requires California commercial enterprises and public entities that generate four cubic yards or more per week of waste, and multi-family housing with five or more units, to adopt recycling practices. Likewise, the analysis does not include implementation of the City's Zero Waste Plan, which is expected to result in a reduction of landfill disposal Citywide, with a goal of reaching a Citywide recycling rate of 90 percent by the year 2025.[98]

With a remaining daily intake capacity of approximately 13,886 tons of solid waste per day, the four Class III landfills serving the City that accept commercial solid waste could accommodate the Project's increase of approximately 0.21 tons of solid waste per day. Further, pursuant to AB 939, each city and county in the state must divert 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting. Therefore, Project impacts related to solid waste would be less than significant.

Table XIX-4
Estimated Solid Waste Generation

Land Use	Size	Generation Rate[1]	Total (lbs)
Mini-warehouse	78,365 sf	5 lbs/1,000 sf	392
Retail	3,959 sf	5 lbs/day/1,000 sf	20
		Total	**412**

lbs = pounds sf = square feet
[1] Source: CalRecycle website: https://www2.calrecycle.ca.gov/wastecharacterization/general/rates.
Note: Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.

Cumulative Impacts

The Project in combination with the related projects would generate additional solid waste. As shown in Table XIX-2, above, the landfills serving the City have an approximate available daily intake of 13,886 tons. Therefore, the facilities serving the Project area would have adequate capacity to accommodate the solid waste generated by cumulative development. Similar to the Project, the related projects would be required by the City to participate in regional source reduction and recycling programs pursuant to AB 939, which would further reduce the amount of solid waste to be disposed of at the landfills. Thus, cumulative development would not create the

[98] LA Sanitation, Solid Waste Integrated Resources Plan, https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-s-zwswirp?_adf.ctrl-state=1bepuilnjy_5&_afrLoop=15197272541934425#!, accessed October 25, 2023.

need for new or expanded landfills, and cumulative impacts with respect to solid waste service would be less than significant.

e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. Solid waste management in the State is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): 1) source reduction; 2) recycling and composting; and 3) environmentally safe transformation and land disposal. In addition to AB 939, SB 1374 requires that the Project implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Additionally, the City is currently implementing its "Zero-Waste-to-Landfill" goal to achieve zero waste to landfills by 2025 to enhance the Solid Waste Integrated Resources Planning Process. The Project would comply with the applicable regulations associated with solid waste, including AB 939, SB 1374, and the Construction and Demolition Waste Recycling Ordinance (Ordinance No. 181,519), which requires all mixed construction and demolition waste generated within City limits be taken to City certified construction and demolition waste processors. Since the Project would comply with federal, State, and local statutes and regulations related to solid waste, a less than significant impact would occur.

Cumulative Impacts

All development in the City, including the Project and the related projects, would be required to comply with the City's recycling programs and federal, state, and local management and reduction statutes and regulations related to solid waste. Therefore, cumulative impacts related to this issue would be less than significant.

XX. WILDFIRE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

a. Substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. The Project Site is not located in or near a state responsibility area, nor is the Project Site located in a Very High Fire Hazard Severity Zone.[99] Therefore, no impact would occur.

b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact. The Project Site is not located in or near a state responsibility area, nor is the Project Site located in a Very High Fire Hazard Severity Zone.[100] In addition, the Project Site is flat and is not located in a hillside zone. Therefore, no impact would occur.

[99] City of Los Angeles, ZIMAS Parcel Profile Report, website: http://zimas.lacity.org, February 20, 2024.

[100] City of Los Angeles, ZIMAS Parcel Profile Report, website: http://zimas.lacity.org, February 20, 2024.

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

No Impact. The Project Site is not located in or near a state responsibility area, nor is the Project Site located in a Very High Fire Hazard Severity Zone.[101] Therefore, no impact would occur.

d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. The Project Site is not located in or near a state responsibility area, nor is the Project Site located in a Very High Fire Hazard Severity Zone.[102] Therefore, no impact would occur.

Cumulative Impacts

The Project vicinity, including the Project Site and the sites of the related projects, is not within or near a very high fire severity zone, and the Project would not result in any impacts related to wildfire. Therefore, no cumulative impacts related to wildfire would occur.

[101] City of Los Angeles, ZIMAS Parcel Profile Report, website: http://zimas.lacity.org, February 20, 2024.

[102] City of Los Angeles, ZIMAS Parcel Profile Report, website: http://zimas.lacity.org, February 20, 2024.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

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

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

Less Than Significant with Mitigation Incorporated. As discussed under Checklist Topic IV (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, 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 discussed under Checklist Topic XVIII (Tribal Cultural Resources), with implementation of mitigation, the Project would not have the potential to eliminate important examples of the major periods of California history or prehistory related to tribal cultural resources. Therefore, these impacts would be less than significant.

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

Less Than Significant Impact. Based on the analysis contained in this IS/MND, the Project's contribution to cumulative impacts would not be considerable.

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

Less Than Significant Impact. A significant impact could occur if the Project has the potential to result in significant impacts, as discussed in the preceding sections. Based on the analysis contained in this IS/MND, the Project would not result in any direct or indirect adverse effects on human beings, and all Project impacts would be less than significant.



DouglasKim+Associates,LLC

FUTURE EMISSIONS

12681 Jefferson Boulevard (Future) Detailed Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	12681 Jefferson Boulevard (Future)
Construction Start Date	9/18/2027
Operational Year	2028
Lead Agency	City of Los Angeles
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	3.50
Precipitation (days)	8.20
Location	12681 Jefferson Blvd, Los Angeles, CA 90066, USA
County	Los Angeles-South Coast
City	Los Angeles
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	4429
EDFZ	16
Electric Utility	Los Angeles Department of Water & Power
Gas Utility	Southern California Gas
App Version	2022.1.1.24

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description

Strip Mall	3.96	1000sqft	0.10	3,959	500	—	—	—
Parking Lot	78.0	Space	0.10	0.00	500	—	—	—
Industrial Park	78.4	1000sqft	0.90	78,365	1,000	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Unmit.	19.0	14.0	20.7	0.03	0.49	1.44	1.92	0.45	0.28	0.73
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Unmit.	1.53	18.9	18.8	0.06	0.61	4.41	5.02	0.57	1.78	2.35
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—
Unmit.	2.86	6.25	9.28	0.02	0.18	0.43	0.55	0.17	0.16	0.26
Annual (Max)	—	—	—	—	—	—	—	—	—	—
Unmit.	0.52	1.14	1.69	< 0.005	0.03	0.08	0.10	0.03	0.03	0.05

2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—

2027	1.41	14.0	15.8	0.03	0.49	1.44	1.92	0.45	0.28	0.73
2028	19.0	13.4	20.7	0.03	0.40	0.81	1.21	0.36	0.20	0.56
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—
2027	1.49	18.9	16.9	0.06	0.61	4.41	5.02	0.57	1.78	2.35
2028	1.53	12.6	18.8	0.03	0.38	0.73	1.11	0.35	0.17	0.52
Average Daily	—	—	—	—	—	—	—	—	—	—
2027	0.27	2.69	2.97	0.01	0.09	0.43	0.52	0.08	0.16	0.25
2028	2.86	6.25	9.28	0.02	0.18	0.37	0.55	0.17	0.09	0.26
Annual	—	—	—	—	—	—	—	—	—	—
2027	0.05	0.49	0.54	< 0.005	0.02	0.08	0.09	0.02	0.03	0.04
2028	0.52	1.14	1.69	< 0.005	0.03	0.07	0.10	0.03	0.02	0.05

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Unmit.	3.72	1.23	13.1	0.03	0.05	2.14	2.19	0.05	0.54	0.59
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Unmit.	3.12	1.27	8.85	0.02	0.05	2.14	2.18	0.05	0.54	0.59
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—
Unmit.	3.51	1.30	11.5	0.02	0.05	2.12	2.18	0.05	0.54	0.59
Annual (Max)	—	—	—	—	—	—	—	—	—	—
Unmit.	0.64	0.24	2.10	< 0.005	0.01	0.39	0.40	0.01	0.10	0.11

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Mobile	1.13	0.77	9.16	0.02	0.01	2.14	2.15	0.01	0.54	0.56
Area	2.56	0.03	3.58	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005
Energy	0.02	0.43	0.36	< 0.005	0.03	—	0.03	0.03	—	0.03
Water	—	—	—	—	—	—	—	—	—	—
Waste	—	—	—	—	—	—	—	—	—	—
Refrig.	—	—	—	—	—	—	—	—	—	—
Total	3.72	1.23	13.1	0.03	0.05	2.14	2.19	0.05	0.54	0.59
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Mobile	1.12	0.85	8.49	0.02	0.01	2.14	2.15	0.01	0.54	0.56
Area	1.97	—	—	—	—	—	—	—	—	—
Energy	0.02	0.43	0.36	< 0.005	0.03	—	0.03	0.03	—	0.03
Water	—	—	—	—	—	—	—	—	—	—
Waste	—	—	—	—	—	—	—	—	—	—
Refrig.	—	—	—	—	—	—	—	—	—	—
Total	3.12	1.27	8.85	0.02	0.05	2.14	2.18	0.05	0.54	0.59
Average Daily	—	—	—	—	—	—	—	—	—	—
Mobile	1.11	0.85	8.70	0.02	0.01	2.12	2.14	0.01	0.54	0.55
Area	2.37	0.02	2.45	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Energy	0.02	0.43	0.36	< 0.005	0.03	—	0.03	0.03	—	0.03
Water	—	—	—	—	—	—	—	—	—	—
Waste	—	—	—	—	—	—	—	—	—	—
Refrig.	—	—	—	—	—	—	—	—	—	—

Total	3.51	1.30	11.5	0.02	0.05	2.12	2.18	0.05	0.54	0.59
Annual	—	—	—	—	—	—	—	—	—	—
Mobile	0.20	0.16	1.59	< 0.005	< 0.005	0.39	0.39	< 0.005	0.10	0.10
Area	0.43	< 0.005	0.45	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Energy	< 0.005	0.08	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01
Water	—	—	—	—	—	—	—	—	—	—
Waste	—	—	—	—	—	—	—	—	—	—
Refrig.	—	—	—	—	—	—	—	—	—	—
Total	0.64	0.24	2.10	< 0.005	0.01	0.39	0.40	0.01	0.10	0.11

3. Construction Emissions Details

3.1. Demolition (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.34	12.4	14.4	0.02	0.47	—	0.47	0.43	—	0.43
Demolition	—	—	—	—	—	0.90	0.90	—	0.14	0.14
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.34	12.4	14.4	0.02	0.47	—	0.47	0.43	—	0.43
Demolition	—	—	—	—	—	0.90	0.90	—	0.14	0.14
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.04	0.34	0.40	< 0.005	0.01	—	0.01	0.01	—	0.01
Demolition	—	—	—	—	—	0.02	0.02	—	< 0.005	< 0.005
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.06	0.07	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Demolition	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.04	0.75	0.00	0.00	0.16	0.16	0.00	0.04	0.04
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.02	1.52	0.58	0.01	0.02	0.37	0.39	0.02	0.10	0.12
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.05	0.64	0.00	0.00	0.16	0.16	0.00	0.04	0.04
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.02	1.58	0.59	0.01	0.02	0.37	0.39	0.02	0.10	0.12
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.04	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005
Annual	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005

3.3. Site Preparation (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.19	10.4	11.6	0.02	0.47	—	0.47	0.43	—	0.43
Dust From Material Movement	—	—	—	—	—	2.44	2.44	—	1.17	1.17
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.34	0.38	< 0.005	0.02	—	0.02	0.01	—	0.01
Dust From Material Movement	—	—	—	—	—	0.08	0.08	—	0.04	0.04
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.06	0.07	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Dust From Material Movement	—	—	—	—	—	0.01	0.01	—	0.01	0.01
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.38	0.00	0.00	0.10	0.10	0.00	0.02	0.02
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.5. Grading (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.37	12.2	13.9	0.02	0.54	—	0.54	0.50	—	0.50
Dust From Material Movement	—	—	—	—	—	2.78	2.78	—	1.34	1.34
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.08	0.70	0.80	< 0.005	0.03	—	0.03	0.03	—	0.03
Dust From Material Movement	—	—	—	—	—	0.16	0.16	—	0.08	0.08
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.13	0.15	< 0.005	0.01	—	0.01	0.01	—	0.01
Dust From Material Movement	—	—	—	—	—	0.03	0.03	—	0.01	0.01
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.04	0.51	0.00	0.00	0.13	0.13	0.00	0.03	0.03
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.08	6.64	2.55	0.04	0.07	1.49	1.57	0.07	0.41	0.48
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.39	0.15	< 0.005	< 0.005	0.09	0.09	< 0.005	0.02	0.03
Annual	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.07	0.03	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	0.01

3.7. Building Construction (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.97	8.25	9.91	0.02	0.26	—	0.26	0.24	—	0.24
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.08	0.71	0.85	< 0.005	0.02	—	0.02	0.02	—	0.02
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.13	0.16	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.12	0.15	1.74	0.00	0.00	0.45	0.45	0.00	0.10	0.10
Vendor	0.01	0.46	0.22	< 0.005	< 0.005	0.12	0.12	< 0.005	0.03	0.03
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.16	0.00	0.00	0.04	0.04	0.00	0.01	0.01

Vendor	< 0.005	0.04	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005
Vendor	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.9. Building Construction (2028) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.93	7.89	9.88	0.02	0.23	—	0.23	0.21	—	0.21
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.93	7.89	9.88	0.02	0.23	—	0.23	0.21	—	0.21
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.48	4.06	5.08	0.01	0.12	—	0.12	0.11	—	0.11
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.09	0.74	0.93	< 0.005	0.02	—	0.02	0.02	—	0.02
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.12	0.12	1.93	0.00	0.00	0.45	0.45	0.00	0.10	0.10
Vendor	0.01	0.42	0.20	< 0.005	< 0.005	0.12	0.12	< 0.005	0.03	0.03
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.12	0.13	1.64	0.00	0.00	0.45	0.45	0.00	0.10	0.10
Vendor	0.01	0.44	0.21	< 0.005	< 0.005	0.12	0.12	< 0.005	0.03	0.03
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.07	0.88	0.00	0.00	0.23	0.23	0.00	0.05	0.05
Vendor	< 0.005	0.23	0.10	< 0.005	< 0.005	0.06	0.06	< 0.005	0.02	0.02
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.16	0.00	0.00	0.04	0.04	0.00	0.01	0.01
Vendor	< 0.005	0.04	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.11. Paving (2028) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.43	4.13	6.47	0.01	0.15	—	0.15	0.13	—	0.13
Paving	< 0.005	—	—	—	—	—	—	—	—	—

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.43	4.13	6.47	0.01	0.15	—	0.15	0.13	—	0.13
Paving	< 0.005	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.18	1.73	2.71	< 0.005	0.06	—	0.06	0.06	—	0.06
Paving	< 0.005	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.32	0.50	< 0.005	0.01	—	0.01	0.01	—	0.01
Paving	< 0.005	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.04	0.71	0.00	0.00	0.16	0.16	0.00	0.04	0.04
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.05	0.60	0.00	0.00	0.16	0.16	0.00	0.04	0.04
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.26	0.00	0.00	0.07	0.07	0.00	0.02	0.02

Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.13. Architectural Coating (2028) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.11	0.81	1.12	< 0.005	0.02	—	0.02	0.01	—	0.01
Architectural Coatings	17.4	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.10	0.13	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Architectural Coatings	2.09	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.02	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005

Architectural Coatings	0.38	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.39	0.00	0.00	0.09	0.09	0.00	0.02	0.02
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.15. Trenching (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.16	1.22	1.41	< 0.005	0.04	—	0.04	0.04	—	0.04
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.10	0.12	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.02	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.25	0.00	0.00	0.07	0.07	0.00	0.02	0.02
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.02	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.17. Trenching (2028) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.16	1.20	1.41	< 0.005	0.04	—	0.04	0.04	—	0.04
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.04	0.05	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.24	0.00	0.00	0.07	0.07	0.00	0.02	0.02
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Annual	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Mobile source emissions results are presented in Sections 2.6. No further detailed breakdown of emissions is available.

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—
Parking Lot	—	—	—	—	—	—	—	—	—	—
Industrial Park	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—
Parking Lot	—	—	—	—	—	—	—	—	—	—
Industrial Park	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

Annual	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—
Parking Lot	—	—	—	—	—	—	—	—	—	—
Industrial Park	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Strip Mall	< 0.005	0.01	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Parking Lot	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Industrial Park	0.02	0.42	0.36	< 0.005	0.03	—	0.03	0.03	—	0.03
Total	0.02	0.43	0.36	< 0.005	0.03	—	0.03	0.03	—	0.03
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Strip Mall	< 0.005	0.01	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Parking Lot	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Industrial Park	0.02	0.42	0.36	< 0.005	0.03	—	0.03	0.03	—	0.03
Total	0.02	0.43	0.36	< 0.005	0.03	—	0.03	0.03	—	0.03
Annual	—	—	—	—	—	—	—	—	—	—
Strip Mall	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Parking Lot	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Industrial Park	< 0.005	0.08	0.06	< 0.005	0.01	—	0.01	0.01	—	0.01
Total	< 0.005	0.08	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01

4.3. Area Emissions by Source

4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Consumer Products	1.76	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.21	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.59	0.03	3.58	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005
Total	2.56	0.03	3.58	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Consumer Products	1.76	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.21	—	—	—	—	—	—	—	—	—
Total	1.97	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.32	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.04	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.07	< 0.005	0.45	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Total	0.43	< 0.005	0.45	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—
Parking Lot	—	—	—	—	—	—	—	—	—	—
Industrial Park	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—
Parking Lot	—	—	—	—	—	—	—	—	—	—
Industrial Park	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—
Parking Lot	—	—	—	—	—	—	—	—	—	—
Industrial Park	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—
Parking Lot	—	—	—	—	—	—	—	—	—	—
Industrial Park	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—
Parking Lot	—	—	—	—	—	—	—	—	—	—
Industrial Park	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—
Parking Lot	—	—	—	—	—	—	—	—	—	—
Industrial Park	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—
Industrial Park	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—
Industrial Park	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—
Industrial Park	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—

Subtotal	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Demolition	Demolition	9/18/2027	10/2/2027	5.00	10.0	—

Site Preparation	Site Preparation	10/3/2027	10/19/2027	5.00	12.0	—
Grading	Grading	10/20/2027	11/17/2027	5.00	21.0	—
Building Construction	Building Construction	11/18/2027	9/19/2028	5.00	219	—
Paving	Paving	2/18/2028	9/19/2028	5.00	153	—
Architectural Coating	Architectural Coating	7/20/2028	9/19/2028	5.00	44.0	—
Trenching	Trenching	11/18/2027	1/18/2028	5.00	44.0	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Concrete/Industrial Saws	Diesel	Average	1.00	8.00	33.0	0.73
Demolition	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Demolition	Tractors/Loaders/Backhoes	Diesel	Average	3.00	8.00	84.0	0.37
Site Preparation	Graders	Diesel	Average	1.00	8.00	148	0.41
Site Preparation	Rubber Tired Dozers	Diesel	Average	1.00	7.00	367	0.40
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Average	1.00	8.00	84.0	0.37
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Grading	Tractors/Loaders/Backhoes	Diesel	Average	2.00	7.00	84.0	0.37
Building Construction	Cranes	Diesel	Average	1.00	6.00	367	0.29
Building Construction	Forklifts	Diesel	Average	1.00	6.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	1.00	6.00	84.0	0.37

Building Construction	Welders	Diesel	Average	3.00	8.00	46.0	0.45
Paving	Cement and Mortar Mixers	Diesel	Average	1.00	6.00	10.0	0.56
Paving	Pavers	Diesel	Average	1.00	6.00	81.0	0.42
Paving	Paving Equipment	Diesel	Average	1.00	8.00	89.0	0.36
Paving	Rollers	Diesel	Average	1.00	7.00	36.0	0.38
Paving	Tractors/Loaders/Backhoes	Diesel	Average	1.00	8.00	84.0	0.37
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48
Trenching	Trenchers	Diesel	Average	1.00	8.00	40.0	0.50

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	—	—	—	—
Demolition	Worker	12.5	18.5	LDA,LDT1,LDT2
Demolition	Vendor	—	10.2	HHDT,MHDT
Demolition	Hauling	15.9	25.0	HHDT
Demolition	Onsite truck	—	—	HHDT
Site Preparation	—	—	—	—
Site Preparation	Worker	7.50	18.5	LDA,LDT1,LDT2
Site Preparation	Vendor	—	10.2	HHDT,MHDT
Site Preparation	Hauling	0.00	25.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	10.0	18.5	LDA,LDT1,LDT2
Grading	Vendor	—	10.2	HHDT,MHDT

Grading	Hauling	80.6	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	34.2	18.5	LDA,LDT1,LDT2
Building Construction	Vendor	13.5	10.2	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	12.5	18.5	LDA,LDT1,LDT2
Paving	Vendor	—	10.2	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	6.84	18.5	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	10.2	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT
Trenching	—	—	—	—
Trenching	Worker	5.00	18.5	LDA,LDT1,LDT2
Trenching	Vendor	—	10.2	HHDT,MHDT
Trenching	Hauling	0.00	20.0	HHDT
Trenching	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	0.00	0.00	123,486	41,162	261

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (Ton of Debris)	Acres Paved (acres)
Demolition	0.00	0.00	0.00	633	—
Site Preparation	—	—	11.3	0.00	—
Grading	—	13,541	1.00	0.00	—
Paving	0.00	0.00	0.00	0.00	0.10

5.6.2. Construction Earthmoving Control Strategies

Control Strategies Applied	Frequency (per day)	PM10 Reduction	PM2.5 Reduction
Water Exposed Area	2	61%	61%
Water Demolished Area	2	36%	36%

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Strip Mall	0.00	0%
Parking Lot	0.10	100%
Industrial Park	0.00	0%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2027	0.00	690	0.05	0.01
2028	0.00	690	0.05	0.01

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Total all Land Uses	382	382	382	139,430	3,012	3,012	3,012	1,099,380

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
0	0.00	123,486	41,162	261

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	250

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Strip Mall	39,418	690	0.0489	0.0069	19,495
Parking Lot	3,816	690	0.0489	0.0069	0.00
Industrial Park	1,248,256	690	0.0489	0.0069	1,574,499

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Strip Mall	293,253	7,012
Parking Lot	0.00	7,012
Industrial Park	18,121,906	14,025

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Strip Mall	4.16	—
Parking Lot	0.00	—
Industrial Park	97.2	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Strip Mall	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
Strip Mall	Stand-alone retail refrigerators and freezers	R-134a	1,430	0.04	1.00	0.00	1.00
Strip Mall	Walk-in refrigerators and freezers	R-404A	3,922	< 0.005	7.50	7.50	20.0
Industrial Park	Other commercial A/C and heat pumps	R-410A	2,088	0.30	4.00	4.00	18.0

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor

5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)

5.17. User Defined

Equipment Type	Fuel Type

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	5.27	annual days of extreme heat
Extreme Precipitation	5.20	annual days with precipitation above 20 mm
Sea Level Rise	0.00	meters of inundation depth
Wildfire	0.00	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	1	0	0	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	0	0	N/A
Wildfire	1	0	0	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	1	1	1	2
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	1	1	2

Wildfire	1	1	1	2
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	37.6
AQ-PM	64.7
AQ-DPM	63.4
Drinking Water	52.7
Lead Risk Housing	0.24
Pesticides	0.00
Toxic Releases	82.0
Traffic	79.0
Effect Indicators	—
CleanUp Sites	70.2

Groundwater	96.1
Haz Waste Facilities/Generators	83.6
Impaired Water Bodies	99.6
Solid Waste	11.6
Sensitive Population	—
Asthma	19.6
Cardio-vascular	22.5
Low Birth Weights	30.8
Socioeconomic Factor Indicators	—
Education	4.21
Housing	64.8
Linguistic	26.4
Poverty	16.8
Unemployment	39.2

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	72.87309124
Employed	73.4377005
Median HI	74.22045425
Education	—
Bachelor's or higher	97.74156294
High school enrollment	100
Preschool enrollment	51.02014629
Transportation	—

Auto Access	84.51174131
Active commuting	53.36840755
Social	—
2-parent households	64.04465546
Voting	60.19504684
Neighborhood	—
Alcohol availability	53.62504812
Park access	32.97831387
Retail density	81.27807006
Supermarket access	77.58244578
Tree canopy	56.62774285
Housing	—
Homeownership	25.94636212
Housing habitability	44.62979597
Low-inc homeowner severe housing cost burden	65.50750674
Low-inc renter severe housing cost burden	25.94636212
Uncrowded housing	84.29359682
Health Outcomes	—
Insured adults	76.54305146
Arthritis	98.1
Asthma ER Admissions	97.2
High Blood Pressure	97.4
Cancer (excluding skin)	77.2
Asthma	88.8
Coronary Heart Disease	98.1
Chronic Obstructive Pulmonary Disease	99.1
Diagnosed Diabetes	98.2

Life Expectancy at Birth	73.5
Cognitively Disabled	98.4
Physically Disabled	93.4
Heart Attack ER Admissions	94.8
Mental Health Not Good	91.8
Chronic Kidney Disease	98.0
Obesity	89.8
Pedestrian Injuries	44.8
Physical Health Not Good	99.0
Stroke	98.4
Health Risk Behaviors	—
Binge Drinking	7.5
Current Smoker	92.2
No Leisure Time for Physical Activity	99.1
Climate Change Exposures	—
Wildfire Risk	28.1
SLR Inundation Area	27.1
Children	22.0
Elderly	92.4
English Speaking	71.9
Foreign-born	32.4
Outdoor Workers	96.3
Climate Change Adaptive Capacity	—
Impervious Surface Cover	17.3
Traffic Density	61.9
Traffic Access	87.4
Other Indices	—

Hardship	8.7
Other Decision Support	—
2016 Voting	44.7

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	36.0
Healthy Places Index Score for Project Location (b)	79.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Land Use	Developer plans
Construction: Construction Phases	Developer information
Construction: Off-Road Equipment	Model defaults
Construction: Dust From Material Movement	9,000 CY with soil expansion factors for topsoil and dry clay

Construction: Trips and VMT	.



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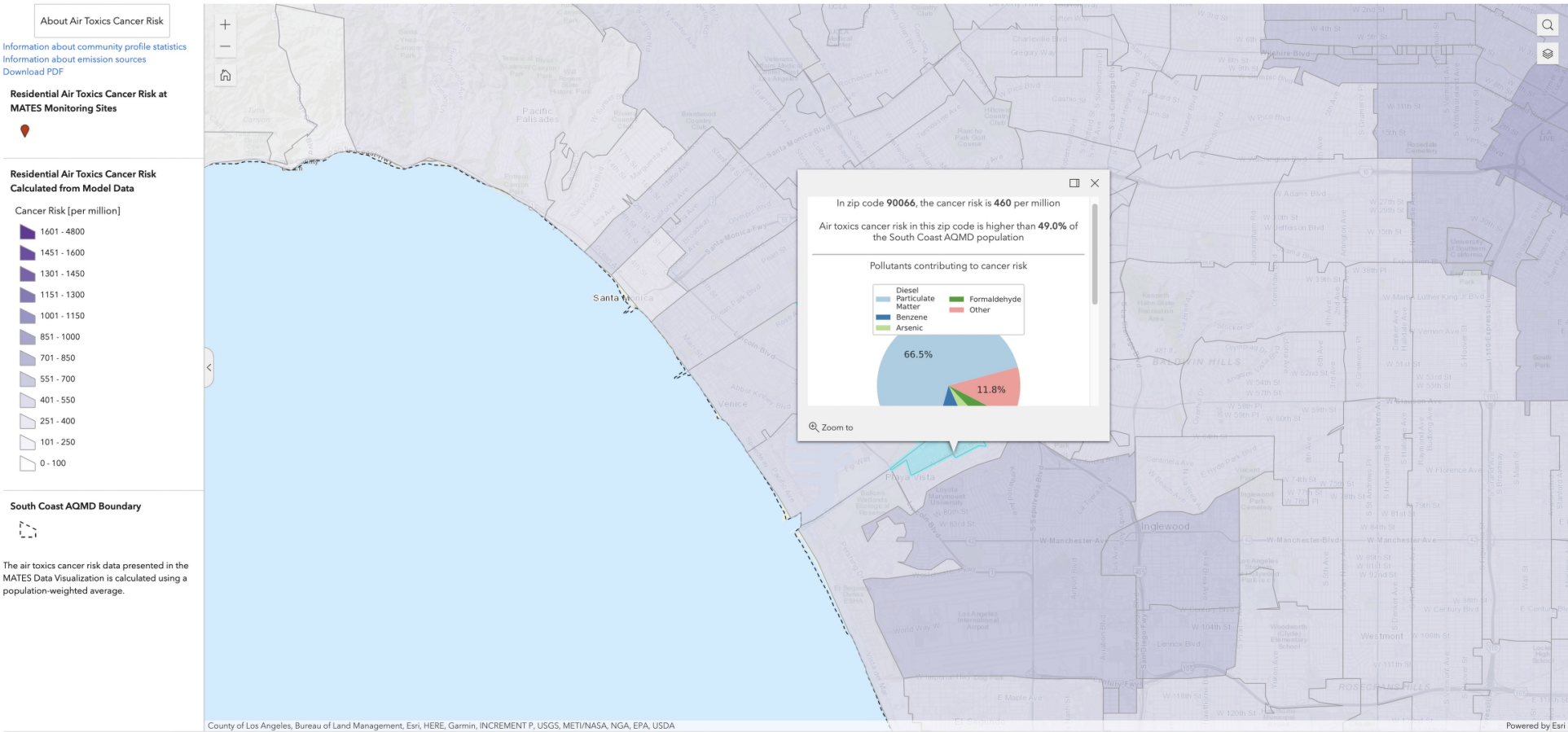
MATES V TOXIC EMISSIONS OVERVIEW


About Air Toxics Cancer Risk
Information about community profile statistics
Information about emission sources
Download PDF
Residential Air Toxics Cancer Risk at MATES Monitoring Sites
Residential Air Toxics Cancer Risk Calculated from Model Data
Cancer Risk [per million]
1601 - 4800
1451 - 1600
1301 - 1450
1151 - 1300
1001 - 1150
851 - 1000
701 - 850
551 - 700
401 - 550
251 - 400
101 - 250
0 - 100
South Coast AQMD Boundary
The air toxics cancer risk data presented in the MATES Data Visualization is calculated using a population-weighted average.
In zip code 90066, the cancer risk is 460 per million
Air toxics cancer risk in this zip code is higher than 49.0% of the South Coast AQMD population
Pollutants contributing to cancer risk
Diesel Particulate Matter
Benzene
Arsenic
Formaldehyde
Other
66.5%
11.8%
Zoom to
Santa Monica
Venice
Inglewood
Westmont
County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, INCREMENT P, USGS, METI/NASA, NGA, EPA, USDA
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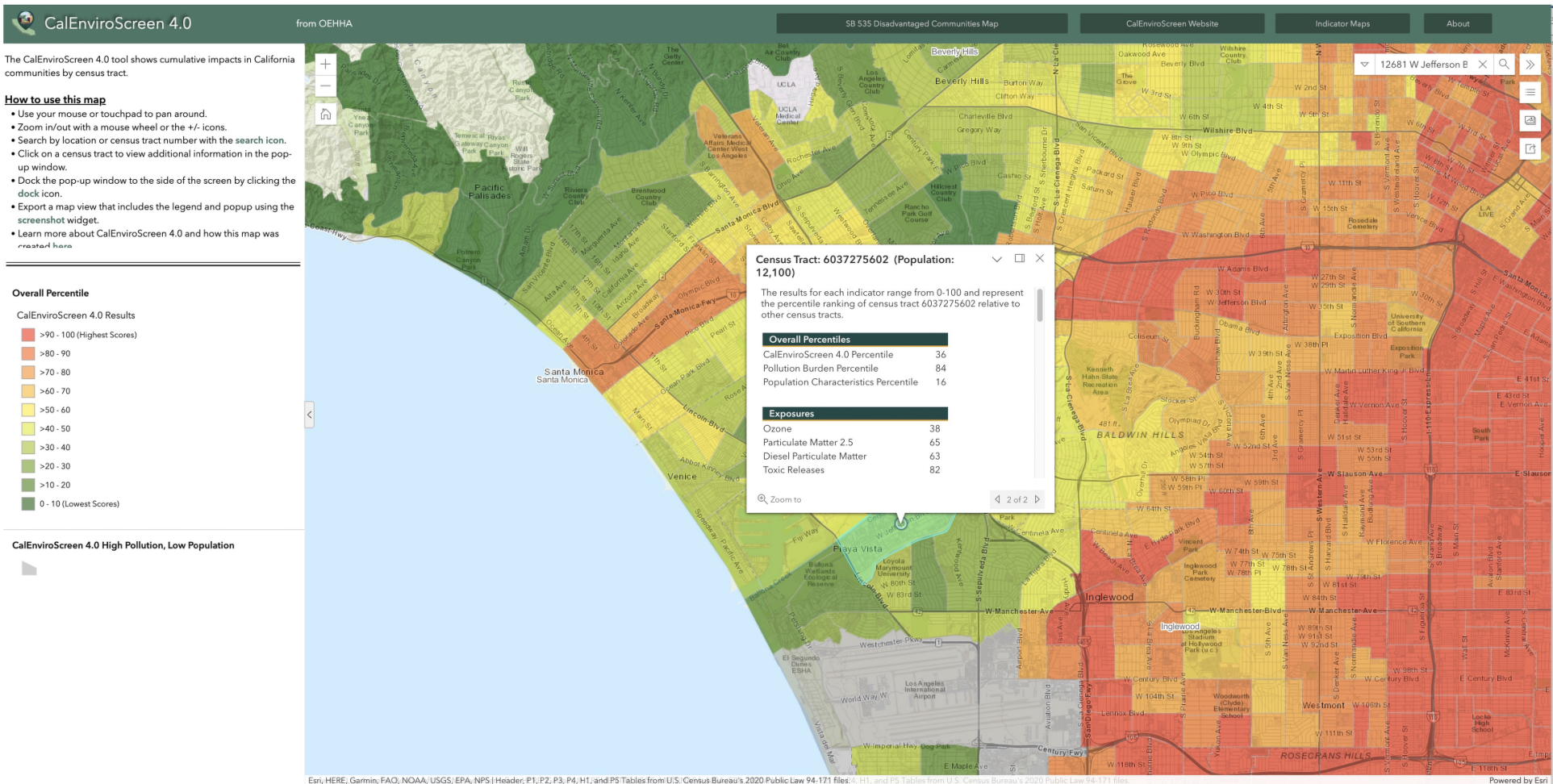
CALENVIROSCREEN 4.0 OUTPUT


CalEnviroScreen 4.0
from OEHHA
SB 535 Disadvantaged Communities Map
CalEnviroScreen Website
Indicator Maps
About
The CalEnviroScreen 4.0 tool shows cumulative impacts in California communities by census tract.
How to use this map
• Use your mouse or touchpad to pan around.
• Zoom in/out with a mouse wheel or the +/- icons.
• Search by location or census tract number with the search icon.
• Click on a census tract to view additional information in the pop-up window.
• Dock the pop-up window to the side of the screen by clicking the dock icon.
• Export a map view that includes the legend and popup using the screenshot widget.
• Learn more about CalEnviroScreen 4.0 and how this map was created here
Overall Percentile
CalEnviroScreen 4.0 Results
>90 - 100 (Highest Scores)
>80 - 90
>70 - 80
>60 - 70
>50 - 60
>40 - 50
>30 - 40
>20 - 30
>10 - 20
0 - 10 (Lowest Scores)
CalEnviroScreen 4.0 High Pollution, Low Population
12681 W Jefferson B
Census Tract: 6037275602 (Population: 12,100)
The results for each indicator range from 0-100 and represent the percentile ranking of census tract 6037275602 relative to other census tracts.
Overall Percentiles
CalEnviroScreen 4.0 Percentile 36
Pollution Burden Percentile 84
Population Characteristics Percentile 16
Exposures
Ozone 38
Particulate Matter 2.5 65
Diesel Particulate Matter 63
Toxic Releases 82
Zoom to
2 of 2
Beverly Hills
Pacific Palisades
Santa Monica
Venice
Playa Vista
Inglewood
BALDWIN HILLS
ROSECRANS HILLS
Westmont
Esri, HERE, Garmin, FAO, NOAA, USGS, EPA, NPS | Header, P1, P2, P3, P4, H1, and P5 Tables from U.S. Census Bureau's 2020 Public Law 94-171 files
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DEMOLITION ANALYSIS

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CONSTRUCTION BUILDING DEBRIS

Materials	Total SF	Height	Cubic Yards	Pounds per Cub	Tons	Truck Capacity (CY)	Truck Trips	Source
Construction and Debris	0	0	-	484	-	10	-	Florida Department of Environmental Protection A Fact Sheet for C&D Debris Facility Operators
General Building		12	-	1,000	-	10	-	*Federal Emergency Management Agency, Debris Estimating Field Guide (FEMA 329), September 2010. General Building Formula*
Single Family Residence	-	12	-	1,000	-	10	-	Federal Emergency Management Agency. Debris Estimating Field Guide (FEMA 329), September 2010. Single Family Residence Formula, assumes 1 story, Medium vegetative cover multiplier (1.3)
Multi-Family Residence		12	-	1,000	-	10	-	
Mobile Home				1,000	-	10	-	
Mixed Debris			-	480	-	10	-	Florida Department of Environmental Protection A Fact Sheet for C&D Debris Facility Operators
Vegetative Debris (Hardwoods)			-	500	-	10	-	
Vegetative Debris (Softwoods)			-	333	-	10	-	
Asphalt or concrete (Constructior	28,500	0.5	528	2,400	633	10	106	
TOTAL			528		633		106	

TREE REPORT

REVIEWED BY
Hector Barrueles, Sr. Tree Superintendent
Urban Forestry Division
Reviewing Tree Report Only
Review of report does not indicate UFD approval for any tree removal
for
5/12/2025

PREPARED FOR

Public Storage

12681 W. Jefferson Blvd

Los Angeles, CA 90066

PROPERTY

12681 W Jefferson Blvd.

Los Angeles CA 90066

Per LADCP Form CP-4068:

Community Plan Area and Council District of Project: Palms - Mar Vista - Del Rey
CD 11 - Traci Park

Entitlement and Environmental Case Numbers:
CPC-2024-115-GPA-ZC-HD-CU-ZAA-SPR
ENV-2024-116-EAF

CONTACT

Adrian Helton

310.903.4003

ahelton@waremalcomb.com

April 21, 2025

PREPARED BY

LISA SMITH, THE TREE RESOURCE ®

REGISTERED CONSULTING ARBORIST #464

ISA BOARD CERTIFIED MASTER ARBORIST #WE3782BM

ISA TREE RISK ASSESSOR QUALIFIED - INSTRUCTOR

MEMBER OF AMERICAN SOCIETY OF CONSULTING ARBORISTS

P.O. BOX 49314, LOS ANGELES, CA 90049

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TREE REPORT

12681 W. Jefferson Blvd.
Los Angeles, CA 90066

SUMMARY

PROJECT OVERVIEW	
Site Address	**12681 W. Jefferson Blvd., Los Angeles, CA 90066**
Location and/or Specific Plan	**Palms - Mar Vista - Del Rey Community Plan**
APN's	**4211005017** **4211009025** **4211009028**
Project Description	**Redevelopment of existing self-storage facility**
Number of Protected Trees on Site	**0**
Number of Non-Protected Removals	**2**
Date of Site Inspection	**February 25, 2024**

This Tree Report was prepared at the request of the property owner, Public Storage, who is proposing to construct a new three-story plus basement mixed-use retail and mini-warehouse building. The subject property is approximately 141,627 square feet and is located in the Marina del Rey area of Los Angeles.

PROTECTED TREES, URBAN FORESTRY DIVISION

This property is under the jurisdiction of the City of Los Angeles and guided by the Native Tree Protection Ordinance No. 186873. **Protected Trees** are defined by this ordinance as oaks (*Quercus* sp) indigenous to California but excluding the scrub oak (*Quercus dumosa*); Southern California black walnut (*Juglans californica var. californica)*; Western sycamore (*Platanus racemosa*) and California bay laurel (*Umbellularia californica*) trees with a diameter at breast height (DBH) of four inches (4") or greater. **Protected Shrubs** are defined as Mexican elderberry (*Sambucus mexicana*); Toyon (*Heteromeles arbutifolia*) which measure four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the shrub.

There are NO trees or shrubs on this property that would be considered protected native within the City of Los Angeles Native Tree Protection Ordinance.

NEIGHBOR TREES

I have also inspected the neighboring properties to confirm there are no protected tree or shrub species that are adjacent to the construction zone, or in areas of impact.

CITY OF LOS ANGELES STREET TREES, URBAN FORESTRY DIVISION

At this time, I observed nine (9) Bronze Loquat **City of Los Angeles Street Trees** in the parkway perimeter of the property. These trees will receive no impact and will be retained.

NOTE: There was one additional Bronze Loquat Street Tree located in front of the subject property, but it declined and died and was removed by the city. The tree succumbed to a poor planting site, and asphalt placed inside the tree well, which reduced available natural rainwater percolation. Also, this site experiences a heat island and 2011-2022 was a mega-drought which affected thousands of city street trees.

NON-PROTECTED SIGNIFICANT TREES, DEPARTMENT OF CITY PLANNING

The Department of City Planning requires the identification of the location, size, type and condition of all existing trees on the site with a DBH of 8 inches (8") or greater. These trees will be identified as **Non-Protected Significant Trees.**

At this time, I observed two (2) **Non-Protected Significant Trees** on the property. One intentionally installed Western sycamore tree and one Jacaranda will be removed.

There are seven (7) Ginkgo trees on site that are below non-protected significant size and too small to be counted in the report. They are called out on the landscaping plan for reference.

Scope Of Work

The Scope of Work included:

- Field Observation and Inventory of Trees on Site
- Recommendations for the protection of trees to remain
- Photographs of the subject trees are included in Appendix B
- Matrix of proposed protected tree removals and protected trees to remain
- Evaluation of potential construction impacts
- A Tree Location Plot Map is included in Appendix A
- Protected tree construction impact guidelines

LIMITS OF THE ASSIGNMENT

The field inspection was a visual, grade level tree assessment. No special tools or equipment were used. No tree risk assessments were performed. My site examination and the information in this report is limited to the date and time the inspection occurred. The information in this report is limited to the condition of the trees at the time of my inspection.

TREE CHARACTERISTICS AND SITE CONDITIONS

Detailed information with respect to size, condition, species and recommendations are included in the Summary of Field Inspections in Appendix C. The trees are numbered on the Tree Location Map in Appendix A.

IMPACT ANALYSIS AND SPECIFIC RECOMMENDATIONS

NON-PROTECTED TREES

One (1) intentionally installed Western sycamore *(Platanus racemosa)* tree #11 on the property will be impacted by the proposed construction and is recommended for removal. The tree had embedded installation wires, staking marks as further evidence of this tree being intentionally installed. This tree is being interpreted as NOT PROTECTED due to it being intentionally installed. Since it is being interpreted as NOT PROTECTED, it will be replaced to the satisfaction of City Planning,

One (1) Jacaranda tree #10 will also be removed.

STREET PARKWAY TREES

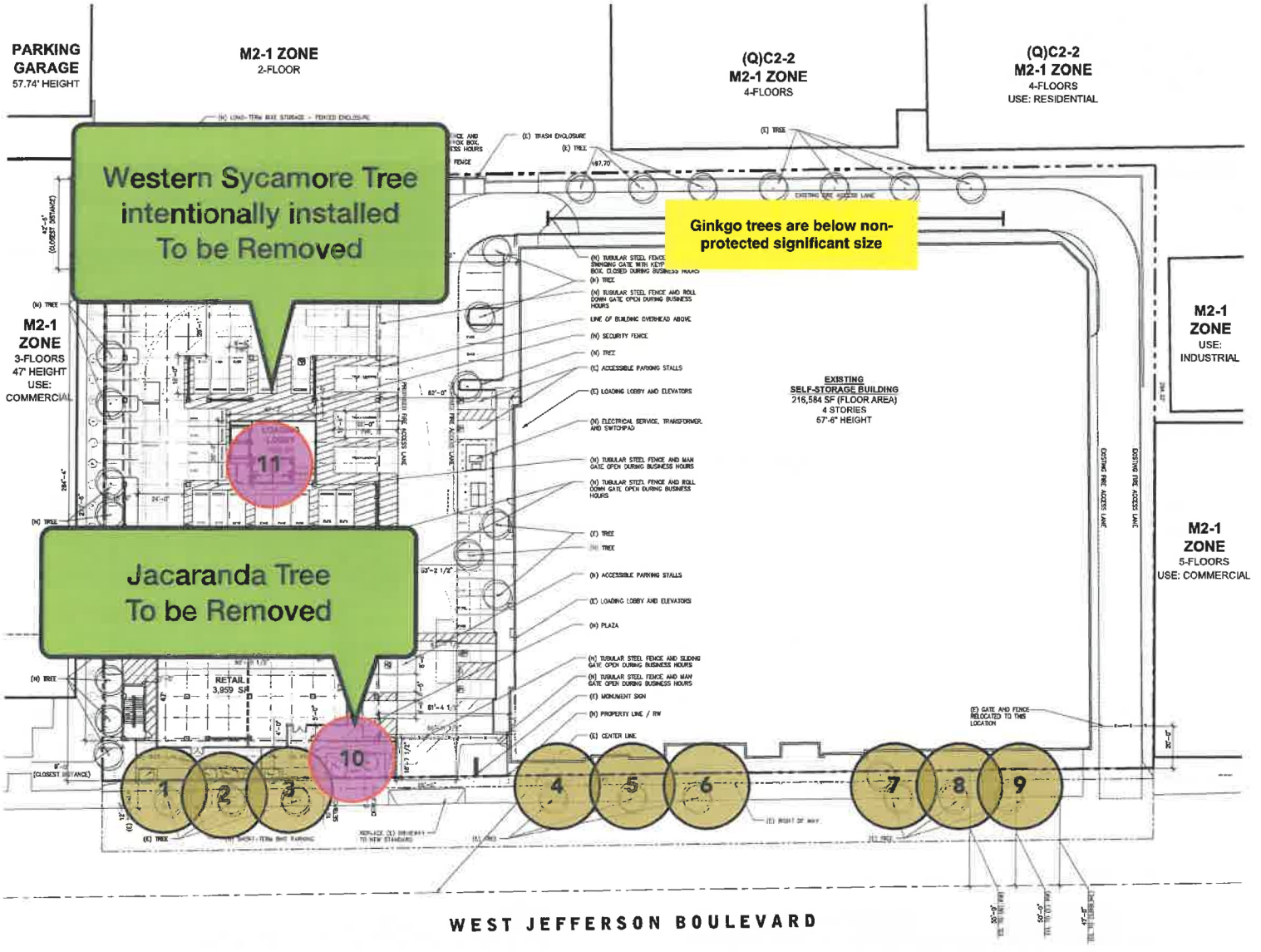
Nine (9) Bronze loquat (*Eriobotrya deflexa)* street trees #1 - #9 will receive no impact and will be retained and protected in place.

NOTE: There was one additional Bronze Loquat Street Tree located in front of the subject property, but it declined and died and was removed by the city. The tree succumbed to a poor planting site, and asphalt placed inside the tree well, which reduced available natural rainwater percolation. Also, this site experiences a heat island and 2011-2022 was a mega-drought which affected thousands of city street trees.

APPENDIX A.1 - TREE LOCATION - Aerial Map, REDUCED



APPENDIX A.2 - TREE LOCATION - Site Map, REDUCED



PROJECT SUMMARY	
Site Address	**12681 W. Jefferson Blvd.**
Location	**Marina del Rey**
Project Description	**Redevelopment of existing self-storage facility addition**

KEY

- Street Tree
- Non-Protected Significant Tree
- Tree recommended for removal

APPENDIX B - PHOTOGRAPHS



PHOTO 1 - Nine (9) Bronze loquat (*Eriobotrya deflexa)* street trees #1 - #9 will receive no impact and will be retained and protected in place.

APPENDIX B - PHOTOGRAPHS



PHOTO 2 - Nine (9) Bronze loquat (*Eriobotrya deflexa)* street trees #1 - #9 will receive no impact and will be retained and protected in place.

APPENDIX B - PHOTOGRAPHS



PHOTO 3 - Nine (9) Bronze loquat (*Eriobotrya deflexa)* street trees #1 - #9 will receive no impact and will be retained and protected in place.

APPENDIX B - PHOTOGRAPHS



PHOTO 4 - One (1) Jacaranda tree #10 will be removed.

APPENDIX B - PHOTOGRAPHS





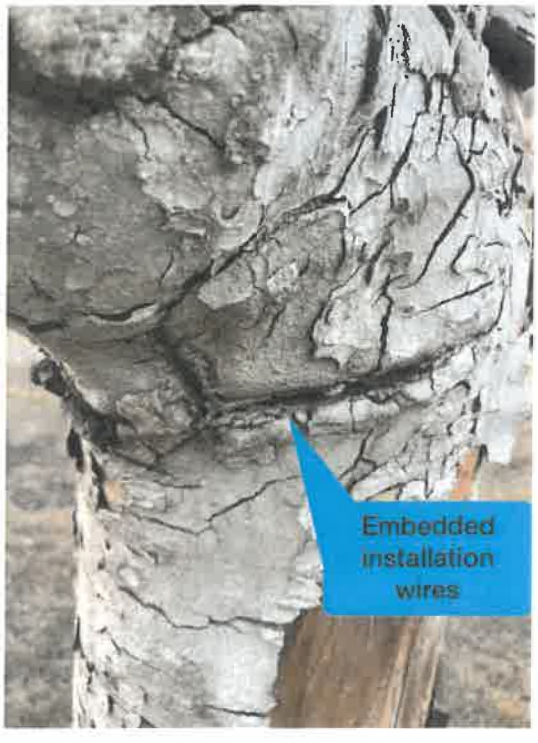


PHOTO 5 - Western sycamore *(Platanus racemosa)* tree #11 on the property will be impacted by the proposed construction and is recommended for removal. The tree had embedded installation wires, staking marks, and a landscape/irrigation plan as further evidence of this tree being intentionally installed. This tree is NOT PROTECTED due to it being intentionally installed, and therefore, it will be replaced at a 1:1 ratio per City requirements.

There were 5 Sycamore trees installed, and 4 of them died during the mega-drought prior to 2018. This is the only installed sycamore left, and it is impacted

APPENDIX B - PHOTOGRAPHS



PHOTO 6 - Western sycamore *(Platanus racemosa)* tree #11 on the property will be impacted by the proposed construction and is recommended for removal. The tree had embedded installation wires, staking marks, and a landscape/irrigation plan as further evidence of this tree being intentionally installed. This tree is NOT PROTECTED due to it being intentionally installed, and therefore, it will be replaced at a 1:1 ratio per City requirements.

There were 5 Sycamore trees installed, and 4 of them died during the mega-drought prior to 2018. This is the only installed sycamore left, and it is impacted

APPENDIX B - PHOTOGRAPHS



PHOTO 7 - There are seven (7) Ginkgo trees on site that are below non-protected significant size and too small to be counted in the report. They are called out on the landscaping plan for reference.

APPENDIX C - SUMMARY OF FIELD INSPECTION

Rating Code: A = Excellent, B = Good, C = Fair, D = Poor, E = Nearly Dead, F = Dead

Tree #	Species	Status	DBH (")	Height (')	Spread (')	Summary of Condition	Retain or Remove
1	Bronze loquat *Eriobotrya deflexa*	Street	8	15	15	C	Retain
2	Bronze loquat *Eriobotrya deflexa*	Street	9	15	15	C	Retain
3	Bronze loquat *Eriobotrya deflexa*	Street	10	15	15	C	Retain
4	Bronze loquat *Eriobotrya deflexa*	Street	8	15	15	C	Retain
5	Bronze loquat *Eriobotrya deflexa*	Street	8	15	15	C	Retain
6	Bronze loquat *Eriobotrya deflexa*	Street	8	15	15	C	Retain
7	Bronze loquat *Eriobotrya deflexa*	Street	8	15	15	C	Retain
8	Bronze loquat *Eriobotrya deflexa*	Street	8	15	15	C	Retain
9	Bronze loquat *Eriobotrya deflexa*	Street	8	15	15	C	Retain
10	Jacaranda *Jacaranda mimosifolia*	Non-Protected	8	20	20	C	Remove
11	Western Sycamore *Platanus racemosa*	Non-Protected Intentionally Installed	8	20	15	C - D	Remove

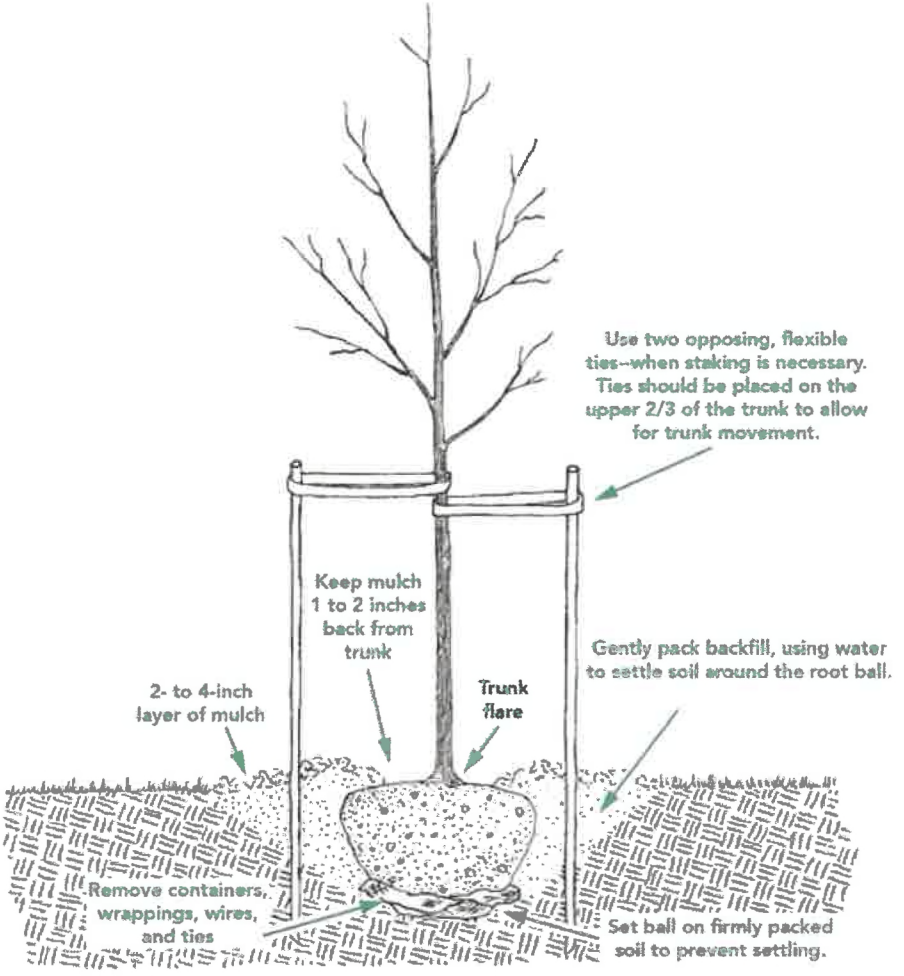
APPENDIX D - SUMMARY OF DATA

Table 2. Schedule of Proposed Removals

RECOMMENDATION

Tree #	Species	Status	Condition	Retain or Remove	Reason for Removal
10	Jacaranda *Jacaranda mimosifolia*	Non-Protected Intentionally installed	C-D	Remove	Construction Impact
11	Western Sycamore *Platanus racemosa*	Non-Protected Intentionally installed	C-D	Remove	Construction Impact

NEW TREE PLANTING



The ideal time to plant trees and shrubs is during the dormant season, in the fall after leaf drop or early spring before budbreak. Weather conditions are cool and allow plants to establish roots in the new location before spring rains and summer heat stimulate new top growth. Before you begin planting your tree, be sure you have had all underground utilities located prior to digging.

If the tree you are planting is balled or bare root, it is important to understand that its root system has been reduced by 90 to 95 percent of its original size during transplanting. As a result of the trauma caused by the digging process, trees commonly exhibit what is known as transplant shock. Containerized trees may also experience transplant shock, particularly if they have circling roots that must be cut. Transplant shock is indicated by slow growth and reduced vigor following transplanting. Proper site preparation before and during planting coupled with good follow-up care reduces the amount of time the plant experiences transplant shock and allows the tree to quickly establish in its new location. Carefully follow nine simple steps, and you can significantly reduce the stress placed on the plant at the time of planting.

NEW TREE PLANTING, continued

1. **Dig a shallow, broad planting hole.** Make the hole wide, as much as three times the diameter of the root ball but only as deep as the root ball. It is important to make the hole wide because the roots on the newly establishing tree must push through surrounding soil in order to establish. On most planting sites in new developments, the existing soils have been compacted and are unsuitable for healthy root growth. Breaking up the soil in a large area around the tree provides the newly emerging roots room to expand into loose soil to hasten establishment.

2. **Identify the trunk flare.** The trunk flare is where the roots spread at the base of the tree. This point should be partially visible after the tree has been planted (see diagram). If the trunk flare is not partially visible, you may have to remove some soil from the top of the root ball. Find it so you can determine how deep the hole needs for proper planting.

3. **Remove tree container for containerized trees.** Carefully cutting down the sides of the container may make this easier. Inspect the root ball for circling roots and cut or remove them. Expose the trunk flare, if necessary.

4. **Place the tree at the proper height.** Before placing the tree in the hole, check to see that the hole has been dug to the proper depth and no more. The majority of the roots on the newly planted tree will develop in the top 12 inches of soil. If the tree is planted too deeply, new roots will have difficulty developing because of a lack of oxygen. It is better to plant the tree a little high, 1-2 inches above the base of the trunk flare, than to plant it at or below the original growing level. This planting level will allow for some settling.

5. **Straighten the tree in the hole.** Before you begin backfilling, have someone view the tree from several directions to confirm that the tree is straight. Once you begin backfilling, it is difficult to reposition the tree.

6. **Fill the hole gently but firmly.** Fill the hole about one-third full and gently but firmly pack the soil around the base of the root ball. Be careful not to damage the trunk or roots in the process. Fill the remainder of the hole, taking care to firmly pack soil to eliminate air pockets that may cause roots to dry out. To avoid this problem, add the soil a few inches at a time and settle with water. Continue this process until the hole is filled and the tree is firmly planted. It is not recommended to apply fertilizer at time of planting.

7. **Stake the tree, if necessary.** If the tree is grown properly at the nursery, staking for support will not be necessary in most home landscape situations. Studies have shown that trees establish more quickly and develop stronger trunk and root systems if they are not staked at the time of planting. However, protective staking may be required on sites where lawn mower damage, vandalism, or windy conditions are concerns. If staking is necessary for support, there are three methods to choose among: staking, guying, and ball stabilizing. One of the most common methods is staking. With this method, two stakes used in conjunction with a wide, flexible tie material on the lower half of the tree will hold the tree upright, provide flexibility, and minimize injury to the trunk (see diagram). Remove support staking and ties after the first year of growth.

8. **Mulch the base of the tree.** Mulch is simply organic matter applied to the area at the base of the tree. It acts as a blanket to hold moisture, it moderates soil temperature extremes, and it reduces competition from grass and weeds. A 2- to 3-inch layer is ideal. More than 3 inches may cause a problem with oxygen and moisture levels. When placing mulch, be sure that the actual trunk of the tree is not covered. Doing so may cause decay of the living bark at the base of the tree. A mulch-free area, 1 to 2 inches wide at the base of the tree, is sufficient to avoid moist bark conditions and prevent decay.

TREE MAINTENANCE AND PRUNING

Some trees do not generally require pruning. The occasional removal of dead twigs or wood is typical. Occasionally a tree has a defect or structural condition that would benefit from pruning. Any pruning activity should be performed under the guidance of a certified arborist or tree expert.

Because each cut has the potential to change the growth of the tree, no branch should be removed without a reason. Common reasons for pruning are to remove dead branches, to remove crowded or rubbing limbs, and to eliminate hazards. Trees may also be pruned to increase light and air penetration to the inside of the tree's crown or to the landscape below. In most cases, mature trees are pruned as a corrective or preventive measure.

Routine thinning does not necessarily improve the health of a tree. Trees produce a dense crown of leaves to manufacture the sugar used as energy for growth and development. Removal of foliage through pruning can reduce growth and stored energy reserves. Heavy pruning can be a significant health stress for the tree.

Yet if people and trees are to coexist in an urban or suburban environment, then we sometimes have to modify the trees. City environments do not mimic natural forest conditions. Safety is a major concern. Also, we want trees to complement other landscape plantings and lawns. Proper pruning, with an understanding of tree biology, can maintain good tree health and structure while enhancing the aesthetic and economic values of our landscapes.

Pruning Techniques – From the I.S.A. Guideline

Specific types of pruning may be necessary to maintain a mature tree in a healthy, safe, and attractive condition.

Cleaning is the removal of dead, dying, diseased, crowded, weakly attached, and low- vigor branches from the crown of a tree.

Thinning is the selective removal of branches to increase light penetration and air movement through the crown. Thinning opens the foliage of a tree, reduces weight on heavy limbs, and helps retain the tree's natural shape.

Raising removes the lower branches from a tree to provide clearance for buildings, vehicles, pedestrians, and vistas.

Reduction reduces the size of a tree, often for clearance for utility lines. Reducing the height or spread of a tree is best accomplished by pruning back the leaders and branch terminals to lateral branches that are large enough to assume the terminal roles (at least one-third the diameter of the cut stem). Compared to topping, reduction helps maintain the form and structural integrity of the tree.

TREE MAINTENANCE AND PRUNING, continued

How Much Should Be Pruned?

Mature trees should require little routine pruning. A widely accepted rule of thumb is never to remove more than one-quarter of a tree's leaf-bearing crown. In a mature tree, pruning even that much could have negative effects. Removing even a single, large- diameter limb can create a wound that the tree may not be able to close. The older and larger a tree becomes, the less energy it has in reserve to close wounds and defend against decay or insect attack. Pruning of mature trees is usually limited to removal of dead or potentially hazardous limbs.

Wound Dressings

Wound dressings were once thought to accelerate wound closure, protect against insects and diseases, and reduce decay. However, research has shown that dressings do not reduce decay or speed closure and rarely prevent insect or disease infestations. Most experts recommend that wound dressings not be used.

DISEASES AND INSECTS

Continual observation and monitoring of your tree can alert you to any abnormal changes. Some indicators are: excessive leaf drop, leaf discoloration, sap oozing from the trunk and bark with unusual cracks. Should you observe any changes, you should contact a Tree specialist or Certified Arborist to review the tree and provide specific recommendations. Trees are susceptible to hundreds of pests, many of which are typical and may not cause enough harm to warrant the use of chemicals. However, diseases and insects may be indication of further stress that should be identified by a professional.

GRADE CHANGES

The growing conditions and soil level of trees are subject to detrimental stress should they be changed during the course of construction. Raising the grade at the base of a tree trunk can have long-term negative consequences. This grade level should be maintained throughout the protected zone. This will also help in maintaining the drainage in which the tree has become accustomed.

INSPECTION

The property owner should establish an inspection calendar based on the recommendation provided by the tree specialist. This calendar of inspections can be determined based on several factors: the maturity of the tree, location of tree in proximity to high-use areas vs. low-use area, history of the tree, prior failures, external factors (such as construction activity) and the perceived value of the tree to the homeowner.

Assumptions and Limiting Conditions

No warranty is made, expressed or implied, that problems or deficiencies of the trees or the property will not occur in the future, from any cause. The Consultant shall not be responsible for damages or injuries caused by any tree defects, and assumes no responsibility for the correction of defects or tree related problems.

The owner of the trees may choose to accept or disregard the recommendations of the Consultant, or seek additional advice to determine if a tree meets the owner's risk abatement standards.

The Consulting Arborist has no past, present or future interest in the removal or retaining of any tree. Opinions contained herein are the independent and objective judgments of the consultant relating to circumstances and observations made on the subject site.

The recommendations contained in this report are the opinions of the Consulting Arborist at the time of inspection. These opinions are based on the knowledge, experience, and education of the Consultant. The field inspection was a visual, grade level tree assessment.

The Consulting Arborist shall not be required to give testimony, perform site monitoring, provide further documentation, be deposed, or to attend any meeting without subsequent contractual arrangements for this additional employment, including payment of additional fees for such services as described by the Consultant.

The Consultant assumes no responsibility for verification of ownership or locations of property lines, or for results of any actions or recommendations based on inaccurate information.

This Arborist report may not be reproduced without the express permission of the Consulting Arborist and the client to whom the report was issued. Any change or alteration to this report invalidates the entire report.

Should you have any further questions regarding this property, please contact me at (310) 663-2290.

Respectfully submitted,





Lisa Smith

Registered Consulting Arborist #464
ISA Board Certified Master Arborist #WE3782BM
ISA Tree Risk Assessor Qualified- Instructor
American Society of Consulting Arborists, Member

APPLICATIONS

TREE DISCLOSURE STATEMENT

Los Angeles Municipal Code (LAMC) Section 46.00 requires disclosure and protection of certain trees located on private and public property, and that they be shown on submitted and approved site plans. Any discretionary application on a property that includes changes to the building footprint or any other change to the areas of the property not currently built upon or paved, including demolition, grading, or fence permit applications, or any discretionary change that could potentially remove or affect trees or shrubs, shall provide a Tree Disclosure Statement completed and signed by the Property Owner.

If the Tree Disclosure Statement indicates that there are any protected trees or protected shrubs on the project site and/or any trees within the adjacent public right-of-way that may be impacted or removed as a result of the project, a Tree Report (CP-4068) will be required, and the field visit must be conducted by a qualified Tree Expert, prepared and conducted within the last 12 months.

Property Address: 12681 W. Jefferson Blvd, LA, CA 90066

Date of Field Visit: February 25, 2024

Does the property contain any of the following protected trees or shrubs?

☐ **Yes** (Mark any that apply below)

- ☐ Oak, including Valley Oak *(Quercus lobota)* and California Live Oak (*Quercus agrifolia*) or any other tree of the oak genus indigenous to California, but excluding the Scrub Oak
- ☐ Southern California Black Walnut (*Juglans californica*)
- ☐ Western Sycamore (*Platanus racemosa*)
- ☐ California Bay (*Umbellularia californica*)
- ☐ Mexican Elderberry (*Sambucus mexicana*)
- ☐ Toyon (*Heteromeles arbutifolia*)

☑ **No**

Does the property contain any street trees in the adjacent public right-of-way?

☑ **Yes** ☐ **No**

Does the project occur within the Mt. Washington/Glassell Park Specific Plan Area and contain any trees 12 inches or more diameter at 4.5 feet above average natural grade at base of tree and/or is more than 35 feet in height?

☐ **Yes** ☑ **No**

Does the project occur within the Coastal Zone and contain any of the following trees?

☐ **Yes** (Mark any that apply below)

- ☐ Blue Gum Eucalyptus *(Eucalyptus globulus)*
- ☐ Red River Gum Eucalyptus *(Eucalyptus camaldulensis)*
- ☐ Other Eucalyptus species

☑ **No**

Have any trees or shrubs been removed in the last two years?

☑ **Yes** ☐ **No**

If Yes, were any protected species (as listed in Ordinance No. 186,873)?

☐ **Yes** ☐ **No**

If Yes, provide permit information: _____

Tree Expert Credentials (if applicable)

Name of Tree Expert: Lisa Smith - Registered Consulting Arborist #464

Mark which of the following qualifications apply:

- ☐ Certified arborist with the International Society of Arboriculture who holds a license as an agricultural pest control advisor
- ☐ Certified arborist with the International Society of Arboriculture who is a licensed landscape architect
- ☑ Registered consulting arborist with the American Society of Consulting Arborists

Certification/License No.: Consulting Arborist #464, Certified Master Arborist #WE3782BM

Owner's Declaration

I acknowledge and understand that knowingly or negligently providing false or misleading information in response to this disclosure requirement constitutes a violation of the Los Angeles Municipal Code Section 46.00, which can lead to criminal and/or civil legal action. I certify that the information provided on this form relating to the project site and any of the above trees and/or biological resources is accurate to the best of my knowledge.

Name of the Owner (Print) Kristofer Golder, VP of Dev. PS

Owner Signature Kristofer Golder Date 4/22/25

REFERRAL FORM

URBAN FORESTRY REFERRAL – PILOT PROGRAM

Pre-Filing Requirement

This form shall be required if there are any protected trees or protected shrubs on the project site and/or or any trees within the adjacent public right-of-way that may be impacted or removed as a result of the project (e.g., any changes to the building footprint, including construction, demolition, or grading), and the project meets one or more of the following criteria:

- ☐ Located within the Mt. Washington/Glassell Park Specific Plan
- ☐ SB 9 Urban Lot Split, Preliminary Parcel Map, or Tentative Tract Map, located within the Valley geography
- ☐ Qualifies for the Executive Directive 1 (ED 1) Ministerial Approval Process[1]
- ☐ Utilizes the Transit Oriented Communities (TOC) Affordable Housing Incentive Program[2]
- ☑ Other projects as determined by City Planning,

If required, the applicant shall complete the following **PRIOR TO FILING AN APPLICATION**:

1. Complete the Tree Disclosure Statement (CP-4067).
2. Prepare a Tree Report in accordance with the Tree Report Template (CP-4068). If using an existing Tree Report, it must be prepared within 12 months of submission.
3. Submit the Urban Forestry Referral Form (Referral Form), Tree Disclosure Statement, and Tree Report to the Customer Service Request Portal for Urban Forestry Division Clearances. An Angeleno Account will be required.

The completed Referral Form signed by Urban Forestry staff shall be submitted with case filing materials.

Post-Filing Requirement

If a project is identified as requiring this form after a case has been filed, in addition to the above materials, provide the following information:

Case Number: ENV-2024-116-MND/CPC-2024-115-GPA-ZC-HD-CU-ZAA-SPR

Planning Staff Name: Kenton Trinh - City Planning Associate

Planning Staff Email: kenton.trinh@lacity.org

[1] Refer to the Executive Directive 1 Implementation Guidelines for qualifying criteria
[2] For more information, refer to the TOC Guidelines

THIS SECTION TO BE COMPLETED BY THE APPLICANT

Project Site Address: 12681 W. Jefferson Boulevard, LA, CA, 90066

Description of Proposed Project: Proposed new mixed-used building with 82,324 SF of floor area, including 3,959 SF of retail uses and 78,365 SF of mini-warehouse uses.

THIS SECTION TO BE COMPLETED BY CITY STAFF ONLY

URBAN FORESTRY PRELIMINARY EVALUATION

Protected Trees and Protected Shrubs

☑ **Ready to File.** No changes required at this time.

☐ **Ready to File with Modifications.** See attached **Tree Protection Plan** (if applicable, include any Notices to Comply [NTCs]).

☐ **Not Ready to File.** See Urban Forestry Comments below. Note that filing with this box checked will result in delays in case processing.

Trees within the Public Right-of-Way

☑ **Ready to File.** No changes required at this time.

☐ **Ready to File with Modifications.** See attached **Tree Protection Plan** (if applicable, include any NTCs or Street Tree Notices [STNs]).

☐ **Not Ready to File.** See Urban Forestry Comments below. Note that filing with this box checked will result in delays in case processing.

Urban Forestry Comments

There are no protected trees. There is one dead street tree that will be removed but the rest of the street trees will not be impacted.

Urban Forestry Staff Signature: Miguel Ornelas

Print Name: MIGUEL ORNELAS **Review Date:** 5/12/2025

☐ Additional Documents Attached

☐ Additional Consultation required by:

☐ Bureau of Engineering ☐ Department of Transportation

CONFIDENTIAL

CULTURAL RESOURCES RECORD SEARCH



YELLOW

Geotechnical Engineering Exploration and Analysis

Proposed Public Storage 3-Story Building with Basement
12681 W. Jefferson Boulevard
Los Angeles, California

Prepared for:

Public Storage
Glendale, California

February 20, 2020
Revised March 20, 2024
Project No. 2G-1806003-R.2

GILES
ENGINEERING ASSOCIATES, INC.

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ENGINEERING ASSOCIATES, INC.
GEOTECHNICAL, ENVIRONMENTAL & CONSTRUCTION MATERIALS CONSULTANTS

• Dallas, TX
• Los Angeles, CA
• Manassas, VA
• Milwaukee, WI

February 20, 2020
Revised March 20, 2024

Public Storage, Inc.
701 Western Avenue
Glendale California 91201

Attention: Ms. Cherry Miao
Development Manager

Subject: Geotechnical Engineering Exploration and Analysis
Proposed Public Storage 3-Story Building with Basement
12681 W. Jefferson Boulevard
Los Angeles, California
Project No. 2G-1806003-R.2

Dear Mr. Friedman:

In accordance with your request and authorization, a *Geotechnical Engineering Exploration and Analysis* report has been prepared for the above-referenced project. Conclusions and recommendations developed from the exploration and analysis are discussed in the accompanying report.

We appreciate the opportunity to be of service on this project. If we may be of additional assistance, should geotechnical related problems occur or to provide construction observation and testing services, please do not hesitate to call at any time.

Respectfully submitted,

GILES ENGINEERING ASSOCIATES, INC.

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12681 W. JEFFERSON BOULEVARD
LOS ANGELES, CALIFORNIA
PROJECT NO. 2G-1806003-R.2

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GEOTECHNICAL ENGINERING EXPLORATION AND ANALYSIS

PROPOSED PUBLIC STORAGE 3-STORY BUILDING WITH BASEMENT
12681 W. JEFFERSON BOULEVARD
LOS ANGELES, CALIFORNIA
PROJECT NO. 2G-1806003-R.2

EXECUTIVE SUMMARY OUTLINE

Subsurface Conditions

- Site Class designation D is recommended for seismic design considerations.
- Our review of the *Geologic Map of the Venice Quadrangle* within the Seismic Hazard Zone Report for the Venice Quadrangle indicated that the subject site is underlain by Young Alluvial Fan Deposits consisting generally of fine to medium grained sand with silt and clay layers.
- Fill and possible fill materials were encountered within our exploratory test borings to depths of about 3 ½ to 5 feet below existing grades. These materials were generally noted to be damp to moist, medium stiff sandy silt, and clayey silt, and damp to very moist, loose to firm, clayey sand and silty sand.
- Native soils encountered underneath the fill and possible fill material generally consisted of alternating layers of sand, silt, and clay, with variable relative densities and comparative consistencies.
- Groundwater was encountered within our test borings, and slug test holes, during our subsurface investigation at depths of about 15 to 25 feet below grade (El. 1.3 to El. -10 feet). The historic high groundwater elevation for the site is about 7 feet below grade as determined from the maps available in the Seismic Hazard Zone Report for this area.

Site Development

- The project includes a new 3-story building with a full, 1-story basement, and new drive and parking areas, and site work including an underground water storage system
- Excavation is anticipated to extend to maximum depths of 12 inches below the bottom of basement mat foundations, resulting in excavation depths up to about 18 feet ± below grade, or Elevation (El.) 3.8 feet. The soils exposed at the base of this recommended over-excavation should be examined by the geotechnical engineer to document that all other unsuitable soils have been removed. Prior to placement of fill, the exposed surfaces approved for fill placement should be scarified to an approximate depth of at least 6 to 8 inches, moisture conditioned (air-dried) and recompacted to a minimum relative compaction of at least 90% of the maximum dry density as determined by Modified Proctor (ASTM D 1557-00). A representative of the project geotechnical consultant should be present on-site during grading operations to verify proper placement and adequate compaction of all fills.
- Following scarification and recompaction, ½ to ¾-inch open-graded, crushed aggregate, 12 inches in minimum thickness, for the dewatering and methane system is recommended.

Building Foundation

- The proposed structure may be supported by a mat foundation supported on the prepared subgrade, designed for a maximum, net allowable soil bearing pressure of 1,500 pounds per square foot (psf), or a maximum modulus of subgrade reaction (k_s) of 35 pounds per square inch per inch (psi/in.).
- Steel reinforcing should be designed by the structural engineer.

Building Mat Foundation

- The ground floor of the new building may be designed as a load-bearing mat.
- The mat will be underlain by the methane and sub-drainage system granular base, planned at 12-inch thick, supported on a properly prepared subgrade.
- A special vapor/methane barrier is recommended below the mat foundation installed per manufacturer's specifications.

Pavement

- Asphaltic Concrete: 3 ½ inches of asphaltic concrete underlain by 7 or 10 inches of Class 2 aggregate base in parking stall and drive lane areas, respectively.
- Portland Cement Concrete: 6 inches in thickness in high stress areas such as entrance/exit aprons lane and in trash enclosure loading zone underlain by 4 inches of Class 2 aggregate base.

Special Considerations

- Some of the near surface soils have in-situ moisture contents that were very moist and above the optimum moisture content to an extent that may create difficulties in achieving the required compaction. Therefore, significant air-drying or import soil may be required.
- A shoring system may be required, if site soils are not able or desired to be sloped during construction due to property line, utilities, or existing building/site access.
- Retaining walls, free standing, or combined with the building basement walls will be required for the site.
- The site is located within a zone requiring methane gas remediation system. A combined dewatering and methane system is recommended.

Construction Considerations

- According to the ALTA Map provided, date May 26, 1999, the southwest corner of the site in the area of the planned building basement area previously had a 2-story residence, barn and shed. Other shallow, on-site structures, such as above-ground tanks, pavements, sheds, cages, were also noted to be previously on-site within the planned building and pavement areas.

YELLOW – This site has been given a yellow designation due to increased costs associated with the excavation and removal of overly moist soil for the basement, temporary or permanent shoring, retaining walls, the installation of the methane mitigation, future dewatering system, and overexcavation possibly required due to previous structures, especially in the southwest corner of the building area.

1.0 SCOPE OF SERVICES

This report provides the results of the *Geotechnical Engineering Exploration and Analysis* that Giles Engineering Associates, Inc. ("Giles") conducted at the subject site. This study included several separate, but related, service areas referenced hereafter as the Geotechnical Subsurface Exploration Program, Geotechnical Laboratory Services, and Geotechnical Engineering Services. The scope of each service area was narrow and limited, as directed by our client and in consideration of future site development. The scope of each service area is briefly explained in this report.

The purpose of this geotechnical study is to evaluate subsurface soil conditions and to provide geotechnical recommendations for the design and construction of the proposed site development, including design and construction of the foundation, ground bearing mat, pavement, and retaining walls. Our report includes a description of the work performed at the site, a discussion of the geotechnical condition and concerns observed, and recommendations developed from our engineering analysis of field and laboratory data.

Giles has conducted a L*imited Phase II Environmental Site Assessment and Methane Assessment* for the subject site, submitted under separate cover on November 29, 2018, Project No. 2E-1809004.

2.0 SITES AND PROJECT DESCRIPTION

The project includes a new 3-story building, above ground, with a full 1-story basement, new drive and parking areas, and site work including an underground water storage system. The site is located at 12681 West Jefferson Boulevard, in the City of Los Angeles, California. The western area of the site is vacant with the eastern area developed with a 4-story, Public Storage building and parking lot outside the limits of the planned improvements. The site is bounded by commercial buildings to the north, west, and east, and West Jefferson Boulevard to the south. For this report, Project North is considered perpendicular to West Jefferson Boulevard.

Based on the site elevations from the available Precise Grading Plans, prepared by DRC Civil Engineering/Land Surveying/Land Planning, dated September 9, 2019, and current elevations within the proposed building pad area range from about Elevation 17.5 feet at the south area of the proposed building to Elevation 23 at the north area of the building. The planned finished first floor is Elevation (El.) 17.5 feet and the planned basement finished floor is El. 6.8 feet. Therefore, excavations of about 11 to 17 feet are expected to achieve the finish basement subgrade elevation, not considering possible overexcation requirements. It is our understanding that the civil plans will be updated following the issuance of this report, with minimal, if any, grade changes. Giles should review any plans issued following this report.

According to the ALTA Map provided, the site in the area of the building pad previously had a 2-story residence, barn and shed, in the southwest corner of the planned building. The site grades as determined from the ALTA Survey indicated the site slopes about 1 foot up toward the north and is level with the adjacent sidewalk to the south.

The new building is understood to be supported by interior and exterior columns on a 10 x 10 foot grid, with first floor spans up to a 30 x 30 foot grid, extending to the basement level in the northern area where a first floor parking structure is planned, and some 10 x 30 foot spans. The interior column loads are understood to be 164 kips for the 10 by 30 foot spacing, and 491 kips for the 30 by 30 foot spacing based on loading details provided by the structural engineer. If the final structural loading changes that should be provided to Giles to determine if revisions to the recommendations contained in this report are necessary. The client indicated a mat foundation system is preferred for this project.

The traffic loading on the proposed parking lot improvement is understood to predominantly consist of automobiles with occasional heavy trucks. The parking lot pavement sections have been designed on the basis of daily traffic intensity equivalent to five equivalent 18-kip single axle loads and 1,500 automobiles within the main drive lanes and only automobiles of a lesser intensity within the parking stalls. Pavement designs are based on a 20-year design period. Therefore, the parking lot pavement sections have been designed on the basis of a Traffic Index (TI) of 4.5 for the automobile traffic parking stalls (light duty) and a TI of 5.5 for drive lane areas (medium to heavy duty). The existing parking lot area is generally in good condition.

3.0 SUBSURFACE EXPLORATION

3.1 Subsurface Exploration

Our subsurface exploration consisted of the drilling of nine (9) test borings (B-1 to B-9) to depths of 5 to 66 ½ feet below existing ground surfaces utilizing a truck mounted drill rig with hollow stem augers. The deeper borings (66 ½ feet) were performed to determine soil parameters at deeper layers and the potential for liquefaction at the subject site. The approximate test boring locations are shown in the Test Boring Location Plan (Figure 1). Two of the borings, B-2 and B-5, were converted to percolation tests, P-2 and P-1, respectively. To determine the permeability of the soil at specific depths, two slug tests (S-1 and S-2) were performed. The Test Boring Location Plan and Test Boring Logs (Records of Subsurface Exploration) are enclosed in Appendix A. Field and laboratory test procedures and results are enclosed in Appendix B and C, respectively. The terms and symbols used on the Test Boring Logs are defined on the General Information in Appendix D.

Our subsurface exploration was performed in accordance with procedures in Appendix B of this report and included the collection of relatively undisturbed samples and bulk samples consisting of composite soil materials obtained at selected depth intervals from the borings. Relatively undisturbed samples were collected using a 3-inch outside-diameter, modified California split-spoon soil sampler (CS) lined with 1-inch high brass rings. The central portions of the driven core samples were placed in sealed containers and transported to our laboratory for testing. Soil samples were also collected within the borings with Shelby tubes, 30 inches in length and 3 inches in diameter, in accordance with ASTM 1587.

Where deemed appropriate, standard split-spoon tests (SS), also called Standard Penetration Tests (SPT), were also performed at selected depth intervals in accordance with the American Society for Testing Materials (ASTM) Standard Procedure D 1586. Disturbed soil samples from the unlined standard split-spoon samplers were placed in jars and transported to our laboratory for testing.

At the conclusion of drilling activities, each borehole was backfilled. Even with this service, however, it is important to note that some boreholes backfill settlement or expansion can and will occur over time. This settlement/expansion can create a hazard and should be carefully monitored by the client and/or property owner. The settlement/expansion can lead to the formation of a "trip joint" representing a threat of injury to persons or animals utilizing or accessing the subject property. Giles has not included a cost for monitoring borehole settlement/expansion after the initial drilling activities and will not be performing this service.

3.2 Subsurface Conditions

The subsurface conditions as subsequently described have been simplified somewhat for ease of report interpretation. A more detailed description of the subsurface conditions at the test boring locations is provided by the logs of the test borings enclosed in Appendix B of this report.

Soil

Our review of the *Geologic Map of the Venice Quadrangle* within the Seismic Hazard Zone Report for the Venice Quadrangle indicated that the subject site is underlain by Young Alluvial Fan Deposits consisting generally of fine to medium grained sand with silt and clay layers.

Fill and possible fill materials were encountered within our exploratory test borings to depths of about 3 ½ to 5 feet below existing grades. These materials were generally noted to be damp to moist, medium stiff sandy silt, and clayey silt, and damp to very moist, loose to firm, clayey sand and silty sand.

Native soils encountered underneath the fill and possible fill material generally consisted of alternating layers of sand, silt, and clay, with variable relative densities and comparative consistencies.

Groundwater

Groundwater was encountered within our test borings, and slug test holes, during our subsurface investigation at depths of about 15 to 25 feet below grade (El. 1.3 to El. -10 feet). The historic-high groundwater depth for the site is about 7 feet below grade as determined from the maps available in the Seismic Hazard Zone Report for this area. Fluctuations of the groundwater table, localized zones of perched water, and rise in soil moisture content should be anticipated during and after the rainy season. Irrigation of landscape areas on or adjacent to the site could also cause fluctuations of local or shallow perched groundwater levels.

3.3 Percolation Testing

It is our understanding that an on-site below grade storm water infiltration system was being considered for the site. Two percolation tests (P-1 and P-2) were conducted at the northern and southern portions of the site (Figure 1) and involved the drilling of test borings about 8 inches in diameter to depths of about 5 feet below existing grade. Within the drilled test holes gravel, about 2 inches in thickness, was placed at the bottom of the test holes, then a two-inch diameter perforated PVC pipe was installed inside the boring and pea gravel was used as filter pack around the outside diameter of the pipe. Testing involved presoaking the test holes and then filling the test holes with water, and recording the drop in the water surface. After pre-soaking, successive test water was added to the casing to a minimum depth of 1 foot above the bottom of the casing and refilled to this level after each consecutive percolation test reading. The drop in water level over time is the pre-adjusted percolation rate at the test location. The pre-adjusted percolation rate was reduced to account for the discharge of water from both the sides and bottom of the boring. The formula given by the County of Los Angeles, Department of Public Works, Geotechnical and Materials Engineering Division, was used to calculate the infiltration rate.

Infiltration Rate = Pre-adjusted Percolation Rate divided by Reduction Factor.

Where the reduction factor (R_f) is given by:
$R_f = (2di - \Delta d/ dia) + 1$

With: di = initial water depth (in.)
Δd = average/final water level drop (in.)
Dia = diameter of the boring (in.)

The calculated infiltration rate was also adjusted to reflect a correction factor of 3 applied to the rate obtained from the infiltration test result and are summarized below. The calculated infiltration rates are summarized below.

TABLE 1 – PERCOLATION TEST RESULTS

Test Hole	Test Depth[1] (feet)	Percolation Rate (in/hr)	Infiltration Rate [2] (in/hr)	Soil Type
B-5/P-1	5.0	1.92	0.04	Silt, some fine Sand and Gravel
B-2/P-2	5.0	0.96	0.08	Silty fine Sand

1) Depth is referenced to the existing surface grade at the test location.
2) Infiltration Rate reflects FS of 3.

It should be noted that the infiltration rate of the site soils represents a specific area and depth tested and may fluctuate throughout other parts of the site.

4.0 LABORATORY TESTING

Several laboratory tests were performed on selected samples considered representative of those encountered in order to evaluate the engineering properties of the on-site soils. The following are brief descriptions of our laboratory test results.

In Situ Moisture and Density

Tests were performed on select samples from the test borings to determine the subsoils dry density and natural moisture contents in accordance with Test Method ASTM D 2216. The results of these tests indicated generally moist conditions in the upper five feet. In place moisture and density test results are included in the Test Boring Logs enclosed in Appendix A.

Sieve Analysis

Sieve Analyses were performed on selected samples from the test borings to assist in soil classification. These tests were performed in accordance with Test Method ASTM D 422 and ASTM D 1140. The results of the Sieve tests are presented in Test Boring Logs in Appendix A.

Expansive Potential

To evaluate the expansive potential of the near surface soils encountered during our subsurface exploration, a composite sample collected from Test Boring B-1, B-3, B-4 and B-5 (0 to 5 feet) was subjected to Expansive Index (EI) testing in accordance with Test Method ASTM D 4829. The result of our expansion index (EI) test indicates that the near surface sample has a very low expansion potential (EI = 9).

Atterberg Limits

The Atterberg limits (liquid limit, plastic limit and plasticity index) were determined for representative samples of the fine grained on-site soils in accordance with Test Method ASTM D 4318. The results of the Atterberg Limits are included on the test borings enclosed in Appendix A.

Consolidation

Settlement, collapse, and swell predictions under anticipated loads were made on the basis of a one-dimensional consolidation tests. The tests were performed in general conformance with Test Method ASTM D 2435 and ASTM D 5333. Loads were applied in a geometric progression by doubling the previous load, and the resulting deformations were recorded at selected time intervals. The results of the consolidation test are graphically presented in the figures in Appendix A.

Direct Shear

The angle of internal friction and cohesion were determined for relatively undisturbed soil samples by means of direct shear tests. These tests were performed in general accordance with Test Method ASTM D 3080. Three specimens were prepared for each test. The test specimens were saturated and then sheared under normal loads at a constant rate of strain. Results are presented on the figures in Appendix A.

Soluble Sulfate Analysis and Soil Corrosivity

A representative composite sample of the near surface soils which may contact shallow buried utilities and structural concrete was tested to determine the corrosion potential for buried ferrous metal conduits and the concentrations present of water soluble sulfate which could result in chemical attack of cement. The following table presents the results of our laboratory testing.

Parameter	**B-1,3,4, and 5 0 to 5 feet**
pH	7.31
Chloride	91 ppm
Sulfate	0.0072%
Resistivity	2,300 ohm-cm

The chloride content of near-surface soils was determined for a selected sample in accordance with California Test Method No. 422. The results of this test indicate that the on-site soils have a **low exposure** to chloride. The results of testing of soil pH and resistivity were determined in accordance with California Test Method No. 643. The test results for pH indicated the **tested soil was neutral**.

These test results have been evaluated in accordance with criteria established by the Cast Iron Pipe Research Association, Ductile Iron Pipe Research Association, the American Concrete Institute and the National Association of Corrosion Engineers. The test results on a near surface bulk sample from the site generally indicate that the tested on-site soils have **moderate corrosive potential** when in contact with ferrous materials. We recommend that a corrosion engineer review these results in order to provide specific corrosion protection as well as other protection for other buried metal materials.

Corrosivity testing also included determination of the concentrations of water-soluble sulfates present in the tested soil sample in accordance with California Test Method No. 417. Our laboratory test data indicated that near surface soils contain approximately 0.0072 percent of water soluble sulfates. Based on the 2022 California Building Code (CBC), concrete that may be exposed to sulfate containing soils shall comply with the provisions of ACI 318, Section 4.3. Therefore, according to Table 4.3.1 of the ACI 318 a **negligible exposure to sulfate** can be expected for concrete placed in contact with the tested on-site soils. No special sulfate resistant cement is considered necessary for concrete which will be in contact with the tested on-site soils.

Photoionization Detector (PID) Screening

Soil samples taken from our subsurface exploration were screened with a Photoionization Detector (PID) to check for the possible presence of volatile vapors. **No volatile vapors were detected during the screening of soil samples collected from any of the borings with a PID.** Additionally, no odors were detected or stains observed that might suggest some form of contamination. PID field-screening results are included on the soil boring logs.

5.0 GEOLOGIC AND SEISMIC HAZARDS

5.1 Active Fault Zones

The project site is located in the highly seismic Southern California region within the influence of several fault systems. However, **the site does not lie within the boundaries of an Earthquake Fault Zone as defined by the State of California in the Alquist-Priolo Earthquake Fault Zoning Act.** The potential for fault rupture through the site is, therefore, considered to be low. The site may however be subject to strong groundshaking during seismic activity. The proposed structure should be designed in accordance with the current version of the 2022 CBC and applicable local codes. **Based upon the encountered subsurface soils, a Site Class D is recommended for design.**

5.2 Seismic Hazard Zones

Our review of the published Seismic Hazard Evaluation Report for the Venice Quadrangle, within which the subject site is located, indicates that **the subject site is within a designated Liquefaction Hazard Zone**. A liquefaction analysis has therefore been performed.

General types of ground failures that might occur as a consequence of severe ground shaking typically include ground lurching and shallow ground rupture. The probability of occurrence of each type of ground failure depends on the severity of the earthquake, distance from faults, topography, subsoils and groundwater conditions, in addition to other factors. Based on our subsurface exploration and the seismic designation for this site, all of the above effects of ground failure due to seismic activity are considered unlikely at the site.

5.3 Landslide Hazards

The subject site does not lie within a mapped Landslide Hazard Zone based on our review of the published Seismic Hazard Evaluation Report for the Venice Quadrangle**. Since the subject site is not located near an unstable slope, mitigation of landslide hazards is not necessary for the site.**

6.0 CONCLUSIONS AND RECOMMENDATIONS

Based on the results of our subsurface exploration and laboratory testing, development for the subject site with the proposed project is considered feasible from a geotechnical point of view provided the following conclusions and recommendations are incorporated in the design and project specifications.

From a soils engineering point of view, the subject property is considered geotechnically suitable for the proposed new improvements provided the following recommendations are incorporated in the design and construction of the project.

We recommend that Giles Engineering Associates, Inc. be involved in the review of the grading and foundation plans for the site to ensure our recommendations are interpreted correctly. Based on the results of our review, modifications to our recommendations or the plans may be warranted.

Effect of Proposed Grading and Construction on Adjacent Property

It is our opinion that the proposed construction and grading will be safe against geotechnical hazards from landslides, settlement, or slippage and the proposed work will not adversely affect the geologic stability of the adjacent property provided grading and construction are performed in

compliance with the local city code and in accordance with the recommendations presented herein.

6.1 Seismic Design Considerations

Faulting/Seismic Design Parameters

According to the maps of known active fault near-source zones the Newport Inglewood and Santa Monica faults are the closest known active faults and are located about 3.2 and 4.5 miles from the site, respectively. These faults would probably generate the most severe site ground motions at the site with an anticipated maximum moment magnitude (Mw) of 6.3, as determined from deaggregation analysis from the USGS website.

The proposed structure should be designed in accordance with the current versions of the: *California Building Code (CBC)*, *Minimum Design Loads and Associated Criteria for Buildings and Other Structures ASCE 7*, and applicable local codes. The following values are determined by using the web-based SEAOC/OSHPD Seismic Design Map Tool based upon the *CBC 2022* and *ASCE 7-16*.

CBC 2022, Earthquake Loads	
Site Class Definition (Section 1613.2.2)	D
MCER, S_s ,Determined in Section 1613.2.1 for 0.2 second)	1.867
MCER, S_1 Determined in Section 1613.2.1 for 1.0 second)	0.658
Site Coefficient, F_a (Table 1613.2.3 (1) short period)	1.0
Site Coefficient, F_v (Table 1613..2.3 (2) 1-second period)	1.7
Site Modified Spectral Acceleration Value, S_{MS} (Eq. 16-36)	1.867
Site Modified Spectral Acceleration Value, S_{M1} (Eq 16-37)	1.119
Design Spectral Response Acceleration Parameter, S_{DS} (Eq. 16-38)	1.245
Design Spectral Response Acceleration Parameter, S_{D1} (Eq. 16-39)	0.746

According to Section 11.4.7 of ASCE 7-16, a ground motion hazard analysis is required and be performed in accordance with Section 21.2 for structures on Site Class D with S_1 greater than or equal to 0.2. However, as an exception of performing the ground motion hazard analysis, provided that the value of the Seismic Response Coefficient (Cs) is determined by Equation (12.8-2) for values of the fundamental period of the building (T) ≤ 1.5Ts, and taken as 1.5 times the value computed in accordance with either Equation (12.8-3) for $T_L \geq 1.5Ts$, or Equation (12.8-4) for $T > T_L$.

Liquefaction

The *Seismic Hazard Zone Report for the Venice Quadrangle* published by the California Geological Survey (CGS) indicates this site is within a zone that is potentially liquefiable and therefore requires a liquefaction study. Accordingly, a detailed liquefaction analysis was performed.

The liquefaction analysis was performed utilizing the computer software program LiquefyPro and based on the 2022 CBC, California Geological Survey (CGS) Special Publication 117A, and additional City of Los Angeles (CLA) requirements for liquefaction analysis. For the 475- and 2,475-year return periods the memorandum specifies the use of ⅔ PGA_M, and PGA_M and a factor of safety of 1.1, or 1.0, respectively, in the determination of liquefiable soils. Further, a fine-grained soil is considered non-liquefiable if the soil has a PI > 18 and test results indicate the soil is insensitive; or PI < 12 with moisture content > 85% of the liquid limit.

For this analysis we used the soil profiles identified with Borings B-1 and B-4, the historic high groundwater depth of 7 feet, and site accelerations (PGA_M and ⅔ PGA_M) of 0.878g and 0.585g, as obtained from the USGS web site and determined from ASCE-07. A corresponding site moment magnitude of 7.1 was determined using Deaggregation methods published by USGS. As the actual historic high groundwater table is at a greater elevation than the current groundwater elevation encountered during our subsurface exploration, saturated moisture contents of the soil with a PI < 12 above the current water table were calculated and used in our analysis. Values used in our liquefaction analysis are also included in Appendix A with the liquefaction calculations and results.

The on-site, fine grained soils (clay and silt) were evaluated to determine susceptibility to liquefaction during ground shaking in accordance with the criteria outlined within the California Geological Survey (CGS) Special Publication 117A and CLA requirements. Soils considered to be potentially susceptible to undergo seismically induced deformation during liquefaction are classified in the following manner:

1. Plastic Index (PI) < 12 and moisture content greater than 85 percent of the Liquid Limit
2. Sensitive soils with PI > 18.
3. All loose to medium dense granular soils.

The soils obtained during our subsurface exploration, which were considered to possibly undergo seismically induced deformation, were tested for CGS Special Publication 117A guidelines with results in the table below.

Test Boring No. & Depth	Liquid Limit (LL)	Plastic Index (PI)	In-situ Moisture	W_c/LL
B-1 @ 6 ft.	52	27*	30	0.58
B-1 @ 10ft.	52	27*	32	0.62
B-1 @ 15ft.	52	30*	30	0.58
B-1 @ 20 ft.	52	30*	33	0.63
B-1 @ 25 ft.	34	5	29	0.85
B-1 @ 35 ft.	27	3	21	0.78
B-1 @ 40 ft.	30	3	17	0.57
B-1 @ 45 ft.	44	20	29	0.66
B-4 @ 6 ft.	38	8	29**	0.68
B-4 @ 15ft.	56	28*	34	0.61
B-4 @ 20 ft.	31	6	22	0.71
B-4 @ 25 ft.	30	4	28	0.93
B-4 @ 30 ft.	41	18*	32	0.78
B-4 @ 35 ft.	41	18*	31	0.76
B-4 @ 40 ft.	30	3	29	0.97
B-4 @ 45 ft.	29	7	22	0.76

* Soil tested and considered to be non-sensitive with Sensitivity ranging from 1.1 to 1.4.
** The soil moisture content represents the calculated saturated moisture content of the soil.

The results of our analysis with a high water table of 7 feet indicate that the site soils are susceptible to the following soil liquefaction magnitudes.

Liquefaction (inches)		
Boring	10% in 50 yr	2% in 50 yr
B-1	1.6	1.7
B-4	3.0	3.0

The total and differential seismic and static settlements for the borings were added together resulting in the following ranges:

Settlement (inches)			
	Seismic	**Static**	**Seismic + Static**
Total	1.6 to 3.0	0.5	**2.1 to 3.5**
Differential	1.4 (3.0 minus 1.6)	0.25	**1.6**

The liquefaction analysis was performed using the computer program LiquefyPro (Version 5) developed by Civil Tech Software. The program is based on the most recent publications of the NCEER Workshop and SP117A Implementation. Corrected SPT blow counts based upon hammer energy ratio, borehole diameter and sampling method were used in analysis calculations. The liquefiable results are presented graphically in Appendix A with the computer output files.

In accordance with the CLA Bulletin 2020 Los Angeles Building Code And Information Bulletins, dated January 9, 2020, and seismically induced settlements required to be evaluated based upon ASCE 7-16 Sections 11.8 and 12.13.9, the calculated maximum differential settlement allowed per Table 12.13-3 Differential Settlement Threshold is 0.010(L), where L is considered to be the spacing from column to column, or 30 feet. Therefore, the maximum allowable differential settlement is 3.6 inches (0.010 x 30 feet) over the 30 foot span, for Differential Settlement Threshold, which is greater than the calculated 1.6 inches. Therefore, according to ASCE 7-16 Section 12.13.9.2 design beyond the requirements of Section 12.13.9.2.1 i.e. deep foundation is not required.

Liquefaction-Induced Lateral Spreading

Lateral spreading of the ground surface during a seismic activity usually occurs along the weak shear zones within a liquefiable soil layer and has been observed to generally take place toward a free face (i.e. retaining wall, slope or channel) and to lesser extent on ground surfaces with a very gentle slope. **Due to absence of any slope or channel within or near the site, the potential for lateral spreading in our opinion is considered to be low.**

Liquefaction–Induced Potential for Surface Manifestation

Since the site soils are not susceptible to near surface (within the upper 25 feet) or significant soil liquefaction, **surface manifestations resulting from soil liquefaction at this site are considered to be low.**

6.2 Foundation Recommendations

A mat foundation is considered suitable for the structure. We recommend the mat be designed for a maximum, net allowable bearing capacity of 1,500 pounds-per-square-foot (psf), and a maximum modulus of subgrade reaction (k_s) 35 pounds per cubic inch (pci). Net allowable boring capacity is considered to be the increase in the overburden stress above the soil weight, taken as 120 pcf times the height of the soil. The recommended allowable soil bearing pressure may be increased by one-third for short term wind and/or seismic loads.

It is our understanding that the mat foundation loads will be uniformly transferred to the bearing soil from the column loads, based upon column spacing ranging from 10 feet by 10 feet to 30 feet by 30 feet, and respective estimated mat foundation thicknesses of 10 inches to 22 inches in thickness.

Reinforcing

The design of the foundations and the determination of the steel reinforcing should be performed by the project structural engineer.

Lateral Load Resistance

Lateral load resistance will be developed by a combination of friction acting at the base of the mat and the passive earth pressure developed below grade. Passive pressure and friction may be used in combination, without reduction, in determining the total resistance to lateral loads. A one-third increase in the passive pressure value may be used for short duration wind and/or seismic loads.

The foundation subgrade will consist of a silty sand or better material as discussed in the Methane Considerations Section. A coefficient of friction of 0.45 is therefore recommended for dead load forces for foundations. A higher coefficient is possible with a high quality granular fill at least 12 inches thick. An allowable passive earth pressure of 250 psf per foot of foundation depth (pcf) below the lowest adjacent grade may be used for the sides of foundations placed against newly placed structural fill. The maximum recommended allowable passive pressure is 1,500 psf.

Bearing Material Criteria

Soil suitable to serve as the structural fill subgrade below the methane and drainage layers should exhibit an average N value for non-cohesive soils and unconfined compressive strength for cohesive soils of at least 6 and 1.5 tons per square foot (tsf), respectively, based on the recommended allowable soil bearing pressure verified by the geotechnical engineer during construction. Suitable bearing soils are expected to be encountered at the recommended excavation depths with structural fill below the mat foundation and aggregate required for the methane and dewatering system. However, field testing by the geotechnical engineer within the foundation bearing soils is recommended to document that the foundation support soils possess the minimum strength parameters noted above. Testing may consist of Dynamic Cone Penetration tests (per ASTM Special Publication 399), penetrometer tests, or other tests as deemed suitable by the geotechnical engineer. If unsuitable bearing soils are encountered, they should be recompacted in-place, if feasible, or excavated to a suitable bearing soil subgrade and to a lateral extent as defined by Item No. 3 of the enclosed Guide Specifications, with the excavation backfilled with structural compacted fill to develop a uniform bearing grade.

Foundation Embedment

The California Building Code (CBC) requires a minimum 12-inch foundation embedment depth. At the time of this report, the basement foundation is planned for the entire building, which will automatically exceed this requirement.

However, if foundations are planned outside of the basement area it is recommended that exterior foundations extend at least 18 inches below the adjacent exterior grade for bearing capacity and

to provide greater protection of the moisture sensitive bearing soils. All foundations must be protected against weather and water damage during and after construction, and must be supported by the minimum recommended structural fill layer.

6.3 Mat Recommendations

Subgrade

The mat subgrade should be prepared in accordance with the appropriate recommendations presented in the Site Development Recommendations section of this report. Foundation, utility trenches and other below-mat excavations should be backfilled with structural compacted fill in accordance with the project specifications.

Design

The ground floor of the proposed structure may be designed as load-bearing mat based on the recommendations presented in the foundation section of this report.

The mat is recommended to be underlain by a free-draining granular base, minimum 12 inches in thickness as designed for the methane and sub-drainage system. A minimum 20-mil synthetic sheet should be provided to serve as a vapor/methane barrier as specified in detail in the methane and sub-drainage section. It is recommended that a structural engineer or architect specify the vapor barrier location with careful consideration of concrete curing and the effects of moisture on future flooring materials. The vapor barrier is recommended to be in accordance with ASTM E 1745-97, which is entitled: *Standard Specification for Plastic Water Vapor Retarders Used in Contact with Soil or Granular Fill under Concrete Slabs*. If materials underlying the synthetic sheet contain sharp, angular particles, a layer of sand approximately 2 inches thick and/or a geotextile should be provided to protect it from puncture. An additional 2-inch thick layer of sand may be needed between the mat and the vapor retarder to promote proper curing. Proper curing techniques are recommended to reduce the potential for shrinkage cracking and concrete curling.

Estimated Settlement

Post-construction total and differential movements of the mat designed and constructed in accordance with the recommendations provided in this report are estimated to be on the order of those estimated for foundations. The mat differential movement is estimated to be in the range of ½ to ¼ inch over 40 feet depending on the thickness of the structural fill layer.

As previously indicated, the total seismic plus static settlement is 2.1 to 3.5 inches, and the total differential seismic plus static is 1.6 inches.

6.4 Elevator Pit Recommendations

The proposed 3-story building with basement will include elevator pits. Details and locations of the elevator pits were not provided; however, it is assumed that the pits to be reinforced cast-in-place concrete structures about 5 feet below the elevation of the lowest level floor, or about El. 1.8 feet. Giles must be notified if elevator pits will be deeper; this report may need to be revised. Geotechnical-related recommendations for elevator pits that are 5 feet deep are provided below.

This report assumes that elevator pits will be 5 feet below the floor of the basement, at El. 1.8 feet, as determined from the current civil plans. Therefore, the floor of the elevator pits will be near the water table and will be supported by suitable bearing soil. The bearing pressure of the mat is therefore recommended for the elevator pit bearing pressure. It is assumed that elevator pit walls will be cast against existing soil, or that engineered fill between the walls and surrounding soil will consist or properly compacted, imported granular material approved by the geotechnical engineer. Based on that assumption, elevator walls are to be design for an "at-rest" equivalent fluid pressure of 56 pcf. Horizontal pressures caused by surface and subsurface surcharge loads must be added to the "at-rest" fluid pressure. Uplift forces due to buoyant forces should also be considered. Giles could provide supplemental recommendations on a case-by-case basis, but would require specific structural information.

6.5 Methane and Sub-Drainage Considerations

The methane venting and sub-drainage system beneath the mat can be designed as a combined system considering the results of the methane testing, current and historic high groundwater elevations, and proposed basement elevation.

Methane gases were encountered at the site during a methane testing program. In addition, the site is located within a designated LADBS Methane Buffer Zone. Due to the methane or noxious gases that exist and/or will develop, extreme care must be taken during construction due to the existence and/or development of a noxious or explosive condition.

Furthermore, because of the existence and/or development of methane gas, a below-floor vent system and below-floor gas and water impermeable membrane such as Stego Wrap™ (20 mil) or equivalent) is recommended beneath the building. The combined system should be placed immediately below the mat where the methane gas membrane will also serve as an impermeable moisture barrier. The methane and waterproofing membrane is recommended to consist of an impermeable 20 mil Stego Wrap (or equivalent), installed in accordance with the manufacturer's specifications.

Continuous vent/drainpipes should be installed along the lowest-level perimeter. Laterals should be installed on a 50 foot grid spacing, north/south and east/west, connected to the perimeter piping. The vent/drain pipes should be minimum 4-inch-diameter perforated pipes, with a minimum 4 inches of free-draining, open-graded, crushed aggregate above and below the pipe. A minimum 12-inch-thick free-draining, open-graded, crushed aggregate should underlie the 1st-floor mat foundation. The base course will serve as a drainage and gas course and it should, therefore, underlie the entire foundation and be continuous to the drain/vent pipes for water and gas below the mat to adequately discharge into the drainage system or up the vent risers. The pipe should be specifically designed for drainage applications with solid pipes for vent risers to the roof with a passive mechanical system. For water removal, the interior and exterior drainpipe systems should connect to a common sump crock.

The project architect should determine the sump pump crock location based upon architectural and structural details of the buildings. Sump pumps should be designed to discharge water to the storm drain or acceptable discharge location.

6.6 Construction Considerations

The recommendations for site development as subsequently described are based upon the conditions encountered at the test boring locations or determined from site documents. According to the ALTA Map provided, date May 26, 1999, the southwest corner of the site in the area of the planned building basement area previously had a 2-story residence, barn and shed. Other shallow, on-site structures, such as above-ground tanks, pavements, sheds, cages, were also noted to be previously on-site within the planned building and pavement areas. Overexcavation may be required due to previous structures on-site.

Construction Dewatering

As mentioned previously, groundwater was encountered at 15 to 25 feet below grade (El. 1.3 to El. -10 feet) during our subsurface investigation. Therefore, groundwater is not expected to impact excavations for the foundation and utilities. However, the site may be susceptible to the development of shallow perched water conditions. In the event that shallow perched water is encountered, filter sump pumps placed within pits in the bottoms of excavations are expected to be the most feasible method of construction dewatering.

Soil Excavation

Some slope stability problems should be expected in steep, unbraced excavations considering the granular nature of the subsoils. All excavations must be performed in accordance with CAL-OSHA requirements, which is the responsibility of the contractor. Shallow excavations may be

adequately sloped for bank stability while deeper excavations or excavations where adequate back sloping cannot be performed may require some form of external support such as shoring or bracing.

6.7 Retaining Wall Recommendations

Due to the existing site grades and planned building layout and basement elevations, it is anticipated that basement retaining walls will be required. The height of the retaining walls for the basement are expected to be about 13 feet at the south wall, 11 feet at the east wall, 8 feet at the north wall, and 11 feet at the west wall.

The retaining wall system is expected to consist of a driven sheet pile or soldier pile wall as a permanent wall system, or the basement wall may be a combined retaining wall. The current site plans prepared by DRC, show building setbacks: 16 feet from the southern easements; 40 feet from the north property line; and, 10 feet from the west property line. Based upon this building layout, it is possible to bench/slope the soil from the base of the basement excavation towards the property lines at slopes of about a 1:1 (H:V) slope on the east side of the building, or flatter on the north and south sides of the proposed building. The east side may require temporary or permanent shoring, or a steeper slope greater than 1:1 may be considered and designed upon request, if desired.

Alternate retaining wall(s) may be designed such as conventional reinforced concrete cantilevered walls supported by spread footings designed for an allowable soil bearing pressures of 2,500 psf.

Static and Seismic Lateral Earth Pressures

It is our understanding that the building below-grade walls may or may not be the retaining wall structure. Retaining wall design parameters were determined in accordance with LADBS Information Bulletin, Retaining Wall Design, dated January 1, 2020. The walls will exceed 6 feet in height, and considering a Site Class D, it is currently required that seismic forces be included with static forces for the design of earth pressures on the walls. From the proposed building and finished site elevations the retaining walls will retain the upper 8 to 15 feet of soil. These materials were correlated and/or tested by the Standard Test Method for Direct Shear Test of Soils Under Consolidated Drained Conditions (ASTM D 3080), resulting in phi angles ranging from 31 to 32 degrees. A phi angle of 31 was used for all soil conditions to compute the lateral earth equivalent fluid pressures.

For at-rest (static) conditions, an EFP of 58 pcf was calculated, if the building exterior walls are the retaining structure. For active conditions and walls over 6 feet, the total lateral earth pressure (active pressure plus the seismic increment of the lateral earth pressure), was calculated resulting

in 37 pcf plus 25 pcf, respectively, for a total of 62 pcf equivalent fluid pressure (EFP). The seismic increase was calculated using the seismic coefficient, which was ½ of ⅔ the maximum PGA (PGA_m) for the site, with PGAm determined from the USGS Design Maps tool from the USGS website.

The above pressures also consider level backfill extending at least 150% of the wall height behind the wall and surface drainage directed away from the wall. Backfill behind the wall should consist of free-draining granular materials. The EFP above may be used for on-site soils to be used as backfill materials, assuming drained conditions and a level adjacent backfill extending at least 150% the height of the wall and surface water is directed away from the wall. However, imported soils (EI < 21) and/or backfill being placed behind the retaining wall should be tested by the geotechnical engineer prior to placement to verify strength parameters. All retaining walls should be designed with a proper subdrain system. All walls should also be designed to support any adjacent structural surcharge loads imposed vehicle or structural loading, in addition to the above recommended active earth pressure.

Undrained conditions may occur behind driven sheet piles and therefore these structures must be designed for undrained earth pressures. For the undrained active plus seismic pressures and for at-rest conditions an EFP of 77 is recommended.

For the design of retaining wall system, an ultimate lateral bearing value (passive value) of 350 pounds per square foot per foot of depth may be assumed for soils below the level of excavation. However, passive resistance should be ignored within the upper foot due to possible disturbance. The construction of this system should be monitored continuously and any adjacent structures should be observed for any potential lateral and vertical movement. Retaining wall plans should be reviewed by Giles once available.

Temporary or permanent shoring systems within the areas of the building perimeter may be designed with the same active, at-rest, and passive EFP's as retaining walls.

Drainage and Damp-proofing

Retaining walls are recommended to be designed for drained earth pressures where possible, except as described for driven sheet piles, and therefore, adequate drainage should be provided behind the walls. This can be accomplished by installing subdrains at the base of the walls. Wall footing-drains should consist of a system of filter material and perforated pipe. The perforated pipe system should consist of 4-inch diameter, schedule 40, PVC pipe or equivalent, embedded in ¾-inch open graded gravel or crushed rock enveloped in Mirafi 140 geofabric or equivalent. The pipe should be placed at the base of the wall, and then routed to a suitable area for discharge of accumulated water.

Wall backfill should be protected against infiltration of surface water. Backfill adjacent to walls should be sloped so that surface water drains freely away from the wall and will not pond. Damp-proofing of walls below-grade is recommended to prevent efflorescence.

Wall Backfill

Retaining wall backfill behind the drainage layers should consist of low-expansive on-site or imported soils (EI < 21), as determined by ASTM D 4829 method, and approved by the geotechnical engineer. Wall backfill should not contain organic material, rubble, debris, and rocks or cemented fragments larger than 3 inches in greatest dimension. A 1-foot thick, low-expansive cohesive layer or pavement should be placed at the surface to help prevent surface water intrusion. A geotextile or filter fabric should be placed between the granular drainage layers and adjacent soils (excavated face or compacted materials) to prevent fines from migrating into the drainage layers.

Backfill should be placed in lifts not exceeding 8 inches in thickness, moisture conditioned as necessary, and mechanically compacted throughout to at least 90 percent of the maximum dry density as determined by Modified Proctor (ASTM D 1557). Retaining walls should be properly braced prior to placement and compaction of backfill should be performed with extreme care not to damage the walls.

Elevator pits should be designed as watertight structures with undrained lateral soil pressure, or as a drained condition with sub-drain system stepping down to below the elevator pits.

6.8 Site Development Recommendations

The following recommendations for future site development have been based upon the proposed 3-story structure with basement, potential foundation bearing grades, the conditions encountered at the test boring locations and the time of year in which the exploration was performed.

Site Clearing and Demolition

Clearing operations should include the removal of all existing vegetation and debris within the area of the future new site development. Trees and large shrubs to be removed should be grubbed out to include their stumps and major root systems. All soils disturbed during site clearing should also be removed to expose suitable bearing soils. Some of the near surface fine grained soils have in-situ moisture contents that were very moist and above the optimum moisture content to an extent that may create difficulties in achieving the required compaction. Therefore, air-drying or import soil may be required.

Should any unusual soil conditions or subsurface structures be encountered during grading, they should be brought to the immediate attention of the project geotechnical consultant for corrective recommendations.

Existing Utilities

All existing utilities should be located. Utilities that will be preserved are recommended to be relocated outside building areas. Utilities that are not to be reused should be capped off and removed or properly abandoned in-place in accordance with local codes and ordinances. The excavations made for removed utilities are recommended to be backfilled with structural compacted fill. Underground utilities, which are to be reused or abandoned in-place, are recommended to be evaluated by the structural engineer and utility backfill is recommended to be evaluated by the geotechnical engineer, to determine their potential effect on the new development. If any existing utilities are to be preserved, grading operations must be carefully performed so as not to disturb or damage the existing utility.

Building Area Subgrade Preparation

Excavation is anticipated to extend to maximum depths of 12 inches below the bottom of basement mat foundations, resulting in excavation depths up to about 18 feet ± below grade, at Elevation (El.) 3.8 feet. The soils exposed at the base of this recommended over-excavation should be examined by the geotechnical engineer to document that all other unsuitable soils have been removed. Prior to placement of fill, the exposed surfaces approved for fill placement should be scarified to an approximate depth of at least 6 to 8 inches, moisture conditioned (air-dried) and recompacted to a minimum relative compaction of at least 90% of the maximum dry density as determined by Modified Proctor (ASTM D 1557-00). A representative of the project geotechnical consultant should be present on-site during grading operations to verify proper placement and adequate compaction of all fills.

Following scarification or soil stabilization, ½ to ¾-inch open-graded crushed aggregate, 12 inches in minimum thickness, for the dewatering and methane system is recommended.

Proofroll and Compact Subgrade

The subgrades within future pavement area improvements should be proofrolled in the presence of the geotechnical engineer with appropriate rubber-tire mounted heavy construction equipment or a loaded truck to detect very loose/soft yielding soil which should be removed to a stable subgrade. Following proofrolling and completion of any necessary over-excavation, the subgrade should be scarified to a minimum depth of 8 inches, moisture conditioned and recompacted to at least 90 percent of the Modified Proctor (ASTM D1557-00) maximum density. The upper 1 foot of the pavement subgrade should have minimum in-place density of at least 95% of the maximum dry density. Low areas and excavations may then be backfilled in lifts with suitable low expansive

(EI < 51) structural compacted fill. The selection, placement and compaction of structural fill should be performed in accordance with the project specifications.

The Guide Specifications included in Appendix D (Modified Proctor) of this report are recommended to be used, at a minimum, as an aid in developing the project specifications. The mat foundation subgrade may need to be recompacted prior to mat construction due to weather and equipment traffic effects on the previously compacted soil.

Reuse of On-site Soil

On-site low expansive material (EI < 51) may be reused as structural compacted fill within future parking lot and building areas provided they do not contain oversized materials and significant quantities of organic matter or other deleterious materials. Care should be used in controlling the moisture content of the soils to achieve proper compaction for load bearing and pavement support. All subgrade soil compaction as well as the selection, placement and compaction of new fill soils should be performed in accordance with the project specifications under engineering controlled conditions. Some drying of the site soils may be necessary prior to their use as engineered fill, based on the in-situ moisture contents of these soils.

Subgrade Protection

The near surface soils that are expected to comprise the subgrade are sensitive to water and disturbance from construction activities. Unstable soil conditions will develop if the soils are exposed to moisture increases or are disturbed (rutted) by construction traffic. The site should be graded to prevent water from ponding within construction areas and/or flowing into excavations. Accumulated water must be removed immediately along with any unstable soil. Foundation concrete should be placed and excavations backfilled as soon as possible to protect the bearing grade.

The degree of subgrade instability and associated remedial construction is dependent, in part, upon precautions taken by the contractor to protect the subgrade during site development.

Silt fences or other appropriate erosion control devices should be installed in accordance with local, state and federal requirements at the perimeter of the development areas to control sediment from erosion. Since silt fences or other erosion control measures are temporary structures, careful and continuous monitoring and periodic maintenance to remove accumulated soil and/or replacement should be anticipated.

Fill Placement

Material for engineered fill should be select free of organic material, debris, and other deleterious substances, and should not contain fragments greater than 3 inches in maximum dimension. On-site excavated soils that meet these requirements may be used to backfill the excavated building and pavement areas.

All on-site fill should be placed in 8-inch-thick maximum loose lifts, moisture conditioned and then compacted in place to at least 90 percent of the Modified Proctor maximum density. The upper 1 foot of the pavement subgrade should have a minimum in-place density of at least 95%. A representative of the project geotechnical consultant should be present on-site during grading operations to document proper placement and compaction of all fill, as well as to verify compliance with the other geotechnical recommendations presented herein.

Import Structural Fill

The soils imported to the site for use as structural fill should consist of low expansive soils (EI < 51). Materials designated for import should be submitted to the project geotechnical engineer no less than three working days for evaluation. In addition to expansion criteria, soils imported to the site should exhibit adequate shear strength characteristics for the recommended allowable soil bearing pressure; soluble sulfate content and corrosivity; and pavement support characteristics. Shrinkage will be a function of actual materials to be used during grading and construction.

6.9 Pavement Recommendations

New Pavement Subgrades

The subgrade in areas of new pavement construction is expected to consist of soils that exhibit a very low to low expansion potential. However, the anticipated subgrade soils are estimated to possess an R-value of 5 to 20. An R-value of 5 has been assumed in the preparation of the pavement design. It should however, be recognized that the City of Los Angeles may require a specific R-value test to verify the use of the following design. It is recommended that this testing, if required, be conducted following completion of rough grading in the proposed pavement areas so that the R-value test results are indicative of the actual pavement subgrade soils. Alternatively, a minimum code pavement section may be required if a specific R-value test is not performed. To use this R-value, all fill added to the pavement subgrade must have pavement support characteristics at least equivalent to the existing soils, and must be placed and compacted in accordance with the project specifications.

Asphalt Pavements

The following table presents recommended thicknesses for a new flexible pavement structure consisting of asphaltic concrete over a granular base, along with the appropriate CALTRANS specifications for proper materials and placement procedures. An alternate pavement section has been provided for use in parking stall areas due to the anticipated lower traffic intensity in these areas. However, care must be used so that truck traffic is excluded from areas where the thinner pavement section is used, since premature pavement distress may occur. In the event that heavy vehicle traffic cannot be excluded from the specific areas, the pavement section recommended for drive lanes should be used throughout the parking lot.

ASPHALT PAVEMENTS			
Materials	**Thickness (inches)**		**CALTRANS Specifications**
	Parking Stalls (TI=4.0)	**Drive Lanes (TI=5.0)**	
Asphaltic Concrete Surface Course (b)	1 ½	1 ½	Section 39, (a)
Asphaltic Concrete Binder Course (b)	2	2	Section 39, (a)
Crushed Aggregate Base Course	7	10	Section 26, Class 2 (R-value at least 78)
NOTES: (a) Compaction to density between 95 and 100 percent of the 50-Blow Marshall Density (b) The surface and binder course may be combined as a single layer placed in one lift if similar materials are utilized.			

Pavement recommendations are based upon CALTRANS design parameters for a twenty-year design period and assume proper drainage and construction monitoring. It is, therefore, recommended that the geotechnical engineer monitors and tests subgrade preparation, and that the subgrade be evaluated immediately before pavement construction.

Portland Concrete Pavements

Portland Cement Concrete pavements are recommended in areas where traffic is concentrated such as the entrance/exit aprons as well as areas subjected to heavy loads such as the trash enclosure loading zone. The preparation of the subgrade soils within concrete pavement areas should be performed as previously described in this report. Portland Cement Concrete pavements in high stress areas are recommended to be at least 6 inches thick containing No. 3 bars at 18-inch on-center both ways placed at mid-height. The pavement should be constructed

in accordance with Section 40 of the CALTRANS Standard Specifications. A minimum 4-inch thick layer of base course (CALTRANS Class 2) is recommended below the concrete pavement. This base course should be compacted to at least 95% of the material's maximum dry density.

The maximum joint spacing within all of the Portland Cement Concrete pavements is recommended to be 12 feet or less to control shrinkage cracking. Load transfer reinforcing is recommended at construction joints perpendicular to traffic flow if construction joints are not properly keyed. In this event, ¾-inch diameter smooth dowel bars, 18 inches in length placed at 12 inches on-center are recommended where joints are perpendicular to the anticipated traffic flow. Expansion joints are recommended only where the pavement abuts fixed objects such as light standard foundations. Tie bars are recommended at the first joint within the perimeter of the concrete pavement area. Tie bars are recommended to be No. 4 bars at 42-inch on-center spacings and at least 48 inches in length.

General Considerations

Pavement recommendations assume proper drainage and construction monitoring and are based on traffic loads as indicated previously. Pavement designs are based on either PCA or CALTRANS design parameters for twenty (20) year design period. However, these designs are also based on a routine pavement maintenance program and significant asphalt concrete pavement rehabilitation after about 8 to 10 years, in order to obtain a reasonable pavement service life.

6.10 Recommended Construction Materials Testing Services

The report was prepared assuming that Giles will perform Construction Materials Testing (CMT) services during construction of the proposed development. In general, CMT services are recommended (and expected) to at least include observation and testing of foundation and pavement support soil and other construction materials. It might be necessary for Giles to provide supplemental geotechnical recommendations based on the results of CMT services and specific details of the project not known at this time.

6.11 Basis of Report

This report is based on the Giles' original proposal, dated June 6, 2018 (Giles' proposal number 2GEP-1806004), and subsequent correspondence and scope additions since the original proposal based on meetings and email correspondence, as a result of field and laboratory data results, project developments, and other factors. The actual services for the project varied somewhat from those described in the proposal because of the conditions that were encountered while performing the services and in consideration of the proposed project.

This report is strictly based on the project description given earlier in this report. Giles must be notified if any parts of the project description or our assumptions are not accurate so that this report can be amended, if needed. This report is based on the assumption that the facility will be designed and constructed according to the codes that govern construction at the site.

The conclusions and recommendations in this report are based on estimated subsurface conditions as shown on the *Records of Subsurface Exploration*. Giles must be notified if the subsurface conditions that are encountered during construction of the proposed development differ from those shown on the *Records of Subsurface Exploration* because this report will likely need to be revised. General comments and limitations of this report are given in the appendix.

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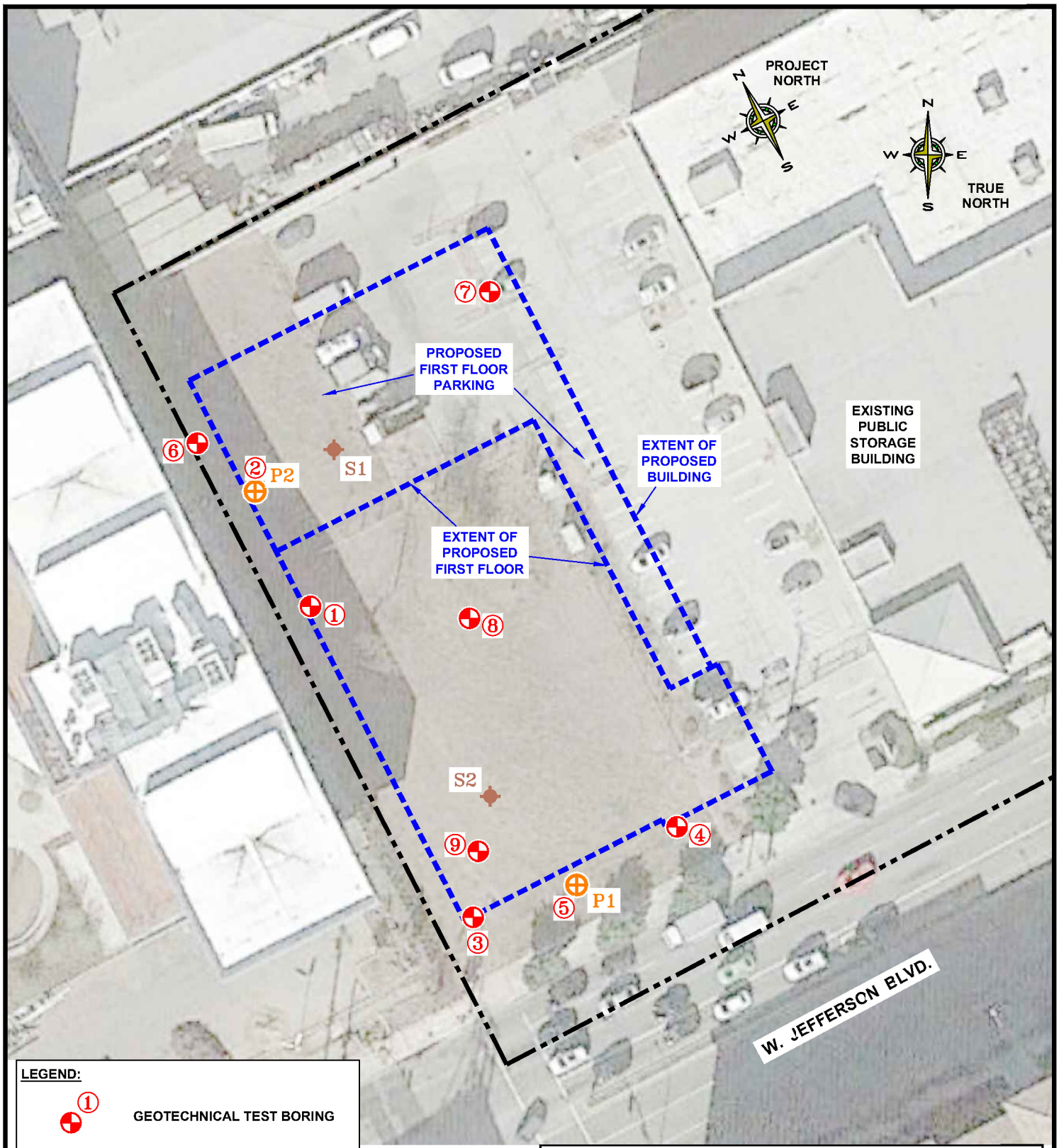
APPENDIX A

FIGURES AND TEST BORING LOGS

The Test Boring Location Plan contained herein was prepared based upon information supplied by *Giles'* client, or others, along with *Giles'* field measurements and observations. The diagram is presented for conceptual purposes only and is intended to assist the reader in report interpretation.

The Test Boring Logs and related information enclosed herein depict the subsurface (soil and water) conditions encountered at the specific boring locations on the date that the exploration was performed. Subsurface conditions may differ between boring locations and within areas of the site that were not explored with test borings. The subsurface conditions may also change at the boring locations over the passage of time.



LEGEND:

- ① GEOTECHNICAL TEST BORING
- ⑤ P1 GEOTECHNICAL TEST BORING / PERCOLATION TEST BORING
- S−1 SLUG TEST

0 25' 50'

APPROXIMATE SCALE

NOTES:

1.) TEST BORING LOCATIONS ARE APPROXIMATE.

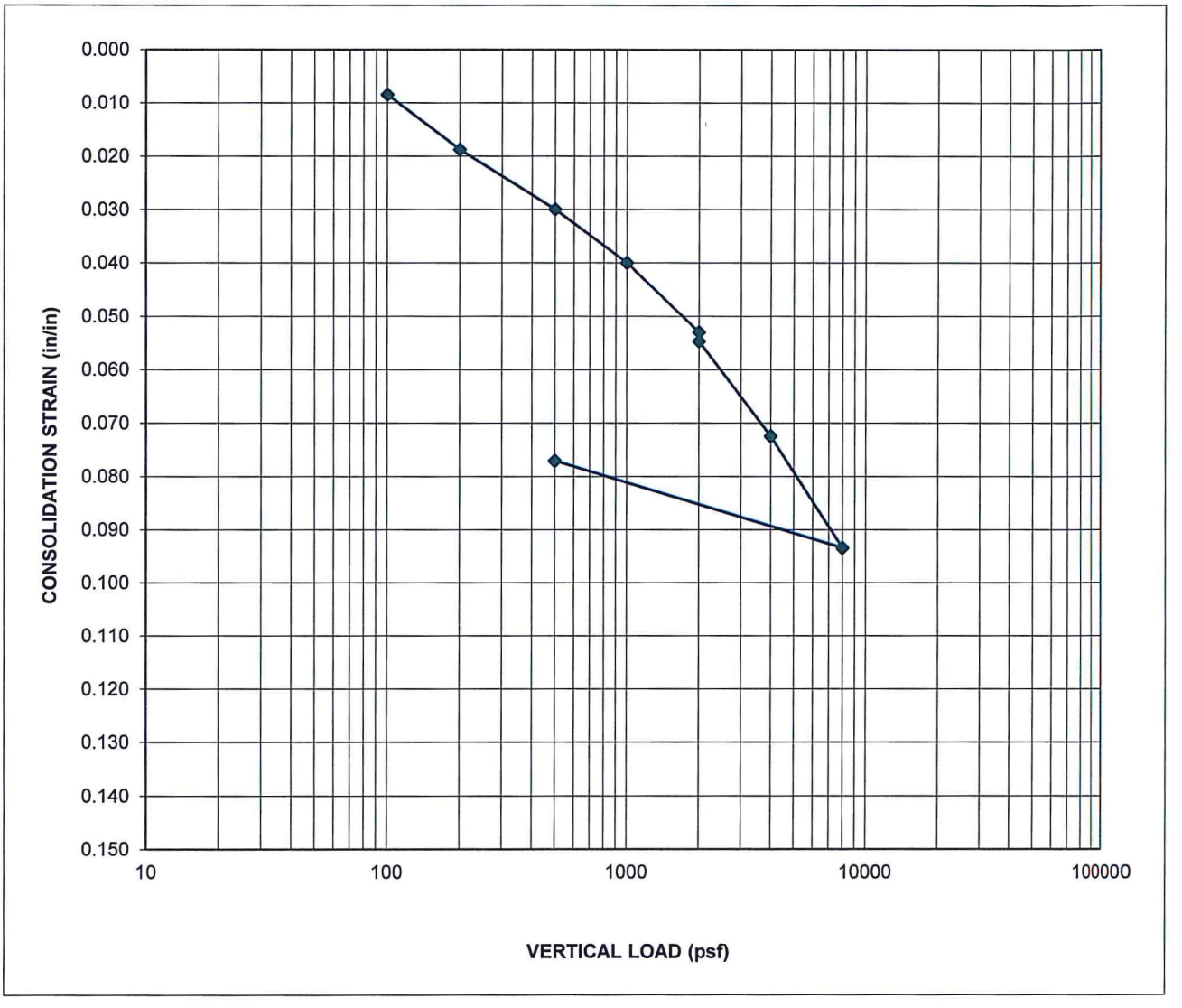
2.) PROPOSED FEATURES ARE APPROXIMATE BASED ON THE "EROSION CONTROL PLAN", DATED 12-18-2018, PREPARED BY DRC ENGINEERING.

GILES ENGINEERING ASSOCIATES, INC.
1965 N. MAIN STREET
ORANGE, CA 92865 (714)279-0817
www.gilesengr.com

FIGURE 1
TEST BORING LOCATION PLAN
PROPOSED 4-STORY BUILDING WITH BASEMENT
PUBLIC STORAGE
12681 W. JEFFERSON BOULEVARD
LOS ANGELES (PLAYA VISTA), CALIFORNIA

DESIGNED	DRAWN	SCALE	DATE	REVISED
JLM	JLM	approx. 1"=50'	02-01-19	03-28-19
PROJECT NO.: 2G-1806003			CAD No. 2g1806003-blp3	

CONSOLIDATION / SWELL TEST ASTM D2435/ASTM D4546



Classification	Silt, trace fine Sand		
Boring No.	B-3		
Sample No.	3-CS	Initial Moisture Content (%)	24.5
Depth (ft.)	6 to 7.5	Final Moisture Content (%)	24.8
Elevation	9.5 ft	Natural Density (pcf)	119.2
Liquid Limit		Initial Dry Density (pcf)	95.7
Plastic Limit		Final Dry Density (pcf)	104.8
Specimen Diameter (in.)	2.42	Collapse @ 2,000 psf	0.1%
Initial Specimen Thickness (in.)	1.00		

Sample inundated at 2,000 psf pressure

Project:	PS Playa Vista
Client:	Public Storage
Project No.:	2G-1806003
Figure No.:	2

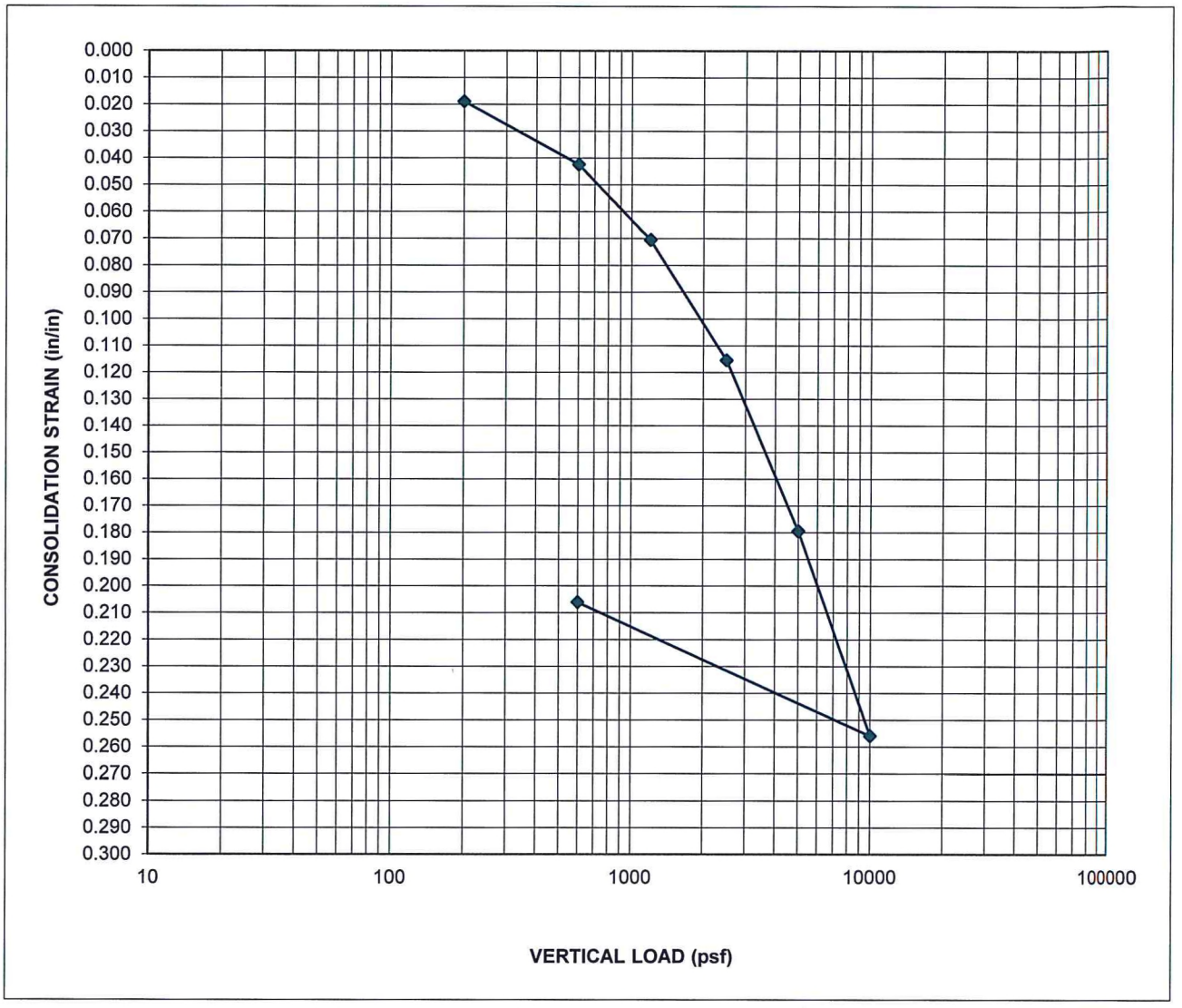
GILES ENGINEERING ASSOCIATES, INC.

-GEOTECHNICAL, ENVIRONMENTAL, AND CONSTRUCTION MATERIALS-

1965 NORTH MAIN STREET, ORANGE, CALIFORNIA

OFFICE: 714-279-0817 FAX : 714-279-9687

CONSOLIDATION / SWELL TEST ASTM D2435/ASTM D4546



Classification	Silty Clay		
Boring No.	B-3		
Sample No.	6-ST	Initial Moisture Content (%)	31.9
Depth (ft.)	16 to 18.5	Final Moisture Content (%)	24.3
Elevation	-1.5ft	Natural Density (pcf)	111.0
Liquid Limit		Initial Dry Density (pcf)	84.1
Plastic Limit		Final Dry Density (pcf)	92.1
Specimen Diameter (in.)	2.90	Swell/Collapse @ 2500 psf	0
Initial Specimen Thickness (in.)	1.00		

Sample inundated at 2,500 psf pressure

Project:	PS Playa Vista
Client:	Public Storage
Project No.:	2G-1806003
Figure No.:	3

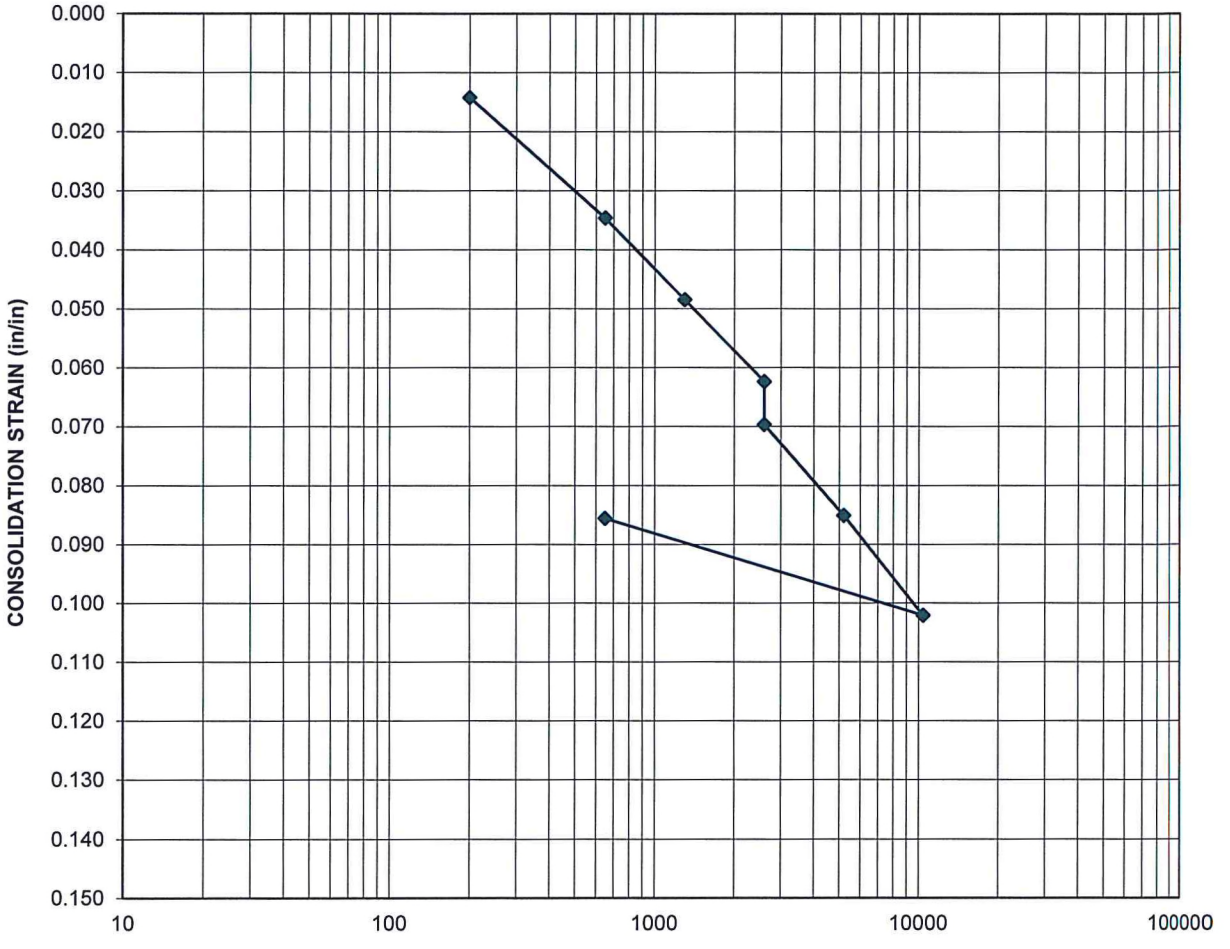
GILES ENGINEERING ASSOCIATES, INC.

-GEOTECHNICAL, ENVIRONMENTAL, AND CONSTRUCTION MATERIALS-

1965 NORTH MAIN STREET, ORANGE, CALIFORNIA

OFFICE: 714-279-0817 FAX : 714-279-9687

CONSOLIDATION / SWELL TEST ASTM D2435/ASTM D4546



Classification	Fine Sand, some Silt		
Boring No.	B-4		
Sample No.	5-ST	Initial Moisture Content (%)	23.5
Depth (ft.)	11.5 to 14	Final Moisture Content (%)	27.1
Elevation	4 ft	Natural Density (pcf)	115.4
Liquid Limit		Initial Dry Density (pcf)	93.5
Plastic Limit		Final Dry Density (pcf)	102.3
Specimen Diameter (in.)	2.90	Collapse @ 2600 psf	0.7%
Initial Specimen Thickness (in.)	1.00		

Sample inundated at 2600 psf pressure

Project:	PS Playa Vista
Client:	Public Storage
Project No.:	2G-1806003
Figure No.:	4

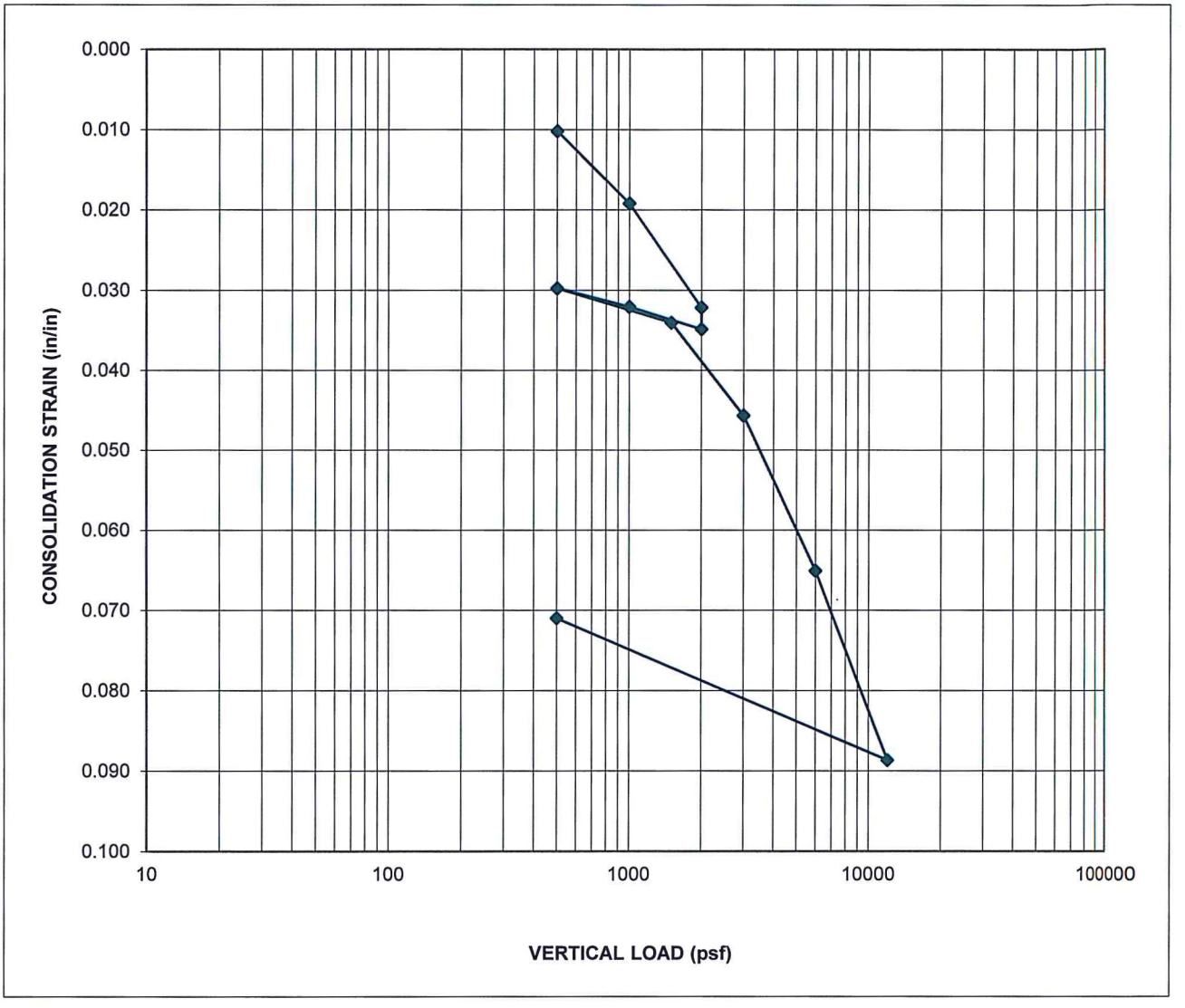
GILES ENGINEERING ASSOCIATES, INC.

-GEOTECHNICAL, ENVIRONMENTAL, AND CONSTRUCTION MATERIALS-

1965 NORTH MAIN STREET, ORANGE, CALIFORNIA

OFFICE: 714-279-0817 FAX : 714-279-9687

CONSOLIDATION / SWELL TEST ASTM D2435/ASTM D4546



Classification	Silt		
Boring No.	B-7		
Sample No.	5-ST	Initial Moisture Content (%)	33.2
Depth (ft.)	15	Final Moisture Content (%)	34.0
Elevation	4 ft	Natural Density (pcf)	111.8
Liquid Limit		Initial Dry Density (pcf)	84
Plastic Limit		Final Dry Density (pcf)	91.9
Specimen Diameter (in.)	2.42	Collapse @ 2,000 psf	0.3%
Initial Specimen Thickness (in.)	1.00		

Sample inundated at 2000 psf pressure

Project:	PS Playa Vista
Client:	Public Storage
Project No.:	2G-1806003
Figure No.:	5

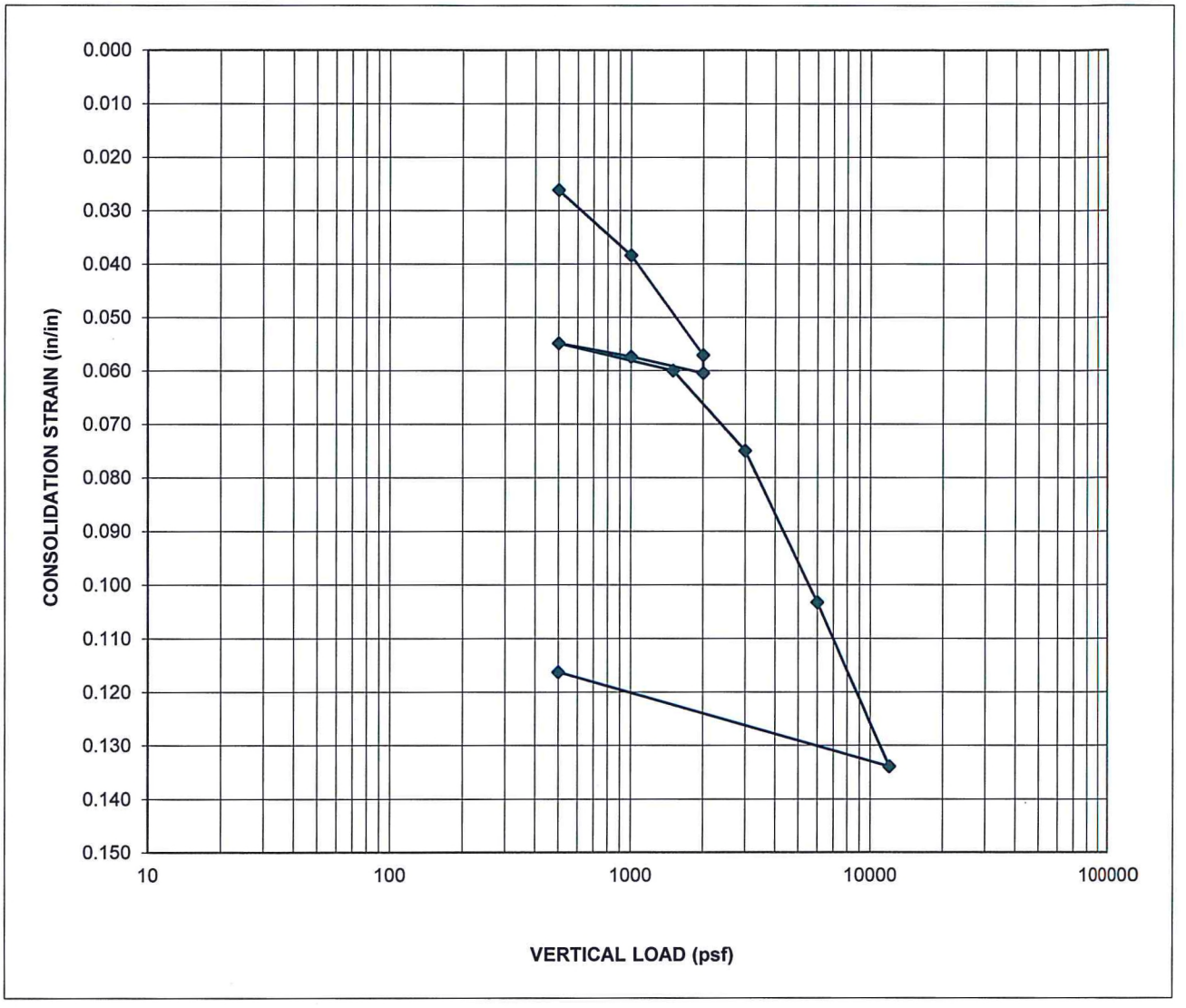
GILES ENGINEERING ASSOCIATES, INC.

-GEOTECHNICAL, ENVIRONMENTAL, AND CONSTRUCTION MATERIALS-

1965 NORTH MAIN STREET, ORANGE, CALIFORNIA

OFFICE: 714-279-0817 FAX : 714-279-9687

CONSOLIDATION / SWELL TEST ASTM D2435/ASTM D4546



Classification	Sandy Silt, trace Clay		
Boring No.	B-8		
Sample No.	6-ST	Initial Moisture Content (%)	26.8
Depth (ft.)	15	Final Moisture Content (%)	27.0
Elevation	4 ft	Natural Density (pcf)	109.7
Liquid Limit		Initial Dry Density (pcf)	86.5
Plastic Limit		Final Dry Density (pcf)	94.6
Specimen Diameter (in.)	2.42	Collapse @ 2,000 psf	0.3%
Initial Specimen Thickness (in.)	1.00		

Sample inundated at 2000 psf pressure

Project:	PS Playa Vista
Client:	Public Storage
Project No.:	2G-1806003
Figure No.:	6

GILES ENGINEERING ASSOCIATES, INC.

-GEOTECHNICAL, ENVIRONMENTAL, AND CONSTRUCTION MATERIALS-

1965 NORTH MAIN STREET, ORANGE, CALIFORNIA

OFFICE: 714-279-0817 FAX : 714-279-9687

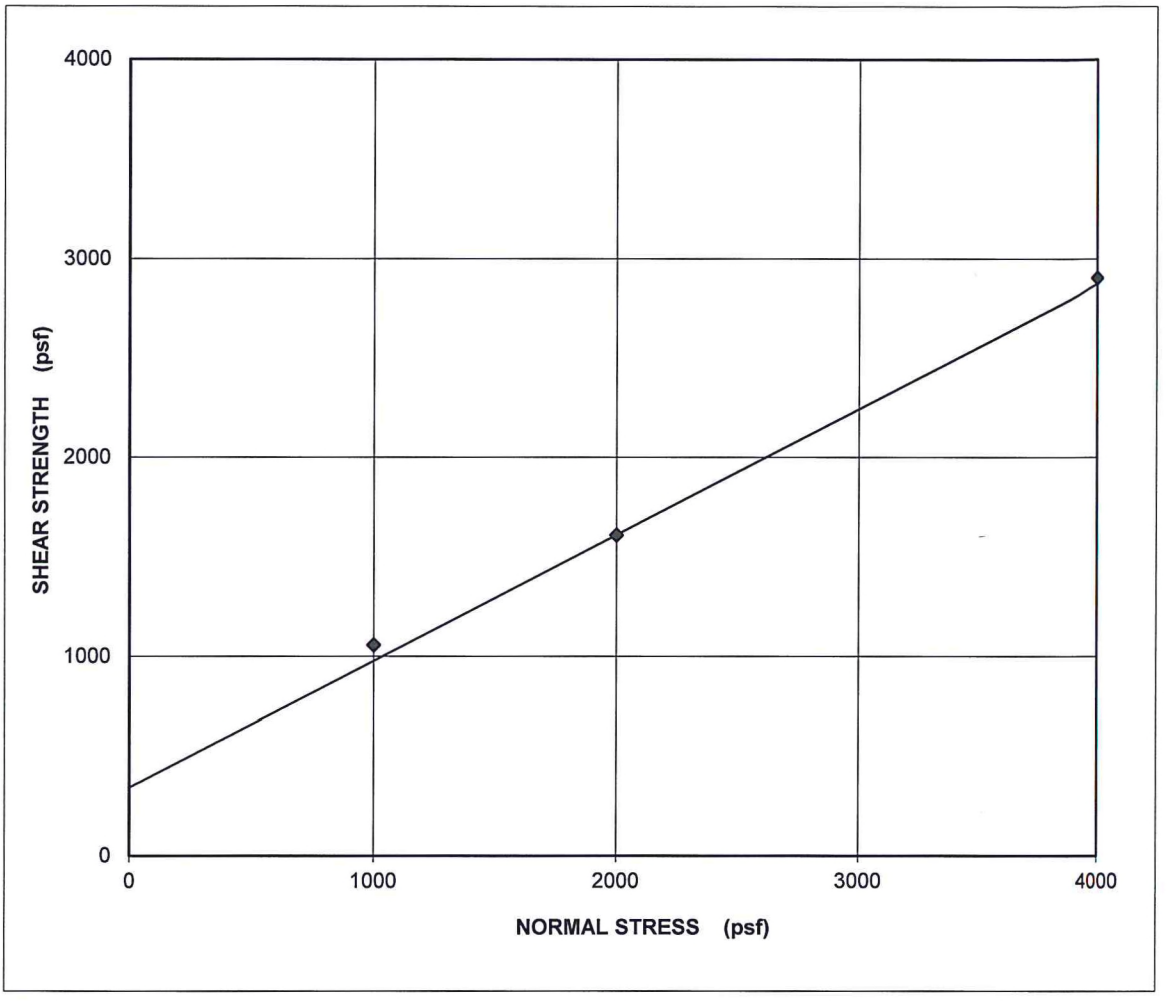
Giles Engineering Associates, Inc.

GEOTECHNICAL, ENVIRONMENTAL AND CONSTRUCTION MATERIALS CONSULTANTS

1965 N. MAIN STREET, ORANGE, CA 92865

OFFICE: 714-279-0817 FAX: 714-279-9687

DIRECT SHEAR TEST (ASTM D3080)



Classification	Fine Sand, some Silt		
Boring No.	B-4 Depth	11.5 to 14.0 feet (El. 4.0 ft)	
		Initial Specimen Properties:	
		Diameter (in.)	2.4
		Height (in.)	1.0
PROJECT:	Public Storage - Los Angeles	Moisture Content (%)	24
		Remolded Density (pcf)	
CLIENT:	Public Storage	Dry Density (pcf)	93.5
		LL	
PROJECT NO.:	2G-1806003	PL	NP
DATE:	8/9/2018	C (psf)	300
FIGURE	7	PHI (degrees)	32

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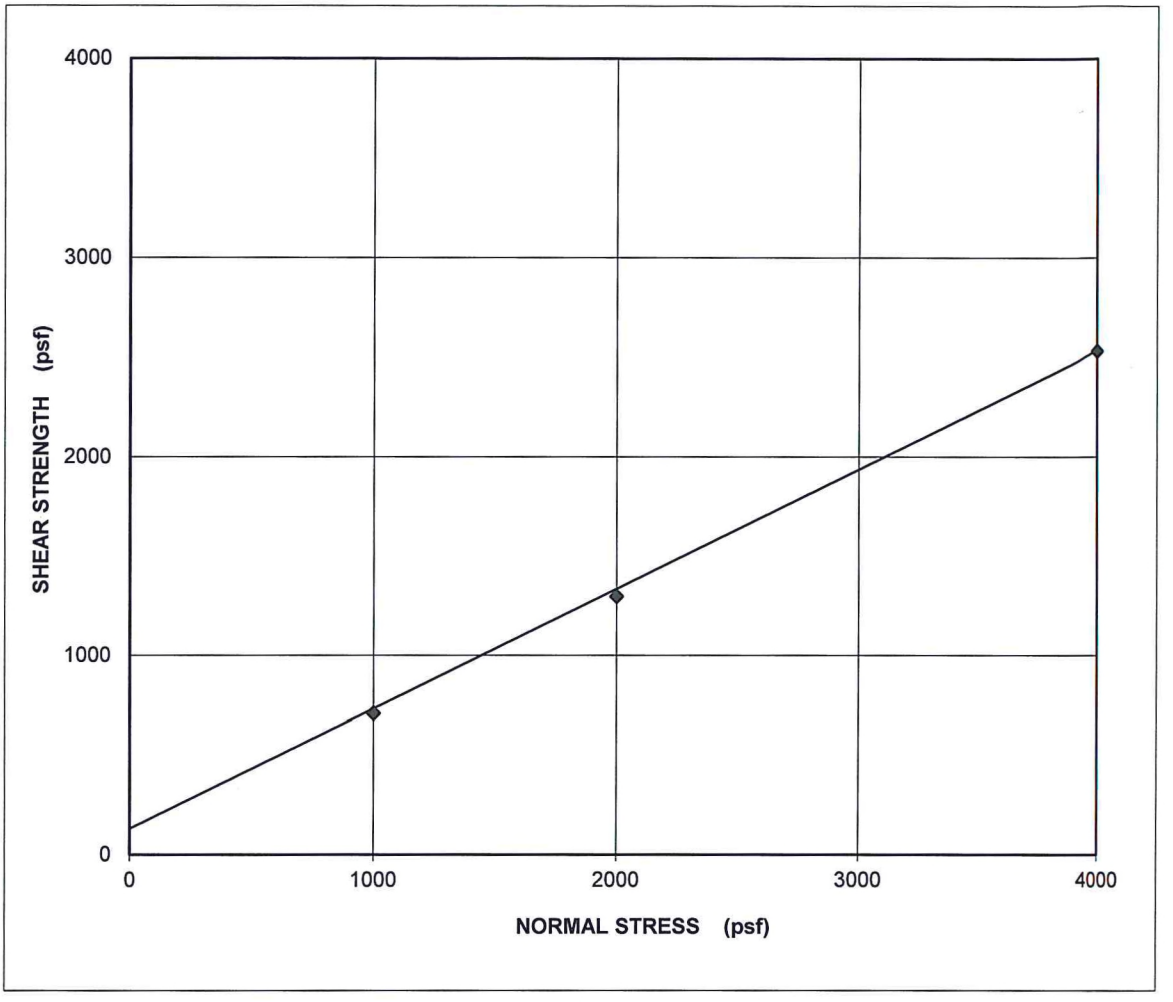
DIRECT SHEAR TEST (ASTM D3080)



Classification: Silt trace fine Sand

Boring No.: B-9 Depth: 5.5 ft. (El. 9.5 ft)

PROJECT:	Public Storage - Los Angeles
CLIENT:	Public Storage
PROJECT NO.:	2G-1806003
DATE:	10/1/2018
FIGURE	8

Initial Specimen Properties:

Diameter (in.)	2.4
Height (in.)	1.0
Moisture Content (%)	26
Remolded Density (pcf)	
Dry Density (pcf)	82.6
LL	
PL	NP
C (psf)	100
PHI (degrees)	31

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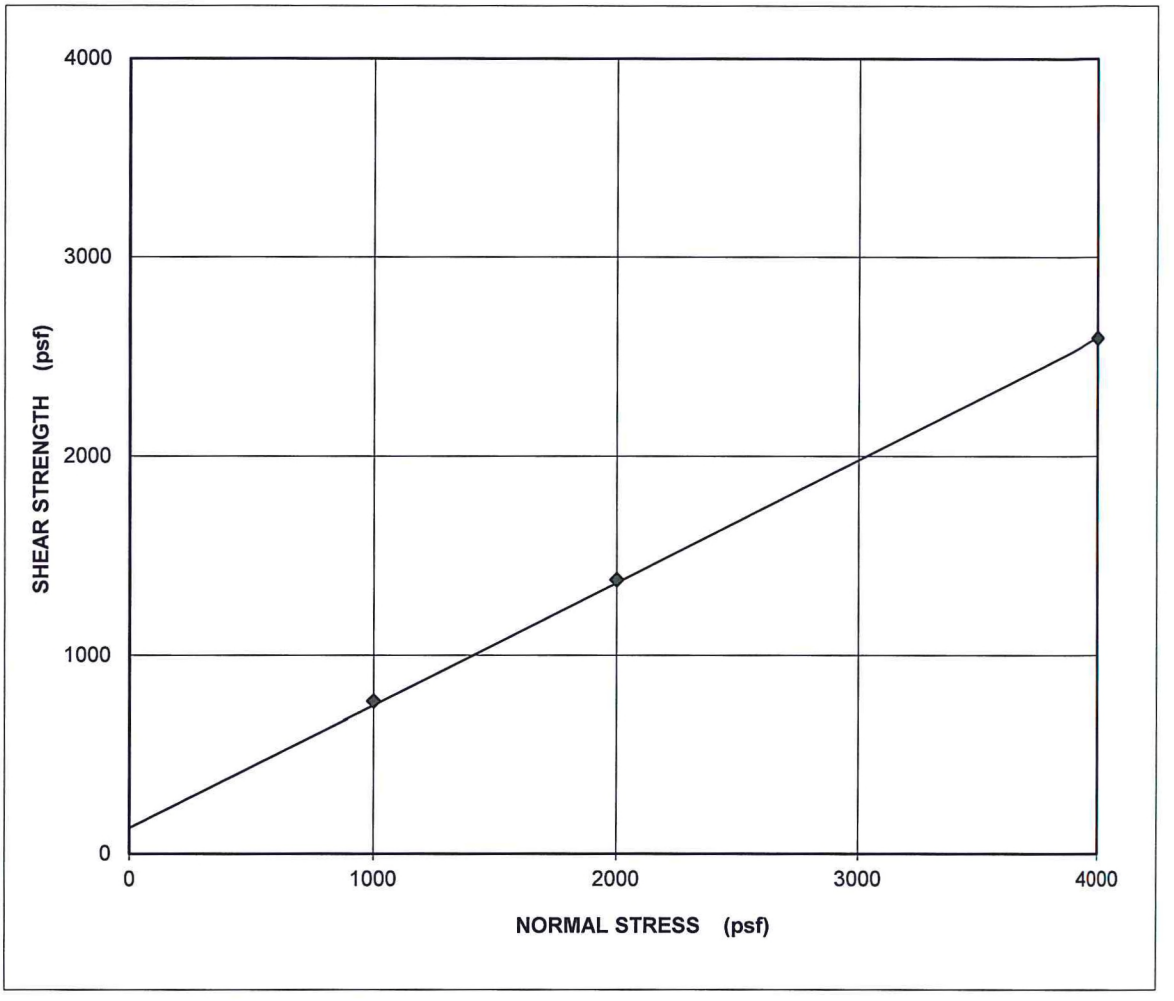
DIRECT SHEAR TEST (ASTM D3080)



Classification	Sandy Silt		
Boring No.	B-7 Depth 10 ft. (El. 9 ft)		
		Initial Specimen Properties:	
		Diameter (in.)	2.4
		Height (in.)	1.0
PROJECT:	Public Storage - Los Angeles	Moisture Content (%)	32
		Remolded Density (pcf)	
CLIENT:	Public Storage	Dry Density (pcf)	84.1
		LL	
PROJECT NO.:	2G-1806003	PL	
DATE:	2/13/2019	C (psf)	100
FIGURE	9	PHI (degrees)	32

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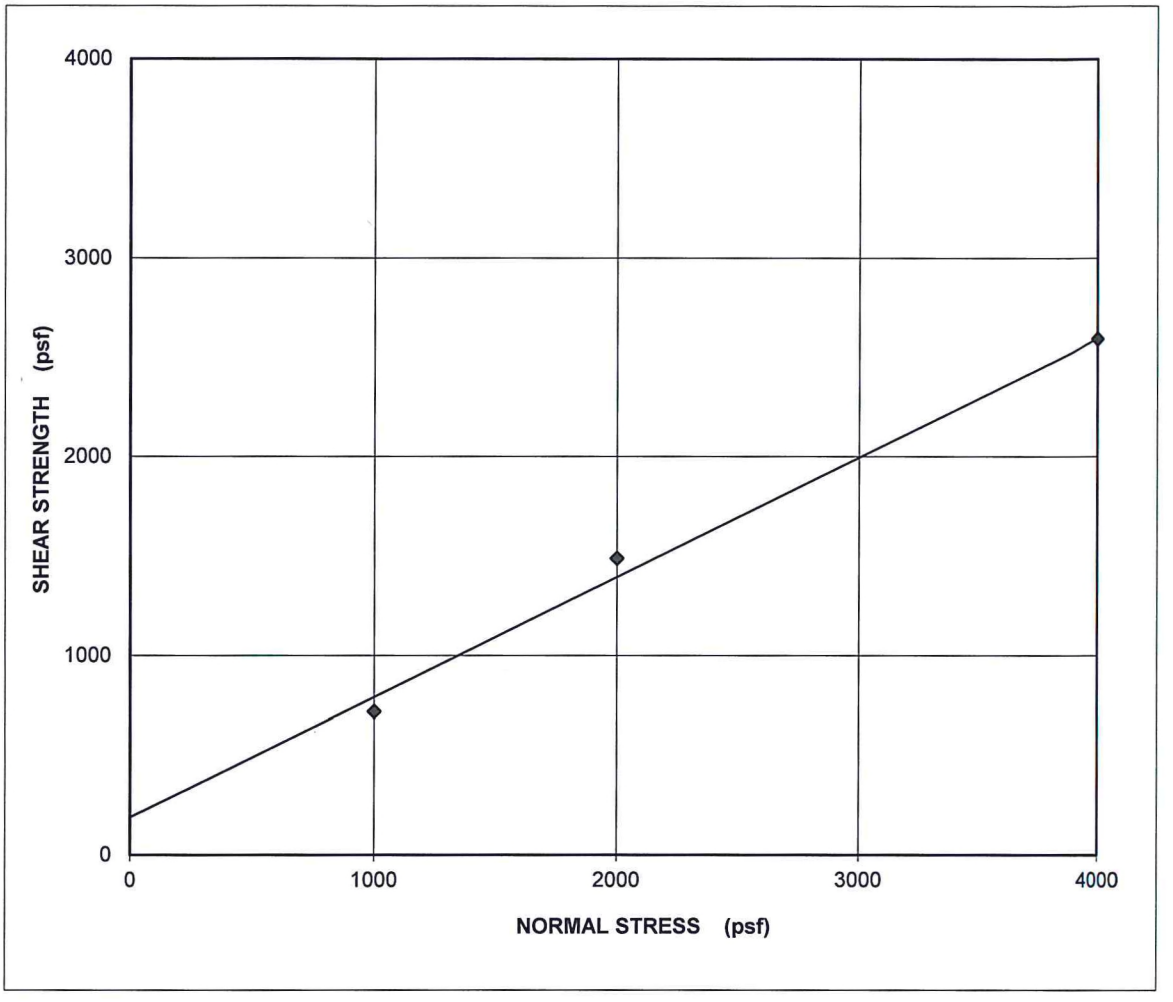
DIRECT SHEAR TEST (ASTM D3080)



Classification Silt

Boring No. B-8 Depth 10 ft. (El. 9 ft)

PROJECT: Public Storage - Los Angeles

CLIENT: Public Storage

PROJECT NO.: 2G-1806003

DATE: 2/14//2019

FIGURE 10

Initial Specimen Properties:	
Diameter (in.)	2.4
Height (in.)	1.0
Moisture Content (%)	32
Remolded Density (pcf)	
Dry Density (pcf)	84.1
LL	
PL	
C (psf)	200
PHI (degrees)	31

BORING NO. & LOCATION: B-1	TEST BORING LOG	GILES ENGINEERING ASSOCIATES, INC.
SURFACE ELEVATION: 18 feet	PROPOSED PUBLIC STORAGE 3-STORY BUILDING	
COMPLETION DATE: 07/10/18	12681 W. JEFFERSON BOULEVARD LOS ANGELES, CA	
FIELD REP: TREVOR SLAZAS	PROJECT NO: 2G-1806003	

MATERIAL DESCRIPTION	Depth (ft)	Elevation	Sample No. & Type	N	Q_u (tsf)	Q_p (tsf)	Q_s (tsf)	W (%)	PID	NOTES
Brown Clayey fine Sand - Damp (Fill)			1-SS	10				13	BDL	El=9
Brown Silty fine Sand - Moist (Fill to Possible Fill)			2-SS	12				9	BDL	Very low composite sample
			3-SS	7		2.5		30	BDL	LL=52 PI=27
Gray Silty Clay - Very Moist	10	10	4-SS	9		2.75		32	BDL	Dd=90.7 pcf
Dark Brown Silty Clay - Very Moist			5-SS	5		2.5		29	BDL	LL=52 PI=30 Dd=93.2 pcf
	20	0	6-SS	6		2.5		32	BDL	Dd=92.8 pcf
Dark Gray Silt, some fine Sand - Very Moist			7-SS	8				29	BDL	LL=34 PI=5 P_{200}=78%
Brown fine to coarse Sand, little Silt - Wet	30	-10	8-SS	25				14	BDL	P_{200}=11%
Gray to Dark Gray fine to coarse Sandy Silt - Very Moist to Wet			9-SS	15				21	BDL	LL=27 PI=3 P_{200}=63%
	40	-20	10-SS	8				17	BDL	LL=30 PI=3
Dark Gray Clay - Wet			11-SS	7		3.0		29	BDL	LL=44 PI=20 P_{200}=81%
		-30								
Gray fine to coarse Sandy Silt - Very Moist	50		12-SS	38				28	BDL	
Gray fine to coarse Sand - Wet			13-SS	22				29	14	
		-40								
	60		14-SS	50/6"					BDL	
Boring Terminated at about 66.5 feet (EL. -48.5')										

Water Observation Data	Remarks:
Water Encountered During Drilling: 25 ft.	SS = Standard Penetration Test
Water Level At End of Drilling:	BDL = Below Detection Limit
Cave Depth At End of Drilling:	
Water Level After Drilling:	
Cave Depth After Drilling:	

Changes in strata indicated by the lines are approximate boundary between soil types. The actual transition may be gradual and may vary considerably between test borings. Location of test boring is shown on the Boring Location Plan.

GILES LOG REPORT 2G-1806003.GPJ GILES.GDT 3/21/19

BORING NO. & LOCATION: B-2/P-2	TEST BORING LOG	GILES ENGINEERING ASSOCIATES, INC.
SURFACE ELEVATION: 22.5 feet	PROPOSED PUBLIC STORAGE 3-STORY BUILDING	
COMPLETION DATE: 07/10/18	12681 W. JEFFERSON BOULEVARD LOS ANGELES, CA	
FIELD REP: TREVOR SLAZAS	PROJECT NO: 2G-1806003	

MATERIAL DESCRIPTION	Depth (ft)	Elevation	Sample No. & Type	N	Q_u (tsf)	Q_p (tsf)	Q_s (tsf)	W (%)	PID	NOTES
Brown Silty fine Sand, trace Gravel - Moist to Very Moist (Fill to Possible Fill)										
			1-SS	12				7	BDL	
	2.5	20.0								
			2-SS	18				10	BDL	P_{200}=41%
	5.0	17.5								
Boring Terminated at about 5 feet (EL. 17.5')										

	Water Observation Data	Remarks:
▽	Water Encountered During Drilling: None	SS = Standard Penetration Test
▼	Water Level At End of Drilling:	BDL = Below Detection Limit
	Cave Depth At End of Drilling:	
▼	Water Level After Drilling:	
	Cave Depth After Drilling:	

GILES LOG REPORT 2G-1806003.GPJ GILES.GDT 3/21/19

Changes in strata indicated by the lines are approximate boundary between soil types. The actual transition may be gradual and may vary considerably between test borings. Location of test boring is shown on the Boring Location Plan.

BORING NO. & LOCATION: B-3	TEST BORING LOG	GILES ENGINEERING ASSOCIATES, INC.
SURFACE ELEVATION: 15 feet	PROPOSED PUBLIC STORAGE 3-STORY BUILDING	
COMPLETION DATE: 07/10/18	12681 W. JEFFERSON BOULEVARD LOS ANGELES, CA	
FIELD REP: TREVOR SLAZAS	PROJECT NO: 2G-1806003	

MATERIAL DESCRIPTION	Depth (ft)	Elevation	Sample No. & Type	N	Q_u (tsf)	Q_p (tsf)	Q_s (tsf)	W (%)	PID	NOTES
Brown Sandy Silt - Damp (Fill)			1-SS	12				8	BDL	
Brown Silty Sand, trace Gravel - Very Moist	5	10	2-CS	22				19	BDL	Dd=96.4 pcf
Light Brown Silt, trace fine Sand - Very Moist			3-CS	18				24	BDL	Dd=95.7 pcf
Brown Silty fine Sand - Very Moist	10	5	4-SS	8				30	BDL	
Black Silty Clay - Very Moist	15	0	5-SS	3				32	BDL	
			6-ST					32	BDL	Dd=84.1 pcf
Brown Silt, trace Clay and fine Sand - Very Moist	20	-5	7-SS	5				30	BDL	
Brown Silty fine Sand - Very Moist	▽ 25	-10	8-CS	12				30	BDL	Dd=89.5 pcf
Boring Terminated at about 26.5 feet (EL. -11.5')										

Water Observation Data	Remarks:
▽ Water Encountered During Drilling: 25 ft.	CS = California Split Spoon
▼ Water Level At End of Drilling:	SS = Standard Penetration Test
Cave Depth At End of Drilling:	BDL = Below Detection Limit
▼ Water Level After Drilling:	
Cave Depth After Drilling:	

GILES LOG REPORT 2G-1806003.GPJ GILES.GDT 3/21/19

Changes in strata indicated by the lines are approximate boundary between soil types. The actual transition may be gradual and may vary considerably between test borings. Location of test boring is shown on the Boring Location Plan.

BORING NO. & LOCATION: B-4	TEST BORING LOG	GILES ENGINEERING ASSOCIATES, INC.
SURFACE ELEVATION: 16 feet	PROPOSED PUBLIC STORAGE 3-STORY BUILDING	
COMPLETION DATE: 07/10/18	12681 W. JEFFERSON BOULEVARD LOS ANGELES, CA	
FIELD REP: TREVOR SLAZAS	PROJECT NO: 2G-1806003	

MATERIAL DESCRIPTION	Depth (ft)	Elevation	Sample No. & Type	N	Q_u (tsf)	Q_p (tsf)	Q_s (tsf)	W (%)	PID	NOTES
Brown Clayey fine Sand - Moist (Fill)			1-SS	14		4.5+		13	BDL	
Brown Sandy Clay - Moist (Fill)			2-SS	7				13	BDL	
Light Brown fine Sandy Silt - Moist		10	3-SS	6				20	BDL	Dd=93.3 pcf P_{200}=69% LL=38 PI=8
Brown fine Sand, some Silt - Very Moist	10		4-SS	10				26	BDL	P_{200}=34%
			5-ST					24	BDL	Dd=93.5 pcf
Dark Brown Clay - Very Moist		0	6-SS	5		2.25		34	BDL	LL=56 PI=28 Dd=94.5 pcf
Dark Gray Clayey Silt, little fine Sand - Very Moist	▽ 20		7-SS	6				22	BDL	LL=31 PI=6 P_{200}=84% Dd=102.1 pcf
Gray to Reddish Brown Sandy Silt - Very Moist		-10	8-SS	7				28	BDL	P_{200}=54% LL=30 PI=4
Gray fine Sandy Clay - Very Moist	30		9-SS	3		1.5		32	BDL	P_{200}=81%
		-20	10-SS	4		1.5		31	BDL	LL=41 PI=18
Dark Gray Silt, some fine Sand - Wet	40		11-SS	11				29	BDL	LL=30 PI=3 P_{200}=75%
Dark Gray fine Sandy Clay - Wet		-30	12-SS	6				22	BDL	P_{200}=53% LL=29 PI=7
Gray fine to coarse Sand, some Gravel - Wet	50		13-SS	29				8	BDL	
No recovery		-40	14-SS	41					BDL	
Gray fine to coarse Sand - Wet	60		15-SS	42				13	BDL	
		-50								
Boring Terminated at about 66.5 feet (EL. -50.5')										

Water Observation Data	Remarks:
▽ Water Encountered During Drilling: 20 ft.	SS = Standard Penetration Test
▼ Water Level At End of Drilling:	BDL = Below Detection Limit
Cave Depth At End of Drilling:	
▼ Water Level After Drilling:	
Cave Depth After Drilling:	

GILES LOG REPORT 2G-1806003.GPJ GILES.GDT 3/21/19

Changes in strata indicated by the lines are approximate boundary between soil types. The actual transition may be gradual and may vary considerably between test borings. Location of test boring is shown on the Boring Location Plan.

BORING NO. & LOCATION: B-5/P-1	TEST BORING LOG	GILES ENGINEERING ASSOCIATES, INC.
SURFACE ELEVATION: 15 feet	PROPOSED PUBLIC STORAGE 3-STORY BUILDING	
COMPLETION DATE: 07/10/18	12681 W. JEFFERSON BOULEVARD LOS ANGELES, CA	
FIELD REP: TREVOR SLAZAS	PROJECT NO: 2G-1806003	

MATERIAL DESCRIPTION	Depth (ft)	Elevation	Sample No. & Type	N	Q_u (tsf)	Q_p (tsf)	Q_s (tsf)	W (%)	PID	NOTES
Brown Silt, some fine Sand and Gravel - Moist (Fill)										
			1-SS	10				10	BDL	
	2.5	12.5								
			2-SS	6				15	BDL	P_{200}=67%
	5.0	10.0								
Boring Terminated at about 5 feet (EL. 10')										

Water Observation Data	Remarks:
Water Encountered During Drilling: None	SS = Standard Penetration Test
Water Level At End of Drilling:	BDL = Below Detection Limit
Cave Depth At End of Drilling:	
Water Level After Drilling:	
Cave Depth After Drilling:	

Changes in strata indicated by the lines are approximate boundary between soil types. The actual transition may be gradual and may vary considerably between test borings. Location of test boring is shown on the Boring Location Plan.

BORING NO. & LOCATION: B-6	TEST BORING LOG	GILES ENGINEERING ASSOCIATES, INC.
SURFACE ELEVATION: 22 feet	PROPOSED PUBLIC STORAGE 3-STORY BUILDING	
COMPLETION DATE: 01/22/19	12681 W. JEFFERSON BOULEVARD LOS ANGELES, CA	
FIELD REP: VICTOR GUADALUPE	PROJECT NO: 2G-1806003	

MATERIAL DESCRIPTION	Depth (ft)	Elevation	Sample No. & Type	N	Q_u (tsf)	Q_p (tsf)	Q_s (tsf)	W (%)	PID	NOTES
Brown Sandy Clayey Silt - Moist (Possible Fill)		20	1-SS	7		4.5+		13	BDL	
Brown Clayey Sandy Silt - Moist (Possible Fill)			2-SS	10		4.5+		8	BDL	
			3-SS	9		4.5+		12	BDL	
Brown fine to medium Sandy Silt - Moist	10	10	4-CS	17		4.5+		19	BDL	Dd=108.0 pcf
Brownish-Gray fine Sandy Silt - Very Moist			5-SS	6		2.5		27	BDL	
Greenish-Gray Silt - Very Moist			6-SS	6		2.0		36	BDL	
Light Gray-Brown fine Sand, trace Silt - Very Moist	20	0	7-SS	6				38	BDL	
			8-SHELBY						BDL	
Black Silty Clay - Very Moist	▽		9-SS	6		1.5		35	BDL	
			10-SS	7		1.75		35	BDL	
Bluish Gray Silty Clay - Very Moist	30	-10	11-SS	8		1.5		43	BDL	
			12-SHELBY						BDL	
Brown fine to medium Sand - Wet			13-SS	20				22	BDL	
Brown fine Sandy Silt - Wet	40	-20	14-SS	6				30	BDL	
Dark Brown fine Silty Clay - Very Moist			15-SS	6				45	BDL	
Dark Gray Clayey Silt - Very Moist	50	-30	16-SS	8				34	BDL	
Gray Silty fine Sand - Wet			17-SS	12				25	BDL	
Boring Terminated at about 56.5 feet (EL. -34.5')										

Water Observation Data	Remarks:
▽ Water Encountered During Drilling: 27 ft.	CS = California Split Spoon
▼ Water Level At End of Drilling:	SS = Standard Penetration Test
Cave Depth At End of Drilling:	
▼ Water Level After Drilling:	
Cave Depth After Drilling:	

GILES LOG REPORT 2G-1806003.GPJ GILES.GDT 3/21/19

Changes in strata indicated by the lines are approximate boundary between soil types. The actual transition may be gradual and may vary considerably between test borings. Location of test boring is shown on the Boring Location Plan.

BORING NO. & LOCATION: B-7	TEST BORING LOG	GILES ENGINEERING ASSOCIATES, INC.
SURFACE ELEVATION: 19 feet	PROPOSED PUBLIC STORAGE 3-STORY BUILDING	
COMPLETION DATE: 01/22/19	12681 W. JEFFERSON BOULEVARD LOS ANGELES, CA	
FIELD REP: TREVOR SLAZAS	PROJECT NO: 2G-1806003	

MATERIAL DESCRIPTION	Depth (ft)	Elevation	Sample No. & Type	N	Q_u (tsf)	Q_p (tsf)	Q_s (tsf)	W (%)	PID	NOTES
Brown Sandy Silty Clay - Moist (Possible Fill)			1-SS	9		2.75		21	BDL	
Brown Sandy Clayey Silt - Moist			2-SS	11		2.25		18	BDL	
			3-SS	11		3.75		19	BDL	
	10	10								
Light Brown fine Sandy Silt - Very Moist			4-CS	11		3.0		32	BDL	Dd=84.1 pcf
Light Brown Silty Clay - Very Moist			5-SS	5		2.0		37	BDL	
			6-SHELBY					35	BDL	Dd=92.1 pcf
Brown Silty Clay - Very Moist		0	7-SS	6		1.25		31	BDL	
	▽ 20									
Dark Brown Silty Clay - Wet			8-SS	5				38	BDL	
Brownish-Gray Silty Clay - Very Moist			9-SS	6		1.25		40	BDL	
			10-SHELBY						BDL	
Brown fine Silty Clay - Wet		-10	11-SS	7		1.5		34	BDL	
	30									
Dark Brown Clayey Silt - Very Moist			12-SS	5				32	BDL	
... fine to medium Sand, trace coarse Sand - Wet			13-SS	23				21	BDL	
		-20								
	40									
Gray fine Sandy Clayey Silt - Very Moist			14-SS	5				29	BDL	
Dark Brown Clayey Silt - Very Moist			15-SS	7				40	BDL	
		-30								
	50									
Gray fine to medium Sand, trace Gravel - Wet			16-SS	36				13	BDL	
Light Gray fine to medium Sand - Wet			17-SS	11				15	BDL	
Boring Terminated at about 56.5 feet (EL. -37.5')										

	Water Observation Data	Remarks:
▽	Water Encountered During Drilling: 20 ft.	CS = California Split Spoon
▼	Water Level At End of Drilling:	SS = Standard Penetration Test
	Cave Depth At End of Drilling:	
▼	Water Level After Drilling:	
	Cave Depth After Drilling:	

GILES LOG REPORT 2G-1806003.GPJ GILES.GDT 3/21/19

Changes in strata indicated by the lines are approximate boundary between soil types. The actual transition may be gradual and may vary considerably between test borings. Location of test boring is shown on the Boring Location Plan.

BORING NO. & LOCATION: B-8	TEST BORING LOG	GILES ENGINEERING ASSOCIATES, INC.
SURFACE ELEVATION: 19 feet	PROPOSED PUBLIC STORAGE 3-STORY BUILDING	
COMPLETION DATE: 01/22/19	12681 W. JEFFERSON BOULEVARD LOS ANGELES, CA	
FIELD REP: TREVOR SLAZAS	PROJECT NO: 2G-1806003	

MATERIAL DESCRIPTION	Depth (ft)	Elevation	Sample No. & Type	N	Q_u (tsf)	Q_p (tsf)	Q_s (tsf)	W (%)	PID	NOTES
Brown Silty fine Sand - Moist (Possible Fill)			1-SS	11				9		
Brown fine Sandy Silt - Moist			2-SS	18		4.5+		11		
Brown Sandy Silt - Moist		10	3-SS	14		4.5+		11		
Brown to Greenish-Gray Silt - Moist	10		4-CS	15		4.5+		22		Dd=94.1 pcf
Light Brown Silt - Moist			5-SS	6		1.5		35		Dd=95.1 pcf
Brown fine Sandy Silt, trace clay -			6-SHELBY							
Dark Gray Silty Clay - Very Moist		0	7-SS			1.25		27		
Dark Gray Clayey Silt - Very Moist	20		8-SS	6		1.75		34		
Greenish-Gray Silty Clay - Wet ▽			9-SS	6		1.5		37		
			10-SHELBY							
Gray Silty fine Sand - Very Moist		-10	11-SS	10				29		
Brownish-Gray Sandy Silt - Wet	30		12-SS	12				26		
Dark Gray Clayey fine Sand - Very Moist			13-SS	18				23		
Gray Clayey Silt - Moist	40	-20	14-SS	7				36		
Gray Clayey Silt - Wet			15-SS	12				32		
Gray Clayey fine Sand - Wet	50	-30	16-SS	12				18		
			17-SS	41				15		
Boring Terminated at about 56.5 feet (EL. -37.5')										

Water Observation Data	Remarks:
▽ Water Encountered During Drilling: 24.3 ft.	CS = California Split Spoon
▼ Water Level At End of Drilling:	SS = Standard Penetration Test
Cave Depth At End of Drilling:	
▼ Water Level After Drilling:	
Cave Depth After Drilling:	

GILES LOG REPORT 2G-1806003.GPJ GILES.GDT 3/21/19

Changes in strata indicated by the lines are approximate boundary between soil types. The actual transition may be gradual and may vary considerably between test borings. Location of test boring is shown on the Boring Location Plan.

BORING NO. & LOCATION: B-9	TEST BORING LOG	GILES ENGINEERING ASSOCIATES, INC.
SURFACE ELEVATION: 15 feet	PROPOSED PUBLIC STORAGE 3-STORY BUILDING	
COMPLETION DATE: 09/25/18	12681 W. JEFFERSON BOULEVARD LOS ANGELES, CA	
FIELD REP: CADE KLOCK	PROJECT NO: 2G-1806003	

MATERIAL DESCRIPTION	Depth (ft)	Elevation	Sample No. & Type	N[1]	Q_u (tsf)	Q_p (tsf)	Q_s (tsf)	W (%)	PID	NOTES
Brown Sandy Silt - Damp (Possible Fill)										
			1-SS	10				8		
	2.5	12.5								
Light Brown Silt, trace fine Sand - Very Moist										
	5.0	10.0								
			2-CS			2.0		26		Dd=82.6 pcf
Boring Terminated at about 6 feet (EL. 9')										

Water Observation Data	Remarks:
Water Encountered During Drilling: None	CS = California Split Spoon
Water Level At End of Drilling:	SS = Standard Penetration Test
Cave Depth At End of Drilling:	N[1] per ASTM STP 399
Water Level After Drilling:	
Cave Depth After Drilling:	

GILES LOG REPORT 2G-1806003.GPJ GILES.GDT 3/21/19

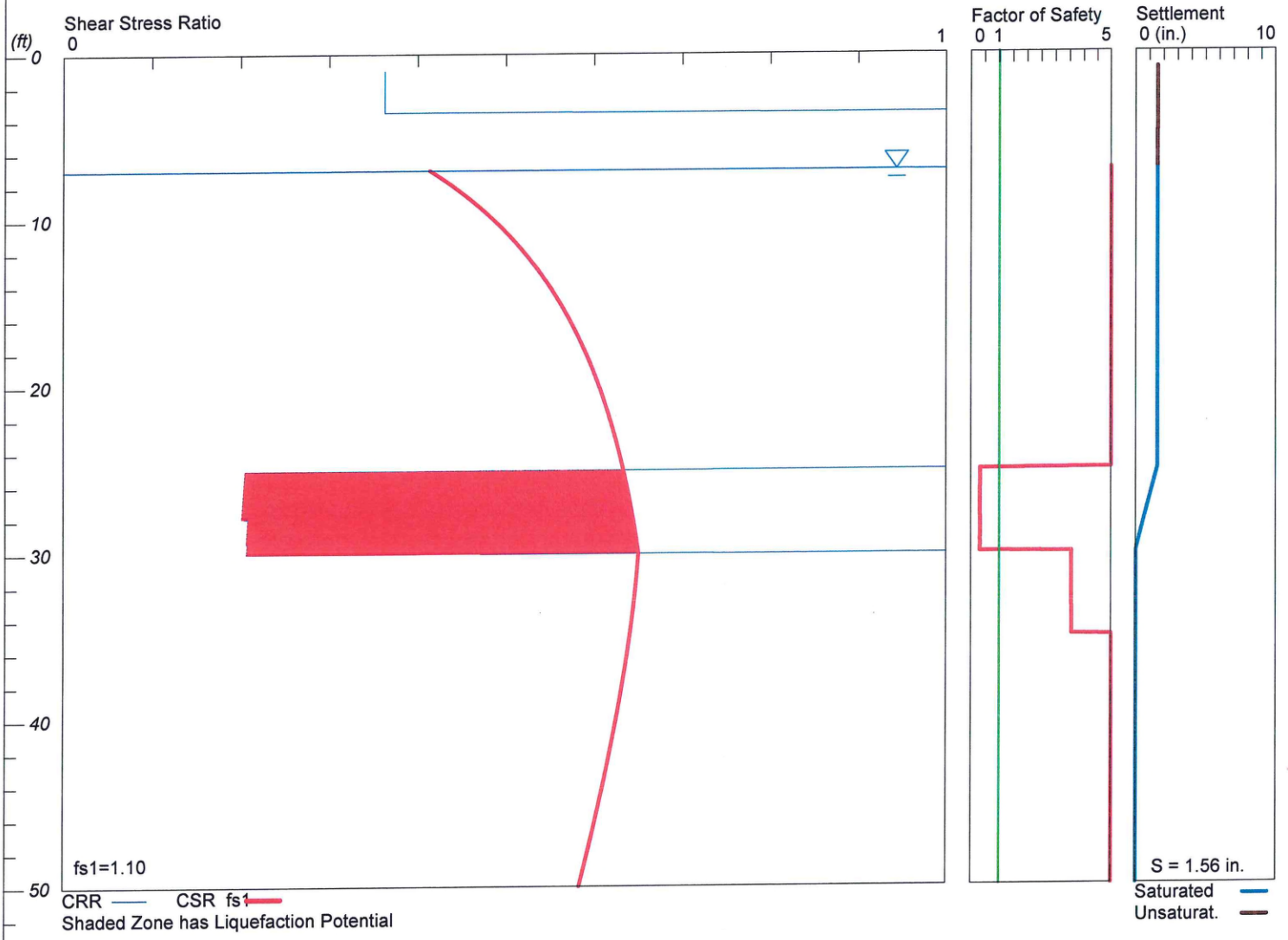
Changes in strata indicated by the lines are approximate boundary between soil types. The actual transition may be gradual and may vary considerably between test borings. Location of test boring is shown on the Boring Location Plan.

LIQUEFACTION ANALYSIS

PS LA Jefferson Blvd, Playa Vista,

Hole No.=B1 ***Water Depth=7 ft***

Magnitude=7.1
Acceleration=0.588g



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LIQUEFACTION ANALYSIS SUMMARY

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Input File Name: P:\John Maier\Public Storage\Geo\LA 3 - Playa Vista\B-1 8-3-18 10 in 50 2019CBC.liq
Title: PS LA Jefferson Blvd, Playa Vista,
Subtitle:

Surface Elev.=
Hole No.=B1
Depth of Hole= 50.00 ft
Water Table during Earthquake= 7.00 ft
Water Table during In-Situ Testing= 25.00 ft
Max. Acceleration= 0.59 g
Earthquake Magnitude= 7.10

Input Data:
Surface Elev.=
Hole No.=B1
Depth of Hole=50.00 ft
Water Table during Earthquake= 7.00 ft
Water Table during In-Situ Testing= 25.00 ft
Max. Acceleration=0.59 g
Earthquake Magnitude=7.10
No-Liquefiable Soils: CL, OL are Non-Liq. Soil

1. SPT or BPT Calculation.
2. Settlement Analysis Method: Ishihara / Yoshimine
3. Fines Correction for Liquefaction: Idriss/Seed
4. Fine Correction for Settlement: During Liquefaction*
5. Settlement Calculation in: All zones*
6. Hammer Energy Ratio, Ce = 1.25
7. Borehole Diameter, Cb= 1
8. Sampling Method, Cs= 1.2
9. User request factor of safety (apply to CSR) , User= 1.1
   Plot one CSR curve (fs1=User)
10. Use Curve Smoothing: No
* Recommended Options

In-Situ Test Data:

Depth ft	SPT	gamma pcf	Fines %
1.00	10.00	120.00	30.00
3.50	12.00	120.00	30.00
6.00	7.00	120.00	NoLiq
10.00	9.00	120.00	NoLiq
15.00	5.00	120.00	NoLiq
20.00	6.00	120.00	NoLiq
25.00	8.00	120.00	78.00
30.00	25.00	120.00	11.00
35.00	15.00	120.00	NoLiq
40.00	8.00	120.00	NoLiq
45.00	7.00	120.00	NoLiq

Output Results:
Settlement of Saturated Sands=1.53 in.
Settlement of Unsaturated Sands=0.02 in.
Total Settlement of Saturated and Unsaturated Sands=1.56 in.
Differential Settlement=0.778 to 1.027 in.

Depth ft	CRRm	CSRfs	F.S.	S_sat. in.	S_dry in.	S_all in.
1.00	0.36	0.42	5.00	1.53	0.02	1.56
2.00	0.36	0.42	5.00	1.53	0.02	1.55
3.00	0.36	0.42	5.00	1.53	0.01	1.55
4.00	2.30	0.42	5.00	1.53	0.01	1.54
5.00	2.30	0.42	5.00	1.53	0.00	1.54
6.00	2.00	0.41	5.00	1.53	0.00	1.53
7.00	2.00	0.41	5.00	1.53	0.00	1.53
8.00	2.00	0.44	5.00	1.53	0.00	1.53
9.00	2.00	0.47	5.00	1.53	0.00	1.53
10.00	2.00	0.49	5.00	1.53	0.00	1.53
11.00	2.00	0.51	5.00	1.53	0.00	1.53
12.00	2.00	0.52	5.00	1.53	0.00	1.53
13.00	2.00	0.54	5.00	1.53	0.00	1.53
14.00	2.00	0.55	5.00	1.53	0.00	1.53
15.00	2.00	0.56	5.00	1.53	0.00	1.53
16.00	2.00	0.57	5.00	1.53	0.00	1.53
17.00	2.00	0.58	5.00	1.53	0.00	1.53
18.00	2.00	0.59	5.00	1.53	0.00	1.53
19.00	2.00	0.60	5.00	1.53	0.00	1.53
20.00	2.00	0.61	5.00	1.53	0.00	1.53
21.00	2.00	0.61	5.00	1.53	0.00	1.53
22.00	2.00	0.62	5.00	1.53	0.00	1.53
23.00	2.00	0.62	5.00	1.53	0.00	1.53
24.00	2.00	0.63	5.00	1.53	0.00	1.53
25.00	2.00	0.63	5.00	1.53	0.00	1.53
26.00	0.20	0.64	0.32*	1.24	0.00	1.24
27.00	0.20	0.64	0.32*	0.93	0.00	0.93
28.00	0.21	0.64	0.32*	0.62	0.00	0.62
29.00	0.21	0.65	0.32*	0.32	0.00	0.32
30.00	0.21	0.65	0.32*	0.02	0.00	0.02
31.00	2.30	0.65	3.55	0.00	0.00	0.00
32.00	2.30	0.65	3.55	0.00	0.00	0.00
33.00	2.29	0.64	3.55	0.00	0.00	0.00
34.00	2.29	0.64	3.56	0.00	0.00	0.00
35.00	2.28	0.64	3.56	0.00	0.00	0.00
36.00	2.00	0.64	5.00	0.00	0.00	0.00
37.00	2.00	0.63	5.00	0.00	0.00	0.00
38.00	2.00	0.63	5.00	0.00	0.00	0.00
39.00	2.00	0.63	5.00	0.00	0.00	0.00
40.00	2.00	0.62	5.00	0.00	0.00	0.00
41.00	2.00	0.62	5.00	0.00	0.00	0.00
42.00	2.00	0.62	5.00	0.00	0.00	0.00
43.00	2.00	0.61	5.00	0.00	0.00	0.00
44.00	2.00	0.61	5.00	0.00	0.00	0.00
45.00	2.00	0.61	5.00	0.00	0.00	0.00
46.00	2.00	0.60	5.00	0.00	0.00	0.00
47.00	2.00	0.60	5.00	0.00	0.00	0.00
48.00	2.00	0.59	5.00	0.00	0.00	0.00
49.00	2.00	0.59	5.00	0.00	0.00	0.00
50.00	2.00	0.58	5.00	0.00	0.00	0.00

* F.S.<1, Liquefaction Potential Zone
(F.S. is limited to 5, CRR is limited to 2, CSR is limited to 2)

Units: Unit: qc, fs, Stress or Pressure = atm (1.0581tsf); Unit Weight = pcf; Depth = ft; Settlement = in.

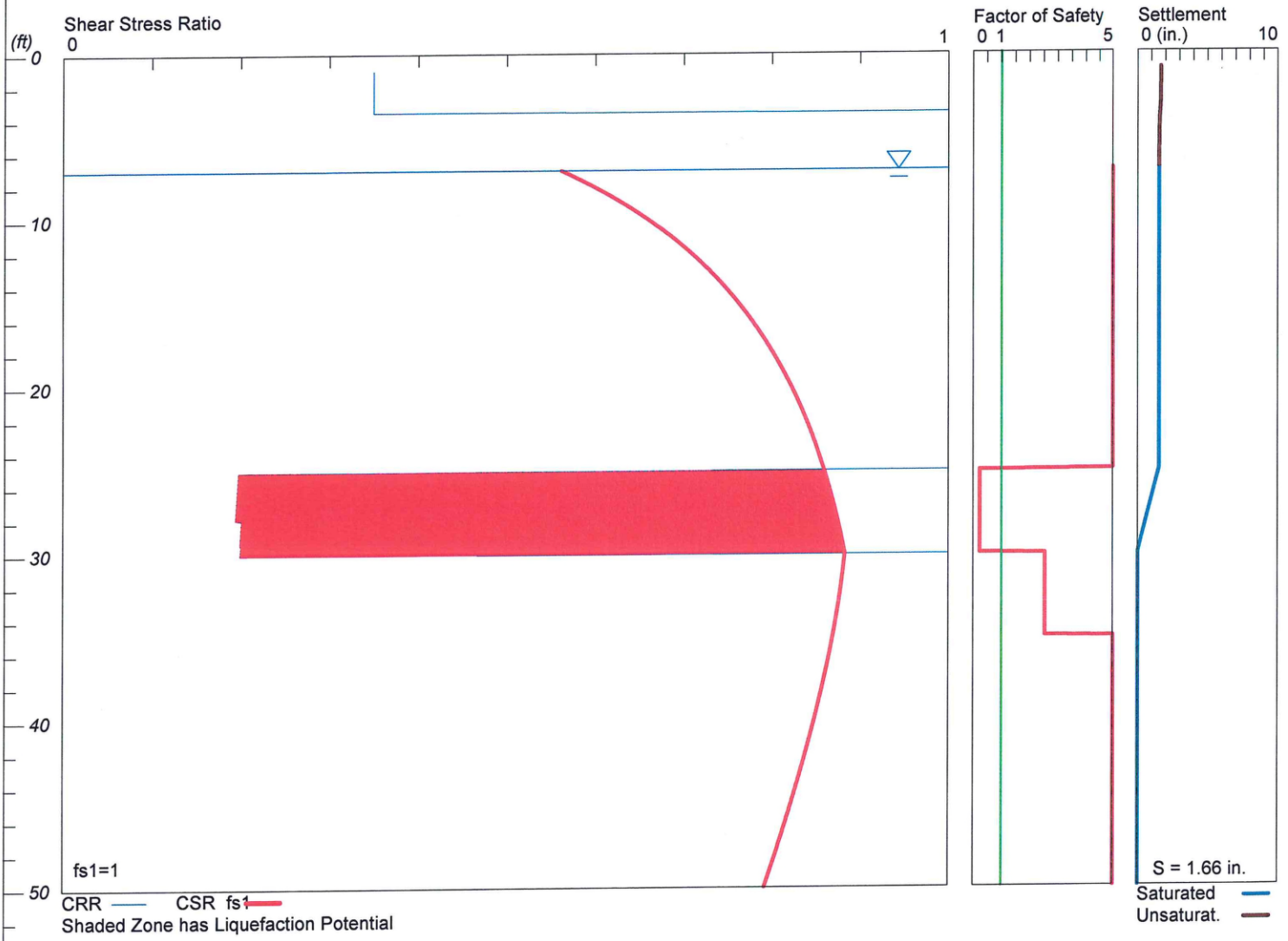
1 atm (atmosphere) = 1 tsf (ton/ft2)
CRRm Cyclic resistance ratio from soils
CSRsf Cyclic stress ratio induced by a given earthquake (with user request factor of safety)
F.S. Factor of Safety against liquefaction, F.S.=CRRm/CSRsf
S_sat Settlement from saturated sands
S_dry Settlement from Unsaturated Sands
S_all Total Settlement from Saturated and Unsaturated Sands
NoLiq No-Liquefy Soils

LIQUEFACTION ANALYSIS

PS LA Jefferson Blvd, Playa Vista,

Hole No.=B1 Water Depth=7 ft

Magnitude=7.2
Acceleration=0.878g



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LIQUEFACTION ANALYSIS SUMMARY

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Input File Name: P:\John Maier\Public Storage\Geo\LA 3 - Playa Vista\B-1 8-3-18 2 in 50 2019CBC.liq
Title: PS LA Jefferson Blvd, Playa Vista,
Subtitle:

Surface Elev.=
Hole No.=B1
Depth of Hole= 50.00 ft
Water Table during Earthquake= 7.00 ft
Water Table during In-Situ Testing= 25.00 ft
Max. Acceleration= 0.88 g
Earthquake Magnitude= 7.20

Input Data:
Surface Elev.=
Hole No.=B1
Depth of Hole=50.00 ft
Water Table during Earthquake= 7.00 ft
Water Table during In-Situ Testing= 25.00 ft
Max. Acceleration=0.88 g
Earthquake Magnitude=7.20
No-Liquefiable Soils: CL, OL are Non-Liq. Soil

1. SPT or BPT Calculation.
2. Settlement Analysis Method: Ishihara / Yoshimine
3. Fines Correction for Liquefaction: Idriss/Seed
4. Fine Correction for Settlement: During Liquefaction*
5. Settlement Calculation in: All zones*
6. Hammer Energy Ratio, Ce = 1.25
7. Borehole Diameter, Cb= 1
8. Sampling Method, Cs= 1.2
9. User request factor of safety (apply to CSR) , User= 1.0
   Plot one CSR curve (fs1=1)
10. Use Curve Smoothing: No
* Recommended Options

In-Situ Test Data:

Depth ft	SPT	gamma pcf	Fines %
1.00	10.00	120.00	30.00
3.50	12.00	120.00	30.00
6.00	7.00	120.00	NoLiq
10.00	9.00	120.00	NoLiq
15.00	5.00	120.00	NoLiq
20.00	6.00	120.00	NoLiq
25.00	8.00	120.00	78.00
30.00	25.00	120.00	11.00
35.00	15.00	120.00	NoLiq
40.00	8.00	120.00	NoLiq
48.50	7.00	120.00	NoLiq

Output Results:

Settlement of Saturated Sands=1.53 in.
Settlement of Unsaturated Sands=0.13 in.
Total Settlement of Saturated and Unsaturated Sands=1.66 in.
Differential Settlement=0.831 to 1.097 in.

Depth ft	CRRm	CSRfs	F.S.	S_sat. in.	S_dry in.	S_all in.
1.00	0.35	0.57	5.00	1.53	0.13	1.66
2.00	0.35	0.57	5.00	1.53	0.12	1.66
3.00	0.35	0.57	5.00	1.53	0.11	1.64
4.00	2.22	0.57	5.00	1.53	0.04	1.57
5.00	2.22	0.56	5.00	1.53	0.02	1.55
6.00	2.00	0.56	5.00	1.53	0.00	1.53
7.00	2.00	0.56	5.00	1.53	0.00	1.53
8.00	2.00	0.60	5.00	1.53	0.00	1.53
9.00	2.00	0.63	5.00	1.53	0.00	1.53
10.00	2.00	0.66	5.00	1.53	0.00	1.53
11.00	2.00	0.69	5.00	1.53	0.00	1.53
12.00	2.00	0.71	5.00	1.53	0.00	1.53
13.00	2.00	0.73	5.00	1.53	0.00	1.53
14.00	2.00	0.75	5.00	1.53	0.00	1.53
15.00	2.00	0.76	5.00	1.53	0.00	1.53
16.00	2.00	0.78	5.00	1.53	0.00	1.53
17.00	2.00	0.79	5.00	1.53	0.00	1.53
18.00	2.00	0.80	5.00	1.53	0.00	1.53
19.00	2.00	0.81	5.00	1.53	0.00	1.53
20.00	2.00	0.82	5.00	1.53	0.00	1.53
21.00	2.00	0.83	5.00	1.53	0.00	1.53
22.00	2.00	0.84	5.00	1.53	0.00	1.53
23.00	2.00	0.85	5.00	1.53	0.00	1.53
24.00	2.00	0.85	5.00	1.53	0.00	1.53
25.00	2.00	0.86	5.00	1.53	0.00	1.53
26.00	0.20	0.86	0.23*	1.24	0.00	1.24
27.00	0.19	0.87	0.22*	0.93	0.00	0.93
28.00	0.20	0.87	0.23*	0.62	0.00	0.62
29.00	0.20	0.88	0.23*	0.32	0.00	0.32
30.00	0.20	0.88	0.23*	0.02	0.00	0.02
31.00	2.22	0.88	2.52	0.00	0.00	0.00
32.00	2.22	0.88	2.52	0.00	0.00	0.00
33.00	2.21	0.88	2.53	0.00	0.00	0.00
34.00	2.20	0.87	2.53	0.00	0.00	0.00
35.00	2.20	0.87	2.53	0.00	0.00	0.00
36.00	2.00	0.87	5.00	0.00	0.00	0.00
37.00	2.00	0.86	5.00	0.00	0.00	0.00
38.00	2.00	0.86	5.00	0.00	0.00	0.00
39.00	2.00	0.85	5.00	0.00	0.00	0.00
40.00	2.00	0.85	5.00	0.00	0.00	0.00
41.00	2.00	0.84	5.00	0.00	0.00	0.00
42.00	2.00	0.84	5.00	0.00	0.00	0.00
43.00	2.00	0.83	5.00	0.00	0.00	0.00
44.00	2.00	0.83	5.00	0.00	0.00	0.00
45.00	2.00	0.82	5.00	0.00	0.00	0.00
46.00	2.00	0.82	5.00	0.00	0.00	0.00
47.00	2.00	0.81	5.00	0.00	0.00	0.00
48.00	2.00	0.80	5.00	0.00	0.00	0.00
49.00	2.00	0.80	5.00	0.00	0.00	0.00
50.00	2.00	0.79	5.00	0.00	0.00	0.00

* F.S.<1, Liquefaction Potential Zone
(F.S. is limited to 5, CRR is limited to 2, CSR is limited to 2)

Units: Unit: qc, fs, Stress or Pressure = atm (1.0581tsf); Unit Weight = pcf; Depth = ft; Settlement = in.

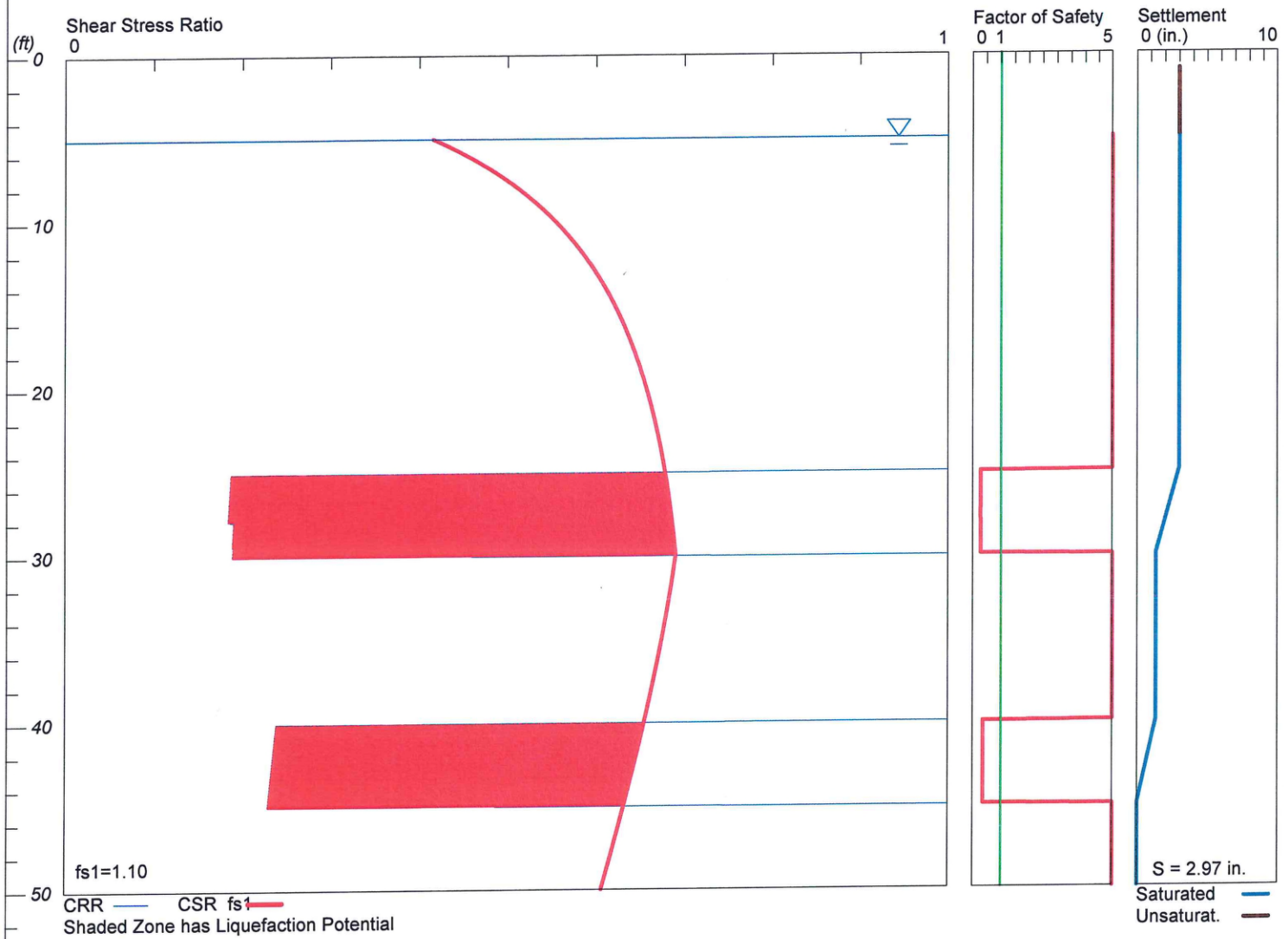
1 atm (atmosphere) = 1 tsf (ton/ft2)
CRRm Cyclic resistance ratio from soils
CSRsf Cyclic stress ratio induced by a given earthquake (with user request factor of safety)
F.S. Factor of Safety against liquefaction, F.S.=CRRm/CSRsf
S_sat Settlement from saturated sands
S_dry Settlement from Unsaturated Sands
S_all Total Settlement from Saturated and Unsaturated Sands
NoLiq No-Liquefy Soils

LIQUEFACTION ANALYSIS

PS LA Jefferson Blvd, Playa Vista,

Hole No.=B4 ***Water Depth=5 ft***

Magnitude=7.1
Acceleration=0.588g



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LIQUEFACTION ANALYSIS SUMMARY

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Input File Name: P:\John Maier\Public Storage\Geo\LA 3 - Playa Vista\B-4 1-23-20 10 in 50.liq
Title: PS LA Jefferson Blvd, Playa Vista,
Subtitle:

Surface Elev.=
Hole No.=B4
Depth of Hole= 50.00 ft
Water Table during Earthquake= 5.00 ft
Water Table during In-Situ Testing= 25.00 ft
Max. Acceleration= 0.59 g
Earthquake Magnitude= 7.10

Input Data:
Surface Elev.=
Hole No.=B4
Depth of Hole=50.00 ft
Water Table during Earthquake= 5.00 ft
Water Table during In-Situ Testing= 25.00 ft
Max. Acceleration=0.59 g
Earthquake Magnitude=7.10
No-Liquefiable Soils: CL, OL are Non-Liq. Soil

1. SPT or BPT Calculation.
2. Settlement Analysis Method: Ishihara / Yoshimine
3. Fines Correction for Liquefaction: Idriss/Seed
4. Fine Correction for Settlement: During Liquefaction*
5. Settlement Calculation in: All zones*
6. Hammer Energy Ratio, Ce = 1.25
7. Borehole Diameter, Cb= 1
8. Sampling Method, Cs= 1.2
9. User request factor of safety (apply to CSR) , User= 1.1
   Plot one CSR curve (fs1=User)
10. Use Curve Smoothing: No
* Recommended Options

In-Situ Test Data:

Depth ft	SPT	gamma pcf	Fines %
1.00	14.00	120.00	NoLiq
3.50	7.00	120.00	NoLiq
6.00	6.00	120.00	NoLiq
10.00	10.00	120.00	NoLiq
15.00	5.00	120.00	NoLiq
20.00	6.00	120.00	NoLiq
25.00	7.00	120.00	54.00
30.00	3.00	120.00	NoLiq
35.00	4.00	120.00	NoLiq
40.00	11.00	120.00	75.00
45.00	6.00	120.00	NoLiq

Output Results:

Settlement of Saturated Sands=2.97 in.
Settlement of Unsaturated Sands=0.00 in.
Total Settlement of Saturated and Unsaturated Sands=2.97 in.
Differential Settlement=1.486 to 1.961 in.

Depth ft	CRRm	CSRfs	F.S.	S_sat. in.	S_dry in.	S_all in.
1.00	2.00	0.42	5.00	2.97	0.00	2.97
2.00	2.00	0.42	5.00	2.97	0.00	2.97
3.00	2.00	0.42	5.00	2.97	0.00	2.97
4.00	2.00	0.42	5.00	2.97	0.00	2.97
5.00	2.00	0.42	5.00	2.97	0.00	2.97
6.00	2.00	0.45	5.00	2.97	0.00	2.97
7.00	2.00	0.49	5.00	2.97	0.00	2.97
8.00	2.00	0.51	5.00	2.97	0.00	2.97
9.00	2.00	0.54	5.00	2.97	0.00	2.97
10.00	2.00	0.55	5.00	2.97	0.00	2.97
11.00	2.00	0.57	5.00	2.97	0.00	2.97
12.00	2.00	0.59	5.00	2.97	0.00	2.97
13.00	2.00	0.60	5.00	2.97	0.00	2.97
14.00	2.00	0.61	5.00	2.97	0.00	2.97
15.00	2.00	0.62	5.00	2.97	0.00	2.97
16.00	2.00	0.63	5.00	2.97	0.00	2.97
17.00	2.00	0.64	5.00	2.97	0.00	2.97
18.00	2.00	0.65	5.00	2.97	0.00	2.97
19.00	2.00	0.65	5.00	2.97	0.00	2.97
20.00	2.00	0.66	5.00	2.97	0.00	2.97
21.00	2.00	0.66	5.00	2.97	0.00	2.97
22.00	2.00	0.67	5.00	2.97	0.00	2.97
23.00	2.00	0.67	5.00	2.97	0.00	2.97
24.00	2.00	0.67	5.00	2.97	0.00	2.97
25.00	2.00	0.68	5.00	2.97	0.00	2.97
26.00	0.19	0.68	0.27*	2.66	0.00	2.66
27.00	0.18	0.68	0.27*	2.33	0.00	2.33
28.00	0.19	0.69	0.28*	2.00	0.00	2.00
29.00	0.19	0.69	0.27*	1.68	0.00	1.68
30.00	0.19	0.69	0.27*	1.35	0.00	1.35
31.00	2.00	0.69	5.00	1.34	0.00	1.34
32.00	2.00	0.68	5.00	1.34	0.00	1.34
33.00	2.00	0.68	5.00	1.34	0.00	1.34
34.00	2.00	0.68	5.00	1.34	0.00	1.34
35.00	2.00	0.67	5.00	1.34	0.00	1.34
36.00	2.00	0.67	5.00	1.34	0.00	1.34
37.00	2.00	0.67	5.00	1.34	0.00	1.34
38.00	2.00	0.66	5.00	1.34	0.00	1.34
39.00	2.00	0.66	5.00	1.34	0.00	1.34
40.00	2.00	0.65	5.00	1.34	0.00	1.34
41.00	0.24	0.65	0.36*	1.09	0.00	1.09
42.00	0.23	0.65	0.36*	0.82	0.00	0.82
43.00	0.23	0.64	0.36*	0.55	0.00	0.55
44.00	0.23	0.64	0.36*	0.28	0.00	0.28
45.00	0.23	0.63	0.36*	0.01	0.00	0.01
46.00	2.00	0.63	5.00	0.00	0.00	0.00
47.00	2.00	0.62	5.00	0.00	0.00	0.00
48.00	2.00	0.62	5.00	0.00	0.00	0.00
49.00	2.00	0.61	5.00	0.00	0.00	0.00
50.00	2.00	0.61	5.00	0.00	0.00	0.00

* F.S.<1, Liquefaction Potential Zone
(F.S. is limited to 5, CRR is limited to 2, CSR is limited to 2)

Units: Unit: qc, fs, Stress or Pressure = atm (1.0581tsf); Unit Weight = pcf; Depth = ft; Settlement = in.

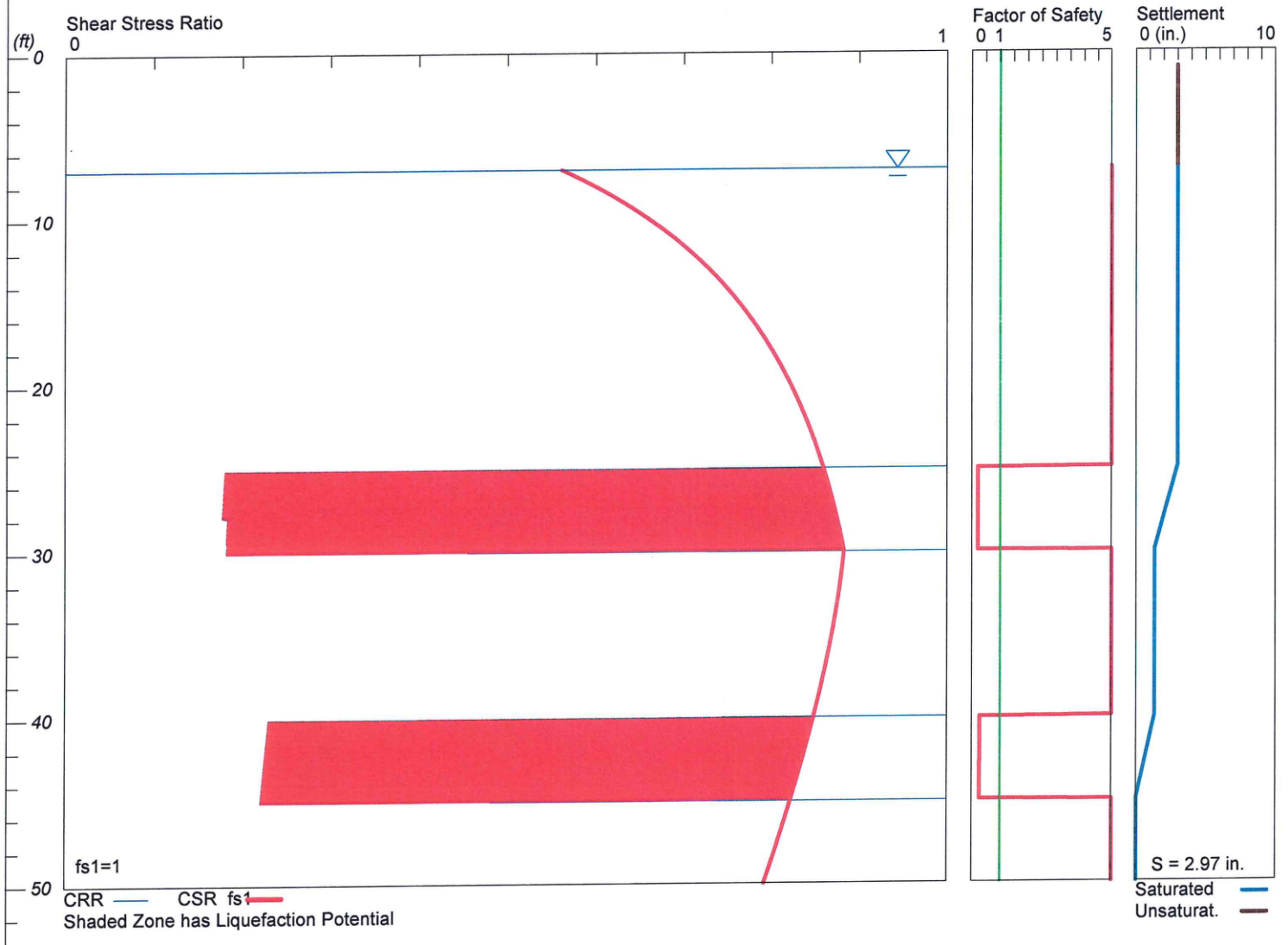
1 atm (atmosphere) = 1 tsf (ton/ft2)
CRRm Cyclic resistance ratio from soils
CSRsf Cyclic stress ratio induced by a given earthquake (with user request factor of safety)
F.S. Factor of Safety against liquefaction, F.S.=CRRm/CSRsf
S_sat Settlement from saturated sands
S_dry Settlement from Unsaturated Sands
S_all Total Settlement from Saturated and Unsaturated Sands
NoLiq No-Liquefy Soils

LIQUEFACTION ANALYSIS

PS LA Jefferson Blvd, Playa Vista,

Hole No.=B4 Water Depth=7 ft

Magnitude=7.2
Acceleration=0.878g



LiquefyPro CivilTech Software USA www.civiltech.com

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LIQUEFACTION ANALYSIS SUMMARY

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Input File Name: P:\John Maier\Public Storage\Geo\LA 3 - Playa Vista\B-4 1-23-20 2 in 50.liq
Title: PS LA Jefferson Blvd, Playa Vista,
Subtitle:

Surface Elev.=
Hole No.=B4
Depth of Hole= 50.00 ft
Water Table during Earthquake= 7.00 ft
Water Table during In-Situ Testing= 25.00 ft
Max. Acceleration= 0.88 g
Earthquake Magnitude= 7.20

Input Data:
Surface Elev.=
Hole No.=B4
Depth of Hole=50.00 ft
Water Table during Earthquake= 7.00 ft
Water Table during In-Situ Testing= 25.00 ft
Max. Acceleration=0.88 g
Earthquake Magnitude=7.20
No-Liquefiable Soils: CL, OL are Non-Liq. Soil

1. SPT or BPT Calculation.
2. Settlement Analysis Method: Ishihara / Yoshimine
3. Fines Correction for Liquefaction: Idriss/Seed
4. Fine Correction for Settlement: During Liquefaction*
5. Settlement Calculation in: All zones*
6. Hammer Energy Ratio, Ce = 1.25
7. Borehole Diameter, Cb= 1
8. Sampling Method, Cs= 1.2
9. User request factor of safety (apply to CSR) , User= 1.0
   Plot one CSR curve (fs1=1)
10. Use Curve Smoothing: No
* Recommended Options

In-Situ Test Data:

Depth ft	SPT	gamma pcf	Fines %
1.00	14.00	120.00	NoLiq
3.50	7.00	120.00	NoLiq
6.00	6.00	120.00	NoLiq
10.00	10.00	120.00	NoLiq
15.00	5.00	120.00	NoLiq
20.00	6.00	120.00	NoLiq
25.00	7.00	120.00	54.00
30.00	3.00	120.00	NoLiq
35.00	4.00	120.00	NoLiq
40.00	11.00	120.00	75.00
45.00	6.00	120.00	NoLiq

Output Results:

Settlement of Saturated Sands=2.97 in.
Settlement of Unsaturated Sands=0.00 in.
Total Settlement of Saturated and Unsaturated Sands=2.97 in.
Differential Settlement=1.486 to 1.961 in.

Depth ft	CRRm	CSRfs	F.S.	S_sat. in.	S_dry in.	S_all in.
1.00	2.00	0.57	5.00	2.97	0.00	2.97
2.00	2.00	0.57	5.00	2.97	0.00	2.97
3.00	2.00	0.57	5.00	2.97	0.00	2.97
4.00	2.00	0.57	5.00	2.97	0.00	2.97
5.00	2.00	0.56	5.00	2.97	0.00	2.97
6.00	2.00	0.56	5.00	2.97	0.00	2.97
7.00	2.00	0.56	5.00	2.97	0.00	2.97
8.00	2.00	0.60	5.00	2.97	0.00	2.97
9.00	2.00	0.63	5.00	2.97	0.00	2.97
10.00	2.00	0.66	5.00	2.97	0.00	2.97
11.00	2.00	0.69	5.00	2.97	0.00	2.97
12.00	2.00	0.71	5.00	2.97	0.00	2.97
13.00	2.00	0.73	5.00	2.97	0.00	2.97
14.00	2.00	0.75	5.00	2.97	0.00	2.97
15.00	2.00	0.76	5.00	2.97	0.00	2.97
16.00	2.00	0.78	5.00	2.97	0.00	2.97
17.00	2.00	0.79	5.00	2.97	0.00	2.97
18.00	2.00	0.80	5.00	2.97	0.00	2.97
19.00	2.00	0.81	5.00	2.97	0.00	2.97
20.00	2.00	0.82	5.00	2.97	0.00	2.97
21.00	2.00	0.83	5.00	2.97	0.00	2.97
22.00	2.00	0.84	5.00	2.97	0.00	2.97
23.00	2.00	0.85	5.00	2.97	0.00	2.97
24.00	2.00	0.85	5.00	2.97	0.00	2.97
25.00	2.00	0.86	5.00	2.97	0.00	2.97
26.00	0.18	0.86	0.21*	2.66	0.00	2.66
27.00	0.18	0.87	0.21*	2.33	0.00	2.33
28.00	0.18	0.87	0.21*	2.00	0.00	2.00
29.00	0.18	0.88	0.21*	1.68	0.00	1.68
30.00	0.18	0.88	0.21*	1.35	0.00	1.35
31.00	2.00	0.88	5.00	1.34	0.00	1.34
32.00	2.00	0.88	5.00	1.34	0.00	1.34
33.00	2.00	0.88	5.00	1.34	0.00	1.34
34.00	2.00	0.87	5.00	1.34	0.00	1.34
35.00	2.00	0.87	5.00	1.34	0.00	1.34
36.00	2.00	0.87	5.00	1.34	0.00	1.34
37.00	2.00	0.86	5.00	1.34	0.00	1.34
38.00	2.00	0.86	5.00	1.34	0.00	1.34
39.00	2.00	0.85	5.00	1.34	0.00	1.34
40.00	2.00	0.85	5.00	1.34	0.00	1.34
41.00	0.23	0.84	0.27*	1.09	0.00	1.09
42.00	0.23	0.84	0.27*	0.82	0.00	0.82
43.00	0.22	0.83	0.27*	0.55	0.00	0.55
44.00	0.22	0.83	0.27*	0.28	0.00	0.28
45.00	0.22	0.82	0.27*	0.01	0.00	0.01
46.00	2.00	0.82	5.00	0.00	0.00	0.00
47.00	2.00	0.81	5.00	0.00	0.00	0.00
48.00	2.00	0.80	5.00	0.00	0.00	0.00
49.00	2.00	0.80	5.00	0.00	0.00	0.00
50.00	2.00	0.79	5.00	0.00	0.00	0.00

* F.S.<1, Liquefaction Potential Zone
(F.S. is limited to 5, CRR is limited to 2, CSR is limited to 2)

Units: Unit: qc, fs, Stress or Pressure = atm (1.0581tsf); Unit Weight = pcf; Depth = ft; Settlement = in.

1 atm (atmosphere) = 1 tsf (ton/ft2)
CRRm Cyclic resistance ratio from soils
CSRsf Cyclic stress ratio induced by a given earthquake (with user request factor of safety)
F.S. Factor of Safety against liquefaction, F.S.=CRRm/CSRsf
S_sat Settlement from saturated sands
S_dry Settlement from Unsaturated Sands
S_all Total Settlement from Saturated and Unsaturated Sands
NoLiq No-Liquefy Soils

APPENDIX B

FIELD PROCEDURES

The field operations were conducted in general accordance with the procedures recommended by the American Society for Testing and Materials (ASTM) designation D

420 entitled “Standard Guide for Sampling Rock and Rock” and/or other relevant specifications. Soil samples were preserved and transported to *Giles'* laboratory in general accordance with the procedures recommended by ASTM designation D 4220 entitled “Standard Practice for Preserving and Transporting Soil Samples.” Brief descriptions of the sampling, testing and field procedures commonly performed by *Giles* are provided herein.

GENERAL FIELD PROCEDURES

Test Boring Elevations

The ground surface elevations reported on the Test Boring Logs are referenced to the assumed benchmark shown on the Boring Location Plan (Figure 1). Unless otherwise noted, the elevations were determined with a conventional hand-level and are accurate to within about 1 foot.

Test Boring Locations

The test borings were located on-site based on the existing site features and/or apparent property lines. Dimensions illustrating the approximate boring locations are reported on the Boring Location Plan (Figure 1).

Water Level Measurement

The water levels reported on the Test Boring Logs represent the depth of "free" water encountered during drilling and/or after the drilling tools were removed from the borehole. Water levels measured within a granular (sand and gravel) soil profile are typically indicative of the water table elevation. It is usually not possible to accurately identify the water table elevation with cohesive (clayey) soils, since the rate of seepage is slow. The water table elevation within cohesive soils must therefore be determined over a period of time with groundwater observation wells.

It must be recognized that the water table may fluctuate seasonally and during periods of heavy precipitation. Depending on the subsurface conditions, water may also become perched above the water table, especially during wet periods.

Borehole Backfilling Procedures

Each borehole was backfilled upon completion of the field operations. If potential contamination was encountered, and/or if required by state or local regulations, boreholes were backfilled with an "impervious" material (such as bentonite slurry). Borings that penetrated pavements, sidewalks, etc. were "capped" with Portland Cement concrete, asphaltic concrete, or a similar surface material. It must, however, be recognized that the backfill material may settle, and the surface cap may subside, over a period of time. Further backfilling and/or re-surfacing by *Giles'* client or the property owner may be required.

FIELD SAMPLING AND TESTING PROCEDURES

Auger Sampling (AU)

Soil samples are removed from the auger flights as an auger is withdrawn above the ground surface. Such samples are used to determine general soil types and identify approximate soil stratifications. Auger samples are highly disturbed and are therefore not typically used for geotechnical strength testing.

Split-Barrel Sampling (SS) – (ASTM D-1586)

A split-barrel sampler with a 2-inch outside diameter is driven into the subsoil with a 140-pound hammer free-falling a vertical distance of 30 inches. The summation of hammer-blows required to drive the sampler the final 12-inches of an 18-inch sample interval is defined as the "Standard Penetration Resistance" or N-value is an index of the relative density of granular soils and the comparative consistency of cohesive soils. A soil sample is collected from each SPT interval.

Shelby Tube Sampling (ST) – (ASTM D-1587)

A relatively undisturbed soil sample is collected by hydraulically advancing a thin-walled Shelby Tube sampler into a soil mass. Shelby Tubes have a sharp cutting edge and are commonly 2 to 5 inches in diameter.

Bulk Sample (BS)

A relatively large volume of soils is collected with a shovel or other manually-operated tool. The sample is typically transported to *Giles'* materials laboratory in a sealed bag or bucket.

Dynamic Cone Penetration Test (DC) – (ASTM STP 399)

This test is conducted by driving a 1.5-inch-diameter cone into the subsoil using a 15-pound steel ring (hammer), free-falling a vertical distance of 20 inches. The number of hammer-blows required to drive the cone 1¾ inches is an indication of the soil strength and density, and is defined as "N". The Dynamic Cone Penetration test is commonly conducted in hand auger borings, test pits and within excavated trenches.

- Continued -

Ring-Lined Barrel Sampling – (ASTM D 3550)

In this procedure, a ring-lined barrel sampler is used to collect soil samples for classification and laboratory testing. This method provides samples that fit directly into laboratory test instruments without additional handling/disturbance.

Sampling and Testing Procedures

The field testing and sampling operations were conducted in general accordance with the procedures recommended by the American Society for Testing and Materials (ASTM) and/or other relevant specifications. Results of the field testing (i.e. N-values) are reported on the Test Boring Logs. Explanations of the terms and symbols shown on the logs are provided on the appendix enclosure entitled “General Notes”.

APPENDIX C

LABORATORY TESTING AND CLASSIFICATION

The laboratory testing was conducted under the supervision of a geotechnical engineer in accordance with the procedures recommended by the American Society for Testing and Materials (ASTM) and/or other relevant specifications. Brief descriptions of laboratory tests commonly performed by *Giles* are provided herein.

LABORATORY TESTING AND CLASSIFICATION

Photoionization Detector (PID)

In this procedure, soil samples are "scanned" in *Giles'* analytical laboratory using a Photoionization Detector (PID). The instrument is equipped with an 11.7 eV lamp calibrated to a Benzene Standard and is capable of detecting a minute concentration of **certain** Volatile Organic Compound (VOC) vapors, such as those commonly associated with petroleum products and some solvents. Results of the PID analysis are expressed in HNu (manufacturer's) units rather than actual concentration.

Moisture Content (w) (ASTM D 2216)

Moisture content is defined as the ratio of the weight of water contained within a soil sample to the weight of the dry solids within the sample. Moisture content is expressed as a percentage.

Unconfined Compressive Strength (qu) (ASTM D 2166)

An axial load is applied at a uniform rate to a cylindrical soil sample. The unconfined compressive strength is the maximum stress obtained or the stress when 15% axial strain is reached, whichever occurs first.

Calibrated Penetrometer Resistance (qp)

The small, cylindrical tip of a hand-held penetrometer is pressed into a soil sample to a prescribed depth to measure the soils capacity to resist penetration. This test is used to evaluate unconfined compressive strength.

Vane-Shear Strength (qs)

The blades of a vane are inserted into the flat surface of a soil sample and the vane is rotated until failure occurs. The maximum shear resistance measured immediately prior to failure is taken as the vane-shear strength.

Loss-on-Ignition (ASTM D 2974; Method C)

The Loss-on-Ignition (L.O.I.) test is used to determine the organic content of a soil sample. The procedure is conducted by heating a dry soil sample to 440°C in order to burn-off or "ash" organic matter present within the sample. The L.O.I. value is the ratio of the weight loss due to ignition compared to the initial weight of the dry sample. L.O.I. is expressed as a percentage.

Particle Size Distribution (ASTB D 421, D 422, and D 1140)

This test is performed to determine the distribution of specific particle sizes (diameters) within a soil sample. The distribution of coarse-grained soil particles (sand and gravel) is determined from a "sieve analysis," which is conducted by passing the sample through a series of nested sieves. The distribution of fine-grained soil particles (silt and clay) is determined from a "hydrometer analysis" which is based on the sedimentation of particles suspended in water.

Consolidation Test (ASTM D 2435)

In this procedure, a series of cumulative vertical loads are applied to a small, laterally confined soil sample. During each load increment, vertical compression (consolidation) of the sample is measured over a period of time. Results of this test are used to estimate settlement and time rate of settlement.

Classification of Samples

Each soil sample was visually-manually classified, based on texture and plasticity, in general accordance with the Unified Soil Classification System (ASTM D-2488-75). The classifications are reported on the Test Boring Logs.

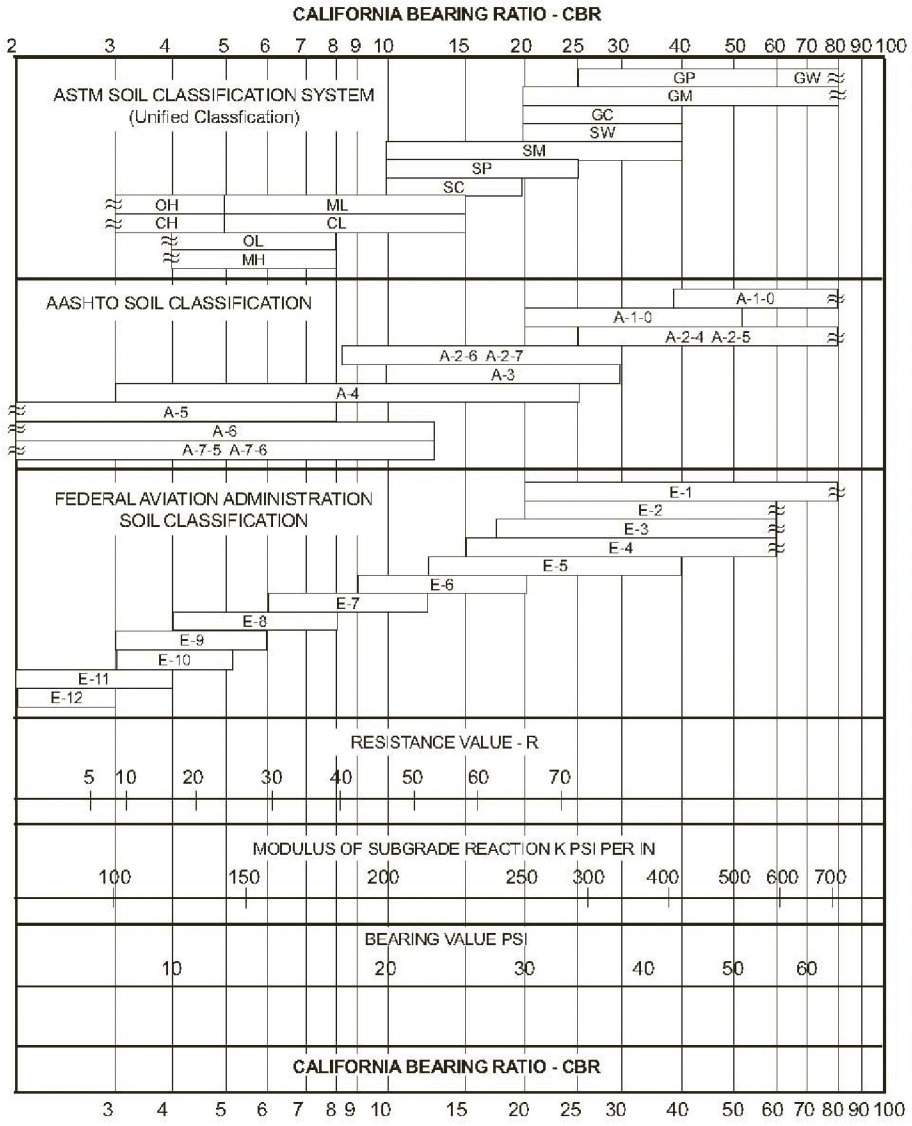
Laboratory Testing

The laboratory testing operations were conducted in general accordance with the procedures recommended by the American Society for Testing and Materials (ASTM) and/or other relevant specifications. Results of the laboratory tests are provided on the Test Boring Logs or other appendix enclosures. Explanation of the terms and symbols used on the logs is provided on the appendix enclosure entitled "General Notes."

California Bearing Ratio (CBR) Test ASTM D-1833

The CBR test is used for evaluation of a soil subgrade for pavement design. The test consists of measuring the force required for a 3-square-inch cylindrical piston to penetrate 0.1 or 0.2 inch into a compacted soil sample. The result is expressed as a percent of force required to penetrate a standard compacted crushed stone.

Unless a CBR test has been specifically requested by the client, the CBR is estimated from published charts, based on soil classification and strength characteristics. A typical correlation chart is below.



APPENDIX D

GENERAL INFORMATION

GUIDE SPECIFICATIONS FOR SUBGRADE AND PREPARATION FOR FILL, FOUNDATION, FLOOR SLAB AND PAVEMENT SUPPORT; AND SELECTION, PLACEMENT AND COMPACTION OF FILL SOILS USING MODIFIED PROCTOR PROCEDURES

1. Construction monitoring and testing of subgrades and grades for fill, foundation, floor slab and pavement; and fill selection, placement and compaction shall be performed by an experienced soils engineer and/or his representatives.

2. All compacted fill, subgrades, and grades shall be (a) underlain by suitable bearing material, (b) free of all organic frozen, or other deleterious material, and (c) observed, tested and approved by qualified engineering personnel representing an experienced soils engineer. Preparation of subgrades after stripping vegetation, organic or other unsuitable materials shall consist of (a) proofrolling to detect soft, wet, yielding soils or other unstable materials that must be undercut, (b) scarifying top 6 to 8 inches, (c) moisture conditioning the soils as required, and (d) recompaction to same minimum in-situ density required for similar material indicated under Item 5. Note: Compaction requirements for pavement subgrade are higher than other areas. Weather and construction equipment may damage compacted fill surface and reworking and retesting may be necessary for proper performance.

3. In overexcavation and fill areas, the compacted fill must extend (a) a minimum 1 foot lateral distance beyond the exterior edge of the foundation at bearing grade or pavement at subgrade and down to compacted fill subgrade on a maximum 0.5(H):1(v) slope, (b) 1 foot above footing grade outside the building, and (c) to floor subgrade inside the building. Fill shall be placed and compacted on a 5(H):1(V) slope or must be stepped or benched as required to flatten if not specifically approved by qualified personnel under the direction of an experienced soils engineer.

4. The compacted fill materials shall be free of deleterious, organic, or frozen matter, shall contain no chemicals that may result in the material being classified as "contaminated", and shall be low-expansive with a maximum Liquid Limit (ASTM D-423) and Plasticity Index (ASTM D-424) of 30 and 15, respectively, unless specifically tested and found to have low expansive properties and approved by an experienced soils engineer. The top 12 inches of compacted fill should have a maximum 3 inch particle diameter and all underlying compacted fill a maximum 6 inch diameter unless specifically approved by an experienced soils engineer. All fill material must be tested and approved under the direction of an experienced soils engineer prior to placement. If the fill is to provide non-frost susceptible characteristics, it must be classified as a clean GW, GP, SW or SP per Unified Soils Classification System (ASTM D-2487).

5. For structural fill depths less than 20 feet, the density of the structural compacted fill and scarified subgrade and grades shall not be less than 90 percent of the maximum dry density as determined by Modified Proctor (ASTM D-1557) with the exception of the top 12 inches of pavement subgrade which shall have a minimum in-situ density of 95 percent of maximum dry density, or 5 percent higher than underlying structural fill materials. Where the structural fill depth is greater than 20 feet, the portion below 20 feet should have a minimum in-place density of 95 percent of its maximum dry density or 5 percent higher than the top 20 feet. Cohesive soils shall not vary by more than -1 to +3 percent moisture content and granular soil ±3 percent from the optimum when placed and compacted or recompacted, unless specifically recommended/approved by the soils engineer observing the placement and compaction. Cohesive soils with moderate to high expansion potentials (PI>15) should, however, be placed, compacted and maintained prior to construction at a 3±1 percent moisture content above optimum moisture content to limit future heave. Fill shall be placed in layers with a maximum loose thickness of 8 inches for foundations and 10 inches for floor slabs and pavements, unless specifically approved by the soils engineer taking into consideration the type of materials and compaction equipment being used. The compaction equipment should consist of suitable mechanical equipment specifically designed for soil compaction. Bulldozers or similar tracked vehicles are typically not suitable for compaction.

6. Excavation, filing, subgrade grade preparation shall be performed in a manner and sequence that will provide drainage at all times and proper control of erosion. Precipitation, springs, and seepage water encountered shall be pumped or drained to provide a suitable working platform. Springs or water seepage encountered during grade/foundation construction must be called to the soils engineer's attention immediately for possible construction procedure revision or inclusion of an underdrain system.

7. Non-structural fill adjacent to structural fill should typically be placed in unison to provide lateral support. Backfill along walls must be placed and compacted with care to ensure excessive unbalanced lateral pressures do not develop. The type of fill material placed adjacent to below grade walls (i.e. basement walls and retaining walls) must be properly tested and approved by an experienced soils engineer with consideration for the lateral pressure used in the wall design.

8. Wherever, in the opinion of the soils engineer or the Owner's Representatives, an unstable condition is being created either by cutting or filling, the work should not proceed into that area until an appropriate geotechnical exploration and analysis has been performed and the grading plan revised, if found necessary.

GENERAL COMMENTS

The soil samples obtained during the subsurface exploration will be retained for a period of thirty days. If no instructions are received, they will be disposed of at that time.

This report has been prepared exclusively for the client in order to aid in the evaluation of this property and to assist the architects and engineers in the design and preparation of the project plans and specifications. Copies of this report may be provided to contractor(s), with contract documents, to disclose information relative to this project. The report, however, has not been prepared to serve as the plans and specifications for actual construction without the appropriate interpretation by the project architect, structural engineer, and/or civil engineer. Reproduction and distribution of this report must be authorized by the client and *Giles*.

This report has been based on assumed conditions/characteristics of the proposed development where specific information was not available. It is recommended that the architect, civil engineer and structural engineer along with any other design professionals involved in this project carefully review these assumptions to ensure they are consistent with the actual planned development. When discrepancies exist, they should be brought to our attention to ensure they do not affect the conclusions and recommendations provided herein. The project plans and specifications may also be submitted to *Giles* for review to ensure that the geotechnical related conclusions and recommendations provided herein have been correctly interpreted.

The analysis of this site was based on a subsoil profile interpolated from a limited subsurface exploration. If the actual conditions encountered during construction vary from those indicated by the borings, *Giles* must be contacted immediately to determine if the conditions alter the recommendations contained herein.

The conclusions and recommendations presented in this report have been promulgated in accordance with generally accepted professional engineering practices in the field of geotechnical engineering. No other warranty is either expressed or implied.

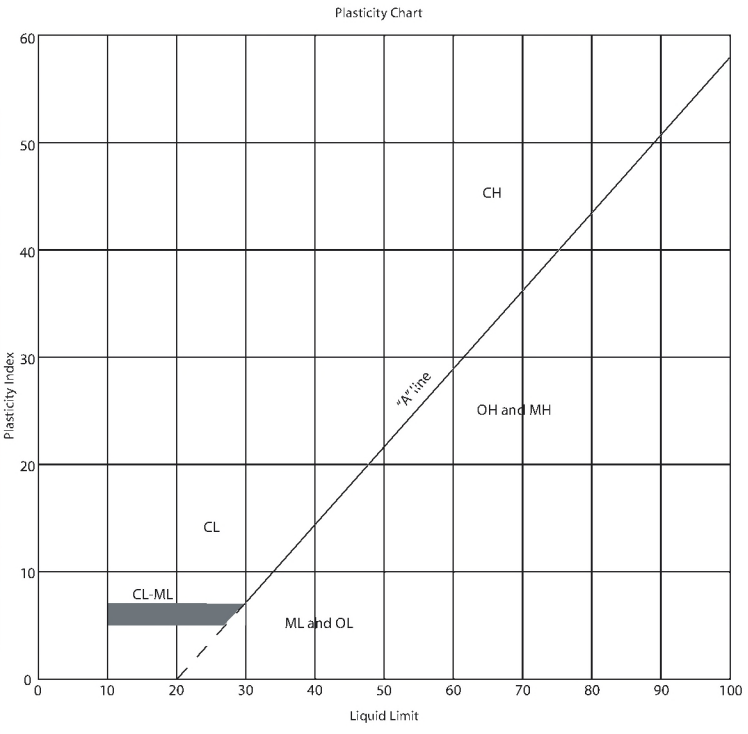
CHARACTERISTICS AND RATINGS OF UNIFIED SOIL SYSTEM CLASSES FOR SOIL CONSTRUCTION *									
Class	**Compaction Characteristics**	**Max. Dry Density Standard Proctor (pcf)**	**Compressibility and Expansion**	**Drainage and Permeability**	**Value as an Embankment Material**	**Value as Subgrade When Not Subject to Frost**	**Value as Base Course**	**Value as Temporary Pavement**	
								With Dust Palliative	**With Bituminous Treatment**
GW	Good: tractor, rubber-tired, steel wheel or vibratory roller	125-135	Almost none	Good drainage, pervious	Very stable	Excellent	Good	Fair to poor	Excellent
GP	Good: tractor, rubber-tired, steel wheel or vibratory roller	115-125	Almost none	Good drainage, pervious	Reasonably stable	Excellent to good	Poor to fair	Poor	
GM	Good: rubber-tired or light sheepsfoot roller	120-135	Slight	Poor drainage, semipervious	Reasonably stable	Excellent to good	Fair to poor	Poor	Poor to fair
GC	Good to fair: rubber-tired or sheepsfoot roller	115-130	Slight	Poor drainage, impervious	Reasonably stable	Good	Good to fair **	Excellent	Excellent
SW	Good: tractor, rubber-tired or vibratory roller	110-130	Almost none	Good drainage, pervious	Very stable	Good	Fair to poor	Fair to poor	Good
SP	Good: tractor, rubber-tired or vibratory roller	100-120	Almost none	Good drainage, pervious	Reasonably stable when dense	Good to fair	Poor	Poor	Poor to fair
SM	Good: rubber-tired or sheepsfoot roller	110-125	Slight	Poor drainage, impervious	Reasonably stable when dense	Good to fair	Poor	Poor	Poor to fair
SC	Good to fair: rubber-tired or sheepsfoot roller	105-125	Slight to medium	Poor drainage, impervious	Reasonably stable	Good to fair	Fair to poor	Excellent	Excellent
ML	Good to poor: rubber-tired or sheepsfoot roller	95-120	Slight to medium	Poor drainage, impervious	Poor stability, high density required	Fair to poor	Not suitable	Poor	Poor
CL	Good to fair: sheepsfoot or rubber-tired roller	95-120	Medium	No drainage, impervious	Good stability	Fair to poor	Not suitable	Poor	Poor
OL	Fair to poor: sheepsfoot or rubber-tired roller	80-100	Medium to high	Poor drainage, impervious	Unstable, should not be used	Poor	Not suitable	Not suitable	Not suitable
MH	Fair to poor: sheepsfoot or rubber-tired roller	70-95	High	Poor drainage, impervious	Poor stability, should not be used	Poor	Not suitable	Very poor	Not suitable
CH	Fair to poor: sheepsfoot roller	80-105	Very high	No drainage, impervious	Fair stability, may soften on expansion	Poor to very poor	Not suitable	Very poor	Not suitable
OH	Fair to poor: sheepsfoot roller	65-100	High	No drainage, impervious	Unstable, should not be used	Very poor	Not suitable	Not suitable	Not suitable
Pt	Not suitable		Very high	Fair to poor drainage	Should not be used	Not suitable	Not suitable	Not suitable	Not suitable

* "The Unified Classification: Appendix A - Characteristics of Soil, Groups Pertaining to Roads and Airfields, and Appendix B - Characteristics of Soil Groups Pertaining to Embankments and Foundations," Technical Memorandum 357, U.S. Waterways Ixperiment Station, Vicksburg, 1953.

** Not suitable if subject to frost.

UNIFIED SOIL CLASSIFICATION SYSTEM (ASTM D-2487)

Major Divisions			Group Symbols	Typical Names	Laboratory Classification Criteria	
Coarse-grained soils (more than half of material is larger than No. 200 sieve size)	Gravels (More than half of coarse fraction is larger than No. 4 sieve size)	Clean gravels (little or no fines)	GW	Well-graded gravels, gravel-sand mixtures, little or no fines	Determine percentages of sand and gravel from grain-size curve. Depending on percentage of fines (fraction smaller than No. 200 sieve size), coarse-grained soils are classified as follows: Less than 5 percent: GW, GP, SW, SP. More than 12 percent: GM, GC, SM, SC. 5 to 12 percent: *Borderline* cases requiring dual symbols[b]	$C_u = \frac{D_{60}}{D_{10}}$ greater than 4; $C_c = \frac{(D_{30})^2}{D_{10} \times D_{60}}$ between 1 and 3
			GP	Poorly graded gravels, gravel-sand mixtrues, little or no fines		Not meeting all gradation requirements for GW
		Gravels with fines (appreciable amount of fines)	GM[a] d	Silty gravels, gravel-sand-silt mixtures	Atterberg limits below "A" line or P.I. less than 4	Limits plotting within shaded area, above "A" line with P.I. between 4 and 7 are *borderline* cases requiring use of dual symbols
			GM[a] u			
			GC	Clayey gravels, gravel-sand-clay mixtures	Atterberg limits above "A" line or P.I. greater than 7	
	Sands (More than half of coarse fraction is smaller than No. 4 sieve size)	Clean sands (Little or no fines)	SW	Well-graded sands, gravelly sands, little or no fines	$C_u = \frac{D_{60}}{D_{10}}$ greater than 4; $C_c = \frac{(D_{30})^2}{D_{10} \times D_{60}}$ between 1 and 3	
			SP	Poorly graded sands, gravelly sands, little or no fines		Not meeting all gradation requirements for SW
		Sands with fines (Appreciable amount of fines)	SM[a] d	Silty sands, sand-silt mixtures	Atterberg limits below "A" line or P.I. less than 4	Limits plotting within shaded area, above "A" line with P.I. between 4 and 7 are *borderline* cases requiring use of dual symbols
			SM[a] u			
			SC	Clayey sands, sand-clay mixtures	Atterberg limits above "A" line or P.I. greater than 7	
Fine-grained soils (More than half material is smaller than No. 200 sieve size)	Silts and clays (Liquid limit less than 50)		ML	Inorganic silts and very fine sands, rock flour, silty or clayey fine sands, or clayey silts with slight plasticity	Plasticity Chart	
			CL	Inorganic clays of low to medium plasticity, gravelly clays, sandy clays, silty clays		
			OL	Organic silts and organic silty clays of low plasticity		
	Silts and clays (Liquid limit greater than 50)		MH	Inorganic silts, micaceous or diatomaceous fine sandy or silty soils, elastic silts		
			CH	Inorganic clays of high plasticity, fat clays		
			OH	Organic clays of medium to high plasticity, organic silts		
	Highly organic soils		Pt	Peat and other highly organic soils		



[a] Division of GM and SM groups into subdivisions of d and u are for roads and airfields only. Subdivision is based on Atterberg limits, suffix d used when L.L. is 28 or less and the P.I. is 6 or less; the suffix u is used when L.L. is greater than 28.

[b] Borderline classifications, used for soils possessing characteristics of two groups, are designated by combinations of group sympols. For example GW-GC, well-graded gravel-sand mixture with clay binder.

GENERAL NOTES

SAMPLE IDENTIFICATION

All samples are visually classified in general accordance with the Unified Soil Classification System (ASTM D-2487-75 or D-2488-75)

DESCRIPTIVE TERM (% BY DRY WEIGHT)

Trace:	1-10%
Little:	11-20%
Some:	21-35%
And/Adjective	36-50%

PARTICLE SIZE (DIAMETER)

Boulders:	8 inch and larger
Cobbles:	3 inch to 8 inch
Gravel:	coarse - ¾ to 3 inch
	fine – No. 4 (4.76 mm) to ¾ inch
Sand:	coarse – No. 4 (4.76 mm) to No. 10 (2.0 mm)
	medium – No. 10 (2.0 mm) to No. 40 (0.42 mm)
	fine – No. 40 (0.42 mm) to No. 200 (0.074 mm)
Silt:	No. 200 (0.074 mm) and smaller (non-plastic)
Clay:	No 200 (0.074 mm) and smaller (plastic)

SOIL PROPERTY SYMBOLS

Dd:	Dry Density (pcf)
LL:	Liquid Limit, percent
PL:	Plastic Limit, percent
PI:	Plasticity Index (LL-PL)
LOI:	Loss on Ignition, percent
Gs:	Specific Gravity
K:	Coefficient of Permeability
w:	Moisture content, percent
qp:	Calibrated Penetrometer Resistance, tsf
qs:	Vane-Shear Strength, tsf
qu:	Unconfined Compressive Strength, tsf
qc:	Static Cone Penetrometer Resistance (correlated to Unconfined Compressive Strength, tsf)
PID:	Results of vapor analysis conducted on representative samples utilizing a Photoionization Detector calibrated to a benzene standard. Results expressed in HNU-Units. (BDL=Below Detection Limit)

DRILLING AND SAMPLING SYMBOLS

SS:	Split-Spoon
ST:	Shelby Tube – 3 inch O.D. (except where noted)
CS:	3 inch O.D. California Ring Sampler
DC:	Dynamic Cone Penetrometer per ASTM Special Technical Publication No. 399
AU:	Auger Sample
DB:	Diamond Bit
CB:	Carbide Bit
WS:	Wash Sample
RB:	Rock-Roller Bit
BS:	Bulk Sample
Note:	Depth intervals for sampling shown on Record of Subsurface Exploration are not indicative of sample recovery, but position where sampling initiated

N: Penetration Resistance per 12 inch interval, or fraction thereof, for a standard 2 inch O.D. (1⅜ inch I.D.) split spoon sampler driven with a 140 pound weight free-falling 30 inches. Performed in general accordance with Standard Penetration Test Specifications (ASTM D-1586). N in blows per foot equals sum of N-Values where plus sign (+) is shown.

Nc: Penetration Resistance per 1¾ inches of Dynamic Cone Penetrometer. Approximately equivalent to Standard Penetration Test N-Value in blows per foot.

Nr: Penetration Resistance per 12 inch interval, or fraction thereof, for California Ring Sampler driven with a 140 pound weight free-falling 30 inches per ASTM D-3550. Not equivalent to Standard Penetration Test N-Value.

SOIL STRENGTH CHARACTERISTICS

COHESIVE (CLAYEY) SOILS

COMPARATIVE CONSISTENCY	BLOWS PER FOOT (N)	UNCONFINED COMPRESSIVE STRENGTH (TSF)
Very Soft	0 - 2	0 - 0.25
Soft	3 - 4	0.25 - 0.50
Medium Stiff	5 – 8	0.50 - 1.00
Stiff	9 – 15	1.00 - 2.00
Very Stiff	16 – 30	2.00 - 4.00
Hard	31+	4.00+

NON-COHESIVE (GRANULAR) SOILS

RELATIVE DENSITY	BLOWS PER FOOT (N)
Very Loose	0 - 4
Loose	5 - 10
Firm	11 - 30
Dense	31 - 50
Very Dense	51+

DEGREE OF PLASTICITY	PI	DEGREE OF EXPANSIVE POTENTIAL	PI
None to Slight	0 - 4	Low	0 - 15
Slight	5 - 10	Medium	15 - 25
Medium	11 - 30	High	25+
High to Very High	31+		

Important Information About Your
Geotechnical Engineering Report

Subsurface problems are a principal cause of construction delays, cost overruns, claims, and disputes.

The following information is provided to help you manage your risks.

Geotechnical Services Are Performed for Specific Purposes, Persons, and Projects

Geotechnical engineers structure their services to meet the specific needs of their clients. A geotechnical engineering study conducted for a civil engineer may not fulfill the needs of a construction contractor or even another civil engineer. Because each geotechnical engineering study is unique, each geotechnical engineering report is unique, prepared *solely* for the client. No one except you should rely on your geotechnical engineering report without first conferring with the geotechnical engineer who prepared it. *And no one — not even you* — should apply the report for any purpose or project except the one originally contemplated.

Read the Full Report

Serious problems have occurred because those relying on a geotechnical engineering report did not read it all. Do not rely on an executive summary. Do not read selected elements only.

A Geotechnical Engineering Report Is Based on A Unique Set of Project-Specific Factors

Geotechnical engineers consider a number of unique, project-specific factors when establishing the scope of a study. Typical factors include: the client's goals, objectives, and risk management preferences; the general nature of the structure involved, its size, and configuration; the location of the structure on the site; and other planned or existing site improvements, such as access roads, parking lots, and underground utilities. Unless the geotechnical engineer who conducted the study specifically indicates otherwise, do not rely on a geotechnical engineering report that was:

- not prepared for you,
- not prepared for your project,
- not prepared for the specific site explored, or
- completed before important project changes were made.

Typical changes that can erode the reliability of an existing geotechnical engineering report include those that affect:

- the function of the proposed structure, as when it's changed from a parking garage to an office building, or from a light industrial plant to a refrigerated warehouse,
- elevation, configuration, location, orientation, or weight of the proposed structure,
- composition of the design team, or
- project ownership.

As a general rule, *always* inform your geotechnical engineer of project changes—even minor ones—and request an assessment of their impact. *Geotechnical engineers cannot accept responsibility or liability for problems that occur because their reports do not consider developments of which they were not informed.*

Subsurface Conditions Can Change

A geotechnical engineering report is based on conditions that existed at the time the study was performed. *Do not rely on a geotechnical engineering report* whose adequacy may have been affected by: the passage of time; by man-made events, such as construction on or adjacent to the site; or by natural events, such as floods, earthquakes, or groundwater fluctuations. *Always* contact the geotechnical engineer before applying the report to determine if it is still reliable. A minor amount of additional testing or analysis could prevent major problems.

Most Geotechnical Findings Are Professional Opinions

Site exploration identifies subsurface conditions only at those points where subsurface tests are conducted or samples are taken. Geotechnical engineers review field and laboratory data and then apply their professional judgment to render an opinion about subsurface conditions throughout the site. Actual subsurface conditions may differ—sometimes significantly—from those indicated in your report. Retaining the geotechnical engineer who developed your report to provide construction observation is the most effective method of managing the risks associated with unanticipated conditions.

A Report's Recommendations Are *Not* Final

Do not overrely on the construction recommendations included in your report. *Those recommendations are not final,* because geotechnical engineers develop them principally from judgment and opinion. Geotechnical engineers can finalize their recommendations only by observing actual

subsurface conditions revealed during construction. *The geotechnical engineer who developed your report cannot assume responsibility or liability for the report's recommendations if that engineer does not perform construction observation.*

A Geotechnical Engineering Report Is Subject to Misinterpretation

Other design team members' misinterpretation of geotechnical engineering reports has resulted in costly problems. Lower that risk by having your geotechnical engineer confer with appropriate members of the design team after submitting the report. Also retain your geotechnical engineer to review pertinent elements of the design team's plans and specifications. Contractors can also misinterpret a geotechnical engineering report. Reduce that risk by having your geotechnical engineer participate in prebid and preconstruction conferences, and by providing construction observation.

Do Not Redraw the Engineer's Logs

Geotechnical engineers prepare final boring and testing logs based upon their interpretation of field logs and laboratory data. To prevent errors or omissions, the logs included in a geotechnical engineering report should *never* be redrawn for inclusion in architectural or other design drawings. Only photographic or electronic reproduction is acceptable, *but recognize that separating logs from the report can elevate risk.*

Give Contractors a Complete Report and Guidance

Some owners and design professionals mistakenly believe they can make contractors liable for unanticipated subsurface conditions by limiting what they provide for bid preparation. To help prevent costly problems, give contractors the complete geotechnical engineering report, *but* preface it with a clearly written letter of transmittal. In that letter, advise contractors that the report was not prepared for purposes of bid development and that the report's accuracy is limited; encourage them to confer with the geotechnical engineer who prepared the report (a modest fee may be required) and/or to conduct additional study to obtain the specific types of information they need or prefer. A prebid conference can also be valuable. *Be sure contractors have sufficient time* to perform additional study. Only then might you be in a position to give contractors the best information available to you, while requiring them to at least share some of the financial responsibilities stemming from unanticipated conditions.

Read Responsibility Provisions Closely

Some clients, design professionals, and contractors do not recognize that geotechnical engineering is far less exact than other engineering disciplines. This lack of understanding has created unrealistic expectations that have led to disappointments, claims, and disputes. To help reduce the risk of such outcomes, geotechnical engineers commonly include a variety of explanatory provisions in their reports. Sometimes labeled "limitations" many of these provisions indicate where geotechnical engineers' responsibilities begin and end, to help others recognize their own responsibilities and risks. *Read these provisions closely.* Ask questions. Your geotechnical engineer should respond fully and frankly.

Geoenvironmental Concerns Are Not Covered

The equipment, techniques, and personnel used to perform a *geoenvironmental* study differ significantly from those used to perform a *geotechnical* study. For that reason, a geotechnical engineering report does not usually relate any geoenvironmental findings, conclusions, or recommendations; e.g., about the likelihood of encountering underground storage tanks or regulated contaminants. *Unanticipated environmental problems have led to numerous project failures.* If you have not yet obtained your own geoenvironmental information, ask your geotechnical consultant for risk management guidance. *Do not rely on an environmental report prepared for someone else.*

Obtain Professional Assistance To Deal with Mold

Diverse strategies can be applied during building design, construction, operation, and maintenance to prevent significant amounts of mold from growing on indoor surfaces. To be effective, all such strategies should be devised for the *express purpose* of mold prevention, integrated into a comprehensive plan, and executed with diligent oversight by a professional mold prevention consultant. Because just a small amount of water or moisture can lead to the development of severe mold infestations, a number of mold prevention strategies focus on keeping building surfaces dry. While groundwater, water infiltration, and similar issues may have been addressed as part of the geotechnical engineering study whose findings are conveyed in this report, the geotechnical engineer in charge of this project is not a mold prevention consultant; ***none of the services performed in connection with the geotechnical engineer's study were designed or conducted for the purpose of mold prevention. Proper implementation of the recommendations conveyed in this report will not of itself be sufficient to prevent mold from growing in or on the structure involved.***

Rely, on Your ASFE-Member Geotechncial Engineer for Additional Assistance

Membership in ASFE/The Best People on Earth exposes geotechnical engineers to a wide array of risk management techniques that can be of genuine benefit for everyone involved with a construction project. Confer with you ASFE-member geotechnical engineer for more information.

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GREENHOUSE GAS EMISSIONS OVERVIEW

12681 Jefferson Boulevard (Future) Detailed Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	12681 Jefferson Boulevard (Future)
Construction Start Date	9/18/2027
Operational Year	2028
Lead Agency	City of Los Angeles
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	3.50
Precipitation (days)	8.20
Location	12681 Jefferson Blvd, Los Angeles, CA 90066, USA
County	Los Angeles-South Coast
City	Los Angeles
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	4429
EDFZ	16
Electric Utility	Los Angeles Department of Water & Power
Gas Utility	Southern California Gas
App Version	2022.1.1.24

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description

Strip Mall	3.96	1000sqft	0.10	3,959	500	—	—	—
Parking Lot	78.0	Space	0.10	0.00	500	—	—	—
Industrial Park	78.4	1000sqft	0.90	78,365	1,000	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Unmit.	—	4,028	4,028	0.17	0.24	3.34	4,066
Daily, Winter (Max)	—	—	—	—	—	—	—
Unmit.	—	7,959	7,959	0.37	0.90	0.31	8,237
Average Daily (Max)	—	—	—	—	—	—	—
Unmit.	—	1,873	1,873	0.07	0.07	0.61	1,890
Annual (Max)	—	—	—	—	—	—	—
Unmit.	—	310	310	0.01	0.01	0.10	313

2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—
2027	—	3,978	3,978	0.17	0.24	3.34	4,058
2028	—	4,028	4,028	0.14	0.11	3.01	4,066

Daily - Winter (Max)	—	—	—	—	—	—	—
2027	—	7,959	7,959	0.37	0.90	0.31	8,237
2028	—	3,774	3,774	0.13	0.10	0.07	3,807
Average Daily	—	—	—	—	—	—	—
2027	—	889	889	0.04	0.07	0.44	911
2028	—	1,873	1,873	0.07	0.05	0.61	1,890
Annual	—	—	—	—	—	—	—
2027	—	147	147	0.01	0.01	0.07	151
2028	—	310	310	0.01	0.01	0.10	313

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Unmit.	89.9	5,499	5,589	9.42	0.20	26.8	5,912
Daily, Winter (Max)	—	—	—	—	—	—	—
Unmit.	89.9	5,390	5,480	9.43	0.21	20.6	5,798
Average Daily (Max)	—	—	—	—	—	—	—
Unmit.	89.9	5,426	5,515	9.43	0.21	23.2	5,837
Annual (Max)	—	—	—	—	—	—	—
Unmit.	14.9	898	913	1.56	0.03	3.83	966

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Mobile	—	2,293	2,293	0.11	0.09	6.33	2,330

Area	—	14.7	14.7	< 0.005	< 0.005	—	14.8
Energy	—	2,954	2,954	0.22	0.03	—	2,967
Water	35.3	237	273	3.64	0.09	—	390
Waste	54.6	0.00	54.6	5.46	0.00	—	191
Refrig.	—	—	—	—	—	20.4	20.4
Total	89.9	5,499	5,589	9.42	0.20	26.8	5,912
Daily, Winter (Max)	—	—	—	—	—	—	—
Mobile	—	2,199	2,199	0.11	0.10	0.16	2,230
Area	—	—	—	—	—	—	—
Energy	—	2,954	2,954	0.22	0.03	—	2,967
Water	35.3	237	273	3.64	0.09	—	390
Waste	54.6	0.00	54.6	5.46	0.00	—	191
Refrig.	—	—	—	—	—	20.4	20.4
Total	89.9	5,390	5,480	9.43	0.21	20.6	5,798
Average Daily	—	—	—	—	—	—	—
Mobile	—	2,224	2,224	0.11	0.10	2.74	2,258
Area	—	10.1	10.1	< 0.005	< 0.005	—	10.1
Energy	—	2,954	2,954	0.22	0.03	—	2,967
Water	35.3	237	273	3.64	0.09	—	390
Waste	54.6	0.00	54.6	5.46	0.00	—	191
Refrig.	—	—	—	—	—	20.4	20.4
Total	89.9	5,426	5,515	9.43	0.21	23.2	5,837
Annual	—	—	—	—	—	—	—
Mobile	—	368	368	0.02	0.02	0.45	374
Area	—	1.67	1.67	< 0.005	< 0.005	—	1.68
Energy	—	489	489	0.04	< 0.005	—	491
Water	5.84	39.3	45.1	0.60	0.01	—	64.6

Waste	9.04	0.00	9.04	0.90	0.00	—	31.6
Refrig.	—	—	—	—	—	3.38	3.38
Total	14.9	898	913	1.56	0.03	3.83	966

3. Construction Emissions Details

3.1. Demolition (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Off-Road Equipment	—	2,494	2,494	0.10	0.02	—	2,502
Demolition	—	—	—	—	—	—	—
Onsite truck	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—
Off-Road Equipment	—	2,494	2,494	0.10	0.02	—	2,502
Demolition	—	—	—	—	—	—	—
Onsite truck	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—
Off-Road Equipment	—	68.3	68.3	< 0.005	< 0.005	—	68.6
Demolition	—	—	—	—	—	—	—
Onsite truck	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—
Off-Road Equipment	—	11.3	11.3	< 0.005	< 0.005	—	11.4
Demolition	—	—	—	—	—	—	—
Onsite truck	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—
Worker	—	166	166	0.01	0.01	0.52	169
Vendor	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	—	1,319	1,319	0.06	0.21	2.82	1,387
Daily, Winter (Max)	—	—	—	—	—	—	—
Worker	—	157	157	< 0.005	0.01	0.01	159
Vendor	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	—	1,319	1,319	0.06	0.21	0.07	1,385
Average Daily	—	—	—	—	—	—	—
Worker	—	4.38	4.38	< 0.005	< 0.005	0.01	4.43
Vendor	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	—	36.1	36.1	< 0.005	0.01	0.03	38.0
Annual	—	—	—	—	—	—	—
Worker	—	0.72	0.72	< 0.005	< 0.005	< 0.005	0.73
Vendor	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	—	5.98	5.98	< 0.005	< 0.005	0.01	6.28

3.3. Site Preparation (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Off-Road Equipment	—	2,065	2,065	0.08	0.02	—	2,072
Dust From Material Movement	—	—	—	—	—	—	—
Onsite truck	—	0.00	0.00	0.00	0.00	0.00	0.00

Average Daily	—	—	—	—	—	—	—
Off-Road Equipment	—	67.9	67.9	< 0.005	< 0.005	—	68.1
Dust From Material Movement	—	—	—	—	—	—	—
Onsite truck	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—
Off-Road Equipment	—	11.2	11.2	< 0.005	< 0.005	—	11.3
Dust From Material Movement	—	—	—	—	—	—	—
Onsite truck	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Worker	—	94.5	94.5	< 0.005	< 0.005	0.01	95.6
Vendor	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—
Worker	—	3.15	3.15	< 0.005	< 0.005	< 0.005	3.19
Vendor	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—
Worker	—	0.52	0.52	< 0.005	< 0.005	< 0.005	0.53
Vendor	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	—	0.00	0.00	0.00	0.00	0.00	0.00

3.5. Grading (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Onsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Off-Road Equipment	—	2,455	2,455	0.10	0.02	—	2,464
Dust From Material Movement	—	—	—	—	—	—	—
Onsite truck	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—
Off-Road Equipment	—	141	141	0.01	< 0.005	—	142
Dust From Material Movement	—	—	—	—	—	—	—
Onsite truck	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—
Off-Road Equipment	—	23.4	23.4	< 0.005	< 0.005	—	23.5
Dust From Material Movement	—	—	—	—	—	—	—
Onsite truck	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Worker	—	126	126	< 0.005	< 0.005	0.01	127
Vendor	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	—	5,377	5,377	0.27	0.88	0.30	5,645
Average Daily	—	—	—	—	—	—	—
Worker	—	7.36	7.36	< 0.005	< 0.005	0.01	7.45
Vendor	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	—	309	309	0.02	0.05	0.28	325
Annual	—	—	—	—	—	—	—
Worker	—	1.22	1.22	< 0.005	< 0.005	< 0.005	1.23

Vendor	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	—	51.2	51.2	< 0.005	0.01	0.05	53.8

3.7. Building Construction (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Off-Road Equipment	—	1,801	1,801	0.07	0.01	—	1,807
Onsite truck	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—
Off-Road Equipment	—	155	155	0.01	< 0.005	—	156
Onsite truck	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—
Off-Road Equipment	—	25.7	25.7	< 0.005	< 0.005	—	25.8
Onsite truck	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Worker	—	431	431	0.01	0.02	0.04	436
Vendor	—	413	413	0.02	0.06	0.03	430
Hauling	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—
Worker	—	37.6	37.6	< 0.005	< 0.005	0.05	38.1
Vendor	—	35.5	35.5	< 0.005	< 0.005	0.04	37.1
Hauling	—	0.00	0.00	0.00	0.00	0.00	0.00

Annual	—	—	—	—	—	—	—
Worker	—	6.23	6.23	< 0.005	< 0.005	0.01	6.31
Vendor	—	5.88	5.88	< 0.005	< 0.005	0.01	6.14
Hauling	—	0.00	0.00	0.00	0.00	0.00	0.00

3.9. Building Construction (2028) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Off-Road Equipment	—	1,801	1,801	0.07	0.01	—	1,807
Onsite truck	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—
Off-Road Equipment	—	1,801	1,801	0.07	0.01	—	1,807
Onsite truck	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—
Off-Road Equipment	—	927	927	0.04	0.01	—	930
Onsite truck	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—
Off-Road Equipment	—	153	153	0.01	< 0.005	—	154
Onsite truck	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Worker	—	446	446	< 0.005	0.02	1.27	452
Vendor	—	403	403	0.01	0.06	1.02	421
Hauling	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—

Worker	—	423	423	0.01	0.02	0.03	428
Vendor	—	403	403	0.01	0.06	0.03	421
Hauling	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—
Worker	—	221	221	< 0.005	0.01	0.28	224
Vendor	—	207	207	0.01	0.03	0.23	217
Hauling	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—
Worker	—	36.6	36.6	< 0.005	< 0.005	0.05	37.0
Vendor	—	34.3	34.3	< 0.005	< 0.005	0.04	35.9
Hauling	—	0.00	0.00	0.00	0.00	0.00	0.00

3.11. Paving (2028) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Off-Road Equipment	—	991	991	0.04	0.01	—	995
Paving	—	—	—	—	—	—	—
Onsite truck	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—
Off-Road Equipment	—	991	991	0.04	0.01	—	995
Paving	—	—	—	—	—	—	—
Onsite truck	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—
Off-Road Equipment	—	416	416	0.02	< 0.005	—	417
Paving	—	—	—	—	—	—	—

Onsite truck	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—
Off-Road Equipment	—	68.8	68.8	< 0.005	< 0.005	—	69.0
Paving	—	—	—	—	—	—	—
Onsite truck	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Worker	—	163	163	< 0.005	0.01	0.47	165
Vendor	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—
Worker	—	155	155	< 0.005	0.01	0.01	157
Vendor	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—
Worker	—	65.8	65.8	< 0.005	< 0.005	0.08	66.6
Vendor	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—
Worker	—	10.9	10.9	< 0.005	< 0.005	0.01	11.0
Vendor	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	—	0.00	0.00	0.00	0.00	0.00	0.00

3.13. Architectural Coating (2028) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—
Off-Road Equipment	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	—	—	—	—	—	—	—
Onsite truck	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—
Off-Road Equipment	—	16.1	16.1	< 0.005	< 0.005	—	16.2
Architectural Coatings	—	—	—	—	—	—	—
Onsite truck	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—
Off-Road Equipment	—	2.66	2.66	< 0.005	< 0.005	—	2.67
Architectural Coatings	—	—	—	—	—	—	—
Onsite truck	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Worker	—	89.2	89.2	< 0.005	< 0.005	0.25	90.5
Vendor	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—
Worker	—	10.3	10.3	< 0.005	< 0.005	0.01	10.5
Vendor	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—
Worker	—	1.71	1.71	< 0.005	< 0.005	< 0.005	1.74
Vendor	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	—	0.00	0.00	0.00	0.00	0.00	0.00

3.15. Trenching (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Off-Road Equipment	—	207	207	0.01	< 0.005	—	208
Onsite truck	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—
Off-Road Equipment	—	17.9	17.9	< 0.005	< 0.005	—	17.9
Onsite truck	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—
Off-Road Equipment	—	2.96	2.96	< 0.005	< 0.005	—	2.97
Onsite truck	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Worker	—	63.0	63.0	< 0.005	< 0.005	0.01	63.7
Vendor	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—
Worker	—	5.50	5.50	< 0.005	< 0.005	0.01	5.57
Vendor	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—
Worker	—	0.91	0.91	< 0.005	< 0.005	< 0.005	0.92
Vendor	—	0.00	0.00	0.00	0.00	0.00	0.00

Hauling	—	0.00	0.00	0.00	0.00	0.00	0.00

3.17. Trenching (2028) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Off-Road Equipment	—	208	208	0.01	< 0.005	—	208
Onsite truck	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—
Off-Road Equipment	—	7.31	7.31	< 0.005	< 0.005	—	7.34
Onsite truck	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—
Off-Road Equipment	—	1.21	1.21	< 0.005	< 0.005	—	1.21
Onsite truck	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Worker	—	61.9	61.9	< 0.005	< 0.005	< 0.005	62.6
Vendor	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—
Worker	—	2.21	2.21	< 0.005	< 0.005	< 0.005	2.24
Vendor	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—

Worker	—	0.37	0.37	< 0.005	< 0.005	< 0.005	0.37
Vendor	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	—	0.00	0.00	0.00	0.00	0.00	0.00

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Mobile source emissions results are presented in Sections 2.6. No further detailed breakdown of emissions is available.

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Strip Mall	—	74.6	74.6	0.01	< 0.005	—	74.9
Parking Lot	—	7.22	7.22	< 0.005	< 0.005	—	7.25
Industrial Park	—	2,361	2,361	0.17	0.02	—	2,372
Total	—	2,443	2,443	0.17	0.02	—	2,454
Daily, Winter (Max)	—	—	—	—	—	—	—
Strip Mall	—	74.6	74.6	0.01	< 0.005	—	74.9
Parking Lot	—	7.22	7.22	< 0.005	< 0.005	—	7.25
Industrial Park	—	2,361	2,361	0.17	0.02	—	2,372
Total	—	2,443	2,443	0.17	0.02	—	2,454
Annual	—	—	—	—	—	—	—
Strip Mall	—	12.3	12.3	< 0.005	< 0.005	—	12.4
Parking Lot	—	1.19	1.19	< 0.005	< 0.005	—	1.20

Industrial Park	—	391	391	0.03	< 0.005	—	393
Total	—	404	404	0.03	< 0.005	—	406

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Strip Mall	—	6.25	6.25	< 0.005	< 0.005	—	6.27
Parking Lot	—	0.00	0.00	0.00	0.00	—	0.00
Industrial Park	—	505	505	0.04	< 0.005	—	506
Total	—	511	511	0.05	< 0.005	—	512
Daily, Winter (Max)	—	—	—	—	—	—	—
Strip Mall	—	6.25	6.25	< 0.005	< 0.005	—	6.27
Parking Lot	—	0.00	0.00	0.00	0.00	—	0.00
Industrial Park	—	505	505	0.04	< 0.005	—	506
Total	—	511	511	0.05	< 0.005	—	512
Annual	—	—	—	—	—	—	—
Strip Mall	—	1.03	1.03	< 0.005	< 0.005	—	1.04
Parking Lot	—	0.00	0.00	0.00	0.00	—	0.00
Industrial Park	—	83.5	83.5	0.01	< 0.005	—	83.8
Total	—	84.6	84.6	0.01	< 0.005	—	84.8

4.3. Area Emissions by Source

4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—
Consumer Products	—	—	—	—	—	—	—
Architectural Coatings	—	—	—	—	—	—	—
Landscape Equipment	—	14.7	14.7	< 0.005	< 0.005	—	14.8
Total	—	14.7	14.7	< 0.005	< 0.005	—	14.8
Daily, Winter (Max)	—	—	—	—	—	—	—
Consumer Products	—	—	—	—	—	—	—
Architectural Coatings	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—
Consumer Products	—	—	—	—	—	—	—
Architectural Coatings	—	—	—	—	—	—	—
Landscape Equipment	—	1.67	1.67	< 0.005	< 0.005	—	1.68
Total	—	1.67	1.67	< 0.005	< 0.005	—	1.68

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Strip Mall	0.56	3.85	4.41	0.06	< 0.005	—	6.28
Parking Lot	0.00	0.07	0.07	< 0.005	< 0.005	—	0.07
Industrial Park	34.7	233	268	3.58	0.09	—	384
Total	35.3	237	273	3.64	0.09	—	390
Daily, Winter (Max)	—	—	—	—	—	—	—
Strip Mall	0.56	3.85	4.41	0.06	< 0.005	—	6.28

Parking Lot	0.00	0.07	0.07	< 0.005	< 0.005	—	0.07
Industrial Park	34.7	233	268	3.58	0.09	—	384
Total	35.3	237	273	3.64	0.09	—	390
Annual	—	—	—	—	—	—	—
Strip Mall	0.09	0.64	0.73	0.01	< 0.005	—	1.04
Parking Lot	0.00	0.01	0.01	< 0.005	< 0.005	—	0.01
Industrial Park	5.75	38.7	44.4	0.59	0.01	—	63.5
Total	5.84	39.3	45.1	0.60	0.01	—	64.6

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Strip Mall	2.24	0.00	2.24	0.22	0.00	—	7.84
Parking Lot	0.00	0.00	0.00	0.00	0.00	—	0.00
Industrial Park	52.4	0.00	52.4	5.23	0.00	—	183
Total	54.6	0.00	54.6	5.46	0.00	—	191
Daily, Winter (Max)	—	—	—	—	—	—	—
Strip Mall	2.24	0.00	2.24	0.22	0.00	—	7.84
Parking Lot	0.00	0.00	0.00	0.00	0.00	—	0.00
Industrial Park	52.4	0.00	52.4	5.23	0.00	—	183
Total	54.6	0.00	54.6	5.46	0.00	—	191
Annual	—	—	—	—	—	—	—
Strip Mall	0.37	0.00	0.37	0.04	0.00	—	1.30
Parking Lot	0.00	0.00	0.00	0.00	0.00	—	0.00

Industrial Park	8.67	0.00	8.67	0.87	0.00	—	30.3
Total	9.04	0.00	9.04	0.90	0.00	—	31.6

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	0.02	0.02
Industrial Park	—	—	—	—	—	20.4	20.4
Total	—	—	—	—	—	20.4	20.4
Daily, Winter (Max)	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	0.02	0.02
Industrial Park	—	—	—	—	—	20.4	20.4
Total	—	—	—	—	—	20.4	20.4
Annual	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	< 0.005	< 0.005
Industrial Park	—	—	—	—	—	3.38	3.38
Total	—	—	—	—	—	3.38	3.38

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—

Annual	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Demolition	Demolition	9/18/2027	10/2/2027	5.00	10.0	—
Site Preparation	Site Preparation	10/3/2027	10/19/2027	5.00	12.0	—
Grading	Grading	10/20/2027	11/17/2027	5.00	21.0	—
Building Construction	Building Construction	11/18/2027	9/19/2028	5.00	219	—
Paving	Paving	2/18/2028	9/19/2028	5.00	153	—
Architectural Coating	Architectural Coating	7/20/2028	9/19/2028	5.00	44.0	—
Trenching	Trenching	11/18/2027	1/18/2028	5.00	44.0	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Concrete/Industrial Saws	Diesel	Average	1.00	8.00	33.0	0.73
Demolition	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Demolition	Tractors/Loaders/Backhoes	Diesel	Average	3.00	8.00	84.0	0.37
Site Preparation	Graders	Diesel	Average	1.00	8.00	148	0.41
Site Preparation	Rubber Tired Dozers	Diesel	Average	1.00	7.00	367	0.40
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Average	1.00	8.00	84.0	0.37
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Grading	Tractors/Loaders/Backhoes	Diesel	Average	2.00	7.00	84.0	0.37
Building Construction	Cranes	Diesel	Average	1.00	6.00	367	0.29

Building Construction	Forklifts	Diesel	Average	1.00	6.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	1.00	6.00	84.0	0.37
Building Construction	Welders	Diesel	Average	3.00	8.00	46.0	0.45
Paving	Cement and Mortar Mixers	Diesel	Average	1.00	6.00	10.0	0.56
Paving	Pavers	Diesel	Average	1.00	6.00	81.0	0.42
Paving	Paving Equipment	Diesel	Average	1.00	8.00	89.0	0.36
Paving	Rollers	Diesel	Average	1.00	7.00	36.0	0.38
Paving	Tractors/Loaders/Backhoes	Diesel	Average	1.00	8.00	84.0	0.37
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48
Trenching	Trenchers	Diesel	Average	1.00	8.00	40.0	0.50

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	—	—	—	—
Demolition	Worker	12.5	18.5	LDA,LDT1,LDT2
Demolition	Vendor	—	10.2	HHDT,MHDT
Demolition	Hauling	15.9	25.0	HHDT
Demolition	Onsite truck	—	—	HHDT
Site Preparation	—	—	—	—
Site Preparation	Worker	7.50	18.5	LDA,LDT1,LDT2
Site Preparation	Vendor	—	10.2	HHDT,MHDT
Site Preparation	Hauling	0.00	25.0	HHDT

Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	10.0	18.5	LDA,LDT1,LDT2
Grading	Vendor	—	10.2	HHDT,MHDT
Grading	Hauling	80.6	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	34.2	18.5	LDA,LDT1,LDT2
Building Construction	Vendor	13.5	10.2	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	12.5	18.5	LDA,LDT1,LDT2
Paving	Vendor	—	10.2	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	6.84	18.5	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	10.2	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT
Trenching	—	—	—	—
Trenching	Worker	5.00	18.5	LDA,LDT1,LDT2
Trenching	Vendor	—	10.2	HHDT,MHDT
Trenching	Hauling	0.00	20.0	HHDT
Trenching	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	0.00	0.00	123,486	41,162	261

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (Ton of Debris)	Acres Paved (acres)
Demolition	0.00	0.00	0.00	633	—
Site Preparation	—	—	11.3	0.00	—
Grading	—	13,541	1.00	0.00	—
Paving	0.00	0.00	0.00	0.00	0.10

5.6.2. Construction Earthmoving Control Strategies

Control Strategies Applied	Frequency (per day)	PM10 Reduction	PM2.5 Reduction
Water Exposed Area	2	61%	61%
Water Demolished Area	2	36%	36%

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt

Strip Mall	0.00	0%
Parking Lot	0.10	100%
Industrial Park	0.00	0%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2027	0.00	690	0.05	0.01
2028	0.00	690	0.05	0.01

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Total all Land Uses	382	382	382	139,430	3,012	3,012	3,012	1,099,380

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
0	0.00	123,486	41,162	261

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	250

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Strip Mall	39,418	690	0.0489	0.0069	19,495
Parking Lot	3,816	690	0.0489	0.0069	0.00
Industrial Park	1,248,256	690	0.0489	0.0069	1,574,499

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Strip Mall	293,253	7,012
Parking Lot	0.00	7,012
Industrial Park	18,121,906	14,025

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Strip Mall	4.16	—
Parking Lot	0.00	—

Industrial Park	97.2	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Strip Mall	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
Strip Mall	Stand-alone retail refrigerators and freezers	R-134a	1,430	0.04	1.00	0.00	1.00
Strip Mall	Walk-in refrigerators and freezers	R-404A	3,922	< 0.005	7.50	7.50	20.0
Industrial Park	Other commercial A/C and heat pumps	R-410A	2,088	0.30	4.00	4.00	18.0

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor

5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)

5.17. User Defined

Equipment Type	Fuel Type

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	5.27	annual days of extreme heat

Extreme Precipitation	5.20	annual days with precipitation above 20 mm
Sea Level Rise	0.00	meters of inundation depth
Wildfire	0.00	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	1	0	0	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	0	0	N/A
Wildfire	1	0	0	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	1	1	1	2
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	1	1	2
Wildfire	1	1	1	2
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	37.6
AQ-PM	64.7
AQ-DPM	63.4
Drinking Water	52.7
Lead Risk Housing	0.24
Pesticides	0.00

Toxic Releases	82.0
Traffic	79.0
Effect Indicators	—
CleanUp Sites	70.2
Groundwater	96.1
Haz Waste Facilities/Generators	83.6
Impaired Water Bodies	99.6
Solid Waste	11.6
Sensitive Population	—
Asthma	19.6
Cardio-vascular	22.5
Low Birth Weights	30.8
Socioeconomic Factor Indicators	—
Education	4.21
Housing	64.8
Linguistic	26.4
Poverty	16.8
Unemployment	39.2

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	72.87309124
Employed	73.4377005
Median HI	74.22045425
Education	—

Bachelor's or higher	97.74156294
High school enrollment	100
Preschool enrollment	51.02014629
Transportation	—
Auto Access	84.51174131
Active commuting	53.36840755
Social	—
2-parent households	64.04465546
Voting	60.19504684
Neighborhood	—
Alcohol availability	53.62504812
Park access	32.97831387
Retail density	81.27807006
Supermarket access	77.58244578
Tree canopy	56.62774285
Housing	—
Homeownership	25.94636212
Housing habitability	44.62979597
Low-inc homeowner severe housing cost burden	65.50750674
Low-inc renter severe housing cost burden	25.94636212
Uncrowded housing	84.29359682
Health Outcomes	—
Insured adults	76.54305146
Arthritis	98.1
Asthma ER Admissions	97.2
High Blood Pressure	97.4
Cancer (excluding skin)	77.2

Asthma	88.8
Coronary Heart Disease	98.1
Chronic Obstructive Pulmonary Disease	99.1
Diagnosed Diabetes	98.2
Life Expectancy at Birth	73.5
Cognitively Disabled	98.4
Physically Disabled	93.4
Heart Attack ER Admissions	94.8
Mental Health Not Good	91.8
Chronic Kidney Disease	98.0
Obesity	89.8
Pedestrian Injuries	44.8
Physical Health Not Good	99.0
Stroke	98.4
Health Risk Behaviors	—
Binge Drinking	7.5
Current Smoker	92.2
No Leisure Time for Physical Activity	99.1
Climate Change Exposures	—
Wildfire Risk	28.1
SLR Inundation Area	27.1
Children	22.0
Elderly	92.4
English Speaking	71.9
Foreign-born	32.4
Outdoor Workers	96.3
Climate Change Adaptive Capacity	—

Impervious Surface Cover	17.3
Traffic Density	61.9
Traffic Access	87.4
Other Indices	—
Hardship	8.7
Other Decision Support	—
2016 Voting	44.7

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	36.0
Healthy Places Index Score for Project Location (b)	79.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification

Land Use	Developer plans
Construction: Construction Phases	Developer information
Construction: Off-Road Equipment	Model defaults
Construction: Dust From Material Movement	9,000 CY with soil expansion factors for topsoil and dry clay
Construction: Trips and VMT	.

12681 Jefferson Boulevard Project

GHG Emissions Impact Compared to "Project Without Reduction Features" Scenario

Source	Project Without Reduction Features (2028)	As Proposed (2028)	Reduction from Project Without Reduction Features	Change from Project Without Reduction Features Scenario
Area	2	2	-	0%
Energy	847	491	(356)	-42%
Mobile	533	374	(159)	-30%
Waste	32	32	-	0%
Water	65	65	-	0%
Refrigerants	3	3	-	0%
Construction	15	15	-	0%
Total Emissions	1,496	982	(514)	-34.4%



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AMBIENT NOISE MEASUREMENTS

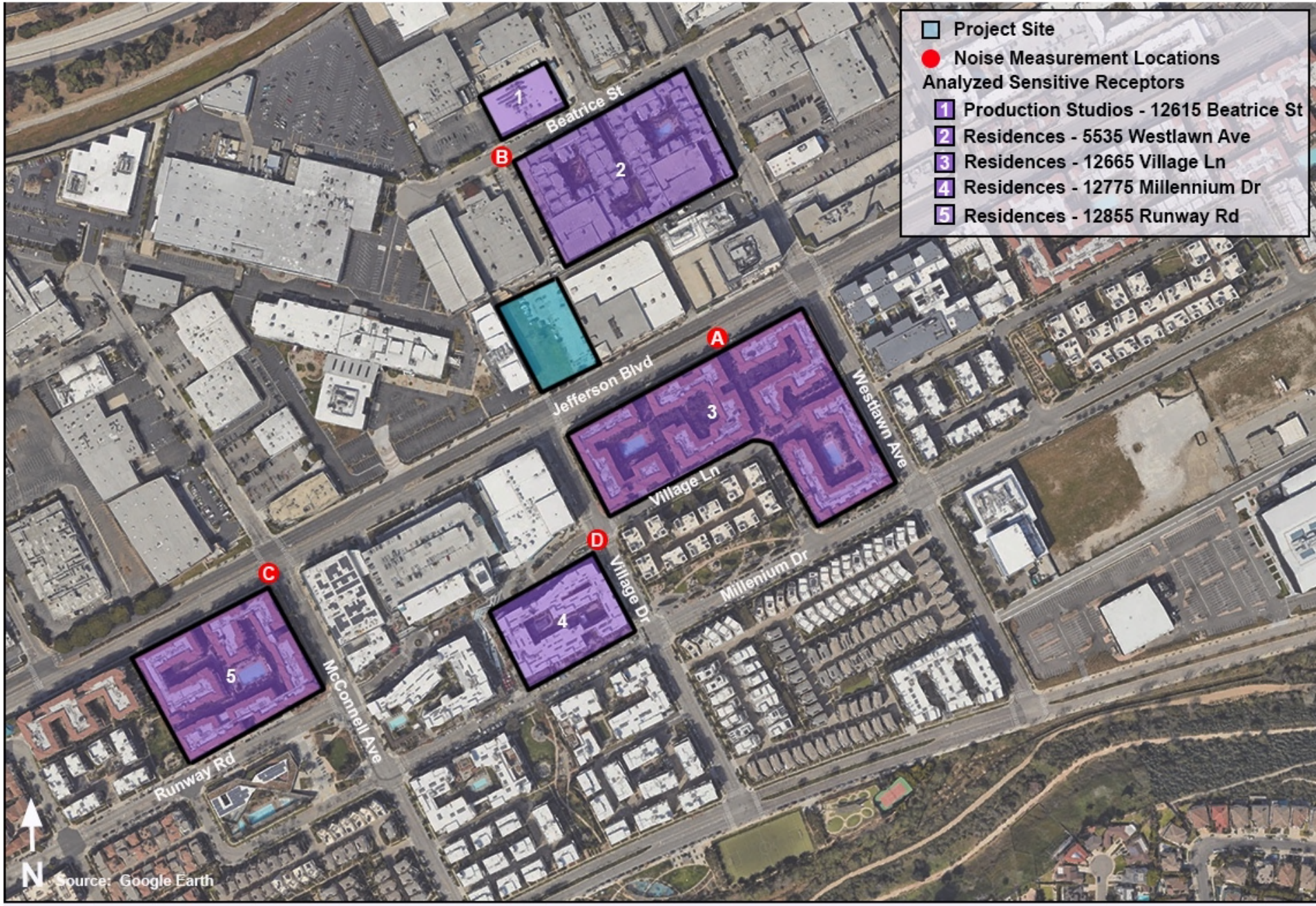

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Figure 1
Noise Measurement Locations

Session Report

10/13/2022

Information Panel

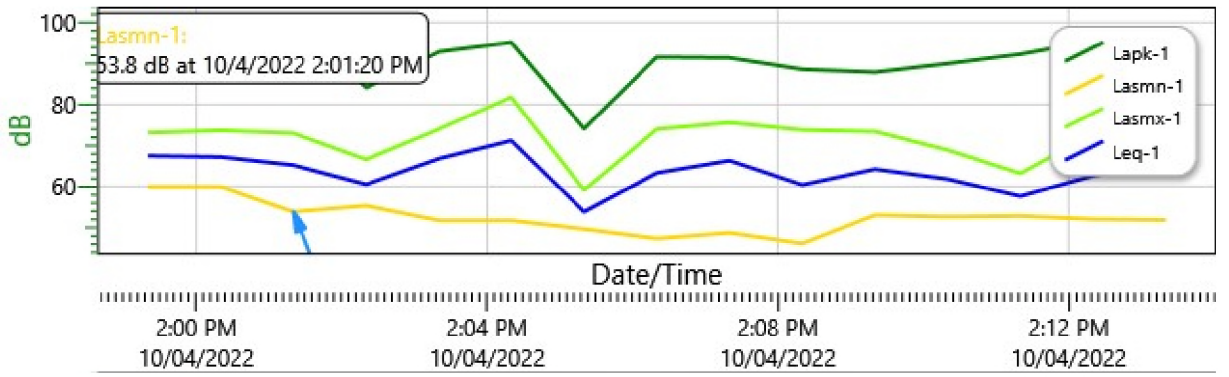
Name	Avalon Playa Vista - Beatrice Ave frontage
Comments	
Start Time	10/4/2022 1:58:20 PM
Stop Time	10/4/2022 2:13:29 PM
Run Time	00:15:09
Serial Number	SE40213991
Device Name	SE40213991
Model Type	Sound Examiner
Device Firmware Rev	R.11C
Company Name	
Description	
Location	
User Name	

Summary Data Panel

Description	Meter	Value	Description	Meter	Value
Leq	1	65.3 dB			
Exchange Rate	1	3 dB	Weighting	1	A
Response	1	SLOW	Bandwidth	1	OFF

Logged Data Chart

Avalon Playa Vista - Beatrice Ave frontage: Logged Data Chart



Logged Data Table

Date/Time	Lapk-1	Lasmn-1	Lasmx-1	Leq-1

Date/Time	Lapk-1	Lasmn-1	Lasmx-1	Leq-1
10/4/2022 1:59:20 PM	88.8	59.9	73.1	67.5
2:00:20 PM	98.1	59.9	73.7	67.2
2:01:20 PM	101.1	53.8	73	65.2
2:02:20 PM	84.1	55.3	66.6	60.5
2:03:20 PM	92.9	51.7	74	66.8
2:04:20 PM	95.2	51.7	81.8	71.2
2:05:20 PM	74.1	49.6	59.1	53.8
2:06:20 PM	91.6	47.3	74	63.3
2:07:20 PM	91.4	48.7	75.6	66.3
2:08:20 PM	88.6	46.1	73.8	60.4
2:09:20 PM	87.9	53	73.4	64.2
2:10:20 PM	90	52.6	68.9	61.8
2:11:20 PM	92.3	52.8	63.2	57.6
2:12:20 PM	95.6	52	72.9	62.6
2:13:20 PM	91.7	51.8	77.2	66

Session Report

1/24/2023

Information Panel

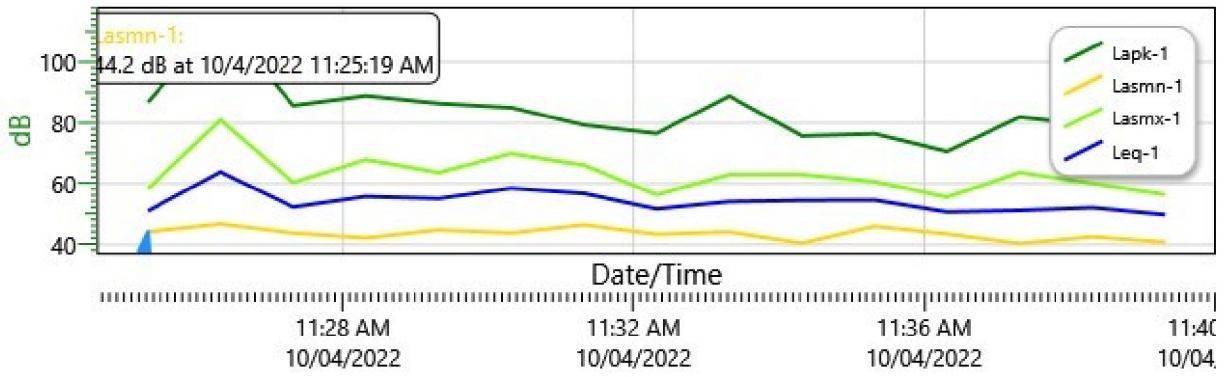
Name	12665 Village Lane
Comments	
Start Time	10/4/2022 11:24:19 AM
Stop Time	10/4/2022 11:39:31 AM
Run Time	00:15:12
Serial Number	SE40213991
Device Name	SE40213991
Model Type	Sound Examiner
Device Firmware Rev	R.11C
Company Name	
Description	
Location	
User Name	

Summary Data Panel

Description	Meter	Value	Description	Meter	Value
Leq	1	56.2 dB			
Exchange Rate	1	3 dB	Weighting	1	A
Response	1	SLOW	Bandwidth	1	OFF

Logged Data Chart

12665 Village Lane: Logged Data Chart



Logged Data Table

Date/Time	Lapk-1	Lasmn-1	Lasmx-1	Leq-1

Date/Time	Lapk-1	Lasmn-1	Lasmx-1	Leq-1
10/4/2022 11:25:19 AM	86.8	44.2	58.3	51
11:26:19 AM	114.4	46.8	81	63.9
11:27:19 AM	85.7	43.8	60.4	52.3
11:28:19 AM	88.9	42.2	67.9	55.8
11:29:19 AM	86.4	44.8	63.7	55.1
11:30:19 AM	85	43.8	69.9	58.5
11:31:19 AM	79.3	46.5	66.1	56.8
11:32:19 AM	76.5	43.4	56.4	51.7
11:33:19 AM	88.8	44.2	63	54.1
11:34:19 AM	75.7	40.5	63	54.5
11:35:19 AM	76.4	46	60.7	54.6
11:36:19 AM	70.6	43.5	55.6	50.7
11:37:19 AM	81.9	40.4	63.7	51.2
11:38:19 AM	79.2	42.6	60.1	52.1
11:39:19 AM	82.1	40.8	56.4	49.8

Session Report

10/13/2022

Information Panel

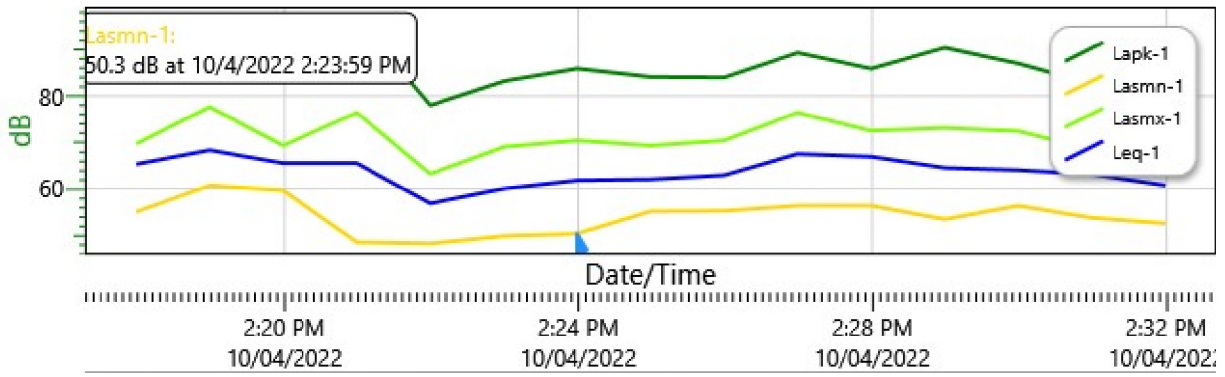
Name	Villas at Playa Vista - Jefferson frontage
Comments	
Start Time	10/4/2022 2:16:59 PM
Stop Time	10/4/2022 2:32:03 PM
Run Time	00:15:04
Serial Number	SE40213991
Device Name	SE40213991
Model Type	Sound Examiner
Device Firmware Rev	R.11C
Company Name	
Description	
Location	
User Name	

Summary Data Panel

Description	Meter	Value	Description	Meter	Value
Leq	1	64.5 dB			
Exchange Rate	1	3 dB	Weighting	1	A
Response	1	SLOW	Bandwidth	1	OFF

Logged Data Chart

Villas at Playa Vista - Jefferson frontage: Logged Data Chart



Logged Data Table

Date/Time	Lapk-1	Lasmn-1	Lasmx-1	Leq-1

Date/Time	Lapk-1	Lasmn-1	Lasmx-1	Leq-1
10/4/2022 2:17:59 PM	84.6	55	69.7	65.3
2:18:59 PM	90.4	60.7	77.6	68.3
2:19:59 PM	88.5	59.6	69.3	65.5
2:20:59 PM	96.8	48.5	76.4	65.5
2:21:59 PM	78	48.2	63.2	56.8
2:22:59 PM	83.2	49.8	69	60
2:23:59 PM	85.9	50.3	70.4	61.8
2:24:59 PM	84.1	55.1	69.3	62
2:25:59 PM	84	55.2	70.4	62.9
2:26:59 PM	89.3	56.3	76.4	67.5
2:27:59 PM	85.9	56.3	72.5	66.9
2:28:59 PM	90.4	53.4	73.1	64.5
2:29:59 PM	87	56.3	72.4	64
2:30:59 PM	82.6	53.7	68.4	63.1
2:31:59 PM	84.1	52.5	70.2	60.7

Session Report

10/13/2022

Information Panel

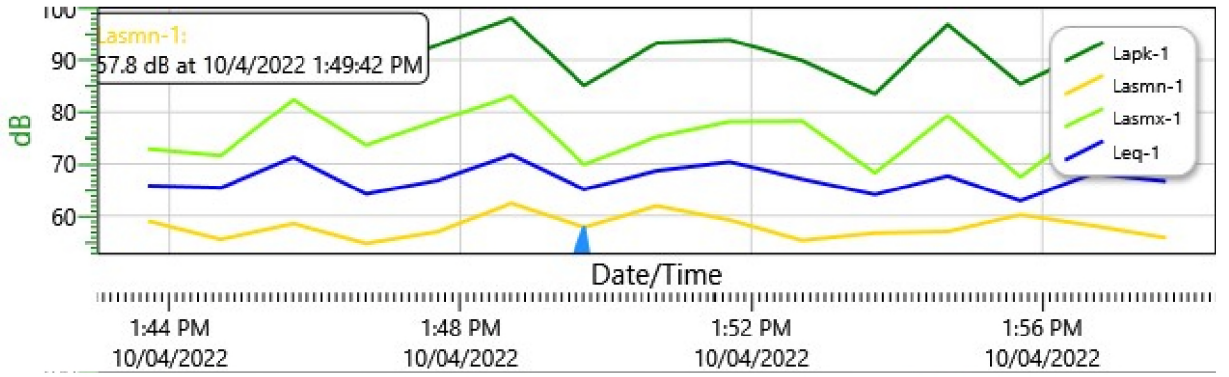
Name	Villas at Playa Vista - Jefferson Bl frontage
Comments	
Start Time	10/4/2022 1:42:42 PM
Stop Time	10/4/2022 1:57:47 PM
Run Time	00:15:05
Serial Number	SE40213991
Device Name	SE40213991
Model Type	Sound Examiner
Device Firmware Rev	R.11C
Company Name	
Description	
Location	
User Name	

Summary Data Panel

Description	Meter	Value	Description	Meter	Value
Leq	1	67.8 dB			
Exchange Rate	1	3 dB	Weighting	1	A
Response	1	SLOW	Bandwidth	1	OFF

Logged Data Chart

Villas at Playa Vista - Jefferson Bl frontage: Logged Data Chart



Logged Data Table

Date/Time	Lapk-1	Lasmn-1	Lasmx-1	Leq-1

Date/Time	Lapk-1	Lasmn-1	Lasmx-1	Leq-1
10/4/2022 1:43:42 PM	87.1	59	72.9	65.8
1:44:42 PM	86.9	55.5	71.6	65.4
1:45:42 PM	95.4	58.5	82.4	71.3
1:46:42 PM	87.9	54.7	73.6	64.2
1:47:42 PM	93	57	78.4	66.9
1:48:42 PM	98.1	62.4	83.1	71.8
1:49:42 PM	85.1	57.8	69.9	65.1
1:50:42 PM	93.3	61.9	75.2	68.7
1:51:42 PM	93.9	59.2	78.1	70.4
1:52:42 PM	89.9	55.3	78.2	67.1
1:53:42 PM	83.5	56.7	68.3	64.1
1:54:42 PM	96.9	57	79.3	67.7
1:55:42 PM	85.4	60.2	67.5	62.9
1:56:42 PM	92.1	58.1	77.9	68.2
1:57:42 PM	87.2	55.8	75.8	66.7



DouglasKim+Associates,LLC

CONSTRUCTION NOISE CALCULATIONS

Noise emissions of industry sources

Source name	Size m/m²	Reference	Level Day dB(A)	Level Evening dB(A)	Level Night dB(A)	Corrections Cwall dB	Corrections CI dB	Corrections CT dB
Construction Site	3930 m²	Lw/unit	109.7	-	-	-	-	-

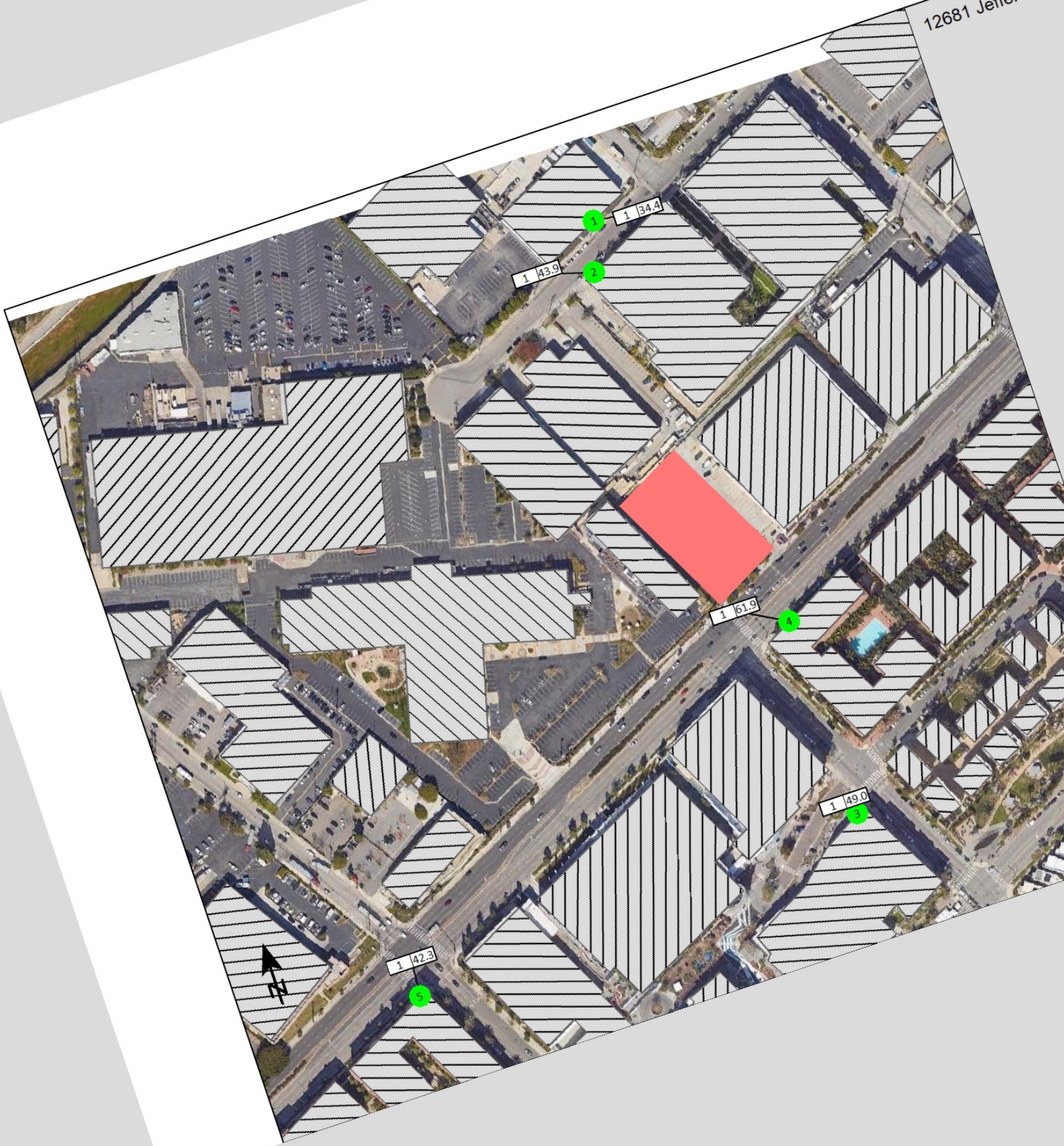
Receiver list

No.	Receiver name	Coordinates X	Coordinates Y	Building side	Floor	Height abv.grd. m	Limit Day dB(A)	Level Day dB(A)	Conflict Day dB
		in meter							
1	Production Studios - 12615 Beatri	11369168.19	3760898.56	South eas	GF	9.62	-	34.4	-
2	Residences - 5535 Westlawn Ave	11369158.51	3760869.64	North wes	GF	9.55	-	43.9	-
3	Residences - 12665 Village Lane	11369204.60	3760513.97	North wes	GF	12.00	-	49.0	-
4		11369202.47	3760635.27	North wes	GF	9.01	-	61.9	-
5	Residences - 12855 Runway Roa	11368922.85	3760493.59	North wes	GF	9.85	-	42.3	-

Contribution levels of the receivers

Source name		Traffic lane	Level Day dB(A)
Production Studios - 12615 Beatrice Street	GF		34.4
Construction Site		-	34.4
Residences - 5535 Westlawn Avenue	GF		43.9
Construction Site		-	43.9
Residences - 12665 Village Lane	GF		49.0
Construction Site		-	49.0
Residences - 12665 Village Lane	GF		61.9
Construction Site		-	61.9
Residences - 12855 Runway Road	GF		42.3
Construction Site		-	42.3

12681 Jefferson Boulevard



Signs and symbols

- Building
- Analyzed Sensitive Receptor
- Construction Site

1 : 208

0 37.575 150 225 300 feet

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12681 Jefferson Boulevard

Signs and symbols

Building

Construction Site

Levels in dB(A)

< 25
25 - 30
30 - 35
35 - 40
40 - 45
45 - 50
50 - 55
55 - 60
60 - 65
65 - 70
70 - 75
75 - 80
80 - 85
>= 85

1 : 208

0 37.575 150 225 300 feet

N

DouglasKim+Associates,LLC

Construction Noise Impacts



Reference	15.24	meter
Sound Pressure Level (Lp)	75.0	dBA
Sound Power Level (Lw)	109.7	dB

Receptor	Existing Leq	Noise	New Leq	Difference Leq	Significant?
Production Studios - 12615 Beatrice Street	65.3	34.4	65.3	0.0	**No**
Residences - 5535 Westlawn Aveue	65.3	43.9	65.3	0.0	**No**
Residences - 12665 Village Lane	67.8	61.9	68.8	1.0	**No**
Residences - 12775 Millennium Drive	56.2	49.0	57.0	0.8	**No**
Residences - 12855 Runway Road	64.5	42.3	64.5	0.0	**No**

OFF-SITE CONSTRUCTION-RELATED TRAVEL VOLUMES

Construction Phase	Worker Trips	Vendor Trips	Haul Trips	Total	% of Traffic Volumes
Demolition	12.5	0	28.9	41	1.3%
Site Preparation	7.5	0		8	0.2%
Grading	10	0	351.9	362	11.0%
Trenching	5	0		5	0.2%
Building Construction	36.9	39.6		76	2.3%
Paving	12.5	0.0		13	0.4%
Architectural Coatings	7.37	0		7.37	0.2%

Haul trips represent heavy-duty truck trips with a 19.1 Passenger Car Equivalent applied; Vendor trips are a blend cf vehicle types with a 9.5

3,293 Traffic Volumes on Jefferson Boulevard at Westlawn Avenue in the peak A.M. hou



DouglasKim+Associates,LLC

TRAFFIC NOISE CALCULATIONS

24 Hours Traffic Volume

City of Los Angeles

Department of Transportation

Counter	A. Delas Alas
Date	04/17/18
Start Time	12 AM

Location	**JEFFERSON BL AT WESTLAWN AV**	**Day of Week**	WED	**Prepared**	04/19/18
Direction	E/W STREET	**DOT District**	WESTERN	**By**	A. Delas Alas
Serial Number	17861	**Weather**	CLEAR		

	NORTHBOUND or WESTBOUND					SOUTHBOUND or EASTBOUND					
Time	1ST QTR	2ND QTR	3RD QTR	4TH QTR	HOUR TOTAL	1ST QTR	2ND QTR	3RD QTR	4TH QTR	HOUR TOTAL	**TOTAL**
12 AM	44	28	30	24	126	47	31	42	25	145	271
1 AM	19	20	23	10	72	25	17	20	13	75	147
2 AM	18	19	19	14	70	10	13	15	11	49	119
3 AM	9	15	20	46	90	8	10	11	13	42	132
4 AM	26	28	36	69	159	14	18	10	9	51	210
5 AM	81	104	148	217	550	29	31	51	63	174	724
6 AM	206	195	203	233	837	84	96	151	157	488	1325
7 AM	279	246	327	337	1189	231	280	328	396	1235	2424
8 AM	371	396	402	453	1622	426	383	353	349	1511	3133
9 AM	467	437	423	415	1742	391	360	306	320	1377	3119
10 AM	395	379	318	317	1409	306	224	262	263	1055	2464
11 AM	282	317	342	358	1299	299	244	275	247	1065	2364
12 NN	322	372	336	354	1384	263	268	290	296	1117	2501
1 PM	326	375	382	386	1469	306	299	313	321	1239	2708
2 PM	309	333	326	377	1345	326	279	300	279	1184	2529
3 PM	355	353	344	378	1430	360	306	320	306	1292	2722
4 PM	363	355	354	387	1459	313	280	314	257	1164	2623
5 PM	371	418	409	458	1656	324	311	316	287	1238	2894
6 PM	438	423	390	368	1619	323	323	316	283	1245	2864
7 PM	401	335	347	322	1405	301	268	285	247	1101	2506
8 PM	306	281	227	239	1053	299	255	221	236	1011	2064
9 PM	240	197	189	184	810	223	199	182	153	757	1567
10 PM	150	129	126	108	513	154	142	130	100	526	1039
11 PM	75	64	62	42	243	96	76	71	40	283	526

FIRST 12-HOURS PEAK QUARTER COUNT	**467**	9 AM	1ST	**426**	8 AM	1ST
LAST 12-HOURS PEAK QUARTER COUNT	**458**	5 PM	4TH	**360**	3 PM	1ST
24 HOUR VEHICLES TOTAL		23,551			19,424	**42,975**
TOTAL VEHICLES STANDARD DEVIATION (STD)	[+,-]	583.97		[+,-]	499.53	1075.89

PEAK HOURS VOLUME

	NORTH or WEST BOUND		SOUTH or EAST BOUND		BOTH DIRECTIONS	
	PEAK HOUR	VEHICLE VOLUME	PEAK HOUR	VEHICLE VOLUME	PEAK HOUR	VEHICLE VOLUME
First 12H Peak	9 AM	1,742	8 AM	1,511	8 AM	**3,133**
Last 12H Peak	5 PM	1,656	3 PM	1,292	5 PM	**2,894**
First 12H Peak STD	[+,-]	633.41	[+,-]	566.63	[+,-]	1191.26
Last 12H Peak STD	[+,-]	431.50	[+,-]	308.16	[+,-]	735.54

TRAFFIC VOLUME ADJUSTMENTS



North/South	Westlawn Avenue
East/West	Jefferson Boulevard
Year	2018
Hour	8:00-9:00 A.M.
Source	https://navigatela.lacity.org/dot/traffic_data/automatic_counts/JEFFERSON.WESTLAWN.180418.pdf

	NB Approach	SB Approach	EB Approach	WB Approach		
LT						
TH						
RT						
Total			1511	1622		1.07%

2018	-	-	1,511	1,622	-	
2019	-	-	1,526	1,638	-	
2020	-	-	1,541	1,655	-	
2021	-	-	1,557	1,671	-	
2022	-	-	1,572	1,688	-	
2023	-	-	1,588	1,705	-	**3,293**

	NB Approach	SB Approach	EB Approach	WB Approach		
Auto	-	-	1,310	1,406	6,048,810	82.5%
MDT	-	-	204	219	940,092	12.8%
HDT	-	-	5	6	25,348	0.3%
Buses	-	-	2	2	9,386	0.1%
MCY	-	-	36	39	167,287	2.3%
Aux	-	-	31	33	142,856	1.9%
Total	-	-	1,588	1,705	7,333,779	100.0%



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DEMOLITION ANALYSIS

DouglasKim+Associates,LLC

CONSTRUCTION BUILDING DEBRIS

Materials	Total SF	Height	Cubic Yards	Pounds per Cub	Tons	Truck Capacity (CY)	Truck Trips	Source
Construction and Debris	0	0	-	484	-	10	-	Florida Department of Environmental Protection A Fact Sheet for C&D Debris Facility Operators
General Building		12	-	1,000	-	10	-	*Federal Emergency Management Agency, Debris Estimating Field Guide (FEMA 329), September 2010. General Building Formula*
Single Family Residence	-	12	-	1,000	-	10	-	Federal Emergency Management Agency. Debris Estimating Field Guide (FEMA 329), September 2010. Single Family Residence Formula, assumes 1 story, Medium vegetative cover multiplier (1.3)
Multi-Family Residence		12	-	1,000	-	10	-	
Mobile Home				1,000	-	10	-	
Mixed Debris			-	480	-	10	-	Florida Department of Environmental Protection A Fact Sheet for C&D Debris Facility Operators
Vegetative Debris (Hardwoods)			-	500	-	10	-	
Vegetative Debris (Softwoods)			-	333	-	10	-	
Asphalt or concrete (Constructior	28,500	0.5	528	2,400	633	10	106	
TOTAL			528		633		106	



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GRADING ANALYSIS

DouglasKim+Associates,LLC

SOIL TRANSPORT WITH SHRINK AND SWELL FACTORS

	CY	% Swell	Adjusted CY	Truck Capacity (CY)	Truck Trips
Topsoil	682	56%	1,064	10	213
Clay (Dry)	8,318	50%	12,477	10	2,495
Clay (Damp)		67%	-	10	-
Earth, loam (Dry)		50%	-	10	-
Earth, loam (Damp)		43%	-	10	-
Dry sand		11%	-	10	-
TOTAL	9,000		13,541		2,708

Note: Topsoil considered the top ten inches of soil (Wikipedia)
Note: Soil below topsoil assumed to be dry clay; Source: Lyngso website, https://www.lyngsogarden.com/community-resources/tips-on-modifying-your-california-soil-with-amendments/
Source: US Department of Transportation Determination of Excavation and Embankment Volumes; https://highways.dot.gov/federal-lands/pddm/dpg/earthwork-design



DouglasKim+Associates,LLC

CUMULATIVE PROJECTS



DouglasKim+Associates,LLC

CLATS

RELATED PROJECTS

Centroid Info:
PROJ ID: 47665
Address: 12681 W JEFFERSON BLVD
LOS ANGELES, CA 90066
Lat/Long: 33.9788, -118.416

Buffer Radius: 1400 feet
Search

Include NULL "Trip info":
Include NULL "FirstStudySubmittalDate" (latest)
Include "Inactive" projects:
Include "Do not show in Related Project":
Net_AM_Trips - Select -
Net_PM_Trips - Select -
Net_Daily_Trips - Select -

Column

Record Count: 6 | Record Per Page: All Records

Results generated since: (11/7/2022 11:26:34 AM)

Proj ID	Office	Area	CD	Year	Project Title	Project Desc	Address	First Study Submittal Date	Distance (feet)
42565	Westchester	CTC	11	2014	12777 Jefferson	Office expansion, 49,950sf	12777 W JEFFERSON BLVD	12/18/2014	676.6
43866	Westchester	CTC	11	2015	New Muti-Story Office Building	Demolish Ex 23 KSF Office Building & Construct 250 KSF Office Building	12575 W BEATRICE ST	03/21/2016	883.9
44419	Westchester	CTC	11	2016	Jandy Creative office	Creative office and Parking	5405 S JANDY PL	06/05/2017	750.5
45275	Westchester	CTC	11	2016	COU Office to Medical Office	Change of Use from Office to Medical Office within 3rd Floor Only	12555 W JEFFERSON BLVD	06/15/2017	863.5
47665	Westchester	CTC	11	2018	Public Storage Facility	expand 216,584 sf Public Storage by adding 129,252 sf Mini-Warehouse	12681 W JEFFERSON BLVD	10/30/2018	0.0
49398	Westchester	CTC	11	2020	Beatrice West Project	(N) MU bdg 196,100 sf of office & 3,400 sf of high-turnover restaurant	12575 W Beatrice St	08/04/2020	849.4

Trip Info

Land_Use	Unit_ID	size	Net_AM_Trips	Net_PM_Trips	Net_Daily_Trips	NetAMIn	NetAMOut	NetPMIn	NetPMOut	Comments
Office	S.F. Gross Area	49950	77	100	550	68	9	17	83	49,950 sf Office addition
			77	**100**	**550**		**68**	**9**	**17**	**83**

Land_Use	Unit_ID	size	Net_AM_Trips	Net_PM_Trips	Net_Daily_Trips	NetAMIn	NetAMOut	NetPMIn	NetPMOut	Comments
Office	S.F. Gross Area	199500	275	334	1946	242	33	57	277	Revised Proposal.
			275	**334**	**1946**		**242**	**33**	**57**	**277**

Land_Use	Unit_ID	size	Net_AM_Trips	Net_PM_Trips	Net_Daily_Trips	NetAMIn	NetAMOut	NetPMIn	NetPMOut	Comments
Office	S.F. Gross Area	93950	96	184	613	86	10	30	154	COU: Warehouse & Office to All Creative Office & Parking structure
			96	**184**	**613**		**86**	**10**	**30**	**154**

Land_Use	Unit_ID	size	Net_AM_Trips	Net_PM_Trips	Net_Daily_Trips	NetAMIn	NetAMOut	NetPMIn	NetPMOut	Comments
Other	S.F. Gross Area	20981	36	57	542	28	8	16	41	COU: Office to Medical Office (10,092 sf) with Outpatient Surgery facility (10,889 sf)
Other	S.F. Gross Area	15934			356					COU from office to Medical office (Portion of 1st floor Med Office & portion of 2nd floor R&D)
			36	**57**	**898**		**28**	**8**	**16**	**41**

Land_Use	Unit_ID	size	Net_AM_Trips	Net_PM_Trips	Net_Daily_Trips	NetAMIn	NetAMOut	NetPMIn	NetPMOut	Comments
Other	S.F. Gross Area	129252	13	39	195	8	5	18	21	expand exist 216,584 sf Public Storage by adding, new 129,252 sf Mini-Warehouse (Storage) bldg
			13	**39**	**195**		**8**	**5**	**18**	**21**

Land_Use	Unit_ID	size	Net_AM_Trips	Net_PM_Trips	Net_Daily_Trips	NetAMIn	NetAMOut	NetPMIn	NetPMOut	Comments
Mixed Use	S.F. Gross Area	199500	234	232	2049					ITE & VMT 1.2 calcs
Mixed Use	S.F. Gross Area	287381			2964					VMT 1.3 - Updated TM considers (E) uses to remain
			234	**232**	**5013**		**0**	**0**	**0**	**0**

Noise emissions of industry sources

Source name	Size m/m²	Reference	Level Day dB(A)	Level Evening dB(A)	Level Night dB(A)	Corrections Cwall dB	Corrections CI dB	Corrections CT dB
Construction Site	3930 m²	Lw/unit	109.7	-	-	-	-	-
Related Project - 12777 Jefferson Blvd.	2651 m²	Lw/unit	109.7	-	-	-	-	-
Related Project - 12575 Beatrice St.	6098 m²	Lw/unit	109.7	-	-	-	-	-
Related Project - 5405 Jandy Pl.	8284 m²	Lw/unit	109.7	-	-	-	-	-
Related Project - 12555 Jefferson Blvd.	2242 m²	Lw/unit	109.7	-	-	-	-	-

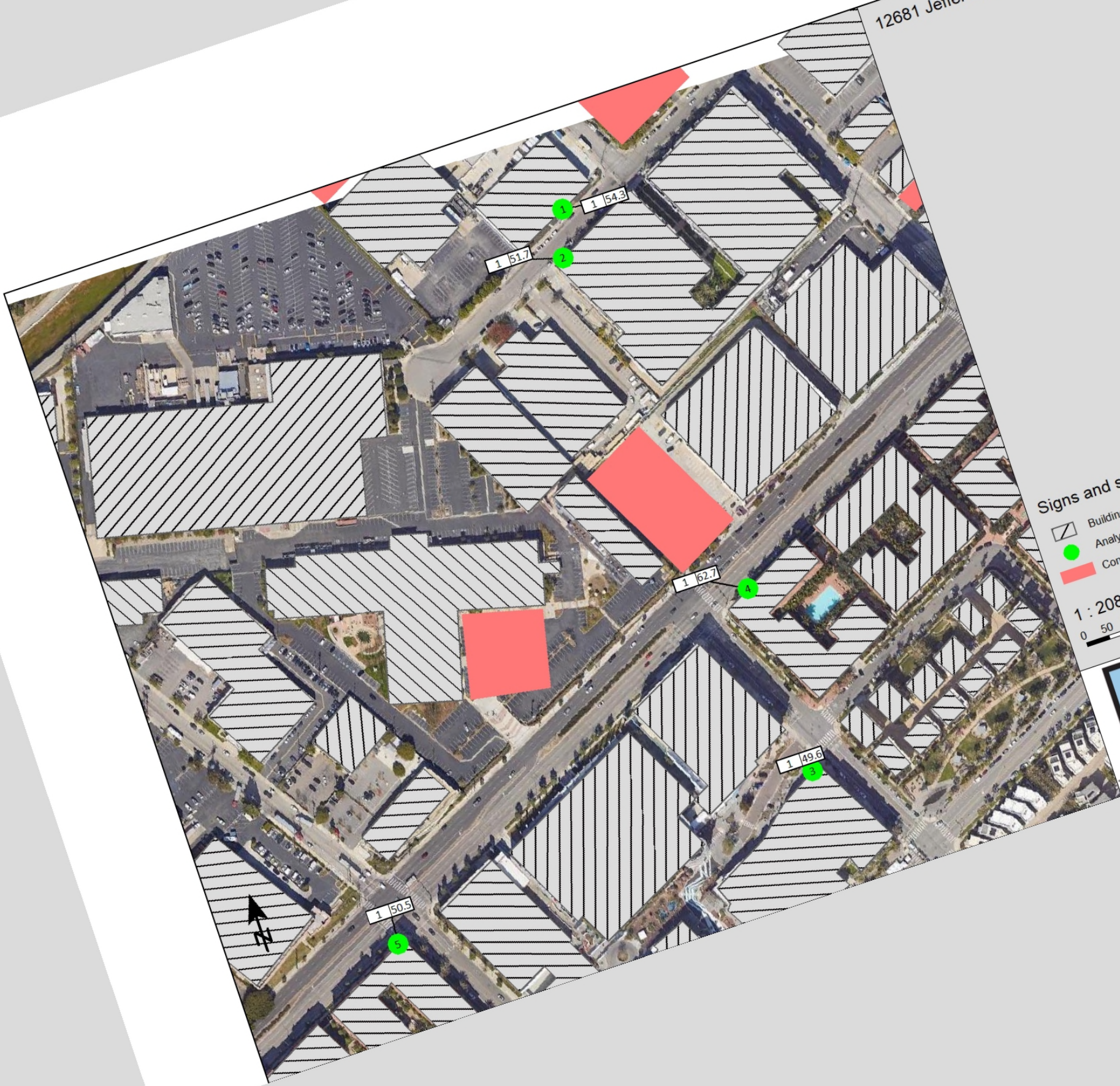
Receiver list

No.	Receiver name	Coordinates X in meter	Coordinates Y in meter	Building side	Floor	Height abv.grd. m	Limit Day dB(A)	Level Day dB(A)	Conflict Day dB
1	Production Studios - 12615 Beatrice S	11369168.19	3760898.56	South east	GF	9.62	-	54.3	-
2	Residences - 5535 Westlawn Avenue	11369158.51	3760869.64	North west	GF	9.55	-	51.7	-
3	Residences - 12665 Village Lane	11369204.60	3760513.97	North west	GF	12.00	-	49.6	-
4		11369202.47	3760635.27	North west	GF	9.01	-	62.7	-
5	Residences - 12855 Runway Road	11368922.85	3760493.59	North west	GF	9.85	-	50.5	-

Contribution levels of the receivers

Source name		Traffic lane	Level Day dB(A)
Production Studios - 12615 Beatrice Street	GF		54.3
Construction Site		-	34.4
Related Project - 5405 Jandy Pl.		-	37.0
Related Project - 12555 Jefferson Blvd.		-	31.6
Related Project - 12575 Beatrice St.		-	54.1
Related Project - 12777 Jefferson Blvd.		-	32.0
Residences - 5535 Westlawn Avenue	GF		51.7
Construction Site		-	43.9
Related Project - 5405 Jandy Pl.		-	34.1
Related Project - 12555 Jefferson Blvd.		-	31.8
Related Project - 12575 Beatrice St.		-	50.7
Related Project - 12777 Jefferson Blvd.		-	30.9
Residences - 12665 Village Lane	GF		49.6
Construction Site		-	49.0
Related Project - 5405 Jandy Pl.		-	32.3
Related Project - 12555 Jefferson Blvd.		-	28.7
Related Project - 12575 Beatrice St.		-	30.1
Related Project - 12777 Jefferson Blvd.		-	39.2
Residences - 12665 Village Lane	GF		62.7
Construction Site		-	61.9
Related Project - 5405 Jandy Pl.		-	34.8
Related Project - 12555 Jefferson Blvd.		-	31.9
Related Project - 12575 Beatrice St.		-	31.6
Related Project - 12777 Jefferson Blvd.		-	54.6
Residences - 12855 Runway Road	GF		50.5
Construction Site		-	42.3
Related Project - 5405 Jandy Pl.		-	27.7
Related Project - 12555 Jefferson Blvd.		-	31.7
Related Project - 12575 Beatrice St.		-	28.3
Related Project - 12777 Jefferson Blvd.		-	49.7

12681 Jefferson Boulevard



Signs and symbols

Building

Analyzed Sensitive Receptor

Construction Site

1 : 208

0 50 100 200 300 400 feet

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12681 Jefferson Boulevard

Signs and symbols

Building

Construction Site

Levels in dB(A)

< 25
25 - 30
30 - 35
35 - 40
40 - 45
45 - 50
50 - 55
55 - 60
60 - 65
65 - 70
70 - 75
75 - 80
80 - 85
>= 85

1 : 208

0 50 100 200 300 400 feet

N

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Cumulative Construction Noise Impacts

DouglasKim+Associates,LLC

Reference	15.24	meter
Sound Pressure Level (Lp)	75.0	dBA
Sound Power Level (Lw)	109.7	dB

Receptor	Existing Leq	Noise	New Leq	Difference Leq	Significant?
Production Studios - 12615 Beatrice Street	65.3	54.3	65.6	0.3	**No**
Residences - 5535 Westlawn Aveue	65.3	51.7	65.5	0.2	**No**
Residences - 12665 Village Lane	67.8	62.7	69.0	1.2	**No**
Residences - 12775 Millennium Drive	56.2	49.6	57.1	0.9	**No**
Residences - 12855 Runway Road	64.5	50.5	64.7	0.2	**No**

Note: Sound Power Level (Lw) assumes full sphere propagation

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12681 Jefferson Boulevard Project

Construction Vibration

Receptor: 12681 Jefferson Boulevard
Equipment: Large Bulldozer, Auger Drill Rig

Source PPV (in/sec)	0.089
Reference Distance (ft)	25
Ground Factor (N)	1
Distance (ft)	50
Vibration Level (in/sec)	**0.045**

Receptor: 12681 Jefferson Boulevard
Equipment: Loaded Trucks

Source PPV (in/sec)	0.076
Reference Distance (ft)	25
Ground Factor (N)	1
Distance (ft)	50
Vibration Level (in/sec)	**0.038**

Receptor: 12636 Beatrice Street
Equipment: Large Bulldozer, Auger Drill Rig

Source PPV (in/sec)	0.089
Reference Distance (ft)	25
Ground Factor (N)	1
Distance (ft)	50
Vibration Level (in/sec)	**0.045**

Receptor: 12636 Beatrice Street
Equipment: Loaded Trucks

Source PPV (in/sec)	0.076
Reference Distance (ft)	25
Ground Factor (N)	1
Distance (ft)	50
Vibration Level (in/sec)	**0.038**

12681 Jefferson Boulevard Project

Receptor: 12681 Jefferson Boulevard
Equipment: Small Dozer-Type Equipment

Source PPV (in/sec)	0.003
Reference Distance (ft)	25
Ground Factor (N)	1
Distance (ft)	50
Vibration Level (in/sec)	**0.002**

Receptor: 12681 Jefferson Boulevard
Equipment: Jackhammer

Source PPV (in/sec)	0.035
Reference Distance (ft)	25
Ground Factor (N)	1
Distance (ft)	50
Vibration Level (in/sec)	**0.018**

Receptor: 12636 Beatrice Street
Equipment: Small Dozer-Type Equipment

Source PPV (in/sec)	0.003
Reference Distance (ft)	25
Ground Factor (N)	1
Distance (ft)	50
Vibration Level (in/sec)	**0.002**

Receptor: 12636 Beatrice Street
Equipment: Jackhammer

Source PPV (in/sec)	0.035
Reference Distance (ft)	25
Ground Factor (N)	1
Distance (ft)	50
Vibration Level (in/sec)	**0.018**

Sources

California Department of Transportation (Caltrans), *Transportation and Construction Vibration Guidance Manual*,
Federal Transit Administration (FTA), *Transit Noise and Vibration Impact Assessment*, May 2006

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12681 Jefferson Boulevard Project

Construction Vibration

Receptor: 12777 Jefferson Boulevard
Equipment: Large Bulldozer, Auger Drill Rig

Source PPV (in/sec)	0.089
Reference Distance (ft)	25
Ground Factor (N)	1
Distance (ft)	15
Vibration Level (in/sec)	**0.148**

Receptor: 12777 Jefferson Boulevard
Equipment: Loaded Trucks

Source PPV (in/sec)	0.076
Reference Distance (ft)	25
Ground Factor (N)	1
Distance (ft)	15
Vibration Level (in/sec)	**0.127**

Receptor: 12665 Village Lane
Equipment: Large Bulldozer, Auger Drill Rig

Source PPV (in/sec)	0.089
Reference Distance (ft)	25
Ground Factor (N)	1
Distance (ft)	130
Vibration Level (in/sec)	**0.017**

Receptor: 12665 Village Lane
Equipment: Loaded Trucks

Source PPV (in/sec)	0.076
Reference Distance (ft)	25
Ground Factor (N)	1
Distance (ft)	130
Vibration Level (in/sec)	**0.015**

12681 Jefferson Boulevard Project

Receptor: 12777 Jefferson Boulevard
Equipment: Small Dozer-Type Equipment

Source PPV (in/sec)	0.003
Reference Distance (ft)	25
Ground Factor (N)	1
Distance (ft)	15
Vibration Level (in/sec)	**0.005**

Receptor: 12777 Jefferson Boulevard
Equipment: Jackhammer

Source PPV (in/sec)	0.035
Reference Distance (ft)	25
Ground Factor (N)	1
Distance (ft)	15
Vibration Level (in/sec)	**0.058**

Receptor: 12665 Village Lane
Equipment: Small Dozer-Type Equipment

Source PPV (in/sec)	0.003
Reference Distance (ft)	25
Ground Factor (N)	1
Distance (ft)	130
Vibration Level (in/sec)	**0.001**

Receptor: 12665 Village Lane
Equipment: Jackhammer

Source PPV (in/sec)	0.035
Reference Distance (ft)	25
Ground Factor (N)	1
Distance (ft)	130
Vibration Level (in/sec)	**0.007**

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Arcadia, CA 91006
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TECHNICAL MEMORANDUM

TO: Mr. Robert Sanchez, P.E., LADOT
CC: Ms. Cherry Miao, Public Storage

FROM: Srinath Raju, P.E.
Christopher Muñoz

SUBJECT: Public Storage Expansion Project - 12681 W. Jefferson Boulevard
Updated Trip Generation Analysis and Transportation Assessment Screening

DATE: January 31, 2024 **REF:** RA 691

This technical memorandum provides an update to the trip generation analysis and transportation assessment screening for the proposed Public Storage Expansion Project (the Project) located at 12681 W. Jefferson Boulevard (APN 4211-005-017, 4211-009-025, 4211-009-028) within the City of Los Angeles, California. The original Trip Generation Analysis and Transportation Screening Memo dated December 6, 2022, with a subsequent revision submitted January 18, 2023, was approved by the City of Los Angeles Department of Transportation (LADOT), see Attachment A – *Traffic Assessment for the Proposed Public Storage Building Expansion Prcject Located at 12681 West Jefferson Boulevard*. Due to recent changes to the Project description, the trip generation analysis and transportation assessment screening has been updated and is included below.

This evaluation and analysis include a description of existing site conditions, a summary of the proposed Project description, a summary of the existing site and Project trip generation estimates, and a comparison of the subject trip generation estimates with the threshold that warrants preparation of a formal transportation assessment analysis per LADOT screening criteria. Details of this evaluation are presented in subsequent sections of this memorandum.

The results conclude that the Project does not meet or exceed thresholds to warrant preparation of a formal transportation assessment per LADOT screening criteria. Therefore, no further analysis is required for purposes of satisfying the requirements of the California Environmental Quality Act (CEQA).

The findings are discussed in more detail in the following sections.

EXISTING SITE CONDITIONS

The Project Site is located at 12681 W. Jefferson Boulevard on the north side of Jefferson Boulevard between Village Drive and Westlawn Avenue. The Project Site is generally bounded by light manufacturing to the north, Jefferson Boulevard to the south, office uses to the west, and light manufacturing / office uses to the east. The Project site and general vicinity are shown in Figure 1. The existing Project Site is shown in Figure 2.

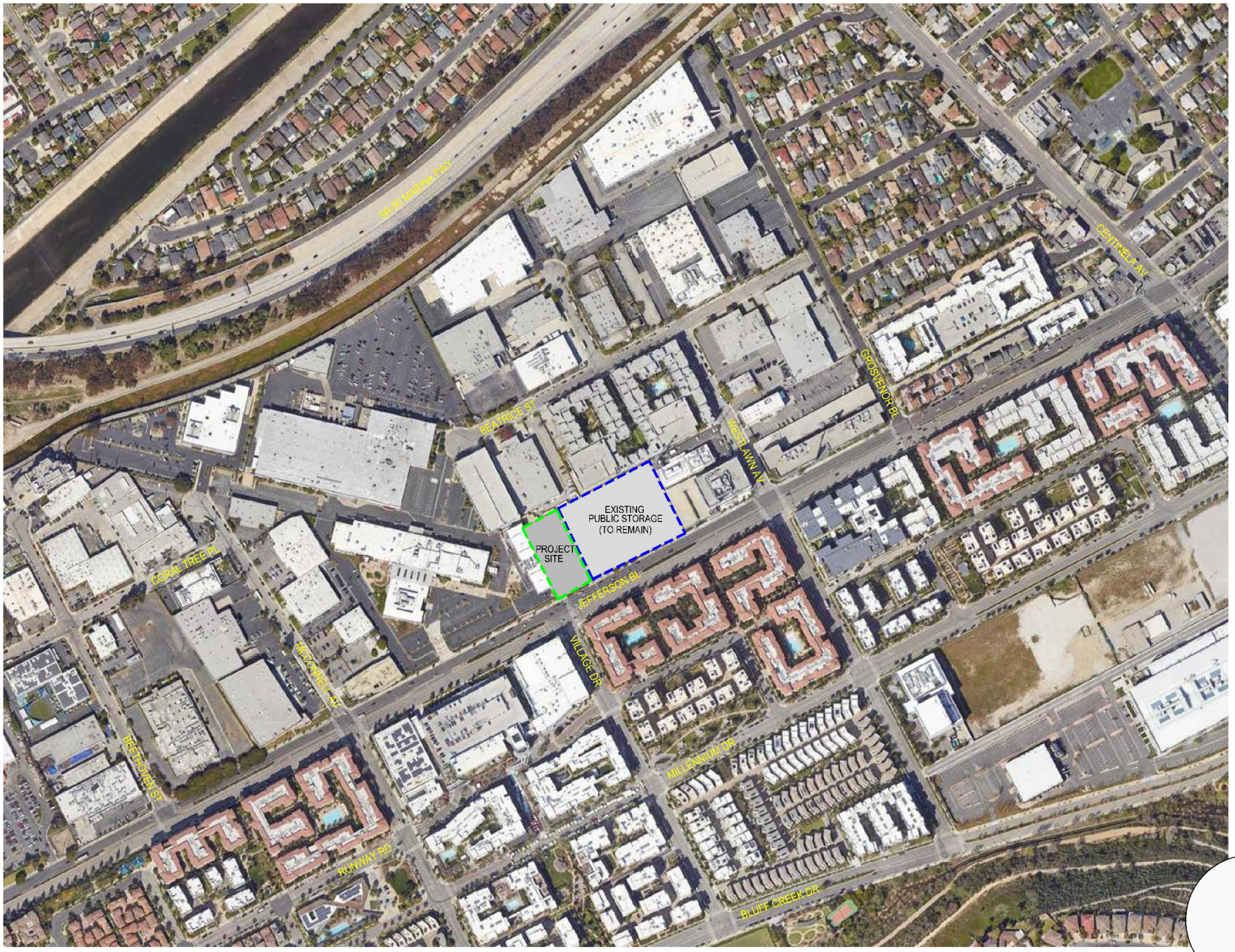
The Project Site is located within the Palms - Mar Vista - Del Rey Community Plan Area of Council District 11 and the Coastal Transportation Corridor Specific Plan (CTCSP). Regional vehicular access to the Project Site is provided by the I-405 San Diego Freeway and the SR-90 Marina Freeway. Major arterials serving the Project Site include Jefferson Boulevard and Centinela Avenue. Local-serving streets surrounding the Project Site include Campus Center Drive, McConnell Avenue, Village Drive and Westlawn Avenue.

The existing site is currently developed with a four-story, mini-warehouse building (Public Storage) containing a total of 216,584 square feet. A driveway located along Jefferson Boulevard currently provides vehicular access (inbound and outbound) to the existing Public Storage building.

Existing Transit Serving Project Site

Four bus lines currently serve the vicinity of the Project site. One bus line (Line 110) is operated by the Los Angeles County Metropolitan Transportation Authority (MTA/METRO), one bus line (Commuter Express 437B) is operated by the Los Angeles Department of Transportation (LADOT), one bus line (Line 4) is operated by the Culver City Bus (CC), and one bus line (Daily Shuttle) is operated by Playa Vista (PV). Bus stops are located at the corners of the intersection of McConnell Avenue / Jefferson Boulevard that serve Metro 110, LADOT CE437B, and CC Line 4.

Bus stops are located at the corners of the intersection of Westlawn Avenue / Jefferson Boulevard that serve Metro 110, LADOT CE437B, and CC Line 4. Bus stops are also located at the corners of the intersection of Village Drive / Millennium Drive that serve PV Daily Shuttle.



Map Source: Google Maps

FIGURE 1
LOCATION OF PROJECT SITE

RAJU Associates, Inc.



Map Source: Google Maps

N
Not to scale

FIGURE 2
EXISTING PROJECT SITE

RAJU Associates, Inc.

PROJECT DESCRIPTION

The existing site contains a four-story, mini-warehouse building with approximately 216,584 square feet. The proposed Project consists of constructing a new 84,752 gross square-foot mini-warehouse building with approximately 80,614 square feet of storage use (for an overall site total of 297,198 gross square feet of storage use) and 4,138 square feet of ground-floor retail use. The Project would provide a total of 76 vehicle parking spaces and 64 bicycle spaces (32 long-term and 32 short-term spaces). The Project is anticipated to be completed by the Year 2028. The Project ground floor site plan is shown in Figure 3.

Vehicular Access

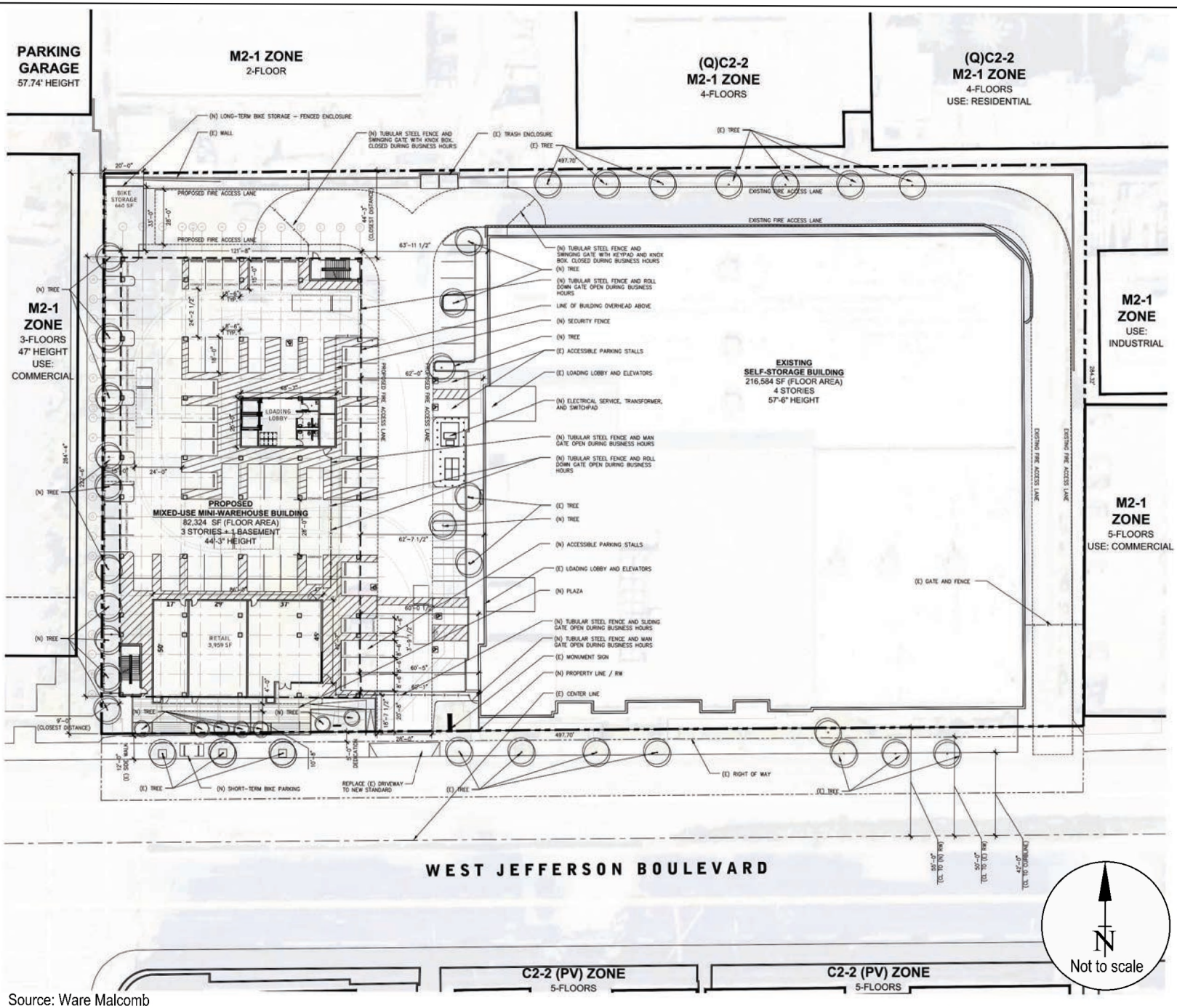
A driveway located along north side of Jefferson Boulevard currently provides access (inbound and outbound) to the existing Public Storage building. The same driveway would also provide access to the proposed Project, as shown in Figure 3.

Pedestrian Access

Jefferson Boulevard would provide the main pedestrian access to the Project site. Sidewalks are available on both sides of Jefferson Boulevard adjacent to and in the vicinity of the Project site. The existing sidewalk/parkway along Jefferson Boulevard adjacent to the Project Site is approximately 12 feet wide. Pedestrian crosswalks adjacent to the Project Site are available at the nearby intersection of Village Drive / Jefferson Boulevard and Westlawn Avenue / Jefferson Boulevard.

Dedication

As indicated in Figure 3, Jefferson Boulevard currently provides a half right-of-way width (north side of street) of 50 feet along the Project's frontage. Per the City of Los Angeles's Bureau of Engineering, the Project is required to provide a 5-foot dedication along the Project's frontage, resulting in a half right-of-way width of 55 feet (for Boulevard II), consistent with the City of Los Angeles' Mobility Plan 2035.



Source: Ware Malcomb

FIGURE 3
PROJECT SITE PLAN - GROUND FLOOR LEVEL

RAJU Associates, Inc.

PROJECT TRIP GENERATION

Per the current *Los Angeles Department of Transportation (LADOT) Transportation Assessment Guidelines*, (TAG) August 2022, "*For the purpose of screening for daily vehicle trips, a proposed prcject's daily vehicle trips should be estimated using the VMT Calculator tool or the most recent edition of the ITE Trip Generation Manual*".

Implementation of the Project consists of constructing a new 84,752 gross square-foot mini-warehouse building with approximately 80,614 square feet of storage use (for an overall site total of 297,198 gross square feet of storage use) and 4,138 square feet of ground-floor retail use. The existing site contains a four-story, mini-warehouse building with approximately 216,584 square feet which will remain.

The Institute of Transportation Engineers (ITE) Trip Generation Manual, 11th Edition (ITE, 2021) was utilized to determine the Project's net daily trips and peak hour trip generation using the ITE's trip generation rates. Table 1 presents details of the Project's trip generation including type of use, size, applicable rate and trip generation estimates. Other calculations within the tables also provide for trip generation reductions from transit trips, pass-by trips, and existing use trips per LADOT's Transportation Assessment Guidelines.

From Table 1, it can be observed that the proposed Project's trip generation would result in an additional net total of approximately 218 daily trips of which 12 trips would occur during the morning peak hour and 25 trips during the evening peak hour.

Project Trip Generation for Screening Purposes

Per LADOT's TAG, *"For mixed-use prcjects, daily trips associated with local serving retail use of the prcject can be removed in determining if the prcject's daily vehicle trips are calculated for screening purposes"*. Retail projects that are under 50,000 square feet are considered local serving (i.e., vehicle trips originate from the project area). As stated above, the Project consists of constructing a new 84,752 square-foot mini-warehouse building with approximately 80,614 square feet of storage use (for an overall site total of 297,198 square feet of storage use) and 4,138 square feet of ground-floor retail use. The Project's retail component is under 50,000 square feet

TABLE 1
ESTIMATED PROJECT TRIP GENERATION

	Size	Daily	AM Peak Hour			PM Peak Hour		
			IN	OUT	TOTAL	IN	OUT	TOTAL
Proposed Project (Existing + Proposed)								
Mini-Warehouse	297,198 s.f.	431	16	11	27	21	24	45
Retail	4,138 s.f.	225	6	4	10	14	13	27
Retail - Transit Trip Credit (10%)		(23)	(1)	0	(1)	(1)	(1)	(2)
Retail - Pass-By Trip Credit (50%)		(101)	(3)	(2)	(5)	(7)	(6)	(13)
Existing Uses (to remain) [1]								
Mini-Warehouse	(216,584) s.f.	(314)	(11)	(8)	(19)	(15)	(17)	(32)
Project Net Trip Generation Total		**218**	**7**	**5**	**12**	**12**	**13**	**25**
Trip Rates [2]								
Mini-Warehouse (ITE Land Use 151)	Trips per 1,000 s.f.	1.45	59%	41%	0.09	47%	53%	0.15
Retail <40 ksf (ITE Land Use 822)	Trips per 1,000 s.f.	54.45	60%	40%	2.36	50%	50%	6.59

* Pass-by trips determined after reduction of transit trips.

[1] Based on the guidelines set forth in LADOT's transportation assessment guidelines, an existing use trip generation credit may be applied to a project to account for the vehicle trips generated by the existing use(s) if the existing use has been occupied for at least six consecutive months within the past two years. As the existing use on-site is currently occupied and operational, a trip generation credit for the existing use is appropriate for purposes of forecasting the net new project trip generation.

[2] Trip Generation Manual, 11th Edition, ITE 2021.

and therefore, considered local serving. Table 2 includes a summary of the Project's estimated daily trip generation with the removal of the local serving retail use. As indicated in Table 2, for screening purposes, the Project would result in an additional net total of approximately 117 daily trips based on ITE's Trip Generation Manual, 11th Edition trip generation rates.

Since the LADOT VMT Calculator Tool (v1.4) is based on ITE 9th Edition trip generation rates, the resulting daily trips (based on ITE 11th Edition trip generation rates) for the existing use and proposed use shown in Table 2 were utilized in the LADOT VMT Calculator Tool using the custom land use feature. As indicated in the LADOT VMT Screening Criteria section (included in Attachment B), the Project would result in a net total of approximately 101 daily trips.

CITY OF LOS ANGELES TRANSPORTATION ASSESSMENT SCREENING

Per the current LADOT TAG, the City requires the preparation and submission of a transportation assessment for Development Projects that meet the following criteria:

- If the Development Project is estimated to generate a net increase of 250 or more daily vehicle trips and requires discretionary action, a transportation assessment for a Development Project is required.
- A transportation assessment is required by City ordinance or regulation.

The Project is estimated to result in total trip generation of 101 net daily trips. Therefore, per City's TAG, the Project's estimated trip generation does not meet or exceed the City's screening criteria for preparing a transportation assessment. Additionally, no City ordinance or regulations have been identified that require a transportation assessment for this Project. Therefore, no further analysis is needed for the proposed Project.

TABLE 2
ESTIMATED PROJECT TRIP GENERATION - FOR SCREENING PURPOSES

	Size	Daily [2]
Proposed Project (Existing + Proposed)		
Mini-Warehouse	297,198 s.f.	431
Existing Uses (to remain)		
Mini-Warehouse	(216,584) s.f.	(314)
Project Net Total	**80,614 s.f.**	**117**
Project Net Total (from LADOT VMT Calculator v1.4)		**101**
Trip Rates [1]		
Mini-Warehouse (ITE Land Use 151)	Trips per 1,000 s.f.	1.45

[1] Trip Generation Manual, 11th Edition, ITE 2021.

[2] Per LADOT's Transportation Assessment Guidelines, "*For mixed-use projects, daily trips associated with local serving retail use of the project can be removed in determining if the project's daily vehicle trips are calculated for screening purposes*". Accordingly, trips associated with local-serving retail use are not included in this calculation.

*The Project is estimated to generate a net total of 101 daily trips based on LADOT's VMT Calculator Tool (v1.4).

CONCLUSION

The daily volume threshold identified in the LADOT's TAG for requiring preparation of a transportation assessment is 250 or more trips per day. As indicated in Table 2, the Project trip generation is estimated to result in an addition of 101 net daily trips. Therefore, the Project does not exceed the threshold (250 or more daily trips) that require preparation of a transportation assessment per LADOT's *Transportation Assessment Guidelines*. No further transportation (CEQA and non-CEQA) analysis is necessary.

ATTACHMENT A

Da FORM GEN. 160A (Rev. 1/82)

CITY OF LOS ANGELES

INTER-DEPARTMENTAL CORRESPONDENCE

12681 West Jefferson Boulevard
DOT Case No. CTC18-107520

Date: February 1, 2023

To: Brenda Kahinju, Senior Administrative Clerk
Department of City Planning

From: Eduardo Hermoso, Transportation Engineering
Department of Transportation

Subject: **TRAFFIC ASSESSMENT FOR THE PROPOSED PUBLIC STORAGE BUILDING EXPANSION PROJECT LOCATED AT 12681 WEST JEFFERSON BOULEVARD**

The Department of Transportation (LADOT) has completed its review of the technical memorandum, and impact analysis report prepared by Raju Associates, Inc. dated December 6, 2022 with a subsequent revision submitted in January 18, 2023 for the proposed Public Storage expansion project located at 12681 West Jefferson Boulevard. After a review of the pertinent data, DOT has determined that the analysis conducted adequately describes the project-related impact of the proposed development.

In compliance with Senate Bill (SB) 743 and the California Environmental Quality Act (CEQA), a Vehicle Miles Traveled (VMT) analysis is required to identify the project's ability to promote the reduction of green-house gas emissions, the access to diverse land uses, and the development of multi-modal networks. The significance of a project's impact in this regard is measured against the VMT thresholds established in LADOT's Transportation Assessment Guidelines (TAG).

PROJECT DESCRIPTION

The project proposes the construction of a new, 88,688 sq. ft. mini-warehouse building in a vacant lot adjacent to an existing approximately 216,584 sq. ft., four story, Public Storage building. The mini-warehouse space will include 84,729 sq. ft. of storage use (for an overall site total of 303,313 sq. ft. of storage use) and 3,959 sq. ft. of ground-floor retail use. The project is anticipated to be completed in 2026.

The site is located on the north side of Jefferson Boulevard between Westlawn Avenue and Village Drive in the Playa Vista area and is currently occupied by the Public Storage facility and the adjacent vacant lot. Access to the project site is proposed from an existing driveway on the north side of Jefferson Boulevard. The existing driveway already provides right-in and right-out access to the existing Public Storage facility and is intended to keep the same operation after the project is completed.

A total of 75 vehicle parking spaces and 64 bicycle spaces would be provided per the Los Angeles Municipal Code (LAMC) including 32 short-term and 32 long-term bicycle parking spaces.

DISCUSSION AND FINDINGS

Trip Generation

The applicant conducted a conservative trip generation analysis by utilizing both LADOT's VMT

Calculator Tool and the Institute of Transportation Engineers (ITE) Trip Generation 11th Edition, 2021 to determine if the project would exceed the net 250 daily vehicle trips threshold requiring further transportation analysis. Since the LADOT VMT Calculator Tool (v1.3) is based on ITE 9th Edition trip generation rates, the resulting daily trips (based on ITE 11th Edition trip generation rates) for the existing use and proposed use were utilized in the LADOT VMT Calculator Tool using the custom land use feature. As indicated the LADOT VMT Screening Criteria section (included in **Attachment A**), the Project would result in a net total of approximately 105 daily trips. The project is estimated to generate a net increase of 123 daily trips, using the rates published in the ITE 11th Edition. A copy of the trip generation table (Table 2) can be found in **Attachment "B"**.

Traffic Impact

LADOT concurs with the conclusion of the transportation analysis that the project trip generation does not meet the trip threshold to require a traffic impact analysis. Therefore, LADOT will not require the preparation of a traffic impact analysis for this project.

PROJECT REQUIREMENTS

To comply with transportation and mobility goals and provisions of adopted City Plans and ordinances, the applicant should be required to implement the following:

1. **Transportation Impact Assessment (TIA) Fee:**

   Pursuant to Section 1.D.2 of the Fee Ordinance No. 186105 as authorized by the Coastal Transportation Corridor Specific Plan (CTC SP) an applicant for a project within the Specific Plan area, except as exempted, shall pay, or guarantee payment of a TIA Fee prior to issuance of any building permit. Applicable fee rates are identified in the TIA Fee Table of the Fee Ordinance. The applicable fee for the proposed project has been determined as follows:

   Land Uses/ TIA fee Rates:
   Industrial Land Use + Retail & Service Land Use

   Proposed Uses:
   Mini-Warehouse: (84,729 sq. ft.) * ($4,028/1,000 sq. ft.) = **$341,288.41**
   Retail: (3,959 sq. ft.) * ($16,016/1,000 sq. ft.) = **$63,407.34**

   TOTAL TIA fee = $404,695.75

   Pursuant to Section 1.C.4 of the Fee Ordinance No. 186105 as authorized by the CTC SP, the Transportation Cost Factor shall be increased (or decreased) as of January 1 of each year by the amount of the percentage increase (or decrease) in the most recently available City Building Code Index, as determined by DOT. Therefore, the actual TIA Fee may vary depending upon when payment is made to DOT.

2. **Highway Dedication and Street Widening Requirements**

   The applicant for the project shall consult the Bureau of Engineering (BOE) for any highway dedication or street widening requirements. These requirements must be guaranteed before the issuance of any building permit through the B-permit process of the BOE. They must be constructed and completed prior to the issuance of any certificate of occupancy to the

satisfaction of DOT and BOE.

3. **Development Review Fees**

   Section 19.15 of the LAMC identifies specific fees for traffic study review, condition clearance, and permit issuance. The applicant shall comply with any applicable fees per this ordinance

4. **Project Access and Circulation**

   The proposed site plan illustrated in **Attachment C** is acceptable to DOT; however, review of the study does not constitute approval of the driveway dimensions and internal circulation schemes. Those will require separate review and approval and should be coordinated with DOT's West LA/Coastal Development Review Section (7166 W Manchester Ave, @ 213-485-1062). In order to minimize potential building design changes, the applicant should contact DOT for driveway width and internal circulation requirements so that such traffic flow considerations are designed and incorporated early into the building and parking layout plans. All truck loading and unloading should take place on site with no vehicles backing into the project from public streets via any of the project driveways.

If you have any questions, please contact Joshua Jones at (213) 485-1062.

Attachments

c: Jeff Khau, Council District No. 11
Milena Zasadzien, William Lamborn, DCP
Tim Fremaux, Rudy Guevara, DOT
Mike Patonai, Oscar Gutierrez BOE
Srinath Raju, Raju Associates, Inc.

Attachment A

CITY OF LOS ANGELES VMT CALCULATOR Version 1.3

Project Screening Criteria: Is this project required to conduct a vehicle miles traveled analysis?

Project Information

Project: Public Storage Expansion Project (12681 W. Jefferson)

Scenario:

Address: 33.97896091660473, -118.41571240479549



Is the project replacing an existing number of residential units with a smaller number of residential units AND is located within one-half mile of a fixed-rail or fixed-guideway transit station?

● Yes ○ No

Existing Land Use

Land Use Type	Value	Unit
Industrial | Warehousing/Self-Storage	216.584	ksf
(custom) Mini-Warehouse (ITE 11th Ed) | Daily	314	Trips
(custom) Mini-Warehouse (ITE 11th Ed) | HBW	19	Percent
(custom) Mini-Warehouse (ITE 11th Ed) | HBO	41	Percent
(custom) Mini-Warehouse (ITE 11th Ed) | NHB	20	Percent
(custom) Mini-Warehouse (ITE 11th Ed) | HBW	0	Percent
(custom) Mini-Warehouse (ITE 11th Ed) | HBO	0	Percent
(custom) Mini-Warehouse (ITE 11th Ed) | NHB	20	Percent
(custom) Mini-Warehouse (ITE 11th Ed) | Daily	0	Residents
(custom) Mini-Warehouse (ITE 11th Ed) | Daily	71	Employees
(custom) Mini-Warehouse (ITE 11th Ed) | Daily	Non-Retai	Retail/Non-R

☑ Click here to add a single custom land use type (will be included in the above list)

Proposed Project Land Use

Land Use Type	Value	Unit
Industrial | Warehousing/Self-Storage	303.313	ksf
(custom) Mini-Warehouse (11th Ed) | Retail/No	Non-Retai	LU type
(custom) Mini-Warehouse (11th Ed) | Residen	0	Person
(custom) Mini-Warehouse (11th Ed) | Employe	99	Person
(custom) Mini-Warehouse (11th Ed) | Daily	437	Trips
(custom) Mini-Warehouse (11th Ed) | HBW-Att	19	Percent
(custom) Mini-Warehouse (11th Ed) | HBO-Att	41	Percent
(custom) Mini-Warehouse (11th Ed) | NHB-Attr	20	Percent
(custom) Mini-Warehouse (11th Ed) | HBW-Pro	0	Percent
(custom) Mini-Warehouse (11th Ed) | HBO-Pro	0	Percent
(custom) Mini-Warehouse (11th Ed) | NHB-Pro	20	Percent

☑ Click here to add a single custom land use type (will be included in the above list)

Project Screening Summary

Existing Land Use	Proposed Project
281 Daily Vehicle Trips	386 Daily Vehicle Trips
2,216 Daily VMT	3,042 Daily VMT

Tier 1 Screening Criteria

Project will have less residential units compared to existing residential units & is within one-half mile of a fixed-rail station. ☐

Tier 2 Screening Criteria

The net increase in daily trips < 250 trips	105 Net Daily Trips
The net increase in daily VMT ≤ 0	826 Net Daily VMT
The proposed project consists of only retail land uses ≤ 50,000 square feet total.	0.000 ksf

The proposed project is not required to perform VMT analysis.

Measuring the Miles

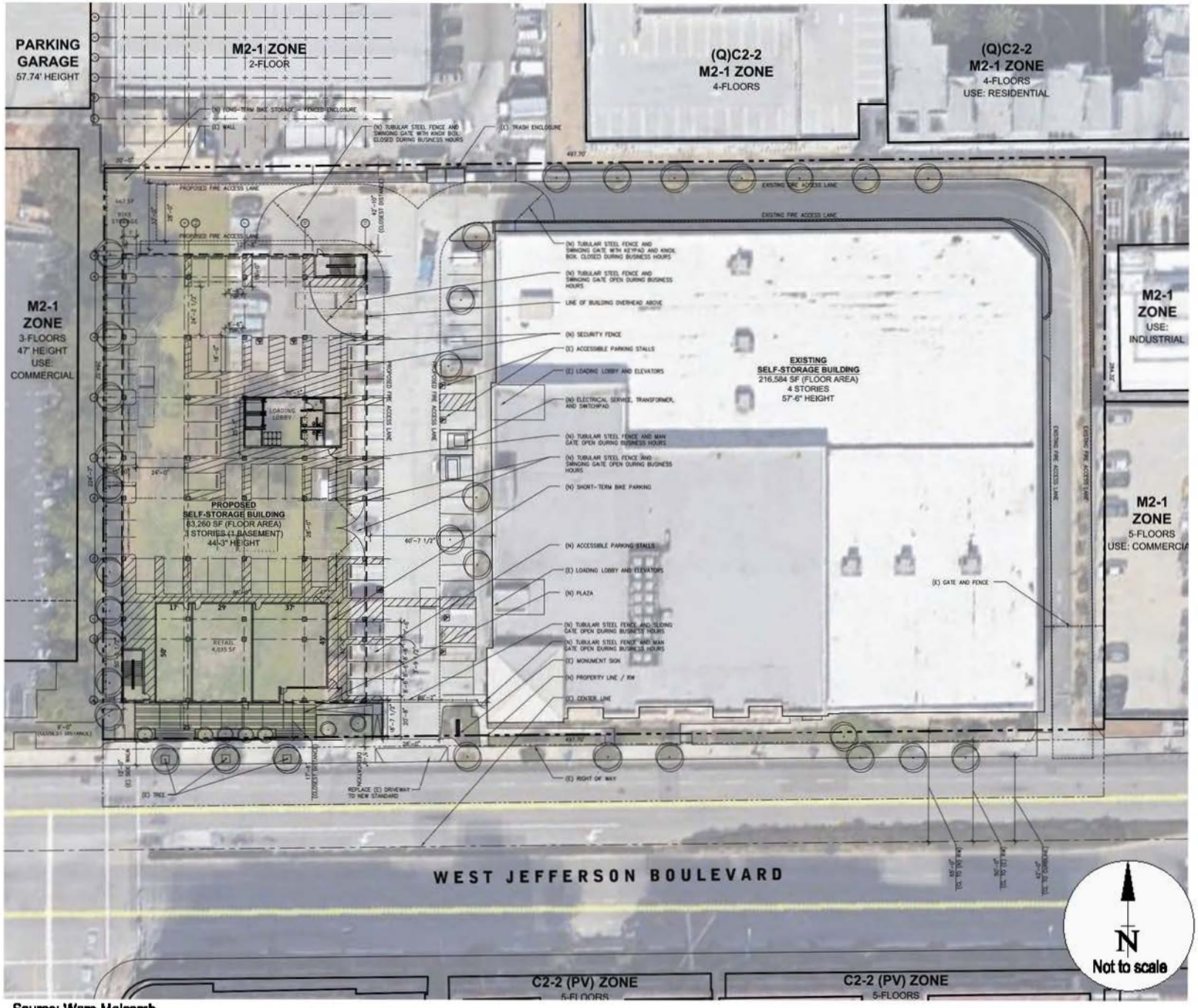
TABLE 2
ESTIMATED PROJECT TRIP GENERATION - FOR SCREENING PURPOSES

	Size	Daily [2]
Proposed Project (Existing + Proposed)		
Mini-Warehouse	301,313 s.f.	437
Existing Uses (to be remain)		
Mini-Warehouse	(216,584) s.f.	(314)
Project Net Total	**84,729 s.f.**	**123**
Trip Rates [1]		
Mini-Warehouse (ITE Land Use 151)	Trips per 1,000 s.f.	1.45

[1] Trip Generation Manual, 11th Edition, ITE 2021.

[2] Per LADOT's Transportation Assessment Guidelines, "*For mixed-use projects, daily trips associated with local serving retail use of the project can be removed in determining if the project's daily vehicle trips are calculated for screening purposes*". Accordingly, trips associated with local-serving retail use are not included in this calculation.

*The Project is estimated to generate a net total of 105 daily trips based on LADOT's VMT Calculator Tool (v1.3).



Source: Ware Malcomb

FIGURE 3
PROJECT SITE PLAN - GROUND FLOOR LEVEL

RAJU Associates, Inc.

ATTACHMENT B

CITY OF LOS ANGELES VMT CALCULATOR Version 1.4

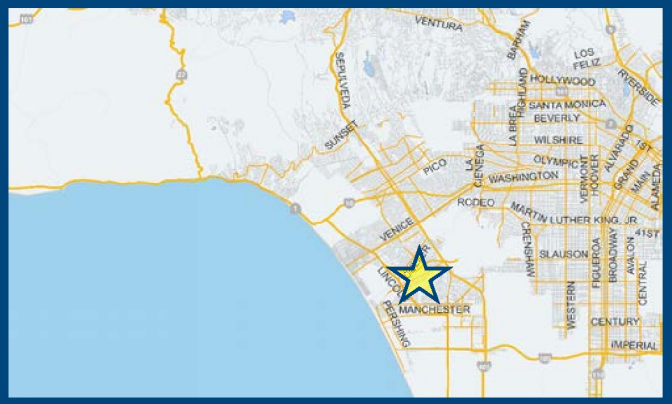
Project Screening Criteria: Is this project required to conduct a vehicle miles traveled analysis?

Project Information

Project: Public Storage Expansion Project (12681 W.Jefferson)

Scenario:

Address: 12681 W JEFFERSON BLVD, 90066



Is the project replacing an existing number of residential units with a smaller number of residential units AND is located within one-half mile of a fixed-rail or fixed-guideway transit station?

○ Yes ○ No

Existing Land Use

Land Use Type	Value	Unit
Industrial | Warehousing/Self-Storage	216.584	ksf
(custom) Mini-Warehouse (ITE 11th Ed) | Daily	314	Trips
(custom) Mini-Warehouse (ITE 11th Ed) | HBW	19	Percent
(custom) Mini-Warehouse (ITE 11th Ed) | HBO	41	Percent
(custom) Mini-Warehouse (ITE 11th Ed) | NHB	20	Percent
(custom) Mini-Warehouse (ITE 11th Ed) | HBW	0	Percent
(custom) Mini-Warehouse (ITE 11th Ed) | HBO	0	Percent
(custom) Mini-Warehouse (ITE 11th Ed) | NHB	20	Percent
(custom) Mini-Warehouse (ITE 11th Ed) | Daily	0	Residents
(custom) Mini-Warehouse (ITE 11th Ed) | Daily	71	Employees
(custom) Mini-Warehouse (ITE 11th Ed) | Daily	Non-Retai	Retail/Non-R

☑ Click here to add a single custom land use type (will be included in the above list)

Proposed Project Land Use

Land Use Type	Value	Unit
Industrial | Warehousing/Self-Storage	297.198	ksf
(custom) Mini-Warehouse (ITE 11th Ed) | Daily	431	Trips
(custom) Mini-Warehouse (ITE 11th Ed) | HBW	19	Percent
(custom) Mini-Warehouse (ITE 11th Ed) | HBO	41	Percent
(custom) Mini-Warehouse (ITE 11th Ed) | NHB	20	Percent
(custom) Mini-Warehouse (ITE 11th Ed) | HBW	0	Percent
(custom) Mini-Warehouse (ITE 11th Ed) | HBO	0	Percent
(custom) Mini-Warehouse (ITE 11th Ed) | NHB	20	Percent
(custom) Mini-Warehouse (ITE 11th Ed) | Daily	0	Residents
(custom) Mini-Warehouse (ITE 11th Ed) | Daily	98	Employees
(custom) Mini-Warehouse (ITE 11th Ed) | Daily	Non-Retai	Retail/Non-R

☑ Click here to add a single custom land use type (will be included in the above list)

Project Screening Summary

Existing Land Use	Proposed Project
281 Daily Vehicle Trips	382 Daily Vehicle Trips
2,216 Daily VMT	3,012 Daily VMT

Tier 1 Screening Criteria

Project will have less residential units compared to existing residential units & is within one-half mile of a fixed-rail station. ☐

Tier 2 Screening Criteria

The net increase in daily trips < 250 trips	101 Net Daily Trips
The net increase in daily VMT ≤ 0	796 Net Daily VMT
The proposed project consists of only retail land uses ≤ 50,000 square feet total.	0.000 ksf

The proposed project is not required to perform VMT analysis.

Measuring the Miles

1/30/2024

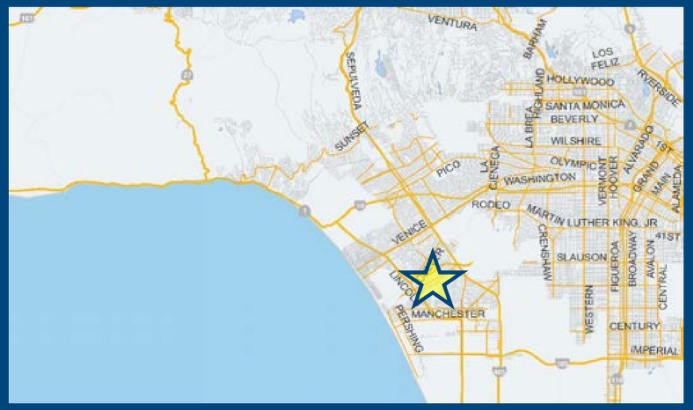
CITY OF LOS ANGELES VMT CALCULATOR Version 1.4

Project Information

Project: Public Storage Expansion Project (12681 W.Jefferson)

Scenario:

Address: 12681 W JEFFERSON BLVD, 90066



Proposed Project Land Use Type	Value	Unit
(custom) Mini-Warehouse (ITE 11th Ed) | Daily	431	Trips
(custom) Mini-Warehouse (ITE 11th Ed) | HBW	19	Percent
(custom) Mini-Warehouse (ITE 11th Ed) | HBO	41	Percent
(custom) Mini-Warehouse (ITE 11th Ed) | NHB	20	Percent
(custom) Mini-Warehouse (ITE 11th Ed) | HBW	0	Percent
(custom) Mini-Warehouse (ITE 11th Ed) | HBO	0	Percent
(custom) Mini-Warehouse (ITE 11th Ed) | NHB	20	Percent
(custom) Mini-Warehouse (ITE 11th Ed) | Daily	0	Residents
(custom) Mini-Warehouse (ITE 11th Ed) | Daily	98	Employees
(custom) Mini-Warehouse (ITE 11th Ed) | Daily	Non-Retai	Retail/Non-R

TDM Strategies

Select each section to show individual strategies
Use ☑ to denote if the TDM strategy is part of the proposed project or is a mitigation strategy

	Proposed Project	With Mitigation
Max Home Based TDM Achieved?	**No**	**No**
Max Work Based TDM Achieved?	**No**	**No**

A Parking

Reduce Parking Supply ☐ Proposed Prj ☐ Mitigation
- city code parking provision for the project site
- actual parking provision for the project site

Unbundle Parking ☐ Proposed Prj ☐ Mitigation
- monthly parking cost (dollar) for the project site

Parking Cash-Out ☐ Proposed Prj ☐ Mitigation
- percent of employees eligible

Price Workplace Parking ☐ Proposed Prj ☐ Mitigation
- 6.00 daily parking charge (dollar)
- percent of employees subject to priced parking

Residential Area Parking Permits ☐ Proposed Prj ☐ Mitigation
- 200 cost (dollar) of annual permit

B Transit

C Education & Encouragement

D Commute Trip Reductions

E Shared Mobility

F Bicycle Infrastructure

G Neighborhood Enhancement

Analysis Results

Proposed Project	With Mitigation
382 Daily Vehicle Trips	**382** Daily Vehicle Trips
3,012 Daily VMT	**3,012** Daily VMT
N/A Household VMT per Capita	**N/A** Household VMT per Capita
N/A Work VMT per Employee	**N/A** Work VMT per Employee

Significant VMT Impact?

Proposed Project	With Mitigation
Household: N/A Threshold = 7.4 15% Below APC	**Household: N/A** Threshold = 7.4 15% Below APC
Work: N/A Threshold = 11.1 15% Below APC	**Work: N/A** Threshold = 11.1 15% Below APC

Measuring the Miles

1/30/2024

CITY OF LOS ANGELES VMT CALCULATOR

Report 1: Project & Analysis Overview

Date: January 30, 2024
Project Name: Public Storage Expansion Project (12681
Project Scenario:
Project Address: 12681 W JEFFERSON BLVD, 90066

Version 1.4

Project Information			
Land Use Type		**Value**	**Units**
Housing	*Single Family*	*0*	*DU*
	Multi Family	*0*	*DU*
	Townhouse	*0*	*DU*
	Hotel	*0*	*Rooms*
	Motel	*0*	*Rooms*
Affordable Housing	*Family*	*0*	*DU*
	Senior	*0*	*DU*
	Special Needs	*0*	*DU*
	Permanent Supportive	*0*	*DU*
Retail	*General Retail*	*0.000*	*ksf*
	Furniture Store	*0.000*	*ksf*
	Pharmacy/Drugstore	*0.000*	*ksf*
	Supermarket	*0.000*	*ksf*
	Bank	*0.000*	*ksf*
	Health Club	*0.000*	*ksf*
	High-Turnover Sit-Down Restaurant	*0.000*	*ksf*
	Fast-Food Restaurant	*0.000*	*ksf*
	Quality Restaurant	*0.000*	*ksf*
	Auto Repair	*0.000*	*ksf*
	Home Improvement	*0.000*	*ksf*
	Free-Standing Discount	*0.000*	*ksf*
	Movie Theater	*0*	*Seats*
Office	*General Office*	*0.000*	*ksf*
	Medical Office	*0.000*	*ksf*
Industrial	*Light Industrial*	*0.000*	*ksf*
	Manufacturing	*0.000*	*ksf*
	Warehousing/Self-Storage	*0.000*	*ksf*
School	*University*	*0*	*Students*
	High School	*0*	*Students*
	Middle School	*0*	*Students*
	Elementary	*0*	*Students*
	Private School (K-12)	*0*	*Students*
Other	Mini-Warehouse (ITE 11th Ed)	431	Trips

CITY OF LOS ANGELES VMT CALCULATOR

Report 1: Project & Analysis Overview

Date: January 30, 2024
Project Name: Public Storage Expansion Project (12681
Project Scenario:
Project Address: 12681 W JEFFERSON BLVD, 90066

Version 1.4

Analysis Results			
Total Employees: 98 Total Population: 0			
Proposed Project		***With Mitigation***	
382	**Daily Vehicle Trips**	**382**	**Daily Vehicle Trips**
3,012	**Daily VMT**	**3,012**	**Daily VMT**
N/A	**Household VMT per Capita**	**N/A**	**Household VMT per Capita**
N/A	**Work VMT per Employee**	**N/A**	**Work VMT per Employee**
Significant VMT Impact?			
APC: West Los Angeles			
Impact Threshold: 15% Below APC Average Household = 7.4 Work = 11.1			
Proposed Project		***With Mitigation***	
VMT Threshold	**Impact**	**VMT Threshold**	**Impact**
Household > 7.4	N/A	Household > 7.4	N/A
Work > 11.1	N/A	Work > 11.1	N/A

TDM Strategy Inputs

Strategy Type		Description	Proposed Project	Mitigations
Parking	*Reduce parking supply*	*City code parking provision (spaces)*	*0*	*0*
		Actual parking provision (spaces)	*0*	*0*
	Unbundle parking	*Monthly cost for parking ($)*	*$0*	*$0*
	Parking cash-out	*Employees eligible (%)*	*0%*	*0%*
	Price workplace parking	*Daily parking charge ($)*	*$0.00*	*$0.00*
		Employees subject to priced parking (%)	*0%*	*0%*
	Residential area parking permits	*Cost of annual permit ($)*	*$0*	*$0*

(cont. on following page)

TDM Strategy Inputs, Cont.

Strategy Type		Description	Proposed Project	Mitigations
Transit	Reduce transit headways	Reduction in headways (increase in frequency) (%)	0%	0%
		Existing transit mode share (as a percent of total daily trips) (%)	0%	0%
		Lines within project site improved (<50%, >=50%)	0	0
	Implement neighborhood shuttle	Degree of implementation (low, medium, high)	0	0
		Employees and residents eligible (%)	0%	0%
	Transit subsidies	Employees and residents eligible (%)	0%	0%
		Amount of transit subsidy per passenger (daily equivalent) ($)	$0.00	$0.00
Education & Encouragement	Voluntary travel behavior change program	Employees and residents participating (%)	0%	0%
	Promotions and marketing	Employees and residents participating (%)	0%	0%

(cont. on following page)

TDM Strategy Inputs, Cont.

Strategy Type		Description	Proposed Project	Mitigations
Commute Trip Reductions	*Required commute trip reduction program*	*Employees participating (%)*	*0%*	*0%*
	Alternative Work Schedules and Telecommute	*Employees participating (%)*	*0%*	*0%*
		Type of program	*0*	*0*
		Degree of implementation (low, medium, high)	*0*	*0*
	Employer sponsored vanpool or shuttle	*Employees eligible (%)*	*0%*	*0%*
		Employer size (small, medium, large)	*0*	*0*
	Ride-share program	*Employees eligible (%)*	*0%*	*0%*
Shared Mobility	*Car share*	*Car share project setting (Urban, Suburban, All Other)*	*0*	*0*
	Bike share	*Within 600 feet of existing bike share station - OR- implementing new bike share station (Yes/No)*	*0*	*0*
	School carpool program	*Level of implementation (Low, Medium, High)*	*0*	*0*

(cont. on following page)

TDM Strategy Inputs, Cont.

Strategy Type		Description	Proposed Project	Mitigations
Bicycle Infrastructure	*Implement/Improve on-street bicycle facility*	*Provide bicycle facility along site (Yes/No)*	*0*	*0*
	Include Bike parking per LAMC	*Meets City Bike Parking Code (Yes/No)*	*0*	*0*
	Include secure bike parking and showers	*Includes indoor bike parking/lockers, showers, & repair station (Yes/No)*	*0*	*0*
Neighborhood Enhancement	*Traffic calming improvements*	*Streets with traffic calming improvements (%)*	*0%*	*0%*
		Intersections with traffic calming improvements (%)	*0%*	*0%*
	Pedestrian network improvements	*Included (within project and connecting off-site/within project only)*	*0*	*0*

CITY OF LOS ANGELES VMT CALCULATOR

Report 3: TDM Outputs

Date: January 30, 2024
Project Name: Public Storage Expansion Project (12681 W.Jefferson)
Project Scenario:
Project Address: 12681 W JEFFERSON BLVD, 90066

Version 1.4

TDM Adjustments by Trip Purpose & Strategy

Place type: Suburban Center

		Home Based Work Production		*Home Based Work Attraction*		*Home Based Other Production*		*Home Based Other Attraction*		*Non-Home Based Other Production*		*Non-Home Based Other Attraction*		*Source*
		Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	
Parking	Reduce parking supply	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	TDM Strategy Appendix, Parking sections 1 - 5
	Unbundle parking	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
	Parking cash-out	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
	Price workplace parking	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
	Residential area parking permits	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
Transit	Reduce transit headways	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	TDM Strategy Appendix, Transit sections 1 - 3
	Implement neighborhood shuttle	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
	Transit subsidies	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Education & Encouragement	Voluntary travel behavior change program	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	TDM Strategy Appendix, Education & Encouragement sections 1 - 2
	Promotions and marketing	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Commute Trip Reductions	Required commute trip reduction program	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	TDM Strategy Appendix, Commute Trip Reductions sections 1 - 4
	Alternative Work Schedules and Telecommute Program	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
	Employer sponsored vanpool or shuttle	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
	Ride-share program	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Shared Mobility	Car-share	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	TDM Strategy Appendix, Shared Mobility sections 1 - 3
	Bike share	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
	School carpool program	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	

TDM Adjustments by Trip Purpose & Strategy, Cont.

Place type: Suburban Center

		Home Based Work Production		*Home Based Work Attraction*		*Home Based Other Production*		*Home Based Other Attraction*		*Non-Home Based Other Production*		*Non-Home Based Other Attraction*		*Source*
		Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	
Bicycle Infrastructure	Implement/ Improve on-street bicycle facility	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	TDM Strategy Appendix, Bicycle Infrastructure sections 1 - 3
	Include Bike parking per LAMC	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	
	Include secure bike parking and showers	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	
Neighborhood Enhancement	Traffic calming improvements	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	TDM Strategy Appendix, Neighborhood Enhancement sections 1 - 2
	Pedestrian network improvements	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	

Final Combined & Maximum TDM Effect

	Home Based Work Production		*Home Based Work Attraction*		*Home Based Other Production*		*Home Based Other Attraction*		*Non-Home Based Other Production*		*Non-Home Based Other Attraction*	
	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated
COMBINED TOTAL	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*
MAX. TDM EFFECT	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*

= Minimum (X%, 1-[(1-A)*(1-B)…])

where X%=

PLACE TYPE MAX:	*urban*	*75%*
	compact infill	*40%*
	suburban center	*20%*
	suburban	*15%*

Note: (1-[(1-A)*(1-B)…]) reflects the dampened combined effectiveness of TDM Strategies (e.g., A, B,…). See the TDM Strategy Appendix (*Transportation Assessment Guidelines Attachment G)* for further discussion of dampening.

CITY OF LOS ANGELES VMT CALCULATOR

Report 4: MXD Methodology

Date: January 30, 2024
Project Name: Public Storage Expansion Project (12681
Project Scenario:
Project Address: 12681 W JEFFERSON BLVD, 90066

Version 1.4

MXD Methodology - Project Without TDM

	Unadjusted Trips	MXD Adjustment	MXD Trips	Average Trip Length	Unadjusted VMT	MXD VMT
Home Based Work Production	0	0.0%	0	7.9	0	0
Home Based Other Production	0	0.0%	0	5.7	0	0
Non-Home Based Other Production	86	-1.2%	85	7.3	628	621
Home-Based Work Attraction	82	-8.5%	75	9.9	812	743
Home-Based Other Attraction	177	-22.6%	137	6.5	1,151	891
Non-Home Based Other Attraction	86	-1.2%	85	8.9	765	757

MXD Methodology with TDM Measures

	Proposed Project			*Project with Mitigation Measures*		
	TDM Adjustment	Project Trips	Project VMT	TDM Adjustment	Mitigated Trips	Mitigated VMT
Home Based Work Production	0.0%	0	0	0.0%	0	0
Home Based Other Production	0.0%	0	0	0.0%	0	0
Non-Home Based Other Production	0.0%	85	621	0.0%	85	621
Home-Based Work Attraction	0.0%	75	743	0.0%	75	743
Home-Based Other Attraction	0.0%	137	891	0.0%	137	891
Non-Home Based Other Attraction	0.0%	85	757	0.0%	85	757

MXD VMT Methodology Per Capita & Per Employee

Total Population: 0
Total Employees: 98
APC: West Los Angeles

	Proposed Project	*Project with Mitigation Measures*
Total Home Based Production VMT	**0**	**0**
Total Home Based Work Attraction VMT	**743**	**743**
Total Home Based VMT Per Capita	**N/A**	**N/A**
Total Work Based VMT Per Employee	**N/A**	**N/A**

EXHIBIT E

ENVIRONMENTAL DOCUMENTS

E.2 – ENV-2024-116-MND Mitigation Monitoring Program

CPC-2024-115-GPA-ZC-HD-CU-ZAA-SPR

MITIGATION AND MONITORING PROGRAM

1.1 INTRODUCTION

This Mitigation Monitoring Program ("MMP") has been prepared pursuant to Public Resources Code Section 21081.6(a)(1), which requires a Lead Agency to adopt a "reporting or monitoring program for changes to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment." In addition, Section 15097(a) of the State CEQA Guidelines requires that a public agency adopt a program for monitoring or reporting mitigation measures and project revisions, which it has required to mitigate or avoid significant environmental effects. This MMP has been prepared in compliance with the requirements of CEQA, Public Resources Code Section 21081.6(a)(1), and Section 15097 of the State CEQA Guidelines.

The City of Los Angeles is the Lead Agency for the Project and therefore is responsible for administering and implementing the MMP. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity that accepts the delegation; however, until mitigation measures have been completed, the Lead Agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program.

A Mitigated Negative Declaration (MND) has been prepared to address the potential environmental impacts of the Project. The evaluation of the Project's impacts in the MND applies mitigation measures (MM) needed to avoid or reduce potentially significant environmental impacts. This MMP is designed to monitor implementation of the MM identified for the Project.

1.2 ORGANIZATION

As shown on the following pages, the identified mitigation measure for the Project is listed and categorized by environmental impact area, with accompanying identification of the following:

- Enforcement Agency: the agency with the power to enforce the MM.
- Monitoring Agency: the agency to which reports involving feasibility, compliance, implementation, and development are made.
- Monitoring Phase: the phase of the Project during which the MM shall be monitored.
- Monitoring Frequency : the frequency at which the MM shall be monitored.
- Action Indicating Compliance: the action by which the Enforcement or Monitoring Agency indicates that compliance with the required MM has been implemented.

1.3 ADMINISTRATIVE PROCEDURES AND ENFORCEMENT

This MMP shall be enforced throughout all phases of the Project. The Applicant shall be responsible for implementing the MM and shall be obligated to provide certification, as identified

below, to the appropriate monitoring and enforcement agencies that the MM has been implemented. The Applicant shall maintain records demonstrating compliance with the MM. Such records shall be made available to the City upon request.

1.4 PROGRAM MODIFICATION

After review and approval of the final MMP by the Lead Agency, minor changes and modifications to the MMP are permitted, but can only be made subject to City approval. The Lead Agency, in conjunction with any appropriate agencies or departments, will determine the adequacy of any proposed change or modification. This flexibility is necessary in light of the nature of the MMP and the need to protect the environment. No changes will be permitted unless the MMP continues to satisfy the requirements of CEQA, as determined by the Lead Agency.

The Project shall be in substantial conformance with the MM contained in this MMP. The enforcing departments or agencies may determine substantial conformance with the MM in the MMP in their reasonable discretion. If the department or agency cannot find substantial conformance, the MM may be modified or deleted as follows: the enforcing department or agency, or the decision maker for a subsequent discretionary project related approval, finds that the modification or deletion complies with CEQA, including CEQA Guidelines Sections 15162 and 15164, which could include the preparation of an addendum or subsequent environmental clearance, if necessary, to analyze the impacts from the modifications to or deletion of the MM. Any addendum or subsequent CEQA clearance shall explain why the MM is no longer needed, not feasible, or the other basis for modifying or deleting the MM, and that the modification will not result in a new significant impact consistent with the requirements of CEQA. Under this process, the modification or deletion of a MM shall not in and of itself require a modification to any Project discretionary approval unless the Director of Planning also finds that the change to the MM results in a substantial change to the Project or the non-environmental conditions of approval.

1.5 MITIGATION MONITORING PROGRAM

A. Tribal Cultural Resources

Mitigation Measure

MM-TRIBAL-1 **Monitor Retention.** Prior to commencing any Ground Disturbance Activities (as defined below) at the Project site, the Applicant, or its successor, shall retain a qualified tribal monitor from and approved by the Gabrieleno Band of Mission Indians – Kizh Nation (Tribe). Ground Disturbance Activities shall include excavating, digging, trenching, grading, or a similar activity at the Project site (i.e., both on-site and any off-site locations that are included in the Project description/definition and/or required in connection with the Project, such as public improvement work). The Applicant, or its successor, and the tribal monitor shall execute a monitoring agreement prior to the earlier of the commencement of any Ground Disturbance Activities, or the issuance of any permit necessary to commence a Ground Disturbance Activity.

WEAP. Prior to commencing any Ground Disturbance Activities, the tribal monitor shall provide Worker Environmental Awareness Program (WEAP) training to construction crews involved in Ground Disturbance Activities that includes information on regulatory requirements for the protection of tribal cultural resources. As part of the WEAP training, construction crews shall be briefed on proper procedures to follow should a crew member discover tribal cultural resources during Ground Disturbance Activities. In addition, workers will be shown examples of the types of resources that would require notification of the tribal monitor. The Applicant shall maintain on the Project site, for potential City inspection, documentation establishing the WEAP training was completed for all members of the construction crew involved in Ground Disturbance Activities.

On-Site Monitoring. The tribal monitor shall observe all Ground Disturbance Activities on the Project site at all times any Ground Disturbance Activities are taking place. If Ground Disturbance Activities are simultaneously occurring at multiple locations on the Project site, the tribal monitor shall determine if additional monitors are required for other locations where such simultaneous Ground Disturbance Activities are occurring. The tribal monitor(s) will complete daily monitoring logs that will provide descriptions and locations of the relevant Ground Disturbance Activities, the type of construction activities performed, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered "tribal cultural resources" as defined in California Public Resources Code Section 21074, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the Applicant and/or the City upon request to the Tribe. If any Project scheduled activities require the tribal monitor(s) to leave the Project site for a period of time and return, confirmation shall be submitted to the Tribe by the Applicant, in writing, upon completion of each set of scheduled activities and five (5) days' notice (if possible) shall be submitted to the Tribe by the Applicant, in writing, prior to the start of each set of scheduled activities. The on-site monitoring shall end when either 1) confirmation is received from the Applicant, in writing, that all scheduled activities pertaining to all Ground Disturbance Activities are completed; or 2) the Tribe provides a determination, in writing, that no future, planned construction activity, and/or development/construction phase at the Project site possesses the potential to impact any tribal cultural resources.

Discovery of Resources. In the event that any objects or artifacts that may be a tribal cultural resource are encountered during the course of any Ground Disturbance Activities, all such activities shall temporarily cease within the area

of discovery, the radius of which shall be at least 25 feet or otherwise determined by the tribal monitor pursuant to the process set forth below:

1. Upon a discovery of a potential tribal cultural resource, the Applicant, or its successor, shall immediately stop all Ground Disturbance Activities in the immediate vicinity of the find (i.e. at least 25 feet or otherwise determined by the tribal monitor) until the find can be assessed by the tribal monitor.

2. If the tribal monitor determines the resources are Native American in origin, the tribal monitor will recommend steps for treatment of all discovered tribal cultural resources such as, but not limited to, the following: statement of the preference for preservation in place (i.e., avoidance) per CEQA Guidelines Section 15126.4(b)(3); description of methods for the adequate recovery of scientifically consequential information; requirements to coordinate with the tribal monitor to ensure that consideration is given to the cultural values ascribed to a resource beyond that which is scientifically important in the event the resource is Native American in origin; and procedures for curating any archaeological materials at a public, non-profit curation facility, university or museum with a research interest in the materials.

3. The Applicant, or its successor, shall implement the Tribe's treatment recommendations if the tribal monitor concludes that the Tribe's recommendations are reasonable and feasible.

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

5. The Applicant, or its successor, may recommence Ground Disturbance Activities within the specified radius of the discovery site, so long as this radius has been reviewed by the tribal monitor and determined to be reasonable and appropriate, and so long as the Applicant has complied with all of the recommendations developed and approved pursuant to the process set forth in Paragraphs 2 through 4 above.

6. Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the City of Los Angeles Department of City Planning, Central Project Planning Division,

the South Central Coastal Information Center (SCCIC) at California State University, Fullerton and to the Native American Heritage Commission for inclusion in its Sacred Lands File.

7. Notwithstanding Paragraph 6 above, any information that Los Angeles Department of City Planning, in consultation with the Los Angeles City Attorney's Office, determines to be confidential in nature shall be excluded from submission to the SCCIC or provided to the public under the applicable provisions of the California Public Records Act, California Public Resources Code (PRC), Section 7927.000, and handled in compliance with the City's AB 52 Confidentiality Protocols.

8. Native American monitoring and excavation during construction projects will be consistent with current professional standards. All feasible care to avoid any unnecessary disturbance, physical modification, or separation of human remains and associated funerary objects shall be taken.

Discovery of Human Remains and Funerary Items. Native American human remains are defined in Public Resources Code (PRC) Section 5097.98(d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, also called associated grave goods in PRC Section 5097.98(a), are also to be treated according to this statute. If Native American human remains and/or grave goods are discovered or recognized on the Project Site, then PRC Sections 5097.9 et seq. as well as Health and Safety Code Section 7050.5 shall be followed. Human remains and grave/burial goods shall be treated alike per PRC section 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.

- **Enforcement Agency:** Department of City Planning
- **Monitoring Agency**: Department of City Planning
- **Monitoring Phase**: Construction
- **Monitoring Frequency**: Periodic field inspection
- **Action Indicating Compliance**: Field inspection sign-off

EXHIBIT E

ENVIRONMENTAL DOCUMENTS

E.3 – ENV-2024-116-MND Agency Comments

CPC-2024-115-GPA-ZC-HD-CU-ZAA-SPR

DEPARTMENT OF TRANSPORTATION
DISTRICT 7
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 269-1124
FAX (213) 897-1337
TTY 711
www.dot.ca.gov

Making Conservation a California Way of Life

June 3, 2025

Kenton Trinh
City of Los Angeles
200 N. Spring Street, Room 721
Los Angeles, CA 90012

RE: Playa Vista Public Storage
Redevelopment Project
SCH # 2025051210
Vic. LA-90, LA-405, LA-01
GTS # LA-2025-04824-MND

Dear Kenton Trinh:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced environmental document. The Project is proposing the construction of a new three-story plus basement mixed-use building with approximately 82,324 square feet of floor area including 3,959 square feet of retail uses and 78,365 square feet of mini warehouse uses with a proposed maximum building height of 44 feet, three inches.

The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Senate Bill 743 (2013) has codified into CEQA law and mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts for all future development projects. As a reminder, all environmental document should include Vehicle Miles Traveled. You may reference the Governor's Office of Planning and Research (OPR) for more information:

https://opr.ca.gov/ceqa/#guidelines-updates

The Project is estimated to result in a net total of approximately 101 daily trips. Based on the results using the City's VMT Calculator, a formal VMT assessment is not required to be performed because the forecast of net new daily vehicle trips does not exceed the daily trip threshold of 250 net new daily vehicle trips established as the screening criteria in the TAG.

Any transportation of heavy construction equipment and/or materials that require the use of oversized transport vehicles on State highways will need a Caltrans transportation permit. Any large-size truck trips be limited to off-peak commute periods for the construction phase and operation phase. Construction truck loads should be covered with a tarpaulin cover.

Storm water run-off is a sensitive issue for Los Angeles County. Please be mindful that projects should be designed to discharge clean run-off water.

If you have any questions, please feel free to contact Mr. Alan Lin, the project coordinator, at (213) 269-1124 and refer to GTS # LA-2025-04824-MND.

Sincerely,

Miya Edmonson

MIYA EDMONSON
LDR/CEQA Branch Chief

email: State Clearinghouse

Department of Toxic Substances Control

Yana Garcia
Secretary for
Environmental Protection

Katherine M. Butler, MPH, Director
8800 Cal Center Drive
Sacramento, California 95826-3200
dtsc.ca.gov

Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

May 28, 2025

Kenton Trinh
City Planner
City of Los Angeles, Department of City Planning
200 N. Spring Street, Room 763
Los Angeles, CA 90012
kenton.trinh@lacity.org

RE: MITIGATED NEGATIVE DECLARATION FOR THE PLAYA VISTA PUBLIC STORAGE REDEVELOPMENT PROJECT DATED MAY 27, 2025, STATE CLEARINGHOUSE NUMBER 2025051210

Dear Kenton Trinh,

The Department of Toxic Substances Control (DTSC) reviewed the Mitigated Negative Declaration (MND) for the Playa Vista Public Storage Redevelopment Project (Project). The Project Site is an approximate 141,627 square-foot partially developed lot with an existing four-story mini-warehouse building consisting of approximately 216,584 square feet of mini warehouse uses and a surface parking lot. The Project proposes the construction of a new three-story plus basement mixed-use building with approximately 82,324 square feet of floor area including 3,959 square feet of retail uses and 78,365 square feet of mini warehouse uses. The Project is proposed on the undeveloped western portion of the site. The construction of the Project would result in approximately 13,541 cubic yards of grading and soil export from the Project Site to a landfill. DTSC recommends and requests consideration of the following comments:

1. If buildings or other structures are to be demolished on any Project sites included in the proposed Project, surveys should be conducted for the

presence of LBPs or products, mercury, ACMs, and polychlorinated biphenyl caulk. Removal, demolition, and disposal of any of the above-mentioned chemicals should be conducted in compliance with California environmental regulations and policies. In addition, sampling near current and/or former buildings should be conducted in accordance with DTSC's Preliminary Endangerment Assessment (PEA) Guidance Manual.

2. DTSC recommends that all imported soil and fill material should be tested to assess any contaminants of concern meet screening levels as outlined in DTSC's PEA Guidance Manual. Additionally, DTSC advises referencing the DTSC Information Advisory Clean Imported Fill Material Fact Sheet if importing fill is necessary. To minimize the possibility of introducing contaminated soil and fill material there should be documentation of the origins of the soil or fill material and, if applicable, sampling be conducted to ensure that the imported soil and fill material are suitable for the intended land use. The soil sampling should include analysis based on the source of the fill and knowledge of prior land use. Additional information can be found by visiting DTSC's Human and Ecological Risk Office (HERO) webpage.

DTSC would like to thank you for the opportunity to comment on the MND for the Playa Vista Public Storage Redevelopment Project. Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions or would like clarification on DTSC's comments, please respond to this letter or via our CEQA Review email for additional guidance.

Sincerely,

Dave Kereazis

Dave Kereazis
Associate Environmental Planner
HWMP-Permitting Division – CEQA Unit
Department of Toxic Substances Control
Dave.Kereazis@dtsc.ca.gov

cc: (via email)

Governor's Office of Land Use and Climate Innovation
State Clearinghouse
State.Clearinghouse@opr.ca.gov

Tamara Purvis
Associate Environmental Planner
HWMP - Permitting Division – CEQA Unit
Department of Toxic Substances Control
Tamara.Purvis@dtsc.ca.gov

Scott Wiley
Associate Governmental Program Analyst
HWMP - Permitting Division – CEQA Unit
Department of Toxic Substances Control
Scott.Wiley@dtsc.ca.gov

EXHIBIT F

PUBLIC CORRESPONDENCE

CPC-2024-115-GPA-ZC-HD-CU-ZAA-SPR

DocuSign Envelope ID: 4051DADB-373E-402A-9E9F-E4D9987A7EB0

Del Rey Residents Association
Since 1972

June 4, 2024

Via E-Mail
See Distribution List below

Re: Citywide Housing Incentive Program

The Community Plan for Palms Mar Vista Del Rey has not been updated since its adoption in 1997. Therefore, until a new plan has been vetted and approved by the City Council, we must insist upon adherence to the land uses and densities in the existing plan.

Specifically, we are concerned that the City's rush to build affordable housing will wipe out the commercial and industrial areas that create jobs for the residents and will result in overly dense projects that do not provide adequate public infrastructure, pollution control and emergency evacuation routes. Del Rey has unique environmental concerns: it is transected by three creeks and two freeways; it has a high water table that will be affected when heavier buildings are built; parts of Del Rey have been identified as flood-prone or at risk due to Sea Level Rise.

Unelected City employees should not have the discretion to grant multiple incentives, waivers and exceptions that will have the effect of upzoning our community before a new comprehensive plan has been adopted.

We are particularly concerned with the following large projects proposed for our area:

1. Paseo Marina. Case #ENV-2016-3343-EIR, State Clearinghouse #2017061017-EIR Paseo Marina, 13400-13450 Maxella Ave, and 4305-4363 Glencoe Ave, Los Angeles, CA 90292. This proposal would require a General Plan Amendment so that a 77 foot tall, predominantly residential complex could be built where there is currently a shopping center that serves the surrounding community.

2. 5000 Beethoven. Case No. CPC-2016-426-GPA-VZC-SPR. Back in 2015, the owner wanted to build 236 apartments on this property which is zoned **Industrial** and is located on a peninsula between Centinela Creek and Ballona Creek, locally known as "Bird Island." In October 2023, the property was advertised as "Industrial/Studio/Office Build-to-Suit." The Coastal Zone boundary bisects the peninsula, which can only be accessed by a two lane bridge. DBS Permit #22020-

Kenton Trinh <kenton.trinh@lacity.org>

Fwd: Public Records Act Request and Request for Mailed Notice of Public Hearings and Actions – Playa Vista Public Storage Redevelopment Project, 12681 W Jefferson Blvd

Beatrice Pacheco <beatrice.pacheco@lacity.org> Tue, Jun 17, 2025 at 12:22 PM
To: Kenton Trinh <kenton.trinh@lacity.org>
Cc: Planning Custodian of Records <planning.custodianofrecords@lacity.org>

Good afternoon, Kenton:

We received the PRA request below and see that you are the assigned Planner.

Can you provide the public records (not emails) responsive to the project mentioned in the request that are on any of the drives in the following share folder by 6/25?

P:\Share\2025 PRA Requests\6.17 ENV-2024-116-MND

Our response is due on 6/27.

Thank you.

Beatrice Pacheco, Chief Clerk
Department of City Planning
T: (213) 847-3732
221 N. Figueroa St., Room 1450
Los Angeles, CA 90012

---------- Forwarded message ---------
From: **Beatrice Pacheco** <beatrice.pacheco@lacity.org>
Date: Tue, Jun 17, 2025 at 12:16 PM
Subject: Re: Public Records Act Request and Request for Mailed Notice of Public Hearings and Actions – Playa Vista Public Storage Redevelopment Project, 12681 W Jefferson Blvd
To: Amy Smith <amy@creedla.com>
Cc: Planning Custodian of Records <planning.custodianofrecords@lacity.org>

Your request was received today, our Dept. will respond accordingly.

Beatrice Pacheco, Chief Clerk
Department of City Planning
T: (213) 847-3732
221 N. Figueroa St., Room 1450
Los Angeles, CA 90012

On Tue, Jun 17, 2025 at 12:15 PM Amy Smith <amy@creedla.com> wrote:

> **RE: Public Records Act Request and Request for Mailed Notice of Public Hearings and Actions – Playa Vista Public Storage Redevelopment Project, 12681 W Jefferson Blvd**

Case Number: ENV-2024-116-MND

To Whom It May Concern,

CREED LA is writing to request a copy of any and all records related to the Playa Vista Public Storage Redevelopment Project located at 12681 W Jefferson Blvd in Los Angeles. The project will be the construction of a new mixed-use building with approximately 82,324 square feet of floor area including 3,959 square feet of retail uses and 78,365 square feet of mini-warehouse uses.

Our request for mailed notice of all hearings includes hearings, study sessions and community meetings related to the Project, certification of the MND (or recirculated DEIR), and approval of any Project entitlements. This request is made pursuant to Public Resources Code Sections 21092.2, 21080.4, 21083.9, 21092, 21108 and 21152 and Government Code Section 65092, which require local agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency's governing body. Our request includes notice to any City actions, hearings or other proceedings regarding the Project, Project approvals and any actions taken, or additional documents released pursuant to the California Environmental Quality Act.

Our request for all records related to the Project is made pursuant to the California Public Records Act. (Government Code § 6250 et seq.) This request is also made pursuant to Article I, section 3(b) of the California Constitution, which provides a constitutional right of access to information concerning the conduct of government. Article I, section 3(b) provides that any statutory right to information shall be broadly construed to provide the greatest access to government information and further requires that any statute that limits the right of access to information shall be narrowly construed.

We will pay for any direct costs of duplication associated with filling this request up to $200. However, please contact me at (877) 810-7473 with a cost estimate before copying/scanning the materials.

Pursuant to Government Code Section 6253.9, if the requested documents are in electronic format and are 10 MB or less (or can be easily broken into sections of 10 MB or less), please email them to me as attachments.

My contact information is:

U.S. Mail

Jeff Modrzejewski

CREED LA

501 Shatto Place, Suite 200

Los Angeles, CA. 90020

Email

creedla@creedla.com

Please call me if you have any questions. Thank you for your assistance with this matter.

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10000-01437; Case: ENV-2023-6735-EAF (private street). The bridge permit was issued without adequate community input and in a way that ignores the potential impacts of the bridge construction on the region's ecosystem and habitat.

3. Culver-Slauson, 11304-11310 and 11312-11314 Culver Boulevard. Culver City is the lead agency for this 143 unit project, which straddles the boundary between Culver City (89 units) and Los Angeles (54 units). The property will be considered a "Transit Oriented Community" because it is within half a mile of the buses on Sepulveda Blvd. and Culver Blvd., but it is also right next to the Sawtelle Avenue onramp to the 405 freeway and the 405 freeway's pollutants. The plan is to build an eight story building with only 10 parking spaces. The units are "all affordable," but 80 per cent of the units will be aimed at "moderate income" residents in small households. Designating the project as "all affordable" will not obviate the need to think about the planning needs of the surrounding community.

4. Public Storage. CPC-2024-115-GPA-ZC-HD-CU-ZAA-SPR, 12681 Jefferson Blvd., proposing a new 82,324 square foot building on a property that has already been built out to the density allowed by our Community Plan. Why should the developer be allowed to build more densely than was previously allowed by the City?

We want to be sure that the City Planning Department will not allow projects to be "super-sized" or be changed in character from what was anticipated when our Community Plan was adopted by the City Council in 1997.

Our board of directors reviewed and approved this e-mail at its June 3, 2024 board meeting.

Very truly yours,

DocuSigned by:
Elizabeth C Layne
B30E294C3EC64EB...

Elizabeth Campos Layne
President

CC: Mayor Karen Bass
- Marian Ensley, West Area Representative, Marian.ensley@lacity.gov

City Councilmember Traci Park,
- Planning Deputy Jeff Khau, jeff.khau@lacity.org
- Del Rey Deputy Matthew Halden, matthew.halden@lacity.org

Polonia.majas@lacity.org re: Paseo Marina
Diego.Janacua@lacity.org re: 5000 Beethoven, Culver-Slauson
Mark.Muenzer@culvercity.org re Culver-Slauson
Kenton.Trinh@lacity.org re Public Storage
Housingelement@lacity.org
Matthew Glesne, Sr. City Planner, Housing Policy, matthew.glesne@lacity.org
Cally Hardy, Sr. Housing Analyst, Housing Department, cally.hardy@lacity.org
Board@delreync.org
Westside Regional Alliance of Councils Land Use & Planning Committee
- Maryam Zar, president@pacpalicc.org

Public Storage

I support the Public Storage redevelopment project at 12681 West Jefferson Blvd. I believe the new facility with ground-floor retail will support the continuing revitalization of our community and West Jefferson Boulevard. We need more local storage options in our community, and this is an ideal location – expanding an existing facility on vacant land. It is difficult to find storage space here, and local residents currently have to drive out of the neighborhood to find available storage options, increasing traffic for all. I urge the City Planning Commission, City Council and Mayor to support and approve this project.

Name	Address	City and zip code	Telephone	E-mail
Sean McBurney	500 Kapalua Dr. Apt. 14T1 Lahaina, Hi	Lahaina, Hi 96761	(213) 219-8938	Sean.mcb72 @gmail.com
Anthony Cooper	8166 manitoba st unit 4	Playa Del Rey, CA 90293	(310) 874-1908	ibcooper27 @gmail.com
Diego Hughes Reyes	3424 S. Centinela Ave Apt 3	Los Angeles CA, 90066	(310) 429-0793	diegohughes19 @gmail.com
Icyva, Alaya	11970 montana AVE Apt. 109 Los Angeles, IA 90049	Los Angeles CA, 90049	(310) 593-3676	alayalevy @yahoo.com
John Guerrero	13816 Bora Bora Way Apt 223	Marina del Rey CA 90292	(818) 929-8659	Johnpguerrero1 @gmail.com

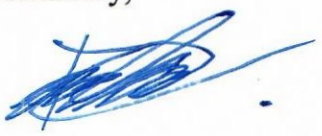
My name is Pedro Hurtado and I am a customer at Public Storage located at 12681 W. Jefferson. I'm writing this letter to express my full support for the proposed new self-storage building currently under review.

As a customer who has used this facility for several years, I have always found it to be professionally operated, secure, and well-maintained. The addition of a new multi-story building, improved landscaping, and modern security features are needed in an area where storage is hard to find. Plus, this is an ideal location – expanding an existing facility on vacant land.

The company's redevelopment approach, while keeping the existing units open, shows a thoughtful and customer-first approach. I believe this additional storage will not only benefit customers like me but will also be a long-term improvement for the community and surrounding neighborhood. Storage is difficult to find in this area, so the project will prevent local residents and businesses from having to drive a long way to rent storage space.

I strongly encourage the City to approve the project and allow Public Storage to expand and continue being a positive presence in this area.

Sincerely,



My name is ANTHONY COOPER and I am a customer at Public Storage located at 12681 W. Jefferson. I'm writing this letter to express my full support for the proposed new self-storage building currently under review.

As a customer who has used this facility for several years, I have always found it to be professionally operated, secure, and well-maintained. The addition of a new multi-story building, improved landscaping, and modern security features are needed in an area where storage is hard to find. Plus, this is an ideal location – expanding an existing facility on vacant land.

The company's redevelopment approach, while keeping the existing units open, shows a thoughtful and customer-first approach. I believe this additional storage will not only benefit customers like me but will also be a long-term improvement for the community and surrounding neighborhood. Storage is difficult to find in this area, so the project will prevent local residents and businesses from having to drive a long way to rent storage space.

I strongly encourage the City to approve the project and allow Public Storage to expand and continue being a positive presence in this area.

Sincerely,

Re: Case No. CPC-2024-115-GPA-ZC-HD-CU-ZAA-SPR

Dear Mr. Trinh,

I am a current customer at the Public Storage at 12681 W. Jefferson Blvd. I'm writing to share my strong support for the approval of the new retail and storage building being proposed at this location.

I think it's a good thing to improve a vacant property, and I'm glad Public Storage is investing in their facility to meet the needs of the community. It is difficult to find storage space here, and local residents currently have to drive out of the neighborhood to find available storage options, increasing traffic for all. This project will help relieve the pent-up demand. I have been happy with the service at this location and support the new project.

Thank you,



Re: Case No. CPC-2024-115-GPA-ZC-HD-CU-ZAA-SPR

Dear Mr. Trinh,

I'm a long-time customer at Public Storage at 12681 W Jefferson, and I just wanted to say how much I support the plan to improve the property by building an additional storage building next to the existing building. I store my belongings there and have always appreciated the staff and how clean and secure the place is.

From what I've seen of the project design, I think it will really help the neighborhood—not just the customers. The building and landscaping look nice, and the new building will make use of the empty site with both retail and storage uses.

It is difficult to find available clean secure storage in this area, so we need more to support residents and businesses in our community. Otherwise, local residents and businesses need to drive a long way out of the area to find available storage space.

Please support this project. I believe it's good for the area and shows that responsible businesses like Public Storage want to be good, long-term neighbors on West Jefferson.

Sincerely,

Area resident & long-time customer

Re: Case No. CPC-2024-115-GPA-ZC-HD-CU-ZAA-SPR

Dear Mr. Trinh,

I'm a long-time customer at Public Storage at 12681 W Jefferson, and I just wanted to say how much I support the plan to improve the property by building an additional storage building next to the existing building. I store my belongings there and have always appreciated the staff and how clean and secure the place is.

From what I've seen of the project design, I think it will really help the neighborhood—not just the customers. The building and landscaping look nice, and the new building will make use of the empty site with both retail and storage uses.

It is difficult to find available clean secure storage in this area, so we need more to support residents and businesses in our community. Otherwise, local residents and businesses need to drive a long way out of the area to find available storage space.

Please support this project. I believe it's good for the area and shows that responsible businesses like Public Storage want to be good, long-term neighbors on West Jefferson.

Sincerely,

Area resident & long-time customer



Sincerely,

Jeff Modrzejewski
Executive Director