Environmental Checklist Form (Initial Study)

County of Los Angeles, Department of Regional Planning

Project title: Trojan Calabasas / Project No. 2020-000422 / Case No(s). RPPL2020000735

Lead agency name and address: Los Angeles County, 320 West Temple Street, Los Angeles, CA 90012

Contact Person and phone number: Ingo Giani, 310-372-8600

Project sponsor's name and address: Trojan Storage, 1732 Aviation Boulevard, Suite 217, Redondo Beach, California 90278

Project location: Vicinity of Old Scandia Lane and Ventura Boulevard, at 5050 Old Scandia Lane, in unincorporated County of Los Angeles (County). The Project site is north of the City of Calabasas and south of the City of Hidden Hills. *Assessor Parcel Number (APN)*: 2049-022-040 *United States Geological Survey (USGS) Quad*: Calabasas. See **Exhibit 1: Regional Vicinity**; and **Exhibit 2: Site Vicinity**.

Gross Acreage: 3.83

General Plan Designation: N/A.

Community/Area wide Plan Designation: C (Commercial) land use category of the Santa Monica Mountains North Area Plan Land Use Policy Map.

Zoning: Malibu Zoned District, M-1 (Light Manufacturing) Zone. Surrounding zoning is City of Hidden Hills large-lot residential to the north, M-1 Zone to the south and east, and Heavy Manufacturing – Development Program (M-2-DP) Zone to the west.

Description of project: The Project site is comprised of a single approximately 3.83-gross acre vacant undeveloped property situated immediately east of the existing Los Angeles Pet Cemetery. The Old Scandia Lane frontage contains an approximately 11-foot area with sidewalk and ornamental landscaping.

The Project proposes construction and operation of an approximately 155,900 square feet (SF) of self-storage facility (79,991 SF aboveground and 75,901 SF belowground) in three buildings, with 1,334 self-storage units, a 2,000 SF office/manager's residence, and 27 surface parking spaces; see **Exhibit 3: Conceptual Site Plan.** Development is oriented toward the site's Old Scandia Lane frontage to avoid the steep-sloped hillside at the site's rear/northern portion. Primary access to the Project site is proposed via an entrance/exit driveway off of Old Scandia Lane. The proposed facility would provide storage space for personal goods, business goods, and recreational vehicles. No outside storage is proposed. The hours of operation would be from 9 AM to 9 PM daily.

The Project's construction activities are anticipated to occur over approximately 18 months, beginning in April 2023 and ending December 2024. Construction would require approximately 39,370 cubic yards (CY) of earthwork (approximately 37,805 CY of cut and 1,565 CY of fill), with a net export of approximately 36,240 CY. Grading would be mostly toward the site's southern portion, where buildings and paved areas are proposed.

Surrounding land uses and setting: The Project site is in the Santa Monica Mountains North Area, north of the 101 Freeway and Ventura Boulevard. The Project site is entirely undeveloped and disturbed by pre-existing conditions. The Project site's topography contains moderate to steep slopes, with elevations increasing towards the site's rear portion and ranging from 945 to 1,050 feet above mean sea level. The onsite vegetation is ruderal/disturbed and several ornamental pepper trees occur at the Project site's northeastern and southwestern portions.

The land uses surrounding the Project site are vacant land and City of Hidden Hills large-lot single-family residential uses to the north, light industrial/manufacturing uses to the south (beyond Old Scandia Lane), light industrial and commercial uses to the east, and a pet cemetery to the west.

Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code § 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

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

The County has received one request for consultation; see **Section 18: Tribal Cultural Resources**.

Other public agencies whose approval may be required (e.g., permits, financing approval, or participation agreement):

Public Agency	*Approval Required*
U.S. Army Corps of Engineers	Nationwide Permit
California Department of Fish and Wildlife (CDFW)	§ 1602 Lake or Streambed Alteration Agreement
Los Angeles Regional Water Quality Control Board	Water Discharge Requirements (WDR)

Major projects in the area:

Project/Case No.	*Description and Status*
None	N/A

Exhibit 1: Regional Vicinity

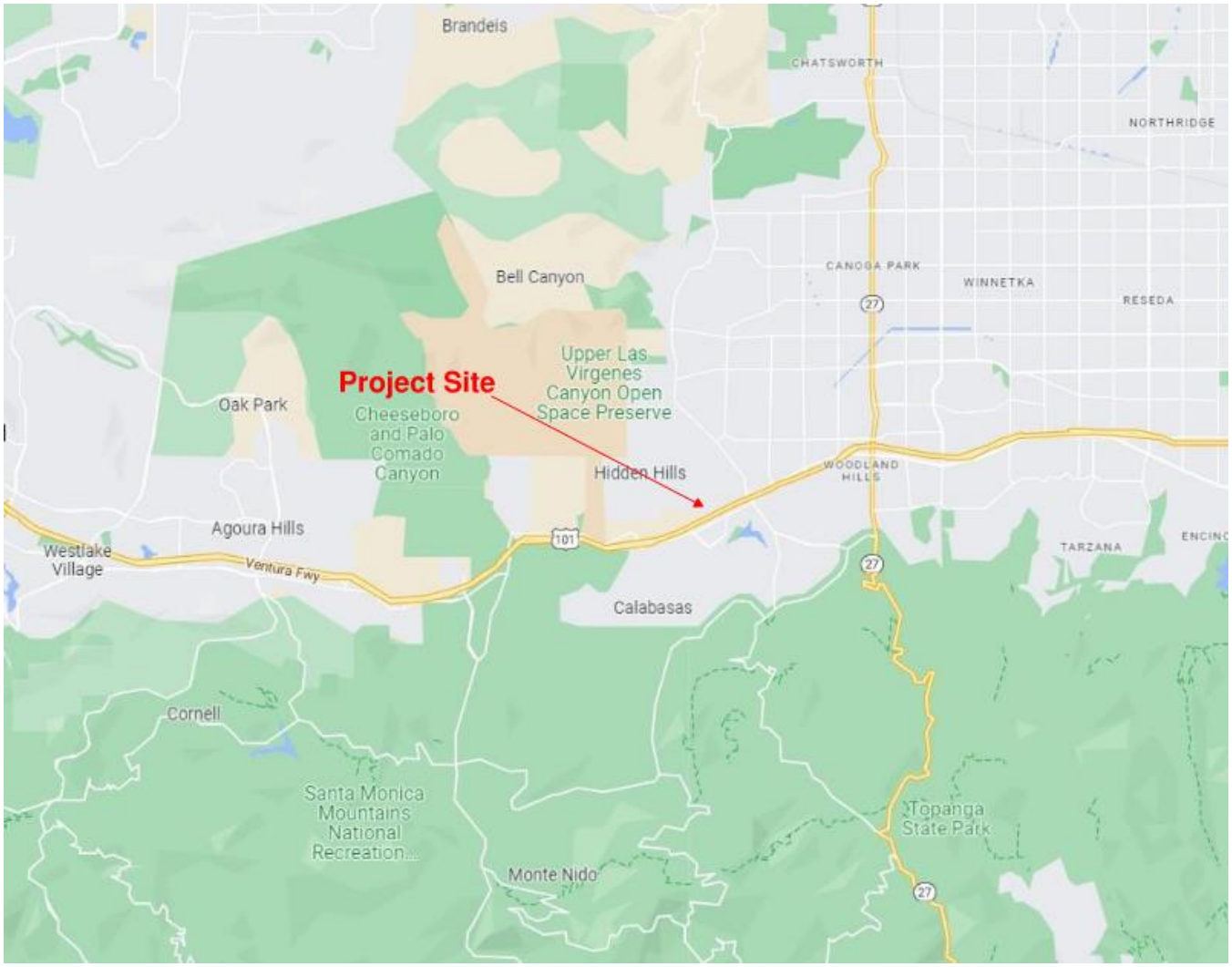


Exhibit 2: Site Vicinity

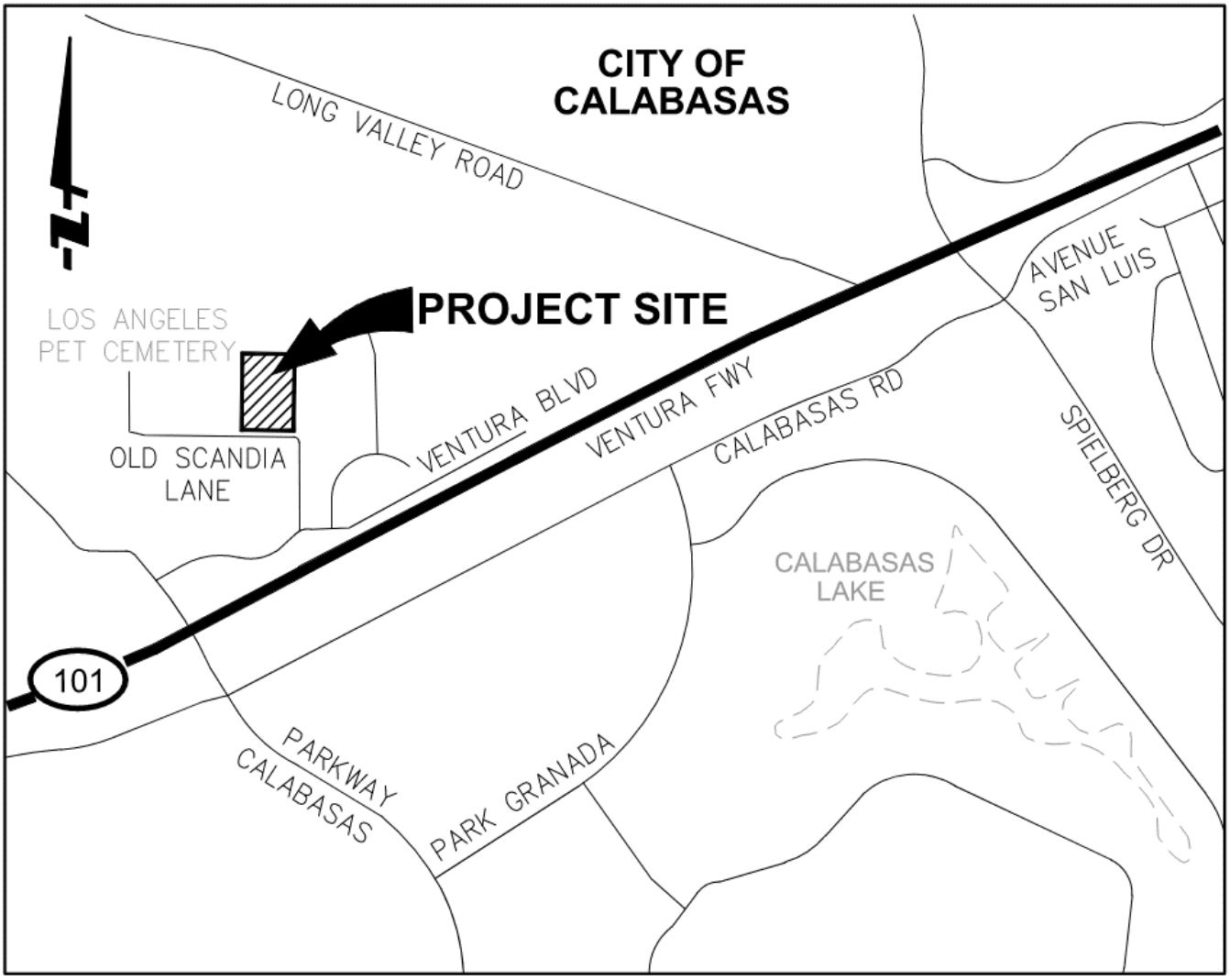
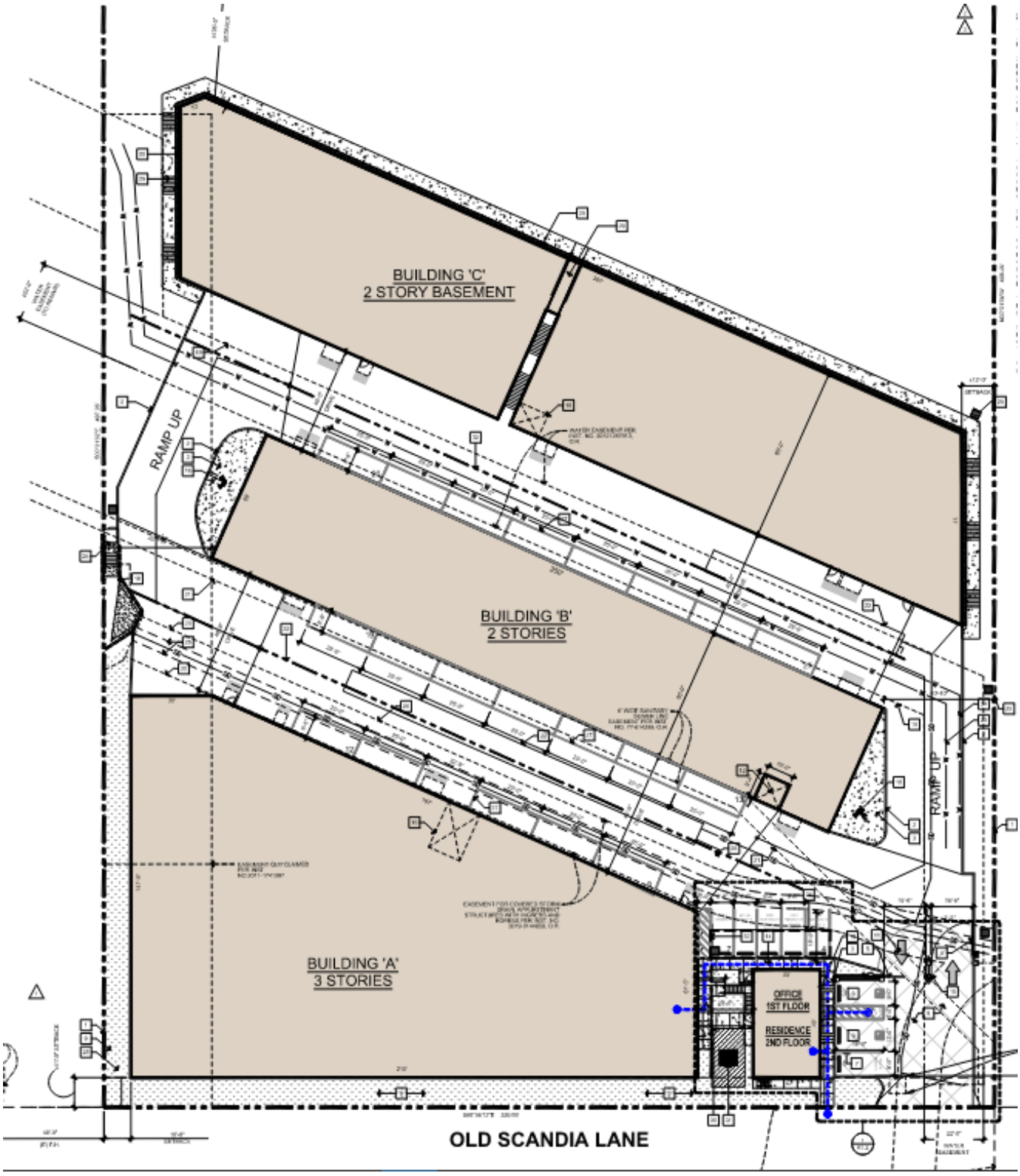


Exhibit 3: Conceptual Site Plan



Reviewing Agencies: [*See* **CEQA Appendix B** *to help determine which agencies should review your project***]**

Responsible Agencies	*Special Reviewing Agencies*	*Regional Significance*
☐ None Regional Water Quality Control Board: ☒ Los Angeles Region ☐ Lahontan Region ☐ Coastal Commission ☒ Army Corps of Engineers ☐ LAFCO	☐ None ☒ Santa Monica Mountains Conservancy ☐ National Parks ☐ National Forest ☐ Edwards Air Force Base ☐ Resource Conservation District of Santa Monica Mountains Area	☐ None ☐ SCAG Criteria ☐ Air Quality ☐ Water Resources ☒ Santa Monica Mountains Area
Trustee Agencies	*County Reviewing Agencies*	
☐ None ☒ State Dept. of Fish and Wildlife ☐ State Dept. of Parks and Recreation ☐ State Lands Commission ☐ University of California (Natural Land and Water Reserves System)	☒ DPW – Land Development Division ☒ Fire Department ☒ Public Health/Environmental Health Division:	

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially significant impacts affected by this project.

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

DETERMINATION: (To be completed by the Lead Department.)
On the basis of this initial evaluation:

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

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

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

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

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

William Chen — 8-28-24

Signature (Prepared by) — Date

Rob Glaser — 8-28-24

Signature (Approved by) — 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 the Lead Department 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 Department 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 mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level. (Mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced.)

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA processes, an effect has been adequately analyzed in an earlier EIR or negative declaration. (State CEQA Guidelines § 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) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

7) The explanation of each issue should identify: the significance threshold, if any, used to evaluate each question, and; mitigation measures identified, if any, to reduce the impact to less than significant. Sources of thresholds include the County General Plan, other County planning documents, and County ordinances. Some thresholds are unique to geographical locations.

1. AESTHETICS

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
Except as provided in Public Resources Code § 21099, would the project:				
1a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒

There are no scenic vistas within or adjacent to the Project site.[1] Therefore, the Project would not result in any adverse effect on a scenic vista. No impact would occur.

1b) Be visible from or obstruct views from a regional riding, hiking, or multi-use trail?	☐	☐	☐	☒

There are no regional riding, hiking, or multi-use trails that traverse or are near the Project site.[2] The trail nearest the Project site (Calabasas Stairs Trail) is approximately 1.7 miles to the south. There are no views of the Project site from this trail given they are obstructed by intervening residential and other uses. Therefore, the Project would not be visible from or obstruct views from a regional riding, hiking, or multi-use trail. No impact would occur.

1c) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒

The Project site is not near a State scenic highway.[3] There are no special status or landmark trees located onsite. Only sparse ruderal/disturbed vegetation occurs onsite, with several ornamental pepper trees at the Project site's northeastern and southwestern portions; see Responses 4a and 4b. Additionally, there are no rock outcroppings or historic buildings on or near the Project site; see Response 5a. Therefore, the Project would not damage any scenic resource within a State scenic highway. No impact would occur.

1d) Substantially degrade the existing visual character or quality of public views of the site and its surroundings because of height, bulk, pattern, scale, character, or other features and/or conflict with applicable zoning and other regulations governing scenic quality? (Public views are those that are experienced from publicly accessible vantage point)	☐	☐	☒	☐

The land uses surrounding the Project site are vacant land and large-lot single-family residential uses to the north, light industrial/manufacturing uses to the south, light industrial and commercial uses to the east, and a pet cemetery to the west. Therefore, public views of the Project site are limited to the site's frontage, as

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([1] Los Angeles County Department of Regional Planning. SMMLCP-NET: Scenic Resources layer. https://rpgis.isd.lacounty.gov/Html5Viewer/index.html?viewer=SMMLCP_NET.SMMLCP. Accessed 06/15/22.

[2] Los Angeles County Department of Regional Planning. SMMLCP-NET: Scenic Resources layer. https://rpgis.isd.lacounty.gov/Html5Viewer/index.html?viewer=SMMLCP_NET.SMMLCP. Accessed 06/15/22.

[3] Caltrans. 2022. State Scenic Highways Map. https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways. Accessed 08/26/22.

experienced from Old Scandia Lane. The Project proposes one three-story storage building (maximum building height of 75 feet) and one two-story office/residence building (maximum building height of 75 feet) along the site's frontage (Old Scandia Lane), and two two-story storage buildings on the middle and northern portions of the site (maximum building height of 75 feet). Thus, the Project places the taller buildings near existing industrial buildings to the south and transitions to shorter buildings near single-family residential uses to the north. The Project site is zoned M-1 and the self-storage facility is a permitted use in the M-1 Zone; see County Municipal Code (LACMC) Chapter 22.332 and County of Los Angeles Code of Ordinances (County Code) § 22.22.010.[4,5] The development is subject to compliance with the M-1 Zone's site development standards that influence visual character (e.g., building materials and height, lot coverage, setbacks, etc.).[6,7] As a light industrial use, the self-storage facility would be compatible with the immediately adjacent industrial/manufacturing uses to the south, and the light industrial and commercial uses to the east, concerning height, bulk, pattern, scale, and character. Moreover, the self-storage facility would continue the pattern of existing light industrial uses. Therefore, the Project would not degrade the existing visual character or quality of public views of the site or its surroundings. A less than significant impact would occur, and no mitigation is required.

1e) Create a new source of substantial shadows, light, or glare which would adversely affect day or nighttime views in the area? ☐ ☐ ☒ ☐

The Project site is not within a Rural Outdoor Lighting District, however, the cemetery adjacent to the west is within a Rural Outdoor Lighting District.[8] Existing outdoor lighting at and near the Project site is associated with light industrial, commercial, single-family residential, and street lighting along Old Scandia Way typical of urbanized areas. The Project would generate lighting from two primary sources: lighting from building interiors that would pass through windows, and lighting from exterior sources (e.g., building illumination, parking lot and drive aisle lighting, security lighting, and landscape lighting). The Project would be subject to compliance with County Code § 22.140.560 lighting standards, which include requirements for light shielding, deflecting, and shading.[9] The Project's drive aisles are interior to the Project site, thus, drive aisle lighting would also be shielded by the proposed buildings. Therefore, a less than significant impact would occur, and no mitigation is required.

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[4] County of Los Angeles Municipal Code. 2022. Chapter 22.336.060. https://library.municode.com/ca/los_angeles_county/codes/code_of_ordinances/354460?nodeId=TIT22PLZO_DIV10COSTDI_CH22.336SAMOMONOARCOSTDI_22.336.060COWIDEST. Accessed 08/26/2022.

[5] County of Los Angeles Code of Ordinances. 2022. Title 22 Planning and Zoning – Chapter 22.22 Industrial Zones. https://library.municode.com/ca/los_angeles_county/codes/code_of_ordinances?nodeId=TIT22PLZO_DIV3ZO_CH22.22INZO_22.22.010PU. Accessed 08/26/22.

[6] County of Los Angeles Code of Ordinances. Title 22 Planning and Zoning – Division 6, Development Standards. https://library.municode.com/ca/los_angeles_county/codes/code_of_ordinances?nodeId=TIT22PLZO_DIV6DEST. Accessed 08/26/22.

[7] County of Los Angeles Municipal Code. 2022. Chapter 22.336.060. https://library.municode.com/ca/los_angeles_county/codes/code_of_ordinances/354460?nodeId=TIT22PLZO_DIV10COSTDI_CH22.336SAMOMONOARCOSTDI_22.336.060COWIDEST. Accessed 08/26/2022.

[8] Los Angeles County Department of Regional Planning. https://rpgis.isd.lacounty.gov/Html5Viewer/index.html?viewer=GISNET_Public.GIS-NET_Public. Accessed 06/15/22.

[9] County of Los Angeles Code of Ordinances. Title 22 Planning and Zoning – Section 22.140.560, Self-Service Storage Facilities. https://library.municode.com/ca/los_angeles_county/codes/code_of_ordinances?nodeId=TIT22PLZO_DIV7STSPUS_CH22.140STSPUS_22.140.560SERVSTFA. Accessed 08/26/2022.

2. AGRICULTURE / FOREST

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 Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
Would the project:				
2a) 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?	☐	☐	☐	☒

There are no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance within or adjacent to the Project site.[10] The Project site is mapped as "Other Land"; thus, the Project would not convert Farmland to non-agricultural use. No impact would occur.

2b) Conflict with existing zoning for agricultural use, with a designated Agricultural Resource Area, or with a Williamson Act contract?	☐	☐	☐	☒

The Project site is zoned M-1 and there is no nearby zoning for agricultural use. Therefore, the Project would not conflict with existing zoning for agricultural use. The Project site is not within a designated Agricultural Resource Area.[11] The County does not participate in the Williamson Act program; thus, the Project site is not under a Williamson Act contract.[12] No impact would occur.

2c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code § 12220 (g)), timberland (as defined in Public Resources Code § 4526), or timberland zoned Timberland Production (as defined in Government Code § 51104(g))?	☐	☐	☐	☒

[10] Department of Conservation. *California Important Farmland Finder*. https://maps.conservation.ca.gov/dlrp/ciff/. Accessed 06/14/22.
[11] Los Angeles County Department of Regional Planning. *GIS-NET: Agricultural Resource Area layer*. https://rpgis.isd.lacounty.gov/Html5Viewer/index.html?viewer=GISNET_Public.GIS-NET_Public. Accessed 06/14/22.
[12] Department of Conservation. *2022 Williamson Act Status Report*. https://www.conservation.ca.gov/dlrp/wa/Documents/stats_reports/2022%20WA%20Status%20Report.pdf. Accessed 06/14/22.

The Project site is zoned M-1 and there is no nearby zoning for forest land. Therefore, the Project would not conflict with existing zoning for timberland or timberland production. No impact would occur.

2d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒

The Project site is a vacant and undeveloped lot. The onsite vegetation is ruderal/disturbed and several ornamental pepper trees occur at the Project site's northeastern and southwestern portions. The Project site is surrounded by urban uses. There is no forest land on or near the Project site. Therefore, no impact would occur.

2e) 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?	☐	☐	☐	☒

There are no Farmlands or forest lands on or near the Project site. Therefore, the Project would not involve changes in the existing environment which could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use. No impact would occur.

3. AIR QUALITY

This section is based on the Air Quality Assessment (Kimley-Horn, 2022) and Greenhouse Gas Emissions Assessment, which are included in their entirety as **Appendix A1: Air Quality Assessment**.

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
Would the project:				
3a) Conflict with or obstruct implementation of applicable air quality plans of either the South Coast AQMD (SCAQMD) or the Antelope Valley AQMD (AVAQMD)?	☐	☐	☒	☐

South Coast Air Quality Management District (South Coast AQMD) Thresholds

Mass Emissions Thresholds

The South Coast AQMD CEQA Air Quality Handbook provides significance thresholds for volatile organic compounds (VOC) (also referred to as reactive organic gases [ROG]), nitrogen oxides (NOX), carbon monoxide (CO), sulfur oxides (SOX), particulate matter 10 microns or less in diameter (PM10), and particulate matter 2.5 microns or less in diameter (PM2.5). The significance thresholds apply to a project's construction and operations within the South Coast AQMD jurisdictional boundaries. However, ultimately the lead agency determines the significance thresholds for impacts. If a project proposes development in excess of the established significance thresholds outlined in **Table 3-1: South Coast Air Quality Management District Emissions Thresholds**, a significant air quality impact could occur, and additional analysis is warranted to fully assess the significance of Project impacts.

TABLE 3-1: SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT EMISSIONS THRESHOLDS		
CRITERIA AIR POLLUTANTS AND PRECURSORS	(MAXIMUM POUNDS PER DAY)	
	CONSTRUCTION	OPERATIONS
Reactive Organic Gases (ROG)	75	55
Carbon Monoxide (CO)	550	550
Nitrogen Oxides (NO_X)	100	55
Sulfur Oxides (SO_X)	150	150
Coarse Particulates (PM_{10})	150	150
Fine Particulates ($PM_{2.5}$)	55	55
Source: South Coast Air Quality Management District. (2019). South Coast AQMD Air Quality Significance Thresholds.		

Localized Carbon Monoxide

In addition to the daily thresholds listed above, the Project would also be subject to the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). These are addressed though an analysis of localized CO impacts. The significance of localized impacts depends on whether ambient CO levels near a project site are above CAAQS and NAAQS for CO (the more stringent CAAQS

are 20 ppm for 1-hour and 9 ppm for 8-hour). The South Coast Air Basin (SCAB) has been designated as attainment under the 1-hour and 8-hour CAAQS and NAAQS.

Localized Significance Thresholds

In addition to the CO hotspot analysis, the South Coast AQMD developed localized significance thresholds (LSTs) for NO2, CO, PM10, and PM2.5 emissions generated at new development sites (off-site mobile source emissions are not included in the LST analysis). LSTs represent the maximum emissions that can be generated at a project without expecting to cause or substantially contribute to an exceedance of the most stringent CAAQS or NAAQS. LSTs are based on the ambient concentrations of that pollutant within a project source receptor area (SRA), as demarcated by the South Coast AQMD, and the distance to the nearest sensitive receptor. LST analysis for construction is applicable for all projects that disturb 5.0 acres or less on a single day. The Project site is located within South Coast AQMD SRA 6 (West San Fernando Valley). **Table 3-2: Local Significance Thresholds for Construction/Operations**, shows the LSTs for a 1.0-acre, 2.0-acre, and 5.0-acre project site in SRA 6 with sensitive receptors located within 25 meters of a project site. LSTs associated with all acreage categories are provided in **Table 3-2** for informational purposes. **Table 3-2** shows that the LSTs increase as acreages increase. It is noted that LSTs are screening thresholds and are therefore conservative.

TABLE 3-2: LOCAL SIGNIFICANCE THRESHOLDS (CONSTRUCTION/OPERATIONS)				
PROJECT SIZE	(MAXIMUM POUNDS PER DAY)			
	NITROGEN OXIDE (NO_X)	CARBON MONOXIDE (CO)	COARSE PARTICULATES (PM_{10})	FINE PARTICULATES ($PM_{2.5}$)
1.0 Acre: Construction Operations	103/103	426/426	4/1	3/1
2.0 Acres: Construction Operations	147/147	644/644	6/2	4/1
5.0 Acres: Construction Operations	221/221	1,158/1,158	11/3	6/2
Source: South Coast Air Quality Management District. (July 2008). *Localized Significance Threshold Methodology*.				

AQMP Consistency

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

The Project site is within the SCAB, which is under the South Coast AQMD's jurisdiction. The South Coast AQMD is required, pursuant to the FCAA, to reduce criteria pollutant emissions for which the SCAB is in nonattainment. To reduce such emissions, the South Coast AQMD adopted the 2016 and 2022 AQMPs (AQMPs). The AQMPs establish a program of rules and regulations directed at reducing air pollutant emissions and achieving CAAQS and NAAQS. The AQMPs are a regional and multi-agency effort including the South Coast AQMD, the CARB, the Southern California Association of Governments (SCAG), and the U.S. EPA. The AQMPs pollutant control strategies are based on the latest scientific and technical information and planning assumptions, including SCAG's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), updated emission inventory methodologies for various source categories, and SCAG's latest growth forecasts. SCAG's latest growth forecasts were defined in consultation with local governments and with reference to local general plans. The Project is subject to the AQMPs.

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

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

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

The violations to which Consistency Criterion No. 1 refers are CAAQS and NAAQS. As shown in **Table 3-3: Project Construction Emissions** and **Table 3-4: Operational Emissions** below, Project construction and operational emissions would not exceed CAAQS or NAAQS. Therefore, the Project would not contribute to an existing air quality violation and is consistent with the first criterion.

Concerning Consistency Criterion No. 2, the AQMPs contain air pollutant reduction strategies based on SCAG's latest growth forecasts, which were defined in consultation with local governments and with reference to local general plans. The Project site is designated Rural Commercial and zoned M-1 (Light Manufacturing). The M-1 zone allows for light industry, repair, wholesale, and packaging, including the manufacture, assembly, distribution, and storage of goods that have low nuisance impacts; therefore, the Project is a permitted use. Given no General Plan or Zoning amendments are proposed/required, and since the Project would generate only nominal population growth (three persons, see Response 14a), the Project would not exceed the population or job growth projections used by the South Coast AQMD to develop the AQMPs. Thus, the Project is consistent with the second criterion. A less than significant impact would occur , and no mitigation is required.

3b) 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? ☐ ☐ ☒ ☐

Construction Air Pollutant Emissions

Project construction activities would generate short-term criteria air pollutant emissions. Construction-generated emissions are short-term and of temporary duration, lasting only as long as construction activities occur. Construction activities temporarily generate emissions from site grading, road paving, motor vehicle exhaust associated with construction equipment and worker trips, and the movement of construction equipment, especially on unpaved surfaces. Airborne particulate matter emissions are largely dependent on the amount of ground disturbance associated with site preparation activities, as well as weather conditions and the appropriate application of water.

The Project's construction activities are estimated to occur over approximately 18 months, beginning in April 2023 and ending December 2024. The Project's construction-generated emissions were calculated using CARB-approved California Emissions Estimator Model (CalEEMod) version 2020.4.0, which models emissions for land use development projects, based on typical construction requirements. See **Appendix A1: Air Quality Assessment** for more information regarding the construction assumptions used in this analysis.

Table 3-3: Project Construction Emissions provides the Project's estimated maximum daily construction-related criteria pollutant emissions and indicates these would remain below South Coast AQMD significance thresholds. Therefore, the Project's construction-related air pollutant emissions would be less than significant, and no mitigation is required. Notwithstanding, the Project would be subject to compliance with South Coast AQMD Rules 402, 403, and 1113, which prohibit nuisances, require dust control measures, and limit VOC content in paints, respectively. Compliance with South Coast AQMD rules have been included in CalEEMod.

TABLE 3-3: PROJECT CONSTRUCTION EMISSIONS

CONSTRUCTION YEAR	(MAXIMUM POUNDS PER DAY)					
	REACTIVE ORGANIC GASES (ROG)	NITROGEN OXIDE (NOX)	CARBON MONOXIDE (CO)	SULFUR DIOXIDE (SO2)	COARSE PARTICULATE MATTER (PM10)	FINE PARTICULATE MATTER (PM2.5)
2023	2.72	27.57	19.18	0.06	9.29	5.47
2024	19.79	15.93	21.20	0.04	1.74	0.93
South Coast AQMD Threshold	75	100	550	150	150	55
Exceed South Coast AQMD Threshold?	No	No	No	No	No	No

Notes: South Coast AQMD Rule 403 Fugitive Dust applied. The Rule 403 reduction/credits include the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; cover stockpiles with tarps; water all haul roads twice daily; and limit speeds on unpaved roads to 15 miles per hour. Reductions percentages from the South Coast AQMD CEQA Handbook (Tables XI-A through XI-E) were applied.

Source: CalEEMod version 2020.4.0. Refer to **Appendix A1: Air Quality Assessment** for Model Data Outputs.

Operational Air Pollutant Emissions

Operational emissions are typically associated with three sources: mobile sources (i.e., motor vehicle use); area sources (i.e., landscape maintenance equipment, hearths, consumer products, and architectural coatings); and energy sources (i.e., electricity and natural gas (non-hearth) usage). **Table 3-4: Operational Emissions** provides the Project's estimated operational criteria pollutant emissions and indicates these would remain below South Coast AQMD significance thresholds. Therefore, the Project's operational air pollutant emissions would be less than significant, and no mitigation is required.

TABLE 3-4: OPERATIONAL EMISSIONS						
SOURCE	**EMISSIONS (POUNDS PER DAY)1**					
	ROG	**NOX**	**CO**	**SO2**	**PM10**	**PM2.5**
Area	3.56	0.02	0.35	<1	0.04	0.04
Energy	0.02	0.17	0.14	<1	0.01	0.01
Mobile	0.82	0.96	9.04	0.02	2.18	0.59
Total	**4.40**	**1.15**	**9.53**	**0.02**	**2.23**	**0.64**
South Coast AQMD Threshold	55	55	550	150	150	55
South Coast AQMD Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Notes:
1. Emissions were calculated using the California Emissions Estimator Model (CalEEMod) version 2020.4.0, as recommended by the South Coast AQMD. Worst-case seasonal maximum daily emissions are reported.

Cumulative Construction Impacts

The SCAB is designated nonattainment for CAAQS for O_3, PM_{10}, and $PM_{2.5}$ and nonattainment for NAAQS O_3 and $PM_{2.5}$. Appendix D of the South Coast AQMD White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution (2003) notes that projects that result in emissions that do not exceed the project-specific South Coast AQMD regional thresholds of significance should result in a less than significant impact on a cumulative basis unless there is other pertinent information to the contrary. The mass-based regional significance thresholds published by the South Coast AQMD are designed to ensure compliance with both NAAQS and CAAQS and are based on an inventory of projected SCAB emissions. Therefore, if a project is estimated to result in construction emissions that do not exceed the thresholds, the project's contribution to the cumulative impact on air quality in the SCAB would not be cumulatively considerable.

As shown in **Table 3-3** above, Project construction-related emissions by themselves would not exceed the South Coast AQMD significance thresholds for criteria pollutants. Therefore, the Project would not generate a cumulatively considerable contribution to air pollutant emissions during construction and impacts would be less than significant.

Cumulative Operational Impacts

The South Coast AQMD has not established separate significance thresholds for cumulative operational emissions. The nature of air emissions is largely a cumulative impact. As a result, no single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. Instead, individual project emissions contribute to existing cumulatively significant adverse air quality impacts. The South Coast AQMD developed the operational thresholds of significance based on the level above which individual project emissions would result in a cumulatively considerable contribution to the SCAB's existing air quality conditions. Therefore, if a project is estimated to result in operational emissions that do not exceed the thresholds, the project's contribution to the cumulative impact on air quality in the SCAB would not be cumulatively considerable.

As shown in **Table 3-4** above, Project operational emissions by themselves would not exceed the South Coast AQMD significance thresholds for criteria pollutants. Therefore, the Project would not generate a cumulatively considerable contribution to air pollutant emissions during operations and impacts would be less than significant.

3c) Expose sensitive receptors to substantial pollutant concentrations? ☐ ☐ ☒ ☐

Construction Localized Significance Analysis

The sensitive receptors nearest the Project site are the single-family residential uses located approximately 485 feet (148 meters) to the north. To determine potential impacts to sensitive receptors, the South Coast AQMD recommends addressing LSTs for construction. LSTs were developed in response to South Coast AQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4). The South Coast AQMD provided the Final Localized Significance Threshold Methodology (dated June 2003 [revised 2008]) for guidance. The LST methodology assists lead agencies in analyzing localized impacts associated with project-specific level analyses.

The South Coast AQMD's methodology indicates that "off-site mobile emissions from the Project should not be included in the emissions compared to LSTs." Therefore, for purposes of the construction LST analysis, only emissions included in the CalEEMod "on-site" emissions outputs were considered. As previously noted, the sensitive receptors nearest the Project site are single-family residential uses located approximately 485 feet (148 meters) to the north. LSTs are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. Therefore, LSTs for receptors located at 148 meters were utilized in this analysis.

Table 3-5: Localized Significance of Construction Emissions, provides the Project's estimated construction-related localized emissions on the peak day of construction and shows emissions concentrations at nearby sensitive receptors would remain below South Coast AQMD significance thresholds. Therefore, the Project would result in a less than significant impact concerning LSTs during construction and no mitigation is required.

TABLE 3-5: LOCALIZED SIGNIFICANCE OF CONSTRUCTION EMISSIONS				
SOURCE/ACTIVITY	**EMISSIONS (POUNDS PER DAY)1**			
	NOX	**CO**	**PM10**	**PM2.5**
Construction Emissions				
Site Preparation 2023	27.52	18.24	9.10	5.42
Grading 2023	17.94	14.75	3.42	2.14
Building Construction 2023	14.38	16.24	0.70	0.66
Building Construction 2024	13.44	16.17	0.61	0.58
Paving 2024	8.27	12.22	0.40	0.37
Architectural Coating 2024	1.22	1.81	0.06	0.06
Maximum Daily Emissions	*27.52*	*18.24*	*9.10*	*5.42*
South Coast AQMD Localized Screening Threshold (2.5 acres of disturbance at 148 meters)	186	2,210	51	17
Exceed South Coast AQMD Threshold?	**No**	**No**	**No**	**No**
Source: CalEEMod version 2020.4.0. Refer to **Appendix A1: Air Quality Assessment** for Model Data Outputs.				

Operational Localized Significance Analysis

According to the South Coast AQMD LST methodology, operational LSTs apply to on-site sources. LSTs for receptors located at 148 meters for SRA 6 were utilized in this analysis. The 3.5-acre LST was conservatively used for the 3.83-acre Project site. The operational emissions shown in **Table 3-6: Localized Significance of Operational Emissions** include all on-site Project-related stationary sources (i.e., area and energy sources). **Table 3-6** shows the Project's maximum daily operational pollutant emissions at nearby sensitive receptors would remain below South Coast AQMD significance thresholds. Therefore, the Project would result in a less than significant impact concerning LSTs during operations and no mitigation is required.

TABLE 3-6: LOCALIZED SIGNIFICANCE OF OPERATIONAL EMISSIONS				
ACTIVITY	(MAXIMUM POUNDS PER DAY)			
	NITROGEN OXIDE (NOX)	CARBON MONOXIDE (CO)	COARSE PARTICULATE MATTER (PM10)	FINE PARTICULATE MATTER (PM2.5)
On-Site Emissions (Area and Energy)	0.19	0.49	0.05	0.05
South Coast AQMD Localized Screening Threshold (3.5 acres at 148 meters)	208	2,552	14	5
Exceed South Coast AQMD Threshold?	**No**	**No**	**No**	**No**
Source: CalEEMod version 2020.4.0. Refer to **Appendix A1: Air Quality Assessment** for Model Data Outputs.				

Criteria Pollutant Health Impacts

On December 24, 2018, the California Supreme Court issued an opinion identifying the need to provide sufficient information connecting a project's air emissions to health impacts or explain why such information could not be ascertained (*Sierra Club v. County of Fresno* [Friant Ranch, L.P.] [2018] Cal.5th, Case No. S219783). The South Coast AQMD has set its CEQA significance thresholds based on the Federal Clean Air Act (FCAA), which defines a major stationary source (in extreme ozone nonattainment areas such as the SCAB) as emitting 10 tons per year. The thresholds correlate with the trigger levels for the federal New Source Review (NSR) Program and South Coast AQMD Rule 1303 for new or modified sources. The NSR Program[13] was created by the FCAA to ensure that stationary sources of air pollution are constructed or modified in a manner that is consistent with attainment of health-based NAAQS. The NAAQS establish the levels of air quality necessary, with an adequate margin of safety, to protect the public health. Therefore, projects that do not exceed the South Coast AQMD's LSTs and mass emissions thresholds would not violate any air quality standards or contribute substantially to an existing or projected air quality violation and no criteria pollutant health impacts would occur.

As previously discussed, Project emissions would not exceed South Coast AQMD thresholds (see **Table 3-3** and **Table 3-4**), thus, would be less than significant. Localized effects of on-site Project emissions on nearby sensitive receptors were also found to be less than significant (see **Table 3-5** and **Table 3-6**). The LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable CAAQS and NAAQS. The LSTs were developed by the South Coast AQMD based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. The CAAQS and NAAQS establish the levels of air quality necessary, with an adequate margin of safety, to protect public health, including protecting the health of sensitive populations such as

[13] Code of Federal Regulation (CFR) [i.e., PSD (40 CFR 52.21, 40 CFR 51.166, 40 CFR 51.165 (b)), Non-attainment NSR (40 CFR 52.24, 40 CFR 51.165, 40 CFR part 51, Appendix S)

asthmatics, children, and the elderly. As shown above, Project-related emissions would not exceed the regional thresholds or the LSTs, and therefore would not exceed the CAAQS or NAAQS or cause an increase in the frequency or severity of existing violations of air quality standards. Therefore, sensitive receptors would not be exposed to criteria pollutant levels in excess of the health-based ambient air quality standards.

Carbon Monoxide Hotspots

An analysis of CO "hot spots" is needed to determine whether a project's change in the level of service (LOS) at an intersection could result in exceedances of the NAAQS or CAAQS. It has long been recognized that CO exceedances are caused by vehicular emissions, primarily when vehicles are idling at intersections. Vehicle emissions standards have become increasingly stringent in the last 20 years. Currently, the CO vehicle emissions standard in California is a maximum of 3.4 grams per mile for passenger cars (requirements for certain vehicles are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities, CO concentrations have steadily declined.

Accordingly, with the steadily decreasing CO emissions from vehicles, even very busy intersections do not result in exceedances of the CAAQS or NAAQS for CO. An analysis prepared for CO attainment in the SCAB by the South Coast AQMD can assist in evaluating the potential for CO exceedances. CO attainment was thoroughly analyzed as part of the South Coast AQMD's 2003 Air Quality Management Plan (AQMP). The SCAB was re-designated as attainment in 2007 and is no longer addressed in the South Coast AQMD's AQMP.

The 2003 AQMP is the most recent version that addresses CO concentrations. As part of the South Coast AQMD *CO Hotspot Analysis*, the Wilshire Boulevard/Veteran Avenue intersection, one of Southern California's most congested intersections with an average daily traffic (ADT) volume of approximately 100,000 vehicles, was modeled for CO concentrations. This modeling effort identified a CO concentration high of 4.6 parts per million (ppm), which is well below the 35 ppm NAAQS and the CAAQS 1-hour standard of 20 ppm and 8-hour standard of 9 ppm. The Project is anticipated to generate 240 daily vehicle trips,[14] thus, would not produce the volume of traffic required to generate a CO hot spot in the context of South Coast AQMD's *CO Hotspot Analysis*. As the CO hotspots were not experienced at the Wilshire Boulevard/Veteran Avenue intersection even as it accommodates 100,000 vehicles daily, it can be reasonably inferred that CO hotspots would not be experienced at any intersections near the Project site, as the Project would generate only 240 daily vehicle trips. Therefore, the Project would result in a less than significant impact concerning a CO hot spot and no mitigation is required.

3d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

During construction-related activities, some odors (not substantial pollutant concentrations) that may be detected are those typical of construction vehicles (e.g., diesel exhaust from grading and construction equipment). These odors are a temporary short-term impact that is typical of construction projects and would disperse rapidly. Given the nature and duration of construction-related odors, the Project would result in a less than significant impact concerning the creation of objectionable odors during construction and no mitigation is required.

The South Coast AQMD *CEQA Air Quality Handbook* identifies certain land uses as sources of odors. These land uses include agriculture (farming and livestock), wastewater treatment plants, food processing plants,

14 RK Engineering Group, Inc. (October 2021). Trojan Calabasas Self-Storage Project Traffic Study.

chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding. The Project proposes a self-storage facility with an office/residence, and would not include any of the land uses that have been identified by the South Coast AQMD as odor sources. Therefore, no impact concerning the creation of objectionable odors during operations would occur and no mitigation is required.

4. BIOLOGICAL RESOURCES

This section is based on the Biological Resources Assessment (LSA, 2022), which is included in its entirety as **Appendix B1: Biological Resources Assessment**, and the Jurisdictional Delineation Report (LSA, 2022), which is included in its entirety as **Appendix B2: Jurisdictional Delineation Report**.

Would the project:	*Potentially Significant Impact*	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
4a) 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 (CDFW) or U.S. Fish and Wildlife Service (USFWS)?	☐	☐	☒	☐

Based on a field investigation and database search conducted on August 16, 2022, the property is a vacant and undeveloped site that is entirely disturbed by pre-existing land uses and surrounding development. The onsite vegetation is ruderal/disturbed and several ornamental pepper trees occur at the Project site's northeastern and southwestern portions.

A literature review was conducted to assist in determining the existence or potential occurrence of special-status plant and animal species within a 1.0-mile radius of the Project site. Only one special-status species (coast horned lizard (*Phrynosoma blainvillii*)) is known to occur in the region and has records within a 1.0-mile radius of the Project site. The coast horned lizard was not observed during the field survey and the Project site is highly disturbed and lacks suitable soils for this species. There are no suitable washes and floodplains present on the Project site, which is within an urban environment with associated predators, and isolated from better habitat. No federally or State-listed species have the potential to occur on the Project site. Additionally, no USFWS designated critical habitat is present on the Project site. Therefore, the Project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. Impacts would be less than significant, and no mitigation is required.

4b) Have a substantial adverse effect on any sensitive natural communities (e.g., riparian habitat, coastal sage scrub, oak woodlands, non-jurisdictional wetlands) identified in local or regional plans, policies, regulations or by CDFW or USFWS?	☐	☐	☐	☒

The Project site is not within a County-mapped Biological Resources zone[15] or a Significant Ecological Area.[16] The Jurisdictional Delineation Report presents the results of a delineation of aquatic resources and drainage

[15] Los Angeles County Department of Regional Planning. *SMMLCP-Net: Biological Resources layer.* https://rpgis.isd.lacounty.gov/Html5Viewer/index.html?viewer=SMMLCP_NET.SMMLCP. Accessed 06/15/22.

[16] Los Angeles County Department of Regional Planning. *GIS-NET: Significant Ecological Area layer.* https://rpgis.isd.lacounty.gov/Html5Viewer/index.html?viewer=GISNET_Public.GIS-NET_Public. Accessed 06/14/22.

features conducted for the Project site. There are no rivers or lakes within or immediately adjacent to the Project limits. One jurisdictional delineated feature was identified within the Project site- a concrete box culvert and a small portion of an unnamed perennial drainage are on the site's western border. The perennial drainage lacks any associated riparian habitat; see also Response 4c. There are no sensitive natural communities (e.g., riparian habitat, coastal sage scrub, oak woodlands, non-jurisdictional wetlands) present on the Project site. Therefore, the Project would have no impact on any sensitive natural communities identified in local or region plans, policies, regulations or by CDFW or USFWS.

4c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☒	☐	☐

The USFWS National Wetlands Inventory reports there is a 9.69-acre riverine habitat crossing the Project site's southern portion; see **Exhibit 4: National Wetland Inventory**. The riverine originates offsite to the west and flows onto the site briefly before entering a concrete box culvert. The culvert remains underground through most of the site and continues underground offsite before entering Arroyo Calabasas to the east of the site. This drainage feature is likely jurisdictional as a non-wetland waters of the United States/waters of the State ((WOTUS/WOTS) and California Department of Fish and Wildlife (CDFW) jurisdictional area, as depicted on **Exhibit 5: Jurisdictional Delineation Map**, and summarized in **Table 3-7: Total Acreages of Potential Jurisdictional Areas**.

TABLE 7: TOTAL ACREAGES OF POTENTIAL JURISDICTIONAL AREAS

AGENCY	WIDTH	ACREAGE
Corps	6 feet	0.005 acre
CDFW	16 feet	0.007 acre
RWQCB	6 feet	0.005 acre

As indicated in **Table 3-7**, approximately 0.005 acre of non-wetland WOTUS/WOTS and approximately 0.007 acre of CDFW jurisdictional area exist on the Project site. Review of **Exhibit 3: Conceptual Site Plan**, and **Exhibit 5** indicates the Project does not propose any development or modifications to the riverine/drainage feature's associated culvert structure. Therefore, the Project would not impact the classified riparian habitat or potential jurisdictional waters. To avoid potential construction-related impacts to the drainage feature, the Project would be subject to compliance with Mitigation Measure (MM) BIO-1, which requires installation of signs in upland areas adjacent to the culvert structure associated with the drainage feature prior to the start of Project construction. These signs would communicate that the area is environmentally sensitive and that entry is prohibited. Therefore, the Project would result in a less than significant impact to riparian habitat/jurisdictional waters with mitigation incorporated.

4d) 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?	☐	☒	☐	☐

The property is a vacant undeveloped site that is entirely disturbed by pre-existing land uses. The Project is an infill development surrounded by single-family residential uses to the north, light industrial/manufacturing uses to the south, light industrial and commercial uses to the east, and a pet cemetery to the west. Therefore, the Project does not support regional wildlife movement or wildlife corridors.

The Project site contains pepper trees on the northeastern and southwestern portions, and a pine tree on the southeastern portion, which are suitable habitat for nesting bird species. Nesting birds are protected by California Fish and Game Code §s 3503, 3503.5, and 3800, and by the Migratory Bird Treaty Act, which regulate the take, possession, or destruction of the nest or eggs of any migratory bird or bird of prey. To avoid potential effects to nesting birds, the Project is subject to compliance with MM BIO-2, which restricts construction activities from occurring during nesting bird season. Following compliance with MM BIO-2, the Project would result in a less than significant impact. Therefore, the Project would result in a less than significant impact to nesting birds with mitigation incorporated.

4e) Convert oak woodlands (as defined by the state, oak woodlands are oak stands with greater than 10% canopy cover with oaks at least 5 inch in diameter measured at 4.5 feet above mean natural grade) or other unique native woodlands (juniper, Joshua, southern California black walnut, etc.)?	☐	☐	☐	☒

There are no oak trees or other unique native woodlands within the Project site; see Response 4a. Therefore, the Project would not convert oak woodlands or other unique native woodlands. No impact would occur.

4f) Conflict with any local policies or ordinances protecting biological resources, including Wildflower Reserve Areas (L.A. County Code, Title 12, Ch. 12.36), the Los Angeles County Oak Tree Ordinance (L.A. County Code, Title 22, Ch. 22.174), the Significant Ecological Areas (SEAs) (L.A. County Code, Title 22, Ch. 102), Specific Plans (L.A. County Code, Title 22, Ch. 22.46), Community Standards Districts (L.A. County Code, Title 22, Ch. 22.300 et seq.), and/or Coastal Resource Areas (L.A. County General Plan, Figure 9.3)?	☐	☐	☒	☐

The Project site is not within a: Wildflower Reserve Area;[17] Significant Ecological Area;[18] Coastal Resource Area;[19] or a Specific Plan.[20] There are no oak trees within the Project site, thus, the Project would not conflict with the County Oak Tree Ordinance.

The Project site is within the Santa Monica Mountains Area Plan Community Standards District (CSD).[21] Review by County staff would ensure the Project complies with CSD standards protecting biological resources. Additionally, the Project is within an area governed by the Santa Monica Mountains North Area Plan (SMMNAP), which is a component of the Los Angeles County General Plan. The SMMNAP covers an unincorporated portion of the Santa Monica Mountains, west of the City of Los Angeles, and north of the Coastal Zone boundary and provides focused policies for the regulation of development and protection of biological resources within the SMMNAP.

SMMNAP's Conservation and Natural Resources Element provides guidelines on how to address several natural resources found within the SMMNAP boundaries. The categories addressing biological resources include open space, biological resources, and tree protection.

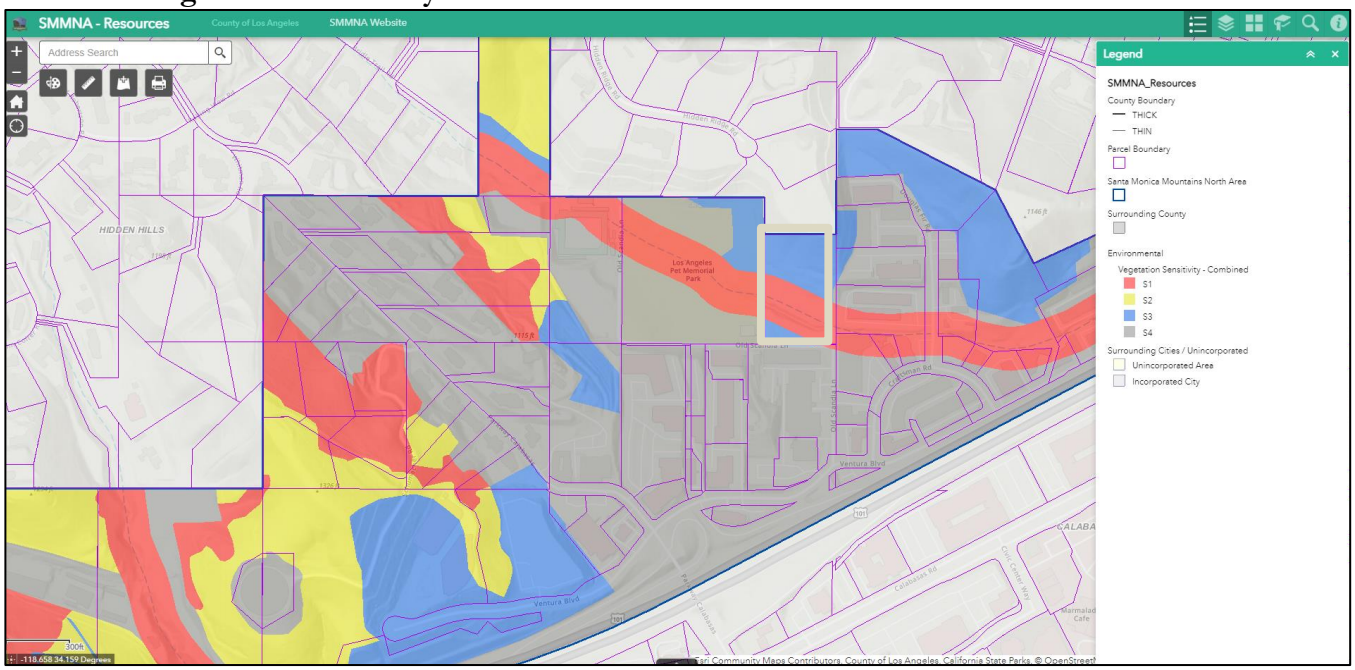
Open Space. The Project site does not fit into any open space descriptions described in this element, therefore no SMMNAP open space guidelines would apply to the Project. No impact would occur.

Biological Resources. The Santa Monica Mountains North Area Resources (SMMNAR) geographic information system reports the Project site has S1 and S3 vegetation sensitivity;[22] see **Exhibit 6: S1 and S3 Vegetation Sensitivity Areas**. S1 vegetation sensitivity denotes an area with the highest biological significance, supporting the most sensitive resources where development is highly restricted. S3 vegetation sensitivity denotes an area with disturbed, exotic and cleared communities. A vegetation sensitivity of S4 is described as supporting existing residential or commercial development, other facilities, or agricultural practices where development is least restricted. There are no S4 communities within the Project site. The site's southern portion around the wetland feature (see Response 4c above) is assigned a vegetation sensitivity of S1. As the Project proposes development within an S1 sensitivity area, a Biological Resources Assessment was

[17] Los Angeles County. *Wildflower Reserve Areas Designated*. http://lacounty-ca.elaws.us/code/coor_title12_ch12.36_sec12.36.020. Accessed 06/15/22.
[18] Los Angeles County. *2035 General Plan: Figure 9.3*. https://planning.lacounty.gov/assets/upl/project/gp_2035_2019-FIG_9-3_significant_ecological_areas.pdf. Accessed 06/15/22.
[19] Ibid.
[20] Los Angeles County Department of Regional Planning. *SMMLCP-NET: Scenic Resources layer*. https://rpgis.isd.lacounty.gov/Html5Viewer/index.html?viewer=SMMLCP_NET.SMMLCP. Accessed 06/15/22.
[21] Ibid.
[22] Los Angeles County Department of Regional Planning. *SMMNA – Resources: Vegetation Sensitivity layer*. https://lacounty.maps.arcgis.com/apps/webappviewer/index.html?id=03cc5bbb6dbe4cb9b03e1d86cb3e539f. Accessed 09/20/22.

prepared; see **Appendix B1**. The Biological Resources Assessment concluded that the Project would not have effects on special-status species, including threatened and endangered species and critical habitat.

Exhibit 6: Vegetation Sensitivity Areas



Tree Protection. The SMMNAP grants protection to trees within the SMMNAP boundaries that requires monitoring during tree removal within the Project site. Since the trees on the Project site are non-native Peruvian pepper trees and do not have high habitat or historical value, no additional polices or mitigation are required. Impacts would be less than significant.

The Project site is not within a Significant Ecological Area; thus, the Project would not require Significant Ecological Area counseling.

The Project would not conflict with the above-mentioned policies and ordinances protecting biological resources. Following compliance with MM BIO-2, a less than significant impact would occur.

4g) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved state, regional, or local habitat conservation plan? ☐ ☐ ☐ ☒

The Project site does not contain wildlife corridors, nursery sites, or natural communities of concern. The Project site not within an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved state, regional, or local habitat conservation plan. No impact would occur.

Mitigation Program

MM BIO-1 Prior to the start of Project activities, the Applicant shall install signs in upland areas adjacent to the culvert structure associated with the drainage feature. The signs shall note that the area is an environmentally sensitive area, and that entry is prohibited.

MM BIO-1 Project activities shall be avoided during nesting bird season (February 1 through August 31), if possible. If unable, prior to construction activities, including vegetation removal, a pre-construction nesting bird survey shall be conducted by a qualified biologist no more than 3 days prior to any construction activities and vegetation removal. If nesting birds are found, an exclusionary buffer shall be established by the qualified biologist. The buffer shall be clearly marked in the field by construction personnel under the qualified biologist's guidance. No construction activities shall be allowed within this zone until the qualified biologist determines the young have fledged or the nest is no longer active.

5. CULTURAL RESOURCES

This section is based on the Cultural Resources Records Search Results for the Trojan Storage Project (BCR Consulting, 2022), which is included in its entirety as **Appendix C: Cultural Resources Records Search**.

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
Would the project:				
5a) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines § 15064.5?	☐	☐	☐	☒

Topographic maps and aerial photographs reviewed as part of the records search conducted for the Project showed portions of the Project site had been subject to previous disturbances related to mechanical excavation, as well as the existence of a building that had been removed by 1985. The Project site is currently vacant and undeveloped. There are no buildings or known historical resources present on the Project site. Therefore, the Project would not cause an adverse change in the significance of a historical resource. No impact would occur.

5b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines § 15064.5?	☐	☒	☐	☐

To identify prior studies and previously recorded historic and prehistoric archaeological sites, as well as built environment resources (including historic districts) within one half-mile of the Project site, multiple sources, including a records search at the South-Central Coastal Information Center (SCCIC) at California State University, Fullerton were examined; see **Appendix C**. The records search indicated that 17 previous studies have been completed resulting in one cultural resource (a prehistoric habitation site designated P-19-1127) being recorded within one half-mile of the Project site; see **Appendix C** Table A. One study (designated LA-2020) assessed the entire Project site for cultural resources in 1990. No cultural resources were identified within the Project site boundaries during this study. The lack of identified prehistoric archaeological resources suggests the Project site is not highly sensitive to prehistoric archaeological remains. Further, because the Project site was previously disturbed, it is unlikely to contain significant historic period archaeological deposits.[23]

The Project site is underlain by artificial fill to depths of approximately 7 to 10 feet below grade.[24] The Project would require basement excavations to depths of approximately 15 to 20 feet below grade,[25] thus, is anticipated to disturb approximately 5 to 10 feet of native soil. Further, while aerial photographs indicated previous disturbances within the Project site boundaries, the extent and severity of the disturbances are not known. Notwithstanding the findings of the records search discussed above and extent of past site disturbance, given the anticipated excavations into native soils, the potential exists for accidental discovery of archaeological resources during ground-disturbing activities. Should archaeological deposits be encountered

[23] BCR Consulting LLC. Cultural Resources Records Search Results for the Trojan Storage Project, Calabasas, Los Angeles County, California (BCR Consulting Project No. KIM2215). August 24, 2022

[24] LGC Geotechnical, Inc. *Supplemental Geotechnical Evaluation, Proposed Self Storage Facility, 5050 Old Scania Lane, Calabasas California*. December 2019.

[25] Ibid.

during ground-disturbing activities, the Project could cause an adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines § 15064.5. As discussed in detail in **Section 4.18: Tribal Cultural Resources**, implementation of measures to mitigate potential impacts to as-yet undiscovered tribal cultural resources is required; see MMs TCR-1 and TCR-2 in **Section 4.18**. MM TCR-1 and MM TCR-2 require the retention of a qualified archaeologist and monitor and outlines specific instructions if resources are found. If resources are found, the archaeologist would temporarily halt or redirect work to permit the sampling, identification, and evaluation of the artifacts and resources, as appropriated. If resources are significant, the archaeologist would determine appropriate actions, in cooperation with the County and Project applicant. With implementation of MM TCR-1 and TCR-2, the Project's potential impacts concerning an adverse change in the significance of an archaeological resource would be reduced to less than significant.

5c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

The Project is not anticipated to destroy a unique paleontological resource or site or unique geologic feature directly or indirectly. BCR Consulting conducted a records search of the Project site resources within one half-mile; see **Appendix C: Cultural Resources Records Search**. No paleontological resources were identified within the Project site boundaries during this study. Because no paleontological resources were identified within the Project site, implementation of the Project would not be expected to cause direct or indirect impact to a paleontological resource or unique geologic feature. Therefore, impacts on paleontological resources would not occur. The lack of identified paleontological resources suggests the Project site is not highly sensitive to prehistoric remains. Further, because the Project site was previously disturbed, it is unlikely to contain significant paleontological deposits.

5d) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

There are no human cemeteries within or adjacent to the Project site. Most Native American human remains are found in association with prehistoric archaeological sites. As discussed previously, the records search conducted for the Project found the Project site is not near identified archaeological resources. However, the Project would require basement excavations to depths of approximately 15 to 20 feet below grade, thus, would disturb approximately 5.0 to 10.0 feet of native soil. If previously unknown human remains are discovered during the Project's ground-disturbing activities, a substantial adverse change in the significance of such a resource could occur. If human remains are found, those remains would require proper treatment in accordance with applicable laws, including State of California Health and Safety Code (HSC) §§ 7050.5-7055 and PRC § 5097.98 and § 5097.99. HSC §§ 7050.5-7055 describe the general provisions for treatment of human remains. Specifically, HSC § 7050.5 prescribes the requirements for the treatment of any human remains that are accidentally discovered during excavation of a site. HSC § 7050.5 also requires that all activities cease immediately, and a qualified archaeologist and Native American monitor be contacted immediately. As required by State law, the procedures set forth in PRC § 5087.98 would be implemented, including evaluation by the County Coroner and notification of the NAHC. The NAHC would designate the "Most Likely Descendent" of the unearthed human remains. If human remains are found during excavation, excavation would be halted near the find and any area that is reasonably suspected to overlay adjacent remains shall remain undisturbed until the County Coroner has investigated, and appropriate recommendations have been made for treatment and disposition of the remains. Following compliance with the established regulatory framework (i.e., HSC §§ 7050.5-7055 and PRC § 5097.98 and § 5097.99), the Project's potential impacts concerning human remains would be less than significant, and no mitigation is required.

Mitigation Program

See **Section 18: Tribal Cultural Resources** for MM TCR-1 and MM TCR-2.

6. ENERGY

Would the project:	*Potentially Significant Impact*	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
6a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
6b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Various State and local plans and policies exist to conserve energy and decrease overall per-capita energy usage. In 2002, California established its Renewable Portfolio Standard program with the goal of increasing the annual percentage of renewable energy in the State's electricity mix by the equivalent of at least 1 percent of sales, with an aggregate total of 20 percent by 2017. The California Public Utilities Commission subsequently accelerated that goal to 2010 for retail sellers of electricity (Public Utilities Code § 399.15(b)(1)). Then-Governor Schwarzenegger signed Executive Order S-14-08 in 2008, increasing the target to 33 percent renewable energy by 2020. In September 2009, then-Governor Schwarzenegger continued California's commitment to the Renewable Portfolio Standard by signing Executive Order S-21-09, which directs the CARB under its AB 32 authority to enact regulations to help the State meet its Renewable Portfolio Standard goal of 33 percent renewable energy by 2020. In September 2010, the CARB adopted its Renewable Electricity Standard regulations, which require all the State's load-serving entities to meet this target. In October 2015, then-Governor Brown signed into legislation Senate Bill (SB) 350, which requires retail sellers and publicly owned utilities to procure 50 percent of their electricity from eligible renewable energy resources by 2030. Signed in 2018, SB 100 revised the program's goal to achieve the 50 percent renewable resources target by December 31, 2026, and a 60 percent renewable resources target by December 31, 2030. SB 100 also established a further goal to have an electric grid that is entirely powered by clean energy by 2045. Under the bill, the State cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

The Project's electricity demand is expected to be served by existing Southern California Edison (SCE) electrical facilities.[26] The Project's construction-related electrical demand for construction lighting and equipment is anticipated to be nominal, since most construction equipment would be gas- or diesel-powered. Heavy equipment fuel usage during construction would be temporary and would not require expanded energy supplies or new infrastructure. The Project's operational electrical demand would be minimal for on-site lighting, appliances, and other equipment. The Project's estimated operational electrical demand is approximately 659-megawatt hour (MWh) per year, an increase of 0.001 percent over total usage in Los Angeles County, which would represent a less than significant percent increase compared to the SCE service area's overall demand.[27] The Project would also involve minimal transportation energy usage associated with the estimated 240 daily vehicle trips. Therefore, Project construction and operations would not result in wasteful, inefficient, or unnecessary electricity consumption.

[26] **Appendix A2: Greenhouse Gas Emissions Assessment**.
[27] Ibid.

Southern California Gas Company (SoCalGas) provides natural gas service to the Project area. No construction-related natural gas demand is anticipated for the Project since most construction equipment would be gas- or diesel-powered. The Project's estimated operational natural gas demand is approximately 6,279 therms per year, an increase of 0.0002 percent over total usage in Los Angeles County, which would represent a less than significant percent increase compared to SoCalGas' service area's overall demand.[28] Therefore, Project construction and operations would not result in wasteful, inefficient, or unnecessary consumption of natural gas resources.

Additionally, the Project would be subject to compliance with all building codes in effect at the time of construction, which include energy conservation measures mandated by Title 24 of the California Building Standards Code – Energy Efficiency Standards and the California Green Building Standards. Because Title 24 standards require energy conservation features in new construction (e.g., high-efficiency lighting, high-efficiency heating, ventilating, and air-conditioning (HVAC) systems, thermal insulation, double-glazed windows, and water-conserving plumbing fixtures). California's Building Energy Efficiency Standards are updated on an approximately three-year cycle. The most recent 2022 standards went into effect January 1, 2023. Therefore, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and a less than significant impact would occur, and no mitigation is required.

[28] Ibid.

7. GEOLOGY AND SOILS

This section is based on the Supplemental Geotechnical Evaluation, Proposed Self Storage Facility, 5050 Old Scania Lane, Calabasas California (LGC Geotechnical, Inc, 2019), which is included in its entirety as **Appendix D1: Supplemental Geotechnical Evaluation**, and the Geotechnical Addendum Report, Proposed Self Storage Facility, 5050 Old Scandia Lane, Calabasas, California, (LGC Geotechnical, Inc, 2020), which is included in its entirety as **Appendix D2: Geotechnical Addendum Report**.

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
Would the project:				
7a) 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 active fault trace? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒

The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazard of surface faulting to structures for human occupancy. The Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The Act requires the State Geologist to establish regulatory zones, known as "Alquist Priolo (AP) Earthquake Fault Zones," around the surface traces of active faults and to issue appropriate maps. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back from the fault (typically 50 feet). The Project site is not located within an Alquist-Priolo Earthquake Fault Zone.[29] Additionally, no evidence exists of a known fault within or adjacent to the Project site.[30] Therefore, the Project would not expose people or structures to adverse effects involving rupture of a known earthquake fault. No impact would occur.

ii) Strong seismic ground shaking?	☐	☐	☒	☐

The Project site is located between several active fault zones, including the Chatsworth Fault, Simi Fault, the Santa Susana Fault, the Hollywood Fault, and the Santa Monica Fault. The fault zone nearest the Project site, the Chatsworth Fault, is approximately 5.0 miles to the north.[31] Additionally, Southern California is considered a seismically active region. Therefore, Project implementation could expose people and structures to potential adverse effects involving strong seismic ground shaking. The intensity of ground shaking on the Project site would depend upon the earthquake's magnitude, distance to the epicenter, and geology of the area between the Project site and epicenter. Regulatory controls to address potential seismic hazards would be

[29] California Department of Conservation. (2022). Earthquake Zones of Required Investigation. Retrieved from https://maps.conservation.ca.gov/cgs/EQZApp/app/.
[30] United States Geological Survey (USGS). U.S. Quaternary Faults. https://usgs.maps.arcgis.com/apps/webappviewer/index.html?id=5a6038b3a1684561a9b0aadf88412fcf.
[31] California Department of Conservation. 2022. Fault Activity Map of California. https://maps.conservation.ca.gov/cgs/fam/.

imposed on the Project through the permitting process. Pursuant to County Code Title 26: Building Code and Title 31: Green Building Standards Code, the County has adopted the 2019 California Building Code (CBC), subject to certain amendments and changes, including those that address seismic resistance. CBC design standards correspond to the level of seismic risk in a given location and are intended primarily to protect public safety and secondly to minimize property damage. The Project would be subject to compliance with all applicable regulations in the most recently published CBC standards (as amended by County Code Title 26 and Title 31), which specifies design requirements to mitigate the effects of potential earthquake hazards. Moreover, the Geotechnical Evaluation and Geotechnical Addendum evaluated various geologic and seismic hazards based on site-specific parameters, including strong seismic ground shaking shrinkage and subsidence. The Geotechnical Evaluation and Addendum makes recommendations concerning seismic design parameters, foundations, slabs, and general earthwork and grading, among other factors. The Geotechnical Evaluation and Addendum concludes that the Project appears feasible from a geotechnical standpoint.[32] The Geotechnical Evaluation and Addendum provide recommendations to address seismic and other site conditions, which would be implemented prior to Project development. Following compliance with standard engineering practices, the established regulatory framework (i.e., County Code and CBC), and the Geotechnical Evaluation and Addendum's recommendations, the Project's potential impacts concerning exposure of people or structures to potential adverse effects involving strong seismic ground shaking would be less than significant, and no mitigation is required.

iii) Seismic-related ground failure, including liquefaction and lateral spreading? ☐ ☐ ☐ ☒

Liquefaction is a phenomenon where earthquake-induced ground vibrations increase the pore pressure in saturated, granular soils until it is equal to the confining, overburden pressure. When this occurs, the soil can completely lose its shear strength and enter a liquefied state. For liquefaction to occur, three criteria must be met: underlying loose, coarse grained (sandy) soils, a groundwater depth of approximately 25 feet, and a potential for seismic shaking from nearby large-magnitude earthquakes. Lateral spreading is caused by the accumulation of incremental displacements that develop within liquefied soil.

The Project site is not within a mapped area of liquefaction.[33] However, the Geotechnical Addendum reports that groundwater was encountered at depths ranging from approximately 20 feet (approximate elevation of 941 feet) to 37 feet (approximate elevation of 935 feet) below existing grade during the field evaluation. Groundwater is anticipated to be at an approximate elevation of 941 to 945 feet and may be encountered at higher elevations. The Geotechnical Addendum recommends that design groundwater for permanent conditions be taken as elevation of 949 feet. However, since the site is underlain at shallow depths by Modelo Formation bedrock which is sufficiently dense to prevent liquefaction even if saturated, it does not appear liquefaction poses a hazard to the proposed development.[34]

Additionally, the Geotechnical Evaluation did not identify any potential for lateral spreading or collapse and concluded that subsidence is not anticipated. Therefore, the Project would not cause potential substantial adverse effects involving liquefaction or lateral spreading. A less than significant impact would occur following compliance with standard engineering practices, the established regulatory framework (i.e., County Code and CBC), and the Geotechnical Evaluation and Addendum's recommendations and no mitigation is required.

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[32] LGC Geotechnical, Inc. (2020). Geotechnical Addendum Report, Proposed Self Storage Facility, 5050 Old Scandia Lane, Calabasas, California; see **Appendix D2**.

[33] California State Geoportal. CGS Seismic Hazards Program: Liquefaction Zones, 5050 Old Scandia Lane, Calabasas, California. (https://gis.data.ca.gov/datasets/b70a766a60ad4c0688babdd47497dbad_0/explore?location=34.090390%2C-118.702332%2C9.97

[34] LGC Geotechnical, Inc. (2020). Geotechnical Addendum Report, Proposed Self Storage Facility, 5050 Old Scandia Lane, Calabasas, California; see **Appendix D2**.

iv) Landslides? ☐ ☐ ☒ ☐

Landslides are mass movements of the ground that include rock falls, relatively shallow slumping and sliding of soil, and deeper rotational or transitional movement of soil or rock. The Geotechnical Evaluation concluded no landslides or debris flows are known to exist on or trend into the property. [35] Based on these findings, the Geotechnical Evaluation concludes that the hazards posed by land sliding and debris flows are low.[36] Further, no significant outcrops were noted on the slopes above the site; thus, the hazard posed by rock fall is low.

As part of the Project design, the Project would construct a north facing retaining wall adjacent to the hillside that would reduce the risk of landslides in the event of post-fire instability. A rockfall barrier would also be placed along the hillside to prevent debris and rocks from damaging the proposed structures. Additionally, a concrete V-gutter proposed around the northern and western Project boundaries would capture runoff from the hillside. Therefore, given the proposed Project design features, which would minimize downstream flooding, landslides, and post-fire slope instability risks, , the Project would not cause potential substantial adverse effects involving landslides. A less than significant impact would occur, and no mitigation is required.

7b) Result in substantial soil erosion or the loss of topsoil? ☐ ☐ ☒ ☐

Construction activities such as grading, site stripping, and excavation would potentially result in soil erosion and the loss of topsoil. Grading and excavation proposed by the Project would cut/remove approximately 37,805 CY of existing undocumented fill soils and the potentially compressible portion of alluvium are to be removed and replaced as properly compacted fills. Approximately 1,565 CY would be used to fill the site. Over excavation and alluvial removal and compaction would total 4,000 CY. The difference of approximately 36,240 CY of cut soil material would be exported off-site. Site preparation would include the removal of any engineered structures or improvements, existing vegetation (grass, etc.), surface obstructions, existing debris, and potentially compressible or otherwise unsuitable material.

Grading and earthwork activities during construction would expose soils to potential short-term erosion by wind and water. The Project is required to comply with County Code Title 26 and County Code §12.80.520 for the purpose of preventing soil erosion, and the National Pollutant Discharge Elimination System (NPDES) permitting process for construction activities (e.g., implementation of Best Management Practices [BMPs] through preparation of a Stormwater Pollution Prevention Plan (SWPPP)). Following compliance with the established regulatory framework, the Project's potential impacts concerning soil erosion and loss of topsoil would be less than significant, and no mitigation is required. See also Response 10a.

7c) 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? ☐ ☐ ☒ ☐

As discussed in Response 7aiii, above, liquefaction and landslides are not considered to be a design concern for the Project, and potential for lateral spreading would be low. The Project site includes a north-south slope consisting of highly expansive soils. Project construction would include removal of undocumented fill and highly expansive soils under buildings and replacing with artificial fill consisting of low-expansive soils. This replacement would ensure that Project buildings, drive aisles, and hardscape would be stabilized. Therefore,

[35] Ibid.
[36] Ibid.

the Project is not expected to result in on or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse, and is not expected to create substantial risks to life and property, and impacts are therefore expected to be less than significant.

7d) 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?	☐	☐	☒	☐

The Project site's soil is highly expansive, with Expansion Index (EI) rating ranging from 91 to 113, respectively..[37] The Project would include removal of high-expansion soils underneath building foundations in accordance with standard grading practices and the Geotechnical Evaluation and Geotechnical Addendum's recommendations. Upon completion of these grading practices, Project buildings would be underlain by suitable soil compacted to support multi-story buildings. The Geotechnical Evaluation concluded the Project would not create substantial direct or indirect risks to life or property following proper implementation of geotechnical recommendations. A less than significant impact would occur.

7e) Have soils incapable of adequately supporting the use of onsite wastewater treatment systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒

The Project would connect to existing public sewer system within Old Scandia Lane, thus, would not require onsite wastewater treatment systems. No impact would occur.

7f) Conflict with the Hillside Management Area Ordinance (L.A. County Code, Title 22, Ch.22.104)?	☐	☐	☒	☐

The County's GIS-NET Public map viewer reports that the Project site contains Hillside Management Area (HMA; 25 percent to 50 percent) and HMA (50 percent or greater slope)..[38] Hillside Design Guidelines are contained in County Code Appendix I Chapter 22.104 – Hillside Management Areas..[39] The Hillside Design Guidelines are required for development in HMAs, unless exempted under the Ordinance's provisions. The Project does not fall under the list of development exempted under § 22.104.030 – Permit Required; therefore, a Conditional Use Permit is required. The Project would be required to adhere to the HMA Ordinance and the Hillside Design Guidelines, thus, would be required to implement sensitive and creative engineering, architectural, and landscaping site design techniques. Therefore, a less than significant impact would occur, and no mitigation is required.

[37] LGC Geotechnical, Inc. *Supplemental Geotechnical Evaluation, Proposed Self Storage Facility, 5050 Old Scania Lane, Calabasas California*. December 2019. Page 4

[38] Los Angeles County. ND. GIS-NET Public map viewer. https://rpgis.isd.lacounty.gov/Html5Viewer/index.html?viewer=GISNET_Public.GIS-NET_Public (accessed August 2022).

[39] Los Angeles County Code. ND. Appendix I – Hillside Design Guidelines. https://library.municode.com/ca/los_angeles_county/codes/code_of_ordinances?nodeId=TIT22PLZO_DIV5SPMAAR_CH22.104HIMAAR_APXIHIDEGU.

8. GREENHOUSE GAS EMISSIONS

This section is based on the Air Quality Assessment (Kimley-Horn, 2022), which is included in its entirety as **Appendix A2: Greenhouse Gas Emissions Assessment.**

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
Would the project:				
8a) Generate greenhouse gas (GHGs) emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐

Addressing GHG emissions impacts requires an agency to determine what constitutes a significant impact. Amendments to the State CEQA Guidelines specifically allow lead agencies to determine thresholds of significance that illustrate the extent of an impact and are a basis from which to apply mitigation measures. This means that each agency is left to determine whether a project's GHG emissions would have a "significant" impact on the environment. The guidelines direct that agencies are to use "careful judgment" and "make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate" the project's GHG emissions..[40]

Based upon the criteria derived from State CEQA Guidelines Appendix G, a project normally would have a significant effect on the environment if it would:

- Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, based on any applicable threshold of significance; or
- Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.

South Coast Air Quality Management District Thresholds

The South Coast AQMD formed a GHG CEQA Significance Threshold Working Group to provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. As of the last Working Group meeting (Meeting #15) held in September 2010, the SCAQMD is proposing to adopt a tiered approach for evaluating GHG emissions for development projects where South Coast AQMD is not the lead agency.

With the tiered approach, a project is compared with each tier's requirements sequentially and would not result in a significant impact if it complies with any tier. Tier 1 excludes projects that are specifically exempt from SB 97 from resulting in a significant impact. Tier 2 excludes projects that are consistent with a GHG reduction plan that has a certified final CEQA document and complies with AB 32 GHG reduction goals. Tier 3 excludes projects with annual emissions lower than a screening threshold.

The South Coast AQMD has adopted a threshold of 10,000 metric tons of carbon dioxide equivalent ($MTCO_2e$) per year for industrial projects. During Working Group Meeting #7, it was explained that the industrial projects' threshold was derived using a 90 percent capture rate of a large sampling of industrial

[40] 14 California Code of Regulations, Section 15064.4a

facilities. During Meeting #8, the Working Group defined industrial uses as production, manufacturing, and fabrication activities or storage and distribution (e.g., warehouse, transfer facility, etc.). A threshold of 3,000 $MTCO_2e$ per year for non-industrial projects was proposed but has not been adopted. The South Coast AQMD concluded that projects with emissions less than the screening threshold would not result in a significant cumulative impact. As previously noted, the Project site is within the Santa Monica Mountains North Area Plan (Area Plan). The Project site is designated Rural Commercial and zoned M-1 (Light Manufacturing). The M-1 zone allows for light industry, repair, wholesale, and packaging, including the manufacture, assembly, distribution, and storage of goods that have low nuisance impacts. Although the Project is a light industrial use, this analysis conservatively utilizes the 3,000 $MTCO_2e$ per year threshold to evaluate the Project's potential GHG emissions impacts.

Short-Term Construction Greenhouse Gas Emissions

Project construction activities would generate direct CO_2, N_2O, and CH_4 emissions from construction equipment, transport of materials, and construction workers commuting to and from the Project site. Construction GHG emissions are typically summed and amortized over a 30-year period.[41] Total GHG emissions generated during all construction phases were combined and are presented in **Table 8-1: Construction Greenhouse Gas Emissions**. The CalEEMod outputs are contained within **Appendix A2.** As shown in **Table 8-1**, Project construction-related GHG emissions would total approximately 830.93 $MTCO_2e$ (approximately 27.70 $MTCO_2e$/year when amortized over 30 years). Once construction is complete, construction-related GHG emissions would cease.

TABLE 8-1: CONSTRUCTION GREENHOUSE GAS EMISSIONS

CATEGORY	MTCO2E
2023	449.33
2024	381.60
Total GHG Emission (2023 and 2024)	*830.93*
30-Year Amortized Construction	27.70

Source: CalEEMod version 2020.4.0. Refer to **Appendix A2: Greenhouse Gas Emissions Assessment** for Model Data Outputs.

Long-Term Operational Greenhouse Gas Emissions

Long-term operational GHG emissions would occur over the life of the Project. Direct operational GHG emissions would occur from mobile sources (i.e., Project-generated vehicular traffic), and area sources (e.g., on-site natural gas combustion and landscaping equipment operations). Indirect operational GHG emissions would occur from energy sources, such as off-site generation of electrical power, the energy required to convey water to, and wastewater from the Project, and emissions associated with Project-generated solid waste and any fugitive refrigerants from air conditioning or refrigerators. The Project's operational GHG emissions are summarized in **Table 8-2: Project Greenhouse Gas Emissions**. As shown in **Table 8-2**, Project operational GHG emissions would total 642.62 $MTCO_2e$ annually.

Table 8-2 also indicates the Project's construction and operational GHG emissions combined would total approximately 670.32 $MTCO_2e$ annually, which would remain below the 3,000 $MTCO_2e$ per year threshold.

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

Therefore, the Project's construction and operational GHG emissions would be less than significant, and no mitigation is required.

TABLE 8-2: PROJECT GREENHOUSE GAS EMISSIONS	
EMISSIONS SOURCE	**CO2E EMISSIONS, METRIC TONS/YEAR**
Operational Emissions	
Area	0.31
Energy	151.23
Mobile	346.68
Waste	37.20
Water	107.20
Subtotal Operational Emissions	*642.62*
Amortized Construction Emissions	*27.70*
Total GHG Emissions	**670.32**
Threshold	3,000
Exceeds Threshold?	**No**
Source: CalEEMod version 2020.4.0. Refer to **Appendix A2: Greenhouse Gas Emissions Assessment** for Model Data Outputs.	

8b) Conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases? ☐ ☐ ☒ ☐

SCAG RTP/SCS Consistency

SCAG's RTP/SCS establishes GHG emissions goals for automobiles and light-duty trucks for 2020 and 2035 as well as an overall GHG target for the Project region consistent with both the target date of AB 32 and the post-2020 GHG reduction goals of Executive Orders 5-03-05 and B-30-15.

GHG emissions resulting from development-related mobile sources are the most potent emissions source, and therefore Project comparison to the RTP/SCS is an appropriate indicator of whether the Project would inhibit post-2020 GHG reduction goals promulgated by the State. RTP/SCS goals are used to determine a project's consistency with the planning efforts discussed above. The Project's consistency with the RTP/SCS goals is analyzed in **Table 8-3: Project Consistency with the Regional Transportation Plan/Sustainable Communities Strategy**. As indicated in **Table 8-3**, the Project would comply with the applicable RTP/SCS goals. Further, compliance with applicable State standards would ensure consistency with State and regional GHG reduction planning efforts. Therefore, the Project would not interfere with SCAG's ability to achieve the region's post-2020 mobile source GHG reduction targets. A less than significant impact would occur, and no mitigation is required.

TABLE 8-3: PROJECT CONSISTENCY WITH THE REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY			
SCAG GOALS		COMPLIANCE	
GOAL 1:	Encourage regional economic prosperity and global competitiveness.	Not Applicable:	This is not a project-specific goal. Notwithstanding, the Project would develop a vacant site, which would contribute to regional economic prosperity.
GOAL 2:	Improve mobility, accessibility, reliability, and travel safety for people and goods.	Not Applicable:	The Project is not a transportation improvement project.
GOAL 3:	Enhance the preservation, security, and resilience of the regional transportation system.	Not Applicable:	The Project is not a transportation improvement project.
GOAL 4:	Increase person and goods movement and travel choices within the transportation system.	Not Applicable:	The Project is not a transportation improvement project.
GOAL 5:	Reduce greenhouse gas emissions and improve air quality.	Consistent:	The Project site is in an urban area near existing freeways. The Project's location within an urban area would reduce trip lengths, which would reduce GHG and air quality emissions.
GOAL 6:	Support healthy and equitable communities.	Consistent:	The Project does not exceed the South Coast AQMD's regional or localized thresholds. Based on the Friant Ranch decision, projects that do not exceed the South Coast AQMD's LSTs would not violate any air quality standards or contribute substantially to an existing or projected air quality violation and result in no criteria pollutant health impacts.
GOAL 7:	Adapt to a changing climate and support an integrated regional development pattern and transportation network.	Not Applicable:	This is not a project-specific goal.
GOAL 8:	Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	Not Applicable:	This is not a project-specific goal.
GOAL 9:	Encourage development of diverse housing types in areas that are supported by multiple transportation options.	Not Applicable:	The Project involves development of a self-storage facility and does not include housing.
GOAL 10:	Promote conservation of natural and agricultural lands and restoration of habitats.	Not Applicable:	The Project is not on agricultural lands and does not contain native habitat; see Responses 2.b and 4.b.
Source: Southern California Association of Governments. (2020). *Connect SoCal – The Regional Transportation Plan/Sustainable Communities Strategy*.			

Consistency with the 2022 CARB Scoping Plan

Pursuant to AB 32 requirements, CARB adopted the *Climate Change Scoping Plan* (Scoping Plan) in 2008, which provides a range of GHG reduction actions. CARB's 2022 Scoping Plan sets a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels by 2045 in accordance with AB 1279. The transportation, electricity, and industrial sectors are the State's largest GHG contributors. The 2022 Scoping Plan intends to achieve the AB 1279 targets primarily through zero-emission transportation (e.g., electrifying cars, buses, trains, and trucks). Additional GHG reductions would be achieved through decarbonizing the electricity and industrial sectors.

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

As shown in **Table 8-2**, approximately 77 percent of the Project's GHG emissions would be from energy and mobile sources, which would be further reduced by the 2022 Scoping Plan measures described above. It is noted that the County has no control over vehicle emissions (approximately 54 percent of the Project's total emissions). However, these emissions would decline in the future due to the Statewide measures discussed above, as well as cleaner technology and fleet turnover. Several of the State's plans and policies would contribute to a reduction in the Project's mobile source emissions, including the following:

- CARB's Advanced Clean Truck Regulation: Adopted in June 2020, CARB's Advanced Clean Truck Regulation requires truck manufacturers to transition from diesel trucks and vans to electric zero-emission trucks beginning in 2024. By 2045, every new truck sold in California is required to be zero-emission. The Advanced Clean Truck Regulation accelerates the transition of zero-emission medium-and heavy-duty vehicles from Class 2b to Class 8.

- Executive Order N-79-20: Executive Order N-79-20 establishes the goal for all new passenger cars and trucks, as well as all drayage/cargo trucks and off-road vehicles and equipment, sold in California, to be zero-emission by 2035 and all medium and heavy-duty vehicles to be zero-emission by 2045. It also directs CARB to develop and propose rulemaking for passenger vehicles and trucks, medium-and heavy-duty fleets where feasible, drayage trucks, and off-road vehicles and equipment "requiring increasing volumes" of new ZEVs "towards the target of 100 percent."

- CARB's Mobile Source Strategy: CARB's Mobile Source Strategy takes an integrated planning approach to identify the level of transition to cleaner mobile source technologies needed to achieve all of California's targets by increasing the adoption of ZEV buses and trucks.

While these measures are not directly applicable to the Project, any activity associated with the Project would be required to comply with these measures as adopted. The Project would not obstruct or interfere with efforts to increase ZEVs or State efforts to improve system efficiency. Compliance with applicable State standards (e.g., continuation of the Cap-and-Trade regulation; CARB's Mobile Source Strategy, Sustainable Freight Action Plan, and Advanced Clean Truck Regulation; Executive Order N-79-20; SB 100/renewable electricity portfolio improvements that require 60 percent renewable electricity by 2030 and 100 percent renewable by 2045, etc.,) would ensure consistency with State and regional GHG reduction planning efforts, including the 2022 Scoping Plan. It is also noted that the Project would not convert any Natural and Working Lands (NWL) and/or decrease the State's urban forest carbon stock, which are areas of emphasis in the 2022 Scoping Plan.

The Project does not conflict with the applicable plans that are discussed above and therefore concerning this threshold, the Project would result in a less than significant impact, and no mitigation is required.

Consistency with the Unincorporated Los Angeles County Community Climate Action Plan 2020

The Los Angeles County CAP sets emissions reduction goals, and applies policies, programs, and initiatives to reach them. The CAP identifies several opportunities to reduce GHG emissions through upgrading existing structures, incorporating efficiencies into new buildings, and utilizing alternative modes of transportation. The Project would be consistent with the Los Angeles County CAP by incorporating efficiencies into the proposed buildings through compliance with applicable energy efficiency standards.

The Project would be subject to compliance with all building codes in effect at the time of construction, which include energy conservation measures mandated by Title 24 of the California Building Standards Code – Energy Efficiency Standards and the California Green Building Standards. Because Title 24 standards require energy conservation features in new construction (e.g., high-efficiency lighting, high-efficiency heating, ventilating, and air-conditioning (HVAC) systems, thermal insulation, double-glazed windows, water-conserving plumbing fixtures), these standards indirectly regulate and reduce GHG emissions. California's Building Energy Efficiency Standards are updated on an approximately three-year cycle. The most recent 2022 standards went into effect January 1, 2023.

Further, the Project would be subject to compliance with State Building Code provisions and the County's Climate Action Plan policies, which are intended to reduce GHG emissions. The Project would also be subject to compliance with all applicable South Coast AQMD rules and regulations during construction and operations and would not impede achieving statewide 2030 and 2050 GHG emission reduction targets. Therefore, the Project would not conflict with any applicable GHG reductions plans or policies, and a less than significant impact would occur.

9. HAZARDS AND HAZARDOUS MATERIALS

Would the project:	*Potentially Significant Impact*	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
9a) Create a significant hazard to the public or the environment through the routine transport, storage, production, use, or disposal of hazardous materials?	☐	☐	☒	☐

Any potentially hazardous materials used during Project construction would be handled on-site. This generally includes paints and solvents and other petroleum-based products, usually used for on-site construction equipment and for building exterior finishes. The use or handling of these potentially hazardous materials would be short-term, only during the Project's construction phase. Although these materials could be stored on-site, such storage would be required to comply with Los Angeles County SWPPP regulations. The transport, removal, and disposal of hazardous materials on the Project site would be conducted by a permitted and licensed service provider, consistent with federal, State, and local requirements, including applicable regulations promulgated by the U.S. EPA, the California Department of Toxic Substances Control (DTSC), the California Occupational Safety and Health Administration (Cal/OSHA), Caltrans, the Resource Conservation and Recovery Act, and the Los Angeles County Fire Department (LACFD). Therefore, Project construction activities would not create a significant hazard to the public or the environment through the routine transport, storage, production, use, or disposal of hazardous materials.

The Project proposes approximately 155,900 SF of self-storage space. During operations, the Project would not emit hazardous emissions or involve hazardous or acutely hazardous materials, substances, or waste. The Project could involve the use of materials associated with routine property maintenance, such as janitorial supplies for cleaning purposes and/or herbicides and pesticides for landscaping. However, these uses would not involve the routine transport, use, or disposal of quantities of hazardous materials that could create a significant hazard to the public or environment. The hazardous materials used during operations would be stored, handled, and disposed of in accordance with applicable regulations. Additionally, the proposed Project would be reviewed by LACFD for hazardous material use, safe handling and storage, as appropriate. LACFD would impose Conditions of Approval (COAs) upon the Project to reduce hazardous material impacts. Therefore, following compliance with the regulatory requirements and COAs, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant in this regard, and no mitigation is required.

9b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials or waste into the environment? ☐ ☐ ☒ ☐

The Project site is not identified as a hazardous waste site with either an active or past occurrence.[42],[43],[44] Of the three nearest listed sites on GeoTracker, two are classified as Case Closed and one is classified as Open - Remediation, as follows:

- Rantec Microwave Systems, Inc. (Former): Located approximately 725 feet to the south, with Cleanup Status reported as Open - Remediation;
- Chevron #9-4106 (Former): Located approximately 790 feet to the southwest, with Cleanup Status reported as Completed - Case Closed; and
- Chevron #9-5153: Located approximately 1,100 feet to the southwest, with Cleanup Status reported as Completed - Case Closed.

Although the Rantec Microwave Systems, Inc. site's Cleanup Status is reported as Open – Remediation, it is not considered a recognized environmental condition concerning the Project site given the Rantec property is situated downgradient and 725 feet from Project site.

Additionally, the Project involves the development of a self-storage facility with 1,334 self-storage units, a 2,000 SF office/manager residence, and 27 parking spaces. Although typical hazardous materials associated with light industrial uses may be used during Project operations (e.g., pesticides, oils, fertilizers, cleaning chemicals, etc.) these hazardous materials would not be used in large quantities such that they would create a significant hazard involving the accidental release of these materials. Additionally, hazardous materials storage at the Project site would be prohibited. With adherence to existing regulations, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment; impacts would be less than significant. No mitigation is required.

9c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of sensitive land uses? ☐ ☐ ☒ ☐

There is one sensitive land use within 0.25 mile of the Project site. Belmont Village Senior Living Calabasas at 24141 Ventura Boulevard, Calabasas, CA 91302, is approximately 0.25 mile southwest of the Project site. The proposed use is a self-storage facility, which would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste that would impact nearby sensitive land uses. The types of hazardous materials that would be routinely handled would be limited to cleaners, paints, solvents, and fertilizers and pesticides for site landscaping. Further, the Project would be required to adhere to all applicable federal, State, and regional regulations regarding handling, transport, and disposal of hazardous materials. Therefore, Project impacts would be less than significant, and no mitigation is required.

[42] DTSC EnviroStor. 2022. *Hazardous Waste and Substances Site List.* https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=calbasas (accessed August 2022).

[43] DTSC. 2022. *DTSC's Hazardous Waste and Substances Site List – Site Cleanup (Cortese List).* https://dtsc.ca.gov/dtscs-cortese-list/ (accessed August 2022).

[44] State Water Resources Control Board. 2022. *GeoTracker.* https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=Calabasas (accessed August 2022).

9d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment? ☐ ☐ ☐ ☒

Government Code § 65962.5 refers to the Hazardous Waste and Substances Site List, commonly known as the Cortese List, maintained by the State of California Department of Toxic Substances Control (DTSC). The Cortese List identifies hazardous waste and substance sites including public drinking water wells with detectable levels of contamination; sites with known USTs having a reportable release; and solid waste disposal facilities from which there is a known migration. The Cortese List also includes hazardous substance sites selected for remedial action; historic Cortese sites; and sites with known toxic material identified through the abandoned site assessment program. Review of EnviroStor and GeoTracker databases indicates the Project site is not on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5; see Response 9b. No impact would occur, and no mitigation is required.

9e) For a project located within an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? ☐ ☐ ☐ ☒

The Project site is approximately 9.5 miles southwest of the nearest airport- the Van Nuys Airport, and not within the Van Nuys Airport Influence Area.[45] Therefore, the Project would not result in a safety hazard or excessive noise for people working or residing at the Project site. No impact would occur, and no mitigation is required.

9f) Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan? ☐ ☐ ☐ ☒

The County General Plan Safety Element works jointly with the Operational Area Emergency Response Plan (OAERP), which is prepared by County's Chief Executive Office - Office of Emergency Management (CEO OEM). The OAERP strengthens short and long-term emergency response and recovery capability and identifies emergency procedures and emergency management routes the County. The CEO OEM also prepares the All-Hazards Mitigation Plan, which provides policy guidance for minimizing threats from natural and human-made hazards in the County. The OAERP is the emergency response plan for the unincorporated areas of Los Angeles County. The OAERP strengthens short- and long-term emergency response and recovery capability and identifies emergency procedures and emergency management routes in the County. The All-Hazards Mitigation Plan includes a compilation of known and projected hazards in the County and includes information on historical disasters in the County.[46] General Plan Figure 12.6 indicates that the Project site is not located along any identified disaster routes. Therefore, the Project would not impair implementation of, or physically interfere with, an adopted County emergency response or evacuation plan. No impact would occur.

[45] Los Angeles County. 2020. Airport Influence Area. https://data-lahub.opendata.arcgis.com/datasets/lacounty::airport-influence-area-1/explore?location=34.089515%2C-118.114950%2C9.92 (accessed August 2022).

[46] Los Angeles County. 2022. General Plan 2035, Chapter 12: Safety Element. https://planning.lacounty.gov/assets/upl/project/gp_final-general-plan-ch12_update-20220712.pdf (accessed August 2022).

9g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving fires, because the project is located:

i) within a high fire hazard area with inadequate access? ☐ ☐ ☒ ☐

The Project site is located in a Very High Fire Hazard Severity Zone (VHFHSZ)..[47],[48] The Project has been reviewed by the Los Angeles County Fire Department, which has a list of requirements for projects in this zone for construction, access, water mains, fire flows, and fire hydrants, which include:

- Turning radii of not less than 32 feet and a LACFD approved turning area;
- Fire flows of up to 5,000 gallons per minute at 20 pounds per square inch residual pressure for up to a five-hour duration;
- Fire hydrant spacing shall be 300 feet;
- A LACFD approved automatic sprinkler system

The Project would comply with all applicable LACFD requirements and therefore the Project is not expected to expose people or structures to a significant risk of loss, injury, or death involving fires due to being located in a VHFHSZ, inadequate access, inadequate fire flows, or being located within proximity to land uses that have potential for dangerous fire hazard. Therefore, impacts would be less than significant.

ii) within an area with inadequate water and pressure to meet fire flow standards? ☐ ☐ ☒ ☐

As noted in Response 9a above, the Project would be subject to review by LACFD Fire Prevention Division and compliance with COAs concerning water for required fire flow, fire hydrant locations, fire flow testing, and proving vehicular access to fire hydrants. Therefore, following LACFD review and compliance with COA, the Project would not expose people or structures to a significant risk involving fires, given it would not be in an area where fire flow standards could not be met. A less than significant impact would occur, and no mitigation is required.

iii) within proximity to land uses that have the potential for dangerous fire hazard? ☐ ☐ ☒ ☐

The Project site is vacant and undeveloped. The Project would be an infill development and surrounded by large-lot single-family residential uses to the north, light industrial/manufacturing uses to the south, light industrial and commercial uses to the east, and a pet cemetery to the west. Examples of light industrial uses include materials testing laboratories, assembly of data processing equipment, contractor offices, cabinetry work, machine shops, management services, photocopying services, software publishing/production, engineering/architectural services, and electronic/computer component production.[49] Given their scale and nature, the nearby light industrial uses are not anticipated to elevate the potential for dangerous fire hazards. Therefore, the Project would not expose people or structures to a significant risk involving fires associated with proximity to land uses that have the potential for dangerous fire hazard. A less than significant impact would occur, and no mitigation is required.

[49] Law Insider. ND. Light industrial definition. https://www.lawinsider.com/dictionary/light-industrial. Accessed August 2022.

h) Does the proposed use constitute a potentially dangerous fire hazard? ☐ ☐ ☒ ☐

The Project proposes a self-storage facility with 1,334 self-storage units that would be rented to individuals and businesses. Storage of flammables in the storage space would occur in compliance with the Los Angeles County Fire Department Prevention Bureau, Health Hazardous Materials Division, *Compliance Guideline for Hazardous Wastes and Materials*.[50] Therefore, the proposed Project does not constitute a potentially dangerous fire hazard. A less than significant impact would occur, and no mitigation is required.

[50] Los Angeles County Fire Department. 2019. Compliance Guideline for Hazardous Wastes and Materials. https://fire.lacounty.gov/wp-content/uploads/2019/09/HHMD-Compliance-Guidance-Document-2-1.pdf (accessed September 20, 2022).

10. HYDROLOGY AND WATER QUALITY

This section is based on the Hydrology Report (Adams Steeter Civil Engineers, 2021), which is included in its entirety as **Appendix E1: Hydrology Report**, and the Low Impact Development (LID) Report (Adams Steeter Civil Engineers, 2022), which is included in its entirety as **Appendix E2: Low Impact Development Report**.

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
Would the project:				
10a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☒	☐	☐

Short-Term Construction

The Project's construction-related activities would include excavation, grading, and trenching, which would displace soils and temporarily increase the potential for soils to be subject to wind and water erosion. Construction-related erosion effects would be addressed through compliance with the NPDES program's Construction General Permit. Construction activity subject to this Construction General Permit includes any construction or demolition activity, including, but not limited to, clearing, grading, grubbing, or excavation, or any other activity that results in a land disturbance of equal to or greater than 1.0 acre. Given that the Project would disturb an area greater than 1.0 acre, it would be subject to the Construction General Permit. To obtain coverage under the Construction General Permit, dischargers are required to file with the State Water Board the Permit Registration Documents (PRDs), which include a Notice of Intent (NOI) and other compliance-related documents. The Construction General Permit requires development and implementation of a SWPPP and monitoring plan, which must include erosion-control and sediment-control BMPs that would meet or exceed General Permit-required measures to control potential construction-related pollutants.

County Code Chapter 12.80: Stormwater and Runoff Pollution Control, addresses stormwater and runoff pollution control and is intended to reduce the quantity of pollutants being discharged to receiving waters of the County and the United States. County Code § 12.80.450 specifies that no person shall commence any construction activity for which a permit is required by County Code Title 26 without implementing all stormwater and runoff pollution mitigation measures required by such permit. All BMPs required as a condition of any permit for construction activity granted pursuant to County Code Title 26 must be maintained in full force and effect during the Project's term, unless otherwise authorized by the Director of Public Works (County Code § 12.80.510). Following compliance with NPDES and County Code requirements, the Project's construction-related activities would not violate water quality or waste discharge requirements. A less than significant impact would occur, and no mitigation is required.

Long-Term Operations

Urban stormwater runoff is covered under the municipal permit for Los Angeles County, the NPDES MS4 Permit for stormwater and non-stormwater discharges from the MS4 within the Los Angeles County Flood Control District (LACFCD), Los Angeles County, and 84 incorporated cities within the County's coastal watersheds, except Long Beach (CAS004001, Order No. R4-2012-0175). Each Permittee is required to implement a Planning and Land Development Program pursuant to Part VI.D.7.b for all New Development and Redevelopment projects subject to the Order. The New Development category includes all development

projects equal to 1.0 acre or greater of disturbed area and adding more than 10,000 SF of impervious surface area, among other types of projects. The Project would create more than 10,000 SF of impervious surface area; as such, a Planning and Land Development Program is required. The Planning and Land Development Program must be implemented to minimize pollutant loadings from impervious surfaces such as roof tops, parking lots, and roadways through the use of properly designed, technically appropriate BMPs (including Source Control BMPs such as good housekeeping practices), LID Strategies, and Treatment Control BMPs.

The Project site is currently vacant and undeveloped. The lower two-thirds of the site are relatively level, while the upper one-third slopes to the north. Presently, the Project site drains from the northwest to the southeast, ultimately discharging near the site's southeast corner and Old Scandia Lane. As depicted in **Exhibit 5**, a riverine/drainage feature that collects into Los Angeles County Flood Control District's underground storm drain (i.e., Oakfield Drain Line C) traverses the southern portion of the Project site.[51] Receiving waters include Calabasas Creek and the Los Angeles River.

All development must comply with County Title 12, Chapter 12.84 requirements for a LID, including County Code § 12.84.450, which requires the applicant for any development project to submit a LID plan to the Director for review and approval that provides a comprehensive, technical discussion of how the development project will comply with County Code Chapter 12.84 and the applicable provisions specified in the LID Standards Manual. The LID plan shall be approved prior to issuance of a grading permit for such development project. Further, per County Code § 12.84.460, all grading/site drainage plans for the development shall incorporate the approved LID plan features.

A LID Report (see **Appendix E2**) was prepared per County Code Chapter 12.84 to provide Best Management Practices (BMP) for reducing pollutants in storm water discharges after Project completion. The Project falls under County LID requirements with a classification of a Designated Project given the Project would disturb more than 1.0 acre and add more than 10,000 ft^2 of impervious surface area. The Project proposes a biofiltration system and trench drains and catch basins to capture and treat urban runoff from the site. For stormwater treatment, the Project site has been divided into eight distinct Drainage Management Areas (DMAs) to determine the required stormwater quality design volume (SWODv). DMA's A, B, G, F and H consist of stabilized vegetated pervious areas comprising of a total 1.52 acres. DMA-C consists of buildings C, D, and their surrounding improvements. Runoff from DMA C would discharge into a Filterra bio-filtration system before ultimately discharging into an existing LA County Flood Control 60" RCP storm drain system (i.e., Oakfield Drain Line C) located onsite between buildings A and B. DMA-D consists of building A, the office building and surrounding improvements. Runoff generated from this area would follow similar drainage patterns to DMA-C. Building roof runoff would discharge onto the concrete drive aisle where a 3.0-foot concrete v-gutter would direct the runoff westerly before turning south and discharging into a 110 SF Filterra Bio-scape system located between Building A and the office. Lastly, DMA-E (0.16 acres) consists of the site entrance improvements and the ramp leading up to Building C. Trench drains located at the entrance, by the security gates and at the bottom of the ramp would intercept stormwater runoff from this steep portion of the site and would redirect the runoff to a Filterra bio-filtration system before converging with the runoff from the remaining site and collectively discharging into Oakfield Drain Line C. As required under County Code § 12.84.460, the Project proposes to implement various BMPs, including the structural BMPs (i.e., biofiltration as described above) and various non-structural BMPs; see **Appendix E2**. Notwithstanding, because the LID Report is subject to County review and approval, the Project would be subject to compliance with MM-HYD-1, which requires the applicant for any development project to submit a LID plan to the Director of Public Works for review and approval that provides a comprehensive, technical discussion of how the development project will comply with County Code Chapter 12.84. Following compliance with the

[51]The portion of the open tributary that once traversed the site in a northwest-southeast orientation was replaced in 2020 with a 60-inch underground reinforced concrete pipe (RCP) to extend to the property's western limits.

existing water quality regulatory framework (i.e., NPDES and County Code), including implementation of BMP's, and MM-HYD-1, Project operations would not violate water quality or waste discharge requirements and a less than significant impact with mitigation would occur.

10b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐

The LVMWD provides water (and wastewater) services to the Project site and surrounding communities. The LVMWD relies on four water supply sources: imported potable water (78 percent); recycled water from the Tapia Water Reclamation Facility (TWRF) (22 percent); and, to a lesser extent, groundwater from the Thousand Oaks Area Basin, and surface runoff into the Las Virgenes Reservoir.

As noted above, groundwater from the Thousand Oaks Area Basin is one of LVMWD's water supply sources. This groundwater is only used to supplement the recycled water supplies. Therefore, the Project's potable water demand would not substantially decrease groundwater supplies.

If the Project was to remove an existing groundwater recharge area or substantially reduces runoff that results in groundwater recharge such that existing wells would no longer be able to operate, a potentially significant impact could occur. LVMWD service area overlies portions of multiple groundwater basins (i.e., Thousand Oaks Area, Russel Valley, Malibu Valley, and San Fernando Valley Groundwater Basins).[52] The Project site is in the Los Angeles River Watershed and the San Fernando Valley Groundwater Basin.[53] Currently, LVMWD only operates two groundwater production wells, both in the Thousand Oaks Area Groundwater Basin and both used solely to augment recycled water supplies. Thus, the LVMWD does not currently use the San Fernando Valley Groundwater Basin where the Project site is located. Moreover, four infiltration tests were conducted at the Project site, and the observed infiltration rate was 0 inches/hour for the clay soil present on-site. With that, the likelihood that the Project site under existing conditions serves as an area of groundwater recharge is low. Lastly, the LID Report found that due to low infiltration rates found on the Project site, on-site infiltration is not a viable treatment method for stormwater runoff existing conditions. Given these conditions, site development (i.e., replacing portions of a vacant site with impermeable areas) would not affect groundwater recharge. Since LVMWD only uses groundwater from the Thousand Oaks Area Basin to supplement recycled water supplies, the Project would not interfere substantially with groundwater recharge.

Therefore, the Project would not decrease groundwater supplies or interfere substantially with groundwater recharge. A less than significant impact would occur, and no mitigation is required.

10c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of a Federal 100-year flood hazard area or County Capital Flood floodplain; 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?	☐	☒	☐	☐

[52] 2020 Urban Water Management Plan for Las Virgenes Municipal Water District. 2021. page 6.6. https://www.lvmwd.com/home/showpublisheddocument/13459/637616788962730000.
[53] DWR. ND. Groundwater Basin Boundary Assessment Tool. https://gis.water.ca.gov/app/bbat/ (accessed August 2022).

(ii) Substantially increase the rate, amount, or depth of surface runoff in a manner which would result in flooding on- or offsite?	☐	☒	☐	☐
(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☒	☐	☐
(iv) Impede or redirect flood flows which would expose existing housing or other insurable structures in a Federal 100-year flood hazard area or County Capital Flood floodplain to a significant risk of loss or damage involving flooding?	☐	☒	☐	☐

An approved Hydrology Study is needed to confirm a project's stormwater runoff does not increase from the existing to the proposed condition.[54] For unincorporated areas, the Hydrology Study approval process is conducted by the Land Development Division.

The Hydrology Study was prepared per Los Angeles County Public Works requirements to determine the amount of stormwater runoff generated from the Project site in the existing and proposed conditions. The Hydrology Study was developed using the HydroCalc Calculator (version 1.0.3) and the County of Los Angeles Hydrology Manual. Soil Classification number (#4) and the 50-year rain-depth of approximately 7.3 inches were obtained through the Los Angeles County Public Works Hydrology Map GIS Application. A 25-year storm intensity was used for on-site runoff calculations in conformance with LA County and City of Calabasas guidelines.

Existing Drainage Condition

In its current condition, the Project site is vacant and undeveloped. An existing channel that once traversed the site in a northwest-southeast orientation at southern portion of the property was replaced with an 60-inch underground RCP. The site's peak runoff based on a 25-year storm event is provided in **Table 10-1: Overall Existing Condition Peak Runoff and Volume**.

TABLE 10-1: OVERALL EXISTING CONDITION PEAK RUNOFF AND VOLUME			
DRAINAGE SUB-AREA	AREA (ACRE)	TOTAL RUNOFF – Q25 (CFS)	TOTAL RUNOFF VOLUME – V25 (CF)
Project Site	3.74	9.99	17,439
Source: Hydrology Report (**Appendix E1: Hydrology Report**)			

[54] Los Angeles County Department of Public Works Hydrology Study Approval Process. https://dpw.lacounty.gov/ldd/lddservices/HydrologyStudy.shtml (accessed February 2023).

Proposed Drainage Condition

Project development would consist of improvements for and construction of three self-storage buildings (Buildings "A" through "C"), with their respective "Subareas" (1A through 3C). A two story, at-grade office building (Building "D") would be located near Building "A." A parking lot would be located at the site's southeast corner.

The proposed condition onsite drainage patterns would remain similar to existing conditions; stormwater runoff generated from Subareas 1A and 1B (the hillside undeveloped portions) would be intercepted by a concrete v-gutter located along Building C's northside and would be redirected to the east and west, respectively, to drain inlets which would bypass the biofiltration treatment systems and discharge directly into an 18-inch RCP stub-out. Subareas 1C and 2A, which would make up most of the improved site, would share similar drainage patterns. Buildings A through C would discharge at grade and centered along each drive aisle, concrete v-gutters would convey runoff to the west where drain inlets would intercept the runoff and redirect to the tributary biofiltration systems before converging with the runoff from Subareas 1A and 1B at the existing 18-inch stub-out point of connection. At the site's southeast corner, Subarea 2B would sheet flow south towards Old Scandia Lane where a trench drain at the property line would intercept the runoff redirect to the same storm drain system servicing Subarea 2A.

Offsite run-off and run-on was encountered on the Project site. Subarea 3A consists of a triangular offsite area (0.07 acres) located at the top of the site, which generates stormwater run-on. Subarea 3B is another triangular area (0.14 acres) located at the site's northwest corner that is considered within the site boundary but discharges offsite due to the natural sloping nature of the hillside. Though the discharge is offsite, it would remain tributary and is accounted for in the existing 60-inc LACFCD storm drain system. The final offsite discharge is associated with Subarea 3C where a narrow strip (0.03 acres) of landscaping along the west side of Building A would flow south and discharge onto Old Scandia Lane via a parkway drain.

Proposed Condition Peak Flow:

The proposed on-site peak runoff and volume corresponding to each individual drainage Sub-areas (1A through 3C) and the overall site based on the 25-year storm event is provided by the Proposed Condition Hydrology Map and hydrologic calculations in **Appendix E1** Section II. The calculated peak flows for individual Sub-areas are summarized in **Table 10-2: Proposed Condition Individual Subarea Peak Runoff and Volumes**.

TABLE 10-2: PROPOSED CONDITION INDIVIDUAL SUBAREA PEAK RUNOFF AND VOLUMES			
DRAINAGE SUB-AREA	AREA (ACRE)	TOTAL RUNOFF – Q25 (CFS)	TOTAL RUNOFF VOLUME – V25 (CF)
1A		1.56	2,472
1B	0.75	2.21	3,499
1C	1.12	3.85	23,258
2A	0.97	3.33	19,828

2B	0.2	0.66	3,340
3A	0.07	0.21	327
3B	0.14	0.41	653
3C	0.03	0.09	140
Source: Hydrology Report (**Appendix E1**)			

Conclusion:

The results from the Hydrology Study utilizing HydroCalc software provided by Los Angeles County Department of Public Works demonstrate that the proposed stormwater peak flow from the Project site would be generally higher than the existing condition peak flow, as indicated in **Table 10-1 and 10-2**. The proposed condition peak flow rate would be higher primarily because the Project would increase the site's impervious area causing higher runoff flow rates and higher concentration times. As stated above, the existing condition Q25 runoff was estimated at 9.99 CFS, whereas the proposed condition was estimated at 12.32 CFS, producing an increase of 2.33 CFS. According to LACFD, the Project site runoff pertains to LACFCD Facility: PD 2662/Oakfield Drain System where the confirmed maximum allowable runoff discharge from this site into the existing lateral is 14.46 CFS; thus, the 12.32 CFS is within the allowable discharge rate. Additionally, there are no streams or rivers near the Project site. Therefore, based on Hydrology Study findings, the Project would not substantially alter the site's existing drainage pattern or add impervious surfaces, such that it would substantially increase the rate or amount of surface runoff in a manner which would result in flooding, create/contribute runoff, which would exceed the capacity of existing drainage system, or impede/redirect flood flows. Notwithstanding, because the Hydrology Study is subject to County review and approval, the Project would be subject to compliance with MM-HYD-2, which requires the applicant for any development project to submit to the County of Los Angeles Land Development Division prior to grading permit issuance a Hydrology Study that analyzes the existing and proposed Project conditions to determine the impact from stormwater runoff generated and leaving the site. Following compliance with MM HYD-2, the Project would not alter the existing drainage pattern in a manner which would result in substantial flooding, capacity, or substantial additional sources of polluted runoff and a less than significant impact would occur with mitigation incorporated. Refer to Response 10a concerning potential impacts involving erosion.

10d) Otherwise place structures in Federal 100-year flood hazard or County Capital Flood floodplain areas which would require additional flood proofing and flood insurance requirements? ☐ ☐ ☒ ☐

The County Flood Zone Determination Map[55] identifies the Project site as Zones D and X, which are identified as areas in which flood hazards are undetermined, but possible, and areas determined to be outside the 0.2% annual chance floodplain, respectively.[56] However, Federal Emergency Management Agency (FEMA) reports the Project site is not in a flood hazard area.[57] Therefore, the Project would not place structures in Federal 100-year flood hazard or County Capital Flood floodplain areas. A less than significant impact would occur, and no mitigation is required.

☐ ☒ ☐ ☐

[55] Los Angeles County. 2022. Flood Zone Determination Map. Retrieved from: https://apps.gis.lacounty.gov/dpw/m/?viewer=floodzone

[56] Los Angeles County. 2022. FEMA Flood Zone Definitions. Retrieved from: https://pw.lacounty.gov/wmd/floodzone/docs/FZD_Legend.pdf.

[57] Federal Emergency Management Agency. 2022. *FEMA National Flood Hazard Layer Map.* Retrieved from https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd.

10e) Conflict with the Los Angeles County Low Impact Development Ordinance (L.A. County Code, Title 12, Ch. 12.84)?

As discussed above, all development must comply with County Title 12, Chapter 12.84 requirements for a LID, including County Code § 12.84.450, which requires the applicant for any development project to submit a LID plan to the Director for review and approval that provides a comprehensive, technical discussion of how the development project will comply with County Code Chapter 12.84 and the applicable provisions specified in the LID Standards Manual. The LID plan shall be approved prior to issuance of a grading permit for such development project. Further, per County Code § 12.84.460, all grading/site drainage plans for the development shall incorporate the approved LID plan features.

The Los Angeles County LID Ordinance is designed to lessen the adverse impacts of stormwater runoff from development and urban runoff on natural drainage systems, receiving waters and other water bodies; minimize pollutant loadings from impervious surfaces by requiring development projects to incorporate properly designed, technically appropriate BMPs and other LID strategies; and minimize erosion and other hydrologic impacts on natural drainage systems by requiring development projects to incorporate properly designed, technically appropriate hydromodification control development principles and technologies. As required under County Code § 12.84.460, the Project would be subject to the County's LID Ordinance and is required to incorporate BMPs to treat and release off- and on-site runoff. See Response 10a above. Notwithstanding, because the LID Report is subject to County review and approval, the Project is subject to MM HYD-1, which requires the applicant for any development project to submit a LID plan to the Director of Public Works for review and approval that provides a comprehensive, technical discussion of how the development project will comply with County Code Chapter 12.84. Following compliance with MM HYD-1, the Project would not conflict with County Code, Title 12, Chapter 12.84 and a less than significant impact would occur with mitigation incorporated.

10f) Use onsite wastewater treatment systems in areas with known geological limitations (e.g. high groundwater) or in close proximity to surface water (including, but not limited to, streams, lakes, and drainage course)? ☐ ☐ ☐ ☒

The Project would connect to the existing public sewer system, thus, would not require an onsite wastewater treatment system. No impact would occur.

10g) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? ☐ ☐ ☐ ☒

The Project site is not in a flood hazard area.[58] Tsunamis are sea waves that are generated in response to large-magnitude earthquakes. When these waves reach shorelines, they sometimes produce coastal flooding. Seiches are the oscillation of large bodies of standing water, such as lakes, that can occur in response to ground shaking. The Project site is approximately 8.5 miles north/inland of the Pacific Ocean and there are no nearby bodies of standing water. Therefore, tsunamis and seiches do not pose hazards to the Project site. The Project is not within a flood hazard, tsunami, or seiche zone and would not risk the release of pollutants. Therefore, no impact would occur by flood hazard, tsunami, or seiche, and no mitigation is required.

[58] Federal Emergency Management Agency. 2022. *FEMA National Flood Hazard Layer Map*. Retrieved from https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd.

101h) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? ☐ ☒ ☐ ☐

As discussed in Response 10a above, as required under County Code § 12.84.460, the Project proposes to implement various BMPs, including the structural BMPs (i.e., biofiltration) and various non-structural BMPs outlined in the LID Report; see **Appendix E2**. Notwithstanding, because the LID Report is subject to County review and approval, the Project would be subject to compliance with MM HYD-1, which requires the applicant for any development project to submit a LID plan to the Director of Public Works for review and approval that provides a comprehensive, technical discussion of how the development project will comply with County Code Chapter 12.84. Following compliance with the existing water quality regulatory framework (i.e., NPDES and County Code), including implementation of BMP's, and MM HYD-1 the Project would not conflict or obstruct implementation of a water quality control plan and a less than significant impact would occur with mitigation incorporated.

The Sustainable Groundwater Management Act (SGMA) requires governments and water agencies of high and medium priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. The latest basin prioritization project, SGMA 2019 Basin Prioritization, was completed in December 2019. SGMA 2019 Basin Prioritization identified 94 basins/sub-basins as medium or high priority. Both the Thousand Oaks Area Groundwater Basin, which is currently used by LVMWD, and the San Fernando Valley Groundwater Basin where the Project site is located, are very low priority basins.[59] Therefore, the Project would not conflict with or obstruct implementation of a sustainable groundwater management plan. A less than significant impact would occur.

Mitigation Program

MM HYD-2 Prior to issuance of a grading permit, the applicant for the Project shall submit a Low Impact Development Report to the Director of Public Works for review and approval that provides a comprehensive, technical discussion of how the Project will comply with County Code Chapter 12.84 and the applicable provisions specified in the LID Standards Manual. A deposit and fee to recover the costs associated with LID plan review shall be required. Any future project within the planning area shall comply with the recommendations of an approved Hydrology Study and LID Report. These recommendations shall be implemented in the design of a project.

MM HYD-2 Prior to issuance of a grading permit, a State of California registered Civil Engineer shall prepare and submit to the County of Los Angeles Land Development Division a detailed Hydrology Study. The report shall analyze the existing and proposed conditions of the Project to determine the impact to stormwater runoff generated and leaving the site.

[59] State Water Resources Control Board. (2019). Sustainable Groundwater Management Act (SGMA). https://www.waterboards.ca.gov/water_issues/programs/gmp/sgma.html.

11. LAND USE AND PLANNING

Would the project:	*Potentially Significant Impact*	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
11a) Physically divide an established community?	☐	☐	☐	☒

Examples of projects that could physically divide an established community include a new freeway or highway that traverse an established neighborhood. The Project proposes an infill development (i.e., a self-storage facility) surrounded by large-lot single-family residential uses to the north, light industrial/manufacturing uses to the south (beyond Old Scandia Lane), light industrial and commercial uses to the east, and a pet cemetery to the west. The Project does not propose any new streets or other physical barriers, which could physically divide an established community. Therefore, given its nature and scope, the Project would not physically divide an established community. No impact would occur.

11b) Cause a significant environmental impact due to a conflict with any County land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

The Project site is designated as Commercial under the Santa Monica Mountains North Area Plan.[60] The Commercial land use category is intended for general shopping and commercial service needs of area residents and workers, as well as the needs of highway users and tourists. In addition, quiet, non-polluting light industrial uses such as the found in "high-tech" business are also appropriate. The Project proposes a self-storage facility, which is a quiet non-polluting light industrial use. Additionally, the Project would be consistent with Santa Monica Mountains North Area Plan Policies VI-19 and VI-29, as follows:

- *Policy VI-19: Require that light industrial and commercial uses include adequately landscaped open space, and be designed to relate to the surrounding environment.* The slope at the Project site's northern portion would remain undisturbed. Also, the Project would provide landscaping along the Old Sandia Lane frontage.
- Policy VI-29: *Concentrate light industrial, commercial, and office uses adjacent to the Ventura Freeway corridor, and ensure that each project has adequate access, can handle the traffic, and is accessible to essential services, with appropriate site design to enhance community character.* The Project site is situated north of the 101 Freeway and Ventura Boulevard. Also, the Project is an infill development with light industrial/manufacturing uses to the south, light industrial and commercial uses to the east, and a pet cemetery to the west. Therefore, development of the proposed self-storage facility would be compatible with the area's existing development pattern.

The Project site is zoned M-1 (Light Manufacturing). The M-1 Zone allows for light industry, including storage of goods that have low nuisance impacts. The Project proposes a self-storage facility with and office/residence. Self-storage facilities are an allowed use in the M-1 Zone subject to a CUP; see County Code § 22.22.0110 – 22.22.030. The Project would be subject to compliance with the land use regulations for the M-1 Zone (County Code § 22.22.0110 – 22.22.030) and for self-storage facilities (County Code § 22.140.560 - Self-Service Storage Facilities). Additionally, the Santa Monica Mountains Community Standards District (CSD) requirements specify that any project with over 5,000 CY of grading requires a CUP (County Code §

[60] Santa Monica Mountains North Area Plan. 2021. https://planning.lacounty.gov/assets/upl/project/smmnap_final-plan.pdf.

22.44.133.D.4.b). Project construction requires approximately 39,370 CY of earthwork (approximately 37,805 CY of cut and 1,565 CY of fill), with a net export of approximately 36,240 CY. The Project requires more than 5,000 CY of grading, thus, requires a CUP for this activity also. The County will review the Project to verify consistency with the applicable policies and land use regulations. Therefore, the Project would not cause a significant environmental impact due to a conflict with the relevant land use policies and land use regulations. A less than significant impact would occur, and no mitigation is required.

11c) Conflict with the goals and policies of the General Plan related to Hillside Management Areas or Significant Ecological Areas?	☐	☐	☒	☐

The Project site is not located in a Significant Ecological Area.[61] Additionally, Hillside Management Areas (HMAs) are defined as areas with 25 percent or greater natural slopes.[62] The County's GIS-NET Public map viewer reports that the Project site contains Hillside Management Area (HMA; 25 percent to 50 percent) and HMA (50 percent or greater slope); see Response 7f above. Compliance with the County's regulatory requirements for HMAS will be verified through the Project's entitlement review process. Therefore, the Project would not conflict with the General Plan goals and policies related to HMAs.

[61] Los Angeles County Department of Regional Planning – Significant Ecological Areas. Available at: https://databasin.org/datasets/59c2b2bbe6e5499abfca5d4e1a5b95c1/. Accessed August 2022.

[62] Hillside Management Area (HMA) Ordinance. Available at: https://planning.lacounty.gov/hma#:~:text=Hillside%20Management%20Areas%20(HMAs)%20are,Guidelines%20is%20optional%20but%20encouraged. Accessed August 2022.

12. MINERAL RESOURCES

Would the project:	*Potentially Significant Impact*	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
12a) 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?	☐	☐	☐	☒
12b) 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?	☐	☐	☐	☒

The Surface Mining and Reclamation Act of 1975 (SMARA) requires classification of land into Mineral Resource Zones (MRZs) according to the area's known or inferred mineral potential. SMARA was adopted to encourage the production and conservation of mineral resources, prevent or minimize adverse effects to the environments, and protect public health and safety.

The County utilizes the California Geological Survey, to identify regionally significant aggregate resources deposits. These aggregate resource deposits are designated as MRZs. Four major MRZs are identified in, or partially within the unincorporated areas and are shown in General Plan Table 9.7: Little Rock Creek Fan, Soledad Production Area, Sun Valley Production Area, and Irwindale Production Area. The Project site is not located in an area identified as a having known mineral resources.61F[63] Therefore, the Project is not expected to result in the loss of a locally important mineral resource site and would have no impact concerning mineral resources.

[63] Los Angeles County. General Plan 2035, Page 150. Available at: https://planning.lacounty.gov/assets/upl/project/gp_final-general-plan.pdf. (accessed August 2022.)

13. NOISE

Would the project result in:	*Potentially Significant Impact*	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
13a) 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 County General Plan or noise ordinance (Los Angeles County Code, Title 12, Chapter 12.08), or applicable standards of other agencies?	☐	☐	☒	☐

Construction

Construction noise represents a short-term impact on ambient noise levels. Noise generated by equipment for demolition and construction equipment, including trucks, graders, bulldozers, concrete mixers and portable generators can reach high levels. Construction activities on the project site would expose existing noise-sensitive uses to increased noise levels. In typical construction projects such as the proposed project, the loudest noise generally occurs during demolition and grading activities because they involve the largest equipment. Typical hourly average construction-generated noise levels are approximately 74 to 88 dBA measured at a distance of 50 feet from the site during busy construction periods.[64]. Other primary sources of acoustical disturbance would be due to random incidents, which would last less than one minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts).

The Project could expose nearby sensitive receptors to elevated noise levels during Project construction. However, the Project would generally disperse construction noise throughout the site and would not be concentrated at the nearest point to sensitive receptors. Further, the applicant would comply with County Code § 12.08.440, Construction Noise, Section A, which prohibits construction activity between the hours of 7:00 pm and 7:00 am daily, or at any time on Sundays and legal holidays. In addition, the applicant must comply with County Code § 12.08.440, Construction Noise, Section B, Noise Restrictions at Affected Structures, and Section C, which specifies that all mobile or stationary internal-combustion-engine powered equipment or machinery be equipped with suitable exhaust and air-intake silencers in proper working order. Therefore, the Project's construction noise impacts would be less than significant, and no mitigation is required.

Operations

The noise-sensitive receptors nearest the Project site are the single-family residential uses located approximately 485 feet (148 meters) to the north. Typical noise sources associated with the Project that would potentially impact these nearby noise-sensitive receptors include stationary noise equipment (i.e., air conditioning equipment for the office and manager's residence); activities associated with loading/unloading storage items; parking areas (i.e., car door slamming, car radios, engine start-up, and car pass-by); and off-site

[64] Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018.

traffic noise. However, given the nature of the proposed Project (a self-storage facility with infrequent on-site activity), noise levels from on-site noise sources are anticipated to be minimal and would not result in noticeable change in the ambient noise environment. In addition, based on the Inverse Square Law for sound propagation,[65] noise levels emanating from the Project site would be negligible at the nearest noise-sensitive receptors (the single-family residential uses located approximately 485 feet to the north) and intervening topographic features (e.g., a large hill/berm, elevation changes, and mature vegetation and groundcover) would further reduce the Project's noise levels. Thus, the Project's operational noise would not exceed County Code noise standards. A less than impact would occur, and no mitigation is required.

13b) Generation of excessive groundborne vibration or groundborne noise levels? ☐ ☐ ☒ ☐

Project construction can generate varying degrees of groundborne vibration, depending on the construction procedure and the construction equipment used. Operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. Ground-borne vibrations from construction activities rarely reach levels that damage structures. The nearest off-site structures are located over 25 feet from the Project site and would not experience vibration levels in exceedance of established vibration standards.[66] The Project would not require pile driving. Further, the Project would comply with relevant County Code standards relating to construction noise impacts; therefore, impacts would be less than significant, and no mitigation is required.

13c) 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 Project site is approximately 9.5 miles southwest of the nearest airport- the Van Nuys Airport, and not within the Van Nuys Airport Influence Area.[67] Therefore, Project implementation would not expose people residing or working in the Project area to excessive airport-related noise levels. No impact would occur.

[65] Yamaha Corporation, *Inverse Square Law: What is it?* accessed August 8, 2022, https://uc.yamaha.com/insights/blog/2020/march/inverse-square-law-what-is-it/

[66] Per the Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual* (September 2018), vibration levels beyond 25 feet would not exceed the most stringent damage criterion of 0.12 inches-per-second PPV (in/sec PPV) for buildings extremely susceptible to vibration damage.

[67] Los Angeles County Airport Land Use Commission, *Van Nuys Airport – Airport Influence Area,* May 2003.

14. POPULATION AND HOUSING

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
Would the project:				
14a) 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)?	☐	☐	☒	☐

The Project proposes a self-storage facility with a 2,000 SF office/manager's residence, which would induce nominal population growth (approximately three persons).[68] The Project is not expected to induce substantial unplanned population growth or cause exceedances to local or regional population projections. Therefore, a less than significant impact would occur, and no mitigation is required.

14b) Displace substantial numbers of existing people or housing, especially affordable housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

The Project site is vacant and undeveloped. Therefore, the Project would not displace existing people or housing or require construction of replacement housing elsewhere. No impact would occur.

[68] Assuming 2.80 persons per household (California Department of Finance. (2022). *E-5 Population and Housing Estimates for Cities, Counties and the State — January 1, 2021-2022. Sacramento, California, May 2022*).

15. PUBLIC SERVICES

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
15a) Would the project create capacity or service level problems, or result in substantial adverse physical impacts associated with the provision of 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:				
Fire protection?	☐	☐	☒	☐

The LACFD provides fire protection and paramedic services to the Project site. The LACFD has 174 fire stations that serve over 4,000,000 residents across the County.[69] The fire stations nearest the Project site are Station No. 68 located at 24130 Calabasas Road, approximately 0.38 miles to the south, and Station No. 125 located at 5215 Las Virgenes Road, approximately 2.73 miles to the west. The LACFD uses national guidelines of a five-minute response time for the first arriving unit for fire and EMS responses and eight minutes for the advanced life support unit in urban areas.

The Project site is in a VHFHSZ; see Response 9gi. The Project proposes a self-storage facility with an office/manager's residence on a currently vacant site, which would induce nominal population growth (approximately three persons); see Response 14a. Therefore, the Project would nominally increase demand for fire protection and emergency medical services. However, the Project is an infill development site surrounded by large-lot single-family residential uses to the north, light industrial/manufacturing uses to the south, light industrial and commercial uses to the east, and a pet cemetery to the west. The Project area already receives LACFD fire protection and emergency medical services. Additionally, the Project would be subject to review by the LACFD Fire Prevention Division, which would verify the Project's compliance with County Code Title 22: Fire Code and LACFD COA concerning access (e.g., building locations, fire lanes, walking paths, turning radii, and gate access) and water (e.g., required fire flow, fire hydrant locations, fire flow testing, and proving vehicular access to fire hydrants). The Project does not propose, and would not create a need for, new/physically altered fire protection facilities to maintain acceptable service ratios/response times. Therefore, the Project would not result in adverse physical impacts associated with such facilities. Given the Project's nature and scope, and requirements to comply with County regulations, a less than significant impact would occur concerning fire protection facilities, and no mitigation is required.

[69] Los Angeles County Fire Department. *2017-2021 Strategic Plan*. https://fire.lacounty.gov/wp-content/uploads/2019/09/LACoFD-Strategic-Plan-2017-2021.pdf. Accessed 6/21/22.

Sheriff protection? ☐ ☐ ☒ ☐

The Project proposes a self-storage facility with an office/manager's residence, which would induce nominal population growth (approximately three persons); see Response 14a. Therefore, the Project would nominally increase demand for police protection services. However, the Project is an infill development site surrounded by large-lot single-family residential uses to the north, light industrial/manufacturing uses to the south, light industrial and commercial uses to the east, and a pet cemetery to the west. The Project area already receives police protection services from the Sheriff's Department. Through the County's Site Plan Review process, the Project would be reviewed concerning access and other safety measures, which would enhance the Project's police protection. The Project does not propose, and would not create a need for, new/physically altered police protection facilities to maintain acceptable service ratios/response times. Therefore, the Project would not result in adverse physical impacts associated with such facilities. Given the Project's nature and scope, and requirements to comply with County regulations, a less than significant impact would occur concerning police protection facilities, and no mitigation is required.

Schools? ☐ ☐ ☒ ☐

The Project site is located within the Las Virgenes Unified School District (LVUSD) which provides educational services for students in pre-kindergarten through 12th grade. LVUSD consists of 8 elementary schools, 3 middle schools, and 2 high schools that served approximately 11,300 students during the 2021-2022 school year.[70] The Project proposes a self-storage facility with an office/manger's residence, which could induce nominal student population growth. The Project's student population growth, if any, could nominally increase the demand for school facilities/services. However, the Project would be subject to payment of school impact fees in accordance with Senate Bill 50. Pursuant to Government Code § 65995(3)(h), "payment of statutory fees is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use or development of real property…" The Project does not propose, and would not create a need for, new/physically altered school facilities to maintain acceptable service ratios/standards. Therefore, the Project would not result in adverse physical impacts associated with such facilities. Given the Project's nature and scope, a less than significant impact would occur concerning schools, and no mitigation is required.

Parks? ☐ ☐ ☒ ☐

See **Section 16: Recreation**.

Libraries? ☐ ☐ ☒ ☐

The Calabasas Library is located at 200 Civic Center Way, approximately 0.34 miles southeast of the Project site. The Project proposes a self-storage facility with an office/manager's residence, which would induce nominal population growth (approximately three persons), and could generate nominal demand for library facilities/services. Additionally, the Project does not propose, and would not create a need for, new or physically altered library facilities to maintain acceptable service ratios/standards. Therefore, the Project would not result in adverse physical impacts associated with such facilities. Given the Project's nature and scope, a less than significant impact would occur concerning libraries, and no mitigation is required.

[70] Las Virgenes Unified School District. *Get to Know LVUSD.* https://www.lvusd.org/Page/86. Accessed 6/22/22.

Other public facilities? ☐ ☐ ☐ ☒

The Project does not propose, and would not create a need for, other new or physically altered public facilities to maintain acceptable service ratios/standards. Therefore, the Project would not result in adverse physical impacts associated with such facilities. Given the Project's nature and scope, no impact would occur concerning other public facilities.

16. RECREATION

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
16a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
16b) Does the project include neighborhood and regional parks or other recreational facilities or require the construction or expansion of such facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒
16c) Would the project interfere with regional trail connectivity?	☐	☐	☐	☒

The County's standard for the provision of local parkland is 4.0 acres per 1,000 residents in unincorporated areas, and 6.0 acres of regional parkland per 1,000 residents in total County.[71] The Project proposes one self-storage facility with an office/manager's residence, which would induce nominal population growth (approximately three persons); see Response 14a. Based on the Project's nominal population growth and the County's standards for the provision of local and regional parkland, the Project would generate a very nominal demand for local parkland and regional parkland. The Project's nominal population growth could nominally increase the use of existing recreational facilities. Additionally, this nominal population growth would only nominally increase use of existing facilities and would not result in an accelerated substantial physical deterioration of an existing recreational facility. The Project does not include neighborhood or regional parks, or other recreational facilities or require the construction or expansion of such facilities. No adverse physical effect on the environment would occur in this regard. Therefore, the Project would result in a less than significant impact concerning parkland and recreational facilities, and no mitigation is required.

[71] County of Los Angeles. 2017. Park Design Guidelines and Standards. https://file.lacounty.gov/SDSInter/dpr/1029701_ParkDesignGuideline2017.pdf.

17. TRANSPORTATION

This section is based on the Trojan Calabasas Self-Storage Warehouse Project Traffic Study (RK Engineering Group, Inc., 2021), which is included in its entirety (see **Appendix F1: Traffic Study**) and was reviewed and approved by the County (see **Appendix F2: VMT County Approval**).

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
Would the project:				
17a) Conflict with an applicable program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐

Transit Facilities

Transit service to the Project area is provided by LA Metro, which serves the greater Los Angeles metropolitan area. The Project would be served by the existing transit system. The Project's population growth would be nominal (approximately three persons, see Response 14a), thus, the Project would only nominally increase the demand for public transit services. Given its nature and scope, the Project would not conflict with a program plan, ordinance, or policy addressing transit. Therefore, a less than significant impact would occur, and no mitigation is required.

Bicycle Facilities

According to LA County Bikeways Map,[72] there are no designated bike routes near the Project site. Given its nature and scope, the Project would not conflict with a program plan, ordinance, or policy addressing bicycle facilities. Therefore, a less than significant impact would occur, and no mitigation is required.

Pedestrian Facilities

An approximately 11.0-foot area with a sidewalk and landscaping with trees is provided along the Project site's Old Scandia Lane frontage. The Project would provide pedestrian access via the primary entrance proposed on Old Scandia Lane. The Project would not conflict with a program plan, ordinance, or policy addressing pedestrian facilities. Therefore, a less than significant impact would occur, and no mitigation is required.

17b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?	☐	☐	☒	☐

Project Trip Generation

Trip generation represents the amount of traffic that is attracted and produced by a development. The Project's trip generation is based upon the specific land uses that have been planned for this development. Trip generation is typically estimated based on the trip generation rates from the latest Institute of Transportation Engineers (ITE) Trip Generation Manual. Because the Trip Generation Manual that was used in the Traffic Study (i.e., 10th Edition, 2017) was superseded by the subsequently released version (i.e., 11th

Edition, 2021), the Project's trip generation was forecast using the trip generation rates from each edition. As shown in **Table 17-1: Project Trip Generation**, based on 10th Edition ITE trip generation rates, the Project is forecast to generate approximately 240 daily trips, which include approximately 18 AM peak hour trips and approximately 26 PM peak hour trips. As also shown in **Table 17-1**, based on 11th Edition ITE trip generation rates, the Project is forecast to generate approximately 240 daily trips, which include approximately 16 AM peak hour trips and approximately 22 PM peak hour trips. As shown in **Table 17-1**, there is no difference in the Project's forecast daily trips when using either edition of the Trip Generation Model- both would generate 240 daily trips.

TABLE 4-17-1: PROJECT TRIP GENERATION

LAND USE (ITE CODE)	QUANTITY	UNITS	AM PEAK HOUR			PM PEAK HOUR			DAILY
			In	Out	Total	In	Out	Total	
ITE 10TH EDITION TRIP GENERATION RATES & VOLUMES[1]									
Mini Warehouse/ Self-Storage (Code 151) Rates	-	100 Storage Units	0.71	0.68	1.39	0.98	0.98	1.95	17.96
Mini Warehouse/Self-Storage Volumes	13.34	100 Storage Units	9	9	18	13	13	26	240
ITE 11TH EDITION TRIP GENERATION RATES & VOLUMES[2]									
Mini Warehouse/ Self-Storage (Code 151) Rates	-	100 Storage Units	0.620	0.593	1.210	0.840	0.840	1.680	17.960
Mini Warehouse/ Self-Storage (Code 151) Volumes	13.34	100 Storage Units	8	8	16	11	11	22	240

Notes:
1. **Appendix F1: Traffic Study**.
2. 2021 ITE Trip Generation Manual (11th Edition).

Vehicle Miles Traveled Analysis

State CEQA Guidelines § 15064.3 codifies the change from Level of Service to vehicle miles traveled (VMT) as a metric for transportation impact analysis. Pursuant to Senate Bill (SB) 743, VMT analysis is the primary method for determining CEQA impacts. The State of California Office of Planning and Research (OPR) developed "screening thresholds" to quickly identify when a project should be expected to cause a less than significant impact without conducting a detailed study.[73] Thus, lead agencies may screen out VMT impacts using project size, whether a project site is in a low VMT area, and whether a project is in a high-quality transit area ("HQTA").

The County of Los Angles has adopted their own transportation impact analysis guidelines (Los Angeles County Public Works Transportation Impact Analysis Guidelines (Guidelines), July 23, 2020) to provide recommendations in the form of thresholds of significance and methodology for identifying VMT-related impacts. The Project is subject to a VMT analysis and is subject to compliance with the recommendations and practices described in the Guidelines.

[73] State of California Office of Planning and Research, *Technical Advisory on Evaluating Transportation Impacts in CEQA*, December 2018.

The County has developed a VMT analysis tool to evaluate VMT impacts for projects. The VMT tool has input parameters for the following land use types:

- Residential – Single Family Housing;
- Residential – Multifamily Housing;
- Residential – Affordable Housing;
- Office – General Office;
- Office – Medical Office;
- Retail – Shopping Center, Restaurant, Services;
- Industrial – Warehousing;
- Industrial – Light Industrial; and
- Custom Land Use.

Since the Project consists of self-storage use, it does not fall into any of the above categories. The use most similar to the Project is Industrial - Warehousing. However, a self-storage use is vastly different than a warehouse use, as a self-storage use does not generate significant truck traffic or many employees. For instance, the Project is anticipated to have only one employee that would be required to live onsite in the proposed manager's residence. The remainder of the Project's traffic volume would be attributed to the customer visits when bringing or removing items from the storage units. This is also reflected in the Project's relatively low trip generation, as previously shown in **Table 17-1,** which shows the Project to generate approximately 240 daily trips.

Another tool for VMT analysis is the Southern California Association of Governments (SCAG) traffic analysis model. However, use of the SCAG model may not be appropriate for a small self-storage type project generating a low number of trips since the SCAG model evaluates larger traffic analysis zones (TAZ) instead of individual parcels. Additionally, the type of the proposed land use (self-storage), is operationally much different than the generic and general land uses which the SCAG model is based on. The land uses contained in the SCAG model are broken down into general uses such as retail, residential, employment, etc. A self-storage use is considered different than a general retail or even employment use in terms of traffic generation and VMT, since it does not have many employees and the activities and traffic generation are much less than a general retail or office use. Hence, to address the Project's VMT impact, a qualitative analysis has been conducted.

The Project has been qualitatively evaluated for VMT based on two metrics: Employee VMT; and Total VMT.

Employee VMT: As previously noted, the Project is expected to have only one employee that would be required to live onsite in the manager's residence. The remainder of the Project's traffic volume would be attributed to the customer visits when bringing or removing items from the storage units. Therefore, the Project screens out for Employee VMT, since there would be zero to nominal employee-related VMT for the Project.

Total VMT: The goal of the VMT and new CEQA criteria is to promote local-serving uses and discourage uses that result in longer vehicles miles and travel routes. It is on this basis that generally local-serving retail uses are screened out of requiring a VMT analysis for most part. On the same basis, the proposed self-storage use can be expected to have very low VMT, if not actually reduce existing local VMTs due to the following:

- Self-storage uses are generally designed and built to serve the local community and hence fall into the local-serving land use type.

- As in the case of any self-storage use, the customers that would utilize this self-storage can all be expected to live nearby. Users would typically not be living in distant locations and have their items in a storage at the Project site in Calabasas. This new self-storage use would provide a better and closer alternative for nearby residents and businesses for storing their items, potentially reducing existing travel routes and trip lengths.

- **Appendix F1** Exhibit 5-1 shows the location of existing self-storage facilities in the Project area. As shown in **Appendix F1** Exhibit 5-1, currently numerous self-storage facilities operate near the Project site. Therefore, the Project is not introducing a new use in the area, which could be viewed as a destination and attract patrons from distant areas. Instead, the Project would be one of many existing self-storage facilities serving the area. Additionally, there are similar land uses surrounding the Project site.

Therefore, the Project would not conflict with State CEQA Guidelines § 15064.3(b). A less than significant transportation impact concerning VMT would occur, and no mitigation is required.

17c) Substantially increase hazards due to a road design feature (e.g., sharp curves) or incompatible uses (e.g., farm equipment)? ☐ ☐ ☒ ☐

The Project does not propose any roadway improvements. The Project's ingress and egress, interior circulation elements, and improvements would be designed in conformance with County development and design standards approved by LACFD. Project circulation would be designed and constructed to meet County requirements for minimum widths, corner radii, etc. The proposed Project does not include the use of any incompatible vehicles or equipment on-site, such as farm equipment, that would result in a potential significant traffic safety hazard. Therefore, the Project would not increase hazards due to a road design feature or incompatible uses. Impacts would be less than significant, and no mitigation is required.

17d) Result in inadequate emergency access? ☐ ☐ ☒ ☐

The Project is not anticipated to generate a large number of traffic trips as the Project does not include residential development or uses associated with inducing substantial population growth. The Project is a self-storage facility, and the property is designated for Commercial and Industrial uses. Primary vehicular access to the Project site is proposed via Old Scandia Lane. All development and site improvements would be designed to meet LACFD standards. The LACFD Fire Prevention Division has reviewed the Project and specified access requirements concerning minimum roadway width, fire apparatus access roads, fire lanes, signage, access devices and gates, and access walkways, among other requirements, which would enhance emergency access to the Project site. Following compliance with LACFD access requirements, adequate emergency access to the Project site would be provided. Impacts would be less than significant in this regard, and no mitigation is required.

18. TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
18a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code § 5020.1(k), or	☐	☐	☐	☒

See also **Section 5.0: Cultural Resources**.

Topographic maps and aerial photographs reviewed as part of the records search conducted for the Project showed portions of the Project site had been subject to previous disturbances related to mechanical excavation, as well as the existence of a building that had been removed by 1985. The Project site is currently vacant and undeveloped. There are no buildings or known tribal cultural resources present on the Project site. Further, the records search indicated that one study (designated LA-2020) assessed the entire Project site for cultural resources in 1990. No cultural resources were identified within the Project site boundaries during this study. Therefore, the Project would not cause an adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources. No impact would occur.

ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

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

Native American groups may have knowledge about cultural resources in the area and may have concerns about adverse effects from development on tribal cultural resources as defined in PRC §21074. In compliance

with PRC §21080.3.1(b), the County provided formal notification to California Native American tribal representatives identified by the California Native American Heritage Commission. The County received one request for consultation from the Gabrieleño Band of Mission Indians – Kizh Nation. Consultation was scheduled to occur on December 15, 2022, however, on December 15, 2022 the Gabrieleño Band of Mission Indians – Kizh Nation representative cancelled the scheduled meeting and deferred to the Chumash tribe for consultation; see **Appendix G**. The County attempted to contact the Chumash tribal representatives, however, no response or request to schedule tribal consultation was received. Notwithstanding the findings of the records search discussed above and extent of past site disturbance, given the anticipated excavations into native soils, the potential exists for accidental discovery of tribal cultural resources during ground-disturbing activities. Therefore, the Project could cause an adverse change in the significance of an as-yet unidentified tribal cultural resource. Therefore, the County has determined that implementation of MMs TCR-1 and TCR-2 is required. MM TCR-1 requires a tribal monitor to be present on the site during construction phases and MM TCR-2 outline instructions for unanticipated discovery of tribal cultural and archaeological resources discovery of human remains and funerary objects, and procedures for funerary remains. With implementation of MM TCR-1 and MM TCR-2, the Project's potential impacts concerning an adverse change in the significance of an as-yet unidentified tribal cultural would be reduced to less than significant.

Mitigation Program

MM TCR-1 **Retain an Archaeologist/Native American Monitor.** The Project applicant/County shall retain a qualified professional archaeologist and Native American Monitor prior to the commencement of any ground-disturbing activity for the Project at all Project locations (i.e., both on-site and any off-site locations that are included in the Project description/definition and/or required in connection with the Project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, and any cultural materials identified. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the Project applicant/lead agency upon written request. Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the tribal monitor and/or tribal archaeologist. On-site tribal monitoring shall conclude when Project site grading and excavation activities are completed, or when the Native American Monitor indicates the site has a low potential for impacting TCRs.

MM TCR-2 **Unanticipated Discovery of Tribal Cultural and Archaeological Resources.** Upon discovery of any tribal cultural or archaeological resources, cease construction activities in the immediate vicinity of the field until the find can be assessed. All tribal cultural an archaeological resources unearthed by Project construction activities shall be evaluated by the qualified archeologist and tribal monitor/consultant approved by the County. If the resources are Native American in origin, the County shall coordinate with the NAHC

to determine which tribes should be contacted regarding direction on treatment and curation of these resources. Typically, tribes request preservation in place or recovery for educational purposes. Work may continue on other parts of the project while evaluation and, if necessary, additional protective mitigation takes place. If a resource is determined by the qualified archaeologist to constitute a "historical resource" or "unique archaeological resource," time allotment and funding sufficient to allow for implementation of avoidance measures, or appropriate mitigation, must be available. The treatment plan established for the resources shall be in accordance with State CEQA Guidelines §16054.5(f) for historical resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. Any historic archaeological material that is not Native American in origin (non-TCR) shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

19. UTILITIES AND SERVICE SYSTEMS

Would the project:	*Potentially Significant Impact*	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
19a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?	☐	☒	☐	☐

Water. See Response 19.b concerning water demand and infrastructure.

Wastewater. The Project proposes to connect to and replace the existing 8-inch sewer line, which traverses the Project site and serves offsite areas. Through the Project's entitlement review process, the applicant would coordinate with the County to address any potential service interruptions during Project construction. See Response 19.c concerning wastewater treatment.

Stormwater. See Response 10.c concerning drainage and stormwater improvements.

Dry Utilities. Electrical power to the Project site is provided by SCE and natural gas is provided by SoCalGas. Telecommunications are provided by various companies. SCE, SoCalGas, and local telecommunications companies operate and maintain transmission and distribution infrastructure in the Project area, which would serve the Project. Refer to Responses 4.6a and 4.6b for further discussions concerning electricity and natural gas usage. The Project proposes to connect to existing electrical, natural gas, and telecommunications infrastructure, and no off-site improvements are proposed.

Conclusion. The Project would require relocation/construction/replacement of water, wastewater, stormwater drainage, electric power, natural gas, and telecommunication facilities, the construction/relocation of which could cause significant environmental effects. No offsite utility improvements except lateral connections are proposed. The environmental effects associated with these proposed utility improvements are analyzed throughout this Initial Study. As concluded in this Initial Study, following compliance with the established regulatory framework, the utility improvements' environmental effects would result in no impact or less than significant impacts for all resource areas analyzed, except concerning biological resources, cultural resources, hydrology and drainage, and tribal cultural resources, which would require mitigation; see **Section 4: Biological Resources**, **Section 5: Cultural Resources**, **Section 10: Hydrology and Water Quality**, and **Section 18: Tribal Cultural Resources**, respectively. Therefore, with mitigation incorporated, the Project's proposed relocation/construction/replacement of water, wastewater, stormwater drainage, electric power, natural gas, and telecommunication facilities, would result in a less than significant environmental effect.

19b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? ☐ ☐ ☒ ☐

See Response 10b above. The LVMWD provides water (and wastewater) services to the Project site and surrounding communities. The LVMWD relies on four water supply sources: imported potable water; recycled water from the TWRF; groundwater from the Thousand Oaks Area Basin; and surface runoff into the Las Virgenes Reservoir. The 2020 LVMWD Urban Water Management Plan (UWMP) demonstrates how LVMWD will carry out its long-term resource planning responsibilities to ensure adequate water supplies to meet existing and future demands for water. UWMP water demand forecasts are based on adopted general plans. The Project is consistent with the site's existing land use designation; thus, its demands are accounted for in the UWMP's long-term planning. Further, the Project would generate only nominal population growth (three persons, see Response 14a), thus, nominal associated water demand. According to the UWMP, water supplies are expected to exceed water demand for the next 25 years during normal, dry, and multiple dry years. Therefore, sufficient water supplies would be available to serve the proposed Project and reasonably foreseeable future development during normal, dry, and multiple dry years. A less than significant impact would occur, and no mitigation is required.

19c) 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? ☐ ☐ ☒ ☐

The Project site is within the jurisdictional boundaries of the LVMWD Sewer Service Area.[74] The Project's wastewater would be treated at the Tapia Water Reclamation Facility (TWRF). TWRF provides primary, secondary, and tertiary treatment for LVMWD wastewater and any supplemental water including groundwater. TWRF, owned by the Joint Powers Authority (JPA) of LVMWD, treats up to 10 millions of gallons per day (mgd) of wastewater for the recycled water distribution system. The current design treatment capacity of TWRF is 16 mgd (17,922 AFY). In 2020, wastewater flows to the TWRF totaled approximately 7.8 mgd (8,742 AFY) with 4.3 mgd (4,779 AFY) from customers in LVMWD service area. Approximately 0.27mgd (299 AFY) of groundwater was introduced into the wastewater system from LVMWD's two groundwater wells in 2020 to supplement recycled water during the summer months. Wastewater treatment requirements are based on adopted general plans. The Project is consistent with the site's existing land use designation; thus, its wastewater treatment requirements are accounted for in the TWRF treatment capacity. Therefore, the TWRF would have adequate capacity to serve the Project's projected demand. A less than significant impact would occur in this regard, and no mitigation is required.

19d) 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?	☐	☐	☒	☐
19e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

The Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force), developed by the LACPWD, provides solid waste and recycling services for the County's residential, commercial, and industrial customers. Project implementation would increase solid waste disposal demands over existing conditions, as the Project site is vacant and the Project proposes a self-storage facility with office/manager's residence. It is anticipated the Project would be served by the Calabasas Landfill, the disposal facility nearest the Project site, which is approximately 3.5 miles to the west, at 5300 Lost Hills Road, Agoura, CA 91301. Calabasas Landfill's maximum permitted throughput is 3,500 tons per day (TPD). The facility's remaining capacity is approximately 14.5 million CY and maximum capacity is approximately 69.3 million CY, respectively.[75] Thus, the Project would be served by a landfill with sufficient remaining permitted capacity to accommodate the Project's solid waste disposal needs. Operational activities would be subject to compliance with all applicable federal, State, and local statutes and regulations for solid waste, including those identified under CALGreen and AB 939. The Project would result in less than significant impacts concerning solid waste, and no mitigation is required.

[75] California Department of Resources Recycling and Recovery (CALRecycle). (2022). *Solid Waste Information System (SWIS) Calabasas Landfill (19-AA-0056)*. Retrieved from: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/3579?siteID=1041.

20. WILDFIRE

	Potentially Significant Impact	*Less Than Significant Impact 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:				
20a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐

California Department of Forestry and Fire Protection (CalFire) Fire Hazard Severity Zone Map for the County of Los Angeles indicates the Project site is not within a State Responsibility Area.[76] The Project site is in a VHFHSZ local responsibility area. However, Project design and site access would adhere to the County of Los Angeles Municipal Code Chapter 503.4 which establishes that fire apparatus access roads would not be impeded in any manner.[77] Further, Project construction would not require the complete closure of any public or private streets or roadways during construction. Temporary construction activities would not impede use of the road for emergencies or access for emergency response vehicles. Therefore, the Project would not result in inadequate emergency, and there would be less than significant impacts. See also Response 9f.

20b) 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?	☐	☐	☒	☐

The Project is within an area classified as a VHFHSZ. Although the Project site is relatively flat, it abuts a slope to the north that could exacerbate wildfire risks. However, the Project design would include retaining walls and a rock barrier, which would reduce wildfire risk associated with the slope and serve as a buffer to slow the spread of a wildfire. The proposed Project would also be subject to fire prevention measures outlined in the County of Los Angeles Municipal Code Chapter 105.7.26.2. which requires that officials review plans and projects to ensure that fire codes are complied with.[78] Therefore, impacts would be less than significant. See also Response 9.g.i.

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[76] California Department of Forestry and Fire Protection. *California Fire Hazard Severity Zone Viewer*. https://egis.fire.ca.gov/FHSZ/. Accessed 6/22/22.

[77] County of Los Angeles. *Code of Ordinances*. https://library.municode.com/ca/los_angeles_county/codes/code_of_ordinances?nodeId=TIT32FICO_503.4OBFIAPACRO. Accessed 6/27/22.

[78] County of Los Angeles. *Code of Ordinances*. https://library.municode.com/ca/los_angeles_county/codes/code_of_ordinances?nodeId=TIT32FICO_105.7.26.2LADEPLRE. Accessed 6/23/22.

20c) 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? ☐ ☐ ☐ ☒

The Project site is not located in a State responsibility area but is within an area classified as a VHFHSZ. The Project site is in an urbanized area of the County and would connect to the existing infrastructure that currently serves the Project area. The Project would not require the construction or installation of new infrastructure beyond new points of connection to existing infrastructure along Old Scandia Lane. Project implementation would not result in the new construction, installation, or maintenance of new infrastructure, such that the Project would exacerbate fire risk or result in temporary or ongoing environmental impacts. A less than significant impact would occur in this regard, and no mitigation is required.

20d) 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? ☐ ☐ ☒ ☐

The Project site is located within an area classified as a VHFHSZ with an abutting slope to the north. According to the California Geologic Survey, the Project site is located approximately 500 feet from a landslide zone.[79] As part of the Project design, the Project would construct a north facing retaining wall adjacent to the hillside that would reduce the risk of landslides in the event of post-fire instability. A rockfall barrier would also be placed along the hillside to prevent debris and rocks from damaging the proposed structures. Additionally, a concrete V-gutter proposed around the northern and western Project boundaries would capture runoff from the hillside. Therefore, given the proposed Project design features, which would minimize downstream flooding, landslides, and post-fire slope instability risks, the Project would not expose people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes. Impacts would be less than significant, and no mitigation is required.

20e) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? ☐ ☐ ☒ ☐

See Responses 9f, and 20a through 20d above.

[79] California Geological Survey. *Geologic Hazards Data and Maps Data Viewer.* https://maps.conservation.ca.gov/geologichazards/. Accessed 6/21/22.

21. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
21a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐

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

As concluded in **Section 4: Biological Resources**, with mitigation incorporated, the Project would not 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 concluded in **Section 5: Cultural Resources**, the Project would not eliminate important examples of the major periods of California history. As also concluded in **Section 5**, following compliance with MM TCR-1 and TCR-2, potential impacts to archaeological resources would be reduced to less than significant.

As concluded in **Section 18: Tribal Cultural Resources**, the Project could cause an adverse change in the significance of a tribal cultural resource, unless mitigated. Following compliance with MM TCR-1 and TCR-2, potential impacts to tribal cultural resources would be reduced to less than significant.

21b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐

The proposed Project would result in significant impacts unless mitigated for the following environmental resource areas: biological resources, cultural resources, and tribal cultural resources. The impacts associated with these resource areas are localized, thus, would not result in cumulative impacts. A Mitigation Program has been prepared for each of these environmental issue areas to reduce impacts to less than significant. The County would also impose COAs on the Project. Other development projects within the County would also be subject to these requirements, as applicable.

For all other resource areas, it was determined the Project would either have no impact or a less than significant impact following compliance with the established regulatory framework, without the need for mitigation. Cumulatively, the proposed Project would not result in any significant impacts that would substantially combine with impacts of other current or probable future impacts; see also Responses 3d and 8b. Therefore, the proposed Project, when combined with other projects, would not result in any cumulatively considerable impacts, and no mitigation is required.

21c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

As discussed in the respective sections, the proposed Project would have no potentially significant impacts. The Project would not cause substantial adverse effects on human beings directly or indirectly. Therefore, impacts concerning adverse effects on human beings would be less than significant, and no mitigation is required.