INITIAL STUDY & MITIGATED NEGATIVE DECLARATION

GO STORE IT SELF-STORAGE
15932 MINNESOTA AVENUE
CITY OF PARAMOUNT

Zone Change, Development Review, and Merger of Parcels

LEAD AGENCY:

CITY OF PARAMOUNT PLANNING DEPARTMENT
16400 COLORADO BOULEVARD
PARAMOUNT, CALIFORNIA 90723

REPORT PREPARED BY:

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

September 2022

TABLE OF CONTENTS

APPENDICES

Figures **Page**

Tables **Page**

INITIAL STUDY

1 INTRODUCTION

This Initial Study (IS) document evaluates potential environmental effects resulting from the construction and operation of the proposed Go Store It Self-Storage (Project). The Project is subject to the guidelines and regulations of the California Environmental Quality Act (CEQA). Therefore, this document has been prepared in compliance with the relevant provisions of CEQA and the State CEQA Guidelines as implemented by the City of Paramount (City). Based on the analysis provided within this Initial Study, the City has concluded that the Project would not result in significant impacts on the environment. This Initial Study and Mitigated Negative Declaration (IS/MND) is intended as informational documentation and is ultimately required to be adopted by the decision-maker prior to Project approval by the City.

1.1 PURPOSE OF AN INITIAL STUDY

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

An application for the Project has been submitted to the City's Planning Department for discretionary review. The Planning Department, as the Lead Agency, has determined that the Project is subject to CEQA, and the preparation of an IS/MND is required.

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

This IS/MND has been prepared in accordance with CEQA (Public Resources Code §21000 et seq.) and the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.).

1 *Project Alternatives are only required in an EIR.*

1.2. ORGANIZATION OF THE IS/MND

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

1 INTRODUCTION

Describes the purpose and content of the Initial Study and provides an overview of the CEQA process.

2 EXECUTIVE SUMMARY

Provides Project information, identifies environmental issues addressed in the Initial Study, and includes a determination of whether the project may have a significant effect on the environment.

3 PROJECT DESCRIPTION

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

4 EVALUATION OF ENVIRONMENTAL IMPACTS

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

5 PREPARES AND PERSONS CONSULTED

Identifies the Lead Agency, Project Applicant, and others involved in the preparation of the Initial Study.

INITIAL STUDY

2 EXECUTIVE SUMMARY

PROJECT TITLE	GO STORE IT SELF-STORAGE
ENTITLEMENTS	DEVELOPMENT REVIEW ZONE CHANGE MERGER OF PARCELS

PROJECT LOCATION	15932-15942 MINNESOTA AVENUE PARAMOUNT, CA 90723

LEAD AGENCY	CITY OF PARAMOUNT
STAFF CONTACT	JOHN KING
ADDRESS	16400 COLORADO BOULEVARD PARAMOUNT, CA 90723
PHONE NUMBER	562-220-2036
EMAIL	JKING@PARAMOUNTCITY.COM

APPLICANT	MADISON CAPITAL GROUP MANAGEMENT, LLC
ADDRESS	450 NEWPORT CENTER DRIVE, SUITE 250 NEWPORT BEACH, CA 92660
PHONE NUMBER	310-367-9905

PROJECT DESCRIPTION SUMMARY

The proposed development includes the demolition and removal of the existing 12,850 square feet of industrial/manufacturing buildings from the property located at 15932-15942 Minnesota Avenue (Project Site) and the development of the Project Site with a 104,630-square-foot self-storage building, inclusive of a 750-square-foot ancillary leasing office (Project). The building would be five stories tall, reaching a maximum height of 55 feet. The building would be staffed with a peak of approximately three employees from 8:00 AM to 6:30 PM with customer access available from 5:00 A.M. to 10:00 P.M., seven days a week.

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

ENVIRONMENTAL SETTING

The 0.74-acre (32,022-square-foot) Project Site is located at 15932-15942 Minnesota Avenue in the City and comprises assessor parcel numbers (APNs) 7012-013-017, -018, -019, and -020. The Project Site is located in the southcentral portion of the City and is bounded by Minnesota Avenue on the west and warehouse uses on the north, east, and south. Regional access to the site is provided via Interstate 710 located approximately 1.25 miles to the west, Interstate 105 located approximately 1.5 miles to the north, and State Route 91 located approximately 1.0 miles to the south. The Project Site is currently developed with 12,850 square feet of industrial/manufacturing uses. The area surrounding the Project Site is largely developed with other existing industrial/manufacturing/warehouse uses. The Project Site is zoned M-2 (Heavy Manufacturing) and has a land use designation of Area Plan: Central Industrial District.

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

OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED

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

None.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

---

DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

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

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

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

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

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

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

EVALUATION OF ENVIRONMENTAL IMPACTS

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

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

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

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

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

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

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

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

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

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

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

9) The explanation of each issue should identify:

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

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

INITIAL STUDY

3 PROJECT DESCRIPTION

3.1 ENVIRONMENTAL SETTING

The 0.74-acre (32,022-square-foot) Project Site is located at 15932-15942 Minnesota Avenue in the City and comprises assessor parcel numbers (APNs) 7012-013-017, -018, -019, and -020. The Project Site is located in the southcentral portion of the City and is bounded by Minnesota Avenue on the west and warehouse uses on the north, east, and south. The Project Site location is shown in Figures 3-1 and 3-2. Regional access to the site is provided via Interstate 710 located approximately 1.25 miles to the west, Interstate 105 located approximately 1.5 miles to the north, and State Route 91 located approximately 1.0 miles to the south. The Project Site is currently developed with 12,850 square feet of industrial/manufacturing uses. The area surrounding the Project Site is largely developed with other existing industrial/manufacturing/warehouse uses. The Project Site is zoned M-2 (Heavy Manufacturing) and has a land use designation of Area Plan: Central Industrial District.

3.2 DESCRIPTION OF PROJECT

3.3.1 Project Overview

The Project includes the demolition and removal of the existing 12,850 square feet of industrial/manufacturing buildings from the Project Site and the development of the site with a 104,630-square-foot self-storage building, inclusive of a 750-square-foot ancillary leasing office. The building would be five stories tall, reaching a maximum height of 55 feet. The building would be staffed with a peak of approximately three employees from 8:00 AM to 6:30 PM with customer access available from 5:00 AM to 10:00 PM, seven days a week. Project plans are shown in Figures 3-3 through 3-9.

3.3.2 Access and Circulation

Vehicular access to the Project Site would be provided by two new 28-foot-wide driveways on Minnesota Avenue. The new driveways would be shifted north and south from the location of the existing driveway and located at the northwest and southwest corners of the Project Site. The southerly Project driveway would be restricted to left-/right-turns inbound only (i.e., ingress-only movement), and the northerly Project driveway would be restricted to left-/right-turns outbound (i.e., egress-only movement). Within the Project Site, vehicle circulation would be accommodated by the drive aisle situated in a north-south alignment to provide adequate space for the circulation of inbound and outbound vehicles during loading and unloading operations.

Legend

Project Site

Source: Google Maps 2022.

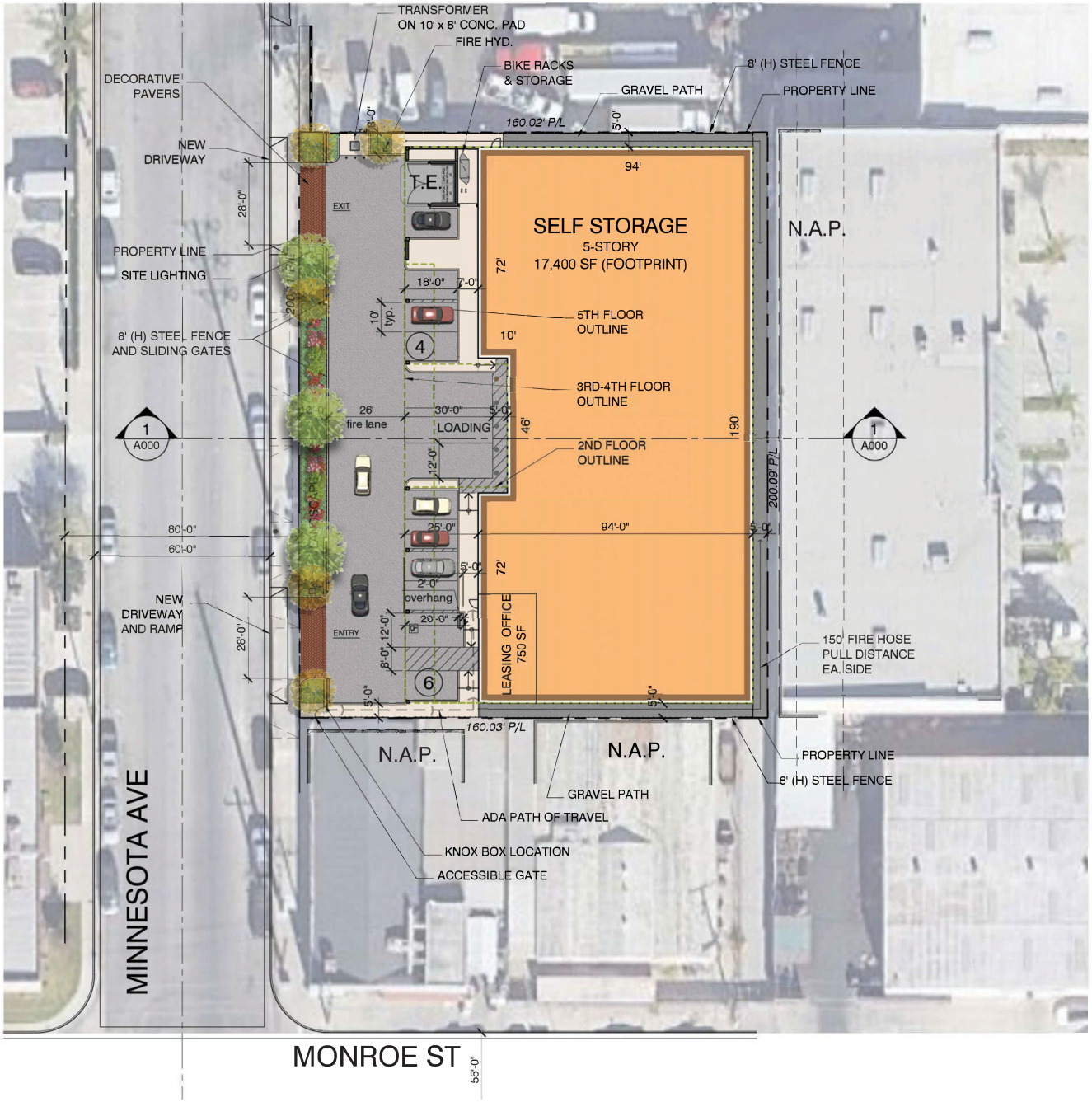
Figure 3-1
Regional Location Map

Legend

Project Site

Source: Google Maps 2022.

Figure 3-2
Aerial of the Project Site



Source: MCG Architecture, 2022.

Figure 3-3
Project Site Plan

Figure 3-4
First Floor Plan

Source: MCG Architecture, 2022.

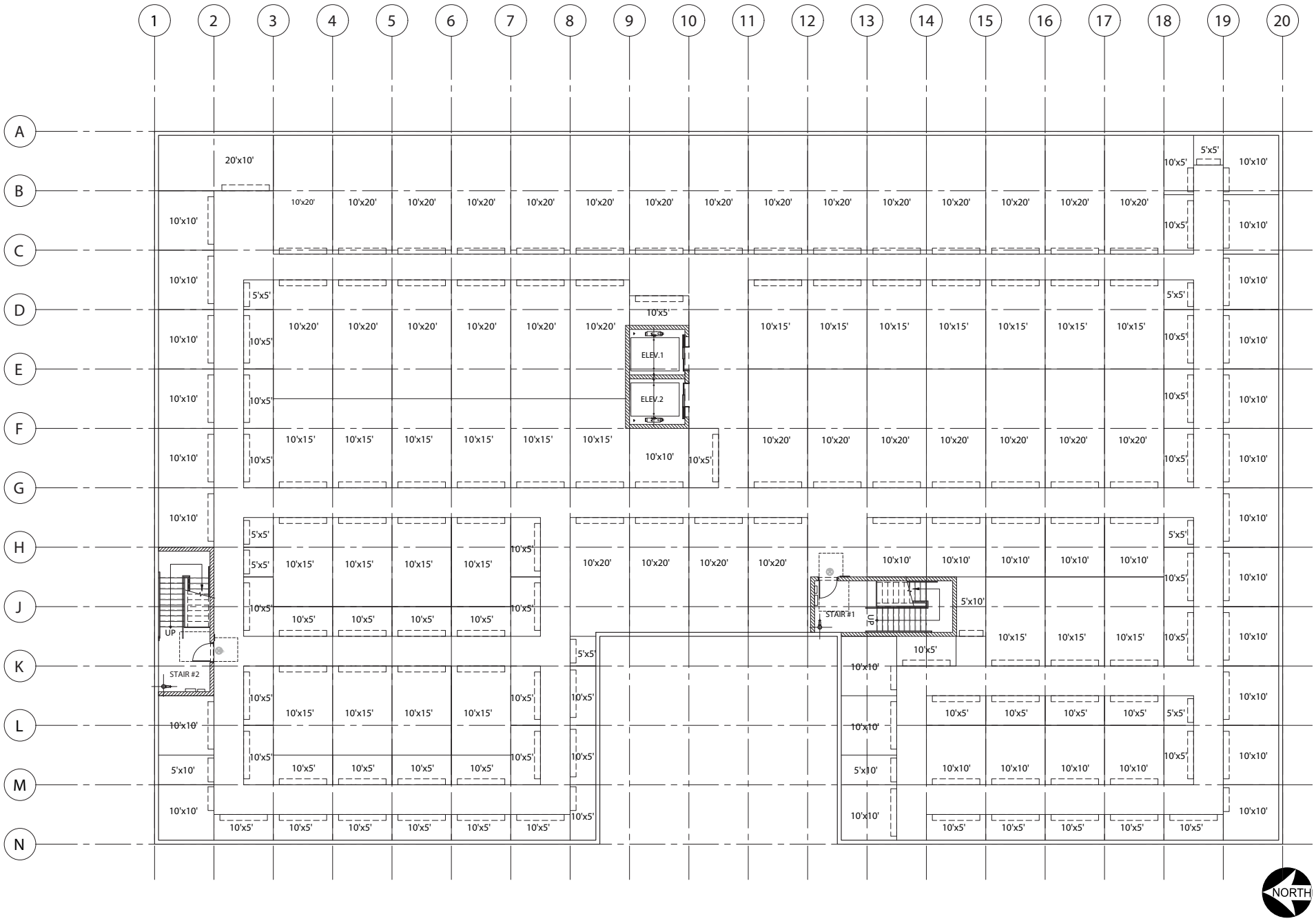


Figure 3-5
Second Floor Plan

Source: MCG Architecture, 2022.

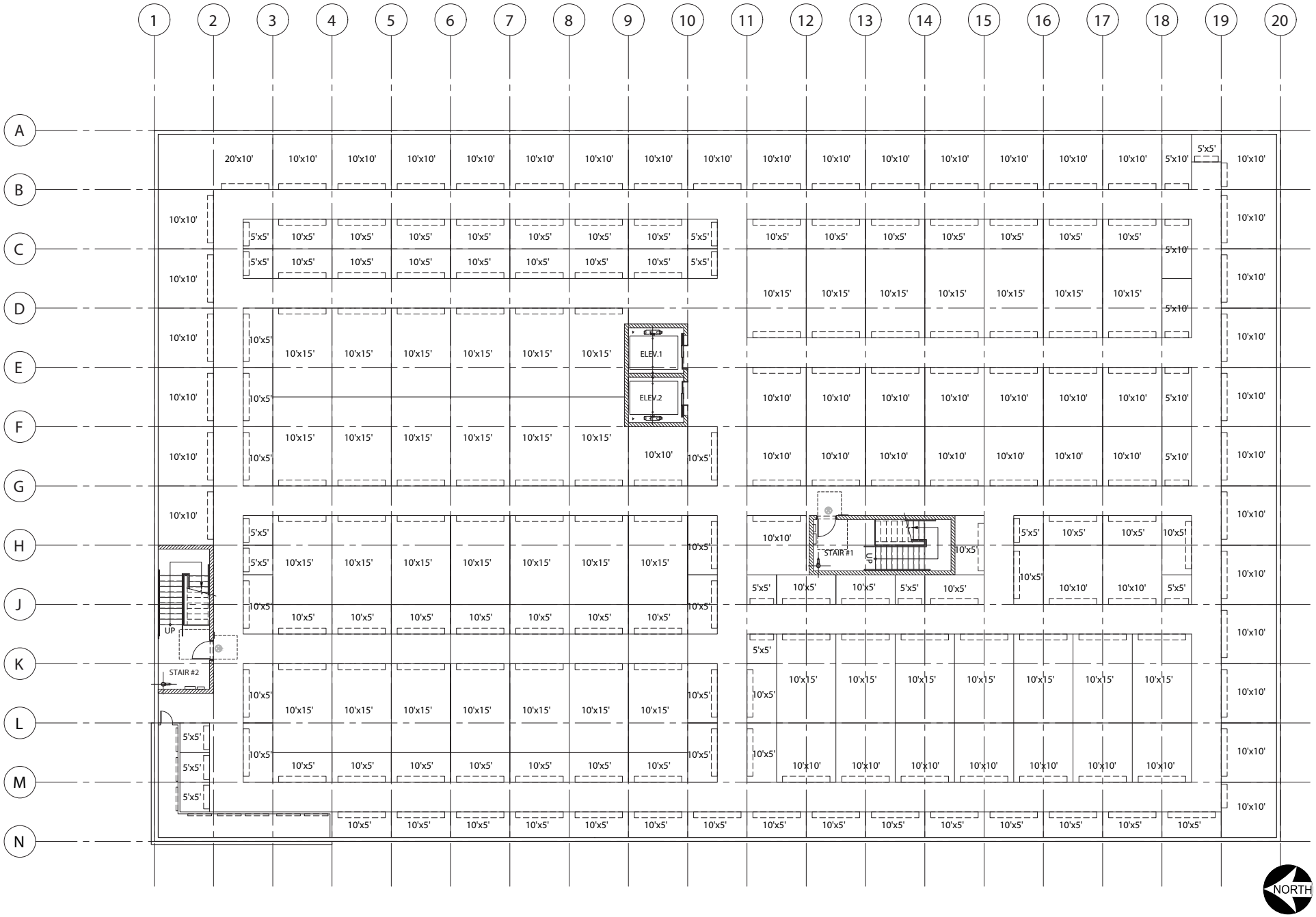


Figure 3-6
Third Floor Plan

Source: MCG Architecture, 2022.

Source: MCG Architecture, 2022.

Figure 3-7
Fourth Floor Plan

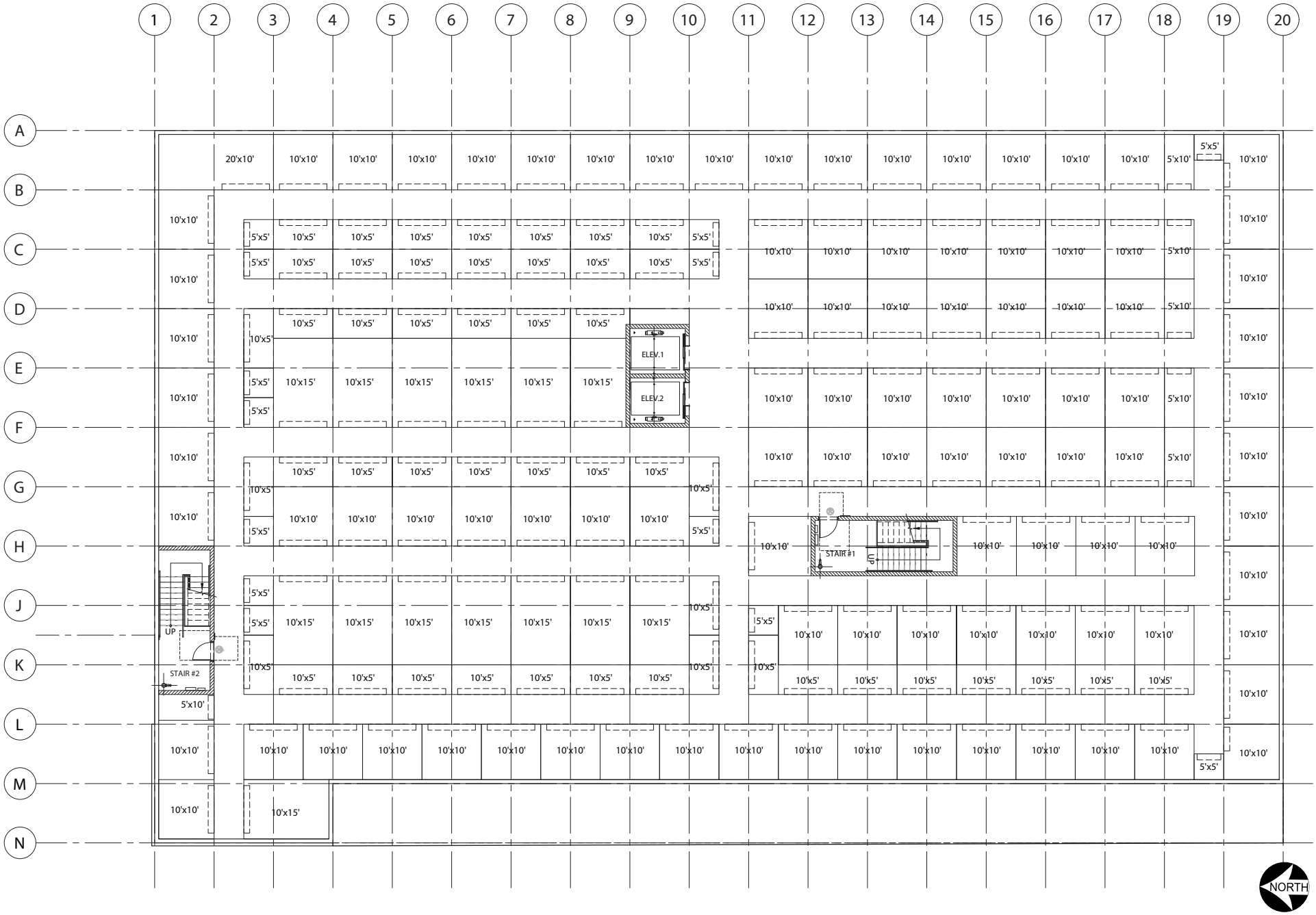


Figure 3-8
Fifth Floor Plan

Source: MCG Architecture, 2022.

NORTH ELEVATION

WEST ELEVATION

SOUTH ELEVATION

EAST ELEVATION

KEY PLAN

N

Source: MCG Architecture, 2022.

Figure 3-9
Elevations

3.3.3 Parking

The City of Paramount Municipal Code (CPMC) does not currently specify off-street parking and loading requirements for self-storage facilities located within the Planned Development with Performance Standards (PD-PS) zone. The Code (Section 17.44.460, Number of Off-Street Parking Spaces Required) specifies the following guidance when parking requirements are not specified for a certain use:

> *The parking requirements for a use not specifically named in this section shall be determined by the Planning Commission in the manner set forth in Section 17.44.040 and such determination shall be based upon the requirements for the most comparable use specified herein. (Ord. 1152 § 4, 2021; prior code § 44-130).*

Based on a parking study prepared for the Project (refer to Appendix I), the Project would include a total of 13 parking spaces, including 3 loading spaces on-site. The parking spaces would be provided within a surface parking area located near the western portion of the Project Site. The 3 loading spaces would be approximately 30 feet long. Additionally, the Project would include a minimum of 1 handicap accessible space in the parking area to comply with the Americans with Disabilities Act (ADA) requirement of a minimum of 1 space of the total on-site parking supply as accessible space (i.e., for parking facilities with 1 to 25 spaces with 1 in every 6 handicap spaces being van accessible).

Additionally, the Project would include 2 bicycle racks located just south of the leasing office.

3.3.4 Estimated Construction Schedule

The Project's construction phase would occur over an estimated 15-month period. The estimated construction schedule is shown in Table 3-1.

Table 3-1
Estimated Construction Schedule

Phase	Duration	Notes
Demolition	Month 1	Removal of 17,790 cubic yards of building floor area hauled 25 miles to landfill in 16-cubic-yard capacity trucks.
Grading	Month 2 (2 weeks)	Approximately 1,500 cubic yards of soil imported 25 miles in 16-cubic-yard capacity trucks.
Trenching	Months 2-3 (6 weeks)	Trenching for utilities, including gas, water, electricity, and telecommunications.
Building Construction	Months 3-15	Footings and foundation work (e.g., pouring concrete pads), framing, welding; installing mechanical, electrical, and plumbing. Floor assembly, interior painting, cabinetry and carpentry, elevator installations, low voltage systems, trash management.
Paving	Month 14 (two weeks)	Flatwork, including paving of driveways and walkways.
Architectural Coatings	Months 13-15	Application of interior and exterior coatings and sealants.

3.3 REQUESTED PERMITS AND APPROVALS

The Project Applicant is requesting approval by the City of the following entitlements:

- Zone Change from M-2 to Planned Development with Performance Standards
- Development Review
- Merger of Parcels

Other approvals and permits from the Building and Safety Division and other municipal agencies could be required for Project construction actions including, but not limited to construction permits as required by City Building and Safety Division of the Planning Department, City Engineering Division of the Public Works Department, and/or City Public Works Department.

INITIAL STUDY

4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

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

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

No Impact. The Project Site is located in a highly urbanized area of the City. Views from within the Project Site area are largely limited to typical urban development (e.g., buildings/structures, signage, lighting, roadway infrastructure, etc.). No scenic views are available from within the Project Site area. Additionally, the Project Site is not in or near a designated scenic vista. Thus, the Project would not have a substantial adverse effect on a scenic vista. Therefore, no impacts related to scenic vistas would occur as a result of the Project.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a state scenic highway?

Less Than Significant Impact. No trees, rock outcroppings, or significant historic buildings are located on the Project Site, and the site is not visible from a state scenic highway. Thus, the Project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a state scenic highway. Therefore, no impacts related to scenic resources would occur as a result of the Project.

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

No Impact. The Project Site is located in a highly urbanized area of the City. The Project Site is currently developed with 12,850 square feet of industrial/manufacturing uses, which includes various corrugated metal buildings that are outdated in appearance. The Project includes demolition and removal of the existing uses from the Project Site and development of the site with a new 104,630-square-foot self-storage building, a use allowed under the existing zoning for the site. The Project building would reflect current architecture and design standards and would likely improve the visual character of the Project Site. Additionally, the Project would be required to undergo Design Review by the City to ensure that the Project complies with applicable design standards. The Project would not conflict with applicable zoning and other regulations governing scenic quality. Therefore, no impacts related to scenic quality would occur as a result of the Project.

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

Less Than Significant Impact. The Project Site is located in an urbanized area of the City and is currently developed with 12,850 square feet of industrial/manufacturing uses. The Project Site and surrounding area contain typical sources of light and glare, including interior/exterior building lighting, street lighting, metal, and glass. There are no light-sensitive land uses located adjacent to the Project Site. The Project includes demolition and removal of the existing uses from the Project Site and development of the site with a new 104,630-square-foot self-storage building. The Project building and parking lot would be equipped with light fixtures that would be shielded and directed downward and would not spill onto adjacent properties. Thus, the Project would not create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area. Therefore, Project impacts related to light and glare would be less than significant.

Cumulative Impacts

There are six related projects in the City (refer to Appendix A). Due to distance and intervening development, none of the related projects are within visual proximity to the Project Site. (Related Project No. 2 is the related project closest to the Project Site, located at 7803 Alondra Boulevard, approximately 0.3 miles from the Project Site.) Thus, the cumulative development would not result in any cumulative aesthetics impacts.

Mitigation Measures

No significant impacts related to aesthetics have been identified, and no mitigation measures are required.

II. AGRICULTURE AND FORESTRY RESOURCES

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

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

No Impact. The Extent of Important Farmland Map Coverage maintained by the Division of Land Protection indicates that the Project Site is not included in the Important Farmland category.[1] Therefore, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to non-agricultural use, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. No mitigation measures are required.

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

No Impact. The Project Site is not zoned for agricultural use, and the site is not under Williamson Act Contract.[2] Therefore, the Project would not conflict with existing zoning for agricultural use, or a Williamson Act Contract. No mitigation measures are required.

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

No Impact. The Project Site is not zoned as forest land or timberland. Therefore, no impacts related to this issue would occur. No mitigation measures are required.

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

No Impact. The Project Site does not contain any forest land. Therefore, no impacts related to this issue would occur. No mitigation measures are required.

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

No Impact. The Project Site and surrounding area are developed with urban land uses. No agricultural uses are located on the Project Site or within the area. Therefore, no impacts related to this issue would occur. No mitigation measures are required.

---

1 *State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland, 1998.*

2 *Ibid.*

Cumulative Impacts

Neither the Project Site nor any of the related projects' sites are used or designated as agricultural land or forest land. Therefore, no cumulative impacts related to agricultural resources would occur.

Mitigation Measures

No significant impacts related to agricultural resources have been identified, and no mitigation measures are required.

III. AIR QUALITY

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

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

The analysis provided below is primarily based on technical data prepared by DKA Planning (refer to Appendix B).

REGULATORY FRAMEWORK

Federal

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

The 1990 amendments to the CAA identify specific emission reduction goals for areas not meeting the National Ambient Air Quality Standard (NAAQS). These amendments

require both a demonstration of reasonable further progress toward attainment and incorporation of additional sanctions for failure to attain or to meet interim milestones. The sections of the CAA which are most applicable to the Project include Title I (Nonattainment Provisions) and Title II (Mobile Source Provisions).

NAAQS have been established for seven major air pollutants: carbon monoxide (CO) nitrogen dioxide (NO_2), ozone (O_3), particulate matter, 2.5 microns ($PM_{2.5}$), particulate matter, 10 microns (PM_{10}), sulfur dioxide (SO_2), and lead (Pb).

The Clean Air Act (CAA) requires the USEPA to designate areas as attainment, nonattainment, or maintenance (previously nonattainment and currently attainment) for each criteria pollutant based on whether the National Ambient Air Quality Standards (NAAQS) have been achieved. Title I provisions are implemented for the purpose of attaining NAAQS. The federal standards are summarized in Table III-1. The USEPA has classified the Los Angeles County portion of the South Coast Air Basin (Basin) as a nonattainment area for O_3, $PM_{2.5}$, and Pb.

CAA Title II pertains to mobile sources, such as cars, trucks, buses, and planes. Reformulated gasoline and automobile pollution control devices are examples of the mechanisms the USEPA uses to regulate mobile air emission sources. The provisions of Title II have resulted in tailpipe emission standards for vehicles, which have been strengthened in recent years to improve air quality. For example, the standards for NO_X emissions have been lowered substantially and the specification requirements for cleaner-burning gasoline are more stringent.

The USEPA regulates emission sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain types of locomotives. USEPA has jurisdiction over emission sources outside state waters (e.g., beyond the outer continental shelf) and establishes various emission standards, including those for vehicles sold in states other than California. Automobiles sold in California must meet stricter emission standards established by CARB. USEPA adopted multiple tiers of emission standards to reduce emissions from non-road diesel engines (e.g., diesel-powered construction equipment) by integrating engine and fuel controls as a system to gain the greatest emission reductions. The first federal standards (Tier 1) for new non-road (or off-road) diesel engines were adopted in 1994 for engines over 50 horsepower, to be phased in from 1996 to 2000. On August 27, 1998, USEPA introduced Tier 1 standards for equipment under 37 kW (50 horsepower) and increasingly more stringent Tier 2 and Tier 3 standards for all equipment with phase-in schedules from 2000 to 2008. The Tier 1 through 3 standards were met through advanced engine design, with no or only limited use of exhaust gas after-treatment (oxidation catalysts). Tier 3 standards for NO_x and hydrocarbon are similar in stringency to the 2004 standards for highway engines. However, Tier 3 standards for particulate matter were never adopted. On May 11, 2004, USEPA signed the final rule introducing Tier 4 emission standards, which were phased in between 2008 and 2015. The Tier 4 standards require that emissions of particulate matter and NO_x be further reduced by about 90 percent. Such emission reductions are

achieved through the use of control technologies—including advanced exhaust gas after-treatment.

Table III-1
State and National Ambient Air Quality Standards and Attainment Status for LA County

Pollutant	Averaging Period	California		Federal	
		Standards	Attainment Status	Standards	Attainment Status
Ozone (O_3)	1-hour	0.09 ppm (180 µg/m^3)	Non-attainment	--	--
	8-hour	0.070 ppm (137 µg/m^3)	N/A[1]	0.070 ppm (137 µg/m^3)	Non-attainment
Respirable Particulate Matter (PM_{10})	24-hour	50 µg/m^3	Non-attainment	150 µg/m^3	Maintenance
	Annual Arithmetic Mean	20 µg/m^3	Non-attainment	--	--
Fine Particulate Matter ($PM_{2.5}$)	24-hour	--	--	35 µg/m^3	Non-attainment
	Annual Arithmetic Mean	12 µg/m^3	Non-attainment	12 µg/m^3	Non-attainment
Carbon Monoxide (CO)	1-hour	20 ppm (23 mg/m^3)	Attainment	35 ppm (40 mg/m^3)	Maintenance
	8-hour	9.0 ppm (10 mg/m^3)	Attainment	9 ppm (10 mg/m^3)	Maintenance
Nitrogen Dioxide (NO_2)	1-hour	0.18 ppm (338 µg/m^3)	Attainment	100 ppb (188 µg/m^3)	Maintenance
	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)	Attainment	53 ppb (100 µg/m^3)	Maintenance
Sulfur Dioxide (SO_2)	1-hour	0.25 ppm (655 µg/m^3)	Attainment	75 ppb (196 µg/m^3)	Attainment
	24-hour	0.04 ppm (105 µg/m^3)	Attainment	--	--
Lead (Pb)	30-day average	1.5 µg/m^3	Attainment	--	--
	Calendar Quarter	--	--	0.15 µg/m^3	Non-attainment
Visibility Reducing Particles	8-hour	Extinction of 0.07 per kilometer	N/A	No Federal Standards	
Sulfates	24-hour	25 µg/m^3	Attainment	No Federal Standards	
Hydrogen Sulfide (H_2S)	1-hour	0.03 ppm (42 µg/m^3)	Unclassified	No Federal Standards	
Vinyl Chloride	24-hour	0.01 ppm (26 µg/m^3)	N/A	No Federal Standards	

[1]N/A = not available
Source: CARB, Ambient Air Quality Standards, and attainment status, 2020 (www.arb.ca.gov/desig/adm/adm.htm).

State

California Clean Air Act. In addition to being subject to the requirements of CAA, air quality in California is also governed by more stringent regulations under the California Clean Air

Act (CCAA). In California, CCAA is administered by CARB at the state level and by the air quality management districts and air pollution control districts at the regional and local levels. CARB, which became part of the California Environmental Protection Agency in 1991, is responsible for meeting the state requirements of the CAA, administering the CCAA, and establishing the California Ambient Air Quality Standards (CAAQS). The CCAA, as amended in 1992, requires all air districts in the State to endeavor to achieve and maintain the CAAQS. CAAQS are generally more stringent than the corresponding federal standards and incorporate additional standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles.

CARB regulates mobile air pollution sources, such as motor vehicles. CARB is responsible for setting emission standards for vehicles sold in California and for other emission sources, such as consumer products and certain off-road equipment. CARB established passenger vehicle fuel specifications in March 1996. CARB oversees the functions of local air pollution control districts and air quality management districts, which, in turn, administer air quality activities at the regional and county levels. The State standards are summarized in Table III-1.

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

Toxic Air Contaminant Identification and Control Act. The public's exposure to toxic air contaminants (TACs) is a significant public health issue in California. CARB's statewide comprehensive air toxics program was established in the early 1980s. The Toxic Air Contaminant Identification and Control Act created California's program to reduce exposure to air toxics. Under the Toxic Air Contaminant Identification and Control Act, CARB is required to use certain criteria in the prioritization for the identification and control of air toxics. In selecting substances for review, CARB must consider criteria relating to "the risk of harm to public health, amount or potential amount of emissions, manner of, and exposure to, usage of the substance in California, persistence in the atmosphere, and ambient concentrations in the community" [Health and Safety Code Section 39666(f)].

The Toxic Air Contaminant Identification and Control Act also requires CARB to use available information gathered from the Air Toxics "Hot Spots" Information and Assessment Act program to include in the prioritization of compounds. CARB identified particulate emissions from diesel-fueled engines (diesel PM) TACs in August 1998. Following the identification process, CARB was required by law to determine if there is a

need for further control, which led to the risk management phase of the program. For the risk management phase, CARB formed the Diesel Advisory Committee to assist in the development of a risk management guidance document and a risk reduction plan. With the assistance of the Diesel Advisory Committee and its subcommittees, CARB developed the Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles and the Risk Management Guidance for the Permitting of New Stationary Diesel-Fueled Engines. The Board approved these documents on September 28, 2000, paving the way for the next step in the regulatory process: the control measure phase. During the control measure phase, specific Statewide regulations designed to further reduce diesel PM emissions from diesel-fueled engines and vehicles have and continue to be evaluated and developed. The goal of each regulation is to make diesel engines as clean as possible by establishing state-of-the-art technology requirements or emission standards to reduce diesel PM emissions. Breathing hydrogen sulfide (H_2S) at levels above the state standard could result in exposure to a disagreeable rotten egg odor. The State does not regulate other odors.

California Air Toxics Program. The California Air Toxics Program was established in 1983 when the California Legislature adopted Assembly Bill (AB) 1807 to establish a two-step process of risk identification and risk management to address potential health effects from exposure to toxic substances in the air.[3] In the risk identification step, CARB and the Office of Environmental Health Hazard Assessment (OEHHA) determine if a substance should be formally identified, or "listed," as a TAC in California. Since inception of the program, a number of such substances have been listed, including benzene, chloroform, formaldehyde, and particulate emissions from diesel-fueled engines, among others.[4] In 1993, the California Legislature amended the program to identify the 189 federal hazardous air pollutants as TACs.

In the risk management step, CARB reviews emission sources of an identified TAC to determine whether regulatory action is needed to reduce risk. Based on results of that review, CARB has promulgated a number of airborne toxic control measures (ATCMs), both for mobile and stationary sources. In 2004, CARB adopted an ATCM to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel PM and other TACs. The measure applies to diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds that are licensed to operate on highways, regardless of where they are registered. This measure does not allow diesel-fueled commercial vehicles to idle for more than five minutes at any given time.

In addition to limiting exhaust from idling trucks, CARB adopted regulations on July 26, 2007, for off-road diesel construction equipment such as bulldozers, loaders, backhoes, and forklifts, as well as many other self-propelled off-road diesel vehicles to reduce emissions by installation of diesel particulate filters and encouraging the replacement of

---

3 *California Air Resources Board, California Air Toxics Program, www.arb.ca.gov/toxics/toxics.htm, last reviewed by CARB September 24, 2015.*

4 *California Air Resources Board, Toxic Air Contaminant Identification List, www.arb.ca.gov/toxics/id/taclist.htm, last reviewed by CARB July 18, 2011.*

older, dirtier engines with newer emission-controlled models. In April 2021, CARB proposed a 2020 Mobile Source Strategy that seeks to move California to 100 percent zero-emission off-road equipment by 2035.

Assembly Bill 2588 Air Toxics "Hot Spots" Program. The AB 1807 program is supplemented by the AB 2588 Air Toxics "Hot Spots" program, which was established by the California Legislature in 1987. Under this program, facilities are required to report their air toxics emissions, assess health risks, and notify nearby residents and workers of significant risks if present. In 1992, the AB 2588 program was amended by Senate Bill (SB) 1731 to require facilities that pose a significant health risk to the community to reduce their risk through implementation of a risk management plan.

Air Quality and Land Use Handbook: A Community Health Perspective. The *Air Quality and Land Use Handbook: A Community Health Perspective* provides important air quality information about certain types of facilities (e.g., freeways, refineries, rail yards, ports) that should be considered when siting sensitive land uses such as residences.[5] CARB provides recommended site distances from certain types of facilities when considering siting new sensitive land uses. The recommendations are advisory and should not be interpreted as defined "buffer zones." If a project is within the siting distance, CARB recommends further analysis. Where possible, CARB recommends a minimum separation between new sensitive land uses and existing sources.

Air Quality and Land Use Handbook. CARB published the *Air Quality and Land Use Handbook* (CARB Handbook) on April 28, 2005, to serve as a general guide for considering health effects associated with siting sensitive receptors proximate to sources of TAC emissions. The recommendations provided therein are voluntary and do not constitute a requirement or mandate for either land use agencies or local air districts. The goal of the guidance document is to protect sensitive receptors, such as children, the elderly, acutely ill, and chronically ill persons, from exposure to TAC emissions. Some examples of CARB's siting recommendations include the following: (1) avoid siting sensitive receptors within 500 feet of a freeway, urban road with 100,000 vehicles per day, or rural roads with 50,000 vehicles per day; (2) avoid siting sensitive receptors within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units per day, or where transport refrigeration unit operations exceed 300 hours per week); and (3) avoid siting sensitive receptors within 300 feet of any dry cleaning operation using perchloroethylene and within 500 feet of operations with two or more machines.

California Code of Regulations. The California Code of Regulations (CCR) is the official compilation and publication of regulations adopted, amended, or repealed by the state agencies pursuant to the Administrative Procedure Act. The CCR includes regulations that pertain to air quality emissions. Specifically, Section 2485 in CCR Title 13 states that

[5] *California Air Resources Board, Air Quality and Land Use Handbook, a Community Health Perspective, April 2005.*

the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) used during construction shall be limited to five minutes at any location. In addition, Section 93115 in CCR Title 17 states that operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards.

Regional

South Coast Air Quality Management District

The SCAQMD was created in 1977 to coordinate air quality planning efforts throughout Southern California. SCAQMD is the agency principally responsible for comprehensive air pollution control in the region. Specifically, SCAQMD is responsible for monitoring air quality, as well as planning, implementing, and enforcing programs designed to attain and maintain the CAAQS and NAAQS in the district. SCAQMD has jurisdiction over an area of 10,743 square miles consisting of Orange County; the non-desert portions of Los Angeles, Riverside, and San Bernardino counties; and the Riverside County portion of the Salton Sea Air Basin and Mojave Desert Air Basin. The Basin portion of SCAQMD's jurisdiction covers an area of 6,745 square miles. The Basin includes all of Orange County and the non-desert portions of Los Angeles (including the Project Site area), Riverside, and San Bernardino counties. The Basin is bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east; and the San Diego County line to the south.

Programs that were developed by SCAQMD to attain and maintain the CAAQS and NAAQS include air quality rules and regulations that regulate stationary sources, area sources, point sources, and certain mobile source emissions. SCAQMD is also responsible for establishing stationary source permitting requirements and for ensuring that new, modified, or relocated stationary sources do not create net emission increases. All projects in the SCAQMD jurisdiction are subject to SCAQMD rules and regulations, including, but not limited to the following:

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

- Rule 402 Nuisance – This rule prohibits the discharge of "such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of people or the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property." The SCAQMD uses Rule 402 to address odor complaints.

- Rule 403 Fugitive Dust – This rule requires that future projects reduce the amount of particulate matter entrained in the ambient air as a result of fugitive dust sources by requiring actions to prevent, reduce, or mitigate fugitive dust emissions from any active operation, open storage pile, or disturbed surface area.

Air Quality Management Plan. The 2016 Air Quality Management Plan (AQMP) was adopted in April 2017 and represents the most updated regional blueprint for achieving federal air quality standards. The 2016 AQMP adapts previously conducted regional air quality analyses to account for the recent unexpected drought conditions and presents a revised approach to demonstrated attainment of the 2006 24-hour $PM_{2.5}$ NAAQS for the Basin. Additionally, the 2016 AQMP relied upon a comprehensive analysis of emissions, meteorology, atmospheric chemistry, regional growth projections, and the impact of existing control measures to evaluate strategies for reducing NO_x emissions sufficiently to meet the upcoming O_3 deadline standards.

The SCAQMD is updating the region's air quality attainment plan to address the "extreme" O_3 non-attainment status for the Basin and the severe O_3 non-attainment for the Coachella valley. In November 2021, draft control measures were released for public review that focus on strengthening many stationary source controls and addressing new sources like wildfires. The 2022 AQMP will rely on the growth assumptions in the Southern California Association of Government's (SCAG) 2020-2045 RTP/SCS.

Multiple Air Toxics Exposure Study V. To date, the most comprehensive study on air toxics in the Basin is the Multiple Air Toxics Exposure Study V (released in August 2021).[6] The report included refinements in aircraft and recreational boating emissions and diesel conversion factors. The report finds a Basin average cancer risk of 455 in a million (population-weighted, multi-pathway), which represents a decrease of 54 percent compared to the number in MATES IV (2012) (page ES-13). The monitoring program measured more than 30 air pollutants, including both gases and particulates. The monitoring study was accompanied by a computer modeling study in which the SCAQMD estimated the risk of cancer from breathing toxic air pollution throughout the region based on emissions and weather data. About 88 percent of the risk is attributed to emissions associated with mobile sources, with the remainder attributed to toxics emitted from stationary sources, which include large industrial operations, such as refineries and metal processing facilities, as well as smaller businesses such as gas stations and chrome plating facilities (page ES-12). The results indicate that diesel PM is the largest contributor to air toxics risk, accounting on average for about 50 percent of the total risk (Figure ES-2).

6 *South Coast Air Quality Management District, MATES-V Study. https://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v.*

Southern California Association of Governments

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment. SCAG coordinates with various air quality and transportation stakeholders in Southern California to ensure compliance with the federal and state air quality requirements, including the Transportation Conformity Rule and other applicable federal, state, and air district laws and regulations. As the federally designated Metropolitan Planning Organization (MPO) for the six-county Southern California region, SCAG is required by law to ensure that transportation activities "conform" to, and are supportive of, the goals of regional and state air quality plans to attain the NAAQS. In addition, SCAG is a co-producer, with the SCAQMD, of the transportation strategy and transportation control measure sections of the AQMP for the Basin.

SCAG adopted the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS) on April 7, 2016.[7,8] The 2016–2040 RTP/SCS is the transportation and land use component of the region's air quality plan. It recognized that transportation investments and future land use patterns are inextricably linked, and continued recognition of this close relationship will help the region make choices that sustain existing resources and expand efficiency, mobility, and accessibility for people across the region. In particular, it drew a closer connection between where people live and work, and it offers a blueprint for how Southern California can grow more sustainably. While it has since been updated as described in the next paragraph, it remains the transportation plan that is in the applicable air quality plan for the region (i.e., the 2016 Air Quality Management Plan).

SCAG adopted the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS) on September 23, 2020.[9] The 2020-2045 RTP/SCS aims to address the transportation and air quality impacts of 3.7 million additional residents, 1.6 additional households, and 1.6 million additional jobs from 2016 to 2045. The 2020-2045 RTP/SCS calls for $639 billion in transportation investments and reducing VMT by 19 percent per capita from 2005 to 2035. The 2020-2045 RTP/SCS accommodates 21.3 percent growth in population from 2016 (3,933,800) to 2045 (4,771,300) and a 15.6 percent growth in jobs from 2016 (1,848,300) to 2045 (2,135,900). The regional plan projects several benefits, including the following:

- Decreasing drive-along work commutes by 3 percent

---

7 *Southern California Association of Governments, Final 2016–2040 RTP/SCS.*

8 *California Air Resources Board, Executive Order G-16-066, SCAG 2016 SCS ARB Acceptance of GHG Quantification Determination, June 2016.*

9 *Ibid.*

- Reducing per capita VMT by 5 percent and vehicle hours traveled per capita by 9 percent
- Increasing transit commuting by 2 percent
- Reducing travel delay per capita by 26 percent
- Creating 264,500 new jobs annually
- Reducing greenfield development by 29 percent by focusing on smart growth
- Locating six more percent household growth in High Quality Transit Areas (HQTAs), which concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability.
- Locating 15 percent more jobs in HQTAs
- Reducing $PM_{2.5}$ emissions by 4.1 percent
- Reducing greenhouse gas (GHG) emissions by 19 percent by 2035

Local

City of Paramount

General Plan Resource Management Element. The Resource Management Element of the City's General Plan was adopted on August 7, 2007, and sets forth the goals, objectives, and policies, which guide the City in the implementation of its air quality improvement programs and strategies. The Resource Management Element acknowledges the interrelationships between transportation and land use planning in meeting the City's mobility and air quality goals. The Resource Management Element includes the following two key policies relating to air quality:

Policy 21: The City of Paramount will continue to cooperate with the other agencies that are charged with improving air and water quality in the region.

Policy 22: The City of Paramount will continue to cooperate with surrounding cities in the formation and implementation of regional resource management plans and programs.

General Plan Environmental Justice Element. The Environmental Justice Element of the City's General Plan includes a comprehensive set of goals and policies aimed at increasing the influence of disadvantaged communities in the public decision-making process and reducing their exposure to environmental hazards. The Environmental

Justice Element includes the following applicable policy related to improving air quality in the City:

Policy EJ-1.1: Truck Idling Restrictions. Designate acceptable and unacceptable areas for freight trucking and diesel truck idling to limit impacts on residential neighborhoods overburdened by air pollution. Require businesses to install signs prohibiting idling. Promote contact information of regulatory agency for reporting violations.

City of Paramount Climate Action Plan. The City adopted its first Climate Action Plan (CAP) in July 2021 that lays out strategies, goals, and actions for reducing municipal and community-wide GHG emissions. A more detailed discussion of this plan is included under Checklist Topic VIII (Greenhouse Gas Emissions)

California Environmental Quality Act. In accordance with CEQA requirements, the City assesses the air quality impacts of new development projects, requires mitigation of potentially significant air quality impacts by conditioning discretionary permits, and monitors and enforces implementation of such mitigation. The City uses the SCAQMD's *CEQA Air Quality Handbook* and SCAQMD's supplemental online guidance/information for the environmental review of development proposals within its jurisdiction.

EXISTING CONDITIONS

Pollutants and Effects

Air quality is defined by ambient air concentrations of seven specific pollutants identified by the USEPA to be of concern with respect to health and welfare of the general public. These specific pollutants, known as "criteria air pollutants," are defined as pollutants for which the federal and State governments have established ambient air quality standards, or criteria, for outdoor concentrations to protect public health. Criteria air pollutants include CO, ground-level O_3, NO_x, sulfur oxides (SO_x), PM_{10}, $PM_{2.5}$, and Pb. The descriptions of each criteria air pollutant and their health effects provided below are based on information provided by the SCAQMD.[10]

Carbon Monoxide (CO). CO is primarily emitted from combustion processes and motor vehicles due to incomplete combustion of fuel. Elevated concentrations of CO weaken the heart's contractions and lower the amount of oxygen carried by the blood. It is especially dangerous for people with chronic heart disease. Inhalation of CO can cause nausea, dizziness, and headaches at moderate concentrations and can be fatal at high concentrations.

Ozone (O_3). O_3 is a gas that is formed when volatile organic compounds (VOCs) and NO_X—both byproducts of internal combustion engine exhaust—undergo slow

[10] *South Coast Air Quality Management District, Final Program Environmental Impact Report for the 2012 AQMP, December 7, 2012.*

photochemical reactions in the presence of sunlight. O_3 concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable. An elevated level of O_3 irritates the lungs and breathing passages, causing coughing and pain in the chest and throat, thereby increasing susceptibility to respiratory infections and reducing the ability to exercise. Effects are more severe in people with asthma and other respiratory ailments. Long-term exposure may lead to scarring of lung tissue and may lower lung efficiency.

Nitrogen Dioxide (NO_2). NO_2 is a byproduct of fuel combustion and major sources include power plants, large industrial facilities, and motor vehicles. The principal form of nitrogen oxide produced by combustion is nitric oxide (NO), which reacts quickly to form NO_2, creating the mixture of NO and NO_2 commonly called NO_X. NO_2 absorbs blue light and results in a brownish-red cast to the atmosphere and reduced visibility. NO_2 also contributes to the formation of PM_{10}. NO_x irritates the nose and throat, and increases one's susceptibility to respiratory infections, especially in people with asthma. The principal concern of NO_X is as a precursor to the formation of O_3.

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

Particulate Matter (PM_{10} and $PM_{2.5}$). The human body naturally prevents the entry of larger particles into the body. However, small particles, with an aerodynamic diameter equal to or less than 10 microns (PM_{10}), and even smaller particles with an aerodynamic diameter equal to or less than 2.5 microns ($PM_{2.5}$), can enter the body and become trapped in the nose, throat, and upper respiratory tract. These small particulates can potentially aggravate existing heart and lung diseases, change the body's defenses against inhaled materials, and damage lung tissue. The elderly, children, and those with chronic lung or heart disease are most sensitive to PM_{10} and $PM_{2.5}$. Lung impairment can persist for two to three weeks after exposure to high levels of particulate matter. Some types of particulates can become toxic after inhalation due to the presence of certain chemicals and their reaction with internal body fluids.

Lead (Pb). Pb is emitted from industrial facilities and from the sanding or removal of old Pb-based paint. Smelting or processing the metal is the primary source of Pb emissions, which is primarily a regional pollutant. Pb affects the brain and other parts of the body's nervous system. Exposure to Pb in very young children impairs the development of the nervous system, kidneys, and blood forming processes in the body.

State-Only Criteria Pollutants

Visibility-Reducing Particles. Deterioration of visibility is one of the most obvious manifestations of air pollution and plays a major role in the public's perception of air quality. Visibility reduction from air pollution is often due to the presence of sulfur and NOX, as well as PM.

Sulfates (SO_4^{2-}). Sulfates are the fully oxidized ionic form of sulfur. Sulfates occur in combination with metal and/or hydrogen ions. In California, emissions of sulfur compounds occur primarily from the combustion of petroleum-derived fuels (e.g., gasoline and diesel fuel) that contain sulfur. This sulfur is oxidized during the combustion process and subsequently converted to sulfate compounds in the atmosphere. Effects of sulfate exposure at levels above the standard include a decrease in ventilatory function, aggravation of asthmatic symptoms, and an increased risk of cardiopulmonary disease. Sulfates are particularly effective in degrading visibility, and, due to fact that they are usually acidic, can harm ecosystems and damage materials and property.

Hydrogen Sulfide (H_2S). H_2S is a colorless gas with the odor of rotten eggs. It is formed during bacterial decomposition of sulfur-containing organic substances. Also, it can be present in sewer gas and some natural gas and can be emitted as the result of geothermal energy exploitation. Breathing H_2S at levels above the state standard could result in exposure to a very disagreeable odor.

Vinyl Chloride. Vinyl chloride is a colorless, flammable gas at ambient temperature and pressure. It is also highly toxic and is classified as a known carcinogen by the American Conference of Governmental Industrial Hygienists and the International Agency for Research on Cancer. At room temperature, vinyl chloride is a gas with a sickly-sweet odor that is easily condensed. However, it is stored at cooler temperatures as a liquid. Due to the hazardous nature of vinyl chloride to human health, there are no end products that use vinyl chloride in its monomer form. Vinyl chloride is a chemical intermediate, not a final product. It is an important industrial chemical chiefly used to produce polyvinyl chloride (PVC). The process involves vinyl chloride liquid fed to polymerization reactors where it is converted from a monomer to a polymer PVC. The final product of the polymerization process is PVC in either a flake or pellet form. Billions of pounds of PVC are sold on the global market each year. From its flake or pellet form, PVC is sold to companies that heat and mold the PVC into end products such as PVC pipe and bottles. Vinyl chloride emissions are historically associated primarily with landfills.

Toxic Air Contaminants (TACs)

TACs refer to a diverse group of "non-criteria" air pollutants that can affect human health but have not had ambient air quality standards established for them. This is not because they are fundamentally different from the pollutants discussed above but because their effects tend to be local rather than regional. TACs are classified as carcinogenic and noncarcinogenic, where carcinogenic TACs can cause cancer and noncarcinogenic TAC

can cause acute and chronic impacts to different target organ systems (e.g., eyes, respiratory, reproductive, developmental, nervous, and cardiovascular). CARB and OEHHA determine if a substance should be formally identified, or "listed," as a TAC in California. A complete list of these substances is maintained on CARB's website.[11]

Diesel PM, which is emitted in the exhaust from diesel engines, was listed by the state as a TAC in 1998. Diesel PM has historically been used as a surrogate measure of exposure for all diesel exhaust emissions. Diesel PM consists of fine particles (fine particles have a diameter less than 2.5 micrometer [µm]), including a subgroup of ultrafine particles (ultrafine particles have a diameter less than 0.1 µm). Collectively, these particles have a large surface area which makes them an excellent medium for absorbing organics. The visible emissions in diesel exhaust include carbon particles or "soot." Diesel exhaust also contains a variety of harmful gases and cancer-causing substances.

Exposure to diesel PM may be a health hazard, particularly to children whose lungs are still developing and the elderly who may have other serious health problems. Diesel PM levels and resultant potential health effects may be higher in close proximity to heavily traveled roadways with substantial truck traffic or near industrial facilities. According to CARB, diesel PM exposure may lead to the following adverse health effects: (1) aggravated asthma; (2) chronic bronchitis; (3) increased respiratory and cardiovascular hospitalizations; (4) decreased lung function in children; (5) lung cancer; and (6) premature deaths for people with heart or lung disease.[12,13]

Project Site

The Project Site is located within the South Coast Air Basin (Basin), named so because of its geographical formation is that of a basin, with the surrounding mountains trapping the air and its pollutants in the valleys or basins below. The 6,745-square-mile Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. It is bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east; and the San Diego County line to the south. Ambient pollution concentrations recorded in Los Angeles County portion of the Basin are among the highest in the four counties comprising the Basin. USEPA has classified Los Angeles County as nonattainment areas for O_3, $PM_{2.5}$, and Pb. This classification denotes that the Basin does not meet the NAAQS for these pollutants. In addition, under the CCAA, the Los Angeles County portion of the Basin is designated as a nonattainment area for O_3, PM_{10}, and $PM_{2.5}$. The air quality within the

---

11 *California Air Resources Board, Toxic Air Contaminant Identification List, www.arb.ca.gov/toxics/id/taclist.htm, last reviewed by CARB July 18, 2011.*

12 *California Air Resources Board, Overview: Diesel Exhaust and Health, www.arb.ca.gov/research/diesel/diesel-health.htm, last reviewed by CARB April 12, 2016.*

13 *California Air Resources Board, Fact Sheet: Diesel Particulate Matter Health Risk Assessment Study for the West Oakland Community: Preliminary Summary of Results, March 2008.*

Basin is primarily influenced by a wide range of emissions sources, such as dense population centers, heavy vehicular traffic, industry, and meteorology.

Air pollutant emissions are generated in the local vicinity by stationary and area-wide sources, such as commercial activity, space and water heating, landscaping maintenance, consumer products, and mobile sources primarily consisting of automobile traffic.

Air Pollution Climatology. The topography and climate of Southern California combine to make the Basin an area of high air pollution potential. During the summer months, a warm air mass frequently descends over the cool, moist marine layer produced by the interaction between the ocean's surface and the lowest layer of the atmosphere. The warm upper layer forms a cap over the cooler surface layer which inhibits the pollutants from dispersing upward. Light winds during the summer further limit ventilation. Additionally, abundant sunlight triggers photochemical reactions which produce O3 and the majority of particulate matter.

Air Monitoring Data. The SCAQMD monitors air quality conditions at 38 source receptor areas (SRA) throughout the Basin. The Project Site is located in SCAQMD's Southeast LA County receptor area. Historical data from the area was used to characterize existing conditions in the vicinity of the Project Site area. Table III-2 shows pollutant levels, state and federal standards, and the number of exceedances recorded in the area from 2018 through 2020. The one-hour state standard for O_3 was exceeded four times during this three-year period. The federal standard was exceeded four times in that same period. In addition, the daily state standard for PM_{10} was exceeded three times in this period. CO and NO_2 levels did not exceed the CAAQS from 2018 to 2020 for 1-hour (and 8-hour for CO).

Existing Health Risk in the Surrounding Area. Based on the MATES-V model, the calculated cancer risk in the Project area (zip code 90723) is approximately 543 in a million.[14] The cancer risk in this area is predominately related to nearby sources of diesel particulate matter (e.g., diesel trucks and traffic on the Artesia Freeway 4,100 feet to the south). In general, the risk at the Project Site is higher than 79 percent of the population across the South Coast Air Basin.

[14] *South Coast Air Quality Management District, Multiple Air Toxics Exposure Study in the South Coast Air Basin (MATES-V), MATES V Interactive Carcinogenicity Map, 2021, https://experience.arcgis.com/experience/79d3b6304912414bb21ebdde80100b23/page/home/?data_id=dataSource_105-a5ba9580e3aa43508a793fac819a5a4d%3A26&views=view_39%2Cview_1, accessed June 15, 2022.*

Table III-2
Ambient Air Quality Data

Pollutants and State and Federal Standards	Maximum Concentrations and Frequencies of Exceedance Standards		
	2018	2019	2020
Ozone (O_3)			
Maximum 1-hour Concentration (ppm)	0.074	0.074	0.105
Days > 0.09 ppm (State 1-hour standard)	0	0	4
Days > 0.070 ppm (Federal 8-hour standard)	0	0	4
Carbon Monoxide (CO)			
Maximum 1-hour Concentration (ppm)	4.7	3.0	N/A
Days > 20 ppm (State 1-hour standard)	0	0	N/A
Maximum 8-hour Concentration (ppm)	2.1	2.1	N/A
Days > 9.0 ppm (State 8-hour standard)	0	0	N/A
Nitrogen Dioxide (NO_2)			
Maximum 1-hour Concentration (ppm)	0.0833	0.0718	0.0753
Days > 0.18 ppm (State 1-hour standard)	0	0	0
PM_{10}			
Maximum 24-hour Concentration (µg/m^3)	84	74	59
Days > 50 µg/m^3 (State 24-hour standard)	4	0	2
$PM_{2.5}$			
Maximum 24-hour Concentration (µg/m^3)	47.1	30.6	39.0
Days > 35 µg/m^3 (Federal 24-hour standard)	2	0	1
Sulfur Dioxide (SO_2)			
Maximum 24-hour Concentration (ppb)	10.5	8.9	N/A
Days > 0.04 ppm (State 24-hour standard)	0	0	N/A

ppm = parts by volume per million of air.
µg/m^3 = micrograms per cubic meter.
N/A = not available at this monitoring station.
Source: SCAQMD annual monitoring data at Southeast LA County subregion (http://www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year) accessed June 15, 2022. As data for this subregion was not available, the highest values from the South Coastal LA County source receptor areas 1-4 were used.

The Office of Environmental Health Hazard Assessment, on behalf of the California Environmental Protection Agency (CalEPA), provides a screening tool called CalEnviroScreen that can be used to help identify California communities disproportionately burdened by multiple sources of pollution. According to CalEnviroScreen, the Project Site (Census tract 6037553802) is located in the 98th percentile, which means the Project Site has an overall environmental pollution burden higher than at least 98 percent of other communities within California.[15]

Sensitive Receptors. Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. CARB

[15] *Office of Environmental Health Hazard Assessment, https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40, accessed June 15, 2022.*

has identified the following groups who are most likely to be affected by air pollution: children less than 14 years of age, the elderly over 65 years of age, athletes, and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive receptors include residences, schools, playgrounds, childcare centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes.

The Project Site is located in an industrial area 460 feet west of the Union Pacific San Pedro subdivision railroad right-of-way. Sensitive receptors closest to the Project Site include, but are not limited to, the following representative sampling:

- Residence, 16201 Minnesota Avenue; 210 feet southwest of the Project Site.
- Residence, 7544 Monroe Street; 260 feet southwest of the Project Site.
- Residences, 16100 block of Garfield Avenue; 730 feet west of the Project Site.
- Residences, 15900 block of Vermont Avenue; 610 feet east of the Project Site.

Existing Project Site Emissions. The Project Site is currently developed with 12,580 square feet of industrial/manufacturing uses. Pollutant emissions associated with the existing uses are shown in Table III-3.

Table III-3
Existing Estimated Daily Operations Emissions

Emissions Source	Daily Emissions (Pounds Per Day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area Sources	0.4	<0.1	0.6	<0.1	<0.1	<0.1
Energy Sources	<0.1	<0.1	0.1	<0.1	<0.1	<0.1
Mobile Sources	0.6	0.2	2.5	<0.1	0.2	<0.1
Regional Total	**1.0**	**0.4**	**3.2**	**<0.1**	**0.2**	**0.1**
Source: DKA Planning, 2022, based on CalEEMod 2022.1 model runs (included in Appendix B).						

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

Less Than Significant Impact. SCAQMD's *CEQA Air Quality Handbook* identifies the following criteria for assessing a project's consistency with the AQMP:

1. Whether the project would result in any of the following:
    a. An increase in the frequency or severity of existing air quality violations; or
    b. Cause or contribute to new air quality violations; or

c. Delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.

2. Would the project exceed the assumptions utilized in preparing the AQMP?

   a. Is the Project consistent with the population and employment growth projections upon which AQMP forecasted emission levels are based;

   b. Does the Project include air quality mitigation measures; or

   c. To what extent is Project development consistent with the AQMP land use policies?

As discussed below, the Project would be consistent with these criteria, and the Project would be consistent with the AQMP. Therefore, no impacts related to this issue would occur as a result of the Project.

Discussion of Criterion 1

As discussed in response to Checklist Question III(b) (Air Quality – Cumulatively Considerable Net Increase of Criteria Pollutant) below, the Project would not generate any pollutant emissions in excess of SCAQMD's significance thresholds. Thus, the Project would not result in an increase in the frequency or severity of existing air quality violations; would not cause or contribute to new air quality violations; or delay the timely attainment of air quality standards or an interim emission reduction specified in the AQMP.

Discussion of Criterion 2

A project is consistent with the AQMP, in part, if the project is consistent with the population, housing, and employment assumptions that were used in the development of the AQMP. In the case of the 2016 AQMP, two sources of data form the basis for the projections of air pollutant emissions: the City of Paramount General Plan and SCAG's 2016-2040 RTP/SCS. The General Plan serves as a comprehensive, long-term plan for future development of the City.

The 2016-2040 RTP/SCS provides socioeconomic forecast projections of regional population growth.[16] The population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on local plans and policies applicable to the specific area; these are used by SCAG in all phases of implementation and review.

Development of the Project would result in relatively few employment positions on-site, as an on-site property manager usually covers an array of administrative and customer-

[16] *The current applicable air quality attainment plan for the region is the 2016 AQMP, which is based on the growth assumptions in the 2016 RTP/SCS. As such, the 2016 RTP/SCS was used as the basis for this analysis.*

facing functions. There may be limited numbers of maintenance staff as well. However, the removal of the existing manufacturing uses would eliminate about eight jobs, likely resulting in no net change in jobs on-site.[17] Thus, the Project's approximately employment impact would not produce job growth that exceeds the capacity that is accommodated in the 2016 AQMP. As a result, the Project would be consistent with the projections in the 2016 AQMP. As discussed in the remainder of this air quality analysis, because the Project would not result in any significant air quality impacts, the Project would not require implementation of any air-quality-related mitigation measures.

With regard to the Project's consistency with the land use policies set forth in the 2016 AQMP, the 2016 AQMP is the current management plan for continued progression toward clean air and compliance with state and federal requirements. It includes a comprehensive strategy aimed at controlling pollution from all sources, including stationary sources, on- and off-road mobile sources, and area sources. The 2016 AQMP also incorporates current scientific information and meteorological air quality models And updates the federally approved 8-hour O_3 control plan with new commitments for short-term NO_X and VOC reductions. The 2016 AQMP includes short-term control measures related to facility modernization, energy efficiency, good management practices, market incentives, and emissions growth management.

As demonstrated in response to Checklist Question III(b) (Air Quality – Cumulatively Considerable Net Increase of Criteria Pollutant) below, the Project would not result in significant regional emissions. The 2016 AQMP adapts previously conducted regional air quality analyses to account for the recent unexpected drought conditions and presents a revised approach to demonstrated attainment of the 2006 24-hour $PM_{2.5}$ NAAQS for the Basin. The Project would be required to comply with all new and existing regulatory measures set forth by the SCAQMD. Implementation of the Project would not interfere with air pollution control measures listed in the 2016 AQMP.

The Project Site has a General Plan land use designation of Area Plan: Central Industrial District, a classification that allows self-storage uses such as that proposed by the Project. As such, the 2016-2020 RTP/SCS' assumptions about growth in the City accommodate the projected jobs on the Project Site. As a result, the Project would be consistent with the growth assumptions in the City's General Plan. Because the AQMP accommodates growth forecasts from local General Plans, the emissions associated with this Project are accounted for and mitigated in the region's air quality attainment plans. The air quality impacts of development on the Project Site are accommodated in the region's emissions inventory for the 2016-2020 RTP/SCS and 2016 AQMP. Therefore, Project impacts with respect to AQMP consistency would be less than significant.

---

17 *Prepared by The Natelson Company, Inc. for the Southern California Association of Governments, Employment Density Study Summary Report; October 2001. Assumes 1,518 square feet average per light manufacturing employee.*

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

Less Than Significant Impact. Individual projects that generate emissions that do not exceed SCAQMD's significance thresholds would not contribute considerably to any potential cumulative impact. SCAQMD neither recommends quantified analyses of the emissions generated by a set of cumulative development projects nor provides thresholds of significance to be used to assess the impacts associated with these emissions.

SCAQMD Thresholds

The following criteria set forth in SCAQMD's *CEQA Air Quality Handbook* serve as quantitative air quality standards to be used to evaluate project impacts under the Appendix G Thresholds:

Construction

- Regional emissions from both direct and indirect sources would exceed any of the following SCAQMD prescribed threshold levels: (1) 100 pounds per day for NO_X; (2) 75 pounds a day for VOC; (3) 150 pounds per day for PM_{10} or SO_X; (4) 55 pounds per day for $PM_{2.5}$; and (5) 550 pounds per day for CO.

- Maximum on-site daily localized emissions exceed the LST, resulting in predicted ambient concentrations in the vicinity of the Project Site greater than the most stringent ambient air quality standards for CO (20 ppm [23,000 µg/m^3] over a 1-hour period or 9.0 ppm [10,350 µg/m^3] averaged over an 8-hour period) and NO_2 (0.18 ppm [339 µg/m^3] over a 1-hour period, 0.1 ppm [188 µg/m^3] over a three-year average of the 98th percentile of the daily maximum 1-hour average, or 0.03 ppm [57 µg/m^3] averaged over an annual period).

- Maximum on-site localized PM_{10} or $PM_{2.5}$ emissions during construction exceed the applicable LSTs, resulting in predicted ambient concentrations in the vicinity of the Project Site exceeding the incremental 24-hour threshold of 10.4 µg/m^3 or 1.0 µg/m^3 PM_{10} averaged over an annual period.

Operation

- Operational emissions exceed 10 tons per year of volatile organic gases or any of the following SCAQMD prescribed threshold levels: (1) 55 pounds a day for VOC; (2) 55 pounds per day for NO_X; (3) 550 pounds per day for CO; (4) 150 pounds per day for SO_X; (5) 150 pounds per day for PM_{10}; and (6) 55 pounds per day for $PM_{2.5}$.

- Maximum on-site daily localized emissions exceed the LST, resulting in predicted ambient concentrations in the vicinity of the Project Site greater than the most stringent ambient air quality standards for CO (20 parts per million (ppm) over a 1-

hour period or 9.0 ppm averaged over an 8-hour period) and NO_2 (0.18 ppm over a 1-hour period, 0.1 ppm over a 3-year average of the 98th percentile of the daily maximum 1-hour average, or 0.03 ppm averaged over an annual period).

- Maximum on-site localized operational PM_{10} and $PM_{2.5}$ emissions exceed the incremental 24-hour threshold of 2.5 µg/m^3 or 1.0 µg/m^3 PM_{10} averaged over an annual period.

- The Project causes or contributes to an exceedance of the California 1-hour or 8-hour CO standards of 20 or 9.0 ppm, respectively; or

- The Project creates an odor nuisance pursuant to SCAQMD Rule 402.

Construction Emissions

Construction-related emissions were estimated using SCAQMD's CalEEMod 2022.1 model using assumptions from the Project Applicant, including the Project's construction schedule of approximately 15 months (refer to Table 3-1 in Section 3 [Project Description]).

The City would require the Project to comply with the following:

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

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

- SCAQMD Rule 402, which states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other materials which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

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

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

As shown in Table III-4, construction of the Project would not produce regional or localized criteria pollutant emissions in excess of the SCAQMD's regional thresholds. Therefore,

the Project's construction-related emissions impacts would not be cumulatively considerable.

Operational Emissions

Operational criteria pollutant emissions would come from area sources and mobile sources associated with the Project. Area sources include natural gas for space heating and water heating, gasoline-powered landscaping and maintenance equipment, consumer products, such as household cleaners, and architectural coatings for routine maintenance. Additionally, the Project could add up to 90 net vehicle trips on a peak weekday at the start of operations in 2024.[18]

As shown in Table III-5, operation of the Project would not generate regional or localized criteria pollutant emissions in excess of SCAQMD's significance thresholds. Therefore, the Project's operation-related emissions impacts would not be cumulatively considerable.

Table III-4
Estimated Daily Construction Emissions

Construction Phase Year	*Pounds Per Day*					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
2023	1.4	14.4	16.9	<0.1	3.1	1.7
2024	24.0	11.0	13.4	<0.1	1.5	0.7
Maximum Regional Total	**24.0**	**14.4**	**16.9**	**<0.1**	**1.5**	**0.7**
Regional Significance Threshold	75	100	550	150	150	55
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Maximum Localized Total	**N/A**	**12.6**	**11.4**	**N/A**	**0.6**	**0.6**
Localized Significance Threshold	N/A	81	735	N/A	13	4
Exceed Threshold?	**N/A**	**No**	**No**	**N/A**	**No**	**No**

Note: The estimated construction dates were used for the purposes of modeling air quality emissions using the CalEEMod software. If construction activities commence later than what was assumed in this environmental analysis, the actual emissions would be lower than analyzed, because of the increasing penetration of newer equipment with lower certified emission levels. This analysis assumes implementation of SCAQMD Rule 403 (Fugitive Dust Emissions).

Source: DKA Planning, 2022 based on CalEEMod 2022.1 model runs. LST analyses based on 1-acre site with 50-meter distances to receptors in Southeast LA County source receptor area. Estimates reflect the peak summer or winter season, whichever is higher. Refer to Appendix B.

[18] *Linscott, Law & Greenspan Engineers, Memorandum - Go Store It Paramount Project Transportation and Parking Assessment; June 2022. Refer to Appendix H.*

Table III-5
Estimated Daily Project Operational Emissions

Emissions Source	Pounds Per Day					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Area Source	1	<1	<1	<1	<1	<1
Energy Source	<1	1	1	<1	<1	<1
Mobile Source	2	2	16	<1	3	1
Total Regional Operational Emissions	***3***	***3***	***17***	***<1***	***3***	***1***
SCAQMD Regional Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Total Localized Operational Emissions	***1***	***1***	***1***	***<1***	***<1***	***<1***
SCAQMD Localized Threshold	*N/A*	*81*	*735*	*N/A*	*3*	*1*
Exceed Threshold?	**N/A**	**No**	**No**	**N/A**	**No**	**No**
Source: DKA Planning, 2021. Refer to Appendix B.						

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. As discussed previously, sensitive receptors closest to the Project Site include the following:

- Residence, 16201 Minnesota Avenue; 210 feet southwest of the Project Site.
- Residence, 7544 Monroe Street; 260 feet southwest of the Project Site.
- Residences, 16100 block of Garfield Avenue; 730 feet west of the Project Site.
- Residences, 15900 block of Vermont Avenue; 610 feet east of the Project Site.

As discussed in response to Checklist Question III(b) (Air Quality – Cumulatively Considerable Net Increase of Criteria Pollutant), in terms of localized emissions, the Project would not produce localized criteria pollutant emissions in excess the SCAQMD's recommended localized standards of significance.

When the Project is operational, the traffic volumes at any study intersections would be well below the daily traffic volumes that would be needed to generate CO exceedances of the ambient air quality standard.[19] Thus, Project traffic would not have the potential to result in CO hotspots.

For these reasons, the Project would not expose sensitive receptors to substantial pollutant concentrations. Therefore, Project impacts related to this issue would be less than significant.

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

Less Than Significant Impact. During the Project's construction phase, conventional construction methods, equipment, and materials would be used. Odors, such as those associated with dust and equipment emissions would be localized and temporary and would not be sufficient to affect a substantial number of people. As a self-storage facility, the Project would not generate odors. Thus, the Project would not create objectionable odors affecting a substantial number of people. Therefore, Project impacts related to this issue would be less than significant.

Cumulative Impacts

Cumulative air quality impacts are discussed in response to Checklist Question III(b) (Air Quality – Cumulatively Considerable Net Increase of Criteria Pollutant). As discussed there, SCAQMD recommends that any construction-related emissions and operational emissions from individual development projects that exceed the project-specific mass daily emissions thresholds identified above also would be considered cumulatively considerable. Individual projects that generate emissions below SCAQMD's significance thresholds would not contribute considerably to any potential cumulative impact. As the Project's emissions during construction and operation would not exceed any applicable significance threshold, the Project's contribution to any cumulative air quality impacts would not be considerable, and cumulative impacts related to air quality would be less than significant.

Mitigation Measures

No significant impacts related to air quality have been identified, and no mitigation measures are required.

---

[19] *South Coast Air Quality Management District; 2003 AQMP. As discussed in the 2003 AQMP, the 1992 CO Plan included a CO hotspot analysis at four intersections in the peak A.M. and P.M. time periods, including Long Beach Boulevard and Imperial Highway (Lynwood), Wilshire Boulevard and Veteran Avenue (Westwood), Sunset Boulevard and Highland Avenue (Hollywood), and La Cienega Boulevard and Century Boulevard (Inglewood). The busiest intersection was Wilshire and Veteran, used by 100,000 vehicles per day. The 2003 AQMP estimated a 4.6 ppm one-hour concentration at this intersection, which meant that an exceedance (20 ppm) would not occur until daily traffic exceeded more than 400,000 vehicles per day.*

IV. BIOLOGICAL RESOURCES

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

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

No Impact. The Project Site is located in an urbanized area of the City and is surrounded by existing urban development. The Project Site is completely developed with 12,850 square feet of industrial/manufacturing uses. No biological resources exist at the Project Site or in the immediate vicinity of the site. Thus, the Project would not have substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Therefore, no impacts related to this issue would occur as a result of the Project.

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

No Impact. The Project Site is located in an urbanized area of the City and is surrounded by existing urban development. The Project Site is completely developed with 12,850 square feet of industrial/manufacturing uses. No riparian habitat or other sensitive natural community exist at the Project Site or in the immediate vicinity of the site. Thus, the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Therefore, no impacts related to this issue would occur as a result of the Project. No mitigation measures are required.

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

No Impact. The Project Site is located in an urbanized area of the City and is surrounded by existing urban development. The Project Site is completely developed with 12,850 square feet of industrial/manufacturing uses. No wetlands exist at the Project Site or in the immediate vicinity of the site. Thus, the Project would not have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. Therefore, no impacts related to this issue would occur as a result of the Project. No mitigation measures are required.

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

No Impact. The Project Site is located in an urbanized area of the City and is surrounded by existing urban development. The Project Site is completely developed with 12,850 square feet of industrial/manufacturing uses. The Project Site is no part of a migratory wildlife corridor or native wildlife nursery. Thus, the Project would not 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. Therefore, no impacts related to this issue would occur as a result of the Project. No mitigation measures are required.

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

No Impact. The Project Site is located in an urbanized area of the City and is surrounded by existing urban development. The Project Site is completely developed with 12,850 square feet of industrial/manufacturing uses. No trees are located on the Project Site, and no tree removal would occur as part of the Project. Thus, the Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. Therefore, no impacts related to this issue would occur as a result of the Project. No mitigation measures are required.

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

No Impact. The Project Site is not subject to a Habitat Conservation Plan, a Natural Community Conservation Plan, or other such plan. Therefore, the Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, no impacts related to this issue would occur as a result of the Project. No mitigation measures are required.

Cumulative Impacts

There are six related projects in the City (refer to Appendix A). All six related projects sites are infill sites that are currently developed or are undergoing development and do not contain any protected species or natural communities/habitats. Any of the related projects that require tree removal and replacement would be required to comply with the City's tree replacement requirements and the Migratory Bird Treaty Act (MBTA) related to nesting birds to ensure that no significant impacts related to trees or nesting birds would occur. Therefore, cumulative impacts on biological resources would not be significant.

Mitigation Measures

No significant impacts related to biological resources have been identified, and no mitigation measures are required.

V. CULTURAL RESOURCES

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

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

No Impact. A search through the California Office of Historic Preservation, California Historical Resources database indicated that none of the existing buildings located on or adjacent to the Project Site are listed in the National Register of Historic Places or the California Register of Historic Places. Thus, the Project would not cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5. Therefore, no impacts related to historic resources would occur as a result of the Project.

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?

Less Than Significant With Mitigation Incorporated. The Project Site is located in an urbanized area of the City and is surrounded by existing urban development. The Project Site is completely developed with 12,850 square feet of industrial/manufacturing uses. The Project includes the demolition and removal of the existing buildings from the Project Site and the development of the site with a 104,630-square-foot self-storage building. The Project does not include any subterranean levels, so no excavation of the Project Site would occur. The Project would require minor grading, resulting in the export of approximately 1,500 cubic yards of soil. Although no archaeological resources are known to exist at the Project Site, given that archaeological resources existing throughout the Project region, it is possible that unknown archaeological resources could be encounter at the site, although unlikely given the shallow depth of proposed grading. However, the Project Applicant would be required to implement Mitigation Measure ARCHEO-1, which would ensure that potential Project impacts related to the inadvertent discovery of unknown archaeological resource would be less than significant.

c) Would the project disturb any human remains, including those interred outside of formal cemeteries?

Less Than Significant Impact. The Project Site is located in an urbanized area of the City and is surrounded by existing urban development. The Project Site is completely developed with 12,850 square feet of industrial/manufacturing uses. The Project includes the demolition and removal of the existing buildings from the Project Site and the development of the site with a 104,630-square-foot self-storage building. The Project does not include any subterranean levels, so no excavation of the Project Site would occur. The Project would require minor grading, resulting in the export of approximately 1,500 cubic yards of soil. If unknown human remains exist at the site, it is unlikely the Project's grading would unveil such remains. However, in the event that unknown human remains are encountered at the Project Site, the Project Applicant would be required to comply with the State's Health and Safety Code Section 7050.5, in the event of discovery or recognition of any human remains at the Project Sites, no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the Los Angeles County Coroner has determined, in accordance with Chapter 10 (commencing with Section 27460) of Part 3 of Division 2 of Title 3 of the Government Code, that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in Section 5097.98 of the Public Resources Code. The coroner shall make his or her determination within two working days from the time the person responsible for the excavation or his or her authorized representative notifies the coroner of the discovery or recognition of the human remains. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission (NAHC). Through compliance with existing regulatory standards, Project impacts on human remains would be less than significant.

Cumulative Impacts

Impacts related to cultural resources tend to be site-specific and are assessed on a site-by-site basis. The Project and the related projects do not share any cultural resources in common. For this reason, no cumulative impacts related to cultural resources would occur as a result of implementation of the Project and related projects.

Mitigation Measures

To ensure that Project impacts related to unknown archaeological resources would be less than significant, the following mitigation measure is required:

ARCHEO-1 If any archaeological materials are encountered during the course of Project development, all further development activity in the vicinity of the materials shall halt and:

- The services of an archaeologist shall then be secured by contacting the South Central Coastal Information Center (657-278-5395) located at California State University Fullerton, or a member of the Society of Professional Archaeologist (SOPA) or a SOPA-qualified archaeologist, who shall assess the discovered material(s) and prepare a survey, study, or report evaluating the impact;

- The archaeologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource; and

- The Project Applicant shall comply with the recommendations of the evaluating archaeologist, as contained in the survey, study, or report

- Project development activities may resume once copies of the archaeological survey, study or report are submitted to:

  SCCIC Department of Anthropology
  McCarthy Hall 477
  CSU Fullerton
  800 North State College Boulevard
  Fullerton, CA 92834

- Prior to the issuance of any building permit, the Project Applicant shall submit a letter to the case file indicating what, if any, archaeological reports have been submitted, or a statement indicating that no material was discovered.

- A covenant and agreement binding the Project Applicant to this condition shall be recorded prior to the issuance of a grading permit.

VI. ENERGY

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

a) Would the project result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less Than Significant Impact. Electricity is provided to the Project Site by Southern California Edison (SCE). Natural gas is provided to the Project Site by The Southern California Gas Company (The Gas Company). Both forms of energy are provided to the Project Site via existing infrastructure located adjacent to the site. The Project would be served by this infrastructure and would not require the need for new, expanded, or relocated energy infrastructure. For the reasons discussed below, Project impacts related to energy would be less than significant.

Construction

During Project construction, energy would be consumed in the form of electricity associated with the conveyance of water used for dust control and on a limited basis, powering lights, electronic equipment, or other construction activities necessitating electrical power. Construction activities typically do not involve the consumption of natural gas. Project construction would also consume energy in the form of petroleum-based fuels associated with the use of off-road construction vehicles and equipment on the Project Site, construction worker travel to and from the Project Site, and delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities).

As shown in Table VI-1, Project construction would consume approximately 11,739 gallons of gasoline and 14,286 gallons of diesel. Project construction is expected to be completed in 2024.

Table VI-1
Summary of Energy Use For Project Construction[1]

Fuel Type	Quantity
Electricity	
Water Consumption (Dust Control)	217 kWh
Gasoline	
On-Road Construction Equipment	11,739 gallons
Off-Road Construction Equipment	0 gallons[2]
Total Gasoline	***11,739 gallons***
Diesel	
On-Road Construction Equipment	7,544 gallons
Off-Road Construction Equipment	6,742 gallons
Total Diesel	***14,286 gallons***
Total Petroleum-Based Fuel	**26,025 gallons**

kWh = kilowatt-hours

[1] *Detailed calculations are included in Appendix C.*
[2] *Off-road construction equipment uses diesel fuel.*

As shown in Table VI-1, a total of approximately 217 kWh of electricity is anticipated to be consumed during Project construction. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption.

Construction activities, including the construction of the new building, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be supplied to support Project construction activities. Thus, there would be no demand generated by construction.

The petroleum-based fuel use summary provided in Table VI-1 represents the amount of transportation energy that could potentially be consumed during Project construction based on a conservative set of assumptions outlined in Appendix C. As shown, on- and off-road vehicles would consume an estimated 11,739 gallons of gasoline and approximately 14,286 gallons of diesel fuel throughout the Project's construction.

The Project would utilize construction contractors who demonstrate compliance with applicable CARB regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. CARB has adopted an Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel PM and other TACs. This measure prohibits diesel-fueled commercial vehicles greater than 10,000 pounds from idling for more than five minutes at any given time.[20] CARB has also approved the Truck and Bus regulation

[20] *CARB, https://ww2.arb.ca.gov/our-work/programs/atcm-to-limit-vehicle-idling/about, accessed, May 6, 2022.*

(CARB Rules Division 3, Chapter 1, Section 2025, subsection (h)) to reduce NO_X, PM_{10}, and $PM_{2.5}$ emissions from existing diesel vehicles operating in California; this regulation will be phased in with full implementation by 2023.[21] In addition to limiting exhaust from idling trucks, CARB promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower. The regulation aims to reduce emissions by requiring the installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models. Implementation began January 1, 2014, and the compliance schedule requires that best available control technology turnovers or retrofits be fully implemented by 2023 for large and medium equipment fleets and by 2028 for small fleets. Compliance with the above anti-idling and emissions regulations would result in efficient use of construction-related energy and the minimization or elimination of wasteful and unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment would result in less fuel combustion and energy consumption, as would use of haul trucks with larger capacities.

Operation

During operation of the Project, energy would be consumed for multiple purposes, including, but not limited to HVAC, lighting, and the use of electronics, equipment, and machinery. Energy would also be consumed during Project operations related to water usage, solid waste disposal, and vehicle trips. As shown in Table VI-2 the Project would result in a net increase in electricity consumption of approximately 1,743,860 kWh per year when compared to the existing industrial/manufacturing use. As shown in Table VI-3, the Project would result in a net increase in natural gas consumption of approximately 2,241,503 1,000 British thermal units (kBTU) per year when compared to the existing industrial/manufacturing use. As shown in Table VI-4, the Project would result in a net increase in fuel of approximately 8,304 gallons per year when compared to the existing hotel use.

The Project's operation would not result in an increase in demand for electricity and natural gas that exceeds available supply or distribution infrastructure capabilities that could result in the relocation or construction of new or expanded electrical power and natural gas facilities, the construction of which would cause significant environmental effects. Additionally, the Project would be required to comply with the City's Green Building Code standards, which would ensure energy and water efficiency measures are incorporated into the Project. For these reasons, Project Impacts related to energy would be less than significant.

21 *California Air Resources Board, Final Regulation Order, Amendments to the Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and Other Criteria Pollutants from In-Use On-Road Diesel-Fueled Vehicles, http://www.arb.ca.gov/msprog/onrdiesel/documents/tbfinalreg.pdf.*

Table VI-2
Estimated Project Electricity Demand[1]

Land Use	Size	Total (kw-h/yr)
Existing		
Industrial/Manufacturing	12,850 sf	120,677
Project		
Self-Storage	104,630 sf	1,864,537
	Less Existing	*(120,677)*
	Net Total	**1,743,860**

kw-h = kilowatt-hour yr = year sf =square feet

[1] *Calculated via CalEEMod. Refer to Appendix C.*

Table VI-3
Estimated Project Natural Gas Demand[1]

Land Use	Size	Total (kBTU/yr)
Existing		
Industrial/Manufacturing	12,850 sf	536,533
Project		
Self-Storage	104,630 sf	2,778,036
	Less Existing	*(536,533)*
	Net Total	**2,241,503**

kBTU = 1,000 British Thermal Units yr = year sf =square feet

[1] *Calculated via CalEEMod. Refer to Appendix C.*

Table VI-4
Estimated Project Transportation Petroleum-Based Fuel

Fuel Type	Gallons Per Year
Existing	
Gasoline	2,548
Diesel	722
Total Existing Fuel Use	***3,271***
Project	
Gasoline	9,370
Less Existing	*(2,548)*
Net Total Gasoline Use	***6,652***
Diesel	2,658
Less Existing	*(722)*
Net Total Diesel Use	***1,652***
Net Total Fuel Use	**8,304**
Detailed calculations are included in Appendix C.	

b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

No Impact. The Project would comply with the City's Green Building Standards Code, which outlines mandatory and voluntary efficiency measures for non-residential uses. Regulatory compliance with the City's Green Building Standards Code would ensure the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, no impacts related to this issue would occur as a result of the Project.

Cumulative Impacts

The geographic context for the cumulative analysis of energy is the service areas of SCE and The Gas Company. Growth within these service areas is anticipated to increase the demand for energy and associated infrastructure. As with the Project, development in the service areas would be required to incorporate energy conservation features in order to comply with applicable mandatory regulations including CALGreen and state energy standards in Title 24, and incorporate additional reduction measures, as necessary. Therefore, cumulative energy impacts would be less than significant.

Mitigation Measures

No significant impacts related to energy have been identified, and no mitigation measures are required.

VII. GEOLOGY AND SOILS

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

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

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

No Impact. The Project Site is not located within an Alquist-Priolo Earthquake Fault Zone, and no known faults exist on the Project Site.[22] The closest active faults to the Project Site are the Puente Hills Blind Thrust Fault and the Newport Inglewood faults.[23] Thus, the Project would not directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault on the Project Site. Therefore, no impacts related to this issue would occur as a result of the Project.

ii) Strong seismic ground shaking caused in whole or in part by the project's exacerbation of the existing environmental conditions?

Less Than Significant Impact. Given the Project Site's location in a seismically active region, the Project Site could experience seismic ground shaking in the event of an earthquake. As stated previously, the closest active faults to the Project Site are the Puente Hills Blind Thrust Fault and the Newport Inglewood faults.[24] However, the Project Applicant would be required to design and construct the Project in conformance to the most recently adopted Building Code standards and applicable recommendations made in the *Due Diligence Geotechnical Evaluation Report* prepared for the Project, dated February 8, 2022, and any future updates. Conformance with the City's current Building Code standards would minimize the potential for structural failure, injury, and loss of life during an earthquake event and thus, not cause or accelerate geologic hazards or expose people to substantial risk of injury. Therefore, Project impacts related to groundshaking would be less than significant.

iii) Seismic-related ground failure, including liquefaction, caused in whole or in part by the project's exacerbation of the existing environmental conditions?

Less Than Significant Impact. The State of California Geologic Survey Seismic Hazard Zone Map and the Los Angeles County Liquefaction Zone Map indicates the Project Site is located within a liquefaction zone. The site is expected to be subject to liquefaction

---

22 *Due Diligence Geotechnical Evaluation Report, Kling Consulting Group, Inc., February 8, 2022. Refer to Appendix D.*

23 *Ibid.*

24 *Ibid.*

hazards.[25] However, the Project Applicant would be required to design and construct the Project in conformance to the most recently adopted Building Code standards and applicable recommendations made in the *Due Diligence Geotechnical Evaluation Report* prepared for the Project, dated February 8, 2022, and any future updates. Conformance with the City's current Building Code standards would minimize the potential for structural failure, injury, and loss of life during an earthquake event and thus, not cause or accelerate geologic hazards or expose people to substantial risk of injury. Thus, the Project would not directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction, caused in whole or in part by the Project's exacerbation of the existing environmental conditions. Therefore, Project impacts related to seismic-related ground failure would be less than significant.

iv) Landslides caused in whole or in part by the project's exacerbation of the existing environmental conditions?

No Impact. The topography of the Project Site and surrounding area is flat. No landslides are located on or near the Project Site. Thus, the Project would not directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving landslides. Therefore, no impacts related to this issue would occur as a result of the Project.

b) Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. In its existing condition, the Project Site is completely developed with impervious surfaces (i.e., buildings and asphalt/concrete). During storm events, stormwater that encounters the Project Site sheet flows to Minnesota Avenue and to the City's local storm drain system. For the Project's construction and operational phases, the Project Applicant would be required to prepare a Low Impact Development (LID) report that outlines construction and post-construction Best Management Practices (BMPs) that would prevent erosion during the Project's construction and operational phases. Per Chapter 8.20 of the City's Municipal Code, no person shall commence any construction activity for which a permit is required by Chapter 10 of this code without implementing all stormwater and runoff pollution measures required by such permit. The Project Applicant would be required to adhere to the minimum BMPs for the construction site. That could include limiting grading during rain events; planting vegetation on slopes; covering slopes susceptible to erosion; maintaining stockpiles of soil on-site; and containing runoff, spills, and equipment on-site. Adherence to the good housekeeping provisions and the construction BMPs would ensure that the Project would not result in substantial erosion or loss of topsoil. Post-construction BMPs could include measures designed to control pollutants, pollutant loads, and runoff volume to the maximum extent feasible by minimizing impervious surface area and controlling runoff from impervious surfaces through infiltration, evapotranspiration, bioretention, and/or rainfall harvest and

[25] *Ibid.*

use. The LID report would also outline standards and practices for stormwater pollution mitigation and provide documentation to demonstrate compliance with the municipal National Pollutant Discharge Elimination System (NPDES) permit on Project plans and permit applications submitted to the City. Through compliance with existing regulations, Project impacts related to erosion would be less than significant.

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

Less Than Significant Impact. As discussed in response to Checklist Question VII(a)(iii) (Geology and Soils – Seismic-Related Ground Failure), the State of California Geologic Survey Seismic Hazard Zone Map and the Los Angeles County Liquefaction Zone Map indicates the Project Site is located within a liquefaction zone. The Project Site is expected to be subject to liquefaction hazards, including seismically-induced settlement and seismically-induced lateral displacement.[26] However, the Project Applicant would be required to design and construct the Project in conformance to the most recently adopted Building Code standards and applicable recommendations made in the *Due Diligence Geotechnical Evaluation Report* prepared for the Project, dated February 8, 2022, and any future updates. Conformance with the City's current Building Code standards would minimize risks associated with site conditions. Therefore, Project impacts related to geologic/soil instability would be less than significant.

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

Less Than Significant Impact. Subsurface soils at the Project Site likely consist of interbedded sand, silt, and clay. While sandy soils are generally not susceptible to expansion, the potential exists that layers of expansive clay could be present at the building's foundation elevation. However, the Project Applicant would be required to design and construct the Project in conformance to the most recently adopted Building Code standards and applicable recommendations made in the *Due Diligence Geotechnical Evaluation Report* prepared for the Project, dated February 8, 2022, and any future updates. Conformance with the City's current Building Code standards would minimize potential risks associated with expansive soil. Therefore, Project impacts related to expansive soil would be less than significant.

[26] *Ibid.*

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

No Impact. The Project would connect to the City's existing sewer system and would not require the use of septic tanks or alternative wastewater disposal systems. Thus, the Project would not result in any impacts related to soils that are incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. Therefore, no impacts related to this issue would occur as a result of the Project. No mitigation measures are required.

f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant With Mitigation Incorporated. The Project Site is located in an urbanized area of the City and is surrounded by existing urban development. The Project Site is completely developed with 12,850 square feet of industrial/manufacturing uses. The Project includes the demolition and removal of the existing buildings from the Project Site and the development of the site with a 104,630-square-foot self-storage building. The Project does not include any subterranean levels, so no excavation of the Project Site would occur. The Project would require minor grading, result in the export of approximately 1,500 cubic yards of soil. A database search conducted by the Los Angeles County of Natural History Museum indicates that no known paleontological resources exist at the Project Site.[27] However, such resources have been found in sedimentary deposits, which occur at the Project Site, in the surrounding area. If unknown paleontological resources exist at the site, it is unlikely the Project's grading would unveil such resources. However, the Project Applicant would be required to implement Mitigation Measure PALEO-1, which would ensure that potential Project impacts related to unknown paleontological resources would be less than significant.

Cumulative Impacts

Geotechnical impacts related to future development in the City involve hazards related to site-specific soil conditions, erosion, and ground-shaking during earthquakes. The impacts on each site are specific to that site and its users and would not be in common or contribute to (or shared with, in an additive sense) the impacts on other sites. In addition, development on each site is subject to uniform site development and construction standards that are designed to protect public safety. Therefore, cumulative geotechnical impacts related would be less than significant.

---

27 *Natural History Museum of Los Angeles County, Alyssa Bell, correspondence, July 17, 2022. Refer to Appendix D.*

Mitigation Measures

The following mitigation measure is required to ensure that Project impacts related to unknown paleontological resources would be less than significant:

PALEO-1 If paleontological resources are encountered, the Applicant shall area of the find until a qualified paleontologist evaluates the find. Construction activity may continue unimpeded on other portions of the Project Site. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. The found deposits shall be treated in accordance with federal, state, and local guidelines, including those set forth in PRC Section 5097.5.

VIII. GREENHOUSE GAS EMISSIONS

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

The analysis provided below is primarily based on technical data prepared by DKA Planning (refer to Appendix E).

ENVIRONMENTAL SETTING

Global climate change refers to changes in average climatic conditions on Earth as a whole, including changes in temperature, wind patterns, precipitation, and storms. Global warming, a related concept, is the observed increase in average temperature of Earth's surface and atmosphere. One identified cause of global warming is an increase of greenhouse gas (GHG) emissions in the atmosphere. GHG emissions are those compounds in Earth's atmosphere that play a critical role in determining Earth's surface temperature.

Earth's natural warming process is known as the "greenhouse effect." It is called the greenhouse effect because Earth and the atmosphere surrounding it are similar to a greenhouse with glass panes in that the glass allows solar radiation (sunlight) into Earth's atmosphere but prevents radiative heat from escaping, thus warming Earth's atmosphere. Some levels of GHG emissions keep the average surface temperature of Earth close to a hospitable 60 degrees Fahrenheit. However, it is believed that excessive concentrations of anthropogenic GHG emissions in the atmosphere can result in increased global mean temperatures, with associated adverse climatic and ecological consequences.

Scientists studying the particularly rapid rise in global temperatures have determined that human activity has resulted in increased emissions of GHG emissions, primarily from the burning of fossil fuels (from motor vehicle travel, electricity generation, consumption of natural gas, industrial activity, manufacturing), deforestation, agricultural activity, and the decomposition of solid waste. Scientists refer to the global warming context of the past century as the "enhanced greenhouse effect" to distinguish it from the natural greenhouse effect.

Global GHG emissions due to human activities have grown since pre-industrial times. As reported by the USEPA, global carbon emissions from fossil fuels increased by over 16 times between 1900 and 2008 and by about 1.5 times between 1990 and 2008. In addition, in the Global Carbon Budget 2014 report, published in September 2014, atmospheric CO_2 concentrations in 2013 were found to be 43 percent above the concentration at the start of the Industrial Revolution, and the present concentration is the highest during at least the last 800,000 years. Global increases in CO_2 concentrations are due primarily to fossil fuel use, with land use change providing another significant but smaller contribution. With regard to emissions of non-CO_2 GHG, these have also increased significantly since 1990. In particular, studies have concluded that it is very likely that the observed increase in methane (CH_4) concentration is predominantly due to agriculture and fossil fuel use.

In August 2007, international climate talks held under the auspices of the United Nations Framework Convention on Climate Change (UNFCCC) led to the official recognition by the participating nations that global GHG emissions must be reduced. According to the "Ad Hoc Working Group on Further Commitments of Annex I Parties under the Kyoto Protocol," avoiding the most catastrophic events forecast by the United Nations Intergovernmental Panel on Climate Change (IPCC) would entail emissions reductions by industrialized countries in the range of 25 to 40 percent below 1990 levels. Because of the Kyoto Protocol's Clean Development Mechanism, which gives industrialized countries credit for financing emission-reducing projects in developing countries, such an emissions goal in industrialized countries could ultimately spur efforts to cut emissions in developing countries as well.

With regard to the adverse effects of global warming, as reported by SCAG, "Global warming poses a serious threat to the economic well-being, public health and natural environment in southern California and beyond. The potential adverse impacts of global warming include, among others, a reduction in the quantity and quality of water supply, a rise in sea level, damage to marine and other ecosystems, and an increase in the incidences of infectious diseases. Over the past few decades, energy intensity of the national and state economy has been declining due to the shift to a more service-oriented economy. California ranked fifth lowest among the states in CO_2 emissions from fossil fuel consumption per unit of Gross State Product. However, in terms of total CO_2 emissions, California is second only to Texas in the nation and is the 12th largest source of climate change emissions in the world, exceeding most nations. Southern California, with close to half of the state's population and economic activities, is also a major contributor to the global warming problem."

GHG Emissions Background. GHG emissions include CO_2, CH_4, nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), and nitrogen trifluoride (NF_3). CO_2 is the most abundant GHG. Other GHG emissions are less abundant but have higher global warming potential than CO_2. Thus, emissions of other GHG emissions are frequently expressed in the equivalent mass of CO_2, denoted as CO_2e. Forest fires, decomposition, industrial processes, landfills, and consumption of

fossil fuels for power generation, transportation, heating, and cooking are the primary sources of GHG emissions. A general description of the GHG emissions is provided in Table VIII-1.

Table VIII-1
Description of Identified GHG Emissions[a]

Greenhouse Gas	General Description
Carbon Dioxide (CO_2)	An odorless, colorless GHG, which has both natural and anthropocentric sources. Natural sources include the following: decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic (human caused) sources of CO_2 are burning coal, oil, natural gas, and wood.
Methane (CH_4)	A flammable gas and is the main component of natural gas. When one molecule of CH_4 is burned in the presence of oxygen, one molecule of CO_2 and two molecules of water are released. A natural source of CH_4 is the anaerobic decay of organic matter. Geological deposits, known as natural gas fields, also contain CH_4, which is extracted for fuel. Other sources are from landfills, fermentation of manure, and cattle.
Nitrous Oxide (N_2O)	A colorless GHG. High concentrations can cause dizziness, euphoria, and sometimes slight hallucinations. N_2O is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. It is used in rocket engines, racecars, and as an aerosol spray propellant.
Hydrofluorocarbons (HFCs)	Chlorofluorocarbons (CFCs) are gases formed synthetically by replacing all hydrogen atoms in CH_4 or ethane (C_2H_6) with chlorine and/or fluorine atoms. CFCs are non-toxic, non-flammable, insoluble, and chemically unreactive in the troposphere (the level of air at Earth's surface). CFCs were first synthesized in 1928 for use as refrigerants, aerosol propellants, and cleaning solvents. Because they destroy stratospheric ozone, the production of CFCs was stopped as required by the Montreal Protocol in 1987. HFCs are synthetic man-made chemicals that are used as a substitute for CFCs as refrigerants. HFCs deplete stratospheric ozone, but to a much lesser extent than CFCs.
Perfluorocarbons (PFCs)	PFCs have stable molecular structures and do not break down through the chemical processes in the lower atmosphere. High-energy ultraviolet rays about 60

Table VIII-1
Description of Identified GHG Emissions[a]

Greenhouse Gas	General Description
	kilometers above Earth's surface are able to destroy the compounds. PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane and hexafluoroethane. The two main sources of PFCs are primary aluminum production and semi-conductor manufacturing.
Sulfur Hexafluoride (SF_6)	An inorganic, odorless, colorless, non-toxic, and non-flammable gas. SF_6 is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semi-conductor manufacturing, and as a tracer gas for leak detection.
Nitrogen Trifluoride (NF_3)	An inorganic, non-toxic, odorless, non-flammable gas. NF_3 is used in the manufacture of semi-conductors, as an oxidizer of high-energy fuels, for the preparation of tetrafluorohydrazine, as an etchant gas in the electronic industry, and as a fluorine source in high power chemical lasers.

[a] *GHG emissions identified in this table are ones identified in the Kyoto Protocol and other synthetic gases recently added to the IPCC's Fifth Assessment Report.*

Source: Association of Environmental Professionals, Alternative Approaches to Analyze Greenhouse Gas Emissions and Global Climate Change in CEQA Documents, Final, June 29, 2007; Environmental Protection Agency, Acute Exposure Guideline Levels (AEGLs) for Nitrogen Trifluoride; January 2009.

Global Warming Potential (GWP) is one type of simplified index based upon radiative properties used to estimate the potential future impacts of emissions of different gases on the climate system. The GWP is based on a number of factors, including the radiative efficiency (heat-absorbing ability) of each gas relative to that of CO_2, as well as the decay rate of each gas (the amount removed from the atmosphere over a given number of years) relative to that of CO_2. The larger the GWP, the more that a given gas warms the Earth compared to CO_2 over that time period. A summary of the atmospheric lifetime and GWP of selected gases is presented in Table VIII-2. As indicated in the table, the GWP ranges from 1 to 22,800.

Table VIII-2
Atmospheric Lifetimes and Global Warming Potential

Gas	Atmospheric Lifetime (years)	Global Warming Potential (100-year time horizon)
Carbon Dioxide (CO_2)	50–200	1
Methane (CH_4)	12 (+/-3)	25
Nitrous Oxide (N_2O)	114	298
HFC-23: Fluoroform (CHF_3)	270	14,800
HFC-134a: 1,1,1,2-Tetrafluoroethane (CH_2FCF_3)	14	1,430
HFC-152a: 1,1-Difluoroethane ($C_2H_4F_2$)	1.4	124
PFC-14: Tetrafluoromethane (CF_4)	50,000	7,390
PFC-116: Hexafluoromethane (C_2F_6)	10,000	12,200
Sulfur Hexafluoride (SF_6)	3,200	22,800
Nitrogen Trifluoride (NF_3)	740	17,200
Source: IPCC, Climate Change 2007: Working Group I: The Physical Science Basis, Direct Global Warming Potentials		

Projected Impacts of Global Warming in California. The scientific community's understanding of the fundamental processes responsible for global climate change has improved over the past decade, and its predictive capabilities are advancing. However, there remain significant scientific uncertainties in, for example, predictions of local effects of climate change, occurrence, frequency, and magnitude of extreme weather events, effects of aerosols, changes in clouds, shifts in the intensity and distribution of precipitation, and changes in oceanic circulation. Due to the complexity of the Earth's climate system and inability to accurately model it, the uncertainty surrounding climate change may never be completely eliminated. Nonetheless, the IPCC's Fifth Assessment Report, Summary for Policy Makers states that, "it is extremely likely that more than half of the observed increase in global average surface temperature from 1951 to 2010 was caused by the anthropogenic increase in greenhouse gas concentrations and other anthropogenic forces together." A report from the National Academy of Sciences concluded that 97 to 98 percent of the climate researchers most actively publishing in the field support the tenets of the IPCC in that climate change is very likely caused by human (i.e., anthropogenic) activity.

According to CARB, the potential impacts in California due to global climate change may include: loss in snowpack; sea level rise; more extreme heat days per year; more high ozone days; more large forest fires; more drought years; increased erosion of California's coastlines and sea water intrusion into the Sacramento and San Joaquin Deltas and associated levee systems; and increased pest infestation. Below is a summary of some of the potential effects that could be experienced in California as a result of global warming and climate change.

Air Quality. Higher temperatures, conducive to air pollution formation, could worsen air quality in California. Climate change may increase the concentration of ground-level ozone, but the magnitude of the effect and, therefore, its indirect effects, are uncertain. If higher temperatures are accompanied by drier conditions, the potential for large wildfires could increase, which, in turn, would exacerbate air quality. Additionally, severe heat accompanied by drier conditions and poor air quality could increase the number of heat-related deaths, illnesses, and asthma attacks throughout the state. However, if higher temperatures are accompanied by wetter, rather than drier conditions, the rains would temporarily clear the air of particulate pollution and reduce the incidence of large wildfires, thus ameliorating the pollution associated with wildfires.

In 2009, the California Natural Resources Agency (CNRA) published the California Climate Adaptation Strategy as a response to the Governor's Executive Order S-13-2008. The CNRA report lists specific recommendations for state and local agencies to best adapt to the anticipated risks posed by a changing climate. In accordance with the California Climate Adaptation Strategy, the California Energy Commission (CEC) was directed to develop a website on climate change scenarios and impacts that would be beneficial for local decision makers. The website, known as Cal-Adapt, became operational in 2011. The information provided on the Cal-Adapt website represents a projection of potential future climate scenarios. The data are comprised of the average values (i.e., temperature, sea-level rise, snowpack) from a variety of scenarios and models and are meant to illustrate how the climate may change based on a variety of different potential social and economic factors. According to the Cal-Adapt website, the portion of the City in which the Project Site is located could result in an average increase in temperature of approximately 5.4 to 8.0°F by 2070–2099, compared to the baseline 1961–1990 period.

Water Supply. Uncertainty remains with respect to the overall impact of global climate change on future water supplies in California. Studies have found that, "[c]onsiderable uncertainty about precise impacts of climate change on California hydrology and water resources will remain until we have more precise and consistent information about how precipitation patterns, timing, and intensity will change." For example, some studies identify little change in total annual precipitation in projections for California while others show significantly more precipitation. Warmer, wetter winters would increase the amount of runoff available for groundwater recharge; however, this additional runoff would occur at a time when some basins are either being recharged at their maximum capacity or are already full. Conversely, reductions in spring runoff and higher evapotranspiration because of higher temperatures could reduce the amount of water available for recharge.

The California Department of Water Resources report on climate change and effects on the State Water Project (SWP), the Central Valley Project, and the Sacramento-San Joaquin Delta, concludes that "climate change will likely have a significant effect on California's future water resources…[and] future water demand." It also reports that "much uncertainty about future water demand [remains], especially [for] those aspects of future demand that will be directly affected by climate change and warming. While climate

change is expected to continue through at least the end of this century, the magnitude and, in some cases, the nature of future changes is uncertain." It also reports that the relationship between climate change and its potential effect on water demand is not well understood, but "[i]t is unlikely that this level of uncertainty will diminish significantly in the foreseeable future." Still, changes in water supply are expected to occur, and many regional studies have shown that large changes in the reliability of water yields from reservoirs could result from only small changes in inflows. In its Fifth Assessment Report, the IPCC states "Changes in the global water cycle in response to the warming over the 21st century will not be uniform. The contrast in precipitation between wet and dry regions and between wet and dry seasons will increase, although there may be regional exceptions."

Hydrology and Sea Level Rise. As discussed above, climate change could potentially affect the amount of snowfall, rainfall and snowpack; the intensity and frequency of storms; flood hydrographs (flash floods, rain or snow events, coincidental high tide, and high runoff events); sea-level rise and coastal flooding; coastal erosion; and the potential for saltwater intrusion. Sea level rise can be a product of global warming through two main processes: expansion of seawater as the oceans warm and melting of ice over land. A rise in sea levels could result in coastal flooding and erosion and could jeopardize California's water supply. Increased storm intensity and frequency could affect the ability of flood-control facilities, including levees, to handle storm events.

Agriculture. California has a $30 billion agricultural industry that produces half the country's fruits and vegetables. Higher CO_2 levels can stimulate plant production and increase plant water-use efficiency. However, if temperatures rise and drier conditions prevail, water demand could increase; crop yield could be threatened by a less reliable water supply; and greater ozone pollution could render plants more susceptible to pest and disease outbreaks. In addition, temperature increases could change the time of year certain crops, such as wine grapes, bloom or ripen and thus, affect their quality.

Ecosystems and Wildlife. Increases in global temperatures and the potential resulting changes in weather patterns could have ecological effects on a global and local scale. Increasing concentrations of GHGs are likely to accelerate the rate of climate change. Scientists expect that the average global surface temperature could rise by 2-11.5°F (1.1-6.4°C) by 2100, with significant regional variation. Soil moisture is likely to decline in many regions, and intense rainstorms are likely to become more frequent. Sea level could rise as much as 2 feet along most of the United States coastline. Rising temperatures could have four major impacts on plants and animals: (1) timing of ecological events; (2) geographic range; (3) species' composition within communities; and (4) ecosystem processes such as carbon cycling and storage.

REGULATORY FRAMEWORK

In response to growing scientific and political concern with global climate change, federal and state entities have adopted a series of laws to reduce emissions of GHG emissions to the atmosphere.

Federal Clean Air Act. The U.S. Supreme Court ruled in Massachusetts v. Environmental Protection Agency, 127 S.Ct. 1438 (2007), that CO_2 and other GHG emissions are pollutants under the federal CAA, which the USEPA must regulate if it determines they pose an endangerment to public health or welfare. The U.S. Supreme Court did not mandate that the USEPA enact regulations to reduce GHG emissions. Instead, the Court found that the USEPA could avoid taking action if it found that GHG emissions do not contribute to climate change or if it offered a "reasonable explanation" for not determining that GHG emissions contribute to climate change.

On April 17, 2009, the USEPA issued a proposed finding that GHG emissions contribute to air pollution that may endanger public health or welfare. On April 24, 2009, the proposed rule was published in the Federal Register under Docket ID No. EPA-HQ-OAR-2009-0171. The USEPA stated that high atmospheric levels of GHG emissions "are the unambiguous result of human emissions and are very likely the cause of the observed increase in average temperatures and other climatic changes." The USEPA further found that "atmospheric concentrations of greenhouse gases endanger public health and welfare within the meaning of Section 202 of the Clean Air Act." The findings were signed by the USEPA Administrator on December 7, 2009. The final findings were published in the Federal Register on December 15, 2009. The final rule was effective on January 14, 2010. While these findings alone do not impose any requirements on industry or other entities, this action is a prerequisite to regulatory actions by the USEPA, including, but not limited to, GHG emissions standards for light-duty vehicles.

On April 4, 2012, the USEPA published a proposed rule to establish, for the first time, a new source performance standard for GHG emissions. Under the proposed rule, new fossil fuel–fired electric generating units larger than 25 megawatts (MW) are required to limit emissions to 1,000 pounds of CO_2 per MW-hour (CO_2/MWh) on an average annual basis, subject to certain exceptions. Subsequently, on April 23, 2018, the USEPA issued a policy stating that CO_2 emissions from biomass-fired and other biogenic sources would be considered carbon neutral when used for energy production at stationary sources.

On April 17, 2012, the USEPA issued emission rules for oil production and natural gas production and processing operations, which are required by the CAA under Title 40 of the Code of Federal Regulations, Parts 60 and 63. The final rules include the first federal air standards for natural gas wells that are hydraulically fractured, along with requirements for several other sources of pollution in the oil and gas industry that currently are not regulated at the federal level.

Corporate Average Fuel Economy (CAFE) Standards. In response to the Massachusetts v. Environmental Protection Agency ruling, the George W. Bush Administration issued Executive Order 13432 in 2007, directing the USEPA, the United States Department of Transportation (USDOT), and the United States Department of Energy (USDOE) to establish regulations that reduce GHG emissions from motor vehicles, non-road vehicles, and non-road engines by 2008. In 2009, the National Highway Traffic Safety Administration (NHTSA) issued a final rule regulating fuel efficiency for and GHG emissions from cars and light-duty trucks for model year 2011; in 2010, the USEPA and the NHTSA issued a final rule regulating cars and light-duty trucks for model years 2012–2016.

In 2010, President Obama issued a memorandum directing the USEPA, USDOT, USDOE, and NHTSA to establish additional standards regarding fuel efficiency and GHG emissions reduction, clean fuels, and advanced vehicle infrastructure. In response to this directive, the USEPA and NHTSA proposed stringent, coordinated federal GHG emissions and fuel economy standards for model years 2017–2025 light-duty vehicles. The proposed standards are projected to achieve 163 grams/mile of CO_2 in model year 2025, on an average industry fleet-wide basis, which is equivalent to 54.5 miles per gallon (mpg) if the standards were achieved solely through fuel efficiency. The final rule was adopted in 2012 for model years 2017–2021. In March 2020, NHTSA and USEPA adopted new less stringent standards covering model years 2021 through 2026.

In addition to the regulations applicable to cars and light-duty trucks described above, in 2011 the USEPA and the NHTSA announced fuel economy and GHG standards for medium- and heavy-duty trucks for model years 2014–2018. The standards for CO_2 emissions and fuel consumption are tailored to three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. According to the USEPA, this regulatory program would reduce GHG emissions and fuel consumption for the affected vehicles by 6 to 23 percent over the 2010 baselines.

Building on the success of the first phase of standards, in August 2016, the USEPA and the NHTSA finalized Phase 2 standards for medium and heavy-duty vehicles through model year 2027 that will improve fuel efficiency and cut carbon pollution. The Phase 2 standards were to lower CO_2 emissions by approximately 1.1 billion metric tons and save vehicle owners fuel costs of about $170 billion. On August 10, 2021, NHTA proposed new CAFE standards for 2024-2026 that would increase the stringency of standards by 8 percent per year rather than the previous 1.5 percent.

On September 19, 2019, the U.S. Department of Transportation's National Highway Traffic Safety Administration (NHTSA) and USEPA issued a final action entitled the "One National Program Rules" to enable the federal government to provide nationwide uniform fuel economy and GHG emissions standards for automobile and light duty trucks. This action finalizes the Safe Affordable Fuel Efficient (SAFE) Vehicles Rule and clarifies that federal law preempts state and local tailpipe GHG emissions standards as well as zero-emissions vehicle (ZEV) mandates. The SAFE Vehicle Rule also withdraws the CAA

waiver granted to the State of California that allowed the state to enforce its own Low Emission Vehicle program. On March 31, 2020, Part II of the SAFE Vehicles was issued and sets carbon dioxide emissions and CAFE standards for passenger vehicles and light duty trucks, covering model years 2021-2026. On April 22, 2021, NHTA proposed to repeal the SAFE I Rule, which was finalized in 2019.

Energy Independence and Security Act. The Energy Independence and Security Act of 2007 (EISA) facilitates the reduction of national GHG emissions by requiring the following:

- Increasing the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard (RFS) that requires fuel producers to use at least 36 billion gallons of biofuel in 2022;

- Prescribing or revising standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances;

- Requiring approximately 25 percent greater efficiency for light bulbs by phasing out incandescent light bulbs between 2012 and 2014; requiring approximately 200 percent greater efficiency for light bulbs, or similar energy savings, by 2020; and

- While superseded by the USEPA and the NHTSA actions described above, (i) establishing miles per gallon targets for cars and light trucks, and (ii) directing the NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for trucks.

Additional provisions of the EISA address energy savings in government and public institutions, promote research for alternative energy, additional research in carbon capture, international energy programs, and the creation of "green jobs."

California Executive Order S-3-05 and Executive Order B-30-15. Executive Order S-3-05, issued by Governor Schwarzenegger in June 2005, established GHG emissions targets for the state, as well as a process to ensure the targets are met. The order directed the Secretary of the California Environmental Protection Agency (CalEPA) to report every two years on the state's progress toward meeting the Governor's GHG emission reduction targets. The statewide GHG emissions reduction targets are as follows:

- By 2010, reduce to 2000 emission levels;

- By 2020, reduce to 1990 emission levels;

- By 2030, reduce to 40 percent below 1990 levels; and

- By 2050, reduce to 80 percent below 1990 levels.

Executive Order B-30-15, issued by Governor Brown in April 2015, established an additional statewide policy goal to reduce GHG emissions 40 percent below their 1990 levels by 2030. Reducing GHG emissions by 40 percent below 1990 levels in 2030 and by 80 percent below 1990 levels by 2050 (consistent with Executive Order S-3-05) aligns with scientifically established levels needed in the U.S. to limit global warming below 2 degrees Celsius.

The State Legislature adopted equivalent 2020 and 2030 statewide targets in the California Global Warming Solutions Act of 2006 (also known as Assembly Bill [AB] 32) and Senate Bill 32, respectively, both of which are discussed below. However, the Legislature has not yet adopted a target for the 2050 horizon year.

As a result of Executive Order S-3-05, the California Climate Action Team (CAT), led by the Secretary of CalEPA, was formed. The CAT is made up of representatives from a number of state agencies and was formed to implement global warming emission reduction programs and to report on the progress made toward meeting statewide targets established under the Executive Order. The CAT reported several recommendations and strategies for reducing GHG emissions and reaching the targets established in the Executive Order. The CAT stated that smart land use is an umbrella term for strategies that integrate transportation and land-use decisions. Such strategies generally encourage jobs/housing proximity, promote transit-oriented development (TOD), and encourage high-density residential/commercial development along transit corridors. These strategies develop more efficient land-use patterns within each jurisdiction or region to match population increases, workforce, and socioeconomic needs for the full spectrum of the population. “Intelligent transportation systems” is the application of advanced technology systems and management strategies to improve operational efficiency of transportation systems and the movement of people, goods, and service.

California Assembly Bill 32 (California Global Warming Solutions Act of 2006) and Senate Bill 32. The California Global Warming Solutions Act of 2006 (also known as AB 32) commits the state to achieving the following:

- By 2010, reduce to 2000 GHG emission levels, and
- By 2020, reduce to 1990 levels

To achieve these goals, which are consistent with the California CAT GHG emissions reduction targets for 2010 and 2020, AB 32 mandates that CARB establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce statewide GHG emissions from stationary sources consistent with the CAT strategies, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved. In order to achieve the reduction targets, AB 32 requires CARB to adopt rules and regulations in an open public process that achieve the maximum technologically feasible and cost-effective GHG emissions reductions.

Senate Bill (SB) 32, signed September 8, 2016, updates AB 32 (Global Warming Solutions Act) to include an emissions reductions goal for 2030. Specifically, SB 32 requires the state board to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. The new plan, outlined in SB 32, involves increasing renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries.

Climate Change Scoping Plan. In 2008, CARB approved the original Climate Change Scoping Plan as required by AB 32. Subsequently, CARB approved updates to the Climate Change Scoping Plan in 2014 (First Update) and 2017 (2017 Update), with the 2017 Update considering SB 32 (adopted in 2016) in addition to AB 32.

The original Climate Change Scoping Plan proposed a "comprehensive set of actions designed to reduce overall carbon GHG emissions in California, improve our environment, reduce our dependence on oil, diversify our energy sources, save energy, create new jobs, and enhance public health. The original Climate Change Scoping Plan identified a range of GHG reduction actions that included direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms, such as a cap-and-trade system, and an AB 32 implementation fee to fund the program.

The original Climate Change Scoping Plan called for a "coordinated set of solutions" to address all major categories of GHG emissions. Transportation emissions were addressed through a combination of higher standards for vehicle fuel economy, implementation of the Low Carbon Fuel Standard (LCFS), and greater consideration to reducing trip length and generation through land use planning and transit-oriented development. Buildings, land use, and industrial operations were encouraged and, sometimes, required to use energy more efficiently. Utility energy providers were required change to include more renewable energy sources through implementation of the Renewables Portfolio Standard (RPS). Additionally, the original Climate Change Scoping Plan emphasized opportunities for households and businesses to save energy and money through increasing energy efficiency. It indicated that substantial savings of electricity and natural gas would be accomplished through "improving energy efficiency by 25 percent."

The original Climate Change Scoping Plan identified a number of specific issues relevant to the Project, including the following:

- The potential of using the green building framework as a mechanism, which could enable GHG emissions reductions in other sectors (i.e., electricity, natural gas), noting the following:

  A Green Building strategy will produce greenhouse gas savings through buildings that exceed minimum energy efficiency standards, decrease

consumption of potable water, reduce solid waste during construction and operation, and incorporate sustainable materials. Combined, these measures can also contribute to healthy indoor air quality, protect human health, and minimize impacts to the environment.

- The importance of supporting the Department of Water Resources' work to implement the Governor's objective to reduce per capita water use by 20 percent by 2020. Specific measures to achieve this goal include water use efficiency, water recycling, and reuse of urban runoff. The original Climate Change Scoping Plan noted that water use requires significant amounts of energy, including approximately one-fifth of statewide electricity.

- Encouraging local governments to set quantifiable emission reduction targets for their jurisdictions and use their influence and authority to encourage reductions in emissions caused by energy use, waste and recycling, water and wastewater systems, transportation, and community design.

Forecasting the amount of emissions that would occur in 2020 if no actions are taken was necessary to assess the scope of the reductions California has to make to return to the 1990 emissions level by 2020 as required by AB 32. CARB originally defined the "business-as-usual" or BAU scenario as emissions in the absence of any GHG emission reduction measures discussed in the original Climate Change Scoping Plan. For example, in further explaining CARB's BAU methodology, CARB assumed that all new electricity generation would be supplied by natural gas plants, no further regulatory action would impact vehicle fuel efficiency, and building energy efficiency codes would be held at 2005 standards. In the original Climate Change Scoping Plan, CARB determined that achieving the 1990 emissions level in 2020 would require a reduction in GHG emissions of approximately 28.5 percent from the otherwise projected 2020 emissions level (i.e., those emissions that would occur in 2020, absent GHG-emissions-reducing laws and regulations).

Subsequent to adoption of the original Climate Change Scoping Plan, a lawsuit was filed challenging CARB's approval of the Climate Change Scoping Plan Functional Equivalent Document (FED to the Climate Change Scoping Plan). On May 20, 2011 (Case No. CPF-09-509562), the Court found that the environmental analysis of the alternatives in the FED to the Climate Change Scoping Plan was not sufficient under CEQA. CARB staff prepared a revised and expanded environmental analysis of the alternatives, and the Supplemental FED to the Climate Change Scoping Plan was approved on August 24, 2011 (Supplemental FED). The Supplemental FED indicated that there is the potential for adverse environmental impacts associated with implementation of the various GHG emission reduction measures recommended in the Climate Change Scoping Plan.

As part of the Supplemental FED, CARB updated the projected 2020 BAU emissions inventory based on then current economic forecasts (i.e., as influenced by the economic downturn) and emission reduction measures already in place, replacing its prior 2020

BAU emissions inventory. CARB staff derived the updated emissions estimates by projecting emissions growth, by sector, from the state's average emissions from 2006 through 2008. Specific emission reduction measures included were the million-solar-roofs program, the AB 1493 (Pavley I) motor vehicle GHG emission standards, and the LCFS. In addition, CARB also factored into the 2020 BAU inventory emissions reductions associated with a 33-percent RPS for electricity generation. Based on the new economic data, CARB determined that achieving the 1990 emissions level by 2020 would require a reduction in GHG emissions of 21.7 percent (down from 28.5 percent) from BAU conditions. When the 2020 emissions level projection also was updated to account for newly implemented regulatory measures discussed above, CARB determined that achieving the 1990 emissions level in 2020 would require a reduction in GHG emissions of 16 percent (down from 28.5 percent) from the BAU conditions.

In 2014, CARB adopted the First Update to the Climate Change Scoping Plan: Building on the Framework (First Update). The stated purpose of the First Update was to "highlight… California's success to date in reducing its GHG emissions and lay…the foundation for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050. The First Update found that California is on track to meet the 2020 emissions reduction mandate established by AB 32 and noted that California could reduce emissions further by 2030 to levels squarely in line with those needed to stay on track to reduce emissions to 80 percent below 1990 levels by 2050 if the state realizes the expected benefits of existing policy goals.

In conjunction with the First Update, CARB identified "six key focus areas comprising major components of the state's economy to evaluate and describe the larger transformative actions that will be needed to meet the state's more expansive emission reduction needs by 2050. Those six areas were: (1) energy; (2) transportation (vehicles/equipment, sustainable communities, housing, fuels, and infrastructure); (3) agriculture; (4) water; (5) waste management; and (6) natural and working lands. The First Update identified key recommended actions for each sector that would facilitate achievement of the 2050 reduction target.

Based on CARB's research efforts, it has a "strong sense of the mix of technologies needed to reduce emissions through 2050." Those technologies include energy demand reduction through efficiency and activity changes; large-scale electrification of on-road vehicles, buildings and industrial machinery; decarbonizing electricity and fuel supplies; and the rapid market penetration of efficient and clean energy technologies.

The First Update discussed new residential and commercial building energy efficiency improvements, specifically identifying progress towards zero net energy buildings as an element of meeting mid-term and long-term GHG emissions reduction goals. The First Update expressed CARB's commitment to working with the California Public Utilities Commission (CPUC) and California Energy Commission (CEC) to facilitate further achievements in building energy efficiency.

In December 2017, CARB adopted California's 2017 Climate Change Scoping Plan Update: The Strategy for Achieving California's 2030 Greenhouse Gas Target (2017 Scoping Plan Update). The 2017 Scoping Plan Update builds upon the framework established by the original Climate Change Scoping Plan and the First Update while identifying new, technologically feasible, and cost-effective strategies to ensure that California meets its GHG reduction targets in a way that promotes and rewards innovation, continues to foster economic growth, and delivers improvements to the environment and public health. The 2017 Scoping Plan Update includes policies to require direct GHG emissions reductions at some of the state's largest stationary sources and mobile sources. These policies include the use of lower GHG fuels, efficiency regulations, and the Cap-and-Trade program, which constrains and reduces emissions at covered sources.

Independent studies confirm CARB's determination that the state's existing and proposed regulatory framework will put the state on a pathway to reduce its GHG emissions level to 40 percent below 1990 levels by 2030, and to 80 percent below 1990 levels by 2050 if additional appropriate reduction measures are adopted.[28] Even though these studies did not provide an exact regulatory and technological roadmap to achieve the 2030 and 2050 goals, they demonstrated that various combinations of policies could allow the statewide emissions level to remain very low through 2050, suggesting that the combination of new technologies and other regulations not analyzed in the studies could allow the state to meet the 2050 target.

Assembly Bill 197. Assembly Bill (AB) 197, signed September 8, 2016, is a bill linked to SB 32 that prioritizes efforts to cut GHG emissions in low-income or minority communities. AB 197 requires CARB to make available, and update at least annually, on its Internet Web site the emissions of greenhouse gases, criteria pollutants, and toxic air contaminants for each facility that reports to CARB and air districts. In addition, AB 197 adds two Members of the Legislature to the CARB board as ex officio, non-voting members and also creates the Joint Legislative Committee on Climate Change Policies to ascertain facts and make recommendations to the Legislature and the houses of the Legislature concerning the state's programs, policies, and investments related to climate change.

Cap-and-Trade Program. The original Climate Change Scoping Plan identified a cap-and-trade program as one of the strategies for California to reduce GHG emissions.

---

[28] *Energy and Environmental Economics (E3). "Summary of the California State Agencies' PATHWAYS Project: Long-term Greenhouse Gas Reduction Scenarios" (April 2015); Greenblatt, Jeffrey, Energy Policy, "Modeling California Impacts on Greenhouse Gas Emissions" (Vol. 78, pp. 158–172). The California Air Resources Board, California Energy Commission, California Public Utilities Commission, and the California Independent System Operator engaged E3 to evaluate the feasibility and cost of a range of potential 2030 targets along the way to the state's goal of reducing GHG emissions to 80 percent below 1990 levels by 2050. With input from the agencies, E3 developed scenarios that explore the potential pace at which emission reductions can be achieved, as well as the mix of technologies and practices deployed. E3 conducted the analysis using its California PATHWAYS model. Enhanced specifically for this study, the model encompasses the entire California economy with detailed representations of the buildings, industry, transportation and electricity sectors. https://www.ethree.com/wp-content/uploads/2017/02/E3_Project_Overview_20150406.pdf*

Under cap-and-trade, an overall limit on GHG emissions from capped sectors is established, and facilities subject to the cap are able to trade permits to emit GHG emissions within the overall limit. According to CARB, a cap-and-trade program will help put California on the path to meet its goal of reducing GHG emissions to 1990 levels by the year 2020.

CARB adopted a California Cap-and-Trade Program pursuant to its authority under AB 32 and the State Legislature extended the Program through 2030 with the adoption of Assembly Bill 398. The Cap-and-Trade Program is designed to reduce GHG emissions from major sources, such as refineries and power plants, (deemed "covered entities"). "Covered entities" subject to the Cap-and-Trade Program are sources that emit more than 25,000 metric tons CO_2e ($MTCO_2e$) per year. Triggering of the 25,000 $MTCO_2e$ per year "inclusion threshold" is measured against a subset of emissions reported and verified under the California Regulation for the Mandatory Reporting of Greenhouse Gas Emissions (Mandatory Reporting Rule or MRR).

Under the Cap-and-Trade Program, CARB issues allowances equal to the total amount of allowable emissions over a given compliance period and distributes these to regulated entities. Covered entities are allocated free allowances in whole or in part (if eligible) and may buy allowances at auction, purchase allowances from others, or purchase offset credits. Each covered entity with a compliance obligation is required to surrender an allowance for each metric ton CO_2e of GHG they emit.

The Cap-and-Trade Program provides a firm cap, ensuring that the 2030 statewide emission limit will not be exceeded. An inherent feature of the Cap-and-Trade program is that it does not guarantee GHG emissions reductions in any discrete location or by any particular source. Rather, GHG emissions reductions are only guaranteed on a cumulative basis. As summarized by CARB in the First Update:

> *The Cap-and-Trade Regulation gives companies the flexibility to trade allowances with others or take steps to cost-effectively reduce emissions at their own facilities. Companies that emit more have to turn in more allowances or other compliance instruments. Companies that can cut their GHG emissions have to turn in fewer allowances. But as the cap declines, aggregate emissions must be reduced.*

For example, a covered entity theoretically could increase its GHG emissions every year and still comply with the Cap-and-Trade Program if there is a commensurate reduction in GHG emissions from other covered entities. Such a focus on aggregate GHG emissions is considered appropriate because climate change is a global phenomenon, and the effects of GHG emissions are considered cumulative.

The Cap-and-Trade Program works with other direct regulatory measures and provides an economic incentive to reduce emissions. If California's direct regulatory measures reduce GHG emissions more than expected, then the Cap-and-Trade Program will be responsible for relatively fewer emissions reductions. If California's direct regulatory

measures reduce GHG emissions less than expected, then the Cap-and-Trade Program will be responsible for relatively more emissions reductions. Thus, the Cap-and-Trade Program assures that California will meet its 2030 GHG emissions reduction mandate.

> *The Cap-and-Trade Program establishes an overall limit on GHG emissions from most of the California economy—the "capped sectors." Within the capped sectors, some of the reductions are being accomplished through direct regulations, such as improved building and appliance efficiency standards, the [Low Carbon Fuel Standard] LCFS, and the 33 percent [Renewables Portfolio Standard] RPS. Whatever additional reductions are needed to bring emissions within the cap is accomplished through price incentives posed by emissions allowance prices. Together, direct regulation and price incentives assure that emissions are brought down cost-effectively to the level of the overall cap. […]*
>
> *[T]he Cap-and-Trade Regulation provides assurance that California's 2020 limit will be met because the regulation sets a firm limit on 85 percent of California's GHG emissions.*

Overall, the Cap-and-Trade Program will achieve aggregate, rather than site-specific or project-level, GHG emissions reductions. Also, due to the regulatory framework adopted by CARB in AB 32, the reductions attributed to the Cap-and-Trade Program can change over time depending on the state's emissions forecasts and the effectiveness of direct regulatory measures. The Cap-and-Trade Program covered approximately 450 businesses responsible for about 85 percent of California's GHG emissions.

The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported. Accordingly, GHG emissions associated with CEQA projects' electricity usage are covered by the Cap-and-Trade Program. The Cap-and-Trade Program also covers fuel suppliers (natural gas and propane fuel providers and transportation fuel providers) to address emissions from such fuels and from combustion of other fossil fuels not directly covered at large sources in the Program's first compliance period. Furthermore, the Cap-and-Trade Program also covers the GHG emissions associated with the combustion of transportation fuels in California, whether refined in state or imported. The point of regulation for transportation fuels is when they are "supplied" (i.e., delivered into commerce). Accordingly, as with stationary source GHG emissions and GHG emissions attributable to electricity use, virtually all, if not all, of GHG emissions from CEQA projects associated with VMT are covered by the Cap-and-Trade Program.

Assembly Bill 398 (AB 398) was enacted in 2017 to extend and clarify the role of the State's Cap-and-Trade Program from January 1, 2021, through December 31, 2030. As part of AB 398, refinements were made to the Cap-and-Trade program to establish updated protocols and allocation of proceeds to reduce GHG emissions.

California Renewables Portfolio Standard. The California RPS program (2002, SB 1078) required that 20 percent of the available energy supplies are from renewable energy sources by 2017. In 2006, SB 107 accelerated the 20 percent mandate to 2010. These mandates apply directly to investor-owned utilities. On April 12, 2011, California Governor Jerry Brown signed into law SB 2X, which modified California's RPS program to require that both public and investor-owned utilities in California receive at least 33 percent of their electricity from renewable sources by the year 2020. California SB 2X also requires regulated sellers of electricity to meet an interim milestone of procuring 25 percent of their energy supply from certified renewable resources by 2016. These levels of reduction are consistent with SCE's commitment to increase its renewables portfolio over time.

Senate Bill 350. Senate Bill (SB) 350, signed October 7, 2015, is the Clean Energy and Pollution Reduction Act of 2015. SB 350 is the implementation of some of the goals of Executive Order B-30-15. The objectives of SB 350 are: (1) to increase the procurement of electricity from renewable sources from 33 percent to 50 percent by December 31, 2030; and (2) to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.

Senate Bill 1368. Senate Bill (SB) 1368, signed September 29, 2006, is a companion bill to AB 32 that requires the CPUC and the CEC to establish GHG emission performance standards for the generation of electricity. These standards also generally apply to power that is generated outside of California and imported into the state. SB 1368 provides a mechanism for reducing the emissions of electricity providers, thereby assisting CARB to meet its mandate under AB32. On January 25, 2007, the CPUC adopted an interim GHG Emissions Performance Standard, which is a facility-based emissions standard requiring that all new long-term commitments for baseload generation to serve California consumers be with power plants that have GHG emissions no greater than a combined cycle gas turbine plant. That level is established at 1,100 pounds of CO_2 per MWh. Furthermore, on May 23, 2007, the CEC adopted regulations that establish and implement an identical Emissions Performance Standard of 1,100 pounds of CO2 per MWh (see CEC Order No. 07-523-7).

Assembly Bill 1493 (Pavley I). Assembly Bill (AB) 1493, passed in 2002, requires the development and adoption of regulations to achieve "the maximum feasible reduction of greenhouse gases" emitted by noncommercial passenger vehicles, light-duty trucks, and other vehicles used primarily for personal transportation in the state. CARB originally approved regulations to reduce GHG emissions from passenger vehicles in September 2004, with the regulations to take effect in 2009. On September 24, 2009, CARB adopted amendments to these "Pavley" regulations that reduce GHG emissions in new passenger vehicles from 2009 through 2016. Although setting emission standards on automobiles is solely the responsibility of the USEPA, the federal CAA allows California to set state-specific emission standards on automobiles if the state first obtains a waiver from the USEPA. The USEPA granted California that waiver on July 1, 2009. A comparison between the AB 1493 standards and the Federal CAFE standards was completed by

CARB and the analysis determined that California emission standards are 16 percent more stringent through the 2016 model year and 18 percent more stringent for 2020 model year. California is also committed to further strengthening these standards beginning with 2020 model year vehicles to obtain a 45-percent GHG reduction in comparison to the 2009 model year.

Executive Order S-1-07 (California Low Carbon Fuel Standard). Executive Order S-1-07, the LCFS (issued on January 18, 2007), requires a reduction of at least 10 percent in the carbon intensity of California's transportation fuels by 2020. Regulatory proceedings and implementation of the LCFS were directed to CARB. The LCFS has been identified by CARB as a discrete early action item in the adopted Climate Change Scoping Plan. The LCFS program was re-adopted in 2015 and will continue to complement other AB 32 measures, transform and diversify the fuel pool, and is a key part of the State's petroleum reduction goals for 2030.

Advanced Clean Cars Regulations. In 2012, CARB approved the Advanced Clean Cars (ACC) program, a new emissions-control program for model years 2015–2025. The components of the Advance Clean Car program include the Low-Emission Vehicle (LEV) regulations that reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles, and the Zero-Emission Vehicle (ZEV) regulation, which requires manufacturers to produce an increasing number of pure ZEVs (meaning battery electric and fuel cell electric vehicles), with provisions to also produce plug-in hybrid electric vehicles (PHEV) in the 2018 through 2025 model years. In March 2017, CARB voted unanimously to continue with the vehicle greenhouse gas emission standards and the ZEV program for cars and light trucks sold in California through 2025.

Senate Bill 375. Acknowledging the relationship between land use planning and transportation sector GHG emissions, Senate Bill (SB) 375 was passed by the State Assembly on August 25, 2008 and signed by the Governor on September 30, 2008. This legislation links regional planning for housing and transportation with the GHG reduction goals outlined in AB 32. Reductions in GHG emissions would be achieved by, for example, locating employment opportunities close to transit. Under SB 375, each Metropolitan Planning Organization (MPO) would be required to adopt a Sustainable Community Strategy (SCS) to encourage compact development that reduce passenger VMT and trips so that the region will meet a target, created by CARB, for reducing GHG emissions. If the SCS is unable to achieve the regional GHG emissions reduction targets, then the MPO is required to prepare an alternative planning strategy that shows how the GHG emissions reduction target could be achieved through alternative development patterns, infrastructure, and/or transportation measures.

California Appliance Efficiency Regulations (Title 20, Sections 1601 through 1608). The 2014 Appliance Efficiency Regulations, adopted by the CEC, include standards for new appliances (e.g., refrigerators) and lighting, if they are sold or offered for sale in California. These standards include minimum levels of operating efficiency, and other cost-effective measures, to promote the use of energy- and water-efficient appliances.

California Building Energy Efficiency Standards (Title 24, Part 6). California's Energy Efficiency Standards for Residential and Nonresidential Buildings, located at Title 24, Part 6 of the California Code of Regulations and commonly referred to as "Title 24," were established in 1978 in response to a legislative mandate to reduce California's energy consumption. Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. The CEC adopted the 2016 Title 24 standards, which became effective on January 1, 2017. The 2019 standards continue to improve upon the 2013 Title 24 standards for new construction of, and additions and alterations to, residential and non-residential buildings and became effective January 1, 2020. Compliance with Title 24 is enforced through the building permit process.

California Green Building Standards (CALGreen Code). The California Green Building Standards Code (California Code of Regulations, Title 24, Part 11), commonly referred to as the CALGreen Code, went into effect on January 1, 2017. Most mandatory measure changes in the 2016 CALGreen Code from the previous 2013 CALGreen Code were related to the definitions and to the clarification or addition of referenced manuals, handbooks, and standards. For example, several definitions related to energy that were added or revised affect electric vehicles chargers and charging and hot water recirculation systems. For new multi-family dwelling units, the residential mandatory measures were revised to provide additional electric vehicle charging space requirements, including quantity, location, size, single EV space, multiple EV spaces, and identification. For nonresidential mandatory measures, the table (Table 5.106.5.3.3) identifying the number of required EV charging spaces has been revised in its entirety. Compliance with Title 24 is enforced through the building permit process. The 2019 CalGreen code updates were published July 1, 2019, with an effective date of January 1, 2020.

Senate Bill 97. On June 19, 2008, the Office of Planning and Research (OPR) released a technical advisory on addressing climate change. This guidance document outlines suggested components to CEQA disclosure, including quantification of GHG emissions from a project's construction and operation; determination of significance of the project's impact to climate change; and if the project is found to be significant, the identification of suitable alternatives and mitigation measures.

Senate Bill (SB) 97, passed in August 2007, is designed to work in conjunction with CEQA and AB 32. SB 97 requires OPR to prepare and develop guidelines for the mitigation of GHG emissions or the effects thereof, including, but not limited to, the effects associated with transportation and energy consumption. The *Draft Guidelines Amendments for Greenhouse Gas Emissions* (Guidelines Amendments) were adopted on December 30, 2009 and address the specific obligations of public agencies when analyzing GHG emissions under CEQA to determine a project's effects on the environment.

However, neither a threshold of significance nor any specific mitigation measures are included or provided in the Guidelines Amendments. The Guidelines Amendments

require a lead agency to make a good-faith effort, based on the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of GHG emissions resulting from a project. The Guidelines Amendments give discretion to the lead agency whether to: (1) use a model or methodology to quantify GHG emissions resulting from a project, and which model or methodology to use; or (2) rely on a qualitative analysis or performance- based standards. Furthermore, the Guidelines Amendments identify the following three factors that should be considered in the evaluation of the significance of GHG emissions:

1. The extent to which a project may increase or reduce GHG emissions as compared to the existing environmental setting;

2. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and

3. The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

The administrative record for the Guidelines Amendments also clarifies "that the effects of greenhouse gas emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis."

The California Natural Resources Agency is required to periodically update the Guidelines Amendments to incorporate new information or criteria established by CARB pursuant to AB 32. SB 97 applies to any environmental impact report (EIR), negative declaration, mitigated negative declaration, or other document required by CEQA, which has not been finalized.

Senate Bill 743. This 2013 legislation updates the way transportation impacts are measured in California, focusing on VMT rather than level of service as the main measure of transportation impacts. It calls on decision-makers throughout the State to focus on reducing overall VMT and the GHG emissions from such vehicle activity. Traffic studies in the City began formally analyzing projects in this fashion effective July 1, 2020.

South Coast Air Quality Management District. The SCAQMD adopted a "Policy on Global Warming and Stratospheric Ozone Depletion" on April 6, 1990. The policy commits the SCAQMD to consider global impacts in rulemaking and in drafting revisions to the Air Quality Management Plan. In March 1992, the SCAQMD Governing Board reaffirmed this policy and adopted amendments to the policy to include the following directives:

- Phase out the use and corresponding emissions of chlorofluorocarbons, methyl chloroform (1,1,1-trichloroethane or TCA), carbon tetrachloride, and halons by December 1995;

- Phase out the large quantity use and corresponding emissions of hydrochlorofluorocarbons by the year 2000;
- Develop recycling regulations for hydrochlorofluorocarbons (e.g., SCAQMD Rules 1411 and 1415);
- Develop an emissions inventory and control strategy for methyl bromide; and
- Support the adoption of a California GHG emission reduction goal.

Southern California Association of Governments. To implement SB 375 and reduce GHG emissions by correlating land use and transportation planning, SCAG adopted the 2020-2045 RTP/SCS, which calls for $639 billion in transportation investments and reducing VMT by 19 percent per capita from 2005 to 2035. The 2020-2045 RTP/SCS accommodates 21.3 percent growth in population from 2020 (3,933,800) to 2045 (4,771,300) and a 15.6 percent growth in jobs from 2020 (1,848,300) to 2045 (2,135,900). The 2020-2045 RTP/SCS calls for a number of land use-based strategies to accommodate growth, minimize criteria pollutant emissions, and achieve climate change objectives, including the following:

- Identify regional strategic areas for infill and investment;
- Structure the plan on a three-tiered system of centers development;
- Develop “Complete Communities”;
- Develop nodes on a corridor;
- Plan for additional housing and jobs near transit;
- Plan for changing demand in types of housing;
- Continue to protect stable, existing single-family areas;
- Ensure adequate access to open space and preservation of habitat; and
- Incorporate local input and feedback on future growth.

The 2020-2045 RTP/SCS calls for a 19 percent reduction in per capita GHG emissions by 2035 from 2005 levels. This is intended to be consistent with CARB’s performance targets during this same period. The bulk of these reductions is to come from transportation investments, pricing strategies, TDM strategies, and land use programs. On October 30, 2020, CARB accepted the RTP/SCS quantification of GHG emissions on October 30, 2020 (Executive Order G-20-239, SCAG 2020 SCS ARB Acceptance of GHG Quantification Determination).

City of Paramount General Plan Health and Safety Element. The City adopted a Health and Safety Element on February 8, 2022, that discusses climate adaptation and the City's vulnerability to extreme weather, power outages, flooding, and other disasters. The Element outlines 17 policies that address climate change.

City of Paramount Climate Action Plan. The City adopted its first Climate Action Plan (CAP) in July 2021 that lays out strategies, goals, and actions for reducing municipal and community-wide GHG emissions. It is designed to define how the City can do its part to help California meet its 2030 GHG reduction targets as set forth in SB 32. This includes a 40 percent reduction (149,919 metric tons of CO_2e $MTCO_2e$]) of the City's 2010 emissions by 2030. The CAP found that 112,471 $MTCO_2e$ could be reduced from state measures, 4,116 $MTCO_2e$ from regional measures, and 45,128 $MTCO_2e$ from local measures. It found that the City still needs to reduce another 20,377 $MTCO_2e$ to reduce 2010 emissions by 40 percent. The CAP includes 17 measures spanning the range of sources both local and regional.

Pursuant to CEQA Guidelines Section 15183.5, the CAP can be the basis for determining the significance of GHG emissions as the plan meets the six criteria for such a plan. These include quantifying GHG emissions, setting a target for emissions that would be cumulatively considerable, identifying emissions from specific actions, specifying measures, developing a monitoring plan, and adopted the plan in a public process following environmental review.

City of Paramount Green Building Code. The City currently enforces the 2019 California Building, Electrical, Plumbing, and Mechanical Codes, as amended with Los Angeles County amendments codified in Title 26 and other sections of the County's municipal codes. This includes the mandatory requirements of the 2019 California Green Building Standards Code, which promote higher standards for energy efficiency and sustainability features, including drip/subsurface irrigation systems, individual metering or sub-metering for water use, leak detection systems, and electric vehicle charging capacity.

EXISTING CONDITIONS

Existing Statewide GHG Emissions. GHG emissions are the result of both natural and human-influenced activities. Regarding human-influenced activities, motor vehicle travel, consumption of fossil fuels for power generation, industrial processes, heating and cooling, landfills, agriculture, and wildfires are the primary sources of GHG emissions. Without human intervention, Earth maintains an approximate balance between the emission of GHG emissions into the atmosphere and the storage of GHG emissions in oceans and terrestrial ecosystems. Events and activities, such as the industrial revolution and the increased combustion of fossil fuels (e.g., gasoline, diesel, coal, etc.), have contributed to the rapid increase in atmospheric levels of GHG emissions over the last 150 years.

As reported by the CEC, California contributes approximately one percent of global and 8.2 percent of national GHG emissions.[29] California represents approximately 12 percent of the national population. Approximately 80 percent of GHGs in California are CO_2 produced from fossil fuel combustion. The current California GHG inventory compiles statewide anthropogenic GHG emissions and carbon sinks/storage from years 2000 through 2018.[30] It includes estimates for CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6. The GHG inventory for California for years 2010 through 2018 is presented in Table VIII-3. As shown therein, the GHG inventory for California in 2018 was 425.4 million $MTCO_2e$.

Table VIII-3
California GHG Inventory
(million metric tons CO_2e)

	2013	2014	2015	2016	2017	2018	2019
Transportation	161.2	162.6	166.2	169.8	171.2	169.6	166.1
Electric Power	91.4	88.9	84.8	68.6	62.1	63.1	58.8
Industrial	91.7	92.5	90.3	89.0	88.8	89.2	88.2
Commercial & Residential	44.2	38.2	38.8	40.6	41.3	41.4	43.8
Agriculture	33.8	34.7	33.5	33.3	32.5	32.7	31.8
High GWP	16.8	17.7	18.6	19.2	20.0	20.4	20.6
Recycling & Waste	8.4	8.4	8.5	8.6	8.7	8.7	8.9
Total	447.5	443.0	440.7	429.1	424.6	425.1	418.2

Source: California Air Resources Board (2021). California Greenhouse Gas Emission Inventory - 2021 Edition. Data available at: https://ww3.arb.ca.gov/cc/inventory/data/data.htm.

Existing Project Site Emissions. The Project Site is developed with 12,580 square feet of industrial manufacturing uses. GHG emissions associated with existing uses are shown in Table VIII-4.

29 *California Energy Commission, Tracking Progress, Greenhouse Gas Emission Reductions. https://www.energy.ca.gov/data-reports/tracking-progress. Accessed April 2020.*

30 *A carbon inventory identifies and quantifies sources and sinks of greenhouse gases. Sinks are defined as a natural or artificial reservoir that accumulates and stores some carbon-containing chemical compound for an indefinite period.*

Table VIII-4
Annual GHG Emissions Summary[a]
(metric tons of carbon dioxide equivalent [MTCO2e])

Year	$MTCO_2$[a]
Area[b]	2.1
Energy[c] (electricity and natural gas)	599.0
Mobile	86.7
Solid Waste[d]	40.5
Water/Wastewater[e]	72.6
Refrigerants	4.5
Total Emissions	**806.4**

[a] *CO_2e was calculated using CalEEMod model, version 2022.1.*
[b] *Area source emissions are from landscape equipment and other operational equipment.*
[c] *Energy source emissions are based on CalEEMod default electricity and natural gas usage rates.*
[d] *Solid waste emissions are calculated based on CalEEMod default solid waste generation rates.*
[e] *Water/Wastewater emissions are calculated based on CalEEMod default water consumption rates.*

Source: DKA Planning, 2022. Modeling results included in Appendix E.

IMPACT ANALYSIS

a) Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

b) Would the project conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHG emissions?

Less Than Significant Impact. Whether the Project would generate GHG emissions that could have a significant impact on the environment is based on whether the Project would conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHG emissions. As such, both of these Checklist Questions are addressed together.

Methodology and Thresholds of Significance

CEQA Guidelines Section 15064.4(a) assists lead agencies in determining the significance of the impacts of GHG emissions, giving lead agencies discretion to determine whether to assess impacts quantitatively or qualitatively, calling for a good-faith effort to describe and calculate emissions. The emissions inventory also demonstrates the reduction in a project's incremental contribution of GHG emissions that results from regulations and requirements adopted as implementation efforts for these

plans for the reduction or mitigation of GHG emissions. As such, it provides further justification that a project is consistent with plans adopted for the purpose of reducing and/or mitigating GHG emissions by a project and over time. The significance of a project's GHG emissions impacts is not based on the amount of GHG emissions resulting from the Project.

The City, SCAQMD, Office of Planning and Research (OPR), CARB, California Air Pollution Control Officers Association (CAPCOA), and other applicable agencies have not adopted a numerical threshold of significance for assessing impacts related to GHG emissions. As a result, the methodology for evaluating a project's impacts related to GHG emissions focuses on its consistency with statewide, regional, and local plans adopted for the purpose of reducing and/or mitigating GHG emissions.[31] This evaluation is the sole basis pursuant to CEQA for determining the significance of a project's GHG-related impacts on the environment.

The analysis also calculates the amount of GHG emissions from the Project using recommended air quality models. The primary purpose of quantifying the Project's GHG emissions is to satisfy CEQA Guidelines Section 15064.4(a). The estimated emissions inventory is also used to determine if there would be a reduction in the Project's incremental contribution of GHG emissions as a result of compliance with regulations requirements adopted to implement plans for reducing or mitigating GHG emissions. However, the significance of the Project's GHG emissions is not based on the amount of emissions from the Project.

Consistency with Applicable Plans and Policies

A consistency analysis has been provided that describes the Project's compliance with or exceedance of performance-based standards, and consistency with applicable plans and policies adopted for the purpose of reducing GHG emissions, specifically the City's 2021 CAP, which meets the six criteria in CEQA Guidelines Section 15183.5 and serves as the basis for the Project's significance evaluation. For informational purposes, this analysis also compares the Project's consistency with the applicable portions of the *Climate Change Scoping Plan*, the 2020-2045 RTP/SCS, and the City's Health and Safety Element.

OPR encourages lead agencies to make use of programmatic mitigation plans and programs from which to tier when they perform project analyses. Statewide, the *Climate Change Scoping Plan* provides measures to achieve AB 32 and SB 32 targets. On a regional level, SCAG's 2020-2045 RTP/SCS contains measures to achieve VMT reduction required by SB 375. Ultimately, the City's CAP serves as the programmatic mitigation plan from which this analysis can tier.

---

31 *CEQA Guidelines, Section 14 CCR 15064.4.*

As noted in CEQA Guidelines Section 15064.4(b)(3), consistency with such plans and policies "must reduce or mitigate the project's incremental contribution of greenhouse gas emissions." To demonstrate such incremental reductions, this section estimates reductions of Project-related GHG emissions resulting from consistency with plans. Consistent with evolving scientific knowledge, approaches to GHG emissions reductions quantification may continue to evolve in the future.

Quantification of Emissions

This analysis quantifies the Project's GHG emissions for informational purposes, taking into account the GHG emissions reduction features that would be incorporated into the Project's design. This analysis relies on CalEEMod, a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use projects. CalEEMod was developed in collaboration with the air districts of California, who provided data (e.g., emission factors, trip lengths, meteorology, source inventory) to account for local requirements and conditions. The model is considered by SCAQMD to be an accurate and comprehensive tool for quantifying air quality and GHG emissions impacts from land use projects throughout California.

This analysis quantifies the Project's emissions and compares them to a Project without Reduction Features scenario, as defined by CARB's most updated projections for AB 32 and SB 32. This comparison is included for informational purposes to disclose the relative carbon efficiency of the Project and to determine if there would be a reduction in the Project's incremental contribution of GHG emissions based on compliance with regulations and requirements adopted to implement plans for reducing GHG emissions. The Project without Reduction Features scenario does not account for energy efficiency measures that would go beyond Title 24 building standards or trip reductions from the availability of public transit. However, the Project without Reduction Features does take into account regulatory measures included in the City's CAP, CARB's *Climate Change Scoping Plan,* SCAG's 2020-2045 RTP/SCS, and the City's General Plan Health and Safety Element.

Project GHG Emissions

Construction Emissions

The Project's construction emissions were calculated using CalEEMod Version 2022.1. CalEEMod calculates emissions from off-road equipment usage and on-road vehicle travel associated with haul, delivery, and construction worker trips. GHG emissions during construction were forecasted based on the proposed construction schedule and included the mobile- source and fugitive dust emissions factors derived from CalEEMod.

The calculations of the emissions generated during Project construction activities reflect the types and quantities of construction equipment that would be used to remove existing pavement, grade, and excavate the Project Site; construct the proposed building and related improvements; and plant new landscaping within the Project Site.

In accordance with SCAQMD's guidance, GHG emissions from construction were amortized (i.e., averaged annually) over the assumed lifetime of the Project. Because emissions from construction activities occur over a relatively short-term period of time, they contribute a relatively small portion of the overall lifetime GHG emissions for the Project. In addition, GHG emissions reduction measures for construction equipment are relatively limited. Thus, SCAQMD recommends that construction emissions be amortized over an assumed 30-year project lifetime, so that GHG emissions reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies.[32] As a result, the Project's total construction GHG emissions were divided by 30 to determine an approximate annual construction emissions estimate comparable to operational emissions.

Operational Emissions

Similar to construction, CalEEMod is used to calculate potential GHG emissions generated by new land uses on the Project Site, including area sources, electricity, natural gas, mobile sources, stationary sources (i.e., emergency generators), solid waste generation and disposal, and water usage/wastewater generation.

Area source emissions include landscaping equipment that are based on the size of the land uses (e.g., square footage or dwelling unit), the GHG emission factors for fuel combustion, and the GWP values for the GHG emissions emitted.

GHG emissions associated with electricity demand are based on the size of the land uses, the electrical demand factors for the land uses, the GHG emission factors for the electricity utility provider, and the GWP values for the GHG emissions emitted. As with electricity, the emissions of GHG emissions associated with natural gas combustion are based on the size of the land uses, the natural gas combustion factors for the land uses in units of million British thermal units (MMBtu), the GHG emission factors for natural gas combustion, and the GWP values for the GHG emissions emitted.

Mobile source GHG emissions are calculated based on an estimate of the Project's annual VMT, which is derived using CalEEMod based on the trip generation provided in the Transportation Study prepared for the Project. The CalEEMod-derived VMT values account for the daily and seasonal variations in trip frequency and length associated with new residential, employee, and visitor trips to and from the Project Site and other activities that generate a vehicle trip.

---

32 *SCAQMD Governing Board Agenda Item 31, December 5, 2008.*

Stationary source GHG emissions are based on proposed stationary sources (i.e., emergency generators) that would be provided on the Project Site.

GHG emissions associated with solid waste disposal are based on the size of the Project's proposed land uses, the waste disposal rate for the land uses, the waste diversion rate, the GHG emission factors for solid waste decomposition, and the GWP values for the GHG emissions emitted.

GHG emissions related to water usage and wastewater generation are based on the size of the land uses, the water demand factors, the electrical intensity factors for water supply, treatment, and distribution, electrical intensity factors for wastewater treatment, the GHG emission factors for the electricity utility provider, and the GWP values for the GHG emissions emitted.

The analysis of Project GHG emissions at buildout uses assumptions in CARB's EMFAC2014 model and also takes into account actions and mandates expected to be in force in 2024 (e.g., Pavley I Standards, full implementation of California's 33 percent RPS by 2030 and 50 percent by 2050 and the California LCFS). In addition, because mobile source GHG emissions are directly dependent on the number of vehicle trips, a decrease in the number of project-generated trips as a result of project features (e.g., close proximity to transit) would provide a proportional reduction in mobile source GHG emissions compared to a generic project without such locational benefits. Calculation of Project GHG emissions conservatively did not include actions and mandates that are not already in place but are expected to be enforced in 2024 (e.g., Pavley II, which could further reduce GHG emissions from use of light-duty vehicles by 2.5 percent). Similarly, emissions reductions regarding Cap-and-Trade were not included in this analysis as they applied to other future reductions in non-transportation sectors. As for the Cap-and-Trade program's benefits for the transportation sector, the analysis utilizes CARB's assumptions in EMFAC2021 for any short-term reductions in GHG emissions. By not speculating on potential regulatory conditions, the analysis takes a conservative approach that likely overestimates the Project's GHG emissions at buildout, because the state is expected to implement a number of policies and programs aimed at reducing GHG emissions from the land use and transportation sectors to meet the state's long-term climate goals.

Impact Discussion

Construction Emissions

Project construction is anticipated to be completed in 2024 with occupancy the same year. A summary of GHG emissions for each year of construction is presented in Table VIII-5. As shown, construction of the Project is estimated to generate a total of 312 $MTCO_2e$. As recommended by the SCAQMD, the total GHG construction emissions were amortized over the 30-year assumed lifetime of the Project (i.e., total construction GHG emissions were divided by 30 to determine an annual construction emissions estimate that can be added to the Project's operational emissions) in order to determine the Project's annual

GHG emissions inventory. This results in annual Project construction emissions of 10 $MTCO_2e$.

Table VIII-5
Combined Construction-Related Emissions ($MTCO_2e$)

Year	$MTCO_2e$[a]
2023	219
2024	33
Total	**312**
Amortized Over 30 Years	**10**

[a] *CO_2e was calculated using CalEEMod and the results are provided in Section 2.0 of the Construction CalEEMod output file in Appendix E.*

Source: DKA Planning, 2022.

Operational Emissions

Area Source Emissions

Area source emissions were calculated using the CalEEMod emissions inventory model and include emissions from landscape maintenance equipment, use of consumer products, and other everyday sources. As shown in Table VIII-6, the Project would result in about 2 $MTCO_2e$ per year from area sources.

Electricity and Natural Gas Generation Emissions

GHG emissions are emitted as a result of activities in buildings when electricity and natural gas are used as energy sources. Combustion of any type of fuel emits CO_2 and other GHG emissions directly into the atmosphere; when this occurs in a building, it is a direct emission source associated with that building. GHG emissions are also emitted during the generation of electricity from fossil fuels. When electricity is used in a building, the electricity generation typically takes place off-site at the power plant; electricity use in a building generally causes emissions in an indirect manner.

Electricity and natural gas emissions were calculated for the Project using the CalEEMod emissions inventory model, which multiplies an estimate of the energy usage by applicable emissions factors chosen by the utility company. GHG emissions from electricity use are directly dependent on the electricity utility provider. In this case, GHG emissions intensity factors for SCE were selected in CalEEMod. The carbon intensity (pounds per megawatt an hour ([bs/MWh]) for electricity generation was calculated for the Project buildout year based on SCE projections. A straight-line interpolation was performed to estimate the SCE carbon intensity factor for the Project buildout year. SCE's

carbon intensity projections also take into account SB 350 RPS requirements for renewable energy.

Table VIII-6
Annual GHG Emissions Summary (Buildout)[a]
(metric tons of carbon dioxide equivalent [$MTCO_2e$])

Source	$MTCO_2$[a]
Area[b]	2
Energy[c] (electricity and natural gas)	599
Mobile	87
Solid Waste[d]	73
Water/Wastewater[e]	41
Refrigerants	5
Construction	10
Total Emissions	**816**

[a] *CO_2e was calculated using CalEEMod and the results are provided in Appendix E.*
[b] *Area source emissions are from landscape equipment and other operational equipment only; hearths omitted.*
[c] *Energy source emissions are based on CalEEMod default electricity and natural gas usage rates.*
[d] *Solid waste emissions are calculated based on CalEEMod default solid waste generation rates.*
[e] *Water/Wastewater emissions are calculated based on CalEEMod default water consumption rates.*

Source: DKA Planning, 2022. Refer to Appendix E.

This approach is conservative, given the 2018 chaptering of SB 100 (De Leon), which requires electricity providers to provide renewable energy for at least 60 percent of their delivered power by 2030 and 100 percent use of renewable energy and zero-carbon resources by 2045. SB 100 also increases existing renewable energy targets, called Renewables Portfolio Standard (RPS), to 44 percent by 2024 and 52 percent by 2027.

Energy use in buildings is divided into energy consumed by the built environment and energy consumed by uses that are independent of the construction of the building, such as in plug-in appliances. CalEEMod calculates energy use from systems covered by Title 24 (e.g., HVAC system, water heating system, and lighting system); energy use from lighting; and energy use from office equipment, appliances, plug-ins, and other sources not covered by Title 24 or lighting.

CalEEMod electricity and natural gas usage rates are based on the CEC-sponsored California Commercial End-Use Survey (CEUS) and the California Residential Appliance Saturation Survey (RASS) studies. The data are specific for climate zones; therefore, Zone 11 was selected for the Project Site based on the zip code tool. Since these studies are based on older buildings, adjustments have been made to account for changes to

Title 24 building codes but do not reflect the 2019 Title 24 standards, which are applicable to the Project as the Project would be built after January 1, 2020. As such, these conservative estimates of energy and natural gas use are likely to be much higher than actual demand for sources subject to Title 24 standards (e.g., space heating, cooling, water heating, ventilation, hot water).

As shown in Table VIII-6, Project GHG emissions from electricity and natural gas usage would result in a total of 599 $MTCO_2e$ per year.

Mobile Source Emissions

Mobile-source emissions were calculated using the SCAQMD-recommended CalEEMod emissions inventory model. CalEEMod calculates the emissions associated with on-road mobile sources associated with residents, employees, visitors, and delivery vehicles visiting the Project Site based on the number of daily trips generated and VMT.

Mobile source operational GHG emissions were calculated using CalEEMod and are based on the Project trip-generation estimates. To calculate daily trips, the number of hotel rooms and amount of building area for the restaurant uses were multiplied by the applicable trip-generation rates based on ITE Trip Generation, 10th Edition.

The Project represents an infill development within an urbanized area. The Project would also incorporate characteristics that would reduce trips and VMT as compared to standard ITE trip generation rates. The Project characteristics listed below are consistent with the CAPCOA guidance document, *Quantifying Greenhouse Gas Mitigation Measures*, which provides emission reduction values for transportation-related design techniques. These techniques would reduce vehicle trips and VMT associated with the Project relative to the standard ITE trip generation rates, which would result in a comparable reduction in VMT and associated GHG emissions. Techniques applicable to the Project include the following (a brief description of the Project's relevance to the measure is also provided):

- CAPCOA Measure LUT-3 – Increase Diversity of Urban and Suburban Developments (Mixed-Use): The Project would introduce new uses on the Project Site, including new self-storage uses that support residents and businesses. The increases in land use diversity on the Project Site would reduce vehicle trips and VMT by encouraging visitors to use non-automotive forms of transportation (i.e., public transit), which would result in corresponding reductions in transportation-related emissions.

- CAPCOA Measure LUT-5 – Increase Transit Accessibility: Project employees could take public transit to/from the Project Site, given the site's proximity to several Metro and Long Beach Transit bus routes.

CalEEMod calculates VMT based on the type of land use, trip purpose, and trip type percentages for each land use subtype in the project (primary, diverted, and pass-by trips.

As shown in Table VIII-6, the Project GHG emissions from mobile sources would result in a total of 87 $MTCO_2e$ per year. This estimate reflects reductions attributable to the Project's characteristics (e.g., infill project near transit that supports multi-modal transportation options), as described above.

Solid Waste Generation Emissions

Emissions related to solid waste were calculated using the CalEEMod emissions inventory model, which multiplies an estimate of the waste generated by applicable emissions factors provided in Section 2.4 of the USEPA's AP-42, Compilation of Air Pollutant Emission Factors. CalEEMod solid waste generation rates for each applicable land use were selected for this analysis. As shown in Table VIII-6, the Project scenario is expected to result in a total of 73 $MTCO_2e$ per year from solid waste that accounts for a 50-percent recycling/diversion rate.

Water Usage and Wastewater Generation Emissions

GHG emissions are related to the energy used to convey, treat, and distribute water, and treat wastewater. Thus, these emissions are generally indirect emissions from the production of electricity to power these systems. Three processes are necessary to supply potable water; these include (1) supply and conveyance of the water from the source; (2) treatment of the water to potable standards; and (3) distribution of the water to individual users. After use, energy is used as the wastewater is treated and reused as reclaimed water.

Emissions related to water usage and wastewater generation were calculated for the Project using the CalEEMod emissions inventory model, which multiplies an estimate of the water usage by the applicable energy intensity factor to determine the embodied energy necessary to supply potable water. GHG emissions are then calculated based on the amount of electricity consumed multiplied by the GHG emissions intensity factors for the utility provider. In this case, embodied energy for Southern California supplied water and GHG emissions intensity factors for SCE were selected in CalEEMod.

As shown in Table VIII-6, Project GHG emissions from water/wastewater usage would result in a total of 41 $MTCO_2e$ per year, which reflects a 20-percent reduction in water/wastewater emissions consistent with building code requirements as compared to the Project without sustainability features related to water conservation.

Refrigerants

Emissions related to cooling structures and refrigeration needs were calculated using the CalEEMod emissions inventory model. As shown in Table VIII-6, the Project scenario is expected to result in a total of 5 $MTCO_2e$ per year from use of refrigerants that used HFCs and have high GWP values.

Combined Construction and Operational Emissions

As shown in Table VIII-6, when taking into consideration implementation of project design features, including the requirements set forth in the City's Green Building Code and the full implementation of current state mandates, the GHG emissions for the Project would equal 10 $MTCO_2e$ annually (as amortized over 30 years) during construction.

Estimated Reduction of Project Related GHG Emissions Resulting from Consistency with Plans

As noted earlier, the approach used in this analysis to demonstrate the Project's consistency with GHG emissions reductions plans includes assessing how the Project would reduce its incremental contribution through a Project-Without-Reduction-Features comparison. This analysis includes potential emissions under a Project-Without-Reduction-Features scenario and from the Project at build-out based on actions and mandates in force in 2024.

As shown in Table VIII-7, the emissions for the Project and its associated CARB 2024 Project-Without-Reduction-Features scenario are estimated to be 816 and 1,287 $MTCO_2e$ per year, respectively, which shows the Project would reduce emissions by 38 percent from CARB's 2024 Project-Without-Reduction-Features scenario.

For informational purposes, the analysis in this section uses the 2017 Scoping Plan's statewide goals as one approach to evaluate the Project's incremental contribution to climate change. The methodology is to compare the Project's emissions as proposed to the Project's emissions as if the Project were built using a Project-Without-Reduction-Features approach in terms of design, methodology, and technology. This means the Project's emissions were calculated as if the Project was constructed with project design features to reduce GHG emissions that are not required by state or local code and with several regulatory measures adopted in furtherance of AB 32.

While the AB 32 Scoping Plan's cumulative statewide objectives were not intended to serve as the basis for project-level assessments, this analysis finds that its Project-Without-Reduction-Features comparison based on the Scoping Plan is appropriate, because the Project would contribute to statewide GHG emissions reduction goals. Specifically, the Project's infill nature provides opportunities to reduce transportation-related emissions. First, it would capture vehicle travel on-site that would have normally been destined for off-site locations. Second, it could reduce vehicle trip length, because travel to and from the Project Site would likely occur from residents in the City and/or in close proximity to the site. Finally, the Project would attract existing trips on the street network that would divert to the proposed uses.

Table VIII-7
Estimated Reduction of Project-Related GHG Emissions
Resulting from Consistency with Plans

Scenario and Source	NAT Scenario*	As Proposed Scenario	Reduction from NAT Scenario	Change from NAT Scenario
Area Sources	2	2	-	0%
Energy Sources	1,033	599	-434	-42%
Mobile Sources	124	87	-37	-30%
Waste Sources	73	73	-	0%
Water Sources	41	41	-	0%
Refrigerants	5	5	-	0%
Construction	10	10	-	0%
Total Emissions	1,287	816	-471	38%

Daily construction emissions amortized over 30-year period pursuant to SCAQMD guidance. Annual construction emissions derived by taking total emissions over duration of activities and dividing by construction period.

** NAT scenario does not assume 30% reduction in in mobile source emissions from Pavley emission standards (19.8%), low carbon fuel standards (7.2%), vehicle efficiency measures 2.8%); does not assume 42% reduction in energy production emissions from the State's renewables portfolio standard (33%), natural gas extraction efficiency measures (1.6%), and natural gas transmission and distribution efficiency measures (7.4%).*

Source: DKA Planning, 2022.

Consistency with Applicable Plans and Policies

The discussion below describes the extent the Project complies with or exceeds the performance-based standards included in the City's 2021 CAP. It also provides informational consistency analyses with the *Climate Change Scoping Plan,* the 2020-2045 RTP/SCS, and the Health and Safety Element of the City's General Plan, each of which identify GHG-emissions-reducing measures that directly and indirectly apply to the Proposed Project. As demonstrated herein, the Project would be consistent with the City's CAP and other applicable GHG remissions reduction plans and policies.

City of Paramount 2021 CAP

As illustrated in Table VIII-8, the Project would be consistent with the relevant measures in the City's CAP. While the Project is not residential and would not advance sustainability measures tied to housing, it would generally support residential and commercial growth that requires storage space. Further, as discussed later this analysis, the Project would help reduce GHG emissions consistent with the CAP's overall objective of a 40 percent

reduction from 1990 levels. Thus, the Project would be consistent with the City's 2021 CAP.

Table VIII-8
Consistency with the City's 2021 Climate Action Plan

Measure: Goal	Consistency Analysis
RE1 (Increase Local Renewable Energy Generation): Increase local rooftop solar PV installations by 250 to 500 residential buildings by 2030 from a 2010 baseline; and increase local rooftop solar PV installations by 50 commercial buildings by 2030 from a 2010 baseline.	**Consistent.** The Project's roof includes an area for solar installation.
RE2 (Promote and Maximize Community Choice Energy (CCE) and Utility Clean Energy Offerings): Maintain community enrollment in municipal and community electricity accounts in Clean Power Alliance; and enroll 20% of the community in "Clean" or "100% Green" Clean Power Alliance Options.	**Not Applicable.** This measure calls on the community at large to switch from Southern California Edison and Southern California Gas to the Clean Power Alliance, which has a carbon-free portfolio. The Project would not interfere with utility customers in their decisions about switching utility providers.
RE3 (Promote Electrification of Buildings and Appliances): Increase the number of natural gas appliances (e.g., water heaters, stoves, clothes dryers) replaced with electric or solar alternatives; and decrease number of new buildings and major renovations connecting to natural gas infrastructure.	**Not Applicable.** The Project is a self-storage facility with negligible need for appliances. Given the lack of spaces that need heating, the bulk of energy demand would likely be electrical power.
TR1 (Support Fuel-Efficient and Alternative-Fuel Vehicles): Increase the number of plug-in electric vehicles (PEVs) and other zero-emissions vehicles (ZEVs) in the community to a level in line with state goals, including the Mobile Source Strategy and Governor's Orders calling for 5 million ZEVs in the state by 2030; increase miles driven by ZEVs in the community; and increase the number of electric charging stations within the city.	**Not Applicable.** This measure calls on the community at large to purchase PEVs and ZEVs and replace carbon-based fuel vehicles over time. The Project would not interfere with this measure.
TR2 (Improve Pedestrian and Bicycle Infrastructure): Increase miles dedicated to pedestrian and bicycle paths; and increase number of trips taken by bicycle.	**Not Applicable.** This measure calls on the City to design, fund, and construct infrastructure for active transportation over time. The Project would not interfere with this measure.

Table VIII-8
Consistency with the City's 2021 Climate Action Plan

Measure: Goal	Consistency Analysis
TR3 (Expand Public Transit Options and "First Mile/Last Mile" Connectivity): Increase transit network coverage; increase "first/last mile" transit connectivity; and increase transit ridership.	**Not Applicable.** This measure calls on Los Angeles County Metropolitan Transportation Authority (Metro), and other public agencies to expand public transit options to shift people from cars to alternative transportation modes. The Project would not interfere with this measure.
TR4 (Expand Car Sharing, Bike Sharing, and Ride Sharing): Increase percentage of residents within half-mile of bike share station; and increase percentage of residents within half-mile of care share option/pod.	**Not Applicable.** The Project does not include residential uses.
TR5 (Infrastructure to Improve Traffic Safety and Flow): Add high-occupancy vehicles (HOV) and express lanes along major freeways.	**Not Applicable.** This measure calls on Caltrans, Metro, and other regional agencies to plan, design, and construct carpool lanes. The Project would not interfere with this measure.
TR6 (Support Transportation Demand Management (TDM)): By 2030, achieve 10 percent increase in local companies participating in TDM programs, from a 2010 baseline.	**Not Applicable.** This measure calls the Southern. California Association of Governments, the City, and other public agencies to promote TDM programs to local employers. The Project would not interfere with this measure.
LU1 (Promote Smart Growth, Transit-Oriented Development (TOD) and Complete Neighborhoods): By 2030, increase residential and employment density by 15 percent as compared to business-as-usual.	**Consistent.** The Project will increase the development density on this Project Site, which is zoned M-2 (Heavy Manufacturing). While such zoning does not call for residential and job-dense uses, the Project would support residential and commercial growth that requires more storage.
WA1 (Promote Water Conservation): By 2030, achieve a 30 percent per capita reduction in water consumption from a 2010 baseline.	**Consistent.** The Project is a self-storage facility, a generally passive land use with minimal water consumption, especially as compared to other industrial and commercial land uses.
WA2 (Promote Water Recycling and Greywater Use): Increase the number of greywater and rainwater catchment permits issued annually; and increase extent of purple pip installed and volume of reclaimed water provided to the city.	**Not Applicable.** The Project calls on the Building Division to expand infrastructure that will promote water conservation. The Project would not interfere with this measure.

Table VIII-8
Consistency with the City's 2021 Climate Action Plan

Measure: Goal	Consistency Analysis
WR1 (Solid Waste Diversion Programs): By 2030, strive to divert 90 percent of all solid waste from landfills.	**Consistent.** The Project would be consistent with solid waste regulations, including AB 939, which calls for 50 percent diversion rates for solid waste management agencies. It would also be subject to CALGreen requirements for recycling and/or salvaging 65 percent or more of nonhazardous construction and demolition waste.
GA1 (Support Urban Tree-Planting, Park Access, and Green Infrastructure): Support tree canopy city-wide by 10 percent by 2030; and increase permeable pavement Citywide by 2030.	**Consistent.** The Project would redevelop an industrial site with no landscaping or trees with a ten-foot wide landscape buffer along Minnesota Avenue and five-foot wide landscaping along the side yards and rear yard setbacks.
GA2 (Support Sustainable Food and Urban Farming): Increase number of local farmers and increase number of urban farms and community gardens.	**Not Applicable.** This measure calls for incentives and programs to encourage locally-grown food. This Project would not conflict with this sustainability initiative.
GB1 (Engage and Partner with Local Industries and Businesses to Reduce Emissions): Increase local participation in green business programs; Increase local business participation in utility programs; and raise local awareness of emissions-reduction funding programs.	**Not Applicable.** This measure calls for incentives and programs to encourage green businesses. This Project would not conflict with this sustainability initiative.
GB2 (Grow the Local Green Economy): Increase the number of individuals trained for green jobs; and increase the number of cleantech businesses and jobs.	**Not Applicable.** This measure calls for incentives and programs to encourage green jobs. This Project would not conflict with this sustainability initiative.
Source; DKA Planning 2022	

Climate Change Scoping Plan

The Project would be consistent with its objectives and the GHG reduction-related actions and strategies of the 2017 Scoping Plan. The 2017 Scoping Plan and the SB 32 objectives that drive it involve increasing renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries. Although a number of these strategies are currently promulgated, some have not yet been formally proposed or adopted. It is expected that these measures or similar actions to reduce GHG emissions will be adopted as required to achieve statewide GHG emissions targets. Based on the

analysis in Table VIII-9, the Project would be consistent with the State's Climate Change Scoping Plan and thus, impacts related to consistency with the Scoping Plan would be less than significant impact.

In addition to the Project's consistency with applicable GHG reduction regulations and strategies, the Project would not conflict with future anticipated statewide GHG reductions goals. Specifically, CARB has outlined strategies for achieving the 2030 reduction target of 40 percent below 1990 levels, as mandated by SB 32. These strategies include renewable resources for half of the State's electricity by 2030, increasing the fuel economy of vehicles and the penetration of zero-emission or hybrid vehicles into the vehicle fleet, reducing the rate of growth in VMT, supporting high- speed rail and other alternative transportation options, and use of high-efficiency appliances, water heaters, and HVAC systems.

The Project would also benefit from statewide and utility-provider efforts towards increasing the portion of electricity provided from renewable resources. SCE has committed to increasing renewable sources that exceed the Renewables Portfolio Standard requirements. The Project would also include energy-efficient mechanical systems. The Project would also benefit from statewide efforts to improve fuel economy of vehicles.

Table VIII-9
Consistency Analysis—Climate Change Scoping Plan

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
Senate Bill 350 (SB 350): The Clean Energy and Pollution Reduction Act of 2015 increases the standards of the California RPS program by requiring that the amount of electricity generated and sold to retail customers per year from eligible renewable energy resources be increased to 50 percent by 2030.[a] Required measures include: • Increase RPS to 50 percent of retail sales by 2030. • Establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030. • Reduce GHG emissions in the electricity sector through the implementation of the above measures and other actions as modeled in IRPs to meet GHG emissions reductions planning targets in the IRP process. Load-serving entities and publicly owned utilities meet GHG emissions reductions planning targets	CPUC, CEC, CARB	**Consistent.** The Project Site is located within the service area of SCE and would receive electricity service from SCE. SCE is required to generate electricity that would increase renewable energy resources to 33 percent by 2020 and 50 percent by 2030. As SCE would provide electricity service to the Project Site, by 2030 the Project would use electricity consistent with the requirements of SB 350. As required under SB 350, doubling of the energy efficiency savings from final end uses of retail customers by 2030 would primarily rely on the existing suite of building energy efficiency standards under CCR Title 24, Part 6 (consistency with this regulation is discussed below) and utility-sponsored programs such as rebates for high-efficiency appliances, HVAC systems, and insulation. The Project's compliance with CalGreen and Title 24 energy efficiency standards, which have been incorporated into the City's Green Building Standards Code, would ensure Project consistency with this action/strategy.

Table VIII-9
Consistency Analysis—Climate Change Scoping Plan

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
through a combination of measures as described in IRPs.		
Senate Bill 100 (SB 100): The California Renewables Portfolio Standard Program (2018) requires a Statewide renewables energy portfolio that requires retail sellers to procure renewable energy that is at least 50 percent by December 31, 2026 and 60 percent by December 31, 2030. It would also require that local publicly owned electric utilities procure a minimum quantity of electricity from renewable energy resources achieve 44 percent of retail sales by December 31, 2024 and 60 percent by December 31, 2030	LADWP, CPUC	**Consistent.** The Project Site is located within the service area of SCE and would receive electricity service from SCE. SCE is required to generate electricity that would increase renewable energy resources to 33 percent by 2020 and 50 percent by 2030. The Project's compliance with CalGreen and Title 24 energy efficiency standards, which have been incorporated into the City's Green Building Standards Code, would ensure Project consistency with this action/strategy.
Implement Mobile Source Strategy (Cleaner Technology and Fuels) • At least 1.5 million zero emission and plug-in hybrid light-duty electric vehicles by 2025. • At least 4.2 million zero emission and plug-in hybrid light-duty electric vehicles by 2030. • Further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean Cars regulations. • Medium- and heavy-duty GHG Phase 2.	CARB, CalSTA, SGC, CalTrans CEC, OPR, Local agencies	**Consistent.** CARB approved the Advanced Clean Cars Program in 2012 that establishes an emissions control program for model year 2017 through 2025. Standards under the Advanced Clean Cars Program The Program also requires auto manufacturers to produce an increasing number of zero emission vehicles in the 2018 through 2025 model years. Extension of the Advanced Clean Cars Program has not yet been adopted, but it is expected that measures will be introduced to increase GHG emissions reductions stringency on light duty autos and continue adding zero emission and plug in vehicles through 2030. CARB is also developing the Innovative Clean Transit measure to encourage purchase of advanced technology

Table VIII-9
Consistency Analysis—Climate Change Scoping Plan

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
• Innovative Clean Transit: Transition to a suite of to-be- determined innovative clean transit options. Assumed 20 percent of new urban buses purchased beginning in 2018 will be zero emission buses with the penetration of zero-emission technology ramped up to 100 percent of new sales in 2030. Also, new natural gas buses, starting in 2018, and diesel buses, starting in 2020, meet the optional heavy-duty low-NO_x standard. • Last Mile Delivery: New regulation that would result in the use of low NO_x or cleaner engines and the deployment of increasing numbers of zero-emission trucks primarily for class 3-7 last mile delivery trucks in California. This measure assumes ZEVs comprise 2.5 percent of new Class 3–7 truck sales in local fleets starting in 2020, increasing to 10 percent in 2025 and remaining flat through 2030. • Further reduce VMT through continued implementation of SB 375 and regional Sustainable Communities Strategies; forthcoming statewide implementation of SB 743; and potential additional VMT reduction strategies not specified in the Mobile Source Strategy but included in		buses such as alternative fueled or battery powered buses. This would allow fleets to phase in cleaner technology in the near future. CARB is also in the process of developing proposals for new approaches and strategies to achieve zero emission trucks under the Advanced Clean Local Trucks (Last Mile Delivery) Program.[b,c] GHG emissions generated by Project-related vehicular travel would benefit from this regulation, and mobile source emissions generated by the Project would be reduced with implementation of standards under the Advanced Clean Cars Program, consistent with reduction of GHG emissions under AB 32. Mobile source GHG emissions estimates conservatively do not include this additional 34-percent reduction in mobile source emissions, as the CalEEMod model does not yet account for this regulation. Although the Innovative Clean Transit and Advanced Clean Local Truck Programs have not yet been established, the Project would also benefit from these measures once adopted. SB 375 requires SCAG to direct the development of the SCS for the region, which is discussed further below. The Project represents an infill development within an existing urbanized area. Therefore, the Project would be consistent with SB 375 and the 2020-2045. RTP/SCS.

Table VIII-9
Consistency Analysis—Climate Change Scoping Plan

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
the document "Potential VMT Reduction Strategies for Discussion."		
Increase Stringency of SB 375 Sustainable Communities Strategy (2035 Targets)	CARB	**Consistent.** Under SB 375, the CARB sets regional targets for GHG emission reductions from passenger vehicle use. In 2010, the CARB established targets for 2020 and 2035 for each region. As required under SB 375, the CARB is required to update regional GHG emissions targets every 8 years. As part of the 2018 updates, the CARB has proposed a passenger vehicle related GHG emissions reduction of 19 percent for 2035 for the SCAG region, which is more stringent than the current reduction target of 13 percent for 2035. The Project would help achieve GHG emissions reductions from passenger vehicle use as a result of the Project's infill nature and provision of a self-storage use within proximity to a residential population with storage needs.
By 2019, adjust performance measures used to select and design transportation facilities. • Harmonize project performance with emissions reductions, and increase competitiveness of transit and active transportation modes (e.g. via guideline documents, funding programs, project selection).	CalSTA and SGC, OPR, CARB, GoBiz, IBank, DOF, CTC, Caltrans	**Not Applicable.** The Project does not include construction of transportation facilities.
By 2019, develop pricing policies to support low-GHG transportation (e.g. low-emission	CalSTA, Caltrans, CTC,	**Not Applicable.** The Project is not involved in policy making. However, the Project would help achieve GHG

Table VIII-9
Consistency Analysis—Climate Change Scoping Plan

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
vehicle zones for heavy duty, road user, parking pricing, transit discounts).	OPR/SGC, CARB	emissions reductions from passenger vehicle use as a result of the Project's infill nature and provision of a self-storage use within proximity to a residential population with storage needs.
Implement California Sustainable Freight Action Plan: • Improve freight system efficiency. • Deploy over 100,000 freight vehicles and equipment capable of zero emission operation and maximize zero and near-zero emission freight vehicles and equipment powered by renewable energy by 2030.	CARB	**Not Applicable.** The Project land uses would not include freight transportation or warehousing. However, the Project would not interfere or impede the implementation of the Sustainable Freight Action Plan.
Adopt a Low Carbon Fuel Standard with a CI reduction of 18 percent.	CARB	**Not Applicable.** This regulatory program applies to fuel suppliers, not directly to land use development. GHG emissions related to vehicular travel associated with the Project would benefit from this regulation, because fuel used by Project-related vehicles would be required to comply with LCFS. Mobile source GHG emissions estimates were calculated using CalEEMod that includes implementation of the LCFS into mobile source emission factors. The current LCFS, adopted in 2007, requires a reduction of at least 10 percent in the carbon intensity (CI) of California's transportation fuels by 2020. On September 27, 2018, CARB amended the LCFS regulation to target a 20 percent reduction in CI from a 2010 baseline by 2030.

Table VIII-9
Consistency Analysis—Climate Change Scoping Plan

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
Implement the Short-Lived Climate Pollutant Strategy by 2030: • 40 percent reduction in methane and hydrofluorocarbon emissions below 2013 levels. • 50 percent reduction in black carbon emissions below 2013 levels.	CARB, CalRecycle, CDFA, SWRCB, Local air districts	**No Conflict.** Senate Bill 605 (SB 605) was adopted in 2014 and directs CARB to develop a comprehensive Short-Lived Climate Pollutant (SLCP) strategy. Senate Bill 1383 was later adopted in 2016 to require CARB to set statewide 2030 emission reduction targets of 40 percent for methane and hydrofluorocarbons and 50 percent black carbon emissions below 2013 levels. The Project would comply with the CARB SLCP Reduction Strategy by using HVAC equipment with lower GWP refrigerants.
Implement the post-2020 Cap-and-Trade Program with declining annual caps.	CARB	**Not Applicable.** This applies to state regulators and is not applicable to a development project. The current Cap-and-Trade program would end on December 31, 2020. Assembly Bill 398 (AB 398) was enacted in 2017 to extend and clarify the role of the state's Cap-and-Trade Program from January 1, 2021, through December 31, 2030. As part of AB 398, refinements were made to the Cap-and-Trade program to establish updated protocols and allocation of proceeds to reduce GHG emissions.
Establish a carbon accounting framework for natural and working lands as described in SB 859 by 2018	CARB	**Not Applicable.** This applies to state regulators and is not applicable to a development project**.** This regulatory program applies to Natural and Working Lands, not directly related to development of the Project. However, the Project would not interfere or impede implementation of the Integrated Natural and Working Lands Implementation Plan.
Implement Forest Carbon Plan	CNRA, CAL FIRE, CalEPA and	**Not Applicable.** This applies to state regulators and is not applicable to a development project**.** This regulatory program applies to state and federal forest land, not directly related to development of the Project. However,

Table VIII-9
Consistency Analysis—Climate Change Scoping Plan

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
	departments within	the Project would not interfere or impede implementation of the Forest Carbon Plan.
Identify and expand funding and financing mechanisms to support GHG reductions across all sectors.	State Agencies & Local Agencies	**Not Applicable.** This applies to state regulators and is not applicable to a development project**.** Funding and financing mechanisms are the responsibility of the state and local agencies. The Project would not conflict with funding and financing mechanisms to support GHG reductions.

[a] *Senate Bill 350 (2015–2016 Regular Session) Stats 2015, Ch. 547.*
[b] *CARB, Advance Clean Cars, Midterm Review, www.arb.ca.gov/msprog/acc/acc-mtr.htm.*
[c] *CARB, Advanced Clean Local Trucks (Last mile delivery and local trucks), www.arb.ca.gov/msprog/actruck/actruck.htm.*
[d] *CARB, LCFS Rulemaking Documents, www.arb.ca.gov/fuels/lcfs/rulemakingdocs.htm.*
[e] *CARB, Reducing Short-Lived Climate Pollutants in California, www.arb.ca.gov/cc/shortlived/shortlived.htm.*
[f] *CARB, Short-Lived Climate Pollutants (SLCP): Organic Waste Methane Emissions Reductions, www.calrecycle.ca.gov/climate/slcp/.*

Source: California Air Resources Board (CARB), California's 2017 Climate Change Scoping Plan, November 2017.

Regional: 2020-2045 RTP/SCS

On September 3, 2020, SCAG adopted the 2020-2045 RTP/SCS, which calls for more than $638 billion in transportation system investments through 2045. It was prepared through a collaborative, continuous, and comprehensive process with input from local governments, county transportation commissions, tribal governments, non-profit organizations, businesses, and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. The 2020-2045 RTP/SCS includes strategies for accommodating projected population, household, and employment growth in the SCAG region by 2045 as well as a transportation investment strategy for the region. These land use strategies are directly tied to supporting related GHG emissions reductions through increasing transportation choices with a reduced dependence on automobiles and an increased growth in walkable, mixed-use communities and HQTAs and by encouraging growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, supporting implementation of sustainability policies, and promoting a green region. Table VIII-10 provides a comparison of the Project against the GHG-related performance measures of the 2020-2045 RTP/SCS.

Table VIII-10
Consistency with the 2020-2045 RTP/SCS

Objectives	Consistency Analysis[a]
Increase percentage of region's total household growth occurring within HQTAs.	**Not Applicable.** The Project does not include residential uses. Nevertheless, the Project would not reduce housing stock in the City and would not inhibit the City's efforts to add to the supply and diversity of housing in metropolitan Los Angeles County.
Increase percent of the region's total employment growth occurring within HQTAs.	**Consistent.** The Project is an infill development that would create jobs, consistent with the 2020-2045 RTP/SCS policies and would focus on growth in in an urban setting.
Decrease total acreage of greenfield or otherwise rural land uses converted to urban use.	**Consistent.** The Project is an infill development that would not add to sprawl development in greenfield or rural areas on the fringes of Southern California.
Decrease daily vehicle miles driven per person.	**Consistent.** The Project is an infill development that would provide a self-storage use for residents in the surrounding area, minimizing travel distances of Project users. Self-storage users do not typically drive to and from their storage units on a daily basis. Employees of the Project could use existing transit located near the Project

Table VIII-10
Consistency with the 2020-2045 RTP/SCS

Objectives	Consistency Analysis[a]
	Site on Alondra Boulevard and Garfield Avenue, thereby contributing toward reducing traffic congestion.
Decrease average daily distance traveled for work and non-work trips (in miles).	**Consistent.** The Project is an infill development that would provide a self-storage use for residents in the surrounding area, minimizing travel distances of Project users. Self-storage users do not typically drive to and from their storage units on a daily basis. Employees of the Project could use existing transit located near the Project Site on Alondra Boulevard and Garfield Avenue, thereby contributing toward reducing traffic congestion.
Increase percentage of work and non-work trips which are less than 3 miles in length.	**Consistent.** The Project is an infill development that would provide a self-storage use for residents in the surrounding area, minimizing the number of trips and travel distances of Project users. Self-storage users do not typically drive to and from their storage units on a daily basis.
Increase share of short trip lengths for commute purposes.	**Consistent.** Employees of the Project could use existing transit located near the Project Site on Alondra Boulevard and Garfield Avenue, thereby contributing toward reducing traffic congestion.
Decrease average minutes of delay experienced per capita due to traffic congestion.	**Consistent.** The Project is an infill development that would provide a self-storage use for residents in the surrounding area, minimizing vehicle trips, travel distances and duration, and traffic congestion. Self-storage users do not typically drive to and from their storage units on a daily basis. Employees of the Project could use existing transit located near the Project Site on Alondra Boulevard and Garfield Avenue, thereby contributing toward reducing traffic congestion.
Decrease excess travel time resulting from the difference between a reference speed and actual speed.	**Not Applicable.** As a self-storage development, the Project would not affect reference or actual traffic speeds.

Table VIII-10
Consistency with the 2020-2045 RTP/SCS

Objectives	Consistency Analysis[a]
Decrease excess travel time for heavy-duty trucks result from the difference between reference speed and actual speed.	**Not Applicable.** As a self-storage development, the Project would not generate heavy-duty truck traffic and as such, the Project would not affect heavy-duty truck travel.
Increase percentage of PM peak period trips completed within 45 minutes by travel mode.	**Consistent.** The Project is an infill development that would provide a self-storage use for residents in the surrounding area, minimizing PM peak-hour trips and travel distance and duration. Self-storage users do not typically drive to and from their storage units on a daily basis. Employees of the Project could use existing transit located near the Project Site on Alondra Boulevard and Garfield Avenue.
Increase percentage of trips that use transit (work and all trips).	**Consistent.** The Project is an infill development that would provide self-storage uses for residents in the surrounding area. Self-storage users do not typically drive to and from their storage units on a daily basis. Employees of the Project could use existing transit located near the Project Site on Alondra Boulevard and Garfield Avenue.
Decrease average travel time to work (all modes).	**Consistent.** Employees of the Project could use existing transit located near the Project Site on Alondra Boulevard and Vermont Avenue.
Increase percentage of trips using either walking or biking (by trip type).	**Consistent.** The Project would include bicycle parking, which would provide employees of the Project the option to cycle to/from work.
Reduce per capita GHG emissions (from 2005 levels).	**Consistent.** The Project would contribute to a reduction of GHG emissions when compared to 2005 levels, by virtue of the Project's infill nature and close proximity to residents in need of a self-storage use, thereby minimizing the number of traffic trips, trip length, and trip duration and as such, minimizing associated GHG emissions.

Table VIII-10
Consistency with the 2020-2045 RTP/SCS

Objectives	Consistency Analysis[a]
Increase percentage of trips using a travel mode other than single occupancy vehicle (SOV).	**Consistent.** The purpose of the Objective is ultimately to reduce the number of vehicles on the road by encouraging SOV drivers to choose ride-share or alternative transportation options. The Project includes development of a self-storage facility, which does not generate a predictable daily pattern of traffic trips, like residential uses or typical commercial uses that provide employment and generate commuter trips. Self-storage users are not likely to use ride-share, transit, or cycling options to travel to/from the Project Site. However, because the target users of the proposed self-storage facility are residents that live within close proximity to the Project Site who are in need of storage options, the Project would minimize traffic trips in general.
Source: 2020-2045 RTP/SCS, September 2020.	

City of Paramount General Plan Health and Safety Element

The Project would be consistent with the City's General Plan. While the Health and Safety Element addresses global climate change, the element's 17 policies are geared toward Citywide efforts to develop strategies to address community resiliency and adaptation to climate change's impacts. As such, they do not apply to development projects. One exception is Policy 52, which calls to "[i]mprove the energy efficiency and weatherization of homes and businesses to reduce energy costs and carbon pollution." The Project would do that by replacing older, energy inefficient uses with a new development that would comply with current Title 24 and Green Building requirements, which would conserve energy and water use.

Conclusion

In summary, the consistency analysis provided above demonstrates that the Project complies with the applicable plans, policies, regulations, and GHG emissions reduction actions/strategies outlined in the *Climate Change Scoping Plan and Update*, the 2020–2045 RTP/SCS, and the City's Health and Safety Element. Consistency with the above plans, policies, regulations, and GHG emissions reduction actions/strategies would reduce the Project's incremental contribution of GHG emissions. Thus, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the

purpose of reducing emissions of GHG emissions. Furthermore, because the Project is consistent and does not conflict with these plans, policies, and regulations, the Project's incremental increase in GHG emissions as described above would not result in a significant impact on the environment. Therefore, Project-specific impacts with regard to climate change would be less than significant.

Post-2030 Considerations

Recent studies show that the state's existing and proposed regulatory framework will put the state on a pathway to reduce its GHG emissions level to 40 percent below 1990 levels by 2030 and to 80 percent below 1990 levels by 2050, if additional appropriate reduction measures are adopted.[33] Even though these studies did not provide an exact regulatory and technological roadmap to achieve the 2030 and 2050 goals, they demonstrated that various combinations of policies could allow the statewide emissions level to remain very low through 2050, suggesting that the combination of new technologies and other regulations not analyzed in the studies could allow the state to meet the 2050 target. Subsequent to the findings of these studies, SB 32 was passed on September 8, 2016, and requires CARB to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. As discussed above, the new plan outlined in SB 32, involves increasing renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries.

As discussed above, SCAG's 2020-2045 RTP/SCS establishes a regulatory framework for achieving GHG emissions reductions from the land use and transportation sectors pursuant to SB 375 and the state's long-term climate policies. The 2020-2045 RTP/SCS ensures VMT reductions and other measures that reduce regional emissions from the land use and transportation sectors.

The Project is the type of land use development that is encouraged by the 2020-2045 RTP/SCS to reduce VMT and expand multi-modal transportation options in order for the region to achieve the GHG emissions reductions from the land use and transportation sectors required by SB 375, which in turn, advances the state's long-term climate policies. By furthering implementation of SB 375, the Project supports regional land use and transportation GHG reductions consistent with state climate targets for 2030 and beyond. In addition, the Project would be consistent with the Actions and Strategies set forth in

[33] *Energy and Environmental Economics (E3). "Summary of the California State Agencies' PATHWAYS Project: Long-term Greenhouse Gas Reduction Scenarios" (April 2015); Greenblatt, Jeffrey, Energy Policy, "Modeling California Impacts on Greenhouse Gas Emissions" (Vol. 78, pp. 158–172). The California Air Resources Board, California Energy Commission, California Public Utilities Commission, and the California Independent System Operator engaged E3 to evaluate the feasibility and cost of a range of potential 2030 targets along the way to the state's goal of reducing GHG emissions to 80 percent below 1990 levels by 2050. With input from the agencies, E3 developed scenarios that explore the potential pace at which emission reductions can be achieved, as well as the mix of technologies and practices deployed. E3 conducted the analysis using its California PATHWAYS model. Enhanced specifically for this study, the model encompasses the entire California economy with detailed representations of the buildings, industry, transportation and electricity sectors.*

the 2020-2045 RTP/SCS. Therefore, the Project would be consistent with the 2020-2045 RTP/SCS.

Locally, the City will likely update its 2021 CAP to address long-term 2050 climate change objectives. As with the State and regional plans, the Project would incrementally help implement the City's CAP and reduce its carbon footprint over time.

Cumulative Impacts

The analysis of the Project's GHG emissions impacts above is a cumulative impact analysis. As concluded there, the Project's contribution to GHG emissions impacts would not be cumulatively considerable.

Mitigation Measures

No significant impacts related to GHG emissions have been identified, and no mitigation measures are required.

IX. HAZARDS AND HAZARDOUS MATERIALS

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

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

Less Than Significant Impact. During the Project's construction phase, the types of hazardous materials that could be used would be typical materials necessary for construction of a commercial development (e.g., paints, solvents, fuel for construction equipment, building materials, etc.). Although construction of the Project would require

the temporary transport, use, and disposal of hazardous waste, construction activities associated with Project would be conducted in accordance with all applicable federal, state, and local regulations governing such activities.

As a self-storage facility, the types of hazardous materials that could be used as part of its operation would include cleaning supplies and landscaping fertilizers/pesticides that are typical of a self-storage use, all of which would be used and stored in accordance with manufacturer requirements. In addition, the storage of hazardous materials would be prohibited within the individual storage units. Thus, the Project would not require the routine transport, use, or disposal of hazardous materials that would pose a significant hazard to the public or environment. Therefore, Project impacts related to hazardous materials would be less than significant.

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

Less Than Significant Impact. A Phase I Environmental Site Assessment (Phase I ESA) was prepared for the Project (refer to Appendix F) by Salem Engineering Group, Inc. (Salem). The purpose of the Phase I ESA was to determine if there are any recognized environmental concerns (RECs) associated with the Project Site.[34] The Phase I ESA included site reconnaissance, a review of current and historical data describing the development of the Project Site, and an environmental records search. Salem noted no RECs, historical RECs, controlled RECs, or de minimis conditions were identified in connection with the Project Site. Additionally, no off-site RECs were identified that would impact the Project Site.

Given the age of the existing structures, it is possible that asbestos-containing materials (ACMs) and lead-based paint (LBP) could be encountered at the Project Site during the demolition and remodeling period. As such, the Project Applicant would be required, as part of the Project permitting process, to provide a letter to the Building and Safety Division from a qualified asbestos abatement consultant indicating that no ACMs are present in the building. If ACMs are found to be present, the ACMs would need to be abated in compliance with CAQMD's Rule 1403, as well as other applicable state and federal rules and regulations. Also, the Project Applicant would be required as part of the Project permitting process to submit an LBP survey to the Building and Safety Division. Should LBP materials be identified, standard handling and disposal practices shall be implemented pursuant to Occupational Safety and Health Administration (OSHA) regulations.

[34] *An REC is defined by the ASTM Standard Practice E1527-13 as the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment.*

For these reasons, the Project would not create significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Therefore, Project impacts related to this issue would be less than significant.

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

No Impact. No schools are located within 0.25 miles of the Project Site. The school closest to the Project Site is Wesley Gaines Elementary School, located approximately 0.4 miles southwest of the Project Site. Thus, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Therefore, no impacts related to this issue would occur.

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

No Impact. The Project is not included on any list compiled pursuant to Government Code Section 65962.5 (i.e., certain hazardous waste facilities, sites that include leaking USTs, landfills with migrating hazardous waste).[35] Thus, the Project would not create a significant hazard to the public or the environment as a result of being listed on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, no impacts related to this issue would occur.

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

No Impact. The Project Site is not located within two miles of a public airport. The closest airport is the Compton/Woodley Airport located approximately 4.2 miles west of the site. The Project would not result in a safety hazard or excessive noise for people residing or working in the Project Site area. Therefore, no impacts related to this issue would occur.

f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

No Impact. The Project would not require the closure of any public or private streets and would not impede emergency vehicle access to the Project Site or surrounding area. All construction staging for the Project would occur on the Project Site and would not interfere

35 *Department of Toxic Substance Control, https://www.envirostor.dtsc.ca.gov/public/map/?myaddress, accessed July 2022.*

with travel conditions near the site. Thus, the Project would not impair implementation of or physically interfere with the Local Hazard Mitigation Plan or any other adopted emergency response plan or emergency evacuation plan. Therefore, no impacts related to this issue would occur as a result of the Project.

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

No Impact. The Project is located in a highly urbanized area of the City that is not subject to wildland fires. Therefore, the Project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. No mitigation measures are required.

Cumulative Impacts

The geographic extent of the Project's environmental impacts is limited to the Project Site and would not contribute to any other potential environmental impact that may occur beyond the boundaries of the Project Site. All related projects would be subject to discretionary or ministerial review by their respective jurisdictions, which would be responsible for assessing potential hazards risks associated with those related projects, and if necessary, the applicants of those projects would be required to implement measures appropriate for the type and extent of hazardous materials present and the land use proposed to reduce the risk associated with the hazardous materials to an acceptable level. As stated previously, with mitigation, the Project would not result in any significant impacts related to hazards and hazardous materials. Therefore, no significant Project cumulative impacts related to hazards and hazardous materials would occur.

Mitigation Measures

No significant impacts related to hazards and hazardous materials have been identified, and no mitigation measures are required.

X. HYDROLOGY AND WATER QUALITY

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

a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater?

Less Than Significant Impact. In its existing condition, the Project Site is completely developed with impervious surfaces (i.e., buildings and asphalt/concrete). During storm events, stormwater that encounters the Project Site sheet flows to Minnesota Avenue and to the City's local storm drain system. For the Project's construction and operational phases, the Project Applicant would be required to prepare a LID report that outlines construction and post-construction BMPs. Per Chapter 8.20 of the City's Municipal Code, no person shall commence any construction activity for which a permit is required by Chapter 10 of the Municipal Code without implementing all stormwater and runoff pollution measures required by such permit. The Project Applicant would be required to adhere to the minimum BMPs for the construction site that could include: limiting grading during rain events; planting vegetation on slopes; covering slopes susceptible to erosion; maintaining stockpiles of soil on-site; and containing runoff, spills, and equipment on-site. Post-construction BMPs could include measures designed to control pollutants, pollutant loads, and runoff volume to the maximum extent feasible by minimizing impervious surface area and controlling runoff from impervious surfaces through infiltration, evapotranspiration, bioretention, and/or rainfall harvest and use. The LID report would also outline standards and practices for stormwater pollution mitigation and provide documentation to demonstrate compliance with the municipal NPDES permit on Project plans and permit application submitted to the City. Through compliance with existing regulations, Project impacts related to water quality would be less than significant.

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

No Impact. In its existing condition, the Project Site is completely developed with impervious surfaces (i.e., buildings and asphalt/concrete). During storm events, stormwater that encounters the Project Site sheet flows to Minnesota Avenue and to the City's local storm drain system. No stormwater at the Project Site reaches groundwater levels. As such, the Project Site is not a source of groundwater recharge. Under the Project, all stormwater would be directed toward a BMP structure and/or the local storm drain system. Additionally, all water consumption associated with the Project would be supplied by the City. Thus, the Project would have no effect on groundwater supplies or recharge, and no impacts related to this issue would occur.

c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner, which would result in substantial erosion or siltation on- or off-site?

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

Less Than Significant Impact. Refer to response to Checklist Question X(b) (Hydrology and Water Quality – Soil Erosion/Loss of Topsoil).

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

Less Than Significant Impact. As stated previously, in its existing condition, the Project Site is completely developed with impervious surfaces (i.e., buildings and asphalt/concrete). During storm events, stormwater that encounters the Project Site sheet flows to Minnesota Avenue and to the City's local storm drain system. The Project includes the demolition and removal of the existing buildings from the Project Site and the development of the site with a 104,630-square-foot self-storage building and associated surface parking and landscaping. The Project would not change the amount of impervious surface at the Project Site or the amount of stormwater flow compared to the existing condition. Nonetheless, the Project Applicant would still be required to implement BMPs and to develop appropriate drainage infrastructure on the site to meet regulatory water quality requirements and to control drainage from the site to not exceed existing rates. Thus, the Project would not increase the runoff from the site entering the City's existing storm drain facilities. As such, the Project would not cause flooding on- or off-site. Therefore, Project impacts related to surface runoff would be less than significant.

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

Less Than Significant Impact. As stated previously, in its existing condition, the Project Site is completely developed with impervious surfaces (i.e., buildings and asphalt/concrete). During storm events, stormwater that encounters the Project Site sheet flows to Minnesota Avenue and to the City's local storm drain system. The Project includes the demolition and removal of the existing buildings from the Project Site and the development of the site with a 104,630-square-foot self-storage building and associated surface parking and landscaping. The Project would not change the amount of impervious surface at the Project Site or the amount of stormwater flow compared to the existing condition. Nonetheless, the Project Applicant would still be required to implement BMPs and to develop appropriate drainage infrastructure on the site to meet regulatory water quality requirements and to control drainage from the Project Site to not exceed existing rates. Thus, the Project would not increase the runoff from the site entering the City's existing storm drain facilities. As such, the Project would not exceed the capacity of the

existing or planning drainage system. Therefore, Project impacts related to storm drain capacity would be less than significant.

iv) Impede or redirect flood flows?

No Impact. The Project Site is located in an area of minimal flood risk (Zone X) and is not located within a 100-year zone, as mapped by the Federal Emergency Management Agency (FEMA).[36] Thus, the Project would not have the potential to impede or redirect flood flows. Therefore, no impacts related to this issue would occur. No mitigation measures are required.

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

No Impact. The Project Site is not located near any large bodies of water and is not in an area susceptible to seiche or tsunamis. Therefore, the Project would not create a risk of release of pollutants due to project inundation associated with a flood hazard, tsunami, or seiche.

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

Less Than Significant Impact. As discussed previously in response to Checklist Question X(a) (Hydrology and Water Quality – Water Quality), Project impacts related to water quality would be less than significant. As discussed in response to Checklist Question X(b) (Hydrology and Water Quality – Groundwater), no impacts related to groundwater would occur as a result of the Project.

Cumulative Impacts

There are six related projects in the City (refer to Appendix A). The site of the Project and the related projects are located in an urbanized area where most of the surrounding properties are already developed. The existing storm drainage system serving this area has been designed to accommodate runoff from an urban built-out environment. When new construction occurs, it generally does not lead to substantial additional runoff, since new developments are required to control the amount and quality of stormwater runoff coming from their respective sites. Additionally, all new development in the City is required to comply with the City's LID requirements and incorporate appropriate stormwater pollution control measures into the design plans to ensure that water quality impacts are minimized. Therefore, cumulative impacts related to hydrology and water quality would be less than significant.

36 *FEMA, https://msc.fema.gov/portal/search?AddressQuery#searchresultsanchor, accessed July 12, 2022.*

Mitigation Measures

No significant impacts related to hydrology and water quality have been identified, and no mitigation measures are required.

XI. LAND USE AND PLANNING

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

a) Would the project physically divide an established community?

No Impact. The Project Site is located in an urbanized area of the City and is currently developed. The Project Site is surrounded by existing development and roadway and utility infrastructure. Thus, the Project would not physically divide an established community. Therefore, no impacts related to this issue would occur as a result of the Project.

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

Less Than Significant Impact. As discussed below, the Project would be substantially consistent with all applicable plans, policies, and regulations associated with development of the Project Site and would not result in any significant environmental impacts due to land use conflicts. Therefore, Project impacts related to this issue would be less than significant.

Regulatory Framework

Regional Plans

Southern California Association of Governments

SCAG functions as the Metropolitan Planning Organization for six counties: Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The SCAG region encompasses a population exceeding 18 million persons in an area of more than 38,000 square miles. As the federally-designated MPO, SCAG is mandated to research and create plans for transportation, growth management, hazardous waste management, and air quality. Applicable SCAG publications are discussed below.

2020-2045 RTP/SCS

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

In September 2008 Governor Arnold Schwarzenegger signed the Sustainable Communities and Climate Protection Act of 2008, also known as SB 375, to align regional planning for housing and transportation with the GHG reduction goals outlined by AB 32. SB 375 requires each Metropolitan Planning Organization (MPO) to adopt a Sustainable Community Strategy (SCS) encouraging compact development that reduces passenger Vehicle Miles Traveled (VMT) and trips, all for the purpose of meeting CARB-determined regional GHG emissions reduction targets.

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment. As the federally-designated MPO for the six-county Southern California region, SCAG is required by law to ensure that transportation activities conform to, and are supportive of, regional and state air quality plan goals to attain NAAQS. SCAG is also a co-producer, with the SCAQMD, of the transportation strategy and transportation control measure sections of the Basin's AQMP.

CARB set GHG reduction targets of 8 percent by 2020 and 19 percent by 2035 (compared with 2005 levels) for the SCAG region, effective as of October 1, 2018. Adopted on September 3, 2020, SCAG's long-range plan, the 2020-2045 RTP/SCS (Connect SoCal), serves as the roadmap to fulfilling the region's compliance with these latest GHG reduction targets. To this end, the 2020-2045 RTP/SCS recognizes that transportation investments and future land use patterns are inextricably linked and acknowledges how this relationship can help the region make choices that sustain existing resources while expanding efficiency, mobility, and accessibility for people across the region. The 2020-2045 RTP/SCS land use pattern continues the trend of focusing new housing and employment growth in the region's High Quality Transit Areas (HQTAs) and aims to enhance and build out the region's transit network. At the time of the previous 2016-2040 RTP/SCS, HQTAs accounted for just 3 percent of total land in the SCAG region, but they are projected to accommodate 46 percent of the region's future household growth and 55

percent of the region's future employment growth by 2040.[37] HQTAs are a cornerstone of land use planning best practice in the SCAG region, and studies by the California Department of Transportation, the USEPA, and the Metropolitan Transportation Commission have found that focusing development in areas served by transit can result in local, regional, and statewide benefits including reduced air pollution and energy consumption. In addition, HQTAs concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability. As a result, HQTAs are vital to the attainment of regional GHG emissions reduction targets: successful implementation of the 2020-2045 RTP/SCS would result in more complete communities with a variety of transportation and housing choices, reducing automobile use and, crucially, associated GHG emissions.

Discussion of Project Consistency with the 2020-2045 RTP/SCS

The Project's consistency with the 2020-2045 RTP/SCS is discussed in Table VIII-9 in response to Checklist Question VIII (b) (Greenhouse Gas Emissions – Consistency with GHG Emissions Reduction Plans, Policies, or Regulations). As discussed there, the Project would be substantially consistent with the 2020-2045 RTP/SCS. Therefore, no impacts related to consistency with the 2020-2045 RTP/SCS would occur as a result of the Project.

South Coast Air Quality Management District

Air Quality Management Plan

The Project Site is located within the jurisdiction of the SCAQMD. In conjunction with SCAG, the SCAQMD is responsible for formulating and implementing air pollution control strategies, including periodic updates to the AQMP, and guidance to local government about how to incorporate these strategies into their land use plans and decisions about development.

SCAG is responsible for generating the socio-economic profiles and growth forecasts on which land use, transportation, and air quality management and implementation plans are based. The growth forecasts provide the socioeconomic data used to estimate vehicle trips and VMT. Emission estimates then can be forecast by SCAQMD based on these projected estimates. Reductions in emissions due to changes in the socio-economic profile of the region are an important way of taking account of changes in land use patterns. For example, changes in jobs/housing balance induced by changes in urban form and transit-oriented development induce changes in VMT by more closely linking

[37] *SCAG, Final 2016-2040 RTP/SCS, April 2017. HQTAs are defined as areas within one-half mile of a fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes or less during peak commuting hours.*

housing to jobs. Thus, socio-economic growth forecasts are a key component to guide the Basin toward attainment of the NAAQS.

The current AQMP establishes a comprehensive regional air pollution control program leading to the attainment of State and federal air quality standards in the Basin. In addition to setting minimum acceptable exposure standards for specified pollutants, the AQMP incorporates SCAG's growth management strategies that can be used to reduce vehicle trips and VMT, and hence air pollution. These include, for example, co-location of employment and housing, and mixed-use land patterns that allow the integration of residential and non-residential uses.

Discussion of Project Consistency with the AQMP

Consistency of the Project with the AQMP is discussed in response to Checklist Question III(a) (Air Quality – AQMP Consistency). As discussed there, the Project would be substantially consistent with the AQMP. Therefore, no impacts related to consistency with the AQMP would occur as a result of the Project.

Local Plans

City of Paramount

General Plan

The Paramount General Plan consists of an integrated and internally consistent set of policies and programs that address the seven issue areas that the State requires local general plans to consider: land use, circulation, housing, noise, safety, conservation, and open space. In addition, the General Plan addresses other issues of concern to the community, including economic development, urban design, recreation, and environmental justice. Environmental justice is defined as the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental regulations and policies implemented by local agencies. Fair treatment means that no group of people should bear a disproportionate share of the negative environmental consequences resulting from industrial, governmental, and commercial operations and policies, whether recent or from decade-old decisions that may even predate City incorporation.

The Paramount General Plan consists of nine elements (including a standalone Environmental Justice Element) that comply with the requirements of California Government Code Section 65300, et. seq. The elements that comprise the Paramount General Plan include the following:

- The *Land Use Element* designates the general distribution and intensity of land use and development contemplated within the land area governed by the General Plan. This Element complies with state requirements for a land use element.

- The *Transportation Element* identifies the location and extent of existing and proposed streets and roadways, intersection improvements, public transit facilities, railroads, transportation terminals, and other transportation facilities. This Element complies with state requirements for a circulation element.

- The *Resources Element* indicates the City's policies with respect to the conservation and preservation of important natural and man-made resources. This Element complies with state requirements for both a conservation element and an open space element. The scope of this Element has also been expanded to consider issues related to parks and recreation.

- The *Health and Safety Element* identifies the City's policy relative to the reduction and mitigation of natural hazards as a means to improve the safety of its citizens. This Element complies with state requirements for both a noise element and a safety element.

- The *Economic Development Element* indicates the City's policies concerning the continued economic revitalization of the commercial and industrial districts in Paramount. This Element is an optional element in that it is not specifically required by state law.

- The *Public Facilities Element* identifies policies and programs with respect to those public facilities that serve the community. This Element is also an optional element.

- The *Housing Element* details plans and programs for the rehabilitation of existing housing, and the development of new housing to accommodate future demand. This Element was certified by the State Department of Housing and Community Development as complying with state law.

- The *Environmental Justice Element* includes a comprehensive set of goals and policies aimed at increasing the influence of disadvantaged communities in the public decision-making process and reducing their exposure to environmental hazards.

- The *Implementation Element* details the programs that will be effective in ensuring that the policies and plans contained in the Paramount General Plan become reality.

Discussion of Project Consistency with the General Plan

Consistency of the Project with the General Plan is discussed in Table XI-1. As discussed therein, the Project would be substantially consistent with the applicable General Plan goals, objectives, and policies. Therefore, Project impacts related to consistency with the General Plan would be less than significant.

Table XI-1
Project Consistency with the General Plan

Applicable Polices	Project Consistency
Land Use Element	
Policy 1. The City of Paramount will continue to stimulate large-scale transition to industrial development in the central portion of the City between Paramount Boulevard and Garfield Avenue.	**Potentially Inconsistent.** The Project includes replacement of worn, aging industrial/manufacturing buildings with a self-storage facility. Additionally, the Project includes a zone change from M-2 to Planned Development with Performance Standards. Although a self-storage use is not an industrial use, it a use that is compatible with industrial uses.
Policy 2. The City of Paramount will continue to improve the character of individual neighborhoods through City policies designed to protect and preserve a high quality of life in Paramount.	**Consistent.** The Project includes replacement of worn, aging buildings with a self-storage facility, which would reflect contemporary architecture, design, and building standards. Additionally, the Project would be required to undergo Design Review by the City to ensure the Project complies with the City's design requirements.
Policy 4. The City of Paramount will limit the intrusion of dissimilar uses as a means to minimize potential land use conflicts and incompatibility in the future.	**Consistent.** Although the Project is not a manufacturing or industrial use, the proposed self-storage use would be compatible with the surrounding manufacturing/industrial uses in that the Project would not add a permanent residential use to the site (a use that can conflict with manufacturing/industrial uses), and the Project would have a minimal number of employees, occupying the Project Site for approximately 1/3 of the day. Also, users of the Project would come and go from the site and would not spend long periods of time at the Project Site, thereby reducing the potential for conflicts to occur with adjacent uses.
Policy 5. The City of Paramount, through continued comprehensive land use planning, will strive to preserve the overall mix of land uses and development in the City.	**Consistent.** The Project would help support the existing and future residential uses in the City by providing needed self-storage.
Policy 7. The City of Paramount will continue to maintain and conserve its existing residential neighborhoods.	**Consistent.** The Project would help support the existing and future residential uses in the City by providing needed self-storage without displacing residential uses.

Table XI-1
Project Consistency with the General Plan

Applicable Polices	Project Consistency
Policy 13. The City of Paramount will continue to provide safe, convenient pedestrian linkages across and along streets containing commercial centers and uses.	**Consistent.** The Project would include a new sidewalk across the Minnesota Avenue frontage for pedestrian use and access to/from off-site pedestrian facilities, including transit. Also, the Project would include bicycle parking.
Policy 14. The City of Paramount will encourage the continued revitalization of its industrial districts to accommodate economic development and growth.	**Consistent.** The Project includes replacement of worn, aging buildings with a self-storage facility, which would reflect contemporary architecture, design, and building standards. Additionally, the Project would be required to undergo Design Review by the City to ensure the Project complies with the City's design requirements. Additionally, the Project would help support the existing and future residential uses in the City by providing needed self-storage.
Policy 22. The City of Paramount will continue to promote quality design in the review of residential, commercial and industrial development.	**Consistent.** The Project includes replacement of worn, aging buildings with a self-storage facility, which would reflect contemporary architecture, design, and building standards. Additionally, the Project would be required to undergo Design Review by the City to ensure the Project complies with the City's design requirements.
Policy 23. The City of Paramount will continue to employ a design theme in the review of future commercial development and in the rehabilitation of existing commercial uses.	**Consistent.** The Project includes replacement of worn, aging buildings with a self-storage facility, which would reflect contemporary architecture, design, and building standards. Additionally, the Project would be required to undergo Design Review by the City to ensure the Project complies with the City's design requirements.
Transportation Element	
Policy 5. The City of Paramount will strive to ensure that new development implements its "fair-share" of improvements to offset the potential adverse impacts associated with the additional traffic that will be generated by the new development.	**Consistent.** The applicable Development Fees identified on the City of Paramount's Fee Schedule will be paid prior to building permit issuance.
Policy 7. The City of Paramount will design and locate increased off-street	**Consistent.** The Project would provide on-site parking for employees and customers.

Table XI-1
Project Consistency with the General Plan

Applicable Polices	Project Consistency
parking in commercial areas to reduce conflicts with arterial traffic and improve viability of commercial districts.	
Policy 10. The City of Paramount will encourage new and existing businesses to include those improvements that will promote the use of alternative forms of transit.	**Consistent.** The Project would include a new sidewalk across the Minnesota Avenue frontage for pedestrian utility and access to/from offsite pedestrian facilities, including transit. Also, the Project would include bicycle parking to facilitate cycling in-lieu of single-occupancy-vehicles.
Health and Safety Element	
Policy 2. The City of Paramount will work to identify and improve existing buildings that do not meet fire or earthquake standards.	**Consistent.** The Project includes replacement of worn, aging buildings with a self-storage facility, which would be designed and construction to meet current Fire and Building Code standards.
Policy 3. The City of Paramount will identify areas of high risk (high densities, older structures, fire hazards) so that disaster response may be prioritized.	**Consistent.** The Project includes replacement of worn, aging buildings with a self-storage facility, which would be designed and construction to meet current Fire and Building Code standards.
Policy 12. The City of Paramount will require special soils and structural investigations for all larger structures or development involving large groups of people pursuant to State requirements.	**Consistent.** As discussed in response to Checklist Topic VII (Geology and Soils), a Due Diligence Geotechnical Evaluation has been prepared for the Project. The Project would be designed and constructed to meet current Building Code standards.
Policy 14. The City of Paramount will continue redevelopment efforts, particularly in older commercial and industrial areas.	**Consistent.** The Project includes replacement of worn, aging buildings with a self-storage facility, which would be designed and construction to meet current Fire and Building Code standards.
Policy 15. The City of Paramount will strive to protect life and property from fire damage.	**Consistent.** The Project includes replacement of worn, aging buildings with a self-storage facility, which would be designed and construction to meet current Fire and Building Code standards.
Policy 19. The City of Paramount will require contemporary fire protection for multi-story structures and larger industrial facilities.	**Consistent.** The Project includes replacement of worn, aging buildings with a self-storage facility, which would be designed and construction to meet current Fire and Building Code standards.

Table XI-1
Project Consistency with the General Plan

Applicable Polices	Project Consistency
Policy 20. The City of Paramount will require all development to comply with established fire safety standards.	**Consistent.** The Project includes replacement of worn, aging buildings with a self-storage facility, which would be designed and construction to meet current Fire and Building Code standards.
Policy 21. The City of Paramount will require new development to install sprinkler systems and smoke detectors, as appropriate.	**Consistent.** The Project includes replacement of worn, aging buildings with a self-storage facility, which would be designed and construction to meet current Fire and Building Code standards and would include a fire-suppression sprinkler system and smoke alarms.
Policy 34. The City of Paramount will promote the development of a compatible noise environment throughout the City.	**Consistent.** As discussed in response to Checklist Topic XIII (Noise), the Project would not result in any significant noise impacts.
Policy 49. Decrease the urban heat island effect, especially in areas with populations most vulnerable to heat.	**Consistent.** The Project would be required to use roofing material that minimizes the heat island effect, in accordance with the City's Green Building Standards Code.
Economic Development Element	
Policy 1. The City of Paramount will continue to promote commercial development that improves the image of the City for residents and businesses alike.	**Consistent.** The Project includes replacement of worn, aging buildings with a self-storage facility, which would reflect contemporary architecture, design, and building standards. Additionally, the Project would be required to undergo Design Review by the City to ensure the Project complies with the City's design requirements.
Policy 13. The City of Paramount will promote quality design as a means to ensure compatibility among commercial, industrial, and residential uses.	**Consistent.** The Project includes replacement of worn, aging buildings with a self-storage facility, which would reflect contemporary architecture, design, and building standards. Additionally, the Project would be required to undergo Design Review by the City to ensure the Project complies with the City's design requirements.
Public Facilities Element	
Policy 7. The City of Paramount will continue to implement its recycling and waste reduction programs as a means to comply with the AB 939 requirements.	**Consistent.** The Project would comply with the City's recycling program.

Table XI-1
Project Consistency with the General Plan

Applicable Polices	Project Consistency
Environmental Justice	
Policy EJ-1.1: Truck Idling Restrictions. Designate acceptable and unacceptable areas for freight trucking and diesel truck idling to limit impacts on residential neighborhoods overburdened by air pollution. Require businesses to install signs prohibiting idling. Promote contact information of regulatory agency for reporting violations.	**Consistent.** The Project would install signs in the parking and loading/unloading areas prohibiting vehicle idling. Project employees would enforce the rule.
Policy EJ-1.2: Industrial Pollution. Reduce pollution exposure in residential neighborhoods by limiting industrial operations that generate potentially hazardous air pollutants.	**Consistent.** Because the Project is not an industrial use, the Project would not generate potentially hazardous air pollutants associated with industrial operations.
Policy EJ-3.6: Proper Hazardous Materials Management. Promote the proper collection, handling, recycling, reuse, treatment, and long-term disposal of hazardous waste from households, businesses, and government operations.	**Consistent.** The Project would comply with all regulatory requirements for the use and disposal of hazardous waste.
Policy EJ-5.2: Tree Canopy. Expand the tree canopy and improve the urban forest in areas without a lot of trees to promote healthier communities and expand shade opportunities along sidewalks and parking areas.	**Consistent.** The Project would include landscaping in accordance with the City's requirements.
Policy EJ-5.3: Urban Greening. Encourage urban greening and green infrastructure elements to increase groundwater recharge, reduce urban runoff, improve water quality, and create public green spaces.	**Consistent.** The Project would include landscaping and in accordance with the City's requirements. Additionally, the Project would be required to comply with the City's LID requirements, which could improve water quality associated with urban runoff from the Project Site when compared to the existing condition.
Source: City of Paramount General Plan.	

Zoning Code

The Project Site is currently zoned M-2. The Project includes a request for discretionary approval of a zone change of the Project Site to Planned Development with Performance Standards (PD-PS). The purpose the PD-PS zone is to ensure a fuller realization of the City's General Plan than that which would result from the application of the current site zoning regulations. It is intended to be applied only to areas under single or unified ownership or control that are sufficiently large to allow for overall planning and design in detail so as to secure to the community and the future occupants and developer values and amenities greater than those likely to be achieved by the relatively inflexible provisions necessary to regulate the successive development of individual lots by numerous different owners. It is the intent of this zone classification to encourage development of superior design and quality through creative application of the City's zoning criteria and through the creation of performance standards applied to specific development and recorded as conditions and covenants against the land.

The zone change is required to allow the self-storage use on the Project Site, because the City's municipal code does not explicitly allow such a use by-right or with a conditional use permit. The Project would comply with all standards established as part of the PD-PS zone. For these reasons, the Project would be substantially consistent with the zoning code.

Cumulative Impacts

As discussed previously, the Project would not result in any inconsistencies with any of the applicable plans, policies, or regulations associated with development of the Project Site. The City would assess the consistency of the related projects with all applicable plans, policies, and regulations associated with those projects, individually. Regardless of any potential inconsistencies the related projects may result in, because the Project would not result in any inconsistencies, the Project would not have the potential to contribute to any cumulative inconsistency impacts.

Mitigation Measures

No significant impacts related to land use and planning have been identified, and no mitigation measures are required.

XII. MINERAL RESOURCES

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

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

No Impact. The Project Site is located in an urbanized part of the City and is developed with industrial manufacturing uses. The Project Site is not in area that contains aggregate resources.[38] Thus, the Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. Therefore, no impacts related to this issue would occur.

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

No Impact. The Project Site is located in an urbanized part of the City. The Project Site is not identified as a mineral resource recovery site.[39] Thus, the Project would not 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. Therefore, no impacts related to issue would occur.

Cumulative Impacts

As discussed previously, the Project would not result in any impacts related to mineral resources. Regardless to what degree the related projects could result in impacts related to mineral resources, because the Project would not result in any impacts related to

[38] *Updated Designation of Regionally Significant Aggregate Resources in the San Gabriel Valley Production-Consumption Region, Los Angeles County, State Mining and Geology Board, April 2014.*

[39] *Ibid.*

mineral resources, the Project would not have the potential to contribute to any cumulative impacts.

Mitigation Measures

No significant impacts related to mineral resources have been identified, and no mitigation measures are required.

XIII. NOISE

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

The analysis below is based primarily based on the following (refer to Appendix G):

- *Noise and Vibration Modeling Results, DKA Planning, June 2022.*

Characteristics of Sound

Sound is technically described in terms of the loudness (amplitude) and frequency (pitch) of the sound. The standard unit of measurement for sound is the decibel (dB). The human ear is not equally sensitive to sound at all frequencies. The "A-weighted scale," abbreviated dBA, reflects the normal hearing sensitivity range of the human ear. On this scale, the range of human hearing extends from approximately 3 to 140 dBA. Table XIII-1 provides examples of A-weighted noise levels from common sources.

Table XIII-1
A-Weighted Decibel Scale

Typical A-Weighted Sound Levels	Sound Level (dBA L_{eq})
Near Jet Engine	130
Rock and Roll Band	110
Jet flyover at 1,000 feet	100
Power Motor	90
Food Blender	80
Living Room Music	70
Human Voice at 3 feet	60
Residential Air Conditioner at 50 feet	50
Bird Calls	40
Quiet Living Room	30
Average Whisper	20
Rustling Leaves	10
Source: Cowan, James P., Handbook of Environmental Acoustics, 1993. *These noise levels are approximations intended for general reference and informational use.*	

Noise Definitions

Noise Definitions. This noise analysis discusses sound levels in terms of equivalent noise level (L_{eq}), maximum noise level (L_{max}), and the Community Noise Equivalent Level (CNEL).

- Equivalent Noise Level (L_{eq}): L_{eq} represents the average noise level on an energy basis for a specific time period. Average noise level is based on the energy content (acoustic energy) of sound. For example, the L_{eq} for one hour is the energy average noise level during that hour. L_{eq} can be thought of as a continuous noise level of a certain period equivalent in energy content to a fluctuating noise level of that same period.

- Maximum Noise Level (L_{max}): L_{max} represents the maximum instantaneous noise level measured during a given time period.

Community Noise Equivalent Level (CNEL): CNEL is an adjusted noise measurement scale of average sound level during a 24-hour period. Due to increased noise sensitivities during the evening and night hours, human reaction to sound between 7:00 P.M. and 10:00 P.M. is as if it were actually 5 dBA higher than had it occurred between 7:00 A.M. and 7:00 P.M. From 10:00 P.M. to 7:00 A.M., humans perceive sound as if it were 10 dBA higher. To account for these sensitivities, CNEL figures are obtained by adding an additional 5 dBA to evening noise levels between 7:00 P.M. and 10:00 P.M. and 10 dBA to nighttime noise levels between 10:00 P.M. and 7:00 A.M. As such, 24-hour CNEL figures are always higher than their corresponding actual 24-hour averages.

Effects of Noise. The degree to which noise can impact an environment ranges from levels that interfere with speech and sleep to levels that can cause adverse health effects. Most human response to noise is subjective. Factors that influence individual responses include the intensity, frequency, and pattern of noise; the amount of background noise present; and the nature of work or human activity exposed to intruding noise. According to the National Institute of Health (NIH), extended or repeated exposure to sounds at or above 85 dB can cause hearing loss. Sounds of 70 dBA or less, even after continuous exposure, are unlikely to cause hearing loss.[40] The World Health Organization (WHO) reports that adults should not be exposed to sudden "impulse" noise events of 140 dB or greater. For children, this limit is 120 dB.[41]

Exposure to elevated nighttime noise levels can disrupt sleep, leading to increased levels of fatigue and decreased work or school performance. For the preservation of healthy sleeping environments, the WHO recommends that continuous interior noise levels not exceed 30 dBA and that individual noise events of 45 dBA or higher be avoided.[42] Assuming a conservative exterior to interior sound reduction of 15 dBA, continuous exterior noise levels should therefore not exceed 45 dBA. Individual exterior events of 60 dBA or higher should also be limited. Some epidemiological studies have shown a weak association between long-term exposure to noise levels of 65 to 70 dBA and cardiovascular effects, including ischemic heart disease and hypertension. However, at this time, the relationship is largely inconclusive.

People with normal hearing sensitivity can recognize small changes in sound levels of approximately 3 dBA. Changes of at least 5 dBA can be readily noticeable while sound level increases of 10 dBA or greater are perceived as a doubling in loudness.[43] However, during daytime, few people are highly annoyed by noise levels below 55 dBA L_{eq}.[44]

Noise Attenuation. Noise levels decrease as the distance from noise sources to receivers increases. For each doubling of distance, noise from stationary sources can decrease by about 6 dBA over hard surfaces (e.g., reflective surfaces such as parking lots) and 7.5 dBA over soft surfaces (e.g., absorptive surfaces such as soft dirt and grass). For example, if a point source produces a noise level of 89 dBA at a reference distance of 50 feet over an asphalt surface, its noise level would be approximately 83 dBA at a distance of 100 feet, 77 dBA at 200 feet, etc. Noises generated by mobile sources such as roadways decrease by about 3 dBA over hard surfaces and 4.5 dBA over soft surfaces for each doubling of distance. It should be noted that because decibels are logarithmic units, they cannot be added or subtracted. For example, two cars each producing 60 dBA of noise would not produce a combined 120 dBA.

40 *National Institute of Health, National Institute on Deafness and Other Communication, www.nidcd.nih.gov/health/noise-induced-hearing-loss.*

41 *World Health Organization, Guidelines for Community Noise, 1999.*

42 Ibid.

43 *Federal Transit Administration, Transit Noise and Vibration Impact Assessment, 2018.*

44 *World Health Organization, Guidelines for Community Noise, 1999.*

Noise is most audible when traveling by direct line of sight, an unobstructed visual path between noise source and receptor. Barriers that break the line of sight between sources and receivers, such as walls and buildings, can greatly reduce source noise levels by allowing noise to reach receivers by diffraction only. As a result, sound barriers can generally reduce noise levels by up to 15 dBA.[45] The effectiveness of barriers can be greatly reduced when they are not high or long enough to completely break the line of sight from sources to receivers.

Regulatory Setting

Noise

There are no federal noise standards that directly regulate environmental noise related to the construction or operation of the Project, which is a private development in the City. With regard to noise exposure and workers, the Office of Safety and Health Administration (OSHA) regulations safeguard the hearing of workers exposed to occupational noise.

Federal. No federal noise standards regulate environmental noise associated with short-term construction activities or long-term operations of development projects. As such, temporary and long-term noise impacts produced by the Project would be largely regulated or evaluated by State and City standards designed to protect public well-being and health.

State. The State's 2017 General Plan Guidelines establish county and city standards for acceptable exterior noise levels based on land use. These standards are incorporated into land use planning processes to prevent or reduce noise and land use incompatibilities. Table XIII-2 illustrates State compatibility considerations between land uses and exterior noise levels.

California Government Code Section 65302 also requires each county and city to prepare and adopt a comprehensive long-range general plan for its physical development. Section 65302(f) requires a noise element to be included in the general plan. This noise element must identify and appraise noise problems in the community, recognize Office of Noise Control guidelines, and analyze and quantify current and projected noise levels.

45 *California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013.*

Table XIII-2
Community Noise Exposure (CNEL)

Land Use	Normally Acceptable[a]	Conditionally Acceptable[b]	Normally Unacceptable[c]	Clearly Unacceptable[d]
Single-family, Duplex, Mobile Homes	50 - 60	55 - 70	70 - 75	above 75
Multi-Family Homes	50 - 65	60 - 70	70 - 75	above 75
Schools, Libraries, Churches, Hospitals, Nursing Homes	50 - 70	60 - 70	70 - 80	above 80
Transient Lodging – Motels, Hotels	50 - 65	60 - 70	70 - 80	above 75
Auditoriums, Concert Halls, Amphitheaters	---	50 - 70	---	above 70
Sports Arena, Outdoor Spectator Sports	---	50 - 75	---	above 75
Playgrounds, Neighborhood Parks	50 - 70	---	67 - 75	above 75
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50 - 75	---	70 - 80	above 80
Office Buildings, Business and Professional Commercial	50 - 70	67 - 77	above 75	---
Industrial, Manufacturing, Utilities, Agriculture	50 - 75	70 - 80	above 75	---

[a] Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.
[b] Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.
[c] Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.
[d] Clearly Unacceptable: New construction or development should generally not be undertaken.

Source: Office of Planning and Research, State of California Genera Plan Guidelines, October 2003 (in coordination with the California Department of Health Services); City of Los Angeles, General Plan Noise Element, adopted February 1999.

The State has also established noise insulation standards for new multi-family residential units, hotels, and motels that are subject to relatively high levels of noise from transportation. The noise insulation standards, collectively referred to as the California Noise Insulation Standards (Title 24, California Code of Regulations) set forth an interior standard of 45 dBA CNEL for habitable rooms. The standards require an acoustical analysis which indicates that dwelling units meet this interior standard where such units are proposed in areas subject to exterior noise levels greater than 60 dBA CNEL. Local

jurisdictions typically enforce the California Noise Insulation Standards through the building permit application process.

City of Paramount General Plan Health and Safety Element. The City of Paramount General Plan includes a Health and Safety Element that includes policies and standards to guide the control of noise to protect residents, workers, and visitors. Its primary goal is to regulate long-term noise impacts to preserve acceptable noise environments for all types of land uses. It includes programs applicable to construction projects that call for the protection of noise-sensitive uses and the use of best practices to minimize short-term noise impacts. However, the Health and Safety Element contains no quantitative or other thresholds of significance for evaluating a project's noise impacts. Instead, it adopts the State's guidance on noise and land use compatibility, shown in Table XIII-2, "to help guide determination of appropriate land use and mitigation measures vis-à-vis existing or anticipated ambient noise levels." The Element includes eight policies that address noise issues; however, most of them involve Citywide coordination on noise. However, Policy 34 does apply to the Proposed Project, calling to "[p]romote the development of a compatible noise environment throughout the City."

City of Paramount Municipal Code. The CPMC contains regulations that would regulate noise from the Project's temporary construction activities. Chapter 9.12 governs noise issues, including setting noise standards for all properties, as shown in Table 3.

Table XIII-3
City Noise Standards (dBA)

Noise Zone	Day (Maximum 6:00 A.M. to 10:00 P.M.)	Night (Maximum 10:00 P.M.to 6:00 A.M.)
Industrial and Commercial	82	77
R1 and R2	62	57
R3 and R4	67	62
Source: DKA Planning, 2022.		

Section 9.12.060(B)(1) limits noise from a variety of sources.

> *SEC.9.12.060(B) SOURCES OF NOISE*
>
> *The provisions of this chapter shall apply to, but shall not be limited to, the control, sue and operation of the following noise sources whose use, operation, work, employment or other action creates, maintains, permits or causes to be created or maintained, any excessive, unnecessary, unwanted or annoying noise, sound, cry or behavior which exceeds the noise standards as set forth in Section 9.12.040 unless specifically exempted.*

1. *Radios, televisions, musical instruments, drums or other percussion instruments, tape recorders, sound trucks or vehicles, whether mobile or stationary, public address systems, loudspeakers, bull horns, sound equipment or other devices or machines used for producing, reproduction or amplification of music, instructions, talks, speeches, addresses or lectures, or for attracting attention by persons selling merchandise, food or beverage or other similar purposes.*

3. *Air conditioning units, refrigeration equipment, fans, blowers, pumps, engines, turbines, compressors, generators, saws, grinders, motors or other similar devices, equipment or apparatus.*

4. *Construction equipment or work, including, but not limited to, the operation, use or employment of pile drivers, hammers, saws, steam shovels, pneumatic hammers, drills, derricks, steam or electric hoists, motorized mechanical equipment or other similar equipment.*

Section 9.12.060(B)(4) exempts construction, repair, or remodeling equipment from the noise limits provided a construction permit is issued by the Building Division and construction activities are not permitted between 8:00 P.M. and 7:00 A.M.

Existing Noise Conditions

Noise-Sensitive Receptors

The Project Site is located in an industrial area 460 feet west of the Union Pacific San Pedro subdivision railroad right-of-way. The sensitive receptors closest to the Project Site include, but may not necessarily limited to, the following representative sampling:

- Residence, 16201 Minnesota Avenue; 210 feet southwest of the Project Site
- Residence, 7544 Monroe Street; 260 feet southwest of the Project Site.
- Residences, 16117-16133 Garfield Avenue; 730 feet west of the Project Site.
- Residences, 15909-15911 Vermont Avenue; 610 feet east of the Project Site.

Existing Ambient Noise Levels

The Project Site is improved with 12,580 square feet of industrial/manufacturing uses. with relatively minor sources of on-site operational noise. These include ventilation units and mechanical equipment used to operate the manufacturing facility.

While there is no on-site parking for the existing development, there is minor noise from the 62 daily vehicle trips traveling to and from the Project Site.[46] That noise includes tire friction as vehicles navigate to and from on-street parking spaces, minor engine acceleration, doors slamming, and occasional car alarms. Most of these sources are instantaneous (e.g., car alarm chirp, door slam), while others may last a few seconds. Intermittent noise from solid waste management and collection activities is short in duration, as are occasional loading of goods.

The primary source of noise near the Project Site is vehicle traffic, as transportation noise is typically the main source of noise in urban environments, largely from the operation of vehicles with internal combustion engines and frictional contact with the ground and air.[47] This includes vehicle traffic on Alondra Boulevard, a four-lane arterial 300 feet to the north with posted speed limits of 40 miles per hour (mph). Occasional noise comes from locomotive traffic on the Union Pacific San Pedro subdivision railroad right-of-way 460 feet east of the Project Site.

In April 2022, DKA Planning took short-term noise measurements near the Project Site to determine the ambient noise conditions (refer to Figure XIII-1).[48] Measurements were compliant with the City's Municipal Code Section 9.12.050, which governs monitoring procedures. The noise measurement results are shown in Table XIII-4.

Groundborne Vibration

Fundamentals of Vibration

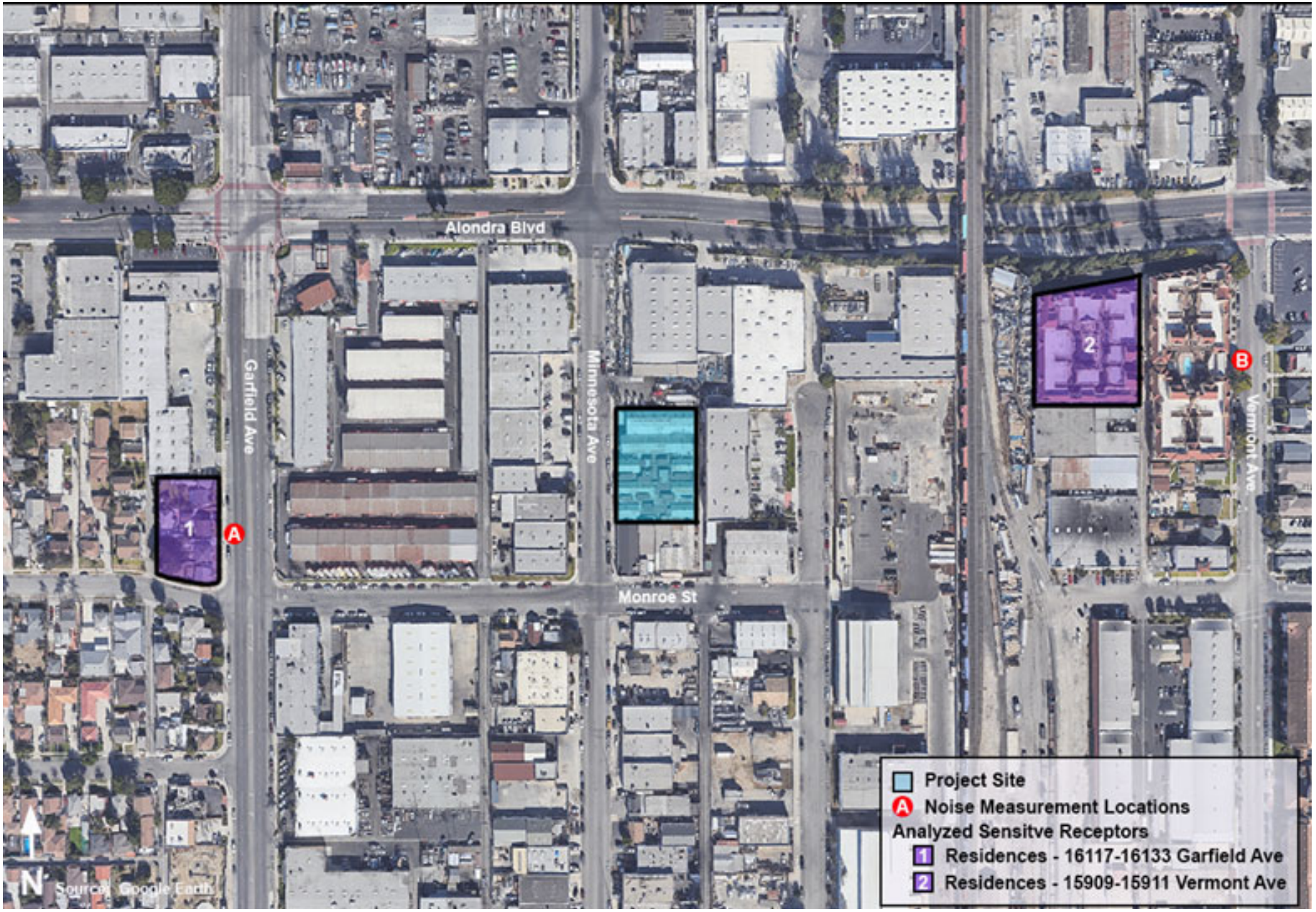
Characteristics of Vibration. Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, and acceleration. Unlike noise, vibration is not a common environmental problem, as it is unusual for vibration from vehicle sources to be perceptible. Common sources of vibration include trains, construction activities, and certain industrial operations.

Vibration Definitions. This analysis discusses vibration in terms of Peak Particle Velocity (PPV). PPV is commonly used to describe and quantify vibration impacts to buildings and other structures. PPV levels represent the maximum instantaneous peak of a vibration signal and are usually measured in inches per second.

46 *Linscott Law & Greenspan; Memorandum - Go Store It Paramount Project Transportation and Parking Assessment; June 2022.*

47 *World Health Organization, https://www.who.int/docstore/peh/noise/Comnoise-2.pdf accessed March 18, 2021.*

48 *Noise measurements were taken using a Quest Technologies Sound Examiner SE-400 Meter. The Sound Examiner meter complies with the American National Standards Institute (ANSI) and International Electrotechnical Commission (IEC) for general environmental measurement instrumentation. The meter was equipped with an omni-directional microphone, calibrated before the day's measurements, and set at approximately five feet above the ground.*



Source: Douglas Kim + Associates, LLC, 2022.

Figure XIII-1
Noise Measurement Locations

Effects of Vibration. High levels of vibration may cause physical personal injury or damage to buildings. However, groundborne vibration levels rarely affect human health. Instead, most people consider groundborne vibration to be an annoyance that can disrupt concentration or disturb sleep. Groundborne vibration can also interfere with certain types of highly sensitive equipment and machines, especially imaging devices used in medical laboratories.

Table XIII-4
Existing Measured Noise Levels

Noise Measurement Locations	Primary Noise Source	Sound Levels		Nearest Sensitive Receptor(s)	Noise/Land Use Compatibility[b]
		dBA (L_{eq})	dBA (CNEL)[a]		
A. 16133 Garfield Avenue	Traffic on Garfield Ave.	70.9	68.9	Residences – 16117-16133 Garfield Ave.	Conditionally Acceptable
B. 15911 Vermont Avenue	Traffic on Vermont Ave.	59.7	57.7	Residences – 15909-15911 Vermont Ave.	Normally Acceptable

[a] *Estimated based on short-term (15-minute) noise measurement using Federal Transit Administration procedures from 2018 Transit Noise and Vibration Impact Assessment Manual, Appendix E, Option 4.*

[b] *Pursuant to California Office of Planning and Research "General Plan Guidelines, Noise Element Guidelines, 2017. When noise measurements apply to two or more land use categories, the more noise-sensitive land use category is used. See Table 2 above for definition of compatibility designations.*

Source: DKA Planning, 2022.

Perceptible Vibration Changes. Unlike noise, groundborne vibration is not an environmental issue that most people experience every day. Background vibration levels in residential areas are usually well below the threshold of perception for humans, approximately 0.01 inches per second. Perceptible indoor vibrations are most often caused by sources within buildings themselves, such as slamming doors or heavy footsteps. Common outdoor sources of groundborne vibration include construction equipment, trains, and traffic on rough or unpaved roads. Traffic vibration from smooth and well-maintained roads is typically not perceptible.

Regulatory Framework

Federal

Federal Transit Administration (FTA). In 2018, the FTA published the Transit Noise and Vibration Impact Assessment Manual to aid in the estimation and analysis of vibration impacts. Typically, potential building and structural damages are the foremost concern when evaluating the impacts of construction-related vibrations. Table XIII-5 summarizes

FTA's vibration guidelines for building and structural damage. While these are reference values for vibration levels at 25 feet of distance, this analysis uses logarithmic equations to determine whether building damage would occur regardless of actual distance between construction activity and nearby buildings.

Table XIII-5
FTA Vibration Damage-Potential Threshold Criteria

Structure and Condition	Threshold Criteria (in/sec PPV) at 25 Feet
I. Reinforced-concrete, steel or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Non-engineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12
Source: Federal Transit Administration "Transit Noise and Vibration Impact Assessment Manual", September 2018.	

The FTA Assessment Manual also cites criteria for cases where more detailed analysis may be required. For buildings consisting of concrete wall and floor foundations, masonry or concrete walls, or stone masonry retaining walls, continuous vibrations of 0.3 inches per second PPV can be damaging. For buildings consisting of steel or reinforced concrete, such as factories, retaining walls, bridges, steel towers, open channels, underground chambers and tunnels with and without concrete alignment, continuous vibrations of 0.5 inches per second PPV can be damaging.

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

Less Than Significant Impact. The Project would generate noise during the construction and operational phase. Below is an analysis of the Project's noise levels and whether these levels would result in a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

Construction Noise

Construction Noise Threshold

Construction noise impacts could be considered significant if construction activities would exceed existing ambient exterior noise levels by 5 dBA (hourly L_{eq}) or more at a noise-sensitive use.

Construction Noise Analysis

On-Site Construction Activities

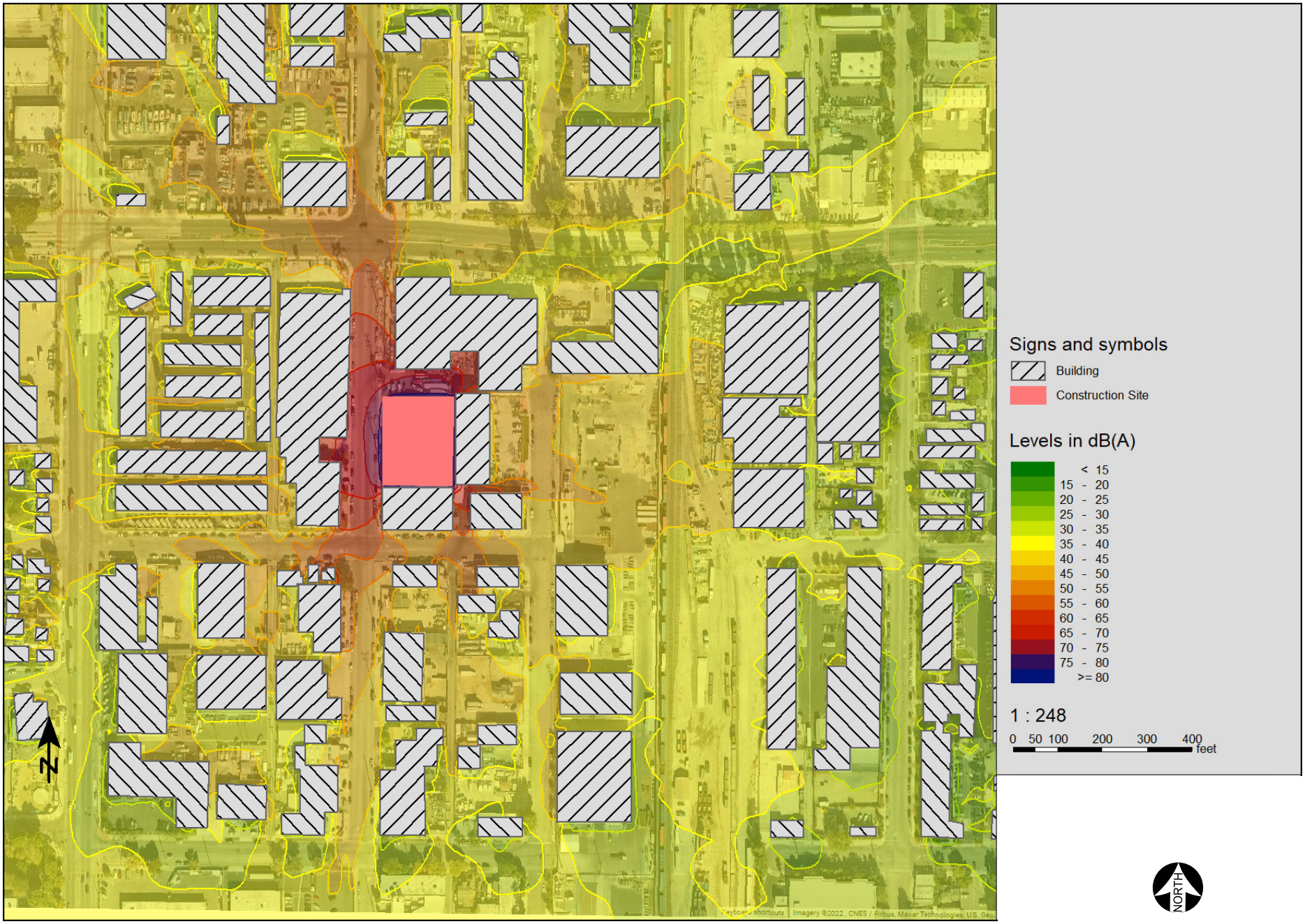
Construction would generate noise during the construction process that would span 15 months of demolition, grading, utilities trenching, building construction, paving, and application of architectural coatings, as shown in Table XIII-6. During all construction phases, noise-generating activities could occur at the Project Site between 7:00 A.M. and 8:00 P.M.

Table XIII-6
Construction Schedule Assumptions

Phase	Duration	Notes
Demolition	Month 1	Removal of 17,790 cubic yards of building floor area hauled 25 miles to landfill in 16-cubic yard capacity trucks.
Grading	Month 2 2 weeks)	Approximately 1,500 cubic yards of soil imported 25 miles in 16-cubic yard capacity trucks.
Trenching	Months 2-3 (6 weeks)	Trenching for utilities, including gas, water, electricity, and telecommunications.
Building Construction	Months 3-15	Footings and Foundation work (e.g., pouring concrete pads), framing, welding; installing mechanical, electrical, and plumbing. Floor assembly, interior painting, cabinetry and carpentry, elevator installations, low voltage systems, trash management.
Paving	Month 14 (2 weeks)	Flatwork, including paving of driveways and walkways
Architectural Coatings	Months 13-15	Application of interior and exterior coatings and sealants.

Source: DKA Planning, 2022.

Noise levels would generally peak during the demolition and grading phases, when diesel-fueled heavy-duty equipment like excavators and dozers are used to move large amounts of debris and dirt, respectively. This equipment is mobile in nature and does not always operate in a steady-state mode full load, but rather powers up and down depending on the duty cycle needed to conduct work. As such, equipment is occasionally idle during which time no noise is generated. During other phases of construction (e.g., trenching, building construction, paving, architectural coatings), noise impacts are generally lesser than during grading because they are less reliant on using heavy equipment with internal combustion engines. Smaller equipment such as forklifts, generators, various powered hand tools, and pneumatic equipment would generally be utilized. Off-site secondary noises would be generated by construction worker vehicles, vendor deliveries, and haul trucks. Figure XIII-2 illustrates how noise would propagate from the construction site during the demolition and grading phase.



Source: Douglas Kim + Associates, LLC, 2022.

Figure XIII-2
Construction Noise Contours

The Project's estimated construction noise levels are shown in Table XIII-7. These construction noise levels would not exceed the significance threshold of 5 dBA. Therefore, the Project's on-site construction noise impact would be less than significant.

Table XIII-7
Construction Noise Levels at Off-Site Sensitive Receptors

Receptor	Maximum Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Ambient Noise Level (dBA L_{eq})	Increase (dBA L_{eq})	Impact ?
Residence 16201 Minnesota Ave.	54.3	59.7	60.8	1.1	No
Residence 7544 Monroe St.	52.0	59.7	60.4	0.7	No
Residences 16117-16133 Garfield Ave.	42.3	70.9	70.9	0.0	No
Residences 15909-15911 Vermont Ave.	26.3	59.7	59.7	0.0	No
Source: DKA Planning, 2022.					

Off-Site Construction Activities

The Project would also generate noise at off-site locations from haul trucks moving debris from the Project Site during demolition activities; vendor and contractor trips; and worker commute trips. These activities would generate up to an estimated 91 peak hourly PCE vehicle trips, as summarized in Table XIII-8, during the building construction phase, assuming all workers travel to the worksite at the same time. This includes converting noise from heavy-duty truck trips to an equivalent number of passenger vehicle trips.

Typically, it would take a doubling of traffic volumes to result in a 3 dBA increase in roadway noise. The Project's 91 peak hourly PCE vehicle trips would not be enough to double traffic volumes on Alondra Boulevard, which carries hundreds of vehicle trips during peak traffic hours. Because the Project's construction-related trips would not cause a doubling in traffic volumes on Alondra Boulevard, which would be part of any haul route, the Project's construction-related traffic would not increase existing noise levels by 3 dBA or more. Therefore, the Project's noise impacts from construction-related traffic would be less than significant.

Table XIII-8
Construction Vehicle Trips (Maximum Hourly)

Construction Phase	Worker Trips[a]	Vendor Trips	Haul Trips	Total Trips
Demolition	10	0	27[b]	37
Grading	8	0	0	8
Trenching	5	0	0	5
Building Construction	44	47[c]	0	91
Paving	18	0	0	18
Architectural Coating	9	0	0	9

[a] *Assumes all worker trips occur in the peak hour of construction activity.*

[b] *The project would generate 54-haul trips over a 20-day period with seven-hour workdays. Because haul trucks emit more noise than passenger vehicles, a 19.1 passenger car equivalency (PCE) was used to convert haul truck trips to a passenger car equivalent, since haul trucks are larger than passenger cars.*

[c] *This phase would generate about 17 vendor truck trips daily over a seven-hour workday. Assumes a 19.1 PCE.*

Source: DKA Planning, 2022.

Operational Noise

Operational Noise Threshold

Operational noise impacts could be considered significant if the following would occur as a result of the Project:

- Project operations would cause ambient noise levels at off-site locations to increase by 3 dBA CNEL or more to or within "normally unacceptable" or "clearly unacceptable" noise/land use compatibility categories, as defined by the State's 2017 General Plan Guidelines.

- Project operations would cause any 5 dBA CNEL or greater noise increase.[49]

[49] *As a 3 dBA increase represents a slightly noticeable change in noise level, this threshold considers any increase in ambient noise levels to or within a land use's "normally unacceptable" or "clearly unacceptable" noise/land use compatibility categories to be significant so long as the noise level increase can be considered barely perceptible. In instances where the noise level increase would not necessarily result in "normally unacceptable" or "clearly unacceptable" noise/land use compatibility, a 5 dBA increase is still considered to be significant. Increases less than 3 dBA are unlikely to result in noticeably louder ambient noise conditions and would therefore be considered less than significant.*

Operational Noise Analysis

On-Site Operational Noise

During long-term operations, the Project would produce noise from both on- and off-site sources. As discussed below, the Project would not result in an exposure of persons to or a generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. The Project would also not increase surrounding noise levels by more than 5 dBA CNEL, the minimum threshold of significance based on the noise/land use category of sensitive receptors near the Project Site. As a result, the Project's on-site operational noise impacts would be less than significant.

Mechanical Equipment

The Project would operate mechanical equipment on the roof that would generate incremental long-term noise impacts. HVAC equipment in the form of large rooftop units suitable for cooling large volumes of a building would be located on the rooftop. This equipment would include a number of sound sources, including compressors, condenser fans, supply fans, return fans, and exhaust fans that could generate a sound pressure level of up to 81.9 dBA at one foot.[50]

However, noise impacts from rooftop mechanical equipment on nearby sensitive receptors would be negligible for several reasons. First, there would be no line of sight from these rooftop units to the sensitive receptors. The closest sensitive receptor is 610 feet away, and any line of sight for noise would be blocked by several intervening structures. Second, the presence of the Project's roof edge creates an effective noise barrier that further reduces noise levels from rooftop HVAC units by 8 dBA or more. A parapet would further shield sensitive receptors near the Project Site. These design elements would be helpful in managing noise, as equipment often operates continuously throughout the day and occasionally during the day, evenings, and weekends. As a result, noise from HVAC units would negligibly elevate ambient noise levels, far less than the 5 dBA CNEL threshold of significance for operational impacts. Other equipment would be fully enclosed within the building's structure and shielded from nearby sensitive receptors.

Vehicle-Related Activities

The majority of vehicle-related noise impacts at the Project Site would come from vehicles entering and exiting from Minnesota Avenue. Parking lot noise would include tire friction as vehicles navigate to and from parking spaces, doors slamming, car alarms, and minor engine acceleration. Most of these sources are

50 *City of Pomona, Pomona Ranch Plaza WalMart Expansion Project, Table 4.4-5; August 2014. Source was cluster of mechanical rooftop condensers including two Krack MXE-04 four-fan units and one MXE-02 two-fan unit. Reference noise level based on 30 minutes per hour of activity.*

instantaneous (e.g., car alarm chirp, door slam) while others may last a few seconds.

The low trip generation of the project (0 net A.M. peak hour trips, 8 net P.M. peak-hour trips) combined with the distant location of sensitive receptors over 610 feet away would result in no impacts from auto-related activities at the Project Site.[51]

Outdoor Uses

While most operations would be conducted inside the development, outdoor activities could generate noise that could impact local sensitive receptors. This would include trash collection, landscape maintenance, and commercial loading. These are discussed below.

- Trash collection. On-site trash and recyclable materials would be managed from the enclosed waste collection area in the parking lot. Haul trucks would access solid waste from Minnesota Avenue, where solid waste activities would include use of trash compactors and hydraulics associated with the refuse trucks themselves. Noise levels of approximately 71 dBA L_{eq} and 66 dBA L_{eq} could be generated by collection trucks and trash compactors, respectively, at 50 feet of distance.[52] Intermittent solid waste management activities would operate during the day. Trash collection activities would be similar to existing operations and would not substantially elevate ambient 24-hour noise levels at off-site locations by 5 dBA CNEL or more.

- Landscape maintenance. Noise from gas-powered leaf flowers, lawnmowers, and other landscape equipment can generate substantial bursts of noise during regular maintenance. For example, gas powered leaf blowers and other equipment with two-stroke engines can generated 100 dBA L_{eq} and cause nuisance or potential noise impacts for nearby receptors.[53] The landscape plan focuses on a modest palette of ground cover that will minimize the need for powered landscaping equipment, as some of this can be managed by hand. Any intermittent landscape equipment would operate during the day and would represent a negligible impact that would not increase 24-hour noise levels at off-site locations by 5 dBA CNEL or more.[54]

51 *Linscott Law & Greenspan; Memorandum - Go Store It Paramount Project Transportation and Parking Assessment; June 2022.*

52 *RK Engineering Group, Inc. Wal-Mart/Sam's Club reference noise level, 2003.*

53 *Erica Walker et al, Harvard School of Public Health; Characteristics of Lawn and Garden Equipment Sound; 2017.*

54 *While AB 1346 (Berman, 2021) bans the sale of new gas-powered leaf blowers by 2024, existing equipment can continue to operate indefinitely.*

- Commercial loading. On-site loading and unloading activities would be managed in the front of the parking lot, which is obscured from any off-site sensitive receptors, which are over 610 feet away. As a result, there would be negligible noise impacts on off-site receptors and impacts would not increase CNEL noise levels at off-site locations.

Based on an assessment of these on-site sources, the impact of on-site operational noise sources would be considered less than significant.

Off-Site Operational Noise

The majority of the Project's operational noise impacts would be off-site from vehicles traveling to and from the development. The Project could add up to eight net vehicle trips to the local roadway network on a peak weekday at the start of operations in 2024.[55]

Because it takes a doubling of traffic volumes (i.e., 100 percent) to increase ambient noise levels by 3 dBA L_{eq}, the Project's traffic would neither increase ambient noise levels 3 dBA or more into "normally unacceptable" or "clearly unacceptable" noise/land use compatibility categories, nor increase ambient noise levels 5 dBA or more. Twenty-four hour CNEL impacts would similarly be minimal, far below criterion for significant operational noise impacts, which begin at 3 dBA. As such, the Project's off-site operational noise impact would be less than significant.

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

Less Than Significant Impact. As discussed below, Project impacts related to groundborne vibration would be less than significant.

Construction

Construction equipment can produce groundborne vibration based on equipment and methods employed. While this spreads through the ground and diminishes in strength with distance, buildings on nearby soil can be affected. This ranges from no perceptible effects at the lowest levels, low rumbling sounds and perceptible vibration at moderate levels, and slight damage at the highest levels. Table XIII-9 summarizes vibratory levels for common construction equipment.

55 *Linscott Law & Greenspan; Memorandum - Go Store It Paramount Project Transportation and Parking Assessment; June 2022.*

Table XIII-9
Vibration Source Levels for Construction Equipment

Equipment	Approximate PPV at 25 feet (in/sec)
Pile Driver (impact)	0.644
Pile Drive (sonic)	0.170
Clam shovel drop (slurry wall)	0.202
Hydromill (slurry wall)	0.008
Vibratory Roller	0.210
Hoe Ram	0.089
Large Bulldozer	0.089
Caisson Drilling	0.089
Loaded Truck	0.076
Jackhammer	0.035
Small Bulldozer	0.003
Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018.	

Groundborne vibration would be generated by a number of construction activities at the Project site. As a result of equipment that could include on-site bulldozer operations or the vibrational equivalent, vibration velocities of up to 0.148 inches per second PPV are projected to occur at the industrial buildings to the east and south of the Project Site. This impact is below the 0.2 inches per second PPV threshold from FTA that is considered potentially harmful to Category III buildings. And as shown in Table XIII-10, more distant receptors (e.g., 7608 Alondra Boulevard) would experience even lower levels of groundborne vibration. Other potential construction activities would produce less vibration and have lesser potential impacts on nearby sensitive receptors. As a result, the Project's construction-related structural vibration impacts would be less than significant.

Operation

During Project operations, there would be no significant stationary sources of ground-borne vibration, such as heavy equipment or industrial operations. Operational ground-borne vibration in the Project Site's vicinity would be generated by the Project's vehicle travel on local roadways. Typical vehicles rarely create vibration levels perceptible to humans unless road surfaces are poorly maintained and have potholes or bumps. Roadways in the vicinity of the Project Site are regularly maintained by the City. Project-related traffic would generate groundborne vibration levels far below levels associated with building damage. Therefore, the Project's operational vibration impacts would be less than significant.

Table XIII-10
Vibration Levels

Off-Site Receptor Location	Distance to Project Site (feet)[a]	Vibration Velocity Levels at Off-Site Sensitive Receptors from Construction Equipment (in/sec PPV)					Significance Criterion (PPV)	Impact?
		Large Bulldozer	Caisson Drilling	Loaded Trucks	Jack-hammer	Small Bulldozer		
FTA Reference Vibration Level (25 Feet)	N/A	0.089	0.089	0.076	0.035	0.003	--	--
7605 Monroe St.	15	0.148	0.148	0.127	0.058	0.005	0.2[b]	No
15939 Illinois Ave.	15	0.148	0.148	0.127	0.058	0.005	0.2[b]	No
7608 Alondra Blvd.	75	0.030	0.030	0.025	0.012	0.001	0.2[b]	No

[a] *Includes ten-foot buffer for equipment maneuverability*
[b] *FTA criterion for Category III (non-engineered timber and masonry buildings)*

Source: DKA Planning, 2022.

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

No Impact. The Project Site is not located within an airport land use plan or within two miles of a public airport or public use airport. The closest airport is the Compton/Woodley Airport located approximately 4.2 miles west of the site. Therefore, the Project would not expose people residing or working in the Project Site area to excessive noise levels and no impact would occur.

Cumulative Impacts

None of the related projects shown in Appendix A are located in close proximity to the Project Site. The related project closest to the Project Site is Related Project #2, located approximately 0.3 miles northeast of the site. Distance and intervening development would attenuate noise between the related project and the Project Site, and cumulative construction and operational noise levels would not change the ambient noise level in the Project Site area. Therefore, cumulative noise impacts would be less than significant.

Mitigation Measures

No significant impacts related to noise have been identified, and no mitigation measures are required.

XIV. POPULATION AND HOUSING

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

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

No Impact. The Project includes infill development of the Project Site with a 104,630-square-foot self-storage facility, which would generate 2-3 jobs. The types of jobs that would be made available by the Project could be filled by people already living in the Project Site area and surrounding communities. The Project would not create such an increase in employment that would cause a substantial number of new people to move to the Project Site area and surrounding communities to fill the employment positions. Also, the Project does not include the development of housing and would be served by existing roadways and utility infrastructure. For these reasons, the Project would not induce substantial population growth. Therefore, no impacts related to unplanned growth would occur as a result of the Project.

b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. No housing is located on the Project Site. As such, the Project would not displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere, and no impacts related to this issue would occur. No mitigation measures are required.

Cumulative Impacts

Of the six related projects outlined in Appendix A, two include residential development – Related Project No. 5 includes development of a 40-unit eldercare facility, and Related Project No. 6 includes development of 10 single-family homes. The eldercare facility

would likely accommodate existing local residents. While development of the 10 single-family homes could add new residents to the City, assuming all the residents relocated from outside of the City, this potential increase in the number of residents in the City would not constitute substantial growth. The other related projects include development of commercial/industrial uses that would generate jobs that could be filled by existing people within the Project Site area. As discussed previously, the Project would not result in unplanned growth. Thus, the Project would not have the potential to contribute to any cumulative impacts related to unplanned growth. Therefore, cumulative impacts related to unplanned growth would be less than significant.

Mitigation Measures

No significant impacts related to population and housing were identified, and no mitigation measures are required.

XV. PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Fire protection?	☐	☐	☒	☐
b. Police protection?	☐	☐	☒	☐
c. Schools?	☐	☐	☒	☐
d. Parks?	☐	☐	☐	☒
e. Other public facilities?	☐	☐	☐	☒

a) Fire protection?

Less Than Significant Impact. The Los Angeles County Fire Department (LACFD) provides fire protection service for the City, which is served by two fire stations. Station 31, located at 7521 East Somerset Boulevard, has two fire engines and one paramedic squad. Station 57 is located at 5720 Gardendale Street in South Gate and has one fire engine. LACFD Station 31 is the nearest first response station to the Project Site.

The Project Site is currently developed with 12,850 square feet of industrial/manufacturing uses. The Project includes the demolition and removal of the existing buildings from the Project Site and the development of the site with a 104,630-square-foot self-storage building, inclusive of a 750-square-foot ancillary leasing office. The building would be five stories tall, reaching a maximum height of 57 feet. The building would be staffed from 8:00 AM to 6:30 PM with customer access available from 5:00 AM to 10:00 PM, seven days a week.

The Project would be required to comply with all fire protection and prevention requirements, including, but not limited to: inclusion of a fire suppression sprinkler system and smoke alarms, fire-rated walls, building setbacks, emergency access, and fire flow. The Applicant would be required to demonstrate sufficient fire flow. As a self-storage facility, the Project is a relatively low-density use that does not create a noticeable demand for fire protection services. The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, need for new or physically altered fire protection facilities, the construction of

which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services. Therefore, Project impacts related to fire protection services would be less than significant.

Cumulative Impacts

There are six related projects in the City (refer to Appendix A). Implementation of the related projects could result in a net increase in the number of residents and employees in the Project Site area and could increase the demand for fire protection services. Cumulative development requires the LACFD to continually evaluate the need for new or physically altered facilities in order to maintain adequate service ratios. Increased demands for additional LACFD staffing, equipment, and facilities would be funded via existing mechanisms (e.g., property taxes and government funding) to which the Project and related projects would contribute. Therefore, the cumulative impact to fire protection would be less than significant.

b) Police protection?

Less Than Significant Impact.

The Los Angeles County Sheriff's Department provides law enforcement services throughout the City. The City is served by the Lakewood Station at 5130 Clark Avenue in Lakewood and by a substation located near the intersection of Paramount and Somerset Boulevards in Paramount.

The Project Site is currently developed with 12,850 square feet of industrial/manufacturing uses. The Project includes the demolition and removal of the existing buildings from the Project Site and the development of the site with a 104,630-square-foot self-storage building, inclusive of a 750-square-foot ancillary leasing office. The building would be five stories tall, reaching a maximum height of 55 feet. The building would be staffed from 8:00 AM to 6:30 PM with customer access available from 5:00 AM to 10:00 PM, seven days a week. The Project would include the following security features:

- 24-hour/7-days-per-week CCTV surveillance of the exterior and interior of the building
- On-site staffing from 8:00 AM to 6:30 PM
- Full site fencing
- Security lighting
- Secured ingress/egress
- Facility access limited to staff and customers

The Los Angeles County Sheriff's Department would review the Project plans to ensure the Project adheres to the Department's requirements. The Project would not result in

substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services. Therefore, Project impacts on police protection services would be less than significant.

Cumulative Impacts

There are six related projects in the City (refer to Appendix A). Implementation of the related projects could result in a net increase in the number of residents and employees in the Project Site area and could increase the demand for police protection services. Cumulative development requires the Los Angeles County Sheriff's Department to continually evaluate the need for new or physically altered facilities in order to maintain adequate service ratios. Increased demands for additional Sheriff's Department staffing, equipment, and facilities would be funded via existing mechanisms (e.g., property taxes and government funding) to which the Project and related projects would contribute. Therefore, the cumulative impact on police protection would be less than significant.

c) Schools?

Less Than Significant Impact. The Project includes infill development of the Project Site with a 104,630-square-foot self-storage facility. The Project does not include the development of housing and would not generate a residential population with school-aged children. Additionally, the Project Applicant would be required to pay developer fees in accordance with the California Government Code to the Paramount Unified School District to mitigate any indirect impacts the Project could have on school services. Payment of developer fees constitutes full and complete mitigation for any direct and indirect impacts on school services as a result of new development. Therefore, Project impacts on school services would be less than significant.

Cumulative Impacts

There are six related projects in the City (refer to Appendix A). The related projects could result in an increase in the number of students in the Project Site area. However, similar to the Applicant of the Project, the applicants of all the related projects would be required to pay the state-mandated applicable developer fees to the school district to ensure that no significant impacts on school services would occur. Therefore, the cumulative impact on schools would not be significant.

d) Parks?

No Impact. The Project includes infill development of the Project Site with a 104,630-square-foot self-storage facility. The Project does not include the generation of any residential population that would increase the need for parks and recreational facilities.

As such, the Project would not create the need for new or altered parks and recreational facilities. Therefore, no impacts related to parks and recreational facilities would occur as a result of the Project.

Cumulative Impacts

There are six related projects in the City (refer to Appendix A). The related projects could result in an increase in the number of students in the Project Site area. The related projects could result in an increased demand for parks and recreational services. However, employees generated by the commercial projects would not typically enjoy long periods of time during the workday to visit parks and/or recreational facilities. Thus, these project-generated employees would not contribute to the future demand for park and recreational facility services. The applicant of the related residential project would be required to pay in-lieu park fees to the City, ensuring that any potential impacts to parks and recreational facilities would be less than significant. As stated previously, the Project would have no impacts related to parks. Therefore, the cumulative impact on parks would be less than significant.

e) Other public facilities?

No Impact. No other public facilities have been identified by the City.

Mitigation Measures

No significant impacts related to public services have been identified, and no mitigation measures are required.

XVI. RECREATION

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

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

No Impact. Refer to the response to Checklist Question XI(a)(iv) (Public Services – Parks). No mitigation measures are required.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

No Impact. Refer to the response to Checklist Question XV(a)(iv) (Public Services – Parks). No mitigation measures are required.

Cumulative Impacts

Refer to the response to Checklist Question XI(a)(iv) (Public Services – Parks).

Mitigation Measures

No significant impacts related to recreation have been identified, and no mitigation measures are required.

XVII. TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
d. Result in inadequate emergency access?	☐	☐	☒	☐

The analysis and information presented in this section is primarily based on the following (refer to Appendix H):

- *Go Store It Paramount Project – Transportation and Parking Assessment City of Paramount, California, Linscott, Law & Greenspan Engineers, June 3, 2022.*

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

Less than Significant Impact. The Project includes infill development of the Project Site with a 104,630-square-foot self-storage facility. The Project would be developed on a 0.74-acre site with frontage along the east side of Minnesota Avenue, south of Alondra Boulevard. The Project's trip generation is shown in Table XVII-1. As shown, the Project would generate a net increase of only 90 daily trips, no net increase in AM peak-hour trips, and a net increase of 8 PM peak-hour trips. In addition, the Project's implementation would not affect any transit stations, bicycle lanes, or pedestrian facilities (sidewalks and crosswalks). Additionally, as discussed in Table XI-1 under response to Checklist Question XI (b) (Land Use and Planning – Policy Consistency), the Project would be consistent with the applicable policies of the Transportation Element of the City's General Plan. Therefore, no impacts related to this issue would occur as a result of the Project.

Table XVII-1
Project Trip Generation and Comparison with VMT Screening Criteria

Land Use	Size	Daily Trip Ends Volumes	AM Peak-Hour Volumes			PM Peak-Hour Volumes		
			IN	OUT	TOTAL	IN	OUT	TOTAL
Project Use								
Mini-Warehouse	104,630 GSF	152	5	4	9	8	8	16
Less Existing Use								
Light Industrial	(12,580 GSF)	(62)	(8)	(1)	(9)	(1)	(7)	(8)
Total Net Project Trips		**90**	**(3)**	**3**	**0**	**7**	**1**	**8**

GSF = gross square feet

Source: LLG, 2022. Refer to Appendix H.

b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3?

Less Than Significant Impact. The State of California Governor's Office of Planning and Research (OPR) issued proposed updates to the CEQA guidelines in November 2017 and an accompanying technical advisory guidance was finalized in December 2018 (*Technical Advisory*) that amends the question related to transportation impacts in Appendix G of the CEQA Guidelines to delete reference to vehicle delay and level of service and instead refer to Section 15064.3, subdivision (b)(1) of the CEQA Guidelines asking if the project will result in a substantial increase in VMT. The California Natural Resources Agency certified and adopted the CEQA Guidelines in December 2018 and is now in effect. Accordingly, for the purpose of environmental review under CEQA, the City has established criteria for transportation impacts based on VMT for land use projects and plans that are generally consistent with the recommendations provided by OPR in the *Technical Advisory*.

Screening Criteria

Public agencies traditionally have set certain thresholds to determine whether a project requires detailed transportation analysis or if it could be assumed to have less-than-significant environmental impacts without additional study. Consistent with the OPR's *Technical Advisory*, the City has determined the following screening criteria for certain land development projects that may be presumed to result in a less-than-significant VMT impact:

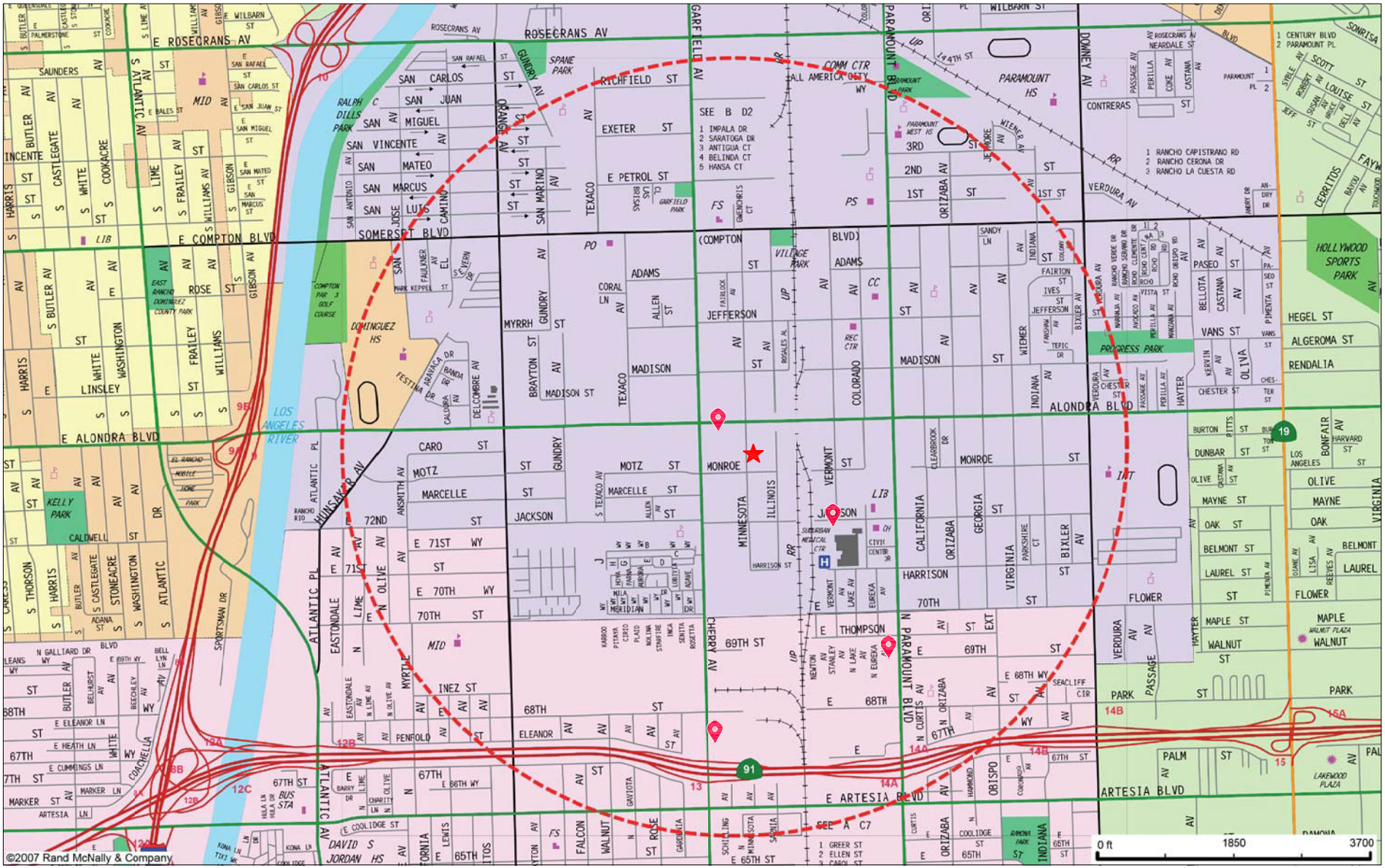
- Projects that result in a net increase of 110 or less daily vehicle trips

- Projects located in a High-Quality Transit Area (i.e., within half-mile distance of an existing rail transit station or located within half-mile of two or more existing bus routes with a frequency of service interval of 15 minutes or less during morning and evening peak hours)
- Project is locally serving retail (less than 50,000 square feet), including gas stations, banks, restaurants, shopping center.
- Local-serving community colleges, K-12 schools, local parks, daycare centers, etc.
- Residential projects with 100 percent affordable housing
- Community institutions project (public library, fire station, local government)
- Local-serving hotels (e.g., non-destination hotels)
- Local-serving assembly uses (places of worship, community organizations)
- Public parking garages and parking lots
- Assisted living or senior housing projects
- Affordable, supportive, or transitional housing projects

Proposed projects are not required to satisfy all of the screening criteria in order to screen out for further VMT analysis; satisfaction of one criterion is sufficient for screening purposes. For purposes of this analysis, the applicable screening criterion is whether the Project would generate a net increase of 110 daily vehicle trips or less.

As discussed previously and as summarized in Table XVII-1, the Project would generate less than 110 net new weekday daily trips.

Figure XVII-1 shows a map of existing self-storage facilities in the Project Site vicinity. As shown, four existing self-storage facilities exist within an approximate 1.0-mile radius from the Project Site. Two of the existing self-storage facilities are located in the City, and two are located further south in the City of Long Beach. The proposed self-storage facility would shorten trip lengths and would exhibit VMT characteristics similar to that of a local-serving retail use.



Source: Linscott Law & Greenspan, Engineers, 2022.

Figure XVII-1
Locations of Existing Self-Storage Facilities

Although the Project (i.e., with a total of 104,630 square feet of building floor area including approximately 75,334 square feet of rentable floor area) is more than 50,000 square feet, as representative of self-storage facilities, most of the space would be utilized as passive space for storage and as such, the Project would generate significantly fewer trips than 50,000 square feet of retail use. Thus, the Project would result in a less-than-significant VMT impact based on state guidance, because the Project would reduce VMT by shortening trip lengths, similar to local-serving retail developments and local-serving projects. Therefore, the Project satisfies the criteria to be considered a local-serving use and is screened out from further VMT analysis as it is presumed that the Project would cause less-than-significant transportation impacts. No further VMT analysis is required for the Project.

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

No Impact. The Project includes infill development of a site located in an urbanized portion of the City and is currently developed with industrial/manufacturing uses. The Project Site area includes a well-established network of roadways. The Project includes development of the Project Site with a self-storage facility and would not development of or changes to any roadways. Additionally, the self-storage use would be compatible with surrounding uses. Thus, the Project would not Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). Therefore, no impacts related to this issue would occur as a result of the Project.

d) Would the project result in inadequate emergency access?

Less Than Significant Impact. All ingress/egress associated with the Project would be designed and constructed in conformance to all applicable City and LACFD standards and requirements for design and construction. Therefore, Project impacts related to emergency access would be less than significant.

Cumulative Impacts

OPR's Technical Advisory on Evaluating Transportation Impacts in CEQA states the following regarding cumulative traffic impacts:

> *Cumulative Impacts. A project's cumulative impacts are based on an assessment of whether the "incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects." (Pub. Resources Code, § 21083, subd. (b)(2); see CEQA Guidelines, § 15064, subd. (h)(1).) When using an absolute VMT metric, i.e., total VMT (as recommended below for retail and transportation projects), analyzing the combined impacts for a cumulative impacts analysis may be appropriate. However, metrics such as VMT per capita or VMT*

per employee, i.e., metrics framed in terms of efficiency (as recommended below for use on residential and office projects), cannot be summed because they employ a denominator. A project that falls below an efficiency-based threshold that is aligned with long-term goals and relevant plans has no cumulative impact distinct from the project impact. Accordingly, a finding of a less-than-significant project impact would imply a less than significant cumulative impact, and vice versa. This is similar to the analysis typically conducted for greenhouse gas emissions, air quality impacts, and impacts that utilize plan compliance as a threshold of significance. (See Center for Biological Diversity v. Department of Fish & Wildlife (2015) 62 Cal.4th 204, 219, 223; CEQA Guidelines, § 15064, subd. (h)(3).)

As discussed above, the Project is screened out from further VMT analysis, as it is presumed the Project would cause less-than-significant transportation impacts. For this reason, the Project's cumulative contribution to traffic impacts would also be less than significant.

Mitigation Measures

No significant transportation impacts have been identified, and no mitigation measures are required.

XVIII. TRIBAL CULTURAL RESOURCES

.

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☒	☐	☐
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

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

Less Than Significant With Mitigation Incorporated. Refer to question "b" below.

b) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant

pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Less Than Significant With Mitigation Incorporated. A Sacred Lands File Search (SLFS) request was sent to the Native American Heritage Commission (NAHC) to determine if the Project Site is within the boundaries of any known sacred lands and/or whether any tribal cultural resources are known to exist on the Project Site. In response, the NAHC indicated that the results of the SLFS check conducted through the NAHC was negative.[56]

The City conducted Assembly Bill 52 (AB 52) consultation with the Gabrieleño Tongva Indians of California and suggested that although the SLF results were negative and the City has determined that there is no substantial evidence that the Project would result in a significant impact on tribal cultural resources, the Project would incorporate mitigation to address the potential for inadvertent discovery of previously unknown tribal cultural resources (refer to Mitigation Measure TCR-1), or human remains.[57]

Through compliance with Mitigation Measures TRC-1 and TRC-2, Project impacts related to tribal cultural resources would be less than significant.

Cumulative Impacts

Impacts related to tribal cultural resources tend to be site-specific and are assessed on a site-by-site basis. The City would require the applicants of each of the related projects to assess, determine, and mitigate any potential impacts related to tribal cultural resources that could occur as a result of development, as necessary. As discussed previously, with mitigation, the Project would not result in any significant impacts to tribal cultural resources. As such, the Project would not contribute to any potential cumulative impacts related to tribal cultural resources. Therefore, cumulative impacts related to cultural resources would be less than significant.

Mitigation Measures

To ensure that Project impacts related to tribal cultural resources would be less than significant, the following mitigation measures are required:

TCR-1 Prior to commencing excavating, clearing, grubbing, potholing, and grading activities ("Ground Disturbance Activities") at the Project Site, the Applicant shall retain a qualified tribal monitor that is qualified to monitor Ground Disturbance Activities to identify subsurface potential tribal cultural

---

56 *Native American Heritage Commission, Andre Green, correspondence, August 17, 2022. Refer to Appendix I.*

57 *City of Paramount, John King, correspondence, August 24, 2022. Refer to Appendix I.*

resources. Any qualified tribal monitor shall be approved by the Gabrielino Tongva Indians of California.

In the event that any subsurface objects or artifacts that may be tribal cultural resources are encountered during the course of any Ground Disturbance Activities, all such activities shall temporarily cease as set forth below:

1. Upon a discovery of a potential tribal cultural resource, the Applicant shall immediately stop all Ground Disturbance Activities area of discovery within a radius of 60 feet until the potential tribal cultural resource is properly assessed and addressed. Work shall be allowed to continue outside of the buffer area.

2. In consultation with the tribal monitor, if the City determines based on substantial evidence that pursuant to California Public Resources Code Section 21074(a)(2), the object or artifact appears to be a tribal cultural resource, the City shall provide any affected tribe a reasonable period of time, not less than three days, to conduct a site visit and make recommendations to the Applicant and the City regarding the treatment and disposition of any discovered tribal cultural resources.

3. In the event a tribal cultural resource that is significant under California Public Resources Code Section 21074(a)(2) is found, the City shall determine if that the tribe's recommendations at to treatment is reasonable and feasible. If so, the Applicant shall give good faith consideration to such recommended treatment of the tribal cultural resource.

4. If the Applicant does not accept a particular recommendation, the Applicant may request mediation by a mediator agreed to by the Applicant and the City. The mediator must have the requisite professional qualifications and experience to mediate such a dispute as determined by the City.

5. After making a reasonable effort to mediate a dispute, the City may require implementation of (1) the treatment as originally proposed; (2) a modified or substitute treatment that is at least as effective to mitigate a potentially significant impact; (3) no treatment if it is not necessary to mitigate a significant impact to tribal cultural resources.

6. The Applicant shall pay all costs and fees associated with the mediation.

7. The Applicant may recommence ground disturbance activities inside of the 60-foot radius after it has complied with all of the recommendations developed and approved as set forth in the above paragraphs.

TCR-2 If human remains are encountered during any activities associated with the Project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease. The Applicant shall notify the County Coroner (per§ 7050.5 of the California Health and Safety Code). The provisions of§ 7050.5 of the California Health and Safety Code, § 5097.98 of the California PRC, and AB 2641 will be implemented. If the Coroner determines the remains are Native American and not the result of a crime scene, the Coroner will notify the Native American Heritage Commission (NAHC), which then will designate a Native American Most Likely Descendant (MLD) (§ 5097.98 of the PRC). The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains.

XIX. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☐	☒
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

a) Would the project require or result in relocation or the construction of new or expanded water, wastewater treatment, or storm water drainage, electrical power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact. As discussed below, Project impacts related to these issues would be less than significant.

Water Facilities

Local water conveyance infrastructure in the vicinity of the Project Site is maintained and operated by the City. As shown in Table XIX-1, the Project would result in a net decrease

of 165 gallons of water per day when compared to the existing site use. It should be noted that this amount does not take into account the effectiveness of water conservation measures required in accordance with the City's Green Building Code, which would likely reduce the Project's water consumption (and wastewater generation) shown in Table XIX-1. Since the existing water conveyance facilities can accommodate existing demand, the facilities would be able to accommodate the Project's decreased demand. Therefore, Project impacts related to water facilities would be less than significant.

Table XIX-1
Estimated Project Water Consumption and Wastewater Generation[1]

Land Uses	Size	Water Consumption/ Wastewater Generation Rate[2]	Total (gpd)
Existing Uses to be Removed			
Industrial/Manufacturing	12,580 sf	25 gpd/1,000 sf	315
Proposed Land Uses			
Self-Storage (Office)[3]	750 sf	200 gpd/1,000 sf	150
		Less Existing	*(315)*
		Net Decrease	**-165**

gpd = gallons per day *sf = square feet*

1 *Assumes wastewater generation is equal to water consumption.*
2 *Source: Los Angeles County Department of Public Works. This rate does not assume the effectiveness of any current water conservation measures that are required in the City.*
3 *The "self-storage" portion of the Project would not have water or sewer utilities. Thus, the water consumption/wastewater generation for the Project is based on the "office" portion of the Project.*

Cumulative Impacts

There are six related projects in the City (refer to Appendix A). Implementation of the related projects could result in an increased cumulative demand for water conveyance infrastructure. Table XIX-2 shows that the cumulative development in the Project Site area could result in the consumption of 9,110 gallons of water per day (or 0.009 million gallons per day [mgd]). It should be noted that this amount does not take into account the net decrease in water consumption (and wastewater generation) that would occur as a result of removing existing uses or the effectiveness of water conservation measures required in accordance with the City's Green Building Code, both of which would likely substantially reduce the cumulative water consumption (and wastewater generation) shown on Table XIX-2.

Table XIX-2
Estimated Cumulative Water Consumption and Wastewater Generation[1]

Land Uses	Size	Water Consumption/ Wastewater Generation Rate[2]	Total (gpd)
Coffee Shop	57 seats[3]	25 gpd/seat	1,425
Fast Food Restaurant	70 seats[3]	30 gpd/seat	2,100
Market	5,863 sf	50 gpd/1,000 sf	293
Industrial	4,297 sf	25 gpd/1,000 sf	107
Senior Assisted Living	40 units	70 gpd/unit	2,800
Commercial	5,000 sf	50 gpd/1,000 sf	250
Single-Family Residential	10 homes	230 gpd/home	2,300
		Subtotal	***9,275***
		Plus Project	*(165)*
		Total	**9,110**

gpd = gallons per day *sf = square feet*

Note: Numbers might not add up due to rounding.

1 *Assumes wastewater generation equals water consumption.*
2 *Water consumption and wastewater generation rates for the City are not readily available. As such, rates developed by the City of Los Angeles for comparable land uses have been used. Source: City of Los Angeles Bureau of Sanitation, Sewer Generation Rates Factors, April 6, 2012. This rate does not assume the effectiveness of any current water conservation measures that are required in the City.*
3 *Assumes 30 square feet per seat.*

The applicants of the related projects would be subject to review by City to ensure that the existing infrastructure would be adequate to meet the water demand requirements for each project. All development in the City is subject to City requirements regarding potential infrastructure improvements need to meet respective water infrastructure needs. Additionally, all development in the City is required to comply with Fire Code requirements for fire flow and other fire protection requirements. Compliance with existing regulations would ensure that cumulative impacts related to water infrastructure would be less than significant. Also, as discussed previously, the Project would result in a net decrease in the demand for water conveyance infrastructure and thus, the Project would not have the potential to contribute to any cumulative impact on water conveyance infrastructure.

Wastewater Treatment

Less Than Significant Impact. The City is located within the service area of the Sanitation District 2 of the Los Angeles County Sanitary Districts (LACSD). Wastewater generated in the City is conveyed to the Los Coyotes Water Reclamation Plant (Los Coyotes WRP), which is operated by the LACSD. The Los Coyotes WRP is located at 16515 Piuma Avenue in the City of Cerritos and occupies 34 acres at the northwest junction of the San Gabriel River (I-605) and the Artesia (SR-91) Freeways. The Los

Coyotes WRP provides primary, secondary, and tertiary treatment for 37.5 million gallons of wastewater per day, with an average daily treatment of 27 to 32 million gallons of wastewater per day.[58]

As shown in Table XIX-1, the Project would result in a net reduction of 165 gallons of wastewater per day when compared to existing uses. Since wastewater generated by existing uses at the Project Site can be accommodated by Los Coyotes WRP's existing capacity, the Project's reduced wastewater generation would also be accommodated. Therefore, Project impacts related to wastewater treatment would be less than significant.

Cumulative Impacts

There are six related projects in the City (refer to Appendix A). Implementation of the related projects could result in an increased cumulative demand for wastewater treatment. Table XIX-2 shows that the cumulative development in the City could result in the generation of 9,110 gallons of wastewater per day (or 0.009 mgd). It should be noted that this amount does not take into account the net decrease in water consumption (and wastewater generation) that would occur as a result of removing existing uses or the effectiveness of water conservation measures required in accordance with the City's Green Building Code, both of which would likely substantially reduce the cumulative water consumption (and wastewater generation) shown on Table XIX-2. With an average daily treatment of 27 to 32 million gallons of wastewater per day, the Los Coyotes WRP has a daily remaining daily capacity of 9.5 to 5.5 mgd. Thus, the plant would have adequate capacity to accommodate cumulative wastewater treatment demand. No new or upgraded treatment facilities would be required. Therefore, the cumulative wastewater impacts related to water treatment would be less than significant. Also, as discussed previously, the Project would result in a net decrease in the demand for wastewater treatment and thus, the Project would not have the potential to contribute to any cumulative impact on wastewater treatment.

Storm Water Drainage

Less Than Significant Impact. As discussed in response to Checklist Question X(c)(iii) (Hydrology and Water Quality – Storm Drain Capacity), Project impacts related to storm drainage facilities would be less than significant.

Cumulative Impacts

Refer to the cumulative impact discussion provided in response to Checklist Topic X (Hydrology and Water Quality).

58 *Daniel Lomeli, Los Angeles County Sanitation Districts, July 26, 2022.*

Electrical Power

Less Than Significant Impact. As discussed in response to Checklist Questions VII(a) and (b) (Energy), Project impact related to electric power facilities would be less than significant.

Cumulative Impacts

Refer to the cumulative impact discussion provided in response to Checklist Topic VII (Energy).

Natural Gas

Less Than Significant Impact. As discussed in response to Checklist Questions VII(a) and (b) (Energy), Project impact related to natural gas facilities would be less than significant.

Cumulative Impacts

Refer to the cumulative impact discussion provided in response to Checklist Topic VII (Energy).

Telecommunications

Less Than Significant Impact. In the Project Site area, existing telephone service is typically provided by AT&T and T-Mobile, and existing cable television/internet is typically provided by AT&T and Spectrum. The Project Site could be served by existing telecommunications facilities that are available in the Project Site area. The Project would require Project- and site-specific infrastructure to connect to the existing utilities, but the Project would not require new or expanded facilities. Therefore, Project impacts related to telecommunications facilities would be less than significant.

Cumulative Impacts

There are six related projects in the City (refer to Appendix A). All of the related projects are located in a 0.5-mile radius of the Project Site and within an urbanized area of the City. All of the related projects represent infill development and are served by existing utilities, including telecommunications infrastructure. As with the Project, the related projects would likely require project- or site-specific infrastructure to connect to the existing infrastructure, but the related projects would not require new or expanded facilities. Therefore, cumulative impacts related to telecommunications infrastructure would be less than significant.

b) Would the project have significant water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Less Than Significant Impact. The City owns and operates a domestic water system that includes three wells; two imported water connections; approximately 130 miles of water transmission and distribution mains; and appurtenant valves, hydrants, and equipment. To supplement groundwater production, the City also purchases imported water from the Central Basin Municipal Water District (CBMWD), which in turn receives water through the Metropolitan Water District of Southern California (MWD). In addition to distributing potable water, the City also has a recycled water system.

The California Urban Water Management Planning Act of 1984 requires every municipal water supplier who serves more than 3,000 customers or provides more than 3,000 acre-feet per year (AFY) of water to prepare an Urban Water Management Plan (UWMP) every five years to identify short-term and long-term water resources management measures to meet growing water demands during normal, single-dry, and multiple-dry years. In the UWMP, the water supplier must describe the water supply projects and programs that may be undertaken to meet the total water use of the service area. The UWMP that is applicable to the Project is the City's 2020 UWMP.

The 2020 UWMP provides historical and forecasted water demands for the City. Total water demand varies annually and is contingent on various factors including population growth, weather, water conservation, drought, and economic activity. Table XIX-3 shows a breakdown of historical water demand for the City's service area. Tables XIX-4 through XIX-6 provide the City's projected water demand from 2025 to 2045 for normal year, single dry year, and multi dry-year events, respectively.

The City has developed a six-level rationing plan to be implemented when the City experiences a shortage in the water supply. According to the plan, the City Council, upon the request of the City Manager and General Manager, is given the authority to declare a stage of action and implement reduction measures. Table XIX-7 provides an outline of each phase and the associated percentage of water supply reduction.

Table XIX-3
Historic Water Use

Fiscal Year	Gross Water Use (MGY)	Population	Usage Per Capita Per Day (GPCD)
2001	2,346	55,929	116
2002	2,398	56,663	118
2003	2,464	57,210	121
2004	2,534	57,577	124
2005	2,198	57,723	108
2006	2,461	57,626	122
2007	2,434	57,601	122
2008	2,444	57,638	123
2009	2,365	57,874	120
2010	2,187	57,989	111
2011	2,214	54,191	112
2012	2,238	54,486	113
2013	2,217	54,722	111
2014	2,214	54,191	112
2015	2,084	55,302	103
2016	1,898	54,909	95
2017	2,082	54,909	104
2018	2,143	54,387	108
2019	1,769	53,955	90
2020	1,799	54,098	91

MGY = million gallons per year GPCD = gallons per capital per day

Source: City of Paramount 2020 UWMP.

Table XIX-4
Supply and Demand Comparison – Normal Year (Acre Feet)

	2025	2030	2035	2040
Supply Totals	7,876	7,902	7,902	7,902
Demand Totals	5,955	6,074	6,194	6,320
Difference	1,921	1,828	1,708	1,582

Source: City of Paramount 2020 UWMP.

Table XIX-5
Supply and Demand Comparison – Single Dry Year (Acre Feet)

	2025	2030	2035	2040
Supply Totals	7,955	7,981	7,981	7,981
Demand Totals	5,967	6,086	6,206	6,333
Difference	1,988	1,895	1,775	1,648
Source: City of Paramount 2020 UWMP.				

Table XIX-6
Supply and Demand Comparison – Multiple Dry Year Events (Acre Feet)

		2025	2030	2035	2040
Multiple dry year, first year supply	Supply Totals	7,955	7,981	7,981	7,981
	Demand Totals	5,967	6,086	6,206	6,333
	Difference	2,028	1,895	1,775	1,648
Multiple dry year, second year supply	Supply Totals	7,718	7,493	7,493	7,493
	Demand Totals	6,325	6,452	6,578	6,713
	Difference	1,393	1041	915	780
Multiple dry year, third year supply	Supply Totals	7,797	7,823	7,823	7,823
	Demand Totals	6,705	6,838	6,973	7,116
	Difference	1092	985	850	707
Multiple dry year, fourth year supply	Supply Totals	7,797	7,823	7,823	7,823
	Demand Totals	7,107	7,249	7,391	7,543
	Difference	690	574	432	280
Multiple dry year, fifth year supply	Supply Totals	7,797	7,823	7,823	7,823
	Demand Totals	7,533	7,683	7,835	7,995
	Difference	264	140	(-12)	(-172)
Source: City of Paramount 2020 UWMP.					

Table XIX-7
Stages of Water Shortage Contingency Planning

Shortage Level	Stage (Ord. 1050)	Percent Supply Reduction	Water Supply Condition
Level 1	Stage 1a: Moderate	0-10%	A Level I Water Supply Shortage exists when the City Council determines, in its sole discretion, that due to drought or other water supply conditions, a water supply shortage or threatened shortage exists and a 10% consumer demand reduction is necessary to make more efficient use of water and appropriately respond to existing water conditions.
Level 2	Stage 1b: Moderate	11-20%	A Level II Water Supply Shortage exists when the City Council determines, in its sole discretion, that due to drought or other water supply conditions, a water supply shortage or threatened shortage exists and a 20% consumer demand reduction is necessary to make more efficient use of water and appropriately respond to existing water conditions.
Level 3	Stage IIa: Severe	21-30%	A Level III Water Supply Shortage exists when the City Council declares, in its sole discretion, that due to drought or other water supply conditions, a water supply shortage or threatened shortage exists and a 30% consumer demand reduction is necessary to make more efficient use of water and appropriately respond to existing water conditions.
Level 4	Stage IIb: Severe	31-40%	A Level IV Water Supply Shortage exists when the City Council declares, in its sole discretion, that due to drought or other water supply conditions, a water supply shortage or threatened shortage exists and a

Table XIX-7
Stages of Water Shortage Contingency Planning

Shortage Level	Stage (Ord. 1050)	Percent Supply Reduction	Water Supply Condition
			40% consumer demand reduction is necessary to make more efficient use of water and appropriately respond to existing water conditions.
Level 5	Stage III: Critical	41-50%	A Level V Water Supply Shortage is referred to as a Water Shortage Emergency. A Level V condition exists when the City Council declares, in its sole discretion, a water shortage emergency and notifies its residents and businesses that a 50% reduction in consumer demand reduction is necessary to make more efficient use of water and appropriately respond to existing water conditions.
Level 6	Stage IV: Emergency	+51%	A Level V Water Supply Shortage is referred to as a Water Shortage Emergency. A Level V condition exists when the City Council declares, in its sole discretion, a water shortage emergency and notifies its residents and businesses that a 50% reduction in consumer demand is necessary to maintain sufficient water supplies for public health and safety, pursuant to Water Code Section 350 et seq.
Source: City of Paramount 2020 UWMP.			

As shown on Table XIX-1, the Project would result in a net reduction in water consumption at the Project Site when compared to existing site uses. Further, the Project Applicant would be required to comply with the water efficiency standards outlined in the City's Green Building Code to minimize water usage. As such, the Project would not require new or additional water supply or entitlements. Therefore, Project impacts on water supply would be less than significant.

Cumulative Impacts

There are six related projects in the City (refer to Appendix A). Implementation of the related projects could result in an increased cumulative demand for wastewater treatment. Table XIX-2 shows that the cumulative development in the City could result in the consumption of 9,160 gallons of water per day (or 0.009 mgd). It should be noted that this amount does not take into account the net decrease in water consumption that would occur as a result of removing existing uses or the effectiveness of water conservation measures required in accordance with the City's Green Building Code, both of which would likely substantially reduce the cumulative water consumption shown on Table XIX-2.

Through its 2020 UWMP, the City anticipates that its projected water supplies will meet demand through the year 2040. Applicants of development in the City are required to coordinate with the City to determine a project's anticipated water supply needs and the ability of the City to meet those needs. Additionally, all development in the City is required to incorporate water conservation measures outlined in the City's Green Building Code to minimize water consumption. Further all water users in the City are subject to water restrictions in times of drought.

Given that the City is completely built out, and the related projects are infill development that are replacing existing uses that currently consume water, it is likely that the City will have adequate water supply to accommodate the related projects, and cumulative impacts on water supply would be less than significant. Also, as discussed previously, the Project would result in a net decrease in the demand for water supply and thus, the Project would not have the potential to contribute to any cumulative impact on water supply.

c) Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. Refer to response to Checklist Question XIX(a) (Utilities and Service Systems – Wastewater Treatment).

Cumulative Impacts

Refer to the discussion of the cumulative impacts included in response to Checklist Question XIX(a) (Utilities and Service Systems – Wastewater Treatment).

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

Less Than Significant Impact. The landfills closest to the Project Site and the capacity of these landfills are shown in Table XIX-8. As shown, the landfills have an approximate available daily intake of 1,099 tons.

Table XIX-8
Landfill Capacity

Landfill Facility	Estimated Remaining Life (years)	Estimated Remaining Disposal Capacity (million tons)	Permitted Intake (tons/day)	Daily Disposal (tons/day)	Available Daily Intake (tons/day)
Burbank Landfill No. 3	110	2.3	240	125	115
Olinda Alpha	5	13	8,000	7,081	919
Whittier	35	4.2	350	285	65
				Total	**1,099**

Source: County of Los Angeles, Countywide Integrated Waste Management Plan, 2019 Annual Report, September 2020.

As shown in Table XIX-9, the Project would result in a net reduction in daily solid waste generation. The estimation of the Project's solid waste generation is conservative and does not account for the effectiveness of recycling efforts, which the Project would be required by the City to implement. The City requires residents to separate food scraps and other organic waste into a separate bin for recycling, as well as separation of other recyclables and landscaping remnants. With a remaining daily intake capacity of approximately 1,099 tons of solid waste per day, the landfills serving the City could accommodate the Project's daily solid waste generation. Therefore, no Project impacts related to solid waste would occur, and no mitigation measures are required.

Cumulative Impacts

There are six related projects in the City (refer to Appendix A). Implementation of the related projects could result in an increased cumulative demand for landfill capacity. Table XIX-10 shows that the cumulative development in the City could result in the generation of 0.10 tons of solid waste per day. It should be noted that this amount does not take into account the net decrease in solid waste generation that would occur as a result of removing existing uses or the effectiveness of the City's recycling program, both of which would likely substantially reduce the cumulative solid waste generation shown in Table XIX-10. With the remaining available capacity of 1,099 tons per day, landfill capacity would be adequate to accommodate the Project. Therefore, cumulative impacts related to solid waste would be less than significant. Also, as discussed previously, the Project would result in a net decrease in solid waste generation and thus, the Project would not have the potential to contribute to any cumulative impact related to solid waste.

Table XIX-9
Estimated Project Solid Waste Generation

Land Uses	Size	Solid Waste Generation Rate[1]	Total (tpd)
Previous Project Site Use			
Industrial/Manufacturing	12,850 sf	5 lbs/day/1,000 sf	0.032
Proposed Land Uses			
Self-Storage[2]	1,000 sf	6 lbs/day/1,000 sf	0.003
		Less Existing	*(0.032)*
		Net Decrease	**-0.029**

tpd = tons per day sf = square feet lbs = pounds

Note: Numbers might not add up due to rounding.

[1] http://www.calrecycle.ca.gov/wastechar/wastegenrates/
[2] The "self-storage" portion of the Project would not have trash facilities. Thus, the solid waste generation for the Project is based on the "office" portion of the Project.

Table XIX-10
Estimated Cumulative Solid Waste Generation

Land Uses	Size	Solid Waste Generation Rate[1]	Total (tpd)
Residential	50 du	4 lbs/day/du	0.10
Non-Residential	13,961 sf	5 lbs/day/1,000 sf	0.03
		Subtotal	***0.13***
		Plus Project	*(0.029)*
		Total	**0.10**

tpd = tons per day du = dwelling unit sf = square feet

Note: Numbers might not add up due to rounding.

[1] http://www.calrecycle.ca.gov/wastechar/wastegenrates/

e) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

No Impact. Refer to response to Checklist Question XIX(d) (Solid Waste Facilities and Regulations).

Cumulative Impacts

Refer to the cumulative impact analysis under response to Checklist Question XIX(d) (Solid Waste Facilities and Regulations).

Mitigation Measures

No significant impacts related to utilities and service systems have been identified, and no mitigation measures are required.

XX. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

a) Substantially impair an adopted emergency response plan or emergency evacuation plan??

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or uncontrolled spread of a wildfire?

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

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. Checklist Questions XX(a) through XX(d) do not apply to the Project, because the Project Site is not located near or within a state responsibility areas or lands classified as very high fire severity zones. No impacts related to this issue would occur as a result of the Project. No mitigation measures are required.

Cumulative Impacts

None of the related projects are located near or within a state responsibility areas or lands classified as very high fire severity zones. No cumulative impacts related to this issue would occur.

Mitigation Measures

No significant impacts related to wildfire have been identified, and no mitigation measures are required.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

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

a) Does the project have the potential to 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, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant With Mitigation Incorporated. For the reasons stated in this Initial Study, the Project would not have the potential to 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 reduce the number or restrict the range of a rare or endangered plant or animal. With implementation of Mitigation Measures ARCHEO-1, TCR-1, and TCR-2, the Project would not have the potential to eliminate important examples of the major periods of California history or prehistory.

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

Less Than Significant Impact. For the reasons stated in this Initial Study, the Project would not result in any significant impacts that would not have the potential to contribute to significant cumulative impacts. No mitigation measures are required.

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

Less Than Significant Impact. For the reasons stated in this Initial Study, the Project would not cause substantial adverse effects on human beings, either directly or indirectly. No mitigation measures are required.

INITIAL STUDY

5 PREPARERS AND PERSONS CONSULTED

Lead Agency

City of Paramount
16400 Colorado Avenue
Paramount, CA 90723

John King, Assistant Planning Director

Project Applicant

Madison Capital Group Management, LLC
Newport Center Drive, Suite 250
Newport Beach, CA 92660

Adam Lentz
Jennifer Rocci

Architect

MCG Architecture
15635 Alton Parkway, Suite 100
Irvine, CA 92618

CEQA Consultant

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

Chris Joseph, Owner/Principal
Kerrie Nicholson, Principal
Sherrie Cruz, Graphics Specialist

Air Quality, Greenhouse Gas Emissions, and Noise Consultant

DKA Associates
1513 W. Sepulveda Boulevard, Suite D
Torrance, CA 90501

Douglas Kim, Principal

Environmental Consultant

Salem Engineeing Group, Inc.
8711 Monroe Court, Suite A
Rancho Cucamonga, CA 91730

Richard McCondichie, EP, CAC

Geotechnical Consultant

Kling Consulting Group, Inc.
18008 Sky Park Circle, Suite 250
Irvine, CA 92614

Henry F. Kling, Principal Geotechnical Engineer
Jeffrey P. Blake, Associated Engineering Geologist

Traffic Consultant

Linscott, Law & Greenspan Engineers
600 S. Lake Avenue, Suite 500
Pasadena, CA 91106

Alfred C. Ying, P.E., PTP
Chin S. Taing, PTP, RSP1