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MEMORANDUM

DATE: December 18, 2023

TO: Clint Kleppe, Development Manager, Extra Space Storage

FROM: Ashley Davis, Principal

SUBJECT: Class 32 Categorical Exemption for the Proposed Gardena #1009 Self Storage Building Project in Torrance, California

LSA is pleased to submit this memorandum in support of a Class 32 Categorical Exemption (CE) for the proposed Gardena #1009 Self Storage Building Project (Project) in the city of Torrance, California.

PROJECT DESCRIPTION

Existing Project Site

As shown on **Figure 1**, Regional Location (all figures provided in **Attachment A**), the Project Site is located at 17575 South Western Avenue on the border of the cities of Torrance and Gardena. The Project Site is within the jurisdiction of the City of Torrance (City). The approximately 4-acre, 175,000 square-foot (sq ft) Project Site is located at the southwestern corner of the intersection of Artesia Boulevard and South Western Avenue ("Project Site"). The Project Site consists of Assessor's Parcel Number 4096-004-014. The existing Project Site includes approximately 82,722 sq ft of self-storage uses (nine one-story buildings with a total of 796 storage units), a 2,835 sq ft two-story office building, a surface parking lot, perimeter landscaping, and an Extra Space Storage facility sign. The Project Site is generally flat in elevation. In the Project Site's existing condition, vehicular access is provided via one full access driveway along South Western Avenue. There is one gated emergency access driveway, not intended for general use, on Artesia Boulevard.

The Project Site is surrounded by a mixture of residential and commercial uses. The Project Site is immediately bounded to the north by Artesia Boulevard, to the east by South Western Avenue and commercial uses, and to the southwest by the Dominguez Channel. Regional access to the Project Site is provided by Interstate (I) 405, located approximately 0.85 mile south of the Project Site and I-110, located approximately 1.4 miles east of the Project Site. Local access to the Project Site is provided by South Western Avenue and Artesia Boulevard.

Proposed Project

The Project would demolish the northwest portion (7,623 sq ft) of the self-storage building that borders Artesia Boulevard and the adjacent 8,445 sq ft self-storage building. All other existing uses on site, including the other self-storage buildings (approximately 66,654 sq ft in total), office building, and surface parking lot, would remain. The Project would construct a 58,734 sq ft self-storage building that includes two stories above ground plus a below-ground basement, and 10 new

parking stalls attached to the building. Under post-development conditions, the total square footage on the Project Site (including the existing 66,654 sq ft of self-storage uses and the 2,835 sq ft office to remain) will be 128,223 sq ft and include a total of 1,061 storage units ("Project").

Figure 2, Conceptual Site Plan, provides an overview of the site plan, including the location of the existing buildings to remain, the proposed building and parking stalls, vehicular access, the surface parking lot, landscaping, and an Extra Space Storage facility tower sign. Office hours of operation would remain the same: 9:30 a.m. to 6:00 p.m. Monday through Friday, 9:00 a.m. to 5:30 p.m. on Saturday, and closed on Sunday. Storage gate hours would also remain the same: 6:00 a.m. to 10:00 p.m. Monday through Sunday.

Zoning and General Plan Land Use Designations

According to the City's Zoning map, the Project Site is currently zoned for Limited Manufacturing (M-L). Per City Municipal Code Section 91.32.1, with approval of a Conditional Use Permit (CUP), operation of self-storage facilities is permitted on parcels zoned M-L. With approval of the CUP, the Project would be consistent with the City's zoning and the M-L zoning designation.

According to the City's General Plan, the Project Site has a current General Plan designation of General Commercial (C-GEN). Table A shows the Project's consistency with the General Plan. The Project involves development of commercial uses and would be consistent with the General Plan designation. Therefore, a General Plan Amendment (GPA) is not required for the Project.

Site Access and Parking

The Project would construct a new automatic lift gate at the emergency fire access driveway along Artesia Boulevard, which would be attached to the west side of the proposed building. The gate would remain for emergency access only. Vehicular access to the Project Site would continue to be provided via one existing driveway and automatic lift gate along South Western Avenue. The Project would include a total of 10 new parking stalls attached to the proposed self-storage building. The existing surface parking lot to remain includes 14 parking spaces, 2 of which are Americans with Disabilities Act (ADA) compliant. The Parking Analysis Memorandum (provided in **Attachment B**) concluded that, based on the application of empirical parking rates from the Institute of Transportation Engineers' *Parking Generation Manual,* Extra Space Storage facilities in the vicinity of the Project, and municipal code requirements of adjacent cities, the proposed 24-parking-space supply is within the range of demand expected for the Project and would provide adequate parking to accommodate the peak parking demand of the Project.

Building Design

The Project would include the development of an approximately 58,734 sq ft self-storage building, and 10 attached parking stalls. Under post-development conditions, the total square footage on site (including the existing 66,654 sq ft of self-storage uses and the 2,835 sq ft office to remain) will be 128,223 sq ft and will include a total of 1,061 storage units. The proposed building would consist of two stories above ground level reaching a maximum height of approximately 30 feet (ft), 11 inches, along with a subsurface basement level with a floor to floor height of 10 ft, 8 inches.

Infrastructure Improvements

As part of the project, new electricity, water, telephone, and sewer infrastructure would be constructed within the Project Site to connect the proposed building to the existing main lines. A 6-inch sewer line would be constructed to connect the proposed building to the existing 24-inch sewer line along Artesia Boulevard. Additionally, a 1-inch domestic water line and 6-inch fire water line would be constructed to connect the proposed building to the existing 8-inch water line along Artesia Boulevard. A storm drain line would also be constructed on the Project Site and connect to existing inlets bordering the proposed building.

Construction and Grading

Development of the Project would require demolition of the northwest portion (7,623 sq ft) of the self-storage building that borders Artesia Boulevard and the adjacent 8,445 sq ft self-storage building; excavation and grading of the site; delivery of materials; and construction of the building area and proposed parking stalls. Construction of the Project is anticipated to commence in the beginning of 2025 and occur for approximately 12 months with completion in expected early 2026. It is anticipated that an average of 8 to 10 construction workers would be on site each day.

Based on the preliminary grading plans, the Project would require a maximum excavation depth of 13 ft. resulting in approximately 8,040 cubic yards (cy) of cut and 390 cy of fill, resulting in a total of 7,650 cy to be exported off site. Demolition, grading, and building activities would involve the use of standard construction equipment such as scissor lifts, grading equipment, a water truck, a street sweeper, a large forklift, and standard trade trucks.

Discretionary Actions, Permits, and Other Approvals

In accordance with Sections 15050 and 15367 of the *State CEQA Guidelines*, the City is the designated Lead Agency for the Project and has principal authority and jurisdiction for California Environmental Quality Act (CEQA) actions and project approval. Responsible Agencies are those agencies that have jurisdiction or authority over one or more aspects associated with the development of a project and/or mitigation. Trustee Agencies are State agencies that have jurisdiction by law over natural resources affected by a Project.

The discretionary actions to be considered by the City as a part of the Project include:

- Modification to an existing Conditional Use Permit, pursuance to Code Section 92.28.1
- Conditional Use Permit Tier 2 (project over 15,000 square feet), pursuant to Code Section 95.3.31; and
- Find that the Project is exempt under CEQA pursuant to a Class 32 Categorical Exemption

CALIFORNIA ENVIRONMENTAL QUALITY ACT, SECTION 15332, CLASS 32 INFILL DEVELOPMENT EXEMPTION

Under *State CEQA Guidelines* Section 15332, a project, characterized as infill development, qualifies for a Class 32 CE under CEQA if the project: (1) is consistent with the general plan and zoning ordinance; (2) occurs within city limits on a Project Site of no more than 5 acres substantially

surrounded by urban uses; (3) is located on a site that does not have value as habitat for endangered, rare, or threatened species; (4) would not result in any significant impacts relating to traffic, noise, air quality, or water quality; and (5) is adequately served by all required utilities and services.

(1) The proposed project is consistent with the General Plan and Zoning Ordinance.

No amendments to an adopted planning document would be required for implementation of the Project. The City's General Plan land use designation for the Project Site is General Commercial (C-GEN). Table A shows the Project's consistency with the applicable City's General Plan policies. The zoning of the Project Site is Limited Manufacturing (M-L). Development of 15,000 sq ft or more of commercial space is allowed, subject to Tier 2 CUP approval within the M-L zoning designation. Therefore, the Project is consistent with the General Plan and zoning but would require a CUP (Tier 2) and modification to an existing CUP. As stated above, the Parking Analysis Memorandum (**Attachment B**) concluded, based on the application of empirical parking rates from the Institute of Transportation Engineers' (ITE) *Parking Generation Manual,* 5th Edition, and Extra Space Storage facilities in Southern California, that the proposed 24-parking-space supply is within the range of demand expected for the project and would be sufficient to accommodate the peak parking demand of the 128,571 sq ft of self-storage use. Therefore, the Project is consistent with the General Plan land use designation and zoning for the Project Site.

Table A: General Plan Consistency Analysis[1]

Policies	Consistency Analysis
Land Use Element	
Objective LU.2: A compatible land use pattern.	
Policy LU.2.1: Require that new development be visually and functionally compatible with existing residential neighborhoods and industrial and commercial areas.	**Consistent.** The existing use on site is commercial self-storage. The Project includes the development of a self-storage building and associated parking stalls, which is consistent and functionally compatible with existing buildings on site and the immediate area that consists of residential and commercial uses. Therefore, the Project would be consistent with **General Plan Policy LU.2.1.**
Objective LU.3: Planning decisions that recognize the unique characteristics, opportunities, and constraints of the City's diverse neighborhoods and districts while respecting private property rights.	
Policy LU.3.1: Require new development to be consistent in scale, mass, and character with structures in the surrounding area. For distinct neighborhoods and districts, consider developing design guidelines that suit their unique characteristics. Create guidelines that offer a wide spectrum of choices and that respect the right to develop within the context of existing regulations.	**Consistent.** The Project would develop a self-storage building on a site that currently is developed with self-storage uses, which would be consistent with the character of the surrounding area. The proposed 58,734 sq ft self-storage building would also be consistent with the scale of the other self-storage buildings on site and structures in the surrounding area. Land uses surrounding the Project Site include a mixture of residential and commercial uses. Therefore, the Project would be consistent with **General Plan Policy LU.3.1.**

Table A: General Plan Consistency Analysis[1]

Policies	Consistency Analysis
Policy LU.3.4: Continue to encourage the maintenance and upgrading of existing development.	**Consistent.** The Project would demolish the northwest portion (7,623 sq ft) of the self-storage building that borders Artesia Boulevard and the adjacent 8,445 sq ft self-storage building. A new self-storage building would be constructed in place of the demolished buildings and would provide an upgraded building and amenities. Additionally, the Project would include 10 new parking stalls to maintain parking supply. Therefore, the Project would be consistent with **General Plan Policy LU.3.4.**
Objective LU.4: Land use development that complements the circulation and infrastructure network, meets the circulation demand of residents and businesses, and provides opportunities for non-automobile circulation.	
Policy LU.4.4: Maintain parking requirements that adequately meet the needs of commercial and industrial land uses and protect adjacent residential neighborhoods from overflow parking encroachment.	**Consistent.** As discussed in the consistency analysis for Policy LU.3.4, the Project would include 10 new parking stalls attached to the proposed self-storage building. In addition, the existing 14 spaces on site would remain. The proposed parking supply would meet the demand of the commercial use on site **(Attachment B)**. Therefore, the Project would be consistent with **General Plan Policy LU.4.4.**
Objective LU.11: Attractive, high-quality neighborhoods and commercial and industrial districts through the use of innovative design and architectural themes.	
Policy LU.11.5: Require that commercial and industrial developments establish a high-quality visual environment through the use of design elements such as landscape, hardscape, signage, and lighting.	**Consistent.** The Project Site currently includes landscaping along Artesia Boulevard and South Western Avenue and an Extra Space Storage tower sign along Artesia Boulevard. Landscaping on the Project Site would remain the same and the Extra Space Storage tower sign would be replaced with a new tower sign on-site. Additionally, existing lighting would remain and continue to serve all buildings on the Project Site. The use of these design elements would ensure the development includes a high-quality visual environment, therefore, the Project would be consistent with **General Plan Policy LU.11.5.**
Circulation Element	
Objective CI.5: To meet the parking needs of businesses, residents, and visitors.	
Policy CI.5.1: Require new development to accommodate project-generated parking demand on site.	**Consistent.** The Project includes the development of a new self-storage building. As discussed in the consistency analysis for Policy LU.3.4, the Project would include 10 new parking stalls attached to the proposed self-storage building that, with the existing 14 spaces to remain, would adequately serve parking demand on site. Therefore, the Project would be consistent with **General Plan Policy CI.5.1.**
Objective CI.9: Infrastructure systems that support current and future development.	
Policy CI.9.1: Require that developers, prior to issuance of building permits, demonstrate that adequate infrastructure exists or will be provided to serve proposed development and not diminish services to existing uses.	**Consistent.** The Project includes the construction of new electricity, water, telephone, and sewer infrastructure to connect the proposed building to the existing main lines. The Project would not diminish services to existing uses. Therefore, the Project would be consistent with **General Plan Policy CI.9.1.**

[1] Policies not included in Table A were determined to not be applicable to the Project.
Source: Torrance General Plan (City of Torrance 2010).
City = City of Torrance
sq ft = square foot/feet

(2) The proposed project would occur within city limits on a project site of no more than 5 acres and would be substantially surrounded by urban uses.

The Project Site is approximately 4 acres and is located at 17575 South Western Avenue on the border of Torrance and Gardena. The Project Site is within the jurisdiction of the City of Torrance. In its existing condition, the Project Site contains self-storage facilities, paved parking areas, and perimeter landscaping. The Project Site is surrounded by existing urban uses, including industrial, commercial and residential uses. The Project Site is immediately bounded to the north by Artesia Boulevard, to the east by South Western Avenue and commercial uses, and to the southwest by the Dominguez Channel. Therefore, the Project occurs within City limits on a Project Site of no more than 5 acres and is substantially surrounded by urban uses.

(3) The proposed project would be located on a site that does not have value as habitat for endangered, rare, or threatened species.

As shown on **Figure 2**, the Project Site includes approximately 82,722 sq ft of existing self-storage uses (nine one-story buildings), a 2,835 sq ft two-story office building, a surface parking lot, landscaping, and an Extra Space Storage facility tower sign. The existing landscaped areas consisting of grass and ornamental shrubs are generally located along the northern and eastern perimeters of the Project Site. The site is surrounded on all sides by urban development.

No special-status species are expected to occur on the Project Site in the existing condition because of the lack of suitable habitat. Similarly, the Project would not substantially reduce locally common wildlife populations because no suitable habitat exists on site. The Project would not significantly affect sensitive biological resources given the amount of previous development that has occurred on the Project Site and in the vicinity. Project construction and operation would have no impacts either directly or through habitat modification to any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or the United States Fish and Wildlife Service (USFWS). Therefore, the Project Site does not have value as habitat for endangered, rare, or threatened species.

The Project, like all projects, would be subject to the provisions of the Migratory Bird Treaty Act (MBTA), which prohibits disturbing or destroying active nests, and California Fish and Game Code Section 3503, which protects nests and eggs. No on-site tree removal would be part of the Project. With compliance with existing regulations, potential impacts to nesting birds would be avoided.

(4) The proposed project would not result in any significant impacts relating to traffic, noise, air quality, or water quality.

Traffic. A Transportation Analysis Memorandum (LSA, June 2023) (**Attachment C**) was prepared to identify the trip generation impacts associated with the Project. The trip generation of the Project was calculated using trip rates from the ITE's *Trip Generation Manual*, 11th Edition (2021) for Mini-Warehouse (Land Use 151). Table B, below, summarizes the project trip generation.

Table B: Project Trip Generation

Land Use	Size (ksf)	Unit	ADT	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Trip Rates[1]									
Mini-Warehouse (Self Storage)[1]		TSF	1.45	0.06	0.04	0.10	0.08	0.09	0.17
Existing Trip Generation (To Be Demolished)									
Mini-Warehouse (Self Storage)[1]	16.068	TSF	23	1	1	2	1	1	3
Project Trip Generation (New Construction)									
Mini-Warehouse (Self Storage)[1]	58.734	TSF	85	4	2	6	5	6	10
Net Trip Generation (Project – Existing)									
Mini-Warehouse (Self Storage)[1]	**42.666**	**TSF**	**62**	**3**	**1**	**4**	**4**	**5**	**7**

[1] Trip rates referenced from the Institute of Transportation Engineers (ITE) *Trip Generation Manual,* 11th Edition (2021), Land Use 151 (Mini-Warehouse)

ADT = average daily traffic

TSF = thousand square feet

As shown in Table B, the anticipated net trip generation for the Project is estimated to be approximately 62 daily trips, with 4 trips in the morning peak hour and 7 trips in the evening peak hour.

Circulation Plans/Policies. The Project would not alter any transit, roadway, bicycle, or pedestrian facilities. Therefore, it would not conflict with any program, plan, ordinance, or policy addressing these components of the local circulation system.

Traffic Screening Criteria. The Project is located within 0.5 mile of a high-quality transit corridor at the intersection of South Western Avenue and 166th Street. According to the City's *Traffic Impact Assessment (TIA) Guidelines for Land Use Projects* (dated January 2021), transit-based screening cannot occur if the project has a floor area ratio (FAR) of less than 0.75.[1] The Project's net FAR will be 0.24 and, as a result, the screening criteria is not met.

According to the City of Torrance *Traffic Circulation Analysis (TCA) Guidelines* (July 1, 2020), the Project is exempt from a Level of Service (LOS) Based Traffic Circulation Analysis because it is not expected to generate 500 or more net new daily trips.[2] Similarly, according to the TIA Guidelines, because the Project would generate less than a net increase of 110 daily trips, it would be considered a small project and be presumed to have a less than significant impact. [3]

Operational Deficiencies/Emergency Access. The Project would construct a new automatic lift gate at the emergency fire access driveway along Artesia Boulevard, which would be attached to the west side of the proposed building. The gate would remain for emergency access only.

[1] City of Torrance. 2021. Traffic Impact Assessment Guidelines for Land Use Projects. Page 15. Website: https://www.torranceca.gov/home/showpublisheddocument/63027/637539099775370000 (accessed December 6, 2023).

[2] City of Torrance. 2020. Traffic Circulation Analysis (TCA) Guidelines. Website: https://www.torranceca.gov/our-city/public-works/civil-and-traffic-engineering/traffic-engineering/traffic-impact-analysis-guidelines (accessed December 6, 2023).

[3] City of Torrance. 2021. Traffic Impact Assessment Guidelines for Land Use Projects. Page 11. Website: https://www.torranceca.gov/home/showpublisheddocument/63027/637539099775370000 (accessed December 6, 2023).

Vehicular access to the Project Site would continue to be provided via one existing driveway and automatic lift gate along South Western Avenue. Therefore, the Project would not create operational deficiencies or interfere with emergency access. The Project meets the criteria for an LOS-Based TCA exemption and the criteria to be screened out from a detailed VMT analysis due to its classification as a small project. Therefore, the Project would have a less than significant impact on transportation.

Noise. The *Noise and Vibration Technical Memorandum* (Noise and Vibration Impact Analysis) (LSA 2023) prepared for the Project is provided in **Attachment D**.

Noise Standards

Construction Noise

Project construction would result in short-term noise and vibration. Maximum construction noise would be short-term, generally intermittent depending on the construction phase, and variable depending on receiver distance from the active construction zone. The duration of various types of construction noise and vibration would vary from 1 day to several weeks, depending on the phase of construction. The levels and types of impacts that may occur during construction are described below.

The first type of short-term construction noise would result from the transport of construction equipment and materials to the Project Site and construction worker commutes. These transportation activities would incrementally raise noise levels on access roads leading to the site. It is expected that larger trucks used in equipment delivery would generate higher noise impacts than vehicles associated with worker commutes. The single-event noise from equipment trucks passing at a distance of 50 ft from a sensitive noise receptor would reach a maximum level of 84 A-weighted decibels (dBA) maximum instantaneous noise level (L_{max}). However, the pieces of heavy equipment for construction activities would be moved on site just once and would remain on site for the duration of each construction phase. In addition to the equipment deliveries, the greatest construction traffic volume would occur during the grading phase when approximately 249 daily trips between hauling and worker trips would occur. These trips would not add any significant volume to the daily traffic noise in the project vicinity as 2005 ADTs on Artesia Boulevard and Western Avenue are 36,000 and 32,000, respectively. Because the total number of daily vehicle trips would be minimal when compared to existing traffic volumes on the affected streets, the noise level changes associated with these trips would be much less than 1 dBA and would not be perceptible. Therefore, equipment transport noise and construction-related worker commute impacts would be short term and would not result in a significant off-site noise impact. No mitigation is required.

The second type of short-term noise impact is related to noise generated during demolition, site preparation, grading, building construction, architectural coating, and paving on the Project Site. Construction is undertaken in discrete steps, each of which has its own mix of equipment and, consequently, its own noise characteristics. These various sequential phases would change the character of the noise generated on the Project Site. Therefore, the noise levels would vary as construction progresses. Despite the variety in the type and size of construction equipment, similarities in the dominant noise sources and patterns of operation allow construction-related

noise ranges to be categorized by work phase. Table C lists the maximum noise levels recommended for noise impact assessments for typical construction equipment based on a distance of 50 ft between the construction equipment and a noise receptor. Typical operating cycles for these types of construction equipment may involve 1–2 minutes of full-power operation followed by 3–4 minutes at lower power settings.

Table D shows the construction phases, the expected duration of each phase, the equipment expected to be used during each phase, the composite noise levels of the equipment at 50 ft, the distance of the nearest sensitive receptor from the average location of construction activities (a distance of 355 ft from the center of the Project Site), and noise levels expected during each phase of construction. While it is likely that architectural coating activities could overlap with building construction or paving, those combined activities would be less than construction noise levels generated during demolition. Conservatively, these noise level projections do not take into account intervening topography or barriers.

It is expected that average noise levels during construction at the nearest sensitive receptor, the mobile home park to the west, at 1914 Artesia Boulevard, would approach 70 dBA equivalent continuous noise level (L_{eq}) during the demolition phase, which would occur for a duration of approximately 20 days. Average noise levels during other construction phases would range from 57 dBA L_{eq} to 69 dBA L_{eq}. These predicted noise levels would only occur when all construction equipment is operating simultaneously; therefore, these noise levels are assumed to be conservative in nature because this would not occur.

Table C: Typical Construction Equipment Noise Levels

Equipment Description	Acoustical Usage Factor (%)	Maximum Noise Level (L_{max}) at 50 ft
Compressor	100	81
Concrete Mixer	40	85
Concrete Pump	40	85
Crane	16	83
Dozer	40	80
Forklift	20	75
Front [End] Loader	40	79
Generator	100	78
Grader	8	85
Scraper	40	88
Welder	40	74

Sources: *Noise from Construction Equipment and Operations, Building Equipment, and Home Appliances* (USEPA 1971); Roadway Construction Noise Model (FHWA 2006).
FHWA = Federal Highway Administration
ft = foot/feet
L_{max} = maximum instantaneous sound level
USEPA = United States Environmental Protection Agency

Table D: Construction Noise Levels by Phase

Phase	Duration (days)	Equipment	Composite Noise Level at 50 ft (dBA L_{eq})	Distance to Nearest Sensitive Receptor (ft)[1]	Noise Level at Receptor (dBA L_{eq})
Demolition	20	1 concrete/industrial saw, 1 dozer, and 3 tractors	88	355	70
Site Preparation	2	1 grader, 1 dozer, and 1 tractor	85	355	68
Grading	4	1 grader, 1 dozer, and 2 tractors	86	355	69
Building Construction	200	1 crane, 1 forklift, 1 generator set, 1 tractor, and 3 welders	83	355	66
Paving	10	1 cement and mortar mixer, 1 paver,1 piece of paving equipment, 1 roller, and 1 tractor	85	355	68
Architectural Coating	100	1 air compressor	74	355	57

Source: Compiled by LSA (2023).

[1] Distances are from the average location of construction activity for each phase, assumed to be the center of the Project Site. Residential uses to the west are 190 ft from the edge of construction activity.

dBA L_{eq} = average A-weighted hourly noise level

ft = foot/feet

Although the project construction-related short-term noise levels have the potential to be higher than the ambient noise in the project vicinity, construction noise would cease to occur once the project construction is completed, and therefore would not result in a noise increase in excess of standards established in the City's General Plan or noise ordinance. Furthermore, the construction-related noise levels would be below the 80 dBA L_{eq} criteria established by the Federal Transit Administration (FTA) for residential uses. The project would be constructed in compliance with the requirements of the City's Noise Ordinance, which states that construction activities shall only occur between the hours of 7:30 a.m. and 6:00 p.m., Monday through Friday, and between 9:00 a.m. and 5:00 p.m. on Saturdays. With incorporation of best business practices for noise reduction, the overall noise levels generated will be minimized, and construction noise impacts would be less than significant. No mitigation is required.

Operational Noise

According to the Transportation Analysis Memorandum prepared for the Project, the Project would result in a net increase of 62 average daily trips (ADT) based on the proposed increase in square footage (**Attachment C**). Based on the ADTs provided by the City of Torrance (*Daily Traffic Counts*[1]), the ADT along Artesia Boulevard and Western Avenue in the project vicinity is approximately 36,000 and 32,000, respectively based on projections for the year 2005. While the existing ADT is likely higher, using 36,000 and 32,000 ADT as the existing count would be a conservative approach as traffic volumes typically increase over time as population increases, typically referred to as ambient growth.

[1] City of Torrance. 2005. *Citywide Traffic Counts* – Existing (2005) Weekday Roadway Segment ADT.

The results of the calculations show that an increase of less than 0.01 dBA CNEL is expected along Artesia Boulevard and Western Avenue. A noise level increase of less than 3 dBA would not be perceptible to the human ear; therefore, the project would not generate a substantial permanent increase in ambient noise levels in excess of applicable standards and the impact would be less than significant.

The project would include rooftop heating, ventilation, and air conditioning (HVAC) units. The HVAC equipment could operate 24 hours per day. Rooftop HVAC equipment would generate sound power levels (SPL) of up to 87 dBA SPL or 72 dBA L_{eq} at 5 ft, based on manufacturer data (Trane[1]). Tables E and F show the results of the peak-hour daytime and off-peak-hour nighttime operational noise assessment. The results indicated that operational noise levels would be below the City of Torrance Municipal Code, Section 46.2.6 daytime and nighttime hourly noise level standards of 55 dBA L_{eq} and 50 dBA L_{eq}, respectively. Additionally, ambient noise levels would not increase by 5 dBA or more. Operations of the Project would be less than significant.

Table E: Peak Hour Daytime Exterior Noise Level Impacts

Receptor	Direction	Existing Quietest Daytime Noise Level (dBA L_{eq})	Project-Generated Noise Levels (dBA L_{eq})	Potential Operational Noise Impact?[1]	Exceeds Threshold?
Mobile Homes	West	65.6	52.0	No	No
Hotel	East	72.0	49.9	No	No

Source: Compiled by LSA (2023).

[1] A potential operational noise impact would occur if (1) the quietest existing daytime ambient hour is less than 55 dBA L_{eq} and project noise impacts are greater than 55 dBA L_{eq}, OR (2) the quietest daytime ambient hour is greater than 55 dBA L_{eq} and project noise impacts are 5 dBA greater than the quietest daytime ambient hour.

dBA = A-weighted decibels

L_{eq} = equivalent continuous noise level

[1] Trane. n.d. Fan Performance - *Product Specifications RT-PRC023AU-EN*.

Table F: Off-Peak Hour Nighttime Exterior Noise Level Impacts

Receptor	Direction	Existing Quietest Nighttime Noise Level (dBA L_{eq})	Project-Generated Noise Levels (dBA L_{eq})	Potential Operational Noise Impact?[1]	Exceeds Threshold?
Mobile Homes	West	57.7	46.7	No	No
Hotel	East	64.4	44.6	No	No

Source: Compiled by LSA (2023).

[1] A potential operational noise impact would occur if (1) the quietest nighttime ambient hour is less than 50 dBA L_{eq} and project noise impacts are greater than 50 dBA L_{eq}, OR (2) the quietest nighttime ambient hour is greater than 50 dBA L_{eq} and project noise impacts are 5 dBA greater than the quietest nighttime ambient hour.

dBA = A-weighted decibels

L_{eq} = equivalent continuous noise level

Groundborne Vibration

Construction Vibration

Vibration standards included in the FTA's *Transit Noise and Vibration Impact Assessment Manual* (2018) (FTA Manual)[1] are used in this analysis for ground-borne vibration impacts on human annoyance.

Ground-borne noise and vibration from construction activity would be low. The City's Municipal Code does not include specific criteria for assessing vibration impacts associated with damage to structures. Therefore, for the purpose of determining the significance of vibration impacts experienced at sensitive uses surrounding the Project Site, the guidelines within the 2018 FTA Manual have been used to determine vibration impacts. The FTA Manual (2018) guidelines show that a vibration level of up to 0.2 inch per second (in/sec) in peak particle velocity (PPV) is considered safe for buildings consisting of non-engineered timber and masonry and would not result in any construction vibration damage. Therefore, in order to be conservative, the 0.2 in/sec in the PPV threshold has been used when evaluating vibration impacts at the nearest structures to the site.

Table G provides reference PPV values and vibration levels (in terms of VdB) from typical construction vibration sources at 25 ft. While there is currently limited information regarding vibration source levels specific to the equipment that would be used for the project, to provide a comparison of vibration levels expected for a project of this size, a large bulldozer would generate 0.089 PPV (in/sec) of ground-borne vibration when measured at 25 ft, based on the FTA Manual.

[1] Federal Transit Administration. 2018. Transit Noise and Vibration Impact Assessment Manual. Website: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf (accessed December 6, 2023).

Table G: Vibration Source Amplitudes for Construction Equipment

Equipment	Reference PPV/L_V at 25 ft	
	PPV (in/sec)	L_V (VdB)[1]
Hoe Ram	0.089	87
Large Bulldozer	0.089	87
Caisson Drilling	0.089	87
Loaded Trucks	0.076	86
Jackhammer	0.035	79
Small Bulldozer	0.003	58

Source: *Transit Noise and Vibration Impact Assessment Manual* (FTA 2018).
[1] RMS VdB re 1 µin/sec.
µin/sec = micro-inches per second
ft = foot/feet
FTA = Federal Transit Administration
in/sec = inches per second
L_V = velocity in decibels
PPV = peak particle velocity
RMS = root-mean-square
VdB = vibration velocity in decibels

The distance to the nearest buildings for vibration impact analysis is measured between the nearest off-site buildings and the project construction boundary (assuming the construction equipment would only be used at or near the project setback line). The closest structure to the external construction activities is the convenience store associated with commercial uses to the southeast, which is within approximately 22 ft from the project's southeastern construction boundary. Using the reference data from Table E, it is expected that vibration levels generated by a large bulldozer and other large equipment within 22 ft of the project boundary would generate ground-borne vibration levels of 0.108 PPV (in/sec) or higher at the closest structures to the Project Site. This vibration level would not exceed the 0.2 in/sec PPV threshold considered safe for fragile buildings. All other buildings are farther away in distance and would experience lower vibration levels. Therefore, construction would not result in any vibration damage, and impacts would be less than significant.

Operational Vibration

Because the rubber tires and suspension systems of buses and other on-road vehicles provide vibration isolation and reduce noise, it is unusual for on-road vehicles to cause ground-borne noise or vibration. When on-road vehicles cause such effects as the rattling of windows, the source is almost always airborne noise. Most problems with on-road vehicle-related noise and vibration can be directly related to a pothole, bump, expansion joint, or other discontinuity in the road surface. Smoothing the bump or filling the pothole will usually solve the problem. The Project would have roads with smooth pavement and would not result in significant ground-borne noise or vibration impacts from vehicular traffic. Based on a desktop review, the adjacent roadways to the project site are paved and are not expected to exacerbate any vibration levels from passing trucks. Additionally, based on a reference vibration level of 0.076 in/sec PPV, structures more than 20 ft from the roadways that contain project trips would experience vibration levels below the most conservative standard of 0.12 in/sec PPV; therefore, vibration levels generated from project-related traffic on the adjacent roadways would be less than significant.

Airport/Airstrip/Airport Land Use Plan. The Project Site is approximately 3.5 miles southeast of the Hawthorne Municipal Airport and there are no helipads or private airstrips within 2 miles of the Project Site. Therefore, because the Project site is not within 2 miles of a public airport, the

Project would not expose people residing or working in the Project vicinity to excessive noise levels from aircraft noise.

Air Quality. The *Air Quality Technical Memorandum* (Air Quality Analysis) (LSA, October 2023) prepared for the Project is provided in **Attachment E**.

The Project Site is located in the South Coast Air Basin (Basin). Air quality in the Basin is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The California Emissions Estimator Model (CalEEMod) was used to calculate emissions from construction and operation of the Project.

Air Quality Plans. A consistency determination plays an essential role in local agency project review by linking local planning and unique individual projects to the air quality plans. A consistency determination fulfills the CEQA goal of fully informing local agency decision-makers of the environmental costs of the project under consideration at a stage early enough to ensure that air quality concerns are addressed. Only new or amended General Plan elements, Specific Plans, and significantly unique projects need to undergo a consistency review due to the air quality plan strategy being based on projections from local General Plans.

The City's General Plan is consistent with the SCAG Regional Comprehensive Plan Guidelines and the SCAQMD Air Quality Management Plan (AQMP). Pursuant to the methodology provided in the SCAQMD *CEQA Air Quality Handbook*, consistency with the Basin 2022 AQMP is affirmed when a project (1) would not increase the frequency or severity of an air quality standards violation or cause a new violation, and (2) is consistent with the growth assumptions in the AQMP. Consistency review is presented as follows:

1. The Project would result in short-term construction and long-term operational pollutant emissions that are all less than the CEQA significance emissions thresholds established by SCAQMD, as demonstrated below; therefore, the project would not result in an increase in the frequency or severity of an air quality standards violation or cause a new air quality standards violation.

2. The *CEQA Air Quality Handbook* indicates that consistency with AQMP growth assumptions must be analyzed for new or amended General Plan elements, Specific Plans, and significant projects. Significant projects include airports, electrical generating facilities, petroleum and gas refineries, designation of oil drilling districts, water ports, solid waste disposal sites, and offshore drilling facilities. The Project Site is currently zoned for Limited Manufacturing (M-L). Per City Municipal Code Section 91.32.1, with approval of a Conditional Use Permit (CUP) operation of self-storage facilities is permitted on parcels zoned M-L.

To determine the proposed Project's consistency with the 2022 AQMP, the project must be consistent with the AQMP growth assumptions, which are based, in part, on assumptions made by local planning agencies in the SCAG's Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) regarding population, housing, and growth trends. According to SCAG's 2020–2045 RTP/SCS, the City's population, households, and employment are forecast to increase by approximately 6,000 residents, 1,700 households, and 7,200 jobs, respectively,

between 2016 and 2045 and would total 153,000 residents, 57,300 households, and 133,800 jobs by 2045.[1] The proposed Project would include a 58,734 sq ft self-storage building, parking, and associated improvements. Based on information provided by the Project Applicant, the proposed Project would have approximately two employees, similar to existing employment conditions. It is anticipated that the additional two employees would fall within the 7,200 projected jobs for the City. Therefore, it is assumed that it the Project's labor demand would not substantially increase population, households, or employment. As such, the Project would be consistent with SCAG's growth assumptions for new job growth in the region as identified in the RTP/SCS.

Additionally, based on the proposed Project size (58,734 sq ft), the proposed Project is not considered a project of Statewide, regional, or areawide significance (e.g., large-scale projects such as airports, electrical generating facilities, petroleum and gas refineries, residential developments of more than 500 dwelling units, and shopping centers or business establishments employing more than 1,000 persons or encompassing more than 500,000 square feet of floor space) as defined in the California Code of Regulations (CCR) (Title 14, Division 6, Chapter 3, Article 13, Section 15206(b)). Because the proposed Project would not be defined as a regionally significant project under CEQA, it does not meet the SCAG Intergovernmental Review criteria.

Based on the consistency analysis presented above, the proposed Project would be consistent with the regional AQMP.

Criteria Pollutant Analysis. SCAQMD has established daily emissions thresholds for construction and operation of proposed projects in the Basin. The emission thresholds were established based on the attainment status of the Basin with regard to air quality standards for specific criteria pollutants. Because the concentration standards were set at a level that protects public health with an adequate margin of safety, these emission thresholds are regarded as conservative and would overstate an individual project's contribution to health risks. Table H lists the CEQA significance thresholds for construction and operational emissions established for the Basin.

Table H: Regional Thresholds for Construction and Operational Emissions

Emissions Source	Pollutant Emissions Threshold (lbs/day)					
	VOCs	NO_X	CO	PM_{10}	$PM_{2.5}$	SO_X
Construction	75	100	550	150	55	150
Operations	55	55	550	150	55	150

Source: SCAQMD Air Quality Significance Thresholds (April 2019).
CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
SCAQMD = South Coast Air Quality Management District
SO_X = sulfur oxides
VOCs = volatile organic compound

[1] Southern California Association of Governments (SCAG). 2020. Connect SoCal 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy. Website: https://scag.ca.gov/read-plan-adopted-final-connect-socal-2020 (accessed October 2023).

Projects in the Basin with construction- or operation-related emissions that exceed any of their respective emission thresholds would be considered significant under SCAQMD guidelines. These thresholds, which the SCAQMD developed and which apply throughout the Basin, apply as both project and cumulative thresholds. If a project exceeds these standards, it is considered to have a project-specific and a cumulative impact.

Additionally, the significance of localized project impacts under CEQA depends on whether ambient CO levels in the vicinity of the project are above or below State and federal CO standards. Because ambient CO levels are below the standards throughout the Basin, a project would be considered to have a significant CO impact if project emissions result in an exceedance of one or more of the 1-hour or 8-hour standards. The following are applicable local emission concentration standards for CO:

- California State 1-hour CO standard of 20 ppm
- California State 8-hour CO standard of 9 ppm

The following analysis assesses the potential Project-level air quality impacts associated with construction and operation of the proposed Project.

Construction Emissions

During construction, short-term degradation of air quality may occur due to the release of particulate matter emissions (i.e., fugitive dust) generated by demolition, grading, building construction, paving, and other activities. Emissions from construction equipment are also anticipated and would include carbon monoxide (CO), nitrogen oxides (NO_X), volatile organic compounds (VOCs), directly emitted particulate matter less than 2.5 microns or 10 microns in diameter ($PM_{2.5}$ or PM_{10}, respectively), and toxic air contaminants such as diesel exhaust particulate matter.

Project construction activities would include demolition, grading, site preparation, building construction, architectural coating, and paving activities. Construction-related effects on air quality from the Project would be greatest during the site preparation phase due to the disturbance of soils. If not properly controlled, these activities would temporarily generate particulate emissions. Unless properly controlled, vehicles leaving the site would deposit dirt and mud on local streets, which could be an additional source of airborne dust after it dries. PM_{10} emissions would vary from day to day, depending on the nature and magnitude of construction activity and local weather conditions. PM_{10} emissions would depend on soil moisture, silt content of soil, wind speed, and amount of operating equipment. Larger dust particles would settle near the source, whereas fine particles would be dispersed over greater distances from the construction site.

SCAQMD has established Rule 403: Fugitive Dust, which would require the applicant to implement measures that would reduce the amount of particulate matter generated during the construction period. Water or other soil stabilizers can be used to control dust, resulting in emissions reductions of 50 percent or more.

In addition to dust-related PM_{10} emissions, heavy trucks and construction equipment powered by gasoline and diesel engines would generate CO, sulfur oxides (SO_X), NO_X, VOCs, and some

soot particulate ($PM_{2.5}$ and PM_{10}) in exhaust emissions. If construction activities were to increase traffic congestion in the area, CO and other emissions from traffic would increase slightly while those vehicles idle in traffic. These emissions would be temporary in nature and limited to the immediate area surrounding the construction site.

CalEEMod was used to calculate emissions from on-site construction equipment and from worker and vehicle trips to the site. Construction of the proposed Project would begin in 2024 and would continue for approximately 12 months. The proposed Project would include 16,068 sq ft of demolition and would include the net export of 7,650 CY of soil, which was included in CalEEMod. This analysis assumes the use of Tier 2 construction equipment and that the proposed Project would comply with SCAQMD Rule 403 measures, which were also included in CalEEMod. All other construction details are not yet known; therefore, default assumptions (e.g., construction worker and truck trips and fleet activities) from CalEEMod were used. Construction emissions are summarized in Table I below.

Table I: Construction Emissions

Construction Phase	Maximum Daily Regional Pollutant Emissions (lbs/day)							
	VOCs	NO_X	CO	SO_X	Fugitive PM_{10}	Exhaust PM_{10}	Fugitive $PM_{2.5}$	Exhaust $PM_{2.5}$
Demolition	0.7	20.5	15.7	<0.1	1.1	0.7	0.2	0.6
Site Preparation	0.5	15.7	12.4	<0.1	2.5	0.4	1.2	0.4
Grading	0.9	40.8	23.0	0.1	7.4	0.8	2.6	0.7
Building Construction	0.6	13.9	12.5	<0.1	0.4	0.6	0.1	0.5
Paving	0.4	8.5	7.4	<0.1	0.2	0.4	<0.1	0.3
Architectural Coating	5.5	1.1	1.3	<0.1	0.1	0.1	<0.1	0.1
Peak Daily Emissions	**6.1**	**40.8**	**23.0**	**0.1**	**8.2**		**3.3**	
SCAQMD Threshold	**75.0**	**100.0**	**550.0**	**150.0**	**150.0**		**55.0**	
Significant?	**No**	**No**	**No**	**No**	**No**		**No**	

Source: Compiled by LSA (October 2023).
Note: Some values may not appear to add correctly due to rounding. Maximum emissions of VOCs occurred during the overlapping building construction and architectural coating phases.
CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in diameter
PM_{10} = particulate matter less than 10 microns in diameter
SCAQMD = South Coast Air Quality Management District
SO_X = sulfur oxides
VOCs = volatile organic compounds

As shown in Table I, construction emissions associated with the Project would not exceed the daily SCAQMD thresholds for VOCs, NO_X, CO, sulfur oxides (SO_X), $PM_{2.5}$, or PM_{10} emissions. Therefore, construction of the Project would not result in emissions that would result in a cumulatively considerable net increase of any criteria pollutant for which the project is in nonattainment under an applicable federal or State ambient air quality standard (AAQS).

Operational Emissions

Long-term air pollutant emissions associated with operation of the Project include emissions from area, energy, and mobile sources. Area-source emissions include architectural coatings, consumer products, and landscaping. Energy-source emissions result from activities in buildings that use natural gas. As discussed above, the proposed project would be all-electric and would not include any natural gas; therefore, the Project would not result in energy-source emissions.

Mobile-source emissions are from vehicle trips associated with operation of the Project. Area-source emissions consist of direct sources of air emissions at the Project Site, including architectural coatings, consumer products, and use of landscape maintenance equipment.

PM_{10} emissions result from running exhaust, tire and brake wear, and the entrainment of dust into the atmosphere from vehicles traveling on paved roadways. Entrainment of PM_{10} occurs when vehicle tires pulverize small rocks and pavement and the vehicle wakes generate airborne dust. The contribution of tire and brake wear is small compared to the other particulate matter emissions processes. Gasoline-powered engines have small rates of particulate matter emissions compared with diesel-powered vehicles.

Long-term operational emissions associated with the Project were calculated using CalEEMod. The proposed Project would construct a 58,734 sq ft self-storage building and 10 new parking stalls. Therefore, the proposed Project analysis was conducted using land use codes *Unrefrigerated Warehouse No-Rail* and *Parking Lot.* Trip generation rates used in CalEEMod for the Project were based on the Project's trip generation, which identifies that the proposed project would generate 85 ADT.[1] In addition, the proposed Project would be all-electric and would not include any natural gas or wood-burning devices, which was assumed in CalEEMod. When Project-specific data were not available, default assumptions from CalEEMod were used to estimate Project emissions. Table J provides the Project's estimated operational emissions.

Table J: Project Operational Emissions

Emission Type	Pollutant Emissions (lbs/day)					
	VOCs	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Mobile Sources	0.3	0.2	2.4	<0.1	0.5	0.1
Area Sources	1.8	<0.1	2.6	<0.1	<0.1	<0.1
Energy Sources	0.0	0.0	0.0	0.0	0.0	0.0
Total Project Emissions	**2.1**	**0.2**	**5.0**	**<0.1**	**0.5**	**0.1**
SCAQMD Threshold	55.0	55.0	550.0	150.0	150.0	55.0
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Compiled by LSA (October 2023).
Note: Some values may not appear to add correctly due to rounding.
CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in diameter
PM_{10} = particulate matter less than 10 microns in diameter
SCAQMD = South Coast Air Quality Management District
SO_X = sulfur oxides
VOCs = volatile organic compounds

The results shown in Table J indicate the Project would not exceed the significance criteria for daily VOC, NO_X, CO, SO_X, PM_{10}, or $PM_{2.5}$ emissions. Therefore, operation of the proposed Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State AAQS.

Long-Term Microscale (CO Hot Spot) Analysis

Vehicular trips associated with the Project would contribute to congestion at intersections and along roadway segments in the vicinity of the Project Site. Localized air quality impacts would

[1] LSA. 2023. *Project Trip Generation Table* (LSA Project No. 20231465). June 15.

occur when emissions from vehicular traffic increase as a result of the Project. The primary mobile-source pollutant of local concern is CO, a direct function of vehicle idling time and, thus, of traffic flow conditions.

CO transport is extremely limited; under normal meteorological conditions, it disperses rapidly with distance from the source. However, under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthy levels, affecting local sensitive receptors (e.g., residents, schoolchildren, the elderly, and hospital patients).

Typically, high CO concentrations are associated with roadways or intersections operating at unacceptable LOS or with extremely high traffic volumes. In areas with high ambient background CO concentrations, modeling is recommended to determine a project's effect on local CO levels.

An assessment of Project-related impacts on localized ambient air quality requires that future ambient air quality levels be projected. Existing CO concentrations in the immediate Project vicinity are not available. Ambient CO levels monitored at the Compton station at 700 North Bullis Road (the closest station to the Project Site), showed a highest recorded 1-hour concentration of 4.5 parts per million (ppm) (the State standard is 20 ppm) and a highest 8-hour concentration of 3.7 ppm (the State standard is 9 ppm) during the past 3 years.[1] The highest CO concentrations would normally occur during peak traffic hours. Thus, CO impacts calculated under peak traffic conditions represent a worst-case analysis.

The Project is expected to result in a net trip generation of approximately 62 daily trips, with 4 trips in the a.m. peak hour and 7 trips in the p.m. peak hour. As the Project would not generate 100 or more a.m. or p.m. peak-hour trips, it did not meet the criteria for an evaluation of study area intersection or roadway segment LOS. Therefore, given the extremely low level of CO concentrations in the project area and the lack of traffic impacts at any intersections, Project-related vehicles are not expected to result in CO concentrations exceeding the State or federal CO standards. No CO hot spots would occur, and the Project would not result in any Project-related impacts on CO concentrations.

Health Risk on Nearby Sensitive Receptors. SCAQMD published its *Final Localized Significance Threshold Methodology* in July 2008, recommending that all air quality analyses include an assessment of air quality impacts to nearby sensitive receptors.[2] This guidance was used to analyze potential localized air quality impacts associated with construction of the proposed Project. Localized significance thresholds (LSTs) are developed based on the size or total area of the emission source, the ambient air quality in the source receptor area (SRA), and the distance to the Project. Sensitive receptors include residences, schools, hospitals, and similar uses that are sensitive to adverse air quality.

LSTs are based on the ambient concentrations of that pollutant within the project SRA and the distance to the nearest sensitive receptor. For the proposed Project, the appropriate SRA for the LST is the Southwest Coastal LA County area (SRA 3). SCAQMD provides LST screening tables for

1 United States Environmental Protection Agency (USEPA). 2023. Outdoor Air Quality Data.

2 SCAQMD. 2008. *Final Localized Significance Threshold Methodology.* July.

25-, 50-, 100-, 200-, and 500-meter source-receptor distances. As identified above, the closest sensitive receptor to the project site is the Torrance Mobile Home Park located approximately 200 ft southwest of the project site. As such, the distance of 200 feet (61 meters) was used. Based on the anticipated construction equipment, it is assumed that the maximum daily disturbed acreage for the proposed project would be 3.5 acres.[1] Tables J and K list the emissions thresholds that apply during Project construction and operation.

As discussed above, the closest sensitive receptor to the Project Site is the Torrance Mobile Home Park, located approximately 200 ft southwest. An LST analysis was completed to show the construction and operational impacts at 61 meters to the nearest sensitive receptors to the Project Site in SRA 3 based on a 3.5-acre daily disturbance area. Tables K and L show the results of the LST analysis during project construction and operation, respectively.

Table K: Project Localized Construction Emissions

Source	Pollutant Emissions (lbs/day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
On-Site Emissions	19.6	14.6	3.3	1.8
Localized Significance Threshold	**161.0**	**1,688.0**	**38.0**	**10.0**
Significant?	**No**	**No**	**No**	**No**

Source: Compiled by LSA (October 2023).
Note: Source Receptor Area 3, based on a 3.5-acre construction disturbance daily area, at a distance of 200 feet from the project boundary.
CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in diameter
PM_{10} = particulate matter less than 10 microns in diameter

Table L: Project Localized Operational Emissions

Source	Pollutant Emissions (lbs/day)			
	NO_x	CO	PM_{10}	$PM_{2.5}$
On-Site Emissions	<1.0	2.7	<1.0	<1.0
Localized Significance Thresholds	**161.0**	**1,688.0**	**9.7**	**2.8**
Significant?	**No**	**No**	**No**	**No**

Source: Compiled by LSA (October 2023).
Note: Source Receptor Area 3, based on a 3.5-acre operational daily area, at a distance of 200 feet from the project boundary.
CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in diameter
PM_{10} = particulate matter less than 10 microns in diameter

By design, the localized impacts analysis only includes on-site sources; however, the CalEEMod outputs do not separate on-site and off-site emissions for mobile sources. For a worst-case scenario assessment, the emissions detailed in Table L assume all area- and energy-source emissions would occur on site and 5 percent of the project-related new mobile sources, which is an estimate of the amount of Project-related on-site vehicle and truck travel, would occur on site. Considering the total trip length included in CalEEMod, the 5 percent assumption is

[1] SCAQMD. n.d. *Fact Sheet for Applying CalEEMod to Localized Significance Thresholds*. Website: http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/caleemod-guidance.pdf (accessed October 2023).

conservative. Table L indicates the localized operational emissions would not exceed the LSTs at nearby residences. Therefore, the proposed operational activity would not result in a locally significant air quality impact.

As detailed in Tables K and L, the emission levels indicate that the Project would not exceed SCAQMD LSTs during project construction or operation. The Project's peak operational on-site NO_x emissions are less than 1 pound per day (lb/day). Due to the small size of the Project in relation to the overall Basin, the level of emissions is not sufficiently high to use a regional modeling program to correlate health effects on a basin-wide level. On a regional scale, the quantity of emissions from the Project is incrementally minor. Because the SCAQMD has not identified any other methods to quantify health impacts from small projects, and due to the size of the Project, it is speculative to assign any specific health effects to small project-related emissions. However, based on this localized analysis, the Project would not expose sensitive receptors to substantial pollutant concentrations. Therefore, the project would not expose sensitive receptors to substantial levels of pollutant concentrations.

Other Emissions, including Odors. Heavy-duty equipment on the Project Site during construction would emit odors, primarily from equipment exhaust. However, the construction activity would cease after individual construction is completed and would not impact a substantial number of people. No other sources of objectionable odors have been identified for the Project.

SCAQMD Rule 402 regarding nuisances states: "A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property." The proposed uses are not anticipated to emit any objectionable odors. Therefore, the Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

Water Quality.

Water Quality Standards

Construction Impacts

Construction activities would involve disturbance, grading, and excavation of soil, which could result in temporary erosion and movement of sediments into the storm drain system, particularly during precipitation events. However, the Project would comply with all applicable National Pollutant Discharge Elimination System (NPDES) permit requirements to reduce impacts to water quality. Projects that disturb greater than 1 acre of soil are subject to the regulatory requirements of the *State Water Resources Control Board (SWRCB) Waste Discharge Requirements for Discharges of Storm Water Runoff Associated with Construction and Land Disturbance Activities* (Order WQ 2022-0057-DWQ NPDES No. CAS000002) (Construction General Permit). Because the Project would disturb more than 1 acre, the Applicant would be required to obtain coverage under the Construction General Permit, which requires the

preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP) and best management practices (BMPs) including, but not limited to, Erosion Control and Sediment Control BMPs designed to minimize erosion and retain sediment on site and Good Housekeeping BMPs to prevent spills, leaks, and discharge of construction debris and waste into receiving waters. Compliance with the standard requirements of the Construction General Permit and the City's Municipal Code would ensure that construction impacts related to surface water quality would be less than significant.

Operational Impacts

Project operation would be subject to the requirements of the *California Regional Water Quality Control Board, Los Angeles Region Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges Within the Coastal Watersheds of Los Angeles Counties* (Order No. R4-2021-0105 NPDES, No. CAS004004) (Regional Phase I MS4 NPDES Permit). In compliance with the permit requirements, a Low Impact Development (LID) Plan has been prepared for the Project (**Attachment F**). The Project LID Plan includes a description of the existing and proposed site drainage and proposed BMPs. The Project would not substantially alter existing drainage patterns of the Project Site. Furthermore, the Project would implement an underground detention system and biofiltration system (modular wetlands) to capture and treat stormwater during Project operation in compliance with the applicable NPDES permit requirements. The biofiltration system would drain into the curb face on Artesia Boulevard. All new proposed storm drainpipes and structures will be sized during final design to convey the proposed peak flows. Because the Project would implement the requirements of the applicable NPDES permit and associated BMPs, impacts to surface water quality would be less than significant.

Groundwater Impacts. Project operation would not require groundwater extraction. In the existing condition, the Project Site is 87.6 percent impervious surface, which precludes substantial infiltration. Furthermore, the soils on site have low permeability and therefore do not allow for infiltration. Post-project conditions within the 0.92-acre construction area would result in 88.5 percent impervious area (0.81 acre) and 11.5 percent pervious area (0.11 acre). As noted above, soils on site have low permeability. Therefore, the Project would not result in an appreciable change in existing conditions.

According to the *Geotechnical Engineering Report* (Terracon 2023) prepared for the Project, groundwater was encountered between 18.5 and 34.5 ft below ground surface (bgs). Historic groundwater elevations indicate shallow groundwater depths around 34 ft bgs. Excavation during construction would be to a maximum depth of 13 ft bgs. Due to the depth of groundwater and the proposed depth of excavation, it is not anticipated that groundwater would be encountered during construction. Therefore, the project would not decrease groundwater supplies or interfere with groundwater recharge.

Erosion or Siltation. During construction activities soil would be exposed and drainage patterns would be temporarily altered during grading and other construction activities, and there would be an increased potential for soil erosion and siltation compared to existing conditions. Additionally, during a storm event, soil erosion and siltation could occur at an accelerated rate. As discussed above, the Construction General Permit requires the preparation of a SWPPP to

identify construction BMPs to be implemented as part of the Project to reduce impacts on water quality during construction, including those impacts associated with soil erosion and siltation. The Project would comply with the requirements of the Construction General Permit and the City's Municipal Code, therefore, construction impacts related to on- or off-site erosion or siltation would be less than significant, and no mitigation is required.

Surface Runoff. The Project would increase the amount of impervious surface within the 0.92-acre construction area by 0.9 percent (0.008 acre). As discussed above, project construction would comply with the requirements of the Construction General Permit and would include the preparation and implementation of a SWPPP. The SWPPP would include construction BMPs to control and direct on-site surface runoff to ensure that stormwater runoff from the construction site does not exceed the capacity of the stormwater drainage systems. Due to the small increase in impervious surface and implementation of stormwater BMPs, Project impacts related to on- or off-site flooding from an increase in surface runoff would be less than significant, and no mitigation is required.

Runoff Exceeding Existing Drainage Systems. Drainage patterns would be temporarily altered during grading and other construction activities, and construction-related pollutants could be spilled, leaked, or transported via storm runoff into adjacent drainages and downstream receiving waters. As previously discussed, the Project would comply with the requirements set forth by the Construction General Permit and SWPPP, which would specify BMPs to be implemented to control the discharge of pollutants in stormwater runoff as a result of construction activities. The Project would cause a minimal increase in impervious surface and would implement an underground detention system and biofiltration system (modular wetlands) to capture and treat stormwater. For these reasons, the Project would not result in an exceedance in capacity of existing or planned stormwater drainage systems. No mitigation is required.

Flooding and Inundation. According to Federal Emergency Management Agency Flood Insurance Rate Map No. 06037C1935F (June 2008), the Project Site is not within a 100-year floodplain. Specifically, the Project Site is within Zone X, an area of minimal flood hazard (outside the 500-year floodplain). According to the California Department of Conservation (2021),[1] the Project Site is not within a tsunami hazard zone. Therefore, no project-related impacts associated with flood flows or release of pollutants from inundation would occur.

Water Quality Control or Groundwater Management Plan. As discussed above, the Project does not have the potential to impact groundwater quality, interfere with groundwater recharge, or decrease groundwater supplies. No groundwater extraction or dewatering is expected during construction and therefore the Project would not interfere with the sustainable management of the groundwater basin. Additionally, project operations would not require groundwater extraction. For these reasons, the Project would not conflict with or obstruct the implementation of a sustainable groundwater management plan. Additionally, Project would comply with the applicable NPDES permits, which require the preparation of a SWPPP and implementation of construction and operational BMPs to reduce pollutants of concern in

[1] California Department of Conservation. 2021. Los Angeles County Tsunami Hazard Areas. Website: https://www.conservation.ca.gov/cgs/tsunami/maps/los-angeles (accessed November 10, 2023).

stormwater runoff. As such, the project would not result in water quality impacts that would conflict with Los Angeles RWQCB's Water Quality Control Plan (Basin Plan)[1]. Impacts related to conflict with a water quality control plan would be less than significant, and no mitigation is required.

Overall, the Project would not result in impacts associated with hydrology and water quality.

(1) The project site is adequately served by all required utilities and services.

The Project Site is served by all utilities and public services in the existing condition. Specific utilities and public service providers serving the Project Site include the following:

Water	Torrance Municipal Water
Wastewater	Sanitation Districts of Los Angeles County (LACSD)
Fire	Torrance Fire Department
Police	Torrance Police Department
Schools	Torrance Unified School District
Landfill	Private waste haulers
Electricity	Southern California Edison
Natural Gas	Southern California Gas Company

The Project Site is currently developed for qualified urban uses as defined by Public Resources Code (PRC) Section 21072. The Project would continue the existing self-storage use on the Project Site. As such, the Project Site is served by all utilities and service providers in the existing condition.

Torrance Municipal Water is the water provider for the Project Site. The Public Works Department of the City of Torrance maintains and operates the sewer collection system, including storm drains, catch basins, and sewer lines. Water usage for operation of the proposed additions to the self-storage uses on site would be minimal, limited to irrigation for the existing landscaping and fire suppression systems. The new self-storage building would require similar water use as the existing buildings on site and project operation would not substantially increase water usage on the Project Site compared to existing conditions due the use as a storage facility. Wastewater would only be generated from the office use and fire suppression systems in the unlikely event of a fire. The Project would utilize the existing on-site water and wastewater distribution systems to serve the new building. The on-site systems would be constructed in compliance with the City's building and plumbing codes in its Municipal Code. The proposed on-site distribution systems would connect to the existing water and wastewater facilities located within the Project Site. Extension of the water and wastewater infrastructure from the existing system within the Project Site would be a routine part of the construction process and would not have a material environmental impact. The water and wastewater facility

[1] Regional Water Quality Control Board, Los Angeles Region 4. 2014. Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan). Website: https://www.waterboards.ca.gov/losangeles/water_issues/programs/basin_plan/basin_plan_documentation.html (accessed December 7, 2023).

improvements would be limited to the Project Site, and connection points would remain as they exist now.

CALIFORNIA ENVIRONMENTAL QUALITY ACT CATEGORICAL EXEMPTIONS—EXCEPTIONS

State CEQA Guidelines Section 15300.2 provides exceptions to categorical exemptions that apply to specific types of projects. The exceptions to the CEs pursuant to Section 15300.2 of the *State CEQA Guidelines* are the following:

(a) Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located—a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply in all instances, except where the project may impact an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.

The Project does not rely on the specific classes of exemptions (3, 4, 5, 6, and 11) called out at the beginning of exception 15300.2(a). This exception does not apply to the Project.

Nonetheless, if this exception were applicable to a Class 32 exemption, the Project would still not qualify as an exception to the exemption. The Project Site is at 17575 South Western Avenue. The Project Site is characterized by pavement, storage facilities, and landscaping associated with the existing on-site use. The Project Site is surrounded on all sides by urban development and is zoned and designated for Limited Manufacturing (M-L). Therefore, the site is not particularly sensitive in terms of environmental resources, and there are no mapped environmentally sensitive habitat areas within or in close proximity to the Project Site. In addition, the Project, like all projects, would be subject to the provisions of the MBTA, which prohibits disturbing or destroying active nests, and California Fish and Game Code Section 3503, which protects nests and eggs.

(b) Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place over time is significant.

The Project is an infill development project in an urban area. According to the Governor's Office of Planning and Research, the term "infill development" refers to building within unused and underutilized lands within existing development patterns, typically, but not exclusively, in urban areas.[1] The Project Site and surrounding areas were previously developed for qualified urban uses as defined by PRC Section 21072.

The Project would be consistent with existing land use and visual patterns typical of an urban built environment. No amendments to an adopted planning document would be required for implementation of the Project, nor would the project divide an established community. Therefore, the Project would not contribute to a significant cumulative land use impact.

[1] Governor's Office of Planning and Research. Infill Development. Website: https://opr.ca.gov/planning/land-use/infill-development/ (accessed November 6, 2023).

Neither the Project Site nor any other site in the city is currently used for agricultural or farmland production. Neither the Project Site nor the local area is particularly sensitive in terms of biological resources, and there are no mapped environmentally sensitive habitat areas within or in close proximity to the Project Site. The Project would not result in the loss of known mineral resources or a locally important mineral resource recovery site.

The Project would contribute criteria pollutants to the area during project construction. A number of individual projects in the area may be under construction simultaneously with the Project. Although there are other self-storage facilities in the area, there are no other proposed projects of the same type within the immediate vicinity of the Project **[City to confirm].** Depending on construction schedules and actual implementation of projects in the area, generation of fugitive dust and pollutant emissions during construction could result in substantial short-term increases in air pollutants. However, each project would be required to comply with SCAQMD's standard construction measures. The Project's short-term construction CO, NO_2, PM_{10}, and $PM_{2.5}$ emissions would not exceed the LSTs. Therefore, construction of the Project would have a less than significant impact with regard to regional and localized emissions and would not result in cumulatively considerable impacts.

The Project Site was previously disturbed and developed with existing structures. The Project consists of the demolition and replacement of existing self-storage facilities. As such, ground-disturbing activities associated with project construction activities are not likely to directly or indirectly destroy a unique paleontological resource or site or a unique geological feature due to the disturbed nature of the Project Site and the limited depth of excavation (13 ft bgs).

The Project Site, like all of Southern California, would be subject to seismic ground shaking in the event of an earthquake. The Project would be required to comply with the California Building Code in effect at the time of construction and would not exacerbate an existing geologic or seismic hazard.

The Project is not located in an airport land use plan or within 2 miles of a public or private airstrip. The nearest airport is Hawthorne Municipal Airport, approximately 3.5 miles from the Project Site. Due to the nature of this project (i.e., self-storage), it would not contribute to the creation of a hazard to the public or the environment involving the transport, use, or disposal of hazardous materials.

As discussed above, with compliance with the applicable NPDES permit requirements and implementation of BMPs, project impacts to hydrology and water quality would be less than significant. It is assumed for the purposes of this analysis that the other projects would also comply with applicable NPDES permit requirements and would also result in less than significant impacts related to hydrology and water quality.

The Project would not induce substantial population growth or displace housing or substantial numbers of people. The Project would not provide new housing opportunities or extend roads or other infrastructure to areas not previously served. The project would include the demolition of existing self-storage buildings and construction of a larger self-storage facility. However, the proposed building additions would not represent a net increase in businesses or jobs because the Project Site would continue to operate as a self-storage facility, similar to existing

conditions. Therefore, no impacts to population growth would occur because it is unlikely the project would create new jobs in the area. Similarly, because the Project would not increase population in Torrance, construction and operation of the self-storage facility would not be anticipated to 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.

Upon completion of construction, the Project Site would operate in a nearly identical manner as its current operation. Therefore, the Project would not alter cumulative regional demand for fire protection services and would have a less than significant impact. The Project also would not decrease the officer-to-resident ratio in Torrance or trigger the need for new or physically altered police facilities. Pursuant to California Education Code Section 17620(a)(1), the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district for the purpose of funding the construction or reconstruction of school facilities. Applicants/developers for all projects would be required to pay such fees to reduce any impacts associated with new commercial development on school services.

As stated above, the Project Site and the surrounding areas were previously developed for qualified urban uses as defined by PRC Section 21072. As such, the site is served by all utilities in the existing condition. Torrance Municipal Water is the water provider for the Project Site. The City of Torrance Department of Public Works maintains and operates the sewer collection system, including storm drains and sewer systems. Installation of water and sewer facilities sufficient to serve a Project is a standard condition for development projects. The Project would also pay any required water and sewer connection fees. The Project Site and other regional projects in the city would be provided waste disposal from private waste haulers and existing landfills. The Project would not be expected to result in or contribute to a significant impact related to waste disposal.

The Safety Element of the Torrance General Plan (adopted 2010) does not discuss wildfire risk in Torrance. Policy S 6.3 of the Safety Element requires the adoption of safety standards for areas in the city susceptible to hillside wildfires. The Project site is not located on or near a hillside area, is generally flat, and is surrounded by urban uses; therefore, it is not subject to substantial wildfire risk.

In summary, the Project is an infill development project in an urban area. The Project would rely on and can be accommodated by the existing road system, public services, and utilities. Although there are other self-storage facilities in the area, there are no other proposed projects of the same type within the immediate vicinity of the Project that would cause significant cumulative impacts **[City to confirm].** Impacts of the Project would not be cumulatively considerable in connection with the effects of past projects, the effects of other current projects, or the effects of probable future projects.

(c) Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

The Air Quality Analysis and the Noise and Vibration Impact Analysis for the Project conclude that the Project would not result in a significant impact related to these topics. No amendments to an adopted land use or planning document would be required for implementation of the Project, and the Project would be consistent with the City's Municipal Code requirements. The Project would continue the existing self-storage use on-site and would operate in a nearly identical manner as its current operation. Given the urban nature of the Project Site and the compatibility of the Project with the character of the surrounding uses, there is no evidence to indicate that the Project would have a significant effect on the environment due to unusual circumstances.

(d) Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified Environmental Impact Report.

The nearest eligible State-designated scenic highway to the Project Site is State Route (SR) 1, which is approximately 11.3 miles southeast of the Project Site. Therefore, the Project does not have the potential to damage resources within a State-designated scenic highway. The City of Torrance adopted a Historic Preservation Program that aims to preserve historic resources that reflect important themes in the City's heritage. The Torrance Tract Preservation Plan focuses on residentially zoned areas within in the Torrance Tract Overlay Zone. The Project Site is not located within the Torrance Tract Overlay Zone and is not zoned for residential use. Therefore, the Project Site is not subject to the Historic Preservation Plan or Historic Preservation Ordinance (City Municipal Code Section 91.50.010). The Project Site is developed with a self-storage facility; none of the existing structures on the Project Site are over 50 years old and, therefore, are not eligible for listing as historic resources.

(e) Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.

Pursuant to Government Code Section 65962.5, the Hazardous Waste and Substances Sites List (Cortese List) has been compiled by the California Environmental Protection Agency (CalEPA) Hazardous Materials Data Management Program. The California Department of Toxic Substances Control (DTSC) compiles information from subsets of the following databases to make up the Cortese List:

1. The DTSC list of contaminated or potentially contaminated hazardous waste sites listed in the California Sites database (formerly known as ASPIS);
2. The California SWRCB listing of leaking underground storage tanks (LUSTs); and
3. The California Integrated Waste Management Board list of sanitary landfills that have evidence of groundwater contamination or known migration of hazardous materials (formerly WB-LF; now Assembly Bill 3750).

The Project is not located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (EnviroStor 2023).[1] The Project Site is located within 0.25 mile of two current LUST cleanup sites (GeoTracker 2023)[2]. Honeywell Inc., located 0.13 mile northeast of the Project Site at 17300 South Western Avenue, has been under remediation since 2015. Groundwater at this site potentially flows toward the Project Site; however, a groundwater extraction and treatment system has been installed and, based on distance, this site is not anticipated to impact the Project. Products/Avnet Inc., located 0.16 mile west of the Project Site at 2040 Artesia Boulevard, has been inactive since 2014. These LUST sites are either inactive or in remediation and are not anticipated to impact the Project.

(f) Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

As described in City of Torrance Municipal Code Section 91.50.010, the historic preservation ordinance promotes the protection and enhancement of historic resources important to the City's heritage. The buildings on the Project Site were constructed in approximately 1975 and 1976. As the existing buildings on the Project Site are not 50 years old, they are not old enough to be considered historical resources and are not eligible for listed at the Federal, State, or local levels. Because of the age of the existing buildings, they do not need to be evaluated as historical resources pursuant to CEQA. As such, project construction and operation would have no impacts to "historical resources" pursuant to *State CEQA Guidelines* Section 5064.5.

CONCLUSION

In summary, the Project will not result in any specific or general exceptions to the use of a CE as detailed under *State CEQA Guidelines* Section 15332. The Project would not cause any impacts to traffic, noise, air quality, or water quality. The Project Site does not have value as habitat for endangered, rare, or threatened species. The Project would not result in damage to a scenic resource within a highway officially designated as a State Scenic Highway. The Project Site is not on any list compiled pursuant to Section 65962.5 of the Government Code. Furthermore, no unusual circumstances or potential cumulative impacts would occur that may reasonably create an environmental impact. Therefore, the Project is exempt from the provisions of CEQA as specified by the *State CEQA Guidelines* identified above.

Attachments:
- A: Figures 1 and 2
- B: Parking Analysis Memorandum
- C: Transportation Analysis Memorandum
- D. Noise and Vibration Impact Analysis Memorandum
- E: Air Quality Technical Memorandum
- F: Low Impact Development Plan

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1 Department of Toxic Substances Control. 2023. EnviroStor. Website: https://www.envirostor.dtsc.ca.gov/public/ (accessed November 10, 2023).

2 State Water Resources Control Board. 2023. GeoTracker Map. Website: https://geotracker.waterboards.ca.gov/ (accessed November 10, 2023).