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If you have any questions, please contact the Commission Office at (213) 978-1300.

SECONDARY SUBMISSIONS



5a. CPC-2024-3381-DB-CDO-VHCA

Adele Slaughter <adeleslaughter@me.com>

Mon, Mar 23, 2026 at 11:30 AM

To: laura.frazinsteele@lacity.org, cpc@lacity.org, cecilia.lamas@lacity.org, councilmember.blumenfield@lacity.org

Cc: Jamie York <jamielaurenyork@gmail.com>, Marianne King <mkingofchatsworth@gmail.com>

Dear City Planning Commission:

At your upcoming meeting on THURSDAY, MARCH 26, 2026, please remove Item 5A from the consent agenda so we can engage in a necessary and robust discussion.

This project located in Council District 3 is deeply concerning and, if approved, will set a deplorable precedent for our city. It disregards the basic principles of human decency and care for our elderly, revealing a discriminatory and ageist mindset in its design.

In the planning document the review from 360 Degree Design unequivocally states, "This plan creates what will be a **warehouse** for seniors, because there is little provision for socializing beyond meals. For example, there are no amenities except the living room. There is no outdoor open space, landscaping, or opportunities to exercise." This is not just disappointing; it is unacceptable.

Furthermore, 360 points out that the proposed building will exacerbate the urban heat island effect and contribute significantly to stormwater runoff due to: (1) a complete lack of trees and tree canopy; (2) an absence of landscaping; and (3) the fact that the entire area will be impervious. Such negligence is not only dangerous but also goes against our city's commitment to environmental sustainability.

The city has made a clear mandate to increase tree canopy cover in low-income, heat-impacted areas by at least 50% by 2028. This plan, if allowed to proceed, directly undermines that commitment.

Rest assured, Los Angeles citizens are not opposed to development. We are fervently against development that threatens to harm our community, degrade our living environment, and neglect our elders. This proposal must be reevaluated in light of these critical concerns.

Adele Slaughter
Stakeholder of CD4

I also serve as the vice chair and CD4 Alternate Representative to the Community Forest Advisory Committee

RE: OPPOSED to Item# 5.a. CPC-2024-3381-DB-CDOVHCA – 7354 Baird Ave.

Dear City Planning Commissioners,

Please take this item off of consent. The above project deserves further discussion and consideration from you as it will set an extremely bad precedent for the City on all projects going forward. Namely, that we could now have residential projects that are 100% impermeable, with concrete from property line to property line, with ZERO landscaping, ZERO trees, and ZERO open space. Such action will also render our Landscape Ordinance (current or future) NULL & VOID.

Following are comments regarding the staff report that warrants further review:

1. **The project does not comply with LAMC 12.21 C(1)(g).** This is not included in the entitlement request nor is it mentioned in the staff report. LAMC 12.21 C(1)(g) (see attached printout) requires that all required front yards, with exception of necessary driveways and pathways, must be used for landscaping, and shall not otherwise be paved over. That there shall be one tree for each 500 square feet of planted area. This applies to numerous residential typologies, including projects with “guest rooms”. A Zoning Administrators Interpretation should be required if there is a question as to whether the intent of this code section applies to a projects with “shared housing units,” which are also treated as guest rooms.
2. **LAMC 12.21 G – Open Space Requirement for Six or More Residential Units. (Added by Ord. No. 171,753, Eff. 11/17/97.)** This code section includes too many variables that can be misinterpreted. A Zoning Administrator’s Interpretation should also be conducted for the open space requirement on residential projects, especially when a new terminology or housing type is introduced after the code was created (i.e. Shared Housing Building or shared housing units).
3. Page A-5, second para – It is stated “.....LAMC Section 12.40 - 12.43 regulates landscaping, including but not limited to tree planting and water management, in compliance with the City’s Landscape Ordinance No. 170,978 (effective May 12, 1996; operational July 12, 1996; amended through April 10, 2005). City Planning Commission Guidelines “O” in compliance with LAMC Sections 12.40 – 12.43 implements the Landscape Ordinance with a landscaping point system and incorporates guidelines for planting trees, plants, and shrubs. However, under Guidelines “O,” ***a specific number of trees would not be required for the project herein.***”

The above statement is incorrect. Per the Landscape Ordinance LAMC 12.42 C -AIR QUALITY ENHANCEMENT 1. **Trees (a) At least one tree, which shall not be a palm, shall be provided in the project for each 500 square feet of landscaped area in the project.** A minimum of 100 square feet of unpaved area shall be provided at the base of each tree, the shortest dimension of which shall be 4 feet minimum, to allow for water infiltration and gas exchange.....

This project would require a minimum of 15 points due to lot size of 7,503 sf.

Further analysis, detail, and discussion about what would be required per the Landscape Ordinance is warranted.

4. Professional Volunteer Review – See Page A-12 and A-13 – The comments from the PVP (and responses and/or lack thereof from the applicant) clearly warrant further discussion. There are bogus claims being made by the applicant that have not been called out and should be.
5. Per Page F-1 – **DENSITY BONUS / AFFORDABLE HOUSING INCENTIVES COMPLIANCE FINDINGS.** It reads “Pursuant to Chapter 1, LAMC Section 12.22 A.37(f) and consistent with California Government (CA GC) Code Section 65915(d)(1), a Housing Development may request Incentive(s) not on the Menu of Incentives to seek a deviation from a Development Standard elsewhere in the Los Angeles Municipal Code (LAMC) or a site’s applicable zoning ordinance, Community Plan, Specific Plan, or overlay. ***The Incentive shall be granted unless any of the following written findings are made based upon substantial evidence.***” [Italics/bold for emphasis]

Finding No. 1 is **“The Incentive does not result in identifiable and actual cost reductions, consistent with CA GC Section 65915(k), to provide for affordable housing costs, as defined in California Health and Safety Code Section 50052.5, or for rents for the targeted units to be set as specified in CA GC Section 659154(c).”**

The conclusion made by Planning reads *“The record does not contain substantial evidence that would allow the City Planning Commission to make a finding that the requested Incentive to deviate from all landscaping requirements does not result in identifiable and actual cost reductions to provide for affordable housing costs per State Law.”*

Does that mean that Planning does not have any substantial evidence and therefore you must approve it??? Where is the record for this? This makes no sense and nor does the wording in Finding No. 1 stating that “the Incentive does not result in identifiable and actual cost reductions...” – if that is the case, why are we approving this incentive?

Was there any attempt to quantify what the cost reductions would be from these landscaping incentives?

6. Per Page F-3 - **DENSITY BONUS / AFFORDABLE HOUSING WAIVER COMPLIANCE FINDINGS.** It reads “Waiver of Development Standards shall be approved by the applicable decision-making authority ***unless that decision making authority makes one of the following findings:***” [Italics/bold for emphasis]

Finding No. 4 reads **“The Development Standard associated with a request for a Waiver will not have the effect of physically precluding the construction of a development meeting the eligibility criteria described in LAMC Section 12.22 A.37(c) at the densities or with**

the Base Incentives and Additional Incentives permitted under this subdivision.”

Statement made by Planning *“The applicant is requesting and is approved for Waivers of Development Standards for reduced yard setbacks, bicycle parking, and tree planting. As disclosed by the applicant, denying these Waivers would physically preclude the construction of the 34 unit Shared Housing Building.”*

Example of conclusions made by Planning *“Granting the Waiver of Development Standards for a front yard setback allows the developer to expand the building envelope so that additional Shared Housing Units can be constructed, and the overall space dedicated to living opportunities for Senior Citizens can be increased.”*

The conclusions are similar for each of the 8 Waivers, which are blanket statements without any analysis shown in the record. For example, there is significant space now available by granting these incentives yet we have this 2,509 square foot “covered area” blank slate for them to use however they want. Couldn’t that space include shared housing units and provide some landscaping? What is the minimum space required for a shared housing unit in a residential care facility for the elderly?

There are too many unanswered questions with this project, including the fact that these residents will be non-ambulatory? What safety precautions are required for that? What is the evacuation plan? This needs to be vetted out now, as the City of Los Angeles will be the first responders.

I hope you will agree this project needs more careful thought and analysis. Please do not make a decision until more information and analysis is provided. The seniors deserve better and so do we.

Marianne King

Resident of CD12
Former City Planner,
Community Forest Advisory Committee Rep

G. Open Space Requirement for Six or More Residential Units. (Added by Ord. No. 171,753, Eff. 11/17/97.)

1. **Purpose.** It is the purpose of this subsection to establish reasonable and uniform regulations to provide usable open space as a means to fulfill the following objectives: afford occupants of multiple residential dwelling units opportunities for outdoor living and recreation; provide safer play areas for children as an alternative to the surrounding streets, parking areas, and alleys; improve the aesthetic quality of multiple residential dwelling units by providing relief to the massing of buildings through the use of landscape materials and reduced lot coverage; and provide a more desirable living environment for occupants of multiple residential dwelling units by increasing natural light and ventilation, improving pedestrian circulation and providing access to on-site recreation facilities.

2. **Regulations.** New construction (resulting in additional floor area and additional units) of a building or group of buildings containing six or more dwelling units on a lot shall provide at a minimum the following usable open space per dwelling unit: 100 square feet for each unit having less than three habitable rooms; 125 square feet for each unit having three habitable rooms; and 175 square feet for each unit having more than three habitable rooms.

For purposes of this subsection, usable open space shall mean an area which is designed and intended to be used for active or passive recreation. Usable open space may consist of private and/or common area as further defined and regulated herein. Parking areas, including access aisles, driveways, and required front and side yards, open space areas located above the first habitable room level, except as otherwise provided for herein, shall not qualify as usable open space.

(a) Common Open Space:

(1) Common open space shall meet each of the following requirements:

(i) Be open to the sky and have no structures that project into the common open space area, except as provided in Section [12.22 C.20.\(b\)](#),

(ii) Be readily accessible to all the residents of the site,

(iii) Have a minimum area of 400 sq. ft. with no horizontal dimension less than 15 feet when measured perpendicular from any point on each of the boundaries of the open space area,

(iv) Constitute at least 50% of the total required usable open space in developments built at an R3, RAS3, R4, RAS4, and/or R5 density regardless of the underlying zone. **(Amended by Ord. No. 174,999, Eff. 1/15/03.)**

(v) Be located at the grade level or first habitable room level, except in developments built at an R3, RAS3, R4, RAS4, and/or R5 density regardless of the underlying zone. **(Amended by Ord. No. 174,999, Eff. 1/15/03.)**

(2) Common open space areas shall incorporate recreational amenities such as swimming pools, spas, picnic tables, benches, children's play areas, ball courts, barbecue areas and sitting areas. **(Amended by Ord. No. 184,505, Eff. 1/11/17.)**

(3) A minimum of 25 percent of the common open space area shall be planted with ground cover, shrubs or trees. At least one 24-inch box tree for every four dwelling units shall be provided on site and may include street trees in the parkway. For a surface area not located directly on finished grade that is used for common open space, and located at ground level or the first habitable room level, shrubs and/or trees shall be contained within

permanent planters at least 30-inches in depth, and lawn or ground cover shall be at least 12- inches in depth. All required landscaped areas shall be equipped with an automatic irrigation system and be properly drained.

The Director of Planning or the Director's designee shall have the authority to review and approve or disapprove all proposed landscape plans submitted in compliance with this Paragraph, pursuant to Sec. 13B.3.1. (Administrative Review) of [Chapter 1A](#) of this Code. **(Amended by Ord. No. 187,712, Eff. 1/23/23, Oper. 1/22/24; Ord. No. 187,930, Eff. 7/7/23.)**

(4) Notwithstanding the provisions set forth in this paragraph:

(i) Recreation rooms at least 600 square feet in area for a development of 16 or more dwelling units, or at least 400 square feet in area for a development of fewer than 16 dwelling units, may qualify as common open space, but shall not qualify for more than 25 percent of the total required usable open space.

(ii) Roof decks in developments built at an R3 or an RAS3 density, regardless of the underlying zone, may be used as common open space, excluding that portion of the roof within ten feet from the parapet wall. **(Amended by Ord. No. 174,999, Eff. 1/15/03.)**

(iii) Roof decks in developments built at an R4, RAS4, and/or R5 density, regardless of the underlying zone, may be used in their entirety as common open space. **(Amended by Ord. No. 174,999, Eff. 1/15/03.)**

(b) **Private Open Space.** Private open space is an open space area which is contiguous to and immediately accessible from a single dwelling unit and which meets all of the following requirements of the zones herein specified:

(1) In the RD 1.5 and more restrictive zones:

(i) private open space shall be located at grade level or the first habitable room level and be open to the sky. Structures may project no more than three feet into the private open space area, provided there is a minimum eight foot vertical clearance under the projection, except as provided in [Section 12.22 C.20.\(b\)](#);

(ii) private open space shall be enclosed by a solid fence at least four feet in height; and

(iii) the private open space area shall have no horizontal dimension less than eight feet, when measured perpendicular from any point on each of the boundaries of the open space area and contain a minimum of 100 square feet of which no more than 100 square feet per dwelling unit shall be attributable to the total required open space.

(2) **(Amended by Ord. No. 174,999, Eff. 1/15/03.)** In developments built at an R3, RAS3, R4, RAS4, and/or R5 density regardless of the underlying zone, private open space may be provided above the first habitable room level. When so provided, it shall:

(i) contain a minimum of 50 square feet of which no more than 50 square feet per dwelling unit shall be attributable to the total required usable open space;

(ii) have no horizontal dimension less than six feet when measured perpendicular from any point on each of the boundaries of the open space area; and

(iii) provide a minimum eight foot vertical clearance under any projection, except as provided in Section [12.22](#) C.20.(b); and

(iv) that portion of a balcony which extends or projects into a required front yard in compliance with Section [12.22](#) C.20.(d) may qualify as usable open space provided it meets each of the above specified requirements set forth in this subparagraph.

3. Director Determination. (Amended by Ord. No. 187,712, Eff. 1/23/23, Oper. 1/22/24; Ord. No. 187,930, Eff. 7/7/23.) If a development proposed with an R3, RAS3, R4, RAS4, or R5 density, regardless of the underlying zone, fails to meet the open space standards of this Subsection, an applicant may apply for a Director Determination, pursuant to Sec. 13B.2.5. (Director Determination) of [Chapter 1A](#) of this Code.

(a) **Application.** The applicant shall file an application in the public office of the Department of City Planning upon a form prescribed for that purpose and pay a filing fee equivalent to that established for a “Miscellaneous Plan Approval”. This fee is set forth in Section [19.01](#) I. of this Chapter. The application shall be accompanied by architectural, landscape and structural plans for the development, and other information as required by the Director of Planning. All open space areas for the development shall be clearly identified in the materials submitted.

(b) **Standards of Review.** No decision granting approval pursuant to Sec. 13B.2.5. (Director Determination) of [Chapter 1A](#) of this Code shall exceed:

(1) a ten percent reduction in the total required usable open space, provided that any reduction is to the common open space portion only; or

(2) a ten percent increase in the qualifying area of recreation rooms up to a maximum of 35 percent of the total required usable open space; or

(3) a ten percent reduction in the required area for planting of ground cover, shrubs and trees in common open space, but that reduction shall not decrease the total required usable open space.

(c) **Supplemental Findings.** Despite the findings in Sec. 13B.2.5. (Director Determination) of [Chapter 1A](#) of this Code, the Director must find:

(1) that the open space provided conforms with the objectives of this subsection, and

(2) that the proposed project complies with the total usable open space requirements.

LAMC 12.21 C(1)(g)

(g) **(Amended by Ord. No. 173,492, Eff. 10/10/00.)** Every required front, side and rear yard shall be open and unobstructed from the ground to the sky, except for those projections permitted by Sections [12.08.5](#), [12.09.5](#) and [12.22](#).

No automobile parking space shall be provided or maintained within a required front yard. Except where a lot is developed with a building meeting the requirements of Section [12.08.3](#) B.1., not more than 50 percent of a required front yard shall be designed, improved or used for access driveways.

All portions of the required front yard of one-family dwellings, two-family dwellings, multiple dwellings or group dwellings, apartment houses, hotels, motels, apartment hotels and retirement hotels in the RE, RS, R1, RU, RZ, R2, RD, R3, RAS3, R4, RAS4, R5, or C Zones not used for necessary driveways and walkways, including decorative walkways, shall be used for planting, and shall not otherwise be paved. The planted area in the RD, R3, RAS3, R4, RAS4, R5, or C Zones shall be planted in accordance with a landscape plan prepared by a licensed landscape architect, licensed architect, or landscape contractor to the satisfaction of the Department of City Planning. The planted area shall include at least one tree, which shall be at least 15 gallon in size and at least six feet in height at the time of planting, for each 500 square feet of planted area and shall be equipped with an automatic irrigation system, which shall be properly maintained. **(Amended by Ord. No. 179,191, Eff. 11/5/07.)**

A fee pursuant to Section [19.01](#) I. shall be paid to the Department of City Planning for the checking of landscape plans, pursuant to this paragraph. However, the fee shall be waived if any other fee has been paid for checking of landscape plans for the same property.

No swimming pool, fish pond or other body of water which is designed or used to contain water 18 inches or more in depth shall be permitted in any required yard space in which fences over 3-1/2 feet in height are prohibited, even though the pool, pond or body of water extends below the adjacent natural ground level.

Correct LAMC Code Section 12.21 C(1)(g) to be added to comment letter from Marianne King

Los Angeles City Planning Commission
200 N. Spring Street
Los Angeles, CA 90012

Re: Support for the LAX Sign District Update

Dear Honorable Commissioners,

Though I am an elected member of the Neighborhood Council of Westchester/Playa, I am writing as an individual to express my support for the proposed LAX Sign District update.

LAX is one of the busiest transportation hubs in the world and serves as a global gateway to the City of Los Angeles. The proposed Sign District update represents a thoughtful and balanced approach to signage in the airport area. Importantly, this effort follows the removal of existing billboards around LAX, ensuring that the focus moving forward is on fewer, higher-quality, architecturally integrated signs rather than an increase in visual clutter.

I also appreciate that the district is carefully limited to airport-serving commercial areas and includes strong controls related to illumination, size, motion, and placement. In addition, the update recognizes the airport's role as a major economic engine and international gateway. High-quality signage and coordinated design standards contribute to a cohesive and welcoming gateway experience, reflecting the scale and importance of LAX while supporting tourism, jobs, and airport-related economic activity.

For these reasons, I respectfully support the proposed LAX Sign District update and encourage its approval.

Sincerely,

Geoff Maleman



CC:

Michelle Carter, City Planner - michelle.carter@lacity.org
Esther Ahn, City Planner - esther.ahn@lacity.org



Los Angeles City Planning Commission
200 N. Spring Street
Los Angeles, CA 90012

Re: Support for the LAX Sign District Update

Dear Honorable Commissioners,

On behalf of the Gateway to LA Business Improvement District, I am writing to express our support for the proposed LAX Sign District update.

LAX is one of the busiest transportation hubs in the world and serves as a global gateway to the City of Los Angeles. The proposed Sign District update represents a thoughtful and balanced approach to signage in the airport area. Importantly, this effort follows the removal of existing billboards around LAX, ensuring that the focus moving forward is on fewer, higher-quality, architecturally integrated signs rather than an increase in visual clutter.

We also appreciate that the district is carefully limited to airport-serving commercial areas and includes strong controls related to illumination, size, motion, and placement. In addition, the update recognizes the airport's role as a major economic engine and international gateway. High-quality signage and coordinated design standards contribute to a cohesive and welcoming gateway experience, reflecting the scale and importance of LAX while supporting tourism, jobs, and airport-related economic activity.

For these reasons, the Gateway to LA Business Improvement District respectfully supports the proposed LAX Sign District update and encourages its approval.

Sincerely,

Tajh Henderson | Executive Director

Gateway to Los Angeles BID

CC:

Michelle Carter, City Planner - michelle.carter@lacity.org

Esther Ahn, City Planner - esther.ahn@lacity.org



9100 S. Sepulveda Blvd., Ste. 210
Los Angeles, CA 90045
tel 310.645.5151
info@laxcoastal.com

Los Angeles City Planning Commission
200 N. Spring Street
Los Angeles, CA 90012

Re: Support for the LAX Sign District Update

Dear Honorable Commissioners,

On behalf of LAX Coastal Chamber of Commerce, I am writing to express our support for the proposed LAX Sign District update.

Serving the communities of Westchester, Marina del Rey, Playa Vista, Playa del Rey, Ladera Heights, and surrounding areas of Los Angeles, the LAX Coastal Chamber of Commerce promotes business and enhances the vitality of our community through member services, educational programs, strategic partnerships, community outreach, and legislative advocacy.

LAX is one of the busiest transportation hubs in the world and serves as a global gateway to the City of Los Angeles. The proposed Sign District update represents a thoughtful and balanced approach to signage in the airport area. Importantly, this effort follows the removal of existing billboards around LAX, ensuring that the focus moving forward is on fewer, higher-quality, architecturally integrated signs rather than an increase in visual clutter.

We also appreciate that the district is carefully limited to airport-serving commercial areas and includes strong controls related to illumination, size, motion, and placement. In addition, the update recognizes the airport's role as a major economic engine and international gateway. High-quality signage and coordinated design standards contribute to a cohesive and welcoming gateway experience, reflecting the scale and importance of LAX while supporting tourism, jobs, and airport-related economic activity.

For these reasons, **LAX Coastal Chamber of Commerce** respectfully supports the proposed LAX Sign District update and encourages its approval.

Respectfully,

A handwritten signature in black ink, appearing to read "C Maender".

Chad Maender
President & CEO
LAX Coastal Chamber

CC:

Michelle Carter, City Planner - michelle.carter@lacity.org
Esther Ahn, City Planner - esther.ahn@lacity.org





March 18, 2026

Los Angeles City Planning Commission
200 N. Spring Street
Los Angeles, CA 90012

Karen Dial
Drollinger Properties
President

John Ruhlen
Ruhlen & Associates
Secretary

Jack Davis
RE/MAX Estate Properties
Treasurer

Eric Glyn-Davies
Drollinger Properties

Marc Huffman
MH Land Use Consulting

Heather Lemmon
Westbluff Realty
and Property Management

Donald R. Duckworth
Executive Director

Re: Support for the LAX Sign District Update

Honorable Commissioners:

On behalf of Westchester Town Center Business Improvement District (WTC BID) this letter will express our support for the proposed LAX Sign District Update.

LAX is one of the busiest transportation hubs in the world and serves as a global gateway to the City of Los Angeles. The proposed Sign District Update represents a thoughtful and balanced approach to signage in the airport area. Importantly, this effort follows the removal of existing billboards around LAX, ensuring that the focus moving forward is on fewer, higher-quality, architecturally integrated signs rather than an increase in visual clutter.

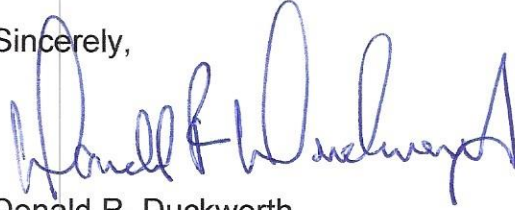
We also appreciate that the district is carefully limited to airport-serving commercial areas and includes strong controls related to illumination, size, motion, and placement. In addition, the update recognizes the airport's role as a major economic engine and international gateway. High-quality signage and coordinated design standards contribute to a cohesive and welcoming gateway experience, reflecting the scale and importance of LAX while supporting tourism, jobs, and airport-related economic activity.

It is also commendable that the LAX Sign Design District includes funding for streetscape and pedestrian enhancements that will demonstrably improve the quality of life enjoyed in business districts located adjacent to LAX.

WTC BID Support Letter
LAX Sign Design District
March 18, 2026
Page 2

For these reasons, the Westchester Town Center BID Board has unanimously voted to support adoption of the proposed LAX Sign District Update and encourages its approval.

Sincerely,

A handwritten signature in blue ink, appearing to read "Donald R. Duckworth". The signature is fluid and cursive, with the first name "Donald" being the most prominent.

Donald R. Duckworth
Executive Director

CC: Michelle Carter, City Planner - michelle.carter@lacity.org
Esther Ahn, City Planner - esther.ahn@lacity.org

March 24, 2026

Los Angeles City Planning Commission

c/o Julissa Lopez-Hodoyan

200 N. Spring Street, Room 721

Los Angeles, CA 90012

Subject: REQUEST FOR CONTINUATION – CPC-2025-3079-DB-HCA
10535 W. Missouri Avenue / 1841-1847 S. Fairburn Avenue

Honorable Commissioners:

I respectfully request a continuation of Item No. 7 on the March 26, 2026, agenda regarding the Density Bonus application for the above referenced property.

The project application has recently received a substantial volume of public comments raising significant concerns. Additional time is needed to thoroughly review and address these issues.

Thank you for your consideration.

Sincerely,



David Hanasab

Property Ownership Contact

822 S Robertson Boulevard, Suite 207

Los Angeles, CA 90035

DAY OF HEARING SUBMISSIONS



Department of City Planning

City Hall, 200 N. Spring Street, Room 272, Los Angeles, CA 90012

March 24, 2026

TO: City Planning Commission

FROM: Laura Frazin Steele, City Planner

TECHNICAL MODIFICATIONS TO THE STAFF RECOMMENDATION REPORT FOR CASE NO. CPC-2024-3381-DB-CDO-VHCA; 7354 N. BAIRD AVENUE

The following technical modifications need to be incorporated into the staff recommendation report to be considered at the City Planning Commission meeting of March 26, 2026 related to Item No. 5a on the meeting agenda.

Findings

- 1. The Incentive does not result in identifiable and actual cost reductions, consistent with CA GC Section 65915(k), to provide for affordable housing costs, as defined in California Health and Safety Code Section 50052.5, or for rents for the targeted units to be set as specified in CA GC Section ~~659154(c)~~ 65915(c).**

The applicant has requested herein a 100% decrease from all landscaping requirements to provide zero square feet of landscaping in lieu of the otherwise required landscaping pursuant to LAMC Sections 12.40 – 12.43 and 12.21 G. The applicant has also requested to deviate from the requirement to plant trees as a Waiver of Development Standard, which shall be discussed elsewhere herein. The applicant did not request to deviate from LAMC Section 12.21 C.1(g), which requires every front yard to be open and obstructed from ground to sky, and further requires “All portions of the required front yard of one-family dwellings, two-family dwellings, multiple dwellings or group dwellings, apartment houses, hotels, motels, apartment hotels and retirement hotels in the RE, RS, R1, RU, RZ, R2, RD, R3, RAS3, R4, RAS4, R5, or C Zones not used for necessary driveways and walkways, including decorative walkways, shall be used for planting, and shall not otherwise be paved.” However, had the applicant requested deviation from landscaping in the required front yard pursuant to LAMC Section 12.21 C.1(g), this requirement would have been dismissed as not needed. The required front yard for this project is waived herein, and so to require landscaping in an area that is not required to be provided is a circuitous and unnecessary requirement. Further, LAMC Section 12.21 C.1(g) requires the “...planted area in the RD, R3, RAS3, R4, RAS4, R5, or C Zones shall be planted in accordance with a landscape plan prepared by a licensed landscape architect, licensed architect, or landscape contractor to the satisfaction of the Department of City Planning. The planted area shall include at least one tree, which shall be at least 15 gallon in size and at least six feet in height at the time of planting, for each 500 square feet of planted area and shall be equipped with an automatic irrigation system, which shall be properly maintained.” This requirement is not applicable herein, as the project site is zoned R2.

4. The Development Standard associated with a request for a Waiver will not have the effect of physically precluding the construction of a development meeting the eligibility criteria described in LAMC Section 12.22 A.37(c) at the densities or with the Base Incentives and Additional Incentives permitted under this subdivision.

- **Tree Planting - A 100% reduction in the number of required trees to be planted on-site and in the public right-of-way to provide 0 trees in lieu of the trees required pursuant to LAMC Sections 12.40 - 12.43.** According to the Tree Disclosure Statement Form No. CP-4067 submitted by the applicant, the property does not contain any protected trees or shrubs and there are no street trees in the public right-of-way. Further, the applicant discloses that no trees or shrubs have been removed in the last 2 years. According to information provided by the applicant, two existing non-protected trees located on site will need to be removed to construct the proposed project.

As previously discussed herein, LAMC Section 12.21 G applies to multi-family residential dwelling units and not to Shared Housing Units. Therefore, the applicant's request to deviate from tree planting requirements as regulated by LAMC Section 12.21 G is not applicable and is dismissed. The request to waive tree requirements under LAMC Sections 12.40 – 12.43 is granted herein, as it will allow the developer to expand the building envelope and results in construction efficiencies that provide for affordable housing costs.

Additionally, as previously discussed herein, the applicant did not request to deviate from LAMC Section 12.21 C.1(g), which requires every front yard to be open and obstructed from ground to sky, and further requires "All portions of the required front yard of one-family dwellings, two-family dwellings, multiple dwellings or group dwellings, apartment houses, hotels, motels, apartment hotels and retirement hotels in the RE, RS, R1, RU, RZ, R2, RD, R3, RAS3, R4, RAS4, R5, or C Zones not used for necessary driveways and walkways, including decorative walkways, shall be used for planting, and shall not otherwise be paved." However, had the applicant requested deviation from landscaping in the required front yard pursuant to LAMC Section 12.21 C.1(g), this requirement would have been dismissed as not needed. The required front yard for this project is waived herein, and so to require landscaping in an area that is not required to be provided is a circuitous and unnecessary requirement. Further, LAMC Section 12.21 C.1(g) requires "...planted area in the RD, R3, RAS3, R4, RAS4, R5, or C Zones shall be planted in accordance with a landscape plan prepared by a licensed landscape architect, licensed architect, or landscape contractor to the satisfaction of the Department of City Planning. The planted area shall include at least one tree, which shall be at least 15 gallon in size and at least six feet in height at the time of planting, for each 500 square feet of planted area and shall be equipped with an automatic irrigation system, which shall be properly maintained." This requirement is not applicable herein, as the project site is zoned R2.



Department of City Planning

City Hall, 200 N. Spring Street, Room 272, Los Angeles, CA 90012

March 25, 2026

TO: City Planning Commission

FROM: Julissa Lopez-Hodoyan, Planning Assistant

**ADDITIONAL INFORMATION/TECHNICAL MODIFICATION/CORRECTION TO THE
STAFF RECOMMENDATION REPORT FOR CASE NO. CPC-2025-3079-DB-VHCA;
10535 MISSOURI; 1847 SOUTH FAIRBURN AVENUE**

The following technical modifications are to be incorporated into the staff recommendation report to be considered at the City Planning Commission meeting of March 26, 2026, related to Item No. 7 on the meeting agenda.

Transmitted herewith, are staff report with updated Table of Contents (Exhibit D) and the entirety of Exhibit D – Environmental Clearance which includes missing attachments referenced in the Exhibit D cover page, including: Transit Study Assessment with VMT Calculator, Air Quality Report and Noise Report to be considered at the City Planning Commission meeting of March 26, 2026, related to Item No. 7 on the meeting agenda.

The additional information does not modify the project description, conditions, findings, or staff's recommendation, but rather provides missing exhibits.



DEPARTMENT OF CITY PLANNING Recommendation Report

City Planning Commission

Date: March 26, 2026
Time: after 8:30 a.m.
Place: Van Nuys City Hall
Council Chambers, 2nd Floor
14410 Sylvan Street
Van Nuys, CA 91401

This meeting may be available virtually, in a hybrid format. The meeting's telephone number and access code number will be provided no later than 72 hours before the meeting on the meeting agenda published at <https://planning.lacity.org/about/commissions-boards-hearings> and/or by contacting cpc@lacity.org

Public Hearing: February 5, 2026

Appeal Status: Off-Menu Density Bonus Housing Incentives and Waivers are not appealable by any party.

Expiration Date: March 26, 2026

Multiple Approval: No

Case No.: CPC-2025-3079-DB-VHCA
CEQA No.: ENV-2025-3081-CE
Incidental Cases: N/A
Related Cases: N/A
Council No.: 5 – Young Yaroslavsky
Plan Area: West Los Angeles
Plan Overlay: West Los Angeles Transportation Improvement and Mitigation
Certified NC: Westside
GPLU: Medium Residential
Zone: R3-1-O
Applicant: David Hanasab,
1330 Early Bird Square,
LLC
Representative: Mathew Hayden,
Hayden Planning

PROJECT LOCATION: **10535 West Missouri Avenue / 1847 South Fairburn Avenue; 1841 South Fairburn Avenue**
(legally described as Lots 14-15, Block 128, Tract TR 5609)

PROPOSED PROJECT: The proposed project is the construction of a six-story, 73-foot-6-inch-tall residential apartment building with 39 dwelling units, including three (3) Very Low-Income units and three (3) Moderate Income units. The project will be approximately 50,060 square feet in floor area, with a Floor Area Ratio ("FAR") of 4.35:1. The project will provide 66 parking spaces at an at-grade and subterranean parking level. The site is currently improved with an existing duplex (Lot 14) and single-family dwelling (Lot 15), which will both be demolished. No (0) protected trees will be removed from the subject site; three (3) existing, non-protected trees will be removed from the site; there is one (1) existing street tree along the public right-of-way; no street trees will be removed; and the project involves grading of 6,600 cubic yards of soil.

REQUESTED ACTION: 1. Pursuant to California Environmental Quality Act (CEQA) Guidelines, Article 19, Section 15332 (Class 32), an Exemption from CEQA, and that there is no substantial evidence

demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies.

2. Pursuant to Los Angeles Municipal Code (LAMC) Section 12.22 A.25(g)(3), a Density Bonus/Affordable Housing Incentive Program Compliance Review to permit the construction of a Housing Development Project totaling 39 units, reserving three (3) units for Very Low Income Household and three (3) units for Moderate Income Household occupancy for a period of 99 years, with the following requested four (4) Off-Menu Incentives:
 - a. **Height.** An increase in building height, up to 73-foot 6-inch in lieu of the allowed 45 feet per the R3-1 Zone.
 - b. **Floor Area Ratio (FAR).** An up to 45% increase in FAR for a total FAR of 4.35:1 in lieu of the maximum FAR of 3:1.
 - c. **Yards.** A minimum northerly side yard of 7 feet in lieu of 9 feet, otherwise required per the R3-1 Zone.
 - d. **Yards.** A minimum southerly side yard of 7 feet in lieu of 9 feet, otherwise required per the R3-1 Zone
3. Pursuant to LAMC Section 12.22 A.25(g), the following one (1) Waiver of Development Standards:
 - a. **Open Space.** An up to 25% decrease in the required open space, allowing a minimum of 3,525 square feet of open space in lieu of the required 4,700 square feet of open space otherwise required by LAMC 12.21. G.2.

RECOMMENDED ACTIONS:

1. **Determine** that based on the whole of the administrative record, the project is exempt from the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines, Article 19, Section 15332 (Class 32 – Infill Development), and there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies;
2. **Approve**, pursuant to LAMC Section 12.22 A.25(g)(3), a **Density Bonus/Affordable Housing Incentive Program Compliance Review** to permit the construction of a Housing Development Project totaling 39 units, reserving three (3) units for Very Low Income and three (3) unit for Moderate Income Household for a period of 99 years, with the following requested four (4) **Off-Menu Incentives**:
 - a. An increase in building height, up to 73-foot 6-inch in lieu of the allowed 45 feet per the R3-1 Zone.
 - b. An up to 25% decrease in the required open space, allowing a minimum of 3,525 square feet of open space in lieu of the required 4,700 square feet of open space otherwise required by LAMC 12.21. G.2.
 - c. A minimum northerly side yard of 7 feet in lieu of 9 feet and a minimum southerly side yard of 7 feet in lieu of 9 feet, otherwise required per the R3-1 Zone.
 - d. A minimum southerly side yard of 7 feet in lieu of 9 feet, otherwise required per the R3-1 Zone.
3. **Approve**, pursuant to LAMC Section 12.22 A.25(g)(3), the following **one (1) Waiver of Development Standards**:

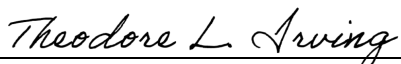
- a. An up to 45% increase in FAR for a total FAR of 4.35:1 in lieu of the maximum FAR of 3:1.

4. **Adopt** the attached Conditions and Findings.

VINCENT P. BERTONI, AICP
Director of Planning



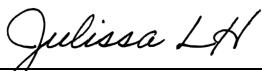
Theodore L. Irving, Principal City Planner

 for

Connie Chauv, Senior City Planner



Kyle Winston, City Planner



Julissa Lopez-Hodoyan, Planning Assistant
julissa.lopez-hodoyan@lacity.org
Telephone: (213) 978-1172

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

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PROJECT ANALYSIS

PROJECT SUMMARY

The proposed project is the construction of a six-story, 73-foot-6-inch-tall residential apartment building with 39 dwelling units (including three (3) Very Low-Income units and three (3) Moderate Income units). The project will be approximately 50,060 square feet in floor area with a Floor Area Ratio ("FAR") of 4.35:1. The primary pedestrian entrance is located along Missouri Avenue and will provide direct access to the lobby and mail room. Upper levels include residential units and nine (9) recreation rooms: two (2) on the Second through the Fifth Floor, and one (1) on the Sixth Floor. The project includes nine (9) one-bedroom units, 28 two-bedroom units, and one (1) three-bedroom unit. Residential amenities are provided in the form of recreation rooms, roof deck, and private balconies.

The project will provide 66 parking spaces in an at-grade and subterranean parking level, with one driveway accessed from Missouri Avenue. The project will also provide 34 long-term and three (3) short-term bicycle parking spaces.

The site is currently improved with one (1) one-story duplex, and one (1), one-story single-family dwelling which will be demolished. No (0) protected trees will be removed from the subject site; three (3) existing, non-protected trees will be removed from the site; there is one (1) street tree along the public right-of-way; no street trees will be removed; and the project involves grading of 6,600 cubic yards of soil.

BACKGROUND

Subject Property

The project site is located on the corner of Missouri Avenue and Fairview Avenue in the West Los Angeles Community Plan. The property is slightly higher in elevation than the adjacent right-of-way, and is a rectangular site, comprised of two (2) lots totaling approximately 15,127.11 square feet (0.35 acres) of lot area, with approximately 108 feet of frontage along the westerly side of Fairburn Avenue, and with a depth of approximately 140-feet frontage along the northerly side of Missouri Avenue. The site has a 5-foot utility easement in the rear yard, per the Topographic Survey, by M&G Civil Engineering and Land Surveying, dated March 29, 2024. The site is currently improved with one (1) one-story duplex, and one (1), one-story single-family dwelling which will be demolished. The project site is located in the Methane Zone, BOE Special Grading Area (BOE Basic Grid Map A-13372), and is within .28 km (.17 miles) of the Santa Monica Fault Zone. This site, however, is not located within the Alquist-Priolo Fault Zone, Liquefaction Zone, Landslide Area, or Very High Fire Severity Zone.

Zoning and Land Use Designation

The project site is in the West Los Angeles Community Plan, and is designated for Medium Residential land uses, with corresponding zones of R3 and R3(PV). The site is zoned R3-1 which is consistent with the land use designation in the General Plan. The R3-1 Zone and designation allow for a base density of one dwelling unit per 800 square feet of lot area and a 3:1 Floor Area Ratio (FAR). The site is subject to Height District No. 1 in the R3 Zone which allows for a maximum building height of 45 feet. The project site is located within the West Los Angeles Transportation Improvement and Mitigation Specific Plan ("WLA TIMP", OrdinanceNos. 186,105 and 186,108). The Project is subject to Department of Transportation clearance of the WLA TIMP prior to the issue of building permits.

Surrounding Uses

The project site is an infill site in an urbanized area surrounded primarily by multi-family and single-family residential. Properties to the north are zoned R3-1-O, C2-1-VL-O and [Q]C2-1VL-O and include one to five story, single and multi-family residential buildings. Properties to the east are zoned R3-1-O, R1-1-O and RD1.5-1-O and are developed with one- to four-story single and multi-family residential buildings. Properties to the south are zoned R1-1-O and are developed with one-story single-family dwellings.

Streets and Circulation

Missouri Avenue, abutting the property to the south, is designated by the Mobility Plan as a Local Street – Standard, with a designated right-of-way width of 60 feet and roadway width of 36 feet, and is currently dedicated to a 60-foot right-of-way width and approximately 30-foot roadway width, with a curb, gutter, and sidewalk.

Fairview Avenue, abutting the property to the east, is designated by the Mobility Plan as a Local Street – Standard, with a designated right-of-way width of 60 feet and roadway width of 36 feet, and is currently dedicated to a 60-foot right-of-way width and approximately 36-foot roadway width, with a curb, gutter, and sidewalk.

Public Transit

The subject site is within 500 feet of the Santa Monica / Century Park West bus stop served by the Metro Rapid bus line 4 and 28 of the Los Angeles County Metropolitan Transportation Authority (“Metro”), which constitutes a Major Transit Stop.

Relevant Cases and Building Permits**Subject Site:**

There are no cases identified on the subject site. The building permit numbers associated with this proposal are: 25010-10000-00610, 25010-10001-00610, 25030-10000-07255 and 25020-10000-02255.

Surrounding Sites:

There are no relevant cases identified to be within 500 feet of the subject site.

Affordable Units:

The project was filed with a proposed affordable unit mix of 3 units for Very Low Income Households and three (3) units for Moderate Income Households and the proposal aligns with the requirements in the Replacement Unit Determination (RUD) letter, dated October 3, 2025.

REQUESTED ACTIONS**Density Bonus / Affordable Housing Incentives Program**

In accordance with California State Law under Government Code Section 65915 (including Senate Bill 1818, and Assembly Bills 2280, 2222, and 2556), the applicant is proposing to utilize LAMC Section 12.22 A.25 (Affordable Housing Incentives – Density Bonus) to set aside a minimum of three (3) Very Low-Income and three (3) Moderate Income Household occupancy for a period of 99 years. Because the applicant is providing 15 percent (3 units) of base dwelling units (19 units) to be affordable for Very Low Income household occupancy, and 15 percent (3 units) of base dwelling units (19 units) for Moderate Income household occupancy, the project is eligible for four (4) Density Bonus Incentives. The R3-1 Zone and designation allow for a base density of one dwelling unit per 800 square feet of lot area and a 3:1 Floor Area Ratio (FAR). Per the Topographic Survey, by M&G Civil Engineering and Land Surveying, dated March 29, 2024, the subject lot totals 15,127.11 square feet, for a maximum base density of 19 units. The Los Angeles Municipal Code allows 18 units by-right, however, the Density Bonus / Affordable Housing Incentives Program round base density up to the next whole number, which is 19.

Off-Menu Incentives

As a result of setting aside 30 percent (dwelling units) of the base 19 dwelling units as Restricted Affordable Units for Very Low Income (15 percent) and Moderate Income Households (15 percent), the applicant requests four (4) Off-Menu Density Bonus Incentives, as follows:

- a. An increase in building height, up to 73-foot 6-inch in lieu of the allowed 45 feet per the R3-1 Zone.
- b. An up to 45% increase in FAR for a total FAR of 4.35:1 in lieu of the maximum FAR of 3:1.
- c. A minimum northerly side yard of 7 feet in lieu of 9 feet, otherwise required per the R3-1 Zone.
- d. A minimum southerly side yard of 7 feet in lieu of 9 feet, otherwise required per the R3-1 Zone.

Waivers of Development Standards

As mentioned above, a project that provides a minimum of 15 percent of its base units for Very Low Income Households qualifies for three (3) Incentives, and a project that provides 15% of Moderate Income Households qualifies for one (1) Incentive, but may request other “waiver[s] or reduction[s] of development standards that will have the effect of physically precluding the construction of a development meeting the [affordable set-aside percentage] criteria of subdivision (b) at the densities or with the concessions or incentives permitted under [State Density Bonus Law]” (Government Code Section 65915(e)(1)), in conjunction with a Density Bonus Project. Given that the project is utilizing all four (4) Density Bonus Incentives, the applicant requests four (4) Waivers of Development Standards, as follows:

- a. An up to 25% decrease in the required open space, allowing a minimum of 3,525 square feet of open space in lieu of the required 4,700 square feet of open space otherwise required by LAMC 12.21. G.2.

Housing Replacement Determination

The Los Angeles Housing Department (LAHD) has determined, per the Housing Crisis Act of 2019 (SB 8) Determination, dated October 3, 2025, that the property has been used for

residential purposes with three (3) units existing on the property, and that two (2) units are subject to replacement as affordable “Protected Units”. Two (2) units are required as Affordable Replacement Units, per the HUD Comprehensive Housing Affordability Strategy (CHAS) database (one (1) Very Low income, and one (1) Low income).

The project shall be required to comply with the Replacement Unit Determination (RUD) letter, dated October 3, 2025, to the satisfaction of LAHD. The most restrictive affordability levels shall be followed in the covenant and the project will be conditioned to require the income requirements in the RUD letter be met.

CEQA

Pursuant to California Environmental Quality Act (CEQA) Guidelines, Article 19, Section 15332 (Class 32) and Section 21084 of the California Public Resources Code, an Exemption from CEQA, and that there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies.

ISSUES

Public Hearing

The public hearing was held on February 5, 2026, at approximately 9:30 a.m. Due to concerns over COVID-19, the Public Hearing was conducted in a virtual format. The public hearing was attended by the applicant’s representative (Matthew Hayden) and approximately 55 other members from the community. There were 19 speakers who provided comments at the hearing, which can be summarized as follows:

Height / Scale / Setbacks / Open Space

Staff received several comment letters and public comments at the hearing expressing concerns regarding the impact to the residents due to the proposed building height and scale, the proposed setbacks, unit sizes, open space provision, and the impact to the existing vehicular circulation and parking. Concern was expressed over the quality of life for neighbors during construction activities, especially during the weekend, and potential noise generated by the rooftop access / amenity space.

Project Feasibility

In addition, concerns were raised regarding the viability of the project proposal in regards to applicable laws related to new projects: a) compliance with the Los Angeles Municipal Code (LAMC), b) with the available Density Bonus Program, and c) with the California Environmental Quality Act (CEQA), in particular, in regards to the use of CEQA Categorical Exemption 32.

Correspondence

In addition, correspondence was received by approximately five members of the public, and approximately 47 emails, including a Petition with 26 signatures, a letter from the Homeowner’s Association, and a Letter from the Westside Neighborhood Council requesting the project be properly assessed against current regulations and / or with requests to stop the project.

CONCLUSION

Based on the information submitted to the record, and the surrounding uses and zones, staff recommends that the City Planning Commission approve the project, as recommended, subject

to the Conditions of Approval. The project will redevelop an underutilized site with a new multi-family residential project resulting in a net increase of 39 dwelling units, including three (3) Very Low-Income units and three (3) Moderate Income units.

CONDITIONS OF APPROVAL

Density Bonus Conditions

1. **Site Development.** The project shall be in substantial conformance with the plans and materials submitted by the Applicant, including the proposed building design elements and materials, stamped Exhibit "A," with a date of February 26, 2026, attached to the subject case file. No change to the plans shall be made without prior review by the Department of City Planning, Project Planning Bureau, and written approval by the Director of Planning. Each change shall be identified and justified in writing. Minor deviations may be allowed in order to comply with the provisions of the LAMC or the project conditions.
2. **Residential Density.** The project shall be limited to a maximum density of 39 multi-family residential dwelling units including On-Site Restricted Affordable Units.
3. **On-Site Restricted Affordable Units.** Three (3) units shall be reserved for Very Low Income and three (3) units for Moderate Income Households, as defined by the California Government Code Section 65915 and by the Los Angeles Housing Department (LAHD). In the event the SB 8 Replacement Unit condition requires additional affordable units or more restrictive affordability levels, the most restrictive requirements shall prevail.
4. **SB 8 Replacement Units (California Government Code Section 66300 et seq.)** The project shall be required to comply with the Replacement Unit Determination (RUD) letter, October 3, 2025, to the satisfaction of LAHD. The most restrictive affordability levels shall be followed in the covenant. In the event the On-site Restricted Affordable Units condition requires additional affordable units or more restrictive affordability levels, the most restrictive requirements shall prevail.
5. **Changes in On-Site Restricted Units.** Deviations that increase the number of restricted affordable units or that change the composition of units or change parking numbers shall be consistent with LAMC Section 12.22 A.25 (a-d).
6. **Housing Requirements.** Prior to the issuance of a building permit, the owner shall execute a covenant to the satisfaction of the Los Angeles Housing Department (LAHD) to make three (3) units available to Very Low Income and three (3) units for Moderate Income Households, or equal to 30 percent of the project's total base residential density allowed, for sale or rental, as determined to be affordable to such households by LAHD for a period of 99 years. In the event the applicant reduces the proposed density of the project, the number of required reserved on-site Restricted Units may be adjusted, consistent with LAMC Section 12.22 A.25, to the satisfaction of LAHD, and in consideration of the project's Replacement Unit Determination. Enforcement of the terms of said covenant shall be the responsibility of LAHD. The applicant shall submit a copy of the recorded covenant to the Department of City Planning for inclusion in this file. The project shall comply with the Guidelines for the Affordable Housing Incentives Program adopted by the City Planning Commission and with any monitoring requirements established by the LAHD.

Unless otherwise required by state or federal law, the project shall provide an onsite building manager's unit, which the owner shall designate in the covenant. The Owner may not use an affordable restricted unit for the manager's unit.

7. **Rent Stabilization Ordinance (RSO).** Prior to the issuance of a Certificate of Occupancy, the owner shall obtain approval from LAHD regarding replacement of affordable units, provision of RSO Units, and qualification for the Exemption from the Rent Stabilization Ordinance with Replacement Affordable Units in compliance with Ordinance No. 184,873. In

order for all the new units to be exempt from the Rent Stabilization Ordinance, the applicant will need to either replace all withdrawn RSO Units with affordable units on a one-for-one basis or provide at least 20 percent of the total number of newly constructed rental units as affordable, whichever results in the greater number. The executed and recorded covenant and agreement submitted and approved by LAHD shall be provided to City Planning for inclusion in the case file.

8. **Automobile Parking.** Pursuant to California Government Code Section 65915(p)(3) and Assembly Bill 2097, the project shall be allowed to provide a minimum of zero parking spaces. The project is providing 66 parking spaces, as shown in Exhibit "A".
9. **Height (Incentive).** A 73-foot 6-inch maximum building height as shown in Exhibit "A".
10. **Setbacks (Incentive).** The project shall have a minimum 7-foot northerly side yard setback, as shown in Exhibit "A".
11. **Setbacks (Incentive).** The project shall have a minimum 7-foot southerly side yard setback, as shown in Exhibit "A".
12. **Open Space (Incentive).** A minimum of 3,525 square feet of open space shall be permitted per Exhibit "A" in lieu of the 4,700 square feet otherwise required.
13. **Floor Area Ratio (FAR) (Waiver).** The project total Floor Area shall be limited to 50,060 square feet or 4.35:1 FAR per Exhibit "A".
14. **Bicycle Parking.** Bicycle parking shall be provided consistent with LAMC Section 12.21 A.16. The project shall provide a minimum of 34 long-term and three (3) short-term bicycle parking spaces total, as shown in Exhibit "A".

Administrative Conditions

15. **Final Plans.** Prior to the issuance of any building permits for the project by the Department of Building and Safety, the applicant shall submit all final construction plans that are awaiting issuance of a building permit by the Department of Building and Safety for final review and approval by the Department of City Planning. All plans that are awaiting issuance of a building permit by the Department of Building and Safety shall be stamped by Department of City Planning staff "Plans Approved". A copy of the Plans Approved, supplied by the applicant, shall be retained in the subject case file.
16. **Notations on Plans.** Plans submitted to the Department of Building and Safety, for the purpose of processing a building permit application shall include all of the Conditions of Approval, herein attached, as a cover sheet and shall include any modifications or notations required herein.
17. **Approval, Verification, and Submittals.** Copies of any approvals, guarantees or verification of consultations, review of approval, plans, etc., as may be required by the subject conditions, shall be provided to the Department of City Planning prior to clearance of any building permits, for placement in the subject file.
18. **Code Compliance.** Use, area, height, and yard regulations of the zone classification of the subject property shall be complied with, except where granted conditions differ herein.

19. **Department of Building and Safety.** The granting of this determination by the Director of Planning does not in any way indicate full compliance with applicable provisions of the Los Angeles Municipal Code Chapter IX (Building Code). Any corrections and/or modifications to plans made subsequent to this determination by a Department of Building and Safety Plan Check Engineer that affect any part of the exterior design or appearance of the project as approved by the Director, and which are deemed necessary by the Department of Building and Safety for Building Code compliance, shall require a referral of the revised plans back to the Department of City Planning for additional review and sign-off prior to the issuance of any permit in connection with those plans.
20. **Enforcement.** Compliance with these conditions and the intent of these conditions shall be to the satisfaction of the Department of City Planning.
21. **Recording Covenant.** Prior to the issuance of any permits relative to this matter, a covenant acknowledging and agreeing to comply with all the terms and conditions established herein shall be recorded in the County Recorder's Office. The agreement (standard master covenant and agreement form CP-6770) shall run with the land and shall be binding on any subsequent owners, heirs or assigns. The agreement with the conditions attached must be submitted to the Development Services Center for approval before being recorded. After recordation, a certified copy bearing the Recorder's number and date shall be provided to the Development Services Center at the time of Condition Clearance for attachment to the subject case file.

22. Indemnification and Reimbursement of Litigation Costs.

Applicant shall do all of the following:

- (i) Defend, indemnify and hold harmless the City from any and all actions against the City relating to or arising out of, in whole or in part, the City's processing and approval of this entitlement, including but not limited to, an action to attack, challenge, set aside, void, or otherwise modify or annul the approval of the entitlement, the environmental review of the entitlement, or the approval of subsequent permit decisions, or to claim personal property damage, including from inverse condemnation or any other constitutional claim.
- (ii) Reimburse the City for any and all costs incurred in defense of an action related to or arising out of, in whole or in part, the City's processing and approval of the entitlement, including but not limited to payment of all court costs and attorney's fees, costs of any judgments or awards against the City (including an award of attorney's fees), damages, and/or settlement costs.
- (iii) Submit an initial deposit for the City's litigation costs to the City within 10 days' notice of the City tendering defense to the Applicant and requesting a deposit. The initial deposit shall be in an amount set by the City Attorney's Office, in its sole discretion, based on the nature and scope of action, but in no event shall the initial deposit be less than \$50,000. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).
- (iv) Submit supplemental deposits upon notice by the City. Supplemental deposits may be required in an increased amount from the initial deposit if found necessary by the City to protect the City's interests. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).
- (v) If the City determines it necessary to protect the City's interest, execute an indemnity and reimbursement agreement with the City under terms consistent with the requirements of this condition.

The City shall notify the applicant within a reasonable period of time of its receipt of any action and the City shall cooperate in the defense. If the City fails to notify the applicant of any claim, action, or proceeding in a reasonable time, or if the City fails to reasonably cooperate in the defense, the applicant shall not thereafter be responsible to defend, indemnify or hold harmless the City.

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

For purposes of this condition, the following definitions apply:

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

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

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

FINDINGS

DENSITY BONUS/AFFORDABLE HOUSING INCENTIVES COMPLIANCE FINDINGS

1. **Government Code Section 65915 and LAMC Section 12.22 A.25 state that the Commission shall approve a density bonus and requested incentive(s) unless the Commission finds that:**

- a. **The incentives do not result in identifiable and actual cost reductions to provide for affordable housing costs as defined in California Health and Safety Code Section 50052.5 or Section 50053 for rents for the affordable units.**

The record does not contain substantial evidence that would allow the City Planning Commission to make a finding that the requested off-menu incentives do not result in actual and identifiable cost reductions to provide for affordable housing costs per State Law. The California Health & Safety Code Sections 50052.5 and 50053 define formulas for calculating affordable housing costs for Very Low, Low, and Moderate Income Households. Section 50052.5 addresses owner-occupied housing and Section 50053 addresses rental households. Affordable housing costs are a calculation of residential rent or ownership pricing not to exceed 25 percent gross income based on area median income thresholds dependent on affordability levels.

Based on the set-aside of 15 percent of base units for Very Low Income households, the applicant is entitled to three (3) Incentives under both the Government Code and LAMC; and based on the set-aside of 15 percent of base units for Moderate Income households, the applicant is entitled to one additional (1) Incentive under both the Government Code and LAMC. Therefore, the four (4) Off-Menu requests qualify as the proposed development's Incentives. The remaining requests must be processed as Waivers of Development Standards.

- a. An increase in building height, up to 73-foot 6-inch in lieu of the allowed 45 feet per the R3-1 Zone.
- b. An up to 45% increase in FAR for a total FAR of 4.35:1 in lieu of the maximum FAR of 3:1.
- c. A minimum northerly side yard of 7 feet in lieu of 9 feet, otherwise required per the R3-1 Zone.
- d. A minimum southerly side yard of 7 feet in lieu of 9 feet, otherwise required per the R3-1 Zone.

Height: The project is subject to Height District No. 1, which limits height to 45 feet. The requested height incentive allows an increase of 28-feet 6-inches in building height, equal to a maximum building height of 73-feet 6-inches. Although the underlying zone does not limit the number of stories, the project is limited by building height. Utilization of the height incentive enables the construction of two and half additional levels, and thus facilitates the addition of at least 16 units. The additional units support the applicant's decision to

reserve three (3) units for Very Low Income Households and three (3) units for Moderate Income Households. The requested Off-Menu Incentive will allow the developer to expand the building envelope so the additional units can be constructed, and the overall space dedicated to residential uses is increased.

FAR: The subject site is zoned R3-1 which allows a base FAR of 3:1 per the LAMC. The applicant has requested an FAR of 4.35:1 in lieu of the maximum 3:1 through an Off-Menu Density Bonus Incentive as allowed by LAMC 12.22 A.25, for a maximum floor area of 50,060 square feet. The additional floor area is requested to accommodate more units, including one-bedroom units. The project includes nine (9) one-bedroom units, 28 two-bedroom units, and one (1) three-bedroom unit. The requested increase in FAR will allow approximately 15,536 square feet of additional floor area and will enable the construction of affordable units. As set forth on Sheets T-1.0, T-1.3, T-1.4 and A-2.2 through A-2.6 of the project plans, the project's upper residential levels (Second Floor through Sixth Floor) would each have floor plates of 11,508 square feet with approximately 8 units at each level. These larger floor plates would not be achievable under the 3:1 base FAR and enable the project to construct the unit mix above. Without the waiver of development standards to permit additional floor area, the project would need to remove the uppermost two (2) floors containing 17 units total. The ability to develop a greater number of units will increase the revenues from the market-rate units, which will lower the marginal cost of developing the affordable units. The additional floor area will allow certain fixed costs involved in the construction of new residential units to be spread over more floor area thereby reducing the per square foot build cost of the development. The requested incentive will allow the developer to expand the building envelope so the additional units can be constructed, and the overall space dedicated to residential uses is increased. Therefore, the FAR incentive will result in identifiable and actual cost reductions to provide for affordable housing costs.

FAR by-right	Buildable Lot Area (square feet)	Base Floor Area (square feet)
3:1	11,508	$11,508 \times 3 = \mathbf{34,524}$

FAR Requested	Requested Floor Area (square feet)	Additional Floor Area (square feet)
4.35:1	$11,508 \times 4.35 = 50,060$	$50,060 - 34,524 = \mathbf{15,536}$

Side Yards: The Los Angeles Municipal Code requires the R3-1 Zone, a 5-foot setback at ground level and an additional foot (1) for each story above the second story. The project is proposing a six-story building, therefore, the four floors above the second would require a 4-foot increase in setback width, in addition to the required 5-feet, totaling 9-feet for the required side setbacks. The project has parking on the ground floor, and residential dwelling units and residential common areas on upper levels beginning on the Second Floor. Therefore, the project would be required to provide a 9-foot side yard setback along the northerly property line, and a 9-foot side yard setback along the

southerly property line. The applicant has requested to provide a 7-foot northerly side yard and 7-foot southerly side yard setback through an Off-Menu Density Bonus Incentive as allowed by LAMC 12.22 A.25. The request for the side yard reduction is needed to construct the number of units that the requested density bonus allows. Provision of 7-foot side yard setback along the northerly property line, along the approximately 107-foot 6-inch building length accounts for an additional building area of approximately 430 square feet per floor, totaling approximately 1,720 square feet across the upper four floors. Similarly, provision of a 7-foot side yard along the southerly property line, along the approximately 107-foot 6-inch building length accounts for an additional building area of approximately 430 square feet per floor, totaling approximately 1,720 square feet across the upper four floors. The northerly and southerly yards would account for a total of 3,400 square feet across the upper four floors. As shown on Sheet T-1.0, and A-2.2 through A-2.6 of the project plans, the project provides a unit mix with unit sizes ranging from 613 square feet to 1,449 square feet. Without the side yard incentives, the total unit count would be reduced by approximately 1 to 3 units and would physically preclude the construction of the development and the affordable units. Therefore, provision of the required 9-foot northerly side yard and 9-foot southerly side yard setback would physically preclude construction of the project as proposed.

- b. The Incentive will have specific adverse impact upon public health and safety or on any real property that is listed in the California Register of Historical Resources and for which there is no feasible method to satisfactorily mitigate or avoid the specific adverse impact without rendering the development unaffordable to Very Low, Low and Moderate Income households. Inconsistency with the zoning ordinance or the general plan land use designation shall not constitute a specific, adverse impact upon the public health or safety (Government Code Section 65915(d)(1)(B) and 65589.5(d)).**

There is no evidence in the record that the proposed density bonus incentive(s) will have a specific adverse impact. A “specific adverse impact” is defined as, “a significant, quantifiable, direct and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete” (LAMC Section 12.22.A.25(b)).

The project does not involve a contributing structure in a designated Historic Preservation Overlay Zone or on the City of Los Angeles list of Historical-Cultural Monuments. The project is not located on a substandard street in a Hillside area or a Very High Fire Hazard Severity Zone. There is no evidence in the record which identifies a written objective health and safety standard that has been exceeded or violated. There is also no substantial evidence that the project’s proposed incentives will have a specific adverse impact on public health and safety, or on property listed in the California Register of Historic Resources. Based on the above, there is no basis to deny the requested incentives.

c. The incentives are contrary to state or federal laws.

There is no evidence in the record that the proposed incentives are contrary to state or federal law.

Following is a delineation of the findings related to the request for three (3) Waivers of Development Standards, pursuant to Government Code Section 65915.

2. Government Code Section 65915 and LAMC Section 12.22 A.25 state that the Commission shall approve a density bonus and requested Waiver of Development Standard(s) unless the Commission finds that:

a. The waivers or reductions are contrary to state or federal laws.

There is no evidence in the record that the proposed incentives are contrary to state or federal law.

A project that provides a minimum of 15 percent of its base units for Very Low Income Households qualifies for three (3) Incentives, and a project that provides 15% of Moderate Income Households qualifies for one additional (1) Incentive, but may request other “waiver[s] or reduction[s] of development standards that will have the effect of physically precluding the construction of a development meeting the [affordable set-aside percentage] criteria of subdivision (b) at the densities or with the concessions or incentives permitted under [State Density Bonus Law]” (Government Code Section 65915(e)(1)).

Therefore, the requests for the following are recommended as Waivers of Development Standards. Without the below Waivers, the existing development standards would preclude development of the proposed density bonus units and project amenities:

Residential Open Space: LAMC Section 12.21 G requires 100 square feet of usable open space per dwelling unit with less than 3 habitable rooms, and 125 square feet of usable open space per dwelling unit with 3 habitable rooms. For the proposed project with nine (9) one-bedroom units, 28 two-bedroom units, and one (1) three-bedroom unit, a total of 4,700 square feet of open space would be required. Strict compliance with the open space requirements would have the effect of physically precluding construction of a development providing 39 dwelling units, of which three (3) units will be set aside for Very Low-Income households and three (3) will be set aside for Moderate Income households. The applicant has requested a 25 percent reduction to allow 3,525 square feet of open space through a Waiver of Development Standard as allowed by LAMC 12.22 A.25. Without the incentive to reduce the minimum usable open space required to 3,525 square feet, the project would need to provide an additional 1,175 square feet of common or private open space on-site. As shown on Sheet T-1.0, and A-2.2 through A-2.6 of the project plans, the project provides a unit mix with unit sizes ranging from 613 square feet to 1,720 square feet. Compliance with the minimum usable open space provision would require the removal of floor area that could otherwise be dedicated to the number, configuration, and livability of affordable housing units. Specifically, the project would not only need to comply with the total amount of usable open space requirements, but also the design, dimension, and area requirements set forth in LAMC Section

12.21 G. Common open space would need to be at least 15 feet in width on all sides, have a minimum area of 400 square feet, and be open to sky. The project would lose the floor area of the development in order to meet all of these additional requirements for common open space.

These waivers support the applicant's decision to set aside the specified number of dwelling units for Very Low or Moderate Income Households for 99 years.

- b. The Waiver will have specific adverse impact upon public health and safety or on any real property that is listed in the California Register of Historical Resources and for which there is no feasible method to satisfactorily mitigate or avoid the specific adverse impact without rendering the development unaffordable to Very Low, Low and Moderate Income households. Inconsistency with the zoning ordinance or the general plan land use designation shall not constitute a specific, adverse impact upon the public health or safety.***

There is no evidence in the record that the proposed density bonus Waivers will have a specific adverse impact. A "specific adverse impact" is defined as, "a significant, quantifiable, direct and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete" (LAMC Section 12.22.A.25(b)).

The project does not involve a contributing structure in a designated Historic Preservation Overlay Zone or on the City of Los Angeles list of Historical-Cultural Monuments. The project is not located on a substandard street in a Hillside area or a Very High Fire Hazard Severity Zone. There is no evidence in the record which identifies a written objective health and safety standard that has been exceeded or violated. There is also no substantial evidence that the project's proposed incentives will have a specific adverse impact on public health and safety, or on property listed in the California Register of Historic Resources. Based on the above, there is no basis to deny the requested incentives.

CEQA Findings

As the designee of the Director of Planning, I have determined, based on the whole of the administrative record, that the Project is exempt from the California Environmental Quality Act ("CEQA") pursuant to CEQA Guidelines, Article 19, Section 15332 (Class 32), and there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies.

The proposed project is the construction of a six-story, 73-foot-6-inch-tall residential apartment building with 39 dwelling units (including three (3) Very Low-Income units and three (3) Moderate Income units). The project will be approximately 50,060 square feet in floor area with a Floor Area Ratio ("FAR") of 4.35:1. The primary pedestrian entrance is located along Missouri Avenue and will provide direct access to the lobby and mail room. Upper levels include residential units and nine (9) recreation rooms: two (2) on the Second through the Fifth Floor, and one (1) on the Sixth Floor. The project includes nine (9) one-bedroom units, 28 two-bedroom units, and one (1) three-bedroom unit.

Residential amenities are provided in the form of recreation rooms, roof deck, and private balconies. The project will provide 66 parking spaces in an at-grade and subterranean parking level, with one driveway accessed from Missouri Avenue. The project will also provide 34 long-term and three (3) short-term bicycle parking spaces.

The site is currently improved with one (1) one-story duplex, and one (1), one-story single-family dwelling which will be demolished. No (0) protected trees will be removed from the subject site; three (3) existing, non-protected trees will be removed from the site; there is one (1) street trees along the public right-of-way; no street trees will be removed; and the project involves grading of 6,600 cubic yards of soil.

A project qualifies for a Class 32 Categorical Exemption if it is developed on an infill site and meets the following criteria:

- a. The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with the applicable zoning designation and regulations.**

The project site is located within the West Los Angeles Community Plan area. The site is zoned R3-1 and has a General Plan Land Use Designation of Medium Residential. The R3-1 Zone allows for a base density of one dwelling unit per 800 square feet of lot area. Height District 1 in the R3 Zone, allows for a height of 45-feet. The project site is in the West Los Angeles Transportation Improvement and Mitigation Specific Plan (WLA TIMP, Ordinance 186,105 and 186,108). The Project is subject to Department of Transportation clearance of the WLA TIMP.

- b. The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.**

The property is a rectangular site, comprised of two (2) lots totaling approximately 15,127.11 square feet (0.35 acres) of lot area, and is wholly within the City of Los Angeles. Lots adjacent to the subject site are developed with urban uses. The project site is an infill site surrounded by residential uses. The project site is an infill site in an urbanized area surrounded primarily by multi-family and single-family residential. Properties to the north are zoned R3-1-O, C2-1-VL-O and [Q]C2-1VL-O and include one to five story, single and multi-family residential buildings. Properties to the east are zoned R3-1-O, R1-1-O and RD1.5-1-O and are developed with one- to four-story single and multi-family residential buildings. Properties to the south are zoned R1-1-O and are developed with one-story single-family dwellings. The surrounding neighborhood is fully developed with streets, sidewalk, gutter, sewer, and street trees.

- c. The project site has no value as habitat for endangered, rare or threatened species.**

The subject site is currently developed with one duplex and one single-family residential structure proposed to be demolished. Further, the subject site is surrounded by existing residential properties and development. Prior to any work on the adjacent public right-of-way, the applicant will be required to obtain approved plans from the Department of Public Works. As there currently is no approved right-of-way improvement plan and for purposes of

conservative analysis under CEQA, Planning has analyzed the worst-case potential for removal of all street trees. Note that street trees and protected trees shall not be removed without prior approval of the Board of Public Works/Urban Forestry (BPW) under LAMC Sections 62.161 - 62.171. At the time of preparation of this environmental document, no approvals have been given for any tree removals on-site or in the right-of-way by BPW. The City has required a Tree Report to identify all protected trees/shrubs on the project site and all street trees in the adjacent public right-of-way. A Tree Disclosure Statement prepared by the applicant, dated May 19, 2025, indicated that there are no protected tree or shrub species on the site, or adjacent to the site. There are currently three (3) existing, Non-Protected trees on the project site proposed to be removed. There is one (1) existing tree growing in the adjacent public-right-of-way that will remain (*Ulmus parviflora*), as shown on the Landscape Architecture drawings prepared by MJS Landscape. No street trees will be removed. Therefore, the subject site is not, and has no value as a habitat for endangered, rare, or threatened species.

d. Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.

The project will be subject to Regulatory Compliance Measures (RCMs), which require compliance with the City of Los Angeles Noise Ordinance, pollutant discharge, dewatering, stormwater mitigations; and Best Management Practices for stormwater runoff. The project does not exceed the threshold criteria established by the LADOT for preparing a traffic study. The City of Los Angeles' Vehicle Miles Traveled (VMT) calculator dated May 9, 2025, indicated that the number of daily vehicle trips will be 148 which is under the threshold of 250 or more daily vehicle trips to require VMT analysis. As such, the project will not have any significant impacts to traffic. In regards to Air Quality, interim thresholds were developed by the Los Angeles Department of City Planning staff based on California Emissions Estimator Model (CalEEMod) runs relying on reasonable assumptions, consulting with AQMD staff, and surveying published air quality studies for which criteria air pollutants did not exceed the established SCAQMD construction and operational thresholds. RCMs also include the submittal of the Geology and Soils Report to the Department of Building and Safety ("DBS"); the RCMs require that design and construction of the building must conform to the California Building Code, and grading on site shall comply with the City's Landform Grading Manual, as approved by the Department of Building and Safety Grading Division.

e. The site can be adequately served by all required utilities and public services.

The project site is currently developed, surrounded by urban uses, served by existing infrastructure, and is consistent with the General Plan. The subject site will be adequately served by all public utilities and services given that the construction of a six-story, residential building with 39 dwelling units, is in a highly urbanized area with existing utilities and public services, and is on parcels zoned for such a use and density. In addition, compliance with the LA Sanitation, Wastewater Engineering Services Division (WESD) must be followed. The WESD details conditions of approval for the proposed project (letter dated February 4, 2026), which include Wastewater Requirements,

Stormwater Requirements, Groundwater Dewatering Reuse Options, and Solid Resource Requirements.

Therefore, the Project meets the qualifications of the Class 32 Exemption.

Exceptions Narrative for Class 32 Categorical Exemption

There are five (5) Exceptions which must be considered in order to find a project exempt under Class 32:

- a. Cumulative Impacts.** *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.*

Staff have identified zero comparable projects that have either filed or were granted approval for land use entitlements within a 500-foot radius of the subject site.

The project will result in less than significant impacts related to traffic, noise, and air quality, as shown above. The VMT Calculator dated May 9, 2025, indicates that the project would generate a net increase of 148 daily vehicle trips, which is less than the threshold of 250 daily trips that would otherwise require a Vehicle Miles Traveled (VMT) analysis. There is no evidence to conclude that significant impacts will occur based on past project approvals or that the proposed Project's impacts are cumulatively considerable when evaluating any cumulative impacts associated with construction noise and transportation/traffic in the surrounding area. Therefore, in conjunction with citywide RCMs and compliance with other applicable regulations, no foreseeable cumulative impacts are expected.

- b. Significant Effect Due to Unusual Circumstances.** *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 project proposes a multi-family residential building in an area zoned and designated for such development. The project proposes the demolition of the existing duplex and one single-family residence, and the construction of a six-story, 73-foot-6-inch-tall residential apartment building with 39 dwelling units (including three (3) Very Low-Income units and three (3) Moderate Income units). The project will be approximately 50,060 square feet in floor area with a Floor Area Ratio ("FAR") of 4.35:1. The subject site, of two (2) lots totaling approximately 15,127.11, in the R3-1 Zone, is of a similar size and slope to nearby properties. All surrounding properties are developed with mostly residential buildings. The Floor Area, Density, Height, Yards, and Open Space of the proposed project are consistent with the Zone and Density Bonus program and incentives. The site is currently improved with one (1) one-story duplex, and one (1), one-story single-family dwelling which will be demolished. The project site is located in the Methane Zone, BOE Special Grading Area (BOE Basic Grid Map A-13372), and is within .28 km (.17 miles) of the Santa Monica Fault Zone. This site, however, is not located within the Alquist-Priolo Fault Zone, Liquefaction Zone, Landslide Area, or Very High Fire Severity Zone. There are no known designated historic resources or cultural monuments

on the subject site. There are no known unusual circumstances which may lead to a significant effect on the environment, and this exception does not apply.

- c. 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.*

The only State Scenic Highway within the City of Los Angeles is the Topanga Canyon State Scenic Highway, State Route 27, which travels through a portion of Topanga State Park. The portion of State Route 27 which travels through the Los Angeles city limits is approximately 18 miles from the subject site. Therefore, the project will not result in damage to any 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, and this exception does not apply.

- d. 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.*

According to EnviroStor, the State of California's database of Hazardous Waste Sites, the subject site is not identified as a hazardous waste site.

The building permit history for the Project Site does not indicate the Site may be hazardous or otherwise contaminated and this exception does not apply.

- e. 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.*

The project site is developed with residential properties and has not been identified as a historic resource by local or state agencies, and the project site has not been determined to be eligible for listing in the National Register of Historic Places, California Register of Historical Resources, the Los Angeles Historic-Cultural Monuments Register, and/or any local register. Further, the project site was not found to be a potential historic resource based on the City's HistoricPlacesLA website or SurveyLA, the citywide survey of Los Angeles. Neither the State nor the City choose to treat the site as a historic resource, therefore, the proposed project cannot cause a substantial adverse change in the significance of a historic resource and this exception does not apply.

PUBLIC HEARING AND COMMUNICATIONS

PUBLIC HEARING

The public hearing was held on February 5, 2026 at approximately 9:30 a.m. Due to concerns over COVID-19, the Public Hearing was conducted in a virtual format. The hearing was conducted by the Hearing Officer, Kyle Winston, on behalf of the City Planning Commission in taking testimony for Case No. CPC-2025-3079-DB-VHCA and ENV-2025-3081-CE. All interested parties were invited to attend the public hearing at which they could listen, ask questions, or present testimony regarding the project. The purpose of the hearing was to obtain testimony from affected and/or interested parties regarding this application. Interested parties are also invited to submit written comments regarding the request prior to the hearing.

The public hearing was attended by the applicant's representatives (Matthew Hayden) and approximately 55 other members from the community. There were 19 speakers who provided comments at the hearing.

Applicant Presentation. The applicant's representative described the site location, surrounding area within a major corridor; project description and requested entitlements. Specifically, the applicant noted the following:

- The project is close to Santa Monica Boulevard, a major transit corridor.
- The project will provide much needed housing to Los Angeles; 39 units in total.
- The project will provide three (3) Very Low Income units and three (3) Moderate Income units.
- The project provides mixed-income housing with units of various types.
- The project proposes a driveway along Missouri Avenue with access to an at-grade and subterranean parking structure with 66 parking spaces.
- There is rooftop amenity for the residents and private balconies.
- The project will provide a mix of one-bedrooms, two- and three-bedroom units.
- The façade has multiple materials that work with the context.
- Common open space has amenities for residents, including recreation rooms, and a rooftop amenity/terrace.

Public Comments:

Opposition

- This project goes against Density 'law' and Density Bonus should not be granted; preference is for the proposal to rely on by-right density (maximum 4-story and 19 units).
- There is not enough parking being provided and this proposal will impact existing parking and vehicular circulation.
- Concerns for a lack of proper feasibility study.
- Concerns with construction-related work (noise) over the weekend, especially on Saturday, which should not be allowed.
- Concerns about noise impact / disruption from the rooftop space.
- Concerns about the scale of the building (massing and height) and how this will impact daylighting reaching neighboring units, especially the elderly population.
- Concerns about the scale of the building as being too large compared to neighboring context; proposed number of units exceeds typical number of units in apartment buildings in immediate vicinity.

- Proposed building is taller than buildings along Santa Monica Blvd. and Beverly Glenn.
- Neighborhood is concerned with reduction in open space and setbacks.
- Project will change the residential quality of the streets.
- The building is too tall and concerns with the provided visual of the proposed project; the image (3D computer generated image) is deceptive and not rendered truthfully to how it will look in the existing / adjacent context.
- Concerns that the project will cause safety concerns, issues with vehicular circulation.
- Concerns about increase to vehicular traffic and the impact it will have on neighboring building's vehicular access.
- Concerns about the proposed unit sizes to be 'luxury' sizes.
- Project is not appropriate or 'harmonious' with existing context and concerns on impacts to resident's lives, especially health and wellbeing.
- This will set a precedent for other projects to build similarly.
- Nearby resident has not yet recovered from disturbance from previous construction work in neighborhood.

Applicant's Response to Public Comments and Staff Questions:

- The project is proposed under the State Density Program – the comments received do not reflect the reality of what the incentive bonus allows.
- Applicant representative has worked on many projects, and these are not that bad as projects add to the community, including market rate and affordability type units which will be added to the neighborhood.
- The applicant representative will make a contact available for the Construction management team; they have a good and experienced team on board; even though there are stages that are better and worse than others, the construction is not as bad as some anticipate.
- The applicant team will continue to reach out to the community.
- Average square footage of the unit types is approximately 600-700 square feet for 1-bedroom units, 800-900 square feet for 2-bedroom units and approximately 1,500 square feet for 3-bedroom units.
- 2-units subject to RSO, will be replaced with three (3) very low income units. The single-family home will be replaced with a market rate unit; ultimately, the proposal will increase the RSO.

WRITTEN CORRESPONDENCE

Planning Staff has received approximately 47 written correspondences on the case, including five letters in opposition from neighbors. Their comments are included in Exhibit E and summarized as follows:

Opposition

- Exemption from CEQA pursuant to CEQA Guidelines, Section 15332 (Class 32) should not be granted (From letter Point I)
- Actions requested by developers (reduction in setbacks and open space, increase in density and height) should not be allowed as it will impact the neighboring residents' quality of life. The reduction in setbacks to the north will limit daylight access to adjacent properties. (From letter Point II).

- Project is comparably larger in scale to other similar types of buildings yet on a smaller lot size; and proposed building height is not ok for its location on a local street, as project is not on a major arterial road. (From letter Point II).
- Impacts to Infrastructure and traffic (From letter Point III)
 - Granting incentives for open space reductions would affect quality of life for residents, “challenge” and add “additional pressures” to existing parks in the area.
 - Trash bins, parked on the street, on trash-pick-up-days, will add to the current street congestion.
 - Missouri Avenue is used as a shortcut by local drivers, and increasing the density to the street will further impact current traffic issues and affect pedestrian safety.
 - Concerns about infrastructure (utilities, services, road width) capacity for the proposed project.
- Environmental Impact; requesting an EIR and refuting CE-32 (From letter Point IV)
 - The removal of existing trees on site could negatively impact existing biodiversity and wildlife; proposed new trees are welcome addition; retention of street tree is good, provided it is protected in place during construction.
 - Requesting planting plan for planters on the corner of the site.
 - Reduced side yard setbacks (south) will reduce opportunity for planting street trees.
 - Concerns on adherence to front setback requirements and request for prioritizing sustainability through an environmental impact assessment.
- Notice of Public Hearing Timing and Presentation Discrepancies (from letter Point V)
 - Challenges proper notification period and posting on site.
 - Concerns on existing duplex and RSO units.
 - Affordability levels presented differently on public hearing from hearing notice.
 - Preference for having more time for hearing notice given the project scale.
 - Discontent with the rendition of the project within context.
- Public Engagement and Transparency (From letter Point VI)
 - Challenging location of Public Notice on site, as not within easy view or access.
 - Requesting city conduct research on the development, provide community consultation opportunities for the future community, and protects character and well-being of this community.

EXHIBIT D

(Notice of Exemption (NOE), Justification for
Categorical Exemption, Transit Study
Assessment with VMT Calculator, Air Quality
Report and Noise Report)

COUNTY CLERK'S USE

CITY OF LOS ANGELES

OFFICE OF THE CITY CLERK

200 NORTH SPRING STREET, ROOM 395

LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT

NOTICE OF EXEMPTION

(PRC Section 21152; CEQA Guidelines Section 15062)

Pursuant to Public Resources Code § 21152(b) and CEQA Guidelines § 15062, the notice should be posted with the County Clerk by mailing the form and posting fee payment to the following address: Los Angeles County Clerk/Recorder, Environmental Notices, P.O. Box 1208, Norwalk, CA 90650. Pursuant to Public Resources Code § 21167 (d), the posting of this notice starts a 35-day statute of limitations on court challenges to reliance on an exemption for the project. Failure to file this notice as provided above, results in the statute of limitations being extended to 180 days.

PARENT CASE NUMBER(S) / REQUESTED ENTITLEMENTS

N / A

LEAD CITY AGENCY

City of Los Angeles (Department of City Planning)

CASE NUMBER

ENV-2025-3081-CE

PROJECT TITLE

COUNCIL DISTRICT

5

PROJECT LOCATION (Street Address and Cross Streets and/or Attached Map)

☐ Map attached.

10535 West Missouri Avenue / 1847 South Fairburn Avenue (1841 South Fairburn)

PROJECT DESCRIPTION:

☐ Additional page(s) attached.

The proposed project is the construction of a 6-story, 73-foot, 6-inch-tall residential apartment building with 39 dwelling units (including 3 Very Low Income units and 3 Moderate Income units). The project will be approximately 50,034 square feet in floor area with a Floor Area Ratio ("FAR") of 4.35:1. The project will provide 66 parking spaces at grade and in a subterranean parking level, and 37 bicycle parking spaces (34 long term and 3 short term). The site is currently improved with a 2-story duplex and a one-story single-family dwelling that will be demolished. No (0) protected trees will be removed from the subject site; three (3) non-protected on-site trees will be removed, and one (1) non-protected existing street tree will remain. The project will also require a haul route for the export of approximately 6,500 cubic yards of soil.

NAME OF APPLICANT / OWNER:

David Hanasab

CONTACT PERSON (If different from Applicant/Owner above)

Matthew Hayden – Hayden Planning

(AREA CODE) TELEPHONE NUMBER

(213) 437-3403

EXT.

EXEMPT STATUS: (Check all boxes, and include all exemptions, that apply and provide relevant citations.)

STATE CEQA STATUTE & GUIDELINES

☐ STATUTORY EXEMPTION(S)

Public Resources Code Section(s) _____

☒ CATEGORICAL EXEMPTION(S) (State CEQA Guidelines Sec. 15301-15333 / Class 1-Class 33)CEQA Guideline Section(s) / Class(es) **CE-32: Infill Development**☐ OTHER BASIS FOR EXEMPTION (E.g., CEQA Guidelines Section 15061(b)(3) or (b)(4) or Section 15378(b))

JUSTIFICATION FOR PROJECT EXEMPTION:

☒ Additional page(s) attached

See attached.

☒ None of the exceptions in CEQA Guidelines Section 15300.2 to the categorical exemption(s) apply to the Project.

☐ The project is identified in one or more of the list of activities in the City of Los Angeles CEQA Guidelines as cited in the justification.

IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT ISSUED BY THE CITY PLANNING DEPARTMENT STATING THAT THE DEPARTMENT HAS FOUND THE PROJECT TO BE EXEMPT.

If different from the applicant, the identity of the person undertaking the project.

CITY STAFF USE ONLY:

CITY STAFF NAME AND SIGNATURE

Julissa Lopez-Hodoyan



STAFF TITLE

Planning Assistant

ENTITLEMENTS APPROVED

N / A

DISTRIBUTION: County Clerk, Agency Record

Rev. 6-22-2021

**DEPARTMENT OF
CITY PLANNING**

COMMISSION OFFICE
(213) 978-1300

CITY PLANNING COMMISSION

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**CITY OF LOS ANGELES
CALIFORNIA**



KAREN BASS
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DEPUTY DIRECTOR

HAYDEE URITA-LOPEZ
DEPUTY DIRECTOR

ARTHI L. VARMA, AICP
DEPUTY DIRECTOR

LISA M. WEBBER, AICP
DEPUTY DIRECTOR

JUSTIFICATION FOR PROJECT EXEMPTION CASE NO. CPC-2025-3081-CE

The proposed project is the construction of a six-story, 73-foot-6-inch-tall residential apartment building with 39 dwelling units, including three (3) Very Low-Income units and three (3) Moderate Income units. The project will be approximately 50,060 square feet in floor area, with a Floor Area Ratio ("FAR") of 4.35:1. The project will provide 66 parking spaces at an at-grade and subterranean parking level. The site is currently improved with an existing duplex (Lot 14) and single-family dwelling (Lot 15), which will both be demolished. No (0) protected trees will be removed from the subject site; three (3) existing, non-protected trees will be removed from the site; there is one (1) existing street tree along the public right-of-way; no street trees will be removed; and the project involves grading of 6,600 cubic yards of soil.

CEQA FINDINGS

DENSITY BONUS/AFFORDABLE HOUSING INCENTIVES COMPLIANCE FINDINGS

1. **Government Code Section 65915 and LAMC Section 12.22 A.25 state that the Commission shall approve a density bonus and requested incentive(s) unless the Commission finds that:**

- a. **The incentives do not result in identifiable and actual cost reductions to provide for affordable housing costs as defined in California Health and Safety Code Section 50052.5 or Section 50053 for rents for the affordable units.**

The record does not contain substantial evidence that would allow the City Planning Commission to make a finding that the requested off-menu incentives do not result in actual and identifiable cost reductions to provide for affordable housing costs per State Law. The California Health & Safety Code Sections 50052.5 and 50053 define formulas for calculating affordable housing costs for Very Low, Low, and Moderate Income Households. Section 50052.5 addresses owner-occupied housing and Section 50053 addresses rental households. Affordable housing costs are a calculation of residential rent or ownership pricing not to exceed 25 percent gross income based on area median income thresholds dependent on affordability levels.

Based on the set-aside of 15 percent of base units for Very Low Income households, the applicant is entitled to three (3) Incentives under both the Government Code and LAMC; and based on the set-aside of 15 percent of base units for Moderate Income households, the applicant is entitled to one additional (1) Incentive under both the Government Code and LAMC. Therefore, the four (4) Off-Menu requests qualify as the proposed development's Incentives. The remaining requests must be processed as Waivers of Development Standards.

- a. An increase in building height, up to 73-foot 6-inch in lieu of the allowed 45 feet per the R3-1 Zone.
- b. An up to 45% increase in FAR for a total FAR of 4.35:1 in lieu of the maximum FAR of 3:1.
- c. A minimum northerly side yard of 7 feet in lieu of 9 feet, otherwise required per the R3-1 Zone.
- d. A minimum southerly side yard of 7 feet in lieu of 9 feet, otherwise required per the R3-1 Zone.

Height: The project is subject to Height District No. 1, which limits height to 45 feet. The requested height incentive allows an increase of 28-feet 6-inches in building height, equal to a maximum building height of 73-feet 6-inches. Although the underlying zone does not limit the number of stories, the project is limited by building height. Utilization of the height incentive enables the construction of two and half additional levels, and thus facilitates the addition of at least 16 units. The additional units support the applicant's decision to reserve three (3) units for Very Low Income Households and three (3) units for Moderate Income Households. The requested Off-Menu Incentive will allow the developer to expand the building envelope so the additional units can be constructed, and the overall space dedicated to residential uses is increased.

FAR: The subject site is zoned R3-1 which allows a base FAR of 3:1 per the LAMC. The applicant has requested an FAR of 4.35:1 in lieu of the maximum 3:1 through an Off-Menu Density Bonus Incentive as allowed by LAMC 12.22 A.25, for a maximum floor area of 50,060 square feet. The additional floor area is requested to accommodate more units, including one-bedroom units. The project includes nine (9) one-bedroom units, 28 two-bedroom units, and one (1) three-bedroom unit. The requested increase in FAR will allow approximately 15,536 square feet of additional floor area and will enable the construction of affordable units. As set forth on Sheets T-1.0, T-1.3, T-1.4 and A-2.2 through A-2.6 of the project plans, the project's upper residential levels (Second Floor through Sixth Floor) would each have floor plates of 11,508 square feet with approximately 8 units at each level. These larger floor plates would not be achievable under the 3:1 base FAR and enable the project to construct the unit mix above. Without the waiver of development standards to permit additional floor area, the project would need to remove the uppermost two (2) floors containing 17 units total. The ability to develop a greater number of units will increase the revenues from the market-rate units, which will lower the marginal cost of developing the affordable units. The additional floor area will allow certain fixed costs involved in the construction of new residential units to be spread over more floor area thereby reducing the per square foot build cost of the development. The requested incentive will allow the developer to expand the building envelope so the additional units can be constructed, and the overall space dedicated to residential uses is increased. Therefore, the FAR incentive will result in identifiable and actual cost reductions to provide for affordable housing costs.

FAR by-right	Buildable Lot Area (square feet)	Base Floor Area (square feet)
3:1	11,508	11,508 x 3 = 34,524

FAR Requested	Requested Floor Area (square feet)	Additional Floor Area (square feet)
4.35:1	$11,508 \times 4.35 = 50,060$	$50,060 - 34,524 = 15,536$

Side Yards: The Los Angeles Municipal Code requires the R3-1 Zone, a 5-foot setback at ground level and an additional foot (1) for each story above the second story. The project is proposing a six-story building, therefore, the four floors above the second would require a 4-foot increase in setback width, in addition to the required 5-feet, totaling 9-feet for the required side setbacks. The project has parking on the ground floor, and residential dwelling units and residential common areas on upper levels beginning on the Second Floor. Therefore, the project would be required to provide a 9-foot side yard setback along the northerly property line, and a 9-foot side yard setback along the southerly property line. The applicant has requested to provide a 7-foot northerly side yard and 7-foot southerly side yard setback through an Off-Menu Density Bonus Incentive as allowed by LAMC 12.22 A.25. The request for the side yard reduction is needed to construct the number of units that the requested density bonus allows. Provision of 7-foot side yard setback along the northerly property line, along the approximately 107-foot 6-inch building length accounts for an additional building area of approximately 430 square feet per floor, totaling approximately 1,720 square feet across the upper four floors. Similarly, provision of a 7-foot side yard along the southerly property line, along the approximately 107-foot 6-inch building length accounts for an additional building area of approximately 430 square feet per floor, totaling approximately 1,720 square feet across the upper four floors. The northerly and southerly yards would account for a total of 3,400 square feet across the upper four floors. As shown on Sheet T-1.0, and A-2.2 through A-2.6 of the project plans, the project provides a unit mix with unit sizes ranging from 613 square feet to 1,449 square feet. Without the side yard incentives, the total unit count would be reduced by approximately 1 to 3 units and would physically preclude the construction of the development and the affordable units. Therefore, provision of the required 9-foot northerly side yard and 9-foot southerly side yard setback would physically preclude construction of the project as proposed.

- b. The Incentive will have specific adverse impact upon public health and safety or on any real property that is listed in the California Register of Historical Resources and for which there is no feasible method to satisfactorily mitigate or avoid the specific adverse Impact without rendering the development unaffordable to Very Low, Low and Moderate Income households. Inconsistency with the zoning ordinance or the general plan land use designation shall not constitute a specific, adverse impact upon the public health or safety (Government Code Section 65915(d)(1)(B) and 65589.5(d)).**

There is no evidence in the record that the proposed density bonus incentive(s) will have a specific adverse impact. A “specific adverse impact” is defined as, “a significant, quantifiable, direct and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete” (LAMC Section 12.22.A.25(b)).

The project does not involve a contributing structure in a designated Historic Preservation Overlay Zone or on the City of Los Angeles list of Historical-Cultural Monuments. The project is not located

on a substandard street in a Hillside area or a Very High Fire Hazard Severity Zone. There is no evidence in the record which identifies a written objective health and safety standard that has been exceeded or violated. There is also no substantial evidence that the project's proposed incentives will have a specific adverse impact on public health and safety, or on property listed in the California Register of Historic Resources. Based on the above, there is no basis to deny the requested incentives.

c. The incentives are contrary to state or federal laws.

There is no evidence in the record that the proposed incentives are contrary to state or federal law.

Following is a delineation of the findings related to the request for three (3) Waivers of Development Standards, pursuant to Government Code Section 65915.

2. Government Code Section 65915 and LAMC Section 12.22 A.25 state that the Commission shall approve a density bonus and requested Waiver of Development Standard(s) unless the Commission finds that:

a. *The waivers or reductions are contrary to state or federal laws.*

There is no evidence in the record that the proposed incentives are contrary to state or federal law.

A project that provides a minimum of 15 percent of its base units for Very Low Income Households qualifies for three (3) Incentives, and a project that provides 15% of Moderate Income Households qualifies for one additional (1) Incentive, but may request other "waiver[s] or reduction[s] of development standards that will have the effect of physically precluding the construction of a development meeting the [affordable set-aside percentage] criteria of subdivision (b) at the densities or with the concessions or incentives permitted under [State Density Bonus Law]" (Government Code Section 65915(e)(1)).

Therefore, the requests for the following are recommended as Waivers of Development Standards. Without the below Waivers, the existing development standards would preclude development of the proposed density bonus units and project amenities:

Residential Open Space: LAMC Section 12.21 G requires 100 square feet of usable open space per dwelling unit with less than 3 habitable rooms, and 125 square feet of usable open space per dwelling unit with 3 habitable rooms. For the proposed project with nine (9) one-bedroom units, 28 two-bedroom units, and one (1) three-bedroom unit, a total of 4,700 square feet of open space would be required. Strict compliance with the open space requirements would have the effect of physically precluding construction of a development providing 39 dwelling units, of which three (3) units will be set aside for Very Low-Income households and three (3) will be set aside for Moderate Income households. The applicant has requested a 25 percent reduction to allow 3,525 square feet of open space through a Waiver of Development Standard as allowed by LAMC 12.22 A.25. Without the incentive to reduce the minimum usable open space required to 3,525 square feet, the project would need to provide an additional 1,175 square feet of common or private open space on-site. As shown on Sheet T-1.0, and A-2.2 through A-2.6 of the project plans, the project provides a unit mix with unit sizes ranging from 613 square feet to 1,720 square feet. Compliance with the minimum usable open space provision would require the removal of floor area that could otherwise be dedicated to the number, configuration, and livability of affordable housing units. Specifically, the project would not only need to comply with the total amount of usable open space requirements, but also the design, dimension, and area requirements set forth in LAMC Section

12.21 G. Common open space would need to be at least 15 feet in width on all sides, have a minimum area of 400 square feet, and be open to sky. The project would lose the floor area of the development in order to meet all of these additional requirements for common open space.

These waivers support the applicant's decision to set aside the specified number of dwelling units for Very Low or Moderate Income Households for 99 years.

- b. The Waiver will have specific adverse impact upon public health and safety or on any real property that is listed in the California Register of Historical Resources and for which there is no feasible method to satisfactorily mitigate or avoid the specific adverse impact without rendering the development unaffordable to Very Low, Low and Moderate Income households. Inconsistency with the zoning ordinance or the general plan land use designation shall not constitute a specific, adverse impact upon the public health or safety.***

There is no evidence in the record that the proposed density bonus Waivers will have a specific adverse impact. A "specific adverse impact" is defined as, "a significant, quantifiable, direct and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete" (LAMC Section 12.22.A.25(b)).

The project does not involve a contributing structure in a designated Historic Preservation Overlay Zone or on the City of Los Angeles list of Historical-Cultural Monuments. The project is not located on a substandard street in a Hillside area or a Very High Fire Hazard Severity Zone. There is no evidence in the record which identifies a written objective health and safety standard that has been exceeded or violated. There is also no substantial evidence that the project's proposed incentives will have a specific adverse impact on public health and safety, or on property listed in the California Register of Historic Resources. Based on the above, there is no basis to deny the requested incentives.

CEQA Findings

As the designee of the Director of Planning, I have determined, based on the whole of the administrative record, that the Project is exempt from the California Environmental Quality Act ("CEQA") pursuant to CEQA Guidelines, Article 19, Section 15332 (Class 32), and there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies.

The proposed project is the construction of a six-story, 73-foot-6-inch-tall residential apartment building with 39 dwelling units (including three (3) Very Low-Income units and three (3) Moderate Income units). The project will be approximately 50,060 square feet in floor area with a Floor Area Ratio ("FAR") of 4.35:1. The primary pedestrian entrance is located along Missouri Avenue and will provide direct access to the lobby and mail room. Upper levels include residential units and nine (9) recreation rooms: two (2) on the Second through the Fifth Floor, and one (1) on the Sixth Floor. The project includes nine (9) one-bedroom units, 28 two-bedroom units, and one (1) three-bedroom unit.

Residential amenities are provided in the form of recreation rooms, roof deck, and private balconies. The project will provide 66 parking spaces in an at-grade and subterranean parking level, with one driveway accessed from Missouri Avenue. The project will also provide 34 long-term and three (3) short-term bicycle parking spaces.

The site is currently improved with one (1) one-story duplex, and one (1), one-story single-family dwelling which will be demolished. No (0) protected trees will be removed from the subject site; three (3) existing, non-protected trees will be removed from the site; there is one (1) street trees along the public right-of-way; no street trees will be removed; and the project involves grading of 6,600 cubic yards of soil.

A project qualifies for a Class 32 Categorical Exemption if it is developed on an infill site and meets the following criteria:

a. The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with the applicable zoning designation and regulations.

The project site is located within the West Los Angeles Community Plan area. The site is zoned R3-1 and has a General Plan Land Use Designation of Medium Residential. The R3-1 Zone allows for a base density of one dwelling unit per 800 square feet of lot area. Height District 1 in the R3 Zone, allows for a height of 45-feet. The project site is in the West Los Angeles Transportation Improvement and Mitigation Specific Plan (WLA TIMP, Ordinance 186,105 and 186,108). The Project is subject to Department of Transportation clearance of the WLA TIMP.

b. The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.

The property is a rectangular site, comprised of two (2) lots totaling approximately 15,127.11 square feet (0.35 acres) of lot area, and is wholly within the City of Los Angeles. Lots adjacent to the subject site are developed with urban uses. The project site is an infill site surrounded by residential uses. The project site is an infill site in an urbanized area surrounded primarily by multi-family and single-family residential. Properties to the north are zoned R3-1-O, C2-1-VL-O and [Q]C2-1VL-O and include one to five story, single and multi-family residential buildings. Properties to the east are zoned R3-1-O, R1-1-O and RD1.5-1-O and are developed with one- to four-story single and multi-family residential buildings. Properties to the south are zoned R1-1-O and are developed with one-story single-family dwellings. The surrounding neighborhood is fully developed with streets, sidewalk, gutter, sewer, and street trees.

c. The project site has no value as habitat for endangered, rare or threatened species.

The subject site is currently developed with one duplex and one single-family residential structure proposed to be demolished. Further, the subject site is surrounded by existing residential properties and development. Prior to any work on the adjacent public right-of-way, the applicant will be required to obtain approved plans from the Department of Public Works. As there currently is no approved right-of-way improvement plan and for purposes of conservative analysis under CEQA, Planning has analyzed the worst-case potential for removal of all street trees. Note that street trees and protected trees shall not be removed without prior approval of the Board of Public Works/Urban Forestry (BPW) under LAMC Sections 62.161 - 62.171. At the time of preparation of this environmental document, no approvals have been given for any tree removals on-site or in the right-of-way by BPW. The City has required a Tree Report to identify all protected trees/shrubs on the project site and all street trees in the adjacent public right-of-way. A Tree Disclosure Statement prepared by the applicant, dated May 19, 2025, indicated that there are no protected tree or shrub species on the site, or adjacent to the site. There are currently three (3) existing, Non-Protected trees on the project site proposed to be removed. There is one (1) existing tree growing in the adjacent public-right-of-way that will remain (*Ulmus parviflora*), as shown on the Landscape Architecture drawings prepared by MJS Landscape. No street trees will be

removed. Therefore, the subject site is not, and has no value as a habitat for endangered, rare, or threatened species.

d. Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.

The project will be subject to Regulatory Compliance Measures (RCMs), which require compliance with the City of Los Angeles Noise Ordinance, pollutant discharge, dewatering, stormwater mitigations; and Best Management Practices for stormwater runoff. The project does not exceed the threshold criteria established by the LADOT for preparing a traffic study. The City of Los Angeles' Vehicle Miles Traveled (VMT) calculator dated May 9, 2025, indicated that the number of daily vehicle trips will be 148 which is under the threshold of 250 or more daily vehicle trips to require VMT analysis. As such, the project will not have any significant impacts to traffic. In regards to Air Quality, interim thresholds were developed by the Los Angeles Department of City Planning staff based on California Emissions Estimator Model (CalEEMod) runs relying on reasonable assumptions, consulting with AQMD staff, and surveying published air quality studies for which criteria air pollutants did not exceed the established SCAQMD construction and operational thresholds. RCMs also include the submittal of the Geology and Soils Report to the Department of Building and Safety ("DBS"); the RCMs require that design and construction of the building must conform to the California Building Code, and grading on site shall comply with the City's Landform Grading Manual, as approved by the Department of Building and Safety Grading Division.

e. The site can be adequately served by all required utilities and public services.

The project site is currently developed, surrounded by urban uses, served by existing infrastructure, and is consistent with the General Plan. The subject site will be adequately served by all public utilities and services given that the construction of a six-story, residential building with 39 dwelling units, is in a highly urbanized area with existing utilities and public services, and is on parcels zoned for such a use and density. In addition, compliance with the LA Sanitation, Wastewater Engineering Services Division (WESD) must be followed. The WESD details conditions of approval for the proposed project (letter dated February 4, 2026), which include Wastewater Requirements, Stormwater Requirements, Groundwater Dewatering Reuse Options, and Solid Resource Requirements.

Therefore, the Project meets the qualifications of the Class 32 Exemption.

Exceptions Narrative for Class 32 Categorical Exemption

There are five (5) Exceptions which must be considered in order to find a project exempt under Class 32:

a. Cumulative Impacts. *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.*

Staff have identified zero comparable projects that have either filed or were granted approval for land use entitlements within a 500-foot radius of the subject site.

The project will result in less than significant impacts related to traffic, noise, and air quality, as shown above. The VMT Calculator dated May 9, 2025,

indicates that the project would generate a net increase of 148 daily vehicle trips, which is less than the threshold of 250 daily trips that would otherwise require a Vehicle Miles Traveled (VMT) analysis. There is no evidence to conclude that significant impacts will occur based on past project approvals or that the proposed Project's impacts are cumulatively considerable when evaluating any cumulative impacts associated with construction noise and transportation/traffic in the surrounding area. Therefore, in conjunction with citywide RCMs and compliance with other applicable regulations, no foreseeable cumulative impacts are expected.

- b. Significant Effect Due to Unusual Circumstances.** *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 project proposes a multi-family residential building in an area zoned and designated for such development. The project proposes the demolition of the existing duplex and one single-family residence, and the construction of a six-story, 73-foot-6-inch-tall residential apartment building with 39 dwelling units (including three (3) Very Low-Income units and three (3) Moderate Income units). The project will be approximately 50,060 square feet in floor area with a Floor Area Ratio ("FAR") of 4.35:1. The subject site, of two (2) lots totaling approximately 15,127.11, in the R3-1 Zone, is of a similar size and slope to nearby properties. All surrounding properties are developed with mostly residential buildings. The Floor Area, Density, Height, Yards, and Open Space of the proposed project are consistent with the Zone and Density Bonus program and incentives. The site is currently improved with one (1) one-story duplex, and one (1), one-story single-family dwelling which will be demolished. The project site is located in the Methane Zone, BOE Special Grading Area (BOE Basic Grid Map A-13372), and is within .28 km (.17 miles) of the Santa Monica Fault Zone. This site, however, is not located within the Alquist-Priolo Fault Zone, Liquefaction Zone, Landslide Area, or Very High Fire Severity Zone. There are no known designated historic resources or cultural monuments on the subject site. There are no known unusual circumstances which may lead to a significant effect on the environment, and this exception does not apply.

- c. 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.*

The only State Scenic Highway within the City of Los Angeles is the Topanga Canyon State Scenic Highway, State Route 27, which travels through a portion of Topanga State Park. The portion of State Route 27 which travels through the Los Angeles city limits is approximately 18 miles from the subject site. Therefore, the project will not result in damage to any 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, and this exception does not apply.

- d. 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.*

According to EnviroStor, the State of California's database of Hazardous Waste Sites, the subject site is not identified as a hazardous waste site.

The building permit history for the Project Site does not indicate the Site may be hazardous or otherwise contaminated and this exception does not apply.

- e. 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.*

The project site is developed with residential properties and has not been identified as a historic resource by local or state agencies, and the project site has not been determined to be eligible for listing in the National Register of Historic Places, California Register of Historical Resources, the Los Angeles Historic-Cultural Monuments Register, and/or any local register. Further, the project site was not found to be a potential historic resource based on the City's HistoricPlacesLA website or SurveyLA, the citywide survey of Los Angeles. Neither the State nor the City choose to treat the site as a historic resource, therefore, the proposed project cannot cause a substantial adverse change in the significance of a historic resource and this exception does not apply.

REFERRAL FORM



TRANSPORTATION STUDY ASSESSMENT Department of Transportation

PURPOSE

The Department of Transportation (LADOT) Referral Form (hereafter referred to as Referral Form) serves as an initial assessment to determine whether a project requires a Transportation Assessment. A Planning case must be filed with Los Angeles City Planning prior to submitting this Referral Form to LADOT.

GENERAL INFORMATION

- All new school projects, including by-right projects, must contact LADOT for an assessment of the school's proposed drop-off/pick-up scheme and to determine if any traffic controls, school warning and speed limit signs, school crosswalk and pavement markings, passenger loading zones and school bus loading zones are needed.
- Unless exempted, projects located within a Transportation Specific Plan area may be required to pay a traffic impact assessment fee, regardless of the need to prepare a Transportation Assessment.
- Pursuant to LAMC Section 19.15 of Chapter 1 or LAMC Section 15.9.2. of Chapter 1A, as applicable, a review fee payable to LADOT may be required to process this form. The applicant should contact the appropriate [LADOT Development Services Office](#) to arrange payment.
- LADOT's Vehicle Miles Traveled (VMT), VMT Calculator, and VMT Calculator User Guide can be found at <http://ladot.lacity.org>.
- A transportation study is not needed for the following project applications:
 - Ministerial / by-right projects
 - Discretionary projects limited to a request for change in hours of operation
 - Tenant improvements within an existing shopping center for change of tenants
 - Any project only installing a parking lot or parking structure
 - Time extension
 - Single-family home (unless part of a subdivision)
- This Referral Form is not intended to address the project's site access plan, driveway dimensions and location, internal circulation elements, dedication and widening, and other issues. These items require separate review and approval by LADOT.

SUBMITTAL REQUIREMENTS

When submitting this Referral Form to LADOT, complete and include a copy of the documents listed below:

- ☐ City Planning Application ([CP13-7771.1](#))
- ☐ A fully dimensioned Site Plan showing all existing and proposed structures, parking and loading areas, driveways, as well as on-site and off-site circulation
- ☐ If filing for purposes of Project Review, the Project Review Supplemental Application ([CP13-2150](#))
- ☐ Project-specific VMT Calculator analysis results
- ☐ Route this Referral Form for processing to the appropriate [LADOT Development Services Office](#) as follows (see this [map](#) for geographical reference):

LADOT DEVELOPMENT SERVICES DIVISION OFFICES

Central

100 S. Main St, 9th Floor
Los Angeles, CA 90012
ladot.devreview.cen@lacity.org

West LA

7166 W. Manchester Blvd
Los Angeles, CA 90045
ladot.devreview.wla@lacity.org

Valley

6262 Van Nuys Blvd, 3rd Floor
Van Nuys, CA 91401
ladot.devreview.sfv@lacity.org

THIS SECTION TO BE COMPLETED BY APPLICANT

PROJECT INFORMATION

Case Number: [CPC-2025-3079-DB-VHCA](#)

Address: 10535 W Missouri Avenue / 1841-1847 S Fairburn Avenue

Project Description: New 38-unit apartment building, including 3 VLI and 3 Mod units.

Seeking Existing Use Credit
(will be calculated by LADOT):

☒ YES ☐ NO ☐ UNSURE

Applicant Name: c/o David Hanasab

Email: matthew@haydenplanning.com

Phone: 310-614-2964

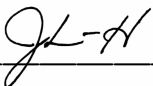
PROJECT REFERRAL TABLE

	Land Use (list all)	Size/Unit	Daily Trips ¹
Proposed ¹	Multi-family	32 units	125
	Affordable Housing - Family	6 units	23
	Total Trips ¹ :		148

THIS SECTION TO BE COMPLETED BY PLANNING STAFF ONLY

Planning Staff Name: Julissa Lopez-Hodoyan

Phone: (213) 978-1172

Signature:  Date: 3/16/26

- a. Does the proposed project involve a discretionary action? ☒ YES ☐ NO
- b. Would the proposed project generate 250 or more daily vehicle trips²? ☐ YES ☒ NO
- c. If the project is replacing an existing number of residential units with a smaller number of residential units, is the proposed project located within one-half mile of a heavy rail, light rail, or bus rapid transit station³? ☐ YES ☒ NO

If **YES** to **a.** and **b.** or **c.**, or to **all** of the above, the Project must be referred to LADOT for further assessment.

¹ Qualifying Existing Use to be determined by LADOT staff on following page, per LADOT's TAG.

² To calculate the project's total daily trips, use the VMT Calculator. Under "Project Information", enter the project address, land use type, and intensity of all proposed land uses. Select the '+' icon to enter each land use. After you enter the information, copy the 'Daily Vehicle Trips' number into the total trips in this table. Do not consider any existing use information for screening purposes. For additional questions, consult LADOT's [VMT Calculator User Guide](#) and the LADOT TAG (available on the LADOT website).

³ Relevant transit lines include Metro A, B, C, D, E, G, J, and K line stations, and Metrolink stations.

THIS SECTION TO BE COMPLETED BY LADOT

PROJECT COMPONENTS

Proposed	Land Use (list all)	Size/Unit	Daily Trips
	Total Trips:		
Existing			
	Total Trips:		
	Net Increase / Decrease (+ or -)		

- a. Is the project a single retail use that is less than 50,000 square feet? ☐ YES ☐ NO
- b. Would the project generate a net increase of 250 or more daily vehicle trips? ☐ YES ☐ NO
- c. Would the project generate a net increase of 500 or more daily vehicle trips, as determined by the ITE Trip Generation Manual, 11th Edition? ☐ YES ☐ NO
- d. Would the project result in a net increase in daily VMT? ☐ YES ☐ NO
- e. If the project is replacing an existing number of residential units with a smaller number of residential units, is the proposed project located within one-half mile of a heavy rail, light rail, or bus rapid transit station? ☐ YES ☐ NO
- f. Does the project trigger Project Review (LAMC Section 16.05 of Chapter 1 or LAMC Section 4C.14.1.C. (Development Review Threshold Packages) of Chapter 1A, depending on a property's applied zoning)? ☐ YES ☐ NO
- g. Project size:
- i. Would the project generate a net increase of 1,000 or more daily vehicle trips? ☐ YES ☐ NO

ii. Is the project's frontage 250 linear feet or more along a street classified as an Avenue or Boulevard per the City's General Plan? ☐ YES ☐ NO

iii. Is the project's building frontage encompassing an entire block along a street classified as an Avenue or Boulevard per the City's General Plan? ☐ YES ☐ NO

VMT ANALYSIS (CEQA REVIEW)

If **YES** to **a.** and **NO** to **e.** a VMT analysis is **NOT** required.

If **YES** to both **b.** and **d.**; or to **e.** a VMT analysis **is** required.

ACCESS, SAFETY, AND CIRCULATION ASSESSMENT (CORRECTIVE CONDITIONS)

If **YES** to **c.**, a Vehicle Safety and Access Evaluation may be required.

If **YES** to **f.** and either **g.i.**, **g.ii.**, or **g.iii.**, a Pedestrian, Bicycle, and Transit Access Assessment may be required.

LADOT COMMENTS:

Please note that this form is not intended to address the project's site access plan, driveway dimensions and location, internal circulation elements, dedication and widening, and other issues. These items require separate review and approval by LADOT. Qualifying Existing Use to be determined per LADOT's TAG.

LADOT ASSESSMENT QUESTIONS

Specific Plan with Trip Fee or TDM Requirements: ☐ YES ☐ NO

Fee Calculation Estimate: _____

VMT Analysis Required: ☐ YES ☐ NO

Vehicle Safety and Access Evaluation: ☐ YES ☐ NO

Pedestrian, Bicycle, and Transit Access Assessment: ☐ YES ☐ NO

Prepared by DOT Staff Name: _____ Phone: _____

Signature: _____ Date: _____

CITY OF LOS ANGELES VMT CALCULATOR Version 1.5

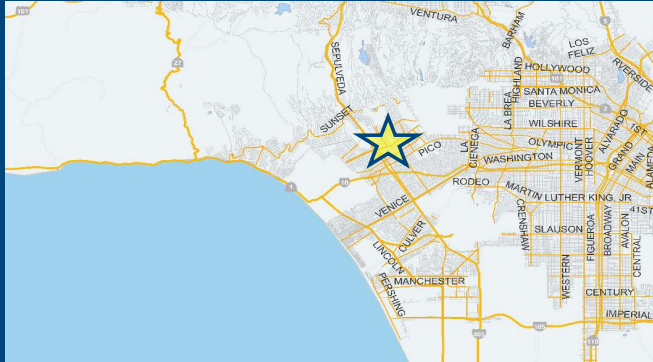


Project Screening Criteria: Is this project required to conduct a vehicle miles traveled analysis?

Project Information

Project: 10535 Missouri
 Scenario: New Apartments
 Address: 10535 W MISSOURI AVE, 90025

WWW



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

☒ Yes ☐ No

Existing Land Use

Land Use Type	Value	Unit
Housing Single Family		DU
Click here to add a single custom land use type (will be included in the above list)		

Proposed Project Land Use

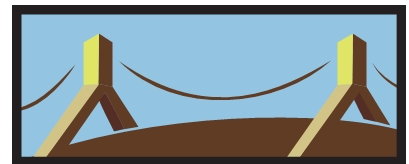
Land Use Type	Value	Unit
Housing Affordable Housing - Family	6	DU
Housing Multi-Family	32	DU
Housing Affordable Housing - Family	6	DU
Click here to add a single custom land use type (will be included in the above list)		

Project Screening Summary

Existing Land Use	Proposed
0 Daily Vehicle Trips	148 Daily Vehicle Trips
0 Daily VMT	911 Daily VMT
Tier 1 Screening Criteria	
Project will have less residential units compared to existing residential units & is within one-half mile of a fixed-rail station. ☐	
Tier 2 Screening Criteria	
The net increase in daily trips < 250 trips	148 Net Daily Trips
The net increase in daily VMT ≤ 0	911 Net Daily VMT
The proposed project consists of only retail land uses ≤ 50,000 square feet total.	0.000 ksf
The proposed project is not required to perform VMT analysis.	

10535 WEST MISSOURI AVENUE PROJECT

Air Quality Technical Report



Prepared by DKA Planning
May 2025

AIR QUALITY TECHNICAL REPORT

Introduction

This technical report addresses the air quality impacts generated by construction and operation of a Proposed Project at 10535 West Missouri Avenue in the City of Los Angeles. The analysis evaluates the consistency of the Project with air quality policies set forth in the South Coast Air Quality Management District's (SCAQMD) Air Quality Management Plan (AQMP) and the City's General Plan. The analysis of Project-generated air emissions focuses on whether the Project would cause an exceedance of an ambient air quality standard or SCAQMD significance threshold. Calculation worksheets, assumptions, and model outputs used in the analysis are included in the Technical Appendix to this analysis.

Regulatory Framework

Federal

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

The 1990 amendments to the CAA identify specific emission reduction goals for areas not meeting the National Ambient Air Quality Standard (NAAQS). These amendments require both a demonstration of reasonable further progress toward attainment and incorporation of additional sanctions for failure to attain or to meet interim milestones. The sections of the CAA which are most applicable to the Project include Title I (Nonattainment Provisions) and Title II (Mobile Source Provisions).

NAAQS have been established for seven major air pollutants: CO (carbon monoxide), NO₂ (nitrogen dioxide), O₃ (ozone), PM_{2.5} (particulate matter, 2.5 microns), PM₁₀ (particulate matter, 10 microns), SO₂ (sulfur dioxide), and Pb (lead).

The CAA requires the USEPA to designate areas as attainment, nonattainment, or maintenance (previously nonattainment and currently attainment) for each criteria pollutant based on whether the NAAQS have been achieved. Title I provisions are implemented for the purpose of attaining NAAQS. The federal standards are summarized in Table 1. The USEPA has classified the Los Angeles County portion of the South Coast Air Basin (Basin) as a nonattainment area for O₃, PM_{2.5}, and Pb.

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

Pollutant	Averaging Period	California		Federal	
		Standards	Attainment Status	Standards	Attainment Status
Ozone (O ₃)	1-hour	0.09 ppm (180 µg/m ³)	Non-attainment	--	--
	8-hour	0.070 ppm (137 µg/m ³)	Non-attainment	0.070 ppm (137 µg/m ³)	Non-attainment
Respirable Particulate Matter (PM ₁₀)	24-hour	50 µg/m ³	Non-attainment	150 µg/m ³	Attainment
	Annual Arithmetic Mean	20 µg/m ³	Non-attainment	--	--
Fine Particulate Matter (PM _{2.5})	24-hour	--	--	35 µg/m ³	Non-attainment
	Annual Arithmetic Mean	12 µg/m ³	Non-attainment	12 µg/m ³	Non-attainment
Carbon Monoxide (CO)	1-hour	20 ppm (23 mg/m ³)	Attainment	35 ppm (40 mg/m ³)	Attainment
	8-hour	9.0 ppm (10 mg/m ³)	Attainment	9 ppm (10 mg/m ³)	Attainment
Nitrogen Dioxide (NO ₂)	1-hour	0.18 ppm (338 µg/m ³)	Attainment	100 ppb (188 µg/m ³)	Attainment
	Annual Arithmetic Mean	0.030 ppm (57 µg/m ³)	Attainment	53 ppb (100 µg/m ³)	Attainment
Sulfur Dioxide (SO ₂)	1-hour	0.25 ppm (655 µg/m ³)	Attainment	75 ppb (196 µg/m ³)	Attainment
	24-hour	0.04 ppm (105 µg/m ³)	Attainment	--	--
Lead (Pb)	30-day average	1.5 µg/m ³	Attainment	--	--
	Calendar Quarter	--	--	0.15 µg/m ³	Non-attainment
Visibility Reducing Particles	8-hour	Extinction of 0.07 per kilometer	N/A	No Federal Standards	
Sulfates	24-hour	25 µg/m ³	Attainment	No Federal Standards	
Hydrogen Sulfide (H ₂ S)	1-hour	0.03 ppm (42 µg/m ³)	Unclassified	No Federal Standards	
Vinyl Chloride	24-hour	0.01 ppm (26 µg/m ³)	N/A	No Federal Standards	
N/A = not available ppm = parts per million; µg/m ³ – micrograms per cubic meter; mg/m ³ – milligrams per cubic meter Source: USEPA, NAAQS Table (https://www.epa.gov/criteria-air-pollutants/naaqs-table) and CARB, California Ambient Air Quality Standards (https://ww2.arb.ca.gov/resources/california-ambient-air-quality-standards). Attainment status data from CARB, Ambient Air Quality Standards, and attainment status (www.arb.ca.gov/desig/adm/adm.htm).					

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

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

State

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

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

The CCAA requires CARB to designate areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS thresholds have been achieved. Under the CCAA, areas are designated as nonattainment for a pollutant if air quality data shows that a state standard for

the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a state standard and are not used as a basis for designating areas as nonattainment. Under the CCAA, the non-desert Los Angeles County portion of the Basin is designated as a nonattainment area for O₃, PM₁₀, and PM_{2.5}.

In August 2022, CARB approved regulations to ban new gasoline-powered cars beginning with 2035 models. Automakers will gradually electrify their fleet of new vehicles, beginning with 35 percent of 2026 models sold. In March 2023, USEPA approved CARB's regulations that mandate that all new medium- and heavy-duty trucks would be zero emissions by 2045 where feasible. Trucking companies would also have to gradually convert their existing fleets to zero emission vehicles.

CARB has further required that all small (25 horsepower and below) off-road engines that are spark-ignited (e.g., lawn and gardening equipment) must be zero emission starting in model year 2024. Standards for portable generators and large pressure washers were given until model year 2028 to be electric-powered.

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

The Toxic Air Contaminant Identification and Control Act also requires CARB to use available information gathered from the Air Toxics "Hot Spots" Information and Assessment Act program to include in the prioritization of compounds. CARB identified particulate emissions from diesel-fueled engines (diesel PM) TACs in August 1998. Following the identification process, CARB was required by law to determine if there is a need for further control, which led to the risk management phase of the program. For the risk management phase, CARB formed the Diesel Advisory Committee to assist in the development of a risk management guidance document and a risk reduction plan. With the assistance of the Diesel Advisory Committee and its subcommittees, CARB developed the Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles and the Risk Management Guidance for the Permitting of New Stationary Diesel-Fueled Engines. CARB approved these documents on September 28, 2000, paving the way for the next step in the regulatory process: the control measure phase. During the control measure phase, specific Statewide regulations designed to further reduce diesel PM emissions from diesel-fueled engines and vehicles have and continue to be evaluated and developed. The goal of each regulation is to make diesel engines as clean as possible by establishing state-of-the-art technology requirements or emission standards to reduce diesel PM emissions. Breathing H₂S at levels above the State standard could result in exposure to a disagreeable rotten eggs odor. The State does not regulate other odors.

California Air Toxics Program. The California Air Toxics Program was established in 1983, when the California Legislature adopted Assembly Bill (AB) 1807 to establish a two-step process of risk identification and risk management to address potential health effects from exposure to toxic substances

in the air.¹ In the risk identification step, CARB and the Office of Environmental Health Hazard Assessment (OEHHA) determine if a substance should be formally identified, or “listed,” as a TAC in California. Since inception of the program, a number of such substances have been listed, including benzene, chloroform, formaldehyde, and particulate emissions from diesel-fueled engines, among others.² In 1993, the California Legislature amended the program to identify the 189 federal hazardous air pollutants as TACs.

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

In addition to limiting exhaust from idling trucks, CARB adopted regulations on July 26, 2007 for off-road diesel construction equipment such as bulldozers, loaders, backhoes, and forklifts, as well as many other self-propelled off-road diesel vehicles to reduce emissions by installation of diesel particulate filters and encouraging the replacement of older, dirtier engines with newer emission-controlled models. In April 2021, CARB proposed a 2020 Mobile Source Strategy that seeks to move California to 100 percent zero-emission off-road equipment by 2035.

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

Air Quality and Land Use Handbook: A Community Health Perspective. The *Air Quality and Land Use Handbook: A Community Health Perspective* provides important air quality information about certain types of facilities (e.g., freeways, refineries, rail yards, ports) that should be considered when siting sensitive land uses such as residences.³ CARB provides recommended site distances from certain types of facilities when considering siting new sensitive land uses. The recommendations are advisory and should not be interpreted as defined “buffer zones.” If a project is within the siting distance, CARB recommends further analysis.

Where possible, CARB recommends a minimum separation between new sensitive land uses and existing sources. Some examples of CARB’s siting recommendations include the following: (1) avoid

¹ California Air Resources Board, California Air Toxics Program, <https://ww2.arb.ca.gov/our-work/programs/air-toxics-program>, last reviewed by CARB September 24, 2015.

² California Air Resources Board, Toxic Air Contaminant Identification List, <https://ww2.arb.ca.gov/resources/documents/carb-identified-toxic-air-contaminants>.

³ California Air Resources Board, Air Quality and Land Use Handbook, a Community Health Perspective, April 2005.

siting sensitive receptors within 500 feet of a freeway, urban road with 100,000 vehicles per day, or rural roads with 50,000 vehicles per day; (2) avoid siting sensitive receptors within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units per day, or where transport refrigeration unit operations exceed 300 hours per week); and (3) avoid siting sensitive receptors within 300 feet of any dry cleaning operation using perchloroethylene and within 500 feet of operations with two or more machines.

California Code of Regulations. The California Code of Regulations (CCR) is the official compilation and publication of regulations adopted, amended or repealed by the state agencies pursuant to the Administrative Procedure Act. The CCR includes regulations that pertain to air quality emissions. Specifically, Section 2485 in CCR Title 13 states that the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) used during construction shall be limited to five minutes at any location. In addition, Section 93115 in CCR Title 17 states that operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards.

Applicable requirements for the Proposed Project would include Section 2485 in Title 13 of the CCR, where the idling of all diesel-fueled commercial vehicles (with gross vehicle weight over 10,000 pounds) during construction would be limited to five minutes at any location. Pursuant to Section 93115 in Title 17 of the CCR, operation of any stationary, diesel-fueled, compression-ignition engines would meet specific fuel and fuel additive requirements and emissions standards.

Regional (South Coast Air Quality Management District)

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

Programs that were developed by SCAQMD to attain and maintain the CAAQS and NAAQS include air quality rules and regulations that regulate stationary sources, area sources, point sources, and certain mobile source emissions. SCAQMD is also responsible for establishing stationary source permitting requirements and for ensuring that new, modified, or relocated stationary sources do not create net emission increases. However, SCAQMD has primary authority over about 20 percent of NO_x emissions, a precursor to ozone formation. All projects in the SCAQMD jurisdiction are subject to SCAQMD rules and regulations, including, but not limited to the following:

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

- Rule 402 (Nuisance): This rule prohibits the discharge of “such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of people or the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.”
- Rule 403 (Fugitive Dust): This rule mandates that projects reduce the amount of particulate matter entrained in the ambient air as a result of fugitive dust sources by requiring actions to prevent, reduce, or mitigate fugitive dust emissions from any active operation, open storage pile, or disturbed surface area.
- Rule 431.2 (Sulfur Content of Liquid Fuels): This rule would require use of low-sulfur fuel in construction equipment.
- Rule 445 (Wood Burning Devices): This would prohibit the inclusion of wood burning fireplaces in any residences.
- Rule 1113 Architectural Coatings: This rule limits the volatile organic compound (VOC) content of architectural coatings.

Air Quality Management Plan. SCAQMD adopted the 2022 Air Quality Management Plan (AQMP) on December 2, 2022, updating the region’s air quality attainment plan to address the “extreme” ozone non-attainment status for the Basin and the severe ozone non-attainment for the Coachella Valley Basin by laying a path for attainment by 2037. This includes reducing NO_x emissions by 67 percent more than required by adopted rules and regulations in 2037. The AQMP calls on strengthening many stationary source controls and addressing new sources like wildfires, but still concludes that the region will not meet air quality standards without a significant shift to zero emission technologies and significant federal action. The 2022 AQMP relies on the growth assumptions in the Southern California Association of Governments’ (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

Multiple Air Toxics Exposure Study V. To date, the most comprehensive study on air toxics in the Basin is the Multiple Air Toxics Exposure Study V, released in August 2021.⁴ The report included refinements in aircraft and recreational boating emissions and diesel conversion factors. It finds a Basin average cancer risk of 455 in a million (population-weighted, multi-pathway), which represents a decrease of 54 percent compared to the estimate in MATES IV. The monitoring program measured more than 30 air pollutants, including both gases and particulates. The monitoring study was accompanied by computer modeling that estimated the risk of cancer from breathing toxic air pollution based on emissions and weather data. About 88 percent of the risk is attributed to emissions associated with mobile sources, with the remainder attributed to toxics emitted from stationary sources, which include large industrial operations, such as refineries and metal processing facilities, as well as smaller businesses such as gas stations and chrome plating facilities. The results indicate that diesel PM is the largest contributor to air toxics risk, accounting on average for about 50 percent of the total risk.

⁴ South Coast Air Quality Management District, MATES-V Study. <https://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v>

Regional (Southern California Association of Governments)

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

SCAG adopted the 2020-2045 RTP/SCS on September 23, 2020. The RTP/SCS addresses the transportation and air quality impacts of 3.7 million additional residents, 1.6 additional households, and 1.6 million additional jobs from 2016 to 2045. The Plan calls for \$639 billion in transportation investments and reducing vehicle miles traveled (VMT) by 19 percent per capita from 2005 to 2035. The updated plan accommodates 21.3 percent growth in population from 2016 (3,933,800) to 2045 (4,771,300) and a 15.6 percent growth in jobs from 2016 (1,848,300) to 2045 (2,135,900). The regional plan projects several benefits:

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

SCAG adopted the 2024-2050 RTP/SCS on April 4, 2024. The RTP/SCS addresses the transportation and air quality impacts of two million additional residents, 1.6 additional households, and 1.3 million additional jobs by 2050. The Plan calls for \$751.7 billion in transportation investments and reducing VMT and is the latest long-range plan, continuing to recognize that transportation investments and future land use patterns are inextricably linked, and acknowledging how this relationship can help the region make choices that sustain existing resources while expanding efficiency, mobility, and accessibility for people across the region. To this end, the 2024-2050 RTP/SCS land use pattern continues the trend of focusing 66 percent of new households and 54 percent of new jobs in Priority Development Areas and the region’s High Quality Transit Corridors (HQTCs) and aims to enhance and build out the region’s transit network. HQTCs are a cornerstone of land use planning best practice in the SCAG region, and studies have found that focusing development in areas served by transit can result in local, regional, and statewide benefits including reduced air pollution and energy consumption.

Local (City of Los Angeles)

City of Los Angeles General Plan Air Quality Element. The Air Quality Element of the City's General Plan was adopted on November 24, 1992, and sets forth the goals, objectives, and policies, which guide the City in the implementation of air quality improvement programs and strategies. The Air Quality Element acknowledges the interrelationships among transportation and land use planning in meeting the City's mobility and air quality goals.

The Air Quality Element includes six key goals:

- Goal 1:** Good air quality and mobility in an environment of continued population growth and healthy economic structure.
- Goal 2:** Less reliance on single-occupant vehicles with fewer commute and non-work trips.
- Goal 3:** Efficient management of transportation facilities and system infrastructure using cost-effective system management and innovative demand management techniques.
- Goal 4:** Minimize impacts of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.
- Goal 5:** Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels and the implementation of conservation measures including passive measures such as site orientation and tree planting.
- Goal 6:** Citizen awareness of the linkages between personal behavior and air pollution and participation in efforts to reduce air pollution.

Clean Up Green Up Ordinance. The City of Los Angeles adopted a Clean Up Green Up Ordinance (Ordinance Numbers 184245 and 184246) on April 13, 2016, which includes provisions related to ventilation system filter efficiency in mechanically ventilated buildings. This ordinance added Sections 95.314.3 and 99.04.504.6 to the Los Angeles Municipal Code (LAMC) and amended Section 99.05.504.5.3 to implement building standards and requirements to address cumulative health impacts resulting from incompatible land use patterns.

All-Electric Ordinance. On November 29, 2022, the City adopted Ordinance 187714, which requires all development to be powered by electric appliances and infrastructure with the exception of any cooking equipment associated with any restaurants or eating facilities and any gas-powered emergency backup systems.⁵ This will reduce VOC and other emissions from long-term operation of new development.

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

⁵ City of Los Angeles, Ordinance 187714. https://clkrep.lacity.org/online/docs/2022/22-0151_ord_187714_1-23-23.pdf; November 29, 2022.

Land Use Compatibility. In November 2012, the Los Angeles City Planning Commission (CPC) issued an advisory notice (Zoning Information 2427) regarding the siting of sensitive land uses within 1,000 feet of freeways. The CPC deemed 1,000 feet to be a conservative distance to evaluate projects that house populations considered to be more at-risk from the negative effects of air pollution caused by freeway proximity. The CPC advised that applicants of projects requiring discretionary approval, located within 1,000 feet of a freeway and contemplating residential units and other sensitive uses (e.g., hospitals, schools, retirement homes) perform a Health Risk Assessment (HRA). The Project Site is 1.1 miles east of the northbound mainline of the San Diego Freeway (I-405).

On April 12, 2018, the City updated its guidance on siting land uses near freeways, resulting in an updated Advisory Notice effective September 17, 2018 requiring all proposed projects within 1,000 feet of a freeway adhere to the Citywide Design Guidelines, including those that address freeway proximity. It also recommended that projects consider avoiding location of sensitive uses like schools, day care facilities, and senior care centers in such projects, locate open space areas as far from the freeway, locate non-habitable uses (e.g., parking structures) nearest the freeway, and screen project sites with substantial vegetation and/or a wall barrier. Requirements for preparing HRAs were removed.

Existing Conditions

Pollutants and Effects

Air quality is defined by ambient air concentrations of seven specific pollutants identified by the USEPA to be of concern with respect to health and welfare of the general public. These specific pollutants, known as “criteria air pollutants,” are defined as pollutants for which the federal and State governments have established ambient air quality standards, or criteria, for outdoor concentrations to protect public health. Criteria air pollutants include carbon monoxide (CO), ground-level ozone (O₃), nitrogen oxides (NO_x), sulfur oxides (SO_x), particulate matter ten microns or less in diameter (PM₁₀), particulate matter 2.5 microns or less in diameter (PM_{2.5}), and lead (Pb). The following descriptions of each criteria air pollutant and their health effects are based on information provided by the SCAQMD.⁶

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

Ozone (O₃). O₃ is a gas that is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO_x)—both byproducts of internal combustion engine exhaust—undergo slow photochemical reactions in the presence of sunlight. O₃ concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable. An elevated level of O₃ irritates the lungs and breathing passages, causing coughing and pain in the chest and throat, thereby increasing susceptibility to respiratory infections and reducing the ability to exercise. Effects are more severe in people with asthma and other respiratory ailments. Long-term exposure may lead to scarring of lung tissue and may lower lung efficiency.

⁶ South Coast Air Quality Management District, Final Program Environmental Impact Report for the 2012 AQMP, December 7, 2012.

Nitrogen Dioxide (NO₂). NO₂ is a byproduct of fuel combustion and major sources include power plants, large industrial facilities, and motor vehicles. The principal form of nitrogen oxide produced by combustion is nitric oxide (NO), which reacts quickly to form NO₂, creating the mixture of NO and NO₂ commonly called NO_x. NO₂ absorbs blue light and results in a brownish-red cast to the atmosphere and reduced visibility. NO₂ also contributes to the formation of PM₁₀. Nitrogen oxides irritate the nose and throat, and increase one's susceptibility to respiratory infections, especially in people with asthma. The principal concern of NO_x is as a precursor to the formation of ozone.

Sulfur Dioxide (SO₂). Sulfur oxides (SO_x) are compounds of sulfur and oxygen molecules. SO₂ is the pre-dominant form found in the lower atmosphere and is a product of burning sulfur or burning materials that contain sulfur. Major sources of SO₂ include power plants, large industrial facilities, diesel vehicles, and oil-burning residential heaters. Emissions of sulfur dioxide aggravate lung diseases, especially bronchitis. It also constricts the breathing passages, especially in asthmatics and people involved in moderate to heavy exercise. SO₂ potentially causes wheezing, shortness of breath, and coughing. High levels of particulates appear to worsen the effect of sulfur dioxide, and long-term exposures to both pollutants leads to higher rates of respiratory illness.

Particulate Matter (PM₁₀ and PM_{2.5}). The human body naturally prevents the entry of larger particles into the body. However, small particles, with an aerodynamic diameter equal to or less than 10 microns (PM₁₀), and even smaller particles with an aerodynamic diameter equal to or less than 2.5 microns (PM_{2.5}), can enter the body and become trapped in the nose, throat, and upper respiratory tract. These small particulates can potentially aggravate existing heart and lung diseases, change the body's defenses against inhaled materials, and damage lung tissue. The elderly, children, and those with chronic lung or heart disease are most sensitive to PM₁₀ and PM_{2.5}. Lung impairment can persist for two to three weeks after exposure to high levels of particulate matter. Some types of particulates can become toxic after inhalation due to the presence of certain chemicals and their reaction with internal body fluids.

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

State-Only Criteria Pollutants

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

Sulfates (SO₄²⁻). Sulfates are the fully oxidized ionic form of sulfur. Sulfates occur in combination with metal and/or hydrogen ions. In California, emissions of sulfur compounds occur primarily from the combustion of petroleum-derived fuels (e.g., gasoline and diesel fuel) that contain sulfur. This sulfur is oxidized during the combustion process and subsequently converted to sulfate compounds in the atmosphere. Effects of sulfate exposure at levels above the standard include a decrease in ventilatory function, aggravation of asthmatic symptoms, and an increased risk of cardio-pulmonary disease. Sulfates are particularly effective in degrading visibility, and, due to fact that they are usually acidic, can harm ecosystems and damage materials and property.

Hydrogen Sulfide (H₂S). H₂S is a colorless gas with the odor of rotten eggs. It is formed during bacterial decomposition of sulfur-containing organic substances. Also, it can be present in sewer gas and some natural gas and can be emitted as the result of geothermal energy exploitation. Breathing H₂S at levels above the state standard could result in exposure to a very disagreeable odor.

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

Toxic Air Contaminants (TACs)

TACs refer to a diverse group of “non-criteria” air pollutants that can affect human health but have not had ambient air quality standards established for them. This is not because they are fundamentally different from the pollutants discussed above but because their effects tend to be local rather than regional. TACs are classified as carcinogenic and noncarcinogenic, where carcinogenic TACs can cause cancer and noncarcinogenic TAC can cause acute and chronic impacts to different target organ systems (e.g., eyes, respiratory, reproductive, developmental, nervous, and cardiovascular). CARB and OEHHA determine if a substance should be formally identified, or “listed,” as a TAC in California. A complete list of these substances is maintained on CARB’s website.⁷

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

Exposure to DPM may be a health hazard, particularly to children whose lungs are still developing and the elderly who may have other serious health problems. DPM levels and resultant potential health effects may be higher in close proximity to heavily traveled roadways with substantial truck traffic or near industrial facilities. According to CARB, DPM exposure may lead to the following adverse health effects: (1) aggravated asthma; (2) chronic bronchitis; (3) increased respiratory and cardiovascular

⁷ California Air Resources Board, Toxic Air Contaminant Identification List, <https://ww2.arb.ca.gov/resources/documents/carb-identified-toxic-air-contaminants>.

hospitalizations; (4) decreased lung function in children; (5) lung cancer; and (6) premature deaths for people with heart or lung disease.^{8,9}

Project Site

The Project Site is located within the South Coast Air Basin (the Basin); named so because of its geographical formation is that of a basin, with the surrounding mountains trapping the air and its pollutants in the valleys or basins below. The 6,745-square-mile Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. It is bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino and San Jacinto Mountains to the north and east; and the San Diego County line to the south. Ambient pollution concentrations recorded in Los Angeles County portion of the Basin are among the highest in the four counties comprising the Basin. USEPA has classified Los Angeles County as nonattainment areas for O₃, PM_{2.5}, and lead. This classification denotes that the Basin does not meet the NAAQS for these pollutants. In addition, under the CCAA, the Los Angeles County portion of the Basin is designated as a nonattainment area for O₃, PM₁₀, and PM_{2.5}. The air quality within the Basin is primarily influenced by a wide range of emissions sources, such as dense population centers, heavy vehicular traffic, industry, and meteorology.

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

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

Air Monitoring Data. The SCAQMD monitors air quality conditions at 38 source receptor areas (SRA) throughout the Basin. The Project Site is located in SCAQMD's Northwest Coastal LA County receptor area. Historical data from the area was used to characterize existing conditions in the vicinity of the Project area. Table 2 shows pollutant levels, State and federal standards, and the number of exceedances recorded in the area from 2021 through 2023. The one-hour State standard for O₃ was exceeded twice during this three-year period. The federal standard was exceeded once in that same period. There was incomplete data for PM₁₀, PM_{2.5}, CO, SO₂, and NO₂.

⁸ California Air Resources Board, Overview: Diesel Exhaust and Health, www.arb.ca.gov/research/diesel/diesel-health.htm, last reviewed by CARB April 12, 2016.

⁹ California Air Resources Board, Fact Sheet: Diesel Particulate Matter Health Risk Assessment Study for the West Oakland Community: Preliminary Summary of Results, March 2008.

Table 2
Ambient Air Quality Data

Pollutants and State and Federal Standards	Maximum Concentrations and Frequencies of Exceedance Standards		
	2021	2022	2023
Ozone (O₃)			
Maximum 1-hour Concentration (ppm)	0.095	0.081	0.109
Days > 0.09 ppm (State 1-hour standard)	1	0	1
Days > 0.070 ppm (Federal 8-hour standard)	1	0	0
Carbon Monoxide (CO₂)			
Maximum 1-hour Concentration (ppm)	1.5	N/A	N/A
Days > 20 ppm (State 1-hour standard)	0	0	0
Maximum 8-hour Concentration (ppm)	1.0	N/A	N/A
Days > 9.0 ppm (State 8-hour standard)	0	0	0
Nitrogen Dioxide (NO₂)			
Maximum 1-hour Concentration (ppm)	0.0606	0.0514	0.0439
Days > 0.18 ppm (State 1-hour standard)	0	0	0
PM₁₀			
Maximum 24-hour Concentration (µg/m ³)	N/A	N/A	N/A
Days > 50 µg/m ³ (State 24-hour standard)	N/A	N/A	N/A
PM_{2.5}			
Maximum 24-hour Concentration (µg/m ³)	N/A	N/A	N/A
Days > 35 µg/m ³ (Federal 24-hour standard)	N/A	N/A	N/A
Sulfur Dioxide (SO₂)			
Maximum 1-hour Concentration (ppb)	N/A	N/A	N/A
Days > 0.25 ppm (State 1-hour standard)	N/A	N/A	N/A
ppm = parts by volume per million of air. µg/m ³ = micrograms per cubic meter. N/A = not available at this monitoring station. Source: SCAQMD annual monitoring data at Northwest Coastal LA County subregion (http://www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year) accessed May 17, 2025.			

Existing Health Risk in the Surrounding Area. Based on the MATES-V model, the calculated cancer risk in the Project area (zip code 90025) is approximately 468 in a million.¹⁰ The cancer risk in this area is predominantly influenced by nearby sources of diesel particulate matter (e.g., diesel trucks and traffic Santa Monica Boulevard and on the San Diego Freeway 1.5 miles to the west). In general, the risk at the Project Site is higher than 54 percent of the population across the South Coast Air Basin.

The Office of Environmental Health Hazard Assessment, on behalf of the California Environmental Protection Agency (CalEPA), provides a screening tool called CalEnviroScreen that can be used to help identify California communities disproportionately burdened by multiple sources of pollution. According to CalEnviroScreen, the Project Site (Census tract 6037267100) is located in the 27th percentile, which

¹⁰ South Coast Air Quality Management District, Multiple Air Toxics Exposure Study in the South Coast Air Basin (MATES-V), MATES V Interactive Carcinogenicity Map, 2021, https://experience.arcgis.com/experience/79d3b6304912414bb21ebdde80100b23/page/home/?data_id=data_Source_105-a5ba9580e3aa43508a793fac819a5a4d%3A26&views=view_39%2Cview_1, accessed May 22, 2025.

means the Project Site has an overall environmental pollution burden higher than at least 27 percent of other communities within California.¹¹

Sensitive Receptors. Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. CARB has identified several groups that are most likely to be affected by air pollution: children less than 14 years of age, the elderly over 65 years of age, athletes, and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive receptors include residences, schools, playgrounds, childcare centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes.

The Project Site is located in a residential area in West Los Angeles. Sensitive receptors within 0.25 miles of the Project Site include, but are not limited to, the following representative sampling:

- Residences, 1833 Fairburn Avenue; five feet north of the Project Site.
- Residences, 1838 Westholme Avenue; 15 feet west of the Project Site.
- Residences, 1901 Fairburn Avenue; 60 feet south of the Project Site.
- Residences, 1840 Fairburn Avenue; 75 feet east of the Project Site.

Existing Project Site Emissions. The Project Site is improved with two multi-family residences that total 2,495 square feet and two detached garages accessed from both Fairburn Avenue and Missouri Avenue.¹² As summarized in Table 3, most existing air quality emissions are associated with the 15 daily vehicle trips traveling to and from the Project Site.¹³

Table 3
Existing Daily Operations Emissions

Emissions Source	Daily Emissions (Pounds Per Day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area Sources	0.1	<0.1	0.1	<0.1	<0.1	<0.1
Energy Sources	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
Mobile Sources	0.1	<0.1	0.4	<0.1	0.1	<0.1
Regional Total	0.1	0.1	0.1	<0.1	0.1	<0.1
<i>Source: DKA Planning, 2025 based on CalEEMod 2022.1.1.29 model runs (included in Technical Appendix). Emissions reflect daily summer season. Totals may not add up due to rounding.</i>						

Project Impacts

Methodology

The air quality analysis conducted for the Project is consistent with the methods described in the SCAQMD CEQA Air Quality Handbook (1993 edition), as well as the updates to the CEQA Air Quality

¹¹ Office of Environmental Health Hazard Assessment, <https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40>, accessed May 22, 2025.

¹² City of Los Angeles, ZIMAS database, accessed May 22, 2025.

¹³ DKA Planning, 2025, based on CalEEMod 2022.1.1.29 model.

Handbook, as provided on the SCAQMD website. The SCAQMD recommends the use of the California Emissions Estimator Model (CalEEMod) as a tool for quantifying emissions of air pollutants that will be generated by constructing and operating development projects. The analyses focus on the potential emissions from construction and operation of the Project. Methodologies used to evaluate these emissions are discussed below.

Construction. Sources of air pollutant emissions associated with construction activities include heavy-duty off-road diesel equipment and vehicular traffic to and from the Project construction site. Where available, project-specific information was provided on the schedule of construction activities and the anticipated equipment inventory. Otherwise, model default values were used for equipment usage rates, worker trip lengths, emission factors for heavy-duty equipment, passenger vehicles, and haul trucks that have been derived by CARB. Maximum daily emissions were quantified for each construction activity based on the number of equipment and daily hours of use, in addition to vehicle trips to and from the Project Site. Details pertaining to the schedule and equipment can be found in the Technical Appendix to this analysis.

The SCAQMD recommends that air pollutant emissions be assessed for both regional scale and localized impacts. The regional emissions analysis includes both on-site and off-site sources of emissions, while the localized emissions analysis focuses only on sources of emissions that would be located on the Project Site.

Localized impacts were analyzed in accordance with the SCAQMD Localized Significance Threshold (LST) methodology.¹⁴ The localized effects from on-site portion of daily emissions were evaluated at sensitive receptor locations potentially impacted by the Project according to the SCAQMD's LST methodology, which uses on-site mass emission look-up tables and Project-specific modeling, where appropriate.¹⁵ SCAQMD provides LSTs applicable to the following criteria pollutants: NO_x, CO, PM₁₀, and PM_{2.5}. SCAQMD does not provide an LST for SO₂ since land use development projects typically result in negligible construction and long-term operation emissions of this pollutant. Since VOCs are not a criteria pollutant, there is no ambient standard or SCAQMD LST for VOCs. Due to the role VOCs play in O₃ formation, it is classified as a precursor pollutant, and only a regional emissions threshold has been established.

LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. The mass rate look-up tables were developed for each source receptor area and can be used to determine whether or not a project may generate significant adverse localized air quality impacts. SCAQMD provides LST mass rate look-up tables for projects with active construction areas that are less than or equal to five acres. If the project exceeds the LST look-up values, then the SCAQMD recommends that project-specific air quality modeling must be performed. Please refer to **Threshold b** below, for the analysis of localized impacts from on-site construction activities. In accordance with SCAQMD guidance, maximum daily emissions of NO_x, CO, PM₁₀, and PM_{2.5} from on-site sources during each construction activity were compared to LST values for a one-acre site having

¹⁴ South Coast Air Quality Management District, Final Localized Significance Methodology, revised July 2008.

¹⁵ South Coast Air Quality Management District, LST Methodology Appendix C-Mass Rate LST Look-Up Table, <https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf?sfvrsn=2>, October 2009.

sensitive receptors within 25 meters (82 feet).¹⁶ This is appropriate given the 0.35-acre site and the proximity of sensitive receptors as close as five feet from the Project Site.

The Basin is divided into 38 SRAs, each with its own set of maximum allowable LST values for on-site emissions sources during construction and operations based on locally monitored air quality. Maximum on-site emissions resulting from construction activities were quantified and assessed against the applicable LST values.

The significance criteria and analysis methodologies in the SCAQMD's CEQA Air Quality Handbook were used in evaluating impacts in the context of the CEQA significance criteria listed below. The SCAQMD LSTs for NO₂, CO, and PM₁₀ were initially published in June 2003 and revised in July 2008.¹⁷ The LSTs for PM_{2.5} were established in October 2006 and updated on October 21, 2009.^{18 19} Table 4 presents the significance criteria for both construction and operational emissions.

Table 4
SCAQMD Emissions Thresholds

Criteria Pollutant	Construction Emissions		Operation Emissions	
	Regional	Localized /a/	Regional	Localized /a/
Volatile Organic Compounds (VOC)	75	--	55	--
Nitrogen Oxides (NO _x)	100	103	55	103
Carbon Monoxide (CO)	550	562	550	562
Sulfur Oxides (SO _x)	150	--	150	--
Respirable Particulates (PM ₁₀)	150	4	150	1
Fine Particulates (PM _{2.5})	55	3	55	1
/a/ Localized significance thresholds for the Northwest Coastal LA County source receptor area assumed a 1-acre and 25-meter (82-foot) receptor distance, which are the applicable thresholds for a 0.35-acre site with adjacent receptors as close as five feet away. Pursuant to SCAQMD guidance, sensitive receptors closer than 25 meters to a construction site are to use the LSTs for receptors at 25 meters (SCAQMD Final Localized Significance Threshold Methodology, June 2008). The SCAQMD has not developed LST values for VOC or SO_x. Source: SCAQMD.				

Operations. CalEEMod also generates estimates of daily and annual emissions of air pollutants resulting from future operation of a project. Operational emissions are produced by mobile sources (vehicular travel) and stationary sources (e.g., utilities demand). Utilities for the Project Site are provided by the Los Angeles Department of Water and Power (LADWP) for electricity and Southern California Gas for natural gas, where applicable. CalEEMod has derived default emissions factors for electricity and natural gas use that are applied to the size and land use type of the Project. CalEEMod also estimates operational emissions associated with water use, wastewater generation, and solid waste disposal.

¹⁶ South Coast Air Quality Management District, Fact Sheet for Applying CalEEMod to Localized Significance Thresholds, <https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/caleemod-guidance.pdf>, 2008.

¹⁷ Ibid.

¹⁸ South Coast Air Quality Management District, Final – Methodology to Calculate Particulate Matter (PM) 2.5 and PM 2.5 Significance Thresholds, [https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/particulate-matter-\(pm\)-2.5-significance-thresholds-and-calculation-methodology/final_pm2_5methodology.pdf](https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/particulate-matter-(pm)-2.5-significance-thresholds-and-calculation-methodology/final_pm2_5methodology.pdf), October 2006.

¹⁹ South Coast Air Quality Management District, Final Localized Significance Threshold Methodology Appendix C – Mass Rate LST Look-Up Tables, <https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf?sfvrsn=2>, October 21, 2009.

Similar to construction, SCAQMD's CalEEMod software was used for the evaluation of Project emissions during operation. CalEEMod was used to calculate on-road fugitive dust, architectural coatings, landscape equipment, energy use, mobile source, and stationary source emissions.²⁰ To determine if a significant air quality impact would occur, the net increase in regional and local operational emissions generated by the Project was compared against SCAQMD's significance thresholds.²¹ Details describing the operational emissions of the Project can be found in the Technical Appendix.

Toxic Air Contaminants Impacts (Construction and Operations). Potential TAC impacts are evaluated by conducting a qualitative analysis consistent with the CARB Handbook followed by a more detailed analysis (i.e., dispersion modeling), as necessary. The qualitative analysis consists of reviewing the Project to identify any new or modified TAC emissions sources. If the qualitative evaluation does not rule out significant impacts from a new source, or modification of an existing TAC emissions source, a more detailed analysis is conducted.

Thresholds of Significance

State CEQA Guidelines Appendix G

Would the Project:

- a) *Conflict with or obstruct implementation of the applicable air quality plan;*
- b) *Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard;*
- c) *Expose sensitive receptors to substantial pollutant concentrations; or*
- d) *Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*

City and SCAQMD Thresholds

For this analysis the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations recommended by the City of Los Angeles and SCAQMD Thresholds, as appropriate, to assist in answering the Appendix G Threshold questions.

(a) Construction

The City recommends that determination of significance be made on a case-by-case basis, considering the following criteria to evaluate construction-related air emissions:

²⁰ Energy consumption estimates with CalEEMod 2022.1.1.29 are based on the California Energy Commission's 2020 Residential Appliance Saturation Survey (residential uses) and 2021 Commercial Forecast database, both of which reflected the 2019 Title 24 energy efficiency standards. These energy consumption estimates were adjusted to reflect the 2022 Title 24 standards that cumulatively produce a 0.49 percent reduction in electricity use and 0.45 percent reduction in natural gas use when compared to the 2019 standards.

²¹ South Coast Air Quality Management District, Air Quality Significance Thresholds, revised March 2015. SCAQMD based these thresholds, in part on the federal Clean Air Act and, to enable defining "significant" for CEQA purposes, defined the setting as the South Coast Air Basin. (See SCAQMD, CEQA Air Quality Handbook, April 1993, pp. 6-1-6-2).

(i) *Combustion Emissions from Construction Equipment*

- Type, number of pieces and usage for each type of construction equipment;
- Estimated fuel usage and type of fuel (diesel, natural gas) for each type of equipment; and
- Emission factors for each type of equipment.

(ii) *Fugitive Dust—Grading, Excavation and Hauling*

- Amount of soil to be disturbed on-site or moved off-site;
- Emission factors for disturbed soil;
- Duration of grading, excavation and hauling activities;
- Type and number of pieces of equipment to be used; and
- Projected haul route.

(iii) *Fugitive Dust—Heavy-Duty Equipment Travel on Unpaved Road*

- Length and type of road;
- Type, number of pieces, weight and usage of equipment; and
- Type of soil.

(iv) *Other Mobile Source Emissions*

- Number and average length of construction worker trips to Project Site, per day; and
- Duration of construction activities.

In addition, the following criteria set forth in the SCAQMD's *CEQA Air Quality Handbook* serve as quantitative air quality standards to be used to evaluate project impacts under the Appendix G Thresholds. Under these thresholds, a significant threshold would occur when:²²

- Regional emissions from both direct and indirect sources would exceed any of the following SCAQMD prescribed threshold levels: (1) 100 pounds per day for NO_x; (2) 75 pounds a day for VOC; (3) 150 pounds per day for PM₁₀ or SO_x; (4) 55 pounds per day for PM_{2.5}; and (5) 550 pounds per day for CO.
- Maximum on-site daily localized emissions exceed the LST, resulting in predicted ambient concentrations in the vicinity of the Project Site greater than the most stringent ambient air quality standards for CO (20 ppm [23,000 µg/m³] over a 1-hour period or 9.0 ppm [10,350 µg/m³] averaged over an 8-hour period) and NO₂ (0.18 ppm [339 µg/m³] over a 1-hour period, 0.1 ppm [188 µg/m³] over a three-year average of the 98th percentile of the daily maximum 1-hour average, or 0.03 ppm [57 µg/m³] averaged over an annual period).
- Maximum on-site localized PM₁₀ or PM_{2.5} emissions during construction exceed the applicable LSTs, resulting in predicted ambient concentrations in the vicinity of the Project Site to exceed

²² South Coast Air Quality Management District, Air Quality Significance Thresholds, revised March 2015.

the incremental 24-hour threshold of 10.4 $\mu\text{g}/\text{m}^3$ or 1.0 $\mu\text{g}/\text{m}^3$ PM_{10} averaged over an annual period.

(b) Operation

The City bases the determination of significance of operational air quality impacts on criteria set forth in the SCAQMD's *CEQA Air Quality Handbook*.²³ As discussed above, the City uses Appendix G as the thresholds of significance for this analysis. Accordingly, the following serve as quantitative air quality standards to be used to evaluate project impacts under the Appendix G thresholds. Under these thresholds, a significant threshold would occur when:

- Operational emissions exceed 10 tons per year of volatile organic gases or any of the following SCAQMD prescribed threshold levels: (1) 55 pounds a day for VOC;²⁴ (2) 55 pounds per day for NO_x ; (3) 550 pounds per day for CO; (4) 150 pounds per day for SO_x ; (5) 150 pounds per day for PM_{10} ; and (6) 55 pounds per day for $\text{PM}_{2.5}$.²⁵
- Maximum on-site daily localized emissions exceed the LST, resulting in predicted ambient concentrations in the vicinity of the Project Site greater than the most stringent ambient air quality standards for CO (20 parts per million (ppm) over a 1-hour period or 9.0 ppm averaged over an 8-hour period) and NO_2 (0.18 ppm over a 1-hour period, 0.1 ppm over a 3-year average of the 98th percentile of the daily maximum 1-hour average, or 0.03 ppm averaged over an annual period).²⁶
- Maximum on-site localized operational PM_{10} and $\text{PM}_{2.5}$ emissions exceed the incremental 24-hour threshold of 2.5 $\mu\text{g}/\text{m}^3$ or 1.0 $\mu\text{g}/\text{m}^3$ PM_{10} averaged over an annual period.²⁷
- The Project causes or contributes to an exceedance of the California 1-hour or 8-hour CO standards of 20 or 9.0 ppm, respectively; or
- The Project creates an odor nuisance pursuant to SCAQMD Rule 402.

(c) Toxic Air Contaminants

The City recommends that the determination of significance shall be made on a case-by-case basis, considering the following criteria to evaluate TACs:

- Would the project use, store, or process carcinogenic or non-carcinogenic toxic air contaminants which could result in airborne emissions?

²³ South Coast Air Quality Management District, Air Quality Significance Thresholds, revised March 2015.

²⁴ For purposes of this analysis, emissions of VOC and reactive organic compounds (ROG) are used interchangeably since ROG represents approximately 99.9 percent of VOC emissions.

²⁵ South Coast Air Quality Management District, Quality Significance Thresholds, www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf, last updated March 2015.

²⁶ South Coast Air Quality Management District, Final Localized Significance Threshold Methodology, revised July 2008.

²⁷ South Coast Air Quality Management District, Final—Methodology to Calculate Particulate Matter (PM) 2.5 and $\text{PM}_{2.5}$ Significance Thresholds, October 2006.

In assessing impacts related to TACs in this section, the City uses Appendix G as the thresholds of significance. The criteria identified above will be used where applicable and relevant to assist in analyzing the Appendix G thresholds. In addition, the following criteria set forth in the SCAQMD's *CEQA Air Quality Handbook* serve as quantitative air quality standards to be used to evaluate project impacts under Appendix G thresholds. Under these thresholds, a significant threshold would occur when:²⁸

- The Project results in the exposure of sensitive receptors to carcinogenic or toxic air contaminants that exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0.²⁹ For projects with a maximum incremental cancer risk between 1 in one million and 10 in one million, a project would result in a significant impact if the cancer burden exceeds 0.5 excess cancer cases.

(d) *Consistency with Applicable Air Quality Plans*

CEQA Guidelines Section 15125 requires an analysis of project consistency with applicable governmental plans and policies. This analysis is conducted to assess potential project impacts against Threshold (a) from the Appendix G thresholds. In accordance with the SCAQMD's *CEQA Air Quality Handbook*, the following criteria are used to evaluate a project's consistency with the AQMP:³⁰

- Will the Project result in any of the following:
 - An increase in the frequency or severity of existing air quality violations;
 - Cause or contribute to new air quality violations; or
 - Delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP?
- Will the Project exceed the assumptions utilized in preparing the AQMP?
 - Is the Project consistent with the population and employment growth projections upon which AQMP forecasted emission levels are based;
 - Does the Project include air quality mitigation measures; or
 - To what extent is Project development consistent with the AQMP land use policies?

The Project's impacts with respect to these criteria are discussed to assess the consistency with the SCAQMD's AQMP and SCAG regional plans and policies. In addition, the Project's consistency with the City of Los Angeles General Plan Air Quality Element is discussed.

Project Design Features. The Project would comply with the 2022 Los Angeles Green Building Code

²⁸ South Coast Air Quality Management District, *CEQA Air Quality Handbook*, April 1993, Chapter 6 (Determining the Air Quality Significance of a Project) and Chapter 10 (Assessing Toxic Air Pollutants).

²⁹ Hazard index is the ratio of a toxic air contaminant's concentration divided by its Reference Concentration, or safe exposure level. If the hazard index exceeds one, people are exposed to levels of TACs that may pose noncancer health risks.

³⁰ South Coast Air Quality Management District, *CEQA Air Quality Handbook*, April 1993, p. 12-3.

(LAGBC),³¹ which will build upon and set higher standards than those in the 2022 California Green Building Standards Code (CalGreen, effective January 1, 2023).³² Construction in later years could be subject to the future 2025 LAGBC and CalGreen standards. Further energy efficiency and sustainability features would include native plants and drip/subsurface irrigation systems, individual metering or sub metering for water use, leak detection systems, and electric vehicle charging capacity. In accordance with City Ordinance 187714, the Project would be all-electric with the exception of any cooking equipment associated with any restaurants or eating facilities.

The Project's lower off-street parking supply (66 spaces for 39 residences) will reduce car ownership rates and resulting vehicle use that will reduce energy and air quality emissions. The Project's infill location is a design feature that would promote the concentration of development in an urban location with access to transportation infrastructure and public transit facilities. This would reduce vehicle miles traveled (VMT) for residents and visitors who want options to driving cars.

Analysis of Project Impacts

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

Less Than Significant Impact. The Project's air quality emissions would not exceed any State or federal standards. Therefore, the Project would not increase the frequency or severity of an existing violation or cause or contribute to new violations for these pollutants. As the Project would not exceed any State and federal standards, the Project would also not delay timely attainment of air quality standards or interim emission reductions specified in the AQMP.

With respect to the determination of consistency with AQMP growth assumptions, the projections in the AQMP for achieving air quality goals are based on assumptions in SCAG's 2020-2045 RTP/SCS regarding population, housing, and growth trends.³³ Determining whether a project exceeds the assumptions reflected in the AQMP involves the evaluation of three criteria: (1) consistency with applicable population, housing, and employment growth projections; (2) project mitigation measures; and (3) appropriate incorporation of AQMP land use planning strategies. The following discussion provides an analysis with respect to each of these three criteria.

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

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

³¹ City of Los Angeles Department of Building and Safety: <http://ladbs.org/forms-publications/forms/green-building>.

³² California Building Codes: <http://www.bsc.ca.gov/Codes.aspx>.

³³ While SCAG adopted the 2024-2050 RTP/SCS on April 4, 2024, the region's applicable air quality plan is the 2022 AQMP, which is based on the growth assumptions of the 2020-2045 RTP/SCS. Once the 2022 AQMP is updated with these growth forecasts, consistency with the projections in the applicable air quality plan for the region will be based on the 2024-2050 RTP/SCS.

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

On April 4, 2024, SCAG adopted the 2024-2050 RTP/SCS, which accommodates 4,315,900 persons; 1,828,201 households; and 2,137,732 jobs in the City of Los Angeles by 2050. Once the 2022 AQMP is updated with these growth forecasts, consistency with the projections in the applicable air quality plan for the region will be based on the 2024-2050 RTP/SCS.

The City provided local growth forecasts that were incorporated into the regional projections. The Project Site is classified as "Medium Residential" in the General Plan Framework and zoned R3 (Residential Zone), which permits residential uses. It also includes zoning classifications that allow residential development, including "Housing Element Inventory of Sites-Housing Replacement Requirements (ZI-2512)", which requires on-site replacement housing. As such, the RTP/SCS' assumptions about growth in the City accommodate the projected population and housing on the Project Site. As a result, the Project would be consistent with the growth assumptions in the City's General Plan. Because the AQMP accommodates growth forecasts from local General Plans, the emissions associated with this Project are accounted for and mitigated in the region's air quality attainment plans. The air quality impacts of development on the Project Site are accommodated in the region's emissions inventory for the 2020-2045 RTP/SCS and 2022 AQMP

Based on the average 2020 persons-per-household rate for the City of 2.42 persons per household,³⁴ the Project would add a net residential population of approximately 90 people to the Project Site based on the 37 net dwelling units proposed. The Project's residential population would represent approximately 0.01 percent of the forecast population growth between 2016 and 2045 and be consistent with the local growth assumptions that formed the basis of the region's AQMP.

- Does the project implement feasible air quality mitigation measures?

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

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

With regard to land use developments, the AQMP's air quality policies focus on the reduction of vehicle trips and VMT. The Project would implement a number of land use policies of the City of Los Angeles, SCAQMD, and SCAG, as it would be designed and constructed to support and promote environmental sustainability. The Project represents an infill development within an urbanized area that would concentrate more housing and population within a high quality transit area (HQTa). "Green" principles are incorporated throughout the Project to comply with the City of Los Angeles Green Building Code and

³⁴ Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, July 31, 2019.

CALGreen through energy conservation, water conservation, and waste reduction features. In accordance with City Ordinance 187714, the Project would be all-electric.

The air quality plan applicable to the Project area is the 2022 AQMP, the current management plan for progression toward compliance with State and federal clean air requirements. The Project would be required to comply with all regulatory measures set forth by the SCAQMD. Implementation of the Project would not interfere with air pollution control measures listed in the 2022 AQMP. As noted earlier, the Project is consistent with the land use policies of the City that were reflected in the regional growth projections for the AQMP. As demonstrated in the following analysis, the Project would not result in significant emissions that would jeopardize regional or localized air quality standards.

City of Los Angeles Policies

The Project would offer convenient access to public transit and opportunities for walking and biking (including the provision of bicycle parking), thereby facilitating a reduction in VMT. In addition, the Project would be consistent with the existing land use pattern in the vicinity that concentrates urban density along major arterials and near transit options and would help reduce air quality emissions in several ways:

- The Project Site is within a HQT, which reflects areas with rail transit service or bus service where lines have peak headways of less than 15 minutes.³⁵
- The Project Site is located in a Transit Priority Area, which are locations within one-half mile of a major transit stop with bus or rail transit service with frequencies of 15 minutes or less.
- The Project Site is considered a Transit Oriented Communities (TOC) Tier 2 based on the shortest distance between any point on the lot and qualified Major Transit Stops.³⁶
- Because of its location and TOC status, the Project will reduce on-site parking supply (66 spaces for 39 residences) that will by definition reduce car ownership and resulting vehicle travel.
- There is substantial public transit service in the area, including:
 - Los Angeles Metropolitan Transportation Authority (Metro) Line 4 which provides east-west service along Santa Monica Boulevard that connects Downtown Los Angeles with Santa Monica. The nearest bus stop is at Prosser Avenue and Thayer Avenue, both about 800 feet from the Project Site.
- Bicyclists can use Class II bicycle lanes on Santa Monica Boulevard
- The project will provide three short- and 34 long-term bicycle parking spaces on-site.

The City's General Plan Air Quality Element identifies 30 policies with specific strategies for advancing the City's clean air goals. As illustrated in Table 5, the Project is consistent with the applicable policies in the Air Quality Element, as the Project would implement sustainability features that would reduce vehicular trips, reduce VMT, and encourage the use of alternative modes of transportation. Therefore,

³⁵ Southern California Association of Governments Data Portal https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial_active-transportation.pdf?1606001530,

³⁶ Major Transit Stop is a site containing a rail station or the intersection of two or more bus routes with a service interval of 15 minutes or less during the morning and afternoon peak commute periods. The stations or bus routes may be existing, under construction or included in the most recent Southern California Association of Governments (SCAG) Regional Transportation Plan (RTP).

the Project would result in a less than significant impact related to consistency with the Air Quality Element.

Table 5
Project Consistency with City of Los Angeles General Plan Air Quality Element

Goal/Objective/Policy	Project Consistency
Goal 1. Good air quality and mobility in an environment of continued population growth and healthy economic structure.	Consistent. The Project's infill location along the dense Santa Monica Boulevard corridor will reduce vehicle travel and associated criteria pollutants over development on greenfield sites outside the urban core and be consistent with the region's AQMP attainment plan.
Goal 2. Less reliance on single-occupant vehicles with fewer commute and non-work trips.	Consistent. The Project's limited off-street parking and infill location along the dense Santa Monica Boulevard corridor will reduce car ownership and resulting single-occupant vehicle trips for commute and non-work trips.
Goal 4. Minimal impact of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.	Consistent. The Project addresses the relationship between land use, transportation, and air quality with its infill location in proximity to bicycling and bus transit alternatives to driving alone. This reduces mobile source emissions and contributes to the region's AQMP attainment plan by limiting the impacts of development and resulting vehicle emissions.
Goal 5. Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels, and the implementation of conservation measures including passive methods such as site orientation and tree planting.	Consistent. The Project's off-street parking and infill location along the dense Santa Monica Boulevard corridor will reduce car ownership and resulting single-occupant vehicle trips for commute and non-work trips. The exclusive use of electricity will substantially reduce VOC and other emissions from combustion of fossil fuels. The inclusion of electric vehicle charging facilities will support the efforts to expand use of non-polluting electric vehicles.
Objective 1.1. It is the objective of the City of Los Angeles to reduce air pollutants consistent with the Regional Air Quality Management Plan (AQMP), increase traffic mobility, and sustain economic growth citywide.	Consistent. The Project is consistent with the growth forecasts that underly the attainment demonstration in the 2022 AQMP. As such, the Project reduces air pollutants consistent with the AQMP.
Objective 1.3. It is the objective of the City of Los Angeles to reduce particulate air pollutants emanating from unpaved areas, parking lots, and construction sites.	Consistent. The Project would reduce particulate emissions during construction activities through compliance with SCAQMD Rule 403 (Fugitive Dust) that will reduce PM ₁₀ and PM _{2.5} emissions from unpaved areas.
Objective 2.1. It is the objective of the City of Los Angeles to reduce work trips as a step towards attaining trip reduction objectives necessary to achieve regional air quality goals.	Consistent. The Project's infill location and proximity to major bus transit will reduce work trips, as the high transit mode split for commuting will help attain trip reduction objectives consistent with the 2020 RTP and 2022 AQMP.
Objective 4.2. It is the objective of the City of Los Angeles to reduce vehicle trips and vehicle miles traveled associated with land use patterns.	Consistent. The Project's infill location and proximity to major bus transit will reduce all trips, as the high transit mode split and active transportation options will help attain trip reduction objectives consistent with the 2020 RTP and 2022 AQMP.

Table 5
Project Consistency with City of Los Angeles General Plan Air Quality Element

Goal/Objective/Policy	Project Consistency
Objective 5.1. It is the objective of the City of Los Angeles to increase energy efficiency of City facilities and private developments.	Consistent. The Project would advance the City's energy efficiency objectives. The exclusive use of electricity will substantially reduce VOC and other emissions from combustion of fossil fuels. The inclusion of electric vehicle charging facilities will support the efforts to expand use of non-polluting electric vehicles.
Policy 1.3.1. Minimize particulate emissions from construction sites.	Consistent. The Project would minimize particulate emissions during construction through best practices and/or SCAQMD rules (e.g., Rule 403, Fugitive Dust).
Policy 1.3.2. Minimize particulate emissions from unpaved roads and parking lots associated with vehicular traffic.	Not Applicable. The Project would not involve use of unpaved roads or parking lots.
Policy 2.1.1. Utilize compressed work weeks and flextime, telecommuting, carpooling, vanpooling, public transit, and improve walking/bicycling related facilities in order to reduce vehicle trips and/or VMT as an employer and encourage the private sector to do the same to reduce work trips and traffic congestion.	Consistent. The Project is a residential project and would not have any employers. Nevertheless, the Project would promote alternative commute options for residents who can take advantage of public transit and active transportation options. The Project's reduced off-street parking supply will ensure low car ownership rates that will reduce vehicle travel and VMT. In turn, the Project Site is well-served by public transit, including Metro Line 4 service that connects the City of Santa Monica and Downtown Los Angeles.
Policy 2.1.2. Facilitate and encourage the use of telecommunications (i.e., telecommuting) in both the public and private sectors, in order to reduce work trips.	Consistent. Residents could use high-speed telecommunications services as an alternative to driving to work. A June 2020 study by the National Bureau of Economic Research found that 37 percent of jobs can be performed entirely from home (https://www.nber.org/papers/w26948). As such, the Proposed Project could help reduce commuting to work through telecommuting.
Policy 2.2.1. Discourage single-occupant vehicle use through a variety of measures such as market incentive strategies, mode-shift incentives, trip reduction plans and ridesharing subsidies.	Consistent. As the Project Site is classified as a TOC Tier 2 site, the Project would discourage single-occupant vehicle use because of the limited parking (66 spaces for 39 residences). Residents and visitors can use public transit, including Metro Line 4 service on Santa Monica Boulevard and Class II bicycle lanes along Santa Monica Boulevard.
Policy 2.2.2. Encourage multi-occupant vehicle travel and discourage single-occupant vehicle travel by instituting parking management practices.	Consistent. As noted above, the Project Site's TOC Tier 2 status allows the garage to be limited to parking for 66 vehicles. The development would provide transportation options to residents as an option to driving.
Policy 2.2.3. Minimize the use of single-occupant vehicles associated with special events or in areas and times of high levels of pedestrian activities.	Not Applicable. The Project would not include facilities for special events.
Policy 3.2.1. Manage traffic congestion during peak hours.	Consistent. The Project is a low traffic generator because of the nature of residential uses, which generate peak

Table 5
Project Consistency with City of Los Angeles General Plan Air Quality Element

Goal/Objective/Policy	Project Consistency
	hour vehicle trips that are lower than commercial, retail, and restaurant uses. Further, the Project would also minimize traffic congestion based on its location near transit opportunities, which would encourage the use of alternative modes of transportation. Residents and visitors can use public transit, including Metro Line 4 service along Santa Monica Boulevard.
Policy 4.1.1. Coordinate with all appropriate regional agencies on the implementation of strategies for the integration of land use, transportation, and air quality policies.	Not Applicable. This policy is directed at the City and not individual development projects. Nonetheless, the Project is being considered for approval by the City of Los Angeles, which coordinates with SCAG, Metro, and other regional agencies on the coordination of land use, air quality, and transportation policies.
Policy 4.1.2. Ensure that project level review and approval of land use development remains at the local level.	Consistent. The Project would be entitled and environmentally cleared at the local level. The Project would not inhibit the implementation of this policy.
Policy 4.2.1. Revise the City's General Plan/Community Plans to achieve a more compact, efficient urban form and to promote more transit-oriented development and mixed-use development.	Not Applicable. This policy calls for City updates to its General Plan. The Project would not inhibit the implementation of this policy.
Policy 4.2.2. Improve accessibility for the City's residents to places of employment, shopping centers and other establishments.	Consistent. The Project would be infill development that would provide the City's residents with proximate access to jobs and services at this Project Site.
Policy 4.2.3. Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.	Consistent. The Project would promote public transit, active transportation, and alternative fuel vehicles for residents and visitors, who can use public transit, including Metro Line 4 service on Santa Monica Boulevard and Class II bicycle lanes along Santa Monica Boulevard. The Project would also include eight electric vehicle charging stations and 17 more spaces with conduits and supplies for future charging stations.
Policy 4.2.4. Require that air quality impacts be a consideration in the review and approval of all discretionary projects.	Consistent. The Project's air quality impacts are analyzed in this document, and as discussed herein, all impacts with respect to air quality would be less than significant.
Policy 4.2.5. Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.	Consistent. The proposed project would support use of alternative transportation modes. The Project Site is well-served by public transit, including Metro Line 4 service on Santa Monica Boulevard. The Project also provides three short- and 34 long-term bicycle parking spaces on-site for residents and workers, who can use Class II bicycle lanes on Santa Monica Boulevard.
Policy 4.3.1. Revise the City's General Plan/Community Plans to ensure that new or relocated sensitive receptors are located to	Not Applicable. This policy calls for City updates to its General Plan. The Project would not inhibit the implementation of this policy.

Table 5
Project Consistency with City of Los Angeles General Plan Air Quality Element

Goal/Objective/Policy	Project Consistency
minimize significant health risks posed by air pollution sources.	
Policy 4.3.2. Revise the City's General Plan/Community Plans to ensure that new or relocated major air pollution sources are located to minimize significant health risks to sensitive receptors.	Not Applicable. This policy calls for City updates to its General Plan. The Project would not inhibit the implementation of this policy.
Policy 5.1.1. Make improvements in Harbor and airport operations and facilities in order to reduce air emissions.	Not Applicable. This policy calls for cleaner operations of the City's water port and airport facilities. The Project would not inhibit the implementation of this policy.
Policy 5.1.2. Effect a reduction in energy consumption and shift to non-polluting sources of energy in its buildings and operations.	Not Applicable. This policy calls for cleaner operations of the City's buildings and operations. The Project would not inhibit the implementation of this policy and would promote a shift from combustion of fossil fuels by using electric power for its operations.
Policy 5.1.3. Have the Department of Water and Power make improvements at its in-basin power plants in order to reduce air emissions.	Not Applicable. This policy calls for cleaner operations of the City's Water and Power energy plants. The Project would not inhibit the implementation of this policy.
Policy 5.1.4. Reduce energy consumption and associated air emissions by encouraging waste reduction and recycling.	Consistent. The Project would be consistent with this policy by complying with Title 24, CALGreen, and other requirements to reduce solid waste and energy consumption. This includes the City's March 2010 ordinance (Council File 09-3029) that requires all mixed construction and demolition waste be taken to City-certified waste processors.
Policy 5.2.1. Reduce emissions from its own vehicles by continuing scheduled maintenance, inspection and vehicle replacement programs; by adhering to the State of California's emissions testing and monitoring programs; by using alternative fuel vehicles wherever feasible, in accordance with regulatory agencies and City Council policies.	Not Applicable. This policy calls for the City to gradually reduce the fleet emissions inventory from its vehicles through use of alternative fuels, improved maintenance practices, and related operational improvements. The Project's support of electric vehicles will continue the State's conversion to zero emission fleets that do not required engine inspections
Policy 5.3.1. Support the development and use of equipment powered by electric or low-emitting fuels.	Consistent. The Project would be designed to meet the applicable requirements of the States Green Building Standards Code and the City of Los Angeles' Green Building Code, both of which promote a shift from natural gas use toward electrification of buildings. The Project would also include eight electric vehicle charging stations and 17 more spaces with conduits and supplies for future charging stations. The Project would be powered by electricity, pursuant to City Ordinance 187714.
Policy 6.1.1. Raise awareness through public-information and education programs of the actions that individuals can take to reduce air emissions.	Not Applicable. This policy calls for the City to promote clean air awareness through its public awareness programs. The Project would not inhibit the implementation of this policy.
Source: DKA Planning, 2025.	

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

Less Than Significant Impact.

Construction

A cumulatively considerable net increase would occur if the project's construction impacts substantially contribute to air quality violations when considering other projects that may undertake construction activities at the same time. Individual projects that generate emissions that do not exceed SCAQMD's significance thresholds would not contribute considerably to any potential cumulative impact. SCAQMD neither recommends quantified analyses of the emissions generated by a set of cumulative development projects nor provides thresholds of significance to assess the impacts associated with these emissions.³⁷

Construction-related emissions were estimated using the SCAQMD's CalEEMod 2022.1.1.29 model and a projected construction schedule of at least 29 months. Table 6 summarizes the potential construction schedule that was modeled for air quality impacts.

Table 6
Construction Schedule Assumptions

Phase	Duration	Notes
Demolition	Months 1-2	Removal of 400 tons of debris hauled 41 miles to landfill in 14-cubic yard capacity trucks.
Site Preparation	Month 3	Grubbing and removal of trees, plants, landscaping, weeds
Grading	Month 4	Approximately 6,500 cubic yards of soil (including 25 percent swell factor) ³⁸ hauled 41 miles to landfill in 14-cubic yard capacity trucks.
Trenching	Month 4	Trenching for utilities, including gas, water, electricity, and telecommunications.
Building Construction	Months 5-29	Footings and foundation work, framing, welding; installing mechanical, electrical, and plumbing. Floor assembly, cabinetry and carpentry, elevator installations, low voltage systems, trash management.
Architectural Coatings	Months 22-26	Application of interior and exterior coatings and sealants.
Source: DKA Planning, 2025.		

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

³⁷ South Coast Air Quality Management District, 2003 White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution, <https://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper.pdf>: "As Lead Agency, the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR...Projects that exceed the project-specific significance threshold are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are not considered to be cumulatively significant."

³⁸ City of Los Angeles, Environmental Assessment Form

- SCAQMD Rule 403, would reduce the amount of particulate matter entrained in ambient air as a result of anthropogenic fugitive dust sources by requiring actions to prevent, reduce or mitigate fugitive dust emissions.
- SCAQMD Rule 1113, which limits the VOC content of architectural coatings.
- SCAQMD Rule 402, which states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other materials which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.
- In accordance with Section 2485 in Title 13 of the California Code of Regulations, the idling of all diesel-fueled commercial vehicles (with gross vehicle weight over 10,000 pounds) during construction would be limited to five minutes at any location.
- In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines would meet specific fuel and fuel additive requirements and emissions standards.

Regional Emissions

Construction activity creates air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the Project Site. NO_x emissions would primarily result from the use of construction equipment and truck trips.

Fugitive dust emissions would peak during grading activities, where approximately 6,500 cubic yards of soil (including swell factors) would be exported from the Project Site to accommodate portions of a two-level subterranean structure. All construction projects in the Basin must comply with SCAQMD Rule 403 for fugitive dust, which include measures to prevent visible dust plumes. Other measures include, but are not limited to, applying water and/or soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system or other control measures to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project Site, and maintaining effective cover over exposed areas. Compliance with Rule 403 would reduce regional PM_{2.5} and PM₁₀ emissions associated with construction activities by approximately 61 percent.

During the building finishing phase, the application of architectural coatings (e.g., paints) would release VOCs (regulated by SCAQMD Rule 1113). The assessment of construction air quality impacts considers each of these potential sources. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

As shown in Table 7, construction of the Project would produce VOC, NO_x, CO, SO_x, PM₁₀ and PM_{2.5} emissions that do not exceed the SCAQMD's regional thresholds. As a result, construction of the Project would not contribute substantially to an existing violation of air quality standards for regional pollutants (e.g., ozone). This impact is considered less than significant.

Localized Emissions

In addition to maximum daily regional emissions, maximum localized (on-site) emissions were quantified for each construction activity. The localized construction air quality analysis was conducted using the methodology promulgated by the SCAQMD. Look-up tables provided by the SCAQMD were used to determine localized construction emissions thresholds for the Project.³⁹ LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard and are based on the most recent background ambient air quality monitoring data (2021-2023) for the Project area.

Table 7
Daily Construction Emissions

Construction Phase Year	Daily Emissions (Pounds Per Day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
2026	1.3	13.5	13.0	<0.1	3.4	1.7
2027	2.8	5.9	11.0	<0.1	0.9	0.3
2028	2.8	5.6	10.4	<0.1	0.9	0.3
Maximum Regional Total	2.8	13.5	13.0	<0.1	3.4	1.7
Regional Threshold	75	100	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Maximum Localized Total	4.9	1.4	10.9	<0.1	2.6	1.5
Localized Threshold	N/A	103	562	N/A	4	3
Exceed Threshold?	N/A	No	No	N/A	No	No
<i>The construction dates are used for the modeling of air quality emissions in the CalEEMod software. If construction activities commence later than what is assumed in the environmental analysis, the actual emissions would be lower than analyzed because of the increasing penetration of newer equipment with lower certified emission levels. Assumes implementation of SCAQMD Rule 403 (Fugitive Dust Emissions)</i> <i>Source: DKA Planning, 2025 based on CalEEMod 2022.1.1.29 model runs. LST analyses based on one-acre site with 25-meter distances to receptors in Northwest Coastal LA County source receptor area. Estimates reflect the peak summer or winter season, whichever is higher. Totals may not add up due to rounding. Modeling sheets included in the Technical Appendix.</i>						

Maximum on-site daily construction emissions for NO_x, CO, PM₁₀, and PM_{2.5} were calculated using CalEEMod and compared to the applicable SCAQMD LSTs for the Northwest Coastal LA County SRA based on construction site acreage that is less than or equal to one acre. Potential impacts were evaluated at the closest off-site sensitive receptor, which are the residences to the north of the Project Site on Fairburn Avenue. The closest receptor distance on the SCAQMD mass rate LST look-up tables is 25 meters.

As shown in Table 7, above, the Project would produce emissions that do not exceed the SCAQMD's recommended localized standards of significance for NO₂ and CO during the construction phase.

³⁹ South Coast Air Quality Management District, LST Methodology Appendix C-Mass Rate LST Look-Up Table, <https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf?sfvrsn=2>, October 2009.

Similarly, construction activities would not produce PM₁₀ and PM_{2.5} emissions that exceed localized thresholds recommended by the SCAQMD. These estimates assume the use of Best Available Control Measures (BACMs) that address fugitive dust emissions of PM₁₀ and PM_{2.5} through SCAQMD Rule 403. This would include watering portions of the site that are disturbed during grading activities and minimizing tracking of dirt onto local streets. Therefore, construction impacts on localized air quality are considered less than significant.

Operation

Operational emissions of criteria pollutants would come from area, energy, and mobile sources. Area sources include consumer products such as household cleaners, architectural coatings for routine maintenance, and landscaping equipment.⁴⁰ Energy sources include electricity and natural gas use for space cooling and heating and water heating. The CalEEMod model generates estimates of emissions from energy use based on the land use type and size. The Project would also produce long-term air quality impacts to the region primarily from motor vehicles that access the Project Site. The Project could add 148 vehicle trips to local roadways and the region's air quality airshed on a weekday at the start of operations in 2028.⁴¹ When the 15 vehicle trips traveling to and from the existing duplex are considered, the Proposed Project would result in a net increase of 133 vehicle trips.

As shown in Table 8, the Project's emissions would not exceed the SCAQMD's regional or localized significance thresholds. Therefore, the operational impacts of the Project on regional and localized air quality are considered less than significant.

Table 8
Daily Operations Emissions

Emissions Source	Daily Emissions (Pounds Per Day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area Sources	1.2	<0.1	3.4	<0.1	<0.1	<0.1
Energy Sources	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
Mobile Sources	0.4	0.3	2.9	<0.1	0.7	0.2
Regional Total	1.6	0.3	6.3	<0.1	0.7	0.2
Existing Total	-0.1	-0.1	-0.1	<0.1	-0.1	<0.1
Net Regional Total	1.5	0.2	6.2	<0.1	0.6	0.2
Regional Significance Threshold	55	55	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Net Localized Total	1.1	<0.1	3.3	<0.1	<0.1	<0.1
Localized Significance Threshold	N/A	103	562	--	2	1
Exceed Threshold?	No	No	No	No	No	No
LST analyses based on 1-acre site with 25-meter distances to receptors in Northwest Coastal LA County source receptor area. Source: DKA Planning, 2025 based on CalEEMod 2022.1.1.29 model runs (included in the Technical Appendix).						

⁴⁰ In 2021, CARB adopted regulations requiring that all small (25 horsepower and below) spark-ignited off-road engines (e.g., lawn and gardening equipment) be zero emission starting in model year 2024. Standards for portable generators and large pressure washers are given until model year 2028 to be electric-powered.

⁴¹ City of Los Angeles VMT Calculator, version 1.5 screening analysis.

c. Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. There are several sensitive receptors within 0.25 miles (1,320 feet) of the Project Site that could be exposed to air pollution from construction and operation of the Project, including, but are not limited to, the following representative sampling:

- Residences, 1833 Fairburn Avenue; five feet north of the Project Site.
- Residences, 1838 Westholme Avenue; 15 feet west of the Project Site.
- Residences, 1901 Fairburn Avenue; 60 feet south of the Project Site.
- Residences, 1840 Fairburn Avenue; 75 feet east of the Project Site.

Construction

Construction of the Project could expose sensitive receptors to substantial pollutant concentrations if maximum daily emissions of regulated pollutants generated by sources located on and/or near the Project Site exceeded the applicable LST values presented in Table 4, or if construction activities generated significant emissions of TACs that could result in carcinogenic risks or non-carcinogenic hazards exceeding the SCAQMD Air Quality Significance Thresholds of ten excess cancers per million or non-carcinogenic Hazard Index greater than 1.0, respectively. As discussed above, the LST values were derived by the SCAQMD for the criteria pollutants NO_x, CO, PM₁₀, and PM_{2.5} to prevent the occurrence of concentrations exceeding the air quality standards at sensitive receptor locations based on proximity and construction site size.

As shown in Table 8, during construction of the Project, maximum daily localized unmitigated emissions of NO₂, CO, PM₁₀, and PM_{2.5} from sources on the Project Site would remain below each of the respective LST values. Unmitigated maximum daily localized emissions would not exceed any of the localized standards for receptors that are within 25 meters of the Project's construction activities. Therefore, based on SCAQMD guidance, localized emissions of criteria pollutants would not have the potential to expose sensitive receptors to substantial concentrations that would present a public health concern.

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

Furthermore, according to SCAQMD methodology, health risks from carcinogenic air toxics are usually described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of TACs over a 30-year period will contract cancer based on the use of standard risk-assessment methodology. The entire duration of construction activities associated with implementation of the Project is anticipated to be approximately 29 months, and the magnitude of diesel PM emissions will vary over this time period. No residual emissions and corresponding individual cancer risk are anticipated after construction. Because there is such a short-term exposure period, construction TAC emissions would result in a less than significant impact. Therefore, construction of the Project would not expose sensitive receptors to substantial diesel PM concentrations, and this impact would be less than significant.

Operation

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

When considering potential air quality impacts under CEQA, consideration is given to the location of sensitive receptors within close proximity of land uses that emit TACs. CARB has published and adopted the Air Quality and Land Use Handbook: A Community Health Perspective, which provides recommendations regarding the siting of new sensitive land uses near potential sources of air toxic emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities).⁴² The SCAQMD adopted similar recommendations in its Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning.⁴³ Together, CARB and SCAQMD guidelines recommend siting distances for both the development of sensitive land uses in proximity to TAC sources and the addition of new TAC sources in proximity to existing sensitive land uses.

The primary sources of potential air toxics associated with Project operations include DPM from delivery trucks (e.g., truck traffic on local streets and idling on adjacent streets). However, these activities, and the land uses associated with the Project, are not considered land uses that generate substantial TAC emissions. It should be noted that the SCAQMD recommends that health risk assessments (HRAs) be conducted for substantial individual sources of DPM (e.g., truck stops and warehouse distribution facilities that generate more than 100 trucks per day or more than 40 trucks with operating transport refrigeration units) and has provided guidance for analyzing mobile source diesel emissions.⁴⁴ Based on this guidance, the Project would not include these types of land uses and is not considered to be a substantial source of DPM warranting a refined HRA since daily truck trips to the Project Site would not exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units. In addition, CARB-mandated airborne toxic control measures (ATCM) limits diesel-fueled commercial vehicles (delivery trucks) to idle for no more than five minutes at any given time, which would further limit diesel particulate emissions.

As the Project would not contain substantial TAC sources and is consistent with the CARB and SCAQMD guidelines, the Project would not result in the exposure of off-site sensitive receptors to carcinogenic or toxic air contaminants that exceed the maximum incremental cancer risk of ten in one million or an acute or chronic hazard index of 1.0, and potential TAC impacts would be less than significant.

⁴² California Air Resources Board, Air Quality and Land Use Handbook, a Community Health Perspective, April 2005.

⁴³ South Coast Air Quality Management District, Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, May 6, 2005.

⁴⁴ South Coast Air Quality Management District, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis, 2002.

The Project would generate long-term emissions on-site from area and energy sources that would generate negligible pollutant concentrations of CO, NO₂, PM_{2.5}, or PM₁₀ at nearby sensitive receptors. While long-term operations of the Project would add traffic to local roads that produces off-site emissions, these would not result in exceedances of CO air quality standards at roadways in the area due to three key factors. First, CO hotspots are extremely rare and only occur in the presence of unusual atmospheric conditions and extremely cold conditions, neither of which applies to this Project area. Second, auto-related emissions of CO continue to decline because of advances in fuel combustion technology in the vehicle fleet. Finally, the Project would not contribute to the levels of congestion that would be needed to produce emissions concentrations needed to trigger a CO hotspot, as it would add 133 net vehicle trips to the local roadway network on weekdays when the development could be leased and operational in 2028. The majority of vehicle-related impacts at the Project Site would come from 11 and 13 vehicles entering and exiting the development during the peak A.M. and P.M. hours, respectively.⁴⁵ This would represent a small addition to traffic volumes on local roadways. For example, it would represent 0.26 percent of the 4,211 vehicles currently using Santa Monica Boulevard at Overland Avenue in the A.M. peak hour, an intersection that would be used for the haul route as trucks travel to and from the Tierra Rejada Landfill in Moorpark.⁴⁶ Assuming peak hour volumes represent ten percent of daily volumes, this intersection would carry 42,110 daily vehicle trips, well below the traffic volumes that would be needed to generate CO exceedances of the ambient air quality standard.⁴⁷

Finally, the Project would not result in any substantial emissions of TACs during the construction or operations phase. During the construction phase, the primary air quality impacts would be associated with the combustion of diesel fuels, which produce exhaust-related particulate matter that is considered a toxic air contaminant by CARB based on chronic exposure to these emissions.⁴⁸ However, construction activities would not produce chronic, long-term exposure to diesel particulate matter. During long-term project operations, the Project does not include typical sources of acutely and chronically hazardous TACs such as industrial manufacturing processes and automotive repair facilities. As a result, the Project would not create substantial concentrations of TACs.

In addition, the SCAQMD recommends that health risk assessments be conducted for substantial sources of diesel particulate emissions (e.g., truck stops and warehouse distribution facilities) and has provided guidance for analyzing mobile source diesel emissions.⁴⁹ The Project would not generate a substantial number of truck trips. Based on the limited activity of TAC sources, the Project would not

⁴⁵ DKA Planning, 2025. Hourly trip generation based on Institute of Transportation Engineer's hourly trip generation factors for Multifamily Housing (Mid-Rise) (land use code 221).

⁴⁶ DKA Planning, 2025, based on City of Los Angeles database of traffic volumes on Santa Monica Boulevard at Overland Avenue, https://navigatela.lacity.org/dot/traffic_data/manual_counts/17016_OVESAN170214.pdf, 2017 traffic counts adjusted by one percent growth factor to represent existing conditions.

⁴⁷ South Coast Air Quality Management District; 2003 AQMP. As discussed in the 2003 AQMP, the 1992 CO Plan included a CO hotspot analysis at four intersections in the peak A.M. and P.M. time periods, including Long Beach Boulevard and Imperial Highway (Lynwood), Wilshire Boulevard and Veteran Avenue (Westwood), Sunset Boulevard and Highland Avenue (Hollywood), and La Cienega Boulevard and Century Boulevard (Inglewood). The busiest intersection was Wilshire and Veteran, used by 100,000 vehicles per day. The 2003 AQMP estimated a 4.6 ppm one-hour concentration at this intersection, which meant that an exceedance (20 ppm) would not occur until daily traffic exceeded more than 400,000 vehicles per day.

⁴⁸ California Office of Environmental Health Hazard Assessment. Health Effects of Diesel Exhaust. [www.oehha.ca.gov/public_info/facts/dieselfacts.html](http://oehha.ca.gov/public_info/facts/dieselfacts.html)

⁴⁹ South Coast Air Quality Management District, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions, December 2002.

warrant the need for a health risk assessment associated with on-site activities. Therefore, the Project's operational impacts on local sensitive receptors would be less than significant.

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

Less Than Significant Impact. The Project would not result in activities that create objectionable odors. The Project is a housing development that would not include any activities typically associated with unpleasant odors and local nuisances (e.g., rendering facilities, dry cleaners). SCAQMD regulations that govern nuisances (i.e., Rule 402, Nuisances) would regulate any intermittent odors associated with residences. As a result, any odor impacts from the Project would be considered less than significant.

Cumulative Impacts

While the Proposed Project would generate short- and long-term emissions during the construction and operations phases, respectively, the presence of any other development projects could produce cumulative impacts.

There are two potential related projects identified by the City of Los Angeles within 0.25 miles of the Proposed Project (Table 9), illustrated in Figure 1.⁵⁰ Any potential development closer to the Project Site and/or sensitive receptors could contribute to localized air quality impacts. Beyond 1,000 feet of the Project Site, any sensitive receptors between the Project Site and any related project would be negligibly impacted, as localized pollutants substantially disperse as a function of distance, meteorology, and terrain. The U.S. EPA finds that in the context of roadway pollutants, "...concentrations generally decrease to background levels within 500-600 feet."⁵¹ CARB also finds that air pollution levels can be significantly higher within 500 feet of freeways or other major sources.⁵²

Table 9
Related Projects Within 0.25 Miles of Project Site

#	Address	Distance from Project Site	Use	Size	Status
1	10306 Santa Monica Bl.	1,800 feet northeast	Apartments	116 units	Completed
2	10400 Santa Monica Bl.	1,200 feet northeast	Apartments	120 units	Pending
<i>Source: Related Projects Summary from Case Logging and Tracking System Los Angeles Department of Transportation, May 5, 2025.</i>					

However, both of the potential related projects are more than 1,000 feet from the Project Site. As a result, there are no reasonably foreseeable related projects that could contribute to cumulative localized air quality impacts at the analyzed sensitive receptors

⁵⁰ City of Los Angeles, Related Projects Summary from Case Logging and Tracking System, May 5, 2025.

⁵¹ U.S. EPA. Near Roadway Air Pollution and Health: Frequently Asked Questions. August 2014.

⁵² South Coast Air Quality Management District. Guidance Document: Air Quality Issues Regarding Land Use.

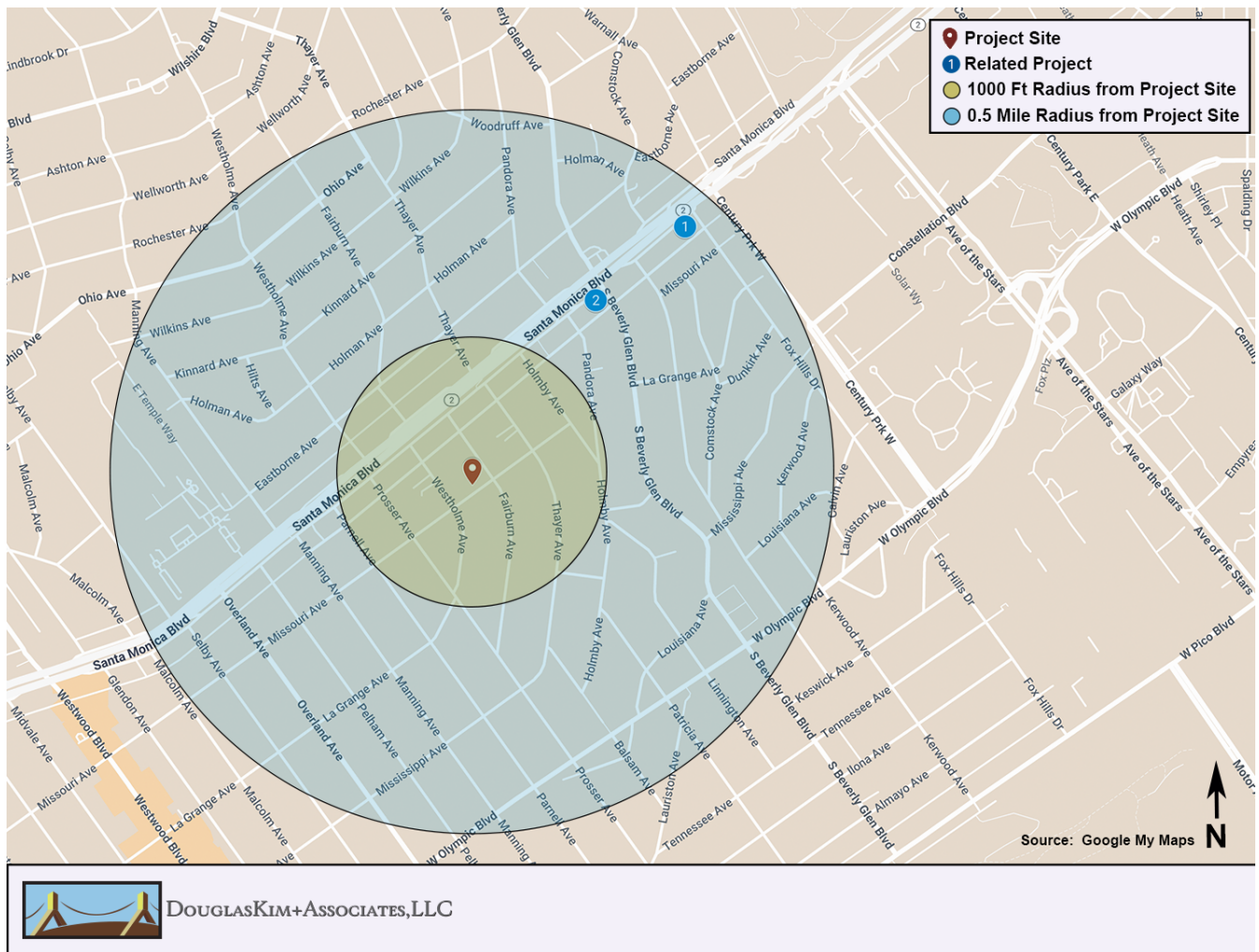


Figure 1
Related Projects

AQMP Consistency

Cumulative development is not expected to result in a significant impact in terms of conflicting with, or obstructing implementation of the 2022 AQMP. As discussed previously, growth considered to be consistent with the AQMP would not interfere with attainment because this growth is included in the projections utilized in the formulation of the AQMP. Consequently, as long as growth in the Basin is within the projections for growth identified in the 2020-2045 RTP/SCS, implementation of the AQMP will not be obstructed by such growth. In addition, as discussed previously, the population growth resulting from the Project would be consistent with the growth projections of the AQMP. Any related project would implement feasible air quality mitigation measures to reduce the criteria air pollutants, if required due to any significant emissions impacts. In addition, each related project would be evaluated for its consistency with the land use policies set forth in the AQMP. Therefore, the Project's contribution to the cumulative impact would not be cumulatively considerable and, therefore, would be less than significant.

Construction

SCAQMD recommends that any construction-related emissions and operational emissions from individual development projects that exceed the project-specific mass daily emissions thresholds

identified above also be considered cumulatively considerable.⁵³ Individual projects that generate emissions not in excess of SCAQMD's significance thresholds would not contribute considerably to any potential cumulative impact. SCAQMD neither recommends quantified analyses of the emissions generated by a set of cumulative development projects nor provides thresholds of significance to be used to assess the impacts associated with these emissions.

As summarized in Table 7, the Proposed Project would not exceed the SCAQMD's mass emissions thresholds and would not contribute to any potential cumulative impact. If any related project was projected to exceed LST thresholds (after mitigation), it could perform dispersion modeling to confirm whether health-based air quality standards would be violated. The SCAQMD's LST thresholds recognize the influence of a receptor's proximity, setting mass emissions thresholds for PM₁₀ and PM_{2.5} that generally double with every doubling of distance.

The Project would comply with regulatory requirements, including the SCAQMD Rule 403 requirements listed above. Based on SCAQMD guidance, individual construction projects that exceed the SCAQMD's recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is in non-attainment. As shown above, construction-related daily emissions at the Project Site would not exceed any of the SCAQMD's regional or localized significance thresholds. Therefore, the Project's contribution to cumulative air quality impacts would not be cumulatively considerable and, therefore, would be less than significant.

Similar to the Project, the greatest potential for TAC emissions at each related project would generally involve diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of TACs over a 30-year period will contract cancer, based on the use of standard risk-assessment methodology. Construction activities are temporary and short-term events, thus construction activities at each related project would not result in a long-term substantial source of TAC emissions. Additionally, the SCAQMD CEQA guidance does not require a health risk assessment for short-term construction emissions. It is therefore not meaningful to evaluate long-term cancer impacts from construction activities, which occur over relatively short durations. As such, given the short-term nature of these activities, cumulative toxic emission impacts during construction would be less than significant.

Operation

As discussed above, the Project's operational air quality emissions and cumulative impacts would be less than significant. According to the SCAQMD, if an individual project results in air emissions of criteria pollutants that exceed the SCAQMD's recommended daily thresholds for project-specific impacts, then the project would also result in a cumulatively considerable net increase of these criteria pollutants. As operational emissions would not exceed any of the SCAQMD's regional or localized significance thresholds, the emissions of non-attainment pollutants and precursors generated by Project operations would not be cumulatively considerable.

With respect to TAC emissions, neither the Project nor any likely related projects (which are largely residential, retail/commercial in nature), would represent a substantial source of TAC emissions, which

⁵³ White Paper on Regulatory Options for Addressing Cumulative Impacts from Air Pollution Emissions, SCAQMD Board Meeting, September 5, 2003, Agenda No. 29, Appendix D, p. D-3.

are typically associated with large-scale industrial, manufacturing, and transportation hub facilities. The Project and related projects would be consistent with the recommended screening level siting distances for TAC sources, as set forth in CARB's Land Use Guidelines, and the Project and related projects would not result in a cumulative impact requiring further evaluation. However, any related projects could generate minimal TAC emissions related to the use of consumer products and landscape maintenance activities, among other things. Pursuant to AB 1807, which directs the CARB to identify substances as TACs and adopt airborne toxic control measures to control such substances, the SCAQMD has adopted numerous rules (primarily in Regulation XIV) that specifically address TAC emissions. These SCAQMD rules have resulted in and will continue to result in substantial Basin-wide TAC emissions reductions. As such, cumulative TAC emissions during long-term operations would be less than significant. Therefore, the Project would not result in any substantial sources of TACs that have been identified by the CARB's Land Use Guidelines, and thus, would not contribute to a cumulative impact.

TECHNICAL APPENDIX



DOUGLASKIM+ASSOCIATES,LLC

EXISTING EMISSIONS

10535 Missouri Avenue (Existing) Detailed Report

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4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

5. Activity Data

5.9. Operational Mobile Sources

5.9.1. Unmitigated

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.2. Architectural Coatings

5.10.3. Landscape Equipment

5.11. Operational Energy Consumption

5.11.1. Unmitigated

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

5.13. Operational Waste Generation

5.13.1. Unmitigated

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

5.16.2. Process Boilers

5.17. User Defined

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

5.18.2. Sequestration

5.18.2.1. Unmitigated

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

6.2. Initial Climate Risk Scores

6.3. Adjusted Climate Risk Scores

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

7.2. Healthy Places Index Scores

7.3. Overall Health & Equity Scores

7.4. Health & Equity Measures

7.5. Evaluation Scorecard

7.6. Health & Equity Custom Measures

8. User Changes to Default Data

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	10535 Missouri Avenue (Existing)
Operational Year	2025
Lead Agency	City of Los Angeles
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.70
Precipitation (days)	19.6
Location	10535 Missouri Ave, West Los Angeles, CA 90025, USA
County	Los Angeles-South Coast
City	Los Angeles
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	4321
EDFZ	16
Electric Utility	Los Angeles Department of Water & Power
Gas Utility	Southern California Gas
App Version	2022.1.1.29

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Apartments Low Rise	2.00	Dwelling Unit	0.35	2,495	3,500	—	6.00	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Unmit.	0.12	0.05	0.53	< 0.005	< 0.005	0.08	0.08	< 0.005	0.02	0.02
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Unmit.	0.11	0.05	0.39	< 0.005	< 0.005	0.08	0.08	< 0.005	0.02	0.02
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—
Unmit.	0.11	0.05	0.43	< 0.005	< 0.005	0.07	0.07	< 0.005	0.02	0.02
Annual (Max)	—	—	—	—	—	—	—	—	—	—
Unmit.	0.02	0.01	0.08	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Mobile	0.05	0.04	0.41	< 0.005	< 0.005	0.08	0.08	< 0.005	0.02	0.02
Area	0.07	< 0.005	0.11	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Energy	< 0.005	0.01	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Water	—	—	—	—	—	—	—	—	—	—

Waste	—	—	—	—	—	—	—	—	—	—
Refrig.	—	—	—	—	—	—	—	—	—	—
Total	0.12	0.05	0.53	< 0.005	< 0.005	0.08	0.08	< 0.005	0.02	0.02
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Mobile	0.05	0.04	0.38	< 0.005	< 0.005	0.08	0.08	< 0.005	0.02	0.02
Area	0.06	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Energy	< 0.005	0.01	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Water	—	—	—	—	—	—	—	—	—	—
Waste	—	—	—	—	—	—	—	—	—	—
Refrig.	—	—	—	—	—	—	—	—	—	—
Total	0.11	0.05	0.39	< 0.005	< 0.005	0.08	0.08	< 0.005	0.02	0.02
Average Daily	—	—	—	—	—	—	—	—	—	—
Mobile	0.05	0.04	0.35	< 0.005	< 0.005	0.07	0.07	< 0.005	0.02	0.02
Area	0.06	< 0.005	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Energy	< 0.005	0.01	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Water	—	—	—	—	—	—	—	—	—	—
Waste	—	—	—	—	—	—	—	—	—	—
Refrig.	—	—	—	—	—	—	—	—	—	—
Total	0.11	0.05	0.43	< 0.005	< 0.005	0.07	0.07	< 0.005	0.02	0.02
Annual	—	—	—	—	—	—	—	—	—	—
Mobile	0.01	0.01	0.06	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005
Area	0.01	< 0.005	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Energy	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Water	—	—	—	—	—	—	—	—	—	—
Waste	—	—	—	—	—	—	—	—	—	—
Refrig.	—	—	—	—	—	—	—	—	—	—
Total	0.02	0.01	0.08	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Low Rise	0.05	0.04	0.41	< 0.005	< 0.005	0.08	0.08	< 0.005	0.02	0.02
Total	0.05	0.04	0.41	< 0.005	< 0.005	0.08	0.08	< 0.005	0.02	0.02
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Low Rise	0.05	0.04	0.38	< 0.005	< 0.005	0.08	0.08	< 0.005	0.02	0.02
Total	0.05	0.04	0.38	< 0.005	< 0.005	0.08	0.08	< 0.005	0.02	0.02
Annual	—	—	—	—	—	—	—	—	—	—
Apartments Low Rise	0.01	0.01	0.06	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005
Total	0.01	0.01	0.06	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Low Rise	< 0.005	0.01	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Total	< 0.005	0.01	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Low Rise	< 0.005	0.01	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Total	< 0.005	0.01	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Annual	—	—	—	—	—	—	—	—	—	—
Apartments Low Rise	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Total	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005

4.3. Area Emissions by Source

4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Consumer Products	0.05	—	—	—	—	—	—	—	—	—
Architectural Coatings	< 0.005	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.01	< 0.005	0.11	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Total	0.07	< 0.005	0.11	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Consumer Products	0.05	—	—	—	—	—	—	—	—	—
Architectural Coatings	< 0.005	—	—	—	—	—	—	—	—	—
Total	0.06	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Consumer Products	0.01	—	—	—	—	—	—	—	—	—
Architectural Coatings	< 0.005	—	—	—	—	—	—	—	—	—
Landscape Equipment	< 0.005	< 0.005	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Total	0.01	< 0.005	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—

Avoided	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Apartments Low Rise	14.6	16.3	12.6	5,321	103	114	88.0	37,262

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

Hearth Type	Unmitigated (number)
Apartments Low Rise	—
Wood Fireplaces	0
Gas Fireplaces	0
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	2

Conventional Wood Stoves	0
Catalytic Wood Stoves	0
Non-Catalytic Wood Stoves	0
Pellet Wood Stoves	0

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
5052.375	1,684	0.00	0.00	—

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	250

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Apartments Low Rise	7,158	690	0.0489	0.0069	45,286

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Apartments Low Rise	74,548	59,994

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Apartments Low Rise	1.50	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Apartments Low Rise	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Apartments Low Rise	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
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5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor
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5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)
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5.17. User Defined

Equipment Type	Fuel Type
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5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres
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5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
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5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)
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6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	5.68	annual days of extreme heat
Extreme Precipitation	5.50	annual days with precipitation above 20 mm

Sea Level Rise	—	meters of inundation depth
Wildfire	0.00	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters

Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	0	0	0	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	0	0	0	N/A
Wildfire	0	0	0	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	1	1	1	2

Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	1	1	2
Wildfire	1	1	1	2
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	53.7
AQ-PM	70.3
AQ-DPM	87.4
Drinking Water	52.7
Lead Risk Housing	50.8
Pesticides	0.00
Toxic Releases	74.8
Traffic	79.4
Effect Indicators	—

CleanUp Sites	7.71
Groundwater	44.2
Haz Waste Facilities/Generators	55.4
Impaired Water Bodies	0.00
Solid Waste	0.00
Sensitive Population	—
Asthma	7.98
Cardio-vascular	16.5
Low Birth Weights	17.0
Socioeconomic Factor Indicators	—
Education	22.2
Housing	37.5
Linguistic	62.7
Poverty	23.7
Unemployment	49.9

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	69.01065058
Employed	74.81072758
Median HI	76.9665084
Education	—
Bachelor's or higher	94.43089953
High school enrollment	100
Preschool enrollment	89.76004106
Transportation	—

Auto Access	95.6242782
Active commuting	62.06852303
Social	—
2-parent households	37.05889901
Voting	51.55909149
Neighborhood	—
Alcohol availability	29.56499423
Park access	16.01437187
Retail density	95.8039266
Supermarket access	59.78442192
Tree canopy	52.39317336
Housing	—
Homeownership	34.89028615
Housing habitability	62.20967535
Low-inc homeowner severe housing cost burden	78.3908636
Low-inc renter severe housing cost burden	75.63197742
Uncrowded housing	50.73784165
Health Outcomes	—
Insured adults	74.51559091
Arthritis	60.6
Asthma ER Admissions	94.1
High Blood Pressure	58.0
Cancer (excluding skin)	16.1
Asthma	83.3
Coronary Heart Disease	66.7
Chronic Obstructive Pulmonary Disease	84.0
Diagnosed Diabetes	91.2
Life Expectancy at Birth	99.0

Cognitively Disabled	29.3
Physically Disabled	57.4
Heart Attack ER Admissions	67.3
Mental Health Not Good	90.9
Chronic Kidney Disease	79.8
Obesity	86.9
Pedestrian Injuries	65.6
Physical Health Not Good	90.6
Stroke	80.6
Health Risk Behaviors	—
Binge Drinking	26.9
Current Smoker	91.5
No Leisure Time for Physical Activity	96.9
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	69.7
Elderly	28.2
English Speaking	45.5
Foreign-born	62.1
Outdoor Workers	95.9
Climate Change Adaptive Capacity	—
Impervious Surface Cover	24.7
Traffic Density	71.7
Traffic Access	87.4
Other Indices	—
Hardship	17.8
Other Decision Support	—

2016 Voting	47.2
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7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	27.0
Healthy Places Index Score for Project Location (b)	80.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
 b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Land Use	—
Operations: Hearths	—



DOUGLASKIM+ASSOCIATES,LLC

FUTURE EMISSIONS

10535 Missouri Avenue (Project) Detailed Report

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8. User Changes to Default Data

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	10535 Missouri Avenue (Project)
Construction Start Date	1/1/2026
Operational Year	2028
Lead Agency	City of Los Angeles
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.70
Precipitation (days)	19.6
Location	10535 Missouri Ave, West Los Angeles, CA 90025, USA
County	Los Angeles-South Coast
City	Los Angeles
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	4321
EDFZ	16
Electric Utility	Los Angeles Department of Water & Power
Gas Utility	Southern California Gas
App Version	2022.1.1.29

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Apartments Mid Rise	39.0	Dwelling Unit	0.35	34,090	524	—	95.0	—

Enclosed Parking with Elevator	66.0	Space	0.59	26,400	0.00	—	—	—
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1.3. User-Selected Emission Reduction Measures by Emissions Sector

Sector	#	Measure Title
Energy	E-15	Require All-Electric Development

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Unmit.	2.84	13.5	13.0	0.03	0.50	2.89	3.40	0.46	1.22	1.68
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Unmit.	2.84	5.88	10.6	0.02	0.19	0.69	0.88	0.18	0.16	0.34
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—
Unmit.	0.97	4.09	6.89	0.01	0.15	0.50	0.65	0.14	0.15	0.29
Annual (Max)	—	—	—	—	—	—	—	—	—	—
Unmit.	0.18	0.75	1.26	< 0.005	0.03	0.09	0.12	0.02	0.03	0.05

2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—

2026	1.28	13.5	13.0	0.03	0.50	2.89	3.40	0.46	1.22	1.68
2027	2.84	5.83	11.0	0.02	0.19	0.69	0.88	0.17	0.16	0.34
2028	0.60	4.70	9.24	0.01	0.15	0.58	0.74	0.14	0.14	0.28
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—
2026	0.64	5.28	9.21	0.01	0.19	0.58	0.78	0.18	0.14	0.32
2027	2.84	5.88	10.6	0.02	0.19	0.69	0.88	0.17	0.16	0.34
2028	2.81	5.57	10.4	0.02	0.17	0.69	0.85	0.15	0.16	0.32
Average Daily	—	—	—	—	—	—	—	—	—	—
2026	0.47	4.09	6.31	0.01	0.15	0.50	0.65	0.14	0.15	0.29
2027	0.97	3.79	6.89	0.01	0.13	0.44	0.56	0.12	0.10	0.22
2028	0.28	1.17	2.22	< 0.005	0.04	0.14	0.18	0.03	0.03	0.07
Annual	—	—	—	—	—	—	—	—	—	—
2026	0.09	0.75	1.15	< 0.005	0.03	0.09	0.12	0.02	0.03	0.05
2027	0.18	0.69	1.26	< 0.005	0.02	0.08	0.10	0.02	0.02	0.04
2028	0.05	0.21	0.41	< 0.005	0.01	0.03	0.03	0.01	0.01	0.01

2.3. Construction Emissions by Year, Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—
2026	1.28	13.5	13.0	0.03	0.50	2.89	3.40	0.46	1.22	1.68
2027	2.84	5.83	11.0	0.02	0.19	0.69	0.88	0.17	0.16	0.34
2028	0.60	4.70	9.24	0.01	0.15	0.58	0.74	0.14	0.14	0.28
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—
2026	0.64	5.28	9.21	0.01	0.19	0.58	0.78	0.18	0.14	0.32
2027	2.84	5.88	10.6	0.02	0.19	0.69	0.88	0.17	0.16	0.34

2028	2.81	5.57	10.4	0.02	0.17	0.69	0.85	0.15	0.16	0.32
Average Daily	—	—	—	—	—	—	—	—	—	—
2026	0.47	4.09	6.31	0.01	0.15	0.50	0.65	0.14	0.15	0.29
2027	0.97	3.79	6.89	0.01	0.13	0.44	0.56	0.12	0.10	0.22
2028	0.28	1.17	2.22	< 0.005	0.04	0.14	0.18	0.03	0.03	0.07
Annual	—	—	—	—	—	—	—	—	—	—
2026	0.09	0.75	1.15	< 0.005	0.03	0.09	0.12	0.02	0.03	0.05
2027	0.18	0.69	1.26	< 0.005	0.02	0.08	0.10	0.02	0.02	0.04
2028	0.05	0.21	0.41	< 0.005	0.01	0.03	0.03	0.01	0.01	0.01

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Unmit.	1.60	0.38	6.34	0.01	0.02	0.65	0.66	0.01	0.16	0.18
Mit.	1.60	0.29	6.30	0.01	0.01	0.65	0.65	0.01	0.16	0.17
% Reduced	< 0.5%	26%	1%	—	52%	—	1%	56%	—	4%
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Unmit.	1.22	0.38	2.80	0.01	0.01	0.65	0.66	0.01	0.16	0.18
Mit.	1.21	0.28	2.76	0.01	< 0.005	0.65	0.65	< 0.005	0.16	0.17
% Reduced	< 0.5%	26%	1%	—	65%	—	1%	67%	—	4%
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—
Unmit.	1.47	0.40	5.17	0.01	0.01	0.64	0.65	0.01	0.16	0.18
Mit.	1.47	0.30	5.12	0.01	0.01	0.64	0.64	0.01	0.16	0.17
% Reduced	< 0.5%	25%	1%	—	56%	—	1%	59%	—	5%
Annual (Max)	—	—	—	—	—	—	—	—	—	—

Unmit.	0.27	0.07	0.94	< 0.005	< 0.005	0.12	0.12	< 0.005	0.03	0.03
Mit.	0.27	0.05	0.94	< 0.005	< 0.005	0.12	0.12	< 0.005	0.03	0.03
% Reduced	< 0.5%	25%	1%	8%	56%	—	1%	59%	—	5%

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Mobile	0.42	0.25	2.93	0.01	< 0.005	0.65	0.65	< 0.005	0.16	0.17
Area	1.18	0.03	3.36	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Energy	0.01	0.10	0.04	< 0.005	0.01	—	0.01	0.01	—	0.01
Water	—	—	—	—	—	—	—	—	—	—
Waste	—	—	—	—	—	—	—	—	—	—
Refrig.	—	—	—	—	—	—	—	—	—	—
Total	1.60	0.38	6.34	0.01	0.02	0.65	0.66	0.01	0.16	0.18
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Mobile	0.42	0.28	2.76	0.01	< 0.005	0.65	0.65	< 0.005	0.16	0.17
Area	0.79	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Energy	0.01	0.10	0.04	< 0.005	0.01	—	0.01	0.01	—	0.01
Water	—	—	—	—	—	—	—	—	—	—
Waste	—	—	—	—	—	—	—	—	—	—
Refrig.	—	—	—	—	—	—	—	—	—	—
Total	1.22	0.38	2.80	0.01	0.01	0.65	0.66	0.01	0.16	0.18
Average Daily	—	—	—	—	—	—	—	—	—	—
Mobile	0.41	0.28	2.82	0.01	< 0.005	0.64	0.64	< 0.005	0.16	0.17
Area	1.05	0.02	2.30	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Energy	0.01	0.10	0.04	< 0.005	0.01	—	0.01	0.01	—	0.01

Water	—	—	—	—	—	—	—	—	—	—
Waste	—	—	—	—	—	—	—	—	—	—
Refrig.	—	—	—	—	—	—	—	—	—	—
Total	1.47	0.40	5.17	0.01	0.01	0.64	0.65	0.01	0.16	0.18
Annual	—	—	—	—	—	—	—	—	—	—
Mobile	0.08	0.05	0.51	< 0.005	< 0.005	0.12	0.12	< 0.005	0.03	0.03
Area	0.19	< 0.005	0.42	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Energy	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Water	—	—	—	—	—	—	—	—	—	—
Waste	—	—	—	—	—	—	—	—	—	—
Refrig.	—	—	—	—	—	—	—	—	—	—
Total	0.27	0.07	0.94	< 0.005	< 0.005	0.12	0.12	< 0.005	0.03	0.03

2.6. Operations Emissions by Sector, Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Mobile	0.42	0.25	2.93	0.01	< 0.005	0.65	0.65	< 0.005	0.16	0.17
Area	1.18	0.03	3.36	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Energy	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Water	—	—	—	—	—	—	—	—	—	—
Waste	—	—	—	—	—	—	—	—	—	—
Refrig.	—	—	—	—	—	—	—	—	—	—
Total	1.60	0.29	6.30	0.01	0.01	0.65	0.65	0.01	0.16	0.17
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Mobile	0.42	0.28	2.76	0.01	< 0.005	0.65	0.65	< 0.005	0.16	0.17
Area	0.79	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00

Energy	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Water	—	—	—	—	—	—	—	—	—	—
Waste	—	—	—	—	—	—	—	—	—	—
Refrig.	—	—	—	—	—	—	—	—	—	—
Total	1.21	0.28	2.76	0.01	< 0.005	0.65	0.65	< 0.005	0.16	0.17
Average Daily	—	—	—	—	—	—	—	—	—	—
Mobile	0.41	0.28	2.82	0.01	< 0.005	0.64	0.64	< 0.005	0.16	0.17
Area	1.05	0.02	2.30	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Energy	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Water	—	—	—	—	—	—	—	—	—	—
Waste	—	—	—	—	—	—	—	—	—	—
Refrig.	—	—	—	—	—	—	—	—	—	—
Total	1.47	0.30	5.12	0.01	0.01	0.64	0.64	0.01	0.16	0.17
Annual	—	—	—	—	—	—	—	—	—	—
Mobile	0.08	0.05	0.51	< 0.005	< 0.005	0.12	0.12	< 0.005	0.03	0.03
Area	0.19	< 0.005	0.42	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Energy	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Water	—	—	—	—	—	—	—	—	—	—
Waste	—	—	—	—	—	—	—	—	—	—
Refrig.	—	—	—	—	—	—	—	—	—	—
Total	0.27	0.05	0.94	< 0.005	< 0.005	0.12	0.12	< 0.005	0.03	0.03

3. Construction Emissions Details

3.1. Demolition (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.44	4.09	5.58	0.01	0.13	—	0.13	0.12	—	0.12
Demolition	—	—	—	—	—	0.13	0.13	—	0.02	0.02
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.47	0.64	< 0.005	0.02	—	0.02	0.01	—	0.01
Demolition	—	—	—	—	—	0.02	0.02	—	< 0.005	< 0.005
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.09	0.12	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Demolition	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.04	0.55	0.00	0.00	0.13	0.13	0.00	0.03	0.03
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.20	0.08	< 0.005	< 0.005	0.04	0.05	< 0.005	0.01	0.01
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	0.01	0.07	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.02	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005
Annual	—	—	—	—	—	—	—	—	—	—

Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005

3.2. Demolition (2026) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.44	4.09	5.58	0.01	0.13	—	0.13	0.12	—	0.12
Demolition	—	—	—	—	—	0.13	0.13	—	0.02	0.02
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.47	0.64	< 0.005	0.02	—	0.02	0.01	—	0.01
Demolition	—	—	—	—	—	0.02	0.02	—	< 0.005	< 0.005
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.09	0.12	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Demolition	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—

Worker	0.04	0.04	0.55	0.00	0.00	0.13	0.13	0.00	0.03	0.03
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.20	0.08	< 0.005	< 0.005	0.04	0.05	< 0.005	0.01	0.01
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	0.01	0.07	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.02	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005
Annual	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005

3.3. Site Preparation (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.44	3.74	5.54	0.01	0.19	—	0.19	0.17	—	0.17
Dust From Material Movement	—	—	—	—	—	0.21	0.21	—	0.02	0.02
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.23	0.33	< 0.005	0.01	—	0.01	0.01	—	0.01

Dust From Material Movement	—	—	—	—	—	0.01	0.01	—	< 0.005	< 0.005
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.04	0.06	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Dust From Material Movement	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.28	0.00	0.00	0.07	0.07	0.00	0.02	0.02
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.05	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005
Annual	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005

3.4. Site Preparation (2026) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
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Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.44	3.74	5.54	0.01	0.19	—	0.19	0.17	—	0.17
Dust From Material Movement	—	—	—	—	—	0.21	0.21	—	0.02	0.02
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.23	0.33	< 0.005	0.01	—	0.01	0.01	—	0.01
Dust From Material Movement	—	—	—	—	—	0.01	0.01	—	< 0.005	< 0.005
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.04	0.06	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Dust From Material Movement	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.28	0.00	0.00	0.07	0.07	0.00	0.02	0.02
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.05	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005

Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005
Annual	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005

3.5. Grading (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.02	9.19	9.69	0.02	0.42	—	0.42	0.39	—	0.39
Dust From Material Movement	—	—	—	—	—	2.08	2.08	—	1.00	1.00
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.06	0.55	0.58	< 0.005	0.03	—	0.03	0.02	—	0.02
Dust From Material Movement	—	—	—	—	—	0.13	0.13	—	0.06	0.06
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.01	0.10	0.11	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Dust From Material Movement	—	—	—	—	—	0.02	0.02	—	0.01	0.01
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.48	0.00	0.00	0.10	0.10	0.00	0.02	0.02
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.04	3.02	1.19	0.02	0.03	0.69	0.72	0.03	0.19	0.22
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.19	0.07	< 0.005	< 0.005	0.04	0.04	< 0.005	0.01	0.01
Annual	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.03	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005

3.6. Grading (2026) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.02	9.19	9.69	0.02	0.42	—	0.42	0.39	—	0.39

Dust From Material Movement	—	—	—	—	—	2.08	2.08	—	1.00	1.00
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.06	0.55	0.58	< 0.005	0.03	—	0.03	0.02	—	0.02
Dust From Material Movement	—	—	—	—	—	0.13	0.13	—	0.06	0.06
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.10	0.11	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Dust From Material Movement	—	—	—	—	—	0.02	0.02	—	0.01	0.01
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.48	0.00	0.00	0.10	0.10	0.00	0.02	0.02
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.04	3.02	1.19	0.02	0.03	0.69	0.72	0.03	0.19	0.22
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.19	0.07	< 0.005	< 0.005	0.04	0.04	< 0.005	0.01	0.01

Annual	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.03	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005

3.7. Building Construction (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.49	4.81	6.91	0.01	0.19	—	0.19	0.17	—	0.17
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.49	4.81	6.91	0.01	0.19	—	0.19	0.17	—	0.17
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.24	2.30	3.31	0.01	0.09	—	0.09	0.08	—	0.08
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.42	0.60	< 0.005	0.02	—	0.02	0.02	—	0.02
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.14	0.15	2.53	0.00	0.00	0.51	0.51	0.00	0.12	0.12

Vendor	0.01	0.29	0.14	< 0.005	< 0.005	0.07	0.08	< 0.005	0.02	0.02
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.14	0.17	2.16	0.00	0.00	0.51	0.51	0.00	0.12	0.12
Vendor	0.01	0.31	0.14	< 0.005	< 0.005	0.07	0.08	< 0.005	0.02	0.02
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.09	1.08	0.00	0.00	0.24	0.24	0.00	0.06	0.06
Vendor	< 0.005	0.15	0.07	< 0.005	< 0.005	0.03	0.04	< 0.005	0.01	0.01
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.02	0.20	0.00	0.00	0.04	0.04	0.00	0.01	0.01
Vendor	< 0.005	0.03	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.8. Building Construction (2026) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.49	4.81	6.91	0.01	0.19	—	0.19	0.17	—	0.17
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.49	4.81	6.91	0.01	0.19	—	0.19	0.17	—	0.17
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.24	2.30	3.31	0.01	0.09	—	0.09	0.08	—	0.08
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.42	0.60	< 0.005	0.02	—	0.02	0.02	—	0.02
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.14	0.15	2.53	0.00	0.00	0.51	0.51	0.00	0.12	0.12
Vendor	0.01	0.29	0.14	< 0.005	< 0.005	0.07	0.08	< 0.005	0.02	0.02
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.14	0.17	2.16	0.00	0.00	0.51	0.51	0.00	0.12	0.12
Vendor	0.01	0.31	0.14	< 0.005	< 0.005	0.07	0.08	< 0.005	0.02	0.02
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.09	1.08	0.00	0.00	0.24	0.24	0.00	0.06	0.06
Vendor	< 0.005	0.15	0.07	< 0.005	< 0.005	0.03	0.04	< 0.005	0.01	0.01
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.02	0.20	0.00	0.00	0.04	0.04	0.00	0.01	0.01
Vendor	< 0.005	0.03	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.9. Building Construction (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.48	4.56	6.90	0.01	0.17	—	0.17	0.15	—	0.15
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.48	4.56	6.90	0.01	0.17	—	0.17	0.15	—	0.15
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.34	3.25	4.93	0.01	0.12	—	0.12	0.11	—	0.11
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.06	0.59	0.90	< 0.005	0.02	—	0.02	0.02	—	0.02
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.14	0.14	2.35	0.00	0.00	0.51	0.51	0.00	0.12	0.12
Vendor	0.01	0.28	0.13	< 0.005	< 0.005	0.07	0.07	< 0.005	0.02	0.02
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.14	0.17	1.99	0.00	0.00	0.51	0.51	0.00	0.12	0.12
Vendor	0.01	0.29	0.14	< 0.005	< 0.005	0.07	0.07	< 0.005	0.02	0.02

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	0.10	0.12	1.50	0.00	0.00	0.36	0.36	0.00	0.08	0.08
Vendor	0.01	0.21	0.10	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.02
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.27	0.00	0.00	0.07	0.07	0.00	0.02	0.02
Vendor	< 0.005	0.04	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.10. Building Construction (2027) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.48	4.56	6.90	0.01	0.17	—	0.17	0.15	—	0.15
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.48	4.56	6.90	0.01	0.17	—	0.17	0.15	—	0.15
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.34	3.25	4.93	0.01	0.12	—	0.12	0.11	—	0.11
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.06	0.59	0.90	< 0.005	0.02	—	0.02	0.02	—	0.02
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.14	0.14	2.35	0.00	0.00	0.51	0.51	0.00	0.12	0.12
Vendor	0.01	0.28	0.13	< 0.005	< 0.005	0.07	0.07	< 0.005	0.02	0.02
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.14	0.17	1.99	0.00	0.00	0.51	0.51	0.00	0.12	0.12
Vendor	0.01	0.29	0.14	< 0.005	< 0.005	0.07	0.07	< 0.005	0.02	0.02
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	0.10	0.12	1.50	0.00	0.00	0.36	0.36	0.00	0.08	0.08
Vendor	0.01	0.21	0.10	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.02
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.27	0.00	0.00	0.07	0.07	0.00	0.02	0.02
Vendor	< 0.005	0.04	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.11. Building Construction (2028) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.46	4.30	6.91	0.01	0.15	—	0.15	0.14	—	0.14
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.46	4.30	6.91	0.01	0.15	—	0.15	0.14	—	0.14
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.11	1.02	1.64	< 0.005	0.04	—	0.04	0.03	—	0.03
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.19	0.30	< 0.005	0.01	—	0.01	0.01	—	0.01
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.13	0.13	2.21	0.00	0.00	0.51	0.51	0.00	0.12	0.12
Vendor	0.01	0.27	0.13	< 0.005	< 0.005	0.07	0.07	< 0.005	0.02	0.02
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.13	0.15	1.88	0.00	0.00	0.51	0.51	0.00	0.12	0.12
Vendor	0.01	0.28	0.13	< 0.005	< 0.005	0.07	0.07	< 0.005	0.02	0.02
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.04	0.47	0.00	0.00	0.12	0.12	0.00	0.03	0.03
Vendor	< 0.005	0.07	0.03	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	0.01
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Annual	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.08	0.00	0.00	0.02	0.02	0.00	0.01	0.01
Vendor	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.12. Building Construction (2028) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.46	4.30	6.91	0.01	0.15	—	0.15	0.14	—	0.14
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.46	4.30	6.91	0.01	0.15	—	0.15	0.14	—	0.14
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.11	1.02	1.64	< 0.005	0.04	—	0.04	0.03	—	0.03
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.19	0.30	< 0.005	0.01	—	0.01	0.01	—	0.01
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.13	0.13	2.21	0.00	0.00	0.51	0.51	0.00	0.12	0.12

Vendor	0.01	0.27	0.13	< 0.005	< 0.005	0.07	0.07	< 0.005	0.02	0.02
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.13	0.15	1.88	0.00	0.00	0.51	0.51	0.00	0.12	0.12
Vendor	0.01	0.28	0.13	< 0.005	< 0.005	0.07	0.07	< 0.005	0.02	0.02
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.04	0.47	0.00	0.00	0.12	0.12	0.00	0.03	0.03
Vendor	< 0.005	0.07	0.03	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	0.01
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.08	0.00	0.00	0.02	0.02	0.00	0.01	0.01
Vendor	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.13. Architectural Coating (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.11	0.83	1.13	< 0.005	0.02	—	0.02	0.02	—	0.02
Architectural Coatings	2.08	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.11	0.83	1.13	< 0.005	0.02	—	0.02	0.02	—	0.02
Architectural Coatings	2.08	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.20	0.27	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Architectural Coatings	0.50	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.04	0.05	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Architectural Coatings	0.09	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.47	0.00	0.00	0.10	0.10	0.00	0.02	0.02
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.40	0.00	0.00	0.10	0.10	0.00	0.02	0.02
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.10	0.00	0.00	0.02	0.02	0.00	0.01	0.01
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.14. Architectural Coating (2027) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.11	0.83	1.13	< 0.005	0.02	—	0.02	0.02	—	0.02
Architectural Coatings	2.08	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.11	0.83	1.13	< 0.005	0.02	—	0.02	0.02	—	0.02
Architectural Coatings	2.08	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.20	0.27	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Architectural Coatings	0.50	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	< 0.005	0.04	0.05	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Architectural Coatings	0.09	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.47	0.00	0.00	0.10	0.10	0.00	0.02	0.02
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.40	0.00	0.00	0.10	0.10	0.00	0.02	0.02
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.10	0.00	0.00	0.02	0.02	0.00	0.01	0.01
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.15. Architectural Coating (2028) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.11	0.81	1.12	< 0.005	0.02	—	0.02	0.01	—	0.01
Architectural Coatings	2.08	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.05	0.07	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Architectural Coatings	0.13	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Architectural Coatings	0.02	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.38	0.00	0.00	0.10	0.10	0.00	0.02	0.02
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.02	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.16. Architectural Coating (2028) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.11	0.81	1.12	< 0.005	0.02	—	0.02	0.01	—	0.01
Architectural Coatings	2.08	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.05	0.07	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Architectural Coatings	0.13	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Architectural Coatings	0.02	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.38	0.00	0.00	0.10	0.10	0.00	0.02	0.02
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.02	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.17. Trenching (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.18	1.25	1.43	< 0.005	0.05	—	0.05	0.05	—	0.05
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.01	0.08	0.09	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.01	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.16	0.00	0.00	0.03	0.03	0.00	0.01	0.01
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.18. Trenching (2026) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.18	1.25	1.43	< 0.005	0.05	—	0.05	0.05	—	0.05
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.08	0.09	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.01	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.16	0.00	0.00	0.03	0.03	0.00	0.01	0.01
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Mobile source emissions results are presented in Sections 2.6. No further detailed breakdown of emissions is available.

4.1.2. Mitigated

Mobile source emissions results are presented in Sections 2.5. No further detailed breakdown of emissions is available.

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—

Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.2.2. Electricity Emissions By Land Use - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	0.01	0.10	0.04	< 0.005	0.01	—	0.01	0.01	—	0.01
Enclosed Parking with Elevator	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Total	0.01	0.10	0.04	< 0.005	0.01	—	0.01	0.01	—	0.01
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	0.01	0.10	0.04	< 0.005	0.01	—	0.01	0.01	—	0.01
Enclosed Parking with Elevator	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Total	0.01	0.10	0.04	< 0.005	0.01	—	0.01	0.01	—	0.01
Annual	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Enclosed Parking with Elevator	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Total	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005

4.2.4. Natural Gas Emissions By Land Use - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—

Apartments Mid Rise	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Enclosed Parking with Elevator	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Total	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Enclosed Parking with Elevator	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Total	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Enclosed Parking with Elevator	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Total	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00

4.3. Area Emissions by Source

4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Consumer Products	0.73	—	—	—	—	—	—	—	—	—

Architectural Coatings	0.06	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.38	0.03	3.36	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Total	1.18	0.03	3.36	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Consumer Products	0.73	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.06	—	—	—	—	—	—	—	—	—
Total	0.79	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Consumer Products	0.13	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.01	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.05	< 0.005	0.42	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Total	0.19	< 0.005	0.42	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005

4.3.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Consumer Products	0.73	—	—	—	—	—	—	—	—	—

Architectural Coatings	0.06	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.38	0.03	3.36	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Total	1.18	0.03	3.36	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Consumer Products	0.73	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.06	—	—	—	—	—	—	—	—	—
Total	0.79	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Consumer Products	0.13	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.01	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.05	< 0.005	0.42	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Total	0.19	< 0.005	0.42	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—

Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.4.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—

Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.5.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—

Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.6.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—

Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.7.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
----------------	-----	-----	----	-----	-------	-------	-------	--------	--------	--------

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.8.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.9.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—
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4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—

4.10.4. Soil Carbon Accumulation By Vegetation Type - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.10.5. Above and Belowground Carbon Accumulation by Land Use Type - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.10.6. Avoided and Sequestered Emissions by Species - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—

Avoided	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Demolition	Demolition	1/1/2026	2/28/2026	5.00	42.0	—
Site Preparation	Site Preparation	3/1/2026	3/31/2026	5.00	22.0	—
Grading	Grading	4/1/2026	4/30/2026	5.00	22.0	—
Building Construction	Building Construction	5/1/2026	4/30/2028	5.00	521	—
Architectural Coating	Architectural Coating	9/1/2027	1/31/2028	5.00	109	—
Trenching	Trenching	4/1/2026	4/30/2026	5.00	22.0	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Tractors/Loaders/Back hoes	Diesel	Average	2.00	6.00	84.0	0.37
Demolition	Rubber Tired Dozers	Diesel	Average	1.00	1.00	367	0.40
Demolition	Concrete/Industrial Saws	Diesel	Average	1.00	8.00	33.0	0.73
Site Preparation	Graders	Diesel	Average	1.00	8.00	148	0.41
Site Preparation	Tractors/Loaders/Back hoes	Diesel	Average	1.00	8.00	84.0	0.37
Grading	Graders	Diesel	Average	1.00	6.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	6.00	367	0.40
Grading	Tractors/Loaders/Back hoes	Diesel	Average	1.00	7.00	84.0	0.37
Building Construction	Cranes	Diesel	Average	1.00	4.00	367	0.29
Building Construction	Forklifts	Diesel	Average	2.00	6.00	82.0	0.20
Building Construction	Tractors/Loaders/Back hoes	Diesel	Average	2.00	8.00	84.0	0.37
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48
Trenching	Trenchers	Diesel	Average	1.00	8.00	40.0	0.50

5.2.2. Mitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Tractors/Loaders/Back hoes	Diesel	Average	2.00	6.00	84.0	0.37
Demolition	Rubber Tired Dozers	Diesel	Average	1.00	1.00	367	0.40
Demolition	Concrete/Industrial Saws	Diesel	Average	1.00	8.00	33.0	0.73
Site Preparation	Graders	Diesel	Average	1.00	8.00	148	0.41
Site Preparation	Tractors/Loaders/Back hoes	Diesel	Average	1.00	8.00	84.0	0.37
Grading	Graders	Diesel	Average	1.00	6.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	6.00	367	0.40
Grading	Tractors/Loaders/Back hoes	Diesel	Average	1.00	7.00	84.0	0.37
Building Construction	Cranes	Diesel	Average	1.00	4.00	367	0.29
Building Construction	Forklifts	Diesel	Average	2.00	6.00	82.0	0.20
Building Construction	Tractors/Loaders/Back hoes	Diesel	Average	2.00	8.00	84.0	0.37
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48
Trenching	Trenchers	Diesel	Average	1.00	8.00	40.0	0.50

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	—	—	—	—
Demolition	Worker	10.0	18.5	LDA,LDT1,LDT2
Demolition	Vendor	—	10.2	HHDT,MHDT
Demolition	Hauling	2.38	20.0	HHDT

Demolition	Onsite truck	—	—	HHDT
Site Preparation	—	—	—	—
Site Preparation	Worker	5.00	18.5	LDA,LDT1,LDT2
Site Preparation	Vendor	—	10.2	HHDT,MHDT
Site Preparation	Hauling	0.59	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	7.50	18.5	LDA,LDT1,LDT2
Grading	Vendor	—	10.2	HHDT,MHDT
Grading	Hauling	37.0	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	39.2	18.5	LDA,LDT1,LDT2
Building Construction	Vendor	8.50	10.2	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	7.83	18.5	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	10.2	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT
Trenching	—	—	—	—
Trenching	Worker	2.50	18.5	LDA,LDT1,LDT2
Trenching	Vendor	—	10.2	HHDT,MHDT
Trenching	Hauling	0.00	20.0	HHDT
Trenching	Onsite truck	—	—	HHDT

5.3.2. Mitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	—	—	—	—
Demolition	Worker	10.0	18.5	LDA,LDT1,LDT2
Demolition	Vendor	—	10.2	HHDT,MHDT
Demolition	Hauling	2.38	20.0	HHDT
Demolition	Onsite truck	—	—	HHDT
Site Preparation	—	—	—	—
Site Preparation	Worker	5.00	18.5	LDA,LDT1,LDT2
Site Preparation	Vendor	—	10.2	HHDT,MHDT
Site Preparation	Hauling	0.59	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	7.50	18.5	LDA,LDT1,LDT2
Grading	Vendor	—	10.2	HHDT,MHDT
Grading	Hauling	37.0	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	39.2	18.5	LDA,LDT1,LDT2
Building Construction	Vendor	8.50	10.2	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	7.83	18.5	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	10.2	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT
Trenching	—	—	—	—
Trenching	Worker	2.50	18.5	LDA,LDT1,LDT2

Trenching	Vendor	—	10.2	HHDT,MHDT
Trenching	Hauling	0.00	20.0	HHDT
Trenching	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	69,032	23,011	1,157	129	1,543

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (Cubic Yards)	Material Exported (Cubic Yards)	Acres Graded (acres)	Material Demolished (Ton of Debris)	Acres Paved (acres)
Demolition	0.00	0.00	0.00	400	—
Site Preparation	—	100	11.0	0.00	—
Grading	—	6,500	16.5	0.00	—

5.6.2. Construction Earthmoving Control Strategies

Control Strategies Applied	Frequency (per day)	PM10 Reduction	PM2.5 Reduction
Water Exposed Area	2	61%	61%
Water Demolished Area	2	36%	36%

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Apartments Mid Rise	—	0%
Enclosed Parking with Elevator	0.59	100%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2026	0.00	690	0.05	0.01
2027	0.00	690	0.05	0.01
2028	0.00	690	0.05	0.01

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMt/Weekday	VMt/Saturday	VMt/Sunday	VMt/Year
Total all Land Uses	148	148	148	54,020	911	911	911	332,515

5.9.2. Mitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMt/Weekday	VMt/Saturday	VMt/Sunday	VMt/Year
Total all Land Uses	148	148	148	54,020	911	911	911	332,515

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

Hearth Type	Unmitigated (number)
Apartments Mid Rise	—

Wood Fireplaces	0
Gas Fireplaces	0
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	39
Conventional Wood Stoves	0
Catalytic Wood Stoves	0
Non-Catalytic Wood Stoves	0
Pellet Wood Stoves	0

5.10.1.2. Mitigated

Hearth Type	Unmitigated (number)
Apartments Mid Rise	—
Wood Fireplaces	0
Gas Fireplaces	0
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	39
Conventional Wood Stoves	0
Catalytic Wood Stoves	0
Non-Catalytic Wood Stoves	0
Pellet Wood Stoves	0

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
69032.25	23,011	1,157	129	1,543

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	250

5.10.4. Landscape Equipment - Mitigated

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	250

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Apartments Mid Rise	128,056	690	0.0489	0.0069	387,089
Enclosed Parking with Elevator	97,454	690	0.0489	0.0069	0.00

5.11.2. Mitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Apartments Mid Rise	129,497	690	0.0489	0.0069	0.00
Enclosed Parking with Elevator	97,454	690	0.0489	0.0069	0.00

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Apartments Mid Rise	1,453,678	8,982
Enclosed Parking with Elevator	0.00	0.00

5.12.2. Mitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Apartments Mid Rise	1,453,678	8,982
Enclosed Parking with Elevator	0.00	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Apartments Mid Rise	23.7	—
Enclosed Parking with Elevator	0.00	—

5.13.2. Mitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Apartments Mid Rise	23.7	—
Enclosed Parking with Elevator	0.00	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
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Apartments Mid Rise	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Apartments Mid Rise	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00

5.14.2. Mitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Apartments Mid Rise	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Apartments Mid Rise	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
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5.15.2. Mitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
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5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor
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5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)
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5.17. User Defined

Equipment Type	Fuel Type
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5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres
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5.18.1.2. Mitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres
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5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
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5.18.1.2. Mitigated

Biomass Cover Type	Initial Acres	Final Acres
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5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)
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5.18.2.2. Mitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)
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6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	5.68	annual days of extreme heat
Extreme Precipitation	5.50	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	0.00	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about $\frac{3}{4}$ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters

Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	1	0	0	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	0	0	N/A
Wildfire	1	0	0	N/A

Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	1	1	1	2
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	1	1	2
Wildfire	1	1	1	2
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	53.7
AQ-PM	70.3
AQ-DPM	87.4
Drinking Water	52.7
Lead Risk Housing	50.8
Pesticides	0.00
Toxic Releases	74.8
Traffic	79.4
Effect Indicators	—
CleanUp Sites	7.71
Groundwater	44.2
Haz Waste Facilities/Generators	55.4
Impaired Water Bodies	0.00
Solid Waste	0.00
Sensitive Population	—
Asthma	7.98
Cardio-vascular	16.5
Low Birth Weights	17.0
Socioeconomic Factor Indicators	—
Education	22.2
Housing	37.5
Linguistic	62.7
Poverty	23.7
Unemployment	49.9

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	69.01065058
Employed	74.81072758
Median HI	76.9665084
Education	—
Bachelor's or higher	94.43089953
High school enrollment	100
Preschool enrollment	89.76004106
Transportation	—
Auto Access	95.6242782
Active commuting	62.06852303
Social	—
2-parent households	37.05889901
Voting	51.55909149
Neighborhood	—
Alcohol availability	29.56499423
Park access	16.01437187
Retail density	95.8039266
Supermarket access	59.78442192
Tree canopy	52.39317336
Housing	—
Homeownership	34.89028615
Housing habitability	62.20967535
Low-inc homeowner severe housing cost burden	78.3908636
Low-inc renter severe housing cost burden	75.63197742

Uncrowded housing	50.73784165
Health Outcomes	—
Insured adults	74.51559091
Arthritis	60.6
Asthma ER Admissions	94.1
High Blood Pressure	58.0
Cancer (excluding skin)	16.1
Asthma	83.3
Coronary Heart Disease	66.7
Chronic Obstructive Pulmonary Disease	84.0
Diagnosed Diabetes	91.2
Life Expectancy at Birth	99.0
Cognitively Disabled	29.3
Physically Disabled	57.4
Heart Attack ER Admissions	67.3
Mental Health Not Good	90.9
Chronic Kidney Disease	79.8
Obesity	86.9
Pedestrian Injuries	65.6
Physical Health Not Good	90.6
Stroke	80.6
Health Risk Behaviors	—
Binge Drinking	26.9
Current Smoker	91.5
No Leisure Time for Physical Activity	96.9
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0

Children	69.7
Elderly	28.2
English Speaking	45.5
Foreign-born	62.1
Outdoor Workers	95.9
Climate Change Adaptive Capacity	—
Impervious Surface Cover	24.7
Traffic Density	71.7
Traffic Access	87.4
Other Indices	—
Hardship	17.8
Other Decision Support	—
2016 Voting	47.2

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	27.0
Healthy Places Index Score for Project Location (b)	80.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Land Use	—
Construction: Construction Phases	—
Construction: Off-Road Equipment	—
Operations: Hearths	—



DOUGLASKIM+ASSOCIATES,LLC

MATES V TOXIC EMISSIONS OVERVIEW

About Air Toxics Cancer Risk

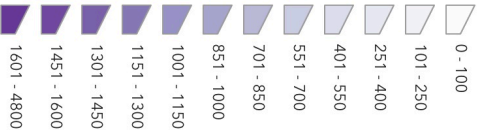
Information about community profile statistics
Information about emission sources
Download PDF

Residential Air Toxics Cancer Risk at
MATES Monitoring Sites



Residential Air Toxics Cancer Risk
Calculated from Model Data

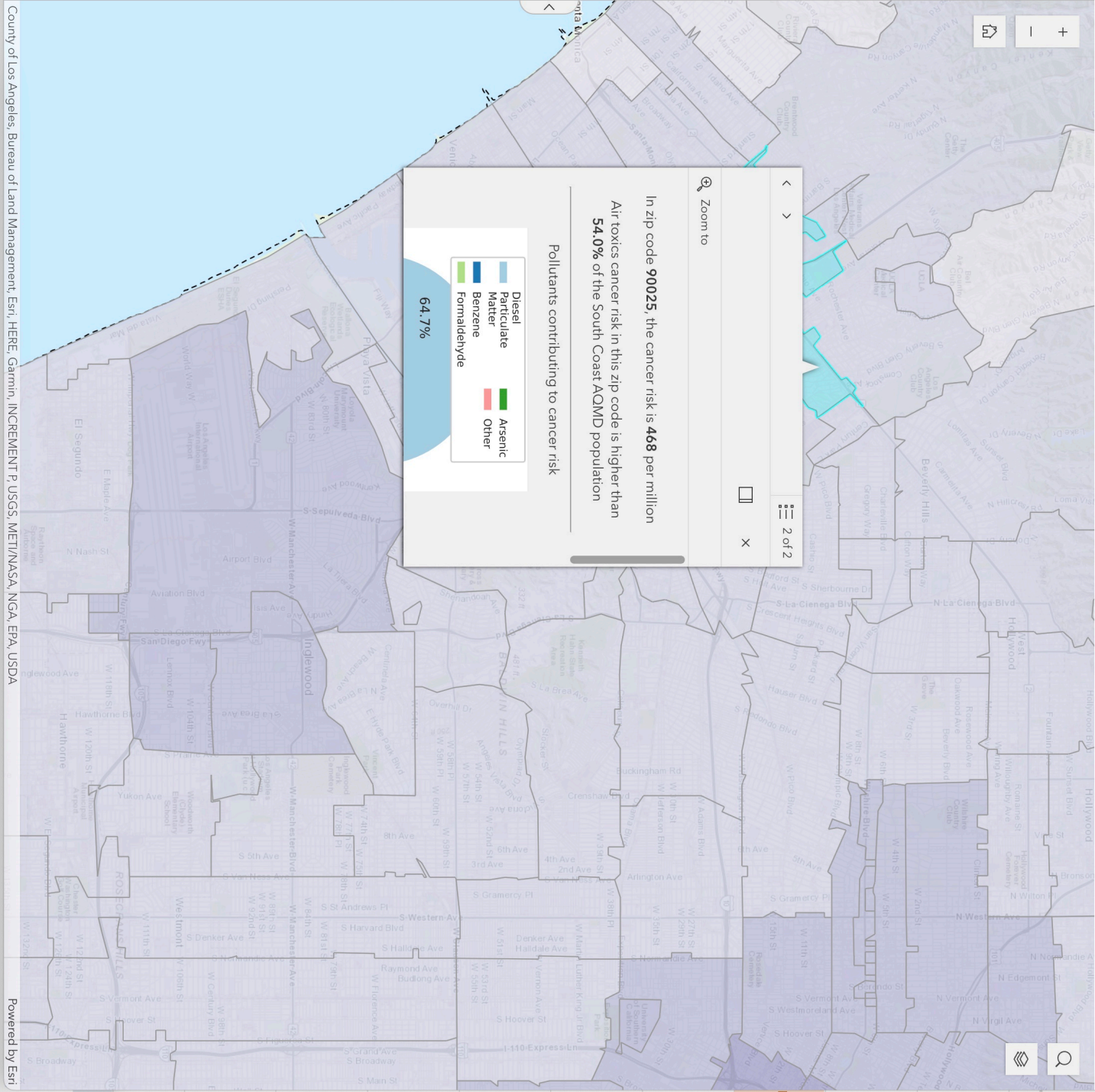
Cancer Risk [per million]



South Coast AQMD Boundary



The air toxics cancer risk data presented in the
MATES Data Visualization is calculated using a
population-weighted average.

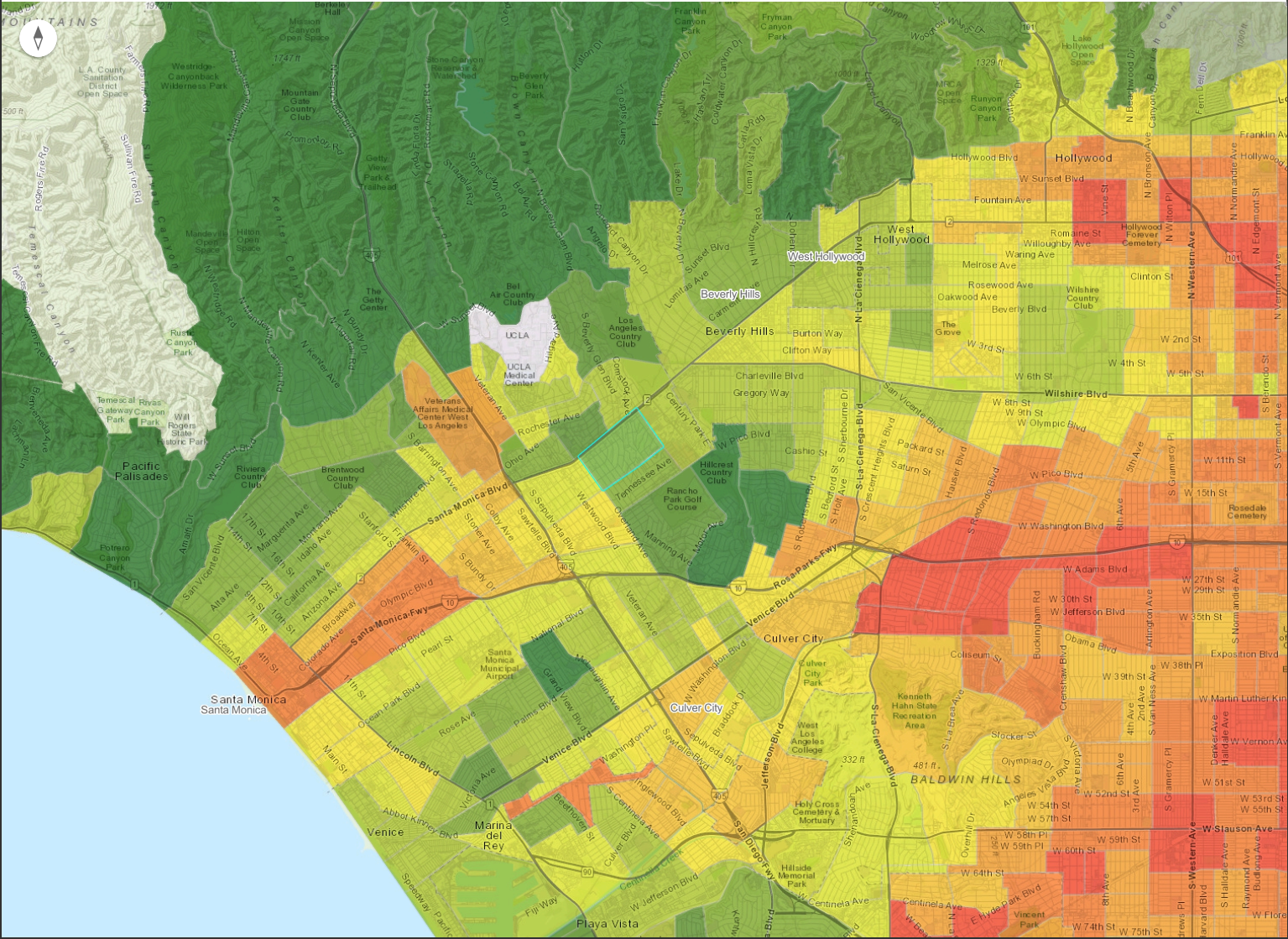




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CALENVIROSCREEN 4.0 OUTPUT

CalEnviroScreen 4.0 - October 2021



CalEnviroScreen 4.0 High Pollution, Low Population



Census Tract: 6037267100 (Population: 6,649)

The results for each indicator range from 0-100 and represent the percentile ranking of census tract 6037267100 relative to other census tracts.

Overall Percentiles

CalEnviroScreen 4.0 Percentile	27
Pollution Burden Percentile	60
Population Characteristics Percentile	15

Exposures

Ozone	54
Particulate Matter 2.5	70
Diesel Particulate Matter	87
Toxic Releases	75
Traffic	79
Pesticides	0
Drinking Water	53
Lead from Housing	51

Environmental Effects

Cleanup Sites	8
Groundwater Threats	44
Hazardous Waste	55
Impaired Waters	0
Solid Waste	0

Sensitive Populations

Asthma	8
Low Birth Weight	17
Cardiovascular Disease	16

Socioeconomic Factors

Education	22
Linguistic Isolation	63
Poverty	24
Unemployment	50
Housing Burden	37





DOUGLASKIM+ASSOCIATES,LLC

DEMOLITION ANALYSIS



DOUGLASKIM+ASSOCIATES,LLC

CUMULATIVE PROJECTS

RELATED PROJECTS

Centroid Info:

PROJ ID: 59141

Address: 10535 MISSOURI AV, CA

Lat/Long: 34.0535, -118.427

Buffer Radius: 1500 feet

Search

Column

Include NULL "Trip info":

☐

Include NULL "FirstStudySubmittalDate" (latest)

☐

Include "Inactive" projects:

☐

Include "Do not show in Related Project":

☐

Net_AM_Trips

- Select -

Net_PM_Trips

- Select -

Net_Daily_Trips

- Select -

Record Count: 2 | Record Per Page: All Records

Results generated since: (5/5/2025 9:02:31 AM)

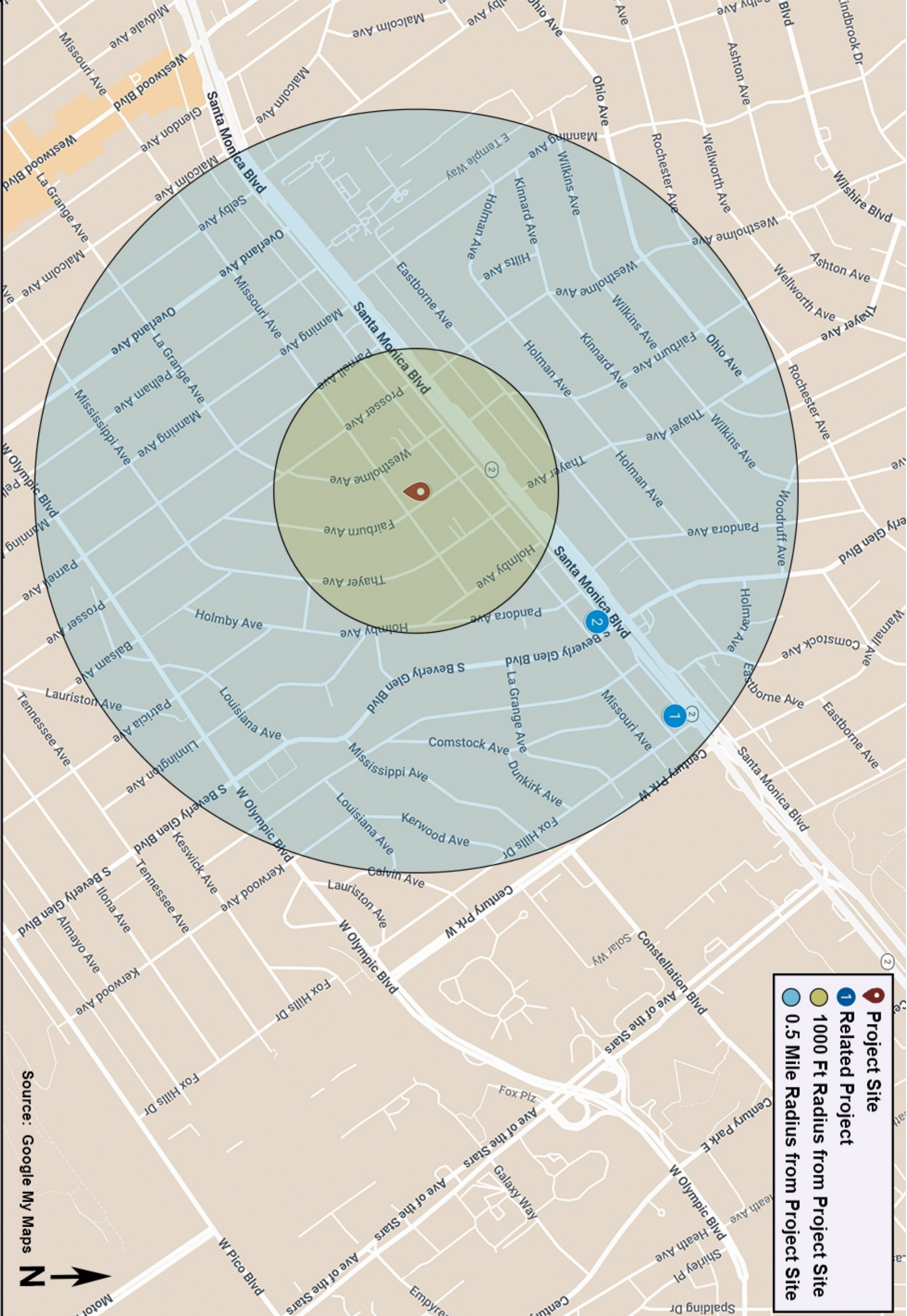
Proj ID	Office	Area	CD	Year	Project Title	Project Desc	Address	First Study Submittal Date	Inactive	Do not show in Related Project	Distance (mile)	Trip Info																																																																																	
42731	Westchester	WLA	5	2014	26 Apt to 91 Apt or 116 Apt	5 parcels total, 26 Apt to 91 Apt or 116 Apt	10306 W SANTA MONICA BLVD	10/01/2018	☐	☐	0.4	<table><tr><td>Land Use</td><td>Unit ID</td><td>size</td><td>Net_AM_Trips</td><td>Net_PM_Trips</td><td>Net_Daily_Trips</td><td>NetAMIn</td><td>NetAMOut</td><td>NetPMIn</td><td>NetPMOut</td></tr><tr><td>Apartments</td><td>Total Units</td><td>116</td><td>46</td><td>44</td><td>598</td><td>9</td><td>37</td><td>29</td><td>15</td></tr><tr><td></td><td></td><td></td><td>46</td><td>44</td><td>598</td><td></td><td>9</td><td>37</td><td>29</td></tr></table>	Land Use	Unit ID	size	Net_AM_Trips	Net_PM_Trips	Net_Daily_Trips	NetAMIn	NetAMOut	NetPMIn	NetPMOut	Apartments	Total Units	116	46	44	598	9	37	29	15				46	44	598		9	37	29	<table><tr><td>Land Use</td><td>Unit ID</td><td>size</td><td>Net_AM_Trips</td><td>Net_PM_Trips</td><td>Net_Daily_Trips</td><td>NetAMIn</td><td>NetAMOut</td><td>NetPMIn</td><td>NetPMOut</td></tr><tr><td>Apartments</td><td>Total Units</td><td>121</td><td>53</td><td>50</td><td></td><td>10</td><td>43</td><td>32</td><td>18</td></tr><tr><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>Apartments</td><td>Total Units</td><td>120</td><td>52</td><td>50</td><td>678</td><td>10</td><td>42</td><td>32</td><td>18</td></tr><tr><td></td><td></td><td></td><td>105</td><td>100</td><td>678</td><td></td><td>20</td><td>85</td><td>64</td></tr></table>	Land Use	Unit ID	size	Net_AM_Trips	Net_PM_Trips	Net_Daily_Trips	NetAMIn	NetAMOut	NetPMIn	NetPMOut	Apartments	Total Units	121	53	50		10	43	32	18											Apartments	Total Units	120	52	50	678	10	42	32	18				105	100	678		20	85	64
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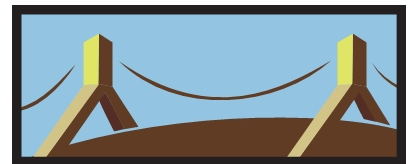


DOUGLASKIM+ASSOCIATES, LLC



10535 WEST MISSOURI AVENUE PROJECT

Noise Technical Report



Prepared by DKA Planning
May 2025

NOISE TECHNICAL REPORT

Introduction

This technical report evaluates noise impacts from construction and operation of a Proposed Project at 10535 West Missouri Avenue in the City of Los Angeles. The analysis discusses applicable regulations and compares impacts to appropriate thresholds of significance. Noise measurements, calculation worksheets, and a map of noise receptors and measurement locations are included in the Technical Appendix to this analysis.

Fundamentals of Noise

Characteristics of Sound

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

Table 1
A-Weighted Decibel Scale

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

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

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

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

Effects of Noise. The degree to which noise can impact an environment ranges from levels that interfere with speech and sleep to levels that can cause adverse health effects. Most human response to noise is subjective. Factors that influence individual responses include the intensity, frequency, and pattern of noise; the amount of background noise present; and the nature of work or human activity exposed to intruding noise. According to the National Institute of Health (NIH), extended or repeated exposure to sounds at or above 85 dB can cause hearing loss. Sounds of 70 dBA or less, even after continuous exposure, are unlikely to cause hearing loss.¹ The World Health Organization (WHO) reports that adults should not be exposed to sudden “impulse” noise events of 140 dB or greater. For children, this limit is 120 dB.²

Exposure to elevated nighttime noise levels can disrupt sleep, leading to increased levels of fatigue and decreased work or school performance. For the preservation of healthy sleeping environments, the WHO recommends that continuous interior noise levels not exceed 30 dBA and that individual noise events of 45 dBA or higher be avoided.³ Assuming a conservative exterior to interior sound reduction of 15 dBA, continuous exterior noise levels should therefore not exceed 45 dBA. Individual exterior events of 60 dBA or higher should also be limited. Some epidemiological studies have shown a weak association between long-term exposure to noise levels of 65 to 70 dBA and cardiovascular effects, including ischemic heart disease and hypertension. However, at this time, the relationship is largely inconclusive.

People with normal hearing sensitivity can recognize small changes in sound levels of approximately 3 dBA. Changes of at least 5 dBA can be readily noticeable while sound level increases of 10 dBA or greater are perceived as a doubling in loudness.⁴ However, during daytime, few people are highly annoyed by noise levels below 55 dBA L_{eq} .⁵

¹ National Institute of Health, National Institute on Deafness and Other Communication, www.nidcd.nih.gov/health/noise-induced-hearing-loss.

² World Health Organization, Guidelines for Community Noise, 1999.

³ Ibid.

⁴ Federal Transit Administration, Transit Noise and Vibration Impact Assessment, 2018.

⁵ World Health Organization, Guidelines for Community Noise, 1999.

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

Noise is most audible when traveling by direct line of sight, an unobstructed visual path between noise source and receptor. Barriers that break line of sight between sources and receivers, such as walls and buildings, can greatly reduce source noise levels by allowing noise to reach receivers by diffraction only. As a result, sound barriers can generally reduce noise levels by up to 15 dBA.⁶ The effectiveness of barriers can be greatly reduced when they are not high or long enough to completely break line of sight from sources to receivers.

Regulatory Framework

Noise

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

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

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

The State has also established noise insulation standards for new multi-family residential units, hotels, and motels that are subject to relatively high levels of noise from transportation. The noise insulation standards, collectively referred to as the California Noise Insulation Standards (Title 24, California Code of Regulations) set forth an interior standard of 45 dBA CNEL for habitable rooms.

⁶ California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013. <https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tens-sep2013-a11y.pdf>

The standards require an acoustical analysis which indicates that dwelling units meet this interior standard where such units are proposed in areas subject to exterior noise levels greater than 60 dBA CNEL. Local jurisdictions typically enforce the California Noise Insulation Standards through the building permit application process.

Los Angeles County Airport Land Use Commission Comprehensive Land Use Plan. In Los Angeles County, the Regional Planning Commission has the responsibility for acting as the Airport Land Use Commission and for coordinating the airport planning of public agencies within the County. The Airport Land Use Commission coordinates planning for the areas surrounding public use airports. The Comprehensive Land Use Plan provides for the orderly expansion of Los Angeles County's public use airports and the areas surrounding them. It is intended to provide for the adoption of land use measures that will minimize the public's exposure to excessive noise and safety hazards. In formulating the Comprehensive Land Use Plan, the Los Angeles County Airport Land Use Commission has established provisions for safety, noise insulation, and the regulation of building height within areas adjacent to each of the public airports in the County.

City of Los Angeles General Plan Noise Element. The City of Los Angeles General Plan includes a Noise Element that includes policies and standards to guide the control of noise to protect residents, workers, and visitors. Its primary goal is to regulate long-term noise impacts to preserve acceptable noise environments for all types of land uses. It includes programs applicable to construction projects that call for protection of noise sensitive uses and use of best practices to minimize short-term noise impacts.⁷ However, the Noise Element contains no quantitative or other thresholds of significance for evaluating a project's noise impacts. Instead, it adopts the State's guidance on noise and land use compatibility, shown in Table 2, "to help guide determination of appropriate land use and mitigation measures vis-à-vis existing or anticipated ambient noise levels." It also includes a policy and an objective that are relevant for the Proposed Project:

Policy 2.2: Enforce and/or implement applicable city, state, and federal regulations intended to mitigate proposed noise producing activities, reduce intrusive noise and alleviate noise that is deemed a public nuisance.

Objective 3 (Land Use Development): Reduce or eliminate noise impacts associated with proposed development of land and changes in land use.

There are also two programs that are applicable to development projects:

⁷ The City's August 2024 Construction Noise and Vibration Updates to Thresholds and Methodologies guidance relies on the Noise Elements definition of noise sensitive uses as residences, long-term care facilities, dormitories, motels, hotels, transient lodging, places of assembly (churches, house of worship), hospitals, libraries, schools, auditoriums, concert halls, outdoor theaters, nature and wildlife preserves, and parks.

Table 2
State of California Noise/Land Use Compatibility Matrix

Land Use Category	Community Noise Exposure (dB, L _{dn} or CNEL)					
	55	60	65	70	75	80
Residential - Low Density Single-Family, Duplex, Mobile Homes						
						
						
Residential - Multi-Family						
						
						
Transient Lodging - Motels Hotels						
Schools, Libraries, Churches, Hospitals, Nursing Homes						
Auditoriums, Concert Halls, Amphitheaters						
Sports Arena, Outdoor Spectator Sports						
Playgrounds, Neighborhood Parks						
Golf Courses, Riding Stables, Water Recreation, Cemeteries						
Office Buildings, Business Commercial and Professional						
Industrial, Manufacturing, Utilities, Agriculture						
 Normally Acceptable - Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.  Conditionally Acceptable - New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply system or air conditioning will normally suffice.  Normally Unacceptable - New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.  Clearly Unacceptable - New construction or development should generally not be undertaken.						
Source: California Office of Planning and Research "General Plan Guidelines, Noise Element Guidelines (Appendix D, Figure 2), 2017.						

Program 11: For a proposed development project that is deemed to have a potentially significant noise impact on noise sensitive uses, as defined by this chapter, require mitigation measures, as appropriate, in accordance with California Environmental Quality Act and city procedures.

Program 12: When issuing discretionary permits for a proposed noise-sensitive use (as defined by this chapter) or a subdivision of four or more detached single-family units and which use is determined to be potentially significantly impacted by existing or proposed noise sources, require mitigation measures, as appropriate, in accordance with procedures set forth in the California Environmental Quality Act so as to achieve an interior noise level of a CNEL of 45 dB, or less, in any habitable room, as required by Los Angeles Municipal Code Section 91.

City of Los Angeles Municipal Code. The City of Los Angeles Municipal Code (LAMC) contains regulations that would regulate noise from the Project's temporary construction activities. Section 41.40(a) would prohibit construction activities between 9:00 P.M. and 7:00 A.M., Monday through Friday. Subdivision (c) would further prohibit such activities from occurring before 8:00 A.M. or after 6:00 P.M. on any Saturday or national holiday, or at any time on any Sunday. These restrictions serve to limit specific Project construction activities to Monday through Friday 7:00 A.M. to 9:00 P.M., and 8:00 A.M. to 6:00 P.M. on Saturdays or national holidays.

SEC.41.40. NOISE DUE TO CONSTRUCTION, EXCAVATION WORK—WHEN PROHIBITED.

(a) *No person shall, between the hours of 9:00 P.M. and 7:00 A.M. of the following day, perform any construction or repair work of any kind upon, or any excavating for, any building or structure, where any of the foregoing entails the use of any power drive drill, riveting machine excavator or any other machine, tool, device or equipment which makes loud noises to the disturbance of persons occupying sleeping quarters in any dwelling, hotel or apartment or other place of residence. In addition, the operation, repair or servicing of construction equipment and the job-site delivering of construction materials in such areas shall be prohibited during the hours herein specified. Any person who knowingly and willfully violates the foregoing provision shall be deemed guilty of a misdemeanor punishable as elsewhere provided in this Code.*

(c) *No person, other than an individual homeowner engaged in the repair or construction of his single-family dwelling shall perform any construction or repair work of any kind upon, or any earth grading for, any building or structure located on land developed with residential buildings under the provisions of Chapter I of this Code, or perform such work within 500 feet of land so occupied, before 8:00 A.M. or after 6:00 P.M. on any Saturday or national holiday nor at any time on any Sunday. In addition, the operation, repair, or servicing of construction equipment and the job-site delivering of construction materials in such areas shall be prohibited on Saturdays and on Sundays during the hours herein specific...*

Section 112.04 of the LAMC bans the use of gas-powered leaf blowers within 500 feet of a residence between 10:00 P.M. and 7:00 A.M. This also includes lawn mowers, lawn edgers, riding tractors, or other equipment that makes loud sounds.

Section 112.05 of the LAMC establishes noise limits for powered equipment and hand tools operated in a residential zone or within 500 feet of any residential zone. Of particular importance to construction activities is subdivision (a), which institutes a maximum noise limit of 75 dBA as measured at a distance of 50 feet from the activity for the types of construction vehicles and equipment that would likely be used in the construction of the Project. However, the LAMC notes that these limitations would not necessarily apply if it can be proven that the Project's compliance would be technically infeasible despite the use of noise-reducing means or methods.

SEC. 112.05. MAXIMUM NOISE LEVEL OF POWERED EQUIPMENT OR POWERED HAND TOOLS

Between the hours of 7:00 A.M. and 10:00 P.M., in any residential zone of the City or within 500 feet thereof, no person shall operate or cause to be operated any powered equipment or powered hand tool that produces a maximum noise level exceeding the following noise limits at a distance of 50 feet therefrom:

- (a) 75 dBA for construction, industrial, and agricultural machinery including crawler-tractors, dozers, rotary drills and augers, loaders, power shovels, cranes, derricks, motor graders, paving machines, off-highway trucks, ditchers, trenchers, compactors, scrapers, wagons, pavement breakers, compressors and pneumatic or other powered equipment;*
- (b) 75 dBA for powered equipment of 20 HP or less intended for infrequent use in residential areas, including chain saws, log chippers and powered hand tools;*
- (c) 65 dBA for powered equipment intended for repetitive use in residential areas, including lawn mowers, backpack blowers, small lawn and garden tools and riding tractors.*

Said noise limitations shall not apply where compliance therewith is technically infeasible. The burden of proving that compliance is technically infeasible shall be upon the person or persons charged with a violation of this section. Technical infeasibility shall mean that said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers and/or other noise reduction device or techniques during the operation of the equipment.

In addition, the LAMC regulates long-term operations of land uses. This includes Section 111.02, which discusses the measurement procedure and criteria regarding the sound level of "offending" noise sources. A noise source causing a 5 dBA increase over the existing average ambient noise levels of an adjacent property is considered to create a noise violation. However, Section 111.02(b) provides a 5 dBA allowance for noise sources lasting more than five but less than 15 minutes in any 1-hour period, and a 10 dBA allowance for noise sources causing noise lasting 5 minutes or less in any 1-hour period. In accordance with these regulations, a noise level increase from certain city-regulated noise sources of five dBA over the existing or presumed ambient noise level at an adjacent property is considered a violation.

Section 112.01 of the LAMC prohibits any amplified noises, especially those from outdoor sources (e.g., outdoor speakers, stereo systems) from exceeding the ambient noise levels of adjacent properties by more than 5 dBA. Any amplified noises would also be prohibited from being audible at any distance greater than 150 feet from the Project's property line, as the Project is located within 500 feet of residential zones.

SEC.112.01. RADIOS, TELEVISION SETS, AND SIMILAR DEVICES

(a) *It shall be unlawful for any person within any zone of the City to use or operate any radio, musical instrument, phonograph, television receiver, or other machine or device for the producing, reproducing or amplification of the human voice, music, or any other sound, in such a manner, as to disturb the peace, quiet, and comfort of neighbor occupants or any reasonable person residing or working in the area.*

(b) *Any noise level caused by such use or operation which is audible to the human ear at a distance in excess of 150 feet from the property line of the noise source, within any residential zone of the City or within 500 feet thereof, shall be a violation of the provisions of this section.*

(c) *Any noise level caused by such use or operation which exceeds the ambient noise level on the premises of any other occupied property, or if a condominium, apartment house, duplex, or attached business, within any adjoining unit, by more than five (5) decibels shall be a violation of the provisions of this section.*

Section 112.02 prevents Project heating, ventilation, and air conditioning (HVAC) systems and other mechanical equipment from elevating ambient noise levels by more than 5 dBA.

SEC.112.02. AIR CONDITIONING, REFRIGERATION, HEATING, PLUMBING, FILTERING EQUIPMENT

(a) *It shall be unlawful for any person, within any zone of the city, to operate any air conditioning, refrigeration or heating equipment for any residence or other structure or to operate any pumping, filtering or heating equipment for any pool or reservoir in such manner as to create any noise which would cause the noise level on the premises of any other occupied property ... to exceed the ambient noise level by more than five decibels.*

The LAMC also regulates vehicle-related noise. Section 114.02 prohibits the operation of any motor driven vehicles upon any property within the City in a manner that would cause the noise level on the premises of any occupied residential property to elevate ambient noise levels by more than 5 dBA. Section 114.03 prohibits loading and unloading causing any impulsive sound, raucous or unnecessary noise within 200 feet of any residential building between the hours of 10:00 P.M. and 7:00 A.M. Section 114.06 requires vehicle theft alarm systems to be silenced within five minutes.

City of Los Angeles 2024 Construction Noise and Vibration Updates to Thresholds and Methodologies. The City's August 2024 Construction Noise and Vibration Updates to Thresholds

and Methodologies guidance call on projects to incorporate noise-related Environmental Protection Measures (EPMs) from the Environmental Impact Reports associated with adopted Community Plan updates. The Proposed Project is located in the West Los Angeles Community Plan area, where an update was adopted in 1997 that did not include EPMs from the CEQA clearance documentation. Nevertheless, the City requires EPMs be implemented as part of development projects as standard conditions of approval. These are summarized in Table 3, along with the applicability of each EPM.

Table 3
Applicability of City of Los Angeles Environmental Protection Measures

EPM	Applicability Threshold	Standard	Applicability to Project
NV1-1: Noise Shielding and Muffling	Any Project whose earthwork or construction activities involve the use of construction equipment and require a permit from the Los Angeles Department of Building and Safety (LADBS).	Power construction equipment (including combustion engines), fixed or mobile, shall be equipped with noise shielding and muffling devices consistent with manufacturers' standards or the Best Available Control Technology. All equipment shall be properly maintained, and the Applicant or Owner shall require any construction contractor to keep documentation on-site during any earthwork or construction activities demonstrating that the equipment has been maintained in accordance with manufacturer's specifications.	Applicable. The Project would use quieter equipment or advanced mufflers, in accordance with EPM NV1-1 (Noise Shielding and Muffling).
NV1-2: Use of Driven Pile Systems	Any Project whose earthwork and construction activities involve the use of construction equipment and require a permit from LADBS.	Driven (impact) pile systems shall not be used, except in locations where the underlying geology renders drilled piles, sonic, or vibratory pile drivers infeasible, as determined by a soils or geotechnical engineer and documented in a soils report.	Not Applicable. The Project would not include driven (impact) pile systems; therefore, EPM NV1-2 (Use of Driven Pile Systems) is not applicable.
NV1-3: Enclosure or Screening of Outdoor Mechanical Equipment	Any Project whose earthwork or construction activities involve the use of construction equipment and require a permit from LADBS.	All outdoor mechanical equipment (e.g., generators, compressors) shall be enclosed or visually screened. The equipment enclosure or screen shall be impermeable (i.e., solid material with minimum weight of 2 pounds per square feet) and break the line of sight between the equipment and any offsite Noise-Sensitive Uses.	Applicable. The Project would enclose or screen all outdoor mechanical equipment and break the line of sight between the equipment and any off-site noise-sensitive uses, in accordance with EPM NV1-3 (Enclosure or Screening of Outdoor Mechanical Equipment).
NV1-4: Location of Construction Staging Areas	Any Project whose earthwork or construction activities involve the use of construction equipment and require a permit from LADBS.	Construction staging areas shall be located as far from Noise-Sensitive Uses as reasonably possible and technically feasible in consideration of site boundaries, topography, intervening roads and uses, and operational constraints. The burden of proving what constitutes 'as far as possible' shall be upon the Applicant or Owner, in consideration of the above factors.	Applicable. The Project would locate its construction staging areas as far from noise-sensitive uses as reasonably and technically feasible, in accordance with EPM NV1-4 (Location of

			Construction Staging Areas).
NV1-5: Temporary Walls	Any Project whose earthwork and construction activities involve the use of construction equipment and require a permit from LADBS; and whose construction activities are located within a line of sight to and within 500 feet of Noise-Sensitive Uses, with the exception of Projects limited to the construction of 2,000 square feet or less of floor area dedicated to residential uses.	Noise barriers, such as temporary walls (minimum ½-inch thick plywood) or sound blankets (minimum STC 25 rating), that are a minimum of eight feet tall, shall be erected between construction activities and Noise-Sensitive Uses as reasonably possible and technically feasible in consideration of site boundaries, topography, intervening roads and uses, and operational constraints. The burden of proving that compliance is technically infeasible shall be upon the Applicant or Owner. Technical infeasibility shall mean that noise barriers cannot be located between construction activities and Noise-Sensitive Uses due to site boundaries, topography, intervening roads and uses, and/or operational constraints.	Applicable. The Project assumes the use of best practices techniques required by the City's Building and Safety code to meet these requirements, such as temporary sound barriers along the property lines adjacent to neighboring residences that would generally reduce noise impacts at sensitive receptors by about 10 dBA L_{eq} in accordance with EPM NV1-5 (Temporary Walls).
NV1-6: Noise Study	Any Project whose earthwork or construction activities involve the use of construction equipment and require a permit from LADBS; are located within 500 feet of Noise-Sensitive Uses; and have one or more of the following characteristics: · Two or more subterranean levels; · 20,000 cubic yards or more of excavated material · Simultaneous use of five or more pieces of construction equipment; or · Construction duration (excluding architectural coatings) of 18 months or more. Or any Project whose construction activities involve impact pile driving or the use of 300 horsepower equipment.	A Noise Study prepared by a Qualified Noise Expert shall be required and prepared prior to obtaining any permit by LADBS. The Noise Study shall characterize expected sources of earthwork and construction noise that may affect identified Noise-Sensitive Uses, quantify expected noise levels at these Noise-Sensitive Uses, and recommend measures to reduce noise exposure to the extent noise reduction measures are available and feasible, and to demonstrate compliance with any noise requirements in the LAMC. Specifically, the Noise Study shall identify noise reduction devices or techniques to reduce noise levels in accordance with accepted industry practices and in compliance with LAMC standards. Noise reduction devices or techniques shall include but not be limited to mufflers, shields, sound barriers, and time and place restrictions on equipment and activities. The Noise Study shall identify anticipated noise reductions at Noise-Sensitive Uses associated with the noise reduction measures. Applicants and Owners shall be required to implement and comply with all measures identified and recommended in the Noise Study. The Noise Study and copies of any contractor agreements shall be maintained pursuant to the proof of compliance requirements in Section I.D.6.	Applicable. The Project has conducted a noise study in accordance with EPM NV1-6 (Noise Study) since it would have the following characteristics that exceed the applicability threshold: possible simultaneous use of five or more pieces of construction equipment, and a building construction duration of 29 months (threshold is 18 months). The Project includes 6,500 cubic yards of export, which is below the threshold of 20,000 cubic yards.

Existing Conditions

Noise Sensitive Receptors

The Project Site is located in a residential area in West Los Angeles. Noise-sensitive receptors within 0.25 miles of the Project Site include, but are not limited to, the following representative sampling:

- Residences, 1833 Fairburn Avenue; five feet north of the Project Site.
- Residences, 1838 Westholme Avenue; 15 feet west of the Project Site.
- Residences, 1901 Fairburn Avenue; 60 feet south of the Project Site.
- Residences, 1840 Fairburn Avenue; 75 feet east of the Project Site.

Existing Ambient Noise Levels

The Project Site is improved with two multi-family residences that total 2,495 square feet and two detached garages accessed from Missouri Avenue and Fairburn Avenue. These residential uses are typical of quiet residences, with intermittent noise from tire friction as vehicles navigate to and from parking spaces, minor engine acceleration, doors slamming, and occasional car alarms. Most of these sources are instantaneous (e.g., car alarm chirp, door slam) while others may last a few seconds. There is also infrequent noise from occasional solid waste management and collection activities as well as landscaping activities that are of short duration.

Traffic is the primary source of noise near the Project Site, largely from the operation of vehicles with internal combustion engines and frictional contact with the ground and air.⁸ This includes traffic on Santa Monica Boulevard, which carries about 4,211 vehicles at Overland Avenue in the A.M. peak hour.⁹ Existing development contributes about 15 daily vehicle trips to and from the Project Site along local roads.¹⁰

In May 2025, DKA Planning took short-term noise measurements near the Project site to determine the ambient noise conditions of the neighborhood near sensitive receptors.¹¹ As shown in Table 4, noise levels along roadways near the Project Site ranged from 55.6 to 60.3 dBA L_{eq} , which was generally consistent with the low traffic volumes on local streets that flank the Project Site. Figure 1 illustrates where ambient noise levels were measured near the Project Site to establish the noise environment and their relationship to the applicable sensitive receptor(s). 24-

⁸ World Health Organization, <https://www.who.int/docstore/peh/noise/Comnoise-2.pdf> accessed March 18, 2021.

⁹ DKA Planning, 2025, based on City of Los Angeles database of traffic volumes on Santa Monica Boulevard at Overland Avenue, https://navigatela.lacity.org/dot/traffic_data/manual_counts/17016_OVESAN170214.pdf, 2017 traffic counts adjusted by one percent growth factor to represent existing conditions.

¹⁰ City of Los Angeles, VMT Calculator, 1.3; August 2022.

¹¹ Noise measurements were taken using a Quest Technologies Sound Examiner SE-400 Meter. The Sound Examiner meter complies with the American National Standards Institute (ANSI) and International Electrotechnical Commission (IEC) for general environmental measurement instrumentation. The meter was equipped with an omni-directional microphone, calibrated before the day's measurements, and set at approximately five feet above the ground.

hour CNEL noise levels are generally considered “Normally Acceptable” for the types of land uses near the Project Site.



Table 4
Existing Noise Levels

Noise Measurement Locations	Primary Noise Source	Sound Levels		Nearest Sensitive Receptor(s)	Noise/Land Use Compatibility ^b
		dBA (Leq)	dBA (CNEL) ^a		
A. 1901 Fairburn Ave.	Traffic on Missouri Ave.	55.6	53.6	Residences, 1901 Fairburn Ave and 1838 Westholme Ave.	Normally Acceptable
B. 1833 Fairburn Ave.	Traffic on Fairburn Ave.	60.3	58.3	Residences, 1833 and 1840 Fairburn Ave.	Normally Acceptable

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

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

Source: DKA Planning, 2025

Project Impacts

Methodology

On-Site Construction Activities. Construction noise levels at off-site sensitive receptors were modeled employing the ISO 9613-2 sound attenuation methodologies using the SoundPLAN Essential model (version 5.1). This software package considers reference equipment noise levels, maximum allowable noise levels allowed by the LAMC, noise management techniques, distance to receptors, and any attenuating features to predict noise levels from sources like construction equipment. Construction noise sources were modeled as area sources to reflect the mobile nature of construction equipment. These vehicles would not operate directly where the Project's property line abuts adjacent structures, as they would retain some setback to preserve maneuverability. This equipment would also occasionally operate at reduced power and intensity to maintain precision at these locations.

Off-Site Construction Noise Activities. The Project's off-site construction noise impact from haul trucks, vendor deliveries, worker commutes, and other vehicles accessing the Project Site was analyzed by considering the Project's anticipated vehicle trip generation with existing traffic and roadway noise levels along local roadways, particularly those likely to be part of any haul route. Because it takes a doubling of traffic volumes on a roadway to generate the increased sound energy it takes to elevate ambient noise levels by 3 dBA,¹² the analysis focused on whether truck and auto traffic would double traffic volumes on key roadways to be used for hauling soils to and/or from the Project Site during construction activities.¹³ Because haul trucks generate more noise than traditional passenger vehicles, a 19.1 passenger car equivalency (PCE) was used to convert haul truck trips to a reference level conversion to an equivalent number of passenger vehicles.¹⁴ For vendor deliveries, a 13.1 PCE was used to reflect an even blend of medium- and heavy-duty vehicles.¹⁵ It should be noted that because an approved haul route may not be approved as of the preparation of this analysis, assumptions were made about logical routes that would minimize haul truck traffic on local streets in favor of major arterials that can access regional-serving freeways.

On-Site Operational Noise Activities. The Project's potential to result in significant noise impacts from on-site operational noise sources was evaluated by identifying sources of on-site noise and considering the impact that they could produce given the nature of the source (i.e., loudness and whether noise would be produced during daytime or more-sensitive nighttime hours), distances

¹² Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018.

¹³ A tripling of traffic volumes (i.e., 3.15x) is needed to elevate traffic noise levels by 5 dBA.

¹⁴ Caltrans, Technical Noise Supplement Table 3-3, 2013. Assumes 35 mph speed. While trucks traveling at higher speeds would have lower equivalency values (e.g., PCE is 15.1 at 40 mph), this analysis assumes a posted speed limit typical of major arterials (35 mph). While these equivalent vehicle factors do not consider source heights, Caltrans' factors are appropriate for use, as the local roads used by haul trucks would not involve a sound path where noise levels are intercepted by a barrier or natural terrain feature.

¹⁵ Caltrans, Technical Noise Supplement Table 3-3, 2013. Medium-duty trucks have a 7.1 PCE at 35 mph.

to nearby sensitive receptors, ambient noise levels near the Project Site, the presence of similar noise sources in the vicinity, and maximum noise levels permitted by the LAMC.

Off-Site Operational Noise Activities. The Project's off-site noise impact from Project-related traffic was evaluated based its potential to increase traffic volumes on local roadways that serve the Project site. Because it takes a doubling of traffic volumes on a roadway to generate the increased sound energy it takes to elevate ambient noise levels by 3 dBA, the analysis focused on whether auto trips generated by the Proposed Project would double traffic volumes on key roadways that access the Project Site.

Thresholds of Significance

Construction Noise Thresholds. Based on guidelines from the City of Los Angeles City Department of Planning, the on-site construction noise impact would be considered significant if:¹⁶

- On- and off-site construction noise during daytime hours (7:00 A.M. and 7:00 P.M. Monday through Friday and 8:00 A.M to 6:00 P.M. on Saturdays) exceed 80 dBA $L_{eq(8-hour)}$ at sensitive uses (at the property line or at the exterior of the building), including outdoor public recreational areas owned or maintained by a public agency. This standard does not apply to private residential balconies which may or may not extend past the exterior of a building, or to private residential recreational areas.
- For construction activities that occur between 7:00 P.M. and 7:00 A.M. Monday through Friday and between 6:00 P.M. and 8:00 A.M. on Saturdays and anytime on Sundays or national holidays, noise levels at sensitive uses would not exceed 5 dBA above the ambient noise level at the receptor.¹⁷

Operational Noise Thresholds. In addition to applicable City standards and guidelines that would regulate or otherwise moderate the Project's operational noise impacts, the following criteria are adopted to assess the impact of the Project's operational noise sources:

- Project operations would cause ambient noise levels at off-site locations to increase by 3 dBA CNEL or more to or within "normally unacceptable" or "clearly unacceptable" noise/land use compatibility categories, as defined by the State's 2017 General Plan Guidelines.
- Project operations would cause any 5 dBA CNEL or greater noise increase.¹⁸

¹⁶ City of Los Angeles. Construction Noise and Vibration Updates to Thresholds and Methodologies; August 2024.

¹⁷ Pursuant to the City's August 2024 Construction Noise and Vibration Updates to Thresholds and Methodologies guidance, mat pour activities (and other types of concrete pour that require an extended continuous pour beyond allowable construction hours) that are required to occur during nighttime hours for less than five days are exempt from this provision.

¹⁸ As a 3 dBA increase represents a slightly noticeable change in noise level, this threshold considers any increase in ambient noise levels to or within a land use's "normally unacceptable" or "clearly unacceptable" noise/land use compatibility categories to be significant so long as the noise level

Analysis of Project Impacts

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

Less Than Significant Impact.

Construction

On-Site Construction Activities

Construction would generate noise during the construction process that would span 29 months of demolition, site preparation, grading, utilities trenching, building construction, and application of architectural coatings, as shown in Table 5. During all construction phases, noise-generating activities could occur at the Project Site between 7:00 A.M. and 7:00 P.M. Monday through Friday. On Saturdays, construction would be permitted to occur between 8:00 A.M. and 6:00 P.M.

Table 5
Construction Schedule Assumptions

Phase	Duration	Notes
Demolition	Months 1-2	Removal of 400 tons of debris hauled 41 miles to landfill in 14-cubic yard capacity trucks.
Site Preparation	Month 3	Grubbing and removal of trees, plants, landscaping, weeds
Grading	Month 4	Approximately 6,500 cubic yards of soil (including 25 percent swell factor) ¹⁹ hauled 41 miles to landfill in 14-cubic yard capacity trucks.
Trenching	Month 4	Trenching for utilities, including gas, water, electricity, and telecommunications.
Building Construction	Months 5-29	Footings and foundation work, framing, welding; installing mechanical, electrical, and plumbing. Floor assembly, cabinetry and carpentry, elevator installations, low voltage systems, trash management.
Architectural Coatings	Months 22-26	Application of interior and exterior coatings and sealants.
Source: DKA Planning, 2025.		

increase can be considered barely perceptible. In instances where the noise level increase would not necessarily result in “normally unacceptable” or “clearly unacceptable” noise/land use compatibility, a 5 dBA increase is still considered to be significant. Increases less than 3 dBA are unlikely to result in noticeably louder ambient noise conditions and would therefore be considered less than significant.

¹⁹ City of Los Angeles, Environmental Assessment Form

Noise levels would generally peak during the demolition and grading phases, when diesel-fueled heavy-duty equipment like excavators and dozers are used to move large amounts of debris and dirt, respectively. This equipment is mobile in nature and does not always operate at in a steady-state mode full load, but rather powers up and down depending on the duty cycle needed to conduct work. As such, equipment is occasionally idle during which time no noise is generated.

During other phases of construction (e.g., site preparation, trenching, building construction, architectural coatings), noise impacts are generally lesser because they are less reliant on using heavy equipment with internal combustion engines. Smaller equipment such as forklifts, generators, and various powered hand tools and pneumatic equipment would often be utilized. Off-site secondary noises would be generated by construction worker vehicles, vendor deliveries, and haul trucks. Figure 2 illustrates how noise would propagate from the construction site during the demolition and grading phase.

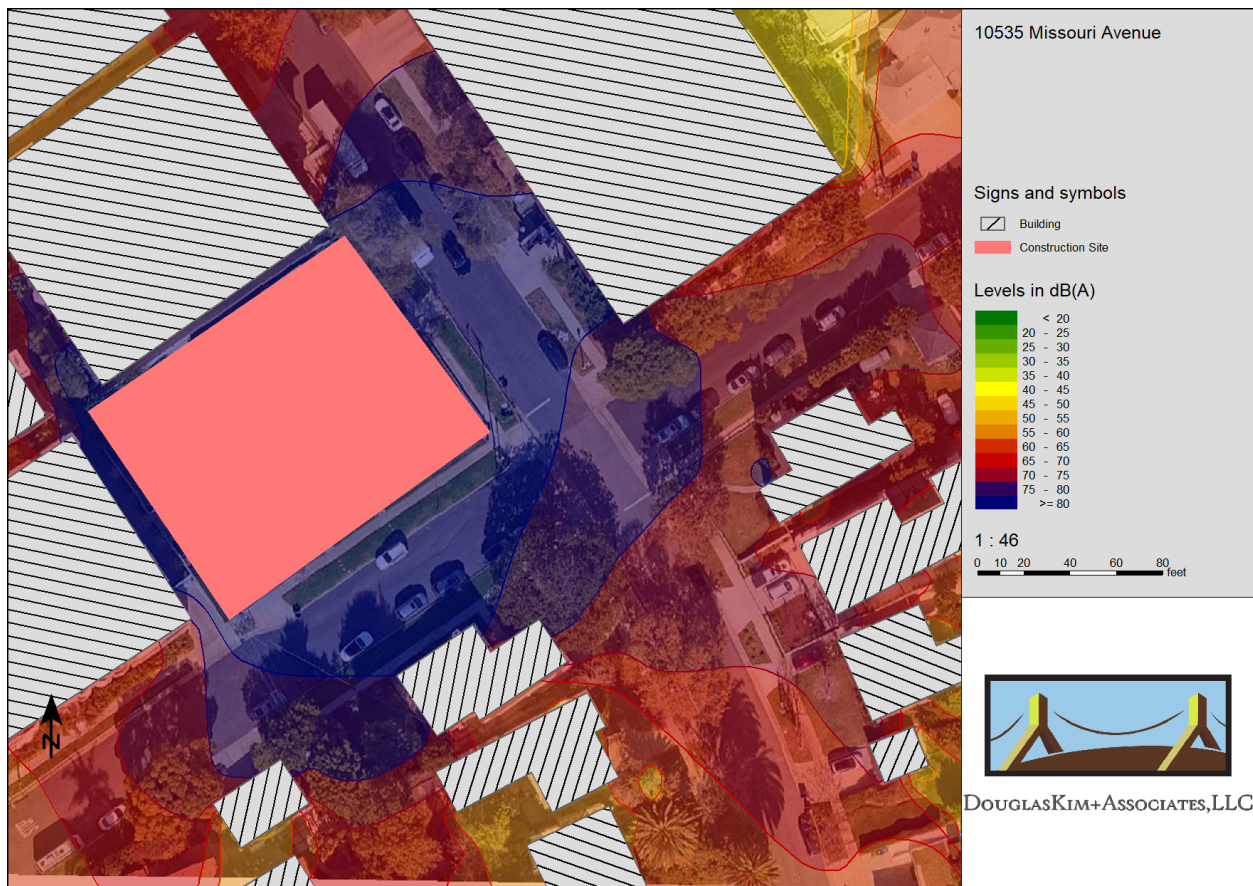


Figure 2
Construction Noise Contours

Because the Project's construction activity would occur between 7:00 A.M. and 7:00 P.M. Monday through Friday, noise from these activities would not be considered significant under the City's guidance, as there is no numerical threshold above ambient levels for construction during these hours. As illustrated in Table 6, on-site construction noise during daytime hours (7:00 A.M. and

7:00 P.M. Monday through Friday and 8:00 A.M to 6:00 P.M. on Saturdays) would not exceed 80 dBA $L_{eq(8-hour)}$ at analyzed sensitive uses near the Project Site.²⁰

Table 6
Construction Noise Impacts at Off-Site Sensitive Receptors

Receptor	Maximum Construction Noise Level (dBA $L_{eq(8-hour)}$)	Potentially Significant?
1. Residences – 1833 Fairburn Ave.	72.8	No
2. Residences – 1840 Fairburn Ave.	77.8	No
3. Residences – 1838 Westholme Ave.	68.1	No
4. Residences – 1901 Fairburn Ave.	78.6	No
Source: DKA Planning, 2025. Using SoundPLAN Essential, estimated at exterior of the building of the sensitive receptor or at the property line of outdoor public recreational areas owned or maintained by a public agency, as applicable. Does not include private residential balconies which may or may not extend past the exterior of a building, or to private residential recreational areas.		

Off-Site Construction Activities

The Project would also generate noise at off-site locations from haul trucks moving debris and soil from the Project Site during demolition and grading activities, respectively; vendor trips; and worker commute trips. These activities would generate an estimated 119 peak hourly PCE trips, as summarized in Table 7, during the grading phase.²¹ This would represent about 2.8 percent of traffic volumes on Santa Monica Boulevard, which carries about 4,211 vehicles at Overland Avenue in the morning peak hour of traffic.²² Because workers and vendors will likely use more than one route to travel to and from the Project Site, this conservative assessment of traffic volumes likely overstates traffic volumes from construction activities on this roadway link.

Santa Monica Boulevard would serve as part of the haul route for soil, soil exported from the Project Site given its direct access to the San Diego Freeway. Because the Project's construction-related trips would not cause a doubling in traffic volumes (i.e., 100 percent increase) on Santa Monica Boulevard, the Project's construction-related traffic would not increase existing noise levels by 3 dBA or more, and would not exceed 80 dBA $L_{eq(8-hour)}$ at analyzed sensitive uses near

²⁰ Pursuant to the City's August 2024 Construction Noise and Vibration Updates to Thresholds and Methodologies guidance, noise exposure is estimated at exterior of the building of the sensitive receptor or at the property line of outdoor public recreational areas owned or maintained by a public agency. This does not apply to private residential balconies which may or may not extend past the exterior of a building, or to private residential recreational areas.

²¹ This is a conservative, worst-case scenario, as it assumes all workers travel to the worksite at the same time and that vendor and haul trips are made in the same early hour, using the same route as haul trucks to travel to and from the Project Site.

²² DKA Planning, 2025, based on City of Los Angeles database of traffic volumes on Santa Monica Boulevard at Overland Avenue, https://navigatela.lacity.org/dot/traffic_data/manual_counts/17016_OVESAN170214.pdf, 2017 traffic counts adjusted by one percent growth factor to represent existing conditions.

the Project Site. Therefore, the Project's noise impacts from construction-related traffic would be less than significant.

Table 7
Construction Vehicle Trips (Maximum Hourly)

Construction Phase	Worker Trips ^a	Vendor Trips	Haul Trips	Total Trips	Percent of Peak A.M. Hour Trips on Santa Monica Bl. ^f
Demolition	5	0	6 ^b	11	0.3
Site Preparation	3	0	1 ^c	4	0.1
Grading	4	0	115 ^d	119	2.8
Trenching	1	0	0	1	0.1
Building Construction	20	32 ^e	0	51	1.2
Architectural Coating	4	0	0	4	0.1
^a Assumes all worker trips occur in the peak hour of construction activity. ^b The project would generate 100 haul trips over a 42-day period with seven-hour work days. Because haul trucks emit more noise than passenger vehicles, a 19.1 passenger car equivalency (PCE) was used to convert haul truck trips to a passenger car equivalent ^c The project would generate 10 haul trips over a 22-day period with seven-hour work days. Assumes a 19.1 PCE. ^d The project would generate 929 haul trips over a 22-day period with seven-hour work days. Assumes a 19.1 PCE. ^e This phase would generate about 8.5 vendor truck trips daily over a seven-hour work day. Assumes a blend of medium- and heavy-duty vehicle types and a 13.1 PCE. ^f Percent of existing traffic volumes on Santa Monica Boulevard at Overland Avenue.					
Source: DKA Planning, 2025					

Operation

On-Site Operational Noise

During long-term operations, the Project would produce noise from on-site sources such as mechanical equipment associated with the structures themselves or from activity in outdoor spaces.

Mechanical Equipment

The Project would operate mechanical equipment on the roof 73'6" above grade that would generate incremental long-term noise impacts. This analysis assumes the use of typical HVAC equipment for cooling or heat pumps for cooling and heating for multi-family residences (e.g., 2.5-ton Carrier 24ABC630A003 Carrier 25HBC5), with each unit distributed across the roof as needed to serve each residence. Noise from heat pumps and air conditioners is a function of the model, airflow, and pressure flow generated by fans and compressors. Most modern heat pumps are relatively quiet, with sound ratings of up to 60 decibels, equivalent to normal human

conversation,²³ while other HVAC units could have a sound power of up to 76 dBA. Equipment would be designed to not elevate ambient noise levels by 5 dBA in accordance with City regulations.

However, noise impacts from rooftop mechanical equipment on nearby sensitive receptors would be negligible for several reasons. First, there would be no line-of-sight from these rooftop units to the sensitive receptors, as the residences adjacent to the Project Site are three- to four-stories in height, approximately 25 to 35 feet lower than the roof of the Proposed Project. As blocking the line of sight to a noise source generally results in a 5 decibel reduction, each rooftop unit could generate about 50.3 dBA at ten feet of distance.²⁴ Second, the presence of the Project's roof edge creates an effective noise barrier that further reduces noise levels from rooftop units by 8 dBA or more.²⁵ A parapet would further shield sensitive receptors near the Project Site. These design elements would be helpful in managing noise, as equipment often operates continuously throughout the day and occasionally during the day, evenings, and weekends. Compliance with LAMC Section 112.02 would further limit the impact of HVAC equipment on noise levels at adjacent properties. As a result, noise from rooftop units would negligibly elevate ambient noise levels, far less than the 5 dBA CNEL threshold of significance for operational impacts.

A pad-mounted oil transformer that lowers high voltage to standard household voltage used to power electronics, appliances and lighting would be located on the ground level in an unobstructed location on Fairburn Avenue. This transformer would be housed in a steel cabinet and generally would not involve pumps, though fans may be needed on some units. Switchgear responsible for distributing power through the development could be located externally, though no mechanical processes that generate noise would be necessary. Booster (supply and exhaust) fans that ventilate the subterranean garage could be located on the above-ground garage levels of the partially-open garage.²⁶

Otherwise, all other mechanical equipment would be fully enclosed within the structure. This would include elevator equipment (including hydraulic pump, switches, and controllers) in the P1 level subterranean basement. All these activities would generally occur within the envelope of the development, operational noise would be shielded from off-site noise-sensitive receptors.

Parking-Related Activities

The majority of parking-related noise impacts at the Project Site would come from vehicles entering and exiting the residential development from a driveway off Missouri Avenue. During the peak P.M. hour, up to 13 vehicles would generate noise in and out of the garage, with up to 11

²³ Clean British Columbia. Heat Pumps and Noise. <https://vancouver.ca/files/cov/heat-pump-noise-guide.pdf>

²⁴ Washington State Department of Transportation, Noise Walls and Barriers. <https://wsdot.wa.gov/construction-planning/protecting-environment/noise-walls-barriers>. Assumes the Carrier's rated sound power of 76 dB.

²⁵ Ibid.

²⁶ The International Mechanical Code (Section 404.1) and the American Society of Heating Refrigeration, and Air Conditioning (ASHRAE) Standard 62 require mechanical ventilation systems for enclosed parking garages that cycle clean air into the garage and ventilate harmful air pollutants.

net vehicles using the garage in the peak A.M. hour.²⁷ These vehicles would generate incremental noise from tire friction as they navigate to and from parking spaces and minor engine acceleration.

Nearby residences across Missouri Avenue would have a direct line of sight to the driveway, approximately 35 feet away. As shown in Table 8, the average vehicle use of the garage during daytime hours (average of 7.9 vehicles per hour between 8:00 A.M. and 7:00 P.M.) and nighttime hours (an average of 3.2 vehicles hourly from 7:00 P.M. to 8:00 A.M.) would elevate ambient noise levels by 0.3 dBA CNEL, well below the 5 dBA threshold of significance for operational sources of noise. Auto-related noise impacts for other receptors would also be negligible given their more remote locations and/or the lack of a line of sight from the garage.

Table 8
Parking Garage-Related Impacts at Off-Site Sensitive Receptors

Receptor	Maximum Noise Level (dBA CNEL)	Existing Ambient Noise Level (dBA CNEL)	New Ambient Noise Level (dBA CNEL)	Increase (dBA CNEL)	Significant?
Residences – Missouri Avenue (south side)	42.6	53.6	53.9	0.3	No
Source: DKA Planning, 2025, using FTA Noise Impact Assessment Spreadsheet.					

Parking-related noise would include also include door slamming (generally instantaneous) and car alarms, while could last a few seconds. These activities would be within an enclosed garage structure and as such, shielded largely from nearby sensitive receptors. Therefore, the Project's parking garage activities would not have a significant impact on the surrounding noise environment.

Outdoor Uses

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

- Human conversation. This could include human conversation, socializing, and passive recreation in outdoor spaces, which could include:
 - Second floor patios. This would be shared use spaces along the west and north elevations for socializing or passive recreation (e.g., reading, dining), with intermittent use largely during day or evening hours. No powered speakers are proposed that would amplify either speech or music.

²⁷ Hourly trip generation based on Institute of Transportation Engineer's hourly trip generation factors for Multifamily Housing (Mid-Rise) (land use code 221).

- Private balconies on all floors. These would be private spaces for residents used for socializing or passive recreation (e.g., reading, dining), with intermittent use largely during day or evening hours. No powered speakers are proposed that would amplify either speech or music.
- Roof decks. Three decks totaling 1,455 square feet would be shared use spaces for socializing or passive recreation (e.g., reading, dining), with intermittent use largely during day or evening hours. There would be no direct line-of-sight from any roof deck noise to adjacent sensitive receptors, which would be 25 to 35 feet lower in height than the roof deck. Blocking the line of sight to a noise source generally results in a 5 decibel reduction.²⁸ The presence of the roof edge, parapet, and setback of decks from the roof's edge would shield any rooftop noise from the sensitive receptors near the Project Site. No powered speakers are proposed that would amplify either speech or music.

The primary use of these spaces would be for human conversation, which would produce negligible noise impacts, based on the Lombard effect. This phenomenon recognizes that voice noise levels in face-to-face conversations generally increase proportionally to background ambient noise levels. Specifically, vocal intensity increases about 0.38 dB for every 1.0 dB increase in noise levels above 55 dB.²⁹ For example, the sound of a human voice at 60 dB would produce a noise level of 39 dB at ten feet, which would not elevate ambient noise levels at any of the analyzed sensitive receptors by more than 0.2 dBA L_{eq} . Moreover, noise levels from human speech would attenuate rapidly with greater distance, resulting in a 33 dB noise level at twenty feet, and 27 dB at 40 feet.³⁰

- Trash collection. On-site trash and recyclable materials for the residents would be managed from the waste collection area on the P1 subterranean level of the parking garage. Dumpsters would be moved to the street manually or with container handler trucks that use hydraulic-powered lifts that use beeping alerts during operation. Haul trucks would access solid waste from Missouri Avenue, where solid waste activities would include use of trash compactors and hydraulics associated with the refuse trucks themselves. Noise levels of approximately 71 dBA L_{eq} and 66 dBA L_{eq} could be generated by collection trucks and trash compactors, respectively, at 50 feet of distance.³¹ As these noise events would be comparable to those associated with the trash pickup for the existing residences on the Project Site, the Proposed Project would not significantly elevate noise levels from intermittent trash collection events.
- Landscape maintenance. Noise from gas-powered leaf blowers, lawnmowers, and other landscape equipment can generate substantial bursts of noise during regular maintenance. For example, two gas powered leaf blowers with two-stroke engines and a hose vacuum can generate an average of 85.5 dBA L_{eq} and cause nuisance or potential noise impacts for nearby

²⁸ Washington State Department of Transportation, Noise Walls and Barriers. <https://wsdot.wa.gov/construction-planning/protecting-environment/noise-walls-barriers>.

²⁹ Acoustical Society of America, Volume 134; Evidence that the Lombard effect is frequency-specific in humans, Stowe and Golob, July 2013.

³⁰ Public Resources Code Section 21085 states that for residential projects, the effects of noise generated by project occupants and their guests on human beings is not a significant effect on the environment.

³¹ RK Engineering Group, Inc. Wal-Mart/Sam's Club reference noise level, 2003.

receptors.³² The landscape plan focuses on a modest palette of accent trees and raised planters that will minimize the need for powered landscaping equipment, as some of this can be managed by hand. As these noise events would be comparable to those associated with the landscape maintenance for the existing residences on the Project Site, the Proposed Project would not significantly elevate noise levels from intermittent maintenance activities.

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

Off-Site Operational Noise

The majority of the Project's operational noise impacts would be off-site from vehicles traveling to and from the development. The Project could add 133 net vehicle trips to the local roadway network on weekdays when the development could be leased and operational in 2028. The majority of vehicle-related impacts at the Project Site would come from 11 and 13 vehicles entering and exiting the development during the peak A.M. and P.M. hours, respectively.³³ This would represent a small addition to traffic volumes on local roadways. For example, it would represent 0.26 percent of the 4,211 vehicles currently using Santa Monica Boulevard at Overland Avenue in the A.M. peak hour.³⁴

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

Consistency with City General Plan Noise Element

While the City's Noise Element focuses on a number of measures for Citywide implementation by municipal government, there are some objectives, policies, and programs that are applicable to development projects. Table 9 summarizes the Proposed Project's consistency with these.

³² Erica Walker et al, Harvard School of Public Health; Characteristics of Lawn and Garden Equipment Sound; 2017. These equipment generated a range of 74.0-88.5 dBA L_{eq} at 50 feet.

³³ DKA Planning, 2025. Hourly trip generation based on Institute of Transportation Engineer's hourly trip generation factors for Multifamily Housing (Mid-Rise) (land use code 221).

³⁴ DKA Planning, 2025, based on City of Los Angeles database of traffic volumes on Santa Monica Boulevard at Overland Avenue, https://navigatela.lacity.org/dot/traffic_data/manual_counts/17016_OVESAN170214.pdf, 2017 traffic counts adjusted by one percent growth factor to represent existing conditions.

Table 9
Project Consistency with City of Los Angeles General Plan Noise Element

Objective/Policy/Program	Project Consistency
Policy 2.2: Enforce and/or implement applicable city, state, and federal regulations intended to mitigate proposed noise producing activities, reduce intrusive noise and alleviate noise that is deemed a public nuisance.	Consistent. The Project would comply with City, state, and other applicable noise regulations to ensure that noise impacts are considered less than significant.
Objective 3 (Land Use Development): Reduce or eliminate noise impacts associated with proposed development of land and changes in land use.	Consistent. The project is being evaluated under CEQA and would result in less-than-significant impacts on noise.
Program 11. For a proposed development project that is deemed to have a potentially significant noise impact on noise sensitive uses, as defined by this chapter, require mitigation measures, as appropriate, in accordance with California Environmental Quality Act and city procedures.	Consistent. The Project would not have a significant noise impact on noise-sensitive uses and as such, would not require mitigation under CEQA.
Program 12. When issuing discretionary permits for a proposed noise-sensitive use (as defined by this chapter) or a subdivision of four or more detached single-family units and which use is determined to be potentially significantly impacted by existing or proposed noise sources, require mitigation measures, as appropriate, in accordance with procedures set forth in the California Environmental Quality Act so as to achieve an interior noise level of a CNEL of 45 dB, or less, in any habitable room, as required by Los Angeles Municipal Code Section 91.	Consistent. The noise-sensitive project is being evaluated under CEQA and would before being entitled would comply with Building Code and Title 24 noise insulation requirements to achieve an interior noise level of 45 dB.
Source: DKA Planning, 2025.	

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

Less Than Significant Impact.

The Project Site is located about 2.5 miles northeast of the Santa Monica Airport and 6.9 miles north of Los Angeles International Airport. Because the Proposed Project would not be located within the vicinity of a private airstrip or within two miles of a public airport, the Project would not expose local workers or residents in the area to excessive noise levels. This would be considered a less than significant impact.

Cumulative Impacts

Construction

On-Site Construction Noise

During construction of the proposed Project, there could be other construction activity in the area that contributes to cumulative noise impacts at sensitive receptors. Noise from construction of development projects is localized and can affect noise-sensitive uses within 500 feet, based on the City's screening criteria. As such, noise from two construction sites within 1,000 feet of each other can contribute to cumulative noise impacts for receptors located between.

Construction-related noise levels from any related project would be intermittent and temporary. As with the Project, any related projects would comply with the LAMC's restrictions, including restrictions on construction hours and noise from powered equipment. Noise associated with cumulative construction activities would be reduced to the degree reasonably and technically feasible through proposed mitigation measures for each individual related project and compliance with the noise ordinance.

Any concurrent construction from related projects that occur between 7:00 A.M. and 7:00 P.M. Monday through Friday (and between 8:00 A.M. and 6:00 P.M. on Saturdays) would not have individually significant impacts on noise based on the City's guidance. As the City does not establish a numerical threshold above ambient noise levels, cumulative noise from concurrent construction projects would not be considered significant.

Any related project that involves nighttime construction activities could elevate ambient noise levels by 5 dBA or more at sensitive receptors and produce significant noise impacts during off-hours, pursuant to the City's guidance. However, the Proposed Project would not contribute to any cumulative construction noise impacts after hours, as it would not involve nighttime construction activities (i.e., between 7:00 P.M. and 7:00 A.M. Monday through Friday and between 6:00 P.M. and 8:00 A.M. on Saturdays, and anytime on Sundays or national holidays). Therefore, the Proposed Project would not contribute to any significant cumulative noise impacts from on-site construction activities.

There are two potential related projects identified by the City of Los Angeles within 0.25 miles of the Proposed Project (Table 10), illustrated in Figure 3.³⁵ However, both of the potential related projects are more than 1,000 feet from the Project Site. As a result, there are no reasonably foreseeable related projects that could contribute to cumulative noise impacts at the analyzed sensitive receptors.

³⁵ City of Los Angeles, Related Projects Summary from Case Logging and Tracking System, May 5, 2025.

Table 10
Related Projects Within 0.25 Miles of Project Site

#	Address	Distance from Project Site	Use	Size	Status
1	10306 Santa Monica Bl.	1,800 feet northeast	Apartments	116 units	Completed
2	10400 Santa Monica Bl.	1,200 feet northeast	Apartments	120 units	Pending

Source: Related Projects Summary from Case Logging and Tracking System Los Angeles Department of Transportation, May 5, 2025.

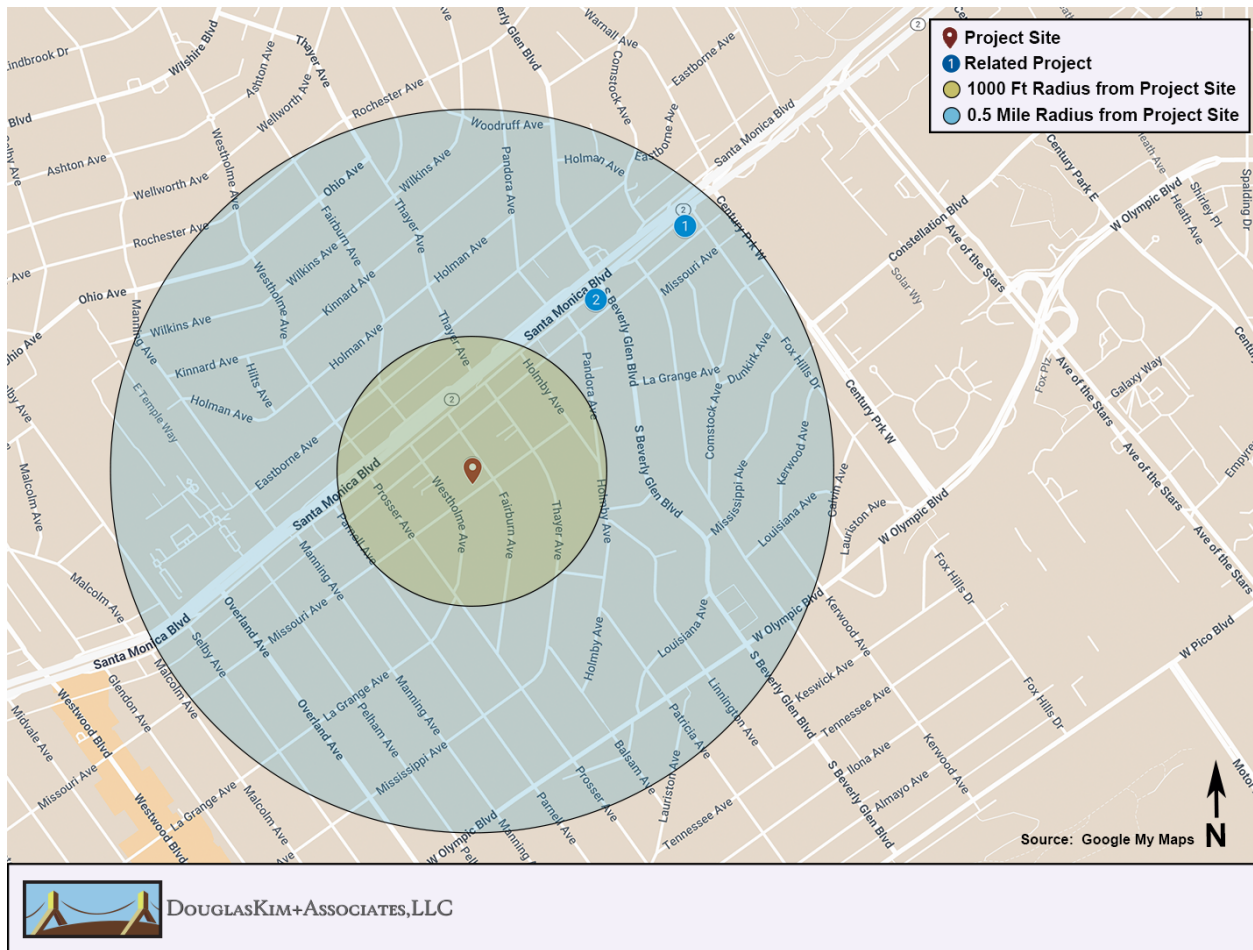


Figure 3
Location of Related Projects

Off-Site Construction Noise

Other concurrent construction activities from related projects can contribute to cumulative off-site impacts if haul trucks, vendor trucks, or worker trips for any related project(s) were to utilize the same roadways. Distributing trips to and from each related project construction site substantially

reduces the potential that cumulative development could more than double traffic volumes on existing streets, which would be necessary to increase ambient noise levels by 3 dBA. The Proposed Project would contribute 119 peak hourly PCE trips during the grading phase.³⁶ This would represent about 2.8 percent of traffic volumes on Santa Monica Boulevard, which carries about 4,211 vehicles at Overland Avenue in the morning peak hour of traffic.³⁷

Any concurrent construction from related projects that occurs between 7:00 A.M. and 7:00 P.M. Monday through Friday (and between 8:00 A.M. and 6:00 P.M. on Saturdays) would not have significant impacts on off-site noise based on the City's guidance. As the City does not establish a numerical threshold above ambient noise levels, cumulative daytime noise from off-site traffic from concurrent construction projects would not be considered significant. In terms of absolute noise impacts, cumulative traffic noise from multiple construction projects would not exceed 80 dBA $L_{eq(8-hour)}$ at sensitive uses along project roadways. As noted earlier, a doubling of traffic volumes on local roads would be necessary to generate noise levels equivalent to existing noise levels and elevate noise by 3 dBA L_{eq} . Instead, the marginal increase in traffic volumes from cumulative construction traffic would represent less than 60 dBA L_{eq} at sensitive receptors along local roads.

As noted earlier, there are no related projects within 1,000 feet of the Project Site that could substantially contribute to localized construction noise impacts on local roads. Therefore, cumulative noise impacts from off-site construction would be less than significant.

Operation

The Project Site and West Los Angeles neighborhood have been developed with residential and commercial land uses that have previously generated, and will continue to generate, noise from a number of operational noise sources, including mechanical equipment (e.g., HVAC systems), outdoor activity areas, and vehicle travel.

On-Site Stationary Noise Sources

Noise from on-site mechanical equipment (e.g., HVAC units) and any other human activities from related projects would not be typically associated with excessive noise generation that could result in increases of 5 dBA or more in ambient noise levels at sensitive receptors when combined with operational noise from the Proposed Project. As noted earlier, there are no related projects within 1,000 feet of the Project Site that could substantially contribute to localized operational noise impacts. Therefore, cumulative stationary source noise impacts associated with operation of the Project would be less than significant.

³⁶ This is a conservative, worst-case scenario, as it assumes all workers travel to the worksite at the same time and that vendor and haul trips are made in the same early hour, using the same route as haul trucks to travel to and from the Project Site.

³⁷ DKA Planning, 2025, based on City of Los Angeles database of traffic volumes on Santa Monica Boulevard at Overland Avenue, https://navigatela.lacity.org/dot/traffic_data/manual_counts/17016_OVESAN170214.pdf, 2017 traffic counts adjusted by one percent growth factor to represent existing conditions.

Off-Site Mobile Noise Sources

The Project would add 133 net vehicle trips to the local roadway network on weekdays when the development could be leased and operational in 2028. This would include 11 and 13 vehicles added to local roadways during the peak A.M. and P.M. hours, respectively.³⁸ This would represent a small addition to traffic volumes on local roadways. For example, it would represent 0.26 percent of the 4,211 vehicles currently using Santa Monica Boulevard at Overland Avenue in the A.M. peak hour.³⁹ Related projects would have to generate 4,200 additional vehicle trips onto Santa Monica Boulevard in the peak A.M. hour to elevate noise by 3 dBA. Instead, there are no related projects within 1,000 feet of the Project Site that could substantially contribute to cumulative traffic noise impacts.

Therefore, cumulative noise impacts due to off-site traffic would not increase ambient noise levels by 3 dBA to or within their respective “Normally Unacceptable” or “Clearly Unacceptable” noise categories, or by 5 dBA or greater overall. Additionally, the Project would not result in an exposure of persons to or a generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

³⁸ DKA Planning, 2025. Hourly trip generation based on Institute of Transportation Engineer’s hourly trip generation factors for Multifamily Housing (Mid-Rise) (land use code 221).

³⁹ DKA Planning, 2025, based on City of Los Angeles database of traffic volumes on Santa Monica Boulevard at Overland Avenue, https://navigatela.lacity.org/dot/traffic_data/manual_counts/17016_OVESAN170214.pdf, 2017 traffic counts adjusted by one percent growth factor to represent existing conditions.

TECHNICAL APPENDIX



DOUGLASKIM+ASSOCIATES,LLC

AMBIENT NOISE MEASUREMENTS



DOUGLASKIM+ASSOCIATES, LLC

Figure 1

Noise Measurement Locations

Session Report

5/9/2025

Information Panel

Name 1833 Fairburn Avenue

Comments

Start Time 5/7/2025 11:44:22 AM

Stop Time 5/7/2025 11:59:26 AM

Run Time 00:15:04

Serial Number SE40213991

Device Name SE40213991

Model Type Sound Examiner

Device Firmware Rev R.11F

Company Name

Description

Location

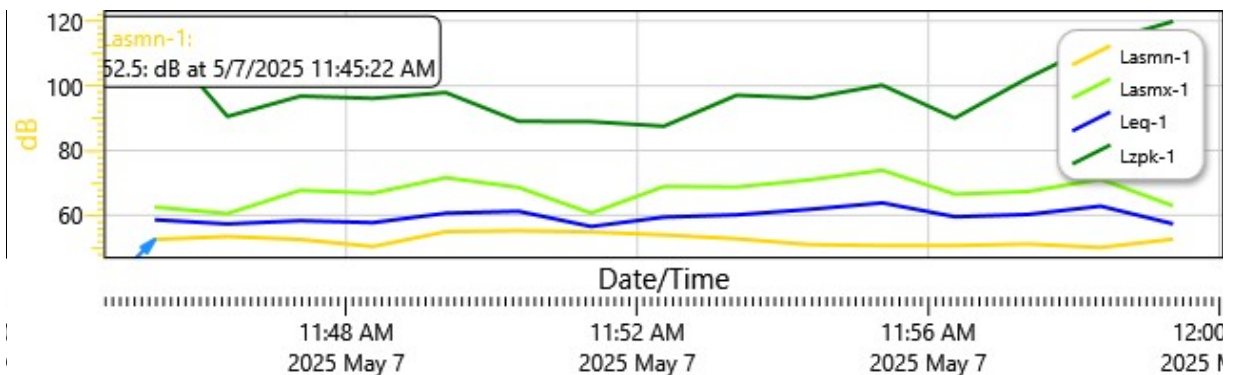
User Name

Summary Data Panel

Description	Meter	Value	Description	Meter	Value
Leq	1	60.1 dB			
Exchange Rate	1	3 dB	Weighting	1	A
Response	1	SLOW	Bandwidth	1	OFF

Logged Data Chart

1833 Fairburn Avenue: Logged Data Chart



Logged Data Table

Date/Time	Lzpk-1	Lasmn-1	Lasmx-1	Leq-1
5/7/2025 11:45:22 AM	116.5	52.5	62.5	58.6
11:46:22 AM	90.5	53.4	60.5	57.3
11:47:22 AM	96.8	52.5	67.7	58.3
11:48:22 AM	96.1	50.3	66.8	57.7
11:49:22 AM	97.9	54.9	71.6	60.6
11:50:22 AM	89	55.2	68.6	61.2
11:51:22 AM	88.9	54.8	60.6	56.5
11:52:22 AM	87.5	53.9	68.9	59.4
11:53:22 AM	97.1	52.7	68.7	60.1
11:54:22 AM	96.2	50.9	70.9	61.8
11:55:22 AM	100.2	50.6	73.9	63.8
11:56:22 AM	90	50.6	66.5	59.5
11:57:22 AM	102.4	51.1	67.3	60.2
11:58:22 AM	113.4	50	71.1	62.8
11:59:22 AM	119.9	52.6	62.9	57.3

Session Report

5/9/2025

Information Panel

Name 1901 Fairburn Avenue

Comments

Start Time 5/7/2025 11:59:52 AM

Stop Time 5/7/2025 12:14:54 PM

Run Time 00:15:02

Serial Number SE40213991

Device Name SE40213991

Model Type Sound Examiner

Device Firmware Rev R.11F

Company Name

Description

Location

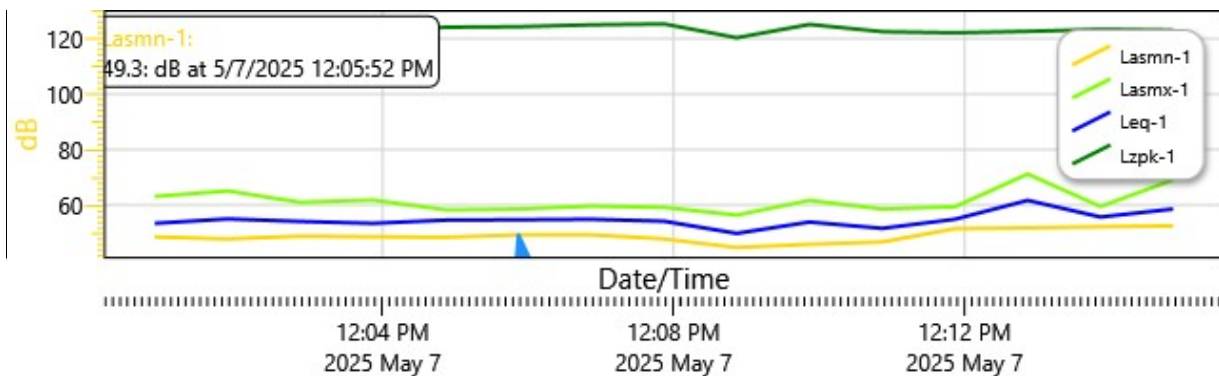
User Name

Summary Data Panel

Description	Meter	Value	Description	Meter	Value
Leq	1	55.6 dB			
Exchange Rate	1	3 dB	Weighting	1	A
Response	1	SLOW	Bandwidth	1	OFF

Logged Data Chart

1901 Fairburn Avenue: Logged Data Chart



Logged Data Table

Date/Time	Lzpk-1	Lasmn-1	Lasmx-1	Leq-1
5/7/2025 12:00:52 PM	123.8	48.5	63.1	53.4
12:01:52 PM	126.2	47.8	65.1	55
12:02:52 PM	123.6	48.8	61	54.1
12:03:52 PM	122.3	48.6	61.8	53.4
12:04:52 PM	124.1	48.4	58.3	54.6
12:05:52 PM	124.3	49.3	58.6	54.7
12:06:52 PM	125	49.3	59.6	54.9
12:07:52 PM	125.3	47.8	59.2	54.2
12:08:52 PM	120.3	44.7	56.4	49.8
12:09:52 PM	125.1	45.9	61.7	53.9
12:10:52 PM	122.5	46.7	58.6	51.6
12:11:52 PM	122.1	51.5	59.4	54.9
12:12:52 PM	122.6	51.8	71.2	61.7
12:13:52 PM	123.3	52.2	59.5	55.7
12:14:52 PM	123	52.5	69.1	58.6



DOUGLASKIM+ASSOCIATES,LLC

CONSTRUCTION NOISE CALCULATIONS

Noise emissions of industry sources

Source name	Size m/m²	Reference	Level			Corrections		
			Day dB(A)	Evening dB(A)	Night dB(A)	Cwall dB	CI dB	CT dB
Construction Site	1362 m²	Lw/unit	120.3	-	-	-	-	-

Receiver list

No.	Receiver name	Coordinates X Y in meter	Building side	Floor	Height abv.grd. m	Limit Day dB(A)	Level Day dB(A)	Conflict Day dB
1	Residence - 1901 Fairburn Ave.	11368328.843768988.22	North west	GF	78.31	-	78.6	-
2	Residences - 1833 Fairburn Ave.	11368309.633769046.32	North east	GF	81.50	-	72.8	-
3	Residences - 1838 Westholme Ave.	11368292.873768989.62	South east	GF	81.75	-	68.1	-
4	Residences - 1840 Fairburn Ave.	11368341.213769043.67	South west	GF	79.51	-	77.8	-

Contribution levels of the receivers

Source name	Traffic lane	Level Day dB(A)
Residence - 1901 Fairburn Ave. GF		78.6
Construction Site	-	78.6
Residences - 1833 Fairburn Ave. GF		72.8
Construction Site	-	72.8
Residences - 1838 Westholme Ave. GF		68.1
Construction Site	-	68.1
Residences - 1840 Fairburn Ave. GF		77.8
Construction Site	-	77.8

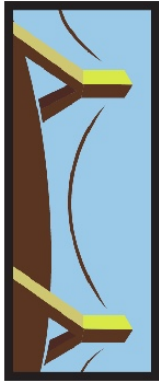


10535 Missouri Avenue

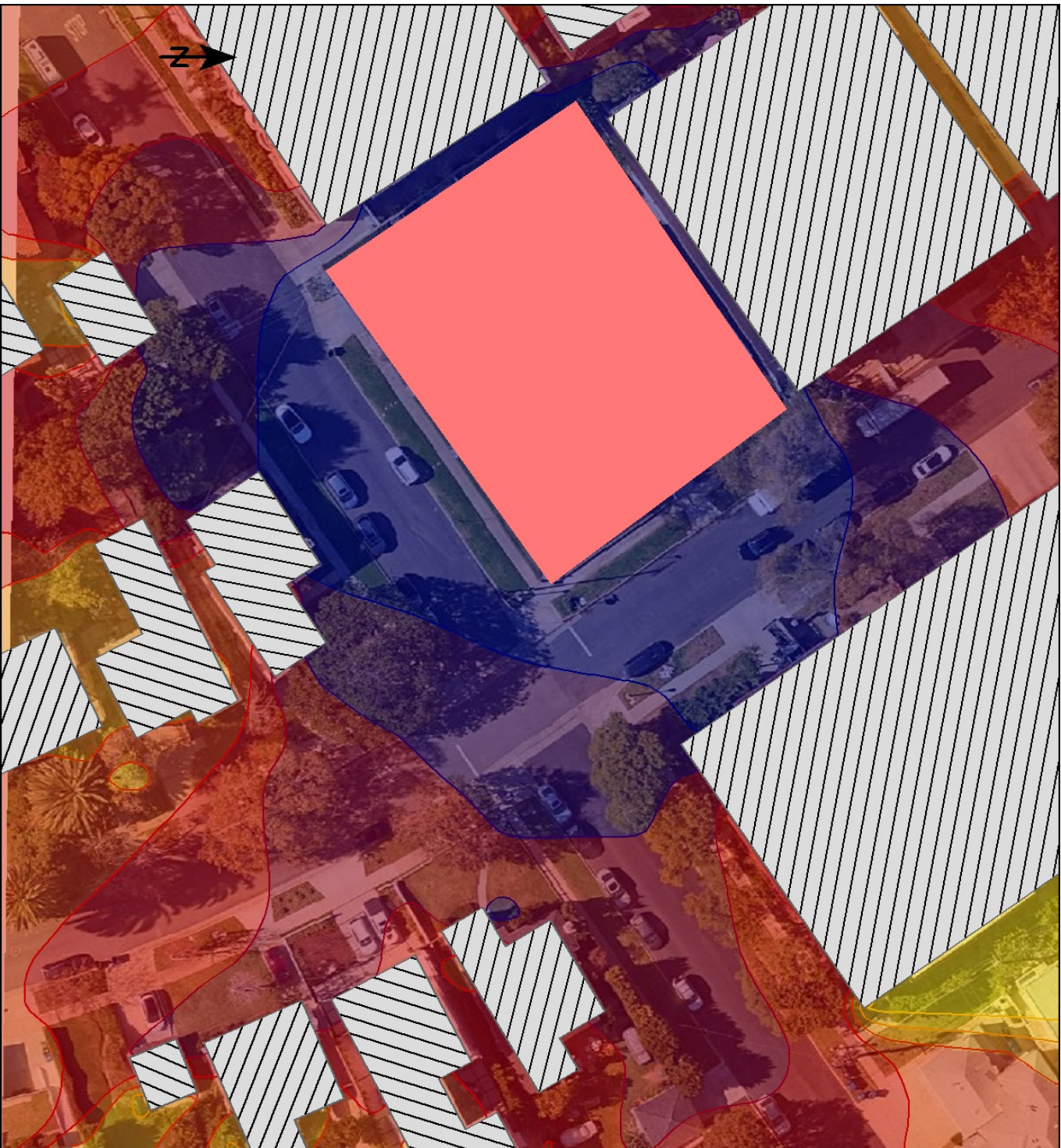
Signs and symbols

-  Building
-  Analyzed Sensitive Receptor
-  Construction Site

1 : 46
0 10 20 40 60 80
feet



DOUGLASKIM+ASSOCIATES, LLC

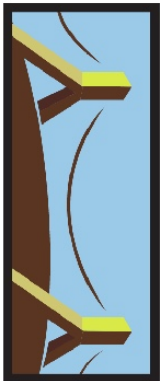
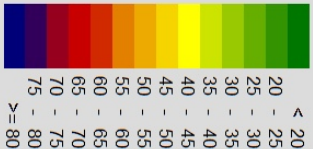


10535 Missouri Avenue

Signs and symbols

-  Building
-  Construction Site

Levels in dB(A)



DOUGLASSKIM+ASSOCIATES, LLC



DOUGLASKIM+ASSOCIATES,LLC

OPERATIONS NOISE CALCULATIONS

Number of Noise Sources:	1
Noise Source Parameters	Source 1

Downloaded from <http://ajph.org/> on November 10, 2015

Existing Ldn:	54 dBA
Total Project Ldn:	43 dBA
Total Noise Exposure:	54 dBA
Increase:	0 dB
Impact?:	None

Dist to Mod. Impact Contour:
(Source 1): 12 ft

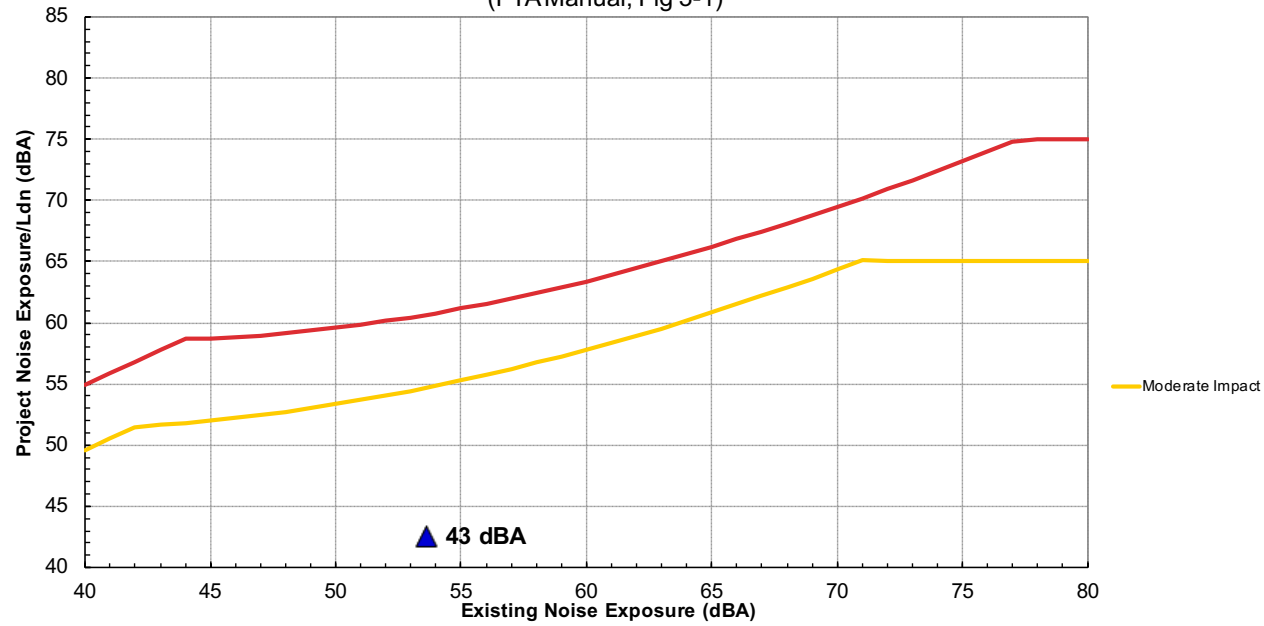
Dist to Sev. Impact Contour:
(Source 1): 7 ft

Leq(day): 39.2 dBA
Leq(night): 35.3 dBA
Ldn: 42.6 dBA

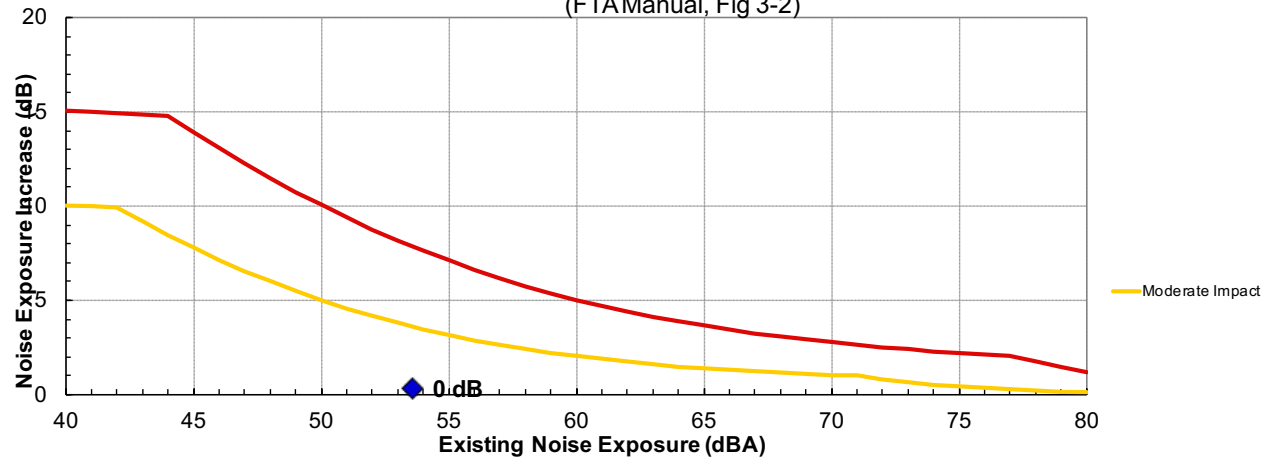
Project: 10535 Missouri Avenue
Receiver: Residences - Missouri Ave (south side)

Source	Distance	Project Ldn	Existing Ldn	Noise Criteria		Impact?
				Mod. Impact	Sev. Impact	
1 Parking Garage	35 ft	42.6 dBA	54 dBA	54 dBA	60 dBA	None
2 --	50 ft		54 dBA	54 dBA	60 dBA	
3 --	50 ft		54 dBA	54 dBA	60 dBA	
4 --	70 ft		54 dBA	54 dBA	60 dBA	
5 --	ft		54 dBA	54 dBA	60 dBA	
6 --	ft		54 dBA	54 dBA	60 dBA	
Combined Sources		43 dBA	54 dBA	54 dBA	60 dBA	None

Noise Impact Criteria
(FTAManual, Fig 3-1)



Increase in Cumulative Noise Levels Allowed
(FTAManual, Fig 3-2)





DOUGLASKIM+ASSOCIATES,LLC

TRAFFIC NOISE CALCULATIONS

Turning Movement Count Report AM

Location ID: 2A
 North/South: Overland Avenue
 East/West: Santa Monica Boulevard

Date: 02/14/17
 City: Los Angeles, CA

	Southbound			Westbound			Northbound			Eastbound			Totals:
	1	2	3	4	5	6	7	8	9	10	11	12	
Movements:	R	T	L	R	T	L	R	T	L	R	T	L	
07:00	0	0	0	0	316	20	19	0	28	17	361	0	761
07:15	0	0	0	0	380	13	17	0	54	19	440	0	923
07:30	0	0	0	0	426	36	19	0	82	27	380	0	970
07:45	0	0	0	0	386	41	31	0	48	32	512	0	1050
08:00	0	0	0	0	382	22	36	0	47	43	371	0	901
08:15	0	0	0	0	389	34	37	0	45	49	459	0	1013
08:30	0	0	0	0	387	37	39	0	46	57	442	0	1008
08:45	0	0	0	0	358	37	33	0	39	84	418	0	969
09:00	0	0	0	0	385	36	25	0	40	83	425	0	994
09:15	0	0	0	0	399	29	20	0	24	60	438	0	970
09:30	0	0	0	0	386	43	41	0	28	33	459	0	990
09:45	0	0	0	0	436	44	19	0	39	26	407	0	971

Total Volume:	0	0	0	0	4630	392	336	0	520	530	5112	0	11520
Approach %	0%	0%	0%	0%	92%	8%	39%	0%	61%	9%	91%	0%	

Peak Hr Begin:	8:15												
PHV	0	0	0	0	1519	144	134	0	170	273	1744	0	3984
PHF	0.000			0.981			0.894			0.993			0.983

Turning Movement Count Report PM

Location ID: 2A
 North/South: Overland Avenue
 East/West: Santa Monica Boulevard

Date: 02/14/17
 City: Los Angeles, CA

	Southbound			Westbound			Northbound			Eastbound			
	1	2	3	4	5	6	7	8	9	10	11	12	Totals:
Movements:	R	T	L	R	T	L	R	T	L	R	T	L	
15:00	0	0	0	0	409	60	32	0	37	26	342	0	906
15:15	0	0	0	0	471	62	29	0	41	29	362	0	994
15:30	0	0	0	0	391	58	34	0	32	38	368	0	921
15:45	0	0	0	0	436	66	25	0	48	36	322	0	933
16:00	0	0	0	0	365	72	41	0	43	41	349	0	911
16:15	0	0	0	0	424	74	44	0	49	34	331	0	956
16:30	0	0	0	0	425	66	25	0	40	33	350	0	939
16:45	0	0	0	0	408	60	34	0	47	40	377	0	966
17:00	0	0	0	0	411	69	23	0	35	43	378	0	959
17:15	0	0	0	0	493	97	33	0	43	48	382	0	1096
17:30	0	0	0	0	458	73	35	0	38	51	333	0	988
17:45	0	0	0	0	513	65	27	0	46	46	369	0	1066

Total Volume:	0	0	0	0	5204	822	382	0	499	465	4263	0	11635
Approach %	0%	0%	0%	0%	86%	14%	43%	0%	57%	10%	90%	0%	

Peak Hr Begin:	17:00												
PHV	0	0	0	0	1875	304	118	0	162	188	1462	0	4109
PHF	0.000			0.923			0.921			0.959			0.937

TRAFFIC VOLUME ADJUSTMENTS

North/South Overland Avenue
 East/West Santa Monica Boulevard
 Year 2017
 Hour 8:15-9:15 A.M.
 Source https://navigatela.lacity.org/dot/traffic_data/manual_counts/17016_OVESAN170214.pdf



	NB Approach	SB Approach	EB Approach	WB Approach	
LT					
TH					
RT					
Total			1663	2187	1.07%

2016	-	-	1,663	2,187	3,850
2017	-	-	1,680	2,209	3,889
2018	-	-	1,696	2,231	3,927
2019	-	-	1,713	2,253	3,967
2020	-	-	1,731	2,276	4,006
2021	-	-	1,748	2,299	4,046
2022	-	-	1,765	2,322	4,087
2023	-	-	1,783	2,345	4,128
2024	-	-	1,801	2,368	4,169
2025	-	-	1,819	2,392	4,211

	NB Approach	SB Approach	EB Approach	WB Approach		
Auto	-	-	1,442	1,896	6,048,810	82.5%
MDT	-	-	224	295	940,092	12.8%
HDT	-	-	6	8	25,348	0.3%
Buses	-	-	2	3	9,386	0.1%
MCY	-	-	40	52	167,287	2.3%
Aux	-	-	34	45	142,856	1.9%
Total	-	-	1,748	2,299	7,333,779	100.0%



DOUGLASKIM+ASSOCIATES,LLC

CUMULATIVE PROJECTS

RELATED PROJECTS

Centroid Info:

PROJ ID: 59141

Address: 10535 MISSOURI AV, CA

Lat/Long: 34.0535, -118.427

Buffer Radius:

1500

feet

Search

Column

Include NULL "Trip info":

☐

Include NULL "FirstStudySubmittalDate" (latest)

☐

Include "Inactive" projects:

☐

Include "Do not show in Related Project":

☐

Net_AM_Trips

- Select -

Net_PM_Trips

- Select -

Net_Daily_Trips

- Select -

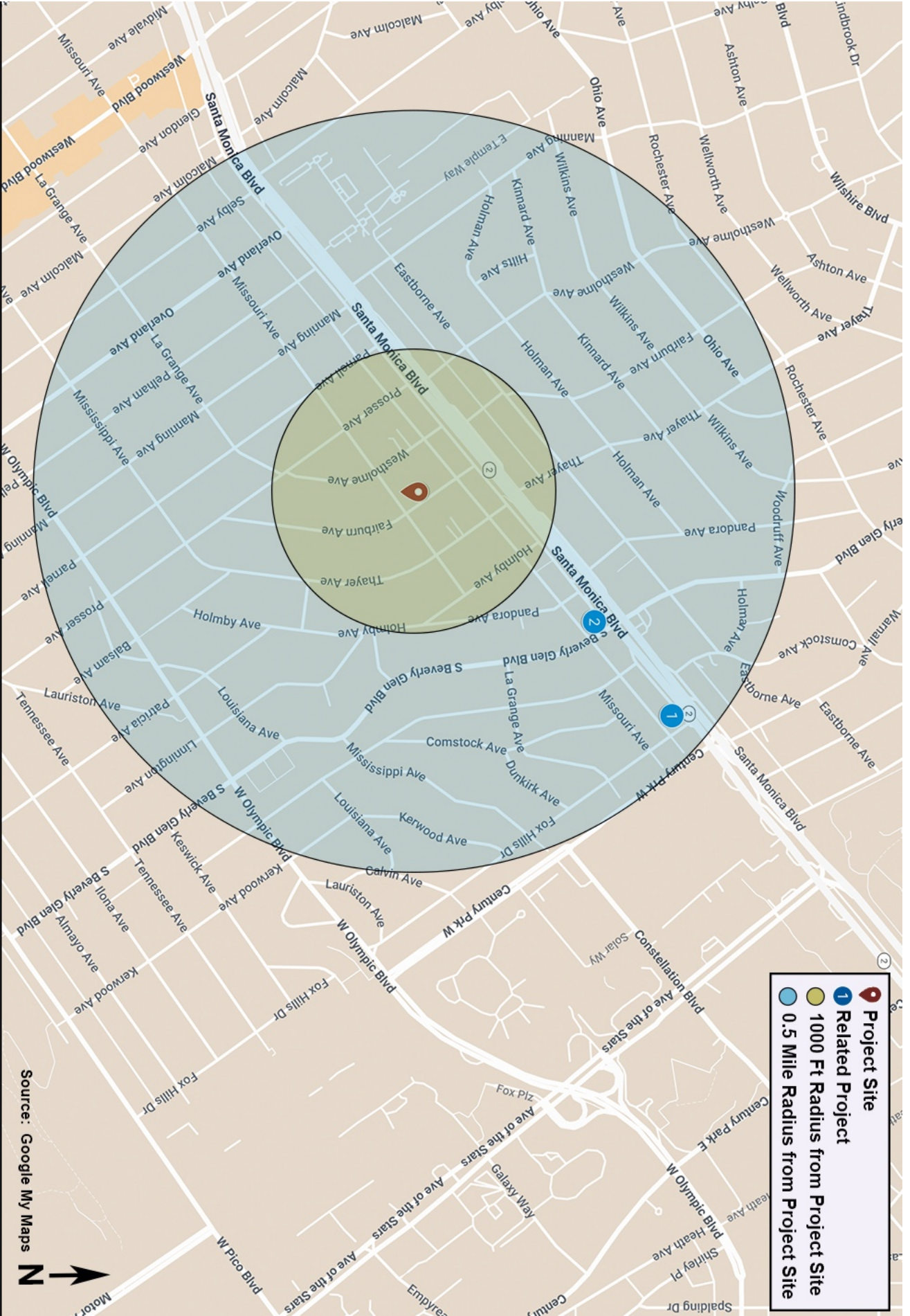
Record Count: 2 | Record Per Page: All Records

Results generated since: (5/5/2025 9:02:31 AM)

Proj ID	Office	Area	CD	Year	Project Title	Project Desc	Address	First Study	Inactive	Do not show	Distance (mile)	Trip Info										
								Submittal Date		in Related Project		Land_Use	Unit_ID	size	Net_AM_Trips	Net_PM_Trips	Net_Daily_Trips	NetAMIn	NetAMOut	NetPMIn	NetPMOut	
42731	Westchester	WLA	5	2014	26 Apt to 91 Apt or 116 Apt	5 parcels total. 26 Apt to 91 Apt or 116 Apt	10306 W SANTA MONICA BLVD	10/01/2018	☐	☐	0.4	Land_Use	Unit_ID	size	Net_AM_Trips	Net_PM_Trips	Net_Daily_Trips	NetAMIn	NetAMOut	NetPMIn	NetPMOut	
												Apartments	Total Units	116	46	44	598	9	37	29	15	
45576	Westchester	WLA	5	2017	Apartments, 96 Units	new 5-story,96-DU Apt bldg over 3-level parking(1-street & 2-basement)	10400 W SANTA MONICA BLVD	09/28/2017	☐	☐	0.3	Land_Use	Unit_ID	size	Net_AM_Trips	Net_PM_Trips	Net_Daily_Trips	NetAMIn	NetAMOut	NetPMIn	NetPMOut	
												Apartments	Total Units	121	53	50		10	43	32	18	



DOUGLASKIM+ASSOCIATES, LLC





Mar 25, 2026

**City of Los Angeles
City Planning Commission
200 North Spring Street
Los Angeles, CA 90012**

**Re: Proposed Housing Development Project at 7354 North Baird Avenue,
CPC-2024-3381-DB-CDO-VHCA**

To: cpc@lacity.org

**Cc: City Clerk's Office, clerk.cps@lacity.org, City Attorney's Office,
cityatty.help@lacity.org, Laura Frazinsteel, City Planner
laura.frazinsteel@lacity.org**

Dear Los Angeles Planning Commission,

The California Housing Defense Fund ("CalHDF") submits this letter to remind the City of its obligation to abide by all relevant state laws when evaluating the proposed 34-unit housing development project at 7354 North Baird Avenue, which includes 4 very low-income units. These laws include the Housing Accountability Act ("HAA"), the Density Bonus Law ("DBL"), AB 130, and California Environmental Quality Act ("CEQA") guidelines.

The HAA provides the project legal protections. It requires approval of zoning and general plan compliant housing development projects unless findings can be made regarding specific, objective, written health and safety hazards. (Gov. Code, § 65589.5, subds. (d), (j).) The HAA also bars cities from imposing conditions on the approval of such projects that would render the project infeasible (*id.* at subd. (d)) or reduce the project's density (*id.* at subd. (j)) unless, again, such written findings are made. As a development with at least two-thirds of its area devoted to residential uses, the project falls within the HAA's ambit, and it complies with local zoning code and the City's general plan. Increased density, concessions, and waivers that a project is entitled to under the DBL (Gov. Code, § 65915) do not render the project noncompliant with the zoning code or general plan, for purposes of the HAA (Gov. Code, § 65589.5, subd. (j)(3)). The HAA's protections therefore apply, and the City may not reject the project except based on health and safety standards, as outlined above. Furthermore, if the City rejects the project or impairs its feasibility, it must conduct "a

thorough analysis of the economic, social, and environmental effects of the action.” (*Id.* at subd. (b).)

CalHDF also writes to emphasize that the DBL offers the proposed development certain protections. The City must respect these protections. In addition to granting the increase in residential units allowed by the DBL, the City must not deny the project the proposed waivers and concessions with respect to a deviation from all of the permanent Q Conditions and Design Standards and Guidelines of the Reseda Central Business District; landscaping; front yard setback; north side yard setback; south side yard setback; rear yard setback; open space; short- and long-term bicycle parking; transitional height requirements; and required trees. If the City wishes to deny requested waivers, Government Code section 65915, subdivision (e)(1) requires findings that the waivers would have a specific, adverse impact upon health or safety, and for which there is no feasible method to satisfactorily mitigate or avoid the specific adverse impact. If the City wishes to deny requested concessions, Government Code section 65915, subdivision (d)(1) requires findings that the concessions would not result in identifiable and actual cost reductions, that the concessions would have a specific, adverse impact on public health or safety, or that the concessions are contrary to state or federal law. The City, if it makes any such findings, bears the burden of proof. (Gov. Code, § 65915, subd. (d)(4).) Of note, the DBL specifically allows for a reduction in required accessory parking in addition to the allowable waivers and concessions. (*Id.* at subd. (p).) Additionally, the California Court of Appeal has ruled that when an applicant has requested one or more waivers and/or concessions pursuant to the DBL, the City “may not apply any development standard that would physically preclude construction of that project as designed, even if the building includes ‘amenities’ beyond the bare minimum of building components.” (*Bankers Hill 150 v. City of San Diego* (2022) 74 Cal.App.5th 755, 775.)

Furthermore, the project is exempt from state environmental review under the Class 32 CEQA categorical exemption (In-Fill Development Projects) pursuant to section 15332 of the CEQA Guidelines, as the project is consistent with the applicable general plan designation and all applicable general plan policies as well as the applicable zoning designation and regulations; the proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses; the project site has no value as habitat for endangered, rare, or threatened species; approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality; and the site can be adequately served by all required utilities and public services. Furthermore, the project is eligible for a statutory exemption from CEQA pursuant to AB 130. (Pub. Res. Code, § 21080.66.) Caselaw from the California Court of Appeal affirms that local governments err, and may be sued, when they improperly refuse to grant a project a CEQA exemption or streamlined CEQA review to which it is entitled. (*Hilltop Group, Inc. v. County of San Diego* (2024) 99 Cal.App.5th 890, 911.)

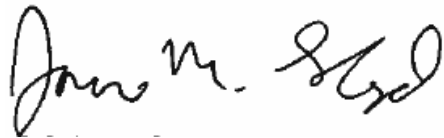
As you are well aware, California remains in the throes of a statewide crisis-level housing shortage. New housing such as this is a public benefit: by providing affordable housing, it will mitigate the state's homelessness crisis; it will increase the city's tax base; it will bring new customers to local businesses; and it will reduce displacement of existing residents by reducing competition for existing housing. It will also help cut down on transportation-related greenhouse gas emissions by providing housing in denser, more urban areas, as opposed to farther-flung regions in the state (and out of state). While no one project will solve the statewide housing crisis, the proposed development is a step in the right direction. CalHDF urges the City to approve it, consistent with its obligations under state law.

CalHDF is a 501(c)(3) non-profit corporation whose mission includes advocating for increased access to housing for Californians at all income levels, including low-income households. You may learn more about CalHDF at www.calhdf.org.

Sincerely,



Dylan Casey
CalHDF Executive Director



James M. Lloyd
CalHDF Director of Planning and Investigations



Mar 25, 2026

**City of Los Angeles
City Planning Commission
200 North Spring Street
Los Angeles, CA 90012**

**Re: Proposed Housing Development Project at 19333 West Ventura Boulevard,
CPC-2025-625-DB-SPPC-VHCA**

To: cpc@lacity.org

**Cc: City Clerk's Office, clerk.cps@lacity.org; City Attorney's Office,
cityatty.help@lacity.org; Adrineh Melkonian, City Planner
adrineh.melkonian@lacity.org**

Dear Los Angeles Planning Commission,

The California Housing Defense Fund ("CalHDF") submits this letter to remind the City of its obligation to abide by all relevant state laws when evaluating the proposed 46-unit housing development project at 19333 West Ventura Boulevard, which includes 6 very low-income units. These laws include the Housing Accountability Act ("HAA"), the Density Bonus Law ("DBL"), AB 130, and California Environmental Quality Act ("CEQA") guidelines.

The HAA provides the project legal protections. It requires approval of zoning and general plan compliant housing development projects unless findings can be made regarding specific, objective, written health and safety hazards. (Gov. Code, § 65589.5, subds. (d), (j).) The HAA also bars cities from imposing conditions on the approval of such projects that would render the project infeasible (*id.* at subd. (d)) or reduce the project's density (*id.* at subd. (j)) unless, again, such written findings are made. As a development with at least two-thirds of its area devoted to residential uses, the project falls within the HAA's ambit, and it complies with local zoning code and the City's general plan. Increased density, concessions, and waivers that a project is entitled to under the DBL (Gov. Code, § 65915) do not render the project noncompliant with the zoning code or general plan, for purposes of the HAA (Gov. Code, § 65589.5, subd. (j)(3)). The HAA's protections therefore apply, and the City may not reject the project except based on health and safety standards, as outlined above. Furthermore, if the City rejects the project or impairs its feasibility, it must conduct "a

thorough analysis of the economic, social, and environmental effects of the action.” (*Id.* at subd. (b).)

CalHDF also writes to emphasize that the DBL offers the proposed development certain protections. The City must respect these protections. In addition to granting the increase in residential units allowed by the DBL, the City must not deny the project the proposed waivers and concessions with respect to open space; front yard setback; loading area; lot coverage; floor area ratio; height; residential parking; commercial parking; number of stories; east side yard setback; west side yard setback; and roofline. If the City wishes to deny requested waivers, Government Code section 65915, subdivision (e)(1) requires findings that the waivers would have a specific, adverse impact upon health or safety, and for which there is no feasible method to satisfactorily mitigate or avoid the specific adverse impact. If the City wishes to deny requested concessions, Government Code section 65915, subdivision (d)(1) requires findings that the concessions would not result in identifiable and actual cost reductions, that the concessions would have a specific, adverse impact on public health or safety, or that the concessions are contrary to state or federal law. The City, if it makes any such findings, bears the burden of proof. (Gov. Code, § 65915, subd. (d)(4).) Of note, the DBL specifically allows for a reduction in required accessory parking in addition to the allowable waivers and concessions. (*Id.* at subd. (p).) Additionally, the California Court of Appeal has ruled that when an applicant has requested one or more waivers and/or concessions pursuant to the DBL, the City “may not apply any development standard that would physically preclude construction of that project as designed, even if the building includes ‘amenities’ beyond the bare minimum of building components.” (*Bankers Hill 150 v. City of San Diego* (2022) 74 Cal.App.5th 755, 775.)

Furthermore, the project is exempt from state environmental review under the Class 32 CEQA categorical exemption (In-Fill Development Projects) pursuant to section 15332 of the CEQA Guidelines, as the project is consistent with the applicable general plan designation and all applicable general plan policies as well as the applicable zoning designation and regulations; the proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses; the project site has no value as habitat for endangered, rare, or threatened species; approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality; and the site can be adequately served by all required utilities and public services. Furthermore, the project is eligible for a statutory exemption from CEQA pursuant to AB 130. (Pub. Res. Code, § 21080.66.) Caselaw from the California Court of Appeal affirms that local governments err, and may be sued, when they improperly refuse to grant a project a CEQA exemption or streamlined CEQA review to which it is entitled. (*Hilltop Group, Inc. v. County of San Diego* (2024) 99 Cal.App.5th 890, 911.)

As you are well aware, California remains in the throes of a statewide crisis-level housing shortage. New housing such as this is a public benefit: by providing affordable housing, it

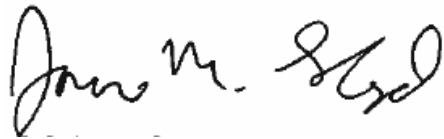
will mitigate the state's homelessness crisis; it will increase the city's tax base; it will bring new customers to local businesses; and it will reduce displacement of existing residents by reducing competition for existing housing. It will also help cut down on transportation-related greenhouse gas emissions by providing housing in denser, more urban areas, as opposed to farther-flung regions in the state (and out of state). While no one project will solve the statewide housing crisis, the proposed development is a step in the right direction. CalHDF urges the City to approve it, consistent with its obligations under state law.

CalHDF is a 501(c)(3) non-profit corporation whose mission includes advocating for increased access to housing for Californians at all income levels, including low-income households. You may learn more about CalHDF at www.calhdf.org.

Sincerely,



Dylan Casey
CalHDF Executive Director



James M. Lloyd
CalHDF Director of Planning and Investigations



Mar 25, 2026

**City of Los Angeles
City Planning Commission
200 North Spring Street
Los Angeles, CA 90012**

**Re: Proposed Housing Development Project at 900, 902, 904, 904 1/2, 906, 906 1/2
West Martin Luther King Jr Boulevard and 4011 South Menlo Avenue,
CPC-2023-6051-DB-HCA**

To: cpc@lacity.org

**Cc: City Clerk's Office, clerk.cps@lacity.org; City Attorney's Office,
cityatt.help@lacity.org; Maneri Roman, Planning Assistant
maneri.roman@lacity.org**

Dear Los Angeles Planning Commission,

The California Housing Defense Fund ("CalHDF") submits this letter to remind the City of its obligation to abide by all relevant state laws when evaluating the proposed 32-unit housing development project at 900, 902, 904, 904 1/2, 906, 906 1/2 West Martin Luther King Jr Boulevard and 4011 South Menlo Avenue, which includes 3 extremely low-income units and 2 very low-income units. These laws include the Housing Accountability Act ("HAA"), the Density Bonus Law ("DBL"), AB 130, and California Environmental Quality Act ("CEQA") guidelines.

The HAA provides the project legal protections. It requires approval of zoning and general plan compliant housing development projects unless findings can be made regarding specific, objective, written health and safety hazards. (Gov. Code, § 65589.5, subds. (d), (j).) The HAA also bars cities from imposing conditions on the approval of such projects that would render the project infeasible (*id.* at subd. (d)) or reduce the project's density (*id.* at subd. (j)) unless, again, such written findings are made. As a development with at least two-thirds of its area devoted to residential uses, the project falls within the HAA's ambit, and it complies with local zoning code and the City's general plan. Increased density, concessions, and waivers that a project is entitled to under the DBL (Gov. Code, § 65915) do not render the project noncompliant with the zoning code or general plan, for purposes of the HAA (Gov. Code, § 65589.5, subd. (j)(3)). The HAA's protections therefore apply, and the City may not

**2201 Broadway, PH1, Oakland, CA 94612
www.calhdf.org**

reject the project except based on health and safety standards, as outlined above. Furthermore, if the City rejects the project or impairs its feasibility, it must conduct “a thorough analysis of the economic, social, and environmental effects of the action.” (*Id.* at subd. (b).)

CalHDF also writes to emphasize that the DBL offers the proposed development certain protections. The City must respect these protections. In addition to granting the increase in residential units allowed by the DBL, the City must not deny the project the proposed waivers and concessions with respect to open space; floor area ratio; height; east side yard; west side yard; and rear yard. If the City wishes to deny requested waivers, Government Code section 65915, subdivision (e)(1) requires findings that the waivers would have a specific, adverse impact upon health or safety, and for which there is no feasible method to satisfactorily mitigate or avoid the specific adverse impact. If the City wishes to deny requested concessions, Government Code section 65915, subdivision (d)(1) requires findings that the concessions would not result in identifiable and actual cost reductions, that the concessions would have a specific, adverse impact on public health or safety, or that the concessions are contrary to state or federal law. The City, if it makes any such findings, bears the burden of proof. (Gov. Code, § 65915, subd. (d)(4).) Of note, the DBL specifically allows for a reduction in required accessory parking in addition to the allowable waivers and concessions. (*Id.* at subd. (p).) Additionally, the California Court of Appeal has ruled that when an applicant has requested one or more waivers and/or concessions pursuant to the DBL, the City “may not apply any development standard that would physically preclude construction of that project as designed, even if the building includes ‘amenities’ beyond the bare minimum of building components.” (*Bankers Hill 150 v. City of San Diego* (2022) 74 Cal.App.5th 755, 775.)

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As you are well aware, California remains in the throes of a statewide crisis-level housing shortage. New housing such as this is a public benefit: by providing affordable housing, it

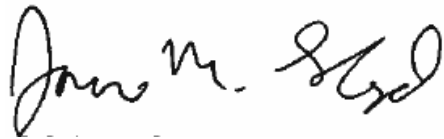
will mitigate the state's homelessness crisis; it will increase the city's tax base; it will bring new customers to local businesses; and it will reduce displacement of existing residents by reducing competition for existing housing. It will also help cut down on transportation-related greenhouse gas emissions by providing housing in denser, more urban areas, as opposed to farther-flung regions in the state (and out of state). While no one project will solve the statewide housing crisis, the proposed development is a step in the right direction. CalHDF urges the City to approve it, consistent with its obligations under state law.

CalHDF is a 501(c)(3) non-profit corporation whose mission includes advocating for increased access to housing for Californians at all income levels, including low-income households. You may learn more about CalHDF at www.calhdf.org.

Sincerely,



Dylan Casey
CalHDF Executive Director



James M. Lloyd
CalHDF Director of Planning and Investigations

Date: March 26, 2026

To:

Los Angeles City Planning Commission

200 N. Spring Street

Los Angeles, CA 90012

Re: Public Comment – Case No. CPC-2023-6051-DB-HCA

Project Address: 900–906 W. Martin Luther King Jr. Blvd., Los Angeles, CA

Dear Commissioners,

My name is Giovanni Garcia, and I serve as Chair of the Voices Neighborhood Council in Council District 9. I am submitting this comment in my personal capacity, not on behalf of the board.

I am writing to express serious concerns regarding the proposed development at 900–906 W. Martin Luther King Jr. Boulevard.

According to the City Planning report, the project proposes a six-story development consisting of 32 residential units and multiple commercial restaurant spaces, requiring the demolition of an existing apartment building and commercial structure.

Of the 32 proposed units, only five (5) units are designated as affordable—three (3) for Extremely Low-Income households and two (2) for Very Low-Income households.

At the same time, the applicant is requesting significant incentives and waivers, including but not limited to:

- Increasing the building from 4 stories to 6 stories
- More than doubling the allowable density with a 3.16 FAR instead of 1.5
- Reducing open space requirements
- Reducing yard setbacks

This represents a substantial deviation from standard zoning regulations in exchange for a limited number of affordable units.

I did meet directly with the property owner to better understand the proposal. However, following that meeting, the core concerns of the community remain unresolved.

Importantly, I have also spoken with current residents of the property—individuals and families who have resided there for years. These residents have expressed that they have not received clear or sufficient information regarding relocation assistance, nor have they been informed whether they will be able to return to the property upon completion of the development.

Additionally, residents have shared concerns regarding substandard living conditions, which raises serious questions about current property management practices. These conditions should be addressed through accountability and improvements—not through displacement without clear, enforceable protections.

Given these concerns, I respectfully urge that the property owner and developer be required to provide written, enforceable commitments to all current tenants, including:

- Full relocation benefits in compliance with Government Code Section 7260 and related laws
- A guaranteed Right to Return to a comparable unit within the new development
- A Right of First Refusal, ensuring that returning tenants have priority access
- And that any returning tenant who qualifies will be able to return at an affordable rent or cost, consistent with state housing law

These protections must be clearly communicated and guaranteed in writing to affected residents.

Furthermore, the project raises ongoing concerns regarding traffic, parking, and neighborhood impact. The proposal includes only 17 parking spaces, despite the addition of residential units and three commercial restaurant spaces, which is likely to exacerbate congestion in an already impacted corridor.

These concerns have been raised previously by both community members and the Voices Neighborhood Council, yet the project continues to move forward without meaningful revisions that reflect community input.

At its core, this proposal reflects a broader concern: **significant development incentives are being granted without proportional community benefit or sufficient protections for existing residents.**

For these reasons, I urge the Commission to carefully consider the impacts of this project and the lack of enforceable tenant protections.

I respectfully urge the Commissioners to take a stand—to stand with the community—and ensure that any development in South Los Angeles prioritizes equity, accountability, and the well-being of the residents who already call this neighborhood home.

Thank you for your time and consideration.

Sincerely,



Giovanni Garcia

Chair

📞 (213) 305-0472

✉ Giovanni.Garcia@voicesnc.org

🌐 Voicesnc.org

Alliance for a Regional Solution to Airport Congestion

(ARSAC)

7929 Breen Ave., Los Angeles, CA 90045 213-675-1817. ARSAC@WeLiveFree.com

March 25, 2026

President Monique Lawshe, LA City Planning Commission
Los Angeles City Planning Commission
200 N. Spring Street
Los Angeles, CA 90012

Re: Support for the LAX Sign District Ordinance Update

ARSAC supports the proposed LAX Sign District Update. ARSAC, for almost 30 years, has advocated to make LAX a world class airport that benefits of all of SoCal while maintaining the quality of life for all those living and working in the areas surrounding LAX. We have an active Settlement Agreement with LAWA on many facets of LAX design and operation.

Traffic control and signage is critical to both airport users AND communities around LAX.

The proposed Sign District Update reduces visual clutter by removing existing billboards while focusing on fewer, higher-quality, architecturally integrated signs.

The sign district focuses on airport serving commercial areas and mandates strong controls on illumination, size, motion, and placement—a win for all.

High-quality signage and coordinated design standards reflecting the scale and importance of LAX while supporting tourism, jobs, and airport-related economic activity.

The LAX Sign Design District appropriately includes funding for streetscape and pedestrian enhancements for our business districts located adjacent to LAX.

We appreciate your careful consideration and stand ready to assist as needed.

Sincerely,



Denny Schneider, President
Alliance for a Regional Solution to Airport Congestion

CC: Michelle Carter, City Planner, Esther Ahn, City Planner, LA City CM Tracy Park



523 West Sixth Street, Suite 826
Los Angeles, CA 90014

213 623 2489 OFFICE
213 623 3909 FAX
laconservancy.org

March 25, 2026

President Monique Lawshe
Los Angeles City Planning Commission
200 North Spring Street
Los Angeles, California 90012

Re: Support for the Amended LAX Sign District
CPC-2011-1964-SN-AMDT1

Dear President Lawshe and Honorable Commissioners,

I am writing on behalf of the Los Angeles Conservancy to express our support for the proposed amendment to the LAX Sign District that is before the Planning Commission for consideration. In 2015, the EIR for the LAX Sign District recognized two buildings within the project limits as historic resources, the Theme Building and 1961 Air Traffic Control Tower (ATCT).

As revisions to the Sign District were being considered, the Conservancy worked collaboratively with LAWA Staff to find solutions that allowed the ATCT to be used for signage to welcome visitors, celebrate special events, and display public art while respecting its historic character. LAWA Staff understood the Conservancy's desire that the City maintain its previous commitment to preserve the structure consistent with the Secretary of the Interior's Standards for Rehabilitation and nominate it as a City Historic-Cultural Monument.

LAWA Staff explored multiple options and developed a creative approach to maintain the significant features of the ATCT while wrapping the structure in LED bands aligned with each floor. Using this approach, the ATCT's outriggering structure is a core component of its design. LAWA will select a signage technology that will conform to the ATCT's unique shape, but shall also appear transparent at times, allowing visitors to experience the ATCT's historic charm.



We appreciate what emerged from our discussions with LAWA Staff: thoughtful revisions to the Sign District Ordinance which honor the historic elements of the ATCT while reimagining it as a modern icon. We will continue to collaborate with LAWA as they move forward with design and move through the nomination process to make the ATCT a recognized Historic-Cultural Monument.

We fully support the proposed Sign District Ordinance and recommend its approval by the Planning Commission. We look forward to working with LAWA Staff to complete ATCT's designation as a City Monument, and the enduring contribution the ATCT will continue to make in its historic place at LAX.

About the Los Angeles Conservancy:

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 5,000 member households throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education.

Sincerely,



Adrian Scott Fine
President & CEO

CC: Michelle Carter, City Planner - michelle.carter@lacity.org
Esther Ahn, City Planner - esther.ahn@lacity.org





Westwood South of Santa Monica Blvd Homeowners' Association
P.O. Box 64213, Los Angeles, CA 90064
wssmhoa.org • info@wssmhoa.org



March 24, 2026

Los Angeles City Planning Commission
VIA EMAIL: cpc@lacity.org

RE: DIR-2025-3079-DB-VHCA - 10535 W Missouri Avenue project. CPC 3/26 - Item 7

Dear Commission President Lawshe, Vice President Choe, and Honorable Commissioners:

Community members have been meeting and discussing the proposed project at Missouri and Fairburn. We would like to present and request that the following proposed project conditions be added to already stated project conditions when considered by the Commission when you hear the project.

The community is requesting that the City require the following project conditions which will not have any impact on the size or number of housing units planned. They will, however, address concerns and issues related to the construction of the project at the location targeted.

- 1) The Project must comply with AB 2712. The project and its residents are exempted from the boundaries of any nearby residential preferential parking districts. No preferential parking permits shall be available to tenants of the project. (There is a condition listed related to AB 2079, but no reference to AB 2712. There should be! (CM Yaroslavsky has said that in the absence of a Council motion on AB 2712, projects would individually have language that exempts projects that receive entitlements due to transit proximity from being eligible to obtain preferential parking permit access.)
- 2) The project is required to retain as a minimum landscaping designed and installed as part of the original project in perpetuity. The same number (or more) of planters and trees are to be maintained. Should potted trees die, they are to be replaced.
- 3) Trees planted on Missouri and Fairburn are to be cared for, watered and trimmed for a five year period to establish their presence and stability. Should any tree die, it will be replaced and the cycle of care re-started.
- 3a) Two mature trees located on the corner property were chopped down prior to project consideration. Can they be requested to be replaced on site or in the neighborhood on a nearby parkway?
- 4) The project will limit nighttime use of the rooftop facilities to no later than 8 pm on weekdays and 10 pm Friday and Saturday.

- 5) Staging of trucks (including haul route trucks) will not be done on local residential streets.
- 6) Parking for vehicles of construction workers will not be done on adjacent residential streets.
- 7) Project haul route trucks shall carry identification placard with project location on all trucks serving the site.
- 8) The expediter clearly told us that ALL of the units in the building would fall under the RSO program. Is that accurate. If not, can that be a project condition? For units that fall under the RSO, there shall be no pathway for the project to seek an exemption from the RSO in the future.
- 9) As the area has no public park/recreation facilities and the project has requested a reduction in required open space, it is important that the rec room/facility remain as such and may not be converted to any other use, including housing, in the future.

Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script, reading "Barbara Broide".

Barbara Broide, President



Westwood South of Santa Monica Blvd Homeowners' Association
P.O. Box 64213, Los Angeles, CA 90064
wssmhoa.org • info@wssmhoa.org



Westwood South of Santa Monica Blvd
P.O. Box 64213, Los Angeles, CA 90064
wssmhoa.org • info@wssmhoa.org



Mar 25, 2026

**City of Los Angeles
City Planning Commission
200 North Spring Street
Los Angeles, CA 90012**

Re: Proposed Housing Development Project at 10535 Missouri Avenue and 1847 South Fairburn Avenue, CPC-2025-3079-DB-VHCA

To: cpc@lacity.org

Cc: City Clerk's Office, clerk.cps@lacity.org; City Attorney's Office, cityatty.help@lacity.org; Julissa Lopez-Hodoyan, Planning Assistant julissa.lopez-hodoyan@lacity.org

Dear Los Angeles Planning Commission,

The California Housing Defense Fund ("CalHDF") submits this letter to remind the City of its obligation to abide by all relevant state laws when evaluating the proposed 39-unit housing development project at 10535 Missouri Avenue and 1847 South Fairburn Avenue, which includes 3 very low-income units and 3 moderate-income units. These laws include the Housing Accountability Act ("HAA"), the Density Bonus Law ("DBL"), AB 130, and California Environmental Quality Act ("CEQA") guidelines.

The HAA provides the project legal protections. It requires approval of zoning and general plan compliant housing development projects unless findings can be made regarding specific, objective, written health and safety hazards. (Gov. Code, § 65589.5, subds. (d), (j).) The HAA also bars cities from imposing conditions on the approval of such projects that would render the project infeasible (*id.* at subd. (d)) or reduce the project's density (*id.* at subd. (j)) unless, again, such written findings are made. As a development with at least two-thirds of its area devoted to residential uses, the project falls within the HAA's ambit, and it complies with local zoning code and the City's general plan. Increased density, concessions, and waivers that a project is entitled to under the DBL (Gov. Code, § 65915) do not render the project noncompliant with the zoning code or general plan, for purposes of the HAA (Gov. Code, § 65589.5, subd. (j)(3)). The HAA's protections therefore apply, and the City may not reject the project except based on health and safety standards, as outlined above. Furthermore, if the City rejects the project or impairs its feasibility, it must conduct "a

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thorough analysis of the economic, social, and environmental effects of the action.” (*Id.* at subd. (b).)

CalHDF also writes to emphasize that the DBL offers the proposed development certain protections. The City must respect these protections. In addition to granting the increase in residential units allowed by the DBL, the City must not deny the project the proposed waivers and concessions with respect to floor area ratio; height; north side yard; south side yard; and open space. If the City wishes to deny requested waivers, Government Code section 65915, subdivision (e)(1) requires findings that the waivers would have a specific, adverse impact upon health or safety, and for which there is no feasible method to satisfactorily mitigate or avoid the specific adverse impact. If the City wishes to deny requested concessions, Government Code section 65915, subdivision (d)(1) requires findings that the concessions would not result in identifiable and actual cost reductions, that the concessions would have a specific, adverse impact on public health or safety, or that the concessions are contrary to state or federal law. The City, if it makes any such findings, bears the burden of proof. (Gov. Code, § 65915, subd. (d)(4).) Of note, the DBL specifically allows for a reduction in required accessory parking in addition to the allowable waivers and concessions. (*Id.* at subd. (p).) Additionally, the California Court of Appeal has ruled that when an applicant has requested one or more waivers and/or concessions pursuant to the DBL, the City “may not apply any development standard that would physically preclude construction of that project as designed, even if the building includes ‘amenities’ beyond the bare minimum of building components.” (*Bankers Hill 150 v. City of San Diego* (2022) 74 Cal.App.5th 755, 775.)

Furthermore, the project is exempt from state environmental review under the Class 32 CEQA categorical exemption (In-Fill Development Projects) pursuant to section 15332 of the CEQA Guidelines, as the project is consistent with the applicable general plan designation and all applicable general plan policies as well as the applicable zoning designation and regulations; the proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses; the project site has no value as habitat for endangered, rare, or threatened species; approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality; and the site can be adequately served by all required utilities and public services. Furthermore, the project is eligible for a statutory exemption from CEQA pursuant to AB 130. (Pub. Res. Code, § 21080.66.) Caselaw from the California Court of Appeal affirms that local governments err, and may be sued, when they improperly refuse to grant a project a CEQA exemption or streamlined CEQA review to which it is entitled. (*Hilltop Group, Inc. v. County of San Diego* (2024) 99 Cal.App.5th 890, 911.)

As you are well aware, California remains in the throes of a statewide crisis-level housing shortage. New housing such as this is a public benefit: by providing affordable housing, it will mitigate the state’s homelessness crisis; it will increase the city’s tax base; it will bring new customers to local businesses; and it will reduce displacement of existing residents by

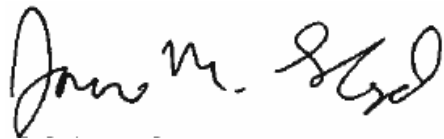
reducing competition for existing housing. It will also help cut down on transportation-related greenhouse gas emissions by providing housing in denser, more urban areas, as opposed to farther-flung regions in the state (and out of state). While no one project will solve the statewide housing crisis, the proposed development is a step in the right direction. CalHDF urges the City to approve it, consistent with its obligations under state law.

CalHDF is a 501(c)(3) non-profit corporation whose mission includes advocating for increased access to housing for Californians at all income levels, including low-income households. You may learn more about CalHDF at www.calhdf.org.

Sincerely,



Dylan Casey
CalHDF Executive Director



James M. Lloyd
CalHDF Director of Planning and Investigations

**BEFORE THE LOS ANGELES CITY PLANNING COMMISSION SUPPLEMENTAL
OBJECTION: FATAL FLAW IN CEQA PROJECT DESCRIPTION**

**RE: CASE NO. CPC-2025-3079-DB-VHCA / ENV-2025-3081-CE PROJECT ADDRESS: 10535
W. MISSOURI AVENUE / 1841 S. FAIRBURN AVENUE HEARING DATE: MARCH 26, 2026**

I. INTRODUCTION AND PURPOSE OF SUPPLEMENTAL FILING This Supplemental Objection is formally submitted to the administrative record on behalf of the Objectors, Keren Rosenthal and Tal Lev, residing at 1840 S. Fairburn Avenue. This filing supplements the Master Objection previously submitted and serves to specifically exhaust administrative remedies pursuant to Public Resources Code § 21177 regarding a fatal, foundational flaw in the applicant's California Environmental Quality Act (CEQA) clearance: the submission of an unstable, inaccurate, and legally deceptive Project Description.

The administrative record demonstrates that the applicant is actively concealing the true scope, scale, and programmatic use of the proposed building envelope. Because the formal Project Narrative and Environmental Assessment Form (EAF) intentionally omit approximately 6,000 square feet of programmatic volume that is secretly embedded within the architectural floor plans, the City of Los Angeles is legally prohibited from adopting the Class 32 Categorical Exemption.

II. FACTUAL BASIS: THE CONCEALMENT OF 6,000 SQUARE FEET OF "GHOST VOLUME" The applicant's formal Project Narrative, EAF, and published Project Description request the approval of a 39-unit multi-family residential building. However, a forensic review of the architectural floor plans reveals that the physical building envelope contains nine (9) massive, fully partitioned programmatic spaces labeled as "Recreation Rooms."

These nine rooms encompass approximately 6,000 square feet of prime, exterior-facing architectural volume. Crucially, four (4) of these "Recreation Rooms" are physically designed to mirror the exact geometric footprints, demising walls, egress corridors, and plumbing wet-walls of the habitable residential Unit #603 located on the 6th floor. If one ignores the text label "Rec Room," these spaces are physically indistinguishable from the residential dwelling units surrounding them, complete with separate toilet rooms large enough to accommodate bathtubs.

Despite the massive scale of this physical volume, the existence, scope, and total square footage of these nine rooms are systematically omitted from the applicant's written CEQA application:

- **The Project Narrative:** Contains zero mention of nine distinct "Recreation Rooms" comprising 6,000 square feet.
- **The Environmental Assessment Form (EAF):** Contains zero disclosure of this massive programmatic use.
- **The Development Information Summary:** Fails to list the total number or cumulative square footage of these rooms.

The applicant only explicitly identifies a single room—"Rec Room #2" on the second floor—buried within the Open Space Tabulation to justify a 25% open space reduction. The

remaining eight (8) "Recreation Rooms" (#1, and #3 through #9) are completely unaccounted for in any written programmatic summary, CEQA justification, or environmental metric. The applicant is hiding the foundational infrastructure of a 48-unit building behind the written description of a 39-unit building.

III. LEGAL ARGUMENT: VIOLATION OF CEQA PROJECT DESCRIPTION STANDARDS

Under established CEQA jurisprudence, the City Planning Commission cannot grant a Class 32 Exemption to a project that relies on a deceptive, curtailed, or incomplete Project Description.

In the landmark California Supreme Court precedent *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 192-193, the Court established the absolute standard for environmental review: "An accurate, stable and finite project description is the sine qua non of an informative and legally sufficient [environmental document]." The Court held that a curtailed or distorted project description prevents decision-makers and the public from intelligently evaluating the true environmental impacts of the development, noting that such obfuscation draws a "red herring" across the path of public scrutiny.

This standard has been repeatedly upheld, notably in *San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645, where the Court invalidated a CEQA clearance because the project description understated the true operational capacity and intensity of the proposed site.

By omitting the nine "Recreation Rooms" from the formal Project Narrative and EAF, the applicant has created a legally unstable and illusory Project Description. The City is currently evaluating traffic generation, Vehicle Miles Traveled (VMT), infrastructure demands, and density limits based on the applicant's written claim of 39 units, while simultaneously being asked to approve architectural floor plans containing the physical, unacknowledged volume of 48 units.

The City Planning Commission cannot legally adopt a CEQA Exemption when the written environmental application directly and materially contradicts the physical architectural plans. Granting an exemption based on an illusory Project Description constitutes a prejudicial abuse of discretion.

IV. CONCLUSION AND DEMAND The deliberate omission of the nine "Recreation Rooms" from the Project Narrative and EAF is not a clerical error; it is a calculated subterfuge designed to evade accurate VMT thresholds and conceal a premeditated Accessory Dwelling Unit (ADU) piecemealing scheme.

Because the Project Description is legally defective under *County of Inyo*, the Class 32 Categorical Exemption is void *ab initio*. The Objectors formally demand that the City Planning Commission reject the CEQA Exemption and deny the requested land-use entitlements until the applicant submits an accurate, stable, and finite Project Description that explicitly accounts for the intended operational use of all 6,000 square feet of hidden programmatic volume, subject to a full Environmental Impact Report (EIR).

Respectfully submitted,

Keren Rosenthal and Tal Lev 1840 S. Fairburn Avenue, Apt #302 Los Angeles, CA 90025