APPENDIX A
Original Comment Letters

FORM GEN. 160 (Rev. 8-12)

Comment Letter 1

CITY OF LOS ANGELES

INTER-DEPARTMENTAL CORRESPONDENCE

DATE: June 2, 2016

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

FROM: Ali Poosti, Division Manager
Wastewater Engineering Services Division
LA Sanitation

SUBJECT: **333 LA CIENEGA BOULEVARD PROJECT-NOTICE OF COMPLETION AND AVAILABILITY OF DRAFT ENVIRONMENTAL IMPACT REPORT**

This is in response to your May 19, 2016 letter requesting a review of your proposed mixed-use project located at 333 S. La Cienega Boulevard, Los Angeles, CA 90048. LA Sanitation has conducted a preliminary evaluation of the potential impacts to the wastewater and stormwater systems for the proposed project.

WASTEWATER REQUIREMENT

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

Projected Wastewater Discharges for the Proposed Project:

Type Description	Average Daily Flow per Type Description (GPD/UNIT)	Proposed No. of Units	Average Daily Flow (GPD)
Existing			
Commercial	50 GPD/1000 SQ.FT	181,379 SQ.FT	(9,069)
Proposed			
Retail	25 GPD/1000 SQ.FT	27,685 SQ.FT	692
Restaurant	720 GPD/1000 SQ.FT	3,370 SQ.FT	2,426
Storage	30 GPD/1000 SQ.FT	4,900 SQ.FT	147
Lobby/ Fitness Club	200 GPD/1000 SQ.FT	10,420 SQ.FT	2,084
Pool	7.48 GAL/ CU.FT	17,408 CU.FT	130,212
Residential: 1-BDRM	110/ DU	84 DU	9,240
Residential: 2-BDRMS	150/ DU	56 DU	8,400
Residential: 4-BDRMS	230/ DU	5 DU	1,150
Total			**145,282**

1-1

SEWER AVAILABILITY

The sewer infrastructure in the vicinity of the proposed project includes an existing 21-inch line on La Cienega Blvd. The sewage from the 21-inch line feeds into a 42-inch line on La Cienega Blvd before discharging into a 48-inch sewer line on Crescent Heights Blvd. Figure 1 shows the details of the sewer system within the vicinity of the project. The current flow level (d/D) in the 21-inch line cannot be determined at this time without additional gauging.

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

1-2

Pipe Diameter (in)	Pipe Location	Current Gauging d/D (%)	50% Design Capacity
21	La Cienega Blvd.	*	2.85 MGD
21	San Vicente Blvd.	46	2.85 MGD
42	La Cienega Blvd.	39	17.08 MGD
39	Crescent Heights Blvd.	49	16.43 MGD
48	Crescent Heights Blvd.	24	28.91 MGD

* No gauging available

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

1-3

If you have any questions, please call Eduardo Perez of my staff at (323) 342-6207.

STORMWATER REQUIREMENTS

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

POST-CONSTRUCTION MITIGATION REQUIREMENTS

The project requires implementation of stormwater mitigation measures. These requirements are based on Stormwater Low Impact Development (LID) requirements. The projects that are subject to LID are required to incorporate measures to mitigate the impact of stormwater runoff. The requirements are outlined in the guidance manual titled "*Development Best Management Practices Handbook – Part B: Planning Activities*". Current regulations prioritize infiltration, capture/use, and then biofiltration as the preferred stormwater control measures. The relevant documents can be found at: www.lastormwater.org. It is advised that input regarding LID requirements be received in the early phases of the project from WPD's plan-checking staff.

1-4

GREEN STREETS

The City is developing a Green Street Initiative that will require projects to implement Green Street elements in the parkway areas between the roadway and sidewalk of the public right-of-away to capture and retain stormwater and urban runoff to mitigate the impact of stormwater runoff and other environmental concerns. The goals of the Green Street elements are to improve the water quality of stormwater runoff, recharge local ground water basins, improve air quality, reduce the heat island effect of street pavement, enhance pedestrian use of sidewalks, and encourage alternate means of transportation. The Green Street elements may include infiltration systems, biofiltration swales, and permeable pavements where stormwater can be easily directed from the streets into the parkways and can be implemented in conjunction with the LID requirements. 1-5

CONSTRUCTION REQUIREMENTS

The project is required to implement stormwater control measures during its construction phase. All projects are subject to a set of minimum control measures to lessen the impact of stormwater pollution. In addition for projects that involve construction during the rainy season that is between October 1 and April 15, a Wet Weather Erosion Control Plan is required to be prepared. Also projects that disturb more than one-acre of land are subject to the California General Construction Stormwater Permit. As part of this requirement a Notice of Intent (NOI) needs to be filed with the State of California and a Storm Water Pollution Prevention Plan (SWPPP) needs to be prepared. The SWPPP must be maintained on-site during the duration of construction. 1-6

If there are questions regarding the stormwater requirements, please call Kosta Kaporis at (213) 485-0586, or WPD's plan-checking counter at (213) 482-7066. WPD's plan-checking counter can also be visited at 201 N. Figueroa, 3rd Fl, Station 18.

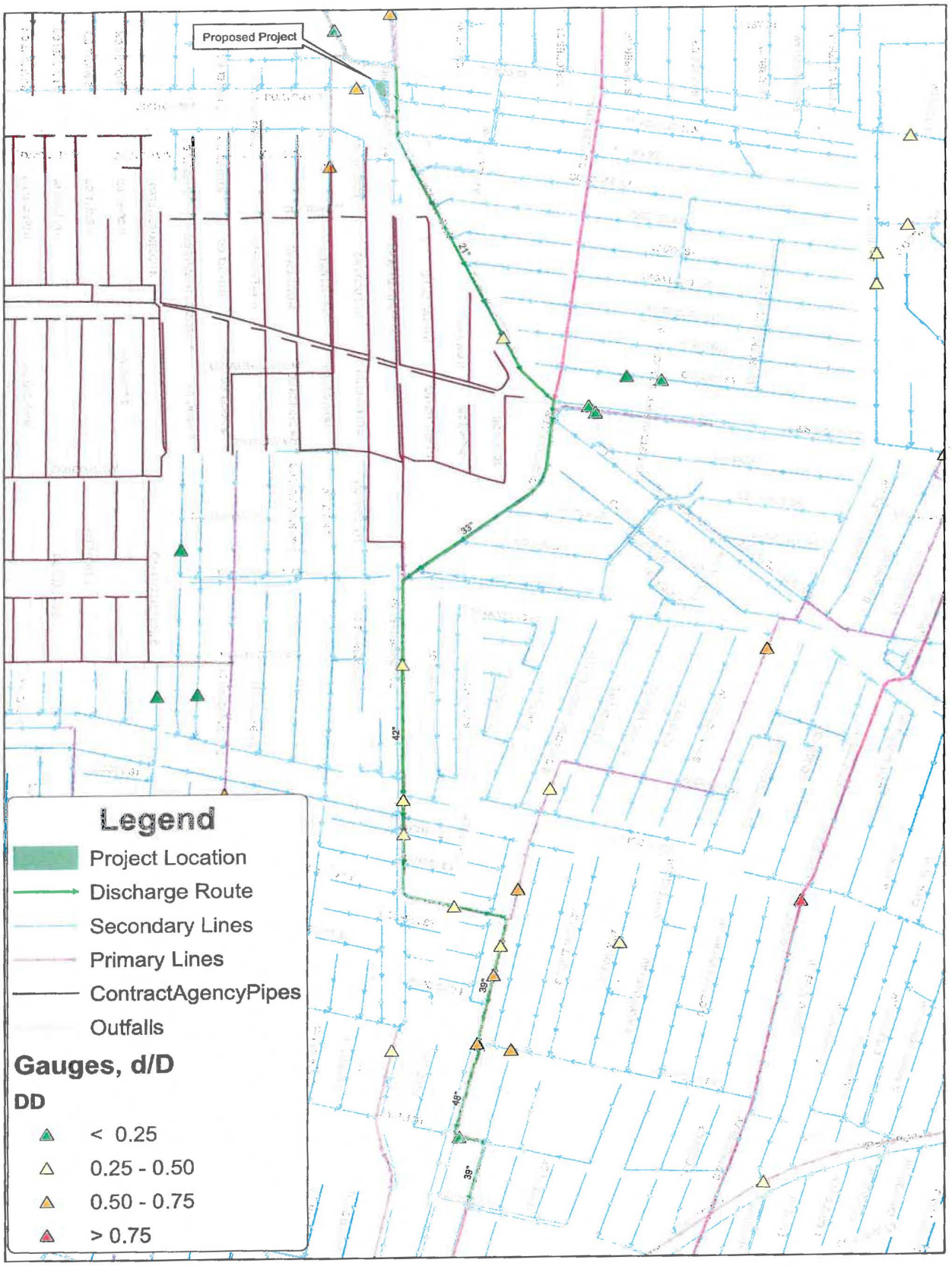
SOLID RESOURCE REQUIREMENTS

The City has a standard requirement that applies to all proposed residential developments of four or more units or where the addition of floor areas is 25 percent or more, and all other development projects where the addition of floor area is 30 percent or more. Such developments must set aside a recycling area or room for onsite recycling activities. For more details of this requirement, please contact Daniel Hackney of the Special Project Division at (213)485-3684. 1-7

EP/AP:as

Attachment: Figure 1 – Sewer Map

c: Kosta Kaporis, LASAN
Daniel Hackney, LASAN
Eduardo Perez, LASAN



Wastewater Engineering Services Division
Bureau of Sanitation
City of Los Angeles

Figure 1
333 S La Cienega Blvd
Sewer Map

N
W E
S

0 275 550 1,100 1,650 2,200
Feet

Comment Letter 2

July 5, 2016

Alejandro Huerta
Environmental Analysis Section
Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012

RE: Notice of Completion and Availability of Draft Environmental Impact Report (ENV-2015-897-EIR)

Dear Alejandro Huerta:

Thank you for providing the City of Beverly Hills (City) with the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the 333 S. La Cienega Boulevard Project (Project). Due to the Project's close proximity to the City of Beverly Hills, there is a potential that the City of Beverly Hills and its residents could experience negative impacts both during the construction of the Project and as a result of operation thereafter. We have reviewed the DEIR and have the following comments: 2-1

TRAFFIC

1. The City of Beverly Hills disagrees with the trip generation assumptions and does not find them justifiable. We request that revised trip generation and assignments be used in the Final EIR, especially for Beverly Hills internal and adjacent intersections. The City disagrees with the following assumptions: 2-2

    a. 40% reduction of trips for pass-by trips for the proposed supermarket

    b. 15% reduction of trips for transit and walk for proposed apartments

c. 10% reduction of pass-by trips for restaurant. 2-2

2. The City has concerns regarding the additional trips that will be caused by the project during operation. The City requests that Transportation Demand Management strategies be integrated into the project. 2-3

3. The intersection at Beverly Boulevard and Doheny Drive is shared between the City of West Hollywood and the City of Beverly Hills. 2-4

CONSTRUCTION

1. The DEIR indicates that the heavy haul route passes through the City of Beverly Hills (La Cienega Boulevard), please ensure that the project is in compliance with the Beverly Hills heavy haul regulations. 2-5

2. Due to the proximity of the Project to Cedar's Sinai Medical Center, the City has concerns about increased traffic as a result of lane closures and road blocks along streets that provide access to the Medical Center from the City. The DEIR indicates that portions of San Vicente and La Cienega Boulevards may be closed during construction. If it is necessary to close travel lanes please keep the City apprised of any upcoming road blocks/closures during project construction so that the Fire Department has access to this information and can adjust routes as appropriate. The City requests that the Project Design Feature (Page 4.4-26) that references coordination with the City (of Los Angeles) also include coordination with the City of Beverly Hills andservice providers to ensure adequate access is maintained to the project site and neighboring businesses (and medical facilities). Please inform the City of Beverly Hills about any scheduled lane or street closures. 2-6

Please contact **Timothea Tway at (310) 285-1122** to inform the City of any road closures due to construction and to discuss mitigation measures should additional significant impacts be identified, as outlined above. If you have any questions regarding this letter, please feel free to contact me at (310) 285-1118 or by email at rgohlich@beverlyhills.org. 2-7

Sincerely,

RYAN GOHLICH, AICP
Assistant Director/City Planner
Community Development Department

cc: Mahdi Aluzri, City Manager
George Chavez, Assistant City Manager
Susan Healy Keene, AICP, Director of Community Development
Aaron Kunz, AICP, Deputy Director of Transportation
Scott Stephens, Fire Battalion Chief
Lincoln Hoshino, Police Lieutenant

Comment Letter 3

BURTON WAY HOMEOWNERS ASSOCIATION

479 South Sherbourne Drive • Los Angeles, CA 90048-4010 • Tel: 310 271-0568 / Fax: 310 271-3974

June 22, 2016

Re: Case # ENV-2015-897-EIR, 333 S. La Cienega Blvd. (Caruso Project)

Att: Alejandro Huerta
Los Angeles City Planning Dept.

The Burton Way Homeowners Association represents the residents and immediate neighbors of the proposed development at 333 S. La Cienega Blvd. We write to support the project as being an appropriate use for this unique site.

Our review of subject EIR has revealed NO problems for this community that were not addressed during the past year of meetings with the developer. We shared our concerns during that time and our concerns were incorporated in the final draft. We are pleased with the incorporation of our suggestions for improvement and acknowledge the significant investment in street scape and walkability surrounding this project.

3-1

We look forward to continued dialogue and cooperation with the developer and his team during the development process. In the meantime we support this project and urge the adoption of this EIR.

Sincerely,

Harald R. Hahn, President

cc: Hon. Paul Koretz, Councilman CD 5
Shawn Bayliss, Planning Deputy CD-5

Westbury Terrace Homeowners Association/Board of Directors

321 S. San Vicente Blvd.

Los Angeles, CA 90048

June 25, 2016

Alejandro Huerta

Environmental Analysis Section

Department of City Planning

200 N. Spring Street, Room 750

Los Angeles, CA 90012

Re: 333 La Cienega - ENV-2015-897-EIR (Support & Endorsement)

Dear Mr. Huerta,

The Westbury Terrace Homeowner Association (HOA) supports and endorses the Caruso Affiliated/CRM Properties project at 333 La Cienega Boulevard. Westbury Terrace is an 82-unit condominium building located at 321 S. San Vicente Boulevard, directly across the street from the proposed project and is the closest residential property to the site.

When the 333 La Cienega project was first announced, many of our homeowners had questions about impact that the proposed project would have on our quality of life and property values. These included questions about construction noise and dust, potential for increased traffic, impacts on views from our east facing units, and how our overall day-to-day life would change with this new building. I am pleased to report that the HOA's environmental and traffic questions have been satisfied by the information contained in the Draft Environmental Impact Report and all other issues have been resolved to our satisfaction. 4-1

We have been familiar with Caruso Affiliated for over 25 years from when they first built the Loehmann's building on the site of the proposed project and also for their 8500 Burton Way apartment building across the street. Both properties have always been well -maintained and good neighbors. The Trader Joe's and Larder restaurant that were added as part of the 8500 Burton project have been welcomed additions to our neighborhood.

Since proposing the new project, Caruso Affiliated has been a straightforward, honest, and collaborative neighbor. In February 2016, Rick Caruso hosted a HOA town hall meeting where he presented the project and spent two hours answering questions and hearing concerns. Since then, they have met with the HOA and dozens of individual residents on numerous occasions to address comments and questions.

Change can be difficult especially for those of us, including me, who have lived at Westbury Terrace for 25 years or more. However, we recognize the tremendous benefits that the 333 La Cienega project will bring to our quality of life. Specifically, Caruso Affiliated is committed to making the crosswalks safer, landscaping and maintaining the street medians, establishing a welcoming open space at the corner of La Cienega and San Vicente, and exploring other improvements to help reduce gridlock and make our neighborhood more walk able.

Many of us are also looking forward to walking to a new grocery store and dining at their new restaurant.

We urge the City Planning Department and the Los Angeles City Council to approve this project.

4-1

Sincerely,

Philippe Cohanim, President

Westbury Terrace Homeowners Association

Comment Letter 5

---------- Forwarded message ----------
From: <info@westthirdstreet.com>
Date: Tue, Jul 5, 2016 at 10:47 AM
Subject: Case #ENV-2015- 897 EIR (333 La Cienega Bl.)
To: Alejandro.Huerta@lacity.org
Cc: Shawn.bayliss@lacity.org, Paul.koretz@lacity.org, Mott Smith <msmith@civicenterprise.com>

Re: Case #ENV-2015- 897 EIR (333 La Cienega Bl.)

Dear Alejandro,

The West 3rd Street Business Association is pleased to offer our full support for the proposed project at 333 S. La Cienega Boulevard. This is an important project that will enhance the entire neighborhood. As businesses owners along the vibrant West 3 rd Street corridor, we support projects and initiatives that demonstrate a commitment to pedestrian safety, improved infrastructure, and an overall better quality of life. Caruso Affiliated's 333 S. La Cienega includes all three components. It will add a high-quality mixed use residential building with much needed transit-oriented housing. Our city needs new housing, and this is an appropriate location new housing at urban density.

The project promotes walkability and pedestrian safety through Caruso Affiliated's commitment to improving existing crosswalks, adding a new crosswalk at Blackburn Ave and La Cienega, and building a new bus shelter at San Vicente and La Cienega. These will be critical improvements to better connect residents, workers, and businesses on either side of La Cienega. The design includes a 7,000 square foot outdoor plaza at San Vicente and La Cienega along with new street trees, outdoor dining, and lighting. This will be a great extension of the vibrant pedestrian experience that makes the West 3 rd Street area one of the vibrant neighborhoods in Los Angeles.

Finally, we appreciate Caruso Affiliated's continued outreach and collaboration with our member businesses. They have not only kept us updated on the project since its inception, but have also solicited our advice and feedback on how 333 S. La Cienega can best benefit the entire neighborhood. Again, we offer our full support and urge the City of Los Angeles to approve this project.

5-1

Sincerely,

Paul Witt

President of W3rd Street Business Association

W3rd St Board:
Paul, Deborah, Mindy, Liz

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Comment Letter 6

BEVERLY-WILSHIRE HOMES ASSOCIATION, INC.

A NON-PROFIT CORPORATION DEDICATED TO COMMUNITY IMPROVEMENT AND LOWER PROPERTY TAXES

8443 West Fourth Street ● Los Angeles, CA 90048-4101 ● Phone 323/653-6254 & 323/653-5357 e-mail TheBWHA2@AOL.COM

Date: July 5, 2016

To: Alejandro Huerta
Environmental Analysis Section
Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012

From: Beverly Wilshire Homes Association Inc.
8443 West Fourth Street
Los Angeles, CA 90048
theBWHA2@aol.com

Re: Comments on DEIR for 333 La Cienega Boulevard Project
ENV-2015-897-EIR
Submitted by Hand Delivery

Dear Mr. Huerta,

Thank you for the opportunity to comment on this case.

The Beverly Wilshire Homes Association is a non-profit, incorporated organization of property owners, residents and businesses within the area bounded by La Brea to La Cienega and Rosewood to the north side of Wilshire Blvd. From 1956 to the present we have been the voice of the community. Our mission is to improve the quality of life for our members and for the community.

This proposed project studied in the Draft Environmental impact Report is adjacent to our western border and will have potentially severe impacts to our members.

6-1

Summary: The Beverly Wilshire Homes Association supports either of the Environmentally Superior Alternatives presented in the DEIR, specifically (ES.6) Alternative 1: No Project Alternative or Alternative 2: Existing Zoning Alternative.

These are our reasons. They go beyond unmitigatable construction noise because it is our contention that there are other unmitigatable adverse impacts that are not properly evaluated in the Draft Environmental Impact Report for this proposed project.

6-2

Comments on Specific DEIR Sections

Section ES.5 Project Objectives.

Bullet #1: Develop an under-utilized site.

Comment: We welcome aesthetically, well-designed mixed-use buildings that compliment the community character. This would be best achieved by Alternative 2. Not a streamline moderne building that is two to three times the height of surrounding buildings, only one of which has the same architectural style, which is another project by the same developer that was not intended to become a precedent for future development.

Bullet #2: Provide a high quality, high-density project near transit lines.

Comment: We also welcome new projects that interface with nearby public transit options, which, is why we contend that Alternatives 1 or 2 should be chosen. This project, Alternative 4, is a luxury project that will not have transit users. In fact, according to press reports, the project will have a concierge service that provides on-call luxury cars, with drivers, to tenants 24/7. To maximize transit use, the project would need to have an affordable rent structure that would serve transit-dependent residents: the elderly, students, disabled, and the working poor. As is, the building's rent structure appears to be approximately ten times the affordable rent level for Los Angeles.

6-2

Bullets #3 and #4: Ground level open space and pedestrian-orientation.

Comment: We also welcome a pedestrian environment at this location, including a water element, but this could be just as easily achieved by Alternatives 1 or 2. Furthermore, these options would have a pedestrian-scaled building, not one that soars 240 feet above sidewalks, and at least 150 feet above other nearby buildings.

Bullet #5: Provide housing opportunities that reduce vehicle miles traveled.

Comment: We also support projects that provide local housing opportunities near employment, goods, and services to reduce VMT, but that goal would be more easily achieved by either of the environmentally superior alternatives. This is because they could serve local residents looking for services or housing in their neighborhood, not a luxury residential building with an international clientele, approximately one-half of whom only use their apartments several weeks a year when visiting Los Angeles. Furthermore, most of these tenants would be

newcomers to this neighborhood, and they would add to local miles traveled, not reduce it, when they entered and left the building in chauffeur-driven luxury cars.

Bullet #6: This location is near compatible uses.

Comment: This objective uses another Caruso project, 8500 Burton Way, as a precedent for approving this project. Our association objected to 8500 Burton Way because it would become a precedent to push through the height and density limits of the existing Wilshire Community Plan, and we now extend this same argument to 333 La Cienega. We do not want a spot-zone change or spot-General Plan Amendment for this location to become yet another precedent for similar projects.

Bullet #7: Create new retail options.

Comment: The La Cienega/Third Street location is already one of the most retail and service-rich locations in the Los Angeles metropolitan area. In addition to two adjacent shopping centers, it also is close to Beverly Hills downtown; Wilshire Boulevard; Robertson, Third Street, Melrose, and Santa Monica Boulevard pedestrian-oriented commercial corridors; and the Farmers Market and Grove. There is no indication of any need for any additional retail shopping in this area of Los Angeles, unlike many other neighborhoods, which desire additional retail and services. As for services, this location is adjacent to the Cedars-Sinai Hospital and related medical offices. It is also a short distance from Century City, where a full range of personal services are available.

6-2

Bullet #8: Create open space and recreational opportunities.

Comment: We also desire to see more open space and recreational opportunities in this neighborhood, but would like them to be accessible to the public, not only to residents of a secured and guarded luxury high-rise building. In our view, this objective could more easily be achieved through Alternative 2, without any environmentally injurious impacts, zone changes, or General Plan Amendments.

Bullet #9: Minimize environmental impacts.

Comment: While we also welcome building alternatives that minimize impacts on the environment, we have concluded that a much smaller project, one that uses far less building materials and energy, such as Alternative 2, makes far more environmental sense than a 240 foot luxury building that would require substantially more building materials and require more resources, both on and off-site, for its construction and long-term operation.

Section 4.2.3.1: Wilshire Community Plan (pp. 4.2-16, 17)

As of October 2015, the Department of City Planning estimates that the population of the Wilshire Community Plan area is 290,338 people. This contrasts to the actual population of the Wilshire Community Plan of 292,101 in the year 2000, for a net population loss of 2,000 people over the past 15 years. The current estimated population of 290,338 people also contrasts to the Community Plan's forecast population for the year 2010 of 337,124 or 45,000 more people than actual population five years past the Wilshire Community Plan's horizon year. This would also be 47,000 more people than City Planning indicates currently live in the Wilshire Community Plan Area.

The population trends indicate a lack of population gain, so significant that the existing plan designations or zoning is not capable of addressing changes in population and presumed demand for housing. For a General Plan Amendment and Zone Change ordinance to be justified, there should be demonstrable, credible growth in existing and forecast population to the point that the existing zoning and plan designation can no longer keep up with population growth, and therefore must be amended to permit more intensive zone and plan designation. This is not remotely the case in the Wilshire Community Plan area, as well as in this sub-area. 6-3

A careful review of the Community Plan also indicated many policies and goals with which this project is inconsistent and therefore cannot be justified. To nevertheless proceed with these land use ordinances would severely compromise the Community Plan prior to its long overdue update. While highly unlikely, but theoretically possible, the Update, which is supposed to happen before the year 2027 could reveal a sudden unexpected population surge that exceeds zoning capacity. This is highly unlikely. Furthermore, until this information does appear, a General Plan Amendment and Zone Change of the magnitude requested by DEIR Alternative 4 is highly unwarranted. This is why the Beverly Wilshire Homes Association supports either of the environmentally superior alternatives, #1 or #2. 6-4

We also wish to point out the following goals and policies from the plan that further indicate that Alternative 3 and 4 are highly inconsistent with the Wilshire Community Plan. Their approval would jeopardize the integrity of the Wilshire Community Plan planning process and constitute an unmitigatable impact. 6-5

Page II-3 "Preserving and enhancing the positive characteristics of existing uses which provide the foundation for community identity, such as scale, height, bulk, setbacks, and appearance."

Conclusion: A 240 foot, 20 story, streamline moderne luxury high rise building will not preserve and enhance the community identity, scale, and appearance of existing development.

6-5

Page II-5 "Chapter V of the Plan requires a decision maker to make a finding of conformance with the applicable design standards for discretionary projects." *(Conclusion: as demonstrated later in this letter, it is impossible to make these design findings.)*

Page II-6 "...the Framework Element of the General Plan commits the Department of City Planning to develop a monitoring system and prepare an annual report of growth and infrastructure, to be submitted to the City Planning Commission, Mayor, and the City Council. . . In the fifth year following plan adoption (and every five years thereafter), the Director of Planning shall report to the commission on the relationship between population, employment, housing growth, and plan capacities. If growth has occurred faster than projected, a revised environmental impact analysis will be prepared and appropriate change recommended to the community plan..."

6-6

Conclusion: The Department of City Planning has not prepared any monitoring reports for the Wilshire Community Plan. There is no data at all supporting the case that population growth warrants the up-zoning and up-planning required by Alternative 3 and 4. In contrast, the Planning Department has separately provided data that the Wilshire Community Plan area has had population decline overall and that the plan area's current population is about 47,000 people less than forecast for the horizon year of 2010.

Page III-1 "The Wilshire Community Plan has three fundamental premises. **1)** A general limitation on residential densities in various neighborhoods to the prevailing existing density of development within these neighborhoods.

Conclusion: This section of the Wilshire Community Plan area contains predominantly low-rise single family homes, duplexes, and apartments, with several mid-rise residential buildings near the proposed site. There are no other high-rise buildings, as proposed in Alternative 4, in this vicinity.

6-7

2) If monitoring finds that...infrastructure resource capacities are threatened in relation to user need, ...including transportation infrastructure;,...then building controls would be put into effect for the affected portions of the Wilshire Community Plan until land use designations for the Community Plan and the corresponding zoning are revised to more appropriately limit new development."

6-8

Conclusion: Traffic in the areas near 333 La Cienega is heavily gridlocked, especially Third Street and LaCienega, as well as two busy streets not measured in the DEIR intersection analysis: Burton Way and San Vicente Boulevard based on future already entitled projects. As a result, many land use designations and

commercial zones in this area should be held constant or down-planned and down-zoned because of increased traffic congestion despite population decline.

It is stated in the FEIR for the Academy Museum Project under 2.A Topical Responses To Traffic TR-2 Traffic 1. Traffic c Traffic Study Results:
"That with implementation of Transportation Mitigation Measures, unmitigated significant impacts remain at a total of three intersections under Existing with Mitigation conditions and Future with Project with Mitigation (year 2017) conditions, as follows:
13. Fairfax Avenue & 6th Street
23. Fairfax Avenue and Wilshire Boulevard
54. LA Cienega Boulevard/Le Doux Road & San Vicente Boulevard & Burton Way"

6-8

Page III-2, Policy 1-1.1 and 1-1.2 "Protect existing stable single family and low density residential neighborhoods from encroachment by higher density residential uses…that is incompatible as to the scale and character or would otherwise diminish quality of life…neighborhood residential projects must be consistent with the Wilshire Community Plan recommendations."

Conclusion: the Wilshire Community Plan clearly specifies Wilshire Boulevard as the location for high-rise residential buildings, such as the one proposed in Alternative 4. The existing plan designations and zones allow high-rise buildings to be built by-right on the Wilshire Corridor. Furthermore, from 2023 onward the Purple Line Subway Extension will operate on this corridor. In contrast, the 333 LaCienega location requires a zone change and land use designation change. It is also only served by local bus lines and is incompatible in character and scale with surrounding low-rise and mid-rise residential and commercial buildings.

6-9

Page III-4, Policy 1-3.1 "Promote architectural compatibility and landscaping for new Multiple Family residential development to protect the character and scale of existing neighborhoods."

Conclusion: A 240 foot high steamline moderne high rise, luxury residential building is not compatible with existing architecture, as well as the character and scale of existing neighborhoods, in particular the residential neighborhoods to the immediate east of 333 LaCienega.

6-10

Page III-4 Objective 1-4 "Provide affordable housing and increased accessibility to more population segments, especially students, the handicapped, and senior citizens."

Conclusion. This project, Alternative 4, is a luxury high-rise project, which does not offer any housing to students, disabled, and senior citizens unless they can

6-11

afford extremely high rents, approximately ten times the price of affordable housing. 6-11

Page IV-3, Housing Policy 1 " Encourage development of housing senior citizens, the physically challenged, and low-income persons in close proximity to health and community service facilities, retail services, and public transportation."

Conclusion: There is no doubt that 333 LaCienega is located in a commercial area with substantial facilities, especially medical, retail services, and public transportation, especially after 2023, when the Purple Line Subway extension becomes operational, but there is no call in the Community Plan for additional luxury housing in this location, or for a concierge service of on-call luxury cars with drivers. This is essentially in lieu of the special needs, transportation-oriented housing for special needs tenants that the Community Plan promotes. 6-12

Page V-2 Design Goals and Purposes " . . . in Multiple-Family Residential areas, the emphasis is on the promotion of architectural design that enhances the quality of life, living conditions, and neighborhood pride of the residents."

Conclusion: Alternative 4 is not designed to serve the quality of life of local residents, since few if any local residents will move into the proposed project. Rather it is intended to promote the quality of life for a small coterie of international visitors who will be new to the neighborhood when they visit Los Angeles. Other than the accident of location, the building, its staff, and residents will have no relationship to the local community in the vicinity of 333 La Cienega. 6-13

Page V-4 2. Pedestrian-Oriented, Building Height and Design "In Regional Commercial Centers, Community Commercial Centers, Neighborhood Districts, and along Mixed-Use Boulevards, the mass, proportion, and scale of all new building must encourage pedestrian orientation.:

Conclusion: Alternative 4 is an automobile-oriented building in which tenants will be whisked to and from the site in luxury vehicles. In addition, the 240 foot tall tower will soar over existing buildings and the local pedestrian environment. Unlike the existing low and mid-rise structures that are pedestrian oriented in scale, this high-rise tower is in no way pedestrian oriented. 6-14

Page III-32. Goal 14 Discourage Non-Resident Traffic Flow On Residential Local Streets, and Encourage Community Involvement In Determining Neighborhood Traffic And Parking Controls

Policy 14-1.1 "The City Planning Department and LADOT should continue to work closely with the Wilshire Community Plan Area residents to identify existing and anticipated "cut-through" traffic and spillover parking from adjacent commercial areas. Through neighborhood community meetings, 6-15

traffic calming measures and strategies should be developed for effective Residential Neighborhood Plans."

Conclusion: Limited commercial parking at the proposed project will become problematic with spillover parking impacts because of the lack of available vehicle spaces and extremely limited street parking on the perimeter of the project for customers and employees. Cut-through traffic in adjacent residential neighborhoods will also result.

6-15

Page III-33 Goal 15 Provide a Sufficient Supply of Well Designed And Convenient Off-Street Parking Lots And Facilities Throughout The Plan Area

Policy 15-1.1 "Minimize the Number of Ingress And Egress Points To And From All Major Class II and Secondary Highways in the Wilshire Community Plan Area."

Conclusion: Four ingress and egress points into the proposed project on San Vicente Blvd and two ingress and egress points on La Cienega Blvd. are incompatible with the Wilshire Community Plan Policy and will lead to driver distraction leading to traffic delays caused by confused customers approaching the proposed project.

6-16

Page 111-34 Goal 16 Provide a Community-Wide Circulation System of

Freeways, Highways, and Streets which Supports Existing Land Uses and Anticipated Traffic Flow Volumes, While Maintaining Acceptable Levels Of Service At All Intersections

Policy 16-1.1 "Maintain a Satisfactory Level of Service (LOS) above LOS "D"
For Class II Major Highways, especially those which serve Regional Commercial Centers and Community Commercial Centers; and Above LOS "D" for Secondary Highways"

Conclusion: The proposed project is requesting a change of zoning from C2-1VL-O Neighborhood Office Commercial to C2-2-O Regional Center Commercial. That zone change is incompatible with Policy 16-1.1 because of intersections located at La Cienega-Wilshire LOS E, La Cienega-Olympic LOS F in the AM period and Roberston Wilshire LOS E, La Cienega-Wilshire LOS E, and La Cienega-Olympic LOS E in the PM period.

6-17

Comments on Section 5.2, Reasons Why the Project is Being Proposed, Not Withstanding Significant Unavoidable Impacts

This portion of the DEIR makes the case that the DEIR recommends Alternative 4 for the following reasons.

Page 5-2 1. "The project achieves some objectives of the Wilshire Community Plan. "

Conclusion: As shown in our review of multiple sections of the Wilshire Community Plan, this is the wrong project in the wrong location. There is no policy in the Community Plan that calls for a high-rise luxury tower at this location. The Plan does, however, indicate that buildings of this type should be placed on the Wilshire Corridor, where existing land use designation, zoning, and transportation infrastructure are perfectly suitable and do not require any legislative actions by the City Council to legalize this project.

6-18

2. "Provide housing opportunities in an urban setting in close proximity to employment, good, transit, and services."

Conclusion: The housing designated in Alternative 4 is luxury housing, largely for wealthy visitors. It is not primarily for people who already live in and/or work in the area. Furthermore, by providing concierge drivers and luxury cars, the project discourages any of its tenants from becoming transit users.

6-19

3. The only significant impact of this project is short-term construction noise.

Conclusion: We have demonstrated that in the absence of the active monitoring program called for in the Community Plan, it is difficult to know actual demographic, housing, and employment conditions in the Wilshire Community Plan. Other City Planning data, however, reveal measurable population decline between 2000 to 2015, as well as a substantially lower population than the level forecast by the Community Plan for the horizon year of 2010. We have further demonstrated that this project so conflicts with the existing Community Plan's land use policies that it would establish unavoidable and unmitigable conditions on the ground that would hobble the Community Plan when it is eventually updated at an unspecified point between 2016 to 2027.

6-20

"4. The project would develop an under-utilized site with aesthetically pleasing and well designed-mixed use housing and retail development that is distinctive and complementary to the community's character."

Conclusion: Based on the Community Plan's existing plan designation and zoning, Alternative 2 indicates that this site could be redeveloped into other legal, by-right uses without any legislative actions. This belies the claim that the site is

6-21

under-utilized, which only applies to Alternatives 3 and 4, both of which have considerable environmental impacts.
Furthermore, the esthetic claims are also unwarranted because the project does not match the character and scale of the surrounding community. This includes the project's architectural choice of streamlined-moderne, which only matches one adjacent project, also built by the same investor through discretionary actions.

6-21

Comments on Initial Study Wilshire Community Plan Appendix A-1 14 Public Services a. Fire protection? Operation

"The proposed project would include 31,055 sf. of commercial retail uses and 145 residential units in a 240-foot mixed use high rise building. The proposed project would be served by Fire Station No. 61, located at 5821 West 3rd Street. The station has a current response time of approximately five minutes, and is located approximately 1.7 miles west of the project site. This distance is outside of the 1.5 mile maximum response distance from Station 61. Given the distance and the building's height which exceeds the 75 foot threshold, automatic fire suppression sprinklers would be required by the Fire Code."
Comment. Based on the distance from the Fire Station outside of the maximum response distance and only anecdotal response time data acquired by a personal communication with Chief Craig Nielsen, questions of EMS and fire response remain unanswered, especially for a project of this height.

6-22

For the many reasons outlined in this DEIR response, the Beverly Wilshire Homes Association supports Alternative 1 or 2 and opposes Alternative 3 and 4.

Sincerely,

Beverly Wilshire Homes Association

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July 5, 2016

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Department of City Planning City Hall
City of Los Angeles
200 N. Spring Street, Room 750
Los Angeles, CA 90012

VIA EMAIL TO:
alejandro.huerta@lacity.org

Re: *333 La Cienega Boulevard Project (SCH No. 2016011061)*

Dear Mr. Huerta:

This letter is to serve you with comments on behalf of the SoCal Environmental Justice Alliance ("SEJA") regarding the 333 La Cienega Boulevard Project (the "Project"; SCH No. 2016011061) and its Environmental Impact Report (the "EIR").

SEJA believes the EIR is flawed. The City of Los Angeles' environmental review process has failed to ensure environmental, social, and economic justice for the City's residents. Therefore, we believe you should redraft and recirculate the EIR. 7-1

We look forward to your responses. Please forward a notice of availability of the Final EIR to blum@blumcollins.com and collins@blumcollins.com.

I. PROJECT DESCRIPTION

333 S. La Cienega is a 1.15 acre site bounded by La Cienega on the East, San Vicente on the West, Third Street to the North, and Burton Way to the Southwest.

The Project proposes to develop a 1.15-acre site with a mixed-use, up to 20-story building with a total floor area of 294,294 square feet (sf) consisting of 145 residential units and 31,055 sf of commercial uses: a 27,685 sf grocery market and 3,370 sf of restaurant space. The proposed structure would be approximately 240 feet in height and provide a 6:1 floor area ratio (FAR). The Project would include a ground level with 3,923 sf of residential lobby space and 22,436 sf commercial (retail and restaurant) space; a mezzanine level with 8,619 sf of 7-2

commercial (retail and restaurant) uses and 3,516 sf of residential lobby space; 145 residential units (Levels 5 through 19); and one level with amenities such as a pool, gym, spa, and lounge (Level 20). There would be approximately 26,862 sf of usable common and private open space. The Project would provide 362 parking spaces, including 119 parking spaces for commercial uses in a two level subterranean parking garage, 218 parking spaces for residential uses, in an aboveground enclosed garage on Levels 2 through 4, and 25 spaces reserved for use by the mixed-use development at 8500 Burton Way as required by Condition No. 11 in Ordinance 180766.

The Project would require a Vesting Zone and Height District Change from C2-1VL-O (Commercial, Height District 1VL, Oil Drilling District) to C2-2-O, pursuant to LAMC Section 12.32, to change the Height District from 1VL to Height District 2 to allow for the construction of a 240-foot building, and a General Plan Amendment (GPA), pursuant to LAMC Section 11.5.6.A, to change the land use designation from Neighborhood Office Commercial to Regional Center Commercial which would allow for the proposed height, density, and floor area ratio of the new structure. The Project would also require a Site Plan Review, pursuant to LAMC Section 16.05.C.1.b, for construction of a mixed-use development with a maximum of 145 residential units; a Variance, pursuant to LAMC Section 12.27, to allow alternative locations for long-term bicycle parking within the building; a Vesting Tract Map, pursuant to LAMC Section 17.15, for the merger and resubdivision of the project site to create five lots; and a Master Conditional Use Permit to allow onsite and offsite sale of alcoholic beverages in conjunction with a proposed grocery store and full service restaurant.

7-2

II. AIR QUALITY

There are major flaws in the EIR's air quality impact analysis, which the EIR buries in an appendix to an appendix already prepared for the initial study (the Air Quality and Green House Gas Emissions Technical Report, Appendix A to Appendix A-1 of the EIR). This is improper.

7-3

The air quality impact analysis makes a number of unreasonable assumptions:

- The EIR states that grading would occur for 8 days, which is simply not credible given that the EIR states hauling would take 80 days (2,000 truckloads, with a maximum of 25 trucks hauling each day).
- The EIR assumes 0.1 acres of paving instead of 1.15 acres in the GHG analysis; there is no indication that the EIR modeled the GHG emissions from the construction of a concrete building; according to the California Greenhouse Gas Emission Inventory, the manufacture of concrete leads to almost 7% of GHG emissions from industries in California (see Attachment C).

7-4

7-5

- The EIR makes assumptions about the use of air compressors during the demolition phase, but fails to adopt the use of air compressors as a mitigation measure. 7-6
- The EIR fails to disclose how or whether it modeled for impacts relating to (1) the excavation of at least 19 feet of soil; and (2) the demolition of the building and existing parking structure. 7-7
- The EIR understates fugitive dust emissions, because it improperly assumes that the Project will "replace ground cover" when that is not possible on a site with no plants. 7-8
- Under operational assumptions, the EIR relies on speculations of trip generation that are not supported by substantial evidence. The EIR assumes that there will be a total of 81.31 trips per thousand square feet of restaurant space on a Saturday. This is too low. According to the Institute of Traffic Engineers' Trip Generation Manual (9th Edition), the daily trip generation rate for a "Quality Restaurant" is 89.95. For "High Turnover Sitdown Restaurants" (which is how the EIR characterizes the Project's proposed restaurant), the daily trip generation rate is 127.15 according to the Trip Generation Manual (8th Edition). The EIR states that the trip generation rate for its proposed supermarket is 49.56 when the Trip Generation Manual (8th Edition) says that it should be 102.24. The EIR also states that the trip generation rate for the proposed apartments is 5.65 per unit when the Trip Generation Manual (8th Edition) says it is 6.65 per unit. 7-9
- The EIR inexplicably assumes that 130.5 of 145 units will have fireplaces. The numbers appear to be manipulated to generate an operational value that is below the South Coast Air Quality Management District's advisory threshold of 3,000 MTCO2e. 7-10
- The EIR assumes 40% reduction in pass by trips relating to supermarket use, 15% reduction of trips for transit and walking for apartment uses, and 10% reduction in pass by trips for the restaurant use. These assumptions are not supported by substantial evidence. 7-11
- The EIR modeled the Project's emissions based on the assumption that the Project would only use US EPA Tier 4 equipment during the demolition phase. The EIR calls this a "Project Design Feature," but avoids making this an enforceable mitigation measure. Mitigation measures must be "fully enforceable" and should not be deferred to or lie within the discretion of the project applicant. CEQA Guidelines, § 15126.4(a)(2); see *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 306. 7-12

The EIR also failed to properly assess cumulative impacts, claiming that they are not significant. The EIR's approach is contrary to the very definition of what a cumulative impact is. Public Resources Code § 20183(b)(2) defines cumulative impacts to mean "that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the 7-13

effects of other current projects, and the effects of probable future projects." In other words, inherent in a cumulative impacts analysis is whether an impact is significant when combined with the effects of other past, present, and future projects. This is borne out by the Guidelines. Guidelines § 15130(a)(1) provides "As defined in Section 15355, a cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts." Guidelines § 15064(h)(1) provides:

> When assessing whether a cumulative effect requires an EIR, the lead agency shall consider whether the cumulative impact is significant and whether the effects of the project are cumulatively considerable. An EIR must be prepared if the cumulative impact may be significant and the project's incremental effect, though individually limited, is cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects. Guidelines § 15064(h)(1) (emphasis supplied).

Guidelines § 15065(a)(3) requires a mandatory finding of significance when "[t]he project has possible environmental effects that are individually limited but cumulatively considerable," and provides the same definition of "cumulatively considerable." 7-13

Finally, Guidelines § 15355 defines cumulative impacts and states:

> "Cumulative impacts" refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.
> (a) The individual effects may be changes resulting from a single project or a number of separate projects.
> (b) The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

Guidelines § 15355 (emphasis supplied). See also Gordon & Herson, "Demystifying CEQA's Cumulative Impact Analysis Requirements: Guidance for Defensible EIR Evaluation," Cal. Env't'l L. Reporter, 379, 381 (Sept. 2011) (Vol. 2011, Issue 9) ("Critically, a proposed project's incremental effects may be "cumulatively considerable" even when its individual effects are limited.

(citations). In other words, CEQA does not excuse an EIR from evaluating cumulative impacts simply because the project-specific analysis determined its impacts would be 'less than significant.'" In short, the EIR's cumulative impacts analysis is wholly without a basis in substantial evidence and represents a failure to proceed by law. 7-13

III. PALEONTOLOGICAL RESOURCES

The project applicant acknowledged in its Initial Study – but not in the EIR – that "[t]he nearest vertebrate fossil locality from the older Quaternary deposits is LACM 7672, which is either located within the northwest portion of the project site or immediately adjacent to it, near the intersection of Third Street and San Vicente Boulevard." Initial Study at B-29. This is a significant impact. The Initial Study went on to list a number of other finds in the vicinity. The Initial Study disclosed that "[n]umerous fossil Pleistocene (approximately 2.6 million years ago – 11,000 years ago) localities have been documented within LA County from deposits similar to those underlying the project site," and that therefore "the project site should be considered highly sensitive for presence of paleontological resources." The project applicant asserts that Mitigation Measures CUL-2 through CUL-4 would make impacts less than significant. But CUL-4 provides only that if there is a find, work within 50 feet of the find will cease. The mitigation measure should instead provide that a paleontologist should have the authority to determine the extent to which work shall cease. Further, discussions of paleontological resources and relevant mitigation measures should be in the EIR as opposed to only in the Initial Study. 7-14

IV. GEOLOGY AND SOILS

The Initial Study states that the Project Site is located in an area considered to have high potential for liquefaction per the LA General Plan Safety Element, and also per the California Geological Survey. However, the EIR does not elaborate and it appears no geotechnical investigation has been done. While the project applicant's "geotechnical investigator" claims that prior investigations for the project site indicated that the liquefaction potential is "low", the EIR does not provide substantial evidence to support this claim. 7-15

V. HAZARDS AND HAZARDOUS MATERIALS

The Project's Phase I ESA disclosed that (1) the existing site contains LBPs (Lead Based Paints); (2) the soils had Total Recoverable Petroleum Hydrocarbons up to 4,900 mg/kg; and (3) the Project site is located in a Los Angeles Department of Building and Safety designated Methane Zone, and sampling disclosed over 1,000 ppmv for at least one sample taken. 7-16

The EIR does not provide adequate information with which to analyze items (2) and (3). The information referenced above was taken from the Initial Study not the EIR. 7-16

The Initial Study claimed significant impacts would be addressed through Mitigation Measures HAZ-2 through -6. They are inadequate for the following reasons:

- MM HAZ-2 would require monitoring of airborne lead at the project site to protect workers; if the monitoring shows less than 30 micrograms/m3 as an 8-hour time weighted average, the City would require the developer to hire a LBP abatement contractor. This is inadequate. The mitigation measure does not say when or how often monitoring would be conducted. It also says nothing about impacts on neighboring residents. Further, a LBP abatement contractor should be mandatory, not optional, in this dense urban environment. 7-17
- MM HAZ-4 calls for a Soil and Groundwater Management Plan. However, the EIR fails to specify any details about the plan, i.e., how or where the project applicant intends to dispose of contaminated soils. 7-18
- MM HAZ-6 provides for a Methane Control System including a gas detection and vent system and independent analysis by a qualified engineer to retard potential methane seepage into the building. This analysis by the qualified engineer should have been done already and included with the EIR; but it's not. The EIR also fails to provide any specifics about the gas detection system in compliance with LAMC § 91.7102. 7-19

VI. HYDROLOGY AND WATER QUALITY

The Initial Study concedes impacts to the groundwater level may result from implementation of the Project by direct withdrawal or through interruption of an aquifer through excavation. The Initial Study claimed that mitigation measures HYD-1 through HYD-3 will reduce the impacts.

HYD-2 provides for a groundwater hydrology report if permanent dewatering or temporary dewatering will be required, to assess the approximate drawdown the dewatering will cause and to disclose its spatial limits. The EIR fails to discuss this significant impact. 7-20

HYD-3 provides for a Report of Waste Discharge to the Los Angeles Regional Water Quality Control Board to determine what permit for discharge will be required, either to surface water or groundwater. This report should have been completed and included with the EIR – it's not. 7-21

The EIR also fails to address cumulative impacts from any other projects in the vicinity that are also building subterranean parking structures and impacting the groundwater level. 7-22

VII. PUBLIC SERVICES

As to police services, the EIR asserts that impacts will be less than significant based on nothing more than a personal communication with a police officer. The EIR should have assessed the present ratio of residents to officers and how the Project and other cumulative projects will affect that ratio. The EIR also should have discussed the effect on average police response time in the area. Attachment E provides a more appropriate framework for the analysis of police services (taken from the Landmarks Apartments DEIR). 7-23

As to parks, the project applicant cannot rely on the payment of Quimby Fees as mitigation. The EIR also includes this unintelligible sentence that needs to be clarified: "To accommodate the recreational needs of the new residents, the proposed project would provide approximately 26,862 sf of open space, which exceeds the City's required open space of 19,750 sf by approximately 1,528 sf." 7-24

VIII. TRANSPORTATION AND TRAFFIC

The EIR's air quality impact analysis depends on its traffic analysis, which is also deficient. 7-25

The EIR says the City's residential parking policy requires that the applicant designate 2 spaces per unit plus 0.25 spaces for non-parking congested areas or 0.5 spaces for congested areas or condos. However, the EIR doesn't say whether the Project is being planned as a condo development or whether the Project is in a "parking congested area." 7-26

The EIR says that its calculations are reduced by 5% for "internal trip reductions" for the supermarket and restaurant uses, and that trips for all uses are reduced by 15% for transit and walk trips. This is improper double counting. The EIR also takes a 10% pass-by adjustment for the restaurant use and a 40% pass-by adjustment for the supermarket use. The EIR alternatively refers to this space as retail or supermarket. However, the 40% reduction is inappropriate for any use other than a supermarket use. Thus, the EIR needs to specify unequivocally whether the space is being used for a supermarket. 7-27

The EIR takes "credit" for the former use as a Loehmann's Department Store even though the building has been vacant for 1.5 years. In other words, the EIR is stuffing non-existent traffic into their "baseline" for traffic analysis as well as for air quality modeling. This is improper. The project applicant is relying on the 7-28

case of *North County Advocates v. City of Carlsbad* (2015) 241 Cal. App. 4th 94 to justify its use of hypothetical traffic counts.

There are at least three problems with this approach. First, the *North County* case was wrongly decided and contrary to the California Supreme Court's precedent in *Communities for a Better Environment v. South Coast Air Quality Management District* (2010) 48 Cal. 4th 310 ("CBE"). In CBE, the California Supreme Court rejected the South Coast Air Quality Management District's use of a hypothetical baseline of the air emissions that were permitted versus those that had actually been emitted from a refinery. The refinery at issue in that case, ConocoPhillips, argued that it had vested rights to emit at the levels in its permits; the Supreme Court disagreed, but wrote:

> Even if environmental review were to indicate that the project's adverse effects could be mitigated only by a condition requiring ConocoPhillips to reduce or limit its use of an individual boiler below the previously permitted level, but ConocoPhillips's vested rights precluded imposition of that condition, CEQA would still demand an analysis of the project's true effects. That a particular mitigation measure may be infeasible or precluded, as by the applicant's vested rights, is not a justification for not performing environmental review; it does not excuse the agency from following the dictates of CEQA and realistically analyzing the project's effects. 48 Cal. 4th at 324-325.

7-28

Second, this case is distinguishable from the *North County* case. Unlike here, the *North County* applicant was proposing to develop the department store in question according to its past use. In contrast, here, the proposed Project case is not a department store consistent with past use; it is a massive apartment building with associated retail uses.

Third, the applicant in *North County* was using only hypothetical traffic counts. Here, by contrast, the project applicant has actual traffic counts, but it is attempting to supplement the actual counts with hypothetical counts. This is inappropriate. The actual counts, and nothing else, should have informed the air quality, traffic, and noise analyses.

In the EIR's Traffic discussion, under "Future with Project Evaluation Procedures," the EIR indicates that it added 1% growth for each year for two years. But the baseline was 2014 to which the project applicant had added 1%, and it was calculating for 2019, which means the EIR is missing two percent – from 2015 to 2017. See pages 4.4-15 to -16, and see 4.4-15 (Existing Intersection Conditions).

7-29

At 4.4-16 under Regional Public Transit System, the EIR indicates that the estimated base vehicle trips were multiplied by 1.4 for person trips and then multiplied by the number of persons expected to take transit. The EIR says that "these numbers are higher in some cases than the default countywide guidelines in the Congestion Management Program and therefore more conservative in this instance as they reflect the higher transit use that would occur for the project." Since the EIR is assuming this transit use would replace cars on the road, we believe this analysis is actually the opposite of conservative. 7-30

At 4.4-24 the EIR indicates that there will be road closures: the project applicant expects to close down the parking lane and bicycle lane along San Vicente during the entire construction period (approximately 24 months). The EIR further states that "[d]uring the demolition and excavation phase (approximately four months) the project would likely need to close one southbound traffic lane on La Cienega Blvd." On the immediately preceding page, and elsewhere, the EIR acknowledges that the demolition and excavation phases should last 6 month (which is understated, as discussed elsewhere in this letter). This creates a significant impact because La Cienega Blvd. is designated by Los Angeles County as a Disaster Route. While the project applicant relies on Project Design Feature 4.4-1, a Construction Traffic Mitigation Plan, to reduce impacts, the Plan has yet to be developed or approved. 7-31

The project applicant needs to haul 25,000 cubic yards of material from demolition. It has assumed it can load 14 cubic yards of material per truck. It fails to acknowledge that state law requires it to maintain 1 foot of freeboard with each truck to prevent dust. This means that the project applicant could carry at most 9 cubic yards per truck. Moreover, the project applicant has committed to use only "small trucks" to reduce vibration, so even 9 cubic yards is an overestimate. Nevertheless, using the 9 cubic yard estimate, that would mean 2,778 truckloads for demolition, and approximately 3 months for hauling Demolition Phase material, which is the EIR estimated. However, for the Excavation Phase, the project applicant estimates 28,000 cubic yards of material or 3111 truckloads, divided by 25 trucks a day (project applicant's estimate), yields 124 days and for 6 days a week this is 4.8 months. Therefore, the EIR should be assuming 8 months for demolition and excavation, not 6 or 4 months. 7-32

The CTMP should have been developed and disclosed to the public as part of the CEQA process. There are no assurances that the project applicant's "disaster detour plan" will work.

Disaster Routes, according to LA County, are used to transport emergency equipment, supplies and personnel into an affected area. See Attachment A. Therefore, both sides of La Cienega need to remain open for it to function effectively as a disaster route (the issue is not merely access to Cedars Sinai). See 7-33

Attachment B. Also, impacts are to be reported to the County, and this is not provided for in the "Project Design Feature." 7-33

Regarding Construction Impacts to Traffic, the EIR indicates that the project applicant is using a Passenger Car Equivalent value of 2.0 for their haul trucks. But the EIR elsewhere indicates that the project applicant expects to remove 14 cubic yards of material with each truckload, which would likely require a 4- or 5-axle truck. Thus the assumption of a 2.0 PCE is not based on substantial evidence. See Attachment D, Passenger Car Equivalents for Heavy Vehicles in Work Zones. The PCE should be 2.5 or 3.0. Thus, when the EIR says the project applicant will remove 36 truckloads of material during the Demolition Phase, meaning 72 trips, or a PCE of 144, the PCE should be at least 180 or 216. With respect to excavation and grading, the PCE is not 100, but more like 150 or 186. 7-34

As to the Construction Phase itself, the EIR now anticipates an average vehicle occupancy of 1.4. This is inconsistent with the project applicant's earlier, more credible ratio of 1.135 persons/car. 7-35

The EIR states that "Parking for construction workers would initially be provided offsite, as specified by the CTMP. The locations have not yet been determined but they would be in commercial areas." It is highly unlikely that they will find this much parking. They rely on Pub. Resources Code section 21099 to the effect that they do not have to find parking impacts to be significant for residential projects in transit priority areas, but it is not clear that the Legislature intended to exempt construction parking impacts. In fact, § 21099(e) provides "This section does not affect the authority of a public agency to establish or adopt thresholds of significance that are more protective of the environment." The LA CEQA Thresholds Guide provides for a more protective threshold as to construction parking. Note also the EIR concedes that the Project would lead to the closure of 9 parking spaces, presumably along San Vicente, for the duration of construction. See EIR at 4.4-34. 7-36

Under 4.4.4, Cumulative Impacts, the EIR acknowledges that construction workers from the Project and cumulative projects would be leaving the area during the PM peak hour, but the EIR does not analyze the significance of this impact with any quantitative reasoning. It also concedes there is potential for Project haul routes to overlap with other project haul routes, "particularly with respect to other projects located along La Cienega Boulevard," of which there are at least three. Looking at the project map, there are a number of projects which would likely designate La Cienega south to the 10 as their haul route, exacerbating limitations on its use as a Disaster Route (not to mention its use as a traffic corridor). 7-37

IX. LAND USE AND PLANNING

Under the LA CEQA Thresholds Guide the standards are "whether the proposal is inconsistent with the adopted land use/density designation in the Community Plan," and "whether the proposal is inconsistent with the General Plan."

The answer is yes, even though the project applicant claims the answer is no. The EIR acknowledges that the development would require a GPA to change land use designation from Neighborhood Office Commercial to Regional Center Commercial, and a Vesting Zone Change from C2-1VL-O to C2-2-O. The EIR claims that the Project is "generally consistent" with the GP Framework Land Use chapter, but the Project is increasing density all over the City in violation of existing zoning and General Plan provisions. 7-38

The EIR asserts that the Project is "compatible" with neighboring uses even though it would be 20 stories when the adjacent Beverly Center-Cedars Sinai Regional Center have heights between 2 and 10 stories, and 8500 Burton Way to the South is 8 stories, and the Westbury Terrace condominium complex is 12 stories to the West. Thus, the project applicant's assertions are simply not based on substantial evidence. The EIR cites the Four Seasons Hotel on S. Doheny Drive as an example of why the building is compatible with its surroundings, since the Four Seasons is 16 stories, but it is 1.5 miles driving distance (16 blocks) away. 7-39

At 4.2-14 the EIR asserts the building would have a FAR of 3:1. This is false. The Project would have (as acknowledged elsewhere in the EIR, e.g., at 4.2-16) a FAR of 6:1. 7-40

At 4.2-18 the EIR claims that the Project "would be compliant with the uses allowed under the C2-2-O zoning. Upon approval of this zoning . . . the proposed project would be consistent with" the Los Angeles Municipal Code, and therefore "impacts would be less than significant." But the EIR should be evaluating the Project against existing zoning, with which it is not consistent. 7-41

At 4.2-20 the EIR provides Table 4.2-1, Consistency with Local Land Use Plans. Relating to the General Plan Framework Element Policy 3.9-6, "Require that commercial and mixed-use buildings located adjacent to residential zones be designed and limited in height and scale to provide a transition with these uses where appropriate." The Project is not consistent with this policy. The EIR also says the Project is consistent with Policy 3.10.1, "Accommodate land uses that serve a regional market in areas designated as Regional Center." It is not. The Project is on a site that is not designated Regional Center but for the GPA. The EIR also fails to acknowledge that the Project is inconsistent with the following provisions of the Wilshire Community Plan: 7-42 7-43

Objective 1-4: "Provide affordable housing and increased accessibility to more population segments, especially students, the handicapped and senior citizens."
Objective 4-4: "Expand and improve Neighborhood, Community and Regional Parks, and Recreation Centers and Senior Citizen Centers, throughout the Wilshire Community Plan on an accelerated basis, as funds and land become available." (The EIR asserts that the developer is paying Quimby Fees and this mitigates the Project's impact, but the City is woefully behind on developing parks, and there is no demonstration that the fees paid will therefore mitigate the Project's impact).
Policy 4.4-1: "Develop new Neighborhood and Community Parks to help offset the Wilshire Community's parkland deficit for both its current population and for the projected year 2020 population." 7-43

At 4.2-27 the EIR asserts that the Project is consistent with the SCAQMD Air Quality Management Plan, because the project applicant contends that "projects that are consistent with the regional population, housing and employment forecasts identified by SCAG are considered to be consistent with the AQMP growth projections." Wrong. SCAQMD's CEQA Handbook requires analysis of consistency with the City's General Plan. As acknowledged by the EIR, the Project is not consistent with the General Plan, which is why it needs a GPA. 7-44

Regarding cumulative impacts the EIR refers to the two projects closest to the Project site but fails to identify how many of the 53 projects specified are providing for increased density and GPAs to accommodate that increased density. Nor do they address the overall trend throughout the City in this regard. 7-45

X. NOISE

Table 4.3-11 of the EIR provides the Estimated Construction Noise Levels at Offsite Sensitive Uses. The EIR concludes that there would be a 14.6 dBA Leq increase at Westbury Terrace Condominium Tower, 14.4 at the adjacent church, 6.7 at the mixed use residential/retail building south of the Project site across San Vicente and Burton Way, and 6.0 at the multi-family residential buildings to the southwest at San Vicente and Burton Way. These all exceed the LA CEQA Threshold of 5 dBA for a noise sensitive use for construction lasting more than 10 days in a 3 month period and two of them exceed the LA CEQA Threshold of 10 dBA for construction lasting more than a day. 7-46

At 4.3-33 the EIR asserts that a series of mitigation measures effectively requiring compliance with the LAMC would reduce noise impacts to a less than significant level. This is done by analyzing impacts relative to the requirements in the LAMC and not the LA CEQA Thresholds. The EIR's conclusion is not

based on substantial evidence. While the EIR concedes at 4.3-37 with respect to Impact 4.3-3 that the Project would result in a substantial temporary or periodic noise increase, it fails to acknowledge that the impacts under Impacts 4.3-1 and 4.3-3 would be significant. 7-46

Regarding Impact 4.3-2 (exposure to or generation of excessive ground-borne vibration or ground-borne noise levels), Table 4.3-15 concedes that the vibration levels at the retail uses directly adjacent to the Project site would exceed Caltrans and FTA Vibration Damage Potential thresholds. The threshold is 0.5; vibration at the retail use would be 0.995. The EIR claims that this impact would be reduced to less than significant levels through Mitigation Measure 4.3-8, which requires the project applicant to use "small" bulldozers and loaded trucks. But this directly contradicts the EIR's assumptions regarding the number of trips it will take to remove demolition debris and excavated soils from the Project site. The EIR assumes that debris and soils would be removed at the rate of 14 cubic yards per truck in order to complete the removal within 6 months. However, this is impossible to accomplish using "small" trucks. Thus, the project applicant needs to redo its traffic and air quality assessments. It should also reconsider its conclusion that the closure of a lane on La Cienega for a minimum of 8 months will not have significant impact. 7-47

XI. PROJECT ALTERNATIVES

The EIR only analyzes three alternatives: the No Project Alternative, the Existing Zoning Alternative which allows development on the same site in accordance with the existing Wilshire Community Plan and requires a FAR of 1.5 to 1 as opposed to 6 to 1, and a Reduce Density Alternative which allows the development of a 8 story building on the same site. The EIR fails to analyze any alternative that is based on a different site. This violates CEQA's requirement that the EIR analyzes a reasonable range of alternatives. 7-48

XII. OTHER CEQA CONSIDERATIONS

The EIR asserts that "[t]he proposed project would be designed to meet certain LEED standards through the incorporation of green building techniques and other sustainability features," but it doesn't specify the LEED standards. The EIR then lists several "features" that the project applicant claims the building will have. However, none of these "features" are verifiable improvements, let alone enforceable mitigation measures. The EIR says that the building will have energy efficiency "above that required by Title 24," but it does not specify by how much or how the project applicant intends to achieve this. The EIR says that there will be construction and demolition waste recycling, but this is mandated by state law, and does not qualify as mitigation. The EIR says that there will be bicycle 7-49

storage, but the project applicant is relying on this to reduce the number of parking spaces it has to provide in complying with applicable City ordinances. Lastly, the EIR claims there will be "Energy Star" rated residential appliances but doesn't specify what appliances or which level of compliance. 7-49

As to Section 5.4, Growth Inducing Impacts, the EIR says only that the Project's population would represent 0.39 percent of the 2010 population growth forecast. However, the EIR fails to address the impacts of increased density throughout the City from this and other projects obtaining GPAs. 7-50

Sincerely,

Gary Ho

BLUM | COLLINS LLP

ATTACHMENT A

Attachment A

ROAD CLOSURE/DAMAGE REPORTING

Disaster Routes play a primary role in disaster response and recovery. During a disaster and immediately following, Disaster Routes are used to transport emergency equipment, supplies and personnel into an affected area. Disaster Routes are also utilized by fire, emergency medical services and others involved with public safety for life saving measures. Knowing the status of the routes benefits all jurisdictions in the Operational Area by saving valuable time and minimizing last minute rerouting. Each jurisdiction is responsible for reporting road closures and road damages in their area. Disaster routes have priority for clearing, repairing and restoration over all other roads.

The County's Emergency Management Information System (EMIS) is the primary and preferred method of reporting road closure and road damage. EMIS allows for quick reporting and sharing of information.

NOTE: If the County's Emergency Management Information System (EMIS) is not available, road closure or road damage should be reported to the Sheriff Watch Commander or Sheriff Station-Emergency Operations Center (if activated) at the Sheriff Station serving the area. Road closure and road damage can also be reported to the Los Angeles County Department of Public Works by calling (800) 456-HELP (4357).

To report road closure or road damage in EMIS, first log onto EMIS then perform the following steps:

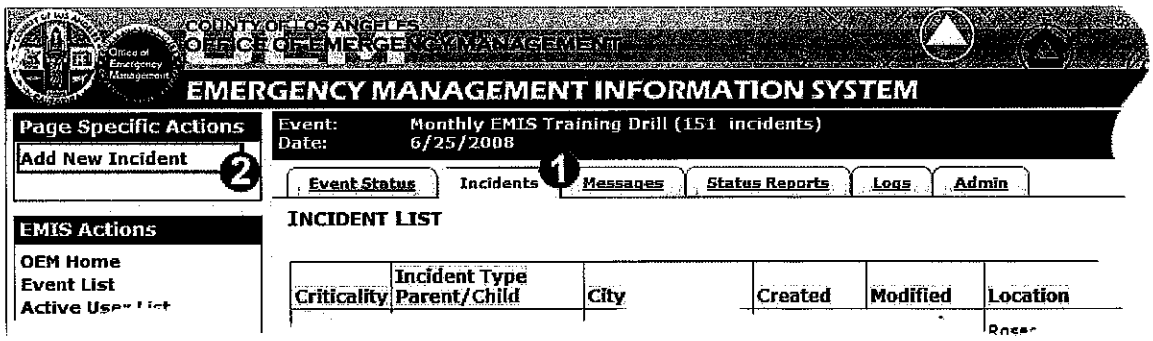

Figure 1

1. Click the *Incidents* tab (see fig. 1)

2. When in Incidents, click *Add New Incident* (see fig. 1)

(Continued on page 2)

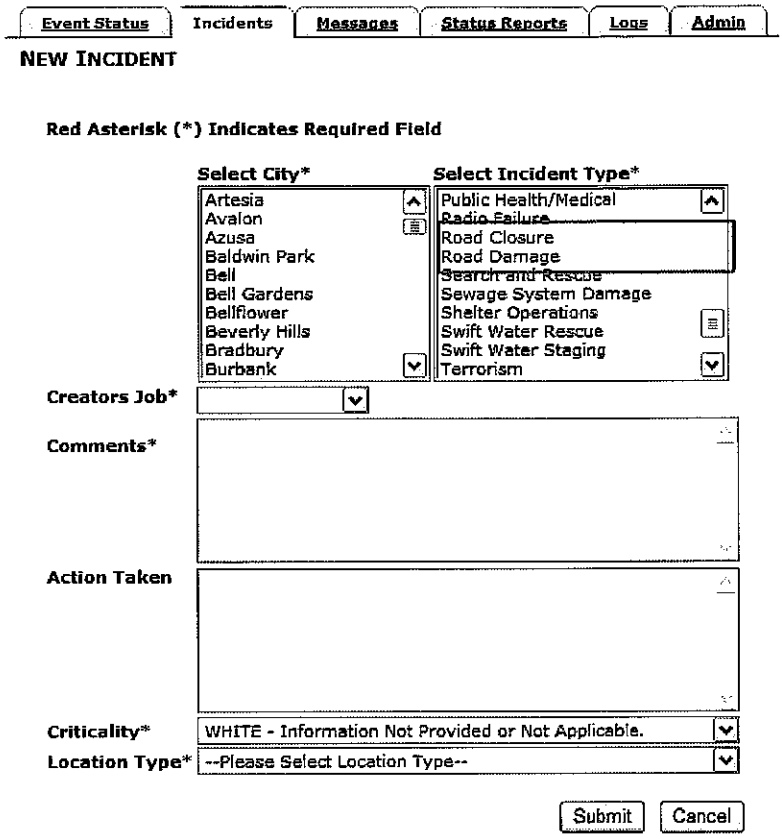

Figure 2

3. Under *Select Incident Type*, select either Road Closure or Road Damage as appropriate (see fig. 2)

4. Under *Comments*, include the street name of the affected street, the street limits (to street/from street), whether or not the street is a Disaster Route, reason for closure or type of damage and estimated reopening dates (if known).

   Example: N. Eastern Ave closed between Woolwine Dr and Rosilyn Dr due to a ruptured water pipe. All lanes closed. This portion of N. Eastern Ave is not a disaster route. No estimated reopening date is available at this time.

5. Fill in the other requested information then click the *Submit* button (see fig. 2)

If you need an EMIS account or EMIS training, please contact your DMAC.

ATTACHMENT B

Attachment B

City Boundary
Freeway Disaster Route
Disaster Route
Thomas Guide Page Grid

CITY OF BEVERLY HILLS

(Map Size: 8.5" x 11")

Comment Letter 7

GIS SERVICES

FEET 2400

0 MILES 0.455

ATTACHMENT C

California Environmental Protection Agency

Air Resources Board

2014 Edition

California Greenhouse Gas Emission Inventory: 2000-2012

May, 2014

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Summary

This report presents an overview of the 2014 Edition of the California greenhouse gas (GHG) emission inventory, which tracks emissions and trends from 2000 through 2012. As California strives to achieve its benchmark goals under AB 32, the California inventory is an increasingly valuable tool to keep track of greenhouse gas emissions from each sector. Maintaining and updating greenhouse gas inventory methodologies and data are imperative for a successful greenhouse gas reduction program.

In 2012, total California greenhouse gas emissions were 459 million metric tons (or tonnes) of carbon dioxide equivalent ($MMTCO_2e$). This represents a 1.7 percent increase in total GHG emissions from 2011 and the first emissions increase since 2007. This increase was driven primarily by strong economic growth in the state, the unexpected closure of the San Onofre Nuclear Generating Station (SONGS), and drought conditions that limited in-state hydropower generation. Since 2000, GHG emissions have decreased by 1.6 percent (from 466 to 459 $MMTCO_2e$) after reaching a peak of 493 $MMTCO_2e$ in 2004.

Emissions in this report are aggregated based on an Economic Sector categorization. In 2012, the transportation sector is the largest source of emissions, accounting for approximately 37 percent of the total emissions. On-road vehicles accounted for more than 90 percent of emissions in the transportation sector. Transportation related GHG emissions have dropped 11 percent since 2006. The industrial sector accounted for approximately 22 percent of the total emissions. Emissions from electricity generation were about 21 percent of total emissions, with higher contribution from in-state than from imported electricity.

Per capita emissions in California have decreased by 12 percent from 2000 to 2012, in spite of the overall 11.4 percent increase in population during the same period. Per capita emissions from in-state electricity generation have declined by 22 percent from 2000 to 2012.

From a broader geographical perspective, California ranks second in the United States in total greenhouse gas emissions; Texas remains as the #1 GHG emitting state. However, from a per capita and per GDP standpoint, California has the 45th and 46th lowest emissions respectively. On an international scale, California has the 20th largest greenhouse gas emissions and the 38th largest per capita emissions for year 2010.

The 2014 edition GHG inventory represents a transition to global warming potentials (GWPs) in the IPCC 4th Assessment Report (AR4). Previous GHG inventories relied on GWPs from IPCC's Second Assessment Report (SAR).

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Tables

Figures

I. Background

A major challenge of today's world is to meet the energy needs of the growing population while protecting the earth and its climate. Governments and organizations at national as well as regional levels have started to take necessary actions to reduce greenhouse gases (AB 32, 2006; United Nations, 2012). The generation of a consistently updated emission inventory with an emission baseline year to monitor the progress of greenhouse gas sources and reductions is vital to these efforts.

The California Legislature and Governor took significant steps to address the concerns raised about climate change with the passage and signing of the Assembly Bill (AB) 32, the Global Warming Solutions Act of 2006 (AB 32, 2006). The California Air Resources Board (ARB) was designated as the lead implementation agency of this landmark legislation. AB 32 set a target to reduce California greenhouse gas emissions to 1990 levels by year 2020. In addition, the Governor signed Executive Order S-3-05 to further require California to reduce greenhouse gas emissions by 80 percent below the 1990 levels by year 2050 (EO, 2005). Parallel to these actions, the California Legislature passed and the Governor signed AB 1803, making the ARB responsible for developing the GHG emission inventory.

Parallel to these actions in 2006, the California Legislature passed and the Governor signed AB 1803 making the ARB responsible to prepare, adopt, and update an inventory of greenhouse gas emissions from all sources located in the state.

The California greenhouse gas emission inventory serves as a foundation for the State's emission reduction goals. ARB regularly updates California's greenhouse gas inventory on its Greenhouse Gas Emission Inventory website (http://www.arb.ca.gov/cc/inventory/inventory.htm). The first set of inventory data covering statewide greenhouse gas emissions and sinks from 1990 through 2004 was published in 2007. In addition, ARB also published a staff report titled "*California 1990 Greenhouse Gas Emissions Level and 2020 Emissions Limit*" that discusses the determination of the 1990 statewide emissions level and provides a summary of the methodologies and main sources of data used to calculate the greenhouse gas emissions (CARB, 2007). These past reports and other inventory related documents are available from ARB's California Greenhouse Gas Emission Inventory website http://www.arb.ca.gov/cc/inventory/inventory.htm.

The 2014 edition of the inventory compiles statewide anthropogenic greenhouse gas emissions from 2000 through 2012. This document presents

a summary of the 2000 to 2012 emissions data, and discusses the statewide greenhouse gas emission trends and relative contributions of emission sources to the total emissions. It is important to note that ARB has updated the estimates of emissions for the full 2000 to 2012 time series, to reflect the latest estimation data and methodologies. This is consistent with the Intergovernmental Panel on Climate Change (IPCC) *Good Practice Guidance and Uncertainty Management in National Greenhouse Gas Inventories* (IPCC, 2000), which states that "It is good practice to recalculate historic emissions when methods are changed or refined, when new source categories are included in the national inventory, or when errors in the estimates are identified and corrected." A comprehensive technical support document detailing the data sources and methods used to develop the 2000 to 2012 inventory is available on the ARB website (CARB, 2014). A technical support document detailing the data sources and methods used to develop the 2000 to 2012 inventory is also available

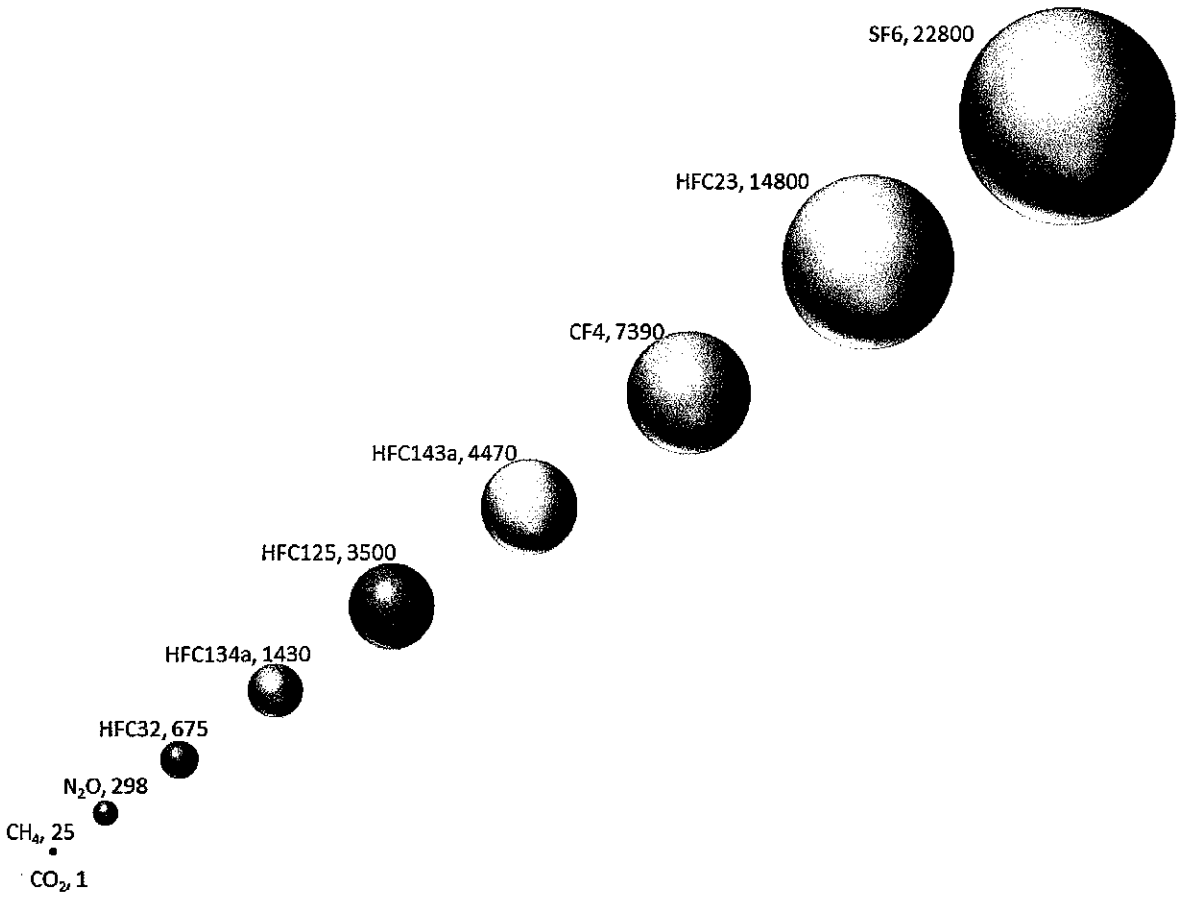
II. Overview of Climate Change and Greenhouse Gases

Emissions of carbon dioxide (CO_2) have increased greatly following the industrial revolution from combustion of fossil fuels, and later from the production of synthetic greenhouse gases such as chlorofluorocarbons (CFCs), hydrofluorocarbons (HFCs), perflurocarbons (PFCs) and sulfur hexafluoride (SF_6). In the past years, numerous scientific studies have shown that the enhanced greenhouse effect causes climatic shifts that will have an adverse effect on human survival (Meehl et al., 2005; Patz et al., 2005; Dettinger and Cayan, 1995). An emission inventory that identifies and quantifies the sources and sinks of these greenhouse gases is essential for addressing climate change.

A. Greenhouse Gases

The Kyoto Protocol identifies the following six gases for emission reduction targets: CO2, methane (CH4), nitrous oxide (N2O), HFCs, PFCs and SF6. Each GHG has a global warming potential (GWP) value, calculated to reflect the relative climate forcing of a kilogram of emissions and how long emissions remain in the atmosphere. The global warming potential allows for a comparison of the warming influence of different greenhouse gases relative to CO2 and provides a single consistent emission unit (IPCC, 2007). For example, it would take 22,800 CO2 molecules to have same effect as one SF6 molecule. This is because SF6 absorbs infrared radiation in a different energy range and has a longer lifetime in the atmosphere than CO2. Thus, small amounts of high GWP gases have a large effect on global warming. GWPs from IPCC's Fourth Assessment Report for greenhouse gases defined in AB 32 are shown in Figure 1.

Figure 1. Global Warming Potentials of Greenhouse Gases



Source: IPCC Fourth Assessment Report

B. Anthropogenic and Natural Emissions

The California GHG inventory is primarily focused on anthropogenic emissions. Anthropogenic emissions directly result from human activities or from human influence on natural and other processes subject to human control (U.S.EPA, 2008). Increases in anthropogenic emissions from pre-industrial times have substantially increased atmospheric greenhouse gas concentrations.

Natural CO_2 emissions are emitted as part of the biogeochemical cycling of carbon and tend to average out over time even though emissions may be significant (IPCC, 2006). For quantification of greenhouse gas fluxes on forest, range, and other natural lands, ARB is updating the methodology under a research contract with UC Berkeley initiated in late 2011. The new quantification procedures under development integrate regularly updated

federal and state ground-based data with geospatial and remotely sensed data and models. Forest and natural lands are not included in the 2014 edition of the inventory while ARB continues to update the methodology.

III. California Greenhouse Gas Emission Inventory

The California greenhouse gas emission inventory serves as the foundation for the State's greenhouse gas emission reduction program. The inventory is a living repository of detailed methodologies for estimating greenhouse gas emissions. The inventory is also a time series of emissions, thus providing a platform to compare the relative contribution of different emission sources and gases to climate change over time.

There are two main types of inventory approaches used to determine the amount of greenhouse gas emissions from a region: the top-down and bottom-up approach (CLIISE, 2007). The California GHG inventory uses both approaches. The top-down approach utilizes nationwide or statewide data, while the bottom-up approach uses facility-specific data to estimate emissions from each source. The total number of emissions from each source are then summed together to generate an inventory for a particular geographic region. For certain industry sectors, ARB draws data from various federal and state government agencies in a top-down approach. For other industry sectors, the data collected through the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions (MRR) program enables ARB to utilize the bottom-up approach. Verified data from the MRR for specific sectors such as in-state power generation, specified electricity imports, refineries and cement manufacturing were used in the 2012 emission inventory.

California Inventory and Other Greenhouse Gas Inventories

The California inventory is developed in a manner consistent with international and national guidelines to the greatest extent possible. Consistency maximizes the comparability of the inventory with similar inventories from other states and nations. This is important as California considers participation in standardized regional, national and international greenhouse gas emission reduction programs.

At an international level, the IPCC has developed standard international guidance for emission inventories (IPCC, 2006). Nations that have adopted the United Nations Framework Convention on Climate Change (UNFCCC) must prepare and report their emissions and sinks of CO_2, CH_4, N_2O, SF_6, PFCs, and HFCs using IPCC methodologies to ensure comparability among national inventories. The IPCC guidelines delineate the sectors and processes for which nations must report their greenhouse gas emissions and

sinks, and how they should report these emissions. They also describe various methodologies to estimate emissions depending on the available data sources (IPCC, 2006). The guidelines allow for use of state-specific data and methodologies rather than the more generic international ones when available. In the California inventory, state-specific emissions data were used whenever possible.

As a nation, the United States follows the IPCC guidelines (with the United States Environmental Protection Agency (U.S.EPA) acting as the lead agency) and submits its national greenhouse gas inventory to UNFCCC Secretariat annually. The U.S.EPA supplements the widely applicable IPCC methodologies with more US-specific methodologies and data (U.S.EPA, 2008).

Inventory Organization

ARB has presented the GHG emissions estimates in California inventory in three formats. First, the GHG emission estimates are presented in the categories outlined in the 2008 Scoping Plan, which focuses on areas for emission reductions. These Scoping Plan sectors include: transportation, electric power, commercial and residential, industrial, recycling and waste, High GWP gases, and agriculture.

Second, the emission estimates are categorized into traditional economic sectors based on economic activity within California, as defined by North American Industry Classification System (NAICS, 2012). These sectors include: agriculture and forestry, commercial, in-state electricity generation, imported electricity, industrial, residential, transportation, and others. The economic sector categorization allows for comparison with other ARB emission inventories, which are similarly categorized. This categorization scheme also provides a familiar reference for readers accustomed to reviewing emission estimates generated by national, state, and local air agencies. The primary difference with Scoping Plan sector categorization is that emissions from High GWP gases are placed under the appropriate sectors of industrial, transportation,

This categorization of the inventory based on economic sectors includes emissions from international and domestic ships operations within California waters under the transportation sector. The aviation category, located within the transportation sector, only includes emissions for intrastate flights. Interstate and international flight emissions are calculated and included as an informational item, but their greenhouse gas emissions are not counted (these are listed as "excluded emissions" in the inventory) in California's overall inventory. Unless otherwise indicated, emissions estimates in this report are categorized by the economic sectors and emission categories. A small portion of the total emissions could not be

attributed to any of the economic sectors and are therefore aggregated into a "not specified" group[1].

Finally, the emissions data have been categorized by IPCC levels, which is based on groupings of related emission processes and sinks as indicated in the IPCC Guidelines (IPCC, 2006), to ensure comparability with international and national inventories. This version includes five main sectors based on the IPCC categorization: energy; industrial processes and product use; agriculture and other land use; waste; and other.

Changes in the 2000-2012 Inventory

Updates to the methodologies used in the California inventory are an ongoing process. ARB staff regularly evaluates scientific developments in greenhouse gas inventories. In general, the majority of the methodologies and calculations used to generate the emission values have remained constant. However, every year ARB makes improvements to the methods or data used to determine greenhouse gas emissions.

The 2000-2012 GHG inventory represents a transition to global warming potentials (GWPs) in the IPCC's 4th Assessment Report (AR4) compared to previous GHG inventories that relied on GWPs from IPCC's Second Assessment Report (SAR). As a result, the GWP of methane changed from 21 to 25 and also revised the GWPs of other gases to their updated values (IPCC, 2007). For detailed discussions on the updated methodologies and changes to the emission estimates, refer to the Technical Support Document for the 2000 to 2012 inventory (CARB, 2014).

IV. Statewide Emission Estimates and Emission Trends

This section summarizes the latest information on **greenhouse gas emissions and trends in California based on the economic sectors categorization of the inventory**. The estimates reflect revisions to methodologies and data for the 2000 to 2012 time series. Detailed discussions on emission calculations and methodologies are comprehensively discussed in the technical support documents.

Emissions Trends

In 2012, total GHG and per capita emissions increased by 1.7% from 2011 emissions. This increase was driven largely by the increased reliance on natural gas-generation sources of in-state electricity due to the closure of the San Onofre Nuclear Generating Station (SONGS) as well as dry hydrological

[1] Unspecified emissions include emissions from categories that could not be attributed to a particular traditional economic sector.

conditions in 2012 (drought) causing a drop in the in-state hydropower generation. Total statewide greenhouse gas emissions have decreased from 466 million tonnes of carbon dioxide equivalent ($MMTCO_2e$) in 2000 to 459 $MMTCO_2e$ in 2012, a decrease of 1.6 percent.

Figure 2 depicts the general trend in the emissions by greenhouse gas from 2000 to 2012. Figure 2 also shows the percent contribution of each GHG to the 2012 statewide emission total. CO_2 is the largest contributor to statewide greenhouse gas emissions. CO_2 emissions accounted for approximately 88 percent of the emissions in 2000 and 85 percent in 2012. CH_4 and N_2O account for 8.3 and 2.9 percent of the total emissions in 2012, respectively. SF_6 emissions accounted for 0.1 percent of the total emissions. Other halogenated gases constituted approximately 4 percent of the total emissions.

Figure 2. California Greenhouse Gas Emission by Gas

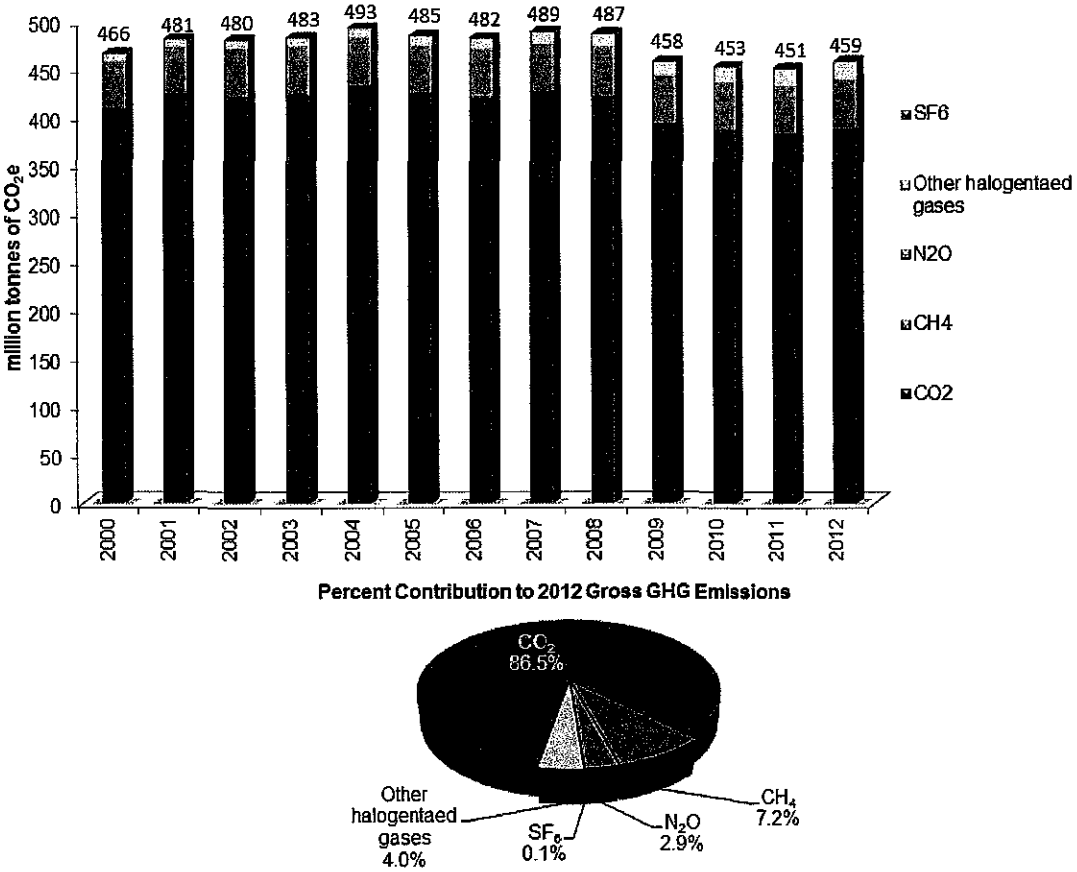


Table 1 shows the total statewide greenhouse gas emissions by gas type. Table 1 shows that the emissions of methane and halogenated gases increased from 2000 to 2012 and CO2, N2O, and SF6 decreased during the same period. Overall, CO2 emissions decreased by 5 percent from 2000 to 2012, and increased by 1.4 percent from 2011 to 2012. N2O and SF6 emissions also decreased by 10.9 and 30.1 percent, respectively, while CH4 and halogenated gas emissions increased by 12.3 and 137 percent respectively, from 2000 to 2012. Though the magnitudes of emissions increase of SF6 and halogenated gases are comparatively smaller from 2000 to 2012, their emissions are significant because of their high GWPs and longer atmospheric lifetimes.

Table 1. California Greenhouse Gas Emissions by Gas

Greenhouse Gas	GHG Gross Emissions ($MMTCO_2e$)*													Percent Change	
	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2000-2012	2011-2012
CO_2	409.3	424.4	421.5	423.4	433.5	425.3	421.4	426.3	422.3	393.8	386.8	383.5	388.7	-5.0%	1.4%
CH_4	34.0	34.3	34.5	35.0	34.3	34.7	35.7	37.3	37.9	37.7	37.3	37.5	38.1	12.3%	1.7%
N_2O	15.0	14.5	16.1	15.8	15.4	14.7	14.4	13.7	14.0	12.9	13.0	12.6	13.4	-10.9%	6.5%
SF_6	0.4	0.4	0.3	0.3	0.3	0.3	0.3	0.3	0.3	0.3	0.3	0.3	0.3	-30.1%	-3.2%
Other Halogentaed Gases	7.6	7.6	7.8	8.5	9.2	10.0	10.8	11.5	12.6	13.7	15.6	17.1	18.1	137.3%	6.3%
Total Gross Emissions	**466.3**	**481.2**	**480.3**	**483.1**	**492.9**	**485.1**	**482.5**	**489.2**	**487.1**	**458.4**	**453.1**	**450.9**	**458.7**	**-1.6%**	**1.7%**

* All greenhouse gases are weighted relative to CO_2 based on the IPCC's 4th Assessment Report.

Figures 3 illustrates the annual percent change in greenhouse gas emissions, where the maximum change occurred from 2008 to 2009 when the emissions decreased by almost 6 percent.

Figure 3. Annual Percent Change in California Greenhouse Gas Emissions

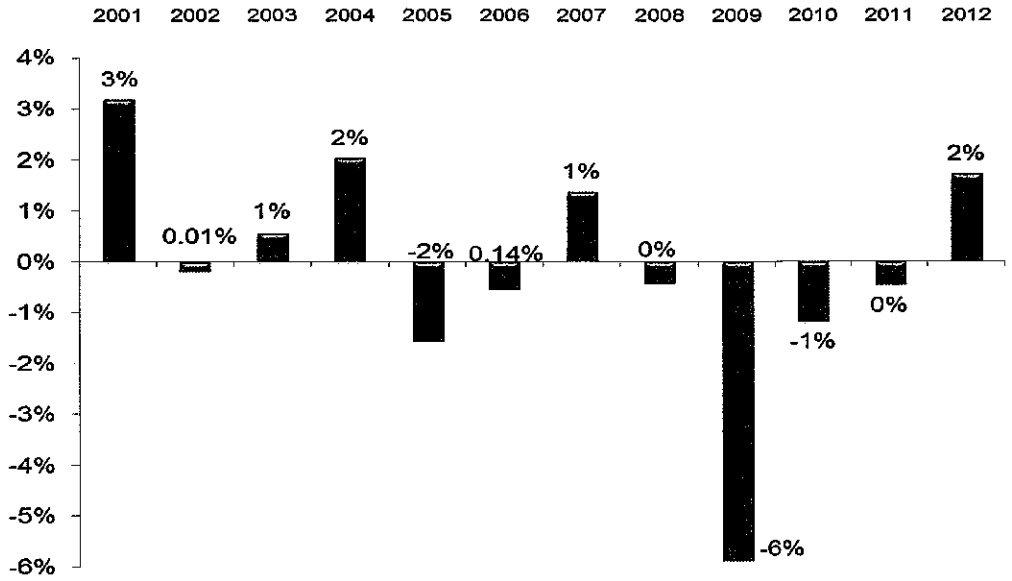


Figure 4 shows the cumulative change in emissions relative to the year 2000. absolute change in emissions from 2000 through 2012 cumulative effect of greenhouse gas emissions change from 2000 to 2012. The decline in the greenhouse gas emissions reversed from in 2012 for the first time since 2008.

Figure 4. Cumulative Change in California Greenhouse Gas emissions Relative to 2000

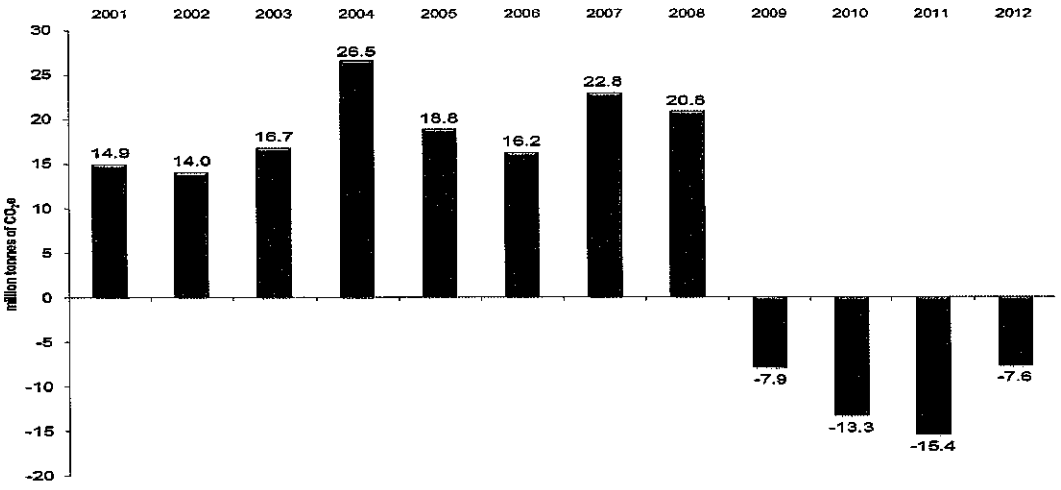
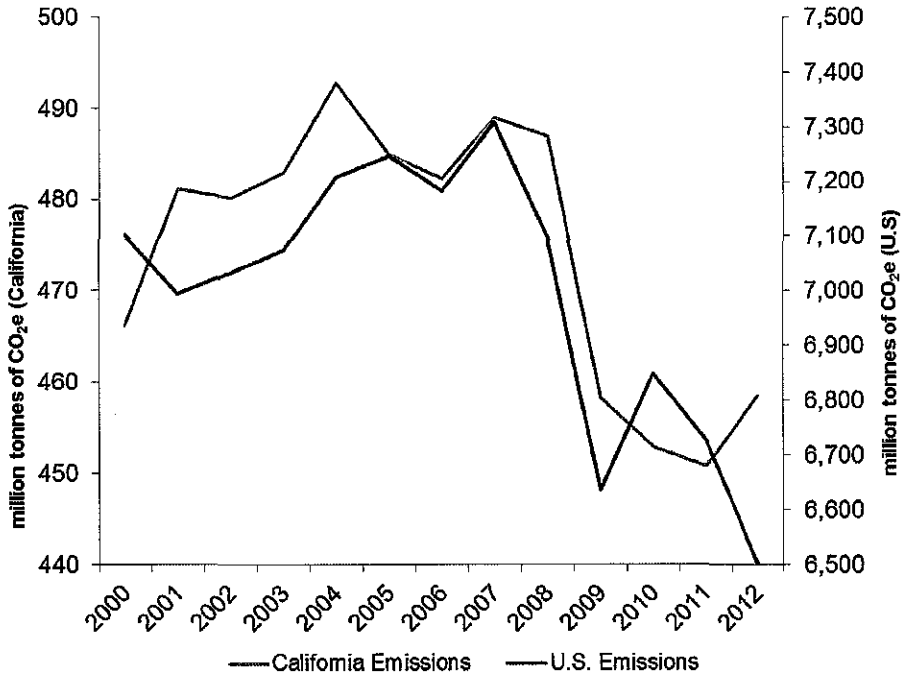


Figure 5 illustrates the trends in greenhouse gas emissions at the national and state level between 2000 and 2012. While the total emissions in 2012 increased by 5.9 percent from 1990 (431 $MMTCO_2e$), the emissions decreased by 5.9 percent from 2008 to 2009, the likely effect of the economic recession that began in late 2007. This decrease in emissions from 2008 to 2009 is also observed in the national emissions, a 7.2 percent decline from 2008 to 2009. From 2010 to 2012, the national emissions and the California emissions exhibit opposite trends. However, it is important to note that California emissions are based on the AR4, while national emissions are based on the SAR.

Figure 5. Recent Trends in Greenhouse Gas Emissions (U.S. and California)



Source: U.S emissions from Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2012 (U.S.EPA, 2014)
Note: CA emissions are based on AR4 while US emissions are based on SAR.

Table 2 summarizes the emissions from these economic sectors in the California inventory in $MMTCO_2e$. The table also presents the percent change in emissions for each of the sectors between 2000 and 2012. The percent changes in the emissions from 2011 to 2012 are also included. Table 3 presents the same 2000 to 2012 emissions by scoping plan categories.

Table 2. Recent Trends in California Greenhouse Gas Emissions by Inventory Economic Sectors

Sector	GHG Emissions ($MMTCO_2e$)[1]													% of Total Emissions in 2012	Percent Change	
	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012		2000-2012	2011-2012
Transportation	178.5	178.9	186.1	186.0	189.5	192.0	192.1	192.3	181.3	174.9	174.0	171.7	171.0	37.3%	-4%	0%
Industrial	103.3	101.5	101.6	101.2	103.3	101.5	99.7	96.7	97.5	95.2	99.3	99.7	100.7	21.9%	-3%	1%
Electricity Generation (in-state)	59.2	63.2	49.9	48.3	49.4	45.3	50.1	54.3	54.5	53.4	46.9	41.3	51.2	11.2%	*-14%*	*24%*
Electricity Generation (imports)	46.0	59.1	59.1	64.7	66.1	62.9	54.8	59.9	65.9	48.1	43.7	46.9	44.1	9.6%	*-4%*	*-6%*
Agriculture	32.5	32.8	36.0	36.5	36.3	36.5	37.8	37.0	38.0	35.8	35.7	36.3	37.9	8.3%	*16%*	*4%*
Residential	31.8	30.8	30.9	30.4	31.5	30.2	30.6	30.8	31.2	31.0	32.1	33.0	31.6	6.9%	-1%	-4%
Commercial	14.6	14.6	16.6	15.8	16.5	16.6	17.3	17.9	18.5	19.8	21.1	21.8	22.0	4.8%	51%	1%
Unspecified[2]	0.4	0.3	0.2	0.3	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.0%	-43%	0%
Total Gross Emissions[3]	**466.3**	**481.2**	**480.3**	**483.1**	**492.9**	**485.1**	**482.5**	**489.2**	**487.1**	**458.4**	**453.1**	**450.9**	**458.7**	**100.0%**	**-1.6%**	**1.7%**

[1] All greenhouse gases are weighted relative to CO_2 based on the IPCC's 4th Assessment Report.
[2] Unspecified includes emissions from evaporative losses, which could not be attributed to an individual sector.
[3] The sector emissions may not add up exactly to the above listed gross and net total emissions due to rounding.

Comment Letter 7

Table 3. Recent Trends in California Greenhouse Gas Emissions by Scoping Plan Categories

Sector	GHG Emissions ($MMTCO_2e$)[1]													% of Total Emissions in 2012	Percent Change	
	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012		2000-2012	2011-2012
Transportation	176.2	176.6	183.8	183.5	186.9	189.1	189.2	189.3	178.0	171.5	170.5	168.1	167.4	36.5%	-5.0%	-0.4%
Industrial	95.0	93.2	93.1	92.5	94.5	92.3	90.3	87.1	87.5	84.9	88.5	88.3	89.2	19.4%	-6.2%	0.9%
Electric Power (In-state)	59.0	63.0	49.7	48.1	49.2	45.1	49.9	54.1	54.3	53.3	46.7	41.2	51.0	11.1%	-13.5%	23.9%
Electric Power (Imports)	45.9	59.0	59.0	64.6	66.0	62.8	54.7	59.8	65.8	48.0	43.6	46.9	44.1	9.6%	-4.0%	-6.0%
Commercial and Residential	42.3	41.2	43.2	41.5	42.9	41.2	41.9	42.1	42.4	42.7	43.8	44.3	42.3	9.2%	-0.1%	-4.6%
Agriculture	32.5	32.8	36.0	36.5	36.3	36.5	37.8	37.0	38.0	35.8	35.7	36.3	37.9	8.3%	16.4%	4.2%
High GWP	8.0	8.0	8.1	8.8	9.6	10.4	11.1	11.8	12.9	14.0	15.9	17.3	18.4	4.0%	129%	6.1%
Recycling and Waste	7.2	7.4	7.3	7.4	7.4	7.6	7.7	7.8	7.9	8.1	8.2	8.2	8.3	1.9%	15.5%	0.9%
Total Gross Emissions[3]	**466.3**	**481.2**	**480.3**	**483.1**	**492.9**	**485.1**	**482.5**	**489.2**	**487.1**	**458.4**	**453.1**	**450.9**	**458.7**	**100%**	**-1.6%**	**1.7%**

[1] All greenhouse gases are weighted relative to CO_2 based on the IPCC's 4th Assessment Report.
[2] Unspecified includes emissions from evaporative losses, which could not be attributed to an individual sector.
[3] The sector emissions may not add up exactly to the above listed gross and net total emissions due to rounding.

Figures 6 shows the trend in emissions and Figure 7 shows the percent contribution of each inventory economic sector to the total emissions from 2000 through 2012.

Figure 6. Greenhouse Gas Emission Trends by Economic Sector

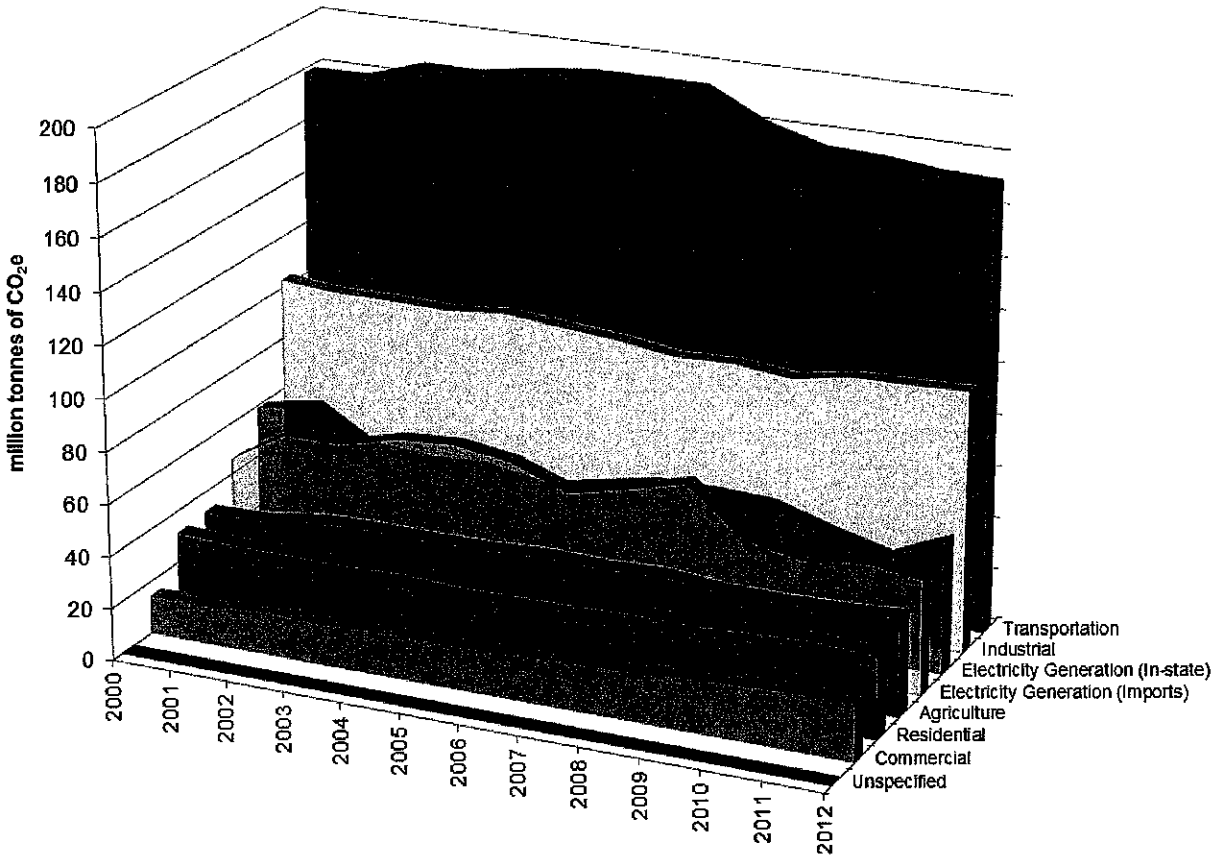
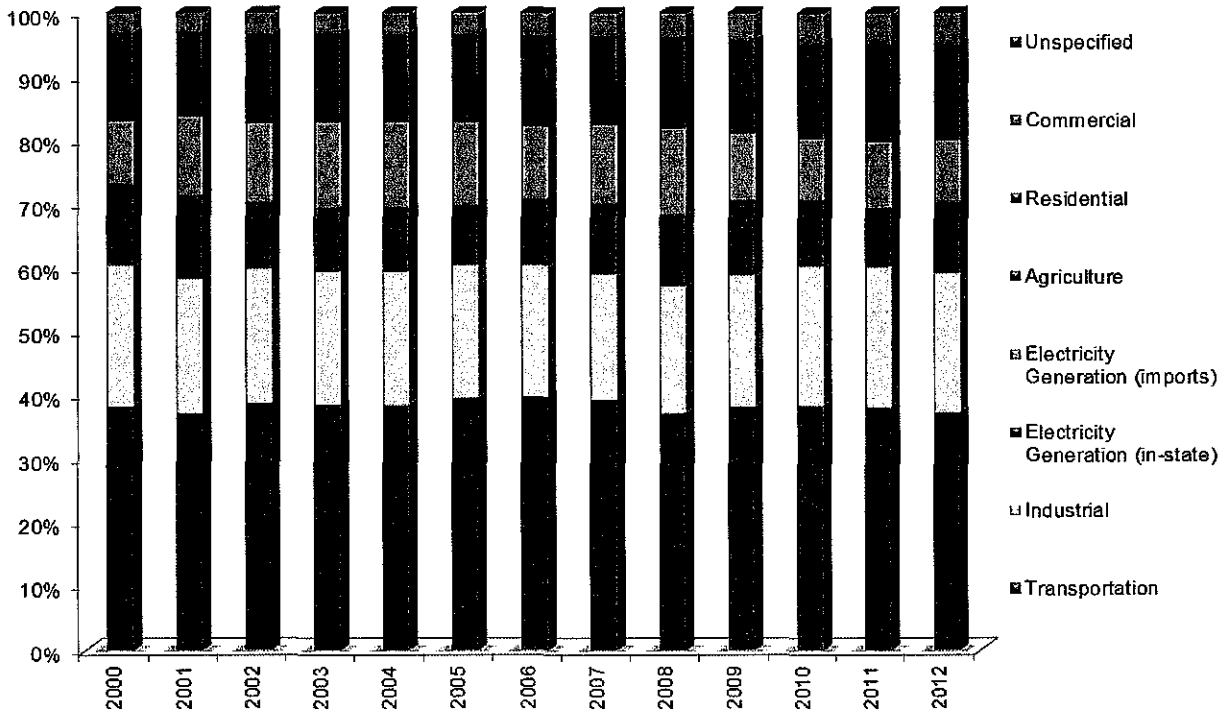


Figure 7. Contribution of Economic Sectors to Greenhouse Gas Emissions



Transportation was the major emitter of greenhouse gases in both 2000 and 2012, producing 171 $MMTCO_2e$ in 2012. The industrial sector was the next largest greenhouse gas contributor, emitting approximately 100 $MMTCO_2e$ in 2012.

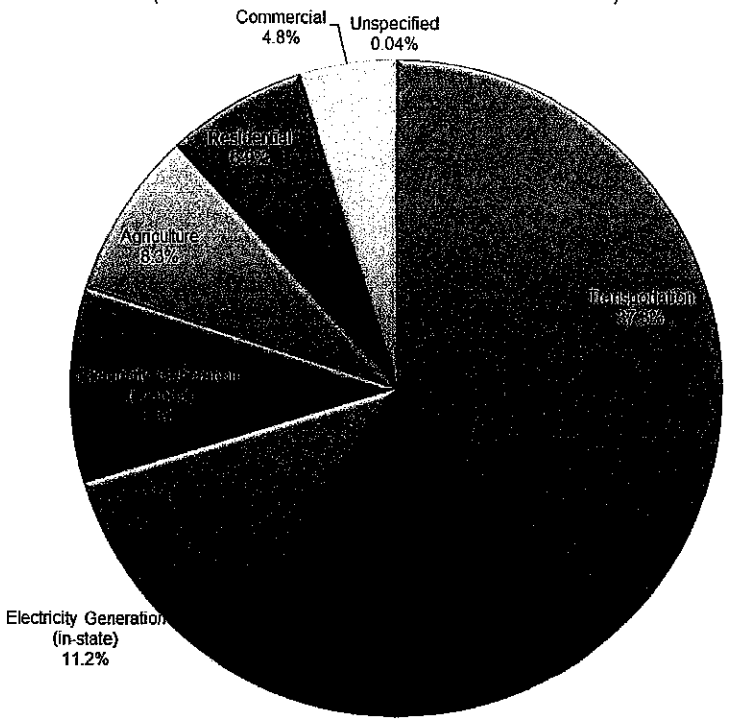
Emissions by Economic Sectors

This section presents the greenhouse gas emissions by the California inventory economic sectors: agriculture, commercial, electricity generation, industry, residential, transportation and unspecified.

Figure 8 displays the sectoral contribution to the total 2012 gross emissions, with transportation at more than 36 percent of statewide emissions thus making it the largest contributor to the total statewide emissions. Emissions from industrial sector, the second largest, accounted for 22 percent of the total emissions. Electricity generation accounted for approximately 21 percent of the total in 2012, with 11 percent in state generation. These three sectors accounted for approximately 80 percent of the statewide greenhouse gas emissions in 2012. Emissions from agriculture (8.3 percent), residential (6.9

percent), and commercial (4.9 percent) sectors accounted for approximately 20 percent of the total.

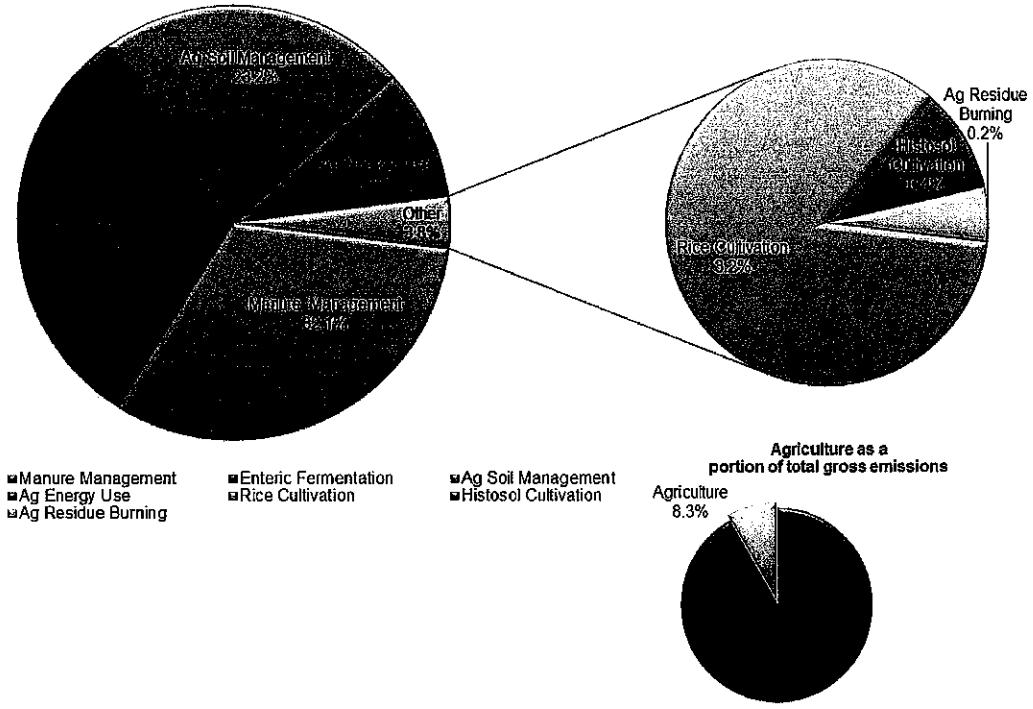
Figure 8. 2012 Greenhouse Gas Emissions by Economic Sector
(459 $MMTCO_2e$ Gross Emissions)



The majority of statewide greenhouse gas emissions were tied to fuel use activities, ranging from transportation to electricity generation to heating buildings. Emissions from fuel combustion comprised 72 percent of overall statewide greenhouse gas emissions in 2012. Primary fuels combusted include natural gas, which was used mainly for in-state electricity generation, residential and industrial uses, and gasoline, which was consumed almost entirely by the transportation sector. Detailed breakdown of the emissions from each of the economic sectors and their relative contribution to the total emissions is discussed in the following sections.

Agriculture: Emissions from agricultural activities were responsible for emissions of 37.9 $MMTCO_2e$, approximately 8.3 percent of total statewide greenhouse gas emissions in 2012. Agricultural emissions represent the sum of emissions from agricultural energy use, agricultural residue burning, agricultural soil management (the practice of utilizing fertilizers, soil amendments, and irrigation to optimize crop yield), enteric fermentation (fermentation that takes place in the digestive system of animals, e.g. cows and sheep), histosol (soils that are composed mainly of organic matter) cultivation, manure management and rice cultivation

Figure 9. 2012 Greenhouse Gas Emissions from Agriculture
(38 MMTCO2e Gross Emissions)



The contribution of the categories that contributed towards the 2012 agricultural greenhouse gas emissions is shown in Figure 9. Unlike other economic sectors, N_2O emissions from agricultural soil management and CH_4 emissions from enteric fermentation and manure management contributed towards most of the agricultural sector emissions. The majority of the emission contributions (86 percent) are due to manure management (32 percent), enteric fermentation (31 percent) and agricultural soil management (23 percent). The remaining 14 percent of the agricultural emissions was dominated by emissions from agriculture energy use category (10 percent).

Figure 10. Greenhouse Gas Emission Trends for Agriculture

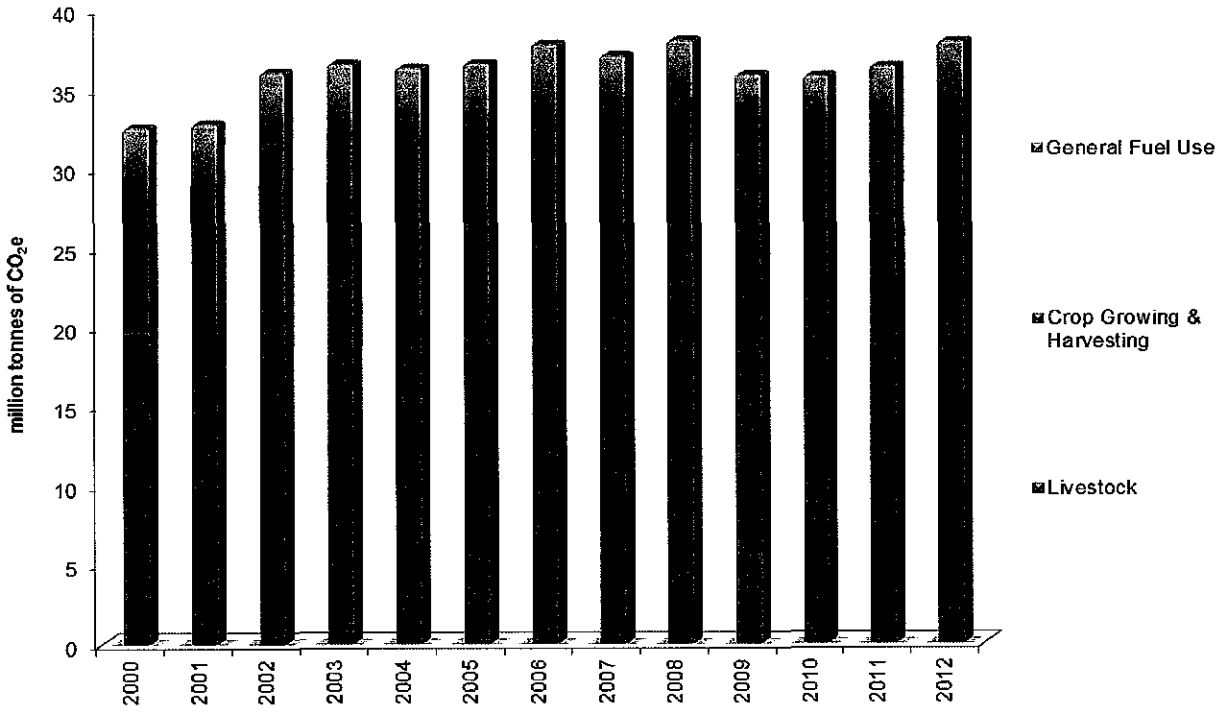
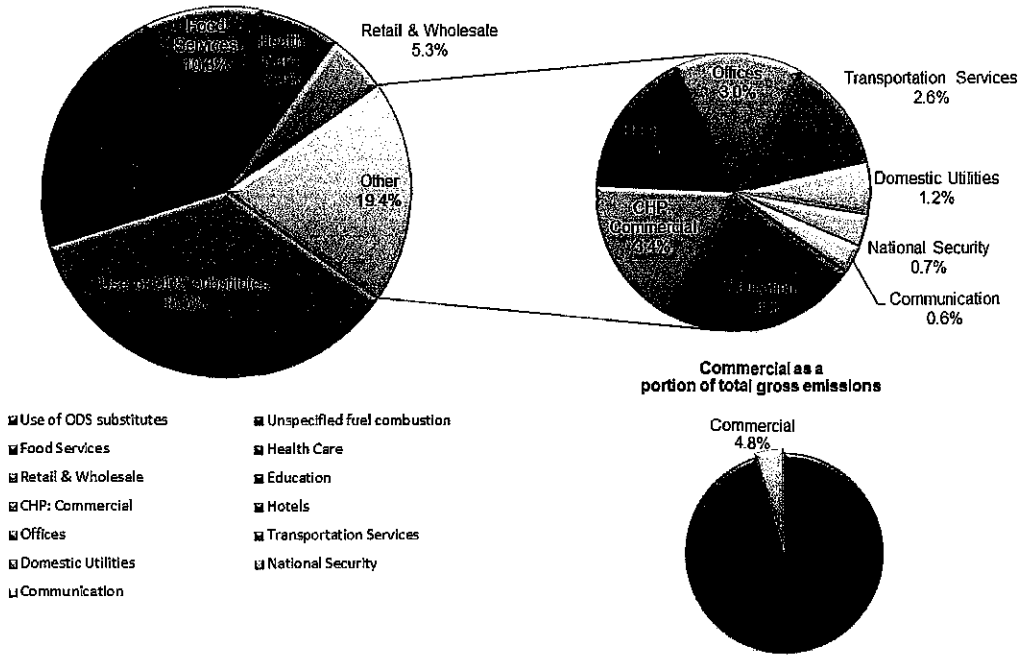


Figure 10 shows the trend in the emissions from each of these categories from 2000 through 2012. The agriculture sector increased its emissions from 32 $MMTCO_2e$ in 2000 to 38 $MMTCO_2e$ in 2012, a 16 percent increase. Agricultural fuel use was the only category that decreased their greenhouse gas emission from 2000 to 2012. Agricultural energy use decreased by 3 percent from 2000 to 2012, while manure management increased 29 percent during the same period.

Commercial: The commercial sector accounted for approximately 4.8 percent of the total statewide emissions in 2012. Greenhouse gas emissions from the commercial sector increased from 14.6 $MMTCO_2e$ in 2000 to 22 $MMTCO_2e$ in 2012. Commercial sector emissions grew approximately 51 percent from 2000 to 2012 and, approximately 1 percent from 2011 to 2012. The commercial sector in this version of the inventory includes the emissions from the substitutes for the ozone depleting substances (ODS).

Figure 11. 2012 Greenhouse Gas Emissions from Commercial
(22 $MMTCO_2e$ Gross Emissions)

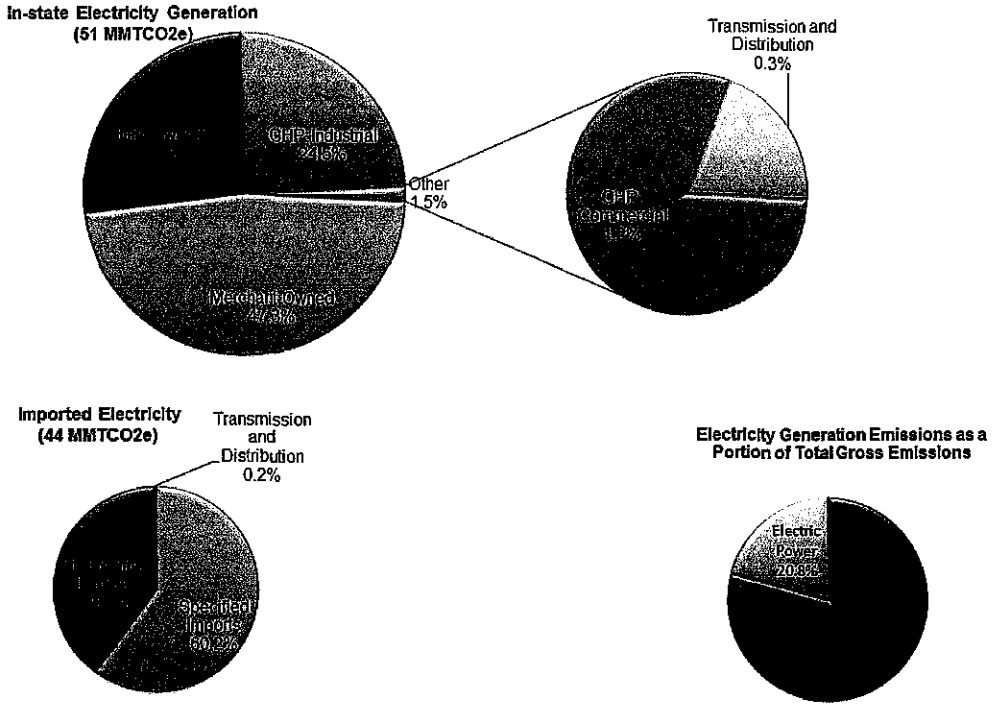


The emission contributions from the commercial sector are from commercial CHP, domestic utilities, education, food services, health care, hotels, national security, offices, retail and wholesale, transportation services, and unspecified sources. The sector includes fuel combustion for all commercial activities such as heating buildings, hot water and steam, and energy for natural gas transmission through pipelines. The primary fuel combusted was natural gas. Approximately 22 percent of the total emissions from this sector are due to natural gas combustion.

The percent contributions of each of these categories to the total 2012 emissions for this sector are shown in Figure 11. The largest contributor to emissions from the commercial sector was the use of ODS substitutes (36 percent). The second largest contributor in the commercial sector was the unspecified combustion of fuels (22 percent). Food services (10 percent) and healthcare (7 percent) were next two major contributors in this sector.

Electricity Generation: Electricity generation, transmission, and distribution accounted for 21 percent of total statewide greenhouse gas emissions in 2012. This sector was the third highest emitting sector in 2012, emitting 95 $MMTCO_2e$ that year. This sector includes power plants and cogenerators that generate electricity for on-site use and for sale to the power grid. This sector specifically includes greenhouse gas emissions from both in-state generated power and imported generation of electricity delivered to and consumed in California. Emissions from transmission line losses of electricity, as well as SF_6 emissions from transmission equipment, are also included. Figures 12 and 13 show the contribution of electricity generation sector to the total emissions and the trends in the emissions.

Figure 12. 2012 Greenhouse Gas Emissions from Electricity Generation
(95 $MMTCO_2e$ Gross Emissions)

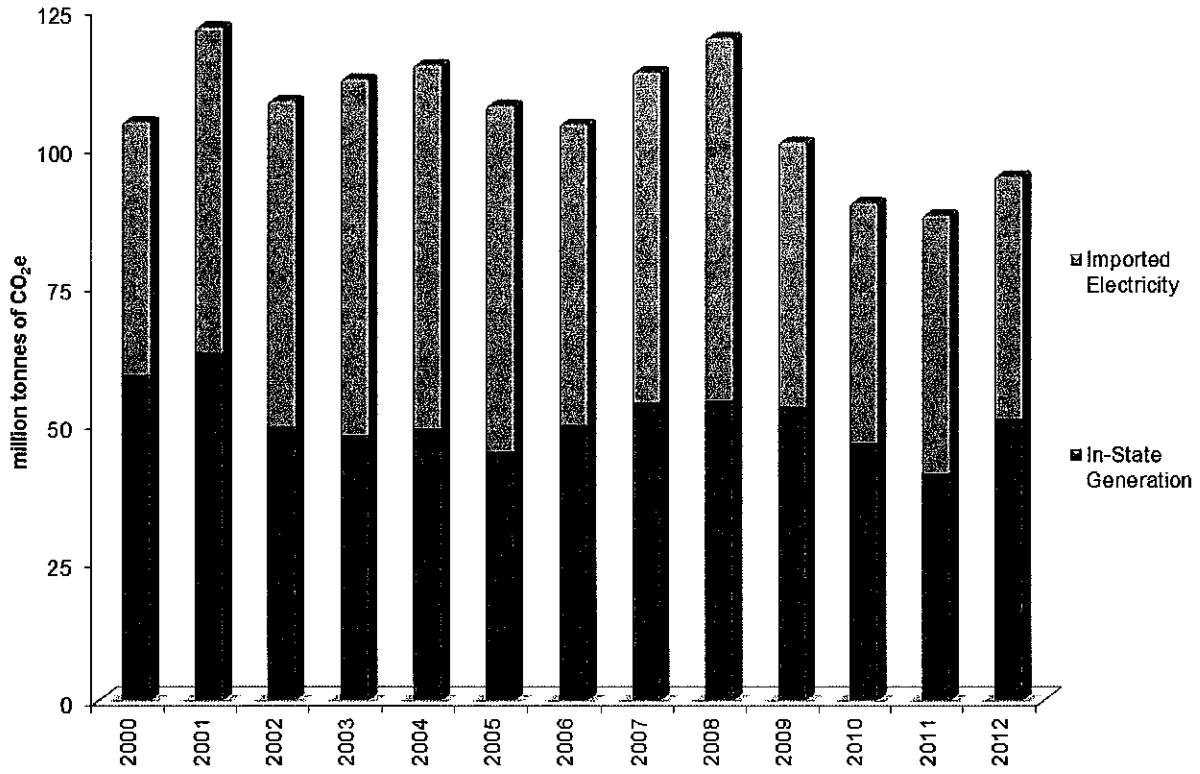


Electricity Generation (imports): The contributions from imported electricity generation are from specified imports (60 percent), unspecified Imports (40 percent) and transmission and distribution (< 1 percent).

Electricity Generation (in-state): Contributions from in-state electricity generation are from categories such as CHP commercial, CHP industrial, merchant owned (privately owned power plant), transmission and distribution, and utility owned (investor-owned power plant). The percent contributions from each of these categories to the total 2011 emissions from this sector are shown in Figure 12.

The merchant owned (47 percent) and CHP industrial (27 percent) contribute most to the in-state electricity generation emissions.

Figure 13. Greenhouse Gas Emission Trends from Electricity Generation



Industrial: Industrial sector includes contributions from CHP industrial, landfills[1], manufacturing, mining, oil and gas extraction, petroleum refining, petroleum marketing, pipelines, wastewater treatment, and other sources. The percent contributions from each of these categories to the 2012 total emissions from this sector are shown in Figure 14. Major contributors from this sector are petroleum refining (30 percent), manufacturing including cement plants (25 percent), oil and gas extraction (17 percent), CHP (11 percent), and landfills (8 percent). Approximately 90 percent of the total emissions from this sector can be attributed to these major categories. For the petroleum refining category, the combustion of fuels is the main source of emissions. Within manufacturing, fuel combustion and clinker production from cement processing are two of the largest sources. Landfills, wastewater treatment, and solid waste treatment, while serving an important societal function, account for only 9 percent of the total emissions from this sector.

[1] Landfill emissions are primarily due to the release of CH_4 (anaerobic decomposition). Carbon dioxide from paper/wood decomposition and from the combustion of landfill gas is included in the flux (See the Technical Support Document for more details).

Figure 14. 2012 Greenhouse Gas Emissions from Industry
(101 $MMTCO_2e$ Gross Emissions)

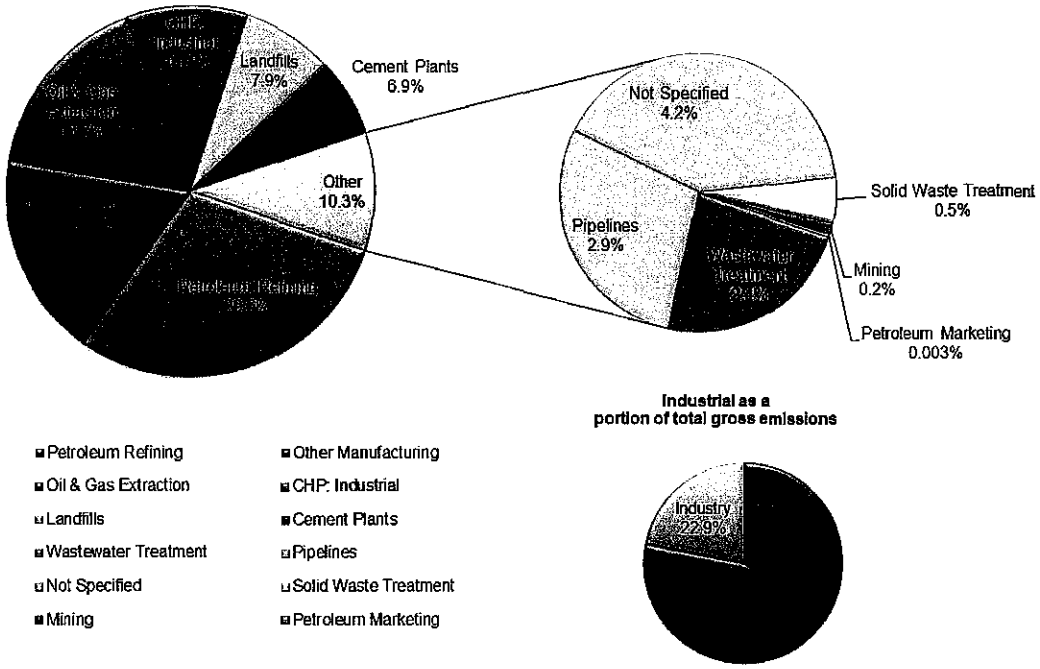
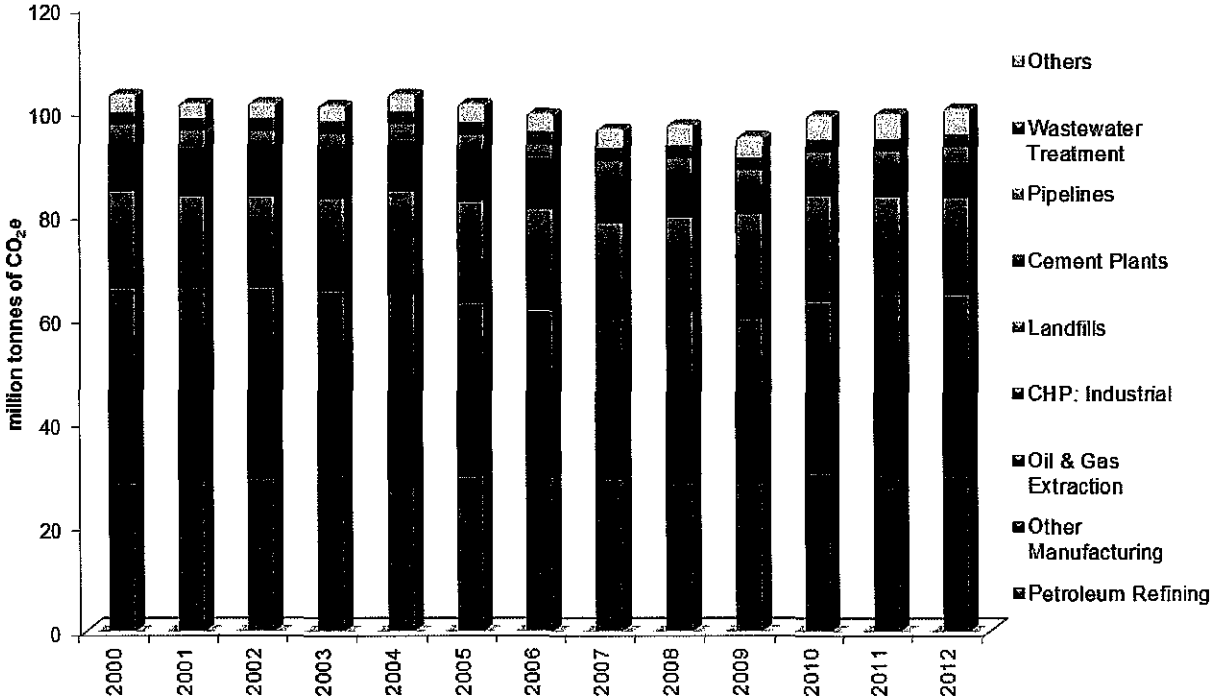


Figure 15. Greenhouse Gas Emission Trends from Industry

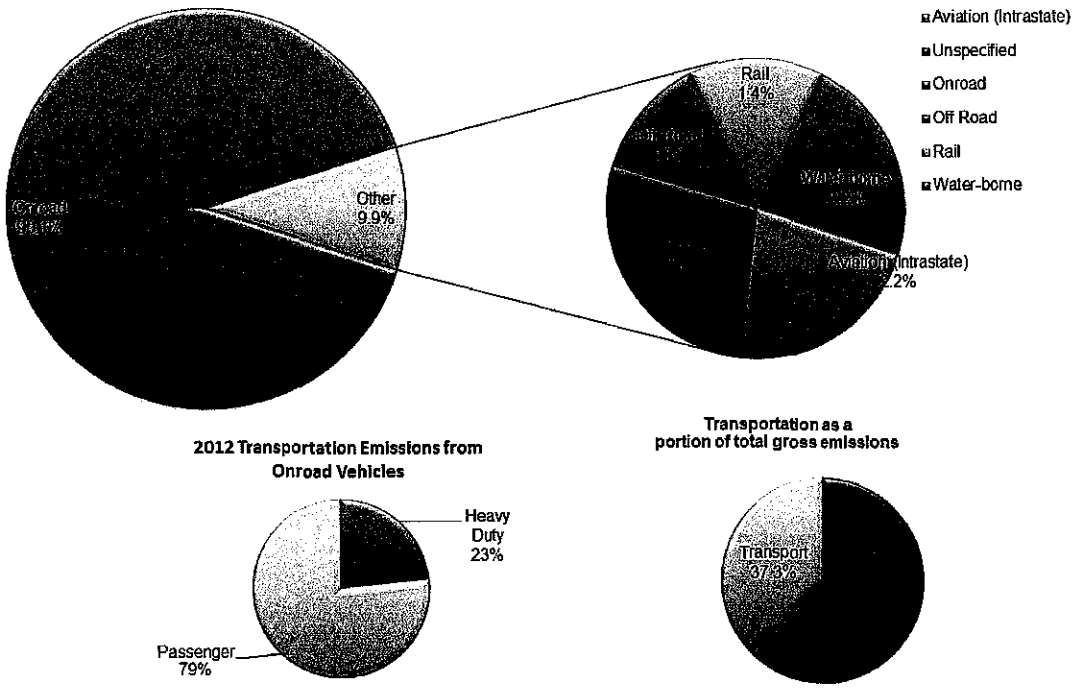


Overall, emissions from industrial sector were 103 $MMTCO_2e$ in 2000 and 101 $MMTCO_2e$ in 2012. The emissions decreased to 95 $MMTCO_2e$ in 2009 mainly due to the decrease in demand for cement.

Residential: The residential sector accounted for 6.9 percent of the total emissions in 2012, and primarily consisted of CO_2 emissions from fossil fuel combustion. Residential emissions are related to the use of fuel for general household needs. Approximately 99 percent of the fuel related emissions are from the burning of natural gas and LPG, with the majority attributed to the burning of natural gas. Emissions from residential fuel use increased from 31.6 $MMTCO_2e$ in 2000 to 32.7 in 2011.

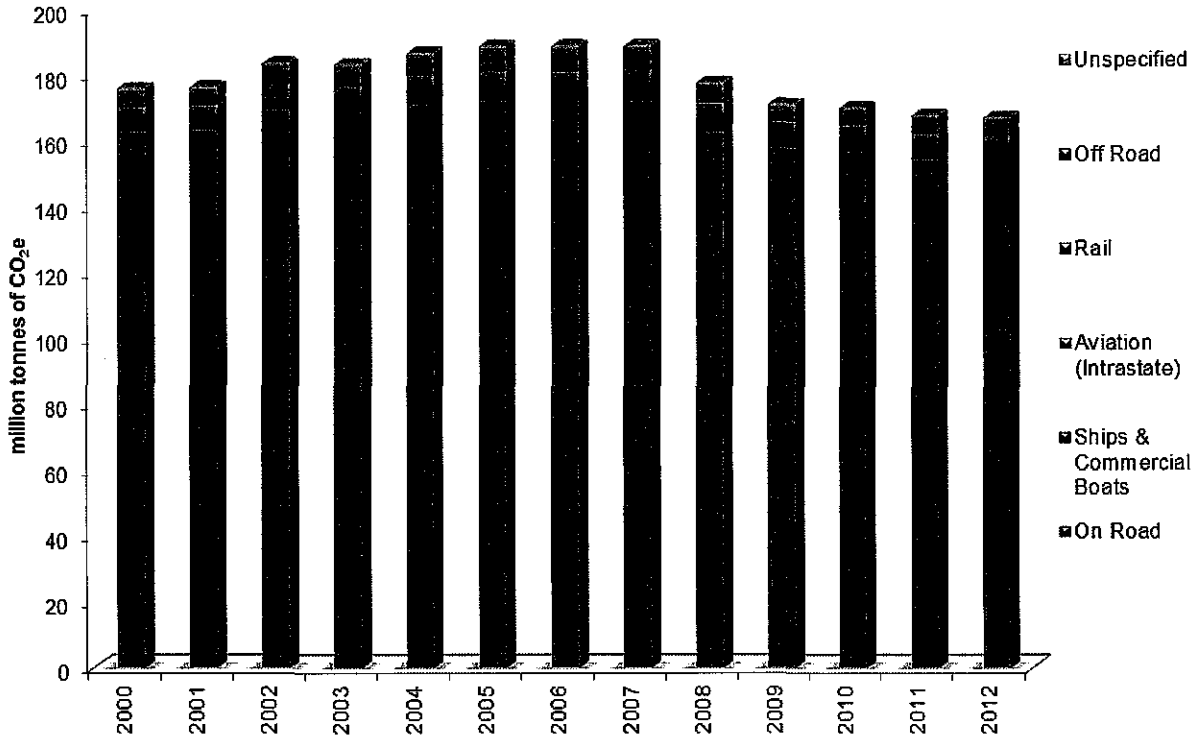
Transportation: Transportation activities accounted for 37.3 percent of the statewide greenhouse gas emissions in 2012. Contributions from the transportation sector include emissions from aviation, on-road, off-road, rail and water-borne and other unspecified sources. Emissions from military transportation activities are not included in the inventory total for the State. The percent contributions from each of these categories to the total emissions from this sector are shown in Figure 16 for 2012.

Figure 16. 2012 Greenhouse Gas Emissions from Transportation
(171 $MMTCO_2e$ Gross Emissions)



An overwhelmingly large majority of emissions from this sector is due to on-road transportation (90 percent). The on-road category also accounts for more than 33 percent of the statewide 2012 greenhouse gas emissions. Of the on-road vehicles, light duty passenger vehicles accounted for approximately 69 percent of the total sector emissions in 2012. Figure 17 shows the trend in emissions for this sector from 2000 through 2012. Transportation emissions showed a marked decline since 2007 (from a high of 192 $MMTCO_2e$ in 2007 to 171 $MMTCO_2e$ in 2012).

Figure 17. Greenhouse Gas Emission Trends from Transportation



Summed together, the above sectors along with the unspecified emissions in the inventory not attributed to any sector, equal the total emissions accounted for in the California inventory. Unspecified emissions include emissions from evaporative losses, which could not be attributed to a specific economic sector. In the previous version of the inventory, emissions from the use of ODS substitutes was categorized in the unspecified emissions. However, in this version, those emissions are attributed to individual sectors. The ODS substitute category includes hydrofluorocarbon (HFC) and perfluorocarbon (PFC) emissions, which are substitutes to chlorofluorocarbons (CFCs), compounds that were phased out under the Montreal Protocol due to their ozone depleting ability.

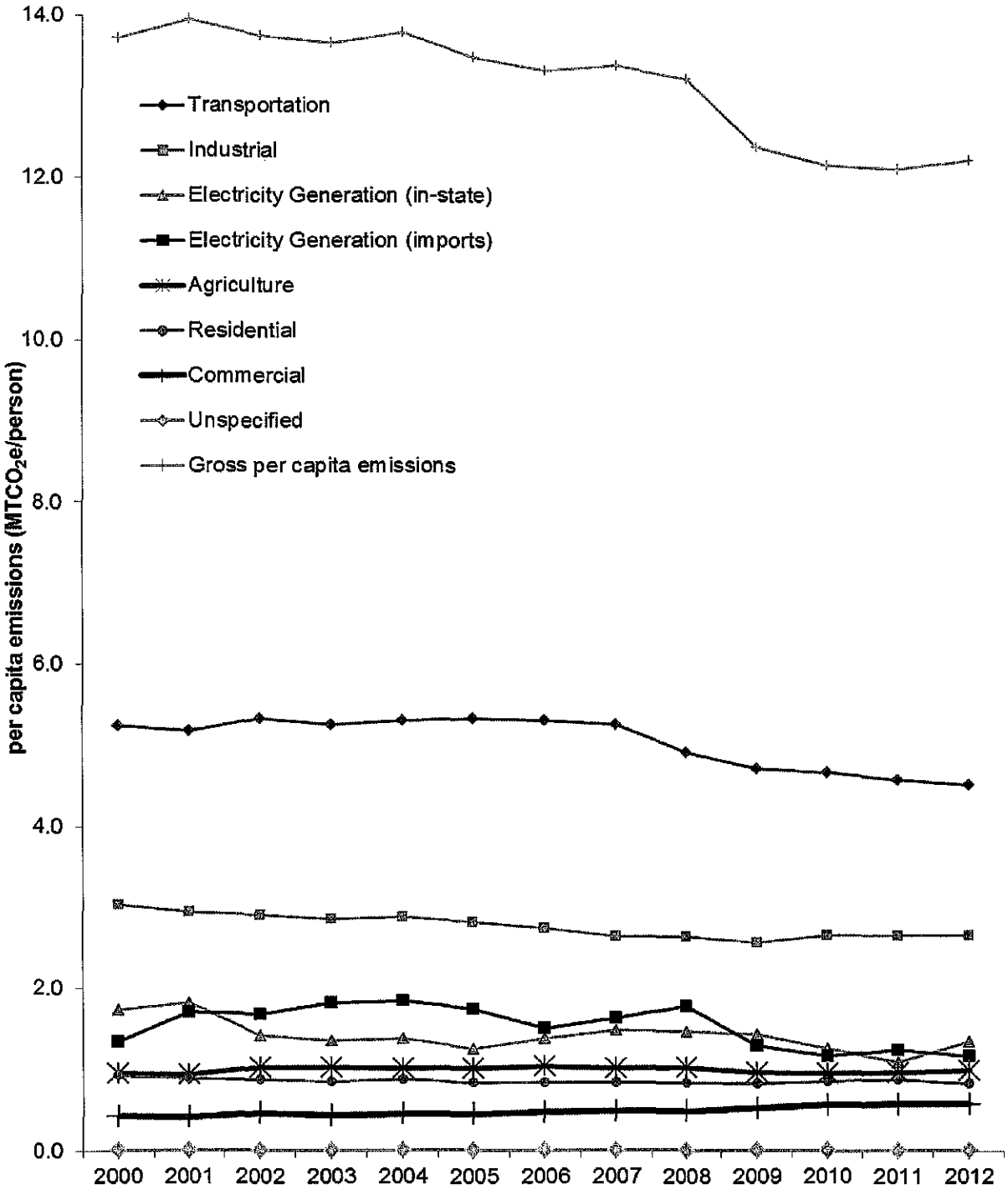
This sector-specific methodology (except for electricity imports and internationally-flagged shipping) generally reflects the reporting methods used by the U.S.EPA and the IPCC.

Per Capita Emissions

For the year 2012, California has a gross per capita emissions of 12.2 $MTCO_2e$ per person (Figure 18). This represents a 12 percent reduction from the 13.7 $MTCO_2e$ per person in 2000 (Figure 18). The population increased by 11.4 percent during the same period.

Per capita emissions from industrial, transportation, and electricity generation (in-state) have decreased from 2000 to 2012, with a 22 percent decrease in the 2012 in-state electricity generation per capita emissions from 2000. The per capita comparison is a useful metric for emissions evaluation because it shows that emissions have not grown consistently with population, indicating that energy conservation may have led to significant emission reductions.

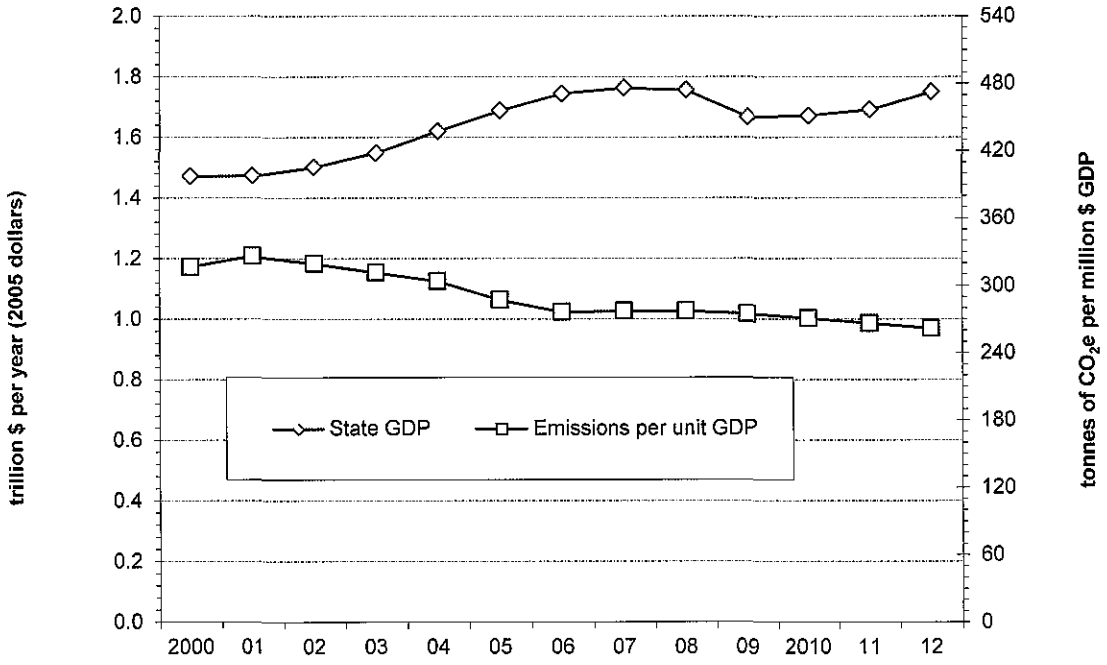
Figure 18. 2012 Greenhouse Gas Emissions per Capita



Carbon Intensity of California Economy - Gross Domestic Product

California's Gross Domestic Product (GDP) increased from $1.47 trillion in 2000 to $1.75 trillion in 2012 (in 2005 dollars)(DoF, 2014). While California's economy has continued to grow, the "carbon intensity" of the economy, the amount of carbon emissions related to the state's overall economy (tonnes CO_2/ GDP$), has continually declined since 2001. The carbon intensity of California's economy has decreased from 316.6 tonnes CO_2e per million dollars in 2000 to 261.9 tonnes per million dollars in 2012. That equates to a 17 percent decrease and California ranks as the 46th lowest state in the nation in terms of carbon intensity.

Carbon Intensity of California's economy



V. Broader Perspective of California Greenhouse Gas Emissions

To get a broader perspective of California GHG emissions, it's interesting to compare with other states and nations GHG emissions. Even though the California inventory was designed to facilitate comparability with other nations and states, often the international emissions data is incomplete or of a different time. For this reason, this section uses data from the World Resources Institute (WRI) Climate Analysis Indicators Tool (CAIT) for comparing California's inventory to other states in the United States and other countries around the world (WRI, 2014). CAIT2.0 includes greenhouse gas emissions data for the period 1990-2010. The data include the six major greenhouse gases from most major sources and sinks for over 185 countries as well as state-level data for all 50 U.S. states and the District of Columbia.

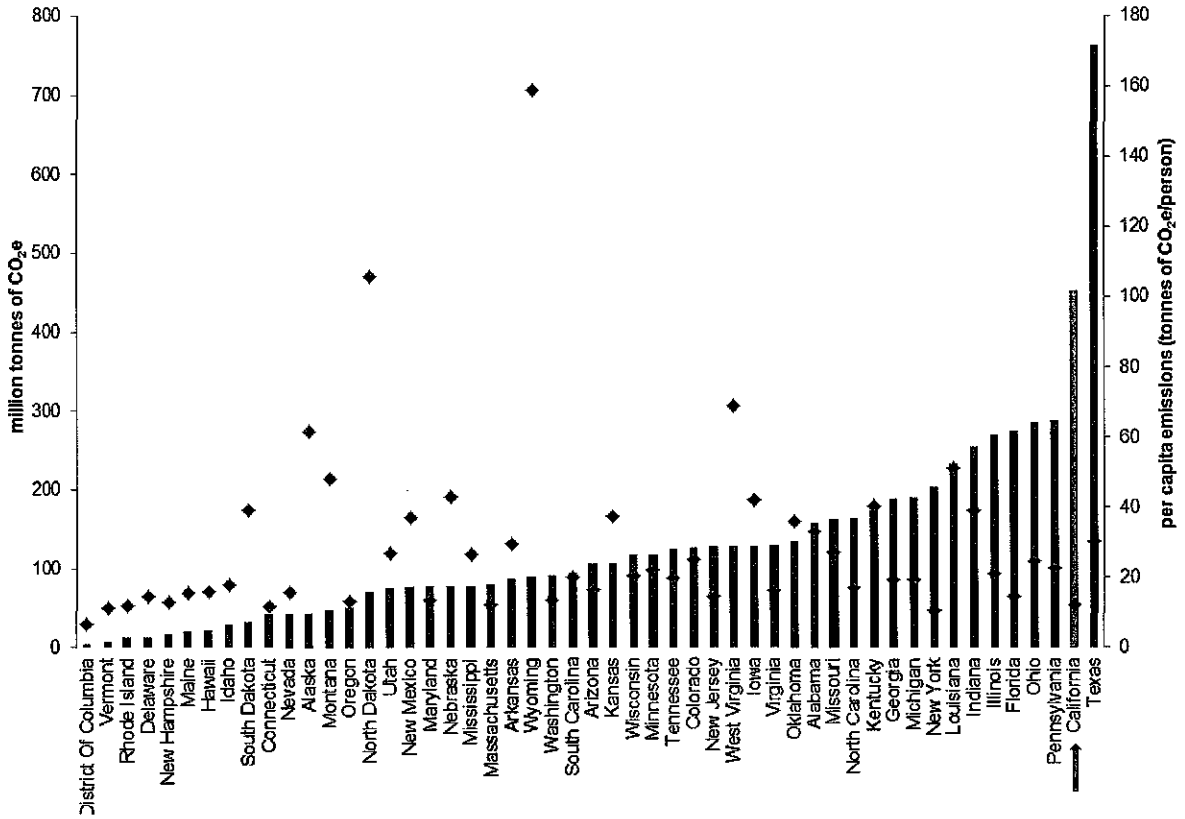
California and Other States

The 2010 greenhouse gas emissions data from CAIT 2.0 (WRI, 2014) was the latest available and hence used to compare 2010 emissions from California with emissions from other states in the United States. The data for California emissions for year 2010 was based on the 2000-2012 statewide inventory. The data for all other states was from the WRI CAIT 2.0 tool.

Figure 19 shows the total and per capita greenhouse gas emissions for 2010 for all the states in the country (WRI, 2014). In 2010, California accounted for 6.8 percent of all emissions in the country and ranked second highest among the states with total emissions of 453 $MMTCO_2e$, only behind Texas with 763 $MMTCO_2e$. From a per capita standpoint, California has the 45^{th} lowest emissions with 12.1 $MTCO_2e$/person in 2010.

Figure 19. Total (bars) and Per Capita (markers) California and Other States Greenhouse Gas Emissions (CAIT-U.S. v4.0)

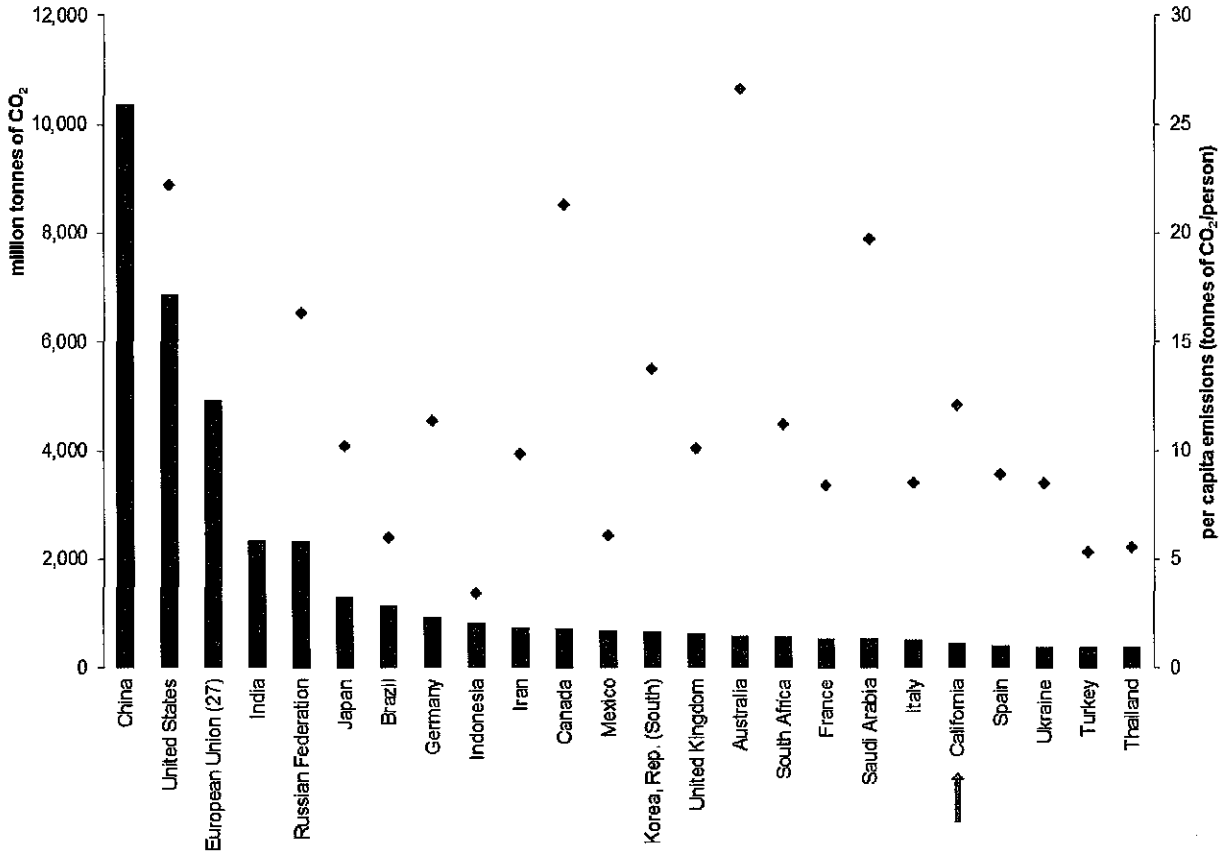
Total and Per Capita Greenhouse Gas Emissions for 2010



California and the Rest of the World

California has substantial greenhouse gas emissions when compared with the nations of the world. CAIT was used to compare 2010 California emissions against 2010 emissions from countries of the world, including the United States (WRI, 2014). A comparison of 2010 total and per capita greenhouse gas emissions as obtained from CAIT for California and the rest of the world is shown in Figure 20.

Figure 20. Total (bars) and Per Capita (markers) California and Other States Greenhouse Gas Emissions (CAIT-U.S. v4.0)
Total and Per Capita CO_2 Emissions for 2010



If California were considered as an independent state, on a global platform in 2010, California would have ranked the 20th highest in CO_2 emissions worldwide. On a per capita emissions basis, California would have ranked 38th in the world with 12.1 $MTCO_2e$/person in 2010, behind United States (including California) at rank 16 with 22.2 $MTCO_2e$/person. Kuwait had the highest per capita emissions at 71.8 $MTCO_2e$/person. The top 10 emitters (individual nations, excluding data for European Union) accounted for a large part of the total global greenhouse gas emissions in 2010 (approximately 70 percent).

VI. Ongoing Work

ARB staff routinely evaluates the methodology used to develop the emissions estimates used in the inventory. In addition, data from a variety of sources are reviewed and compiled for use in updating the inventory each year. ARB regularly releases updated emission inventory data, summary reports, and technical support documents that detail the emission inventory for public use It is anticipated that ARB staff will continue to release updates in the future. All reports are available on ARB's greenhouse gas emission inventory webpage.

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Appendix A

2012 Statewide Greenhouse Gas Inventory Emission estimation methodology changes from year 2011:

Inventory-wide change:

- Year 2012 inventory is based on GWP values from IPCC's AR4. Year 2011 GHG inventory was based on the GWP values from the IPCC's second assessment report (SAR).

Sectoral changes are listed below:

Transportation:

- Aviation gasoline data source changed from EIA to BOE.
- On road "gasoline" gallons sold (i.e. gasoline + ethanol) changed slightly due to updates BOE made to the data series back to 2004.
- New methodology uses MRR gasoline and ethanol gallons data to create a percentage mix, instead of using CEC's reported ethanol percentage mix.
- Most water-borne categories changed due to updates in the models on recession and longer term growth forecasts.

Electric Power:

- Combined Heat & Power (CHP) data for 2009-2012 were updated to reflect the same methodology used from 1990-2008, which is the EIA method. (MRR data for these years, produced aberrations in the trend).

Industrial:

- The small amount of Coal and Coke use not reported to MRR was finally determined not to exist (based on EIA data), and was eliminated.
- Off-road Gasoline use now uses MRR totals reconciled to BOE on-road amounts.

Commercial and Residential:

- No methodology changes from year 2011 to 2012.

Agriculture:

- An improved emission factor was derived for rice cultivation for years 2000-2012, in collaboration with USEPA.
- New categories: Dairy calves and beef calves (less than 6 months) have been added for completeness.

High GWP:

- No methodology changes from year 2011 to 2012.

Recycling and Waste:

- No methodology changes from year 2011 to 2012.

Note: For detailed changes related to each sector, please refer to the Technical Support Document 2000-2012.

ATTACHMENT D

PASSENGER CAR EQUIVALENTS FOR HEAVY VEHICLES IN WORK ZONES

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Word Count: 4420
Number of Figures: 1

Submitted for Presentation at the 87th TRB Annual Meeting and Publication in TRR.

Nov 15, 2007

ABSTRACT

There are no PCE values developed for work zones. Consequently the PCE values of basic freeway section are borrowed despite the reservations about their applicability to WZ. This paper extended the delay-based methodology that was developed for intersections to work zones, and developed PCE values for heavy vehicles in work zones. Delay is used for defining the equivalence because it captures the effects of the heavy vehicles better than headway. Simulation was used to quantify the delays caused by the heavy vehicles so PCE values can be determined. Delay and consequently delay-based PCE (D-PCE) values are affected by the length of the work zone, the speed difference between cars and heavy vehicles, traffic volume, percentage trucks and other work zone factors. The D-PCE values computed when there is a 10 mph speed difference between cars and heavy vehicles ranged from 2.8 to 7.7. The D-PCE values decreased with increasing heavy vehicle percentage and increased with volume.

INTRODUCTION

Work zones have become the rule rather than the exception on highways today. About 20 percent of the U.S. National Highway System has been reported to be under construction during the peak summer road work season *(1)*. Work zones are a major contributor to the delay experienced by the motorists and are estimated to account for 889 million vehicle hours of delay which is nearly 24 percent of all non-recurring delay *(2)*. Another study *(3)* found that work zones contribute to 10% of the delay experienced in the entire United States and to 80 to 90% delay experienced in rural areas. Consequently managing traffic through work zones in a safe and efficient manner is a critical task that requires reliable and accurate information. Two important pieces of information for this task are the estimated values for capacity and delay. One of the key factors in capacity estimation is the passenger car equivalent (PCE) values used to convert heavy vehicles to equivalent number of cars. Heavy vehicles have adverse effects on work zone traffic flow and proper conversion of them to equivalent number of cars is a very important step in capacity calculation. It is estimated that about 36% of the rural interstate and 63% of urban interstate highway segments would carry more than 10,000 trucks per day by the year 2020 *(3)*. Consequently, accounting for the effects of heavy vehicles accurately becomes even more crucial.

There has been no published work on PCE of heavy vehicles in work zones. Due to this paucity of data, researchers *(4)* had to use the PCE values in Highway Capacity Manual 2000 *(5)* for basic freeway section despite being concerned about their applicability to WZ. Traffic flow in work zones is fundamentally different from basic freeway sections because of the influence of factors such as work activity, traffic control devices, speed control strategies, less than ideal geometric characteristics, fewer lanes for travel, speed difference between vehicle types, etc. All these can affect the speed and flow characteristics in WZ thus requiring developing capacity estimation techniques that are more appropriate for work zones.

In this paper we extended the delay-based methodology that was developed by Benekohal and Zhao *(6)* for intersections to work zones, and developed PCE values of heavy vehicles in work zones. First the approaches that were used to compute PCE in the past are summarized, followed by a discussion on which approach should be used. Following this the delay-based PCE methodology is presented and how it is used to compute the D-PCE values. This is followed by a discussion of how the D-PCE values are affected by traffic volume and truck percentage and how these values compare with the HCM values.

PAST APPROACHES TO COMPUTING PCE

The 1965 Highway Capacity Manual *(7)* first introduced the concept of Passenger Car Equivalent (PCE) and defined it as "The number of passenger cars displaced in traffic flow by a truck or a bus, under the prevailing roadway and traffic conditions." Since then several studies using different approaches have been performed to estimate PCE. In this section a brief summary of the prominent studies using the different approaches is presented.

Headways

The headway ratio method was pioneered by Greenshields *(8)*. The concept behind using the headways (time or space) is that headway is a measure of the space occupied by a vehicle. PCE is defined as the ratio of average. This is the most commonly used method for measuring PCE at signalized intersections. This method has also been used for basic freeway sections and rural highways *(9,10)* but by considering the space headways instead of time headways. When the headway approach is used, the effect of the heavy vehicle on only the vehicle that is immediately following it is being considered. Therefore, major deficiency of headway approach is that it does not take into account the additional delay caused to the entire traffic stream due to heavy vehicles in work zones. Molina *(11)* proposed a modified headway approach to computing PCE at signalized intersections. Unlike the headway approaches discussed above, this approach considers the increased headways of the vehicles queued behind the truck at the signalized intersection but does not consider the additional delays experienced by the queued vehicles.

Speed

Speed has been used as the measure of performance primarily for two-lane and multilane highways. For two-lane highways St.John *(12)* and St.John and Kobett *(13)* developed a nonlinear relationship for deriving PCE using mean speed as the measure of equivalence. Linzer et al *(14)* used operating speed as the parameter for multilane highways. Messer *(15)* used simulation to compute PCE on two-lane highways. TWOWAF, a simulation model was used for this study. Van Aerde and Yagar *(16)* developed PCE for two-lane highways based on the speed reduction potentials of different vehicle classes.

Density

Webster and Elefteriadou *(17)* used density for computing the PCE of trucks on basic freeway sections. FRESIM was used to generate the density data for the different scenarios. The method used to determine the PCE is based on a method developed by Sumner et al *(18)*.

Travel Time or Delay

Keller and Saklas *(19)* derived PCE for urban arterials using total travel time of the traffic stream as the parameter. PCE was defined as the ratio of total travel time of heavy vehicles to the travel time of passenger cars traveling through an urban network. Cunagin and Messer *(20)* used delay to compute the PCE for trucks on two-lane highways. Craus, Polus and Grinberg *(21)* also proposed a method to compute PCE for two-lane highways based on delay. They also considered the delay due to the opposing traffic stream. However, these formulations for PCE do not ensure that the mixed and the passenger car-only traffic stream have the same total delay. Benekohal and Zhao *(6)* presented a methodology for computing PCE at signalized intersections based on delay. The underlying concept is that both the mixed and equivalent passenger car-only stream

have the same total delay. Before this work the PCE for intersections was primarily based on headways. Although all the approaches discussed in this section use delay in computing PCE, only Benekohal and Zhao's approach results in same total delay for both the mixed stream and the equivalent passenger car only stream.

It should be noted that in work zones delay captures the effects of heavy vehicles better than any other factor. For example headway considers the effect of heavy vehicle only on the adjacent vehicle and not on all the vehicles that may be delayed if the heavy vehicle is traveling at a slower speed than cars. However when delay is considered the effect of heavy vehicle on all the cars is considered. Therefore a delay-based approach has been used to compute the PCE of heavy vehicles in work zones.

DELAY-BASED PASSENGER CAR EQUIVALENT (D-PCE) METHODOLOGY

The delay-based PCE used in this paper was first introduced by Benekohal and Zhao *(6)* for developing PCE for heavy vehicles at signalized intersections. In this research this concept is extended to the work zones. Delay-based PCE (D-PCE) is based on the concept that the additional delay caused by the presence of heavy vehicles is directly related to the capacity-reducing effect of the heavy vehicles in a work zone. The ratio of delay caused by a heavy vehicle to the delay of a car in an all passenger car traffic stream is defined as D-PCE. Mathematically D-PCE can be expressed as in equation (1)

$$D\_PCE_i = 1 + \frac{\Delta d_i}{d_0} \quad (1)$$

Where

$D\text{-}PCE_i$: delay based PCE for a heavy vehicle type i,

Δd_i : the additional delay caused by a heavy vehicle of type i

d_0 : the average vehicle delay when the traffic is composed of all-passenger cars.

Since delay is the parameter of concern in work zones, Delay-based PCE ensures that the mixed traffic stream and the equivalent passenger car only stream have the same total delay. For example, if a caravan of 10 cars experiences a delay of 50 seconds the average delay experienced (d_0) is 5 sec/veh. However if a caravan consisted of 2 trucks and eight cars and the total delay experienced was 70 seconds, the average additional delay due to each truck is $\Delta d = (70-50)/2 = 10$ sec/truck. Thus the D-PCE computed is $1+10/5 = 3$. In other words, if each of the trucks were to be replaced by 3 cars to make a total of 14 cars the total delay would be $14*5 = 70$ sec for the traffic stream. This is the difference between D-PCE approach and other approaches which used delay to compute PCE in the past.

There are several factors that can influence delay in work zones and thus D-PCE values. The main influential factors are: traffic volume, truck percentage, length of work zones, speed difference between vehicle types, grade and length of grade, lane and shoulder widths, speed control strategies, number of travel lanes in work zone.

Considering the huge number of combinations that can arise from changing these factors, it is not possible to collect field data for all these conditions. Even if there were time and resources to collect the field data it is impossible to control in the field the variation of each factor in the combinations. Thus, practically it is impossible to collect a complete set of field data to develop D-PCE values.

Therefore simulation is used to compute the D-PCE values for heavy vehicles in work zones. VISSIM was validated using field data from work zones by the authors. The default VISSIM was found to result in a capacity of about 2000 pcphpl, which is reasonable and comparable to the capacities of work zones found in earlier research. Therefore VISSIM with default values of the car following parameters is used to generate the D-PCE values. How VISSIM was used to do this is discussed in the following section.

COMPUTING D-PCE USING VISSIM

Concept

In VISSIM *(31)*, input files are created according to the values of the different parameters. The general structure of the network created in VISSIM is that there are four links:

1. Upstream link: This link represents the regular basic freeway section.
2. Transition link: This link represents the stretch of freeway where the lane closure has not begun, but the speed limit is reduced to the work zone speed limit. This also includes the taper area.
3. Lane closure area: This link represents the actual lane closure area.
4. Exit link: This link represents the exit area where the drivers are back to the basic freeway section.

Vehicles are generated from the desired traffic volume and composition and fed to the upstream link. This link is sufficiently long (about 3 miles) to give the drivers the travel distance to adjust their car-following and speeds before they reach the transition link. It was also ensured that under high volume conditions the link can handle any queues that can propagate upstream of the lane closure. The desired speed distribution for all the vehicles is the same on the basic freeway section. A normal distribution with mean speed 5 mph over the speed limit (65 mph is used in this research) and a standard deviation of 5 mph is used for assigning the desired speeds of the drivers at entry in to the network.

For passenger cars, the desired speed distribution in the transition link and lane closure area is assumed to be normal distribution with mean 5 mph over the speed limit (55 mph speed limit in the work zone) and standard deviation of 5 mph. For the heavy vehicles also, normal distribution is used but with a mean speed that is less than the mean speed of cars. The difference in speeds between cars and trucks is one of the input parameters. It should be noted that, in all the scenarios, the heavy vehicle type used was tractor-trailer and work zone has only one lane open. Also in the basecase (only-passenger car) the capacity of the work zone was approximately 2000 pcphpl .

In order to determine the delay, first the travel times for different scenarios need to be estimated. Therefore, Travel Time sections feature of VISSIM was used to obtain the travel times of each vehicle. For each scenario 30 runs were performed and the average travel times of cars and trucks through the work zone were determined. It is also required to ensure that the error in the estimate of travel time is not significant. Otherwise the reliability of estimates of the D-PCE would be diminished. Therefore, the variance of travel times of both passenger cars and trucks is monitored to ensure that the error in travel time is less than 5%. It was observed that in none of the cases the error exceeded 1.5s. Therefore 30 runs were deemed to be sufficient. Having limited the error to 5% and determining the average travel times for cars and trucks in each scenario, D-PCE is computed using equation 1.

The travel time on the regular freeway is computed by using 70 mph as the average speed (5 mph over the speed limit). It should be noted that, the highest volume considered in this research is 2000 vph for one lane of work zone. On the regular freeway this translates to 1000 vphpl. According to HCM *(5)* the speeds on basic freeway section are unaffected by volume upto a level of about 1300 vphpl. Therefore this assumption of an average speed of 70 mph on the regular freeway is reasonable. This procedure is used to compute the D-PCE values for all the scenarios in this research.

D-PCE VALUES

Effect of Traffic Volume

Using the procedure described in the previous section D-PCE values were computed for various volume levels and truck percentage combinations for a given work zone length and speed difference between cars and trucks. Figure 2 shows variation of D-PCE with traffic volume and truck percentage when the speed difference between cars and trucks is 10mph. Each line in Figure 2 corresponds to a volume level ranging from 200vph to 1200 vph in increments of 200 vph and in increments of 100 vph from 1200 vph to 1700 vph. At every truck percentage, it can be seen that the D-PCE increases as the traffic volume increases. For a given truck percentage, as the traffic volume increases the probability of a car getting queued behind a truck increases. Therefore, it is expected that the D-PCE would increase as the volume increases.

Effect of Truck Percentage

It should be noted that at every volume level, as the truck percentage increases, the D-PCE decreases. When trucks are introduced in the traffic stream, they increase the delay experienced by the vehicles. Beyond a certain threshold, adding more trucks causes trucks to queue behind trucks and not so much the cars. Therefore, the marginal increase in delay to the traffic stream due to the addition of the trucks decreases. Consequently D-PCE decreases. These trends of D-PCE are in agreement with trends reported by previous research *(5,17)*.

From Figure 2 it can also be noted that the D-PCE values are shown for truck percentages from 5% to 45% up to a volume of 1200 vph only. Beyond that volume, the D-PCE values are shown only for a subset of the truck percentages. This is because at the high volume levels, when trucks are introduced into the traffic stream, the flow breaks down much before reaching the numerical value for the basecase capacity. In this case, it should be recalled that the basecase capacity is 2000 pcphpl. In other words, with the introduction of trucks traffic breakdown occurs at a lower volume level than 2000 vehicle per hour.

In the case of 1300 vph, the traffic breaks down at a truck percentage of about 35%. Beyond this point, there is congestion. D-PCE is not defined for cases which exceed the capacity of the work zone. This is because, it is not physically possible to process so many vehicles through the work zone and consequently there is no need to find a D-PCE for those cases. It is expected that as the traffic volume increases, the traffic flow breakdown would occur at lower truck percentages. This is also depicted in Figure 2. Beyond the volume increases beyond 1300 vph, the D-PCE values are shown for fewer truck percentages. In the case of 1800 vph, the breakdown happens at 5% trucks. Therefore, the D-PCE values corresponding to these volume levels are not defined.

Discussion on D-PCE Values

The D-PCE values for a 1 mile work zone with 10 mph speed difference ranged from 2.8 to 7.7. These values of D-PCE might seem to be unreasonably high for a work zone in a level terrain. It should be noted that the speed difference between cars and trucks has a significant effect on delay and consequently on D-PCE resulting in these higher D-PCE values. These numbers are not unprecedented. It should be recalled that the work zone had only one lane open. Therefore, these D-PCE values would not be comparable with the HCM *(5)* PCE values for basic freeway sections, but the PCE values for estimating average speeds on two-lane highways with no passing may be used as a point of reference to illustrate the variation of PCE. The HCM PCE values for estimating average speeds on specific upgrades (Exhibit 20-15 from HCM) varies from 1.5 to 15.2 depending on grade, length of grade and volume. Although freeway work zone traffic and two lane highway traffic are not necessarily comparable, the range of 2.8 to 7.7 is well within the range of HCM values for two lane highways.

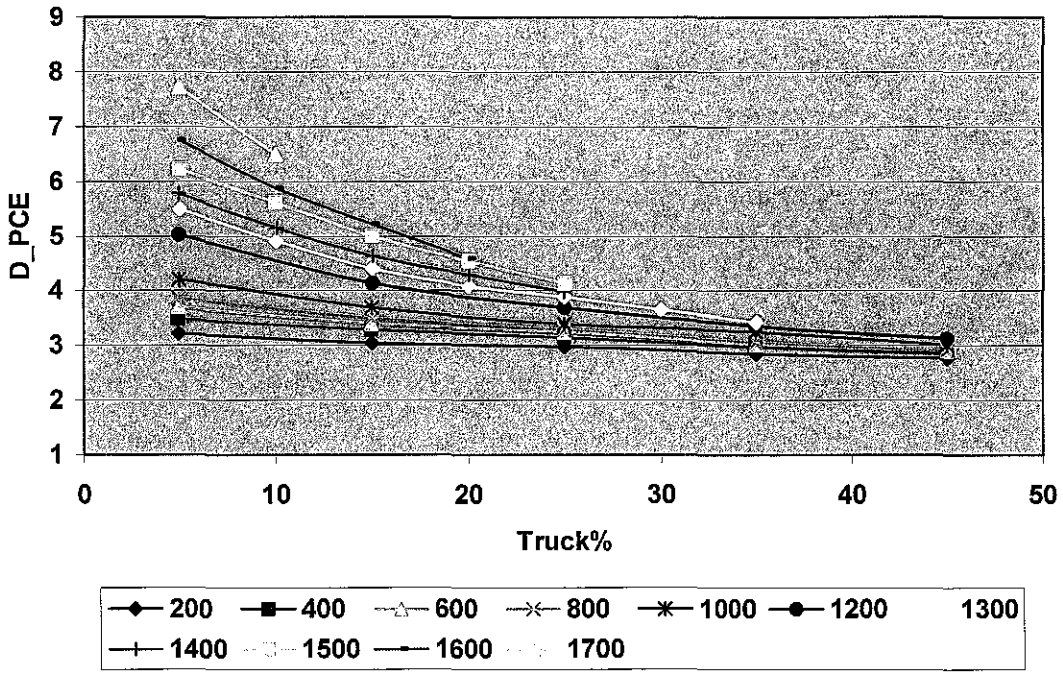

FIGURE 1 Simulated D-PCE for a 1 mile WZ with 10 mph speed difference at different volumes.

CONCLUSIONS AND RECOMMENDATIONS

This paper extended the delay-based methodology that was developed for intersections to work zones, and developed PCE values for heavy vehicles in work zones. The methodology for computing delay-based PCE of heavy vehicles in the work zones is presented. The equivalence is based on delay because delay captures the adverse effects of trucks in work zone traffic better than headway. Simulation was used to quantify the delays caused by the heavy vehicles so PCE values can be determined. Delay and consequently delay-based PCE (D-PCE) values are affected by the length of the work zone, the speed difference between cars and heavy vehicles, traffic volume, percentage trucks and other work zone factors. The D-PCE values for a 1 mile work zone with 10 mph speed difference between cars and heavy vehicles ranged from 2.8 to 7.7. The

D-PCE values decreased with increasing truck percentage and increased with increasing traffic volume. The D-PCE when there is speed difference are well within the range of PCE values of truck for estimating the average speed on two lane highways which are more similar to a one lane work zone than a basic freeway section. Further research is recommended to develop D-PCE values considering different work zone lengths and speed differences between cars and heavy vehicles. The PCE values computed in this research are for a partial closure work zone with one lane open for traffic. The methodology presented in this research can be used to compute the D-PCE values for multiple lanes of traffic and crossover work zones.

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ATTACHMENT E

Attachment E

IV. Environmental Impact Analysis

I.1 Public Services—Police Protection

1. Introduction

This section of the Draft EIR describes existing police protection services within the Project area and provides an analysis of the Project's potential impacts with regard to these services. The focus of the analysis is the Los Angeles Police Department (LAPD) facilities that currently serve the Project Site and the ability of the LAPD to provide adequate police protection services to serve the Project. This section is based on information provided by the LAPD's Community Relations Section, which is included in Appendix I of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

There are several local plans, regulations and programs that include policies, requirements, and guidelines regarding police protection services in the City of Los Angeles. As described below, these local plans and guidelines include the Los Angeles General Plan Framework, the City of Los Angeles Charter and Administrative and Municipal Codes, the West Los Angeles Community Plan, and the LAPD's Design Out Crime Guidelines.

(1) Los Angeles General Plan Framework Element

The City of Los Angeles General Plan Framework Element (General Plan Framework), adopted in December 1996 and readopted in August 2001, sets forth general guidance regarding land use issues for the entire City of Los Angeles and defines citywide policies regarding land use, including infrastructure and public services. Goal 91 of the Infrastructure and Public Services Chapter of the General Plan Framework specifies that every neighborhood have the necessary police services, facilities, equipment, and manpower required to provide for the public safety needs of that neighborhood.[1] Objective 9.13 and Policy 9.13.1 require the monitoring and reporting of police statistics and population projections for the purpose of evaluating existing and future police

[1] *The Framework Element of the Los Angeles General Plan, Chapter 9: Infrastructure and Public Services.*

protection needs. Objective 9.14 requires that adequate police services, facilities, equipment, and personnel are available to meet such needs. Further, Objective 9.15 requires police services to provide adequate public safety in emergency situations by maintaining mutual assistance agreements with other local law enforcement agencies, state law enforcement agencies, and the National Guard. The City's General Plan Safety Element recognizes that most jurisdictions rely on emergency personnel (police, fire, gas, and water) to respond to and handle emergencies.

Presently, the LAPD operates under a Computer Statistics (COMPSTAT) Plus program that implements the General Plan Framework goal of assembling statistical population and crime data to determine necessary crime prevention actions. COMPSTAT Plus is based on the COMPSTAT program that was created in 1994 by then Police Commissioner of the New York Police Department and former LAPD Chief William J. Bratton. The COMPSTAT system implements a multi-layer approach to police protection services through statistical and geographical information system analysis of growing trends in crime through its specialized crime control model. COMPSTAT Plus represents an enhanced application of the COMPSTAT principles of inspection and accountability, as well as the use of more in-depth auditing methods, mentorship, and close collaboration. By embracing COMPSTAT, Los Angeles reduced Part 1 Crimes by 4.2 percent in 2003 (homicides were reduced by 21.6 percent during this period). Use of COMPSTAT, and more recently, COMPSTAT Plus, by the LAPD has effectively and substantially reduced the occurrence of crime in Los Angeles communities. For example, for the four-week period after implementation of COMPSTAT Plus in the LAPD's Southeast Area, violent crimes were down 11 percent.[2]

(2) City of Los Angeles Charter and Administrative and Municipal Codes

The law enforcement regulations and the powers and duties of the LAPD are outlined in the City of Los Angeles Charter Article V, Section 570; the City of Los Angeles Administrative Code, Chapter 11, Section 22.240; and the Los Angeles Municipal Code (LAMC), Chapter 5, Article 2.

Article V, Section 570 of the City Charter gives the power and the duty to the LAPD to enforce the penal provisions of the Charter and City ordinances, as well as federal and State law. The Charter also gives responsibility to the officers of the LAPD to act as peace

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[2] *City of Los Angeles Police Department, COMPSTAT Plus, www.lapdonline.org/inside_the_lapd/content_basic_view/6364, accessed April 14, 2016.*

officers, as defined by state law, and the power and duty to protect lives and property in case of a disaster or public calamity.

(3) West Los Angeles Community Plan

As discussed in Section IV.G, Land Use, of this Draft EIR, the Project is located within the West Los Angeles Community Plan Area. The West Los Angeles Community Plan, adopted on July 27, 1999, includes the following objectives and policies that are relevant to police protection:

- Objective 8-1: To provide adequate police facilities, personnel and protection to correspond with existing and future population and service demands.
- Policy 8-1.1: Consult with the Police Department in the review of development projects and land use changes to determine law enforcement needs and requirements.
- Objective 8-2: To increase the ability to minimize crime and provide adequate security.
- Policy 8-2-1: Support and encourage community based crime prevention efforts (such as Neighborhood Watch) through regular interaction and coordination with existing policing, foot and bicycle patrols, watch programs and regular communication with neighborhood and civic organizations.
- Policy 8-2.2: Ensure adequate lighting around residential, commercial and industrial buildings to improve security.
- Policy 8-2.3: Ensure that landscaping around buildings does not impede visibility.

The Project's consistency with applicable policies related to police protection is analyzed in Section IV.G, Land Use, of this Draft EIR.

(4) Design Out Crime Guidelines

The City of Los Angeles has championed an initiative referred to as "Design Out Crime," which includes the techniques of Crime Prevention Through Environmental Design (CPTED). The City of Los Angeles is one of the first major cities in the nation to institutionalize these techniques into its government operations. The LAPD's Crime Prevention Unit consults with private developers to incorporate CPTED techniques into projects, and the LAPD participates in the City's Permit Processing Network, an inter-agency task force that reviews complex development projects.

CPTED includes the following three key concepts:

- Natural surveillance: The placement of physical features, activities, and people in a way that maximizes visibility.
- Natural access control: Restricting or encouraging people to come into a space through the placement of entrances, exits, fencing, landscaping, and lighting.
- Territorial reinforcement: The use of physical attributes to define ownership and separate public and private space.

b. Existing Conditions

(1) Overview of Existing LAPD Services

For the purposes of providing police protection services, the LAPD divides the City into four bureaus: the Central; West; South; and Valley Bureaus. These four bureaus are further divided into 21 service areas, which are serviced by the LAPD's 21 community police stations.[3] Within each service area, smaller geographic units referred to as Reporting Districts are used for resource deployment purposes as well as to assist in compiling statistical data. The LAPD also includes a variety of support systems including the Direct Support Division, Special Operations, Municipal Division, Special Weapons and Tactics, K-9, and Mounted Units. All geographic divisions of the Department are fully and consistently staffed according to existing needs. The determination of staffing needs is predicated upon the analysis of crime data, population density, and other specific demographic variables.

As of April 2014, the departmental staffing resources within the LAPD included 9,882 officers. Based on a total City population of 3,792,621, the LAPD currently has an officer-to-resident ratio of 2.61 officers for every 1,000 residents.[4]

The Project Site is located in the West Bureau service area, which covers a territory of approximately 124 square miles with a population of approximately 840,400 residents. The bureau oversees operations in the Hollywood, Wilshire, Pacific, Olympic, and West Los Angeles service areas, as well as the West Traffic Division, which includes the neighborhoods of Pacific Palisades, Westwood, Century City, Venice, Hancock Park, and the Miracle Mile. The West Bureau is bordered to the north by Forest Lawn Drive, to the

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[3] *City of Los Angeles Police Department, Media Relations Handbook, 2007–2008.*

[4] *City of Los Angeles Police Department, COMPSTAT Citywide Profile 03/09/14–04/05/14.*

east by Normandie Boulevard, to the south by El Segundo Boulevard, and to the west by the Pacific Ocean.[5]

(a) West Los Angeles Community Police Station

Within the West Bureau Service Area, the Project Site is served by the West Los Angeles Community Police Station located at 1663 Butler Avenue, approximately one mile southeast of the Project Site. The locations of the police and fire stations that serve the Project Site are depicted in Figure IV.I.1-1 on page IV.I.1-6. The West Los Angeles Community Police Station has a service area of approximately 64 square miles. The general service boundaries of the West Los Angeles Community Police Station are Mulholland Drive to the north, Los Angeles City boundary and the I-10 Freeway to the south, Los Angeles City boundary and La Cienega Boulevard to the east, and the Los Angeles City boundary to the west. Approximately 236 sworn officers and 12 civilian support staff are deployed within the West Los Angeles Community service area.[6] Based on the residential service population of 230,288 persons, the officer-to-resident ratio is approximately 1.02 officers per 1,000 residents.[7] As such, the officer-to-resident ratio in the West Los Angeles Community service area is lower than the citywide ratio of 2.61 officers per 1,000 residents.

The Project Site is located within Reporting District 842 of the West Los Angeles Community Police Station service area boundaries. The general service boundaries of Reporting District 842 are Wilshire Boulevard to the north, Santa Monica Boulevard to the south, Federal Avenue to the east, and Centinela Avenue to the west. Table IV.I.1-1 on page IV.I.1-7 shows a comparison of reported crime data within the West Los Angeles Community Police Station service area and citywide for 2013. As shown in Table IV.I.1-1, approximately 7,934 crimes were reported within the West Los Angeles Community Police Station service area and 187,749 crimes were reported citywide. Based on the 2013 service population, 34 crimes per 1,000 residents (0.034 crime per capita) were reported in the West Los Angeles Community Police Station service area and 50 crimes per 1,000 residents (0.05 crime per capita) were reported citywide.

Table IV.I.1-2 on page IV.I.1-8 provides a breakdown of the 2013 crime statistics for Reporting District 842, the West Los Angeles Community Police Station service area, and citywide. As shown in Table IV.I.1-2, Reporting District 842 reported 185 crimes, the West

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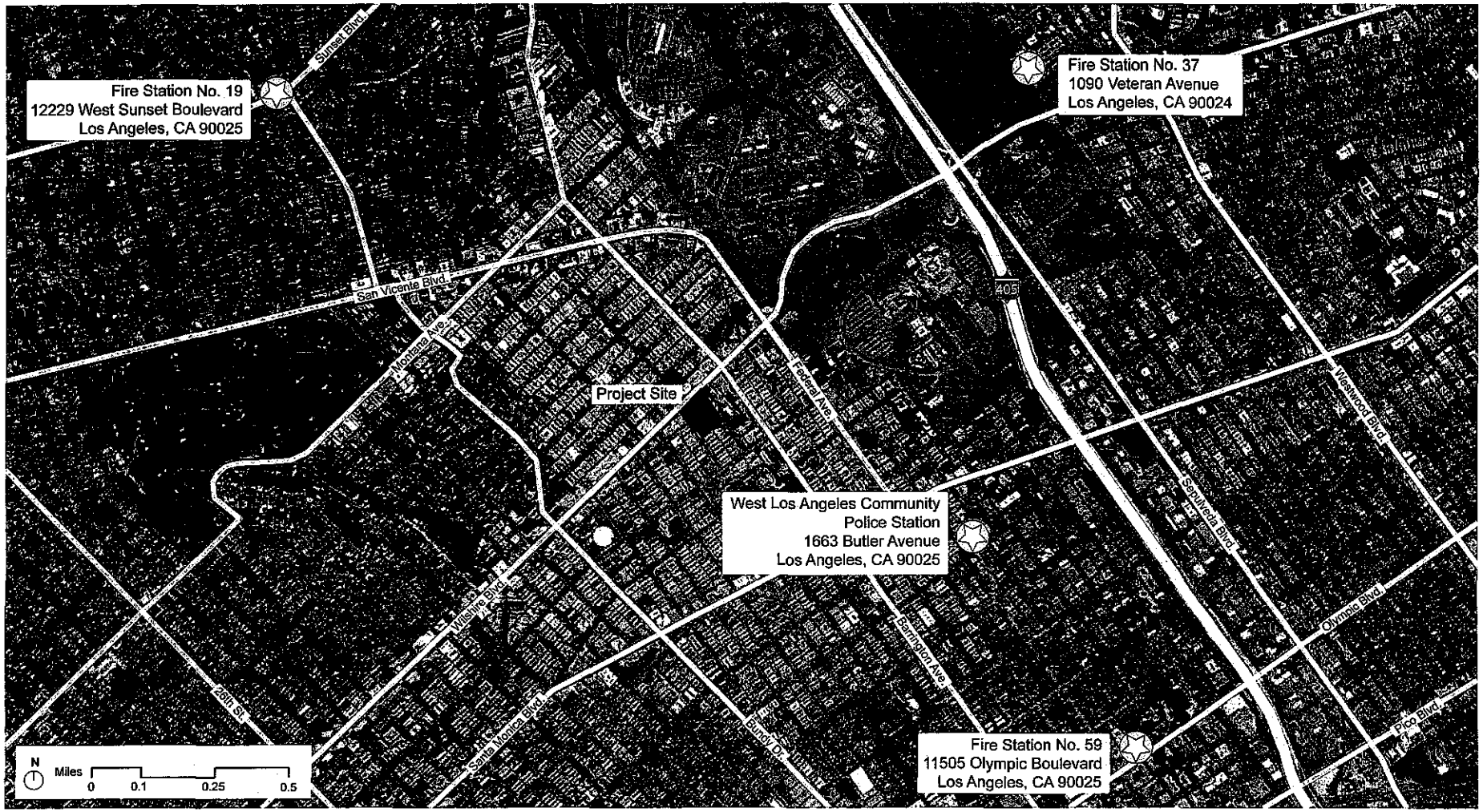
5 *City of Los Angeles Police Department, About West Bureau, www.lapdonline.org/west_bureau/content_basic_view/1869, accessed April 14, 2016.*

6 *Written correspondence from Andrew J. Smith, Commanding Officer, Media Relations and Community Affairs Group, Los Angeles Police Department, April 14, 2014. See Appendix I of this Draft EIR.*

7 *Ibid.*



eyestone ENVIRONMENTAL

Source: Google Earth Pro, 2013.

Figure IV.I.1-1
Los Angeles Police and Fire Stations that Serve the Project Site

Comment Letter 7

Table IV.I.1-1
2013 Crimes per 1,000 Persons within West Los Angeles and Citywide

Area	Crimes	Population	Crimes per 1,000 Persons
West Los Angeles Service Area	7,934	230,288	34
Citywide	187,749	3,790,185	50

Source: Written correspondence from Andrew J. Smith, Commanding Officer, Media Relations and Community Affairs Group, Los Angeles Police Department, April 14, 2014. See Appendix I of this Draft EIR.

Los Angeles Community Police Station reported 7,934 crimes, and 187,749 crimes were reported citywide. In addition, based on the number of officers deployed within the West Los Angeles Community Police Station service area (236 sworn officers), the ratio of crimes per officer was 33.6 crimes per officer in comparison to the citywide ratio of 19.0 crimes per officer (187,749 crimes per 9,882 officers). Thus, in addition to having a lower officer-per-resident ratio, the West Los Angeles Community Police Station service area also has a higher crime per officer ratio compared to the citywide ratios. Additionally, the average response time to emergency calls for service in the West Los Angeles area during 2013 was 7.2 minutes, which was higher than the citywide average of 5.9 minutes and the set standard response time of 7 minutes.[8] As noted above, the West Los Angeles Community Police Station is located approximately one mile southeast of the Project Site.

3. Project Impacts

a. Methodology

According to the *L.A. City CEQA Thresholds Guide*, police service demand relates to the size and characteristics of the community, population, the geographic area served, and the number and the type of calls for service. Changes in these factors resulting from a project may affect the demand for services. As such, the determination of significance relative to impacts on police services is based on the evaluation of existing police services for the police station(s) serving the Project Site, including the availability of police personnel to serve the estimated Project population. The analysis presents statistical averages associated with the police station serving the Project Site and citywide services. The determination of impact on the capability of existing police services and personnel is based

[8] *Written correspondence from Andrew J. Smith, Commanding Officer, Media Relations and Community Affairs Group, Los Angeles Police Department, April 14, 2014. See Appendix I of this Draft EIR.*

Table IV.I.1-2
2013 Crime Totals—Reporting District 842, West Los Angeles Service Area and Citywide

Types of Crime	Reporting District 842	West Los Angeles	Citywide
Murder	0	3	251
Rape	0	24	665
Robbery	2	134	7,861
Aggravated Assault	3	155	7,592
Burglary	12	927	15,572
Larceny	83	3,036	55,120
Vehicle Theft	11	343	14,112
Other Assault	21	927	30,818
Forgery/Counterfeit	2	175	2,683
Fraud	13	672	12,788
Embezzlement	0	60	726
Vandalism	19	702	17,971
Weapon	0	29	1,135
Pimping/Pandering	0	1	66
Other Sex Offenses	3	73	2,833
Against Family Child	0	5	515
Disorderly Conduct	0	21	345
Vagrancy	3	99	1,677
All Other Violations	13	548	15,019
Total	**185**	**7,934**	**187,749**

Source: Written correspondence from Andrew J. Smith, Commanding Officer, Media Relations and Community Affairs Group, Los Angeles Police Department, April 14, 2014. See Appendix I of this Draft EIR.

on the potential for the annual crimes per resident in the West Los Angeles Service Area to exceed current averages due to the addition of the Project. Project design features and additional mitigation measures that would reduce the impact of the Project on police services are also described as mitigating factors in the determination of any unavoidable impact.

b. Thresholds of Significance

Appendix G of the CEQA Guidelines provides a sample question that addresses impacts with regard to police protection service. This question is as follows:

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

The *L.A. City CEQA Thresholds Guide* states that the determination of significance shall be made on a case-by-case basis, considering the following factors:

- The population increase resulting from the proposed project, based on the net increase of residential units or square footage of non-residential floor area;
- The demand for police services anticipated at the time of project buildout compared to the expected level of service available. Consider as applicable, scheduled improvements to LAPD services (facilities, equipment, and officers) and the project's proportional contribution to the demand; and
- Whether the project includes security and/or design features that would reduce the demand for police services.

Based on the above factors, the Project would have a significant impact on police services if:

- The Project would generate a demand for additional police protection services that would substantially exceed the capability of the LAPD to serve the Project Site, and/or
- The Project would cause a substantial increase in emergency response times as a result of increased traffic congestion attributable to the Project.

c. Regulatory Compliance and Project Design Features

(1) Regulatory Compliance

The Project would comply with all applicable requirements set forth by the LAPD.

(2) Project Design Features

The following project design features are proposed with regard to police protection:

Project Design Feature I.1-1: During construction, the Project Applicant shall implement temporary security measures including security fencing, lighting, and locked entry.

Project Design Feature I.1-2: During operation, the Project shall include private on-site security, a closed circuit security camera system, and keycard entry for the residential building and the residential parking areas.

Project Design Feature I.1-3: The Project shall provide sufficient lighting of building entries and walkways to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings.

Project Design Feature I.1-4: The Project shall provide sufficient lighting of parking areas to maximize visibility and reduce areas of concealment.

Project Design Feature I.1-5: Prior to the approval of plans, the Project Applicant shall submit a diagram of the Project Site to the Los Angeles Police Department West Bureau Commanding Officer that includes access routes and any additional information that might facilitate police response.

Additionally, pursuant to Project Design Feature H-5 in Section IV.H, Noise, of this Draft EIR, the pedestrian access gates to the proposed open space area in the northeast corner of the Project Site would be closed and locked to prohibit public access to the area from approximately sunset until 8:00 A.M. each day.

d. Analysis of Project Impacts

(1) Construction

Construction sites can be sources of nuisances and hazards and invite theft and vandalism. When not properly secured, construction sites can contribute to a temporary increased demand for police protection services. Pursuant to Project Design Feature I.1-1, the Project Applicant would implement temporary security measures including security fencing, lighting, and locked entry to secure the Project Site during construction. With implementation of these measures, potential impacts associated with theft and vandalism during construction activities would be less than significant.

Project construction activities could also potentially impact the surrounding roadways and LAPD protection services and police response times in the Project . As discussed in Section IV.J, Traffic, Access, and Parking, of this Draft EIR, access to the Project Site and the surrounding vicinity could be impacted by Project-related construction activities, such as temporary lane closures, roadway/access improvements, utility line construction, and the generation of traffic as a result of construction equipment movement, hauling of soil and construction materials to and from the Project Site, and construction worker traffic. Although construction activities would be short-term and temporary for the

area, Project construction activities could increase response time for police vehicles along Wilshire Boulevard and main connectors due to travel time delays caused by traffic during the construction phase. However, as discussed in Section IV.J, Traffic, Access, and Parking, of this Draft EIR, most, if not all, of the construction worker and haul truck trips would occur outside the typical weekday commuter morning and afternoon peak periods, reducing the potential for traffic-related conflicts. In addition, a construction management plan would be implemented during Project construction pursuant to Project Design Feature J-1 in Section IV.J, Traffic, Access, and Parking, to ensure that adequate and safe access is available within and near the Project Site during construction activities. Features of the construction management plan would be developed in consultation with the Los Angeles Department of Transportation (LADOT) and may include limiting potential lane closures to off-peak travel periods, to the extent feasible, and scheduling the receipt of construction materials during non-peak travel periods. Appropriate construction traffic control measures (e.g., signs, delineators, etc.) would also be implemented to ensure emergency access to the Project Site and traffic flow is maintained on adjacent right-of-ways. In addition, construction-related traffic generated by the Project would not significantly impact LAPD response times within the Project vicinity as emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic.

Implementation of the project design features above and the construction management plan (Project Design Feature J-1 in Section IV.J, Traffic, Access, and Parking, of this Draft EIR) would ensure that Project construction activities would not result in a demand for additional police protection services that would substantially exceed the capability of the LAPD to serve the Project Site, and that Project construction would not cause a substantial increase in emergency response times as a result of increased traffic congestion. Therefore, impacts on police protection services during Project construction would be less than significant.

(2) Operation

The Project Site is served by the West Los Angeles Community Police Station located at 1663 Butler Avenue, approximately 1 mile southeast of the Project Site. The Project would introduce a new residential and visitor population to the Project Site and increase the service population of the West Los Angeles Community Police Station service area. The West Los Angeles Community Police Station service area is supported by 236 sworn officers and a 12-person civilian support staff. As shown in Table IV.I.1-3 on page IV.I.1-12, the Project's estimated net police service population would be 1,015 persons, which would increase the existing service population of the West Los Angeles Community Police Station service area from 230,288 persons to 231,303 persons. The officer-per-resident ratio would remain at its current level of 1.02 officers per

Table IV.I.1-3
Estimated Project Service Population to the West Los Angeles Community Police Station Service Area

Land Use	Units	Conversion Factor (persons/unit)[a]	Total Police Service Population
Existing			
Supermarket (to be removed)	42,900 sf	0.003	129
Office (to remain)	357,100 sf	0.004	1,428
Subtotal Existing			*1,557*
Proposed			
Residential (dwelling units)	376 du	3	1,128
Residential Amenities (lounge, fitness center, recreation room, bicycle storage)	5,410 sf	0.003	16
Subtotal Proposed			*1,144*
Total Police Service Population (Proposed + Existing to Remain)			**2,572**
Project Net Police Service Population (Proposed – Existing to be Removed)			**1,015**
Project Generated Crimes[b]			**35**

du = dwelling units

sf = square feet

[a] *The following L.A. City CEQA Thresholds Guide, K. Police Service Population Conversion Factors were used: Residential (single, one-, and two-bedroom units): 3 persons/unit; Office: 4 persons/1,000 sf. As discussed in the Initial Study prepared for the Project, which is included in Appendix A of this Draft EIR, the Project's new residential units would introduce an estimated residential population of 703 persons according to the City of Los Angeles Demographic Research Unit's most recent estimated household size for renter-occupied units in the Community Plan area (1.87 persons per unit). However, Section K. Police Service Population Conversion Factors in the L.A. City CEQA Thresholds Guide also provides police service population factors for residential uses. Based on that factor (Residential [single, one-, and two-bedroom units]: 3 persons/unit), full buildout of the proposed residential uses would generate a police service population of approximately 1,128 persons. Note that the resulting residential population is greater than the calculation included in the Initial Study prepared for the Project. The higher police service population for the proposed residential uses (which is based on the police service population factors in the L.A. City CEQA Thresholds Guide) is used for purposes of providing a conservative analysis of impacts on police services provided by the West Los Angeles Community Police Station.*

[b] *According to the LAPD, the crimes per capita rate for the West Los Angeles Community Police Station service area was 0.034 crimes per capita in 2013. This generation factor was used to generate the approximate net increase in crimes that could occur at the Project Site with implementation of the Project.*

Source: Eyestone Environmental, 2016.

1,000 residents, however. Therefore, the Project would not represent a significant change in the officer-per-resident ratio of the West Los Angeles Community Police Station service area.

As shown in Table IV.I.1-1 on page IV.I.1-7, 7,934 crimes were reported in the West Los Angeles Community Police Station for 2013, which resulted in a crime rate of approximately 34 crimes per 1,000 residents or 0.034 crime per capita. Based on the assumption that the annual crime rate would remain constant at 0.034 crime per capita, the Project could potentially generate approximately 35 new crimes per year. This would increase the annual number of crimes reported in the West Los Angeles Community Police Station service area from 7,934 to 7,969 reported crimes per year, a 0.4 percent increase.

As shown in Table IV.I.1-2 on page IV.I.1-8, the most common crimes reported in Reporting District 842 were larceny, non-aggravated assaults, and burglary. The Project would implement Project Design Feature I.1-2, which would include on-site security features such as keycard entry for the proposed residential tower and within the proposed parking structure as well as private on-site security, and a closed circuit security camera system. Additionally, pursuant to Project Design Features I.1-3 and I.1-4, the Project would include appropriate lighting to ensure security and well-lit areas. Pursuant to Project Design Feature I.1-5, the Project Applicant would submit a diagram of the Project Site to the LAPD West Bureau Commanding Officer that includes access routes and any additional information that might facilitate police response. In addition, according to Project Design Feature H-5 in Section IV.H, Noise, of this Draft EIR, the pedestrian access gates to the proposed open space area in the northeast corner of the Project Site would be closed and locked to prohibit public access to the area from approximately sunset until 8:00 A.M. each day. The Project's design features would help offset the Project-related increase in demand for police services. Implementation of these measures would integrate CPTED strategies that would create high-visibility areas, and deter criminal activities.

However, even with the implementation of the project design features, the officer-to-resident ratio of the West Los Angeles Community Police Station service area would still be below the citywide ratio, and the response time still would be above the LAPD set standard time of 7 minutes. As such, the LAPD has stated that the Project would have the potential to result in a significant impact on police services.[9] Therefore, the Project could generate a demand for additional police protection services that would substantially exceed the capability of the LAPD to serve the Project Site. As such, impacts to police protection

[9] *Written correspondence from Andrew J. Smith, Commanding Officer, Media Relations and Community Affairs Group, Los Angeles Police Department, April 14, 2014. See Appendix I of this Draft EIR.*

services would be potentially significant and mitigation is required, discussed below in Section 5, Mitigation Measures.

4. Cumulative Impacts

As shown in Section III, Environmental Settings, of this Draft EIR, a total of 26 related projects have been identified within the Project vicinity, all of which fall within the service boundaries of the West Los Angeles Community Police Station service area except Related Project Nos. 5, 20, 21, 22, 23, and 24. A map of the related project locations is provided in Figure III-1 in Section III, Environmental Settings, of this Draft EIR.

In general, impacts to LAPD services and facilities during the construction of each related project would be addressed as part of each related project's development review process conducted by the City. Due to the proximity to the Project Site, should Project construction occur concurrently with the construction of Related Project Nos. 6 and 7 (located approximately four blocks west and three blocks east of the Project Site on Wilshire Boulevard, respectively), then specific coordination among these multiple construction sites would be required and implemented through the Project's construction management plan, which would ensure emergency access and traffic flow is maintained on adjacent right-of-ways. In addition, construction-related traffic generated by the Project and the related projects would not significantly impact LAPD response times within the Project vicinity as emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, the Project's contribution to cumulative impacts on emergency response would not be cumulatively considerable.

As shown in Table IV.I.1-4 on page IV.I.1-15, based on the police service population factors provided in the *L.A. City CEQA Thresholds Guide,* the related projects would generate a population increase of approximately 13,842 persons within the service area of the West Los Angeles Community Police Station. As previously discussed, the Project would generate approximately 1,015 persons within the service area. Combined with the related projects, a cumulative total service population increase of 14,857 persons would occur. Utilizing the West Los Angeles Police Station service area crimes per capita rate of 0.034 crime per capita, the Project could result in 35 additional crimes per year and related projects could result in 473 additional crimes per year, for a total of 508 additional crimes per year within the West Los Angeles Community Police Station service area. The Project would represent approximately eight percent of the cumulative increase in potential crimes. This degree of cumulative growth would substantially increase the demand for LAPD services in the West Los Angeles Community Police Station service area. However, as previously discussed, although the Project would not decrease the current officer-to-resident ratio in the West Los Angeles Community Police Station service area, the LAPD

Table IV.I.1-4
Estimated Service Population from Related Projects within West Los Angeles Community Police Station Service Area

No.[a]	Project Name	Land Use	Number of Units	Conversion Factor[b]	Total Population	Crimes[c]
1	Brentwood Town Green	Retail	26,582 sf	0.003	80	3
		Restaurant	13,556 sf	0.004[e]	54	2
2	Restaurant	Restaurant	3,900 sf	0.004[e]	16	1
3	Brentwood School	Private School	265 stu	—[d]	265	9
4	Archer School for Girls	Private School	88 persons[f]	—[d]	88	3
6	The Picasso	Apartments	108 du	4	432	15
		Retail	13,000 sf	0.003	39	1
7	Office Building	Office	120,200 sf	0.004	481	16
		Medical Office	120,900 sf	0.004	484	16
8	Condominium & Retail	Condominium	93 du	4	372	13
		Retail	26,000 sf	0.003	78	3
9	Condominium & Retail	Condominium	28 du	4	112	4
		Retail	4,700 sf	0.003	14	0
10	Hudson Pacific	Office	250,283 sf	0.004	1,001	34
11	Fast Food	Fast Food Restaurant	1,200 sf	0.004[e]	5	0
12	Santa Monica & Barrington Mixed-Use	Supermarket	55,430 sf	0.003	166	6
		Apartments	166 du	4	664	23
13	New West Charter School	Charter School	875 stu	—[d]	875	30
14	Hyde Park Condominiums	Condominium	95 du	4	380	13
15	Wildwood Upper School	Private School	500 stu	—[d]	500	17
16	Westwood Hotel	Hotel	134 rm	1.5	201	7
		Condominium	10 du	4	40	1
		Commercial	16,500 sf	0.003	50	2
17	Mixed-Use Apartment & Restaurant	Apartments	52 du	4	208	7
		Restaurant	3,300 sf	0.004[e]	13	0
18	Mixed-Use	Apartments	89 du	4	356	12
		Specialty Retail	6,030 sf	0.003	18	1
19	Pico-Sepulveda Mixed-Use	Apartments	538 du	4	2,152	73
		Discount Store	212,000 sf	0.003	636	22
		Supermarket	54,000 sf	0.003	162	6
25	Martin Expo Town Center Project	Residential	516 du	4	2,064	70
		Retail	67,000 sf	0.003	201	7
		Creative Office	200,000 sf	0.004	800	27
26	Mixed-Use	Residential	175 du	4	700	24
		Retail	45,000 sf	0.003	135	5
Related Projects Total					**13,842**	**473**
Project Net Impact					**1,015**	**35**
Related Projects plus Project					**14,857**	**508**

Table IV.I.1-4 (Continued)
Estimated Service Population from Related Projects within
West Los Angeles Community Police Station Service Area

No.[a]	Project Name	Land Use	Number of Units	Conversion Factor[b]	Total Population	Crimes[c]

sf = square feet

du = dwelling units

stu = students

rm = rooms

Related Projects Nos. 5 20, 21, 22, 23, and 24 are not included in this analysis of cumulative impacts to police protection services as they are not located within the West Los Angeles Community Police Station's service area.

[a] *Map No. corresponds to Table III-1, List of Related Projects, and Figure III-1, in Section III., Environmental Setting, of this Draft EIR.*

[b] *The following L.A. City CEQA Thresholds Guide Police Service Population Conversion Factors were used: Residential (three-,four-bedroom units): 4 persons/unit (the highest rate available); Office: 4 persons/1,000 sf; Retail: 3 persons/1,000 sf; Hotel: 1.5 persons/room/day*

[c] *According to the LAPD, the crimes per capita rate for the West Los Angeles Community Police Station service area was 0.034 crimes per capita in 2013. This generation factor was used to generate the approximate number of crimes that could occur as a result of the related projects.*

[d] *The L.A. City CEQA Thresholds Guide does not provide a police service population factor for schools. Therefore, the police service population is assumed to be equivalent to the number of students.*

[e] *The L.A. City CEQA Thresholds Guide does not provide a population conversion factor for this type of land use, therefore, the highest available rate for non-residential land uses (i.e., 4 persons per 1,000 square feet for office uses) is used.*

[f] *Estimated daytime service population (including staff and students) according to City of Los Angeles Department of City Planning, Final Environmental Impact Report, Archer Forward: Campus Preservation and Improvement Plan, State Clearinghouse Number: 2012011001, November 2014.*

Source: Eyestone Environmental, 2016.

has indicated that the Project would have a significant impact on police protection services. In addition to Project Design Features I.1-1 through I.1-5, the Project would implement Mitigation Measure I.1-1, which would reduce Project-level impacts to a less-than-significant level.

Furthermore, the Project Site and the related projects are located within a highly urbanized area and it is assumed each of the related projects identified would likewise be developed within an acceptable distance from one or more existing police stations. Similar to the Project, each related project would be subject to the City of Los Angeles' routine construction permitting process, which includes a review by the LAPD to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services. The LAPD would continue to monitor population growth and land development throughout the City and identify additional resource needs including staffing, equipment, vehicles, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. Through the City's regular budgeting efforts, the LAPD's resource needs would be identified and monies allocated

according to the priorities at the time. In addition, it is anticipated that the related projects would implement mitigation measures similar to Mitigation Measure I.1-1, which would reduce cumulative impacts to police protection services.

Based on the above, the Project's contribution to cumulative impacts to police protection services would not be cumulatively considerable and, as such, cumulative impacts on police protection services would be less than significant.

5. Mitigation Measures

Mitigation Measure I.1-1: Prior to the issuance of a building permit, the Project Applicant shall consult with the Los Angeles Police Department's Crime Prevention Unit regarding the incorporation of crime prevention features appropriate for the design of the Project, including applicable features in the Los Angeles Police Department's Design Out Crime Guidelines.

6. Level of Significance After Mitigation

The mitigation measure would implement the LAPD's recommendations for the Project and reduce Project-level impacts to police protection services to a less-than-significant level. While the Project's contribution to cumulative impacts to police protection services would not be cumulatively considerable, implementation of Mitigation Measure I.1-1 would further reduce cumulative impacts.

Written Comment Form

Use the space below to comment on areas of concern regarding the scope and content of the Draft EIR.

ENVIRONMENTAL ISSUES & IMPACTS

CEQA requires consideration of the following topics:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Geology/Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology/Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population/Housing
- Public Services
- Recreation
- Traffic/Transportation
- Utilities/Service Systems

Will cause too much more Pollution. Terrible traffic already too much Pollution, Dust & Noise from 3 yrs. Construction will be intolerable. I have Asthma & won't be able to breathe in my own home 8-1

With years of oil wells here, could create a disaster, explosion or land sinking into emptied oil removed space under bldg. Too much traffic & Not sufficient parking now, Construction Parking + 20 stories more parking for visitors & customers of Restaurant & market will make a more horrible traffic & parking & pollution Problem; Presently we have a lack of water problem 20 to 22 stories more of tenants, market & restaurant will use more water when already have a Huge Shortage of Water for present Los Angeles residents. Construction Noise pollution will drive us crazy living here Now (Owners). We are already Overpopulated. Traffic is Horrible now. Construction vehicles will make it Much Worse. Do NOT give Carlisa a permission to build over 4 stories. Do NOT under any conditions permit him to build 20 or 22 stories at 3332 La Cienega Blvd., Los Angeles, Ca., 90048 NO Variance 8-2 8-3 8-4 8-5 8-6

CONTACT INFORMATION (Optional, please print clearly)

Name: Nina Diamante Representing Agency or Organization: _____

Address: 321 S. San Vicente Blvd. #402 City/State/Zip: Los Angeles, CA. 90048

Note: Any identifying information provided will become part of the public record and, as such, must be released to any individual upon request.

Comment Letter 8

---------- Forwarded message ----------
From: <annchayman@aol.com>
Date: Tue, May 24, 2016 at 3:33 PM
Subject: STRONG OPPOSITION TO THE 333 LA CIENEGA CARUSO PROJECT
To: alejandro.huerta@lacity.org
Cc: paul.koretz@lacity.org, faisal.alserri@lacity.org

Ms. Huerta:

ENV-2015-897-EIR **State Clearinghouse Number 201601106**

Council District: 5 — Paul Koretz **Community Plan Area: Wilshire Community Plan Area**

Project Location: 333 S. La Cienega Boulevard; Los Angeles, California 90048

It is the height of arrogance that Mr. Caruso would propose such an oversized project at an intersection that he knows is already overly congested and has other major problems.

I cannot believe that the Planning Dept. would consider approving a 20 story high rise on the former Loehmann's parcel at La Cienega-San Vicente-Burton Way.This is already a terribly over congested intersection, as it stands right now, without any new construction. I was born and raised in Los Angeles in this neighborhood and I have seen over time how increasingly long it takes to get through this intersection. 9-1

Also, this is an outsized building/project which will tower over the rest of the neighborhood buildings and will block out sunlight to adjacent buildings. 9-2

This oversized project will put even more of a burden on aged and overloaded infrastructure. 9-3

There is also a lack of green space; there is too small green space planned for the corner of the property which is not for public use, only for tenants. 9-4

For all the above reasons, I strongly request that you reject this project.

Thank you.

Ann C. Hayman
1623 Greenfield Ave. Unit 3
Los Angeles, CA 90025
310-445-5929

Project Description: CRM Properties, the Applicant, proposes to develop a 1.15-acre site with a mixed-use, up to 20-story building (proposed project) with a total floor area of 294,294 square feet (sf) consisting of 145 residential units and 31,055 sf of commercial uses: a 27,685 sf grocery market and 3,370 sf of restaurant space. The proposed structure would be approximately 240 feet in height and provide a 6:1 floor area ratio (FAR). The project would include a ground level with 3,923 sf of residential lobby space and 22,436 sf commercial (retail and restaurant) space; a mezzanine level with 8,619 sf of commercial (retail and restaurant) uses and 3,516 sf of residential lobby space; 145 residential units (Levels 5 through 19); and one level with amenities such as a pool, gym, spa, and lounge (Level 20). There would be approximately 26,862 sf of usable common and private open space. The proposed project would provide 362 parking spaces, including 119 parking spaces for commercial uses in a two level subterranean parking garage, 218 parking spaces for residential uses, in an aboveground enclosed garage on Levels 2 through 4, and 25 spaces reserved for use by the mixed-use development at 8500 Burton Way as required by Condition No. 11 in Ordinance 180766.

Permits and Approvals: The proposed project would require a Vesting Zone and Height District Change from C2-1VL-O (Commercial, Height District 1VL, Oil Drilling District) to C2-2-O, pursuant to LAMC Section 12.32, to change the Height District from 1VL to Height District 2 to allow for the construction of a 240-foot building, and a General Plan Amendment (GPA), pursuant to LAMC Section 11.5.6.A, to change the land use designation from Neighborhood Office Commercial to Regional Center Commercial which would allow for the proposed height, density, and floor area ratio of the new structure. The proposed project would also require a Site Plan Review, pursuant to LAMC Section 16.05.C.1.b, for construction of a mixed-use development with a maximum of 145 residential units; a Variance, pursuant to LAMC Section 12.27, to allow alternative locations for long-term bicycle parking within the building; a Vesting Tract Map, pursuant to LAMC Section 17.15, for the merger and resubdivision of the project site to create five lots; and a Master Conditional Use Permit to allow onsite and offsite sale of alcoholic beverages in conjunction with a proposed grocery store and full service restaurant.

Anticipated Significant Environmental Effects: Significant and unavoidable Project impacts have been identified with regard to construction noise. Other issues addressed in the Draft Environmental Impact Report (EIR) include: aesthetics, land use, noise, and transportation and traffic. With implementation of mitigation measures, no significant and unavoidable project or cumulative impacts associated with these environmental topics are expected.

Document Review and Comment: If you wish to review a print copy of the Draft EIR or the documents referenced in the Draft EIR, you may do so by appointment, between the hours of 8:00 A.M. and 4:00 P.M., at the City of Los Angeles Department of City Planning at 200 North Spring Street, Room 750, Los Angeles, CA 90012. The Draft EIR is also available online at the Department of City Planning's website [http://planning.lacity.org (click on "Environmental Review" and then "Draft EIR")]. The Draft EIR can be purchased on CD-ROM for $7.50 per copy. Contact Alejandro Huerta of the City of Los Angeles at (213) 978-1454 to purchase a copy. The Draft EIR is also available on CD-ROM at the following libraries:

1. Central Library — 630 West Fifth Street, Los Angeles, CA 90071
2. Frances H.G. Hollywood Regional Library — 1623 North Ivar Avenue, Los Angeles, CA 90025
3. Fairfax Branch Library — 161 South Gardner Street, Los Angeles, CA 90028

Comment Review Period: The review period for the Draft EIR begins on May 19, 2016, and ends on July 5, 2016. If you wish to submit comments regarding the Draft EIR, please reference the file

number above and submit them in writing by 4:00 P.M. on July 5, 2016.

Please direct your comments to:

Alejandro A. Huerta
Major Projects & Environmental Analysis
Department of City Planning City Hall
City of Los Angeles
200 N. Spring Street, Room 750
Los Angeles, CA 90012
E-mail: alejandro.huerta@lacity.org
=

Comment Letter 10

---------- Forwarded message ----------
From: **Toby Horn** <thorn626@gmail.com>
Date: Tue, May 24, 2016 at 4:21 PM
Subject: 333 South La Cienega
To: alejandro.huerta@lacity.org
Cc: faisal.alserri@lacity.org, Paul Koretz <paul.koretz@lacity.org>, John Darnell <john.darnell@lacity.org>

ENV-2015-897-EIR

State Clearinghouse Number: 201601106

Dear Mr. Huerta:

I am voicing and request that my grave concerns be noted in the record over the proposed project at 333 South La Cienega in Los Angeles 90048.

To propose such an intrusive and outsized project to loom over an adjacent low rise residential neighborhood is unconscionable. The environmental effects of blocking sun and creating unnatural shade and wind patterns around this relatively open space will provide no benefit to the neighborhood. 10-1

The "green space" proposed for the corner of the parcel is to be designated for use primarily for residents and customers of the ground floor retail , yet returns NOTHING to the two communities whose quality of life will be abjectly affected by the proposed behemoth. Even adding a second story next to a one story home negatively affects the greenery, light and cross ventilation of the smaller home, what will be in store for the residents of Burton Way and Beverly Grove who live close by? What about the effects on the parishioners at the church next door? 10-2

Not much more can be said about the impassable traffic that this neighborhood is famous for. We have seen countless times how traffic engineers and consultants attempt to lead the community down a garden path by quoting a specious number of vehicle trips that they say will not affect local traffic.To this I say Hooey! If I pay someone to say something, they darned well better say it, or they don't get paid.
Now with the Beverly Center remodel, traffic will increase exponentially at this intersection. As it is now, cars attempting to reach the Beverly Center back up all the way south, almost to Wilshire during busy shopping times. 10-3

Is the Councilperson going to upgrade and replace the already strained infrastructure in this area? Will 90+ year old sewers, electrical and gas systems accommodate a 20 story building PLUS the additional burden of a grocery store and restaurants? No they will not.

I could go on, but I know you work an eight hour day and do not have the time to read more of my concerns, so I will end by reiterating that I AM STRONGLY OPPOSED TO THE PROJECT PROPOSED FOR 333 SOUTH LA CIENEGA. Let Mr. Caruso rehab the existing former Loehmann's building and lease it out. 10-4

Thank you,

Toby Horn
146 South Fuller Avenue 90036
(323)934-5611
thorn626@gmail.com

---------- Forwarded message ----------
From: **Josh Rudoy** <joshgrudoy@gmail.com>
Date: Tue, May 31, 2016 at 8:53 AM
Subject: 333 La Cienega Project - Please approve
To: Alejandro.huerta@lacity.org, john.darnell@lacity.org, paul.koretz@lacity.org

Dear City of Los Angeles and Councilman Koretz:

My name is Joshua Rudoy. This email is to express me and my family's support for the proposed residential and grocery store project proposed at 333 S. La Cienega. I both live and work in the 5th Council District. My wife and I own our home at 419 N. Kilkea Avenue where we are raising our two children. I am also an active member of the Wilshire Rotary Club.

The future of our city and my neighborhood is very important to us. In the past few years, we've seen the worst. My son plays AYSO soccer in the run down Pan Pacific Park and we have watched great old homes on our street torn down and replaced by McMansions. I drive by outdated mini-mall after mini-mall on my way to work in Century City. It's ugly and sad. But, I have also seen great things happen over the past decade such as the growth of 3rd Street and La Brea into a vibrant restaurant and food corridors and the improvements at LACMA and our other local museums. We've also enjoyed the success of The Grove, where my family and I visit regularly.

That brings me to 333 La Cienega. Last fall, the Wilshire Rotary Club enjoyed a presentation by Caruso Affiliated updating us on the Grove along with plans for future projects including in Pacific Palisades and here on La Cienega. Many of us were very impressed with the plan to tear down the tired, old Loehmman's center and build stunning modern residential building. What struck me was the opportunity to turn this uninspiring part of La Cienega into something far more special while embracing smart, transit oriented growth exactly where it is most needed. We are in a housing crisis. The solution is to build more housing. Period. The best way to do so by locating taller, mixed-use building along commercial corridors, like La Cienega.

I heard the project is now under consideration and located the environmental report on the Planning Department's website. I am sure there will be "no growth" opponents who will loudly oppose this and similar projects. They do not represent me, my family, and many of my neighbors. We are looking forward towards the city's future. In my opinion, no growth is not an option. The right growth in the right locations is what we need to champion. That's the future. I hope you will approve this project and others like it that represent where we must go as a city and a neighborhood.

11-1

Sincerely,

Joshua Rudoy
419 N. Kilkea Avenue

Comment Letter 12

---------- Forwarded message ----------
From: **Susan Hanasab** <christmasgiftscom@gmail.com>
Date: Mon, Jun 6, 2016 at 1:34 AM
Subject: Fwd: FYI - Developers Get Rich at Your Expense: Rick Caruso's Flying Cruise Ship
To: Alejandro Huerta <Alejandro.Huerta@lacity.org>

Hi Alejandro, I was wondering if you have seen this article below. What are your thoughts on this please.

12-1

Developers Get Rich at Your Expense: Rick Caruso's Flying Cruise Ship

http://2preservela.org/rick-carusos-flying-cruise-ship/

For years, L.A.’s billionaire real estate developer Rick Caruso has shelled out hundreds of thousands of dollars to lobbying firms and L.A. City Council and mayoral candidates. To get approval for his massive, opulent projects such as The Grove and Waterside at Marina Del Rey, Caruso needed buy-in from City Hall. Now he’s seeking to build a luxury high-rise, “333 La Cienega,” replacing the old Loehmann’s next to the Beverly Center, where traffic and congestion create one of SoCal’s most gridlocked and unpleasant intersections.

Resembling a cruise ship plopped on top of a big building, the 20-story, $155-million mega-project is overwhelming. For obvious reasons, it is not allowed by the zoning in that area.

But that probably won't matter. Caruso has made pals at L.A. City Hall. Between 2000 and 2016, according to L.A. City Ethics Commission filings, Caruso and his associates at Caruso Affiliated Holdings, laid out $123,600 in campaign contributions to 42 L.A. political candidates.

Caruso and company have also shelled out $295,218.75 to three lobbyist firms, just since 2007, to assure privileged access to the Planning Department, Building and Safety Department, Mayor's Office and City Council.

The money goes into City Hall, and the favors come out.

Between 2000 and 2016, Caruso, a City Hall insider who gets appointed to city commissions by politicians, has written checks totaling $65,750 to L.A. elected officials such as ex-city council member Tom LaBonge ($4,500), Mayor Eric Garcetti ($2,900) and council members Jose Huizar ($2,200) and Paul Koretz ($2,200). Caruso's employees and associates have chipped in quite a bit more.

Caruso is merely tapping the broken rules that create massive traffic jams and ignore the overwhelmed city infrastructure: lay out money for City Hall campaign contributions and lobbyist fees, and pour cash into city officials' pet projects. In return, a developer gets "rezoning" of the land, a political decision that is often worth millions and millions of dollars.

For a $3.5-billion real estate mogul like Caruso, the checks he personally wrote for $65,750 don't even add up to the cost of a supercharged Range Rover.

Caruso's "333 La Cienega," which is targeted for construction on property at San Vicente Boulevard, Third Street, and La Cienega Boulevard, is a 1 percenter's statement of pure power. Deep-pocketed tenants will enjoy such high-life amenities as concierge service, a deluxe fitness center with full spa, on-site valet, a dog-walking service, on-call luxury sedans. And full room service.

"If you want a salad from the Polo Lounge," Caruso told the *L.A. Times* last year, "we'll bring you a salad from the Polo Lounge. People want to be pampered."

Caruso is eager to pack a whole bunch of affluent folks who can afford high monthly prices into one, super-sized mega-project no matter what the consequences may be for surrounding neighborhoods and already-jammed streets.

But Caruso needs the L.A. Planning Department and city politicians to sign off on a zone and “height district” change. Those are supposed to be rare — but the City Council approves dozens, sometimes in a single week. He also needs the City Council to green-light a General Plan “amendment” to change the land use allowed from “*Neighborhood* Office Commercial” to “*Regional Center* Commercial.”

333 La Cienega is not zoned for any of this for a reason: There’s no infrastructure to prop it up, and no way for the crowded community to absorb it. It’s nowhere near the subway. But they’re calling it a boon for people who want to use transit.

Once that land is magically turned by the City Council into a “Regional Center Commercial,” almost anything can be justified upon it. Caruso doesn’t even have to build. He can flip the land, and walk away with tens of millions of dollars.

That’s why we need the Neighborhood Integrity Initiative heading for the March 2017 ballot. 12-1

Think about it. Rick Caruso makes what for him is a truly modest investment: $418,000 in contributions and lobbying fees since 2000. And if the City Council says “yes” to The Flying Cruise Ship, Caruso gets a return he’d be damn lucky to pull off on Wall Street.

---------- Forwarded message ----------
From: **Russell, Michael** <MRussell@cantor.com>
Date: Tue, Jun 14, 2016 at 12:04 PM
Subject: 333 S. La Cienega Boulevard (Caruso Project)
To: "alejandro.huerta@lacity.org" <alejandro.huerta@lacity.org>, "paul.koretz@lacity.org" <paul.koretz@lacity.org>, "david.ryu@lacity.org" <david.ryu@lacity.org>

To City of Los Angeles,

I'm a proud fourth-generation resident of the City of Los Angeles. I grew up in Hancock Park and currently live in Los Feliz with my wife and two children. Unfortunately, I have seen LA fail to keep pace with our need for new housing and smart urban planning compared to so many other cities. Our home is close to the Target on Western that has sat half-finished for two years because of small number of people who hate progress. It's a disgrace. That why I wanted to weigh in on Rick Caruso's project at 333 S. La Cienega.

I work in Century City and drive through this neighborhood every weekday. The intersections around the old Loehmann's are ugly, traffic jammed, and unsafe for pedestrians. Such a nice area deserves better. After learning about the Caruso project at the old Loehmann's department store, I understand that it would include new crosswalks and street light signalization that would be a major improvement for everyone. The building, itself, including the green space, fountain, street trees, and grocery store is also a much better use of the site and represents where we should be headed as a city. 13-1

If the pedestrian and traffic improvements are kept as requirements for approval, I strongly support this project and urge your approval.

Thank you,

Michael Russell

1957 Myra Avenue

Los Angeles, CA 90027

---------- Forwarded message ----------
From: **Ben S. Cohen** <benscohen@yahoo.com>
Date: Wed, Jun 15, 2016 at 4:16 PM
Subject: Re: 321 San Vicente
To: Alejandro Huerta <alejandro.huerta@lacity.org>

Dear Alejandro ,
Thank you for your quick replay ,
I don't object the project , however since my unit is facing directly the new proposed project there are few issues going from a 4 stories to 20 Stories. That are the negative affects for my unit : 14-1

Shadowing affect and loss of sunlight.
looking at a block of building - loosing half of my current views.
Noise from proposed Supermarket trucks early morning . 14-2

If there is someone from the developer company that can contact me to explain, it will be good .

Thank you& Regards ,

Ben S. Cohen
702-683-1415.

On Jun 13, 2016, at 3:22 PM, Alejandro Huerta <alejandro.huerta@lacity.org> wrote:

> Dear Mr. Cohen:
>
> The project is going through the environmental review process right now. A description of the proposed project and the detailed environmental analyses are found in the the Initial Study and the Draft Environmental Impact Report. The hyperlinks are included. These documents can answer any questions you might have about the project. After you read the documents, feel free to email me any comments you may have regarding the project. The comments will become part of the record for this case and you will be notified of any future meetings or hearings if you indicate an address to which you want those notices sent.
>
> You have until July 5th to email me your comments. This date is the end of the comment period for the Draft Environmental Impact Report. After that there will be hearings for the project where members of the public can give their comments.
>
> Sincerely,
> ALEJANDRO A. HUERTA
> **Los Angeles City Planning**
> Environmental Analysis
> Major Projects
>
> On Mon, Jun 13, 2016 at 1:28 PM, Ben S. Cohen <benscohen@yahoo.com> wrote:
> Dear Alejandro ,
> I got your info as the contact person to talk to in regards to the new proposed building across from my condo(unit #1105) .
> I have some questions and concerns in regards to the project and I wanted to know whom do I talk to .
>
> Best ,
>
> Ben S. Cohen
> 702-683-1415.

Sincerely,
ALEJANDRO A. HUERTA
Los Angeles City Planning
Environmental Analysis
Major Projects

On Mon, Jun 13, 2016 at 1:28 PM, Ben S. Cohen <benscohen@yahoo.com> wrote:
Dear Alejandro ,
I got your info as the contact person to talk to in regards to the new proposed building across from my condo(unit #1105) .
I have some questions and concerns in regards to the project and I wanted to know whom do I talk to .

Best ,

Ben S. Cohen
702-683-1415.

From: Yhudit Bernstein <mbbm88@gmail.com>
Date: Thu, Jun 16, 2016 at 4:45 PM
Subject: Planned residential and commercial development for 333 La Cienega Blvd
To: Alejandro.Huerta@lacity.org

6-15-2016
To: Alejandro Huerta, Planning Department.

Ref: Planned residential and commercial development for 333 La Cienega Blvd
My Name is Yhudit Bernstein and have resided at 321 S. San Vicente apt# 1103 for the past 21 years. My apartment unit is located on top floor of the East side of my building, directly across the planned development which is scheduled to begin shortly. It has come to my attention that the developer is requesting a change in zoning which will permit him to build a massive 20 story development in a previously 4 story permitted zone.
Due to the zoning change requested, I have serious concerns listed below.
Quality of life and property value concerns: 15-1

NOISE, POLLUTION, TRAFFIC:
In addition to undergoing extreme disruption of life quality during construction which could last Years. The new massive development is seeking to create a restaurant and retail complex which will permanently add extreme commercial, residential, and retail traffic and pollution that will undoubtedly make our lives unbearable. 15-2 The planned development will replace our views and quiet with commercial docking and loading zones and retail trash dump areas. 15-3

SHADOWING EFFECT:
I purchased my apartment due to the spectacular views, abundant sunshine, fresh air, and privacy. I strongly believe that the zoning change will negate every single reason I initially purchase the unit for. The 20 story development will undoubtedly block any direct sun light due to the massive development shadowing my unit. I also currently enjoy an abundance of fresh air and breeze which will no longer exist due to the air flow disruption. 15-4

PRIVACY:
Due to the height of the new building and units towering overhead, we will no longer have any privacy as many new tenants of the development will be able to directly look into my unit. This 20 story development will in one swoop deny me all of the benefits that I currently enjoy residing in my unit. 15-5

PROPERTY VALUE:
Due to the zoning change I believe that the value of my unit will be seriously impacted. It is clear that many of the advantages my unit currently enjoys will disappear.
This unit is my life's savings and essential for my retirement and I do not believe that elderly such as myself should carry the financial burden as others may benefit.
I truly believe that you have my best interests at heart and my concerns will be properly addressed. Please do not approve the zone changing. 15-6

Thank You Yhudit Bernstein
Unit #1103 Email:mbbm88@gmail.com Tel:310-704 7477

---------- Forwarded message ----------
From: **Mary Bonafede** <maryabonafede@yahoo.com>
Date: Sat, Jun 18, 2016 at 2:37 PM
Subject: Caruso Building Project - 333 S. La Cienega Boulevard, Los Angeles, CA 90048
To: "alejandro.huerta@lacity.org" <alejandro.huerta@lacity.org>

Dear Mr. Huerta,

I am a resident of the Westbury Terrace condominiums at 321 S. San Vicente Blvd., LA, CA 90048. I've lived in the Beverly Grove area for the past twenty years but decided to finally purchase a home about 4 years ago. I looked diligently for over a year to find my home and was thrilled to find my unit (#505) because of the expansive view seen when you first walk in the door as well as the abundant natural light.

I was sick to my stomach when I learned of the impending Caruso project at 333 S. La Cienega Blvd; directly across the street from my unit. Not only will my unit lose the view I paid top dollar to have but my room will have diminished daylight as a result. I recently had my home appraised when refinancing and the appraiser clearly stated that the view does factor into the overall appraisal in terms of the quality of the home. 16-1

Aside from the loss of home value, My unit is east facing and we already have a lot of traffic noise from San Vicente Boulevard. The idea of jackhammers, crew members yelling to each other, street closure to accommodate trucks and the dust and grime that will permeate into my home is a lot to tolerate when there is absolutely no value to me. The apartments being built will not provide high range real estate comps for my home when I choose to sell it. 16-2

Though Caruso states the building will be up in 20 months, which is a very long time to live in those conditions when you're in your own home, it is most likely that we will have to tolerate the mess for more than 2 years. The effect on my view and sunlight is permanent. 16-3

When I purchased my home, there was a low-rise retail store across the street. Now, with a 20 story building, restaurant, grocery store across the way, the traffic and the exhaust and noise that comes with it. 16-4

I know Caruso owns the property and since Loehmann's close, they need a new tenant. I would hope they could find another retailer to move into the existing space or at the most, demo and rebuild something much much smaller in scope that can continue to be a lucrative source of revenue for Caruso. 16-5

I hope you take my concerns seriously as I have been very distressed about this situation. I hope to live in my home for a long time and enjoy what I purchased with mindful content.

Your consideration and assistance will be greatly appreciated.

Best Regards,

Mary Bonafede (#505)

Comment Letter 17

---------- Forwarded message ----------
From: **Dick Reichelderfer** <dickfrn@att.net>
Date: Sun, Jun 19, 2016 at 3:02 PM
Subject: Fw: 333 La Cienega
To: "paul.koretz@lacity.org" <paul.koretz@lacity.org>, "alejandro.huerta@lacity.org" <alejandro.huerta@lacity.org>

Subject: 333 La Cienega

Gentlemen;
I am writing you to share my concerns regarding the proposed development at 333 S. La Cienega blvd.

First and most important is the traffic. We have an existing traffic problem in the area today. From my unit in the Westbury Terrace condos', I have a view of the intersection of 3rd St. and La Cienega Blvd and many times I can see the northbound traffic on La Cienega partially or completely blocking the westbound traffic on 3rd st. when 3rd st has a green light. When this happens, the pedestrians trying to cross La Cienega have to dodge between vehicles to get to the other side. I have also seen ambulances heading west on 3rd occasionally have difficulty at

17-1

To compound this existing problem, the Beverly Center Mall is undergoing a huge expansion which will presumably bring a substantial amount of additional traffic to the intersection.

On top of this, the Caruso Affiliated project wants to add 145 residential units with I guess, at least 250 or more vehicles, a supermarket and a restaurant. I am told that their E. I. R. says that with a few minor mitigation efforts, there will be no significant impact on traffic. I am no expert in these matters, but I t cannot see how this could be. If minor mitigation efforts were so effective, why hasn't the City used them to alleviate the existing problem???????

17-2

17-3

My unit is directly across the street from the proposed project. Later this year, I will turn 80 and my wife will be 70. Both of us are retired and really not looking forward to the noise and dust which would be created by the development. As to being relocated, I really don't like the idea of trading a 1250 sq. ft. condo for a 300 sq. ft. hotel room and I'm not even sure if the Caruso people have taken that off the table in their negotiations.

17-4

Yours truly,

Dick Reichelderfer

Comment Letter 18

Jaber Original Holdings

848 N. La Cienega Blvd, Suite 207 Los Angeles, CA 90069
Tel: (310) 657-0700 Fax: (310) 360-9311

June 21, 2016

Alejandro A Huerta
Major Projects & Environmental Analysis
Department of City Planning
City Hall, City of Los Angeles
200 North Spring Street, Room 750
Los Angeles, CA 90012
Email: alejandro.huerta@lacity.org
Paul.Koretz@lacity.org
Shawn.bayliss@lacity.org

Re: Case# ENV-2015 897 EIR
Support 333 La Cienega Blvd, Los Angeles, CA 90048

Gentlemen,

We are the owners of parcel 4334-009-158, consisting of 3 lots (301 S. La Cienega Blvd), located immediately abutting along the northerly property line of the proposed project at 333 S. La Cienega Blvd, Los Angeles California 90048. Additionally our family owns an additional 6 lots along North La Cienega Blvd, demonstrating our commitment to La Cienega Blvd., and the local community.

We have reviewed the proposed project of applicant CRM Properties. We are in support of the project. We feel the proposed project by Caruso, clearly demonstrates a design that reflects the needs of Los Angeles to grow in the right way; meaning one which provides the much needed housing, and promotes the walk-ability of the area while providing quality retail along public transit routes. 18-1

We encourage the City to work with the developer in making the crosswalks safer at La Cienega & 3rd Street, San Vicente and Burton Way. We are confident that Caruso's 333 La Cienega project will enhance the area greatly. Mr. Caruso and Caruso Affiliated projects have always proven to provide high quality projects that benefit the community at large; and are projects that the City of Los Angeles, and local communities can be proud of.

We feel that 333 La Cienega is a good project. Caruso Affiliated and Mr. Caruso have always been good neighbors, and we appreciate their community outreach in working with neighbors and businesses over the years. The city needs more quality projects such as this.

Very truly yours,

David B Tohl
Jaber Original Holdings, LLC
848 N La Cienega Blvd., Suite 207
Los Angeles, CA 90069

---------- Forwarded message ----------
From: **Janet Wei** <janet.wei@gmail.com>
Date: Wed, Jun 22, 2016 at 6:30 PM
Subject: Concerns regarding 333 La Cienega/Caruso Project
To: alejandro.huerta@lacity.org

Dear Mr. Huerta,

I am deeply concerned regarding a proposal from Rick Caruso to build a 20 story building on 333 La Cienega, which is across the street from my home. I live in 321 S San Vicente Blvd and my unit is on the 10th floor facing the prior Loehmann's building. I currently have a view of downtown Los Angeles and plenty of sunlight.

The construction would:

1) eliminate my view. My unobstructed view of downtown was a significant reason why I purchased my unit. Currently the Beverly Center blocks my view to the North, so if the Caruso building blocks my view to the east, then I have no view at all. 19-1

2) severely decrease my sun exposure into my unit, as described in #1. 19-1

3) eliminate my privacy due to the new apartments facing my window 19-1

4) increase dust in this area, which would aggravate my allergies, breathing and vision 19-2

--Mr Caruso has offered free hotel stays for the residents in my building for the entire duration of the construction, but this is no guarantee 19-2

5) cause significant noise, which would disturb my sleep. I work late hours and rely on catching up on my sleep on the weekends. 19-3

6) decrease the value of my condo due to the loss of view and privacy 19-4

7) increase traffic and competition for street parking, which is already an existing challenge. The traffic may even worsen with the Beverly Center expansion. 19-5

8) increase power utility in this region, which may increase the likelihood of power outages (our building just had one a few days ago). 19-6

I would greatly appreciate you and the LA department of city planning to consider these concerns when you review Mr. Caruso's proposal. 19-7

Thank you for your time and for serving our city.

Sincerely,
Janet Wei

---------- Forwarded message ----------
From: **Eva Hernandez** <magalyhrd@hotmail.com>
Date: Fri, Jun 24, 2016 at 9:32 AM
Subject: Concerns about Caruso Project
To: "alejandro.huerta@lacity.org" <alejandro.huerta@lacity.org>

Eva Hernandez

321 S San Vicente Blvd apt 406

Los Angeles, CA 90048

June 24, 2016

Los Angeles Department of City Planning

Alejandro Huerta

Dear Mr. Huerta,

I am writing to express my concern on the Caruso Project on 333 La Cienega Blvd, LA 90048. The fact that this project is planned just across my building and that it is estimated 20 -24 months of construction, possess a problem for my family. My oldest son is Asthmatic and the fact of all the dust and construction debris will clearly affect his health and we don't want to spend time on ER anymore. 20-1

Another issue that is worth talking about is the zoning change from 4 story to 20 story building. This will affect the scenery in the neighborhood due to the fact that it will be the only tall building inviting many tenants to live on it. This issue will not only bring more pollution to our zone but also it will increase traffic making it almost impossible to live in. As of today, the traffic in peak hours around La Cienega and San Vicente Blvd is terrible and this building will just add more to it. 20-2 20-3

There are many elder people and children living in my building. Therefore, if the city grants permission to build the 333 La Cienega building and adds restaurant s on the ground floor, the alcohol sale should be restricted after certain hours to protect our safety and the level of noise. 20-4

In addition, the Beverly Center is been expanded and remodeled. This issue by itself will significantly increase traffic, congestion, parking issues. If the Caruso project is added it will be just an extreme chaos. Therefore, I petition that this project be placed on hold until the Berverly Center expansion is finished and we can really analyze the traffic and congestion issues. 20-5

Of all the issues discussed above, the one that really concerns me is my son's health. I don't want him to suffer the consequences on the dirt, debris that a construction of this magnitude will provoke. 20-6

Sincerely,

Eva Hernandez

---------- Forwarded message ----------
From: **Chopra, Sameer** <Sameer.Chopra@med.usc.edu>
Date: Sun, Jun 26, 2016 at 7:23 PM
Subject: Concern: Project 333 La Cienega Boulevard
To: "alejandro.huerta@lacity.org" <alejandro.huerta@lacity.org>, "rkbhatia@midcitywest.org" <rkbhatia@midcitywest.org>, "cary@carybrazeman.com" <cary@carybrazeman.com>, "ssale@midcitywest.org" <ssale@midcitywest.org>
Cc: Yhudit Bernstein <mbbm88@gmail.com>

Dear Alejandro and associates,

I am emailing to express my strong concerns for the current Caruso Affiliated project changing zoning from a 4 story to 20 story unit. As a physician, one of the main alarming concerns I have first and foremost is the potential heavy traffic and congestion that changing from four stories to 20 stories will cause. As a resident of the neighborhood, I am constantly reminded about the proximity of my residence to Cedars Sinai Medical Center. Cedars Sinai is a Level I trauma center, and every day, multiple EMS units are transporting very sick, unhealthy, and more than likely, dying patients where precious minutes can change outcomes. By changes to the project, a significant amount of traffic will be added to the area. There already is a significant amount of traffic caused by the Beverly Center shopping center, and adding a 145 unit less than 1000 yards away from the hospital will put patients' lives at stake due to the significant amount of traffic and congestion this planned project would cause. Before motion of this zoning change is decided, I would stress to the committee and whomever is involved in this decision that a thorough investigation be done to determine the effect such buildings have on the impact of hospitals, health care provided, and delays that EMS units encounter due to such projects. I have seen repeatedly the difficulties already EMS units have with the current traffic as they attempt to navigate between the traffic jams to get unhealthy patients to the trauma center. 21-1

I would like to reiterate that this zoning decision is life altering, and could even theoretically cause people to die. Please do not take this decision lightly; patients' lives are at stake.

In addition, there are other concerns this projected building can have. However, I do not want to dilute my main concern about how patients' lives will be at stake and/or compromised if this project is allowed to come to completion. Once again, before any decision is made, please do the due diligence in determining first and foremost, the impact this unit has on the medical center.

Thank you.

Sameer Chopra

Sameer.Chopra@med.usc.edu

321 S. San Vicente Blvd.

Unit 803

Los Angeles, CA 90048

---------- Forwarded message ----------
From: **MASSOUD ESHMOILI** <meshmoili@gmail.com>
Date: Tue, Jun 28, 2016 at 11:12 PM
Subject: 333 La Cienega project EIR extension
To: alejandro.huerta@lacity.org
Cc: Yhudit Bernstein <mbbm88@gmail.com>, Alex Foxman <alexfoxman@bhinstitute.com>, Susan Hanasab <christmasgiftscom@gmail.com>

Hi Alejandro,

I am writing this email on behalf of our growing group of over 50 residents and concern community of 321 S. San Vicente Blvd to request from you an extension of deadline of July 5th to August 5th for the Mid City West Neighborhood Council to have time to review and examine the Environmental impact report since Scott
Sale was just appointed to this new position for 333 La Cienega project.
Here is his email address.
Ssale@midcitywest.org
Your help is greatly appreciated since this project will effect many lives and Mid City West Council will have an important decision to make by having time to review and examine the EIR and hear the concerned community voice.

22-1

Thank you,

Michael Eshmoili

Your confirmation by replying is appreciated

Comment Letter 23

Alejandro Huerta
Environmental Analysis Section
Department of City Planning
200 N. Spring Street, Room 750,
Los Angeles, CA 90012

Subject Line: 333 S. La Cienega – Please Approve

To the City of Los Angeles

I am a resident of 8500 Burton Way. Our building is directly across San Vicente Boulevard from the 333 South La Cienega project.

Last year, we heard about Rick Caruso's plans for a sister building to ours where the Loehmann's department store is currently located. My neighbors and I are very supportive of this major improvement to the neighborhood. I am particularly supportive of the new green space that will be part of the project and making major safety improvements to the crosswalks around the site. This is a much about improving traffic and pedestrian safety as it is about constructing a magnificent new building.

I understand that some people may oppose the project because they don't want any construction noise or trucks on the site. Living across the street, I have the same concerns. However, I know that the Caruso team will live up to their pledge that they will make every effort to minimize the hassle to neighbors, like me. I also believe that we will all be grateful for this new building and the street improvements once it's completed. So let's get started. Please approve this project.

23-1

Thank you,

Stacy King
8500 Burton Way, # 707
Los Angeles, CA
90048

Comment Letter 24

Alejandro Huerta
Environmental Analysis Section
Department of City Planning
200 N. Spring Street, Room 750,
Los Angeles, CA 90012

Re: Approve 333 S. La Cienega/Caruso Project

Dear Mr. Huerta,

I live in an apartment at 8500 Burton Way across the street from 333 S. La Cienega – the location of the new Caruso project. As an immediate neighbor, I hope the city will approve the project and make it happen as soon as possible.

The 333 project is an opportunity to replace an ugly, brown concrete block with a beautiful, modern apartment building. Caruso has also stated that they will pay safer crosswalks, landscape the barren street medians, and make La Cienega a much more pleasant street to walk along. I look forward to shopping at the new grocery store and dining outside at the new restaurant. This is such an important opportunity to improve scenery and safety of the neighborhood.

I am fortunate to have visited many great cities around the world. What they all have in common is a commitment to building the right things in the right locations so as to create a "joie de vivre." I believe that this is just such a project that will create more of that feeling here in our neighborhood.

24-1

Thank you,

Mark Leventen
8500 Burton Way #617
Los Angeles, CA
90048

Comment Letter 25

Alejandro Huerta
Environmental Analysis Section
Department of City Planning
200 N. Spring Street, Room 750,
Los Angeles, CA 90012

Subject Line: Please approve 333 S. La Cienega project

Dear Mr. Huerta,

I am a resident at 8500 Burton Way which is located right across the street from 333 S. La Cienega. I support the new project and hope you will approve it quickly. The project is a major improvement over Loehmann's and will be a benefit to the entire neighborhood.

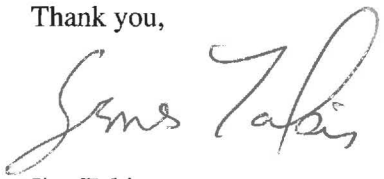
In my time living at 8500, I have been so impressed with Caruso Affiliated's service and care for our building and the property as a whole. We are an island of fresh flowers, clean sidewalks, and great architecture. Whether it's dining outside at The Larder café or popping into Trader Joes, there is a first-class experience all around. That's why I know that Caruso will do an amazing job with this new project.

The plans for 333 S. La Cienega are a vast improvement over what exists today at the Loehmann's building. The renderings show a beautifully designed building that will complement 8500 Burton Way. The concrete corner will be replaced by a fountain and green park-like area. The plans for a fresh food market and restaurant will create a more lively street experience that connects to the shops and restaurants at the Beverly Center and along 3rd Street. I am also pleased that Caruso will be paying for new crosswalks and lighting to make it safer to walk around the neighborhood.

I know that the construction of the new building will create noise and be an inconvenience to everyone. However, it is a small and temporary price to pay. Please add my name to this list of supporters for this great project

25-1

Thank you,



Jim Takis

8500 Burton Way Apartment 718

Los Angeles, CA

90048

Comment Letter 26

Alejandro Huerta
Environmental Analysis Section
Department of City Planning
200 N. Spring Street, Room 750,
Los Angeles, CA 90012

Re: 8500 Burton Way Resident – Support 333 S. La Cienega

Dear Mr. Huerta,

We are residents at 8500 Burton Way and received the notice to comment on the project located at 333 South La Cienega, located across the street from my apartment. We wanted to write to offer our complete support the new project.

Caruso Affiliated, the owner of our building, shared the plans for the new project with us and answered a number of questions about how it will impact and benefit us. It's evident that the new building with its apartments, grocery store, restaurant, and a small park is a great improvement. Their commitment to new sidewalks, crosswalks, and other street improvements will make the neighborhood safer for cars and pedestrians.

As 8500 residents, we believe that Rick Caruso and Caruso Affiliated have the integrity and track record to make the new project a success. Their team has made commitments to ensure that they will maintain respectful construction hours, make sure that construction workers will not park on surrounding streets and keep us and our neighbors updated regularly until completion.

26-1

This is a great neighborhood that is only getting better from Beverly Center upgrades to new restaurants and shops on 3rd Street. The new Caruso project will be a welcomed addition.

Sincerely,

Philip & Diana Gatt

8500 Burton Way, #601

Los Angeles, CA 90048

Comment Letter 27

Alejandro Huerta
Environmental Analysis Section
Department of City Planning
200 N. Spring Street, Room 750,
Los Angeles, CA 90012

RE: 333 La Cienega - Case #: ENV-2015-897 EIR

To the City of Los Angeles

My name is Fadi Zaya and live at 8500 Burton Way (the Caruso building) located across the street from the project proposed at the old Loehmann's. I support the new project and hope you will approve it quickly.

In just the past few years, I've watched this neighborhood transform into an even more vibrant place to live. As a Caruso resident, I know firsthand the quality and care that goes into maintaining both our building and the surrounding property. The sidewalks are power washed frequently. There is beautiful landscaping that is always kept fresh. Litter never accumulates. The Trader Joe's is a convenient and enjoyed by all. It's a pleasure to live here.

However, I also look outside my window and see bad traffic, dirt filled street medians and dangerous crosswalks. The 333 project is an opportunity to extend the experience that we and our neighbors enjoy to the other side of San Vicente Blvd. I understand that Caruso has offered to pay for traffic improvements and safer crosswalks. He has also offered to landscape and maintain the street medians. These are major investments that I don't see happening without the 333 project. Plus, the new building design looks great.

This is good for our neighborhood and good for the city. I implore you to approve the project.

27-1

Sincerely,

Fadi Zaya
8500 Burton Way Apt #517
Los Angeles, CA
90048

Comment Letter 28

Alejandro Huerta
Environmental Analysis Section
Department of City Planning
200 N. Spring Street, Room 750,
Los Angeles, CA 90012

Subject Line: As a neighbor, I support the 333 La Cienega project

Mr. Huerta:

I live at 8500 Burton Way, located across the street from the 333 S. La Cienega project. I want to communicate my support for this project.

This neighborhood is one of LA's best. I chose to live here because of the central location and the proximity to the great stores, restaurants, and cafes along 3rd Street and Beverly. I also believe that my building has been an important improvement especially seeing how what used to be a parking lot is now a destination for the many people from throughout the neighborhood that walk to the Trader Joe's and dine outside at the Larder.

28-1

While I know the construction of an entirely new building will be temporarily disruptive to me and will take some time, I also know that the final product will make this neighborhood even better. This is what needs to happen to make sure that our neighborhood continuously improves in order to serve the needs of the people that live and work here. Please count on my support and I urge your approval.

Sincerely,

Pras Michel

8500 Burton Way, #401
Los Angeles, CA 90048

June 30, 2016

To Whom It May Concern:

We are a growing group of over 50 owners/residents at 321 South San Vicente Blvd (Westbury Terrace) who are greatly concerned and angered regarding the proposed Caruso Affiliated, 333 La Cienega Blvd (Caruso Project), twenty (20) story apartment complex.

Please note and consider this request 29-1

A. Due to the very recent appointee of Mr. Scott Sale at Mid City West neighborhood council for the 333 La Cienega Blvd project, we would like to request the deadline of July5th for environmental report to be extended to August 5th so they would have time to study the environmental report fully before any decisions made.

Our concerns are vast are shared by other community groups and include:

1. Size and Scope of the proposed project

The Caruso Project is currently zoned (C2-1VL-O) for a maximum four (4) story structure with a Neighborhood Office Commercial designation. Caruso Affiliated, LLC is proposing to drastically change the Zoning and Designation to construct a twenty (20) story apartment structure with 145 residential units and include 31,055 sq/ft of commercial shops, restaurants with full liquor licenses. 29-2

Caruso Affiliated has utilized its' own, self funded and self prepared Environmental Impact Report (EIR) to erroneously conclude that the only substantial impact to the community shall be from "Ambient Construction Noise". The EIR fails to analyze or discuss: 29-3

a. The impact of the $500 million Beverly Center renovation and expansion (tremendous expansion of ground floor street facing commercial space) that will very likely negatively impact local vehicle traffic, congestion, parking, noise and pollution.

b. Recent expansion of Cedars Sinai Medical Center including the Advanced Sciences Pavilion and how the plan for Cedars Sinai to begin moving to a much greater amount of outpatient services will impact the current local area. This will very likely negatively impact local vehicle traffic, congestion, parking, noise and pollution. 29-4

c. 8436 West 3rd Street (Youngerman Building) building re-development as a completely outpatient medical building. This will very likely negatively impact local vehicle traffic, congestion, parking, noise and pollution. 29-5

d. Continued development and increase occupancy of the Beverly Connection property that will very likely negatively impact local vehicle traffic, congestion, parking, noise and pollution. 29-6

e. Ambulance and Emergency services access and traffic flow at Cedars Sinai Medical Center. 29-7

2. Loss of Westbury Terrace, privacy and noise issues

a. Westbury Terrace was constructed in 1976. The windows allow most street ambient noise to enter the units. The East /South facing owner/residents would face hardships during and post construction. This includes terrible ambient construction noise and post construction increased traffic noise and commercial noise. 29-8

b. Most Westbury Terrace East and South facing units would lose their unit views. The views are what most owners/residents purchased the units for. They will ultimately face a decrease in unit value and a decrease in their ability to enjoy their units. 29-9

c. Most Westbury Terrace East and South facing units would lose their privacy from the Caruso Project West facing apartment units. 29-10

d. Unit owners who have purchased units at Westbury Terrace would most certainly face a loss of revenue from the decreased ability to lease/rent their units during and post construction due to the negative impact on the unit views, privacy, noise and traffic. 29-11

3. Health concerns for residents of Westbury Terrace

a. A growing group of long term Westbury Terrace residents are frail, elderly and/or disabled. Some have cardiovascular and pulmonary issues that will be negatively impacted during and after construction. They have in the past and likely in the future require regular medical care on a routine and urgent/emergent basis. The Caruso Project shall cause this population to further avoidable medical complications and may severely limit access to medical care due to traffic and congestion during and post construction. 29-12

Though we had several meetings with Caruso Affiliated regarding our concerns and potential solutions, we have yet to hear any reasonable remedy from Caruso Affiliated, LLC.

It is our demand that the Caruso Project be placed on hold for no less than thirty six (36) months to thoroughly observe, analyze and understand how the other local projects already in progress and the growing list of stated concerns shall impact the local community and the individuals in direct proximity. 29-13

Our group shall directly hold the City Planning, Council-Members and any other involved City departments and/or City Officials directly accountable for any actions that may be deemed as "rubber stamping" and/or not representing the interests of the community at large, regarding the Caruso Project. We plan to invite, if necessary, local, state and national anti-development coalitions and utilize our media sources to further bring light to the negative impact of the Caruso Project.

Respectfully Submitted,

Concerned Residents of Westbury Terrace

---------- Forwarded message ----------
From: **MASSOUD ESHMOILI** <meshmoili@gmail.com>
Date: Mon, Jul 4, 2016 at 1:29 PM
Subject: 333 La Cienega Blvd Caruso project
To: alejandro.huerta@lacity.org

To Whom it may concern:

I am emailing my personal concerns about the 333 La Cienega Blvd project.

I strongly object and challenge the EIR report for the following reasons.

1. $500 million dollar Beverly Center Mall renovation has not been factored into this EIR report, this renovation will definitely bring more traffic congestion, noise and pollution to already congested traffic we already have. 30-1

2. Cedar Sinai Medical Center is Level 1 trauma center, with all the uncertainty in the world, we should seriously consider to keep the traffic light for the sake of saving lives incase of an emergecy to let the ambulances and fire trucks to go through, this change of zoning from 4 story to 20 is going to stop or delay the life saving ambulances to go through trafic on time, therefore will cause many lives to be lost. 30-2

3. When I purchased my Condo, I was told the zoning for 333 La Cienega is no more than 4 story , changing the zoning will cause many negative impact on my personal life such as loss of view, more traffic congestion, pollution, loss of privacy and traffic noise as well as due to sale of alcohol having drunk people around in late hours (there is a bar called 3rd stop on 3rd street open till 2 am which causes drunks to yell and scream at 1 or 2 in the morning disturbing peace). 30-3

I must add, somethings are reversable in life, changing the zoning on this property is not once it is approved, I strogly suggest to put this project on hold till we find the impact of Beverly Center Mall Renovation in this community, then a wise decision can be made without regret. 30-4

Thank you so much.

Michael Eshmoili

---------- Forwarded message ----------
From: **Joyce Dillard** <dillardjoyce@yahoo.com>
Date: Tue, Jul 5, 2016 at 3:53 PM
Subject: Comments DCP DEIR 333 La Cienega Boulevard Project due 7.5.2016
To: Alejandro Huerta <alejandro.huerta@lacity.org>

The site address is not made clear. It is 333 South La Cienega Boulevard, not 333 North La Cienega Boulevard. 31-1

Mitigation Measure HAZ-4 mentions the Grading Permit in relationship to a Soil and Groundwater Management Plan. This measure effects the water quality and compliance issues by the City in satisfying the TMDL requirements and the MS4 permit.

LA Regional Water Quality Control Board issued Municipal Separate Storm Sewer Systems Permit ORDER NO. R4-2012-0175 NPDES PERMIT NO. C. It reads as

D. Permit Coverage and Facility Description
The Los Angeles County Flood Control District, the County of Los Angeles, and 84 incorporated cities within the Los Angeles County Flood Control District with the exception of the City of Long Beach (see Table 5, List of Permittees), hereinafter ***referred to separately as Permittees and jointly as the Dischargers****, discharge storm water and non-storm water from municipal separate storm sewer systems (MS4s), also called storm drain systems. For the purposes of this Order, references to the "Discharger" or "Permittee" in applicable federal and state laws, regulations, plans, or policy are held to be equivalent to references to the Discharger, or Permittees herein depicting the major drainage infrastructure within the area covered under this Order are included in Attachment C of this Order.* 31-2

Ballona Creek Watershed Group is in the Santa Monica Bay Watershed Management Area with the City of Los Angeles as the Lead Agency in the preparation of the EWMP Enhanced Watershed Management Plans and the CIMP Coordinated Integrated Monitoring Program. There exists responsibility for the Receiving Water compliance issues with timelines of

Ballona Creek Trash TMDL September 30, 2015

Ballona Creek Estuary Toxic Pollutants TMDL January 11, 2021

Ballona Creek, Ballona Estuary and Sepulveda Channel Bacteria TMDL
Dry Weather April 27, 2013
Wet Weather July 15, 2021

Ballona Creek Metals TMDL
Dry Weather January 11, 2016
Wet Weather January 11, 2021

All NPDES permitting required should be addressed under its current permit(s). 31-2

We question the omission of a Methane Prevention Detection and Monitoring Program (Mitigation Plan). We cannot locate the DOGGR Division of Oil, Gas and Geothermal Resources and Fire Department clearances. 31-3

We also question the City staffing capabilities to monitor the Mitigation Plan. 31-4

CIRCULATION ELEMENT

There is no adopted Circulation Element which is a comprehensive infrastructure plan addressing the circulation of people, goods, energy, water, sewage, storm drainage, and communications. The Circulation Element is required by the State of California. 31-5

Alternatives offered do not disclose the information necessary for infrastructure needs. 31-6

Joyce Dillard
P.O. Box 31377
Los Angeles, CA 90031

Attachment:
Order R4-2012-0175-Final Attachment M

ATTACHMENT M. TMDLs IN THE SANTA MONICA BAY WATERSHED MANAGEMENT AREA

A. Santa Monica Bay Beaches Bacteria TMDL

1. Permittees subject to the provisions below are identified in Attachment K, Table K-2.

2. Permittees shall comply with the following final water quality-based effluent limitations for discharges to Santa Monica Bay during dry weather as of the effective date of this Order and during wet weather no later than July 15, 2021:

Constituent	Effluent Limitations (MPN or cfu)	
	Daily Maximum	Geometric Mean
Total coliform*	10,000/100 mL	1,000/100 mL
Fecal coliform	400/100 mL	200/100 mL
Enterococcus	104/100 mL	35/100 mL

* Total coliform density shall not exceed a daily maximum of 1,000/100 mL, if the ratio of fecal-to-total coliform exceeds 0.1.

3. Section A.2 above shall not be applicable upon the effective date of the revised Santa Monica Bay Beaches Bacteria TMDL (Attachment A of Resolution No. R12-007). Upon the effective date of the revised Santa Monica Bay Beaches Bacteria TMDL, Permittees shall comply with the following daily maximum final water quality-based effluent limitations for discharges to Santa Monica Bay during dry weather as of the effective date of the revised Santa Monica Bay Beaches Bacteria TMDL and during wet weather no later than July 15, 2021. Permittees shall comply with the following geometric mean final water quality-based effluent limitations for each individual monitoring location, calculated as defined in the revised Santa Monica Bay Beaches Bacteria TMDL, no later than July 15, 2021.

Constituent	Effluent Limitations (MPN or cfu)	
	Daily Maximum	Geometric Mean
Total coliform*	10,000/100 mL	1,000/100 mL
Fecal coliform	400/100 mL	200/100 mL
Enterococcus	104/100 mL	35/100 mL

* Total coliform density shall not exceed a daily maximum of 1,000/100 mL, if the ratio of fecal-to-total coliform exceeds 0.1.

4. Receiving Water Limitations

a. Permittees in each defined jurisdictional group shall comply with the interim single sample bacteria receiving water limitations for shoreline monitoring stations within their jurisdictional area during wet weather, per the schedule below:

Deadline	**Cumulative percentage reduction from the total exceedance day reductions required for each jurisdictional group as identified in Table M-1**
July 15, 2013	25%
July 15, 2018	50%

b. Section A.4.a above shall not be applicable upon the effective date of the revised Santa Monica Bay Beaches Bacteria TMDL (Attachment A of Resolution No. R12-007). Upon the effective date of the revised Santa Monica Bay Beaches Bacteria TMDL, Permittees in each defined jurisdictional group shall comply with the interim single sample bacteria receiving water limitations for shoreline monitoring stations within their jurisdictional area during wet weather, per the schedule below:

Deadline	**Cumulative percentage reduction from the total wet weather exceedance day reductions required for each jurisdictional group as identified in Table M-2**
July 15, 2013	25%
July 15, 2018	50%

Table M-1: Interim Single Sample Bacteria Receiving Water Limitations by Jurisdictional Group

Jurisdiction Group	Primary Jurisdiction	Additional Responsible Jurisdictions & Agencies	Subwatershed(s)	Monitoring Site(s)	Interim Single Sample Bacteria Receiving Water Limitations as Maximum Allowable Exceedance Days during Wet Weather		
					10% Reduction Milestone	25% Reduction Milestone	50% Reduction Milestone
1	County of Los Angeles	Malibu City of Los Angeles (Topanga only) Calabasas (Topanga only)	Arroyo Sequit	SMB 1-1	221	212	197
			Carbon Canyon	SMB 1-13			
			Corral Canyon	SMB 1-11, SMB 1-12			
			Encinal Canyon	SMB 1-3			
			Escondido Canyon	SMB 1-8			
			Las Flores Canyon	SMB 1-14			
			Latigo Canyon	SMB 1-9			
			Los Alisos Canyon	SMB 1-2			
			Pena Canyon	SMB 1-16			
			Piedra Gorda Canyon	SMB 1-15			
			Ramirez Canyon	SMB 1-6, SMB 1-7			
			Solstice Canyon	SMB 1-10			
			Topanga Canyon	SMB 1-18			
			Trancas Canyon	SMB 1-4			
			Tuna Canyon	SMB 1-17			
			Zuma Canyon	SMB 1-5			

Jurisdiction Group	Primary Jurisdiction	Additional Responsible Jurisdictions & Agencies	Subwatershed(s)	Monitoring Site(s)	Interim Single Sample Bacteria Receiving Water Limitations as Maximum Allowable Exceedance Days during Wet Weather		
					10% Reduction Milestone	25% Reduction Milestone	50% Reduction Milestone
2	City of Los Angeles	County of Los Angeles El Segundo (Dockweiler only) Santa Monica	Castlerock	SMB 2-1	342	324	294
			Dockweiler	SMB 2-10, SMB 2-11, SMB 2-12, SMB 2-13, SMB 2-14, SMB 2-15			
			Venice Beach	SMB 2-8, SMB 2-9			
			Pulga Canyon	SMB 2-4, SMB 2-5			
			Santa Monica Canyon	SMB 2-7			
			Santa Ynez Canyon	SMB 2-2, SMB 2-3, SMB 2-6			
3	Santa Monica	City of Los Angeles County of Los Angeles	Santa Monica	SMB 3-1, SMB 3-2, SMB 3-3, SMB 3-4, SMB 3-5, SMB 3-6 SMB 3-7, SMB 3-8[#] SMB 3-9	257	237	203
4	Malibu	County of Los Angeles	Nicholas Canyon	SMB 4-1[#]	14	14	14
5	Manhattan Beach	El Segundo Hermosa Beach Redondo Beach County of Los Angeles	Hermosa	SMB 5-1[#], SMB 5-2, SMB 5-3[#], SMB 5-4[#], SMB 5-5[#]	29	29	29

Jurisdiction Group	Primary Jurisdiction	Additional Responsible Jurisdictions & Agencies	Subwatershed(s)	Monitoring Site(s)	Interim Single Sample Bacteria Receiving Water Limitations as Maximum Allowable Exceedance Days during Wet Weather		
					10% Reduction Milestone	25% Reduction Milestone	50% Reduction Milestone
6	Redondo Beach	Hermosa Beach Manhattan Beach Torrance County of Los Angeles	Redondo	SMB 6-1, SMB 6-2#, SMB 6-3, SMB 6-4, SMB 6-5#, SMB 6-6#	58	57	56
7	Rancho Palos Verdes	City of Los Angeles Palos Verdes Estates Rolling Hills Rolling Hills Estates County of Los Angeles	Palos Verdes Peninsula	SMB 7-1#, SMB 7-2#, SMB 7-3#, SMB 7-4#, SMB 7-5#, SMB 7-6#, SMB 7-7, SMB 7-8#, SMB 7-9#	36	36	36

For those beach monitoring locations subject to the antidegradation implementation provision in the TMDL, there shall be no increase in exceedance days during the implementation period above that estimated for the beach monitoring location in the critical year as identified in Table M-3.

* The California Department of Transportation (Caltrans) is a responsible agency in each Jurisdiction Group, except for Jurisdiction 7, and is jointly responsible for complying with the allowable number of exceedance days. Caltrans is separately regulated under the Statewide Storm Water Permit for State of California Department of Transportation (NPDES No. CAS000003).

Table M-2: Interim Wet Weather Single Sample Bacteria Receiving Water Limitations by Jurisdictional Group

Jurisdiction Group	Primary Jurisdiction	Additional Responsible Jurisdictions & Agencies	Subwatershed(s)	Monitoring Site(s)	Interim Single Sample Bacteria Receiving Water Limitations as Maximum Exceedance Days Beyond those Allowed during Wet Weather		
					10% Reduction Milestone	25% Reduction Milestone	50% Reduction Milestone
1	County of Los Angeles	Malibu City of Los Angeles (Topanga only) Calabasas (Topanga only)	Arroyo Sequit	SMB 1-1	393	327	218
			Carbon Canyon	SMB 1-13			
			Corral Canyon	SMB 1-11, SMB 1-12, SMB O-2#			
			Encinal Canyon	SMB 1-3#			
			Escondido Canyon	SMB 1-8			
			Las Flores Canyon	SMB 1-14			
			Latigo Canyon	SMB 1-9			
			Los Alisos Canyon	SMB 1-2#			
			Pena Canyon	SMB 1-16#			
			Piedra Gorda Canyon	SMB 1-15			
			Ramirez Canyon	SMB 1-6, SMB 1-7, SMB O-1#			
			Solstice Canyon	SMB 1-10			
			Topanga Canyon	SMB 1-18			
			Trancas Canyon	SMB 1-4			
			Tuna Canyon	SMB 1-17#			
			Zuma Canyon	SMB 1-5			

Jurisdiction Group	Primary Jurisdiction	Additional Responsible Jurisdictions & Agencies	Subwatershed(s)	Monitoring Site(s)	Interim Single Sample Bacteria Receiving Water Limitations as Maximum Exceedance Days Beyond those Allowed during Wet Weather		
					10% Reduction Milestone	25% Reduction Milestone	50% Reduction Milestone
2	City of Los Angeles	County of Los Angeles El Segundo (Dockweiler only) Santa Monica	Castlerock	SMB 2-1	382	318	212
			Dockweiler	SMB 2-10, SMB 2-11, SMB 2-12, SMB 2-13, SMB 2-14, SMB 2-15			
			Venice Beach	SMB 2-8, SMB 2-9			
			Pulga Canyon	SMB 2-4, SMB 2-5			
			Santa Monica Canyon	SMB 2-7			
			Santa Ynez Canyon	SMB 2-2, SMB 2-3, SMB 2-6			
3	Santa Monica	City of Los Angeles County of Los Angeles	Santa Monica	SMB 3-1, SMB 3-2, SMB 3-3, SMB 3-4, SMB 3-5, SMB 3-6, SMB 3-7, SMB 3-8, SMB 3-9	219	183	122
4	Malibu	County of Los Angeles	Nicholas Canyon	SMB 4-1[#]	15	12	8

Jurisdiction Group	Primary Jurisdiction	Additional Responsible Jurisdictions & Agencies	Subwatershed(s)	Monitoring Site(s)	Interim Single Sample Bacteria Receiving Water Limitations as Maximum Exceedance Days Beyond those Allowed during Wet Weather		
					10% Reduction Milestone	25% Reduction Milestone	50% Reduction Milestone
5	Manhattan Beach	El Segundo Hermosa Beach Redondo Beach County of Los Angeles	Hermosa	SMB 5-1#, SMB 5-2, SMB 5-3#, SMB 5-4#, SMB 5-5#	63	52	35
6	Redondo Beach	Hermosa Beach Manhattan Beach Torrance County of Los Angeles	Redondo	SMB 6-1, SMB 6-2#, SMB 6-3, SMB 6-4, SMB 6-5#, SMB 6-6#	62	51	34
7	Rancho Palos Verdes	City of Los Angeles Palos Verdes Estates Rolling Hills Rolling Hills Estates County of Los Angeles	Palos Verdes Peninsula	SMB 7-1#, SMB 7-2#, SMB 7-3#, SMB 7-4#, SMB 7-5#, SMB 7-6#, SMB 7-7, SMB 7-8#, SMB 7-9#	88	73	49

For those beach monitoring locations subject to the antidegradation implementation provision in the TMDL, there shall be no increase in exceedance days during the implementation period above that estimated for the beach monitoring location in the critical year as identified in Table M-4.

* The California Department of Transportation (Caltrans) is a responsible agency in each Jurisdiction Group, except for Jurisdiction 7, and is jointly responsible for complying with the allowable number of exceedance days. Caltrans is separately regulated under the Statewide Storm Water Permit for State of California Department of Transportation (NPDES No. CAS000003).

c. Permittees shall comply with the following grouped[1] final single sample bacteria receiving water limitations for all shoreline monitoring stations along Santa Monica Bay beaches, except for those monitoring stations subject to the antidegradation implementation provision as established in the TMDL and identified in subpart e. below, during dry weather as of the effective date of this Order and during wet weather no later than July 15, 2021:

Time Period	**Annual Allowable Exceedance Days of the Single Sample Objective (days)**	
	Daily Sampling	**Weekly Sampling**
Summer Dry-Weather (April 1 to October 31)	0	0
Winter Dry-Weather (November 1 to March 31)	3	1
Wet Weather[2] (Year-round)	17	3

d. Section A.4.c above shall not be applicable upon the effective date of the revised Santa Monica Bay Beaches Bacteria TMDL (Attachment A of Resolution No. R12-007). Upon the effective date of the revised Santa Monica Bay Beaches Bacteria TMDL, Permittees shall comply with the following grouped[3] final single sample bacteria receiving water limitations for all shoreline monitoring stations along Santa Monica Bay beaches, except for those monitoring stations subject to the antidegradation implementation provision as established in the TMDL and identified in subpart f. below, during dry weather as of the effective date of the revised Santa Monica Bay Beaches Bacteria TMDL and during wet weather no later than July 15, 2021:

Time Period	**Annual Allowable Exceedance Days of the Single Sample Objective (days)**	
	Daily Sampling	**Weekly Sampling**
Summer Dry-Weather (April 1 to October 31)	0	0
Winter Dry-Weather (November 1 to March 31)	9	2
Wet Weather[4] (Year-round)	17	3

[1] The final receiving water limitations are group-based and shared among all MS4 Permittees located within the sub-drainage area to each beach monitoring location.
[2] Wet weather is defined as days with 0.1 inch of rain or greater and the three days following the rain event.
[3] The final receiving water limitations are group-based and shared among all MS4 Permittees located within the sub-drainage area to each beach monitoring location.
[4] Wet weather is defined as days with 0.1 inch of rain or greater and the three days following the rain event.

e. Permittees shall comply with the following grouped5 final single sample bacteria receiving water limitations for shoreline monitoring stations along Santa Monica Bay beaches subject to the antidegradation implementation provision in the TMDL as of the effective date of this Order:

Table M-3: Allowable Number of Days that may Exceed any Single Sample Bacteria Receiving Water Limitations

		Annual Allowable Exceedance Days of the Single Sample Objective (days)					
Station ID	Beach Monitoring Location	Summer Dry Weather (April 1 – October 31)		Winter Dry Weather (November 1 – March 31)		Wet Weather (Year-round)	
		Daily Sampling	Weekly Sampling	Daily Sampling	Weekly Sampling	Daily Sampling	Weekly Sampling
SMB 1-4	Trancas Creek at Broad Beach	0	0	0	0	17	3
SMB 1-5	Zuma Creek at Zuma Beach	0	0	0	0	17	3
SMB 2-13	Imperial Highway storm drain	0	0	2	1	17	3
SMB 3-8	Windward Ave. storm drain at Venice Pavilion	0	0	2	1	13	2
SMB 4-1	San Nicholas Canyon Creek at Nicholas Beach	0	0	0	0	14	2
SMB 5-1	Manhattan Beach at 40th Street	0	0	1	1	4	1
SMB 5-3	Manhattan Beach Pier, southern drain	0	0	1	1	5	1
SMB 5-4	Hermosa City Beach at 26th St.	0	0	3	1	12	2
SMB 5-5	Hermosa Beach Pier	0	0	2	1	8	2
SMB 6-2	Redondo Municipal Pier- 100 yards south	0	0	3	1	14	2
SMB 6-5	Avenue I storm drain at Redondo Beach	0	0	3	1	6	1
SMB 6-6	Malaga Cove, Palos Verdes Estates	0	0	1	1	3	1

[5] The final receiving water limitations are group-based and shared among all MS4 Permittees located within the sub-drainage area to each beach monitoring location.

		Annual Allowable Exceedance Days of the Single Sample Objective (days)					
Station ID	Beach Monitoring Location	Summer Dry Weather (April 1 – October 31)		Winter Dry Weather (November 1 – March 31)		Wet Weather (Year-round)	
		Daily Sampling	Weekly Sampling	Daily Sampling	Weekly Sampling	Daily Sampling	Weekly Sampling
SMB 7-1	Malaga Cove, Palos Verdes Estates	0	0	1	1	14	2
SMB 7-2	Bluff Cove, Palos Verdes Estates	0	0	1	1	0	0
SMB 7-3	Long Point, Rancho Palos Verdes	0	0	1	1	5	1
SMB 7-4	Abalone Cove, Rancho Palos Verdes	0	0	0	0	1	1
SMB 7-5	Portuguese Bend Cove, Rancho Palos Verdes	0	0	1	1	2	1
SMB 7-6	White's Point, Royal Palms County Beach	0	0	1	1	6	1
SMB 7-8	Point Fermin/Wilder Annex, San Pedro	0	0	1	1	2	1
SMB 7-9	Outer Cabrillo Beach	0	0	1	1	3	1

f. Section A.4.e above shall not be applicable upon the effective date of the revised Santa Monica Bay Beaches Bacteria TMDL (Attachment A of Resolution No. R12-007). Upon the effective date of the revised Santa Monica Bay Beaches Bacteria TMDL, Permittees shall comply with the following grouped6 final single sample bacteria receiving water limitations for shoreline monitoring stations along Santa Monica Bay beaches subject to the antidegradation implementation provision in the TMDL as of the effective date of the revised Santa Monica Bay Beaches Bacteria TMDL:

Table M-4: Allowable Number of Days that may Exceed any Single Sample Bacteria Receiving Water Limitations

		Annual Allowable Exceedance Days of the Single Sample Objective (days)					
Station ID	Beach Monitoring Location	Summer Dry Weather (April 1 – October 31)		Winter Dry Weather (November 1 – March 31)		Wet Weather (Year-round)	
		Daily Sampling	Weekly Sampling	Daily Sampling	Weekly Sampling	Daily Sampling	Weekly Sampling
SMB 1-2	El Pescador State Beach	0	0	1	1	5	1
SMB 1-3	El Matador State Beach	0	0	1	1	3	1
SMB O-1	Paradise Cove	0	0	9	2	15	3
SMB 1-10	Solstice Creek	0	0	5	1	17	3
SMB O-2	Puerco Canyon Storm Drain	0	0	0	0	6	1
SMB 1-14	Las Flores Creek	0	0	6	1	17	3
SMB 1-16	Pena Creek	0	0	3	1	14	2
SMB 1-17	Tuna Canyon Creek	0	0	7	1	12	2
SMB 2-11	North Westchester Storm Drain	0	0	0	0	17	3
SMB 2-13	Imperial Highway Storm Drain	0	0	4	1	17	3
SMB 3-6	Rose Avenue Storm Drain at Venice Beach	0	0	6	1	17	3
SMB 4-1	San Nicholas Canyon Creek	0	0	4	1	14	2
SMB 5-1	Manhattan State Beach at 40th Street	0	0	1	1	4	1

[6] The final receiving water limitations are group-based and shared among all MS4 Permittees located within the sub-drainage area to each beach monitoring location.

		Annual Allowable Exceedance Days of the Single Sample Objective (days)					
Station ID	Beach Monitoring Location	Summer Dry Weather (April 1 – October 31)		Winter Dry Weather (November 1 – March 31)		Wet Weather (Year-round)	
		Daily Sampling	Weekly Sampling	Daily Sampling	Weekly Sampling	Daily Sampling	Weekly Sampling
SMB 5-3	Manhattan Beach Pier, southern drain	0	0	3	1	6	1
SMB 5-4	Hermosa Beach at 26th Street	0	0	3	1	12	2
SMB 5-5	Hermosa Beach Pier	0	0	2	1	8	2
SMB 6-2	Redondo Municipal Pier- 100 yards south at Redondo Beach	0	0	3	1	14	2
SMB 6-3	Sapphire Street Storm Drain at Redondo Beach	0	0	5	1	17	3
SMB 6-5	Avenue I Storm Drain at Redondo Beach	0	0	4	1	11	2
SMB 6-6	Malaga Cove, Palos Verdes Estates	0	0	1	1	3	1
SMB 7-1	Malaga Cove	0	0	1	1	14	2
SMB 7-2	Bluff Cove	0	0	1	1	0	0
SMB 7-3	Long Point	0	0	1	1	5	1
SMB 7-4	Abalone Cove	0	0	0	0	1	1
SMB 7-5	Portuguese Bend Cove	0	0	1	1	2	1
SMB 7-6	Royal Palms County Beach	0	0	1	1	6	1
SMB 7-8	Wilder Annex	0	0	1	1	2	1
SMB 7-9	Outer Cabrillo Beach	0	0	1	1	3	1

g. Permittees shall comply with the following geometric mean receiving water limitations for all shoreline monitoring stations along Santa Monica Bay beaches during dry weather as of the effective date of this Order and during wet weather no later than July 15, 2021:

Constituent	Geometric Mean (MPN or cfu)
Total coliform	1,000/100 mL
Fecal coliform	200/100 mL
Enterococcus	35/100 mL

h. Section A.4.g above shall not be applicable upon the effective date of the revised Santa Monica Bay Beaches Bacteria TMDL (Attachment A of Resolution No. R12-007). Upon the effective date of the revised Santa Monica Bay Beaches Bacteria TMDL, Permittees shall comply with the following geometric mean receiving water limitations for all shoreline monitoring stations along Santa Monica Bay beaches, calculated as defined in the revised Santa Monica Bay Beaches Bacteria TMDL, no later than July 15, 2021:

Constituent	Geometric Mean (MPN or cfu)
Total coliform	1,000/100 mL
Fecal coliform	200/100 mL
Enterococcus	35/100 mL

B. Santa Monica Bay Nearshore and Offshore Debris TMDL

1. Permittees subject to the provisions below are identified in Attachment K, Table K-2.

2. Permittees shall comply with the final water quality-based effluent limitation of zero trash discharged into water bodies within the Santa Monica Bay WMA and then into Santa Monica Bay or on the shoreline of Santa Monica Bay no later than March 20, 2020[7], and every year thereafter.

3. Permittees shall comply with interim and final water quality-based effluent limitations for trash discharged into Santa Monica Bay or on the shoreline of Santa Monica Bay, per the schedule below:

[7] If a Permittee by November 4, 2013, adopts local ordinances to ban plastic bags, smoking in public places and single use expanded polystyrene food packaging then the final compliance date will be extended until March 20, 2023.

Permittees	Baseline[8]	Mar 20, 2016 (80%)	Mar 20, 2017 (60%)	Mar 20, 2018 (40%)	Mar 20, 2019 (20%)	Mar 20, 2020[9] (0%)
		Annual Trash Discharge (gals/yr)				
Agoura Hills[10]	1,044	835	626	418	209	0
Calabasas[10]	1,656	1,325	994	663	331	0
Culver City	52	42	31	21	10	0
El Segundo	2,732	2,186	1,639	1,093	546	0
Hermosa Beach	1,117	894	670	447	223	0
Los Angeles, City of	25,112	20,090	15,067	10,045	5,022	0
Los Angeles, County of	5,138	4,110	3,083	2,055	1,028	0
Malibu	5,809	4,648	3,486	2,324	1,162	0
Manhattan Beach	2,501	2,001	1,501	1,001	500	0
Palos Verdes Estates	3,346	2,677	2,007	1,338	669	0
Rancho Palos Verdes	7,254	5,803	4,353	2,902	1,451	0
Redondo Beach	3,197	2,558	1,918	1,279	639	0
Rolling Hills	515	412	309	206	103	0
Rolling Hills Estates	365	292	219	146	73	0
Santa Monica	5,672	4,537	3,403	2,269	1,134	0
Torrance	2,484	1,987	1,490	993	497	0
Westlake Village[10]	3,131	2,505	1,879	1,252	626	0

4. Permittees shall comply with the interim and final water quality-based effluent limitations for trash in B.2 and B.3 above per the provisions in Part VI.E.5.

C. Santa Monica Bay TMDL for DDTs and PCBs (USEPA established)

1. Permittees subject to the provisions below are identified in Attachment K, Table K-2.

2. Permittees shall comply with the following WLAs, expressed as an annual loading of pollutants from the sediment discharged to Santa Monica Bay, per the provisions in Part VI.E.3:

Constituent	Annual Mass-Based WLA (g/yr)
DDT	27.08
PCBs	140.25

[8] If a Permittee elects not to use the default baseline, then the Permittee shall include a plan to establish a site specific trash baseline in their Trash Monitoring and Reporting Plan.

[9] Permittees shall achieve their final effluent limitation of zero trash discharge for the 2019-2020 storm year and every year thereafter.

[10] Permittees shall be deemed in compliance with the water quality-based effluent limitation for trash established to implement the Santa Monica Bay Nearshore and Offshore Debris TMDL, if the Permittee is in compliance with the water quality-based effluent limitations established to implement the Malibu Creek Watershed Trash TMDL.

3. Compliance shall be determined based on a three-year averaging period.

D. TMDLs in the Malibu Creek Subwatershed

1. Malibu Creek and Lagoon Bacteria TMDL

a. Permittees subject to the provisions below are identified in Attachment K, Table K-2.

b. Water Quality-Based Effluent Limitations

i. Permittees shall comply with the following final water quality-based effluent limitations for discharges to Malibu Lagoon during dry weather as of the effective date of this Order, and during wet weather no later than July 15, 2021:

Constituent	Effluent Limitations (MPN or cfu)	
	Daily Maximum	Geometric Mean
Total coliform*	10,000/100 mL	1,000/100 mL
Fecal coliform	400/100 mL	200/100 mL
Enterococcus	104/100 mL	35/100 mL

* Total coliform density shall not exceed a daily maximum of 1,000/100 mL, if the ratio of fecal-to-total coliform exceeds 0.1.

ii. Section D.1.b.i above shall not be applicable upon the effective date of the revised Malibu Creek and Lagoon Bacteria TMDL (Attachment A of Resolution No. R12-009). Upon the effective date of the revised Malibu Creek and Lagoon Bacteria TMDL, Permittees shall comply with the following daily maximum final water quality-based effluent limitations for discharges to Malibu Lagoon during dry weather as of the effective date of the revised Malibu Creek and Lagoon Bacteria TMDL and during wet weather no later than July 15, 2021. Permittees shall comply with the following geometric mean final water quality-based effluent limitations for each monitoring location, calculated as defined in the revised Malibu Creek and Lagoon Bacteria TMDL, no later than July 15, 2021.

Constituent	Effluent Limitations (MPN or cfu)	
	Daily Maximum	Geometric Mean
Total coliform*	10,000/100 mL	1,000/100 mL
Fecal coliform	400/100 mL	200/100 mL
Enterococcus	104/100 mL	35/100 mL

* Total coliform density shall not exceed a daily maximum of 1,000/100 mL, if the ratio of fecal-to-total coliform exceeds 0.1.

iii. Permittees shall comply with the following final water quality-based effluent limitations for discharges to Malibu Creek and its tributaries during dry weather as of the effective date of this Order, and during wet weather no later than July 15, 2021:

Constituent	Effluent Limitation (MPN or cfu)	
	Daily Maximum	Geometric Mean
E. coli	235/100 mL	126/100 mL

iv. Section D.1.b.iii above shall not be applicable upon the effective date of the revised Malibu Creek and Lagoon Bacteria TMDL (Attachment A of Resolution No. R12-009). Upon the effective date of the revised Malibu Creek and Lagoon Bacteria TMDL, Permittees shall comply with the following daily maximum final water quality-based effluent limitations for discharges to Malibu Creek and its tributaries during dry weather as of the effective date of the revised Malibu Creek and Lagoon Bacteria TMDL and during wet weather no later than July 15, 2021. Permittees shall comply with the following geometric mean final water quality-based effluent limitations for each monitoring location, calculated as defined in the revised Malibu Creek and Lagoon Bacteria TMDL, no later than July 15, 2021.

Constituent	Effluent Limitation (MPN or cfu)	
	Daily Maximum	Geometric Mean
E. coli	235/100 mL	126/100 mL

c. Receiving Water Limitations

i. Permittees shall comply with the following grouped[11] final single sample bacteria receiving water limitations for Malibu Creek, its tributaries, and Malibu Lagoon during dry weather as of the effective date of this Order, and during wet weather no later than July 15, 2021:

Time Period	Annual Allowable Exceedance Days of the Single Sample Objective (days)	
	Daily Sampling	Weekly Sampling
Summer Dry-Weather (April 1 to October 31)	0	0
Winter Dry-Weather (November 1 to March 31)	3	1
Wet Weather[12] (Year-round)	17	3

ii. Section D.1.c.i above shall not be applicable upon the effective date of the revised Malibu Creek and Lagoon Bacteria TMDL (Attachment A of Resolution No. R12-009). Upon the effective date of the revised Malibu Creek and Lagoon Bacteria TMDL, Permittees shall comply with the following grouped[13] final single sample bacteria receiving water limitations for each monitoring location within Malibu Creek and its tributaries during

[11] The final receiving water limitations are group-based and shared among all MS4 Permittees located within the drainage area to the receiving water.
[12] Wet weather is defined as days with 0.1 inch of rain or greater and the three days following the rain event.
[13] The final receiving water limitations are group-based and shared among all MS4 Permittees located within the drainage area to the receiving water.

dry weather as of the effective date of the revised Malibu Creek and Lagoon Bacteria TMDL and during wet weather no later than July 15, 2021:

Time Period	Annual Allowable Exceedance Days of the Single Sample Objective (days)	
	Daily Sampling	Weekly Sampling
Dry-Weather (Year-round)	5	1
Wet Weather[14] (Year-round)	15	2

iii. Section D.1.c.i above shall not be applicable upon the effective date of the revised Malibu Creek and Lagoon Bacteria TMDL (Attachment A of Resolution No. R12-009). Upon the effective date of the revised Malibu Creek and Lagoon Bacteria TMDL, Permittees shall comply with the following grouped[15] final single sample bacteria receiving water limitations for each monitoring location within Malibu Lagoon during dry weather as of the effective date of the revised Malibu Creek and Lagoon Bacteria TMDL and during wet weather no later than July 15, 2021:

Time Period	Annual Allowable Exceedance Days of the Single Sample Objective (days)	
	Daily Sampling	Weekly Sampling
Summer Dry-Weather (April 1 to October 31)	0	0
Winter Dry-Weather (November 1 to March 31)	9	2
Wet Weather[16] (Year-round)	17	3

iv. Permittees shall comply with the following geometric mean receiving water limitations for discharges to Malibu Lagoon during dry weather as of the effective date of this Order, and during wet weather no later than July 15, 2021:

Constituent	Geometric Mean (MPN or cfu)
Total coliform	1,000/100 mL
Fecal coliform	200/100 mL
Enterococcus	35/100 mL

v. Section D.1.c.iv above shall not be applicable upon the effective date of the revised Malibu Creek and Lagoon Bacteria TMDL (Attachment A of

[14] Wet weather is defined as days with 0.1 inch of rain or greater and the three days following the rain event.
[15] The final receiving water limitations are group-based and shared among all MS4 Permittees located within the drainage area to the receiving water.
[16] Wet weather is defined as days with 0.1 inch of rain or greater and the three days following the rain event.

Resolution No. R12-009). Upon the effective date of the revised Malibu Creek and Lagoon Bacteria TMDL, Permittees shall comply with the following geometric mean receiving water limitations for discharges to Malibu Lagoon, calculated as defined in the revised Malibu Creek and Lagoon Bacteria TMDL, no later than July 15, 2021:

Constituent	Geometric Mean (MPN or cfu)
Total coliform	1,000/100 mL
Fecal coliform	200/100 mL
Enterococcus	35/100 mL

vi. Permittees shall comply with the following geometric mean receiving water limitation for discharges to Malibu Creek and its tributaries during dry weather as of the effective date of this Order, and during wet weather no later than July 15, 2021:

Constituent	Geometric Mean (MPN or cfu)
E. coli	126/100 mL

vii. Section D.1.c.vi above shall not be applicable upon the effective date of the revised Malibu Creek and Lagoon Bacteria TMDL (Attachment A of Resolution No. R12-009). Upon the effective date of the revised Malibu Creek and Lagoon Bacteria TMDL, Permittees shall comply with the following geometric mean receiving water limitations for discharges to Malibu Creek and its tributaries, calculated as defined in the revised Malibu Creek and Lagoon Bacteria TMDL, no later than July 15, 2021:

Constituent	Geometric Mean (MPN or cfu)
E. coli	126/100 mL

2. Malibu Creek Watershed Trash TMDL

a. Permittees subject to the provisions below are identified in Attachment K, Table K-2.

b. Permittees shall comply with the final water quality-based effluent limitation of zero trash discharged to Malibu Creek from Malibu Lagoon to Malibou Lake, Malibu Lagoon, Malibou Lake, Medea Creek, Lindero Creek, Lake Lindero, and Las Virgenes Creek in the Malibu Creek Watershed no later than July 7, 2017 and every year thereafter.

c. Permittees shall comply with interim and final water quality-based effluent limitations for trash discharged to the Malibu Creek, per the schedule below:

Permittees	Baseline	July 7, 2013 (80%)	July 7, 2014 (60%)	July 7, 2015 (40%)	July 7, 2016 (20%)	July 7, 2017 (0%)
	Annual Trash Discharge (gals/yr)					
Agoura Hills	1810	1448	1086	724	362	0
Calabasas	673	539	404	269	135	0
Hidden Hills	71	57	43	28	14	0
Los Angeles County	1117	894	670	447	223	0
Malibu	226	181	136	91	45	0
Westlake Village	143	114	86	57	29	0

d. Permittees shall comply with the interim and final water quality-based effluent limitations for trash in D.2.b and D.2.c above per the provisions in Part VI.E.5.

3. Malibu Creek Watershed Nutrients TMDL (*USEPA established*)

a. Permittees subject to the provisions below are identified in Attachment K, Table K-2.

b. Permittees shall comply with the following grouped[17] WLAs per the provisions in Part VI.E.3 for discharges to Westlake Lake, Lake Lindero, Lindero Creek, Las Virgenes Creek, Medea Creek, Malibou Lake, Malibu Creek and Malibu Lagoon and its tributaries. Tributaries to Malibu Creek and Lagoon, include the following upstream water bodies; Triunfo Creek, Palo Comado Creek, Cheesebro Creek, Strokes Creek and Cold Creek.

Time Period	WLA	
	Nitrate as Nitrogen plus Nitrite as Nitrogen	Total Phosphorus
	Daily Maximum	Daily Maximum
Summer (April 15 to November 15)[18]	8 lbs/day	0.8 lbs/day
Winter (November 16 to April 14)	8 mg/L	n/a

E. TMDLs in the Ballona Creek Subwatershed

1. Ballona Creek Trash TMDL

a. Permittees subject to the provisions below are identified in Attachment K, Table K-3.

[17] USEPA was unable to specifically distinguish the amounts of pollutant loads from allocation categories associated with areas regulated by the storm water permits. Therefore, allocations for storm water permits are grouped.

[18] The mass-based summer WLAs are calculated as the sum of the allocations for "runoff from developed areas" and "dry weather urban runoff."

b. Permittees shall comply with the final water quality-based effluent limitation of zero trash discharged to Ballona Creek no later than September 30, 2015 and every year thereafter.

c. Permittees shall comply with the interim and final water quality-based effluent limitations for trash discharged to Ballona Creek, per the schedule below:

Ballona Creek Subwatershed Trash Effluent Limitations per Storm Year[19] (pounds of drip-dry trash)

Permittees	Baseline	Sept 30, 2012 (20%)	Sept 30, 2013 (10%)	Sept 30, 2014 (3.3%)	Sept 30, 2015[20] (0%)
		Annual Trash Discharge (pounds of trash)			
Beverly Hills	70,712	14,142	7,071	2,333	0
Culver City	37,271	7,454	3,727	1,230	0
Inglewood	22,324	4,465	2,232	737	0
Los Angeles, City of	942,720	188,544	94,272	31,110	0
Los Angeles, County of	52,693	10,539	5,269	1,739	0
Santa Monica	2,579	516	258	85	0
West Hollywood	13,411	2,682	1,341	443	0

Ballona Creek Subwatershed Trash Effluent Limitations per Storm Year[19] (gallons of uncompressed trash)

Permittees	Baseline	Sept 30, 2012 (20%)	Sept 30, 2013 (10%)	Sept 30, 2014 (3.3%)	Sept 30, 2015[20] (0%)
		Annual Trash Discharge (gallons of uncompressed trash)			
Beverly Hills	45,336	9,067	4,534	1,496	0
Culver City	25,081	5,016	2,508	828	0
Inglewood	14,717	2,943	1,472	486	0
Los Angeles, City of	602,068	120,414	60,207	19,868	0
Los Angeles, County of	32,679	6,536	3,268	1,078	0
Santa Monica	1,749	350	175	58	0
West Hollywood	9,360	1,872	936	309	0

d. Permittees shall comply with the interim and final water quality-based effluent limitations for trash in E.1.b and E.1.c above per the provisions in Part VI.E.5.

[19] For purposes of the provisions in this subpart, a storm year is defined as October 1 to September 30.
[20] Permittees shall achieve their final water quality-based effluent limitation of zero trash discharged for the 2014-2015 storm year and every year thereafter.

2. Ballona Creek Estuary Toxic Pollutants TMDL

a. Permittees subject to the provisions below are identified in Attachment K, Table K-3.

b. Permittees shall comply with the following final water quality-based effluent limitations no later than January 11, 2021, expressed as an annual loading of sediment-bound pollutants deposited to Ballona Creek Estuary:

Constituent	Effluent Limitations	
	Annual	Units
Cadmium	8.0	kg/yr
Copper	227.3	kg/yr
Lead	312.3	kg/yr
Silver	6.69	kg/yr
Zinc	1003	kg/yr
Chlordane	3.34	g/yr
DDTs	10.56	g/yr
Total PCBs	152	g/yr
Total PAHs	26,900	g/yr

c. Permittees shall comply with interim and final water quality-based effluent limitations for sediment-bound pollutant loads deposited to Ballona Creek Estuary, per the schedule below:

Deadline	Total Drainage Area Served by the MS4 required to meet the water quality-based effluent limitations (%)
January 11, 2013	25
January 11, 2015	50
January 11, 2017	75
January 11, 2021	100

d. Permittees shall be deemed in compliance with the water quality-based effluent limitations in Part E.2.b by demonstrating any one of the following:

i. Final water quality-based effluent limitations for sediment-bound pollutants deposited to Ballona Creek Estuary are met; or

ii. The sediment numeric targets as defined in the TMDL are met in bed sediments; or

iii. Concentrations of sediments discharged meet the numeric targets for sediment as defined in the TMDL.

3. Ballona Creek, Ballona Estuary and Sepulveda Channel Bacteria TMDL

a. Permittees subject to the provisions below are identified in Attachment K, Table K-3.

b. Water Quality-Based Effluent Limitations

i. Permittees shall comply with the following final water quality-based effluent limitations for discharges to Ballona Creek Estuary during dry weather no later than April 27, 2013, and during wet weather no later than July 15, 2021:

Constituent	Effluent Limitations (MPN or cfu)	
	Daily Maximum	Geometric Mean
Total coliform*	10,000/100 mL	1,000/100 mL
Fecal coliform	400/100 mL	200/100 mL
Enterococcus	104/100 mL	35/100 mL

* Total coliform density shall not exceed a daily maximum of 1,000/100 mL, if the ratio of fecal-to-total coliform exceeds 0.1.

ii. Section E.3.b.i above shall not be applicable upon the effective date of the revised Ballona Creek, Ballona Estuary and Sepulveda Channel Bacteria TMDL (Attachment A of Resolution No. R12-008). Upon the effective date of the revised Ballona Creek, Ballona Estuary and Sepulveda Channel Bacteria TMDL, Permittees shall comply with the following daily maximum final water quality-based effluent limitations for discharges to Ballona Creek Estuary during dry weather no later than April 27, 2013, and during wet weather no later than July 15, 2021. Permittees shall comply with the following geometric mean final water quality-based effluent limitations for each monitoring location, calculated as defined in the revised Ballona Creek, Ballona Estuary and Sepulveda Channel Bacteria TMDL, no later than July 15, 2021.

Constituent	Effluent Limitations (MPN or cfu)	
	Daily Maximum	Geometric Mean
Total coliform*	10,000/100 mL	1,000/100 mL
Fecal coliform	400/100 mL	200/100 mL
Enterococcus	104/100 mL	35/100 mL

* Total coliform density shall not exceed a daily maximum of 1,000/100 mL, if the ratio of fecal-to-total coliform exceeds 0.1.

iii. Permittees shall comply with the following final water quality-based effluent limitations for discharges to Sepulveda Channel during dry weather no later than April 27, 2013, and during wet weather no later than July 15, 2021:

Constituent	Effluent Limitation (MPN or cfu)	
	Daily Maximum	Geometric Mean
E. coli	235/100 mL	126/100 mL

iv. Section E.3.b.iii above shall not be applicable upon the effective date of the revised Ballona Creek, Ballona Estuary and Sepulveda Channel Bacteria

TMDL (Attachment A of Resolution No. R12-008). Upon the effective date of the revised Ballona Creek, Ballona Estuary and Sepulveda Channel Bacteria TMDL, Permittees shall comply with the following daily maximum final water quality-based effluent limitations for discharges to Sepulveda Channel during dry weather no later than April 27, 2013, and during wet weather no later than July 15, 2021. Permittees shall comply with the following geometric mean final water quality-based effluent limitations for each monitoring location, calculated as defined in the revised Ballona Creek, Ballona Estuary and Sepulveda Channel Bacteria TMDL, no later than July 15, 2021.

Constituent	Effluent Limitation (MPN or cfu)	
	Daily Maximum	Geometric Mean
E. coli	235/100 mL	126/100 mL

v. Permittees shall comply with the following final water quality-based effluent limitations for discharges to Ballona Creek Reach 2 during dry weather no later than April 27, 2013, and during wet weather no later than July 15, 2021:

Constituent	Effluent Limitation (MPN or cfu)	
	Daily Maximum	Geometric Mean
E. coli	576/100 mL	126/100 mL

vi. Section E.3.b.v above shall not be applicable upon the effective date of the revised Ballona Creek, Ballona Estuary and Sepulveda Channel Bacteria TMDL (Attachment A of Resolution No. R12-008). Upon the effective date of the revised Ballona Creek, Ballona Estuary and Sepulveda Channel Bacteria TMDL, Permittees shall comply with the following daily maximum final water quality-based effluent limitations for discharges to Ballona Creek Reach 2 during dry weather no later than April 27, 2013, and during wet weather no later than July 15, 2021. Permittees shall comply with the following geometric mean final water quality-based effluent limitations for each monitoring location, calculated as defined in the revised Ballona Creek, Ballona Estuary and Sepulveda Channel Bacteria TMDL, no later than July 15, 2021.

Constituent	Effluent Limitation (MPN or cfu)	
	Daily Maximum	Geometric Mean
E. coli	576/100 mL	126/100 mL

vii. Permittees shall comply with the following final water quality-based effluent limitations for discharges to Ballona Creek Reach 1 during dry weather no later than April 27, 2013, and during wet weather no later than July 15, 2021:

Constituent	Effluent Limitation (MPN or cfu)	
	Daily Maximum	Geometric Mean
Fecal coliform	4000/100 mL	2000/100 mL

viii. Section E.3.b.vii above shall not be applicable upon the effective date of the revised Ballona Creek, Ballona Estuary and Sepulveda Channel Bacteria TMDL (Attachment A of Resolution No. R12-008). Upon the effective date of the revised Ballona Creek, Ballona Estuary and Sepulveda Channel Bacteria TMDL, Permittees shall comply with the following daily maximum final water quality-based effluent limitations for discharges to Ballona Creek Reach 1 during dry weather no later than April 27, 2013, and during wet weather no later than July 15, 2021. Permittees shall comply with the following geometric mean final water quality-based effluent limitations for each monitoring location, calculated as defined in the revised Ballona Creek, Ballona Estuary and Sepulveda Channel Bacteria TMDL, no later than July 15, 2021.

Constituent	Effluent Limitation (MPN or cfu)	
	Daily Maximum	Geometric Mean
Fecal coliform	4000/100 mL	2000/100 mL

c. Receiving Water Limitations

i. Permittees shall comply with the following grouped[21] single sample bacteria receiving water limitations for Ballona Creek Estuary; Ballona Creek Reach 2 at the confluence with Ballona Creek Estuary; Centinela Creek at the confluence with Ballona Creek Estuary; Ballona Creek Reach 2; Ballona Creek Reach 1 at the confluence with Reach 2; Benedict Canyon Channel at the confluence with Ballona Creek Reach 2; and Sepulveda Channel:

Time Period	Annual Allowable Exceedance Days of the Single Sample Objective*		Deadline
	Daily Sampling	Weekly Sampling	
Summer Dry-Weather (April 1 to October 31)	0	0	April 27, 2013
Winter Dry-Weather (November 1 to March 31)	3	1	April 27, 2013
Wet Weather[22] (Year-round)	17**	3	July 15, 2021

* Exceedance days for Ballona Creek Estuary and at the confluence with Ballona Creek Estuary based on REC-1 marine water single sample bacteria water quality objectives (WQO). Exceedance days for Ballona Creek Reach 2 and at the confluence with Ballona Creek Reach 2 based on LREC-1 freshwater single sample bacteria WQO. Exceedance days for Sepulveda Channel based on REC-1 freshwater single sample bacteria WQO.

** In Ballona Creek Reach 2 and at the confluence with Reach 2, the greater of the allowable exceedance days under the reference system approach or high flow suspension shall apply.

ii. Section E.3.c.i above shall not be applicable upon the effective date of the revised Ballona Creek, Ballona Estuary and Sepulveda Channel Bacteria TMDL (Attachment A of Resolution No. R12-008). Upon the effective date of the revised Ballona Creek, Ballona Estuary and Sepulveda Channel Bacteria

[21] The final receiving water limitations are group-based and shared among all MS4 Permittees located within the drainage area.

[22] Wet weather is defined as days with 0.1 inch of rain or greater and the three days following the rain event.

TMDL, Permittees shall comply with the following grouped[23] single sample bacteria receiving water limitations for Ballona Creek Estuary; Ballona Creek Reach 2 at the confluence with Ballona Creek Estuary; and Centinela Creek at the confluence with Ballona Creek Estuary:

Time Period	Annual Allowable Exceedance Days of the REC-1 Marine Water Single Sample Bacteria Water Quality Objectives		Deadline
	Daily Sampling	Weekly Sampling	
Summer Dry-Weather (April 1 to October 31)	0	0	April 27, 2013
Winter Dry-Weather (November 1 to March 31)	9	2	April 27, 2013
Wet Weather[24] (Year-round)	17	3	July 15, 2021

iii. Section E.3.c.i above shall not be applicable upon the effective date of the revised Ballona Creek, Ballona Estuary and Sepulveda Channel Bacteria TMDL (Attachment A of Resolution No. R12-008). Upon the effective date of the revised Ballona Creek, Ballona Estuary and Sepulveda Channel Bacteria TMDL, Permittees shall comply with the following grouped[25] single sample bacteria receiving water limitations for Sepulveda Channel:

Time Period	Annual Allowable Exceedance Days of the REC-1 Fresh Water Single Sample Bacteria Water Quality Objectives		Deadline
	Daily Sampling	Weekly Sampling	
Dry-Weather	5	1	April 27, 2013
Wet Weather[26]	15	2	July 15, 2021

iv. Section E.3.c.i above shall not be applicable upon the effective date of the revised Ballona Creek, Ballona Estuary and Sepulveda Channel Bacteria TMDL (Attachment A of Resolution No. R12-008). Upon the effective date of the revised Ballona Creek, Ballona Estuary and Sepulveda Channel Bacteria TMDL, Permittees shall comply with the following grouped[27] single sample bacteria receiving water limitations for Ballona Creek Reach 2; Ballona Creek Reach 1 at the confluence with Reach 2; and Benedict Canyon Channel at the confluence with Ballona Creek Reach 2:

[23] The final receiving water limitations are group-based and shared among all MS4 Permittees located within the drainage area.
[24] Wet weather is defined as days with 0.1 inch of rain or greater and the three days following the rain event.
[25] The final receiving water limitations are group-based and shared among all MS4 Permittees located within the drainage area.
[26] Wet weather is defined as days with 0.1 inch of rain or greater and the three days following the rain event.
[27] The final receiving water limitations are group-based and shared among all MS4 Permittees located within the drainage area.

Time Period	Annual Allowable Exceedance Days of the LREC-1 Fresh Water Single Sample Bacteria Water Quality Objectives		Deadline
	Daily Sampling	Weekly Sampling	
Dry-Weather	5	1	April 27, 2013
Wet Weather[28]	15*	2	July 15, 2021

* In Ballona Creek Reach 2 and at the confluence with Reach 2, the greater of the allowable exceedance days under the reference system approach or high flow suspension shall apply.

v. Permittees shall not exceed the single sample bacteria objective of 4000/100 ml in more than 10% of the samples collected from Ballona Creek Reach 1 during any 30-day period. Permittees shall achieve compliance with this receiving water limitation during dry weather no later than April 27, 2013, and during wet weather no later than July 15, 2021.

vi. Permittees shall comply with the following geometric mean receiving water limitations for discharges to Ballona Creek Estuary; Ballona Creek Reach 2 at the confluence with Ballona Creek Estuary; and Centinela Creek at the confluence with Ballona Creek Estuary during dry weather no later than April 27, 2013, and during wet weather no later than July 15, 2021:

Constituent	Geometric Mean (MPN or cfu)
Total coliform	1,000/100 mL
Fecal coliform	200/100 mL
Enterococcus	35/100 mL

vii. Section E.3.c.vi above shall not be applicable upon the effective date of the revised Ballona Creek, Ballona Estuary and Sepulveda Channel Bacteria TMDL (Attachment A of Resolution No. R12-008). Upon the effective date of the revised Ballona Creek, Ballona Estuary and Sepulveda Channel Bacteria TMDL, Permittees shall comply with the following geometric mean receiving water limitations for discharges to Ballona Creek Estuary; Ballona Creek Reach 2 at the confluence with Ballona Creek Estuary; and Centinela Creek at the confluence with Ballona Creek Estuary, calculated as defined in the revised TMDL, no later than July 15, 2021:

Constituent	Geometric Mean (MPN or cfu)
Total coliform	1,000/100 mL
Fecal coliform	200/100 mL
Enterococcus	35/100 mL

viii. Permittees shall comply with the following geometric mean receiving water limitation for discharges to Ballona Creek Reach 2; Ballona Creek Reach 1 at

[28] Wet weather is defined as days with 0.1 inch of rain or greater and the three days following the rain event.

the confluence with Ballona Creek Reach 2; Benedict Canyon Channel at the confluence with Ballona Creek Reach 2; and Sepulveda Channel during dry weather no later than April 27, 2013, and during wet weather no later than July 15, 2021:

Constituent	Geometric Mean (MPN or cfu)
E. coli	126/100 mL

ix. Section E.3.c.viii above shall not be applicable upon the effective date of the revised Ballona Creek, Ballona Estuary and Sepulveda Channel Bacteria TMDL (Attachment A of Resolution No. R12-008). Upon the effective date of the revised Ballona Creek, Ballona Estuary and Sepulveda Channel Bacteria TMDL, Permittees shall comply with the following geometric mean receiving water limitation for discharges to Ballona Creek Reach 2; Ballona Creek Reach 1 at the confluence with Ballona Creek Reach 2; Benedict Canyon Channel at the confluence with Ballona Creek Reach 2; and Sepulveda Channel, calculated as defined in the revised TMDL, no later than July 15, 2021:

Constituent	Geometric Mean (MPN or cfu)
E. coli	126/100 mL

x. Permittees shall comply with the following geometric mean receiving water limitation for discharges to Ballona Creek Reach 1 during dry weather no later than April 27, 2013, and during wet weather no later than July 15, 2021:

Constituent	Geometric Mean (MPN or cfu)
Fecal coliform	2000/100 mL

xi. Section E.3.c.x above shall not be applicable upon the effective date of the revised Ballona Creek, Ballona Estuary and Sepulveda Channel Bacteria TMDL (Attachment A of Resolution No. R12-008). Upon the effective date of the revised Ballona Creek, Ballona Estuary and Sepulveda Channel Bacteria TMDL, Permittees shall comply with the following geometric mean receiving water limitation for discharges to Ballona Creek Reach 1, calculated as defined in the revised TMDL, no later than July 15, 2021:

Constituent	Geometric Mean (MPN or cfu)
Fecal coliform	2000/100 mL

4. Ballona Creek Metals TMDL

a. Permittees subject to the provisions below are identified in Attachment K, Table K-3.

b. Final Water Quality-Based Effluent Limitations

i. Permittees shall comply with the following dry weather[29] water quality-based effluent limitations no later than January 11, 2016, expressed as total recoverable metals discharged to Ballona Creek and Sepulveda Channel:

Constituent	Effluent Limitation Daily Maximum (g/day)	
	Ballona Creek	Sepulveda Channel
Copper	807.7	365.6
Lead	432.6	196.1
Selenium	169	76
Zinc	10,273.1	4,646.4

ii. In lieu of calculating loads, Permittees may demonstrate compliance with the following concentration-based water quality-based effluent limitations during dry weather[30] no later than January 11, 2016, expressed as total recoverable metals discharged to Ballona Creek and Sepulveda Channel:

Constituent	Effluent Limitation Daily Maximum (µg/L)
Copper	24
Lead	13
Selenium	5
Zinc	304

iii. Permittees shall comply with the following wet weather[31] water quality-based effluent limitations no later than January 11, 2021, expressed as total recoverable metals discharged to Ballona Creek and its tributaries:

Constituent	Effluent Limitation Daily Maximum (g/day)
Copper	1.70×10^{-5} x daily storm volume (L)
Lead	5.58×10^{-5} x daily storm volume (L)
Selenium	4.73×10^{-6} x daily storm volume (L)
Zinc	1.13×10^{-4} x daily storm volume (L)

[29] Dry weather is defined as any day when the maximum daily flow in Ballona Creek is less than 40 cubic feet per second (cfs) measured at Sawtelle Avenue.
[30] Ibid.
[31] Wet weather is defined as any day when the maximum daily flow in Ballona Creek is equal to or greater than 40 cfs measured at Sawtelle Avenue.

c. Permittees shall comply with interim and final water quality-based effluent limitations for metals discharged to Ballona Creek and its tributaries, per the schedule below:

Deadline	Total Drainage Area Served by the MS4 required to meet the water quality-based effluent limitations (%)	
	Dry weather	Wet weather
January 11, 2012	50	25
January 11, 2014	75	--
January 11, 2016	100	50
January 11, 2021	100	100

5. Ballona Creek Wetlands TMDL for Sediment and Invasive Exotic Vegetation *(USEPA established)*

a. Permittees subject to the provisions below are identified in Attachment K, Table K-3.

b. Permittees shall comply with the following grouped[32] WLA per the provisions in Part VI.E.3 for discharges of sediment into Ballona Creek Wetlands:

Constituent	Annual WLA[33] (m^3/yr)
Total Sediment (suspended sediment plus sediment bed load)	44,615

F. TMDLs in Marina del Rey Subwatershed

1. Marina del Rey Harbor Mothers' Beach and Back Basins Bacteria TMDL

a. Permittees subject to the provisions below are identified in Attachment K, Table K-3.

b. Permittees shall comply with the following final water quality-based effluent limitations for discharges to Marina del Rey Harbor Beach and Back Basins D, E, and F during dry weather as of the effective date of this Order, and during wet weather no later than July 15, 2021:

Constituent	Effluent Limitations (MPN or cfu)	
	Daily Maximum	Geometric Mean
Total coliform*	10,000/100 mL	1,000/100 mL
Fecal coliform	400/100 mL	200/100 mL
Enterococcus	104/100 mL	35/100 mL

* Total coliform density shall not exceed a daily maximum of 1,000/100 mL, if the ratio of fecal-to-total coliform exceeds 0.1.

[32] The WLA is group-based and shared among all MS4 Permittees located within the drainage area.
[33] The WLA is applied as a 3-year average.

c. Section F.1.b above shall not be applicable upon the effective date of the revised Marina del Rey Harbor Mothers' Beach and Back Basins Bacteria TMDL (Attachment B of Resolution No. R12-007). Upon the effective date of the revised Marina del Rey Harbor Mothers' Beach and Back Basins Bacteria TMDL, Permittees shall comply with the following daily maximum final water quality-based effluent limitations for discharges to Marina del Rey Harbor Beach and Back Basins D, E, and F during dry weather as of the effective date of the revised Marina del Rey Harbor Mothers' Beach and Back Basins Bacteria TMDL and during wet weather no later than July 15, 2021. Permittees shall comply with the following geometric mean final water quality-based effluent limitations for each monitoring location, calculated as defined in the revised Marina del Rey Harbor Mothers' Beach and Back Basins Bacteria TMDL, no later than July 15, 2021.

Constituent	Effluent Limitations (MPN or cfu)	
	Daily Maximum	Geometric Mean
Total coliform*	10,000/100 mL	1,000/100 mL
Fecal coliform	400/100 mL	200/100 mL
Enterococcus	104/100 mL	35/100 mL

* Total coliform density shall not exceed a daily maximum of 1,000/100 mL, if the ratio of fecal-to-total coliform exceeds 0.1.

d. Receiving Water Limitations

i. Permittees shall comply with the following grouped[34] final single sample bacteria receiving water limitations for all monitoring stations at Marina Beach and Basins D, E, and F, except for those monitoring stations subject to the antidegradation implementation provision in the TMDL and identified in subpart iii. below, during dry weather as of the effective date of this Order and during wet weather no later than July 15, 2021.

Time Period	Annual Allowable Exceedance Days of the Single Sample Objective (days)	
	Daily Sampling	Weekly Sampling
Summer Dry-Weather (April 1 to October 31)	0	0
Winter Dry-Weather (November 1 to March 31)	3	1
Wet Weather[35] (Year-round)	17	3

ii. Section F.1.d.i above shall not be applicable upon the effective date of the revised Marina del Rey Harbor Mothers' Beach and Back Basins Bacteria TMDL (Attachment B of Resolution No. R12-007). Upon the effective date of the revised Marina del Rey Harbor Mothers' Beach and Back Basins Bacteria

[34] The final receiving water limitations are group-based and shared among all MS4 Permittees located within the drainage area.

[35] Wet weather is defined as days with 0.1 inch of rain or greater and the three days following the rain event.

TMDL, Permittees shall comply with the following grouped[36] final single sample bacteria receiving water limitations for all monitoring stations at Marina Beach and Basins D, E, and F, except for those monitoring stations subject to the antidegradation implementation provision in the TMDL and identified in subpart iv. below, during dry weather as of the effective date of the revised Marina del Rey Harbor Mothers' Beach and Back Basins Bacteria TMDL and during wet weather no later than July 15, 2021.

Time Period	**Annual Allowable Exceedance Days of the Single Sample Objective (days)**	
	Daily Sampling	**Weekly Sampling**
Summer Dry-Weather (April 1 to October 31)	0	0
Winter Dry-Weather (November 1 to March 31)	9	2
Wet Weather[37] (Year-round)	17	3

iii. Permittees shall comply with the following grouped[38] final single sample bacteria receiving water limitations for monitoring stations in Marina del Rey subject to the antidegradation implementation provision in the TMDL as of the effective date of this Order:

		Annual Allowable Exceedance Days of the Single Sample Objective (days)					
Station ID	Monitoring Location	Summer Dry-Weather (April 1 to October 31)		Winter Dry Weather (November 1 – March 31)		Wet Weather (Year-round)	
		Daily Sampling	Weekly Sampling	Daily Sampling	Weekly Sampling	Daily Sampling	Weekly Sampling
MdRH-9	Basin F, center of basin	0	0	3	1	8	1

iv. Section F.1.d.iii above shall not be applicable upon the effective date of the revised Marina del Rey Harbor Mothers' Beach and Back Basins Bacteria TMDL (Attachment B of Resolution No. R12-007). Upon the effective date of the revised Marina del Rey Harbor Mothers' Beach and Back Basins Bacteria TMDL, Permittees shall comply with the following grouped[39] final single sample bacteria receiving water limitations for monitoring stations in Marina del Rey subject to the antidegradation implementation provision in the TMDL as of the effective date of the revised Marina del Rey Harbor Mothers' Beach and Back Basins Bacteria TMDL:

[36] The final receiving water limitations are group-based and shared among all MS4 Permittees located within the drainage area.
[37] Wet weather is defined as days with 0.1 inch of rain or greater and the three days following the rain event.
[38] The final receiving water limitations are group-based and shared among all MS4 Permittees located within the drainage area.
[39] The final receiving water limitations are group-based and shared among all MS4 Permittees located within the drainage area.

		Annual Allowable Exceedance Days of the Single Sample Objective (days)					
Station ID	Monitoring Location	Summer Dry-Weather (April 1 to October 31)		Winter Dry Weather (November 1 – March 31)		Wet Weather (Year-round)	
		Daily Sampling	Weekly Sampling	Daily Sampling	Weekly Sampling	Daily Sampling	Weekly Sampling
MdRH-9	Basin F, center of basin	0	0	9	2	8	1

v. Permittees shall comply with the following geometric mean receiving water limitations for monitoring stations at Marina Beach and Basins D, E, and F during dry weather as of the effective date of this Order, and during wet weather no later than July 15, 2021:

Constituent	**Geometric Mean (MPN or cfu)**
Total coliform	1,000/100 mL
Fecal coliform	200/100 mL
Enterococcus	35/100 mL

vi. Section F.1.d.v above shall not be applicable upon the effective date of the revised Marina del Rey Harbor Mothers' Beach and Back Basins Bacteria TMDL (Attachment B of Resolution No. R12-007). Upon the effective date of the revised Marina del Rey Harbor Mothers' Beach and Back Basins Bacteria TMDL, Permittees shall comply with the following geometric mean receiving water limitations for monitoring stations at Marina Beach and Basins D, E, and F, calculated as defined in the revised Marina del Rey Harbor Mothers' Beach and Back Basins Bacteria TMDL, no later than July 15, 2021:

Constituent	**Geometric Mean (MPN or cfu)**
Total coliform	1,000/100 mL
Fecal coliform	200/100 mL
Enterococcus	35/100 mL

2. Marina del Rey Harbor Toxic Pollutants TMDL

a. Permittees subject to the provisions below are identified in Attachment K, Table K-3.

b. Permittees shall comply with the following final water quality-based effluent limitations no later than March 22, 2016[40], expressed as an annual loading of pollutants associated with total suspended solids (TSS) discharged to Marina del Rey Harbor Back Basins D, E, and F:

[40] If an Integrated Water Resources Approach is approved by the Regional Water Board and implemented then the Permittees shall comply with the final water quality-based effluent limitations no later than March 22, 2021.

Constituent	Effluent Limitations	
	Annual	Units
Copper	2.01	kg/yr
Lead	2.75	kg/yr
Zinc	8.85	kg/yr
Chlordane	0.0295	g/yr
Total PCBs	1.34	g/yr

c. Permittees shall comply with interim and final water quality-based effluent limitations for pollutant loads associated with TSS discharged to Marina del Rey Harbor Back Basins D, E, and F, per the schedule below:

Deadline	Total Drainage Area Served by the MS4 required to meet the effluent limitations (%)
March 22, 2014	50
March 22, 2016	100

d. If an approved Integrated Water Resources Approach is implemented, Permittees shall comply with interim and final water quality-based effluent limitations for pollutant loads associated with TSS discharged to Marina del Rey Harbor Back Basins D, E, and F, per the schedule below:

Deadline	Total Drainage Area Served by the MS4 required to meet the effluent limitations (%)
March 22, 2013	25
March 22, 2015	50
March 22, 2017	75
March 22, 2021	100

e. Permittees shall be deemed in compliance with the water quality-based effluent limitations in Part F.2.b by demonstrating any one of the following:

i. Final water quality-based effluent limitations for pollutants associated with TSS discharged to Marina del Rey Harbor Back Basins D, E, and F are met; or

ii. The sediment numeric targets as defined in the TMDL are met in bed sediments; or

iii. Pollutant concentrations associated with TSS discharged meet the numeric targets for sediment as defined in the TMDL.

Andrew C. Jhun
Julie K. Jhun
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Los Angeles, California 90048
Tel: (510) 306-5194
Email: drewjhun@gmail.com

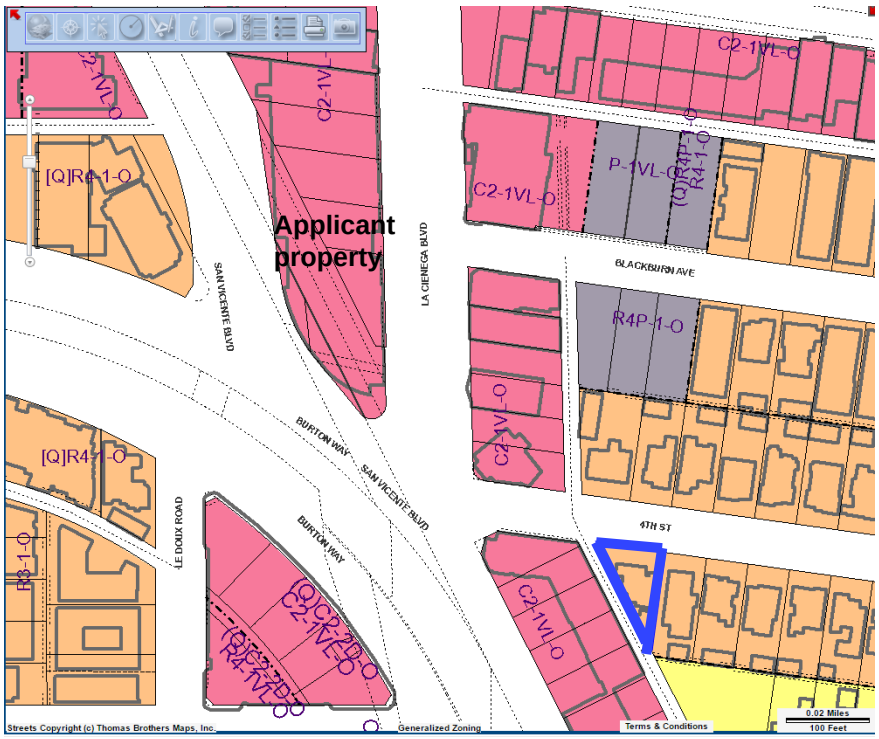
July 5, 2016

Alejandro A. Huerta
Major Projects & Environmental Analysis
Department of City Planning
City Hall, City of Los Angeles
200 North Spring Street, Room 750
Los Angeles, CA 90012
Email: alejandro.huerta@lacity.org

Re: *333 La Cienega Boulevard, Los Angeles, CA 90048*
CEQA No: *ENV-2015-897-EIR*
State Clearinghouse No.: *2016011061*

Dear Mr. Huerta:

Please let this serve as our comment regarding the above-captioned draft environmental impact report. We reside at 8460/8462 West 4th Street and are one of the first residential neighbors directly to the east of the subject property (see property outlined in blue below). 32-1



As the applicant notes, the property is subject to the Wilshire Community Plan which includes the following issues, goals and policies:

- "Transportation Issues:
  - Severe traffic congestion along most major transportation corridors and intersections, with many streets functioning in excess of full capacity
  - Overflow of traffic from congested commercial corridors negatively impacts the quality of life in residential neighborhoods
  - Insufficient off-street parking areas and structures, resulting in spillover parking from commercial areas into adjacent residential areas.
  - Many Collector Streets are lined with fronting residential land uses (single family homes and duplexes) with high volumes of traffic."

- "Goal 14: Discourage non-resident traffic flow on residential local streets, and encourage community involvement in determining neighborhood traffic and parking controls."

- "Policies 14-1.1 The City Planning Department and LADOT should continue to work closely with Wilshire Community Plan Area residents to identify existing and anticipated "cut-through" traffic and spillover parking from adjacent commercial areas. Through neighborhood community meetings, traffic calming programs and strategies could be developed for effective Residential Neighborhood Protection Plans.

  Program: Implement Residential Neighborhood Protection Plans to include traffic control monitoring programs to accomplish the following:
  ? Installation of proper traffic control devices.
  ? Analysis of effectiveness.
  ? Ensure that undesirable impacts on established residential neighborhoods are minimal.
  ? Examination of the need for additional controls"

32-2

Traffic study of intersection at La Cienega Boulevard and West 4th Street should be included: Absent from the draft report is any analysis of traffic impacts or overflow on West 4th Street. Accordingly, a further study is required for La Cienega Boulevard and West 4th Street.

A sample video of overflow traffic onto West Fourth Street taken on June 8, 2016 at 6:29 p.m. is incorporated herein which can be found at:

https://www.dropbox.com/sh/txf98u7al53gll7/AABAru1YGxIK70DPrQT_Ubtra?dl=0

Traffic studies of adjacent alleyways east of La Cienega between Blackburn and Colgate should be included: The project Applicant has analyzed traffic at the intersection of La Cienega and Blackburn and one of the areas for ingress and egress to the project would be located at that intersection. Accordingly, there is significant potential for traffic overflow from Blackburn onto the adjacent alleyway running parallel to La Cienega Boulevard. Presently, traffic flows through adjacent alleyways parallel to and immediately east of La Cienega running north and south between Blackburn Avenue, 4th Street, and Colgate Avenue. Further traffic studies for the alleyways should be included as well.

32-3

While the report at section 4.4 includes analyses of traffic at intersections located on La Cienega and Blackburn Avenue (marked as 17) and La Cienega and San Vicente Boulevard (marked as 18), the intersection at La Cienega and San Vicente Boulevard is ambiguous and requires further clarification. For example, San Vicente Boulevard at this intersection runs Northwest and Southeast and not a direct east/west direction. A right turn going westbound on San Vicente Boulevard could result in going north on La Cienega Boulevard and also potentially eastbound on West 4th Street.

Scope of time period for traffic counts should be expanded: The AM and PM peak period traffic counts should be revised to extend beyond 6:00 p.m. (see page 4.4-7). Given the existence of at least two major retail centers (Beverly Center, Beverly Connection) less than 500 feet north of the subject property, the scope of the traffic studies should be extended through retail hours and the conclusion under "Neighborhood Street Segments" at page 4.4-22 regarding "no significant impact related to neighborhood intrusion" is likely premature given that the conclusion is based on incomplete data.

32-4

Noise Impact, Construction Noise, Vibrations and Parking. Absent from the report is an analysis of noise or vibration to residential neighbors including ourselves who are located about 300 feet from the proposed project. Further analysis should be provided considering our household includes a 2 year old toddler. Additional analysis should be provided regarding where construction vehicles would be parked during construction and whether parking in adjacent residential neighborhoods (some of which are governed by preferential parking regulations) will occur and under what conditions.

32-5

32-6

We appreciate the opportunity to participate in this comment process and request notice and a reasonable opportunity to meaningfully and cooperatively work together with the planning department and the LADOT regarding the traffic and parking issues addressed herein and further issues regarding the proposed project.

Sincerely,

ANDREW JHUN
JULIE JHUN

---------- Forwarded message ----------
From: **Triglia, Gina** <Gina.Triglia@luxurycollection.com>
Date: Wed, Jul 6, 2016 at 8:55 AM
Subject: Support 333 LA Cienega - CASE# ENV-2015-897EIR
To: "alejandro.huerta@lacity.org" <alejandro.huerta@lacity.org>, "paul.koretz@lacity.com" <paul.koretz@lacity.com>, "shawn.bayliss@lacity.org" <shawn.bayliss@lacity.org>

Dear City of LA,

The SLS Hotel, A Luxury Collection Hotel, Beverly Hills supports the Caruso Affiliated/CRM Properties project at 333 La Cienega Boulevard. For Los Angeles, to grow in the right way, we need more housing density and retail projects along our major corridors – especially one that promotes walkability and are located along public transit route. Caruso's project is the perfect example of taking an outdated building and replacing it with just such a project. It's a great design including the addition of a new, outdoor plaza at La Cienega and San Vicente.

Their 8500 Burton Way apartment building across the street has always been well-maintained and great neighbors to have. The Trader Joe's and Larder restaurant have been great additions to the neighborhood by providing our guests with walkable shopping experience with quality service during their stay.

333 La Cienega is a good project and I appreciate the outreach by Caruso Affiliated to local neighbors and businesses over the past few years. Please support this project.

33-1

Sincerely,

Christophe Thomas

General Manager

SLS Hotel

A Luxury Collection Hotel, Beverly Hills

CT/gt

June 20, 2016

Alejandro Huerta
Environmental Analysis Section
Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012

Re: The Larder at Burton Way – Support for 333 S. La Cienega (Case #: ENV-2015-897 EIR)

Mr. Huerta:

On behalf of the Larder at Burton Way, we support the project proposed at 333 S. La Cienega and encourage timely approval by the City of Los Angeles.

The Larder at Burton Way is located directly across the street from 333 S. La Cienega. Opened in 2013 by Caroline Styne and Suzanne Goin, the Larder at Burton Way is a full service, casual, gourmet and sustainable eatery located within Caruso Affiliated's 8500 Burton Way residential building. The majority of our regular customers live and work in the surrounding neighborhood and walk here to dine or takeout. We are also the only restaurant in our vicinity offering outdoor, street front dining.

The 333 S. La Cienega project would provide two important community benefits. First, the project will bring 145 new apartment units to a city facing a severe housing shortage. The new residents will further enliven the neighborhood and improve the growing sense of community that we have experienced these past few years. Second, Caruso Affiliated has committed themselves to improving the area's crosswalks to make it safer and easier for everyone, including our customers, to walk across San Vicente, Burton Way, and La Cienega. This is absolutely critical for the long term success of our business and the quality of life for our customers.

In conclusion, the Larder at Burton Way supports this project.

34-1

Sincerely,

Caroline Styne
President
8474 Melrose Ave.
Los Angeles, CA 90069

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit

Edmund G. Brown Jr.
Governor

Ken Alex
Director

July 6, 2016

RECEIVED
CITY OF LOS ANGELES
JUL 12 2016
ENVIRONMENTAL UNIT

Alejandro Huerta
City of Los Angeles
200 N. Spring Street, Room 750
Los Angeles, CA 90012

Subject: 333 La Cienega Boulevard Project
SCH#: 2016011061

Dear Alejandro Huerta:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on July 5, 2016, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

35-1

Sincerely,

Scott Morgan
Director, State Clearinghouse

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

Document Details Report
State Clearinghouse Data Base

SCH# 2016011061
Project Title 333 La Cienega Boulevard Project
Lead Agency Los Angeles, City of

Type EIR Draft EIR

Description The proposed project would develop a 1.15-acre (50,216 sf) site with a mixed use, up to 20 story building with a total floor area of 294,294 sf consisting of 145 residential units and 31,055 sf of commercial uses. The commercial uses consist of 27,685 sf grocery market and 3,370 sf of restaurant space. The proposed structure would be approximately 240 ft in height and would include: a ground level with 3,923 sf of residential lobby space and 22,436 sf commercial (retail and restaurant) space; a mezzanine level with 8,619 sf of commercial space and 3,516 sf of residential lobby space; 145 residential units (Levels 5-19); and one level with amenities such as a pool, gym, spa, and lounge (level 20). There would be approximately 26,862 sf of usable common and private open space. The proposed project would provide 362 parking spaces.

Lead Agency Contact

Name Alejandro Huerta
Agency City of Los Angeles
Phone 213-978-1454 **Fax**
email
Address 200 N. Spring Street, Room 750
City Los Angeles **State** CA **Zip** 90012

Project Location

County Los Angeles
City Los Angeles, City of
Region
Lat / Long 34° 4' 21.89" N / 118° 22' 35.1" W
Cross Streets La Cienega Blvd. and San Vicente Blvd.
Parcel No. 4334-009-160
Township 1S **Range** 14W **Section** **Base**

Proximity to:

Highways U.S. 101
Airports
Railways
Waterways
Schools
Land Use C2-1VL-O Neighborhood Commercial Office

Project Issues Aesthetic/Visual; Noise; Traffic/Circulation; Growth Inducing; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 5; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 7; Native American Heritage Commission; State Water Resources Control Board, Division of Drinking Water, District 15; Regional Water Quality Control Board, Region 4

Date Received 05/19/2016 **Start of Review** 05/19/2016 **End of Review** 07/05/2016

Note: Blanks in data fields result from insufficient information provided by lead agency.

From: Bijan Vaziri [mailto:bvaziri@beverlyhills.org]
Sent: Wednesday, July 13, 2016 2:22 PM
To: Matthew Simons
Subject: RE: 333 La Cienega Blvd Project - Coordination on DEIR Comment Letter

Hello Matthew, sorry for the delay response to your call and e-mails, but I needed time to have clarification internally, before I can express the following comments:

1-
Our City Council members and our Planning Commissioners have expressed serious concerns about the City of Los Angeles allowing construction of mega structures in the vicinity of Beverly Hills particularly, within Century City and Beverly Center areas. Recently, in the light of a 40 story residential construction at the corner of the Beverly Hills intersection (10,000 Santa Monica project), our City Council ordered the staff to study an extreme traffic control measures such as placing bollards to protect the neighbors around this mega structure. There is nothing new about high rise construction in Los Angeles around Beverly Hills. However, over the years, our street network has reached beyond capacity, mostly because of passing through traffic generated by Los Angeles. Based on this background, the City decision makers have obligated staff to be very sensitive and responsible when reviewing a new project in LA to make sure that another example of the above does not happen. 36-1

2-
This brings us to the 333 La Cienega project where up to "50%" trip discount is allowed by LA based on internal trips and other non-generating modes. It appears when a such high rate of discount is given one would question the need of a traffic study at all. A "50%" discount triggers the question of applicability of the trip rate itself. We have reviewed hundreds of traffic impact studies and have never acknowledged a trip discount over 25%. This is regardless of national averages because we are in a special environment as Beverly Hills streets carry over 60% of pass through traffic including those who are a part of internal trips . 36-2

3-
In summary, The City of Beverly Hills objects the use of up to "50%" trip discount (40% +10%) for trips generated by the proposed 333 La Cienga Blvd project and consequently, the conclusion of "No Significant Impact" resulted by such a high rate of discount is not approved specially, on intersections within Beverly Hills and/or shared with Los Angeles. 36-3

4-
Please include these comments as a part of the Beverly Hills response to this project so it will be reflecte d in the project approval process. 36-4

Bijan Vaziri P.E.
Senior Traffic Engineer
City of Beverly Hills
bvaziri@beverlyhills.org

Marsha and Sheldon Kogod

321 South San Vicente Blvd. #707

Los Angeles, CA 90048

To: Alejandro Huerta, Planning Department

Faisal Alserri, City Council

Cary Brazerman, Mid City West Neighborhood Council

Ravi Bhatia, Mid City West Neighborhood Council

I currently own my Condominium located at 321 South San Vicente, Los Angeles, CA 90048, and have resided at this address for the past four years. Besides the fact that I was attracted to the layout of my unit when I first saw it, along with the building itself, I was drawn to the wonderful view we have from our sliding glass doors and patio of the East Side of the area and the ability to see all the way down towards the area of the grove. When we purchased our condo we were advised that there was a possibility a building may be built on the property across the street from us, but were assured that per the Zoning Commission, nothing larger than four stories could and would be built there in the future. This was not an issue as a building that only had four levels would not impact my view and would not bring to much added traffic.

I'm now being advised that Mr. Caruso is interested in obtaining permission to build a twenty story building in this lot with a supermarket, located within the same structure. A twenty story building in this location would block my entire view of the east, losing the morning sun light. Additionally, the addition of sixteen plus floors will increase traffic for additional tenants in this structure, as well as delivery trucks for the supermarket and restaurant, causing additional noise. The construction would take up to three years creating dirt and dust from the construction, as well as excessive noise from the construction equipment.

37-1

37-2

I have worked hard for sixty years in order to enjoy my condominium and view that I have now. The incredible view I have will be blocked and ultimately lower the value of my condominium at the time of resale. If the Zoning Board grants permission to Mr. Caruso to extend these rentals from four stories to twenty stories, they would be setting precedence for other builders to increase the size of their building added even more traffic concerns.

I strongly oppose this construction of a twenty story building for health, economic, and quality of life issues that would all affect my family. I do not agree allowing Mr. Caruso or anyone else for that matter, the ability to gain financially at someone else's expense and respectfully request the Zoning Board to stand my their decision of a four story building, as previously suggested,

Thank you in advance for your consideration in this matter s it is a detrimental decision that would adversely affect me and others.

37-3

Comment Letter 38

---------- Forwarded message ----------
From: **Jonathan Eldridge** <ceqacheck@gmail.com>
Date: Mon, Aug 1, 2016 at 10:42 PM
Subject: 333 La Cienega Comment
To: alejandro.huerta@lacity.org

Hello Alejandro,

First, I know I'm late to the party for this. However, this is more to keep in mind for future projects than this one in particular since I'm almost a month behind the comment period!

It appears that the consultant providing the noise analysis for the 333 La Cienega DEIR accidentally used the FHWA RD-77-108 noise model that has been outdated for approximately 18 years and is explicitly restricted for use by the FHWA (the agency which designed it - and subsequently designed the current model: TNM).

I worked in the CEQA/NEPA industry for 10 years as a technical specialist and can tell you that the only reason this model is in use is to cut corners and save money. There is no agency actively regulating noise (unless Federal or State project - and both FHWA and Caltrans would never let this slide) so consultants and agencies choose to use an inappropriate model to save money on the front end of projects at the expense of local residents and businesses.

I hope you are able to have your consultants revisit the noise analysis and update it using an appropriate model that isn't restricted by the agency which designed it.

Thanks for your time!
JE

38-1

P.S. Here are a couple quick references I gathered for you to review.

According to the FHWA (who created both the RD-77-108 and the newer TNM model which it recommends for all environmental review documentation):

"Prior to the release of the FHWA TNM, the FHWA Highway Traffic Noise Prediction Model (FHWA-RD-77- 108), or "108 model," was in use for over 20 years. Although an effective model for its time, the "108 model" was comprised of acoustic algorithms, computer architecture, and source code that dated to the 1970s. Since that time, significant advancements have been made in the methodology and technology for noise prediction, barrier analysis and design, and computer software design and coding. Given the fact that over $500 million were spent on barrier design and construction between 1970 and 1990, the FHWA identified the need to design, develop, test, and document a state-of-the-art highway traffic noise prediction model that utilized these advancements. This need for a new traffic noise prediction model resulted in the FHWA TNM.

The core vehicle noise emissions database for the "108 model" was collected in the mid 1970s. Because of the age and associated limitations with this database (e.g., no data for vehicles on grade or vehicles subject to interrupted-flow conditions), it was essential that a state-of-the-art, nationally representative database be developed for the FHWA TNM." (http://www.fhwa.dot.gov/environment/noise/traffic_noise_model/)

And according to Caltrans:

"The FHWA TNM was released on March 30, 1998. FHWA mandated that all new federal-aid highway projects that begin after January 15, 2006, be evaluated using TNM." (http://www.dot.ca.gov/hq/env/noise/pub/TeNS_Sept_2013B.pdf)

Granted, the project may not be getting any Federal dollars, it is clear that the agency which designed both noise models expressly prohibits the use of the old, outdated model as it is extremely old, and there is a significantly better model available (TNM).

38-1

Comment Letter 39

Beverly Hills Institute

Alex Foxman, MD, Inc.

Internal and Preventive Medicine

9400 Brighton Way • Suite 410 • Beverly Hills • CA • 90210
Tel: 310.274.0657 • Fax: 310.274.6083 • www.bhinstitute.com

August 15, 2016 Sent via Facsimile and E-mail

Alejandro Huerta
Environmental Analysis Section
Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012
Fax (213) 978-1343
alejandro.huerta@lacity.org

Re: 333 South La Cienega Project Letter of Support

Dear Mr. Huerta,

On February 25, 2016, I had written to you regarding my concerns regarding the 333 South La Cienega apartment project. Since that letter, I have had an opportunity to carefully and in detail evaluate the entire project including the Environmental Impact Report and other issues stated previously. I have had many discussions with other local residents and the Westbury Terrace HOA. In addition, I have had the opportunity to personally meet with CRM and Mr. Rick Caruso, who further provided me with detailed information that I have used for my current decision.

As an east facing condo owner at Westbury Terrace the condominium complex closest to the 333 S. La Cienega Blvd project, I would like to give my full support to the project, as proposed by CRM/Caruso and in its' entirety.

39-1

Sincerely,

Alex Foxman, M.D., F.A.C.P.

Comment Letter 40

Sameer Chopra

321 South San Vicente Blvd., Unit 803• Los Angeles, CA 90048• Phone: 310-927-0624 • Fax: 559-686-2016
E-Mail: sameer.chopra@med.usc.edu

Date: August 20, 2016

Re: 333 South La Cienega Project Letter of Support

To Whom It May Concern:

My name is Dr. Sameer Chopra, and my family and I are current homeowners at Westbury Terrace, a condominium building located at 321 S. San Vicente. This street is directly across the street, specifically directly west from the 333 S. La Cienega Blvd property, and location of the planned 333 South La Cienega Project.

Previously, I submitted a letter that opposed the 333 South La Cienega Project. After doing much due diligence, additional research, analysis and discussions, I would like to withdraw my previous letter and would like to provide mine and my family's full support of the project, 333 South La Cienega, proposed by Caruso Affiliated in its entirety.

My family and I all are tired of looking out of our balcony every night seeing homeless people camped out sleeping on 333 South La Cienega. I believe the project outlined by Caruso Affiliated in its entirety would both beautify our neighboring streets and subsequently increase the value of our current condominium.

I am aware of the concerns some may have about the potential additional traffic associated with such a development. However, currently 333 South La Cienega is a public parking garage and the proposed project provides only parking for residence and guests. I cannot stress how much reduced traffic this proposed project in its entirety would actually provide on the weekends. Parking spots that were previously public where anyone could park at are now reserved only for residence of 333 South La Cienega, thus in my opinion reducing those who come to the Beverly Center and 3rd street to shop!

40-1

Once again, as a resident that resides directly adjacent to 333 South La Cienega, I give my full support to the project as proposed by Caruso Affiliated in its entirety.

If there are any questions or concerns, please do not hesitate to contact me and/or my family at the above contact information.

Sincerely,

Sameer Chopra, MD

Preeti Chopra, MD

Jatinder Chopra, MD

Parveen Chopra

Comment Letter 41

8/21/2016

To: Whom it May Concern:

My name is Susan Hanasab. I am a homeowner at Westbury Terrace, which is directly across from 333 La Cienega project. Originally I was concerned as to how the project would affect the sunlight, brightness, views, etc. of the unit. I was also concerned about the noise and dust during the construction time.

There were other homeowners with similar concerns on the East side, as a result, a group was formed which was headed by Dr. Alex Foxman, Mrs. Yehudit Bernstein and Mr. Michael Eshmoili, who are homeowners on the East side, in order to find solutions to these concerns. Originally I had written letters to voice my concerns.

Recently the above 3 homeowners have been in close communication with Mr. Caruso's office and himself to find some solutions for the people living on the East side. We were told that there has been several meetings, considerations, and discussions. We were advised by Mr. Alex Foxman, the head of the group, that Mr. Caruso personally had given his word to address the homeowner's concerns fully. I was told that details had been discussed to cover different areas of concern and Mr. Caruso had said that he would re-mediate the adverse consequences.Also it appears that the majority of the homeowners at Westbury Terrace who have been involved in this process are for the project.

41-1

Due to all the above factors, I am withdrawing my letters of concern and am for the project as proposed.

Thank you.

Susan Hanasab

Comment Letter 42

Dear Alejandro, Paul, Shawn and Administration Mid City West,

I support the 333 S. La Cienega project. It will be nice to have a market again (when I bought my condo here there were 2 markets across the street from me, then Cedar Sinai stole the property where the market was) plus nice to have a restaurant across the street from us.

Mr. Caruso has promised us that he will see that we don't have any of his employees parking on San Vicente to take up our parking places; keep the dust pollution and noise pollution down by having his employees and construction come and go on the La Cienega side of the building and park inside the building.

The building that he is building will be a great improvement visually over the present structure.

He also has promised to repair and maintain the payment of the street both on San Vicente and La Cienega; keep it visually beautiful with trees and flowers.

42-1

Sincerely,

Nina Diamante, 321 S. San Vicente Blvd., #402, Los Angeles, CA 90048 310 275-6106

Comment Letter 43

Hello,

My name is Janet Wei, and I am homeowner at Westbury Terrace located at 321 S. San Vicente directly across the street from the 333 S. La Cienega Blvd property.

I had initially submitted a letter against the proposed project, but after further evaluation, analysis and discussions with both other owners in our building and CRM/Caruso, it became very clear that this project will benefit our community and my property value.

Therefore, as a resident that resides closest to the 333 S. La Cienega, I would like to give my full support to the project as proposed by CRM/Caruso in its entirety.

43-1

Sincerely,
Janet Wei

Dear Alejandro,

I am writing you today to express my support and withdraw my opposition letters, dated June 28 and July 4, 2016, regarding the proposed 333 La Cienega project.

After numerous meetings with Caruso Affiliated all my negative concerns were addressed and solutions were offered to all the residents affected at 321 S San Vicente, where I own my condo. Now I believe this project will have a positive effect in our community. Therefore, I fully support a 20 story building being built at 333 La Cienega by Caruso Affiliated/CRM.

It is my understanding from attending the last Mid-City West council meeting that certain members of the council believe they are doing the community a favor by reducing the building to 10 stories, but I would like to stress the fact that they would in fact be harming those most affected by the construction of the building. I live on the east side of the only residential building directly facing the proposed 333 La Cienega project and would like the council to know that my "sudden change of heart" comes from the fact that a 20 story building will allow me to retain some of my view as well as having a nice community space on the ground floor, whereas a 10 story building will block most of my view (because Caruso Affiliated has mentioned that the shorter the building is, the wider they must build in order to make up for the loss of space) and have no community space on the ground floor. So simply, I would rather to have a thinner and taller building, than shorter and wider.

I agree with whomever said that we are having a "renaissance" in this area and believe that the proposed 333 La Cienega project will be a large positive contribution to that renaissance.

Also, I would like to mention that I presented the city with over 50 signed petitions against the building, but they are now supporting this project in its entirety.

Please reflect this in the final EIR report.

Thank you

Michael Eshmoili

44-1

Comment Letter 45

Eva Hernandez
321 S San Vicente Blvd apt 406
Los Angeles, CA 90048

August 22, 2016

To whom it may concern:

I while ago I wrote expressing my concern on the Caruso Project on 333 La Cienega Blvd. I have been thinking about this project and I think it would actually increase the property value of our homes.

I want to retract from what I wrote back in June. The gardens they are proposing outside the building will give a nice touch to a part of the city which is only pavement and buildings. It is always beautiful to see green around the place one lives in. The new building being modern and pretty will be worth seeing and now with the renovated Beverly Center, our apartment building will be surrounded with pretty buildings.

45-1

The restaurants and stores that the building will have will bring new life to our neighborhood. And with it, jobs will be generated improving LA's economy. The fact that the building would be 20 stories high will make our zone much more cosmopolitan and interesting.

Therefore, after giving it thought, I realized that this project is a great idea for the neighborhood.

Sincerely,

Eva Hernandez

Comment Letter 46

Good Afternoon,

I have been a nearby neighbor to the proposed project at 333 S. La Cienega for several years. I am writing to express my strong support for upcoming Caruso project which will aid in transforming the overlooked corridor currently occupied by the vacant Loehmann's building. I have seen the project renderings which clearly illustrate how this project will create open space, pedestrian safety and bike lane improvements.

As a resident of Los Angeles for over five years, it has been obvious the lack of housing offered in the area. 333 La Cienega will be able to offer relief, especially based on the difference 8500 Burton Way has made in the community. Los Angeles will continue to grow, and this growth requires an increase in housing density and retail projects along our major corridors – especially ones that promote walkability and are located along public transit routes. 46-1

I personally encourage The City to ensure that the developer supports making the crosswalks safer across La Cienega, San Vicente and Burton Way. This is the time to make sure that project also improves safety for everyone who wants to walk or bike through the neighborhood.

Please support this project, and in turn, the local residents and businesses.

Thank you for your time and consideration.

Sincerely,

Rachel Podor

120 South Sweetzer

Los Angeles, CA 90048

Comment Letter 47

Good afternoon,

I have lived in the neighborhood surrounding the proposed project at 333 S. La Cienega Blvd for over 10 years. I am writing to express my full support of this project. This development will undoubtedly transform what is currently an eyesore into a world class and beautiful area for all of us to enjoy. I have operated restaurants in the immediate area for 8+ years and believe this beautification will have a net positive effect on businesses of all stripes shapes and sizes. 47-1

In addition to having a business interest in the area my wife and I are avid walkers for exercise sake, I believe this project will upon completion transform this area which we have previously avoided at all costs, into an attractive destination thru which we can stroll and relax, enjoying the sites and sounds.

Please approve this project!

Sincerely,

Michael A. Kelly
344 S. Detroit Street

previously of
816 Westmount Drive

Comment Letter 48

Hello, My name is Melissa Kelly and I am writing in support of the proposed project at 333 La Cienega.

I've been in the neighborhood over 5 years and have frequently remarked what an eye sore its current incarnation is. I've seen Caruso's proposed plans and find them to be exactly what this stretch needs, if the beautiful 8500 is any indication, this is a no brainer. 48-1

PLEASE support this great project!

Sincerely,
Melissa Kelly
344 S Detroit Street
LA, CA 90036

Alejandro Huerta

Los Angeles Department of City Planning

Dear Mr Huerta,

I am writing to you (as well as some of your colleagues) in support of the proposed Caruso development at 333 La Cienega. I am a mid-city local, I live walking distance from The Grove and the commute to my office in Century City takes me through that intersection of San Vicente and La Cienega every morning. I know this area, I know what it needs and I believe the Caruso organization does too. My wife and I moved back to the mid-city area about 13 years ago, just after The Grove opened. One of the things that drew us back here was the way the neighborhood was reinventing itself, becoming more vital, a place where you wanted to walk to things again. It's what's kept us here for thirteen years and it's where we see our future. I believe this, in no small part, is due to what Caruso has done for the neighborhood and the strong community consciousness of his organization. It's an ongoing commitment that I have seen close up. There are many fine developers out there however most build and leave, Caruso stays. That's the difference. 49-1

I think the property at 8500 Burton Way was a great start. I have walked to The Larder for breakfast on several occasions (and the fact that I'm willing to walk from Burnside should tell you something about the power of a good destination). It would be great to have its match on the other side of the street.

I will try to be at the next meeting discussing this (I'm not sure when it is) but regardless I hope you will support this initiative. I think it will benefit the area greatly. Thank you for your time.

Best Regards,

Nicholas Bunin

430 S. Burnside Ave Los

Angeles, CA 90036

My name is Yhudit Bernstein.
I own and reside in unit 1103 at Westbury Terrace 321 S. San Vicente Blvd L.A. 90048
I support the planned development.
I have been convinced that the luxurious and attractive nature of the new project will increase the safety of the neighborhood and add value to my property.

50-1

Sincerely
Yhudit Bernstein

Good Morning,

My name is Ben Gold and I am a resident in the Mid-City area, and work every day in the immediate vicinity of Caruso's proposed project at 333 La Cienega. I strongly urge you to support this project because I firmly believe it will enhance the area--Caruso's projects have helped spur rejuvenation in their respective neighborhoods time and again.

I am particularly excited to see the aesthetic and safety improvements that Caruso has promised as part of the project. I am often a driver and a pedestrian in the area, and it will be amazing to actually feel safe on a sidewalk and at intersections that I currently avoid almost entirely. 333 La Cienega will also be one more great destination for everyone to walk to and enjoy the new park and retail when I'm out and about. 51-1

This article, 50 Reasons Why Everyone Should Want More Walkable Streets, that recently appeared in Fast Company, confirms why I think we all ought to be anxious for more projects such as this one:

https://www.fastcoexist.com/3062989/50-reasons-why-everyone-should-want-more-walkable-streets

For these and many other reasons, I urge you to support this project.

Sincerely,

Ben Gold
3701 Overland Ave.
Los Angeles, CA 90034

Comment Letter 52

From: **Ramzi Essaid** <ramzi.essaid@gmail.com>
Date: Tue, Aug 30, 2016 at 11:53 AM
Subject: 333 S. La Cienega
To: alejandro.Huerta@lacity.org
Cc: paul.koretz@lacity.org, shawn.bayliss@lacity.org, admin@midcitywest.org, msigal@midcitywest.org, sepstein@midcitywest.org

Hello,
I'm writing to urge you to approve Caruso's proposed project at 333 La Cienega. I've called Los Angeles and West Hollywood home for over twelve years and I believe this area would benefit greatly from the proposed project and surrounding improvements.

As a dog lover, I would like to add this area to my walking repertoire. Currently this stretch is one to be avoided, I believe, if Caruso's 8500 Burton Way is any indication, 333 will become a great LA destination. Please approve!

52-1

Sincerely,
Ramzi Es-Said
1137 N. Vista St.
West Hollywood, CA 90046

Jaber Original Holdings, LLC

848 N. La Cienega Blvd, Suite 207 Los Angeles, CA 90069
Tel: (310) 657-0700 Fax: (310) 657-7136 Email: dbtdesk@gmail.com

August 30, 2016

Alejandro A. Huerta
Major Projects & Environmental Analysis
Department of City Planning
City Hall, City of Los Angeles
200 North Spring Street, Room 750
Los Angeles, CA 90012
Email: Alejandro.Huerta@lacity.org; Paul.koretz@lacity.org; Shawn.bayliss@lacity.org
admin@midcitywest.org; msigal@midcitywest.org; sepstein@midcitywest.org

Re: Case Number: CPC-2015-896-GPA-VZC-HD-MCUP-ZV-DB-SPR;
VTT-74131
CEQA Number: ENV-2015-897-EIR (Sch No: 201611061)
Project Name: 333 S. La Cienega Boulevard

Mr Huerta, et al;

We are the owners of parcel 4334-009-158, consisting of 3 lots (301 S. La Cienega Blvd), located immediately abutting the northerly property line of the proposed project at 333 S. La Cienega Blvd, Los Angeles, California 90048. In addition to the ownership of our parcel abutting the proposed project, we additionally own several additional lots along North La Cienega Boulevard demonstrating our vested interest in La Cienega and the neighborhood.

We have reviewed the project of applicant CRM as submitted and hereby wish to restate our support of the project as submitted. We feel the project is a good one, and one that will enhance the local community and businesses.

53-1

Very truly yours,

David B Tohl
Jaber Original Holdings, LLC
848 N La Cienega Blvd, Suite 207
Los Angeles, CA 90069

To whom it may concern,

My name is Roya Shahnazari and I am a resident of Los Angeles, near the proposed site of 333 La Cienega. Growing up in the area, I have seen Caruso Affiliated create landmark developments which have improved cities and surrounding areas, which are both aesthetically and quantifiably evident. I have recently become aware that some people are not in favor of this project, which I am unable to wrap my mind around. Caruso is a trusted company and brand, they have proven over decades that they are not only capable of a project of this magnitude, but their delivery is always above and beyond the expectations.

I have been a consumer for many years at Marina Waterside, The Grove, The Americana at Brand, and the retail attached to 8500 Burton Way. The level of customer service and genuine satisfaction provided to people on Caruso properties never ceases to amaze me. I know that 333 La Cienega will be no exception; we can expect a beautiful new building that will be created with the utmost care and quality, and will be an asset to the community and its residents.

54-1

The fact of the matter is, this is Los Angeles. There will always be developments and construction occurring. This is not a small, quiet farm town where we can reject increased housing and retail development. Given this fact, I would like to put my trust into a company that has proven its versatility, dedication, and success to our community. Their involvement with the citizens and constant outreach to help answer questions proves that they are honest and care about what people have to say. The same cannot be said for most developers in Los Angeles, or elsewhere for that matter. Approving this project means that we are getting the personalization of a small company, with the track record of a successful and lucrative company.

Thank you for your time.

All the best,
Roya Shahnazari