DEPARTMENT OF CITY PLANNING

RECOMMENDATION REPORT

City Planning Commission

Date: July 14, 2022
Time: After 8:30 a.m.*
Place: In conformance with the Governor's Executive Order N-29-20 (March 17, 2020) and due to concerns over COVID-19, the CPC meeting will be conducted entirely telephonically by Zoom [https://zoom.us/].

The meeting's telephone number and access code access number will be provided no later than 72 hours before the meeting on the meeting agenda published at https://planning.lacity.org/about/commissionsboards-hearings and/or by contacting cpc@lacity.org

Case No.: DIR-2018-6634-TOC-A1
CEQA No.: ENV-2018-6635-CE

Council No.: 1-Cedillo
Plan Area: Silver Lake-Echo Park-Elysian Valley
Specific Plan: N/A
Certified NC: Echo Park

Land Use: General Commercial
Zone: C2-1VL

Applicant: Aym Investment, LLC
Representative: Andy Simhaee, Simha Engineering, Inc.
Appellant: Richard Courtney

Public Hearing: N/A
Appeal Status: Not Further Appealable
Expiration Date: July 14, 2022
Multiple Approval: No

PROJECT LOCATION: **1251-1259 West Sunset Boulevard**

PROPOSED PROJECT: The proposed project is the construction, use, and maintenance of a new, seven-story, 70-unit residential development with seven (7) affordable units (six (6) units or 8% of the total number of dwelling units set aside for Extremely Low-Income Households pursuant to Transit Oriented Communities Affordable Housing Incentive Program, and one (1) additional unit in compliance with Los Angeles Housing Department's Replacement Unit Determination, dated October 25, 2018). The proposed development consists of two (2) buildings with a total of 55,000 square feet of floor area, resulting in a Floor Area Ratio (FAR) of 2.75 to 1, and will provide 38 parking spaces.

APPEAL: An appeal of the Director of Planning's approval of a Transit Oriented Communities Affordable Housing Incentive Program for the construction, use, and maintenance of a new, seven-story, 70-unit residential development with seven (7) affordable units (six (6) units or 8% of the total number of dwelling units set aside for Extremely Low-Income Households pursuant to Transit Oriented Communities Affordable Housing Incentive Program, and one (1) additional unit in compliance with Los Angeles Housing Department's Replacement Unit Determination, dated October 25, 2018).

RECOMMENDED ACTIONS:

1. **Deny** the appeal;

2. **Determine** that, based on the whole of the administrative record, the project is exempt from the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines, Article 19, Section 15332, Class 32 (In-Fill Development Projects) and there is no substantial evidence demonstrating that any exceptions contained in Section 15300.2 of the State CEQA Guidelines regarding location, cumulative impacts, significant effects or unusual circumstances, scenic highways, or hazardous waste sites, or historical resources applies;

3. **Sustain** the Director of Planning approval for a 50% increase in density consistent with the provisions of the Transit Oriented Communities Affordable Housing Incentive Program along with the three (3) base incentives and the following three (3) additional (3) incentives for a Tier 1 project totaling 70 dwelling units, reserving six (6) units for Extremely Low Income (ELI) Household occupancy (and one (1) additional unit in compliance with Los Angeles Housing Department's Replacement Unit Determination, dated October 25, 2018) for a period of 55 years:

   a. Side Yards. A 25% reduction in the required side yards;

   b. Rear Yard. A 25% reduction in the required rear yard;

   c. Height. A height increase of one (1) additional story up to 11 additional feet; and

4. **Adopt** the findings therein.

VINCENT P. BERTONI, AICP
Director of Planning

Heather Bleemers
Senior City Planner

Oliver Netburn
City Planner

Stephanie Escobar

Stephanie Escobar, Stephanie.Escobar@lacity.org
Planning Assistant

ADVICE TO PUBLIC: * The exact time this report will be considered during the meeting is uncertain since there may be several other items on the agenda. Written communications may be mailed to the *Commission Secretariat, Room 272 City Hall, 200 North Spring Street, Los Angeles, CA 90012 (Phone No. 213-978-1300).* While all written communications are given to the Commission for consideration, the initial packets are sent to the Commission's Office a week prior to the Commission's meeting date. If you challenge these agenda items in court, you may be limited to raising only those issues you or someone else raised at the public hearing agendized herein, or in written correspondence on these matters delivered to the agency at or prior to the public hearing. As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate. The meeting facility and its parking are wheelchair accessible. Sign language interpreters, assistive listening devices, or other auxiliary aids and/or other services may be provided upon request. To ensure availability of services, please make your request at least seven (7) days prior to the meeting by calling the City Planning Commission Office at (213) 978-1300.

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PROJECT ANALYSIS

PROJECT SUMMARY

The proposed project is the construction, use, and maintenance of a new, seven-story, 70-unit residential development with seven (7) affordable units (six (6) units or 8% of the total number of dwelling units set aside for Extremely Low-Income Households pursuant to Transit Oriented Communities Affordable Housing Incentive Program, and one (1) additional unit in compliance with Los Angeles Housing Department's Replacement Unit Determination, dated October 25, 2018). The project proposes a total of 38 parking spaces, 70 long-term bicycle spaces and seven (7) short-term bicycle spaces. The unit mix will be comprised of 27 studios and 43 one-bedroom units. A total of 7,025 square feet of open space will be provided throughout the proposed project. The project will maintain a 0-foot front yard, a 10-foot northern side yard, a 7-foot 6-inch southern side yard, and a 15-foot rear yard.

The proposed development consists of two (2) buildings (Building A and Building B). In total, the proposed development will encompass a total of 55,000 square feet of floor area resulting in a Floor Area Ratio (FAR) of 2.75 to 1. Building A is located on the eastern portion of the lot with a frontage along Sunset Boulevard and consists of five (5) residential levels over two (2) levels of parking (one (1) at-grade and one (1) above grade) with a maximum height of 68 feet. Building B will be constructed with six (6) residential levels over one (1) level of at-grade parking with a maximum height of 68. The project also includes the export of approximately 18,200 cubic yards of earth.

The proposed project, which is located within a Tier 1 TOC Affordable Housing Incentive Area and sets aside 8% of the total number of units for Extremely Low Income Households, meets all eligibility requirements for the TOC Affordable Housing Incentive Program and is entitled to the Base Incentives. In addition, the subject property is located within a Tier 1 TOC Affordable Housing Incentive Area due to its proximity within 2,640 feet of a Major Transit Stop, the intersection of Temple Street and Edgeware Road, which includes the intersection of two (2) or more bus routes with a service interval of 15 minutes or less during the morning and afternoon peak commute periods (the DASH – Pico Union & Echo Park and Local Bus 10).

Given the above, the proposed project is eligible for and includes the following Base and Additional Incentives for a qualifying Tier 1 Project:

Tier 1 Base Incentives:

a. **Density:** The subject property is zoned C2-1VL and limited to a maximum density of one (1) dwelling unit per 400 square feet of lot area. With a lot area totaling 20,000 square feet, the project is permitted to construct up to 50 dwelling units by-right. As an eligible Housing Development, the project is entitled for a 50 percent density increase for a maximum of 75 total units. In this case, the project seeks a 40 percent density increase to permit a total of 70 units.

b. **Floor Area Ratio (FAR):** The subject property is zoned C2-1VL and limited to an FAR of 1.5 to 1. With a lot area of 20,000 square feet and a FAR limitation of 1.5 to 1, the property has a maximum permitted floor area 30,000 square feet by-right. As an eligible Housing Development, the project is permitted a FAR of 2.75 to 1 in a commercial zone. The property is eligible for a FAR of 2.75 to 1 allowing up to 55,000 square feet of floor area for the property zoned C2-1VL. With the FAR Base Incentive, the project will construct a 53,049 square-foot building at a FAR of 2.54 to 1 (C2-1VL).

c. **Parking:** Pursuant to LAMC Section 12.21-A,4, the proposed 70-unit residential building would be required to provide a total of 90 residential parking spaces. However, an Eligible Housing Development pursuant to the TOC Guidelines requires residential parking at a ratio of 0.5 spaces per bedroom for Tier 1 projects. With the utilization of the parking reduction, the project will provide a total of 38 residential parking spaces.

Tier 1 Additional Incentives:

Pursuant to the Transit Oriented Communities Affordable Housing Incentive Program Guidelines (TOC Guidelines), the Tier 1 Project is eligible for and has been granted three (3) Additional Incentives in order to construct the proposed project:

a. **Rear Yard.** A 25% reduction in the required rear yard to allow 15 feet in lieu of the minimum 19 feet required for a seven-story housing development in the C2-1VL Zone.

b. **Side Yard.** A 25% reduction in the required southern side yard to allow seven (7) feet and six (6) inches in lieu of the minimum 10 feet required for a seven-story housing development in the C2-1VL Zone.

c. **Height.** A height increase of one (1) additional story up to 11 additional feet. The project is 68 feet in height, 11 feet above the allowable 57 feet maximum height.

PROJECT BACKGROUND

Project Site

The subject property is a sloping, rectangular, 20,000 square-foot (0.46 acre) lot comprised of two (2) lots with a frontage of approximately 100 feet along the eastern side of Sunset Boulevard and a depth of 200 feet. The property is currently improved with 10 residential units totaling 5,280 square feet.

General Plan Land Use Designation and Zoning

The project site is located within the Silver Lake-Echo Park-Elysian Valley, which designates the site for General Commercial land uses with corresponding zones of C1.5, C2, CR, C4, and RAS3 The subject property is zoned C2-1VL.

The project site is located within the Tier 1 TOC Affordable Housing Incentive Area, a Hillside Area, a Transit Priority Area, and 0.19 km from the Upper Elysian Park Fault. The project site is not located within the boundaries of, or subject to any specific plan, community design overlay, or interim control ordinance.

Surrounding Properties

Surrounding properties are generally developed with single-family and multi-family residential developments and commercial uses. Properties to the north abutting the subject property are zoned C2-1VL and are improved with a single-story restaurant and associate parking. Properties to the east abutting the subject property are zoned [Q]R3-1VL and are improved with a single-family home and an apartment building. Properties to the south abutting the subject property are zoned C2-1VL and are improved with a boarding house and vacant one-story commercial

buildings. Properties to the west, across Sunset Boulevard, are zoned C2-1VL and are improved with a one-story commercial building and a Taoist temple.

APPEAL ANALYSIS

On August 21, 2021, the Director of Planning approved a request for a Transit Oriented Communities Affordable Housing Incentive Program for the construction, use, and maintenance of a new, seven-story, 70-unit residential development with six (6) units (8% of the total number of dwelling units) set aside for Extremely Low Income Households in compliance with TOC Guidelines and one (1) additional affordable unit in conformance with the Los Angeles Housing Department (LAHD) for a total of seven (7) affordable units. The project proposes a total of 38 parking spaces, 70 long-term bicycle spaces and seven (7) short-term bicycle spaces.

On September 10, 2021, an appeal was filed by Richard Courtney for the entire decision of the Director of Planning. Subsequently, the appeal (Case No. DIR-2018-6634-TOC-A1) was scheduled for public hearing on April 14, 2022, where the City Planning Commission motioned to continue the appeal for the public hearing held on July 14, 2022.

The following statements have been compiled from the submitted appeal. The appeal in its entirety have been attached herein for reference (Exhibit A).

Appeal Point 1:

The project does not comply with Los Angeles Municipal Code (LAMC) Section 12.22(a)(25). The appellant claims that the project reduces and removes existing low income housing, against city policies as stated in LAMC Section 12.22(a)(25).

Staff Response:

The designee of the Director of Planning was able to rely upon the TOC referral form in order to make the necessary findings to approve the proposed TOC project, consistent with LAMC Section 12.22(a)(25).

As such, while the project is required to set aside only six (6) units for Extremely Low Income Households in conformance with the TOC Guidelines, the project is required to reserve a total of seven (7) as affordable in conformance with Los Angeles Department of Housing (LAHD) housing replacement requirements.

The subject site consists of a total of 10 units, of which were previously low-income rental units. Seven (7) of those ten low income rental units have been vacant for approximately two (2) years, due to eviction acted under the Ellis Act.

On October 25, 2018, the Los Angeles Housing Department (LAHD), formerly the Los Angeles Housing and Community Investment Department, issued a Determination for the subject project site. As stated by LAHD, the site consists of 10 (RSO) units of which no income documents were provided to LAHD. In compliance with AB 2556, LAHD determined that seven (7) units need to be replaced with equivalent type including, four (4) units restricted to Extremely Low Income Households, two (2) units restricted to Very Low Income Households, and one (1) unit restricted to Low Income Households. In order to comply with the LAHD analysis, the applicant is proposing to set aside six (6) units as affordable to Extremely Low Income households and one (1) unit as affordable to Low Income Households.

The project is located in a Tier 1 Transit Oriented Communities which requires at least 8% of the total number of dwelling units to be affordable to Extremely Low Income (ELI) income households. As such, the project proposes to set aside 8% of the total 70 dwelling units, which equates to six (6), for Extremely Low Income households.

Additionally, as conditioned in the Letter of the Determination, the project shall comply with Condition No. 8 which states the following: "**Housing Replacement.** Prior to issuance of a building permit, the owner shall execute a covenant to the satisfaction of HCIDLA to replace a total of seven (7) dwelling units including: four (4) units restricted to Extremely Low Income Households; two (2) units restricted for Very Income Households, and one (1) unit restricted to Low Income Households, for sale or rental as determined to be affordable to such households by HCIDLA for a period of 55 years. Enforcement of the terms of said covenant shall be the responsibility of HCIDLA. The applicant will present a copy of the recorded covenant to the Department of City Planning for inclusion in this file. The project shall comply with the Guidelines for the Affordable Housing Incentives Program adopted by the City Planning Commission and with any monitoring requirements established by the HCIDLA. Refer to the Density Bonus Legislation Background section of this determination. On-site Restricted Affordable Units may be used to satisfy the housing replacement units required pursuant to AB 2556 provided such units meet the income levels, to the satisfaction of HCIDLA."

Therefore, the project is conditioned to provide the required affordable housing units to the satisfaction of HCIDLA and the project is consistent with the TOC Guidelines and the LAMC.

Appeal Point 2:

The appellant claims the Letter of Determination (LOD) is inconsistent due to the following:

a. The LOD on page 1, claims: "six (6) units are reserved for Extremely Low Income (ELI) Household occupancy (page 1 of LOD)".

b. The LOD on page 3 claims to replace "a total of seven (7) dwelling units including: four (4) units restricted to Extremely Low Income Households; two (2) units restricted for Very Income Households, and one (1) unit restricted to low Income Households, for sale or rental as determined to be affordable to such households."

c. "Very Income" households is not quantifiable. The DCP erred in granting approvals to a project with no clear and specific knowledge of what type of units are intended to be built. This is in contradiction with itself and omits material information including details related to the Area Median Income (AMI) assigned to the evasive "affordable" units.

d. The applicant's Environmental Assessment Form ("EAF") states: "8% (6 Units) will be set aside for extremely [sic] low income."

e. The DCP's application submitted by the applicant states: "Setting aside 9% (6 unit s) for Very low income." It further states it will add: "40 Residential Units, 6 Affordable Units, 64 Market Rate Units." Below that, it states: "Tier 1- TOC, FAR and Height, for construction, use and maintenance of a 70 Unit apartment building with a total of 55,000 Sq. Ft., Setting aside 8% (6 units) for Very low income." Even with its conflicting numbers and omissions, it is this application the DCP has relied on to approve this project as a TOC, for which it does not qualify. Furthermore, the DCP has assigned a Tier of

incentives to this project without knowing what type or how many “affordable” units it alleges to build.

Staff Response:

As stated in the above staff response, the project is located in a Tier 1 Transit Oriented Communities which requires at least 8 percent of the total number of dwelling units to be affordable to Extremely Low Income (ELI) income households. As such, the project is proposing to set aside 8 percent of the total 70 dwelling units which equates to six (6) Extremely Low Income Units, consistent with the TOC regulations.

Nevertheless, as required per LAHD’s October 25, 2018 Replacement Unit Determination, seven (7) units need to be replaced with equivalent type including, four (4) units restricted to Extremely Low Income Households, two (2) units restricted to Very Low Income Households, and one (1) unit restricted to Low Income Households.

As such, while the project is required to set aside only six (6) units for Extremely Low Income Households in conformance with the TOC Guidelines, the project is required to reserve a total of seven (7) as affordable.

The text error found in the Letter of Determination as referenced in point (c) above is an error. The Letter of Determination is clear in various other sections that the project will be allocating six (6) units for Extremely Low Income households. Furthermore, staff recommends that the City Planning Commission recommend the following correction to the Letter of Determination:

Condition No.8 (proposed text is underlined):

Housing Replacement. Prior to issuance of a building permit, the owner shall execute a covenant to the satisfaction of HCIDLA to replace a total of seven (7) dwelling units including: four (4) units restricted to Extremely Low Income Households; two (2) units restricted for Very <u>Low</u> Income Households, and one (1) unit restricted to Low Income Households, for sale or rental as determined to be affordable to such households by HCIDLA for a period of 55 years. Enforcement of the terms of said covenant shall be the responsibility of HCIDLA. The applicant will present a copy of the recorded covenant to the Department of City Planning for inclusion in this file. The project shall comply with the Guidelines for the Affordable Housing Incentives Program adopted by the City Planning Commission and with any monitoring requirements established by the HCIDLA. Refer to the Density Bonus Legislation Background section of this determination.

Appeal Point 3:

The appellant claims that the project is incorrectly exempt from the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines, Section 15332, Article 9 (Class 32). Specifically, the appellant has made the following claims:

a) That the project is not consistent with the applicable General Plan and Zoning.
b) That the project has value as a habitat for endangered, rare, or threatened species.
c) That the project results in significant impacts relating to traffic, noise, air quality, or water quality.

Staff Response:

The appellant claims that the project is inconsistent with the applicable general plan and zoning regulations but did not provide any evidence as to why the project is inconsistent with the General Plan goals and policies and the applicable zoning regulations. Furthermore, the lead agency approved the project with discretionary review of the applicable General Plan and Zoning regulations.

The appellant also claims that the project has value as a habitat for endangered, rare, or threatened species but fails to provide a species that is endangered, rare, or threatened at the subject site. The appellant also references a 20-year-old academic paper that discusses the impact of the human footprint in the natural environment. Contrarily, the project is a Transit Oriented Communities (TOC) project which encourages the use of public transit as a means of transportation and is located within an already dense and urbanized neighborhood in the city of Los Angeles.

In order to qualify for the Class 32 (Infill) Categorical Exemption, a project must demonstrate that it would have a less than significant impact on the environment, in addition to meeting a number of specific criteria. In this case, the city relied on multiple technical studies to assess the project's eligibility for a Categorical Exemption. These technical studies include a Noise Study, Air Quality Study, Traffic Study, and Soils Report, all of which found the project would have a less than significant impact on the environment. All of the technical studies conducted on the subject site found that the project would have a less than significant impact on the environment.

Furthermore, the appellant specifically claims that the project has significant air quality impacts due to a present Methane Zone. LADBS will ensure compliance with those standards. For instance Condition No. 32 of the LADBS Soils approval letter notes that project's design is governed as a Site Class C. Similarly, due to the project's location within a Methane Zone, all building code standards such as those pertaining to seismic and methane hazards safety, are enforced. Issues concerning site preparation and design are governed by objective requirements in the building code. The Department of Building and Safety (LADBS), Grading Division, reviewed the project's Soils report and approved the findings including the imposition of regulatory compliance measures to ensure the project's seismic stability. Therefore, no substantial evidence has been provided to show that the Class 32 Categorical Exemption does not apply to the subject property.

Appeal Point 4:

The appellant has considered the subsurface and geological studies conducted for a proposed project located at 1185-1247 ½ West Sunset Boulevard and 917 North Everett Street, approximately 60 feet from the subject site. These studies found that the site located at 1185-1247 ½ West Sunset Boulevard and 917 North Everett Street would be a concern to public safety due to seismic instability and therefore, the project was not finalized.

Additionally, the appellant has also considered evidence of seismic instability stemming from the Lamar and/or Earth Consultants fault lines and according to the appellant's Exhibit B, this fault line resulted in the demolition of two new buildings in December 2004 at the Roybal Belmont High School location due to potential seismic danger.

The appellant claims that the studies conducted for the site located approximately 60 feet from the subject project, the Roybal Belmont High School demolition, and the geology and soils report for the subject site should trigger a full environmental review for the current proposal.

Staff Response:

The appellant has submitted numerous studies for a previously proposed project on, but different, property in which environmental concerns were found during the initial environments assessment of a different project. The additional reference of Roybal Belmont High School as a relevant neighboring property is not substantial evidence as the school is located approximately 0.8 miles from the subject site.

The information provided by the appellant is specific to other properties and another project. The appellant has not provided any substantial evidence pertaining to the subject property or proposed project.

Nevertheless, several of the concerns presented by the appellant involved seismic and methane safety. As discussed above, these areas are addressed through the building code requirements and LADBS's regular permitting process; and in the case of geologic and seismic safety, a soils report was reviewed and approved by the LADBS, Grading Division and on October 24, 2017, the Grading Division issued a Geology and Soils Approval Letter for the proposed project.

As such, the evidence provided by the appellant is not applicable to the subject property, nor the proposed project.

Appeal Point 5:

The appellant has included an opinion letter dated September 8, 2021 authored by a geologist for the subject site. The report recommended consideration of technical issues including absence of Methane Zone hazard study, potential fault line locations/activity levels and bedrock slope stability due to slope angles, the dip angles of existing bedrock bedding, assumed material strengths, presence of fractures, up slope groundwater/seepage, and orientation/height if the proposed permanent and temporary slopes. The opinion letter also claimed that the proposed project did not conduct geotechnical investigation on the subject site.

Staff Response:

The applicant submitted a response report to the CEQA claims dated March 22, 2022 authored by the original Geologists that had previously studied the subject site. As part of the response letter, the geologists conducted a site visit to investigate the current surface conditions. The geologist found that the conditions of the subject site are the same as previously analyzed and no stability issues were encountered as otherwise claimed by the appellant.

The appellant's opinion letter claims that no methane hazard study was conducted for the subject site. Contrarily, a methane test investigation was prepared and dated March 31, 2017 where no significant impacts were found.

Additionally, the subject site is not located within an Alquist-Priolo zone, therefore does not require a fault study. The state of California does not consider the mapped fault lines in the surrounding area as active, therefore fault studies are not required for development projects in the area. As such, a fault study was not preformed.

Regarding the claims about groundwater seepage, the geotechnical investigation conducted a groundwater investigation by utilizing eight (8) holes which did not find any groundwater. Additionally, the basement walls of the proposed project will be water proofed.

The opinion letter claims that a geotechnical investigation was not prepared for the subject property, which is false. A geotechnical report dated April 4, 2017 was prepared for the subject site and approved by Building and Safety Grading Division in their October 24, 2017 Soils Approval Letter. Such technical reports have been in the public record since 2017. As such, the applicant has conducted sufficient investigations on the subject property to ensure all compliance measures are met.

Appeal Point 6:

The project will result in the demolition of the Stires Staircase Bungalow Court, which was approved and recommended by the Cultural Heritage Commission on all three criteria of the Cultural heritage Ordinance. The appellant claims that the project will be destroying a historic resource.

Staff Response:

The project was previously put on hold pending the determination of the City Council regarding the historic cultural monument status of Stires Staircase Bungalow Court. On August 18, 2020 the Cultural Heritage Commission submitted a report to the council office recommending inclusion of the Stires Staircase Bungalow Court in the list of Historic-Cultural Monuments. On February 4, 2021, the Planning and Land Use Committee (PLUM) disapproved the Cultural Heritage Commission's recommendation for the City Council to consider the inclusion of the Stires Staircase Bungalow Court and on March 2, 2021 the City Council adopted the PLUM's recommendation forthwith. The action to include the Stires Staircase Bungalow Court as a Historic-Cultural Monument was denied by the City Council on March 2, 2021. As such, the Department of City Planning did not analyze the project site as a historic-cultural monument as the City Council's decision stands as a baseline in the City's CEQA analysis.

Appeal Point 7:

The appellant claims that the TOC application cannot be approved because it is inconsistent with the development standards as laid out in the City Charter. The TOC "Guidelines are subject to the Charter; they do not supplant the Charter. The TOC "Guidelines" recommended by the City Planning Commission were not approved by the City Council, and no application was filed to invoke the mandates of the City Charter.

Staff Response:

Measure JJJ, which was approved by popular vote in 2016, and codified in Los Angeles Municipal Code (LAMC) Section 12.22-A,31, includes a provision that the Director of Planning prepare TOC Affordable Housing Incentive Program Guidelines ("TOC Guidelines") that provide the eligibility standards, incentives, and other necessary components of the TOC Incentive Program. As provided in LAMC Section 12.22-A,31, the TOC Incentives are to include residential density increases, parking reductions and other incentives or concessions found in in California Government Code Section 65915.

On May 25, 2017, the City Planning Commission reviewed and approved the proposed TOC Guidelines which became effective on September 22, 2017. Therefore, the TOC Guidelines are consistent with the provisions set forth in Measure JJJ. All TOC projects are reviewed for compliance with the TOC Guidelines prior to a determination. The proposed TOC project meets the standards and requirements of a TOC development and was therefore approved correctly.

CONCLUSION AND RECOMMENDATION

For the reasons stated herein, the Director of Planning did not error or abuse its discretion in approving DIR-2018-6634-TOC.

The proposed development is consistent with the TOC Guidelines, CEQA Guidelines, the General Plan, the Silver Lake-Elysian Valley-Echo Park Community Plan and the Los Angeles Municipal Code. Therefore, staff recommends that the appeal be denied, and that decision of the Director of Planning be sustained.

APPLICATIONS:

APPEAL APPLICATION

Instructions and Checklist

Related Code Section: Refer to the City Planning case determination to identify the Zone Code section for the entitlement and the appeal procedure.

Purpose: This application is for the appeal of Department of City Planning determinations authorized by the Los Angeles Municipal Code (LAMC).

A. APPELLATE BODY/CASE INFORMATION

1. APPELLATE BODY

☐ Area Planning Commission ☑ City Planning Commission ☐ City Council ☐ Director of Planning
☐ Zoning Administrator

Regarding Case Number: DIR-2018-6634-TOC / ENV-2018-6635-CE

Project Address: 1251-1259 W. Sunset Blvd.

Final Date to Appeal: September 10, 2021

2. APPELLANT

Appellant Identity: (check all that apply)
❒ Representative ☑ Property Owner
❒ Applicant ❒ Operator of the Use/Site

☑ Person, other than the Applicant, Owner or Operator claiming to be aggrieved
Abutting Property Owner: Richard Courtney & ~~The Silver Lake Heritage Trust~~

☐ Person affected by the determination made by the **Department of Building and Safety**

❒ Representative ❒ Owner ❒ Aggrieved Party
❒ Applicant ❒ Operator

3. APPELLANT INFORMATION

Appellant's Name: Richard Courtney

Company/Organization:

Mailing Address: 1001 Everett St.

City: Los Angeles, State: CA Zip: 90026

Telephone: (213) 864-2091 E-mail: richardwcourtney@me.com

a. Is the appeal being filed on your behalf or on behalf of another party, organization or company?

☑ Self ☑ Other: ~~The Silver Lake Heritage Trust~~

b. Is the appeal being filed to support the original applicant's position? ☐ Yes ☑ No

4. REPRESENTATIVE/AGENT INFORMATION

Representative/Agent name (if applicable): _____

Company: _____

Mailing Address: _____

City: _____ State: _____. Zip: _____

Telephone: _____ E-mail: _____

5. JUSTIFICATION/REASON FOR APPEAL

a. Is the entire decision, or only parts of it being appealed? ☑ Entire ☐ Part

b. Are specific conditions of approval being appealed? ☑ Yes ☐ No

If Yes, list the condition number(s) here: conditions 1 - 20

Attach a separate sheet providing your reasons for the appeal. Your reason must state:

- ☑ The reason for the appeal
- ☑ How you are aggrieved by the decision
- ☑ Specifically the points at issue
- ☑ Why you believe the decision-maker erred or abused their discretion

6. APPLICANT'S AFFIDAVIT

I certify that the statements contained in this application are complete and true:

Appellant Signature: _____ Date: Sept 8, 2021

GENERAL APPEAL FILING REQUIREMENTS

B. ***ALL CASES REQUIRE THE FOLLOWING ITEMS - SEE THE ADDITIONAL INSTRUCTIONS FOR SPECIFIC CASE TYPES***

1. Appeal Documents

a. Three (3) sets - The following documents are required for each appeal filed (1 original and 2 duplicates) Each case being appealed is required to provide three (3) sets of the listed documents.

- ☑ Appeal Application (form CP-7769)
- ☑ Justification/Reason for Appeal
- ☑ Copies of Original Determination Letter

b. Electronic Copy

- ☐ Provide an electronic copy of your appeal documents on a flash drive (planning staff will upload materials during filing and return the flash drive to you) or a CD (which will remain in the file). The following items must be saved as individual PDFs and labeled accordingly (e.g. "Appeal Form.pdf", "Justification/Reason Statement.pdf", or "Original Determination Letter.pdf" etc.). No file should exceed 9.8 MB in size.

c. Appeal Fee

- ☐ Original Applicant - A fee equal to 85% of the original application fee, provide a copy of the original application receipt(s) to calculate the fee per LAMC Section 19.01B 1.
- ☑ Aggrieved Party - The fee charged shall be in accordance with the LAMC Section 19.01B 1.

d. Notice Requirement

- ☐ Mailing List - All appeals require noticing per the applicable LAMC section(s). Original Applicants must provide noticing per the LAMC
- ☐ Mailing Fee - The appeal notice mailing fee is paid by the project applicant, payment is made to the City Planning's mailing contractor (BTC), a copy of the receipt must be submitted as proof of payment.

SPECIFIC CASE TYPES - APPEAL FILING INFORMATION

C. DENSITY BONUS / TRANSIT ORIENTED COMMUNITES (TOC)

1. Density Bonus/TOC
Appeal procedures for Density Bonus/TOC per LAMC Section 12.22.A 25 (g) f.

NOTE:
- Density Bonus/TOC cases, only the *on menu or additional incentives* items can be appealed.

- Appeals of Density Bonus/TOC cases can only be filed by adjacent owners or tenants (must have documentation), and always only appealable to the Citywide Planning Commission.

☑ Provide documentation to confirm adjacent owner or tenant status, i.e., a lease agreement, rent receipt, utility bill, property tax bill, ZIMAS, drivers license, bill statement etc.

D. WAIVER OF DEDICATION AND OR IMPROVEMENT

Appeal procedure for Waiver of Dedication or Improvement per LAMC Section 12.37 I.

NOTE:
- Waivers for By-Right Projects, can only be appealed by the owner.

- When a Waiver is on appeal and is part of a master land use application request or subdivider's statement for a project, the applicant may appeal pursuant to the procedures that governs the entitlement.

E. TENTATIVE TRACT/VESTING

1. Tentative Tract/Vesting - Appeal procedure for Tentative Tract / Vesting application per LAMC Section 17.54 A.

NOTE: Appeals to the City Council from a determination on a Tentative Tract (TT or VTT) by the Area or City Planning Commission must be filed within 10 days of the date of the written determination of said Commission.

☐ Provide a copy of the written determination letter from Commission.

F. BUILDING AND SAFETY DETERMINATION

☐ **1.** Appeal of the *Department of Building and Safety* determination, per LAMC 12.26 K 1, an appellant is considered the **Original Applicant** and must provide noticing and pay mailing fees.

a. Appeal Fee
☐ Original Applicant - The fee charged shall be in accordance with LAMC Section 19.01B 2, as stated in the Building and Safety determination letter, plus all surcharges. (the fee specified in Table 4-A, Section 98.0403.2 of the City of Los Angeles Building Code)

b. Notice Requirement
☐ Mailing Fee - The applicant must pay mailing fees to City Planning's mailing contractor (BTC) and submit a copy of receipt as proof of payment.

☐ **2.** Appeal of the *Director of City Planning* determination per LAMC Section 12.26 K 6, an applicant or any other aggrieved person may file an appeal, and is appealable to the Area Planning Commission or Citywide Planning Commission as noted in the determination.

a. Appeal Fee
☐ Original Applicant - The fee charged shall be in accordance with the LAMC Section 19.01 B 1 a.

b. Notice Requirement
☐ Mailing List - The appeal notification requirements per LAMC Section 12.26 K 7 apply.
☐ Mailing Fees - The appeal notice mailing fee is made to City Planning's mailing contractor (BTC), a copy of receipt must be submitted as proof of payment.

G. NUISANCE ABATEMENT

1. Nuisance Abatement - Appeal procedure for Nuisance Abatement per LAMC Section 12.27.1 C 4

NOTE:
- Nuisance Abatement is only appealable to the City Council.

a. Appeal Fee

☐ Aggrieved Party the fee charged shall be in accordance with the LAMC Section 19.01 B 1.

2. Plan Approval/Compliance Review

Appeal procedure for Nuisance Abatement Plan Approval/Compliance Review per LAMC Section 12.27.1 C 4.

a. Appeal Fee

☐ Compliance Review - The fee charged shall be in accordance with the LAMC Section 19.01 B.

☐ Modification - The fee shall be in accordance with the LAMC Section 19.01 B.

NOTES

A Certified Neighborhood Council (CNC) or a person identified as a member of a CNC or as representing the CNC may not file an appeal on behalf of the Neighborhood Council; persons affiliated with a CNC may only file as an individual on behalf of self.

***Please note** that the appellate body must act on your appeal within a time period specified in the Section(s) of the Los Angeles Municipal Code (LAMC) pertaining to the type of appeal being filed. The Department of City Planning will make its best efforts to have appeals scheduled prior to the appellate body's last day to act in order to provide due process to the appellant. If the appellate body is unable to come to a consensus or is unable to hear and consider the appeal prior to the last day to act, the appeal is automatically deemed denied, and the original decision will stand. The last day to act as defined in the LAMC may only be extended if formally agreed upon by the applicant.*

This Section for City Planning Staff Use Only		
Base Fee:	Reviewed & Accepted by (DSC Planner):	Date:
Receipt No:	Deemed Complete by (Project Planner):	Date:
☐ Determination authority notified	☐ Original receipt and BTC receipt (if original applicant)	

(FOURTH submission to the DCP)

September 9, 2021

TO: CITY PLANNING COMMISSION

RE: CASE NUMBER: DIR-2018-6634-TOC
CEQA: ENV-2018-6635-CE
ADDRESS: 1251-1259 West Sunset Blvd. Los Angeles, CA 90026

APPELLANT:

Richard Courtney (abutting property owner on north east side), an individual
1001 Everett St.
Los Angeles, CA 90026

JUSTIFICATION/REASON FOR APPEALING DIRECTOR'S DETERMINATION dated August 26, 2021

Last Day to File an Appeal: September 10, 2021

INTRODUCTION

This document serves as the justification of this appeal filed in response to the Department of City Planning's (DCP) Letter of Determination (LOD), wherein Senior City Planner Heather Bleemers and Planning Assistant Stephanie Escobar improperly granted a Categorical Exemption (CE) and erroneously approved a Transit Oriented Communities (TOC) project located at 1251-1259 W. Sunset Blvd., also known to the community as the existing Stires Staircase Bungalow Court (Stires).

Page 16 of the LOD states:

> "*Pursuant to LAMC Section 12.22-A,25(f), only abutting property owners and tenants can appeal the Transit Oriented Communities Affordable Housing Incentive Program portion of this determination.*"

LAMC Section 12-22-A,25 states:
"Affordable Housing Incentives - Density Bonus."

LAMC Section 12-22-A,25(f) states:
"(f) Menu of Incentives. Housing Development Projects that meet the qualifications of Paragraph (e) of this subdivision may request one or more of the following Incentives, as applicable:..."

No code section was located within LAMC section 12.22-A,25(f) wherein it explicitly indicates the filing of an appeal is limited to abutting property owners and tenants, as the LOD suggests. I attempted to file this appeal as a representative of The Silver Lake Heritage Trust (SLHT) due to the LOD's lack of legal authority cited that indicates members of the public were prohibited from filing an appeal, however the Department of City Planning would not accept the appeal with SLHT listed as my co-appellant. I am appealing as the abutting property owner.

Any and all links to webpages in this document are considered part of this appeal. All content that exists at the link destination are to be included in this appeal.

The DCP failed to review the requirements and considerations *prior* to rubber stamping this project with a Categorical Exemption. Whereas CEQA Statute & Guidelines section **15061.** states**:**

> "(a) Once a lead agency has determined that an activity is a project subject to CEQA, a lead agency shall determine whether the project is exempt from CEQA.
>
> (b) A project is exempt from CEQA if:
>
> (1) The project is exempt by statute (see, e.g. Article 18, commencing with Section 15260).
>
> (2) The project is exempt pursuant to a categorical exemption (see Article 19, commencing with Section 15300) and the application of that categorical exemption is not barred by one of the exceptions set forth in Section 15300.2.
>
> **(3) The activity is covered by the common sense exemption that <u>CEQA applies only to projects which have the potential for causing a significant effect on the environment</u>. Where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA."**

The DCP erred in its discretion by granting a Categorical Exemption when impacts to the environment and public safety would be catastrophic and unmitigable, compromising the health and safety of the public as described in this appeal. As such, the proposal must be denied.

<u>THE PROPOSED PROJECT DOES NOT QUALIFY FOR BENEFITS UNDER A TOC AND IS IN CONFLICT WITH THE INTENTION OF TOC AND THE CITY'S OWN GENERAL PLAN</u>

Los Angeles Municipal Code Section 12.22(A)(25) states:

> **"(a) Purpose.** The purpose of this subdivision is to establish procedures for implementing State Density Bonus requirements, as set forth in California Government Code Sections 65915-65918, and to increase the production of affordable housing, consistent with City policies."

As seen above, the language of LAMC 12.22(A)(25) clearly states that the purpose of its section (Affordable Housing Incentives - Density Bonus) is to "**<u>to *increase* the production of affordable housing</u>**, consistent with City policies". Yet when doing the math, we see it is a fact that the proposed project REDUCES and **REMOVES** EXISTING LOW INCOME HOUSING, against City policies.

LAMC 12.22(A)(25) has no further explanation in its code section. Aside from its intention to establish procedures related to State Density Bonus requirements, its only remaining purpose as stated is to **"<u>*increase* the production of affordable housing"</u>. <u>The proposed project fails to do that.</u>** There exists no justification to approve this project when it so blatantly fails to meet the purpose of the code section it relies on for approval. On its face, this project does not comply with LAMC 12.22(A)(25) and should have been denied.

Today, and as has been for more than 99 years, the Stires site consists of **TEN** low income rental units and has been under the Rent Stabilization Ordinance since its inception. A total of **TEN** homes has accommodated ten separate individuals and/or families. Each tenant was or is paying approximately **$878.00** a month. Seven of the bungalows have been empty for more than a year due to the tenants being evicted via the Ellis Act. There are currently three tenant occupied bungalows. **This information is critical as the applicant has failed to include any information in his application paperwork showing there are rent paying tenants living in their bungalows.**

As seen here, the City once again approves a project that evicts long-time tenants in order to allow developers to build excessive and unnecessary luxury housing while putting on paper their sworn statement to throw in a few "low income" units, when there is no enforcement in place to ensure these units go to low income families, or that the low income units are even completed in the final project. There is no mechanism in place to keep track of how or to whom an affordable unit is assigned. In fact, buried in Measure JJJ (the measure responsible for the implementation of the TOC through the City's own interpretation), there is a clause which allows the applicant **to opt out of his affordable unit obligation by paying the City "in lieu fee"** if he finds the project will not pencil out with anticipated profit margins. It is an indisputable fact that this proposal **REMOVES existing affordable housing, forcing more individuals out of their homes, while the City simultaneously exacerbates their self-perpetuating homeless problem.**

LAMC 12.22(A)(31)(b)(2)(i) states:

> "An Eligible Housing Development shall be granted increased residential density at rates that shall meet or exceed a 35% increase."

LAMC 12.22(c)(1) clearly states:

> "A Housing Development Project that includes 10% of the total units of the project for Low Income households or 5% of the total units of the project for Very Low Income households, either in rental units or for sale units, shall be granted a minimum Density Bonus of 20%, which may be applied to any part of the Housing Development Project.
> The bonus may be increased according to the percentage of affordable housing units provided, as follows, but shall not exceed 35%."

The proposed seeks and was incorrectly granted a 50% density bonus increase, whereas the code specifies the bonus shall not exceed 35%. Furthermore, the proposal does not include 10% of the total units for Low Income Households. Either way, the proposed project has already failed to qualify as a TOC by failing to INCREASE the City's affordable housing stock, per its requirement to do so.

State law requires ordinances to conform to the City's General Plan. A General Plan must set out a statement of the City's development policies and objectives, and include specific elements among which are land use and circulation elements. (§ 65302,subds. (a) & (b).) ." Once the city has adopted a General

Plan, all zoning ordinances must be consistent with that plan compatible with the objectives, policies, and to be consistent must be general land uses, **and programs** specified in such a plan " (§ 65860, subd. (a) (ii).) (LESHER COMMUNICATIONS, IN v. CITY OF WALNUT CREEK). The proposal fails to do this.

The DCP has abused its discretion by approving a density bonus of 50% which is fifteen percent more than what the TOC permits, if this project were to qualify for TOC benefits in the first place, which it does not.

The City's Housing Element of its General Plan states:

> "Encourage and **incentivize the preservation of affordable housing**, including non-subsidized affordable units, **to ensure that demolitions and conversions do not result in the net loss of the City's stock of decent, safe, healthy or affordable housing.**" (HOUSING ELEMENT Appendix 5.1 OBJECTIVE 1.2.2)

The proposal guarantees a net loss in the City's stock of decent, safe and healthy affordable housing and conflicts with the City's housing element in its own general plan. The housing element of the City's General Plan **promotes the preservation** of affordable housing, and specifically advises ***against*** demolition. The DCP has abused its discretion by approving this project by way of the TOC against the entire purpose and intention of the TOC, in that it permanently removes ten existing and affordable, rent stabilized housing units. As such, the proposal must be denied.

THE LOD IS INCONSISTENT

The LOD on page 1, claims: *"six (6) units are reserved for Extremely Low Income (ELI) Household occupancy (page 1 of LOD)".*

The LOD on page 3 claims to replace "*a total of seven (7) dwelling units including: four (4) units restricted to Extremely Low Income Households; two (2) units restricted for* ***Very Income*** *Households, and one (1) unit restricted to low Income Households, for sale or rental as determined to be affordable to such households..*"

"Very Income" households is not quantifiable. The DCP erred in granting approvals to a project with no clear and specific knowledge of what type of units are intended to be built. This is in contradiction with itself and omits material information including details related to the Area Median Income (AMI) assigned to the evasive "affordable" units.

The applicant's Environmental Assessment Form ("EAF") states: *"8% (6 Units) will be set aside for extermely* [sic] *low income.*"

The DCP's application submitted by the applicant states: "*Setting aside 9% (6 unit s) for Very low income." It further states it will add: "40 Residential Units, 6 Affordable Units, 64 Market Rate Units.*"

Below that, it states: "*Tier 1- TOC, FAR and Height , for construction, use and maintenance of a 70 Unit apartment building with a total of 55,000 Sq. Ft. , Setting aside 8% (6 unit s) for Very low income.*" Even with its conflicting numbers and omissions, it is this application the DCP has relied on to approve this

project as a TOC, for which it does not qualify. Furthermore, the DCP has assigned a Tier of incentives to this project without knowing what type or how many "affordable" units it alleges to build.

INCORRECT DETERMINATION OF CATEGORICAL EXEMPTION

The Department incorrectly states the project is: "*exempt from the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines, Section 15332, Article 19 (Class 32), and there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies*:"

The DCP failed to review the below conditions prior to the erroneous granting of the exemption.

15061. REVIEW FOR EXEMPTION

(a) Once a lead agency has determined that an activity is a project subject to CEQA, a lead agency shall determine whether the project is exempt from CEQA.

(b) A project is exempt from CEQA if:

(1) The project is exempt by statute (see, e.g. Article 18, commencing with Section 15260).

(2) The project is exempt pursuant to a categorical exemption (see Article 19, commencing with Section 15300) and the application of that categorical exemption is not barred by one of the exceptions set forth in Section 15300.2.

(3) The activity is covered by the common sense exemption that CEQA applies only to projects which have the potential for causing a significant effect on the environment. Where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA.

(4) The project will be rejected or disapproved by a public agency. (See Section 15270(b)).

(5) The project is exempt pursuant to the provisions of Article 12.5 of this Chapter.

(c) Each public agency should include in its implementing procedures a listing of the projects often handled by the agency that the agency has determined to be exempt. This listing should be used in preliminary review.

(d) After determining that a project is exempt, the agency may prepare a Notice of Exemption as provided in Section 15062. Although the notice may be kept with the project application at this time, the notice shall not be filed with the Office of Planning and Research or the county clerk until the project has been approved.

(e) When a non-elected official or decisionmaking body of a local lead agency decides that a project is exempt from CEQA, and the public agency approves or determines to carry out the project, the decision that the project is exempt may be appealed to the local lead agency's elected decisionmaking body, if one exists. A local lead agency may establish procedures governing such appeals.

15063. INITIAL STUDY

(a) Following preliminary review, the Lead Agency shall conduct an Initial Study **to determine if the project may have a significant effect on the environment.** If the Lead Agency can determine that an EIR will clearly be required for the project, an Initial Study is not required but may still be desirable.

CEQA EXEMPTIONS: 15332. IN-FILL DEVELOPMENT PROJECTS

Class 32 consists of projects characterized as **in-fill** development meeting the conditions described in this section.

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

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

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

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

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

The DCP defines "in-fill development" as: "*Development of vacant or underutilized land within urbanized areas.*"

Yet the proposed site is not vacant nor is it underutilized. To the contrary, this is a well established, diverse and thriving community with longstanding ties to the immediate neighborhood. "Infill-development" is further defined as being more "***than the piecemeal development of individual lots****. Instead, a successful infill development program should focus on the job of crafting complete, well-functioning neighborhoods".* This project seeks to destroy the well-functioning neighborhood that already exists.

RELEVANT NEIGHBORING PROPERTIES

Approximately 60 feet north of the Stires property at 1185-1247 ½ W. Sunset Blvd. and 917 N. Everett St., a previous proposal never received final approvals after the developers (Aragon) produced a subsurface investigation and geological studies report as required by the City. According to the proposal's 2014 Staff Report, the Stires site is recognized as "the adjoining property" and co-exists in a Methane Zone and hillside area. The investigations produced evidence proving consequential unmitigable issues concerning public safety. A true and correct copy of the August 6, 2014 DCP Staff Report related to the Stires staircase neighboring property at 1185-1247 ½ W. Sunset Blvd. and 917 N. Everett St. is attached hereto as EXHIBIT A. **Due to concerns over public safety due to seismic instability, that project was shut down**.

This alone should have triggered a full environmental review for the current proposal, including but not limited to similar safety regulations and requirements brought forth in the 2014 report. These include slope stability, seismic issues, groundwater dewatering measures, a methane assessment and ventilation plan, an asbestos-containing operation and maintenance plan, and the abatement plan for any other existing hazardous construction materials. If it was a reasonable requirement for Aragon to perform environmental and geological studies for the Stires properties next door, the same common sense requirements apply here when the health and safety of the public is at risk.

The applicant signed, under penalty of perjury, that he has "submitted the written justifications identified in the Specialized Instructions, and any supporting documents and/or technical studies to support your position that the proposed project is eligible for the Class 32 Exemption, and the project does not fall under any of the exceptions pursuant to CEQA Section 15300.2". Yet the 2014 report that was performed on the adjoining properties at 1185-1247 ½ W. Sunset Blvd. was not submitted or mentioned anywhere in the application. The applicant's Environmental Assessment Form (EAF) says its project intends to grade an estimated **19,885 cubic yards of dirt**. The applicant alleges "NO" Hazardous Materials and Substances exist on the land and no contamination exists. Yet both the DCP and the applicant fail to mention that this project is in a Methane Zone and riddled with a documented history of environmental and seismic issues. Had the Department conducted an initial study, they would have learned of the dangers and threat to public safety, such as: methane, seismic concerns, slope instability and toxic substances released by the removal of almost 20,000 cubic yards of dirt. The altering of our City's topography does not go without consequences and should have been more closely examined by the DCP. The applicant's EAF form indicates the applicant submitted documents and/or technical studies to support his position that the proposed Project is eligible for the Class 32 Exemption and the project does not fall under any of the Exceptions pursuant to CEQA Section 15300.2. **However, the appellant was unable to locate any supportive documentation and the DCP has not provided them.**

In a new geology and soils report dated September 8, 2021 and attached hereto as EXHIBIT B, Principal Geologist Ken Wilson concludes: "Our review indicates several technical issues that we feel should be considered and addressed prior to approval of the project as it is currently defined. In particular, the Methane Zone hazards, potential fault locations/activity levels and bedrock slope stability due to the proposed slope angles, the dip angles of existing bedrock bedding, assumed material strengths, presence of fractures, up slope groundwater/seepage, and orientation/height of the proposed permanent and temporary slopes.

The Categorical Exemption granted is inappropriate due to the evidence of seismic instability stemming from the Lamar and/or Earth Consultants (ECI) fault lines. The proximity of the ECI fault line is especially troubling. According to the new geology report (EXHIBIT B), this is the same fault line which resulted in **the demolition of two new buildings** in December 2004 at the Roybal Belmont High School site, less than a mile to the southwest, due to potential seismic danger.

Additionally, the failure to consider the cumulative impacts in those situations where there are multiple projects, especially in residential hillside areas, such as this one that are being approved and built within close proximity, must be taken under consideration. Right now, there is massive grading and preparation for a 50 unit project on the three parcels immediately to the north of my home. There are two new projects being completed to my south. There is another project slated for Sunset Blvd. below me, a couple parcels to the north. If this project is approved, I am an island surrounded on three sides of my property by massive ongoing construction projects. The City's practice of ignoring the issue of cumulative impacts is irresponsible and unjust to the population who endure the compounded environmental impacts where these multiple projects occur.

As the owner of the abutting property, my property is significantly impacted by the grading and vibrations caused by this project. There is a proven instability of the slope on every side of my hillside property. Furthermore, my property is designated as one of the City's historic cultural monuments. This proposal puts my entire property, my safety and my property's historical status at risk. The DCP erred by putting this project's approval in higher regard than public safety.

The DCP has ostensibly approved this project on the basis of a TOC, and the site is supposedly being designed for transit-dependent living. This should negate any need for the massive excavation of dirt and disruption of the local hillside topography to create two entire underground floors dedicated only to parking cars.

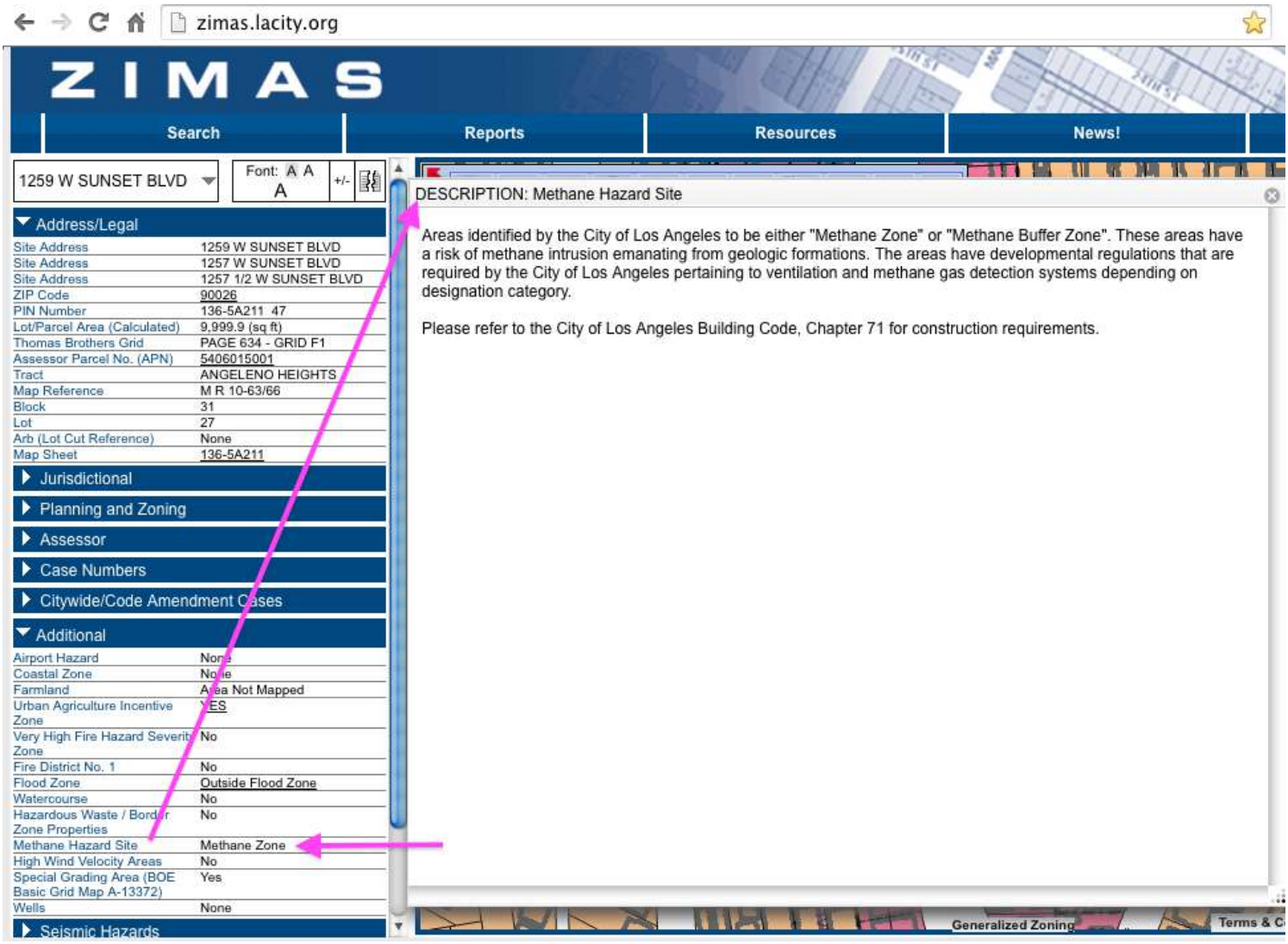
The proposal fails to qualify for a Categorical Exemption as required in section *15332(c)*. There is no evidence in the record showing "*the site has no value as habitat for endangered, rare or threatened species*". The record is silent as to any objective study regarding the wildlife in this area, particularly the presence of birds and how this project would violate the Migratory Bird Treaty Act, as the proposal threatens to remove approximately 16 mature trees that provide habitat to local and migratory wildlife and additional benefits to the community that have been established for decades. Please see the attached study included herein and referenced as EXHIBIT C: The Human Footprint and the Last of the Wild which provides the evidence to support "...**the higher the density and the smaller the park, the higher the extinction rate.**" (page 2 ¶ 8). Please also see EXHIBIT D: The Large Tree Argument, which provides the evidence to support existing trees, such as the 16 trees at Stires, to provide energy conservation, clean air, clean water, attractive surroundings which provide emotional and mental benefits, and enhanced real estate values. A developer's promise to plant new trees **fails to justify** cutting down mature, established trees which provide countless benefits to the community.

The DCP approving the destruction of 80 year old trees is an unconscionable incentive. Considering the net carbon increase this proposal will impose on the community with the addition of 64 dwelling units and up to 128 additional vehicles, the applicant insists on removing the very resource we need to reduce the additional carbon footprint he is imposing. These 16 trees serve as habitat to this environment and are heavily relied on; their removal constitutes a significant negative impact. The proposal fails to comply with section 15332(d) by alleging it *"would not result in any significant effects relating to traffic, noise, air quality, or water quality."*

The Air Quality study in the case file (finally obtained after several requests), was conducted for this project by a company hired by the developer who has an interest in the outcome of his report. There is no evidence in the record proving the demolition alone of the ten 99-year-old homes does not impact air quality. This is an air quality issue even before the topography of this hillside is interrupted and destroyed by the removal of 19,885 cubic yards of earth, and underground particles are released into the environment. Considering the site is a Methane Hazard Site (the Director's Determination is **silent** on this fact), the applicant is required to obtain an Authority to Construct from a local Air Pollution Control District (APCD) or Air Quality Management District (AQMD) due to the air pollutants (including but not

limited to PM (re-entrained road dust), asbestos, diesel PM, NOx, CO, SOx, PM10, VOCs that **will be** emitted into the community and environment for no other reason than the project. The City describes a Methane Zone as:
"..areas **have a risk** of methane intrusion emanating from geologic formations. The areas have developmental regulations that are required by the City of Los Angeles pertaining to ventilation and methane gas detection systems depending on designation category."

Please see this screenshot taken from Zimas.lacity.org below:



Two brand new buildings at the future Edward R. Roybal Learning Center (originally the Belmont Learning Complex project), approximately 0.8 of a mile from Stires, had to be demolished in December of 2004. These buildings were built atop an earthquake fault on the 35-acre site (formerly known as the Los Angeles Oil Field) which is plagued with toxic hazards such as methane gas and hydrogen sulfide. Please see the information provided at the two links below:

https://www.fulldisclosure.net/series/lausds-238-million-belmont-demolished/
https://www.latimes.com/local/la-me-belmont10-2008aug10-story.html

The concerns at Belmont/Roybal and other campuses built over oil fields or polluted ground ultimately led to independent oversight of environmental issues through the State's Department of Toxic Substances Control.

The Department failed to consider these risks and how we and the public would be impacted. The proposal is not exempt from CEQA as alleged by the DCP. By approving this project in such an irresponsible manner, the DCP has shirked its duty to protect the people by neglecting the safety, health and well-being of the citizens who are the bearers of the brunt of these impacts.

The DCP is unable to see with certainty that there is no possibility that the activity related to this project may have a significant effect on the environment. Therefore, this project is indisputably subject to CEQA.

DESTRUCTION OF A HISTORIC RESOURCE

The approval of this destructive project will also result in the demolition of the Stires Staircase Bungalow Court, a historical resource which was approved and recommended by the Cultural Heritage Commission on **ALL THREE AVAILABLE CRITERIA** of the Cultural Heritage Ordinance on August 6, 2020. Please see the below link of the HCM packet for Stires:

STIRES STAIRCASE BUNGALOW COURT 1251-1259 West Sunset Boulevard CHC-2020-896-HCM ENV-2020-897-CE Agenda packet includes: 1. Fi

The Cultural Heritage Commission are the City's appointed experts in the field of historic analysis, identification and preservation. **In a rare move**, they voted against the negative Staff Recommendation from the Office of Historic Resources and approved designation of this site on the merits of **all three criteria**: its bungalow court architectural style, its relationship to the cultural and commercial identity of the community with the advent of the local streetcar line, and the connection to one of Southern California's earliest female banking executives, Lilly Bennett Baldwin Howard, who owned these bungalows as part of her estate from 1934 until 1950. Stires has proven to be a one of a kind invaluable historic resource and is eligible for state recognition through the California National Register. **Note: It is incredibly rare that a potentially historic resource is found to meet all three of the criteria set forth by the Cultural Heritage Ordinance.** This trifecta determination of historic importance from the Cultural Heritage Commission cannot be discounted. Attached hereto as EXHIBIT E is a true and correct copy of the Cultural Heritage Commission's recommendation letter to PLUM, stating: "The Stires Staircase Bungalow Court meets all three of the Historic-Cultural Monument criteria".

CITY CHARTER CODE CONFLICTS WITH TOC "GUIDELINES"

The TOC cannot be approved because it is inconsistent with the development standards ***as laid out in the Charter Code***. The TOC "Guidelines are **subject** to the Charter; they do not **supplant** the Charter. The TOC "Guidelines" recommended by the City Planning Commission were **not approved by the City Council**, and no application was filed to invoke the mandates of the City Charter.

The City Charter code Sec. 556. General Plan Compliance controls compliance with the City's General Plan. The TOC "Guidelines" never went before members of the City Council - the only legislative body having authority to adopt a recommendation made by the City Planning Commission.
City Charter code Sec. 558. Procedure for Adoption, Amendment or Repeal of Certain Ordinances, Orders and Resolutions.

Measure JJJ does not amend either Charter Section 555 or LAMC Section 11.5.6. To effectuate a change to the general amendment protocol would have required a Charter Amendment and an amendment to LAMC Section 11.5.6.

City Charter Code Section 551. City Planning Commission states:

> "The Board of Commissioners of the City Planning Department shall be known as the City Planning Commission and shall consist of nine members. It shall:
> (a) give advice and make recommendations to the Mayor, Council, Director of Planning, municipal departments and agencies with respect to City planning and related activities and legislation;
> (b) make recommendations concerning amendment of the General Plan and proposed zoning ordinances in accordance with Sections 555 and 558;
> (c) make reports and recommendations to the Council and to other governmental officers or agencies as may be necessary to implement and secure compliance with the General Plan; and
> (d) perform other functions prescribed by the Charter or ordinance."

City Charter Code Section 558.(b)(2) Procedure for Adoption, Amendment or Repeal of Certain Ordinances, Orders and Resolutions states:

> "(2) Recommendation of the City Planning Commission. After initiation, the proposed ordinance, order or resolution shall be referred to the City Planning Commission for its report and recommendation regarding the relation of the proposed ordinance, order or resolution to the General Plan and, in the case of proposed zoning regulations, whether adoption of the proposed ordinance, order or resolution will be in conformity with public necessity, convenience, general welfare and good zoning practice. The City Planning Commission shall act within the time specified by ordinance. After the City Planning Commission has made its report and recommendation, or after the time for it to act has expired, the Council may consider the matter. Failure to act within the time prescribed by ordinance shall be deemed to be a recommendation of approval by the City Planning Commission of the proposed ordinance, order or resolution.
> (3) Action by the Council. Before adopting a proposed ordinance, order or resolution, the Council shall make the findings required in subsection(b)(2) of this section.
> (A) Planning Commission Recommendation of Approval. If the City Planning Commission recommends approval of the proposed ordinance, order or resolution, the Council may adopt an ordinance, order or resolution conforming to the Commission recommendation by majority vote."

The site location is on Special Grading Area (BOE Basic Grid Map A-13372) as seen in EXHIBIT F which is a true and correct copy of a screenshot taken from ZIMAS.lacity.org. Hillside grading areas require soils and geology reports in order to ensure public safety. The DCP's approval of the proposed by going through the medium of a TOC circumvents this requirement, avoiding the Department's responsibility to consider public safety prior to approving a project.

Should the applicant have gone through the normal channels to seek the incentives which the DCP incorrectly approved, the City Charter Code section 562. would require:
"*conditions that will remedy a disparity of privileges and that are* ***necessary to protect the public health, safety or welfare and assure compliance with the objectives of the General Plan and the purpose and intent*** *of the zoning ordinance. A variance shall not be used to grant a special privilege or to permit a use substantially inconsistent with the limitations upon other properties in the same zone and vicinity. The Zoning Administrator may deny a variance if the conditions creating the need for the variance were self-imposed."*

Charter §555, and its implementing ordinance, LAMC §11.5.6 (general plan) and LAMC §11.5.7 (as to specific plans) control the process and protocol attendant to *general plan amendments*. Charter Section §558 and its implementing ordinance LAMC §12.32 control the protocol attendant to the effectuation of *zone changes*.

The TOC "Guidelines" are inconsistent with the Charter; it is void ab initio. *Lesher Communications vs. the City of Walnut* (1990) 52 Cal. 3d 531 (voter passed initiative ordinance effectuating de facto zoning changes which otherwise conflict with a City's general plan is void *ab initio*). By application of the same logic, any ordinance which conflicts with the City's charter is void *ab initio*. The TOC "Guidelines" conflict with the City Charter because, as applied to this project, it creates changes to the City's zoning law and zoning development standards which are inconsistent with the Charter.

The DCP proceeds as if the TOC "Guidelines" are to be implemented in the same manner as if they were a council-approved ordinance (which they are not). It even falsely lists the "Guidelines" as an ordinance on its webpage. Unlike the lawful ordinances in this list, which all have an implementing ordinance number, **the TOC Guidelines have no implementing ordinance number**.

The City Council never approved a TOC implementation ordinance, as required by state law (California Govt. Code Section 65915(d)(C)(3). Legislative approval under the City Charter requires the Council's action. The Planning Commission is only an advisory body under Charter Section 551. Only the City Council can grant legislative approval. It has not yet granted implementation authority for TOC. In the absence of an implementation ordinance, TOC approvals are ultra vires.

CONCLUSION

The City refers to its General Plan as its "*blueprint for the future, prescribing policy goals and objectives to shape and guide the physical development of the City"*. The City's health plan, titled "Plan for a Healthy Los Angeles" chapter one is titled "*Los Angeles, a Leader in Health and Equity", stating: "where a person lives often determines their health destiny"*. Yet as seen here, the lead agency for the City of Los

Angeles charged with the responsibility for land use approvals, **neglects to mention this proposal's dangerous ramifications and how they affect the citizens of this City. The DCP cannot grant approvals when there is an adverse impact to public health and safety.** Appellants are aggrieved by the DCP's careless and reckless decision to approve such a dangerous and harmful project.

Additionally, the City Planning Commission needs to be made aware of the many requests that were made by members of the public seeking to review the files related to this case. The DCP ignored many of these requests and neglected to provide access to case files. Appellants find this an abuse of authority and an obstruction of the public's right to participate.

As of the time of the filing of this appeal there has been no posting of the Categorical Exemption filed with the county (according to the filings posted here: https://apps.lavote.net/CEQA). Therefore, the statute of limitations has not yet begun. Appellants and other aggrieved parties having standing to bring a legal action against the City of Los Angeles and Real Parties in Interest, reserve our rights to seek judicial intervention after exhausting our administrative remedies.

Sincerely,

EXHIBIT A

VESTING TENTATIVE TRACT MAP NO. 72553-CN (stamped map-dated October 22, 2013)

HEARING DATE: August 6, 2014

PLANNING DEPARTMENT STAFF REPORT

PURSUANT TO ORDINANCE NO. 164,845, IF A CERTIFICATE OF POSTING HAS NOT BEEN SUBMITTED BEFORE THE DATE OF THE PUBLIC HEARING, IT MUST BE PRESENTED AT THE HEARING, OR THE CASE MUST BE CONTINUED.

REQUEST

Pursuant to the Los Angeles Municipal Code Sections 17.15, Vesting Tentative Tract Map No. 72553-CN to permit the merger of 16 lots for the subdivision and construction of 214 residential units and 8,406 square feet of commercial space, located in two separate buildings, providing a total of 300 vehicular and 243 bicycle parking spaces on a net 115,734 square-foot (2.657 acre) site in the C2-VL Zone. The project site is located at 1185 – 1247 ½ W. Sunset Boulevard and 917 N. Everett Street.

Pursuant to Section 21082.1(c)(3) of the California Public resources Code, adopt the Mitigated Negative Declaration (MND) for the above referenced project.

RELEVANT CASES

ON-SITE:

Case No. CPC-2013-3319-DB-SPR: This is a concurrent City Planning Commission request, pursuant to LAMC Section 12.22-A,25(c). By reserving 7% (or 15 units) of its proposed 214 units for very low income households, the project is eligible for a 25% density bonus increase and, thereby, the on-menu incentive for a 25 percent increase in the permitted floor area ratio. The project will utilize parking option one to allow two parking spaces for each unit with 2 to 3 bedrooms and one parking space for each unit with 0 to 1 bedrooms. In addition, the applicant is seeking approval of the three following off-menu incentives or waivers:

1. A 15-foot height increase to permit a maximum overall height of 72 feet as measured from the lowest natural grade to the highest point of the roof structure and to permit a 21-foot height increase from the maximum plumbline height of 45 feet for Building A;

2. A 4-foot height increase to permit a maximum overall height of 61 feet as measured from the lowest natural grade to the highest point of the roof structure and to permit a 14-foot height increase from the maximum plumbline height of 45 feet for Building B; and

3. To permit a five-story mixed-use building in lieu of three stories for Building A.

The property is located in the Silver Lake – Echo Park – Elysian Valley Community Plan, approximately ½ mile north of Downtown Los Angeles, and located in the Echo Park neighborhood of the community plan. The area is made up of primarily residential land uses (42 percent), divided as single-family residential use (14 percent) and multiple-family use (28 percent).

The subject site is zoned C2-VL and has a General Commercial land use designation. The 1VL – Height District, which for a C zone, allows up to 45 feet, 3 stories for commercial uses (unrestricted number of stories for residential use) and a floor area ratio of 1.5:1. The site is a within methane zone, a hillside area, and the East Los Angeles State Enterprise Zone, which permits a reduction in required commercial parking of 2 spaces per 1,000 square feet.

Due to the age of the on-site structures, a historical assessment was done as a part of the project's expanded initial study to determine if they were eligible for historic designation. Upon completion of the study, properties were found to be ineligible for listing at the national, state, or local levels because their lacking in historical significance, architectural distinction, and/or physical integrity. No designated or surveyed historical landmarks, monuments, or resources exist on the project site. The project site is not within a City Historic Preservation Overlay Zone, and no historical resource district exists to which any of existing buildings on-site contribute.

A mix of residential uses, including single-family and low-density multiple-family residential structures, makes up the general character of the surrounding neighborhood In relation subject property, Northerly, the adjoining property is zoned C2-1VI and improved with a 10 unit development, containing 10 individual structures that are accessed from a shared staircase; Southerly, across Everett Street, the adjoining property is zoned C2-1VL and improved with an auto repair establishment; Easterly, the adjoining properties are zoned [Q]R3-1VL and improved with single- and multiple-family residential buildings that front along Everett Street; and Westerly, across Sunset Boulevard, the adjoining properties are zoned C2-1VL and are improved with community commercial and multiple-family uses. Everett Park is located within 500 feet northeast of the project site.

Under the existing C2-1VL Zone, which is consistent with the site's General Commercial land use designation in the Silver Lake – Echo Park – Elysian Valley Community Plan, the subject property could be developed with a maximum of 263 apartment units, based on a project area of 105,524 square feet and the permitted density of one dwelling unit per 400 square feet.

The applicant is requesting to permit the merger of 16 lots for the subdivision and construction, use, and maintenance of two multiple-family residential buildings, one live/work (Building A) and one mixed use (Building B), containing a total of 214 residential condominiums, 5 commercial condominiums, and a total of 300 parking spaces. Building A is located along Sunset Boulevard and Building B is located at the corner of Sunset Boulevard and Everett Street. Building A will contain 167 live/work units and 2 ½ levels of parking. Building B will contain 47 residential and 5 commercial condominiums, with 1 level of parking. The entire development will contain a fitness room, community room, and lunge. The development will also have two roof terraces and a 5,988 square-foot

conditions stated in the memo dated December 19, 2013. See recommended conditions in **Draft Tentative Tract Report with Conditions** under department.

BUREAU OF STREET LIGHTING: No comments were available at the writing of the staff report.

ENVIRONMENTAL CLEARANCE

The Department of City Planning issued Mitigated Negative Declaration No. ENV-2013-3320-MND on July 30, 2014. See **Draft Tentative Tract Report with Conditions.**

TENANTS

The subdivider has not provided a list of any tenants.

STAFF RECOMMENDATIONS

The Planning Department staff recommends approval of Vesting Tentative Tract Map No. 72553-CN, subject to the standard conditions and the additional conditions in the **Draft Tentative Tract Report with Conditions.**

Prepared by:

Jenna Monterrosa
City Planning Associate
(213) 978-1377

Note: Recommendation does not constitute a decision. Changes may be made by the Advisory Agency at the time of the public hearing.

Code, including planting fast-growing annual and perennial grasses in areas where construction is not immediately planned.

CM-12. Geological Investigation and Engineering Requirements

(a) The design of the structure shall consider groundwater at a depth of 8 feet below the ground surface as measured at the sidewalk elevation.

(b) The existing fill soils, in addition to the upper two feet of alluvial soils shall be removed and recompacted.

(c) The proposed structure shall be supported on conventional foundations where the rock is exposed and deepened foundations excavated through the fill and alluvium where bedrock is deeper; the footings shall extend to 15 feet in depth. As an alternative, where deepened footings are necessary, cast-in-place drilled friction piles shall be used. A combination of conventional foundations and friction piles shall be used as long as both types are supported in the bedrock.

(d) If the building is designed and constructed with a cold joint at the transition between bedrock and fill/alluvium, the building shall be supported exclusively on shallow conventional foundations. If this option is selected, all of the fill soils must be removed and compacted, and the footings must be underlain by at least 3 feet of newly compacted fill soils.

(e) The finish floor slab shall be designed and constructed as a conventional slab where the slab is above the ground water surface. Where the finish floor is below the groundwater surface, the slab must be designed to accommodate the hydrostatic uplift.

(f) Groundwater will be encountered during construction. Dewatering measures shall be considered. It is recommended that a groundwater monitoring well be installed on the area of the two level parking garage and another at the location of the deeper alluvium. The purpose of the wells is to identify static water depths and to estimate dewatering qualities.

(g) The slope stability calculations required leaving the terrace in place at the top of the slope near Cross Section E-E'. The terrace shall be regarded to include a 2-foot thick layer of relatively impermeable soil to prevent infiltration. The layer shall be graded so that water flows

(b) The project shall comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the proposed project, and as it may be subsequently amended or modified.

CM-15. Safety Hazards. The developer shall install appropriate traffic signs around the site to ensure pedestrian and vehicle safety.

CM-16. Greenhouse Gases. Only low-VOC-containing paints, sealants, adhesives, and solvents shall be utilized in the construction of the project

CM-17. Methane Zone. A methane assessment shall be conducted for the Site prior to any future redevelopment activities. All multiple residential buildings shall have adequate ventilation as defined in Section 91.7102 of the Municipal Code of a gas-detection system installed in the basement or on the lowest floor level on grade, and within the underfloor space in buildings with raised foundations.

CM-18. Asbestos-Containing Materials Operation & Maintenance Plan

(a) Based on the potential presence of asbestos-containing materials, the property owner shall implement an Operations and Maintenance (O & M) Plan which stipulates that assessment, repair and maintenance of damaged materials be performed to protect the health and safety of the building occupants.

(b) An asbestos survey adhering to Asbestos Hazard Emergency Response Act (AHERA) sampling protocol shall be performed prior to demolition or renovation activities that may disturb ACMs. This requirement shall be enforced by the local air pollution control or air quality management district, and specifies that all suspect asbestos-containing materials (ACMs) be sampled to determine the presence or absence of asbestos prior to any renovation or demolition activities to prevent potential exposure to workers and/or building occupants.

CM-19. Explosion/Release (Existing Toxic/Hazardous Construction Materials) (Asbestos). Prior to the issuance of any permit for the demolition or alteration of the existing structure(s), the applicant shall provide a letter to the Department of Building and Safety from a qualified asbestos abatement consultant indicating that no Asbestos-Containing Materials (ACM) are present in the building. If ACMs are found to be present, it will need to be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other applicable State and Federal rules and regulations.

EXHIBIT B

September 8, 2021

Richard Courtney
1001 Everett St.
Los Angeles, CA 90026
&
The Silver Lake Heritage Trust
2568 Griffith Park Boulevard #277
Los Angeles, CA 90039

SUBJECT: Engineering Geology Review of Conditions at and Adjacent to the Properties at 1251 through 1259 West Sunset Boulevard, Los Angeles, California

REFERENCES: See attached References Cited

Dear Mr. Courtney and Trust Representative:

At your request we have reviewed the pertinent readily available geotechnical, geologic, and fault reports and maps with regard to the proposed development location, and the engineering geology conditions at the 1251 through 1259 property (herein referred to as the "subject properties"). There were reports prepared by Geotechnologies, Inc.in 2013 and 2014 for a proposed project immediately south of the subject properties. The reports had associated City of Los Angeles review comment letters and responses. The references used are provided at the end of this letter report. Our objective was to determine if there are potentially adverse hazardous conditions, which could impact the proposed development, adjacent properties and public safety.

Background

The "subject properties" consist of two rectangular lots (APNs 5406-016-026 and 5406-015-001) elongated east-west, each approximately 50 feet wide and 200 feet long (ZIMAS, 2021, http://zimas.lacity.org/). The proposed project (City of Los Angeles, 2021) consists primarily of a 70-unit multi-family apartment building and 35 parking spaces. The parking spaces appear to be at the surface on the rear building's roof.

Based on the available proposed site plans (City of Los Angeles, 2021), it is clear that temporary and possibly permanent cut slopes would border the north, south, and east edges of project. The temporary cut slopes would likely be up to approximately several feet to roughly 20- to 35-feet high. The adjacent lot immediately to the south has proposed and existing 30- to 35-feet high steep slopes facing south and west (Geotechnologies, Inc. 2013).

You have indicated that no geologic or geotechnical investigations have been conducted on the subject properties. There is no indication that historic aerial photographs were interpreted to determine pre-development geologic conditions at the site, for example evidence of landslides, faulting, or oil/gas drilling/development. There is no indication in the City of Los Angeles' 2018 Environmental Assessment Form (EAF) that an assessment of potential Methane Zone hazards has been addressed (ZIMAS, 2021, http://zimas.lacity.org/).

General Geologic Conditions

To our knowledge no geologic mapping has been performed at the subject properties, in connection with the proposed project. Immediately to the south (Geotechnologies, Inc., 2013) three geologic units are mapped: 1) Quaternary colluvium (map symbol Qcol), 2) Quaternary alluvium (Qal), and 3) Tertiary (Miocene) Puente Formation bedrock (Tp). Based on the size of the proposed apartments and associated parking area, the subject properties areas of with Qcol and Qal would be removed from the site, so that in those areas only Tp bedrock would remain. Although not mapped, it is likely that man-made artificial fill (af) would be found at the western portions of the subject properties and would be removed as part of the 18,200 to 19,885 cubic yards of export per the EAF.

Puente Formation is generally a well-bedded clayey siltstone with sandy siltstone (Geotechnologies, Inc., 2013) that is yellowish to grayish brown and brown in color. Geologic bedding (distinct layering in the bedrock) in the Puente Formation is tilted (dips) to the south, with variations to the southeast and southwest. Bedding orientation (mainly dip direction and amount in degrees) is critical to determining slope stability. Data on Geotechnologies, Inc. (2013) cross-section D-D' (discussed below) indicates claystone and siltstone bedding dips to the south at the south edge of the subject properties. Fractures mapped in test pits excavated and mapped in 2013 (Geotechnologies, Inc., 2013) would be important to slope stability analysis since they are planes of weakness that can separate materials into smaller block and wedge failures on cut slopes where they intersect bedding planes. Slope failures potentially affect public safety.

Faulting

Geologic faults, which can be classified as non-active, potentially active, or active. No fault mapping has been performed at the subject properties. Lamar (1970) maps a north-northwest to south-southeast trending fault a few hundred feet west of the subject properties (see Figure 1). It is not known if this fault is associated with the underlying active Elysian Park blind thrust fault, and if any potential for surface rupture/deformation exists. Due to expected mapping accuracy at the 1:24,000 map scale, the fault location could be off by a few hundred feet.

Earth Consultants, Inc. (ECI; 2003) identified what appears to be two potentially active faults at Belmont Learning Center site that project directly north-northeast toward the subject properties. ECI performed extensive state-of-the-practice trench excavations and geologic logging within the Belmont Learning Center site (overlay on Google Earth image, Figure 1). Based on the study results, the Los Angeles Unified School District made the decision to demolish all existing buildings within 50-feet of the mapped fault traces. Because the Belmont Learning Center site had been subjected to prior grading that removed younger alluvium required to provide absolute proof of fault activity, the final assessment of the degree of potential activity was indeterminate.

Figure 1 shows the ECI faults, projected along the strike direction, to pass through and very near the subject properties. The distance of the projection appears reasonable based on the similarly oriented and similar length fault mapped by Lamar (1970) west of the Belmont Learning Center. The potential for these ECI faults to project to the north-northeast through the subject properties raises the concern that a potentially active fault (for which LAUSD demolished several useable buildings) could underlie the subject properties. No studies have been performed, or have been required, for the proposed 70-unit multi-family apartment building and associated 35 parking spaces. An active or potentially active fault would have public safety implications.

Slope Stability Considerations

Geotechnologies, Inc. (2013) prepared five geologic cross-sections A-A' through E-E' for the project proposed south of the subject properties to analyze the slope stability for temporary and permanent slopes planned for the proposed mixed use/retail development area. Section D-D' extends north into the subject properties (Figure2) and is oriented generally north-south through the approximately 35-feet high vertical proposed temporary cut slope at the north edge of the property immediately adjacent to the subject properties. Section D-D' shows geologic apparent bedding angles out of the temporary vertical slope dipping at angles up to approximately 25 degrees. Geotechnologies, Inc. (2013) Test Pit 5 (TP5) located immediately south of the 1251 site indicates cross-cutting vertical joints that are expected to exist beneath the subject properties.

This "out-of-slope" bedding condition (Figure 2) indicates that the southern portion of the 1251 site is potentially unstable and a bedding plane failure is possible with movement to the south or southeast. Geotechnical exploration, laboratory testing, and slope stability analyses are necessary to determine the degree of potential instability and the level of hazard posed by the proposed development to the 1251 site and surrounding areas see Figure 2 red cloud areas). To our knowledge no such studies, testing, or analyses have been performed.

Considering the geologic structures (bedding and joints) as discussed above, some mapped bedding attitudes (e.g., see the attitude of ~20 degrees in section D-D') would exhibit an out-of-slope component. Translational failure slope stability analyses along such a component could be critical, which could impact the feasibility of the slope design. In addition, some of the vertical joints might also present areas of weaker strength affecting the slope stability calculations. Therefore, these factors should be accounted for as necessary in translational failure slope stability analyses in the areas shown on Figure 2.

Groundwater or seepage was noted in borings excavated at the site and discussed by Geotechnologies, Inc. (2013). Structures upslope from the project site appear to be in areas where rainfall, irrigation, and surface run off could infiltrate the ground surface and flow down gradient toward the project site. It is assumed that the pathways would be predominantly along fractures and bedding planes in the Puente Formation bedrock. This condition should be fully considered in slope stability analyses.

Summary

Our review indicates several technical issues that we feel should be considered and addressed prior to approval of the project as it is currently defined. In particular, the Methane Zone hazards, potential fault locations/activity levels and bedrock slope stability due to the proposed slope angles, the dip angles of existing bedrock bedding, assumed material strengths, presence of fractures, up slope groundwater/seepage, and orientation/height of the proposed permanent and temporary slopes.

Closure

This report has been prepared for the sole use and benefit of the addressees. The analysis, results, and conclusions were prepared in general compliance with normal industry practice in Los Angeles County. Other consultants may arrive at different results and conclusions with the same information. The intent of the report is to advise our client of engineering geologic and related conditions at the subject site, and the possible effects of these conditions on the proposed

development and surrounding properties. It should be understood that the engineering geologic consulting provided represents professional opinions and the contents of this report are not perfect. Any errors or omissions noted by any party reviewing this report should be reported to Wilson Geosciences Inc. in a timely fashion. Only the client can authorize subsequent use of this report. No warranty is either expressed or implied.

Please contact the undersigned if you have any questions.

Sincerely,

WILSON GEOSCIENCES INC.

Kenneth Wilson
Principal Geologist
P.G. #3175, C.E.G. #928
(626) 791-1589

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REFERENCES CITED

City of Los Angeles, 2018, Environmental Assessment Form for Case Number ENV-2018-6635-EAF, filed 11/13/2018.

City of Los Angeles, 2021, Director's Determination Transit Oriented Communities Affordable Housing Incentive Program, August 26, 2021, 34 pages.

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Geotechnologies, Inc., 2014, Response to Soils Report Correction Letter, Proposed Apartment Complex, 1185 West Sunset Boulevard, Los Angeles, California, dated March 4, 2014.

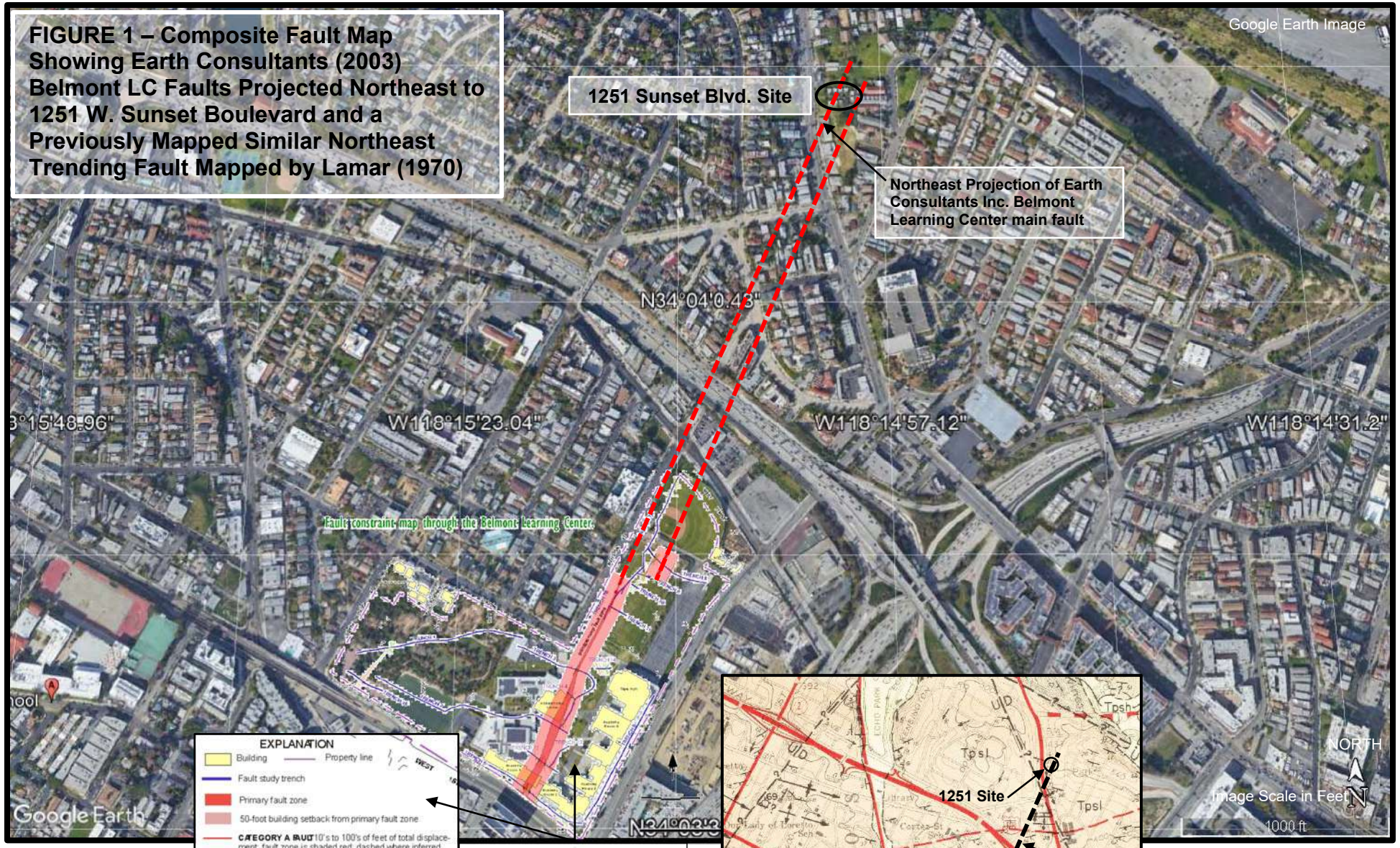
Geotechnologies, Inc., 2014, Response to Soils Report Correction Letter, Proposed Apartment Complex, 1185 West Sunset Boulevard, Los Angeles, California, dated May 22, 2014.

Lamar, D. L. 1970, Geology of the Elysian Park-Repetto Hills Area, Los Angeles County, California, Geologic Map 1:24,000.

FIGURES (SEE ATTACHED BELOW)

FIGURE 1 – Composite Fault Map Showing Earth Consultants (2003) Belmont LC Faults Projected Northeast to 1251 W. Sunset Boulevard and a Previously Mapped Similar Northeast Trending Fault Mapped by Lamar (1970)

FIGURE 2 – A Portion of the Geotechnologies Inc. (2013) Geology Map, Cross-section D-D', and ZIMAS Cadastral Map with Five-Foot Contours



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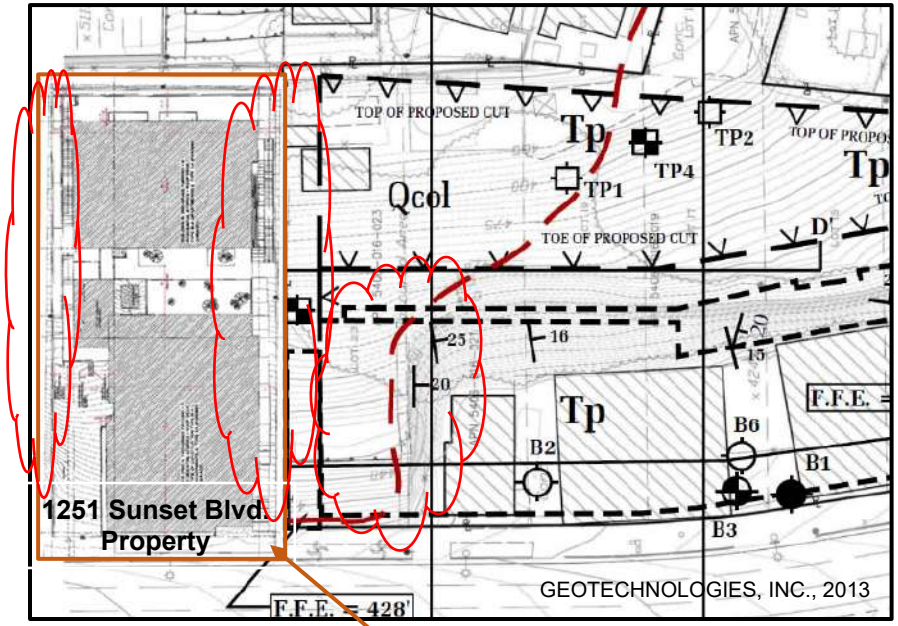


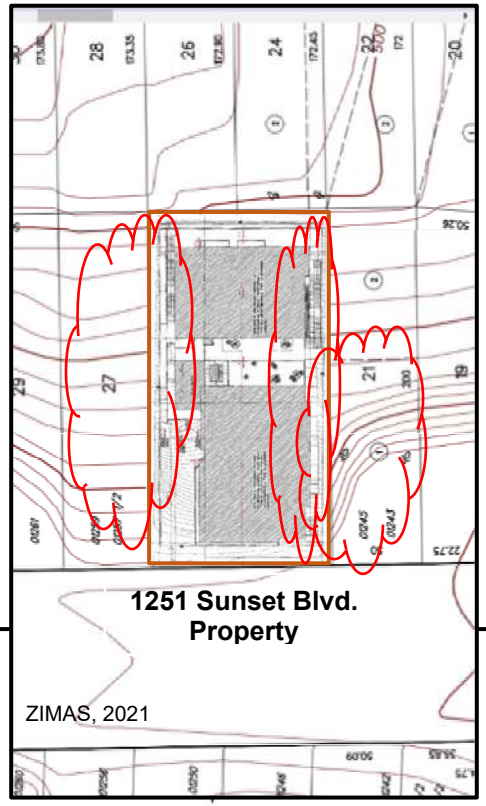
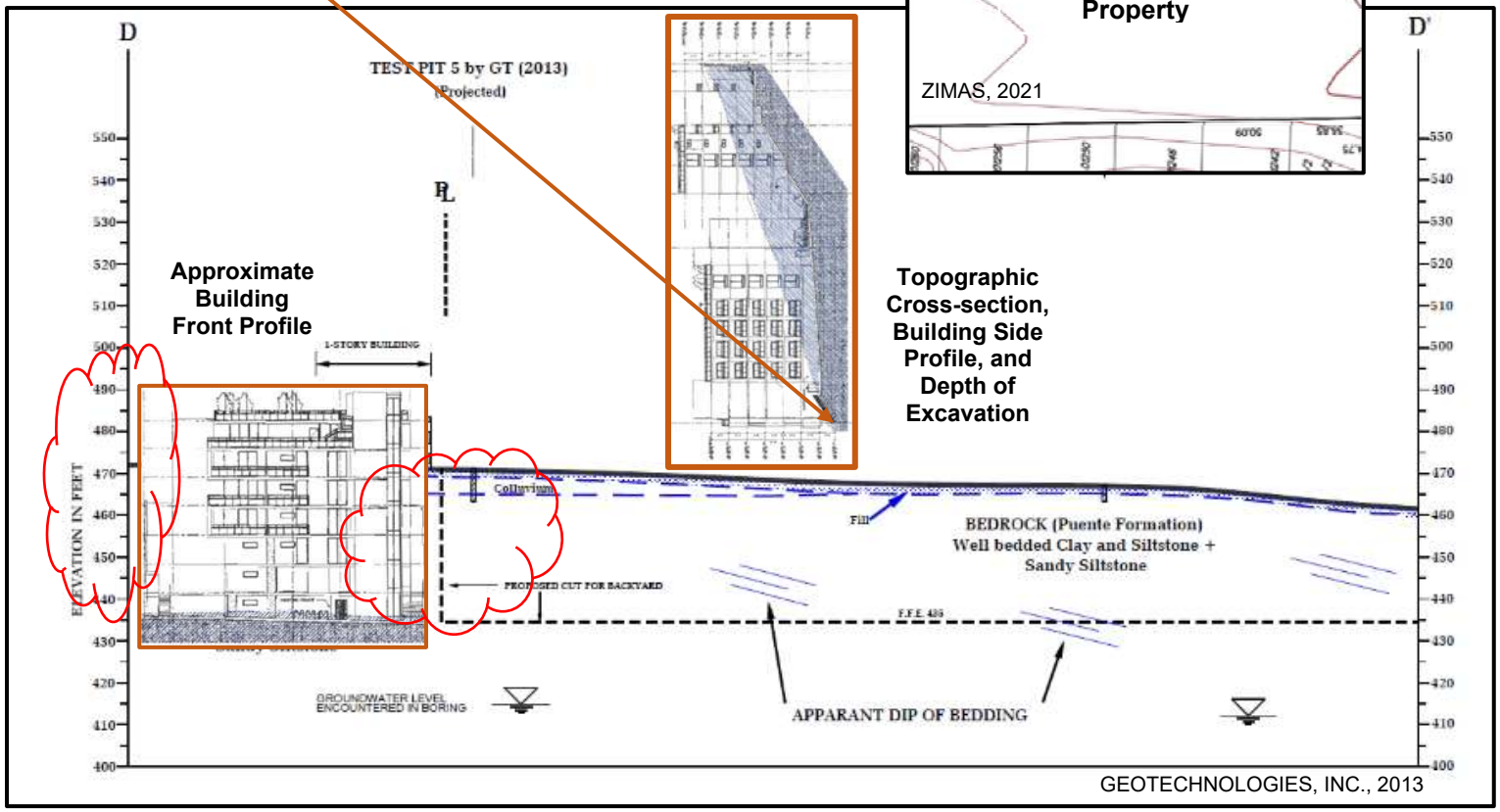


FIGURE 2 – A Portion of the Geotechnologies Inc. (2013) Geology Map, Cross-section D-D', Proposed Building Profiles, ZIMAS Cadastral Map with Five-Foot Contours

Proposed Building Footprint



Areas of Potentially Unstable Permanent and Temporary Slopes Due to Out-of-Slope Bedding

EXHIBIT C

The Human Footprint and the Last of the Wild

ERIC W. SANDERSON, MALANDING JAITEH, MARC A. LEVY, KENT H. REDFORD, ANTOINETTE V. WANNEBO, AND GILLIAN WOOLMER

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In Genesis, God blesses human beings and bids us to take dominion over the fish in the sea, the birds in the air, and every other living thing. We are entreated to be fruitful and multiply, to fill the earth, and subdue it (Gen. 1:28). The bad news, and the good news, is that we have almost succeeded.

There is little debate in scientific circles about the importance of human influence on ecosystems. According to scientists' reports, we appropriate over 40% of the net primary productivity (the green material) produced on Earth each year (Vitousek et al. 1986, Rojstaczer et al. 2001). We consume 35% of the productivity of the oceanic shelf (Pauly and Christensen 1995), and we use 60% of freshwater run-off (Postel et al. 1996). The unprecedented escalation in both human population and consumption in the 20th century has resulted in environmental crises never before encountered in the history of humankind and the world (McNeill 2000). E. O. Wilson (2002) claims it would now take four Earths to meet the consumption demands of the current human population, if every human consumed at the level of the average US inhabitant. The influence of human beings on the planet has become so pervasive that it is hard to find adults in any country who have not seen the environment around them reduced in natural values during their lifetimes—woodlots converted to agriculture, agricultural lands converted to suburban development, suburban development converted to urban areas. The cumulative effect of these many local changes is the global phenomenon of human influence on nature, a new geological epoch some call the "anthropocene" (Steffen and Tyson 2001). Human influence is arguably the most important factor affecting life of all kinds in today's world (Lande 1998, Terborgh 1999, Pimm 2001, UNEP 2001).

Yet despite the broad consensus among biologists about the importance of human influence on nature, this phenomenon and its implications are not fully appreciated by the larger human community, which does not recognize them in its economic systems (Hall et al. 2001) or in most of its political decisions (Soulé and Terborgh 1999, Chapin et al. 2000). In part, this lack of appreciation may be due to scientists' propensity to express themselves in terms like "appropriation of net primary productivity" or "exponential population growth," abstractions that require some training to understand. It may be due to historical assumptions about and habits inherited from times when human beings, as a group, had dramatically less influence on the biosphere. Now the individual deci-

THE HUMAN FOOTPRINT IS A GLOBAL MAP OF HUMAN INFLUENCE ON THE LAND SURFACE, WHICH SUGGESTS THAT HUMAN BEINGS ARE STEWARDS OF NATURE, WHETHER WE LIKE IT OR NOT

Eric W. Sanderson (e-mail: esanderson@wcs.org) is associate director, and Gillian Woolmer is program manager and GIS analyst, in the Landscape Ecology and Geographic Analysis Program at the Wildlife Conservation Society Institute, 2300 Southern Blvd., Bronx, NY 10460. Kent H. Redford is director of the institute. Malanding Jaiteh is a research associate and GIS specialist, Marc A. Levy is associate director for science applications, and Antoinette V. Wannebo is senior staff associate at the Center for International Earth Science Information Network (CIESIN), Columbia University, 61 Route 9W, Palisades, NY 10964. Sanderson's research interests include applications of landscape ecology to conservation problems and geographical and historical contexts for modern conservation action; he has recently published scientific articles on conservation planning for landscape species and rangewide conservation priorities for the jaguar. Woolmer's research interests include the application of geographic information systems and other technologies for field and broad-based conservation activities. Redford has written extensively about the theory and practice of conservation. Levy, a political scientist with a background in international relations and public policy, conducts research on international environmental governance, sustainability indicators, and environment–security interactions. Jaiteh's research interests include applications of remote sensing and geographic information systems technologies in human–environment interactions, particularly the dynamics of land use and cover change in Africa. Wannebo's research interests include detecting land use and land cover changes using remote sensing. *© 2002 American Institute of Biological Sciences.*

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sions of 6 billion people add up to a global phenomenon in a way unique to our time. What we need is a way to understand this influence that is global in extent and yet easy to grasp—what we need is a map.

Until recently, designing such a map was not possible, because detailed data on human activities at the global scale were unavailable. The fortunate confluence of several factors during the 1990s changed this situation. Rapid advances in earth observation, using satellite technology pioneered by NASA and other space agencies, meant that, for the first time, verifiable global maps of land use and land cover were available (Loveland et al. 2000). The thawing of the cold war and calls for efficiency in government meant that other sources of global geographic data, for example, on roads and railways, were released to the public by the US National Imagery and Mapping Agency (NIMA 1997). Improved reporting of population statistics at subnational levels enabled geographers to create global digital maps of human population density (CIESIN et al. 2000). Finally, advances in geographic information systems (GIS) have provided the integration technology necessary to combine these data in an efficient and reproducible manner. Although the datasets now available are imperfect instruments, they are of sufficient detail and completeness that scientists can map the influence of humans on the entire land's surface.

We call our map of human influence "the human footprint," conscious of its similarity to the ecological footprint, a set of techniques for estimating the amount of land or sea necessary to support the consumption habits of one individual, population, product, activity, or service (Wackernagel and Rees 1996). The human footprint represents in some sense the sum total of ecological footprints of the human population. It expresses that sum not as a single number, however, but as a continuum of human influence stretched across the land surface, revealing through its variation the major pattern of human influence on nature.

Mapping the human footprint

Our technique for mapping the human footprint grows out of a recent tradition of wilderness mapping (McCloskey and Spalding 1989, Lesslie and Malsen 1995, Aplet et al. 2000, Yaroshenko et al. 2001), which focuses on defining human influence through geographic proxies, such as human population density, settlements, roads, and other access points, and includes factors such as the size and remoteness of an area. However, except for the Sierra Club map of wilderness (McCloskey and Spalding 1989) that was created before the widespread use of GIS and incorporated only one of the data types we use here, none of these earlier efforts were made at the global scale.

Advances have been made in understanding human disturbance globally since George Marsh first asked, "To what degree are the processes of nature threatened by human activity?" in his 1864 work, *Man and Nature* (quoted in Hannah et al. 1994; see also Lowdermilk 1953, Thomas 1956, and Bennett 1975). More recent efforts include the human disturbance index (Hannah et al. 1994, 1995), which used digitized maps from Rand-McNally atlases and other sources to classify areas as "human-dominated," "partially disturbed," or "undisturbed"; according to that index, nearly three-quarters of the habitable surface of the planet is disturbed at least in part by human use. The Global Methodology for Mapping Human Impacts on the Biosphere (GLOBIO; UNEP 2001) estimates the amount of disturbance on flora and fauna according to their distance from human infrastructure (e.g., roads, pipelines, settlements). Originally focused on scenarios of historic, current, and future impact in the Arctic region, these analyses have recently been expanded to the global scale (see *www.globio.info* for updates). The human footprint has important parallels to all these efforts, which, though approaching the question using a variety of data sources and methodologies, arrive at largely the same answer.

To map the human footprint, we used four types of data as proxies for human influence: population density, land transformation, accessibility, and electrical power infrastructure. Nine datasets that represent these four data types (table 1) were selected for their coverage, consistency, availability, and relevance, but they provide only an incomplete description of human influence on nature. For example, most of these datasets do not include Antarctica or many small oceanic islands, and thus we had to exclude these areas from our analysis. In addition, we confined our analysis to the terrestrial realm, because a different set of inputs would be required to map human influence in the oceans. Effects of pollution, global warming, increased exposure to ultraviolet radiation, and other global phenomena, although they have important consequences for terrestrial ecosystems, are not included. For this analysis we focused on the direct measures of human infrastructure and population that have the most immediate impact on wildlife and wild lands and for which geographic data were readily available. To combine the nine datasets, we needed to (1) present them in one map projection, using a consistent set of coastal boundaries and regions; (2) express them as overlaying grids at a resolution of 1 square kilometer (km^2); and (3) code each dataset into standardized scores that reflected their estimated contribution to human influence on a scale of 0 to 10 (0 for low human influence, 10 for high).

These codes were based on published scientific studies and consultation with a range of biologists, social scientists, and conservationists, as summarized below.

Human population density. The number of people in a given area is frequently cited as a primary cause of declines in species and ecosystems (Cincotta and Engelman 2000), with higher human densities leading to higher levels of influence on nature. A recent study by Brashares and colleagues (2001) showed that 98% of the variation in extinction rates in national parks in Ghana over a 30-year period could be explained by the size of the park and by the number of people living within 50 km of it—the higher the density and the smaller the park, the higher the extinction rate. Others have

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Table 1. Geographic datasets used to map the human footprint.

Dataset type	Dataset name	Year	Sources	Reference
Population density	Gridded Population of the World	1995	CIESIN	CIESIN 2000
Land transformation	Global Land Use/Land Cover version 2	1992–1993	USGS/UNL/JRC	Loveland et al. 2000
	Vector Map Level 0 Built-Up Centers	1960s–1990s	NIMA	NIMA 1997
	Vector Map Level 0 Population Settlements	1960s–1990s	NIMA	
	Vector Map Level 0 Roads and Railways	1960s–1990s	NIMA	
Access	Vector Map Level 0 Roads and Railways	1960s–1990s	NIMA	NIMA 1997
	Vector Map Level 0 Coastline			
	Vector Map Level 0 Rivers (major rivers defined as rivers represented by continuous polygons to the sea)			
Electrical power infrastructure	Defense Meteorological Satellite Program, Stable Lights	1994–1995	NOAA/NGDC	Elvidge et al. 1997a
Biome normalization	Terrestrial Biomes	2001	WWF	Olson et al. 2001
	Terrestrial Biogeographic Realms	2001	WWF	

CIESIN, Center for International Earth Science Information Network, Columbia University; JRC, Joint Research Centre of the European Commission; NGDC, National Geophysical Data Center; NIMA, National Imagery and Mapping Agency; NOAA, National Oceanic and Atmospheric Administration; UNL, University of Nebraska, Lincoln; USGS, US Geological Survey; WWF, World Wildlife Fund for Nature, United States

Note: Although the Vector Map Level 0, ed. 3, datasets were published in 1997, the datasets on which they are based are derived from Defense Mapping Agency Operational Navigational Charts developed from the mid-1960s through the early 1990s.

found similar results for national parks in the western United States and small reserves across Africa (Parks and Harcourt 2002, Harcourt et al. 2001, respectively). Robinson and Bennett (2000) note that, in terms of sustainable hunting levels, the land's carrying capacity for people who depend exclusively on game meat will not greatly exceed one person per km^2, even under the most productive circumstances. Simple mathematics suggests that the greater the number of people, the more resources that will be required from the land, as mediated by their consumption rate (Malthus 1798, Wackernagel and Rees 1996).

Beyond this general understanding, there is little guidance in the literature about how human influence exactly scales with human population density (Forester and Machlis 1996). The consequences of interactions between human population density and the environment depend on the nature of the interaction and the particular species, ecosystems, or processes in question. In this study, we used a continuum approach, in which human influence scores for densities between 0 and 10 persons per km^2 increased linearly from 0 to 10 and the score above 10 persons per km^2 was held constant at 10. We assume that human influence attributable solely to human population density reaches an asymptote at some level, though at what density that influence evens out is uncertain; we chose 10 persons per km^2 as an estimate.

Land transformation. Called the single greatest threat to biological diversity, land transformation has resulted in loss and fragmentation of habitat in many different ecosystem types (Vitousek 1997). Moreover, fragmentation often facilitates additional negative consequences to species and ecosystems beyond the simple loss of habitat, in concert with other processes and over time (Crooks and Soulé 1999, Laurance and Cochrane 2001). Human beings transform land to build settlements, grow food, and produce other economic goods (e.g., Geist and Lambin 2002); different land uses, however, differ in the extent to which they modify ecosystem processes and affect the quality of habitat for different species (Goudie 1986, Forman 1995). Growth of agriculture over the last 30 years has led to large changes in worldwide rates of nitrogen fixation and phosphorus accumulation in soils and water and increased demands on fresh water for irrigation (Tilman et al. 2001).

We assigned the maximum score (10) to built-up environments; lower scores (6, 7, or 8, depending on level of input) to agricultural land cover; and lower scores still (4) to mixed-use cover. Other types of land use, notably extensive grazing lands in arid areas, are difficult to map and are most likely underestimated in our analysis. We assigned a value of 0 to all other land cover types—forests, grasslands, and Mediterranean ecosystems, for example—although those cover types are subject to various kinds of human uses.

Land transformation also includes the direct effects of roads and railways on species and ecosystems. Not all species and ecosystems are equally affected by roads, but overall the presence of roads is highly correlated with changes in species composition, including increases in nonnative invasive species, decreased native species populations through direct and in-

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direct mortality, and modification of hydrologic and geomorphic processes that shape aquatic and riparian systems (Trombulak and Frissell 2000). Lalo (1987) estimated that 1 million vertebrates a day are killed on roads in the United States. Forman and Deblinger (2000) estimated that the effects of American roads extend over a band approximately 600 meters (m) wide. The nominal spatial accuracy of all of the NIMA datasets (table 1) is 2 km. Therefore, we assigned a score (8) for the direct effect of roads and railways within a 2 km buffer to ensure that we captured the actual location of the road as mapped, although we may be overestimating the spatial extent of influence. While we recognized that road influence depends on the type of road and the amount of traffic passing along it, we were unable to include these factors in our analysis because of the imprecision of the datasets. The effect of overlapping influence from multiple roads on the same location was not included.

We also used the independently derived NIMA datasets on settlements (represented by points with 2 km buffers) and built-up areas. The settlement data include a large variety of settlement types, such as camps, buildings, and monuments, but the vast majority of features are of unknown type. We assigned each point a score of 8. The built-up areas, which typically represent the largest cities as polygons in the NIMA database, were assigned a score of 10.

Human access. Roads, major rivers, and coastlines provide opportunities for hunting and extraction of other resources, pollution and waste disposal, and disruption of natural systems, as well as social and economic gain (Gucinski et al. 2001). As a result, designating areas of remoteness is a common element of many wilderness-mapping exercises (e.g., Lesslie and Malsen 1995, Aplet et al. 2000). Hunting of wildlife no longer supplies a significant source of food in the western world, but it does in most of the rest of the world. Such hunting, with its associated disruption of ecosystems, is of major concern (Robinson and Bennett 2000), because it could result in some forests ecosystems being "emptied" by overhunting (Redford 1992). In tropical ecosystems, access from rivers and the coast may be more important than access from roads (Peres and Terborgh 1995).

To measure the area affected by access, we estimated the distance a person could walk in one day in a difficult-to-traverse ecosystem (e.g., moist tropical forests) as 15 km (see, e.g., Wilkie et al. 2000). We acknowledge, however, that this approach oversimplifies the complex relationship between human beings and roads, a relationship that varies by ecosystem type and cultural context. All areas within 2 to 15 km of a road, major river, or coast were assigned a modest human influence score (4) that reflects intermittent use. Major rivers were defined roughly as those that reach the sea and are wide enough

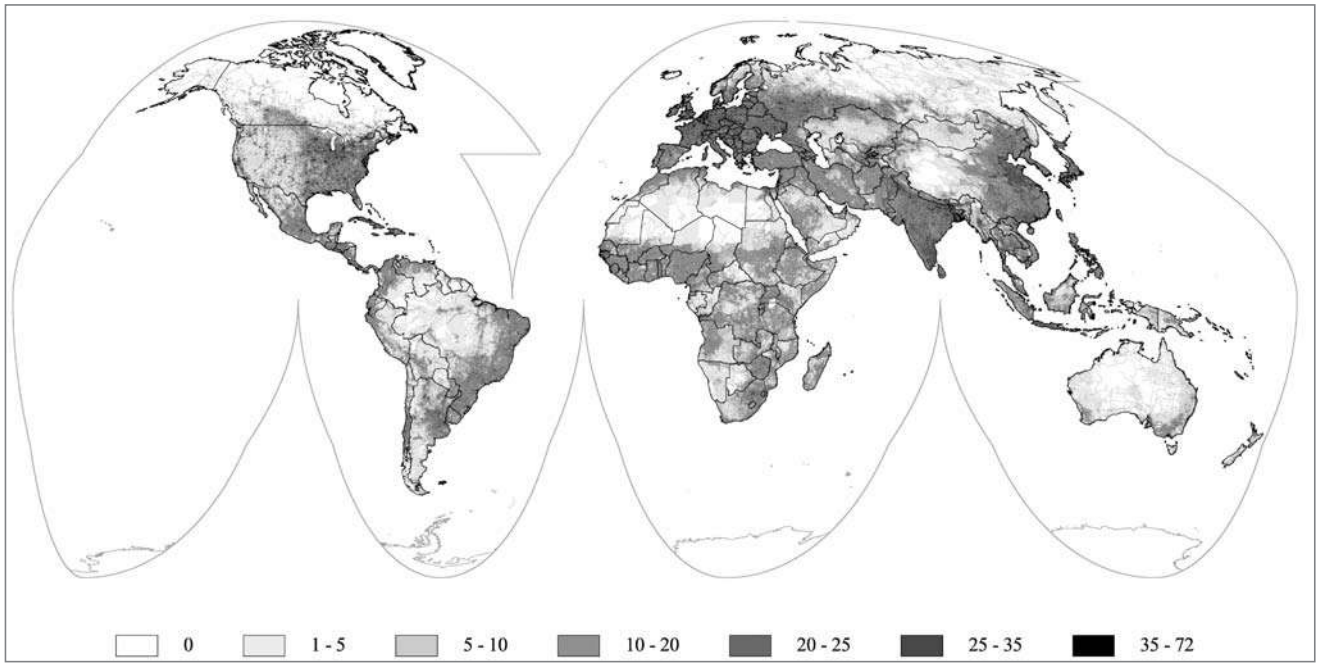

Figure 1. The human influence index. Scores range from 0 to a maximum of 72; higher scores indicate greater human influence, lower scores less human influence. Analysis indicates that 83% of the land surface is influenced by one or more of the following factors: human population density greater than one person per square kilometer (km^2); agricultural land use; built-up areas or settlements; access within 15 km of a road, major river, or the coastline; and nighttime light bright enough to be detected by satellite sensor. Almost 98% of the areas where rice, wheat, or maize can be grown (FAO 2000) is influenced by one or more of these factors. The analysis excludes Antarctica and most oceanic islands, and national boundaries are not authoritative.

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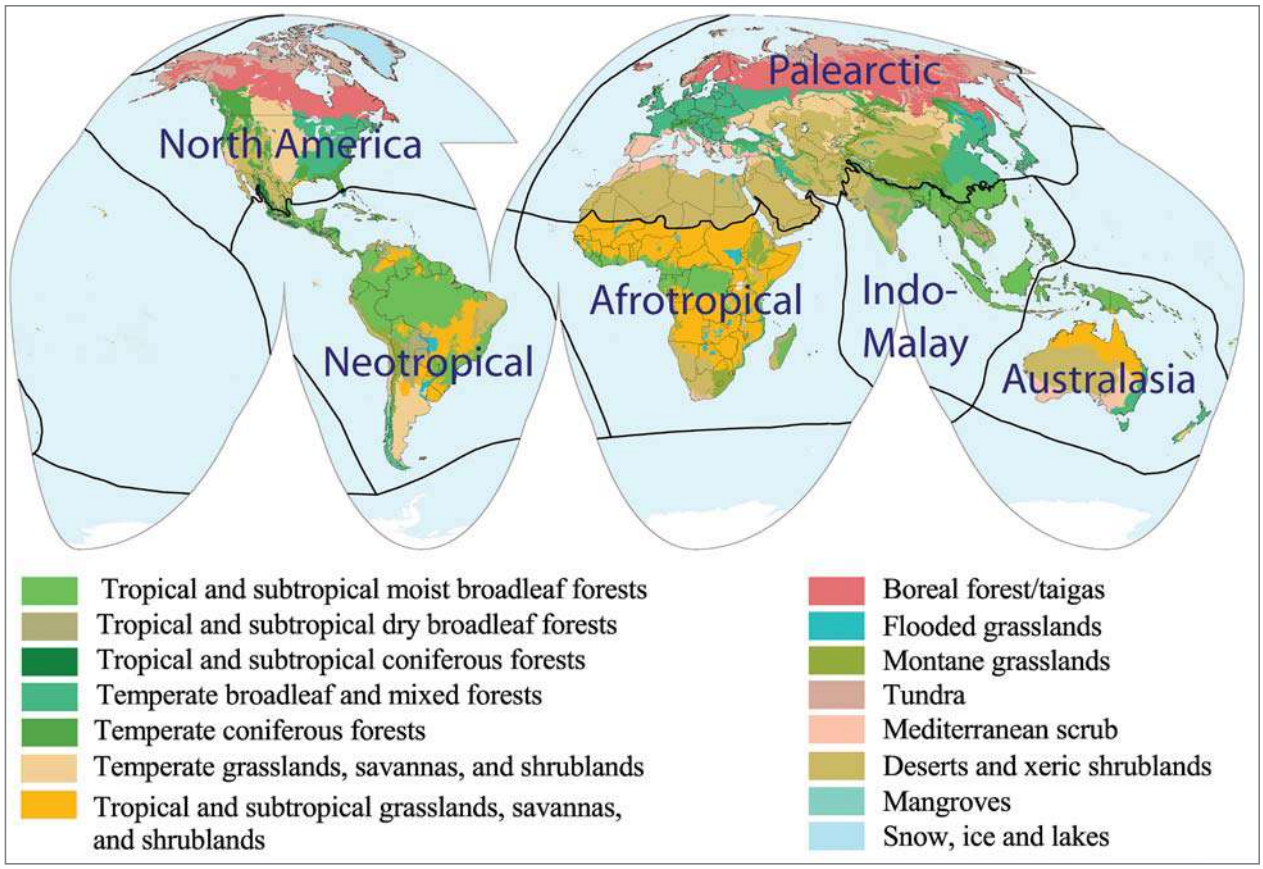

Figure 2. Biomes and biogeographic realms that are used to normalize human influence (Olson et al. 2001). Figure used with permission from World Wildlife Fund–United States.

to be recorded as polygons in the NIMA database, although this definition most likely underestimates the extent of access along rivers, since any river wide enough to float a dugout canoe is a potential access point. We did not include the effects of waterfalls or dams, which limit access upriver, because data were inadequate. Thus, access along some waterways may be overestimated.

Power infrastructure. Many of the dramatic changes in human influence that are due to land use change and access during the 20th century have literally been fueled by fossil energy. Before the industrial revolution, the human capacity to modify the environment was limited by human and animal muscle power, what McNeill (2000) called the "somatic energy regime." Today one human being with a bulldozer can apply the power of 300 horses to modify the environment. Electrical power provides an excellent estimate of the technological development of a local area (Elvidge et al. 1997a) and the use of fossil fuels. In the United States, where electrical power is available nearly everywhere, the lights visible at night from satellites provide a proxy of population distribution and have been correlated with human settlements (Sutton et al. 1997, Elvidge et al. 1997b). We assigned a score of 10 to areas that have lights visible more than 89% of nights, 8 to areas with lights visible 40% to 88% of nights, 4 to areas with lights visible less than 40% of nights, and 0 to areas where no lights were visible.

Summing the scores. We summed the human influence scores for each of the nine datasets to create the human influence index (HII) on the land's surface (figure 1). Overall, 83% of the land's surface, and 98% of the area where it is possible to grow rice, wheat, or maize (FAO 2000), is directly influenced by human beings (HII > 0). The theoretical maximum (72) is reached in only one area, Brownsville, Texas, USA, but the top 10% of the highest scoring areas looks like a list of the world's largest cities: New York, Mexico City, Calcutta, Beijing, Durban, São Paulo, London, and so on. The minimum score (0) is found in large tracts of land in the boreal forests of Canada and Russia, in the desert regions of Africa and Central Australia, in the Arctic tundra, and in the Amazon Basin. The majority of the world (about 60%), however, lies along the continuum between these two extremes, in areas of moderate but variable human influence.

The human influence index, like the GLOBIO methodology or the human disturbance index, treats the land surface as if it were a blank slate on which human influence is written, but we know this is not the case. The distribution of major ecosystem types and the human histories of different regions modify the biological outcomes of human influence (cf.

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Figure 3. The human footprint, a quantitative evaluation of human influence on the land surface, based on geographic data describing human population density, land transformation, access, and electrical power infrastructure, and normalized to reflect the continuum of human influence across each terrestrial biome defined within biogeographic realms. Further views and additional information are available at "Atlas of the Human Footprint" Web site, www.wcs.org/humanfootprint. *Data are available at* www.ciesin.columbia.edu/wild_areas/. *National boundaries are not authoritative.*

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Chapin et al. 2000). For example, an absolute score of 25 in the mixed broadleaf forests of North America might have a different effect, and definitely has a different biological context, than the same score in the rain forests of the African tropics. Because we were interested in the interaction between human influence and the natural environment, we normalized human influence scores within large, regionally defined biomes, which were differentiated within still larger biogeographic realms (e.g., Palearctic, Indo-Malay, Neotropic), in accordance with the geographic definitions provided by the World Wildlife Fund–US Conservation Science Program (figure 2; Olson et al. 2001). We assigned a revised score of 0 to the grid cell with minimum HII value in each biome in each realm and a score of 100 to the cell with maximum value, stretching intermediate values linearly between these extremes (table 2, pp. 901, 902).

The result is the human footprint (figure 3). The human footprint expresses as a percentage the relative human influence in every biome on the land's surface. A score of 1 in moist tropical forests in Africa indicates that that grid cell is part of the 1% least influenced or "wildest" area in its biome, the same as a score of 1 in North American broadleaf forest (although the absolute amount of influence in those two places may be quite different). In fact, there is considerable variation in levels of both overall and mean human influence between biomes (table 2). Examining the human footprint on a larger scale shows the patterns of roads, settlements, land uses, and population density for a particular area—the geography of human influence. For example, on a map of the northeastern United States (figure 4), urbanization in the coastal region is clearly visible, as are major highway corridors along the shore and up the Hudson River and Connecticut River valleys. Relatively wilder areas appear in the Catskills, Adirondacks, and Green Mountains.

We propose that this geography of human influence is roughly the inverse of the geography of natural processes and patterns in the region. Given what we know about the effects of the input factors on nature, we expect that where human influence is highest, ecosystems will be most modified and species under the most pressure from human activity. Where the human footprint values are lower, we expect more intact and functional natural communities. The exact consequences of human influence in any given location are complicated, however, and depend on the history of the place, the types of the current influence, and the parts of nature that we are concerned with (Redford and Richter 1999). We know that some aspects of nature survive, and even thrive, in the midst of our cities, while even in the wildest places, human influence frequently has reduced or is reducing natural values. Yet it is in these wildest places that the greatest freedom and opportunity to conserve the full range of nature still exists.

Finding the last of the wild

It follows from mapping the human footprint that it is also possible to map the least influenced, or "wildest," areas in each biome. We searched through the human footprint to find the "10% wildest areas" in each biome in each realm around the world (the biomes that fell within the 10% cutoff on the HII are listed in table 2). From this set of wildest areas, we selected the 10 largest contiguous areas as the "last of the wild" (figure 5), because such large, intact tracts of relatively undisturbed ecosystems are particularly important for conserving biological diversity (Newmark 1987, Grumbine 1990). Some of the areas defined as the last of the wild are well over 100,000 km^2 in some biomes; in other biomes, we could not find even 10 areas larger than 5 km^2. The size of areas depends on the spatial pattern of human influence above the 10% level; in most biomes, however, roads or patterns of settlement are sufficient to divide one wild area from another. The proportion of area represented by the last of the wild varies dramatically among biomes, depending on the statistical distribution of human influence. Thus, over 67% of the area in the North American tundra is captured as last of the wild, while the 10% wildest area of the Palearctic tropical and subtropical moist broadleaf forests (all in China) encompasses less than 0.03% of that biome.

In total, we selected 568 last-of-the-wild areas, representing all biomes in all the realms. A complete listing of the last-of-the-wild areas can be found on our Web sites, where we characterize each of these wild areas by population density, road density, biome, and region (Atlas of the Human Footprint: *www.wcs.org/humanfootprint;* geographic datasets: *www.ciesin.columbia.edu/wild_ areas/)*. Many of these wild areas contain existing protected areas, but many do not, just as some contain roads and settlements, while others do not. The list of last-of-the-wild areas is a guide to opportunities for effective conservation—these are the places where we might conserve the widest range of biodiversity with a minimum of conflict. They are not and should not be interpreted as a self-contained prescription for complete nature conservation. For example, in the Afrotropical realm, all 10 of the last-of-the-wild areas in the tropical and subtropical moist broadleaf forests biome fall in Central Africa (figure 6). Other parts of the African moist broadleaf forests, in West Africa or Madagascar, are also important for conservation, but their conservation takes place in the context of higher levels of human influence.

There are many ways of using the human footprint to define areas of interest for conservation, depending on the desired conservation objectives. Although area size is often important, for some applications, it may be useful to identify the wildest areas in each biome, regardless of size, for example, the wildest 1% of areas ("seeds of wildness"). Others might use the human footprint to find the areas facing the greatest threat, although those areas may already have lost much of what made them biologically distinct. Whether defining "seeds" or the "last of the wild" or measuring threats, the human footprint provides a flexible tool for identifying areas at different points along the human influence continuum.

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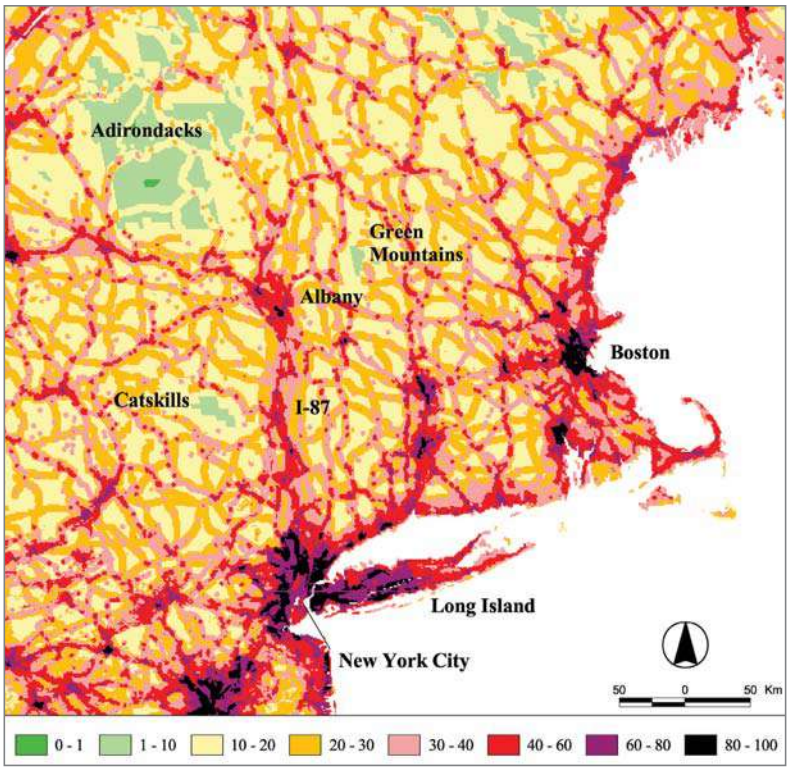

Figure 4. The "human footprint" in the northeastern United States.

Interpreting the human footprint and the last of the wild

The measures of human influence used in this study have many shortcomings that the reader needs to be cognizant of when interpreting the results. First, it is important to acknowledge that although population density, land use changes, access to roads and rivers, and lights visible at night, for example, have been and continue to be drivers of the human impact on nature, drivers are not inevitably harmful. The human footprint does not measure impact per se; rather, it suggests areas of influence where humans have more or less responsibility for biological outcomes. Thoughtful practices and careful planning can mitigate the human influence on ecosystems, as conservation biology and restoration ecology have shown (Stevens 1995). In fact, one of the more interesting uses of the human footprint may be to identify places where sensitive species thrive despite high levels of human influence and determine which human behaviors enable coexistence.

Second, even with modern mapping tools, tremendous effort and expense are required to develop the input datasets used here—in fact, many of these data were developed for the first time only in the 1990s and only through large, government-funded projects. As a result, the datasets tend to lag behind the patterns they seek to depict: growing populations, new road construction, and clearing of new land for human uses. Similarly, the methods used to develop the datasets have shortcomings that result in imperfect representations—underestimates of the amount of grazing lands or insufficient detail about the kinds of settlements or the locations of roads, for instance—that also tend to cloud our view of the extent and severity of human influence. Moreover, there are simply mistakes in these global datasets: Chunks of roads are missing, rivers are more (or less) accessible than they appear, population densities vary unusually across national boundaries, agricultural areas are inaccurately mapped, and so on. Because of these problems, the reader should take care in drawing conclusions from the human footprint for local areas, while not losing sight of the global pattern and its significance.

Finally, our ability to interpret patterns of human influence that are based on geographic features is constrained by the complexities of human interactions with nature and our limited understanding of them. For example, we know that the distance people travel from roads and rivers is less in the temperate zone than in the tropics and that per capita consumption in the developed world results in impacts not just locally, but across the globe. Yet we don't know enough about either of these to assess them globally in a consistent manner. We make no strong claims about any of our coding systems, except to suggest that understanding how surrogate measures quantitatively translate into impacts, or how they should be weighted against each other, is an important area of research. As Rojstaczer and colleagues (2002) recently pointed out, our understanding of the global environmental impact of human beings is in its infancy, and therefore all measures should be considered cautiously. However, we also need to be aware that, though we don't understand everything about human influence on nature, we understand enough to be concerned.

In the near term, one avenue for refining our understanding of the human footprint is to study human influence at regional, national, and local levels. By restricting the area of interest, scientists can use more accurate and detailed datasets; modify the coding functions to respect regional, cultural, and biological differences; and define normalization criteria in ways appropriate for local conservation and management goals. The methods of defining the human footprint and the last of the wild are general and can be applied locally as well as globally to understand where nature may be most pressed and how that pressure may be released.

Implications for conservation practice

The human footprint and last of the wild should give us all pause as we consider our relationship to nature and the types of conservation efforts that we might pursue in the 21st century. This analysis indicates that conservation today proceeds in the context of dramatic, and in some places overwhelming, human influence. For most ecosystems, the greatest near-term threats are from direct human activities like those measured by the human footprint: transformation of land for agriculture and for suburban and urban development, direct

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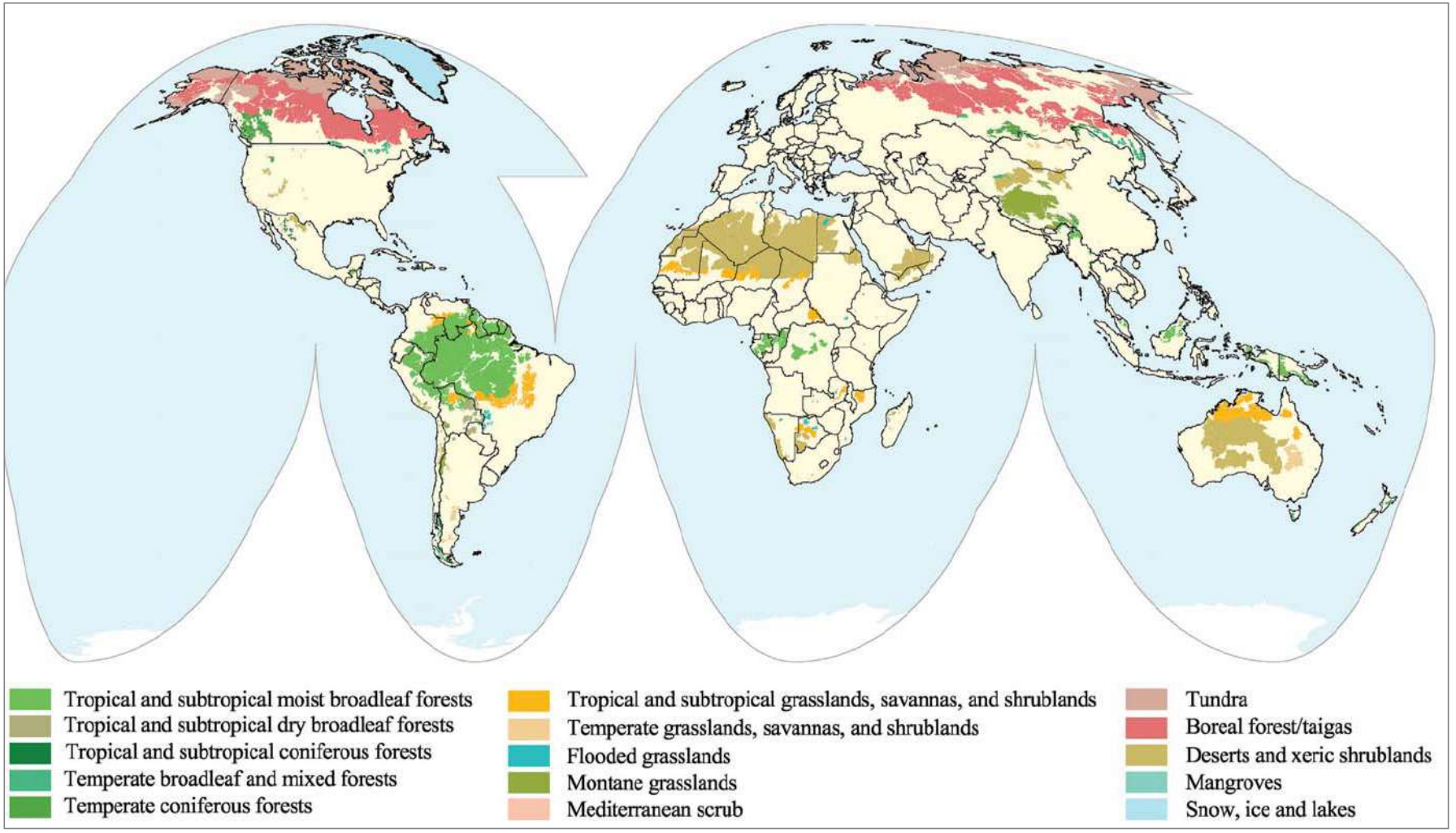

Figure 5. The "last of the wild," showing the ten largest "10% wildest cutoff" areas by biome and realm on the land surface. The full list is available at **www.wcs.org/humanfootprint; *geographic data is available at* www.ciesin.columbia.edu/wild_areas/.**

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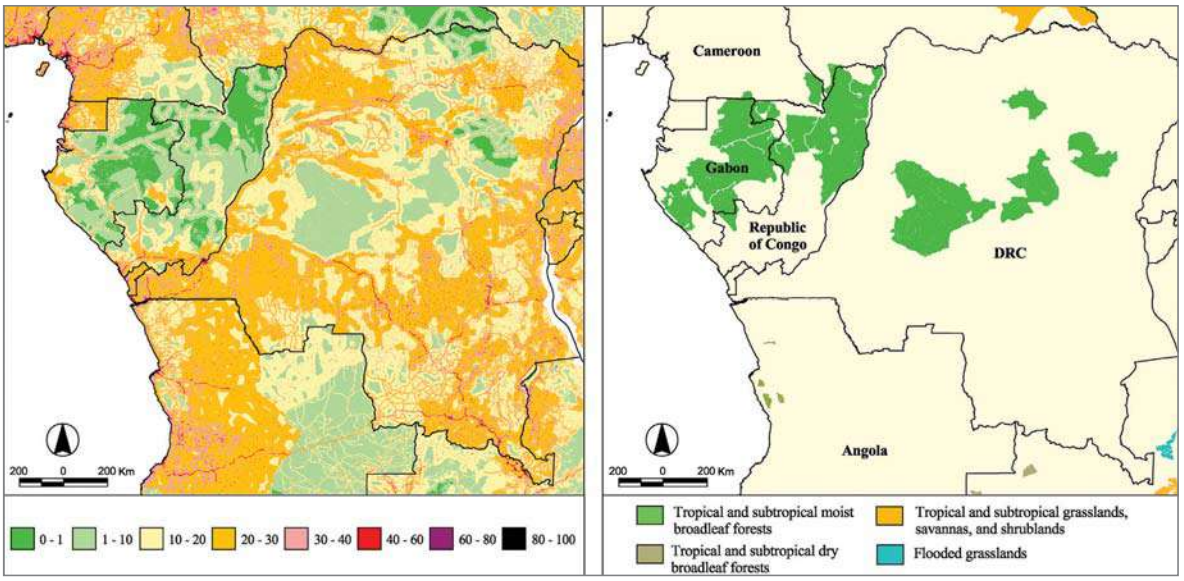

Figure 6. The human footprint and the last of the wild in Central Africa.

effects of roads and indirect effects of the access that roads afford, a power infrastructure that not only pollutes and modifies the climate but also enables extensive land transformation and road construction, and, ultimately, greater consumption of resources by an increasing human population (6 billion now and estimated to be 8 billion by 2020; UN Population Division 1993). Although not a complete catalog of conservation challenges, the human footprint provides an important basis for understanding conservation efforts on a global scale.

The human footprint permits us to organize conservation efforts along an axis of human influence. The kinds of conservation actions that are possible and the types of conservation targets that are available will often depend on the intensity of human influence. Where human influence is high, conservation will be limited in terms of the kinds and numbers of conservation targets available (for example, elk, cougar, and wolves have already been extirpated from the northeast United States). Conservation practice will typically focus on restoring ecosystems, reconnecting habitat fragments, and reintroducing extirpated species in landscapes cumulatively influenced by roads, human land uses, and high human population density. Where human influence is low (e.g., last-of-the-wild areas), a wider range of conservation targets and actions may be possible. These targets and actions could include creating and managing areas of limited human use (i.e., protected areas) and working with relatively smaller populations of local people and their institutions to moderate the outcomes of human influence, while maintaining existing conservation targets, as in Central Africa. Intermediate levels of human influence lend themselves to mixed strategies of preservation, conservation, and restoration, which are most efficiently planned at landscape or regional scales (Noss 1983, Sanderson et al. 2002). The cumulative nature of the human footprint means that, in areas

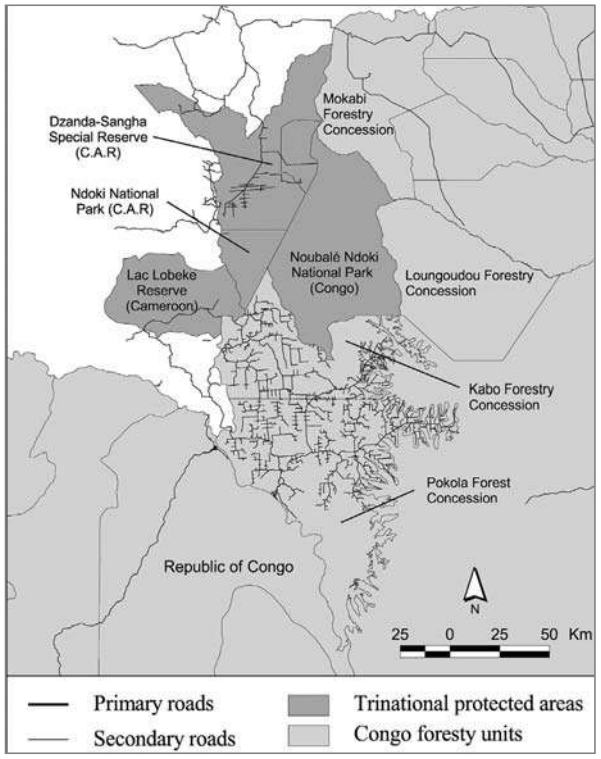

Figure 7. The Ndoki-Likouala Landscape Conservation Area in the trinational region of the Republic of Congo, Cameroon, and Central African Republic (C.A.R.). Primary roads, like those that are used to map the human footprint, are shown as a thick line. Most conservation threats in the region are a result of access along secondary roads, however, which are shown as thin lines and are not currently captured by global datasets. Roads data are courtesy of Frederic Glannaz (2001), Congolese Industrielle des Bois, northern Congo.

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Table 2. Summary of the human influence index scores by realm and biome.

Realm	Biome	Area (km^2)	Minimum	Maximum	Mean	Standard deviation	10% wildest cutoff
Afro-tropical	Tropical and subtropical moist broadleaf forests	3,487,709	0	60	12.42	6.47	6
Afro-tropical	Tropical and subtropical dry broadleaf forests	189,751	1	37	11.11	5.57	5
Afro-tropical	Tropical and subtropical grasslands, savannas, and shrublands	13,983,895	0	60	11.81	5.95	6
Afro-tropical	Temperate grasslands, savannas, and shrublands	25,615	1	36	13.12	5.14	5
Afro-tropical	Flooded grasslands	458,499	0	54	11.59	5.41	5
Afro-tropical	Montane grasslands	863,265	0	56	16.20	5.37	6
Afro-tropical	Mediterranean scrub	93,732	0	60	15.85	7.86	6
Afro-tropical	Deserts and xeric shrublands	2,398,645	0	56	9.07	5.87	6
Afro-tropical	Mangroves	74,585	2	60	20.10	6.30	8
Australia–Asia Pacific	Tropical and subtropical moist broadleaf forests	1,156,438	0	50	10.88	5.83	5
Australia–Asia Pacific	Tropical and subtropical dry broadleaf forests	87,813	4	44	18.19	5.07	8
Australia–Asia Pacific	Temperate broadleaf and mixed forest	733,539	0	64	12.89	7.81	6
Australia–Asia Pacific	Tropical and subtropical grasslands, savannas, and shrublands	2,164,911	0	54	3.71	3.85	5
Australia–Asia Pacific	Temperate grasslands, savannas, and shrublands	629,594	0	50	6.32	6.19	5
Australia–Asia Pacific	Montane grasslands	67,639	0	32	7.03	3.56	3
Australia–Asia Pacific	Mediterranean scrub	803,405	0	64	9.37	6.77	6
Australia–Asia Pacific	Deserts and xeric shrublands	3,572,106	0	64	2.40	3.21	5
Australia–Asia Pacific	Mangroves	26,592	2	32	9.22	3.23	5
Indo–Malay	Tropical and subtropical moist broadleaf forests	5,395,598	0	60	17.60	7.23	6
Indo–Malay	Tropical and subtropical dry broadleaf forests	1,528,071	2	58	19.89	5.99	8
Indo–Malay	Tropical and subtropical coniferous forests	96,028	5	50	17.65	4.84	10
Indo–Malay	Temperate broadleaf and mixed forest	148,763	0	46	13.63	6.67	5
Indo–Malay	Temperate coniferous forests	64,075	0	46	15.47	7.67	5
Indo–Malay	Tropical and subtropical grasslands, savannas, and shrublands	34,681	14	52	22.54	5.84	18
Indo–Malay	Flooded grasslands	27,855	0	48	13.60	6.72	5
Indo–Malay	Montane grasslands	4,337	4	34	17.43	4.90	7
Indo–Malay	Deserts and xeric shrublands	1,085,536	4	56	21.25	6.12	9
Indo–Malay	Mangroves	114,232	4	54	21.11	5.94	9
Neotropical	Tropical and subtropical moist broadleaf forests	9,226,889	0	64	8.04	7.74	6
Neotropical	Tropical and subtropical dry broadleaf forests	1,779,363	0	60	12.63	8.08	6
Neotropical	Tropical and subtropical coniferous forests	321,948	1	56	17.24	5.48	7
Neotropical	Temperate broadleaf and mixed forest	395,543	0	56	9.87	6.82	6
Neotropical	Tropical and subtropical grasslands, savannas, and shrublands	3,410,947	0	64	10.66	6.86	6
Neotropical	Temperate grasslands, savannas, and shrublands	1,636,497	0	64	11.22	7.80	6
Neotropical	Flooded grasslands	323,357	0	64	11.72	7.86	6
Neotropical	Montane grasslands	811,134	0	46	8.47	5.44	5
Neotropical	Mediterranean scrub	148,516	0	64	17.91	8.17	6
Neotropical	Deserts and xeric shrublands	1,168,615	0	64	15.96	6.12	6
Neotropical	Mangroves	121,156	1	62	19.63	7.89	7

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Table 2. (continued)

Realm	Biome	Area (km^2)	Minimum	Maximum	Mean	Standard deviation	10% wildest cutoff
North America	Tropical and subtropical dry broadleaf forests	51,009	0	54	14.71	8.41	6
North America	Tropical and subtropical coniferous forests	288,921	0	46	10.28	5.31	5
North America	Temperate broadleaf and mixed forest	2,838,104	0	68	17.79	9.50	7
North America	Temperate coniferous forests	2,303,350	0	68	10.28	8.77	7
North America	Boreal forests and taigas	5,091,934	0	60	2.07	3.89	6
North America	Tropical and subtropical grasslands, savannas, and shrublands	80,595	0	72	21.86	9.73	7
North America	Temperate grasslands, savannas, and shrublands	3,092,350	0	68	13.75	8.27	7
North America	Tundra	4,238,074	0	50	1.88	2.58	5
North America	Mediterranean scrub	121,268	0	64	16.93	11.45	6
North America	Deserts and xeric shrublands	2,322,298	0	64	9.55	6.52	6
North America	Mangroves	5,004	5	52	19.20	5.96	10
Palearctic	Tropical and subtropical moist broadleaf forests	509,896	4	52	18.03	4.83	9
Palearctic	Temperate broadleaf and mixed forest	8,663,974	0	68	20.94	7.66	7
Palearctic	Temperate coniferous forests	1,701,438	0	60	11.64	7.89	6
Palearctic	Boreal forests and taigas	9,945,699	0	68	5.13	6.06	7
Palearctic	Temperate grasslands, savannas, and schrublands	4,712,174	0	64	15.13	7.20	6
Palearctic	Flooded grasslands	334,501	0	60	17.13	9.67	6
Palearctic	Montane grasslands	3,373,792	0	46	7.69	6.25	5
Palearctic	Tundra	4,040,179	0	54	2.36	3.71	5
Palearctic	Mediterranean scrub	2,103,829	0	60	17.87	7.22	6
Palearctic	Deserts and xeric shrublands	17,324,845	0	60	6.21	6.20	6

Note: The 10% wildest cutoff score designates last-of-the-wild areas.

with intermediate levels of influence, often one factor of influence (e.g., roads or land use) may predominate and thus conservation measures should be targeted toward that factor. It is possible to imagine conservation strategies mapped out for different parts of the human influence continuum, based on the hypothesis that if human influence increases as it has for the last 100 years, conservation strategies will increasingly shift from preservation to restoration—with the concomitant increases in cost, time, and difficulty—much as they already have in the United States and Europe.

Meanwhile, we need to be careful not to read the maps of the human footprint and the last of the wild too literally. Although there is no doubt that the human footprint expresses an important perspective on the world, it is also true that, in its details, it contains inaccuracies (as noted above), and it is mapped at a scale coarser than most conservation efforts. For example, deep in the Central African forests, the Wildlife Conservation Society (WCS) works with the government of the Republic of Congo to conserve Nouabalé-Ndoki National Park (figure 7). The thicker roads shown on this map are those that appear in the data layer of roads in the human footprint, but it is the finer network of logging roads that most concerns WCS conservationists. Successful conservation of the Nouabalé-Ndoki forests and the animals that live there requires having biological and social scientists on the ground to monitor the real levels of impact, as well as to determine who is influencing the ecology of an area and how to work with them to mitigate the negative consequences of human activity. The human footprint as it exists today is too inexact to inform us much at the scale of site-based conservation action, but it does provide a way of seeing our relationship to the planet that connects local decisions to their worldwide impacts.

Conclusions

The global extent of the human footprint suggests that humans are stewards of nature, whether we like it or not. The long-term impact of human influence, positive or negative, benign or catastrophic, depends on our willingness to shoulder responsibility for our stewardship. Conservation organizations and biological scientists have demonstrated surprising solutions that allow people and wildlife to coexist, if people are willing to apply their natural capacity to modify the environment to enhance natural values, not degrade them, while making their living. An important step in generating the willingness to use human capacity for,

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rather than against, nature is to acknowledge the human footprint.

Part of that acknowledgment is a commitment to conserving the last of the wild—those few places, in all the biomes around the globe, that are relatively less influenced by human beings—before they are gone. In large part, this conservation effort will require legal, enforced limits on human uses of natural areas and the knowledge and capacity to manage well in all of the world's biomes. It will also require a willingness to forgo exhausting the last portions of natural ecosystems for short-term economic gain, because once they are gone, it will be very difficult and expensive to bring them back, if they can be brought back at all. To conserve the last of the wild, we must invest our talent and our resources to reclaim a more balanced relationship with the natural world.

Meanwhile, biological scientists, policymakers, and conservationists need to understand and conserve across the gradient of human influence (Margules and Pressey 2000, Miller and Hobbs 2002). The maps presented here provide a framework for understanding conservation efforts in the context of relative differences in human influence. It is possible to find portions of nature everywhere. Where we live in the New York City metropolitan area, magnificent hawk migrations have returned in the fall, though populations still show the effects of past insults, including "varmint shoots" and DDT. Native species continue to survive in small pockets of forest and salt marsh, despite having to contend with trash and competition from invasive species. The waters of the Hudson River and the harbor are cleaner than they have been in years, thanks to legal protections and conscientious local and upstream communities, but they still lack the abundance of fish and other life that once thrived there. We have some solutions, and nature, fortunately, is often resilient if given half a chance.

But the most important acknowledgment is for human beings, as individuals, institutions, and governments, to choose to moderate their influence in return for a healthier relationship with the natural world. We need to reinterpret the colors of the human footprint, so that red signifies where nature is most nurtured and green where wildness thrives. It is possible, and we join with our colleagues in the scientific community to suggest that it is also necessary, to transform the human footprint and save the last of the wild.

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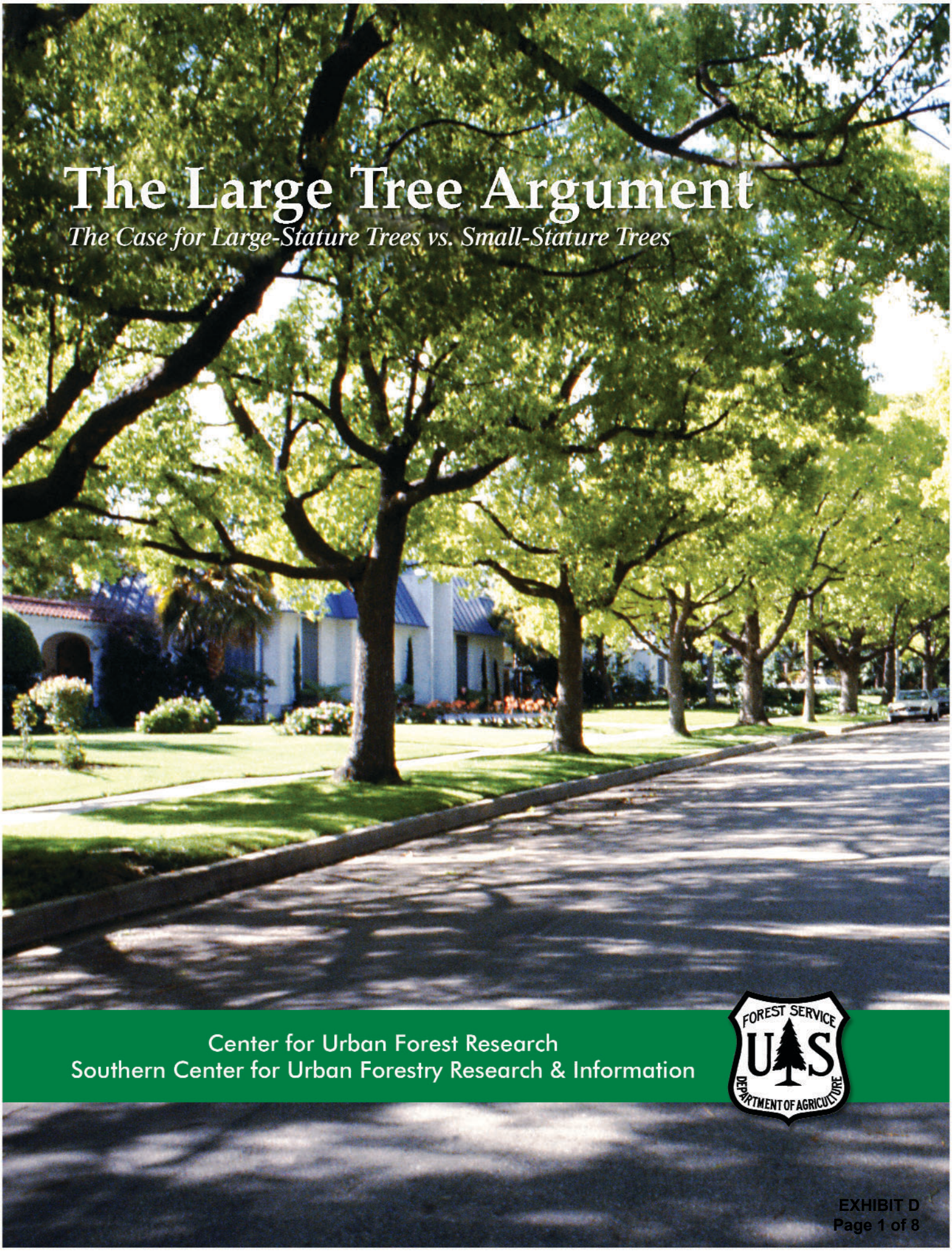


The Large Tree Argument

The Case for Large-Stature Trees vs. Small-Stature Trees

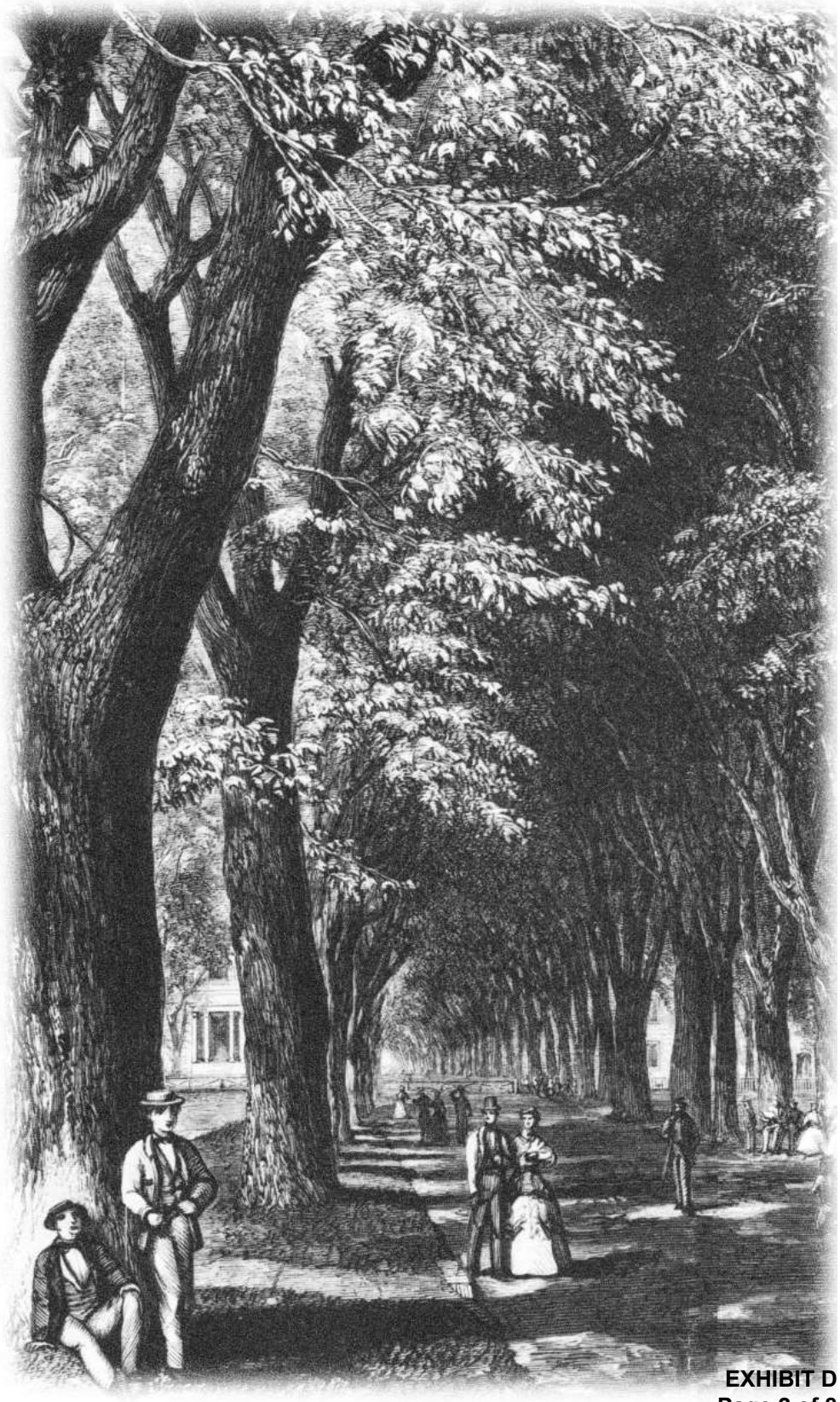
Center for Urban Forest Research
Southern Center for Urban Forestry Research & Information

FOREST SERVICE
US
DEPARTMENT OF AGRICULTURE

Why did we like elm trees so much?

Large stately elm trees once graced many communities throughout the US. But now they are gone. Why were entire communities so disappointed when they lost their elm trees to Dutch elm disease several decades ago?

People had a sense that these large trees were important to them, their family, and their community. And this was long before we quantified the benefits of trees. Now we have scientific evidence for what these people knew decades ago.



USDA US Department of Agriculture

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Center for Urban Forest Research
Pacific Southwest Research Station
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Southern Center for Urban Forestry Research & Information
Southern Research Station
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Large trees pay us back

We now know that, dollar for dollar, large-stature trees (see sidebar definition p.6) deliver big savings and other benefits we can't ignore. Small-stature trees like crape myrtle deliver far fewer benefits. In fact, research at The Center for Urban Forest Research shows that their benefits are up to eight times less.

Compared to a small-stature tree, a strategically located large-stature tree has a bigger impact on conserving energy, mitigating an urban heat island, and cooling a parking lot. They do more to reduce stormwater run off; extend the life of streets; improve local air, soil and water quality; reduce atmospheric carbon dioxide; provide wildlife habitat; increase property values; enhance the attractiveness of a community; and promote human health and well being. And when we use large-stature trees, the bottom-line benefits are multiplied. When it comes to trees, size really does matter.

Don't forget the established "Old Guard"

We can't forget the already-established trees. These older trees provide immediate benefits. The investment that community leaders made 30, 40, 50 years ago is producing dividends today. Dr. McPherson, Director of the Center for Urban Forest Research, points out that "since up-front costs to establish these large-stature trees have already been made, keeping these trees healthy and functional is one of the best investments communities can make."

What do you lose if you don't plant large trees?

Municipal tree programs are dependent on tax-payer supported funding. Therefore, communities must ask themselves, are large-statured trees worth the price to plant and care for? Our research has shown that benefits of large-statured trees far outweigh the costs of caring for them, sometimes as much as eight to one. The big question communities need to ask is: can we afford not to invest in our trees? Are we willing to forego all of these benefits? Or, would we rather make a commitment to provide the best possible care and management of our tree resource and sustain these benefits for future generations.

Costs vs benefits

In most areas of the country, communities can care for their largest trees for as little as $13 per year, per tree. And, each tree returns an average of $65 in energy savings, cleaner air, better managed stormwater, extended life of streets, and higher property values. Even at maturity, small-stature trees do not come close to providing the same magnitude of benefits.

A hypothetical example

A few years ago, the community of Greentree was faced with a budget crisis and decided to save money by downsizing its community forest—planting a majority of small-stature trees like crape myrtle in favor of large-stature trees like ash and even replacing large trees with smaller ones (see below). It made choice X. Unfortunately, this is not an uncommon story in communities today. But the real question is, what did they give up in return, and was downsizing a wise choice?

Table 1: Large trees vs small trees

The city of Greentree chose planting scenario X. By year 20 it was already a $60,000 annual mistake (see discussion above).

		CHOICE X		CHOICE Y	
	Avg. Ann. Benefit Avg. Ann. Cost	# Trees	Total Benefit Total Cost	# Trees	Total Benefit Total Cost
Large Trees	$65.18 $13.72	259	$16,882.00 $3,553.00	1,693	$110,350.00 $23,228.00
Medium Trees	$36.04 $6.87	753	$27,138.00 $5,173.00	753	$27,138.00 $5,173.00
Small Trees	$17.96 $6.23	1,693	$30,406.00 $10,547.00	259	$4,652.00 $1,614.00
Total Trees		2,705		2,705	
Total Benefits Total Costs			$74,426.00 $19,273		$142,140.00 $30,015.00
Annual Net Value to Community			$55,153.00		$112,125.00

Note: Each "tree" represents 259 trees planted.

In this case, the city decided that planting 1693 small-stature trees and only 259 large-stature trees would be a good budget-cutting strategy. Over the short term this may save the city a little money. But over the long term they will have decidedly fewer benefits and a decreased quality of life. City elected officials failed to consider what the city would be giving up over the life of those trees.

Will people want to live, work, recreate, do business, and shop in this community? And will the new trees provide all of the benefits that the residents seek—energy conservation, clean air, clean water, attractive surroundings, and enhanced real estate values. The answer is a resounding NO! The growth of these trees was modeled by The Center for Urban Forest Research over 40 years. By year 20, the decision-makers had already made nearly a $60,000 dollar annual mistake.

Choice Y is clearly the way to go to maximize their return on budget dollars. The model shows that once the trees are mature the community will receive an annual return on investment of nearly $60,000 over choice X. Plus, the community will look quite different in the future and be a healthier and safer place to live.

Is it possible to recreate the past ?

We may never have the arching canopies we once had with the stately elms of a few decades ago. But, we can still achieve large, extensive and functional canopies and reap all the benefits. It will take planting large-stature trees in as many appropriate places as possible while creating the best possible site that maximizes space and allows for adequate exchange of gases and water. And yes, it is possible!

Editors Note

We recognize that on some restricted sites small-stature trees may be the best choice. However, let's not succumb to the limited space argument so easily. We need to continue to fight for more space for trees in every new project and every retrofit. The bigger the tree, the bigger the benefits and, ultimately, the better our quality of life.

The Future Without Large Trees

Cities that are using small-stature trees to reduce costs may achieve some short-term savings, but over the long term, they have destined themselves to a future with fewer and fewer benefits as large-statured trees are replaced with smaller ones.

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What are trees worth?

The value of tree benefits varies widely, but can be as much as $80 to $120 per tree per year for a large tree. Small trees that never get very large, like the crape myrtle, provide not much more than $15 in benefits on average. In some cases they are a net loss to communities after the costs are subtracted. The Center for Urban Forest Research has studied large, medium, and small trees in a number of locations throughout the West and found that, on average, mature large trees deliver an annual net benefit two to six times greater than mature small trees:

Mature tree size
The approximate tree size 40 years after planting.

Relative Size at Maturity:

Small-stature
Less than 25 feet tall and wide with trunk diameters less than 20 inches.

Medium-stature
25 - 40 feet tall and wide with trunk diameters 20 - 30 inches.

Large-stature
Greater than 40 feet tall and wide with trunk diameters commonly over 30 inches.

Large Tree

- Total benefits/year = $55
- Total costs/year = $18
- Net benefits/year = $37
- Life expectancy = 120 years
- Lifetime benefits = $6,600
- Lifetime costs = $2,160
- Value to community = $4,440

Medium Tree

- Total benefits/year = $33
- Total costs/year = $17
- Net benefits/year = $16
- Life expectancy = 60 years
- Lifetime benefits = $1,980
- Lifetime costs = $1,020
- Value to community = $960

Small Tree

- Total benefits/year = $23
- Total costs/year = $14
- Net benefits/year = $9
- Life expectancy = 30 years
- Lifetime benefits = $690
- Lifetime costs = $420
- Value to community = $270

—hypothetical case using data for trees at year 30, projected to life expectancy from McPherson, E.G.; et. al. 2003. Northern mountain and prairie community tree guide: benefits, costs and strategic planting. Center for Urban Forest Research, Pacific Southwest Research Station, USDA Forest Service. 92p.

Fact Sheet: Making the Case for Large Trees

Large-stature trees need to be "marketed" as maximizing urban benefits:

- Cooling the air
- Shading paved surfaces
- Improving air and water quality
- Preventing water runoff and soil erosion
- And enhancing residential and commercial value

Even with these well-documented benefits, the challenges for increasing the number of large trees are consistently related to construction and preservation issues, space and persuading the community. Increasing the number of larger trees requires a combination of strategies that address these obstacles.

Construction and preservation obstacles

Consider both the preservation and planting of large trees in planning and design. Preserving large trees during construction:

- Start early in the process.

  Designate which trees need to be preserved. Larger more mature trees (that are in good condition) provide more value and benefits than smaller ornamental trees.

- Advise construction management of project schedules related to season-specific activities such as root pruning, fertilization, and insect control.

- Educate construction crews and the community about their role in preserving trees:
  - Soil compaction
  - Trunk and branch damage
  - Over or under watering
  - Chemical spills

- Pay careful attention to accidental damage, utility activities, or onsite crews that may impact the root system or soil composition.

- Accommodate utility lines near the critical root zone (CRZ), especially for larger trees by:
  - Tunneling under the tree root mat to install utility lines. This does little damage compared to trenching through the roots.
  - Use a pneumatic excavating tool for excavation work that must happen inside the CRZ. This tool can remove soil around tree roots without harming them.

- At the end of construction, plan for additional care as part of a recovery phase including watering, insect and disease control, and pruning.

- adapted from work by Charlotte King, President, Snowden & King Marketing Communications

Finding space

Accommodating larger trees is an ongoing challenge that is complicated by the competing needs for utility lines and impervious surfaces. Here are a few suggestions to address the issue of space during the planning and design phase:

- Recommend planting large-stature trees as part of transportation corridors whenever possible.
- Tree roots generally stay in the upper 18 inches of soil; therefore, ensure that pipes such as gas, electric, communication and water are installed deeper and use the space above for trees.
- A new publication, "Reducing Infrastructure Damage by Tree Roots: a Compendium of Strategies," clearly outlines ways to install large trees in limited space so they coexist in harmony with hardscape. It is available through the Western Chapter ISA at http://www.wcisa.net.

This fact sheet is provided for you to copy and distribute. Please credit the Center for Urban Forest Research, Pacific Southwest Research Station, USDA Forest Service, Davis, California and the Southern Center for Urban Forestry Research & Information, Southern Research Station, USDA Forest Service, Athens, Georgia. 2004

Persuading the Community

You are the tree expert, and the public is looking to you for guidance and best practices that they can rely on for critical decisions related to budgeting, construction, esthetics, and long-term environmental impact. You also have an opportunity to talk with them about selection, preservation, and critical maintenance of trees, and persuade them that the benefits of larger trees far outweigh the costs:

1. Explain the benefits of the larger trees and point out the obstacles. Discuss ways to mitigate these obstacles as described above in terms of construction, preservation, or space.

2. Play an active role in the construction process to limit the damage done to trees, and identify post-construction tree care. Make sure the community understands the ongoing tree care requirements.

3. Increase your "marketing expertise" in leveraging the value of community partners, media recognition, or historic preservation status. A little recognition combined with community education can make a big difference in changing the commitment to including larger trees in community projects.

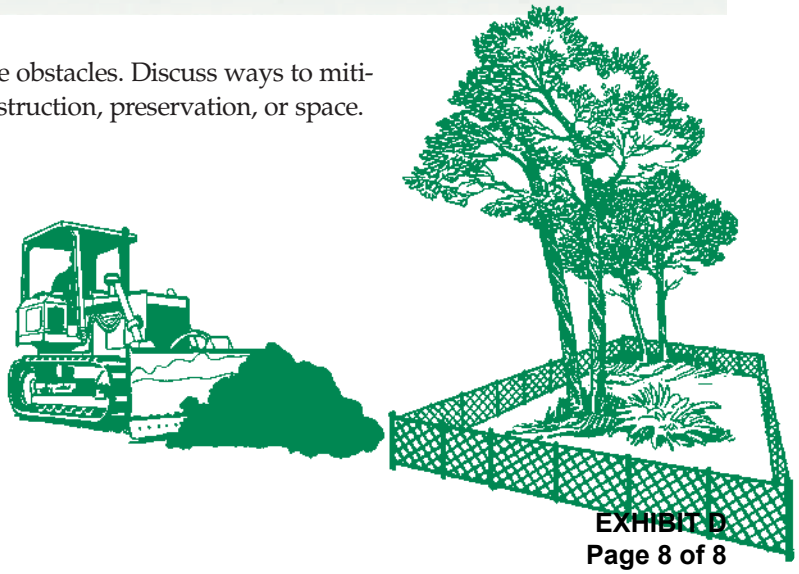

EXHIBIT E

DEPARTMENT OF
CITY PLANNING
200 N. SPRING STREET, ROOM 272
LOS ANGELES, CA 90012-4801

CULTURAL HERITAGE COMMISSION

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VICE PRESIDENT

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http://planning.lacity.org

August 18, 2020

Los Angeles City Council
c/o Office of the City Clerk
City Hall, Room 395
Los Angeles, CA 90012

Attention: PLUM Committee

Dear Honorable Members:

STIRES STAIRCASE BUNGALOW COURT; 1251-1259 WEST SUNSET BOULEVARD; CHC-2020-896-HCM; ENV-2020-897-CE; CD-1

At its meeting of **August 6, 2020**, the Cultural Heritage Commission took the actions below to include the Stires Staircase Bungalow Court in the list of Historic-Cultural Monuments, subject to adoption by the City Council:

1. **Determined** that the proposed designation is categorically exempt from the California Environmental Quality Act (CEQA), pursuant to Article 19, Section 15308, Class 8 and Article 19, Section 15331, Class 31 of the State CEQA Guidelines;
2. **Determined** that the property conforms with the definition of a Monument pursuant to Section 22.171.7 of the Los Angeles Administrative Code;
3. **Recommended** that the City Council consider the Stires Staircase Bungalow Court for inclusion in the list of Historic-Cultural Monuments; and
4. **Adopted** the attached Findings as amended by the Commission.

The Commission vote was as follows:

Moved:	Kennard
Seconded:	Milofsky
Ayes:	Barron
Nays:	Buelna, Kanner

Vote: **3 – 2**

James K. Williams, Commission Executive Assistant II
Cultural Heritage Commission

The Cultural Heritage Commission would appreciate your inclusion of the subject property to the list of Historic-Cultural Monuments.

Time for Council to Act: The Commission action is hereby transmitted to the City Council for consideration. Pursuant to Section 22.171.10(f) of the Los Angeles Administrative Code, the Council may approve or disapprove in whole or in part an application or initiation for a proposed designation of a Monument. The Council shall act in 90-days of the public hearing held before the Commission on the proposed designation. The City Council may unilaterally extend the 90-day time limit to act for a maximum of 15 days for good cause. With written consent of the owner, the time for the City Council to act may be extended by up to an additional 60 days. If the Council does not act on the application or initiation within this specified time limit, the application or initiation to designate a Monument shall be deemed to have been denied.

Enclosure: Amended Findings, Staff Report, Categorical Exemption, Mailing List

STIRES STAIRCASE BUNGALOW COURT
1251-1259 West Sunset Boulevard
CHC-2020-896-HCM
ENV-2020-897-CE

AMENDED FINDINGS

(Amended by the Cultural Heritage Commission on August 6, 2020)

- The Stires Staircase Bungalow Court "exemplifies significant contributions to the broad cultural, economic or social history of the nation, state, city or community" as an example of 1920s working class housing developed adjacent to the Sunset Boulevard streetcar line.

- The Stires Staircase Bungalow Court "is associated with the lives of historic personages important to national, state, city, or local history" as a property owned by Lilly Bennett Baldwin Howard, who became one of the first female bank executives to make her fortune in the banking industry.

- The Stires Staircase Bungalow Court "embodies the distinctive characteristics of a style, type, period, or method of construction" as an excellent example of a hillside bungalow court.

DISCUSSION OF FINDINGS

The Stires Staircase Bungalow Court meets all three of the Historic-Cultural Monument criteria.

The subject property "exemplifies significant contributions to the broad cultural, economic or social history of the nation, state, city or community" as an example of 1920s working class housing developed adjacent to the Sunset Boulevard streetcar line. Throughout the 1920s and 1930s, there was a massive population influx into Los Angeles, resulting in a construction boom and spread of the city in all directions. The subject property was built along the Pacific Electric streetcar line on Sunset Boulevard in response to the need for housing in the area, most likely for employees of the nearby film studios. The streetcar line servicing Sunset Boulevard was in use in the area from 1901 until the late 1940s, and the period of significance for streetcar suburbanization in the city spans from 1888 to 1933, encompassing the 1922 construction of the subject property. The streetcar line played a key role in laying the groundwork for the future growth of the area. At a time when automobiles were ascending as the primary form of transportation, the subject property was designed without driveways, garages, or vehicular access, making the residents dependent on the streetcar for transportation. The subject property represents railroad settlement at the peak of rail access in Los Angeles.

The subject property also "is associated with the lives of historic personages important to national, state, city, or local history" as a property owned by Lilly Bennett Baldwin Howard, who became one of the first female bank executives to make her fortune in the banking industry. Baldwin Howard, wife of Elias Jackson "Lucky" Baldwin, owned the subject property from 1929 until her death in 1938, although it remained in the name of her estate until 1950. Following Lucky Baldwin's death in 1909, Baldwin Howard flourished as her own financial manager, and became a millionaire in her own right by investing in the banking business. During her banking career, she served as President of the Hollywood State Bank and Broadway State Bank; Vice President of the First National Bank of Pasadena, and owner of the Continental Bank (later part of Bank of America). When she passed away her *New York Times* obituary called her a "financial genius," noting that she had "guided the destiny of half a dozen banks."

Additionally, the Stires Staircase Bungalow Court "embodies the distinctive characteristics of a style, type, period, or method of construction" as an excellent example of a hillside bungalow court. By the 1920s, the intense demand for higher density housing led to innovative multi-family property designs that assimilated into the low-density environment that characterized the city. The bungalow court was the earliest iteration of the resulting low-rise, high density courtyard apartment building. However, much of the early development in Los Angeles occurred near the hills surrounding downtown, many courtyard designs, including the subject property, had to adjust themselves to topographical constraints. Featuring two rows of one-story detached residences arranged on either side of an ascending concrete staircase with the primary entrance to each unit opening directly onto the central walkway, the subject property exhibits the characteristics of the downhill U-parti bungalow court typology.

Despite minor interior and exterior alterations, the subject property retains sufficient integrity of location, design, setting, materials, workmanship, feeling, and association to convey its significance.

CALIFORNIA ENVIRONMENTAL QUALITY ACT ("CEQA") FINDINGS

State of California CEQA Guidelines, Article 19, Section 15308, Class 8 "*consists of actions taken by regulatory agencies, as authorized by state or local ordinance, to assure the maintenance, restoration, enhancement, or protection of the environment where the regulatory process involves procedures for protection of the environment.*"

State of California CEQA Guidelines Article 19, Section 15331, Class 31 "*consists of projects limited to maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction of historical resources in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic buildings.*"

The designation of the Stires Staircase Bungalow Court as an Historic-Cultural Monument in accordance with Chapter 9, Article 1, of The City of Los Angeles Administrative Code ("LAAC") will ensure that future construction activities involving the subject property are regulated in accordance with Section 22.171.14 of the LAAC. The purpose of the designation is to prevent significant impacts to a Historic-Cultural Monument through the application of the standards set forth in the LAAC. Without the regulation imposed by way of the pending designation, the historic significance and integrity of the subject property could be lost through incompatible alterations and new construction and the demolition of an irreplaceable historic site/open space. The Secretary of the Interior's Standards for Rehabilitation are expressly incorporated into the LAAC and provide standards concerning the historically appropriate construction activities which will ensure the continued preservation of the subject property.

The City of Los Angeles has determined based on the whole of the administrative record, that substantial evidence supports that the Project is exempt from CEQA pursuant to CEQA Guidelines Section Article 19, Section 15308, Class 8 and Class 31, and none of the exceptions to a categorical exemption pursuant to CEQA Guidelines Section 15300.2 applies. The project was found to be exempt based on the following:

> The use of Categorical Exemption Class 8 in connection with the proposed designation is consistent with the goals of maintaining, restoring, enhancing, and

protecting the environment through the imposition of regulations designed to prevent the degradation of Historic-Cultural Monuments.

The use of Categorical Exemption Class 31 in connection with the proposed designation is consistent with the goals relating to the preservation, rehabilitation, restoration and reconstruction of historic buildings and sites in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties.

Categorical Exemption ENV-2020-897-CE was prepared on August 6, 2020.

EXHIBIT F

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1259 W SUNSET BLVD

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Address/Legal

Site Address	1259 W SUNSET BLVD
Site Address	1257 W SUNSET BLVD
Site Address	1257 1/2 W SUNSET BLVD
ZIP Code	90026
PIN Number	136-5A211 47
Lot/Parcel Area (Calculated)	9,999.9 (sq ft)
Thomas Brothers Grid	PAGE 634 - GRID F1
Assessor Parcel No. (APN)	5406015001
Tract	ANGELENO HEIGHTS
Map Reference	M R 10-63/66
Block	31
Lot	27
Arb (Lot Cut Reference)	None
Map Sheet	136-5A211

Jurisdictional

Planning and Zoning

Assessor

Case Numbers

Citywide/Code Amendment Cases

Additional

Airport Hazard	None
Coastal Zone	None
Farmland	Area Not Mapped
Urban Agriculture Incentive Zone	YES
Very High Fire Hazard Severity Zone	No
Fire District No. 1	No
Flood Zone	Outside Flood Zone
Watercourse	No
Hazardous Waste / Border Zone Properties	No
Methane Hazard Site	Methane Zone
High Wind Velocity Areas	No
Special Grading Area (BOE Basic Grid Map A-13372)	Yes
Wells	None

Seismic Hazards

Economic Development Areas

Housing

Public Safety

EXHIBIT F
Page 1 of 1

DEPARTMENT OF CITY PLANNING

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DIRECTOR'S DETERMINATION
TRANSIT ORIENTED COMMUNITIES AFFORDABLE HOUSING INCENTIVE PROGRAM

August 26, 2021

Applicant/Owner
Aym Investment, LLC
6404 Wilshire Boulevard, Unit 999
Los Angeles, CA 90048

Representative
Andy Simhaee
Simha Engineering, Inc.
1332 South St. Joseph Place
Los Angeles, CA 90025

Case No.	DIR-2018-6634-TOC
CEQA:	ENV-2018-6635-CE
Location:	1251-1259 West Sunset Boulevard
Council District:	1 - Cedillo
Neighborhood Council:	Echo Park
Community Plan Area:	Silver Lake – Echo Park – Elysian Valley
Land Use Designation:	General Commercial
Zone:	C2-1VL
Legal Description:	Lots 25-26, Block 31, Angeleno Heights Tract

Last Day to File an Appeal: September 10, 2021

DETERMINATION – Transit Oriented Communities Affordable Housing Incentive Program

Pursuant to the Los Angeles Municipal Code (LAMC) Section 12.22-A,31, I have reviewed the proposed project and as the designee of the Director of City Planning, I hereby:

1. **Determine** based on the whole of the administrative record, that the project is exempt from the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines, Section 15332, Article 19 (Class 32), and there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies;

2. **Approve with Conditions** a 50% increase in density consistent with the provisions of the Transit Oriented Communities Affordable Housing Incentive Program along with the following three (3) incentives for a Tier 1 project totaling 70 dwelling units, reserving six (6) units for Extremely Low Income (ELI) Household occupancy for a period of 55 years:

   a. **Side Yards.** A 25% reduction in the required side yards;

b. Rear Yard. A 25% reduction in the required rear yard;

c. Height. A height increase of one (1) additional story up to 11 additional feet; and

3. Adopt the attached Findings and Conditions of Approval.

CONDITIONS OF APPROVAL

Pursuant to LAMC Section 12.22-A,31, the following conditions are hereby imposed upon the use of the subject property:

1. **Site Development.** Except as modified herein, the project shall be in substantial conformance with the plans and materials submitted by the applicant, stamped "Exhibit A," and attached to the subject case file. Minor deviations may be allowed in order to comply with the provisions of the LAMC or the project conditions. Changes beyond minor deviations required by other City Departments or the LAMC may not be made without prior review by the Department of City Planning, Expedited Processing Section, and written approval by the Director of City Planning. Each change shall be identified and justified in writing.

2. **Base Incentives.**

   a. **Residential Density**. The project shall be limited to a maximum density of 70 residential dwelling units, including On-site Restricted Affordable Units.

   b. **Floor Area Ratio (FAR)**. The project is permitted to have a maximum FAR of 2.75 to 1 in the C2-1VL Zone.

   c. **Parking.**

      i. **Automotive Parking.** Automobile parking shall be provided consistent with the LAMC Section 12.22-A,31, which permits 0.5 parking space per bedroom for a Tier 1 Project.

      ii. **Bicycle Parking.** Bicycle parking shall be provided consistent with LAMC 12.21-A,16.

      iii. **Adjustment of Parking.** In the event that the number of Restricted Affordable Units should increase or the composition of such units should change (i.e. the number of bedrooms, or the number of units made available to Senior Citizens and/or Disabled Persons), and no other Condition of Approval or incentive is affected, then no modification of this determination shall be necessary, and the number of parking spaces shall be re-calculated by the Department of Building and Safety based upon the ratios set forth pursuant to LAMC Section 12.22-A,25.

      iv. **Unbundling.** Required parking may be sold or rented separately from the units, with the exception of all Restricted Affordable Units which shall include any required parking in the base rent or sales price, as verified by HCIDLA.

3. **Additional Incentives.**

a. **Rear Yard.** The project shall be permitted a 25% reduction in the required side yards.

b. **Side Yards.** The project shall be permitted a 25% reduction in the required rear yard.

c. **Height.** The project shall be permitted a height increase of one (1) additional story up to 11 additional feet.

4. **On-site Restricted Affordable Units.** Prior to issuance of a building permit, the owner shall execute a covenant to the satisfaction of HCIDLA to designate eight (8) percent of the total number of dwelling units for Extremely Low Income Households, as defined by the Los Angeles Housing and Community Investment Department (HCIDLA) and California Government Code Section 65915(c)(2) for sale or rental as determined to be affordable to such households by HCIDLA for a period of 55 years. In the event the applicant reduces the proposed density of the project, the number of required set-aside affordable units may be adjusted, consistent with LAMC Section 12.22-A,31, to the satisfaction of HCIDLA, and in consideration of the project's AB2556 Determination. The applicant will present a copy of the recorded covenant to the Department of City Planning for inclusion in this file. The project shall comply with the Guidelines for the Affordable Housing Incentives Program adopted by the City Planning Commission and with any monitoring requirements established by the HCIDLA. Refer to the Density Bonus Legislation Background section of this determination.

   Housing replacement units required pursuant to AB2556 may be used to satisfy the On-site Restricted Affordable Units provided such units meet the income levels, to the satisfaction of HCIDLA.

5. **On-site Restricted Affordable Units.** Eight (8) percent of the total number of dwelling units, shall be designated for Extremely Low Income Households, as defined by the Los Angeles Housing and Community Investment Department (HCIDLA) and California Government Code Section 65915(c)(2).

6. **Changes in On-site Restricted Units**. Deviations that increase the number of restricted affordable units or that change the composition of units or change parking numbers shall be consistent with the Transit Oriented Communities Guidelines.

7. **Housing Requirements.** Prior to issuance of a building permit, the owner shall execute a covenant to the satisfaction of the Los Angeles Housing and Community Investment Department (HCIDLA) to make eight (8) percent of the total number of dwelling units available to Extremely Low Income Households, for sale or rental as determined to be affordable to such households by HCIDLA for a period of 55 years. In the event the applicant reduces the proposed density of the project, the number of required set-aside affordable units may be adjusted, consistent with the Transit Oriented Communities Guidelines, to the satisfaction of HCIDLA, and in consideration of the project's AB 2556 Determination. Enforcement of the terms of said covenant shall be the responsibility of HCIDLA. The applicant will present a copy of the recorded covenant to the Department of City Planning for inclusion in this file. The project shall comply with the Guidelines for the Affordable Housing Incentives Program adopted by the City Planning Commission and with any monitoring requirements established by the HCIDLA. Refer to the Density Bonus Legislation Background section of this determination.

8. **Housing Replacement.** Prior to issuance of a building permit, the owner shall execute a covenant to the satisfaction of HCIDLA to replace a total of seven (7) dwelling units including: four (4) units restricted to Extremely Low Income Households; two (2) units restricted for Very

Income Households, and one (1) unit restricted to Low Income Households, for sale or rental as determined to be affordable to such households by HCIDLA for a period of 55 years. Enforcement of the terms of said covenant shall be the responsibility of HCIDLA. The applicant will present a copy of the recorded covenant to the Department of City Planning for inclusion in this file. The project shall comply with the Guidelines for the Affordable Housing Incentives Program adopted by the City Planning Commission and with any monitoring requirements established by the HCIDLA. Refer to the Density Bonus Legislation Background section of this determination.

On-site Restricted Affordable Units may be used to satisfy the housing replacement units required pursuant to AB 2556 provided such units meet the income levels, to the satisfaction of HCIDLA.

9. **Design Conformance.**

   a. **Entrance.** Submit enlarged Site and Landscape Plans showing an enhanced building entrance including, but not limited to, a canopy, paving and/or landscape features.

   b. **Parking Garage.** Exterior screening shall be installed to minimize the spill light from lights within the parking garage. The screening shall also be installed so as to minimize the views and potential glare of headlights of motor vehicles within the garage from the public right-of-way. Screening measures may include, but are not limited to, shielding attached to the luminaire, building, or site structures.

   c. **Landscaping.**

      i. Submit a Landscape Plan showing landscaping, such as climbing vines, which will cover the entire First and Second Floor Plans parking garage walls.

      ii. Submit Landscape Plans showing all levels where landscaping is proposed and required.

      iii. All open areas not used for buildings, driveways, parking areas, recreational facilities or walks shall be attractively landscaped, including an automatic irrigation system, and maintained in accordance with a landscape plan prepared by a licensed landscape architect or licensed architect, and submitted for approval to the Department of City Planning.

      iv. All planters containing trees shall have a minimum depth of 48 inches (48”), including those located on the rooftop.

   d. **Mechanical Equipment.** All mechanical equipment on the roof shall be screened from view. The transformer, if located in the front yard, shall be screened with landscaping.

   e. **Lighting.** Outdoor lighting shall be designed and installed with shielding, such that the light source does not illuminate adjacent residential properties or the public right-of-way, nor the above skies.

   f. **Maintenance.** The subject property (including all trash storage areas, associated parking facilities, walkways, common open space, and exterior walls along the property lines) shall be maintained in an attractive condition and shall be kept free of trash and debris.

Administrative Conditions

10. **Final Plans.** Prior to the issuance of any building permits for the project by the Department of Building & Safety, the applicant shall submit all final construction plans that are awaiting issuance of a building permit by the Department of Building & Safety for final review and approval by the Department of City Planning. All plans that are awaiting issuance of a building permit by the Department of Building & Safety shall be stamped by Department of City Planning staff "Final Plans". A copy of the Final Plans, supplied by the applicant, shall be retained in the subject case file.

11. **Notations on Plans.** Plans submitted to the Department of Building & Safety, for the purpose of processing a building permit application shall include all of the Conditions of Approval herein attached as a cover sheet and shall include any modifications or notations required herein.

12. **Approval, Verification and Submittals.** Copies of any approvals, guarantees or verification of consultations, review of approval, plans, etc., as may be required by the subject conditions, shall be provided to the Department of City Planning prior to clearance of any building permits, for placement in the subject file.

13. **Code Compliance.** Use, area, height, and yard regulations of the zone classification of the subject property shall be complied with, except where granted conditions differ herein.

14. **Covenant.** Prior to the issuance of any permits relative to this matter, an agreement concerning all the information contained in these conditions shall be recorded in the County Recorder's Office. The agreement shall run with the land and shall be binding on any subsequent property owners, heirs or assigns. The agreement shall be submitted to the Department of City Planning for approval before being recorded. After recordation, a copy bearing the Recorder's number and date shall be provided to the Department of City Planning for attachment to the file.

15. **Department of Building & Safety.** The granting of this determination by the Director of Planning does not in any way indicate full compliance with applicable provisions of the LAMC, Chapter IX (Building Code). Any corrections and/or modifications to plans made subsequent to this determination by a Department of Building & Safety Plan Check Engineer that affect any part of the exterior design or appearance of the project as approved by the Director, and which are deemed necessary by the Department of Building & Safety for Building Code compliance, shall require a referral of the revised plans back to the Department of City Planning for additional review and sign-off prior to the issuance of any permit in connection with those plans.

16. **Department of Water and Power.** Satisfactory arrangements shall be made with the Los Angeles Department of Water and Power (LADWP) for compliance with LADWP's Rules Governing Water and Electric Service. Any corrections and/or modifications to plans made subsequent to this determination in order to accommodate changes to the project due to the under-grounding of utility lines, that are outside of substantial compliance or that affect any part of the exterior design or appearance of the project as approved by the Director, shall require a referral of the revised plans back to the Department of City Planning for additional review and sign-off prior to the issuance of any permit in connection with those plans.

17. **Enforcement.** Compliance with and the intent of these conditions shall be to the satisfaction of the Department of City Planning.

18. **Expiration.** In the event that this grant is not utilized within three years of its effective date (the day following the last day that an appeal may be filed), the grant shall be considered null and void. Issuance of a building permit, and the initiation of, and diligent continuation of, construction activity shall constitute utilization for the purposes of this grant.

19. **Expedited Processing Section Fee.** Prior to the clearance of any conditions, the applicant shall show proof that all fees have been paid to the Department of City Planning, Expedited Processing Section.

20. **Indemnification and Reimbursement of Litigation Costs.**

    Applicant shall do all of the following:

    a. Defend, indemnify and hold harmless the City from any and all actions against the City relating to or arising out of, in whole or in part, the City's processing and approval of this entitlement, including but not limited to, an action to attack, challenge, set aside, void, or otherwise modify or annul the approval of the entitlement, the environmental review of the entitlement, or the approval of subsequent permit decisions, or to claim personal property damage, including from inverse condemnation or any other constitutional claim.

    b. Reimburse the City for any and all costs incurred in defense of an action related to or arising out, in whole or in part, of the City's processing and approval of the entitlement, including but not limited to payment of all court costs and attorney's fees, costs of any judgments or awards against the City (including an award of attorney's fees), damages, and/or settlement costs.

    c. Submit an initial deposit for the City's litigation costs to the City within 10 days' notice of the City tendering defense to the applicant and requesting a deposit. The initial deposit shall be in an amount set by the City Attorney's Office, in its sole discretion, based on the nature and scope of action, but in no event shall the initial deposit be less than $50,000. The City's failure to notice or collect the deposit does not relieve the applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).

    d. Submit supplemental deposits upon notice by the City. Supplemental deposits may be required in an increased amount from the initial deposit if found necessary by the City to protect the City's interests. The City's failure to notice or collect the deposit does not relieve the applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).

    e. If the City determines it necessary to protect the City's interest, execute an indemnity and reimbursement agreement with the City under terms consistent with the requirements of this condition.

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

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

For purposes of this condition, the following definitions apply:

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

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

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

PROJECT BACKGROUND

The subject property is a sloping, rectangular, 20,000 square-foot (0.46 acre) lot comprised of two (2) lots with a 100 frontage along the eastern side of Sunset Boulevard and a depth of 200 feet. The subject property is zoned C2-1VL within the Silver Lake – Echo Park – Elysian Valley Community Plan Area with a General Commercial land use designation. The project site is located within a Hillside Area, a Transit Priority Area, and a State Enterprise Zone. The project site is not located within the boundaries of or subject to any specific plan, community design overlay, or interim control ordinance.

The property is currently improved with 10 residential units totaling 5,280 square feet. The proposed project includes the demolition of the existing 10 residential structures and the construction, use, and maintenance of a new, seven-story, 70-unit residential development with six (6) units (8% of the total number of dwelling units) set aside for Extremely Low Income Households. The proposed development consists of two (2) buildings (Building A and Building B). In total, the proposed development will encompass a total of 55,000 square feet of floor area resulting in a Floor Area Ratio (FAR) of 2.75 to 1. The project proposes a total of 38 parking spaces, 70 long-term bicycle spaces and seven (7) short-term bicycle spaces. The unit mix will be comprised of 27 studios and 43 one-bedroom units. A total of 7,025 square feet of open space will be provided throughout the proposed project. The project will maintain a 0-foot front yard, a 10-foot northern side yard, a 7-foot 6-inch southern side yard, and a 15-foot rear yard.

Building A is located on the eastern portion of the lot with a frontage along Sunset Boulevard. and consists of five (5) residential levels over two (2) levels of at grade parking with a maximum height of 68 feet. Building B will be constructed with six (6) residential levels over one (1) level of at-grade parking with a maximum height of 68. The project also includes the export of approximately 18,200 cubic yards of earth.

SURROUNDING PROPERTIES

Surrounding properties are generally developed with single-family and multi-family residential developments and commercial uses. Properties to the north abutting the subject property are zoned C2-1VL and are improved with a single-story restaurant and associate parking. Properties to the east abutting the subject property are zoned [Q]R3-1VL and are improved with a single-family home and an apartment building. Properties to the south abutting the subject property are zoned C2-1VL and are improved with a boarding house and vacant one-story commercial buildings. Properties to the west, across Sunset Boulevard, are zoned C2-1VL and are improved with a one-story commercial building and a Taoist temple.

STREETS

Sunset Boulevard, adjoining the subject property to the west, is an Avenue II dedicated to a width of 100 feet and improved with concrete curb, gutter, and sidewalk.

TRANSIT ORIENTED COMMUNITIES

Pursuant to the voter-approved Measure JJJ, Los Angeles Municipal Code (LAMC) 12.22-A,31 was added to create the Transit Oriented Communities (TOC) Affordable Housing Incentive Program (TOC Program). The Measure requires the Department of City Planning to create TOC Affordable Housing Incentive Program Guidelines (TOC Guidelines) for all Housing Developments located within a one-half mile (or 2,640-foot) radius of a Major Transit Stop. These Guidelines provide the eligibility standards, incentives, and other necessary components of the TOC Program consistent with LAMC 12.22-A,31.

A qualifying TOC Project shall be granted Base Incentives with regard to increased residential density, increased floor area ratio, and reduced automobile parking requirements. In addition to these Base Incentives, an eligible project may be granted Additional Incentives with regard to yards and setbacks, open space, lot coverage, lot width, averaging, density calculation, height, and developments in public facilities zones. Up to three (3) Additional Incentives may be granted in exchange for providing the requisite set aside of affordable housing as enumerated in the TOC Guidelines.

The proposed project, which sets aside 8% of the total number of units for Extremely Low Income Households, meets all eligibility requirements for the TOC Affordable Housing Incentive Program and is entitled to the Base Incentives. In addition, the subject property is located within a Tier 1 TOC Affordable Housing Incentive Area as the property is located within 2,640 feet from an intersection of two or more bus routes with a service interval of 15 minutes or less during the morning and afternoon peak commute periods (intersection of Temple Street and Edgeware Road where the DASH – Pico Union & Echo Park and Local Bus 10 intersect).

Given the above, the proposed project includes the following Base and Additional Incentives for a qualifying Tier 1 Project:

Tier 1 Base Incentives:

a. **Density:** The subject property is zoned C2-1VL and limited to a maximum density of one (1) dwelling unit per 400 square feet of lot area. With a lot area totaling 20,000 square feet, the project is permitted to construct up to 50 dwelling units by-right. As an eligible Housing Development, the project is entitled for a 50 percent density increase for a maximum of 75 total units. In this case, the project seeks a 40 percent density increase to permit a total of 70 units.

b. **Floor Area Ratio (FAR):** The subject property is zoned C2-1VL and limited to an FAR of 1.5 to 1. With a lot area of 20,000 square feet and a FAR limitation of 1.5 to 1, the property has a maximum permitted floor area 30,000 square feet by-right. As an eligible Housing Development, the project is permitted a FAR of 2.75 to 1 in a commercial zone. The property is eligible for a FAR of 2.75 to 1 allowing up to 55,000 square feet of floor area for the property zoned C2-1VL. With the FAR Base Incentive, the project will construct a 53,049 square-foot building at a FAR of 2.54 to 1 (C2-1VL).

c. **Parking:** Pursuant to LAMC Section 12.21-A,4, the proposed 70-unit residential building would be required to provide a total of 90 residential parking spaces. However an Eligible Housing Development pursuant to the TOC Guidelines requires residential parking at a ratio of 0.5 spaces per bedroom. With the utilization of the parking reduction, the project will provide a total of 38 residential parking spaces.

Tier 1 Additional Incentives:

Pursuant to the Transit Oriented Communities Affordable Housing Incentive Program Guidelines (TOC Guidelines), the Tier 1 Project is eligible for and has been granted three (3) Additional Incentives in order to construct the proposed project:

a. **Rear Yard.** A 25% reduction in the required rear yard to allow 15 feet in lieu of the minimum 19 feet required for a seven-story housing development in the C2-1VL Zone.

b. **Side Yard.** A 25% reduction in the required southern side yard to allow seven (7) feet and six (6) inches in lieu of the minimum 10 feet required for a seven-story housing development in the C2-1VL Zone.

c. **Height.** The TOC height incentive allows for an additional 11 feet in height thereby creating a building envelope with the area necessary to accommodate the affordable housing units. The project is 68 feet in height, 11 feet above the allowable 57 feet maximum height.

HOUSING REPLACEMENT

Pursuant to LAMC Section 12.22-A,31(b)(1), a Housing Development located within a Transit Oriented Communities (TOC) Affordable Housing Incentive Area shall be eligible for TOC Incentives if it meets any applicable replacement requirements of California Government Code Section 65915(c)(3) (California State Density Bonus Law).

Assembly Bill 2222 (AB 2222) amended the State Density Bonus Law to require applicants of density bonus projects filed as of January 1, 2015 to demonstrate compliance with the housing replacement provisions which require replacement of rental dwelling units that either exist at the time of application of a Density Bonus project, or have been vacated or demolished in the five-year period preceding the application of the project. This applies to all pre-existing units that have been subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of lower or very low income; subject to any other form of rent or price control; or occupied by Low or Very Low Income Households.

On September 28, 2016, Governor Brown signed Assembly Bill 2556 (AB 2556) which further amended the State Density Bonus Law. The amendments took effect on January 1, 2017. AB 2556 clarifies the implementation of the required replacement of affordable units in Density Bonus projects, first introduced by AB 2222. AB 2556 further defines “equivalent size” to mean that as a

whole, the new units must contain at least the same total number of bedrooms as the units being replaced.

Pursuant to the Determination made by HCIDLA dated October 25, 2018 and attached to the subject case file, HCIDLA has determined that there existed 10 Rent Stabilization Ordinance (RSO) units within the past five (5) years with no income documents provided. HCIDLA has determined that seven (7) units need to be replaced with equivalent type, with four (4) units restricted to Extremely Low Income Households, two (2) units restricted to Very Low Income Households, and one (1) unit restricted to Low Income Households. Refer to the Transit Oriented Communities Affordable Housing Incentive Program Background section of this determination for additional information.

TRANSIT ORIENTED COMMUNITIES AFFORDABLE HOUSING INCENTIVE PROGRAM ELIGIBILITY REQUIREMENTS

To be an eligible Transit Oriented Communities (TOC) Housing Development, a project must meet the Eligibility criteria set forth in Section IV of the Transit Oriented Communities Affordable Housing Incentive Program Guidelines (TOC Guidelines). A Housing Development located within a TOC Affordable Housing Incentive Area shall be eligible for TOC Incentives if it meets all of the following requirements, which it does:

1. ***On-Site Restricted Affordable Units.*** *In each Tier, a Housing Development shall provide On-Site Restricted Affordable Units at a rate of at least the minimum percentages described below. The minimum number of On-Site Restricted Affordable Units shall be calculated based upon the total number of units in the final project.*

    a. *Tier 1 - 8% of the total number of dwelling units shall be affordable to Extremely Low Income (ELI) income households, 11% of the total number of dwelling units shall be affordable to Very Low (VL) income households, or 20% of the total number of dwelling units shall be affordable to Lower Income households.*

    b. *Tier 2 - 9% ELI, 12% VL or 21% Lower.*

    c. *Tier 3 - 10% ELI, 14% VL or 23% Lower.*

    d. *Tier 4 - 11% ELI, 15% VL or 25% Lower.*

    The project site is located within a Tier 1 TOC Affordable Housing Incentive Area. As part of the proposed development, the project is required to reserve eight (8) percent of the total number of on-site dwelling units for Extremely Low Income Households. The project will reserve a total of six (6) on-site dwelling units for Extremely Low Income Households, which equates to approximately 8.5 percent of the 70 total dwelling units proposed as part of the Housing Development, and thus meets the eligibility requirement for On-Site Restricted Affordable Units.

2. ***Major Transit Stop.*** *A Housing Development shall be located on a lot, any portion of which must be located within 1,500 feet of a Major Transit Stop consisting of two (2) rapid bus routes, as defined in Section II and according to the procedures in Section III.2 of the TOC Guidelines.*

    As defined in the TOC Guidelines, a Major Transit Stop means a site with an existing rail transit station or the intersection of two or more major bus routes with a frequency of

service interval of 15 minutes or less during the morning and afternoon peak commute periods. The subject property is located within a Tier 1 TOC Affordable Housing Incentive Area, qualified by its proximity to the intersection of a Major Transit Stop. The subject property is located within a Tier 1 TOC Affordable Housing Incentive Area as the property is located within 2,640 feet from a Major Transit Stop (intersection of Temple Street and Edgeware Road where Local Bus 10 and DASH – Pico Union & Echo Park intersect).

3. ***Housing Replacement.*** *A Housing Development must meet any applicable housing replacement requirements of California Government Code Section 65915(c)(3), as verified by the Department of Housing and Community Investment (HCIDLA) prior to the issuance of any building permit. Replacement housing units required per this section may also count towards other On-Site Restricted Affordable Units requirements.*

   Pursuant to the Determination made by HCIDLA dated October 25, 2018 and attached to the subject case file, HCIDLA has determined that there existed 10 Rent Stabilization Ordinance (RSO) units within the past five (5) years with no income documents provided. HCIDLA has determined that seven (7) units need to be replaced with equivalent type, with four (4) units restricted to Extremely Low Income Households, two (2) units restricted to Very Low Income Households, and one (1) unit restricted to Low Income Households. As such, the project meets the eligibility requirement for providing replacement housing consistent with California Government Code Section 65915(c)(3).

4. ***Other Density or Development Bonus Provisions.*** *A Housing Development shall not seek and receive a density or development bonus under the provisions of California Government Code Section 65915 (state Density Bonus law) or any other State or local program that provides development bonuses. This includes any development bonus or other incentive granting additional residential units or floor area provided through a General Plan Amendment, Zone Change, Height District Change, or any affordable housing development bonus in a Transit Neighborhood Plan, Community Plan Implementation Overlay (CPIO), Specific Plan, or overlay district.*

   The project is not seeking any additional density or development bonuses under the provisions of the State Density Bonus Law or any other State or local program that provides development bonuses, including, but not limited to a General Plan Amendment, Zone Change, Height District Change, or any affordable housing development bonus in a Transit Neighborhood Plan, Community Implementation Overlay (CPIO), Specific Plan, or overlay district. As such, the project meets this eligibility requirement.

5. ***Base Incentives and Additional Incentives.*** *All Eligible Housing Developments are eligible to receive the Base Incentives listed in Section VI of the TOC Guidelines. Up to three Additional Incentives listed in Section VII of the TOC Guidelines may be granted based upon the affordability requirements described below. For the purposes of this section below "base units" refers to the maximum allowable density allowed by the zoning, prior to any density increase provided through these Guidelines. The affordable housing units required per this section may also count towards the On-Site Restricted Affordable Units requirement in the Eligibility Requirement No. 1 above (except Moderate Income units).*

   a. *One Additional Incentive may be granted for projects that include at least 4% of the base units for Extremely Low Income Households, at least 5% of the base units for Very Low Income Households, at least 10% of the base units for Lower Income*

Households, or at least 10% of the base units for persons and families of Moderate Income in a common interest development.

b. *Two Additional Incentives may be granted for projects that include at least 7% of the base units for Extremely Low Income Households, at least 10% of the base units for Very Low Income Households, at least 20% of the base units for Lower Income Households, or at least 20% of the base units for persons and families of Moderate Income in a common interest development.*
c. *Three Additional Incentives may be granted for projects that include at least 11% of the base units for Extremely Low Income Households, at least 15% of the base units for Very Low Income Households, at least 30% of the base units for Lower Income Households, or at least 30% of the base units for persons and families of Moderate Income in a common interest development.*

As an eligible housing development, the project is eligible to receive the Base Incentives listed in the TOC Guidelines. The project is also seeking three (3) Additional Incentives for increased height and reduced setbacks. The project may be granted three (3) Additional Incentives for reserving at least 12 percent of the base units for Extremely Low Income Households. The project is setting aside six (6) units for Extremely Low Income Households, which equates to approximately 12 percent of the 50 base units permitted through the underlying zoning of the site. As such, the project meets the eligibility requirements for both on-site restricted affordable units and Base and Additional Incentives.

6. ***Projects Adhering to Labor Standards.*** *Projects that adhere to the labor standards required in LAMC 11.5.11 may be granted two Additional Incentives from the menu in Section VII of these Guidelines (for a total of up to five Additional Incentives).*

   The project is not seeking any Additional Incentives beyond the three (3) permitted in exchange for reserving at least 11% percent of the base units for Extremely Low Income Households. The project is setting aside six (6) units for Extremely Low Income Households, which equates to approximately 12 percent of the 50 base units permitted through the underlying zoning of the site. As such, the project need not adhere to the labor standards required in LAMC Section 11.5.11, and this eligibility requirement does not apply.

7. ***Multiple Lots.*** *A building that crosses one or more lots may request the TOC Incentives that correspond to the lot with the highest Tier permitted by Section III above.*

   The proposed building crosses two (2) lots; however, both lots are located within a Tier 1 TOC Affordable Housing Incentive Area. As such, this eligibility requirement does not apply.

8. ***Request for a Lower Tier.*** *Even though an applicant may be eligible for a certain Tier, they may choose to select a Lower Tier by providing the percentage of On-Site Restricted Affordable Housing units required for any lower Tier and be limited to the Incentives available for the lower Tier.*

   The applicant has not selected a Lower Tier and is not providing the percentage of On-Site Restricted Affordable Housing units required for any lower Tier. As such, this eligibility requirement does not apply.

9. ***100% Affordable Housing Projects.*** *Buildings that are Eligible Housing Developments that consist of 100% On-Site Restricted Affordable units, exclusive of a building manager's unit or units shall, for purposes of these Guidelines, be eligible for one increase in Tier than otherwise would be provided.*

   The project does not consist of 100% On-Site Restricted Affordable units, and thus it is not eligible for or seeking an increase in Tier. As such, this eligibility requirement does not apply.

10. ***Design Conformance.*** *Projects seeking to obtain Additional Incentives shall be subject to any applicable design guidelines, including any Community Plan design guidelines, Specific Plan design guidelines and/or Citywide Design Guidelines and may be subject to conditions to meet design performance. The conditions shall not preclude the ability to construct the building with the residential density permitted by Section VI.*

    The project seeks three (3) Additional Incentives and therefore has been conditioned to conform to the Silver Lake – Echo Park - Elysian Community Plan Urban Design Chapter and Citywide Design Guidelines, including, but not limited to creating a prominent ground residential entry with a highly visible lobby, screening the parking garage from view from the public right-of-way to provide visual interest.

TRANSIT ORIENTED COMMUNITIES AFFORDABLE HOUSING INCENTIVE PROGRAM / AFFORDABLE HOUSING INCENTIVES COMPLIANCE FINDINGS

Pursuant to Section 12.22-A,31(e) of the LAMC, the Director shall review a Transit Oriented Communities Affordable Housing Incentive Program project application in accordance with the procedures outlined in LAMC Section 12.22-A,25(g).

1. Pursuant to Section 12.22 A.25(g) of the LAMC, the Director shall approve a density bonus and requested incentive(s) unless the director finds that:

a. The incentives do not require in identifiable and actual cost reductions to provide for affordable housing costs, as defined in California Health and Safety Code Section 5005.2 or Section 50053 for rents for the affordable units.

The California Health & Safety Code Sections 50052.5 and 50053 define formulas for calculating affordable housing costs for very low, low, and moderate income households. Section 50052.5 addresses owner-occupied housing and Section 50053 addresses rental households. Affordable housing costs are a calculation of residential rent or ownership pricing not to exceed a percent gross income based on area median income thresholds dependent on affordability levels. There were no substantial evidence that would allow the Director to make a finding that the requested incentives are not necessary to provide for affordable housing costs per State Law.

The list of base incentives in the Transit Oriented Communities Guidelines were pre-evaluated at the time the Transit Oriented Communities Affordable Housing Incentive Program Ordinance was adopted to include various types of relief that minimize restrictions on the size of the project. The base incentives are required to provide for affordable housing costs because the incentives by their nature may result in increasing the scale of the project. The additional incentives requested to utilize up to a 25 percent reduction in the side and rear yard requirements and increase in height would result in building design or construction efficiencies that provide for affordable housing costs. As

a result of the prescribed incentives, it is likely that the Director will always conclude that the incentives are required for such projects to provide for affordable housing units as identified by the TOC Guidelines.

Rear Yard. Eligible Housing Developments in Tier 1 may reduce the required width or depth of the rear yard or setback by up to 25%. In this case, the project would be required a 19 rear yard. The project seeks to utilize the permitted reduction thereby establishing a minimum 15-foot rear yard requirement. This requested incentive will allow the developer to reduce setback requirements so the units reserved for affordable housing can be constructed and the overall space dedicated to residential uses is increased. These incentives support the applicant's decision to reserve eight (8) units for affordable housing.

Side Yards. Eligible Housing Developments in Tier 1 in residential zones may reduce the required width or depth of two (2) individual yards or setbacks by up to 25%. In this case, the project would be required nine-foot side yards. The project seeks to utilize the permitted reduction thereby establishing a minimum seven-foot, six-inch (7'-6") side yard requirement for both side yards. This requested incentive will result in a building design that facilitates affordable housing costs and supports the applicant's decision to reserve six (6) units for Extremely Low Income Households.

Height. Eligible Housing Developments in Tier 1 may increase the maximum permitted building height by one (1) additional story up to 11 additional feet. The C2-1VL allows for a maximum height of 45 feet. Pursuant to LAMC Section 12.21.1-B,2, whenever the highest point of elevation of the adjoining sidewalk or ground surface within a five-foot horizontal distance measured from the exterior wall of a building exceeds grade level by more than 20 feet, a building or structure may exceed the height by not more than 12 feet. Therefore, the maximum height allowed on the site is 57 feet. With the utilization of the incentive, the project would be allowed a maximum height of 68 feet above the otherwise permitted 57 feet. This requested incentive will result in a building design that facilitates affordable housing costs and supports the applicant's decision to reserve six (6) units for Extremely Low Income Households.

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

There is no evidence that the proposed incentive will have a specific adverse impact upon public health and safety or the physical environment, or any real property that is listed in the California Register of Historical Resources. A "specific adverse impact" is defined as "a significant, quantifiable, direct and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete" (LAMC Section 12.22 A.25(b)). The project does not involve a contributing structure in a designated Historic Preservation Overlay Zone or on the City of Los Angeles list of Historical-Cultural Monuments. According to ZIMAS, the project is not located on a substandard street in a Hillside area or a Very High Fire Hazard Severity Zone. Additionally, on March 2, 2021 the City Council disapproved the Cultural Heritage Commission's recommendation to include the

Stires Staircase Bungalow Court located at the project site as a Historic Cultural Monument, therefore, there is no substantial evidence that the proposed project, and thus the requested incentive, will have a specific adverse impact on the physical environment, on public health and safety or the physical environment, or on any Historical Resource.

ADDITIONAL MANDATORY FINDINGS

2. The National Flood Insurance Program rate maps, which are a part of the Flood Hazard Management Specific Plan adopted by the City Council by Ordinance No. 172,081, have been reviewed and it has been determined that this project is located in Zone C2-1VL, which is categorized as areas of 0.2% annual chance flood.

TRANSIT ORIENTED COMMUNITIES AFFORDABLE HOUSING INCENTIVE PROGRAM BACKGROUND

Measure JJJ was adopted by the Los Angeles City Council on December 13, 2016. Section 6 of the Measure instructed the Department of City Planning to create the Transit Oriented Communities (TOC) Affordable Housing Incentive Program, a transit-based affordable housing incentive program. The measure required that the Department adopt a set of TOC Guidelines, which establish incentives for residential or mixed-use projects located within ½ mile of a major transit stop. Major transit stops are defined under existing State law.

The TOC Guidelines, adopted September 22, 2017, establish a tier-based system with varying development bonuses and incentives based on a project's distance from different types of transit. The largest bonuses are reserved for those areas in the closest proximity to significant rail stops or the intersection of major bus rapid transit lines. Required affordability levels are increased incrementally in each higher tier. The incentives provided in the TOC Guidelines describe the range of bonuses from particular zoning standards that applicants may select.

TIME LIMIT – OBSERVANCE OF CONDITIONS

All terms and conditions of the Director's Determination shall be fulfilled before the use may be established. Pursuant to LAMC Section 12.25-A,2, the instant authorization is further conditional upon the privileges being utilized within **three years** after the effective date of this determination and, if such privileges are not utilized, building permits are not issued, or substantial physical construction work is not begun within said time and carried on diligently so that building permits do not lapse, the authorization shall terminate and become void.

The applicant's attention is called to the fact that this grant is not a permit or license and that any permits and licenses required by law must be obtained from the proper public agency. Furthermore, if any condition of this grant is violated or not complied with, then the applicant or his successor in interest may be prosecuted for violating these conditions the same as for any violation of the requirements contained in the Municipal Code, or the approval may be revoked.

Verification of condition compliance with building plans and/or building permit applications are done at the Development Services Center of the Department of City Planning at either Figueroa Plaza in Downtown Los Angeles, West Los Angeles Development Services Center, or the Marvin Braude Constituent Service Center in the Valley. In order to assure that you receive service with a minimum amount of waiting, applicants are encouraged to schedule an appointment with the Development Services Center either by calling (213) 482-7077, (310) 231-2901, (818) 374-5050,

or through the Department of City Planning website at http://cityplanning.lacity.org. The applicant is further advised to notify any consultant representing you of this requirement as well.

Section 11.00 of the LAMC states in part (m): "It shall be unlawful for any person to violate any provision or fail to comply with any of the requirements of this Code. Any person violating any of the provisions or failing to comply with any of the mandatory requirements of this Code shall be guilty of a misdemeanor unless that violation or failure is declared in that section to be an infraction. An infraction shall be tried and be punishable as provided in Section 19.6 of the Penal Code and the provisions of this section. Any violation of this Code that is designated as a misdemeanor may be charged by the City Attorney as either a misdemeanor or an infraction. Every violation of this determination is punishable as a misdemeanor unless provision is otherwise made, and shall be punishable by a fine of not more than $1,000 or by imprisonment in the County Jail for a period of not more than six months, or by both a fine and imprisonment."

TRANSFERABILITY

This determination runs with the land. In the event the property is to be sold, leased, rented or occupied by any person or corporation other than yourself, it is incumbent that you advise them regarding the conditions of this grant. If any portion of this approval is utilized, then all other conditions and requirements set forth herein become immediately operative and must be strictly observed.

APPEAL PERIOD - EFFECTIVE DATE

The Determination in this matter will become effective after September 10, 2021 unless an appeal there from is filed with the City Planning Department. It is strongly advised that appeals be filed early during the appeal period and in person so that imperfections/incompleteness may be corrected before the appeal period expires. Any appeal must be filed on the prescribed forms, accompanied by the required fee, a copy of this Determination, and received and receipted at a public office of the Department of City Planning on or before the above date or the appeal will not be accepted. Forms are available on-line at www.cityplanning.lacity.org.

Planning Department public offices are located at:

Figueroa Plaza	**Marvin Braude San Fernando Valley Constituent Service Center**	**West Los Angeles Development Services Center**
201 North Figueroa Street, 4th Floor	6262 Van Nuys Boulevard, Suite 251	1828 Sawtelle Boulevard, 2nd Floor
Los Angeles, CA 90012	Van Nuys, CA 91401	Los Angeles, CA 90025
(213) 482-7077	(818) 374-5050	(310) 231-2901

Pursuant to LAMC Section 12.22-A,25(f), only abutting property owners and tenants can appeal the Transit Oriented Communities Affordable Housing Incentive Program portion of this determination. Per the Density Bonus Provision of State Law (Government Code Section §65915) the Density Bonus increase in units above the base density zone limits and the appurtenant parking reductions are not a discretionary action and therefore cannot be appealed. Only the requested incentives are appealable. Per Section 12.22-A,25 of the LAMC, appeals of Density Bonus Compliance Review cases are heard by the City Planning Commission.

The time in which a party may seek judicial review of this determination is governed by California Code of Civil Procedures Section 1094.6. Under that provision, a petitioner may seek judicial review of any decision of the City pursuant to California Code of Civil Procedure Section 1094.5,

only if the petition for writ of mandate pursuant to that section is filed no later than the 90th day following the date on which the City's decision becomes final.

Note of Instruction Regarding the Notice of Exemption: Applicant is hereby advised to file the Notice of Exemption for the associated categorical exemption after the issuance of this letter. If filed, the form shall be filed with the County of Los Angeles, 12400 Imperial Highway, Norwalk, CA 90650, pursuant to Public Resources Code Section 21152 (b). More information on the associated fees can be found online here: https://www.lavote.net/home/county-clerk/environmental-notices-fees. The best practice is to go in person and photograph the posted notice in order to ensure compliance. Pursuant to Public Resources Code Section 21167 (d), the filing of this notice of exemption starts a 35-day statute of limitations on court challenges to the approval of the project. Failure to file this notice with the County Clerk results in the statute of limitations, **and the possibility of a CEQA appeal**, being extended to 180 days.

Vincent P. Bertoni, AICP
Director of Planning

Reviewed and Approved by:

Heather Bleemers, Senior City Planner

Prepared by:

Stephanie Escobar

Stephanie Escobar, Planning Assistant
Stephanie.escobar@lacity.org

Attachments:
Exhibit A: Architectural Plans

70 UNIT APPARTMENTS

1251 Sunset Blvd, Los Angeles, CA 90026

EXHIBIT "A"
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Case No. DIR-2018-6634-TOC

NOTES

GENERAL:

1. CONTRACTOR SHALL BE RESPONSIBLE FOR PROVIDING ALL LABOR AND MATERIALS IN ACCORDANCE WITH ALL APPLICABLE CODES, ORDINANCES AND REQUIREMENTS.

2. THE CONTRACTOR SHALL VERIFY ALL FIELD DIMENSIONS AND CONDITIONS AND SHALL CALL TO THE ARCHITECT OR DESIGNER OF ANY QUESTIONS OR CONFLICT FOR RESOLUTION BEFORE PROCEEDING WITH WORK.

3. DO NOT SCALE DRAWINGS. NOTED DIMENSIONS TAKE PRECEDENCE OVER SCALED DIMENSIONS. DIMENSIONS ARE SHOWN FROM FACE OF STUD OF EXISTING WALL UNLESS OTHERWISE NOTED.

4. ALL SYMBOLS AND ABBREVIATIONS USED ON THE DRAWINGS ARE CONSIDERED TO BE CONSTRUCTION STANDARDS. THE DESIGNER SHALL BE NOTIFIED FOR CLARIFICATIONS REQUIRED.

5. TEMPORARY PEDESTRIAN PROTECTION SHALL BE PROVIDED AS PER SECTION 303.7

6. CONTRACTOR SHALL BE RESPONSIBLE FOR VERIFICATION AND COORDINATION WITH OTHER TRADES OR SUB - CONTRACTORS AND THEIR WORK TO ENSURE COMPLIANCE WITH THE DRAWINGS AND SPECIFICATIONS.

7. CONTRACTOR SHALL PROVIDE ALL NECESSARY SAFETY DEVICES, TEMPORARY BARRICADES, SCAFFOLDING, LIGHTING, COVERINGS, FIRE PREVENTION AND OTHER EQUIPMENT TO PROTECT THE SAFETY OF ALL PERSONS ON THE PROPERTY THROUGHOUT THE ENTIRE PERIOD OF CONSTRUCTION.

8. THE CONTRACTOR SHALL BE RESPONSIBLE FOR CONTINUOUS CLEANUP OF THE SITE OF ALL DEBRIS WHETHER CREATED BY HIS WORK OR THE FAILURE OF HIS SUBCONTRACTORS TO CLEAN UP AFTER THEIR WORK.

9. ALL WORK SHALL COMPLY WITH APPLICABLE FEDERAL LAWS, STATE STATUTES, LOCAL ORDINANCES AND REGULATIONS OF AGENCIES HAVING JURISDICTION.

10. CONTRACTOR SHALL PROVIDE AND LOCATE ACCESS PANELS AS REQUIRED AFTER INSTALLATION OF PLUMBING, MECHANICAL DUCTS AND ELECTRICAL WORK.

11. INSTALL APPROVED FIRE-RATED DAMPERS WHERE DUCTS PENETRATE FIRE RATED PARTITIONS, CEILING AND FLOOR ASSEMBLIES.

12. GENERAL CONTRACTOR TO ENSURE THAT ALL PARTITIONS ARE ATTACHED OR BRACED TO STRUCTURAL MEMBERS AND/OR SLAB ABOVE AS REQUIRED TO BE SAFE AND SECURE. SUPPORT LATERALLY AND SEISMICALLY AS REQUIRED BY APPLICABLE CODES.

13. THE CONTRACTOR SHALL ASSUME FULL RESPONSIBILITY FOR COMPLYING WITH THE CONSTRUCTION SAFTEY ORDERS AND THE GENERAL INDUSTRIAL SAFTEY ORDERS OF THE STATE DIVISION OF INDUSTRIAL SAFTEY, HEALTH ADMINISTRATIONS AND SUCH OTHER AGENCIES GOVERNING THE CONTRACTORS ACTS.

14. THE CONTRACTOR SHALL BE RESPONSIBLE FOR AND HOLD HARMLESS THE DESIGNER FOR ANY DAMAGES AND / OR PENALTY RESULTING FROM HIS FAILURE TO COMPLY WITH SAID LAWS, STATUTES, ORDINANCES AND REGULATIONS.

15. THE DESIGN ADEQUACY AND SAFTEY OF ERECTION BRACING, SHORING, TEMPORARY SUPPORTS, ETC. IS THE SOLE RESPONSIBILITY OF THE GENERAL CONTRACTOR AND HAS NOT BEEN CONSIDERED BY THE ARCHITECT.

16. THE GENERAL CONTRACTOR IS RESPONSIBLE FOR THE STABILITY OF THE STRUCTURE PRIOR TO THE APPLICATION OF ALL SHEAR WALLS, ROOF AND FLOOR DIAPHRAMS AND FINISH MATERIALS. THE CONTRACTOR SHALL PROVIDE THE NECESSARY BRACING TO PROVIDE STABILITY PRIOR TO THE APPLICATION OF THE ABOVE LISTED MATERIALS.

17. CONTRACTOR TO PROVIDE NECESSARY MEASURES TO DEQUATELY CONNECT PLUMBING LINES TO EXISTING RESIDENTIAL LINES, PROVIDING A MIN. 2% SLOPE AS REQUIRED BY U.P.C. CODES AND GOVERNING CITY, COUNTY AGENCIES.

18. ALL EXTERIOR WALL OPENING, FLASHINGS, COUNTER FLASHINGS, COPINGS AND EXPANSION JOINTS SHALL BE WEATHERPROOF.

19. APPROVED SEISMIC GAS SHUTOFF VALVE WILL BE INSTALLED ON THE FUEL GAS LINE ON THE DOWN STREAM SIDE OF THE UTILITY METER AND BE RIGIDLY CONNECTED TO THE EXTERIOR OF THE BUILDING OR STRUCTURE CONTAINING THE FUEL GAS PIPING." (PER ORDINANCE 170.158)
(SEPARATE PLUMBING PERMIT IS REQUIRED).

20. SMOKE DETECTORS SHALL BE PROVIDED FOR ALL DWELLING UNITS INTENDED FOR HUMAN OCCUPANCY, UPON THE OWNER'S APPLICATION FOR A PERMIT FOR ALTERATIONS, REPAIRS, OR ADDITIONS, EXCEEDING ONE THOUSAND DOLLARS ($1,000). (R314.6.2)

21. WHERE A PERMIT IS REQUIRED FOR ALTERATIONS, REPAIRS OR ADDITIONS EXCEEDING ONE THOUSAND DOLLARS ($1,000), EXISTING DWELLINGS OR SLEEPING UNITS THAT HAVE ATTACHED GARAGES OR FUEL-BURNING APPLIANCES SHALL BE PROVIDED WITH A CARBON MONOXIDE ALARMS SHALL ONLY BE REQUIRED IN THE SPECIFIC DWELLING UNIT OR SLEEPING UNIT FOR WHICH THE PERMIT WAS OBTAINED. (R315.2)

22. ALL EXTERIOR WALL OPENING, FLASHINGS, COUNTER FLASHINGS, COPINGS AND EXPANSION JOINTS SHALL BE WEATHERPROOF.

23. SMOKE DETECTORS SHALL BE PROVIDED FOR ALL DWELLING UNITS INTENDED FOR HUMAN OCCUPANCY, UPON THE OWNER'S APPLICATION FOR A PERMIT FOR ALTERATIONS, REPAIRS, OR ADDITIONS, EXCEEDING ONE THOUSAND DOLLARS ($1,000). (R314.6.2)

24. WHERE A PERMIT IS REQUIRED FOR ALTERATIONS, REPAIRS OR ADDITIONS EXCEEDING ONE THOUSAND DOLLARS ($1,000), EXISTING DWELLINGS OR SLEEPING UNITS THAT HAVE ATTACHED GARAGES OR FUEL-BURNING APPLIANCES SHALL BE PROVIDED WITH A CARBON MONOXIDE ALARMS SHALL ONLY BE REQUIRED IN THE SPECIFIC DWELLING UNIT OR SLEEPING UNIT FOR WHICH THE PERMIT WAS OBTAINED. (R315.2)

25. EVERY SPACE INTENDED FOR HUMAN OCCUPANCY SHALL BE PROVIDED WITH NATURAL LIGHT BY MEANS OF EXTERIOR GLAZED OPENINGS IN ACCORDANCE WITH SECTION R303.1 OR SHALL BE PROVIDED WITH ARTIFICIAL LIGHT THAT IS ADEQUATE TO PROVIDE AN AVERAGE ILLUMINATION OF 6 FOOT-CANDLES OVER THE AREA OF THE ROOM AT A HEIGHT OF 30 INCHES ABOVE THE FLOOR LEVEL. (R303.1)

26. A COPY OF THE EVALUATION REPORT AND/OR CONDITIONS OF LISTING SHALL BE MADE AVAILABLE AT THE JOB SITE.

27. APPROVED SMOKE ALARMS SHALL BE INSTALLED IN EACH SLEEPING ROOM & HALLWAY OR AREA GIVING ACCESS TO A SLEEPING ROOM, AND ON EACH STORY AND BASEMENT FOR DWELLINGS WITH MORE THAN ONE STORY. SMOKE ALARMS SHALL BE INTERCONNECTED SO THAT ACTUATION OF ONE ALARM WILL ACTIVATE ALL THE ALARMS WITHIN THE INDIVIDUAL DWELLING UNIT. IN NEW CONSTRUCTION SMOKE ALARMS SHALL RECEIVE THEIR PRIMARY POWER SOURCE FROM THE BUILDING WIRING AND SHALL BE EQUIPPED WITH BATTER BACK UP AND LOW BATTERY SIGNAL. (R314)

28. A SEPARATE PERMIT IS REQUIRED FOR THE FOLLOWING:

a.	RETAINING WALLS	e.	MECHANICAL WORK
b.	BLOCK WALLS	f.	GRADING BACKFILL
c.	FIRE SPRINKLER SYSTEM	g.	DEMOLITION WORK
d.	ELECTRICAL WORK		

29. A FIRE ALARM SYSTEM IS REQUIRED FOR THIS STRUCTURE. 3 COPIES OF THE SYSTEM PLAN SHALL BE SUBMITTED TO THE FIRE DEPARTMENT FOR APPROVAL, PRIOR TO INSTALLATION.

30. SPRINKLER SYSTEM TO BE APPROVED BY PLUMBING DEPARTMENT PRIOR TO INSTALLATION.

31. AN APPROVED AUTOMATIC SPRINKLER SYSTEM SHALL BE INSTALLED THROUGHOUT THE BUILDING. (BUILDING CODE 903 AND FIRE CODE 903)

32. GRAFFITI RESISTANT FINISH ON GROUND LEVEL WALLS TO BE "IP631 ULTRASHIELD CLEAR" BY DUNN EDWARDS CORPORATION, LARR#25162-T. AND EXTEND 9'-0" MIN. ABOVE FINISHED GRADE.

ENERGY NOTES:

1. THE BUILDING DESIGN MEETS THE REQUIREMENTS OF TITLE 24, PART 2, CHAPTER 2-53.

2. INSULATION INSTALLER SHALL POST IN A CONSPICUOUS LOCATION IN THE BUILDING A CERTIFICATE SIGNED BY THE INSTALLER AND BUILDER STATING THAT THE INSTALLATION CONFORMS WITH THE REQUIREMENTS OF TITLE 24, CHAPTER 2-53 AND THAT THE MATERIALS INSTALLED CONFORM WITH THE REQUIREMENTS OF TITLE 20, CHAPTER 2, SUBCHAPTER 4, ARTICLE 3.

3. ALL INSULATION MATERIALS SHALL BE CERTIFIED BY THE MANUFACTURER AS COMPLYING WITH THE CALIFORNIA QUALITY STANDARDS FOR UNSULATING MATERIAL.

4. DOORS AND WINDOWS BETWEEN CONDITIONED AND OUTSIDE OF UNCONDITIONED SPACES SUCH AS GARAGES AND COMPARTMENTS FOR CENTRAL AIR GAS FURNACES SHALL BE FULLY WEATHERSTRIPPED.

5. MANUFACTURED DOORS AND WINDOWS SHALL BE CERTIFIED AND LABELED IN COMPLIANCE WITH THE APPROPRIATE INFILTRATION STANDARDS.

6. CAULK PLUMBING AND ELECTRICAL PENETRATIONS, ALL WINDOWS AND DOOR FRAMES, BETWEEN WALL SOLE PLATES AND FLOORS AND ALL OTHER OPENING IN THE ENVELOPE.

7. A NIGHT SETBACK THERMOSTAT SHALL BE INSTALLED.

8. DUCTS SHALL BE CONSTRUCTED, INSTALLED AND INSULATED PER CHAPTER 10 OF UMC.

9. 25 LUMENS/WATT EFFICIENCY SHALL BE PROVIDED FOR GENERAL LIGHTING IN KITCHENS AND BATHROOMS (FLUORESCENT LIGHTS).

10. ALL OPENINGS (DOORS AND WINDOWS) SHALL BE PROPERLY WEATHER STRIPPED, CERTIFIED AND LABELED.

11. BACKDRAFT DAMPERS FOR ALL EXHAUST AND FAN SYSTEMS SHALL BE PROVIDED.

12. A R-12 EXTERIOR BLANKET SHALL BE PROVIDED FOR HOT WATER HEATER AND SOLAR TANKS.

13. R-3 INSULATION SHALL BE PROVIDED FOR THE FIRST FIVE FEET OF THE WATER HEATER OUTLET PIPE.

14. ALL WATER HEATING AND SPACE CONDITIONING EQUIPMENT, SHOWER HEADS AND FAUCETS SHALL BE C.E.C. CERTIFIED.

15. MASONRY AND FACTORY BUILT FIREPLACES SHALL BE INSTALLED WITH TIGHT FITTING, CLOSEABLE METAL OR GLASS DOORS.

16. ALL STEAM AND STEAM CONDENSATE RETURN PIPING AND ALL CONTINUOUSLY CIRCULATING DOMESTIC HEATING OR HOT WATER PIPING SHALL BE INSULATED AS REQUIRED BY THE PLUMBING DIVISION.

FIRE DEPARTMENT NOTES:

1. VERIFY 5" HIGH ADDRESS # TO BE PLACED NEAR THE ENTRANCE OF THE BUILDING IN ACCORDANCE TO LAMC 57.09.11

2. ROOF CONSTRUCTION SUCH AS TELEVISION ANTENNA GUY WIRES, SOLAR PANELS, AND RAZOR RIBBON SHALL NOT PREVENT FIRE DEPARTMENT ACCESS OR EGRESS IN THE EVENT OF A FIRE.

3. PROVIDE COLLISON BARRIERS ADEQUATE TO PROTECT CONTROL METERS, REGULATORS, AND PIPING FOR HAZARDOUS MATERIALS THAT ARE EXPOSED TO VEHICULAR DAMAGE.

4. CONSPICUOUSLY MARK GAS-SHUT-OFF VALVE

5. PROVIDE A PORTABLE FIRE EXTINGUISHER W/ A RATING OF NOT LESS THAN 2-A OR 2-A10BC WITHIN 75 FEET TRAVEL DISTANCE TO ALL PORTIONS OF THE BUILDING ON EACH FLOOR. ALSO DURING CONSTRUCTION

6. DRAFT STOPS SHALL BE PROVIDED WITHIN ATTICS, MANSARDS, OVERHANGS AND SIMILAR CONCEALED SPACES FORMED OF COMBUSTIBLE CONSTRUCTION

7. AN APPROVED PERMANENT AND RESILIENT ACOUSTICAL SEALANT SHALL BE PROVIDED ALONG THE JOINT BETWEEN THE FLOOR AND THE SEPARATION WALLS. FLOOR CEILING ASSEMBLY SHALL BE SEALED, LINED OR INSULATED

8. ALL SMOKE DETECTORS TO BE HARD-WIRED

9. PROVIDE EXIT SIGNS AND DIRECTIONAL EXIT SIGNS WITH A MINIMUM OF 6" HIGH BY 3/4" STROKE BLOCK LETTERS ON A CONTRASTING BACKGROUND @ 5 FOOT CANDLE SPACING BETWEEN SIGNS SHALL NOT EXCEED 200 FT. @ 5 FEET CANDLE.

10. FIRE DEPARTMENT CONNECTIONS SHALL BE LOCATED ON ADDRESS SIDE OF BUILDING

11. PROVIDE SINGLE STATION SMOKE DETECTOR WITHIN SLEEPING AREAS AND AREAS GIVING ACCESS TO SLEEPING AREA AND ON TOP CENTER OF STAIRS LEADING THERETO.

12. ROOF COVERING SHALL CONFORM WITH TABLE 15-A. (LAMC 91.1501)

13. INTERIOR WALL AND CEILING FINSHES SHALL COMPLY WITH TABLE 8B.

14. EXIT COURT, LESS THAN 10 FEET IN WIDTH, SHALL HAVE A MINIMUM OF ONE-HOUR, FIRE-RESISTIVE CONSTRUCTION FOR A DISTANCE OF 10 FEET ABOVE THE COURT, AND OPENING SHALL BE PROTECTED WITH THREE-FOURTHS HOUR FIRE ASSEMBLIES.

15. DRAFT STOPS ARE REQUIRED ABOVE AND IN LINE WITH WALLS SEPARATING TENANT SPACES FROM EACH OTHER AND FROM OTHER USES.

16. WINDOWS IN 1-HR CORRIDOR SHALL BE LIMITED TO FIXED GLAZING OF 45 MIN FIRE RATING AND SHALL NOT EXCEED 25% OF CORRIDOR / ROOM. COMMON WALL.

17. ALL OPENING IN FLOORS ARE REQUIRED TO BE ENCLOSED BY A SHAFT HAVING WALL, FLOOR, AND CEILING OF 1-HR FIRE RESISTIVE CONSTRUCTION.

18. DRAFT STOPS SHALL BE PROVIDED WITHIN A CONCEALED FLOOR CEILING ASSEMBLIE FORMED OF COMBUSTIBLE CONSTRUCTION

19. PROVIDE A PORTABLE FIRE EXTINGUISHER W/A RATING OF NOT LESS THAN 10BC FOR PARKING GARAGE

20. ENCLOSED USEABLE SPACE UNDER INTERIOR STAIRS REQUIRES 1 HR FIRE RESISTIVE CONSTRUCTION ON ENCLOSED SIDE.

21. PLANS FOR THE FIRE ALARM SYSTEM MUST BE SUBMITTED TO THE FIRE DEPARTMENT FOR APPROVAL PRIOR TO INSTALLATION.

FIRE EXIT SIGN NOTES:

1. EXIT SIGNS SHALL BE INTERNALLY OR EXTERNALLY ILLUMINATED (1013.3)

2. EXIT SIGNS ILLUMINATED BY EXTERNAL SOURCE SHALL HAVE INTENSITY NOT LESS THAN 5-FOOT CANDLES. (1013.6.2)

3. INTERNALLY ILLUMINATED SIGNS SHALL BE LISTED AND LABELED AND SHALL BE INSTALLED IN ACCORDANCE WITH THE MANUFACTURER'S INSTRUCTIONS AND SECTION 2702.

4. EXIT SIGNS SHALL BE ILLUMINATED AT ALL TIMES. (1013.6.3)

5. EXIT SIGNS SHALL BE CONNECTED TO AN EMERGENCY POWER SYSTEMTHAT WILL PROVIDE AN ILLUMINATION OF NOT LESS THAN90 MIN. INN CASE OF PRIMARY POWER LOSS. (1013.6.3)

6. EGRESS DOORS SHALL BE READILY OPENABLE FROM THE EGRESS SIDE WITHOUT THE USE OF A KEY OR SPECIAL KNOWLEDGE OR EFFORT. (1010.1.9)

7. DOOR HANDLES, LOCK AND OTHER OPERATING DEVICES SHALL BE INSTALLED AT A MIN 34" AND A MAX 48" ABOVE THE FINISHED FLOOR. (1010.1.9.2)

8. ALL EGRESS DOOR OPERATION SHALL ALSO COMPLY WITH SECTION 1010.1.9 - 10101.9.12.

9. ALL RATED DOORS MUST BE EITHER SELF CLOSING OR AUTOMATIC CLOSING AND HAVE A UL 1784 SMOKE AND DRAFT CONTROL SEAL. (716)

10. THE MEANS OF EGRESS INCLUDING THE EXIT DISCHARGE SHALL BE ILLUMINATED AT ALL TIMES THE BUILDING SPACE SERVED BY THE MEANS OF EGRESS IS OCCUPIED. (1008)

11. THE MEANS OF EGRESS ILLUMINATION LEVEL SHALL NOT BE LESS THAN 1' CANDLE AT THE WALKING SURFACE (1008.2.1, 1008.3.5)

12. THE POWER SUPPLY FOR MEANS OF EGRESS ILLUMINATION SHALL NORMALLY BE PROVIDED BY THE PREMISES' ELECTRICAL SUPPLY. IN THE EVENT OF POWER SUPPLY FAILURE AND EMERGENCY ELECTRICAL SYSTEM SHALL AUTOMATICALLY ILLUMINATE THE FOLLOWING AREAS:(1008.3)
a. AISLES CORRIDORS AND EXIT ACCESS STAIRWAYS AND RAMPS IN ROOMS AND SPACES THAT REQUIRE TWO OR MORE MEANS OF EGRESS. (1008.3.1)
b. INTERIOR EXIT ACCESS STAIRWAYS AND RAMPS, INTERIOR AND EXTERIOR STAIRWAYS AND RAMPS, EXIT PASSAGE WAYS, AND VESTIBULES AND AREAS ON THE LEVEL OF EXIT DISCHARGE USED FOR EXIT DISCHARGE IN ACCORDANCE WITH 1028.1 IN BUILDINGS THAT REQUIRE TWO OR MORE MEANS OF EGRESS . (1008.3.2)
c. ELECTRICAL EQUIPMENT ROOMS, FIRE COMMAND CENTERS, FIRE PUMP ROOMS, GENERATOR ROOMS AND PUBLIC RESTROOM LARGER THAN 300 SQFT. (1008.3.3)

13. THE EMERGENCY POWER SYSTEM SHALL PROVIDE POWER FOR DURATION OF NOT LESS THAN 90 MIN AND SHALL CONSIST OF STORAGE BATTERIES, UNIT EQUIPMENT OR AN ONSITE GENERATOR. THE INSTALLATION OF EMERGENCY POWER SYSTEM SHALL BE IN ACCORDANCE WITH SECTION 2702.(1008.3.4)

14. EMERGENCY LIGHTING FACILITIES SHALL BE ARRANGED TO PROVIDE INITIAL ILLUMINATION THAT IS AT LEAST AN AVERAGE OF 1' CANDLE AND A MINIMUM AT ANY POINT OF 0.1 FOOT CANDLE) MEASURED ALONG THE PATH OF EGRESS AT FLOOR LEVEL. ILLUMINATION LEVELS SHALL BE PERMITTED TO DECLINE TO 0.6 FOOT CANDLE AVERAGE AND A MINIMUM AT ANY POINT OF 0.06 FOOT CANDLE AT THE END OF THE EMERGENCY LIGHTING TIME DURATION. A MAXIMUM TO MINIMUM ILLUMINATION UNIFORMITY RATIO OF 40 TO 1 SHALL NOT BE EXCEEDED. SEE EXCEPTION FOR I-2 OCCUPANCIES. (1008.2.5)

15. THE EXIT SIGNS SHALL ALSO BE CONNECTED TO AN EMERGENCY ELECTRICAL SYSTEM PROVIDED FOR STORAGE BATTERIES UNIT EQUIPMENT OR AN ON SITE GENERATOR SET, AND THE SYSTEM SHALL BE INSTALLED IN ACCORDANCE WITH THE ELECTRICAL CODE. FOR HIGH-RISE BUILDINGS, SEE SECTION 403.

16. PROVIDE EMERGENCY RESPONDER RADIO COVERAGE. (LAFC 510.1)

SYMBOL LEGEND

- 00 — **DOOR NUMBER DESIGNATIONS**
- 00 — **WINDOW STYLE: LETTER DESIGNATIONS**
- X / A-XX — **SECTION CUT NUMBER / SHT. NO.**
- A / D / A / B / C — XX / A-XX — **ELEVATION NUMBER / SHT. NO.**
- XX / A-XX — **DETAIL NUMBER / SHT. NO.**
- %%128 0'- 0" / FIN. FLR. — **FLOOR ELEVATION**
- 1 — **REVISION NUMBER**

PROJECT INFORMATION

LEGAL DESCRIPTION

LOT 25:
ASSESSOR PARCEL (APN) : 5406016026
LOT: 25
BLOCK : NONE
TRACT: ANGELENO HEIGHTS
MAP REFERENCE: M R 10-63/66
THOMAS BROTHERS GRID: PAGE 634 - GRID F1

LOT 27:
ASSESSOR PARCEL (APN) : 5406015001
LOT: 27
BLOCK : NONE
TRACT: ANGELENO HEIGHTS
MAP REFERENCE: M R 10-63/66
THOMAS BROTHERS GRID: PAGE 634 - GRID F1

BUILDING CODES

ALL CONSTRUCTION SHALL COMPLY WITH :
- 2016 CALIFORNIA BUILDING STANDARDS ADMINISTRATIVE CODE,
- PART 1, TITLE 24 C.C.R.
- 2016 CALIFORNIA BUILDING CODE (CBC), PARTS 1 & 2, TITLE 24 C.C.R.
- 2017 LOS ANGELES BUILDING CODE
- 2017 LOS ANGELES GREEN CODE

PROJECT TYPE: NEW 70 - UNITS APARTMENT BUILDING
USE: MULTIPLE - DWELLING UNITS OCCUPANCY
ZONING: C2-1VL
LOT / PARCEL AREA: 20,000 SQFT
NUMBER OF STORIES: BUILDING A: TWO-GRADE PARKING + 5 RESIDENTIAL STORIES + ROOF DECK
BUILDING B: ONE-GRADE PARKING + 6 RESIDENTIAL STORIES + ROOF DECK
TYPE OF CONSTRUCTION: TYPE III-A (APARTMENTS) & TYPE I-A (PARKING GARAGE)
SPRINKLERED: YES, FULLY SPRINKLERED THROUGHOUT NFPA13
FIRE ALARM: FIRE ALARM SHOULD BE PROVIDED THROUGHOUT THE BUILDING
TOTAL PROJECT UNITS: 70 UNITS [27x STUDIOS + 43x 1 BED]
BUILDABLE AREA: 20,000 SQFT
MAXIMUM ALLOWABLE F.A.R: 1.5:1 [1.5 X 20,000 S.F.] = 30,000 S.F.
F.A.R INCREASE (T.O.C INCENTIVE) 2.75:1 [2.75 X 20,000 S.F.] = 55,000 S.F.
PROPOSED F.A.R:
BUILDING HEIGHT PER ZONING: 45' @ LOWEST POINT
ALLOWABLE BUILDING HEIGHT: 45' (BASE) + 11' (TIER 1) + 12' (LOT HEIGHT DIFFERENCE MORE THAN 20') = 68'-0"
PROPOSED HEIGHT: BUILDING A: 68'-0" BUILDING B: 68'-0"
FIRE ALARM PER NFPA 72: SEE 907-2-9 YES

DENSITY CALCULATIONS (TIER 1):

ALLOWABLE DENSITY (BASE) 20,000 S.F. (LOT AREA) / 400 = 50 UNITS
TOC TIER 1 DENSITY INCREASE BY 50 %: 1.5 (BONUS)x 50 UNITS (BASE) = 75 UNITS
EXTREMELY LOW INCOME UNITS: %8 x 70 UNITS (BASE) = 6 UNIT
TOTAL ALLOWABLE UNITS (TIER 1): 50 UNITS (BASE) + 25 UNITS (BONUS) = 75 UNITS
TOTAL NO. OF UNITS PROVIDED 70 UNITS

PARKING CALCULATIONSN (MIXED INCOME, 0.5 SPACE PER BEDROOM)

UNIT TYPE	QUANTITY	REQ. PARKING	TOTAL
STUDIO	27	0.5 SPACE PER BEDROOM	13.5
1 BED	43	0.5 SPACE PER BEDROOM	21.5
TOTAL: 35			

PROVIDED PARKING - NO GUEST PARKING IS REQUIRED
33x STANDARD
3x COMPACT
2x ACCESSIBLE
TOTAL PROVIDED PARKING : 38
BICYCLE PARKING PROVIDED: LONG TERM: 70(70 UNITS) SHORT TERM: 70 X%10 = 7

ZONING AREA: TOTAL (R-2) = 53,049S.F. < 55,000 S.F. TOTAL (S-2) = 16156.66 S.F.

SCHOOL FEE: 53,049 TOTAL (R-2)+ 4,435 (TOTAL STAIRWAYS) + 2086 AREA OF EXTERNAL WALLS = 59,570 S.F.

AREA SUMMARY

BUILDING A:

AREA SCHEDULE- BUILDING A

LEVEL	USE	OCCUPANCY	AREA
LEVEL A1	ELEVATOR A		71.56 SF
LEVEL A1	GARAGE A	S-2	0.00 SF
LEVEL A1	RESIDENTIAL A	R-2	215.97 SF
LEVEL A1	STAIRS A		324.56 SF
LEVEL A2	ELEVATOR A		71.56 SF
LEVEL A2	GARAGE A	S-2	5512.40 SF
LEVEL A2	RESIDENTIAL A	R-2	49.19 SF
LEVEL A2	STAIRS A		174.56 SF
LEVEL A3	ELEVATOR A		71.56 SF
LEVEL A3	RESIDENTIAL A	R-2	5562.54 SF
LEVEL A3	STAIRS A		142.57 SF
LEVEL A4	ELEVATOR A		71.56 SF
LEVEL A4	RESIDENTIAL A	R-2	5667.11 SF
LEVEL A4	STAIRS A		317.13 SF
LEVEL A5	ELEVATOR A		71.56 SF
LEVEL A5	RESIDENTIAL A	R-2	5667.11 SF
LEVEL A5	STAIRS A		317.13 SF
LEVEL A6	ELEVATOR A		71.56 SF
LEVEL A6	RESIDENTIAL A	R-2	5667.11 SF
LEVEL A6	STAIRS A		317.13 SF
LEVEL A7	ELEVATOR A		71.56 SF
LEVEL A7	RESIDENTIAL A	R-2	4768.88 SF
LEVEL A7	STAIRS A		317.13 SF

BUILDING (A) AREA: 28,169 TOTAL (R-2)+ 2,330 (TOTAL STAIRWAYS) = 30,499 S.F. 30,499 S.F. < 48,000 (TYPE IIIA, FULLY SPRINKLERED)

BUILDING B:

AREA SCHEDULE- BUILDING B

LEVEL	USE	OCCUPANCY	AREA
LEVEL B1	ELEVATOR B		74.11 SF
LEVEL B1	GARAGE B	S-2	5402.53 SF
LEVEL B1	RESIDENTIAL B	R-2	133.72 SF
LEVEL B1	STAIRS B		333.56 SF
LEVEL B2	ELEVATOR B		74.11 SF
LEVEL B2	GYM	R-2	1598.60 SF
LEVEL B2	RESIDENTIAL B	R-2	2137.10 SF
LEVEL B2	STAIRS B		295.28 SF
LEVEL B3	ELEVATOR B		74.11 SF
LEVEL B3	GYM	R-2	1018.73 SF
LEVEL B3	RESIDENTIAL B	R-2	2711.00 SF
LEVEL B3	STAIRS B		295.28 SF
LEVEL B4	ELEVATOR B		74.11 SF
LEVEL B4	RESIDENTIAL B	R-2	3732.86 SF
LEVEL B4	STAIRS B		295.28 SF
LEVEL B5	ELEVATOR B		74.11 SF
LEVEL B5	RESIDENTIAL B	R-2	3768.16 SF
LEVEL B5	STAIRS B		295.28 SF
LEVEL B6	ELEVATOR B		74.11 SF
LEVEL B6	RESIDENTIAL B	R-2	3768.16 SF
LEVEL B6	STAIRS B		295.28 SF
LEVEL B7	ELEVATOR B		74.11 SF
LEVEL B7	RESIDENTIAL B	R-2	3768.16 SF
LEVEL B7	STAIRS B		295.28 SF

BUILDING (B) AREA: 20,400 TOTAL (R-2)+ 2,105 (TOTAL STAIRWAYS) = 22,550 S.F. 22,550 S.F. < 48,000 (TYPE IIIA, FULLY SPRINKLERED)

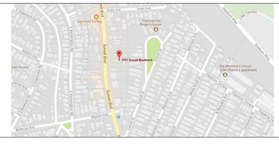
OPEN SPACE CALCULATION

REQUIRED OPEN SPACE:

UNIT TYPE	QUANTITY	REQ. OPEN SPACE / UNIT	TOTAL (S.F.)
STUDIO	27	100 S.F.	2700
1BED	43	100 S.F.	4300

TOTAL REQUIRED OPEN SPACE: 7,000 S.F.
PROVIDED OPEN SPACE:
1,706 S.F. COMMON OPEN SPACE (GYM)
900 S.F. COMMON OPEN SPACE (BUILDING A-LEVEL 7)
4,419 S.F. COMMON OPEN SPACE (ROOF DECK)
TOTAL PROVIDED OPEN SPACE = 7025 S.F.

VICINITY MAP



NORTH

PROJECT DIRECTORY

CLIENT
MICHAEL AMINPOUR
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ARCHITECT
MALY ARCHITECTS, INC.
ADDRESS: 7136 HASKELL AVE., #320 VANNUYS, CA 91406
TEL: (818) 770-0161
E:INFO@MALYARCHITECTS.COM

STRUCTURAL ENGINEER

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SECTION 11A NOTES	A7.07
SECTION 11A NOTES	A7.08
DOORS AND WINDOWS SCHEDULE	A5.04
DETAILS	A7.01
DETAILS	A7.02
DETAILS	A7.03
DETAILS	A7.09
SPECIFICATION	A0.02
CALIFORNIA GREEN FORMS	A0.03
GREEN SHEETS	A0.04
GREEN SPECIFICATION	A0.05
3D	A7.10
SECTION	A7.11
Staging Area	A7.12

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MALY ARCHITECTS INC.

NO.	DATE:
1	
2	
3	

REVISIONS

APPLICANT AND PROJECT ADDRESS:
MICHAEL AMINPOUR
1251 Sunset Blvd, Los Angeles, CA 90026

SHEET TITLE: TITLE SHEET

ARCHITECT:
FARZIN MALY
7136 Haskell Ave. #320
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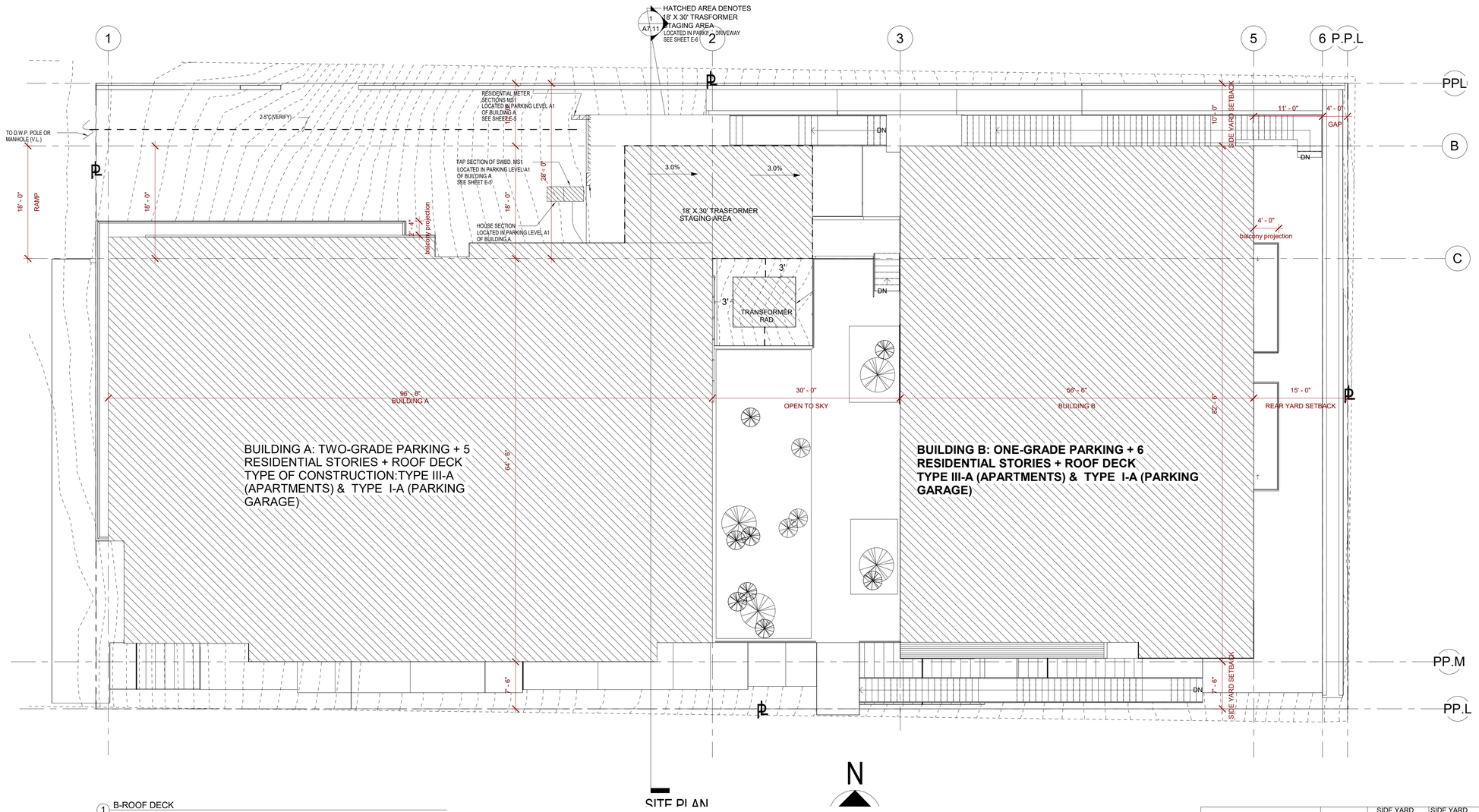
Ph: 818 770 0161 Email: farzin.maly@gmail.com

LICENSED ARCHITECT
FARZIN MALY
NO. C-33731
05-31-19
RENEWAL DATE
STATE OF CALIFORNIA

PROJECT NO: Project Number
DATE: 6/28/2021 10:42:53 AM
DRAWN BY: Author
APROVED BY: Approver

SHEET NO: A0.01



1 B-ROOF DECK
1/8" = 1'-0"

SITE PLAN

SETBACK	FRONT YARD	SIDE YARD SETBACK	SIDE YARD SETBACK	REAR YARD SETBACK
PROJECT SETBACK	_	5'-0"	5'-0"	15'-0"
PROJECT SETBACK	_	10'-0"	10'-0"	19'-0"
SETBACK 25% REDUCTION	_	10'-0" X 25%=7.6	_	19'-0" X 25%=14.6
	_	7'-6"	10'-0"	15'-0"

PLAN LEGEND

	PATH OF TRAVEL/ PATH OF EGRESS
	ACCESSIBLE PATH OF TRAVEL
	2x STUD WALL @ 16" O.C., REFER TO STRUCTURAL
	8" "CMU" WALL, REFER TO STRUCTURAL
	2-HOUR FIRE RATED WALL
	1-HOUR FIRE RATED WALL
	CONCRETE COLUMN / WALL. SEE STRUCTURAL.
	2x6 @ 16" O.C. PLUMBING WALL (NO SHEAR VALUE) REINFORCED TO SUIT GRAB BAR

EXIT	ILLUMINATED EXIT SIGN WITH DIRECTION ARROW	
	EXIT SIGN	
SD	SMOKE DETECTOR	- Fans shall be ENERGY STAR compliant and be ducted to terminate to the outside of the building. - Fans, not functioning as a component of a whole house ventilation system, must be controlled by a humidity control. i. Fans shall be ENERGY STAR compliant and be ducted to terminate to the outside of the building.
CM	CARBON MONOXIDE DETECTOR	
	EXHUAST FAN	
	CLASS ONE STAND PIPE	
	WATER CURTAIN	
	EV CHARGER	

ENERGY STAR NOTES:

ALL DISHWASHERS, THERMOSTATS, WASHER/DRYER AND REFIGERATORS SHALL BE ENERGY STAR - SEE SHEET A0.04.1

T	THERMOSTAT
DW	DISHWASHER
W/D	WASHERDRYER
FR.	REFRIGERATOR

NOTES:

1. FOR UNDER SLAB DRAINAGE SEE CIVIL & M/P DWG'S.
2. FOR AUTOMATIC SPRINKLER, SEE DWG'S. BY OTHERS. UNDER SEPARATE PERMIT.

EXHIBIT "A"
Page No. 2 of 16
Case No. DIR-2018-6634-TOC

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MALY ARCHITECTS INC.

REVISIONS	NO.	DATE:
1	1	
2	2	
3	3	

SHEET TITLE: SITE PLAN

OWNER AND PROJECT ADDRESS:
MICHAEL AMINPOUR
1251 Sunset Blvd, Los Angeles, CA 90026

ARCHITECT:
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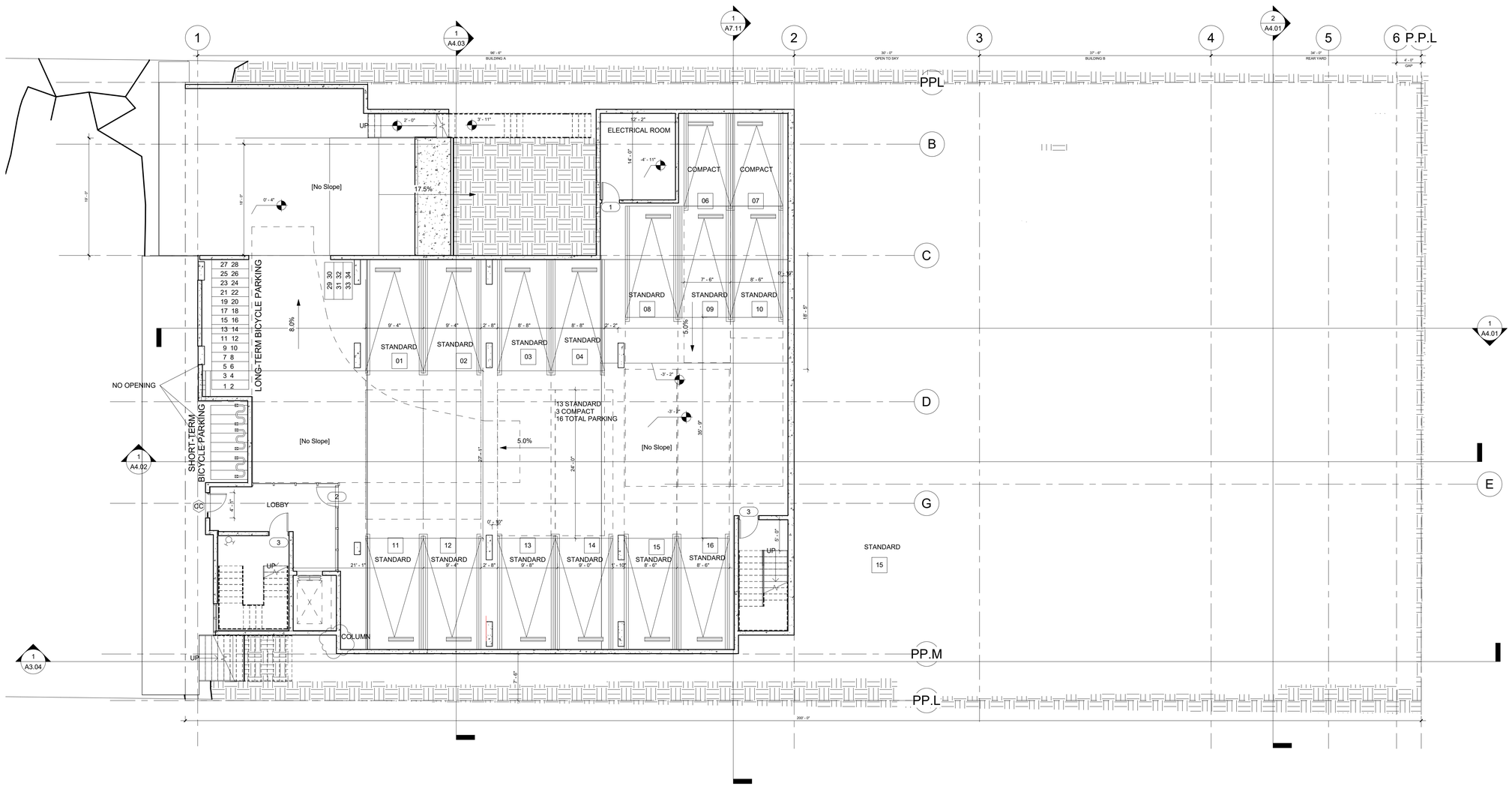
7136 Haskell Ave., #320
Van Nuys, CA 91406
Ph: 818 770 0161 Email: farzin.maly@gmail.com

LICENSED ARCHITECT FARZIN MALY NO. C-33731 05-31-19 RENEWAL DATE STATE OF CALIFORNIA

PROJECT NO: Project Number
DATE: 6/28/2021 10:50:13 AM
DRAWN BY: Author
APROVED BY: Approver

SHEET NO: A1.02



1 A-1ST FLOOR PLAN
1/8" = 1'-0"

PLAN LEGEND

PATH OF TRAVEL/ PATH OF EGRESS	EXIT	ILLUMINATED EXIT SIGN WITH DIRECTION ARROW
ACCESSIBLE PATH OF TRAVEL		EXIT SIGN
2x STUD WALL @ 16" O.C., REFER TO STRUCTURAL	SD	SMOKE DETECTOR
8" "CMU" WALL, REFER TO STRUCTURAL	CM	CARBON MONOXIDE DETECTOR
2-HOUR FIRE RATED WALL		EXHUAST FAN
1-HOUR FIRE RATED WALL		CLASS ONE STAND PIPE
CONCRETE COLUMN / WALL. SEE STRUCTURAL.		WATER CURTAIN
2x6 @ 16" O.C. PLUMBING WALL (NO SHEAR VALUE) REINFORCED TO SUIT GRAB BAR		EV CHARGER

- Fans shall be ENERGY STAR compliant and be ducted to terminate to the outside of the building.
- Fans, not functioning as a component of a whole house ventilation system, must be controlled by a humidity control. i. Fans shall be ENERGY STAR compliant and be ducted to terminate to the outside of the building.

ENERGY STAR NOTES:

ALL DISHWASHERS, THERMOSTATS, WASHER/DRYER AND REFIGERATORS SHALL BE ENERGY STAR - SEE SHEET A0.04.1

T	THERMOSTAT
DW	DISHWASHER
W/D	WASHERDRYER
FR.	REFRIGERATOR

NOTES:

1. FOR UNDER SLAB DRAINAGE SEE CIVIL & M/P DWG'S.
2. FOR AUTOMATIC SPRINKLER, SEE DWG'S. BY OTHERS. UNDER SEPARATE PERMIT.

EXHIBIT "A"
Page No. 3 of 16
Case No. DIR-2018-6634-TOC

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MALY ARCHITECTS INC.

REVISIONS	NO.	DATE:
1	1	
2	2	
3	3	

SHEET TITLE: A-1ST FLOOR PLAN

OWNER AND PROJECT ADDRESS:
MICHAEL AMINPOUR
1251 Sunset Blvd, Los Angeles, CA 90026

ARCHITECT:
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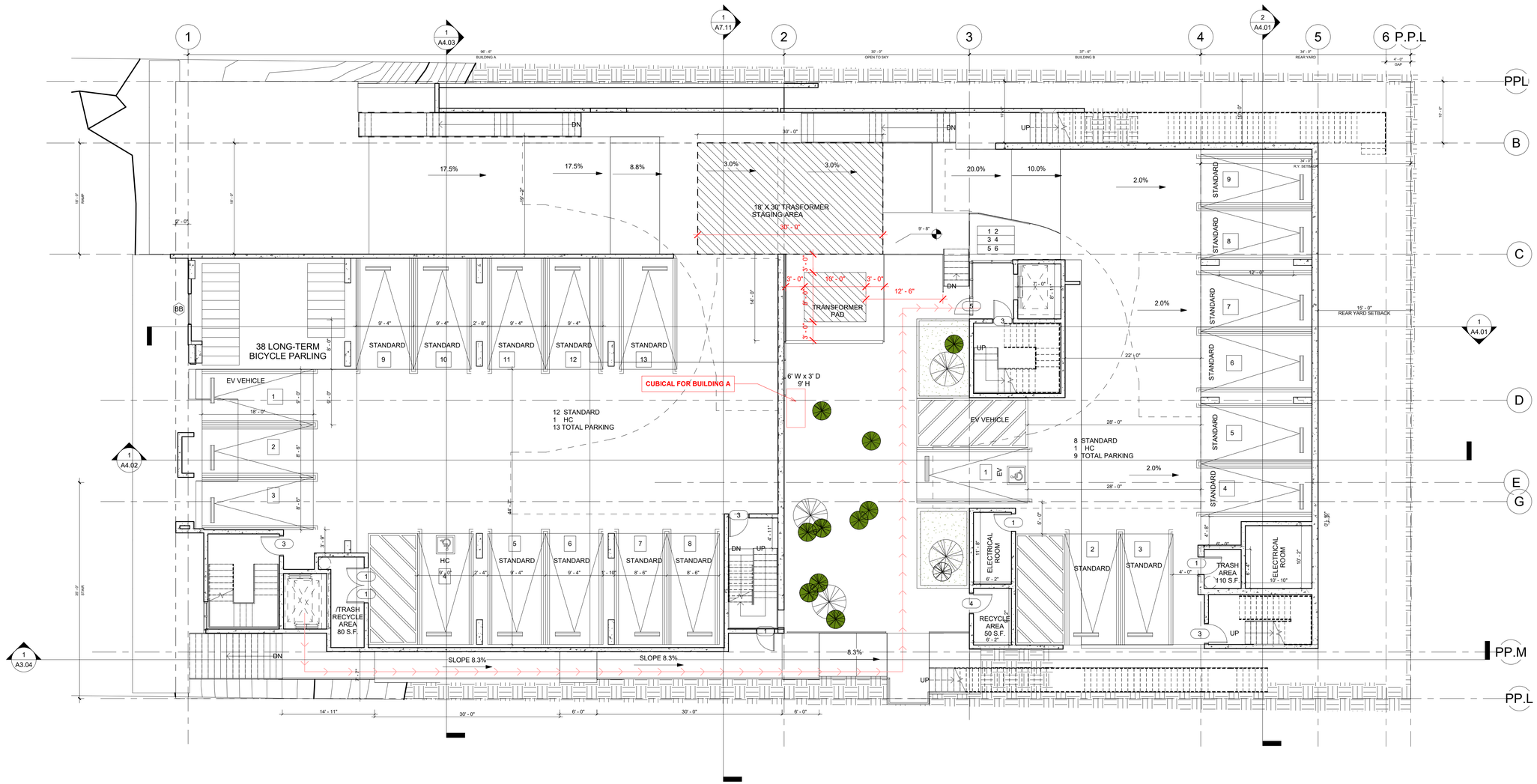
Ph: 818 770 0161 Email: farzin.maly@gmail.com

LICENSED ARCHITECT
FARZIN MALY
NO. C-33731
05-31-19
RENEWAL DATE
STATE OF CALIFORNIA

PROJECT NO: Project Number
DATE: 6/28/2021 10:50:14 AM
DRAWN BY: Author
APROVED BY: Approver

SHEET NO: A2.01



A 2ND FLOOR PLAN & B 1ST FLOOR PLAN
1/8" = 1'-0"

PLAN LEGEND

	PATH OF TRAVEL/ PATH OF EGRESS
	ACCESSIBLE PATH OF TRAVEL
	2x STUD WALL @ 16" O.C., REFER TO STRUCTURAL
	8" "CMU" WALL, REFER TO STRUCTURAL
	2-HOUR FIRE RATED WALL
	1-HOUR FIRE RATED WALL
	CONCRETE COLUMN / WALL. SEE STRUCTURAL.
	2x6 @ 16" O.C. PLUMBING WALL (NO SHEAR VALUE) REINFORCED TO SUIT GRAB BAR

EXIT	ILLUMINATED EXIT SIGN WITH DIRECTION ARROW	
	EXIT SIGN	
SD	SMOKE DETECTOR	- Fans shall be ENERGY STAR compliant and be ducted to terminate to the outside of the building. - Fans, not functioning as a component of a whole house ventilation system, must be controlled by a humidity control. i. Fans shall be ENERGY STAR compliant and be ducted to terminate to the outside of the building.
CM	CARBON MONOXIDE DETECTOR	
	EXHUAST FAN	
	CLASS ONE STAND PIPE	
	WATER CURTAIN	
	EV CHARGER	

ENERGY STAR NOTES:

ALL DISHWASHERS, THERMOSTATS, WASHER/DRYER AND REFIGERATORS SHALL BE ENERGY STAR - SEE SHEET A0.04.1

T	THERMOSTAT
DW	DISHWASHER
W/D	WASHERDRYER
FR.	REFRIGERATOR

NOTES:

1. FOR UNDER SLAB DRAINAGE SEE CIVIL & M/P DWG'S.
2. FOR AUTOMATIC SPRINKLER, SEE DWG'S. BY OTHERS. UNDER SEPARATE PERMIT.

EXHIBIT "A"
Page No. 4 of 16
Case No. DIR-2018-6634-TOC

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MALY ARCHITECTS INC.

REVISIONS	NO.	DATE:
1		
2		
3		

SHEET TITLE: A-2ND FLOOR PLAN & B-1ST FLOOR PLAN

OWNER AND PROJECT ADDRESS:
MICHAEL AMINPOUR
1251 Sunset Blvd, Los Angeles, CA 90026

ARCHITECT:
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7136 Haskell Ave., #320
Van Nuys, CA 91406
Ph: 818 770 0161 Email: farzin.maly@gmail.com

LICENSED ARCHITECT
FARZIN MALY
NO. C-33731
05-31-19
RENEWAL DATE
STATE OF CALIFORNIA

PROJECT NO: Project Number
DATE: 6/28/2021 10:50:16 AM
DRAWN BY: Author
APROVED BY: Approver

SHEET NO: A2.02

A 3RD FLOOR PLAN & B 2ND FLOOR PLAN
1/8" = 1'-0"

PLAN LEGEND

	PATH OF TRAVEL/ PATH OF EGRESS
	ACCESSIBLE PATH OF TRAVEL
	2x STUD WALL @ 16" O.C., REFER TO STRUCTURAL
	8" "CMU" WALL, REFER TO STRUCTURAL
	2-HOUR FIRE RATED WALL
	1-HOUR FIRE RATED WALL
	CONCRETE COLUMN / WALL. SEE STRUCTURAL.
	2x6 @ 16" O.C. PLUMBING WALL (NO SHEAR VALUE) REINFORCED TO SUIT GRAB BAR

EXIT	ILLUMINATED EXIT SIGN WITH DIRECTION ARROW
	EXIT SIGN
SD	SMOKE DETECTOR
CM	CARBON MONOXIDE DETECTOR
	EXHUAST FAN
	CLASS ONE STAND PIPE
	WATER CURTAIN
	EV CHARGER

- Fans shall be ENERGY STAR compliant and be ducted to terminate to the outside of the building.
- Fans, not functioning as a component of a whole house ventilation system, must be controlled by a humidity control.
i. Fans shall be ENERGY STAR compliant and be ducted to terminate to the outside of the building.

ENERGY STAR NOTES:

ALL DISHWASHERS, THERMOSTATS, WASHER/DRYER AND REFIGERATORS SHALL BE ENERGY STAR - SEE SHEET A0.04.1

T	THERMOSTAT
DW	DISHWASHER
W/D	WASHERDRYER
FR.	REFRIGERATOR

NOTES:

1. FOR UNDER SLAB DRAINAGE SEE CIVIL & M/P DWG'S.
2. FOR AUTOMATIC SPRINKLER, SEE DWG'S. BY OTHERS. UNDER SEPARATE PERMIT.

EXHIBIT "A"
Page No. 5 of 16
Case No. DIR-2018-6634-TOC

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MALY ARCHITECTS INC.

REVISIONS NO.	DATE:
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2	
3	

OWNER AND PROJECT ADDRESS:
MICHAEL AMINPOUR
1251 Sunset Blvd, Los Angeles, CA 90026

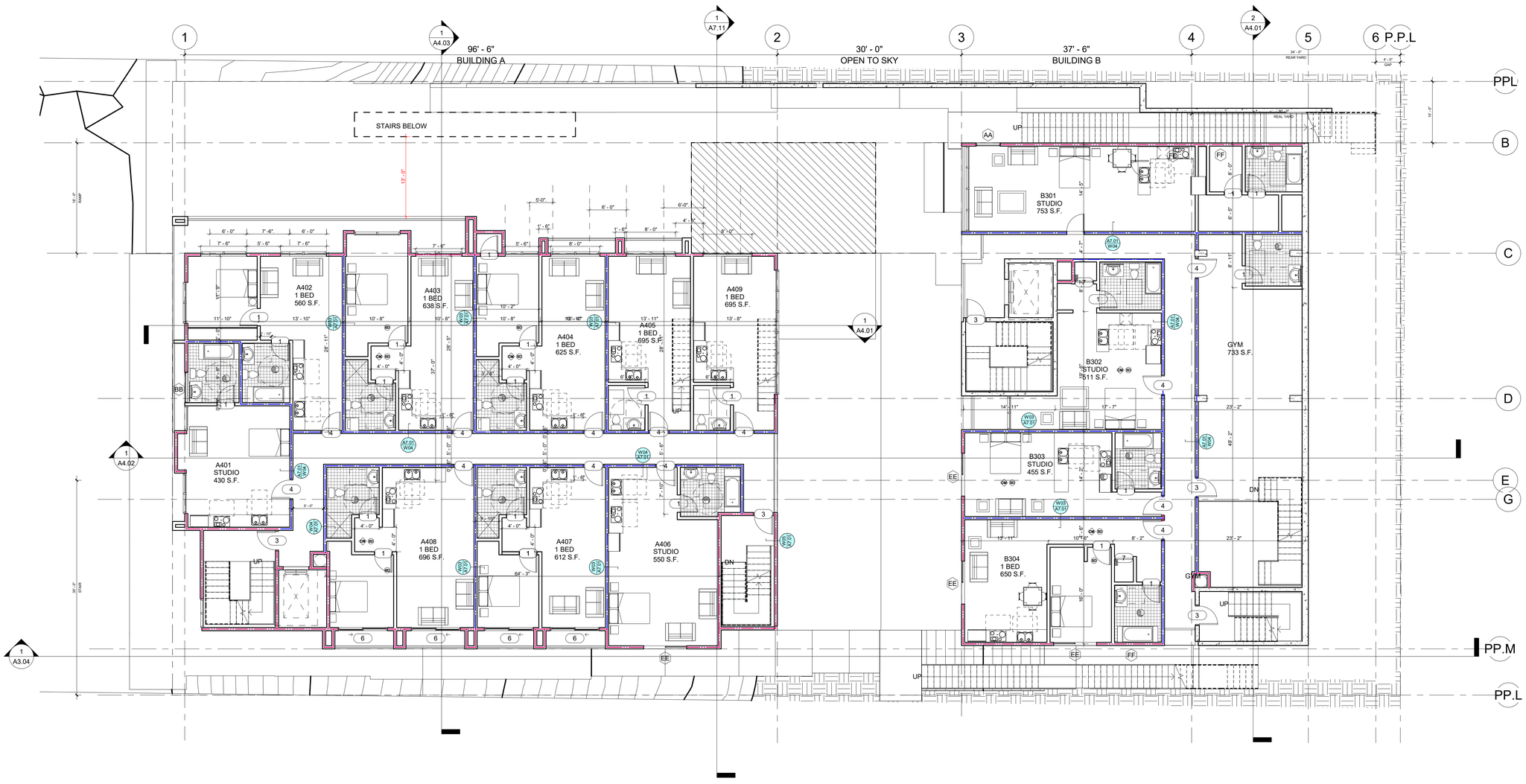
SHEET TITLE: A-3RD FLOOR PLAN & B-2ND FLOOR PLAN

ARCHITECT:
FARZIN MALY
7136 Haskell Ave., #320
Van Nuys, CA 91406
Ph: 818 770 0161 Email: farzin.maly@gmail.com

LICENSED ARCHITECT
FARZIN MALY
NO. C-33731
05-31-19
RENEWAL DATE
STATE OF CALIFORNIA

PROJECT NO: Project Number
DATE: 6/28/2021 10:50:18 AM
DRAWN BY: Author
APROVED BY: Approver

SHEET NO:
A2.03



A 4TH FLOOR PLAN & B 3RD FLOOR PLAN
1/8" = 1'-0"

PLAN LEGEND

	PATH OF TRAVEL/ PATH OF EGRESS
	ACCESSIBLE PATH OF TRAVEL
	2x STUD WALL @ 16" O.C., REFER TO STRUCTURAL
	8" "CMU" WALL, REFER TO STRUCTURAL
	2-HOUR FIRE RATED WALL
	1-HOUR FIRE RATED WALL
	CONCRETE COLUMN / WALL. SEE STRUCTURAL.
	2x6 @ 16" O.C. PLUMBING WALL (NO SHEAR VALUE) REINFORCED TO SUIT GRAB BAR

EXIT	ILLUMINATED EXIT SIGN WITH DIRECTION ARROW
	EXIT SIGN
SD	SMOKE DETECTOR
CM	CARBON MONOXIDE DETECTOR
	EXHUAST FAN
	CLASS ONE STAND PIPE
	WATER CURTAIN
	EV CHARGER

- Fans shall be ENERGY STAR compliant and be ducted to terminate to the outside of the building.
- Fans, not functioning as a component of a whole house ventilation system, must be controlled by a humidity control.
i. Fans shall be ENERGY STAR compliant and be ducted to terminate to the outside of the building.

ENERGY STAR NOTES:

ALL DISHWASHERS, THERMOSTATS, WASHER/DRYER AND REFIGERATORS SHALL BE ENERGY STAR - SEE SHEET A0.04.1

T	THERMOSTAT
DW	DISHWASHER
W/D	WASHERDRYER
FR.	REFRIGERATOR

NOTES:

1. FOR UNDER SLAB DRAINAGE SEE CIVIL & M/P DWG'S.
2. FOR AUTOMATIC SPRINKLER, SEE DWG'S. BY OTHERS. UNDER SEPARATE PERMIT.

EXHIBIT "A"
Page No. 6 of 16
Case No. DIR-2018-6634-TOC

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MALY ARCHITECTS INC.

REVISIONS	NO.	DATE:
1	1	
2	2	
3	3	

SHEET TITLE: A-4TH FLOOR PLAN & B-3RD FLOOR PLAN

OWNER AND PROJECT ADDRESS:
MICHAEL AMINPOUR
1251 Sunset Blvd, Los Angeles, CA 90026

ARCHITECT:
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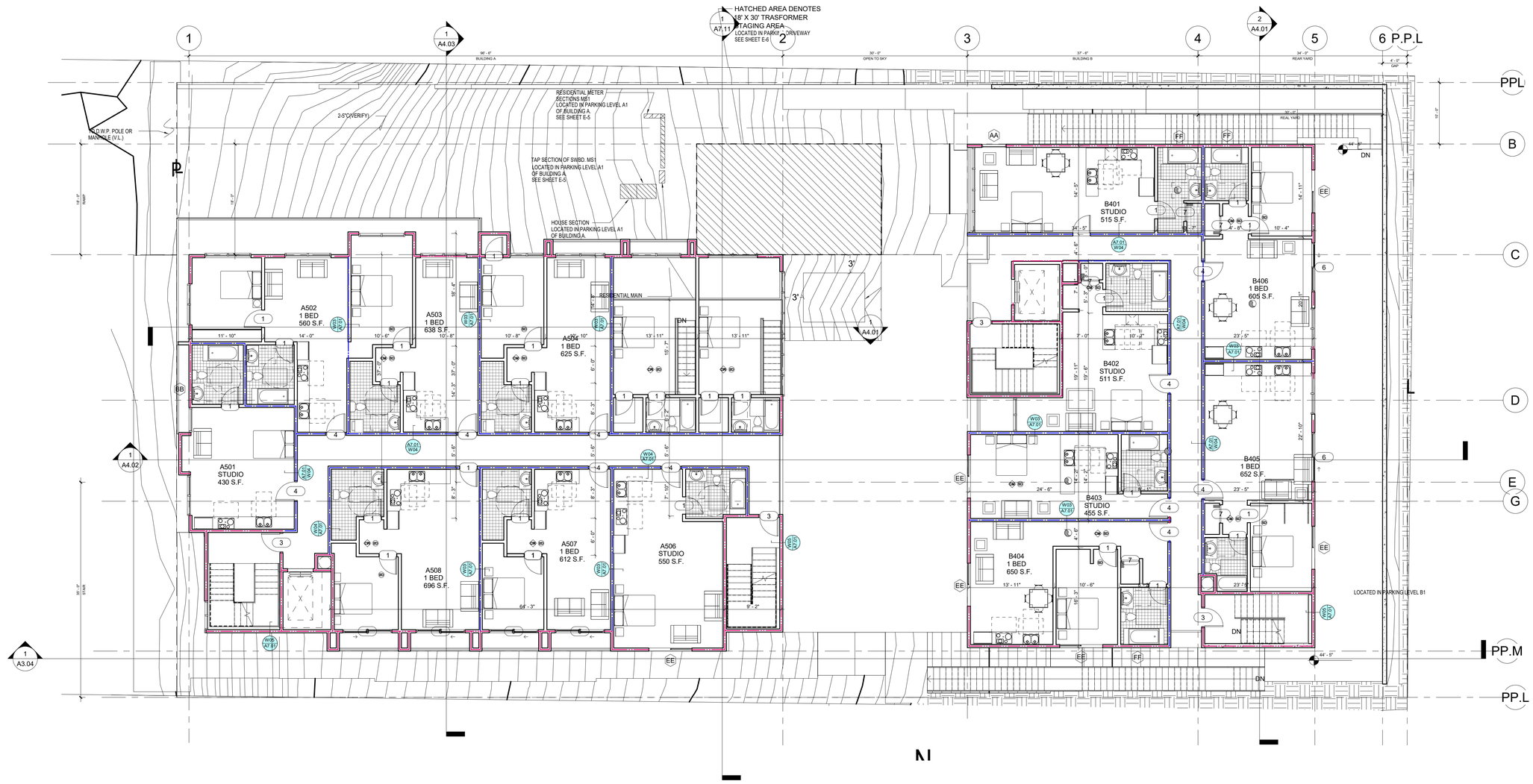
7136 Haskell Ave., #320
Van Nuys, CA 91406
Ph: 818 770 0161 Email: farzin.maly@gmail.com

LICENSED ARCHITECT
FARZIN MALY
NO. C-33731
05-31-19
RENEWAL DATE
STATE OF CALIFORNIA

PROJECT NO: Project Number
DATE: 6/28/2021 10:50:22 AM
DRAWN BY: Author
APROVED BY: Approver

SHEET NO: A2.04



A-5TH FLOOR PLAN & B-4TH FLOOR PLAN
1/8" = 1'-0"

PLAN LEGEND

	PATH OF TRAVEL/ PATH OF EGRESS
	ACCESSIBLE PATH OF TRAVEL
	2x STUD WALL @ 16" O.C., REFER TO STRUCTURAL
	8" "CMU" WALL, REFER TO STRUCTURAL
	2-HOUR FIRE RATED WALL
	1-HOUR FIRE RATED WALL
	CONCRETE COLUMN / WALL. SEE STRUCTURAL.
	2x6 @ 16" O.C. PLUMBING WALL (NO SHEAR VALUE) REINFORCED TO SUIT GRAB BAR

EXIT	ILLUMINATED EXIT SIGN WITH DIRECTION ARROW	
	EXIT SIGN	
SD	SMOKE DETECTOR	- Fans shall be ENERGY STAR compliant and be ducted to terminate to the outside of the building. - Fans, not functioning as a component of a whole house ventilation system, must be controlled by a humidity control. i. Fans shall be ENERGY STAR compliant and be ducted to terminate to the outside of the building.
CM	CARBON MONOXIDE DETECTOR	
	EXHUAST FAN	
	CLASS ONE STAND PIPE	
	WATER CURTAIN	
	EV CHARGER	

ENERGY STAR NOTES:

ALL DISHWASHERS, THERMOSTATS, WASHER/DRYER AND REFIGERATORS SHALL BE ENERGY STAR - SEE SHEET A0.04.1

T	THERMOSTAT
DW	DISHWASHER
W/D	WASHERDRYER
FR.	REFRIGERATOR

NOTES:

1. FOR UNDER SLAB DRAINAGE SEE CIVIL & M/P DWG'S.
2. FOR AUTOMATIC SPRINKLER, SEE DWG'S. BY OTHERS. UNDER SEPARATE PERMIT.

EXHIBIT "A"
Page No. 7 of 16
Case No. DIR-2018-6634-TOC

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REVISIONS NO.	DATE:
1	
2	
3	

MALY ARCHITECTS INC.

OWNER AND PROJECT ADDRESS:
MICHAEL AMINPOUR
1251 Sunset Blvd, Los Angeles, CA 90026

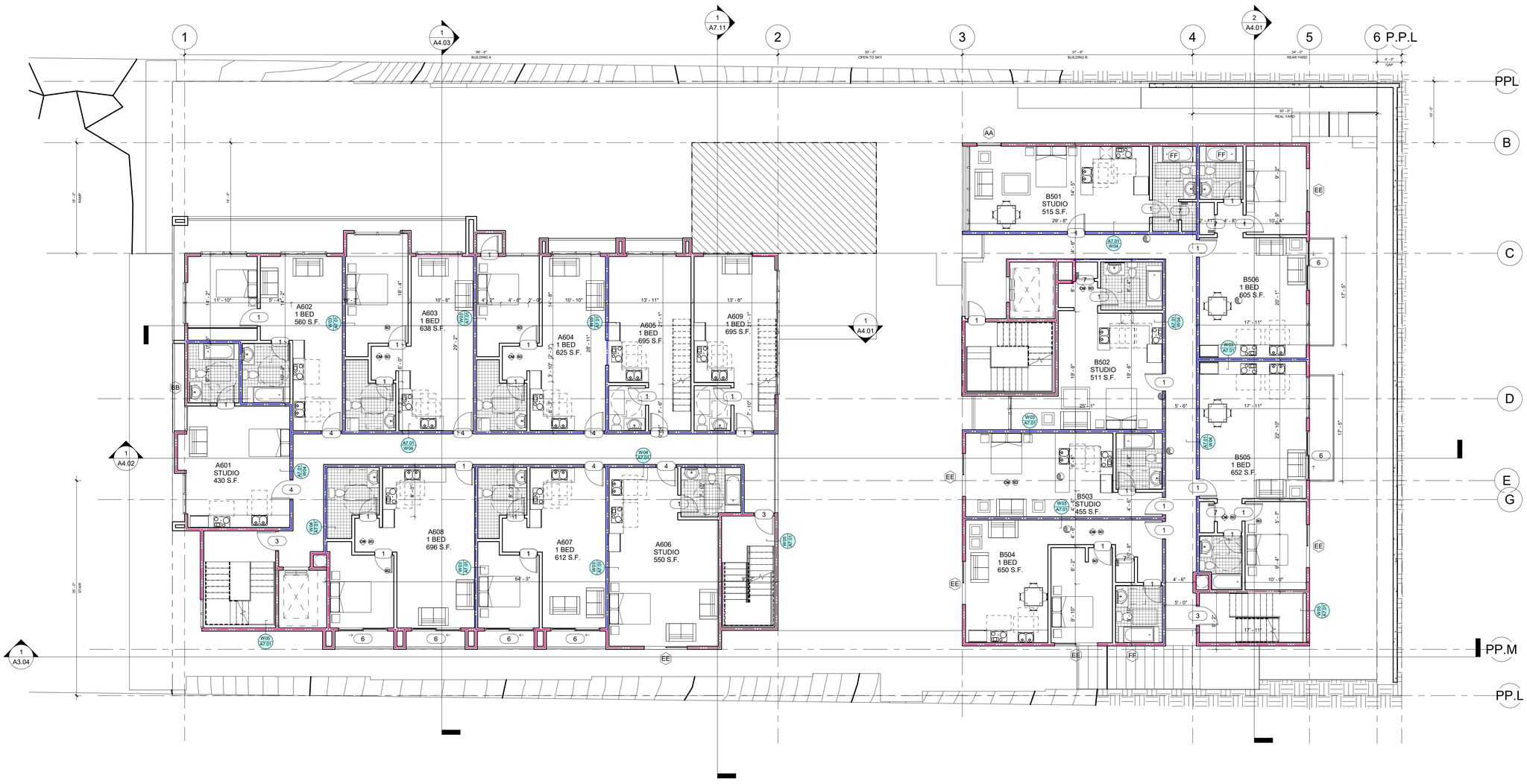
ARCHITECT:
FARZIN MALY
7136 Haskell Ave., #320
Van Nuys, CA 91406
Ph: 818 770 0161 Email: farzin.maly@gmail.com

SHEET TITLE: A-5TH FLOOR PLAN & B-4TH FLOOR PLAN

LICENSED ARCHITECT
FARZIN MALY
NO. C-33731
05-31-19
RENEWAL DATE
STATE OF CALIFORNIA

PROJECT NO: Project Number
DATE: 6/28/2021 10:50:25 AM
DRAWN BY: Author
APROVED BY: Approver

SHEET NO: A2.05



A-6TH FLOOR PLAN & B-5TH FLOOR PLAN
1/8" = 1'-0"

PLAN LEGEND

- PATH OF TRAVEL/ PATH OF EGRESS
- ACCESSIBLE PATH OF TRAVEL
- 2x STUD WALL @ 16" O.C., REFER TO STRUCTURAL
- 8" "CMU" WALL, REFER TO STRUCTURAL
- 2-HOUR FIRE RATED WALL
- 1-HOUR FIRE RATED WALL
- CONCRETE COLUMN / WALL. SEE STRUCTURAL.
- 2x6 @ 16" O.C. PLUMBING WALL (NO SHEAR VALUE) REINFORCED TO SUIT GRAB BAR

- EXIT — ILLUMINATED EXIT SIGN WITH DIRECTION ARROW
- EXIT SIGN
- SD — SMOKE DETECTOR
- CM — CARBON MONOXIDE DETECTOR
- EXHUAST FAN — - Fans shall be ENERGY STAR compliant and be ducted to terminate to the outside of the building. - Fans, not functioning as a component of a whole house ventilation system, must be controlled by a humidity control. i. Fans shall be ENERGY STAR compliant and be ducted to terminate to the outside of the building.
- CLASS ONE STAND PIPE
- WATER CURTAIN
- EV CHARGER

ENERGY STAR NOTES:

ALL DISHWASHERS, THERMOSTATS, WASHER/DRYER AND REFIGERATORS SHALL BE ENERGY STAR - SEE SHEET A0.04.1

- T — THERMOSTAT
- DW — DISHWASHER
- W/D — WASHERDRYER
- FR. — REFRIGERATOR

NOTES:

1. FOR UNDER SLAB DRAINAGE SEE CIVIL & M/P DWG'S.
2. FOR AUTOMATIC SPRINKLER, SEE DWG'S. BY OTHERS. UNDER SEPARATE PERMIT.

EXHIBIT "A"
Page No. 8 of 16
Case No. DIR-2018-6634-TOC

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MALY ARCHITECTS INC.

REVISIONS	NO.	DATE:
	1	
	2	
	3	

OWNER AND PROJECT ADDRESS:
MICHAEL AMINPOUR
1251 Sunset Blvd, Los Angeles, CA 90026

SHEET TITLE: A-6TH FLOOR PLAN & B-5TH FLOOR PLAN

ARCHITECT:
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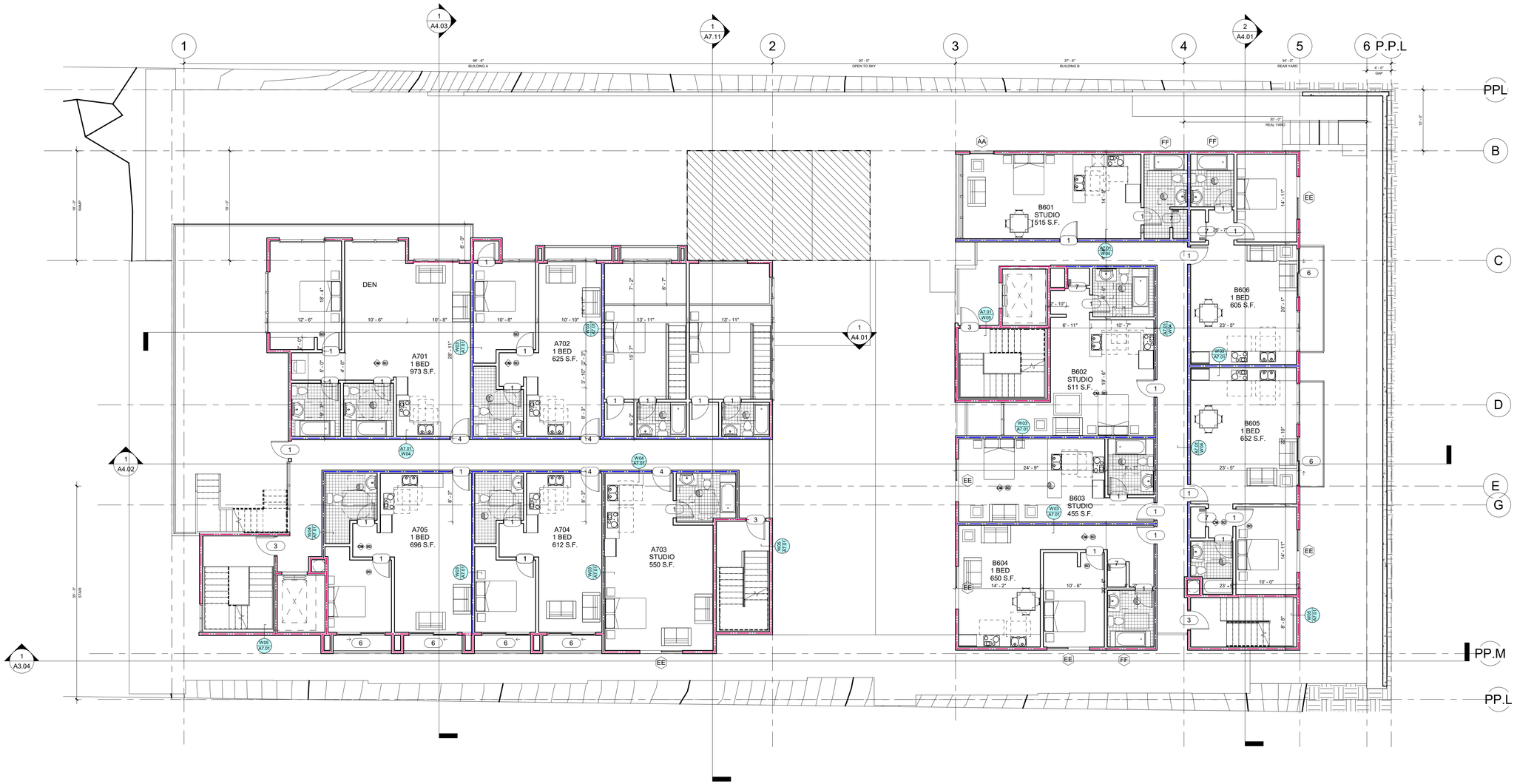
Ph: 818 770 0161 Email: farzin.maly@gmail.com

LICENSED ARCHITECT
FARZIN MALY
NO. C-33731
05-31-19
RENEWAL DATE
STATE OF CALIFORNIA

PROJECT NO: Project Number
DATE: 6/28/2021 10:50:29 AM
DRAWN BY: Author
APROVED BY: Approver

SHEET NO:
A2.06



1 A-7TH FLOOR PLAN & B-6TH FLOOR PLAN
1/8" = 1'-0"

PLAN LEGEND

	PATH OF TRAVEL/ PATH OF EGRESS
	ACCESSIBLE PATH OF TRAVEL
	2x STUD WALL @ 16" O.C., REFER TO STRUCTURAL
	8" "CMU" WALL, REFER TO STRUCTURAL
	2-HOUR FIRE RATED WALL
	1-HOUR FIRE RATED WALL
	CONCRETE COLUMN / WALL. SEE STRUCTURAL.
	2x6 @ 16" O.C. PLUMBING WALL (NO SHEAR VALUE) REINFORCED TO SUIT GRAB BAR

EXIT	ILLUMINATED EXIT SIGN WITH DIRECTION ARROW	
	EXIT SIGN	
SD	SMOKE DETECTOR	- Fans shall be ENERGY STAR compliant and be ducted to terminate to the outside of the building.
CM	CARBON MONOXIDE DETECTOR	- Fans, not functioning as a component of a whole house ventilation system, must be controlled by a humidity control. I. Fans shall be ENERGY STAR compliant and be ducted to terminate to the outside of the building.
	EXHUAST FAN	
	CLASS ONE STAND PIPE	
	WATER CURTAIN	
	EV CHARGER	

ENERGY STAR NOTES:

ALL DISHWASHERS, THERMOSTATS, WASHER/DRYER AND REFIGERATORS SHALL BE ENERGY STAR - SEE SHEET A0.04.1

T	THERMOSTAT
DW	DISHWASHER
W/D	WASHERDRYER
FR.	REFRIGERATOR

NOTES:

1. FOR UNDER SLAB DRAINAGE SEE CIVIL & M/P DWG'S.
2. FOR AUTOMATIC SPRINKLER, SEE DWG'S. BY OTHERS. UNDER SEPARATE PERMIT.

EXHIBIT "A"
Page No. 9 of 16
Case No. DIR-2018-6634-TOC

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MALY ARCHITECTS INC.

NO.	DATE:
1	
2	
3	

REVISIONS

SHEET TITLE: A-7TH FLOOR PLAN & B-6TH FLOOR PLAN

OWNER AND PROJECT ADDRESS:
MICHAEL AMINPOUR
1251 Sunset Blvd, Los Angeles, CA 90026

ARCHITECT:
FARZIN MALY
7136 Haskell Ave., #320
Van Nuys, CA 91406
Ph: 818 770 0161 Email: farzin.maly@gmail.com

LICENSED ARCHITECT
FARZIN MALY
NO. C-33731
05-31-19
RENEWAL DATE
STATE OF CALIFORNIA

PROJECT NO: Project Number
DATE: 6/28/2021 10:50:33 AM
DRAWN BY: Author
APROVED BY: Approver

SHEET NO:
A2.07

1 ROOF DECK A
1/8" = 1'-0"

PLAN LEGEND

	PATH OF TRAVEL/ PATH OF EGRESS
	ACCESSIBLE PATH OF TRAVEL
	2x STUD WALL @ 16" O.C., REFER TO STRUCTURAL
	8" "CMU" WALL, REFER TO STRUCTURAL
	2-HOUR FIRE RATED WALL
	1-HOUR FIRE RATED WALL
	CONCRETE COLUMN / WALL. SEE STRUCTURAL.
	2x6 @ 16" O.C. PLUMBING WALL (NO SHEAR VALUE) REINFORCED TO SUIT GRAB BAR

EXIT	ILLUMINATED EXIT SIGN WITH DIRECTION ARROW	
	EXIT SIGN	
SD	SMOKE DETECTOR	- Fans shall be ENERGY STAR compliant and be ducted to terminate to the outside of the building. - Fans, not functioning as a component of a whole house ventilation system, must be controlled by a humidity control. i. Fans shall be ENERGY STAR compliant and be ducted to terminate to the outside of the building.
CM	CARBON MONOXIDE DETECTOR	
	EXHUAST FAN	
	CLASS ONE STAND PIPE	
	WATER CURTAIN	
	EV CHARGER	

ENERGY STAR NOTES:

ALL DISHWASHERS, THERMOSTATS, WASHER/DRYER AND REFIGERATORS SHALL BE ENERGY STAR - SEE SHEET A0.04.1

T	THERMOSTAT
DW	DISHWASHER
W/D	WASHERDRYER
FR.	REFRIGERATOR

NOTES:

1. FOR UNDER SLAB DRAINAGE SEE CIVIL & M/P DWG'S.
2. FOR AUTOMATIC SPRINKLER, SEE DWG'S. BY OTHERS. UNDER SEPARATE PERMIT.

EXHIBIT "A"
Page No. 10 of 16
Case No. DIR-2018-6634-TOC

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MALY ARCHITECTS INC.

REVISIONS	NO.	DATE:
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3	3	

SHEET TITLE: A-ROOF DECK PLAN & B-7TH FLOOR PLAN

OWNER AND PROJECT ADDRESS:
MICHAEL AMINPOUR
1251 Sunset Blvd, Los Angeles, CA 90026

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LICENSED ARCHITECT
FARZIN MALY
NO. C-33731
05-31-19
RENEWAL DATE
STATE OF CALIFORNIA

PROJECT NO: Project Number
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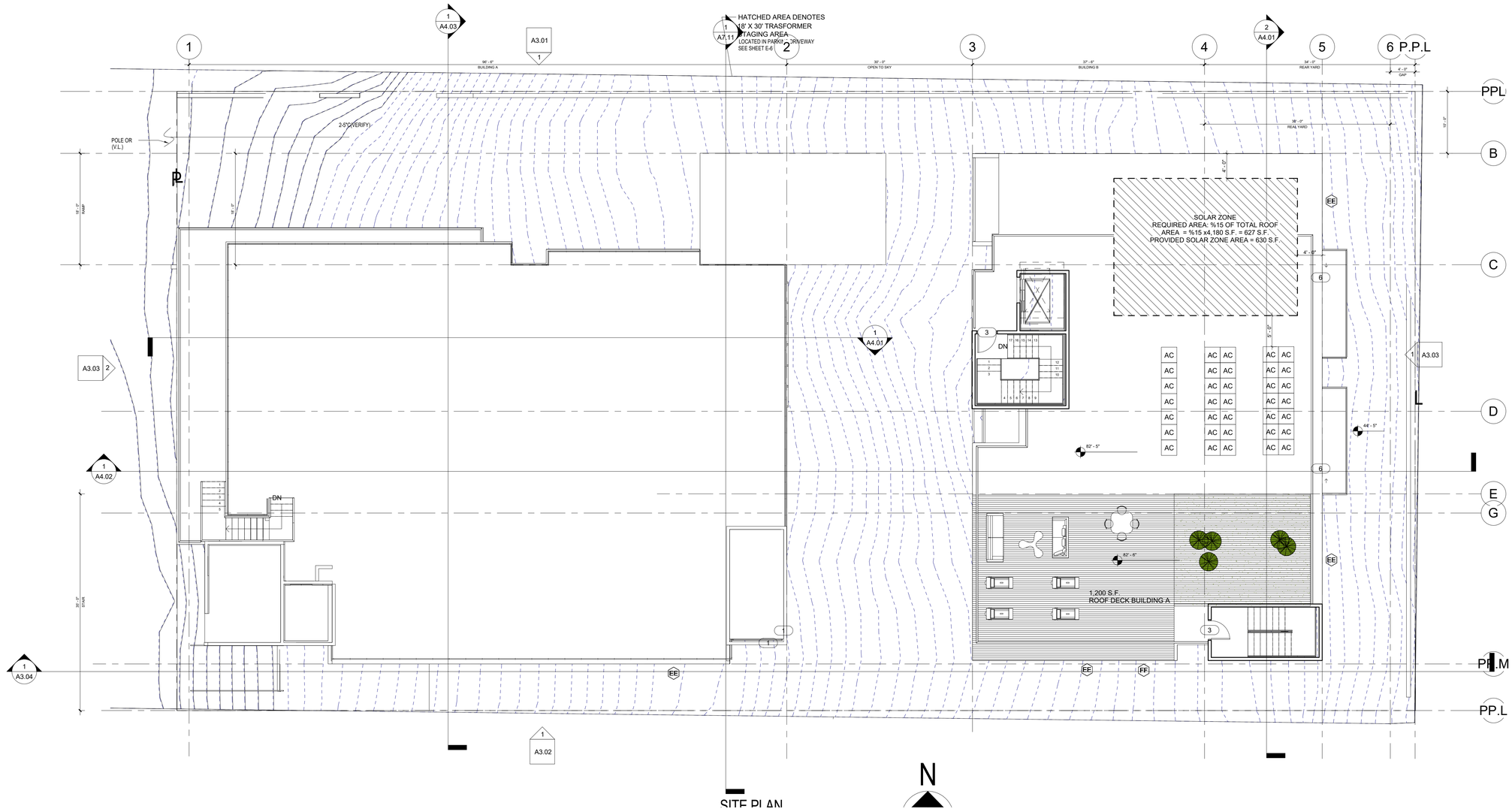

1 B-ROOF DECK
1/8" = 1'-0"

EXHIBIT "A"
Page No. 11 of 16
Case No. DIR-2018-6634-TOC

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NO.	DATE:
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MALY ARCHITECTS INC.

OWNER AND PROJECT ADDRESS:
MICHAEL AMINPOUR
1251 Sunset Blvd, Los Angeles, CA 90026

SHEET TITLE: B-ROOF DECK

ARCHITECT:
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LICENSED ARCHITECT
FARZIN MALY
NO. C-33731
05-31-19
RENEWAL DATE
STATE OF CALIFORNIA

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APROVED BY: Approver

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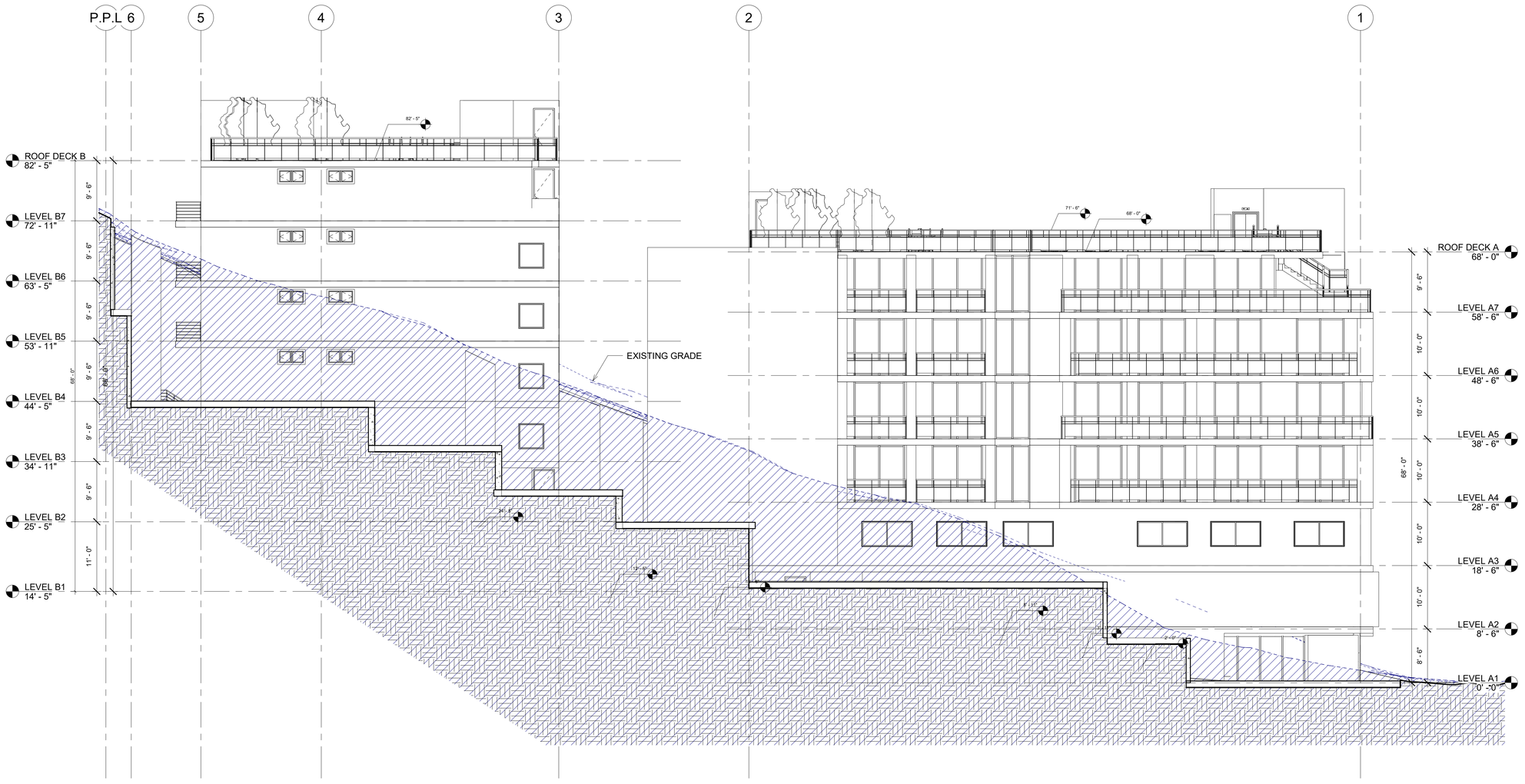

1 NORTH ELEVATION
1/8" = 1'-0"

EXHIBIT "A"
Page No. 12 of 16
Case No. DIR-2018-6634-TOC

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MALY ARCHITECTS INC.

REVISIONS	NO.	DATE:
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3		

SHEET TITLE: NORTH ELEVATION

OWNER AND PROJECT ADDRESS:
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LICENSED ARCHITECT
FARZIN MALY
NO. C-33731
05-31-19
RENEWAL DATE
STATE OF CALIFORNIA

PROJECT NO: Project Number
DATE: 6/28/2021 10:43:44 AM
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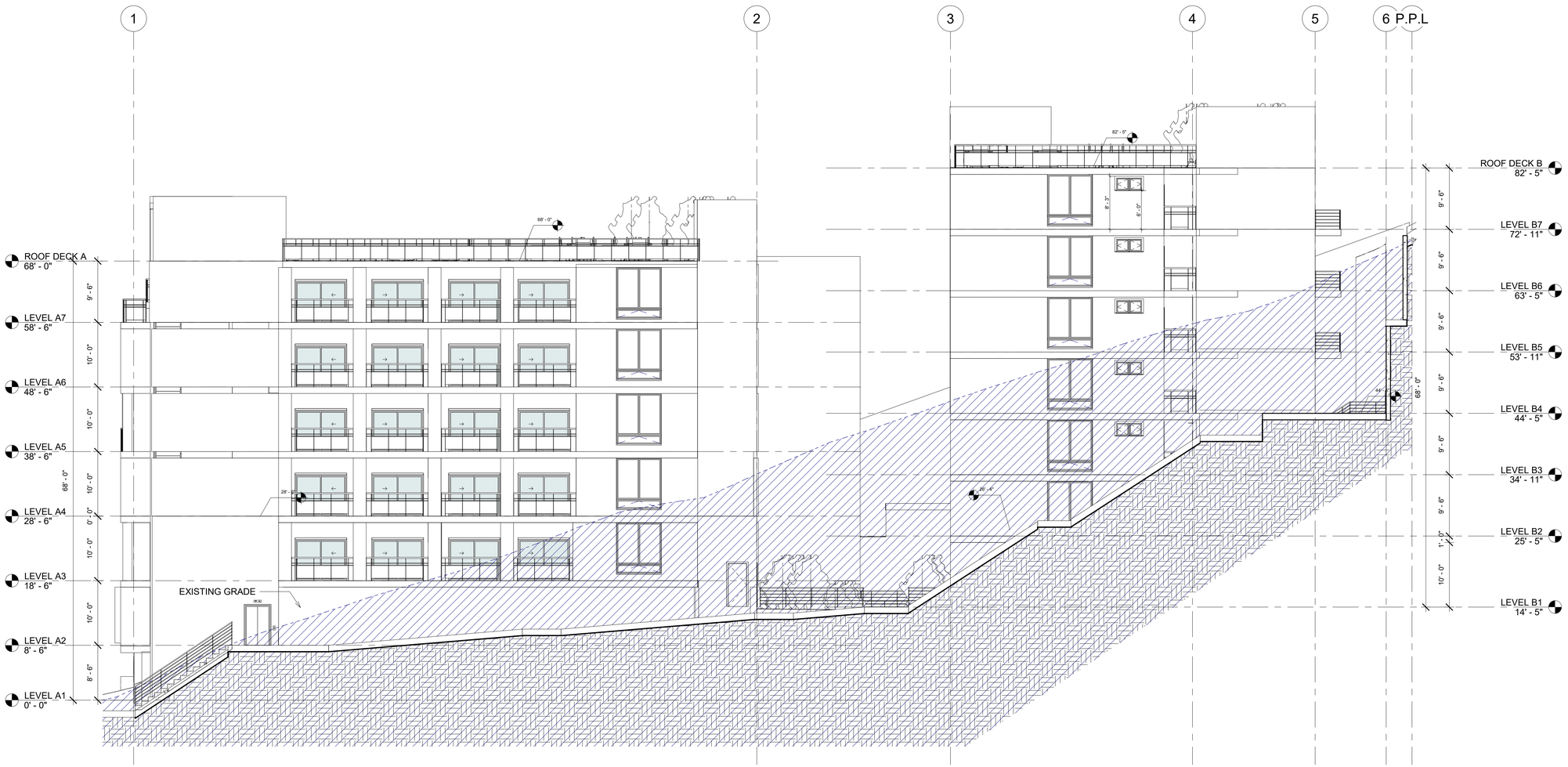
APROVED BY: Approver

SHEET NO:
A3.01



1 SOUTH ELEVATION
1/8" = 1'-0"

EXHIBIT "A"
Page No. 13 of 16
Case No. DIR-2018-6634-TOC

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MALY ARCHITECTS INC.

REVISIONS	NO.	DATE:
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SHEET TITLE: SOUTH ELEVATION

OWNER AND PROJECT ADDRESS:
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1251 Sunset Blvd, Los Angeles, CA 90026

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LICENSED ARCHITECT
FARZIN MALY
NO. C-33731
05-31-19
RENEWAL DATE
STATE OF CALIFORNIA

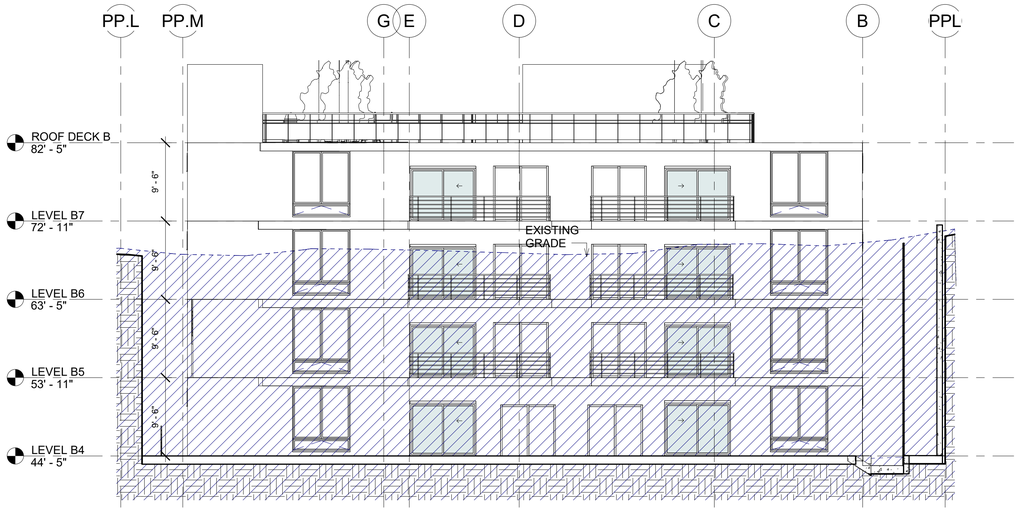
PROJECT NO:
Project Number

DATE:
6/28/2021 10:43:56 AM

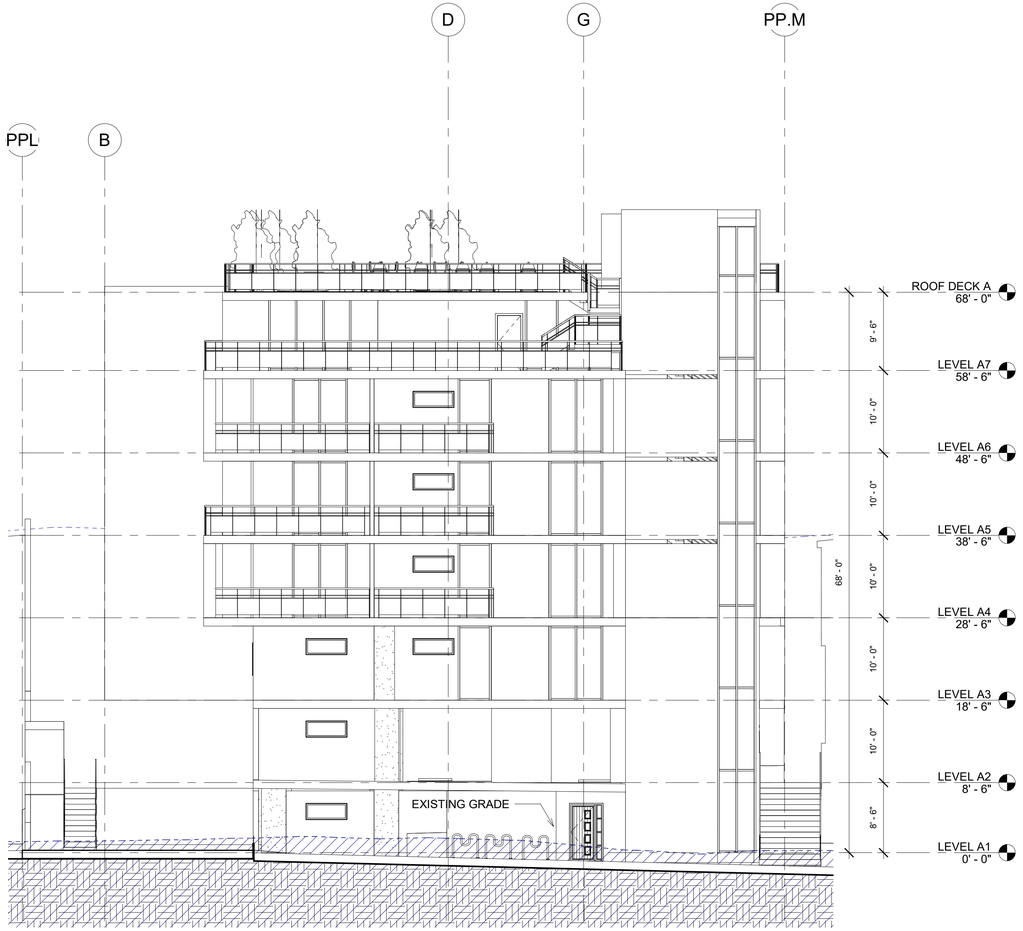
DRAWN BY:
Author

APROVED BY:
Approver

SHEET NO:
A3.02



1 EAST ELEVATION
1/8" = 1'-0"



2 WEST ELEVATION
1/8" = 1'-0"

EXHIBIT "A"
Page No. 14 of 16
Case No. DIR-2018-6634-TOC

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MALY ARCHITECTS INC.

REVISIONS	NO.	DATE:
	1	
	2	
	3	

SHEET TITLE: EAST & WEST ELEVATION

OWNER AND PROJECT ADDRESS:
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LICENSED ARCHITECT
FARZIN MALY
NO. C-33731
05-31-19
RENEWAL DATE
STATE OF CALIFORNIA

PROJECT NO:
Project Number

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Author

APROVED BY:
Approver

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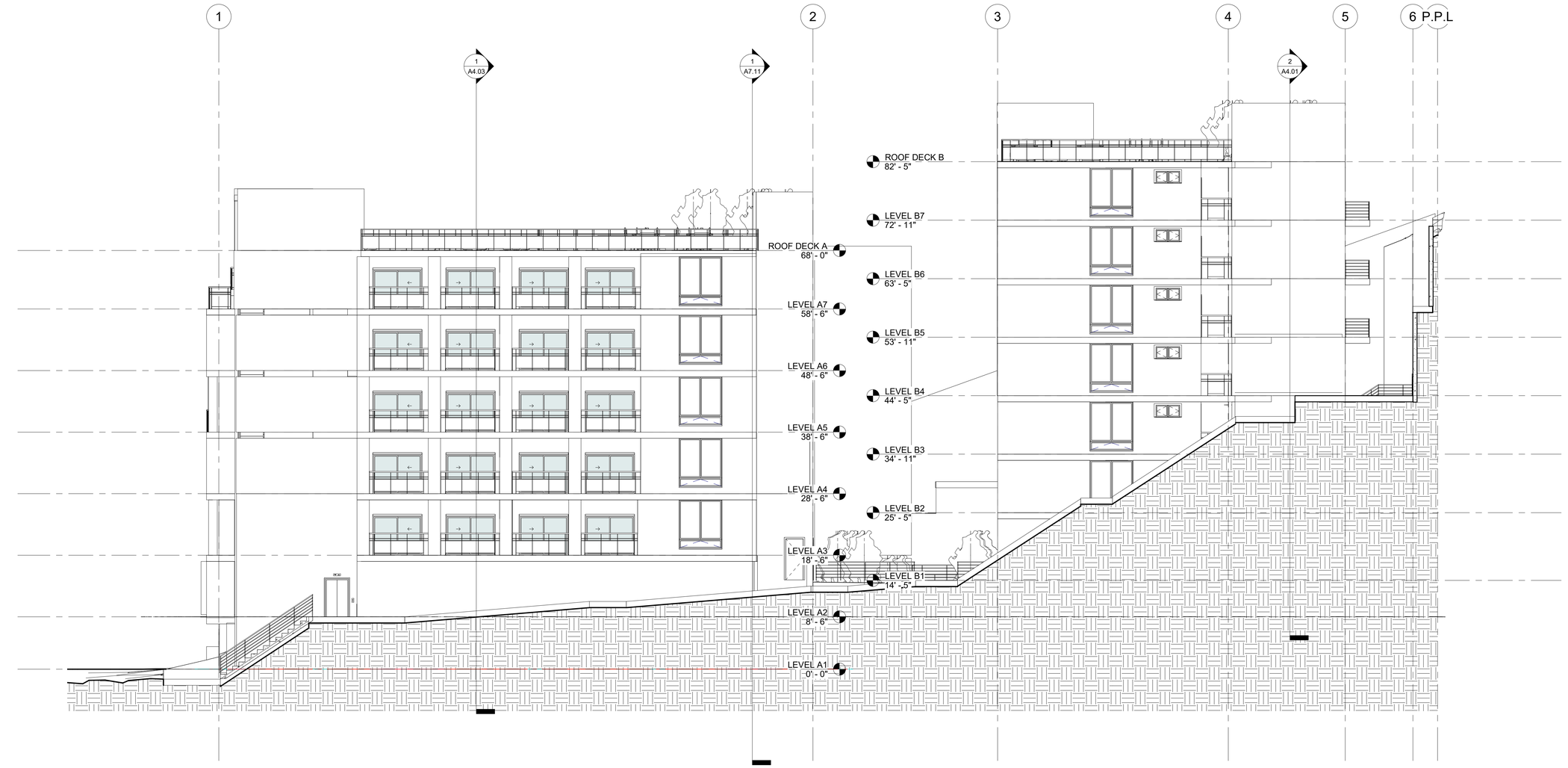
A3.03



1 Section 7
1/8" = 1'-0"

EXHIBIT "A"
Page No. 15 of 16
Case No. DIR-2018-6634-TOC

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MALY ARCHITECTS INC.

REVISIONS	NO.	DATE:
1		
2		
3		

SHEET TITLE: COURTYARD ELEVATIONS

OWNER AND PROJECT ADDRESS:
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ARCHITECT:
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LICENSED ARCHITECT
FARZIN MALY
NO. C-33731
05-31-19
RENEWAL DATE
STATE OF CALIFORNIA

PROJECT NO: Project Number
DATE: 6/28/2021 10:44:03 AM
DRAWN BY: Author
APROVED BY: Approver

SHEET NO:
A3.04

Door Schedule									
	Room	Quantity	Type	Width	Height	Thickness	Material	Fire Rating	Description
1	Bath and Bedroom	166	Single Leaf	2' - 10"	6' - 8"	0' - 2"	WOOD		
2		2							
3	Fire Exit Stair	33		3' - 0"	8' - 0"	0' - 2"		90 Mins	S Rated; Self Closing or Draft Stop Assembly, SPC Rating:26
4	Unit Entrance Door	46		3' - 0"	8' - 0"	0' - 2"		20 Mins	S Rated; Self Closing or Draft Stop Assembly, SPC Rating:26
5	Building Entrance B	1		2' - 7"	9' - 7"				
6	Balcony	28	Single Leaf, Sliding	8' - 0"	6' - 8"	0' - 2"	GLASS		
7	Closet	24		3' - 0"	7' - 8"				

NOTE: ALL DOORS SHALL BE SEALED TOP AND BOTTOM, SELECTED BY OWNER, CONTRACTOR INSTALLED.

Window Schedule					
Number	Room	Quantity	Width	Height	Description
AA	4' x 4'	4	4' - 0"	4' - 0"	fixed window
BB	5' x 2'	7	5' - 0"	2' - 0"	
CC	Lobby Door+Window	1	4' - 0"	7' - 0"	
EE	7' x 8'	31	7' - 0"	8' - 0"	Fixed Window over Awning Window
FF	4' x 2'	15	4' - 0"	2' - 0"	
GG	8' x 4'	7	8' - 0"	4' - 0"	

NOTE: ALL NEW WINDOWS SHALL BE DUAL GLAZED ALUM. FRAME WINDOWS U=0.87 MIN., SELECTED BY OWNER, CONTRACTOR INSTALLED. WINDOWS SHALL MEET EGRESS REQUIREMENTS SECTION (CBC 310.4).

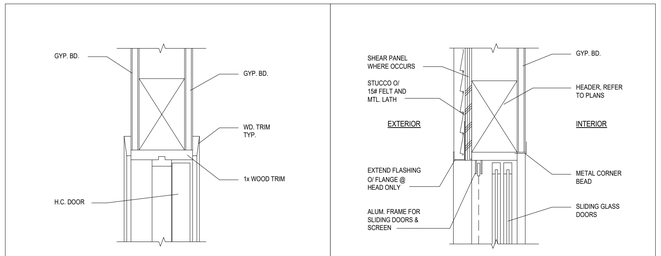
EXHIBIT "A"
Page No. 16 of 16
Case No. DIR-2018-6634-TOC

DOOR AND WINDOW NOTES

1. ALL GLASS WITHIN 18" OF THE FINISHED FLOOR SHALL BE FULLY TEMPERED.
2. ALL EGRESS OR RESCUE WINDOWS FROM SLEEPING ROOMS SHALL BE PROVIDED WITH A MINIMUM CLEAR OPENING OF 5.7 SQUARE FEET WITH THE MINIMUM NET WIDTH DIMENSION OF THE OPENING NOT LESS THAN 20'. WHERE WINDOWS ARE PROVIDED AS A MEANS OF EGRESS OR RESCUE. THEY SHALL HAVE A FINISHED SILL HEIGHT OF NOT MORE THAN 44" ABOVE THE ADJACENT FINISHED FLOOR.
3. ALL EXTERIOR DOORS AND WINDOWS SHALL COMPLY WITH THE BUILDING CODE SECURITY REQUIREMENTS AS ADOPTED BY THE LOCAL BUILDING DEPARTMENT AND SPECIFIED ELSEWHERE ON THIS SHEET.
4. FRENCH DOORS AND WINDOWS USED AS A MEANS TO PROVIDE MINIMUM VENTILATION REQUIREMENTS SHALL BE OPEN-ABLE AND SHALL BE PROVIDED WITH SCREENS UNLESS NOTED OTHERWISE ON THE PLANS AND SPECIFICATIONS. ALL SUCH DOORS AND WINDOWS SHALL BE EQUIPPED WITH A MECHANICAL HOLD OPEN DEVICE.
5. CONTRACTOR SHALL VERIFY EXACT ROUGH OPENING HEIGHT AND WIDTH OF ALL DOORS AND WINDOWS WITH DOOR AND WINDOW MANUFACTURER PRIOR TO START OF ROUGH FRAMING.
6. ROUGH FRAMING SUB-CONTRACTOR IS RESPONSIBLE FOR PROVIDING ALL FRAMING NAILERS AND FILLERS AS REQUIRED FOR THE PROPER INSTALLATION OF ALL DOORS AND WINDOWS.
7. UNLESS NOTED OTHERWISE, ALL PANEL TYPE DOORS SHALL BE SELECTED BY OWNER AND INSTALLED BY CONTRACTOR.
8. WINDOW UNITS SHALL BE FULLY ASSEMBLED PER MANUFACTURER SPECIFICATIONS AND SHALL BE HINGED AS INDICATED ON EXTERIOR ELEVATIONS AND/OR PLANS. WINDOW UNITS SHALL BE DELIVERED TO THE JOB SITE WITH ALL HARDWARE SUCH AS OPERATORS, CRANK, OPERATOR ARM, LOCK, ETC.
9. OWNER SHALL PROVIDE ALL NECESSARY HARDWARE NOT INCLUDED IN MANUFACTURED UNIT CONTRACTOR TO INSTALL ALL HARDWARE.
10. ALL DOOR HARDWARE SHALL BE PROVIDED BY OWNER AND INSTALLED BY CONTRACTOR.
11. ALL DOOR UNITS AND THEIR RESPECTIVE FRAMES SHALL BE PAINT GRADE.
12. ALL EXTERIOR SWING DOORS TO BE SUPPLIED WITH MILL FINISHED EXTRUDED BRONZE PEMKO THRESHOLDS 114 B OR 145 B/ WITH 24 GAG.1, SHEET METAL DRAIN PAN. THRESHOLDS TO BE POLISHED TO REMOVE MILL MARKINGS. PEMKO SPRING BRONZE WEATHER STRIPPING @ HEAD AND JAMBS.
13. CAULK ALL INTERIOR/ EXTERIOR PLASTER JOINTS.
14. ALL GLAZING ON DOORS AND WINDOWS TO BE DBL GLAZE 'LOW E' INSULATED GLASS.
15. ALL EXTERIOR DOOR DETAILING TO MATCH WINDOW DET ON SHEET. ALL EXTERIOR DOORS TO HAVE 24 GA.G.1., SHEET METAL DRAIN PAN. PEMKO SPRING BRONZE WEATHERSTRIPPING @ HEAD & JAMBS.

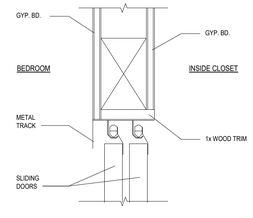
SECURITY NOTES

1. ALL EXTERIOR DOOR AND WINDOW OPENINGS ARE SECURITY OPENINGS, AND ALL NOTES SHALL APPLY.
2. WOOD FLUSH-TYPE DOORS SHALL BE 1 3/4" THICK MINIMUM AND SHALL BE OF SOLID CORE CONSTRUCTION.
3. HOLLOW CORE DOORS OR DOORS LESS THAN 1 3/4" IN THICKNESS SHALL BE COVERED ON THE INSIDE FACE WITH 16 GAUGE SHEET METAL ATTACHED WITH SCREWS AT 6" O/C AROUND THE PERIMETER, OR EQUIVALENT.
4. GLAZED OPENINGS WITHIN 40" OF THE DOOR LOCK, WHEN THE DOOR IS IN THE CLOSED POSITION. SHALL BE FULLY TEMPERED GLASS OR APPROVED BURGLARY RESISTANT MATERIAL, OR SHALL BE PROTECTED BY METAL BARS, SCREENS OR GRILLES HAVING A MAXIMUM OPENING OF 2". THE PROVISIONS OF THIS SECTION SHALL NOT APPLY TO VIEW PORTS OR WINDOWS, WHICH DO NOT EXCEED 2" IN THEIR GREATEST DIMENSION.
5. GLASS DOORS SHALL HAVE FULLY TEMPERED GLASS COMPLYING WITH SECTION 91.1711 (D) OF THE LOS ANGELES CITY BUILDING CODE.
6. DOORSTOPS OF IN-SWINGING DOORS SHALL BE OF ONE-PIECE CONSTRUCTION WITH THE JAMB, OR JOINED BY RABBET TO THE JAMB.
7. THE STRIKE PLATE FOR LATCHES AND THE HOLDING DEVICE FOR PROJECTION DEAD BOLTS IN WOOD CONSTRUCTION SHALL BE SECURED TO THE JAMB AND THE WALL FRAMING WITH SCREWS NOT LESS THAN 2 1/1" IN LENGTH.
8. ALL PIN-TYPE HINGES WHICH ARE ACCESSIBLE FROM OUTSIDE THE SECURED AREA WHEN THE DOOR IS CLOSED SHALL HAVE NON-REMOVABLE HINGE PINS. IN ADDITION THEY SHALL HAVE MINIMUM ¼" DIAMETER STEEL JAMB STUD WITH ¼" MINIMUM PROJECTION UNLESS THE HINGES ARE SHAPED TO PREVENT REMOVAL OF THE DOOR IF THE HINGE PINS ARE REMOVED.
9. DEAD BOLTS SHALL HAVE HARDENED INSERTS; PROVIDE DEADLOCKING LATCH KEY OPERATED LOCKS ON THE EXTERIOR; LOCKS SHALL BE OPENABLE WITH OUR KEY, SPECIAL KNOWLEDGE OR SPECIAL EFFORT FROM THE INTERIOR.
10. STRAIGHT DEAD BOLTS SHALL HAVE A MINIMUM THROW OF 1" AND AN EMBEDMENT OF NOT LESS THAN 5/8".
11. A HOOK SHAPED OR AN EXPANDING-LUG DEAD BOLT SHALL HAVE A MINIMUM THROW OF ¾".
12. CYLINDER GUARDS SHALL BE INSTALLED ON ALL CYLINDERS LOCKS WHENEVER THE CYLINDER PROJECTS BEYOND THE FACE OF THE DOOR OR IS OTHERWISE ACCESSIBLE TO GRIPPING TOOLS.
13. SLIDING GLASS DOORS AND WINDOWS SHALL BE EQUIPPED WITH LOCKING DEVICES AND SHALL BE SO CONSTRUCTED AND INSTALLED THAT THEY REMAIN INTACT AND ENGAGED WHEN SUBJECTED TO THE TESTS SPECIFIED IN SECTIONS 91.6731 AND 91.6732.
14. SLIDING GLASS DOORS AND WINDOWS SHALL BE PROVIDED WITH A DEVICE IN THE UPPER CHANNEL OF THE MOVING PANEL TO PROHIBIT RAISING AND REMOVING OF THE MOVING PANEL IN THE CLOSED OR PARTIALLY OPEN POSITION.
15. SCREENS, BARRICADES, OR FENCES MADE OF MATERIAL WHICH PRECLUDES HUMAN CLIMBING SHALL BE PROVIDED AT EVERY PORTION OF EVERY ROOF, BALCONY, OR SIMILAR SURFACE WHICH IS WITHIN 8' OF A UTILITY POLE OR SIMILAR STRUCTURE.
16. PROVIDE SAFETY GLAZING IN THE FOLLOWING LOCATIONS PER SECTION 2406.4 UBC 1994 EDITION: SLIDING OR SWINGING DOORS TUB AND/OR SHOWER ENCLOSURES AND GLAZING IN WALLS LESS THAN 60" ABOVE THE STANDING SURFACE OF TUBS OR SHOWERS. GLAZING WITHIN A 24" ARC OF A DOOR.



INT. DOOR JAMB - HEAD SIM. 2

DOOR HEAD - JAMB SIM. 1



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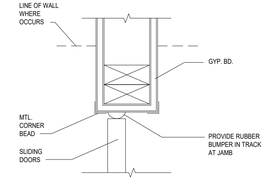

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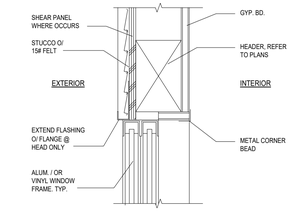

TYP. WINDOW HEAD - JAMB SIM. 3

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SHEET TITLE: DOOR AND WINDOWS SCHEDULE

ARCHITECT:
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Ph: 818 770 0161 Email: farzin.maly@gmail.com

OWNER AND PROJECT ADDRESS:
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1251 Sunset Blvd, Los Angeles, CA 90026

REVISIONS	NO.	DATE:
	1	
	2	
	3	

MALY ARCHITECTS INC.

LICENSED ARCHITECT
FARZIN MALY
NO. C-33731
05-31-19
RENEWAL DATE
STATE OF CALIFORNIA

PROJECT NO: Project Number
DATE: 6/28/2021 10:44:13 AM
DRAWN BY: AM, SJ, MB
APROVED BY: AM

SHEET NO:
A5.04

COUNTY CLERK'S USE

CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
200 NORTH SPRING STREET, ROOM 395
LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT

NOTICE OF EXEMPTION

(PRC Section 21152; CEQA Guidelines Section 15062)

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

PARENT CASE NUMBER(S) / REQUESTED ENTITLEMENTS
DIR-2018-6634-TOC

LEAD CITY AGENCY
City of Los Angeles (Department of City Planning)

CASE NUMBER
ENV-2018-6635-CE

PROJECT TITLE
1251 West Sunset Boulevard

COUNCIL DISTRICT

PROJECT LOCATION (Street Address and Cross Streets and/or Attached Map) ☐ Map attached.
1251, 1251½, 1251¼, 1253, 1253½, 1253¼, 1255, 1255½, 1257½, 1259 West Sunset Blvd.

PROJECT DESCRIPTION: Demo of ten Existing residential structures and the construction of a 70-unit Residential development. ☑ Additional page(s) attached.

NAME OF APPLICANT / OWNER:
AYM Investment, LLC

CONTACT PERSON (If different from Applicant/Owner above)
Andy Simhaee

(AREA CODE) TELEPHONE NUMBER | EXT.
213-747-2560

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

STATE CEQA STATUTE & GUIDELINES

☐ STATUTORY EXEMPTION(S)

Public Resources Code Section(s) _____

☑ CATEGORICAL EXEMPTION(S) (State CEQA Guidelines Sec. 15301-15333 / Class 1-Class 33)

CEQA Guideline Section(s) / Class(es) Section 15332, Class 32

☐ OTHER BASIS FOR EXEMPTION (E.g., CEQA Guidelines Section 15061(b)(3) or (b)(4) or Section 15378(b))

_____

JUSTIFICATION FOR PROJECT EXEMPTION: ☑ Additional page(s) attached

☒ None of the exceptions in CEQA Guidelines Section 15300.2 to the categorical exemption(s) apply to the Project.
☐ The project is identified in one or more of the list of activities in the City of Los Angeles CEQA Guidelines as cited in the justification.

IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT ISSUED BY THE CITY PLANNING DEPARTMENT STATING THAT THE DEPARTMENT HAS FOUND THE PROJECT TO BE EXEMPT.
If different from the applicant, the identity of the person undertaking the project.

CITY STAFF USE ONLY:

CITY STAFF NAME AND SIGNATURE
Stephanie Escobar Stephanie Escobar

STAFF TITLE
Planning Assistant

ENTITLEMENTS APPROVED
Transit Oriented Communities (TOC)

DISTRIBUTION: County Clerk, Agency Record
Rev. 6-22-2021

DEPARTMENT OF CITY PLANNING

COMMISSION OFFICE
(213) 978-1300

CITY PLANNING COMMISSION

SAMANTHA MILLMAN
PRESIDENT

CAROLINE CHOE
VICE-PRESIDENT

HELEN LEUNG
KAREN MACK
DANA M. PERLMAN
YVETTE LOPEZ-LEDESMA
JENNA HORNSTOCK
RENEE DAKE WILSON
VACANT

CITY OF LOS ANGELES
CALIFORNIA

ERIC GARCETTI
MAYOR

EXECUTIVE OFFICES
200 N. SPRING STREET, ROOM 525
LOS ANGELES, CA 90012-4801
(213) 978-1271

VINCENT P. BERTONI, AICP
DIRECTOR

SHANA M.M. BONSTIN
DEPUTY DIRECTOR

ARTHI L. VARMA, AICP
DEPUTY DIRECTOR

LISA M. WEBBER, AICP
DEPUTY DIRECTOR

JUSTIFICATION FOR PROJECT EXEMPTION CASE NO. ENV-2018-6635-CE

On December 26, 2018, the City of Los Angeles determined based on the whole of the administrative record that the project is exempt from California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines, Section 15332, and there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies. The project was found to be exempt based on the following:

Project Description:

The project is located at 1251 – 1259 West Sunset Boulevard in the Silver Lake – Echo Park – Elysian Valley Community Plan Area.

The property is currently improved with 10 residential units totaling 5,280 square feet. The proposed project includes the demolition of the existing 10 residential structures and the construction, use, and maintenance of a new, seven-story, 70-unit residential development with six (6) units (8% of the total number of dwelling units) set aside for Extremely Low Income Households. The proposed development consists of two (2) buildings (Building A and Building B). In total, the proposed development will encompass a total of 55,000 square feet of floor area resulting in a Floor Area Ratio (FAR) of 2.75 to 1. The project proposes a total of 38 parking spaces, 70 long-term bicycle spaces and seven (7) short-term bicycle spaces. The unit mix will be comprised of 27 studios and 43 one-bedroom units. A total of 7,025 square feet of open space will be provided throughout the proposed project. The project will maintain a 0-foot front yard, a 10-foot northern side yard, a 7-foot 6-inch southern side yard, and a 15-foot rear yard

Building A is located on the eastern portion of the lot with a frontage along Sunset Boulevard. and consists of five (5) residential levels over two (2) levels of at grade parking with a maximum height of 68 feet. Building B will be constructed with six (6) residential levels over one (1) level of at-grade parking with a maximum height of 68. The project also includes the export of approximately 18,200 cubic yards of earth. There are 16 non-protected trees and no protected trees located on the subject property. Per the Los Angeles Municipal Code (L.A.M.C.) the trees may need to be replaced. Accordingly, the trees will be subject to replacement requirements to the satisfaction of the Department of Public Works, Urban Forestry Division.

The project requires the following:

Pursuant to the Transit Oriented Communities Affordable Housing Incentive Program Guidelines (TOC Guidelines), the Tier 1 Project is eligible for and has been granted three (3) Additional Incentives in order to construct the proposed project:

a. **Rear Yard.** A 25% reduction in the required rear yard to allow 15 feet in lieu of the minimum 19 feet required for a seven-story housing development in the C2-1VL Zone.

b. **Side Yard.** A 25% reduction in the required southern side yard to allow seven (7) feet and six (6) inches in lieu of the minimum 10 feet required for a seven-story housing development in the C2-1VL Zone.

c. **Height.** The TOC height incentive allows for an additional 11 feet in height thereby creating a building envelope with the area necessary to accommodate the affordable housing units. The project is 68 feet in height, 11 feet above the allowable 57 feet maximum height.

Implementation of the California Environmental Quality Act

Pursuant to Section 21084 of the Public Resources Code, the Secretary for the Natural Resources Agency found certain classes of projects not to have a significant effect on the environment and declared them to be categorically exempt from the requirement for the preparation of environmental documents.

The project meets the conditions for a Class 32 Exemption found in CEQA Guidelines, Section 15332 (In-Fill Development Projects), and none of the exceptions to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 apply.

Conditions for a Class 32 Exemption

Class 32 consists of projects characterized as in-fill development meeting the conditions described below:

1) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with the applicable zoning designation and regulations;
2) The proposed developed occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses;
3) The project site has no value as habitat for endangered, rare or threatened species;
4) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality; and
5) The site can be adequately served by all required utilities and public services.

The project is located within the Silver Lake – Echo Park – Elysian Valley Community Plan which designates the subject property for General Commercial land uses and the property is zoned C2-1VL. The project is consistent with the applicable general plan land use designation and all applicable general plan policies as well as with the applicable zoning designation and regulations.

The subject site is wholly within the City of Los Angeles, on a site that is approximately 0.46 acres in size. Lots adjacent to the subject properties are developed with the following urban uses: single-family and multi-family residential uses and a variety of commercial uses. The site is currently developed and surrounded by development and therefore is not, and has no value as, a habitat for endangered, rare or threatened species. There are no protected trees on the site.

The project would not result in any significant effects related to traffic, noise, air quality, or water quality.

- A Traffic study dated August 28, 2018 was prepared by Jano Baghdanian & Associates concluded that based on the City's significance criteria, the study intersections would not

be significantly impacted as a result of the addition of the project traffic. On September 10, 2018, the Department of Transportation issued a memo stating that the traffic study prepared for the project adequately evaluated the project's traffic impacts on the surrounding community and that no significant traffic impacts would occur at any of the two (2) intersections analyzed.

- A Noise Study dated August 2018 was prepared by Meridian Consultants concluded that the project will result in less than significant impacts.

- An Air Quality Study dated August 2018 was prepared by Meridian Consultants concluded that the project will result in less than significant impacts.

- The project will be subject to Regulatory Compliance Measures, which require compliance with pollutant discharge, dewatering, stormwater conditions; and Best Management Practices for stormwater runoff.

- The project would not result in significant impacts to water quality.

The project site is currently and will continue to be adequately served by all public utilities and services.

Exceptions to Categorical Exemptions

There are six (6) exceptions to categorical exemptions must be considered in order to find a project exempt from CEQA: (a) Location; (b) Cumulative Impacts; (c) Significant Effect; (d) Scenic Highways; (e) Hazardous Waste Sites; and (f) Historical Resources.

The project is not located on or near any environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies. There is not a succession of known projects of the same type and in same place as the subject project. The project would not reasonably result in a significant effect on the environment due to unusual circumstances. The project is not located near a State Scenic Highway. Furthermore, according to Envirostor, the State of California's database of Hazardous Waste Sites, neither the subject site, nor any site in the vicinity is identified as a hazardous waste site. The project site has not been identified as a historic resource by local or state agencies, and the project site has not been determined to be eligible for listing in the National Register or Historic Places, California Register of Historical Resources, the Los Angles Historic-Cultural Monuments Register, and/or any local register, and was not found to be a potential historic resource based on the City's HistoricPlacesLA website or SurveyLA, the citywide survey of Los Angeles. Additionally, on March 2, 2021 the City Council disapproved the Cultural Heritage Commission's recommendation to include the Stires Staircase Bungalow Court located at the project site as a Historic Cultural Monument, therefore, there is no substantial evidence that the proposed project, and thus the requested incentive, will have a specific adverse impact on the physical environment, on public health and safety or the physical environment, or on any Historical Resource.

FORM GEN. 160A (Rev. 1/82)

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

1251 W Sunset Blvd
DOT Case No. CEN 18-47028

Date: September 10, 2018

To: Heather Bleemers, Senior City Planner
Department of City Planning

From: Wes Pringle, Transportation Engineer
Department of Transportation

Subject: **TECHNICAL MEMORANDUM FOR THE PROPOSED APARTMENT PROJECT LOCATED AT 1251 WEST SUNSET BOULEVARD**

The Department of Transportation (DOT) has reviewed the technical memorandum dated July 2018, prepared by Jano Baghdanian & Associates, for the proposed apartment development located at 1251 West Sunset Boulevard. In order to evaluate the effects of the project's traffic on the available transportation infrastructure, the significance of the project's traffic impacts is measured in terms of change to the volume-to-capacity (V/C) ratio between the "future no project" and the "future with project" scenarios. This change in the V/C ratio is compared to DOT's established threshold standards to assess the project-related traffic impacts. The transportation impact analysis included the detailed analysis of two signalized intersections. Based on DOT's current traffic impact criteria[1], none of these signalized intersections would be significantly impacted by project-related traffic prior to mitigation. The results of the transportation impact analysis, which accounted for other known development projects in evaluating potential cumulative impacts, adequately evaluated the project's traffic impacts on the surrounding community and is summarized in **Attachment 1**.

DISCUSSION AND FINDINGS

A. Project Description

The proposed apartment development at 1251 West Sunset Boulevard will replace a 10 unit apartment with a 74 unit apartment building (6 of which will be designated as affordable).

The project will provide on-site parking via one driveway on Sunset Boulevard. The number of parking spaces that will be provided by the project was not disclosed in the study. The project is expected to be completed by 2019.

B. Trip Generation

The project is estimated to generate a net increase of 449 daily trips, 29 trips in the a.m. peak hour, and 34 trips in the p.m. peak hour. The trip generation estimates are based on formulas published by the Institute of Transportation Engineers (ITE) Trip

[1] Per the DOT Transportation Impact Analysis Policies and Procedures, a significant impact is identified as an increase in the Critical Movement Analysis (CMA) value, due to project related traffic, of 0.01 or more when the final ("with project") Level of Service (LOS) is LOS E or F; an increase of 0.020 or more when the final LOS is LOS D; or an increase of 0.040 or more when the final LOS is LOS C.

Generation, 10th Edition, 2017. A copy of the trip generation table can be found in **Attachment 2**.

C. Freeway Analysis

The traffic study included a freeway impact analysis that was prepared in accordance with the State-mandated Congestion Management Program (CMP) administered by the Los Angeles County Metropolitan Transportation Authority (MTA). According to this analysis, the project would not result in significant traffic impacts on any of the evaluated freeway mainline segments. To comply with the Freeway Impact Analysis Agreement executed between Caltrans and DOT in October 2013, the study also included a screening analysis to determine if additional evaluation of freeway mainline and ramp segments was necessary beyond the CMP requirements. The project did not meet or exceed any of the four thresholds defined in the latest agreement, updated in December 2015. Exceeding one of the four screening criteria would require the applicant to work directly with Caltrans to prepare more detailed freeway analyses. No additional freeway analysis was required.

PROJECT REQUIREMENTS

A. Construction Impacts

DOT recommends that a construction work site traffic control plan be submitted to DOT's Citywide Temporary Traffic Control Section or Permit Plan Review Section for review and approval prior to the start of any construction work. Refer to http://ladot.lacity.org/what-we-do/plan-review to determine which section to coordinate review of the work site traffic control plan. The plan should show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. DOT also recommends that all construction related traffic be restricted to off-peak hours to the extent feasible.

B. Highway Dedication And Street Widening Requirements

On January 20, 2016, the City Council adopted the Mobility Plan 2035 which is the new Mobility Element of the General Plan. A key feature of the updated plan is to revise street standards in an effort to provide a more enhanced balance between traffic flow and other important street functions including transit routes and stops, pedestrian environments, bicycle routes, building design and site access, etc. Per the new Mobility Element, **West Sunset Boulevard** is designated as an Avenue I, which would require a 35- foot half-width roadway and a 50-foot half-width right-of-way. The applicant should check with BOE's Land Development Group to determine if there are any other applicable highway dedication, street widening and/or sidewalk requirements for this project.

C. Parking Requirements

The project will provide on-site parking via one driveway on Sunset Boulevard. The number of parking spaces that will be provided by the project was not disclosed in the study. The applicant should check with the Department of Building and Safety on the number of Code-required parking spaces needed for the project.

D. Driveway Access and Circulation

The proposed site plan illustrated in **Attachment 3** is acceptable to DOT; however, review of the study does not constitute approval of the driveway dimensions and internal circulation schemes. Those require separate review and approval and should be coordinated with DOT's Citywide Planning Coordination Section (201 N. Figueroa Street, 5th Floor, Room 550, at 213-482-7024). In order to minimize potential building design changes, the applicant should contact DOT for driveway width and internal circulation requirements so that such traffic flow considerations are designed and incorporated early into the building and parking layout plans. All new driveways should be Case 2 driveways and any security gates should be a minimum 20 feet from the property line. All truck loading and unloading should take place on site with no vehicles backing into the project via any of the project driveways.

E. Development Review Fees

An ordinance adding Section 19.15 to the Los Angeles Municipal Code relative to application fees paid to DOT for permit issuance activities was adopted by the Los Angeles City Council in 2009. This ordinance identifies specific fees for traffic study review, condition clearance, and permit issuance. The applicant shall comply with any applicable fees per this ordinance.

If you have any questions, please contact Johnathan Yu of my staff at (213) 972-4993.

Attachments

J:\Letters\2018\CEN18-47028_1251 Sunset Blvd_tech memo_apts.docx

c: Gerald Gubatan, Council District No. 1
Mehrdad Moshksar, Central District, DOT
Taimour Tanavoli, Case Management Office, DOT
Quyen Phan, Central District, BOE
Jano Baghdanian, Jano Baghdanian & Associates

ATTACHMENT 1
Summary of Volume to Capacity Ratios (V/C) and Level of Service (LOS)

TABLE 3: EXISTING PLUS PROJECT LEVEL OF SERVICE (LOS)

	Study Intersections	Existing Conditions				Existing Plus Project Conditions							
		AM Peak		PM Peak		AM Peak				PM Peak			
		V/C	LOS	V/C	LOS	V/C	LOS	Change in v/c	Significant Impact	V/C	LOS	Change in v/c	Significant Impact
1	Sunset Blvd & Vin Scully Ave	0.731	C	0.680	B	0.734	C	0.003	no	0.681	B	0.001	no
2	Sunset Blvd & Marion Ave	0.625	B	0.523	A	0.628	B	0.003	no	0.527	A	0.004	no

TABLE 5: FUTURE YEAR (2019) WITH PROJECT LOS

	Study Intersections	Future Conditions				Future Plus Project Conditions							
		AM Peak		PM Peak		AM Peak				PM Peak			
		V/C	LOS	V/C	LOS	V/C	LOS	Change in v/c	Significant Impact	V/C	LOS	Change in v/c	Significant Impact
1	Sunset Blvd & Vin Scully Ave	0.883	D	0.786	C	0.887	D	0.004	no	0.788	C	0.002	no
2	Sunset Blvd & Marion Ave	0.797	C	0.689	B	0.801	D	0.004	no	0.694	B	0.005	no

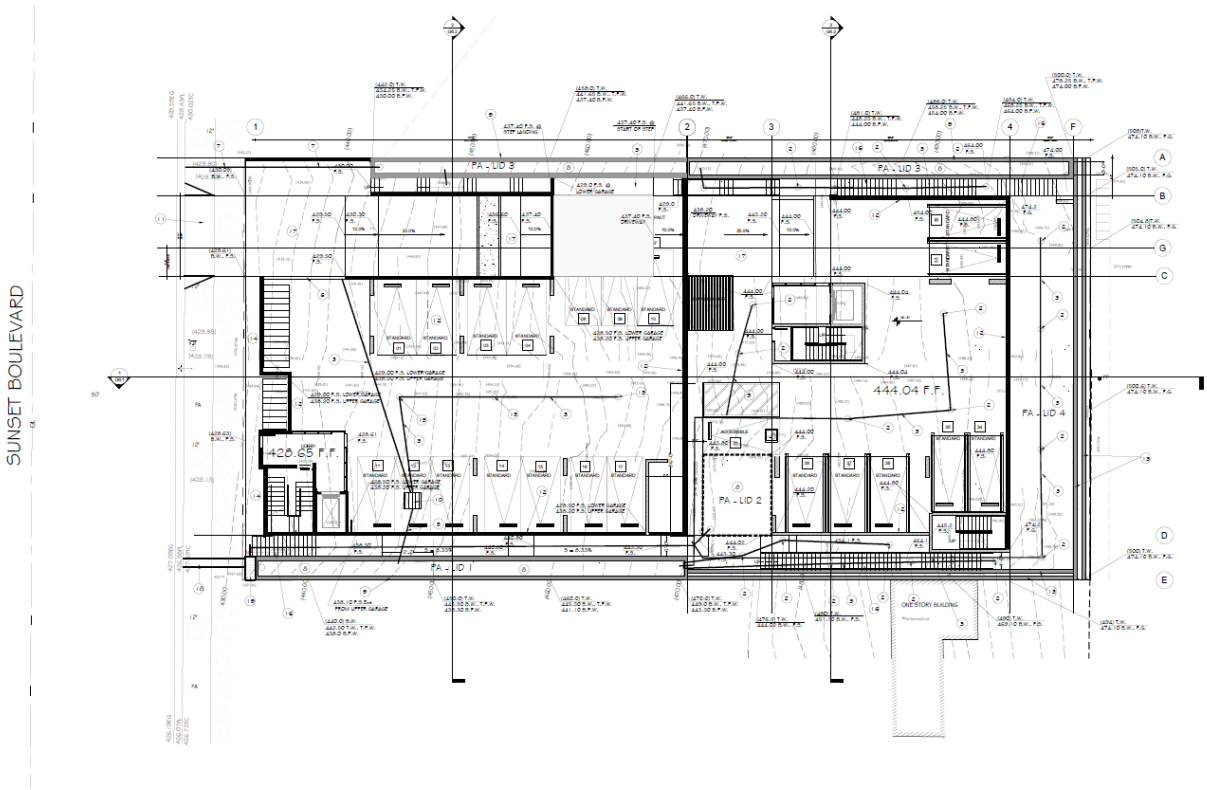
ATTACHMENT 2
Project Trip Generation Estimates

TABLE 1: PROJECT TRIP GENERATION [1]

Land Use (ITE Code)	Size	Units	Weekday AM Peak Hour Trips				Weekday PM Peak Hour Trips				Daily Trips	
			Rate	Total	In	Out	Rate	Total	In	Out	Rate	Total
New Project Land Use Added												
Multi-Family Low Rise (220)	68	du	0.46	31	7	24	0.56	38	24	14	7.32	498
Affordable Apartments[2]	6	du	0.5[2]	3	1	2	0.34[2]	2	1	1	4.08[2]	24
Existing Land Use Removed												
Multi-Family Low Rise (220)	10	du	0.46	5	1	4	0.56	6	4	2	7.32	73
Total Trip Generation				29	7	22	-	34	21	13	-	449

1. Source: ITE Trip Generation Manual, 10th Edition
2. Per City of Los Angeles' *Transportation Impact Study Guidelines*

ATTACHMENT 3
Project Site plan



Traffic, Transportation, and Parking Consultants
750 N. Glendale Ave.
Glendale, CA 91206
JanoBaghdanian@gmail.com
Ph: 818-694-2880
Fax: 818-888-4541

1251 Sunset Boulevard Apartments

Technical Memorandum

City of Los Angeles, CA

August 28, 2018

Prepared by:

Jano Baghdanian, P.E., T.E., PTOE
Jano Baghdanian & Associates
Traffic, Transportation & Parking Consultants

JBA
JANO BAGHDANIAN & ASSOCIATES

Traffic, Transportation, and Parking Consultants
750 N. Glendale Ave.
Glendale, CA 91206
JanoBaghdanian@gmail.com
Ph: 818-694-2880
Fax: 818-888-4541

To: Wes Pringle, Transportation Engineer, City of Los Angeles

From: Jano Baghdanian, JB & Associates

Date: August HY, 2018

Subject: 1251 Sunset Boulevard Technical Memorandum

JB & Associates is pleased to present the 1251 Sunset Boulevard Apartments ("the Project") technical memorandum. The purpose of this memorandum is to document the proposed trip generation & that the Project will not create transportation impacts to the surrounding roadway system.

1. Project Overview

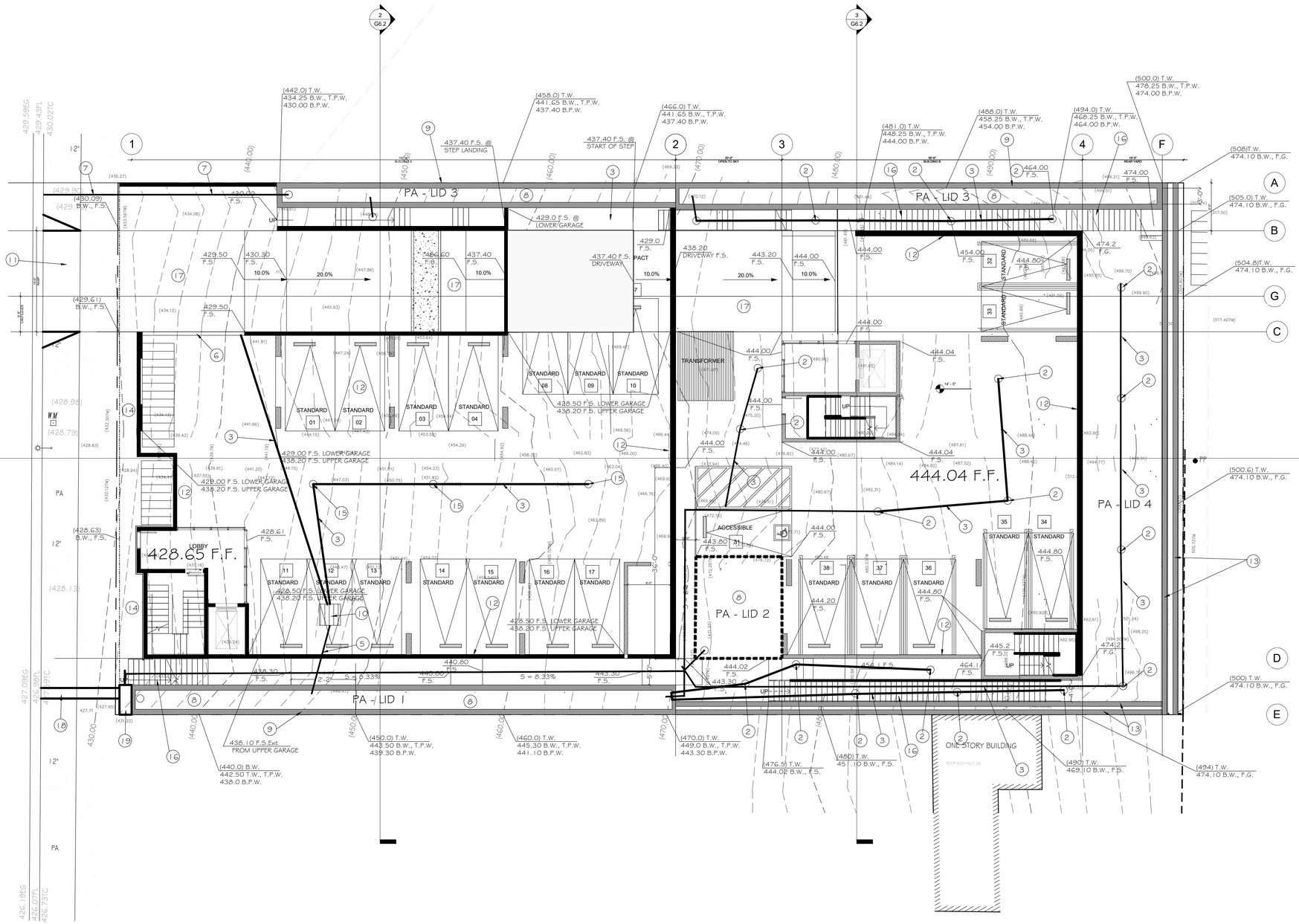
The Project site is located on Sunset Boulevard, approximately 600 feet north of Marion Avenue, in the City of Los Angeles. The Project consists of the construction of 74 unit apartment building (6 of which will be designated as affordable) to replace the existing 10 unit detached apartments. Access to the Project will be provided from a single driveway located on Sunset Boulevard. Please refer to **Figure 1** for an illustration of the Project's site plan.

2. Project Trip Generation Methodology

Trip rates from the Institute of Transportation Engineers (ITE) *Trip Generation Manual 10th Edition* were used in this analysis for the apartment units. To analyze the trips generated for the *affordable* apartment units, trip rates from the City of Los Angeles' *Transportation Impact Study Guidelines* were used.

Table 1 summarizes the trip generation findings.

SUNSET BOULEVARD



0' 5' 10' 20'

GRAPHIC SCALE: 1" = 10'

CONSRTUCTION NOTES:

1- .
2- AREA DRAIN PER DETAIL 2 SHEET G-9
3- 4" PVC PIPE SCH. 80 SEE PLUMBING PLAN
4- PERMEABLE PAVERS PER DETAIL 2 SHEET G-8
5- 2" CIP PIPE SUM PUMP DISCHARGE
6- TRENCH DRAIN PER DETAIL 5 SHEET G-9
7- 4" PVC PIPE SCH. 80 - UNDER SEPARATE "A" PERMIT
8- LID PLANTER AREA PER DETAIL 1 SHEET G-8
9- RETAINING WALL & PLANTER BOX SEE OTHERS PLANS
10- C.B. PER DETAIL 3 SHEET G-9 & SEE PLUMBING PLAN FOR SUMP-PUMP
11- CONCRETE DRIVEWAY UNDER SEPARATE "A" PERMIT
12- BUILDING RETAINING WALL PER OTHERS PLAN
13- RETAINING WALL SEE OTHERS PLAN
14- CONCRETE SIDEWALK UNDER SEPARATE "A" PERMIT
15- AREA DRAIN CONNECT TO SUMP-PUMP BASIN
16- CONCRETE STEPS ON GROUND PER DETAIL 6 SHEET G-9
17- DRIVEWAY RAMP SEE OTHERS PLAN FOR DETAIL
18- 24" WIDE CONCRETE CULVERT PER CITY OF LOA ANGELES STD PLAN UNDER SEPARATE "A" PERMIT
19- RETENTION BASIN 5' X 3' X12"

GRADING PLAN

SCALE 1"=10'

SEI
SIMHA ENGINEERING Inc.
• Consultants
• Planning
• Engineering
1332 S. St. Josephs Pl.
Los Angeles, CA 90015
Tel. (213) 747-2560
Fax. (213) 749-1035
Email: andy@simhaee.com

PLANS PREPARED UNDER THE DIRECTION OF:

ENAYAT SIMHAEE R.C.E. 37206
EXP. DATE: 06-30-2018

REGISTERED PROFESSIONAL ENGINEER
ENAYAT SIMHAEE
No. 37206
Exp. 06-30-2018
CIVIL
STATE OF CALIFORNIA

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OWNER

AYM INVESTMENT, LLC
400 N. STATE COLLEGE BLVD.
ANAHEIM, CA 92806

PROJECT:

NEW
RESIDENTIAL BUILDING
1251 SUNSET BLVD.

LOS ANGELES., CA. 90026

LEGAL DESCRIPTION:

LOT 25 & 27 BLOCK 31
ANGELENO HEIGHTS TRACT
MR 10 - 63

APN: # 5406-016-026, & 5406-015-001

Date	Revisions

GRADING PLAN
SITE PLAN

SCALE:	AS SHOWN
DESIGNED BY:	
CHECKED BY:	
DATE DRAWN:	
WS JOB NUMBER:	JN 1703

SHEET NUMBER:
G – 5

TABLE 1: PROJECT TRIP GENERATION [1]

Land Use (ITE Code)	Size	Units	Weekday AM Peak Hour Trips				Weekday PM Peak Hour Trips				Daily Trips	
			Rate	Total	In	Out	Rate	Total	In	Out	Rate	Total
New Project Land Use Added												
Multi-Family Low Rise (220)	68	du	0.46	31	7	24	0.56	38	24	14	7.32	498
Affordable Apartments[2]	6	du	0.5[2]	3	1	2	0.34[2]	2	1	1	4.08[2]	24
Existing Land Use Removed												
Multi-Family Low Rise (220)	10	du	0.46	5	1	4	0.56	6	4	2	7.32	73
Total Trip Generation				**29**	**7**	**22**	**-**	**34**	**21**	**13**	**-**	**449**

1. Source: ITE Trip Generation Manual, 10th Edition
2. Per City of Los Angeles' *Transportation Impact Study Guidelines*

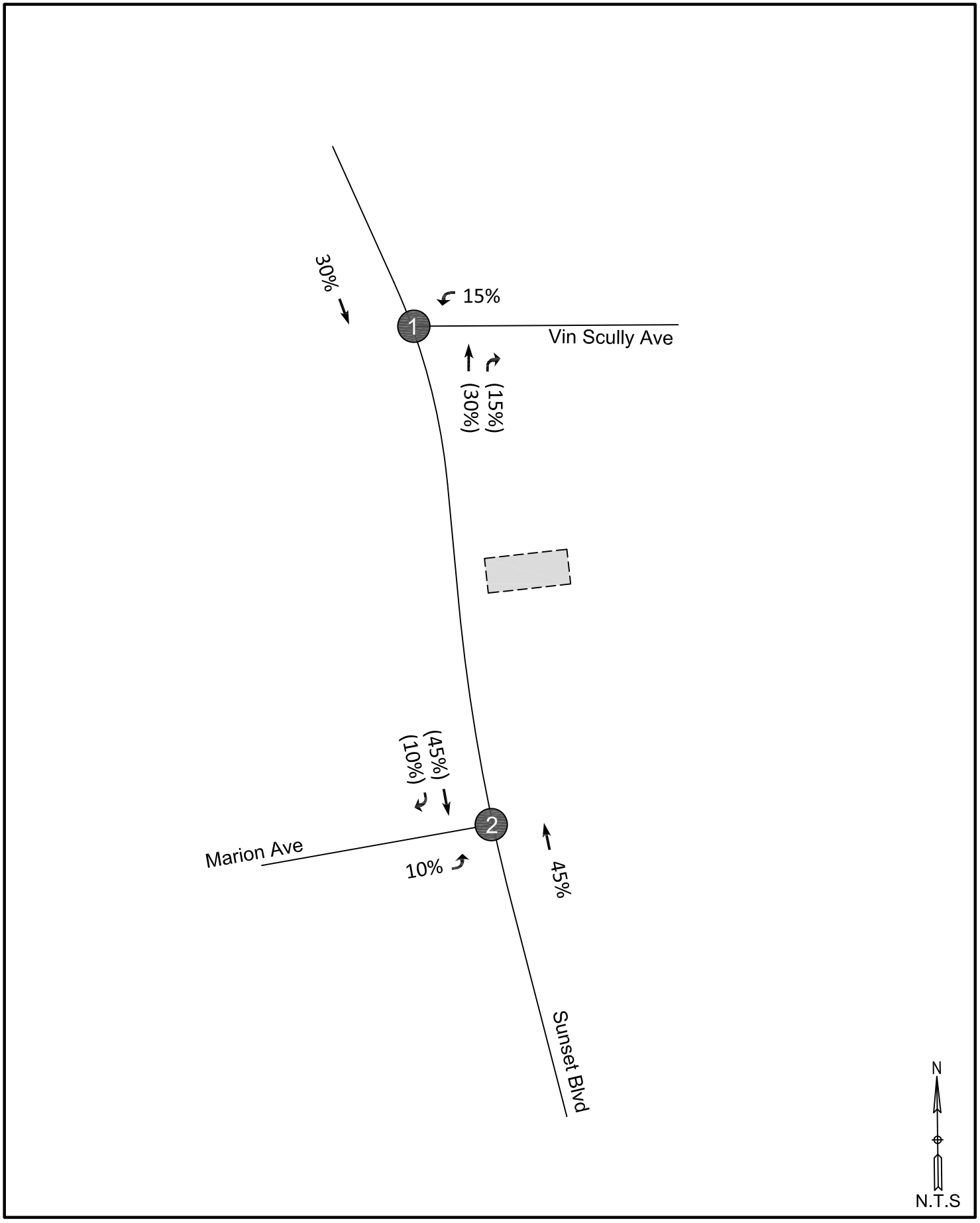
As shown in **Table 1**, the Project will result in the addition of 29 AM trips and 34 PM trips to the surrounding roadway network.

3. Trip Distribution & Trip Assignment

Trip distribution assumptions are used to determine the origin and destination of new vehicle trips associated with the Project. The geographic distribution of Project trips is based on the functional classification of streets in the vicinity, the magnitude of traffic volumes, as well as local knowledge of the roadway network. Based on the Project trip generation shown in **Table 1** and regional trip distribution assumptions, a proposed study area for the traffic analysis was derived. The location and the number of the intersections to be analyzed was reviewed and approved by the LADOT Staff.

The following figures illustrate the Project's Trip Distributions and Assignments for the project driveways and study intersections:

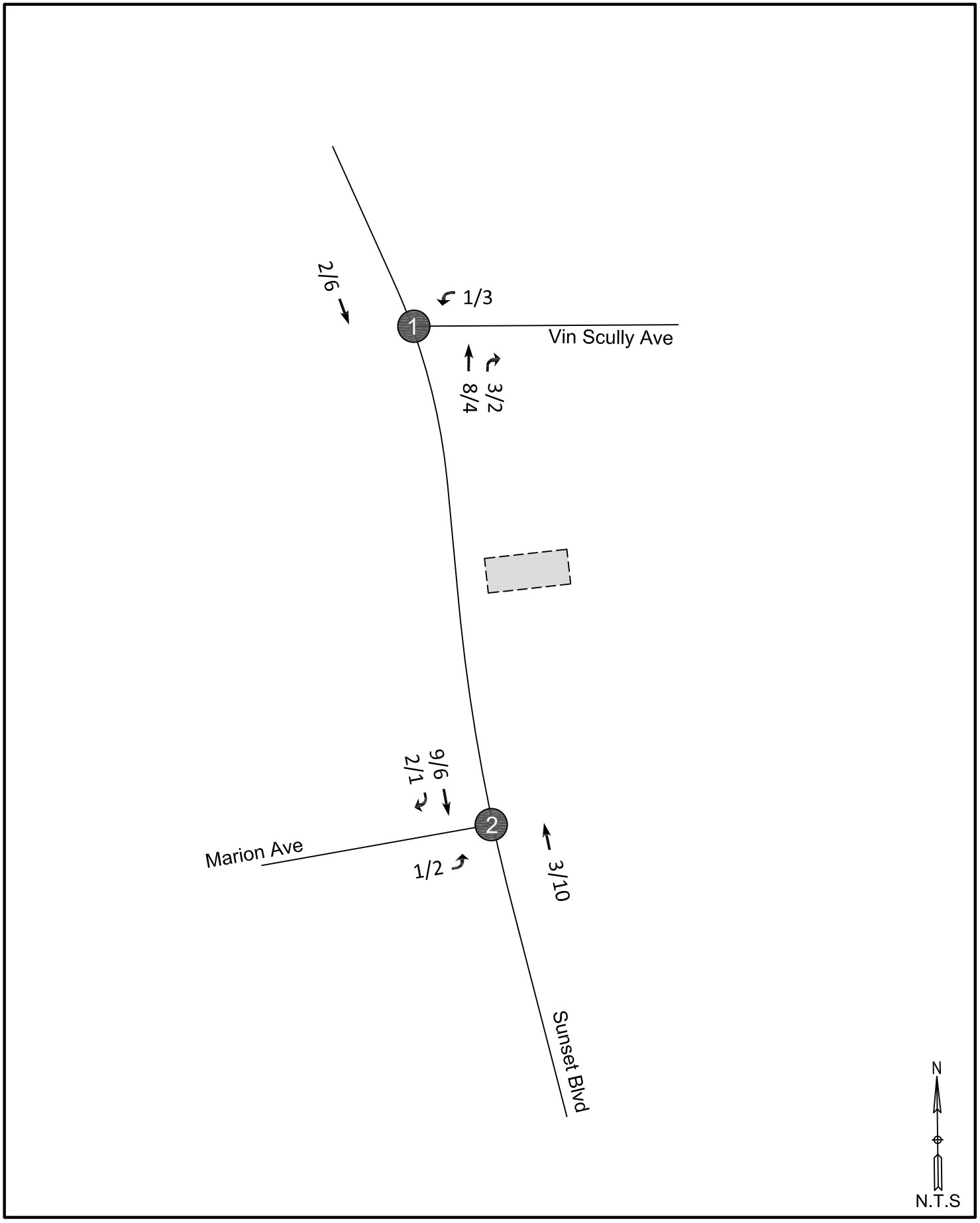
- **Figure 2**: Trip Distribution at Study Intersections
- **Figure 3**: Trip Assignment at Study Intersections



= Project Site xx (xx) = Inbound (Outbound)

JB & ASSOCIATES

Figure 2: Trip Distribution at Study Intersections



= Project Site xx/xx = AM/PM Peak

JB & ASSOCIATES

Figure 2: Trip Assignment at Study Intersections

4. Existing Traffic Volumes

Traffic counts were obtained for vehicular turning movements at the following two signalized intersections near the Project site:

(1) Sunset Boulevard & Vin Scully Avenue
(2) Sunset Boulevard & Marion Avenue

The traffic counts were performed on Tuesday May 15, 2018 during typical commuter hours (7:00 AM to 10:00 AM & 3:00 PM to 6:00 PM) to determine peak traffic counts.

Please refer to **Appendix A** for the manual traffic counts. Please also refer to **Figure 4** for a depiction of the lane configurations for the study intersections and **Figure 5** for an illustration of the AM and PM peak hour turning movement counts for the study intersections.

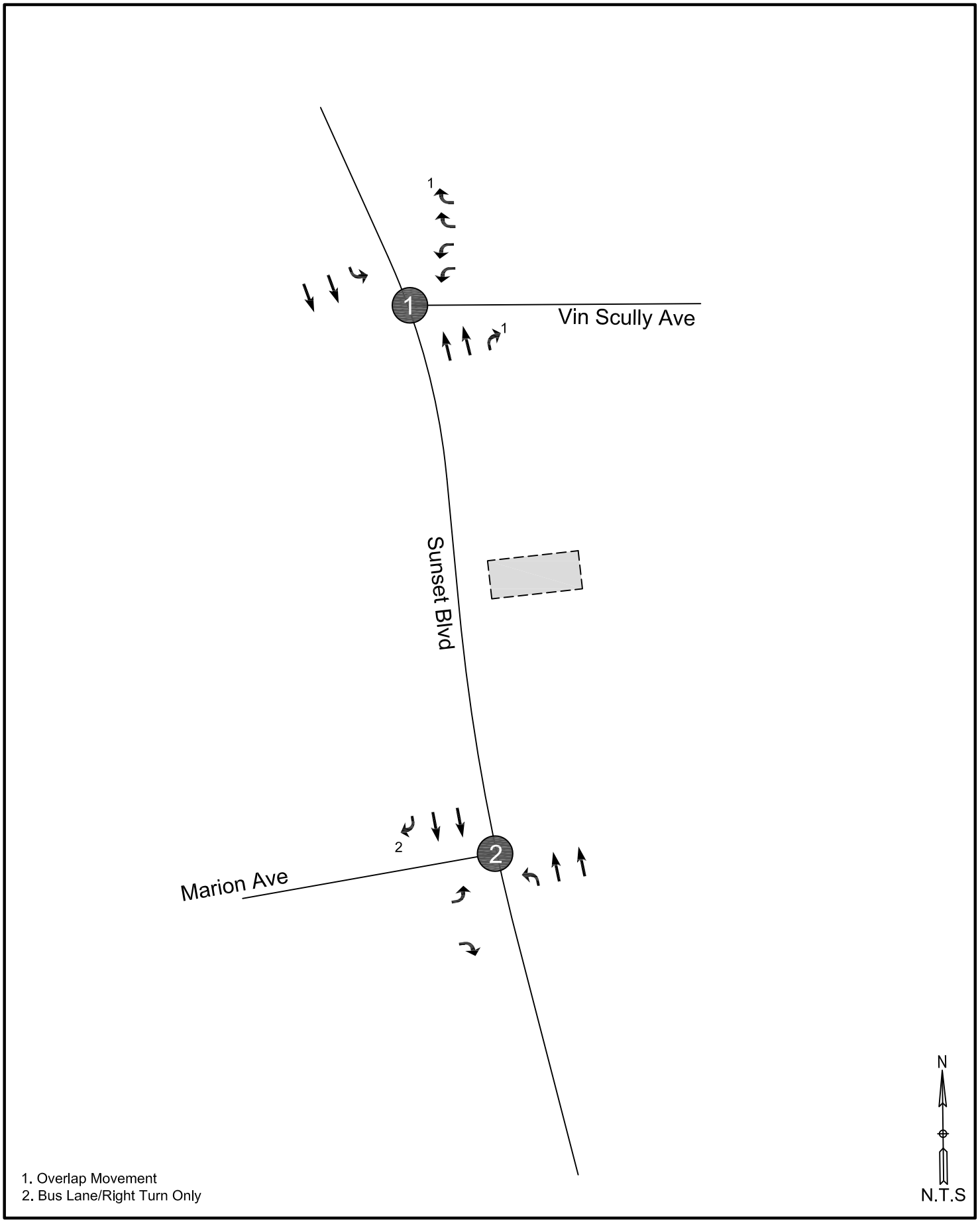


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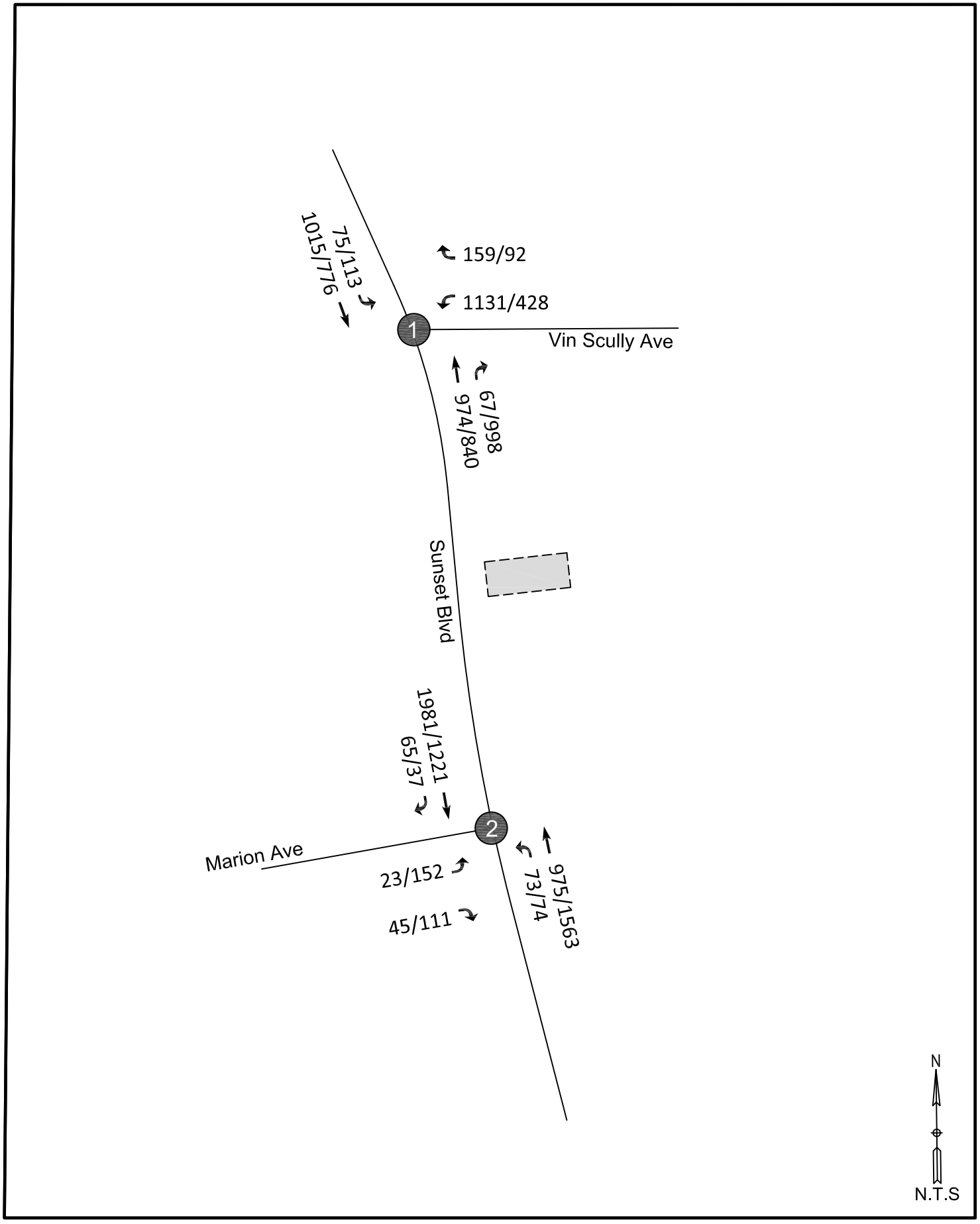
Figure 4: Lane Configurations at Study Intersections



= Project Site xx/xx = AM/PM Peak

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Figure 5: Existing Turning Movement Counts

5. Existing Conditions at Study Intersections

For signalized intersections, the City of Los Angeles uses the Critical Movement Analysis (CMA) method to analyze the potential traffic related impacts created by the proposed development. This method relies on the determination of a Level of Service (LOS) at each of the study intersections by first determining their corresponding Volume-to-Capacity (v/c) ratios. The CMA method therefore essentially compares the volume of traffic against the capacity of an intersection. Please refer to **Appendix B** for the CMA calculations for the study intersections and **Table 2** below for a summary of the Existing LOS analysis:

TABLE 2: EXISTING LEVEL OF SERVICE (LOS)

Study Intersections		Existing Conditions			
		AM Peak		PM Peak	
		V/C	LOS	V/C	LOS
1	Sunset Blvd & Vin Scully Ave	0.731	C	0.680	B
2	Sunset Blvd & Marion Ave	0.625	B	0.523	A

6. Existing Plus Project Traffic Conditions

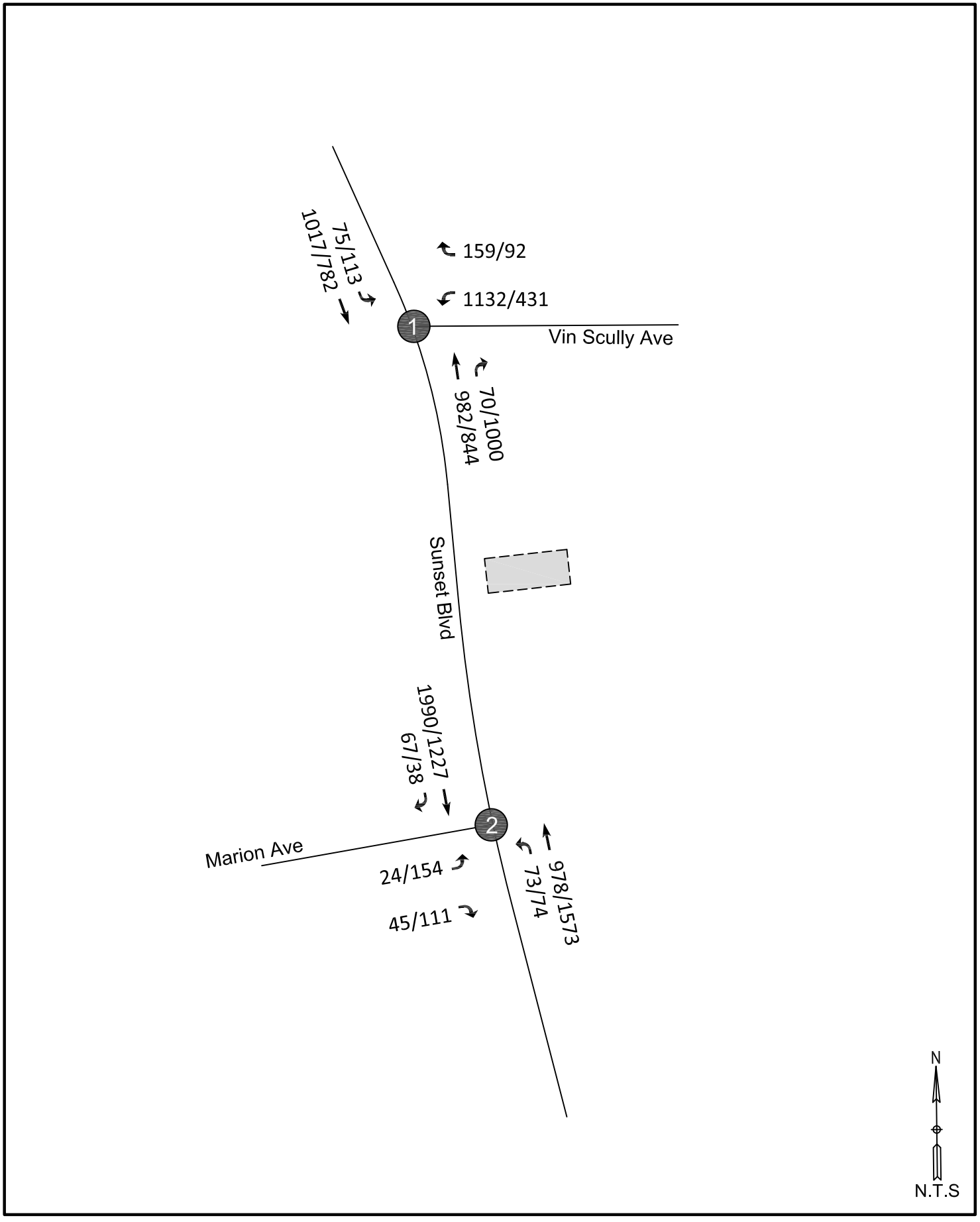
Please refer to **Table 3** for a list of the study intersections and their corresponding Levels of Services for the Existing Plus Project Traffic Conditions scenario.

To determine the Existing Plus Project Traffic Conditions, the project related traffic was added to existing traffic conditions. Please refer to **Figure 6** for an illustration of the Existing Plus Project morning and evening peak hour intersection volumes.

Based on the City's significance criteria, the study intersections would not be significantly impacted as a result of the addition of the project traffic.

TABLE 3: EXISTING PLUS PROJECT LEVEL OF SERVICE (LOS)

Study Intersections		Existing Conditions				Existing Plus Project Conditions							
		AM Peak		PM Peak		AM Peak				PM Peak			
		V/C	LOS	V/C	LOS	V/C	LOS	Change in v/c	Significant Impact	V/C	LOS	Change in v/c	Significant Impact
1	Sunset Blvd & Vin Scully Ave	0.731	C	0.680	B	0.734	C	0.003	no	0.681	B	0.001	no
2	Sunset Blvd & Marion Ave	0.625	B	0.523	A	0.628	B	0.003	no	0.527	A	0.004	no



= Project Site xx/xx = AM/PM Peak

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Figure 6: Existing + Project Traffic Volumes

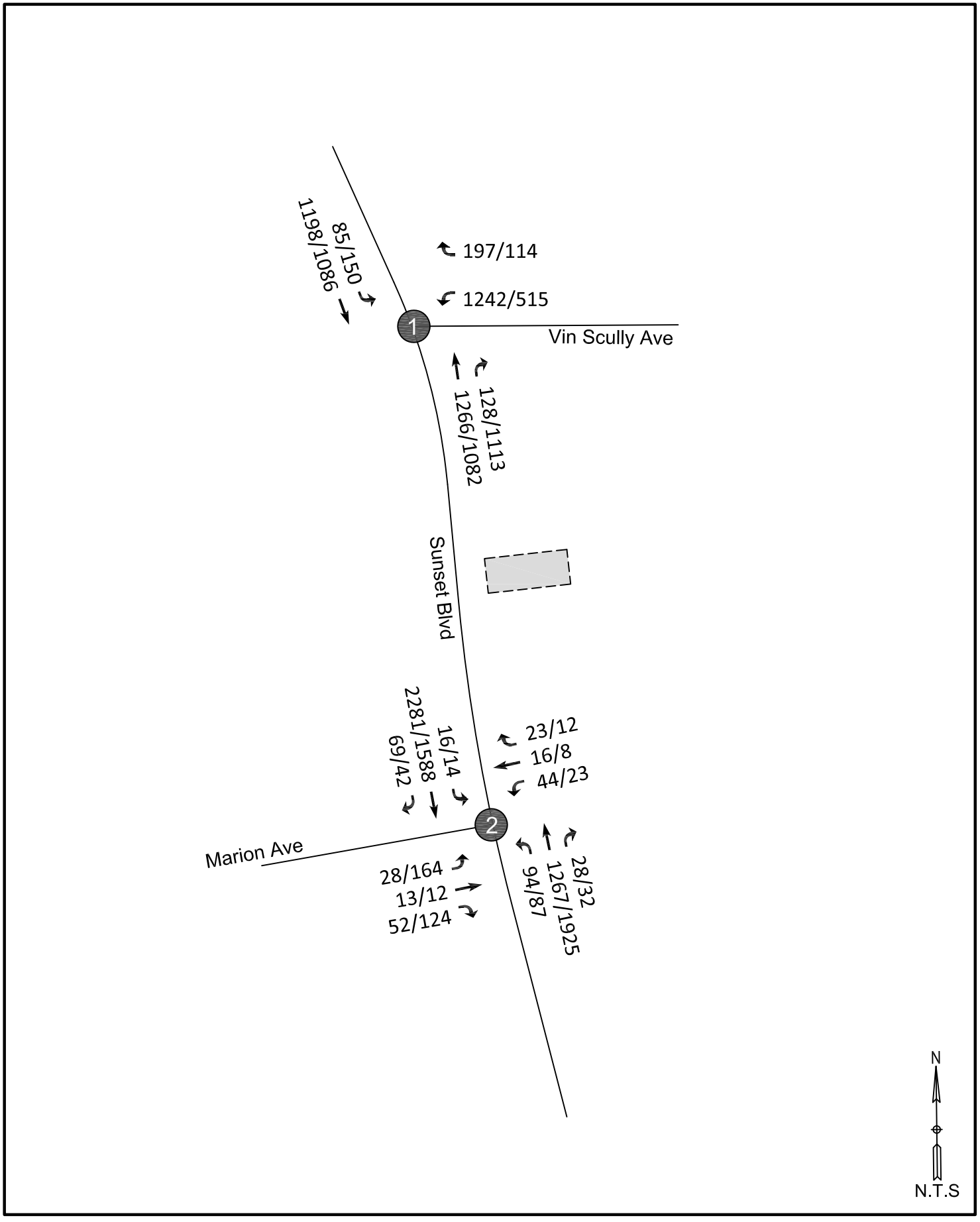
7. Future (Year 2019) Without Project Traffic Conditions

Please refer to **Table 4** for a list of the study intersections and their corresponding Levels of Services for the Future (Year 2019) Without Project Traffic Conditions scenario.

To determine the Future (Year 2019) Without Project Traffic Conditions, the trips generated by related projects (projects under construction, approved, and planned) was added to existing conditions. In addition an ambient growth factor was assumed for a general increase in traffic conditions in the area of the project. This will ensure that the evaluation of the future without project conditions versus the future with project conditions are done in a way that more accurately depicts actual future conditions. Please refer to **Figure 7** for an illustration of the Future (2019) without Project morning and evening peak hour intersection volumes.

TABLE 4: FUTURE YEAR (2019) WITHOUT PROJECT LOS

Study Intersections		Future Conditions			
		AM Peak		PM Peak	
		V/C	LOS	V/C	LOS
1	Sunset Blvd & Vin Scully Ave	0.883	D	0.786	C
2	Sunset Blvd & Marion Ave	0.797	C	0.689	B



= Project Site xx/xx = AM/PM Peak

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Figure 7: Future Without Project Traffic Volumes

8. Future (Year 2019) With Project Traffic Conditions

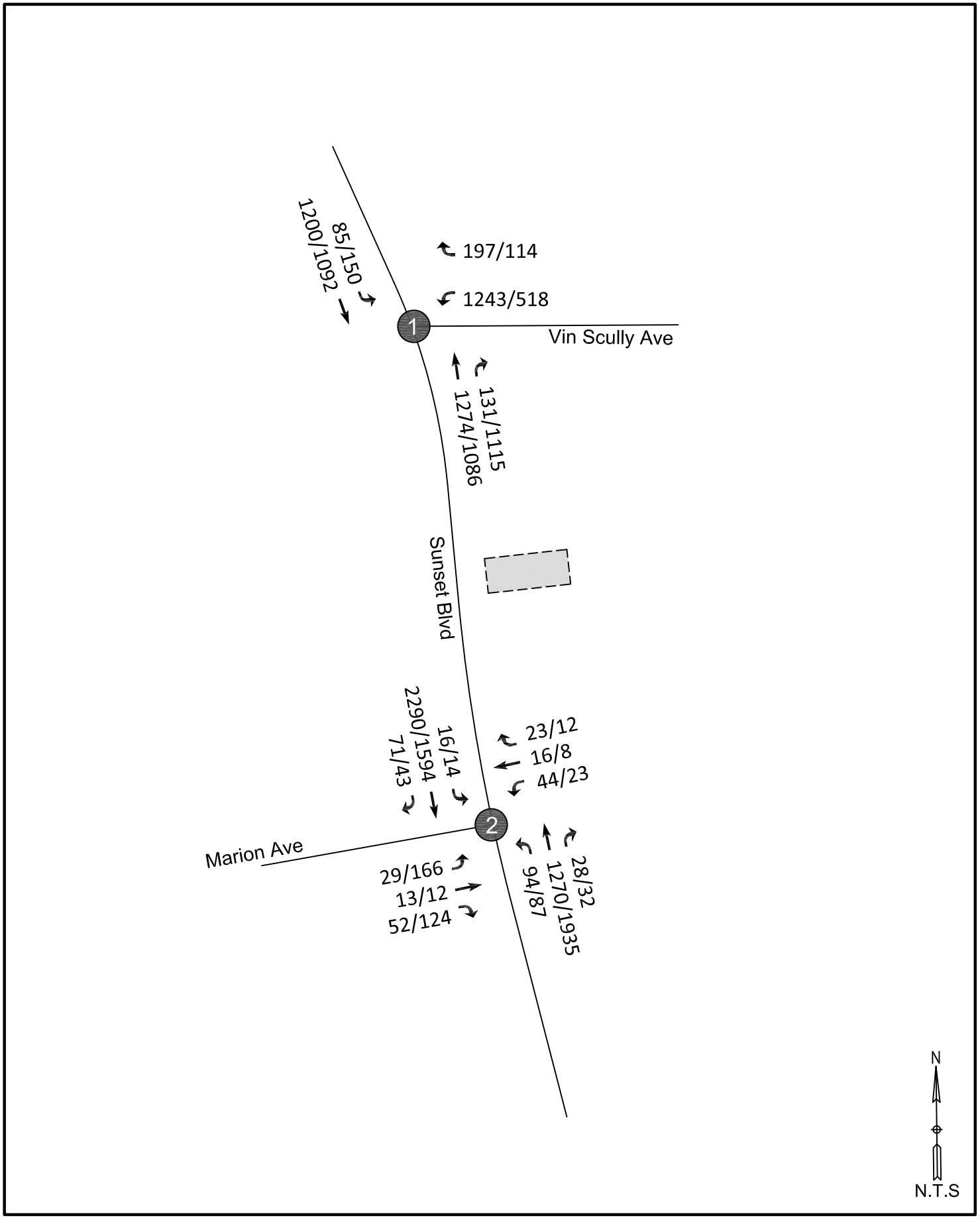
Please refer to **Table 5** for a list of the study intersections and their corresponding Levels of Services for the Future (Year 2019) With Project Traffic Conditions scenario.

To determine the Future (Year 2019) With Project Traffic Conditions, the traffic generated by the proposed project was added to the Future (Year 2019) Without Project Traffic Conditions. Please refer to **Figure 8** for an illustration of the Future (Year 2019) with project traffic morning and evening peak hour intersection volumes.

Based on the City's significance criteria, the study intersections would not be significantly impacted as a result of the addition of the project traffic.

TABLE 5: FUTURE YEAR (2019) WITH PROJECT LOS

Study Intersections		Future Conditions				Future Plus Project Conditions							
		AM Peak		PM Peak		AM Peak				PM Peak			
		V/C	LOS	V/C	LOS	V/C	LOS	Change in v/c	Significant Impact	V/C	LOS	Change in v/c	Significant Impact
1	Sunset Blvd & Vin Scully Ave	0.883	D	0.786	C	0.887	D	0.004	no	0.788	C	0.002	no
2	Sunset Blvd & Marion Ave	0.797	C	0.689	B	0.801	D	0.004	no	0.694	B	0.005	no



= Project Site xx/xx = AM/PM Peak

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Figure 8: Future With Project Traffic Volumes

9. Freeway Impact Screening Analysis

Off-Ramp Screening Analysis

Section E of the *LADOT Traffic Study Policies and Procedures*, Freeway Impact Analysis Screening Criteria, requires that an analysis be performed to determine whether a detailed freeway impact analysis will be necessary. The following analysis indicates that a focused freeway analysis will not be required.

The established criteria sets forth that further off-ramp analysis may be required if the Level of Service of any ramps in the project study area operate at a Level of Service D or worse and the Project related trips would result in a 2% (if LOS D) or 1% (if LOS E or F) more increase to the capacity of the freeway off-ramp facility.

Table 6: Freeway Off-Ramp Screening Analysis

Off-Ramp Name	Off-Ramp Capacity	Number of Lanes Providing Access to Project	Total Capacity	AM		PM		Freeway Analysis Required?
				Trips Generated	% of Capacity	Trips Generated	% of Capacity	
101 Fwy Off-Ramp & Echo Park[1]	850 Veh/Hr/Ln	1	850 Veh/Hr	1[2]	0.12%	3[2]	0.35%	No[3]

1. Similar capacity as other nearby off-ramps (110 Off-Ramp/Sunset)
2. Conservatively assumes 10% of inbound trips come from single off-ramp
3. To provide a conservative screening analysis, freeway off-ramp facility is assumed to operate at a LOS F.

Freeway Mainline Screening Analysis

Furthermore, the established criteria sets forth that further freeway segment analysis may be required if the project related trips would result in a 1% or more increase to the freeway mainline capacity of a freeway segment operating at a Level of Service E or F.

Table 7: Freeway Mainline Screening Analysis

Freeway Mainline Segment	Mainline Capacity	Number of Lanes	Total Capacity	AM		PM		Freeway Analysis Required?
				Trips Generated	% of Capacity	Trips Generated	% of Capacity	
101 Fwy n/o 110 Fwy[1]	2000 Veh/Hr/Ln	4	8,000 Veh/Hr	6[2]	0.08%	7[2]	0.09%	No[3]

1. Nearest freeway mainline facility
2. Conservatively assumes 20% of trips generated from freeway segment.
3. To provide a conservative screening analysis, freeway mainline segment is assumed to operate at a LOS F.

10. Conclusion

This technical memorandum projected the trips generated by the proposed Project. To evaluate the impacts of the trips projected to be generated by the project, 2 signalized intersections were analyzed during the AM and PM peak hours. Traffic counts were obtained at the study intersections and the Level of Service (LOS) of these intersections was evaluated under the following scenarios:

(1) Existing Traffic Condition
(2) Existing Plus Project Traffic Condition
(3) Future (2019) Without Project Condition
(4) Future (2019) With Project Condition

Based on the City's significance criteria, the study intersections would not be significantly impacted as a result of the addition of the Project traffic.

APPENDIX A

Traffic Counts

CITY TRAFFIC COUNTERS

www.ctcounters.com

File Name : Sunset_VinScully
Site Code : 00000000
Start Date : 5/15/2018
Page No : 1

Groups Printed- Vehicles

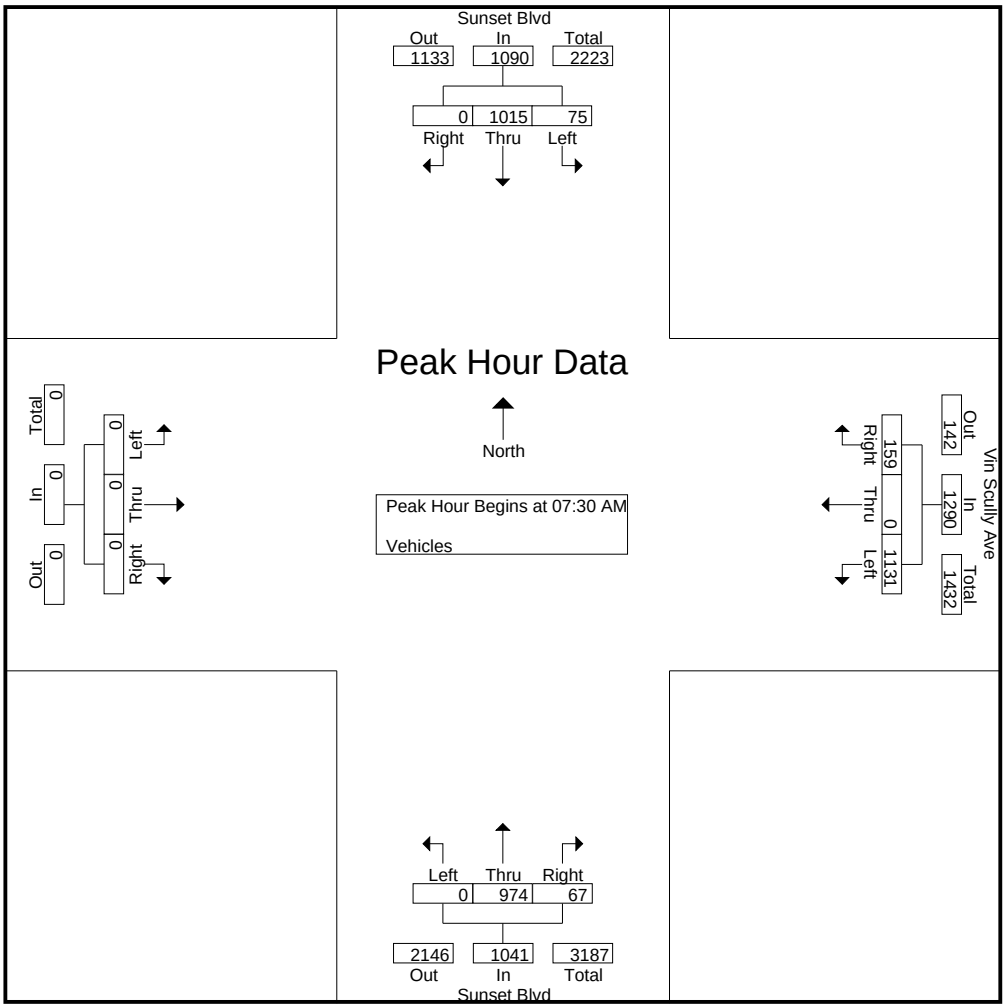
	Sunset Blvd Southbound			Vin Scully Ave Westbound			Sunset Blvd Northbound			Eastbound			
Start Time	Left	Thru	Right	Left	Thru	Right	Left	Thru	Right	Left	Thru	Right	Int. Total
07:00 AM	16	135	0	291	0	20	0	209	18	0	0	0	689
07:15 AM	10	220	0	299	0	23	0	251	18	0	0	0	821
07:30 AM	16	228	0	272	0	52	0	272	21	0	0	0	861
07:45 AM	22	253	0	271	0	48	0	286	20	0	0	0	900
Total	64	836	0	1133	0	143	0	1018	77	0	0	0	3271
08:00 AM	19	251	0	277	0	34	0	228	9	0	0	0	818
08:15 AM	18	283	0	311	0	25	0	188	17	0	0	0	842
08:30 AM	22	225	0	295	0	25	0	167	23	0	0	0	757
08:45 AM	28	236	0	309	0	33	0	216	9	0	0	0	831
Total	87	995	0	1192	0	117	0	799	58	0	0	0	3248
09:00 AM	16	208	0	332	0	30	0	179	17	0	0	0	782
09:15 AM	24	219	0	294	0	49	0	200	21	0	0	0	807
09:30 AM	22	186	0	237	0	58	0	246	29	0	0	0	778
09:45 AM	19	171	0	204	0	42	0	190	20	0	0	0	646
Total	81	784	0	1067	0	179	0	815	87	0	0	0	3013
03:00 PM	31	149	0	121	0	20	0	208	139	0	0	0	668
03:15 PM	39	183	0	71	0	26	0	221	124	0	0	0	664
03:30 PM	26	166	0	72	0	21	0	155	181	0	0	0	621
03:45 PM	38	201	0	89	0	24	0	153	239	0	0	0	744
Total	134	699	0	353	0	91	0	737	683	0	0	0	2697
04:00 PM	43	169	0	79	0	25	0	184	234	0	0	0	734
04:15 PM	28	167	0	76	0	18	0	159	312	0	0	0	760
04:30 PM	37	188	0	79	0	9	0	153	248	0	0	0	714
04:45 PM	35	201	0	97	0	33	0	205	241	0	0	0	812
Total	143	725	0	331	0	85	0	701	1035	0	0	0	3020
05:00 PM	24	228	0	111	0	21	0	216	283	0	0	0	883
05:15 PM	24	193	0	112	0	19	0	213	245	0	0	0	806
05:30 PM	30	154	0	108	0	19	0	206	229	0	0	0	746
05:45 PM	26	181	0	97	0	8	0	215	243	0	0	0	770
Total	104	756	0	428	0	67	0	850	1000	0	0	0	3205
Grand Total	613	4795	0	4504	0	682	0	4920	2940	0	0	0	18454
Apprch %	11.3	88.7	0	86.8	0	13.2	0	62.6	37.4	0	0	0	
Total %	3.3	26	0	24.4	0	3.7	0	26.7	15.9	0	0	0	

CITY TRAFFIC COUNTERS

www.ctcounters.com

File Name : Sunset_VinScully
Site Code : 00000000
Start Date : 5/15/2018
Page No : 2

	Sunset Blvd Southbound				Vin Scully Ave Westbound				Sunset Blvd Northbound				Eastbound				
Start Time	Left	Thru	Right	App. Total	Left	Thru	Right	App. Total	Left	Thru	Right	App. Total	Left	Thru	Right	App. Total	Int. Total
Peak Hour Analysis From 07:00 AM to 11:45 AM - Peak 1 of 1																	
Peak Hour for Entire Intersection Begins at 07:30 AM																	
07:30 AM	16	228	0	244	272	0	**52**	324	0	272	**21**	293	0	0	0	0	861
07:45 AM	**22**	253	0	275	271	0	48	319	0	**286**	20	**306**	0	0	0	0	**900**
08:00 AM	19	251	0	270	277	0	34	311	0	228	9	237	0	0	0	0	818
08:15 AM	18	**283**	0	**301**	**311**	0	25	**336**	0	188	17	205	0	0	0	0	842
Total Volume	75	1015	0	1090	1131	0	159	1290	0	974	67	1041	0	0	0	0	3421
% App. Total	6.9	93.1	0		87.7	0	12.3		0	93.6	6.4		0	0	0		
PHF	.852	.897	.000	.905	.909	.000	.764	.960	.000	.851	.798	.850	.000	.000	.000	.000	.950

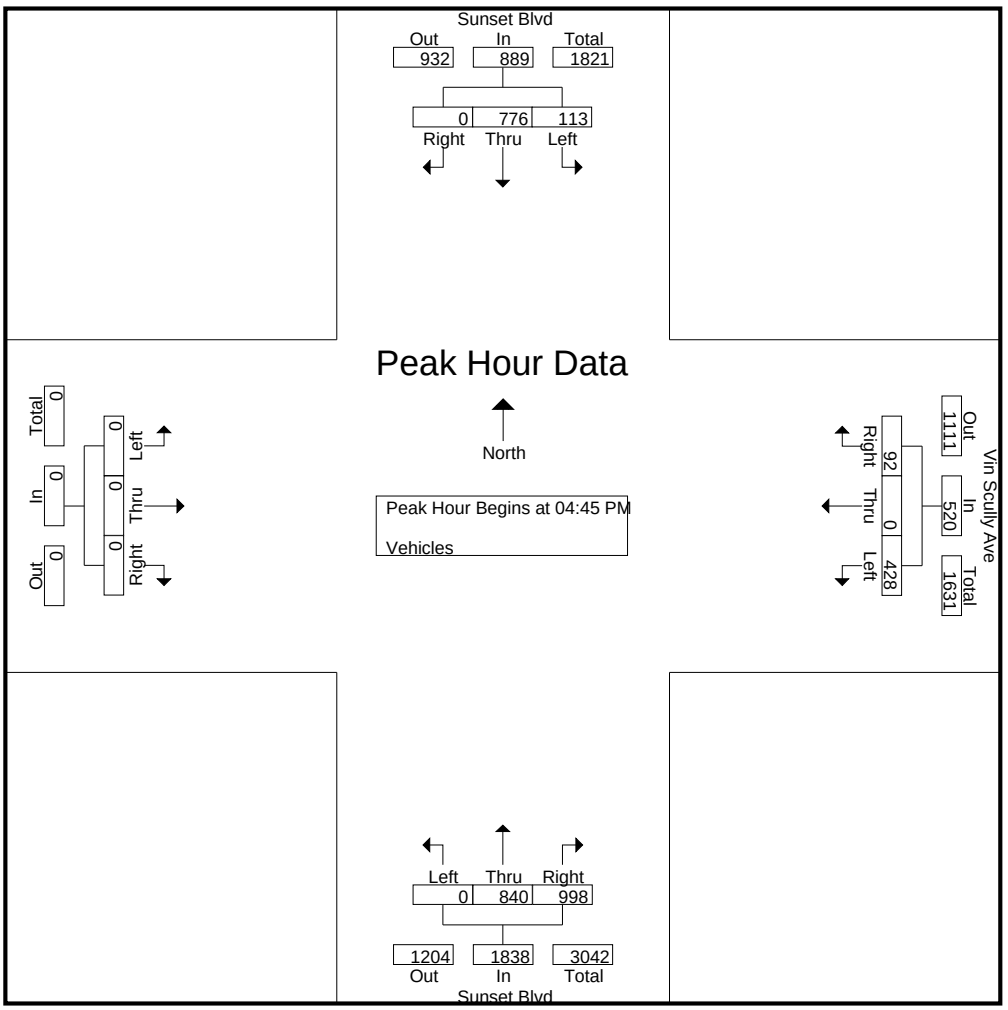


CITY TRAFFIC COUNTERS

www.ctcounters.com

File Name : Sunset_VinScully
Site Code : 00000000
Start Date : 5/15/2018
Page No : 3

	Sunset Blvd Southbound				Vin Scully Ave Westbound				Sunset Blvd Northbound				Eastbound				
Start Time	Left	Thru	Right	App. Total	Left	Thru	Right	App. Total	Left	Thru	Right	App. Total	Left	Thru	Right	App. Total	Int. Total
Peak Hour Analysis From 12:00 PM to 05:45 PM - Peak 1 of 1																	
Peak Hour for Entire Intersection Begins at 04:45 PM																	
04:45 PM	**35**	201	0	236	97	0	**33**	130	0	205	241	446	0	0	0	0	812
05:00 PM	24	**228**	0	**252**	111	0	21	**132**	0	**216**	**283**	**499**	0	0	0	0	**883**
05:15 PM	24	193	0	217	**112**	0	19	131	0	213	245	458	0	0	0	0	806
05:30 PM	30	154	0	184	108	0	19	127	0	206	229	435	0	0	0	0	746
Total Volume	113	776	0	889	428	0	92	520	0	840	998	1838	0	0	0	0	3247
% App. Total	12.7	87.3	0		82.3	0	17.7		0	45.7	54.3		0	0	0		
PHF	.807	.851	.000	.882	.955	.000	.697	.985	.000	.972	.882	.921	.000	.000	.000	.000	.919



CITY TRAFFIC COUNTERS

www.ctcounters.com

File Name : Sunset_VinScully_BP
Site Code : 00000000
Start Date : 5/15/2018
Page No : 1

Groups Printed- Bikes & Peds

	Sunset Blvd Southbound		Vin Scully Ave Westbound		Sunset Blvd Northbound		Eastbound		
Start Time	Thru	Peds	Thru	Peds	Thru	Peds	Thru	Peds	Int. Total
07:00 AM	0	0	4	1	0	0	0	5	10
07:15 AM	0	0	5	3	0	3	0	10	21
07:30 AM	0	0	4	0	0	0	1	4	9
07:45 AM	0	0	5	0	0	0	1	12	18
Total	0	0	18	4	0	3	2	31	58
08:00 AM	0	0	1	0	0	1	0	5	7
08:15 AM	0	0	4	0	0	0	2	7	13
08:30 AM	0	0	4	0	0	0	1	3	8
08:45 AM	0	0	5	1	0	1	0	11	18
Total	0	0	14	1	0	2	3	26	46
09:00 AM	0	0	5	0	0	0	1	8	14
09:15 AM	0	0	0	0	0	0	2	7	9
09:30 AM	0	0	2	0	0	0	0	14	16
09:45 AM	0	0	0	0	0	0	0	5	5
Total	0	0	7	0	0	0	3	34	44
03:00 PM	0	0	0	0	0	0	0	12	12
03:15 PM	0	0	0	0	0	0	1	6	7
03:30 PM	0	0	1	0	0	0	1	0	2
03:45 PM	0	0	0	0	0	0	0	3	3
Total	0	0	1	0	0	0	2	21	24
04:00 PM	0	0	2	0	0	0	2	4	8
04:15 PM	0	0	3	0	0	0	1	8	12
04:30 PM	0	0	2	0	1	1	0	2	6
04:45 PM	0	0	0	0	0	0	0	4	4
Total	0	0	7	0	1	1	3	18	30
05:00 PM	0	0	1	0	0	0	0	3	4
05:15 PM	0	0	1	0	0	0	1	8	10
05:30 PM	0	0	0	0	0	0	2	4	6
05:45 PM	0	0	0	0	0	0	2	8	10
Total	0	0	2	0	0	0	5	23	30
Grand Total	0	0	49	5	1	6	18	153	232
Apprch %	0	0	90.7	9.3	14.3	85.7	10.5	89.5	
Total %	0	0	21.1	2.2	0.4	2.6	7.8	65.9	

CITY TRAFFIC COUNTERS

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File Name : Sunset_VinScully_BP
Site Code : 00000000
Start Date : 5/15/2018
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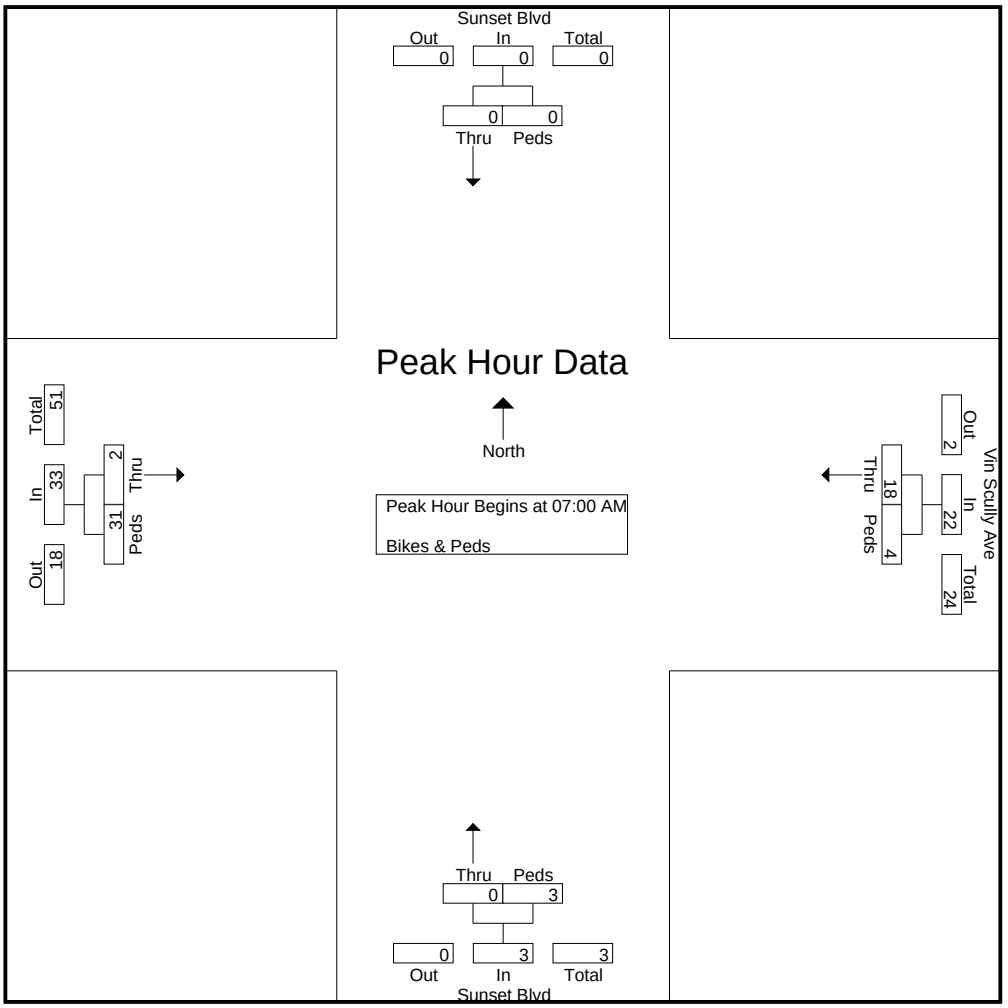
	Sunset Blvd Southbound			Vin Scully Ave Westbound			Sunset Blvd Northbound			Eastbound			
Start Time	Thru	Peds	App. Total	Thru	Peds	App. Total	Thru	Peds	App. Total	Thru	Peds	App. Total	Int. Total
Peak Hour Analysis From 07:00 AM to 11:45 AM - Peak 1 of 1													
Peak Hour for Entire Intersection Begins at 07:00 AM													
07:00 AM	0	0	0	4	1	5	0	0	0	0	5	5	10
07:15 AM	0	0	0	**5**	**3**	**8**	0	**3**	**3**	0	10	10	**21**
07:30 AM	0	0	0	4	0	4	0	0	0	**1**	4	5	9
07:45 AM	0	0	0	5	0	5	0	0	0	1	**12**	**13**	18
Total Volume	0	0	0	18	4	22	0	3	3	2	31	33	58
% App. Total	0	0		81.8	18.2		0	100		6.1	93.9		
PHF	.000	.000	.000	.900	.333	.688	.000	.250	.250	.500	.646	.635	.690



CITY TRAFFIC COUNTERS

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File Name : Sunset_VinScully_BP
Site Code : 00000000
Start Date : 5/15/2018
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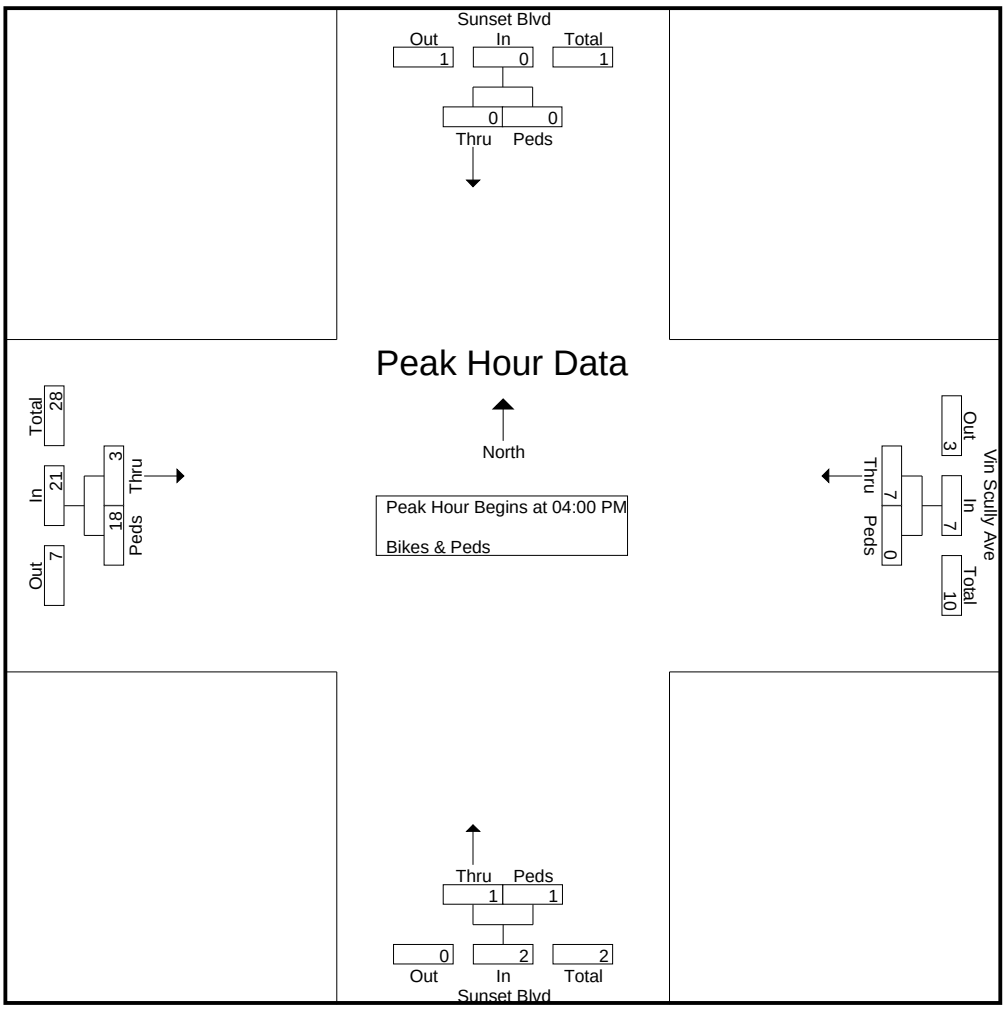
	Sunset Blvd Southbound			Vin Scully Ave Westbound			Sunset Blvd Northbound			Eastbound			
Start Time	Thru	Peds	App. Total	Thru	Peds	App. Total	Thru	Peds	App. Total	Thru	Peds	App. Total	Int. Total
Peak Hour Analysis From 12:00 PM to 05:45 PM - Peak 1 of 1													
Peak Hour for Entire Intersection Begins at 04:00 PM													
04:00 PM	0	0	0	2	0	2	0	0	0	**2**	4	6	8
04:15 PM	0	0	0	**3**	0	**3**	0	0	0	1	**8**	**9**	**12**
04:30 PM	0	0	0	2	0	2	**1**	**1**	**2**	0	2	2	6
04:45 PM	0	0	0	0	0	0	0	0	0	0	4	4	4
Total Volume	0	0	0	7	0	7	1	1	2	3	18	21	30
% App. Total	0	0		100	0		50	50		14.3	85.7		
PHF	.000	.000	.000	.583	.000	.583	.250	.250	.250	.375	.563	.583	.625



CITY TRAFFIC COUNTERS

www.ctcounters.com

File Name : Sunset_Marion
Site Code : 00000000
Start Date : 5/15/2018
Page No : 1

Groups Printed- Vehicles

	Sunset Blvd Southbound			Westbound			Sunset Blvd Northbound			Marion Ave Eastbound			
Start Time	Left	Thru	Right	Left	Thru	Right	Left	Thru	Right	Left	Thru	Right	Int. Total
07:00 AM	0	421	5	0	0	0	22	209	0	0	0	5	662
07:15 AM	0	436	10	0	0	0	24	252	0	2	0	8	732
07:30 AM	0	470	16	0	0	0	19	273	0	6	0	17	801
07:45 AM	0	487	15	0	0	0	19	280	0	6	0	9	816
Total	0	1814	46	0	0	0	84	1014	0	14	0	39	3011
08:00 AM	0	481	17	0	0	0	22	222	0	5	0	6	753
08:15 AM	0	543	17	0	0	0	13	200	0	6	0	13	792
08:30 AM	0	498	17	0	0	0	26	200	0	5	0	11	757
08:45 AM	0	540	7	0	0	0	28	206	0	2	0	17	800
Total	0	2062	58	0	0	0	89	828	0	18	0	47	3102
09:00 AM	0	498	14	0	0	0	26	194	0	3	0	11	746
09:15 AM	0	511	10	0	0	0	22	209	0	2	0	17	771
09:30 AM	0	410	13	0	0	0	26	252	0	11	0	10	722
09:45 AM	0	366	9	0	0	0	19	209	0	8	0	11	622
Total	0	1785	46	0	0	0	93	864	0	24	0	49	2861
03:00 PM	0	275	11	0	0	0	23	315	0	5	0	14	643
03:15 PM	0	281	15	0	0	0	27	350	0	8	0	18	699
03:30 PM	0	264	9	0	0	0	19	331	0	7	0	13	643
03:45 PM	0	286	16	0	0	0	20	369	0	7	0	30	728
Total	0	1106	51	0	0	0	89	1365	0	27	0	75	2713
04:00 PM	0	297	13	0	0	0	24	390	0	10	0	18	752
04:15 PM	0	292	11	0	0	0	22	401	0	26	0	31	783
04:30 PM	0	284	9	0	0	0	16	399	0	29	0	22	759
04:45 PM	0	324	8	0	0	0	23	362	0	49	0	18	784
Total	0	1197	41	0	0	0	85	1552	0	114	0	89	3078
05:00 PM	0	321	9	0	0	0	13	401	0	48	0	40	832
05:15 PM	0	277	17	0	0	0	14	343	0	50	0	29	730
05:30 PM	0	289	16	0	0	0	30	375	0	38	0	28	776
05:45 PM	0	283	7	0	0	0	22	411	0	38	0	28	789
Total	0	1170	49	0	0	0	79	1530	0	174	0	125	3127
Grand Total	0	9134	291	0	0	0	519	7153	0	371	0	424	17892
Apprch %	0	96.9	3.1	0	0	0	6.8	93.2	0	46.7	0	53.3	
Total %	0	51.1	1.6	0	0	0	2.9	40	0	2.1	0	2.4	

CITY TRAFFIC COUNTERS

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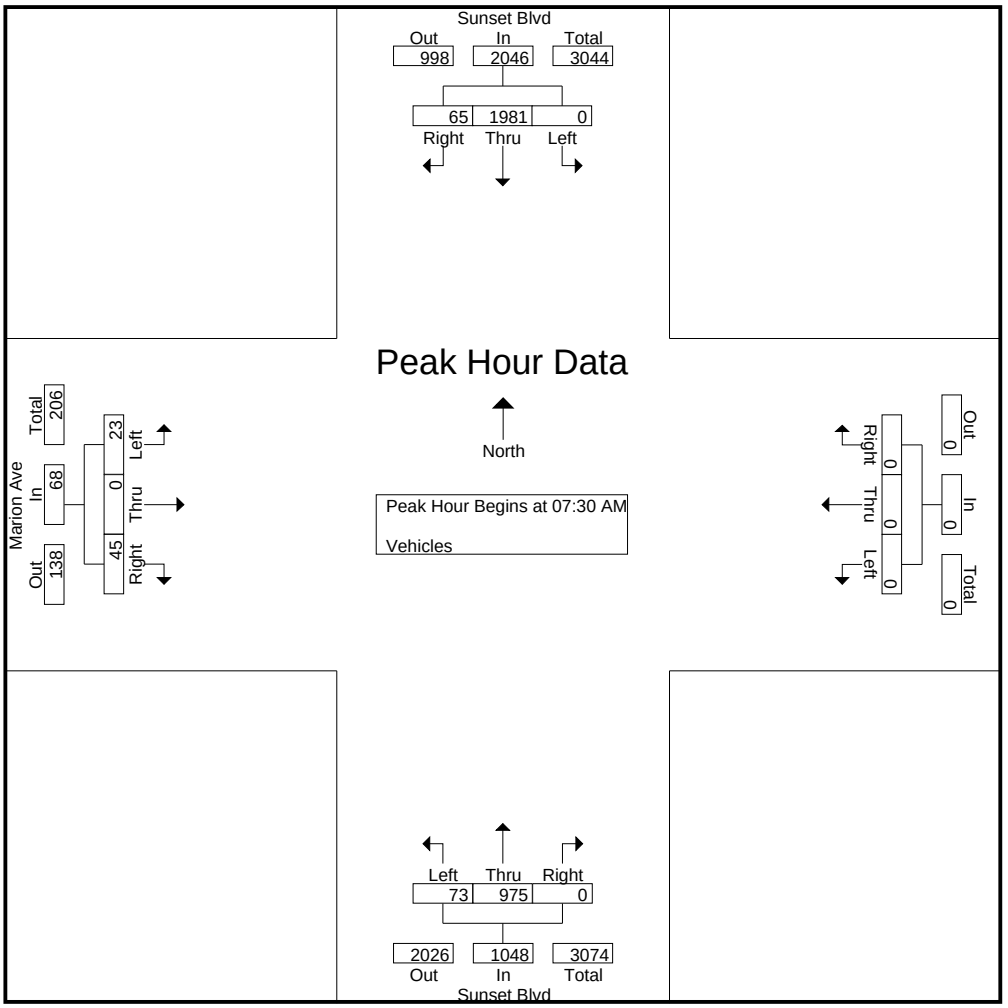
File Name : Sunset_Marion
Site Code : 00000000
Start Date : 5/15/2018
Page No : 2

	Sunset Blvd Southbound				Westbound				Sunset Blvd Northbound				Marion Ave Eastbound				
Start Time	Left	Thru	Right	App. Total	Left	Thru	Right	App. Total	Left	Thru	Right	App. Total	Left	Thru	Right	App. Total	Int. Total
Peak Hour Analysis From 07:00 AM to 11:45 AM - Peak 1 of 1																	
Peak Hour for Entire Intersection Begins at 07:30 AM																	
07:30 AM	0	470	16	486	0	0	0	0	19	273	0	292	**6**	0	**17**	**23**	801
07:45 AM	0	487	15	502	0	0	0	0	19	**280**	0	**299**	6	0	9	15	**816**
08:00 AM	0	481	**17**	498	0	0	0	0	**22**	222	0	244	5	0	6	11	753
08:15 AM	0	**543**	17	**560**	0	0	0	0	13	200	0	213	6	0	13	19	792
Total Volume	0	1981	65	2046	0	0	0	0	73	975	0	1048	23	0	45	68	3162
% App. Total	0	96.8	3.2		0	0	0		7	93	0		33.8	0	66.2		
PHF	.000	.912	.956	.913	.000	.000	.000	.000	.830	.871	.000	.876	.958	.000	.662	.739	.969



CITY TRAFFIC COUNTERS

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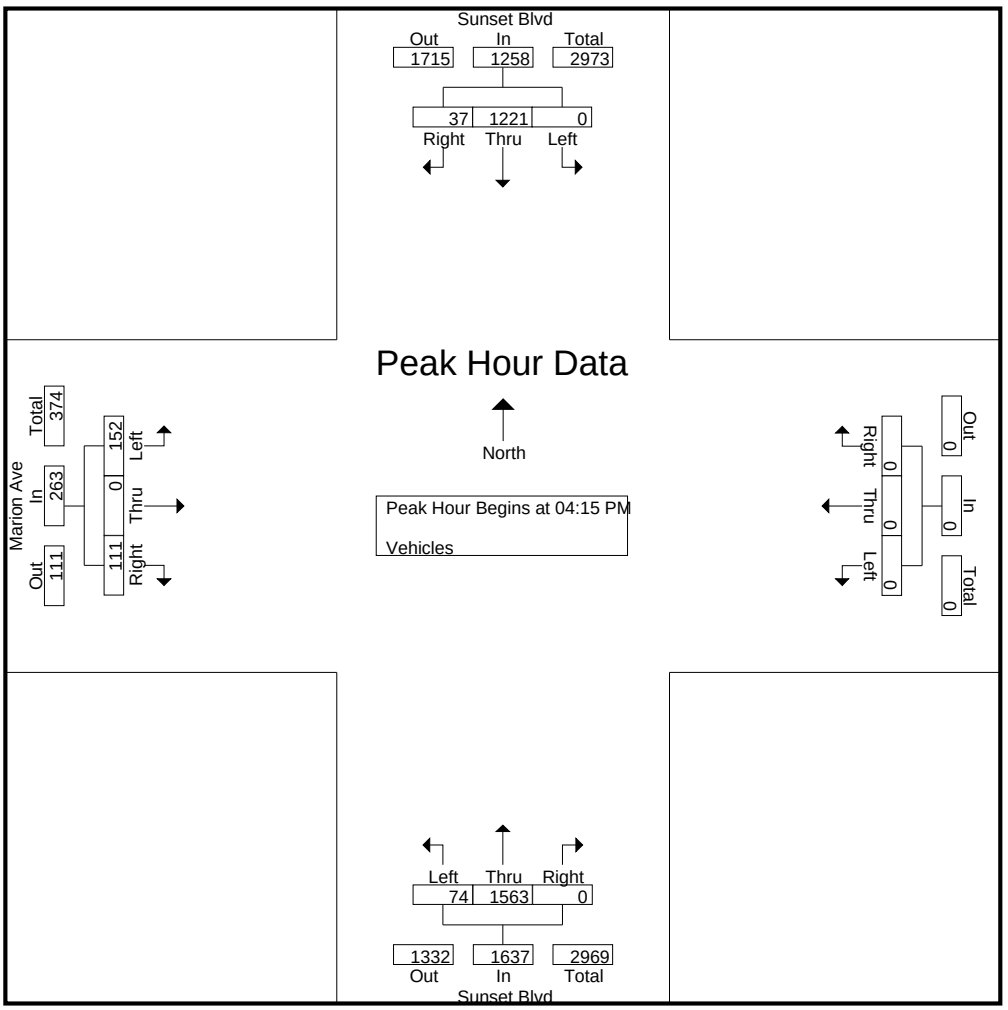
File Name : Sunset_Marion
Site Code : 00000000
Start Date : 5/15/2018
Page No : 3

	Sunset Blvd Southbound				Westbound				Sunset Blvd Northbound				Marion Ave Eastbound				
Start Time	Left	Thru	Right	App. Total	Left	Thru	Right	App. Total	Left	Thru	Right	App. Total	Left	Thru	Right	App. Total	Int. Total
Peak Hour Analysis From 12:00 PM to 05:45 PM - Peak 1 of 1																	
Peak Hour for Entire Intersection Begins at 04:15 PM																	
04:15 PM	0	292	**11**	303	0	0	0	0	22	**401**	0	**423**	26	0	31	57	783
04:30 PM	0	284	9	293	0	0	0	0	16	399	0	415	29	0	22	51	759
04:45 PM	0	**324**	8	**332**	0	0	0	0	**23**	362	0	385	**49**	0	18	67	784
05:00 PM	0	321	9	330	0	0	0	0	13	401	0	414	48	0	**40**	**88**	**832**
Total Volume	0	1221	37	1258	0	0	0	0	74	1563	0	1637	152	0	111	263	3158
% App. Total	0	97.1	2.9		0	0	0		4.5	95.5	0		57.8	0	42.2		
PHF	.000	.942	.841	.947	.000	.000	.000	.000	.804	.974	.000	.967	.776	.000	.694	.747	.949



CITY TRAFFIC COUNTERS

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File Name : Sunset_Marion_BP
Site Code : 00000000
Start Date : 5/15/2018
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Groups Printed- Bikes & Peds

	Sunset Blvd Southbound		Westbound		Sunset Blvd Northbound		Marion Ave Eastbound		
Start Time	Thru	Peds	Thru	Peds	Thru	Peds	Thru	Peds	Int. Total
07:00 AM	0	0	1	1	0	4	1	0	7
07:15 AM	0	8	4	4	0	2	0	2	20
07:30 AM	0	6	10	2	0	1	0	6	25
07:45 AM	0	5	8	4	0	10	2	4	33
Total	0	19	23	11	0	17	3	12	85
08:00 AM	0	1	0	3	1	1	0	2	8
08:15 AM	0	3	3	2	0	1	0	4	13
08:30 AM	0	3	5	3	0	2	0	1	14
08:45 AM	0	2	2	3	0	0	0	3	10
Total	0	9	10	11	1	4	0	10	45
09:00 AM	0	3	7	3	0	7	0	6	26
09:15 AM	0	1	0	6	0	3	3	3	16
09:30 AM	0	1	1	1	0	0	0	3	6
09:45 AM	0	0	1	3	0	5	0	2	11
Total	0	5	9	13	0	15	3	14	59
03:00 PM	0	2	1	6	0	1	2	1	13
03:15 PM	0	2	1	2	0	3	1	2	11
03:30 PM	0	1	2	5	0	2	1	3	14
03:45 PM	0	0	7	4	0	1	1	5	18
Total	0	5	11	17	0	7	5	11	56
04:00 PM	0	4	1	7	0	1	2	0	15
04:15 PM	0	2	1	9	0	4	0	5	21
04:30 PM	0	6	6	1	0	1	2	1	17
04:45 PM	0	1	0	3	0	2	3	4	13
Total	0	13	8	20	0	8	7	10	66
05:00 PM	0	5	0	5	0	0	2	4	16
05:15 PM	0	1	2	7	0	2	2	5	19
05:30 PM	0	2	2	5	0	2	3	5	19
05:45 PM	0	2	1	10	0	2	1	9	25
Total	0	10	5	27	0	6	8	23	79
Grand Total	0	61	66	99	1	57	26	80	390
Apprch %	0	100	40	60	1.7	98.3	24.5	75.5	
Total %	0	15.6	16.9	25.4	0.3	14.6	6.7	20.5	

CITY TRAFFIC COUNTERS

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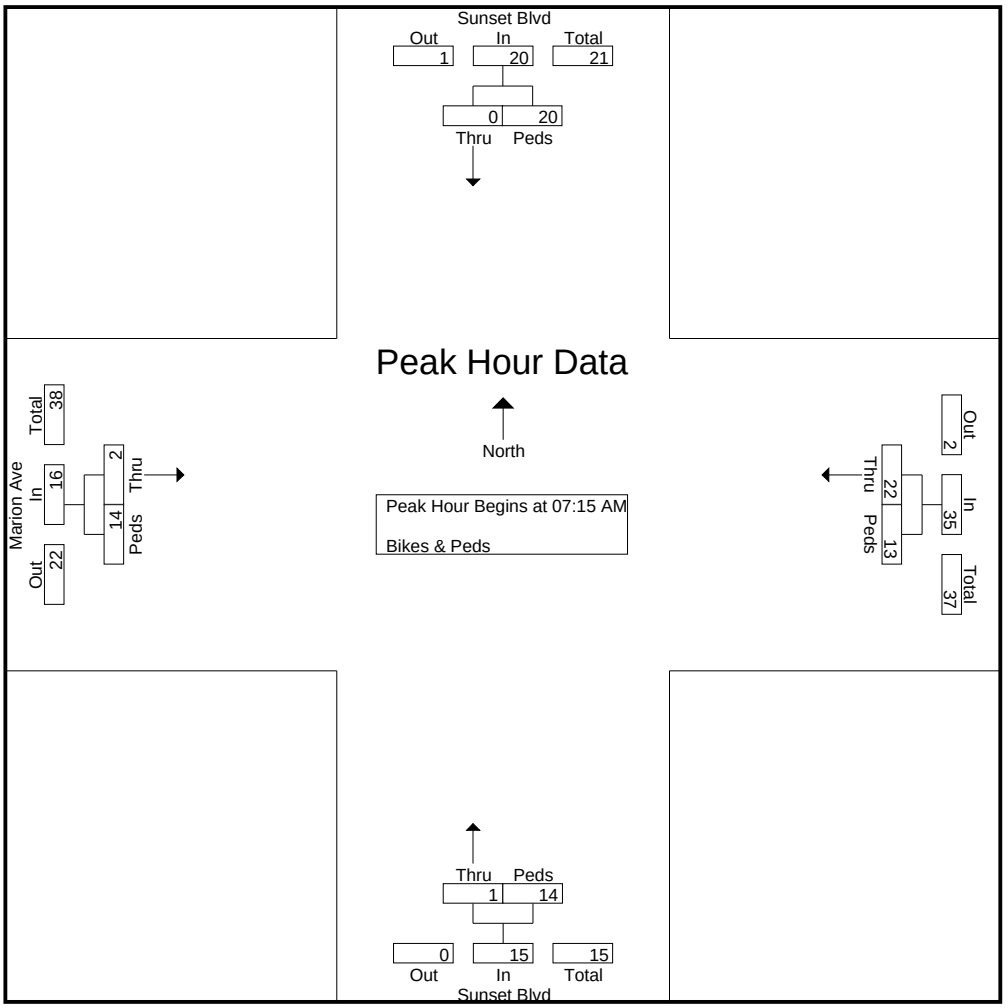
File Name : Sunset_Marion_BP
Site Code : 00000000
Start Date : 5/15/2018
Page No : 2

	Sunset Blvd Southbound			Westbound			Sunset Blvd Northbound			Marion Ave Eastbound			
Start Time	Thru	Peds	App. Total	Thru	Peds	App. Total	Thru	Peds	App. Total	Thru	Peds	App. Total	Int. Total
Peak Hour Analysis From 07:00 AM to 11:45 AM - Peak 1 of 1													
Peak Hour for Entire Intersection Begins at 07:15 AM													
07:15 AM	0	**8**	**8**	4	**4**	8	0	2	2	0	2	2	20
07:30 AM	0	6	6	**10**	2	**12**	0	1	1	0	**6**	**6**	25
07:45 AM	0	5	5	8	4	12	0	**10**	**10**	**2**	4	6	**33**
08:00 AM	0	1	1	0	3	3	**1**	1	2	0	2	2	8
Total Volume	0	20	20	22	13	35	1	14	15	2	14	16	86
% App. Total	0	100		62.9	37.1		6.7	93.3		12.5	87.5		
PHF	.000	.625	.625	.550	.813	.729	.250	.350	.375	.250	.583	.667	.652



CITY TRAFFIC COUNTERS

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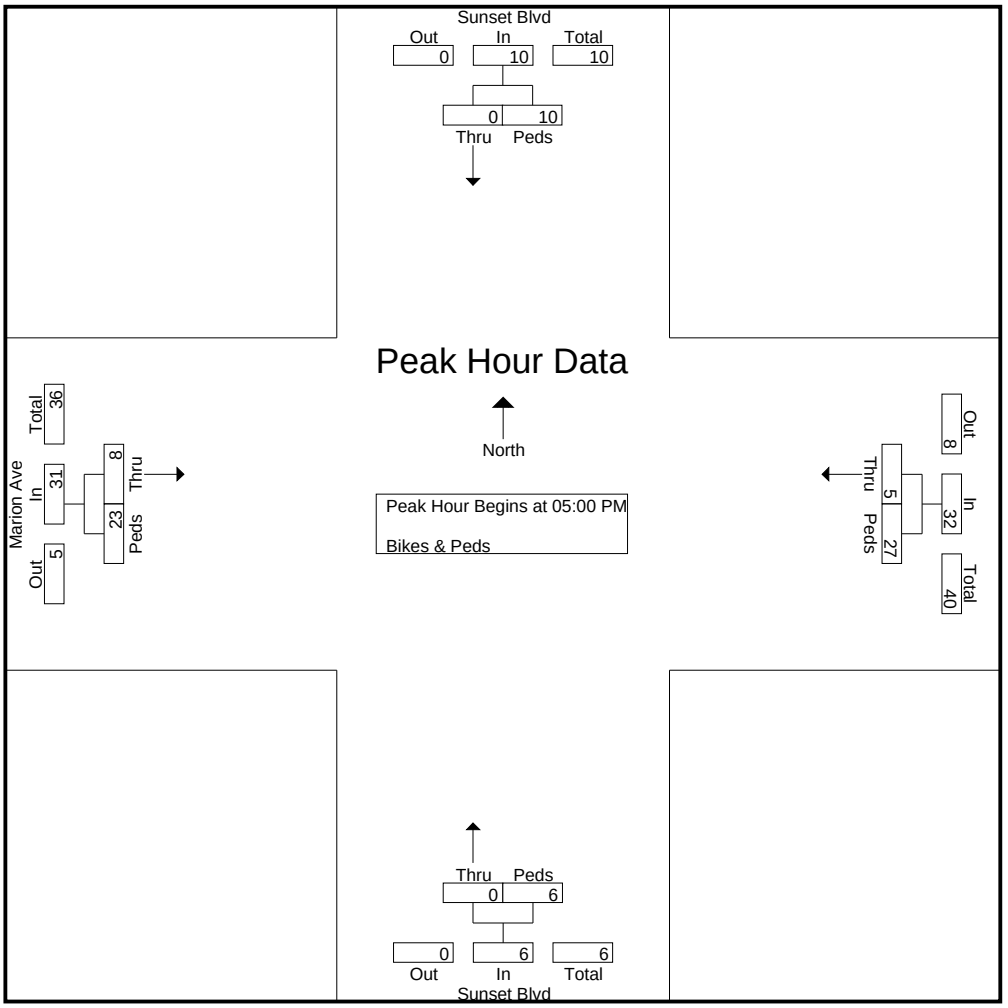
File Name : Sunset_Marion_BP
Site Code : 00000000
Start Date : 5/15/2018
Page No : 3

	Sunset Blvd Southbound			Westbound			Sunset Blvd Northbound			Marion Ave Eastbound			
Start Time	Thru	Peds	App. Total	Thru	Peds	App. Total	Thru	Peds	App. Total	Thru	Peds	App. Total	Int. Total
Peak Hour Analysis From 12:00 PM to 05:45 PM - Peak 1 of 1													
Peak Hour for Entire Intersection Begins at 05:00 PM													
05:00 PM	0	**5**	**5**	0	5	5	0	0	0	2	4	6	16
05:15 PM	0	1	1	**2**	7	9	0	**2**	**2**	2	5	7	19
05:30 PM	0	2	2	2	5	7	0	2	2	**3**	5	8	19
05:45 PM	0	2	2	1	**10**	**11**	0	2	2	1	**9**	**10**	**25**
Total Volume	0	10	10	5	27	32	0	6	6	8	23	31	79
% App. Total	0	100		15.6	84.4		0	100		25.8	74.2		
PHF	.000	.500	.500	.625	.675	.727	.000	.750	.750	.667	.639	.775	.790



APPENDIX B

Level of Service Calculations

Level of Service Worksheet
(Circular 212 Method)

I/S #	North-South Street	Year of Count	Ambient Growth: (%)	Conducted by	Date
1	Sunset Boulevard	2018	1	TA	7/30/2018
	East-West Street: Vin Scully Avenue	Projection Year: 2019	Peak Hour: 7:30 AM	Reviewed by: JB	Project: 1251 Sunset Blvd

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
No. of Phases			3			3			3				3				3	
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0				0	
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB-- 3	SB-- 0	0	NB-- 3	SB-- 0	0	NB-- 3	SB-- 0	0		NB-- 3	SB-- 0	0		NB-- 3	SB-- 0	0	
	EB-- 0	WB-- 3	3	EB-- 0	WB-- 3	3	EB-- 0	WB-- 3	3		EB-- 0	WB-- 3	3		EB-- 0	WB-- 3	3	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2				2	
Override Capacity			0			0			0				0				0	

MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Left-Through		0							0				0				0	
Through	974	2	**487**	8	982	**491**	282	1266	2	**633**	8	1274	2	**637**	0	1274	2	**637**
Through-Right		0							0				0				0	
Right	67	1	0	3	70	0	60	128	1	0	3	131	1	0	0	131	1	0
Left-Through-Right		0							0				0				0	
Left-Right		0							0				0				0	
SOUTHBOUND																		
Left	75	1	**75**	0	75	**75**	9	85	1	**85**	0	85	1	**85**	0	85	1	**85**
Left-Through		0							0				0				0	
Through	1015	2	508	2	1017	509	173	1198	2	599	2	1200	2	600	0	1200	2	600
Through-Right		0							0				0				0	
Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Left-Through-Right		0							0				0				0	
Left-Right		0							0				0				0	
EASTBOUND																		
Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Left-Through		0							0				0				0	
Through	0	0	**0**	0	0	**0**	0	0	0	**0**	0	0	0	**0**	0	0	0	**0**
Through-Right		0							0				0				0	
Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Left-Through-Right		0							0				0				0	
Left-Right		0							0				0				0	
WESTBOUND																		
Left	1131	2	**622**	1	1132	**623**	100	1242	2	**683**	1	1243	2	**684**	0	1243	2	**684**
Left-Through		0							0				0				0	
Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Through-Right		0							0				0				0	
Right	159	2	12	0	159	12	36	197	2	23	0	197	2	23	0	197	2	23
Left-Through-Right		0							0				0				0	
Left-Right		0							0				0				0	
CRITICAL VOLUMES	*North-South:*		562	*North-South:*		566	*North-South:*			718	*North-South:*			722	*North-South:*			722
	East-West:		622	*East-West:*		623	*East-West:*			683	*East-West:*			684	*East-West:*			684
	SUM:		1184	*SUM:*		1189	*SUM:*			1401	*SUM:*			1406	*SUM:*			1406
VOLUME/CAPACITY *(V/C)* RATIO:			0.831			0.834				0.983				0.987				0.987
V/C LESS ATSAC/ATCS ADJUSTMENT:			0.731			0.734				0.883				0.887				0.887
LEVEL OF SERVICE (LOS):			C			C				D				D				D

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.004 — Δ*v/c* after mitigation: 0.004

Significant impacted? NO — Fully mitigated? N/A

Level of Service Worksheet
(Circular 212 Method)

I/S #	North-South Street	Sunset Boulevard	Year of Count:	2018	Ambient Growth: (%):	1	Conducted by:	TA	Date:	7/30/2018
1	East-West Street:	Vin Scully Avenue	Projection Year:	2019	Peak Hour:	4:45 PM	Reviewed by:	JB	Project:	1251 Sunset Blvd

	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
No. of Phases			3			3			3				3				3	
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0				0				0	
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	3 SB--	0	NB--	3 SB--	0	NB--	3 SB--	0		NB--	3 SB--	0		NB--	3 SB--	0	
	EB--	0 WB--	3	EB--	0 WB--	3	EB--	0 WB--	3		EB--	0 WB--	3		EB--	0 WB--	3	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2				2				2	
Override Capacity			0			0			0				0				0	

	MOVEMENT	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Left-Through		0							0				0				0	
	Through	840	2	420	4	844	422	234	1082	2	541	4	1086	2	543	0	1086	2	543
	Through-Right		0							0				0				0	
	Right	998	1	**763**	2	1000	**763**	105	1113	1	**830**	2	1115	1	**830**	0	1115	1	**830**
	Left-Through-Right		0							0				0				0	
	Left-Right		0							0				0				0	
SOUTHBOUND	Left	113	1	**113**	0	113	**113**	36	150	1	**150**	0	150	1	**150**	0	150	1	**150**
	Left-Through		0							0				0				0	
	Through	776	2	388	6	782	391	302	1086	2	543	6	1092	2	546	0	1092	2	546
	Through-Right		0							0				0				0	
	Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Left-Through-Right		0							0				0				0	
	Left-Right		0							0				0				0	
EASTBOUND	Left	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Left-Through		0							0				0				0	
	Through	0	0	**0**	0	0	**0**	0	0	0	**0**	0	0	0	**0**	0	0	0	**0**
	Through-Right		0							0				0				0	
	Right	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Left-Through-Right		0							0				0				0	
	Left-Right		0							0				0				0	
WESTBOUND	Left	428	2	**235**	3	431	**237**	83	515	2	**283**	3	518	2	**285**	0	518	2	**285**
	Left-Through		0							0				0				0	
	Through	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Through-Right		0							0				0				0	
	Right	92	2	0	0	92	0	21	114	2	0	0	114	2	0	0	114	2	0
	Left-Through-Right		0							0				0				0	
	Left-Right		0							0				0				0	
CRITICAL VOLUMES		North-South:		876	North-South:		876	North-South:			980	North-South:			980	North-South:			980
		East-West:		235	East-West:		237	East-West:			283	East-West:			285	East-West:			285
		SUM:		1111	SUM:		1113	SUM:			1263	SUM:			1265	SUM:			1265
VOLUME/CAPACITY (V/C) RATIO:				0.780			0.781				0.886				0.888				0.888
V/C LESS ATSAC/ATCS ADJUSTMENT:				**0.680**			**0.681**				**0.786**				**0.788**				**0.788**
LEVEL OF SERVICE (LOS):				**B**			**B**				**C**				**C**				**C**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project: 0.002 — Δ*v/c* after mitigation: 0.002

Significant impacted? NO — Fully mitigated? N/A

Level of Service Worksheet
(Circular 212 Method)

I/S #:	North-South Street:	Sunset Boulevard	Year of Count:	2018	Ambient Growth: (%):	1	Conducted by:	TA	Date:	7/30/2018
2	East-West Street:	Marion Avenue	Projection Year:	2019	Peak Hour:	7:30 AM	Reviewed by:	JB	Project:	1251 Sunset Blvd

No. of Phases			2			2			2			2			2			2	
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0			0	
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2			2	
Override Capacity			0			0			0			0			0			0	

MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	73	1	**73**	0	73	**73**	20	94	1	**94**	0	94	1	**94**	0	94	1	**94**
Left-Through		0							0				0				0	
Through	975	2	488	3	978	489	282	1267	2	634	3	1270	2	635	0	1270	2	635
Through-Right		0							0				0				0	
Right	0	1	0	0	0	0	28	28	1	28	0	28	1	28	0	28	1	28
Left-Through-Right		0							0				0				0	
Left-Right		0							0				0				0	
SOUTHBOUND																		
Left	0	1	0	0	0	0	16	16	1	16	0	16	1	16	0	16	1	16
Left-Through		0							0				0				0	
Through	1981	2	**991**	9	1990	**995**	280	2281	2	**1141**	9	2290	2	**1145**	0	2290	2	**1145**
Through-Right		0							0				0				0	
Right	65	1	54	2	67	55	3	69	1	55	2	71	1	57	0	71	1	57
Left-Through-Right		0							0				0				0	
Left-Right		0							0				0				0	
EASTBOUND																		
Left	23	1	**23**	1	24	**24**	5	28	1	**28**	1	29	1	**29**	0	29	1	**29**
Left-Through		0							0				0				0	
Through	0	0	0	0	0	0	13	13	0	0	0	13	0	0	0	13	0	0
Through-Right		0							0				0				0	
Right	45	1	9	0	45	9	7	52	1	5	0	52	1	5	0	52	1	5
Left-Through-Right		0							0				0				0	
Left-Right		0							0				0				0	
WESTBOUND																		
Left	0	0	0	0	0	0	44	44	0	44	0	44	0	44	0	44	0	44
Left-Through		0							0				0				0	
Through	0	0	**0**	0	0	**0**	16	16	0	**83**	0	16	0	**83**	0	16	0	**83**
Through-Right		0							0				0				0	
Right	0	0	0	0	0	0	23	23	0	0	0	23	0	0	0	23	0	0
Left-Through-Right		1							1				1				1	
Left-Right		0							0				0				0	
CRITICAL VOLUMES	*North-South:*		1064	*North-South:*		1068	*North-South:*			1235	*North-South:*			1239	*North-South:*			1239
	East-West:		23	*East-West:*		24	*East-West:*			111	*East-West:*			112	*East-West:*			112
	SUM:		1087	*SUM:*		1092	*SUM:*			1346	*SUM:*			1351	*SUM:*			1351
VOLUME/CAPACITY *(V/C)* RATIO:			0.725			0.728				0.897				0.901				0.901
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.625**			**0.628**				**0.797**				**0.801**				**0.801**
LEVEL OF SERVICE (LOS):			**B**			**B**				**C**				**D**				**D**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.004	*Δv/c* after mitigation:	0.004
Significant impacted?	NO	Fully mitigated?	N/A

Level of Service Worksheet
(Circular 212 Method)

I/S #:	North-South Street:	Sunset Boulevard	Year of Count:	2018	Ambient Growth: (%):	1	Conducted by:	TA	Date:	7/30/2018
2	East-West Street:	Marion Avenue	Projection Year:	2019	Peak Hour:	4:15 PM	Reviewed by:	JB	Project:	1251 Sunset Blvd

No. of Phases			2			2			2			2			2			2	
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?			0			0			0			0			0			0	
Right Turns: FREE-1, NRTOR-2 or OLA-3?	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	NB--	0	SB-- 0	
	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	EB--	0	WB-- 0	
ATSAC-1 or ATSAC+ATCS-2?			2			2			2			2			2			2	
Override Capacity			0			0			0			0			0			0	

MOVEMENT	EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
	Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND																		
Left	74	1	74	0	74	74	12	87	1	87	0	87	1	87	0	87	1	87
Left-Through		0							0				0				0	
Through	1563	2	**782**	10	1573	**787**	346	1925	2	**963**	10	1935	2	**968**	0	1935	2	**968**
Through-Right		0							0				0				0	
Right	0	1	0	0	0	0	32	32	1	32	0	32	1	32	0	32	1	32
Left-Through-Right		0							0				0				0	
Left-Right		0							0				0				0	
SOUTHBOUND																		
Left	0	1	**0**	0	0	**0**	14	14	1	**14**	0	14	1	**14**	0	14	1	**14**
Left-Through		0							0				0				0	
Through	1221	2	611	6	1227	614	355	1588	2	794	6	1594	2	797	0	1594	2	797
Through-Right		0							0				0				0	
Right	37	1	0	1	38	0	5	42	1	0	1	43	1	0	0	43	1	0
Left-Through-Right		0							0				0				0	
Left-Right		0							0				0				0	
EASTBOUND																		
Left	152	1	**152**	2	154	**154**	10	164	1	**164**	2	166	1	**166**	0	166	1	**166**
Left-Through		0							0				0				0	
Through	0	0	0	0	0	0	12	12	0	0	0	12	0	0	0	12	0	0
Through-Right		0							0				0				0	
Right	111	1	74	0	111	74	12	124	1	81	0	124	1	81	0	124	1	81
Left-Through-Right		0							0				0				0	
Left-Right		0							0				0				0	
WESTBOUND																		
Left	0	0	0	0	0	0	23	23	0	23	0	23	0	23	0	23	0	23
Left-Through		0							0				0				0	
Through	0	0	**0**	0	0	**0**	8	8	0	**43**	0	8	0	**43**	0	8	0	**43**
Through-Right		0							0				0				0	
Right	0	0	0	0	0	0	12	12	0	0	0	12	0	0	0	12	0	0
Left-Through-Right		1							1				1				1	
Left-Right		0							0				0				0	
CRITICAL VOLUMES		*North-South:*	782		*North-South:*	787		*North-South:*		977		*North-South:*		982		*North-South:*		982
		East-West:	152		*East-West:*	154		*East-West:*		207		*East-West:*		209		*East-West:*		209
		SUM:	934		*SUM:*	941		*SUM:*		1184		*SUM:*		1191		*SUM:*		1191
VOLUME/CAPACITY *(V/C)* RATIO:			0.623			0.627				0.789				0.794				0.794
V/C LESS ATSAC/ATCS ADJUSTMENT:			**0.523**			**0.527**				**0.689**				**0.694**				**0.694**
LEVEL OF SERVICE (LOS):			**A**			**A**				**B**				**B**				**B**

REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.005	Δ*v/c* after mitigation:	0.005
Significant impacted?	NO	Fully mitigated?	N/A

Noise Study

for the

1251 W. Sunset Boulevard Project

Prepared for

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1332 S. St. Joseph Pl.
Los Angeles, CA 90015

Prepared by

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August 2018

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EXECUTIVE SUMMARY

This Noise Study assesses and discusses the potential noise and vibration impacts that may occur with the implementation of the 1251 W. Sunset Boulevard Apartment Project (Project), located in the City of Los Angeles, California. The analysis describes the existing environment in the Project area; estimates future noise and vibration levels at surrounding land uses resulting from construction and operation of the Project; and identified the potential for significant impacts. An evaluation of the Project's contribution to potential cumulative noise impacts is also provided. The study summarizes the potential for the Project to conflict with applicable noise and vibration regulations, standards, and thresholds. The findings of the analyses are as follows:

- Construction activities would potentially result in short-term and temporary noise impacts to nearby noise-sensitive receptors due to on-site construction equipment and activities. Implementation of noise-attenuation techniques and placement of the construction-staging area and earthmoving equipment away from noise-sensitive sites would lower construction noise levels.
- Construction of the Project would generate sporadic, temporary vibration effects adjacent to the Project area but would not be expected to exceed the significance thresholds.
- Operation of the Project would generate noise from Project-related traffic or from on-site sources (parking, refuse collection area, mechanical equipment) that would not exceed the significance thresholds.
- Noise associated with cumulative construction activities would be reduced to the degree reasonably and technically feasible through proposed recommended measures for each individual project and compliance with locally adopted and enforced noise ordinances. Given that construction activities would be required to comply with the City's allowable hours and would be temporary, construction-related noise would not be significant.
- Noise associated with cumulative operational sources would not be significant.
- Due to the rapid attenuation characteristics of ground-borne vibration and the distance of the cumulative projects to the Project site, no potential exists for cumulative construction- or operational-related impacts with respect to ground-borne vibration.

INTRODUCTION

The purpose of this noise study is to assess and discuss the impact of potential noise impacts that may occur with the implementation of the 1251 W. Sunset Boulevard Apartment Project (Project), located in Los Angeles, California. The noise report analyzes short-term noise and ground-borne vibration impacts associated with the Project. The report also discusses the applicable federal, state, and local noise and vibration regulations; the applicable noise and vibration thresholds; the methodology used to analyze potential noise and vibration impacts; and the modeled roadway noise.

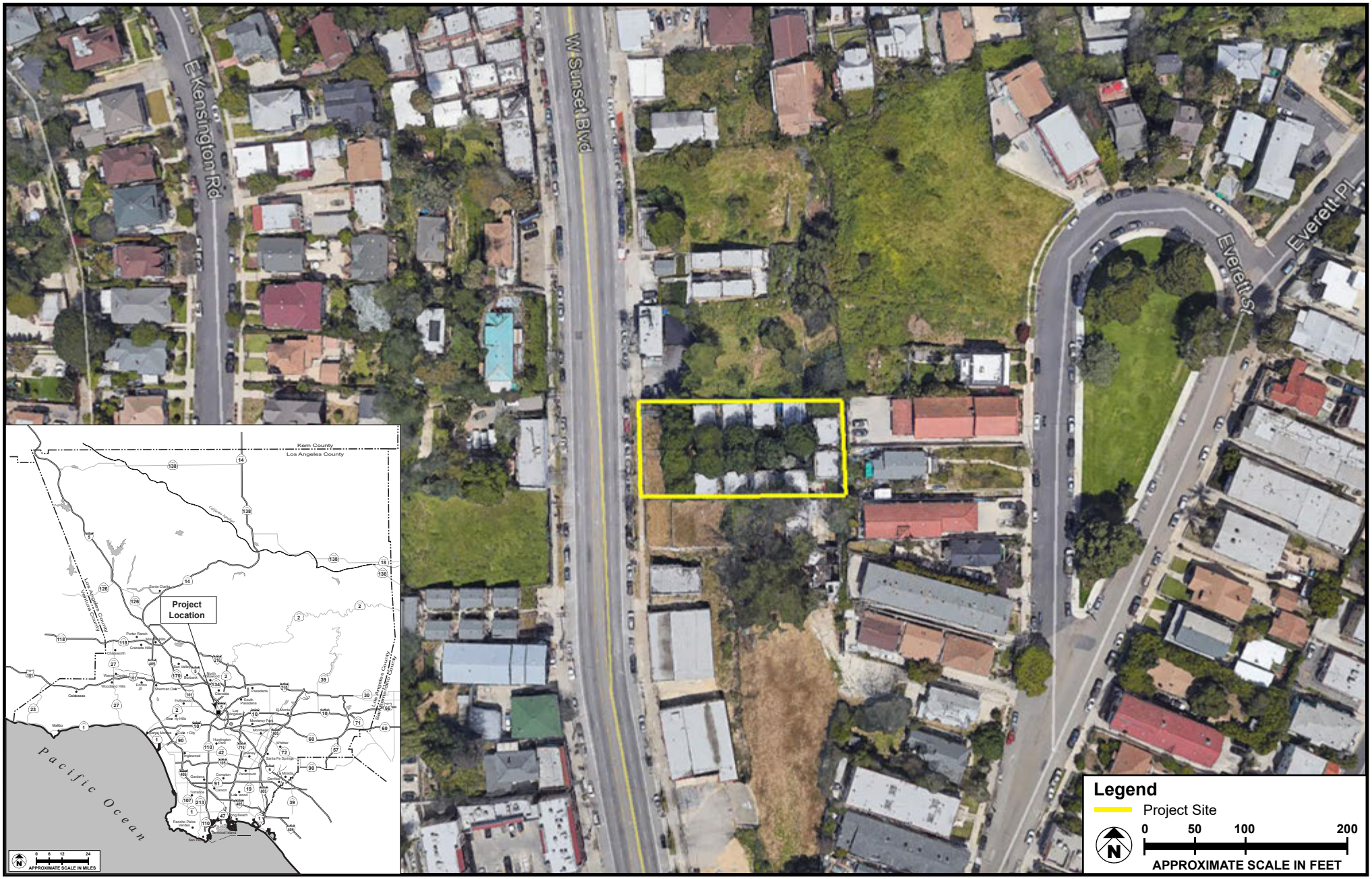
Project Description

The Project is located at an occupied 0.46-acre lot at 1251 W. Sunset Boulevard (Project site), in the City of Los Angeles (City), north of Marion Avenue and south of Innes Avenue, as shown in **Figure 1: Regional and Local Vicinity Map**. The Project site currently consists of a total of 10 multifamily residential units, (Assessor Parcel Number 5406-016-026 and 5406-015-001) totaling 5,280 square feet. The proposed Project consists of the demolition of existing uses and the construction of a 75-unit multifamily residential building, including 7,530 square feet of open space and a 37-space parking garage. The proposed Project would also include 75 long-term and 8 short-term bicycle parking spaces. Construction of the Project is expected to begin in March 2019 and is anticipated to be completed by early 2021.

NOISE DESCRIPTORS

Fundamentals of Sound

Because the human ear does not respond uniformly to sounds at all frequencies, sound-pressure level alone is not a reliable indicator of loudness. For example, the human ear is less sensitive to low and high frequencies than to the medium frequencies that more closely correspond to human speech. In response to the sensitivity of the human ear to certain sound frequencies, the A-weighted noise level, referenced in units of dBA, was developed to better correspond with people's subjective judgment of sound levels. To support assessing a community reaction to noise, scales have been developed that average sound-pressure levels over time and quantify the result in terms of a single numerical descriptor. Several scales have been developed that address community noise levels. The equivalent sound level (Leq) is the average A-weighted sound level measured over a given time interval. Leq can be measured over any period but is typically measured for 1-minute, 15-minute, 1-hour, or 24-hour periods.



SOURCE: Google Earth - 2018

FIGURE **1**

Meridian Consultants

Regional and Local Vicinity Map

219-001-18

Table 1: Noise Descriptors identifies various noise descriptors developed to measure sound levels over different periods of time.

Table 1
Noise Descriptors

Term	Definition
Decibel (dB)	The unit for measuring the volume of sound equal to 10 times the logarithm (base 10) of the ratio of the pressure of a measure sound to a reference pressure.
A-weighted decibel (dBA)	A sound measurement scale that adjusts the pressure of individual frequencies according to human sensitivities. The scale accounts for the fact that the region of highest sensitivity for the human ear is between 2,000 and 4,000 cycles per second (hertz).
Hertz (Hz)	The frequency of the pressure vibration, which is measured in cycles per second.
Kilo hertz (kHz)	One thousand cycles per second.
Equivalent sound level (Leq)	The sound level containing the same total energy as a time varying signal over a given time period. The Leq is the value that expresses the time averaged total energy of a fluctuating sound level. Leq can be measured over any time period, but is typically measured for 1-minute, 15-minute, 1-hour, or 24-hour periods.
Community noise equivalent level (CNEL)	A rating of community noise exposure to all sources of sound that differentiates between daytime, evening, and nighttime noise exposure. These adjustments add 5 dBA for the evening, 7:00 PM to 10:00 PM, and add 10 dBA for the night, 10:00 PM to 7:00 AM. The 5 and 10 dB penalties are applied to account for increased noise sensitivity during the evening and nighttime hours. The logarithmic effect of adding these penalties to the 1-hour Leq measurements typically results in a CNEL measurement that is within approximately 3 dBA of the peak-hour Leq.[a]
Nighttime (Lnight)	Lnight is the average noise exposure during the hourly periods from 10:00 PM to 7:00 AM.
Sound pressure level	The sound pressure is the force of sound on a surface area perpendicular to the direction of the sound. The sound pressure level is expressed in dB.
Ambient noise	The level of noise that is all encompassing within a given environment, being usually a composite of sounds from many and varied sources near to and far from the observer. No specific source is identified in the ambient environment.

[a] *California Department of Transportation,* Technical Noise Supplement; A Technical Supplement to the Traffic Noise Analysis Protocol, *(Sacramento, California: November 2009), pp. N51–N54.*

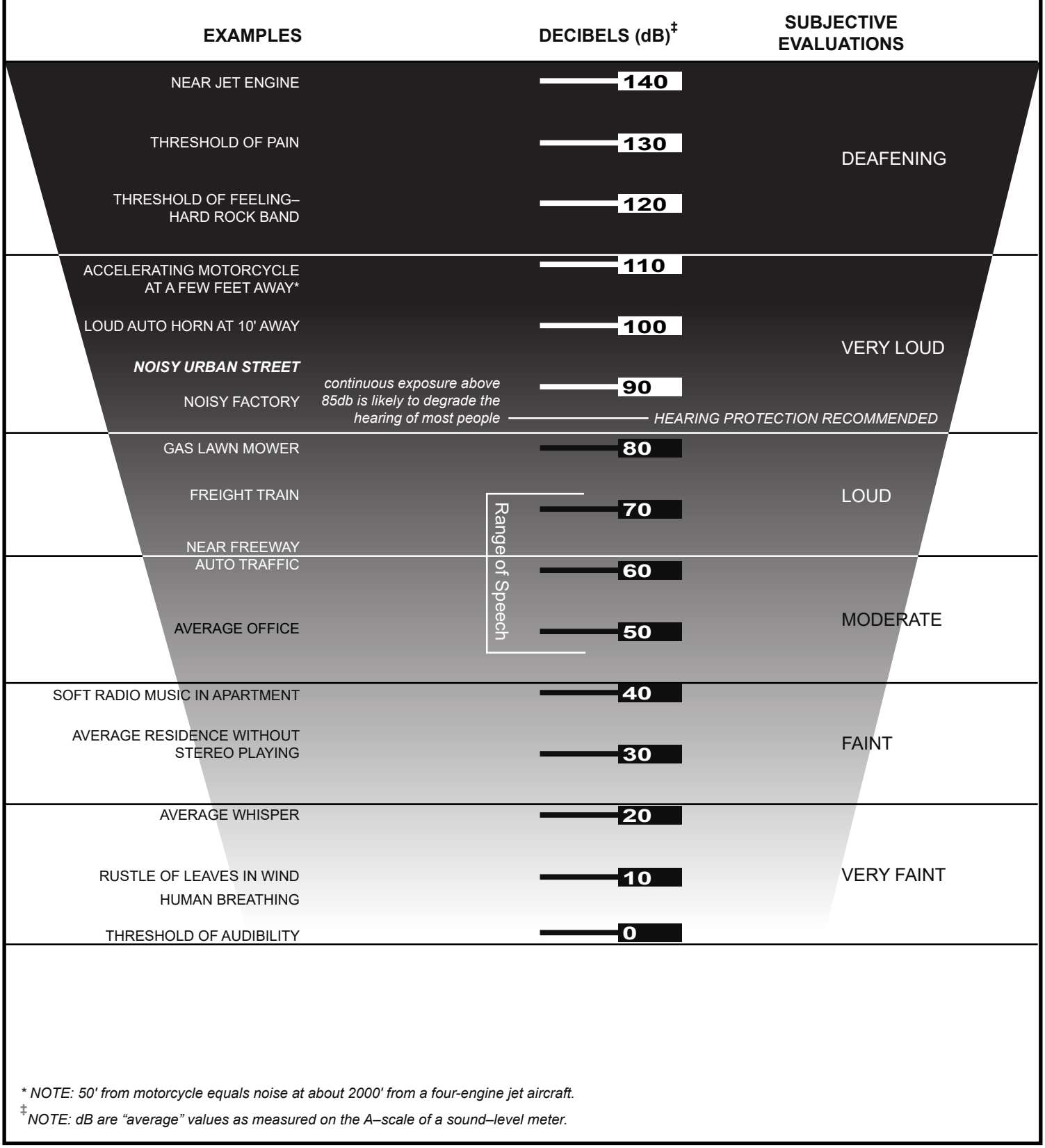
A doubling of sound energy results in a 3 dBA increase in sound, which means that a doubling of sound wave energy (e.g., doubling the volume of traffic on a roadway) would result in a barely perceptible change in sound level. In general, changes in a noise level of less than 3 dBA are not noticed by the human ear.[1] Changes from 3 to 5 dBA may be noticed by some individuals who are extremely sensitive to changes in noise. An increase of greater than 5 dBA is readily noticeable, while the human ear perceives a 10 dBA increase in sound level to be a doubling of sound volume.

Noise sources can generally be categorized in two types: (1) point sources, such as stationary equipment; and (2) line sources, such as a roadway. Sound generated by a point source typically diminishes (attenuates) at a rate of 6 dBA for each doubling of distance from the source to the receptor at acoustically hard sites, and at a rate of 7.5 dBA at acoustically soft sites.[2] A hard, or reflective, site consists of asphalt, concrete, or very hard-packed soil, which does not provide any excess ground-effect attenuation. An acoustically soft or absorptive site is characteristic of normal earth and most ground with vegetation. As an example, a 60-dBA noise level measured at 50 feet from a point source at an acoustically hard site would be 54 dBA at 100 feet from the source and 48 dBA at 200 feet from the source. Noise from the same point source at an acoustically soft site would be 52.5 dBA at 100 feet and 45 dBA at 200 feet from the source. Sound generated by a line source typically attenuates at a rate of 3 dBA and 4.5 dBA per doubling of distance from the source to the receptor for hard and soft sites, respectively.[3] Noise levels generated by a variety of activities are shown in **Figure 2: Common Noise Levels**. Man-made or natural barriers can also attenuate sound levels, as illustrated in **Figure 3: Noise Attenuation by Barriers**.

Fundamentals of Vibration

Vibration is commonly defined as an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. The peak particle velocity (PPV) or root-mean-square (RMS) velocity is usually used to describe vibration amplitudes. PPV is defined as the maximum instantaneous peak of the vibration signal, while RMS is defined as the square root of the average of the squared amplitude of the signal. PPV is typically used for evaluating potential building damage, whereas RMS is typically more suitable for evaluating human response to ground-borne vibration. The RMS vibration velocity level can be presented in inches per second (ips) or in VdB (a decibel unit referenced to 1 microinch per second). Commonly, ground-borne vibration generated by man-made activities (i.e., road traffic, construction) attenuates rapidly with distance from the source of the vibration.

1 US Department of Transportation, Federal Highway Administration (USDOT FHWA), *Fundamentals and Abatement of Highway Traffic Noise* (Springfield, VA: Author, September 1980), 81.
2 USDOT FHWA, *Fundamentals and Abatement,* 97.
3 USDOT FHWA, *Fundamentals and Abatement,* 97.



** NOTE: 50' from motorcycle equals noise at about 2000' from a four-engine jet aircraft.*

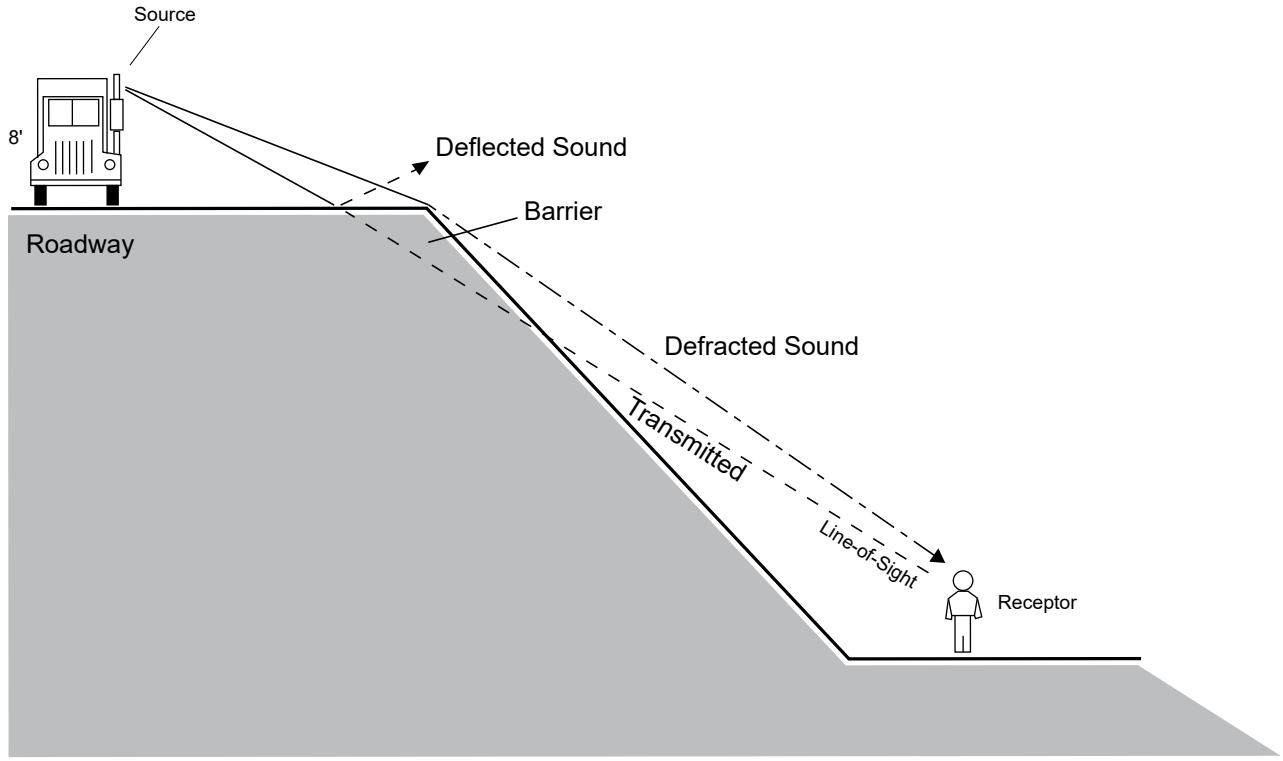
‡ *NOTE: dB are "average" values as measured on the A–scale of a sound–level meter.*

FIGURE **2**

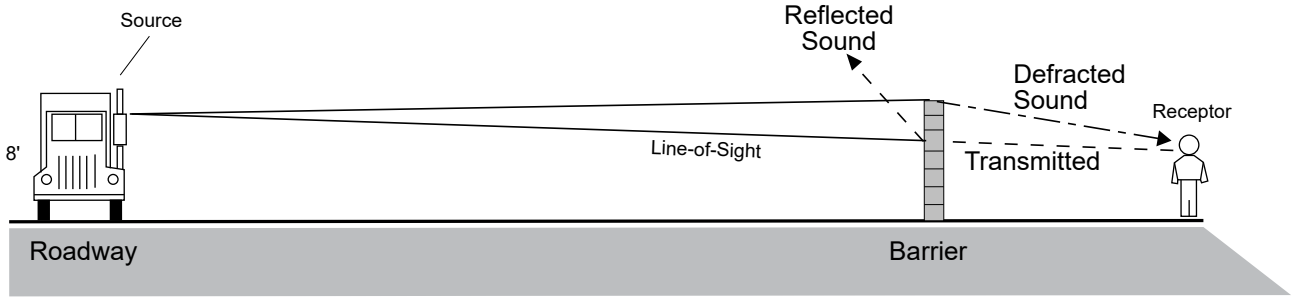
Meridian Consultants

Common Noise Levels

219-001-18



"Barrier Effect" Resulting from Differences in Elevation.



"Barrier Effect" Resulting from Typical Soundwall.

FIGURE **3**

Meridian Consultants

Noise Attenuation by Barriers

219-001-18

The vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for many people. Most perceptible indoor vibration is caused by sources within buildings, such as the operation of mechanical equipment, the movement of people, or the slamming of doors. Typical outdoor sources of perceptible ground-borne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the ground-borne vibration from traffic is barely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration velocity, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings.

SIGNIFICANCE THRESHOLDS

Construction Noise

The *L.A. CEQA Thresholds Guide* defines the following significance thresholds for construction activities lasting more than 10 days in a three-month period or occurring during the hours of 9:00 PM and 7:00 AM Monday through Friday, before 8:00 AM or after 6:00 PM on Saturday, or anytime on Sunday:

- On-site Project construction activities cause the exterior ambient noise level to increase by 5 dBA or more at a noise-sensitive use, as measured at the property line of any sensitive use.
- Off-site Project construction traffic causes the exterior ambient noise level to increase by 5 dBA CNEL or more at a noise-sensitive use, as measured at the property line of any sensitive use.

Operation Noise

Operational noise impacts are evaluated for Project-related off-site roadway traffic noise impacts and on-site stationary source noise from on-site activities and equipment.

- The Project would cause any ambient noise levels to increase by 5 dBA CNEL or more and the resulting noise falls on a noise-sensitive land use within an area categorized as either “normally acceptable” or “conditionally acceptable” (see Table X for description of these categories); or cause ambient noise levels to increase by 3 dBA CNEL or more and the resulting noise falls on a noise-sensitive land use within an area categorized as either “normally acceptable” or “clearly unacceptable.”
- Project-related operational (i.e., non-roadway) noise sources such as outdoor activities, building mechanical/electrical equipment, etc., increase ambient noise level by 5 dBA, causing a violation of the City Noise Ordinance.
- The maximum noise level (Lmax) generated from the operation of the loading dock, refuse collection area, or parking structure.

Ground-Borne Vibration

The City of Los Angeles has not adopted a significance threshold to assess vibration impacts during construction. Thus, the Caltrans Transportation and Construction Vibration Guidance Manual is used as screening tools to assess the potential for adverse vibration effects related to structural damage and human perception.

- **Potential Building Damage.** Project construction activities cause ground-borne vibration levels to exceed 0.5-inch-per second PPV at the nearest off-site residential buildings
- **Potential Human Annoyance.** Project construction and operation activities cause ground-borne vibration levels to exceed 0.035-inch-per-second PPV at nearby residential uses.

METHODOLOGY

Ambient Noise Measurements

Noise-level monitoring was conducted by Meridian Consultants on July 31, 2018, at four (4) locations within the Project area vicinity, as shown in **Figure 4: Noise Monitoring Locations.** Noise-level monitoring was conducted for 15-minute intervals at each location using a Larson Davis Model 831 sound-level meter. This meter satisfies the American National Standards Institute (ANSI) standard for general environmental noise measurement instrumentation. The ANSI specifies several types of sound-level meters according to their precision. Types 1, 2, and 3 are referred to as “precision,” “general-purpose,” and “survey” meters, respectively. Most measurements carefully taken with a Type 1 sound-level meter will have a margin of error not exceeding 1 dB.

The Larson Davis Model 831 is a Type 1 precision sound-level meter. This meter meets all requirements of ANSI S1.4-1983 and ANSI1.43-1997 Type 1 standards, as well as International Electrotechnical Commission (IEC) IEC61672-1 Ed. 1.0, IEC60651 Ed 1.2, and IEC60804 Type 1, Group X standards.

The sound-level meter was located approximately 5 feet above ground and was covered with a Larson Davis windscreen. The sound-level meter was field calibrated with an external calibrator prior to operation.

Construction Scenario

Construction details are currently in preliminary stages. As such, conservative construction assumptions were assumed. Project construction is estimated to last approximately 23 months. Construction would occur over six phases: (1) demolition; (2) site preparation; (3) grading; (4) building construction; (5) architectural coating; and (6) paving.

Each phase of construction would result in varying levels of intensity and a number of construction personnel. The construction workforce would consist of approximately 10 worker trips per day and 24 total hauling trips during demolition; 5 worker trips per day during site preparation; 10 worker trips per day and 2,312 total hauling trips during grading; 63 worker trips per day and 12 total vendor trips during building construction; 18 worker trips per day during paving; and 13 worker trips per day during architectural coating.

City of Los Angeles General Plan Noise Element

The City's General Plan Noise Element identifies sources of noise and provides objectives and policies to ensure that noise from various sources does not create an unacceptable noise environment. The following Noise Element policies and objectives are applicable to the Project:[4]

- Objective 2 (Nonairport) – reduce or eliminate nonairport related intrusive noise, especially relative to noise sensitive uses.
  - Policy 2.2 – Enforce and/or implement applicable city, state and federal regulations intended to mitigate proposed noise producing activities, reduce intrusive noise and alleviate noise that is deemed a public nuisance.
- Objective 3 (Land Use Development): reduce or eliminate noise impacts associated with proposed development of land and changes in land use.
  - Policy 3.1 – Develop land use policies and programs that will reduce or eliminate potential and existing noise impacts.

4 City of Los Angeles, *General Plan,* "Noise Element" (adopted February 3, 1999).

SOURCE: Google Earth - 2018

FIGURE **4**

Meridian Consultants

Noise Monitoring Locations

219-001-18

City of Los Angeles General Noise Ordinance

The Los Angeles Municipal Code (LAMC) indicates that in cases where the actual ambient conditions are not known, the City's presumed daytime (7:00 AM to 10:00 PM) and nighttime (10:00 PM to 7:00 AM) minimum ambient noise levels as defined in Section 111.02 of the LAMC should be used. The presumed ambient noise levels for these areas set forth in the LAMC Sections 111.02 and 112.05 are provided in **Table 2: City of Los Angeles Presumed Ambient Noise Levels.**

Table 2
City of Los Angeles Presumed Ambient Noise Levels

Zone	Daytime Hours (7:00 AM to 10:00 PM) dBA (Leq)	Nighttime Hours (10:00 PM to 7:00 AM) dBA (Leq)
Residential	50	40
Commercial	60	55
Manufacturing (M1, MR1, and MR2)	60	55
Heavy Manufacturing (M2 and M3)	65	65

Source: Los Angeles Municipal Code, sec. 111.03.

Section 41.40 of the LAMC regulates noise from demolition and construction activities. More specifically, Section 41.40 prohibits construction activity and repair work where the use of any power tool, device, or equipment would disturb persons occupying sleeping quarters in any dwelling hotel, apartment, or other place of residence between the hours of 9:00 PM to 7:00 AM Monday through Friday, and between 6:00 PM and 8:00 AM on Saturday. All such activities are prohibited on Sundays and all federal holidays.

Section 112.05 of the LAMC also specifies the maximum noise level of construction machinery that can be generated in any residential zone of the City or within 500 feet thereof. Specifically, any construction machinery may not generate a maximum noise level exceeding 75 dB(A) at 50 feet from the equipment. However, the above noise limitation does not apply where compliance is technically infeasible. LAMC Section 112.05 defines technical infeasibility to mean that "said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers and/or other noise reduction device or techniques during the operation of the equipment."

EXISTING CONDITIONS

Ambient Noise Levels

Short-term sound monitoring was conducted at four (4) locations to measure the ambient sound environment in the Project vicinity (see **Appendix A: Construction Noise Data Sheets**). Measurements

were taken over 15-minute intervals at each location between the hours of 6:59 AM and 8:17 AM on July 31, 2018, as indicated in **Table 3: Ambient Noise Measurements**. **Figure 4** depicts locations where ambient noise measurements were conducted. As shown in **Table 3,** ambient noise levels ranged from a low of 51.8 dBA east of the Project site (Site 3) to a high of 74.2 dBA west of the Project site (Site 3). Higher ambient noise levels were located northwest of the site due to increased truck activity next to the sound-level meter.

Table 3
Ambient Noise Measurements

Location Number/Description		Nearest Use	Time Period	Noise Source	dBA Leq
1	West of the Project site across W. Sunset Blvd	Multifamily residential	7:31 AM–7:46 AM	Pedestrian and heavy traffic along W. Sunset Blvd	74.2
2	Adjacent to the Project site along W. Sunset Blvd	Multi-family residential	6:59 AM–7:14 AM	Pedestrian and heavy traffic along W. Sunset Blvd	72.8
3	East of the Project site along Everett St.	Single- and Multi-family residential	7:50 AM–8:05 AM	Pedestrian and light traffic along Everett St.	51.8
4	North of the Project site along W. Sunset Blvd	Multi-family residential	7:15 AM–7:30 AM	Pedestrian and heavy traffic along W. Sunset Blvd	74.2

*Source: Refer to **Appendix A** for noise monitoring data sheets.*
Notes: dBA = A-weighted decibels; Leq = average equivalent sound level.

Vibration Conditions

Based on field observations, the primary source of existing ground-borne vibration in the vicinity of the Project site is vehicle traffic on local roadways. According to the FTA,[5] typical road traffic–induced vibration levels are unlikely to be perceptible by people. Trucks and buses typically generate ground-borne vibration velocity levels of approximately 63 VdB (at a 50-foot distance), and these levels could reach 72 VdB when trucks and buses pass over bumps in the road. A vibration level of 72 VdB is above the 60 VdB level of perceptibility.

5 Federal Transit Administration, *Transit Noise and Vibration Impact Assessment* (2004).

NOISE ANALYSIS

Construction

On-Site Construction Noise

Construction activities that would occur during the construction phases (demolition, site preparation, grading, building construction, architectural coating, and paving) would generate both steady-state and episodic noise that would be heard both on and off the Project site. Each phase involves the use of different types of construction equipment and, therefore, has its own distinct noise characteristics. Demolition would typically include equipment such as concrete saw, dozer, and tractors/loaders/backhoes; site preparation would typically include equipment such as grader and tractors/loaders/backhoes; grading and excavation would typically include equipment such as concrete saw, dozer, and tractors/loaders/backhoes; building construction would typically include equipment such as cranes, forklifts, and tractors/loaders/backhoes; architectural coating would typically include equipment such as air compressors; and paving would typically include equipment such as concrete mixers, pavers, rollers, and tractors/loaders/backhoes. The Project would be constructed using typical construction techniques; no blasting, impact pile driving, or jackhammers would be required.

Estimated noise levels associated with the Project could occur as close as 40 feet from the nearest residence to the southwest. Typical maximum noise levels and duty cycles of representative types of equipment that would potentially be used during construction for this Project are presented in **Table 4: Typical Maximum Noise Levels for Project Construction Equipment.** Construction equipment noise would not be constant because of the variations of power, cycles, and equipment locations. For maximum noise events, this analysis considers equipment operating at the edge of the property line of the Project site.

Table 4
Typical Maximum Noise Levels for Project Construction Equipment

Equipment Description	Noise Level at 50 feet (dBA)	Typical Duty Cycle (%)
Compressor (air)	78	40
Concrete/Industrial saw	90	20
Crane	81	16
Dozer	82	40
Front end loader	79	40
Grader	85	40
Paver	77	50
Tractor	84	40

Source: US Department of Transportation, Federal Highway Administration, Construction Equipment and Noise Level Ranges.
Note: kVA = kilovolt-ampere.

As mentioned previously, sound generated by the construction noise source typically diminishes at a rate of 6 dBA over hard surfaces, such as asphalt, and 7.5 dBA over soft surfaces, such as vegetation, for each doubling of distance. Barriers—such as walls, berms, or buildings, and elevation differences—can also reduce sound levels by up to 20 dBA.[6]

The potential noise impact generated during construction depends on the phase of construction and the percentage of time the equipment operates over the workday. However, construction noise estimates used for the analysis are representative of worst-case conditions because it is unlikely that all the equipment contained on site would operate simultaneously. The Project would be constructed using typical construction techniques; no blasting, impact pile driving, or jackhammers would be required. As would be the case for construction of most land use development projects, construction of the proposed Project would require the use of heavy-duty equipment with the potential to generate audible noise above the ambient background noise level.

The noise levels at the various distances from construction activity are shown in **Table 5: Construction Noise Estimates.** Construction equipment operates at its nosiest levels for certain percentages of time during operation. Equipment such as excavators, graders, and loaders would operate at different percentages over the course of an hour.[7] During a construction day, the highest noise levels would be generated when multiple pieces of construction equipment are operated concurrently. The Project's

6 Caltrans, *Technical Noise Supplement* (1998), 33–40, 123–131.
7 Federal Highway Administration, *Traffic Noise Model* (2006).

estimated construction noise levels were calculated for a scenario in which a reasonable number of construction equipment was assumed to be operating simultaneously, given the physical size of the site and logistical limitations, and with the noise equipment located at the construction area nearest to the affected receptors to present a conservative impact analysis. This is considered a worst-case evaluation because the Project would typically use fewer overall equipment simultaneously at any given time and, as such, would likely generate lower noise levels than reported herein.

Table 5
Construction Noise Estimates

Site	Distance from Project Site (feet)	Estimated Construction Noise Levels by Phase						Ambient Noise Leq (dBA)	Maximum Noise Exceedance, Leq (dBA)[a]
		Demolition	Site Preparation	Grading	Building Construction	Paving	Architectural Coating		
1	125	79	76	79	77	81	68	74	+8
2[b]	--	--	--	--	--	--	--	--	--
3	175	76	73	76	74	78	65	52[c]	+26
4	115	80	76	80	78	82	69	74	+9

[a] Logarithmic increase.
[b] Located on the Project site.
[c] Measurement taken approximately 385 feet and 175 feet east of Sunset Boulevard and the Project boundary, respectively.
*Source: Refer to **Appendix B** for construction noise data spreadsheets.*

With implementation of the recommended **Mitigation Measure N-1,** construction activities would include the use of a sound curtain, which would result in a minimum of 15 dB reduction. For instance, a sound curtain with a sound transmission classification rating of 25 could reduce noise levels by 15 to 22 dB on both sides of the equipment where the curtain is installed.[8] Furthermore, standard exhaust mufflers for all equipment and the break in line of sight to a sensitive receptor would reduce construction noise levels by approximately 7 dB. The Project would comply with the City's Noise Ordinance as it relates to construction equipment by limiting activities to occur between 7:00 AM to 7:00 PM. Thus, with implementation of these recommended measures and compliance with the City's Noise Ordinance, construction noise levels would not be considered significant.

Off-Site Construction Noise

Construction the Project would require haul and vendor truck trips to and from the site to export soil and delivery supplies to the site. Trucks traveling to and from the Project site would be required to travel along a haul route approved by the City of Los Angeles. Approximately 2,312 total hauling trips would take place

8 Behrens and Associates Environmental Noise Control, "Temporary Compressor Sound Walls," http://www.drillingnoisecontrol.com/tempcompressor.html.

during grading, which total to approximately 2 to 3 haul truck trips per hour during a work day. Haul truck traffic would take the most direct route to the appropriate freeway ramp.

Noise associated with construction truck trips were estimated using the Caltrans FHWA Traffic Noise Model based on the maximum number of truck trips in a day. Project truck trips would generate noise levels of approximately 49 dBA, measured at a distance of 25 feet along W. Sunset Boulevard. As shown in **Table 3,** existing noise levels along W. Sunset Boulevard ranges from 72.8 dBA to 74.2 dBA. The noise level increases by truck trips would be below the significance threshold of 5 dBA.

Construction Vibration

Table 6: Construction Vibration Levels Estimates, lists the vibration source levels at varying distances of the assumed construction equipment to be used during construction. As shown in **Table 6**, cement and mortar mixers[9] are capable of producing approximately 0.016 ips PPV at 115 feet and would not generate vibration levels in excess of 0.5 ips PPV. As such, the single family residential units located to the east of the Project site with regard to construction vibration activities would not be affected as a result of attenuation of ground-borne vibration. Furthermore, construction activities would be restricted to daytime hours, when people are the least sensitive to vibration intrusions.

Table 6
Construction Vibration Levels Estimates

Equipment	Inches per Second PPV at Adjusted Distance		
	Site 1 (125 feet)	Site 3 (175 feet)	Site 4 (115 feet)
Air compressor	0.008	0.005	0.009
Cement and mortar mixer	0.014	0.009	0.016
Concrete saw	0.002	0.001	0.002
Crane	0.005	0.003	0.006
Dozer	0.006	0.004	0.007
Forklift	0.006	0.035	0.007
Grader	0.004	0.002	0.004
Paver	0.006	0.003	0.006
Tractor	0.006	0.004	0.007

Source: FHWA Roadway Construction Noise Model *(2006).*

9 Based on the CalEEMod default assumptions, four (4) cement and mortar mixers are expected to be used during the paving period. The analysis assumes a worst-case scenario, in which all four mixers are operated simultaneously.

Operation

Parking Structure Noise

Vehicle access to the structured parking on the Project site would be accommodated by an entrance driveway along W. Sunset Boulevard. Parking stalls would be located on the ground floor of the structure; they would be screened from public view and shielded from surrounding off-site development by the Project building itself. Automobile movements within parking structures represent the most continuous noise source and, in certain circumstances, can generate noise levels with the potential to adversely impact adjacent land uses. However, due to the low speeds of the vehicles in the garage, and because views of the parking levels would be visually screened (enclosed) by the Project building, blocking the line of sight between the noise source and sensitive receptors, parking-related noise would be shielded and would not increase the ambient noise levels at the nearest off-site sensitive receptor locations. As such, parking structure noise would not increase the exterior noise level above the City's thresholds of significance.

Refuse Collection Area Noise

The Project's refuse and recycling collection bins would be stored in a dedicated area of the proposed apartment building. In addition, collecting or disposing of rubbish or garbage would not occur between the hours of 9:00 PM and 6:00 AM of the following day to comply with LAMC Section 113.01. Therefore, operational refuse collection area noise would not increase exterior ambient noise levels.

Fixed Mechanical Equipment Noise

The Project would introduce various stationary noise sources including heating, ventilation, and air conditioning systems, which would be located either on the roof, the side of a structure, or on the ground. All Project mechanical equipment would be required to be designed with appropriate noise control devices, such as sound attenuators, acoustics louvers, or sound screens/parapet walls to comply with noise limitation requirements provided in LAMC Section 112.02, which prohibits the noise from such equipment from causing an increase in the ambient noise level of more than 5 dB. Therefore, operation of mechanical equipment on the Project building would not exceed the City's threshold of significance.

CUMULATIVE NOISE

For purposes of this analysis, development of the related projects will be considered to contribute to cumulative noise impacts. Noise by definition is a localized phenomenon and drastically reduces as distance from the source increases. As a result, only related projects and growth in the general area of the Project site would contribute to cumulative noise impacts. Cumulative construction noise impacts have the potential to occur when multiple construction projects in the local area generate noise within

the same time frame and contribute to the local ambient noise environment. It is expected that, as with the Project, the related projects would implement best management practices, which would minimize any noise-related nuisances during construction. Therefore, the combined construction noise impact of the related projects and the Project's contribution would not cause a significant cumulative impact.

With regard to stationary sources, cumulative significant noise impacts may result from cumulative development. Stationary sources of noise that could be introduced in the area by cumulative projects could include mechanical equipment, loading docks, and parking lots. Given that these projects would be required to adhere to the City's noise standards, all the stationary sources would be required to have shielding or other noise-abatement measures so as not to cause a substantial increase in ambient noise levels. Moreover, due to distance, it is unlikely that noise from multiple cumulative projects would interact to create a significant combined noise impact. As such, it is not anticipated that a significant cumulative increase in permanent ambient noise levels would occur.

RECOMMENDATIONS

The following recommended noise attenuation measure is provided to reduce noise impacts during construction activities.

N-1: For all construction-related activities, noise-attenuation techniques shall be employed as needed to ensure that noise remains as low as possible during construction. The following noise-attenuation techniques shall be incorporated into contract specifications to reduce the impact of construction noise:

- Ensure that construction equipment is properly muffled according to industry standards and in good working condition.
- Place noise-generating construction equipment and locate construction-staging areas away from sensitive uses, where feasible.
- Provide temporary, 15-foot-tall construction noise barriers (i.e., wood, sound blanket) between the Project construction site and off-site noise-sensitive uses adjacent to the Project site. The temporary noise barriers shall be used during early Project construction phases (up through building framing) when the use of heavy equipment is prevalent.
- Schedule high noise-producing activities between the hours of 7:00 AM and 5:00 PM to minimize disruption on sensitive uses.
- Implement noise-attenuation measures to the extent feasible, which may include but are not limited to temporary noise barriers or noise blankets around stationary construction noise sources.

- Use electric air compressors and similar power tools rather than diesel equipment, where feasible.
- Operate all stationary construction equipment (e.g., air compressors, generators, impact wrenches, etc.) as far away from residential uses as possible and shielded such equipment with temporary sound barriers, sound aprons, or sound skins.
- Turn off construction-related equipment—including heavy-duty equipment, motor vehicles, and portable equipment—when not in use for more than 5 minutes.
- Clearly post construction hours, allowable workdays, and the phone number of the job superintendent at all construction entrances to allow for surrounding owners to contact the job superintendent. If the City or the job superintendent receives a complaint, the superintendent shall investigate, take appropriate corrective action, and report the action taken to the reporting party.

APPENDIX A

Noise Monitoring Data Sheets

Monitoring Location: Site 1
Monitoring Date: 7/31/2018

Monitoring Period

Time	LAeq	LASmax	LASmin
7:31:48	75.2	78.4	58.4
7:32:48	75.8	79.2	65.2
7:33:48	74.8	78.4	61.6
7:34:48	73.6	77.9	57.1
7:35:48	75.4	78.1	69.6
7:36:48	75.6	79.7	68.2
7:37:48	76.1	80.4	67.7
7:38:48	73.2	78.4	55.6
7:39:48	74.1	79.1	66.4
7:40:48	76.8	81.8	71.2
7:41:48	72.7	79.8	57.5
7:42:48	72.0	80.3	61.9
7:43:48	71.1	75.5	65.7
7:44:48	72.3	77.7	65.7
7:45:48	72.2	81.6	65.5
7:46:48	70.1	72.5	67.6

15-minute LAeq **74.2**

Monitoring Location: Site 2
Monitoring Date: 7/31/2018

Monitoring Period

Time	LAeq	LASmax	LASmin
6:59:35	71.4	76.5	56.0
7:00:35	73.1	79.7	64.3
7:01:35	72.4	78.0	57.2
7:02:35	74.5	81.0	66.0
7:03:35	72.4	77.8	53.6
7:04:35	71.2	76.8	48.1
7:05:35	72.8	83.8	57.7
7:06:35	73.3	77.7	63.6
7:07:35	71.1	79.2	55.7
7:08:35	71.3	78.7	54.2
7:09:35	73.2	78.8	62.2
7:10:35	73.1	83.5	61.8
7:11:35	71.8	78.3	57.5
7:12:35	72.4	79.3	66.0
7:13:35	77.0	90.4	57.3
7:14:35	65.8	68.7	59.9

15-minute LAeq **72.8**

Monitoring Location: Site 3
Monitoring Date: 7/31/2018

Monitoring Period

Time	LAeq	LASmax	LASmin
7:50:27	55.0	65.9	47.6
7:51:27	51.9	64.3	47.7
7:52:27	49.6	51.9	47.5
7:53:27	50.0	56.1	47.9
7:54:27	58.8	69.3	50.4
7:55:27	49.5	54.5	47.4
7:56:27	50.7	58.7	48.0
7:57:27	48.9	51.4	47.1
7:58:27	48.3	51.1	46.6
7:59:27	49.0	53.6	46.1
8:00:27	49.7	56.5	47.2
8:01:27	48.9	52.9	47.2
8:02:27	49.7	54.7	47.2
8:03:27	50.7	58.9	47.3
8:04:27	49.3	53.3	47.5
8:05:27	49.4	53.8	47.4

15-minute LAeq **51.8**

Monitoring Location: Site 4
Monitoring Date: 7/31/2018

Monitoring Period

Time	LAeq	LASmax	LASmin
7:15:36	72.7	77.8	61.2
7:16:36	74.1	83.9	63.0
7:17:36	73.0	77.7	68.4
7:18:36	74.7	81.9	68.9
7:19:36	72.1	74.3	68.0
7:20:36	74.8	79.3	68.4
7:21:36	73.4	79.0	53.5
7:22:36	73.5	77.5	63.2
7:23:36	73.3	78.7	68.5
7:24:36	75.4	79.4	66.9
7:25:36	74.9	80.0	59.7
7:26:36	74.2	77.5	68.6
7:27:36	75.5	82.3	59.9
7:28:36	75.0	78.8	68.7
7:29:36	75.4	81.1	63.9
7:30:36	73.7	75.3	71.4

15-minute LAeq **74.2**

APPENDIX B

Construction Noise Data Spreadsheets

Project Title: 1251 W. Sunset

Site: Site 1

Parameters

Construction Hours:

11	Daytime hours (7:00 AM to 7:00 PM)
0	Evening hours (7:00 PM to 10:00 PM)
0	Nighttime hours (10:00 PM to 7:00 AM)

Calculation

Construction Phase / **Equipment Type**	**Number of Units**	**Acoustical Usage Factor**	**Actual Noise Level At 50 feet, Lmax**	**Distance Feet**	**Leq**	**Estimate Noise Shielding dBA**
Demolition					79	
Concrete Saw	1	0.2	90	125	75	0
Dozer	1	0.4	85	125	73	0
Tractor	2	0.4	84	125	75	0
Site Preparation					76	
Grader	1	0.4	85	125	73	0
Tractor	1	0.4	84	125	72	0
Grading/Excavation					79	
Concrete Saw	1	0.2	90	125	75	0
Dozer	1	0.4	85	125	73	0
Tractor	2	0.4	84	125	75	0
Building Construction					77	
Crane (mobile or stationary)	1	0.16	85	125	69	0
Front End Loader	2	0.4	80	125	71	0
Tractor	2	0.4	84	125	75	0
Paving					81	
Concrete Mixer	4	0.4	85	125	79	0
Paver	1	0.5	85	125	74	0
Front End Loader	1	0.4	80	125	68	0
Tractor	1	0.4	84	125	72	
Architectural Coating					68	
Compressor	1	0.4	80	125	68	0

Project Title: 1251 W. Sunset

Site: Site 3

Parameters

Construction Hours:

11	Daytime hours (7:00 AM to 7:00 PM)
0	Evening hours (7:00 PM to 10:00 PM)
0	Nighttime hours (10:00 PM to 7:00 AM)

Calculation

Construction Phase / **Equipment Type**	**Number of Units**	**Acoustical Usage Factor**	**Actual Noise Level At 50 feet, Lmax**	**Distance Feet**	**Leq**	**Estimate Noise Shielding dBA**
Demolition					76	
Concrete Saw	1	0.2	90	175	72	0
Dozer	1	0.4	85	175	70	0
Tractor	2	0.4	84	175	72	0
Site Preparation					73	
Grader	1	0.4	85	175	70	0
Tractor	1	0.4	84	175	69	0
Grading/Excavation					76	
Concrete Saw	1	0.2	90	175	72	0
Dozer	1	0.4	85	175	70	0
Tractor	2	0.4	84	175	72	0
Building Construction					74	
Crane (mobile or stationary)	1	0.16	85	175	66	0
Front End Loader	2	0.4	80	175	68	0
Tractor	2	0.4	84	175	72	0
Paving					78	
Concrete Mixer	4	0.4	85	175	76	0
Paver	1	0.5	85	175	71	0
Front End Loader	1	0.4	80	175	65	0
Tractor	1	0.4	84	175	69	
Architectural Coating					65	
Compressor	1	0.4	80	175	65	0

Project Title: 1251 W. Sunset

Site: Site 3

Parameters

Construction Hours:

11	Daytime hours (7:00 AM to 7:00 PM)
0	Evening hours (7:00 PM to 10:00 PM)
0	Nighttime hours (10:00 PM to 7:00 AM)

Calculation

Construction Phase / **Equipment Type**	**Number of Units**	**Acoustical Usage Factor**	**Actual Noise Level At 50 feet, Lmax**	**Distance Feet**	**Leq**	**Estimate Noise Shielding dBA**
Demolition					80	
Concrete Saw	1	0.2	90	115	76	0
Dozer	1	0.4	85	115	74	0
Tractor	2	0.4	84	115	76	0
Site Preparation					76	
Grader	1	0.4	85	115	74	0
Tractor	1	0.4	84	115	73	0
Grading/Excavation					80	
Concrete Saw	1	0.2	90	115	76	0
Dozer	1	0.4	85	115	74	0
Tractor	2	0.4	84	115	76	0
Building Construction					78	
Crane (mobile or stationary)	1	0.16	85	115	70	0
Front End Loader	2	0.4	80	115	72	0
Tractor	2	0.4	84	115	76	0
Paving					82	
Concrete Mixer	4	0.4	85	115	80	0
Paver	1	0.5	85	115	75	0
Front End Loader	1	0.4	80	115	69	0
Tractor	1	0.4	84	115	73	
Architectural Coating					69	
Compressor	1	0.4	80	115	69	0

Air Quality Study

for the

1251 W. Sunset Boulevard Apartment Project

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A CalEEMod Air Quality Emission Output Files

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EXECUTIVE SUMMARY

This Air Quality Study assesses and discusses the potential air quality impacts that may occur with the implementation of the 1251 W. Sunset Boulevard Apartment Project (Project), located in the City of Los Angeles. The analysis estimates future emission levels at surrounding land uses resulting from construction and operation of the Project and identifies the potential for significant impacts. An evaluation of the Project's contribution to potential cumulative air quality impacts is also provided. Air quality worksheets are provided in **Appendix A, CalEEMod Air Quality Emission Output Files.**

This report summarizes the potential for the Project to conflict with an applicable air quality plan, violate an air quality standard or threshold, result in a cumulatively net increase of criteria pollutant emissions, expose sensitive receptors to substantial pollutant concentrations, or create objectionable odors affecting a substantial number of people. The findings of the analyses are as follows:

- The Project would be consistent with air quality policies set forth by the South Coast Air Quality Management District (SCAQMD) and the Air Quality Management Plan.
- Construction and operational emissions would not contribute to short- or long-term emissions that would increase the carcinogenic effects on sensitive receptors. Emissions associated with operation would not exceed the SCAQMD-recommended thresholds. Thus, the Project would not result in a regional violation of applicable air quality standards or jeopardize the timely attainment of such standards in the South Coast Air Basin.
- Operation of the Project will not employ toxic air contaminant–emitting processes. No substantial pollutant concentration would be generated.
- Project construction and operations would not result in significant levels of odors.
- The Project would result in less than significant cumulative air quality impacts during construction and operation of the Project.

INTRODUCTION

This Air Quality Technical Report was prepared to evaluate the potential impacts during construction and operation of the 1251 W. Sunset Boulevard Apartment Project in Los Angeles, California. The report provides a summary of the Project components; describes the existing regulatory framework for air pollutants; discusses the environmental setting of the Project; and assesses the potential environmental impacts pertaining to air quality that may result from Project implementation. Determination of significance for Project impacts is based on analysis in accordance with the applicable regulatory thresholds.

PROJECT DESCRIPTION

The Project site is located at an occupied 0.46-acre of lot at 1251 W. Sunset Boulevard (Project site), in the City of Los Angeles (City), north of Marion Avenue and south of Innes Avenue, as shown in **Figure 1: Regional and Local Vicinity Map**. The Project site currently consists of a total of 10 multifamily residential units, (Assessor Parcel Number 5406-016-026 and 5406-015-001) totaling 5,280 square feet. The proposed Project consists of the demolition of existing uses and the construction of a 75-unit multifamily residential building, including 7,530 square feet of open space and a 37-space parking garage. The proposed Project would also include 75 long-term and 8 short-term bicycle parking spaces. Construction of the Project is expected to begin in March 2019 and is anticipated to be completed by early 2021.

REGULATORY SETTING

Ambient air quality emissions present complex environmental issues that require regulatory attention on both large and small scales. The cumulative nature of project-level and localized emissions contributing to greater regional conditions warrants that regulatory policies be instituted on national, state, and regional levels to address the air quality concerns. The following sections outline the applicable regulatory framework that exists at the national, state, and regional levels for air quality.

Background

The United States Environmental Protection Agency (USEPA) is responsible for federal oversight and enforcement of air quality management policies under the 1970 Clean Air Act (CAA). Each individual state is tasked with preparing and adhering to State Implementation Plans[1] (SIPs) for achieving the goals set forth within the CAA. California has some of the most stringent air quality policies in the country and, through the California Air Resources Board (CARB) branch of the California Environmental Protection Agency (CalEPA), has developed its own ambient air quality standards (AAQS).

1 A State Implementation Plan is a document prepared by each state describing existing air quality conditions and measures that will be followed to attain and maintain National Ambient Air Quality Standards.

SOURCE: Google Earth - 2018

FIGURE **1**

Meridian Consultants

Regional and Local Vicinity Map

219-001-18

The state is divided into air quality jurisdictions; each jurisdiction is governed by a regional air district that oversees policy implementation, permitting of air pollution emission sources, and enforcement of regulatory requirements. Six criteria air pollutants (CAPs) are monitored at the federal, state, and regional levels. These CAPs were identified based on a consensus of decades of research that concluded that inhalation of each of the chemicals results in adverse health effects in humans. The six pollutants are identified below in **Table 1**: **Sources and Health Effects of Criteria Air Pollutants**, along with their common sources and primary health effects from inhalation exposure.

Table 1
Sources and Health Effects of Criteria Air Pollutants

Pollutants	Sources	Primary Effects
Ozone (O3)	Formed when VOCs and NOx react in the presence of sunlight; VOC sources include any source that burns fuels (e.g., gasoline, natural gas, wood, oil), solvents, petroleum processing, and storage and pesticides	Breathing difficulties; lung tissue damage; damage to rubber and some plastics
Respirable particulate matter (PM10)	Road dust, windblown dust (agriculture) and construction (fireplaces); also formed from other pollutants (e.g., acid rain, NOx, oxides of sulfur [SOx], organics) and from incomplete combustion of any fuel	Increases respiratory disease, lung damage, cancer, premature death; reduced visibility; surface soiling
Fine particulate matter (PM2.5)	Fuel combustion in motor vehicles, equipment, and industrial sources; residential and agricultural burning; also formed from reaction of other pollutants (e.g., acid rain, NOx, SOx, organics)	Increases respiratory disease, lung damage, cancer, premature death; reduced visibility; surface soiling
Carbon monoxide (CO)	Any source that burns fuel, such as automobiles, trucks, heavy construction equipment, farming equipment, and residential heating	Chest pain in heart patients; headaches; reduced mental alertness
Nitrogen dioxide (NO2)	*See* carbon monoxide.	Lung irritation and damage
Lead (Pb)	Metal smelters, resource recovery, leaded gasoline, deterioration of lead paint	Learning disabilities; brain and kidney damage
Sulfur dioxide (SO2)	Coal- or oil-burning power plants and industries, refineries, diesel engines	Increases lung disease and breathing problems for asthmatics; reacts in the atmosphere to form acid rain

Source: California Air Resources Board, "ARB Fact Sheet: Air Pollution and Health" (2009), http://www.arb.ca.gov/research/health/fs/fs1/fs1.htm (accessed June 2015).

Ozone (O3)

Ozone (O3) is a gas formed when volatile organic compounds (VOCs) and oxides of nitrogen (NOx), both byproducts of internal combustion engine exhaust and other sources, undergo slow photochemical reactions in the presence of sunlight. Ozone concentrations are generally highest during the summer months, when direct sunlight, light wind, and warm temperature conditions are favorable to the formation of this pollutant.

Volatile Organic Compounds (VOC)

VOCs are compounds comprised primarily of atoms of hydrogen and carbon. Internal combustion associated with motor vehicle usage is the major source of hydrocarbons. Adverse effects on human health are not caused directly by VOCs, but rather by reactions of VOCs to form secondary air pollutants, including ozone. VOCs themselves are not criteria pollutants; however, they contribute to the formation of ozone and are regulated under state policies.

Respirable Particulate Matter (PM10)

Respirable particulate matter (PM10) consists of extremely small, suspended particles or droplets 10 micrometers (µm) or smaller in diameter. Some sources of PM10, like pollen and windstorms, are naturally occurring. However, in populated areas, most PM10 is caused by road dust, diesel soot, combustion products, the abrasion of tires and brakes, and construction activities.

Fine Particulate Matter (PM2.5)

PM2.5 refers to fine particulate matter that is 2.5 µm or smaller in size. Sources of PM2.5 include fuel combustion from automobiles, power plants, wood burning, industrial processes, and diesel-powered vehicles, such as buses and trucks. These fine particles are also formed in the atmosphere when gases, such as SO2, NOx, and VOCs are transformed in the air by chemical reactions.

Carbon Monoxide (CO)

Carbon monoxide (CO) is a colorless, odorless gas produced by the incomplete combustion of fuels. CO concentrations tend to be the highest during winter mornings with little to no wind, when surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines, unlike ozone, and because motor vehicles operating at slow speeds are the primary source of CO in the South Coast Air Basin (Basin), the highest ambient CO concentrations are generally found near congested transportation corridors and intersections.

Nitrogen Dioxide (NO2)

Nitrogen dioxide (NO2) is a reddish-brown, highly reactive gas that is formed in the ambient air through the oxidation of nitric oxide (NO). NO2 is also a byproduct of fuel combustion. The principle form of NO2 produced by combustion is NO, but NO reacts quickly to form NO2, creating the mixture of NO and NO2 referred to as oxides of nitrogen (NOx). NO2 acts as an acute irritant and, in equal concentrations, is more injurious than NO. At atmospheric concentrations, however, NOx is only potentially irritating. NO2 absorbs blue light, the result of which is a brownish-red cast to the atmosphere and reduced visibility.

Lead (Pb)

Lead (Pb) occurs in the atmosphere as particulate matter. The combustion of leaded gasoline is the primary source of airborne lead in the Basin. The use of leaded gasoline is no longer permitted for on-road motor vehicles, so most such combustion emissions are associated with off-road vehicles, such as race cars, that use leaded gasoline. Other sources of Pb include the manufacturing and recycling of batteries; sanding or removal of lead-based paint; ink; ceramics; ammunition; and secondary lead smelters.

Sulfur Dioxide (SO2)

Sulfur Dioxide (SO2) is a colorless, extremely irritating gas or liquid. It enters the atmosphere as a pollutant mainly as a result of the burning of high-sulfur-content fuel oils and coal, as well as from chemical processes occurring at chemical plants and refineries. When SO2 oxidizes in the atmosphere, it forms sulfates (SO4).

Federal

The USEPA sets national vehicle and stationary source emission standards; oversees approval of all SIPs; provides research and guidance for air pollution programs; and sets National Ambient Air Quality Standards (NAAQS). The NAAQS for the six CAPs (ozone, particulate matter PM10 and PM2.5, nitrogen dioxide, carbon monoxide, lead, and sulfur dioxide) are shown in **Table 2: Ambient Air Quality Standards** and were identified from provisions of the 1970 CAA. The sections of the CAA that are most applicable to the Project include Title I, Nonattainment Provisions, and Title II, Mobile Source Provisions.

The CAA and the promulgated standards have evolved as a living document over time as research into the effects of air pollution has enhanced regulatory understanding of the associated issues. The 1990 amendments to the CAA identify specific emission reduction goals for areas not meeting the NAAQS. These amendments require both a demonstration of reasonable further progress toward attainment and incorporation of additional sanctions for failure to attain or to meet interim milestones. On the national level, the USEPA designates regions as achieving “attainment” or suffering from “nonattainment” of the

NAAQS based on air quality monitoring data. Regions that are designated as being in nonattainment are responsible for devising localized strategies for reducing emissions of CAPs and achieving regional attainment within a predetermined timeframe set by the USEPA.

The NAAQS were further amended in July 1997 to include an 8-hour standard for ozone and to adopt an NAAQS for PM2.5. The NAAQS were amended again in September 2006 to include an established methodology for calculating PM2.5, as well as to revoke the annual PM10 threshold. Additional revisions to the AAQS may be implemented in the future as the science of air quality progresses.

Table 2
Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards		Federal Standards		
		Concentration	Method	Primary	Secondary	Method
Ozone (O3)	1 hour	0.09 ppm (180 µg/m^3)	Ultraviolet photometry	—	Same as primary standard	Ultraviolet photometry
	8 hours	0.07 ppm (137 µg/m^3)		0.075 ppm (147 µg/m^3)		
Respirable particulate matter (PM10)	24 hours	50 µg/m^3	Gravimetric or beta attenuation	150 µg/m^3	Same as primary standard	Inertial separation and gravimetric analysis
	Annual arithmetic mean	20 µg/m^3		—		
Fine particulate matter (PM2.5)	24 hours	No separate State standard		35 µg/m^3	Same as primary standard	Inertial separation and gravimetric analysis
	Annual arithmetic mean	12 µg/m^3	Gravimetric or beta attenuation	15 µg/m^3		
Carbon monoxide (CO)	8 hours	9.0 ppm (10 mg/m^3)	Nondispersive infrared photometry (NDIR)	9 ppm (10 mg/m^3)	None	NDIR
	1 hour	20 ppm (23 mg/m^3)		35 ppm (40 mg/m^3)		
Nitrogen dioxide (NO2)	Annual arithmetic mean	0.03 ppm (57 µg/m^3)	Gas phase chemilumi-nescence	0.053 ppm (100 µg/m^3)	Same as primary standard	Gas phase chemilumi-nescence
	1 hour	0.18 ppm (339 µg/m^3)		0.100 ppm (188 µg/m^3)		

Source: California Air Resources Board website at: http://www.arb.ca.gov/research/aaqs/aaqs.htm (accessed June 2016).
Note: ppm = parts per million.

State

The California Clean Air Act, signed into law in 1988, requires all areas of the state to achieve and maintain the California Ambient Air Quality Standards (CAAQS) by the earliest practicable date. The CARB is responsible for the coordination and administration of both state and federal air pollution control programs within California. In this capacity, CARB conducts research, sets CAAQS, compiles emission inventories, develops suggested control measures, and provides oversight of local programs. CARB establishes emissions standards for motor vehicles sold in California, consumer products, and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions and the CAAQS currently in effect for each of the criteria pollutants, as well as other pollutants recognized by the state. The CAAQS are provided in **Table 2**; it should be noted that the CAAQS are generally more stringent than the NAAQS, reflecting California's diligent efforts toward reducing air pollution and improving air quality.

Regional

In California, jurisdiction over air quality management, enforcement, and planning divided into 35 geographic regions. Within each region, a local air district is responsible for oversight of air quality monitoring, modeling, permitting, and enforcement to ensure that regulatory violations are avoided wherever possible.

The Project site is located within the 6,700-square-mile Basin and is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The Basin includes the southern two-thirds of Los Angeles County, all of Orange County, and the western urbanized portions of Riverside and San Bernardino Counties.

South Coast Air Quality Management District

SCAQMD shares responsibility with CARB for ensuring that all state and federal ambient air quality standards are achieved and maintained over an area of approximately 10,743 square miles. This area includes the South Coast and Salton Sea Air Basins, all of Orange County, and the nondesert portions of Los Angeles, Riverside, and San Bernardino Counties. It does not include the Antelope Valley or the nondesert portion of western San Bernardino County.

SCAQMD is responsible for controlling emissions, primarily from stationary sources. SCAQMD maintains air quality monitoring stations throughout the air basins. SCAQMD, in coordination with the Southern California Association of Governments (SCAG), is also responsible for developing, updating, and implementing the Air Quality Management Plan (AQMP) for the air basins. An AQMP is a plan prepared and implemented by an air pollution district for a county or region designated as being in nonattainment

of the NAAQS or CAAQS. The term "nonattainment area" is used to refer to an air basin in which one or more AAQS are exceeded. SCAQMD also prepares the SIP for its jurisdiction and promulgates rules and regulations. The SIP includes strategies and tactics to be used to attain the federal ozone standards in the South Coast Air Basin. The SIP elements are taken from the most recent AQMP.

SCAQMD approved a Final 2016 AQMP on March 3, 2017.[2] The 2016 AQMP includes transportation control measures developed by SCAG from its *2016–2040 Regional Transportation Plan/Sustainable Communities Strategy,* as well as the integrated strategies and measures needed to meet the NAAQS. The 2016 AQMP demonstrates attainment of the 1-hour and 8-hour ozone NAAQS as well as the latest 24-hour and annual PM2.5 standards.

SCAQMD is responsible for limiting the amount of emissions that can be generated throughout the air basins by various stationary, area, and mobile sources. Specific rules and regulations have been adopted by the SCAQMD Governing Board, which limit the emissions that can be generated by various uses/activities and that identify specific pollution reduction measures, which must be implemented in association with various uses and activities. These rules not only regulate the emissions of the federal and state criteria pollutants but also TACs and acutely hazardous materials. The rules are also subject to ongoing refinement by SCAQMD.

Among the SCAQMD rules applicable to the Project are Rule 403 (Fugitive Dust) and Rule 1113 (Architectural Coatings). Rule 403 requires the use of stringent best available control measures (BACMs) to minimize PM10 emissions during grading and construction activities. Rule 403.1 requires that active operations within a Blowsand Zone stabilize new man-made deposits of bulk material and requires a fugitive dust control plan for construction projects. Rule 1113 limits the VOC content of coatings, with a VOC content limit for flat coatings of 50 grams per liter (g/L).[3] Additional details regarding these rules and other potentially applicable rules are presented as follows.

Rule 403 (Fugitive Dust). This rule requires fugitive dust sources to implement BACMs for all sources and prohibits all forms of visible particulate matter from crossing any property line. This may include application of water or chemical stabilizers to disturbed soils covering haul vehicles; restricting vehicle speeds on unpaved roads to 15 miles per hour (mph); sweeping loose dirt from paved site access roadways; cessation of construction activity when winds exceed 25 mph; and establishing a permanent ground cover on finished sites. SCAQMD Rule 403 is intended to reduce PM10 emissions from any

2 South Coast Air Quality Management District (SCAQMD), "Final 2016 Air Quality Management Plan" (2016), http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp.

3 SCAQMD, "Rule 1113 Architectural Coating" (amended September 6, 2013), http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf, accessed July 2018.

transportation, handling, construction, or storage activity that has the potential to generate fugitive dust (see also Rule 1186).

Rule 1113 (Architectural Coatings). This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories.

Rule 1146.2 (Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters). This rule requires manufacturers, distributors, retailers, refurbishers, installers, and operators of new and existing units to reduce NOx emissions from natural gas-fired water heaters, boilers, and process heaters as defined in this rule.

Rule 1186 (PM10 Emissions from Paved and Unpaved Roads, and Livestock Operations). This rule applies to owners and operators of paved and unpaved roads and livestock operations. The rule is intended to reduce PM10 emissions by requiring the cleanup of material deposited onto paved roads, use of certified street sweeping equipment, and treatment of high-use unpaved roads (see also Rule 403).

Stationary emissions sources subject to these rules are regulated through SCAQMD's permitting process. Through this permitting process, SCAQMD also monitors the amount of stationary emissions being generated and uses this information in developing AQMPs.

ENVIRONMENTAL SETTING

Regional Air Quality

The USEPA is the federal agency responsible for overseeing the country's air quality and setting the NAAQS for the CAPs. The NAAQS were devised based on extensive modeling and monitoring of air pollution across the country; they are designed to protect public health and prevent the formation of atmospheric ozone. Air quality of a region is considered to be in attainment of the NAAQS if the measured ambient air pollutant levels do not exceed the applicable concentration threshold. **Table 2** above presents the federal and state ambient air quality standards.

As noted previously, the CARB is the state agency responsible for setting the CAAQS. Air quality of a region is considered to be in attainment of the CAAQS if the measured ambient air pollutant levels for ozone, CO, NO2, SO2, PM10, PM2.5, and lead are not exceeded, and all other standards are not equaled or exceeded at any time in any consecutive 3-year period. The CAAQS are also presented in **Table 2**.

For evaluation purposes, the SCAQMD territory is divided into 38 source receptor areas (SRAs). These SRAs are designated to provide a general representation of the local meteorological, terrain, and air quality conditions within the particular geographical area.

The Project site is within SRA 1, Central Los Angeles.[4] The nearest air monitoring station SCAQMD operates is located at 1630 North Main Street, Los Angeles.[5] This station monitors ozone, NO2, PM10, and PM2.5. **Table 3**: **Air Quality Monitoring Summary**, summarizes published monitoring data from 2014 through 2016, the most recent 3-year period available. The data shows that during the past few years, the region has exceeded the ozone and PM2.5 standards.

The USEPA and the CARB designate air basins where ambient air quality standards are exceeded as "nonattainment" areas. If standards are met, the area is designated as an "attainment" area. If there is inadequate or inconclusive data to make a definitive attainment designation, they are considered "unclassified." Federal nonattainment areas are further designated as marginal, moderate, serious, severe, or extreme as a function of deviation from standards.

The current attainment designations for the Basin are shown in **Table 4: South Coast Air Basin Attainment Status**. The Basin is currently designated as nonattainment at the federal level for ozone and PM2.5; and at the State level for ozone, PM10, and PM2.5.

Table 3
Air Quality Monitoring Summary

Air Pollutant	Average Time (Units)	2014	2015	2016
Ozone (O3)	State Max 1 hour (ppm)	0.113	0.104	0.103
	Days > CAAQS threshold (0.09 ppm)	3	2	2
	National Max 8 hour (ppm)	0.094	0.074	0.078
	Days > NAAQS threshold (0.075 ppm)	6	6	4
	State Max 8 hour (ppm)	0.095	0.074	0.078
	Days > CAAQS threshold (0.07 ppm)	7	6	4
Carbon monoxide (CO)*		—	—	—
Nitrogen dioxide (NO2)	National Max 1 hour (ppm)	0.082	0.079	0.064
	Days > NAAQS threshold (0.100 ppm)	0	0	0
	State Max 1 hour (ppm)	0.082	0.079	0.064
	Days > CAAQS threshold (0.18 ppm)	0	0	0

4 SCAQMD, *General Forecast Areas and Air Monitoring Areas,* map, http://www.aqmd.gov/docs/default-source/default-document-library/map-of-monitoring-areas.pdf, accessed July 2018.

5 South Coast Air Quality Management District, *Site Survey Report for (Central)-North Main Street Los Angeles,* map, AQS ID 060371103 (May 2015).

Air Pollutant	Average Time (Units)	2014	2015	2016
Respirable particulate matter (PM10)	National Max (µg/m3)	66.0	73.0	64.0
	National Annual Average (µg/m3)	30.6	27.1	25.8
	Days > NAAQS threshold (150 µg/m3)	0	0	0
	State Max (µg/m3)	86.8	88.5	74.6
	State Annual Average (µg/m3)	30.2	27.0	—
	Days > CAAQS threshold (50 µg/m3)	38	30	21
Fine particulate matter (PM2.5)	National Max (µg/m3)	59.9	56.4	44.3
	National Annual Average (µg/m3)	—	12.3	11.7
	Days > NAAQS threshold (35 µg/m3)	6	7	2
	State Max (µg/m3)	65.0	70.3	49.4
	State Annual Average (µg/m3)	—	12.5	12.0

Source: CARB, iADAM: Air Quality Data Statistics.
Notes: > = exceed; CAAQS = California Ambient Air Quality Standard; max = maximum; mean = annual arithmetic mean; µg/m3 = micrograms per cubic meter; ND = no data; NAAQS = National Ambient Air Quality Standard; ppm = parts per million.
(—) = Data not available.

Table 4
South Coast Air Basin Attainment Status

Pollutant	State Status	National Status
Ozone (O3)	Nonattainment	Nonattainment
Carbon monoxide (CO)	Attainment	Unclassified/Attainment
Nitrogen dioxide (NO2)	Attainment	Unclassified/Attainment
Sulfur dioxide (SO2)	Attainment	Attainment
Respirable particulate matter (PM10)	Nonattainment	Attainment
Fine particulate matter (PM2.5)	Nonattainment	Nonattainment

Source: California Air Resources Board (CARB) Area Designation Maps / State and National, http://www.arb.ca.gov/desig/adm/adm.htm, last reviewed May 5, 2016.

Existing Operational Emissions

The Project site is currently developed with multifamily residential uses. The current site usage generates existing vehicle trips and air quality emissions from operations related to multifamily residential uses at the site. **Table 5: Existing Operational Air Quality Emissions**, identifies the existing emissions from the existing uses. The most current CARB-approved, SCAQMD-recommended air quality modeling software, California Emissions Estimator Model (CalEEMod), was used to estimate existing air quality operational emissions.

Table 5
Existing Operational Air Quality Emissions

Source	VOC	NOx	CO	SOx	PM10	PM2.5
	pounds/day					
Maximum	<1	1	3	<1	1	<1

Note: *Totals may not add up exactly due to rounding in the modeling calculations.*
Source: *Refer to the data sheets in **Appendix A.1 (Existing Summer)** and **Appendix A.2 (Existing Winter)**.*

Sensitive Receptors

The SCAQMD considers a sensitive receptor to be a person in the population who is particularly susceptible to health effects due to exposure to an air contaminant. Sensitive receptors are identified near sources of air pollution to determine the potential for health hazards. Locations evaluated for exposure to air pollution include but are not limited to residences, schools, hospitals, and convalescent facilities.

Residential neighborhoods lie directly to the north, east, and west. **Figure 2: Sensitive Receptor Locations,** provides a detailed image of the proximal land uses and identifies the sensitive receptor locations closest to the Project site. These uses represent the nearest sensitive receptors that may be impacted by emissions of air pollutants from Project implementation.

SOURCE: Google Earth - 2018

FIGURE **2**

Meridian Consultants

Sensitive-Receptor Locations

219-001-18

METHODOLOGY

Construction

Construction of the Project has the potential to generate temporary criteria pollutant emissions through the use of heavy-duty construction equipment, such as excavators and forklifts, and through vehicle trips generated from workers and haul trucks traveling to and from the Project site. In addition, fugitive dust emissions would result from demolition and various soil-handling activities. Mobile-source emissions, primarily NOx, would result from the use of construction equipment, such as dozers and loaders. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of construction activity, and prevailing weather conditions. The assessment of construction air quality impacts considers each of these potential sources.

Daily regional emissions during construction are forecasted by assuming a conservative estimate of construction activities (i.e., assuming all construction occurs at the earliest feasible date) and applying the mobile source and fugitive dust emissions factors. The emissions are estimated using the CalEEMod (Version 2016.3.2) software, an emissions inventory software program recommended by the SCAQMD. CalEEMod is based on outputs from the CARB off-road emissions model (OFFROAD) and the CARB on-road vehicle emissions model (EMFAC), which are emissions estimation models developed by CARB and used to calculate emissions from construction activities, including on- and off-road vehicles. The input values used in this analysis are based on conservative assumptions in CalEEMod, with appropriate, Project-specific adjustments based on equipment types and expected construction activities. These values were then applied to the construction phasing assumptions used in the criteria pollutant analysis to generate criteria pollutant emissions values for each construction activity. Detailed construction equipment lists, construction scheduling, and emissions calculations are provided in **Appendix A**.

Operation

Operation of the Project has the potential to generate criteria pollutant emissions through vehicle trips traveling to and from the Project site. In addition, emissions would result from area sources on site, such as natural gas combustion, landscaping equipment, and use of consumer products.

Operational emissions were estimated using the CalEEMod software, which was used to forecast the daily regional emissions from area sources that would occur during long-term Project operations. In calculating mobile-source emissions, the trip length values were based on the distances provided in CalEEMod.

Area-source emissions are based on natural gas (building heating and water heaters), landscaping equipment, and consumer product usage (including paints) rates provided in CalEEMod. Natural gas usage factors in CalEEMod are based on the California Energy Commission (CEC) California Commercial End Use Survey (CEUS) data set, which provides energy demand by building type and climate zone.

Operational air quality impacts are assessed based on the incremental increase in emissions compared to baseline conditions. As discussed previously, the Project is currently developed with multifamily residential uses. Therefore, the analysis is based on the Project's net operational emissions by subtracting the existing site emissions from the Project emissions. The maximum daily net emissions from operation of the Project are compared to the SCAQMD daily regional numeric indicators.

SCAQMD AIR QUALITY SIGNIFICANCE THRESHOLDS

Significance Criteria

The *L.A. CEQA Thresholds Guide* states that the determination of a project's significance on air quality shall be made considering the factors provided in the SCAQMD *CEQA Air Quality Handbook* ("Handbook"). The City of Los Angeles has not adopted specific Citywide significance thresholds for air quality impacts; rather, the *L.A. CEQA Thresholds Guide* references the thresholds and methodologies contained in the SCAQMD Handbook evaluating projects in the City.[6]

The thresholds for determining the significance of impacts are set forth by the SCAQMD for both construction and operational emissions. These thresholds are described below.

Construction Emission Thresholds

The Project will have a significant impact if it exceeds the construction thresholds listed in **Table 6**: **Construction Thresholds**.

Table 6
Construction Thresholds

Pollutant	Construction Emissions (pounds/day)
Volatile organic compounds (VOCs)	75
Nitrogen dioxide (NO2)	100
Carbon monoxide (CO)	550
Sulfur dioxide (SO2)	150
Respirable particulate matter (PM10)	150
Fine particulate matter (PM2.5)	55

6 City of Los Angeles, *L.A. CEQA Thresholds Guide* (2006), B-1.

Construction and Operational Localized Significance Thresholds

The local significance thresholds are based on the SCAQMD's Localized Significance Threshold (LST) Methodology for CEQA Evaluations ("LST Methodology") for short duration construction activities. The SCAQMD recommends the evaluation of localized air quality impacts to sensitive receptors in the immediate vicinity of the Project site because of construction activities. The SCAQMD provides voluntary guidance on the evaluation of localized air quality impacts to public agencies conducting environmental review of projects located within its jurisdiction. Localized air quality impacts are evaluated by examining the on-site generation of pollutants and their resulting downwind concentrations. For construction, pollutant concentrations are compared to significance thresholds for particulates (PM10 and PM2.5), CO, and NO2. The significance threshold for PM10 represents compliance with SCAQMD Rule 403 (Fugitive Dust). The threshold for PM2.5 is designed to limit emissions and to allow progress toward attainment of the ambient air quality standard. Thresholds for CO and NO2 represent the allowable increase in concentrations above background levels that would not cause or contribute to an exceedance of their respective ambient air quality standards.

The LST Methodology guidance document provides look-up tables of emissions that are based on construction projects of up to 5 acres in size. These LST lookup tables were developed to assist lead agencies with a simple tool for evaluating the impacts from small typical projects. Ambient conditions for the Central Los Angeles area, as recorded in SRA 1 by the SCAQMD, were used for ambient conditions in determining appropriate threshold levels. Thresholds for each criteria pollutant for construction activity and project operation of the 0.46-acre Project site are listed in **Table 7: LST Thresholds**.

Table 7
LST Thresholds

	Construction	Operational
Pollutant	**pounds/day**	
Nitrogen dioxide (NO2)	56	56
Carbon monoxide (CO)	481	481
Respirable particulate matter (PM10)	3	2
Fine particulate matter (PM2.5)	2	<1

Notes:
Based on a distance to sensitive receptors of 25 meters (82 feet). The Localized Significance Threshold (LST) Methodology for CEQA Evaluations provides that projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters. LST values for 0.46-acre site.

Operational Thresholds

Based on the SCAQMD Handbook, thresholds for each criteria pollutant for the operations of the Project are provided in **Table 8: Operational Thresholds**.

Table 8
Operational Thresholds

Pollutant	Operational Emissions (pounds/day)
Volatile Organic Compounds (VOCs)	55
Nitrogen dioxide (NO2)	55
Carbon monoxide (CO)	550
Sulfur dioxide (SO2)	150
Respirable particulate matter (PM10)	150
Fine particulate matter (PM2.5)	55

Toxic Air Contaminants

As set forth in the *L.A. CEQA Thresholds Guide*, the determination of significance of a project with respect to toxic air contaminants shall be made on a case-by-case basis, considering the following factors:

- The regulatory framework for toxic materials and process involved;
- Proximity of toxic air contaminants to sensitive receptors;
- Quantity, volume, and toxicity of the contaminants expected to be emitted;
- Likelihood and potential level of exposure; and
- Degree to which project design will reduce risk of exposure.

Consistency with Applicable Air Quality Plans

Section 15125 of the State CEQA Guidelines requires an analysis of project consistency with applicable governmental plans and policies. In accordance with the SCAQMD Handbook, the following criteria were used to evaluate the Project's consistency with SCAQMD and SCAG regional plans and policies, including the AQMP:

- Will the Project result in any of the following:
  - Increase the frequency or severity of existing air quality violations?
  - Cause or contribute to new air quality violations?

  - Delay the timely attainment of the air quality standards or the interim emission reductions specified in the AQMP?
- Will the Project exceed the assumptions utilized in preparing the AQMP?
  - Is the Project consistent with the population and employment growth projections upon which AQMP forecasted emission levels are based?
  - Does the Project include air quality mitigation measures?
  - To what extent is Project development consistent with the AQMP land use policies?

Cumulative Threshold

SCAQMD recommends that a Project be considered to result in a cumulatively considerable impact to air quality if any construction-related emissions and operational emissions from individual development projects exceed the mass daily emissions thresholds for individual projects**.**[7]

The SCAQMD neither recommends quantified analyses of the emissions generated by a set of cumulative development projects nor provides thresholds of significance to be used to assess the impacts associated with these emissions.

A project is also considered to result in a cumulatively considerable contribution to significant impacts if the population and employment projections for the project exceed the rate of growth defined in SCAQMD's AQMP.

IMPACT ANALYSIS

Construction

Emissions of air pollutants were estimated for construction and operation of the Project. In California, the California Air Pollution Control Officer's Association recommends the use CalEEMod to calculate and organize emissions data for new development projects. CalEEMod is a program that relies on project-specific information pertaining to geographic setting, utility service provision, construction scheduling and equipment inventory, and operational design features to generate estimates of air pollutant and GHG emissions.

7 SCAQMD, *White Paper on Regulatory Options for Addressing Cumulative Impacts from Air Pollution Emissions*, board meeting, Agenda No. 29 (September 5, 2003), Appendix D, p. D-3.

Information needed to parameterize the Project in CalEEMod was obtained from the construction engineer and the Project architect. Construction of the Project is anticipated to begin on March 2019 and is expected to be completed by February 2021, when the Project will become operational.

Table 9: Project Construction Schedule, provides the dates and durations of each of the activities that will take place during construction, as well as a brief description of the scope of work. These dates represent approximations based on the general Project timeline and are subject to change pending unpredictable circumstances that may arise.

Table 9
Project Construction Schedule

Construction Activity	Start Date	End Date	Duration (Days)	Description
Demolition	3/4/2019	4/12/2019	30	Removal of 10 multifamily residential units
Site Preparation	4/13/2019	4/15/2019	1	Clearing and preparation for grading.
Grading	4/16/2019	09/30/2019	120	Export of 18,500 cubic yards of dirt
Building Construction	10/1/2019	2/22/2021	516	Construction of foundations and structures for 75-unit multifamily residential building, and 37-space parking garage.
Paving	1/22/2020	2/22/2021	44	Paving of asphalt surfaces.
Architectural Coating[a]	12/22/2020	2/22/2021	67	Application of architectural coatings to building materials

[a] Architectural coating will be taking place intermittently throughout building construction.
*Refer to **Appendix A.3 (Proposed Summer)** and **Appendix A.4 (Proposed Winter),** Section 3.0 Construction Detail.*

An assessment of air pollutant emissions was prepared utilizing the construction schedule in **Table 9**. It was assumed that all heavy-duty diesel equipment engines would meet minimum Tier 3 standards in accordance with CARB fleet requirements. **Table 10: Project Construction Diesel Equipment Inventory**, displays the construction equipment that would be required for each activity described in **Table 9**. It was assumed that all construction activities would adhere to the SCAQMD Rule 403 for Fugitive Dust and 1113 for Architectural Coatings.

Table 10
Project Construction Diesel Equipment Inventory

Phase	Off-Road Equipment Type	Amount	Daily Hours	Horsepower [HP] (Load Factor)
Demolition	Concrete/Industrial Saws	1	8	81 (0.73)
	Rubber Tired Dozers	1	1	247 (0.4)
	Tractors/Loaders/Backhoes	2	6	97 (0.37)
Site Preparation	Tractors/Loaders/Backhoes	1	8	97 (0.37)
	Graders	1	8	187 (0.41)
Grading	Concrete/Industrial Saws	1	8	81 (0.73)
	Rubber Tired Dozers	1	1	255 (0.40)
	Tractors/Loaders/Backhoes	2	6	97 (0.37)
Building Construction	Cranes	1	4	226 (0.29)
	Forklifts	2	6	89 (0.20)
	Tractors/Loaders/Backhoes	2	8	97 (0.37)
Paving	Cement and Mortar Mixers	4	6	9 (0.56)
	Pavers	1	7	130 (0.42)
	Rollers	1	7	80 (0.38)
	Tractors/Loaders/Backhoes	1	7	97 (0.37)
Architectural Coating	Air Compressors	1	6	78 (0.48)

*Refer to **Appendix A.3 (Proposed Summer)** and **Appendix A.4 (Proposed Winter),** Section 3.0 Construction Detail, for equipment inventory information.*

Maximum daily emissions of air pollutants during construction and operation of the Project were calculated using CalEEMod. **Table 11: Maximum Construction Emissions,** identifies daily emissions that are estimated for peak construction days for each construction year. Based on the modeling, construction of the Project would not exceed regional VOC, NOx, CO, SOx, PM10, and PM2.5 concentration thresholds. All criteria air pollutants would be below SCAQMD construction thresholds. Construction of the Project would not generate any significant environmental impacts associated with air quality compliance.

Table 11
Maximum Construction Emissions

Source	VOC	NOx	CO	SOx	PM10	PM2.5
	pounds/day					
Year 2019	1	18	11	<1	2	1
Year 2020	8	9	13	<1	1	1
Year 2021	9	14	20	<1	2	1
Maximum	9	18	20	<1	2	1
SCAQMD Mass Daily Threshold	75	100	550	150	150	55
Threshold exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod.
Notes:
Includes implementation of fugitive dust control measures required by SCAQMD under Rule 403 and 403.1, including watering disturbed areas a minimum of 3 times per day, replacing ground covers, and utilizing Tier 3 equipment.
CO = carbon monoxide; NOx = nitrogen oxides; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns; SOx = sulfur oxides; VOC = volatile organic compounds.
*Refer to **Appendix A.3 (Proposed Summer)** and **Appendix A.4 (Proposed Winter),** Sections 3.2 through 3.7, for maximum on-site plus off-site emissions during both the summer and winter seasons.*

Operation

The results presented in **Table 12: Maximum Operational Emissions,** are compared to the SCAQMD-established operational significance thresholds. Operational emissions will consist primarily from passenger vehicles traveling to and from the Project site. As shown in **Table 12**, the operational emissions would not exceed the regional VOC, NOx, CO, SOx, PM10, and PM2.5 concentration thresholds.

Table 12
Maximum Operational Emissions

Source	VOC	NOx	CO	SOx	PM10	PM 2.5
	pounds/day					
Area	1	1	7	<1	<1	<1
Energy	<1	<1	<1	<1	<1	<1
Mobile	1	4	12	<1	4	1
Total	2	6	19	<1	4	1
Existing	*(<1)*	*(1)*	*(3)*	*(<1)*	*(1)*	*(<1)*
Net Total	2	5	16	<1	3	1
SCAQMD Mass Daily Threshold	55	55	550	150	150	55
Threshold exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod.
Notes: Totals in table may not appear to add exactly due to rounding in the computer model calculations.
CO = carbon monoxide; NOx = nitrogen oxides; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns; SOx = sulfur oxides; VOC = volatile organic compounds.
*Refer to **Appendix A.3 (Proposed Summer)** and **Appendix A.4 (Proposed Winter),** Section 2.2, for maximum operational emissions during both the summer and winter seasons.*

Localized Significance Thresholds

The result of the LST analysis are provided in **Table 13: Localized Construction and Operational Emissions**. The estimated area of disturbance is approximately 1 acre for purposes of applying the SCAQMD mass rate emission threshold. These estimates assume the maximum area that would be disturbed during construction on any given day during Project buildout. Construction would comply with the SCAQMD's Fugitive Dust Rule 403, which requires watering of the site during dust-generating construction activities, stabilizing disturbed areas with water or chemical stabilizers, and preventing track-out dust from construction vehicles. As shown in **Table 13**, emissions would not exceed the localized significance construction and operational thresholds.

Table 13
Localized Construction and Operational Emissions

Source	NOx	CO	PM10	PM2.5
	On-Site Emissions (pounds/day)			
Construction				
Total maximum emissions	6	8	1	1
LST threshold	56	481	3	2
Threshold Exceeded?	**No**	**No**	**No**	**No**
Operational				
Project area/energy emissions	1	7	<1	<1
Existing Area/energy emissions	(<1)	(1)	(<1)	(<1)
Net total area/energy emissions	1	6	<1	<1
LST threshold	56	481	2	<1
Threshold Exceeded?	**No**	**No**	**No**	**No**

Notes:
Totals in table may not appear to add exactly due to rounding in the computer model calculations.
The net area/energy emissions of the Project represent the net difference between the existing operational uses that would be removed and the Project operational emissions.
CO = carbon monoxide; NOx = nitrogen oxide; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns.
1 LST for a 0.46-acre site.
*Refer to **Appendix A.3 (Proposed Summer)** and **Appendix A.4 (Proposed Winter),** Sections 3.2 through 3.7, for maximum on-site emissions during both the summer and winter seasons.*

Toxic Air Contaminants

Project construction would result in short-term emissions of diesel particulate matter, which is a TAC. Off-road heavy-duty diesel equipment would emit diesel particulate matter over the course of the construction period. Sensitive receptors are located adjacent to the Project, as shown in **Figure 2**. Localized diesel particulate emissions (strongly correlated with PM2.5 emissions) would be minimal and would be substantially below localized thresholds, as shown in **Table 13**. Project compliance with the CARB ATCM anti-idling measure, which limits idling to no more than 5 minutes at any location for diesel-fueled commercial vehicles, would further minimize diesel particulate matter emissions in the Project area.

Project operations would generate only minor amounts of diesel emissions from residential delivery trucks and incidental maintenance activities. Trucks would comply with the applicable provisions of the CARB Truck and Bus regulation to minimize and reduce emission from existing diesel trucks. In addition, Project operations would only result in minimal emissions of air toxics from maintenance or other ongoing activities, such as from the use of architectural coatings or household cleaning products. As a result, toxic

or carcinogenic air pollutants are not expected to occur in any meaningful amounts in conjunction with operation of the proposed residential uses within the Project site. Based on the uses expected on the Project site, potential long-term operational impacts associated with the release of TACs would be minimal and would not be expected to exceed the SCAQMD thresholds of significance.

Odors

As shown in **Table 13,** the construction of the Project would result in emissions below the localized significance thresholds. Mandatory compliance with SCAQMD Rule 1113 would limit the amount of VOCs in architectural coatings and solvents. According to the SCAQMD, while almost any source may emit objectionable odors, some land uses will be more likely to produce odors because of their operation. Land uses more likely to produce odors include agriculture, chemical plants, composting operations, dairies, fiberglass molding, landfills, refineries, rendering plants, rail yards, and wastewater treatment plants. The Project does not contain any active manufacturing activities and would not convert current agricultural land to residential land uses. Therefore, objectionable odors would not be emitted by the residential uses.

Any unforeseen odors generated by the Project will be controlled in accordance with SCAQMD Rule 402. Rule 402 prohibits the discharge of air contaminants that cause "injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property."[8] Failure to comply with Rule 402 could subject the offending facility to possible fines and/or operational limitations in an approved odor control or odor abatement plan.

Consistency with AQMP

The Basin is designated by the USEPA and State as being in nonattainment for ozone and PM2.5. SCAQMD developed regional emissions thresholds, as shown in **Table 6** and **Table 8**, to determine whether a project would contribute to air pollutant violations. If a project exceeds the regional air pollutant thresholds, then it would significantly contribute to air quality violations in the Basin.

As shown in **Table 11**, temporary emissions associated with construction of the Project would fall below SCAQMD thresholds for VOC, NOx, CO, SOx, PM10, and PM2.5.

As shown in **Table 12**, long-term emissions associated with operation of the Project would not exceed SCAQMD thresholds for VOC, NOx, CO, SOx, PM10, and PM2.5.

8 SCAQMD, "Rule 402—Nuisance," http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf.

The Project's maximum potential NOx, CO, PM10, and PM2.5 daily emissions during construction and operation were analyzed to determine potential effects on localized concentrations and to determine if there is a potential for such emissions to cause or affect a violation of an applicable ambient air quality standard. As shown in **Table 13**, NOx, CO, PM10, and PM2.5 emissions would not exceed the SCAQMD localized significance thresholds.

The Project is also located in an urban area that would reduce vehicle trips and vehicle miles traveled due to the urban infill characteristic and proximity to public transit stops. These measures and features are consistent with existing recommendations to reduce air emissions.

Cumulative

Development of the Project in conjunction with the related projects near the Project would result in an increase in construction and operational emissions in an already urbanized area of the City of Los Angeles. However, cumulative air quality impacts from construction, based on SCAQMD guidelines, are not analyzed in a manner similar to project-specific air quality impacts. Instead, the SCAQMD recommends that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project-specific impacts. According to the SCAQMD, individual development projects that generate construction or operational emissions that exceed the SCAQMD recommended daily regional or localized thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment.

With the implementation of regulatory compliance measures such as Rule 403 (Fugitive Dust) and Rule 1113 (Architectural Coating), the Project's construction and operational emissions are not expected to significantly contribute to cumulative emissions for CO, NOx, PM10, and PM10. As such, the Project's contribution to cumulative air quality emissions in combination with the related projects would not be cumulatively considerable.

As discussed previously, the Project would not jeopardize the attainment of air quality standards in the 2016 AQMP for the South Coast Air Basin and the Los Angeles County portion of the South Coast Air Basin. As such, the Project would not have a cumulatively considerable contribution to a potential conflict with or obstruction of the implementation of the AQMP regional reduction plans.

APPENDIX A

CalEEMod Air Quality Emission Output Files

Summer Existing

1251 W. Sunset (Existing)

Los Angeles-South Coast County, Summer

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Apartments Mid Rise	5.00	Dwelling Unit	0.13	2,640.00	14
Apartments Mid Rise	5.00	Dwelling Unit	0.13	2,640.00	14

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	33
Climate Zone	11			**Operational Year**	2018
Utility Company	Los Angeles Department of Water & Power				
CO2 Intensity (lb/MWhr)	1227.89	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics - Existing Conditions

Land Use - Assessor Parcel Map 5406-016-026 and 5406-015-001

Construction Phase - Existing Conditions

Woodstoves - No woodstoves

Energy Use -

Table Name	Column Name	Default Value	New Value
tblFireplaces	FireplaceWoodMass	1,019.20	0.00

tblFireplaces	NumberWood	0.50	0.00
tblLandUse	LandUseSquareFeet	5,000.00	2,640.00
tblLandUse	LandUseSquareFeet	5,000.00	2,640.00
tblWoodstoves	NumberCatalytic	0.50	0.00
tblWoodstoves	NumberNoncatalytic	0.50	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00

2.0 Emissions Summary

2.2 Overall Operational

Baseline Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	0.1722	0.2916	0.9509	1.8400e-003		0.0273	0.0273		0.0273	0.0273	0.0000	361.4855	361.4855	8.3700e-003	6.6000e-003	363.6616
Energy	2.7200e-003	0.0233	9.9000e-003	1.5000e-004		1.8800e-003	1.8800e-003		1.8800e-003	1.8800e-003		29.7081	29.7081	5.7000e-004	5.4000e-004	29.8847
Mobile	0.1688	0.7539	2.3311	6.5900e-003	0.4833	7.7500e-003	0.4910	0.1294	7.2900e-003	0.1367		668.1304	668.1304	0.0402		669.1364
Total	**0.3437**	**1.0688**	**3.2918**	**8.5800e-003**	**0.4833**	**0.0370**	**0.5203**	**0.1294**	**0.0365**	**0.1659**	**0.0000**	**1,059.3240**	**1,059.3240**	**0.0492**	**7.1400e-003**	**1,062.6827**

Regulatory Compliance Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e

Category	lb/day										lb/day					
Area	0.1722	0.2916	0.9509	1.8400e-003		0.0273	0.0273		0.0273	0.0273	0.0000	361.4855	361.4855	8.3700e-003	6.6000e-003	363.6616
Energy	2.7200e-003	0.0233	9.9000e-003	1.5000e-004		1.8800e-003	1.8800e-003		1.8800e-003	1.8800e-003		29.7081	29.7081	5.7000e-004	5.4000e-004	29.8847
Mobile	0.1688	0.7539	2.3311	6.5900e-003	0.4833	7.7500e-003	0.4910	0.1294	7.2900e-003	0.1367		668.1304	668.1304	0.0402		669.1364
Total	**0.3437**	**1.0688**	**3.2918**	**8.5800e-003**	**0.4833**	**0.0370**	**0.5203**	**0.1294**	**0.0365**	**0.1659**	**0.0000**	**1,059.3240**	**1,059.3240**	**0.0492**	**7.1400e-003**	**1,062.6827**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Regulatory Compliance	0.1688	0.7539	2.3311	6.5900e-003	0.4833	7.7500e-003	0.4910	0.1294	7.2900e-003	0.1367		668.1304	668.1304	0.0402		669.1364
Baseline	0.1688	0.7539	2.3311	6.5900e-003	0.4833	7.7500e-003	0.4910	0.1294	7.2900e-003	0.1367		668.1304	668.1304	0.0402		669.1364

4.2 Trip Summary Information

	Average Daily Trip Rate	Baseline	Regulatory Compliance

Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Mid Rise	33.25	31.95	29.30	111,057	111,057
Apartments Mid Rise	33.25	31.95	29.30	111,057	111,057
Total	66.50	63.90	58.60	222,115	222,115

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Mid Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
Apartments Mid Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Mid Rise	0.547972	0.046127	0.199330	0.125604	0.017697	0.005953	0.018360	0.027618	0.002341	0.002583	0.004804	0.000667	0.000944

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Regulatory Compliance	2.7200e-003	0.0233	9.9000e-003	1.5000e-004		1.8800e-003	1.8800e-003		1.8800e-003	1.8800e-003		29.7081	29.7081	5.7000e-004	5.4000e-004	29.8847
NaturalGas Baseline	2.7200e-003	0.0233	9.9000e-003	1.5000e-004		1.8800e-003	1.8800e-003		1.8800e-003	1.8800e-003		29.7081	29.7081	5.7000e-004	5.4000e-004	29.8847

5.2 Energy by Land Use - NaturalGas

Baseline

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Mid Rise	126.259	2.7200e-003	0.0233	9.9000e-003	1.5000e-004		1.8800e-003	1.8800e-003		1.8800e-003	1.8800e-003		29.7081	29.7081	5.7000e-004	5.4000e-004	29.8847
Total		**2.7200e-003**	**0.0233**	**9.9000e-003**	**1.5000e-004**		**1.8800e-003**	**1.8800e-003**		**1.8800e-003**	**1.8800e-003**		**29.7081**	**29.7081**	**5.7000e-004**	**5.4000e-004**	**29.8847**

Regulatory Compliance

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Mid Rise	0.126259	2.7200e-003	0.0233	9.9000e-003	1.5000e-004		1.8800e-003	1.8800e-003		1.8800e-003	1.8800e-003		29.7081	29.7081	5.7000e-004	5.4000e-004	29.8847
Total		**2.7200e-003**	**0.0233**	**9.9000e-003**	**1.5000e-004**		**1.8800e-003**	**1.8800e-003**		**1.8800e-003**	**1.8800e-003**		**29.7081**	**29.7081**	**5.7000e-004**	**5.4000e-004**	**29.8847**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Regulatory Compliance	0.1722	0.2916	0.9509	1.8400e-003		0.0273	0.0273		0.0273	0.0273	0.0000	361.4855	361.4855	8.3700e-003	6.6000e-003	363.6616
Baseline	0.1722	0.2916	0.9509	1.8400e-003		0.0273	0.0273		0.0273	0.0273	0.0000	361.4855	361.4855	8.3700e-003	6.6000e-003	363.6616

6.2 Area by SubCategory

Baseline

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	9.0500e-003					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.1045					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	0.0330	0.2820	0.1200	1.8000e-003		0.0228	0.0228		0.0228	0.0228	0.0000	360.0000	360.0000	6.9000e-003	6.6000e-003	362.1393
Landscaping	0.0256	9.6400e-003	0.8309	4.0000e-005		4.5300e-003	4.5300e-003		4.5300e-003	4.5300e-003		1.4855	1.4855	1.4700e-003		1.5223
Total	**0.1722**	**0.2916**	**0.9509**	**1.8400e-003**		**0.0273**	**0.0273**		**0.0273**	**0.0273**	**0.0000**	**361.4855**	**361.4855**	**8.3700e-003**	**6.6000e-003**	**363.6616**

Regulatory Compliance

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	9.0500e-003					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000

Consumer Products	0.1045					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	0.0330	0.2820	0.1200	1.8000e-003		0.0228	0.0228		0.0228	0.0228	0.0000	360.0000	360.0000	6.9000e-003	6.6000e-003	362.1393
Landscaping	0.0256	9.6400e-003	0.8309	4.0000e-005		4.5300e-003	4.5300e-003		4.5300e-003	4.5300e-003		1.4855	1.4855	1.4700e-003		1.5223
Total	**0.1722**	**0.2916**	**0.9509**	**1.8400e-003**		**0.0273**	**0.0273**		**0.0273**	**0.0273**	**0.0000**	**361.4855**	**361.4855**	**8.3700e-003**	**6.6000e-003**	**363.6616**

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

Winter Existing

1251 W. Sunset (Existing) - Los Angeles-South Coast County, Winter

1251 W. Sunset (Existing)

Los Angeles-South Coast County, Winter

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Apartments Mid Rise	5.00	Dwelling Unit	0.13	2,640.00	14
Apartments Mid Rise	5.00	Dwelling Unit	0.13	2,640.00	14

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	33
Climate Zone	11			**Operational Year**	2018
Utility Company	Los Angeles Department of Water & Power				
CO2 Intensity (lb/MWhr)	1227.89	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics - Existing Conditions

Land Use - Assessor Parcel Map 5406-016-026 and 5406-015-001

Construction Phase - Existing Conditions

Woodstoves - No woodstoves

Energy Use -

Table Name	Column Name	Default Value	New Value
tblFireplaces	FireplaceWoodMass	1,019.20	0.00

tblFireplaces	NumberWood	0.50	0.00
tblLandUse	LandUseSquareFeet	5,000.00	2,640.00
tblLandUse	LandUseSquareFeet	5,000.00	2,640.00
tblWoodstoves	NumberCatalytic	0.50	0.00
tblWoodstoves	NumberNoncatalytic	0.50	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00

2.0 Emissions Summary

2.2 Overall Operational

Baseline Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	0.1722	0.2916	0.9509	1.8400e-003		0.0273	0.0273		0.0273	0.0273	0.0000	361.4855	361.4855	8.3700e-003	6.6000e-003	363.6616
Energy	2.7200e-003	0.0233	9.9000e-003	1.5000e-004		1.8800e-003	1.8800e-003		1.8800e-003	1.8800e-003		29.7081	29.7081	5.7000e-004	5.4000e-004	29.8847
Mobile	0.1650	0.7783	2.2198	6.2600e-003	0.4833	7.8000e-003	0.4911	0.1294	7.3400e-003	0.1367		635.3743	635.3743	0.0399		636.3726
Total	**0.3399**	**1.0932**	**3.1805**	**8.2500e-003**	**0.4833**	**0.0370**	**0.5203**	**0.1294**	**0.0366**	**0.1659**	**0.0000**	**1,026.5679**	**1,026.5679**	**0.0489**	**7.1400e-003**	**1,029.9189**

Regulatory Compliance Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e

Category	lb/day										lb/day					
Area	0.1722	0.2916	0.9509	1.8400e-003		0.0273	0.0273		0.0273	0.0273	0.0000	361.4855	361.4855	8.3700e-003	6.6000e-003	363.6616
Energy	2.7200e-003	0.0233	9.9000e-003	1.5000e-004		1.8800e-003	1.8800e-003		1.8800e-003	1.8800e-003		29.7081	29.7081	5.7000e-004	5.4000e-004	29.8847
Mobile	0.1650	0.7783	2.2198	6.2600e-003	0.4833	7.8000e-003	0.4911	0.1294	7.3400e-003	0.1367		635.3743	635.3743	0.0399		636.3726
Total	**0.3399**	**1.0932**	**3.1805**	**8.2500e-003**	**0.4833**	**0.0370**	**0.5203**	**0.1294**	**0.0366**	**0.1659**	**0.0000**	**1,026.5679**	**1,026.5679**	**0.0489**	**7.1400e-003**	**1,029.9189**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Regulatory Compliance	0.1650	0.7783	2.2198	6.2600e-003	0.4833	7.8000e-003	0.4911	0.1294	7.3400e-003	0.1367		635.3743	635.3743	0.0399		636.3726
Baseline	0.1650	0.7783	2.2198	6.2600e-003	0.4833	7.8000e-003	0.4911	0.1294	7.3400e-003	0.1367		635.3743	635.3743	0.0399		636.3726

4.2 Trip Summary Information

	Average Daily Trip Rate	Baseline	Regulatory Compliance

Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Mid Rise	33.25	31.95	29.30	111,057	111,057
Apartments Mid Rise	33.25	31.95	29.30	111,057	111,057
Total	66.50	63.90	58.60	222,115	222,115

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Mid Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
Apartments Mid Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Mid Rise	0.547972	0.046127	0.199330	0.125604	0.017697	0.005953	0.018360	0.027618	0.002341	0.002583	0.004804	0.000667	0.000944

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Regulatory Compliance	2.7200e-003	0.0233	9.9000e-003	1.5000e-004		1.8800e-003	1.8800e-003		1.8800e-003	1.8800e-003		29.7081	29.7081	5.7000e-004	5.4000e-004	29.8847
NaturalGas Baseline	2.7200e-003	0.0233	9.9000e-003	1.5000e-004		1.8800e-003	1.8800e-003		1.8800e-003	1.8800e-003		29.7081	29.7081	5.7000e-004	5.4000e-004	29.8847

5.2 Energy by Land Use - NaturalGas

Baseline

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Mid Rise	126.259	2.7200e-003	0.0233	9.9000e-003	1.5000e-004		1.8800e-003	1.8800e-003		1.8800e-003	1.8800e-003		29.7081	29.7081	5.7000e-004	5.4000e-004	29.8847
Total		**2.7200e-003**	**0.0233**	**9.9000e-003**	**1.5000e-004**		**1.8800e-003**	**1.8800e-003**		**1.8800e-003**	**1.8800e-003**		**29.7081**	**29.7081**	**5.7000e-004**	**5.4000e-004**	**29.8847**

Regulatory Compliance

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Mid Rise	0.126259	2.7200e-003	0.0233	9.9000e-003	1.5000e-004		1.8800e-003	1.8800e-003		1.8800e-003	1.8800e-003		29.7081	29.7081	5.7000e-004	5.4000e-004	29.8847
Total		**2.7200e-003**	**0.0233**	**9.9000e-003**	**1.5000e-004**		**1.8800e-003**	**1.8800e-003**		**1.8800e-003**	**1.8800e-003**		**29.7081**	**29.7081**	**5.7000e-004**	**5.4000e-004**	**29.8847**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Regulatory Compliance	0.1722	0.2916	0.9509	1.8400e-003		0.0273	0.0273		0.0273	0.0273	0.0000	361.4855	361.4855	8.3700e-003	6.6000e-003	363.6616
Baseline	0.1722	0.2916	0.9509	1.8400e-003		0.0273	0.0273		0.0273	0.0273	0.0000	361.4855	361.4855	8.3700e-003	6.6000e-003	363.6616

6.2 Area by SubCategory

Baseline

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	9.0500e-003					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.1045					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	0.0330	0.2820	0.1200	1.8000e-003		0.0228	0.0228		0.0228	0.0228	0.0000	360.0000	360.0000	6.9000e-003	6.6000e-003	362.1393
Landscaping	0.0256	9.6400e-003	0.8309	4.0000e-005		4.5300e-003	4.5300e-003		4.5300e-003	4.5300e-003		1.4855	1.4855	1.4700e-003		1.5223
Total	**0.1722**	**0.2916**	**0.9509**	**1.8400e-003**		**0.0273**	**0.0273**		**0.0273**	**0.0273**	**0.0000**	**361.4855**	**361.4855**	**8.3700e-003**	**6.6000e-003**	**363.6616**

Regulatory Compliance

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	9.0500e-003					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000

Consumer Products	0.1045					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	0.0330	0.2820	0.1200	1.8000e-003		0.0228	0.0228		0.0228	0.0228	0.0000	360.0000	360.0000	6.9000e-003	6.6000e-003	362.1393
Landscaping	0.0256	9.6400e-003	0.8309	4.0000e-005		4.5300e-003	4.5300e-003		4.5300e-003	4.5300e-003		1.4855	1.4855	1.4700e-003		1.5223
Total	**0.1722**	**0.2916**	**0.9509**	**1.8400e-003**		**0.0273**	**0.0273**		**0.0273**	**0.0273**	**0.0000**	**361.4855**	**361.4855**	**8.3700e-003**	**6.6000e-003**	**363.6616**

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

1251 W. Sunset Blvd (Proposed)

Los Angeles-South Coast County, Summer

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Enclosed Parking with Elevator	37.00	Space	0.00	14,800.00	0
Other Asphalt Surfaces	7.53	1000sqft	0.00	7,530.00	0
Apartments Mid Rise	75.00	Dwelling Unit	0.46	54,558.85	215

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	33
Climate Zone	11			**Operational Year**	2022
Utility Company	Los Angeles Department of Water & Power				
CO2 Intensity (lb/MWhr)	1227.89	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - Project includes 75 units (Building A with two grade parking and B with one grade parking)

Construction Phase - Construction to start March 2019 and end early 2021

Trips and VMT - Assuming exported haul will be taken to Azusa Landfill

Demolition - Based on City of LA County Assessor Parcel Map
2640 + 2640
Grading - 18,500 cy of export

Woodstoves - No woodstoves

Construction Off-road Equipment Mitigation - Per CARB Title 13 CCR Section 2520-2427, equipment required to be Tier 4 Final for new equipment. SCAQMD recommends Tier 3 at the minimum.

Area Mitigation -

Water Mitigation -

Table Name	Column Name	Default Value	New Value
tblAreaMitigation	UseLowVOCPaintParkingCheck	False	True
tblConstDustMitigation	WaterUnpavedRoadVehicleSpeed	0	15
tblConstEquipMitigation	NumberOfEquipmentRegulatory Compliance	0.00	1.00
tblConstEquipMitigation	NumberOfEquipmentRegulatory Compliance	0.00	4.00
tblConstEquipMitigation	NumberOfEquipmentRegulatory Compliance	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentRegulatory Compliance	0.00	1.00
tblConstEquipMitigation	NumberOfEquipmentRegulatory Compliance	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentRegulatory Compliance	0.00	1.00
tblConstEquipMitigation	NumberOfEquipmentRegulatory Compliance	0.00	1.00
tblConstEquipMitigation	NumberOfEquipmentRegulatory Compliance	0.00	1.00
tblConstEquipMitigation	NumberOfEquipmentRegulatory Compliance	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentRegulatory Compliance	0.00	8.00
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstructionPhase	NumDays	5.00	45.00

tblConstructionPhase	NumDays	100.00	365.00
tblConstructionPhase	NumDays	10.00	30.00
tblConstructionPhase	NumDays	2.00	120.00
tblConstructionPhase	NumDays	5.00	22.00
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	NumberWood	3.75	0.00
tblGrading	AcresOfGrading	0.00	0.46
tblGrading	MaterialExported	0.00	18,500.00
tblLandUse	LandUseSquareFeet	75,000.00	54,558.85
tblLandUse	LotAcreage	0.33	0.00
tblLandUse	LotAcreage	0.17	0.00
tblLandUse	LotAcreage	1.97	0.46
tblTripsAndVMT	HaulingTripLength	20.00	50.00
tblTripsAndVMT	HaulingTripLength	20.00	50.00
tblTripsAndVMT	HaulingTripNumber	2,313.00	2,312.00
tblWoodstoves	NumberCatalytic	3.75	0.00
tblWoodstoves	NumberNoncatalytic	3.75	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Baseline Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2019	1.4010	20.5149	10.9493	0.0486	1.7276	0.6203	2.3179	0.6771	0.5710	1.2405	0.0000	5,112.3166	5,112.3166	0.4606	0.0000	5,123.8317

2020	9.2208	12.0614	12.8810	0.0265	0.9263	0.6464	1.5727	0.2474	0.6038	0.8512	0.0000	2,610.7015	2,610.7015	0.4270	0.0000	2,621.3761
2021	9.8791	17.6716	20.2617	0.0395	1.1275	0.9059	2.0334	0.3008	0.8445	1.1453	0.0000	3,820.3068	3,820.3068	0.7287	0.0000	3,838.5233
Maximum	**9.8791**	**20.5149**	**20.2617**	**0.0486**	**1.7276**	**0.9059**	**2.3179**	**0.6771**	**0.8445**	**1.2405**	**0.0000**	**5,112.3166**	**5,112.3166**	**0.7287**	**0.0000**	**5,123.8317**

Regulatory Compliance Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2019	0.7132	17.8754	11.3686	0.0486	1.2553	0.4550	1.7102	0.4228	0.4526	0.8755	0.0000	5,112.3166	5,112.3166	0.4606	0.0000	5,123.8317
2020	8.4556	9.0119	13.4569	0.0265	0.9263	0.4937	1.4200	0.2474	0.4929	0.7403	0.0000	2,610.7015	2,610.7015	0.4270	0.0000	2,621.3761
2021	8.7265	13.6865	20.7883	0.0395	1.1275	0.7822	1.9097	0.3008	0.7815	1.0822	0.0000	3,820.3068	3,820.3068	0.7287	0.0000	3,838.5233
Maximum	**8.7265**	**17.8754**	**20.7883**	**0.0486**	**1.2553**	**0.7822**	**1.9097**	**0.4228**	**0.7815**	**1.0822**	**0.0000**	**5,112.3166**	**5,112.3166**	**0.7287**	**0.0000**	**5,123.8317**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**12.71**	**19.25**	**-3.45**	**0.00**	**12.49**	**20.33**	**14.92**	**20.75**	**14.48**	**16.65**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

2.2 Overall Operational

Baseline Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	1.4947	1.1290	6.6488	7.0800e-003		0.1197	0.1197		0.1197	0.1197	0.0000	1,361.1512	1,361.1512	0.0367	0.0248	1,369.4429

Energy	0.0204	0.1745	0.0743	1.1100e-003		0.0141	0.0141		0.0141	0.0141		222.8108	222.8108	4.2700e-003	4.0800e-003	224.1349
Mobile	0.8994	4.3059	12.2487	0.0446	3.6241	0.0359	3.6600	0.9699	0.0335	1.0034		4,535.2229	4,535.2229	0.2267		4,540.8911
Total	**2.4145**	**5.6094**	**18.9718**	**0.0528**	**3.6241**	**0.1698**	**3.7939**	**0.9699**	**0.1674**	**1.1372**	**0.0000**	**6,119.1848**	**6,119.1848**	**0.2677**	**0.0288**	**6,134.4689**

Regulatory Compliance Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	1.4947	1.1290	6.6488	7.0800e-003		0.1197	0.1197		0.1197	0.1197	0.0000	1,361.1512	1,361.1512	0.0367	0.0248	1,369.4429
Energy	0.0204	0.1745	0.0743	1.1100e-003		0.0141	0.0141		0.0141	0.0141		222.8108	222.8108	4.2700e-003	4.0800e-003	224.1349
Mobile	0.8994	4.3059	12.2487	0.0446	3.6241	0.0359	3.6600	0.9699	0.0335	1.0034		4,535.2229	4,535.2229	0.2267		4,540.8911
Total	**2.4145**	**5.6094**	**18.9718**	**0.0528**	**3.6241**	**0.1698**	**3.7939**	**0.9699**	**0.1674**	**1.1372**	**0.0000**	**6,119.1848**	**6,119.1848**	**0.2677**	**0.0288**	**6,134.4689**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	3/4/2019	4/12/2019	5	30	
2	Site Preparation	Site Preparation	4/13/2019	4/15/2019	5	1	
3	Grading	Grading	4/16/2019	9/30/2019	5	120	
4	Building Construction	Building Construction	10/1/2019	2/22/2021	5	365	
5	Architectural Coating	Architectural Coating	12/22/2020	2/22/2021	5	45	

6	Paving	Paving	1/22/2021	2/22/2021	5	22	

Acres of Grading (Site Preparation Phase): 0.5

Acres of Grading (Grading Phase): 0.46

Acres of Paving: 0

Residential Indoor: 110,482; Residential Outdoor: 36,827; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area:

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Rubber Tired Dozers	1	1.00	247	0.40
Demolition	Tractors/Loaders/Backhoes	2	6.00	97	0.37
Site Preparation	Graders	1	8.00	187	0.41
Site Preparation	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Grading	Concrete/Industrial Saws	1	8.00	81	0.73
Grading	Rubber Tired Dozers	1	1.00	247	0.40
Grading	Tractors/Loaders/Backhoes	2	6.00	97	0.37
Building Construction	Cranes	1	4.00	231	0.29
Building Construction	Forklifts	2	6.00	89	0.20
Building Construction	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Paving	Cement and Mortar Mixers	4	6.00	9	0.56
Paving	Pavers	1	7.00	130	0.42
Paving	Rollers	1	7.00	80	0.38
Paving	Tractors/Loaders/Backhoes	1	7.00	97	0.37
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	4	10.00	0.00	24.00	14.70	6.90	50.00	LD_Mix	HDT_Mix	HHDT

Site Preparation	2	5.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	4	10.00	0.00	2,312.00	14.70	6.90	50.00	LD_Mix	HDT_Mix	HHDT
Building Construction	5	63.00	12.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	7	18.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	13.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Use Cleaner Engines for Construction Equipment

Water Exposed Area

Reduce Vehicle Speed on Unpaved Roads

3.2 Demolition - 2019

Baseline Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.1733	0.0000	0.1733	0.0262	0.0000	0.0262			0.0000			0.0000
Off-Road	0.9530	8.6039	7.6917	0.0120		0.5371	0.5371		0.5125	0.5125		1,159.6570	1,159.6570	0.2211		1,165.1847
Total	**0.9530**	**8.6039**	**7.6917**	**0.0120**	**0.1733**	**0.5371**	**0.7103**	**0.0262**	**0.5125**	**0.5387**		**1,159.6570**	**1,159.6570**	**0.2211**		**1,165.1847**

Baseline Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					

Hauling	0.0165	0.4931	0.1152	1.4700e-003	0.0349	2.1700e-003	0.0371	9.5800e-003	2.0800e-003	0.0117		159.0878	159.0878	9.7700e-003		159.3321
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0500	0.0367	0.4822	1.2200e-003	0.1118	9.6000e-004	0.1127	0.0296	8.9000e-004	0.0305		121.2953	121.2953	4.1700e-003		121.3995
Total	**0.0665**	**0.5298**	**0.5973**	**2.6900e-003**	**0.1467**	**3.1300e-003**	**0.1499**	**0.0392**	**2.9700e-003**	**0.0422**		**280.3831**	**280.3831**	**0.0139**		**280.7315**

Regulatory Compliance Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.0676	0.0000	0.0676	0.0102	0.0000	0.0102			0.0000			0.0000
Off-Road	0.2652	5.9644	7.9381	0.0120		0.4017	0.4017		0.4017	0.4017	0.0000	1,159.6570	1,159.6570	0.2211		1,165.1847
Total	**0.2652**	**5.9644**	**7.9381**	**0.0120**	**0.0676**	**0.4017**	**0.4693**	**0.0102**	**0.4017**	**0.4119**	**0.0000**	**1,159.6570**	**1,159.6570**	**0.2211**		**1,165.1847**

Regulatory Compliance Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0165	0.4931	0.1152	1.4700e-003	0.0349	2.1700e-003	0.0371	9.5800e-003	2.0800e-003	0.0117		159.0878	159.0878	9.7700e-003		159.3321
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0500	0.0367	0.4822	1.2200e-003	0.1118	9.6000e-004	0.1127	0.0296	8.9000e-004	0.0305		121.2953	121.2953	4.1700e-003		121.3995
Total	**0.0665**	**0.5298**	**0.5973**	**2.6900e-003**	**0.1467**	**3.1300e-003**	**0.1499**	**0.0392**	**2.9700e-003**	**0.0422**		**280.3831**	**280.3831**	**0.0139**		**280.7315**

3.3 Site Preparation - 2019

Baseline Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.5303	0.0000	0.5303	0.0573	0.0000	0.0573			0.0000			0.0000
Off-Road	0.7195	8.9170	4.1407	9.7500e-003		0.3672	0.3672		0.3378	0.3378		965.1690	965.1690	0.3054		972.8032
Total	**0.7195**	**8.9170**	**4.1407**	**9.7500e-003**	**0.5303**	**0.3672**	**0.8975**	**0.0573**	**0.3378**	**0.3951**		**965.1690**	**965.1690**	**0.3054**		**972.8032**

Baseline Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0250	0.0184	0.2411	6.1000e-004	0.0559	4.8000e-004	0.0564	0.0148	4.4000e-004	0.0153		60.6476	60.6476	2.0800e-003		60.6997
Total	**0.0250**	**0.0184**	**0.2411**	**6.1000e-004**	**0.0559**	**4.8000e-004**	**0.0564**	**0.0148**	**4.4000e-004**	**0.0153**		**60.6476**	**60.6476**	**2.0800e-003**		**60.6997**

Regulatory Compliance Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.2068	0.0000	0.2068	0.0223	0.0000	0.0223			0.0000			0.0000
Off-Road	0.2382	4.8716	5.8579	9.7500e-003		0.2405	0.2405		0.2405	0.2405	0.0000	965.1690	965.1690	0.3054		972.8032
Total	**0.2382**	**4.8716**	**5.8579**	**9.7500e-003**	**0.2068**	**0.2405**	**0.4473**	**0.0223**	**0.2405**	**0.2629**	**0.0000**	**965.1690**	**965.1690**	**0.3054**		**972.8032**

Regulatory Compliance Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0250	0.0184	0.2411	6.1000e-004	0.0559	4.8000e-004	0.0564	0.0148	4.4000e-004	0.0153		60.6476	60.6476	2.0800e-003		60.6997
Total	**0.0250**	**0.0184**	**0.2411**	**6.1000e-004**	**0.0559**	**4.8000e-004**	**0.0564**	**0.0148**	**4.4000e-004**	**0.0153**		**60.6476**	**60.6476**	**2.0800e-003**		**60.6997**

3.4 Grading - 2019

Baseline Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.7743	0.0000	0.7743	0.4169	0.0000	0.4169			0.0000			0.0000

Off-Road	0.9530	8.6039	7.6917	0.0120		0.5371	0.5371		0.5125	0.5125		1,159.6570	1,159.6570	0.2211		1,165.1847
Total	**0.9530**	**8.6039**	**7.6917**	**0.0120**	**0.7743**	**0.5371**	**1.3113**	**0.4169**	**0.5125**	**0.9293**		**1,159.6570**	**1,159.6570**	**0.2211**		**1,165.1847**

Baseline Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.3980	11.8743	2.7740	0.0354	0.8415	0.0523	0.8938	0.2306	0.0500	0.2807		3,831.3643	3,831.3643	0.2353		3,837.2476
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0500	0.0367	0.4822	1.2200e-003	0.1118	9.6000e-004	0.1127	0.0296	8.9000e-004	0.0305		121.2953	121.2953	4.1700e-003		121.3995
Total	**0.4479**	**11.9110**	**3.2562**	**0.0366**	**0.9533**	**0.0533**	**1.0066**	**0.2603**	**0.0509**	**0.3112**		**3,952.6596**	**3,952.6596**	**0.2395**		**3,958.6470**

Regulatory Compliance Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.3020	0.0000	0.3020	0.1626	0.0000	0.1626			0.0000			0.0000
Off-Road	0.2652	5.9644	7.9381	0.0120		0.4017	0.4017		0.4017	0.4017	0.0000	1,159.6570	1,159.6570	0.2211		1,165.1847
Total	**0.2652**	**5.9644**	**7.9381**	**0.0120**	**0.3020**	**0.4017**	**0.7037**	**0.1626**	**0.4017**	**0.5643**	**0.0000**	**1,159.6570**	**1,159.6570**	**0.2211**		**1,165.1847**

Regulatory Compliance Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.3980	11.8743	2.7740	0.0354	0.8415	0.0523	0.8938	0.2306	0.0500	0.2807		3,831.3643	3,831.3643	0.2353		3,837.2476
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0500	0.0367	0.4822	1.2200e-003	0.1118	9.6000e-004	0.1127	0.0296	8.9000e-004	0.0305		121.2953	121.2953	4.1700e-003		121.3995
Total	**0.4479**	**11.9110**	**3.2562**	**0.0366**	**0.9533**	**0.0533**	**1.0066**	**0.2603**	**0.0509**	**0.3112**		**3,952.6596**	**3,952.6596**	**0.2395**		**3,958.6470**

3.5 Building Construction - 2019

Baseline Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9576	9.8207	7.5432	0.0114		0.6054	0.6054		0.5569	0.5569		1,127.6696	1,127.6696	0.3568		1,136.5892
Total	**0.9576**	**9.8207**	**7.5432**	**0.0114**		**0.6054**	**0.6054**		**0.5569**	**0.5569**		**1,127.6696**	**1,127.6696**	**0.3568**		**1,136.5892**

Baseline Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					

Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0499	1.3888	0.3685	3.1400e-003	0.0768	8.8500e-003	0.0857	0.0221	8.4700e-003	0.0306		334.5775	334.5775	0.0214		335.1136
Worker	0.3147	0.2313	3.0376	7.6800e-003	0.7042	6.0700e-003	0.7103	0.1868	5.6000e-003	0.1924		764.1603	764.1603	0.0263		764.8165
Total	**0.3646**	**1.6201**	**3.4061**	**0.0108**	**0.7810**	**0.0149**	**0.7959**	**0.2089**	**0.0141**	**0.2229**		**1,098.7379**	**1,098.7379**	**0.0477**		**1,099.9301**

Regulatory Compliance Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.2793	6.1296	7.9624	0.0114		0.3855	0.3855		0.3855	0.3855	0.0000	1,127.6696	1,127.6696	0.3568		1,136.5892
Total	**0.2793**	**6.1296**	**7.9624**	**0.0114**		**0.3855**	**0.3855**		**0.3855**	**0.3855**	**0.0000**	**1,127.6696**	**1,127.6696**	**0.3568**		**1,136.5892**

Regulatory Compliance Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0499	1.3888	0.3685	3.1400e-003	0.0768	8.8500e-003	0.0857	0.0221	8.4700e-003	0.0306		334.5775	334.5775	0.0214		335.1136
Worker	0.3147	0.2313	3.0376	7.6800e-003	0.7042	6.0700e-003	0.7103	0.1868	5.6000e-003	0.1924		764.1603	764.1603	0.0263		764.8165
Total	**0.3646**	**1.6201**	**3.4061**	**0.0108**	**0.7810**	**0.0149**	**0.7959**	**0.2089**	**0.0141**	**0.2229**		**1,098.7379**	**1,098.7379**	**0.0477**		**1,099.9301**

3.5 Building Construction - 2020

Baseline Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.8617	8.8523	7.3875	0.0114		0.5224	0.5224		0.4806	0.4806		1,102.9781	1,102.9781	0.3567		1,111.8962
Total	**0.8617**	**8.8523**	**7.3875**	**0.0114**		**0.5224**	**0.5224**		**0.4806**	**0.4806**		**1,102.9781**	**1,102.9781**	**0.3567**		**1,111.8962**

Baseline Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0427	1.2765	0.3345	3.1100e-003	0.0768	6.0100e-003	0.0828	0.0221	5.7500e-003	0.0279		332.4296	332.4296	0.0203		332.9368
Worker	0.2899	0.2063	2.7584	7.4400e-003	0.7042	5.8900e-003	0.7101	0.1868	5.4200e-003	0.1922		740.9511	740.9511	0.0234		741.5351
Total	**0.3326**	**1.4827**	**3.0929**	**0.0106**	**0.7810**	**0.0119**	**0.7929**	**0.2089**	**0.0112**	**0.2201**		**1,073.3807**	**1,073.3807**	**0.0437**		**1,074.4719**

Regulatory Compliance Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.2793	6.1296	7.9624	0.0114		0.3855	0.3855		0.3855	0.3855	0.0000	1,102.9781	1,102.9781	0.3567		1,111.8962
Total	**0.2793**	**6.1296**	**7.9624**	**0.0114**		**0.3855**	**0.3855**		**0.3855**	**0.3855**	**0.0000**	**1,102.9781**	**1,102.9781**	**0.3567**		**1,111.8962**

Regulatory Compliance Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0427	1.2765	0.3345	3.1100e-003	0.0768	6.0100e-003	0.0828	0.0221	5.7500e-003	0.0279		332.4296	332.4296	0.0203		332.9368
Worker	0.2899	0.2063	2.7584	7.4400e-003	0.7042	5.8900e-003	0.7101	0.1868	5.4200e-003	0.1922		740.9511	740.9511	0.0234		741.5351
Total	**0.3326**	**1.4827**	**3.0929**	**0.0106**	**0.7810**	**0.0119**	**0.7929**	**0.2089**	**0.0112**	**0.2201**		**1,073.3807**	**1,073.3807**	**0.0437**		**1,074.4719**

3.5 Building Construction - 2021

Baseline Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.7750	7.9850	7.2637	0.0114		0.4475	0.4475		0.4117	0.4117		1,103.2158	1,103.2158	0.3568		1,112.1358

Total	**0.7750**	**7.9850**	**7.2637**	**0.0114**		**0.4475**	**0.4475**		**0.4117**	**0.4117**		**1,103.2158**	**1,103.2158**	**0.3568**		**1,112.1358**

Baseline Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0365	1.1651	0.3046	3.0900e-003	0.0768	2.3800e-003	0.0792	0.0221	2.2800e-003	0.0244		329.8568	329.8568	0.0194		330.3426
Worker	0.2701	0.1856	2.5375	7.2000e-003	0.7042	5.6900e-003	0.7099	0.1868	5.2400e-003	0.1920		717.4250	717.4250	0.0211		717.9535
Total	**0.3065**	**1.3507**	**2.8421**	**0.0103**	**0.7810**	**8.0700e-003**	**0.7891**	**0.2089**	**7.5200e-003**	**0.2164**		**1,047.2818**	**1,047.2818**	**0.0406**		**1,048.2961**

Regulatory Compliance Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.2793	6.1296	7.9624	0.0114		0.3855	0.3855		0.3855	0.3855	0.0000	1,103.2158	1,103.2158	0.3568		1,112.1358
Total	**0.2793**	**6.1296**	**7.9624**	**0.0114**		**0.3855**	**0.3855**		**0.3855**	**0.3855**	**0.0000**	**1,103.2158**	**1,103.2158**	**0.3568**		**1,112.1358**

Regulatory Compliance Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0365	1.1651	0.3046	3.0900e-003	0.0768	2.3800e-003	0.0792	0.0221	2.2800e-003	0.0244		329.8568	329.8568	0.0194		330.3426
Worker	0.2701	0.1856	2.5375	7.2000e-003	0.7042	5.6900e-003	0.7099	0.1868	5.2400e-003	0.1920		717.4250	717.4250	0.0211		717.9535
Total	**0.3065**	**1.3507**	**2.8421**	**0.0103**	**0.7810**	**8.0700e-003**	**0.7891**	**0.2089**	**7.5200e-003**	**0.2164**		**1,047.2818**	**1,047.2818**	**0.0406**		**1,048.2961**

3.6 Architectural Coating - 2020

Baseline Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	7.7244					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2422	1.6838	1.8314	2.9700e-003		0.1109	0.1109		0.1109	0.1109		281.4481	281.4481	0.0218		281.9928
Total	**7.9666**	**1.6838**	**1.8314**	**2.9700e-003**		**0.1109**	**0.1109**		**0.1109**	**0.1109**		**281.4481**	**281.4481**	**0.0218**		**281.9928**

Baseline Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					

Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0598	0.0426	0.5692	1.5400e-003	0.1453	1.2100e-003	0.1465	0.0385	1.1200e-003	0.0397		152.8947	152.8947	4.8200e-003		153.0152
Total	**0.0598**	**0.0426**	**0.5692**	**1.5400e-003**	**0.1453**	**1.2100e-003**	**0.1465**	**0.0385**	**1.1200e-003**	**0.0397**		**152.8947**	**152.8947**	**4.8200e-003**		**153.0152**

Regulatory Compliance Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	7.7244					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.0594	1.3570	1.8324	2.9700e-003		0.0951	0.0951		0.0951	0.0951	0.0000	281.4481	281.4481	0.0218		281.9928
Total	**7.7839**	**1.3570**	**1.8324**	**2.9700e-003**		**0.0951**	**0.0951**		**0.0951**	**0.0951**	**0.0000**	**281.4481**	**281.4481**	**0.0218**		**281.9928**

Regulatory Compliance Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0598	0.0426	0.5692	1.5400e-003	0.1453	1.2100e-003	0.1465	0.0385	1.1200e-003	0.0397		152.8947	152.8947	4.8200e-003		153.0152
Total	**0.0598**	**0.0426**	**0.5692**	**1.5400e-003**	**0.1453**	**1.2100e-003**	**0.1465**	**0.0385**	**1.1200e-003**	**0.0397**		**152.8947**	**152.8947**	**4.8200e-003**		**153.0152**

3.6 Architectural Coating - 2021

Baseline Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	7.7244					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2189	1.5268	1.8176	2.9700e-003		0.0941	0.0941		0.0941	0.0941		281.4481	281.4481	0.0193		281.9309
Total	**7.9433**	**1.5268**	**1.8176**	**2.9700e-003**		**0.0941**	**0.0941**		**0.0941**	**0.0941**		**281.4481**	**281.4481**	**0.0193**		**281.9309**

Baseline Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0557	0.0383	0.5236	1.4900e-003	0.1453	1.1700e-003	0.1465	0.0385	1.0800e-003	0.0396		148.0401	148.0401	4.3600e-003		148.1491
Total	**0.0557**	**0.0383**	**0.5236**	**1.4900e-003**	**0.1453**	**1.1700e-003**	**0.1465**	**0.0385**	**1.0800e-003**	**0.0396**		**148.0401**	**148.0401**	**4.3600e-003**		**148.1491**

Regulatory Compliance Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	7.7244					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.0594	1.3570	1.8324	2.9700e-003		0.0951	0.0951		0.0951	0.0951	0.0000	281.4481	281.4481	0.0193		281.9309
Total	**7.7839**	**1.3570**	**1.8324**	**2.9700e-003**		**0.0951**	**0.0951**		**0.0951**	**0.0951**	**0.0000**	**281.4481**	**281.4481**	**0.0193**		**281.9309**

Regulatory Compliance Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0557	0.0383	0.5236	1.4900e-003	0.1453	1.1700e-003	0.1465	0.0385	1.0800e-003	0.0396		148.0401	148.0401	4.3600e-003		148.1491
Total	**0.0557**	**0.0383**	**0.5236**	**1.4900e-003**	**0.1453**	**1.1700e-003**	**0.1465**	**0.0385**	**1.0800e-003**	**0.0396**		**148.0401**	**148.0401**	**4.3600e-003**		**148.1491**

3.7 Paving - 2021

Baseline Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.7214	6.7178	7.0899	0.0113		0.3534	0.3534		0.3286	0.3286		1,035.3425	1,035.3425	0.3016		1,042.8818

Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.7214**	**6.7178**	**7.0899**	**0.0113**		**0.3534**	**0.3534**		**0.3286**	**0.3286**		**1,035.3425**	**1,035.3425**	**0.3016**		**1,042.8818**

Baseline Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0772	0.0530	0.7250	2.0600e-003	0.2012	1.6300e-003	0.2028	0.0534	1.5000e-003	0.0549		204.9786	204.9786	6.0400e-003		205.1296
Total	**0.0772**	**0.0530**	**0.7250**	**2.0600e-003**	**0.2012**	**1.6300e-003**	**0.2028**	**0.0534**	**1.5000e-003**	**0.0549**		**204.9786**	**204.9786**	**6.0400e-003**		**205.1296**

Regulatory Compliance Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.2239	4.7579	6.9028	0.0113		0.2908	0.2908		0.2908	0.2908	0.0000	1,035.3425	1,035.3425	0.3016		1,042.8818
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.2239**	**4.7579**	**6.9028**	**0.0113**		**0.2908**	**0.2908**		**0.2908**	**0.2908**	**0.0000**	**1,035.3425**	**1,035.3425**	**0.3016**		**1,042.8818**

Regulatory Compliance Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0772	0.0530	0.7250	2.0600e-003	0.2012	1.6300e-003	0.2028	0.0534	1.5000e-003	0.0549		204.9786	204.9786	6.0400e-003		205.1296
Total	**0.0772**	**0.0530**	**0.7250**	**2.0600e-003**	**0.2012**	**1.6300e-003**	**0.2028**	**0.0534**	**1.5000e-003**	**0.0549**		**204.9786**	**204.9786**	**6.0400e-003**		**205.1296**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Regulatory Compliance	0.8994	4.3059	12.2487	0.0446	3.6241	0.0359	3.6600	0.9699	0.0335	1.0034		4,535.2229	4,535.2229	0.2267		4,540.8911
Baseline	0.8994	4.3059	12.2487	0.0446	3.6241	0.0359	3.6600	0.9699	0.0335	1.0034		4,535.2229	4,535.2229	0.2267		4,540.8911

4.2 Trip Summary Information

	Average Daily Trip Rate			Baseline	Regulatory Compliance
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT

Apartments Mid Rise	498.75	479.25	439.50	1,665,862	1,665,862
Enclosed Parking with Elevator	0.00	0.00	0.00		
Other Asphalt Surfaces	0.00	0.00	0.00		
Total	498.75	479.25	439.50	1,665,862	1,665,862

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Mid Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
Enclosed Parking with Elevator	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0
Other Asphalt Surfaces	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Mid Rise	0.546501	0.044961	0.204016	0.120355	0.015740	0.006196	0.020131	0.030678	0.002515	0.002201	0.005142	0.000687	0.000876
Enclosed Parking with Elevator	0.546501	0.044961	0.204016	0.120355	0.015740	0.006196	0.020131	0.030678	0.002515	0.002201	0.005142	0.000687	0.000876
Other Asphalt Surfaces	0.546501	0.044961	0.204016	0.120355	0.015740	0.006196	0.020131	0.030678	0.002515	0.002201	0.005142	0.000687	0.000876

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Regulatory Compliance	0.0204	0.1745	0.0743	1.1100e-003		0.0141	0.0141		0.0141	0.0141		222.8108	222.8108	4.2700e-003	4.0800e-003	224.1349
NaturalGas Baseline	0.0204	0.1745	0.0743	1.1100e-003		0.0141	0.0141		0.0141	0.0141		222.8108	222.8108	4.2700e-003	4.0800e-003	224.1349

5.2 Energy by Land Use - NaturalGas

Baseline

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Mid Rise	1893.89	0.0204	0.1745	0.0743	1.1100e-003		0.0141	0.0141		0.0141	0.0141		222.8108	222.8108	4.2700e-003	4.0800e-003	224.1349
Enclosed Parking with Elevator	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		**0.0204**	**0.1745**	**0.0743**	**1.1100e-003**		**0.0141**	**0.0141**		**0.0141**	**0.0141**		**222.8108**	**222.8108**	**4.2700e-003**	**4.0800e-003**	**224.1349**

Regulatory Compliance

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Mid Rise	1.89389	0.0204	0.1745	0.0743	1.1100e-003		0.0141	0.0141		0.0141	0.0141		222.8108	222.8108	4.2700e-003	4.0800e-003	224.1349
Enclosed Parking with Elevator	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		**0.0204**	**0.1745**	**0.0743**	**1.1100e-003**		**0.0141**	**0.0141**		**0.0141**	**0.0141**		**222.8108**	**222.8108**	**4.2700e-003**	**4.0800e-003**	**224.1349**

6.0 Area Detail

6.1 Mitigation Measures Area

Use Low VOC Paint - Residential Interior

Use Low VOC Paint - Residential Exterior

Use Low VOC Paint - Non-Residential Interior

Use Low VOC Paint - Non-Residential Exterior

Use Low VOC Cleaning Supplies

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Regulatory Compliance	1.4947	1.1290	6.6488	7.0800e-003		0.1197	0.1197		0.1197	0.1197	0.0000	1,361.1512	1,361.1512	0.0367	0.0248	1,369.4429
Baseline	1.4947	1.1290	6.6488	7.0800e-003		0.1197	0.1197		0.1197	0.1197	0.0000	1,361.1512	1,361.1512	0.0367	0.0248	1,369.4429

6.2 Area by SubCategory

Baseline

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.0952					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	1.0882					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	0.1238	1.0575	0.4500	6.7500e-003		0.0855	0.0855		0.0855	0.0855	0.0000	1,350.0000	1,350.0000	0.0259	0.0248	1,358.0224
Landscaping	0.1875	0.0715	6.1988	3.3000e-004		0.0342	0.0342		0.0342	0.0342		11.1512	11.1512	0.0108		11.4205

Total	**1.4947**	**1.1290**	**6.6488**	**7.0800e-003**		**0.1197**	**0.1197**		**0.1197**	**0.1197**	**0.0000**	**1,361.1512**	**1,361.1512**	**0.0366**	**0.0248**	**1,369.4429**

Regulatory Compliance

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.0952					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	1.0882					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	0.1238	1.0575	0.4500	6.7500e-003		0.0855	0.0855		0.0855	0.0855	0.0000	1,350.0000	1,350.0000	0.0259	0.0248	1,358.0224
Landscaping	0.1875	0.0715	6.1988	3.3000e-004		0.0342	0.0342		0.0342	0.0342		11.1512	11.1512	0.0108		11.4205
Total	**1.4947**	**1.1290**	**6.6488**	**7.0800e-003**		**0.1197**	**0.1197**		**0.1197**	**0.1197**	**0.0000**	**1,361.1512**	**1,361.1512**	**0.0366**	**0.0248**	**1,369.4429**

7.0 Water Detail

7.1 Mitigation Measures Water

Install Low Flow Bathroom Faucet

Install Low Flow Kitchen Faucet

Install Low Flow Toilet

Install Low Flow Shower

Use Water Efficient Irrigation System

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

1251 W. Sunset Blvd (Proposed)

Los Angeles-South Coast County, Winter

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Enclosed Parking with Elevator	37.00	Space	0.00	14,800.00	0
Other Asphalt Surfaces	7.53	1000sqft	0.00	7,530.00	0
Apartments Mid Rise	75.00	Dwelling Unit	0.46	54,558.85	215

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	33
Climate Zone	11			**Operational Year**	2022
Utility Company	Los Angeles Department of Water & Power				
CO2 Intensity (lb/MWhr)	1227.89	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - Project includes 75 units (Building A with two grade parking and B with one grade parking)

Construction Phase - Construction to start March 2019 and end early 2021

Trips and VMT - Assuming exported haul will be taken to Azusa Landfill

Demolition - Based on City of LA County Assessor Parcel Map
2640 + 2640
Grading - 18,500 cy of export

Woodstoves - No woodstoves

Construction Off-road Equipment Mitigation - Per CARB Title 13 CCR Section 2520-2427, equipment required to be Tier 4 Final for new equipment. SCAQMD recommends Tier 3 at the minimum.
Area Mitigation -

Water Mitigation -

Table Name	Column Name	Default Value	New Value
tblAreaMitigation	UseLowVOCPaintParkingCheck	False	True
tblConstDustMitigation	WaterUnpavedRoadVehicleSpeed	0	15
tblConstEquipMitigation	NumberOfEquipmentRegulatory Compliance	0.00	1.00
tblConstEquipMitigation	NumberOfEquipmentRegulatory Compliance	0.00	4.00
tblConstEquipMitigation	NumberOfEquipmentRegulatory Compliance	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentRegulatory Compliance	0.00	1.00
tblConstEquipMitigation	NumberOfEquipmentRegulatory Compliance	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentRegulatory Compliance	0.00	1.00
tblConstEquipMitigation	NumberOfEquipmentRegulatory Compliance	0.00	1.00
tblConstEquipMitigation	NumberOfEquipmentRegulatory Compliance	0.00	1.00
tblConstEquipMitigation	NumberOfEquipmentRegulatory Compliance	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentRegulatory Compliance	0.00	8.00
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3

tblConstructionPhase	NumDays	5.00	45.00
tblConstructionPhase	NumDays	100.00	365.00
tblConstructionPhase	NumDays	10.00	30.00
tblConstructionPhase	NumDays	2.00	120.00
tblConstructionPhase	NumDays	5.00	22.00
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	NumberWood	3.75	0.00
tblGrading	AcresOfGrading	0.00	0.46
tblGrading	MaterialExported	0.00	18,500.00
tblLandUse	LandUseSquareFeet	75,000.00	54,558.85
tblLandUse	LotAcreage	0.33	0.00
tblLandUse	LotAcreage	0.17	0.00
tblLandUse	LotAcreage	1.97	0.46
tblTripsAndVMT	HaulingTripLength	20.00	50.00
tblTripsAndVMT	HaulingTripLength	20.00	50.00
tblTripsAndVMT	HaulingTripNumber	2,313.00	2,312.00
tblWoodstoves	NumberCatalytic	3.75	0.00
tblWoodstoves	NumberNoncatalytic	3.75	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Baseline Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					

2019	1.4108	20.8308	10.9826	0.0483	1.7276	0.6204	2.3183	0.6771	0.5712	1.2409	0.0000	5,076.9855	5,076.9855	0.4647	0.0000	5,088.6021
2020	9.2613	12.0878	12.6354	0.0258	0.9263	0.6465	1.5728	0.2474	0.6039	0.8513	0.0000	2,549.4045	2,549.4045	0.4267	0.0000	2,560.0711
2021	9.9262	17.6988	19.9696	0.0387	1.1275	0.9060	2.0335	0.3008	0.8446	1.1453	0.0000	3,748.7370	3,748.7370	0.7281	0.0000	3,766.9384
Maximum	**9.9262**	**20.8308**	**19.9696**	**0.0483**	**1.7276**	**0.9060**	**2.3183**	**0.6771**	**0.8446**	**1.2409**	**0.0000**	**5,076.9855**	**5,076.9855**	**0.7281**	**0.0000**	**5,088.6021**

Regulatory Compliance Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2019	0.7230	18.1913	11.2289	0.0483	1.2553	0.4554	1.7106	0.4228	0.4530	0.8758	0.0000	5,076.9855	5,076.9855	0.4647	0.0000	5,088.6021
2020	8.4962	9.0383	13.2114	0.0258	0.9263	0.4938	1.4201	0.2474	0.4929	0.7404	0.0000	2,549.4045	2,549.4045	0.4267	0.0000	2,560.0711
2021	8.7736	13.7137	20.4962	0.0387	1.1275	0.7823	1.9098	0.3008	0.7815	1.0823	0.0000	3,748.7370	3,748.7370	0.7281	0.0000	3,766.9384
Maximum	**8.7736**	**18.1913**	**20.4962**	**0.0483**	**1.2553**	**0.7823**	**1.9098**	**0.4228**	**0.7815**	**1.0823**	**0.0000**	**5,076.9855**	**5,076.9855**	**0.7281**	**0.0000**	**5,088.6021**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**12.65**	**19.11**	**-3.09**	**0.00**	**12.49**	**20.32**	**14.92**	**20.75**	**14.47**	**16.65**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

2.2 Overall Operational

Baseline Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					

Area	1.4947	1.1290	6.6488	7.0800e-003		0.1197	0.1197		0.1197	0.1197	0.0000	1,361.1512	1,361.1512	0.0367	0.0248	1,369.4429
Energy	0.0204	0.1745	0.0743	1.1100e-003		0.0141	0.0141		0.0141	0.0141		222.8108	222.8108	4.2700e-003	4.0800e-003	224.1349
Mobile	0.8729	4.4116	11.6048	0.0424	3.6241	0.0361	3.6602	0.9699	0.0337	1.0035		4,317.0589	4,317.0589	0.2260		4,322.7075
Total	**2.3880**	**5.7151**	**18.3279**	**0.0506**	**3.6241**	**0.1699**	**3.7941**	**0.9699**	**0.1675**	**1.1374**	**0.0000**	**5,901.0208**	**5,901.0208**	**0.2669**	**0.0288**	**5,916.2853**

Regulatory Compliance Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	1.4947	1.1290	6.6488	7.0800e-003		0.1197	0.1197		0.1197	0.1197	0.0000	1,361.1512	1,361.1512	0.0367	0.0248	1,369.4429
Energy	0.0204	0.1745	0.0743	1.1100e-003		0.0141	0.0141		0.0141	0.0141		222.8108	222.8108	4.2700e-003	4.0800e-003	224.1349
Mobile	0.8729	4.4116	11.6048	0.0424	3.6241	0.0361	3.6602	0.9699	0.0337	1.0035		4,317.0589	4,317.0589	0.2260		4,322.7075
Total	**2.3880**	**5.7151**	**18.3279**	**0.0506**	**3.6241**	**0.1699**	**3.7941**	**0.9699**	**0.1675**	**1.1374**	**0.0000**	**5,901.0208**	**5,901.0208**	**0.2669**	**0.0288**	**5,916.2853**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	3/4/2019	4/12/2019	5	30	
2	Site Preparation	Site Preparation	4/13/2019	4/15/2019	5	1	
3	Grading	Grading	4/16/2019	9/30/2019	5	120	

4	Building Construction	Building Construction	10/1/2019	2/22/2021	5	365	
5	Architectural Coating	Architectural Coating	12/22/2020	2/22/2021	5	45	
6	Paving	Paving	1/22/2021	2/22/2021	5	22	

Acres of Grading (Site Preparation Phase): 0.5

Acres of Grading (Grading Phase): 0.46

Acres of Paving: 0

Residential Indoor: 110,482; Residential Outdoor: 36,827; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area:

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Rubber Tired Dozers	1	1.00	247	0.40
Demolition	Tractors/Loaders/Backhoes	2	6.00	97	0.37
Site Preparation	Graders	1	8.00	187	0.41
Site Preparation	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Grading	Concrete/Industrial Saws	1	8.00	81	0.73
Grading	Rubber Tired Dozers	1	1.00	247	0.40
Grading	Tractors/Loaders/Backhoes	2	6.00	97	0.37
Building Construction	Cranes	1	4.00	231	0.29
Building Construction	Forklifts	2	6.00	89	0.20
Building Construction	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Paving	Cement and Mortar Mixers	4	6.00	9	0.56
Paving	Pavers	1	7.00	130	0.42
Paving	Rollers	1	7.00	80	0.38
Paving	Tractors/Loaders/Backhoes	1	7.00	97	0.37
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	4	10.00	0.00	24.00	14.70	6.90	50.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	2	5.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	4	10.00	0.00	2,312.00	14.70	6.90	50.00	LD_Mix	HDT_Mix	HHDT
Building Construction	5	63.00	12.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	7	18.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	13.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Use Cleaner Engines for Construction Equipment

Water Exposed Area

Reduce Vehicle Speed on Unpaved Roads

3.2 Demolition - 2019

Baseline Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.1733	0.0000	0.1733	0.0262	0.0000	0.0262			0.0000			0.0000
Off-Road	0.9530	8.6039	7.6917	0.0120		0.5371	0.5371		0.5125	0.5125		1,159.6570	1,159.6570	0.2211		1,165.1847
Total	**0.9530**	**8.6039**	**7.6917**	**0.0120**	**0.1733**	**0.5371**	**0.7103**	**0.0262**	**0.5125**	**0.5387**		**1,159.6570**	**1,159.6570**	**0.2211**		**1,165.1847**

Baseline Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0167	0.5060	0.1183	1.4600e-003	0.0349	2.1900e-003	0.0371	9.5800e-003	2.0900e-003	0.0117		157.9148	157.9148	9.9500e-003		158.1636
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0554	0.0407	0.4425	1.1500e-003	0.1118	9.6000e-004	0.1127	0.0296	8.9000e-004	0.0305		114.2131	114.2131	3.9300e-003		114.3113
Total	**0.0721**	**0.5467**	**0.5608**	**2.6100e-003**	**0.1467**	**3.1500e-003**	**0.1499**	**0.0392**	**2.9800e-003**	**0.0422**		**272.1279**	**272.1279**	**0.0139**		**272.4749**

Regulatory Compliance Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.0676	0.0000	0.0676	0.0102	0.0000	0.0102			0.0000			0.0000
Off-Road	0.2652	5.9644	7.9381	0.0120		0.4017	0.4017		0.4017	0.4017	0.0000	1,159.6570	1,159.6570	0.2211		1,165.1847
Total	**0.2652**	**5.9644**	**7.9381**	**0.0120**	**0.0676**	**0.4017**	**0.4693**	**0.0102**	**0.4017**	**0.4119**	**0.0000**	**1,159.6570**	**1,159.6570**	**0.2211**		**1,165.1847**

Regulatory Compliance Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0167	0.5060	0.1183	1.4600e-003	0.0349	2.1900e-003	0.0371	9.5800e-003	2.0900e-003	0.0117		157.9148	157.9148	9.9500e-003		158.1636

Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0554	0.0407	0.4425	1.1500e-003	0.1118	9.6000e-004	0.1127	0.0296	8.9000e-004	0.0305		114.2131	114.2131	3.9300e-003		114.3113
Total	**0.0721**	**0.5467**	**0.5608**	**2.6100e-003**	**0.1467**	**3.1500e-003**	**0.1499**	**0.0392**	**2.9800e-003**	**0.0422**		**272.1279**	**272.1279**	**0.0139**		**272.4749**

3.3 Site Preparation - 2019

Baseline Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.5303	0.0000	0.5303	0.0573	0.0000	0.0573			0.0000			0.0000
Off-Road	0.7195	8.9170	4.1407	9.7500e-003		0.3672	0.3672		0.3378	0.3378		965.1690	965.1690	0.3054		972.8032
Total	**0.7195**	**8.9170**	**4.1407**	**9.7500e-003**	**0.5303**	**0.3672**	**0.8975**	**0.0573**	**0.3378**	**0.3951**		**965.1690**	**965.1690**	**0.3054**		**972.8032**

Baseline Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0277	0.0203	0.2212	5.7000e-004	0.0559	4.8000e-004	0.0564	0.0148	4.4000e-004	0.0153		57.1065	57.1065	1.9600e-003		57.1557
Total	**0.0277**	**0.0203**	**0.2212**	**5.7000e-004**	**0.0559**	**4.8000e-004**	**0.0564**	**0.0148**	**4.4000e-004**	**0.0153**		**57.1065**	**57.1065**	**1.9600e-003**		**57.1557**

Regulatory Compliance Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.2068	0.0000	0.2068	0.0223	0.0000	0.0223			0.0000			0.0000
Off-Road	0.2382	4.8716	5.8579	9.7500e-003		0.2405	0.2405		0.2405	0.2405	0.0000	965.1690	965.1690	0.3054		972.8032
Total	**0.2382**	**4.8716**	**5.8579**	**9.7500e-003**	**0.2068**	**0.2405**	**0.4473**	**0.0223**	**0.2405**	**0.2629**	**0.0000**	**965.1690**	**965.1690**	**0.3054**		**972.8032**

Regulatory Compliance Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0277	0.0203	0.2212	5.7000e-004	0.0559	4.8000e-004	0.0564	0.0148	4.4000e-004	0.0153		57.1065	57.1065	1.9600e-003		57.1557
Total	**0.0277**	**0.0203**	**0.2212**	**5.7000e-004**	**0.0559**	**4.8000e-004**	**0.0564**	**0.0148**	**4.4000e-004**	**0.0153**		**57.1065**	**57.1065**	**1.9600e-003**		**57.1557**

3.4 Grading - 2019

Baseline Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e

Category	lb/day										lb/day					
Fugitive Dust					0.7743	0.0000	0.7743	0.4169	0.0000	0.4169			0.0000			0.0000
Off-Road	0.9530	8.6039	7.6917	0.0120		0.5371	0.5371		0.5125	0.5125		1,159.6570	1,159.6570	0.2211		1,165.1847
Total	**0.9530**	**8.6039**	**7.6917**	**0.0120**	**0.7743**	**0.5371**	**1.3113**	**0.4169**	**0.5125**	**0.9293**		**1,159.6570**	**1,159.6570**	**0.2211**		**1,165.1847**

Baseline Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.4024	12.1862	2.8484	0.0351	0.8415	0.0527	0.8942	0.2306	0.0504	0.2810		3,803.1153	3,803.1153	0.2396		3,809.1062
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0554	0.0407	0.4425	1.1500e-003	0.1118	9.6000e-004	0.1127	0.0296	8.9000e-004	0.0305		114.2131	114.2131	3.9300e-003		114.3113
Total	**0.4578**	**12.2269**	**3.2908**	**0.0363**	**0.9533**	**0.0537**	**1.0070**	**0.2603**	**0.0513**	**0.3116**		**3,917.3284**	**3,917.3284**	**0.2436**		**3,923.4175**

Regulatory Compliance Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.3020	0.0000	0.3020	0.1626	0.0000	0.1626			0.0000			0.0000
Off-Road	0.2652	5.9644	7.9381	0.0120		0.4017	0.4017		0.4017	0.4017	0.0000	1,159.6570	1,159.6570	0.2211		1,165.1847

Total	**0.2652**	**5.9644**	**7.9381**	**0.0120**	**0.3020**	**0.4017**	**0.7037**	**0.1626**	**0.4017**	**0.5643**	**0.0000**	**1,159.6570**	**1,159.6570**	**0.2211**		**1,165.1847**

Regulatory Compliance Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.4024	12.1862	2.8484	0.0351	0.8415	0.0527	0.8942	0.2306	0.0504	0.2810		3,803.1153	3,803.1153	0.2396		3,809.1062
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0554	0.0407	0.4425	1.1500e-003	0.1118	9.6000e-004	0.1127	0.0296	8.9000e-004	0.0305		114.2131	114.2131	3.9300e-003		114.3113
Total	**0.4578**	**12.2269**	**3.2908**	**0.0363**	**0.9533**	**0.0537**	**1.0070**	**0.2603**	**0.0513**	**0.3116**		**3,917.3284**	**3,917.3284**	**0.2436**		**3,923.4175**

3.5 Building Construction - 2019

Baseline Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9576	9.8207	7.5432	0.0114		0.6054	0.6054		0.5569	0.5569		1,127.6696	1,127.6696	0.3568		1,136.5892
Total	**0.9576**	**9.8207**	**7.5432**	**0.0114**		**0.6054**	**0.6054**		**0.5569**	**0.5569**		**1,127.6696**	**1,127.6696**	**0.3568**		**1,136.5892**

Baseline Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0520	1.3906	0.4062	3.0500e-003	0.0768	9.0000e-003	0.0858	0.0221	8.6100e-003	0.0307		325.5325	325.5325	0.0229		326.1042
Worker	0.3489	0.2562	2.7876	7.2300e-003	0.7042	6.0700e-003	0.7103	0.1868	5.6000e-003	0.1924		719.5424	719.5424	0.0248		720.1612
Total	**0.4009**	**1.6468**	**3.1938**	**0.0103**	**0.7810**	**0.0151**	**0.7961**	**0.2089**	**0.0142**	**0.2231**		**1,045.0749**	**1,045.0749**	**0.0476**		**1,046.2655**

Regulatory Compliance Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.2793	6.1296	7.9624	0.0114		0.3855	0.3855		0.3855	0.3855	0.0000	1,127.6696	1,127.6696	0.3568		1,136.5892
Total	**0.2793**	**6.1296**	**7.9624**	**0.0114**		**0.3855**	**0.3855**		**0.3855**	**0.3855**	**0.0000**	**1,127.6696**	**1,127.6696**	**0.3568**		**1,136.5892**

Regulatory Compliance Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					

Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0520	1.3906	0.4062	3.0500e-003	0.0768	9.0000e-003	0.0858	0.0221	8.6100e-003	0.0307		325.5325	325.5325	0.0229		326.1042
Worker	0.3489	0.2562	2.7876	7.2300e-003	0.7042	6.0700e-003	0.7103	0.1868	5.6000e-003	0.1924		719.5424	719.5424	0.0248		720.1612
Total	**0.4009**	**1.6468**	**3.1938**	**0.0103**	**0.7810**	**0.0151**	**0.7961**	**0.2089**	**0.0142**	**0.2231**		**1,045.0749**	**1,045.0749**	**0.0476**		**1,046.2655**

3.5 Building Construction - 2020

Baseline Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.8617	8.8523	7.3875	0.0114		0.5224	0.5224		0.4806	0.4806		1,102.9781	1,102.9781	0.3567		1,111.8962
Total	**0.8617**	**8.8523**	**7.3875**	**0.0114**		**0.5224**	**0.5224**		**0.4806**	**0.4806**		**1,102.9781**	**1,102.9781**	**0.3567**		**1,111.8962**

Baseline Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0446	1.2762	0.3689	3.0300e-003	0.0768	6.1000e-003	0.0829	0.0221	5.8400e-003	0.0280		323.3389	323.3389	0.0216		323.8794
Worker	0.3219	0.2284	2.5264	7.0000e-003	0.7042	5.8900e-003	0.7101	0.1868	5.4200e-003	0.1922		697.6748	697.6748	0.0220		698.2246
Total	**0.3666**	**1.5046**	**2.8952**	**0.0100**	**0.7810**	**0.0120**	**0.7930**	**0.2089**	**0.0113**	**0.2201**		**1,021.0137**	**1,021.0137**	**0.0436**		**1,022.1040**

Regulatory Compliance Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.2793	6.1296	7.9624	0.0114		0.3855	0.3855		0.3855	0.3855	0.0000	1,102.9781	1,102.9781	0.3567		1,111.8962
Total	**0.2793**	**6.1296**	**7.9624**	**0.0114**		**0.3855**	**0.3855**		**0.3855**	**0.3855**	**0.0000**	**1,102.9781**	**1,102.9781**	**0.3567**		**1,111.8962**

Regulatory Compliance Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0446	1.2762	0.3689	3.0300e-003	0.0768	6.1000e-003	0.0829	0.0221	5.8400e-003	0.0280		323.3389	323.3389	0.0216		323.8794
Worker	0.3219	0.2284	2.5264	7.0000e-003	0.7042	5.8900e-003	0.7101	0.1868	5.4200e-003	0.1922		697.6748	697.6748	0.0220		698.2246
Total	**0.3666**	**1.5046**	**2.8952**	**0.0100**	**0.7810**	**0.0120**	**0.7930**	**0.2089**	**0.0113**	**0.2201**		**1,021.0137**	**1,021.0137**	**0.0436**		**1,022.1040**

3.5 Building Construction - 2021

Baseline Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.7750	7.9850	7.2637	0.0114		0.4475	0.4475		0.4117	0.4117		1,103.2158	1,103.2158	0.3568		1,112.1358
Total	**0.7750**	**7.9850**	**7.2637**	**0.0114**		**0.4475**	**0.4475**		**0.4117**	**0.4117**		**1,103.2158**	**1,103.2158**	**0.3568**		**1,112.1358**

Baseline Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0383	1.1627	0.3369	3.0000e-003	0.0768	2.4600e-003	0.0793	0.0221	2.3500e-003	0.0245		320.8146	320.8146	0.0207		321.3324
Worker	0.3004	0.2055	2.3200	6.7800e-003	0.7042	5.6900e-003	0.7099	0.1868	5.2400e-003	0.1920		675.5182	675.5182	0.0199		676.0151
Total	**0.3387**	**1.3681**	**2.6569**	**9.7800e-003**	**0.7810**	**8.1500e-003**	**0.7892**	**0.2089**	**7.5900e-003**	**0.2165**		**996.3328**	**996.3328**	**0.0406**		**997.3475**

Regulatory Compliance Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.2793	6.1296	7.9624	0.0114		0.3855	0.3855		0.3855	0.3855	0.0000	1,103.2158	1,103.2158	0.3568		1,112.1358

Total	**0.2793**	**6.1296**	**7.9624**	**0.0114**		**0.3855**	**0.3855**		**0.3855**	**0.3855**	**0.0000**	**1,103.2158**	**1,103.2158**	**0.3568**		**1,112.1358**

Regulatory Compliance Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0383	1.1627	0.3369	3.0000e-003	0.0768	2.4600e-003	0.0793	0.0221	2.3500e-003	0.0245		320.8146	320.8146	0.0207		321.3324
Worker	0.3004	0.2055	2.3200	6.7800e-003	0.7042	5.6900e-003	0.7099	0.1868	5.2400e-003	0.1920		675.5182	675.5182	0.0199		676.0151
Total	**0.3387**	**1.3681**	**2.6569**	**9.7800e-003**	**0.7810**	**8.1500e-003**	**0.7892**	**0.2089**	**7.5900e-003**	**0.2165**		**996.3328**	**996.3328**	**0.0406**		**997.3475**

3.6 Architectural Coating - 2020

Baseline Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	7.7244					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2422	1.6838	1.8314	2.9700e-003		0.1109	0.1109		0.1109	0.1109		281.4481	281.4481	0.0218		281.9928
Total	**7.9666**	**1.6838**	**1.8314**	**2.9700e-003**		**0.1109**	**0.1109**		**0.1109**	**0.1109**		**281.4481**	**281.4481**	**0.0218**		**281.9928**

Baseline Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0664	0.0471	0.5213	1.4500e-003	0.1453	1.2100e-003	0.1465	0.0385	1.1200e-003	0.0397		143.9647	143.9647	4.5400e-003		144.0781
Total	**0.0664**	**0.0471**	**0.5213**	**1.4500e-003**	**0.1453**	**1.2100e-003**	**0.1465**	**0.0385**	**1.1200e-003**	**0.0397**		**143.9647**	**143.9647**	**4.5400e-003**		**144.0781**

Regulatory Compliance Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	7.7244					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.0594	1.3570	1.8324	2.9700e-003		0.0951	0.0951		0.0951	0.0951	0.0000	281.4481	281.4481	0.0218		281.9928
Total	**7.7839**	**1.3570**	**1.8324**	**2.9700e-003**		**0.0951**	**0.0951**		**0.0951**	**0.0951**	**0.0000**	**281.4481**	**281.4481**	**0.0218**		**281.9928**

Regulatory Compliance Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					

Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0664	0.0471	0.5213	1.4500e-003	0.1453	1.2100e-003	0.1465	0.0385	1.1200e-003	0.0397		143.9647	143.9647	4.5400e-003		144.0781
Total	**0.0664**	**0.0471**	**0.5213**	**1.4500e-003**	**0.1453**	**1.2100e-003**	**0.1465**	**0.0385**	**1.1200e-003**	**0.0397**		**143.9647**	**143.9647**	**4.5400e-003**		**144.0781**

3.6 Architectural Coating - 2021

Baseline Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	7.7244					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2189	1.5268	1.8176	2.9700e-003		0.0941	0.0941		0.0941	0.0941		281.4481	281.4481	0.0193		281.9309
Total	**7.9433**	**1.5268**	**1.8176**	**2.9700e-003**		**0.0941**	**0.0941**		**0.0941**	**0.0941**		**281.4481**	**281.4481**	**0.0193**		**281.9309**

Baseline Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0620	0.0424	0.4787	1.4000e-003	0.1453	1.1700e-003	0.1465	0.0385	1.0800e-003	0.0396		139.3926	139.3926	4.1000e-003		139.4952
Total	**0.0620**	**0.0424**	**0.4787**	**1.4000e-003**	**0.1453**	**1.1700e-003**	**0.1465**	**0.0385**	**1.0800e-003**	**0.0396**		**139.3926**	**139.3926**	**4.1000e-003**		**139.4952**

Regulatory Compliance Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	7.7244					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.0594	1.3570	1.8324	2.9700e-003		0.0951	0.0951		0.0951	0.0951	0.0000	281.4481	281.4481	0.0193		281.9309
Total	**7.7839**	**1.3570**	**1.8324**	**2.9700e-003**		**0.0951**	**0.0951**		**0.0951**	**0.0951**	**0.0000**	**281.4481**	**281.4481**	**0.0193**		**281.9309**

Regulatory Compliance Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0620	0.0424	0.4787	1.4000e-003	0.1453	1.1700e-003	0.1465	0.0385	1.0800e-003	0.0396		139.3926	139.3926	4.1000e-003		139.4952
Total	**0.0620**	**0.0424**	**0.4787**	**1.4000e-003**	**0.1453**	**1.1700e-003**	**0.1465**	**0.0385**	**1.0800e-003**	**0.0396**		**139.3926**	**139.3926**	**4.1000e-003**		**139.4952**

3.7 Paving - 2021

Baseline Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.7214	6.7178	7.0899	0.0113		0.3534	0.3534		0.3286	0.3286		1,035.3425	1,035.3425	0.3016		1,042.8818
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.7214**	**6.7178**	**7.0899**	**0.0113**		**0.3534**	**0.3534**		**0.3286**	**0.3286**		**1,035.3425**	**1,035.3425**	**0.3016**		**1,042.8818**

Baseline Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0858	0.0587	0.6629	1.9400e-003	0.2012	1.6300e-003	0.2028	0.0534	1.5000e-003	0.0549		193.0052	193.0052	5.6800e-003		193.1472
Total	**0.0858**	**0.0587**	**0.6629**	**1.9400e-003**	**0.2012**	**1.6300e-003**	**0.2028**	**0.0534**	**1.5000e-003**	**0.0549**		**193.0052**	**193.0052**	**5.6800e-003**		**193.1472**

Regulatory Compliance Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.2239	4.7579	6.9028	0.0113		0.2908	0.2908		0.2908	0.2908	0.0000	1,035.3425	1,035.3425	0.3016		1,042.8818

Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.2239**	**4.7579**	**6.9028**	**0.0113**		**0.2908**	**0.2908**		**0.2908**	**0.2908**	**0.0000**	**1,035.3425**	**1,035.3425**	**0.3016**		**1,042.8818**

Regulatory Compliance Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0858	0.0587	0.6629	1.9400e-003	0.2012	1.6300e-003	0.2028	0.0534	1.5000e-003	0.0549		193.0052	193.0052	5.6800e-003		193.1472
Total	**0.0858**	**0.0587**	**0.6629**	**1.9400e-003**	**0.2012**	**1.6300e-003**	**0.2028**	**0.0534**	**1.5000e-003**	**0.0549**		**193.0052**	**193.0052**	**5.6800e-003**		**193.1472**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Regulatory Compliance	0.8729	4.4116	11.6048	0.0424	3.6241	0.0361	3.6602	0.9699	0.0337	1.0035		4,317.0589	4,317.0589	0.2260		4,322.7075
Baseline	0.8729	4.4116	11.6048	0.0424	3.6241	0.0361	3.6602	0.9699	0.0337	1.0035		4,317.0589	4,317.0589	0.2260		4,322.7075

4.2 Trip Summary Information

	Average Daily Trip Rate			Baseline	Regulatory Compliance
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Mid Rise	498.75	479.25	439.50	1,665,862	1,665,862
Enclosed Parking with Elevator	0.00	0.00	0.00		
Other Asphalt Surfaces	0.00	0.00	0.00		
Total	498.75	479.25	439.50	1,665,862	1,665,862

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Mid Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
Enclosed Parking with Elevator	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0
Other Asphalt Surfaces	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Mid Rise	0.546501	0.044961	0.204016	0.120355	0.015740	0.006196	0.020131	0.030678	0.002515	0.002201	0.005142	0.000687	0.000876
Enclosed Parking with Elevator	0.546501	0.044961	0.204016	0.120355	0.015740	0.006196	0.020131	0.030678	0.002515	0.002201	0.005142	0.000687	0.000876
Other Asphalt Surfaces	0.546501	0.044961	0.204016	0.120355	0.015740	0.006196	0.020131	0.030678	0.002515	0.002201	0.005142	0.000687	0.000876

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Regulatory Compliance	0.0204	0.1745	0.0743	1.1100e-003		0.0141	0.0141		0.0141	0.0141		222.8108	222.8108	4.2700e-003	4.0800e-003	224.1349
NaturalGas Baseline	0.0204	0.1745	0.0743	1.1100e-003		0.0141	0.0141		0.0141	0.0141		222.8108	222.8108	4.2700e-003	4.0800e-003	224.1349

5.2 Energy by Land Use - NaturalGas

Baseline

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Mid Rise	1893.89	0.0204	0.1745	0.0743	1.1100e-003		0.0141	0.0141		0.0141	0.0141		222.8108	222.8108	4.2700e-003	4.0800e-003	224.1349
Enclosed Parking with Elevator	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		**0.0204**	**0.1745**	**0.0743**	**1.1100e-003**		**0.0141**	**0.0141**		**0.0141**	**0.0141**		**222.8108**	**222.8108**	**4.2700e-003**	**4.0800e-003**	**224.1349**

Regulatory Compliance

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Mid Rise	1.89389	0.0204	0.1745	0.0743	1.1100e-003		0.0141	0.0141		0.0141	0.0141		222.8108	222.8108	4.2700e-003	4.0800e-003	224.1349
Enclosed Parking with Elevator	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		**0.0204**	**0.1745**	**0.0743**	**1.1100e-003**		**0.0141**	**0.0141**		**0.0141**	**0.0141**		**222.8108**	**222.8108**	**4.2700e-003**	**4.0800e-003**	**224.1349**

6.0 Area Detail

6.1 Mitigation Measures Area

Use Low VOC Paint - Residential Interior

Use Low VOC Paint - Residential Exterior

Use Low VOC Paint - Non-Residential Interior

Use Low VOC Paint - Non-Residential Exterior

Use Low VOC Cleaning Supplies

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Regulatory Compliance	1.4947	1.1290	6.6488	7.0800e-003		0.1197	0.1197		0.1197	0.1197	0.0000	1,361.1512	1,361.1512	0.0367	0.0248	1,369.4429
Baseline	1.4947	1.1290	6.6488	7.0800e-003		0.1197	0.1197		0.1197	0.1197	0.0000	1,361.1512	1,361.1512	0.0367	0.0248	1,369.4429

6.2 Area by SubCategory

Baseline

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					

Architectural Coating	0.0952					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	1.0882					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	0.1238	1.0575	0.4500	6.7500e-003		0.0855	0.0855		0.0855	0.0855	0.0000	1,350.0000	1,350.0000	0.0259	0.0248	1,358.0224
Landscaping	0.1875	0.0715	6.1988	3.3000e-004		0.0342	0.0342		0.0342	0.0342		11.1512	11.1512	0.0108		11.4205
Total	**1.4947**	**1.1290**	**6.6488**	**7.0800e-003**		**0.1197**	**0.1197**		**0.1197**	**0.1197**	**0.0000**	**1,361.1512**	**1,361.1512**	**0.0366**	**0.0248**	**1,369.4429**

Regulatory Compliance

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.0952					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	1.0882					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	0.1238	1.0575	0.4500	6.7500e-003		0.0855	0.0855		0.0855	0.0855	0.0000	1,350.0000	1,350.0000	0.0259	0.0248	1,358.0224
Landscaping	0.1875	0.0715	6.1988	3.3000e-004		0.0342	0.0342		0.0342	0.0342		11.1512	11.1512	0.0108		11.4205
Total	**1.4947**	**1.1290**	**6.6488**	**7.0800e-003**		**0.1197**	**0.1197**		**0.1197**	**0.1197**	**0.0000**	**1,361.1512**	**1,361.1512**	**0.0366**	**0.0248**	**1,369.4429**

7.0 Water Detail

7.1 Mitigation Measures Water

Install Low Flow Bathroom Faucet

Install Low Flow Kitchen Faucet

Install Low Flow Toilet

Install Low Flow Shower

Use Water Efficient Irrigation System

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

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SUPERINTENDENT OF BUILDING

OSAMA YOUNAN, P.E.
EXECUTIVE OFFICER

GEOLOGY AND SOILS REPORT APPROVAL LETTER

October 24, 2017

LOG # 97949-01
SOILS/GEOLOGY FILE - 2

AYM Investment LLC
5812 Washington Boulevard
Culver City, CA 90232

TRACT:	Angeleno Heights (MR 10-63/66)
BLOCK:	31
LOT(S):	25 & 27
LOCATION:	1251-1257 W. Sunset Boulevard

CURRENT REFERENCE REPORT/LETTER(S)	REPORT No.	DATE(S) OF DOCUMENT	PREPARED BY
Update Report	17-333-22	07/20/2017	Applied Earth Sciences

PREVIOUS REFERENCE REPORT/LETTER(S)	REPORT No.	DATE(S) OF DOCUMENT	PREPARED BY
Dept. Correction Letter	97949	05/24/2017	LADBS
Geology/Soils Report	17-333-22	04/04/2017	Applied Earth Sciences
Department Approval Letter	67649	06/16/2009	LADBS
Geology/Soils Report	RE 09-301	03/25/2009	Gustavo Robles

The Grading Division of the Department of Building and Safety has reviewed the referenced report that provides recommendations for the proposed seven-story apartment buildings. The consultant states that the building locations had been revised. The lower 2-3 levels will consist of parking. Retaining walls ranging up to 56 feet in height are proposed for the lower floor levels. The subject property is developed with 10 single-story residential buildings on terraced building pads that are elevated from the street. A slope ascends about 20 feet in height from the street to the building pads at gradients of about 1½:1 to 2½:1 (H:V). Subsurface exploration performed by the consultant consisted of four hand-auger borings and four test pits to a maximum depth of 14 feet. The earth materials at the subsurface exploration locations consist of up to 4 feet of uncertified fill underlain by colluvium and sedimentary bedrock. Geologic structure observed by the consultant consisted of southerly dipping bedding between 11 and 22 degrees. South-facing excavations are anticipated to expose unsupported bedding. The consultants recommend to support the proposed structures on conventional foundations bearing in competent bedrock.

The referenced reports are acceptable, provided the following conditions are complied with during site development:

AN EQUAL EMPLOYMENT OPPORTUNITY - AFFIRMATIVE ACTION EMPLOYER

(Note: Numbers in parenthesis ( ) refer to applicable sections of the 2017 City of LA Building Code. P/BC numbers refer the applicable Information Bulletin. Information Bulletins can be accessed on the internet at LADBS.ORG.)

1. Conformance with the Zoning Code Section 12.21 C8, which limits the heights and number of retaining walls, will be determined during structural plan check.

2. In the event tie-back anchors are utilized for shoring purposes, then provide a notarized letter from all adjoining property owners allowing tie-back anchors on their property. (7006.6)

3. Approval shall be obtained from the Department of Public Works, Bureau of Engineering, Development Services and Permits Program for the proposed removal of support and/or retaining of slopes adjoining to public way. (3307.3.2)

   201 N. Figueroa Street 3rd Floor, LA (213) 482-7045

4. The geologist and soils engineer shall review and approve the detailed plans prior to issuance of any permits. This approval shall be by signature on the plans that clearly indicates the geologist and soils engineer have reviewed the plans prepared by the design engineer and that the plans include the recommendations contained in their reports. (7006.1)

5. All recommendations of the reports that are in addition to or more restrictive than the conditions contained herein shall be incorporated into the plans.

6. A copy of the subject and appropriate referenced reports and this approval letter shall be attached to the District Office and field set of plans. Submit one copy of the above reports to the Building Department Plan Checker prior to issuance of the permit. (7006.1)

7. A grading permit shall be obtained for all structural fill and retaining wall backfill. (106.1.2)

8. All graded, brushed or bare slopes shall be planted with low-water consumption, native-type plant varieties to protect slopes against erosion. (7012)

9. All new graded slopes shall be no steeper than 2H:1V (7010.2 & 7011.2).

10. Prior to the issuance of any permit, an accurate volume determination shall be made and included in the final plans, with regard to the amount of earth material to be exported from the site. For grading involving import or export of more than 1000 cubic yards of earth materials within the grading hillside area, approval is required by the Board of Building and Safety. Application for approval of the haul route must be filed with the Board of Building and Safety Commission Office. Processing time for application is approximately 8 weeks to hearing plus 10-day appeal period.

11. All man-made fill shall be compacted to a minimum 90 percent of the maximum dry density of the fill material per the latest version of ASTM D 1557. Where cohesionless soil having less than 15 percent finer than 0.005 millimeters is used for fill, it shall be compacted to a minimum of 95 percent relative compaction based on maximum dry density (D1556). Placement of gravel in lieu of compacted fill is allowed only if complying with Section 91.7011.3 of the Code. (7011.3)

12. Existing uncertified fill shall not be used for support of footings, concrete slabs or new fill. (1809.2, 7011.3)

13. Drainage in conformance with the provisions of the Code shall be maintained during and subsequent to construction. (7013.12)

14. Grading shall be scheduled for completion prior to the start of the rainy season, or detailed temporary erosion control plans shall be filed in a manner satisfactory to the Grading Division of the Department and the Department of Public Works, Bureau of Engineering, B-Permit Section, for any grading work in excess of 200 cu yd. (7007.1)

201 N. Figueroa Street 3rd Floor, LA (213) 482-7045

15. The applicant is advised that the approval of this report does not waive the requirements for excavations contained in the State Construction Safety Orders enforced by the State Division of Industrial Safety. (3301.1)

16. Temporary excavations that remove lateral support to the public way, adjacent property, or adjacent structures shall be supported by shoring. Note: Lateral support shall be considered to be removed when the excavation extends below a plane projected downward at an angle of 45 degrees from the bottom of a footing of an existing structure, from the edge of the public way or an adjacent property. (3307.3.1)

17. Where any excavation, not addressed in the approved reports, would remove lateral support (as defined in 3307.3.1) from a public way, adjacent property or structures, a supplemental report shall be submitted to the Grading Division of the Department containing recommendations for shoring, underpinning, and sequence of construction. Shoring recommendations shall include the maximum allowable lateral deflection of shoring system to prevent damage to adjacent structures, properties and/or public ways. Report shall include a plot plan and cross-section(s) showing the construction type, number of stories, and location of adjacent structures, and analysis incorporating all surcharge loads that demonstrate an acceptable factor of safety against failure. (7006.2 & 3307.3.2)

18. Prior to the issuance of any permit which authorizes an excavation where the excavation is to be of a greater depth than are the walls or foundation of any adjoining building or structure and located closer to the property line than the depth of the excavation, the owner of the subject site shall provide the Department with evidence that the adjacent property owner has been given a 30-day written notice of such intent to make an excavation. (3307.1)

19. The soils engineer shall review and approve the shoring plans prior to issuance of the permit. (3307.3.2)

20. Prior to the issuance of the permits, the soils engineer and/or the structural designer shall evaluate the surcharge loads used in the report calculations for the design of the retaining walls and shoring. If the surcharge loads used in the calculations do not conform to the actual surcharge loads, the soil engineer shall submit a supplementary report with revised recommendations to the Department for approval.

21. Unsurcharged temporary excavations exposing unsupported geology and/or unsupported bedding planes shall be trimmed back along the lowest unsupported plane or at a 1H:1V slope inclination, whichever is flatter, or shored, as recommended.

22. Unsurcharged temporary excavations over 5 feet exposing soil shall be trimmed back at a gradient not exceeding 1:1.

23. Unsurcharged temporary excavations in favorably-oriented bedrock may be cut vertical up to 10 feet. For excavations over 10 feet, the lower 10 feet may be cut vertically and the portion of the excavation above 10 feet shall be trimmed back at a gradient not exceeding 1:1 (horizontal to vertical).

24. Shoring shall be designed for the lateral earth pressures specified starting on page 11 of the 04/04/2017 report; all surcharge loads shall be included into the design. Total lateral load on shoring piles shall be determined by multiplying the recommended EFP by the pile spacing.

25. Shoring shall be designed for a maximum lateral deflection of ½ inch where a structure is within a 1:1 plane projected up from the base of the excavation, and for a maximum lateral deflection of 1 inch provided there are no structures within a 1:1 plane projected up from the base of the excavation, as recommended.

26. A shoring monitoring program shall be implemented to the satisfaction of the soils engineer.

27. The installation and testing of tie-back anchors shall comply with the recommendations included in the report or the standard sheets titled "Requirement for Tie-back Earth Anchors", whatever is more restrictive. (Research Report #23835)

28. All foundations shall derive entire support from competent bedrock, as recommended and approved by the geologist and soils engineer by inspection.

29. Buildings adjacent to ascending slopes steeper than 3:1 (H:V) in gradient shall be set back from the toe of the slope a level distance equal to one-half the vertical height of the slope, but need not exceed 15 feet (1808.7.1).

30. Slabs placed on approved compacted fill shall be at least 3½ inches thick and shall be reinforced with ½-inch diameter (#4) reinforcing bars spaced maximum of 16 inches on center each way.

31. Concrete floor slabs placed on expansive soil shall be placed on a 4-inch fill of coarse aggregate or on a moisture barrier membrane. The slabs shall be at least 3½ inches thick and shall be reinforced with ½-inch diameter (#4) reinforcing bars spaced maximum of 16 inches on center each way.

32. The seismic design shall be based on a Site Class C as recommended. All other seismic design parameters shall be reviewed by LADBS building plan check.

33. Cantilevered retaining walls shall be designed for the lateral earth pressures specified on page 18 of the 04/04/2017 report. Note: Where two separate stacked retaining walls (the upper wall surcharges the lower wall) are proposed, the lower of the two walls shall be designed for the combined height of the two walls. All surcharge loads shall be included into the design.

34. Retaining walls higher than 6 feet shall be designed for lateral earth pressure due to earthquake motions as specified on page 18 of the 04/04/2017 report (1803.5.12).

Note: Lateral earth pressure due to earthquake motions shall be in addition to static lateral earth pressures and other surcharge pressures. The height of a stacked retaining wall shall be considered as the summation of the heights of each wall.

35. Basement walls and other walls in which horizontal movement is restricted at the top shall be designed for a minimum at-rest pressure as specified on page 2 of the 07/20/2017 report (1610.1). All surcharge loads shall be included into the design.

36. Retaining walls at the base of ascending slopes shall be provided with freeboard.

37. The recommended equivalent fluid pressure (EFP) for the proposed retaining wall shall apply from the top of the freeboard to the bottom of the wall footing.

38. All retaining walls shall be provided with a standard surface backdrain system and all drainage shall be conducted to the street in an acceptable manner and in a non-erosive device. (7013.11)

39. With the exception of retaining walls designed for hydrostatic pressure, all retaining walls shall be provided with a subdrain system to prevent possible hydrostatic pressure behind the wall. Prior to issuance of any permit, the retaining wall subdrain system recommended in the soil report shall be incorporated into the foundation plan which shall be reviewed and approved by the soils engineer of record. (1805.4)

40. Installation of the subdrain system shall be inspected and approved by the soils engineer of record and the City grading/building inspector. (108.9)

41. Basement walls and floors shall be waterproofed/damp-proofed with an L.A. City approved "Below-grade" waterproofing/damp-proofing material with a research report number. (104.2.6)

42. Prefabricated drainage composites (Miradrain, Geotextiles) may be only used in addition to traditionally accepted methods of draining retained earth.

43. Where the ground water table is lowered and maintained at an elevation not less than 6 inches below the bottom of the lowest floor, or where hydrostatic pressures will not occur, the floor and basement walls shall be damp-proofed. Where a hydrostatic pressure condition exists, and the design does not include a ground-water control system, basement walls and floors shall be waterproofed. (1803.5.4, 1805.1.3, 1805.2, 1805.3)

44. The structure shall be connected to the public sewer system. (P/BC 2014-027)

45. An on-site storm water infiltration system at the subject site shall not be implemented, as recommended.

46. All roof and pad drainage shall be conducted to the street in an acceptable manner; water shall not be dispersed on to descending slopes without specific approval from the Grading Division and the consulting geologist and soils engineer. (7013.10)

47. Any recommendations prepared by the geologist and/or the soils engineer for correction of geological hazards found during grading shall be submitted to the Grading Division of the Department for approval prior to utilization in the field. (7008.2, 7008.3)

48. The geologist and soils engineer shall inspect all excavations to determine that conditions anticipated in the report have been encountered and to provide recommendations for the correction of hazards found during grading. (7008 & 1705.6)

49. Prior to the pouring of concrete, a representative of the consulting soils engineer shall inspect and approve the footing excavations. He/She shall post a notice on the job site for the LADBS Building Inspector and the Contractor stating that the work so inspected meets the conditions of the report, but that no concrete shall be poured until the City Building Inspector has also inspected and approved the footing excavations. A written certification to this effect shall be filed with the Grading Division of the Department upon completion of the work. (108.9 & 7008.2)

50. Prior to excavation, an initial inspection shall be called with LADBS Inspector at which time sequence of construction, shoring, pile installation, protection fences and dust and traffic control will be scheduled. (108.9.1)

51. Installation of shoring, underpinning, slot cutting excavations and/or pile installation shall be performed under the inspection and approval of the soils engineer and deputy grading inspector. (1705.6)

52. Prior to the placing of compacted fill, a representative of the soils engineer shall inspect and approve the bottom excavations. He/She shall post a notice on the job site for the City Grading Inspector and the Contractor stating that the soil inspected meets the conditions of the report, but that no fill shall be placed until the LADBS Grading Inspector has also inspected and approved the bottom excavations. A written certification to this effect shall be included in the final compaction report filed with the Grading Division of the Department. All fill shall be placed under the inspection and approval of the soils engineer. A compaction report together with the approved soil report and Department approval letter shall be submitted to the Grading Division of the Department upon completion of the compaction. In addition, an Engineer's Certificate of Compliance with the legal description as indicated in the grading permit and the permit number shall be included. (7011.3)

EDMOND LEE
Engineering Geologist Associate II

GLEN RAAD
Geotechnical Engineer I

Log No. 97949-01
213-482-0480

cc: Andy Simhaee, Applicant
Applied Earth Sciences, Project Consultant
LA District Office

Los Angeles
HOUSING+COMMUNITY
Investment Department

Eric Garcetti, Mayor
Rushmore D. Cervantes, General Manager

DATE: October 25, 2018

TO: AYM Investment LLC, a California limited liability company, Owner

FROM: for Robert Manford, Environmental Affairs Officer
Los Angeles Housing and Community Investment Department

SUBJECT: **AB 2556 (TOC) Determination for**
1251 – 1255 ½ W. Sunset Blvd., Los Angeles, CA 90026
1257 – 1259 W. Sunset Blvd., Los Angeles, CA 90026

Based on the Affordable Unit Determination Application submitted by Andy Simhaee (Owner Representative) on behalf of AYM Investment LLC, a California limited liability company (Owner), the Los Angeles Housing and Community Investment Department (HCIDLA) has determined that seven (7) units are subject to replacement under AB 2556 (formerly AB 2222).

Information about the property for the five years prior to the date of the application is required in order to make a determination. HCIDLA received the Affordable Unit Determination Application on September 7, 2018, so HCIDLA must collect data from September 2013 through September 2018.

AYM Investment LLC, a California limited liability company (Owner), acquired the properties 1251 – 1255 ½ W. Sunset Blvd., on Lot 25, under APN# 5406-016-026 on January 27th, 2016 per Grant Deed.

AYM Investment LLC, a California limited liability company (Owner), acquired the properties 1257 – 1259 W. Sunset Blvd., on Lot 27, under APN# 5406-015-001 on January 27th, 2016 per Grant Deed.

Per Department of City Planning (ZIMAS), County Assessor Parcel Information (LUPAMS), Real Quest database, Billing Information System (BIMS) database, Code, Compliance, and Rent Information (CRIS) database, Internet Search, Rent Stabilization Ordinance Unit (RSO), 1251 – 1255 ½ W. Sunset Blvd., under APN# 5406-016-026, has a use code of "0500 – 5+ Units/4 Stories or Less".

Per Department of City Planning (ZIMAS), County Assessor Parcel Information (LUPAMS), Real Quest database, Billing Information System (BIMS) database, Code, Compliance, and Rent Information (CRIS) database, Internet Search, Rent Stabilization Ordinance Unit (RSO), 1257 – 1259 W. Sunset Blvd., under APN# 5406-015-001, has a use code of "0500 – 5+ Units/4 Stories or Less".

The Los Angeles Department of Building and Safety database indicates that the Owner applied for Demolition Permit 18019-20000-03894, permit not issued. The Los Angeles Department of Building and Safety database indicates that the Owner applied for Building Permit 18010-10000-02808, permit not issued. The Los Angeles Department of Building and Safety database indicates that the Owner applied for Building Permit 18010-10000-02809, permit not issued. The Los Angeles Department of Building and Safety database indicates that the Owner applied for Demolition Permit 18019-20000-03893, permit not issued. The Los Angeles Department of Building and Safety database indicates that the Owner applied for Building Permit 16010-10000-04836, permit not issued. The Los Angeles Department of Building and Safety database indicates that the Owner applied for Building Permit

16010-10000-05307, permit not issued. The Los Angeles Department of Building and Safety database indicates that the Owner applied for Building Permit 16010-10000-04439, permit not issued.

Per the statement provided by the Owner and received by HCIDLA on September 7, 2018, the Owner proposes to construct a new seventy (70) unit apartment building, pursuant to Transit Oriented Communities (TOC) guidelines.

Address	Bedroom Type
1251 Sunset Blvd.	1
1251 ½ Sunset Blvd.	1
1253 Sunset Blvd.	1
1253 ¼ Sunset Blvd.	1
1253 ½ Sunset Blvd.	1
1255 Sunset Blvd.	1
1255 ¼ Sunset Blvd.	1
1255 ½ Sunset Blvd.	1
1257 Sunset Blvd.	1
1257 ½ Sunset Blvd.	1

Per AB 2556, the number of RSO replacement units must match the percent of renter households currently living at Extremely Low, Very Low, and Low Income levels in Los Angeles per Department of Housing and Urban Development's (HUD) Comprehensive Housing Affordability Strategy (CHAS) database. At present, the CHAS database shows 31% Extremely Low (Below 31% Area Median Income [AMI]), 19% Very Low (31% to 50% AMI), and 18% Low (51% to 80% AMI) renter households for Los Angeles.

Replacement Units = 7

10 Units x 68%	**7 Units**
31% Extremely Low	4 Units
19% Very Low	2 Units
18% Low	1 Unit

As shown above, there existed ten (10) RSO units within the past five (5) years with no income documents provided. Consistent with AB 2556, HCIDLA has determined that seven (7) units need to be replaced with equivalent type, with four (4) units restricted to Extremely Low Income Households, two (2) units restricted to Very Low Income Households, and one (1) unit restricted to Low Income Households. Please note, replacement units are rounded up. This AB 2556 determination only applies to TOC rental projects.

NOTE: This determination is provisional and is subject to verification by HCIDLA's Rent Division.

cc: Los Angeles Housing and Community Investment Department File
AYM Investment LLC, a California limited liability company, Owner
Ulises Gonzalez, Case Management Section, City Planning Department

RM:MAC:mz

Connect Create Collaborate

Stephanie Escobar <stephanie.escobar@lacity.org>

Case No. DIR-2018-6634-TOC

36 messages

turtletracks@earthlink.net <turtletracks@earthlink.net> Thu, Aug 26, 2021 at 5:36 PM
To: Stephanie.escobar@lacity.org

Ms. Escobar:

Were there no public hearings for this case *prior* to approval?
Were residents notified?

---

turtletracks@earthlink.net <turtletracks@earthlink.net> Sun, Aug 29, 2021 at 5:49 PM
To: Stephanie.escobar@lacity.org
Cc: vince.bertoni@lacity.org

Ms. Escobar:

I have not received a response from you regarding the public hearing process on this matter.

The other question I had for you was where I'd be able to locate the documents showing the environmental study with findings proving the site is in conformance with the Alquist Priolo Act, since it sits on top of an active earthquake fault and toxic chemicals in another issue.

Finally, on what grounds is the City giving away all of those entitlements with no community input?

Thank you for the information.

------ Forwarded Message
From: "turtletracks@earthlink.net" <turtletracks@earthlink.net>
Date: Thu, 26 Aug 2021 17:36:37 -0700
To: <Stephanie.escobar@lacity.org>
Conversation: Case No. DIR-2018-6634-TOC
Subject: Case No. DIR-2018-6634-TOC

Ms. Escobar:

Were there no public hearings for this case *prior* to approval?
Were residents notified?

------ End of Forwarded Message

Anna Orellana <anna.orellana@lacity.org> Mon, Aug 30, 2021 at 6:27 AM
To: Stephanie Escobar <stephanie.escobar@lacity.org>
Cc: Oliver Netburn <oliver.netburn@lacity.org>, Heather Bleemers <Heather.Bleemers@lacity.org>, Lisa Webber <lisa.webber@lacity.org>

Morning

Please see the email that was sent to Vince.

Thanks

---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Mon, Aug 30, 2021 at 6:23 AM
Subject: Fwd: FW: Case No. DIR-2018-6634-TOC
To: Anna Orellana <anna.orellana@lacity.org>

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Suite 525C
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271 | F: (213) 978-1275
E: vince.bertoni@lacity.org

[Quoted text hidden]

--

Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271

Heather Bleemers <Heather.Bleemers@lacity.org>
To: Esther Ahn <esther.ahn@lacity.org>, Stephanie Escobar <stephanie.escobar@lacity.org>

Good morning,

Can you please follow up with this constituent?

Thank you!
[Quoted text hidden]
--

Heather Bleemers
Senior City Planner
Preferred Pronouns: She, Hers, Her
Los Angeles City Planning
221 N. Figueroa St., Suite 1350
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1322

Heather Bleemers <Heather.Bleemers@lacity.org>
To: Anna Orellana <anna.orellana@lacity.org>
Cc: Lisa Webber <lisa.webber@lacity.org>, Oliver Netburn <oliver.netburn@lacity.org>, Stephanie Escobar <stephanie.escobar@lacity.org>

Good morning,

Thank you for forwarding this email. We will respond.

- Heather
[Quoted text hidden]
--

Heather Bleemers
Senior City Planner
Preferred Pronouns: She, Hers, Her
Los Angeles City Planning
221 N. Figueroa St., Suite 1350
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1322

Stephanie Escobar <stephanie.escobar@lacity.org> Mon, Aug 30, 2021 at 8:14 AM
To: Heather Bleemers <Heather.Bleemers@lacity.org>
Cc: Esther Ahn <esther.ahn@lacity.org>

On it. Thank you for following up.
[Quoted text hidden]
--

Stephanie Escobar

Planning Assistant
Los Angeles City Planning
200 N. Spring St., Room 763
Los Angeles, CA 90012
Planning4LA.org
E: Stephanie.Escobar@lacity.org

Stephanie Escobar <stephanie.escobar@lacity.org> Mon, Aug 30, 2021 at 8:31 AM
To: "turtletracks@earthlink.net" <turtletracks@earthlink.net>

Hello,

Thank you for reaching out. The entitlement requested for this project is a TOC - Transit Oriented Communities project which does not require a public hearing.
In order to view the case file documents you will need to coordinate with our records management section. Let me follow up with more information on how to proceed with records management.
Additionally, all abutting owners receive a decision letter.

[Quoted text hidden]
[Quoted text hidden]

---

turtletracks@earthlink.net <turtletracks@earthlink.net> Mon, Aug 30, 2021 at 11:28 AM
To: Stephanie Escobar <stephanie.escobar@lacity.org>
Cc: "vince.bertoni@lacity.org" <vince.bertoni@lacity.org>

Thank you for the information.

The LOD also mentions a decision made by HCIDLA on 10/25/2018. Can you please provide a copy of this letter? And also why the LOD says: *"(RSO) units within the past five (5) years with no income documents provided?"* The property owner has been collecting rents from the tenants on this property. It is a false representation to inform your department there is/was no income.

The case files are supposed to be available on line to the public. Including environmental documents showing the issues with the earthquake fault and the methane. The LOD does not include these documents showing these issues exist and that they were evaluated.

Thank you.

On 8/30/21 8:31 AM, "Stephanie Escobar" <stephanie.escobar@lacity.org> wrote:

> Hello,
>
> Thank you for reaching out. The entitlement requested for this project is a TOC - Transit Oriented Communities project which does not require a public hearing.
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> Additionally, all abutting owners receive a decision letter.
>
> On Sun, Aug 29, 2021 at 5:49 PM turtletracks@earthlink.net <turtletracks@earthlink.net> wrote:
>
> > Ms. Escobar:
> >
> > I have not received a response from you regarding the public hearing process on this matter.
> >
> > The other question I had for you was where I'd be able to locate the documents showing the environmental study with findings proving the site is in conformance with the Alquist Priolo Act, since it sits on top of an active earthquake fault and toxic chemicals in another issue.
> >
> > Finally, on what grounds is the City giving away all of those entitlements with no community input?
> >
> > Thank you for the information.
> >
> > ------ Forwarded Message
> > **From:** "turtletracks@earthlink.net <http://turtletracks@earthlink.net> " <turtletracks@earthlink.net <http://turtletracks@earthlink.net> >
> > **Date:** Thu, 26 Aug 2021 17:36:37 -0700
> > **To:** <Stephanie.escobar@lacity.org <http://Stephanie.escobar@lacity.org> >
> > [Quoted text hidden]

Anna Orellana <anna.orellana@lacity.org> Mon, Aug 30, 2021 at 11:53 AM
To: Stephanie Escobar <stephanie.escobar@lacity.org>
Cc: Oliver Netburn <oliver.netburn@lacity.org>, Heather Bleemers <Heather.Bleemers@lacity.org>, Flora Melendez <flora.melendez@lacity.org>

Hello

Please see the email Vince received.

Thanks
---------- Forwarded message ---------
From: **Vince Bertoni** <vince.bertoni@lacity.org>
Date: Mon, Aug 30, 2021 at 11:35 AM
Subject: Fwd: Case No. DIR-2018-6634-TOC
To: Anna Orellana <anna.orellana@lacity.org>

Vincent P. Bertoni, AICP
Pronouns: He, His, Him
Director of Planning
Los Angeles City Planning
200 N. Spring St., Suite 525C
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Planning4LA.org
T: (213) 978-1271 | F: (213) 978-1275
E: vince.bertoni@lacity.org

---------- Forwarded message ---------
From: **turtletracks@earthlink.net** <turtletracks@earthlink.net>
Date: Mon, Aug 30, 2021 at 11:28 AM
Subject: Re: Case No. DIR-2018-6634-TOC
To: Stephanie Escobar <stephanie.escobar@lacity.org>
Cc: vince.bertoni@lacity.org <vince.bertoni@lacity.org>
[Quoted text hidden]

--

Anna Orellana
Secretary
Los Angeles City Planning
200 N. Spring St., Room 525
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271
[Quoted text hidden]

Stephanie Escobar <stephanie.escobar@lacity.org> Mon, Aug 30, 2021 at 11:57 AM
To: Anna Orellana <anna.orellana@lacity.org>
Cc: Oliver Netburn <oliver.netburn@lacity.org>, Heather Bleemers <Heather.Bleemers@lacity.org>, Flora Melendez <flora.melendez@lacity.org>

Thank you Anna.
I am currently communicating and coordinating with the constituent turtletracks@earthlink.net.

best,

Stephanie
[Quoted text hidden]
--

Stephanie Escobar
Planning Assistant
Los Angeles City Planning
200 N. Spring St., Room 763
Los Angeles, CA 90012
Planning4LA.org
E: Stephanie.Escobar@lacity.org

Stephanie Escobar <stephanie.escobar@lacity.org> Mon, Aug 30, 2021 at 1:44 PM
To: "turtletracks@earthlink.net" <turtletracks@earthlink.net>

I am happy to help you gather the information you need.

The project did not show up in a state registry to be in a fault zone.
The project will comply with LADBS measures and has an approved soils report from LADBS.
Attached you will find the requested HCID Letter and the categorical exemption justification from the applicant. Please let me know if you would like to view any other materials.

- Stephanie
[Quoted text hidden]
[Quoted text hidden]

1251 Justification.pdf
543K

Stephanie Escobar <stephanie.escobar@lacity.org> Mon, Aug 30, 2021 at 1:45 PM
To: "turtletracks@earthlink.net" <turtletracks@earthlink.net>

HCID.
[Quoted text hidden]

Final AB 2556 TOC Memo.pdf
164K

turtletracks@earthlink.net <turtletracks@earthlink.net> Mon, Aug 30, 2021 at 2:09 PM
To: Stephanie Escobar <stephanie.escobar@lacity.org>

Thank you.

Can you please advise on who wrote this letter? What agency is this from and what exactly is the intention or protocol that would require this letter?

There is no evidence to support anything mentioned in this letter.
Your reports continue to say "there will be no impact" yet the department is failing to include cumulative impacts. In addition to removing RSO housing units from the market.

The cities general plan specifically states preservation of existing RSO units is the plans intention.

Thank you.

On 8/30/21 1:44 PM, "Stephanie Escobar" <stephanie.escobar@lacity.org> wrote:

> I am happy to help you gather the information you need.
>
> The project did not show up in a state registry to be in a fault zone.
> The project will comply with LADBS measures and has an approved soils report from LADBS.
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> - Stephanie
>
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> >
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> >
> > The case files are supposed to be available on line to the public. Including environmental documents showing the issues with the earthquake fault and the methane. The LOD does not include these documents showing these issues exist and that they were evaluated.
> >
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> >
> > On 8/30/21 8:31 AM, "Stephanie Escobar" <stephanie.escobar@lacity.org <http://stephanie.escobar@lacity.org> > wrote:
> >
> > > Hello,
> > >
> > > Thank you for reaching out. The entitlement requested for this project is a TOC - Transit Oriented Communities project which does not require a public hearing.
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Thank you for the information.

------ Forwarded Message
From: "turtletracks@earthlink.net <http://turtletracks@earthlink.net> <http://turtletracks@earthlink.net> " <turtletracks@earthlink.net <http://turtletracks@earthlink.net> <http://turtletracks@earthlink.net> >
Date: Thu, 26 Aug 2021 17:36:37 -0700
To: <Stephanie.escobar@lacity.org <http://Stephanie.escobar@lacity.org> <http://Stephanie.escobar@lacity.org> >
[Quoted text hidden]

1251 Justification[1].pdf
543K

Stephanie Escobar <stephanie.escobar@lacity.org> Tue, Aug 31, 2021 at 8:16 AM
To: "turtletracks@earthlink.net" <turtletracks@earthlink.net>

The letter was written by the Housing + Community Investment Department - they assess the current status of housing where new development is proposed and determine whether there are existing affordable units in case they need to be replaced.
As noted in HCID's letter, there will be a total of seven units replaced meaning the replaced units will also be affordable.
Would you be interested in a contact person from HCID?

Please let me know if you have any other questions.

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To: Stephanie Escobar <stephanie.escobar@lacity.org>

Why is HCIDLA including a watershed map in their letter, with no signature or letterhead, and talking about CEQA?
Please see the attached you sent me.

They are removing 10 existing RSO units. Why are they not putting all ten back and what happens to the tenants who live in them now?

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On Mon, Aug 30, 2021 at 2:09 PM turtletracks@earthlink.net <turtletracks@earthlink.net> wrote:

Thank you.

Can you please advise on who wrote this letter? What agency is this from and what exactly is the intention or protocol that would require this letter?

There is no evidence to support anything mentioned in this letter.
Your reports continue to say "there will be no impact" yet the department is failing to include cumulative impacts. In addition to removing RSO housing units from the market.

The cities general plan specifically states preservation of existing RSO units is the plans intention.

Thank you.

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I am happy to help you gather the information you need.

The project did not show up in a state registry to be in a fault zone.
The project will comply with LADBS measures and has an approved soils report from LADBS.
Attached you will find the requested HCID Letter and the categorical exemption justification from the applicant. Please let me know if you would like to view any other materials.

- Stephanie

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The case files are supposed to be available on line to the public. Including environmental documents showing the issues with the earthquake fault and the methane. The LOD does not include these documents showing these issues exist and that they were evaluated.

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1251 Justification[1][5].pdf
543K

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Final AB 2556 TOC Memo.pdf
164K

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543K

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turtletracks@earthlink.net <turtletracks@earthlink.net> Wed, Sep 1, 2021 at 5:45 PM
To: Stephanie Escobar <stephanie.escobar@lacity.org>
Cc: "vince.bertoni@lacity.org" <vince.bertoni@lacity.org>, councilmember.cedillo@lacity.org

Ms. Escobar:

I've been asking you for copies of the case files for this case for 6 days now.

By refusing access of the documents you are denying me due process which is impacting the public's rights to appeal this project, both the DIR and the CE.

I again respectfully request copies (which are already digitized and exist in electronic form) of the entitlement docs, application and Environmental Assessment Form, Categorical Exemption form, and the other documents your department based its approval on, related to case number: **DIR-2018-6634-TOC** and **ENV-2018-6635-CE.**

As the deadline to appeal approaches reducing the time the public has to file a timely appeal, should we not receive the requested documents by tomorrow 9/2, we will be informing the City Planning Commission and requesting they extend the time to appeal based on the Department of City Planning's denial of due process.

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Attached you will find the requested HCID Letter and the categorical exemption justification from the applicant. Please let me know if you would like to view any other materials.

- Stephanie

On Mon, Aug 30, 2021 at 11:28 AM turtletracks@earthlink.net wrote:

Thank you for the information.

The LOD also mentions a decision made by HCIDLA on 10/25/2018. Can you please provide a copy of this letter? And also why the LOD says: "*(RSO) units within the past five (5) years with no income documents provided?*" The property owner has been collecting rents from the tenants on this property. It is a false representation to inform your department there is/was no income.

The case files are supposed to be available on line to the public. Including environmental documents showing the issues with the earthquake fault and the methane. The LOD does not include these documents showing these issues exist and that they were evaluated.

Thank you.

On 8/30/21 8:31 AM, "Stephanie Escobar" <stephanie.escobar@lacity.org> wrote:

Hello,

Thank you for reaching out. The entitlement requested for this project is a TOC - Transit Oriented Communities project which does not require a public hearing.
In order to view the case file documents you will need to coordinate with our records management section. Let me follow up with more information on how to proceed with records management.
Additionally, all abutting owners receive a decision letter.

On Sun, Aug 29, 2021 at 5:49 PM turtletracks@earthlink.net wrote:

Ms. Escobar:

I have not received a response from you regarding the public hearing process on this matter.

The other question I had for you was where I'd be able to locate the documents showing the environmental study with findings proving the site is in conformance with the Alquist Priolo Act, since it sits on top of an active earthquake fault and toxic chemicals in another issue.

Finally, on what grounds is the City giving away all of those entitlements with no community input?

Thank you for the information.

------ Forwarded Message

[Quoted text hidden]

Flora Melendez <flora.melendez@lacity.org> Thu, Sep 2, 2021 at 7:19 AM
To: Stephanie Escobar <stephanie.escobar@lacity.org>, Oliver Netburn <oliver.netburn@lacity.org>, Heather Bleemers <Heather.Bleemers@lacity.org>
Cc: Estineh Mailian <estineh.mailian@lacity.org>, Lisa Webber <lisa.webber@lacity.org>

Hello.

I'm forwarding an email received by Vince and Stephanie.

Thank you.

~ Angie

Flora (Angie) Melendez
Pronouns: she/hers/her
Executive Administrative Assistant III
Los Angeles City Planning
200 N. Spring St., Suite 525C
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1271 | F: (213) 978-1275
E: flora.melendez@lacity.org

---------- Forwarded message ---------
From: **turtletracks@earthlink.net** <turtletracks@earthlink.net>
Date: Wed, Sep 1, 2021 at 5:45 PM
Subject: Re: Case No. DIR-2018-6634-TOC
To: Stephanie Escobar <stephanie.escobar@lacity.org>
[Quoted text hidden]
[Quoted text hidden]

Stephanie Escobar <stephanie.escobar@lacity.org> Thu, Sep 2, 2021 at 7:26 AM
To: "turtletracks@earthlink.net" <turtletracks@earthlink.net>
Cc: "vince.bertoni@lacity.org" <vince.bertoni@lacity.org>, councilmember.cedillo@lacity.org

Good morning,

Please be assured I am here to help gather any information you may need. See attached requested documents and let me know if there are any other documents you may need.
Additionally, I will follow up this email with additional documents that need to be scanned.
I hope this helps.

best regards,

Stephanie

[Quoted text hidden]
[Quoted text hidden]

7 attachments

- **7771.1.pdf** 2228K
- **2018-8-29 1251 Sunset Technical Memorandum (rev1).pdf** 1608K
- **Referral Form - 1251 Sunset Bl.pdf** 236K
- **CEN18-47028_1251 Sunset Blvd_tech memo_apts (1).pdf** 415K
- **MERIDIAN_1251WSunset_AQStudy.pdf** 1580K
- **MERIDIAN_1251WSunset_NoiseStudy.pdf** 1278K
- **Final AB 2556 TOC Memo.pdf** 164K

Mail Delivery Subsystem <mailer-daemon@googlemail.com> Thu, Sep 2, 2021 at 7:27 AM
To: stephanie.escobar@lacity.org

Address not found

Your message wasn't delivered to **councilmember.cedillo@lacity.org** because the address couldn't be found, or is unable to receive mail.

LEARN MORE

The response was:

```
The email account that you tried to reach does not exist. Please try double-checking the recipient's email address for typos or unnecessary
spaces. Learn more at https://support.google.com/mail/answer/6596
```

Final-Recipient: rfc822; councilmember.cedillo@lacity.org
Action: failed
Status: 5.0.0
Diagnostic-Code: smtp; The email account that you tried to reach does not exist. Please try double-checking the recipient's email address for typos or unnecessary spaces. Learn more at https://support.google.com/mail/answer/6596
Last-Attempt-Date: Thu, 02 Sep 2021 07:27:21 -0700 (PDT)

---------- Forwarded message ----------
From: Stephanie Escobar <stephanie.escobar@lacity.org>
To: "turtletracks@earthlink.net" <turtletracks@earthlink.net>
Cc: "vince.bertoni@lacity.org" <vince.bertoni@lacity.org>, councilmember.cedillo@lacity.org
Bcc:
Date: Thu, 2 Sep 2021 07:26:26 -0700
Subject: Re: Case No. DIR-2018-6634-TOC
----- Message truncated -----

Stephanie Escobar <stephanie.escobar@lacity.org> Thu, Sep 2, 2021 at 7:30 AM
To: Flora Melendez <flora.melendez@lacity.org>
Cc: Oliver Netburn <oliver.netburn@lacity.org>, Heather Bleemers <Heather.Bleemers@lacity.org>, Estineh Mailian <estineh.mailian@lacity.org>, Lisa Webber <lisa.webber@lacity.org>

Hello,

I have been communicating with the respective constituent and working to provide them with what they need.

Thank you

Stephanie
[Quoted text hidden]
--

Stephanie Escobar
Planning Assistant
Los Angeles City Planning
200 N. Spring St., Room 763
Los Angeles, CA 90012
Planning4LA.org
E: Stephanie.Escobar@lacity.org

Heather Bleemers <Heather.Bleemers@lacity.org>
To: Esther Ahn <esther.ahn@lacity.org>, Stephanie Escobar <stephanie.escobar@lacity.org>

Ugh. Let's chat about this today and then I'll call this person to see what's going on. You are doing a great job!
[Quoted text hidden]
--

Heather Bleemers
Senior City Planner
Preferred Pronouns: She, Hers, Her
Los Angeles City Planning
221 N. Figueroa St., Suite 1350
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1322

Stephanie Escobar <stephanie.escobar@lacity.org> Thu, Sep 2, 2021 at 8:07 AM
To: Heather Bleemers <Heather.Bleemers@lacity.org>
Cc: Esther Ahn <esther.ahn@lacity.org>

That would be great. Thank you Heather.
[Quoted text hidden]

Estineh Mailian <estineh.mailian@lacity.org> Thu, Sep 2, 2021 at 8:53 AM
To: Stephanie Escobar <stephanie.escobar@lacity.org>

Thank you Stephannie. Please let us know if you need any support.

Estineh Mailian
Pronouns: She, Her, Hers
Chief Zoning Administrator
Los Angeles City Planning
200 N. Spring St., Room 763
Los Angeles, CA 90012
Planning4LA.org
T (213) 978-1318 | D (213) 978-1313

[Quoted text hidden]

Stephanie Escobar <stephanie.escobar@lacity.org> Thu, Sep 2, 2021 at 8:59 AM
To: "turtletracks@earthlink.net" <turtletracks@earthlink.net>, Heather Bleemers <heather.bleemers@lacity.org>

Hello again,

Please find attached additional documents and please let me know if there is anything else I can assist with.

Stephanie

[Quoted text hidden]

3 attachments

Soils Approval Letter.pdf
1068K

NOE.pdf
2125K

EAF Form.pdf
4079K

turtletracks@earthlink.net <turtletracks@earthlink.net> Thu, Sep 2, 2021 at 2:22 PM
To: Stephanie Escobar <stephanie.escobar@lacity.org>, Heather Bleemers <heather.bleemers@lacity.org>

Thank you.
Can you please send the paperwork related to the Vesting Tract Map? It appears two lots are intended to be tied which requires compliance with the subdivision map act.

There also does not appear to be rents included; which implies these RSO units were not registered with the housing department, yet the owner collected rents in addition to increasing the rent during the pandemic.

Thank you.

On 9/2/21 8:59 AM, "Stephanie Escobar" <stephanie.escobar@lacity.org> wrote:

> Hello again,
>
> Please find attached additional documents and please let me know if there is anything else I can assist with.
>
> Stephanie
>
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>
> > Good morning,
> >
> > Please be assured I am here to help gather any information you may need. See attached requested documents and let me know if there are any other documents you may need. Additionally, I will follow up this email with additional documents that need to be scanned.

I hope this helps.

best regards,

Stephanie

On Wed, Sep 1, 2021 at 5:45 PM turtletracks@earthlink.net <turtletracks@earthlink.net> wrote:

> Ms. Escobar:
>
> I've been asking you for copies of the case files for this case for 6 days now.
>
> By refusing access of the documents you are denying me due process which is impacting the public's rights to appeal this project, both the DIR and the CE.
>
> I again respectfully request copies (which are already digitized and exist in electronic form) of the entitlement docs, application and Environmental Assessment Form, Categorical Exemption form, and the other documents your department based its approval on, related to case number: **DIR-2018-6634-TOC** and **ENV-2018-6635-CE.**
>
> As the deadline to appeal approaches reducing the time the public has to file a timely appeal, should we not receive the requested documents by tomorrow 9/2, we will be informing the City Planning Commission and requesting they extend the time to appeal based on the Department of City Planning's denial of due process.
>
> Thank you.

On 9/1/21 11:58 AM, "Stephanie Escobar" <stephanie.escobar@lacity.org <http://stephanie.escobar@lacity.org> > wrote:

> Thank you for checking back. I received the link from a HCID employee and thought it was an email as it has the same format. Its a link: https://hcidla2.lacity.org/ask-hcidla
> The Department of City Planning works with HCID to make determinations on housing. Per HCID's determination the project is required to replace seven units.
> The project is a Transit Oriented Communities project developed under Measure JJJ. The project will be providing Extremely Low Income affordable units and is in compliance with HCID.

On Wed, Sep 1, 2021 at 11:36 AM turtletracks@earthlink.net <http://turtletracks@earthlink.net> <turtletracks@earthlink.net <http://turtletracks@earthlink.net> > wrote:

> *"If you have HCID specific questions this is their contact HCIDLA2.lacity.org <http://HCIDLA2.lacity.org> <http://HCIDLA2.lacity.org> "*
> HCIDLA2.lacity.org <http://HCIDLA2.lacity.org> <http://HCIDLA2.lacity.org> is not a valid email address.
>
> *"income documents were not acquired in their required information gathering of five-years prior to the applicant's HCID application"*
> Income documents were not acquired – meaning the department did not receive any because the applicant did not provide any? If income documents are required, which I believe they are, why were they not provided?
>
> HCIDLA is not the approving body of the project. The Department of City Planning is the body having jurisdiction over the project approval. If the project fails to comply with the general plans of the city, it should be denied.
>
> This project removes existing RSO housing, which again, according to the plan, must be preserved.

On 9/1/21 11:22 AM, "Stephanie Escobar" <stephanie.escobar@lacity.org <http://stephanie.escobar@lacity.org> <http://stephanie.escobar@lacity.org> wrote:

> Yes, the attachment did not load with the first email, therefore I sent it separately a minute after at 1:45pm, 8/30. My apologies.
> This project was filed in 2018 and received approval from the Housing + Community Investment Department (10/25/18) who determine whether affordable units need to be replaced and/or if tenants need to be relocated.
> The owner of the property has owned the property since 2016 and filed the project in 2018.
> Per HCID's determination letter, income documents were not acquired in their required information gathering of five-years prior to the applicant's HCID application.
> If you have HCID specific questions this is their contact HCIDLA2.lacity.org <http://HCIDLA2.lacity.org> <http://HCIDLA2.lacity.org> <http://HCIDLA2.lacity.org>

Please let me know how I can be of assistance.

best,

On Tue, Aug 31, 2021 at 6:11 PM turtletracks@earthlink.net <http://turtletracks@earthlink.net> > wrote:

Yes, in your 1:45 email to me of yesterday, 8/30, there was only 1 attachment you provided and not what was described (attached).
"*Attached you will find the requested HCID Letter and the categorical exemption justification from the applicant. Please let me know if you would like to view any other materials. "*

Can you please answer the questions? Thank you.
They are removing 10 existing RSO units. Why are they not putting all ten back and what happens to the tenants who live in them now?
Can you please also advise as to why the LOD indicates no income was provided ?

Thank you.

On 8/31/21 5:12 PM, "Stephanie Escobar" <stephanie.escobar@lacity.org <http://stephanie.escobar@lacity.org> > wrote:

Hi, I attached two separate documents one is the HCID letter and the other is the applicant's categorical exemption justification as mentioned - which is the CEQA document you are referring to.
Additionally, maybe you missed my second email with HCID's determination letter, so here it is attached. I hope this helps.

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Why is HCIDLA including a watershed map in their letter, with no signature or letterhead, and talking about CEQA?
Please see the attached you sent me.

They are removing 10 existing RSO units. Why are they not putting all ten back and what happens to the tenants who live in them now?

On 8/31/21 8:16 AM, "Stephanie Escobar" wrote:

The letter was written by the Housing + Community Investment Department - they assess the current status of housing where new development is proposed and determine whether there are existing affordable units in case they need to be replaced.
As noted in HCID's letter, there will be a total of seven units replaced meaning the replaced units will also be affordable.
Would you be interested in a contact person from HCID?

Please let me know if you have any other questions.

best regards,

Stephanie

On Mon, Aug 30, 2021 at 2:09 PM turtletracks@earthlink.net <http://turtletracks@earthlink.net> wrote:

Thank you.

Can you please advise on who wrote this letter? What agency is this from and what exactly is the intention or protocol that would require this letter?

There is no evidence to support anything mentioned in this letter.
Your reports continue to say "there will be no impact" yet the department is failing to include cumulative impacts. In addition to removing RSO housing units from the market.

The cities general plan specifically states preservation of existing RSO units is the plans intention.

Thank you.

On 8/30/21 1:44 PM, "Stephanie Escobar" <stephanie.escobar@lacity.org <http://stephanie.escobar@lacity.org> > wrote:

I am happy to help you gather the information you need.

The project did not show up in a state registry to be in a fault zone.
The project will comply with LADBS measures and has an approved soils report from LADBS.
Attached you will find the requested HCID Letter and the categorical exemption justification from the applicant. Please let me know if you would like to view any other materials.

- Stephanie

On Mon, Aug 30, 2021 at 11:28 AM turtletracks@earthlink.net <http://turtletracks@earthlink.net> wrote:

Thank you for the information.

The LOD also mentions a decision made by HCIDLA on 10/25/2018. Can you please provide a copy of this letter? And also why the LOD says: *"(RSO) units within the past five (5) years with no income documents provided?"* The property owner has been collecting rents from the tenants on this property. It is a false representation to inform your department there is/was no income.

The case files are supposed to be available on line to the public. Including environmental documents showing the issues with the earthquake fault and the methane. The LOD does not include these documents showing these issues exist and that they were evaluated.

Thank you.

On 8/30/21 8:31 AM, "Stephanie Escobar" <stephanie.escobar@lacity.org <http://stephanie.escobar@lacity.org> > wrote:

Hello,

Thank you for reaching out. The entitlement requested for this project is a TOC - Transit Oriented Communities project which does not require a public hearing.
In order to view the case file documents you will need to coordinate with our records management section. Let me follow up with more information on how to proceed with records management.
Additionally, all abutting owners receive a decision letter.

On Sun, Aug 29, 2021 at 5:49 PM turtletracks@earthlink.net <http://turtletracks@earthlink.net> wrote:
[Quoted text hidden]

Heather Bleemers <Heather.Bleemers@lacity.org>
To: "turtletracks@earthlink.net" <turtletracks@earthlink.net>
Cc: Stephanie Escobar <stephanie.escobar@lacity.org>

Good afternoon,

Thank you for reaching out to the Planning Department regarding this case. At this time, there are no land division requests with the Planning Department. If in the event that it is discovered Building and Safety, the applicant would need to either comply or seek an entitlement. We can pass your email along to the applicant so that they are aware of your concerns regarding the r

Best,

Heather

Heather Bleemers
Senior City Planner
Preferred Pronouns: She, Hers, Her
Los Angeles City Planning
221 N. Figueroa St., Suite 1350
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1322

[Quoted text hidden]

---

turtletracks@earthlink.net <turtletracks@earthlink.net> Thu, Sep 2, 2021 at 2:35 PM
To: Heather Bleemers <Heather.Bleemers@lacity.org>
Cc: Stephanie Escobar <stephanie.escobar@lacity.org>

Hello.

The rental income information is supposed to be reported as part of the application process. My "concern" would be directed towards the department as to why they issued approvals when the applicant failed to disclose rental income from the ten tenants.

The project already is in conflict with the subdivision map act if you have already approved a "lot tie" without a Vesting tract map.

The applicant has already reached the maximum amount of entitlements he is allowed. Your department actually approved one concession too many based on the amount of units he is alleging to put back.

On 9/2/21 2:29 PM, "Heather Bleemers" <Heather.Bleemers@lacity.org> wrote:

Good afternoon,

Thank you for reaching out to the Planning Department regarding this case. At this time, there are no land division requests with the Planning Department. If in the event that it is discovered that the project is in conflict with the Subdivision Map Act during plan check with Building and Safety, the applicant would need to either comply or seek an entitlement. We can pass your email along to the applicant so that they are aware of your concerns regarding the rental units.

Best,

Heather
Heather Bleemers Senior City Planner
Preferred Pronouns: She, Hers, Her
Los Angeles City Planning
221 N. Figueroa St., Suite 1350Los Angeles, CA 90012Planning4LA.orgT: (213) 978-1322

<https://www.facebook.com/Planning4LA/> <https://www.instagram.com/planning4la/> <https://twitter.com/Planning4LA> <https://www.youtube.com/channel/UChl2PmRhAzUf158o0vZjnHw/videos> <https://www.linkedin.com/company/los-angeles-department-of-city-planning> <http://bit.ly/DCPEmail>

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Thank you.
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There also does not appear to be rents included; which implies these RSO units were not registered with the housing department, yet the owner collected rents in addition to increasing the rent during the pandemic.

Thank you.

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Hello again,

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Stephanie

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I hope this helps.

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Ms. Escobar:

I've been asking you for copies of the case files for this case for 6 days now.

By refusing access of the documents you are denying me due process which is impacting the public's rights to appeal this project, both the DIR and the CE.

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Thank you.

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- Stephanie

On Mon, Aug 30, 2021 at 11:28 AM turtletracks@earthlink.net <http://turtletracks@earthlink.net> <http://turtletracks@earthlink.net> wrote:

Thank you for the information.

The LOD also mentions a decision made by HCIDLA on 10/25/2018. Can you please provide a copy of this letter? And also why the LOD says: *"(RSO) units within the past five (5) years with no income documents provided?"* The property owner has been collecting rents from the tenants on this property. It is a false representation to inform your department there is/was no income.

The case files are supposed to be available on line to the public. Including environmental documents showing the issues with the earthquake fault and the methane. The LOD does not include these documents showing these issues exist and that they were evaluated.

Thank you.

On 8/30/21 8:31 AM, "Stephanie Escobar" <stephanie.escobar@lacity.org <http://stephanie.escobar@lacity.org> <http://stephanie.escobar@lacity.org> > wrote:

Hello,

Thank you for reaching out. The entitlement requested for this project is a TOC - Transit Oriented Communities project which does not require a public hearing.
In order to view the case file documents you will need to coordinate with our records management section. Let me follow up with more information on how to proceed with records management.
Additionally, all abutting owners receive a decision letter.

On Sun, Aug 29, 2021 at 5:49 PM turtletracks@earthlink.net <http://turtletracks@earthlink.net> <http://turtletracks@earthlink.net> wrote:

Ms. Escobar:

I have not received a response from you regarding the public hearing process on this matter.

The other question I had for you was where I'd be able to locate the documents showing the environmental study with findings proving the site is in conformance with the Alquist Priolo Act, since it sits on top of an active earthquake fault and toxic chemicals in another issue.

Finally, on what grounds is the City giving away all of those entitlements with no community input?

Thank you for the information.

------ Forwarded Message

[Quoted text hidden]

---

turtletracks@earthlink.net <turtletracks@earthlink.net> Fri, Sep 3, 2021 at 5:53 PM
To: Stephanie Escobar <stephanie.escobar@lacity.org>

Please send over the seismic report that was done for the proposal.

Thank you.

On 8/31/21 8:16 AM, "Stephanie Escobar" <stephanie.escobar@lacity.org> wrote:

The letter was written by the Housing + Community Investment Department - they assess the current status of housing where new development is proposed and determine whether there are existing affordable units in case they need to be replaced.
As noted in HCID's letter, there will be a total of seven units replaced meaning the replaced units will also be affordable.
Would you be interested in a contact person from HCID?

Please let me know if you have any other questions.

best regards,

Stephanie

On Mon, Aug 30, 2021 at 2:09 PM turtletracks@earthlink.net <turtletracks@earthlink.net> wrote:

Thank you.

Can you please advise on who wrote this letter? What agency is this from and what exactly is the intention or protocol that would require this letter?

There is no evidence to support anything mentioned in this letter.
Your reports continue to say "there will be no impact" yet the department is failing to include cumulative impacts. In addition to removing RSO housing units from the market.

The cities general plan specifically states preservation of existing RSO units is the plans intention.

Thank you.

On 8/30/21 1:44 PM, "Stephanie Escobar" <stephanie.escobar@lacity.org <http://stephanie.escobar@lacity.org> > wrote:

I am happy to help you gather the information you need.

The project did not show up in a state registry to be in a fault zone.
The project will comply with LADBS measures and has an approved soils report from LADBS.
Attached you will find the requested HCID Letter and the categorical exemption justification from the applicant. Please let me know if you would like to view any other materials.

- Stephanie

On Mon, Aug 30, 2021 at 11:28 AM turtletracks@earthlink.net <http://turtletracks@earthlink.net> <turtletracks@earthlink.net <http://turtletracks@earthlink.net> > wrote:

Thank you for the information.

The LOD also mentions a decision made by HCIDLA on 10/25/2018. Can you please provide a copy of this letter? And also why the LOD says: *"(RSO) units within the past five (5) years with no income documents provided?"* The property owner has been collecting rents from the tenants on this property. It is a false representation to inform your department there is/was no income.

The case files are supposed to be available on line to the public. Including environmental documents showing the issues with the earthquake fault and the methane. The LOD does not include these documents showing these issues exist and that they were evaluated.

Thank you.

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Hello,

Thank you for reaching out. The entitlement requested for this project is a TOC - Transit Oriented Communities project which does not require a public hearing.
In order to view the case file documents you will need to coordinate with our records management section. Let me follow up with more information on how to proceed with records management.
Additionally, all abutting owners receive a decision letter.

On Sun, Aug 29, 2021 at 5:49 PM turtletracks@earthlink.net <http://turtletracks@earthlink.net> <http://turtletracks@earthlink.net> <turtletracks@earthlink.net <http://turtletracks@earthlink.net> <http://turtletracks@earthlink.net> > wrote:

Ms. Escobar:

I have not received a response from you regarding the public hearing process on this matter.

The other question I had for you was where I'd be able to locate the documents showing the environmental study with findings proving the site is in conformance with the Alquist Priolo Act, since it sits on top of an active earthquake fault and toxic chemicals in another issue.

Finally, on what grounds is the City giving away all of those entitlements with no community input?

Thank you for the information.

------ Forwarded Message
From: "turtletracks@earthlink.net <http://turtletracks@earthlink.net> <http://turtletracks@earthlink.net> <http://turtletracks@earthlink.net> " <turtletracks@earthlink.net <http://turtletracks@earthlink.net> <http://turtletracks@earthlink.net> <http://turtletracks@earthlink.net> >
Date: Thu, 26 Aug 2021 17:36:37 -0700
To: <Stephanie.escobar@lacity.org <http://Stephanie.escobar@lacity.org> <http://Stephanie.escobar@lacity.org> <http://Stephanie.escobar@lacity.org> >
[Quoted text hidden]

Stephanie Escobar <stephanie.escobar@lacity.org> Tue, Sep 7, 2021 at 1:51 PM
To: "turtletracks@earthlink.net" <turtletracks@earthlink.net>

Hello,

No seismic assessment was provided as the project is not located in any special fault zone.
[Quoted text hidden]
[Quoted text hidden]

Stephanie Escobar <stephanie.escobar@lacity.org> Tue, Sep 7, 2021 at 1:54 PM
To: "turtletracks@earthlink.net" <turtletracks@earthlink.net>

Please let me know if you have any other questions.

[Quoted text hidden]

Connect Create Collaborate

Oliver Netburn <oliver.netburn@lacity.org>

Fwd: 1251 W Sunset Blvd- DIR-2018-6634-TOC

1 message

Joann Lim <joann.lim@lacity.org> Tue, Oct 22, 2019 at 12:01 PM
To: Oliver Netburn <oliver.netburn@lacity.org>

---------- Forwarded message ---------
From: **Andy Simhaee** <andy.simhaee@gmail.com>
Date: Tue, Oct 22, 2019 at 10:40 AM
Subject: 1251 W Sunset Blvd- DIR-2018-6634-TOC
To: Joann Lim <joann.lim@lacity.org>, Daniel Rafalien <brafalian@yahoo.com>, Michael Aminpour <michaela@bkcfm.com>, Farzin Maly <farzin.maly@gmail.com>

Hi Joan
Just checking the status of this project

SEI

1332 S st. Joseph Pl

Los Angeles, CA, 90015

Tel: (213)747-2560

Fax: (213)749-1035

Email: andy.simhaee@gmail.com

--

Joann Lim
City Planning Associate
Los Angeles City Planning
200 N. Spring St., Room 763
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1341 | F: (213) 978-4656

Connect Create Collaborate

Oliver Netburn <oliver.netburn@lacity.org>

Re: DIR-2018-6634-TOC

Joann Lim <joann.lim@lacity.org> Tue, Sep 3, 2019 at 1:47 PM
To: Andy Simhaee <andy.simhaee@gmail.com>
Cc: Oliver Netburn <oliver.netburn@lacity.org>

Hello Andy,

Any updates on the demolition permit?

Best,
Joann

On Thu, Aug 22, 2019 at 4:05 PM Andy Simhaee <andy.simhaee@gmail.com> wrote:

> Hi Joann
> Let me check on that
> I let you know
>
> SEI
>
> 1332 S st. Joseph Pl
>
> Los Angeles, CA, 90015
>
> Tel: (213)747-2560
>
> Fax: (213)749-1035
>
> Email: andy.simhaee@gmail.com
>
> On Thu, Aug 22, 2019 at 3:44 PM Joann Lim <joann.lim@lacity.org> wrote:
>
> > Hello Andy,
> >
> > The expedite intake form shows that a Historic Resource Assessment was required. However it looks like there were discussions between you and Oliver about a demolition permit being issued. Do you have a copy of the issued demolition permit?
> >
> > Best,
> > Joann
> >
> > On Thu, Aug 22, 2019 at 11:18 AM Andy Simhaee <andy.simhaee@gmail.com> wrote:
> >
> > > Hi Joann
> > > Sorry I am not clear for this email?
> > > Is it possible to give me more information?
> > >
> > > All the Best
> > >
> > > Andy Simhaee
> > >
> > > SEI
> > >
> > > 1332 S st. Joseph Pl
> > >
> > > Los Angeles, CA, 90015
> > >
> > > Tel: (213)747-2560

Fax: (213)749-1035

Email: andy.simhaee@gmail.com

On Thu, Aug 22, 2019 at 11:06 AM Joann Lim <joann.lim@lacity.org> wrote:

> Good Afternoon Andy,
>
> I received comments back from my supervisor. We are pending a historic resources assessment and communication from the OHR stating that they have reviewed the project.
>
> Best,
> Joann
>
> --
>
> **Joann Lim, City Planning Associate**
> **Department of City Planning**
> **T:** (213) 978-1341
> 200 North Spring Street, Room 763
> Los Angeles, CA 90012

--

Joann Lim, City Planning Associate
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--

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Los Angeles, CA 90012

INITIAL SUBMISSIONS

The following submissions by the public are in compliance with the Commission Rules and Operating Procedures (ROPs), Rule 4.3a. The Commission's ROPs can be accessed at **http://planning.lacity.org**, by selecting "Commissions, Boards & Hearings" and selecting the specific Commission.

The following submissions are not integrated or addressed in the Staff Report but have been distributed to the Commission.

Material which does not comply with the submission rules is not distributed to the Commission.

ENABLE BOOKMARKS ONLINE:

**If you are using Explorer, you will need to enable the Acrobat toolbar to see the bookmarks on the left side of the screen.

If you are using Chrome, the bookmarks are on the upper right-side of the screen. If you do not want to use the bookmarks, simply scroll through the file.

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

STIRES STAIRCASE BUNGALOW COURT & ANGELINO HEIGHTS

Dear City Planning Commissioners:

Angelino Heights was the city's very first suburb (McMillan, 1989). It was a neighborhood inhabited by longtime preservationists who worked tirelessly at creating a safe haven for older structures threatened with the wrecking ball. It is also the neighborhood where several homes were moved to (Mothner, 1994). Angelino Heights became the first Los Angeles neighborhood to receive the designation of Historic Preservation Overlay Zone (HPOZ). One of Angelino Heights' character defining features are its **Mission Revival** style structures (McMillan, 1989); such as the Stires Staircase Bungalow Courts.

This neighborhood has been specifically referenced as "a living museum because its array of architectural styles mirrors the city's growth, having a feeling from a different place and time. A feeling to be preserved." (Schnapper, 1982). Angelino Heights residents quickly secured a reputation as having "unusual control over their neighborhood" (McMillan, 1989). A Committee established by neighbors advised builders to walk around the Angelino Heights neighborhood in order for them to understand what would be considered an acceptable and appropriate contribution to their community. The committee did not permit the demolition of "vintage houses" (McMillan, 1989). Protection for this neighborhood where the Stires property sits was so strict, the city used to require the builder obtain a "Certificate of Approval" from the planning commission, who always took the recommendation of the neighborhood committee. Builders who failed to comply with neighborhood character requirements were prosecuted. All of the preservation work done over these years by the neighborhood residents resulted in home values that quadrupled within a decades time (McMillan, 1989). (Mothner, 1994)

Most developers are ignorant as to a neighborhood's historic relevance. This is usually because they are not from here, don't live here, nor have they ever taken an appreciation for our history and culture. Most importantly, they choose to NOT walk around the area, which used to be a requirement for anyone wanting to build in Angelino Heights (McMillan, 1989). Not doing so sends a message to the community that they could care less about the mess they are dropping in our neighborhood, that **we** are stuck with once they go back to their own homes, outside the state of California. Their carelessness is what puts neighborhoods like this at the risk of extinction. This Commission is what enables the behavior, when the general plan and specific plan go ignored, as proposals are approved.

In the 1990's, the LA Times reported a housing crisis existed (Stewart, 1990, Clifford, 1991, Uttal, 1991, LAT, 1992, Martinez, 1992). Yet preservation efforts were supported by local governing bodies and under no circumstances were neighborhoods like these ever considered for destruction. In fact, the city was working on strengthening the laws on preservation during the housing crisis (Corwin, 1991). There is a way to address both issues, again, according to the

needs of the neighborhoods as the city's general plan denotes (as seen in multiple locations in the appeal filed and in other comment letters filed in support the Courtney appeal).

The homeowner who filed the appeal to this case lives in a Historic Cultural Monument. There are sections of this neighborhood that remain part of the original erection of this neighborhood that still have a chance at being preserved. The existing HPOZ can be re-zoned.

Attached to this letter are the newspaper articles referenced herein, that serve as evidence in the record demonstrating the Stires staircase bungalow property is part of the neighborhoods iconic history, and should be acknowledged as such.

• NEIGHBORHOOD CHARACTER •

Neighborhood character an amalgam of various elements that give a neighborhood its distinct "personality." This is a neighborhood where walking tours have taken place for decades, due to its victorian and craftsman style buildings. There is a reason the Cultural Heritage Commission found the tSires Bungalows met ALL 3 criteria of the city's Cultural Heritage Ordinance. This is incredibly rare. Not only are these bungalows eligible for state and national registry of historic places, but the neighborhood ,ay be eligible for an HPOZ. This project kills that possibility for the entire neighborhood.

The CPC should not be forcing our neighborhoods to accommodate singular, lifeless projects. The city's general plan elements require decision makers to ensure our neighborhoods are not piece-mealed together, and to ensure harmonious design and visually appropriate projects, and require they are **appropriate** for their proposed location. This has not happened here. There is not one property in this neighborhood resembling the renderings of the proposed. This should demonstrate to the commission that this applicant is in the wrong place.

Project applicants should know better than to purchase these properties thinking they can change the entire landscape of our neighborhoods. Had they reached out first, had they met with the community, they would have learned from the very start, that their ideas for our neighborhood are not well taken. They were first informed of this in 2019 when the Echo Park Neighborhood Council rejected their project on a variety of grounds, one of which was insufficient outreach including to current residents (EPNC, 2019).

If the Commission has not viewed the applicant's renderings, please do. This site is NOT the appropriate neighborhood for the project the applicant wants to build. It is clear the DCP has made a serious error by not considering the neighborhood's existing communities, its structures and its historically significant past and this property's role in reflecting that. I believe it was Councilmember Herb Wesson who said: "*It's not enough just to build. We need to build housing that working people can afford*" (Wesson, 2020). It's not enough that a developer comes to you wanting to build. The "build" has to be in response <u>to what the location actually needs</u>. What the residents need. And again, as the evidence has demonstrated, this is far from it.

This commission, like the city, continues to talk about the city's housing crisis, as if market rate housing is the solution to an entirely different issue - homelessness. Nevertheless, what the city and this commission fail to do is discuss what specific neighborhoods are in dire need of housing. In addition to the city's own general plan elements, specifically the housing element, show this specific neighborhood **has decreased in population**. Further, as the Echo Park Neighborhood Council has stated more than once: *"The job of the DCP is to approve or deny these proposals **based on the needs of the specific community according to the general and specific plan**. This project does not comport with the needs of this community, and your continued approval ignores the valid and important objections from the many stakeholders who have spoken out against this project."* This shall serve as even **additional** evidence, that the DCP has erroneously issued approvals for a project that is exceedingly out of place, out of scale, and out of its mind. Smart planning includes familiarizing yourselves with the neighborhoods our city is made of. This cant be done from behind a desk.

This proposal fails to address any of the communities issues while actually claiming to solve the cities "housing crisis", by building 64 **market rate** units in a neighborhood that has no shortage of market rate units. This is an abuse of discretion used as a distraction for the real issues that exist in our neighborhood, which no one chooses to address. This project is a no on every level.

-LA native, voter, tax payer & resident of Echo Park for 35 years.

REFERENCES

Corwin, Miles (1991). *City to Consider Tougher Law on Historic Structures.* Los Angeles Times ProQuest Historical Newspapers, pg. A1

Clifford, Frank (1991). *Housing Space in L.A. Running Out, Report Says.* Los Angeles Times ProQuest Historical Newspapers, pg. VYA1

EPNC (Echo Park Neighborhood Council) (February 26, 2019). *Letter of Opposition for DIR-2018-6634-TOC 1251 W. Sunset Blvd*

McMillan, Penelope (1989). *Guardians of Heritage Think Old: Panel Members Control Styles to Preserve 1880s Design of Neighborhood.* Los Angeles Times; ProQuest Historical Newspapers, pg. 56

Mothner, Linda Beth (1994) *Urban Living in a Slice of L.A. History.* Los Angeles Times ProQuest Historical Newspapers, pg. K2.

Schnapper, Amy (1982). *Proud Neighbors Seek to Preserve Living Past.* Los Angeles Times ProQuest Historical Newspapers, pg. H1

Sneiderman, Phil (1991). *Panel to Weigh Streamlining Design Reviews: Preservation: Angelino Heights group wants to speed up projects*. Los Angeles Times ProQuest Historical Newspapers, pg. GDJ1

Stewart, Jill (1990). *L.A. Awakening to Low-Cost Housing Crisis.* Los Angeles Times; ProQuest Historical Newspapers, pg. B1

Uttal, Irving L (1991). *Reasons for the Shortage of Affordable Housing.* Los Angeles Times ProQuest Historical Newspapers, pg. WSJ5

CPC 2022

CITY PLANNING COMMISSION - AGENDAS 2022

Samantha Millman, President
Caroline Choe, Vice President
Helen Campbell, Commissioner
Jenna Hornstock, Commissioner
Helen Leung, Commissioner
Yvette López-Ledesma, Commissioner
Karen Mack, Commissioner
Dana Perlman, Commissioner
Renee Dake Wilson, Commissioner

DATE	CASE#	REQUEST	FOUND CEQA EXEMPT ?	APPEALED	RESULT	CD
Jan 2022	CPC-2021-4280-GPA-ZC-BL ENV-2021-4281-ND	Demolish existing parking lot for new 3-story, 56-ft high office building with 30,385 sf FAR & 83 parking spaces, + Zone change, + Lot Line Removal	Yes	No	Project Approved	13
Jan 2022	CPC-2021-2035-DB-CU-CUB-SPR-HCA CEQA: ENV-2021-2036-CE	Demolish existing 1-and 2-story auto shop & parking lot for new 7-story, 84,662 sf, mixed-use residential development with 86 residential units (10 units VLI), & 69 parking spaces, + Density Bonus, + 100% decrease in residential parking, + 100% decrease in commercial parking, + reduced open space, + reduced setbacks, + height increase, + increase in FAR	Yes	No	Project Approved	13
Jan 2022	CPC-2021-3038-DB-SPR-HCA ENV-2021-3039-CE	Demolish “site improvements” for new, 15-story, 13-level, 195-ft, 243,973 sf mixed-use building with 331 dwelling units (37 VLI), 31 commercial parking spaces totaling 6,350 sf, + Density Bonus, + Increase in FAR, + Height Increase, + Eliminated parking requirements	Yes	No	Project Approved	14
Jan 2022	DIR-2021-2250-TOC-HCA-1A ENV-2021-2251-CE	Demolish 2 existing single-family dwellings & office building for 6-story, 67-ft high, 40-unit residential building (4 units ELI), with 61,106 sf of floor area, resulting in a FAR of 3.79 to 1 & 50 parking spaces, + 30% reduced setbacks, 25% reduced open space, + reduction in parking spaces, + increase in FAR, + 22 ft additional height	Yes	Yes	Appeal Denied, Project Approved	13
Jan 2022	DIR-2020-1824-TOC-HCA-1A ENV-2020-1825-CE	Demolish existing single-family residence for new 5-story, 63-ft 3” high, 14-unit (2-units VLI) apartment building with 11,348 sf, 11 parking spaces, + grading of approx 2,327 cubic yards of soil & approx 1,347 cubic yards of soil for export, + Density Bonus, + Increase in FAR, + Height Increase, + Reduced Setbacks, + Reduced Open Space	Yes	Yes	Appeal Denied, Project Approved	11
Jan 2022	CPC-2019-4983-GPA-VZC ENV-2019-4984-ND	Change of use from a school, daycare, convent, dormitories, playground, & chapel to storage, office & motion picture/TV use, + General Plan Amendment, + Vesting Zone Change, + *potential* development of 10,000 sf of office use	Yes	No	Project Approved	1

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Dana Perlman, Commissioner
Renee Dake Wilson, Commissioner

DATE	CASE#	REQUEST	FOUND CEQA EXEMPT ?	APPEALED	RESULT	CD
Jan 2022	CPC-2020-4011-GPAJ-ZCJ-HD-SPR-HCA ENV-2020-4012-MND	Interior renovations + 78-ft high, 30,000 sf addition to the former Shriner's Children's Hospital complex, resulting in 169,000 st development, approx 139,000 sf of outpatient medical clinic and medical office uses and approx 30,000 sf of 40 Senior Independent Living residential units (2 ELI, 3 VLI). 150 parking spaces, + General Plan Amendment, + Zone change, + Height Increase, + reduction in parking, + waiver of height limits	Yes	No	Project Approved	13
Jan 2022	CPC-2020-5994-DB-SPR-VHCA ENV-2020-5995-SCPE	Demolish 4 existing commercial buildings for 56-ft high, 80,480 sf mixed-use building with 92 dwelling units (11 VLI), & 125 parking spaces, + Reduction in Open Space, + Increase in FAR, + Height increase, + Reduced setbacks	Yes	No	Project Approved	5
Jan 2022	VTT-83288-1A ENV-2020-6829-MND	Subdivide 5 parcels into 8 lots + 7 airspace lots for 14-story, 188,954 sf, commercial office building with 397 parking spaces & 5 levels of above grade parking	Yes	Yes	Appeal Denied, Project Approved	14
Jan 2022	CPC-2020-6828-GPA-ZC-HD-SPR-MCUP ENV-2020-6829-MND	Construction of a 188,954 sf,14-story, commercial office building with 4,325 sf of commercial ground floor, & 397 parking spaces, 5 levels of above grade parking, and 2 levels of subterranean parking, + General Plan amendment, + Height increase	Yes	No	Project Approved	14
Feb 2022	CPC-2018-6693-GPA-SP-SPP ENV-2000-3577-EIR-ADD8 SCH No. 2000091046	Demolish existing structure for Hotel and Conference Center Expansion Project; construction a 37-story hotel tower with 861 guest rooms, 9,900 sf of retail, 5-story podium with a 228,200 sf conference center, parking, & new signage, up to 2 new pedestrian bridges, & alcohol & signage approvals, + Amendment to Specific Plan, + Amendment to General Plan,	Yes	No	Project Approved	9, 14
Feb 2022	ZA-2009-3289-PAB-PA1 ENV-2000-3577-EIR-ADD8 SCH No. 2000091046	“	Yes	No	Project Approved	9

CITY PLANNING COMMISSION - AGENDAS 2022

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Renee Dake Wilson, Commissioner

DATE	CASE#	REQUEST	FOUND CEQA EXEMPT ?	APPEALED	RESULT	CD
Feb 2022	VTT-80315-1A ENV-2018-177-EIR SCH No. 201805104	Merger and re-subdivision of an approx 6-acre site into one master lot & 17 airspace lots, & Haul Route for export of 472,000 cubic yards of soil	CERTIFIED EIR	Yes	Appeal Denied, Project Approved	1
Feb 2022	CPC-2018-176-DB-BL-VCU-CU-MCUP-DD-SPR ENV-2018-177-EIR SCH No. 201805104	Demolish 4 existing buildings for 1,019,034 sf new floor area on an approx 6.19 acre site, mixed use development. 1. Mixed-Use Development Scenario: Up to 737 residential units (*up to* 76 VLI), 180 hotel guest rooms, 48,000 sf of office & 95,000 sf of general commercial floor area. 2. No-Hotel Development Scenario: Up to 827 residential units (*up to* 76 VLI Units), 48,000 sf of office & 95,000 sf of general commercial floor area, + Density Bonus, + Increase in FAR, + Zero separation between buildings, + reduction in trees	“	No	Project Approved	1
Feb 2022	DIR-2020-1006-TOC-HCA-1A ENV-2020-1007-CE	Demolish existing 2-story triplex for a 14,449 sf, 4-story, 56-ft high mixed-use building with 27 dwelling units (2 units VLI, 1 unit ELI) over 210 sf of ground floor commercial space, 1.9 to 1 FAR & 24 parking spaces, 0-ft front yard, 5-ft side yards, and a 0-ft yard rear yard, + Height Increase, reduced setbacks	Yes	Yes	Appeal Denied, Project Approved	13
Mar 2022	DIR-2020-3912-TOC-CCMP -VHCA-1A ENV-2020-3913-CE	Demolish existing parking lot for new 3-story, 3-ft, 6” high, 33 multi-family dwelling units building with 1,910 sf of commercial floor area in a over two levels of subterranean parking, totaling 59,029 sf, + Density Increase, + FAR Increase, + Reduced parking	Yes	Yes	(cont..)	14
Mar 2022	CPC-2021-7217-DB ENV-2021-7218-CE	New 4-to-6-story, 67-ft high, 61,899 sf mixed-use building with 63 units (6 units VLI),101 parking spaces + Density Bonus, + Height Increase, + FAR Increase, + reduced setbacks	Yes	No	Project Approved	5
Mar 2022	CPC-2017-1923-DB-DRB-SPP-MSP-ZAD ENV-2017-1925-MND	Demolish two existing single-family dwellings & garage for new, 5-story, 68 ft high, 35,227 sf, 21-unit residential condominiums (2 “affordable” units) on a 22,508 sf lot, the **removal of 15 existing trees**, haul route export of approx 11,200 cubic yards of earth	Yes	No	Project Approved	4

CITY PLANNING COMMISSION - AGENDAS 2022

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Helen Leung, Commissioner
Yvette López-Ledesma, Commissioner
Karen Mack, Commissioner
Dana Perlman, Commissioner
Renee Dake Wilson, Commissioner

DATE	CASE#	REQUEST	FOUND CEQA EXEMPT ?	APPEALED	RESULT	CD
Mar 2022	CPC-2020-2115-DB ENV-2020-2116-CE	Demolish existing single-family residence with a 7 story, 33-unit apartment building (3 units VLI), + Density Bonus + FAR Increase, + Reduced setbacks to ZERO, + landscape buffer reduction to ZERO	Yes	Yes	Appeal Denied, Project Approved	10
Mar 2022	CPC-2021-6888-CU-DB-HCA-PHP ENV-2021-6889-CE	Demolish existing single-family dwelling and duplex for new 5-story, 56-ft high, multifamily residential building comprised of 27 dwelling units (5 VLI units), 19 parking spaces, + **removal of 3 existing trees**, & haul route for export of approx 2,650 cubic yards of soil, + Increase in Density, + Reduced Setbacks, + Height Increase, + Reduced Open Space	Yes	No	Project Approved	5
Mar 2022	DIR-2021-559-TOC-HCA-1A ENV-2021-560-CE	Demolish all existing structures for new 26,648 sf, 5-story, 56-ft high residential building with 21 dwelling units (2 units ELI), 2.38 to 1 FAR, & 21 parking spaces, + Height Increase, + Reduced Open Space	Yes	Yes	Appeal Denied, Project Approved	4
Apr 2022	VTT-83142-1A CEQA: ENV-2020-6951-MND	Merger of a public alley and the re-subdivision of a 0.62-acre site containing eleven existing lots into one master ground lot and the dedication of a replacement alley.	Yes	Yes	Appeal Denied, Project Approved	2
Apr 2022	CPC-2020-6950-GPA-VZC-HD-ZAA-CU-CUB-SPR CEQA: ENV-2020-6951-MND	Demolish existing 1-story commercial buildings & parking lots for new 7-story, 88-ft high mixed use building with 158 hotel guest rooms and 8,900 sf of restaurant & retail, encompassing approx 108,841 sf on a 0.62-acre site & 85 parking spaces, + General Plan Amendment, + Zone Change, + Height Increase, + Density Increase	Yes	No	Project Approved	2
Apr 2022	DIR-2018-6634-TOC-1A ENV-2018-6635-CE	Demolish 10 existing RSO units for new 7-story, 70-unit residential development with 7 “affordable” units (7 ELI), a total of 55,000 sf of floor area, 2.75 to 1 FAR & 38 parking spaces	Yes	Yes	Cont.	1

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DATE	CASE#	REQUEST	FOUND CEQA EXEMPT ?	APPEALED	RESULT	CD
Apr 2022	DIR-2021-6289-TOC-HCA-1A ENV-2021-6290-CE	Demolish 3 existing duplexes for 6-story, 67-ft high, 22-unit residential building (2 units ELI, 2 units VLI, 1 unit LI) with 23,866 sf feet of floor area, resulting in a FAR of 3.63 to 1 & 11 parking spaces, + Density Increase, + FAR Increase, Height Increase, + Reduced parking, + Reduced Setbacks, + Reduced Open Space	Yes	Yes	Appeal Denied, Project Approved	10
Apr 2022	DIR-2020-3912-TOC-CCMP-VHCA-1A ENV-2020-3913-CE	Demolish existing parking lot for new 3-story, 3-ft, 6” high, 33 multi-family dwelling units building with 1,910 sf of commercial floor area in a over two levels of subterranean parking, totaling 59,029 sf, + Density Increase, + FAR Increase, + Reduced parking	Yes	Yes	Appeal Denied, Project Approved	14
Apr 2022	ZA-2021-9890-ZV-1A ENV-2017-4735-MND	Use and maintenance of a 42-room apartment hotel in the M2-2D Zone, + Zone Variance	Yes	Yes	Appeal Denied, Project Approved	14
May 2022	CPC-2020-1619-ZC-HD-CUB-ZV-WDI ENV-2020-1620-ND	Adaptive reuse of existing 4-story historic Palmer office building into a new 57-room boutique hotel with restaurant, bar, & rooftop pool deck, 800 sf addition to roof, + Zone Change, + Zone Variance	Yes			13
May 2022	CPC-2021-1557-DB-SPR-HCA ENV-2021-1558-CE	Demolish existing structures for new 7-story mixed-use development with 109 dwelling units; 14,657 sf of ground floor commercial uses &196 parking spaces, + Density Bonus, + FAR Increase, + Reduced Open Space	Yes	No	Project Approved	13
May 2022	CPC-2021-2221-CU-SPP ENV-2021-2223-CE	Convert existing 2,891 sf, 6-bed Congregate Living Health Facility (CLHF) into a 12-bed facility in the RD2-1 Zone, + Reduced parking, + demolition of existing laundry room	Yes	No	Project Approved	7
May 2022	VTT-83550-CN-1A ENV-2021-6879-SCEA	Subdivision 153,608 sf lot into one ground lot & 4 airspace lots, with 1 airspace lot with 260 residential condominium units, + waiver of the required 2 ft dedication for sidewalk widening, + Haul Route for export of approx 170,000 cubic yards of soil	Yes	Yes	Appeal Denied, Project Approved	10

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DATE	CASE#	REQUEST	FOUND CEQA EXEMPT ?	APPEALED	RESULT	CD
May 2022	CPC-2021-6877-DB-SPR-CUB ENV-2021-6879-SCEA	New 460,824 sf mixed-use, one 230,412 sf residential bldng with 260 dwelling units (22 units for VLI, 7 units workforce) 149-ft 6-inches high, up to13 stories high on 3.53 acres site. One 230,412 sf Commercial bldng up to 6 stories high with 785 parking spaces, + SCPE, + Density Bonus, + Height Increase, + reduction in parking, + CUP for alcohol	Yes	Yes	Project Approved	10
May 2022	CPC-2021-4259-CU-CUB-SPR ENV-2021-4260-MND	General Plan Amendment to amend the Northeast Los Angeles Community Plan to re-designate the subject properties from Low Medium II Residential General Plan Land Use to Neighborhood Commercial General Plan Land Use, + Zone Change, + Conditional Use Permit, + Site Plan Review	CERTIFIED EIR	No	Project Approved	14
Jun 2022	CPC-2020-4127-CU-ZV-F ENV-2020-4128-CE	Change of use to a private school for within 5 existing buildings totaling approx 18,127 sf & a max of 360 students & 26 parking spaces, + CUP, + Fence height increase, + Zone Variance	Yes	No	Project Approved	2
Jun 2022	CPC-2021-9031-VZC-CU-SPR ENV-2021-9032-MND	Convert & expand existing 2-story commercial office bldng, + new 3-story bldng for storage for approx. 97,000 sf of area, + parking lot, + 23 parking spaces, + Zone Change, + CUP, + Height increase for fence, + reduction in parking, + Site Plan Review for increase in gsf	Yes	No	Project Approved	3
Jun 2022	DIR-2021-7095-TOC-HCA-1A ENV-2021-7096-CE	Demolish existing “site improvements” for new 6-story, 57,829 sf mixed-use bldng with 54 dwelling units (6 units ELI) & 59 parking spaces. 3,374 sf of commercial space, two levels of subterranean parking with 18 parking spaces, + Density Bonus, + Reduced Setbacks, + Height Increase + Reduction in Open Space	Yes	Yes	Not Available	4
Jun 2022	CPC-2020-2115-DB ENV-2020-2116-CE	Demolish existing single-family residence with 7-story, 33-unit apartment building (3 units VLI), + Increase in FAR, + Height Increase, + Zero setbacks, + Reduced Open Space, + Buffer Reduction	Yes	No	Not Available	10

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DATE	CASE#	REQUEST	FOUND CEQA EXEMPT ?	APPEALED	RESULT	CD
Jun 2022	VTT-74865-1A ENV-2017-468-EIR SCH No. 2020010172	Not Available		Yes	Not Available	5
Jun 2022	CPC-2017-467-GPA-VZC-HD-SPR ENV-2017-468-EIR SCH No. 2020010172	Not Available			Not Available	5
Jun 2022	VTT-83510-CN-HCA-1A ENV-2021-6887-CE	Not Available		Yes	Not Available	13
Jun 2022	CPC-2021-6886-DB-SPR-WDI-HCA ENV-2021-6887-CE	Not Available			Not Available	13

CPC 2021

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DATE	CASE#	REQUEST	FOUND CEQA EXEMPT ?	APPEALED	RESULT	CD
Jan 2021	CPC-2019-7320-VZC-HD-CU-SPR-RDP ENV-2019-7321-MND	Demolish existing one-story, 4,300 sf building & surface parking lot for 138,035 sf mixed use 124,371 sf building, self-storage & 13,664 sf office suites	Yes	No	Project Approved	2
	CPC-2019-6854-GPA-ZC-HD ENV-2019-6855-MND	Demolish existing single-family dwelling & accessory structures for 2-story, 43-ft 8" high, 13,135 sf mixed-use (8 dwellings)	Yes	No	Project Approved	7
Jan 2021	DIR-2019-2789-TOC-1A ENV-2019-2790-CE	Demolish existing parking lot for 7-story, 75-ft high building with 31 residential units (4 units ELI), 25,693 sf of floor area, with max FAR of 3.89:1, & grading of approx 3,000 cubic yards of soil	Yes	Yes	Appeal Denied, Project Approved	5
Jan 2021	VTT-82654-1A ENV-2019-3761-SCPE DIR-2019-3760-TOC-SPP-SPR-1A	Demolish 3 existing multifamily buildings & accessory buildings for 8-story, 153 dwelling unit apartment building with 143,785 sf FAR	Yes	Yes	Appeal Denied, Project Approved	13
Jan 2021	CPC-2020-1716-GPA-ZC-HD ENV-2020-1717-CE	Amend General Plan to change zones to permit the conversion of 139 guest rooms to light housekeeping rooms	Yes	No	Project Approved	10
Jan 2021	DIR-2020-4062-TOC-HCA-1A ENV-2020-4063-CE	Demolish 3 existing residential structures for 6-story, 61-ft 8" high 36,838 sf residential building with 30 dwelling units (3 ELI units) & 52 parking spaces	Yes	Yes	Appeal Denied, Project Approved	10
Feb 2021	CPC-2020-1723-CU-DB-HCA ENV- 2020-1724-CE	Demolish existing 3-unit multi-family residence & accessory structures for 5-story, 56-ft high, multi-family residential building with 22 units (4 VLI) & 30 parking spaces	Yes	No	Project Approved	10
Feb 2021	CPC-2019-6799-CU-WDI ENV-2020-6800-CE	Convert existing two-story, 8,225 sf office/warehouse into a private school	Yes	No	Project Approved	11
Feb 2021	CPC-2020-0595-DB-CU ENV-2020-0597-CE	Demolish existing duplex for 6-story, 67-ft high, 16,388 sf, 13-unit apartment building (2 units VLI) & 22 parking spaces	Yes	No	Project Approved	5
Feb 2021	CPC-2007-3888-CU-ZV-SPR-PA1-1A, ENV-2020-2426-CE	Modify conditions related to improvements associated with Peoria Street and Tujunga Avenue which will no longer be relevant once those portions of the street are vacated	Yes	Yes	Appeal Denied, Project Approved	6

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Feb 2021	DIR-2019-4821-TOC-1A ENV-2019-4822-CE	Demolish existing one-story commercial building for four-story mixed-use building with 34 market rate apartment units (4 units ELI) over three levels of subterranean parking	Yes	No	Project Approved	5
Mar 2021	CPC-2019-5778-DB-DRB-SPP ENV-2019-5779-CE	Demolish 2 existing one-story commercial buildings for six-story, 70-ft mixed use building with 51,444 sf of floor area with 64 dwelling units (6 units VLI) 5,000 sf of commercial space & 45 parking spaces	Yes	No	Project Approved	8
Mar 2021	CPC-2020-4418-CU-F ENV-2020-4419-CE	Demolish existing single-family dwelling & accessory structures, for two-story, approx 23,157 sf building, with a max height of 24-ft 3” for public charter middle school campus with max enrollment of 330 students grades 6 - 8	Yes	No	Project Approved	2
Mar 2021	DIR-2020-3348-TOC-SPR-HCA-1A ENV-2020-3349-CE	Demolish existing structures for seven-story, 62-unit residential-commercial building (5 units ELI), 6,452 sf of ground floor commercial floor area, approx 57,241sf of floor area, resulting in a FAR of 2.75 to 1, & max height of 97-ft 6” & 82 parking spaces	Yes	Yes	Appeal Denied, Project Approved	4
Mar 2021	DIR-2018-4817-TOC-1A ENV-2018-4818-CE	Demolish existing structures & street trees for five-story, 56-ft high, multi-family residential building with 14 dwelling units, (2 ELI units) & 13,353 sf of floor area with a FAR of 3.35 & 11 parking spaces	Yes	No	Project Approved	4
Mar 2021	CPC-2020-4714-CU-DB-SPR-RDP-HCA, ENV-2020-4715-CE	Demolish two existing restaurants & one industrial building for seven-story, 212,371 sf mixed-use building with 157 dwelling units and 5,128 sf commercial tenant space (18 VLI units)	Yes	No	Project Approved	9
Apr 2021	VTT-74890-CN-1A ENV-2017-438-EIR	Demolish 353 residential & eight commercial condominiums for merger of 16 lots for 347 new live-work units, approx 187,374 sf of new office space, 21,858 sf of new commercial uses & 926 sf ground floor community room, including six levels of subterranean parking	Yes	Yes	Appeal Denied, Project Approved	14

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Apr 2021	DIR-2020-2067-TOC-1A ENV-2020-2068-CE	Demolish existing single-family residence for 5-story, 20 dwelling units (2 ELI units) 20,093 sf multi-family residential building over one level of subterranean parking with 24 parking spaces	Yes	Yes	Appeal Denied, Project Approved	10
Apr 2021	CPC-2020-6192-GPAJ-VZCJ-HD-CU-MCUP-SPR-HCA ENV-2018-3986-SCEA-REC1	Demolish all existing buildings for 40-story, 483-ft high, 440,442 sf floor area with 367 residential dwelling units (6 % VLI, 5% ELI) & conversion of 19,972 sf church to restaurant use	ELDP ("no effect")	No	Project Approved (first vote not unanimous)	13
Apr 2021	DIR-2020-1870-TOC-HCA-1A ENV-2020-1871-CE	5-story plus loft level, 57-ft high residential building with 58 units (6 units ELI) on vacant site under TOC & 105 parking spaces	Yes	Yes	Appeal Denied, Project Approved	10
May 2021	CPC-2020-0946-DB-MCUP-HCA ENV-2020-0947-CE	Redevelop existing single-story for 7-story, 89-ft high mixed use building with 9,440 sf of ground floor restaurant & retail space with 64 dwelling units (8 VLI units) & 55 parking spaces	Yes	No	Project Approved	5
May 2021	CPC-2017-3251-TDR-MCUP-SPR ENV-2016-4630-EIR	Demolish 5 existing single-story buildings with 35,651 sf of floor area for 70-story, 810 ft high-rise with a 61-story tower above a nine-level podium, 751,777 sf of floor area on a 38,097 sf site with 794 residential market rate units & 12,504 sf of retail	ELDP ("no effect")	No	Project Approved	14
May 2021	DIR-2020-6265-TOC-SPR-VHCA ENV-2020-6266-SCEA	Demolish existing commercial & 5 existing RSO units residential structures for 7-story, 79-ft high, 160,425 sf, 176-unit residential project (18 units ELI) with 203 parking spaces	SCEA ("no effect")	No	Project Approved	13
May 2021	VTT-82618-CN-1A ENV-2019-1736-SCPE ZA-2019-1744-CU-MCUP-SPR-TOC-1A	Demolish existing commercial buildings for 8-story, 201,123 sf mixed-use building with 121 residential dwelling units (18 units ELI, 1 unit MI), 125 hotel guest rooms, 13,037 sf of commercial space & 185 parking spaces	Yes	Yes	Appeal Denied, Project Approved	4

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DATE	CASE#	REQUEST	FOUND CEQA EXEMPT ?	APPEALED	RESULT	CD
May 2021	CPC-2020-4566-DB-HCA ENV-2020-4567-CE	Demolish 4 existing RSO units residential building for five-story, 54-ft high, 21,695 sf residential building on 9,735 sf lot with 18 residential units (1 LI unit & 2 VLI units) & 16 parking spaces with zone change & waivers	Yes	No	Project Approved	2
May 2021	CPC-2018-3003-GPA-ZC-HD-SPP ENV-2018-3004-MND	Two-story, 25-ft high building with 6,006 sf of floor area over a 1,430 sf subterranean basement comprised of six general office spaces, one medical office space, one coffee shop & 12 parking spaces on vacant 10,797 sf site, + General Plan amendment to change zone	Yes	No	Project Approved	7
May 2021	CPC-2020-251-GPA-ZC-HD ENV-2020-252-ND	Demolish existing two-story 21,000 sf specialty medical hospital & surface parking lot for five-story, 81-ft high specialty medical hospital & surface parking lot with 40 parking spaces + zone change & height change	Yes	No	Project Approved	10
May 2021	VTT-82288-1A ENV-2018-6667-SE CPC-2018-7344-GPAJ-VZCJ-HD-SP-SPP-CDP-MEL-SPR-PHP	Demolish existing surface 196 space parking lot & 3 existing RSO units in a two-story four-unit residential structure for merger and re-subdivision of existing 115,674 sf site for seven airspace lots, with max of 140 dwelling units, 685 sf supportive uses, 2,255 sf retail uses, an 810 sf restaurant with 1,060 sf outdoor & indoor Service Floor area, 2,875 sf of art studio use	Yes	Yes	Appeal Denied, Project Approved	11
Jun 2021	CPC-2020-5508-DB-CU-HCA ENV-2020-5509-CE	Demolish existing single-family home & 4 existing RSO units in triplex for 22,063 sf seven-story, residential 27 condominium units (7 units VLI) &14 parking spaces	Yes	No	Project Approved	11
Jun 2021	DIR-2020-5861-TOC-DRB-SPP-HCA-1A ENV-2020-5862-CE	Demolish 8 existing RSO units in apartment building, garages, all other on-site structures & existing tree for six-story, 64-ft 8" high, 18,732 sf apartment building with 18 units (1 unit ELI & 2 units VLI), two levels of subterranean parking with 16 spaces + reduction in open space + setback reductions	Yes	Yes	Appeal Denied, Project Approved	5

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Jun 2021	DIR-2020-4249-TOC-SPP-VHCA-1A ENV-2020-4250-CE	Demolish existing commercial storage building & one two-story single-family dwelling & accessory buildings for 8-story, mixed-use building, with two levels of subterranean parking, 76,650 sf of floor area with of 85 dwelling units & 1,137 sf of commercial floor area, + height increase + open space reductions	Yes	Yes	Appeal Denied, Project Approved	13
Jun 2021	DIR-2020-1881-SPR-TOC-VHCA-1A ENV-2020-1882-CE	Construction of a seven-story, 77-ft 11” high multi-family residential building with 108,070 sf of floor area & 114 residential units (12 units ELI) on 26,617 sf site with 159 parking spaces, exporting approx. 21,000 cubic yards of excavated earth	Yes	Yes	Appeal Denied, Project Approved	10
Jun 2021	DIR-2020-6681-TOC-SPR-HCA-1A ENV-2020-6682-CE	Demolish existing 16,859 sf post office building, surface parking & two trees for 7-story, 100 ft high, mixed-use building with 150 dwelling units (15 ELI units) on approx. 171,104 sf of floor area, including 12,906 sf of ground floor commercial retail space, & a FAR of 5.22:1 with 173 parking spaces	Yes	Yes	Appeal Denied, Project Approved	10
Jul 2021	CPC-2020-6467-CU-CPIOA ENV-2020-6468-CE	New 3-story, 45-ft high public charter middle school (Grades 5 – 8) building with FAR of 1.3:1 totaling 35,320 sf & one subterranean level of 18 parking spaces a combined max enrollment of 500 students on vacant site. Grading & export of approx 9,000 cubic yards of soil	Yes	No	Project Approved	9
Jul 2021	CPC-2019-6375-CU-DB-ZV-PHP ENV-2019-6376-CE	Demolish existing 1-story, 1,569 sf 1954 single family dwelling & one-story, 1,512 sf 1948 triplex for a 4-story, 45-ft 6” high residential building with 15 units (2 units VLI & 1 unit LI) with 16,883 sf floor area & FAR of 4.05:1 on 16,059 sf site with 16 parking spaces, + height increase + zone variances, + reduced setbacks + increase in density	Yes	No	Project Approved	2
Jul 2021	VTT-74596-1A ENV-2016-4555-SCEA CPC-2016-4554-GPA-VZC-HD-DB-SPR	Demolish existing buildings & parking lot for 8-story, 127-ft high mixed use, merger & re-subdivision of 11 lots into one ground lot for 6 airspace lots &106 live/work condominium units, export of 38,985 cubic yards of earth + waiver of parking requirements	SCEA (“no effect”)	Yes	Appeal Denied, Project Approved	14

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Vacant, Commissioner

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Aug 2021	CPC-2020-4648-CU-DB-VHCA-PHP ENV-2020-4649-SCPE	Demolish existing parking lot for 7-story, 85-ft high multi-family residential development with 86 dwelling units (21 units VLI) & 61 parking spaces	Yes	No	Project Approved	13
Aug 2021	CPC-2021-613-DB-CU-PHP-HCA ENV-2021-617-CE	Construction of 6-story, 66-ft high mixed-use residential building with 54 dwelling units (7 VLI units) & 3,103 sf of ground floor retail space. 36,799 sf floor area with FAR of approx 3.25:1 & 54 parking spaces on vacant lot & grading and export of 8,160 cubic yards of soil	Yes	No	Project Approved	10
Sep 2021	CPC-2013-1495-CU-PA1-1A ENV-2020-3420-CE	Increase enrollment three schools from 1,250 to 1,300 students, allow rental of facilities to third parties, allow filming for commercial purposes, allow classroom instruction from 7:40 a.m. to 3:45 p.m. daily, allow active use of outdoor areas, discontinue compliance reporting requirements, etc...	Yes	Yes	Appeal Denied, Project Approved	7
Sep 2021	DIR-2019-5859-TOC-SPP-1A ENV-2019-5861-MND-CE	Construction of 6-story, 75 ft high, 51,137 sf, 69-unit apt building & 50 parking spaces. Export approx 4,200 cubic yards of excavated earth + reduction in setbacks + decrease in open space	Yes	Yes	Appeal Denied, Project Approved	1
Oct 2021	VTT-74550-CN-1A ENV-2016-3691-EIR SCH. 2018021068	Merger & re-subdivision of 8 existing into one ground lot for commercial/live/work condominiums, + Haul Route for the export of approx. 74,500 cubic yards of soil	Yes	Yes	Appeal Denied, Project Approved	14
Nov 2021	VTT-82107-1A ENV-2019-5735-SCEA	Merger & re-subdivision of 6 lots into 3 lots & 10 commercial condominiums + haul route for export of approx 62,000 cubic yards of earth on a 70,558 sf lot in the [Q]R5-3-O & R1-1 Zones	Yes	Yes	Appeal Denied, Project Approved	5

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Nov 2021	CPC-2021-3871-DB-MCUP-SPR-VHCA ENV-2019-7526-SCPE	Demolish existing commercial buildings & surface parking for construction of 8-story, 95 ft high, 205,053 sf mixed-use building with 198 residential units &16,000 sf ground floor commercial space with 278 parking spaces & a FAR of 4.45:1 + Density bonus + increase in FAR + waiver to permit zero foot side yard setback	Yes	No	Project Approved	13
Nov 2021	CPC-2019-7522-VZC-CU-ZAA-SPR ENV-2019-7523-MND	Demolish 6 existing structures for 7-story, 84-ft high, 131-room hotel with a 4,808 sf ground floor commercial space & 77 parking spaces	Yes	No	Project Approved	5
Dec 2021	CPC-2016-1103-MCUP-DB-SPR ENV-2020-4929-SCPE DIR-2012-1467-DB-SPR	Demolish existing 2-story commercial building & parking lot for construction of a 5-story, 89 ft high mixed-use project with 91 residential units (8 units VLI), 10,000 sf of commercial uses over 4 levels of subterranean parking on a 26,890 sf lot with a FAR of 3:1, + Density Bonus + increase in FAR + reduction in open space	Yes	No	Project Approved	13
Dec 2021	CPC-2016-1104-DB-SPR ENV-2020-4930-SCPE VTT-74141 ZA-2012-1511-ZV-ZAA-DB-SPR	Demolish existing motel, auto shop, 2 duplex's & 1 SFD residence for construction of 4-story, 68 ft high, mixed-use building with 108 residential units (10 units VLI), 4,500 sf fitness center & 999 sf of restaurant over two levels of subterranean parking, on 36,206 sf lot with 101,300 sf of floor area, with a FAR of 3:1 + Density Bonus + increase in height + reduction of setbacks	Yes	No	Project Approved	13
Dec 2021	ADM-2021-3739-DB-HCA-1A	Construction of 4-5-story, 56-ft high, 11-unit apt building (1 unit VLI) with 15 parking spaces & a FAR of 2.70:1, + Density Bonus, + side yard setback reductions, + increase in height	Yes	Yes	Project Approved	11

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Renee Dake Wilson, Commissioner

DATE	CASE#	REQUEST	FOUND CEQA EXEMPT ?	APPEALED	RESULT	CD
Dec 2021	CPC-2019-5425-DB-MCUP-SPP-SPR-PHP ENV-2019-5426-SCEA VTT-82282	Construction of two, 86-ft high, mixed-use buildings with 401 residential units (61 units VLI, 20 units LI), 380,112 sf FAR, up to 40,454 sf of commercial/community floor area, on two sites approx 4.19-acres. West Site: 206,803 sf building with 225 residential units, 7,504 sf of ground- floor commercial/restaurant uses, and 2,650 sf of community space on a 1.93 acre site. East Site: 173,309 sf building with 176 residential units, 30,300 sf of commercial floor area on a 2.25 acre site, + Density Bonus + Reduction in open space, + Increase in height, + Reduction in setbacks	Yes	No	Project Approved	10

July 1, 2022

Via E-mail to:
CPC@lacity.org (Cecilia Lamas, Commission Executive Assistant)

Re: CASE NUMBER: DIR-2018-6634-TOC
CEQA: ENV-2018-6635-CE
ADDRESS: 1251-1259 West Sunset Blvd. Los Angeles, CA 90026
(also known as the Stires Staircase Bungalow Court or "Stires")

To: President Samantha Millman, Vice President Caroline Choe, Commissioner Jenna Hornstock, Commissioner Helen Leung, Commissioner Yvette López-Ledesma, **Commissioner Karen Mack**, Commissioner Dana Perlman, Commissioner Renee Dake Wilson:

At its April 14, 2022 CPC meeting Commissioner Mack had expressed an interest in how approval of projects affects climate change. She asked her fellow Commissioners what the Commission could do to learn more about the impacts from their decisions, and how they are contributing to climate change and what the CPC could do in attempt to carry out their duties in a manner that addresses environmental needs.

I was incredibly pleased to hear one of the Commissioner's raise concern about this issue because the evidence shows this Commission has found CEQA to be "EXEMPT" from more than **99.9%** of the projects you approve (2021, CPC Agendas). I had to wonder if Commissioner Mack had any idea her Commission has never found a project to have impact on the environment. If this is truly what the CPC believes - then this Commission is in possession of some paramount knowledge and techniques other cities and environmentalists would be on the edge of their seat to hear about.

When I got excited to bring some suggestions to Commissioner Mack regarding how the CPC has the ability to take climate change and other environmental factors into consideration during the Commission's review process, I realized I don't really have anything to be excited about. I thought to myself - is Commissioner Mack totally unaware of CEQA and what its legislative intention is? Does the Commissioner know how the DCP issues project approvals having done absolutely no environmental review? Or worse - alleging they *have* done one, and have universally concluded there is no project anyone could ever propose in the city of Los Angeles that will *ever,* have an impact on the environment? Have the Commissioners not made a connection between CEQA and climate change? CEQA has been swept under the rug by the city for so long, its policies and purposes are not even heard anymore. It is highly unfortunate that the state law we already have specifically to mitigate and consider the

environmental impacts of a single project, be so blatantly ignored. Different outcomes result from CEQA being followed, which begs the question residents have been asking city planners and Commissioners more than ever in the last 5-7 years - Why are you approving projects that are so out of compliance with the rules? Including your own?
(never are the questions answered)

While Commissioner Mack's statements deserve a much broader discussion between the CPC and interested members of the public, I would like to include in this letter some suggestions, some facts, some opinions and some questions I am asking the Commissioners to respectfully ponder and answer. While several sections of this document relate to the Stires property, I use Stires as the example for the more broader sections in order to ask the CPC to start showing an interest in the cumulative impacts of their decisions. All references used herein including studies, citations, web-links directing the reader to relevant data or other form of evidence and facts, are submitted as substantial evidence in the record as defined in PRC 21082.2. When the city illegally approves the destruction of the Stires staircase in its illegal approval of the applicant's illegal project, this letter and its references will become part of the Administrative Record when the city and Real party are sued.

• PLEASE <u>READ</u> THE APPEALS FILED •

Someone has been affected so deeply, aggrieved so badly by a project, they have to quickly learn what rights they have and the process as to how to exercise them. Someone, likely took off work, and took time away from their families, and can't sleep at night because they have to figure out how to explain to you where and why the city department erred. That someone pays taxes, payed an ever increasing appeal filing fee, is a resident of this city, and in many cases, living paycheck to paycheck. Nevertheless, if their appeal was timely filed, deemed accepted and it successfully reached the CPC, <u>it deserves to be read</u>. More importantly, its merits and their supporting evidence are not only supposed to be, but they deserve to be, given consideration. Note that the CPC relies solely on what the DCP is delivering. Sure, you may assume the DCP has done what they are supposed to do and that their "findings" are supported by "substantial evidence". But if they are wrong, and an appellant has been able to demonstrate that to you, assume the DCP has been wrong again. Even when appeals are not filed.

A burning question that remains unknown is if this Commission is aware of just how many applicants perjure themselves, flat out lying on their planning applications. Do you know this and just not care? Is this Commission aware of just how many applications misinform the DCP by claiming there IS housing available within the area of their project at the same (or approximate) rent? They either leave this blank or say

"YES". Given that they more or less all say "YES", this would indicate there is a plethora of available housing. Why would there be a housing crisis if that's the case? Why is it acceptable for project applicants to write untruthful responses to the questions in the applications, but more importantly - why is the information provided not verified? At what point is anything read, confirmed and decided based on the actual facts of a case? When did this start to become so much to ask of our city departments - to simply read and verify the information provided to them. The impacts of not verifying an applicant's paperwork are one reason development is totally chaotic including all of the evictions. Is the Commission aware of how many residents have been forced out of their Rent Stabilized home because you approved the project that tears it down? Tearing up the environment, the topography, ripping the trees out of the ground whose roots extend for miles, destroys the habitat needed to secure a balanced ecosystem - all to satisfy a story a developer sold the DCP so the DCP could sell it to you - and you bought it. Other burning questions residents have for the CPC include:

- Has the Commission ever followed up on ANY of the projects they have approved?
- Have any of them actually been built?
- Are the units rented? Vacant?
- Are the 1 or 2 "low-income" units that they promised actually rented by "low-income" residents?
- *If* the units are rented, were they rented to individuals or families that were struggling to find housing prior to the development?
- Have you seen proof that the project positively contributed to the community? To the City?
- Does the Commission have any idea where tenants that were thrown out of their living quarters ended up?
- Do you know if they were able to find housing and if so, at the same rate in rent they paid before?
- Are these approvals actually working and fixing the housing problem you believe exists?
- Why does the Commission choose to not address all of the vacant rentals that exist? Or all of the properties that are owned by foreign countries, also sitting vacant?
- What evidence exists showing that residents *want* to live in "new" buildings? (when the evidence proves the majority want the character and style of older buildings)

- What makes today's "housing crisis" different than the ones the City was complaining about ten years ago?

This Commission needs to know the decisions you are making at these meetings are a simple "yes" or "no" for *you*. But they are decisions that have caused and continue to cause permanent environmental damage, as well as personal, life altering changes to actual living people and living organisms. Every "yes" made by **this Commission says "yes" to:** increasing greenhouse gas emissions, increasing traffic, creating heat islands, removing existing rent control units from the housing market, evicting residents who have nowhere to go, causing avoidable construction and toxic debris waste which winds up creating carbon and methane at the dump (assuming there's room at the dump), removing well established carbon absorbing flora from the environment, removing part of the city's heritage, increasing energy use, increasing water use, increasing waste, imposing stress on poorly managed infrastructure, allowing dangerous applicants into our neighborhoods (in some cases) and so on.
So, Commissioner Mack: There is something you can do. Help get these answers before voting "yes". Respectfully, understand your role as to how much positive change you have the power to manifest, if "yes" was only voted when actually warranted. "It's not enough just to build" (Wesson, 2020). It is also not enough to simply rely on the information given to you by the same department seeking your approval. There is a reason public participation is required here and more often than not, it is to bring your attention to the laws the DCP and the city are not following and the abuse of discretion that has taken place. There is also a reason project applicant's have attorneys representing them. When breaking the laws, having an attorney represent you seems like a reasonable decision. Some of the impacts and concerns requiring broader discussions by the CPC include the following:

• DEMOLITION OF OLDER BUILDINGS •

Every time an older building is demolished, its time period construction materials are destroyed. Including all of the benefits those materials provided. Was the CPC aware **modern homes & materials burn 8x faster** and hotter than older homes and construction materials? (UL, 2011). Building and construction account for **39% of energy related carbon dioxide emissions.** Two mitigation measures identified by the Intergovernmental Panel on Climate Change for the building sector to reduce their carbon emissions contribution are (1) reducing individual buildings' operational impacts and (2) reducing individual buildings' embodied impacts (Baker et al., 2021).
The Environmental Protection Agency's report on sustainable materials

management has proven **the amount of construction and demolition (C&D) debris is double that of generated municipal solid waste. Building demolition represents more than 90 percent of all C&D waste. Encouraging adaptive reuse could represent an approach that increases housing supply while staying coherent with statewide climate goals** (EPA, 2020, Garcia et al., 2021).
Two key arguments for the retention and refurbishment of buildings over their demolition and rebuild are:

> **(a) the retention of heritage value, and**
> **(b) the lower embodied greenhouse gas emissions ('embodied carbon') produced by retaining buildings. Research has demonstrated the validity of both, with heritage value having positive social and economic impacts, and retaining and retrofitting buildings often shown to have lower environmental impacts.** (Baker et al., 2021).

Studies prove time and time again - **"The reuse of existing buildings is a more sustainable strategy than demolition and replacement."** (Conejos et al., 2012). "The **positive role that retaining buildings** can play in **reducing our impact on the climate must also be stressed to all stakeholders.** This research demonstrates that **retention of buildings,** be they heritage or not, **have social, economic, and environmental values** which all interact to varying degrees depending on time and place; **the challenge is ensuring each is acknowledged and considered in decision making"** (Baker et al., 2021). The City's 2021-2029 Housing Element correctly states:

> "Analysis conducted by HCIDLA shows **vacancies are lowest among rent stabilized and older housing units. Newer units have higher vacancy rates..**" (City of LA, 2021)."

Making better use of existing buildings is a major contribution to climate change adaptation and encourages "a culture of reuse" where the impacts of a changing climate can be minimized as much as practicable (Conejos, 2012).

Several years ago, a Los Angeles Case Study Report titled "Learning from Los Angeles" reported **character-rich blocks of older, smaller, mixed-age buildings contained more than twice as many units of affordable rental housing, more diverse residents** in terms of race, country of origin, and sexual orientation and **more than twice** the number of women and minority-owned businesses—compared to areas with large, new structures (NTHP, 2017). The report informed decision makers

back then that the city was in danger of losing these buildings, thereby losing the existing RSO and affordable housing. Our *previous* city leaders and commissions have managed to preserve these living spaces and buildings. Until now.

Studies reported in Young, 2004 show us how retaining buildings reduces overall demand on resources. Rehabilitation of older buildings contributes to a sustainable future and is the ultimate form of recycling. Architect Carl Elefante states "…the greenest building is one that is already built" (Elefante 2007, 26) (Young, 2014).

"Stewardship of the built environment recognizes the value of reusing existing buildings as a means to mitigate the long term extraction and depletion of natural resources and abating the landfill pressures caused by the unnecessary demolition of buildings, the energy needed to create new or replacement buildings and subsequently reduce unsustainable sprawl (Young, 2008)".

"The demand for energy, land and materials resulting from new developments needs to be tempered with taking better care of existing buildings, extending their life expectancy and using less energy. The existing stock has the greatest potential to lower the environmental load of the built environment significantly within the next 20 or 30 years." (Conejos et al., 2012).
So, Commissioner Mack: There is something you can do. Encourage adaptive re-use for proposals before voting to destroy our existing buildings that are <u>already</u> providing housing to residents. Ask one of our Councilmembers to initiate a motion that STOPS demolishing older buildings, particularly where there are exiting tenants in RSO housing (what's left of it) and other older buildings that contribute to the heritage and history of their neighborhoods. Not every building has to be "designated" historic in order to represent its heritage.

• MORE CONCRETE CREATING MORE PROBLEMS •

If the cement industry were a country, it would be **the third largest carbon dioxide emitter in the world** with up to 2.8bn tones (Watts, 2019). Concrete entombs vast tracts of fertile soil, constipates rivers, chokes habitats, outweighs the combined carbon mass of every tree, bush and shrub on the planet and in cities, **creates heat-islands, absorbing the warmth of the sun and trapping gases from car exhausts and air-conditioner units.** It's dust from demolition and from mixing and application **worsens respiratory diseases.** It is the highest air polluter found to exceed "safe" levels at every construction site tested. It is the destroyer of natural infrastructure and **<u>does not</u> replace** the ecological functions that humanity depends on for

fertilization, pollination, flood control, oxygen production and water purification (Watts, 2019). Construction and demolition (C&D) debris represents **more than 90 percent of all C&D waste.** There is only so much concrete you can usefully use without ruining the environment (Lehne & Preston, 2018).

Concrete is responsible for 8% of the worlds CO2 emissions (Williams, 2019). When the CPC approves projects that replace every square inch of open space on a parcel with concrete boxes, on top of removing all of the carbon absorbing trees, on top of introducing additional vehicles and more than tripling energy use, water and gas usage - you are making what is a globally recognized state of emergency for our environment, **an even bigger problem.** This is especially infuriating to residents because more often than not, these buildings do not solve what appears to be a self=proclaimed perpetuating pattern for this city, in advertising housing crisis, as it has been doing since the 1970's with never having met projections, throughout every decade. Until the city decides to implement strategies for the use of alternative concrete, or can resist the urge to continue granting approvals for destructive projects, this commission continues to pour gasoline on the fire.

So, Commissioner Mack: There is something you can do. When the DCP goes on record and tells you there is no substantial evidence that shows their project has "no impact" or "no effect" on the environment, take a closer look. Because every approval is creating another heat island. To clarify, a heat island is created when concrete and paving absorb energy from the sun during the day, and slowly release this energy into the air as heat (mostly at nighttime), which is when the temperature difference between urban and rural areas, and hence the UHI intensity, is usually largest. The lack of moisture in urban areas and increased anthropogenic heating also contribute to the Urban Heat Island (UHI) effect (Heaviside et al., 2017). When one approval, after another approval, after another approval has been granted, you have created miles of heat islands that have increased GHG's significantly. The DCP is *required* to consider CUMULATIVE IMPACTS which means the impacts of more than one project approval and because they refuse to do so, we are here.

• MORE ENERGY USE •

Energy is not only key to our economic development and wellbeing, it is also strongly related to many environmental impacts. Energy use also affects itself indirectly, as the urban heat island effect increases the need for energy use for air conditioning (Carreón et al., 2017). The IPCC has **repeatedly provided strong evidence** that climate change impacts are to be expected in the near future, as a function of continuing and increasing emissions of fossil fuel combustion

products, changes in land use, and other factors (Carreón et al., 2017).
Natural gas is our State's top electricity source (Popovich, 2020) and is composed mostly of methane, which is a hydrocarbon responsible for emitting greenhouse gases. Setting aside the indisputable fact that this site has been identified by the city as **a methane site**, let's remember methane is a colorless and odorless gas. Not seeing it does not mean it is not harming people. Additionally, the lost embodied energy of a demolished building has significance. Studies show a new building may take as many as 40 years to recover the new energy used to build the building (Jackson, 2005). The energy recovery period exceeds the expected useful lives of many buildings being constructed today. There is no real return on investment in terms of energy, since following the current mindset of "demolish and rebuild or build new" would **repeat these wasteful practices before the recovery period concludes.** Building construction consumes 40% of world resources and contributes 40% of the material going into landfills (NJN Public Television and Radio 2009). This flow could be easily reduced by **reusing buildings.** This is how you address climate change. This is also how you keep residents housed while accommodating growth in the areas demonstrating this need.

- **PLEASE STOP DESTROYING EXISTING MATURE TREES & HABITAT •**

A study really shouldn't be necessary when all you have to do is walk around any neighborhood to see the remnants of tree massacres that have occurred over the last 5-10 years. No amount of tree sapling planting will ever replace the benefits a mature tree gives to us (U.S.G.S., n.d.). To state the obvious: Replanted trees struggle to establish and reach maturity due to the demands of engineered surfaces around them. Sites have often torn up the earth, disrupting the topography making it extremely difficult for saplings to establish themselves (GreenblueUrban, n.d.). There is nothing wrong with planting new trees. However, there is a lot wrong with using them to justify the removal of mature trees. This Commission's habit of rubber stamping has contributed to the loss of the city's tree canopy - something you have taken away from all of us. Benefits we will not get back in our lifetime. Previous city leaders worked extremely hard with communities in order to ensure the advantage of the trees they planted would be furnished to us. The city also has a history of leaders who went to great lengths to protect shade trees. "**Aboricide** will no longer be tolerated by the City Council." "This instruction strikes differently at the fountain head of tree slaughter by street graders. If in the future it is found necessary to uproot a single tree in the improvement of a street, it will mean that the Engineer's department has blundered" (LAT, 1904).

So you see Commissioner Mack: The data proving the benefits of mature trees is extensive and seeing that I have more than likely exceeded the preferred number of pages for a submission, I kept this to an extreme minimum. Logic and a handful of studies should be sufficient to make this point understood. The CPC's interference with the city's ecosystem has already resulted in irreparable harm to our environment - for everyone. Our previous city leaders worked hard for these trees. We need our city leaders to do the same.
"The best time to plant a tree is twenty years ago" (Turner-Skoff et al., 2019).
Further on this topic, the Commission seems to be unaware of a state law called THE MIGRATORY BIRD TREATY ACT. This Act is a FEDERAL LAW (16 U.S.C. §§ 703—712) that makes it unlawful to pursue, hunt, take, capture, kill, or sell nearly 1,100 species of birds listed therein as migratory birds INCLUDING live or dead birds and grants full protection to any bird parts including feathers, eggs, and nests. Many of which species are inhabitants of our trees. Additionally, LAMC Sec. 53.48. finds it illegal for any person to kill any song bird or **destroy** or rob the **nest** of any such bird. The DCP has never been able to confirm, out of all the projects it has approved that involve the destruction of mature trees, just how many nests, eggs and juvenile birds it has also destroyed. Why? Because they determine there are "no impacts" sitting from their desk, while the living and affected organisms are the ones affected by your decisions most. The city has no enforcement or concern for these wildlife species and it continues to be a negative impact forced upon the community not only in the removal of our tree canopies, but in the habitat that has been stolen and seeing the evidence on the ground of nearby tree destruction sites where dead baby birds lie, or are half alive and helpless, or eggs recently laid by the adults, who no longer have habitat to reproduce, causing another negative impact by decreasing our wildlife. These impacts are unforgivable. Yet, this is what the CPC's unconditional approval give to us.

• **PLEASE STOP DEMOLISHING EXISTING RSO HOUSING** •

Here is the head-scratcher for the public: Justify over & over again at CPC meetings how you must approve a project in order to satisfy the city's ever-growing "housing crisis". Yet - you have agreed to demolish and permanently remove EXISTING RSO HOUSING FROM THE CITY'S STOCK. Example #1: In 2018 this Commission approved a project that forever removed and destroyed about **40 occupied RSO units** (LAT, 2018). Example #2: In January 2020 this Commission approved a project that demolished **30 occupied RSO units** (CPC Agenda, 2020). Example #3: In

April of 2020 this Commission approved a project that demolished **6 occupied RSO units** (CPC Agenda, 2020). You did it again in October **demolishing 8 more**, and in 2021 **demolished more than 25 occupied RSO** units, resulting in evictions (CPC Agenda, 2021). This has caused permanent damage to the city's RSO housing stock and we will never get those back. It appears as though the mission of this Commission may be to have all RSO units removed, little by little - because that is exactly what you are doing.

Arguably more important is a change of mindset away from a developmental model that **replaces living landscapes** (Watts, 2019). This commission has led the city's residents in the wrong direction when a state law *initiated* for purposes of protecting the people and their environment has been so blatantly ignored by this Commission, by determining that there is no project that exists as ever having had a significant impact on the environment. Does the Commission really believe that? Where do you think all of these impacts go? This is an infuriating argument to even try and articulate into words as the mere insinuation that nothing before you has impacted the environment is outrageously ridiculous. It is also extremely inaccurate.
So, Commissioner Mack: There is something you can do. Please review the environmental documents for the project before you, followed by another asking the DCP where, how and why they found that the proposal had no adverse impact on the environment (either concluded by the consultant *hired* by the applicant or the DCP made this conclusion on their own). Or better - ask them why no environmental review was done. Ask them how it is humanly possible for *their* project to be so immune to causing environmental impacts when every other city and state in our country is able to address their housing issues without imposing half the damage LA city departments are causing. Ask where all of the demolition debris go; the air pollution, the GHG's, the loss of open and green space, etc. We have no more room in our landfills. The trash that sits there continues to discharge methane gas into our environment. Methane = more than 80 times more potent than carbon dioxide in terms of warming the climate system (Garthwaite, 2021). Establishing a ZERO TOLERANCE attitude for the demolition of our cities existing RSO housing would be a good start. No one seems to have the guts to make this happen. Anyone without their own interests would have no problem doing this. Anyone with objections to doing this would have to explain why they believe demolishing occupied EXISTING Rent Stabilized Housing is a move in the right direction.

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> "THE CITY PLANNING COMMISSION ENDORSED THE SPRAWLING PROJECT THAT WOULD FLOOD THE NEIGHBORHOOD WITH THOUSANDS OF ADDITIONAL CARS AND **RESULTS IN THE DEMOLITION OF DOZENS OF RENT-CONTROLLED APARTMENTS.**" (LA Times, Sep 15, 2018)

(Is the CPC aware that RSO housing is NOT the same thing as "*affordable*" housing?)

This Commission should know why members of the public challenge CEQA and the answer could not be more simple - <u>because it is violated</u>. Although we are constantly accused of maliciously "holding up" projects or blamed for causing delay, this is simply not the case. If environmental impacts and the project are properly reviewed… If impacts are acknowledged, considered and addressed appropriately, we have no basis to waste our time or yours by filing legal actions (Turney & Fthenakis, 2011[1]). It could not be more simple. Follow the laws and you will likely not be accused of breaking them.

In conclusion, my message to you Commissioner Mack: If you choose to read this document and can appreciate all of the time it took to assemble the resources in attempt to deliver a compact package for you to unwrap and discover - there are things <u>you</u> can do. Imagine what the city would be able to accomplish and how our communities could sustain while accommodating each neighborhoods needs, to ensure cities are resilient against the effects of climate change and include mitigation strategies to reduce negative social, environmental and health impacts (Berghauser Pont, et al., 2021). The findings can be used to develop <u>evidence-based planning strategies</u>, which are currently lacking.

It should be noted that all web-links, studies, citations, articles, references to articles and/or other material mentioned herein are submitted into the administrative record of this case.

Thank you for reading.

Sincerely,

A member of the public impacted by this illegal development

[1] finding that delays in permitting occur largely because environmental impacts have not been studied or understood.

PLEASE SEE:

- 2016, Apr 2 LA Times: Tearing down to drive up prices; **More rent-controlled buildings are being demolished in favor of costlier housing...**

  "More than 1,000 rent-controlled apartments were taken off the market last year (i.e., demolished) -- a nearly threefold increase since 2013. Evictions from such units have doubled over the same time. More than 20,000 rent-controlled units have been taken off the market since 2001."

- 1998, Oct 25 LA Times: "A Public-Housing Policy That Says Fewer Units Is More"

- 1990, May 1 LA Times: Panel Urges Run-Down Housing Be Renovated

  "Operation Rebuild". "It's much cheaper to rehabilitate a house than to tear it down and start all over.. **The goal is to not deplete the available stock of affordable housing in Los Angeles.**"

PLEASE SEE THESE ARTICLES:

- 1945, Nov 7, LA Times: Supervisors Act on **Crisis in Housing**
- 1946, Feb 23, LA Times: The **Housing Crisis**
- 1946, Mar 26, LA Times: **Housing Crisis** Delays Hollywood Freeway
- 1952, Mar 17, LA Times: **Housing Crisis** Still On, Mayor Tells Veterans
- 1967, Jul 30, LA Times: '68 **Housing Shortage** Seen in Area
- 1969, Jun 7, LA Times: Cooperation Urged to Meet **Housing Needs...**
- 1970, Jan 12, LA Times: Suffering its **worst housing shortage**
- 1972, Jan 13, LA Times: **Housing Shortage**
- 1973, Mar 29, LA Times: Group to Study L.A. **Housing Crisis**
- 1974, Aug 18, LA Times: **..severe housing shortage** in next few months
- 1974, Oct 4, LA Times: ..need for more low and moderate income housing

- 1976, Sep 16, LA Times: We are facing a **housing crisis**
- 1977, Oct 22, LA Times: **Housing Crisis** in County Seen by ’87
- 1978, Apr 4, LA Times: Saying the city has a **housing crisis...**
- 1979, Oct 28, LA Times: **...**long-term solutions to the **housing shortage**
- 1979, Oct 28, LA Times: **Housing Shortage:** The Ultimate Myth?
- 1979, Nov 11, LA Times: **...** proposed project will contribute significantly to a rental **housing shortage…**
- 1979, Nov 30, LA Times: Meeting on **Housing Shortage**
- 1979, Nov 30, LA Times: LA area is currently facing a **housing crisis**
- 1979, Dec 27, LA Times: Worsening **housing shortage**
- 1980, Feb 18, LA Times: **...**the city's worst **housing crisis** ever**...**
- 1980, Apr 6, LA Times: Added Density Studied to Ease **Housing Crisis**
- 1980, Jun 19, LA Times: **...**because of the local **housing crisis**
- 1982, Apr 4, LA Times: the acute **housing shortage** existed years…
- 1985, Jan 27, LA Times: ”in the light of the **housing crisis** in the city,"
- 1985, Feb 28, LA Times: **...**the **housing crisis**
- 1987, Oct 4, LA Times: Los Angeles faces a severe **housing crisis**
- 1988, Nov 27, LA Times: **..**builders are alarmed by the **housing crisis**
- 1989, Apr 20, LA Times: Correcting a **Housing Crisis**
- 1990, Jul 10, LA Times: Vacancies Amid an **Apartment Shortage**
- 1990, Jul 27, LA Times: Los Angeles destroying usable dwellings amid a severe **housing shortage**
- 1990, Oct 7, LA Times: **...wiped out low-income housing** and contributed to homelessness.

- 1991, Oct 13, LA Times: ...resolve the **housing shortage**
- 1992, Feb 13, LA Times: ...relieve a horrific **housing shortage** in LA
- 2000, Apr 25, LA Times: New Development Trend an Answer to **Housing Crisis**
- 2006, May 21, LA Times: LA has a **severe shortage** of affordable housing
- 2007, Sep 28, LA Times: ...wound up with a **housing shortage**
- 2020, Mar 6, LA Times: Los Angeles facing a **housing crisis**

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• City of LA, 2021. 2021-2029 Housing Element CH1: Housing Needs Assessment, pg. 83

ATTACHMENTS:
• CPC-2022+2021.pdf (17 pages)

July 3, 2022
Letter to the City Planning Commissioners:

At its April 14, 2022 CPC meeting, the Commission continued case numbers DIR-2018-6634-TOC-1A / ENV-2018-6635-CE, 1251 – 1259 West Sunset Blvd, also known as the Stires Staircase Bungalow Court ("Stires").

While discussing the issue of a letter allegedly submitted to the DCP by the project applicant but not received by the DCP until that morning when allegedly discovered in a SPAM folder, some of the Commissioners (mainly Perlman) expressed concern over continuing this matter, due to the potential hold up of building "affordable housing".

This sent a signal that the Commissioners **had not read the appeal**, have not read the submissions filed by the public and therefore, **the Commissioners have no understanding as to what this project actually is.** Further, it has no understanding of the legal arguments made by the appellant, or the several other interested parties who have taken the time to inform you of important facts regarding this case. In this case, **if Commissioner Perlman had read the appeal documents, he would know that this project REMOVES 10 existing Rent-Stabilized housing units, while the illegal development alleges to include 5 or 6 "affordable" units in their incompatible and non-complying 70 market-rate unit behemoth**.

It is unclear as to how the City's Planning Commission can make such indefinite decisions that affect so many lives, without reading the material. It is also indicative of a failed system.

State legislation has declared that public Commissions, such as the CPC exist to **AID** in the conduct of **the people's business** (CGC 54950.). It is an absolute necessity that in doing so, this Commission be aware of what business is before them in order to make a decision pursuant to its authority under Charter Code 551., which is to offer its *advice* and *recommendations*.

Appellants pay a filing fee and go through a lot of time and trouble in order to bring important matters of facts, studies and evidence to your attention. **The CPC should not be holding public hearings on matters in which it has not read. Doing so serves as an admission that the CPC intends on approving the project, no matter what evidence is in the appeal.**

Sincerely,
Johnny M.

THE SILVER LAKE HERITAGE TRUST
A nonprofit Public Benefit Corporation

2568 Griffith Park Boulevard #277
Los Angeles, CA 90039
www.silverlakeheritage.org

July 3, 2022

Via E-mail to:
Cecilia.Lamas@lacity.org, CPC@lacity.org (Cecilia Lamas, Commission Executive Assistant)

Re: City Planning Commission - Appeal for: CASE NUMBER: DIR-2018-6634-TOC,
CEQA: ENV-2018-6635-CE
ADDRESS: 1251-1259 West Sunset Blvd. Los Angeles, CA 90026
(also known as the Stires Staircase Bungalow Court or "Stires")

To: Commission President Samantha Millman, Vice President Caroline Choe, Commissioner Jenna Hornstock, Commissioner Helen Leung, Commissioner Yvette López-Ledesma, Commissioner Karen Mack, Commissioner Dana Perlman, Commissioner Renee Dake Wilson

The Silver Lake Heritage Trust ("SLHT") works to preserve and protect the architectural, historical and cultural resources of Silver Lake and its neighboring communities, such as Angelino Heights. We also assist local tenants with housing security issues, and we extend these efforts to the City as a whole. Harmful projects such as this one serve as a perfect example of how the City supports the displacement of residents in well established communities, while simultaneously claiming "Housing Crisis" as a mantra to encourage the overdevelopment of our neighborhoods. SLHT hereby submits this letter, including all hyperlinks to webpages and attachments into the administrative record **in support of the appeal filed**.

Appellant Mr. Courtney did his due diligence prior to purchasing his property by familiarizing himself with the zoning laws and density restrictions surrounding the area. A reasonable individual relies on these zoning details before deciding where they are going to live. A proposal having no environmental review in a hillside area with stability issues, in a methane zone, approved with a **fifty percent over the limit** density bonus, was never foreseen. Regulations such as environmental reviews and density restrictions exist to ensure public safety, protection for homeowners, and to effectuate consistency within the neighborhoods of the City, per the City's General Plan and all of its elements. When the City's Department of City Planning ("DCP") fails to protect its residents from harmful and non-complying projects such as the proposed, it creates distrust and conflict within our local judicial system. We rely on the DCP to put our safety and compliance before catering to developers. Here, the DCP has failed to do so.

FAILURE TO COMPLY WITH CEQA
THE DCP WRONGFULLY GRANTED A CATEGORICAL EXEMPTION

CEQA Statute & Guidelines section 15061(b)(3) **"Where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA."**

1. Violation of California Code of Regulations ("CCR") 15061(b)(3).

a. The DCP wrongfully issued a Categorical Exemption for the project by failing to provide any evidence in the record where it can be seen with certainty that there is no possibility that the activity in question may **not** have a significant effect on the environment.

b. The DCP wrongfully issued a Categorical Exemption for the project by failing to acknowledge the evidence that exists in the record that PROVES a significant effect on the environment exists.

2. Violation of CCR 15300., 15300.2(b), 15300.2(c)

a. The DCP wrongfully issued a Categorical Exemption by failing to research, review and gather relevant data that proves there are existing cumulative impacts. Multiple projects exist on 3 sides of the appellant, and extend into the surrounding area. The DCP failed to disclose these projects and include them as cumulative impacts. Class 32 exemptions must be consistent with the applicable general plan designation and all applicable general plan policies as well as with the applicable zoning designation and regulation. The courts have warned against "mechanical application" in situations where agencies have failed to gather data necessary for an informed decision. Because CEQA places the burden of environmental investigation on the government rather than the public, an agency is legally required to gather and report relevant, objective data.

b. The DCP wrongfully issued a Categorical Exemption for the project by failing to disclose the reasonable possibility that the activity related to this project will have a significant effect on the environment.

3. Violation of CCR 15332.

a. The DCP wrongfully issued a Categorical Exemption for the project failing to disclose the inconsistency with the City's General Plan and all applicable plan policies, zoning designations and regulations.

b. The DCP failed to provide any evidence of any study done related to habitat for endangered, rare or threatened species, as this site is rich in biodiversity.

c. The DCP failed to provide any evidence that this project does not result in any significant effects related to traffic noise, air quality, or water quality.

One example of the DCP's failure to comply with the above sections includes Appellant's Exhibit B. A recent report prepared by a geologist we and appellant Mr. Courtney retained to perform an independent study at the site location (which is in a methane zone). The DCP has **blatantly ignored the expert opinion of the geologist**. The DCP has failed to comply with **PRC 21082.2**, which requires substantial evidence to include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts, as provided by the Appellant. Further, if the DCP failed to conduct any independent study and has relied solely on the applicant's report, this is not objective, reliable data. We bring to the CPC's attention a few highlights from the experts report below:

Page 1 of said report:

> "You have indicated that no geologic or geotechnical investigations have been conducted on the subject properties. There is no indication that historic aerial photographs were interpreted to determine pre-development geologic conditions at the site, for example evidence of landslides, faulting, or oil/gas drilling/development. There is no indication in the City of Los Angeles' 2018 Environmental Assessment Form (EAF) that an assessment of potential Methane Zone hazards has been addressed (ZIMAS, 2021, zimas.lacity.org/)."

Page 2 of the report:

> "To our knowledge no geologic mapping has been performed at the subject properties, in connection with the proposed project. Immediately to the south (Geotechnologies, Inc., 2013) three geologic units are mapped: 1) Quaternary colluvium (map symbol Qcol), 2) Quaternary alluvium (Qal), and 3) Tertiary (Miocene) Puente Formation bedrock (Tp). Based on the size of the proposed apartments and associated parking area, the subject properties areas of with Qcol and Qal would be removed from the site, so that in those areas only Tp bedrock would remain. Although not mapped, it is likely that man-made artificial fill (af) would be found at the western portions of the subject properties and would be removed as part of the 18,200 to 19,885 cubic yards of export per the EAF."
>
> "Fractures mapped in test pits excavated and mapped in 2013 (Geotechnologies, Inc., 2013) would be important to slope stability analysis since they are planes of weakness that can separate materials into smaller block and wedge failures on cut slopes where they intersect bedding planes. Slope failures potentially affect public safety."

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"No fault mapping has been performed at the subject properties. Lamar (1970) maps a north-northwest to south-southeast trending fault a few hundred feet west of the subject properties (see Figure 1). It is not known if this fault is associated with the underlying active Elysian Park blind thrust fault, and if any potential for surface rupture/deformation exists. Due to expected mapping accuracy at the 1:24,000 map scale, the fault location could be off by a few hundred feet."

"Figure 1 shows the ECI faults, projected along the strike direction, to pass through and very near the subject properties." The potential for these ECI faults to project to the north-northeast through the subject properties raises the concern that a potentially active fault (for which LAUSD demolished several useable buildings) could underlie the subject properties. No studies have been performed, or have been required, for the proposed 70-unit multi-family apartment building and associated 35 parking spaces. An active or potentially active fault would have public safety implications."

Page 3 of the report:

"This "out-of-slope" bedding condition (Figure 2) indicates that the southern portion of the 1251 site is potentially unstable and a bedding plane failure is possible..."

"Geotechnical exploration, laboratory testing, and slope stability analyses are necessary to determine the degree of potential instability and the level of hazard posed by the proposed development to the 1251 site and surrounding areas see Figure 2 red cloud areas). To our knowledge no such studies, testing, or analyses have been performed."

"Structures upslope from the project site appear to be in areas where rainfall, irrigation, and surface run off could infiltrate the ground surface and flow down gradient toward the project site. It is assumed that the pathways would be predominantly along fractures and bedding planes in the Puente Formation bedrock. This condition should be fully considered in slope stability analyses."

"Our review indicates several technical issues that we feel should be considered and addressed prior to approval of the project as it is currently defined. In particular, the Methane Zone hazards, potential fault locations/activity levels and bedrock slope stability due to the proposed slope angles, the dip angles of existing bedrock bedding, assumed material strengths, presence of fractures, up slope groundwater/seepage, and orientation/height of the proposed permanent and temporary slopes."

The results of this report serves as evidence in the record that this site has serious stability issues. The DCP has failed to consider public health and safety pursuant to LAMC section 12.22A25g2(i)(c)(ii) which requires the Director NOT APPROVE a project when:

(ii) **The Incentive will have a Specific Adverse Impact upon public health and safety or the physical environment).**

As Mr. Courtney pointed out in his justification for the appeal, the City's own resource (ZIMAS), identifies this site as a methane zone. Yet no investigation was conducted regarding the peril of this lethal and noxious gas inherently present at this site. It is especially disturbing that the DCP failed to disclose serious safety issues at the sites neighboring property, as described in detail in Appellants appeal (Appellant Courtney's appeal, page 6). Other projects in the area have been required to install Methane Mitigation systems and methane gas venting systems, such as 1250 W Sunset Blvd (directly across the street from Stires).

According to Zimas:

> "**These areas have a risk of methane intrusion emanating from geologic formations. The areas have developmental regulations that are required by the City of Los Angeles pertaining to ventilation and methane gas detection systems depending on designation category."**

A 2016 article titled " Three Decades Before Porter Ranch, a Methane Explosion Derailed L.A.'s Subway Plans" describes the disaster that took place when "Methane from a mysterious underground source had silently been seeping into the basement of the Ross Dress for Less in L.A.'s Fairfax District when, on the afternoon of March 24, 1985, an employee punched his timesheet in an adjoining room, emitting a spark and igniting the pool of odorless gas. The ensuing explosion launched the store's roof into the sky."

Can the DCP say **with certainty** when workers begin excavation and someone lights a cigarette, that there would be NO IMPACTS and the community and public are safe? Assuming the DCP's answer is yes, what evidence exists in the record proving this? **There exists NO evidence in the record that supports their current position. The DCP CANNOT say with any certainty (or at all) that the activity in question may *not* have a significant effect on the environment, as CEQA requires them to do.**

4. Violation of CCR 15064(a)(1), 15064(d), 15064(d)(1), 15064(f)

   a. The DCP wrongfully issued a Categorical Exemption for the project failing to research, review and gather relevant data that would show significant negative effects on the environment. In addition, the DCP has failed to acknowledge and consider the evidence in the record proving the same.

   b. The DCP failed to acknowledge the evidence in the record that proves a direct physical change to the environment which may be caused by the project, exists.

   c. The DCP failed to consider and acknowledge the "physical change in the environment which is caused by and immediately related to the project" (PRC 15064(d)(1). (See page X for DEFINITION of "physical change in the environment").

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5. Violation of CCR 15064.4

a. The DCP failed to provide scientific and factual data, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from the project, the extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting.

This project invites **128 additional vehicles** into the community which do not currently exist. Interesting that the project includes so many vehicles, considering it was approved as a "TOC" - ostensibly a program alleged to encourage people to discard their personal vehicles and take public transit (despite all evidence proving this theory does not work).
ONE vehicle produces an estimated 4.6 metric tons of Greenhouse Gas Emissions (GHG) PER YEAR (epa.gov). 4.6 metric tons multiplied by 128 vehicles = 588.8 metric tons of Greenhouse Gas Emissions PER YEAR (epa.gov, 2022).

By approving this project, the DCP invites almost <u>six hundred metric tons</u> of Greenhouse Gas Emissions into this neighborhood in order to accommodate more vehicles.

Not only did the DCP fail to include ANY GHG data, but they failed to include ANY data and/or ANY factual evidence that 588.8 metric tons of GHG's has no significant effect on the environment. State law disagrees.

CEQA requires local agencies such as the DCP "give major consideration to preventing environmental damage" (CCR 15021(a)(1)).

6. Violation of CCR 15064.5, CCR 15300.2(f), PRC 21084(c), PRC 21084(d),

a. The DCP wrongfully issued a Categorical Exemption for the project failing to acknowledge and consider the Stires property as a historic resource.

b. The DCP has failed to provide ANY evidence demonstrating the STIRES property is NOT historic, and has further disregard the preponderance of evidence proving IT IS. PRC 21082.2, requires substantial evidence to include **facts**, **reasonable assumptions predicated upon facts, and expert opinion supported by facts.** All of which exist in the record, proving the historic and cultural significance of the STIRES property. CEQA prohibits the use of a Categorical Exemption for a project which may cause a substantial adverse change in the significance of a historical resource.

7. Violation of California Government Code ("CGC") Section 65915.(d)(1)(B)

a. The DCP wrongfully issued a Categorical Exemption by granting incentives that have adverse impacts on a historical resource. Based on the substantial evidence in the record, the DCP failed to make written findings disclosing the STIRES historic and cultural significance as described further below.

The Cultural Heritage Commission recommended the Stires Staircase Bungalow Court be designated as a Historic Cultural Monument based on having met **ALL three available criteria** of the City's Cultural Heritage Ordinance. This is an incredibly rare and impressive finding.

Please click here to be taken to the audio recording of the August 6, 2020 Cultural Heritage Commission hearing where the historic significance of the Stires property was determined by the experts.

PRC 21084.

> **"(e) No project that may cause a substantial adverse change in the significance of an historical resource, as specified in Section 21084.1, shall be exempted from this division pursuant to subdivision (a)."**

PRC 21084.1.

> **"Resources listed in, or determined to be eligible for listing in, the California Register are resources that must be given consideration in the CEQA process." "The fact that a resource is not listed in, or determined to be eligible for listing in, the California Register of Historical Resources, not included in a local register of historical resources, or not deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1 shall not preclude a lead agency from determining whether the resource may be an historical resource…"**
>
> **"lead agencies have a responsibility to evaluate them [historic resource] against the California Register criteria prior to making a finding as to a proposed project's impacts to historical resources."**

CCR 15064.5, 15064.5(3).

> **"Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant".**

The DCP failed to evaluate Stires against State criteria prior to making any findings regarding impacts to a historical resource. Considering the DCP are not experts in historic designation, the findings of the CHC should have sufficed, since the California Register of Historic Resources criteria is identical to the criteria in the City's Cultural Heritage Ordinance. **The preponderance of evidence in the record clearly demonstrates beyond doubt, that the STIRES property is historically and culturally significant.** Stires met **all three available criteria** of the City's

Cultural Heritage Ordinance. The DCP failed to act on their responsibility as a lead agency to consider Stires under CCR section 15064.5. Further, **the record is absent ANY evidence demonstrating the site is NOT historically significant** as required byCCR 15064.5. Further, the record is absent ANY evidence demonstrating the site is NOT historically significant.

The DCP withholding such critical facts to this Commission is another ground in which this appeal must be upheld.

"The 'foremost principle' in interpreting CEQA is that the Legislature intended the act **to be read** so as to afford the fullest possible protection to the environment within the reasonable scope of the statutory language." Communities for a Better Env't v. Cal. Res. Agency (2002) 103 Cal.App. 4th 98, 109 (CBE v. CRA).

CCR 15064 describes the procedures a lead agency must use when determining the significant effects caused by a project. For your convenience, we have included a "Definitions" page at the end of this document to assist the DCP in interpreting some of the code sections they have ignored.

FAILURE TO COMPLY WITH TOC ELIGIBILITY REQUIREMENTS
The DCP has wrongfully approved this project as a TOC when it fails to meet the "Guidelines"

1. Failure to comply with Los Angeles Municipal Code ("LAMC") 12.22(a)(25), CGC 65915

    a. The DCP's actions are in direct contradiction with City and State policy, both stating its purpose is "to increase the production of affordable housing, consistent with City policies". The DCP approved this project despite its **failure to increase production of affordable housing**, and instead, approved a project that **creates a NET LOSS of housing, specifically, RSO housing**. The DCP fails to demonstrate where and why the applicant is given three incentives, when permanently removing RSO housing from the community and forcing decades long tenants out of their homes.

This proposal seeks approval for:

> "a 50% increase in density along with the following 3 incentives for a Tier 1 project (25% reduction in the required side yards, a 25% reduction in the required rear yard, a height increase of one 1 additional story up to 11 additional feet") totaling 70 dwelling units, reserving 6 units for Extremely Low Income".

Several of the significant impacts omitted by the DCP include but are not limited to:

- **Removing** 10 existing Rent-Stablized (RSO) housing (some occupied)
- **Removing & Displacing** tenants (some living there more than 25 years)
- **Removing** approximately 16 mature trees and tree canopy, a benefit to the community

- **Removing** existing habitat and resources for local wildlife, including migratory birds subject to the Migratory Bird Treaty Act
- **Disrupting** native topography without performing any soil studies to assure safety
- **Provoking** what has proven to be an unstable slope (See appellants Exhibit B)
- **Imposing** an additional 128 vehicles into the neighborhood
- **Removing** permanently and forever an existing historical resource, eligible for State designation

2. Failure to comply with the City's General Plan and the Elysian Valley Community Plan.

ECHO PARK NEIGHBORHOOD COUNCIL REPEATEDLY AND STRONGLY OPPOSES THIS PROJECT

In February 2019 the Echo Park Neighborhood Council ("EPNC") voted unanimously in OPPOSITION of this project stating in part:

> "EPNC is in **opposition** to project based **insufficient outreach including to current residents, excessive height and grading, lack of necessary parking for the area and misapplication of TOC Tier-1 designation to this location, and the project resulting in loss net of affordable housing**"
>
> "Hilltop residents living directly above proposed project expressed concerns for the **safety of their dwellings** in terms of the vast amount of projected grading involving this project on Sunset Blvd."

Attached hereto as **ATTACHMENT A** is a true and correct copy of the February 26, 2019 EPNC Letter of opposition.

On September 30, 2021 the Echo Park Neighborhood Council held a meeting with a quorum of 14 board members. **Again, ALL** voted unanimously in OPPOSITION of this project stating in part:

> "**For the past 2.5 years EPNC has continually and repeatedly opposed the 5-story, 70-unit TOC project at 1251-1259 W. Sunset Blvd.**"
>
> "**It is not in the best interests of the constituents of Echo Park, the majority of whom are legacy residents of rent stabilized housing.**"
>
> "The approval will not only **displace**, but **reduce** the number of RSO housing stock in Echo Park."

> "The job of the DCP is to approve or deny these proposals based on the needs of the specific community according to the **general and specific plan.** This project does not comport with the needs of this community, and your continued approval ignores the valid and important objections from the many stakeholders who have spoken out against this project."

Attached hereto as **ATTACHMENT B** is a true and correct copy of the September 30, 2021 EPNC Letter supporting the appeal.

Although there is no legal requirement for the DCP to follow the Neighborhood Council's recommendation, it is our position that the EPNC's comments go to the needs and safety of the community, and the department's failure to conform with public necessity, **which is a legal requirement** the DCP is held to. **The DCP is required by Charter to RESPOND TO LOCAL NEEDS**.

The Los Angeles **Charter Code Section 900. Purpose** (of Neighborhood councils):

> "To promote more citizen participation in government and **make government more responsive to local needs**, a citywide system of neighborhood councils, and a Department of Neighborhood Empowerment is created. Neighborhood councils shall include representatives of the many diverse interests in communities and **shall have an advisory role on issues of concern to the neighborhood.**"

The DCP has been "advised" for nearly three years now that this project is NOT suitable or needed in their neighborhood.

APPLICANT CAN "OPT OUT" OF BUILDING LOW INCOME HOUSING AT ANY TIME

Included in (but rarely ever talked about) Measure JJJ is a clause which **allows developers to opt out of their affordable housing requirements by paying in-lieu fees** to the City's Affordable Housing Trust Fund (AHTF) (Measure JJJ/SEC. 11.5.11. AFFORDABLE HOUSING/(b)(3)). By claiming financial hardship and invoking this clause, the developer is released from their obligation to build any affordable housing units within their current project. If the above option is utilized, the applicant has permanently removed RSO housing from the City's ever-dwindling supply. By providing a monetary option, the City prejudices members of the public when accepting a buy out from an applicant; resulting in NO BENEFIT for the community.

Furthermore, even if a handful of affordable units are built, the City has no enforcement mechanism and the Housing Department provides no oversight to ensure these units go to those actually in need of affordable housing.

Section 5 of Measure JJJ provides that projects with 10 or more residential dwelling units must, in order to be eligible for "a discretionary General Plan amendment... or any zone change or height-district change that results in increased allowable residential floor area, density or height, or allows a residential use where previously not allowed," the project must comply with various affordable housing requirements (including on or off site), and "shall comply with the job standards in subdivision (i)."
The job standards require that all work be performed by licensed contractors, that at least 30 percent of the workforce is a resident of the City, that 10 percent of the workforce is "transitional worker" living within a 5-mile radius of the project, and that the workers are paid the standard prevailing wages in the project area. What is the DCP's plan to enforce this provision and what measures will be taken to ensure compliance (other than the applicant "promising" or saying so)? Furthermore, the applicant has listed "Owner-Builder" on his application. What do the "Guidelines" say about that? Given the applicant's problematic history as an employer (described below under "City Attorney's Prosecution of Applicants"), what is the DCP's plan to enforce this provision?

"TOC GUIDELINES" MUST NOT SUPPLANT THE CHARTER CODE"
DCP erred by giving "Guidelines" priority over Charter Code

1. Failure to comply with Los Angeles Charter Code ("Charter") Sec 555, 558
   a. The DCP TOC projects must be measured against the City Charter and General Plan, which are the fundamental directives for growth in Los Angeles. **The TOC "Guidelines" are meant to SUPPORT - not SUPPLANT - existing zoning code.** The use of the term "Guidelines" indicates that the use is lawful under the zoning code and development standards incorporated into the code. By changing the development standards incorporated into the City's zoning law, a conflict with the City's general plan is obvious. "The Planning and Zoning Law itself precludes consideration of a zoning ordinance which conflicts with a general plan as a pro tanto repeal or implied amendment of the general plan. **The general plan stands.**" (Lesher, 1990), (deBottari v. City Council (1985) 171 Cal. App. 3d 1204, 1212 [217 Cal. Rptr. 790]; Sierra Club v. Board of Supervisors (1981) 126 Cal. App. 3d 698, 704 [179 Cal.Rptr. 261])

In reality, the TOC program has proven to be in violation of the provisions of Charter Section 558 (b)(2) which **requires the CPC make a finding** "**in conformity with public necessity, convenience, general welfare, and good zoning practice.**" However, the CPC is not able to make ANY "finding" under the Charter in regards to TOC's because they were never codified by the City Council, as mandated by the Charter.

The Charter assumes that variances are done on a site specific project-by-project basis; not by way of a generalized zoning law revision. Under LAMC section 12.32, CPC recommendations must conform with public necessity, convenience, general welfare and good zoning practice. Despite the erroneous approvals as seen here that have proven to conflict with this section (failing to meet the needs of public necessity, convenience, general welfare and is clearly bad zoning practice), the DCP continues to inappropriately initiate changes that circumvent the procedures that are in place as described in LAMC 12.32 below:

"LAMC SEC. 12.32. LAND USE LEGISLATIVE ACTIONS

C. Action on the Initiation or Application.

2. Procedure for Initiated Changes. (Amended by Ord. No. 173,754, Eff. 3/5/01.)

The Director shall make a recommendation for action on the matter, which recommendation shall then be heard by the Planning Commission. Before making a recommendation, the Director may direct a Hearing Officer to hold a public hearing and make a report and recommendation. After receipt of the Director's recommendation, **the Planning Commission shall hold a public hearing and make a report and recommendation to the Council regarding the relation of the proposed land use ordinance to the General Plan and whether adoption of the proposed land use ordinance will be in conformity with public necessity, convenience, general welfare and good zoning practice.** If the matter was initiated by either the City Planning Commission or the Director, and the City Planning Commission recommends denial of the proposed land use ordinance, the decision is final. After the Planning Commission has made its report and recommendation for approval, or after the time for it to act has expired, the Council may consider the matter."

The Planning Department's adoption of these "Guidelines" clearly remains **in direct conflict with the City Charter**. The fact that the TOC "Guidelines" omitted this required finding is what contravenes the Charter. Approvals such as this one demonstrate how the DCP continues to ignore the controls built into the system in order for them to grant illegal projects. Failure to recognize the precedence and authority of the City Charter and the General Plan leads to chaotic, irresponsible growth, fueling gentrification and displacement and ignoring the needs of the community.

The Court holding in Lesher vs. City of Walnut Creek (1990) 52 Cal. 3d 551 held that **voter passed (zoning) initiatives which conflict with the general plan are void**. The court held that the measure in question, "on its face, **regulates land use**. As such it resembles a zoning ordinance, not simply a statement of policy to govern future regulations". (Lesher, 1990). The TOC "Guidelines" used to push this project are not a free pass to bypass the General Plan and all of its elements; the supposed "blue print for the future" (General Plan Overview). However, the DCP has attempted to do just that.

2. The DCP erred by approving this project using the "TOC Guidelines" (adopted by this very Commission) to adopt "zoning variances" to give away a 50% density increase and other TOC entitlements, **none of which can be approved if there is an adverse impact to public health and safety**, established earlier in this document. Evidence has been provided on multiple occasions proving there is no public necessity in this neighborhood for this project, in addition to the site being inappropriate and both community and experts have spoken as to it not being in conformity with general welfare and good zoning practice.

CITY ATTORNEY'S PROSECUTION OF APPLICANTS

A conflict exists between the applicant and the City of Los Angeles. Looking at the record, it is ironic that these applicants are the same individuals who **prosecuted for wage theft, falsification of records and employee intimidation**. AYM Investment, LLC (the applicants) are property owners Yooseff and Masoud Michael Aminpour. Non-constituents of the City of Los Angeles, they operate under several other LLC's such as CALIFORNIA FOOD MANAGEMENT, LLC, A.J.M.F. ENTERPRISES INC., PROGRESSIVE MANAGEMENT, LB and JAM GROUP, LLC. In 2018, the Aminpours were embroiled in a lawsuit pursued by Los Angeles City Attorney Mike Feuer in a case involving wage theft and other abuses, after employees at two car wash locations informed authorities they were being paid as little as $4.50 an hour. A 2018 article reports the City Attorney confirming the Aminpour's "**falsified records in an attempt to deny these allegations**". Although the original penalty was 1 million dollars, Feuer added **an extra half million for witness intimidation and falsifying records**, ultimately ordering the Aminpours to pay a total of 1.5 million. According to Feuer, this is believed to be "the most significant amount ever paid in restitution to car wash workers here in Los Angeles."

This is relevant because when the City approves proposals such as this one, they are inviting the applicant's business ethics and code of conduct into our neighborhood. The DCP is entrusted with the responsibility of **endorsing this applicant as a new member of our community**, and sending a message to residents that they will benefit from a project which addresses the needs of the specific neighborhood. Do the Aminpour merit these entitlements and approvals? **We say NO**.

CONFLICT OF INTEREST WITH CITY PLANNING COMMISSION

"City Charter Code Sec. 551. City Planning Commission.
(a) give advice and make recommendations to the Mayor, Council, Director of Planning, municipal departments and agencies with respect to City planning and related activities and legislation; (b) make recommendations concerning amendment of the General Plan and proposed zoning ordinances in accordance with Sections 555 and 558; (c) make reports and recommendations to the Council and to other governmental officers or agencies as may be necessary to implement and **secure compliance with the General Plan**; and (d) perform other functions prescribed by the Charter or ordinance."

Not only does the CPC appear to be the inappropriate body to hear this appeal (having had hands in drafting the "Guidelines" many of which are the subject of this appeal), but its Commission as seen below is comprised of:

- A President who is VP of a privately held **real estate** investment firm (Millman)
- A principal in a privately held investment company responsible for **real estate** investments and lending throughout California (Choe)
- Executive Officer for LA County Metropolitan Transportation Authority for **Transit Oriented Communities** (Hornstock)
- Previous **employee** for the City of Living Cities and **U.S. Department of Housing & Urban Development** (Leung)
- (no known conflict) (Mack)
- A **real estate** and transaction attorney (Perlman)
- Los Angeles **architect** & partner in architect firm & previous construction administrator (Dake Wilson)

...and have serious conflicts of interests that further prejudice appellate and members of the public.

This Commission has routinely denied **every appeal filed** by members of the public in 2021. This discriminatory track record shows no evidence of the CPC's ability to take an objective position. By rubber stamping **EVERY** Categorical Exemption wherein CEQA has been forced silent, this Commission has repeatedly and erroneously concluded that no TOC project within their purview has ***ever*** had a significant impact on the environment.

In addition, the other glaring conflict of interest is the fact that this Commission "approved" and took part in preparing what is called the "TOC Guidelines" themselves! By these accounts, the CPC is routinely disinclined from voting as an objective body. Appellants and the public are **further harmed and prejudiced** by what will be the rubber denial stamp to this appeal.

LETTER OF DETERMINATION ("LOD") CITES WRONG CODE
DCP erred by putting the incorrect code section on the LOD related to appeals

The DCP's August 26, 2021 Letter of Determination states:

> "Per Section 12.22-A,25(f) of the LAMC, appeals of Density Bonus Compliance Review cases are heard by the City Planning Commission."

The DCP has caused prejudice against members of the public including potential appellants by citing the incorrect code section, unrelated to appeals. After learning this was *another* err made by the DCP, we located LAMC Section 12.22A25(g)2(i)(f), which *appears* to be the code section the DCP is relying on for this appeal. However, there is no clear code section that specifically relates to which body has the authority to hear TOC appeals. **There does not appear to be a legally defined process for the TOC "Guidelines" regarding appeals**. As seen below, this section points to LAMC 11.5.7 C.6:

Pursuant to LAMC Section 12.22-A,25(f), only abutting property owners and tenants can appeal the Transit Oriented Communities Affordable Housing Incentive Program portion of this determination. Per the Density Bonus Provision of State Law (Government Code Section §65915) the Density Bonus increase in units above the base density zone limits and the appurtenant parking reductions are not a discretionary action and therefore cannot be appealed. Only the requested incentives are appealable. Per Section 12.22-A,25 of the LAMC, appeals of Density Bonus Compliance Review cases are heard by the City Planning Commission.

The time in which a party may seek judicial review of this determination is governed by California Code of Civil Procedures Section 1094.6. Under that provision, a petitioner may seek judicial review of any decision of the City pursuant to California Code of Civil Procedure Section 1094.5,

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LAMC Section 12.22A25(g)2(i)(f)

> f. Appeals. (Amended by Ord. No. 182,106, Eff. 5/20/12.) An applicant or any owner or tenant of a property abutting, across the street or alley from, or having a common corner with the subject property aggrieved by the Director's decision may **appeal the decision to the City Planning Commission pursuant to applicable procedures set forth in Section 11.5.7 C.6. of this Code that are not in conflict with the provisions of this paragraph (g)(2)(i)**. The appeal shall include a filing fee pursuant to Section 19.01 B. of this Code. Before acting on any appeal, the City Planning Commission shall set the matter for hearing, with written notice of the hearing sent by First Class Mail at least ten days prior to the meeting date to: the applicant; the owner(s) of the property involved; and the interested parties who have requested notice in writing. The appeal shall be placed on the agenda for the first available meeting date of the City Planning Commission and acted upon within 60 days from the last day of the appeal period. The City Planning Commission may reverse or modify, in whole or in part, a decision of the Director. The City Planning Commission shall make the same findings required to be made by the Director, **supported by facts in the record**, and indicate why the Director erred making the determination.

LAMC Section 11.5.7C6 (SEC. 11.5.7. SPECIFIC PLAN PROCEDURES.)

C. Project Permit Compliance Review - Director of Planning With Appeal to the Area Planning Commission.

6. Appeals.

(a) **Filing of an Appeal.** An applicant or any other person aggrieved by the Director's decision may appeal the decision to the Area Planning Commission. The appeal shall be filed within 15 days of the date of mailing of the Director's decision on forms provided by the Department.
The appeal shall set forth specifically the points at issue, the reasons for the appeal, and the basis upon which the appellant claims there was an error or abuse of discretion by the Director. Any appeal not filed within the 15-day period shall not be considered by the Area Planning Commission. The filing of an appeal stays proceedings in the matter until the Area Planning Commission has made a decision. Once an appeal is filed, the Director shall transmit the appeal and the file to the **Area Planning Commission**, together with any reports responding to the allegations made in the appeal.

LAMC points to 11.5.7 C 6 which are procedures for specific plan appeals to the Area Planning Commission. It is unclear as to how this relates to the filing of an appeal for a "TOC". Providing incorrect code sections and inaccurate information causes harm to the public's appeal rights.

"THE GENERAL PLAN STANDS" (Lesher, 1990)

In its Executive Summary of the City of Los Angeles' Framework Element, the City falsely and incorrectly cites California Code section 65300, by claiming the City "adopt a comprehensive, long-term general plan for its *future* development."
What the code section really says is: "long-term general plan for **the physical** development of the city…" It is misstatements like this that continue to show community members the message you are trying to send, as illegal projects such as this, are wrongfully approved.

The DCP has misstated and omitted material information that directly affects the safety and general welfare of this Cities citizens. The DCP's approval fails on all levels, to comply with the City's General Plan, some of which includes KEY POLICIES such as:

- "Revise, as necessary, community plans to facilitate the conservation of the scale and character of existing stable residential neighborhoods" (The Framework Element/Housing)
- "Plan for appropriate increases in housing production **in appropriate**

areas as determined through the community plans and implementing actions in conformance with the California Environmental Quality Act (CEQA)" (The Framework Element/Housing).

- "**California State law requires that the day-to-day decisions of a city follow logically from and be consistent with the general plan.** More specifically, Government Code Sections 65860, 66473.5 and656474 require that zoning ordinances and subdivision and parcel map **approvals be consistent with the general plan.**"

- "The final determination about **what is appropriate locally** will be made through the community plans" (General Plan System)
- "it has developed this Element to establish policies to best accommodate this growth **when** and **if** it should occur."

Some examples of goals described in the City's General Plans HOUSING POLICY include:

- "**preserving existing** residential neighborhood stability"
- "**protecting** and **preserving** surrounding low-density neighborhoods from the encroachment of incompatible land uses."
- "A City of residential neighborhoods that maintains a sense of community **by conserving and improving existing housing stock**"

As noted in the Elysian Valley Community Plan (the community Stires falls under), known issues include:

- "**Loss of existing affordable housing**"
- "**Cumulative effects** of new development and increasing density on infrastructure capacity and public services."
- Residential **development that is insensitive to or incompatible** with the plan area's unique natural, topographical, architectural, l cultural and historic features."
- "...large developments that are **incompatible with size, scale and design of neighborhoods and which threaten existing affordable housing.**"

Being that the courts have found "THE GENERAL PLAN TO STAND", and in combination of all the evidence that exists in the record in this case, it could not be more clear to anyone reading this document and the evidence in the record, that the DCP indisputably erred.

SLHT DENIED DUE PROCESS AND EQUAL PROTECTION

On September 9, 2021, The Silver Lake Heritage Trust was twice denied our right to appeal this project. Attached hereto as **ATTACHMENT C** are copies of the email exchanges wherein the DCP refused to accept our appeal application (amongst other issues), in violation of due process & equal protection clauses of the U.S. Constitution. This action constitutes an unjust and inequitable denial of standing to appeal a TOC decision to the L.A. City Council. By denying our right to appeal, the DCP has harmed our organization by compromising our ability to exhaust our legal remedies.

The Fourteenth Amendment:
Our Constitutional Rights under the U.S. Constitution which prevents the enforcement of any law that deprives “any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.” (Amendment XIV (1868) Section 1)).

The provisions in the TOC “Guidelines” which seek to limit the filing of appeals to tenants or adjacent property owners is a violation of the due process and equal protection clause of the 14th Amendment to the US Constitution given that there is no logical or rational basis for limiting appeals of TOC projects to only tenants living in adjacent buildings or to adjacent property owners. The City’s entire protocol regarding who may appeal Director’s land use entitlement decisions in cases involving TOC projects, is without rational basis and denies equal protection to those others who own property or reside or work in the neighborhood, and who by any objective standard, would be directly impacted by the 1251-1259 Sunset project.

The lack of any justifiable distinction between the appellate protocol attendant to TOC appeals and the appellate protocol attendant to VTT appeals renders the limitation on TOC appeals an unconstitutional violation of the peoples due process rights and those similarly situated within the community.

There is further conflict in that the LOD is mailed primarily to abutting property owners, and that list of property owners is generated by developers, not the City. There is NO PUBLIC NOTIFICATION OF THE PROJECT. This is a significant Brown Act violation as it impacts the people’s business and their right to remain informed (CGC 54950.).

Measure JJJ Sec. 7. Enforcement:
Any aggrieved person or resident of the City of Los Angeles shall have the right to maintain an action for equitable relief to restrain any violation of this Ordinance, or City failure to enforce the duties imposed on it by this Ordinance. The provisions of this Act shall be construed liberally to effectuate its intent and purposes.
Here, Measure JJJ Section 7 allows for ANY AGGRIEVED PERSON to pursue an action to restrain the City from further violating the Ordinance.

We respectfully request the evidence in the record be read.

We respectfully request the appeal be granted in order to prevent the unnecessary, avoidable and time consuming litigation process.

Thank you,

The Silver Lake Heritage Trust

DEFINITIONS

“**A direct physical change in the environment**” is a physical change in the environment which is caused by and immediately related to the project. Examples of direct physical changes in the environment are the dust, noise, and traffic of heavy equipment that would result from construction of a sewage treatment plant and possible odors from operation of the plant (CCR 15064(d)(1)).

“**Cumulative impacts**” refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts (CCR 15255).

“**Environment**” means the physical conditions which exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, objects of historic or aesthetic significance (PRC 21060.5.)

“**Historical Resources**”
(SEE CEQA GUIDELINES SEC 15064.5).

“**Significant effect on the environment**” means a substantial, or potentially substantial, adverse change in the environment (PRC 21068).

“**Specific Adverse Impact** - a significant, quantifiable, direct, and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete.” (LAMC 12.22 25(b))

PRC 21082.2, substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts.

(d) If there is substantial evidence, in light of the whole record before the lead agency, that a project may have a significant effect on the environment, an environmental impact report shall be prepared.

ECHO PARK NEIGHBORHOOD COUNCIL

CERTIFIED NEIGHBORHOOD COUNCIL
APRIL 16, 2002

Chief Information Officer:
Sachin Medhekar
Treasurer:
Michael Galano
Secretary:
Devin McCutchen

Letter of Opposition for DIR-2018-6634-TOC 1251 W. Sunset Blvd

TELEPHONE: 323 487 9124
WEBSITE: echoparknc.com
EMAIL: info@echoparknc.com
MAILING ADDRESS
1226 Alvarado St.
LOS ANGELES, CA 90026

February 26, 2019
VIA EMAIL
Los Angeles City Planning Department
Office of Zoning Administration
Attn: Joann Lim

Re: Case No. DIR-2018-6634-TOC

On 2/26/2019, the Echo Park Neighborhood Council (EPNC) held a Brown Act noticed-meeting and resolved to oppose the proposal for a new construction at 1251 W. Sunset Blvd, L.A., CA 90026, Zoned C2-1VL. The 5-story, 70-unit residential-apartment building will set aside 7-units for extremely low-income households and sit over 2-levels of parking with 35 required parking spaces. Traffic study completed (DOT Case Cen 18-47028).

EPNC is in **opposition** to the Transit Oriented Communities (TOC) Tier-1 pursuant to LAMC section 12.22.A 31 to allow 3 additional on-menu incentives for a height increase, and reductions of one side yard and rear yard.

EPNC is in **opposition** to project based insufficient outreach including to current residents, excessive height and grading, lack of necessary parking for the area and misapplication of TOC Tier-1 designation to this location, and the project resulting in loss net of affordable housing; at a minimum, the project should include at least 17 affordable units (including studios) to replace the loss of 10 affordable units housing families and multiple residents.

Hilltop residents living directly above proposed project expressed concerns for the safety of their dwellings in terms of the vast amount of projected grading involving this project on Sunset Blvd.

ATTACHMENT A

ECHO PARK NEIGHBORHOOD COUNCIL
Letter of Opposition for DIR-2018-6634-TOC
February 26, 2019

Resolution

On Feb 26, 2019, the EPNC met at The Echo Park United Methodist Church located at 1226 N. Alvarado Street, Los Angeles CA 90026. With a quorum of 18, the EPNC voted to oppose DIR 2018-6634-TOC with 17 Yeas, 0 Nays, 0 Abstentions, and 1 Ineligible.

Respectfully yours,

Devin McCutchen
Secretary, Echo Park Neighborhood Council

ATTACHMENT A

ECHO PARK

NEIGHBORHOOD COUNCIL

CHAIR
Mansoor Khan

VICE CHAIR
Danielle Davis

CHIEF INFORMATION OFFICER
Mark Vigeant

TREASURER
Dave Hunter

SECRETARY
Nick Marcone

CERTIFIED COUNCIL
APRIL 16, 2002

1226 N ALVARADO ST
LOS ANGELES, CA 90026

(323) 487-9124

INFO@ECHOPARKNC.COM
WWW.ECHOPARKNC.COM

Letter of Support for the Appeal of DIR-2018-6634-TOC, CEQA: ENV-2018-6635-CE

SEPTEMBER 30, 2021

VIA EMAIL

THE CITY PLANNING COMMISSION, ATTN: CPC@LACITY.ORG

CASE NUMBER: **DIR-2018-6634-TOC**
CEQA: **ENV-2018-6635-CE**

For the past 2.5 years, The Echo Park Neighborhood Council (EPNC) has continually and repeatedly opposed the 5-story, 70-unit Transit Oriented Communities (TOC) project at 1251-1259 W. Sunset Blvd., commonly referred to as the Stires Staircase Bungalow Court. We submit this letter in support of the appeal brought against this project by adjacent neighbor Richard Courtney.

In February of 2019, the EPNC sent the **attached letter** to the Planning Department in opposition to the project, as it is clearly not in the best interests of the constituents of Echo Park, the majority of whom are legacy residents of rent stabilized housing. The Department of Planning approval will not only **displace,** but **reduce** the number of RSO housing stock in Echo Park. The simple arithmetic below demonstrates that your endorsed elimination of **TEN** existing and truly affordable RSO dwellings (well below market rate), will serve to accelerate our neighborhood's critical shortage of affordable housing in the midst of a city-wide housing emergency. Despite the planned additional units, this project will yield only 10% (7 units) of low-income housing, with 90% of the apartments pegged as market rate rentals. The project **fails to replace three** of the would-be demolished **ten** low-income RSO units, and **will immediately result in a 30% reduction of the current number of affordable units on the site.**

The developer is claiming all the benefits of the TOC, while failing to provide the required replacement housing, thus abdicating the affordable housing requirements

mandated by the TOC guidelines. **This fact ALONE should disqualify the project from claiming TOC entitlements and exemptions, as it FAILS to replace ALL EXISTING LOW-INCOME UNITS.**

Echo Park is in dire need of rental housing stock that is affordable to the many seniors and disabled residents who are barely surviving on fixed incomes, for immigrant families who are compelled to live in overcrowded units because they cannot afford larger, more adequate space, and for our **essential** working-class neighbors, many of whom pay more than 50% of their net income for rent due to the gentrification fueled by decisions such as this one. Make no mistake, because of the Planning Department's rubber-stamping of market-rate developments like this one, you are exacerbating a crisis that will result in displacement and other community-damaging negative impacts imposed on the most vulnerable among us, with untold repercussions across the City for decades.

Moreover, this "Transit Oriented" project ironically ensures that those low-income families who rely on public transportation will lose their current access to it, in favor of wealthy residents with multiple transportation options.

Furthermore, the Planning Department has made this ill-considered decision, which requires the demolition of the existing TEN bungalows, despite the recommendation from the Cultural Heritage Commission to designate the Stires Staircase Bungalow Court for Historic Cultural Monument (HCM) status on all three available criteria, as an important historic resource.

The job of the Planning Department is to approve or deny these proposals based on needs of the specific community according to the **general and specific plan**. This project does not comport with the needs of this community, and your continued approval ignores the valid and important objections from the many stakeholders who have spoken out against this project. You must not approve projects that contribute to the appalling paucity of affordable housing units for working class families. As representatives of the Echo Park community, the EPNC continues to oppose the approval and support this appeal on behalf of the community and the current tenants of the property commonly referred to as the Stires Staircase Bungalow Court.

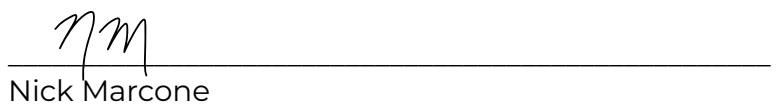
ATTACHMENT B

NM

RESOLUTION

On September 28, 2021, the EPNC Board of Governors held a Brown Act noticed-meeting, at 7pm through zoom. With a quorum of 14 board members present and a vote count of 14 yeas, 0 nays, and 0 abstentions, the Board resolved to write a letter of support for the application as set forth above.

Respectfully,
Echo Park Neighborhood Council



Nick Marcone
Secretary, Echo Park Neighborhood Council

CC:
COUNCIL DISTRICT 1, ATTN: GILBERT CEDILLO, GILBERT.CEDILLO@LACITY.ORG

ATTACHMENT B