



DEPARTMENT OF CITY PLANNING

APPEAL RECOMMENDATION REPORT

City Planning Commission

Date: January 11, 2024
Time: After 8:30 a.m.*
Place: Los Angeles City Hall
Council Chambers, Room 340
200 North Spring Street
Los Angeles, CA 90012

And via Teleconference. Information 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.

Public Hearing: Required
Appeal Status: Not further appealable.
Expiration Date: January 11, 2024
Multiple Approval: Yes

Case No.: DIR-2022-2279-TOC-SPR-VHCA-1A
CEQA No.: ENV-2022-2280-SCEA
Related Cases: N/A
Council No.: 5 – Katy Young Yaroslavsky
Plan Area: Wilshire Community Plan
Specific Plan: N/A
Certified NC: P.I.C.O.
Zone: C2-1-O

Applicant: 1050 La Cienega, LLC

Applicant's Representative: Dave Rand, Rand Paster Nelson LLP

Appellant(s): 1) Coalition for Responsible Equitable Economic Development (CREED) LA
2) Friends of South Carthay
3) Andrew Marton
4) Elana Shrira

Appellant's Representative(s): 1) Aidan P. Marshall, Adams Broadwell Joseph & Cardozo
2) Jamie T. Hall, Channel Law Group, LLP
3) N/A
4) N/A

PROJECT LOCATION: 1022-1066 South La Cienega Boulevard

PROPOSED PROJECT: The project involves the construction, use, and maintenance of a new 24-story mixed-use residential and commercial building with 290 units, including 29 units reserved for Extremely Low Income households, and approximately 4,100 square feet of commercial space on the ground floor, on a currently vacant parcel of land. The project proposes to provide 412 vehicle parking spaces.

APPEALS: 1) One appeal in part of the Director of Planning's determination which approved with conditions, pursuant to Section 12.22 A.31 of the Los Angeles Municipal Code (LAMC), a 45 percent increase in density and an increase in floor area ratio (FAR) to a maximum of 3.75:1, consistent with the provisions of the Transit Oriented Communities (TOC) Affordable Housing

Incentive Program, along with the following one (1) Additional Incentive for a qualifying Tier 3 project totaling 290 dwelling units, reserving a minimum of 29 units for Extremely Low Income (ELI) Household occupancy for a period of 55 years:

- a. Yards/Setbacks. Utilization of the side yard setback requirements of the RAS3 Zone for a project in a commercial zone; and
- 2) Four appeals of the entirety of the Director of Planning's determination which approved, pursuant to LAMC Section 16.05, a Site Plan Review for a development creating 50 or more residential dwelling units.

RECOMMENDED ACTIONS:

- 1) **Find** based on the whole of the record and in an independent judgment, the project was analyzed in the Sustainable Communities Environmental Assessment No. ENV-2022-2280-SCEA ("SCEA") adopted by the City Council on November 22, 2022, and adopt the mitigation measures and Mitigation Monitoring Program for the project;
- 2) **Find** that the City Council previously held a public hearing and adopted the SCEA on November 22, 2022; that the Applicant subsequently proposed minor changes to the Project, which include moving the tower structure south on the Project Site, reducing its height, reducing the commercial development, increasing open space, and reducing the parking count (the Revised Project); that as supported in the whole of the record, the changes proposed in the Revised Project do not affect the analyses or significance conclusions set forth in the SCEA, nor do the minor changes trigger any of the circumstances in CEQA Guidelines section 15073.5 that would require recirculation; that all mitigation measures have been incorporated into the project conditions of approval; and adopt the SCEA findings adopted by the City Council as those of the City Planning Commission;
- 3) **Deny in part and Grant in part** the appeals to incorporate modified Conditions of Approval; and
- 4) **Sustain** the determination by the Director of Planning to conditionally approve a 45 percent increase in density, consistent with the provisions of the Transit Oriented Communities (TOC) Affordable Housing Incentive Program along with the following one (1) incentive for a qualifying Tier 3 project totaling 290 dwelling units, reserving a minimum of 29 units for Extremely Low Income (ELI) Household occupancy for a period of 55 years:
 - a. Yards/Setbacks. Utilization of the side yard setback requirements of the RAS3 Zone for a project in a commercial zone Site Plan Review for a development creating 50 or more residential dwelling units; and
 - a Site Plan Review for a development creating 50 or more residential dwelling units.

VINCENT P. BERTONI, AICP
Director of Planning



Heather Bleemers
Senior City Planner



More Song
City Planner

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 week prior to the Commission's meeting date. If you challenge these agenda items in court, you may be limited to raising only those issues you or someone else raised at the public hearing agendized herein, or in written correspondence on these matters delivered to this agency at or prior to the public hearing. As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability, and upon request, will provide reasonable accommodation to ensure equal access to these programs, services and activities. Sign language interpreters, assistive listening devices, or other auxiliary aids and/or other services may be provided upon request. To ensure availability of services, please make your request not later than three working days (72 hours) prior to the meeting by calling the Commission Secretariat at (213) 978-1299.

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- Exhibit C – Approved Project Plans
- Exhibit D – Environmental Documents (ENV-2022-2280-SCEA)
Supplemental Memo

PROJECT ANALYSIS

PROJECT SUMMARY

The proposed project involves the approval of a Tier 3 Transit Oriented Communities (TOC) Affordable Housing Incentive Program development project with Base Incentives for a 45 percent increase in density and an increase in floor area ratio (FAR) to a maximum of 3.75:1, as well as a Site Plan Review. The proposed development is a new 24-story, approximately 272 feet-high mixed-use residential and commercial building with 290 residential units above approximately 4,100 square feet of commercial space on the ground floor, as depicted below in Figure 1. Of these, 29 units will be set aside for Extremely Low Income households for 55 years, pursuant to the TOC Guidelines. The project is not required to provide any vehicle parking, pursuant to the provisions of Assembly Bill (AB) 2097 (2022); nonetheless, the project proposes to provide a total of 412 automobile parking spaces in one subterranean parking level and on portions of the ground floor, second floor, and third floor, for both the residential and commercial uses. The project will also provide 164 long-term bicycle parking spaces and 20 short-term bicycle parking spaces. The project proposes to provide approximately 51,517 square feet of open space to meet the requirements of the TOC program and the LAMC, divided between outdoor spaces on the ground floor, outdoor spaces on the third floor, a rooftop deck, and various interior amenity spaces and common rooms. The project will maintain a front yard setback of zero feet along La Cienega Boulevard, northerly and southerly side yard setbacks of 30 feet and five feet respectively (in lieu of the otherwise required 16 feet, as permitted by an Additional Incentive to utilize the southerly side yard setback requirements of the RAS3 Zone), and an easterly rear yard setback of 28 feet.

Figure 1: Rendering of the proposed project



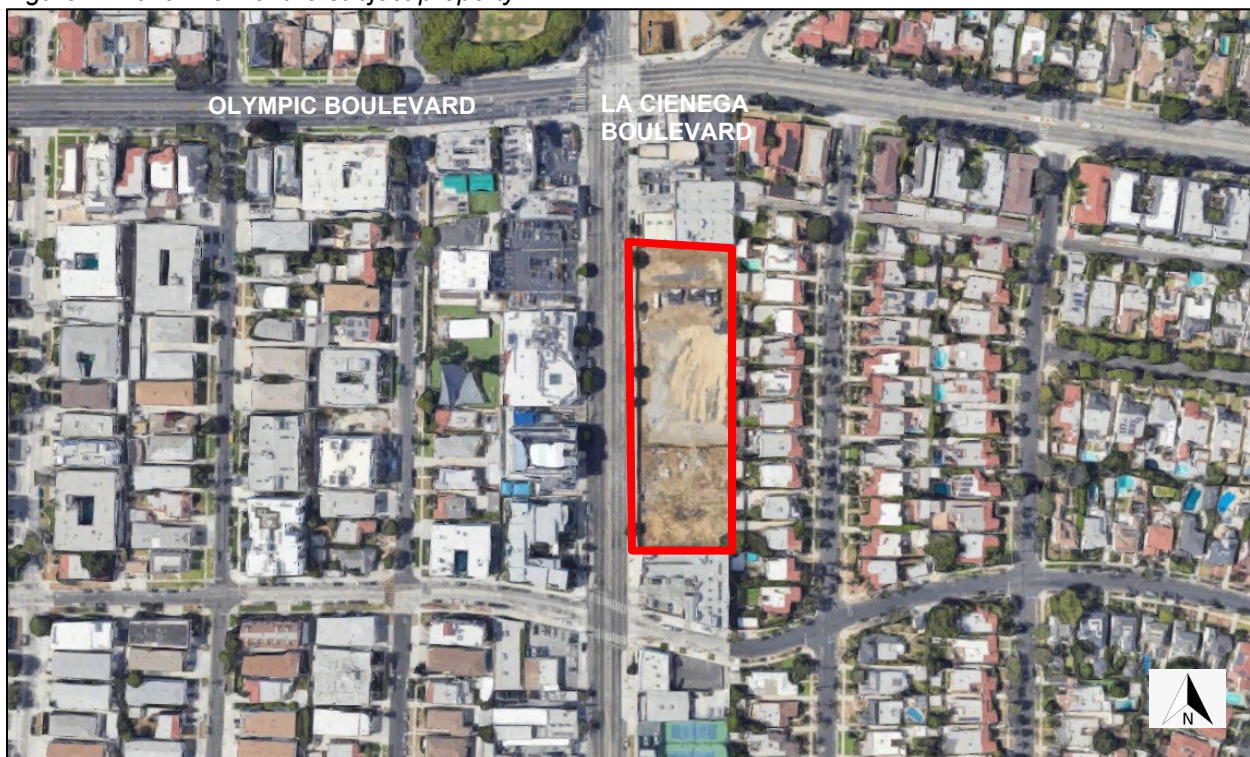
PROJECT BACKGROUND

The subject property is currently vacant and consists of 11 contiguous lots encompassing a total of approximately 79,624 square feet of lot area. The property is rectangular-shaped and is located mid-block along the eastern side of La Cienega Boulevard, between Olympic Boulevard to the north and Whitworth Drive to the south, with a street frontage of approximately 500 feet.

The project site is located within the Wilshire Community Plan and is zoned C2-1-O with a corresponding land use designation of General Commercial. The project site is also located within a Transit Priority Area within the City of Los Angeles. The property is not within the boundaries of any other specific plan or interim control ordinance.

The subject property is located in an established and heavily urbanized neighborhood in central Los Angeles. The surrounding area consists primarily of commercially-developed arterial corridors surrounded by residential neighborhoods. Immediately abutting the project site are one-story commercial automotive uses to the north, two-story multi-family residences to the east, a three-story commercial shopping center to the south, and mid-rise buildings comprising the Temple Beth Am and Pressman Academy private school to the west across La Cienega Boulevard. Figure 2 below shows the subject property and its environs.

Figure 2: Aerial view of the subject property



Streets

La Cienega Boulevard, adjoining the subject property to the west, is a designated Avenue I, with a designated right-of-way width of 100 feet. Along the subject property's street frontage, La Cienega Boulevard is currently dedicated to a total right-of-way width of 100 feet and improved with curb, gutter, and sidewalk.

APPROVED ACTIONS

On September 21, 2023, the Director of Planning took the following actions:

1. Found, based on the whole of the record and in their independent judgment, the project was analyzed in the Sustainable Communities Environmental Assessment No. ENV-2022-2280-SCEA (“SCEA”) adopted by the City Council on November 22, 2022, and adopt the mitigation measures and Mitigation Monitoring Program for the project;
2. Approved with Conditions a 45 percent increase in density, consistent with the provisions of the Transit Oriented Communities (TOC) Affordable Housing Incentive Program along with the following one (1) incentive for a qualifying Tier 3 project totaling 290 dwelling units, reserving a minimum of 29 units for Extremely Low Income (ELI) Household occupancy for a period of 55 years:
 - a. Utilization of any/all of the yard/setback requirements of the RAS3 Zone for a project in a commercial zone; and
3. Approved a Site Plan Review for a development creating 50 or more residential dwelling units.

APPEAL SCOPE

Four separate appeals were filed opposing the Director of Planning’s determination: Appeal 1, filed by Aidan P. Marshall of the Adams Broadwell Joseph & Cardozo law firm on behalf of the Coalition for Responsible Equitable Economic Development (CREED) LA; Appeal 2, filed by Jamie T. Hall of Channel Law Group on behalf of Friends of South Carthay; Appeal 3, filed by Andrew Marton, a neighboring resident; and Appeal 4, filed by Elana Shrira, a neighboring resident. Of the four appeals, only Appeal 4 was filed by an abutting resident/property owner; pursuant to the TOC Guidelines and Sections 12.22 A.25 and 12.22 A.31 of the LAMC, TOC base incentives, including density and FAR, are not appealable, and additional incentives listed in the TOC Guidelines are only appealable by abutting property owners and residents. Accordingly, Appeal 4 is an appeal of the Director of Planning’s approval of the TOC additional incentive as well as Site Plan Review, while Appeals 1, 2, and 3 are only of the Site Plan Review approval. The project’s environmental clearance is a Sustainable Communities Environmental Assessment (SCEA) under Case No. ENV-2022-2280-SCEA; the SCEA was fully approved and adopted by the City Council on November 22, 2022, and therefore is final and no longer open for discretionary review.

As the case is a multiple-approvals case involving a TOC request, the appellate body is the City Planning Commission; the decision of the City Planning Commission is not further appealable.

The applicant submitted a response to the appeals, dated December 22, 2023, summarizing and rebutting the appeal points, as well as updated appendices to the SCEA analyzing the project’s proposed changes and any additional potential environmental impacts. Planning has reviewed all of the appeal points as well as the applicant’s response submittal and concludes that there is no merit to any of the appeals. The appeals are summarized briefly as follows:

APPEAL 1: CREED LA

The Adams Broadwell Joseph & Cardozo law firm filed an appeal on behalf of CREED LA opposing only the Site Plan Review portion of the Director of Planning’s determination. The

appellant contends that the Director of Planning improperly approved the Site Plan Review request for the project because the Director of Planning did not also approve the project's environmental clearance (SCEA) concurrently, and because the project would be inconsistent with the General Plan due to alleged air quality and noise impacts. However, the City Council previously found that the SCEA adequately analyzed all potential impacts and concluded that there would be no significant impacts with mitigation incorporated. Accordingly, as the SCEA was fully approved and adopted by the City Council, the Director of Planning did not need to readopt the SCEA when the entitlements were approved. Furthermore, as the SCEA concluded that the project would comply with all applicable regulatory requirements and would not result in any significant impacts, the finding that the project would be substantially consistent with the General Plan can be made in the affirmative, supporting the Director of Planning's approval of the Site Plan Review entitlement. There is no substantial evidence in the record that indicates the project would be specifically inconsistent with the General Plan. Nonetheless, the applicant's environmental consultant has prepared a supplemental memo dated August 3, 2023 which outlines and analyzes all of the changes the project has undergone since initial analysis in the SCEA; in summary, as the project is smaller than previously proposed and analyzed, the project will not have any additional impacts beyond those previously analyzed, and no additional environmental review is necessary.

Appeal 1 further comments that the City Council did not properly approve and adopt the SCEA because it held a public hearing before the Planning and Land Use (PLUM) committee instead of the full legislative body. Again, this appeal point is moot because the SCEA is fully approved, adopted, and final and is no longer open for discretionary review; nonetheless, the City Council designates the PLUM committee as the legislative body conducting public hearings for such matters, and as such a public hearing was properly held for the SCEA.

APPEAL 2: Friends of South Carthay

Jamie T. Hall of Channel Law Group submitted an appeal on behalf of the Friends of South Carthay organization contending that the Director of Planning improperly granted the density and improperly conditioned the project to allow for future modifications of the project and reduced vehicle parking pursuant to AB 2097, that the findings approving the requested Additional Incentive and Site Plan Review cannot be made, and that the project's SCEA is inadequate.

The appellant alleges that Condition No. 1 in the approved determination letter is improperly vague and gives the Director of Planning the authority to modify the project; however, this is not true, as this condition is specifically written (and is grammatically correct as-is) only to allow for minor deviations in the plans during the permitting process if necessary to comply with applicable regulations and/or as required by any additional Conditions of Approval, as is common with development projects. The appellant further notes that the project was not eligible for the reduced parking provisions of AB 2097; however, AB 2097 became effective on July 1, 2023 (delayed from January 1, 2023). The Director of Planning approved the project on September 23, 2023, after AB 2097 became effective.

The appeal contends that the findings would necessitate denial of the requested TOC Additional Incentive and Site Plan Review. The TOC program, as well as State Density Bonus law upon which the TOC program is based, mandate that additional incentives must be granted unless it is found that the incentive is not necessary to provide for affordable housing costs, or that the incentive will have a specific adverse impact on public health or on any historic resources. Although the appellant argues both, the Additional Incentive is necessary to provide for affordable housing costs and will not have a specific adverse impact on public health or a historic resource. Under the applicable legal standard, requested Incentives are presumed

necessary to provide for affordable housing costs; the appellants have not shown otherwise with any substantial evidence in the record. The project is requesting an Additional Incentive to reduce the otherwise required southerly side yard to five feet¹; this request by nature enables the expansion of the building envelope, which in turn enables the provision of more residential floor area to accommodate the proposed affordable residential units as well as to accommodate more market-rate units which offset the costs of providing the affordable units. The list of Additional 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 types of relief that minimize restrictions on the size of the project. As such, the Director of Planning will always arrive at the conclusion that the Additional Incentives are required to provide for affordable housing costs because the Incentives by their nature increase the scale of the project, allow for design efficiencies, and accommodate the construction of floor area to support the operational costs and construction of the affordable housing units. In addition, there is no substantial evidence in the record of any specific adverse impact on public health or the environment that has not mitigated, and the project will not have any effect on the abutting Historic Preservation Overlay Zone (HPOZ). Similarly, the project complies entirely with the provisions of the TOC program, which permits the outlined deviations from the zoning code, and as such the project substantially conforms with the General Plan.

The appellant also argues that the SCEA is inadequate because the project does not qualify for a SCEA, the SCEA does not identify all significant impacts such as noise, vibration, utility consumption, and aesthetics, and the SCEA does not implement all feasible mitigation measures, including implementing local hire programs. Planning has reviewed all of the appellant's claims and finds no substantial evidence indicating any deficiencies in the SCEA. The project is consistent with the Southern California Association of Governments (SCAG) Regional Transportation Plan (RTP) / Sustainable Communities Strategies (SCS) regional plan and therefore meets the requirements to qualify for a SCEA. The SCEA has appropriately analyzed all potential impacts and has incorporated mitigation measures where necessary, and there is no requirement to require incorporating mitigation measures where there is no identified significant impact and doing so would be infeasible. As the project site is located within a Transit Priority Area, aesthetics is not considered an impact under CEQA, and there is no indication of any specific quantifiable impact to the HPOZ, as such claims by the appellant are speculative. The applicant's environmental consultant's response to the appeal submittals provides further detail and justification, and Planning has reviewed the responses and concurs with the conclusions. In addition, Planning concurs that as all of the proposed changes result in a project that is less intensive than originally analyzed in the SCEA, no additional environmental analysis or circulation is necessary pursuant to CEQA Guidelines Sections 15073.5 and 15088.5.

APPEALS 3 & 4: ANDREW MARTON & ELANA SHRIRA

The justification documents submitted for Appeals 3 and 4 are identical copies of each other and repeat identical arguments as Appeal 2, described above.

PLANNING RECOMMENDED MODIFICATIONS

As a part of the TOC program, the Director of Planning approved a 45 percent increase in density and an increase in FAR to a maximum of 3.75:1 as TOC base incentives, as permissible and outlined in the TOC Guidelines. These requests are disclosed in application materials, discussed in the original determination letter dated September 21, 2023, and reflected in the approved project plans in Exhibit A. However, while the increase in density was specifically

¹ It should be noted that the appeal requests the commission deny the "height incentive"; however, the requested incentive is for a reduced side yard and not height. The proposed height is entirely by-right and not discretionary.

described in the Conditions of Approval in the original determination letter, the increase in FAR was not. It was the Director of Planning's intent to approve the increase in FAR as it is a TOC base incentive and is not a discretionary request. Therefore, in an effort to more clearly describe the base incentives and to avoid future confusion, Planning recommends that Condition 5. C be added to the Conditions of Approval, as follows:

5. Base Incentives:

c. **FAR.** The project shall be permitted a maximum FAR of 3.75:1 for a qualifying Tier 3 project in a commercial zone.

CONCLUSION

For all of the reasons stated herein, and in the findings of the Director's Determination, the proposed project complies with all applicable provisions of the TOC Affordable Housing Incentive Program, Site Plan Review, and CEQA. Although the applicant's arguments for appeal have been considered, Planning maintains that the required findings and imposed conditions of the Director's Determination are valid and that the appeal arguments are not grounds for reversal of any portion of the approval.

Therefore, Planning recommends that the City Planning Commission grant in part and deny in part the appeals of the Director's Determination to incorporate an additional Condition of Approval as described herein, and sustain the Director's Determination for the conditional approval of a TOC Affordable Housing Incentive Program request with one Additional Incentive and Site Plan Review for the proposed project herein.

EXHIBIT A

ORIGINAL APPEALS

APPLICATIONS



APPEAL APPLICATION Instructions and Checklist

RELATED CODE SECTION

Refer to the Letter of Determination (LOD) for the subject case to identify the applicable Los Angeles Municipal Code (LAMC) Section for the entitlement and the appeal procedures.

PURPOSE

This application is for the appeal of Los Angeles City Planning determinations, as authorized by the LAMC, as well as first-level Building and Safety Appeals.

APPELLATE BODY

Check only one. If unsure of the Appellate Body, check with City Planning staff before submission.

- Area Planning Commission (APC) City Planning Commission (CPC) City Council
 Zoning Administrator (ZA) Director of Planning (DIR)

CASE INFORMATION

Case Number: Case Nos. ENV-2022-2280-SCEA; DIR-2022-2279-TOC-SPR-VHCA; SCH No. 2022090143

Project Address: 1022, 1024, 1028, 1034, 1036, 1038, 1044, 1048, 1054, 1056, 1060, 1066 S. La Cienega Boulevard, Los Angeles, CA 90035.

Final Date to Appeal: October 6, 2023

APPELLANT

For main entitlement cases, except for Building and Safety Appeals:

Check all that apply.

- Person, other than the Applicant, Owner or Operator claiming to be aggrieved
 Representative Property Owner Applicant Operator of the Use/Site

For Building and Safety Appeals only:

Check all that apply.

- Person claiming to be aggrieved by the determination made by **Building and Safety**¹
 Representative Property Owner Applicant Operator of the Use/Site

¹ Appellants of a Building and Safety Appeal are considered the Applicant and must provide the Noticing Requirements identified on page 4 of this form at the time of filing. Pursuant to LAMC Section 12.26 K, an appeal fee shall be required pursuant to LAMC Section 19.01 B.2.

APPELLANT INFORMATION

Appellant Name: CREED LA c/o Aidan P. Marshall

Company/Organization: Adams, Broadwell, Joseph & Cardozo

Mailing Address: 601 Gateway Blvd. Ste. 1000

City: South San Francisco State: CA Zip Code: 94080

Telephone: (650) 589-1660 E-mail: amarshall@adamsbroadwell.com

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

Self Other: CREED LA

Is the appeal being filed to support the original applicant's position? YES NO

REPRESENTATIVE / AGENT INFORMATION

Representative/Agent Name (if applicable): Aidan P. Marshall

Company: Adams, Broadwell, Joseph & Cardozo

Mailing Address: 601 Gateway Blvd. Ste. 1000

City: South San Francisco State: CA Zip Code: 94080

Telephone: (650) 589-1660 E-mail: amarshall@adamsbroadwell.com

JUSTIFICATION / REASON FOR APPEAL

Is the decision being appealed in its entirety or in part? Entire Part

Are specific Conditions of Approval being appealed? YES NO

If Yes, list the Condition Number(s) here: All conditions

On a separate sheet provide the following:

- Reason(s) for the appeal
- Specific points at issue
- How you are aggrieved by the decision
- How the decision-maker erred or abused their decision

APPLICANT'S AFFIDAVIT

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

Appellant Signature:  Date: 10/5/2023

GENERAL 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.

The appellate body must act on the appeal within a time period specified in the LAMC Section(s) pertaining to the type of appeal being filed. Los Angeles 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: \$ 166

Reviewed & Accepted by (DSC Planner): J. C. Chan

Receipt No.: 051023039 - 14D24E72 Date: 10/15/23

Determination authority notified Original receipt and BTC receipt (if original applicant)

1000

1000

1000

1000

Applicant Copy
 Office: Downtown
 Application Invoice No: 91219

City of Los Angeles
 Department of City Planning



6800191219



City Planning Request

NOTICE: The staff of the Planning Department will analyze your request and accord the same full and impartial consideration to your application, regardless of whether or not you obtain the services of anyone to represent you.

This filing fee is required by Chapter 1, Article 9, L.A.M.C.

If you have questions about this invoice, please contact the planner assigned to this case. To identify the assigned planner, please the assigned planner, please visit <https://planning.lacity.org/pdiscaseinfo/> and enter the Case Number.

Payment Info: \$204.18 was paid on 10/05/2023 with receipt number 051023039-14D24E72-5859-4CDE-9594-71C694921C2A

Applicant: Coalition for Responsible Equitable Economic Development Los (c/o Darien Key, Adams Broadwell Joseph & Cardozo)
Representative: Jaime T. Hall (c/o Darien Key, Adams Broadwell Joseph & Cardozo)
Project Address: 1060 S LA CIENEGA BLVD, 90035

NOTES:

DIR-2022-2279-TOC-SPR-VHCA-1A			
Item	Fee	%	Charged Fee
Appeal by Person Other Than The Applicant	\$166.00	100 %	\$166.00
Case Total			\$166.00
* Fees Subject to Surcharges			\$166.00
Fees Not Subject to Surcharges			\$0.00
Plan & Land Use Fees Total			\$0.00
Expediting Fee			\$0.00
Development Services Center Surcharge (3%)			\$4.98
City Planning Systems Development Surcharge (6%)			\$9.96
Operating Surcharge (7%)			\$11.62
General Plan Maintenance Surcharge (7%)			\$11.62

* Fees Subject to Surcharges	\$166.00
Fees Not Subject to Surcharges	\$0.00
Plan & Land Use Fees Total	\$0.00
Expediting Fee	\$0.00
Development Services Center Surcharge (3%)	\$4.98
City Planning Systems Dev. Surcharge (6%)	\$9.96
Operating Surcharge (7%)	\$11.62
General Plan Maintenance Surcharge (7%)	\$11.62
Grand Total	\$204.18
Total Overpayment Amount	\$0.00
Total Paid (amount must equal sum of all checks)	\$204.18

Council District:
 Plan Area:
 Processed by JASON CHAN on 10/5/2023

Signature: _____

ADAMS BROADWELL JOSEPH & CARDOZO

A PROFESSIONAL CORPORATION

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October 5, 2023

VIA ONLINE SUBMISSION

City of Los Angeles Central Area Planning Commission

Online Portal: <https://plncts.lacity.org/oas>

VIA EMAIL

Central Area Planning Commission
C/O Etta Armstrong, Commission Executive Assistant
200 North Spring Street, Room 272,
Los Angeles, 90012

Email: apccentral@lacity.org

Oliver Netburn, City Planner

E-mail: oliver.netburn@lacity.org

**Re: Appeal of Director's Determination Regarding 1050 La Cienega
Boulevard Project (SCH No. 2022090143; Case Nos. ENV-2022-2280-
SCEA; DIR-2022-2279-TOC-SPR-VHCA).**

Dear Commission Members, Ms. Armstrong, and Mr. Netburn:

On behalf of Coalition for Responsible Equitable Economic Development Los Angeles ("CREED LA"), we submit this appeal of the City of Los Angeles ("City") Director's September 21, 2023, approval of the 1050 La Cienega Boulevard Project (SCH No. 2022090143; Case Nos. ENV-2022-2280-SCEA; DIR-2022-2279-TOC-SPR-VHCA) ("Project"), proposed by 1050 La Cienega, LLC ("Applicant"). The scope of the Director's determination included the following:

1. Based on the whole of the administrative record, that the project was assessed in Case No. ENV-2022-2280-SCEA, adopted on November 22, 2022; and pursuant to CEQA Guidelines, Sections 15162 and 15164, no subsequent EIR, negative declaration, or addendum is required for approval of the project,

L6300-006j

2. Approve with Conditions a 45 percent increase in density, consistent with the provisions of the Transit Oriented Communities (“TOC”) Affordable Housing Incentive Program along with the following one (1) incentive for a qualifying Tier 3 project totaling 290 dwelling units, reserving a minimum of 29 units for Extremely Low Income (ELI) Household occupancy for a period of 55 years: Utilization of any/all of the yard/setback requirements of the RAS3 Zone for a project in a commercial zone;
3. Pursuant to LAMC Section 16.05, Site Plan Review for a development project creating 50 or more residential dwelling units.
4. Adopt findings

The Director’s determination was issued in a Letter of Determination (“LOD”) on September 21, 2023, after a public hearing held by the Hearing Officer on behalf of the Director on July 18, 2023. Prior to the Hearing Officer’s hearing, the Project was first considered by the Planning and Land Use Management (“PLUM”) Committee on November 1, 2022. The PLUM Committee issued a recommendation that the City Council approve the SCEA. On November 22, 2022, the City Council certified the SCEA on its consent calendar, without taking public comment.

The Project’s approval process violates CEQA and the City’s municipal code in several ways. First, the City improperly segmented approval of the Project’s CEQA document from its underlying entitlements, which were considered and approved at separate times by separate decisionmakers. Second, as a consequence of the City Council’s improper and premature certification of the SCEA, the Hearing Officer applied CEQA’s subsequent review standards when considering the SCEA. Third, the City Council certified the SCEA without a public hearing before the legislative body – the full City Council – in violation of CEQA. In addition to violating CEQA, these legal defects invalidate the Director’s approval of the Project’s entitlements, as the Los Angeles Municipal Code (“LAMC”) prohibits the Director from approving the Project’s entitlements unless “an appropriate environmental review clearance has been prepared in accordance with the requirements of CEQA.”¹

¹ LAMC Section 16.05(E)(4).
L6300-006j

October 5, 2023

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Further, the LAMC prohibits the Director from approving the Project's underlying entitlements if the Project has significant environmental and public health impacts, as here.² CREED LA submitted extensive written and expert comments on October 21, 2022 and January 24, 2023 which demonstrate that the Project would have potentially significant impacts in several key areas, including health risk, noise, energy, and hazards, and that Project lacked required measures to avoid or mitigate those impacts to a level of insignificance.³ The Director therefore lacked substantial evidence to make the findings necessary under the LAMC to approve the Project's entitlements.

CREED LA hereby appeals all actions taken by the Director with regard to the Project as described in the September 21, 2023 LOD. CREED LA respectfully requests that the Planning Commission vacate the Director's determination, which was not supported by substantial evidence and relied on an SCEA that does not comply with CEQA.

This appeal is timely filed in compliance with the LAMC. The reasons for this appeal are set forth herein and in the attachments, which include CREED LA's comments on the SCEA and subsequent comments.⁴ We incorporate by reference the attached comments and exhibits, which are in the City's record of proceedings for the Project.⁵

I. STANDING TO APPEAL

The Los Angeles Municipal Code provides that the Director's decision becomes final if no appeal is filed within 15 days from the date of mailing of the determination.⁶ Appeals can be made by any interested party.⁷ Appeals of the Director's decision are made to the Area Planning Commission of the area in which

² LAMC Section 16.05(E), (F).

³ Pub. Res. Code § 21155.2(b)(1).

⁴ **Attachment A:** Letter from Adams Broadwell Joseph & Cardozo ("ABJC") to City re: Comments on the Sustainable Communities Environmental Assessment for the 1050 La Cienega Boulevard Project (SCH No. 2022090143; Case Nos. ENV-2022-2280-SCEA; DIR-2022-2279-TOC-SPR-VHCA). (Oct. 21, 2022); **Attachment B:** Letter from ABJC to City re: Comments on Agenda Item # 4 – 1050 La Cienega Boulevard Project (Case Nos. ENV-2022-2280-SCEA; DIR-2022-2279-TOC-SPR-VHCA; SCH No. 2022090143) (Jan. 24, 2023).

⁵ We reserve the right to supplement these comments at later hearings and proceedings on the Project. Gov. Code § 65009(b); PRC § 21177(a); *Bakersfield Citizens for Local Control v. Bakersfield* (2004) 124 Cal. App. 4th 1184, 1199-1203; see *Galante Vineyards v. Monterey Water Dist.* (1997) 60 Cal. App. 4th 1109, 1121,

⁶ LAMC Section 16.05(G)(4).

⁷ LAMC Section 16.05(H)(2).

the property is located.⁸ The appeal will be set for a public hearing to be held within 75 days of the filing of the appeal.⁹ The decision shall be in writing and based upon evidence in the record, including testimony and documents produced at the hearing before the Area Planning Commission, and supported by additional findings as may be required by Section 16.05(F).¹⁰

CREED LA and its members are interested persons who would be adversely affected by the Director's determination. CREED LA is an unincorporated association of individuals and labor organizations that may be adversely affected by the potential public and worker health and safety hazards, and the environmental impacts of the Project. The coalition includes the Sheet Metal Workers Local 105, International Brotherhood of Electrical Workers Local 11, Southern California Pipe Trades District Council 16, and District Council of Iron Workers of the State of California, along with their members, their families, and other individuals who live and work in the City of Los Angeles.

Individual members of CREED LA and its member organizations live, work, recreate, and raise their families in the City of Los Angeles and surrounding communities. Accordingly, they would be directly affected by the Project's environmental and health and safety impacts. Individual members may also work on the Project itself. They will be first in line to be exposed to any health and safety hazards that exist onsite.

CREED LA seeks to ensure a sustainable construction industry over the long-term by supporting projects that have positive impacts for the community, and which minimize adverse environmental and public health impacts. CREED LA has an interest in enforcing environmental laws that encourage sustainable development and ensure a safe working environment for its members. Environmentally detrimental projects can jeopardize future jobs by making it more difficult and more expensive for business and industry to expand in the region, and by making the area less desirable for new businesses and new residents. Indeed, continued environmental degradation can, and has, caused construction moratoriums and other restrictions on growth that, in turn, reduce future employment opportunities.

⁸ LAMC Section 16.05(H).

⁹ LAMC Section 16.05(H)(3).

¹⁰ LAMC Section 16.05(H)(4).

CREED LA's appeal is timely filed within 15 days from the date of mailing of the determination.¹¹ Therefore, CREED LA has standing to appeal the Director's decision.

II. REASONS FOR APPEAL

A. The Director's Reliance on CEQA's Subsequent Review Standards Violates CEQA

CREED LA appeals the Director's findings which incorrectly found that, based on the administrative record, the Project was assessed and adopted by the City Council on November 22, 2022, and is not subject to further CEQA review under CEQA's subsequent review standards. As explained in detail in CREED LA's January 24, 2023, comments on the Project,¹² this finding violates CEQA's procedural mandates and is invalid as a matter of law.

First, under CEQA, the Director could not find that the Project's SCEA was properly assessed and adopted by the City Council because the SCEA was not approved by the same body approving the project entitlements. Courts have explained that "[a] decision on both matters must be made by the same decision-making body because '... CEQA is violated when the authority to approve or disapprove the project is separated from the responsibility to complete the environmental review.'"¹³ In *POET, LLC v. State Air Resources Bd.* (2013) 218 Cal.App.4th 681, 731, the court explained:

For an environmental review document to serve CEQA's basic purpose of informing governmental decision makers about environmental issues, that document must be reviewed and considered by the same person or group of persons who make the decision to approve or disapprove the project at issue.

¹¹ The LOD was mailed on September 21, 2023; see LAMC Section 16.05(G)(4).

¹² Attachment B, pg. 5-8.

¹³ *Citizens for the Restoration of L Street v. City of Fresno* (2014) 229 Cal.App.4th 340, 360, citing *POET, LLC v. State Air Resources Bd.* (2013) 218 Cal.App.4th 681, 731; see *Clews Land & Livestock, LLC v. City of San Diego* (2017) 19 Cal.App.5th 161, 188 ("for an environmental review document to serve CEQA's basic purpose of informing governmental decision makers about environmental issues, that document must be reviewed and considered by the same person or group of persons who make the decision to approve or disapprove the project at issue"); *California Clean Energy Committee v. City of San Jose* (2013) 220 Cal.App.4th 1325, 1341 (project approval "skirt[red] the purpose of CEQA by segregating environmental review of the EIR from the project approval").

In other words, the separation of the approval function from the review and consideration of the environmental assessment is inconsistent with the purpose served by an environmental assessment as it insulates the person or group approving the project 'from public awareness and the possible reaction to the individual members' environmental and economic values.

Here, the Project's SCEA was approved by the City Council on November 22, 2022, whereas the project entitlements (a Site Plan Review and TOC Approval) were considered separately at a subsequent Hearing Officer hearing. This process violated the principles articulated in the above-referenced cases.

A related defect in the Director's decision is that the Director relied on CEQA's subsequent review standards. Rather than certifying the SCEA, the Director merely found that the Project was analyzed in the SCEA already approved by the City Council. CEQA's subsequent review standards do not apply to initial approval of a Project. CEQA's subsequent review standards apply to subsequent modifications to projects which were previously approved and for which an EIR was previously certified or an MND/Negative Declaration previously adopted.¹⁴ These legal standards do not apply to projects which have not yet received their initial entitlement approvals.

Here, the Project's SCEA was approved by the City Council on November 22, 2022, whereas the project entitlements (a Site Plan Review and TOC Approval) were considered separately at a subsequent Hearing Officer hearing. The Director's determination issued on September 21, 2023, was thus the Project's initial approval of its land use entitlements. As a result, the Director's finding that the Project is not subject to further CEQA review under CEQA's subsequent review standards was invalid as a matter of law.

The Director failed to proceed in the manner required by law by purporting to rely on a CEQA document which had been prematurely adopted to support approval of the Project's underlying entitlements. The Director's decision also violated the Municipal Code's mandate not to approve the Project's entitlements unless "an appropriate environmental review clearance has been prepared in accordance with the requirements of CEQA."¹⁵ CREED LA respectfully requests that the Commission vacate the Director determination approving the Project on this basis.

¹⁴ Pub. Res. Code, § 21166; CEQA Guidelines Sections 15162-15164.

¹⁵ LAMC Section 16.05(E)(4).

B. The Director’s Approval of Site Plan Review Was Contrary to Law and Unsupported by the Record

The LAMC provides that, in granting site plan approval, the Director may condition and/or modify the project as necessary to implement the general or specific plan and to mitigate significant adverse effects of the development project on the environment and surrounding areas.¹⁶ The Director shall not approve or conditionally approve a site plan review for a development project unless an appropriate environmental review clearance has been prepared in accordance with the requirements of CEQA.¹⁷ Findings that the Director must make include:

1. that the project is in substantial conformance with the purposes, intent and provisions of the General Plan, applicable community plan, and any applicable specific plan;
2. that the project consists of an arrangement of buildings and structures (including height, bulk and setbacks), off-street parking facilities, loading areas, lighting, landscaping, trash collection, and other such pertinent improvements, that is or will be compatible with existing and future development on adjacent properties and neighboring properties; and
3. that any residential project provides recreational and service amenities to improve habitability for its residents and minimize impacts on neighboring properties.¹⁸

The stated purposes of Site Plan Review are:

To promote orderly development, evaluate and mitigate significant environmental impacts, and promote public safety and the general welfare by ensuring that development projects are properly related to their sites, surrounding properties, traffic circulation, sewers, other infrastructure and environmental setting; and to control or mitigate the development of projects which are likely to have a significant adverse effect on the environment as identified in the City’s environmental review process, or on surrounding properties by reason of inadequate site planning or improvements.¹⁹

¹⁶ LAMC Section 16.05(E)(2)

¹⁷ LAMC Section 16.05(E)(4).

¹⁸ LAMC Section 16.05(F).

¹⁹ LAMC Section 16.05(A)

But as is shown herein and in our prior comments, the Project would have significant environmental and public health impacts, and is inconsistent with General Plan policies. Thus, the Director lacked substantial evidence to make the findings necessary to approve the Project's entitlements.

CREED LA's prior comments included substantial evidence demonstrating that the Project will cause significant health risk impacts due to exposure from diesel particulate matter ("DPM") during construction. Air quality and health risk expert Dr. James Clark corrected flaws in the City's health risk analysis, and found that the Project's construction impacts exceed the applicable 10 in 1 million significance threshold.²⁰ Specifically, the City's health risk analysis failed to account for Age Sensitivity Factors ("ASFs") when analyzing the risk to sensitive receptors. ASFs are meant to address the early-in-life susceptibility to carcinogens. The Applicant's responses to comments argued against use of ASFs, but CREED LA's responsive comments provided further evidence supporting the use of ASFs.²¹ Despite this evidence, the Director approved the Project without updating the Project's analysis and mitigation to reflect a conservative analysis of the Project's health risk impact.

The Project's failure to mitigate its emissions of DPM is inconsistent with Policy 1.3.1 of the City of Los Angeles' General Plan Air Quality Element, which provides: "[m]inimize particulate emissions from construction sites."²² Policy 5.3.1 of the Air Quality Element provides: "Support the development and use of equipment powered by electric or low-emitting fuels."²³ Here, the Project does not only fail to minimize particulate emissions, it fails to reduce a significant impact to a less-than-significant level. The Project is thus inconsistent with these Policies.

The Project also would generate potentially significant health risks from disturbance and transport of toxic materials. The SCEA acknowledges that the Project has a risk of disturbing soil contaminants, including lead, chromium, and TPH.²⁴ Our comments explained that the City failed to disclose the health risk impacts of exposure to these contaminants, as required by CEQA.²⁵ The City has still failed to provide this information. The City cannot approve the Project until the Project's health impacts are fully disclosed.

²⁰ Clark SCEA Comments, pg. 7-8.

²¹ Attachment B, Clark Comments, pg. 2-3.

²² SCEA, pg. 5-20.

²³ SCEA, pg. 5-21.

²⁴ SCEA, pg. 5-114.

²⁵ *Bakersfield Citizens for Local Control v. City of Bakersfield* ("Bakersfield") (2004) 124 Cal.App.4th 1184.

CREED LA's prior comments identified potentially significant noise impacts on neighboring residences. To begin with, the City failed to properly establish the baseline noise level by only measuring noise at two locations. Accurate characterization of baseline noise levels is essential for evaluating the Project's noise impacts. CREED LA's noise expert explained that in contrast to the contentions in the Applicant's responses to comments, the baseline noise levels are still not properly established.²⁶

The City also failed to analyze potentially significant construction noise impacts on the upper floors of neighboring residences. The Project site is surrounded by sensitive receptors in multi-story residences. But the SCEA failed to consider noise levels during the erecting of upper stories of the Project and does not provide evidence that the mitigation measures provided for the at grade construction phases would be effective for this work.²⁷ CREED LA's noise expert provided analysis showing there would be a potentially significant impact exceeding the 75 dBA significance threshold in the LAMC. This impact requires mitigation.

The City's analysis of the Project's operational noise impacts does not fully account for all sources of noise. CREED LA's comments explain that the potential noise impact of mechanical equipment and noise from the pool deck/terrace may be significant.

In sum, the Project would have significant environmental and public health impacts, and is inconsistent with General Plan policies. These impacts are not adequately addressed in the SCEA or in conditions of approval in the LOD. The Director thus lacked substantial evidence to make the findings necessary to approve the Project's Site Plan Review.

²⁶ Toncheva Comments, pg. 1-2.

²⁷ Toncheva Comments, pg. 2.

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III. CONCLUSION

CREED LA respectfully requests that the City set a hearing on this appeal, and that the Commission uphold this appeal and vacate the Director's approval of the Project.

Sincerely,



Aidan P. Marshall

APM:ljl

ATTACHMENT A

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October 21, 2022

Via Email and Overnight Mail

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Re: Comments on the Sustainable Communities Environmental Assessment for the 1050 La Cienega Boulevard Project (SCH No. 2022090143; Case Nos. ENV-2022-2280-SCEA; DIR-2022-2279-TOC-SPR-VHCA).

Dear Mr. Netburn:

We are writing on behalf of Coalition for Responsible Equitable Economic Development Los Angeles (“CREED LA”) to provide comments on the Sustainable Communities Environmental Assessment (“SCEA”) prepared by the City of Los Angeles (“City”) for the 1050 La Cienega Boulevard Project (SCH No. 2022090143; Case Nos. ENV-2022-2280-SCEA; DIR-2022-2279-TOC-SPR-VHCA) (“Project”), proposed by 1050 La Cienega, LLC (“Applicant”).

The Project entails the removal of a vacant lot and the construction of a new 332-foot in height, 28-story, 297,690-square-foot, mixed-use building with 290 dwelling units, including 29 Extremely Low Income affordable housing units, and approximately 7,500 square feet of new commercial restaurant use.¹ The Project includes 426 vehicle parking spaces, 184 bicycle parking spaces, and 54,540 square feet of open space.² The Project is located at 1022, 1024, 1028, 1034, 1036, 1038, 1044, 1048, 1054, 1056, 1060, 1066 S. La Cienega Boulevard, Los Angeles, CA 90035.

¹ SCEA, pg. 2-1.

² *Id.*

The Project seeks discretionary approvals, including approval of Base and Additional Incentives pursuant to Los Angeles Municipal Code (“LAMC”) Section 12.22 A.31 and the Transit Oriented Communities Affordable Housing Incentive Program Guidelines (“TOC Guidelines”). These Incentives include (1) up to 70 percent increase in density, (2) 0.5 minimum required parking spaces for residential units, (3) 30 percent parking reduction for nonresidential (TOC Guidelines, (4) Floor Area Ratio (“FAR”) of a 3.75:1 in a commercial zone, and (5) utilize any or all of the yard requirements for the RAS3 zone.³ The Project also seeks, pursuant to LAMC Sections 16.05.C and 16.05.D, site plan review for a project for which by-right units minus existing units is greater than 50 units.

We reviewed the SCEA and its technical appendices with the assistance of air quality and health risk expert James Clark, Ph.D.⁴ We also received technical assistance from noise expert Jen Levins.⁵ The City must separately respond to these technical comments.

Based upon our review of the SCEA and supporting documentation, we conclude that the SCEA fails to comply with the requirements of CEQA. As explained more fully below, the SCEA does not accurately disclose potentially significant air quality, energy, and noise impacts. The SCEA also fails to disclose significant health risk impacts due to exposure from diesel particulate matter (“DPM”), and fails to fully disclose and mitigate health risks from disturbance and transport of toxic materials. The SCEA also includes errors in its project description and description of the environmental setting. As a result of its shortcomings, the SCEA lacks substantial evidence to support its conclusions and fails to properly mitigate the Project’s significant environmental impacts. The City cannot approve the Project until the errors and omissions in the SCEA are remedied in a Sustainable Communities Environmental Impact Report (“SCEIR”)⁶ that is recirculated for public review and comment.

I. STATEMENT OF INTEREST

CREED LA is an unincorporated association of individuals and labor organizations that may be adversely affected by the potential public and worker health and safety hazards, and the environmental impacts of the Project. The

³ SCEA, pg. 2-18, 19.

⁴ Dr. Clark’s technical comments and curricula vitae are attached hereto as **Exhibit A** (“Clark Comments”)

⁵ Ms. Levins’ technical comments and curricula vitae are attached hereto as **Exhibit B**.

⁶ Pub. Res. Code § 21155.2(c)(2).

coalition includes the Sheet Metal Workers Local 105, International Brotherhood of Electrical Workers Local 11, Southern California Pipe Trades District Council 16, and District Council of Iron Workers of the State of California, along with their members, their families, and other individuals who live and work in the City of Los Angeles.

Individual members of CREED LA and its member organizations live, work, recreate, and raise their families in the City of Los Angeles and surrounding communities. Accordingly, they would be directly affected by the Project's environmental and health and safety impacts. Individual members may also work on the Project itself. They will be first in line to be exposed to any health and safety hazards that exist onsite.

CREED LA seeks to ensure a sustainable construction industry over the long-term by supporting projects that have positive impacts for the community, and which minimize adverse environmental and public health impacts. CREED LA has an interest in enforcing environmental laws that encourage sustainable development and ensure a safe working environment for its members. Environmentally detrimental projects can jeopardize future jobs by making it more difficult and more expensive for business and industry to expand in the region, and by making the area less desirable for new businesses and new residents. Indeed, continued environmental degradation can, and has, caused construction moratoriums and other restrictions on growth that, in turn, reduce future employment opportunities.

II. LEGAL BACKGROUND

CEQA requires that an agency analyze the potential environmental impacts of its proposed actions in an environmental impact report ("EIR") (except in certain limited circumstances).⁷ The EIR is the very heart of CEQA.⁸ "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."⁹

CEQA has two primary purposes. First, CEQA is designed to inform decision makers and the public about the potential, significant environmental effects of a

⁷ See, e.g., PRC § 21100.

⁸ *Dunn-Edwards v. BAAQMD* (1992) 9 Cal.App.4th 644, 652.

⁹ *Comtys. for a Better Env' v. Cal. Res. Agency* (2002) 103 Cal. App.4th 98, 109 ("*CBE v. CRA*").

project.¹⁰ “Its purpose is to inform the public and its responsible officials of the environmental consequences of their decisions before they are made. Thus, the EIR “protects not only the environment but also informed self-government.”¹¹ The EIR has been described as “an environmental ‘alarm bell’ whose purpose it is to alert the public and its responsible officials to environmental changes before they have reached ecological points of no return.”¹²

Second, CEQA requires public agencies to avoid or reduce environmental damage when “feasible” by requiring “environmentally superior” alternatives and all feasible mitigation measures.¹³ The EIR serves to provide agencies and the public with information about the environmental impacts of a proposed project and to “identify ways that environmental damage can be avoided or significantly reduced.”¹⁴ If the project will have a significant effect on the environment, the agency may approve the project only if it finds that it has “eliminated or substantially lessened all significant effects on the environment where feasible” and that any unavoidable significant effects on the environment are “acceptable due to overriding concerns.”¹⁵

A. Streamlined Environmental Review for Transit Priority Projects

CEQA allows for the streamlining of environmental review for “transit priority projects” meeting certain criteria.¹⁶ To qualify as a transit priority project, a project must

- 1) contain at least 50 percent residential use, based on total building square footage and, if the project contains between 26 percent and 50 percent nonresidential uses, a floor area ratio of not less than 0.75;
- 2) provide a minimum net density of at least 20 dwelling units per acre; and
- 3) be within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan.¹⁷

¹⁰ 14 CCR § 15002(a)(1).

¹¹ *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal. 3d 553, 564.

¹² *Berkeley Keep Jets Over the Bay v. Bd. of Port Comm’rs.* (2001) 91 Cal. App. 4th 1344, 1354 (“*Berkeley Jets*”); *County of Inyo v. Yorty* (1973) 32 Cal.App.3d 795, 810.

¹³ 14 CCR§ 15002(a)(2) and (3); *see also Berkeley Jets*, 91 Cal.App.4th at 1354; *Citizens of Goleta Valley*, 52 Cal.3d at 564.

¹⁴ 14 CCR §15002(a)(2).

¹⁵ PRC § 21081; 14 CCR § 15092(b)(2)(A) & (B).

¹⁶ Pub. Res. Code §§ 21155, 21155.1, 21155.2.

¹⁷ Pub. Res. Code § 21155(b).

A transit priority project is eligible for CEQA's streamlining provisions where it is:

consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in either a sustainable communities strategy or an alternative planning strategy, for which the State Air Resources Board ... has accepted a metropolitan planning organization's determination that the sustainable communities strategy or the alternative planning strategy would, if implemented, achieve the greenhouse gas emission reduction targets.¹⁸

On September 3, 2020, the Regional Council of the Southern California Association of Governments ("SCAG") adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy ("2020-2045 RTP/SCS"), which was accepted by the California Air Resources Board ("CARB"). The final program EIR for the 2020-2045 RTP/SCS was certified on May 7, 2020.

If "all feasible mitigation measures, performance standards, or criteria set forth in the prior applicable environmental impact reports and adopted in findings made pursuant to Section 21081" are applied to a transit priority project, the project is eligible to conduct environmental review using a SCEA or an SCEIR.¹⁹ A SCEA must contain an initial study which "identif[ies] all significant or potentially significant impacts of the transit priority project ... based on substantial evidence in light of the whole record."²⁰ The initial study must also "identify any cumulative effects that have been adequately addressed and mitigated pursuant to the requirements of this division in prior applicable certified environmental impact reports."²¹ The SCEA must then "contain measures that either avoid or mitigate to a level of insignificance all potentially significant or significant effects of the project required to be identified in the initial study."²² The SCEA is not required to discuss growth inducing impacts or any project specific or cumulative impacts from cars and light-duty truck trips generated by the project on global warming or the regional transportation network.²³

After circulating the SCEA for public review and considering all comments, a lead agency may only approve the SCEA with findings that all potentially

¹⁸ Pub. Res. Code § 21155(a).

¹⁹ Pub. Res. Code § 21155.2.

²⁰ Pub. Res. Code § 21155.2(b)(1).

²¹ *Id.*

²² Pub. Res. Code § 21155.2(b)(2).

²³ Pub. Res. Code § 21159.28(a).

significant impacts have been identified and mitigated to a less-than-significant level.²⁴ A lead agency's approval of a SCEA must be supported by substantial evidence.²⁵

In this case, the City failed to conduct a proper analysis of the Project's noise, air quality, energy, hazards, and public health impacts. Furthermore, the SCEA fails to mitigate the significant effects of the Project, rendering the SCEA incomplete. The City must prepare a SCEIR in order to fully analyze and mitigate the Project's impacts.

III. THE PROJECT DESCRIPTION IS INADEQUATE

The SCEA does not meet CEQA's requirements because it fails to include an accurate and complete Project description, rendering the entire analysis inadequate. California courts have repeatedly held that "an accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR."²⁶ CEQA requires that a project be described with enough particularity that its impacts can be assessed.²⁷ Without a complete project description, the environmental analysis under CEQA is impermissibly limited, thus minimizing the project's impacts and undermining meaningful public review.²⁸ Accordingly, a lead agency may not hide behind its failure to obtain a complete and accurate project description.²⁹

CEQA Guidelines section 15378 defines "project" to mean "the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment."³⁰ "The term "project" refers to the activity which is being approved and which may be subject to several discretionary approvals by governmental agencies. The term project does not mean each separate governmental approval."³¹ Courts have explained that a complete description of a project must "address not only the immediate environmental consequences of going forward with the project,

²⁴ Pub. Res. Code § 21155(b)(3), (b)(4), (b)(5)

²⁵ Pub. Res. Code §21155(b)(7).

²⁶ *Stoepthemillenniumhollywood.com v. City of Los Angeles* (2019) 39 Cal.App.5th 1, 17; *Communities for a Better Environment v. City of Richmond* ("CBE v. Richmond") (2010) 184 Cal.App.4th 70, 85–89; *County of Inyo v. City of Los Angeles* (3d Dist. 1977) 71 Cal.App.3d 185, 193.

²⁷ 14 CCR § 15124; see, *Laurel Heights I, supra*, 47 Cal.3d 376, 192-193.

²⁸ *Id.*

²⁹ *Sundstrom v. County of Mendocino* ("Sundstrom") (1988) 202 Cal.App.3d 296, 311.

³⁰ CEQA Guidelines § 15378.

³¹ *Id.*, § 15378(c).

but also all “*reasonably foreseeable* consequence[s] of the initial project.”³² “If a[n]...EIR...does not adequately apprise all interested parties of the true scope of the project for intelligent weighing of the environmental consequences of the project, informed decision-making cannot occur under CEQA and the final EIR is inadequate as a matter of law.”³³

A. The SCEA Fails to Disclose the Construction Traffic Route

Regarding the traffic routes during Project construction, the SCEA states that “[t]ruck routes are expected to utilize the most convenient access to freeway ramps... The truck routes would comply with the approved truck routes designated within the City and/or adjacent jurisdictions... Trucks traveling to and from the Project Site must travel along the designated routes.”³⁴ The Transportation Assessment similarly states: “Haul trucks would travel on approved truck routes designated within the City and take the most direct route to the appropriate freeway ramps... The haul route will be reviewed by the City.”³⁵ The SCEA lacks any further description of the haul route. As a result, the SCEA fails to disclose the extent of impacts related to the haul route that may ultimately be selected for the Project, and lacks effective mitigation measures to ensure that any significant impacts caused by the haul route would be mitigated to less than significant levels.

As a result of this ambiguous project description, the SCEA improperly defers analysis of the impacts from construction traffic. Construction traffic generates health risk, noise, and safety impacts. Here, excavation for the Project would require an estimated 48,913 cubic yards of cut soils to be removed and exported to a regional landfill.³⁶ This process will require truck trips. The Project will also generate numerous truck trips during the various phases of the Project’s construction: “250 daily truck trips (125 inbound, 125 outbound) are forecasted to occur during the shoring / excavation phase, with approximately 42 trips per hour (21 inbound, 21 outbound) uniformly over a typical six-hour off-peak hauling period.”³⁷ The SCEA acknowledges that these trips would generate health risk and noise impacts, yet fails to disclose the severity of those impacts on sensitive receptors located along the haul route, because the haul route remains uncertain.³⁸

³² *Laurel Heights I*, 47 Cal. 3d 376, 398 (emphasis added); see also *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal. 4th 412, 449-50.

³³ *Riverwatch v. Olivenhain Municipal Water Dist.* (2009) 170 Cal. App. 4th 1186, 1201.

³⁴ SCEA, pg. 2-18.

³⁵ SCEA, Appendix J-1, pg. 80.

³⁶ SCEA, pg. 5-162.

³⁷ SCEA, Appendix J-1, pg. 80.

³⁸ SCEA, pg. 5-25.

Regarding noise, the SCEA states “[a]ccording to FHWA TNM 2.5 modeling, 42 haul trips per hour (21 empty inbound trips and 21 loaded outbound trips) would generate roadside noise levels of 62.6 dBA Leq.”³⁹ The SCEA compares this impact to existing noise levels on La Cienega Boulevard,⁴⁰ but nothing in the SCEA or other publicly available Project documents binds the Applicant to using La Cienega Boulevard as the exclusive haul route. As a result, the haul route could be shifted to another location. If a different route is used, impacts could be more severe than analyzed along La Cienega Boulevard. The SCEA fails to disclose impacts on the receptors along any other potential haul route. If an alternate route has lower existing ambient noise levels than La Cienega Boulevard, impacts on those receptors will be more severe than disclosed in the SCEA.

As a result of its failure to clearly describe the construction haul route, the SCEA lacks substantial evidence to support its conclusion that construction impacts associated with the haul route would be less than significant. Depending on the final location selected for the haul route, the route could result in potentially significant health risk and noise impacts on receptors that have not been considered in the SCEA.

IV. THE SCEA FAILS TO ADEQUATELY ANALYZE, QUANTIFY, AND MITIGATE THE PROJECT’S POTENTIALLY SIGNIFICANT IMPACTS

An SCEA must fully disclose all potentially significant impacts of a project, and implement all feasible mitigation to reduce those impacts to less than significant levels. The lead agency’s significance determination with regard to each impact must be supported by accurate scientific and factual data.⁴¹ An agency cannot conclude that an impact is less than significant unless it produces rigorous analysis and concrete substantial evidence justifying the finding.⁴²

Moreover, the failure to provide information required by CEQA is a failure to proceed in the manner required by law.⁴³ Challenges to an agency’s failure to proceed in the manner required by CEQA, such as the failure to address a subject required to be covered in an EIR or to disclose information about a project’s

³⁹ SCEA, pg. 5-162.

⁴⁰ SCEA, pg. 5-162.

⁴¹ 14 CCR § 15064(b).

⁴² *Kings Cty. Farm Bur. v. Hanford* (1990) 221 Cal.App.3d 692, 732.

⁴³ *Sierra Club v. State Bd. Of Forestry* (1994) 7 Cal.4th 1215, 1236.

environmental effects or alternatives, are subject to a less deferential standard than challenges to an agency’s factual conclusions.⁴⁴

Even when the substantial evidence standard is applicable to agency decisions to certify an EIR and approve a project, reviewing courts will not ‘uncritically rely on every study or analysis presented by a project proponent in support of its position. A clearly inadequate or unsupported study is entitled to no judicial deference.’⁴⁵

A. The SCEA Fails to Disclose and Mitigate Significant Health Risks

a. The SCEA Fails to Disclose and Mitigate Significant Health Risks from Construction Emissions

The SCEA acknowledges that the Project’s construction activities would generate Toxic Air Contaminant (“TAC”) emissions.⁴⁶ Specifically, operation of heavy equipment would generate DPM, a type of TAC.⁴⁷ The SCEA further acknowledges that DPM is carcinogenic.⁴⁸ The City prepared a Health Risk Assessment (“HRA”) to analyze the Project’s construction health risk impacts on nearby sensitive receptors. The significance threshold for this Project provides that a significant health risk impact occurs if the Project would expose sensitive receptors to air contaminants that exceed the maximum incremental cancer risk of 10 in one million.⁴⁹ The results of the City’s HRA show that carcinogenic risk and noncarcinogenic hazard estimates for the maximum exposed sensitive receptors do not exceed identified significance thresholds.⁵⁰ But the City’s HRA fails to adequately analyze the health risk impacts on especially vulnerable receptors like young children and the elderly.

An agency must support its findings of a project’s potential environmental impacts with concrete evidence – with “sufficient information to foster informed public participation and to enable the decision makers to consider the

⁴⁴ *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 435.

⁴⁵ *Berkeley Jets*, 91 Cal.App.4th at 1355.

⁴⁶ SCEA, pg. 5-25.

⁴⁷ *Id.*

⁴⁸ *Id.*

⁴⁹ Appendix B2: 1050 La Cienega Boulevard Project - Construction Health Risk Assessment (August 8, 2022), Pg. 8.

⁵⁰ SCEA, pg. 5-26.

environmental factors necessary to make a reasoned decision.”⁵¹ A project’s health risks “must be ‘clearly identified’ and the discussion must include ‘relevant specifics’ about the environmental changes attributable to the Project and their associated health outcomes.”⁵² CEQA mandates discussion, supported by substantial evidence, of the nature and magnitude of impacts of air pollution on public health.⁵³

Here, the City failed to adequately analyze the health risk impacts on especially vulnerable receptors like young children and the elderly by not employing “early life exposure adjustment factors” or “age sensitivity factors” (collectively, “ASFs”). ASFs reflect that young children and the elderly are more vulnerable to the health effects of DPM and other TACs.⁵⁴ ASFs account for increased sensitivity of children by weighting the impacts of their exposure to a project’s estimated emissions of TACs. The City attempts to justify its refusal to apply ASFs to its health risk analysis by relying on an incorrect and unsupported interpretation of U.S. EPA guidance,⁵⁵ which provides that ASFs are only considered when TACs act “through the mutagenic mode of action.”⁵⁶ The City argues that DPM is not mutagenic because only a percent of its constituent particles is mutagenic – and as a result, use of ASFs is not required for measuring DPM health impacts. However, this assertion is unsupported. Many expert agencies, including U.S. EPA itself, clearly identify DPM as mutagenic. U.S. EPA’s Chemical Assessment Summary for Diesel Particulate Matter plainly states that DPM is mutagenic:

[D]iesel exhaust (DE) is likely to be carcinogenic to humans by inhalation from environmental exposures. The basis for this conclusion includes the following lines of evidence: [...] **extensive supporting data including the demonstrated mutagenic and/or chromosomal effects of DE** and its organic constituents, and knowledge of the known mutagenic and/or

⁵¹ *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 516.

⁵² *Id.* at 518.

⁵³ *Sierra Club*, 6 Cal.5th at 518–522.

⁵⁴ See also SCEA, pg. 5-16 (stating that “[t]hose most vulnerable to the non-cancer health effects of diesel PM are children whose lungs are still developing and the elderly who may have other chronic health problems.”).

⁵⁵ U.S. EPA. 2006. Memorandum – Implementation of the Cancer Guidelines and Accompanying Supplemental Guidance – Science Policy Council Cancer Guidelines Implementation Workgroup Communication II: Performing Risk Assessments That Include Carcinogens Described in the Supplemental Guidance as having a Mutagenic Mode of Action.

⁵⁶ Appendix B2, pg. 5-6.

carcinogenic activity of a number of individual organic compounds that adhere to the particles and are present in the DE gases.⁵⁷ [emphasis added]

Thus, the U.S. EPA clearly identifies DPM as a mutagenic carcinogen, contrary to the statement in the SCEA. Even by the City's preferred methodology, the effect of the Project's DPM emissions on children must be analyzed using ASFs. Further, Dr. Clark identifies additional guidance from the Scientific Review Panel identifying DPM as mutagenic.⁵⁸ He also explains that the City of Los Angeles's own Air Quality And Health Effects guidance⁵⁹ provides that exposure to DPM may be *particularly* harmful to children, whose lungs are still developing.⁶⁰ In sum, the leading scientific authorities identify DPM as mutagenic, requiring use of ASFs to analyze impacts. In contrast, the City's contention that a TAC is not mutagenic unless all of its constituent compounds are mutagenic is unsupported by scientific authority. As a result, the SCEA's HRA lacks an accurate assessment of the severity of health impacts on young children and the elderly. The SCEA also fails to provide the legally required discussion, supported by substantial evidence, of the nature and magnitude of impacts of air pollution on public health, as required by CEQA.⁶¹

Adequate disclosure and mitigation of the Project's health risk impacts is especially important for this Project due to its proximity to residential land uses occupied by children and the elderly, as demonstrated in the figure⁶² (provided in the SCEA's noise analysis) below.

⁵⁷ U.S. Environmental Protection Agency, Integrated Risk Information System (IRIS) Chemical Assessment Summary: Diesel engine exhaust; CASRN N.A., pg. 11, available at https://iris.epa.gov/static/pdfs/0642_summary.pdf.

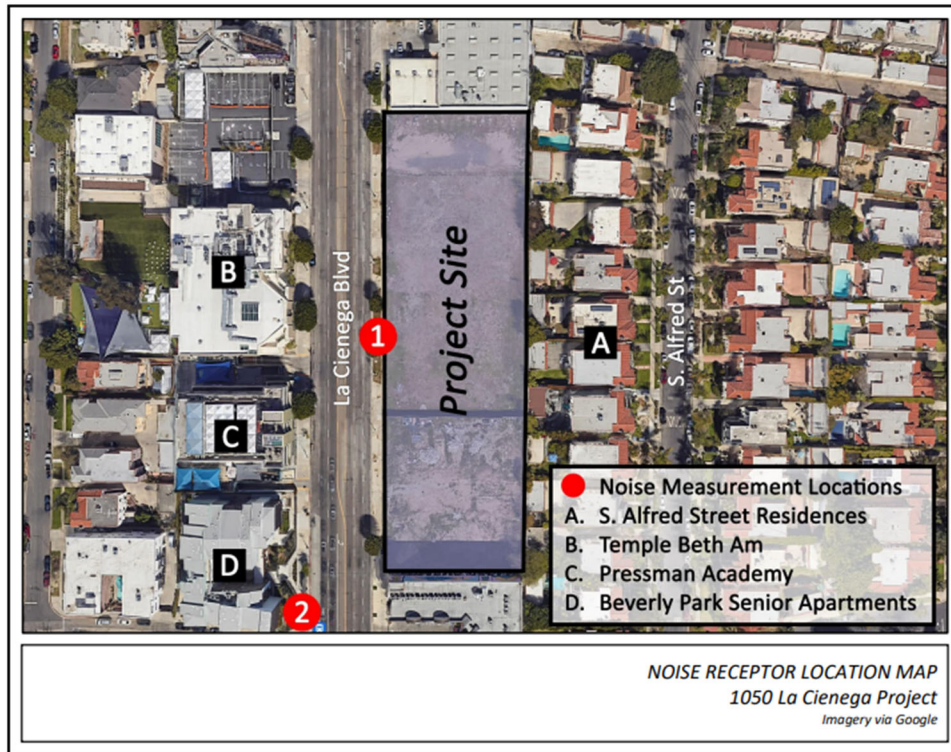
⁵⁸ Clark Comments, pg. 7.

⁵⁹ City of Los Angeles, Department of City Planning. 2019. Air Quality And Health Effects. Pg 10

⁶⁰ Clark Comments, pg. 5.

⁶¹ *Sierra Club*, 6 Cal.5th at 518–522.

⁶² Appendix H, Noise Receptor Location Map.



The figure above shows that a school is located 90 feet west of the Project site.⁶³ The figure shows that residences on South Alfred Street about the Project site. The figure also shows that senior citizen apartments are located across La Cienega Boulevard. As a result, the SCEA's inadequate disclosure and analysis of the Project's health risk impacts on especially sensitive receptors like children and the elderly requires the City to withdraw the SCEA and prepare an SCEIR.

Dr. Clark corrected the City's analysis to implement the appropriate ASFs, and found that the Project's construction impacts exceed the 10 in 1 million threshold.⁶⁴ Specifically, when analyzing the exposure for the receptor at the most sensitive age (children less than 2 years of age), the resulting risk to the receptor is 88 in 1,000,000 for the nearly three-year construction phase exposure.⁶⁵ This exceeds the 10 in 1 million significance threshold. Thus, the SCEA fails to disclose a potentially significant public health impact, in violation of CEQA. An SCEIR must be prepared to disclose and mitigate this impact.

⁶³ Pressman Education Center and Academy, affiliated with Temple Beth Am, located at 1055 La Cienega Boulevard.

⁶⁴ Clark Comments, pg. 7-8.

⁶⁵ Clark, pg. 8.

b. A Health Risk Analysis for Project Operation is Necessary Under CEQA to Adequately Analyze and Disclose the Project's Operational Health Risk Impacts

The City did not conduct a HRA for the Project's operations, and states that the construction HRA was merely provided for informational purposes.⁶⁶ This approach does not satisfy CEQA's requirements regarding disclosure and analysis of health risks.

Courts have held that an environmental review document must disclose a project's potential health risks to a degree of specificity that would allow the public to make the correlation between the project's impacts and adverse effects to human health.⁶⁷ In *Bakersfield Citizens for Local Control v. City of Bakersfield*, the court found that the EIRs' description of health risks were insufficient and that after reading them, "the public would have no idea of the health consequences that result when more pollutants are added to a nonattainment basin."⁶⁸ Likewise, in *Sierra Club*, the California Supreme Court held that the EIR's discussion of health impacts associated with exposure to the named pollutants was too general and the failure of the EIR to indicate the concentrations at which each pollutant would trigger the identified symptoms rendered the report inadequate.⁶⁹ Some connection between air quality impacts and their direct, adverse effects on human health must be made. As the Court explained, "a sufficient discussion of significant impacts requires not merely a determination of whether an impact is significant, but some effort to explain the nature and magnitude of the impact."⁷⁰ CEQA mandates discussion, supported by substantial evidence, of the nature and magnitude of impacts of air pollution on public health.⁷¹

Here, the Project's construction involves construction equipment and vehicles that emit DPM. Per the court decisions discussed above, it is insufficient merely to state that a Project will emit some amount of TACs, and that exposure to those TACs will or will not be significant. The City is required to explain the magnitude of the impact and resultant health impacts. Due to the proximity of the nearest sensitive receptors, the vulnerable age of those receptors, and the number of TAC-emitting sources involved in construction, the City's HRA cannot just be considered

⁶⁶ SCEA, pg. 5-26.

⁶⁷ *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184.

⁶⁸ *Id.* at 1220.

⁶⁹ *Sierra Club*, at 521.

⁷⁰ *Id.* at 519, citing *Cleveland National Forest Foundation v. San Diego Assn. of Governments* (2017) 3 Cal.5th 497, 514–515.

⁷¹ *Sierra Club*, 6 Cal.5th at 518–522.

a supplemental analysis, but a required portion of the disclosures required by CEQA.

The qualitative analysis relied on by the City for the operational phase of the Project is also inadequate disclosure. The Project's operations are reasonably expected to include sources that generate TACs. These include truck trips, and potentially an emergency generator.⁷² Backup generators commonly rely on fuels such as natural gas or diesel,⁷³ and thus can significantly impact public health through DPM emissions.⁷⁴ Due to the proximity of the nearest sensitive receptors to these sources of DPM, the Project's operations may result in potentially significant impacts. The City must prepare an HRA to evaluate the magnitude of the Project's health risk impacts in accordance with CEQA.

c. The SCEA Fails to Adopt Applicable and Feasible Mitigation

As demonstrated in Dr. Clark's comments, the Project would have a significant health risk impact during the construction phase. CEQA requires that the City implement all feasible mitigation to reduce impacts to less-than-significant levels. But the Project's significant health risk impacts are currently unmitigated.⁷⁵ Thus, an SCEIR must be prepared in which the City adopts applicable and feasible

⁷² Levins Comments, pg. 2.

⁷³ SCAQMD, Fact Sheet on Emergency Backup Generators, <http://www.aqmd.gov/home/permits/emergency-generators> ("Most of the existing emergency backup generators use diesel as fuel").

⁷⁴ California Air Resources Board, Emission Impact: Additional Generator Usage Associated with Power Outage (January 30, 2020), available at <https://ww2.arb.ca.gov/resources/documents/emissions-impact-generator-usage-during-psps> (showing that generators commonly rely on gasoline or diesel, and that use of generators during power outages results in excess emissions); California Air Resources Board, Use of Back-up Engines for Electricity Generation During Public Safety Power Shutoff Events (October 25, 2019), available at <https://ww2.arb.ca.gov/resources/documents/use-back-engines-electricity-generation-during-public-safety-power-shutoff> ("When electric utilities de-energize their electric lines, the demand for back-up power increases. This demand for reliable back-up power has health impacts of its own. Of particular concern are health effects related to emissions from diesel back-up engines. Diesel particulate matter (DPM) has been identified as a toxic air contaminant, composed of carbon particles and numerous organic compounds, including over forty known cancer-causing organic substances. The majority of DPM is small enough to be inhaled deep into the lungs and make them more susceptible to injury. Much of the back-up power produced during PSPS events is expected to come from engines regulated by CARB and California's 35 air pollution control and air quality management districts (air districts)").

⁷⁵ SCEA, pg. 4-8 (arguing that none of the construction emission measures in PMM AQ-1 are applicable to the Project).

mitigation measures from PMM AQ-1, such as requiring the Project to use Tier 4 Final equipment or better.⁷⁶

d. The Project Conflicts With Policies Regarding Air Quality and Health Risk

The CEQA Guidelines provide that a significant air quality impact would occur when a project “[c]onflict[s] with or obstruct implementation of the applicable air quality plan.”⁷⁷ Further, the Guidelines provide that a significant impact would occur if a project conflicts with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect.⁷⁸

Policy 1.3.1 of the City of Los Angeles’ General Plan Air Quality Element provides: “[m]inimize particulate emissions from construction sites.”⁷⁹ But here, the Project does not attempt to minimize DPM emissions from the Project’s construction, or even set minimum emissions standards for construction equipment. Nor does the SCEA adopt any of the mitigation measures recommended in PMM AQ-1. And the Project does not provide evidence that the particulate emissions measures in PMM AQ-1 or elsewhere are infeasible or ineffective. Thus, the Project fails to “minimize” PM emissions.

Policy 5.3.1 of the Air Quality Element provides: “Support the development and use of equipment powered by electric or low-emitting fuels.”⁸⁰ Here, the SCEA does not propose or evaluate the feasibility of electric or low-emission equipment during construction. Nor does the Project propose or evaluate the feasibility of utilizing existing power sources (e.g., power poles) or clean fuel generators rather than temporary power generators. During operations, the Project does not prohibit or consider the feasibility of prohibiting gas-powered landscape maintenance equipment. And the SCEA does not include other discussion of electric/low-emitting equipment. Due to the failure to analyze these options, the Project is inconsistent with Policy 5.3.1. The SCEA must be revised to include analysis evaluating these and other low-emitting fuel measures.

⁷⁶ SCEA, pg. 4-10.

⁷⁷ CEQA Guidelines, Appendix G, subd. III.

⁷⁸ CEQA Guidelines, Appendix G, subd. X.

⁷⁹ SCEA, pg. 5-20.

⁸⁰ SCEA, pg. 5-21.

B. The SCEA Fails to Adequately Analyze the Project's Potentially Significant Energy Impacts

The SCEA does not include sufficient investigation into energy conservation measures that might be available or appropriate for the Project. The Project is expected to consume 1,834,766 kilowatt-hour per year (kw-h/yr) of electricity, and 11,891 Thousand British Thermal Units per year (kBTU) of natural gas. But as will be discussed in more detail below, the SCEA does not sufficiently consider energy conservation measures like solar facilities, use of alternate fuel sources, and passive energy efficiency measures to ensure the Project's energy consumption would not be wasteful, inefficient, or unnecessary. This failure of analysis violates CEQA.

CEQA requires an environmental document to discuss mitigation measures for significant environmental impacts, including "measures to reduce the wasteful, inefficient, and unnecessary consumption of energy."⁸¹ The CEQA Guidelines require discussion of energy conservation measures when relevant, and provide examples in Appendix F:⁸²

- 1) Potential measures to reduce wasteful, inefficient and unnecessary consumption of energy during construction, operation, maintenance and/or removal. The discussion should explain why certain measures were incorporated in the project and why other measures were dismissed.
- 2) The potential of siting, orientation, and design to minimize energy consumption, including transportation energy, increase water conservation and reduce solid waste.
- 3) The potential for reducing peak energy demand.
- 4) Alternate fuels (particularly renewable ones) or energy systems.
- 5) Energy conservation which could result from recycling efforts.

Courts have rejected EIRs that fail to include adequate analysis investigation into energy conservation measures that might be available or appropriate for a project.⁸³ In *California Clean Energy Commission v. City of Woodland* ("CCEC"),⁸⁴ the Court of Appeal reviewed an EIR for a shopping center. The EIR concluded that, due to the proposed project's compliance with Title 24 guidelines and regulations,

⁸¹ Pub. Resources Code, § 21100(b)(3); *Tracy First v. City of Tracy* (2009) 177 Cal.App.4th 912, 930.

⁸² 14 Cal. Code Regs., § 15126.4(a)(1)(C) (stating "Energy conservation measures, as well as other appropriate mitigation measures, shall be discussed when relevant.").

⁸³ *Ukiah Citizens for Safety First v. City of Ukiah* (2016) 248 CA4th 256; *Spring Valley Lake Ass'n v. City of Victorville* (2016) 248 CA4th 91.

⁸⁴ (2014) 225 CA4th 173.

the project would be expected to have a less-than-significant impact regarding the wasteful, inefficient, or unnecessary consumption of energy. But the lead agency's EIR did not include discussion regarding the different renewable energy options that might be available or appropriate for the project. The Court held "the City's EIRs failed to comply with the requirements of Appendix F to the Guidelines by not discussing or analyzing renewable energy options."⁸⁵ The lead agency argued that compliance with the Building Code sufficed to address energy impact concerns for the project.⁸⁶ But the Court explained:

Although the Building Code addresses energy savings for components of a new commercial construction, it does not address many of the considerations required under Appendix F of the CEQA Guidelines... These considerations include whether a building should be constructed at all, how large it should be, where it should be located, whether it should incorporate renewable energy resources, or anything else external to the building's envelope. Here, a requirement that Gateway II comply with the Building Code does not, by itself, constitute an adequate assessment of mitigation measures that can be taken to address the energy impacts during construction and operation of the project.⁸⁷

Here, the SCEA fails to analyze whether onsite solar generation is feasible. The SCEA states that "the Project would include the provision of conduit that is appropriate for future photovoltaic and solar thermal collectors," and that CCR Title 24, Part 6, Section 110.10(b) through 110.10(d) requires a solar zone (which is a suitable place where solar panels can be installed at a future date).⁸⁸ But the SCEA does not disclose whether implementation of on-site solar facilities (i.e. solar panels) is presently technically or economically feasible. Nor does the SCEA disclose the extent to which implementation of solar facilities would reduce the Project's energy consumption. The SCEA also fails to disclose how much of the Project site could support onsite solar generation (i.e. the extent of the potential solar zone). This investigation is necessary to adequately evaluate the potential for increased energy efficiency and reduced waste, as required by CEQA Guidelines Appendix F.

The City may claim that the SCEA's statement that it would provide a solar zone in accordance with the City's Green Building Code constitutes an adequate analysis of onsite solar generation. The LA Green Building Code, in Section 4.211,

⁸⁵ *Id.* at 213.

⁸⁶ *Id.* at 210, 211.

⁸⁷ *CECC* (2014) 225 CA4th 173, 213.

⁸⁸ SCEA, pg. 5-61.

provides that buildings shall comply with Section 110.10(b-d) of the California Energy Code. Section 110.10(b) of the California Energy Code only requires the solar zone to be no less than 15 percent of the total roof area of the building excluding any skylight area. As in *CCEC*, these provisions of the Green Building Code “[do] not address many of the considerations required under Appendix F.”⁸⁹ These considerations include the technical and economic feasibility of installing solar facilities on the Project site, the potential size of the Project’s solar zone, and the potential magnitude of mitigation provided by installing solar facilities. To comply with CEQA Guidelines Appendix F, an SCEIR must be prepared to include this discussion.

In addition to failing to adequately discuss onsite energy generation, the SCEA does not analyze the feasibility of measures reducing operational natural gas use. These include building electrification measures, such as replacing gas stoves with electric stoves. The City might contend that compliance with the Green Building Code adequately addresses operational natural gas use, but the Green Building Code does not address operational natural gas use by mixed-use buildings like the Project.⁹⁰ Specifically, the Green Building Code’s “Residential Mandatory Measures” do not include a requirement to replace natural gas connections with electric ones.⁹¹ An SCEIR must be prepared to adequately analyze natural gas consumption and mitigation, as required by CEQA Guidelines Appendix F.

The SCEA’s discussion of energy conservation measures also violates CEQA Guidelines Appendix F in regards to offroad equipment used in the construction and operation of the Project. As discussed earlier, the SCEA does not propose or evaluate the feasibility of electric or low-emission equipment during construction. Nor does the Project propose or evaluate the feasibility of utilizing existing power sources (e.g., power poles) or clean fuel generators rather than temporary power generators. During operations, the Project does not prohibit or consider the feasibility of prohibiting gas-powered landscape maintenance equipment. And the SCEA does not include other discussion of electric/low-emitting equipment. Therefore, an SCEIR must be prepared.

The SCEA’s failure to adequately analyze onsite energy generation or measures to reduce natural gas use is inconsistent with local policy. The LA Green New Deal sets forth the goal: “All new buildings will be net zero carbon by 2030;

⁸⁹ *CECC* (2014) 225 CA4th 173, 213.

⁹⁰ Los Angeles Green Building Code, Chapter 4 (“Residential Mandatory Measures”).

⁹¹ *Id.*

and 100% of buildings will be net zero carbon by 2050.”⁹² The SCEA’s lack of analysis regarding strategies to reduce energy consumption conflicts with this goal.

The City of Los Angeles General Plan’s Air Quality Element sets forth, in Goal 5: “Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels, and the implementation of conservation measures including passive methods such as site orientation and tree planting.” The Project is inconsistent with this goal because it does not adequately analyze the use of renewable resources and less-polluting fuels. The SCEA lacks analysis of passive methods such as site orientation and tree planting, which are called for in Appendix F (which requires analysis of “[t]he potential of siting, orientation, and design to minimize energy consumption, including transportation energy, increase water conservation and reduce solid waste”).

Similarly, in PMM GHG-1, the 2020-2045 RTP/SCS provides: “Incorporate design measures to reduce energy consumption and increase use of renewable energy.”⁹³ As explained above, the SCEA lacks the analysis and mitigation promoted in this measure.

C. The SCEA Fails to Adequately Analyze and Mitigate Potentially Significant Noise Impacts

a. The SCEA Fails to Properly Establish Baseline Noise Levels

The SCEA fails to properly establish the baseline noise level by only measuring noise at two locations. “Noise measurements were obtained at two locations near the Project Site to aid in the characterization of daytime ambient noise conditions surrounding the Project Site and nearby sensitive receptors.”⁹⁴ The two locations are along La Cienega Boulevard.⁹⁵ Ms. Levins explains that no information is provided regarding the time of day the measurements were taken or the length of the measurements.

Additionally, Ms. Levins observes that no measurements were taken on S. Alfred Street, where there are numerous residential receptors abutting the Project site. Ms. Levins explains that noise levels on S. Alfred Street could be as much as 10 dB lower than on La Cienega Blvd. due distance from La Cienega, lower traffic

⁹² SCEA, pg. 5-105.

⁹³ SCEA, pg. 4-39.

⁹⁴ SCEA, pg. 5-152.

⁹⁵ SCEA, pg. 5-152; Appendix B-2.

volume on S. Alfred Street, and shielding from La Cienega provided by existing structure.⁹⁶ Instead, the City estimates the existing ambient noise level at the Alfred street residences.⁹⁷

CEQA requires that a lead agency include a description of the physical environmental conditions in the vicinity of the Project as they exist at the time environmental review commences.⁹⁸ The description of the environmental setting constitutes the baseline physical conditions by which a lead agency may assess the significance of a project's impacts.⁹⁹ Use of the proper baseline is critical to a meaningful assessment of a project's environmental impacts.¹⁰⁰ Baseline information on which a lead agency relies must be supported by substantial evidence.¹⁰¹ The CEQA Guidelines define "substantial evidence" as "enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion."¹⁰² "Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts ... [U]nsubstantiated opinion or narrative [and] evidence which is clearly inaccurate or erroneous ... is not substantial evidence."¹⁰³

Here, the SCEA fails to properly establish the baseline noise for two reasons. By failing to provide information regarding the time of day the measurements were taken or the length of the measurements, the accuracy of the City's noise baseline cannot be ascertained. As a result, the City relies on a baseline unsupported by substantial evidence, in violation of CEQA.

Second, the City's failure to measure existing noise levels at S. Alfred Street residences is also not supported by substantial evidence. No justification is provided why noise measurements were not taken at these residences, which are the nearest to the Project site. The SCEA's noise study also does not explain how it arrived at its estimated existing noise level for the S. Alfred Street residence. This approach

⁹⁶ Levins Comments, pg. 1.

⁹⁷ SCEA, pg. 5-158.

⁹⁸ CEQA Guidelines, § 15125, subd. (a).

⁹⁹ *Id.*

¹⁰⁰ *Communities for a Better Environment v. South Coast Air Quality Management District* (2010) 48 Ca.4th 310, 320.

¹⁰¹ *Id.* at 321 (stating "an agency enjoys the discretion to decide [...] exactly how the existing physical conditions without the project can most realistically be measured, subject to review, as with all CEQA factual determinations, for support by substantial evidence"); see *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 435.

¹⁰² CEQA Guidelines §15384.

¹⁰³ Pub. Resources Code § 21082.2(c).

does not constitute substantial evidence, as the City's estimate is not supported by facts. Further, facts suggest that the City's estimate may overestimate existing noise levels. As stated in Ms. Levins' comments, "[n]oise levels on S. Alfred Street could be as much as 10 dB lower than on La Cienega Blvd. due distance from La Cienega, lower traffic volume on S. Alfred Street, and shielding from La Cienega provided by existing structure."¹⁰⁴ An SCEIR must be prepared to provide accurate ambient noise levels for the S. Alfred Street residences.

b. The SCEA Fails to Analyze Potentially Significant Construction Noise Impacts on All Sensitive Receptors

The SCEA fails to analyze potentially significant construction noise impacts on the upper floors of neighboring residences. The Project site is surrounded by sensitive receptors in multi-story residences. East adjacent to the Site are several 2-story residential duplex buildings (1017-1077 Alfred Street).¹⁰⁵ West across La Cienega Boulevard is a 3-story religious building (1039 La Cienega Boulevard) that houses Temple Beth Am, a 4-story education center (1055 La Cienega Boulevard) that houses the Pressman Education Center and Academy, and a 4-story residential building (1071 La Cienega Boulevard) that houses the Beverly Park Senior Apartments.¹⁰⁶

The SCEA's construction noise analysis only considers the grading phase, with work occurring at or below grade level. Ms. Levins explains that during the grading phase, the Project's noise impacts are most attenuated by sound barriers.¹⁰⁷ The SCEA requires implementation of sound barriers during construction in mitigation measures NOI-1 and NOI-3.¹⁰⁸ But Ms. Levins states that in order for sound barriers to be effective, they must block the line of sight between the source and the receiver.¹⁰⁹ As the Project's 28-story tower is erected, construction work would occur above the height of the proposed barriers.¹¹⁰ There would be a direct line of sight to sensitive receptors. Ms. Levins observes that no calculations are presented for these phases of work and there is no evidence provided to show the sound level would be below the 75 dBA criteria.

¹⁰⁴ Levins Comments, pg. 1.

¹⁰⁵ SCEA, pg. 2-2.

¹⁰⁶ *Id.*

¹⁰⁷ Levins Comments, pg. 1-2.

¹⁰⁸ SCEA, pg. 4-61.

¹⁰⁹ Levins Comments, pg. 2.

¹¹⁰ *Id.*

In sum, the City’s approach violates CEQA for several reasons. The SCEA fails to analyze potentially significant impacts on upper story residences. The SCEA fails to disclose the impacts of all phases of construction, which have different impacts. The SCEA’s finding that construction noise impacts would be less than significant is not supported by substantial evidence. The mitigation (MM NOI-1 and NOI-3) the City concludes is sufficient to reduce construction to a less-than-significant level is ineffective. An SCEIR must be prepared containing analysis of the tower-construction phase’s noise impacts, and mitigation must be formulated to mitigate the potentially significant impacts that are detected.

c. The SCEA Does Not Identify All Mechanical Systems Reasonably Required for the Project.

The SCEA does not identify all mechanical systems reasonably required for the Project. The SCEA’s discussion of the Project’s operational noise from mechanical equipment states that noise may be generated by the Project’s HVAC system, and its filtering and pumping equipment for the proposed pools and other water features.¹¹¹ Ms. Levins explains that this type of project typically includes additional equipment: an emergency generator, garage exhaust fans, and air handling units.¹¹² She further states that an emergency generator could generate a sound level of 71 dBA at a distance of 50 ft. This impact would exceed the City’s significance threshold, requiring mitigation.¹¹³

Courts have explained that a complete description of a project must “address not only the immediate environmental consequences of going forward with the project, but also all “*reasonably foreseeable* consequence[s] of the initial project.”¹¹⁴ “If a[n]...EIR...does not adequately apprise all interested parties of the true scope of the project for intelligent weighing of the environmental consequences of the project, informed decision-making cannot occur under CEQA and the final EIR is inadequate as a matter of law.”¹¹⁵

Here, the SCEA may be omitting disclosure and analysis of equipment reasonably expected for the Project’s operations. As a result, the full extent of the Project’s operational noise impacts – which potentially exceed significance

¹¹¹ SCEA, pg. 5-162, 163.

¹¹² Levins Comments, pg. 2.

¹¹³ *Id.*

¹¹⁴ *Laurel Heights I*, 47 Cal. 3d 376, 398 (emphasis added); see also *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal. 4th 412, 449-50.

¹¹⁵ *Riverwatch v. Olivenhain Municipal Water Dist.* (2009) 170 Cal. App. 4th 1186, 1201.

thresholds – are not adequately evaluated and mitigated. An SCEIR must be prepared to resolve this issue with the SCEA’s project description, impacts analysis, and mitigation.

d. The SCEA Does Not Adequately Evaluate Operational Noise Impacts from Mechanical Systems

As previously stated, the SCEA’s discussion of the Project’s operational noise from mechanical equipment states that noise may be generated by the Project’s HVAC system, and its filtering and pumping equipment for the proposed pools and other water features.¹¹⁶ The SCEA concludes noise impacts from these sources would not increase ambient noise levels at nearby receptors. But this conclusion is not supported by quantitative analysis. The City’s approach is inconsistent with CEQA, as courts have held that the lead agency’s significance determination with regard to each impact must be supported by accurate scientific and factual data.¹¹⁷

e. The SCEA Fails to Adequately Evaluate Operational Noise Impacts from Recreation Areas.

The SCEA claims that noise impacts from the Project’s roof deck, balconies, and shared amenity areas would result in less-than-significant impacts.¹¹⁸ The SCEA reasons:

The primary source of noise associated with the Project’s balconies and shared amenity areas would be speech/conversation from Project users. Vocal noise from speech and conversation averages between 55 and 67 dBA at a reference distance of one meter, in proportion to background noise levels. Given the rapid attenuation of speech/conversation and the Project’s elevated surrounding ambient noise levels, it is unlikely that vocal noises from outdoor uses would be audible at nearby sensitive receptors, let alone capable of causing or contributing to significant noise increases.¹¹⁹

Ms. Levins explains that the City’s analysis is unrealistic because it only considers the noise generated by a single person talking.¹²⁰ It is more realistic to assume multiple occupants speaking at the same time. Further, it is reasonable to

¹¹⁶ SCEA, pg. 5-162, 163.

¹¹⁷ 14 CCR § 15064(b).

¹¹⁸ SCEA, pg. 5-163.

¹¹⁹ *Id.*

¹²⁰ Levins Comments, pg. 3.

assume the Project's open spaces could be used for parties and gatherings, with many people talking at once. It is also reasonable to assume that music may be played in these spaces. It is also reasonable to assume open spaces would be used in the evening and at night, when there are lower ambient sound levels.¹²¹ In sum, the actual noise impacts from the Project's open spaces are far greater than disclosed in the SCEA. An SCEIR must be prepared to analyze the reasonable use of these spaces.

Ms. Levins demonstrates that impacts from reasonable use of the Project's open spaces are potentially significant:

Excluding the effect of background music and shielding, 25 voices in "normal" conversation would generate 59 dBA at a distance of 30 ft. However, the existing ambient sound levels are elevated and may cause people to speak louder to be heard over traffic noise. With 25 "raised" voices, the resulting sound level would be approximately 65 dBA at a distance of 30 ft, and a sound level of 72 dBA would be generated by 5 people shouting.¹²²

The impacts in Ms. Levins' analysis would likely exceed the 3 dba threshold set out in the SCEA.¹²³ The increase in noise may be especially significant because ambient noise levels are typically reduced in the evening.¹²⁴

f. The City's Operational Noise Significance Thresholds Are Not Supported by Substantial Evidence

The Project's operational noise significance thresholds are not supported by substantial evidence because they do not reflect sleep disturbance impacts. The Project includes several sources of potential sleep-disturbing operational noise impacts: the balconies and rooftop area; mechanical equipment including an HVAC; and roadway traffic noise. Yet the Project is surrounded by residential uses. Compliance with the SCEA's significance thresholds for these noise impacts does not constitute substantial evidence that sleep disturbance impacts are less-than-significant.

¹²¹ *Id.*

¹²² *Id.*

¹²³ SCEA, pg. 5-162.

¹²⁴ Levins Comments, pg. 3.

Courts have held that compliance with noise regulations alone is not substantial evidence of a less-than-significant impact.¹²⁵ In *Oro Fino Gold Mining Corp. v. County of El Dorado* (“*Oro Fino*”),¹²⁶ a mining company applied for a special use permit for drilling holes to explore for minerals.¹²⁷ The mining company argued the proposed mitigated negative declaration prohibited noise levels above the applicable county general plan noise standard maximum of 50 dBA and, therefore, there could be no significant noise impact. The court rejected this argument: “we note that conformity with a general plan does not insulate a project from EIR review where it can be fairly argued that the project will generate significant environmental effects.”¹²⁸ Thus, the court concluded an EIR was required.

In *Citizens for Responsible & Open Government v. City of Grand Terrace* (“*Grand Terrace*”),¹²⁹ the city approved a 120-unit senior housing facility based on a mitigated negative declaration.¹³⁰ The noise element of the city’s general plan stated exterior noise levels in residential areas should be limited to 65 dB CNEL.¹³¹ The initial study concluded the facility’s air conditioner units would cause noise impacts, but with mitigating measures the project would operate within the general plan’s noise standard. But the court cited *Oro Fino* for the principle that “conformity with a general plan does not insulate a project from EIR review where it can be fairly argued that the project will generate significant environmental effects.”¹³² A citizen’s group provided substantial evidence supporting such a fair argument. This evidence included testimony from an individual in the HVAC industry that the type of air conditioning units proposed by the project “sound like airplanes.”¹³³ And at a city council public hearing, community and city council members expressed concern that the air conditioners would be noisy.¹³⁴ The court considered the testimony about the noise generated by the proposed air

¹²⁵ *King & Gardiner Farms, LLC v. Cnty. of Kern* (2020) 45 Cal.App.5th 814, 865.

¹²⁶ (1990) 225 Cal.App.3d 872.

¹²⁷ *Id.* at pg. 876; see also *Keep our Mountains Quiet v. County of Santa Clara* (2015) 236 Cal.App.4th 714; *Citizens for Responsible & Open Government v. City of Grand Terrace* (2008) 160 Cal.App.4th 1323, 1338; *Gentry v. City of Murrieta* (1995) 36 Cal.App.4th 1359, 1416 (project’s effects can be significant even if “they are not greater than those deemed acceptable in a general plan”); *Environmental Planning & Information Council v. County of El Dorado* (1982) 131 Cal.App.3d 350, 354, (“CEQA nowhere calls for evaluation of the impacts of a proposed project on an existing general plan”).

¹²⁸ *Id.* at pp. 881–882.

¹²⁹ (2008) 160 Cal.App.4th 1323.

¹³⁰ *Id.* at 1327.

¹³¹ *Grand Terrace*, 160 Cal.App.4th at 1338.

¹³² *Grand Terrace*, *supra*, at pg. 1338.

¹³³ *Id.* at 1338-1339.

¹³⁴ *Id.* at 1338.

conditioners, took into account the mitigation measures, and concluded “there is substantial evidence that it can be fairly argued that the Project may have a significant environmental noise impact.”¹³⁵

Here, the SCEA states that operational noise would be less-than-significant if it would be less than 3 dBA.¹³⁶ The SCEA also states that impacts would be less-than-significant because LAMC Section 112.02 prohibits noise from mechanical equipment, including HVACs, from exceeding 5 decibels at receptors.¹³⁷

These significance thresholds do not address the Project’s potential for sleep disturbance at nearby residential receptors. The World Health Organization (“WHO”) identifies a guidance of 45 dBA Leq (outdoors) to avoid sleep disturbance from a continuous source, and a limit of 60 dBA Lmax for intermittent sources.¹³⁸ The significance thresholds summarized above do not necessarily consider noise impacts at WHO levels significant, nor otherwise address potential sleep disturbance impacts. Further, the City’s significance thresholds do not identify the unique impacts of sound systems/speakers on sleep: low frequency bass notes can cause significant impacts even when the A-weighted level complies with applicable code. This occurs because low frequency bass notes pass through exterior walls and closed windows with little reduction.¹³⁹

The Project has potentially significant sleep disturbance impacts on nearby residential receptors. The Project includes 54,540 square feet of open space on several decks, the roof and in private balconies.¹⁴⁰ Noise would potentially be generated by people that are accommodated on the roof deck. Noise would also potentially be generated by speakers on the roof deck or other open spaces – there is no condition in the SCEA precluding use of speakers. Thus, there is the potential for low-frequency bass notes to disturb sleep. Ms. Levin presents calculations demonstrating that music played from the Project’s terraces could exceed the WHO guideline of 60 dBA to avoid sleep disturbance excessive noise. Thus, noise from the Project’s rooftop and open spaces occurring between 10 PM and 7 AM could cause sleep disturbance and would be potentially significant.

¹³⁵ *Id.* at p. 1341.

¹³⁶ SCEA, pg. 5-162.

¹³⁷ SCEA, pg. 5-162.

¹³⁸ Levins Comments, pg. 3.

¹³⁹ *Id.*

¹⁴⁰ SCEA, pg. 2-13.

In sum, the City's operational noise thresholds do not account for the Project's potential sleep disturbance impacts. Meanwhile, substantial evidence shows that noise impacts on sleep are potentially significant. An SCEIR must be prepared to analyze and mitigate this impact.

D. The SCEA Fails to Disclose and Mitigate the Project's Significant Hazards Impacts

a. The SCEA Fails to Identify Adequate Mitigation for the Project's Significant Hazards Impacts

EIRs and SCEAs must mitigate significant impacts through measures that are "fully enforceable through permit conditions, agreements, or other legally binding instruments."¹⁴¹ Here, the SCEA fails to adopt mitigation necessary to mitigate impacts from transport of hazardous materials. The SCEA claims that adoption of PMM HAZ-3 is inapplicable.¹⁴² PMM HAZ-3 provides: "[w]here the construction and operation of projects involves the transport of hazardous materials, avoid transport of such materials within one-quarter mile of schools, when school is in session, wherever feasible."¹⁴³ The City reasons, "[t]he Project does not include the shipment of flammable liquids and other hazardous materials and does not include any rail transportation... Thus, incorporation of this mitigation measure is not required."¹⁴⁴ But the City's conclusion is not supported by substantial evidence.

The Project's Phase II Environmental Site Assessment ("Phase II ESA") identified significant levels of soil contamination. Soil sampling conducted in undocumented fill materials throughout the Site detected lead, chromium, and concentrations of Total Petroleum Hydrocarbons ("TPH") exceeding residential screening levels.¹⁴⁵ The Phase II ESA also identified impacts to soil, soil vapor, and groundwater from the upgradient automotive service station in the northern margin and western margin of the site.¹⁴⁶ The SCEA states that with implementation of the MM HAZ-1, Project impacts related to risk of upset would be less than significant.¹⁴⁷ MM HAZ-1 provides, in part, that all contaminated soil would be

¹⁴¹ CEQA Guidelines, § 15126.4, subd. (a)(2).

¹⁴² SCEA, pg. 4-47.

¹⁴³ SCEA, pg. 4-48.

¹⁴⁴ *Id.*

¹⁴⁵ SCEA, pg. 5-113.

¹⁴⁶ SCEA, pg. 5-113.

¹⁴⁷ SCEA, pg. 5-114.

segregated and removed from the site to an approved treatment/disposal facility.¹⁴⁸ Since the Project acknowledges, in its adoption of PMM HAZ-1, that it would require transport of contaminated soil and toxics from the Project site, the Project creates potential impacts due to transport of hazardous materials.

The Project's transport of contaminants from the Project requires adoption of the 2020-2045 RTP/SCS's PMM HAZ-3, which provides: "[w]here the construction and operation of projects involves the transport of hazardous materials, avoid transport of such materials within one-quarter mile of schools, when school is in session, wherever feasible."¹⁴⁹ Here, the Project involves transport of hazardous materials. Exposure to TPH can cause health impacts such as fatigue, headache, nausea, and drowsiness, nerve disorders, peripheral neuropathy, and death.¹⁵⁰ Exposure to Chromium or Lead can cause various respiratory, cardiovascular, gastrointestinal, immunological, reproductive effects, etc.¹⁵¹ Transport of these contaminants, among others, would occur within one-quarter mile of schools. These schools include Pressman Education Center and Academy, located at 1055 La Cienega Boulevard, 90 feet west of the site, and St. Mary Magdalen Catholic School, located at 1223 Corning Street, 1,320 feet southwest of the site.¹⁵² Transport of contaminants removed from the Project site is thus a potentially-significant health risk that requires adoption of PMM HAZ-3. An SCEIR must be prepared to resolve this currently unmitigated impact.

b. The SCEA Fails to Disclose Health Effects Due to Soil Contamination

The City fails to correlate the impacts from the Project's potential soil contamination impacts with the adverse health effects on workers, future residents, and surrounding community.

The court in *Bakersfield Citizens for Local Control* held that to properly analyze an impact, it must be correlated with the adverse health effects it

¹⁴⁸ SCEA, pg. 5-116.

¹⁴⁹ SCEA, pg. 4-48.

¹⁵⁰ Agency for Toxic Substances and Disease Registry ("ATSDR"), Public Health Statement for TPH, (September 1999), <https://www.atsdr.cdc.gov/ToxProfiles/tp123-c1-b.pdf>; ATSDR, Toxicological Profile for Total Petroleum Hydrocarbons, <https://www.atsdr.cdc.gov/TSP/ToxProfiles/ToxProfiles.aspx?id=424&tid=75>.

¹⁵¹ ATSDR, Toxicological Profile for Chromium, (September 2012), <https://www.atsdr.cdc.gov/toxprofiles/tp7.pdf>; ATSDR, Toxicological Profile for Lead, (August 2020), <https://www.atsdr.cdc.gov/toxprofiles/tp13.pdf>.

¹⁵² SCEA, pg. 5-117.

creates.¹⁵³ The court in *Bakersfield* reviewed EIRs that showed that two projects would have significant and unavoidable adverse impacts on air quality. However, these projects failed to disclose the health consequences that necessarily result from the identified adverse air quality impacts:

Buried in the description of some of the various substances that make up the soup known as “air pollution” are brief references to respiratory illnesses. However, there is no acknowledgement or analysis of the well-known connection between reduction in air quality and increases in specific respiratory conditions and illnesses. After reading the EIR's, the public would have no idea of the health consequences that result when more pollutants are added to a nonattainment basin. On remand, the health impacts resulting from the adverse air quality impacts must be identified and analyzed in the new EIR's.¹⁵⁴

Here, the SCEA acknowledges that the Project has a risk of disturbing soil contaminants, including lead, chromium, and TPH. But the SCEA does not correlate these risks to the health consequences of exposure to these contaminants. As in *Bakersfield*, there may be brief references to health risks associated with exposure to contaminants on the Project site in the SCEA's Appendix F, which contains 6,430 pages relating to the Environmental Site Assessments prepared for the Project. But as in *Bakersfield*, any information that may be in this Appendix is scattered and inaccessible.¹⁵⁵ Further, these brief, general references to health effects of certain contaminants do not educate the public regarding the particular impacts of this Project on this particular community. An SCEIR must be prepared the specific health consequences of this Project's activities.

VII. CONCLUSION

The Project would result in potentially significant impacts to public health from TACs and hazards, which were not adequately analyzed and mitigated to less than significant levels. The Project also failed to adequately analyze and mitigate impacts to energy and noise. Moreover, the SCEA violates CEQA by failing to adequately explain the significance of impacts on people and the environment.

¹⁵³ *Bakersfield Citizens for Local Control v. City of Bakersfield* (“*Bakersfield*”) (2004) 124 Cal.App.4th 1184.

¹⁵⁴ *Bakersfield Citizens for Local Control* 124 Cal.App.4th 1184.

¹⁵⁵ See SCEA, Appendix F, pg. 2342 (a non-project-specific document discussing lead hazards).

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For the foregoing reasons, we respectfully request that the City of Los Angeles reject the SCEA and deny the Project Approvals, until the City prepares and circulates the public a Draft SCEIR, as required by CEQA, and modifies the Project to be consistent with all laws, regulations and policies.

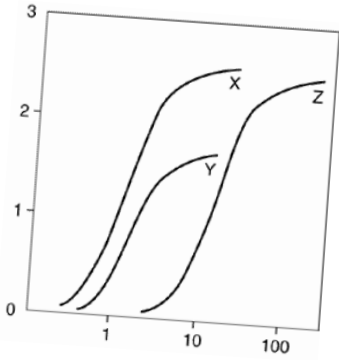
Sincerely,



Aidan P. Marshall

Attachments
APM:acp

EXHIBIT A



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October 20, 2022

Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080

Attn: Mr. Aidan Marshall

Subject: Comments On Sustainable Communities Environmental Assessment (SCEA) For The 1050 La Cienega Boulevard Project, Los Angeles, CA 90035 Case Number: ENV-2022-2280-SCEA

Dear Mr. Marshall:

At the request of Adams Broadwell Joseph & Cardozo (ABJC), Clark and Associates (Clark) has reviewed materials related to the 2022 City of Los Angeles' (the City's) Sustainable Communities Environmental Assessment (SCEA) of the above referenced project.

Clark's review of the materials in no way constitutes a validation of the conclusions or materials contained within the plan. If we do not comment on a specific item this does not constitute acceptance of the item.

Project Description:

According to the City, The Project would construct a mixed-use development with 290 residential units (36 studio units, 158 1-bedroom units, and 96 2-bedroom units) and 7,500 square feet of restaurant commercial use in a 28-story, 297,690-square-foot building. The Project would include a total of 426 vehicle parking spaces, 184 bicycle parking spaces (164 long term and 20 short term), and 54,540 square feet of open space, as well as an approximately 4,500 square-foot publicly accessible pocket park located at the northern portion of the Project Site.

The Project Site is located on the east side of La Cienega Boulevard, between Olympic Boulevard and Whitworth Drive. The Site consists of 10 parcels zoned C2-1-O, located in the Wilshire Community Plan area of the City of Los Angeles (City). The City of Beverly Hills is located north of Olympic Boulevard, 300 feet north of the Site.



Figure 1: Proposed Project Site Plan

The Project Site contains a two- to three-story, 33,057 square-foot commercial building (Roseberry Building) and approximately 15,119 square foot surface parking lot with 64 automobile parking spaces. The building would be retained and the parking lot would be redeveloped.

The Project Site is located in the Wilshire Community Plan area of the City of Los Angeles.

The area surrounding the project site includes:

- A 1-story commercial building (1016-1018 La Cienega Boulevard) to the north of the Site, that houses an auto repair facility (Matrix Collision Repair Facility). This area is zoned C2-1-O.
- To the south there is an adjacent to the Site is a 3-story commercial building (1080 La Cienega Boulevard) that houses a variety of retail, restaurant, and acupuncture clinics. This area is zoned C2-1-O.
- To the west of the Site, across La Cienega Boulevard, are a variety of uses listed below (from north to south). This area is zoned C2-1-O.
 - Surface parking lot (1019-1029 La Cienega Boulevard)
 - 3-story religious building (1039 La Cienega Boulevard) that houses Temple Beth Am
 - 4-story education center (1055 La Cienega Boulevard) that houses the Pressman Education Center and Academy
 - 4-story residential building (1071 La Cienega Boulevard) that houses the Beverly Park Senior Apartments.
- To the east of the Site, there are several 2-story residential duplex buildings (1017-1077 Alfred Street). This area is zoned R2-1-O-HPOZ.
- The school closest to the Site is Pressman Education Center and Academy, affiliated with Temple Beth Am, located at 1055 La Cienega Boulevard, 90 feet west of the Site.

There are potentially significant air quality and public health impacts that are not addressed in the City's analysis that must be addressed in an environmental impact report ("EIR")

Specific Comments:

- 1. The Health Risk Analysis (HRA) Presented In The SCEA Inaccurately Assumes That An Age Sensitivity Factor (ASF), Accounting For The Mutagenicity of Diesel Particulate, Is Not Included In The HRA Resulting In An Underestimation of The Risks From Diesel Particulate Matter (DPM)**

In Construction Health Risk Assessment to the SCEA,¹ Air Quality Dynamics, a consultant for the Proponent, states that based on their review of “available guidance” on the use of early life exposure adjustments (age sensitivity factors or ASFs) to identified carcinogens, the use of ASFs was not applicable since neither the Lead Agency nor SCAQMD have developed recommendations on whether ASFs should be used for CEQA analyses of potential DPM construction impacts. The text of the HRA also states that it relied on U.S. EPA guidance² related to early life exposure adjust factors whereby the adjustment factors are only considered when carcinogens act “through the mutagenic mode of action”.³ The HRA goes to state that “As presented in the technical memorandum, numerous compounds were identified as having a mutagenic mode of action. For diesel particulates, polycyclic aromatic hydrocarbons (PAHs) and their derivatives, which are known to exhibit a mutagenic mode of action, comprise < 1% of the exhaust particulate mass. To date, the U.S. Environmental Protection Agency reports that whole diesel engine exhaust has not been shown to elicit a mutagenic mode of action (USEPA, 2018).”

The analysis that the use of the ASFs is not inconsistent with the guidance from the City and the record from the State of California regarding the health effects of exposure to diesel exhaust. According to the City of Los Angeles’s Air Quality And Health Effects guidance,⁴ exposure to DPM may be a health hazard, particularly to *children* (emphasis added) whose lungs are still developing and the elderly who may have other serious health problems. This statement from the City’s guidance

¹ Air Quality Dynamics. 2022. 1050 La Cienega Boulevard Project – Construction Health Risk Assessment. Dated August 8, 2022. Page 182-183 of 639 of Appendices A-E.

² U.S. EPA. 2006. Memorandum – Implementation of the Cancer Guidelines and Accompanying Supplemental Guidance – Science Policy Council Cancer Guidelines Implementation Workgroup Communication II: Performing Risk Assessments That Include Carcinogens Described in the Supplemental Guidance as having a Mutagenic Mode of Action.

³ Air Quality Dynamics. 2022. 1050 La Cienega Boulevard Project – Construction Health Risk Assessment. Dated August 8, 2022. Page 182-183 of 639 of Appendices A-E.

⁴ City of Los Angeles, Department of City Planning. 2019. Air Quality And Health Effects. Pg 10

clearly indicates that the City is aware that age of exposure to DPM has a significant impact on the potential health outcomes.

The guidance goes on to state that “potential TAC (toxic air contaminant) impacts are evaluated by conducting a qualitative analysis consistent with CARB and SCAQMD guidance, and may be followed by a *more detailed analysis* utilizing CARB’s Hotspots Analysis and Reporting Program (HARP) model where the project results in a substantial source of TACs or if a project would site sensitive land uses in proximity to TAC sources.”⁵ According to CARB, “HARP can be used by the air pollution control and air quality management districts (districts), facility operators and other organizations or individuals to promote statewide consistency, efficiency and cost-effective development of facility emission inventories and conducting health risk assessments. HARP can also be used for conducting health risk assessments used in other programs (e.g., facility permitting, *CEQA reviews*).”^{6,7}

The City’s statement in the guidance clearly indicates that the use of the HARP model (without restrictions) and its algorithms which incorporate the use of ASFs for carcinogens, to derive project specific health risks is appropriate. The guidance goes on to states that the HARP model has become an accepted industry standard in evaluating health impacts from TACs and providing reliable and meaningful analysis.⁸

⁵ City of Los Angeles, Department of City Planning. 2019. Air Quality And Health Effects. Pg 10

⁶ CARB. 2022. Hot Spots Analysis & Reporting Program: About. <https://ww2.arb.ca.gov/our-work/programs/hot-spots-analysis-reporting-program/about>

⁷ CARB and CAPCOA. 2015. Risk Management Guidance For Stationary Sources of Air Toxics. Pg 40. https://ww2.arb.ca.gov/sites/default/files/classic/toxics/rma/rmgssat.pdf?_ga=2.71249616.1384737318.1660245722-1818700787.1659738080

⁸ City of Los Angeles, Department of City Planning. 2019. Air Quality And Health Effects. Pg 36

Furthermore, the HRA misstates the State of California’s guidance on the health impacts of diesel exhaust. In its 1998 Report On Diesel Exhaust,⁹ the Scientific Review Panel (SRP) staffed by members of the California Air Resources Board (CARB) and the Office of Environmental Health Hazard Assessment (OEHHA) explicitly states that “Diesel exhaust contains genotoxic compounds in both the vapor phase and the particle phase. Diesel exhaust particles or extracts of diesel exhaust particles are *mutagenic* (emphasis added) in bacteria and in *mammalian cell systems*, and *can induce chromosomal aberrations, aneuploidy, and sister chromatid exchange in rodents and in human cells in vitro*. Diesel exhaust particles induced unscheduled DNA synthesis in vitro in mammalian cells”

It is clear from the line of evidence above that the use of ASFs in the health analysis of risks from TACs associated with the Project is appropriate and necessary. The City must re-evaluate the risk using the ASFs in the calculation of the risks to the residents nearby.

2. Using the ASFs It Is Clear That The Risks From Exposure To DPM From Construction And Operation of the Project Exceed The 10 In 1,000,000 Threshold.

As note above in Comment 2 the City of Los Angeles’s Air Quality And Health Effects guidance,¹⁰ states that exposure to DPM may be a health hazard, particularly to *children* (emphasis added) whose lungs are still developing and the elderly who may have other serious health problems. The City’s guidance clearly indicates that the exposure of sensitive populations, e.g., young children, should be evaluated in the HRA for the Project emissions.

⁹ CARB. 2022. Findings of the Scientific Review Panel on The Report On Diesel Exhaust as adopted at the Panel’s April 22, 1998, Meeting. Site reviewed August 11, 2022. <https://ww2.arb.ca.gov/sites/default/files/classic/toxics/dieseltac/de-fnds.pdf>

¹⁰ City of Los Angeles, Department of City Planning. 2019. Air Quality And Health Effects. Pg 10

Using the results of the City’s dispersion model of DPM on a residential receptor it is clear that the cumulative risks will exceed the 10 in 1,000,000 threshold for the construction phase of the Project. Taking the DPM concentrations (0.38922 micrograms per cubic meter (ug/m³)) from Tables A1 of the HRA, I have recalculated the risks to be consistent with the guidance.

Table A1
Quantification of Carcinogenic Risks and Noncarcinogenic Hazard
South Alfred Street / Maximum Exposed Residential Receptor (Thrid Trimester)

Source (a)	Mass GLC		Weight Fraction (d)	Contaminant (e)	Carcinogenic Risk				Noncarcinogenic Hazard		
	(ug/m ³) (b)	(mg/m ³) (c)			URF (ug/m ³) ⁻¹ (f)	CPF (mg/kg/day) ⁻¹ (g)	DOSE (mg/kg-day) (h)	RISK (i)	REL (ug/m ³) (j)	RID (mg/kg/day) (k)	RESP (l)
On-Site Exhaust	0.38922	3.89E-04	1.00E+00	Diesel Particulate	3.0E-04	1.1E+00	1.0E-04	3.2E-07	5.0E+00	1.4E-03	7.8E-02
TOTAL								3.2E-07	7.8E-02		

Note:

Exposure factors used to calculate contaminant intake

exposure frequency (days/year)	261
exposure duration (years)	0.25
inhalation rate (L/kg-day)	361
inhalation absorption factor	1
averaging time (years)	70
fraction of time at home	0.85

Using the modeled concentration of 0.38922 ug/m³ and an exposure duration of 2.61-years, starting the exposure for the receptor at the most sensitive age (children less than 2 years of age), the resulting risk to the receptor is 88 in 1,000,000 for the nearly three-year construction phase exposure.

The results of the analysis are presented as an exhibit to this letter.

Age Group	Risk	Age Sensitivity	FAH	ED	CPF	Dose Air	Cair	BR/BW	A	EF
3rd Trimester	3.36E-06	10	0.85	0.25	1.1	0.000100473	0.38922	361	1	0.715068
0<2	8.10E-05	10	0.85	2	1.1	0.000303368	0.38922	1090	1	0.715068
2<9	3.33E-06	3	0.72	0.41	1.1	0.000239633	0.38922	861	1	0.715068

In order for the construction scenario to reach a *de minimis* level of less than 10 in 1,000,000, the exposure concentration of DPM must not exceed 0.0442 ug/m³. The City must look at additional mitigation measures to reduce the concentration of DPM released during the construction phase.

The City's HRA of the impacts, as presented in the SCEA, do not accurately assessment the probable impacts over time. The City must revise its HRA, require additional mitigation measures during the construction operational phase, and present the results in an environmental impact report (EIR).

Conclusion

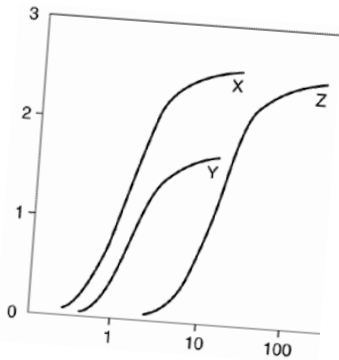
The facts identified and referenced in this comment letter lead me to reasonably conclude that the Project could result in significant unmitigated impacts if the SCE is approved. The City must re-evaluate the significant impacts identified in this letter by requiring the preparation of an EIR.

Sincerely,

A handwritten signature in black ink, appearing to read "F. J. Coe". The signature is written in a cursive style with a horizontal line extending to the left from the first letter.

EXHIBIT A

CV



Clark & Associates
Environmental Consulting, Inc

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James J. J. Clark, Ph.D.

Principal Toxicologist

Toxicology/Exposure Assessment Modeling

Risk Assessment/Analysis/Dispersion Modeling

Education:

Ph.D., Environmental Health Science, University of California, 1995

M.S., Environmental Health Science, University of California, 1993

B.S., Biophysical and Biochemical Sciences, University of Houston, 1987

Professional Experience:

Dr. Clark is a well-recognized toxicologist, air modeler, and health scientist. He has 30 years of experience in researching the effects of environmental contaminants on human health including environmental fate and transport modeling (SCREEN3, AEROMOD, ISCST3, Johnson-Ettinger Vapor Intrusion Modeling, RESRAD, GENII); exposure assessment modeling (partitioning of contaminants in the environment as well as PBPK modeling); conducting and managing human health risk assessments for regulatory compliance and risk-based clean-up levels; and toxicological and medical literature research.

SELECTED AIR MODELING RESEARCH/PROJECTS

Client(s) - Confidential

Dr. Clark performed a historical dose reconstruction for community members from an active 700 acre petroleum refinery in Los Angeles. The analysis included a multi-year dispersion model was performed in general accordance with the methods outlined by the U.S. EPA and the SCAQMD for assessing the health impacts in Torrance, California. The results of the analysis are being used as the basis for injunctive relief for the communities surrounding the refinery.

Client(s) – Multiple

Indoor Air Evaluations, California: Performed multiple indoor air screening evaluations and risk characterizations consistent with California Environmental Protection Agency's (Cal/EPA) Department of Toxic Substances Control (DTSC) and Regional Water Quality Control Board (RWQCB) methodologies. Characterizations included the use of DTSC's

modified Johnson & Ettinger Model and USEPA models, as well as the attenuation factor model currently advocated by Cal/EPA's Office of Environmental Health and Hazard Assessment (OEHHA).

Client – Adams, Broadwell, Joseph Cardozo, P.C.

Dr. Clark has performed numerous air quality analyses and risk assessments of criteria pollutants, air toxins, and particulate matter emissions for sites undergoing evaluation via the California Environmental Quality Act (CEQA) process. The analyses include the evaluation of Initial Study (IS) and Environmental Impacts Reports (EIR) for each project to determine the significance of air quality, green house gas (GHG), and hazardous waste components of the projects. The analyses were compiled as comment letters for submittal to oversight agencies.

Client – Confidential

Dr. Clark performed a comprehensive evaluation of criteria pollutants, air toxins, and particulate matter emissions from a carbon black production facility to determine the impacts on the surrounding communities. The results of the dispersion model were used to estimate acute and chronic exposure concentrations to multiple contaminants and were be incorporated into a comprehensive risk evaluation.

Client – Confidential

Dr. Clark performed a comprehensive evaluation of air toxins and particulate matter emissions from a railroad tie manufacturing facility to determine the impacts on the surrounding communities. The results of the dispersion model have been used to estimate acute and chronic exposure concentrations to multiple contaminants and have been incorporated into a comprehensive risk evaluation.

PUBLIC HEALTH/TOXICOLOGY

Client: Confidential

Dr. Clark performed a historical dose reconstruction for community members from radiologically impacted material (RIM) releases from an adjacent landfill. The analysis was performed in general accordance with the methods outlined by the Agency for Toxic Substances Control (ATSDR) for assessing radiation doses from historical source areas in North St. Louis County, Missouri.

Client: City of Santa Clarita, Santa Clarita, California

Dr. Clark managed the oversight of the characterization, remediation and development activities of a former 1,000 acre munitions manufacturing facility for the City of Santa

Clarita. The site is impacted with a number of contaminants including perchlorate, unexploded ordinance, and volatile organic compounds (VOCs). The site is currently under a number of regulatory consent orders, including an Imminent and Substantial Endangerment Order. Dr. Clark assisted the impacted municipality with the development of remediation strategies, interaction with the responsible parties and stakeholders, as well as interfacing with the regulatory agency responsible for oversight of the site cleanup.

Client: Confidential

Dr. Clark performed a historical dose reconstruction for community members exposed to radioactive waste released into the environment from legacy storage facilities. The releases resulted in impacts to soils, sediments, surface waters, and groundwater in the vicinity of the sites. The analysis was performed in general accordance with the methods outlined by the Agency for Toxic Substances Control (ATSDR) for assessing radiation doses from historical source areas in the community.

Client: Confidential

Dr. Clark performed a dose assessment of an individual occupationally exposed to metals and silica from fly ash who later developed cancer. A review of the individual's medical and occupational history was performed to prepare opinions regarding his exposure and later development of cancer.

Client: Brayton Purcell, Novato, California

Dr. Clark performed a toxicological assessment of residents exposed to methyl-tertiary butyl ether (MTBE) from leaking underground storage tanks (LUSTs) adjacent to the subject property. The symptomology of residents and guests of the subject property were evaluated against the known outcomes in published literature to exposure to MTBE. The study found that residents had been exposed to MTBE in their drinking water; that concentrations of MTBE detected at the site were above regulatory guidelines; and, that the symptoms and outcomes expressed by residents and guests were consistent with symptoms and outcomes documented in published literature.

Client: Confidential

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to hexavalent chromium who later developed cancer. A review of the individual's medical and occupational history was performed to prepare opinions regarding her exposure and later development of cancer.

Client: Covanta Energy, Westwood, California

Evaluated health risk from metals in biosolids applied as soil amendment on agricultural lands. The biosolids were created at a forest waste cogeneration facility using 96% whole tree wood chips and 4 percent green waste. Mass loading calculations were used to estimate Cr(VI) concentrations in agricultural soils based on a maximum loading rate of 40 tons of biomass per acre of agricultural soil. The results of the study were used by the Regulatory agency to determine that the application of biosolids did not constitute a health risk to workers applying the biosolids or to residences near the agricultural lands.

Client: Kaiser Venture Incorporated, Fontana, California

Prepared PBPK assessment of lead risk of receptors at a 1,100-acre former steel mill. This evaluation was used as the basis for granting closure of the site by lead regulatory agency.

RISK ASSESSMENTS/REMEDIAL INVESTIGATIONS

Kaiser Ventures Incorporated, Fontana, California

Prepared health risk assessment of semi-volatile organic chemicals and metals for a fifty-year old wastewater treatment facility used at a 1,100-acre former steel mill. This evaluation was used as the basis for granting closure of the site by lead regulatory agency.

ANR Freight - Los Angeles, California

Prepared a comprehensive Preliminary Endangerment Assessment (PEA) of petroleum hydrocarbon and metal contamination of a former freight depot. This evaluation was as the basis for reaching closure of the site with lead regulatory agency.

Kaiser Ventures Incorporated, Fontana, California

Prepared comprehensive health risk assessment of semi-volatile organic chemicals and metals for 23-acre parcel of a 1,100-acre former steel mill. The health risk assessment was used to determine clean up goals and as the basis for granting closure of the site by lead regulatory agency. Air dispersion modeling using ISCST3 was performed to determine downwind exposure point concentrations at sensitive receptors within a 1 kilometer radius of the site. The results of the health risk assessment were presented at a public meeting sponsored by the Department of Toxic Substances Control (DTSC) in the community potentially affected by the site.

Unocal Corporation - Los Angeles, California

Prepared comprehensive assessment of petroleum hydrocarbons and metals for a former petroleum service station located next to sensitive population center (elementary school). The assessment used a probabilistic approach to estimate risks to the community and was used as the basis for granting closure of the site by lead regulatory agency.

Client: Confidential, Los Angeles, California

Managed oversight of remedial investigation most contaminated heavy metal site in California. Lead concentrations in soil excess of 68,000,000 parts per billion (ppb) have been measured at the site. This State Superfund Site was a former hard chrome plating operation that operated for approximately 40-years.

Client: Confidential, San Francisco, California

Coordinator of regional monitoring program to determine background concentrations of metals in air. Acted as liaison with SCAQMD and CARB to perform co-location sampling and comparison of accepted regulatory method with ASTM methodology.

Client: Confidential, San Francisco, California

Analyzed historical air monitoring data for South Coast Air Basin in Southern California and potential health risks related to ambient concentrations of carcinogenic metals and volatile organic compounds. Identified and reviewed the available literature and calculated risks from toxins in South Coast Air Basin.

IT Corporation, North Carolina

Prepared comprehensive evaluation of potential exposure of workers to air-borne VOCs at hazardous waste storage facility under SUPERFUND cleanup decree. Assessment used in developing health based clean-up levels.

Professional Associations

American Public Health Association (APHA)

Association for Environmental Health and Sciences (AEHS)

American Chemical Society (ACS)

International Society of Environmental Forensics (ISEF)

Society of Environmental Toxicology and Chemistry (SETAC)

Publications and Presentations:

Books and Book Chapters

- Sullivan, P., **J.J. J. Clark**, F.J. Agardy, and P.E. Rosenfeld. (2007). *Synthetic Toxins In The Food, Water and Air of American Cities*. Elsevier, Inc. Burlington, MA.
- Sullivan, P. and **J.J. J. Clark**. 2006. *Choosing Safer Foods, A Guide To Minimizing Synthetic Chemicals In Your Diet*. Elsevier, Inc. Burlington, MA.
- Sullivan, P., Agardy, F.J., and **J.J.J. Clark**. 2005. *The Environmental Science of Drinking Water*. Elsevier, Inc. Burlington, MA.
- Sullivan, P.J., Agardy, F.J., **Clark, J.J.J.** 2002. *America's Threatened Drinking Water: Hazards and Solutions*. Trafford Publishing, Victoria B.C.
- Clark, J.J.J.** 2001. "TBA: Chemical Properties, Production & Use, Fate and Transport, Toxicology, Detection in Groundwater, and Regulatory Standards" in *Oxygenates in the Environment*. Art Diaz, Ed.. Oxford University Press: New York.
- Clark, J.J.J.** 2000. "Toxicology of Perchlorate" in *Perchlorate in the Environment*. Edward Urbansky, Ed. Kluwer/Plenum: New York.
- Clark, J.J.J.** 1995. Probabilistic Forecasting of Volatile Organic Compound Concentrations At The Soil Surface From Contaminated Groundwater. UMI.
- Baker, J.; **Clark, J.J.J.**; Stanford, J.T. 1994. Ex Situ Remediation of Diesel Contaminated Railroad Sand by Soil Washing. Principles and Practices for Diesel Contaminated Soils, Volume III. P.T. Kostecki, E.J. Calabrese, and C.P.L. Barkan, eds. Amherst Scientific Publishers, Amherst, MA. pp 89-96.

Journal and Proceeding Articles

- Tam L. K., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008) A Statistical Analysis Of Attic Dust And Blood Lipid Concentrations Of Tetrachloro-p-Dibenzodioxin (TCDD) Toxicity Equivalency Quotients (TEQ) In Two Populations Near Wood Treatment Facilities. *Organohalogen Compounds*, Volume 70 (2008) page 002254.
- Tam L. K., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008) Methods For Collect Samples For Assessing Dioxins And Other Environmental Contaminants In Attic Dust: A Review. *Organohalogen Compounds*, Volume 70 (2008) page 000527
- Hensley A.R., Scott, A., Rosenfeld P.E., **Clark, J.J.J.** (2007). "Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility." *Environmental Research*. 105:194-199.
- Rosenfeld, P.E., **Clark, J. J.**, Hensley, A.R., and Suffet, I.H. 2007. "The Use Of An Odor Wheel Classification For The Evaluation of Human Health Risk Criteria For Compost Facilities" *Water Science & Technology*. 55(5): 345-357.
- Hensley A.R., Scott, A., Rosenfeld P.E., **Clark, J.J.J.** 2006. "Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility." The 26th International Symposium on Halogenated Persistent Organic Pollutants –

DIOXIN2006, August 21 – 25, 2006. Radisson SAS Scandinavia Hotel in Oslo Norway.

Rosenfeld, P.E., **Clark, J. J.** and Suffet, I.H. 2005. “The Value Of An Odor Quality Classification Scheme For Compost Facility Evaluations” The U.S. Composting Council’s 13th Annual Conference January 23 - 26, 2005, Crowne Plaza Riverwalk, San Antonio, TX.

Rosenfeld, P.E., **Clark, J. J.** and Suffet, I.H. 2004. “The Value Of An Odor Quality Classification Scheme For Urban Odor” WEFTEC 2004. 77th Annual Technical Exhibition & Conference October 2 - 6, 2004, Ernest N. Morial Convention Center, New Orleans, Louisiana.

Clark, J.J.J. 2003. “Manufacturing, Use, Regulation, and Occurrence of a Known Endocrine Disrupting Chemical (EDC), 2,4-Dichlorophenoxyacetic Acid (2,4-D) in California Drinking Water Supplies.” National Groundwater Association Southwest Focus Conference: Water Supply and Emerging Contaminants. Minneapolis, MN. March 20, 2003.

Rosenfeld, P. and **J.J.J. Clark.** 2003. “Understanding Historical Use, Chemical Properties, Toxicity, and Regulatory Guidance” National Groundwater Association Southwest Focus Conference: Water Supply and Emerging Contaminants. Phoenix, AZ. February 21, 2003.

Clark, J.J.J., Brown A. 1999. Perchlorate Contamination: Fate in the Environment and Treatment Options. In Situ and On-Site Bioremediation, Fifth International Symposium. San Diego, CA, April, 1999.

Clark, J.J.J. 1998. Health Effects of Perchlorate and the New Reference Dose (RfD). Proceedings From the Groundwater Resource Association Seventh Annual Meeting, Walnut Creek, CA, October 23, 1998.

Browne, T., **Clark, J.J.J.** 1998. Treatment Options For Perchlorate In Drinking Water. Proceedings From the Groundwater Resource Association Seventh Annual Meeting, Walnut Creek, CA, October 23, 1998.

Clark, J.J.J., Brown, A., Rodriguez, R. 1998. The Public Health Implications of MtBE and Perchlorate in Water: Risk Management Decisions for Water Purveyors. Proceedings of the National Ground Water Association, Anaheim, CA, June 3-4, 1998.

Clark J.J.J., Brown, A., Ulrey, A. 1997. Impacts of Perchlorate On Drinking Water In The Western United States. U.S. EPA Symposium on Biological and Chemical Reduction of Chlorate and Perchlorate, Cincinnati, OH, December 5, 1997.

Clark, J.J.J.; Corbett, G.E.; Kerger, B.D.; Finley, B.L.; Paustenbach, D.J. 1996. Dermal Uptake of Hexavalent Chromium In Human Volunteers: Measures of Systemic Uptake From Immersion in Water At 22 PPM. Toxicologist. 30(1):14.

- Dodge, D.G.; **Clark, J.J.J.**; Kerger, B.D.; Richter, R.O.; Finley, B.L.; Paustenbach, D.J. 1996. Assessment of Airborne Hexavalent Chromium In The Home Following Use of Contaminated Tapwater. *Toxicologist*. 30(1):117-118.
- Paulo, M.T.; Gong, H., Jr.; **Clark, J.J.J.** (1992). Effects of Pretreatment with Ipratropium Bromide in COPD Patients Exposed to Ozone. *American Review of Respiratory Disease*. 145(4):A96.
- Harber, P.H.; Gong, H., Jr.; Lachenbruch, A.; **Clark, J.**; Hsu, P. (1992). Respiratory Pattern Effect of Acute Sulfur Dioxide Exposure in Asthmatics. *American Review of Respiratory Disease*. 145(4):A88.
- McManus, M.S.; Gong, H., Jr.; Clements, P.; **Clark, J.J.J.** (1991). Respiratory Response of Patients With Interstitial Lung Disease To Inhaled Ozone. *American Review of Respiratory Disease*. 143(4):A91.
- Gong, H., Jr.; Simmons, M.S.; McManus, M.S.; Tashkin, D.P.; Clark, V.A.; Detels, R.; **Clark, J.J.** (1990). Relationship Between Responses to Chronic Oxidant and Acute Ozone Exposures in Residents of Los Angeles County. *American Review of Respiratory Disease*. 141(4):A70.
- Tierney, D.F. and **J.J.J. Clark**. (1990). Lung Polyamine Content Can Be Increased By Spermidine Infusions Into Hyperoxic Rats. *American Review of Respiratory Disease*. 139(4):A41.

EXHIBIT B

HARP2 Risk Results

Risk Calculations For Diesel Exhaust

$$\text{Risk}_{\text{inh-res}} = \text{Dose}_{\text{air}} * \text{CPF} * \text{ASF} * \text{ED}/\text{AT}$$

$$\text{Dose}_{\text{air}} = \text{C}_{\text{air}} * \{\text{BR}/\text{BW}\} * \text{A} * \text{EF} * 10^{-6}$$

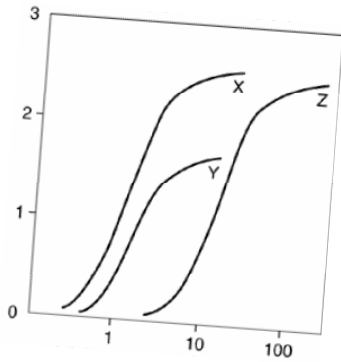
Variable	Description	Units	Value	Variable	Description	Units	Value
Risk _{inh-air}	Residential inhalation cancer risk	Unitless	Calculated	Dose _{air}	Daily inhalation dose	mg/kg-day	Calculated
Dose _{air}	Daily inhalation dose	mg/kg-day	Calculated	C _{air}	Concentration in air	ug/m ³	0.38922
CPF	Inhalation cancer potency factor	(mg/kg-day) ⁻¹	Chemical Specific	{BR/BW}	Daily Breathing rate normalized to body weight	L/kg body weight-day	Calculated
ASF	Age sensitivity factor for a specified age group	Unitless	Calculated	A	Inhalation absorption fraction	Unitless	1
ED	Exposure duration (in years) for a specified age group	years	Calculated	EF	Exposure frequency (days/365 days)	Unitless	Calculated
AT	Averaging time for lifetime cancer risk	years	70	10 ⁻⁶	micrograms to milligrams conversion, liters to cubic meters conversion	Unitless	Calculated
FAH	Fraction of time spent at home	Unitless	Calculated				

Residential Exposures

Age Group	Risk	Age Sensitivity	FAH	ED	CPF	Dose Air	Cair	BR/BW	A	EF
3rd Trimester	3.36E-06	10	0.85	0.25	1.1	0.000100473	0.38922	361	1	0.715068
0<2	8.10E-05	10	0.85	2	1.1	0.000303368	0.38922	1090	1	0.715068
2<9	3.33E-06	3	0.72	0.41	1.1	0.000239633	0.38922	861	1	0.715068
2<16	0.00E+00	3	0.72	0	1.1	0.000207348	0.38922	745	1	0.715068
16<30	2.79E-06	1	0.73	2.61	1.1	9.32369E-05	0.38922	335	1	0.715068
16-70	2.42E-06	1	0.73	2.61	1.1	8.07125E-05	0.38922	290	1	0.715068

3rd trimester to 2.61 **8.77E-05**

2.61 years exposure Adults **2.42E-06**



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James J. J. Clark, Ph.D.

Principal Toxicologist

Toxicology/Exposure Assessment Modeling

Risk Assessment/Analysis/Dispersion Modeling

Education:

Ph.D., Environmental Health Science, University of California, 1995

M.S., Environmental Health Science, University of California, 1993

B.S., Biophysical and Biochemical Sciences, University of Houston, 1987

Professional Experience:

Dr. Clark is a well recognized toxicologist, air modeler, and health scientist. He has 20 years of experience in researching the effects of environmental contaminants on human health including environmental fate and transport modeling (SCREEN3, AEROMOD, ISCST3, Johnson-Ettinger Vapor Intrusion Modeling); exposure assessment modeling (partitioning of contaminants in the environment as well as PBPK modeling); conducting and managing human health risk assessments for regulatory compliance and risk-based clean-up levels; and toxicological and medical literature research.

Significant projects performed by Dr. Clark include the following:

LITIGATION SUPPORT

Case: James Harold Caygle, et al, v. Drummond Company, Inc. Circuit Court for the Tenth Judicial Circuit, Jefferson County, Alabama. Civil Action. CV-2009

Client: Environmental Litigation Group, Birmingham, Alabama

Dr. Clark performed an air quality assessment of emissions from a coke factory located in Tarrant, Alabama. The assessment reviewed include a comprehensive review of air quality standards, measured concentrations of pollutants from factory, an inspection of the facility and detailed assessment of the impacts on the community. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: Rose Roper V. Nissan North America, et al. Superior Court of the State Of California for the County Of Los Angeles – Central Civil West. Civil Action. NC041739

Client: Rose, Klein, Marias, LLP, Long Beach, California

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to multiple chemicals, including benzene, who later developed a respiratory distress. A review of the individual's medical and occupational history was performed to prepare an exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to respiratory irritants. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: O'Neil V. Sherwin Williams, et al. United States District Court Central District of California

Client: Rose, Klein, Marias, LLP, Long Beach, California

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to petroleum distillates who later developed a bladder cancer. A review of the individual's medical and occupational history was performed to prepare a quantitative exposure assessment. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Summary judgment for defendants.

Case: Moore V., Shell Oil Company, et al. Superior Court of the State Of California for the County Of Los Angeles

Client: Rose, Klein, Marias, LLP, Long Beach, California

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to chemicals while benzene who later developed a leukogenic disease. A review of the individual's medical and occupational history was performed to prepare a quantitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to refined petroleum hydrocarbons. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: Raymond Saltonstall V. Fuller O'Brien, KILZ, and Zinsser, et al. United States District Court Central District of California

Client: Rose, Klein, Marias, LLP, Long Beach, California

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to benzene who later developed a leukogenic disease. A review of the individual's medical and occupational history was performed to prepare a quantitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to refined petroleum hydrocarbons. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: Richard Boyer and Elizabeth Boyer, husband and wife, V. DESCO Corporation, et al. Circuit Court of Brooke County, West Virginia. Civil Action Number 04-C-7G.

Client: Frankovitch, Anetakis, Colantonio & Simon, Morgantown, West Virginia.

Dr. Clark performed a toxicological assessment of a family exposed to chlorinated solvents released from the defendant's facility into local drinking water supplies. A review of the individual's medical and occupational history was performed to prepare a qualitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to chlorinated solvents. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: JoAnne R. Cook, V. DESCO Corporation, et al. Circuit Court of Brooke County, West Virginia. Civil Action Number 04-C-9R

Client: Frankovitch, Anetakis, Colantonio & Simon, Morgantown, West Virginia.

Dr. Clark performed a toxicological assessment of an individual exposed to chlorinated solvents released from the defendant's facility into local drinking water supplies. A review of the individual's medical and occupational history was performed to prepare a qualitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to chlorinated solvents. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: Patrick Allen And Susan Allen, husband and wife, and Andrew Allen, a minor, V. DESCO Corporation, et al. Circuit Court of Brooke County, West Virginia. Civil Action Number 04-C-W

Client: Frankovitch, Anetakis, Colantonio & Simon, Morgantown, West Virginia.

Dr. Clark performed a toxicological assessment of a family exposed to chlorinated solvents released from the defendant's facility into local drinking water supplies. A review of the individual's medical and occupational history was performed to prepare a qualitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to chlorinated solvents. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: Michael Fahey, Susan Fahey V. Atlantic Richfield Company, et al. United States District Court Central District of California Civil Action Number CV-06 7109 JCL.

Client: Rose, Klein, Marias, LLP, Long Beach, California

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to refined petroleum hydrocarbons who later developed a leukogenic disease. A review of the individual's medical and occupational history was performed to prepare a qualitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to refined petroleum hydrocarbons. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: Constance Acevedo, et al., V. California Spray-Chemical Company, et al., Superior Court of the State Of California, County Of Santa Cruz. Case No. CV 146344

Dr. Clark performed a comprehensive exposure assessment of community members exposed to toxic metals from a former lead arsenate manufacturing facility. The former manufacturing site had undergone a DTSC mandated removal action/remediation for the presence of the toxic metals at the site. Opinions were presented regarding the elevated levels of arsenic and lead (in attic dust and soils) found throughout the community and the potential for harm to the plaintiffs in question.

Case Result: Settlement in favor of defendant.

Case: Michael Nawrocki V. The Coastal Corporation, Kurk Fuel Company, Pautler Oil Service, State of New York Supreme Court, County of Erie, Index Number I2001-11247

Client: Richard G. Berger Attorney At Law, Buffalo, New York

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to refined petroleum hydrocarbons who later developed a leukogenic disease. A review of the individual's medical and occupational history was performed to prepare a qualitative exposure assessment. The exposure assessment was evaluated against the

known outcomes in published literature to exposure to refined petroleum hydrocarbons. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Judgement in favor of defendant.

SELECTED AIR MODELING RESEARCH/PROJECTS

Client – Confidential

Dr. Clark performed a comprehensive evaluation of criteria pollutants, air toxins, and particulate matter emissions from a carbon black production facility to determine the impacts on the surrounding communities. The results of the dispersion model will be used to estimate acute and chronic exposure concentrations to multiple contaminants and will be incorporated into a comprehensive risk evaluation.

Client – Confidential

Dr. Clark performed a comprehensive evaluation of air toxins and particulate matter emissions from a railroad tie manufacturing facility to determine the impacts on the surrounding communities. The results of the dispersion model have been used to estimate acute and chronic exposure concentrations to multiple contaminants and have been incorporated into a comprehensive risk evaluation.

Client – Los Angeles Alliance for a New Economy (LAANE), Los Angeles, California

Dr. Clark is advising the LAANE on air quality issues related to current flight operations at the Los Angeles International Airport (LAX) operated by the Los Angeles World Airport (LAWA) Authority. He is working with the LAANE and LAX staff to develop a comprehensive strategy for meeting local community concerns over emissions from flight operations and to engage federal agencies on the issue of local impacts of community airports.

Client – City of Santa Monica, Santa Monica, California

Dr. Clark is advising the City of Santa Monica on air quality issues related to current flight operations at the facility. He is working with the City staff to develop a comprehensive strategy for meeting local community concerns over emissions from flight operations and to engage federal agencies on the issue of local impacts of community airports.

Client: Omnitrans, San Bernardino, California

Dr. Clark managed a public health survey of three communities near transit fueling facilities in San Bernardino and Montclair California in compliance with California Senate Bill 1927. The survey included an epidemiological survey of the effected communities, emission surveys of local businesses, dispersion modeling to determine potential emission concentrations within the communities, and a comprehensive risk assessment of each community. The results of the study were presented to the Governor as mandated by Senate Bill 1927.

Client: Confidential, San Francisco, California

Summarized cancer types associated with exposure to metals and smoking. Researched the specific types of cancers associated with exposure to metals and smoking. Provided causation analysis of the association between cancer types and exposure for use by non-public health professionals.

Client: Confidential, Minneapolis, Minnesota

Prepared human health risk assessment of workers exposed to VOCs from neighboring petroleum storage/transport facility. Reviewed the systems in place for distribution of petroleum hydrocarbons to identify chemicals of concern (COCs), prepared comprehensive toxicological summaries of COCs, and quantified potential risks from carcinogens and non-carcinogens to receptors at or adjacent to site. This evaluation was used in the support of litigation.

Client – United Kingdom Environmental Agency

Dr. Clark is part of team that performed comprehensive evaluation of soil vapor intrusion of VOCs from former landfill adjacent residences for the United Kingdom's Environment

Agency. The evaluation included collection of liquid and soil vapor samples at site, modeling of vapor migration using the Johnson Ettinger Vapor Intrusion model, and calculation of site-specific health based vapor thresholds for chlorinated solvents, aromatic hydrocarbons, and semi-volatile organic compounds. The evaluation also included a detailed evaluation of the use, chemical characteristics, fate and transport, and toxicology of chemicals of concern (COC). The results of the evaluation have been used as a briefing tool for public health professionals.

EMERGING/PERSISTENT CONTAMINANT RESEARCH/PROJECTS

Client: Ameren Services, St. Louis, Missouri

Managed the preparation of a comprehensive human health risk assessment of workers and residents at or near an NPL site in Missouri. The former operations at the Property included the servicing and repair of electrical transformers, which resulted in soils and groundwater beneath the Property and adjacent land becoming impacted with PCB and chlorinated solvent compounds. The results were submitted to U.S. EPA for evaluation and will be used in the final ROD.

Client: City of Santa Clarita, Santa Clarita, California

Dr. Clark is managing the oversight of the characterization, remediation and development activities of a former 1,000 acre munitions manufacturing facility for the City of Santa Clarita. The site is impacted with a number of contaminants including perchlorate, unexploded ordinance, and volatile organic compounds (VOCs). The site is currently under a number of regulatory consent orders, including an Imminent and Substantial Endangerment Order. Dr. Clark is assisting the impacted municipality with the development of remediation strategies, interaction with the responsible parties and stakeholders, as well as interfacing with the regulatory agency responsible for oversight of the site cleanup.

Client: Confidential, Los Angeles, California

Prepared comprehensive evaluation of perchlorate in environment. Dr. Clark evaluated the production, use, chemical characteristics, fate and transport, toxicology, and remediation of perchlorate. Perchlorates form the basis of solid rocket fuels and have recently been detected in water supplies in the United States. The results of this research

were presented to the USEPA, National GroundWater, and ultimately published in a recent book entitled *Perchlorate in the Environment*.

Client – Confidential, Los Angeles, California

Dr. Clark is performing a comprehensive review of the potential for pharmaceuticals and their by-products to impact groundwater and surface water supplies. This evaluation will include a review if available data on the history of pharmaceutical production in the United States; the chemical characteristics of various pharmaceuticals; environmental fate and transport; uptake by xenobiotics; the potential effects of pharmaceuticals on water treatment systems; and the potential threat to public health. The results of the evaluation may be used as a briefing tool for non-public health professionals.

PUBLIC HEALTH/TOXICOLOGY

Client: Brayton Purcell, Novato, California

Dr. Clark performed a toxicological assessment of residents exposed to methyl-tertiary butyl ether (MTBE) from leaking underground storage tanks (LUSTs) adjacent to the subject property. The symptomology of residents and guests of the subject property were evaluated against the known outcomes in published literature to exposure to MTBE. The study found that residents had been exposed to MTBE in their drinking water; that concentrations of MTBE detected at the site were above regulatory guidelines; and, that the symptoms and outcomes expressed by residents and guests were consistent with symptoms and outcomes documented in published literature.

Client: Confidential, San Francisco, California

Identified and analyzed fifty years of epidemiological literature on workplace exposures to heavy metals. This research resulted in a summary of the types of cancer and non-cancer diseases associated with occupational exposure to chromium as well as the mortality and morbidity rates.

Client: Confidential, San Francisco, California

Summarized major public health research in United States. Identified major public health research efforts within United States over last twenty years. Results were used as a briefing tool for non-public health professionals.

Client: Confidential, San Francisco, California

Quantified the potential multi-pathway dose received by humans from a pesticide applied indoors. Part of team that developed exposure model and evaluated exposure concentrations in a comprehensive report on the plausible range of doses received by a specific person. This evaluation was used in the support of litigation.

Client: Covanta Energy, Westwood, California

Evaluated health risk from metals in biosolids applied as soil amendment on agricultural lands. The biosolids were created at a forest waste cogeneration facility using 96% whole tree wood chips and 4 percent green waste. Mass loading calculations were used to estimate Cr(VI) concentrations in agricultural soils based on a maximum loading rate of 40 tons of biomass per acre of agricultural soil. The results of the study were used by the Regulatory agency to determine that the application of biosolids did not constitute a health risk to workers applying the biosolids or to residences near the agricultural lands.

Client – United Kingdom Environmental Agency

Oversaw a comprehensive toxicological evaluation of methyl-*tertiary* butyl ether (MtBE) for the United Kingdom's Environment Agency. The evaluation included available data on the production, use, chemical characteristics, fate and transport, toxicology, and remediation of MtBE. The results of the evaluation have been used as a briefing tool for public health professionals.

Client – Confidential, Los Angeles, California

Prepared comprehensive evaluation of *tertiary* butyl alcohol (TBA) in municipal drinking water system. TBA is the primary breakdown product of MtBE, and is suspected to be the primary cause of MtBE toxicity. This evaluation will include available information on the production, use, chemical characteristics, fate and transport in the environment, absorption, distribution, routes of detoxification, metabolites, carcinogenic potential, and remediation of TBA. The results of the evaluation were used as a briefing tool for non-public health professionals.

Client – Confidential, Los Angeles, California

Prepared comprehensive evaluation of methyl *tertiary* butyl ether (MTBE) in municipal drinking water system. MTBE is a chemical added to gasoline to increase the octane

rating and to meet Federally mandated emission criteria. The evaluation included available data on the production, use, chemical characteristics, fate and transport, toxicology, and remediation of MTBE. The results of the evaluation have been used as a briefing tool for non-public health professionals.

Client – Ministry of Environment, Lands & Parks, British Columbia

Dr. Clark assisted in the development of water quality guidelines for methyl tertiary-butyl ether (MTBE) to protect water uses in British Columbia (BC). The water uses to be considered includes freshwater and marine life, wildlife, industrial, and agricultural (e.g., irrigation and livestock watering) water uses. Guidelines from other jurisdictions for the protection of drinking water, recreation and aesthetics were to be identified.

Client: Confidential, Los Angeles, California

Prepared physiologically based pharmacokinetic (PBPK) assessment of lead risk of receptors at middle school built over former industrial facility. This evaluation is being used to determine cleanup goals and will be basis for regulatory closure of site.

Client: Kaiser Venture Incorporated, Fontana, California

Prepared PBPK assessment of lead risk of receptors at a 1,100-acre former steel mill. This evaluation was used as the basis for granting closure of the site by lead regulatory agency.

RISK ASSESSMENTS/REMEDIAL INVESTIGATIONS

Client: Confidential, Atlanta, Georgia

Researched potential exposure and health risks to community members potentially exposed to creosote, polycyclic aromatic hydrocarbons, pentachlorophenol, and dioxin compounds used at a former wood treatment facility. Prepared a comprehensive toxicological summary of the chemicals of concern, including the chemical characteristics, absorption, distribution, and carcinogenic potential. Prepared risk characterization of the carcinogenic and non-carcinogenic chemicals based on the exposure assessment to quantify the potential risk to members of the surrounding community. This evaluation was used to help settle class-action tort.

Client: Confidential, Escondido, California

Prepared comprehensive Preliminary Endangerment Assessment (PEA) of dense non-aqueous liquid phase hydrocarbon (chlorinated solvents) contamination at a former printed circuit board manufacturing facility. This evaluation was used for litigation support and may be used as the basis for reaching closure of the site with the lead regulatory agency.

Client: Confidential, San Francisco, California

Summarized epidemiological evidence for connective tissue and autoimmune diseases for product liability litigation. Identified epidemiological research efforts on the health effects of medical prostheses. This research was used in a meta-analysis of the health effects and as a briefing tool for non-public health professionals.

Client: Confidential, Bogotá, Columbia

Prepared comprehensive evaluation of the potential health risks associated with the redevelopment of a 13.7 hectares plastic manufacturing facility in Bogotá, Colombia. The risk assessment was used as the basis for the remedial goals and closure of the site.

Client: Confidential, Los Angeles, California

Prepared comprehensive human health risk assessment of students, staff, and residents potentially exposed to heavy metals (principally cadmium) and VOCs from soil and soil vapor at 12-acre former crude oilfield and municipal landfill. The site is currently used as a middle school housing approximately 3,000 children. The evaluation determined that the site was safe for the current and future uses and was used as the basis for regulatory closure of site.

Client: Confidential, Los Angeles, California

Managed remedial investigation (RI) of heavy metals and volatile organic chemicals (VOCs) for a 15-acre former manufacturing facility. The RI investigation of the site included over 800 different sampling locations and the collection of soil, soil gas, and groundwater samples. The site is currently used as a year round school housing approximately 3,000 children. The Remedial Investigation was performed in a manner

that did not interrupt school activities and met the time restrictions placed on the project by the overseeing regulatory agency. The RI Report identified the off-site source of metals that impacted groundwater beneath the site and the sources of VOCs in soil gas and groundwater. The RI included a numerical model of vapor intrusion into the buildings at the site from the vadose zone to determine exposure concentrations and an air dispersion model of VOCs from the proposed soil vapor treatment system. The Feasibility Study for the Site is currently being drafted and may be used as the basis for granting closure of the site by DTSC.

Client: Confidential, Los Angeles, California

Prepared comprehensive human health risk assessment of students, staff, and residents potentially exposed to heavy metals (principally lead), VOCs, SVOCs, and PCBs from soil, soil vapor, and groundwater at 15-acre former manufacturing facility. The site is currently used as a year round school housing approximately 3,000 children. The evaluation determined that the site was safe for the current and future uses and will be basis for regulatory closure of site.

Client: Confidential, Los Angeles, California

Prepared comprehensive evaluation of VOC vapor intrusion into classrooms of middle school that was former 15-acre industrial facility. Using the Johnson-Ettinger Vapor Intrusion model, the evaluation determined acceptable soil gas concentrations at the site that did not pose health threat to students, staff, and residents. This evaluation is being used to determine cleanup goals and will be basis for regulatory closure of site.

Client –Dominguez Energy, Carson, California

Prepared comprehensive evaluation of the potential health risks associated with the redevelopment of 6-acre portion of a 500-acre oil and natural gas production facility in Carson, California. The risk assessment was used as the basis for closure of the site.

Kaiser Ventures Incorporated, Fontana, California

Prepared health risk assessment of semi-volatile organic chemicals and metals for a fifty-year old wastewater treatment facility used at a 1,100-acre former steel mill. This evaluation was used as the basis for granting closure of the site by lead regulatory agency.

ANR Freight - Los Angeles, California

Prepared a comprehensive Preliminary Endangerment Assessment (PEA) of petroleum hydrocarbon and metal contamination of a former freight depot. This evaluation was as the basis for reaching closure of the site with lead regulatory agency.

Kaiser Ventures Incorporated, Fontana, California

Prepared comprehensive health risk assessment of semi-volatile organic chemicals and metals for 23-acre parcel of a 1,100-acre former steel mill. The health risk assessment was used to determine clean up goals and as the basis for granting closure of the site by lead regulatory agency. Air dispersion modeling using ISCST3 was performed to determine downwind exposure point concentrations at sensitive receptors within a 1 kilometer radius of the site. The results of the health risk assessment were presented at a public meeting sponsored by the Department of Toxic Substances Control (DTSC) in the community potentially affected by the site.

Unocal Corporation - Los Angeles, California

Prepared comprehensive assessment of petroleum hydrocarbons and metals for a former petroleum service station located next to sensitive population center (elementary school). The assessment used a probabilistic approach to estimate risks to the community and was used as the basis for granting closure of the site by lead regulatory agency.

Client: Confidential, Los Angeles, California

Managed oversight of remedial investigation most contaminated heavy metal site in California. Lead concentrations in soil excess of 68,000,000 parts per billion (ppb) have been measured at the site. This State Superfund Site was a former hard chrome plating operation that operated for approximately 40-years.

Client: Confidential, San Francisco, California

Coordinator of regional monitoring program to determine background concentrations of metals in air. Acted as liaison with SCAQMD and CARB to perform co-location sampling and comparison of accepted regulatory method with ASTM methodology.

Client: Confidential, San Francisco, California

Analyzed historical air monitoring data for South Coast Air Basin in Southern California and potential health risks related to ambient concentrations of carcinogenic metals and volatile organic compounds. Identified and reviewed the available literature and calculated risks from toxins in South Coast Air Basin.

IT Corporation, North Carolina

Prepared comprehensive evaluation of potential exposure of workers to air-borne VOCs at hazardous waste storage facility under SUPERFUND cleanup decree. Assessment used in developing health based clean-up levels.

Professional Associations

American Public Health Association (APHA)

Association for Environmental Health and Sciences (AEHS)

American Chemical Society (ACS)

California Redevelopment Association (CRA)

International Society of Environmental Forensics (ISEF)

Society of Environmental Toxicology and Chemistry (SETAC)

Publications and Presentations:

Books and Book Chapters

Sullivan, P., **J.J. J. Clark**, F.J. Agardy, and P.E. Rosenfeld. (2007). *Synthetic Toxins In The Food, Water and Air of American Cities*. Elsevier, Inc. Burlington, MA.

Sullivan, P. and **J.J. J. Clark**. 2006. *Choosing Safer Foods, A Guide To Minimizing Synthetic Chemicals In Your Diet*. Elsevier, Inc. Burlington, MA.

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Sullivan, P.J., Agardy, F.J., **Clark, J.J.J.** 2002. *America's Threatened Drinking Water: Hazards and Solutions*. Trafford Publishing, Victoria B.C.

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Clark, J.J.J. 2000. "Toxicology of Perchlorate" in *Perchlorate in the Environment*. Edward Urbansky, Ed. Kluwer/Plenum: New York.

Clark, J.J.J. 1995. Probabilistic Forecasting of Volatile Organic Compound Concentrations At The Soil Surface From Contaminated Groundwater. UMI.

Baker, J.; **Clark, J.J.J.**; Stanford, J.T. 1994. Ex Situ Remediation of Diesel Contaminated Railroad Sand by Soil Washing. Principles and Practices for Diesel Contaminated Soils, Volume III. P.T. Kostecki, E.J. Calabrese, and C.P.L. Barkan, eds. Amherst Scientific Publishers, Amherst, MA. pp 89-96.

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- Tam L. K., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008) A Statistical Analysis Of Attic Dust And Blood Lipid Concentrations Of Tetrachloro-p-Dibenzodioxin (TCDD) Toxicity Equivalency Quotients (TEQ) In Two Populations Near Wood Treatment Facilities. *Organohalogen Compounds*, Volume 70 (2008) page 002254.
- Tam L. K., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008) Methods For Collect Samples For Assessing Dioxins And Other Environmental Contaminants In Attic Dust: A Review. *Organohalogen Compounds*, Volume 70 (2008) page 000527
- Hensley A.R., Scott, A., Rosenfeld P.E., **Clark, J.J.J.** (2007). "Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility." *Environmental Research*. 105:194-199.
- Rosenfeld, P.E., **Clark, J. J.**, Hensley, A.R., and Suffet, I.H. 2007. "The Use Of An Odor Wheel Classification For The Evaluation of Human Health Risk Criteria For Compost Facilities" *Water Science & Technology*. 55(5): 345-357.
- Hensley A.R., Scott, A., Rosenfeld P.E., **Clark, J.J.J.** 2006. "Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility." The 26th International Symposium on Halogenated Persistent Organic Pollutants – DIOXIN2006, August 21 – 25, 2006. Radisson SAS Scandinavia Hotel in Oslo Norway.
- Rosenfeld, P.E., **Clark, J. J.** and Suffet, I.H. 2005. "The Value Of An Odor Quality Classification Scheme For Compost Facility Evaluations" The U.S. Composting Council's 13th Annual Conference January 23 - 26, 2005, Crowne Plaza Riverwalk, San Antonio, TX.
- Rosenfeld, P.E., **Clark, J. J.** and Suffet, I.H. 2004. "The Value Of An Odor Quality Classification Scheme For Urban Odor" WEFTEC 2004. 77th Annual Technical Exhibition & Conference October 2 - 6, 2004, Ernest N. Morial Convention Center, New Orleans, Louisiana.
- Clark, J.J.J.** 2003. "Manufacturing, Use, Regulation, and Occurrence of a Known Endocrine Disrupting Chemical (EDC), 2,4-Dichlorophenoxyacetic Acid (2,4-D) in California Drinking Water Supplies." National Groundwater Association Southwest Focus Conference: Water Supply and Emerging Contaminants. Minneapolis, MN. March 20, 2003.

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- Browne, T., **Clark, J.J.J.** 1998. Treatment Options For Perchlorate In Drinking Water. Proceedings From the Groundwater Resource Association Seventh Annual Meeting, Walnut Creek, CA, October 23, 1998.
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- Clark J.J.J.**, Brown, A., Ulrey, A. 1997. Impacts of Perchlorate On Drinking Water In The Western United States. U.S. EPA Symposium on Biological and Chemical Reduction of Chlorate and Perchlorate, Cincinnati, OH, December 5, 1997.
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Ozone Exposures in Residents of Los Angeles County. American Review of Respiratory Disease. 141(4):A70.

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EXHIBIT B



WI #22-005.XX

October 20, 2022

Aidan P. Marshall
Adams Broadwell Joseph & Cardozo
520 Capitol Mall, Suite 350
Sacramento, CA 95814

SUBJECT: 1050 La Cienega Project Sustainable Communities Environmental Assessment, Comments on the Noise Analysis

Dear Mr. Marshall,

Per your request, I have reviewed the subject matter document for the 1050 La Cienega Project in Los Angeles, CA. The proposed Project would construct a mixed-use development with 290 residential units and 7,500 square feet of restaurant commercial use in a 28-story building.

The project is bordered by a 1-story commercial building to the north, 2-story residential buildings to the east, a 3-story commercial building to the south, and La Cienega Blvd. to the west. Across La Cienega Blvd, there is a parking lot, 3-story religious building (Temple Beth Am), 4-story educational building (Pressman Education Center and Academy) and a 4-story residential building with senior housing.

Baseline Noise Levels are not Properly Established

The noise analysis in Appendix H shows noise measurement locations on La Cienega Blvd. One measurement was taken at the project site, and another was taken by the Beverly Park Senior Apartments. No measurements were taken on S. Alfred Street where there are numerous residential receptors. Noise levels on S. Alfred Street could be as much as 10 dB lower than on La Cienega Blvd. due distance from La Cienega, lower traffic volume on S. Alfred Street, and shielding from La Cienega provided by existing structure. Additionally, no information is provided regarding the time of day the measurements were taken or the length of the measurements.

Construction Noise Analysis is Incomplete

The construction noise analysis only considers the grading phase of work. This work would occur at or below grade level where sound barriers would be most effective. The Los Angeles Municipal Code section 112.05 imposes a limit of 75 dBA at 50 ft for construction activities occurring between 7 am and 10 pm. The SCEA shows sound levels above 75 dBA from excavation, auger-cast pile installation, and DSM column installation without mitigation. The proposed mitigation measures include the used of 15-20 ft tall sound barriers along the project's eastern boundary, shielding the residences on S.

Alfred Street. According to the noise analysis in the SCEA, this would reduce the construction noise levels to below 75 dBA.

In order for sound barriers to be effective, they must block the line of sight between the source and the receiver. As the 28-story tower is erected, construction work would occur above the height of the tallest proposed barrier. There would be a direct line of sight to sensitive receptors. No calculations are presented for these phases of work and there is no evidence provided to show the sound level would be below the 75 dBA criteria.

We calculated the noise level from the tower construction to the residences on S. Alfred Street. The calculation is shown below. An Leq noise level of 79 dBA was calculated at the S. Alfred Street residences. This exceeds the 75 dBA criteria.

Table 1. Calculated Tower Construction Noise Levels at S. Alfred Street Residences

<u>Equipment</u>	RCNM Ref Values @ 50 ft			Noise Level @ 50 ft			Noise Level @ S. Alfred Street Residences		
	<u>Lmax</u>	<u>Util%</u>	<u>No.</u>	<u>Distance</u>	<u>Lmax</u>	<u>Leq</u>	<u>Distance</u>	<u>Lmax</u>	<u>Leq</u>
Crane	81.0	16%	1	50 ft	81	73	90	76	68
Welder / Torch	73.0	40%	1	50 ft	73	69	90	68	64
Generator	81.0	50%	1	50 ft	81	78	90	76	73
Pneumatic Tools	85.0	50%	1	50 ft	85	82	90	80	77
Man Lift	75.0	20%	1	50 ft	75	68	90	70	63
Total					85	84		80	79

This would be a *potentially significant* impact from construction noise that could require mitigation.

Operational Noise Analysis is Lacking

Sources of operational noise for this project include sound from the mechanical system, as well as sound from use of the pool terrace and roof deck.

Mechanical Equipment

The noise from mechanical equipment has not been evaluated. The noise analysis states “it is unlikely that the Project’s HVAC systems would be capable of increasing off-site noise levels by a discernable degree”. Based on our experience with similar projects, there would be several pieces of mechanical equipment which could generate audible noise off-site.

In our experience, typical mechanical equipment for this type of project includes garage exhaust fans, an emergency generator, and air handling units. An emergency generator could have a typical sound rating of 105 sound power level (PWL). This could generate a sound level of 71 dBA at a distance of 50 ft. The noise analysis states a 5 dB threshold of significance and lists the calculated ambient sound level on S. Alfred Street as 62 dBA. This would be a *significant impact* and would require mitigation.

Pool Deck/Terrace

The analysis of the pool deck & terrace relies on “reasonable use” and only considers a single person talking. It is more realistic to assume multiple occupants speaking at the same time. It is feasible this space could be used for parties and gatherings. It is also possible this space would be used in the evening and at night when there are lower ambient sound levels.

Excluding the effect of background music and shielding, 25 voices in “normal” conversation would generate 59 dBA at a distance of 30 ft. However, the existing ambient sound levels are elevated and may cause people to speak louder to be heard over traffic noise. With 25 “raised” voices, the resulting sound level would be approximately 65 dBA at a distance of 30 ft, and a sound level of 72 dBA would be generated by 5 people shouting.

No information has been provided regarding the time of day the baseline measurements were taken. To properly establish ambient sound levels, measurements should be taken over a minimum period of 24 hours. This allows for ambient sound levels to be determined for daytime and evening or nighttime hours. In the absence of ambient data during evening or nighttime hours, these levels could be much more than 5 dBA above the existing ambient. Thus, the noise from the pool deck/terrace would be ***potentially significant*** and would require mitigation.

Sleep Disturbance Threshold is Missing

Any nighttime activities should also be evaluated for potential sleep disturbance which could be caused by social events at the rooftop terrace areas. Sleep disturbance being noises which may not cause a person to become fully awake, but instead change a person’s sleep from one deeper level of sleep to a less restful level of sleep. Although the health effects of noise are not taken as seriously in the United States as they are in other countries, they are real and, in many parts of the country, pervasive. Noise can disturb sleep by making it more difficult to fall asleep, by waking someone after they are asleep, or by altering their sleep stage, e.g., reducing the amount of rapid eye movement (REM) sleep. Noise exposure for people who are sleeping has also been linked to increased blood pressure, increased heart rate, increase in body movements, and other physiological effects. Not surprisingly, people whose sleep is disturbed by noise often experience secondary effects such as increased fatigue, depressed mood, and decreased work performance.

Thus, excessive noise from rooftop activities occurring between 10 PM and 7 AM could cause sleep disturbance and would be potentially significant. The World Health Organization¹ identifies a guidance of 45 dBA Leq (outdoors) to avoid sleep disturbance from a continuous source, and a limit of 60 dBA Lmax for intermittent sources². However, it has been our experience that low frequency bass notes, commonly found in music played at lounges, can be problematic even when the A-weighted level complies with applicable code. This is partly because the low frequencies pass through the exterior walls and closed windows with little reduction. To illustrate this issue, Figure 1 shows noise measurement taken when music was playing at a hotel rooftop/poolside lounge. The nearby plaza was at ground level about 150 to 250 ft from the nearest subwoofers. Even several blocks away the low frequency pulse of the music was 6 decibels higher than the non-music ambient.

¹ <https://www.who.int/docstore/peh/noise/Comnoise-1.pdf>

² These outdoor levels assume that the residence reduces noise by 15 dBA with windows open, which is typical for conventional construction.

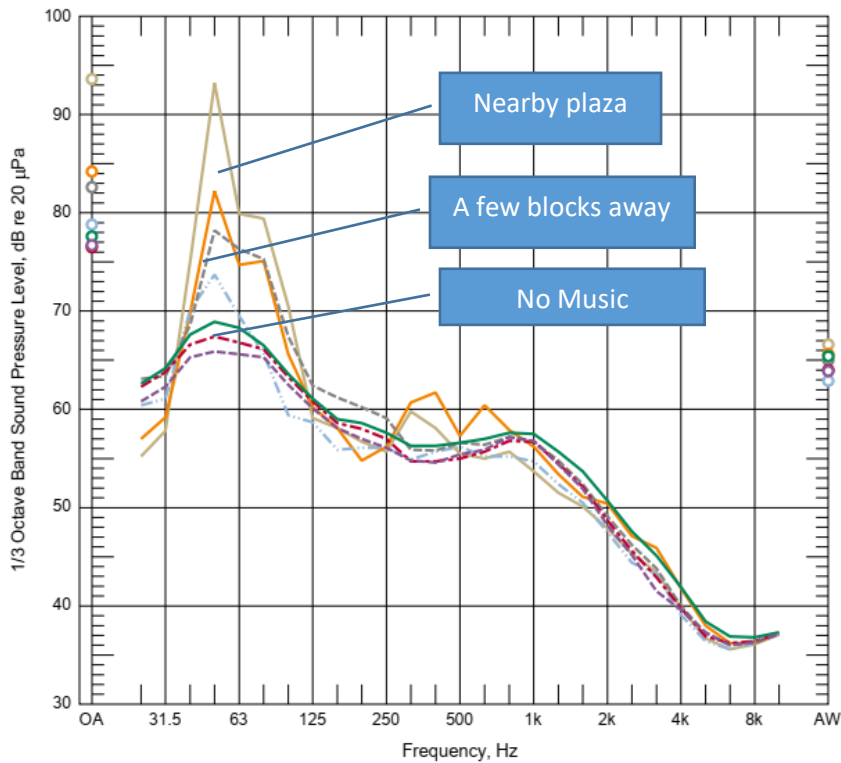


Figure 1 Sample Exterior Noise Near an Urban Hotel Lounge (L_{25})

Assuming music was played at a level of 85 dBA on the terrace, the sound from music would be 78 dBA at a distance of 30 ft. This is more than 5 dBA above the reported ambient sound level of 62 dBA. It is also well above the WHO guideline of 60 dBA to avoid sleep disturbance. This would potentially lead to a substantial and significant noise impact.

Per the SCEA requirements³, the SCEA is required to identify, analyze and mitigate any potentially significant or significant effects :

³ <https://codes.findlaw.com/ca/public-resources-code/prc-sect-21155-2.html>

(a) A transit priority project that has incorporated all feasible mitigation measures, performance standards, or criteria set forth in the prior applicable environmental impact reports and adopted in findings made pursuant to [Section 21081](#), shall be eligible for either the provisions of subdivision (b) or (c).

(b) A transit priority project that satisfies the requirements of subdivision (a) may be reviewed through a sustainable communities environmental assessment as follows:

(1) An initial study shall be prepared to identify all significant or potentially significant impacts of the transit priority project, other than those which do not need to be reviewed pursuant to [Section 21159.28](#) based on substantial evidence in light of the whole record. The initial study shall identify any cumulative effects that have been adequately addressed and mitigated pursuant to the requirements of this division in prior applicable certified environmental impact reports. Where the lead agency determines that a cumulative effect has been adequately addressed and mitigated, that cumulative effect shall not be treated as cumulatively considerable for the purposes of this subdivision.

(2) The sustainable communities environmental assessment shall contain measures that either avoid or mitigate to a level of insignificance all potentially significant or significant effects of the project required to be identified in the initial study.

Figure 1 California Code, Public Resources Code - PRC § 21155.2

Thus, a project that has significant, or **potentially significant**, effects must be mitigated below the threshold of significance.

Conclusions

There are several errors and omissions in the SCEA noise analysis. Correcting these would potentially identify several significant impacts which require mitigation.

Please feel free to contact me with any questions on this information.

Very truly yours,

WILSON IHRIG

Jennifer Levins

Jennifer Levins
Senior Consultant

JENNIFER LEVINS

Senior Consultant

Jennifer joined the firm with over 15 years of experience in architectural acoustics. She has worked across the country from New York City to Los Angeles, and now is based in Seattle. She has consulted on a wide variety of projects including multi-family housing, private residential, commercial, educational, and performing arts centers. She completed original research on impact noise of floors, comparing partial vs. full installations. This was presented at the 2017 ASA conference in Boston.

Education

- BSE, University of Hartford, Acoustical Engineering and Music

Professional Associations / Licenses

- Acoustical Society of America (ASA)
-

Project Experience (*Prior to Joining Wilson Ihrig)

- *Clara Gardens, Santa Clara, CA*
- *Choice in Aging, Pleasant Hill, CA*
- *Lot 12, Mountain View, CA*
- *3050 International, Oakland, CA*
- *1868 Ogden, Burlingame, CA*
- *The Kelsey, San Francisco, CA*
- *TENTEN Hollywood*
- *Ivy Station, Culver City, CA**
- *Wilshire Gayley, Los Angeles, CA**
- *The Hoxton, Los Angeles, CA**
- *The Artise, Bellevue, WA**
- *Adaptive Biotechnologies, Seattle, WA**
- *Residential Property for a Confidential Developer, CA**
- *The Colony at Mandalay Beach, Oxnard, CA**
- *Sea Colony II, Santa Monica, CA**
- *45-47 Great Jones, New York, NY**
- *84 Field Point Circle, Greenwich, CT**
- *41° North Hotel, Newport, RI**
- *Shelter Haven, Stone Harbor, NJ**
- *Schaeffer Auditorium, Kutztown University, Kutztown, PA**
- *GlaxoSmithKline Radex Leadership Hub, Radnor, PA**
- *Lincoln University International Cultural Center, Lincoln, PA**
- *The Willow School, Gladstone, NJ**

ATTACHMENT B

ADAMS BROADWELL JOSEPH & CARDOZO

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January 24, 2023

Via Email and Overnight Mail

City of Los Angeles Hearing Officer
C/O Oliver Netburn, City Planner
City of Los Angeles, Department of City Planning
200 North Spring Street, Room. 763
Los Angeles, CA 90012

E-mail: oliver.netburn@lacity.org

**Re: Comments on Agenda Item # 4 – 1050 La Cienega Boulevard
Project (Case Nos. ENV-2022-2280-SCEA; DIR-2022-2279-TOC-SPR-
VHCA; SCH No. 2022090143).**

Dear Honorable Hearing Officer, Mr. Netburn:

We are writing on behalf of Coalition for Responsible Equitable Economic Development Los Angeles (“CREED LA”) to provide comments on the 1050 La Cienega Boulevard Project (Case Nos. ENV-2022-2280-SCEA; DIR-2022-2279-TOC-SPR-VHCA; SCH No. 2022090143) (“Project”), proposed by 1050 La Cienega, LLC (“Applicant”). The Project’s Site Plan Review and Density Bonus will be considered at the January 24, 2023 Hearing Officer hearing as Agenda Item #4.

The Hearing Officer may not approve the Project’s Site Plan Review, density increases, or incentives until the City remedies the procedural and substantive defects in the Project’s piecemealed environmental review and permitting process, and until the City fully mitigates the Project’s significant environmental and public health impacts that were not disclosed or mitigated in the Project’s Sustainable Communities Environmental Assessment (“SCEA”).

The Project’s approval process violates CEQA and the City’s municipal code in several ways. First, the City improperly segmented approval of the Project’s CEQA document from its underlying entitlements, which are being considered and approved at separate times by separate decisionmakers. This process makes adequate review of the Project’s impacts impossible. The City Council’s November 22, 2022 “certification” of SCEA was also premature and in violation of CEQA because the Project’s underlying permits have not yet been considered or approved

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by the decision making body, the Hearing Officer. Premature CEQA approval prior to project approval has no legal effect and will not trigger the CEQA statute of limitations or CEQA's substantive review standards for subsequent project approvals.¹ The Staff Report erroneously asks the Hearing Officer to make CEQA findings pursuant to CEQA Guidelines Sections 15162 and 15164 that no subsequent EIR, negative declaration, or addendum is required for approval of the Project based on the City Council's premature certification of the SCEA.

Second, the SCEA approved by the City Council failed to comply with CEQA's requirements because it failed to disclose and mitigate impacts that the City was required to address under Public Resources Code Section 21155.2. CREED LA submitted extensive written and expert comments on the SCEA on October 21, 2022 which demonstrated that the Project has potentially significant impacts in several key areas, including health risk, noise, energy, and hazards, and that SCEA lacked required measures to avoid or mitigate those impacts to a level of insignificance.² In our review of the SCEA and the City's responses to comments, we received technical assistance from air quality and health risk expert James Clark, Ph.D,³ and noise expert Ani Toncheva.⁴ As explained herein and in the attached expert comments, the City Council's CEQA findings were not supported by substantial evidence because the City failed to revised or recirculate the SCEA to correct these deficiencies before it was certified by the Council.

Finally, the City's Municipal Code ("LAMC") prohibits the Hearing Officer from approving the Project's underlying entitlements if the Project has significant environmental and public health impacts, as here.⁵ The Hearing Officer therefore lacks substantial evidence to make the findings necessary under the LAMC to approve the Project's entitlements.

As a result of these substantive and procedural flaws, the Hearing Officer cannot approve the Project's entitlements at this time. Pursuant to the Hearing Officer's duty to proceed in the manner required by law, and to not approve the Project's entitlements unless "an appropriate environmental review clearance has

¹ *Coalition for Clean Air v. City of Visalia* (2012) 209 Cal.App.4th 408, 418-25 (NOE posted prior to final project approval is invalid, and must be set aside); *County of Amador v. El Dorado County Water Agency* (1999) 76 Cal.App.4th 931, 962.

² Pub. Res. Code § 21155.2(b)(1).

³ Dr. Clark's technical comments and curricula vitae are attached hereto as **Exhibit A** ("Clark Comments")

⁴ Ms. Toncheva's technical comments and curricula vitae are attached hereto as **Exhibit B** ("Toncheva Comments")

⁵ LAMC Section 16.05(E), (F).

been prepared in accordance with the requirements of CEQA,”⁶ CREED LA respectfully requests that the Hearing Officer vacate the City Council’s certification of the SCEA and continue the hearing to a future date to allow for adequate consideration of the Project’s environmental impacts before considering approval of the Project’s land use permits.

I. STATEMENT OF INTEREST

CREED LA is an unincorporated association of individuals and labor organizations that may be adversely affected by the potential public and worker health and safety hazards, and the environmental impacts of the Project. The coalition includes the Sheet Metal Workers Local 105, International Brotherhood of Electrical Workers Local 11, Southern California Pipe Trades District Council 16, and District Council of Iron Workers of the State of California, along with their members, their families, and other individuals who live and work in the City of Los Angeles.

Individual members of CREED LA and its member organizations live, work, recreate, and raise their families in the City of Los Angeles and surrounding communities. Accordingly, they would be directly affected by the Project’s environmental and health and safety impacts. Individual members may also work on the Project itself. They will be first in line to be exposed to any health and safety hazards that exist onsite.

CREED LA seeks to ensure a sustainable construction industry over the long-term by supporting projects that have positive impacts for the community, and which minimize adverse environmental and public health impacts. CREED LA has an interest in enforcing environmental laws that encourage sustainable development and ensure a safe working environment for its members. Environmentally detrimental projects can jeopardize future jobs by making it more difficult and more expensive for business and industry to expand in the region, and by making the area less desirable for new businesses and new residents. Indeed, continued environmental degradation can, and has, caused construction moratoriums and other restrictions on growth that, in turn, reduce future employment opportunities.

⁶ LAMC Section 16.05(E)(4).

II. PROCEDURAL BACKGROUND

On September 8, 2022, the City of Los Angeles released the SCEA for public review. CREED LA filed comments⁷ on the SCEA during the initial comment period, which closed on October 21, 2022.⁸ CREED LA's comments demonstrated that the SCEA failed to comply with the requirements of CEQA.⁹

On October 21, 2022, the City provided CREED LA with notice that the SCEA would be considered by the Planning and Land Use Management ("PLUM") Committee on November 1, 2022 at 2:00 PM. At 11:32 AM on November 1, 2022, the Applicant uploaded to the City Council file a letter responding to our and other commenters' comments, which CREED LA did not receive until the PLUM hearing had concluded.¹⁰ The Applicant's letter also included revisions to the Project's conditions of approval, of which CREED LA did not receive notice.¹¹

On November 1, 2022, the PLUM Committee considered the SCEA, and recommended that the City Council approve the SCEA. On November 21, 2022, the Applicant uploaded additional responses to comments to the City Council file. On November 22, 2022, the City Council approved the SCEA on its consent calendar, without taking public comment. The City failed to provide CREED LA with notice of the hearing. The City Council did not consider the Project's underlying entitlements at the hearing.

At the January 24 hearing, on behalf of the Director of Planning, the Hearing Officer will consider the following:

⁷ Our initial comments on the SCEA are attached as **Exhibit C**.

⁸ Los Angeles City Planning website, 1050 La Cienega Boulevard Project, <https://planning.lacity.org/development-services/environmental-review/scea/1050-la-cienega-boulevard-project>.

⁹ Letter from CREED LA to City, re: Comments on the Sustainable Communities Environmental Assessment for the 1050 La Cienega Boulevard Project (SCH No. 2022090143; Case Nos. ENV-2022-2280-SCEA; DIR-2022-2279-TOC-SPR-VHCA) (October 21, 2022).

¹⁰ November 1, 2022, Applicant's Responses to Comments, available at https://clkrep.lacity.org/onlinedocs/2022/22-1098_PC_PM_11-01-2022.pdf.

¹¹ Applicant's Responses to Comments, pg. 7, stating: "Notwithstanding the above, in response to the CREED LA Letter's concerns regarding haul route specificity, revisions to Project Design Feature PDF-Trans-1 have been made, which clarify the Construction Traffic Management Plan's haul route as follows (underlined text are additions): PDF-Trans-1: Prepare a haul truck route program that specifies the construction truck routes to and from the Project site that minimizes travel on local streets. Construction trucks would take the most direct route and travel along La Cienega Boulevard between the Project Site and the I10 ramps."

1. Based on the whole of the administrative record, that the project was assessed in Case No. ENV-2022-2280-SCEA, adopted on November 22, 2022; and pursuant to CEQA Guidelines, Sections 15162 and 15164, no subsequent EIR, negative declaration, or addendum is required for approval of the project,
2. Pursuant to Los Angeles Municipal Code (LAMC) Section 12.22 A.31, up to an 70 percent increase in residential density, a Floor Area Ratio of 3.75 to 1, and permitting the required parking for all residential units to not exceed 0.5 space per unit and up to a 30% reduction in the nonresidential parking requirement consistent with the provisions of the Transit Oriented Communities Affordable Housing Incentive Program for a qualifying Tier 3 housing development project totaling 290 units reserving 29 units for Extremely Low Income households, and with the following one (1) Additional Incentives: utilization of the RAS3 Zone setbacks;
3. Pursuant to LAMC Section 16.05, Site Plan Review for a development project creating 50 or more residential dwelling units.

III. THE HEARING OFFICER'S RELIANCE ON CEQA'S SUBSEQUENT REVIEW STANDARDS TO SUPPORT CEQA FINDINGS FOR INITIAL PROJECT APPROVAL VIOLATES CEQA

The Hearing Officer will consider whether, based on the whole of the administrative record, that the project was assessed and adopted by the City Council, and that the Project is not subject to further CEQA review under CEQA's subsequent review standards. This finding would violate multiple CEQA principles and would be invalid as a matter of law.

The Hearing Officer cannot find that the Project's SCEA was properly assessed and adopted by the City Council because the SCEA was not approved by the same body that will approve the project entitlements. Courts have explained that "[a] decision on both matters must be made by the same decision-making body because '... CEQA is violated when the authority to approve or disapprove the project is separated from the responsibility to complete the environmental review.'"¹² In *POET, LLC v. State Air Resources Bd.* (2013) 218 Cal.App.4th 681, 731, the court explained:

¹² *Citizens for the Restoration of L Street v. City of Fresno* (2014) 229 Cal.App.4th 340, 360, citing *POET, LLC v. State Air Resources Bd.* (2013) 218 Cal.App.4th 681, 731; see *Clews Land & Livestock, LLC v. City of San Diego* (2017) 19 Cal.App.5th 161, 188 ("for an environmental review document to serve CEQA's basic purpose of informing governmental decision makers about environmental issues,

For an environmental review document to serve CEQA's basic purpose of informing governmental decision makers about environmental issues, that document must be reviewed and considered by the same person or group of persons who make the decision to approve or disapprove the project at issue. In other words, the separation of the approval function from the review and consideration of the environmental assessment is inconsistent with the purpose served by an environmental assessment as it insulates the person or group approving the project 'from public awareness and the possible reaction to the individual members' environmental and economic values.

Here, the Project's SCEA was approved by the City Council on November 22, 2022, whereas the project entitlements (a Site Plan Review and TOC Approval) will first be considered at the January 24, 2023 Hearing Officer hearing. This process violates the principles articulated in the above-referenced cases.

If the Hearing Officer's assessment of the Project's environmental impacts is limited to finding that the SCEA was assessed and adopted by the City Council, the Hearing Officer cannot make essential findings necessary to approve the Project's entitlements. Section 16.05 of the Los Angeles Municipal Code requires the Director to make several findings that require assessment of the Project's environmental impacts.¹³ And the stated purposes of Site Plan Review are:

to promote orderly development, evaluate and mitigate significant environmental impacts, and promote public safety and the general welfare by ensuring that development projects are properly related to their sites, surrounding properties, traffic circulation, sewers, other infrastructure and environmental setting; and to control or mitigate the development of projects which are likely to have a significant adverse effect on the environment as

that document must be reviewed and considered by the same person or group of persons who make the decision to approve or disapprove the project at issue"); *California Clean Energy Committee v. City of San Jose* (2013) 220 Cal.App.4th 1325, 1341 (project approval "skirt[red] the purpose of CEQA by segregating environmental review of the EIR from the project approval").

¹³ LAMC Section 16.05(E)(2) (In granting site plan approval, the Director may condition and/or modify the project, or select an alternative project, as he or she deems necessary to implement the general or specific plan and to mitigate significant adverse effects of the development project on the environment and surrounding areas); LAMC Section 16.05(E)(4) ("The Director shall not approve or conditionally approve a site plan review for a development project unless an appropriate environmental review clearance has been prepared in accordance with the requirements of CEQA"); 16.05(F)(2) ("In granting an approval, the Director, or the Area Planning Commission on appeal, shall find: ...that the project is in substantial conformance with the purposes, intent and provisions of the General Plan, applicable community plan, and any applicable specific plan");

identified in the City’s environmental review process, or on surrounding properties by reason of inadequate site planning or improvements.¹⁴

Regarding the Density Bonus, LAMC Section 12.22 A.25(g)(2)(i)(c) provides that the Director “shall approve a Density Bonus” unless the Director finds that “[t]he Incentive will have a Specific Adverse Impact upon public health and safety or the physical environment.” Thus, the Hearing Officer is required to assess the Project’s environmental impacts de novo. The Hearing Officer cannot use its independent judgment to evaluate and mitigate the Project’s environmental impacts if the Hearing Officer merely defers to a previous decisionmaker’s approval of the SCEA.

The City Council’s premature approval of the SCEA violates a related CEQA principle: that agencies refrain from certifying and adopting an EIR prior to full consideration of all aspects of a project.¹⁵ In order to certify an EIR, CEQA requires that the lead agency determine whether the EIR fully and accurately describes a specific development project that is “proposed to be carried out or approved by [the agency],”¹⁶ then make a mandatory finding that the EIR has been “completed in compliance with CEQA.”¹⁷ The City Council lacked the legal capacity to make those determinations in November 2022 because the Project’s future, scope, and the extent of its entitlements and its environmental impacts remained uncertain at the time the City Council conducted its hearing on the Project.

In addition to the City Council’s improper separate approval of the SCEA from the underlying entitlements, the City Council’s approval of the SCEA also violated CEQA because the City Council did not hold a public hearing on the SCEA. Although the PLUM Committee held a hearing on its recommendation to the City Council, the City Council itself did not hold a public hearing, instead approving the SCEA on its consent calendar. CEQA provides that “[t]he legislative body of the lead agency shall conduct the public hearing or a planning commission may conduct the public hearing.”¹⁸ Here, the PLUM Committee is not the legislative body of the City of Los Angeles – the full City Council is. Therefore, the SCEA’s approval was not conducted in the manner required by law.¹⁹

¹⁴ LAMC Section 16.05(A)

¹⁵ See, e.g., *County of Amador v. El Dorado County Water Agency* (1999) 76 Cal.App.4th 931, 963; *Coalition for an Equitable Westlake/Macarthur Park v. City of Los Angeles* (2020) 47 Cal.App.5th 368, 379; *Stockton Citizens for Sensible Planning v. City of Stockton*, 48 Cal. 4th 481, 489; *Coalition for Clean Air v. City of Visalia* (2012) 209 Cal.App.4th 408, 418-25.

¹⁶ PRC § 21080(a).

¹⁷ 14 CCR § 15090(a)(1).

¹⁸ Pub. Res. Code Section 21155.2(b)(6).

¹⁹ *Id.*

If the Hearing Officer finds that the Project is not subject to further CEQA review under CEQA's subsequent review standards, this finding would be invalid as a matter of law because CEQA's subsequent review standards do not apply to initial approval of a Project. CEQA's subsequent review standards apply to subsequent modifications to projects which were previously approved and for which an EIR was previously certified or an MND/Negative Declaration previously adopted.²⁰ These legal standards do not apply to projects which have not yet received their initial entitlement approvals, as is the case here. Here, although the City Council has approved the Project's SCEA on November 22, 2022, the Hearing Officer will consider the Project's entitlements for the first time on January 24, 2023. The Project is therefore still undergoing its initial approval process. The City Council's approval of the SCEA was therefore premature and in violation of CEQA, and does not trigger CEQA's subsequent review standards for the Project's entitlements.

Pursuant to the Hearing Officer's duty to proceed in the manner required by law, and to not approve the Project's entitlements unless "an appropriate environmental review clearance has been prepared in accordance with the requirements of CEQA,"²¹ the Hearing Officer should vacate the City Council's certification of the SCEA and continue the hearing to a future date to allow for adequate consideration of the Project's environmental impacts.

IV. THE HEARING OFFICER LACKS SUBSTANTIAL EVIDENCE TO APPROVE THE PROJECT'S ENTITLEMENTS

To approve the Project's Site Plan Review and Density Bonus, the Hearing Officer must find (in part) that the Project would not have significant environmental impacts.²² Additionally, to approve the Site Plan Review, the Hearing Officer must find "that the project is in substantial conformance with the purposes, intent and provisions of the General Plan, applicable community plan,

²⁰ Pub. Res. Code, § 21166; CEQA Guidelines Sections 15162-15164.

²¹ LAMC Section 16.05(E)(4).

²² LAMC Section 16.05(E)(2) (In granting site plan approval, the Director may condition and/or modify the project, or select an alternative project, as he or she deems necessary to implement the general or specific plan and to mitigate significant adverse effects of the development project on the environment and surrounding areas); LAMC Section 16.05(E)(4) ("The Director shall not approve or conditionally approve a site plan review for a development project unless an appropriate environmental review clearance has been prepared in accordance with the requirements of CEQA"); 16.05(F)(2) ("In granting an approval, the Director, or the Area Planning Commission on appeal, shall find: ...that the project is in substantial conformance with the purposes, intent and provisions of the General Plan, applicable community plan, and any applicable specific plan"); LAMC Section 12.22 A.25(g)(2)(i)(c) (the Director "shall approve a Density Bonus" unless the Director finds that "[t]he Incentive will have a Specific Adverse Impact upon public health and safety or the physical environment.")

and any applicable specific plan.”²³ But as is shown herein and in our prior comments, the Project would have significant environmental and public health impacts, and is inconsistent with General Plan policies. Thus, the Hearing Officer lacks substantial evidence to make the findings necessary to approve the Project’s entitlements.

Our prior comments provide substantial evidence demonstrating that the Project will cause significant health risk impacts due to exposure from diesel particulate matter (“DPM”) during construction. Air quality and health risk expert Dr. James Clark corrected flaws in the City’s health risk analysis, and found that the Project’s construction impacts exceed the applicable 10 in 1 million significance threshold.²⁴ Specifically, the City’s health risk analysis failed to account for Age Sensitivity Factors (ASFs) when analyzing the risk to sensitive receptors. ASFs are meant to address the early-in-life susceptibility to carcinogens. The Applicant’s responses to comments argues against use of ASFs, but Dr. Clark’s attached comments provide further evidence supporting the use of ASFs.²⁵ Dr. Clark’s remodeled analysis shows that when analyzing the exposure for the receptor at the most sensitive age (children less than 2 years of age), the resulting risk to the receptor is 88 in 1,000,000 for the nearly three-year construction phase exposure.²⁶ The City has failed to update the Project’s analysis and mitigation to reflect a conservative analysis of the Project’s health risk impact. Thus, the Hearing Officer cannot approve the Project until this significant impact is mitigated. The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (“2020-2045 RTP/SCS”), which the SCEA tiers from, describes applicable mitigation measures in PMM AQ-1, such as requiring the Project to use Tier 4 Final equipment or better.²⁷

The Project’s failure to mitigate its emissions of DPM is inconsistent with Policy 1.3.1 of the City of Los Angeles’ General Plan Air Quality Element, which provides: “[m]inimize particulate emissions from construction sites.”²⁸ Policy 5.3.1 of the Air Quality Element provides: “Support the development and use of equipment powered by electric or low-emitting fuels.”²⁹ Here, the Project does not only fail to minimize particulate emissions, it fails to reduce a significant impact to a less-than-significant level. The Project is thus inconsistent with these Policies.

²³ LAMC Section 16.05(F)

²⁴ Clark SCEA Comments, pg. 7-8.

²⁵ Clark Comments, pg. 2-3.

²⁶ Clark SCEA Comments, pg. 8.

²⁷ SCEA, pg. 4-10.

²⁸ SCEA, pg. 5-20.

²⁹ SCEA, pg. 5-21.

The Project also generates potentially significant health risks from disturbance and transport of toxic materials. The SCEA acknowledges that the Project has a risk of disturbing soil contaminants, including lead, chromium, and TPH.³⁰ Our comments explained that the City failed to disclose the health risk impacts of exposure to these contaminants, as required by CEQA.³¹ The City has still failed to provide this information. The Hearing Officer cannot approve the Project until the Project's health impacts are fully disclosed.

Our initial comments also demonstrate that the Project failed to conduct a sufficient investigation into energy conservation measures that might be available or appropriate for the Project, as is required in the CEQA Guidelines.³² Notably, the Project failed to analyze the feasibility of measures reducing operational natural gas use, despite expecting to use 11,891 Thousand British Thermal Units per year (kBtu) of natural gas. These include building electrification measures, such as replacing gas stoves with electric stoves. The City has not yet addressed the feasibility of reducing the Project's natural gas consumption by electrifying the building.

Substantial evidence demonstrates that residential natural gas use contributes significantly to climate change, and has health risks on residents.³³ In a 1992 meta-analysis of studies on this topic, scientists at the EPA and Duke University found that nitrogen dioxide exposure that is comparable to that from a gas stove increases the odds of children developing a respiratory illness by about 20 percent.³⁴ Since then, numerous other studies have documented the effects of gas stove exposure on respiratory health. A 2013 meta-analysis of 41 studies found that gas cooking increases the risk of asthma in children and that NO₂ exposure is linked with currently having a wheeze.³⁵ Most recently, a study published last December found that 12.7 percent of childhood asthma cases in the U.S. can be

³⁰ SCEA, pg. 5-114.

³¹ *Bakersfield Citizens for Local Control v. City of Bakersfield* ("Bakersfield") (2004) 124 Cal.App.4th 1184.

³² 14 Cal. Code Regs., § 15126.4(a)(1)(C) (stating "Energy conservation measures, as well as other appropriate mitigation measures, shall be discussed when relevant.").

³³ <https://www.washingtonpost.com/politics/2023/01/06/gas-stove-pollution-causes-127-childhood-asthma-study-finds/>; <https://www.scientificamerican.com/article/the-health-risks-of-gas-stoves-explained/>;

³⁴ Hasselblad et al., Synthesis of Environmental Evidence: Nitrogen Dioxide Epidemiology Studies; *Journal of the Air & Waste Management Association* Volume 42, 1992 - Issue 5, available at <https://www.tandfonline.com/doi/abs/10.1080/10473289.1992.10467018>.

³⁵ Lin et al., Meta-analysis of the effects of indoor nitrogen dioxide and gas cooking on asthma and wheeze in children, *International Journal of Epidemiology*, Volume 42, Issue 6, December 2013, Pages 1724–1737 <https://academic.oup.com/ije/article/42/6/1724/737113?login=false>.

attributed to gas stove use.³⁶ The Hearing Officer cannot approve the Project unless this significant impact is mitigated.

Our prior comments identified potentially significant noise impacts on neighboring residences. To begin with, the City failed to properly establish the baseline noise level by only measuring noise at two locations. Accurate characterization of baseline noise levels is essential for evaluating the Project's noise impacts. Noise expert Ani Toncheva explains that in contrast to the contentions in the Applicant's responses to comments, the baseline noise levels are still not properly established.³⁷

The City also failed to analyze potentially significant construction noise impacts on the upper floors of neighboring residences. As explained in our prior comments, the Project site is surrounded by sensitive receptors in multi-story residences. But the SCEA does not consider noise levels during the erecting of upper stories of the Project and does not provide evidence that the mitigation measures provided for the at grade construction phases would be effective for this work.³⁸ In light of the absence of this analysis in the SCEA, our consultant, Ms. Jennifer Levins, provided analysis showing there would be a potentially significant impact that would require mitigation. Specifically, Ms. Levins calculated the noise level from the tower construction to the residences on S. Alfred Street.³⁹ An Leq noise level of 79 dBA was calculated at the S. Alfred Street residences. This exceeds the 75 dBA significance threshold in the LAMC.

Our prior comments also explains that the City's analysis of the Project's operational noise impacts does not fully account for all sources of noise. Regarding mechanical noise, the SCEA noise analysis states "it is unlikely that the Project's HVAC systems would be capable of increasing off-site noise levels by a discernable degree."⁴⁰ But Ms. Levin's comments explain that the potential noise impact of mechanical equipment used by the Project may be significant. And Ms. Toncheva notes that the Applicant's responses to comments do not provide alternative information in the form of new reference level data or factual data as evidence.⁴¹ Regarding noise from the pool deck/terrace, Ms. Levins' comments provide hypothetical predictions for several scenarios of activity on the pool

³⁶ Gruenwald et al., Population Attributable Fraction of Gas Stoves and Childhood Asthma in the United States, *Int. J. Environ. Res. Public Health* 2023, 20(1), 75, available at <https://www.mdpi.com/1660-4601/20/1/75>.

³⁷ Toncheva Comments, pg. 1-2.

³⁸ Toncheva Comments, pg. 2.

³⁹ Levins Comments, pg. 2.

⁴⁰ Levins Comments, pg. 2.

⁴¹ Toncheva Comments, pg. 3.

deck/terrace level, with varying size and speech volume levels.⁴² Her calculations show that noise generated by this use could exceed 5 dBA above the existing ambient levels.⁴³ The Applicant's responses state that her conclusions are based on an incorrect distance from the nearest sensitive receptor (30 feet), but Ms. Toncheva's analysis confirms that the slant distance from a speaker at the terrace edge to the 3rd story of the S. Alfred Street residences is in fact 30 feet.

In sum, the Project would have significant environmental and public health impacts, and is inconsistent with General Plan policies. The Applicant's responses to comments fail to resolve the Project's issues. The Hearing Officer thus lacks substantial evidence to make the findings necessary to approve the Project's Site Plan Review and Density Bonus.

V. CONCLUSION

Due to the City Council's premature and unsupported approval of the SCEA, the Hearing Officer cannot rely on the SCEA to approve the Project's Site Plan Review and Density Bonus. And due to the Project's significant environmental impacts regarding health risk, noise, energy, and hazards, the Hearing Officer lacks substantial evidence to make the findings necessary to approve the Project's entitlements, which require the Project's environmental and public health impacts to be mitigated to a less-than-significant level.

CREED LA respectfully requests that the Hearing Officer vacate the City Council's certification of the SCEA, remand the Project to staff to complete its analysis and mitigation of the Project's significant impacts so that the Project's underlying entitlements may be approved, and continue the hearing to a future date until these issues have been addressed.

Sincerely,



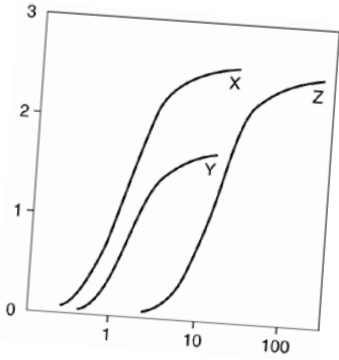
Aidan P. Marshall

Attachments
APM:acp

⁴² Levins Comments, pg. 3; Toncheva Comments, pg. 3-4.

⁴³ Levins Comments, pg. 3.

EXHIBIT A



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January 24, 2023

Adams Broadwell Joseph & Cardozo
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Attn: Mr. Aidan Marshall

Subject: Response To Rand Paster Nelson Comments On Sustainable Communities Environmental Assessment (SCEA) For The 1050 La Cienega Boulevard Project, Los Angeles, CA 90035 Case Number: ENV-2022-2280-SCEA

Dear Mr. Marshall:

At the request of Adams Broadwell Joseph & Cardozo (ABJC), Clark and Associates (Clark) has reviewed materials related to the 2022 Rand Paster Nelson’s comments on the Sustainable Communities Environmental Assessment (SCEA) of the above referenced project.

Clark’s review of the materials in no way constitutes a validation of the conclusions or materials contained within the plan. If we do not comment on a specific item this does not constitute acceptance of the item.

Project Description:

According to the City, The Project would construct a mixed-use development with 290 residential units (36 studio units, 158 1-bedroom units, and 96 2-bedroom units) and 7,500 square feet of restaurant commercial use in a 28-story, 297,690-square-foot building. The Project would include a total of 426 vehicle parking spaces, 184 bicycle parking spaces (164 long term and 20 short term), and 54,540 square feet of open space, as well as an approximately 4,500 square-foot publicly accessible pocket park located at the northern portion of the Project Site.

Rand Paster Nelson And Their Consultant, Air Quality Dynamics, Have Failed To Address My Concern That The Appropriate Age Sensitivity Factor (ASF) For DPM Was Not Utilized In The Health Risk Analysis (HRA) Presented In The SCEA

Rather than addressing the well documented ASFs for mutagenic chemicals, like DPM, that USEPA and the California Air Resources Board (CARB) have advocated in guidances^{1,2,3,4}, Air Quality Dynamics (AQD), attempts to discount the use of the ASFs by conflating age adjusted intake variables with age sensitivity factors. Age sensitivity factors are meant to address the early-in-life susceptibility to carcinogens.

The State of California via the California Air Resources Board (CARB) and the Office of Environmental Health Hazard Assessment (OEHHA) have explicitly stated that “Diesel exhaust contains genotoxic compounds in both the vapor phase and the particle phase. Diesel exhaust particles or extracts of diesel exhaust particles are *mutagenic* (emphasis added) in bacteria and in *mammalian cell systems*, and *can induce chromosomal aberrations, aneuploidy, and sister chromatid exchange in rodents and in human cells in vitro*. Diesel exhaust particles induced unscheduled DNA synthesis in vitro in mammalian cells”

In the SCAQMD’s recent MATES V (Multiple Air Toxics Exposure Study in the South Coast AQMD) study in the risk characterization section of the study AQMD noted that the method utilized combined exposure factor that accounted for the exposure factor for each assigned age bin. Each

¹ U.S. EPA. 2006. Memorandum – Implementation of the Cancer Guidelines and Accompanying Supplemental Guidance – Science Policy Council Cancer Guidelines Implementation Workgroup Communication II: Performing Risk Assessments That Include Carcinogens Described in the Supplemental Guidance as having a Mutagenic Mode of Action.

² City of Los Angeles, Department of City Planning. 2019. Air Quality And Health Effects. Pg 10

³ USEPA. 2011. Age Dependent Adjustment Factor (ADAF) Application. Dated March 2011
https://hero.epa.gov/hero/index.cfm/reference/details/reference_id/783747

⁴ OEHHA. 2009. In Utero and Early Life Susceptibility to Carcinogens. The Derivation of Age-at-Exposure Sensitivity Measures. California Environmental Protection Agency Office of Environmental Health Hazard Assessment. May 2009. <https://oehha.ca.gov/media/downloads/crn/appendixyearly.pdf>

assigned age bin was made up of the daily breathing rate, exposure duration of the age bin, fraction of time at home, and *an age sensitivity factor*.⁵ SCAQMD is stating that they included the use of the ASFs that were previously identified for DPM.

Therefore to be consistent with the State's designation of DPM as a mutagenic chemical and SCAQMD's quantification of health risks in the Air Basin, the City must evaluate the health risk from exposure to DPM in a manner consistent with the guidance from the State. To that end, ASFs of 10 for exposures prior to age 2, ASFs of 3 for exposure from age 2 to 16 , and an ASF of 1 for exposures to DPM for adults should have been performed. The City must re-evaluate the risk using the ASFs in the calculation of the risks to the residents nearby.

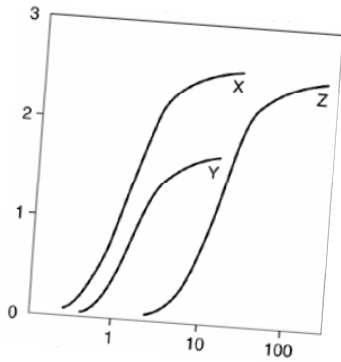
Conclusion

The facts identified and referenced in this comment letter lead me to reasonably conclude that the Project could result in significant unmitigated impacts if the SCE is approved. The City must re-evaluate the significant impacts identified in this letter by requiring the preparation of an EIR.

Sincerely,

A handwritten signature in black ink, appearing to read "F. J. Corbett". The signature is written in a cursive style with a large initial "F" and "C".

⁵ SCAQMD. 2022. MATES V Study. <http://www.aqmd.gov/docs/default-source/planning/mates-v/mates-v-final-report-9-24-21.pdf?sfvrsn=6>



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James J. J. Clark, Ph.D.

Principal Toxicologist

Toxicology/Exposure Assessment Modeling

Risk Assessment/Analysis/Dispersion Modeling

Education:

Ph.D., Environmental Health Science, University of California, 1995

M.S., Environmental Health Science, University of California, 1993

B.S., Biophysical and Biochemical Sciences, University of Houston, 1987

Professional Experience:

Dr. Clark is a well recognized toxicologist, air modeler, and health scientist. He has 20 years of experience in researching the effects of environmental contaminants on human health including environmental fate and transport modeling (SCREEN3, AEROMOD, ISCST3, Johnson-Ettinger Vapor Intrusion Modeling); exposure assessment modeling (partitioning of contaminants in the environment as well as PBPK modeling); conducting and managing human health risk assessments for regulatory compliance and risk-based clean-up levels; and toxicological and medical literature research.

Significant projects performed by Dr. Clark include the following:

LITIGATION SUPPORT

Case: James Harold Caygle, et al, v. Drummond Company, Inc. Circuit Court for the Tenth Judicial Circuit, Jefferson County, Alabama. Civil Action. CV-2009

Client: Environmental Litigation Group, Birmingham, Alabama

Dr. Clark performed an air quality assessment of emissions from a coke factory located in Tarrant, Alabama. The assessment reviewed include a comprehensive review of air quality standards, measured concentrations of pollutants from factory, an inspection of the facility and detailed assessment of the impacts on the community. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: Rose Roper V. Nissan North America, et al. Superior Court of the State Of California for the County Of Los Angeles – Central Civil West. Civil Action. NC041739

Client: Rose, Klein, Marias, LLP, Long Beach, California

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to multiple chemicals, including benzene, who later developed a respiratory distress. A review of the individual's medical and occupational history was performed to prepare an exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to respiratory irritants. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: O'Neil V. Sherwin Williams, et al. United States District Court Central District of California

Client: Rose, Klein, Marias, LLP, Long Beach, California

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to petroleum distillates who later developed a bladder cancer. A review of the individual's medical and occupational history was performed to prepare a quantitative exposure assessment. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Summary judgment for defendants.

Case: Moore V., Shell Oil Company, et al. Superior Court of the State Of California for the County Of Los Angeles

Client: Rose, Klein, Marias, LLP, Long Beach, California

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to chemicals while benzene who later developed a leukogenic disease. A review of the individual's medical and occupational history was performed to prepare a quantitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to refined petroleum hydrocarbons. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: Raymond Saltonstall V. Fuller O'Brien, KILZ, and Zinsser, et al. United States District Court Central District of California

Client: Rose, Klein, Marias, LLP, Long Beach, California

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to benzene who later developed a leukogenic disease. A review of the individual's medical and occupational history was performed to prepare a quantitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to refined petroleum hydrocarbons. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: Richard Boyer and Elizabeth Boyer, husband and wife, V. DESCO Corporation, et al. Circuit Court of Brooke County, West Virginia. Civil Action Number 04-C-7G.

Client: Frankovitch, Anetakis, Colantonio & Simon, Morgantown, West Virginia.

Dr. Clark performed a toxicological assessment of a family exposed to chlorinated solvents released from the defendant's facility into local drinking water supplies. A review of the individual's medical and occupational history was performed to prepare a qualitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to chlorinated solvents. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: JoAnne R. Cook, V. DESCO Corporation, et al. Circuit Court of Brooke County, West Virginia. Civil Action Number 04-C-9R

Client: Frankovitch, Anetakis, Colantonio & Simon, Morgantown, West Virginia.

Dr. Clark performed a toxicological assessment of an individual exposed to chlorinated solvents released from the defendant's facility into local drinking water supplies. A review of the individual's medical and occupational history was performed to prepare a qualitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to chlorinated solvents. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: Patrick Allen And Susan Allen, husband and wife, and Andrew Allen, a minor, V. DESCO Corporation, et al. Circuit Court of Brooke County, West Virginia. Civil Action Number 04-C-W

Client: Frankovitch, Anetakis, Colantonio & Simon, Morgantown, West Virginia.

Dr. Clark performed a toxicological assessment of a family exposed to chlorinated solvents released from the defendant's facility into local drinking water supplies. A review of the individual's medical and occupational history was performed to prepare a qualitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to chlorinated solvents. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: Michael Fahey, Susan Fahey V. Atlantic Richfield Company, et al. United States District Court Central District of California Civil Action Number CV-06 7109 JCL.

Client: Rose, Klein, Marias, LLP, Long Beach, California

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to refined petroleum hydrocarbons who later developed a leukogenic disease. A review of the individual's medical and occupational history was performed to prepare a qualitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to refined petroleum hydrocarbons. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: Constance Acevedo, et al., V. California Spray-Chemical Company, et al., Superior Court of the State Of California, County Of Santa Cruz. Case No. CV 146344

Dr. Clark performed a comprehensive exposure assessment of community members exposed to toxic metals from a former lead arsenate manufacturing facility. The former manufacturing site had undergone a DTSC mandated removal action/remediation for the presence of the toxic metals at the site. Opinions were presented regarding the elevated levels of arsenic and lead (in attic dust and soils) found throughout the community and the potential for harm to the plaintiffs in question.

Case Result: Settlement in favor of defendant.

Case: Michael Nawrocki V. The Coastal Corporation, Kurk Fuel Company, Pautler Oil Service, State of New York Supreme Court, County of Erie, Index Number I2001-11247

Client: Richard G. Berger Attorney At Law, Buffalo, New York

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to refined petroleum hydrocarbons who later developed a leukogenic disease. A review of the individual's medical and occupational history was performed to prepare a qualitative exposure assessment. The exposure assessment was evaluated against the

known outcomes in published literature to exposure to refined petroleum hydrocarbons. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Judgement in favor of defendant.

SELECTED AIR MODELING RESEARCH/PROJECTS

Client – Confidential

Dr. Clark performed a comprehensive evaluation of criteria pollutants, air toxins, and particulate matter emissions from a carbon black production facility to determine the impacts on the surrounding communities. The results of the dispersion model will be used to estimate acute and chronic exposure concentrations to multiple contaminants and will be incorporated into a comprehensive risk evaluation.

Client – Confidential

Dr. Clark performed a comprehensive evaluation of air toxins and particulate matter emissions from a railroad tie manufacturing facility to determine the impacts on the surrounding communities. The results of the dispersion model have been used to estimate acute and chronic exposure concentrations to multiple contaminants and have been incorporated into a comprehensive risk evaluation.

Client – Los Angeles Alliance for a New Economy (LAANE), Los Angeles, California

Dr. Clark is advising the LAANE on air quality issues related to current flight operations at the Los Angeles International Airport (LAX) operated by the Los Angeles World Airport (LAWA) Authority. He is working with the LAANE and LAX staff to develop a comprehensive strategy for meeting local community concerns over emissions from flight operations and to engage federal agencies on the issue of local impacts of community airports.

Client – City of Santa Monica, Santa Monica, California

Dr. Clark is advising the City of Santa Monica on air quality issues related to current flight operations at the facility. He is working with the City staff to develop a comprehensive strategy for meeting local community concerns over emissions from flight operations and to engage federal agencies on the issue of local impacts of community airports.

Client: Omnitrans, San Bernardino, California

Dr. Clark managed a public health survey of three communities near transit fueling facilities in San Bernardino and Montclair California in compliance with California Senate Bill 1927. The survey included an epidemiological survey of the effected communities, emission surveys of local businesses, dispersion modeling to determine potential emission concentrations within the communities, and a comprehensive risk assessment of each community. The results of the study were presented to the Governor as mandated by Senate Bill 1927.

Client: Confidential, San Francisco, California

Summarized cancer types associated with exposure to metals and smoking. Researched the specific types of cancers associated with exposure to metals and smoking. Provided causation analysis of the association between cancer types and exposure for use by non-public health professionals.

Client: Confidential, Minneapolis, Minnesota

Prepared human health risk assessment of workers exposed to VOCs from neighboring petroleum storage/transport facility. Reviewed the systems in place for distribution of petroleum hydrocarbons to identify chemicals of concern (COCs), prepared comprehensive toxicological summaries of COCs, and quantified potential risks from carcinogens and non-carcinogens to receptors at or adjacent to site. This evaluation was used in the support of litigation.

Client – United Kingdom Environmental Agency

Dr. Clark is part of team that performed comprehensive evaluation of soil vapor intrusion of VOCs from former landfill adjacent residences for the United Kingdom's Environment

Agency. The evaluation included collection of liquid and soil vapor samples at site, modeling of vapor migration using the Johnson Ettinger Vapor Intrusion model, and calculation of site-specific health based vapor thresholds for chlorinated solvents, aromatic hydrocarbons, and semi-volatile organic compounds. The evaluation also included a detailed evaluation of the use, chemical characteristics, fate and transport, and toxicology of chemicals of concern (COC). The results of the evaluation have been used as a briefing tool for public health professionals.

EMERGING/PERSISTENT CONTAMINANT RESEARCH/PROJECTS

Client: Ameren Services, St. Louis, Missouri

Managed the preparation of a comprehensive human health risk assessment of workers and residents at or near an NPL site in Missouri. The former operations at the Property included the servicing and repair of electrical transformers, which resulted in soils and groundwater beneath the Property and adjacent land becoming impacted with PCB and chlorinated solvent compounds. The results were submitted to U.S. EPA for evaluation and will be used in the final ROD.

Client: City of Santa Clarita, Santa Clarita, California

Dr. Clark is managing the oversight of the characterization, remediation and development activities of a former 1,000 acre munitions manufacturing facility for the City of Santa Clarita. The site is impacted with a number of contaminants including perchlorate, unexploded ordinance, and volatile organic compounds (VOCs). The site is currently under a number of regulatory consent orders, including an Imminent and Substantial Endangerment Order. Dr. Clark is assisting the impacted municipality with the development of remediation strategies, interaction with the responsible parties and stakeholders, as well as interfacing with the regulatory agency responsible for oversight of the site cleanup.

Client: Confidential, Los Angeles, California

Prepared comprehensive evaluation of perchlorate in environment. Dr. Clark evaluated the production, use, chemical characteristics, fate and transport, toxicology, and remediation of perchlorate. Perchlorates form the basis of solid rocket fuels and have recently been detected in water supplies in the United States. The results of this research

were presented to the USEPA, National GroundWater, and ultimately published in a recent book entitled *Perchlorate in the Environment*.

Client – Confidential, Los Angeles, California

Dr. Clark is performing a comprehensive review of the potential for pharmaceuticals and their by-products to impact groundwater and surface water supplies. This evaluation will include a review if available data on the history of pharmaceutical production in the United States; the chemical characteristics of various pharmaceuticals; environmental fate and transport; uptake by xenobiotics; the potential effects of pharmaceuticals on water treatment systems; and the potential threat to public health. The results of the evaluation may be used as a briefing tool for non-public health professionals.

PUBLIC HEALTH/TOXICOLOGY

Client: Brayton Purcell, Novato, California

Dr. Clark performed a toxicological assessment of residents exposed to methyl-tertiary butyl ether (MTBE) from leaking underground storage tanks (LUSTs) adjacent to the subject property. The symptomology of residents and guests of the subject property were evaluated against the known outcomes in published literature to exposure to MTBE. The study found that residents had been exposed to MTBE in their drinking water; that concentrations of MTBE detected at the site were above regulatory guidelines; and, that the symptoms and outcomes expressed by residents and guests were consistent with symptoms and outcomes documented in published literature.

Client: Confidential, San Francisco, California

Identified and analyzed fifty years of epidemiological literature on workplace exposures to heavy metals. This research resulted in a summary of the types of cancer and non-cancer diseases associated with occupational exposure to chromium as well as the mortality and morbidity rates.

Client: Confidential, San Francisco, California

Summarized major public health research in United States. Identified major public health research efforts within United States over last twenty years. Results were used as a briefing tool for non-public health professionals.

Client: Confidential, San Francisco, California

Quantified the potential multi-pathway dose received by humans from a pesticide applied indoors. Part of team that developed exposure model and evaluated exposure concentrations in a comprehensive report on the plausible range of doses received by a specific person. This evaluation was used in the support of litigation.

Client: Covanta Energy, Westwood, California

Evaluated health risk from metals in biosolids applied as soil amendment on agricultural lands. The biosolids were created at a forest waste cogeneration facility using 96% whole tree wood chips and 4 percent green waste. Mass loading calculations were used to estimate Cr(VI) concentrations in agricultural soils based on a maximum loading rate of 40 tons of biomass per acre of agricultural soil. The results of the study were used by the Regulatory agency to determine that the application of biosolids did not constitute a health risk to workers applying the biosolids or to residences near the agricultural lands.

Client – United Kingdom Environmental Agency

Oversaw a comprehensive toxicological evaluation of methyl-*tertiary* butyl ether (MtBE) for the United Kingdom's Environment Agency. The evaluation included available data on the production, use, chemical characteristics, fate and transport, toxicology, and remediation of MtBE. The results of the evaluation have been used as a briefing tool for public health professionals.

Client – Confidential, Los Angeles, California

Prepared comprehensive evaluation of *tertiary* butyl alcohol (TBA) in municipal drinking water system. TBA is the primary breakdown product of MtBE, and is suspected to be the primary cause of MtBE toxicity. This evaluation will include available information on the production, use, chemical characteristics, fate and transport in the environment, absorption, distribution, routes of detoxification, metabolites, carcinogenic potential, and remediation of TBA. The results of the evaluation were used as a briefing tool for non-public health professionals.

Client – Confidential, Los Angeles, California

Prepared comprehensive evaluation of methyl *tertiary* butyl ether (MTBE) in municipal drinking water system. MTBE is a chemical added to gasoline to increase the octane

rating and to meet Federally mandated emission criteria. The evaluation included available data on the production, use, chemical characteristics, fate and transport, toxicology, and remediation of MTBE. The results of the evaluation have been used as a briefing tool for non-public health professionals.

Client – Ministry of Environment, Lands & Parks, British Columbia

Dr. Clark assisted in the development of water quality guidelines for methyl tertiary-butyl ether (MTBE) to protect water uses in British Columbia (BC). The water uses to be considered includes freshwater and marine life, wildlife, industrial, and agricultural (e.g., irrigation and livestock watering) water uses. Guidelines from other jurisdictions for the protection of drinking water, recreation and aesthetics were to be identified.

Client: Confidential, Los Angeles, California

Prepared physiologically based pharmacokinetic (PBPK) assessment of lead risk of receptors at middle school built over former industrial facility. This evaluation is being used to determine cleanup goals and will be basis for regulatory closure of site.

Client: Kaiser Venture Incorporated, Fontana, California

Prepared PBPK assessment of lead risk of receptors at a 1,100-acre former steel mill. This evaluation was used as the basis for granting closure of the site by lead regulatory agency.

RISK ASSESSMENTS/REMEDIAL INVESTIGATIONS

Client: Confidential, Atlanta, Georgia

Researched potential exposure and health risks to community members potentially exposed to creosote, polycyclic aromatic hydrocarbons, pentachlorophenol, and dioxin compounds used at a former wood treatment facility. Prepared a comprehensive toxicological summary of the chemicals of concern, including the chemical characteristics, absorption, distribution, and carcinogenic potential. Prepared risk characterization of the carcinogenic and non-carcinogenic chemicals based on the exposure assessment to quantify the potential risk to members of the surrounding community. This evaluation was used to help settle class-action tort.

Client: Confidential, Escondido, California

Prepared comprehensive Preliminary Endangerment Assessment (PEA) of dense non-aqueous liquid phase hydrocarbon (chlorinated solvents) contamination at a former printed circuit board manufacturing facility. This evaluation was used for litigation support and may be used as the basis for reaching closure of the site with the lead regulatory agency.

Client: Confidential, San Francisco, California

Summarized epidemiological evidence for connective tissue and autoimmune diseases for product liability litigation. Identified epidemiological research efforts on the health effects of medical prostheses. This research was used in a meta-analysis of the health effects and as a briefing tool for non-public health professionals.

Client: Confidential, Bogotá, Columbia

Prepared comprehensive evaluation of the potential health risks associated with the redevelopment of a 13.7 hectares plastic manufacturing facility in Bogotá, Colombia. The risk assessment was used as the basis for the remedial goals and closure of the site.

Client: Confidential, Los Angeles, California

Prepared comprehensive human health risk assessment of students, staff, and residents potentially exposed to heavy metals (principally cadmium) and VOCs from soil and soil vapor at 12-acre former crude oilfield and municipal landfill. The site is currently used as a middle school housing approximately 3,000 children. The evaluation determined that the site was safe for the current and future uses and was used as the basis for regulatory closure of site.

Client: Confidential, Los Angeles, California

Managed remedial investigation (RI) of heavy metals and volatile organic chemicals (VOCs) for a 15-acre former manufacturing facility. The RI investigation of the site included over 800 different sampling locations and the collection of soil, soil gas, and groundwater samples. The site is currently used as a year round school housing approximately 3,000 children. The Remedial Investigation was performed in a manner

that did not interrupt school activities and met the time restrictions placed on the project by the overseeing regulatory agency. The RI Report identified the off-site source of metals that impacted groundwater beneath the site and the sources of VOCs in soil gas and groundwater. The RI included a numerical model of vapor intrusion into the buildings at the site from the vadose zone to determine exposure concentrations and an air dispersion model of VOCs from the proposed soil vapor treatment system. The Feasibility Study for the Site is currently being drafted and may be used as the basis for granting closure of the site by DTSC.

Client: Confidential, Los Angeles, California

Prepared comprehensive human health risk assessment of students, staff, and residents potentially exposed to heavy metals (principally lead), VOCs, SVOCs, and PCBs from soil, soil vapor, and groundwater at 15-acre former manufacturing facility. The site is currently used as a year round school housing approximately 3,000 children. The evaluation determined that the site was safe for the current and future uses and will be basis for regulatory closure of site.

Client: Confidential, Los Angeles, California

Prepared comprehensive evaluation of VOC vapor intrusion into classrooms of middle school that was former 15-acre industrial facility. Using the Johnson-Ettinger Vapor Intrusion model, the evaluation determined acceptable soil gas concentrations at the site that did not pose health threat to students, staff, and residents. This evaluation is being used to determine cleanup goals and will be basis for regulatory closure of site.

Client –Dominguez Energy, Carson, California

Prepared comprehensive evaluation of the potential health risks associated with the redevelopment of 6-acre portion of a 500-acre oil and natural gas production facility in Carson, California. The risk assessment was used as the basis for closure of the site.

Kaiser Ventures Incorporated, Fontana, California

Prepared health risk assessment of semi-volatile organic chemicals and metals for a fifty-year old wastewater treatment facility used at a 1,100-acre former steel mill. This evaluation was used as the basis for granting closure of the site by lead regulatory agency.

ANR Freight - Los Angeles, California

Prepared a comprehensive Preliminary Endangerment Assessment (PEA) of petroleum hydrocarbon and metal contamination of a former freight depot. This evaluation was as the basis for reaching closure of the site with lead regulatory agency.

Kaiser Ventures Incorporated, Fontana, California

Prepared comprehensive health risk assessment of semi-volatile organic chemicals and metals for 23-acre parcel of a 1,100-acre former steel mill. The health risk assessment was used to determine clean up goals and as the basis for granting closure of the site by lead regulatory agency. Air dispersion modeling using ISCST3 was performed to determine downwind exposure point concentrations at sensitive receptors within a 1 kilometer radius of the site. The results of the health risk assessment were presented at a public meeting sponsored by the Department of Toxic Substances Control (DTSC) in the community potentially affected by the site.

Unocal Corporation - Los Angeles, California

Prepared comprehensive assessment of petroleum hydrocarbons and metals for a former petroleum service station located next to sensitive population center (elementary school). The assessment used a probabilistic approach to estimate risks to the community and was used as the basis for granting closure of the site by lead regulatory agency.

Client: Confidential, Los Angeles, California

Managed oversight of remedial investigation most contaminated heavy metal site in California. Lead concentrations in soil excess of 68,000,000 parts per billion (ppb) have been measured at the site. This State Superfund Site was a former hard chrome plating operation that operated for approximately 40-years.

Client: Confidential, San Francisco, California

Coordinator of regional monitoring program to determine background concentrations of metals in air. Acted as liaison with SCAQMD and CARB to perform co-location sampling and comparison of accepted regulatory method with ASTM methodology.

Client: Confidential, San Francisco, California

Analyzed historical air monitoring data for South Coast Air Basin in Southern California and potential health risks related to ambient concentrations of carcinogenic metals and volatile organic compounds. Identified and reviewed the available literature and calculated risks from toxins in South Coast Air Basin.

IT Corporation, North Carolina

Prepared comprehensive evaluation of potential exposure of workers to air-borne VOCs at hazardous waste storage facility under SUPERFUND cleanup decree. Assessment used in developing health based clean-up levels.

Professional Associations

American Public Health Association (APHA)

Association for Environmental Health and Sciences (AEHS)

American Chemical Society (ACS)

California Redevelopment Association (CRA)

International Society of Environmental Forensics (ISEF)

Society of Environmental Toxicology and Chemistry (SETAC)

Publications and Presentations:

Books and Book Chapters

Sullivan, P., **J.J. J. Clark**, F.J. Agardy, and P.E. Rosenfeld. (2007). *Synthetic Toxins In The Food, Water and Air of American Cities*. Elsevier, Inc. Burlington, MA.

Sullivan, P. and **J.J. J. Clark**. 2006. *Choosing Safer Foods, A Guide To Minimizing Synthetic Chemicals In Your Diet*. Elsevier, Inc. Burlington, MA.

Sullivan, P., Agardy, F.J., and **J.J.J. Clark**. 2005. *The Environmental Science of Drinking Water*. Elsevier, Inc. Burlington, MA.

Sullivan, P.J., Agardy, F.J., **Clark, J.J.J.** 2002. *America's Threatened Drinking Water: Hazards and Solutions*. Trafford Publishing, Victoria B.C.

Clark, J.J.J. 2001. "TBA: Chemical Properties, Production & Use, Fate and Transport, Toxicology, Detection in Groundwater, and Regulatory Standards" in *Oxygenates in the Environment*. Art Diaz, Ed.. Oxford University Press: New York.

Clark, J.J.J. 2000. "Toxicology of Perchlorate" in *Perchlorate in the Environment*. Edward Urbansky, Ed. Kluwer/Plenum: New York.

Clark, J.J.J. 1995. Probabilistic Forecasting of Volatile Organic Compound Concentrations At The Soil Surface From Contaminated Groundwater. UMI.

Baker, J.; **Clark, J.J.J.**; Stanford, J.T. 1994. Ex Situ Remediation of Diesel Contaminated Railroad Sand by Soil Washing. Principles and Practices for Diesel Contaminated Soils, Volume III. P.T. Kostecki, E.J. Calabrese, and C.P.L. Barkan, eds. Amherst Scientific Publishers, Amherst, MA. pp 89-96.

Journal and Proceeding Articles

- Tam L. K., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008) A Statistical Analysis Of Attic Dust And Blood Lipid Concentrations Of Tetrachloro-p-Dibenzodioxin (TCDD) Toxicity Equivalency Quotients (TEQ) In Two Populations Near Wood Treatment Facilities. Organohalogen Compounds, Volume 70 (2008) page 002254.
- Tam L. K., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008) Methods For Collect Samples For Assessing Dioxins And Other Environmental Contaminants In Attic Dust: A Review. Organohalogen Compounds, Volume 70 (2008) page 000527
- Hensley A.R., Scott, A., Rosenfeld P.E., **Clark, J.J.J.** (2007). "Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility." *Environmental Research*. 105:194-199.
- Rosenfeld, P.E., **Clark, J. J.**, Hensley, A.R., and Suffet, I.H. 2007. "The Use Of An Odor Wheel Classification For The Evaluation of Human Health Risk Criteria For Compost Facilities" *Water Science & Technology*. 55(5): 345-357.
- Hensley A.R., Scott, A., Rosenfeld P.E., **Clark, J.J.J.** 2006. "Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility." The 26th International Symposium on Halogenated Persistent Organic Pollutants – DIOXIN2006, August 21 – 25, 2006. Radisson SAS Scandinavia Hotel in Oslo Norway.
- Rosenfeld, P.E., **Clark, J. J.** and Suffet, I.H. 2005. "The Value Of An Odor Quality Classification Scheme For Compost Facility Evaluations" The U.S. Composting Council's 13th Annual Conference January 23 - 26, 2005, Crowne Plaza Riverwalk, San Antonio, TX.
- Rosenfeld, P.E., **Clark, J. J.** and Suffet, I.H. 2004. "The Value Of An Odor Quality Classification Scheme For Urban Odor" WEFTEC 2004. 77th Annual Technical Exhibition & Conference October 2 - 6, 2004, Ernest N. Morial Convention Center, New Orleans, Louisiana.
- Clark, J.J.J.** 2003. "Manufacturing, Use, Regulation, and Occurrence of a Known Endocrine Disrupting Chemical (EDC), 2,4-Dichlorophenoxyacetic Acid (2,4-D) in California Drinking Water Supplies." National Groundwater Association Southwest Focus Conference: Water Supply and Emerging Contaminants. Minneapolis, MN. March 20, 2003.

- Rosenfeld, P. and **J.J.J. Clark**. 2003. "Understanding Historical Use, Chemical Properties, Toxicity, and Regulatory Guidance" National Groundwater Association Southwest Focus Conference: Water Supply and Emerging Contaminants. Phoenix, AZ. February 21, 2003.
- Clark, J.J.J.**, Brown A. 1999. Perchlorate Contamination: Fate in the Environment and Treatment Options. In Situ and On-Site Bioremediation, Fifth International Symposium. San Diego, CA, April, 1999.
- Clark, J.J.J.** 1998. Health Effects of Perchlorate and the New Reference Dose (RfD). Proceedings From the Groundwater Resource Association Seventh Annual Meeting, Walnut Creek, CA, October 23, 1998.
- Browne, T., **Clark, J.J.J.** 1998. Treatment Options For Perchlorate In Drinking Water. Proceedings From the Groundwater Resource Association Seventh Annual Meeting, Walnut Creek, CA, October 23, 1998.
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EXHIBIT B



WI #22-005.27

January 24, 2023

Aidan P. Marshall
Adams Broadwell Joseph & Cardozo
520 Capitol Mall, Suite 350
Sacramento, CA 95814

SUBJECT: 1050 La Cienega Project Sustainable Communities Environmental Assessment, Follow-up Comments on the Noise Analysis Response to Comments

Dear Mr. Marshall,

Wilson Ihrig has reviewed the response to comment (RTC) documents provided by the Project applicant in November 2022, including letters from Noah Tanski Environmental Consulting (NTEC) dated October 31, 2022 (RTC#1) and November 21, 2022 (RTC#2).

NTEC's responses are extensive, however they are largely non-responsive to the comments provided by Ms. Levins in her October 2022 letter. In these follow-up comments, rather than respond to each individual bullet response provided by NTEC, we have focused on explaining the relevance of Ms. Levins' original comments, and, where needed, we have provided rebuttals to the RTC provided by NTEC. In the main, all of the initial comments from Ms. Levins still stand, as the RTC letters from NTEC provide no additional evidence or alternative analysis to substantiate several of the SCEA's conclusions.

Baseline Noise Levels are not Properly Established: Comment 1

The responses in the RTC letters are largely **non-responsive** to the questions and issues raised in Ms. Levins' original letter.

Measurement locations

Ms. Levins observes that the ambient locations selected in the SCEA are not sufficient to document the noise level at the residences on S. Alfred Street. The RTC#2 letter reiterates the SCEA explanation that the increased distance from the measurement location along La Cienega Blvd. to the residences on Alfred Street were taken into account to estimate the noise level (RTC#2 page 2). ***The distances used for this calculation are not provided in the SCEA or in either RTC letter.***

We note that the RTC#2 letter from NTEC describes some difficulty they experienced gaining access to a location closer to the S. Alfred Street residences, and as NTEC points out in the October and November letters, the SCEA does state in a footnote on Table XIII-5 that '[t]he ambient noise level for South Alfred Street residences, specifically the west-facing portions of these residences that directly

abut or face the Project site, was estimated with respect to this receptor's distance from La Cienega Boulevard, its primary source of ambient noise." The SCEA does not, however, identify the formula or distances that were used to make the adjustment from 69.2 to 62.1 dBA was made. According to the noise location map in Appendix H (page 84), noise measurement location 1 was on the sidewalk of La Cienega Blvd in front of the project site. Per drawing A1.01 in Appendix A of the SCEA, the setback from the centerline of La Cienega Blvd to the sidewalk is about 35 feet and the setback to the residence property line is about 200 feet (further to the residences themselves). Depending on the equation, this change in distance could result in an adjustment of 15 dB to 7 dB depending on the assumptions used. ***Neither the SCEA nor the RTC letters clarify this.***

Existing Shielding

Ms. Levins' letter also makes the point that there are structures that provide shielding of traffic noise from La Cienega Blvd. which does not appear to have been taken into account. The point being that the existing ambient in the backyards of these residences along Alfred Street could be ***lower*** than estimated in the SCEA, since the ground floor of the residences would be partially shielded by the row of garage structures between the residences and the project, resulting in possibly even lower ambient which would affect the thresholds and significance analyses. ***The RTC#2 letter does not provide any response or clarification on these issues.***

Time of Day and Duration

Furthermore, Ms. Levins, comments that the SCEA provides no information that provides context to understand the ambient noise measurements in the SCEA. Traffic noise, in particular, varies throughout the day, and the SCEA lack information regarding the time of day the measurements were taken or the length of the measurements.

The two NTEC letters do provide additional information on the ambient measurement duration and time of day. However, there is no evidence or discussion that measurements of 15 minutes during mid-day traffic is sufficient to document typical site conditions. Ambient levels throughout the day could be higher or lower than what was measured. Noise levels from traffic noise fluctuate throughout the day and week and 15 minutes represent 1% of a 24-hour period. This is why it is common practice in traffic noise studies to conduct a long-term measurement to aid in establishing an appropriate ambient. At the very least, Caltrans TeNS Section 3.3.2. recommends at least 20 to 30-minute durations for low traffic volumes (<500 vehicles per hour per lane).¹

A lower ambient at the S. Alfred Street residences would affect ambient-based project thresholds at those noise sensitive receptors. ***Thus, as presented in the SCEA with supplemental information provided in the RTC letters, the baseline noise levels are still not properly established.***

Construction Noise Analysis is Incomplete: Comment 2

Upper-level construction phases

Ms. Levins notes that the construction analysis in the SCEA does not consider noise levels during the erecting of upper stories of the building and does not provide evidence that the mitigation measures provided for the at grade construction phases would be effective for this work. Since no information was provided in the SCEA for the equipment to be used for the upper floor construction, Ms. Levins

¹ <https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tens-sep2013-a11y.pdf>

provides a hypothetical list of equipment and shows that there would be a potentially significant impact that would require mitigation.

The RTC#2 letter takes issue with the equipment selection in Ms. Levins' analysis but does not provide an alternative list or analysis of construction activity for the upper stories of the building, nor does it show calculations that this activity would be below project thresholds. In RTC#2 (page 6, Table 1), NTEC does provide alternative reference levels for Ms. Levins' equipment list. As a point of clarification the RCNM 1.1 reference levels used by Ms. Levins are still in wide use, they are not obsolete, contrary to what NTEC states in RTC#2. The RCNM 2.0 reference levels provided by NTEC in Table 1 would in some cases result in higher predicted levels, depending on equipment, with the result that construction noise from upper level activities would still require mitigation.

The SCEA Regulatory Framework section clearly states that the LAMC regulations would apply to the Project's temporary construction and long-term activities. As noted in the SCEA, the Threshold and Significance subsection establishes criteria of 5 dB above ambient levels for construction activities lasting more than 10 days, rather than adopting the LAMC noise limit as a significance threshold. The example above for ground construction work presented by Ms. Levins exceed both the 75 dB LAMC noise limit and the 5 dB ambient based threshold (62.1 dBA per the SCEA). Furthermore, as discussed above, this significance threshold is still subject to a properly established ambient level at the S. Alfred Street residences.

NTEC's responses to Comment 2 are non-responsive.

Operational Noise Analysis is Lacking: Comments 3 and 4

These comments are non-responsive. As Ms. Levins notes, the SCEA does not provide quantitative analysis for mechanical equipment noise or data on the equipment expected to be used for the project. We note that the RTC#2 indicates (page 7) that some of the equipment will be located within the building envelope. However, a 28-story building is likely to have a mid-level mechanical room which must ventilate via louvers to the exterior. Mechanical drawings were not included in the SCEA Appendix A. It should be verified that there aren't exposed HVAC sources on lower levels of the project and shown that they will not exceed project significance thresholds. As noted by NTEC in RTC#2 (page 8), CEQA requires that significance determinations "must be supported by *accurate scientific and factual data.*" ***NTEC's RTC#2 letter is non-responsive as it does not provide any alternative information in the form of new reference level data or factual data as evidence for the qualitative statements made in the SCEA regarding mechanical equipment.***

Operational Noise from Voices and Threshold: Comment 5

Ms. Levins' comments provide hypothetical predictions for several scenarios of activity on the pool deck/terrace level, with varying size and speech volume levels. Her calculations are based on a slant distance to the S. Alfred Street residences, which is in fact about 30 feet from a speaker at the terrace edge to the 3rd story of the nearest S. Alfred Street residence based on the project drawings. **The RTC#2 letter (page 9) erroneously calls out Ms. Levins' distance as an error.**

The NTEC RTC#2 letter responses do not provide alternate calculations or facts and do not directly address the size of gatherings expected or provide alternative reference level to one provided by Ms. Levins. The range of speech levels provided in the SCEA, provided by an **old 1977** EPA reference document, does not identify the size of a crowd, but rather identifies the effect of background noise levels on the volume of a speaker. The NTEC RTC#2 response (page 8) indicates some shielding is

expected from the glass wall around the terrace parameter, but does not provide evidence in the form of data or calculations to support the expected attenuation reported in the analysis. There are more contemporaneous reference papers and software available to estimate the sound generated by people engaged in recreational activities based on crowd size and activity. **The RTC#2 letter provides no quantitative analysis to respond to Ms. Levins' comments.**

Finally, as noted by Ms. Levins, the threshold criteria adopted by the project are ambient based. The noise measurements conducted for the SCEA do not properly establish the baseline noise levels at the S. Alfred Street residences, especially in the evening when noise from social activity would be expected from the community roof deck. **The RTC#2 letter provides no quantitative analysis to respond to Ms. Levins' comments.**

Conclusions

The response to comments provided in letters dated October 31, 2022 and November 21, 2022 by Noah Tanski Environmental Consulting (NTEC) do not address the errors and omissions in the SCEA noise analysis outlined by Ms. Levins in October of 2022.

Please feel free to contact me with any questions on this information.

Very truly yours,

WILSON IHRIG



Ani Toncheva
Senior Consultant



ANI TONCHEVA

Senior Consultant

Since joining the firm in 2011, Ani has conducted analyses for transit systems, vibration sensitive research facilities, public infrastructure, construction, and other environmental noise. She has contributed to literature reviews, including research on current practices of historical preservation. She has extensive experience working on construction projects in New York City and is well versed in local noise codes.

Education

- B.A., Physics; Bard College, New York

Professional Associations

- *Member*, National Council of Acoustical Consultants (NCAC)
- *Member*, Acoustical Society of America (ASA)
- *Board Member*, Transportation Research Forum (TRF), NY Chapter and International board

Research Paper

- NCHRP 25-25, *Current Practices to Address Construction Vibration and Potential Effects to Historic Buildings Adjacent to Transportation Projects*

Relevant Experience

BART Berryessa Station Transit Noise Impact and Mitigation, San Jose, CA Assisted with noise predictions and barrier design recommendations.

Massachusetts Bay Transportation Authority (MBTA) Green Line Extension (GLX), Boston, MA Lead analyst on noise predictions and barrier design.

RTD Eagle P3 Northwest Corridor Noise and Impacts, Denver, CO Assisted with data analysis and helped prepare final technical report.

Alameda CTC, I-880 Interchange Improvements Project (Whipple Road-Industrial Southwest and Industrial Parkway West), Hayward, CA Project Manager for traffic noise study.

Alameda CTC, I-80/Ashby Avenue Interchange Improvements, Berkeley, CA Project Manager for traffic noise study.

Millennium Bulk Terminal, Longview, WA Prepared noise analysis for the project's NEPA and SEPA environmental impact statements.

Peninsula Humane Society & SPCA Haskin Hill Sanctuary, Loma Mar, CA Prepared an environmental study for a planned animal sanctuary in Loma Mar.

Analog (ArtX) Hotel, Palo Alto, CA Prepared preliminary basis of design guidelines for a new five-story boutique hotel in a residential area.

Sunnydale Block 3A & 3B Mixed-Use Residential Development, San Francisco, CA Prepared a CCR Title 24 Noise Study Report for two, mixed-use, 5-story buildings.

Columbia University Medical Center Medical and Graduate Education Building, New York, NY
Conducted baseline noise survey and performed attended noise measurements during preliminary construction work.

Hudson Yards Tower C Foundations and Utilities, New York, NY
Conducted a baseline noise survey prior to construction work including a combination of long-term unattended and short-term attended noise measurements.

PANYNJ Lincoln Tunnel Helix Rehabilitation, NJ
Assisted in developing construction noise control and mitigation plan and implementing a remote long-term noise monitoring program at three locations.

MSK 74th Street, New York, NY
Conducted baseline noise survey, assisted in developing construction noise control and mitigation plan, and implemented a long-term noise monitoring program at two locations.

NY MTA No. 7 Line Subway Extension Ventilation Facility Construction, New York, NY
The project involved mining and lining of two shafts and construction of a 2-story ventilation building.

NY MTA ESA/LIRR Grand Central Terminal Fit-Out, New York, NY
Prepared the Contractor's noise and vibration control plan updates for fit-out work conducted underground at the Grand Central Terminal Suburban Level.

San Francisco Planning Department, Alameda Street Wet Weather Tunnel and Folsom Area Sewer Improvement, San Francisco, CA
Noise and vibration analysis for Folsom Area stormwater infrastructure improvements.

World Trade Center Vehicle Security Center, New York, NY
Conducted baseline noise surveys, assisted in developing construction noise control plans, and implementing a remote long-term noise monitoring program.

50 Pine Street Condominiums, New York, NY
Project involved evaluating mechanical noise at residential dwelling units for NYC noise code

Uptown Newport, Newport Beach, CA
Evaluation of noise levels due to mechanical equipment at adjacent property.

EXHIBIT C

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October 21, 2022

Via Email and Overnight Mail

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Re: Comments on the Sustainable Communities Environmental Assessment for the 1050 La Cienega Boulevard Project (SCH No. 2022090143; Case Nos. ENV-2022-2280-SCEA; DIR-2022-2279-TOC-SPR-VHCA).

Dear Mr. Netburn:

We are writing on behalf of Coalition for Responsible Equitable Economic Development Los Angeles (“CREED LA”) to provide comments on the Sustainable Communities Environmental Assessment (“SCEA”) prepared by the City of Los Angeles (“City”) for the 1050 La Cienega Boulevard Project (SCH No. 2022090143; Case Nos. ENV-2022-2280-SCEA; DIR-2022-2279-TOC-SPR-VHCA) (“Project”), proposed by 1050 La Cienega, LLC (“Applicant”).

The Project entails the removal of a vacant lot and the construction of a new 332-foot in height, 28-story, 297,690-square-foot, mixed-use building with 290 dwelling units, including 29 Extremely Low Income affordable housing units, and approximately 7,500 square feet of new commercial restaurant use.¹ The Project includes 426 vehicle parking spaces, 184 bicycle parking spaces, and 54,540 square feet of open space.² The Project is located at 1022, 1024, 1028, 1034, 1036, 1038, 1044, 1048, 1054, 1056, 1060, 1066 S. La Cienega Boulevard, Los Angeles, CA 90035.

¹ SCEA, pg. 2-1.

² *Id.*

The Project seeks discretionary approvals, including approval of Base and Additional Incentives pursuant to Los Angeles Municipal Code (“LAMC”) Section 12.22 A.31 and the Transit Oriented Communities Affordable Housing Incentive Program Guidelines (“TOC Guidelines”). These Incentives include (1) up to 70 percent increase in density, (2) 0.5 minimum required parking spaces for residential units, (3) 30 percent parking reduction for nonresidential (TOC Guidelines, (4) Floor Area Ratio (“FAR”) of a 3.75:1 in a commercial zone, and (5) utilize any or all of the yard requirements for the RAS3 zone.³ The Project also seeks, pursuant to LAMC Sections 16.05.C and 16.05.D, site plan review for a project for which by-right units minus existing units is greater than 50 units.

We reviewed the SCEA and its technical appendices with the assistance of air quality and health risk expert James Clark, Ph.D.⁴ We also received technical assistance from noise expert Jen Levins.⁵ The City must separately respond to these technical comments.

Based upon our review of the SCEA and supporting documentation, we conclude that the SCEA fails to comply with the requirements of CEQA. As explained more fully below, the SCEA does not accurately disclose potentially significant air quality, energy, and noise impacts. The SCEA also fails to disclose significant health risk impacts due to exposure from diesel particulate matter (“DPM”), and fails to fully disclose and mitigate health risks from disturbance and transport of toxic materials. The SCEA also includes errors in its project description and description of the environmental setting. As a result of its shortcomings, the SCEA lacks substantial evidence to support its conclusions and fails to properly mitigate the Project’s significant environmental impacts. The City cannot approve the Project until the errors and omissions in the SCEA are remedied in a Sustainable Communities Environmental Impact Report (“SCEIR”)⁶ that is recirculated for public review and comment.

I. STATEMENT OF INTEREST

CREED LA is an unincorporated association of individuals and labor organizations that may be adversely affected by the potential public and worker health and safety hazards, and the environmental impacts of the Project. The

³ SCEA, pg. 2-18, 19.

⁴ Dr. Clark’s technical comments and curricula vitae are attached hereto as **Exhibit A** (“Clark Comments”)

⁵ Ms. Levins’ technical comments and curricula vitae are attached hereto as **Exhibit B**.

⁶ Pub. Res. Code § 21155.2(c)(2).

coalition includes the Sheet Metal Workers Local 105, International Brotherhood of Electrical Workers Local 11, Southern California Pipe Trades District Council 16, and District Council of Iron Workers of the State of California, along with their members, their families, and other individuals who live and work in the City of Los Angeles.

Individual members of CREED LA and its member organizations live, work, recreate, and raise their families in the City of Los Angeles and surrounding communities. Accordingly, they would be directly affected by the Project's environmental and health and safety impacts. Individual members may also work on the Project itself. They will be first in line to be exposed to any health and safety hazards that exist onsite.

CREED LA seeks to ensure a sustainable construction industry over the long-term by supporting projects that have positive impacts for the community, and which minimize adverse environmental and public health impacts. CREED LA has an interest in enforcing environmental laws that encourage sustainable development and ensure a safe working environment for its members. Environmentally detrimental projects can jeopardize future jobs by making it more difficult and more expensive for business and industry to expand in the region, and by making the area less desirable for new businesses and new residents. Indeed, continued environmental degradation can, and has, caused construction moratoriums and other restrictions on growth that, in turn, reduce future employment opportunities.

II. LEGAL BACKGROUND

CEQA requires that an agency analyze the potential environmental impacts of its proposed actions in an environmental impact report ("EIR") (except in certain limited circumstances).⁷ The EIR is the very heart of CEQA.⁸ "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."⁹

CEQA has two primary purposes. First, CEQA is designed to inform decision makers and the public about the potential, significant environmental effects of a

⁷ See, e.g., PRC § 21100.

⁸ *Dunn-Edwards v. BAAQMD* (1992) 9 Cal.App.4th 644, 652.

⁹ *Comtys. for a Better Env' v. Cal. Res. Agency* (2002) 103 Cal. App.4th 98, 109 ("*CBE v. CRA*").

project.¹⁰ “Its purpose is to inform the public and its responsible officials of the environmental consequences of their decisions before they are made. Thus, the EIR “protects not only the environment but also informed self-government.”¹¹ The EIR has been described as “an environmental ‘alarm bell’ whose purpose it is to alert the public and its responsible officials to environmental changes before they have reached ecological points of no return.”¹²

Second, CEQA requires public agencies to avoid or reduce environmental damage when “feasible” by requiring “environmentally superior” alternatives and all feasible mitigation measures.¹³ The EIR serves to provide agencies and the public with information about the environmental impacts of a proposed project and to “identify ways that environmental damage can be avoided or significantly reduced.”¹⁴ If the project will have a significant effect on the environment, the agency may approve the project only if it finds that it has “eliminated or substantially lessened all significant effects on the environment where feasible” and that any unavoidable significant effects on the environment are “acceptable due to overriding concerns.”¹⁵

A. Streamlined Environmental Review for Transit Priority Projects

CEQA allows for the streamlining of environmental review for “transit priority projects” meeting certain criteria.¹⁶ To qualify as a transit priority project, a project must

- 1) contain at least 50 percent residential use, based on total building square footage and, if the project contains between 26 percent and 50 percent nonresidential uses, a floor area ratio of not less than 0.75;
- 2) provide a minimum net density of at least 20 dwelling units per acre; and
- 3) be within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan.¹⁷

¹⁰ 14 CCR § 15002(a)(1).

¹¹ *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal. 3d 553, 564.

¹² *Berkeley Keep Jets Over the Bay v. Bd. of Port Comm’rs.* (2001) 91 Cal. App. 4th 1344, 1354 (“*Berkeley Jets*”); *County of Inyo v. Yorty* (1973) 32 Cal.App.3d 795, 810.

¹³ 14 CCR§ 15002(a)(2) and (3); *see also Berkeley Jets*, 91 Cal.App.4th at 1354; *Citizens of Goleta Valley*, 52 Cal.3d at 564.

¹⁴ 14 CCR §15002(a)(2).

¹⁵ PRC § 21081; 14 CCR § 15092(b)(2)(A) & (B).

¹⁶ Pub. Res. Code §§ 21155, 21155.1, 21155.2.

¹⁷ Pub. Res. Code § 21155(b).

A transit priority project is eligible for CEQA's streamlining provisions where it is:

consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in either a sustainable communities strategy or an alternative planning strategy, for which the State Air Resources Board ... has accepted a metropolitan planning organization's determination that the sustainable communities strategy or the alternative planning strategy would, if implemented, achieve the greenhouse gas emission reduction targets.¹⁸

On September 3, 2020, the Regional Council of the Southern California Association of Governments ("SCAG") adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy ("2020-2045 RTP/SCS"), which was accepted by the California Air Resources Board ("CARB"). The final program EIR for the 2020-2045 RTP/SCS was certified on May 7, 2020.

If "all feasible mitigation measures, performance standards, or criteria set forth in the prior applicable environmental impact reports and adopted in findings made pursuant to Section 21081" are applied to a transit priority project, the project is eligible to conduct environmental review using a SCEA or an SCEIR.¹⁹ A SCEA must contain an initial study which "identif[ies] all significant or potentially significant impacts of the transit priority project ... based on substantial evidence in light of the whole record."²⁰ The initial study must also "identify any cumulative effects that have been adequately addressed and mitigated pursuant to the requirements of this division in prior applicable certified environmental impact reports."²¹ The SCEA must then "contain measures that either avoid or mitigate to a level of insignificance all potentially significant or significant effects of the project required to be identified in the initial study."²² The SCEA is not required to discuss growth inducing impacts or any project specific or cumulative impacts from cars and light-duty truck trips generated by the project on global warming or the regional transportation network.²³

After circulating the SCEA for public review and considering all comments, a lead agency may only approve the SCEA with findings that all potentially

¹⁸ Pub. Res. Code § 21155(a).

¹⁹ Pub. Res. Code § 21155.2.

²⁰ Pub. Res. Code § 21155.2(b)(1).

²¹ *Id.*

²² Pub. Res. Code § 21155.2(b)(2).

²³ Pub. Res. Code § 21159.28(a).

significant impacts have been identified and mitigated to a less-than-significant level.²⁴ A lead agency's approval of a SCEA must be supported by substantial evidence.²⁵

In this case, the City failed to conduct a proper analysis of the Project's noise, air quality, energy, hazards, and public health impacts. Furthermore, the SCEA fails to mitigate the significant effects of the Project, rendering the SCEA incomplete. The City must prepare a SCEIR in order to fully analyze and mitigate the Project's impacts.

III. THE PROJECT DESCRIPTION IS INADEQUATE

The SCEA does not meet CEQA's requirements because it fails to include an accurate and complete Project description, rendering the entire analysis inadequate. California courts have repeatedly held that "an accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR."²⁶ CEQA requires that a project be described with enough particularity that its impacts can be assessed.²⁷ Without a complete project description, the environmental analysis under CEQA is impermissibly limited, thus minimizing the project's impacts and undermining meaningful public review.²⁸ Accordingly, a lead agency may not hide behind its failure to obtain a complete and accurate project description.²⁹

CEQA Guidelines section 15378 defines "project" to mean "the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment."³⁰ "The term "project" refers to the activity which is being approved and which may be subject to several discretionary approvals by governmental agencies. The term project does not mean each separate governmental approval."³¹ Courts have explained that a complete description of a project must "address not only the immediate environmental consequences of going forward with the project,

²⁴ Pub. Res. Code § 21155(b)(3), (b)(4), (b)(5)

²⁵ Pub. Res. Code §21155(b)(7).

²⁶ *Stoepthemillenniumhollywood.com v. City of Los Angeles* (2019) 39 Cal.App.5th 1, 17; *Communities for a Better Environment v. City of Richmond* ("CBE v. Richmond") (2010) 184 Cal.App.4th 70, 85–89; *County of Inyo v. City of Los Angeles* (3d Dist. 1977) 71 Cal.App.3d 185, 193.

²⁷ 14 CCR § 15124; *see, Laurel Heights I, supra*, 47 Cal.3d 376, 192-193.

²⁸ *Id.*

²⁹ *Sundstrom v. County of Mendocino* ("Sundstrom") (1988) 202 Cal.App.3d 296, 311.

³⁰ CEQA Guidelines § 15378.

³¹ *Id.*, § 15378(c).

but also all “*reasonably foreseeable* consequence[s] of the initial project.”³² “If a[n]...EIR...does not adequately apprise all interested parties of the true scope of the project for intelligent weighing of the environmental consequences of the project, informed decision-making cannot occur under CEQA and the final EIR is inadequate as a matter of law.”³³

A. The SCEA Fails to Disclose the Construction Traffic Route

Regarding the traffic routes during Project construction, the SCEA states that “[t]ruck routes are expected to utilize the most convenient access to freeway ramps... The truck routes would comply with the approved truck routes designated within the City and/or adjacent jurisdictions... Trucks traveling to and from the Project Site must travel along the designated routes.”³⁴ The Transportation Assessment similarly states: “Haul trucks would travel on approved truck routes designated within the City and take the most direct route to the appropriate freeway ramps... The haul route will be reviewed by the City.”³⁵ The SCEA lacks any further description of the haul route. As a result, the SCEA fails to disclose the extent of impacts related to the haul route that may ultimately be selected for the Project, and lacks effective mitigation measures to ensure that any significant impacts caused by the haul route would be mitigated to less than significant levels.

As a result of this ambiguous project description, the SCEA improperly defers analysis of the impacts from construction traffic. Construction traffic generates health risk, noise, and safety impacts. Here, excavation for the Project would require an estimated 48,913 cubic yards of cut soils to be removed and exported to a regional landfill.³⁶ This process will require truck trips. The Project will also generate numerous truck trips during the various phases of the Project’s construction: “250 daily truck trips (125 inbound, 125 outbound) are forecasted to occur during the shoring / excavation phase, with approximately 42 trips per hour (21 inbound, 21 outbound) uniformly over a typical six-hour off-peak hauling period.”³⁷ The SCEA acknowledges that these trips would generate health risk and noise impacts, yet fails to disclose the severity of those impacts on sensitive receptors located along the haul route, because the haul route remains uncertain.³⁸

³² *Laurel Heights I*, 47 Cal. 3d 376, 398 (emphasis added); see also *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal. 4th 412, 449-50.

³³ *Riverwatch v. Olivenhain Municipal Water Dist.* (2009) 170 Cal. App. 4th 1186, 1201.

³⁴ SCEA, pg. 2-18.

³⁵ SCEA, Appendix J-1, pg. 80.

³⁶ SCEA, pg. 5-162.

³⁷ SCEA, Appendix J-1, pg. 80.

³⁸ SCEA, pg. 5-25.

Regarding noise, the SCEA states “[a]ccording to FHWA TNM 2.5 modeling, 42 haul trips per hour (21 empty inbound trips and 21 loaded outbound trips) would generate roadside noise levels of 62.6 dBA Leq.”³⁹ The SCEA compares this impact to existing noise levels on La Cienega Boulevard,⁴⁰ but nothing in the SCEA or other publicly available Project documents binds the Applicant to using La Cienega Boulevard as the exclusive haul route. As a result, the haul route could be shifted to another location. If a different route is used, impacts could be more severe than analyzed along La Cienega Boulevard. The SCEA fails to disclose impacts on the receptors along any other potential haul route. If an alternate route has lower existing ambient noise levels than La Cienega Boulevard, impacts on those receptors will be more severe than disclosed in the SCEA.

As a result of its failure to clearly describe the construction haul route, the SCEA lacks substantial evidence to support its conclusion that construction impacts associated with the haul route would be less than significant. Depending on the final location selected for the haul route, the route could result in potentially significant health risk and noise impacts on receptors that have not been considered in the SCEA.

IV. THE SCEA FAILS TO ADEQUATELY ANALYZE, QUANTIFY, AND MITIGATE THE PROJECT’S POTENTIALLY SIGNIFICANT IMPACTS

An SCEA must fully disclose all potentially significant impacts of a project, and implement all feasible mitigation to reduce those impacts to less than significant levels. The lead agency’s significance determination with regard to each impact must be supported by accurate scientific and factual data.⁴¹ An agency cannot conclude that an impact is less than significant unless it produces rigorous analysis and concrete substantial evidence justifying the finding.⁴²

Moreover, the failure to provide information required by CEQA is a failure to proceed in the manner required by law.⁴³ Challenges to an agency’s failure to proceed in the manner required by CEQA, such as the failure to address a subject required to be covered in an EIR or to disclose information about a project’s

³⁹ SCEA, pg. 5-162.

⁴⁰ SCEA, pg. 5-162.

⁴¹ 14 CCR § 15064(b).

⁴² *Kings Cty. Farm Bur. v. Hanford* (1990) 221 Cal.App.3d 692, 732.

⁴³ *Sierra Club v. State Bd. Of Forestry* (1994) 7 Cal.4th 1215, 1236.

environmental effects or alternatives, are subject to a less deferential standard than challenges to an agency’s factual conclusions.⁴⁴

Even when the substantial evidence standard is applicable to agency decisions to certify an EIR and approve a project, reviewing courts will not ‘uncritically rely on every study or analysis presented by a project proponent in support of its position. A clearly inadequate or unsupported study is entitled to no judicial deference.’⁴⁵

A. The SCEA Fails to Disclose and Mitigate Significant Health Risks

a. The SCEA Fails to Disclose and Mitigate Significant Health Risks from Construction Emissions

The SCEA acknowledges that the Project’s construction activities would generate Toxic Air Contaminant (“TAC”) emissions.⁴⁶ Specifically, operation of heavy equipment would generate DPM, a type of TAC.⁴⁷ The SCEA further acknowledges that DPM is carcinogenic.⁴⁸ The City prepared a Health Risk Assessment (“HRA”) to analyze the Project’s construction health risk impacts on nearby sensitive receptors. The significance threshold for this Project provides that a significant health risk impact occurs if the Project would expose sensitive receptors to air contaminants that exceed the maximum incremental cancer risk of 10 in one million.⁴⁹ The results of the City’s HRA show that carcinogenic risk and noncarcinogenic hazard estimates for the maximum exposed sensitive receptors do not exceed identified significance thresholds.⁵⁰ But the City’s HRA fails to adequately analyze the health risk impacts on especially vulnerable receptors like young children and the elderly.

An agency must support its findings of a project’s potential environmental impacts with concrete evidence – with “sufficient information to foster informed public participation and to enable the decision makers to consider the

⁴⁴ *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 435.

⁴⁵ *Berkeley Jets*, 91 Cal.App.4th at 1355.

⁴⁶ SCEA, pg. 5-25.

⁴⁷ *Id.*

⁴⁸ *Id.*

⁴⁹ Appendix B2: 1050 La Cienega Boulevard Project - Construction Health Risk Assessment (August 8, 2022), Pg. 8.

⁵⁰ SCEA, pg. 5-26.

environmental factors necessary to make a reasoned decision.”⁵¹ A project’s health risks “must be ‘clearly identified’ and the discussion must include ‘relevant specifics’ about the environmental changes attributable to the Project and their associated health outcomes.”⁵² CEQA mandates discussion, supported by substantial evidence, of the nature and magnitude of impacts of air pollution on public health.⁵³

Here, the City failed to adequately analyze the health risk impacts on especially vulnerable receptors like young children and the elderly by not employing “early life exposure adjustment factors” or “age sensitivity factors” (collectively, “ASFs”). ASFs reflect that young children and the elderly are more vulnerable to the health effects of DPM and other TACs.⁵⁴ ASFs account for increased sensitivity of children by weighting the impacts of their exposure to a project’s estimated emissions of TACs. The City attempts to justify its refusal to apply ASFs to its health risk analysis by relying on an incorrect and unsupported interpretation of U.S. EPA guidance,⁵⁵ which provides that ASFs are only considered when TACs act “through the mutagenic mode of action.”⁵⁶ The City argues that DPM is not mutagenic because only a percent of its constituent particles is mutagenic – and as a result, use of ASFs is not required for measuring DPM health impacts. However, this assertion is unsupported. Many expert agencies, including U.S. EPA itself, clearly identify DPM as mutagenic. U.S. EPA’s Chemical Assessment Summary for Diesel Particulate Matter plainly states that DPM is mutagenic:

[D]iesel exhaust (DE) is likely to be carcinogenic to humans by inhalation from environmental exposures. The basis for this conclusion includes the following lines of evidence: [...] **extensive supporting data including the demonstrated mutagenic and/or chromosomal effects of DE** and its organic constituents, and knowledge of the known mutagenic and/or

⁵¹ *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 516.

⁵² *Id.* at 518.

⁵³ *Sierra Club*, 6 Cal.5th at 518–522.

⁵⁴ See also SCEA, pg. 5-16 (stating that “[t]hose most vulnerable to the non-cancer health effects of diesel PM are children whose lungs are still developing and the elderly who may have other chronic health problems.”).

⁵⁵ U.S. EPA. 2006. Memorandum – Implementation of the Cancer Guidelines and Accompanying Supplemental Guidance – Science Policy Council Cancer Guidelines Implementation Workgroup Communication II: Performing Risk Assessments That Include Carcinogens Described in the Supplemental Guidance as having a Mutagenic Mode of Action.

⁵⁶ Appendix B2, pg. 5-6.

carcinogenic activity of a number of individual organic compounds that adhere to the particles and are present in the DE gases.⁵⁷ [emphasis added]

Thus, the U.S. EPA clearly identifies DPM as a mutagenic carcinogen, contrary to the statement in the SCEA. Even by the City's preferred methodology, the effect of the Project's DPM emissions on children must be analyzed using ASFs. Further, Dr. Clark identifies additional guidance from the Scientific Review Panel identifying DPM as mutagenic.⁵⁸ He also explains that the City of Los Angeles's own Air Quality And Health Effects guidance⁵⁹ provides that exposure to DPM may be *particularly* harmful to children, whose lungs are still developing.⁶⁰ In sum, the leading scientific authorities identify DPM as mutagenic, requiring use of ASFs to analyze impacts. In contrast, the City's contention that a TAC is not mutagenic unless all of its constituent compounds are mutagenic is unsupported by scientific authority. As a result, the SCEA's HRA lacks an accurate assessment of the severity of health impacts on young children and the elderly. The SCEA also fails to provide the legally required discussion, supported by substantial evidence, of the nature and magnitude of impacts of air pollution on public health, as required by CEQA.⁶¹

Adequate disclosure and mitigation of the Project's health risk impacts is especially important for this Project due to its proximity to residential land uses occupied by children and the elderly, as demonstrated in the figure⁶² (provided in the SCEA's noise analysis) below.

⁵⁷ U.S. Environmental Protection Agency, Integrated Risk Information System (IRIS) Chemical Assessment Summary: Diesel engine exhaust; CASRN N.A., pg. 11, available at https://iris.epa.gov/static/pdfs/0642_summary.pdf.

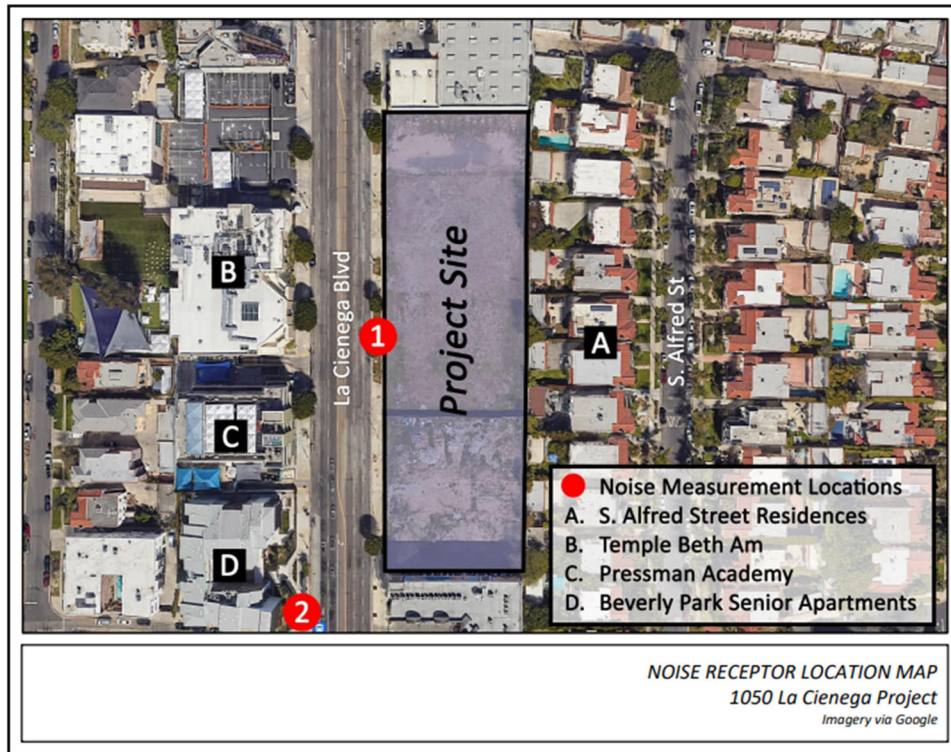
⁵⁸ Clark Comments, pg. 7.

⁵⁹ City of Los Angeles, Department of City Planning. 2019. Air Quality And Health Effects. Pg 10

⁶⁰ Clark Comments, pg. 5.

⁶¹ *Sierra Club*, 6 Cal.5th at 518–522.

⁶² Appendix H, Noise Receptor Location Map.



The figure above shows that a school is located 90 feet west of the Project site.⁶³ The figure shows that residences on South Alfred Street about the Project site. The figure also shows that senior citizen apartments are located across La Cienega Boulevard. As a result, the SCEA's inadequate disclosure and analysis of the Project's health risk impacts on especially sensitive receptors like children and the elderly requires the City to withdraw the SCEA and prepare an SCEIR.

Dr. Clark corrected the City's analysis to implement the appropriate ASFs, and found that the Project's construction impacts exceed the 10 in 1 million threshold.⁶⁴ Specifically, when analyzing the exposure for the receptor at the most sensitive age (children less than 2 years of age), the resulting risk to the receptor is 88 in 1,000,000 for the nearly three-year construction phase exposure.⁶⁵ This exceeds the 10 in 1 million significance threshold. Thus, the SCEA fails to disclose a potentially significant public health impact, in violation of CEQA. An SCEIR must be prepared to disclose and mitigate this impact.

⁶³ Pressman Education Center and Academy, affiliated with Temple Beth Am, located at 1055 La Cienega Boulevard.

⁶⁴ Clark Comments, pg. 7-8.

⁶⁵ Clark, pg. 8.

b. A Health Risk Analysis for Project Operation is Necessary Under CEQA to Adequately Analyze and Disclose the Project's Operational Health Risk Impacts

The City did not conduct a HRA for the Project's operations, and states that the construction HRA was merely provided for informational purposes.⁶⁶ This approach does not satisfy CEQA's requirements regarding disclosure and analysis of health risks.

Courts have held that an environmental review document must disclose a project's potential health risks to a degree of specificity that would allow the public to make the correlation between the project's impacts and adverse effects to human health.⁶⁷ In *Bakersfield Citizens for Local Control v. City of Bakersfield*, the court found that the EIRs' description of health risks were insufficient and that after reading them, "the public would have no idea of the health consequences that result when more pollutants are added to a nonattainment basin."⁶⁸ Likewise, in *Sierra Club*, the California Supreme Court held that the EIR's discussion of health impacts associated with exposure to the named pollutants was too general and the failure of the EIR to indicate the concentrations at which each pollutant would trigger the identified symptoms rendered the report inadequate.⁶⁹ Some connection between air quality impacts and their direct, adverse effects on human health must be made. As the Court explained, "a sufficient discussion of significant impacts requires not merely a determination of whether an impact is significant, but some effort to explain the nature and magnitude of the impact."⁷⁰ CEQA mandates discussion, supported by substantial evidence, of the nature and magnitude of impacts of air pollution on public health.⁷¹

Here, the Project's construction involves construction equipment and vehicles that emit DPM. Per the court decisions discussed above, it is insufficient merely to state that a Project will emit some amount of TACs, and that exposure to those TACs will or will not be significant. The City is required to explain the magnitude of the impact and resultant health impacts. Due to the proximity of the nearest sensitive receptors, the vulnerable age of those receptors, and the number of TAC-emitting sources involved in construction, the City's HRA cannot just be considered

⁶⁶ SCEA, pg. 5-26.

⁶⁷ *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184.

⁶⁸ *Id.* at 1220.

⁶⁹ *Sierra Club*, at 521.

⁷⁰ *Id.* at 519, citing *Cleveland National Forest Foundation v. San Diego Assn. of Governments* (2017) 3 Cal.5th 497, 514–515.

⁷¹ *Sierra Club*, 6 Cal.5th at 518–522.

a supplemental analysis, but a required portion of the disclosures required by CEQA.

The qualitative analysis relied on by the City for the operational phase of the Project is also inadequate disclosure. The Project's operations are reasonably expected to include sources that generate TACs. These include truck trips, and potentially an emergency generator.⁷² Backup generators commonly rely on fuels such as natural gas or diesel,⁷³ and thus can significantly impact public health through DPM emissions.⁷⁴ Due to the proximity of the nearest sensitive receptors to these sources of DPM, the Project's operations may result in potentially significant impacts. The City must prepare an HRA to evaluate the magnitude of the Project's health risk impacts in accordance with CEQA.

c. The SCEA Fails to Adopt Applicable and Feasible Mitigation

As demonstrated in Dr. Clark's comments, the Project would have a significant health risk impact during the construction phase. CEQA requires that the City implement all feasible mitigation to reduce impacts to less-than-significant levels. But the Project's significant health risk impacts are currently unmitigated.⁷⁵ Thus, an SCEIR must be prepared in which the City adopts applicable and feasible

⁷² Levins Comments, pg. 2.

⁷³ SCAQMD, Fact Sheet on Emergency Backup Generators, <http://www.aqmd.gov/home/permits/emergency-generators> ("Most of the existing emergency backup generators use diesel as fuel").

⁷⁴ California Air Resources Board, Emission Impact: Additional Generator Usage Associated with Power Outage (January 30, 2020), available at <https://ww2.arb.ca.gov/resources/documents/emissions-impact-generator-usage-during-psps> (showing that generators commonly rely on gasoline or diesel, and that use of generators during power outages results in excess emissions); California Air Resources Board, Use of Back-up Engines for Electricity Generation During Public Safety Power Shutoff Events (October 25, 2019), available at <https://ww2.arb.ca.gov/resources/documents/use-back-engines-electricity-generation-during-public-safety-power-shutoff> ("When electric utilities de-energize their electric lines, the demand for back-up power increases. This demand for reliable back-up power has health impacts of its own. Of particular concern are health effects related to emissions from diesel back-up engines. Diesel particulate matter (DPM) has been identified as a toxic air contaminant, composed of carbon particles and numerous organic compounds, including over forty known cancer-causing organic substances. The majority of DPM is small enough to be inhaled deep into the lungs and make them more susceptible to injury. Much of the back-up power produced during PSPS events is expected to come from engines regulated by CARB and California's 35 air pollution control and air quality management districts (air districts)").

⁷⁵ SCEA, pg. 4-8 (arguing that none of the construction emission measures in PMM AQ-1 are applicable to the Project).

mitigation measures from PMM AQ-1, such as requiring the Project to use Tier 4 Final equipment or better.⁷⁶

d. The Project Conflicts With Policies Regarding Air Quality and Health Risk

The CEQA Guidelines provide that a significant air quality impact would occur when a project “[c]onflict[s] with or obstruct implementation of the applicable air quality plan.”⁷⁷ Further, the Guidelines provide that a significant impact would occur if a project conflicts with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect.⁷⁸

Policy 1.3.1 of the City of Los Angeles’ General Plan Air Quality Element provides: “[m]inimize particulate emissions from construction sites.”⁷⁹ But here, the Project does not attempt to minimize DPM emissions from the Project’s construction, or even set minimum emissions standards for construction equipment. Nor does the SCEA adopt any of the mitigation measures recommended in PMM AQ-1. And the Project does not provide evidence that the particulate emissions measures in PMM AQ-1 or elsewhere are infeasible or ineffective. Thus, the Project fails to “minimize” PM emissions.

Policy 5.3.1 of the Air Quality Element provides: “Support the development and use of equipment powered by electric or low-emitting fuels.”⁸⁰ Here, the SCEA does not propose or evaluate the feasibility of electric or low-emission equipment during construction. Nor does the Project propose or evaluate the feasibility of utilizing existing power sources (e.g., power poles) or clean fuel generators rather than temporary power generators. During operations, the Project does not prohibit or consider the feasibility of prohibiting gas-powered landscape maintenance equipment. And the SCEA does not include other discussion of electric/low-emitting equipment. Due to the failure to analyze these options, the Project is inconsistent with Policy 5.3.1. The SCEA must be revised to include analysis evaluating these and other low-emitting fuel measures.

⁷⁶ SCEA, pg. 4-10.

⁷⁷ CEQA Guidelines, Appendix G, subd. III.

⁷⁸ CEQA Guidelines, Appendix G, subd. X.

⁷⁹ SCEA, pg. 5-20.

⁸⁰ SCEA, pg. 5-21.

B. The SCEA Fails to Adequately Analyze the Project's Potentially Significant Energy Impacts

The SCEA does not include sufficient investigation into energy conservation measures that might be available or appropriate for the Project. The Project is expected to consume 1,834,766 kilowatt-hour per year (kw-h/yr) of electricity, and 11,891 Thousand British Thermal Units per year (kBTU) of natural gas. But as will be discussed in more detail below, the SCEA does not sufficiently consider energy conservation measures like solar facilities, use of alternate fuel sources, and passive energy efficiency measures to ensure the Project's energy consumption would not be wasteful, inefficient, or unnecessary. This failure of analysis violates CEQA.

CEQA requires an environmental document to discuss mitigation measures for significant environmental impacts, including "measures to reduce the wasteful, inefficient, and unnecessary consumption of energy."⁸¹ The CEQA Guidelines require discussion of energy conservation measures when relevant, and provide examples in Appendix F:⁸²

- 1) Potential measures to reduce wasteful, inefficient and unnecessary consumption of energy during construction, operation, maintenance and/or removal. The discussion should explain why certain measures were incorporated in the project and why other measures were dismissed.
- 2) The potential of siting, orientation, and design to minimize energy consumption, including transportation energy, increase water conservation and reduce solid waste.
- 3) The potential for reducing peak energy demand.
- 4) Alternate fuels (particularly renewable ones) or energy systems.
- 5) Energy conservation which could result from recycling efforts.

Courts have rejected EIRs that fail to include adequate analysis investigation into energy conservation measures that might be available or appropriate for a project.⁸³ In *California Clean Energy Commission v. City of Woodland* ("CCEC"),⁸⁴ the Court of Appeal reviewed an EIR for a shopping center. The EIR concluded that, due to the proposed project's compliance with Title 24 guidelines and regulations,

⁸¹ Pub. Resources Code, § 21100(b)(3); *Tracy First v. City of Tracy* (2009) 177 Cal.App.4th 912, 930.

⁸² 14 Cal. Code Regs., § 15126.4(a)(1)(C) (stating "Energy conservation measures, as well as other appropriate mitigation measures, shall be discussed when relevant.").

⁸³ *Ukiah Citizens for Safety First v. City of Ukiah* (2016) 248 CA4th 256; *Spring Valley Lake Ass'n v. City of Victorville* (2016) 248 CA4th 91.

⁸⁴ (2014) 225 CA4th 173.

the project would be expected to have a less-than-significant impact regarding the wasteful, inefficient, or unnecessary consumption of energy. But the lead agency's EIR did not include discussion regarding the different renewable energy options that might be available or appropriate for the project. The Court held "the City's EIRs failed to comply with the requirements of Appendix F to the Guidelines by not discussing or analyzing renewable energy options."⁸⁵ The lead agency argued that compliance with the Building Code sufficed to address energy impact concerns for the project.⁸⁶ But the Court explained:

Although the Building Code addresses energy savings for components of a new commercial construction, it does not address many of the considerations required under Appendix F of the CEQA Guidelines... These considerations include whether a building should be constructed at all, how large it should be, where it should be located, whether it should incorporate renewable energy resources, or anything else external to the building's envelope. Here, a requirement that Gateway II comply with the Building Code does not, by itself, constitute an adequate assessment of mitigation measures that can be taken to address the energy impacts during construction and operation of the project.⁸⁷

Here, the SCEA fails to analyze whether onsite solar generation is feasible. The SCEA states that "the Project would include the provision of conduit that is appropriate for future photovoltaic and solar thermal collectors," and that CCR Title 24, Part 6, Section 110.10(b) through 110.10(d) requires a solar zone (which is a suitable place where solar panels can be installed at a future date).⁸⁸ But the SCEA does not disclose whether implementation of on-site solar facilities (i.e. solar panels) is presently technically or economically feasible. Nor does the SCEA disclose the extent to which implementation of solar facilities would reduce the Project's energy consumption. The SCEA also fails to disclose how much of the Project site could support onsite solar generation (i.e. the extent of the potential solar zone). This investigation is necessary to adequately evaluate the potential for increased energy efficiency and reduced waste, as required by CEQA Guidelines Appendix F.

The City may claim that the SCEA's statement that it would provide a solar zone in accordance with the City's Green Building Code constitutes an adequate analysis of onsite solar generation. The LA Green Building Code, in Section 4.211,

⁸⁵ *Id.* at 213.

⁸⁶ *Id.* at 210, 211.

⁸⁷ *CECC* (2014) 225 CA4th 173, 213.

⁸⁸ SCEA, pg. 5-61.

provides that buildings shall comply with Section 110.10(b-d) of the California Energy Code. Section 110.10(b) of the California Energy Code only requires the solar zone to be no less than 15 percent of the total roof area of the building excluding any skylight area. As in *CCEC*, these provisions of the Green Building Code “[do] not address many of the considerations required under Appendix F.”⁸⁹ These considerations include the technical and economic feasibility of installing solar facilities on the Project site, the potential size of the Project’s solar zone, and the potential magnitude of mitigation provided by installing solar facilities. To comply with CEQA Guidelines Appendix F, an SCEIR must be prepared to include this discussion.

In addition to failing to adequately discuss onsite energy generation, the SCEA does not analyze the feasibility of measures reducing operational natural gas use. These include building electrification measures, such as replacing gas stoves with electric stoves. The City might contend that compliance with the Green Building Code adequately addresses operational natural gas use, but the Green Building Code does not address operational natural gas use by mixed-use buildings like the Project.⁹⁰ Specifically, the Green Building Code’s “Residential Mandatory Measures” do not include a requirement to replace natural gas connections with electric ones.⁹¹ An SCEIR must be prepared to adequately analyze natural gas consumption and mitigation, as required by CEQA Guidelines Appendix F.

The SCEA’s discussion of energy conservation measures also violates CEQA Guidelines Appendix F in regards to offroad equipment used in the construction and operation of the Project. As discussed earlier, the SCEA does not propose or evaluate the feasibility of electric or low-emission equipment during construction. Nor does the Project propose or evaluate the feasibility of utilizing existing power sources (e.g., power poles) or clean fuel generators rather than temporary power generators. During operations, the Project does not prohibit or consider the feasibility of prohibiting gas-powered landscape maintenance equipment. And the SCEA does not include other discussion of electric/low-emitting equipment. Therefore, an SCEIR must be prepared.

The SCEA’s failure to adequately analyze onsite energy generation or measures to reduce natural gas use is inconsistent with local policy. The LA Green New Deal sets forth the goal: “All new buildings will be net zero carbon by 2030;

⁸⁹ *CECC* (2014) 225 CA4th 173, 213.

⁹⁰ Los Angeles Green Building Code, Chapter 4 (“Residential Mandatory Measures”).

⁹¹ *Id.*

and 100% of buildings will be net zero carbon by 2050.”⁹² The SCEA’s lack of analysis regarding strategies to reduce energy consumption conflicts with this goal.

The City of Los Angeles General Plan’s Air Quality Element sets forth, in Goal 5: “Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels, and the implementation of conservation measures including passive methods such as site orientation and tree planting.” The Project is inconsistent with this goal because it does not adequately analyze the use of renewable resources and less-polluting fuels. The SCEA lacks analysis of passive methods such as site orientation and tree planting, which are called for in Appendix F (which requires analysis of “[t]he potential of siting, orientation, and design to minimize energy consumption, including transportation energy, increase water conservation and reduce solid waste”).

Similarly, in PMM GHG-1, the 2020-2045 RTP/SCS provides: “Incorporate design measures to reduce energy consumption and increase use of renewable energy.”⁹³ As explained above, the SCEA lacks the analysis and mitigation promoted in this measure.

C. The SCEA Fails to Adequately Analyze and Mitigate Potentially Significant Noise Impacts

a. The SCEA Fails to Properly Establish Baseline Noise Levels

The SCEA fails to properly establish the baseline noise level by only measuring noise at two locations. “Noise measurements were obtained at two locations near the Project Site to aid in the characterization of daytime ambient noise conditions surrounding the Project Site and nearby sensitive receptors.”⁹⁴ The two locations are along La Cienega Boulevard.⁹⁵ Ms. Levins explains that no information is provided regarding the time of day the measurements were taken or the length of the measurements.

Additionally, Ms. Levins observes that no measurements were taken on S. Alfred Street, where there are numerous residential receptors abutting the Project site. Ms. Levins explains that noise levels on S. Alfred Street could be as much as 10 dB lower than on La Cienega Blvd. due distance from La Cienega, lower traffic

⁹² SCEA, pg. 5-105.

⁹³ SCEA, pg. 4-39.

⁹⁴ SCEA, pg. 5-152.

⁹⁵ SCEA, pg. 5-152; Appendix B-2.

volume on S. Alfred Street, and shielding from La Cienega provided by existing structure.⁹⁶ Instead, the City estimates the existing ambient noise level at the Alfred street residences.⁹⁷

CEQA requires that a lead agency include a description of the physical environmental conditions in the vicinity of the Project as they exist at the time environmental review commences.⁹⁸ The description of the environmental setting constitutes the baseline physical conditions by which a lead agency may assess the significance of a project's impacts.⁹⁹ Use of the proper baseline is critical to a meaningful assessment of a project's environmental impacts.¹⁰⁰ Baseline information on which a lead agency relies must be supported by substantial evidence.¹⁰¹ The CEQA Guidelines define "substantial evidence" as "enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion."¹⁰² "Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts ... [U]nsubstantiated opinion or narrative [and] evidence which is clearly inaccurate or erroneous ... is not substantial evidence."¹⁰³

Here, the SCEA fails to properly establish the baseline noise for two reasons. By failing to provide information regarding the time of day the measurements were taken or the length of the measurements, the accuracy of the City's noise baseline cannot be ascertained. As a result, the City relies on a baseline unsupported by substantial evidence, in violation of CEQA.

Second, the City's failure to measure existing noise levels at S. Alfred Street residences is also not supported by substantial evidence. No justification is provided why noise measurements were not taken at these residences, which are the nearest to the Project site. The SCEA's noise study also does not explain how it arrived at its estimated existing noise level for the S. Alfred Street residence. This approach

⁹⁶ Levins Comments, pg. 1.

⁹⁷ SCEA, pg. 5-158.

⁹⁸ CEQA Guidelines, § 15125, subd. (a).

⁹⁹ *Id.*

¹⁰⁰ *Communities for a Better Environment v. South Coast Air Quality Management District* (2010) 48 Ca.4th 310, 320.

¹⁰¹ *Id.* at 321 (stating "an agency enjoys the discretion to decide [...] exactly how the existing physical conditions without the project can most realistically be measured, subject to review, as with all CEQA factual determinations, for support by substantial evidence"); see *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 435.

¹⁰² CEQA Guidelines §15384.

¹⁰³ Pub. Resources Code § 21082.2(c).

does not constitute substantial evidence, as the City's estimate is not supported by facts. Further, facts suggest that the City's estimate may overestimate existing noise levels. As stated in Ms. Levins' comments, "[n]oise levels on S. Alfred Street could be as much as 10 dB lower than on La Cienega Blvd. due distance from La Cienega, lower traffic volume on S. Alfred Street, and shielding from La Cienega provided by existing structure."¹⁰⁴ An SCEIR must be prepared to provide accurate ambient noise levels for the S. Alfred Street residences.

b. The SCEA Fails to Analyze Potentially Significant Construction Noise Impacts on All Sensitive Receptors

The SCEA fails to analyze potentially significant construction noise impacts on the upper floors of neighboring residences. The Project site is surrounded by sensitive receptors in multi-story residences. East adjacent to the Site are several 2-story residential duplex buildings (1017-1077 Alfred Street).¹⁰⁵ West across La Cienega Boulevard is a 3-story religious building (1039 La Cienega Boulevard) that houses Temple Beth Am, a 4-story education center (1055 La Cienega Boulevard) that houses the Pressman Education Center and Academy, and a 4-story residential building (1071 La Cienega Boulevard) that houses the Beverly Park Senior Apartments.¹⁰⁶

The SCEA's construction noise analysis only considers the grading phase, with work occurring at or below grade level. Ms. Levins explains that during the grading phase, the Project's noise impacts are most attenuated by sound barriers.¹⁰⁷ The SCEA requires implementation of sound barriers during construction in mitigation measures NOI-1 and NOI-3.¹⁰⁸ But Ms. Levins states that in order for sound barriers to be effective, they must block the line of sight between the source and the receiver.¹⁰⁹ As the Project's 28-story tower is erected, construction work would occur above the height of the proposed barriers.¹¹⁰ There would be a direct line of sight to sensitive receptors. Ms. Levins observes that no calculations are presented for these phases of work and there is no evidence provided to show the sound level would be below the 75 dBA criteria.

¹⁰⁴ Levins Comments, pg. 1.

¹⁰⁵ SCEA, pg. 2-2.

¹⁰⁶ *Id.*

¹⁰⁷ Levins Comments, pg. 1-2.

¹⁰⁸ SCEA, pg. 4-61.

¹⁰⁹ Levins Comments, pg. 2.

¹¹⁰ *Id.*

In sum, the City’s approach violates CEQA for several reasons. The SCEA fails to analyze potentially significant impacts on upper story residences. The SCEA fails to disclose the impacts of all phases of construction, which have different impacts. The SCEA’s finding that construction noise impacts would be less than significant is not supported by substantial evidence. The mitigation (MM NOI-1 and NOI-3) the City concludes is sufficient to reduce construction to a less-than-significant level is ineffective. An SCEIR must be prepared containing analysis of the tower-construction phase’s noise impacts, and mitigation must be formulated to mitigate the potentially significant impacts that are detected.

c. The SCEA Does Not Identify All Mechanical Systems Reasonably Required for the Project.

The SCEA does not identify all mechanical systems reasonably required for the Project. The SCEA’s discussion of the Project’s operational noise from mechanical equipment states that noise may be generated by the Project’s HVAC system, and its filtering and pumping equipment for the proposed pools and other water features.¹¹¹ Ms. Levins explains that this type of project typically includes additional equipment: an emergency generator, garage exhaust fans, and air handling units.¹¹² She further states that an emergency generator could generate a sound level of 71 dBA at a distance of 50 ft. This impact would exceed the City’s significance threshold, requiring mitigation.¹¹³

Courts have explained that a complete description of a project must “address not only the immediate environmental consequences of going forward with the project, but also all “*reasonably foreseeable* consequence[s] of the initial project.”¹¹⁴ “If a[n]...EIR...does not adequately apprise all interested parties of the true scope of the project for intelligent weighing of the environmental consequences of the project, informed decision-making cannot occur under CEQA and the final EIR is inadequate as a matter of law.”¹¹⁵

Here, the SCEA may be omitting disclosure and analysis of equipment reasonably expected for the Project’s operations. As a result, the full extent of the Project’s operational noise impacts – which potentially exceed significance

¹¹¹ SCEA, pg. 5-162, 163.

¹¹² Levins Comments, pg. 2.

¹¹³ *Id.*

¹¹⁴ *Laurel Heights I*, 47 Cal. 3d 376, 398 (emphasis added); see also *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal. 4th 412, 449-50.

¹¹⁵ *Riverwatch v. Olivenhain Municipal Water Dist.* (2009) 170 Cal. App. 4th 1186, 1201.

thresholds – are not adequately evaluated and mitigated. An SCEIR must be prepared to resolve this issue with the SCEA’s project description, impacts analysis, and mitigation.

d. The SCEA Does Not Adequately Evaluate Operational Noise Impacts from Mechanical Systems

As previously stated, the SCEA’s discussion of the Project’s operational noise from mechanical equipment states that noise may be generated by the Project’s HVAC system, and its filtering and pumping equipment for the proposed pools and other water features.¹¹⁶ The SCEA concludes noise impacts from these sources would not increase ambient noise levels at nearby receptors. But this conclusion is not supported by quantitative analysis. The City’s approach is inconsistent with CEQA, as courts have held that the lead agency’s significance determination with regard to each impact must be supported by accurate scientific and factual data.¹¹⁷

e. The SCEA Fails to Adequately Evaluate Operational Noise Impacts from Recreation Areas.

The SCEA claims that noise impacts from the Project’s roof deck, balconies, and shared amenity areas would result in less-than-significant impacts.¹¹⁸ The SCEA reasons:

The primary source of noise associated with the Project’s balconies and shared amenity areas would be speech/conversation from Project users. Vocal noise from speech and conversation averages between 55 and 67 dBA at a reference distance of one meter, in proportion to background noise levels. Given the rapid attenuation of speech/conversation and the Project’s elevated surrounding ambient noise levels, it is unlikely that vocal noises from outdoor uses would be audible at nearby sensitive receptors, let alone capable of causing or contributing to significant noise increases.¹¹⁹

Ms. Levins explains that the City’s analysis is unrealistic because it only considers the noise generated by a single person talking.¹²⁰ It is more realistic to assume multiple occupants speaking at the same time. Further, it is reasonable to

¹¹⁶ SCEA, pg. 5-162, 163.

¹¹⁷ 14 CCR § 15064(b).

¹¹⁸ SCEA, pg. 5-163.

¹¹⁹ *Id.*

¹²⁰ Levins Comments, pg. 3.

assume the Project's open spaces could be used for parties and gatherings, with many people talking at once. It is also reasonable to assume that music may be played in these spaces. It is also reasonable to assume open spaces would be used in the evening and at night, when there are lower ambient sound levels.¹²¹ In sum, the actual noise impacts from the Project's open spaces are far greater than disclosed in the SCEA. An SCEIR must be prepared to analyze the reasonable use of these spaces.

Ms. Levins demonstrates that impacts from reasonable use of the Project's open spaces are potentially significant:

Excluding the effect of background music and shielding, 25 voices in "normal" conversation would generate 59 dBA at a distance of 30 ft. However, the existing ambient sound levels are elevated and may cause people to speak louder to be heard over traffic noise. With 25 "raised" voices, the resulting sound level would be approximately 65 dBA at a distance of 30 ft, and a sound level of 72 dBA would be generated by 5 people shouting.¹²²

The impacts in Ms. Levins' analysis would likely exceed the 3 dba threshold set out in the SCEA.¹²³ The increase in noise may be especially significant because ambient noise levels are typically reduced in the evening.¹²⁴

f. The City's Operational Noise Significance Thresholds Are Not Supported by Substantial Evidence

The Project's operational noise significance thresholds are not supported by substantial evidence because they do not reflect sleep disturbance impacts. The Project includes several sources of potential sleep-disturbing operational noise impacts: the balconies and rooftop area; mechanical equipment including an HVAC; and roadway traffic noise. Yet the Project is surrounded by residential uses. Compliance with the SCEA's significance thresholds for these noise impacts does not constitute substantial evidence that sleep disturbance impacts are less-than-significant.

¹²¹ *Id.*

¹²² *Id.*

¹²³ SCEA, pg. 5-162.

¹²⁴ Levins Comments, pg. 3.

Courts have held that compliance with noise regulations alone is not substantial evidence of a less-than-significant impact.¹²⁵ In *Oro Fino Gold Mining Corp. v. County of El Dorado* (“*Oro Fino*”),¹²⁶ a mining company applied for a special use permit for drilling holes to explore for minerals.¹²⁷ The mining company argued the proposed mitigated negative declaration prohibited noise levels above the applicable county general plan noise standard maximum of 50 dBA and, therefore, there could be no significant noise impact. The court rejected this argument: “we note that conformity with a general plan does not insulate a project from EIR review where it can be fairly argued that the project will generate significant environmental effects.”¹²⁸ Thus, the court concluded an EIR was required.

In *Citizens for Responsible & Open Government v. City of Grand Terrace* (“*Grand Terrace*”),¹²⁹ the city approved a 120-unit senior housing facility based on a mitigated negative declaration.¹³⁰ The noise element of the city’s general plan stated exterior noise levels in residential areas should be limited to 65 dB CNEL.¹³¹ The initial study concluded the facility’s air conditioner units would cause noise impacts, but with mitigating measures the project would operate within the general plan’s noise standard. But the court cited *Oro Fino* for the principle that “conformity with a general plan does not insulate a project from EIR review where it can be fairly argued that the project will generate significant environmental effects.”¹³² A citizen’s group provided substantial evidence supporting such a fair argument. This evidence included testimony from an individual in the HVAC industry that the type of air conditioning units proposed by the project “sound like airplanes.”¹³³ And at a city council public hearing, community and city council members expressed concern that the air conditioners would be noisy.¹³⁴ The court considered the testimony about the noise generated by the proposed air

¹²⁵ *King & Gardiner Farms, LLC v. Cnty. of Kern* (2020) 45 Cal.App.5th 814, 865.

¹²⁶ (1990) 225 Cal.App.3d 872.

¹²⁷ *Id.* at pg. 876; see also *Keep our Mountains Quiet v. County of Santa Clara* (2015) 236 Cal.App.4th 714; *Citizens for Responsible & Open Government v. City of Grand Terrace* (2008) 160 Cal.App.4th 1323, 1338; *Gentry v. City of Murrieta* (1995) 36 Cal.App.4th 1359, 1416 (project’s effects can be significant even if “they are not greater than those deemed acceptable in a general plan”); *Environmental Planning & Information Council v. County of El Dorado* (1982) 131 Cal.App.3d 350, 354, (“CEQA nowhere calls for evaluation of the impacts of a proposed project on an existing general plan”).

¹²⁸ *Id.* at pp. 881–882.

¹²⁹ (2008) 160 Cal.App.4th 1323.

¹³⁰ *Id.* at 1327.

¹³¹ *Grand Terrace*, 160 Cal.App.4th at 1338.

¹³² *Grand Terrace*, *supra*, at pg. 1338.

¹³³ *Id.* at 1338-1339.

¹³⁴ *Id.* at 1338.

conditioners, took into account the mitigation measures, and concluded “there is substantial evidence that it can be fairly argued that the Project may have a significant environmental noise impact.”¹³⁵

Here, the SCEA states that operational noise would be less-than-significant if it would be less than 3 dBA.¹³⁶ The SCEA also states that impacts would be less-than-significant because LAMC Section 112.02 prohibits noise from mechanical equipment, including HVACs, from exceeding 5 decibels at receptors.¹³⁷

These significance thresholds do not address the Project’s potential for sleep disturbance at nearby residential receptors. The World Health Organization (“WHO”) identifies a guidance of 45 dBA Leq (outdoors) to avoid sleep disturbance from a continuous source, and a limit of 60 dBA Lmax for intermittent sources.¹³⁸ The significance thresholds summarized above do not necessarily consider noise impacts at WHO levels significant, nor otherwise address potential sleep disturbance impacts. Further, the City’s significance thresholds do not identify the unique impacts of sound systems/speakers on sleep: low frequency bass notes can cause significant impacts even when the A-weighted level complies with applicable code. This occurs because low frequency bass notes pass through exterior walls and closed windows with little reduction.¹³⁹

The Project has potentially significant sleep disturbance impacts on nearby residential receptors. The Project includes 54,540 square feet of open space on several decks, the roof and in private balconies.¹⁴⁰ Noise would potentially be generated by people that are accommodated on the roof deck. Noise would also potentially be generated by speakers on the roof deck or other open spaces – there is no condition in the SCEA precluding use of speakers. Thus, there is the potential for low-frequency bass notes to disturb sleep. Ms. Levin presents calculations demonstrating that music played from the Project’s terraces could exceed the WHO guideline of 60 dBA to avoid sleep disturbance excessive noise. Thus, noise from the Project’s rooftop and open spaces occurring between 10 PM and 7 AM could cause sleep disturbance and would be potentially significant.

¹³⁵ *Id.* at p. 1341.

¹³⁶ SCEA, pg. 5-162.

¹³⁷ SCEA, pg. 5-162.

¹³⁸ Levins Comments, pg. 3.

¹³⁹ *Id.*

¹⁴⁰ SCEA, pg. 2-13.

In sum, the City's operational noise thresholds do not account for the Project's potential sleep disturbance impacts. Meanwhile, substantial evidence shows that noise impacts on sleep are potentially significant. An SCEIR must be prepared to analyze and mitigate this impact.

D. The SCEA Fails to Disclose and Mitigate the Project's Significant Hazards Impacts

a. The SCEA Fails to Identify Adequate Mitigation for the Project's Significant Hazards Impacts

EIRs and SCEAs must mitigate significant impacts through measures that are "fully enforceable through permit conditions, agreements, or other legally binding instruments."¹⁴¹ Here, the SCEA fails to adopt mitigation necessary to mitigate impacts from transport of hazardous materials. The SCEA claims that adoption of PMM HAZ-3 is inapplicable.¹⁴² PMM HAZ-3 provides: "[w]here the construction and operation of projects involves the transport of hazardous materials, avoid transport of such materials within one-quarter mile of schools, when school is in session, wherever feasible."¹⁴³ The City reasons, "[t]he Project does not include the shipment of flammable liquids and other hazardous materials and does not include any rail transportation... Thus, incorporation of this mitigation measure is not required."¹⁴⁴ But the City's conclusion is not supported by substantial evidence.

The Project's Phase II Environmental Site Assessment ("Phase II ESA") identified significant levels of soil contamination. Soil sampling conducted in undocumented fill materials throughout the Site detected lead, chromium, and concentrations of Total Petroleum Hydrocarbons ("TPH") exceeding residential screening levels.¹⁴⁵ The Phase II ESA also identified impacts to soil, soil vapor, and groundwater from the upgradient automotive service station in the northern margin and western margin of the site.¹⁴⁶ The SCEA states that with implementation of the MM HAZ-1, Project impacts related to risk of upset would be less than significant.¹⁴⁷ MM HAZ-1 provides, in part, that all contaminated soil would be

¹⁴¹ CEQA Guidelines, § 15126.4, subd. (a)(2).

¹⁴² SCEA, pg. 4-47.

¹⁴³ SCEA, pg. 4-48.

¹⁴⁴ *Id.*

¹⁴⁵ SCEA, pg. 5-113.

¹⁴⁶ SCEA, pg. 5-113.

¹⁴⁷ SCEA, pg. 5-114.

segregated and removed from the site to an approved treatment/disposal facility.¹⁴⁸ Since the Project acknowledges, in its adoption of PMM HAZ-1, that it would require transport of contaminated soil and toxics from the Project site, the Project creates potential impacts due to transport of hazardous materials.

The Project's transport of contaminants from the Project requires adoption of the 2020-2045 RTP/SCS's PMM HAZ-3, which provides: "[w]here the construction and operation of projects involves the transport of hazardous materials, avoid transport of such materials within one-quarter mile of schools, when school is in session, wherever feasible."¹⁴⁹ Here, the Project involves transport of hazardous materials. Exposure to TPH can cause health impacts such as fatigue, headache, nausea, and drowsiness, nerve disorders, peripheral neuropathy, and death.¹⁵⁰ Exposure to Chromium or Lead can cause various respiratory, cardiovascular, gastrointestinal, immunological, reproductive effects, etc.¹⁵¹ Transport of these contaminants, among others, would occur within one-quarter mile of schools. These schools include Pressman Education Center and Academy, located at 1055 La Cienega Boulevard, 90 feet west of the site, and St. Mary Magdalen Catholic School, located at 1223 Corning Street, 1,320 feet southwest of the site.¹⁵² Transport of contaminants removed from the Project site is thus a potentially-significant health risk that requires adoption of PMM HAZ-3. An SCEIR must be prepared to resolve this currently unmitigated impact.

b. The SCEA Fails to Disclose Health Effects Due to Soil Contamination

The City fails to correlate the impacts from the Project's potential soil contamination impacts with the adverse health effects on workers, future residents, and surrounding community.

The court in *Bakersfield Citizens for Local Control* held that to properly analyze an impact, it must be correlated with the adverse health effects it

¹⁴⁸ SCEA, pg. 5-116.

¹⁴⁹ SCEA, pg. 4-48.

¹⁵⁰ Agency for Toxic Substances and Disease Registry ("ATSDR"), Public Health Statement for TPH, (September 1999), <https://www.atsdr.cdc.gov/ToxProfiles/tp123-c1-b.pdf>; ATSDR, Toxicological Profile for Total Petroleum Hydrocarbons, <https://www.atsdr.cdc.gov/TSP/ToxProfiles/ToxProfiles.aspx?id=424&tid=75>.

¹⁵¹ ATSDR, Toxicological Profile for Chromium, (September 2012), <https://www.atsdr.cdc.gov/toxprofiles/tp7.pdf>; ATSDR, Toxicological Profile for Lead, (August 2020), <https://www.atsdr.cdc.gov/toxprofiles/tp13.pdf>.

¹⁵² SCEA, pg. 5-117.

creates.¹⁵³ The court in *Bakersfield* reviewed EIRs that showed that two projects would have significant and unavoidable adverse impacts on air quality. However, these projects failed to disclose the health consequences that necessarily result from the identified adverse air quality impacts:

Buried in the description of some of the various substances that make up the soup known as “air pollution” are brief references to respiratory illnesses. However, there is no acknowledgement or analysis of the well-known connection between reduction in air quality and increases in specific respiratory conditions and illnesses. After reading the EIR's, the public would have no idea of the health consequences that result when more pollutants are added to a nonattainment basin. On remand, the health impacts resulting from the adverse air quality impacts must be identified and analyzed in the new EIR's.¹⁵⁴

Here, the SCEA acknowledges that the Project has a risk of disturbing soil contaminants, including lead, chromium, and TPH. But the SCEA does not correlate these risks to the health consequences of exposure to these contaminants. As in *Bakersfield*, there may be brief references to health risks associated with exposure to contaminants on the Project site in the SCEA's Appendix F, which contains 6,430 pages relating to the Environmental Site Assessments prepared for the Project. But as in *Bakersfield*, any information that may be in this Appendix is scattered and inaccessible.¹⁵⁵ Further, these brief, general references to health effects of certain contaminants do not educate the public regarding the particular impacts of this Project on this particular community. An SCEIR must be prepared the specific health consequences of this Project's activities.

VII. CONCLUSION

The Project would result in potentially significant impacts to public health from TACs and hazards, which were not adequately analyzed and mitigated to less than significant levels. The Project also failed to adequately analyze and mitigate impacts to energy and noise. Moreover, the SCEA violates CEQA by failing to adequately explain the significance of impacts on people and the environment.

¹⁵³ *Bakersfield Citizens for Local Control v. City of Bakersfield* (“*Bakersfield*”) (2004) 124 Cal.App.4th 1184.

¹⁵⁴ *Bakersfield Citizens for Local Control* 124 Cal.App.4th 1184.

¹⁵⁵ See SCEA, Appendix F, pg. 2342 (a non-project-specific document discussing lead hazards).

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For the foregoing reasons, we respectfully request that the City of Los Angeles reject the SCEA and deny the Project Approvals, until the City prepares and circulates the public a Draft SCEIR, as required by CEQA, and modifies the Project to be consistent with all laws, regulations and policies.

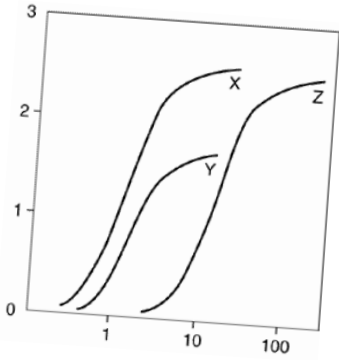
Sincerely,



Aidan P. Marshall

Attachments
APM:acp

EXHIBIT A



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October 20, 2022

Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080

Attn: Mr. Aidan Marshall

Subject: Comments On Sustainable Communities Environmental Assessment (SCEA) For The 1050 La Cienega Boulevard Project, Los Angeles, CA 90035 Case Number: ENV-2022-2280-SCEA

Dear Mr. Marshall:

At the request of Adams Broadwell Joseph & Cardozo (ABJC), Clark and Associates (Clark) has reviewed materials related to the 2022 City of Los Angeles' (the City's) Sustainable Communities Environmental Assessment (SCEA) of the above referenced project.

Clark's review of the materials in no way constitutes a validation of the conclusions or materials contained within the plan. If we do not comment on a specific item this does not constitute acceptance of the item.

Project Description:

According to the City, The Project would construct a mixed-use development with 290 residential units (36 studio units, 158 1-bedroom units, and 96 2-bedroom units) and 7,500 square feet of restaurant commercial use in a 28-story, 297,690-square-foot building. The Project would include a total of 426 vehicle parking spaces, 184 bicycle parking spaces (164 long term and 20 short term), and 54,540 square feet of open space, as well as an approximately 4,500 square-foot publicly accessible pocket park located at the northern portion of the Project Site.

The Project Site is located on the east side of La Cienega Boulevard, between Olympic Boulevard and Whitworth Drive. The Site consists of 10 parcels zoned C2-1-O, located in the Wilshire Community Plan area of the City of Los Angeles (City). The City of Beverly Hills is located north of Olympic Boulevard, 300 feet north of the Site.



Figure 1: Proposed Project Site Plan

The Project Site contains a two- to three-story, 33,057 square-foot commercial building (Roseberry Building) and approximately 15,119 square foot surface parking lot with 64 automobile parking spaces. The building would be retained and the parking lot would be redeveloped.

The Project Site is located in the Wilshire Community Plan area of the City of Los Angeles.

The area surrounding the project site includes:

- A 1-story commercial building (1016-1018 La Cienega Boulevard) to the north of the Site, that houses an auto repair facility (Matrix Collision Repair Facility). This area is zoned C2-1-O.
- To the south there is an adjacent to the Site is a 3-story commercial building (1080 La Cienega Boulevard) that houses a variety of retail, restaurant, and acupuncture clinics. This area is zoned C2-1-O.
- To the west of the Site, across La Cienega Boulevard, are a variety of uses listed below (from north to south). This area is zoned C2-1-O.
 - Surface parking lot (1019-1029 La Cienega Boulevard)
 - 3-story religious building (1039 La Cienega Boulevard) that houses Temple Beth Am
 - 4-story education center (1055 La Cienega Boulevard) that houses the Pressman Education Center and Academy
 - 4-story residential building (1071 La Cienega Boulevard) that houses the Beverly Park Senior Apartments.
- To the east of the Site, there are several 2-story residential duplex buildings (1017-1077 Alfred Street). This area is zoned R2-1-O-HPOZ.
- The school closest to the Site is Pressman Education Center and Academy, affiliated with Temple Beth Am, located at 1055 La Cienega Boulevard, 90 feet west of the Site.

There are potentially significant air quality and public health impacts that are not addressed in the City’s analysis that must be addressed in an environmental impact report (“EIR”)

Specific Comments:

- 1. The Health Risk Analysis (HRA) Presented In The SCEA Inaccurately Assumes That An Age Sensitivity Factor (ASF), Accounting For The Mutagenicity of Diesel Particulate, Is Not Included In The HRA Resulting In An Underestimation of The Risks From Diesel Particulate Matter (DPM)**

In Construction Health Risk Assessment to the SCEA,¹ Air Quality Dynamics, a consultant for the Proponent, states that based on their review of “available guidance” on the use of early life exposure adjustments (age sensitivity factors or ASFs) to identified carcinogens, the use of ASFs was not applicable since neither the Lead Agency nor SCAQMD have developed recommendations on whether ASFs should be used for CEQA analyses of potential DPM construction impacts. The text of the HRA also states that it relied on U.S. EPA guidance² related to early life exposure adjust factors whereby the adjustment factors are only considered when carcinogens act “through the mutagenic mode of action”.³ The HRA goes to state that “As presented in the technical memorandum, numerous compounds were identified as having a mutagenic mode of action. For diesel particulates, polycyclic aromatic hydrocarbons (PAHs) and their derivatives, which are known to exhibit a mutagenic mode of action, comprise < 1% of the exhaust particulate mass. To date, the U.S. Environmental Protection Agency reports that whole diesel engine exhaust has not been shown to elicit a mutagenic mode of action (USEPA, 2018).”

The analysis that the use of the ASFs is not inconsistent with the guidance from the City and the record from the State of California regarding the health effects of exposure to diesel exhaust. According to the City of Los Angeles’s Air Quality And Health Effects guidance,⁴ exposure to DPM may be a health hazard, particularly to *children* (emphasis added) whose lungs are still developing and the elderly who may have other serious health problems. This statement from the City’s guidance

¹ Air Quality Dynamics. 2022. 1050 La Cienega Boulevard Project – Construction Health Risk Assessment. Dated August 8, 2022. Page 182-183 of 639 of Appendices A-E.

² U.S. EPA. 2006. Memorandum – Implementation of the Cancer Guidelines and Accompanying Supplemental Guidance – Science Policy Council Cancer Guidelines Implementation Workgroup Communication II: Performing Risk Assessments That Include Carcinogens Described in the Supplemental Guidance as having a Mutagenic Mode of Action.

³ Air Quality Dynamics. 2022. 1050 La Cienega Boulevard Project – Construction Health Risk Assessment. Dated August 8, 2022. Page 182-183 of 639 of Appendices A-E.

⁴ City of Los Angeles, Department of City Planning. 2019. Air Quality And Health Effects. Pg 10

clearly indicates that the City is aware that age of exposure to DPM has a significant impact on the potential health outcomes.

The guidance goes on to state that “potential TAC (toxic air contaminant) impacts are evaluated by conducting a qualitative analysis consistent with CARB and SCAQMD guidance, and may be followed by a *more detailed analysis* utilizing CARB’s Hotspots Analysis and Reporting Program (HARP) model where the project results in a substantial source of TACs or if a project would site sensitive land uses in proximity to TAC sources.”⁵ According to CARB, “HARP can be used by the air pollution control and air quality management districts (districts), facility operators and other organizations or individuals to promote statewide consistency, efficiency and cost-effective development of facility emission inventories and conducting health risk assessments. HARP can also be used for conducting health risk assessments used in other programs (e.g., facility permitting, *CEQA reviews*).”^{6,7}

The City’s statement in the guidance clearly indicates that the use of the HARP model (without restrictions) and its algorithms which incorporate the use of ASFs for carcinogens, to derive project specific health risks is appropriate. The guidance goes on to states that the HARP model has become an accepted industry standard in evaluating health impacts from TACs and providing reliable and meaningful analysis.⁸

⁵ City of Los Angeles, Department of City Planning. 2019. Air Quality And Health Effects. Pg 10

⁶ CARB. 2022. Hot Spots Analysis & Reporting Program: About. <https://ww2.arb.ca.gov/our-work/programs/hot-spots-analysis-reporting-program/about>

⁷ CARB and CAPCOA. 2015. Risk Management Guidance For Stationary Sources of Air Toxics. Pg 40. https://ww2.arb.ca.gov/sites/default/files/classic/toxics/rma/rmgssat.pdf?_ga=2.71249616.1384737318.1660245722-1818700787.1659738080

⁸ City of Los Angeles, Department of City Planning. 2019. Air Quality And Health Effects. Pg 36

Furthermore, the HRA misstates the State of California’s guidance on the health impacts of diesel exhaust. In its 1998 Report On Diesel Exhaust,⁹ the Scientific Review Panel (SRP) staffed by members of the California Air Resources Board (CARB) and the Office of Environmental Health Hazard Assessment (OEHHA) explicitly states that “Diesel exhaust contains genotoxic compounds in both the vapor phase and the particle phase. Diesel exhaust particles or extracts of diesel exhaust particles are *mutagenic* (emphasis added) in bacteria and in *mammalian cell systems*, and *can induce chromosomal aberrations, aneuploidy, and sister chromatid exchange in rodents and in human cells in vitro*. Diesel exhaust particles induced unscheduled DNA synthesis in vitro in mammalian cells”

It is clear from the line of evidence above that the use of ASFs in the health analysis of risks from TACs associated with the Project is appropriate and necessary. The City must re-evaluate the risk using the ASFs in the calculation of the risks to the residents nearby.

2. Using the ASFs It Is Clear That The Risks From Exposure To DPM From Construction And Operation of the Project Exceed The 10 In 1,000,000 Threshold.

As note above in Comment 2 the City of Los Angeles’s Air Quality And Health Effects guidance,¹⁰ states that exposure to DPM may be a health hazard, particularly to *children* (emphasis added) whose lungs are still developing and the elderly who may have other serious health problems. The City’s guidance clearly indicates that the exposure of sensitive populations, e.g., young children, should be evaluated in the HRA for the Project emissions.

⁹ CARB. 2022. Findings of the Scientific Review Panel on The Report On Diesel Exhaust as adopted at the Panel’s April 22, 1998, Meeting. Site reviewed August 11, 2022. <https://ww2.arb.ca.gov/sites/default/files/classic/toxics/dieseltac/de-fnds.pdf>

¹⁰ City of Los Angeles, Department of City Planning. 2019. Air Quality And Health Effects. Pg 10

Using the results of the City’s dispersion model of DPM on a residential receptor it is clear that the cumulative risks will exceed the 10 in 1,000,000 threshold for the construction phase of the Project. Taking the DPM concentrations (0.38922 micrograms per cubic meter (ug/m³)) from Tables A1 of the HRA, I have recalculated the risks to be consistent with the guidance.

Table A1
Quantification of Carcinogenic Risks and Noncarcinogenic Hazard
South Alfred Street / Maximum Exposed Residential Receptor (Thrid Trimester)

Source (a)	Mass GLC		Weight Fraction (d)	Contaminant (e)	Carcinogenic Risk				Noncarcinogenic Hazard		
	(ug/m ³) (b)	(mg/m ³) (c)			URF (ug/m ³) ⁻¹ (f)	CPF (mg/kg/day) ⁻¹ (g)	DOSE (mg/kg-day) (h)	RISK (i)	REL (ug/m ³) (j)	RID (mg/kg/day) (k)	RESP (l)
On-Site Exhaust	0.38922	3.89E-04	1.00E+00	Diesel Particulate	3.0E-04	1.1E+00	1.0E-04	3.2E-07	5.0E+00	1.4E-03	7.8E-02
TOTAL								3.2E-07	7.8E-02		

Note:

Exposure factors used to calculate contaminant intake

exposure frequency (days/year)	261
exposure duration (years)	0.25
inhalation rate (L/kg-day)	361
inhalation absorption factor	1
averaging time (years)	70
fraction of time at home	0.85

Using the modeled concentration of 0.38922 ug/m³ and an exposure duration of 2.61-years, starting the exposure for the receptor at the most sensitive age (children less than 2 years of age), the resulting risk to the receptor is 88 in 1,000,000 for the nearly three-year construction phase exposure.

The results of the analysis are presented as an exhibit to this letter.

Age Group	Risk	Age Sensitivity	FAH	ED	CPF	Dose Air	Cair	BR/BW	A	EF
3rd Trimester	3.36E-06	10	0.85	0.25	1.1	0.000100473	0.38922	361	1	0.715068
0<2	8.10E-05	10	0.85	2	1.1	0.000303368	0.38922	1090	1	0.715068
2<9	3.33E-06	3	0.72	0.41	1.1	0.000239633	0.38922	861	1	0.715068

In order for the construction scenario to reach a *de minimis* level of less than 10 in 1,000,000, the exposure concentration of DPM must not exceed 0.0442 ug/m³. The City must look at additional mitigation measures to reduce the concentration of DPM released during the construction phase.

The City's HRA of the impacts, as presented in the SCEA, do not accurately assessment the probable impacts over time. The City must revise its HRA, require additional mitigation measures during the construction operational phase, and present the results in an environmental impact report (EIR).

Conclusion

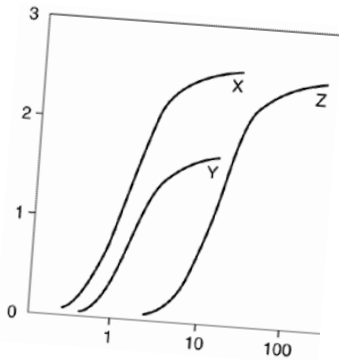
The facts identified and referenced in this comment letter lead me to reasonably conclude that the Project could result in significant unmitigated impacts if the SCE is approved. The City must re-evaluate the significant impacts identified in this letter by requiring the preparation of an EIR.

Sincerely,

A handwritten signature in black ink, appearing to read "J. J. Coe". The signature is written in a cursive style with a horizontal line extending to the left from the first letter.

EXHIBIT A

CV



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James J. J. Clark, Ph.D.

Principal Toxicologist

Toxicology/Exposure Assessment Modeling

Risk Assessment/Analysis/Dispersion Modeling

Education:

Ph.D., Environmental Health Science, University of California, 1995

M.S., Environmental Health Science, University of California, 1993

B.S., Biophysical and Biochemical Sciences, University of Houston, 1987

Professional Experience:

Dr. Clark is a well-recognized toxicologist, air modeler, and health scientist. He has 30 years of experience in researching the effects of environmental contaminants on human health including environmental fate and transport modeling (SCREEN3, AEROMOD, ISCST3, Johnson-Ettinger Vapor Intrusion Modeling, RESRAD, GENII); exposure assessment modeling (partitioning of contaminants in the environment as well as PBPK modeling); conducting and managing human health risk assessments for regulatory compliance and risk-based clean-up levels; and toxicological and medical literature research.

SELECTED AIR MODELING RESEARCH/PROJECTS

Client(s) - Confidential

Dr. Clark performed a historical dose reconstruction for community members from an active 700 acre petroleum refinery in Los Angeles. The analysis included a multi-year dispersion model was performed in general accordance with the methods outlined by the U.S. EPA and the SCAQMD for assessing the health impacts in Torrance, California. The results of the analysis are being used as the basis for injunctive relief for the communities surrounding the refinery.

Client(s) – Multiple

Indoor Air Evaluations, California: Performed multiple indoor air screening evaluations and risk characterizations consistent with California Environmental Protection Agency's (Cal/EPA) Department of Toxic Substances Control (DTSC) and Regional Water Quality Control Board (RWQCB) methodologies. Characterizations included the use of DTSC's

modified Johnson & Ettinger Model and USEPA models, as well as the attenuation factor model currently advocated by Cal/EPA's Office of Environmental Health and Hazard Assessment (OEHHA).

Client – Adams, Broadwell, Joseph Cardozo, P.C.

Dr. Clark has performed numerous air quality analyses and risk assessments of criteria pollutants, air toxins, and particulate matter emissions for sites undergoing evaluation via the California Environmental Quality Act (CEQA) process. The analyses include the evaluation of Initial Study (IS) and Environmental Impacts Reports (EIR) for each project to determine the significance of air quality, green house gas (GHG), and hazardous waste components of the projects. The analyses were compiled as comment letters for submittal to oversight agencies.

Client – Confidential

Dr. Clark performed a comprehensive evaluation of criteria pollutants, air toxins, and particulate matter emissions from a carbon black production facility to determine the impacts on the surrounding communities. The results of the dispersion model were used to estimate acute and chronic exposure concentrations to multiple contaminants and were be incorporated into a comprehensive risk evaluation.

Client – Confidential

Dr. Clark performed a comprehensive evaluation of air toxins and particulate matter emissions from a railroad tie manufacturing facility to determine the impacts on the surrounding communities. The results of the dispersion model have been used to estimate acute and chronic exposure concentrations to multiple contaminants and have been incorporated into a comprehensive risk evaluation.

PUBLIC HEALTH/TOXICOLOGY

Client: Confidential

Dr. Clark performed a historical dose reconstruction for community members from radiologically impacted material (RIM) releases from an adjacent landfill. The analysis was performed in general accordance with the methods outlined by the Agency for Toxic Substances Control (ATSDR) for assessing radiation doses from historical source areas in North St. Louis County, Missouri.

Client: City of Santa Clarita, Santa Clarita, California

Dr. Clark managed the oversight of the characterization, remediation and development activities of a former 1,000 acre munitions manufacturing facility for the City of Santa

Clarita. The site is impacted with a number of contaminants including perchlorate, unexploded ordinance, and volatile organic compounds (VOCs). The site is currently under a number of regulatory consent orders, including an Imminent and Substantial Endangerment Order. Dr. Clark assisted the impacted municipality with the development of remediation strategies, interaction with the responsible parties and stakeholders, as well as interfacing with the regulatory agency responsible for oversight of the site cleanup.

Client: Confidential

Dr. Clark performed a historical dose reconstruction for community members exposed to radioactive waste released into the environment from legacy storage facilities. The releases resulted in impacts to soils, sediments, surface waters, and groundwater in the vicinity of the sites. The analysis was performed in general accordance with the methods outlined by the Agency for Toxic Substances Control (ATSDR) for assessing radiation doses from historical source areas in the community.

Client: Confidential

Dr. Clark performed a dose assessment of an individual occupationally exposed to metals and silica from fly ash who later developed cancer. A review of the individual's medical and occupational history was performed to prepare opinions regarding his exposure and later development of cancer.

Client: Brayton Purcell, Novato, California

Dr. Clark performed a toxicological assessment of residents exposed to methyl-tertiary butyl ether (MTBE) from leaking underground storage tanks (LUSTs) adjacent to the subject property. The symptomology of residents and guests of the subject property were evaluated against the known outcomes in published literature to exposure to MTBE. The study found that residents had been exposed to MTBE in their drinking water; that concentrations of MTBE detected at the site were above regulatory guidelines; and, that the symptoms and outcomes expressed by residents and guests were consistent with symptoms and outcomes documented in published literature.

Client: Confidential

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to hexavalent chromium who later developed cancer. A review of the individual's medical and occupational history was performed to prepare opinions regarding her exposure and later development of cancer.

Client: Covanta Energy, Westwood, California

Evaluated health risk from metals in biosolids applied as soil amendment on agricultural lands. The biosolids were created at a forest waste cogeneration facility using 96% whole tree wood chips and 4 percent green waste. Mass loading calculations were used to estimate Cr(VI) concentrations in agricultural soils based on a maximum loading rate of 40 tons of biomass per acre of agricultural soil. The results of the study were used by the Regulatory agency to determine that the application of biosolids did not constitute a health risk to workers applying the biosolids or to residences near the agricultural lands.

Client: Kaiser Venture Incorporated, Fontana, California

Prepared PBPK assessment of lead risk of receptors at a 1,100-acre former steel mill. This evaluation was used as the basis for granting closure of the site by lead regulatory agency.

RISK ASSESSMENTS/REMEDIAL INVESTIGATIONS

Kaiser Ventures Incorporated, Fontana, California

Prepared health risk assessment of semi-volatile organic chemicals and metals for a fifty-year old wastewater treatment facility used at a 1,100-acre former steel mill. This evaluation was used as the basis for granting closure of the site by lead regulatory agency.

ANR Freight - Los Angeles, California

Prepared a comprehensive Preliminary Endangerment Assessment (PEA) of petroleum hydrocarbon and metal contamination of a former freight depot. This evaluation was as the basis for reaching closure of the site with lead regulatory agency.

Kaiser Ventures Incorporated, Fontana, California

Prepared comprehensive health risk assessment of semi-volatile organic chemicals and metals for 23-acre parcel of a 1,100-acre former steel mill. The health risk assessment was used to determine clean up goals and as the basis for granting closure of the site by lead regulatory agency. Air dispersion modeling using ISCST3 was performed to determine downwind exposure point concentrations at sensitive receptors within a 1 kilometer radius of the site. The results of the health risk assessment were presented at a public meeting sponsored by the Department of Toxic Substances Control (DTSC) in the community potentially affected by the site.

Unocal Corporation - Los Angeles, California

Prepared comprehensive assessment of petroleum hydrocarbons and metals for a former petroleum service station located next to sensitive population center (elementary school). The assessment used a probabilistic approach to estimate risks to the community and was used as the basis for granting closure of the site by lead regulatory agency.

Client: Confidential, Los Angeles, California

Managed oversight of remedial investigation most contaminated heavy metal site in California. Lead concentrations in soil excess of 68,000,000 parts per billion (ppb) have been measured at the site. This State Superfund Site was a former hard chrome plating operation that operated for approximately 40-years.

Client: Confidential, San Francisco, California

Coordinator of regional monitoring program to determine background concentrations of metals in air. Acted as liaison with SCAQMD and CARB to perform co-location sampling and comparison of accepted regulatory method with ASTM methodology.

Client: Confidential, San Francisco, California

Analyzed historical air monitoring data for South Coast Air Basin in Southern California and potential health risks related to ambient concentrations of carcinogenic metals and volatile organic compounds. Identified and reviewed the available literature and calculated risks from toxins in South Coast Air Basin.

IT Corporation, North Carolina

Prepared comprehensive evaluation of potential exposure of workers to air-borne VOCs at hazardous waste storage facility under SUPERFUND cleanup decree. Assessment used in developing health based clean-up levels.

Professional Associations

American Public Health Association (APHA)

Association for Environmental Health and Sciences (AEHS)

American Chemical Society (ACS)

International Society of Environmental Forensics (ISEF)

Society of Environmental Toxicology and Chemistry (SETAC)

Publications and Presentations:

Books and Book Chapters

- Sullivan, P., **J.J. J. Clark**, F.J. Agardy, and P.E. Rosenfeld. (2007). *Synthetic Toxins In The Food, Water and Air of American Cities*. Elsevier, Inc. Burlington, MA.
- Sullivan, P. and **J.J. J. Clark**. 2006. *Choosing Safer Foods, A Guide To Minimizing Synthetic Chemicals In Your Diet*. Elsevier, Inc. Burlington, MA.
- Sullivan, P., Agardy, F.J., and **J.J.J. Clark**. 2005. *The Environmental Science of Drinking Water*. Elsevier, Inc. Burlington, MA.
- Sullivan, P.J., Agardy, F.J., **Clark, J.J.J.** 2002. *America's Threatened Drinking Water: Hazards and Solutions*. Trafford Publishing, Victoria B.C.
- Clark, J.J.J.** 2001. "TBA: Chemical Properties, Production & Use, Fate and Transport, Toxicology, Detection in Groundwater, and Regulatory Standards" in *Oxygenates in the Environment*. Art Diaz, Ed.. Oxford University Press: New York.
- Clark, J.J.J.** 2000. "Toxicology of Perchlorate" in *Perchlorate in the Environment*. Edward Urbansky, Ed. Kluwer/Plenum: New York.
- Clark, J.J.J.** 1995. Probabilistic Forecasting of Volatile Organic Compound Concentrations At The Soil Surface From Contaminated Groundwater. UMI.
- Baker, J.; **Clark, J.J.J.**; Stanford, J.T. 1994. Ex Situ Remediation of Diesel Contaminated Railroad Sand by Soil Washing. Principles and Practices for Diesel Contaminated Soils, Volume III. P.T. Kostecki, E.J. Calabrese, and C.P.L. Barkan, eds. Amherst Scientific Publishers, Amherst, MA. pp 89-96.

Journal and Proceeding Articles

- Tam L. K., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008) A Statistical Analysis Of Attic Dust And Blood Lipid Concentrations Of Tetrachloro-p-Dibenzodioxin (TCDD) Toxicity Equivalency Quotients (TEQ) In Two Populations Near Wood Treatment Facilities. *Organohalogen Compounds*, Volume 70 (2008) page 002254.
- Tam L. K., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008) Methods For Collect Samples For Assessing Dioxins And Other Environmental Contaminants In Attic Dust: A Review. *Organohalogen Compounds*, Volume 70 (2008) page 000527
- Hensley A.R., Scott, A., Rosenfeld P.E., **Clark, J.J.J.** (2007). "Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility." *Environmental Research*. 105:194-199.
- Rosenfeld, P.E., **Clark, J. J.**, Hensley, A.R., and Suffet, I.H. 2007. "The Use Of An Odor Wheel Classification For The Evaluation of Human Health Risk Criteria For Compost Facilities" *Water Science & Technology*. 55(5): 345-357.
- Hensley A.R., Scott, A., Rosenfeld P.E., **Clark, J.J.J.** 2006. "Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility." The 26th International Symposium on Halogenated Persistent Organic Pollutants –

DIOXIN2006, August 21 – 25, 2006. Radisson SAS Scandinavia Hotel in Oslo Norway.

Rosenfeld, P.E., **Clark, J. J.** and Suffet, I.H. 2005. “The Value Of An Odor Quality Classification Scheme For Compost Facility Evaluations” The U.S. Composting Council’s 13th Annual Conference January 23 - 26, 2005, Crowne Plaza Riverwalk, San Antonio, TX.

Rosenfeld, P.E., **Clark, J. J.** and Suffet, I.H. 2004. “The Value Of An Odor Quality Classification Scheme For Urban Odor” WEFTEC 2004. 77th Annual Technical Exhibition & Conference October 2 - 6, 2004, Ernest N. Morial Convention Center, New Orleans, Louisiana.

Clark, J.J.J. 2003. “Manufacturing, Use, Regulation, and Occurrence of a Known Endocrine Disrupting Chemical (EDC), 2,4-Dichlorophenoxyacetic Acid (2,4-D) in California Drinking Water Supplies.” National Groundwater Association Southwest Focus Conference: Water Supply and Emerging Contaminants. Minneapolis, MN. March 20, 2003.

Rosenfeld, P. and **J.J.J. Clark.** 2003. “Understanding Historical Use, Chemical Properties, Toxicity, and Regulatory Guidance” National Groundwater Association Southwest Focus Conference: Water Supply and Emerging Contaminants. Phoenix, AZ. February 21, 2003.

Clark, J.J.J., Brown A. 1999. Perchlorate Contamination: Fate in the Environment and Treatment Options. In Situ and On-Site Bioremediation, Fifth International Symposium. San Diego, CA, April, 1999.

Clark, J.J.J. 1998. Health Effects of Perchlorate and the New Reference Dose (RfD). Proceedings From the Groundwater Resource Association Seventh Annual Meeting, Walnut Creek, CA, October 23, 1998.

Browne, T., **Clark, J.J.J.** 1998. Treatment Options For Perchlorate In Drinking Water. Proceedings From the Groundwater Resource Association Seventh Annual Meeting, Walnut Creek, CA, October 23, 1998.

Clark, J.J.J., Brown, A., Rodriguez, R. 1998. The Public Health Implications of MtBE and Perchlorate in Water: Risk Management Decisions for Water Purveyors. Proceedings of the National Ground Water Association, Anaheim, CA, June 3-4, 1998.

Clark J.J.J., Brown, A., Ulrey, A. 1997. Impacts of Perchlorate On Drinking Water In The Western United States. U.S. EPA Symposium on Biological and Chemical Reduction of Chlorate and Perchlorate, Cincinnati, OH, December 5, 1997.

Clark, J.J.J.; Corbett, G.E.; Kerger, B.D.; Finley, B.L.; Paustenbach, D.J. 1996. Dermal Uptake of Hexavalent Chromium In Human Volunteers: Measures of Systemic Uptake From Immersion in Water At 22 PPM. Toxicologist. 30(1):14.

- Dodge, D.G.; **Clark, J.J.J.**; Kerger, B.D.; Richter, R.O.; Finley, B.L.; Paustenbach, D.J. 1996. Assessment of Airborne Hexavalent Chromium In The Home Following Use of Contaminated Tapwater. *Toxicologist*. 30(1):117-118.
- Paulo, M.T.; Gong, H., Jr.; **Clark, J.J.J.** (1992). Effects of Pretreatment with Ipratropium Bromide in COPD Patients Exposed to Ozone. *American Review of Respiratory Disease*. 145(4):A96.
- Harber, P.H.; Gong, H., Jr.; Lachenbruch, A.; **Clark, J.**; Hsu, P. (1992). Respiratory Pattern Effect of Acute Sulfur Dioxide Exposure in Asthmatics. *American Review of Respiratory Disease*. 145(4):A88.
- McManus, M.S.; Gong, H., Jr.; Clements, P.; **Clark, J.J.J.** (1991). Respiratory Response of Patients With Interstitial Lung Disease To Inhaled Ozone. *American Review of Respiratory Disease*. 143(4):A91.
- Gong, H., Jr.; Simmons, M.S.; McManus, M.S.; Tashkin, D.P.; Clark, V.A.; Detels, R.; **Clark, J.J.** (1990). Relationship Between Responses to Chronic Oxidant and Acute Ozone Exposures in Residents of Los Angeles County. *American Review of Respiratory Disease*. 141(4):A70.
- Tierney, D.F. and **J.J.J. Clark**. (1990). Lung Polyamine Content Can Be Increased By Spermidine Infusions Into Hyperoxic Rats. *American Review of Respiratory Disease*. 139(4):A41.

EXHIBIT B

HARP2 Risk Results

Risk Calculations For Diesel Exhaust

$$\text{Risk}_{\text{inh-res}} = \text{Dose}_{\text{air}} * \text{CPF} * \text{ASF} * \text{ED}/\text{AT}$$

$$\text{Dose}_{\text{air}} = \text{C}_{\text{air}} * \{\text{BR}/\text{BW}\} * \text{A} * \text{EF} * 10^{-6}$$

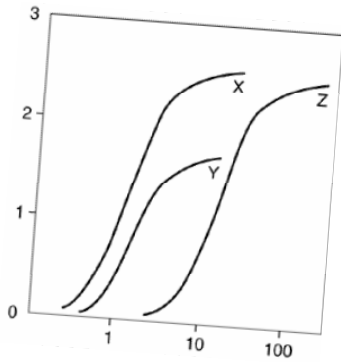
Variable	Description	Units	Value	Variable	Description	Units	Value
Risk _{inh-air}	Residential inhalation cancer risk	Unitless	Calculated	Dose _{air}	Daily inhalation dose	mg/kg-day	Calculated
Dose _{air}	Daily inhalation dose	mg/kg-day	Calculated	C _{air}	Concentration in air	ug/m ³	0.38922
CPF	Inhalation cancer potency factor	(mg/kg-day) ⁻¹	Chemical Specific	{BR/BW}	Daily Breathing rate normalized to body weight	L/kg body weight-day	Calculated
ASF	Age sensitivity factor for a specified age group	Unitless	Calculated	A	Inhalation absorption fraction	Unitless	1
ED	Exposure duration (in years) for a specified age group	years	Calculated	EF	Exposure frequency (days/365 days)	Unitless	Calculated
AT	Averaging time for lifetime cancer risk	years	70	10 ⁻⁶	micrograms to milligrams conversion, liters to cubic meters conversion	Unitless	Calculated
FAH	Fraction of time spent at home	Unitless	Calculated				

Residential Exposures

Age Group	Risk	Age Sensitivity	FAH	ED	CPF	Dose Air	Cair	BR/BW	A	EF
3rd Trimester	3.36E-06	10	0.85	0.25	1.1	0.000100473	0.38922	361	1	0.715068
0<2	8.10E-05	10	0.85	2	1.1	0.000303368	0.38922	1090	1	0.715068
2<9	3.33E-06	3	0.72	0.41	1.1	0.000239633	0.38922	861	1	0.715068
2<16	0.00E+00	3	0.72	0	1.1	0.000207348	0.38922	745	1	0.715068
16<30	2.79E-06	1	0.73	2.61	1.1	9.32369E-05	0.38922	335	1	0.715068
16-70	2.42E-06	1	0.73	2.61	1.1	8.07125E-05	0.38922	290	1	0.715068

3rd trimester to 2.61 **8.77E-05**

2.61 years exposure Adults **2.42E-06**



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Principal Toxicologist

Toxicology/Exposure Assessment Modeling

Risk Assessment/Analysis/Dispersion Modeling

Education:

Ph.D., Environmental Health Science, University of California, 1995

M.S., Environmental Health Science, University of California, 1993

B.S., Biophysical and Biochemical Sciences, University of Houston, 1987

Professional Experience:

Dr. Clark is a well recognized toxicologist, air modeler, and health scientist. He has 20 years of experience in researching the effects of environmental contaminants on human health including environmental fate and transport modeling (SCREEN3, AEROMOD, ISCST3, Johnson-Ettinger Vapor Intrusion Modeling); exposure assessment modeling (partitioning of contaminants in the environment as well as PBPK modeling); conducting and managing human health risk assessments for regulatory compliance and risk-based clean-up levels; and toxicological and medical literature research.

Significant projects performed by Dr. Clark include the following:

LITIGATION SUPPORT

Case: James Harold Caygle, et al, v. Drummond Company, Inc. Circuit Court for the Tenth Judicial Circuit, Jefferson County, Alabama. Civil Action. CV-2009

Client: Environmental Litigation Group, Birmingham, Alabama

Dr. Clark performed an air quality assessment of emissions from a coke factory located in Tarrant, Alabama. The assessment reviewed include a comprehensive review of air quality standards, measured concentrations of pollutants from factory, an inspection of the facility and detailed assessment of the impacts on the community. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: Rose Roper V. Nissan North America, et al. Superior Court of the State Of California for the County Of Los Angeles – Central Civil West. Civil Action. NC041739

Client: Rose, Klein, Marias, LLP, Long Beach, California

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to multiple chemicals, including benzene, who later developed a respiratory distress. A review of the individual's medical and occupational history was performed to prepare an exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to respiratory irritants. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: O'Neil V. Sherwin Williams, et al. United States District Court Central District of California

Client: Rose, Klein, Marias, LLP, Long Beach, California

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to petroleum distillates who later developed a bladder cancer. A review of the individual's medical and occupational history was performed to prepare a quantitative exposure assessment. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Summary judgment for defendants.

Case: Moore V., Shell Oil Company, et al. Superior Court of the State Of California for the County Of Los Angeles

Client: Rose, Klein, Marias, LLP, Long Beach, California

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to chemicals while benzene who later developed a leukogenic disease. A review of the individual's medical and occupational history was performed to prepare a quantitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to refined petroleum hydrocarbons. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: Raymond Saltonstall V. Fuller O'Brien, KILZ, and Zinsser, et al. United States District Court Central District of California

Client: Rose, Klein, Marias, LLP, Long Beach, California

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to benzene who later developed a leukogenic disease. A review of the individual's medical and occupational history was performed to prepare a quantitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to refined petroleum hydrocarbons. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: Richard Boyer and Elizabeth Boyer, husband and wife, V. DESCO Corporation, et al. Circuit Court of Brooke County, West Virginia. Civil Action Number 04-C-7G.

Client: Frankovitch, Anetakis, Colantonio & Simon, Morgantown, West Virginia.

Dr. Clark performed a toxicological assessment of a family exposed to chlorinated solvents released from the defendant's facility into local drinking water supplies. A review of the individual's medical and occupational history was performed to prepare a qualitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to chlorinated solvents. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: JoAnne R. Cook, V. DESCO Corporation, et al. Circuit Court of Brooke County, West Virginia. Civil Action Number 04-C-9R

Client: Frankovitch, Anetakis, Colantonio & Simon, Morgantown, West Virginia.

Dr. Clark performed a toxicological assessment of an individual exposed to chlorinated solvents released from the defendant's facility into local drinking water supplies. A review of the individual's medical and occupational history was performed to prepare a qualitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to chlorinated solvents. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: Patrick Allen And Susan Allen, husband and wife, and Andrew Allen, a minor, V. DESCO Corporation, et al. Circuit Court of Brooke County, West Virginia. Civil Action Number 04-C-W

Client: Frankovitch, Anetakis, Colantonio & Simon, Morgantown, West Virginia.

Dr. Clark performed a toxicological assessment of a family exposed to chlorinated solvents released from the defendant's facility into local drinking water supplies. A review of the individual's medical and occupational history was performed to prepare a qualitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to chlorinated solvents. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: Michael Fahey, Susan Fahey V. Atlantic Richfield Company, et al. United States District Court Central District of California Civil Action Number CV-06 7109 JCL.

Client: Rose, Klein, Marias, LLP, Long Beach, California

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to refined petroleum hydrocarbons who later developed a leukogenic disease. A review of the individual's medical and occupational history was performed to prepare a qualitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to refined petroleum hydrocarbons. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: Constance Acevedo, et al., V. California Spray-Chemical Company, et al., Superior Court of the State Of California, County Of Santa Cruz. Case No. CV 146344

Dr. Clark performed a comprehensive exposure assessment of community members exposed to toxic metals from a former lead arsenate manufacturing facility. The former manufacturing site had undergone a DTSC mandated removal action/remediation for the presence of the toxic metals at the site. Opinions were presented regarding the elevated levels of arsenic and lead (in attic dust and soils) found throughout the community and the potential for harm to the plaintiffs in question.

Case Result: Settlement in favor of defendant.

Case: Michael Nawrocki V. The Coastal Corporation, Kurk Fuel Company, Pautler Oil Service, State of New York Supreme Court, County of Erie, Index Number I2001-11247

Client: Richard G. Berger Attorney At Law, Buffalo, New York

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to refined petroleum hydrocarbons who later developed a leukogenic disease. A review of the individual's medical and occupational history was performed to prepare a qualitative exposure assessment. The exposure assessment was evaluated against the

known outcomes in published literature to exposure to refined petroleum hydrocarbons. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Judgement in favor of defendant.

SELECTED AIR MODELING RESEARCH/PROJECTS

Client – Confidential

Dr. Clark performed a comprehensive evaluation of criteria pollutants, air toxins, and particulate matter emissions from a carbon black production facility to determine the impacts on the surrounding communities. The results of the dispersion model will be used to estimate acute and chronic exposure concentrations to multiple contaminants and will be incorporated into a comprehensive risk evaluation.

Client – Confidential

Dr. Clark performed a comprehensive evaluation of air toxins and particulate matter emissions from a railroad tie manufacturing facility to determine the impacts on the surrounding communities. The results of the dispersion model have been used to estimate acute and chronic exposure concentrations to multiple contaminants and have been incorporated into a comprehensive risk evaluation.

Client – Los Angeles Alliance for a New Economy (LAANE), Los Angeles, California

Dr. Clark is advising the LAANE on air quality issues related to current flight operations at the Los Angeles International Airport (LAX) operated by the Los Angeles World Airport (LAWA) Authority. He is working with the LAANE and LAX staff to develop a comprehensive strategy for meeting local community concerns over emissions from flight operations and to engage federal agencies on the issue of local impacts of community airports.

Client – City of Santa Monica, Santa Monica, California

Dr. Clark is advising the City of Santa Monica on air quality issues related to current flight operations at the facility. He is working with the City staff to develop a comprehensive strategy for meeting local community concerns over emissions from flight operations and to engage federal agencies on the issue of local impacts of community airports.

Client: Omnitrans, San Bernardino, California

Dr. Clark managed a public health survey of three communities near transit fueling facilities in San Bernardino and Montclair California in compliance with California Senate Bill 1927. The survey included an epidemiological survey of the effected communities, emission surveys of local businesses, dispersion modeling to determine potential emission concentrations within the communities, and a comprehensive risk assessment of each community. The results of the study were presented to the Governor as mandated by Senate Bill 1927.

Client: Confidential, San Francisco, California

Summarized cancer types associated with exposure to metals and smoking. Researched the specific types of cancers associated with exposure to metals and smoking. Provided causation analysis of the association between cancer types and exposure for use by non-public health professionals.

Client: Confidential, Minneapolis, Minnesota

Prepared human health risk assessment of workers exposed to VOCs from neighboring petroleum storage/transport facility. Reviewed the systems in place for distribution of petroleum hydrocarbons to identify chemicals of concern (COCs), prepared comprehensive toxicological summaries of COCs, and quantified potential risks from carcinogens and non-carcinogens to receptors at or adjacent to site. This evaluation was used in the support of litigation.

Client – United Kingdom Environmental Agency

Dr. Clark is part of team that performed comprehensive evaluation of soil vapor intrusion of VOCs from former landfill adjacent residences for the United Kingdom's Environment

Agency. The evaluation included collection of liquid and soil vapor samples at site, modeling of vapor migration using the Johnson Ettinger Vapor Intrusion model, and calculation of site-specific health based vapor thresholds for chlorinated solvents, aromatic hydrocarbons, and semi-volatile organic compounds. The evaluation also included a detailed evaluation of the use, chemical characteristics, fate and transport, and toxicology of chemicals of concern (COC). The results of the evaluation have been used as a briefing tool for public health professionals.

EMERGING/PERSISTENT CONTAMINANT RESEARCH/PROJECTS

Client: Ameren Services, St. Louis, Missouri

Managed the preparation of a comprehensive human health risk assessment of workers and residents at or near an NPL site in Missouri. The former operations at the Property included the servicing and repair of electrical transformers, which resulted in soils and groundwater beneath the Property and adjacent land becoming impacted with PCB and chlorinated solvent compounds. The results were submitted to U.S. EPA for evaluation and will be used in the final ROD.

Client: City of Santa Clarita, Santa Clarita, California

Dr. Clark is managing the oversight of the characterization, remediation and development activities of a former 1,000 acre munitions manufacturing facility for the City of Santa Clarita. The site is impacted with a number of contaminants including perchlorate, unexploded ordinance, and volatile organic compounds (VOCs). The site is currently under a number of regulatory consent orders, including an Imminent and Substantial Endangerment Order. Dr. Clark is assisting the impacted municipality with the development of remediation strategies, interaction with the responsible parties and stakeholders, as well as interfacing with the regulatory agency responsible for oversight of the site cleanup.

Client: Confidential, Los Angeles, California

Prepared comprehensive evaluation of perchlorate in environment. Dr. Clark evaluated the production, use, chemical characteristics, fate and transport, toxicology, and remediation of perchlorate. Perchlorates form the basis of solid rocket fuels and have recently been detected in water supplies in the United States. The results of this research

were presented to the USEPA, National GroundWater, and ultimately published in a recent book entitled *Perchlorate in the Environment*.

Client – Confidential, Los Angeles, California

Dr. Clark is performing a comprehensive review of the potential for pharmaceuticals and their by-products to impact groundwater and surface water supplies. This evaluation will include a review if available data on the history of pharmaceutical production in the United States; the chemical characteristics of various pharmaceuticals; environmental fate and transport; uptake by xenobiotics; the potential effects of pharmaceuticals on water treatment systems; and the potential threat to public health. The results of the evaluation may be used as a briefing tool for non-public health professionals.

PUBLIC HEALTH/TOXICOLOGY

Client: Brayton Purcell, Novato, California

Dr. Clark performed a toxicological assessment of residents exposed to methyl-tertiary butyl ether (MTBE) from leaking underground storage tanks (LUSTs) adjacent to the subject property. The symptomology of residents and guests of the subject property were evaluated against the known outcomes in published literature to exposure to MTBE. The study found that residents had been exposed to MTBE in their drinking water; that concentrations of MTBE detected at the site were above regulatory guidelines; and, that the symptoms and outcomes expressed by residents and guests were consistent with symptoms and outcomes documented in published literature.

Client: Confidential, San Francisco, California

Identified and analyzed fifty years of epidemiological literature on workplace exposures to heavy metals. This research resulted in a summary of the types of cancer and non-cancer diseases associated with occupational exposure to chromium as well as the mortality and morbidity rates.

Client: Confidential, San Francisco, California

Summarized major public health research in United States. Identified major public health research efforts within United States over last twenty years. Results were used as a briefing tool for non-public health professionals.

Client: Confidential, San Francisco, California

Quantified the potential multi-pathway dose received by humans from a pesticide applied indoors. Part of team that developed exposure model and evaluated exposure concentrations in a comprehensive report on the plausible range of doses received by a specific person. This evaluation was used in the support of litigation.

Client: Covanta Energy, Westwood, California

Evaluated health risk from metals in biosolids applied as soil amendment on agricultural lands. The biosolids were created at a forest waste cogeneration facility using 96% whole tree wood chips and 4 percent green waste. Mass loading calculations were used to estimate Cr(VI) concentrations in agricultural soils based on a maximum loading rate of 40 tons of biomass per acre of agricultural soil. The results of the study were used by the Regulatory agency to determine that the application of biosolids did not constitute a health risk to workers applying the biosolids or to residences near the agricultural lands.

Client – United Kingdom Environmental Agency

Oversaw a comprehensive toxicological evaluation of methyl-*tertiary* butyl ether (MtBE) for the United Kingdom's Environment Agency. The evaluation included available data on the production, use, chemical characteristics, fate and transport, toxicology, and remediation of MtBE. The results of the evaluation have been used as a briefing tool for public health professionals.

Client – Confidential, Los Angeles, California

Prepared comprehensive evaluation of *tertiary* butyl alcohol (TBA) in municipal drinking water system. TBA is the primary breakdown product of MtBE, and is suspected to be the primary cause of MtBE toxicity. This evaluation will include available information on the production, use, chemical characteristics, fate and transport in the environment, absorption, distribution, routes of detoxification, metabolites, carcinogenic potential, and remediation of TBA. The results of the evaluation were used as a briefing tool for non-public health professionals.

Client – Confidential, Los Angeles, California

Prepared comprehensive evaluation of methyl *tertiary* butyl ether (MTBE) in municipal drinking water system. MTBE is a chemical added to gasoline to increase the octane

rating and to meet Federally mandated emission criteria. The evaluation included available data on the production, use, chemical characteristics, fate and transport, toxicology, and remediation of MTBE. The results of the evaluation have been used as a briefing tool for non-public health professionals.

Client – Ministry of Environment, Lands & Parks, British Columbia

Dr. Clark assisted in the development of water quality guidelines for methyl tertiary-butyl ether (MTBE) to protect water uses in British Columbia (BC). The water uses to be considered includes freshwater and marine life, wildlife, industrial, and agricultural (e.g., irrigation and livestock watering) water uses. Guidelines from other jurisdictions for the protection of drinking water, recreation and aesthetics were to be identified.

Client: Confidential, Los Angeles, California

Prepared physiologically based pharmacokinetic (PBPK) assessment of lead risk of receptors at middle school built over former industrial facility. This evaluation is being used to determine cleanup goals and will be basis for regulatory closure of site.

Client: Kaiser Venture Incorporated, Fontana, California

Prepared PBPK assessment of lead risk of receptors at a 1,100-acre former steel mill. This evaluation was used as the basis for granting closure of the site by lead regulatory agency.

RISK ASSESSMENTS/REMEDIAL INVESTIGATIONS

Client: Confidential, Atlanta, Georgia

Researched potential exposure and health risks to community members potentially exposed to creosote, polycyclic aromatic hydrocarbons, pentachlorophenol, and dioxin compounds used at a former wood treatment facility. Prepared a comprehensive toxicological summary of the chemicals of concern, including the chemical characteristics, absorption, distribution, and carcinogenic potential. Prepared risk characterization of the carcinogenic and non-carcinogenic chemicals based on the exposure assessment to quantify the potential risk to members of the surrounding community. This evaluation was used to help settle class-action tort.

Client: Confidential, Escondido, California

Prepared comprehensive Preliminary Endangerment Assessment (PEA) of dense non-aqueous liquid phase hydrocarbon (chlorinated solvents) contamination at a former printed circuit board manufacturing facility. This evaluation was used for litigation support and may be used as the basis for reaching closure of the site with the lead regulatory agency.

Client: Confidential, San Francisco, California

Summarized epidemiological evidence for connective tissue and autoimmune diseases for product liability litigation. Identified epidemiological research efforts on the health effects of medical prostheses. This research was used in a meta-analysis of the health effects and as a briefing tool for non-public health professionals.

Client: Confidential, Bogotá, Columbia

Prepared comprehensive evaluation of the potential health risks associated with the redevelopment of a 13.7 hectares plastic manufacturing facility in Bogotá, Colombia. The risk assessment was used as the basis for the remedial goals and closure of the site.

Client: Confidential, Los Angeles, California

Prepared comprehensive human health risk assessment of students, staff, and residents potentially exposed to heavy metals (principally cadmium) and VOCs from soil and soil vapor at 12-acre former crude oilfield and municipal landfill. The site is currently used as a middle school housing approximately 3,000 children. The evaluation determined that the site was safe for the current and future uses and was used as the basis for regulatory closure of site.

Client: Confidential, Los Angeles, California

Managed remedial investigation (RI) of heavy metals and volatile organic chemicals (VOCs) for a 15-acre former manufacturing facility. The RI investigation of the site included over 800 different sampling locations and the collection of soil, soil gas, and groundwater samples. The site is currently used as a year round school housing approximately 3,000 children. The Remedial Investigation was performed in a manner

that did not interrupt school activities and met the time restrictions placed on the project by the overseeing regulatory agency. The RI Report identified the off-site source of metals that impacted groundwater beneath the site and the sources of VOCs in soil gas and groundwater. The RI included a numerical model of vapor intrusion into the buildings at the site from the vadose zone to determine exposure concentrations and an air dispersion model of VOCs from the proposed soil vapor treatment system. The Feasibility Study for the Site is currently being drafted and may be used as the basis for granting closure of the site by DTSC.

Client: Confidential, Los Angeles, California

Prepared comprehensive human health risk assessment of students, staff, and residents potentially exposed to heavy metals (principally lead), VOCs, SVOCs, and PCBs from soil, soil vapor, and groundwater at 15-acre former manufacturing facility. The site is currently used as a year round school housing approximately 3,000 children. The evaluation determined that the site was safe for the current and future uses and will be basis for regulatory closure of site.

Client: Confidential, Los Angeles, California

Prepared comprehensive evaluation of VOC vapor intrusion into classrooms of middle school that was former 15-acre industrial facility. Using the Johnson-Ettinger Vapor Intrusion model, the evaluation determined acceptable soil gas concentrations at the site that did not pose health threat to students, staff, and residents. This evaluation is being used to determine cleanup goals and will be basis for regulatory closure of site.

Client –Dominguez Energy, Carson, California

Prepared comprehensive evaluation of the potential health risks associated with the redevelopment of 6-acre portion of a 500-acre oil and natural gas production facility in Carson, California. The risk assessment was used as the basis for closure of the site.

Kaiser Ventures Incorporated, Fontana, California

Prepared health risk assessment of semi-volatile organic chemicals and metals for a fifty-year old wastewater treatment facility used at a 1,100-acre former steel mill. This evaluation was used as the basis for granting closure of the site by lead regulatory agency.

ANR Freight - Los Angeles, California

Prepared a comprehensive Preliminary Endangerment Assessment (PEA) of petroleum hydrocarbon and metal contamination of a former freight depot. This evaluation was as the basis for reaching closure of the site with lead regulatory agency.

Kaiser Ventures Incorporated, Fontana, California

Prepared comprehensive health risk assessment of semi-volatile organic chemicals and metals for 23-acre parcel of a 1,100-acre former steel mill. The health risk assessment was used to determine clean up goals and as the basis for granting closure of the site by lead regulatory agency. Air dispersion modeling using ISCST3 was performed to determine downwind exposure point concentrations at sensitive receptors within a 1 kilometer radius of the site. The results of the health risk assessment were presented at a public meeting sponsored by the Department of Toxic Substances Control (DTSC) in the community potentially affected by the site.

Unocal Corporation - Los Angeles, California

Prepared comprehensive assessment of petroleum hydrocarbons and metals for a former petroleum service station located next to sensitive population center (elementary school). The assessment used a probabilistic approach to estimate risks to the community and was used as the basis for granting closure of the site by lead regulatory agency.

Client: Confidential, Los Angeles, California

Managed oversight of remedial investigation most contaminated heavy metal site in California. Lead concentrations in soil excess of 68,000,000 parts per billion (ppb) have been measured at the site. This State Superfund Site was a former hard chrome plating operation that operated for approximately 40-years.

Client: Confidential, San Francisco, California

Coordinator of regional monitoring program to determine background concentrations of metals in air. Acted as liaison with SCAQMD and CARB to perform co-location sampling and comparison of accepted regulatory method with ASTM methodology.

Client: Confidential, San Francisco, California

Analyzed historical air monitoring data for South Coast Air Basin in Southern California and potential health risks related to ambient concentrations of carcinogenic metals and volatile organic compounds. Identified and reviewed the available literature and calculated risks from toxins in South Coast Air Basin.

IT Corporation, North Carolina

Prepared comprehensive evaluation of potential exposure of workers to air-borne VOCs at hazardous waste storage facility under SUPERFUND cleanup decree. Assessment used in developing health based clean-up levels.

Professional Associations

American Public Health Association (APHA)

Association for Environmental Health and Sciences (AEHS)

American Chemical Society (ACS)

California Redevelopment Association (CRA)

International Society of Environmental Forensics (ISEF)

Society of Environmental Toxicology and Chemistry (SETAC)

Publications and Presentations:

Books and Book Chapters

Sullivan, P., **J.J. J. Clark**, F.J. Agardy, and P.E. Rosenfeld. (2007). *Synthetic Toxins In The Food, Water and Air of American Cities*. Elsevier, Inc. Burlington, MA.

Sullivan, P. and **J.J. J. Clark**. 2006. *Choosing Safer Foods, A Guide To Minimizing Synthetic Chemicals In Your Diet*. Elsevier, Inc. Burlington, MA.

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Sullivan, P.J., Agardy, F.J., **Clark, J.J.J.** 2002. *America's Threatened Drinking Water: Hazards and Solutions*. Trafford Publishing, Victoria B.C.

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Clark, J.J.J. 2000. "Toxicology of Perchlorate" in *Perchlorate in the Environment*. Edward Urbansky, Ed. Kluwer/Plenum: New York.

Clark, J.J.J. 1995. Probabilistic Forecasting of Volatile Organic Compound Concentrations At The Soil Surface From Contaminated Groundwater. UMI.

Baker, J.; **Clark, J.J.J.**; Stanford, J.T. 1994. Ex Situ Remediation of Diesel Contaminated Railroad Sand by Soil Washing. Principles and Practices for Diesel Contaminated Soils, Volume III. P.T. Kostecki, E.J. Calabrese, and C.P.L. Barkan, eds. Amherst Scientific Publishers, Amherst, MA. pp 89-96.

Journal and Proceeding Articles

- Tam L. K., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008) A Statistical Analysis Of Attic Dust And Blood Lipid Concentrations Of Tetrachloro-p-Dibenzodioxin (TCDD) Toxicity Equivalency Quotients (TEQ) In Two Populations Near Wood Treatment Facilities. *Organohalogen Compounds*, Volume 70 (2008) page 002254.
- Tam L. K., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008) Methods For Collect Samples For Assessing Dioxins And Other Environmental Contaminants In Attic Dust: A Review. *Organohalogen Compounds*, Volume 70 (2008) page 000527
- Hensley A.R., Scott, A., Rosenfeld P.E., **Clark, J.J.J.** (2007). "Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility." *Environmental Research*. 105:194-199.
- Rosenfeld, P.E., **Clark, J. J.**, Hensley, A.R., and Suffet, I.H. 2007. "The Use Of An Odor Wheel Classification For The Evaluation of Human Health Risk Criteria For Compost Facilities" *Water Science & Technology*. 55(5): 345-357.
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- Rosenfeld, P.E., **Clark, J. J.** and Suffet, I.H. 2005. "The Value Of An Odor Quality Classification Scheme For Compost Facility Evaluations" The U.S. Composting Council's 13th Annual Conference January 23 - 26, 2005, Crowne Plaza Riverwalk, San Antonio, TX.
- Rosenfeld, P.E., **Clark, J. J.** and Suffet, I.H. 2004. "The Value Of An Odor Quality Classification Scheme For Urban Odor" WEFTEC 2004. 77th Annual Technical Exhibition & Conference October 2 - 6, 2004, Ernest N. Morial Convention Center, New Orleans, Louisiana.
- Clark, J.J.J.** 2003. "Manufacturing, Use, Regulation, and Occurrence of a Known Endocrine Disrupting Chemical (EDC), 2,4-Dichlorophenoxyacetic Acid (2,4-D) in California Drinking Water Supplies." National Groundwater Association Southwest Focus Conference: Water Supply and Emerging Contaminants. Minneapolis, MN. March 20, 2003.

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- Browne, T., **Clark, J.J.J.** 1998. Treatment Options For Perchlorate In Drinking Water. Proceedings From the Groundwater Resource Association Seventh Annual Meeting, Walnut Creek, CA, October 23, 1998.
- Clark, J.J.J.**, Brown, A., Rodriguez, R. 1998. The Public Health Implications of MtBE and Perchlorate in Water: Risk Management Decisions for Water Purveyors. Proceedings of the National Ground Water Association, Anaheim, CA, June 3-4, 1998.
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Ozone Exposures in Residents of Los Angeles County. American Review of Respiratory Disease. 141(4):A70.

Tierney, D.F. and **J.J.J. Clark**. (1990). Lung Polyamine Content Can Be Increased By Spermidine Infusions Into Hyperoxic Rats. American Review of Respiratory Disease. 139(4):A41.

EXHIBIT B



WI #22-005.XX

October 20, 2022

Aidan P. Marshall
Adams Broadwell Joseph & Cardozo
520 Capitol Mall, Suite 350
Sacramento, CA 95814

SUBJECT: 1050 La Cienega Project Sustainable Communities Environmental Assessment, Comments on the Noise Analysis

Dear Mr. Marshall,

Per your request, I have reviewed the subject matter document for the 1050 La Cienega Project in Los Angeles, CA. The proposed Project would construct a mixed-use development with 290 residential units and 7,500 square feet of restaurant commercial use in a 28-story building.

The project is bordered by a 1-story commercial building to the north, 2-story residential buildings to the east, a 3-story commercial building to the south, and La Cienega Blvd. to the west. Across La Cienega Blvd, there is a parking lot, 3-story religious building (Temple Beth Am), 4-story educational building (Pressman Education Center and Academy) and a 4-story residential building with senior housing.

Baseline Noise Levels are not Properly Established

The noise analysis in Appendix H shows noise measurement locations on La Cienega Blvd. One measurement was taken at the project site, and another was taken by the Beverly Park Senior Apartments. No measurements were taken on S. Alfred Street where there are numerous residential receptors. Noise levels on S. Alfred Street could be as much as 10 dB lower than on La Cienega Blvd. due distance from La Cienega, lower traffic volume on S. Alfred Street, and shielding from La Cienega provided by existing structure. Additionally, no information is provided regarding the time of day the measurements were taken or the length of the measurements.

Construction Noise Analysis is Incomplete

The construction noise analysis only considers the grading phase of work. This work would occur at or below grade level where sound barriers would be most effective. The Los Angeles Municipal Code section 112.05 imposes a limit of 75 dBA at 50 ft for construction activities occurring between 7 am and 10 pm. The SCEA shows sound levels above 75 dBA from excavation, auger-cast pile installation, and DSM column installation without mitigation. The proposed mitigation measures include the used of 15-20 ft tall sound barriers along the project's eastern boundary, shielding the residences on S.

Alfred Street. According to the noise analysis in the SCEA, this would reduce the construction noise levels to below 75 dBA.

In order for sound barriers to be effective, they must block the line of sight between the source and the receiver. As the 28-story tower is erected, construction work would occur above the height of the tallest proposed barrier. There would be a direct line of sight to sensitive receptors. No calculations are presented for these phases of work and there is no evidence provided to show the sound level would be below the 75 dBA criteria.

We calculated the noise level from the tower construction to the residences on S. Alfred Street. The calculation is shown below. An Leq noise level of 79 dBA was calculated at the S. Alfred Street residences. This exceeds the 75 dBA criteria.

Table 1. Calculated Tower Construction Noise Levels at S. Alfred Street Residences

<u>Equipment</u>	RCNM Ref Values @ 50 ft			Noise Level @ 50 ft			Noise Level @ S. Alfred Street Residences		
	<u>Lmax</u>	<u>Util%</u>	<u>No.</u>	<u>Distance</u>	<u>Lmax</u>	<u>Leq</u>	<u>Distance</u>	<u>Lmax</u>	<u>Leq</u>
Crane	81.0	16%	1	50 ft	81	73	90	76	68
Welder / Torch	73.0	40%	1	50 ft	73	69	90	68	64
Generator	81.0	50%	1	50 ft	81	78	90	76	73
Pneumatic Tools	85.0	50%	1	50 ft	85	82	90	80	77
Man Lift	75.0	20%	1	50 ft	75	68	90	70	63
Total					85	84		80	79

This would be a *potentially significant* impact from construction noise that could require mitigation.

Operational Noise Analysis is Lacking

Sources of operational noise for this project include sound from the mechanical system, as well as sound from use of the pool terrace and roof deck.

Mechanical Equipment

The noise from mechanical equipment has not been evaluated. The noise analysis states “it is unlikely that the Project’s HVAC systems would be capable of increasing off-site noise levels by a discernable degree”. Based on our experience with similar projects, there would be several pieces of mechanical equipment which could generate audible noise off-site.

In our experience, typical mechanical equipment for this type of project includes garage exhaust fans, an emergency generator, and air handling units. An emergency generator could have a typical sound rating of 105 sound power level (PWL). This could generate a sound level of 71 dBA at a distance of 50 ft. The noise analysis states a 5 dB threshold of significance and lists the calculated ambient sound level on S. Alfred Street as 62 dBA. This would be a *significant impact* and would require mitigation.

Pool Deck/Terrace

The analysis of the pool deck & terrace relies on “reasonable use” and only considers a single person talking. It is more realistic to assume multiple occupants speaking at the same time. It is feasible this space could be used for parties and gatherings. It is also possible this space would be used in the evening and at night when there are lower ambient sound levels.

Excluding the effect of background music and shielding, 25 voices in “normal” conversation would generate 59 dBA at a distance of 30 ft. However, the existing ambient sound levels are elevated and may cause people to speak louder to be heard over traffic noise. With 25 “raised” voices, the resulting sound level would be approximately 65 dBA at a distance of 30 ft, and a sound level of 72 dBA would be generated by 5 people shouting.

No information has been provided regarding the time of day the baseline measurements were taken. To properly establish ambient sound levels, measurements should be taken over a minimum period of 24 hours. This allows for ambient sound levels to be determined for daytime and evening or nighttime hours. In the absence of ambient data during evening or nighttime hours, these levels could be much more than 5 dBA above the existing ambient. Thus, the noise from the pool deck/terrace would be ***potentially significant*** and would require mitigation.

Sleep Disturbance Threshold is Missing

Any nighttime activities should also be evaluated for potential sleep disturbance which could be caused by social events at the rooftop terrace areas. Sleep disturbance being noises which may not cause a person to become fully awake, but instead change a person’s sleep from one deeper level of sleep to a less restful level of sleep. Although the health effects of noise are not taken as seriously in the United States as they are in other countries, they are real and, in many parts of the country, pervasive. Noise can disturb sleep by making it more difficult to fall asleep, by waking someone after they are asleep, or by altering their sleep stage, e.g., reducing the amount of rapid eye movement (REM) sleep. Noise exposure for people who are sleeping has also been linked to increased blood pressure, increased heart rate, increase in body movements, and other physiological effects. Not surprisingly, people whose sleep is disturbed by noise often experience secondary effects such as increased fatigue, depressed mood, and decreased work performance.

Thus, excessive noise from rooftop activities occurring between 10 PM and 7 AM could cause sleep disturbance and would be potentially significant. The World Health Organization¹ identifies a guidance of 45 dBA Leq (outdoors) to avoid sleep disturbance from a continuous source, and a limit of 60 dBA Lmax for intermittent sources². However, it has been our experience that low frequency bass notes, commonly found in music played at lounges, can be problematic even when the A-weighted level complies with applicable code. This is partly because the low frequencies pass through the exterior walls and closed windows with little reduction. To illustrate this issue, Figure 1 shows noise measurement taken when music was playing at a hotel rooftop/poolside lounge. The nearby plaza was at ground level about 150 to 250 ft from the nearest subwoofers. Even several blocks away the low frequency pulse of the music was 6 decibels higher than the non-music ambient.

¹ <https://www.who.int/docstore/peh/noise/Comnoise-1.pdf>

² These outdoor levels assume that the residence reduces noise by 15 dBA with windows open, which is typical for conventional construction.

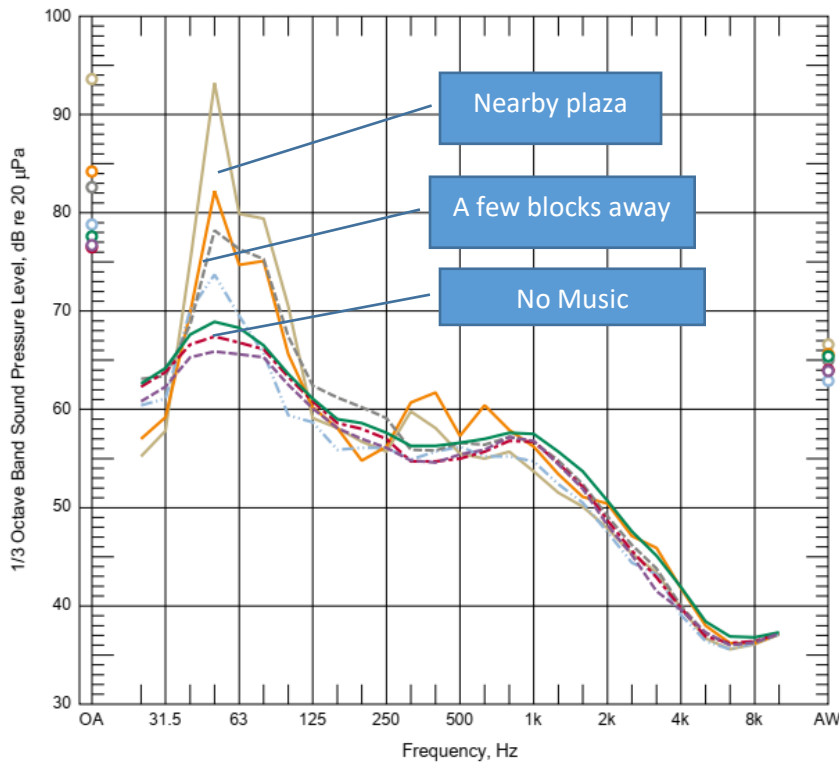


Figure 1 Sample Exterior Noise Near an Urban Hotel Lounge (L_{25})

Assuming music was played at a level of 85 dBA on the terrace, the sound from music would be 78 dBA at a distance of 30 ft. This is more than 5 dBA above the reported ambient sound level of 62 dBA. It is also well above the WHO guideline of 60 dBA to avoid sleep disturbance. This would potentially lead to a substantial and significant noise impact.

Per the SCEA requirements³, the SCEA is required to identify, analyze and mitigate any potentially significant or significant effects :

³ <https://codes.findlaw.com/ca/public-resources-code/prc-sect-21155-2.html>

(a) A transit priority project that has incorporated all feasible mitigation measures, performance standards, or criteria set forth in the prior applicable environmental impact reports and adopted in findings made pursuant to [Section 21081](#), shall be eligible for either the provisions of subdivision (b) or (c).

(b) A transit priority project that satisfies the requirements of subdivision (a) may be reviewed through a sustainable communities environmental assessment as follows:

(1) An initial study shall be prepared to identify all significant or potentially significant impacts of the transit priority project, other than those which do not need to be reviewed pursuant to [Section 21159.28](#) based on substantial evidence in light of the whole record. The initial study shall identify any cumulative effects that have been adequately addressed and mitigated pursuant to the requirements of this division in prior applicable certified environmental impact reports. Where the lead agency determines that a cumulative effect has been adequately addressed and mitigated, that cumulative effect shall not be treated as cumulatively considerable for the purposes of this subdivision.

(2) The sustainable communities environmental assessment shall contain measures that either avoid or mitigate to a level of insignificance all potentially significant or significant effects of the project required to be identified in the initial study.

Figure 1 California Code, Public Resources Code - PRC § 21155.2

Thus, a project that has significant, or **potentially significant**, effects must be mitigated below the threshold of significance.

Conclusions

There are several errors and omissions in the SCEA noise analysis. Correcting these would potentially identify several significant impacts which require mitigation.

Please feel free to contact me with any questions on this information.

Very truly yours,

WILSON IHRIG

Jennifer Levins

Jennifer Levins
Senior Consultant



JENNIFER LEVINS

Senior Consultant

Jennifer joined the firm with over 15 years of experience in architectural acoustics. She has worked across the country from New York City to Los Angeles, and now is based in Seattle. She has consulted on a wide variety of projects including multi-family housing, private residential, commercial, educational, and performing arts centers. She completed original research on impact noise of floors, comparing partial vs. full installations. This was presented at the 2017 ASA conference in Boston.

Education

- BSE, University of Hartford, Acoustical Engineering and Music

Professional Associations / Licenses

- Acoustical Society of America (ASA)
-

Project Experience (*Prior to Joining Wilson Ihrig)

- *Clara Gardens, Santa Clara, CA*
- *Choice in Aging, Pleasant Hill, CA*
- *Lot 12, Mountain View, CA*
- *3050 International, Oakland, CA*
- *1868 Ogden, Burlingame, CA*
- *The Kelsey, San Francisco, CA*
- *TENTEN Hollywood*
- *Ivy Station, Culver City, CA**
- *Wilshire Gayley, Los Angeles, CA**
- *The Hoxton, Los Angeles, CA**
- *The Artise, Bellevue, WA**
- *Adaptive Biotechnologies, Seattle, WA**
- *Residential Property for a Confidential Developer, CA**
- *The Colony at Mandalay Beach, Oxnard, CA**
- *Sea Colony II, Santa Monica, CA**
- *45-47 Great Jones, New York, NY**
- *84 Field Point Circle, Greenwich, CT**
- *41° North Hotel, Newport, RI**
- *Shelter Haven, Stone Harbor, NJ**
- *Schaeffer Auditorium, Kutztown University, Kutztown, PA**
- *GlaxoSmithKline Radex Leadership Hub, Radnor, PA**
- *Lincoln University International Cultural Center, Lincoln, PA**
- *The Willow School, Gladstone, NJ**



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-2022-2279-TOC-SPR-VHCA

Project Address: 1022-1066 South La Cienega Boulevard

Final Date to Appeal: October 6, 2023

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
Friends of South Carthay

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: Friends of South Carthay

Company/Organization: _____

Mailing Address: 1068 Alvira St.

City: Los Angeles State: CA Zip: 90035

Telephone: (323) 385-3859 E-mail: ronsokoloff@ca.rr.com

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

Self Other: _____

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

4. REPRESENTATIVE/AGENT INFORMATION

Representative/Agent name (if applicable): Jamie T. Hall

Company: Channel Law Group, LLP

Mailing Address: 8383 Wilshire Blvd., Suite 750

City: Beverly Hills State: CA Zip: 90211

Telephone: (310) 347-0050 E-mail: jamie.hall@channellawgroup.com

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: _____

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: 10/2/2023

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 COMMUNITIES (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: \$166.00	Reviewed & Accepted by (DSC Planner): Steven Wechsler	Date: 10-5-23
Receipt No: 051023C29-750A80BE	Deemed Complete by (Project Planner):	Date:
<input checked="" type="checkbox"/> Determination authority notified		<input type="checkbox"/> Original receipt and BTC receipt (if original applicant)

DIR-2022-2279-TOC-SPR-VHCA-1A

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JULIAN K. QUATTLEBAUM, III
JAMIE T. HALL *
CHARLES J. McLURKIN

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jamie.hall@channellawgroup.com

*ALSO Admitted in Texas

October 4, 2023

VIA ELECTRONIC SUBMITTAL

Re: Appeal of Site Plan Review and Objection to Appeal Rejection at 1050 S. La Cienega Blvd.; DIR-2022-2279-TOC-SPR-VHCA; ENV-2022-2280-SCEA

This office represents Appellant Friends of South Carthay in its appeal of the Director of Planning's September 21, 2023 determination to approve Transit Oriented Communities ("TOC") incentives, to approve Site Plan Review and to determine that the Sustainable Communities Environmental Assessment ("SCEA") complies with the California Environmental Quality Act ("CEQA"). The Project proposes the construction of a 24-story, approximately 272 foot-high mixed-use building including three levels of above-grade podium parking with 297,680 square feet of Floor Area and a Floor Area Ratio of 3.75 to 1. This letter explains that the Director exceeded their authority, the findings for the two entitlements cannot be made and the SCEA is inadequate.

I. THE DIRECTOR GRANTED RELIEF IN EXCESS OF THEIR AUTHORITY

The Director of Planning ("Director") does not have plenary power to approve or modify projects. The powers of the Director are strictly limited to those enumerated in the City Charter or in ordinance. *Heap v. City of Los Angeles* (1936) 6.Cal.2d 405, 407. The Supreme Court rejected an argument that approval authority may be implied, highlighting the practical and political dangers of implied approval authority. *Id.* at pp. 407-08. Under Charter Section 553, the Director's authority is limited to preparing zoning and general plan amendments, investigating subdivisions and having "those additional powers and duties provided by ordinance."

The Director exceeded his authority by authorizing relief for modifications to Exhibit "A". Condition 1 provides:

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 Planning. Each change shall be identified and justified in writing.

First, *the Director has no authority to approve modifications to approved plans* such as those in Exhibit “A”. Condition 1 is a *limitation on a grant* and cannot be construed to grant the Director authority it does not possess by charter or ordinance: the authority to approve future modifications to approved plans. *Heap v. City of Los Angeles, supra*, Cal.2d 405, 407. The LAMC requires that TOC and Site Plan Review applications shall comply with Department of City Planning Forms.¹ The relevant forms here require the submission of site and elevation plans precisely defining the Project.² None of these documents authorize the Director to approve any modification to an approved Exhibit “A”. To the extent the Letter of Determination purports to authorize changes to approved plans without authorization in the City Charter or ordinance, it is void.³

Second, *a sentence in Condition 1 lacks a verb and is unconstitutionally vague*. Condition 1 provides: “Minor deviations may be allowed in order to comply with the provisions of the LAMC or the project conditions.” This sentence lacks a second verb which is essential to giving it effect, specifically a verb within the subordinate phrase “in order to [verb] the project conditions.” A literal reading of the grant clause lacks a grammatical component essential to its construction, leaving its readers grasping at meaning. The unusual construction and vagueness of Condition 1 renders it prone to abuse. Future City Planners, lacking a grammatically correct construction, might force the phrase “comply with” together with the prior prepositional phrase, thereby allowing deviations “in order to comply with the provisions of the LAMC or the project’s conditions.” Project conditions do not issue orders or mandate standards; they are exogenous conditions that do not create a need for regulatory compliance. This is a highly unnatural use of the phrase “comply with,” suggesting that the Director’s intent is not to pair it with the prior prepositional phrase. The Committee must amend this condition to complete the sentence and render it grammatically complete.

Third, the Director *exceeded their authority* by granting relief in the form of a final number of dwelling units (290), while adding that this increase was “equal to a density increase of 45 percent.” The Director is authorized to approve density at “rates that shall meet or exceed a

¹ LAMC §§ 12.22-A.31(e) (TOC) and 16.05-G.1 (Site Plan Review).

² Form CP-7771.1 (City Planning Application); Form CP-2152 (Site Plan Review Application); Form CP-2150 (Site Plan Review Supplemental Application); Form 7817 (Elevation Instructions).

³ LAMC § 11.02.

35% increase.”⁴ The Director is therefore required to express their grant as a rate (i.e., a percentage increase in density such as 45 percent) rather than approval of a total density number. The grant clause must be revised to authorize the density increase without reference to the final number of dwelling units permitted.

Finally, the Director *exceeded their authority* by authorizing the Project to obtain relief from parking regulations based on AB 2097 when that statute is not yet effective.

II. THE FINDINGS ARE IN ERROR

A. The Director Was Required to Disapprove the Requested Incentives

The TOC Incentives shall not be approved where the Director makes one of two findings identified in LAMC Section 12.22 A.25(g). Substantial evidence supports the first finding, that the “Incentive is not required in order to provide for affordable housing costs or rents.” The vague Conditions of Approval and the apparent grants of further relief within Condition 1.A provides substantial evidence that the Project could obtain additional relief within the terms of the Letter of Determination beyond that disclosed in Exhibit “A”. The scope of relief necessary to provide for affordable housing costs or rents is determined by the scope of relief approved in Exhibit “A” – the City has made an implied finding that further relief is “not required” and therefore it must deny the incentive.

Moreover, substantial evidence supports the second finding, that the Incentive “will have a specific adverse impact upon public health and safety or the physical environment[.]” Substantial evidence supports this finding as demonstrated below. The Commission therefore should grant the appeal and deny the height Incentive. Moreover, each of the procedural defects identified above establishes substantial evidence supporting the findings and requiring denial of the TOC incentive.

B. The Site Plan Review Findings Lack Substantial Evidence

Site Plan Review approval requires three findings identified in LAMC Section 16.05-F. These findings lack substantial evidence.

The project is in substantial conformance with the purposes, intent and provisions of the General Plan, applicable community plan, and does not conflict with any applicable regulations, standards, and any applicable specific plan.

This finding lacks substantial evidence because the Project does not comply with applicable zoning standards, relying on the TOC approval to exceed density and FAR limitations and to obtain relief from parking and yard requirements.

The project consists of an arrangement of buildings and structures (including height, bulk and setbacks), off-street parking facilities, loading areas, lighting,

⁴ LAMC Section 12.22-A.31(b)(2)(i).

landscaping, trash collection, and other such pertinent improvements that is or will be compatible with existing and future development on neighboring properties

This finding lacks substantial evidence because the conditions of approval contemplate that the Project would require no parking consistent with AB 2097, which is not effective at this date and therefore does not apply to the project. Yet, the findings do not contemplate the possibility that the Project would not provide its four-story parking podium, let alone substantiate how this is compatible with existing and future development on neighboring properties.

III. THE SCEA DOES NOT COMPLY WITH CEQA

A. The SCEA Lacks an Adequate Project Description and Setting

As noted in Appellant's October 21 and November 1, 2022 objection letters, and other letters submitted by the public, the SCEA is inadequate to comply with CEQA. The Project Description includes an inaccurate Environmental Setting in violation of CEQA Guidelines sections 15124 and 15125 because it misrepresents the proximity of adjacent development. The SCEA's Project Description also fails to describe existing noise, methane, dewatering and well abandonment project design features, interfering with the public's ability to discern the Project's unmitigated impacts and to identify the efficacy and feasibility of various mitigation measures.

B. The SCEA is Not Consistent with the RTP/SCS

The Project is not eligible for a SCEA because it is not consistent with the RTP/SCS as required by Public Resources Code section 21155. The proposed Project is not eligible for a SCEA because the Project contains too many residential units, is not 15 percent more energy efficient than required by Chapter 6 of Title 24 of the California Code of Regulations and the buildings and landscaping are not designed to achieve 25 percent less water usage than the average household use in the region, and the hazardous materials issues associated with the site have not been adequately mitigated. Therefore the Project is not eligible for a SCEA per Public Resources Code Section 21155.1. An EIR is therefore required for the proposed Project.

Given that the City's adopted Housing Element will result in growth in excess of that analyzed in the RTP/SCS, further exacerbated by recent State legislation such as SB9, SB10 and SB35, no project which results in additional density within the City of Los Angeles is consistent with the RTP/SCS, since it cannot be shown that the proposed Project in combination with the cumulative development resulting from implementation of the Housing Element and recent State laws will not exceed the SCS growth forecasts for the Project area. It therefore cannot be shown that the Project in combination with cumulative development is consistent with the general use designations, density, building intensity, and applicable policies specified for the project area in the strategy.

The SCEA fails to provide any specifics regarding the density and building intensity included in the RTP/SCS for the claimed three Priority Growth Areas. Consistency with the

density and intensity assumed in the RTP/SCS for the Project area has therefore not been demonstrated or supported by substantial evidence.

The RTP/SCS specifies that in High Quality Transit Areas (HQTAs): “Active transportation and new developments should be context sensitive, responding to the existing physical conditions of the surrounding area. Sensitively designed TODs can preserve existing development patterns and neighborhood character while providing a balance of modal and housing choices.” The height and density of the proposed Project is not context-sensitive to the adjacent National Register Historic District and HPOZ. The proposed Project would result in construction within 15-feet of historic structures and a 28-story high density building adjacent to a low-density historic neighborhood. The proposed Project is thus not consistent with the development objectives for HQTA’s in the RTP/SCS.

Similarly, the RTP/SCS specifies that Livable Corridors development result in context sensitive density stating: “The Livable Corridors strategy is comprised of three components that will encourage context sensitive density. . .” In failing to provide context sensitive density, the proposed Project is inconsistent with both the RTP/SCS’s HQTA and Livable Corridors strategies.

RTP/SCS Goal 2 – “Improve mobility, accessibility, reliability, and travel safety for people and goods.” The proposed Project would increase bicycle use in an area with insufficient bicycle infrastructure, exacerbating existing bicycle safety issues. In addition, the Project fails to provide a 15-foot sidewalk along the Project frontage as required in the City’s Mobility Element and will not result in the target level of pedestrian safety. The Project is therefore not consistent with RTP/SCS Goal 2.

Similarly, the Project is not consistent with RTP/SCS Guiding Principal 3 – “Assure that land use and growth strategies recognize local input, promote sustainable transportation options, and support equitable and adaptable communities.” The proposed Project is not consistent with the development objectives and definition of High Quality Transit Areas (HQTAs) or the Livable Corridors in the RTP/SCS, due to its failure to provide context sensitive density. Given the proposed Project’s excessive height and density in combination with its location immediately adjacent to an important single-family historic district, the proposed Project is thus not consistent with the density assumptions in the RTP/SCS which are based on context sensitive densities. Whether or not the project is consistent with some of the SCS policies is immaterial given that the proposed Project fails to meet the definition of either High Quality Transit Areas (HQTAs) or the Livable Corridors in the RTP/SCS.

The proposed Project is inconsistent with the RTP/SCS strategy of preserving and rehabilitating affordable housing and preventing displacement. The proposed Project may result in the displacement of residents of the Historic District and HPOZ who are bothered by the aesthetic and light and glare impacts of the project. To the degree that the Project makes the HPOZ area less desirable, it may hinder the rehabilitation and maintenance of these historic residences.

The Project is inconsistent with the RTP/SCS strategy of identifying ways to improve access to public park space. Project open space and landscaped areas are primarily for use by the tenants. Little public open space is provided and what is provided may not be readily apparent to nonresidents of the Project.

Section 4 of the SCEA identifies all of the mitigation measures contained in the Mitigation Monitoring and Reporting Program (MMRP) for SCAG's 2020-2045 RTP/SCS Program EIR and provides a discussion of the applicability of the mitigation measures to the Project. However, this is not sufficient to meet the requirements for use of an SCEA. PRC Section 211552(a) provides for use of a SCEA for: "(a) A transit priority project that has incorporated all feasible mitigation measures, performance standards, or criteria set forth in the prior applicable environmental impact reports and adopted in findings made pursuant to Section 21081 . . ."

The SCEA fails to demonstrate that the project has incorporated all feasible mitigation measures, performance standards, or criteria set forth in all of the prior applicable environmental impact reports including but not limited to the EIR's for: (1) the Wilshire Community Plan Update (SCH # 1997081033) Mobility Plan 2035 (SCH#2013041012); (2) the City's Mobility Element Update; and (3) the Housing Element 2021-2029 Update/Safety Element Update (SCH#20211010130).

The Project will result in aesthetic impacts on historic resources, and the City is required to consider aesthetic impacts to historic resources. The SCEA has failed to require compliance with RTP/SCS EIR Mitigation PMM AES-1, AES-2 and AES-3. The scale of the Project is clearly inconsistent with PMM AES-2 which requires minimizing the contrasts in scale and massing between projects and the surrounding development. In addition, given the Project's height and residential nature, it will result in light impacts on the adjacent Historic District and HPOZ, yet the SCEA does not require compliance with AES-3. The Project is thus not eligible for an SCEA.

There are a number of feasible mitigation measures from the RTP/SCS EIR which the SCEA says do not apply to the Project due to a lack of Project-specific impacts for those issue areas, however, that is not what is required by PRC Section 211552(a), which requires incorporation of all feasible mitigation measures, performance standards, or criteria set forth in the prior applicable environmental impact reports. The SCEA's failure to require compliance with all feasible RTP/SCS mitigation measures invalidates the SCEA. This includes failure to require demonstrated compliance with PMM AQ-1, BIO-1 to BIO-6, GEO-1, GHG-1, HAZ-1 to HAZ-7, HYD-1 to HYD-5, LU-2, MIN-1, Noise-1 to Noise-2, PSP-1, PSS-1, PSL-1, TRA-2, USWW-1, USWS-1, etc., without demonstrating that the Project will be required to comply with an equal or more effective measure that addresses all of the components of the RTP/SCS mitigation measure. In the case of measures such as biological resource mitigation measures where the resource of concern is not present on the Project site, compliance should be

demonstrated by documenting the lack of the resource as part of the mitigation monitoring process, but the mitigation must still apply.

C. The SCEA Fails to Identify Significant Impacts

The City erred and abused its discretion by finding that the SCEA identified all potentially significant impacts as required by Public Resources Code Section 21155.2, subdivision (b)(5)(A).

The SCEA erroneously asserts that the Project is immune from an analysis of aesthetic resource impacts, since it is located in proximity to historic resources. Goal 5 of the Wilshire Community Plan is to: provide sufficient open space in balance with development to serve the recreational, environmental, health and safety needs of the Wilshire Community Plan, and protect environmental and aesthetic resources. The Plan thus contains aesthetic resource goals.

D. The SCEA Fails to Identify Significant Project Impacts

The City erred and abused its discretion by finding that the SCEA identified all potentially significant impacts as required by Public Resources Code Section 21155.2, subdivision (b)(5)(A). The SCEA fails to characterize anticipated light spillage from all of the apartments in the tower. The SCEA needs to fully disclose the likely light visibility of the Project.

With respect to energy impacts, CEQA Guidelines § 15126.2(b) requires that an environmental review document consider “the project's energy use for all project phases and components, including transportation-related energy, during construction and operation” to assess whether a project will result in wasteful, inefficient, or unnecessary consumption of energy. As noted in the SCEA, analysis to determine whether a project will result in wasteful, inefficient, or unnecessary consumption of energy should include “[t]he project’s energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project” (emphasis added). Similarly, for utility impacts, the SCEA requires consideration of whether the Project will “result in the relocation or construction of new or expanded. . . electrical power [and] natural gas” facilities.

Here, the SCEA does not even attempt to quantify the Project’s estimated energy consumption during its construction phase. This is particularly disconcerting given that the SCEA estimates that the construction phase is expected to last about 32 months, i.e. over two years. Instead, the SCEA blanketly asserts that “[o]verall, construction activities associated with the Project would require limited electricity generation that would not be expected to have an adverse impact on available electricity supplies.” Thus, the SCEA places the cart before the horse in speculating that the Project’s energy and utility impacts will be less than significant without even assessing the Project’s anticipated construction related energy consumption. Without such analysis and information, the SCEA’s less than significant findings are no more than speculative.

The SCEA failed to identify potentially significant public hazard impacts from COVID-19 exposure. Construction work has been defined as a Lower to High-risk activity for COVID-19 spread by the Occupations Safety and Health Administration. Recently, several construction sites have been identified as sources of community spread of COVID-19.

The SCEA failed to adequately analyze cumulative impacts on climate change other than from vehicles and cumulative impacts on transportation. The SCEA fails to analyze the potential cumulative aesthetic impacts of the proposed Project and related Projects on the Historic District and the HPOZs.

The cumulative impacts analysis is inadequate. As explained in SCEA Section 2.5, the analysis only addresses “reasonably foreseeable related projects within a 0.5-mile radius of the Project Site.” The SCEA fails to provide a rationale for limiting the analysis to only projects within a 0.5-mile radius of the Project Site, particularly given that one of the issues is potential cumulative impacts to an Historic District. This does not comply with CEQA Guidelines Section 15130 (b)(2) and (3) which specifies:

(2) When utilizing a list, as suggested in paragraph (1) of subdivision (b), factors to consider when determining whether to include a related project should include the nature of each environmental resource being examined, the location of the project and its type. Location may be important, for example, when water quality impacts are at issue since projects outside the watershed would probably not contribute to a cumulative effect. Project type may be important, for example, when the impact is specialized, such as a particular air pollutant or mode of traffic.

(3) Lead agencies should define the geographic scope of the area affected by the cumulative effect and provide a reasonable explanation for the geographic limitation used.

E. The SCEA Fails to Adequately Mitigate Potentially Significant Impacts

The City erred and abused its discretion by finding that the SCEA adopted all feasible mitigation measures for significant impacts as required by Public Resources Code Section 21155.2, subdivision (b)(5)(B).

The SCEA failed to adopt sufficient mitigation measures to reduce significant impacts to historic resources to less-than-significant levels including reduction in mass and additional setbacks.

The SCEA improperly defers mitigation of TPH-gasoline and VOC impacts. First, although the SCEA provides that “[b]ased on the groundwater data, the groundwater at the Site is impacted with constituents associated with gas stations (TPH-gasoline, benzene, ethylbenzene)”, it defers the measures it implements to mitigate such impacts. Specifically, the SCEA implements mitigation measures such as requiring a soil management plan (“SMP”) and

retention of a dewatering contractor. With regard to the SMP (MM-HAZ-1), the SCEA provides that it will be prepared at some unspecified time in the future by an unspecified and yet to be determined environmental consultant. Similarly, for the dewatering contractor (MM-HAZ-2), the SCEA confirms that such contractor has yet to be retained, fails to provide required qualifications for the contractor, and fails to provide design specifications. The SCEA does not specify why it is infeasible to prepare these plans before Project approval.

Moreover methane mitigation has been improperly deferred and methane impacts insufficiently analyzed.

In light of these deficiencies, the Project's hazardous material impacts are not truly mitigated, rendering the Project ineligible for SCEA review in the first place. See PRC section 21155.1(a)(4)(B) [holding that a project is only eligible for SCEA review if "a potential for exposure to significant hazards from surrounding properties or activities. . . [is] mitigated to a level of insignificance"]. Thus, in addition to needing to rectify its mitigation measures, a full EIR should be prepared for the Project since it does not comply with all of the SCEA eligibility requirements.

The SCEA's noise mitigation measures, implemented to mitigate the Project's significant noise levels on nearby sensitive receptors such as a temple, school, park, senior living community, and residences, are ineffective and improperly deferred. For example, the SCEA implements MM-NOI-1 to require sound barriers along the Project's eastern boundary which are "to achieve a sound attenuation of at least 15 dBA" and which shall be "a minimum of 20 feet in height." Similarly, the SCEA implements MM-NOI-3 to require sound barriers along the Project's western boundary which are also "to achieve a sound attenuation of at least 15 dBA" and which shall be "a minimum of 7 feet in height."

However, assuming the barriers sit on the ground at the perimeter of the Project, the barriers would not adequately mitigate noise sources elevated above the ground level as construction of the building progresses. The mitigation measures must be revised to fully explain how noise barriers would be used to mitigate noise impacts at a minimum of 15 dBA for elevated sources during construction of the twenty eight-story building. The SCEA does not specify why it is infeasible to prepare these plans before Project approval.

To "ensure that the Project's construction does not expose South Alfred Street Residences and a commercial building at 1080 La Cienega Boulevard to potentially damaging levels of groundborne vibration", the SCEA implements a number of mitigation measures such as requiring a pre-construction survey to be performed and implementation of a groundborne vibration and structural/architectural monitoring program (MM-NOI-10). However, the SCEA notes that such preconstruction surveys have yet to be prepared rendering it impossible to determine the feasibility of mitigating vibration impacts to historic structures. The SCEA does not specify why it is infeasible to prepare these plans before Project approval.

The SCEA failed to require a local hire program to mitigate greenhouse gas and air quality impacts as recommended by SWAPE report.

The SCEA also improperly defers its transportation project design feature, a mitigation measure in essence designed to “ensure that adequate emergency access exists during construction.” The SCEA provides that “[p]rior to the start of construction, the Project Applicant shall prepare a detailed Construction Traffic Management Plan (CTMP), including street closure information, detour plans, haul routes, and staging plans, and submit it to LADOT for review and approval” (emphasis added). Thus, the SCEA’s transportation mitigation measure is similarly deferred as the plan has yet to be prepared nor circulated for public review and comment.

IV. CONCLUSION

On behalf of Friends of South Carthay, we respectfully request that you grant the appeal, deny the Entitlements or require revision and recirculation of the SCEA. I may be reached at 310-982-1760 or jamie.hall@channellawgroup.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Jamie T. Hall". The signature is fluid and cursive, with the first name "Jamie" being the most prominent part.

Jamie T. Hall



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-2022-2279-TOC-SPR-VHCA

Project Address: 1022-1066 South La Cienega Boulevard

Final Date to Appeal: 10/06/2023

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

Andrew Marton

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: Andrew Marton

Company/Organization: _____

Mailing Address: 1077 S. Alfred St.

City: Los Angeles State: CA Zip: 90035

Telephone: (310) 936-6280 E-mail: ajmarton@ca.rr.com

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

Self Other: _____

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: _____

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: Andrew Marton Date: October 2, 2023

Marton
Date: 2023.10.02 17:59:55
-07'00'

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: \$166.00	Reviewed & Accepted by (DSC Planner): Steven Wechsler <i>[Signature]</i>	Date: 10-5-23
Receipt No: 05102302C-5632886A	Deemed Complete by (Project Planner):	Date:
<input checked="" type="checkbox"/> Determination authority notified		<input type="checkbox"/> Original receipt and BTC receipt (if original applicant)

Justifications for Appeal

Re: Appeal of Site Plan Review and Objection to Appeal Rejection at 1050 S. La Cienega Blvd.; DIR-2022-2279-TOC-SPR-VHCA; ENV-2022-2280-SCEA

I have drafted these Justifications for Appeal related to the Director of Planning’s September 21, 2023 determination to approve Transit Oriented Communities (“TOC”) incentives, to approve Site Plan Review and to determine that the Sustainable Communities Environmental Assessment (“SCEA”) complies with the California Environmental Quality Act (“CEQA”). The Project proposes the construction of a 24-story, approximately 272 foot-high mixed-use building including three levels of above-grade podium parking with 297,680 square feet of Floor Area and a Floor Area Ratio of 3.75 to 1. As explained below, the Director exceeded his authority, the findings for the two entitlements cannot be made and the SCEA is inadequate.

I. THE DIRECTOR GRANTED RELIEF IN EXCESS OF THEIR AUTHORITY

The Director of Planning (“Director”) does not have plenary power to approve or modify projects. The powers of the Director are strictly limited to those enumerated in the City Charter or in ordinance. *Heap v. City of Los Angeles* (1936) 6.Cal.2d 405, 407. The Supreme Court rejected an argument that approval authority may be implied, highlighting the practical and political dangers of implied approval authority. *Id.* at pp. 407-08. Under Charter Section 553, the Director’s authority is limited to preparing zoning and general plan amendments, investigating subdivisions and having “those additional powers and duties provided by ordinance.”

The Director exceeded his authority by authorizing relief for modifications to Exhibit “A”. Condition 1 provides:

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 Planning. Each change shall be identified and justified in writing.

First, *the Director has no authority to approve modifications to approved plans* such as those in Exhibit “A”. Condition 1 is a *limitation on a grant* and cannot be construed to grant the Director authority it does not possess by charter or ordinance: the authority to approve future modifications to approved plans. *Heap v. City of Los Angeles, supra*, Cal.2d 405, 407. The LAMC requires that TOC and Site Plan Review applications shall comply with Department of

City Planning Forms.¹ The relevant forms here require the submission of site and elevation plans precisely defining the Project.² None of these documents authorize the Director to approve any modification to an approved Exhibit “A”. To the extent the Letter of Determination purports to authorize changes to approved plans without authorization in the City Charter or ordinance, it is void.³

Second, *a sentence in Condition 1 lacks a verb and is unconstitutionally vague*. Condition 1 provides: “Minor deviations may be allowed in order to comply with the provisions of the LAMC or the project conditions.” This sentence lacks a second verb which is essential to giving it effect, specifically a verb within the subordinate phrase “in order to [verb] the project conditions.” A literal reading of the grant clause lacks a grammatical component essential to its construction, leaving its readers grasping at meaning. The unusual construction and vagueness of Condition 1 renders it prone to abuse. Future City Planners, lacking a grammatically correct construction, might force the phrase “comply with” together with the prior prepositional phrase, thereby allowing deviations “in order to comply with the provisions of the LAMC or the project’s conditions.” Project conditions do not issue orders or mandate standards; they are exogenous conditions that do not create a need for regulatory compliance. This is a highly unnatural use of the phrase “comply with,” suggesting that the Director’s intent is not to pair it with the prior prepositional phrase. The Committee must amend this condition to complete the sentence and render it grammatically complete.

Third, the Director *exceeded their authority* by granting relief in the form of a final number of dwelling units (290), while adding that this increase was “equal to a density increase of 45 percent.” The Director is authorized to approve density at “rates that shall meet or exceed a 35% increase.”⁴ The Director is therefore required to express their grant as a rate (i.e., a percentage increase in density such as 45 percent) rather than approval of a total density number. The grant clause must be revised to authorize the density increase without reference to the final number of dwelling units permitted.

Finally, the Director *exceeded their authority* by authorizing the Project to obtain relief from parking regulations based on AB 2097 when that statute is not yet effective.

II. THE FINDINGS ARE IN ERROR

A. The Director Was Required to Disapprove the Requested Incentives

The TOC Incentives shall not be approved where the Director makes one of two findings identified in LAMC Section 12.22 A.25(g). Substantial evidence supports the first finding, that the “Incentive is not required in order to provide for affordable housing costs or rents.” The

¹ LAMC §§ 12.22-A.31(e) (TOC) and 16.05-G.1 (Site Plan Review).

² Form CP-7771.1 (City Planning Application); Form CP-2152 (Site Plan Review Application); Form CP-2150 (Site Plan Review Supplemental Application); Form 7817 (Elevation Instructions).

³ LAMC § 11.02.

⁴ LAMC Section 12.22-A.31(b)(2)(i).

vague Conditions of Approval and the apparent grants of further relief within Condition 1.A provides substantial evidence that the Project could obtain additional relief within the terms of the Letter of Determination beyond that disclosed in Exhibit “A”. The scope of relief necessary to provide for affordable housing costs or rents is determined by the scope of relief approved in Exhibit “A” – the City has made an implied finding that further relief is “not required” and therefore it must deny the incentive.

Moreover, substantial evidence supports the second finding, that the Incentive “will have a specific adverse impact upon public health and safety or the physical environment[.]” Substantial evidence supports this finding as demonstrated below. The Commission therefore should grant the appeal and deny the height Incentive. Moreover, each of the procedural defects identified above establishes substantial evidence supporting the findings and requiring denial of the TOC incentive.

B. The Site Plan Review Findings Lack Substantial Evidence

Site Plan Review approval requires three findings identified in LAMC Section 16.05-F. These findings lack substantial evidence.

The project is in substantial conformance with the purposes, intent and provisions of the General Plan, applicable community plan, and does not conflict with any applicable regulations, standards, and any applicable specific plan.

This finding lacks substantial evidence because the Project does not comply with applicable zoning standards, relying on the TOC approval to exceed density and FAR limitations and to obtain relief from parking and yard requirements.

The project consists of an arrangement of buildings and structures (including height, bulk and setbacks), off-street parking facilities, loading areas, lighting, landscaping, trash collection, and other such pertinent improvements that is or will be compatible with existing and future development on neighboring properties

This finding lacks substantial evidence because the conditions of approval contemplate that the Project would require no parking consistent with AB 2097, which is not effective at this date and therefore does not apply to the project. Yet, the findings do not contemplate the possibility that the Project would not provide its four-story parking podium, let alone substantiate how this is compatible with existing and future development on neighboring properties.

III. THE SCEA DOES NOT COMPLY WITH CEQA

A. The SCEA Lacks an Adequate Project Description and Setting

As noted in Appellant’s October 21 and November 1, 2022 objection letters, and other letters submitted by the public, the SCEA is inadequate to comply with CEQA. The Project Description includes an inaccurate Environmental Setting in violation of CEQA Guidelines sections 15124 and 15125 because it misrepresents the proximity of adjacent development. The

SCEA's Project Description also fails to describe existing noise, methane, dewatering and well abandonment project design features, interfering with the public's ability to discern the Project's unmitigated impacts and to identify the efficacy and feasibility of various mitigation measures.

B. The SCEA is Not Consistent with the RTP/SCS

The Project is not eligible for a SCEA because it is not consistent with the RTP/SCS as required by Public Resources Code section 21155. The proposed Project is not eligible for a SCEA because the Project contains too many residential units, is not 15 percent more energy efficient than required by Chapter 6 of Title 24 of the California Code of Regulations and the buildings and landscaping are not designed to achieve 25 percent less water usage than the average household use in the region, and the hazardous materials issues associated with the site have not been adequately mitigated. Therefore the Project is not eligible for a SCEA per Public Resources Code Section 21155.1. An EIR is therefore required for the proposed Project.

Given that the City's adopted Housing Element will result in growth in excess of that analyzed in the RTP/SCS, further exacerbated by recent State legislation such as SB9, SB10 and SB35, no project which results in additional density within the City of Los Angeles is consistent with the RTP/SCS, since it cannot be shown that the proposed Project in combination with the cumulative development resulting from implementation of the Housing Element and recent State laws will not exceed the SCS growth forecasts for the Project area. It therefore cannot be shown that the Project in combination with cumulative development is consistent with the general use designations, density, building intensity, and applicable policies specified for the project area in the strategy.

The SCEA fails to provide any specifics regarding the density and building intensity included in the RTP/SCS for the claimed three Priority Growth Areas. Consistency with the density and intensity assumed in the RTP/SCS for the Project area has therefore not been demonstrated or supported by substantial evidence.

The RTP/SCS specifies that in High Quality Transit Areas (HQTAs): "Active transportation and new developments should be context sensitive, responding to the existing physical conditions of the surrounding area. Sensitively designed TODs can preserve existing development patterns and neighborhood character while providing a balance of modal and housing choices." The height and density of the proposed Project is not context-sensitive to the adjacent National Register Historic District and HPOZ. The proposed Project would result in construction within 15-feet of historic structures and a 28-story high density building adjacent to a low-density historic neighborhood. The proposed Project is thus not consistent with the development objectives for HQTA's in the RTP/SCS.

Similarly, the RTP/SCS specifies that Livable Corridors development result in context sensitive density stating: "The Livable Corridors strategy is comprised of three components that will encourage context sensitive density. . ." In failing to provide context sensitive density, the

proposed Project is inconsistent with both the RTP/SCS's HQTAs and Livable Corridors strategies.

RTP/SCS Goal 2 – “Improve mobility, accessibility, reliability, and travel safety for people and goods.” The proposed Project would increase bicycle use in an area with insufficient bicycle infrastructure, exacerbating existing bicycle safety issues. In addition, the Project fails to provide a 15-foot sidewalk along the Project frontage as required in the City's Mobility Element and will not result in the target level of pedestrian safety. The Project is therefore not consistent with RTP/SCS Goal 2.

Similarly, the Project is not consistent with RTP/SCS Guiding Principal 3 – “Assure that land use and growth strategies recognize local input, promote sustainable transportation options, and support equitable and adaptable communities.” The proposed Project is not consistent with the development objectives and definition of High Quality Transit Areas (HQTAs) or the Livable Corridors in the RTP/SCS, due to its failure to provide context sensitive density. Given the proposed Project's excessive height and density in combination with its location immediately adjacent to an important single-family historic district, the proposed Project is thus not consistent with the density assumptions in the RTP/SCS which are based on context sensitive densities. Whether or not the project is consistent with some of the SCS policies is immaterial given that the proposed Project fails to meet the definition of either High Quality Transit Areas (HQTAs) or the Livable Corridors in the RTP/SCS.

The proposed Project is inconsistent with the RTP/SCS strategy of preserving and rehabilitating affordable housing and preventing displacement. The proposed Project may result in the displacement of residents of the Historic District and HPOZ who are bothered by the aesthetic and light and glare impacts of the project. To the degree that the Project makes the HPOZ area less desirable, it may hinder the rehabilitation and maintenance of these historic residences.

The Project is inconsistent with the RTP/SCS strategy of identifying ways to improve access to public park space. Project open space and landscaped areas are primarily for use by the tenants. Little public open space is provided and what is provided may not be readily apparent to nonresidents of the Project.

Section 4 of the SCEA identifies all of the mitigation measures contained in the Mitigation Monitoring and Reporting Program (MMRP) for SCAG's 2020-2045 RTP/SCS Program EIR and provides a discussion of the applicability of the mitigation measures to the Project. However, this is not sufficient to meet the requirements for use of an SCEA. PRC Section 211552(a) provides for use of a SCEA for: “(a) A transit priority project that has incorporated all feasible mitigation measures, performance standards, or criteria set forth in the prior applicable environmental impact reports and adopted in findings made pursuant to Section 21081 . . .”

The SCEA fails to demonstrate that the project has incorporated all feasible mitigation measures, performance standards, or criteria set forth in all of the prior applicable environmental impact reports including but not limited to the EIR's for: (1) the Wilshire Community Plan Update (SCH # 1997081033) Mobility Plan 2035 (SCH#2013041012); (2) the City's Mobility Element Update; and (3) the Housing Element 2021-2029 Update/Safety Element Update (SCH#20211010130).

The Project will result in aesthetic impacts on historic resources, and the City is required to consider aesthetic impacts to historic resources. The SCEA has failed to require compliance with RTP/SCS EIR Mitigation PMM AES-1, AES-2 and AES-3. The scale of the Project is clearly inconsistent with PMM AES-2 which requires minimizing the contrasts in scale and massing between projects and the surrounding development. In addition, given the Project's height and residential nature, it will result in light impacts on the adjacent Historic District and HPOZ, yet the SCEA does not require compliance with AES-3. The Project is thus not eligible for an SCEA.

There are a number of feasible mitigation measures from the RTP/SCS EIR which the SCEA says do not apply to the Project due to a lack of Project-specific impacts for those issue areas, however, that is not what is required by PRC Section 211552(a), which requires incorporation of all feasible mitigation measures, performance standards, or criteria set forth in the prior applicable environmental impact reports. The SCEA's failure to require compliance with all feasible RTP/SCS mitigation measures invalidates the SCEA. This includes failure to require demonstrated compliance with PMM AQ-1, BIO-1 to BIO-6, GEO-1, GHG-1, HAZ-1 to HAZ-7, HYD-1 to HYD-5, LU-2, MIN-1, Noise-1 to Noise-2, PSP-1, PSS-1, PSL-1, TRA-2, USWW-1, USWS-1, etc., without demonstrating that the Project will be required to comply with an equal or more effective measure that addresses all of the components of the RTP/SCS mitigation measure. In the case of measures such as biological resource mitigation measures where the resource of concern is not present on the Project site, compliance should be demonstrated by documenting the lack of the resource as part of the mitigation monitoring process, but the mitigation must still apply.

C. The SCEA Fails to Identify Significant Impacts

The City erred and abused its discretion by finding that the SCEA identified all potentially significant impacts as required by Public Resources Code Section 21155.2, subdivision (b)(5)(A).

The SCEA erroneously asserts that the Project is immune from an analysis of aesthetic resource impacts, since it is located in proximity to historic resources. Goal 5 of the Wilshire Community Plan is to: provide sufficient open space in balance with development to serve the recreational, environmental, health and safety needs of the Wilshire Community Plan, and protect environmental and aesthetic resources. The Plan thus contains aesthetic resource goals.

D. The SCEA Fails to Identify Significant Project Impacts

The City erred and abused its discretion by finding that the SCEA identified all potentially significant impacts as required by Public Resources Code Section 21155.2, subdivision (b)(5)(A). The SCEA fails to characterize anticipated light spillage from all of the apartments in the tower. The SCEA needs to fully disclose the likely light visibility of the Project.

With respect to energy impacts, CEQA Guidelines § 15126.2(b) requires that an environmental review document consider “the project's energy use for all project phases and components, including transportation-related energy, during construction and operation” to assess whether a project will result in wasteful, inefficient, or unnecessary consumption of energy. As noted in the SCEA, analysis to determine whether a project will result in wasteful, inefficient, or unnecessary consumption of energy should include “[t]he project’s energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project” (emphasis added). Similarly, for utility impacts, the SCEA requires consideration of whether the Project will “result in the relocation or construction of new or expanded. . . electrical power [and] natural gas” facilities.

Here, the SCEA does not even attempt to quantify the Project’s estimated energy consumption during its construction phase. This is particularly disconcerting given that the SCEA estimates that the construction phase is expected to last about 32 months, i.e. over two years. Instead, the SCEA blanketly asserts that “[o]verall, construction activities associated with the Project would require limited electricity generation that would not be expected to have an adverse impact on available electricity supplies.” Thus, the SCEA places the cart before the horse in speculating that the Project’s energy and utility impacts will be less than significant without even assessing the Project’s anticipated construction related energy consumption. Without such analysis and information, the SCEA’s less than significant findings are no more than speculative.

The SCEA failed to identify potentially significant public hazard impacts from COVID-19 exposure. Construction work has been defined as a Lower to High-risk activity for COVID-19 spread by the Occupational Safety and Health Administration. Recently, several construction sites have been identified as sources of community spread of COVID-19.

The SCEA failed to adequately analyze cumulative impacts on climate change other than from vehicles and cumulative impacts on transportation. The SCEA fails to analyze the potential cumulative aesthetic impacts of the proposed Project and related Projects on the Historic District and the HPOZs.

The cumulative impacts analysis is inadequate. As explained in SCEA Section 2.5, the analysis only addresses “reasonably foreseeable related projects within a 0.5-mile radius of the Project Site.” The SCEA fails to provide a rationale for limiting the analysis to only projects within a 0.5-mile radius of the Project Site, particularly given that one of the issues is potential

cumulative impacts to an Historic District. This does not comply with CEQA Guidelines Section 15130 (b)(2) and (3) which specifies:

(2) When utilizing a list, as suggested in paragraph (1) of subdivision (b), factors to consider when determining whether to include a related project should include the nature of each environmental resource being examined, the location of the project and its type. Location may be important, for example, when water quality impacts are at issue since projects outside the watershed would probably not contribute to a cumulative effect. Project type may be important, for example, when the impact is specialized, such as a particular air pollutant or mode of traffic.

(3) Lead agencies should define the geographic scope of the area affected by the cumulative effect and provide a reasonable explanation for the geographic limitation used.

E. The SCEA Fails to Adequately Mitigate Potentially Significant Impacts

The City erred and abused its discretion by finding that the SCEA adopted all feasible mitigation measures for significant impacts as required by Public Resources Code Section 21155.2, subdivision (b)(5)(B).

The SCEA failed to adopt sufficient mitigation measures to reduce significant impacts to historic resources to less-than-significant levels including reduction in mass and additional setbacks.

The SCEA improperly defers mitigation of TPH-gasoline and VOC impacts. First, although the SCEA provides that “[b]ased on the groundwater data, the groundwater at the Site is impacted with constituents associated with gas stations (TPH-gasoline, benzene, ethylbenzene)”, it defers the measures it implements to mitigate such impacts. Specifically, the SCEA implements mitigation measures such as requiring a soil management plan (“SMP”) and retention of a dewatering contractor. With regard to the SMP (MM-HAZ-1), the SCEA provides that it will be prepared at some unspecified time in the future by an unspecified and yet to be determined environmental consultant. Similarly, for the dewatering contractor (MM-HAZ-2), the SCEA confirms that such contractor has yet to be retained, fails to provide required qualifications for the contractor, and fails to provide design specifications. The SCEA does not specify why it is infeasible to prepare these plans before Project approval.

Moreover methane mitigation has been improperly deferred and methane impacts insufficiently analyzed.

In light of these deficiencies, the Project’s hazardous material impacts are not truly mitigated, rendering the Project ineligible for SCEA review in the first place. See PRC section 21155.1(a)(4)(B) [holding that a project is only eligible for SCEA review if “a potential for exposure to significant hazards from surrounding properties or activities. . . [is] mitigated to a

level of insignificance”]. Thus, in addition to needing to rectify its mitigation measures, a full EIR should be prepared for the Project since it does not comply with all of the SCEA eligibility requirements.

The SCEA’s noise mitigation measures, implemented to mitigate the Project’s significant noise levels on nearby sensitive receptors such as a temple, school, park, senior living community, and residences, are ineffective and improperly deferred. For example, the SCEA implements MM-NOI-1 to require sound barriers along the Project’s eastern boundary which are “to achieve a sound attenuation of at least 15 dBA” and which shall be “a minimum of 20 feet in height.” Similarly, the SCEA implements MM-NOI-3 to require sound barriers along the Project’s western boundary which are also “to achieve a sound attenuation of at least 15 dBA” and which shall be “a minimum of 7 feet in height.”

However, assuming the barriers sit on the ground at the perimeter of the Project, the barriers would not adequately mitigate noise sources elevated above the ground level as construction of the building progresses. The mitigation measures must be revised to fully explain how noise barriers would be used to mitigate noise impacts at a minimum of 15 dBA for elevated sources during construction of the twenty eight-story building. The SCEA does not specify why it is infeasible to prepare these plans before Project approval.

To “ensure that the Project’s construction does not expose South Alfred Street Residences and a commercial building at 1080 La Cienega Boulevard to potentially damaging levels of groundborne vibration”, the SCEA implements a number of mitigation measures such as requiring a pre-construction survey to be performed and implementation of a groundborne vibration and structural/architectural monitoring program (MM-NOI-10). However, the SCEA notes that such preconstruction surveys have yet to be prepared rendering it impossible to determine the feasibility of mitigating vibration impacts to historic structures. The SCEA does not specify why it is infeasible to prepare these plans before Project approval.

The SCEA failed to require a local hire program to mitigate greenhouse gas and air quality impacts as recommended by SWAPE report.

The SCEA also improperly defers its transportation project design feature, a mitigation measure in essence designed to “ensure that adequate emergency access exists during construction.” The SCEA provides that “[p]rior to the start of construction, the Project Applicant shall prepare a detailed Construction Traffic Management Plan (CTMP), including street closure information, detour plans, haul routes, and staging plans, and submit it to LADOT for review and approval” (emphasis added). Thus, the SCEA’s transportation mitigation measure is similarly deferred as the plan has yet to be prepared nor circulated for public review and comment.

IV. CONCLUSION

I respectfully request that you grant the appeal, deny the Entitlements or require recirculation of the EIR.



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-2022-2279-TOC-SPR-VHCA

Project Address: 1022-1066 South La Cienega Boulevard

Final Date to Appeal: October 6, 2023

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
Elana Shrira

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: Elana Shrira

Company/Organization: _____

Mailing Address: 1053 S Alfred Street

City: Los Angeles State: CA Zip: 90035

Telephone: (310) 770-9686 E-mail: bermanshrira@att.net

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

Self Other: _____

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: _____

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: 10/2/2023

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: \$166	Reviewed & Accepted by (DSC Planner): Ruben Vasquez	Date: October 5, 2023
Receipt No: 051023O10-89DF44A0-7E78-4E20- AB98-97F44F406C75	Deemed Complete by (Project Planner):	Date:
<input type="checkbox"/> Determination authority notified		<input type="checkbox"/> Original receipt and BTC receipt (if original applicant)

Justifications for Appeal

Re: Appeal of Site Plan Review and Objection to Appeal Rejection at 1050 S. La Cienega Blvd.; DIR-2022-2279-TOC-SPR-VHCA; ENV-2022-2280-SCEA

I have drafted these Justifications for Appeal related to the Director of Planning’s September 21, 2023 determination to approve Transit Oriented Communities (“TOC”) incentives, to approve Site Plan Review and to determine that the Sustainable Communities Environmental Assessment (“SCEA”) complies with the California Environmental Quality Act (“CEQA”). The Project proposes the construction of a 24-story, approximately 272 foot-high mixed-use building including three levels of above-grade podium parking with 297,680 square feet of Floor Area and a Floor Area Ratio of 3.75 to 1. As explained below, the Director exceeded his authority, the findings for the two entitlements cannot be made and the SCEA is inadequate.

I. THE DIRECTOR GRANTED RELIEF IN EXCESS OF THEIR AUTHORITY

The Director of Planning (“Director”) does not have plenary power to approve or modify projects. The powers of the Director are strictly limited to those enumerated in the City Charter or in ordinance. *Heap v. City of Los Angeles* (1936) 6.Cal.2d 405, 407. The Supreme Court rejected an argument that approval authority may be implied, highlighting the practical and political dangers of implied approval authority. *Id.* at pp. 407-08. Under Charter Section 553, the Director’s authority is limited to preparing zoning and general plan amendments, investigating subdivisions and having “those additional powers and duties provided by ordinance.”

The Director exceeded his authority by authorizing relief for modifications to Exhibit “A”. Condition 1 provides:

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 Planning. Each change shall be identified and justified in writing.

First, *the Director has no authority to approve modifications to approved plans* such as those in Exhibit “A”. Condition 1 is a *limitation on a grant* and cannot be construed to grant the Director authority it does not possess by charter or ordinance: the authority to approve future modifications to approved plans. *Heap v. City of Los Angeles, supra*, Cal.2d 405, 407. The LAMC requires that TOC and Site Plan Review applications shall comply with Department of

City Planning Forms.¹ The relevant forms here require the submission of site and elevation plans precisely defining the Project.² None of these documents authorize the Director to approve any modification to an approved Exhibit “A”. To the extent the Letter of Determination purports to authorize changes to approved plans without authorization in the City Charter or ordinance, it is void.³

Second, *a sentence in Condition 1 lacks a verb and is unconstitutionally vague*. Condition 1 provides: “Minor deviations may be allowed in order to comply with the provisions of the LAMC or the project conditions.” This sentence lacks a second verb which is essential to giving it effect, specifically a verb within the subordinate phrase “in order to [verb] the project conditions.” A literal reading of the grant clause lacks a grammatical component essential to its construction, leaving its readers grasping at meaning. The unusual construction and vagueness of Condition 1 renders it prone to abuse. Future City Planners, lacking a grammatically correct construction, might force the phrase “comply with” together with the prior prepositional phrase, thereby allowing deviations “in order to comply with the provisions of the LAMC or the project’s conditions.” Project conditions do not issue orders or mandate standards; they are exogenous conditions that do not create a need for regulatory compliance. This is a highly unnatural use of the phrase “comply with,” suggesting that the Director’s intent is not to pair it with the prior prepositional phrase. The Committee must amend this condition to complete the sentence and render it grammatically complete.

Third, the Director *exceeded their authority* by granting relief in the form of a final number of dwelling units (290), while adding that this increase was “equal to a density increase of 45 percent.” The Director is authorized to approve density at “rates that shall meet or exceed a 35% increase.”⁴ The Director is therefore required to express their grant as a rate (i.e., a percentage increase in density such as 45 percent) rather than approval of a total density number. The grant clause must be revised to authorize the density increase without reference to the final number of dwelling units permitted.

Finally, the Director *exceeded their authority* by authorizing the Project to obtain relief from parking regulations based on AB 2097 when that statute is not yet effective.

II. THE FINDINGS ARE IN ERROR

A. The Director Was Required to Disapprove the Requested Incentives

The TOC Incentives shall not be approved where the Director makes one of two findings identified in LAMC Section 12.22 A.25(g). Substantial evidence supports the first finding, that the “Incentive is not required in order to provide for affordable housing costs or rents.” The

¹ LAMC §§ 12.22-A.31(e) (TOC) and 16.05-G.1 (Site Plan Review).

² Form CP-7771.1 (City Planning Application); Form CP-2152 (Site Plan Review Application); Form CP-2150 (Site Plan Review Supplemental Application); Form 7817 (Elevation Instructions).

³ LAMC § 11.02.

⁴ LAMC Section 12.22-A.31(b)(2)(i).

vague Conditions of Approval and the apparent grants of further relief within Condition 1.A provides substantial evidence that the Project could obtain additional relief within the terms of the Letter of Determination beyond that disclosed in Exhibit “A”. The scope of relief necessary to provide for affordable housing costs or rents is determined by the scope of relief approved in Exhibit “A” – the City has made an implied finding that further relief is “not required” and therefore it must deny the incentive.

Moreover, substantial evidence supports the second finding, that the Incentive “will have a specific adverse impact upon public health and safety or the physical environment[.]” Substantial evidence supports this finding as demonstrated below. The Commission therefore should grant the appeal and deny the height Incentive. Moreover, each of the procedural defects identified above establishes substantial evidence supporting the findings and requiring denial of the TOC incentive.

B. The Site Plan Review Findings Lack Substantial Evidence

Site Plan Review approval requires three findings identified in LAMC Section 16.05-F. These findings lack substantial evidence.

The project is in substantial conformance with the purposes, intent and provisions of the General Plan, applicable community plan, and does not conflict with any applicable regulations, standards, and any applicable specific plan.

This finding lacks substantial evidence because the Project does not comply with applicable zoning standards, relying on the TOC approval to exceed density and FAR limitations and to obtain relief from parking and yard requirements.

The project consists of an arrangement of buildings and structures (including height, bulk and setbacks), off-street parking facilities, loading areas, lighting, landscaping, trash collection, and other such pertinent improvements that is or will be compatible with existing and future development on neighboring properties

This finding lacks substantial evidence because the conditions of approval contemplate that the Project would require no parking consistent with AB 2097, which is not effective at this date and therefore does not apply to the project. Yet, the findings do not contemplate the possibility that the Project would not provide its four-story parking podium, let alone substantiate how this is compatible with existing and future development on neighboring properties.

III. THE SCEA DOES NOT COMPLY WITH CEQA

A. The SCEA Lacks an Adequate Project Description and Setting

As noted in Appellant’s October 21 and November 1, 2022 objection letters, and other letters submitted by the public, the SCEA is inadequate to comply with CEQA. The Project Description includes an inaccurate Environmental Setting in violation of CEQA Guidelines sections 15124 and 15125 because it misrepresents the proximity of adjacent development. The

SCEA's Project Description also fails to describe existing noise, methane, dewatering and well abandonment project design features, interfering with the public's ability to discern the Project's unmitigated impacts and to identify the efficacy and feasibility of various mitigation measures.

B. The SCEA is Not Consistent with the RTP/SCS

The Project is not eligible for a SCEA because it is not consistent with the RTP/SCS as required by Public Resources Code section 21155. The proposed Project is not eligible for a SCEA because the Project contains too many residential units, is not 15 percent more energy efficient than required by Chapter 6 of Title 24 of the California Code of Regulations and the buildings and landscaping are not designed to achieve 25 percent less water usage than the average household use in the region, and the hazardous materials issues associated with the site have not been adequately mitigated. Therefore the Project is not eligible for a SCEA per Public Resources Code Section 21155.1. An EIR is therefore required for the proposed Project.

Given that the City's adopted Housing Element will result in growth in excess of that analyzed in the RTP/SCS, further exacerbated by recent State legislation such as SB9, SB10 and SB35, no project which results in additional density within the City of Los Angeles is consistent with the RTP/SCS, since it cannot be shown that the proposed Project in combination with the cumulative development resulting from implementation of the Housing Element and recent State laws will not exceed the SCS growth forecasts for the Project area. It therefore cannot be shown that the Project in combination with cumulative development is consistent with the general use designations, density, building intensity, and applicable policies specified for the project area in the strategy.

The SCEA fails to provide any specifics regarding the density and building intensity included in the RTP/SCS for the claimed three Priority Growth Areas. Consistency with the density and intensity assumed in the RTP/SCS for the Project area has therefore not been demonstrated or supported by substantial evidence.

The RTP/SCS specifies that in High Quality Transit Areas (HQTAs): "Active transportation and new developments should be context sensitive, responding to the existing physical conditions of the surrounding area. Sensitively designed TODs can preserve existing development patterns and neighborhood character while providing a balance of modal and housing choices." The height and density of the proposed Project is not context-sensitive to the adjacent National Register Historic District and HPOZ. The proposed Project would result in construction within 15-feet of historic structures and a 28-story high density building adjacent to a low-density historic neighborhood. The proposed Project is thus not consistent with the development objectives for HQTA's in the RTP/SCS.

Similarly, the RTP/SCS specifies that Livable Corridors development result in context sensitive density stating: "The Livable Corridors strategy is comprised of three components that will encourage context sensitive density. . ." In failing to provide context sensitive density, the

proposed Project is inconsistent with both the RTP/SCS's HQTA and Livable Corridors strategies.

RTP/SCS Goal 2 – “Improve mobility, accessibility, reliability, and travel safety for people and goods.” The proposed Project would increase bicycle use in an area with insufficient bicycle infrastructure, exacerbating existing bicycle safety issues. In addition, the Project fails to provide a 15-foot sidewalk along the Project frontage as required in the City's Mobility Element and will not result in the target level of pedestrian safety. The Project is therefore not consistent with RTP/SCS Goal 2.

Similarly, the Project is not consistent with RTP/SCS Guiding Principal 3 – “Assure that land use and growth strategies recognize local input, promote sustainable transportation options, and support equitable and adaptable communities.” The proposed Project is not consistent with the development objectives and definition of High Quality Transit Areas (HQTAs) or the Livable Corridors in the RTP/SCS, due to its failure to provide context sensitive density. Given the proposed Project's excessive height and density in combination with its location immediately adjacent to an important single-family historic district, the proposed Project is thus not consistent with the density assumptions in the RTP/SCS which are based on context sensitive densities. Whether or not the project is consistent with some of the SCS policies is immaterial given that the proposed Project fails to meet the definition of either High Quality Transit Areas (HQTAs) or the Livable Corridors in the RTP/SCS.

The proposed Project is inconsistent with the RTP/SCS strategy of preserving and rehabilitating affordable housing and preventing displacement. The proposed Project may result in the displacement of residents of the Historic District and HPOZ who are bothered by the aesthetic and light and glare impacts of the project. To the degree that the Project makes the HPOZ area less desirable, it may hinder the rehabilitation and maintenance of these historic residences.

The Project is inconsistent with the RTP/SCS strategy of identifying ways to improve access to public park space. Project open space and landscaped areas are primarily for use by the tenants. Little public open space is provided and what is provided may not be readily apparent to nonresidents of the Project.

Section 4 of the SCEA identifies all of the mitigation measures contained in the Mitigation Monitoring and Reporting Program (MMRP) for SCAG's 2020-2045 RTP/SCS Program EIR and provides a discussion of the applicability of the mitigation measures to the Project. However, this is not sufficient to meet the requirements for use of an SCEA. PRC Section 211552(a) provides for use of a SCEA for: “(a) A transit priority project that has incorporated all feasible mitigation measures, performance standards, or criteria set forth in the prior applicable environmental impact reports and adopted in findings made pursuant to Section 21081 . . .”

The SCEA fails to demonstrate that the project has incorporated all feasible mitigation measures, performance standards, or criteria set forth in all of the prior applicable environmental impact reports including but not limited to the EIR's for: (1) the Wilshire Community Plan Update (SCH # 1997081033) Mobility Plan 2035 (SCH#2013041012); (2) the City's Mobility Element Update; and (3) the Housing Element 2021-2029 Update/Safety Element Update (SCH#20211010130).

The Project will result in aesthetic impacts on historic resources, and the City is required to consider aesthetic impacts to historic resources. The SCEA has failed to require compliance with RTP/SCS EIR Mitigation PMM AES-1, AES-2 and AES-3. The scale of the Project is clearly inconsistent with PMM AES-2 which requires minimizing the contrasts in scale and massing between projects and the surrounding development. In addition, given the Project's height and residential nature, it will result in light impacts on the adjacent Historic District and HPOZ, yet the SCEA does not require compliance with AES-3. The Project is thus not eligible for an SCEA.

There are a number of feasible mitigation measures from the RTP/SCS EIR which the SCEA says do not apply to the Project due to a lack of Project-specific impacts for those issue areas, however, that is not what is required by PRC Section 211552(a), which requires incorporation of all feasible mitigation measures, performance standards, or criteria set forth in the prior applicable environmental impact reports. The SCEA's failure to require compliance with all feasible RTP/SCS mitigation measures invalidates the SCEA. This includes failure to require demonstrated compliance with PMM AQ-1, BIO-1 to BIO-6, GEO-1, GHG-1, HAZ-1 to HAZ-7, HYD-1 to HYD-5, LU-2, MIN-1, Noise-1 to Noise-2, PSP-1, PSS-1, PSL-1, TRA-2, USWW-1, USWS-1, etc., without demonstrating that the Project will be required to comply with an equal or more effective measure that addresses all of the components of the RTP/SCS mitigation measure. In the case of measures such as biological resource mitigation measures where the resource of concern is not present on the Project site, compliance should be demonstrated by documenting the lack of the resource as part of the mitigation monitoring process, but the mitigation must still apply.

C. The SCEA Fails to Identify Significant Impacts

The City erred and abused its discretion by finding that the SCEA identified all potentially significant impacts as required by Public Resources Code Section 21155.2, subdivision (b)(5)(A).

The SCEA erroneously asserts that the Project is immune from an analysis of aesthetic resource impacts, since it is located in proximity to historic resources. Goal 5 of the Wilshire Community Plan is to: provide sufficient open space in balance with development to serve the recreational, environmental, health and safety needs of the Wilshire Community Plan, and protect environmental and aesthetic resources. The Plan thus contains aesthetic resource goals.

D. The SCEA Fails to Identify Significant Project Impacts

The City erred and abused its discretion by finding that the SCEA identified all potentially significant impacts as required by Public Resources Code Section 21155.2, subdivision (b)(5)(A). The SCEA fails to characterize anticipated light spillage from all of the apartments in the tower. The SCEA needs to fully disclose the likely light visibility of the Project.

With respect to energy impacts, CEQA Guidelines § 15126.2(b) requires that an environmental review document consider “the project's energy use for all project phases and components, including transportation-related energy, during construction and operation” to assess whether a project will result in wasteful, inefficient, or unnecessary consumption of energy. As noted in the SCEA, analysis to determine whether a project will result in wasteful, inefficient, or unnecessary consumption of energy should include “[t]he project’s energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project” (emphasis added). Similarly, for utility impacts, the SCEA requires consideration of whether the Project will “result in the relocation or construction of new or expanded. . . electrical power [and] natural gas” facilities.

Here, the SCEA does not even attempt to quantify the Project’s estimated energy consumption during its construction phase. This is particularly disconcerting given that the SCEA estimates that the construction phase is expected to last about 32 months, i.e. over two years. Instead, the SCEA blanketly asserts that “[o]verall, construction activities associated with the Project would require limited electricity generation that would not be expected to have an adverse impact on available electricity supplies.” Thus, the SCEA places the cart before the horse in speculating that the Project’s energy and utility impacts will be less than significant without even assessing the Project’s anticipated construction related energy consumption. Without such analysis and information, the SCEA’s less than significant findings are no more than speculative.

The SCEA failed to identify potentially significant public hazard impacts from COVID-19 exposure. Construction work has been defined as a Lower to High-risk activity for COVID-19 spread by the Occupational Safety and Health Administration. Recently, several construction sites have been identified as sources of community spread of COVID-19.

The SCEA failed to adequately analyze cumulative impacts on climate change other than from vehicles and cumulative impacts on transportation. The SCEA fails to analyze the potential cumulative aesthetic impacts of the proposed Project and related Projects on the Historic District and the HPOZs.

The cumulative impacts analysis is inadequate. As explained in SCEA Section 2.5, the analysis only addresses “reasonably foreseeable related projects within a 0.5-mile radius of the Project Site.” The SCEA fails to provide a rationale for limiting the analysis to only projects within a 0.5-mile radius of the Project Site, particularly given that one of the issues is potential

cumulative impacts to an Historic District. This does not comply with CEQA Guidelines Section 15130 (b)(2) and (3) which specifies:

(2) When utilizing a list, as suggested in paragraph (1) of subdivision (b), factors to consider when determining whether to include a related project should include the nature of each environmental resource being examined, the location of the project and its type. Location may be important, for example, when water quality impacts are at issue since projects outside the watershed would probably not contribute to a cumulative effect. Project type may be important, for example, when the impact is specialized, such as a particular air pollutant or mode of traffic.

(3) Lead agencies should define the geographic scope of the area affected by the cumulative effect and provide a reasonable explanation for the geographic limitation used.

E. The SCEA Fails to Adequately Mitigate Potentially Significant Impacts

The City erred and abused its discretion by finding that the SCEA adopted all feasible mitigation measures for significant impacts as required by Public Resources Code Section 21155.2, subdivision (b)(5)(B).

The SCEA failed to adopt sufficient mitigation measures to reduce significant impacts to historic resources to less-than-significant levels including reduction in mass and additional setbacks.

The SCEA improperly defers mitigation of TPH-gasoline and VOC impacts. First, although the SCEA provides that “[b]ased on the groundwater data, the groundwater at the Site is impacted with constituents associated with gas stations (TPH-gasoline, benzene, ethylbenzene)”, it defers the measures it implements to mitigate such impacts. Specifically, the SCEA implements mitigation measures such as requiring a soil management plan (“SMP”) and retention of a dewatering contractor. With regard to the SMP (MM-HAZ-1), the SCEA provides that it will be prepared at some unspecified time in the future by an unspecified and yet to be determined environmental consultant. Similarly, for the dewatering contractor (MM-HAZ-2), the SCEA confirms that such contractor has yet to be retained, fails to provide required qualifications for the contractor, and fails to provide design specifications. The SCEA does not specify why it is infeasible to prepare these plans before Project approval.

Moreover methane mitigation has been improperly deferred and methane impacts insufficiently analyzed.

In light of these deficiencies, the Project’s hazardous material impacts are not truly mitigated, rendering the Project ineligible for SCEA review in the first place. See PRC section 21155.1(a)(4)(B) [holding that a project is only eligible for SCEA review if “a potential for exposure to significant hazards from surrounding properties or activities. . . [is] mitigated to a

level of insignificance”]. Thus, in addition to needing to rectify its mitigation measures, a full EIR should be prepared for the Project since it does not comply with all of the SCEA eligibility requirements.

The SCEA’s noise mitigation measures, implemented to mitigate the Project’s significant noise levels on nearby sensitive receptors such as a temple, school, park, senior living community, and residences, are ineffective and improperly deferred. For example, the SCEA implements MM-NOI-1 to require sound barriers along the Project’s eastern boundary which are “to achieve a sound attenuation of at least 15 dBA” and which shall be “a minimum of 20 feet in height.” Similarly, the SCEA implements MM-NOI-3 to require sound barriers along the Project’s western boundary which are also “to achieve a sound attenuation of at least 15 dBA” and which shall be “a minimum of 7 feet in height.”

However, assuming the barriers sit on the ground at the perimeter of the Project, the barriers would not adequately mitigate noise sources elevated above the ground level as construction of the building progresses. The mitigation measures must be revised to fully explain how noise barriers would be used to mitigate noise impacts at a minimum of 15 dBA for elevated sources during construction of the twenty eight-story building. The SCEA does not specify why it is infeasible to prepare these plans before Project approval.

To “ensure that the Project’s construction does not expose South Alfred Street Residences and a commercial building at 1080 La Cienega Boulevard to potentially damaging levels of groundborne vibration”, the SCEA implements a number of mitigation measures such as requiring a pre-construction survey to be performed and implementation of a groundborne vibration and structural/architectural monitoring program (MM-NOI-10). However, the SCEA notes that such preconstruction surveys have yet to be prepared rendering it impossible to determine the feasibility of mitigating vibration impacts to historic structures. The SCEA does not specify why it is infeasible to prepare these plans before Project approval.

The SCEA failed to require a local hire program to mitigate greenhouse gas and air quality impacts as recommended by SWAPE report.

The SCEA also improperly defers its transportation project design feature, a mitigation measure in essence designed to “ensure that adequate emergency access exists during construction.” The SCEA provides that “[p]rior to the start of construction, the Project Applicant shall prepare a detailed Construction Traffic Management Plan (CTMP), including street closure information, detour plans, haul routes, and staging plans, and submit it to LADOT for review and approval” (emphasis added). Thus, the SCEA’s transportation mitigation measure is similarly deferred as the plan has yet to be prepared nor circulated for public review and comment.

IV. CONCLUSION

I respectfully request that you grant the appeal, deny the Entitlements or require recirculation of the EIR.

EXHIBIT B

ORIGINAL DIRECTOR'S DETERMINATION

**DEPARTMENT OF
CITY PLANNING**

COMMISSION OFFICE
(213) 978-1300

CITY PLANNING COMMISSION

SAMANTHA MILLMAN
PRESIDENT

MONIQUE LAWSHE
VICE-PRESIDENT

MARIA CABILDO
CAROLINE CHOE
ILISSA GOLD
HELEN LEUNG
KAREN MACK
JACOB NOONAN
ELIZABETH ZAMORA

**CITY OF LOS ANGELES
CALIFORNIA**



KAREN BASS
MAYOR

EXECUTIVE OFFICES

200 N. SPRING STREET, ROOM 525
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VINCENT P. BERTONI, AICP
DIRECTOR

SHANA M.M. BONSTIN
DEPUTY DIRECTOR

ARTHI L. VARMA, AICP
DEPUTY DIRECTOR

LISA M. WEBBER, AICP
DEPUTY DIRECTOR

**DIRECTOR'S DETERMINATION
TRANSIT ORIENTED COMMUNITIES AFFORDABLE HOUSING INCENTIVE PROGRAM
SITE PLAN REVIEW**

September 21, 2023

Applicant / Owner

1050 La Cienega, LLC
429 Santa Monica Boulevard, #700
Santa Monica, CA 90401

Representative

Dave Rand, Rand Paster Nelson
LLP
633 West 5th Street, 64th Floor
Los Angeles, CA 90071

Case No. DIR-2022-2279-TOC-SPR-
VHCA

CEQA: ENV-2022-2280-SCEA

Location: 1022-1066 South La Cienega
Boulevard

Council District: 5 – Yaroslavsky

Neighborhood Council: P.I.C.O.

Community Plan Area: Wilshire

Land Use Designation: General Commercial

Zone: C2-1-O

Legal Description: Lots 119-122, Tract 7170
and Lots 233-237, Tract
7171

Last Day to File an Appeal: October 6, 2023

**DETERMINATION – Transit Oriented Communities Affordable Housing Incentive Program and
Site Plan Review**

Pursuant to Los Angeles Municipal Code (LAMC) Sections 12.22 A.31 and 16.05, I have reviewed the proposed project and as the designee of the Director of Planning, I hereby:

- 1. Find**, based on the whole of the record and in my independent judgment, the project was analyzed in the Sustainable Communities Environmental Assessment No. ENV-2022-2280-SCEA ("SCEA") adopted by the City Council on November 22, 2022, and adopt the mitigation measures and Mitigation Monitoring Program for the project;
- 2. Approve with Conditions** a 45 percent increase in density, consistent with the provisions of the Transit Oriented Communities (TOC) Affordable Housing Incentive Program along with the following one (1) incentive for a qualifying Tier 3 project totaling 290 dwelling units, reserving a minimum of 29 units for

Extremely Low Income (ELI) Household occupancy for a period of 55 years:

- a. **Yards/Setbacks.** Utilization of any/all of the yard/setback requirements of the RAS3 Zone for a project in a commercial zone;
3. **Approve** a Site Plan Review for a development creating 50 or more residential dwelling units; and
4. **Adopt** the attached Findings.

CONDITIONS OF APPROVAL

Pursuant to Sections 12.22 A.31 and 16.05 of the LAMC, 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 Planning. Each change shall be identified and justified in writing.
2. **On-site Restricted Affordable Units.** 29 units, or equal to a minimum of 10 percent of the total number of dwelling units, shall be designated for Extremely Low Income Households, as defined by the Los Angeles Housing Department (LAHD) and California Government Code Section 65915(c)(2).
3. **Changes in On-site Restricted Units.** Deviations that increase the number of restricted affordable units or that change the composition of units or change parking numbers shall be consistent with LAMC Section 12.22 A.31.
4. **Housing Requirements.** Prior to issuance of a building permit, the owner shall execute a covenant to the satisfaction of LAHD to make 10 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 LAHD 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 LAHD, and in consideration of the project's SB 8 or SB 330 Determination. Enforcement of the terms of said covenant shall be the responsibility of LAHD. 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 LAHD. Refer to the Density Bonus Legislation Background section of this determination.
5. **Base Incentives:**
 - a. **Residential Density.** The project shall be limited to a maximum density of 290 residential dwelling units (equal to a density increase of 45 percent), including On-site Restricted Affordable Units.

b. **Parking:**

- i. **Automotive Parking.** Automobile parking shall be provided consistent with the LAMC and/or Assembly Bill (AB) 2097. A greater number than the minimum required may be provided at the applicant's discretion. In the event that the number of On-Site Restricted Affordable Units should increase or the composition of such units should change, then no modification of this determination shall be necessary and the number of vehicle parking spaces shall be re-calculated consistent with LAMC Section 12.22 A.31.
- ii. **Bicycle Parking.** Bicycle parking shall be provided consistent with LAMC Section 12.21 A.16. In the event that the number of On-Site Restricted Affordable Units should increase or the composition of such units should change, then no modification of this determination shall be necessary and the number of bicycle parking spaces shall be re-calculated by the Department of Building and Safety consistent with LAMC Section 12.21 A.16.
- iii. **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 LAHD.

6. **Additional Incentives:**

- a. **Yards/Setbacks.** The project may be permitted to utilize any/all of the yard/setback requirements of the RAS3 Zone for a project in a commercial zone.

Design Conformance Conditions

7. **Building Facades:**

- a. The project shall utilize a minimum of two different materials on all building facades. Windows, doors, balcony railings, and decorative features (such as light fixtures, planters, etc.) shall not count towards this requirement.
- b. Along the project's ground floor façade along La Cienega Boulevard, the project shall incorporate no less than a total of 150 horizontal feet of transparent/glazed surfaces, such as windows and transparent doors. Transparent/glazed surfaces must be a minimum of four feet in height to count towards this requirement.

8. **Landscaping.** 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. The landscape plan shall indicate landscape points for the project equivalent to 10 percent more than otherwise required by LAMC 12.40 and Landscape Ordinance Guidelines.

9. **Parking.** With the exception of vehicle and pedestrian entrances and air grilles, any ground-level vehicle parking shall be completely enclosed along all sides of the building.

Site Plan Review Conditions

10. **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 on all exposed sides (those not adjacent to a building wall).
11. **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 night skies.
12. **Maintenance.** The subject property, including any trash storage areas, associated parking facilities, sidewalks, driveways, yard areas, parkways, and exterior walls along the property lines, shall be maintained in an attractive condition and shall be kept free of trash and debris.
13. **Trash.** Trash receptacles shall be stored within a fully enclosed portion of the building at all times. Trash/recycling containers shall be locked when not in use and shall not be placed in or block access to required parking.
14. **Sustainability:**
 - a. The project shall comply with Section 99.05.211.1 of the LAMC regarding solar energy infrastructure.
 - b. All electric vehicle charging spaces (EV Spaces) and electric vehicle charging stations (EVCS) shall comply with the regulations outlined in Sections 99.04.106 and 99.05.106 of the LAMC.

Administrative Conditions

15. **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.
16. **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.
17. **Approval, Verification and Submittals.** Copies of any approvals, guarantees or verification of consultations, review of approval, plans, etc., as may be required by the subject conditions, shall be provided to the Department of City Planning prior to clearance of any building permits, for placement in the subject file.
18. **Code Compliance.** Use, area, height, and yard regulations of the zone classification of the subject property shall be complied with, except where granted conditions differ herein.
19. **Department of Building & 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.

20. **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.
21. **Enforcement.** Compliance with and the intent of these conditions shall be to the satisfaction of the Department of City Planning.
22. **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.
23. **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.
24. **Indemnification and Reimbursement of Litigation Costs.**

Applicant shall do all of the following:

- (i) Defend, indemnify and hold harmless the City from any and all actions against the City relating to or arising out of, in whole or in part, the City's processing and approval of this entitlement, including but not limited to, an action to attack, challenge, set aside, void, or otherwise modify or annul the approval of the entitlement, the environmental review of the entitlement, or the approval of subsequent permit decisions, or to claim personal property damage, including from inverse condemnation or any other constitutional claim.
- (ii) Reimburse the City for any and all costs incurred in defense of an action related to or arising out of, in whole or in part, 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.
- (iii) Submit an initial deposit for the City's litigation costs to the City within 10 days' notice of the City tendering defense to the Applicant and requesting a deposit. The initial deposit shall be in an amount set by the City Attorney's Office, in its sole discretion, based on the nature and scope of action, but in no event shall the initial deposit be less than \$50,000. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).

- (iv) Submit supplemental deposits upon notice by the City. Supplemental deposits may be required in an increased amount from the initial deposit if found necessary by the City to protect the City's interests. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).
- (v) If the City determines it necessary to protect the City's interest, execute an indemnity and reimbursement agreement with the City under terms consistent with the requirements of this condition.

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

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

For purposes of this condition, the following definitions apply:

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

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

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

PROJECT BACKGROUND

The subject property consists of 11 contiguous lots encompassing a total of approximately 79,624 square feet of lot area. The property is rectangular-shaped and is located mid-block along the eastern side of La Cienega Boulevard, with a street frontage of approximately 500 feet. The project site is located within the Wilshire Community Plan and is zoned C2-1-O with a corresponding land use designation of General Commercial. The project site is also located within a Transit Priority Area within the City of Los Angeles. The property is not within the boundaries of any other specific plan or interim control ordinance.

The subject property is currently entirely vacant. The proposed project involves the construction of a new 24-story, approximately 272 feet-high mixed-use residential and commercial building with 290 residential units above approximately 4,100 square feet of commercial space on the

ground floor. The proposed building will encompass approximately 297,680 square feet in total building area, resulting in a Floor Area Ratio (FAR) of approximately 3.75:1. Of the 290 proposed residential units, 29 units will be set aside for Extremely Low Income households to satisfy the TOC program requirements. The project proposes to provide 412 automobile parking spaces in one subterranean parking level and on portions of the ground, second, and third levels. The project will also provide 164 long-term bicycle parking spaces and 20 short-term bicycle parking spaces. The project proposes to provide approximately 51,517 square feet of open space to meet the requirements of the TOC program and the LAMC, divided between outdoor spaces on the ground floor, outdoor spaces on the third floor, a rooftop deck, and various interior amenity spaces and common rooms. The project will maintain a front yard setback of zero feet along La Cienega Boulevard, northerly and southerly side yard setbacks of 30 feet and five feet respectively (in lieu of the otherwise required 16 feet, as permitted by an Additional Incentive to utilize the southerly side yard setback requirements of the RAS3 Zone), and an easterly rear yard setback of 28 feet.

Streets

La Cienega Boulevard, adjoining the subject property to the west, is a designated Avenue I, with a designated right-of-way width of 100 feet. Along the subject property's street frontage, La Cienega Boulevard is currently dedicated to a total right-of-way width of 100 feet and improved with curb, gutter, and sidewalk.

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 1/2 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; a project in closer proximity to significant rail stops or the intersection of major bus rapid transit lines is rated a higher tier. The largest bonuses are reserved for those projects in the highest tiers. Required percentages of affordable housing are also 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.

The subject property is located within a Tier 3 TOC Affordable Housing Incentive Area, qualified by its proximity to the intersection of a Major Transit Stop. The project site is located approximately 200 feet south of the intersection of La Cienega Boulevard and Olympic Boulevard, where the Metro 28 bus line, classified as a Next-Gen Tier 1 Rapid bus line, intersects with the Metro 105 bus line, also classified as a Next-Gen Tier 1 Rapid bus line. In addition, the subject property is also located approximately 2,350 feet south of the future Wilshire/La Cienega subway station on the Metro D Line subway¹. As such, the project meets the eligibility requirement for a TOC Housing Development to be located within 2,640 feet of a Major Transit Stop and the eligibility requirement for a Tier 3 project to be located within 1,500 feet of the intersection of two rapid bus

¹ A portion of the subject property is within 2,640 feet of the Wilshire/La Cienega subway station; per the TOC Guidelines dated February 26 2018, Section IV.7, a building that crosses one or more lots may request the TOC Incentives that correspond to the lot with the highest Tier permitted pursuant to the TOC Guidelines.

lines, each with average frequencies of service intervals of less than 15 minutes during peak times, as well as the requirement for a Tier 3 project to be located within 2,640 feet of a Metro Rail station.

The project meets all eligibility requirements for the TOC Affordable Housing Incentive Program. As an eligible Housing Development and pursuant to the TOC Guidelines, the project is eligible for Base Incentives and up to three Additional Incentives. As base incentives, the project is eligible to (1) increase the maximum allowable number of dwelling units permitted by 70 percent; (2) increase the maximum allowable FAR up to 3.75:1 for a project in a commercial zone; and (3) provide automobile parking at a ratio of 0.5 spaces per unit, although this requirement may be superseded by other State requirements. The project is seeking an approximately 45 percent density increase and an increase in FAR to 3.75:1 and will provide at least the minimum number of parking spaces required. The project is also requesting one Additional Incentive, for the utilization of any/all of the yard/setback requirements of the RAS3 Zone for a project in a commercial zone. The project meets the TOC Guideline requirements of providing at least four percent of the base units for Extremely Low Income Households in exchange for being granted the one requested Additional Incentive. The project is setting aside 29 units for Extremely Low Income Households, which equates to approximately 14.5 percent of the 200 base units permitted through the underlying zoning of the site.

HOUSING REPLACEMENT BACKGROUND

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.

In addition to the requirements of California State Density Bonus Law, on October 9, 2019, the Governor signed into law the Housing Crisis Act of 2019 (SB 330, and as amended by SB 8), which creates new state laws regarding the production, preservation and planning for housing, and establishes a statewide housing emergency until January 1, 2025. During the duration of the statewide housing emergency, SB 330 (and as amended by SB 8) creates, among other things, new housing replacement requirements for Housing Development Projects by prohibiting the approval of any proposed housing development project on a site that will require the demolition of existing residential dwelling units or occupied or vacant "Protected Units" unless the proposed housing development project replaces those units. The project shall provide at least as many

residential dwelling units as the greatest number of residential dwelling units that existed on the property within the past 5 years. Additionally, the project must also replace all existing or demolished "Protected Units".

The subject property is currently entirely vacant. LAHD has determined, per the SB 330 Replacement Unit Determination letter dated December 6, 2021, that the property was formerly developed entirely with commercial uses and there have been no residential uses within the past five years, and therefore no replacement units need to be provided. The project will further comply with any applicable requirements of LAHD. The Determination made by LAHD provides additional information.

TRANSIT ORIENTED COMMUNITIES AFFORDABLE HOUSING INCENTIVE PROGRAM ELIGIBILITY REQUIREMENTS AND APPLICATION AND APPROVALS

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 the request herein 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 3 TOC Affordable Housing Incentive Area. As part of the proposed development, the project is required to reserve a minimum of ten percent of the total number of on-site dwelling units for Extremely Low Income Households. The project will reserve a total of 29 on-site dwelling units for Extremely Low Income Households, which equates to 10 percent of the 290 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 2,640 feet of a Major Transit Stop, 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 project site is located approximately 200 feet south of the intersection of La

Cienega Boulevard and Olympic Boulevard, where the Metro 28 bus line, classified as a Next-Gen Tier 1 Rapid bus line, intersects with the Metro 105 bus line, also classified as a Next-Gen Tier 1 Rapid bus line. In addition, the subject property is also located approximately 2,350 feet south of the future Wilshire/La Cienega subway station on the Metro D Line subway. As such, the project meets the eligibility requirement for a TOC Housing Development to be located within 2,640 feet of a Major Transit Stop and the eligibility requirement for a Tier 3 project to be located within 1,500 feet of the intersection of two rapid bus lines, each with average frequencies of service intervals of less than 15 minutes during peak times, as well as the requirement for a Tier 3 project to be located within 2,640 feet of a Metro Rail station.

3. **Housing Replacement.** *A Housing Development must meet any applicable housing replacement requirements of California Government Code Section 65915(c)(3), as verified by LAHD 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 LAHD dated December 6, 2021 and attached to the subject case file, the subject property is currently entirely vacant. LAHD has determined that the property was formerly developed entirely with commercial uses and there have been no residential uses within the past five years, and therefore no replacement units need to be provided. The project will further comply with any applicable requirements of LAHD, and will further comply with all applicable requirements of the City's Rent Stabilization Ordinance. 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 requesting one Additional Incentive, for the utilization of any/all of the yard/setback requirements of the RAS3 Zone for a project in a commercial zone. The project meets the TOC Guideline requirements of providing at least four percent of the base units for Extremely Low Income Households in exchange for being granted the one requested Additional Incentive. The project is setting aside 29 units for Extremely Low Income Households, which equates to approximately 14.5 percent of the 200 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 one permitted in exchange for reserving at least four percent of the base units for Extremely Low Income Households. The project is setting aside 29 units for Extremely Low Income Households, which equates to approximately 14.5 percent of the 200 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 subject property consists of 11 contiguous lots, all of which are within 1,500 feet of the intersection of two rapid bus lines, each with average frequencies of service intervals of less than 15 minutes during peak times. Separately, a portion of the subject property is within 2,640 feet of the Wilshire/La Cienega subway station. As such, the highest corresponding Tier permitted by the TOC Guidelines is Tier 3 under both qualifiers, and the project is therefore an eligible Tier 3 housing development.

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 is not seeking eligibility for an increase in one Tier than otherwise would be provided.

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 of the TOC Guidelines.*

The project seeks one (1) Additional Incentive. The proposed development conforms to the Citywide Design Guidelines and has been conditioned to ensure a well-designed development and compliance with the Design Guidelines. The project has been designed to incorporate visually interesting variations in building material and massing. Additionally, the project has been conditioned to provide glazing and transparent surfaces along the street frontages as well as landscaping and buffers around all utilities such as transformers and to completely enclose any visible automobile parking to minimize impacts on surrounding properties. These design features do not preclude the provision of the permitted density of residential units. Thus, the project conforms to the applicable design guidelines and conditions have been imposed accordingly.

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 result in identifiable and actual cost reductions to provide for affordable housing costs, as defined in California Health and Safety Code Section 50052.5 or Section 50053 for rents for the affordable units.*

The record does not contain substantial evidence that would allow the Director to make a finding that the requested incentives do not result in identifiable and actual affordable housing costs per State Law. The California Health & Safety Code Sections 50052.5

and 50053 define formulas for calculating affordable housing costs for very low, low, and moderate income households. Section 50052.5 addresses owner-occupied housing and Section 50053 addresses rental households. Affordable housing costs are a calculation of residential rent or ownership pricing not to exceed 25 percent gross income based on area median income thresholds dependent on affordability levels.

The list of Additional 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 types of relief that minimize restrictions on the size of the project. As such, the Director will always arrive at the conclusion that the Additional Incentives are required to provide for affordable housing costs because the Incentives by their nature increase the scale of the project, allow for design efficiencies, and accommodate the construction of floor area to support the operational costs and construction of the affordable housing units.

Yards/Setbacks. The requested incentive to reduce the side yard setback requirements is expressed in the Menu of Incentives in the TOC Guidelines which permit exceptions to zoning requirements that result in building design or construction efficiencies that facilitate the creation of affordable housing. In this case, the applicant has requested to utilize a side yard setback of the RAS3 Zone for a project in a commercial zone, to permit a southerly side yard setback of five feet in lieu of the otherwise required 16 feet. The requested incentive allows the developer to expand the building footprint and enables the provision of additional floor area and more residential units, including affordable units, while remaining in compliance with all other applicable zoning regulations. The provision of additional housing units at higher income levels offsets costs associated with providing affordable housing units at the Extremely Low Income level and enables the provision of additional units set aside for Extremely Low Income households. Therefore, the incentive further supports the applicant's decision to reserve 29 units for Extremely Low Income Households and facilitates the creation of affordable housing units.

Therefore, the Additional Incentive results in identifiable and actual cost reductions to provide for affordable housing.

- b. *The Incentive will have 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 incentives 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. Although the project site abuts a Historic Preservation Overlay Zone

(HPOZ), the project site is not located in such an overlay and thus is not subject to such regulations. In addition, there is no evidence in the record demonstrating any quantifiable and significant impacts on the abutting HPOZ. The project is entirely consistent with the applicable zoning regulations and with the TOC program and will not affect the status of the HPOZ or the integrity of any of the individual contributors to the HPOZ. Accordingly, the project will not have a significant impact on any historic resources.

The project site is located within a Methane Zone and a Liquefaction Zone, and thus will be required to comply with all applicable regulatory measures governing construction in such areas, which will prevent any significant impacts. The property is not located on a substandard street in a Hillside area, a Very High Fire Hazard Severity Zone or any other special hazard area. The project is required to comply with all other pertinent regulations including those governing construction, use, and maintenance, and will not create any significant direct impacts on public health and safety. 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.

c. The Incentives are contrary to state or federal law.

There is no substantial evidence in the record indicating that the requested Incentives are contrary to any State or federal laws.

SITE PLAN REVIEW FINDINGS

2. The project is in substantial conformance with the purposes, intent and provisions of the General Plan, applicable community plan, and does not conflict with any applicable regulations, standards, and any applicable specific plan.

The project site is located within the Wilshire Community Plan, which is one of 35 Community Plans which together form the land use element of the General Plan. The Community Plan designates the site for General Commercial land uses corresponding to the C1.5, C2, C4, RAS3, and RAS4 zones. The subject property is zoned C2-1-O, and is thus consistent with the land use designation on the site. The project site is also located within a Transit Priority Area in the City of Los Angeles. The project site is not subject to any other overlay or interim control ordinance.

With the exception of the requests herein, which enable the provision of affordable housing units, the proposed project is otherwise consistent with the requirements of the underlying zone. The project proposes a new mixed-use residential and commercial development on a site designated for such uses. The requested Incentives are permissible by the provisions of the TOC program and the project will comply with all other applicable provisions of the zoning code.

The project is also consistent with the following goals and objectives of the Wilshire Community Plan:

GOAL 1: "PROVIDE A SAFE, SECURE, AND HIGH QUALITY RESIDENTIAL ENVIRONMENT FOR ALL ECONOMIC, AGE, AND ETHNIC SEGMENTS OF THE WILSHIRE COMMUNITY."

Objective 1-1: "Provide for the preservation of existing quality housing, and for the development of new housing to meet the diverse economic and physical needs of the existing residents and expected new residents in the Wilshire Community Plan Area to the year 2010."

Objective 1-2: "Reduce vehicular trips and congestion by developing new housing in close proximity to regional and community commercial centers, subway stations and existing bus route stops."

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

GOAL 2: "ENCOURAGE STRONG AND COMPETITIVE COMMERCIAL SECTORS WHICH PROMOTE ECONOMIC VITALITY AND SERVE THE NEEDS OF THE WILSHIRE COMMUNITY THROUGH WELL-DESIGNED, SAFE AND ACCESSIBLE AREAS, WHILE PRESERVING HISTORIC AND CULTURAL CHARACTER."

Objective 2-1: "Preserve and strengthen viable commercial development and provide additional opportunities for new commercial development and services within existing commercial areas."

Objective 2-2: "Promote distinctive commercial districts and pedestrian-oriented areas."

Objective 2-3: "Enhance the visual appearance and appeal of commercial districts."

The project is further consistent with other elements of the General Plan, including the Framework Element, the Housing Element, and the Mobility Element. The Framework Element was adopted by the City of Los Angeles in December 1996 and re-adopted in August 2001. The Framework Element provides guidance regarding policy issues for the entire City of Los Angeles, including the project site. The Framework Element also sets forth a Citywide comprehensive long-range growth strategy and defines Citywide policies regarding such issues as land use, housing, urban form, neighborhood design, open space, economic development, transportation, infrastructure, and public services. The project supports the following goals and objectives of the Framework Element:

GOAL 4A: "AN EQUITABLE DISTRIBUTION OF HOUSING OPPORTUNITIES BY TYPE AND COST ACCESSIBLE TO ALL RESIDENTS OF THE CITY."

Objective 4.1: "Plan the capacity for and develop incentives to encourage production of an adequate supply of housing units of various types within each City sub-region to meet the projected housing needs by income level of the future population..."

The Housing Element of the General Plan provides land use policies and programs that encourage development of affordable housing across the City. The project also supports the following goals and objectives of the Housing Element:

GOAL 1: "HOUSING PRODUCTION AND PRESERVATION."

Objective 1.1: "Produce an adequate supply of rental and ownership housing in order to meet current and projected needs."

GOAL 2: "SAFE, LIVEABLE, AND SUSTAINABLE NEIGHBORHOODS."

Objective 2.2: "Promote sustainable neighborhoods that have mixed-income housing, jobs, amenities, services and transit."

Objective 2.5: "Promote a more equitable distribution of affordable housing opportunities throughout the City."

The Mobility Element of the General Plan, also known as Mobility Plan 2035, provides policies with the ultimate goal of developing a balanced transportation network for all users. The project supports the following policies of the Mobility Element:

Policy 3.3: "Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services."

Policy 5.2: "Support ways to reduce vehicle miles traveled (VMT) per capita."

Policy 5.4: "Continue to encourage the adoption of low and zero emission fuel sources, new mobility technologies, and supporting infrastructure."

The project proposes the development of a new mixed-use multi-family and commercial development that will provide much-needed housing, including affordable housing, and neighborhood-serving commercial uses. Accordingly, the project fulfills the Community Plan, Framework Element, and Housing Element goals and objectives of providing quality housing for all persons in the community, including those at all income levels. The project utilizes development incentives to provide a higher number of residential units than would otherwise be permitted, thereby facilitating the creation of a higher number of affordable units and addressing the need for affordable housing in the City.

The project is located on La Cienega Boulevard, a major arterial roadway designated in the Community Plan as a desired "mixed-use boulevard"; as such, the project fulfills this goal with the exact type of development envisioned and desired for this location. Additionally, the project is located in central Los Angeles in a heavily urbanized and bustling neighborhood developed with extensive jobs, services, and transit, and in close proximity to a future subway station. Thus, by locating higher-density development along major transit corridors and by providing commercial services and jobs in proximity to residences, the project will contribute towards the creation of sustainable neighborhoods and a reduction in vehicle trips and VMT. The project will further promote mobility and sustainable environments by providing active and transparent building facades, amenities such as outdoor open space, and incorporating new and additional landscaping, all of which will significantly improve pedestrian movement and the quality of the streetscape in the area. The proposed improvements represent a significant improvement over the existing site conditions which consist of a surface parking lot and help realize the City's goals. The project will also implement any dedications and improvements as required by the Bureau of Engineering, which will further facilitate and enhance movement of all forms across the neighborhood.

In addition, the project has been conditioned to include automobile parking spaces both ready for immediate use by electric vehicles (e.g. with electric vehicle chargers installed) and capable of supporting electric vehicles in the future, as well as to provide solar infrastructure, all in conformance with current building code requirements. Together, these conditions further support applicable policies in the Health and Wellness Element, Air Quality Element, and Mobility Element of the General Plan by reducing the level of pollution/greenhouse gas emissions, ensuring new development is compatible with alternative fuel vehicles, and encouraging the adoption of low emission fuel sources and supporting infrastructure. These conditions also support good planning practice by promoting overall sustainability and providing additional benefits and conveniences for residents, workers, and visitors.

The project contributes to and furthers the relevant goals, objectives, and policies of the plans that govern land use and development in the City. In addition, the project does not substantially conflict with any applicable plan or other regulation. Therefore, the project substantially conforms with the purpose, intent, and provisions of the General Plan and the applicable Community Plan.

3. The project consists of an arrangement of buildings and structures (including height, bulk and setbacks), off-street parking facilities, loading areas, lighting, landscaping, trash collection, and other such pertinent improvements that is or will be compatible with existing and future development on neighboring properties.

The subject property consists of 11 contiguous lots encompassing a total of approximately 79,624 square feet of lot area. The property is rectangular-shaped and is located mid-block along the eastern side of La Cienega Boulevard, with a street frontage of approximately 500 feet.

The subject property is currently entirely vacant. The proposed project involves the construction of a new 24-story mixed-use residential and commercial building with 290 residential units above approximately 4,100 square feet of commercial space on the ground floor. The project proposes to provide 412 automobile parking spaces in one subterranean parking level and on portions of the ground, second, and third levels. The project will maintain a front yard setback of zero feet along La Cienega Boulevard, northerly and southerly side yard setbacks of 30 feet and five feet respectively (in lieu of the otherwise required 16 feet, as permitted by an Additional Incentive to utilize the southerly side yard setback requirements of the RAS3 Zone), and an easterly rear yard setback of 28 feet.

The project and all of its pertinent improvements will be compatible with neighboring properties. The project is a desirable mixed-use residential and commercial development in a location and neighborhood zoned and designated for such uses. The project site is located in a heavily developed area in close proximity to high-quality transit options. The project will provide much-needed affordable housing and will not preclude any future development on the subject property or on any adjacent property. Accordingly, the project has been designed such that its significant features and improvements will be compatible with the surrounding area, as follows:

Height, Bulk, Setbacks

As depicted in Exhibit “A”, the proposed project consists of the construction of a new 24-story mixed-use building. The proposed building will encompass approximately 297,680 square feet in total building area and will rise to a height of approximately 272 feet (with limited exceptions for roof structures, per the LAMC).

The City’s zoning regulations, specifically those that govern building height, mass, and location on a property, are intended to ensure that a development is compatible with its surroundings and is appropriate for its location. The underlying C2-1-O Zone limits the project to a maximum FAR of 1.5:1, although it does not prescribe any building height limits. However, as a TOC development the project is eligible for Incentives to increase the FAR; accordingly, the project is seeking Incentives to permit the maximum FAR as proposed. As there is no underlying height limit, the project is entirely consistent with the underlying zone with regards to building height.

The C2-1-O Zone also prescribes front yard setback requirements of zero feet, rear yard setback requirements of 15 feet plus one foot for every additional story above the third level, and side yard setback requirements of zero feet for commercial uses and five feet for residential uses plus one foot for every additional story above the second level. However, the project is able to request to utilize any of the yard requirements of the RAS3 Zone for a development located in a commercial zone, as an additional Incentive under the TOC program. Accordingly, the project is seeking an Incentive to permit a southerly side yard setback of five feet at the lowest residential level, per the requirements of the RAS3 Zone. Notably, the project is exceeding the required northerly side yard and easterly rear yard setbacks by design and will provide common open space in these areas.

The proposed building height, mass, and setbacks are all consistent/permissible with all applicable zoning regulations and the TOC Guidelines, and as a result will be compatible with adjacent properties. The project will complement many existing multi-family developments in the area. The proposed building’s active and transparent façade along La Cienega Boulevard will enhance a significant stretch of currently vacant land. Additionally, as the project site is located near a Major Transit Stop, the project will enhance and encourage pedestrian mobility and access. The project further varies building mass with a three-story podium and residential tower, as well as interesting architectural features such as arches along the street frontages. Furthermore, the project’s proposed open space areas in the side and rear yard setback areas both provide valuable outdoor space and minimize potential impacts on adjacent properties as it provides additional variation and setbacks in building mass. The project meets all required setback requirements. Therefore, the project’s height, mass, and setbacks will be compatible with adjacent properties.

Site Layout – Parking, Trash Collection, Landscaping, and Lighting

At the ground floor, the project proposes commercial tenant space, residential lobby, and interior amenity spaces prominently located along the La Cienega Boulevard street frontage. Vehicle parking will be provided in the remainder of the ground floor to the rear, with vehicular access located along La Cienega Boulevard. Trash collection will be entirely enclosed within the building footprint and accessed via the vehicle driveway, along with two loading zone areas.

The proposed site layout is thoughtful and will minimize any potential impacts to the project's surroundings. The main street frontage along La Cienega Boulevard is activated with transparent semi-public and commercial uses and is further enhanced with interesting architectural materials; these design elements will enhance the project's surroundings, encourage pedestrian activity along the street, and facilitate movement and access along a major arterial commercial and mixed-use corridor.

Short-term bicycle parking is proposed along the street frontage at the ground level, while long-term bicycle parking is stored in dedicated enclosures at the rear of the ground level; both locations maximize convenience and enable residents and guests to safely and easily access an alternative mode of transportation. The proposed trash collection location is also easily accessible yet fully enclosed within the building footprint, thereby shielding the trash enclosures from view by adjacent properties.

The project includes several prominent open space areas, including ground floor areas along the side and rear of the building, at the third floor on top of the building podium, and on the rooftop. These areas will be landscaped with planters and provide valuable outdoor recreation and amenity space. As the upper residential levels are located in a tower, the open space areas on the podium will be open to the sky, resulting in a more open building massing with more access to light and landscaping below for the units in the tower. The landscaping provided will also enhance the appearance of the building both internally and from various external angles, and will thus be compatible with other improvements on the subject property and abutting properties.

Furthermore, appropriate lighting and additional landscaping have been conditioned and will be provided in accordance with the requirements of the LAMC. The project has been designed to provide adequate lighting for operation and safety and to meet all regulations while limiting potential impacts. Additional landscaping such as street trees will be provided throughout the property per the requirements of the applicable City agencies. Therefore, for all of these reasons, the project will significantly improve the physical appearance of the property and will be compatible with existing and future development on the subject property and on surrounding properties.

4. Any residential project provides recreational and service amenities in order to improve habitability for the residents and minimize impacts on neighboring properties.

The project proposes to provide approximately 51,517 square feet of open space to meet the requirements of the TOC program and the LAMC, divided between outdoor spaces on the ground floor, outdoor spaces on the third floor, a rooftop deck, and various interior amenity spaces and common rooms.

The project will provide a wide array of high-quality recreational and service amenities for residents of the development. The ground floor, podium deck, and the rooftop deck will provide landscaping, seating, casual dining, and other amenities for residents and guests. Various indoor fitness center and lounge spaces will provide further unique and valuable amenities for residents and guests. The project will also provide private outdoor spaces in the form of balconies accessible through various individual units, thereby adding quality and value to individual residences. Therefore, the project provides many different recreational and service amenities which will improve habitability for residents, and will minimize impacts on neighboring properties.

ENVIRONMENTAL FINDINGS

5. It is hereby found that based on the whole of the record and in the independent judgment of the Director of Planning, the project was analyzed in the Sustainable Communities Environmental Assessment No. ENV-2022-2280-SCEA (“SCEA”) adopted by the City Council on November 22, 2022, and the mitigation measures and Mitigation Monitoring Program for the project have been adopted herein.
6. 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 X, areas with a 0.2 percent annual chance flood hazard (500-year flood zone).

OBSERVANCE OF CONDITIONS – TIME LIMIT – LAPSE OF PRIVILEGES

All terms and conditions of the Director’s Determination shall be fulfilled before the use may be established. 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.

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.

VIOLATION OF THESE CONDITIONS, A MISDEMEANOR

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.”

APPEAL PERIOD - EFFECTIVE DATE

This grant is not a permit or license and any permits and/or licenses required by law must be obtained from the proper public agency. If any Condition of this grant is violated or not complied with, then the applicant or their successor in interest may be prosecuted for violating these Conditions the same as for any violation of the requirements contained in the Los Angeles Municipal Code (LAMC).

This determination will become effective after the end of appeal period date on the first page of this document, unless an appeal is filed with the Department of City Planning. An appeal application must be submitted and paid for before 4:30 PM (PST) on the final day to appeal the determination. Should the final day fall on a weekend or legal City holiday, the time for filing an appeal shall be extended to 4:30 PM (PST) on the next succeeding working day. Appeals should be filed early to ensure the Development Services Center (DSC) staff has adequate time to review and accept the documents, and to allow appellants time to submit payment.

An appeal may be filed utilizing the following options:

Online Application System (OAS): The OAS (<https://planning.lacity.org/oas>) allows entitlement appeals to be submitted entirely electronically by allowing an appellant to fill out and submit an appeal application online directly to City Planning's DSC, and submit fee payment by credit card or e-check.

Drop off at DSC. Appeals of this determination can be submitted in-person at the Metro or Van Nuys DSC locations, and payment can be made by credit card or check. City Planning has established drop-off areas at the DSCs with physical boxes where appellants can drop off appeal applications; alternatively, appeal applications can be filed with staff at DSC public counters. Appeal applications must be on the prescribed forms, and accompanied by the required fee and a copy of the determination letter. Appeal applications shall be received by the DSC public counter and paid for on or before the above date or the appeal will not be accepted.

Forms are available online at <http://planning.lacity.org/development-services/forms>. Public offices are located at:

*Metro DSC
(213) 482-7077
201 North Figueroa Street,
4th Floor
Los Angeles, CA 90012
Planning.figcounter@lacity.org*

*Van Nuys DSC
(818) 374-5050
6262 Van Nuys Boulevard,
Suite 251
Van Nuys, CA 91401
Planning.mbc2@lacity.org*

*West Los Angeles DSC
(CURRENTLY CLOSED)
(310) 231-2901
1828 Sawtelle Boulevard,
2nd Floor
Los Angeles, CA 90025
Planning.westla@lacity.org*

City Planning staff may follow up with the appellant via email and/or phone if there are any questions or missing materials in the appeal submission, to ensure that the appeal package is complete and meets the applicable LAMC provisions.

If you seek judicial review of any decision of the City pursuant to California Code of Civil Procedure Section 1094.5, the petition for writ of mandate pursuant to that section must be filed no later than the 90th day following the date on which the City's decision became final pursuant to California Code of Civil Procedure Section 1094.6. There may be other time limits which also affect your ability to seek judicial review.

Verification of condition compliance with building plans and/or building permit applications are done at the City Planning Metro or Valley DSC locations. An in-person or virtual appointment for Condition Clearance can be made through the City's BuildLA portal (appointments.lacity.org). The applicant is further advised to notify any consultant representing you of this requirement as well.



QR Code to Online Appeal Filing



QR Code to Forms for In-Person Appeal Filing



QR Code to BuildLA Appointment Portal for Condition Clearance

Pursuant to LAMC Section 12.22 A.25(g)(2)(i)(f), only an applicant, abutting property owners, and abutting tenants can appeal the TOC portion of this Determination. Pursuant to LAMC Section 16.05, any party can appeal the Site Plan Review 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, increase in FAR, and the appurtenant parking reductions are not a discretionary action and therefore cannot be appealed. Only the requested incentives are appealable. Per Sections 12.22 A.25 and 12.22 A.31 of the LAMC, appeals of Transit Oriented Communities Affordable Housing Incentive Program cases are heard by the City Planning Commission.

Note of Instruction Regarding the Notice of Exception/Determination: Applicant is hereby advised to file the Notice of Determination for the associated SCEA 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 compliance 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

Approved by:

Heather Bleemers
Senior City Planner

Prepared by:

More Song
City Planner

Attachments:
Exhibit A: Architectural Plans

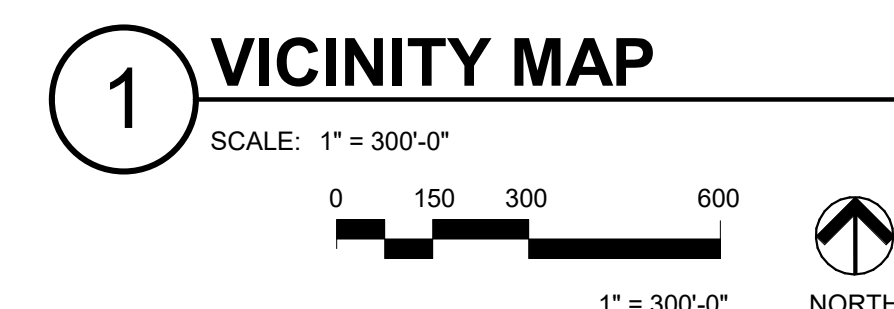
EXHIBIT C

PLANS



1050 LA CIENEGA BOULEVARD

TOC REFERRAL SET
AUGUST 16, 2022









DRAWING INDEX

SHEET NUMBER	SHEET DESCRIPTION
GENERAL	
A0.00	COVER SHEET / DRAWING INDEX / VICINITY MAP
A0.01	SITE DATA
A0.02A	AREA ANALYSIS - PROGRAM AREA
A0.02B	FAR CALC DIAGRAMS
A0.02C	OPEN SPACE DIAGRAMS
A0.02D	BICYCLE PARKING INFORMATION
A0.03	PLOT PLAN
A0.04	EXISTING SITE PHOTOS
A0.05	EXTERIOR RENDERINGS
A0.06	EXTERIOR RENDERINGS
A0.07	EXTERIOR RENDERINGS
CIVIL	
C0.01	ALTA SURVEY (FOR REFERENCE ONLY)
C0.02	ALTA SURVEY (FOR REFERENCE ONLY)
C0.03	ALTA SURVEY (FOR REFERENCE ONLY)
C0.04	ALTA SURVEY (FOR REFERENCE ONLY)
C1.01	TOPOGRAPHIC SURVEY
C1.02	TOPOGRAPHIC SURVEY
C2.01	BACK OF WALK EXHIBIT
C3.01	EXCAVATION PLAN
C4.01	CONCEPTUAL UTILITY PLAN
ARCHITECTURAL	
A1.01	SITE PLAN
A2.00	LEVEL B1 FLOOR PLAN
A2.01	LEVEL 01 FLOOR PLAN
A2.02	LEVEL 02 FLOOR PLAN
A2.03	LEVEL 03 FLOOR PLAN
A2.04	LEVELS 04-11 FLOOR PLAN
A2.12	LEVELS 12-22 FLOOR PLAN
A2.23	LEVEL 23 FLOOR PLAN
A2.24	LEVEL 24 - SKYDECK FLOOR PLAN
A2.25	ROOF LEVEL FLOOR PLAN
A3.01	BUILDING ELEVATIONS
A3.02	BUILDING ELEVATIONS
A3.03	BUILDING ELEVATIONS
A3.04	BUILDING SECTIONS
A3.05	BUILDING SECTIONS
LANDSCAPE	
L1.01	LEVEL 01 - LANDSCAPE PLAN
L1.03	LEVEL 03 - LANDSCAPE PLAN
L1.24	LEVEL 24 - LANDSCAPE PLAN

NOTE:

TREE SURVEY NOT PROVIDED. THERE ARE NO EXISTING TREES ON SITE.
DEMOLITION PLAN NOT PROVIDED. SITE IS VACANT.

-  PROJECT SITE - 1050 LA CIENEGA
-  METRO BUS STOP - RTE. 105 CIENEGA/
-  FUTURE METRO RAIL STATION - WILSHIRE / LA CIENEGA
-  METRO BUS ROUTE 105 NORTHBOUND
-  METRO BUS ROUTE 105 SOUTHBOUND
-  METRO RAIL D (PURPLE) LINE EXTENSION



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RIOS

EXHIBIT A
DIR-2022-2279-TOC-SPR-VHCA
PAGE 1 OF 38

NO.	DATE	DESCRIPTION

1050 LA CIENEGA

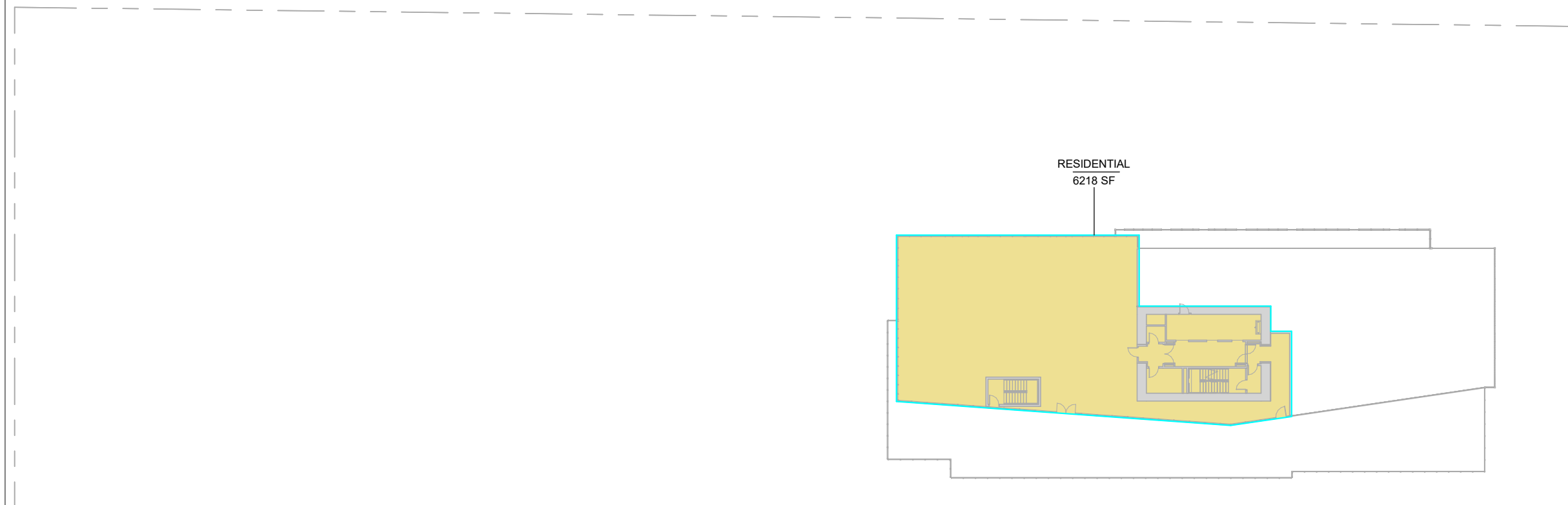
1066 LA CIENEGA BLVD
LOS ANGELES, CA 90035

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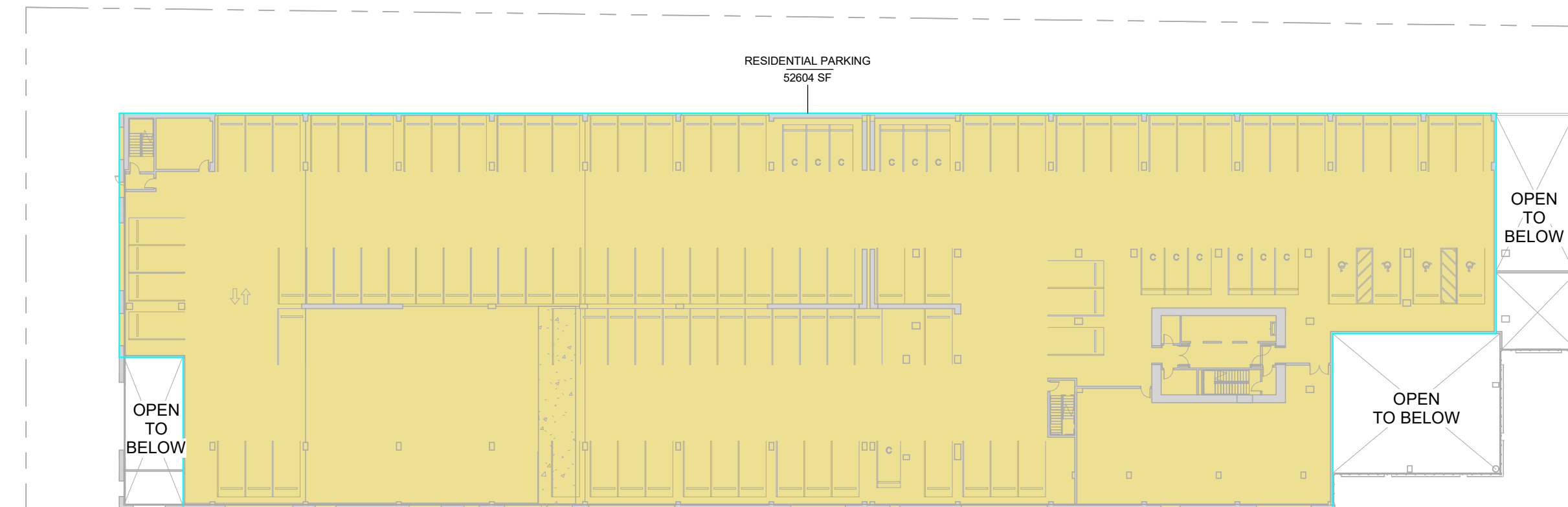
**COVER SHEET /
DRAWING INDEX /
VICINITY MAP**

Project Number: 2021034

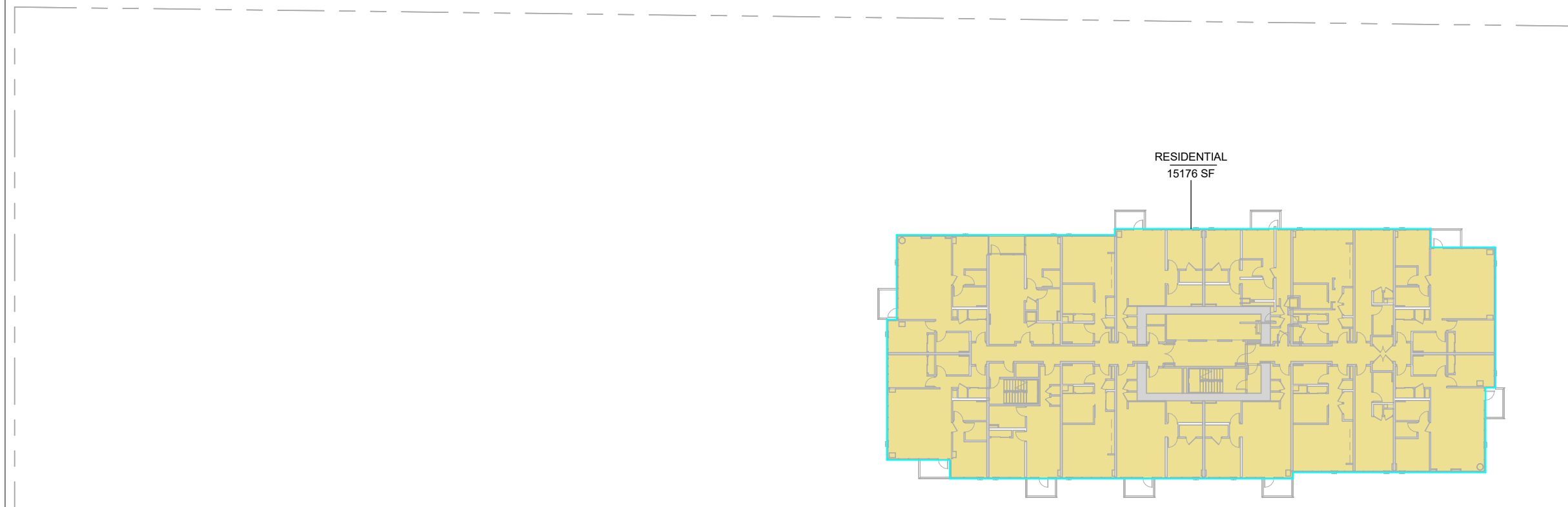
Sheet Number: **A0.00**



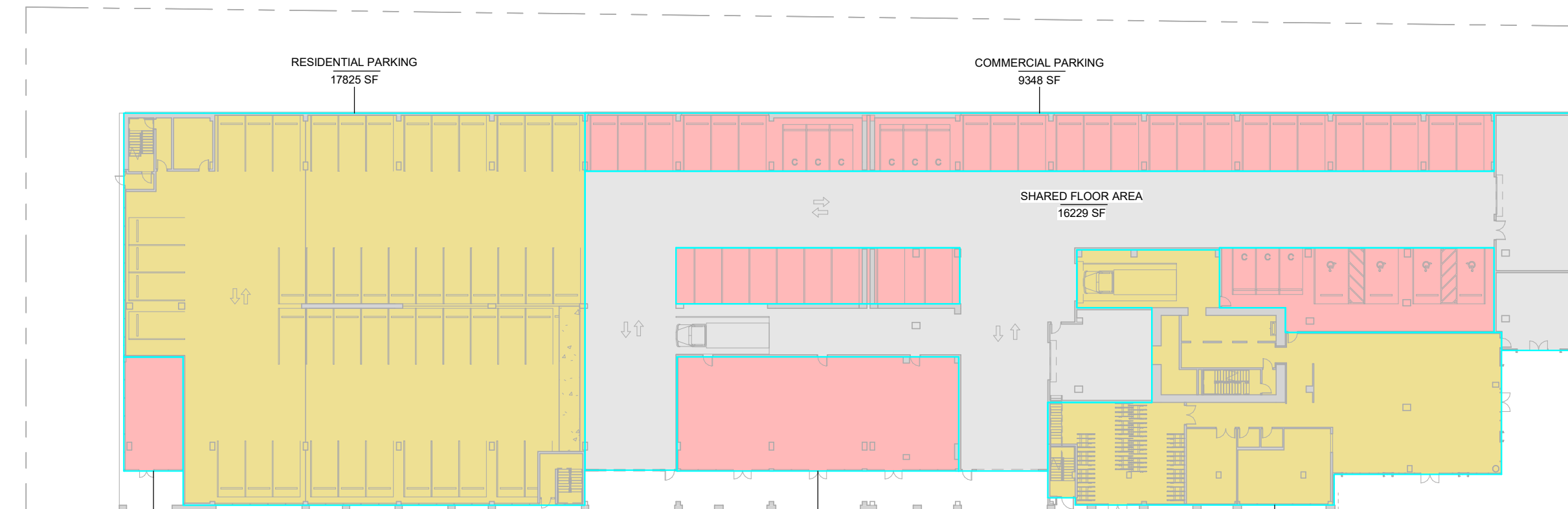
6 BUILDING AREA - LEVEL 24 SKYDECK
SCALE: 1" = 40'-0"



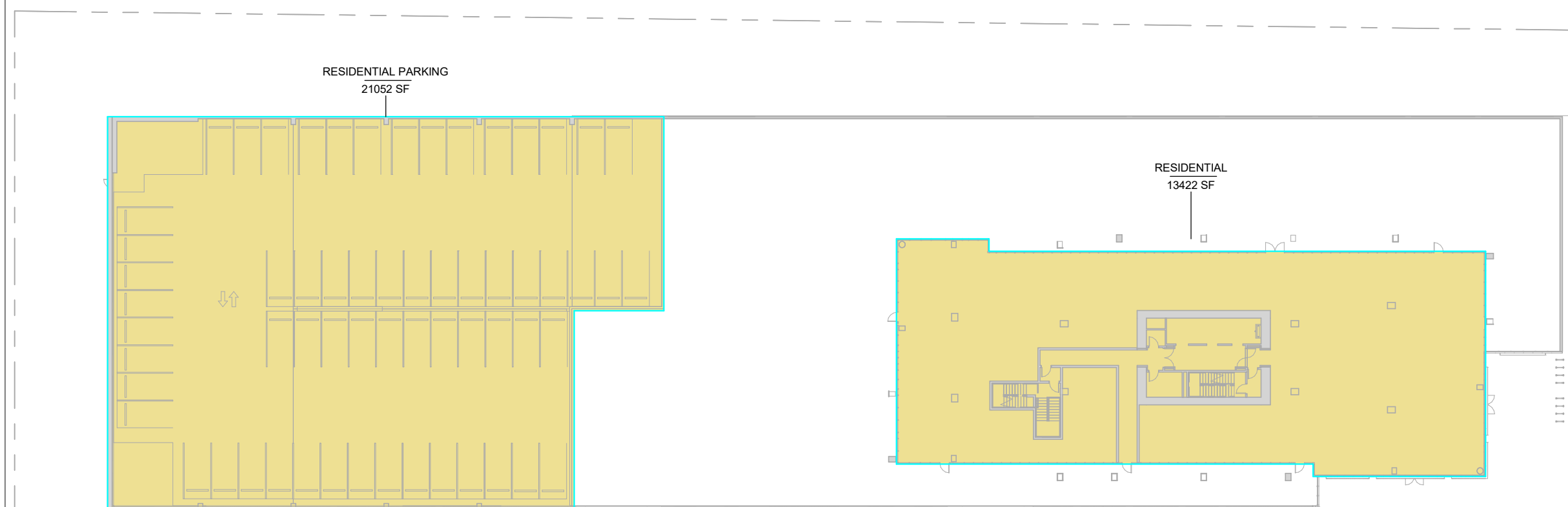
3 BUILDING AREA - LEVEL 02
SCALE: 1" = 40'-0"



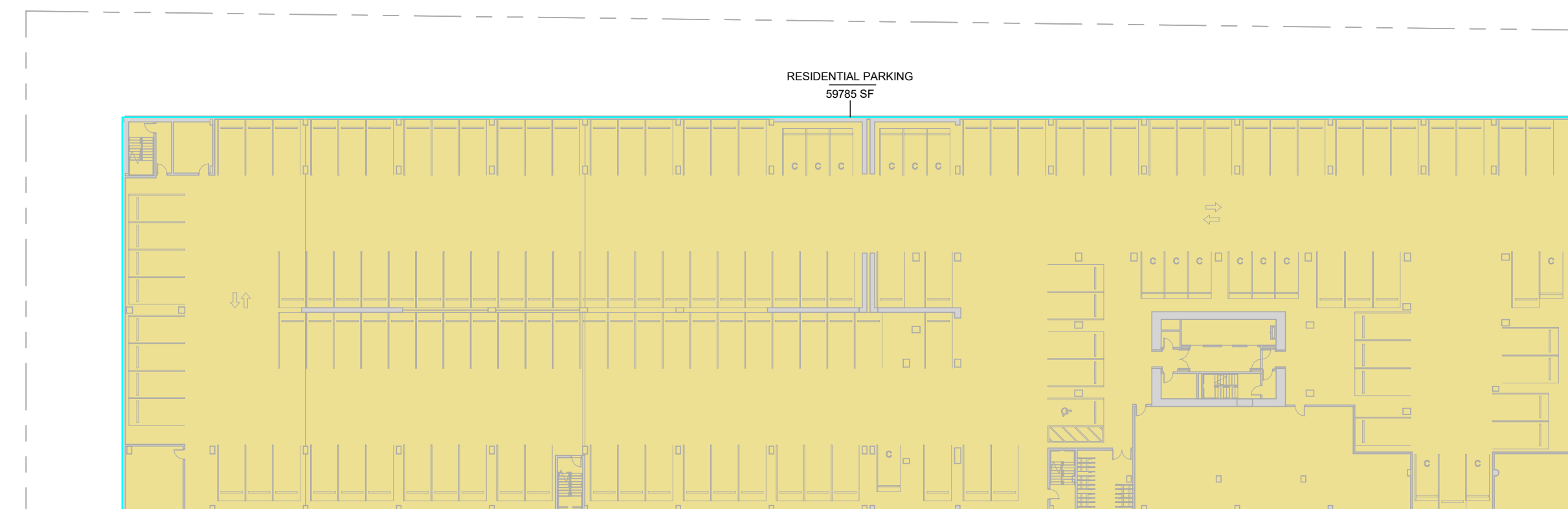
5 BUILDING AREA - LEVELS 04-23
SCALE: 1" = 40'-0"



2 BUILDING AREA - LEVEL 01
SCALE: 1" = 40'-0"



4 LEVEL 03 - FLOOR AREA
SCALE: 1" = 40'-0"



1 BUILDING AREA - LEVEL B1
SCALE: 1" = 40'-0"

Building Area Analysis: Calculation Table			
Floor Area (non-parking)			
	Residential Floor Area	Non-residential Floor Area	Total
Level 01	8,005	4035	12,040
Level 03	13,422	0	13,422
Level 04	15,176	0	15,176
Level 05	15,176	0	15,176
Level 06	15,176	0	15,176
Level 07	15,176	0	15,176
Level 08	15,176	0	15,176
Level 09	15,176	0	15,176
Level 10	15,176	0	15,176
Level 11	15,176	0	15,176
Level 12	15,176	0	15,176
Level 13	15,176	0	15,176
Level 14	15,176	0	15,176
Level 15	15,176	0	15,176
Level 16	15,176	0	15,176
Level 17	15,176	0	15,176
Level 18	15,176	0	15,176
Level 19	15,176	0	15,176
Level 20	15,176	0	15,176
Level 21	15,176	0	15,176
Level 22	15,176	0	15,176
Level 23	15,176	0	15,176
Level 24	6,218	0	6,218
Totals	331,165	4035	335,200
Ratios	0.987962411	0	100%
Shared Floor Area (non-parking)			
	Residential Floor Area	Non-residential Floor Area	Total
Level 03	0	0	0
Level 04-23	0	0	0
Level 24	0	0	0
Total Shared	0	0	0
Ratios	0	0	0
Floor Area (parking)			
	Residential Floor Area	Non-residential Floor Area	Shared Floor Area
Level B1	59,785	0	0
Level 01	17,825	9,348	16,229
Level 02	52,604	0	0
Level 03	21,052	0	0
Totals	151,266	9348	16229
Parking Spaces using shared facilities			
	Residential Parking Spaces	Non-residential Parking Spaces	Total Parking Spaces
Total Qty	384	28	412
Ratios	0.93	0.07	
	384	28	
GRAND TOTALS			
	Residential Floor Area	Non-residential Floor Area	Grand Total
Total Qty	482,431	9348	491,779
Total Ratios	0.98	0.02	

LEGEND

- SHARED AREA
- COMMERCIAL AREA
- RESIDENTIAL AREA



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NO.	DATE	DESCRIPTION

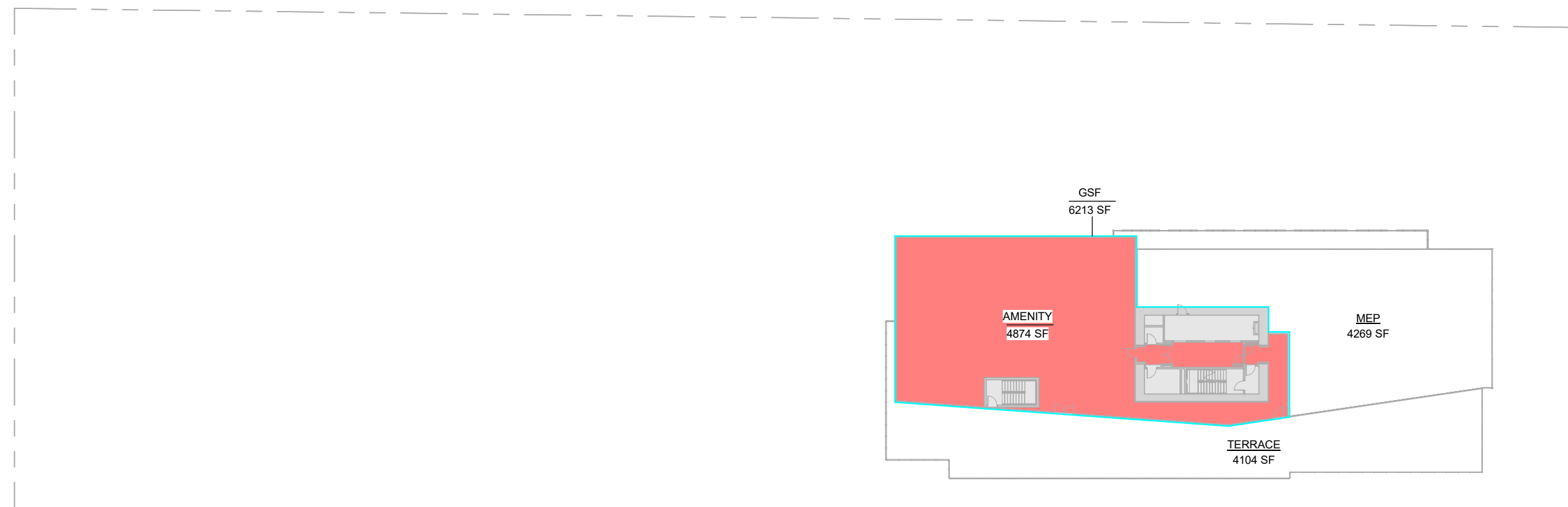
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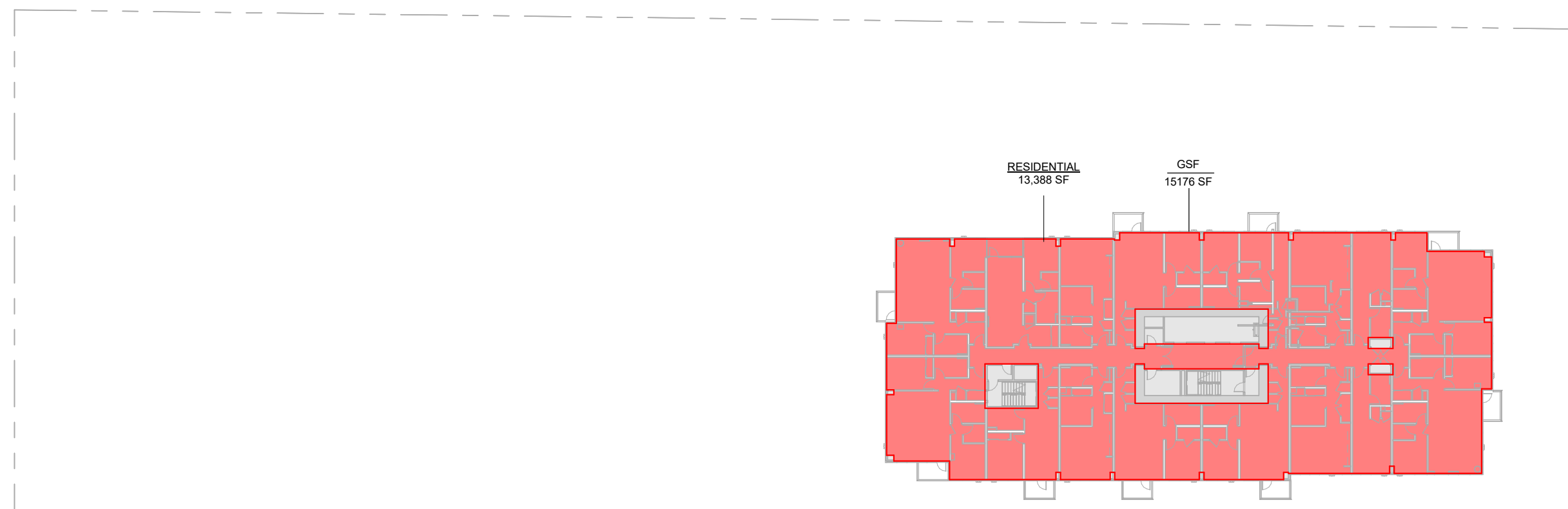
AREA ANALYSIS - PROGRAM AREA

Project Number: 2021034

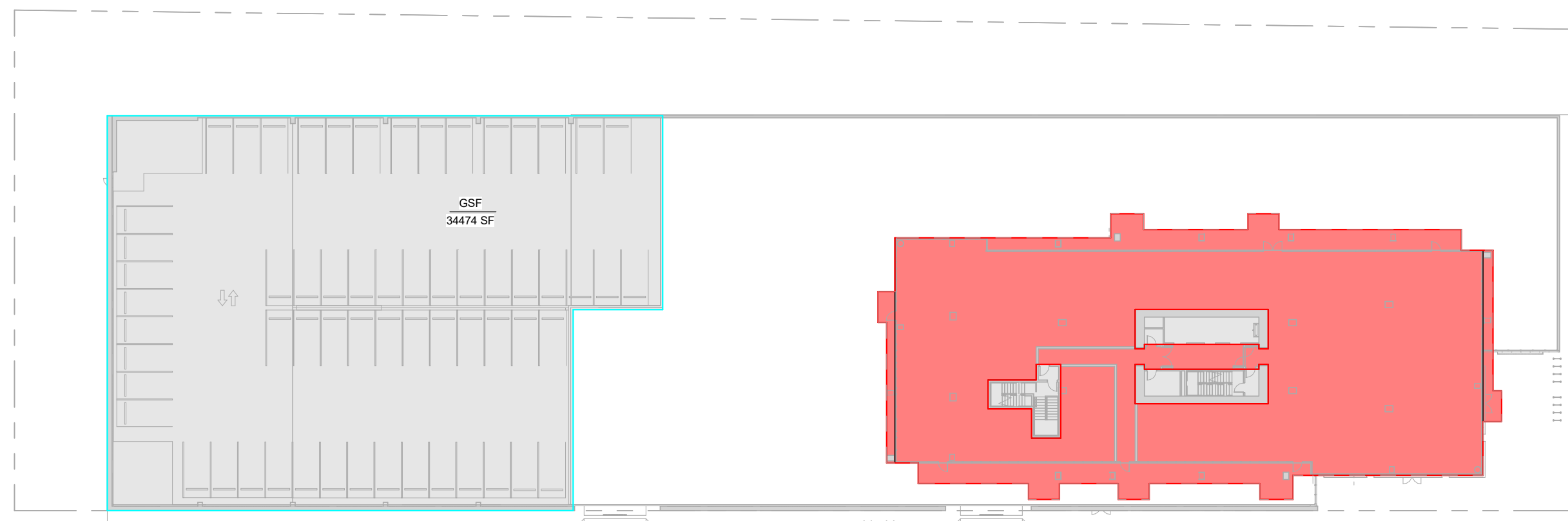
Sheet Number: **A0.02A**



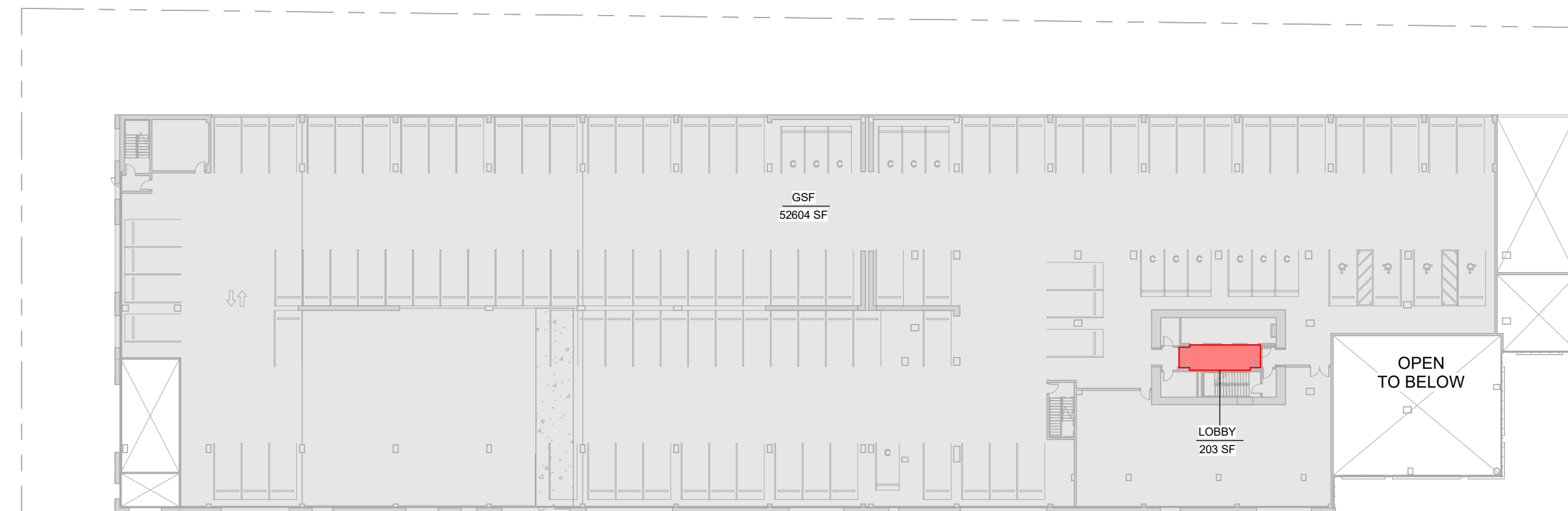
6 LEVEL 24 - SKYDECK - FLOOR AREA
SCALE: 1" = 40'-0"



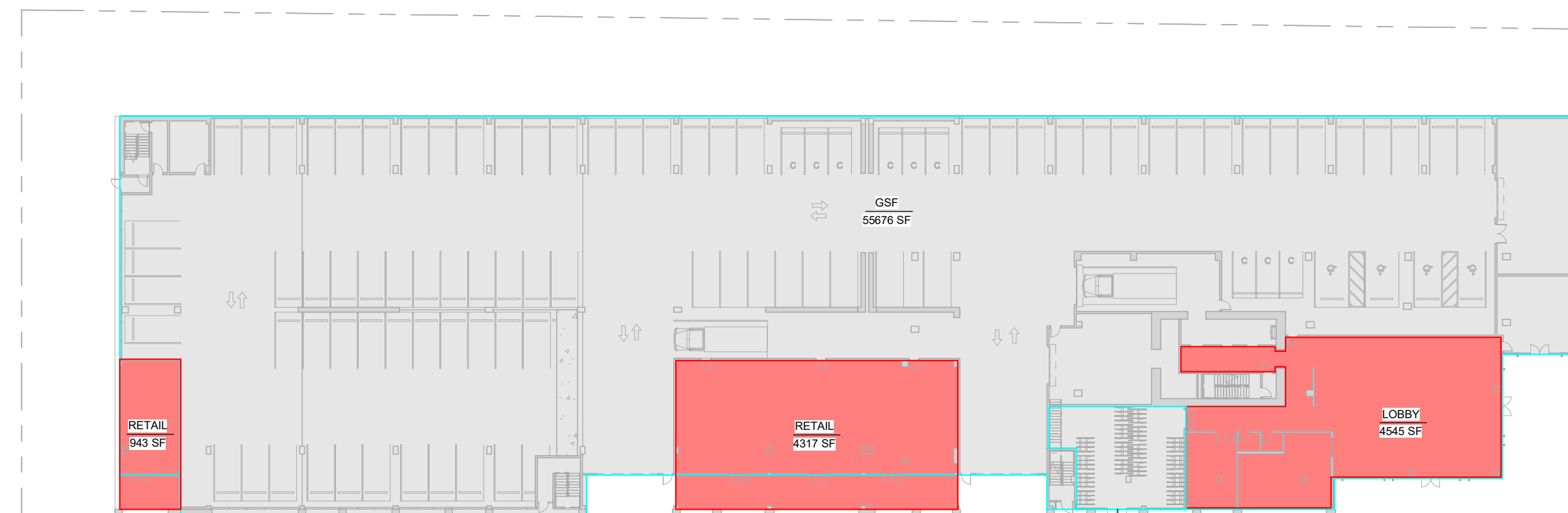
5 LEVELS 04 - 23 - FLOOR AREA
SCALE: 1" = 40'-0"



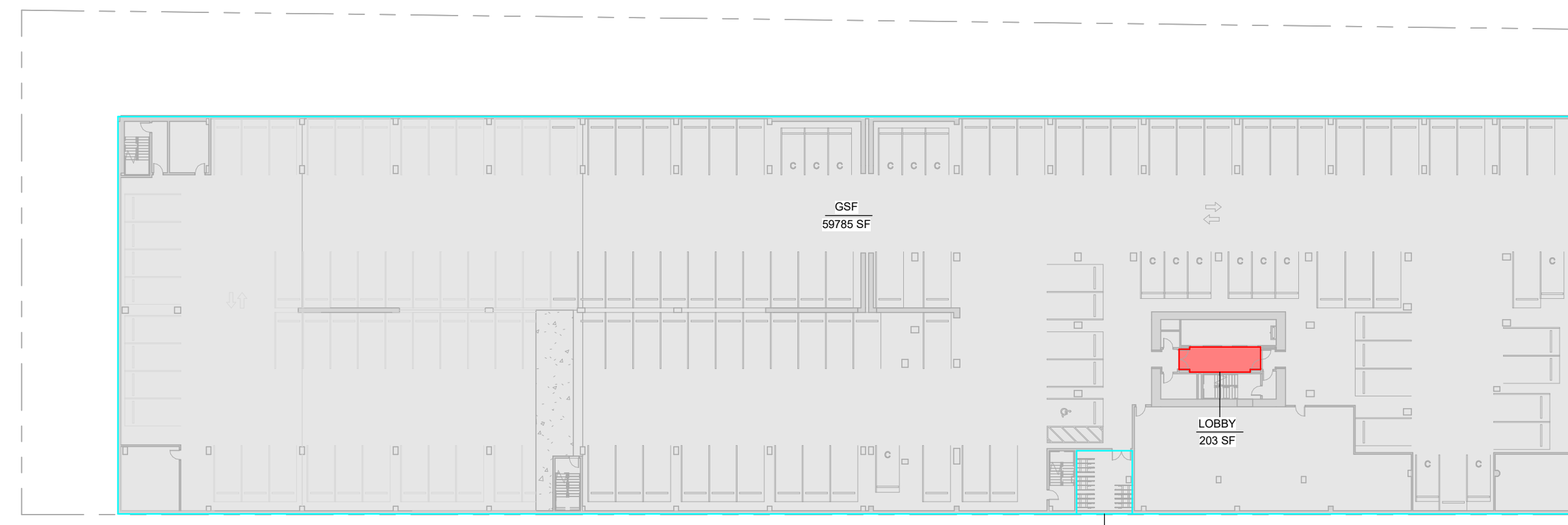
4 LEVEL 03 - FLOOR AREA
SCALE: 1" = 40'-0"



3 LEVEL 02 - FLOOR AREA
SCALE: 1" = 40'-0"



2 LEVEL 01 - FLOOR AREA
SCALE: 1" = 40'-0"

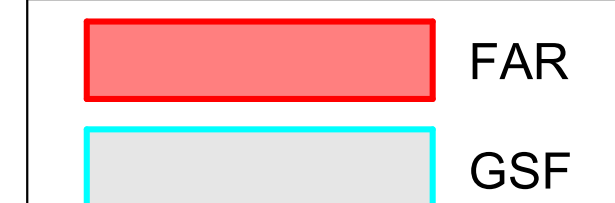


1 LEVEL B1 - FLOOR AREA
SCALE: 1" = 40'-0"

FLOOR AREA BY LEVEL

fir. Elev.	f/f Fir.	M,PH	FLOOR AREA BY LEVEL	
			FLOOR AREA PER ZONING CODE	FLOOR AREA PER BUILDING CODE
			GSF	GSF
+270.83				
+251.83	19	RF		
+239.83	12	SKY	4,874	6,213
+227.17	12.67	23	13,502	15,176
+216.50	10.67	22	13,408	15,176
+205.83	10.67	21	13,408	15,176
+195.17	10.67	20	13,408	15,176
+184.50	10.67	19	13,408	15,176
+174.83	9.67	18	13,408	15,176
+165.17	9.67	17	13,408	15,176
+155.50	9.67	16	13,408	15,176
+145.83	9.67	15	13,408	15,176
+136.17	9.67	14	13,408	15,176
+126.50	9.67	13	13,408	15,176
+116.83	9.67	12	13,408	15,176
+107.17	9.67	11	13,388	15,176
+97.50	9.67	10	13,388	15,176
+87.83	9.67	09	13,388	15,176
+78.17	9.67	08	13,388	15,176
+68.50	9.67	07	13,388	15,176
+58.83	9.67	06	13,388	15,176
+49.17	9.67	05	13,388	15,176
+39.50	9.67	04	13,388	15,176
+25.50	14.00	03	14,492	34,474
+14.00	11.50	02	203	52,604
+0.00	14.00	01	9,814	55,676
+10.00	-12.00	B1	203	59,785
			297,680	512,272
			GSF	GSF

LEGEND



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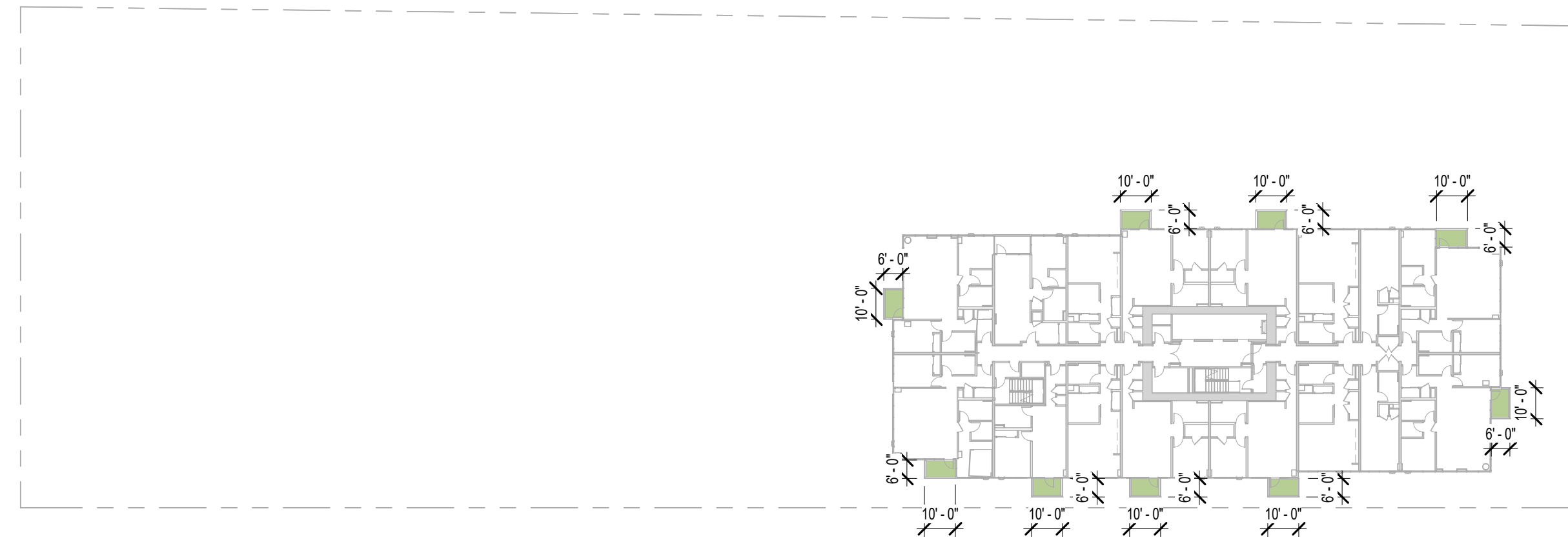
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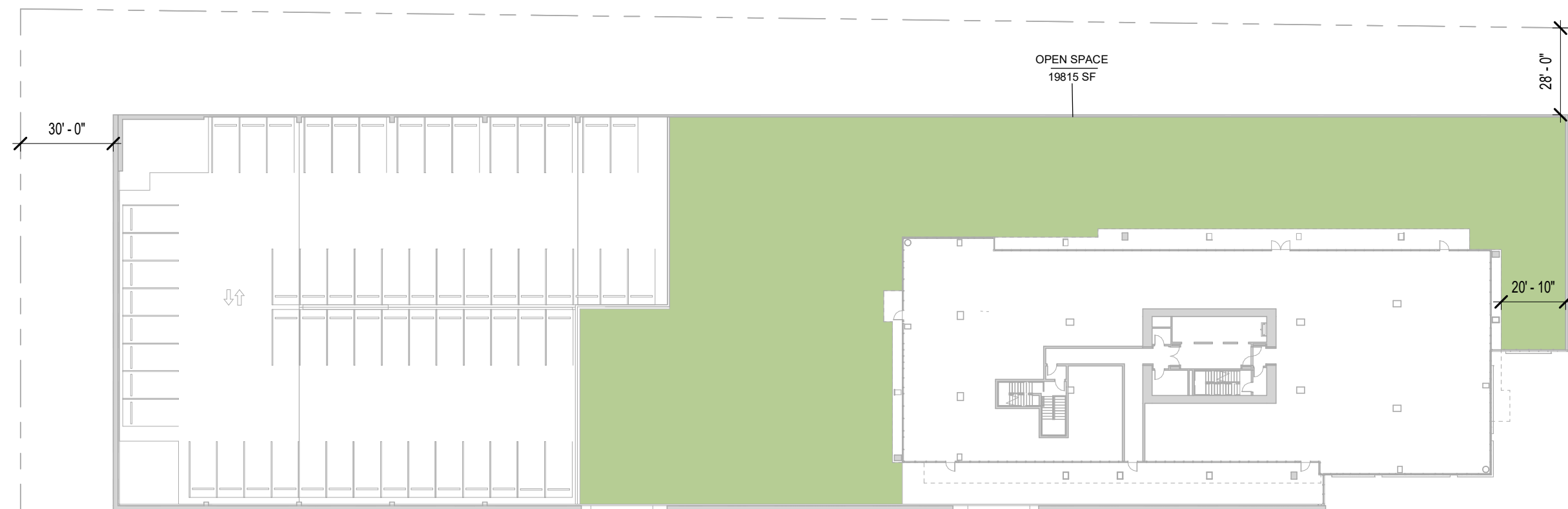
**FAR CALC
DIAGRAMS**

Project Number: 2021034

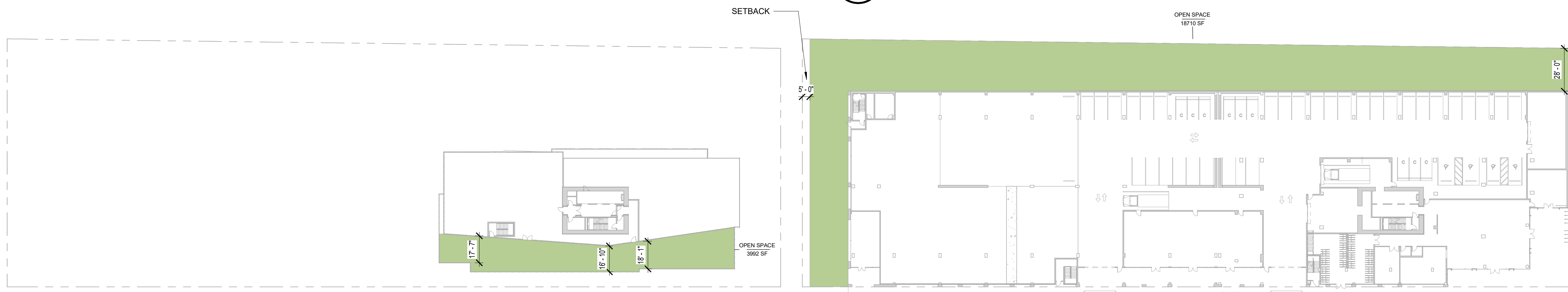
Sheet Number: **A0.02B**



3 LEVELS 04-23 OPEN SPACE
SCALE: 1" = 40'-0"



2 LEVEL 03 - OPEN SPACE
SCALE: 1" = 40'-0"



1 LEVEL 01 - OPEN SPACE
SCALE: 1" = 40'-0"

4 LEVEL 24 SKYDECK - OPEN SPACE
SCALE: 1" = 40'-0"

OPEN SPACE CALCULATIONS

LEVEL	OPEN SPACE
BALCONIES 180 @ 50 SF	9,000 SF
LEVEL 24	3,992 SF
LEVEL 03	19,815 SF
LEVEL 01	18,710 SF
TOTAL	51,517 SF
	41,550 SF REQ.

LEGEND

 OPEN SPACE



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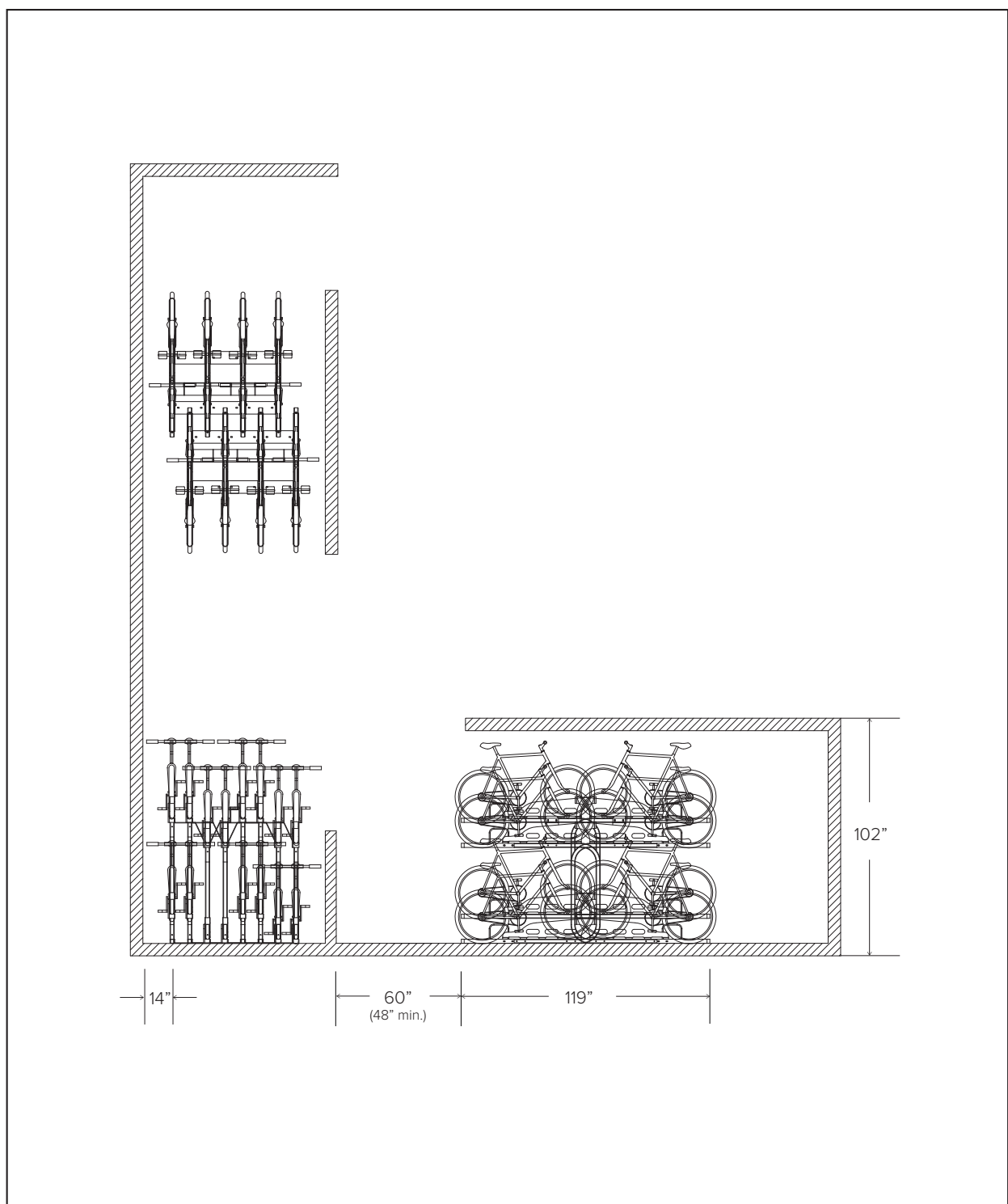
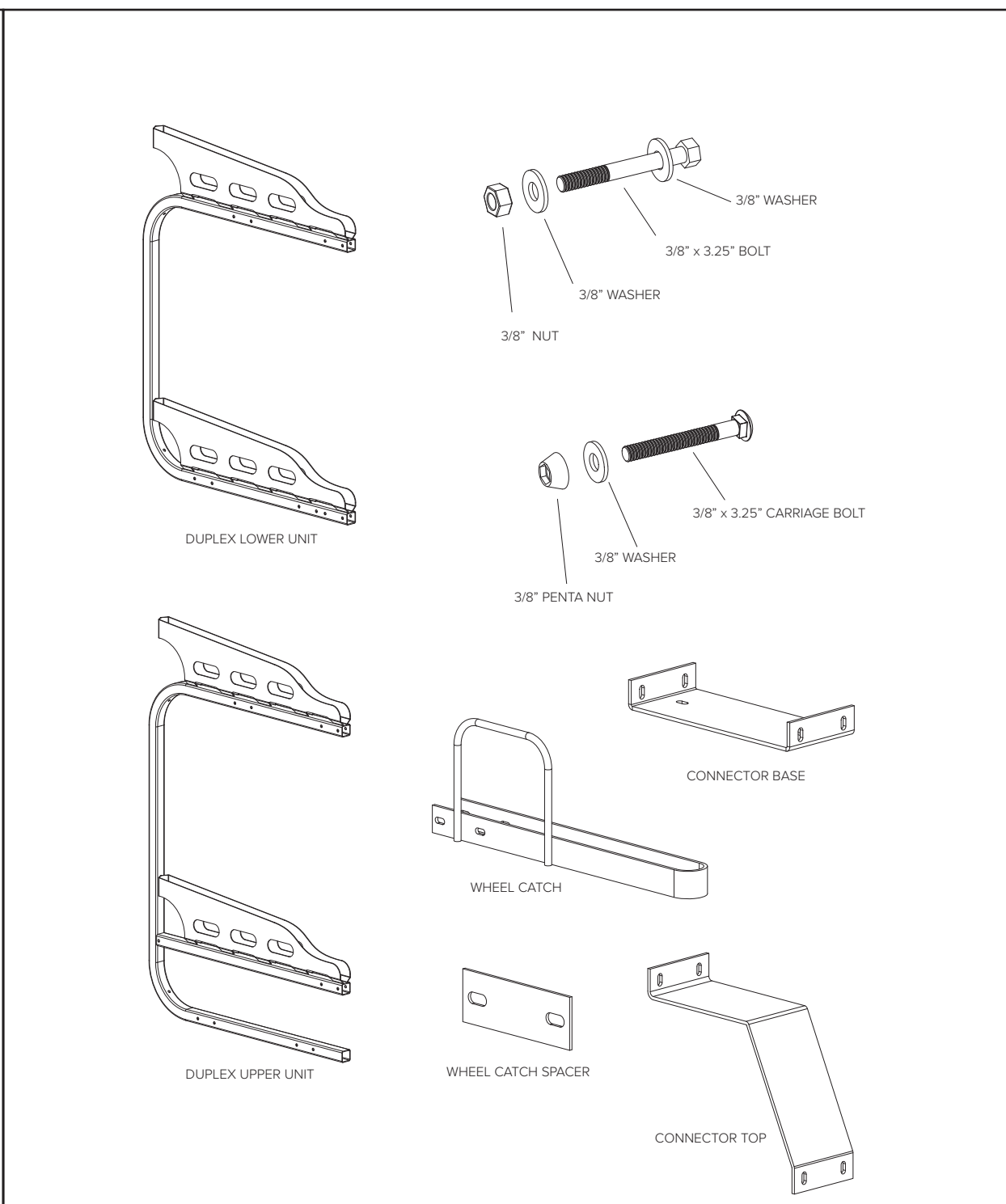
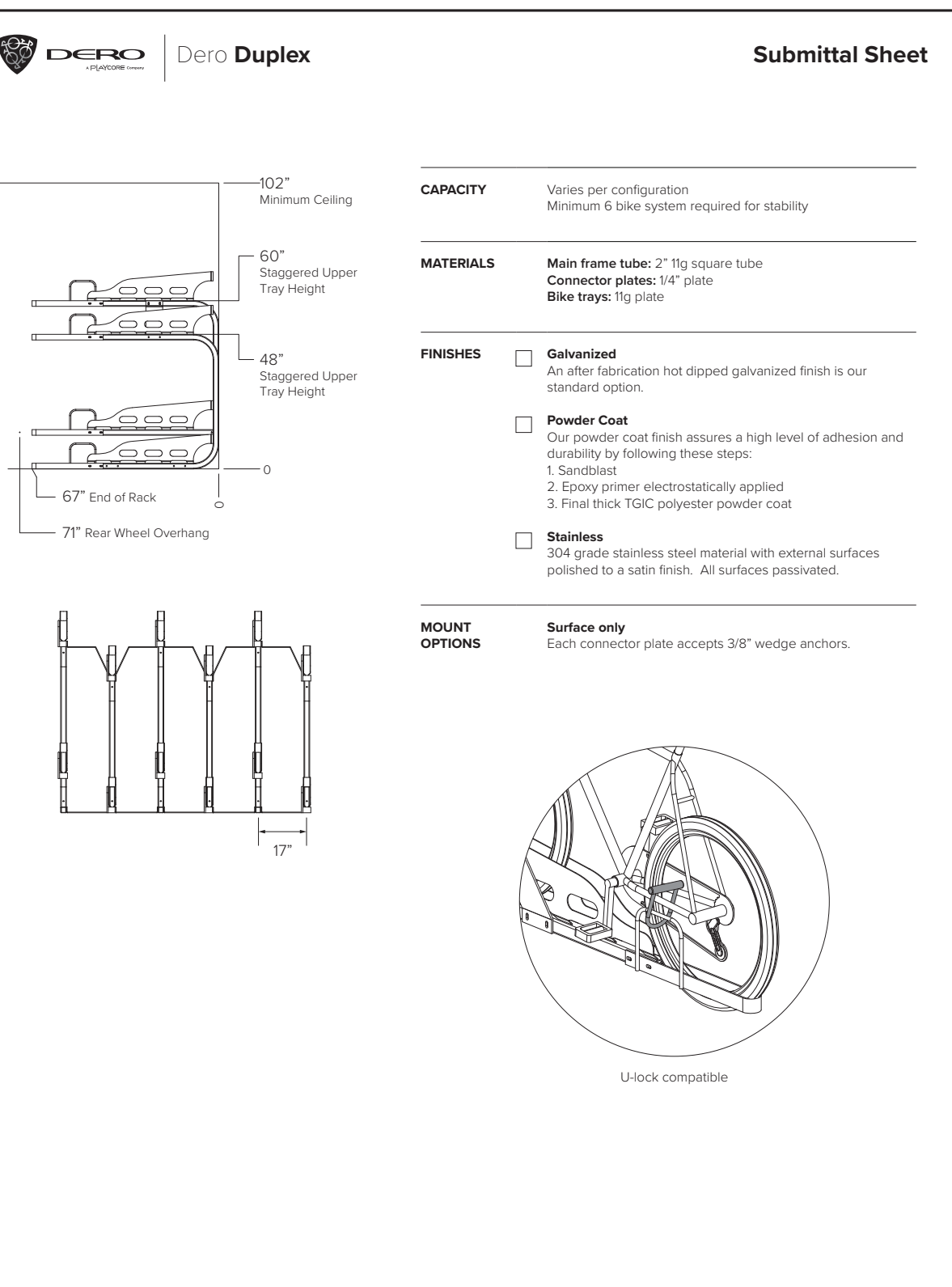
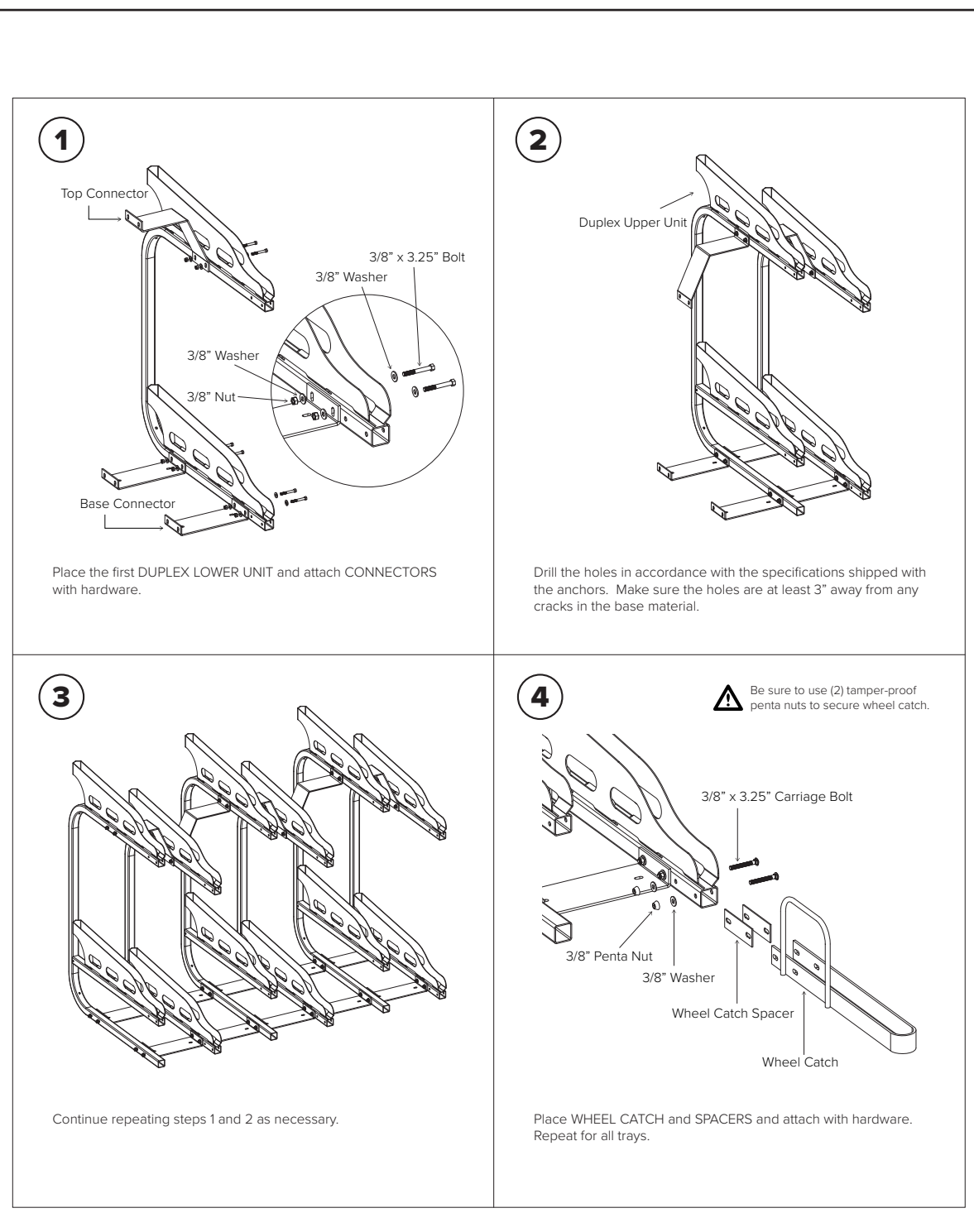
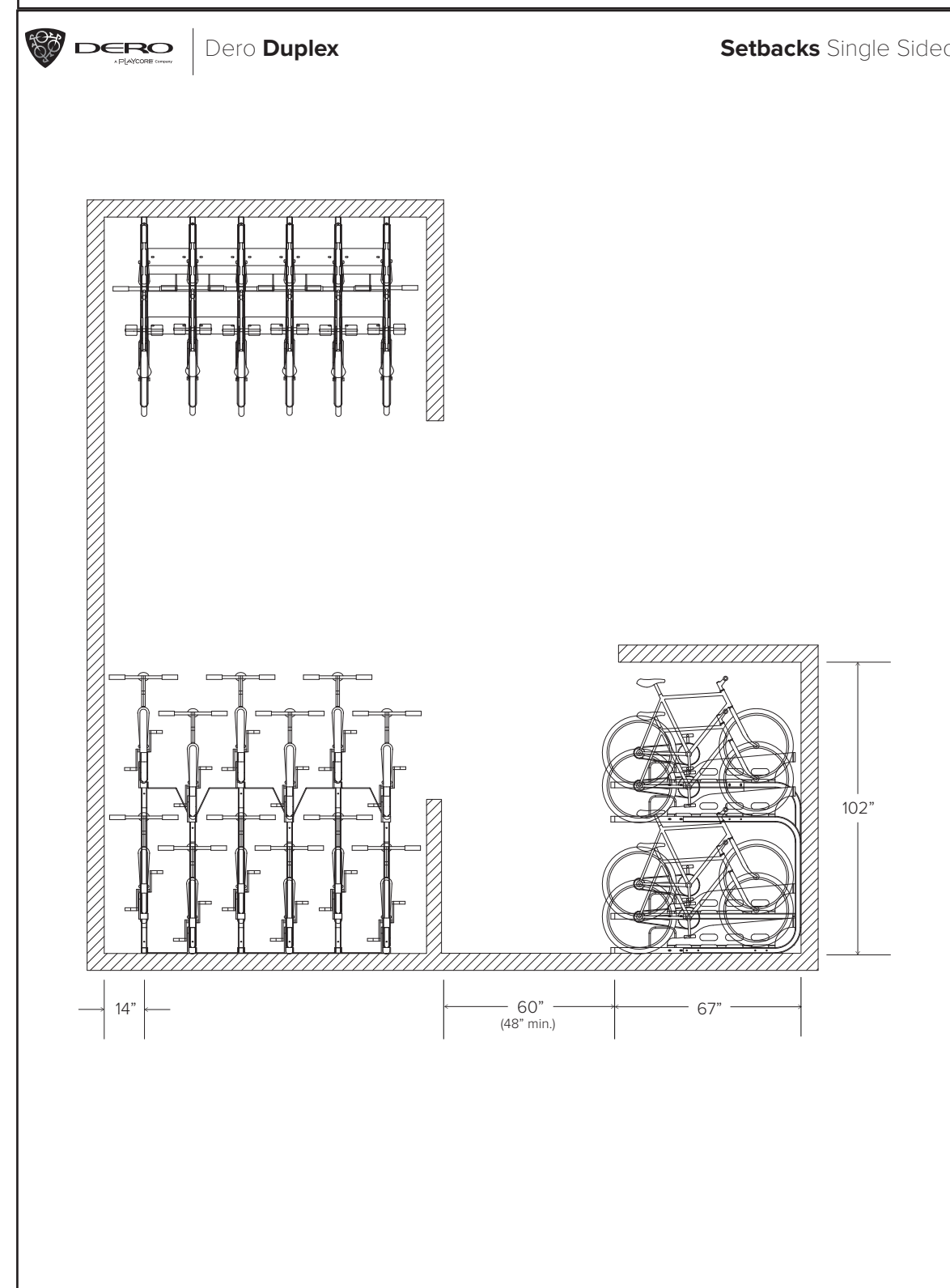
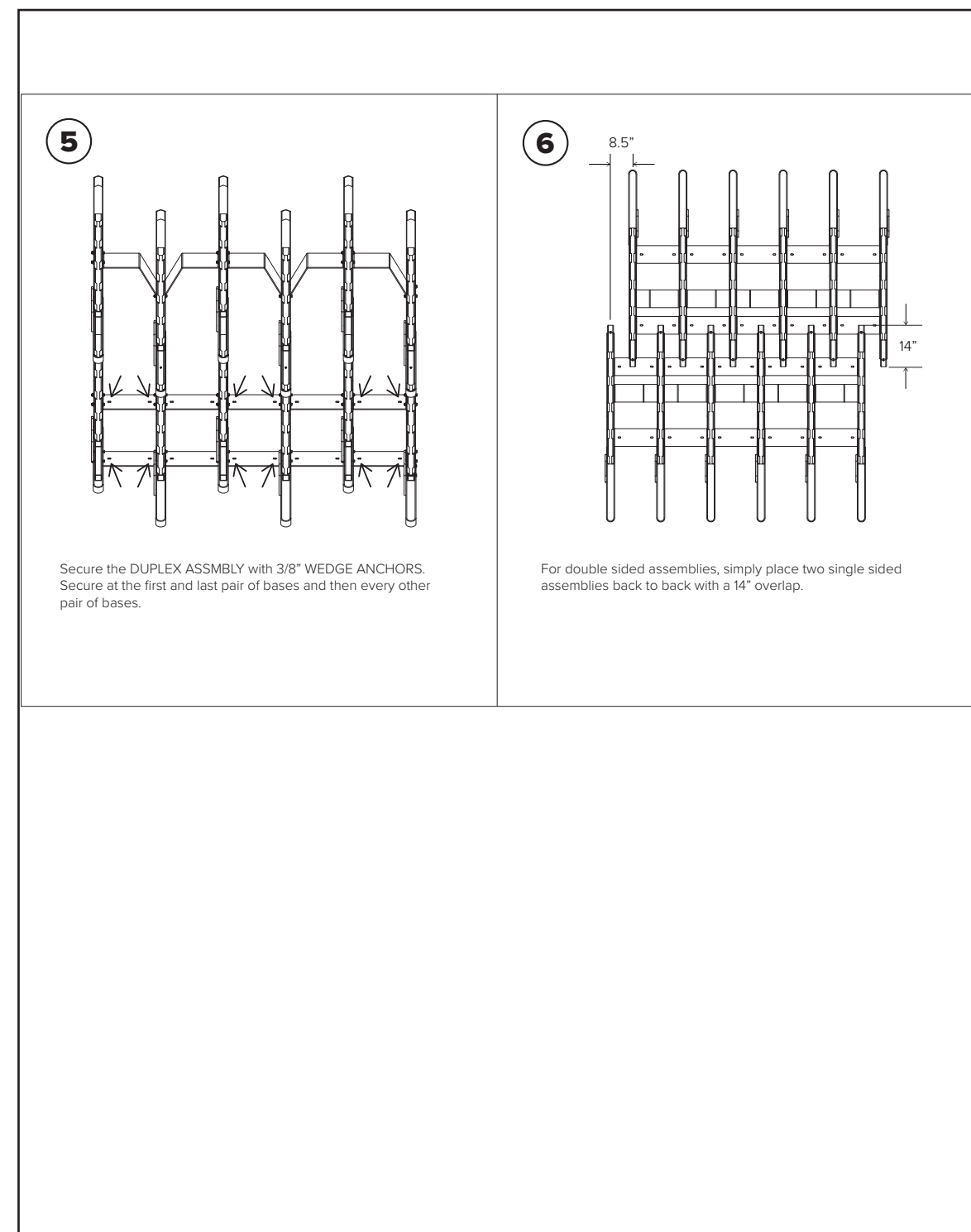
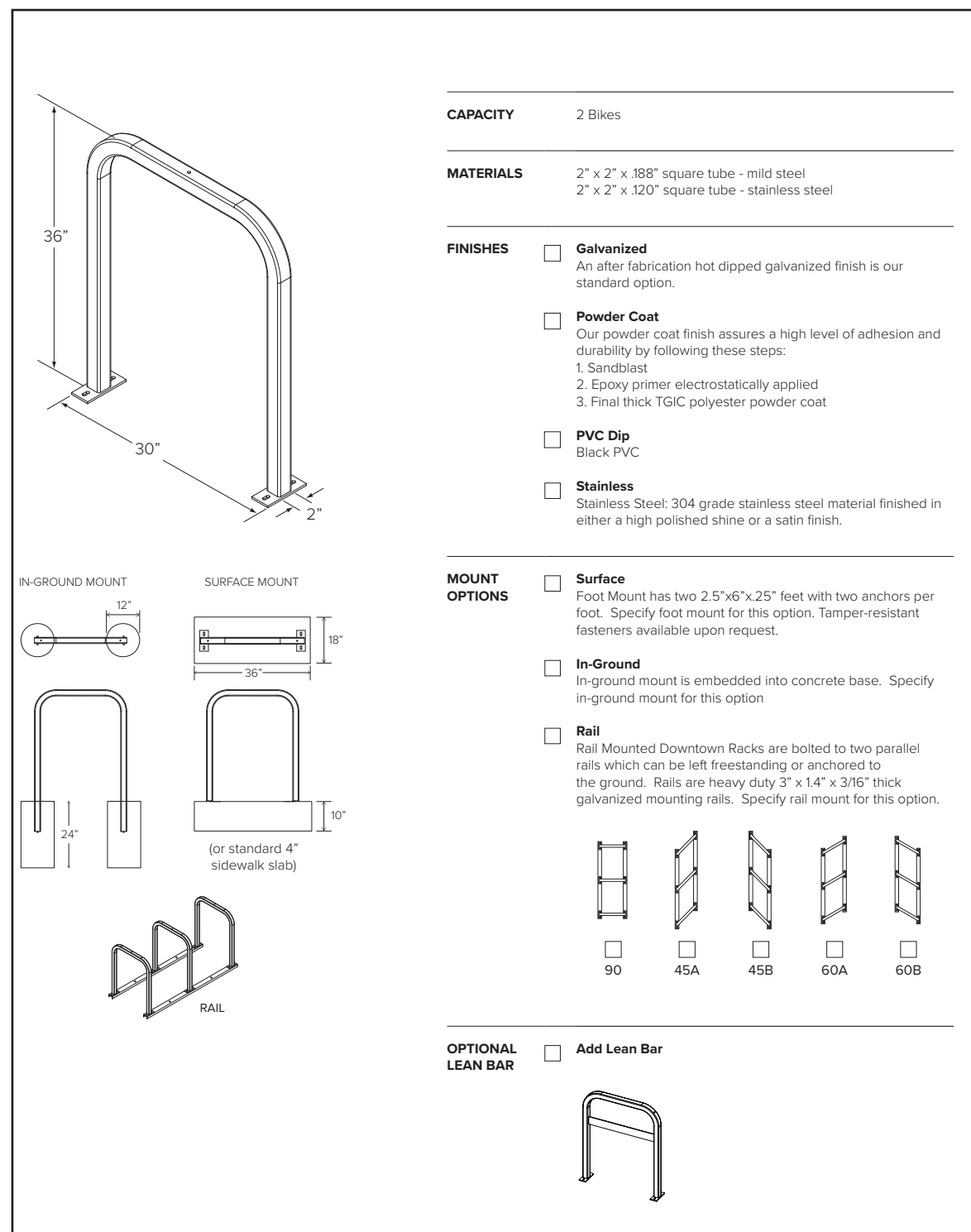
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**OPEN SPACE
DIAGRAMS**

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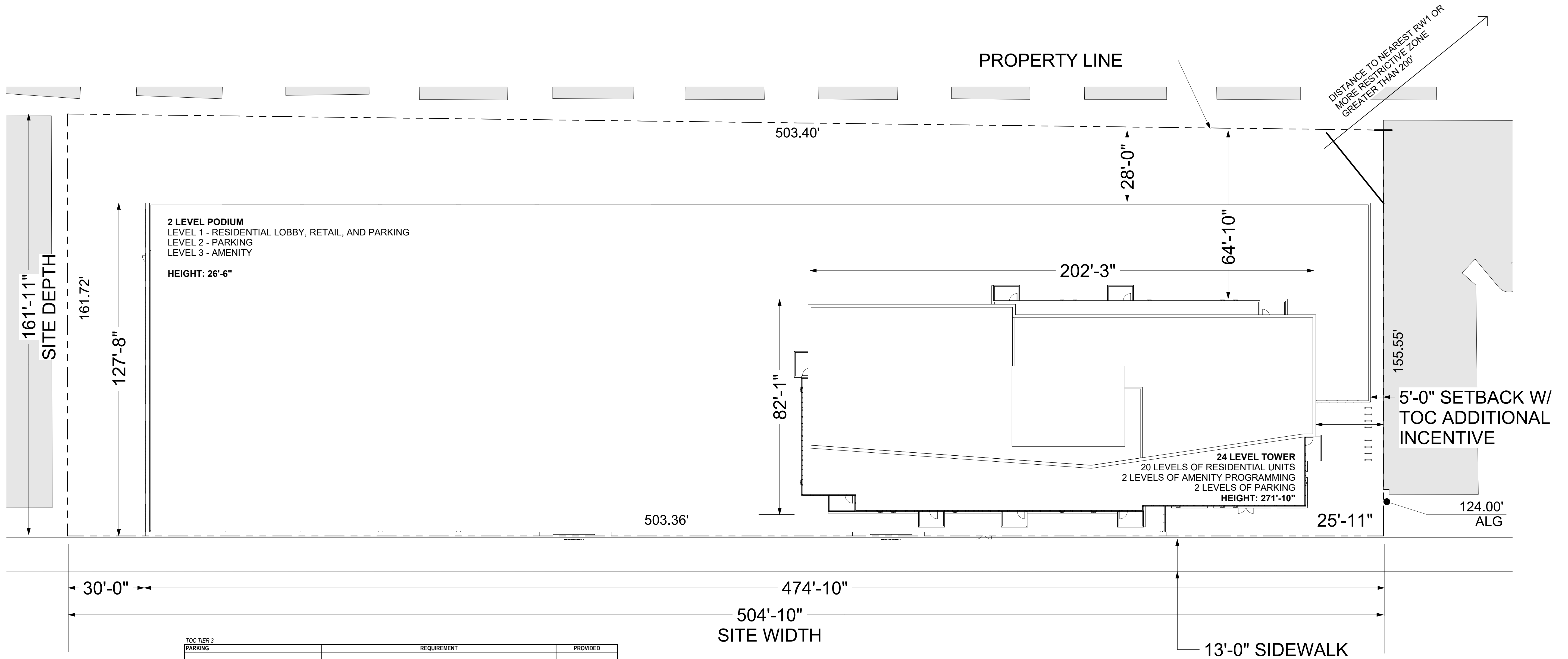
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**BICYCLE PARKING
INFORMATION**

Project Number: 2021034

Sheet Number: **A0.02D**



SITE DESCRIPTION
DWELLING UNITS: 290

TOC TIER 3		
PARKING	REQUIREMENT	PROVIDED
RESIDENTIAL PARKING	0.5 SPACE PER UNIT (TOC TIER 3): 0.5 X 290 = 145 SPACES	384 SPACES
COMMERCIAL PARKING	1 SPACE PER 100 SF TOC TIER 30% REDUCTION THEN APPLIED: 39 (1 PER 100 SF) - 11 (30%) = 28 SPACES	28 SPACES
		412 SPACES

PROVIDED PARKING DETAILS					
	STANDARD	COMPACT	ACCESSIBLE	USPS	TOTAL
LEVEL 3 PARKING	59	0	0	0	59
LEVEL 2 PARKING	95	13	4	0	112
LEVEL 1 PARKING	78	9	4	1	92
BT PARKING	132	16	1	0	149
					412

LOS ANGELES MUNICIPAL CODE Table 12.21 A.16(a)(1)(ii)		
BICYCLE PARKING (RESIDENTIAL)		PROVIDED
SHORT-TERM		15 SPACES REQUIRED
Short Term		
1-25 units = 1 per 10 units (2.5 spaces)		
26-100 units = 1 per 15 units (6 spaces)		
101-200 = 1 per 20 units (5 spaces)		
201+ = 1 per 40 units (2.25 spaces)		
Total short term = 15 spaces		
LONG-TERM		147 SPACES REQUIRED
Long Term		
1-25 units = 1 per unit (25 spaces)		
26-100 units = 1 per 1.5 units (60 spaces)		
101-200 units = 1 per 2 units (50 spaces)		
201+ units = 1 per 4 units (22.5 spaces)		
Total long term = 147 spaces		160
BICYCLE PARKING (COMMERCIAL)		6 SPACES REQUIRED
SHORT-TERM		1 SPACE FOR 2000SF = 3 SPACES
LONG-TERM		1 SPACE PER 2000SF = 3 SPACES
		4
		4
		184

LA CIENEGA BOULEVARD

LEGAL DESCRIPTION: REF. TO ALTA SURVEY PROVIDED ON CIVIL DRAWINGS

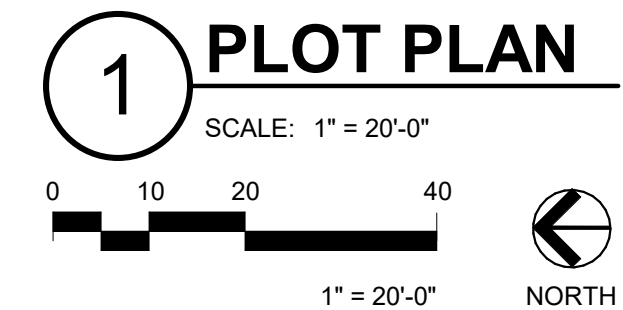
TRACT 7170:
LOTS 119, 120, 121, 122

TRACT 7171:
LOTS 233, 234, 235, 237

BLOCK: NONE

PROJECT ADDRESS:
1066 S LA CIENEGA BOULEVARD
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DEDICATIONS:
NO DEDICATIONS REQUIRED



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PLOT PLAN

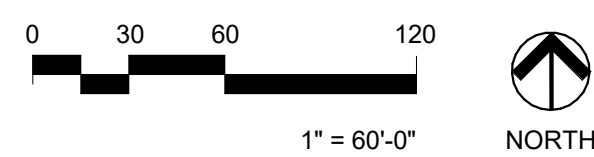
Project Number: 2021034

Sheet Number: **A0.03**



1 SITE CONTEXT

SCALE: 1" = 60'-0"



1 VIEW OF NORTH END OF SITE



2 VIEW LOOKING TOWARDS EAST SIDE OF SITE



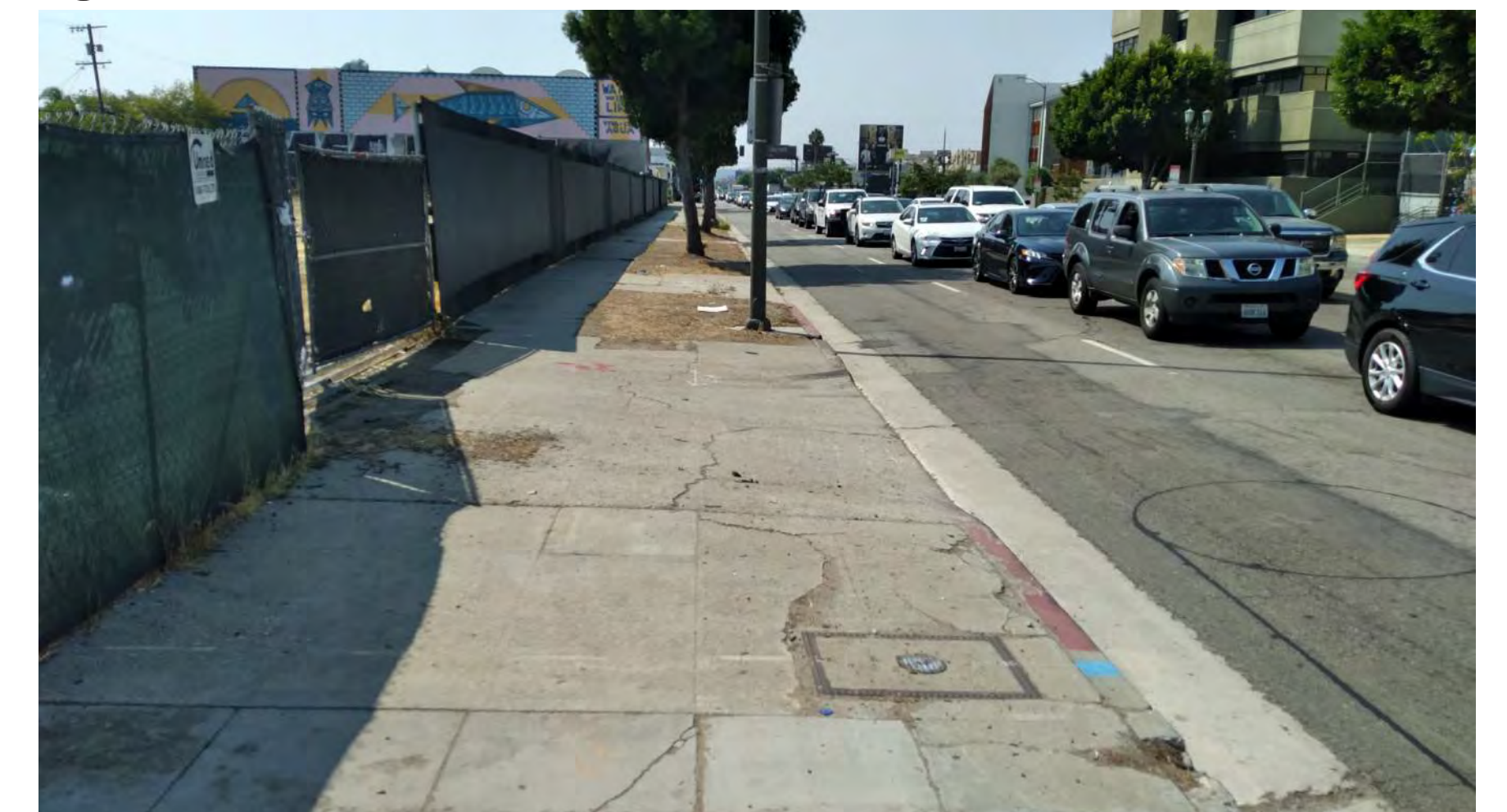
3 VIEW LOOKING TOWARDS SOUTH END OF SITE



4 VIEW LOOKING TOWARDS WEST SIDE OF SITE



5 VIEW OF WEST SIDE OF SITE LOOKING NORTH



6 VIEW FROM WEST SITE FRONTAGE LOOKING SOUTH DOWN LA CIENEGA



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**EXISTING SITE
PHOTOS**

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Sheet Number: **A0.04**



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**EXTERIOR
 RENDERINGS**

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**EXTERIOR
 RENDERINGS**

Project
 Number: 2021034

Sheet
 Number: **A0.06**



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**EXTERIOR
 RENDERINGS**

Project Number: 2021034

Sheet Number: **A0.07**

ZONING INFORMATION

ZONING REPORT PROVIDED BY: PARTNER ENGINEERING AND SCIENCE DATE OF REPORT: JUNE 08, 2021 PARTNER PROJECT NUMBER: 21-321356.1 ZONING DESIGNATION: "C2-O" COMMERCIAL ZONE - HEIGHT DISTRICT NO. 1 - OL DRILLING DISTRICT CURRENT PROPERTY USE: VACANT LAND PROPOSED PROPERTY USE: SENIOR FACILITY MINIMUM FRONT YARD SETBACK: NOT REQUIRED MINIMUM SIDE YARD SETBACK: NOT REQUIRED FOR BUILDINGS ERECTED AND USED EXCLUSIVELY FOR COMMERCIAL PURPOSES...

FLOOD ZONE

A FIELD SURVEY WAS NOT CONDUCTED TO DETERMINE THE FLOOD ZONE AREAS. ANY FLOOD ZONE LINES DISTINGUISHING BETWEEN FLOOD AREAS ARE GRAPHICALLY PLOTTED FROM FEMA FLOOD INSURANCE RATE MAPS (FIRM). A FLOOD ELEVATION CERTIFICATE MAY BE NEEDED TO DETERMINE OR VERIFY THE LOCATION OF THE FLOOD AREAS...

MISCELLANEOUS NOTES

- N1 THE BASIS OF BEARINGS OF THIS SURVEY IS BASED ON THE CENTERLINE OF S. LA CIENEGA BOULEVARD PER TRACT NO. 7171 FILED IN MAP BOOK 77/19. N2 THE TABLE BELOW DESCRIBES THE TYPE AND NUMBER OF PARKING STALLS ENTIRELY WITHIN PROPERTY BOUNDARY...

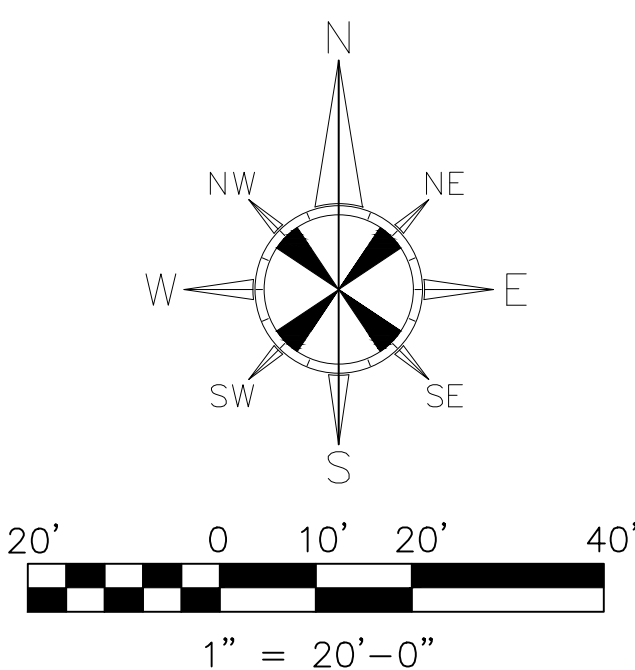
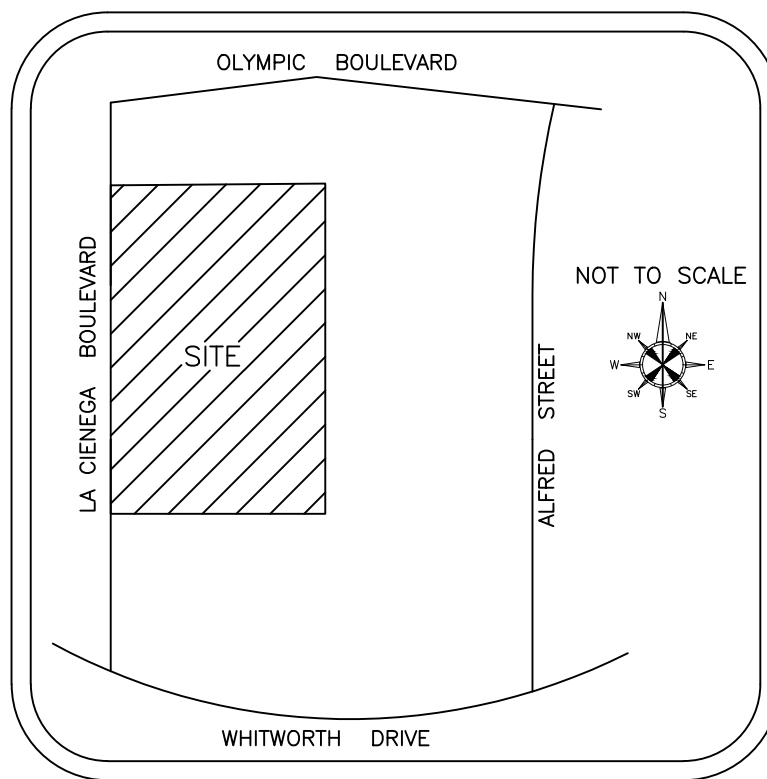
PARKING

Table with 5 columns: REGULAR, DISABLED, TRAILER, PARTIAL, TOTAL. Values: 0, 0, 0, 0, 0.

UTILITY NOTE

1 THE SURVEY SHOWS THE LOCATION OF UTILITIES EXISTING ON OR SERVING THE SURVEYED PROPERTY AS DETERMINED BY OBSERVED EVIDENCE COLLECTED PURSUANT TO ALTA SECTION 5 E IV WHILE THE LOCATION OF UNDERGROUND UTILITIES ARE ASSUMED TO BE ACCURATE...

VICINITY MAP



STATEMENT OF ENCROACHMENTS

- E1 FENCE ENCROACHES INTO RIGHT OF WAY BY 0.27' E2 FENCE ENCROACHES INTO RIGHT OF WAY BY 1.23' E3 FENCE ENCROACHES INTO RIGHT OF WAY BY 2.70' E4 FENCE ENCROACHES INTO RIGHT OF WAY BY 2.18'

SURVEY RELATED ITEMS CORRESPONDING TO SCHEDULE B TITLE COMMITMENT

- 9 EASEMENT FOR PUBLIC UTILITIES AND RIGHTS INCIDENTAL CONTAINED IN DOCUMENT RECORDED IN BOOK 3829, PAGE 378 OF OFFICIAL RECORDS - PLOTTED HEREON. 10 EASEMENT FOR PUBLIC UTILITIES AND RIGHTS INCIDENTAL CONTAINED IN DOCUMENT RECORDED IN BOOK 4621, PAGE 295 OF OFFICIAL RECORDS - PLOTTED HEREON.

TITLE LEGAL DESCRIPTION

THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:

PARCEL ONE: LOT 121 OF TRACT NO. 7170, IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 76, PAGE 12 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY. PARCEL TWO: LOT 122 OF TRACT NO. 7170, IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 76, PAGE 12 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

FOR CONVEYANCING PURPOSES ONLY: APN(S)

- 5087-001-023 (AFFECTS PARCEL ONE); 5087-001-024 (AFFECTS PARCEL TWO); 5087-001-040 (AFFECTS PARCEL THREE) AND 5087-001-041 (AFFECTS PARCEL FOUR).

The property described hereon is the same as the property described in the First American Title Insurance Company Order No.: NCS-1070906-CH2 with an effective date of June 15, 2021 and that all easements, covenants and restrictions referenced in said Title Commitment or apparent from a physical inspection of the site or otherwise known to me have been plotted hereon or otherwise noted as to their effect on the subject property.

ALTA/NSPS LAND TITLE SURVEY

FOR 1022-1054 S La Cienega

PARTNER PROJECT NUMBER 21-321356.1 SITE NUMBER []

ALTA SURVEY BASED AND RELIED ON FIRST AMERICAN TITLE INSURANCE COMPANY POLICY OF TITLE, NUMBER NCS-1070906-CH2, CONTAINING A DATE OF POLICY AND TIME OF JUNE 15, 2021, AT 7:30 A.M.

CERTIFICATION

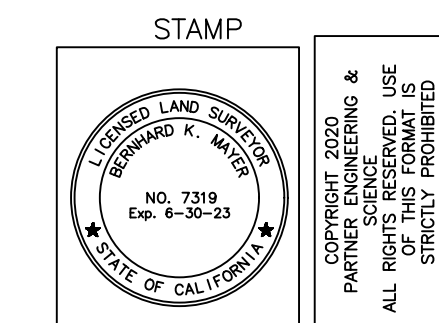
TO: Carmel Partners Realty VII, LLC, a Delaware limited liability company, its successors and assigns; First American Title Insurance Company, and each of their respective successors and assigns:

THIS IS TO CERTIFY THAT THIS MAP OR PLAT AND THE SURVEY ON WHICH IT IS BASED WERE MADE IN ACCORDANCE WITH THE 2021 MINIMUM STANDARD DETAIL REQUIREMENTS FOR ALTA/NSPS LAND TITLE SURVEYS, JOINTLY ESTABLISHED AND ADOPTED BY ALTA AND NSPS, AND INCLUDES ITEMS 2, 3, 4, 6a, 6b, 7a, 7b, 7c, 8, 9, 13, 14, 16 and 17 OF TABLE A THEREOF. THE FIELDWORK WAS COMPLETED ON MAY 24, 2021.

DATE OF PLAT OR MAP: JUNE 09, 2021

PROPERTY ADDRESS: 1022-1054 S LA CIENEGA, LOS ANGELES CA 90035

BERNHARD K. MAYER Registration No. P.L.S. 7319 In the State of California Field Date of Survey: 05/24/21 Revision Date: 06/11/21



CORPORATE OFFICE 2154 TORRANCE BLVD. TORRANCE, CA 90501 888-213-7479 ALTA@partneresi.com

http://www.partneresi.com/ PAGE 1 OF 2



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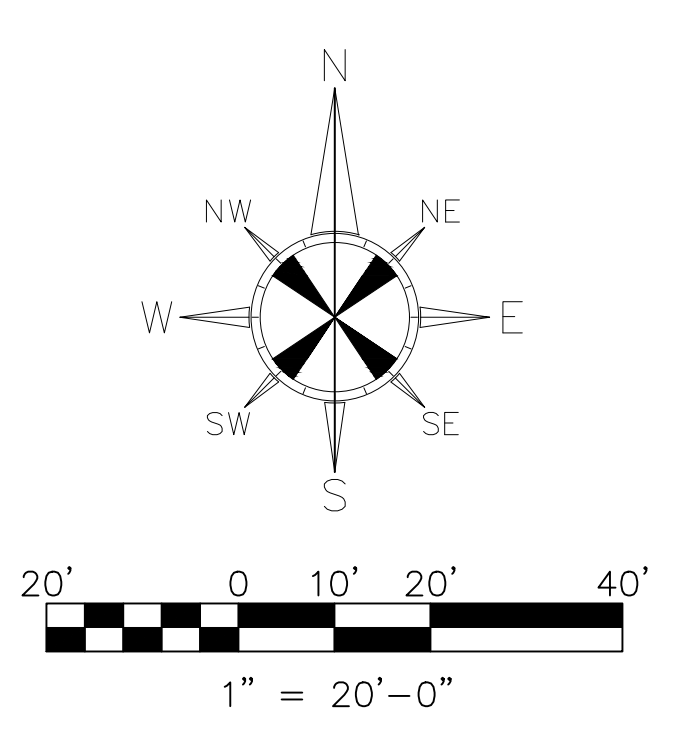
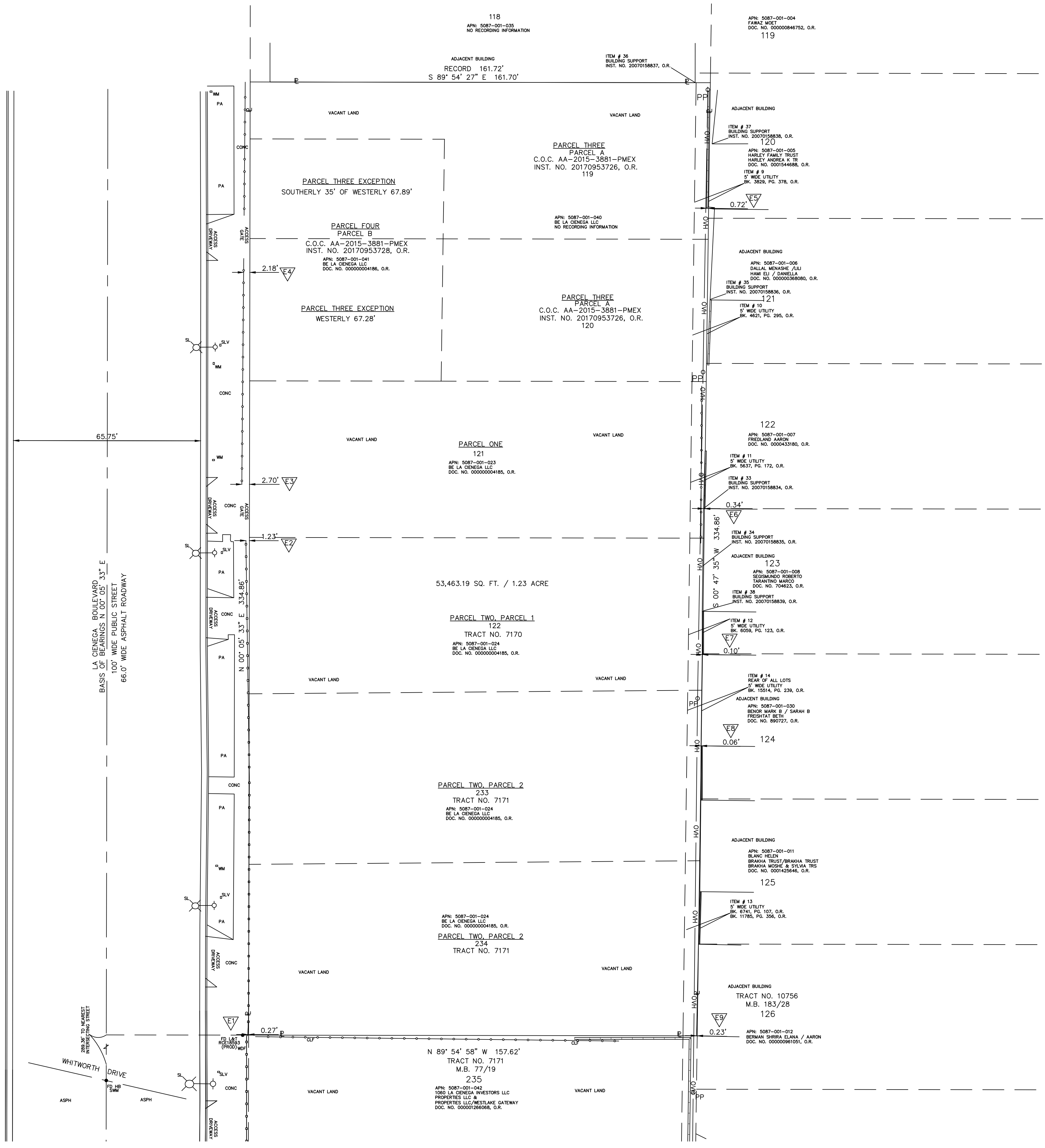
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NO. DATE DESCRIPTION

ALTA SURVEY (FOR REFERENCE ONLY)

Project Number: Sheet Number:

C0.01



LEGEND	
APN	ASSESSORS PARCEL NUMBER
ASPH	ASPHALT
B	BOLLARD
CR	CABLE TV RISER
CONC	CONCRETE
DOC.	DOCUMENT
DI	DRAIN INLET
D/W	DRIVEWAY
DCV	DETECTOR CHECK VALVE
EV	ELECTRIC VAULT
FS	FIRE SERVICE
FIN	FIRE LINE INLET
FDC	FIRE DEPARTMENT CONNECTION
FP	FLAG POLE
GM	GAS METER
GTM	GATE MOTOR
GW	GUY WIRE
H	HANDICAP SPACE
H	HEIGHT
LS	LIGHT STANDARD
NO.	NUMBER
O.R.	OFFICIAL RECORDS
PA	PLANTER AREA
PL	PROPERTY LINE
PP	POWER POLE
SN	SIGN
SP	SERVICE POLE
SL	STREET LIGHT
SMH	SEWER MANHOLE
SLV	STREET LIGHT VAULT
UC	UTILITY CABINET
W/	WITH
WM	WATER METER
WWT	WATER VAULT
WV	WATER VALVE
STUCCO OR BLOCK WALL - TYPICAL	
MF	METAL FENCE - TYPICAL
WIF	WROUGHT IRON FENCE - TYPICAL
CLF	CHAIN LINK FENCE - TYPICAL
OH	OVERHANG
OHU	OVERHEAD UTILITY LINE
PAINTED HATCH AREA	
PARKING SPACE COUNTER	
DECIDUOUS TREE	
PALM TREE	

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EXHIBIT A
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PAGE 13 OF 38

NO.	DATE	DESCRIPTION

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ALTA SURVEY
(FOR REFERENCE ONLY)

Project Number:

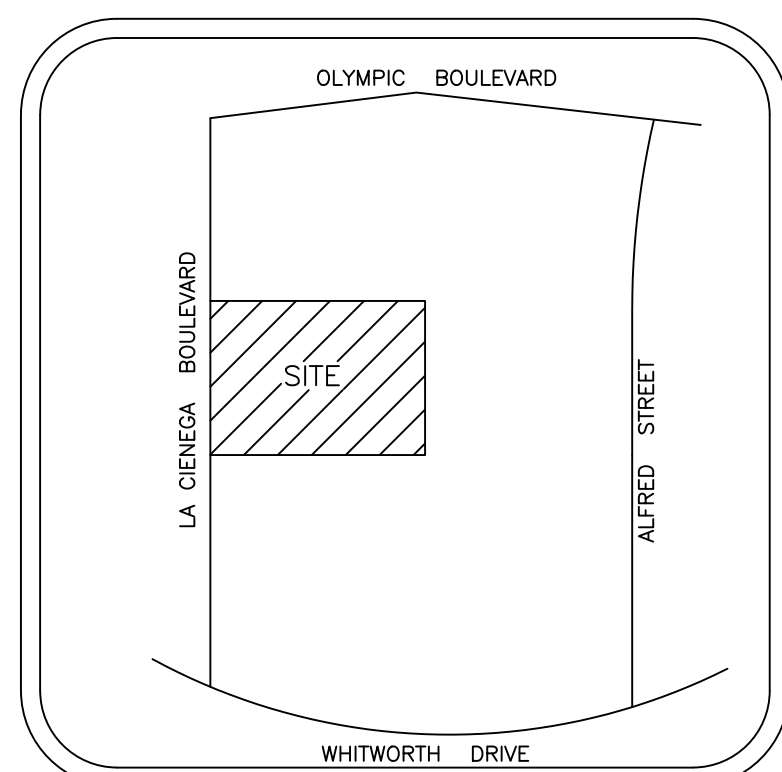
Sheet Number:

C0.02

ZONING INFORMATION

ZONING INFORMATION PROVIDED BY ARMBRUSTER GOLDSMITH DELVAC LLP
ZONING DESIGNATION: C2-1-O.
BASE DENSITY: ONE UNIT PER 400 SQUARE FEET OF LOT AREA, WHICH WOULD PERMIT A BASE DENSITY OF 200 DWELLING UNITS.

VICINITY MAP



FLOOD ZONE

A FIELD SURVEY WAS NOT CONDUCTED TO DETERMINE THE FLOOD ZONE AREAS. ANY FLOOD ZONE LINES DISTINGUISHING BETWEEN FLOOD AREAS ARE GRAPHICALLY PLOTTED FROM FEMA FLOOD INSURANCE RATE MAPS (FIRM).

MISCELLANEOUS NOTES

- N1 THE BASIS OF BEARINGS OF THIS SURVEY IS BASED ON THE CENTERLINE OF LA CIENEGA BOULEVARD PER TRACT NO. 10756.
N2 THE TABLE BELOW DESCRIBES THE TYPE AND NUMBER OF PARKING STALLS ENTIRELY WITHIN PROPERTY BOUNDARY.

PARKING

Table with 5 columns: REGULAR, DISABLED, TRAILER, PARTIAL, TOTAL. Row 1: 0, 0, 0, 0, 0.

- N3 NO EVIDENCE OF RECENT EARTH MOVING WORK, BUILDING CONSTRUCTION OR BUILDING ADDITIONS OBSERVED IN THE PROCESS OF CONDUCTING THE FIELDWORK.
N4 THERE ARE NO PROPOSED CHANGES IN STREET RIGHT OF WAY LINES, IF SUCH INFORMATION IS MADE AVAILABLE TO THE SURVEYOR BY THE CONTROLLING JURISDICTION.
N5 THE NEAREST INTERSECTING STREET, LA CIENEGA BOULEVARD AND WHITWORTH DRIVE ARE ABUTTING THE SUBJECT PROPERTY AND ARE DESIGNATED ON SURVEY MAP FOR CLARITY.

UTILITY NOTE

- 1 THE SURVEY SHOWS THE LOCATION OF UTILITIES EXISTING ON OR SERVING THE SURVEYED PROPERTY AS DETERMINED BY OBSERVED EVIDENCE COLLECTED PURSUANT TO ALTA SECTION 5 EIV

SURVEY RELATED ITEMS CORRESPONDING TO SCHEDULE B TITLE COMMITMENT

- ITEM #S 1 THROUGH 8 ARE NON SURVEY RELATED - DO AFFECT - NOT PLOTTED.
7 EASEMENT FOR POLE LINES, CONDUITS, SEWER PIPES AND INCIDENTAL PURPOSES CONTAINED IN DOCUMENT RECORDED IN BOOK 4605, PAGE 341 OF OFFICIAL RECORDS - DOES AFFECT - PLOTTED HEREON.
10 EASEMENT FOR PUBLIC UTILITIES AND INCIDENTAL PURPOSES CONTAINED IN DOCUMENT RECORDED IN BOOK 4710, PAGE 58 OF OFFICIAL RECORDS - DOES AFFECT - PLOTTED HEREON.

SURVEY RELATED ITEMS CORRESPONDING TO SCHEDULE B TITLE COMMITMENT

- 27 TERMS AND PROVISIONS CONTAINED IN DOCUMENT ENTITLED "COVENANT AND AGREEMENT REGARDING MAINTENANCE OF BUILDING SUPPORT" RECORDED AUGUST 15, 2018 AS INSTRUMENT NO. 20180821483 OF OFFICIAL RECORDS - DOES AFFECT - PLOTTED HEREON.
28 TERMS AND PROVISIONS CONTAINED IN DOCUMENT ENTITLED "COVENANT AND AGREEMENT REGARDING MAINTENANCE OF BUILDING SUPPORT" RECORDED AUGUST 15, 2018 AS INSTRUMENT NO. 20180821484 OF OFFICIAL RECORDS - DOES AFFECT - PLOTTED HEREON.
ITEM # 29 HAS BEEN INTENTIONALLY DELETED.

TITLE LEGAL DESCRIPTION

THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:
PARCEL 1: LOTS 235 AND 236 OF TRACT 7171, IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 77, PAGE 19 OF OFFICIAL RECORDS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

ALTA/NSPS LAND TITLE SURVEY FOR

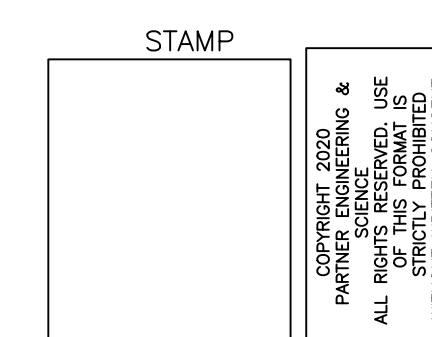
1056-1066 S. La Cienega Boulevard
PARTNER PROJECT NUMBER 21-315880.2 SITE NUMBER []
ALTA SURVEY BASED AND RELIED ON FIRST AMERICAN TITLE INSURANCE COMPANY POLICY OF TITLE, NUMBER NCS-1068267-CH12, CONTAINING A DATE OF POLICY AND TIME OF MAY 04, 2021 at 7:30 AM

CERTIFICATION

TO: Carmel Partners Realty VII, LLC, a Delaware limited liability company, its successors and assigns; First American Title Insurance Company.
THIS IS TO CERTIFY THAT THIS MAP OR PLAT AND THE SURVEY ON WHICH IT IS BASED WERE MADE IN ACCORDANCE WITH THE 2021 MINIMUM STANDARD DETAIL REQUIREMENTS FOR ALTA/NSPS LAND TITLE SURVEYS, JOINTLY ESTABLISHED AND ADOPTED BY ALTA AND NSPS, AND INCLUDES ITEMS 2, 3, 4, 6a, 6b, 7a, 7b1, 7c, 8, 9, 13, 14, 16 and 17 OF TABLE A THEREOF. THE FIELDWORK WAS COMPLETED ON APRIL 26, 2021.

DATE OF PLAT OR MAP: MAY 04, 2021
PROPERTY ADDRESS: 1056-1066 S. La Cienega Boulevard, Los Angeles, CA 90035

BERNHARD K. MAYER
Registration No. P.L.S. 7319
In the State of California
Field Date of Survey: April 26, 2021
Revision Date: June 14, 2021
Revision Date: June 17, 2021
Latest Revision Date: August 12, 2021



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STATEMENT OF ENCROACHMENTS

- E1 FENCE ENCROACHES INTO RIGHT OF WAY BY 0.7'
E2 FENCE ENCROACHES INTO RIGHT OF WAY BY 0.6'

SCHEDULE B-II NOTES CONTINUED IN COLUMN TO RIGHT:



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Table with 3 columns: NO., DATE, DESCRIPTION

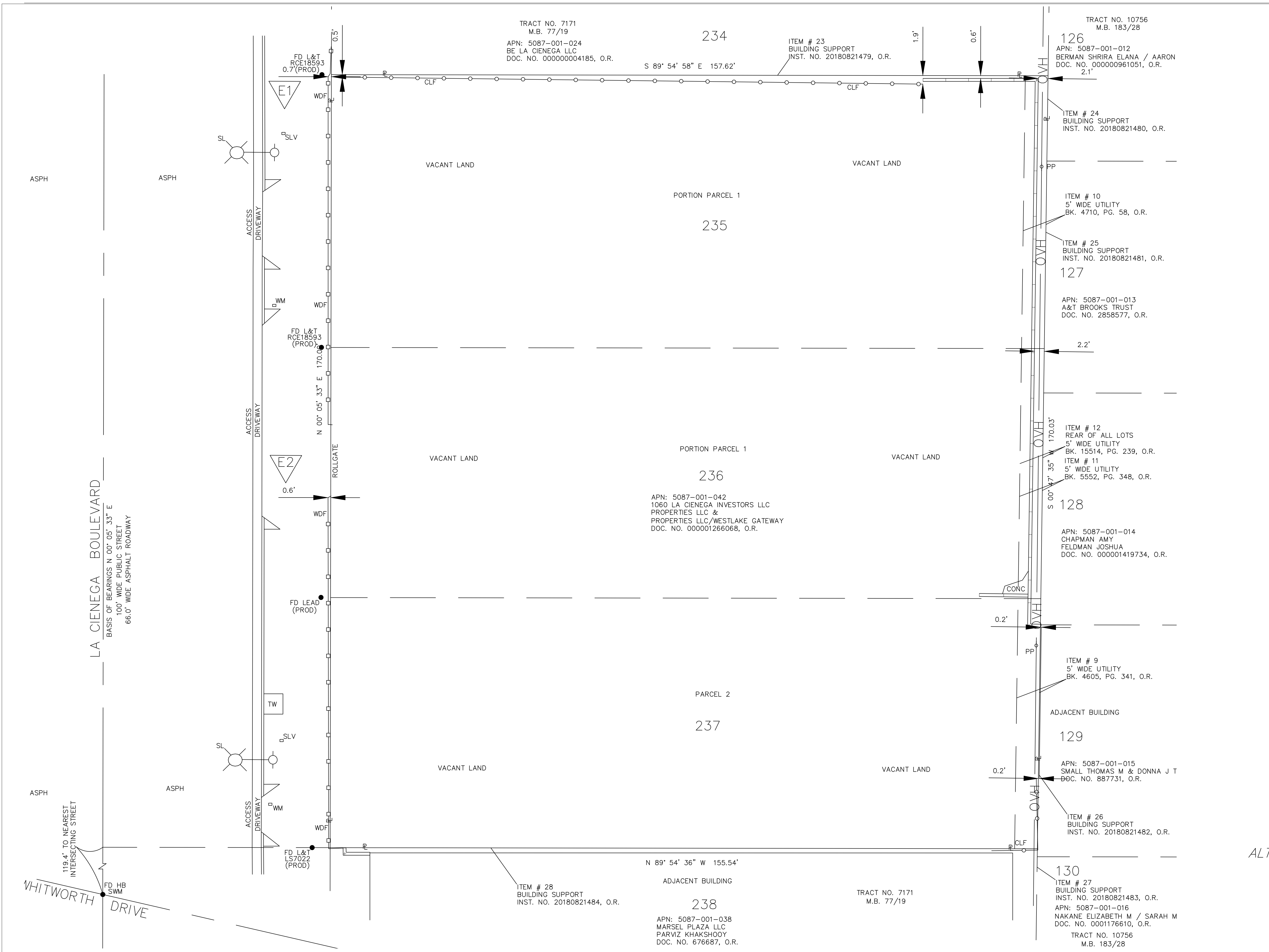
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ALTA SURVEY (FOR REFERENCE ONLY)

Project Number:
Sheet Number: C0.03



LEGEND

- APN ASSESSOR'S PARCEL NUMBER
- ASPH ASPHALT
- BK BOOK
- CLF CHAIN LINK FENCE
- DOC DOCUMENT
- FD FOUND MONUMENT - AS NOTED
- HB HEX BOLT
- INST INSTRUMENT
- L&T LEAD AND TAG
- M.B. MAP BOOK
- NO. NUMBER
- O.R. OFFICIAL RECORDS
- PG. PAGE
- PL PROPERTY LINE
- PP POWER POLE
- PROD PRODUCED
- SL STREET LIGHT
- SLV STREET LIGHT VAULT
- SMM STANDARD WELL MONUMENT
- TW TREE WELL
- WDF WOOD FENCE
- WM WATER METER
- WALL BLOCK - TYPICAL
- - - EASEMENT LINES
- OVH- OVERHEAD UTILITY LINE

North arrow pointing up with cardinal directions (N, S, E, W) and intercardinal directions (NE, SE, SW, NW).
 Graphic scale bar showing 0, 5, 10, and 20 feet.
 1" = 10'

ALTA/NSPS LAND TITLE SURVEY

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ALTA SURVEY
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Project Number:

Sheet Number:

C0.04

LEGAL DESCRIPTION

[AS SHOWN ON ALTA SURVEY PREPARED BY PARTNER ENGINEERING AND SCIENCE, INC., JOB NUMBER 21-321356.1 DATED JUNE 9, 2021]

THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:

(PARCEL ONE)
 LOT 121 OF TRACT NO. 7170, IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 76, PAGE 12 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

(PARCEL TWO)
 PARCEL 1:
 LOT 122 OF TRACT NO. 7170, IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 76, PAGE 12 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

(PARCEL TWO)
 PARCEL 2:
 LOTS 233 AND 234 OF TRACT NO. 7171, IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 77, PAGE 19 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

(PARCEL THREE)
 PARCEL A AS SHOWN ON CERTIFICATE OF COMPLIANCE FOR LOT LINE ADJUSTMENT PARCEL MAP EXEMPTION NO. AA-2015-3881-PMEX, AS EVIDENCED BY DOCUMENT RECORDED AUGUST 23, 2017 AS INSTRUMENT NO. 20170953726 OF OFFICIAL RECORDS, BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

(PARCEL FOUR)
 PARCEL B AS SHOWN ON CERTIFICATE OF COMPLIANCE FOR LOT LINE ADJUSTMENT PARCEL MAP EXEMPTION NO. AA-2015-3881-PMEX, AS EVIDENCED BY DOCUMENT RECORDED AUGUST 23, 2017 AS INSTRUMENT NO. 20170953728 OF OFFICIAL RECORDS, BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

ALSO
 [AS SHOWN ON LAST SURVEY PREPARED BY PARTNER ENGINEERING AND SCIENCE, INC., JOB NUMBER 21-315880.2]

(PARCEL FIVE)
 LOTS 235 AND 236 OF TRACT 7171, IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 77, PAGE 19 OF OFFICIAL RECORDS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

(PARCEL SIX)
 LOT 237 OF TRACT 7171, IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 77, PAGE 19 OF OFFICIAL RECORDS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

COMMENTS

HORIZONTAL DATUM/ BASIS OF BEARINGS HORIZONTAL DATUM FOR THIS SURVEY IS ASSUMED. THE CENTERLINE OF LA CIENEGA BOULEVARD WAS HELD BETWEEN A FOUND CASED HUB & TACK MONUMENT AT THE INTERSECTION WITH WHITWORTH DRIVE AND THE LEAD & TACK STAMPED "LACS" FOUND AT THE INTERSECTION WITH WEST OLYMPIC BOULEVARD, TAKEN AS NORTH 00°05'33" EAST PER TRACT NO. 7170, IN MAP BOOK 76-12.

VERTICAL DATUM/ BASIS OF ELEVATIONS VERTICAL DATUM FOR THIS SURVEY IS NAVD88 PER NAVIGATE LA BENCHMARK NO. 13-04831 AT THE INTERSECTION OF WEST OLYMPIC BOULEVARD AND LA CIENEGA BOULEVARD WAS HELD FOR ELEVATION, BEING 127.69' (YEAR OF ADJUSTMENT = 2000)

LOT AREA 80,084 +/- S.F. (1.838AC +/-) PER REFERENCE SURVEY #3.

SITE ADDRESS 1022-1066 LA CIENEGA BLVD, LOS ANGELES, CA

ASSESSOR PARCEL NUMBER (APN) 5087-001-023 (AFFECTS PARCEL ONE);
 5087-001-024 (AFFECTS PARCEL TWO);
 5087-001-040 (AFFECTS PARCEL THREE) AND
 5087-001-041 (AFFECTS PARCEL FOUR);
 5087-001-042 (AFFECTS PARCELS FIVE AND SIX)

REFERENCE SURVEYS 1. ALTA SURVEY PREPARED BY PARTNER ENGINEERING AND SCIENCE, INC., JOB NUMBER 21-321356.1 DATED JUNE 9, 2021
 2. TRACT MAP 7170, BOOK 76, PAGE 12
 3. TRACT MAP 7171, BOOK 77, PAGE 19
 4. LOT LINE ADJUSTMENT PARCEL MAP EXEMPTION AA-2015-3881-PMEX INST. NO. 20170953726

DATE OF SURVEY THIS SURVEY REPRESENTS VISIBLE PHYSICAL IMPROVEMENT CONDITIONS EXISTING ON XXXXXX. ALL SURVEY CONTROL INDICATED AS "FOUND" WAS RECOVERED FOR THIS PROJECT IN 25 AUGUST OF 2021.

TITLE INSURANCE THIS SURVEY WAS PERFORMED WITHOUT THE BENEFIT OF A CURRENT TITLE REPORT AND DOESNT PURPORT TO SHOW ANY EASEMENTS OF RECORD.

THIS SURVEY (MAP) CONTAINS INFORMATION THAT IS PROPRIETARY TO DAVID EVANS AND ASSOCIATES, INC. ITS USE OR DISCLOSURE IN WHOLE OR IN PART WITHOUT THE EXPRESS WRITTEN PERMISSION OF DAVID EVANS AND ASSOCIATES, INC. IS PROHIBITED.

THIS SURVEY (MAP) IS ALSO AN UNPUBLISHED WORK PROTECTED UNDER THE COPYRIGHT LAWS OF THE UNITED STATES OF AMERICA. IF THIS WORK BECOMES PUBLISHED, THE FOLLOWING NOTICE SHALL APPLY:

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ABBREVIATION	DENOTES
AC	ASPHALT
BW	BACK OF WALK
BLDG.	BUILDING
C.O.	CLEAN OUT
CLF	CHAIN LINK FENCE
U/O	UNIDENTIFIED OBJECT
EOC	EDGE OF CONCRETE
ICV	IRRIGATION CONTROL VALVE
TC	TOP OF CURB
TW	TOP OF WALL
SLPB	STREET LIGHT PULL BOX
SL	STREET LIGHT
SSMH	SEWER MANHOLE
LIP	EDGE OF GUTTER
E	EAST
W	WEST
N	NORTH
S	SOUTH
PP	POWER POLE
PL	PROPERTY LINE
E/O	EAST OF
W/O	WEST OF
N/O	NORTH OF
S/O	SOUTH OF
WIF	WROUGHT IRON FENCE
L/S	LANDSCAPE AREA

SYMBOL	DENOTES
●	STORM DRAIN MANHOLE
●	SEWER MANHOLE
WM	WATER METER
●	LIGHT POLE WITH ARM
●	POWER POLE
x	CHAIN FENCE LINK
■	TRAFFIC SIGNAL JUNCTION BOX
—	FLOW LINE
⊞	SIGN
■	POWER JUNCTION/PULL BOX
●	WELL
○	TREE
■	POWER STREET LIGHT JUNCTION BOX
⊞	CENTERLINE

SURVEYOR'S NOTES

THIS IS NOT A BOUNDARY SURVEY. THE BOUNDARY SHOWN HEREON IS PER ALTA SURVEY PREPARED BY PARTNER ENGINEERING AND SCIENCE, INC., JOB NUMBER 21-321356.1 DATED JUNE 9, 2021.

ALL DISTANCES SHOWN HEREON ARE GROUND MEASUREMENTS IN U.S. SURVEY FEET.

UNDERGROUND UTILITIES SHOWN HEREON IF ANY ARE BASED UPON ABOVE GROUND OBSERVATIONS ONLY. AN UNDERGROUND UTILITY LOCATE BY 811 OR SIMILAR SERVICE WAS NOT PERFORMED

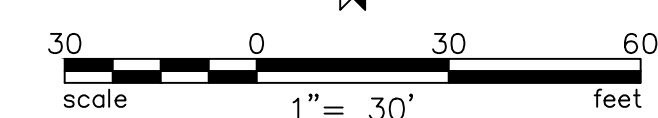
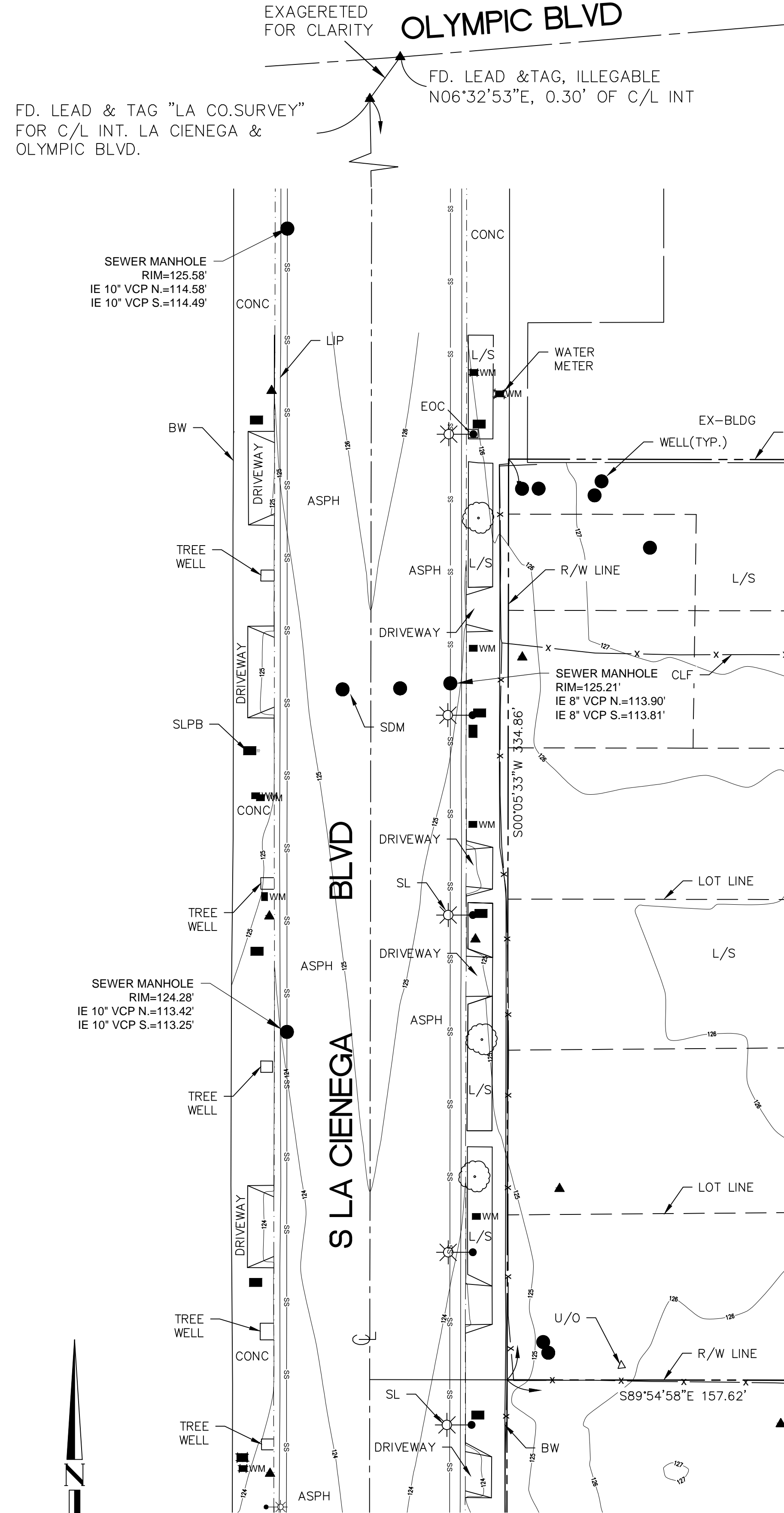
THIS IS A FIELD TRAVERSE SURVEY. TRIMBLE S6 AND TRIMBLE TSC7 DATA COLLECTOR WAS USED TO MEASURE THE ANGULAR AND DISTANCE RELATIONSHIPS BETWEEN THE CONTROLLING MONUMENTATION AS SHOWN. ALL INSTRUMENTS AND EQUIPMENT HAVE BEEN MAINTAINED IN ADJUSTMENT ACCORDING TO MANUFACTURERS' SPECIFICATIONS AND USED BY APPROPRIATELY TRAINED PERSONNEL.

SURVEYOR'S STAMMENT

THIS MAP CORRECTLY REPRESENTS A SURVEY MADE BY ME OR UNDER MY DIRECTION IN CONFORMANCE WITH THE REQUIREMENTS OF THE PROFESSIONAL LAND SURVEYORS' ACT.



ROBERT D. VASQUEZ, PLS 7300 DATE



SEE SHEET 2



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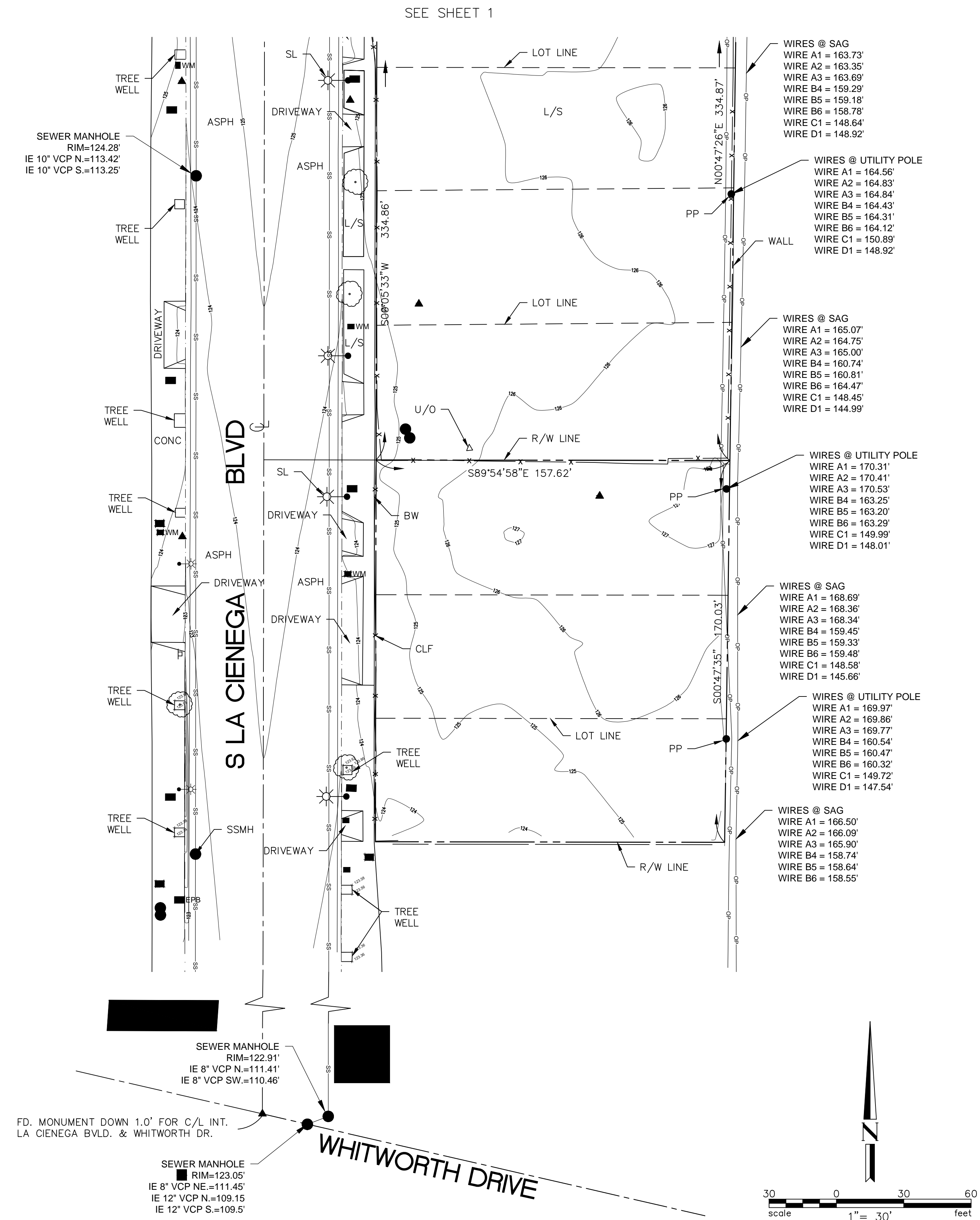
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TOPOGRAPHIC SURVEY

Project Number:
 Sheet Number: **C1.01**

LEGEND	
ABBREVIATION	DENOTES
AC	ASPHALT
BW	BACK OF WALK
BLDG.	BUILDING
C.O.	CLEAN OUT
CLF	CHAIN LINK FENCE
U/O	UNIDENTIFIED OBJECT
EOC	EDGE OF CONCRETE
ICV	IRRIGATION CONTROL VALVE
TC	TOP OF CURB
TW	TOP OF WALL
SLPB	STREET LIGHT PULL BOX
SL	STREET LIGHT
SSMH	SEWER MANHOLE
LIP	EDGE OF GUTTER
E	EAST
W	WEST
N	NORTH
S	SOUTH
PP	POWER POLE
PL	PROPERTY LINE
E/O	EAST OF
W/O	WEST OF
N/O	NORTH OF
S/O	SOUTH OF
WIF	WROUGHT IRON FENCE
L/S	LANDSCAPE AREA

LEGEND	
SYMBOL	DENOTES
●	STORM DRAIN MANHOLE
●	SEWER MANHOLE
WM	WATER METER
●	LIGHT POLE WITH ARM
●	POWER POLE
—x—	CHAIN FENCE LINK
■	TRAFFIC SIGNAL JUNCTION BOX
—	FLOW LINE
□	SIGN
■	POWER JUNCTION/PULL BOX
●	WELL
○	TREE
■	POWER STREET LIGHT JUNCTION BOX
⊂	CENTERLINE



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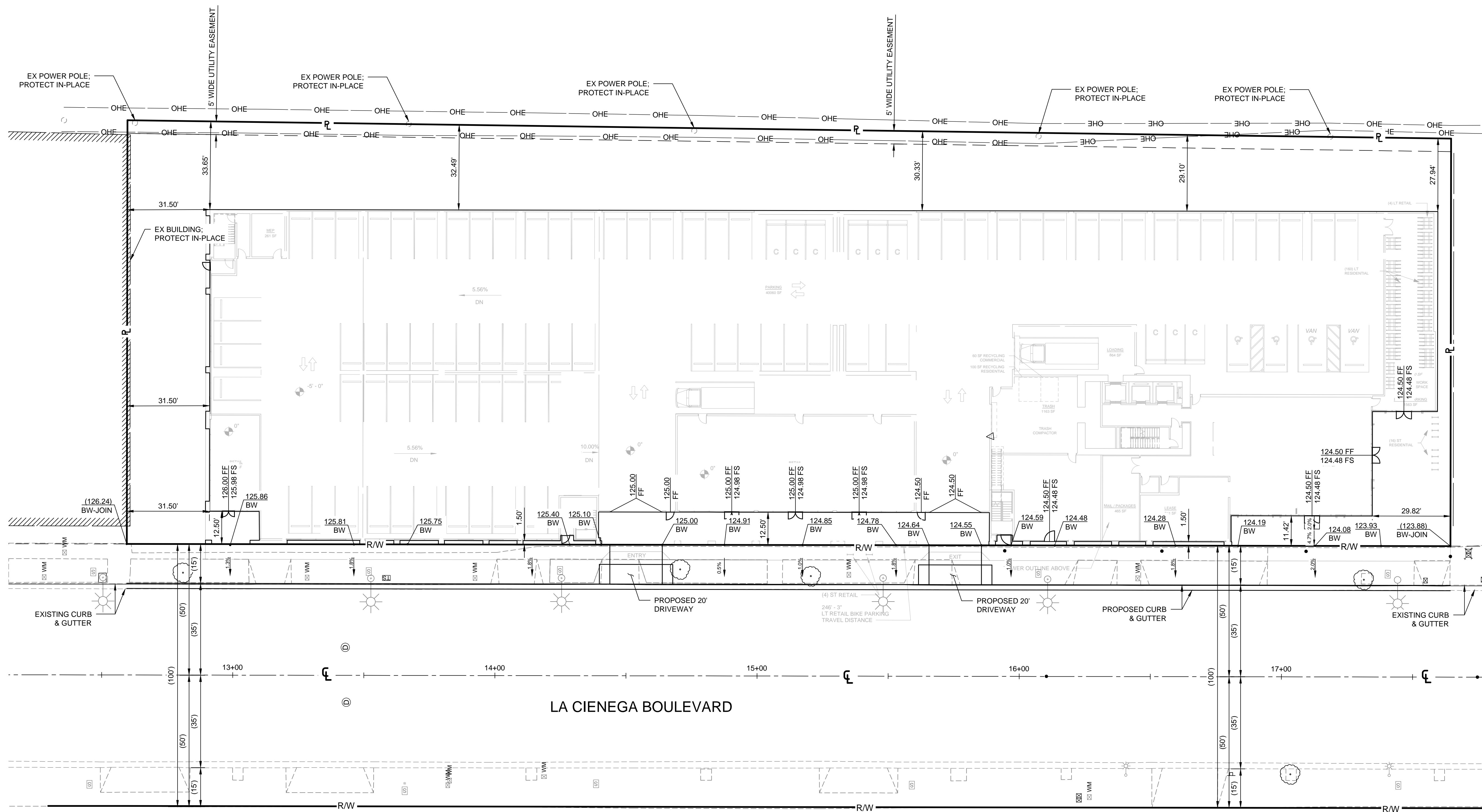
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**TOPOGRAPHIC
SURVEY**

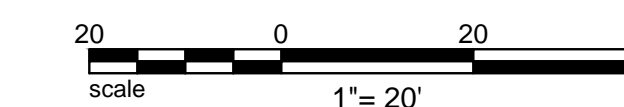
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Sheet
Number: **C1.02**



LEGEND

- ⊕ CENTER LINE
- ⊔ PROPERTY LINE
- R/W RIGHT OF WAY
- BW BACK OF WALK



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**BACK OF WALK
EXHIBIT**

Project
Number:

Sheet
Number:

C2.01

GENERAL NOTES

- EARTHWORK PERFORMED SHALL CONFORM TO REQUIREMENTS INDICATED IN THE GEOTECHNICAL INVESTIGATION REPORT.
- FINISHED FLOOR (FF) ELEVATION USED FOR EARTHWORK CALCULATIONS ARE AS FOLLOWS:
B1 LEVEL: VARIES 105.00'-115.00'
1ST LEVEL: 125.00'
- THE EARTHWORK QUANTITIES DO NOT TAKE INTO ACCOUNT THE EXCAVATION OF THE FOOTINGS, SHRINKAGE, COMPACTION, OR BULKING OF SOIL.
- A 6" THICK PROPOSED SLAB AND 2" SAND WAS USED IN EARTHWORK CALCULATIONS FOR THE BUILDING. CONTRACTOR SHALL VERIFY SLAB THICKNESS, SUB-BASE MATERIAL, AND WATERPROOFING PRIOR TO ESTABLISHING PAD ELEVATIONS.
- SHORING SHOWN HEREON IS FOR REFERENCE ONLY. SEE SHORING PLANS BY OTHERS.

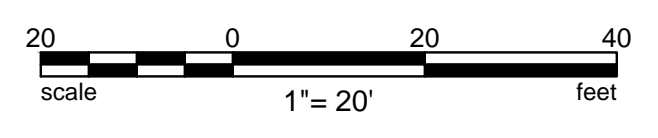
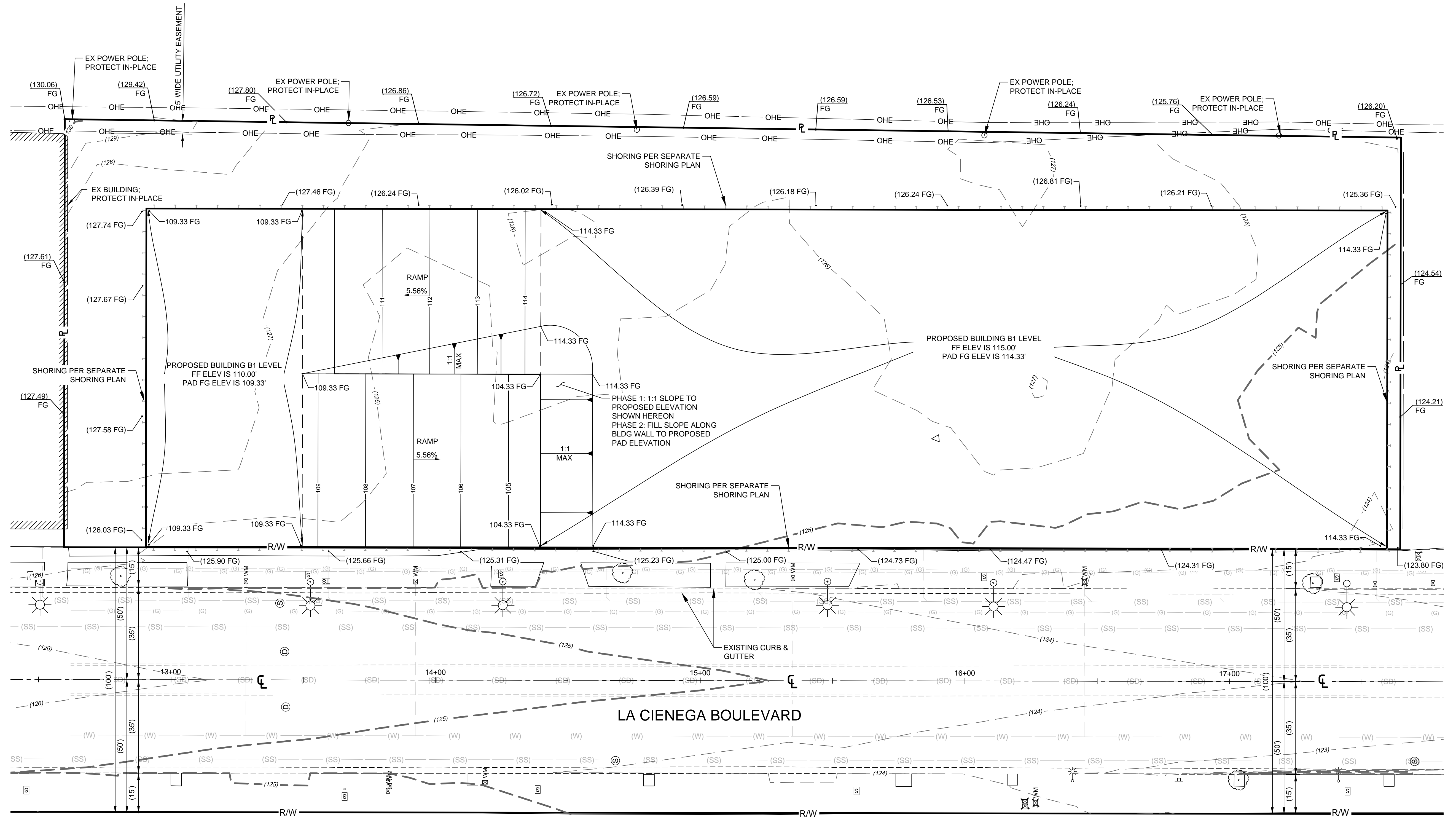
EARTHWORK CALCULATIONS

RAW QUANTITIES:
CUT = 33,680 CY
FILL = 0 CY

TOTAL EXPORT = 33,680 CY

LEGEND

- (W) — EXISTING WATER
- (SS) — EXISTING SEWER
- (SD) — EXISTING STORM DRAIN
- (G) — EXISTING GAS
- OHE — EXISTING OVERHEAD ELECTRICAL
- ℄ — CENTER LINE
- ℄ — PROPERTY LINE
- R/W — RIGHT OF WAY
- BW — BACK OF WALK
- CY — CUBIC YARDS
- EX — EXISTING
- FF — FINISHED FLOOR
- FG — FINISHED GRADE
- FS — FINISHED SURFACE
- (XXX.XX) — EXISTING ELEVATION
- XXX.XX — PROPOSED ELEVATION
- 1H:1V — 1' HORIZONTAL TO 1' VERTICAL
- — PROPOSED EXCAVATED SLOPE
- I I I — SHORING (FOR REFERENCE ONLY)



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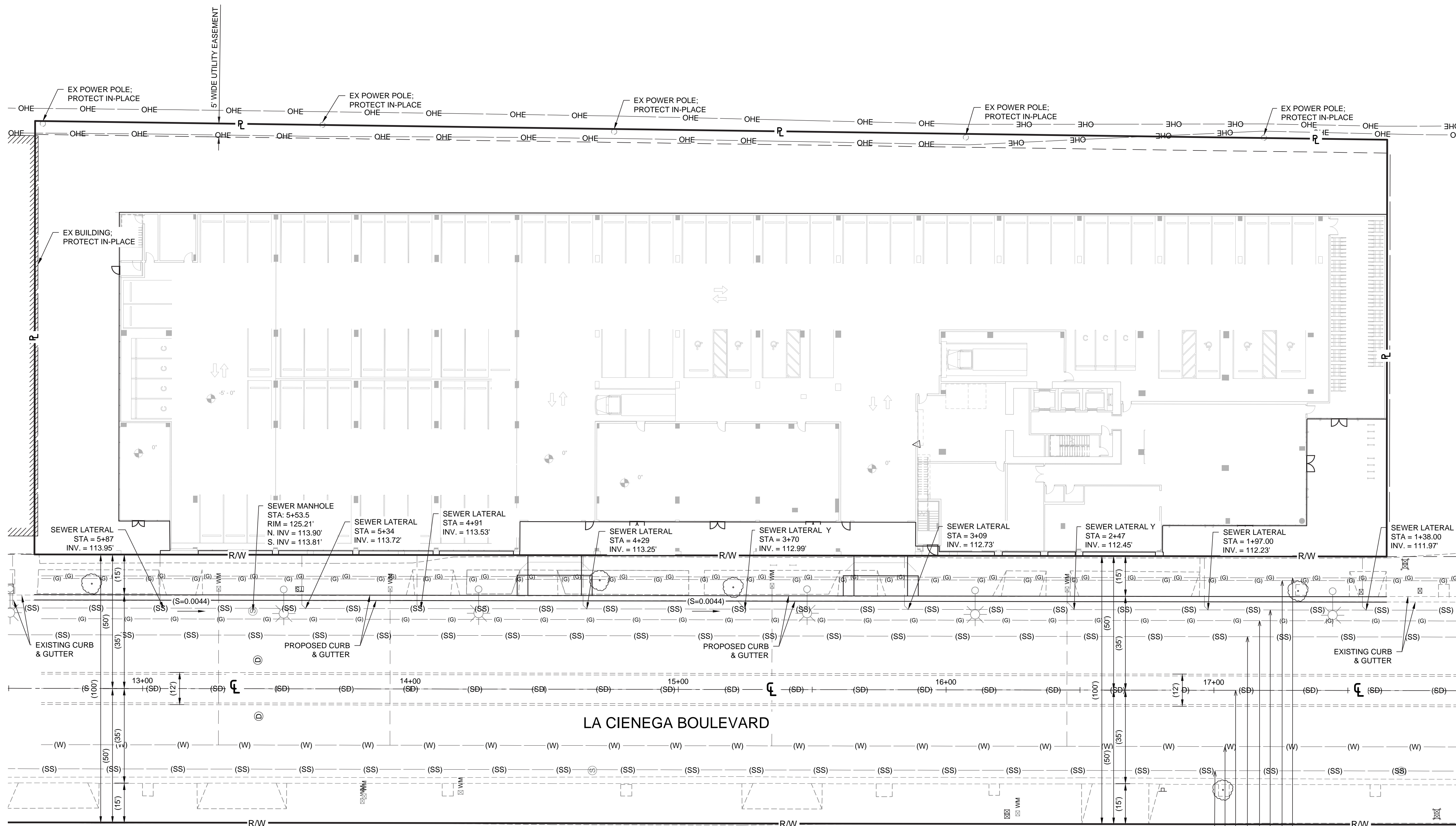
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EXCAVATION PLAN

Project Number:

Sheet Number:

C3.01



SEWER MANHOLE STA=5+33.5 RIM = 125.21' N. INV = 113.90' S. INV = 113.81'

SEWER LATERAL STA = 5+34 INV. = 113.72'

SEWER LATERAL STA = 4+91 INV. = 113.53'

SEWER LATERAL STA = 4+29 INV. = 113.25'

SEWER LATERAL Y STA = 3+70 INV. = 112.99'

SEWER LATERAL STA = 3+09 INV. = 112.73'

SEWER LATERAL Y STA = 2+47 INV. = 112.45'

SEWER LATERAL STA = 1+97.00 INV. = 112.23'

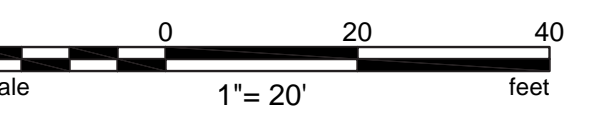
SEWER LATERAL STA = 1+38.00 INV. = 111.97'

SEWER MANHOLE STA = 0+10.00 RIM = 122.91' N. INV = 111.41' SW. INV = 110.46'

SEWER MANHOLE STA = 0+00.00 RIM = 123.05' NE. INV = 111.45' N. INV = 109.15' S. INV = 109.05'

LEGEND

- (W) — EXISTING WATER
- (SS) — EXISTING SEWER
- (SD) — EXISTING STORM DRAIN
- (G) — EXISTING GAS
- ⊕ CENTER LINE
- ℙ PROPERTY LINE
- R/W RIGHT OF WAY



10" SEWER 30' W/O Ⓢ
 6" WATER 21' W/O Ⓢ
 9" X 12" STORM DRAIN REINFORCED CONDUIT @ Ⓢ
 42" SANITARY SEWER 20' E/O Ⓢ
 3" SCG (ABAND.) 28' E/O Ⓢ
 8" SEWER 30' E/O Ⓢ
 3" SCG (ABAND.) 41' E/O Ⓢ
 2" SCG P.E.M. 42' E/O Ⓢ



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PAGE 20 OF 38

NO.	DATE	DESCRIPTION

1050 LA CIENEGA

1066 LA CIENEGA BLVD
LOS ANGELES, CA 90035

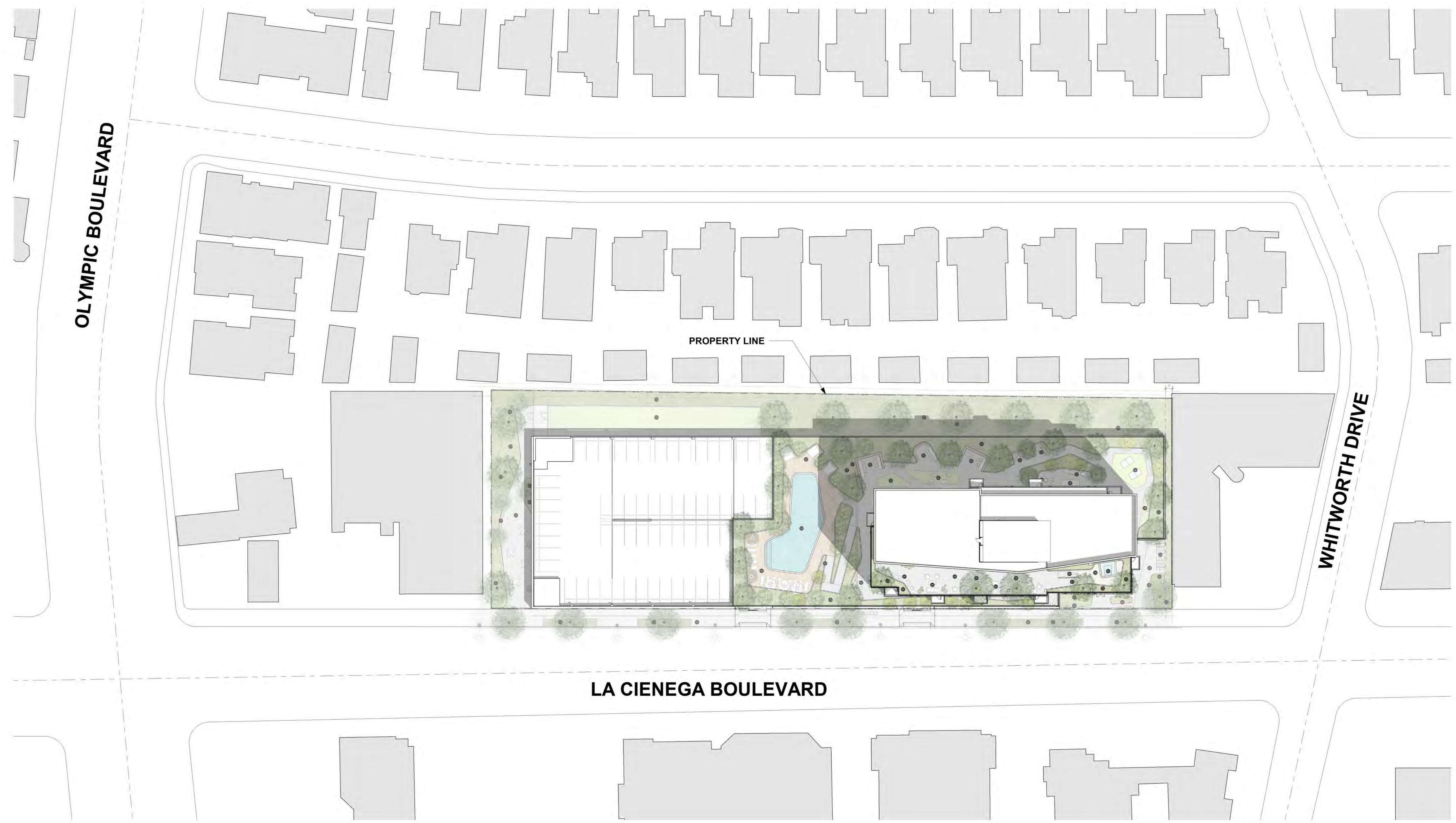
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**CONCEPTUAL
UTILITY PLAN**

Project
Number:

Sheet
Number:

C4.01



1 SITE PLAN
 SCALE: 1" = 40'-0"
 0 20 40 80
 1" = 40'-0" NORTH



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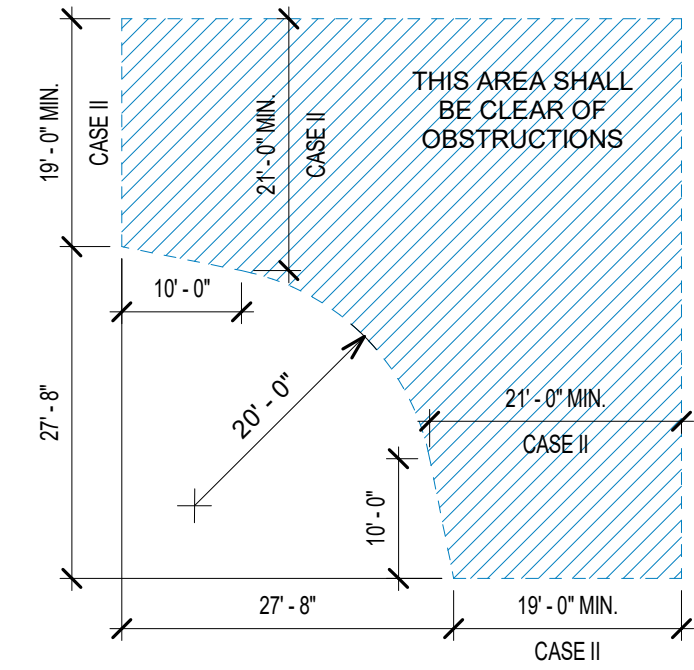
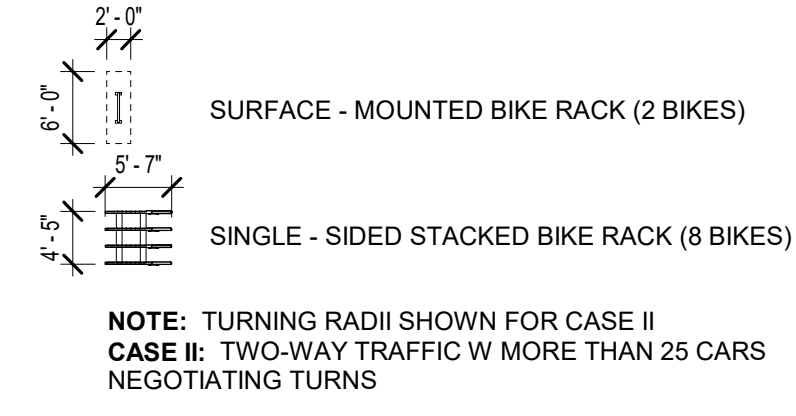
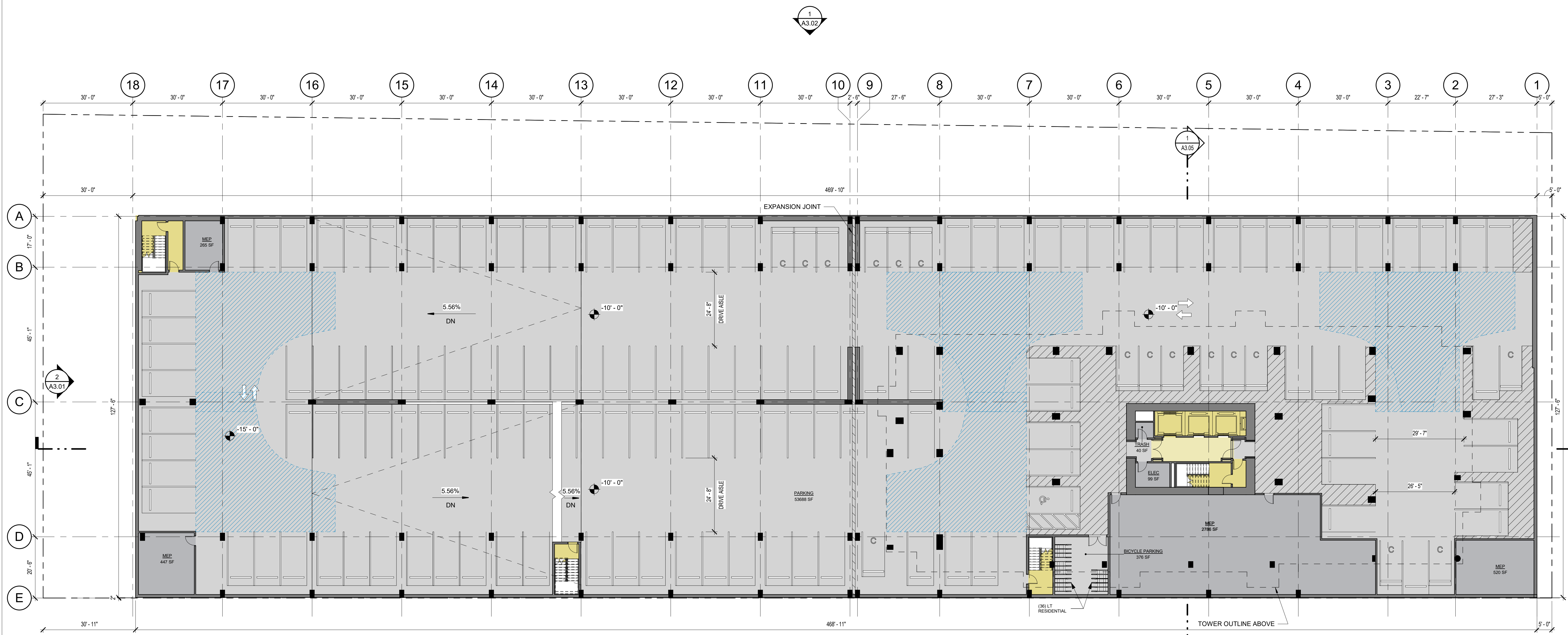
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SITE PLAN

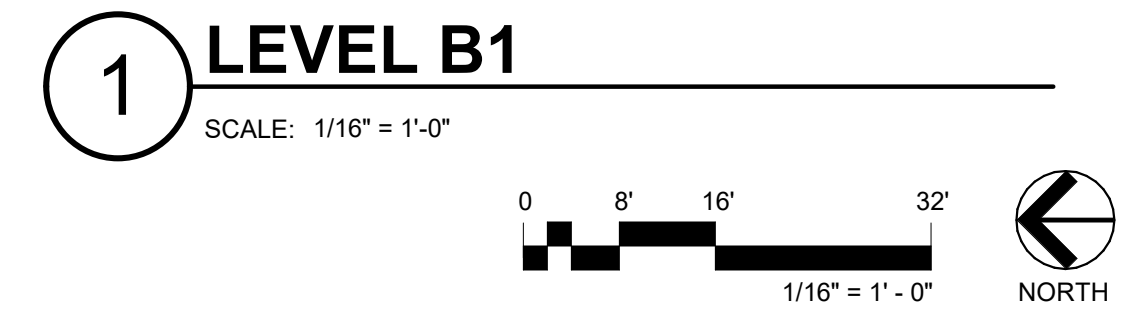
Project Number: 2021034

Sheet Number: **A1.01**



PARKING LEGEND

	RETAIL	RESIDENTIAL	ACCESSIBLE	TOTAL
LEVEL 03		59		59
LEVEL 02		110	4	114
LEVEL 01	28	60	4	92
LEVEL B1		146	1	147
				412



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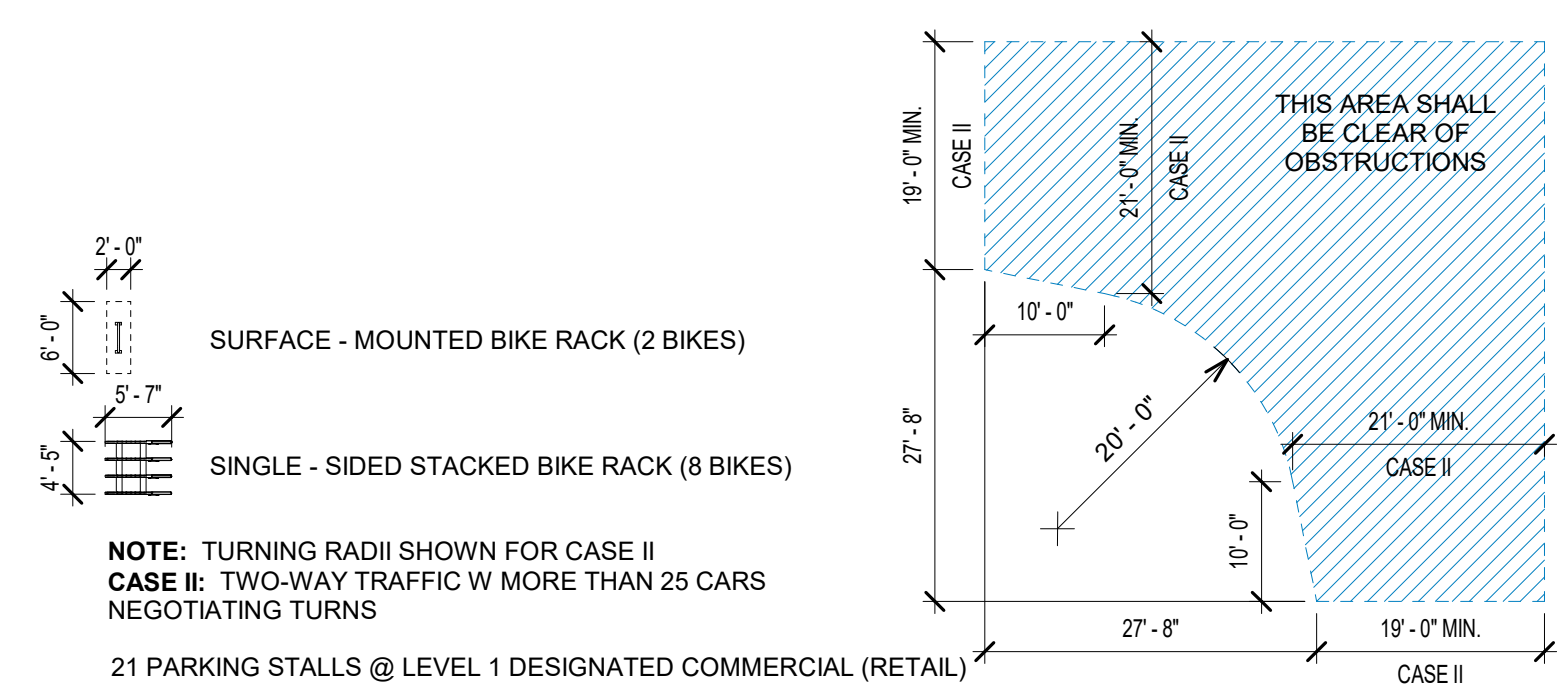
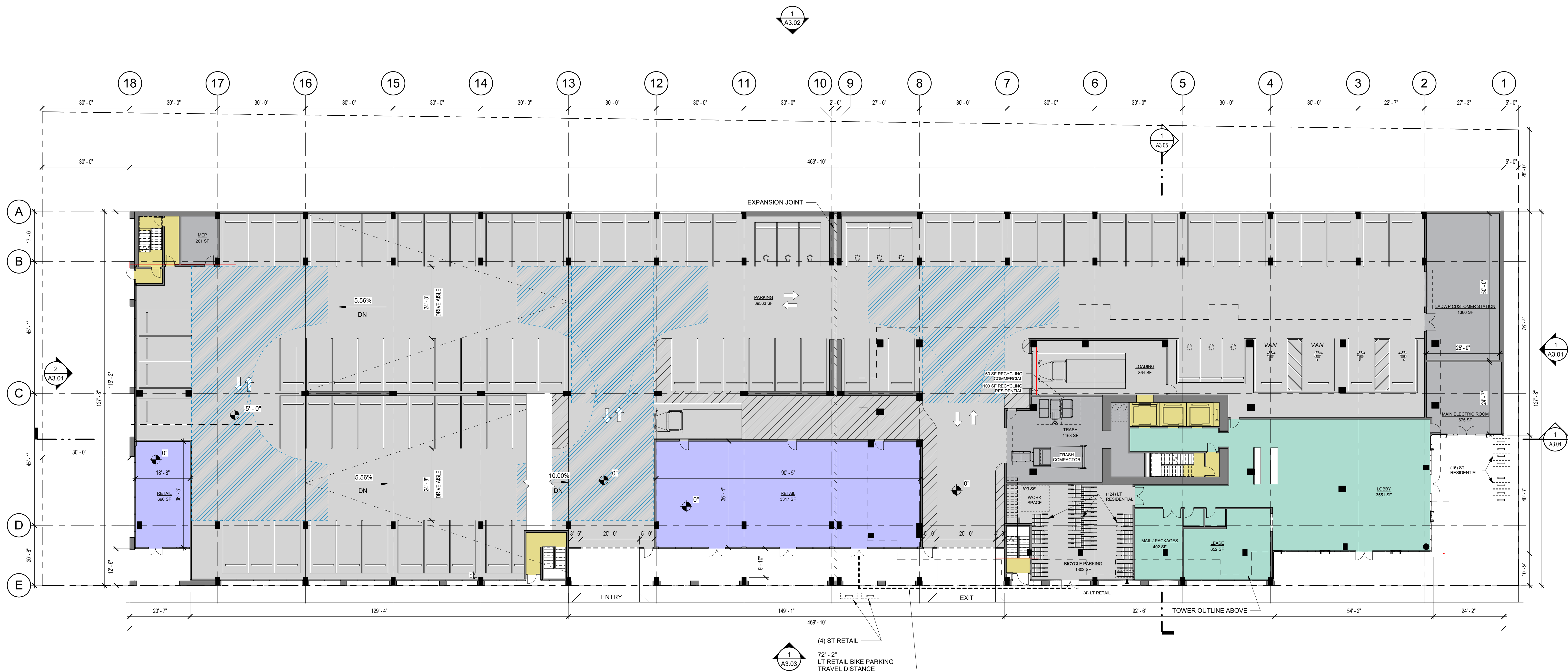
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LEVEL B1 FLOOR PLAN

Project Number: 2021034

Sheet Number: **A2.00**



PARKING LEGEND

	RETAIL	RESIDENTIAL	ACCESSIBLE	TOTAL
LEVEL 03		59		59
LEVEL 02		110	4	114
LEVEL 01	28	60	4	92
LEVEL B1		146	1	147
				412

1 LEVEL 01 FLOOR PLAN
 SCALE: 1/16" = 1'-0"
 0 8' 16' 32'
 1/16" = 1'-0" NORTH



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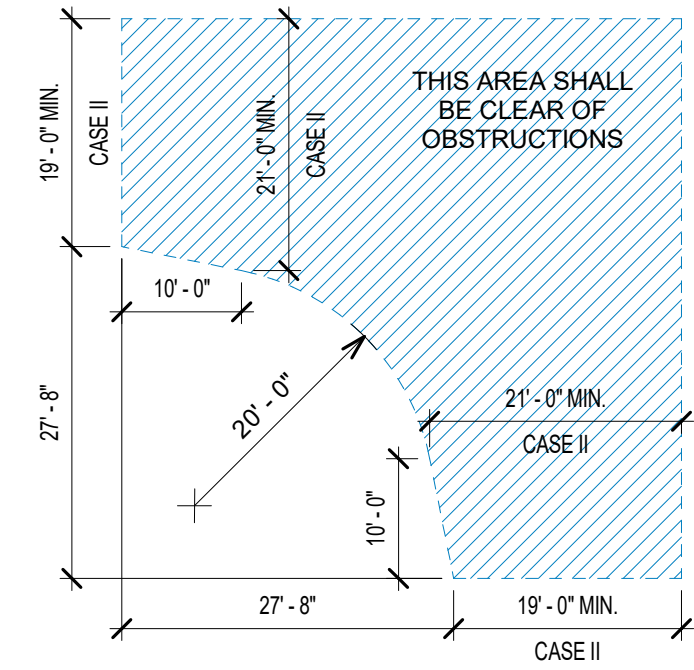
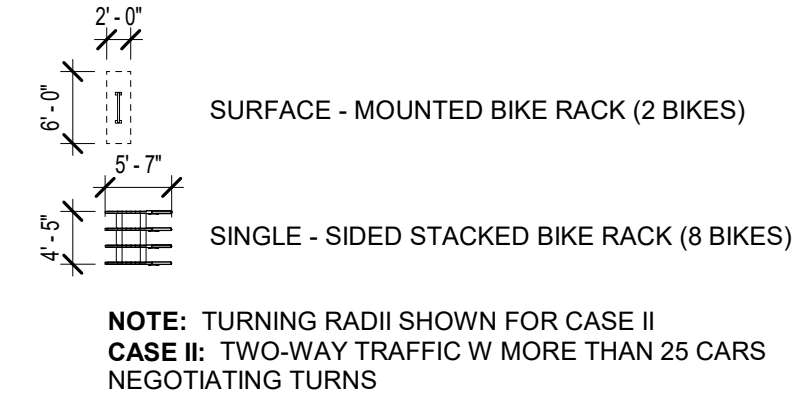
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LEVEL 01 FLOOR PLAN

Project Number: 2021034
 Sheet Number: **A2.01**



PARKING LEGEND

	RETAIL	RESIDENTIAL	ACCESSIBLE	TOTAL
LEVEL 03		59		59
LEVEL 02		110	4	114
LEVEL 01	28	60	4	92
LEVEL B1		146	1	147
				412

1 LEVEL 02 FLOOR PLAN
 SCALE: 1/16" = 1'-0"

 1/16" = 1'-0" NORTH



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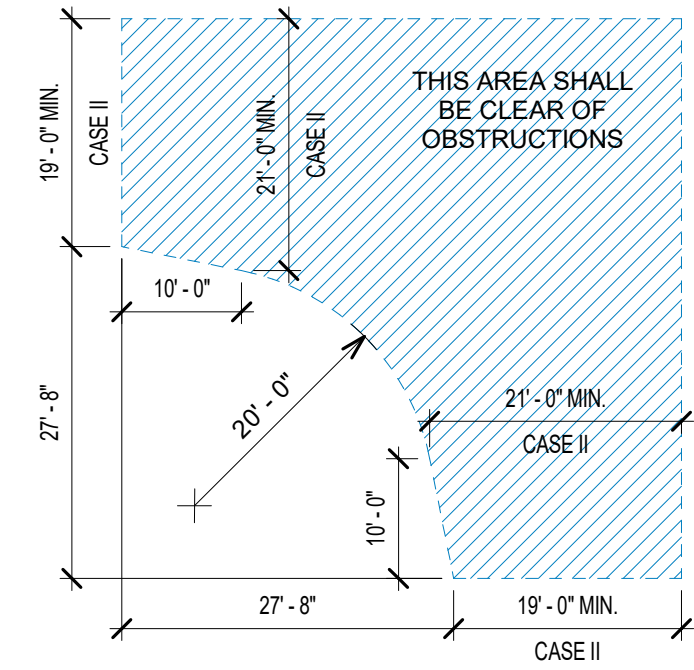
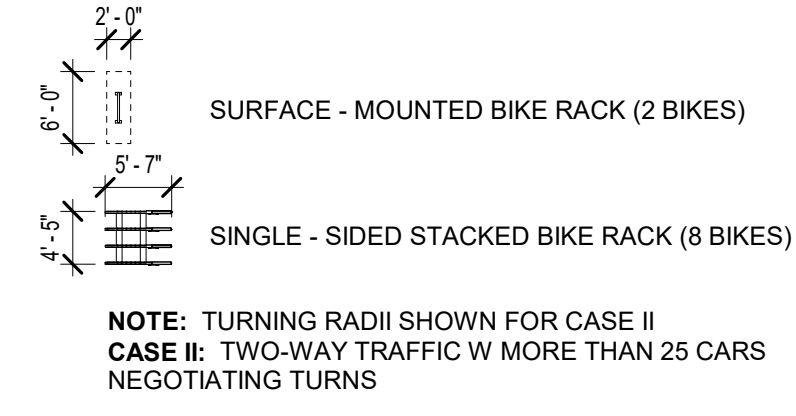
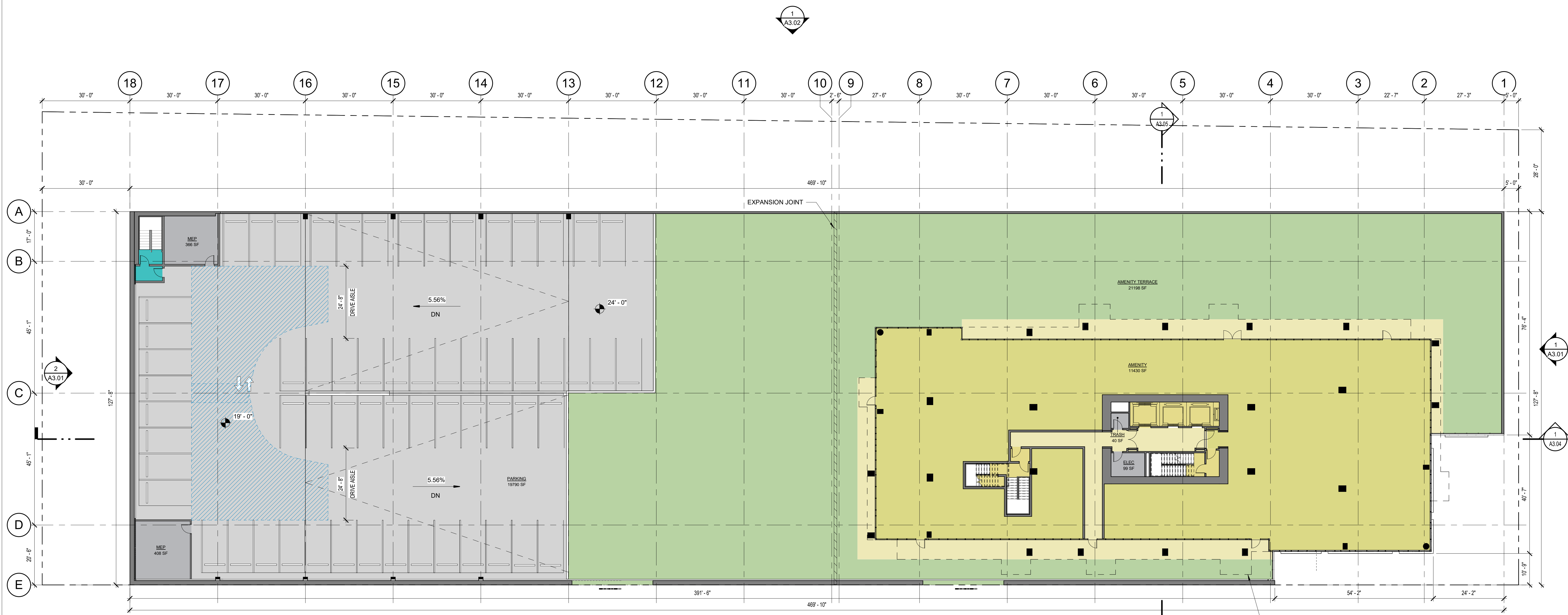
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LEVEL 02 FLOOR PLAN

Project Number: 2021034

Sheet Number: **A2.02**



PARKING LEGEND

	RETAIL	RESIDENTIAL	ACCESSIBLE	TOTAL
LEVEL 03		59		59
LEVEL 02		110	4	114
LEVEL 01	28	60	4	92
LEVEL B1		146	1	147
				412

1 LEVEL 03 FLOOR PLAN
 SCALE: 1/16" = 1'-0"
 0 8' 16' 32'
 1/16" = 1'-0" NORTH



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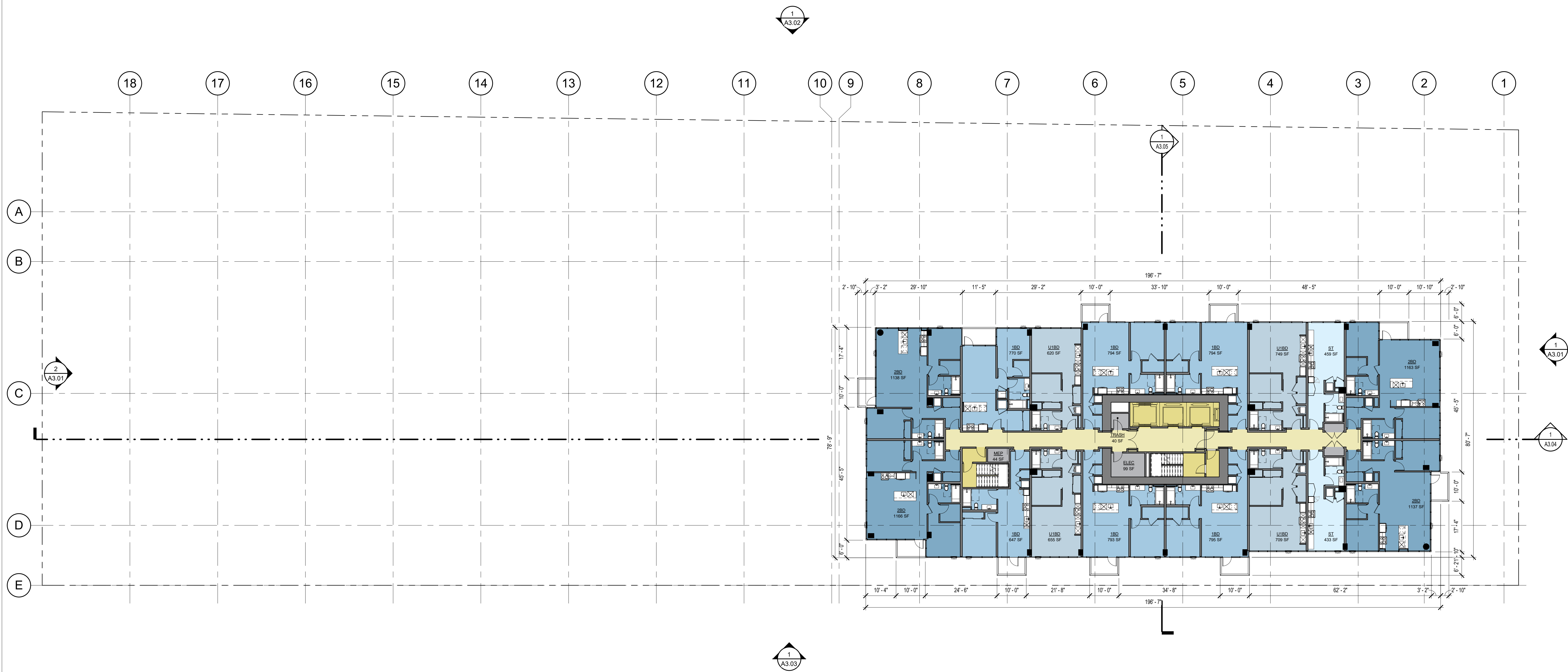
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LEVEL 03 FLOOR PLAN

Project Number: 2021034

Sheet Number: **A2.03**



1 LEVELS 04-11 FLOOR PLAN
 SCALE: 1/16" = 1'-0"
 0 8' 16' 32'
 1/16" = 1'-0" NORTH



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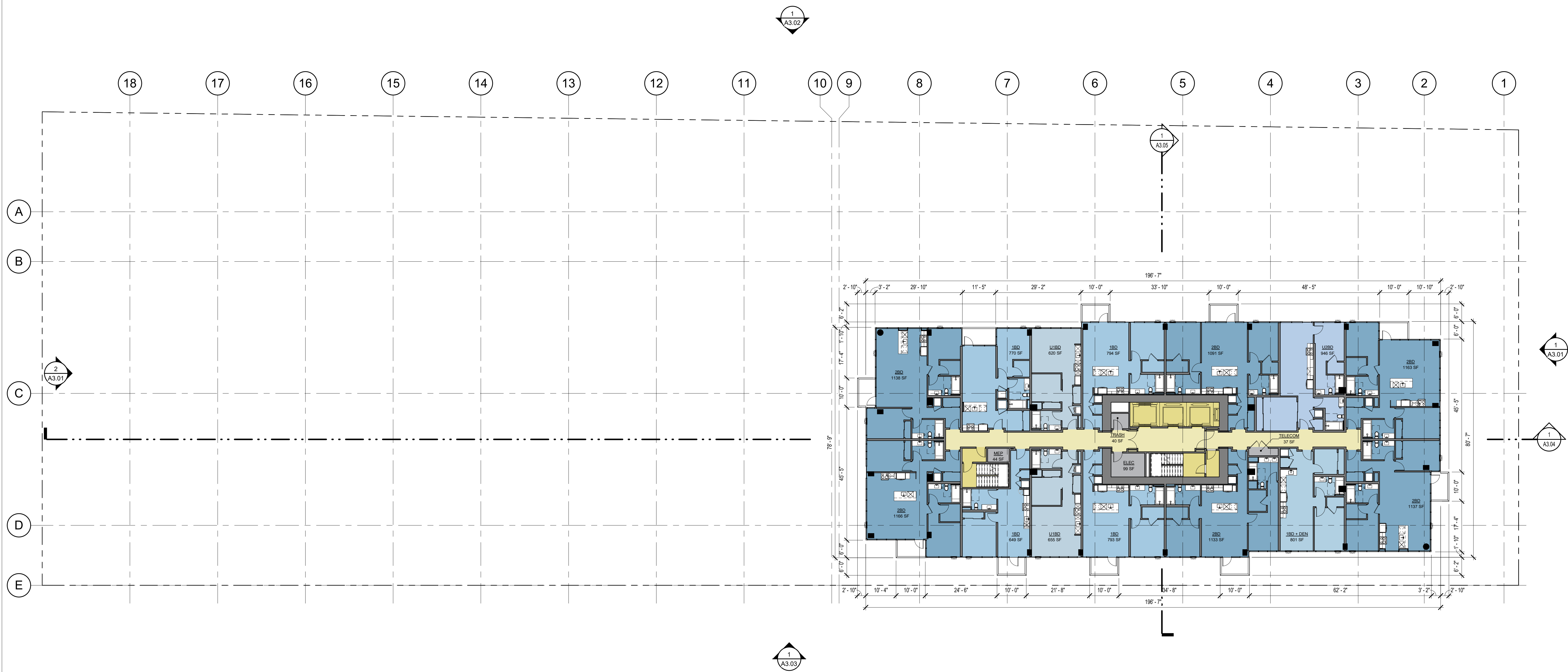
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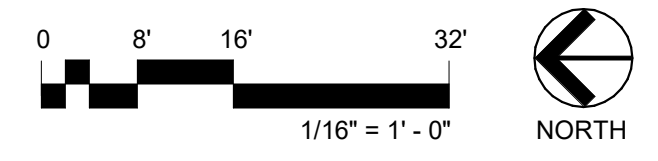
**LEVELS 04-11
 FLOOR PLAN**

Project Number: 2021034

Sheet Number: **A2.04**



2 LEVELS 12-22 FLOOR PLAN
SCALE: 1/16" = 1'-0"



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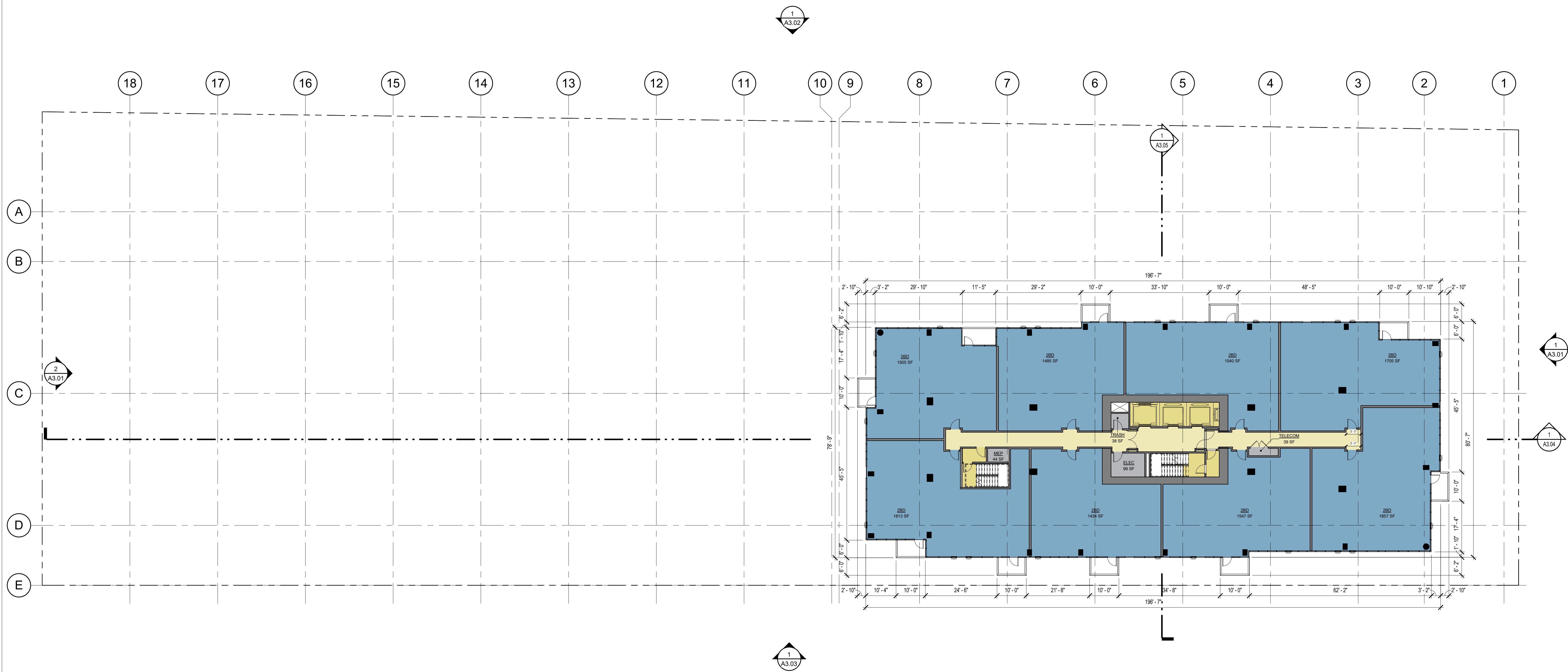
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**LEVELS 12-22
FLOOR PLAN**

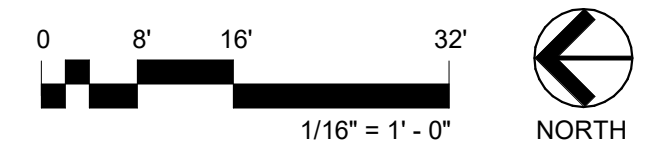
Project Number: 2021034

Sheet Number: **A2.12**



NOTE: UNITS @ LEVEL 27 COUNTED AS > 3 H.R.
FOR OPEN SPACE CALCULATIONS

1 LEVEL 23 - FLOOR PLAN
SCALE: 1/16" = 1'-0"



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NO.	DATE	DESCRIPTION

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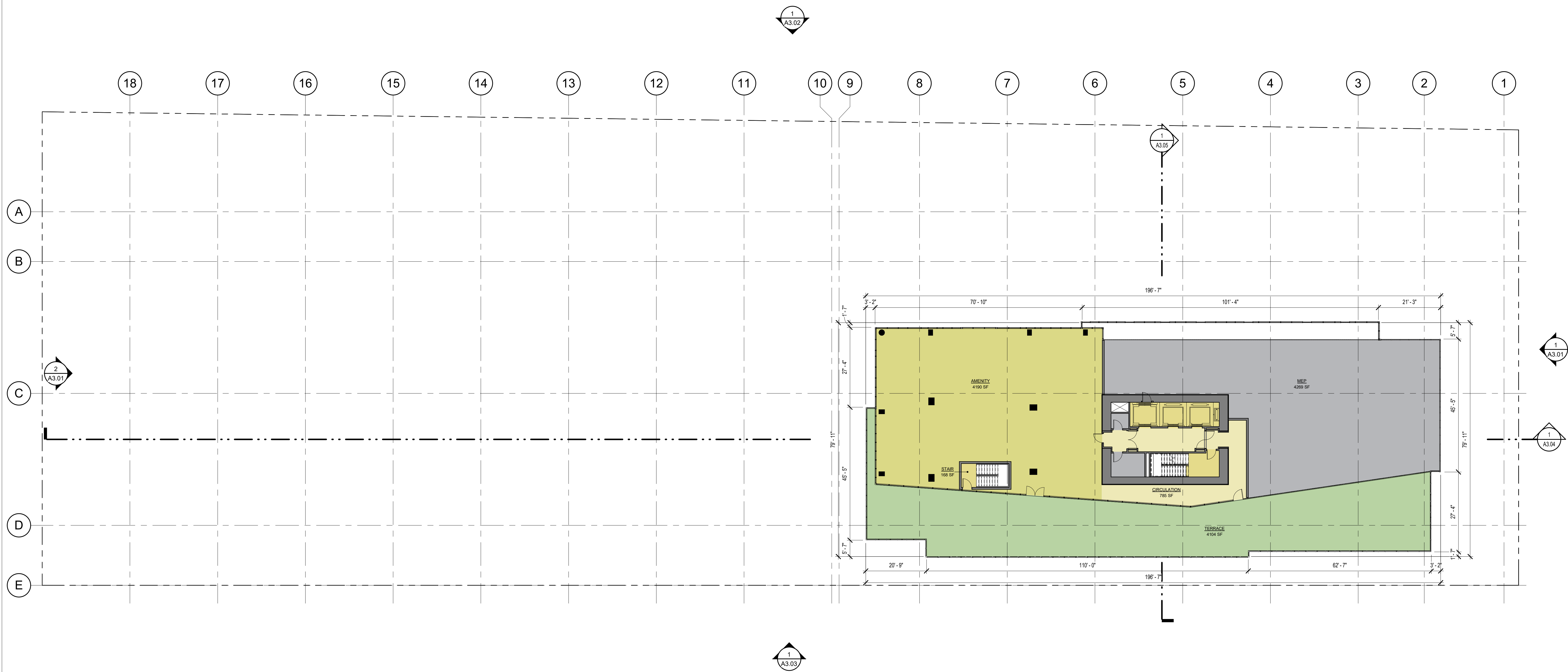
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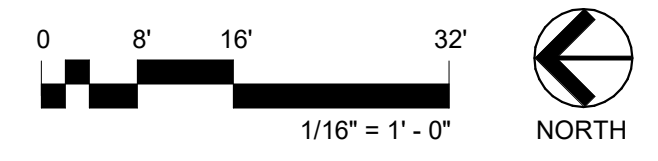
LEVEL 23 FLOOR PLAN

Project Number: 2021034

Sheet Number: **A2.23**



1 LEVEL 24 - SKYDECK FLOOR PLAN
 SCALE: 1/16" = 1'-0"



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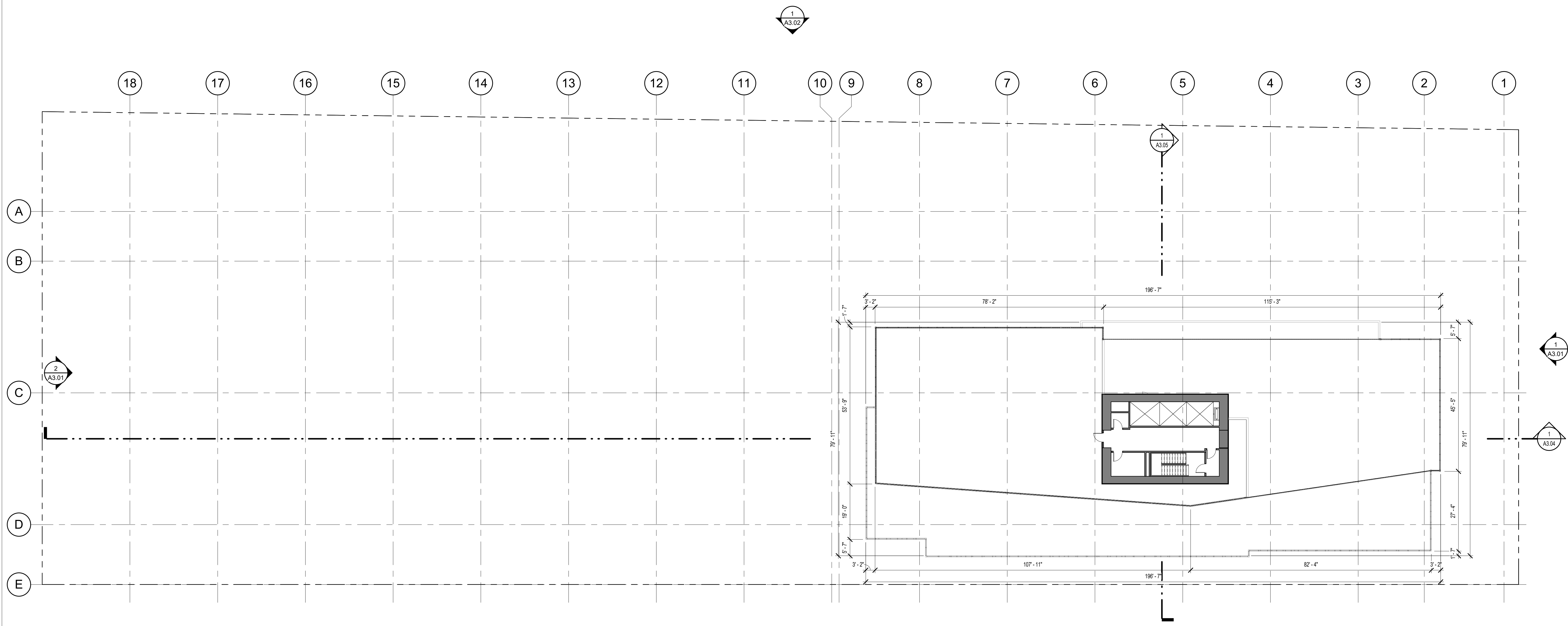
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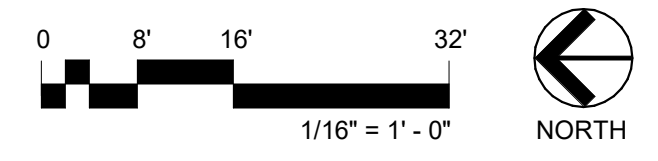
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LEVEL 24 - SKYDECK FLOOR PLAN

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 Sheet Number: **A2.24**



1 ROOF LEVEL FLOOR PLAN
SCALE: 1/16" = 1'-0"



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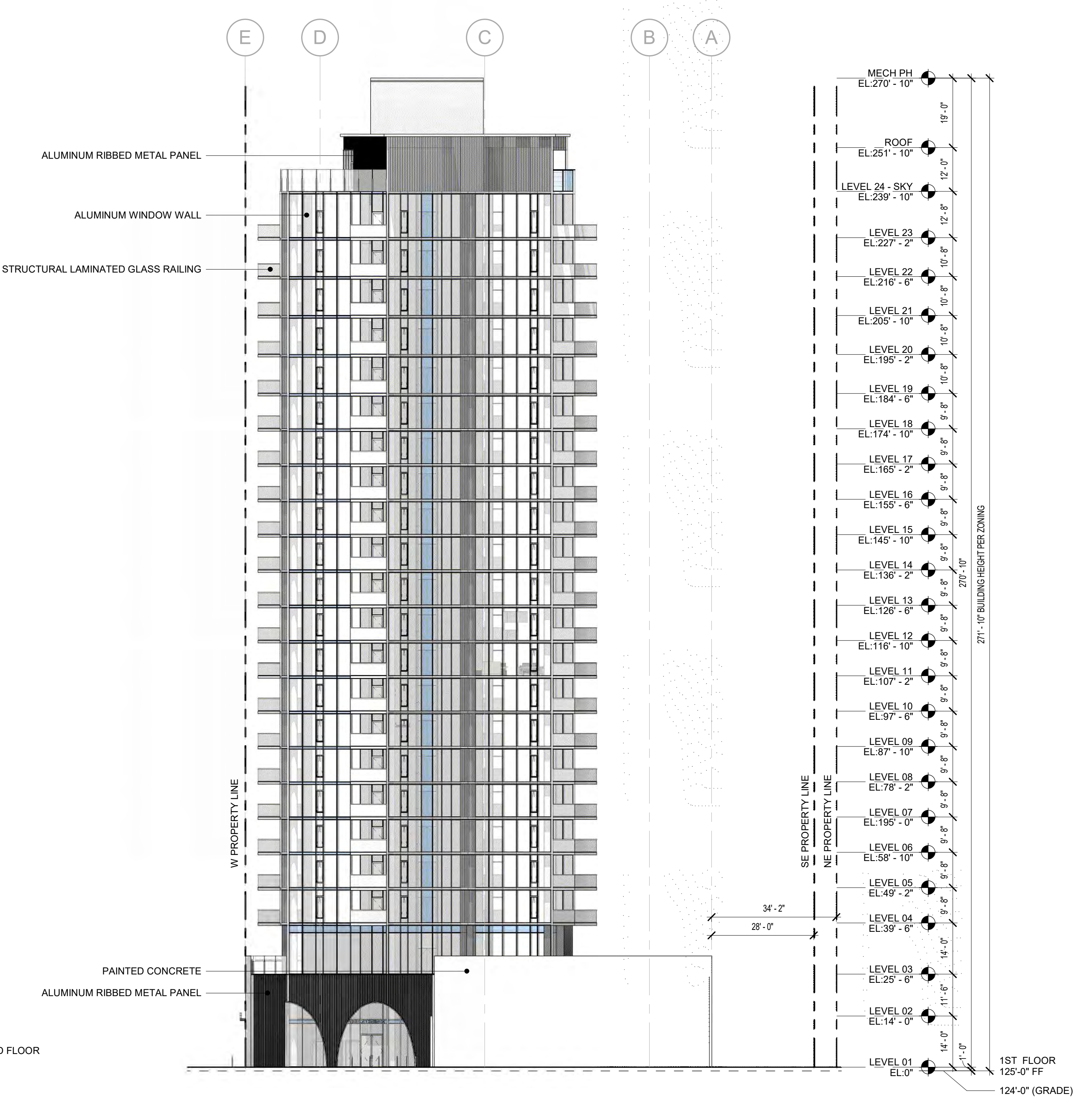
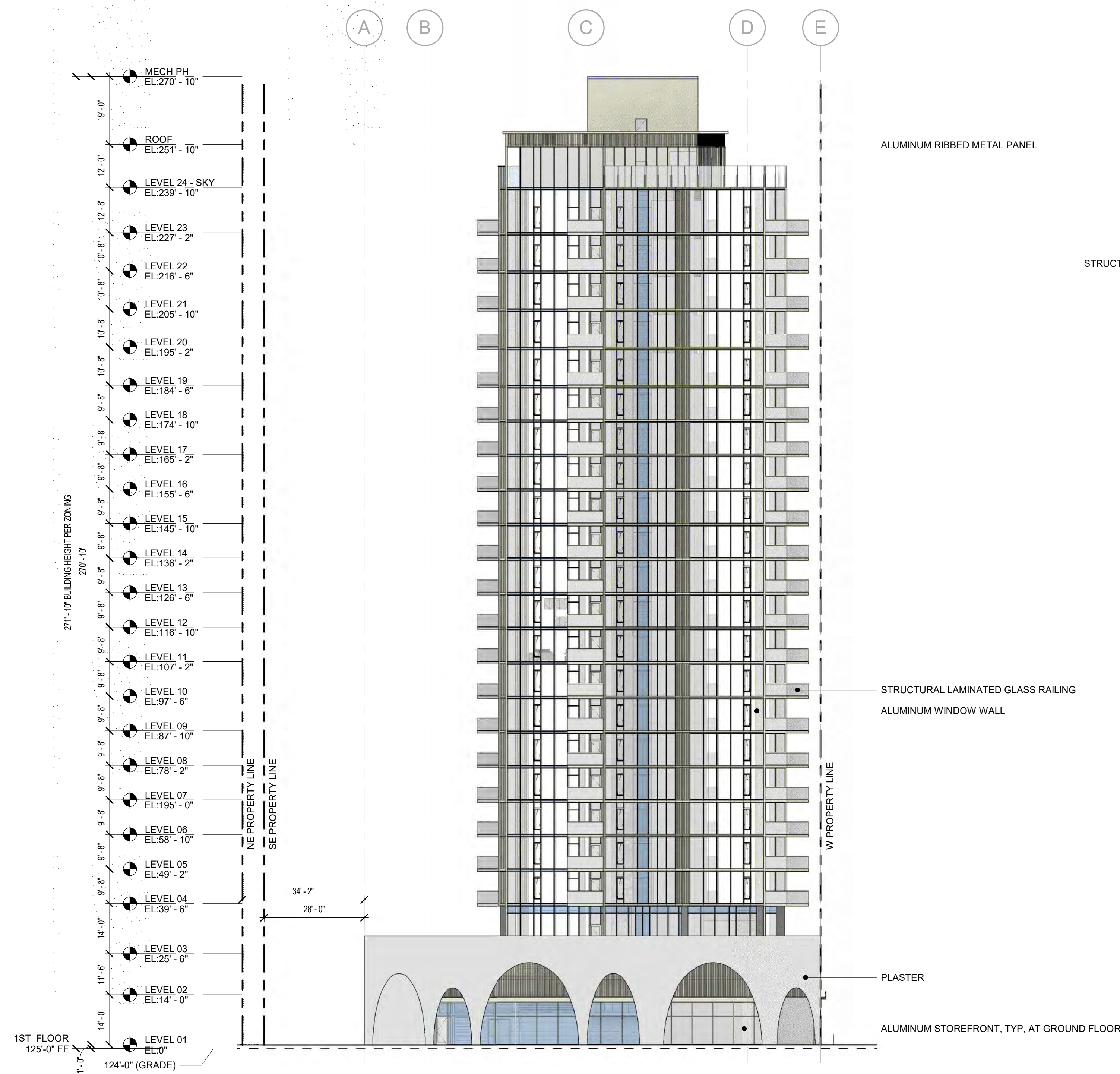
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ROOF LEVEL FLOOR PLAN

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Sheet Number: **A2.25**

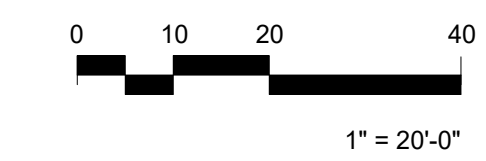


EXTERIOR FINISH LEGEND

FINISH	LOCATION
ALUMINUM - BRONZE FINISH	GROUND FLOOR STORE FRONT, TOWER WINDOW WALL, TRIM ELEMENTS
PLASTER	PODIUM EXTERIOR WALLS
STRUCTURAL LAMINATED GLASS	RAILINGS AT UNIT BALCONIES

2 BUILDING ELEVATION - NORTH
SCALE: 1" = 20'-0"

1 BUILDING ELEVATION - SOUTH
SCALE: 1" = 20'-0"



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NO.	DATE	DESCRIPTION

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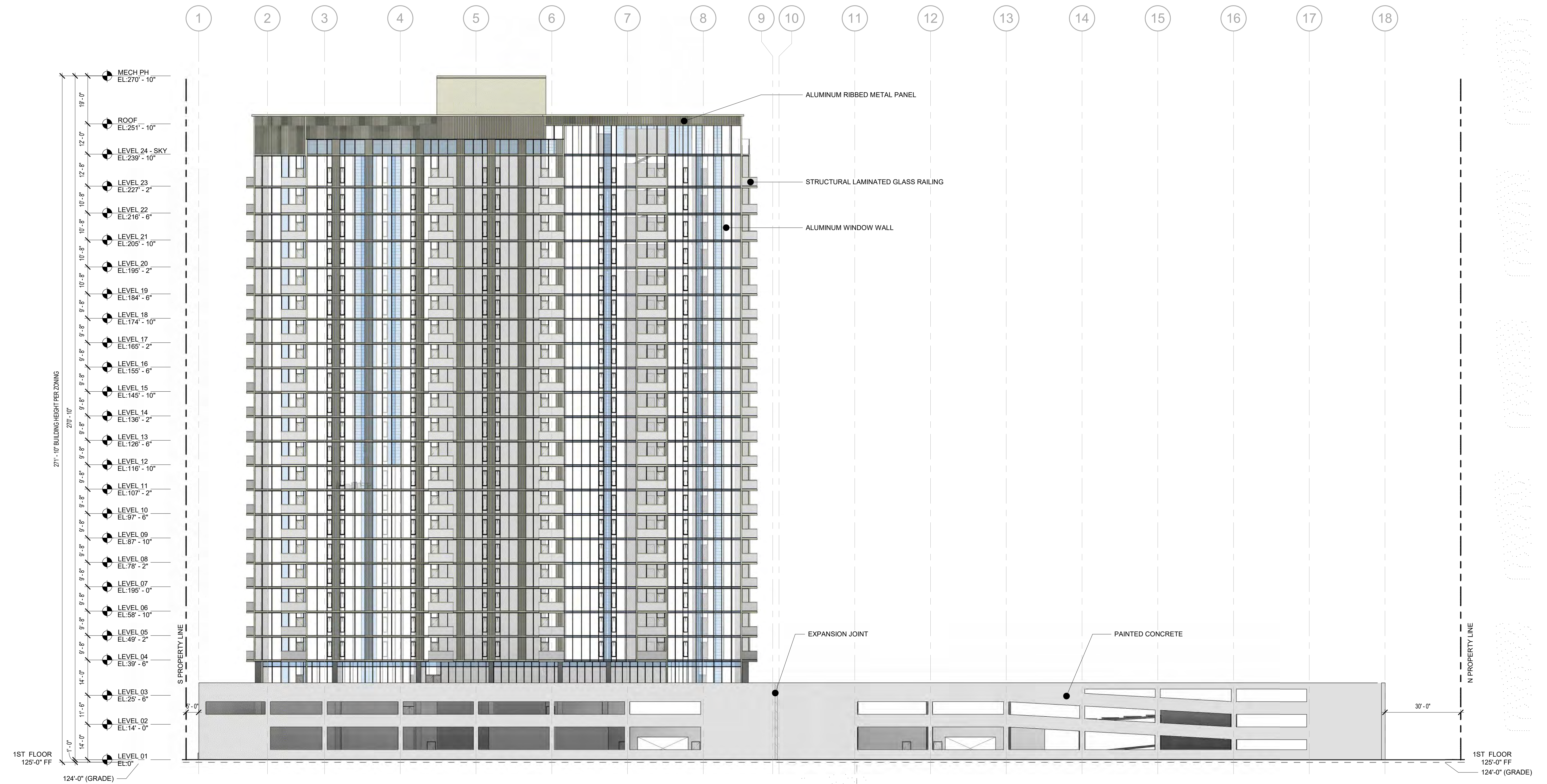
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BUILDING ELEVATIONS

Project Number: 2021034

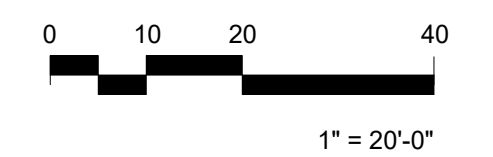
Sheet Number: **A3.01**



EXTERIOR FINISH LEGEND

FINISH	LOCATION
ALUMINUM - BRONZE FINISH	GROUND FLOOR STORE FRONT, TOWER WINDOW WALL, TRIM ELEMENTS
PLASTER	PODIUM EXTERIOR WALLS
STRUCTURAL LAMINATED GLASS	RAILINGS AT UNIT BALCONIES

1 BUILDING ELEVATION - EAST
SCALE: 1" = 20'-0"



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NO.	DATE	DESCRIPTION

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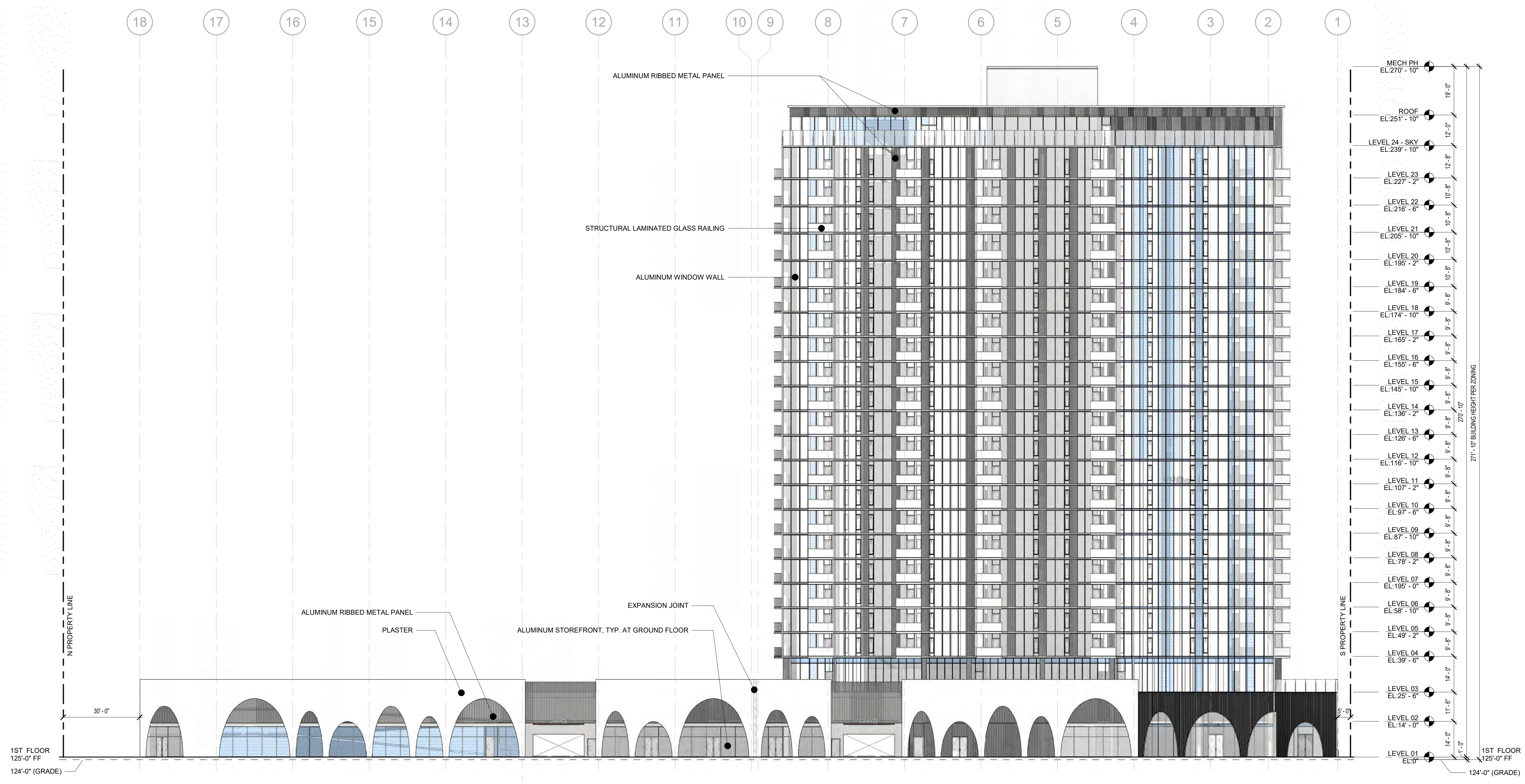
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BUILDING ELEVATIONS

Project Number: 2021034

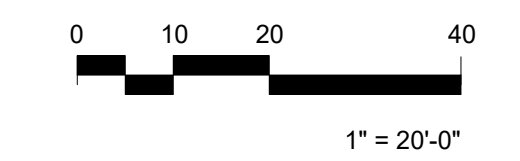
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EXTERIOR FINISH LEGEND

FINISH	LOCATION
ALUMINUM - BRONZE FINISH	GROUND FLOOR STORE FRONT, TOWER WINDOW WALL, TRIM ELEMENTS
PLASTER	PODIUM EXTERIOR WALLS
STRUCTURAL LAMINATED GLASS	RAILINGS AT UNIT BALCONIES

1 BUILDING ELEVATION - WEST
SCALE: 1" = 20'-0"



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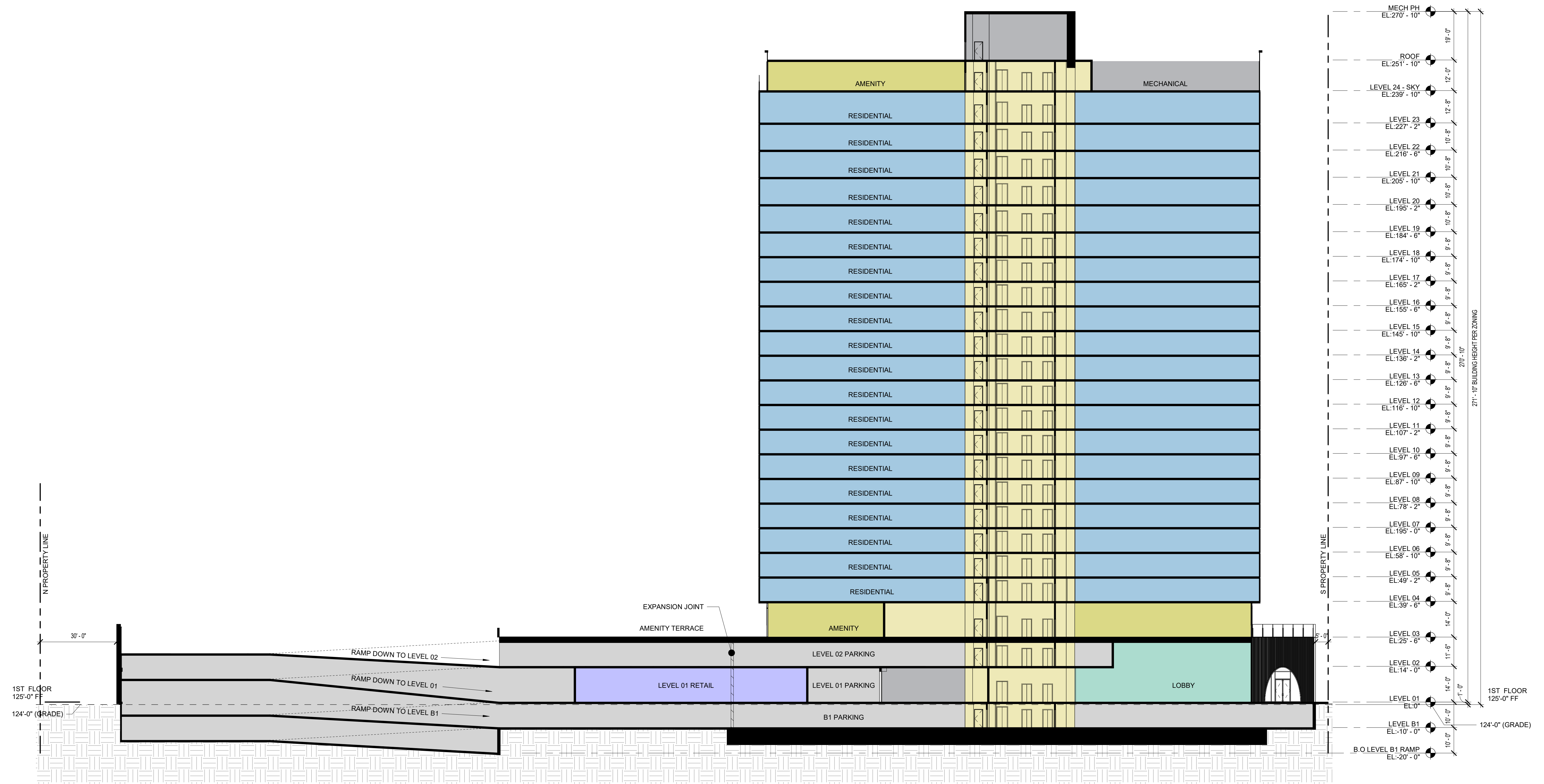
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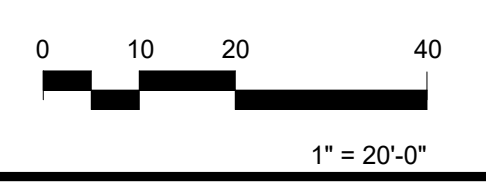
**BUILDING
ELEVATIONS**

Project Number: 2021034

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1 BUILDING SECTION
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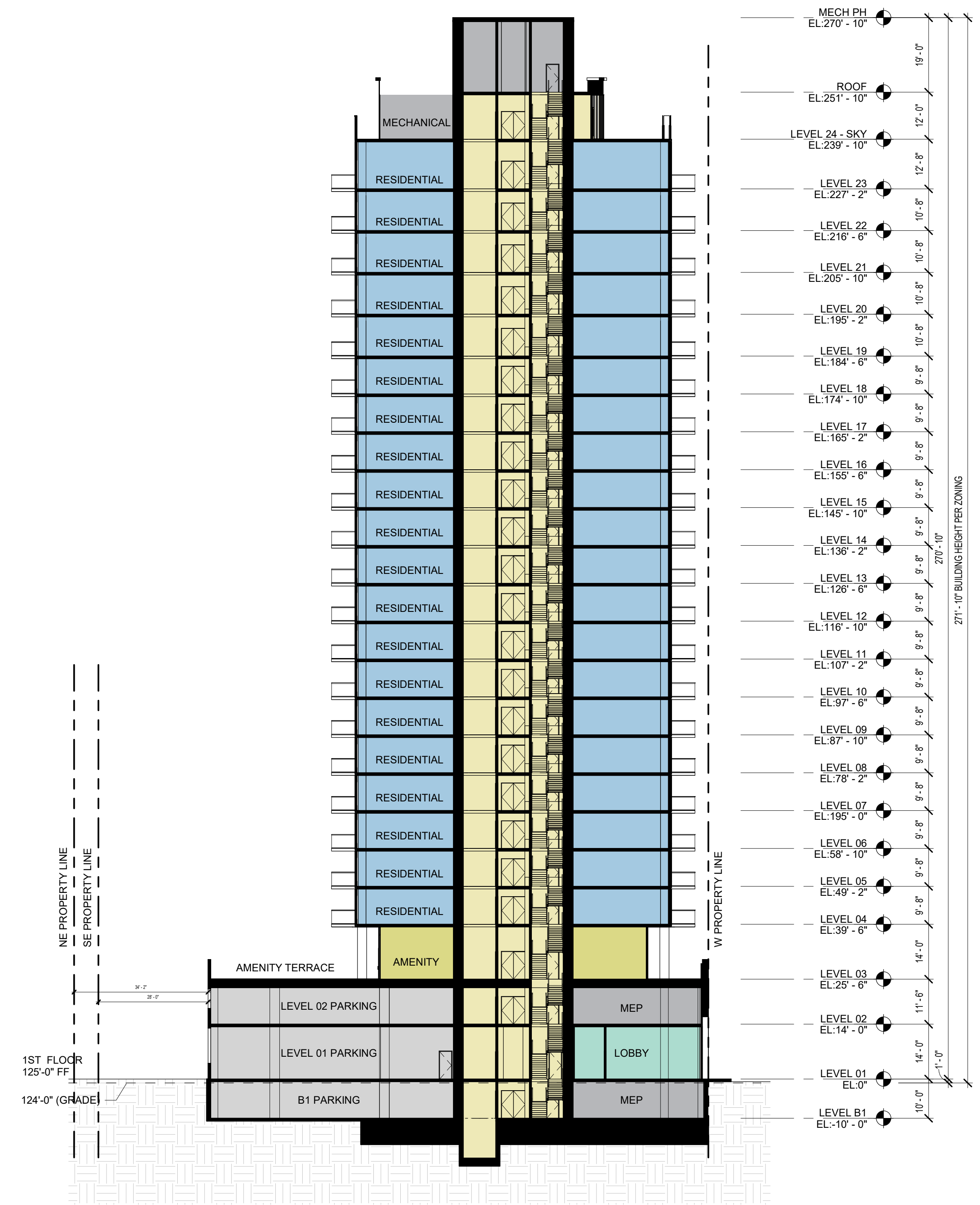
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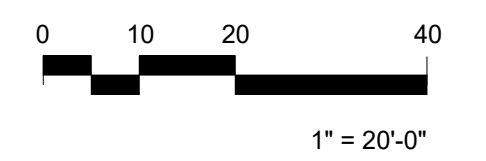
BUILDING SECTIONS

Project Number: 2021034

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1 BUILDING SECTION
SCALE: 1" = 20'-0"



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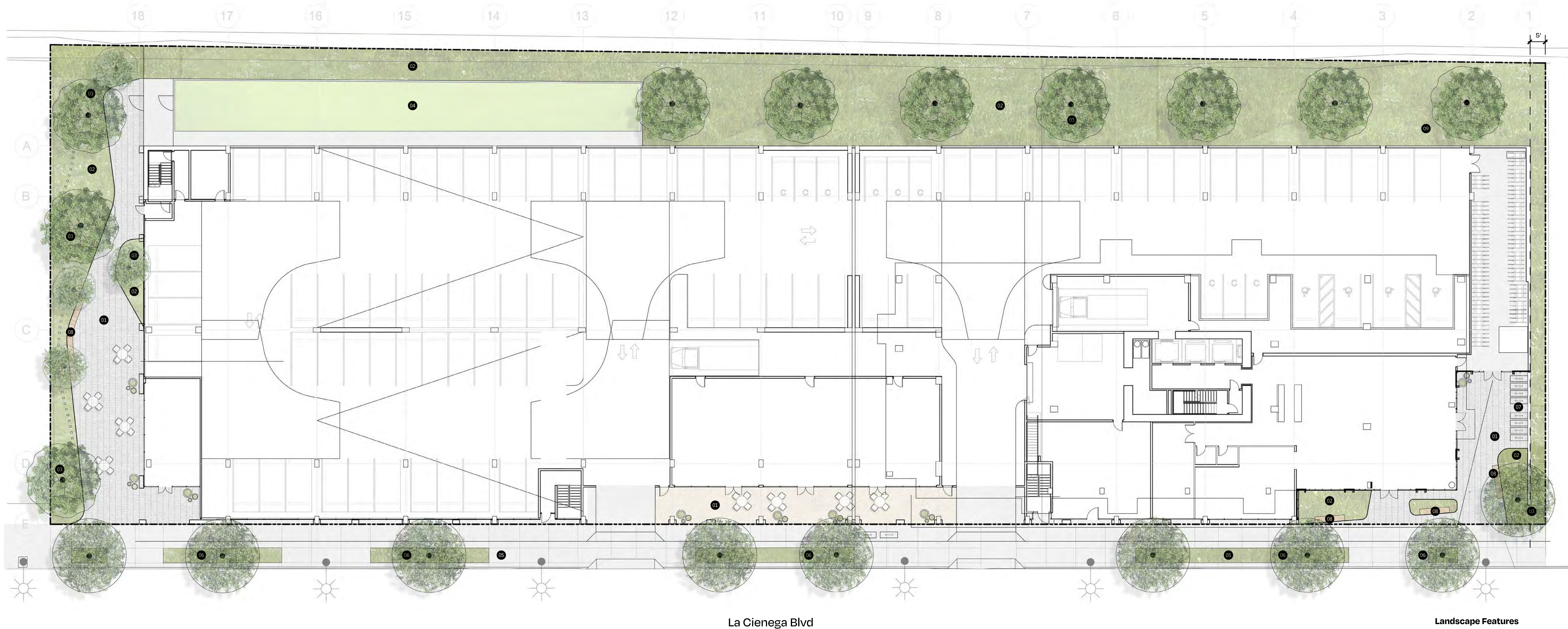
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BUILDING SECTIONS

Project Number: 2021034
Sheet Number: **A3.05**

TREE SCHEDULE

TREES	CODE	BOTANICAL NAME	COMMON NAME	SIZE	WUCOLS	QTY
	CHI LIN	CHILOPSIS LINEARIS	DESERT WILLOW	36" BOX	VERY LOW	3
	CUP ANA	CUPANIOPSIS ANACARDIODES	CARROT WOOD	48" BOX	MEDIUM	8
	PLA SYC	PLATANUS RACEMOSA	CALIFORNIA SYCAMORE MULTI-TRUNK	48" BOX	MEDIUM	4



- Landscape Features**
- 01 Hardscape Area
 - 02 Planting Area
 - 03 Tree, See Schedule
 - 04 Dog Area
 - 05 Parkway
 - 06 Street Tree
 - 07 Bike Stalls
 - 08 Benches
 - 09 Trellis



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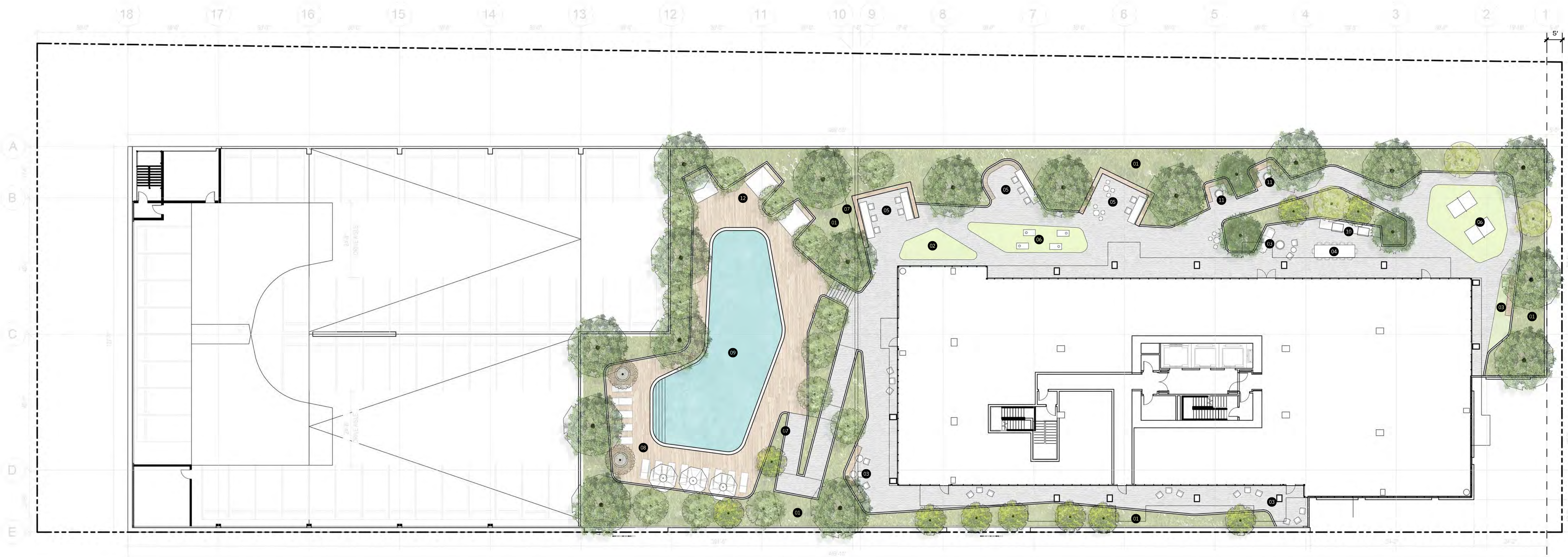
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**LEVEL 1
GROUND FLOOR
PLAN**

Project Number:
Sheet Number: **L1.01**

TREE SCHEDULE						
TREES	CODE	BOTANICAL NAME	COMMON NAME	SIZE	WUCOLS	QTY
	AGO FLE	AGONIS FLEXUOSA	PEPPERMINT TREE	48" BOX	LOW	17
	ARC HUR	ARCTOSTAPHYLOS MANZANITA 'DR. HURD'	DR. HURD COMMON MANZANITA	36" BOX	LOW	3
	CEI SPE	CEIBA SPECIOSA	FLOSS SILK TREE	36" BOX		13

	PAR FLO	PARKINSONIA FLORIDA	BLUE PALO VERDE	36" BOX		2
	MEL PIN	MELALEUCA NESOPHILA	PINK MELALEUCA MULTI-TRUNK	36" BOX	LOW	3
	CHI TAS	X CHITALPA TASHKENTENSIS	CHITALPA	36" BOX		10



- Landscape Features**
- 01 Planting Area
 - 02 Outdoor Fitness
 - 03 Lounge Area
 - 04 Al Fresco Dining Area
 - 05 Co-Working Spaces
 - 06 Gaming and Relaxation Lawn
 - 07 Pool Fence
 - 08 Sun Deck
 - 09 Pool
 - 10 BBQ Area
 - 11 Fire Lounge
 - 12 Cabanas



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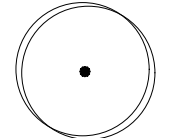
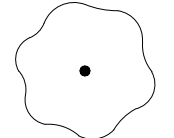
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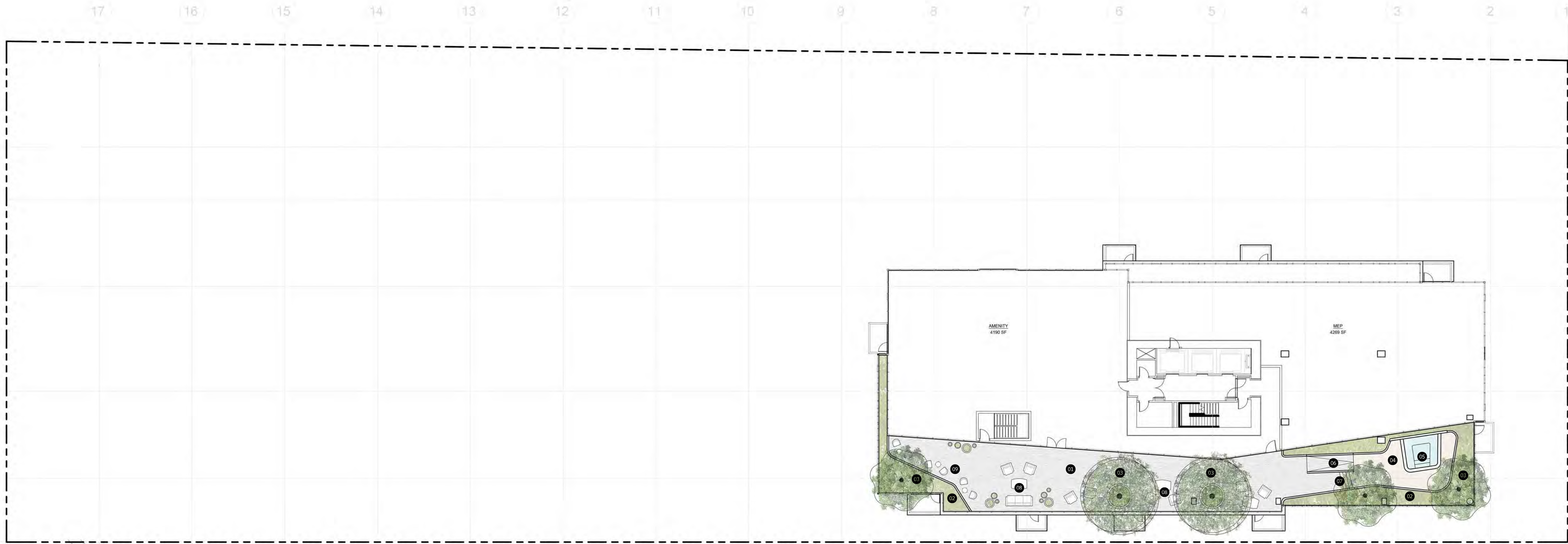
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**LEVEL 3
AMENITY LEVEL
PLAN**

Project Number:
Sheet Number: **L1.03**

TREE SCHEDULE

TREES	CODE	BOTANICAL NAME	COMMON NAME	SIZE	WUCOLS	QTY
	MAY MUL	MAYTENUS BOARIA	MAYTEN TREE MULTI-TRUNK	48" BOX	MEDIUM	2
	OLE WIL	OLEA EUROPAEA 'WILSONII'	WILSON OLIVE	36" BOX	LOW	3



Landscape Features

- 01 Hardscape Area
- 02 Planting Area
- 03 Tree, See Schedule
- 04 Wood Deck
- 05 Spa Pool
- 06 Ramp
- 07 Stairs
- 08 Lounge Area
- 09 Cafe Seating



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**LEVEL 24
 ROOF LEVEL
 AMENITY PLAN**

Project Number:
 Sheet Number: **L1.24**

EXHIBIT D

ENVIRONMENTAL DOCUMENTS

ENV-2022-2280-SCEA

Updated Appendices

Revised Memo

ORIGINAL SCEA:

<https://planning.lacity.gov/development-services/environmental-review/scea/1050-la-cienega-boulevard-project>



9410 Topanga Canyon Boulevard, Suite 101
Chatsworth, CA 91311
Phone 310-469-6700

August 3, 2023

City of Los Angeles
Los Angeles City Planning
200 N. Spring Street, Room 700
Los Angeles, CA 90012

Memorandum re: 1050 La Cienega Boulevard Project (ENV-2022-2280-SCEA, DIR-2022-2279-TOC-SPR-VHCA)

1 Introduction

On September 8, 2022, the City of Los Angeles (City) published a Sustainable Communities Environmental Assessment (SCEA) for the 1050 La Cienega Boulevard Project (SCEA Project) in compliance with the California Environmental Quality Act (CEQA). The SCEA was adopted by the City Council on November 22, 2022.

Following publication of the SCEA, the Applicant has proposed minor changes to the SCEA Project, including moving the tower structure south on the Site, reducing its height, reducing the commercial development, increasing open space, and reducing the parking count (Revised Project).

This Memorandum provides a review of the SCEA’s existing analyses and discusses any changes to the SCEA that could be necessary for the upcoming approval hearings for the Revised Project. As demonstrated below, nothing has changed that would affect the analyses or significance conclusions set forth in the SCEA, including any of the circumstances described by CEQA Guidelines Section 15162.

2 Project Description

The changes to the SCEA Project are identified in **Table 1**. The revised plans are included as **Appendix A** to this Memo.

**Table 1
Project Scope**

	SCEA Project	Revised Project	Change
Residential	290 units	290 units	No change
Commercial	7,500 sf	5,260 sf	Reduced 2,240 sf
Project Floor Area	297,690 sf	297,690 sf	No change
Open Space	54,540 sf	62,289 sf	Increased 7,749 sf
Parking	426 spaces	412 spaces	Reduced 14 spaces
Bicycle Parking	20 short, 164 long-term	20 short, 164 long-term	No change
Height	28 stories, 332 feet	24 stories, 271 feet, 10 inches	Reduced 4 stories, 60 feet
Tower Location	Northwest area of Site	Southwest area of Site	Moved south
Driveways	2	2	Driveways shifting slightly
Rear Yard Setback	15 feet	28 feet	Increased 13 feet
Subterranean Levels	1 level (B1)	1 level (B1)	No change

Export amount	48,913 cy	45,670 cy	Decreased 3,243 cy
SCEA Project: <u>Plans</u> , SCB, March 4, 2022.			
Revised Project: <u>Plans</u> , SCB, July 14, 2023.			

3 SCEA Findings

3.1 Consistency with Transit Priority Project Criteria

The Revised Project is located at the same site as the SCEA Project, and the number of residential units remains the same. Therefore, no changes are required to the SCEA’s consistency discussion regarding compliance with the criteria under California Public Resources Code Section 21155(a) and (b).

4 SCEA Analysis

4.1 Aesthetics

The SCEA concluded that no impacts to aesthetics would occur pursuant to the provisions of Senate Bill (SB) 743 that provide: “Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment.” The Revised Project continues to be subject to SB 743 and no aesthetics impacts would occur. Notwithstanding, the SCEA provided an analysis of potential aesthetics impacts for informational purposes. Moving the building’s tower from the north of the Site to the south does not change the SCEA’s discussion of aesthetics since the tower would still be located onsite and would be approximately the same distance from the residential neighborhood to the east. In addition, reducing the height of the tower by four stories (~60 feet) would reduce any potential aesthetic impacts. Accordingly, the Revised Project does not result in any new impacts or any need for new mitigation measures.

4.2 Agriculture and Forestry Resources

The SCEA analysis did not identify any impacts to agriculture and forestry resources. The Revised Project does not affect the SCEA’s discussion or conclusions in this regard. There are no new impacts and no new mitigation measures.

4.3 Air Quality

The SCEA analysis concluded that less than significant impacts to air quality would occur. The Revised Project would have the same floor area as the SCEA Project and would retain the same number of residential units; the amount of reduced retail space in the SCEA Project has been added to the building’s residential space to allow for larger units and amenity spaces. Thus, the Revised Project’s emissions would remain similar and below the thresholds of significance. To verify this, a revised air quality report and technical modeling is included as **Appendix B** to this Memo. The evaluation accounts for the South Coast Air Quality Management District’s (SCAQMD) latest 2022 Air Quality Management Plan (2022 AQMP) and updates to the CalEEMod emissions modeling software, released after the SCEA was published, in addition to the minor changes in the Revised Project. Overall, air quality impacts associated with the Revised Project would remain less than significant. Regarding the City’s Air Quality Element, the Revised Project and its land uses are substantially similar to the SCEA Project and would therefore be consistent with the goals and policies of the Air Quality Element for the same reasons as the SCEA Project. Construction and operational emissions of the Revised Project would be below SCAQMD regional thresholds and LSTs and therefore represent a less than significant impact. There are no new impacts and

no new mitigation measures are required.

As part of the SCEA, for informational purposes, a construction Health Risk Assessment (HRA) was conducted to quantify the potential impact of diesel particulate matter (DPM), which is identified as a toxic air contaminant pursuant to California Code of Regulations (CCR) Section 93001, and is associated with the generation of off-road equipment emissions during construction of the SCEA Project. The HRA quantified both carcinogenic risks and noncarcinogenic hazards for the maximum exposed sensitive receptors adjoining the Site. To ensure a viable quantification of exposure, the technical approach used in the preparation of the HRA was composed of all relevant and appropriate assessment and dispersion modeling methodologies presented by the U.S. Environmental Protection Agency (EPA), California EPA, and SCAQMD. Results of the HRA showed that carcinogenic risk and noncarcinogenic hazard estimates for the maximum exposed sensitive receptors did not exceed identified significance thresholds. A revised HRA, reflecting the minor changes associated with the Revised Project, has been prepared for informational purposes and is included as **Appendix C** to this Memo. Consistent with the original HRA prepared for the SCEA Project, the revised HRA demonstrates that the Revised Project's construction-related emissions would also not result in unacceptable localized impacts, and would in fact produce lower carcinogenic risk and noncarcinogenic hazard estimates than reflected in the SCEA Project emissions scenario. There are no new impacts and no new mitigation measures are required.

4.4 Biological Resources

The SCEA analysis concluded that no impacts to biological resources would occur. The Revised Project would continue to be located on a vacant disturbed site that does not have potential to support habitat, wetlands, protected waters, or protected species, and therefore no changes are required to the SCEA's discussion or conclusions. There are no new impacts and no new mitigation measures are required.

4.5 Cultural Resources

The SCEA analysis concluded that less than significant impacts to historical resources and archaeological resources would occur with incorporation of mitigation measures, and no impact to human remains would occur.

4.5.1 Historical Resources

The SCEA analyzed potential direct impacts to historic resources due to the Project's proposed construction activities (excavation, shoring, etc.). Mitigation Measures MM-NOI-8 through MM-NOI-10, as described in the noise and vibration technical report prepared by NTEC and under Checklist Topic XIII (Noise) of the SCEA, would ensure the Project's construction activities would not result in building vibration-related damage to the contributing historical structures that abut the Project Site to the east. These measures mandate setbacks from the property line for certain construction activities as well as equipment and require preconstruction surveys, a vibration monitoring program during the Project's excavation phase and adherence to specified structural performance standards. Moreover, because the Project could utilize one of two potential foundation designs, the SCEA appropriately analyzed both potential designs and associated noise/vibration levels and identified appropriate mitigation to address the most potentially impactful scenario. Therefore, potential direct impacts from construction and excavation would be less than significant. The Revised Project does not affect the SCEA's discussion or conclusions, as similar construction activities would be required on the same Site for the Revised Project. There are no new impacts and no new mitigation measures relating to potential direct impacts to historical resources.

The SCEA analyzed potential indirect impacts to historic resources relating to introduction of a new tall building visible to the South Carthay HPOZ and Carthay Neighborhoods Historic District. The SCEA and the supporting historical resources technical memorandum concluded that none of the identified character-defining features of the setting, including the street pattern, setbacks, mature street trees, arrangement of single-family and multi-family residences, and period revival architectural styles would be materially impaired by the SCEA Project, and both South Carthay HPOZ and the Carthay Neighborhoods Historic District would remain eligible for designation. Therefore, the SCEA Project's indirect impacts on historical resources would be less than significant.

As analyzed by the revised historic memo (included as **Appendix D** to this Memo), the Revised Project will include a shorter tower and a simplified plan, and will be located a greater distance from the Site's eastern property line. The location of the tower will also be shifted southward. None of these characteristics of the Revised Project pose any new indirect impacts to the adjacent South Carthay HPOZ or the larger Carthay Neighborhoods Historic District. Therefore, like the SCEA Project, the Revised Project would not pose a significant indirect impact to historical resources. There are no new impacts and no new mitigation measures are required.

4.5.2 Archaeological Resources

The SCEA analyzed potential impacts to archaeological resources and determined that with incorporation of Mitigation Measure MM-CUL-1, potential impacts related to the inadvertent discovery of unknown archaeological resources would be less than significant. The SCEA's conclusion does not change for the Revised Project since excavation would still be necessary at the Site, and the same Mitigation Measure would be implemented. There are no new impacts and no new mitigation measures are required.

4.5.3 Human Remains

The SCEA analyzed potential impacts pertaining to human remains and concluded that through required compliance with applicable regulatory measures, no impacts would occur. The SCEA's conclusion does not change for the Revised Project since excavation would still be necessary at the Site, and the same regulatory measures would apply. There are no new impacts and no new mitigation measures are required.

4.6 Energy

The SCEA concluded that less than significant impacts to energy would occur. The energy demand (electricity and natural gas) and transportation demand (fuels) of the Revised Project would be reduced, as shown in **Tables 2** and **3** and as further described below (calculations included as **Appendix E** to this Memo). This is due to the additional energy conservation measures including those required under current building codes that have been incorporated into the updated CalEEMod modeling. There are no new impacts and no new mitigation measures are required.

Regarding construction-period energy demand, as described in the SCEA, Project construction activities would consume relatively minor quantities of electricity (i.e., temporary use for lighting and small power tools), which would be supplied to the Project Site by LADWP based on existing upgrades which are currently underway and would be obtained from electrical lines to be connected to the Project Site. Electricity consumed during Project construction would be temporary and would cease upon the completion of construction, as well as vary depending on site-specific operations and the amount of construction occurring at any given time. Overall, construction activities associated with the Project would require limited electricity generation that would not be expected to have an adverse impact on available

electricity supplies. Similarly, transportation fuels, primarily gasoline and diesel, utilized by project-related vehicles during construction would require a negligible fraction of the state’s total transportation fuel consumption. As shown in **Table 2**, the construction-period energy demanded by both the SCEA Project and the Revised Project would be the same due to the same schedule and number of workers anticipated, and the transportation fuel would be reduced, due to the reduction in export amount.

Table 2
Summary of Construction Energy Use

	SCEA Project	Revised Project	Change
Electricity	85,511 kWh	85,511 kWh	0
Natural Gas	0	0	0
Transportation	978,211 gallons	965,261 gallons	-12,950 gallons
SCEA Project: CalEEMod 2020.4.0			
Revised Project: CalEEMod 2022.1.1.14.			

Regarding operation-period energy demand, electricity supply to the Project Site is provided by LADWP via overhead powerlines on La Cienega Boulevard. Currently, LADWP has a net maximum capacity of 1,664 megawatts (MW) and a net dependable capacity of 8,101 MW in 2022. Peak demand was 6,502 MW in 2017.¹ Demand would not exceed the existing capacity of 7,880 MW. Thus, there is adequate supply capacity to serve the Project, as it is projected that the Revised Project would consume an increase of approximately 1.6 megawatt hours per year of electricity. Electrical conduits, wiring, and associated infrastructure would be conveyed to the Project Site from existing LADWP lines near the Site. Thus, the Project’s electricity needs could be accommodated via existing electricity infrastructure.

Natural gas is provided to the Project Site by the Southern California Gas Company (SCG). Natural gas supply available to SCG from California sources averaged 97 million cubic feet per day (cf/day) in 2019. SCG projects total natural gas demand to decrease at an annual rate of 1.0 percent per year through 2035. This decrease is due to modest economic growth, CPUC-mandated energy efficiency standards and programs, tighter standards created by revised Title 24 codes and standards, renewable electricity goals, the decline in commercial and industrial demand, and conservation savings linked to Advanced Metering Infrastructure (AMI). Thus, with natural gas consumption becoming more efficient and decreasing, SCG projection for natural gas demand also decreases. SCG storage fields have a combined theoretical storage working inventory capacity of 130 billion cubic feet.

Transportation fuels, primarily gasoline and diesel, would be provided by local or regional suppliers and vendors. Project-related vehicles would require a negligible fraction of the total state’s transportation fuel consumption. In 2020, California consumed a total of 273,289 barrels of gasoline for transportation, which is equivalent to a total annual consumption of 11.4 billion gallons by the transportation sector.²

The Project will be all-electric (except for commercial kitchen restaurant natural gas demand). The Project would consume an estimated 498,278 kilo British thermal units (kBtu) of natural gas per year, the equivalent of approximately 474,455 cubic feet per year. Natural gas services are provided in accordance with SoCalGas’s policies and extension rules on file with the CPUC at the time contractual agreements are made. Natural gas is delivered to the Project Site through natural gas facilities underneath the adjacent public streets. Consistent with standard building practice, a detailed natural gas survey of the local

¹ LADWP, Power Strategic Longterm Resource Plan 2022, page ES-5.

² US EPA, State Energy Data System, Table F-3: http://www.eia.gov/state/seds/sep_fuel/html/pdf/fuel_mg.pdf, accessed August 2, 2023.

infrastructure equipment would be completed prior to construction to ensure that the current infrastructure can adequately sustain the demand for the Project. Based on the Project’s small fraction of total natural gas consumption for the region, ongoing SoCalGas long-range planning efforts to provide natural gas for this service region, and sufficient existing infrastructure, SoCalGas’ existing and planned natural gas supplies and infrastructure would be sufficient to meet the Project’s demand for natural gas.

The Project would be responsible for paying connection costs to connect its on-site service meters to existing infrastructure. SCG undertakes expansion and/or modification of the natural gas infrastructure to serve future growth within its service area as part of the normal process of providing service. There would be no disruption of service to other consumers during the installation of these improvements. Thus, the Project’s natural gas needs could be accommodated via existing natural gas infrastructure.

As shown in **Table 3**, the operation-period energy demanded by the Revised Project would be reduced compared to the SCEA Project due to the all-electric design and additional code efficiencies within the different CalEEMod versions.

Table 3
Summary of Operational Energy Use

	SCEA Project	Revised Project	Change
Electricity	2,345,318 kWh/year	2,132,431 kWh/year	-212,887 kWh/year
Natural Gas	4,142,472 cf/year	474,455 cf/year	-3,668,017 cf/year
Transportation	199,398 gallons/year	199,398 gallons/year	No change
SCEA Project: CalEEMod 2020.4.0 Revised Project: CalEEMod 2022.1.1.14. Water delivery assumed to be reduced for the commercial reduction (from 7,500 sf to 5,260 sf), a 30% percent reduction, which is equivalent to a 4,500 gallon reduction. All other portions remain the same. VMT from Gibson Transportation Consulting, June 2022. Note that the Revised Project has the same number of units as the SCEA Project. Furthermore, the commercial uses would continue to be less than 50,000 sf and, therefore, would be considered local-serving ... and no further analysis would be required.			

4.7 Geology and Soils

The SCEA concluded that less than significant impacts to geology and soils and paleontological resources would occur with implementation of mitigation measures.

Regarding geology and soils, the geotechnical consultant reviewed the plans for the Revised Project and has confirmed that all prior geological assessments and geotechnical recommendations remain applicable for the updated layout of the Revised Project. This review is included as **Appendix F** to this Memo. The Revised Project does not affect the SCEA discussion or conclusions since the overall building footprint remains approximately the same on the Site, and shifting the tower south and reducing its height do not affect the geologic feasibility of the Project. There are no new impacts and no new mitigation measures are required.

Regarding paleontological resources, Mitigation Measure MM-GEO-1 would ensure that potential impacts related to inadvertent discovery of unknown paleontological resources would be less than significant. The paleontological impact conclusion does not change since excavation would still be necessary at the Site in connection with the Revised Project. There are no new impacts and no new mitigation measures are required.

4.8 Greenhouse Gas Emissions

The SCEA concluded that less than significant impacts to GHG would occur. The Revised Project, like the SCEA Project, would continue to be consistent with the AB 32 Scoping Plan and First Update, the 2017 Scoping Plan, SCAG's 2020-2045 RTP/SCS, and the City's Mobility Plan 2035, Green New Deal, and latest green building codes.

Since the publication of the SCEA, CARB has adopted its 2022 Scoping Plan for GHG. The revised GHG report and technical modeling is included as **Appendix B** to this Memo, as well as a consistency analysis addressing the goals and policies of the 2022 Scoping Plan. As shown by that analysis, the Revised Project would not conflict with applicable strategies related to the 2022 Scoping Plan's transportation electrification, VMT reduction, and building decarbonization priority areas, and would therefore be supportive of the City's achievement of the 2022 Scoping Plan's strategies for GHG reduction in the key priority areas.

Operational GHG emissions for the Revised Project were also estimated using CalEEMod version 2022.1.1.14, the results of which are shown in **Appendix B**. The Revised Project's total GHG emissions are lower than those that were estimated for the SCEA Project, but again they are more the product of changes in modeling assumptions and methodologies between CalEEMod version 2020.4.0 and CalEEMod version 2022.1.1.14 than they are the product of differences between the two project proposals, which are relatively minor. There are no new impacts and no new mitigation measures are required.

4.9 Hazards and Hazardous Materials

The SCEA concluded that less than significant impacts to hazards and hazardous materials would occur with implementation of mitigation measures. The minor revisions proposed under the Revised Project do not affect the SCEA's discussion or conclusions since the building would be located and constructed on the same Site and contain the same uses, and the SCEA's mitigation measures would continue to apply. MM-HAZ-1, relating to a soil management plan (SMP), and MM-HAZ-2, relating to a potential dewatering treatment system at the Site, would continue to be implemented.

Regarding potential dewatering, the SCEA's Phase I ESA included as Appendix F references a prior geotechnical report that contemplated operational dewatering in connection with the potential development of multiple subterranean parking levels. However, the project-specific geotechnical report prepared for the SCEA Project (included as **Appendix F**) instead recommends hydrostatic resistance for the Project's proposed single subterranean parking level; as a result, potential dewatering and the implementation of MM HAZ-2 is contemplated in connection with the construction phase, and not the operational phase, of both the SCEA Project and the Revised Project. The SCEA's hazards mitigation measures and associated Mitigation Monitoring Plan also require that the SMP and dewatering plan be made subject to regulatory review and approval prior to commencement of the Project's site grading and excavation activities; this contemplated timing for preparation of these plans is most protective against potential impacts, as the Project's specific grading and excavation plans and associated construction techniques must first be developed, and then the SMP and dewatering plan must be developed in consideration of those design decisions. Moreover, by requiring regulatory review and approval to occur immediately prior to the implementation of either the SMP or dewatering plan, the mitigation measures ensure that the most current and up-to-date regulatory requirements are being complied with. Accordingly, the SCEA's mitigation measures continue to ensure that no hazards or hazardous materials impacts will occur. There are no new impacts and no new mitigation measures are required.

4.10 Hydrology and Water Quality

The SCEA concluded that less than significant impacts to hydrology and water quality would occur. The Revised Project does not affect the SCEA's discussion or conclusions since the overall building footprint remains substantively the same, the same uses are proposed, and the proposed shifting of the tower south and the reduction in height do not affect the hydrological characteristics of the Project. There are no new impacts and no new mitigation measures are required.

4.11 Land Use and Planning

The SCEA concluded that less than significant impacts to land use and planning would occur. The Revised Project does not affect the SCEA's discussion or conclusions since the same uses within a similar building would continue to be located on the same Site. The Revised Project would also continue to be consistent with SCAG's 2020-2045 RTP/SCS, City General Plan, and Wilshire Community Plan, pursuant to the consistency analysis contained in the SCEA. There are no new impacts and no new mitigation measures are required.

4.12 Mineral Resources

The SCEA concluded that no impacts to mineral resources would occur. The Revised Project does not affect the SCEA discussion or conclusions, as it would continue to be located on the same Site where no mineral resources are located. There are no new impacts and no new mitigation measures are required.

4.13 Noise

The SCEA concluded that less than significant impacts to noise would occur with implementation of mitigation measures during the Project's construction phase. No impacts would occur during operations, and no operational mitigation was required.

To ensure that the Project's construction-related noise increases at sensitive receptors do not exceed the 5 dBA Leq threshold of significance for daytime construction activities lasting more than 10 days in a three-month period, Mitigation Measures MM-NOI-1 through MM-NOI-7 are required. The minor design changes proposed under the Revised Project were analyzed in an updated noise technical memorandum, included as **Appendix G** to this Memo. As set forth in this attached noise analysis, taking into consideration the minor design changes proposed by the Revised Project, the implementation of Mitigation Measures MM-NOI-1 through MM-NOI-7 would continue to mitigate construction noise levels during the most noise-intensive construction phases (i.e., bulk excavation, as well as either auger-case pile installation or deep soil mixing column installation, both of which were assessed to provide a conservative analysis). In addition, as described in the attached noise analysis, the construction activities occurring during other phases of Project construction would be substantially quieter than the excavation/pile or column installation phases; accordingly, the same proposed mitigation measures that will reduce the Project's highest construction noise levels to less than significant levels would also ensure that no significant noise impacts would occur during the Project's quieter construction phases. There are no new impacts and no new mitigation measures are required regarding construction-phase noise.

As set forth in the SCEA, Mitigation Measures MM-NOI-8 through MM-NOI-10 would reduce the groundborne vibration levels during the Project's most vibration-intensive construction phases to below the relevant significance thresholds, and impacts would be less than significant. As analyzed in the updated noise technical memorandum included as **Appendix G** to this Memo, the Revised Project would either

result in similar levels of construction-related vibration, or reduced construction-related vibration in relation to the sensitive receptors to the east, where the Revised Project will provide a greater setback distance than the SCEA Project. Moreover, as described in the SCEA, the mitigation measures to be implemented include performing a pre-construction survey and implementing a vibration monitoring system prior to issuance of grading permits. By requiring these actions prior to the commencement of grading and excavation activities, the pre-construction survey will conservatively reflect then-current building conditions, and the vibration monitoring plan will account for the specific Project construction techniques to be utilized, thereby offering the most protective measures to ensure effective mitigation. Accordingly, the SCEA's vibration-related mitigation measures would continue to reduce potential vibration impacts to a less than significant level. There are no new impacts and no new mitigation measures.

4.14 Population and Housing

The SCEA concluded that less than significant impacts to population and housing would occur. The Revised Project does not affect the SCEA discussion or conclusions as the same number of new residential units is being proposed. There are no new impacts and no new mitigation measures are required.

4.15 Public Services

The SCEA concluded that less than significant impacts to public services would occur. The Revised Project does not affect the SCEA discussion or conclusions because the same number of new residential units is being proposed, resulting in the same new incremental demand for public services. There are no new impacts and no new mitigation measures are required.

4.16 Recreation

The SCEA concluded that less than significant impacts to recreation would occur. The Revised Project does not affect the SCEA discussion or conclusions because the same number of new residential units is being proposed, resulting in the same new incremental demand for recreational facilities. There are no new impacts and no new mitigation measures are required.

4.17 Transportation

The SCEA concluded that less than significant impacts to transportation would occur. To account for the minor design changes associated with the Revised Project, a revised transportation assessment memorandum is included as **Appendix H** to this Memo. As analyzed in that memorandum, the Revised Project proposes a land use program similar to the SCEA Project, including the same residential density and a reduced commercial floor area. In addition, the Revised Project would continue to implement transportation demand management strategies as part of the Project design, including a reduced parking supply, unbundled parking, and bicycle parking in accordance with the LAMC. As such, the Revised Project's household VMT per capita would be consistent with the SCEA Project's City-approved transportation assessment. Furthermore, the commercial uses would continue to be less than 50,000 sf and, therefore, would be considered local-serving and the impact would be considered less than significant.

The two driveways proposed on La Cienega Boulevard would remain to provide access to the parking levels. However, the northern driveway would shift slightly south and the southern driveway would shift slightly north. As concluded by the revised transportation assessment memorandum, the revised driveways would continue to meet City requirements, , and would continue to provide adequate sight distance, as La Cienega Boulevard has no curvatures and is relatively level adjacent to the Project Site. Furthermore, the

Revised Project would maintain the two-way left-turn median along La Cienega Boulevard, which would facilitate safer left-turn ingress and egress to the Project Site. Consistent with the approved transportation assessment, the Revised Project would not increase the number of curb cuts along the Project frontage. Bicycle and pedestrian access to the Project Site would continue to be provided separately from the vehicular driveways via retail and residential entrances along La Cienega Boulevard. Accordingly, the Revised Project does not affect the SCEA discussion or conclusions regarding operational transportation impacts. There are no new impacts and no new mitigation measures are required.

During construction, the Project would include a Construction Traffic Management Plan (pursuant to PDF-TRANS-1), which would ensure that adequate emergency access exists during construction. This would also apply to the Revised Project, and would be an enforceable condition of approval that must be satisfied before permits can be issued. The required timing for the preparation of the Construction Traffic Management Plan is appropriate and most protective against potential construction-related effects upon vehicular, bicycle, and pedestrian traffic, as the Project's specific construction details as well as then-current traffic conditions (e.g., street repair work or other potential construction activities in proximity to the Site) would be disclosed to the City so that the most effective and protective measures can be implemented for the Project. Accordingly, the Revised Project does not affect the SCEA discussion or conclusions regarding construction period transportation impacts. There are no new impacts and no new mitigation measures are required.

4.18 Tribal Cultural Resources

The SCEA concluded that less than significant impacts to tribal cultural resources would occur, with implementation of the City's standard condition of approval for the inadvertent discovery of tribal cultural resources. The Revised Project would require similar excavation at the same site, and would also be subject to the City's standard condition of approval. The Revised Project does not affect the SCEA discussion or conclusions. There are no new impacts and no new mitigation measures are required.

4.19 Utilities and Service Systems

The SCEA concluded that less than significant impacts to utilities and service systems would occur. The Revised Project does not affect the SCEA discussion or conclusions because the number of residential units remains the same and the retail space is slightly reduced, which would slightly reduce utility demand. There are no new impacts and no new mitigation measures are required.

4.20 Wildfire

The SCEA concluded that no impacts to wildfire would occur. The Revised Project does not affect the SCEA discussion or conclusions because it would be located on the same Site that is not subject to any wildfire hazards. There are no new impacts and no new mitigation measures are required.

5 Cumulative Changes

As described in the SCEA, a one-half mile radius was used to identify related projects that could potentially combine with the Project to result in cumulative impacts. This one-half mile radius is derived from LADOT's guidance for consideration of related projects for traffic assessment purposes, and is conservative in nature, as apart from traffic, no other cumulative impact analysis would be affected by a project located one-half mile or more from the Project site. The following listing of environmental topics where a potential exists for Project impacts to occur demonstrates this:

- Air quality (local emissions): no related project located more than one-half mile away would be able to contribute local emissions to any of the same sensitive receptors as the Project.
- Cultural resources: as described in the SCEA, none of the related projects within one-half mile are located within the Historic District; any related project located further away than one-half mile would similarly have no impact upon the Historic District.
- Geology: no related project located more than one-half mile away could contribute to a potential cumulative impact regarding geology and soils.
- Hazards: hazards-related impacts are site-specific, or may involve immediately proximate properties. Related projects located more than one-half mile away could not contribute to a cumulative hazards impact.
- Noise: noise levels attenuate rapidly, and vibration levels even more so. No related project located more than one-half mile away could contribute either noise or vibration levels to any of the same sensitive receptors as the Project.
- Public Services/Utilities: Again, no related project located more than one-half mile away would be able to contribute to potential cumulatively considerable impacts along with the Project.

Since publication of the SCEA, one new proposed development within a one-half mile radius has been identified: a new project at 6527 Wilshire, located 2,400 feet northeast of the Site. However, given the distance between this project and the Site, the presence of intervening buildings, and lack of shared street usage, there is no potential for this new project to combine with the Project to produce cumulatively considerable impacts. The Revised Project does not affect the SCEA discussion or conclusions and there are no new impacts and no new mitigation measures.

6 Conclusion

The information contained in this Memorandum and the attached technical appendices merely clarifies, amplifies, or makes insignificant changes to the information that has already been presented in the SCEA. These updates include Project-related information, but as explained above and in the attached analyses, do not affect the SCEA's impact conclusions or mitigation requirements.

The modifications are not significant because the SCEA is not being changed in a way that deprives the public of a meaningful opportunity to comment upon a new substantial adverse environmental effect of the Project or an increase in the severity of a previously identified significant impact. Nor do these changes add significant new information that would affect the analysis or conclusions presented in the SCEA.

As set forth in the SCEA, in compliance with Public Resources Code Section 21155.2(b), an initial study was prepared to identify all significant or potentially significant impacts of the Project. The SCEA contains measures that either avoid or mitigate to a level of insignificance all potentially significant or significant effects of the Project required to be identified in the initial study. These measures include all feasible mitigation measures, performance standards, or criteria set forth in the prior applicable environmental impact reports, or measures determined by the City to be equal to or more effective than prior mitigation measures. The SCEA contains a detailed assessment of the mitigation measures included in SCAG's 2020-2045 RTP/SCS Program EIR Mitigation Monitoring and Reporting Program and corresponding determinations as to whether those mitigation measures will be incorporated into the Project. In addition,

as set forth in the matrix included as **Appendix I** to this Memo, other mitigation measures contained in other City EIRs have been assessed for their potential applicability to the Project, and it has been determined that these measures need not be incorporated into the Project due to fact that the SCEA's existing measures are equal to or more effective than the mitigation measures contained in these prior City EIRs.

As demonstrated above the Revised Project does not propose any changes or affect the SCEA analysis in a way that would warrant a subsequent analysis under CEQA Guidelines Section 15162:

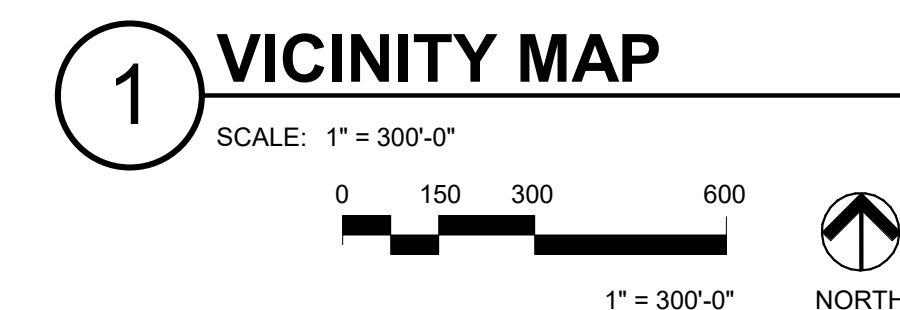
- The Revised Project does not propose substantial changes which will require major revisions of the previous analysis due to involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects. The Revised Project would be substantially similar to the SCEA Project, with some minor shifting of floor area, and shifting the tower element to the south and reducing its height. None of these changes creates a new impact and there are no significant impacts.
- There are no substantial changes under which the Project is undertaken that require major revisions of the previous analysis due to involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
- There is no new information of substantial importance, which was not known and could not have been known, that shows the Project would have one or more significant effects not discussed previously or that significant effects previously examined will be substantially more severe.
- No mitigation measures previously found not to be feasible would be feasible and would substantially reduce one or more significant effects and none are different for applicability to the Revised Project. The SCEA identified mitigation measures for cultural resources (archaeological resources), geology and soils (paleontological resources), hazards and hazardous materials (soils management plan and dewatering), and noise and vibration. Each of these would be feasible and remain applicable to the Revised Project.

Accordingly, as analyzed in the SCEA, the whole of the record supports the conclusion that the Project would result in impacts below a level of significance. Thus, none of the conditions in CEQA Guidelines Section 15162 are met, and recirculation is not required.



1050 LA CIENEGA BOULEVARD

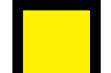





TOC REFERRAL SET
AUGUST 16, 2022



DRAWING INDEX

SHEET NUMBER	SHEET DESCRIPTION
GENERAL	
A0.00	COVER SHEET / DRAWING INDEX / VICINITY MAP
A0.01	SITE DATA
A0.02A	AREA ANALYSIS - PROGRAM AREA
A0.02B	FAR CALC DIAGRAMS
A0.02C	OPEN SPACE DIAGRAMS
A0.02D	BICYCLE PARKING INFORMATION
A0.03	PLOT PLAN
A0.04	EXISTING SITE PHOTOS
A0.05	EXTERIOR RENDERINGS
A0.06	EXTERIOR RENDERINGS
A0.07	EXTERIOR RENDERINGS
CIVIL	
C0.01	ALTA SURVEY (FOR REFERENCE ONLY)
C0.02	ALTA SURVEY (FOR REFERENCE ONLY)
C0.03	ALTA SURVEY (FOR REFERENCE ONLY)
C0.04	ALTA SURVEY (FOR REFERENCE ONLY)
C1.01	TOPOGRAPHIC SURVEY
C1.02	TOPOGRAPHIC SURVEY
C2.01	BACK OF WALK EXHIBIT
C3.01	EXCAVATION PLAN
C4.01	CONCEPTUAL UTILITY PLAN
ARCHITECTURAL	
A1.01	SITE PLAN
A2.00	LEVEL B1 FLOOR PLAN
A2.01	LEVEL 01 FLOOR PLAN
A2.02	LEVEL 02 FLOOR PLAN
A2.03	LEVEL 03 FLOOR PLAN
A2.04	LEVELS 04-11 FLOOR PLAN
A2.12	LEVELS 12-22 FLOOR PLAN
A2.23	LEVEL 23 FLOOR PLAN
A2.24	LEVEL 24 - SKYDECK FLOOR PLAN
A2.25	ROOF LEVEL FLOOR PLAN
A3.01	BUILDING ELEVATIONS
A3.02	BUILDING ELEVATIONS
A3.03	BUILDING ELEVATIONS
A3.04	BUILDING SECTIONS
A3.05	BUILDING SECTIONS
LANDSCAPE	
L1.01	LEVEL 01 - LANDSCAPE PLAN
L1.03	LEVEL 03 - LANDSCAPE PLAN
L1.24	LEVEL 24 - LANDSCAPE PLAN

NOTE:
TREE SURVEY NOT PROVIDED. THERE ARE NO EXISTING TREES ON SITE.
DEMOLITION PLAN NOT PROVIDED. SITE IS VACANT.

-  PROJECT SITE - 1050 LA CIENEGA
-  METRO BUS STOP - RTE. 105 CIENEGA/
-  FUTURE METRO RAIL STATION - WILSHIRE / LA CIENEGA
-  METRO BUS ROUTE 105 NORTHBOUND
-  METRO BUS ROUTE 105 SOUTHBOUND
-  METRO RAIL D (PURPLE) LINE EXTENSION



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NO.	DATE	DESCRIPTION

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LOS ANGELES, CA 90035

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**COVER SHEET /
DRAWING INDEX /
VICINITY MAP**

Project Number: 2021034

Sheet Number: **A0.00**

PROJECT DESCRIPTION

- NEW CONSTRUCTION OF 290 UNITS, 24 STORIES MULTI-FAMILY RESIDENTIAL AND MIXED USE RETAIL DEVELOPMENT
- 24 LEVELS OF TYPE IA CONSTRUCTION ABOVE GRADE AND 1 LEVEL OF TYPE IA SUBTERRANEAN CONSTRUCTION
- PROJECT TO BE CONSTRUCTED IN ONE PHASE
- USE: R-2 RESIDENTIAL, C-2 RETAIL
- BASE ZONING: C2-1-O

1050 LA CIENEGA

Residential	Residential	STUDIO	U1B BOTTOM	U1B TOP	1B BOTTOM	1B TOP	U1B+DEN	U2B	2B	2B TOP	2B PH	Unit Count	NSF	GSF	Open Space	Small	Parking Loading BOM	Regular	Tandem	Total	GSF	Bike	GSF	GSF
Total	Amenity NSF	446	682	623	765	751	801	946	1,150	1,131	1,693	290	255,917	324,632	62,289	4,035	412	0	412	189,420	1,643	297,880	512,272	

LOT SIZE
MULTIPLIER
MAX FAR

79,423
1.75
298,586

OPEN SPACE REQUIRED

SEC. 12.21 G m/codes/los_angeles/latest/app/0-0-0-5183

Open Space Category	<3 Hb Rms	3 Hb Rms	>3 Hb Rms	Total
REQUIRED	160	125	175	460

UNIT TYPE	Studio & 1B	2B	3B	Total
TOTAL HABITABLE ROOMS	174	182	8	364
OPEN SPACE REQUIRED	17,400	22,750	1,400	41,550

OPEN SPACE PROVIDED

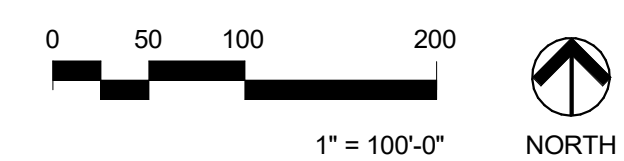
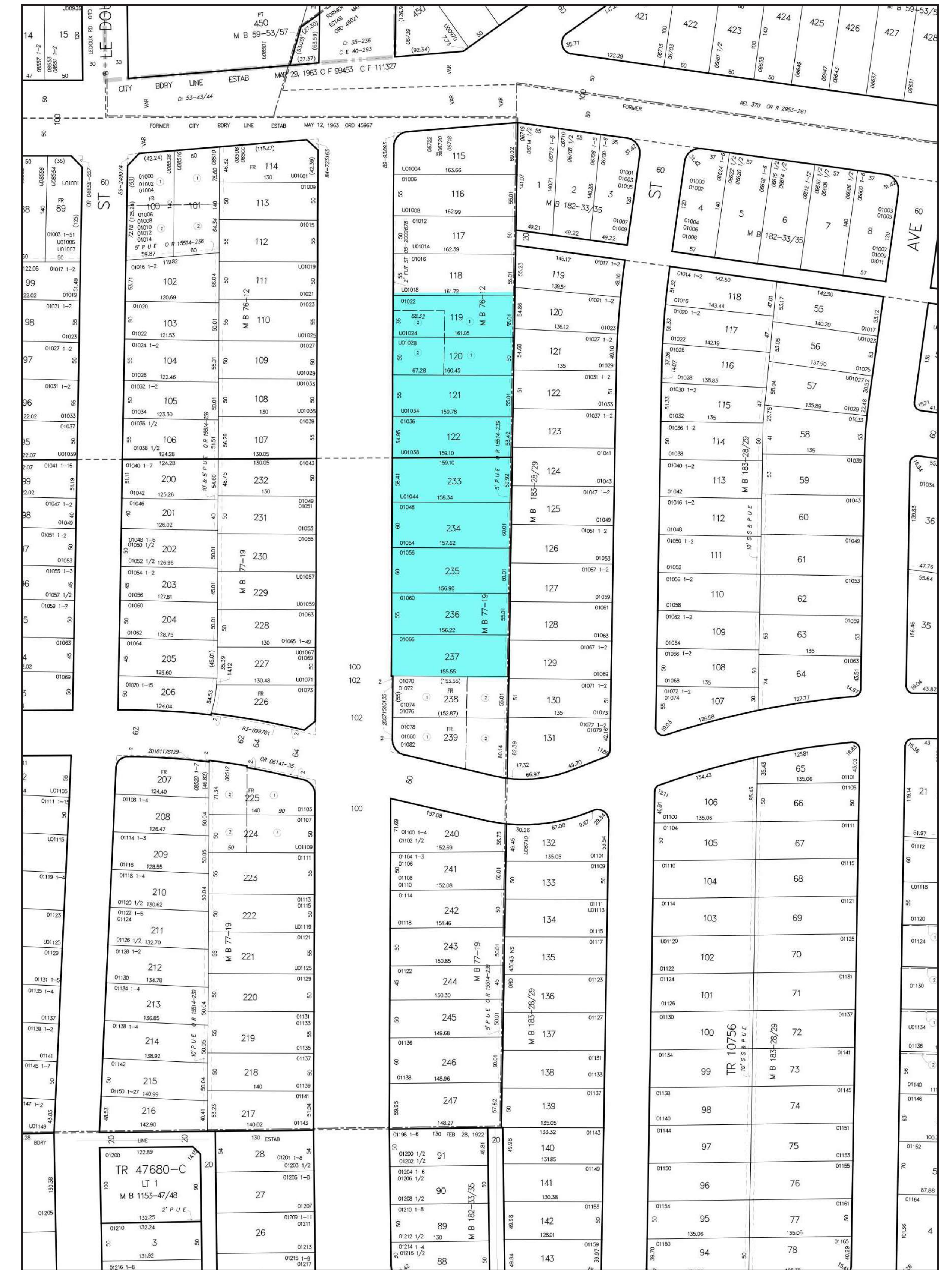
Open Space Category	DECKS	AMENITIES	BALCONIES	Total
PROVIDED	32,129	10,388	9,000	51,517

51,517 > 41,550

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

FLOOR AREA. The area in square feet confined within the exterior walls of a Building, but not including the area of the following: exterior walls, stairways, shafts, rooms housing Building-operating equipment or machinery, parking areas with associated driveways and ramps, space dedicated to bicycle parking, space for the landing and storage of helicopters, and basement storage areas.

TOC TIER 3 INCENTIVES	
BASE INCENTIVES	
DENSITY	70% Increase allowed (45% utilized)
FAR	3.75 to 1 allowed (3.75 to 1 utilized)
PARKING	0.5 stall per dwelling unit allowed (1.42 utilized)
ADDED INCENTIVES	
SIDE YARD SETBACK	5' Minimum per RAS3 zone (5' utilized)



PERCENTAGE MIX BY UNIT TYPE	Studio	U1B BOTTOM	U1B TOP	1B BOTTOM	1B TOP	U1B+DEN	U2B	2B	2B TOP	2B PH
PERCENTAGE MIX BY UNIT TYPE	5.5%	11.0%	7.6%	16.6%	15.2%	3.8%	3.8%	11.0%	22.8%	2.8%

SITE SUMMARY

SITE	ALLOWABLE	PROVIDED
LOT AREA		79,623 SF (1.83 ACRES)
DEDICATION AREA - LA CIENEGA	0	0
SETBACK AREA (INCLUDED IN LOT AREA)	0	0
DWELLING UNITS (BASE ZONING)	200 units (@ 400 SF/unit)	290 units
DWELLING UNITS WITH TOC TIER 3	340 units (@ 70% increase)	
FAR (BASE ZONING)	119,435 SF (@ 1.5 : 1)	
FAR WITH TOC TIER 3	298,586 SF (@ 3.75 : 1)	297,680 (@ 3.75 : 1)
RESIDENTIAL FLOOR AREA		292,420 SF
COMMERCIAL FLOOR AREA		5,260 SF
BUILDING HEIGHT	NO LIMIT	271'-10"
SETBACKS		
FRONT YARD	ALLOWABLE 0' PER C2 ZONE	PROVIDED
SIDE YARD	0' FOR COMMERCIAL USES (GROUND FLOOR), 5' FOR RESIDENTIAL (LEVELS 2-24)	0' FOR COMMERCIAL USES (GROUND FLOOR), 5' FOR RESIDENTIAL (LEVELS 1-3) AND 25'-11" FOR RESIDENTIAL (LEVELS 4-24) ON SOUTH SIDE WITH TOC INCENTIVE
REAR YARD	0' FOR COMMERCIAL USES, 20' FOR RESIDENTIAL (LEVELS 2-24)	0' FOR COMMERCIAL USES (GROUND FLOOR), 28'-6" FOR RESIDENTIAL (LEVELS 2-24) WITH TOC INCENTIVE

TOC TIER 3

PARKING	REQUIREMENT	PROVIDED
RESIDENTIAL PARKING	0.5 SPACE PER UNIT (TOC TIER 3): 0.5 X 290 + 145 SPACES	384 SPACES
COMMERCIAL PARKING	1 SPACE PER 100 SF TOC TIER 30% REDUCTION THEN APPLIED: 39 (1 PER 100 SF) - 11 (30%) = 28 SPACES	28 SPACES
PROVIDED PARKING DETAILS		
LEVEL 3 PARKING	STANDARD: 59, COMPACT: 0, ACCESSIBLE: 0, USPS: 0	TOTAL: 59
LEVEL 2 PARKING	STANDARD: 95, COMPACT: 13, ACCESSIBLE: 4, USPS: 0	TOTAL: 112
LEVEL 1 PARKING	STANDARD: 78, COMPACT: 8, ACCESSIBLE: 4, USPS: 1	TOTAL: 92
BI PARKING	STANDARD: 132, COMPACT: 16, ACCESSIBLE: 1, USPS: 0	TOTAL: 149
TOTAL: 412		
LOS ANGELES MUNICIPAL CODE Table 12.21 A.16(a)(1)(ii)		
BICYCLE PARKING (RESIDENTIAL)		
SHORT-TERM	15 SPACES REQUIRED	16
LONG-TERM	147 SPACES REQUIRED	160
BICYCLE PARKING (COMMERCIAL)		
SHORT-TERM	6 SPACES REQUIRED	4
LONG-TERM	1 SPACE FOR 2000SF = 3 SPACES	164



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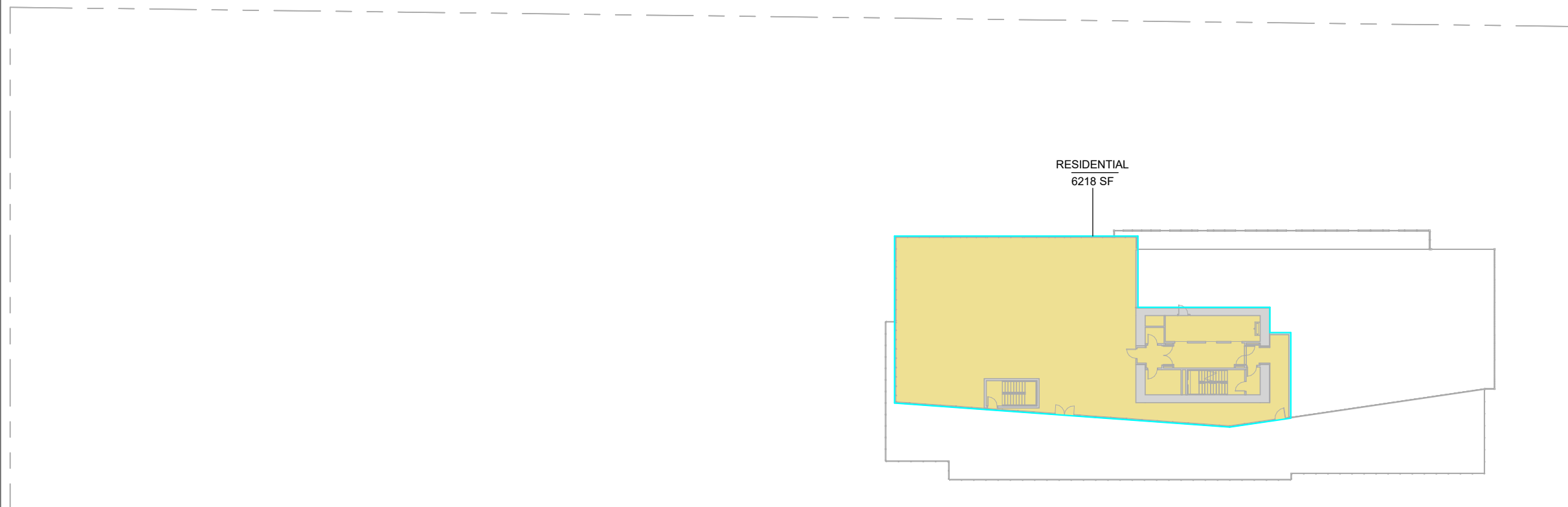
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SITE DATA

Project Number: 2021034

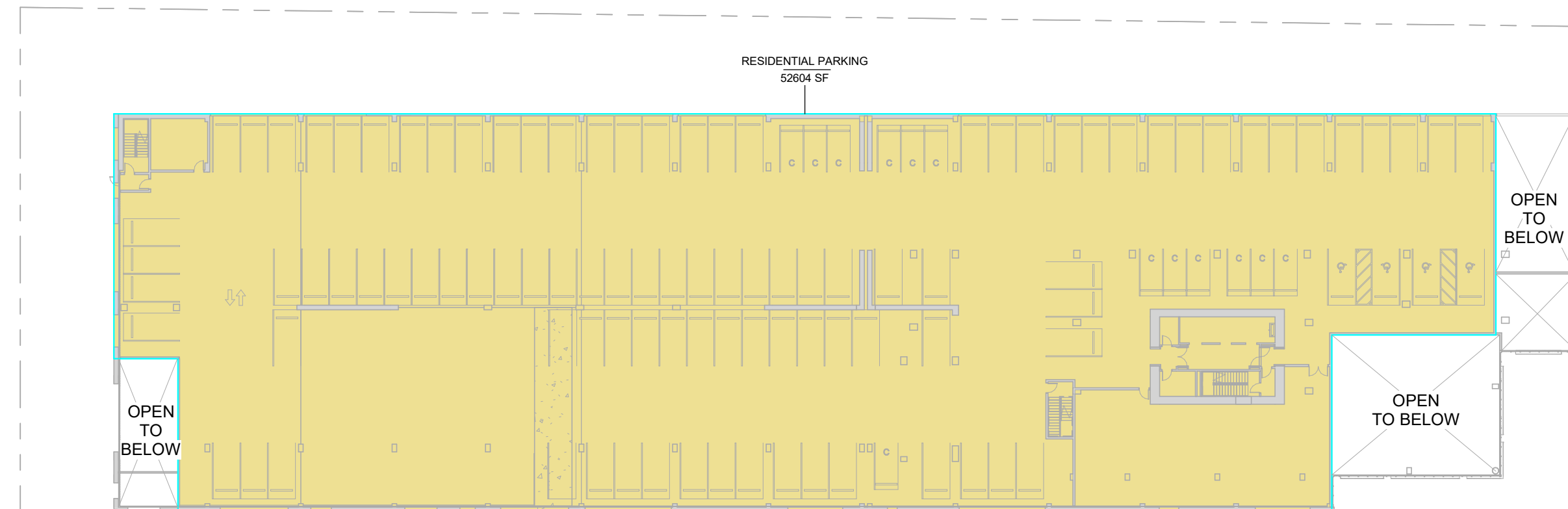
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NO.	DATE	DESCRIPTION



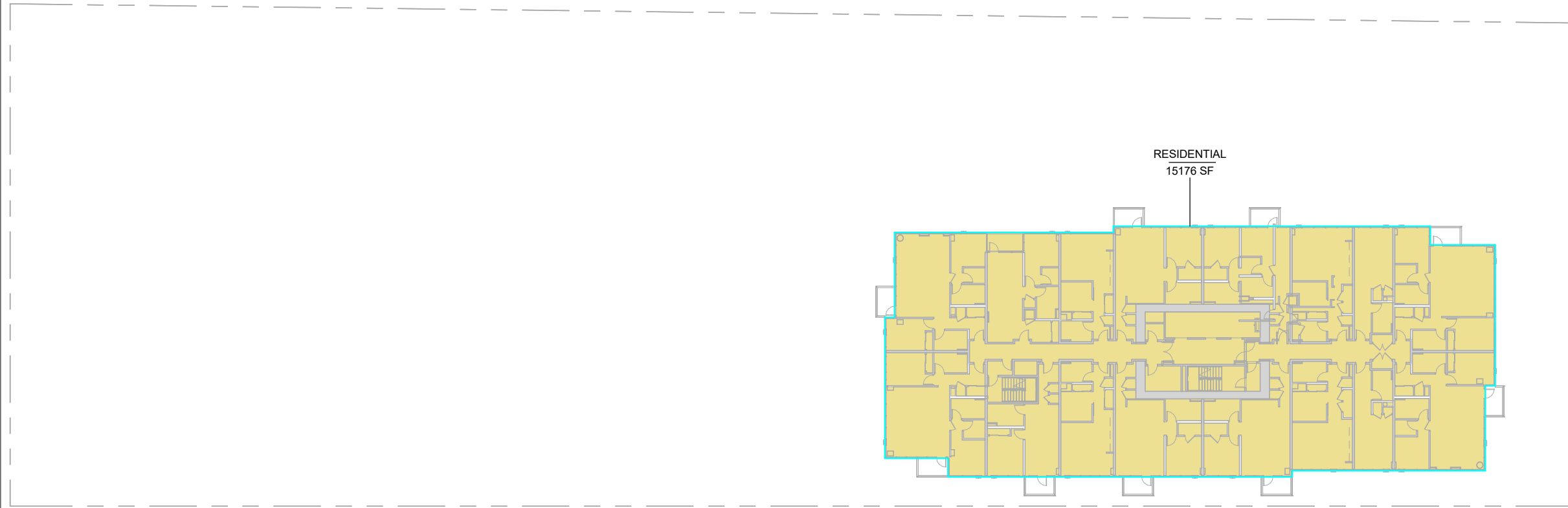
6 BUILDING AREA - LEVEL 24 SKYDECK

SCALE: 1" = 40'-0"



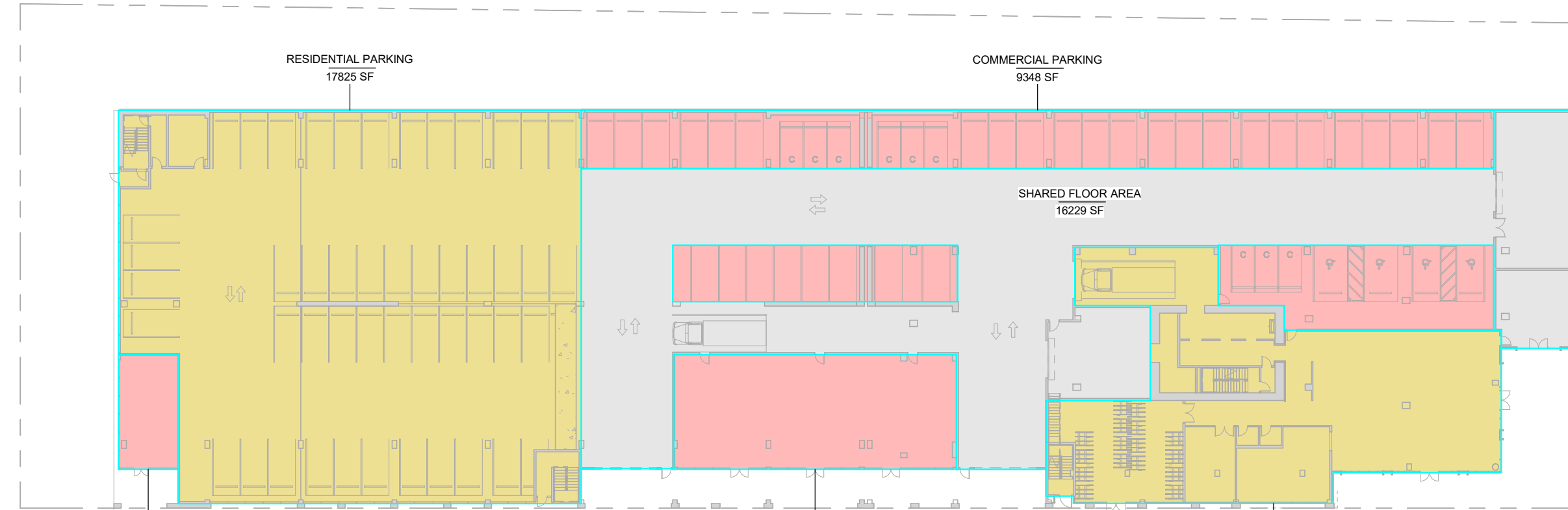
3 BUILDING AREA - LEVEL 02

SCALE: 1" = 40'-0"



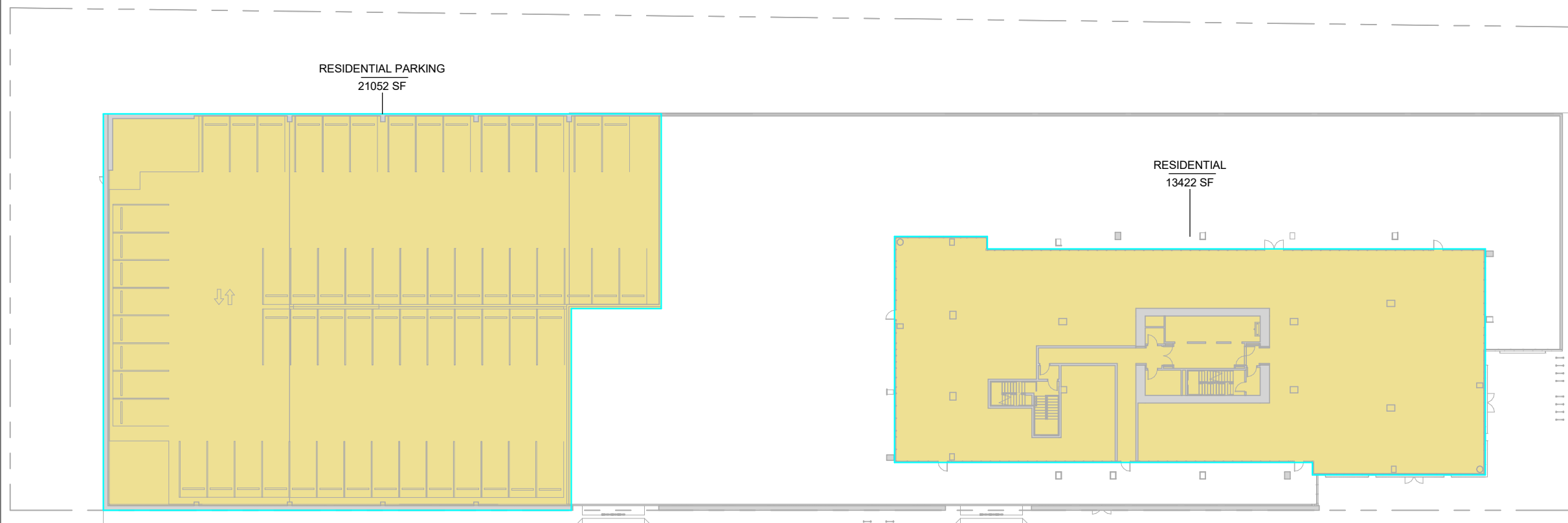
5 BUILDING AREA - LEVELS 04-23

SCALE: 1" = 40'-0"



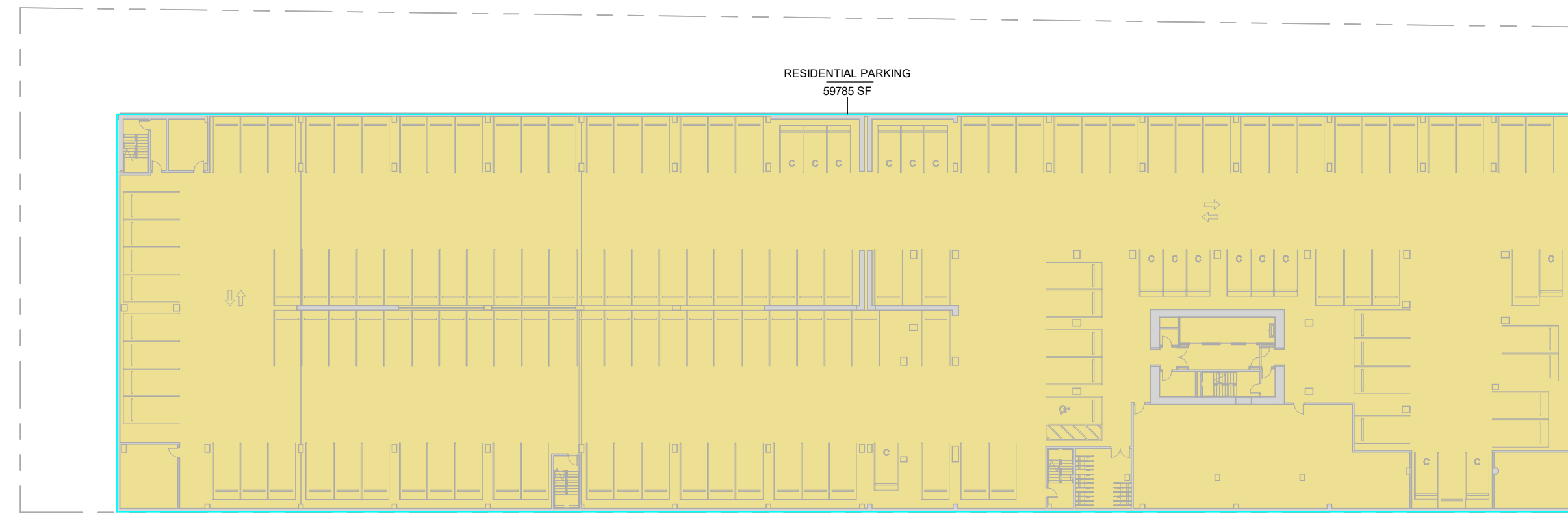
2 BUILDING AREA - LEVEL 01

SCALE: 1" = 40'-0"



4 LEVEL 03 - FLOOR AREA

SCALE: 1" = 40'-0"



1 BUILDING AREA - LEVEL B1

SCALE: 1" = 40'-0"

Building Area Analysis: Calculation Table			
Floor Area (non-parking)			
	Residential Floor Area	Non-residential Floor Area	Total
Level 01	8,005	4035	12,040
Level 03	13,422	0	13,422
Level 04	15,176	0	15,176
Level 05	15,176	0	15,176
Level 06	15,176	0	15,176
Level 07	15,176	0	15,176
Level 08	15,176	0	15,176
Level 09	15,176	0	15,176
Level 10	15,176	0	15,176
Level 11	15,176	0	15,176
Level 12	15,176	0	15,176
Level 13	15,176	0	15,176
Level 14	15,176	0	15,176
Level 15	15,176	0	15,176
Level 16	15,176	0	15,176
Level 17	15,176	0	15,176
Level 18	15,176	0	15,176
Level 19	15,176	0	15,176
Level 20	15,176	0	15,176
Level 21	15,176	0	15,176
Level 22	15,176	0	15,176
Level 23	15,176	0	15,176
Level 24	6,218	0	6,218
Totals	331,165	4035	335,200
Ratios	0.987962411	0	100%
Shared Floor Area (non-parking)			
	Residential Floor Area	Non-residential Floor Area	Total
Level 03	0	0	0
Level 04-23	0	0	0
Level 24	0	0	0
Total Shared	0	0	0
Ratios	0	0	0
Floor Area (parking)			
	Residential Floor Area	Non-residential Floor Area	Shared Floor Area
Level B1	59,785	0	0
Level 01	17,825	9,348	16,229
Level 02	52,604	0	0
Level 03	21,052	0	0
Totals	151,266	9348	16229
Parking Spaces using shared facilities			
	Residential Parking Spaces	Non-residential Parking Spaces	Total Parking Spaces
Total Qty	384	28	412
Ratios	0.93	0.07	
	384	28	
GRAND TOTALS			
	Residential Floor Area	Non-residential Floor Area	Grand Total
Total Qty	482,431	9348	491,779
Total Ratios	0.98	0.02	

LEGEND

- SHARED AREA
- COMMERCIAL AREA
- RESIDENTIAL AREA



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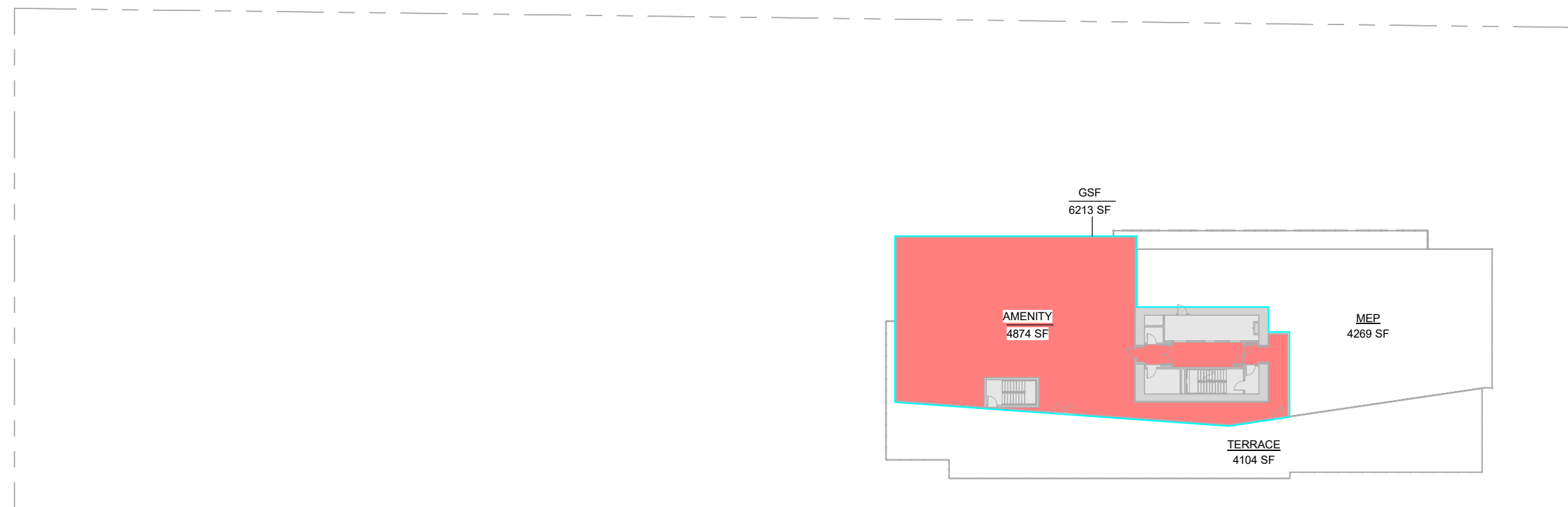
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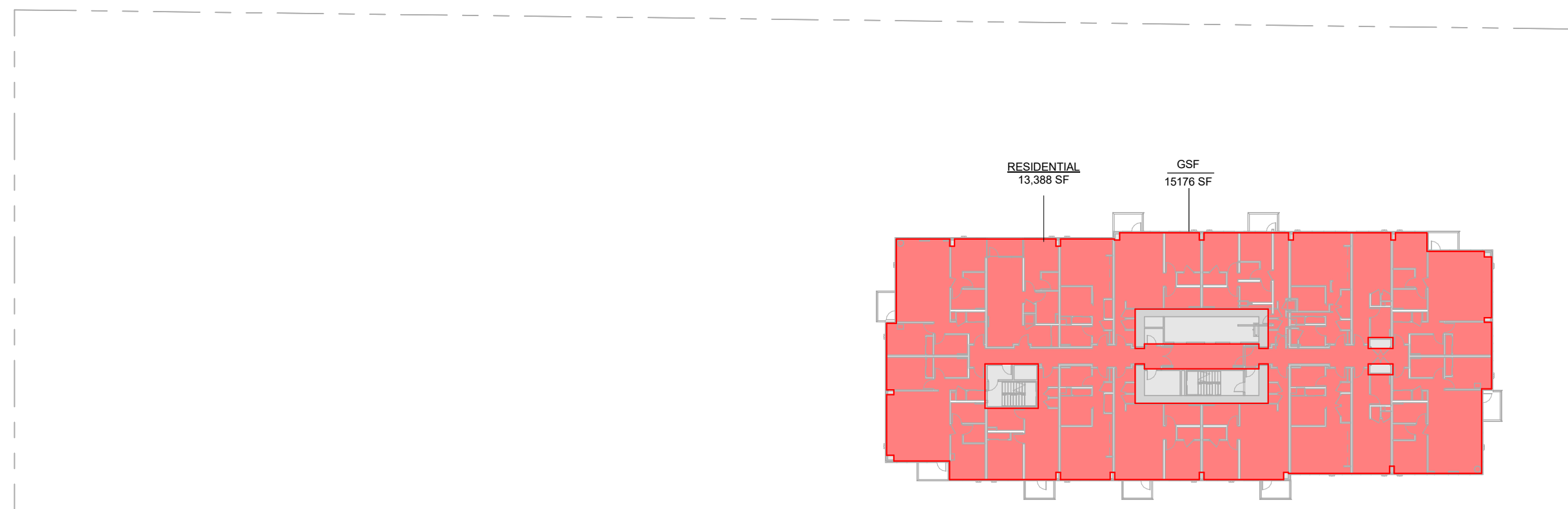
AREA ANALYSIS - PROGRAM AREA

Project Number: 2021034

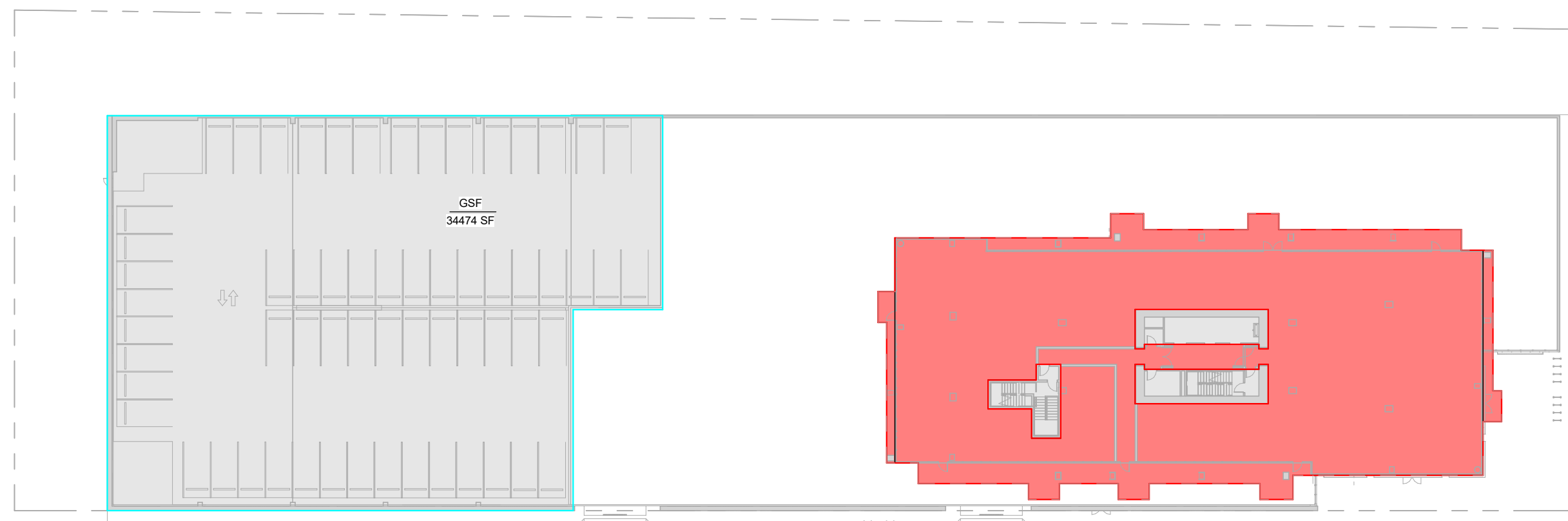
Sheet Number: **A0.02A**



6 LEVEL 24 - SKYDECK - FLOOR AREA
SCALE: 1" = 40'-0"



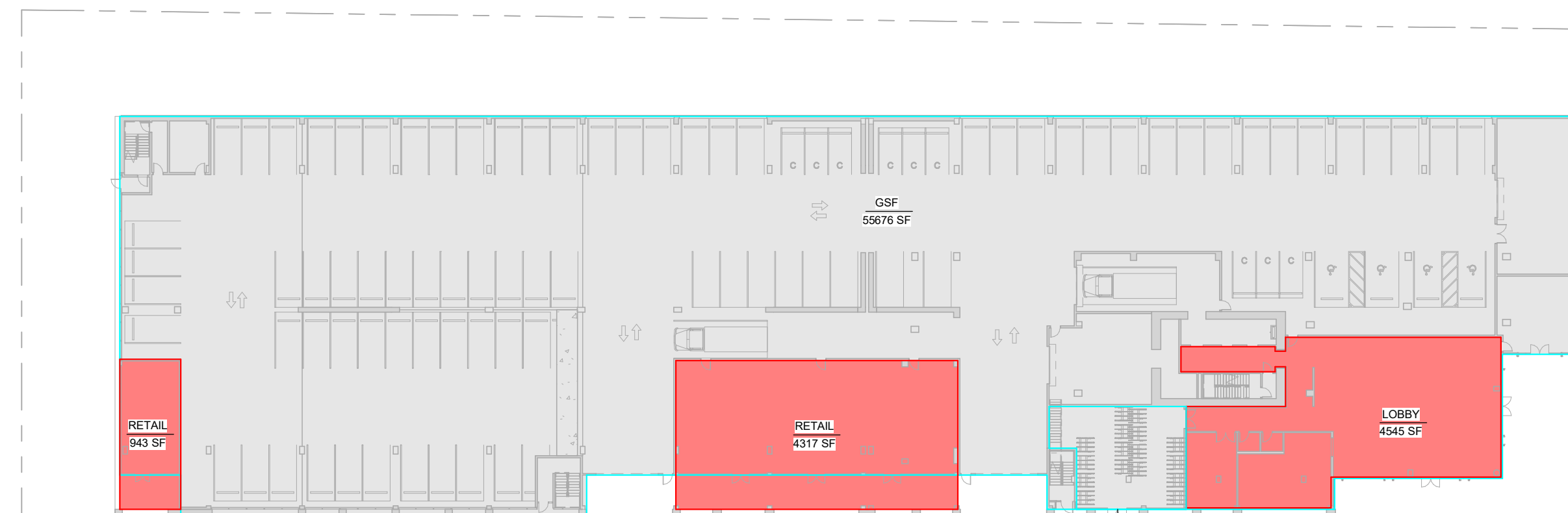
5 LEVELS 04 - 23 - FLOOR AREA
SCALE: 1" = 40'-0"



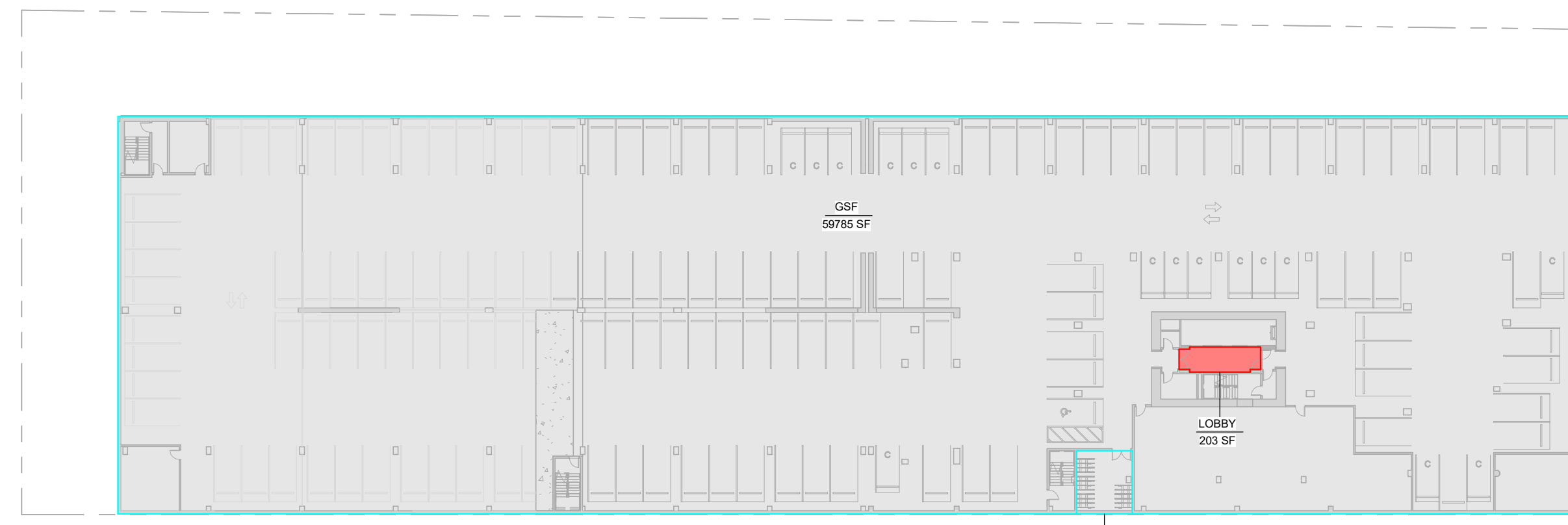
4 LEVEL 03 - FLOOR AREA
SCALE: 1" = 40'-0"



3 LEVEL 02 - FLOOR AREA
SCALE: 1" = 40'-0"



2 LEVEL 01 - FLOOR AREA
SCALE: 1" = 40'-0"



1 LEVEL B1 - FLOOR AREA
SCALE: 1" = 40'-0"

FLOOR AREA BY LEVEL

fir. Elev.	f/f Fir.	M,PH	FLOOR AREA	
			PER ZONING CODE	PER BUILDING CODE
			GSF	GSF
+270.83				
+251.83	19	RF		
+239.83	12	SKY	4,874	6,213
+227.17	12.67	23	13,502	15,176
+216.50	10.67	22	13,408	15,176
+205.83	10.67	21	13,408	15,176
+195.17	10.67	20	13,408	15,176
+184.50	10.67	19	13,408	15,176
+174.83	9.67	18	13,408	15,176
+165.17	9.67	17	13,408	15,176
+155.50	9.67	16	13,408	15,176
+145.83	9.67	15	13,408	15,176
+136.17	9.67	14	13,408	15,176
+126.50	9.67	13	13,408	15,176
+116.83	9.67	12	13,408	15,176
+107.17	9.67	11	13,388	15,176
+97.50	9.67	10	13,388	15,176
+87.83	9.67	09	13,388	15,176
+78.17	9.67	08	13,388	15,176
+68.50	9.67	07	13,388	15,176
+58.83	9.67	06	13,388	15,176
+49.17	9.67	05	13,388	15,176
+39.50	9.67	04	13,388	15,176
+25.50	14.00	03	14,492	34,474
+14.00	11.50	02	203	52,604
+0.00	14.00	01	9,814	55,676
+10.00	-12.00	B1	203	59,785
			297,680	512,272
			GSF	GSF

LEGEND



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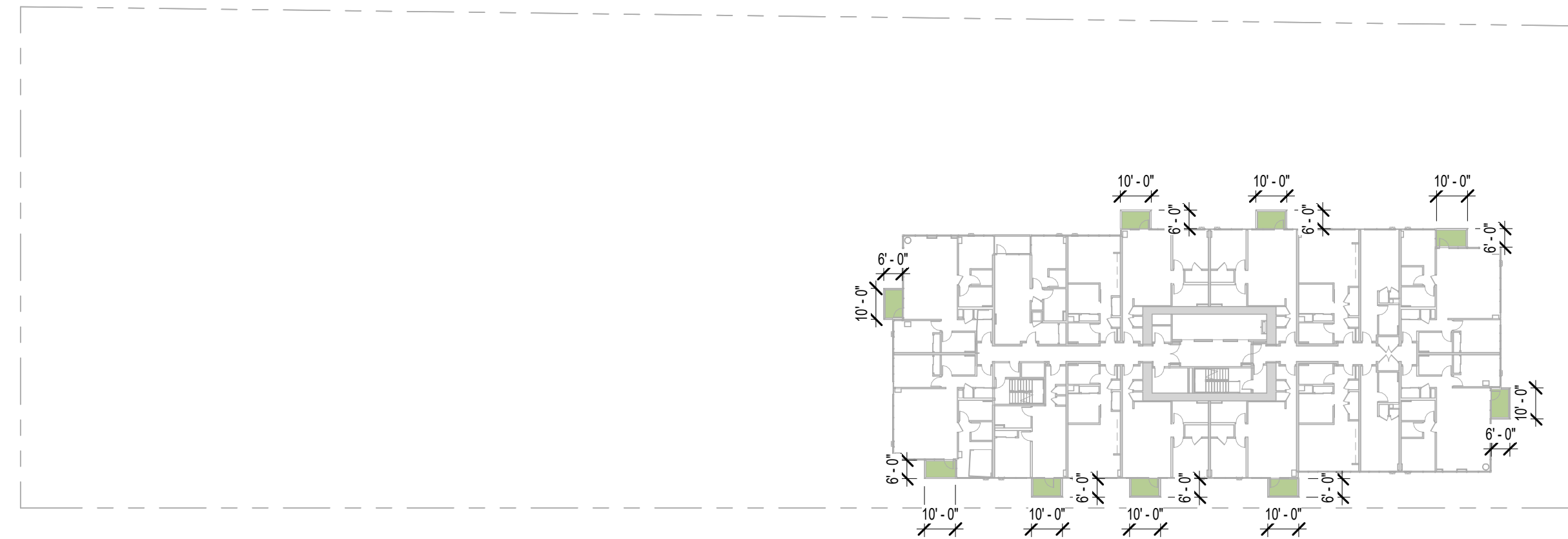
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**FAR CALC
DIAGRAMS**

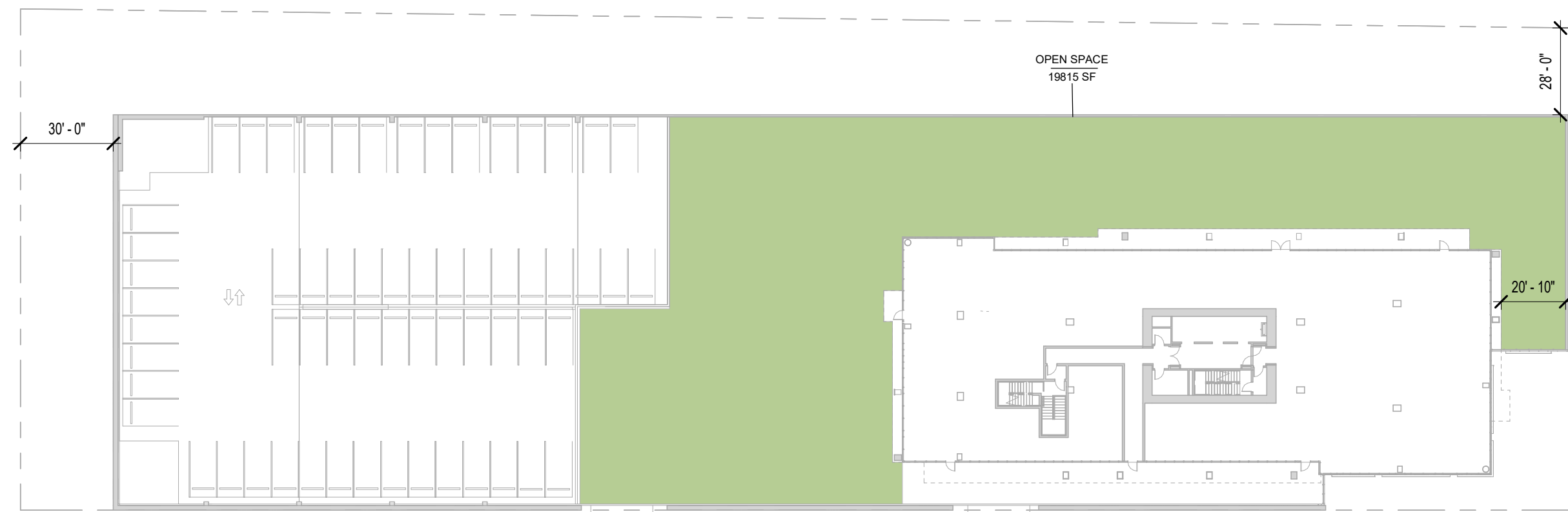
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Sheet Number: **A0.02B**

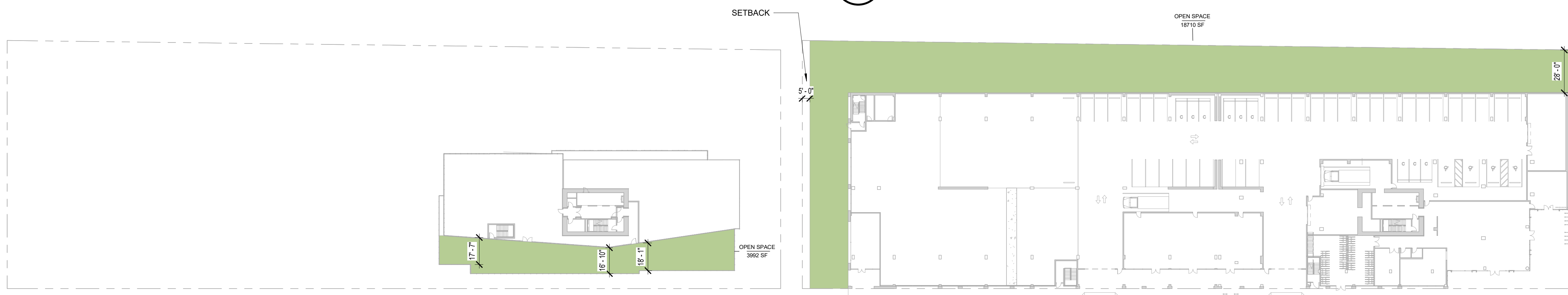
NO. DATE DESCRIPTION



3 LEVELS 04-23 OPEN SPACE
SCALE: 1" = 40'-0"



2 LEVEL 03 - OPEN SPACE
SCALE: 1" = 40'-0"



1 LEVEL 01 - OPEN SPACE
SCALE: 1" = 40'-0"

4 LEVEL 24 SKYDECK - OPEN SPACE
SCALE: 1" = 40'-0"

OPEN SPACE CALCULATIONS

LEVEL	OPEN SPACE
BALCONIES 180 @ 50 SF	9,000 SF
LEVEL 24	3,992 SF
LEVEL 03	19,815 SF
LEVEL 01	18,710 SF
TOTAL	51,517 SF
	41,550 SF REQ.

LEGEND

OPEN SPACE



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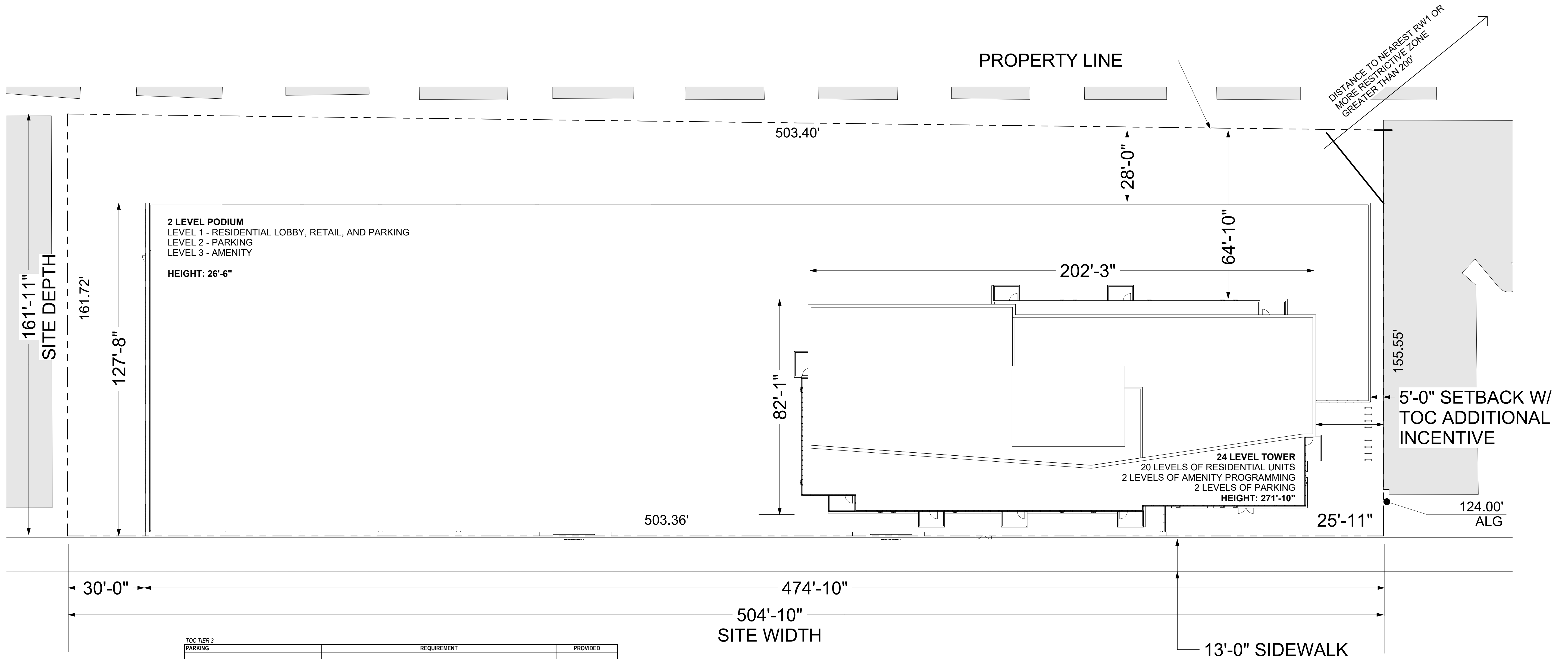
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**OPEN SPACE
DIAGRAMS**

Project Number: 2021034

Sheet Number: **A0.02C**



2 LEVEL PODIUM
 LEVEL 1 - RESIDENTIAL LOBBY, RETAIL, AND PARKING
 LEVEL 2 - PARKING
 LEVEL 3 - AMENITY
 HEIGHT: 26'-6"

24 LEVEL TOWER
 20 LEVELS OF RESIDENTIAL UNITS
 2 LEVELS OF AMENITY PROGRAMMING
 2 LEVELS OF PARKING
 HEIGHT: 271'-10"

SITE DESCRIPTION
 DWELLING UNITS: 290

TOC TIER 3		
PARKING	REQUIREMENT	PROVIDED
RESIDENTIAL PARKING	0.5 SPACE PER UNIT (TOC TIER 3): 0.5 X 290 = 145 SPACES	384 SPACES
COMMERCIAL PARKING	1 SPACE PER 100 SF TOC TIER 30% REDUCTION THEN APPLIED: 39 (1 PER 100 SF) - 11 (30%) = 28 SPACES	28 SPACES
		412 SPACES

PROVIDED PARKING DETAILS					
	STANDARD	COMPACT	ACCESSIBLE	USPS	TOTAL
LEVEL 3 PARKING	59	0	0	0	59
LEVEL 2 PARKING	95	13	4	0	112
LEVEL 1 PARKING	78	9	4	1	92
BT PARKING	132	16	1	0	149
					412

LOS ANGELES MUNICIPAL CODE Table 12.21 A.16(a)(1)(ii)		
BICYCLE PARKING (RESIDENTIAL)	REQUIRED	PROVIDED
SHORT-TERM	15 SPACES REQUIRED	16
	Short Term	
	1-25 units = 1 per 10 units (2.5 spaces)	
	26-100 units = 1 per 15 units (6.5 spaces)	
	101-200 = 1 per 20 units (5 spaces)	
	201+ = 1 per 40 units (2.25 spaces)	
	Total short term = 15 spaces	
LONG-TERM	147 SPACES REQUIRED	160
	Long Term	
	1-25 units = 1 per unit (25 spaces)	
	26-100 units = 1 per 1.5 units (60 spaces)	
	101-200 units = 1 per 2 units (50 spaces)	
	201+ units = 1 per 4 units (22.5 spaces)	
	Total long term = 147 spaces	
BICYCLE PARKING (COMMERCIAL)	6 SPACES REQUIRED	
SHORT-TERM	1 SPACE FOR 2000SF = 3 SPACES	4
LONG-TERM	1 SPACE PER 2000SF = 3 SPACES	4
		184

LA CIENEGA BOULEVARD

LEGAL DESCRIPTION: REF. TO ALTA SURVEY PROVIDED ON CIVIL DRAWINGS

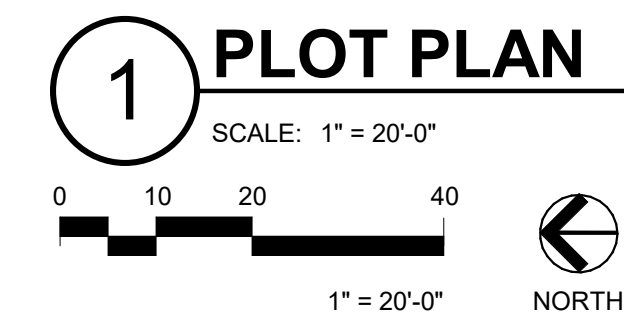
TRACT 7170:
 LOTS 119, 120, 121, 122

TRACT 7171:
 LOTS 233, 234, 235, 237

BLOCK: NONE

PROJECT ADDRESS:
 1066 S LA CIENEGA BOULEVARD
 LOS ANGELES, CALIFORNIA 90035

DEDICATIONS:
 NO DEDICATIONS REQUIRED



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NO.	DATE	DESCRIPTION

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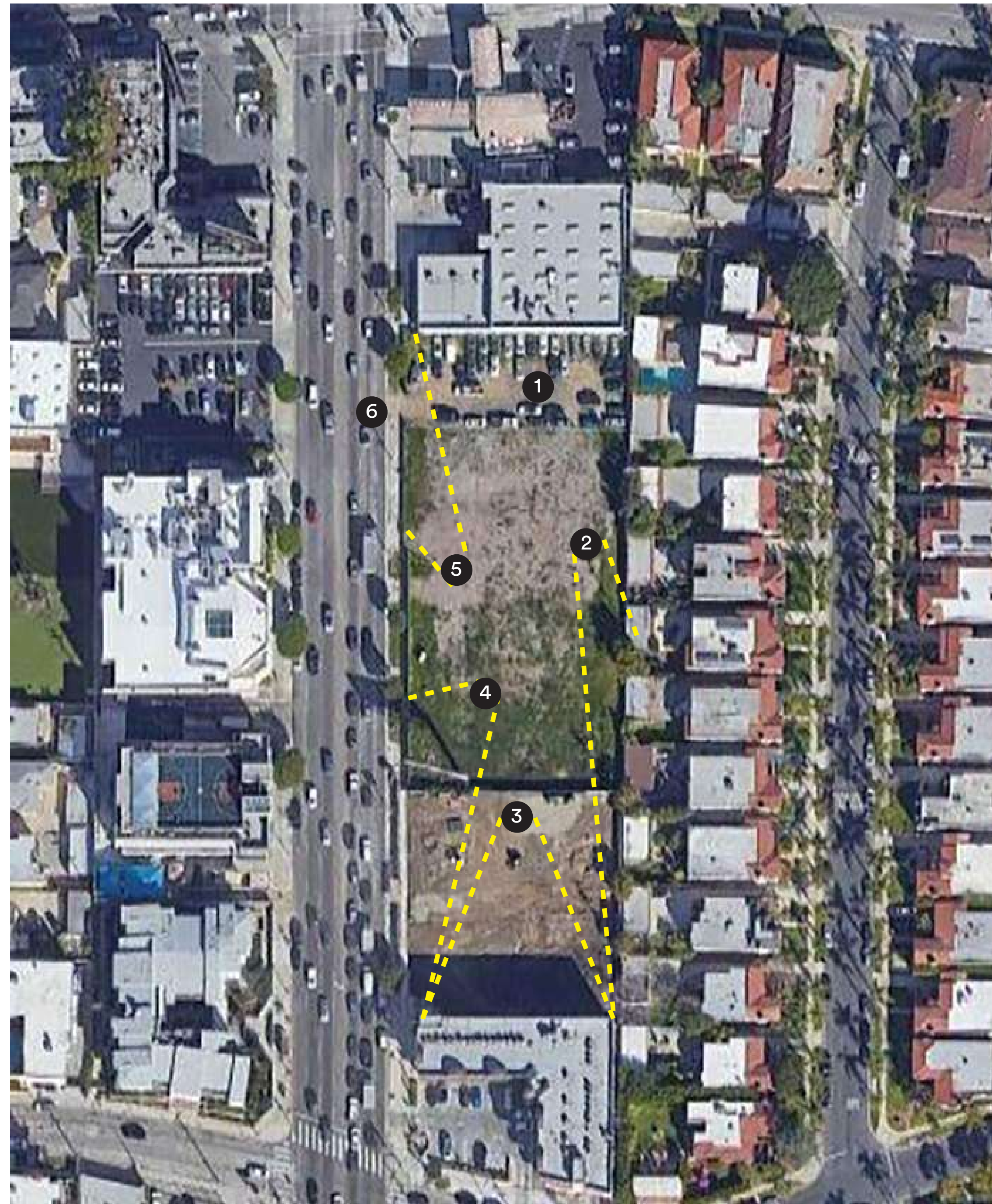
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PLOT PLAN

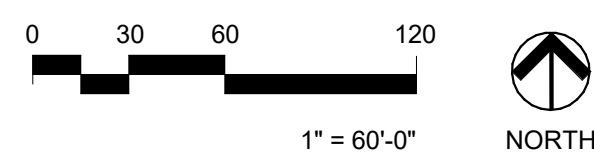
Project Number: 2021034

Sheet Number: **A0.03**



1 SITE CONTEXT

SCALE: 1" = 60'-0"



1 VIEW OF NORTH END OF SITE



2 VIEW LOOKING TOWARDS EAST SIDE OF SITE



3 VIEW LOOKING TOWARDS SOUTH END OF SITE



4 VIEW LOOKING TOWARDS WEST SIDE OF SITE



5 VIEW OF WEST SIDE OF SITE LOOKING NORTH



6 VIEW FROM WEST SITE FRONTAGE LOOKING SOUTH DOWN LA CIENEGA



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**EXISTING SITE
PHOTOS**

Project Number: 2021034

Sheet Number: **A0.04**



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DAVID EVANS
AND ASSOCIATES INC.

RIOS

NO.	DATE	DESCRIPTION

1050 LA CIENEGA

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LOS ANGELES, CA 90035

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**EXTERIOR
RENDERINGS**

Project Number: 2021034

Sheet Number: **A0.05**



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**EXTERIOR
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Project Number: 2021034

Sheet Number: **A0.06**



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**EXTERIOR
 RENDERINGS**

Project Number: 2021034

Sheet Number: **A0.07**

ZONING INFORMATION

ZONING REPORT PROVIDED BY: PARTNER ENGINEERING AND SCIENCE DATE OF REPORT: JUNE 08, 2021 PARTNER PROJECT NUMBER: 21-321356.1 ZONING DESIGNATION: "C2-10" COMMERCIAL ZONE - HEIGHT DISTRICT NO. 1 - OL DRILLING DISTRICT CURRENT PROPERTY USE: VACANT LAND PROPOSED PROPERTY USE: SENIOR FACILITY MINIMUM FRONT YARD SETBACK: NOT REQUIRED MINIMUM SIDE YARD SETBACK: NOT REQUIRED FOR BUILDINGS ERECTED AND USED EXCLUSIVELY FOR COMMERCIAL PURPOSES...

FLOOD ZONE

A FIELD SURVEY WAS NOT CONDUCTED TO DETERMINE THE FLOOD ZONE AREAS. ANY FLOOD ZONE LINES DISTINGUISHING BETWEEN FLOOD AREAS ARE GRAPHICALLY PLOTTED FROM FEMA FLOOD INSURANCE RATE MAPS (FIRM). A FLOOD ELEVATION CERTIFICATE MAY BE NEEDED TO DETERMINE OR VERIFY THE LOCATION OF THE FLOOD AREAS...

MISCELLANEOUS NOTES

- N1 THE BASIS OF BEARINGS OF THIS SURVEY IS BASED ON THE CENTERLINE OF S. LA CIENEGA BOULEVARD PER TRACT NO. 7171 FILED IN MAP BOOK 77/19. N2 THE TABLE BELOW DESCRIBES THE TYPE AND NUMBER OF PARKING STALLS ENTIRELY WITHIN PROPERTY BOUNDARY...

PARKING

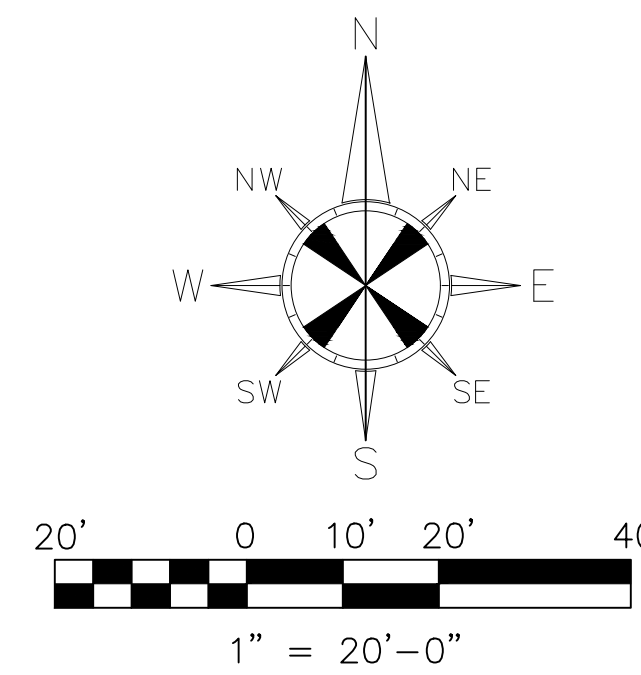
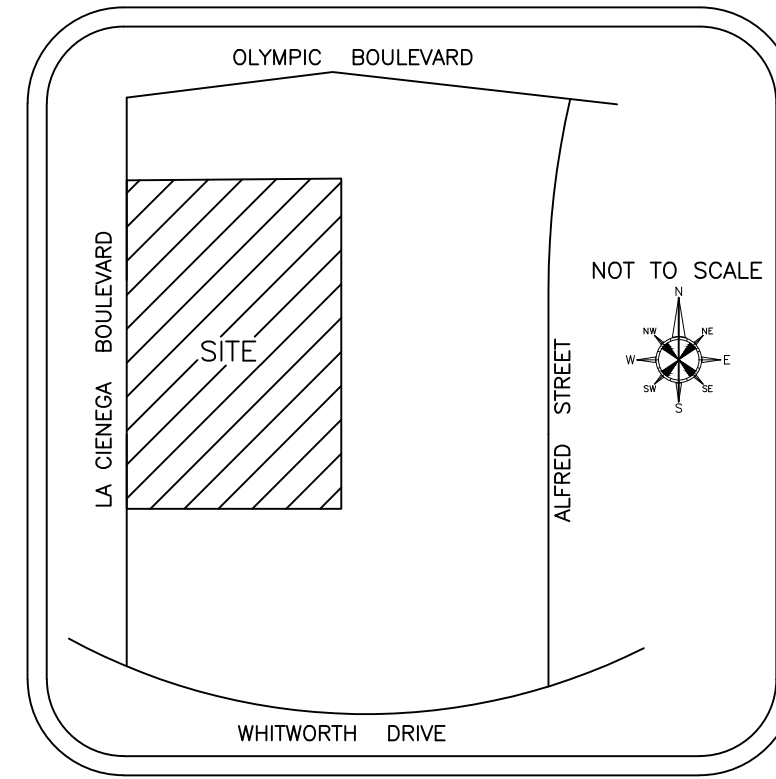
Table with 5 columns: REGULAR, DISABLED, TRAILER, PARTIAL, TOTAL. All values are 0.

- N3 NO EVIDENCE OF RECENT EARTH MOVING WORK, BUILDING CONSTRUCTION OR BUILDING ADDITIONS OBSERVED IN THE PROCESS OF CONDUCTING THE FIELDWORK ON THE SUBJECT PROPERTY. N4 THERE ARE NO PROPOSED CHANGES IN STREET RIGHT OF WAY LINES...

UTILITY NOTE

1 THE SURVEY SHOWS THE LOCATION OF UTILITIES EXISTING ON OR SERVING THE SURVEYED PROPERTY AS DETERMINED BY OBSERVED EVIDENCE COLLECTED PURSUANT TO ALTA SECTION 5 E IV WHILE THE LOCATION OF UNDERGROUND UTILITIES ARE ASSUMED TO BE ACCURATE...

VICINITY MAP



STATEMENT OF ENCROACHMENTS

- E1 FENCE ENCSOACHES INTO RIGHT OF WAY BY 0.27' E2 FENCE ENCSOACHES INTO RIGHT OF WAY BY 1.23' E3 FENCE ENCSOACHES INTO RIGHT OF WAY BY 2.70' E4 FENCE ENCSOACHES INTO RIGHT OF WAY BY 2.18'...

SURVEY RELATED ITEMS CORRESPONDING TO SCHEDULE B TITLE COMMITMENT

- ITEM #'S 1 THROUGH 8 ARE NON SURVEY RELATED - NOT PLOTTED 9 EASEMENT FOR PUBLIC UTILITIES AND RIGHTS INCIDENTAL CONTAINED IN DOCUMENT RECORDED IN BOOK 3829, PAGE 378 OF OFFICIAL RECORDS - PLOTTED HEREON.

TITLE LEGAL DESCRIPTION

THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:

PARCEL ONE: LOT 121 OF TRACT NO. 7170, IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 76, PAGE 12 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY. PARCEL TWO: LOT 122 OF TRACT NO. 7170, IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 76, PAGE 12 OF MAPS...

CERTIFICATION

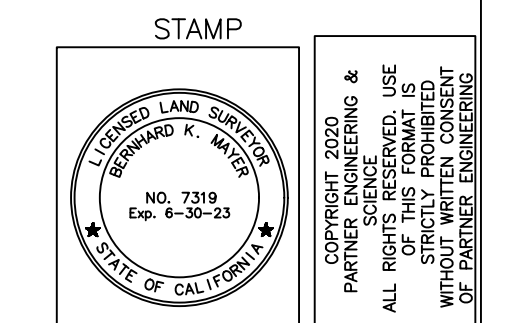
TO: Carmel Partners Realty VII, LLC, a Delaware limited liability company, its successors and assigns; First American Title Insurance Company, and each of their respective successors and assigns:

THIS IS TO CERTIFY THAT THIS MAP OR PLAT AND THE SURVEY ON WHICH IT IS BASED WERE MADE IN ACCORDANCE WITH THE 2021 MINIMUM STANDARD DETAIL REQUIREMENTS FOR ALTA/NSPS LAND TITLE SURVEYS, JOINTLY ESTABLISHED AND ADOPTED BY ALTA AND NSPS...

DATE OF PLAT OR MAP: JUNE 09, 2021

PROPERTY ADDRESS: 1022-1054 S LA CIENEGA, LOS ANGELES CA 90035

BERNHARD K. MAYER Registration No. P.L.S. 7319 In the State of California Field Date of Survey: 05/24/21 Revision Date: 06/11/21...



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RIOS

Table with 3 columns: NO., DATE, DESCRIPTION

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ALTA SURVEY (FOR REFERENCE ONLY)

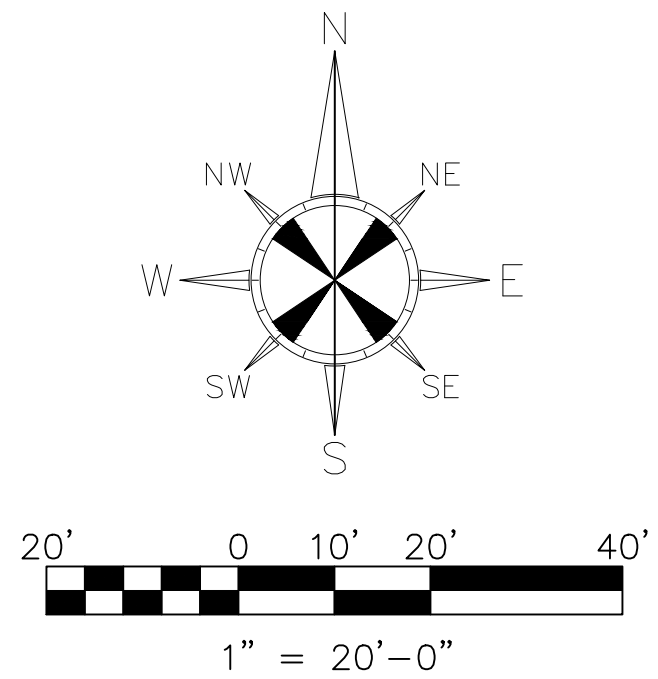
Project Number:

Sheet Number:

C0.01

LEGEND

- APN ASSESSORS PARCEL NUMBER
- ASPH ASPHALT
- B BOLLARD
- CR CABLE TV RISER
- CONC CONCRETE
- DOC. DOCUMENT
- DI DRAIN INLET
- D/W DRIVEWAY
- DCV DETECTOR CHECK VALVE
- EV ELECTRIC VAULT
- FS FIRE SERVICE
- FIN FIRE LINE INLET
- FDC FIRE DEPARTMENT CONNECTION
- FP FLAG POLE
- GM GAS METER
- GTM GATE MOTOR
- GW GUY WIRE
- Handicap Space
- H HEIGHT
- LS LIGHT STANDARD
- NO. NUMBER
- O.R. OFFICIAL RECORDS
- PA PLANTER AREA
- PL PROPERTY LINE
- PP POWER POLE
- SN SIGN
- SP SERVICE POLE
- SL STREET LIGHT
- SMH SEWER MANHOLE
- SLV STREET LIGHT VAULT
- UC UTILITY CABINET
- W/ WITH
- WM WATER METER
- WWT WATER VAULT
- WV WATER VALVE
- Stucco or Block Wall - Typical
- MF METAL FENCE - TYPICAL
- WIF WROUGHT IRON FENCE - TYPICAL
- CLF CHAIN LINK FENCE - TYPICAL
- OH OVERHANG
- OHU OVERHEAD UTILITY LINE
- Painted Hatch Area
- Parking Space Counter
- Deciduous Tree
- Palm Tree



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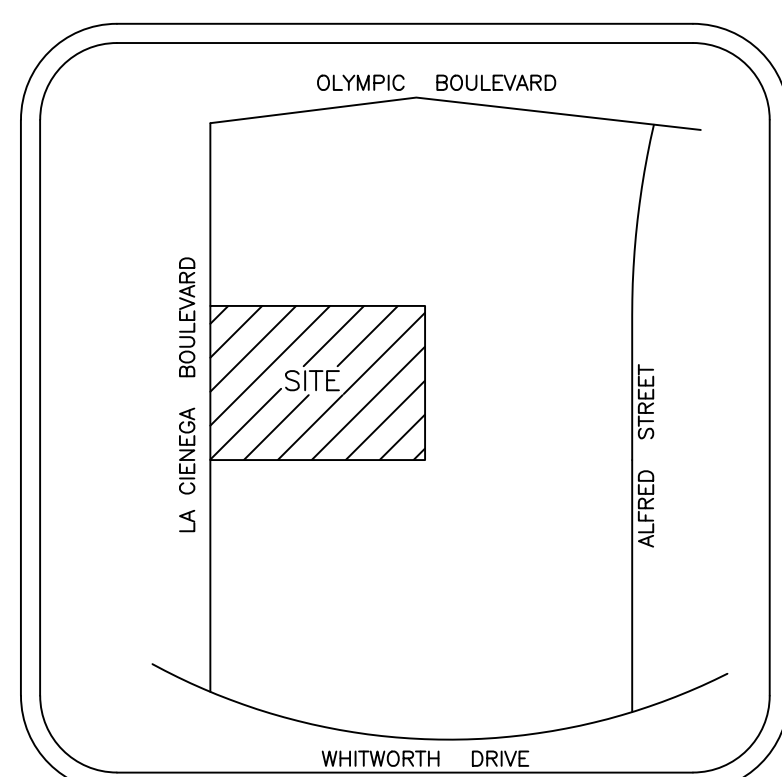
ALTA SURVEY
 (FOR REFERENCE
 ONLY)

Project Number:
 Sheet Number: **C0.02**

ZONING INFORMATION

ZONING INFORMATION PROVIDED BY ARMBRUSTER GOLDSMITH DELVAC LLP
ZONING DESIGNATION: C2-1-O.
BASE DENSITY: ONE UNIT PER 400 SQUARE FEET OF LOT AREA, WHICH WOULD PERMIT A BASE DENSITY OF 200 DWELLING UNITS.

VICINITY MAP



FLOOD ZONE

A FIELD SURVEY WAS NOT CONDUCTED TO DETERMINE THE FLOOD ZONE AREAS. ANY FLOOD ZONE LINES DISTINGUISHING BETWEEN FLOOD AREAS ARE GRAPHICALLY PLOTTED FROM FEMA FLOOD INSURANCE RATE MAPS (FIRM).

MISCELLANEOUS NOTES

- N1 THE BASIS OF BEARINGS OF THIS SURVEY IS BASED ON THE CENTERLINE OF LA CIENEGA BOULEVARD PER TRACT NO. 10756.
N2 THE TABLE BELOW DESCRIBES THE TYPE AND NUMBER OF PARKING STALLS ENTIRELY WITHIN PROPERTY BOUNDARY.

Table with 5 columns: REGULAR, DISABLED, TRAILER, PARTIAL, TOTAL. Values: 0, 0, 0, 0, 0.

- N3 NO EVIDENCE OF RECENT EARTH MOVING WORK, BUILDING CONSTRUCTION OR BUILDING ADDITIONS OBSERVED IN THE PROCESS OF CONDUCTING THE FIELDWORK.
N4 THERE ARE NO PROPOSED CHANGES IN STREET RIGHT OF WAY LINES, IF SUCH INFORMATION IS MADE AVAILABLE TO THE SURVEYOR BY THE CONTROLLING JURISDICTION.
N5 THE NEAREST INTERSECTING STREET, LA CIENEGA BOULEVARD AND WHITWORTH DRIVE ARE ABUTTING THE SUBJECT PROPERTY AND ARE DESIGNATED ON SURVEY MAP FOR CLARITY.

UTILITY NOTE

- 1 THE SURVEY SHOWS THE LOCATION OF UTILITIES EXISTING ON OR SERVING THE SURVEYED PROPERTY AS DETERMINED BY OBSERVED EVIDENCE COLLECTED PURSUANT TO ALTA SECTION 5 EIV

SURVEY RELATED ITEMS CORRESPONDING TO SCHEDULE B TITLE COMMITMENT

- ITEM #'S 1 THROUGH 8 ARE NON SURVEY RELATED - DO AFFECT - NOT PLOTTED.
7 EASEMENT FOR POLE LINES, CONDUITS, SEWER PIPES AND INCIDENTAL PURPOSES CONTAINED IN DOCUMENT RECORDED IN BOOK 4905, PAGE 341 OF OFFICIAL RECORDS - DOES AFFECT - PLOTTED HEREON.
10 EASEMENT FOR PUBLIC UTILITIES AND INCIDENTAL PURPOSES CONTAINED IN DOCUMENT RECORDED IN BOOK 4710, PAGE 58 OF OFFICIAL RECORDS - DOES AFFECT - PLOTTED HEREON.

SURVEY RELATED ITEMS CORRESPONDING TO SCHEDULE B TITLE COMMITMENT

- 27 TERMS AND PROVISIONS CONTAINED IN DOCUMENT ENTITLED "COVENANT AND AGREEMENT REGARDING MAINTENANCE OF BUILDING SUPPORT" RECORDED AUGUST 15, 2018 AS INSTRUMENT NO. 20180821483 OF OFFICIAL RECORDS - DOES AFFECT - PLOTTED HEREON.
28 TERMS AND PROVISIONS CONTAINED IN DOCUMENT ENTITLED "COVENANT AND AGREEMENT REGARDING MAINTENANCE OF BUILDING SUPPORT" RECORDED AUGUST 15, 2018 AS INSTRUMENT NO. 20180821484 OF OFFICIAL RECORDS - DOES AFFECT - PLOTTED HEREON.
ITEM # 29 HAS BEEN INTENTIONALLY DELETED.

TITLE LEGAL DESCRIPTION

THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:
PARCEL 1:
LOTS 235 AND 236 OF TRACT 7171, IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 77, PAGE 19 OF OFFICIAL RECORDS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

THE PROPERTY DESCRIBED HEREON IS THE SAME AS THE PROPERTY DESCRIBED IN THE FIRST AMERICAN TITLE INSURANCE COMPANY COMMITMENT NO. NCS-1068267-CH2 (THE "TITLE COMMITMENT") WITH AN EFFECTIVE DATE OF MAY 04, 2021 AND THAT ALL EASEMENTS, COVENANTS AND RESTRICTIONS REFERENCED IN SAID TITLE COMMITMENT OR APPARENT FROM A PHYSICAL INSPECTION OF THE SITE OR OTHERWISE KNOWN TO ME HAVE BEEN PLOTTED HEREON OR OTHERWISE NOTED AS TO THEIR EFFECT ON THE SUBJECT PROPERTY.

ALTA/NSPS LAND TITLE SURVEY

FOR
1056-1066 S. La Cienega Boulevard
PARTNER PROJECT NUMBER 21-315880.2 SITE NUMBER []
ALTA SURVEY BASED AND RELIED ON FIRST AMERICAN TITLE INSURANCE COMPANY POLICY OF TITLE, NUMBER NCS-1068267-CH2, CONTAINING A DATE OF POLICY AND TIME OF MAY 04, 2021 AT 7:30 AM

CERTIFICATION

TO: Carmel Partners Realty VII, LLC, a Delaware limited liability company, its successors and assigns; First American Title Insurance Company.
THIS IS TO CERTIFY THAT THIS MAP OR PLAT AND THE SURVEY ON WHICH IT IS BASED WERE MADE IN ACCORDANCE WITH THE 2021 MINIMUM STANDARD DETAIL REQUIREMENTS FOR ALTA/NSPS LAND TITLE SURVEYS, JOINTLY ESTABLISHED AND ADOPTED BY ALTA AND NSPS, AND INCLUDES ITEMS 2, 3, 4, 6a, 6b, 7a, 7b1, 7c, 8, 9, 13, 14, 16 and 17 OF TABLE A THEREOF. THE FIELDWORK WAS COMPLETED ON APRIL 26, 2021.

DATE OF PLAT OR MAP: MAY 04, 2021
PROPERTY ADDRESS: 1056-1066 S. La Cienega Boulevard, Los Angeles, CA 90035

BERNHARD K. MAYER
Registration No. P.L.S. 7319
In the State of California
Field Date of Survey: April 26, 2021
Revision Date: June 14, 2021
Revision Date: June 17, 2021
Latest Revision Date: August 12, 2021

STAMP
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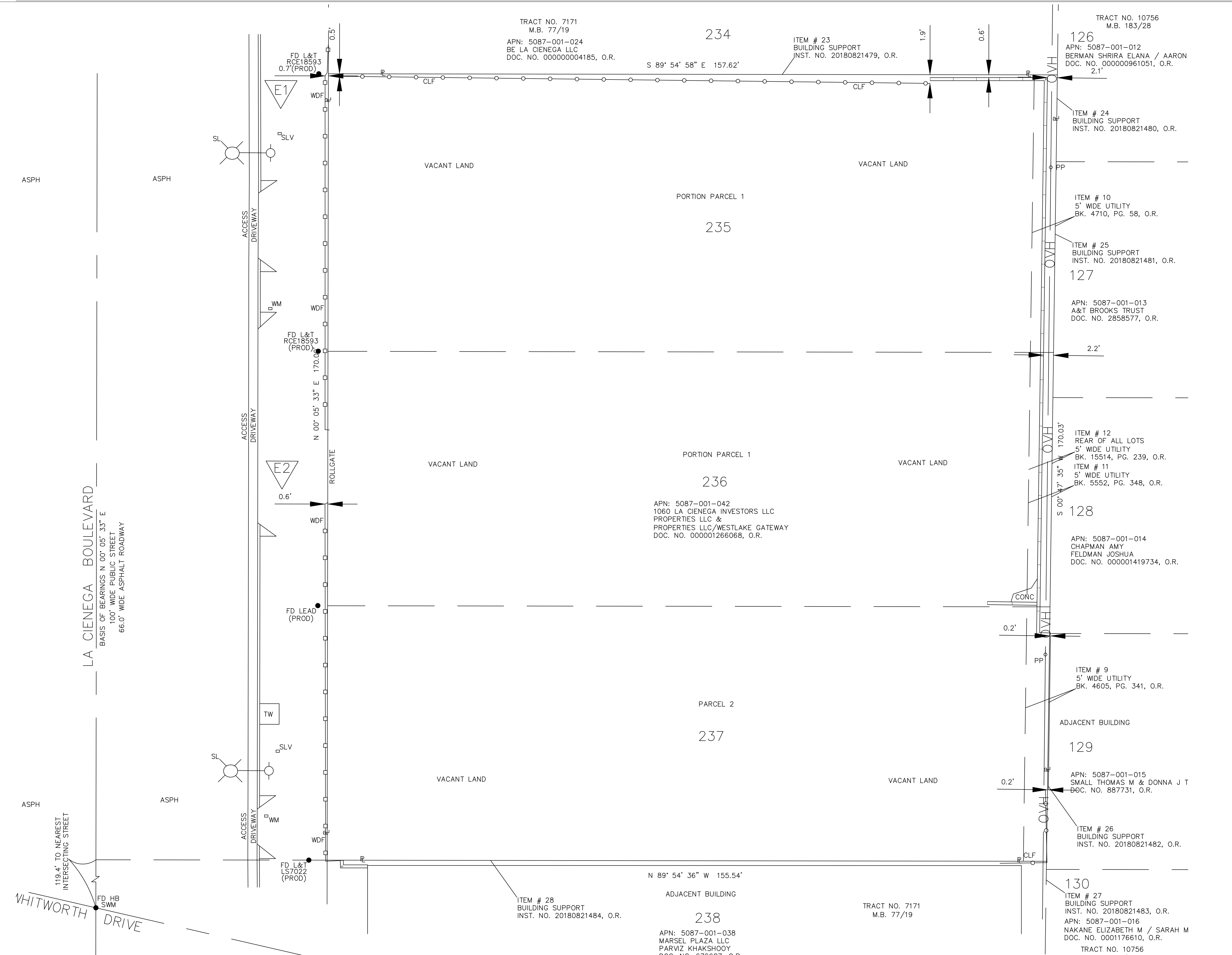


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NO. DATE DESCRIPTION

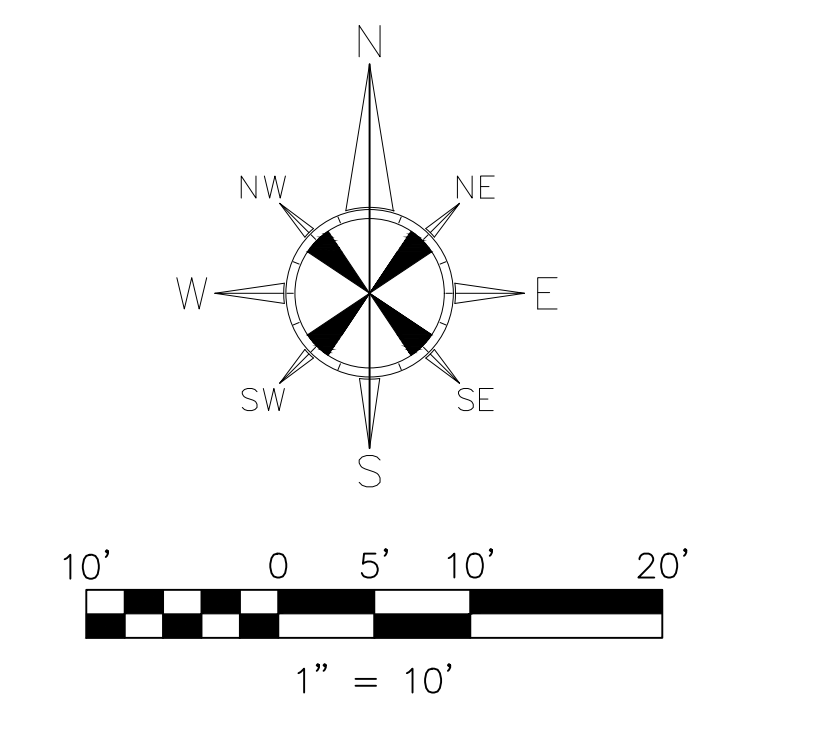
ALTA SURVEY (FOR REFERENCE ONLY)

Project Number:
Sheet Number: C0.03



LEGEND

- APN ASSESSOR'S PARCEL NUMBER
- ASPH ASPHALT
- BK BOOK
- CLF CHAIN LINK FENCE
- DOC DOCUMENT
- FD FOUND MONUMENT - AS NOTED
- HB HEX BOLT
- INST. INSTRUMENT
- L&T LEAD AND TAG
- M.B. MAP BOOK
- NO. NUMBER
- O.R. OFFICIAL RECORDS
- PG. PAGE
- PL PROPERTY LINE
- PP POWER POLE
- PROD PRODUCED
- SL STREET LIGHT
- SLV STREET LIGHT VAULT
- SMM STANDARD WELL MONUMENT
- TW TREE WELL
- WDF WOOD FENCE
- WM WATER METER
- WALL BLOCK - TYPICAL
- - - - EASEMENT LINES
- OVH- OVERHEAD UTILITY LINE



ALTA/NSPS LAND TITLE SURVEY

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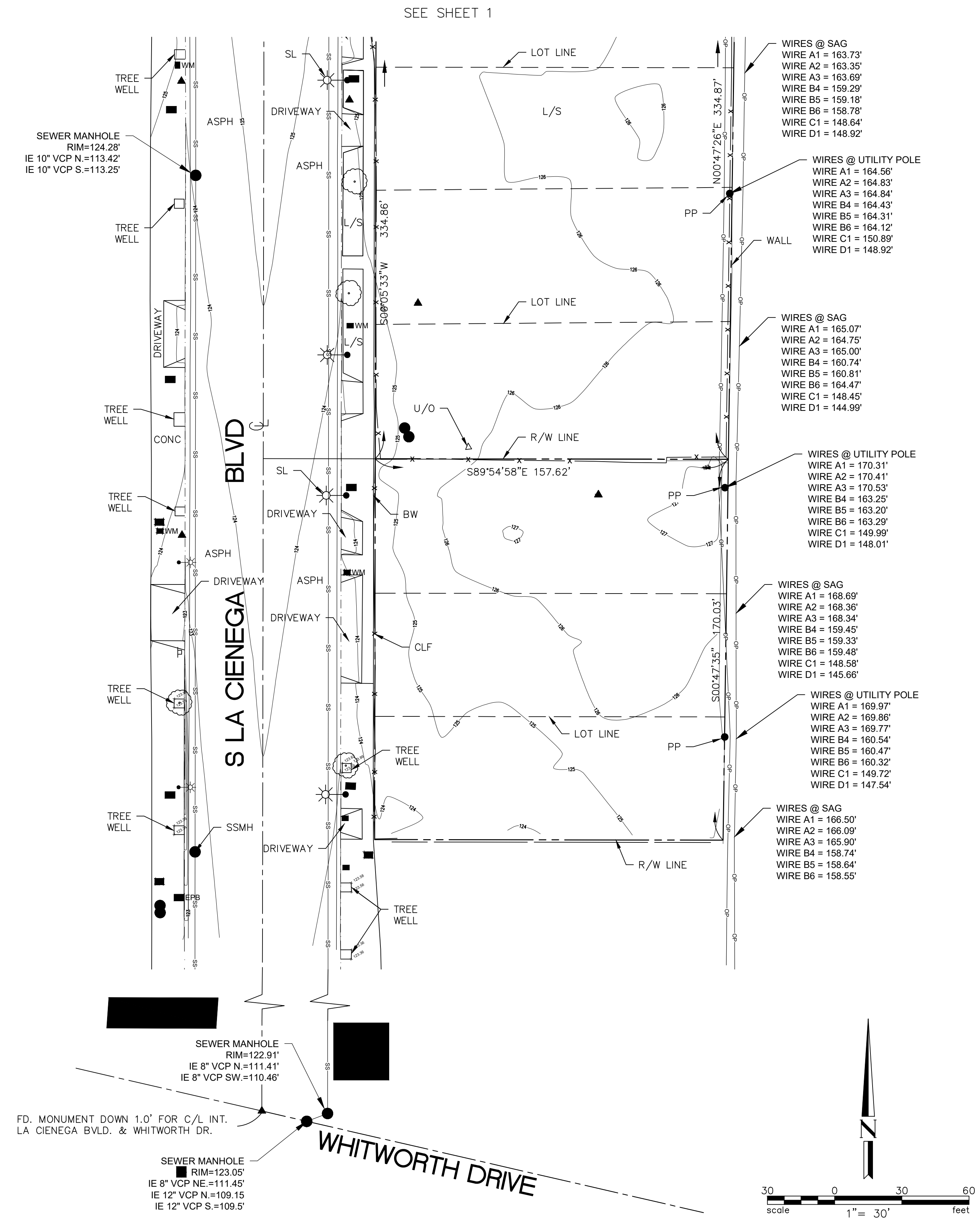
**ALTA SURVEY
 (FOR REFERENCE ONLY)**

Project Number:

Sheet Number: C0.04

LEGEND	
ABBREVIATION	DENOTES
AC	ASPHALT
BW	BACK OF WALK
BLDG.	BUILDING
C.O.	CLEAN OUT
CLF	CHAIN LINK FENCE
U/O	UNIDENTIFIED OBJECT
EOC	EDGE OF CONCRETE
ICV	IRRIGATION CONTROL VALVE
TC	TOP OF CURB
TW	TOP OF WALL
SLPB	STREET LIGHT PULL BOX
SL	STREET LIGHT
SSMH	SEWER MANHOLE
LIP	EDGE OF GUTTER
E	EAST
W	WEST
N	NORTH
S	SOUTH
PP	POWER POLE
R	PROPERTY LINE
E/O	EAST OF
W/O	WEST OF
N/O	NORTH OF
S/O	SOUTH OF
WIF	WROUGHT IRON FENCE
L/S	LANDSCAPE AREA

LEGEND	
SYMBOL	DENOTES
●	STORM DRAIN MANHOLE
●	SEWER MANHOLE
■ WM	WATER METER
●	LIGHT POLE WITH ARM
●	POWER POLE
— x —	CHAIN FENCE LINK
■	TRAFFIC SIGNAL JUNCTION BOX
—	FLOW LINE
□	SIGN
■	POWER JUNCTION/PULL BOX
●	WELL
○	TREE
■	POWER STREET LIGHT JUNCTION BOX
⊥	CENTERLINE



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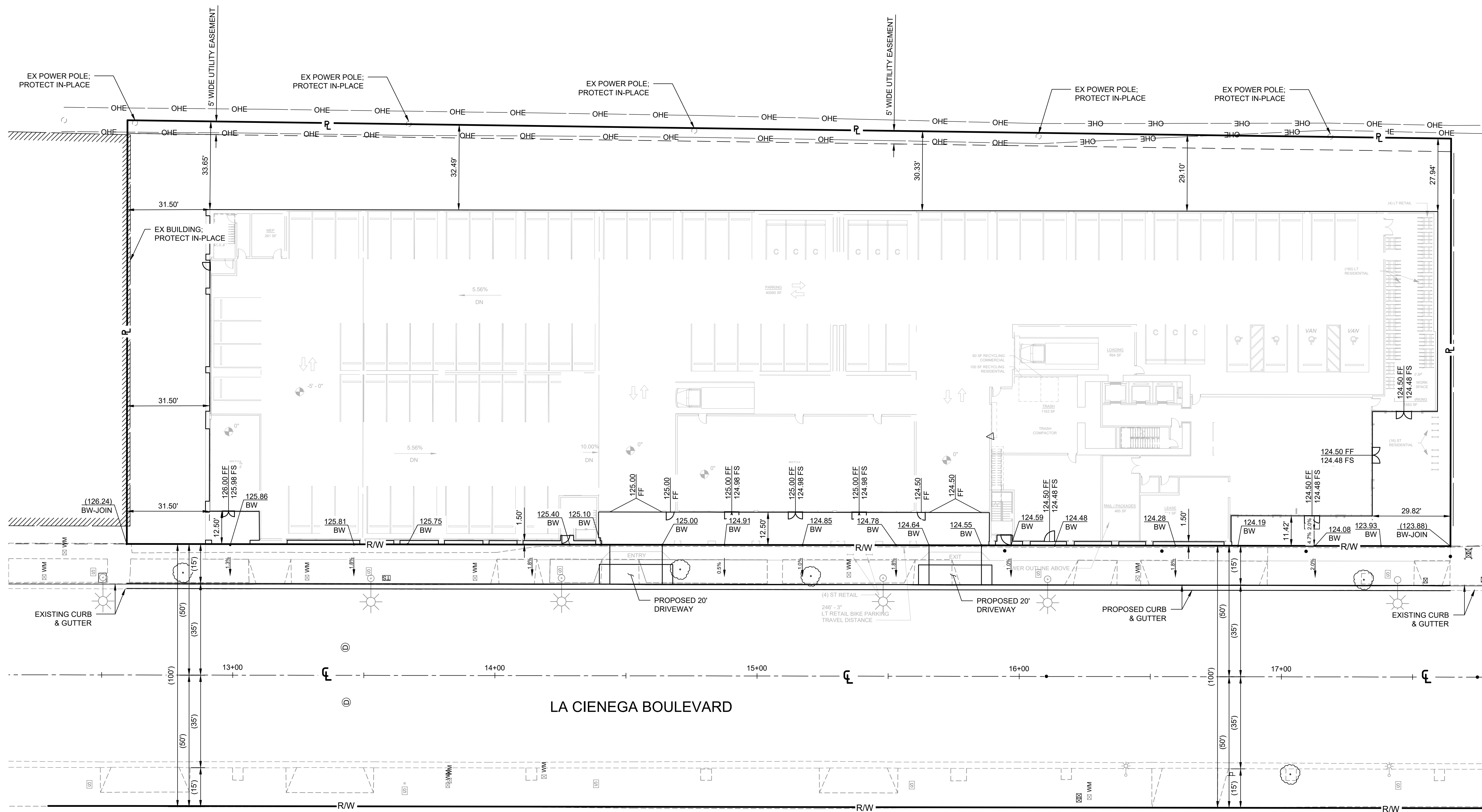
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TOPOGRAPHIC
SURVEY

Project
Number:

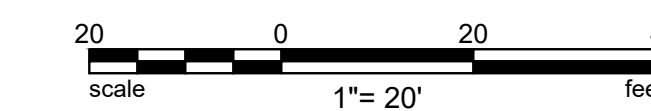
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LEGEND

- ⊕ CENTER LINE
- ⊔ PROPERTY LINE
- R/W RIGHT OF WAY
- BW BACK OF WALK



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**BACK OF WALK
EXHIBIT**

Project
Number:

Sheet
Number:

C2.01

NO.	DATE	DESCRIPTION

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GENERAL NOTES

- EARTHWORK PERFORMED SHALL CONFORM TO REQUIREMENTS INDICATED IN THE GEOTECHNICAL INVESTIGATION REPORT.
- FINISHED FLOOR (FF) ELEVATION USED FOR EARTHWORK CALCULATIONS ARE AS FOLLOWS:
B1 LEVEL: VARIES 105.00'-115.00'
1ST LEVEL: 125.00'
- THE EARTHWORK QUANTITIES DO NOT TAKE INTO ACCOUNT THE EXCAVATION OF THE FOOTINGS, SHRINKAGE, COMPACTION, OR BULKING OF SOIL.
- A 6" THICK PROPOSED SLAB AND 2" SAND WAS USED IN EARTHWORK CALCULATIONS FOR THE BUILDING. CONTRACTOR SHALL VERIFY SLAB THICKNESS, SUB-BASE MATERIAL, AND WATERPROOFING PRIOR TO ESTABLISHING PAD ELEVATIONS.
- SHORING SHOWN HEREON IS FOR REFERENCE ONLY. SEE SHORING PLANS BY OTHERS.

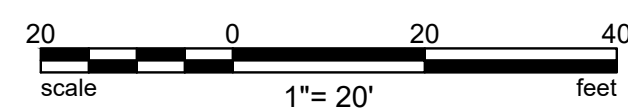
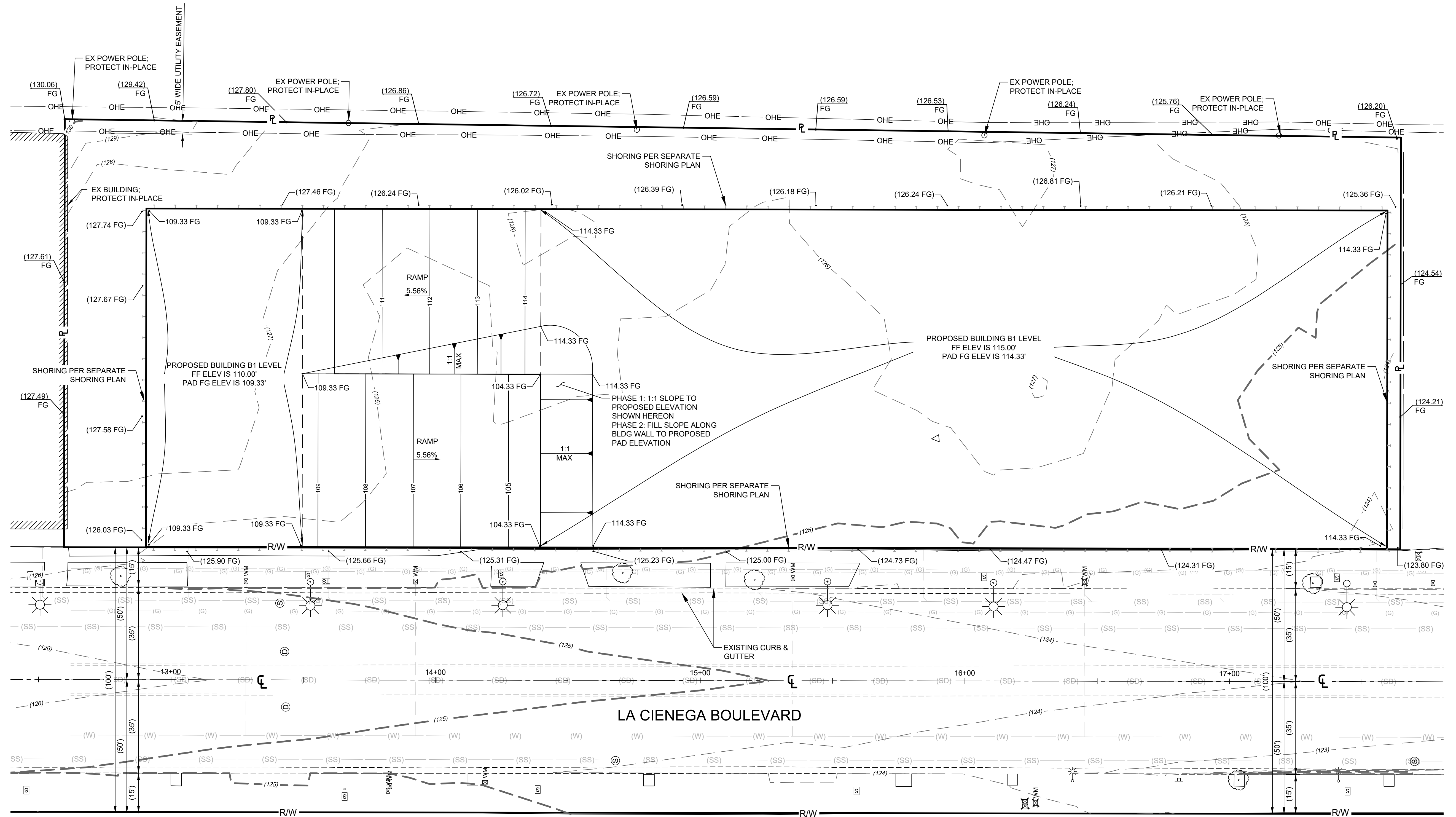
EARTHWORK CALCULATIONS

RAW QUANTITIES:
CUT = 33,680 CY
FILL = 0 CY

TOTAL EXPORT = 33,680 CY

LEGEND

- (W) — EXISTING WATER
- (SS) — EXISTING SEWER
- (SD) — EXISTING STORM DRAIN
- (G) — EXISTING GAS
- OHE — EXISTING OVERHEAD ELECTRICAL
- ℄ — CENTER LINE
- ℄ — PROPERTY LINE
- R/W — RIGHT OF WAY
- BW — BACK OF WALK
- CY — CUBIC YARDS
- EX — EXISTING
- FF — FINISHED FLOOR
- FG — FINISHED GRADE
- FS — FINISHED SURFACE
- (XXX.XX) — EXISTING ELEVATION
- XXX.XX — PROPOSED ELEVATION
- 1H:1V — 1' HORIZONTAL TO 1' VERTICAL
- — PROPOSED EXCAVATED SLOPE
- I I I — SHORING (FOR REFERENCE ONLY)



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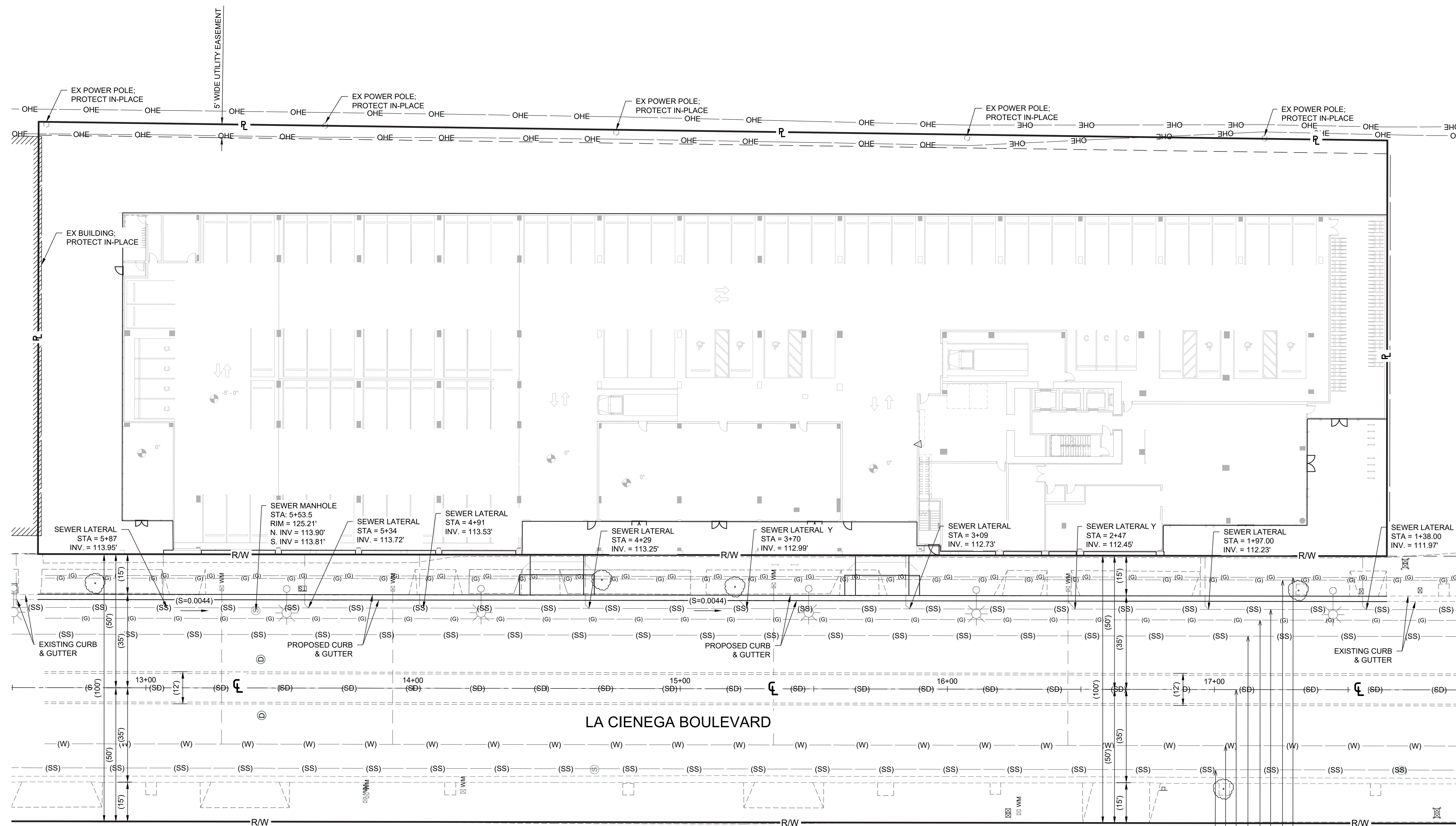
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EXCAVATION PLAN

Project Number:

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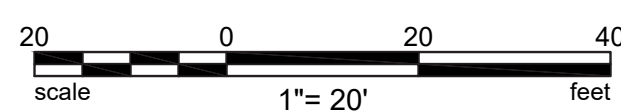
C3.01



10" SEWER 30' W/O 1.
 6" WATER 21' W/O 1.
 3/4" STORM DRAIN REINFORCED CONDUIT @ 1.
 42" SANITARY SEWER 20' E/O 1.
 3" SCG (ABAND.) 28' E/O 1.
 8" SEWER 30' E/O 1.
 3" SCG (ABAND.) 41' E/O 1.
 2" SCG P.E.M. 42' E/O 1.

LEGEND

- (W) — EXISTING WATER
- (SS) — EXISTING SEWER
- (SD) — EXISTING STORM DRAIN
- (G) — EXISTING GAS
- € CENTER LINE
- ℙ PROPERTY LINE
- R/W RIGHT OF WAY



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**CONCEPTUAL
UTILITY PLAN**

Project
Number:

Sheet
Number:

C4.01



1 SITE PLAN
 SCALE: 1" = 40'-0"
 0 20 40 80
 1" = 40'-0" NORTH



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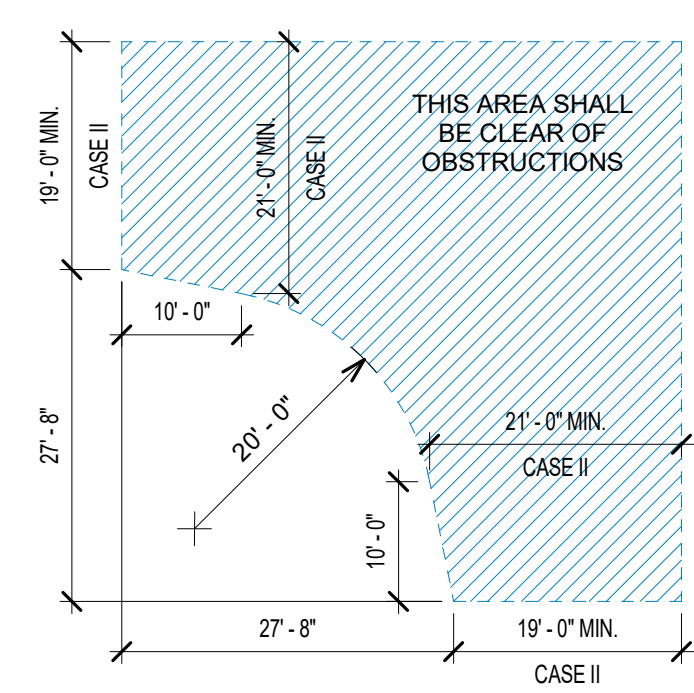
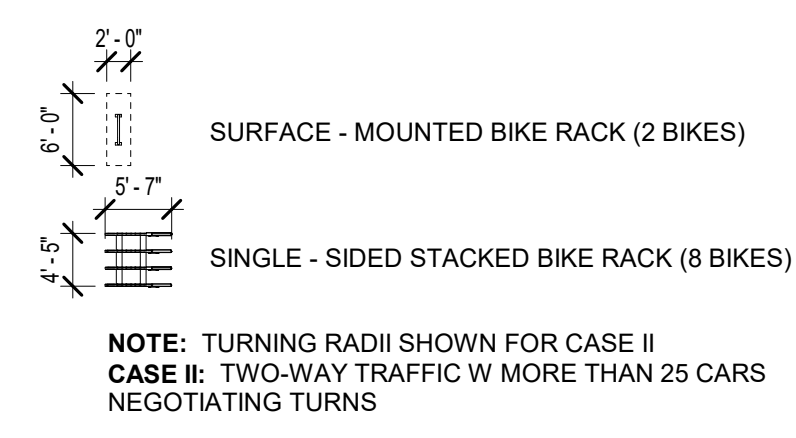
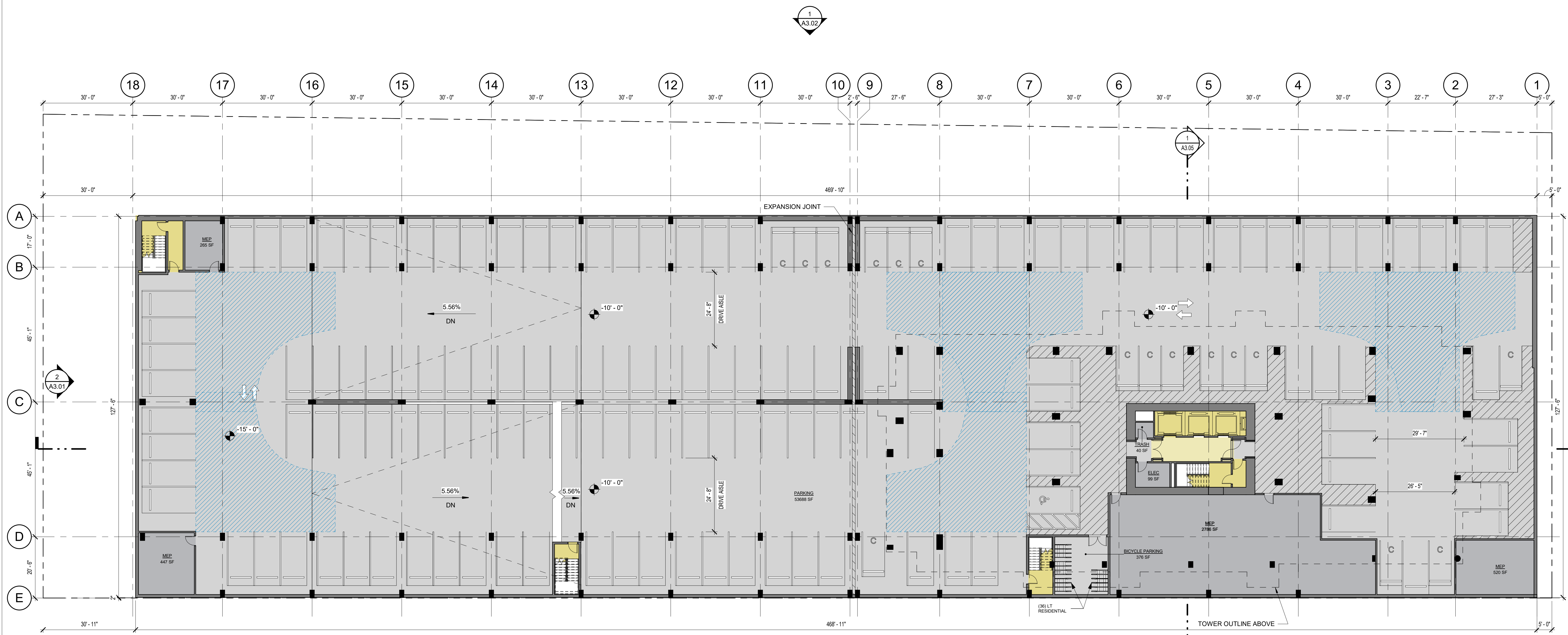
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SITE PLAN

Project Number: 2021034

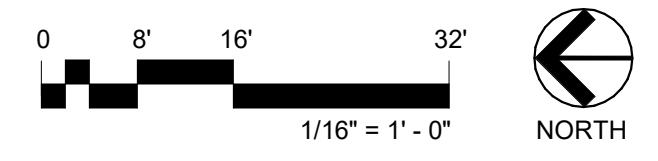
Sheet Number: **A1.01**



PARKING LEGEND

	RETAIL	RESIDENTIAL	ACCESSIBLE	TOTAL
LEVEL 03		59		59
LEVEL 02		110	4	114
LEVEL 01	28	60	4	92
LEVEL B1		146	1	147
				412

1 LEVEL B1
 SCALE: 1/16" = 1'-0"



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RIOS

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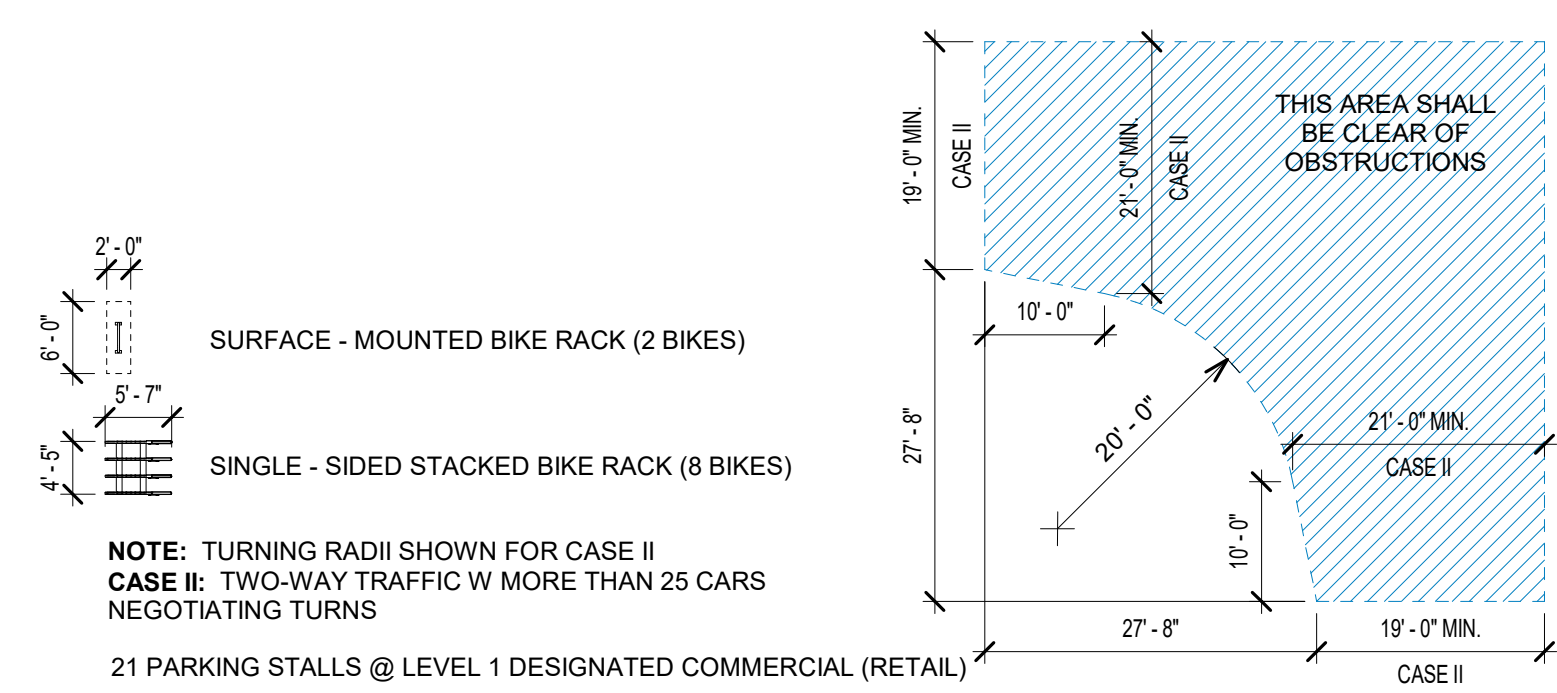
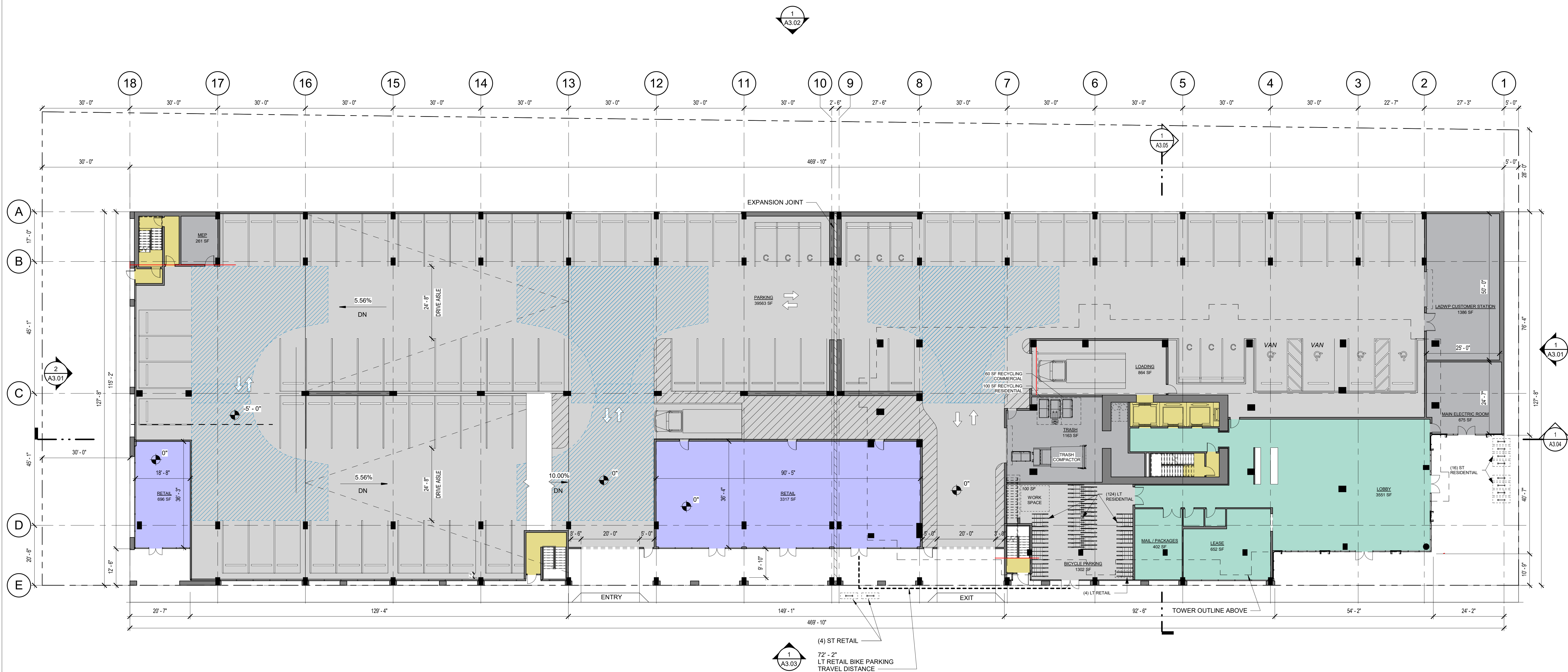
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LEVEL B1 FLOOR PLAN

Project Number: 2021034

Sheet Number: **A2.00**



PARKING LEGEND

	RETAIL	RESIDENTIAL	ACCESSIBLE	TOTAL
LEVEL 03		59		59
LEVEL 02		110	4	114
LEVEL 01	28	60	4	92
LEVEL B1		146	1	147
				412

1 LEVEL 01 FLOOR PLAN
SCALE: 1/16" = 1'-0"



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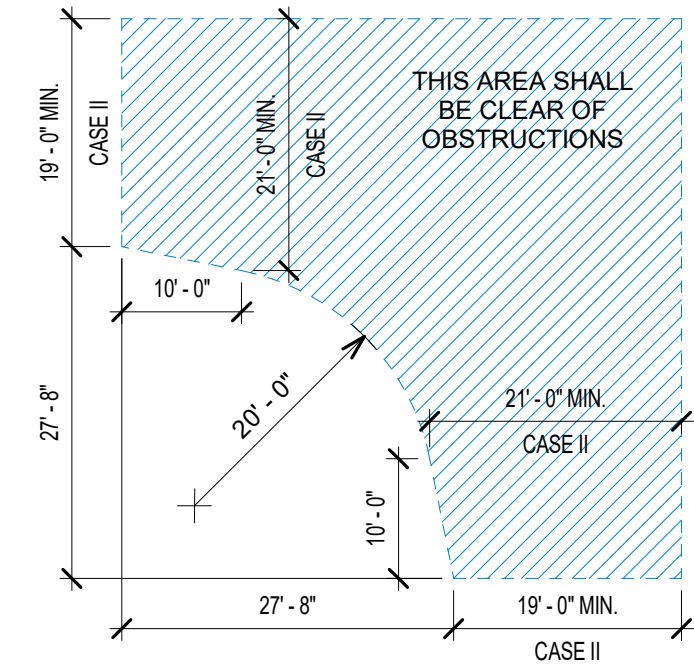
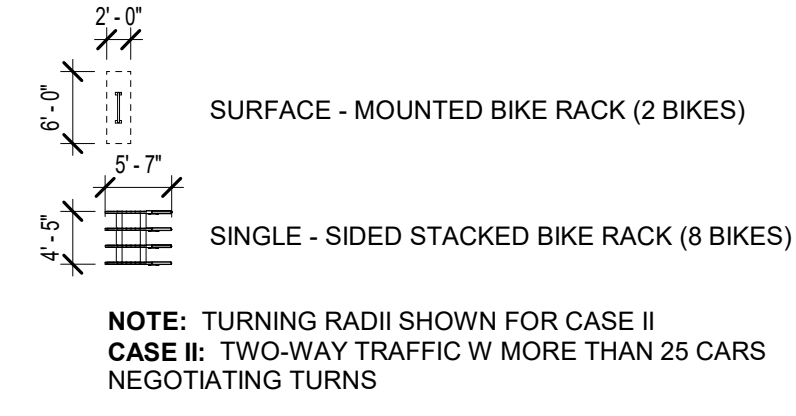
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LEVEL 01 FLOOR PLAN

Project Number: 2021034
Sheet Number: **A2.01**



PARKING LEGEND

	RETAIL	RESIDENTIAL	ACCESSIBLE	TOTAL
LEVEL 03		59		59
LEVEL 02		110	4	114
LEVEL 01	28	60	4	92
LEVEL B1		146	1	147
				412

1 LEVEL 02 FLOOR PLAN
 SCALE: 1/16" = 1'-0"
 0 8' 16' 32'
 1/16" = 1'-0" NORTH



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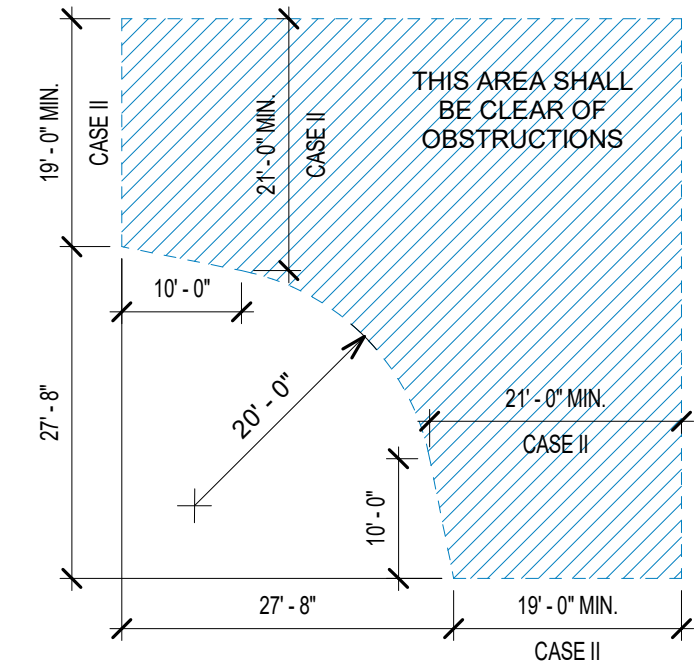
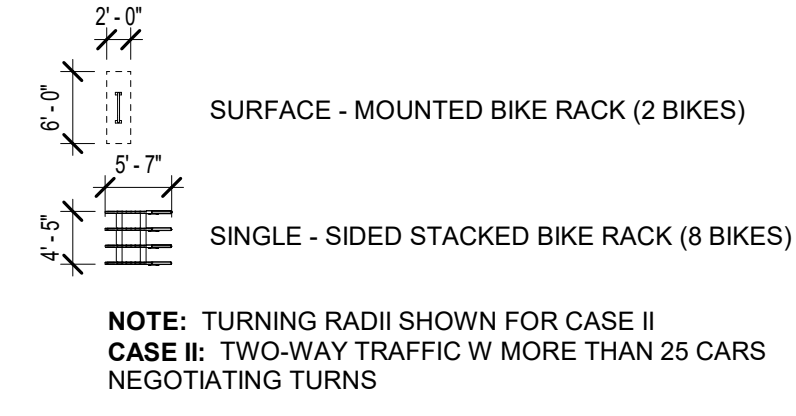
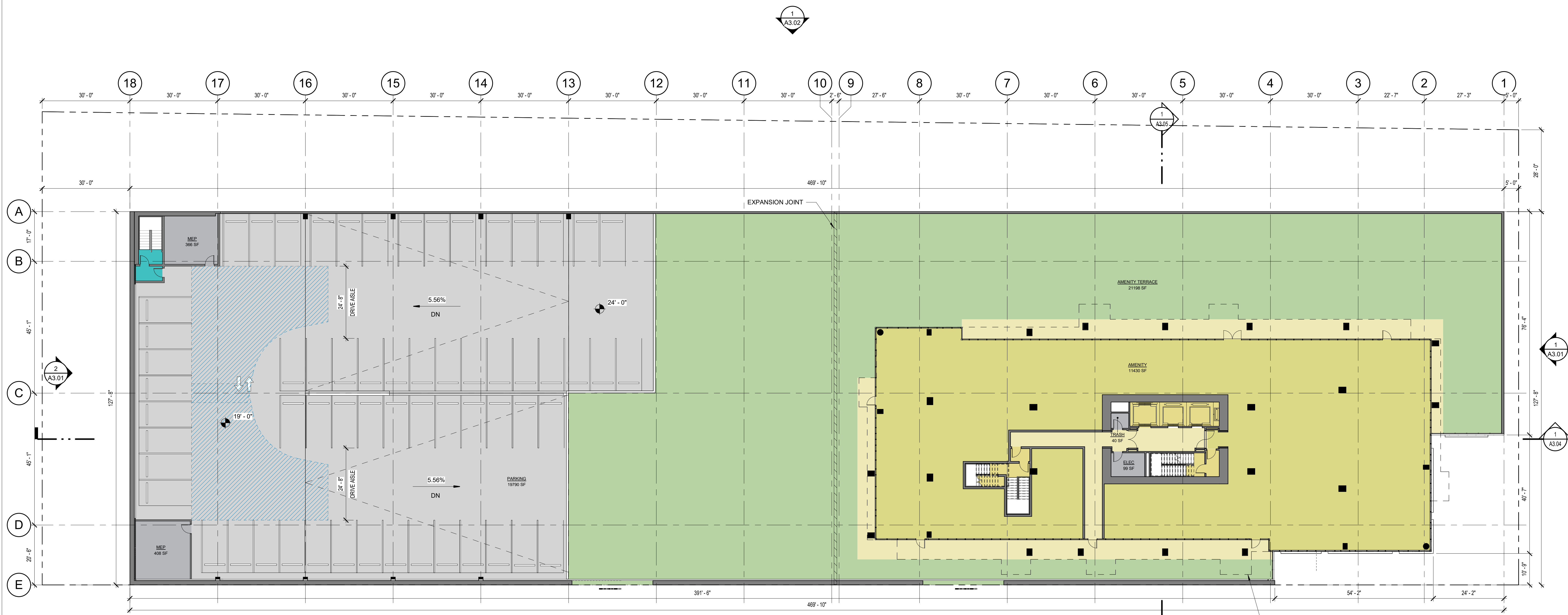
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LEVEL 02 FLOOR PLAN

Project Number: 2021034
 Sheet Number: **A2.02**



PARKING LEGEND

	RETAIL	RESIDENTIAL	ACCESSIBLE	TOTAL
LEVEL 03		59		59
LEVEL 02		110	4	114
LEVEL 01	28	60	4	92
LEVEL B1		146	1	147
				412

1 LEVEL 03 FLOOR PLAN
SCALE: 1/16" = 1'-0"



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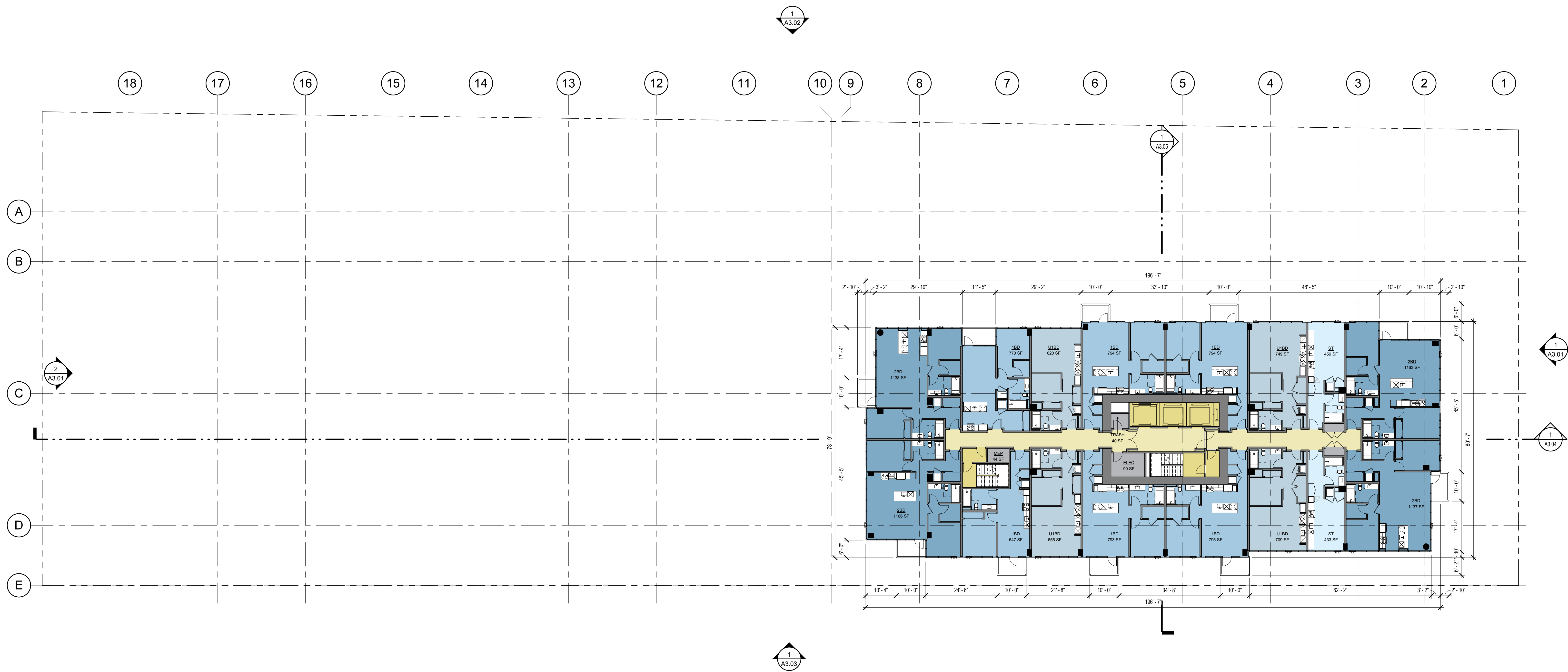
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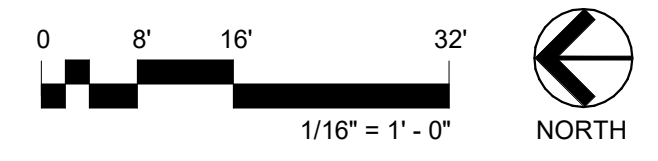
LEVEL 03 FLOOR PLAN

Project Number: 2021034

Sheet Number: **A2.03**



1 LEVELS 04-11 FLOOR PLAN
 SCALE: 1/16" = 1'-0"



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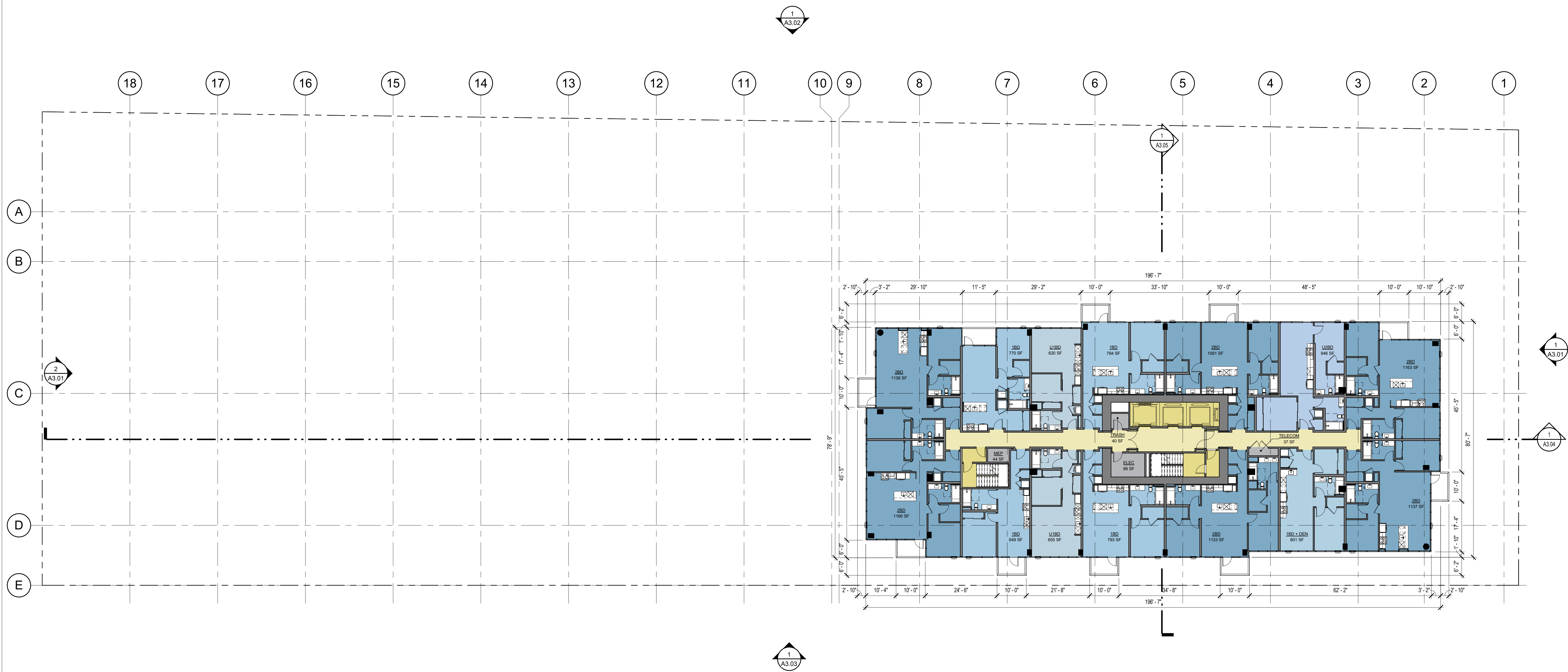
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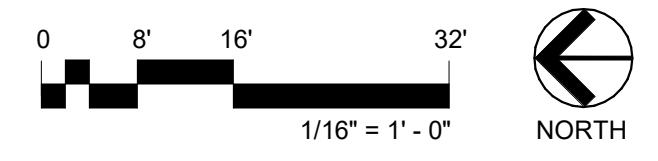
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LEVELS 04-11
FLOOR PLAN

Project Number: 2021034
 Sheet Number: **A2.04**



2 LEVELS 12-22 FLOOR PLAN
 SCALE: 1/16" = 1'-0"



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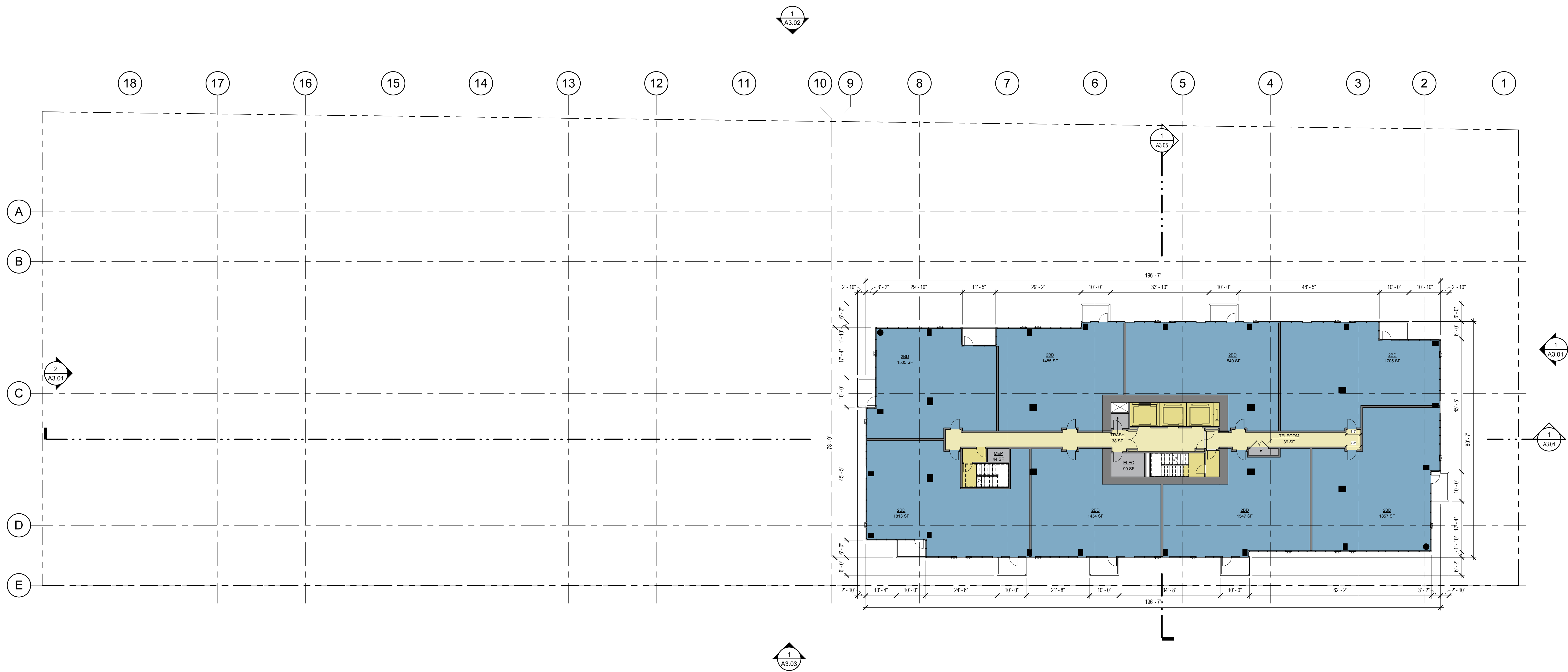
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**LEVELS 12-22
 FLOOR PLAN**

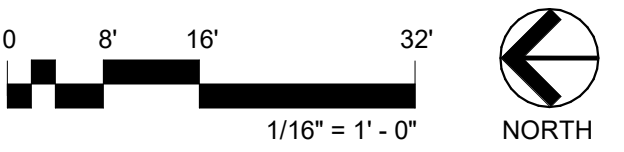
Project Number: 2021034

Sheet Number: **A2.12**



NOTE: UNITS @ LEVEL 27 COUNTED AS > 3 H.R. FOR OPEN SPACE CALCULATIONS

1 LEVEL 23 - FLOOR PLAN
SCALE: 1/16" = 1'-0"



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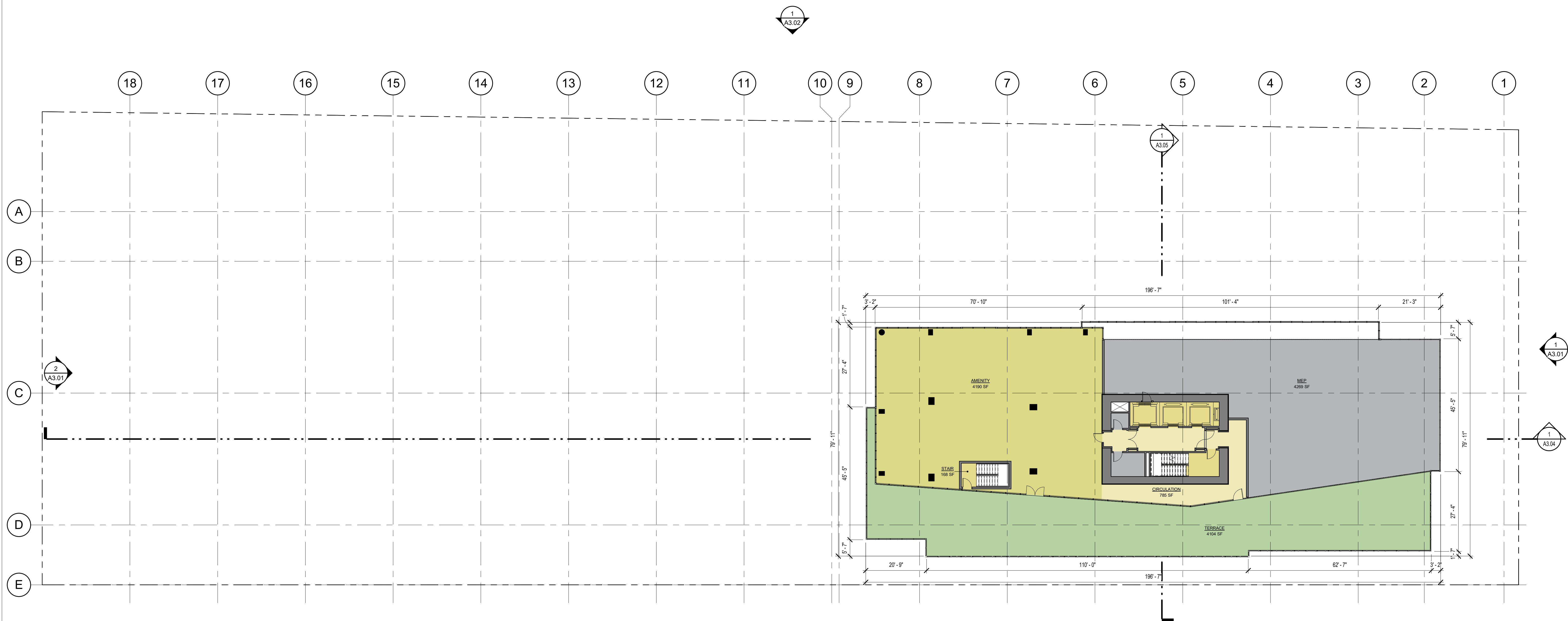
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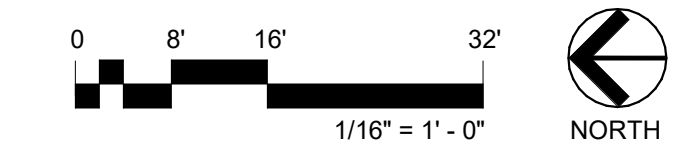
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LEVEL 23 FLOOR PLAN

Project Number: 2021034
Sheet Number: **A2.23**



1 LEVEL 24 - SKYDECK FLOOR PLAN
 SCALE: 1/16" = 1'-0"



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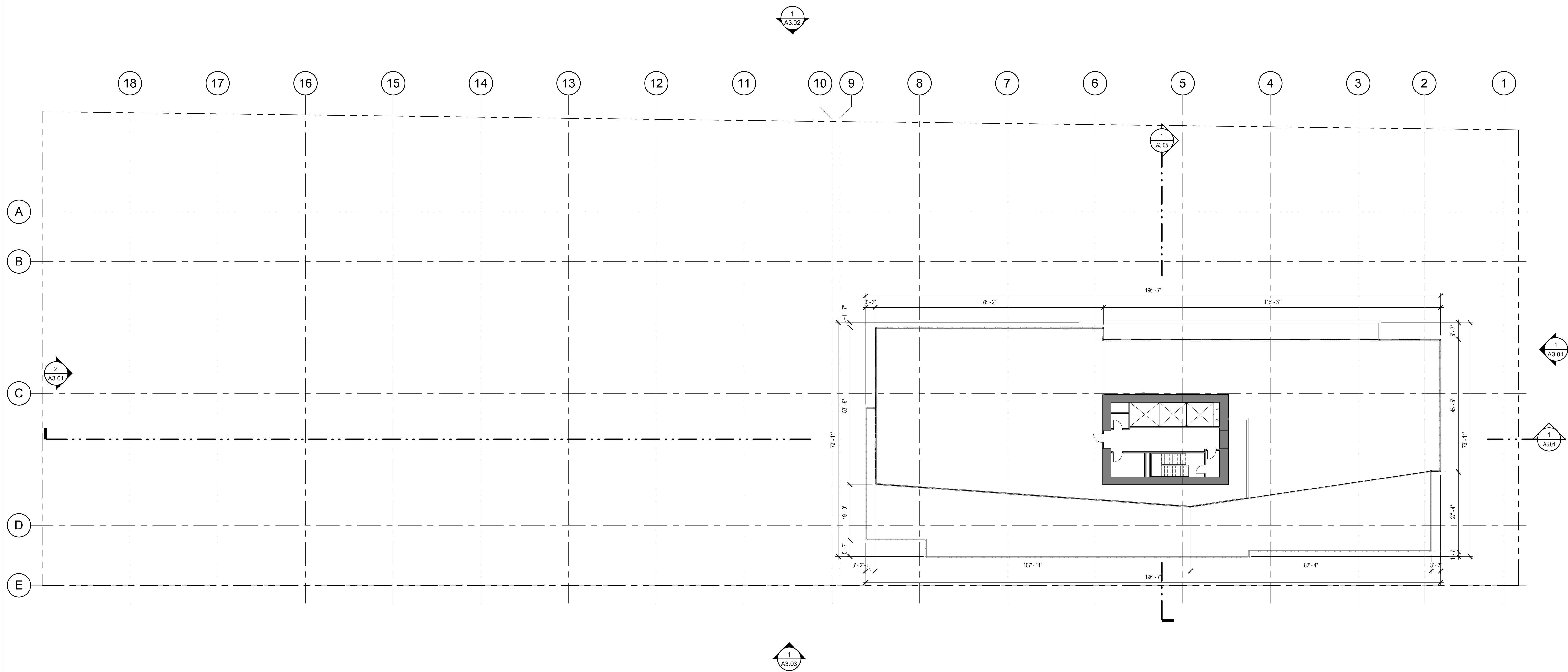
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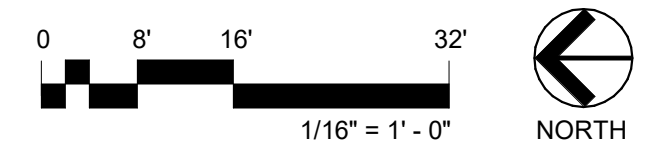
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LEVEL 24 - SKYDECK FLOOR PLAN

Project Number: 2021034
 Sheet Number: **A2.24**



1 ROOF LEVEL FLOOR PLAN
 SCALE: 1/16" = 1'-0"



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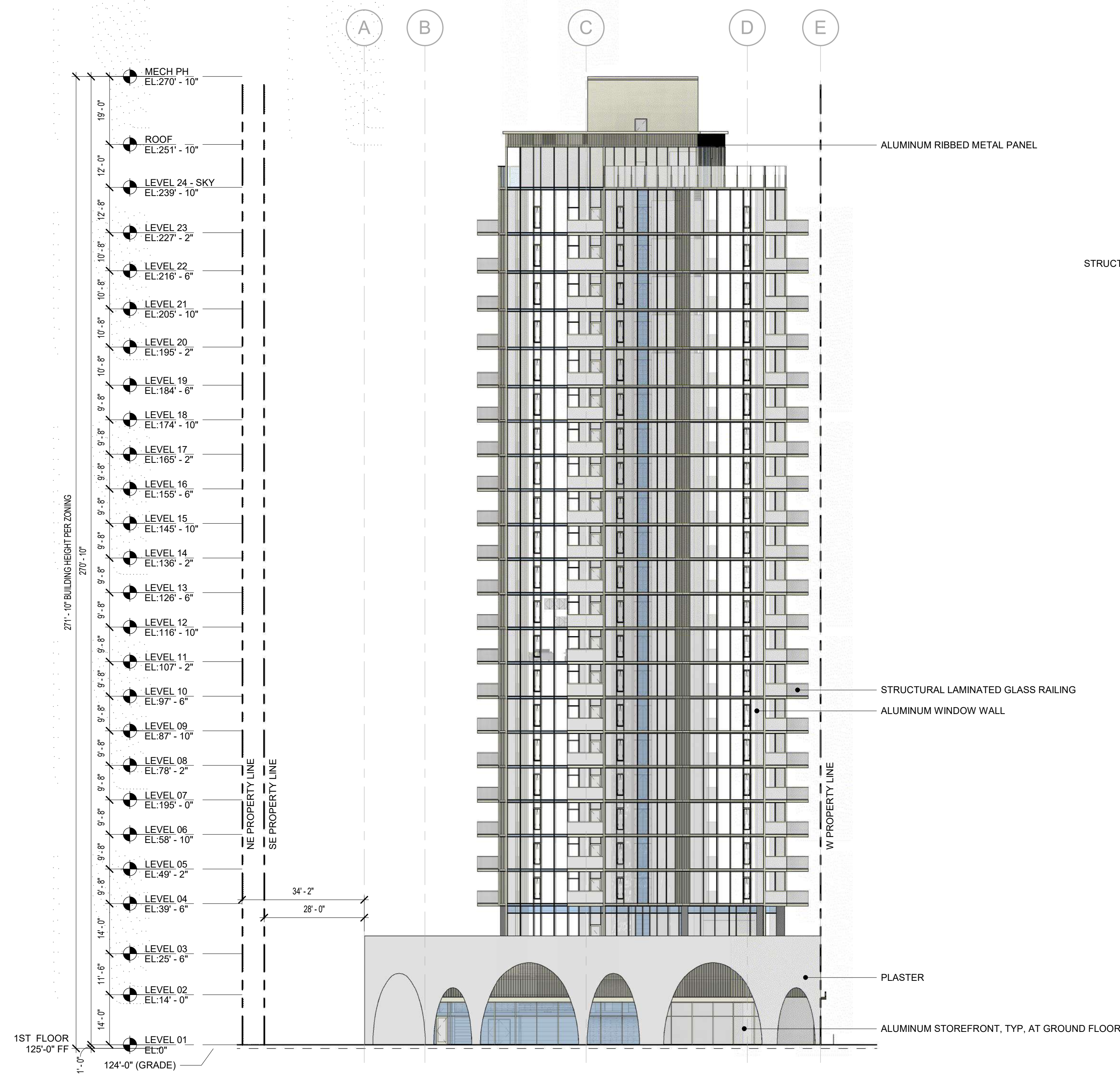
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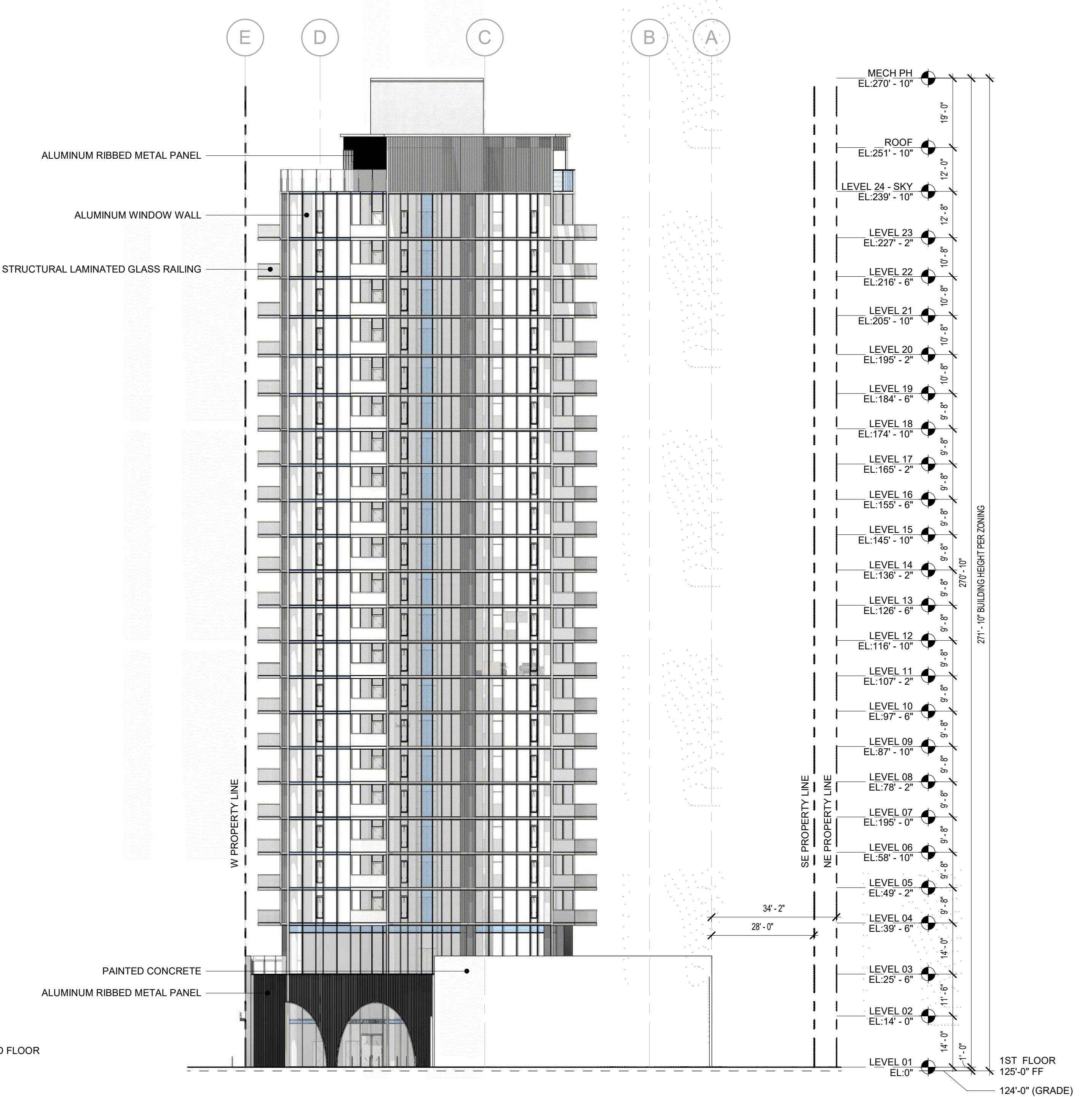
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ROOF LEVEL FLOOR PLAN

Project Number: 2021034
 Sheet Number: **A2.25**



2 BUILDING ELEVATION - NORTH
SCALE: 1" = 20'-0"



1 BUILDING ELEVATION - SOUTH
SCALE: 1" = 20'-0"

EXTERIOR FINISH LEGEND

FINISH	LOCATION
ALUMINUM - BRONZE FINISH	GROUND FLOOR STORE FRONT, TOWER WINDOW WALL, TRIM ELEMENTS
PLASTER	PODIUM EXTERIOR WALLS
STRUCTURAL LAMINATED GLASS	RAILINGS AT UNIT BALCONIES



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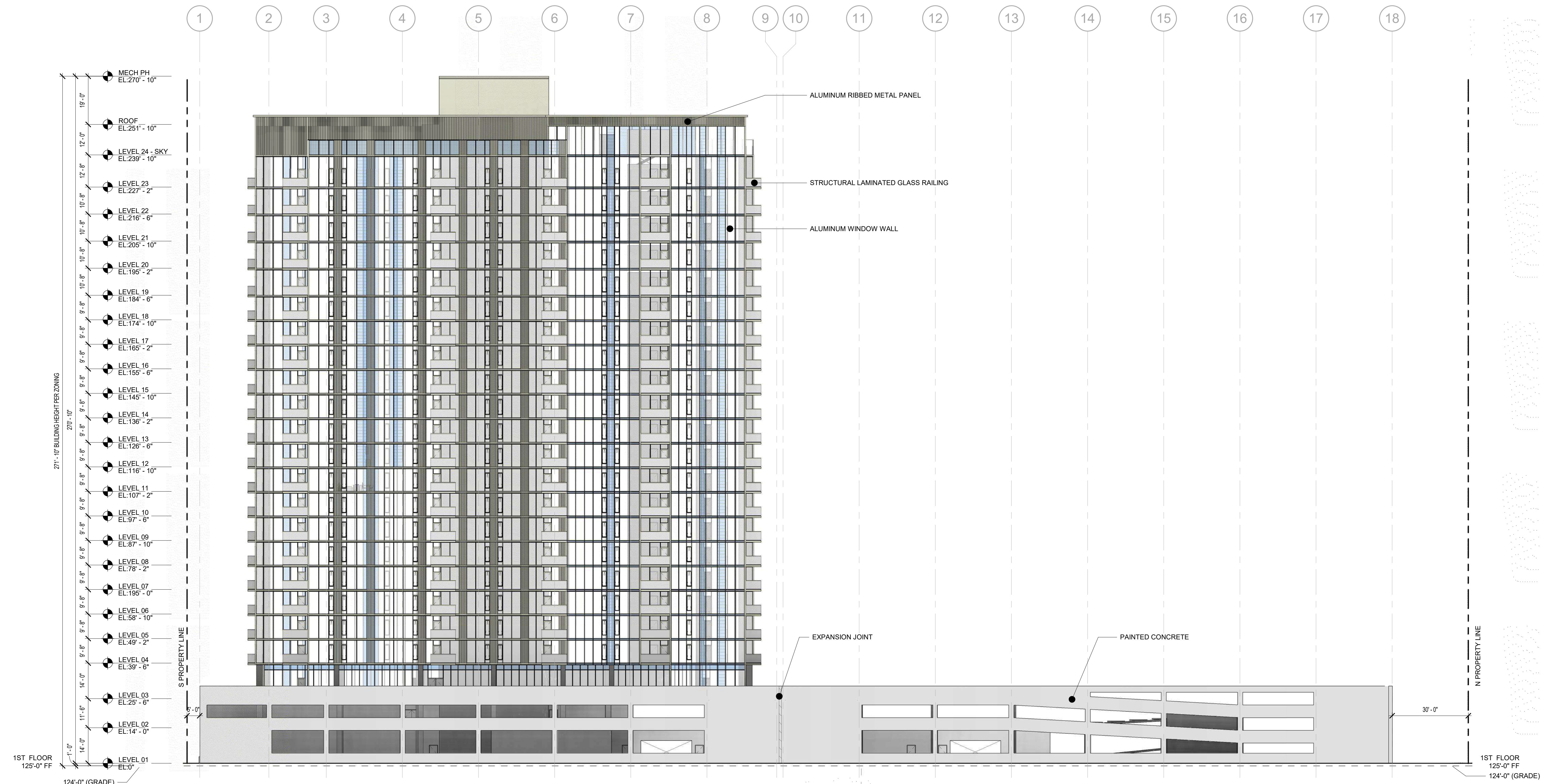
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BUILDING ELEVATIONS

Project Number: 2021034

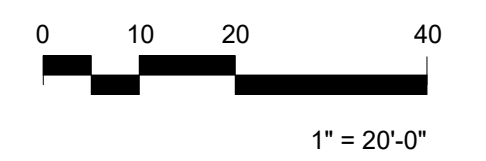
Sheet Number: **A3.01**



EXTERIOR FINISH LEGEND

FINISH	LOCATION
 ALUMINUM - BRONZE FINISH	GROUND FLOOR STORE FRONT, TOWER WINDOW WALL, TRIM ELEMENTS
 PLASTER	PODIUM EXTERIOR WALLS
 STRUCTURAL LAMINATED GLASS	RAILINGS AT UNIT BALCONIES

1 BUILDING ELEVATION - EAST
SCALE: 1" = 20'-0"



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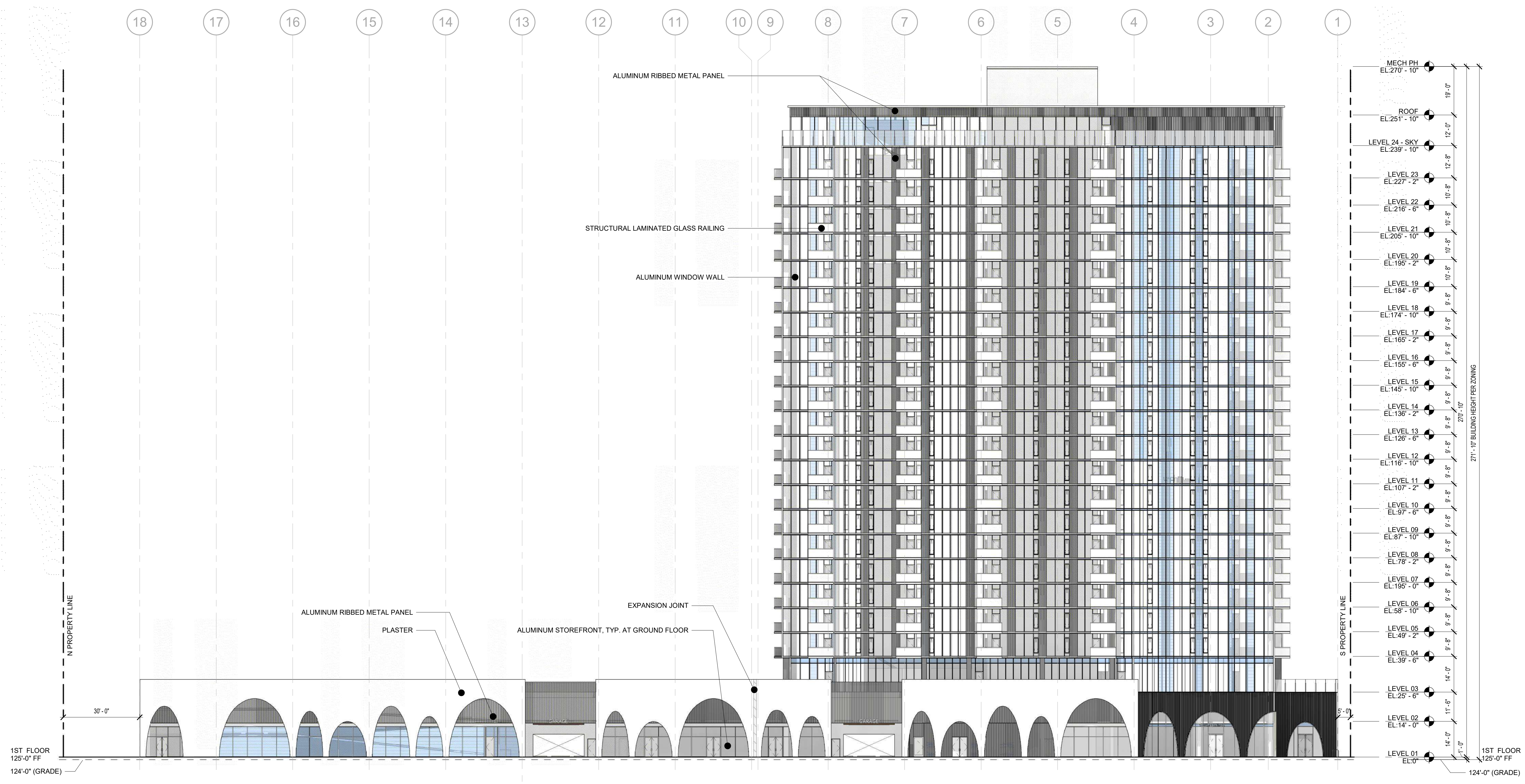
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BUILDING ELEVATIONS

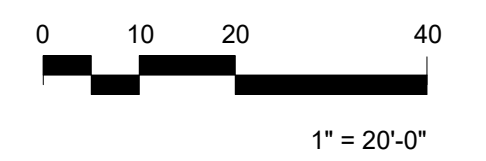
Project Number: 2021034
Sheet Number: **A3.02**



EXTERIOR FINISH LEGEND

FINISH	LOCATION
ALUMINUM - BRONZE FINISH	GROUND FLOOR STORE FRONT, TOWER WINDOW WALL, TRIM ELEMENTS
PLASTER	PODIUM EXTERIOR WALLS
STRUCTURAL LAMINATED GLASS	RAILINGS AT UNIT BALCONIES

1 BUILDING ELEVATION - WEST
SCALE: 1" = 20'-0"



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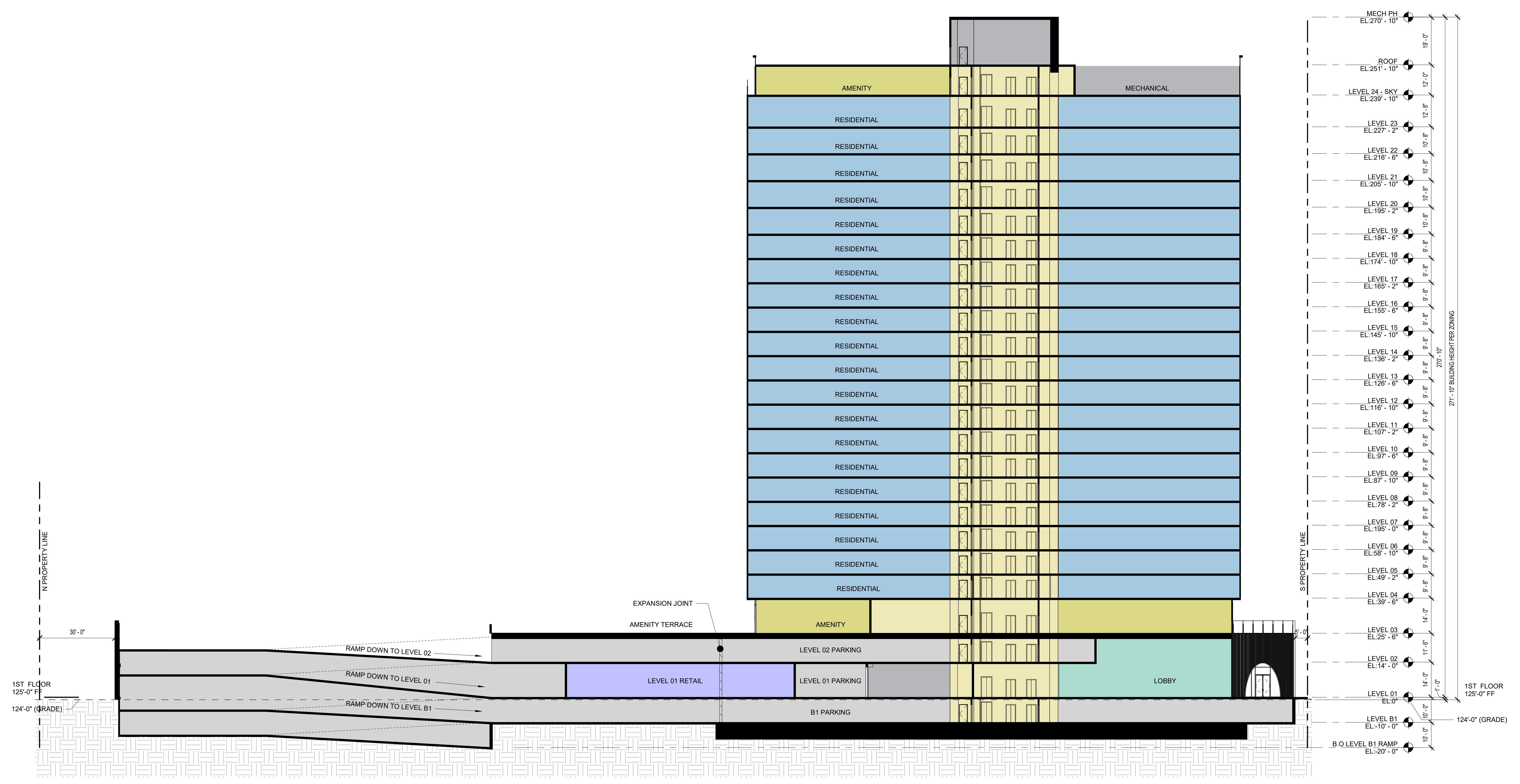
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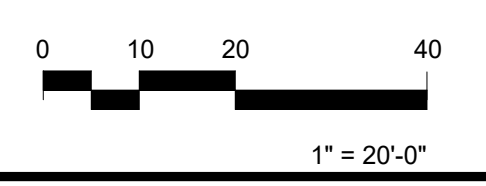
**BUILDING
ELEVATIONS**

Project Number: 2021034

Sheet Number: **A3.03**



1 BUILDING SECTION
SCALE: 1" = 20'-0"



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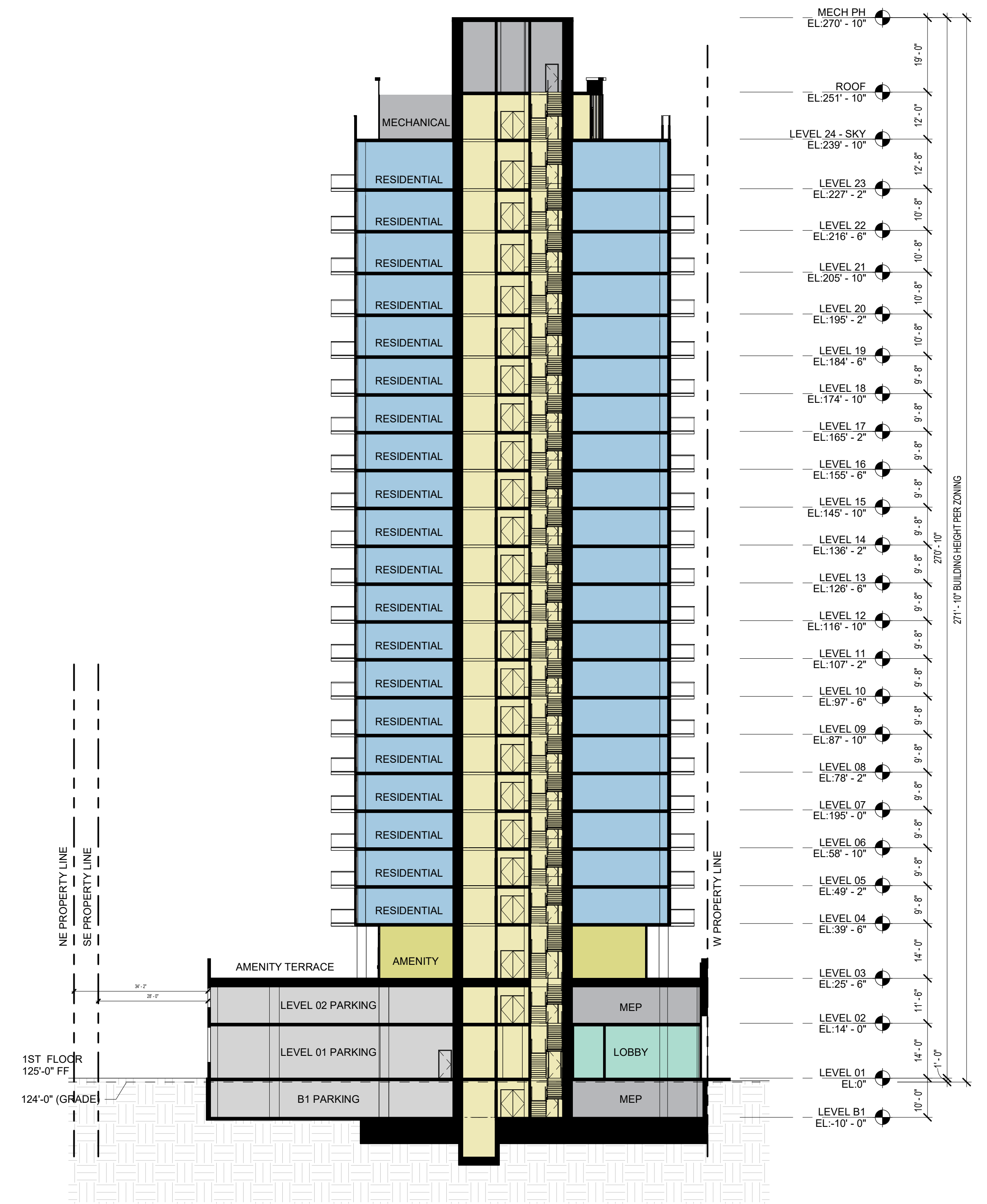
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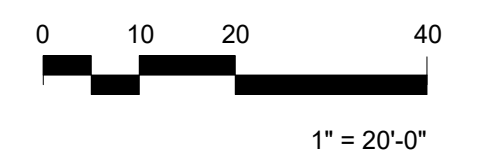
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BUILDING SECTIONS

Project Number: 2021034
Sheet Number: **A3.04**



1 BUILDING SECTION
SCALE: 1" = 20'-0"



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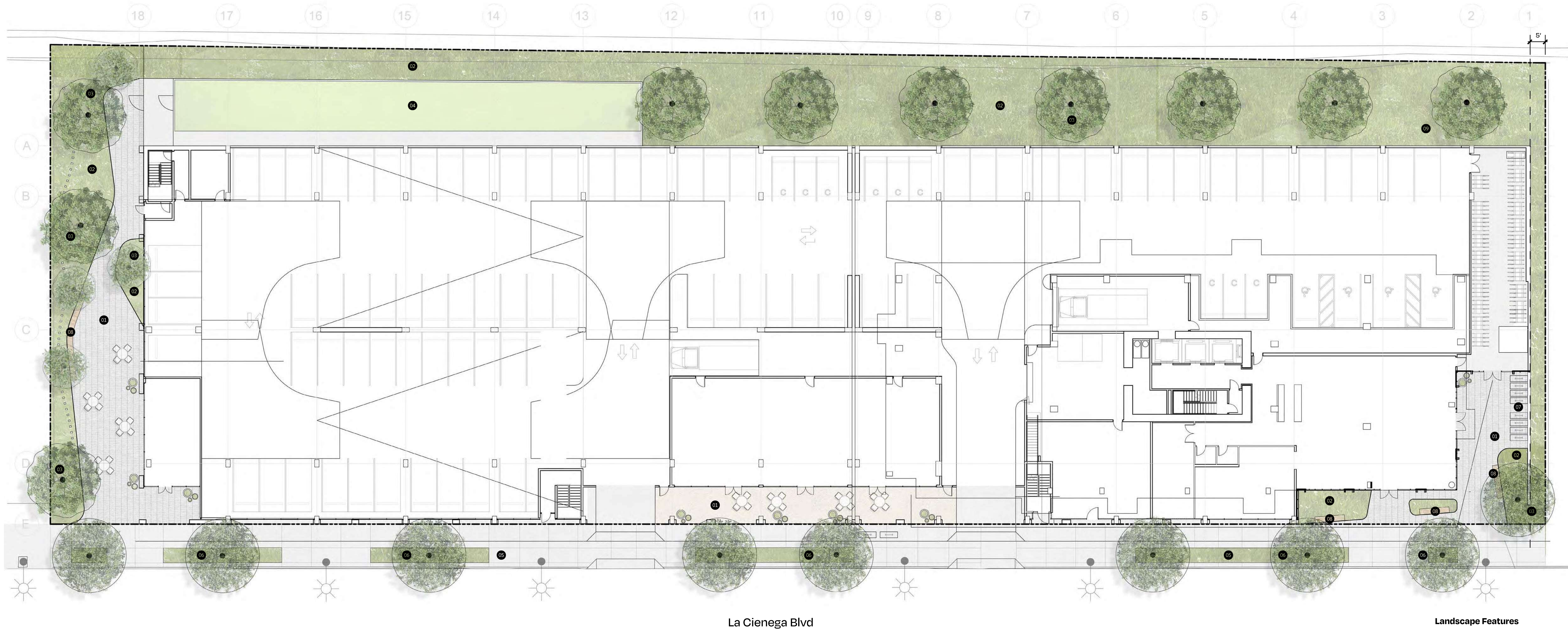
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BUILDING SECTIONS

Project Number: 2021034
Sheet Number: **A3.05**

TREE SCHEDULE

TREES	CODE	BOTANICAL NAME	COMMON NAME	SIZE	WUCOLS	QTY
	CHI LIN	CHILOPSIS LINEARIS	DESERT WILLOW	36" BOX	VERY LOW	3
	CUP ANA	CUPANIOPSIS ANACARDIODES	CARROT WOOD	48" BOX	MEDIUM	8
	PLA SYC	PLATANUS RACEMOSA	CALIFORNIA SYCAMORE MULTI-TRUNK	48" BOX	MEDIUM	4



La Cienega Blvd

Landscape Features

- 01 Hardscape Area
- 02 Planting Area
- 03 Tree, See Schedule
- 04 Dog Area
- 05 Parkway
- 06 Street Tree
- 07 Bike Stalls
- 08 Benches
- 09 Trellis



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LEVEL 1
GROUND FLOOR
PLAN

Project
Number:

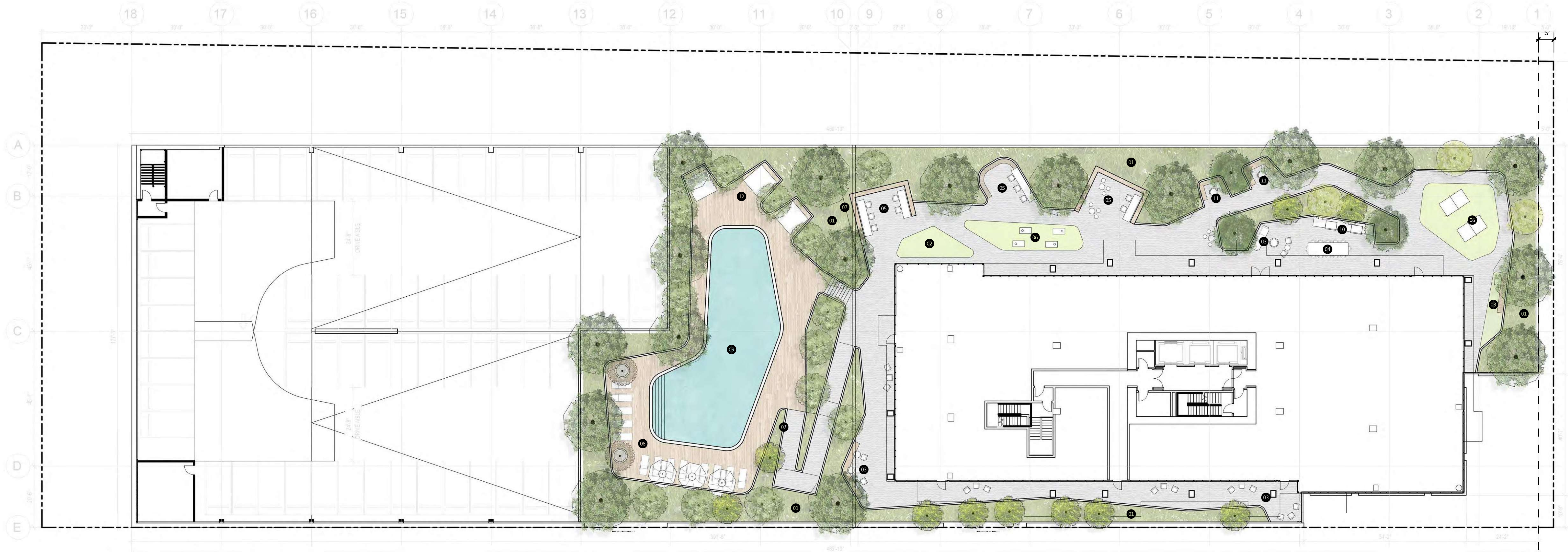
Sheet
Number:

L1.01

TREE SCHEDULE

TREES	CODE	BOTANICAL NAME	COMMON NAME	SIZE	WUCOLS	QTY
	AGO FLE	AGONIS FLEXUOSA	PEPPERMINT TREE	48" BOX	LOW	17
	ARC HUR	ARCTOSTAPHYLOS MANZANITA 'DR. HURD'	DR. HURD COMMON MANZANITA	36" BOX	LOW	3
	CEI SPE	CEIBA SPECIOSA	FLOSS SILK TREE	36" BOX		13

	PAR FLO	PARKINSONIA FLORIDA	BLUE PALO VERDE	36" BOX		2
	MEL PIN	MELALEUCA NESOPHILA	PINK MELALEUCA MULTI-TRUNK	36" BOX	LOW	3
	CHI TAS	X CHITALPA TASHKENTENSIS	CHITALPA	36" BOX		10



Landscape Features

- 01 Planting Area
- 09 Pool
- 02 Outdoor Fitness
- 10 BBQ Area
- 03 Lounge Area
- 11 Fire Lounge
- 04 Al Fresco Dining Area
- 12 Cabanas
- 05 Co-Working Spaces
-
- 06 Gaming and Relaxation Lawn
-
- 07 Pool Fence
-
- 08 Sun Deck
-



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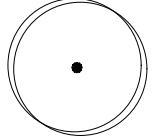
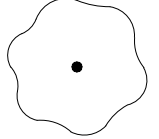
**LEVEL 3
AMENITY LEVEL
PLAN**

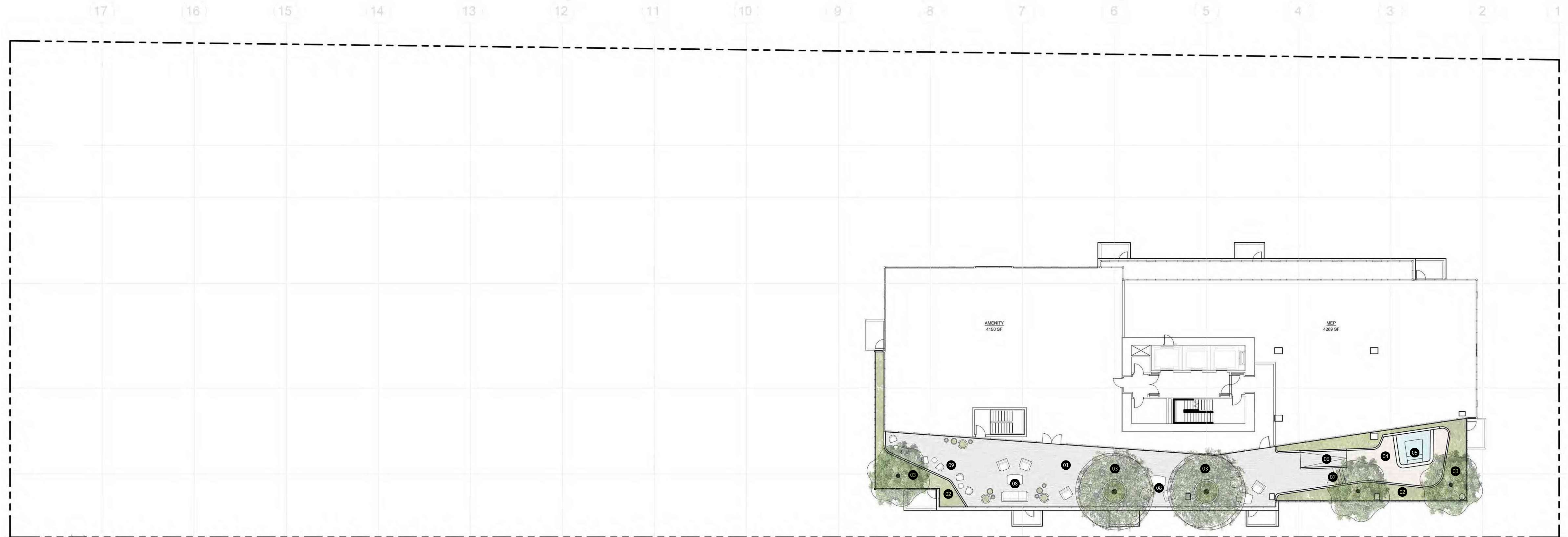
Project
Number:

Sheet
Number:

L1.03

TREE SCHEDULE

TREES	CODE	BOTANICAL NAME	COMMON NAME	SIZE	WUCOLS	QTY
	MAY MUL	MAYTENUS BOARIA	MAYTEN TREE MULTI-TRUNK	48" BOX	MEDIUM	2
	OLE WIL	OLEA EUROPAEA 'WILSONII'	WILSON OLIVE	36" BOX	LOW	3



Landscape Features

- 01 Hardscape Area
- 02 Planting Area
- 03 Tree, See Schedule
- 04 Wood Deck
- 05 Spa Pool
- 06 Ramp
- 07 Stairs
- 08 Lounge Area
- 09 Cafe Seating



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**LEVEL 24
ROOF LEVEL
AMENITY PLAN**

Project
Number:

Sheet
Number:

L1.24

Air Quality, Greenhouse Gases, Noise Analysis

noah tanski environmental consulting

email: noah@ntenvironmental.net
call/text: 310-722-6346

Date: July 17, 2023

To: Stacie Henderson
CAJA

From: Noah Tanski, Principal
NTEC

Subject: **Air Quality Impact Evaluation of the 1050 La Cienega Boulevard Project and the Revised Project**

Dear Stacie:

As requested, Noah Tanski Environmental Consulting (NTEC) has evaluated the air quality impacts that would result from construction and operations of the Revised 1050 La Cienega Boulevard Project (Revised Project) and compared them to impacts that were estimated for the version of the Project addressed by the 1050 La Cienega Boulevard Project Sustainable Communities Environmental Assessment (SCEA Project). The SCEA Project proposes to construct a 28-story mixed-use high-rise building consisting of 290 residential units and 7,500 square feet of ground floor commercial space. The Revised Project proposes moving the tower structure south on the Site, reducing its height by 4 stories to 24 stories, reducing the commercial space by 2,240 square feet to 5,260 square feet, and reducing the soil export amount by 3,243 cubic yards to 45,670 cubic yards.

The evaluation accounts for factors such as the South Coast Air Quality Management District's (SCAQMD) latest 2022 Air Quality Management Plan (2022 AQMP) and updates to the CalEEMod emissions modeling software, in addition to the minor differences between the two projects. Overall, air quality impacts associated with the Revised Project would remain less than significant. This memorandum presents my analysis and findings.

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

The SCEA concluded that the SCEA Project would not conflict with or obstruct implementation of the SCAQMD's 2016 Air Quality Management Plan (2016 AQMP), which was the latest AQMP in effect at the time of the SCEA's publication on September 8, 2022. The SCEA also concluded that the SCEA Project would not conflict with the applicable goals and policies of the City's General Plan Air Quality Element.

Since the SCEA's publication, SCAQMD has adopted the 2022 AQMP. The Revised Project would be consistent with the 2022 AQMP for the same reasons that the SCEA Project was determined to be consistent with the prior 2016 AQMP. First, like the SCEA Project, the Revised Project would be consistent with the region's current 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy

(2020-2045 RTP/SCS) and its smart growth strategies to increase housing density in high quality transit areas (HQTAs). Therefore, growth related to the Revised Project would be consistent with 2022 AQMP projections that are themselves based on 2020-2045 RTP/SCS projections. Second, and for similar reasons, the Revised Project would be consistent with the latest regional land use planning strategies to reduce vehicle miles traveled (VMT) and associated air emissions. Third, as demonstrated later by this memorandum, neither construction nor operations of the Revised Project would exceed or substantially contribute to an exceedance of ambient air quality standards and thresholds. Therefore, the Revised Project would not interfere with or obstruct the 2022 AQMP’s attainment of air quality standards or interim emissions reductions.

Regarding the City’s Air Quality Element, the Revised Project and its land uses are substantially similar to the SCEA Project and would therefore be consistent with the goals and policies of the Air Quality Element for the same reasons as the SCEA Project. Table III-3 of the SCEA contains an assessment of the SCEA Project’s consistency with the Air Quality Element.

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

Construction

The SCEA concluded that the SCEA Project’s construction-related emissions would not exceed SCAQMD regional significance thresholds or localized significance thresholds (LSTs). To estimate these emissions, the SCEA analysis utilized CalEEMod version 2020.4.0, which was the latest version of this emissions modeling software at the time of the analysis.

The Revised Project and its land uses are mostly similar to the SCEA Project. There are minor differences in square footage, and the Revised Project would require somewhat less soil export (45,670 cubic yards versus 48,913 cubic yards), but it is estimated that construction of the Revised Project would ultimately require similar construction equipment performing similar tasks for similar periods of time as the SCEA Project. The same SCAQMD regional thresholds and LSTs would apply to the Revised Project. To estimate emissions associated with construction of the Revised Project, the latest version of CalEEMod was utilized, version 2022.1.1.14. Results of the CalEEMod analysis are shown below in **Table 1**. The SCEA Project’s maximum regional and localized emissions are also included for comparison.

Table 1
Revised Project: Maximum Regional and Localized Daily Construction Emissions

	Emissions in lbs per day					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Maximum Regional Emissions						
2024	2.59	45.1	34.9	0.24	10.5	3.25
2025	2.45	13.3	33.0	0.04	4.83	1.40
2026	17.6	14.8	49.0	0.04	8.09	2.16
Maximum Regional Emissions	17.6	45.1	49.0	0.24	10.5	3.25
<i>Regional Daily Threshold</i>	75	100	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
<i>SCEA Project Maximum Regional Emissions</i>	19.0	66.5	35.3	0.3	5.0	2.5

Increase?	No	No	Yes	No	Yes	Yes
Localized Emissions						
Excavation	1.78	16.2	19.3	0.03	2.45	1.56
Excavation – Haul Day	0.36	2.83	6.53	0.01	0.24	0.15
Pile Installation	1.06	9.84	11.2	0.03	0.40	0.37
Building Construction (2024)	1.18	10.1	11.1	0.02	0.40	0.37
Building Construction (2025)	1.11	9.53	11.0	0.02	0.35	0.33
Building Construction (2026)	1.05	9.07	10.9	0.02	0.31	0.29
Architectural Coatings and Building Construction Overlap (2026)	15.51	10.21	12.41	0.02	0.34	0.32
Architectural Coatings (2026)	14.46	1.14	1.51	<0.01	0.03	0.03
Maximum Localized Emissions	15.51	16.2	19.3	0.03	2.45	1.56
<i>Localized Significance Threshold^A</i>	-	103	562	-	4	3
Exceed Threshold?	-	No	No	-	No	No
<i>SCEA Project Maximum Localized Emissions</i>	17.3	14.5	17.2	<0.1	3.1	1.9
Increase?	No	Yes	Yes	No	No	No
^A Localized significance thresholds (LSTs) assumes the following: <ul style="list-style-type: none"> • 1-acre maximum daily disturbed acreage. This is the smallest project size used for analysis in the LST guidance document and is consistent with the SCAQMD’s “Fact Sheet for Applying CalEEMod to Localized Significance Thresholds” document. Utilizing a 1-acre project size for construction results in the most stringent emissions thresholds. • 25-meter (82-foot) receptor distance, which corresponds with distances to the nearest sensitive receptors. This is the shortest distance used for analysis in the LST guidance document, and it results in the most stringent emissions thresholds. • The Project is located in SRA No. 2, “Northwest Coastal Los Angeles County.” 						
Source: NTEC, 2023; SCAQMD, Air Quality Significance Thresholds, revised March 2023; and, SCAQMD, LST Methodology Appendix C – Mass Rate LST Look-Up Table, October 2009.						

Similar to the SCEA Project, the Revised Project’s construction-related emissions would be below SCAQMD regional thresholds and LSTs. Compared to the SCEA Project, construction of the Revised Project is estimated to result in lower localized emissions of VOC, SO_x, PM₁₀, and PM_{2.5}; lower regional emissions of VOC, NO_x, and SO_x; but nominally higher regional emissions of CO, PM₁₀, and PM_{2.5} and localized emissions of NO_x and CO. Variations in emissions are likely the result of changes in modeling assumptions and methodologies between CalEEMod version 2020.4.0 and CalEEMod version 2022.1.1.14. As explained, construction of the Revised Project would be substantially similar to construction of the SCEA Project and would involve less export overall. But in any case, construction-related emissions for the Revised Project would be below SCAQMD regional thresholds and LSTs and therefore a less than significant impact.

Operations

The SCEA concluded that the SCEA Project’s operational emissions would not exceed SCAQMD regional significance thresholds or LSTs. To estimate these emissions, the SCEA analysis utilized CalEEMod version 2020.4.0, which was the latest version of this emissions modeling software at the time of the analysis.

The Revised Project and its land uses are mostly similar to the SCEA Project. As noted, there are minor differences in square footage. And, notably, the tower would be shifted to the south of the project site, But these and other considerations would have a nominal effect on operational emissions associated with the Revised Project. The same SCAQMD regional thresholds and LSTs would also apply to the Revised Project. To estimate emissions associated with operations of the Revised Project, the latest version of CalEEMod was utilized, version 2022.1.1.14. Results of the CalEEMod analysis are shown below in **Table 2**. The Revised Project’s maximum regional and localized operational emissions are also included for comparison.

Table 2
Revised Project: Maximum Regional and Localized Operational Emissions

Emissions Source	Emissions in lbs per day					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area	11.9	0.23	24.7	<0.01	0.02	0.02
Energy	0.01	0.13	0.11	<0.01	0.01	0.01
Mobile Sources	6.63	5.15	53.8	0.12	11.6	2.99
Maximum Regional Emissions^A	18.5	5.06	78.6	0.13	11.6	3.02
<i>Regional Daily Thresholds</i>	55	55	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
<i>SCEA Project Maximum Regional Emissions</i>	15.9	7.3	78.8	0.1	12.8	3.6
Increase?	Yes	No	No	Yes	No	No
Maximum Localized Emissions	11.91	0.36	24.81	0.01	0.03	0.03
<i>Localized Significance Thresholds^B</i>	-	103	562	-	1	1
Exceed Threshold?	-	No	No	-	No	No
<i>SCEA Project Maximum Localized Emissions</i>	9.8	0.3	23.9	<0.1	0.1	0.1
Increase?	Yes	Yes	Yes	No	No	No

^A Some figures may not add up properly due to rounding and summer/winter emissions differences.

^B LSTs assumed the following:

- 1-acre project size, which is the smallest project size used for analysis in the LST guidance document. Utilizing a 1-acre project size for operations results in the most stringent emissions thresholds. Given that the actual size of the Project Site is 1.83 acres, this is a conservative assumption.
- 25-meter (82-foot) receptor distance, which corresponds with distances to the nearest sensitive receptors. This is the shortest distance used for analysis in the LST guidance document, and it results in the most stringent emissions thresholds.
- The Project is located in SRA No. 2, “Northwest Coastal Los Angeles County.”

Source: NTEC, 2023; SCAQMD, Air Quality Significance Thresholds, revised March 2023; and, SCAQMD, LST Methodology Appendix C – Mass Rate LST Look-Up Table, October 2009.

Similar to the SCEA Project, the Revised Project's operational emissions would be below SCAQMD regional thresholds and LSTs. Compared to the SCEA Project, operations of the Revised Project is estimated to result in lower regional emissions of NO_x, CO, PM₁₀, and PM_{2.5}; lower localized emissions of SO_x, PM₁₀, and PM_{2.5}; but nominally higher localized emissions of VOC, NO_x, and CO and regional emissions of VOC and SO_x. Like construction, variations in emissions are more likely the result of changes in modeling assumptions and methodologies between CalEEMod version 2020.4.0 and CalEEMod version 2022.1.1.14 than differences between the two projects. But in any case, operational emissions of the Revised Project would be below SCAQMD regional thresholds and LSTs and therefore a less than significant impact.

3. Would the Revised Project expose sensitive receptors to substantial pollutant concentrations?

Construction

The SCEA concluded that the SCEA Project's less than significant construction emissions that are below SCAQMD regional thresholds and LSTs would not expose nearby sensitive receptors generally located within 25 meters or farther from the project site to substantial criteria pollutant concentrations that would present a public health concern.

Similarly, the Revised Project's less than significant construction emissions also would not expose nearby sensitive receptors to substantial criteria pollutant concentrations that would present a public health concern.

Regarding diesel particulate matter (diesel PM) and health risk assessments (HRAs), the SCEA notes the various considerations that demonstrate why construction of the SCEA Project would not result in significant health risks from diesel PM or other toxic air contaminants (TACs). For example, construction of the SCEA Project would be only approximately 32 months and the SCEA Project's maximum daily PM₁₀ emissions, which include exhaust PM, would not exceed regional thresholds and LSTs. The SCEA also explains that the SCEA Project is not obligated to provide a quantitative HRA, but it nevertheless included a construction HRA for informational purposes demonstrating that carcinogenic risk and noncarcinogenic hazard estimates for the maximum exposed sensitive receptors would not exceed applicable significance thresholds.

A construction HRA for the Revised Project is similarly not a requirement, though the same factors (i.e., duration of construction, maximum PM₁₀ emissions, etc.) support that it also would not result in significant health risks from diesel PM or other TACs.

Operation

The SCEA concluded that the SCEA Project's less than significant operational emissions that are below SCAQMD regional thresholds and LSTs would not expose sensitive receptors to substantial criteria pollutant concentrations that would present a public health concern. It also noted that the SCEA Project would not warrant the need for a health risk assessment because it would not include typical sources of TACs, such as industrial manufacturing processes, automotive repair facilities, or warehouse distribution facilities. As such, operations-related TAC emissions would reasonably result in less than significant health risks. For the same reasons, operations of the Revised Project, which proposes essentially the same land

uses as the SCEA Project and would result in similar VMT, also would result in less than significant health risks.

For the same reasons described in the SCEA, the Revised Project also would not cause or substantially contribute to the formation of CO hotspots or other exceedances of CO air quality standards.

4. Would the Revised Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

The SCEA concluded that the SCEA Project includes housing and commercial land uses that are not typically associated with unpleasant odors and local nuisances, such as rendering facilities and dry cleaners. SCAQMD Rule 402 would regulate any occasional odors associated with on-site uses, such as restaurants and residences, but overall odor impacts from the SCEA Project would be less than significant. For the same reasons, the Revised Project also would not result in significant odor impacts.

5. Cumulative Impacts

As explained in the SCEA, individual projects that would not generate emissions in excess of SCAQMD significance thresholds would not contribute considerably to any potential cumulative impact. Therefore, like the SCEA Project, because the Revised Project would not generate emissions in exceedance of SCAQMD significance thresholds, it also would not contribute considerably to any potential cumulative impact. Construction and operational emissions associated with the Revised Project would be similar to and no more than nominally greater than the SCEA Project's construction and operational emissions.

Air Quality, Greenhouse Gases, Noise Analysis

noah tanski environmental consulting

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Date: July 31, 2023
To: Stacie Henderson
CAJA
From: Noah Tanski, Principal
NTEC
Subject: **Greenhouse Gas Impact Evaluation of the 1050 La Cienega Boulevard Project and the Revised Project**

Dear Stacie:

As requested, Noah Tanski Environmental Consulting (NTEC) has evaluated the greenhouse gas (GHG) impacts that would result from construction and operations of the Revised 1050 La Cienega Boulevard Project (Revised Project) and compared them to impacts that were estimated for the version of the Project addressed by the 1050 La Cienega Boulevard Project Sustainable Communities Environmental Assessment (SCEA Project). The SCEA Project proposes to construct a 28-story mixed-use high-rise building consisting of 290 residential units and 7,500 square feet of ground floor commercial space. The Revised Project proposes moving the tower structure south on the Site, reducing its height by 4 stories to 24 stories, reducing the commercial space by 2,240 square feet to 5,260 square feet, and reducing the soil export amount by 3,243 cubic yards to 45,670 cubic yards.

The evaluation accounts for factors such as the California Air Resources Board's (CARB) latest 2022 Climate Change Scoping Plan (2022 Scoping Plan) and recent updates to the CalEEMod emissions modeling software, in addition to the minor differences between the two projects. Overall, GHG impacts associated with the Revised Project would remain less than significant. This memorandum presents my analysis and findings.

- 1. Would the Revised Project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?**
- 2. Would the Revised Project conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHG emissions?**

Executive Order S-3-05 and AB 32; AB 32 Scoping Plan and First Update; Executive Order B-30-15, SB 32, and the 2017 Scoping Plan

The SCEA concludes that the SCEA Project would be consistent with these plans, policies, and regulations to reduce statewide GHG emissions. The Revised Project proposes the development of the same land uses (i.e., a mixed-use residential high rise) at the same site that would be serviced by the same high quality transit facilities, energy providers, and other services. Thus, for the same reasons discussed in the SCEA,

the Revised Project would also be consistent with these plans, policies, and regulations to reduce statewide GHG emissions.

2020-2045 RTP/SCS

The SCEA concludes that the SCEA Project would be consistent with the 2020-2045 RTP/SCS, which emphasizes concentrating new, dense housing and mixed-uses in infill locations and high quality transit areas (HQTA) in an effort to facilitate alternative transportation modes and reduce vehicle trips and VMT. Not only would the SCEA Project be located within a HQTA and along a Livable Corridor, but the SCEA Project also qualifies as a TOC Tier 3 site based on its proximity to high quality bus stops and a future D Line station at the intersection of Wilshire Boulevard and La Cienega Boulevard. The SCEA Project would also be located within a “Pedestrian Enhanced District” (per the City’s Mobility Plan 2035), meaning that the SCEA Project would be located in a district that the City has identified and targeted for prioritized pedestrian improvements and funding. Additionally, the SCEA notes that the SCEA Project would result in a daily average household VMT per capita that is over 30 percent below the Area Planning Commission’s average, which would substantially exceed the 2020-2045 RTP/SCS’s objective of reducing daily VMT per capita by 5 percent by 2045 across the SCAG region.

The Revised Project proposes the development of the same land uses (i.e., a mixed-use residential high rise) at the same site that would be serviced by the same high quality transit facilities. VMT associated with the Revised Project would be similar to the SCEA Project and also well below the 2020-2045 RTP/SCS’s VMT reduction targets. Thus, for the same reasons discussed in the SCEA, the Revised Project would also be consistent with the 2020-2045 RTP/SCS.

Los Angeles Mobility Plan 2035 and Sustainable City pLAn/Green New Deal

The SCEA concludes that the SCEA Project would be consistent with these local plans to reduce GHG emissions. As explained, the Revised Project proposes the development of the same land uses at the same site as the SCEA Project that would be serviced by the same high quality transit facilities, energy providers, and other services. There are no new factors that would affect the Revised Project’s consistency with these plans. Thus, for the same reasons discussed in the SCEA, the Revised Project would also be consistent with these local planning efforts to reduce GHG emissions.

Executive Order B-55-18, AB 1279, and the 2022 Scoping Plan

Since the SCEA’s publication, CARB has adopted the 2022 Scoping Plan, which addresses the latest climate-related legislation and direction from current Governor Gavin Newsom, who, by his signing of AB 1279, required the State to reduce statewide anthropogenic GHG emissions to at least 85 percent below 1990 levels by 2045 and to maintain net negative GHG emissions thereafter. In short, the 2022 Scoping Plan establishes a scenario by which the State may achieve carbon neutrality by 2045 or earlier.

The 2022 Scoping Plan is the most comprehensive and far-reaching Scoping Plan developed to date. It identifies a technologically feasible, cost-effective, and equity-focused path to achieve the aforementioned targets, while also assessing the progress California is making toward reducing its GHG emissions by at least 40 percent below 1990 levels by 2030, as called for in SB 32 and laid out in the 2017 Scoping Plan. The 2030 target is an interim but important stepping stone along the critical path to the broader goal of deep decarbonization by 2045. The relatively longer path assessed in the 2022 Scoping Plan incorporates, coordinates, and leverages many existing and ongoing efforts to reduce GHGs and air

pollution, while identifying new clean technologies and energy. Given the focus on carbon neutrality, the 2022 Scoping Plan also includes discussion for the first time of the natural and working lands sectors as sources for both sequestration and carbon storage, and as sources of emissions as a result of wildfires.

Table 1 provides a summary of major climate legislation and executive orders issued since the adoption of the 2017 Scoping Plan.

Table 1
Major Climate Legislation and Executive Orders Enacted Since the 2017 Scoping Plan

Bill/Executive Order	Summary
<p>Assembly Bill 1279 (AB 1279) (Muratsuchi, Chapter 337, Statutes of 2022)</p> <p><i>The California Climate Crisis Act</i></p>	<p>AB 1279 establishes the policy of the state to achieve carbon neutrality as soon as possible, but no later than 2045; to maintain net negative GHG emissions thereafter; and to ensure that by 2045 statewide anthropogenic GHG emissions are reduced at least 85 percent below 1990 levels. The bill requires CARB to ensure that the Scoping Plan updates identify and recommend measures to achieve carbon neutrality, and to identify and implement policies and strategies that enable CO₂ removal solutions and carbon capture, utilization, and storage (CCUS) technologies.</p> <p>This bill is reflected directly in the 2022 Scoping Plan Update.</p>
<p>Senate Bill 905 (SB 905) (Caballero, Chapter 359, Statutes of 2022)</p> <p><i>Carbon Capture, Removal, Utilization, and Storage Program</i></p>	<p>SB 905 requires CARB to create the Carbon Capture, Removal, Utilization, and Storage Program to evaluate, demonstrate, and regulate CCUS and carbon dioxide removal (CDR) projects and technology.</p> <p>The bill requires CARB, on or before January 1, 2025, to adopt regulations creating a unified state permitting application for approval of CCUS and CDR projects. The bill also requires the Secretary of the Natural Resources Agency to publish a framework for governing agreements for two or more tracts of land overlying the same geologic storage reservoir for the purposes of a carbon sequestration project.</p> <p>The 2022 Scoping Plan Update modeling reflects both CCUS and CDR contributions to achieve carbon neutrality.</p>
<p>Senate Bill 846 (SB 846) (Dodd, Chapter 239, Statutes of 2022)</p> <p><i>Diablo Canyon Powerplant: Extension of Operations</i></p>	<p>SB 846 extends the Diablo Canyon Power Plant’s sunset date by up to five additional years for each of its two units and seeks to make the nuclear power plant eligible for federal loans. The bill requires that the California Public Utilities Commission (CPUC) not include and disallow a load-serving entity from including in their adopted resource plan, the energy, capacity, or any attribute from the Diablo Canyon power plant.</p> <p>The 2022 Scoping Plan Update explains the emissions impact of this legislation.</p>
<p>Senate Bill 1020 (SB 1020) (Laird, Chapter 361, Statutes of 2022)</p> <p><i>Clean Energy, Jobs, and Affordability Act of 2022</i></p>	<p>SB 1020 adds interim renewable energy and zero carbon energy retail sales of electricity targets to California end-use customers set at 90 percent in 2035 and 95 percent in 2040. It accelerates the timeline required to have 100 percent renewable energy and zero carbon energy procured to serve state agencies from the original target year of 2045 to 2035. This bill requires each state agency to individually achieve the 100 percent goal by 2035 with specified requirements. This bill requires the CPUC, California Energy Commission (CEC), and CARB, on or before</p>

Table 1

Major Climate Legislation and Executive Orders Enacted Since the 2017 Scoping Plan

Bill/Executive Order	Summary
	<p>December 1, 2023, and annually thereafter, to issue a joint reliability progress report that reviews system and local reliability.</p> <p>The bill also modifies the requirement for CARB to hold a portion of its Scoping Plan workshops in regions of the state with the most significant exposure to air pollutants by further specifying that this includes communities with minority populations or low-income communities in areas designated as being in extreme federal non-attainment.</p> <p>The 2022 Scoping Plan Update describes the implications of this legislation on emissions.</p>
<p>Senate Bill 1137 (SB 1137) (Gonzales, Chapter 365, Statutes of 2022)</p> <p><i>Oil & Gas Operations: Location Restrictions: Notice of Intention: Health protection zone: Sensitive receptors</i></p>	<p>SB 1137 prohibits the development of new oil and gas wells or infrastructure in health protection zones, as defined, except for purposes of public health and safety or other limited exceptions. The bill requires operators of existing oil and gas wells or infrastructure within health protection zones to undertake specified monitoring, public notice, and nuisance requirements. The bill requires CARB to consult and concur with the California Geologic Energy Management Division (CalGEM) on leak detection and repair plans for these facilities, adopt regulations as necessary to implement emission detection system standards, and collaborate with CalGEM on public access to emissions detection data.</p>
<p>Senate Bill 1075 (SB 1075) (Skinner, Chapter 363, Statutes of 2022)</p> <p><i>Hydrogen: Green Hydrogen: Emissions of Greenhouse Gases</i></p>	<p>SB 1075 requires CARB, by June 1, 2024, to prepare an evaluation that includes: policy recommendations regarding the use of hydrogen, and specifically the use of green hydrogen, in California; a description of strategies supporting hydrogen infrastructure, including identifying policies that promote the reduction of GHGs and short-lived climate pollutants; a description of other forms of hydrogen to achieve emission reductions; an analysis of curtailed electricity; an estimate of GHG and emission reductions that could be achieved through deployment of green hydrogen through a variety of scenarios; an analysis of the potential for opportunities to integrate hydrogen production and applications with drinking water supply treatment needs; policy recommendations for regulatory and permitting processes associated with transmitting and distributing hydrogen from production sites to end uses; an analysis of the life-cycle GHG emissions from various forms of hydrogen production; and an analysis of air pollution and other environmental impacts from hydrogen distribution and end uses.</p> <p>This bill would inform the production of hydrogen at the scale called for in the 2022 Scoping Plan Update.</p>
<p>Assembly Bill 1757 (AB 1757) (Garcia, Chapter 341, Statutes of 2022)</p> <p><i>California Global Warming Solutions Act of 2006: Climate Goal: Natural and Working Lands</i></p>	<p>AB 1757 requires the California Natural Resources Agency (CNRA), in collaboration with CARB, other state agencies, and an expert advisory committee, to determine a range of targets for natural carbon sequestration, and for nature-based climate solutions, that reduce GHG emissions in 2030, 2038, and 2045 by January 1, 2024. These targets must support state goals to achieve carbon neutrality and foster climate adaptation and resilience.</p>

Table 1

Major Climate Legislation and Executive Orders Enacted Since the 2017 Scoping Plan

Bill/Executive Order	Summary
	<p>This bill also requires CARB to develop standard methods for state agencies to consistently track GHG emissions and reductions, carbon sequestration, and additional benefits from natural and working lands over time. These methods will account for GHG emissions reductions of CO₂, methane, and nitrous oxide related to natural and working lands and the potential impacts of climate change on the ability to reduce GHG emissions and sequester carbon from natural and working lands, where feasible.</p> <p>This 2022 Scoping Plan Update describes the next steps and implications of this legislation for the natural and working lands sector.</p>
<p>Senate Bill 1206 (SB 1206) (Skinner, Chapter 884, Statutes of 2022) <i>Hydrofluorocarbon gases: sale or distribution</i></p>	<p>SB 1206 mandates a stepped sales prohibition on newly produced high-global warming potential (GWP) HFCs to transition California's economy toward recycled and reclaimed HFCs for servicing existing HFC-based equipment. Additionally, SB 1206 also requires CARB to develop regulations to increase the adoption of very low-, i.e., GWP < 10, and no-GWP technologies in sectors that currently rely on higher-GWP HFCs.</p>
<p>Senate Bill 27 (SB 27) (Skinner, Chapter 237, Statutes of 2021) <i>Carbon Sequestration: State Goals: Natural and Working Lands: Registry of Projects</i></p>	<p>SB 27 requires CNRA, in coordination with other state agencies, to establish the Natural and Working Lands Climate Smart Strategy by July 1, 2023. This bill also requires CARB to establish specified CO₂ removal targets for 2030 and beyond as part of its Scoping Plan. Under SB 27, CNRA is to establish and maintain a registry to identify projects in the state that drive climate action on natural and working lands and are seeking funding.</p> <p>CNRA also must track carbon removal and GHG emission reduction benefits derived from projects funded through the registry.</p> <p>This bill is reflected directly in the 2022 Scoping Plan Update as CO₂ removal targets for 2030 and 2045 in support of carbon neutrality.</p>
<p>Senate Bill 596 (SB 596) (Becker, Chapter 246, Statutes of 2021) <i>Greenhouse Gases: Cement Sector: Net-zero Emissions Strategy</i></p>	<p>SB 596 requires CARB, by July 1, 2023, to develop a comprehensive strategy for the state's cement sector to achieve net-zero-emissions of GHGs associated with cement used within the state as soon as possible, but no later than December 31, 2045. The bill establishes an interim target of 40 percent below the 2019 average GHG intensity of cement by December 31, 2035. Under SB 596, CARB must:</p> <ul style="list-style-type: none"> • Define a metric for GHG intensity and establish a baseline from which to measure GHG intensity reductions. • Evaluate the feasibility of the 2035 interim target (40 percent reduction in GHG intensity) by July 1, 2028. • Coordinate and consult with other state agencies. • Prioritize actions that leverage state and federal incentives. • Evaluate measures to support market demand and financial incentives to encourage the production and use of cement with low GHG intensity.

Table 1

Major Climate Legislation and Executive Orders Enacted Since the 2017 Scoping Plan

Bill/Executive Order	Summary
	<p>The 2022 Scoping Plan Update modeling is designed to achieve these outcomes.</p>
<p>Executive Order N-82-20</p>	<p>Governor Newsom signed Executive Order N-82-20 in October 2020 to combat the climate and biodiversity crises by setting a statewide goal to conserve at least 30 percent of California’s land and coastal waters by 2030. The Executive Order also instructed the CNRA, in consultation with other state agencies, to develop a Natural and Working Lands Climate Smart Strategy that serves as a framework to advance the state’s carbon neutrality goal and build climate resilience. In addition to setting a statewide conservation goal, the Executive Order directed CARB to update the target for natural and working lands in support of carbon neutrality as part of this Scoping Plan, and to take into consideration the NWL Climate Smart Strategy.</p> <p>CO2 Executive Order N-82-20 also calls on the CNRA, in consultation with other state agencies, to establish the California Biodiversity Collaborative (Collaborative). The Collaborative shall be made up of governmental partners, California Native American tribes, experts, business and community leaders, and other stakeholders from across the state. State agencies will consult the Collaborative on efforts to:</p> <ul style="list-style-type: none"> • Establish a baseline assessment of California’s biodiversity that builds upon existing data and can be updated over time. • Analyze and project the impact of climate change and other stressors in California’s biodiversity. • Inventory current biodiversity efforts across all sectors and highlight opportunities for additional action to preserve and enhance biodiversity. <p>CNRA also is tasked with advancing efforts to conserve biodiversity through various actions, such as streamlining the state’s process to approve and facilitate projects related to environmental restoration and land management. The California Department of Food and Agriculture (CDFA) is directed to advance efforts to conserve biodiversity through measures such as reinvigorating populations of pollinator insects, which restore biodiversity and improve agricultural production.</p> <p>The Natural and Working Lands Climate Smart Strategy informs the 2022 Scoping Plan Update.</p>
<p>Executive Order N-79-20</p>	<p>Governor Newsom signed Executive Order N-79-20 in September 2020 to establish targets for the transportation sector to support the state in its goal to achieve carbon neutrality by 2045. The targets established in this Executive Order are:</p> <ul style="list-style-type: none"> • 100 percent of in-state sales of new passenger cars and trucks will be zero-emission by 2035.

Table 1

Major Climate Legislation and Executive Orders Enacted Since the 2017 Scoping Plan

Bill/Executive Order	Summary
	<ul style="list-style-type: none"> • 100 percent of medium- and heavy-duty vehicles will be zero-emission by 2045 for all operations where feasible, and by 2035 for drayage trucks. • 100 percent of off-road vehicles and equipment will be zero-emission by 2035 where feasible. <p>The Executive Order also tasked CARB to develop and propose regulations that require increasing volumes of zero- electric passenger vehicles, medium- and heavy-duty vehicles, drayage trucks, and off-road vehicles toward their corresponding targets of 100 percent zero-emission by 2035 or 2045, as listed above.</p> <p>The 2022 Scoping Plan Update modeling reflects achieving these targets.</p>
<p>Executive Order N-19-19</p>	<p>Governor Newsom signed Executive Order N-19-19 in September 2019 to direct state government to redouble its efforts to reduce GHG emissions and mitigate the impacts of climate change while building a sustainable, inclusive economy. This Executive Order instructs the Department of Finance to create a Climate Investment Framework that:</p> <ul style="list-style-type: none"> • Includes a proactive strategy for the state’s pension funds that reflects the increased risks to the economy and physical environment due to climate change. • Provides a timeline and criteria to shift investments to companies and industry sectors with greater growth potential based on their focus of reducing carbon emissions and adapting to the impacts of climate change. • Aligns with the fiduciary responsibilities of the California Public Employees’ Retirement System, California State Teachers’ Retirement System, and the University of California Retirement Program. <p>Executive Order N-19-19 directs the State Transportation Agency to leverage more than \$5 billion in annual state transportation spending to help reverse the trend of increased fuel consumption and reduce GHG emissions associated with the transportation sector. It also calls on the Department of General Services to leverage its management and ownership of the state’s 19 million square feet in managed buildings, 51,000 vehicles, and other physical assets and goods to minimize state government’s carbon footprint. Finally, it tasks CARB with accelerating progress toward California’s goal of five million ZEV sales by 2030 by:</p> <ul style="list-style-type: none"> • Developing new criteria for clean vehicle incentive programs to encourage manufacturers to produce clean, affordable cars. • Proposing new strategies to increase demand in the primary and secondary markets for ZEVs.

Table 1

Major Climate Legislation and Executive Orders Enacted Since the 2017 Scoping Plan

Bill/Executive Order	Summary
	<ul style="list-style-type: none"> Considering strengthening existing regulations or adopting new ones to achieve the necessary GHG reductions from within the transportation sector. <p>The 2022 Scoping Plan Update modeling reflects efforts to accelerate ZEV deployment.</p>
<p>Senate Bill 576 (SB 576) (Umberg, Chapter 374, Statutes of 2019)</p> <p><i>Coastal Resources: Climate Ready Program and Coastal Climate Change Adaptation, Infrastructure and Readiness Program</i></p>	<p>Sea level rise, combined with storm-driven waves, poses a direct risk to the state’s coastal resources, including public and private real property and infrastructure. Rising marine waters threaten sensitive coastal areas, habitats, the survival of threatened and endangered species, beaches, other recreation areas, and urban waterfronts. SB 576 mandates that the Ocean Protection Council develop and implement a coastal climate adaptation, infrastructure, and readiness program to improve the climate change resiliency of California’s coastal communities, infrastructure, and habitat. This bill also instructs the State Coastal Conservancy to administer the Climate Ready Program, which addresses the impacts and potential impacts of climate change on resources within the conservancy’s jurisdiction.</p>
<p>Assembly Bill 65 (AB 65) (Petrie-Norris, Chapter 347, Statutes of 2019)</p> <p><i>Coastal Protection: Climate Adaption: Project Prioritization: Natural Infrastructure: Local General Plans</i></p>	<p>This bill requires the State Coastal Conservancy, when it allocates any funding appropriated pursuant to the California Drought, Water, Parks, Climate, Coastal Protection, and Outdoor Access For All Act of 2018, to prioritize projects that use natural infrastructure in coastal communities to help adapt to climate change. The bill requires the conservancy to provide information to the Office of Planning and Research on any projects funded pursuant to the above provision to be considered for inclusion into the clearinghouse for climate adaptation information. The bill authorizes the conservancy to provide technical assistance to coastal communities to better assist them with their projects that use natural infrastructure.</p>
<p>Executive Order B-55-18</p>	<p>Governor Brown signed Executive Order B-55-18 in September 2018 to establish a statewide goal to achieve carbon neutrality as soon as possible, and no later than 2045, and to achieve and maintain net negative emissions thereafter. Policies and programs undertaken to achieve this goal shall:</p> <ul style="list-style-type: none"> Seek to improve air quality and support the health and economic resiliency of urban and rural communities, particularly low-income and disadvantaged communities. Be implemented in a manner that supports climate adaptation and biodiversity, including protection of the state’s water supply, water quality, and native plants and animals. <p>This Executive Order also calls for CARB to:</p> <ul style="list-style-type: none"> Develop a framework for implementation and accounting that tracks progress toward this goal.

Table 1

Major Climate Legislation and Executive Orders Enacted Since the 2017 Scoping Plan

Bill/Executive Order	Summary
	<ul style="list-style-type: none"> Ensure future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal. <p>The 2022 Scoping Plan Update is designed to achieve carbon neutrality no later than 2045 and the modeling includes technology and fuel transitions to achieve that outcome.</p>
<p>Senate Bill 100 (SB 100) (De León, Chapter 312, Statutes of 2018) <i>California Renewables Portfolio Standard Program: emissions of greenhouse gases</i></p>	<p>Under SB 100, the CPUC, CEC, and CARB shall use programs under existing laws to achieve 100 percent clean electricity. The statute requires these agencies to issue a joint policy report on SB 100 every four years. The first of these reports was issued in 2021.</p> <p>The 2022 Scoping Plan Update reflects the SB 100 Core Scenario resource mix with a few minor updates.</p>
<p>Assembly Bill 2127 (AB 2127) (Ting, Chapter 365, Statutes of 2018) <i>Electric Vehicle Charging Infrastructure: Assessment</i></p>	<p>This bill requires the CEC, working with CARB and the CPUC, to prepare and biennially update a statewide assessment of the electric vehicle charging infrastructure needed to support the levels of electric vehicle adoption required for the state to meet its goals of putting at least 5 million zero-emission vehicles on California roads by 2030 and of reducing emissions of GHGs to 40 percent below 1990 levels by 2030. The bill requires the CEC to regularly seek data and input from stakeholders relating to electric vehicle charging infrastructure.</p> <p>This bill supports the deployment of ZEVs as modeled in the 2022 Scoping Plan Update.</p>
<p>Senate Bill 30 (SB 30) (Lara, Chapter 614, Statutes of 2018) <i>Insurance: Climate Change</i></p>	<p>This bill requires the Insurance Commissioner to convene a working group to identify, assess, and recommend risk transfer market mechanisms that, among other things, promote investment in natural infrastructure to reduce the risks of climate change related to catastrophic events, create incentives for investment in natural infrastructure to reduce risks to communities, and provide mitigation incentives for private investment in natural lands to lessen exposure and reduce climate risks to public safety, property, utilities, and infrastructure. The bill requires the policies recommended to address specified questions.</p>
<p>Assembly Bill 2061 (AB 2061) (Frazier, Chapter 580, Statutes of 2018) <i>Near-zero-emission and Zero-emission Vehicles</i></p>	<p>Existing state and federal law sets specified limits on the total gross weight imposed on the highway by a vehicle with any group of two or more consecutive axles. Under existing federal law, the maximum gross vehicle weight of that vehicle may not exceed 82,000 pounds. AB 2061 authorizes a near-zero- emission vehicle or a zero-emission vehicle to exceed the weight limits on the power unit by up to 2,000 pounds.</p> <p>This bill supports the deployment of cleaner trucks as modeled in this 2022 Scoping Plan Update.</p>

The 2022 Scoping Plan scenario identifies the need to accelerate AB 32's 2030 target, from 40 percent to 48 percent below 1990 levels. Cap-and-Trade regulation continues to play a large factor in the reduction of near-term emissions for meeting the 2030 reduction target. Every sector of the economy will need to begin to transition in this decade to meet these GHG reduction goals and achieve carbon neutrality no later than 2045. The 2022 Scoping Plan approaches decarbonization from two perspectives, managing a phasedown of existing energy sources and technologies, as well as increasing, developing, and deploying alternative clean energy sources and technology. The Scoping Plan scenario is summarized in Table 2-1 (starting on page 72) of the 2022 Scoping Plan. It includes references to relevant statutes and Executive Orders, although it is not comprehensive of all existing new authorities for directing or supporting the actions described. Table 2-1 identifies actions related to a variety of sectors such as: smart growth and reductions in VMT; light-duty vehicles (LDV) and zero-emission vehicles (ZEV); truck ZEVs; reduce fossil energy, emissions, and GHGs for aviation, ocean-going vessels, port operations, freight and passenger rail, oil and gas extraction; and petroleum refining; improvements in electricity generation; electrical appliances in new and existing residential and commercial buildings; electrification and emission reductions across industries such as for food products, construction equipment, chemicals and allied products, pulp and paper, stone/clay/glass/cement, other industrial manufacturing, and agriculture; retiring of combined heat and power facilities; low carbon fuels for transportation, business, and industry; improvements in non-combustion methane emissions, and introduction of low GWP refrigerants.

Achieving the targets described in the 2022 Scoping Plan will require continued commitment to and successful implementation of existing policies and programs, and identification of new policy tools and technical solutions to go further, faster. California's Legislature and state agencies will continue to collaborate to achieve the state's climate, clean air, equity, and broader economic and environmental protection goals. It will be necessary to maintain and strengthen this collaborative effort, and to draw upon the assistance of the federal government, regional and local governments, tribes, communities, academic institutions, and the private sector to achieve the state's near-term and longer-term emission reduction goals and a more equitable future for all Californians. The Scoping Plan acknowledges that the path forward is not dependent on one agency, one state, or even one country. However, the State can lead by engaging Californians and demonstrating how actions at the state, regional, and local levels of governments, as well as action at community and individual levels, can contribute to addressing the challenge.

Aligning local jurisdiction action with state-level priorities to tackle climate change and the outcomes called for in the 2022 Scoping Plan is identified as critical to achieving the statutory targets for 2030 and 2045. The 2022 Scoping Plan discusses the role of local governments in meeting the State's GHG reductions goals. Local governments have the primary authority to plan, zone, approve, and permit how and where land is developed to accommodate population growth, economic growth, and the changing needs of their jurisdictions. They also make critical decisions on how and when to deploy transportation infrastructure, and can choose to support transit, walking, bicycling, and neighborhoods that do not force people into cars. Local governments also have the option to adopt building ordinances that exceed statewide building code requirements and play a critical role in facilitating the rollout of ZEV infrastructure. As a result, local government decisions play a critical role in supporting state-level measures to contain the growth of GHG emissions associated with the transportation system and the built environment – the two largest GHG emissions sectors over which local governments have authority. The City has taken the initiative in combating climate change by developing programs and regulations such as:

- Green New Deal
- Green Building Code
- City of Los Angeles All-Electric Buildings
- General Plan Housing Element (Housing Needs Assessment)
- Mobility Plan 2035

These programs and regulations are the mechanisms by which the City would achieve the statutory targets for 2030 and 2045. Below is a brief overview of the City of Los Angeles All-Electric Buildings regulation, the General Plan Housing Element (Housing Needs Assessment), and the Mobility Plan 2035. Summaries of the Green New Deal and Green Building Code can be found in the SCEA.

City of Los Angeles All-Electric Buildings

Chapter IX of the LAMC requires that all new buildings be all-electric buildings, with few exceptions. Equipment typically powered by natural gas such as space heating, water heating, cooking appliances, and clothes drying would need to be powered by electricity for new construction. Exceptions are made for commercial restaurants, laboratories, and research and development uses. The LAMC is consistent with 2022 Title 24 goals of encouraging all-electric development which requires new residential uses to be electric-ready (wiring installed for all-electric appliances). Buildings in Los Angeles account for 43 percent of greenhouse gas emissions – more than any other sector in the City. These LAMC requirements ensure that new buildings being constructed are built to leverage the increasingly clean electric grid, which is anticipated to be carbon-free by 2035, rather than relying on fossil fuels.

General Plan Housing Element (Housing Needs Assessment)

The Housing Element of the City's General Plan is prepared pursuant to state law and provides planning guidance in meeting housing needs identified in the SCAG Regional Housing Needs Assessment (RHNA). The Housing Element identifies the City's housing conditions and needs, establishes the goals, objectives, and policies that are the foundation of the City's housing and growth strategy, and provides an array of programs the City intends to implement to create and preserve sustainable, mixed-income neighborhoods across the City.

The Housing Needs Assessment chapter of the Housing Element discusses the City's population and housing stock to identify housing needs for a variety of household types across the City. The current RHNA goal for affordable housing within the City is approximately 40 percent of new construction. However, the City's projections show affordable housing comprising 20 percent of new construction, which falls short of the 40 percent RHNA goal. In order to address this shortfall in affordable housing, the Housing Element provides measures to streamline and incentivize development of affordable housing. Such measures include revising density bonuses for affordable housing; identifying locations which are ideal for funding programs to meet low-income housing goals; and rezoning areas to encourage low-income housing. With implementation of such measures to increase affordable housing, the Housing Element predicts a significant increase in housing production at all income ranges compared to previous cycles.

The Housing Element also promotes sustainability and resilience, and environmental justice through housing, as well as the need to reduce displacement. It encourages the utilization of

alternatives to current parking standards that lower the cost of housing, support GHG and VMT goals and recognize the emergence of shared and alternative mobility. The Element also identifies housing strategies for energy conservation, water conservation, alternative energy sources and sustainable development which support conservation and reduce demand.

Mobility Plan 2035

In August 2015, the City Council adopted Mobility Plan 2035, which serves as the City's General Plan circulation element. The City Council has adopted several amendments to the Mobility Plan since its initial adoption, including the most recent amendment in September 2016. The Mobility Plan incorporates "complete streets" principles and lays the foundation for how the City's residents interact with their streets. While the Mobility Plan 2035 mainly relates to transportation, certain components would serve to reduce VMT and mobile source GHG emissions. One component of the Mobility Plan is a GHG emission tracking program to establish compliance with SB 375, AB 32, and the region's Sustainable Community Strategy.

Appendix D, Local Actions, of the 2022 Scoping Plan Update includes "recommendations intended to building momentum for local government actions that align with the State's climate goals, with a focus on local GHG reduction strategies (commonly referred to as climate action planning) and approval of new land use development projects, including through environmental review under CEQA.

The State encourages local governments to adopt a CEQA-qualified CAP addressing the three priority areas (transportation electrification, VMT reduction, and building decarbonization). However, the State recognizes that almost 50 percent of jurisdictions do not have an adopted CAP, among other reasons because they are costly, requiring technical expertise, staffing, and funding. Additionally, CAPs need to be monitored and updated as State targets change and new data is available. Jurisdictions that wish to take meaningful climate action (such as preparing a non-CEQA qualified CAP or as individual measures) aligned with the State's climate goals in the absence of a CEQA-qualified CAP are advised to look to the three priority areas when developing local climate plans, measures, policies, and actions. According to Appendix D, "By prioritizing climate action in these three priority areas, local governments can address the largest sources of GHGs within their jurisdiction."

The State also recognizes in Appendix D, Local Actions, of the 2022 Scoping Plan that each community or local area has distinctive situations and local jurisdictions must balance the urgent need for housing while demonstrating that a project is in alignment with the State's climate goals. The State calls for the climate crisis and the housing crisis to be confronted simultaneously. Jurisdictions should avoid creating targets that are impossible to meet as a basis to determine significance. Ultimately, targets that make it more difficult to achieve statewide goals by prohibiting or complicating projects that are needed to support the State's climate goals, like infill development, low-income housing or solar arrays, are not consistent with the State's goals. The State also recognizes the lead agencies' discretion to develop evidence-based approaches for determining whether a project would have a potentially significant impact on GHG emissions.

As discussed, jurisdictions that want to take meaningful climate action should look to the following three priority areas: transportation electrification, VMT reduction, and building decarbonization. An assessment of the goals, plans, and policies implemented by the City which would support GHG reduction strategies in the three priority areas is provided below.

Transportation Electrification

The priority GHG reduction strategies for local government climate action related to transportation electrification are discussed below and would support the Scoping Plan action to have 100 percent of all new passenger vehicles be zero-emission by 2035.

- **Convert local government fleets to zero-emission vehicles (ZEV)**

CARB approved the Advanced Clean Cars II rule which codifies Executive Order N-79-20 and requires 100 percent of new cars and light trucks sold in California to be zero-emission vehicles by 2035. The State has also adopted AB 2127, which requires the CEC to analyze and examine charging needs to support California's EVs in 2030. This report would help decision-makers allocate resources to install new EV chargers where they are needed most.

The City of LA Green New Deal (Sustainable City pLAN 2019) identifies a number of measures to reduce VMT and associated GHG emissions. Such measures that would support the local reduction strategy include converting all city fleet vehicles to zero emission where technically feasible by 2028. Starting in 2021, all vehicle procurement followed a "zero emission first" policy for City fleets. The Green New Deal also establishes a target to increase the percentage of zero emission vehicles to 25 percent by 2025, 80 percent by 2035, and 100 percent by 2050. In order to achieve this goal, the City would build 20 Fast Charging Plazas throughout the City. The City would also install 28,000 publicly available chargers by 2028 to encourage adoption of ZEVs.

The City's goals of converting the municipal fleet to zero emissions and installation of EV chargers throughout the City would be consistent with the Scoping Plan goals of transitioning to EVs. Although this measure mainly applies to City fleets, the Revised Project would not conflict with these goals. The Revised Project would include 124 EV parking spaces, 42 of which would be parking spaces with EV charging stations. The remaining 82 spaces would be EV ready, consistent with LAMC requirements.

- **Create a jurisdiction-specific ZEV ecosystem to support deployment of ZEVs statewide (such as building standards that exceed state building codes, permit streamlining, infrastructure siting, consumer education, preferential parking policies, and ZEV readiness plans.**

The State has adopted AB 1236 and AB 970, which require cities to adopt streamlined permitting procedures for EV charging stations. As a result, the City updated Section IX of the LAMC, which requires most new construction to designate 30 percent of new parking spaces as capable of supporting future electric vehicle supply equipment (EVSE). This would exceed the CALGreen 2022 requirements of 20 percent of new parking spaces as EV capable. The ordinance also requires new construction to install EVSE at 10 percent of total parking spaces. This requirement also exceeds the CALGreen 2022 requirements of installing EVSE for 25 percent of EV capable parking spaces which is approximately five percent of total parking spaces. The City has also implemented programs to increase the amount of EV charging on city streets, EV carshare, and incentive programs for apartments to be retrofitted with EV chargers.

The City's goals of installing EV chargers throughout the City would be consistent with the Scoping Plan's goals of transitioning to EVs. The Revised Project would support this goal, as well. As noted,

the Revised Project would include 124 EV parking spaces, 42 of which would be parking spaces with EV charging stations. The remaining 82 spaces would be EV ready, consistent with LAMC requirements.

VMT Reduction

The priority GHG reduction strategies for local government climate action related to VMT reduction are discussed below and would support the Scoping Plan action to reduce VMT per capita 25 percent below 2019 levels by 2030 and 30 percent below 2019 levels by 2045.

- **Reduce or eliminate minimum parking standards in new developments.**
- **Implement parking pricing or transportation demand management pricing strategies.**

The City of Los Angeles Mobility Plan 2035, which is the Transportation Element of the City's General Plan, contains measures and programs related to VMT reduction throughout the City. With regard to parking standards, the implementation of Mobility Plan Programs and AB 2097 reduce or eliminate parking requirements for certain types of development near transit (within half a mile). These reduction strategies and TDM programs would serve to reduce minimum parking standards and reduce vehicle trips. In support of these strategies, the Revised Project would unbundle parking costs from residential rental costs.

- **Implement Complete Streets policies and investments, consistent with general plan circulation element requirements.**

The City of Los Angeles Mobility Plan 2035 established a "Complete Streets" planning framework which result in the City of Los Angeles Complete Streets Design Guide in 2015, consistent with the State's Complete Streets Act of 2008. A supplemental update to the Complete Streets Design Guide was adopted in 2020.

The Complete Streets Design Guide provides a number of measures to increase public access to electric shuttles, car sharing, and other active transportation modes. The Design Guide establishes guidelines for establishing on-street parking for car sharing. The City has also established BlueLA, which is a car sharing network consisting of more than 100 electric vehicles located throughout the City. In addition, under the Green New Deal, the City would install 28,000 publicly available chargers by 2028 and introduce 135 new electric DASH buses.

This reduction strategy mainly applies to City traffic circulation, but the Revised Project would be in support of this strategy. As explained, the Revised Project would be located within a HQTAs and along a Livable Corridor. The Project Site also qualifies as a TOC Tier 3 site based on its proximity to high quality bus stops and a future D Line station at the intersection of Wilshire Boulevard and La Cienega Boulevard. The Revised Project would also be located within a "Pedestrian Enhanced District." These considerations demonstrate the Revised Project's consistency with "Complete Streets" policies to promote transit ridership and active transportation modes.

- **Increase access to public transit by increasing density of development near transit, improving transit service by increasing service frequency, creating bus priority lanes, reducing or eliminating fares, microtransit, etc.**

- **Increase public access to clean mobility options by planning for and investing in electric shuttles, bike share, car share, and walking.**
- **Amend zoning or development codes to enable mixed-use, walkable, transit-oriented, and compact infill development (such as increasing the allowable density of a neighborhood).**
- **Preserve natural and working lands by implementing land use policies that guide development toward infill areas and do not convert “greenfield” land to urban uses (e.g., green belts, strategic conservation easements).**

These reduction strategies are supported through implementation of SB 375, which requires integration of planning processes for transportation, land-use and housing and generally encourages jobs/housing proximity, promote transit-oriented development, and encourages high-density residential/commercial development along transit corridors.

To implement SB 375 and reduce GHG emissions by correlating land use and transportation planning, SCAG adopted the 2020-2045 RTP/SCS, also referred to as Connect SoCal. The 2020-2045 RTP/SCS’s “Core Vision” prioritizes the maintenance and management of the region’s transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and complete streets.

On a local level, the City has developed the Complete Streets Design Guide, which provides a number of reduction strategies to increase public access to electric shuttles, car sharing and walking, continues to build out networks in the Mobility Plan for pedestrians, bicyclists, and transit users, has implemented an EV car sharing network, and is working towards increasing publicly available chargers, and introducing new electric DASH buses.

The Revised Project’s consistency with these strategies is largely demonstrated by its consistency with SCAG’s 2020-2045 RTP/SCS, which is addressed and explained earlier in this report.

As discussed earlier, the City’s Housing Element of the General Plan provides planning guidance in meeting housing needs identified in the SCAG RHNA. The current RHNA goal for affordable housing within the City is approximately 40 percent of new construction. However, the City’s projections show affordable housing comprising twenty percent of new construction, which falls short of the forty percent goal. In order to address this shortfall, the Housing Element identifies measures to encourage development of affordable housing such as revising density bonuses for affordable housing, identify locations which are ideal for funding programs to meet low-income housing goals; and rezone areas to encourage low-income housing. The Housing Element estimates that implementation of these measures would increase housing production at all income ranges compared to previous cycles.

The City’s 20 percent goal of low-income housing for new construction is applicable on a citywide basis and not applicable to an individual project. The Planning Department Housing Division found, based on market studies and experiences of other agencies, that mandating 20-percent affordable housing on individual projects is likely to reduce overall housing productions, including low income housing, and would thus be contrary to City and State policies. Pushing more housing outside of the City would be contrary to the Scoping Plan, as infill housing production in the City, which is a highly urbanized city with billions in transit infrastructure, would lower average VMT in

the SCAG region. The Revised Project would be considered supportive of the City's strategies to promote low income housing through its incorporation of 29 residential units set aside for Extremely Low-Income households. This represents 10 percent of the Revised Project's total residential units. Though this is below the Citywide 20 percent goal, the Extremely Low-Income threshold designation goes beyond the strategy's low-income affordability criteria.

Building Decarbonization

The priority GHG reduction strategies for local government climate action related to electrification are discussed below and would support the Scoping Plan actions regarding meeting increased demand for electrification without new fossil gas-fired resources and all electric appliances beginning in 2026 (residential) and 2029 (commercial).

- **Adopt all-electric new construction each codes for residential and commercial uses.**

California's transition away from fossil fuel-based energy sources will bring the Revised Project's GHG emissions associated with building energy use down to zero as the State's electric supply becomes 100 percent carbon free. California has committed to achieving this goal by 2045 through SB 100, the 100 Percent Clean Energy Act of 2018. SB 100 strengthened the State's RPS Standard by requiring that 60 percent of all electricity provided to retail users in California come from renewable sources by 2030 and that 100 percent come from carbon-free sources by 2045. The land use sector will benefit from RPS because the electricity used in buildings will be increasingly carbon-free, but implementation does not depend (directly, at least) on how buildings are designed and built.

The City has updated the LAMC with requirements for all new buildings, with some exceptions, to be all-electric, which will reduce GHG emissions related to natural gas combustion. Space heating, water heating, and cooking for non-restaurant uses would be required to be powered by electricity. In future years, LADWP will be required to increase the amount of renewable energy in the power mix to comply with SB 100 requirements. The combination of all-electric LAMC regulations and increasing availability of renewable energy will serve to reduce GHG emissions from sources traditionally powered by natural gas.

The Revised Project would be required to comply with the City's LAMC and would not include natural gas uses in residential, retail, and office uses. Restaurant uses are exempt from the LAMC provisions, but would consist of a small portion of the Revised Project's total square footage. Therefore, the Revised Project would be consistent and not conflict with the LAMC.

- **Adopt policies and incentive programs to implement energy efficiency retrofits for existing buildings, such as weatherization, lighting upgrades, and replacing energy-intensive appliances and equipment with more efficient systems (such as Energy Star-rated equipment and equipment controllers).**

This reduction strategy would support the Scoping Plan action regarding electrification of appliances in existing residential buildings. The City and LADWP have established rebate programs to promote use of energy-efficient products and home upgrades. Under LADWP's Consumer Rebate Program, residential customers would receive rebates for energy-efficient upgrades such

as Cool Roofs, Energy Star Windows, HVAC upgrades, pool pumps and insulation upgrades. Such upgrades would serve to reduce wasteful energy and water use and associated GHG emissions.

The Revised Project would not involve the retrofit of existing buildings: it would be completely new construction. Therefore, this strategy does not apply to the Revised Project.

As explained, the Revised Project would not conflict with applicable strategies related to the Scoping Plan’s transportation electrification, VMT reduction, and building decarbonization priority areas. The Revised Project would be built in accordance with the City’s Green Building Code, and, as discussed earlier, the Revised Project would also be consistent with the City’s Mobility Plan 2035 and Green New Deal. Therefore, the Revised Project would be supportive of the City’s achievement of the 2022 Scoping Plan strategies for GHG reduction in the key priority areas.

3. Revised Project GHG Emissions

In support of its consistency analysis, the SCEA provided a quantitative estimate of the SCEA Project’s GHG emissions. To estimate these emissions, the SCEA analysis utilized CalEEMod version 2020.4.0, which was the latest version of this emissions modeling software at the time of the analysis. The SCEA estimated that construction of the SCEA Project would generate approximately 2,362.6 metric tons of carbon dioxide equivalent (MTCO_{2e}), or about 78.8 MTCO_{2e} annually when amortized over a 30-year project lifetime. The SCEA estimated that operations of the SCEA Project would generate approximately 2,954.7 MTCO_{2e} annually when accounting for the amortized construction emissions.

The Revised Project, its construction, and its land uses are mostly similar to the SCEA Project. There are minor differences in square footage, and the Revised Project would require somewhat less soil export (45,670 cubic yards versus 48,913 cubic yards), but it is estimated that construction of the Revised Project would ultimately require similar construction equipment performing similar tasks for similar periods of time as the SCEA Project. To estimate emissions associated with construction of the Revised Project, the latest version of CalEEMod was utilized, version 2022.1.1.14. Results of the CalEEMod analysis are shown below in **Table 3**. As shown, construction of the Revised Project is estimated to generate approximately 2,634 MTCO_{2e}, or approximately 87.8 MTCO_{2e} annually when amortized over 30 years. These figures exceed those that were estimated for the SCEA Project, but they are mainly due to changes in modeling assumptions and methodologies between CalEEMod version 2020.4.0 and CalEEMod version 2022.1.1.14. As explained, differences between the two project proposals are relatively minor.

Table 3
Revised Project: Construction-Related GHG Emissions

Year	Emissions (MTCO _{2e})
2024	1,007
2025	965
2026	662
Total	2,634
Amortized over 30 years	87.8
Source: NTEC, 2023.	

Operational GHG emissions for the Revised Project were also estimated using CalEEMod version 2022.1.1.14, the results of which are shown below in **Table 4**. The Revised Project’s total GHG emissions are lower than those that were estimated for the SCEA Project, but again they are more the product of changes in modeling assumptions and methodologies between CalEEMod version 2020.4.0 and CalEEMod version 2022.1.1.114 than they are the product of differences between the two project proposals, which are relatively minor.

**Table 4
Revised Project: Operations-Related GHG Emissions at Buildout**

Source	Emissions (MTCO _{2e})
Area	8.86
Energy	543
Mobile	1,656
Solid Waste	72.5
Water/Wastewater	44.0
Refrigerants	1.82
Construction (from Table 2)	87.8
Total Emissions	2,413.98
Source: NTEC, 2023.	

1050 La Cienega Detailed Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	1050 La Cienega
Construction Start Date	1/1/2024
Operational Year	2026
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.70
Precipitation (days)	19.6
Location	34.057609099216904, -118.37530267939933
County	Los Angeles-South Coast
City	Los Angeles
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	4323
EDFZ	16
Electric Utility	Los Angeles Department of Water & Power
Gas Utility	Southern California Gas
App Version	2022.1.1.14

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
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Apartments High Rise	290	Dwelling Unit	1.83	386,908	18,719	—	679	—
Unenclosed Parking with Elevator	184	1000sqft	0.00	184,084	0.00	—	—	—
High Turnover (Sit Down Restaurant)	5.26	1000sqft	0.00	5,260	0.00	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

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2.1. Construction Emissions Compared Against Thresholds

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

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.88	17.6	29.1	49.0	0.09	0.86	7.72	8.09	0.80	1.83	2.49	—	13,324	13,324	0.70	1.59	30.4	13,839
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.88	17.6	29.7	43.8	0.09	0.86	7.72	8.09	0.80	1.83	2.49	—	13,300	13,300	0.70	1.59	0.79	13,792
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.06	7.92	13.4	21.9	0.04	0.41	3.14	3.41	0.38	0.79	1.17	—	6,512	6,512	0.31	0.54	6.35	6,686
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.38	1.44	2.45	4.00	0.01	0.07	0.57	0.62	0.07	0.14	0.21	—	1,078	1,078	0.05	0.09	1.05	1,107

2.2. Construction Emissions by Year, Unmitigated

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

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	3.12	2.59	29.1	34.9	0.09	0.86	4.74	5.60	0.80	1.68	2.49	—	13,324	13,324	0.70	1.59	24.1	13,839
2025	2.91	2.45	13.1	33.0	0.04	0.38	4.45	4.83	0.34	1.07	1.40	—	8,172	8,172	0.34	0.43	20.6	8,330
2026	3.88	17.6	14.5	49.0	0.04	0.37	7.72	8.09	0.33	1.83	2.16	—	11,619	11,619	0.48	0.55	30.4	11,827
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	3.10	2.57	29.7	31.4	0.09	0.86	4.74	5.60	0.80	1.68	2.49	—	13,300	13,300	0.70	1.59	0.63	13,792
2025	2.89	2.44	13.3	29.8	0.04	0.38	4.45	4.83	0.34	1.07	1.40	—	7,956	7,956	0.35	0.44	0.53	8,097
2026	3.88	17.6	14.8	43.8	0.04	0.37	7.72	8.09	0.33	1.83	2.16	—	11,233	11,233	0.49	0.55	0.79	11,411
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	2.02	1.60	13.4	19.9	0.04	0.41	2.78	3.18	0.38	0.79	1.17	—	6,512	6,512	0.31	0.54	6.04	6,686
2025	2.06	1.74	9.59	21.9	0.03	0.27	3.14	3.41	0.24	0.75	0.99	—	5,724	5,724	0.25	0.31	6.35	5,830
2026	1.35	7.92	4.82	16.1	0.01	0.11	2.81	2.93	0.10	0.66	0.77	—	3,932	3,932	0.17	0.18	4.74	3,996
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.37	0.29	2.45	3.63	0.01	0.07	0.51	0.58	0.07	0.14	0.21	—	1,078	1,078	0.05	0.09	1.00	1,107
2025	0.38	0.32	1.75	4.00	< 0.005	0.05	0.57	0.62	0.04	0.14	0.18	—	948	948	0.04	0.05	1.05	965
2026	0.25	1.44	0.88	2.94	< 0.005	0.02	0.51	0.53	0.02	0.12	0.14	—	651	651	0.03	0.03	0.79	662

2.4. Operations Emissions Compared Against Thresholds

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

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
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Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	10.3	18.5	5.06	78.6	0.13	0.11	11.5	11.6	0.10	2.91	3.02	149	16,285	16,434	15.8	0.60	54.0	17,064
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	7.20	15.6	5.28	49.9	0.12	0.09	11.5	11.6	0.09	2.91	3.00	149	15,676	15,825	15.9	0.63	12.1	16,421
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	8.35	16.8	4.57	59.0	0.10	0.09	9.07	9.16	0.08	2.30	2.39	149	13,321	13,470	15.8	0.54	25.7	14,049
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.52	3.06	0.83	10.8	0.02	0.02	1.66	1.67	0.01	0.42	0.44	24.7	2,205	2,230	2.61	0.09	4.25	2,326

2.5. Operations Emissions by Sector, Unmitigated

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

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	7.26	6.63	4.70	53.8	0.12	0.08	11.5	11.6	0.07	2.91	2.99	—	12,778	12,778	0.64	0.51	43.0	12,990
Area	3.00	11.9	0.23	24.7	< 0.005	0.02	—	0.02	0.02	—	0.02	0.00	77.9	77.9	< 0.005	< 0.005	—	78.1
Energy	0.01	0.01	0.13	0.11	< 0.005	0.01	—	0.01	0.01	—	0.01	—	3,266	3,266	0.23	0.03	—	3,281
Water	—	—	—	—	—	—	—	—	—	—	—	23.8	163	187	2.45	0.06	—	266
Waste	—	—	—	—	—	—	—	—	—	—	—	125	0.00	125	12.5	0.00	—	438
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	11.0	11.0
Total	10.3	18.5	5.06	78.6	0.13	0.11	11.5	11.6	0.10	2.91	3.02	149	16,285	16,434	15.8	0.60	54.0	17,064

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	7.18	6.54	5.15	49.8	0.12	0.08	11.5	11.6	0.07	2.91	2.99	—	12,247	12,247	0.67	0.54	1.11	12,425
Area	0.00	9.07	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
Energy	0.01	0.01	0.13	0.11	< 0.005	0.01	—	0.01	0.01	—	0.01	—	3,266	3,266	0.23	0.03	—	3,281
Water	—	—	—	—	—	—	—	—	—	—	—	23.8	163	187	2.45	0.06	—	266
Waste	—	—	—	—	—	—	—	—	—	—	—	125	0.00	125	12.5	0.00	—	438
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	11.0	11.0
Total	7.20	15.6	5.28	49.9	0.12	0.09	11.5	11.6	0.09	2.91	3.00	149	15,676	15,825	15.9	0.63	12.1	16,421
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	6.28	5.75	4.28	41.9	0.10	0.06	9.07	9.14	0.06	2.30	2.36	—	9,838	9,838	0.56	0.44	14.7	9,999
Area	2.06	11.0	0.16	16.9	< 0.005	0.02	—	0.02	0.01	—	0.01	0.00	53.3	53.3	< 0.005	< 0.005	—	53.5
Energy	0.01	0.01	0.13	0.11	< 0.005	0.01	—	0.01	0.01	—	0.01	—	3,266	3,266	0.23	0.03	—	3,281
Water	—	—	—	—	—	—	—	—	—	—	—	23.8	163	187	2.45	0.06	—	266
Waste	—	—	—	—	—	—	—	—	—	—	—	125	0.00	125	12.5	0.00	—	438
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	11.0	11.0
Total	8.35	16.8	4.57	59.0	0.10	0.09	9.07	9.16	0.08	2.30	2.39	149	13,321	13,470	15.8	0.54	25.7	14,049
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.15	1.05	0.78	7.66	0.02	0.01	1.66	1.67	0.01	0.42	0.43	—	1,629	1,629	0.09	0.07	2.43	1,656
Area	0.38	2.01	0.03	3.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	0.00	8.83	8.83	< 0.005	< 0.005	—	8.86
Energy	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	541	541	0.04	0.01	—	543
Water	—	—	—	—	—	—	—	—	—	—	—	3.94	27.0	30.9	0.41	0.01	—	44.0
Waste	—	—	—	—	—	—	—	—	—	—	—	20.7	0.00	20.7	2.07	0.00	—	72.5
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.82	1.82
Total	1.52	3.06	0.83	10.8	0.02	0.02	1.66	1.67	0.01	0.42	0.44	24.7	2,205	2,230	2.61	0.09	4.25	2,326

3. Construction Emissions Details

3.1. Grading (2024) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.12	1.78	16.2	19.3	0.03	0.74	—	0.74	0.68	—	0.68	—	3,146	3,146	0.13	0.03	—	3,157
Dust From Material Movement	—	—	—	—	—	—	1.71	1.71	—	0.88	0.88	—	—	—	—	—	—	—
Onsite truck	0.18	0.08	1.82	1.34	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	259	259	0.09	0.04	0.10	274
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.12	1.78	16.2	19.3	0.03	0.74	—	0.74	0.68	—	0.68	—	3,146	3,146	0.13	0.03	—	3,157
Dust From Material Movement	—	—	—	—	—	—	1.71	1.71	—	0.88	0.88	—	—	—	—	—	—	—
Onsite truck	0.17	0.07	1.90	1.38	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	262	262	0.09	0.04	< 0.005	277
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.49	0.41	3.78	4.50	0.01	0.17	—	0.17	0.16	—	0.16	—	733	733	0.03	0.01	—	735

Dust From Material Movement:	—	—	—	—	—	—	0.40	0.40	—	0.20	0.20	—	—	—	—	—	—	
Onsite truck	0.04	0.02	0.43	0.32	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	60.6	60.6	0.02	0.01	0.01	64.1
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Off-Road Equipment	0.09	0.08	0.69	0.82	< 0.005	0.03	—	0.03	0.03	—	0.03	—	121	121	< 0.005	< 0.005	—	122
Dust From Material Movement:	—	—	—	—	—	—	0.07	0.07	—	0.04	0.04	—	—	—	—	—	—	
Onsite truck	0.01	< 0.005	0.08	0.06	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	10.0	10.0	< 0.005	< 0.005	< 0.005	10.6
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Worker	0.20	0.18	0.19	3.02	0.00	0.00	0.52	0.52	0.00	0.12	0.12	—	565	565	0.02	0.02	2.23	573
Vendor	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	0.00
Hauling	0.63	0.16	10.9	3.85	0.06	0.12	2.49	2.61	0.12	0.68	0.80	—	9,355	9,355	0.46	1.50	21.8	9,835
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Worker	0.20	0.18	0.23	2.55	0.00	0.00	0.52	0.52	0.00	0.12	0.12	—	535	535	0.02	0.02	0.06	542
Vendor	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	0.00
Hauling	0.62	0.16	11.3	3.81	0.06	0.12	2.49	2.61	0.12	0.68	0.80	—	9,357	9,357	0.46	1.50	0.56	9,816
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Worker	0.05	0.04	0.05	0.62	0.00	0.00	0.12	0.12	0.00	0.03	0.03	—	127	127	0.01	< 0.005	0.22	128
Vendor	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	0.00
Hauling	0.15	0.04	2.68	0.88	0.01	0.03	0.57	0.60	0.03	0.16	0.18	—	2,179	2,179	0.11	0.35	2.19	2,288

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.11	0.00	0.00	0.02	0.02	0.00	0.01	0.01	—	20.9	20.9	< 0.005	< 0.005	0.04	21.2
Vendor	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	0.00
Hauling	0.03	0.01	0.49	0.16	< 0.005	0.01	0.10	0.11	0.01	0.03	0.03	—	361	361	0.02	0.06	0.36	379

3.3. Grading (2024) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.26	1.06	9.84	11.2	0.03	0.40	—	0.40	0.37	—	0.37	—	3,001	3,001	0.12	0.02	—	3,011
Dust From Material Movement:	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	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	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.16	0.13	1.21	1.37	< 0.005	0.05	—	0.05	0.05	—	0.05	—	370	370	0.02	< 0.005	—	371
Dust From Material Movement:	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	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	0.00

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.02	0.22	0.25	< 0.005	0.01	—	0.01	0.01	—	0.01	—	61.3	61.3	< 0.005	< 0.005	—	61.5
Dust From Material Movement	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	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	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.25	0.22	0.24	3.77	0.00	0.00	0.65	0.65	0.00	0.15	0.15	—	706	706	0.03	0.02	2.78	717
Vendor	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	0.00
Hauling	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	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.03	0.41	0.00	0.00	0.08	0.08	0.00	0.02	0.02	—	83.7	83.7	< 0.005	< 0.005	0.15	84.9
Vendor	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	0.00
Hauling	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	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	< 0.005	0.01	0.08	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	13.9	13.9	< 0.005	< 0.005	0.02	14.1
Vendor	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	0.00
Hauling	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	0.00

3.5. Building Construction (2024) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.42	1.18	10.1	11.1	0.02	0.40	—	0.40	0.37	—	0.37	—	2,056	2,056	0.08	0.02	—	2,063
Onsite truck	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	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.42	1.18	10.1	11.1	0.02	0.40	—	0.40	0.37	—	0.37	—	2,056	2,056	0.08	0.02	—	2,063
Onsite truck	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	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.52	0.43	3.69	4.04	0.01	0.15	—	0.15	0.13	—	0.13	—	748	748	0.03	0.01	—	751
Onsite truck	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	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.09	0.08	0.67	0.74	< 0.005	0.03	—	0.03	0.02	—	0.02	—	124	124	0.01	< 0.005	—	124
Onsite truck	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	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	1.49	1.35	1.44	22.6	0.00	0.00	3.92	3.92	0.00	0.92	0.92	—	4,236	4,236	0.18	0.14	16.7	4,299
Vendor	0.16	0.06	2.36	1.16	0.01	0.03	0.53	0.56	0.03	0.15	0.17	—	2,001	2,001	0.08	0.28	5.43	2,091

Hauling	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	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	1.48	1.33	1.70	19.1	0.00	0.00	3.92	3.92	0.00	0.92	0.92	—	4,015	4,015	0.18	0.15	0.43	4,064	
Vendor	0.16	0.06	2.45	1.18	0.01	0.03	0.53	0.56	0.03	0.15	0.17	—	2,002	2,002	0.08	0.28	0.14	2,087	
Hauling	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	0.00	
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.54	0.48	0.62	7.32	0.00	0.00	1.41	1.41	0.00	0.33	0.33	—	1,483	1,483	0.07	0.05	2.62	1,503	
Vendor	0.06	0.02	0.90	0.43	0.01	0.01	0.19	0.20	0.01	0.05	0.06	—	729	729	0.03	0.10	0.85	760	
Hauling	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	0.00	
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.10	0.09	0.11	1.34	0.00	0.00	0.26	0.26	0.00	0.06	0.06	—	246	246	0.01	0.01	0.43	249	
Vendor	0.01	< 0.005	0.16	0.08	< 0.005	< 0.005	0.03	0.04	< 0.005	0.01	0.01	—	121	121	< 0.005	0.02	0.14	126	
Hauling	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	0.00	

3.7. Building Construction (2025) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.33	1.11	9.53	11.0	0.02	0.35	—	0.35	0.33	—	0.33	—	2,056	2,056	0.08	0.02	—	2,063
Onsite truck	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	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.33	1.11	9.53	11.0	0.02	0.35	—	0.35	0.33	—	0.33	—	2,056	2,056	0.08	0.02	—	2,063
Onsite truck	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	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.95	0.79	6.80	7.88	0.02	0.25	—	0.25	0.23	—	0.23	—	1,468	1,468	0.06	0.01	—	1,473
Onsite truck	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	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.17	0.14	1.24	1.44	< 0.005	0.05	—	0.05	0.04	—	0.04	—	243	243	0.01	< 0.005	—	244
Onsite truck	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	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	1.44	1.29	1.30	20.9	0.00	0.00	3.92	3.92	0.00	0.92	0.92	—	4,148	4,148	0.18	0.14	15.2	4,210
Vendor	0.14	0.06	2.24	1.09	0.01	0.03	0.53	0.56	0.01	0.15	0.16	—	1,968	1,968	0.08	0.28	5.39	2,058
Hauling	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	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	1.42	1.27	1.44	17.7	0.00	0.00	3.92	3.92	0.00	0.92	0.92	—	3,932	3,932	0.18	0.15	0.39	3,981
Vendor	0.14	0.06	2.33	1.11	0.01	0.03	0.53	0.56	0.01	0.15	0.16	—	1,969	1,969	0.08	0.28	0.14	2,053
Hauling	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	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	1.01	0.90	1.11	13.3	0.00	0.00	2.77	2.77	0.00	0.65	0.65	—	2,850	2,850	0.13	0.10	4.69	2,888
Vendor	0.10	0.04	1.68	0.78	0.01	0.02	0.38	0.40	0.01	0.10	0.11	—	1,406	1,406	0.06	0.20	1.67	1,468
Hauling	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	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.18	0.17	0.20	2.42	0.00	0.00	0.50	0.50	0.00	0.12	0.12	—	472	472	0.02	0.02	0.78	478
Vendor	0.02	0.01	0.31	0.14	< 0.005	< 0.005	0.07	0.07	< 0.005	0.02	0.02	—	233	233	0.01	0.03	0.28	243
Hauling	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	0.00

3.9. Building Construction (2026) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.26	1.05	9.07	10.9	0.02	0.31	—	0.31	0.29	—	0.29	—	2,055	2,055	0.08	0.02	—	2,062
Onsite truck	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	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.26	1.05	9.07	10.9	0.02	0.31	—	0.31	0.29	—	0.29	—	2,055	2,055	0.08	0.02	—	2,062
Onsite truck	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	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.37	0.31	2.64	3.19	0.01	0.09	—	0.09	0.08	—	0.08	—	599	599	0.02	< 0.005	—	601

Onsite truck	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	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.07	0.06	0.48	0.58	< 0.005	0.02	—	0.02	0.02	—	0.02	—	99.2	99.2	< 0.005	< 0.005	—	99.6	
Onsite truck	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	0.00	
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Worker	1.25	1.10	1.16	19.4	0.00	0.00	3.92	3.92	0.00	0.92	0.92	—	4,065	4,065	0.17	0.14	13.8	4,125	
Vendor	0.14	0.06	2.13	1.03	0.01	0.03	0.53	0.56	0.01	0.15	0.16	—	1,934	1,934	0.08	0.28	5.23	2,024	
Hauling	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	0.00	
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Worker	1.25	1.10	1.31	16.5	0.00	0.00	3.92	3.92	0.00	0.92	0.92	—	3,853	3,853	0.18	0.14	0.36	3,900	
Vendor	0.14	0.06	2.23	1.06	0.01	0.03	0.53	0.56	0.01	0.15	0.16	—	1,935	1,935	0.08	0.28	0.14	2,019	
Hauling	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	0.00	
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Worker	0.36	0.32	0.41	5.05	0.00	0.00	1.13	1.13	0.00	0.26	0.26	—	1,140	1,140	0.05	0.04	1.73	1,156	
Vendor	0.04	0.02	0.65	0.30	< 0.005	0.01	0.15	0.16	< 0.005	0.04	0.05	—	564	564	0.02	0.08	0.66	589	
Hauling	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	0.00	
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Worker	0.07	0.06	0.08	0.92	0.00	0.00	0.21	0.21	0.00	0.05	0.05	—	189	189	0.01	0.01	0.29	191	
Vendor	0.01	< 0.005	0.12	0.06	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	93.4	93.4	< 0.005	0.01	0.11	97.6	
Hauling	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	0.00	

3.11. Architectural Coating (2026) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.19	0.16	1.14	1.51	< 0.005	0.03	—	0.03	0.03	—	0.03	—	178	178	0.01	< 0.005	—	179
Architect ural Coatings	—	14.3	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	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	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.19	0.16	1.14	1.51	< 0.005	0.03	—	0.03	0.03	—	0.03	—	178	178	0.01	< 0.005	—	179
Architect ural Coatings	—	14.3	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	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	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.09	0.08	0.54	0.72	< 0.005	0.01	—	0.01	0.01	—	0.01	—	84.4	84.4	< 0.005	< 0.005	—	84.7
Architect ural Coatings	—	6.77	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	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	0.00

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.01	0.10	0.13	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	14.0	14.0	< 0.005	< 0.005	—	14.0
Architectural Coatings	—	1.24	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	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	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	1.04	0.92	0.97	16.1	0.00	0.00	3.27	3.27	0.00	0.77	0.77	—	3,387	3,387	0.14	0.12	11.5	3,437
Vendor	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	0.00
Hauling	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	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	1.04	0.91	1.09	13.8	0.00	0.00	3.27	3.27	0.00	0.77	0.77	—	3,211	3,211	0.15	0.12	0.30	3,250
Vendor	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	0.00
Hauling	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	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.49	0.43	0.56	6.84	0.00	0.00	1.53	1.53	0.00	0.36	0.36	—	1,544	1,544	0.07	0.06	2.35	1,565
Vendor	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	0.00
Hauling	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	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.09	0.08	0.10	1.25	0.00	0.00	0.28	0.28	0.00	0.07	0.07	—	256	256	0.01	0.01	0.39	259
Vendor	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	0.00
Hauling	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	0.00

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	4.63	4.22	3.01	34.5	0.08	0.05	7.37	7.42	0.05	1.87	1.92	—	8,206	8,206	0.41	0.33	27.6	8,341
Unenclosed Parking with Elevator	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	0.00
High Turnover (Sit Down Restaurant)	2.63	2.40	1.69	19.3	0.04	0.03	4.10	4.13	0.03	1.04	1.07	—	4,573	4,573	0.23	0.18	15.4	4,649
Total	7.26	6.63	4.70	53.8	0.12	0.08	11.5	11.6	0.07	2.91	2.99	—	12,778	12,778	0.64	0.51	43.0	12,990
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	4.58	4.17	3.30	31.9	0.08	0.05	7.37	7.42	0.05	1.87	1.92	—	7,864	7,864	0.43	0.35	0.72	7,979
Unenclosed Parking with Elevator	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	0.00

High Turnover (Sit Down Restaurnart)	2.60	2.37	1.85	17.9	0.04	0.03	4.10	4.13	0.03	1.04	1.07	—	4,382	4,382	0.24	0.19	0.40	4,447
Total	7.18	6.54	5.15	49.8	0.12	0.08	11.5	11.6	0.07	2.91	2.99	—	12,247	12,247	0.67	0.54	1.11	12,425
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartme nts High Rise	0.80	0.72	0.58	5.72	0.01	0.01	1.29	1.30	0.01	0.33	0.34	—	1,262	1,262	0.07	0.05	1.89	1,282
Unenclos ed Parking with Elevator	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	0.00
High Turnover (Sit Down Restaurnart)	0.35	0.33	0.20	1.94	< 0.005	< 0.005	0.37	0.37	< 0.005	0.09	0.10	—	367	367	0.03	0.02	0.54	374
Total	1.15	1.05	0.78	7.66	0.02	0.01	1.66	1.67	0.01	0.42	0.43	—	1,629	1,629	0.09	0.07	2.43	1,656

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartme nts High Rise	—	—	—	—	—	—	—	—	—	—	—	—	1,801	1,801	0.13	0.02	—	1,810

Unenclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—	—	—	981	981	0.07	0.01	—	986
High Turnover (Sit Down Restaurant)	—	—	—	—	—	—	—	—	—	—	—	—	324	324	0.02	< 0.005	—	326
Total	—	—	—	—	—	—	—	—	—	—	—	—	3,106	3,106	0.22	0.03	—	3,121
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	—	1,801	1,801	0.13	0.02	—	1,810
Unenclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—	—	—	981	981	0.07	0.01	—	986
High Turnover (Sit Down Restaurant)	—	—	—	—	—	—	—	—	—	—	—	—	324	324	0.02	< 0.005	—	326
Total	—	—	—	—	—	—	—	—	—	—	—	—	3,106	3,106	0.22	0.03	—	3,121
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	—	298	298	0.02	< 0.005	—	300
Unenclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—	—	—	162	162	0.01	< 0.005	—	163

High Turnover (Sit Down Restaurart)	—	—	—	—	—	—	—	—	—	—	—	—	53.7	53.7	< 0.005	< 0.005	—	53.9
Total	—	—	—	—	—	—	—	—	—	—	—	—	514	514	0.04	0.01	—	517

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	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
Unenclosed Parking with Elevator	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
High Turnover (Sit Down Restaurart)	0.01	0.01	0.13	0.11	< 0.005	0.01	—	0.01	0.01	—	0.01	—	160	160	0.01	< 0.005	—	160
Total	0.01	0.01	0.13	0.11	< 0.005	0.01	—	0.01	0.01	—	0.01	—	160	160	0.01	< 0.005	—	160
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	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

Unenclosed Parking with Elevator	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
High Turnover (Sit Down Restaurant)	0.01	0.01	0.13	0.11	< 0.005	0.01	—	0.01	0.01	—	0.01	—	160	160	0.01	< 0.005	—	160
Total	0.01	0.01	0.13	0.11	< 0.005	0.01	—	0.01	0.01	—	0.01	—	160	160	0.01	< 0.005	—	160
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	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
Unenclosed Parking with Elevator	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
High Turnover (Sit Down Restaurant)	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	26.4	26.4	< 0.005	< 0.005	—	26.5
Total	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	26.4	26.4	< 0.005	< 0.005	—	26.5

4.3. Area Emissions by Source

4.3.2. Unmitigated

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

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	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

Consum Products	—	8.39	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architect ural Coatings	—	0.68	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscap e Equipme nt	3.00	2.81	0.23	24.7	< 0.005	0.02	—	0.02	0.02	—	0.02	—	77.9	77.9	< 0.005	< 0.005	—	78.1
Total	3.00	11.9	0.23	24.7	< 0.005	0.02	—	0.02	0.02	—	0.02	0.00	77.9	77.9	< 0.005	< 0.005	—	78.1
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	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
Consum er Products	—	8.39	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architect ural Coatings	—	0.68	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	0.00	9.07	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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	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
Consum er Products	—	1.53	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architect ural Coatings	—	0.12	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscap e Equipme nt	0.38	0.35	0.03	3.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	8.83	8.83	< 0.005	< 0.005	—	8.86
Total	0.38	2.01	0.03	3.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	0.00	8.83	8.83	< 0.005	< 0.005	—	8.86

4.4. Water Emissions by Land Use

4.4.2. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	20.7	142	163	2.13	0.05	—	232
Unenclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
High Turnover (Sit Down Restaurant)	—	—	—	—	—	—	—	—	—	—	—	3.06	20.6	23.6	0.32	0.01	—	33.8
Total	—	—	—	—	—	—	—	—	—	—	—	23.8	163	187	2.45	0.06	—	266
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	20.7	142	163	2.13	0.05	—	232
Unenclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00

High Turnover (Sit Down Restaurart)	—	—	—	—	—	—	—	—	—	—	—	3.06	20.6	23.6	0.32	0.01	—	33.8
Total	—	—	—	—	—	—	—	—	—	—	—	23.8	163	187	2.45	0.06	—	266
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartme nts High Rise	—	—	—	—	—	—	—	—	—	—	—	3.43	23.6	27.0	0.35	0.01	—	38.4
Unenclos ed Parking with Elevator	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
High Turnover (Sit Down Restaurart)	—	—	—	—	—	—	—	—	—	—	—	0.51	3.40	3.91	0.05	< 0.005	—	5.59
Total	—	—	—	—	—	—	—	—	—	—	—	3.94	27.0	30.9	0.41	0.01	—	44.0

4.5. Waste Emissions by Land Use

4.5.2. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartme nts High Rise	—	—	—	—	—	—	—	—	—	—	—	91.4	0.00	91.4	9.14	0.00	—	320

Unenclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
High Turnover (Sit Down Restaurant)	—	—	—	—	—	—	—	—	—	—	—	33.7	0.00	33.7	3.37	0.00	—	118
Total	—	—	—	—	—	—	—	—	—	—	—	125	0.00	125	12.5	0.00	—	438
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	91.4	0.00	91.4	9.14	0.00	—	320
Unenclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
High Turnover (Sit Down Restaurant)	—	—	—	—	—	—	—	—	—	—	—	33.7	0.00	33.7	3.37	0.00	—	118
Total	—	—	—	—	—	—	—	—	—	—	—	125	0.00	125	12.5	0.00	—	438
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	15.1	0.00	15.1	1.51	0.00	—	53.0
Unenclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00

High Turnover (Sit Down Restuarart)	—	—	—	—	—	—	—	—	—	—	—	5.59	0.00	5.59	0.56	0.00	—	19.5
Total	—	—	—	—	—	—	—	—	—	—	—	20.7	0.00	20.7	2.07	0.00	—	72.5

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2.77	2.77
High Turnover (Sit Down Restuarart)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	8.22	8.22
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	11.0	11.0
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2.77	2.77
High Turnover (Sit Down Restuarart)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	8.22	8.22
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	11.0	11.0

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.46	0.46
High Turnover (Sit Down Restaurart)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.36	1.36
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.82	1.82

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

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

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

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

Equipme Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

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

Equipme nt Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

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

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

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

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

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

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Sequest	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Remove d	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Excavation	Grading	1/1/2024	4/26/2024	5.00	85.0	—
Piles	Grading	4/27/2024	6/28/2024	5.00	45.0	—
Building Construction	Building Construction	6/29/2024	5/29/2026	5.00	500	—
Architectural Coating	Architectural Coating	1/1/2026	8/31/2026	5.00	173	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Excavation	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Excavation	Tractors/Loaders/Backhoes	Diesel	Average	2.00	7.00	84.0	0.37
Excavation	Excavators	Diesel	Average	2.00	8.00	158	0.38
Excavation	Rollers	Diesel	Average	1.00	8.00	36.0	0.38
Piles	Tractors/Loaders/Backhoes	Diesel	Average	1.00	8.00	84.0	0.37
Piles	Bore/Drill Rigs	Diesel	Average	1.00	8.00	221	0.50

Piles	Cement and Mortar Mixers	Diesel	Average	1.00	8.00	10.0	0.56
Piles	Cranes	Diesel	Average	1.00	8.00	367	0.29
Piles	Excavators	Diesel	Average	1.00	8.00	158	0.38
Piles	Pumps	Diesel	Average	1.00	8.00	11.0	0.74
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	1.00	8.00	84.0	0.37
Building Construction	Cranes	Diesel	Average	1.00	8.00	367	0.29
Building Construction	Forklifts	Diesel	Average	1.00	8.00	82.0	0.20
Building Construction	Welders	Diesel	Average	3.00	8.00	46.0	0.45
Architectural Coating	Air Compressors	Diesel	Average	1.00	8.00	37.0	0.48

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Excavation	—	—	—	—
Excavation	Worker	40.0	18.5	LDA,LDT1,LDT2
Excavation	Vendor	—	10.2	HHDT,MHDT
Excavation	Hauling	67.2	40.0	HHDT
Excavation	Onsite truck	125	0.10	HHDT
Piles	—	—	—	—
Piles	Worker	50.0	18.5	LDA,LDT1,LDT2
Piles	Vendor	—	10.2	HHDT,MHDT
Piles	Hauling	0.00	20.0	HHDT
Piles	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	300	18.5	LDA,LDT1,LDT2

Building Construction	Vendor	62.0	10.2	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	250	18.5	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	10.2	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Control Strategies Applied	PM10 Reduction	PM2.5 Reduction
Sweep paved roads once per month	9%	9%

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	783,489	261,163	7,890	2,630	—

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (Cubic Yards)	Material Exported (Cubic Yards)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Excavation	—	45,670	42.5	0.00	—
Piles	—	—	0.00	0.00	—

5.6.2. Construction Earthmoving Control Strategies

Control Strategies Applied	Frequency (per day)	PM10 Reduction	PM2.5 Reduction
Water Exposed Area	3	74%	74%

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Apartments High Rise	—	0%
Unenclosed Parking with Elevator	0.00	100%
High Turnover (Sit Down Restaurant)	0.00	0%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2024	0.00	690	0.05	0.01
2025	0.00	690	0.05	0.01
2026	0.00	690	0.05	0.01

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Apartments High Rise	1,290	1,314	1,041	459,238	10,211	10,394	8,238	3,633,645
Unenclosed Parking with Elevator	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
High Turnover (Sit Down Restaurant)	590	644	750	226,532	1,823	4,967	5,788	1,035,982

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

Hearth Type	Unmitigated (number)
Apartments High Rise	—
Wood Fireplaces	0
Gas Fireplaces	0
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	0
Conventional Wood Stoves	0
Catalytic Wood Stoves	0
Non-Catalytic Wood Stoves	0
Pellet Wood Stoves	0

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
783488.7	261,163	7,890	2,630	—

5.10.3. Landscape Equipment

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

5.11. Operational Energy Consumption

5.11.1. Unmitigated

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

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Apartments High Rise	952,213	690	0.0489	0.0069	0.00
Unenclosed Parking with Elevator	518,749	690	0.0489	0.0069	0.00
High Turnover (Sit Down Restaurant)	171,319	690	0.0489	0.0069	498,278

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Apartments High Rise	10,809,402	320,865
Unenclosed Parking with Elevator	0.00	0.00
High Turnover (Sit Down Restaurant)	1,596,587	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Apartments High Rise	170	—
Unenclosed Parking with Elevator	0.00	—
High Turnover (Sit Down Restaurant)	62.6	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Apartments High Rise	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Apartments High Rise	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00
High Turnover (Sit Down Restaurant)	Household refrigerators and/or freezers	R-134a	1,430	0.00	0.60	0.00	1.00
High Turnover (Sit Down Restaurant)	Other commercial A/C and heat pumps	R-410A	2,088	1.80	4.00	4.00	18.0
High Turnover (Sit Down Restaurant)	Walk-in refrigerators and freezers	R-404A	3,922	< 0.005	7.50	7.50	20.0

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

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

5.16.1. Emergency Generators and Fire Pumps

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

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

Equipment Type	Fuel Type
—	—

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

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

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
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5.18.2. Sequestration

5.18.2.1. Unmitigated

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

6.1. Climate Risk Summary

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

Climate Hazard	Result for Project Location	Unit
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Temperature and Extreme Heat	5.68	annual days of extreme heat
Extreme Precipitation	5.50	annual days with precipitation above 20 mm
Sea Level Rise	0.00	meters of inundation depth
Wildfire	0.00	annual hectares burned

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

Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about $\frac{3}{4}$ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider different increments of sea level rise coupled with extreme storm events. Users may select from four model simulations to view the range in potential inundation depth for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 50 meters (m) by 50 m, or about 164 feet (ft) by 164 ft.

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

6.2. Initial Climate Risk Scores

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

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

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

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

6.3. Adjusted Climate Risk Scores

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

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

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

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

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

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

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	50.5
AQ-PM	66.3
AQ-DPM	44.4
Drinking Water	92.5
Lead Risk Housing	71.7

Pesticides	0.00
Toxic Releases	76.5
Traffic	74.0
Effect Indicators	—
CleanUp Sites	2.07
Groundwater	81.3
Haz Waste Facilities/Generators	55.4
Impaired Water Bodies	0.00
Solid Waste	0.00
Sensitive Population	—
Asthma	25.8
Cardio-vascular	20.3
Low Birth Weights	59.2
Socioeconomic Factor Indicators	—
Education	34.4
Housing	65.6
Linguistic	61.5
Poverty	37.0
Unemployment	45.8

7.2. Healthy Places Index Scores

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

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	67.2783267
Employed	85.57679969
Median HI	73.27088413

Education	—
Bachelor's or higher	94.03310663
High school enrollment	100
Preschool enrollment	95.7141024
Transportation	—
Auto Access	44.50147568
Active commuting	69.44693956
Social	—
2-parent households	96.27871166
Voting	62.94110099
Neighborhood	—
Alcohol availability	30.38624407
Park access	11.24085718
Retail density	74.11779802
Supermarket access	83.40818683
Tree canopy	43.69305787
Housing	—
Homeownership	26.07468241
Housing habitability	52.43166945
Low-inc homeowner severe housing cost burden	66.53406904
Low-inc renter severe housing cost burden	53.66354421
Uncrowded housing	58.11625818
Health Outcomes	—
Insured adults	43.44924933
Arthritis	67.1
Asthma ER Admissions	86.6
High Blood Pressure	59.0

Cancer (excluding skin)	30.9
Asthma	61.7
Coronary Heart Disease	72.1
Chronic Obstructive Pulmonary Disease	76.7
Diagnosed Diabetes	84.4
Life Expectancy at Birth	87.5
Cognitively Disabled	98.4
Physically Disabled	96.1
Heart Attack ER Admissions	86.4
Mental Health Not Good	72.2
Chronic Kidney Disease	79.8
Obesity	59.8
Pedestrian Injuries	81.0
Physical Health Not Good	74.9
Stroke	70.4
Health Risk Behaviors	—
Binge Drinking	25.3
Current Smoker	74.7
No Leisure Time for Physical Activity	88.3
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	27.6
Elderly	70.8
English Speaking	72.5
Foreign-born	27.8
Outdoor Workers	83.6

Climate Change Adaptive Capacity	—
Impervious Surface Cover	17.7
Traffic Density	79.7
Traffic Access	87.4
Other Indices	—
Hardship	16.6
Other Decision Support	—
2016 Voting	56.1

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	51.0
Healthy Places Index Score for Project Location (b)	82.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

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

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

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Land Use	See Note A.1
Construction: Construction Phases	See Note A.2
Construction: Off-Road Equipment	See Note A.3
Construction: Trips and VMT	See Note A.4
Operations: Hearths	See Note A.5
Construction: On-Road Fugitive Dust	See Note A.4
Operations: Energy Use	See Note A.5

1050 La Cienega - Haul Day Detailed Report

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

5.1. Construction Schedule

5.2. Off-Road Equipment

5.2.1. Unmitigated

5.3. Construction Vehicles

5.3.1. Unmitigated

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

5.5. Architectural Coatings

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

5.6.2. Construction Earthmoving Control Strategies

5.7. Construction Paving

5.8. Construction Electricity Consumption and Emissions Factors

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

5.18.2. Sequestration

5.18.2.1. Unmitigated

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

6.2. Initial Climate Risk Scores

6.3. Adjusted Climate Risk Scores

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

7.2. Healthy Places Index Scores

7.3. Overall Health & Equity Scores

7.4. Health & Equity Measures

7.5. Evaluation Scorecard

7.6. Health & Equity Custom Measures

8. User Changes to Default Data

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	1050 La Cienega - Haul Day
Construction Start Date	1/1/2024
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.70
Precipitation (days)	19.6
Location	34.05832889311324, -118.37599786778935
County	Los Angeles-South Coast
City	Los Angeles
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	4323
EDFZ	16
Electric Utility	Los Angeles Department of Water & Power
Gas Utility	Southern California Gas
App Version	2022.1.1.13

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Other Non-Asphalt Surfaces	1.83	Acre	1.83	0.00	0.00	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

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

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.95	1.13	45.1	23.3	0.24	0.58	9.89	10.5	0.57	2.68	3.25	—	36,480	36,480	1.79	5.61	2.16	38,200
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.01	< 0.005	0.13	0.06	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	100.0	100.0	< 0.005	0.02	0.10	105
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	—	16.5	16.5	< 0.005	< 0.005	0.02	17.3

2.2. Construction Emissions by Year, Unmitigated

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

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	2.95	1.13	45.1	23.3	0.24	0.58	9.89	10.5	0.57	2.68	3.25	—	36,480	36,480	1.79	5.61	2.16	38,200

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.01	< 0.005	0.13	0.06	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	100.0	100.0	< 0.005	0.02	0.10	105
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	—	16.5	16.5	< 0.005	< 0.005	0.02	17.3

3. Construction Emissions Details

3.1. Grading (2024) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.43	0.36	2.83	6.53	0.01	0.14	—	0.14	0.13	—	0.13	—	1,118	1,118	0.05	0.01	—	1,122
Dust From Material Movement	—	—	—	—	—	—	0.10	0.10	—	0.02	0.02	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.06	3.06	< 0.005	< 0.005	—	3.07

Dust From Material Movement:	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.51	0.51	< 0.005	< 0.005	—	0.51
Dust From Material Movement:	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.20	0.18	0.23	2.55	0.00	0.00	0.52	0.52	0.00	0.12	0.12	—	535	535	0.02	0.02	0.06	542
Vendor	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	0.00
Hauling	2.31	0.58	42.1	14.2	0.23	0.44	9.27	9.71	0.44	2.54	2.98	—	34,827	34,827	1.72	5.58	2.10	36,536
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.49	1.49	< 0.005	< 0.005	< 0.005	1.51
Vendor	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	0.00
Hauling	0.01	< 0.005	0.12	0.04	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	95.4	95.4	< 0.005	0.02	0.10	100
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.25	0.25	< 0.005	< 0.005	< 0.005	0.25
Vendor	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	0.00

Hauling	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	15.8	15.8	< 0.005	< 0.005	0.02	16.6
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4. Operations Emissions Details

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

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

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

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

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

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

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

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

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Remove d	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequest ered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Remove d	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Grading	Grading	1/1/2024	1/1/2024	5.00	1.00	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Grading	Excavators	Diesel	Average	2.00	8.00	158	0.38

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Grading	—	—	—	—
Grading	Worker	40.0	18.5	LDA,LDT1,LDT2
Grading	Vendor	—	10.2	HHDT,MHDT
Grading	Hauling	250	40.0	HHDT
Grading	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Control Strategies Applied	PM10 Reduction	PM2.5 Reduction
Sweep paved roads once per month	9%	9%

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (Cubic Yards)	Material Exported (Cubic Yards)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Grading	—	1,750	0.00	0.00	—

5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Other Non-Asphalt Surfaces	1.83	0%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2024	0.00	690	0.05	0.01

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

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

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
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5.18.2. Sequestration

5.18.2.1. Unmitigated

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

6.1. Climate Risk Summary

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

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	5.68	annual days of extreme heat
Extreme Precipitation	5.50	annual days with precipitation above 20 mm
Sea Level Rise	0.00	meters of inundation depth
Wildfire	0.00	annual hectares burned

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

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

Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider different increments of sea level rise coupled with extreme storm events. Users may select from four model simulations to view the range in potential inundation depth for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 50 meters (m) by 50 m, or about 164 feet (ft) by 164 ft.

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

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	N/A	N/A	N/A	N/A

Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

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

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

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

6.3. Adjusted Climate Risk Scores

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

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

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

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

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

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

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	50.5
AQ-PM	66.3
AQ-DPM	44.4
Drinking Water	92.5
Lead Risk Housing	71.7
Pesticides	0.00
Toxic Releases	76.5
Traffic	74.0
Effect Indicators	—
CleanUp Sites	2.07
Groundwater	81.3
Haz Waste Facilities/Generators	55.4
Impaired Water Bodies	0.00
Solid Waste	0.00
Sensitive Population	—
Asthma	25.8
Cardio-vascular	20.3
Low Birth Weights	59.2
Socioeconomic Factor Indicators	—
Education	34.4
Housing	65.6
Linguistic	61.5
Poverty	37.0
Unemployment	45.8

7.2. Healthy Places Index Scores

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

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	67.2783267
Employed	85.57679969
Median HI	73.27088413
Education	—
Bachelor's or higher	94.03310663
High school enrollment	100
Preschool enrollment	95.7141024
Transportation	—
Auto Access	44.50147568
Active commuting	69.44693956
Social	—
2-parent households	96.27871166
Voting	62.94110099
Neighborhood	—
Alcohol availability	30.38624407
Park access	11.24085718
Retail density	74.11779802
Supermarket access	83.40818683
Tree canopy	43.69305787
Housing	—
Homeownership	26.07468241
Housing habitability	52.43166945
Low-inc homeowner severe housing cost burden	66.53406904

Low-inc renter severe housing cost burden	53.66354421
Uncrowded housing	58.11625818
Health Outcomes	—
Insured adults	43.44924933
Arthritis	67.1
Asthma ER Admissions	86.6
High Blood Pressure	59.0
Cancer (excluding skin)	30.9
Asthma	61.7
Coronary Heart Disease	72.1
Chronic Obstructive Pulmonary Disease	76.7
Diagnosed Diabetes	84.4
Life Expectancy at Birth	87.5
Cognitively Disabled	98.4
Physically Disabled	96.1
Heart Attack ER Admissions	86.4
Mental Health Not Good	72.2
Chronic Kidney Disease	79.8
Obesity	59.8
Pedestrian Injuries	81.0
Physical Health Not Good	74.9
Stroke	70.4
Health Risk Behaviors	—
Binge Drinking	25.3
Current Smoker	74.7
No Leisure Time for Physical Activity	88.3
Climate Change Exposures	—

Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	27.6
Elderly	70.8
English Speaking	72.5
Foreign-born	27.8
Outdoor Workers	83.6
Climate Change Adaptive Capacity	—
Impervious Surface Cover	17.7
Traffic Density	79.7
Traffic Access	87.4
Other Indices	—
Hardship	16.6
Other Decision Support	—
2016 Voting	56.1

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	51.0
Healthy Places Index Score for Project Location (b)	82.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

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

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

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Construction: Construction Phases	See Note B.1
Construction: Off-Road Equipment	See Note B.2
Construction: Trips and VMT	See Note B.3

Revised 1050 La Cienega Project

CalEEMod Notes

- Note A.1** Land use information was based on information provided by the Project applicant.
- Note A.2** Construction phases were based on information provided by the Project applicant.
- Note A.3** Construction equipment was based on information provided by the Project applicant.
- Note A.4** Construction trips, VMT, and other assumptions were estimated based on information provided by the Project applicant.
- Note A.5** The Project would not contain hearths. The Project's residences would be all-electric and would not contain natural gas connections.
- Note B.1** This analysis estimates emissions associated with a haul day.
- Note B.2** Construction equipment assumptions are for the haul day scenario.
- Note B.3** Construction trips were estimated based on information provided by the Project applicant. A one-way haul length of 40 miles was conservatively assumed to accommodate different regional landfills or receiving locations.

July 20, 2023

Carmel Partners
429 Santa Monica Boulevard, Suite 700
Santa Monica, California 90401
Attn: Will Cipes

Re: 1050 La Cienega Boulevard Project - Supplement to the Construction Health Risk Assessment

Mr. Cipes:

At your direction, Air Quality Dynamics prepared a supplement to the health risk assessment (HRA) submitted in August 2022 for the Sustainable Communities Environmental Assessment (SCEA) quantifying the impact of diesel particulate matter (DPM) associated with the generation of off-road equipment emissions during construction of the proposed project.

This supplemental analysis was completed to provide a comparison of construction emissions and predicted carcinogenic risk and noncarcinogenic hazard estimates utilizing version 2022.1.1.14 of the California Emissions Estimator Model (CalEEMod) which was the current application when the model was executed on 7/17/2023 and has replaced version 2020.4.0 which served as the basis for the emission, carcinogenic risk and noncarcinogenic hazard estimates in the original HRA.

CalEEMod is an emissions model developed in cooperation with air quality management and air pollution control districts throughout the state that provides a uniform platform quantifying pollutant emissions associated with project construction and operation. The model is considered a comprehensive tool for quantifying air quality impacts for land use development projects.

Originally developed in 2011, CalEEMod has undergone periodic updates to incorporate new regulatory standards, methodologies for estimating stationary source emissions and emission factors for both on and off-road mobile sources. Version 2022.1.1.14 is the latest update to CalEEMod utilizing a web-based platform to provide enhanced analysis of pollutant emissions in support of local governments to address climate change, public health and equity.

Results of the comparative analysis showed carcinogenic risk and noncarcinogenic hazard estimates to be lower for the maximum exposed residential and school-based receptors than previously reported in the original HRA.

The following provides comparison tables which illustrate average daily emission estimates, carcinogenic risks and noncarcinogenic hazards associated with the above referenced CalEEMod emission estimates.

Source Characterization

Tables 1 and 2 provide a summary of average daily particulate emissions associated with each identified construction phase and year. Construction phase timelines for both model versions were commensurate. Notwithstanding, start/end dates were revised to reflect construction activity assessed in the original HRA from 1/2/23 through 8/29/25 to 1/1/24 through 8/31/26 for emissions generated with CalEEMod version 2022.1.1.14. As noted in the original HRA, off-road PM₁₀ exhaust estimates are used as a surrogate for DPM emissions.

Attachment B presents the emission calculation worksheet used to quantify pollutant source strength for the revised CalEEMod emission scenario. Excerpts from the CalEEMod output file which identify construction phase timelines and associated emission rates are provided in Attachment C.

Table 1
Average Daily Emissions/PM₁₀
CalEEMod Version 2020.4.1

Construction Phase/Year	Emissions (Lbs/Day)
Excavation/2023	0.6934
Piles/2023	0.5258
Building Construction/2023	0.5973
Building Construction/2024	0.5255
Building Construction/Architectural Coating/2025	0.5282
Architectural Coating/2025	0.0687
Average Emissions	0.5172

Table 2
Average Daily Emissions/PM₁₀
CalEEMod Version 2022.1.1.14

Construction Phase/Year	Emissions (Lbs/Day)
Excavation/2024	0.7420
Piles/2024	0.3979
Building Construction/2024	0.4029
Building Construction/2025	0.3534
Building Construction/Architectural Coating/2026	0.3439
Architectural Coating/2026	0.0309
Average Emissions	0.3811

Risk Characterization

Tables 3 through 7 present the comparative carcinogenic risk estimates for the maximum exposed residential and school-based receptors.

Table 3
Carcinogenic Risk / Maximum Exposed Residential Receptor / South Alfred Street

CalEEMod Version	Risk
2020.4.0	9.1E-06
2022.1.1.14	6.7E-06

Note: 9.1E-06 denotes an excess case of cancer of 0.91 in one hundred thousand (100,000) individuals exposed. 6.7E-06 denotes an excess case of cancer of 0.67 in one hundred thousand (100,000) individuals exposed.

Table 4
Carcinogenic Risk / Beverly Park Senior Apartments

CalEEMod Version	Risk
2020.4.0	4.9E-07
2022.1.1.14	3.6E-07

Note: 4.9E-07 denotes an excess case of cancer of 0.049 in one hundred thousand (100,000) individuals exposed. 3.6E-07 denotes an excess case of cancer of 0.036 in one hundred thousand (100,000) individuals exposed.

Table 5
Carcinogenic Risk / Pressman Academy / Early Childhood Center

CalEEMod Version	Risk
2020.4.0	4.7E-06
2022.1.1.14	3.5E-06

Note: 4.7E-06 denotes an excess case of cancer of 0.47 in one hundred thousand (100,000) individuals exposed. 3.5E-06 denotes an excess case of cancer of 0.35 in one hundred thousand (100,000) individuals exposed.

Table 6
Carcinogenic Risk / Pressman Academy / Elementary School

CalEEMod Version	Risk
2020.4.0	4.7E-06
2022.1.1.14	3.5E-06

Note: 4.7E-06 denotes an excess case of cancer of 0.47 in one hundred thousand (100,000) individuals exposed. 3.5E-06 denotes an excess case of cancer of 0.35 in one hundred thousand (100,000) individuals exposed.

Table 7
Carcinogenic Risk / Pressman Academy / Middle School

CalEEMod Version	Risk
2020.4.0	3.9E-06
2022.1.1.14	2.8E-06

Note: 3.9E-06 denotes an excess case of cancer of 0.39 in one hundred thousand (100,000) individuals exposed. 2.8E-06 denotes an excess case of cancer of 0.28 in one hundred thousand (100,000) individuals exposed.

As noted above, the carcinogenic risks for the maximum exposed residential and school-based receptors are predicted to be lower than the original HRA estimates and below the significance threshold of one in one hundred thousand (1.0E-05).

Tables 8 through 10 presents the comparative noncarcinogenic hazard index values for the identified receptor locations.

Table 8
Noncarcinogenic Hazard / Maximum Exposed Residential Receptor / South Alfred Street

CalEEMod Version	Hazard
2020.4.0	7.8E-02
2022.1.1.14	5.7E-02

Note: 7.8E-02 and 5.7E-02 are commensurate with numeric values of 0.078 and 0.057, respectively.

Table 9
Noncarcinogenic Hazard / Beverly Park Senior Apartments

CalEEMod Version	Hazard
2020.4.0	1.6E-02
2022.1.1.14	1.2E-02

Note: 1.6E-02 and 1.2E-02 are commensurate with numeric values of 0.016 and 0.012, respectively.

Table 10
Noncarcinogenic Hazard / Pressman Academy

CalEEMod Version	Hazard
2020.4.0	8.2E-02
2022.1.1.14	6.0E-02

Note: 8.2E-02 and 6.0E-02 are commensurate with numeric values of 0.082 and 0.060, respectively.

As noted above, the hazard index values are predicted to be lower than the original HRA estimates and total less than the significance threshold of one (unity) for all receptor occupancies.

Attachment A, presents the carcinogenic risk and noncarcinogenic hazard worksheets for the revised CalEEMod emission scenario. The dispersion model output files associated with predicted DPM concentration estimates are presented in Attachment D.

Conclusion

The original HRA prepared for the proposed project determined that construction related emissions would not result in unacceptable localized impacts. Based upon the revised CalEEMod emission scenario using version 2022.1.1.14, the supplemental analysis demonstrates that construction of the proposed project would not result in unacceptable impacts and would produce lower carcinogenic risk and noncarcinogenic hazard estimates than reflected in the original CalEEMod emission scenario.

I can be reached at (818) 703-3294 should you have any questions or require additional information.

Sincerely,



Bill Piazza

- Attachment A: Carcinogenic Risk/Noncarcinogenic Hazard Calculation Worksheets
- Attachment B: Emission Calculation Worksheet
- Attachment C: CalEEMod Output File
- Attachment D: Dispersion Model Output Files
- Attachment E: List of References

ATTACHMENT A

Carcinogenic Risk/Noncarcinogenic Hazard Calculation Worksheets

Table A1
Quantification of Carcinogenic Risks and Noncarcinogenic Hazard
South Alfred Street / Maximum Exposed Residential Receptor (Third Trimester)

Source (a)	Mass GLC		Weight Fraction (d)	Contaminant (e)	Carcinogenic Risk				Noncarcinogenic Hazard		
	(ug/m ³) (b)	(mg/m ³) (c)			URF (ug/m ³) ⁻¹ (f)	CPF (mg/kg/day) ⁻¹ (g)	DOSE (mg/kg-day) (h)	RISK (i)	REL (ug/m ³) (j)	RfD (mg/kg/day) (k)	RESP (l)
	On-Site Exhaust	0.28593			2.86E-04	1.00E+00	Diesel Particulate	3.0E-04	1.1E+00	7.4E-05	2.4E-07
TOTAL								2.4E-07	5.7E-02		

Note:

Exposure factors used to calculate contaminant intake

exposure frequency (days/year)	261
exposure duration (years)	0.25
inhalation rate (L/kg-day)	361
inhalation absorption factor	1
averaging time (years)	70
fraction of time at home	0.85

Table A2
Quantification of Carcinogenic Risks and Noncarcinogenic Hazard
South Alfred Street / Maximum Exposed Residential Receptor (0 to 2 Year Age Group)

Source (a)	Mass GLC		Weight Fraction (d)	Contaminant (e)	Carcinogenic Risk				Noncarcinogenic Hazard		
	(ug/m ³) (b)	(mg/m ³) (c)			URF (ug/m ³) ⁻¹ (f)	CPF (mg/kg/day) ⁻¹ (g)	DOSE (mg/kg-day) (h)	RISK (i)	REL (ug/m ³) (j)	RfD (mg/kg/day) (k)	RESP (l)
	On-Site Exhaust	0.28593			2.86E-04	1.00E+00	Diesel Particulate	3.0E-04	1.1E+00	2.2E-04	5.7E-06
TOTAL								5.7E-06	5.7E-02		

Note:

Exposure factors used to calculate contaminant intake

exposure frequency (days/year)	261
exposure duration (years)	2
inhalation rate (L/kg-day)	1090
inhalation absorption factor	1
averaging time (years)	70
fraction of time at home	0.85

Table A3
Quantification of Carcinogenic Risks and Noncarcinogenic Hazard
South Alfred Street / Maximum Exposed Residential Receptor (2 to 9 Year Age Group)

Source (a)	Mass GLC		Weight Fraction (d)	Contaminant (e)	Carcinogenic Risk				Noncarcinogenic Hazard		
	(ug/m ³) (b)	(mg/m ³) (c)			URF (ug/m ³) ⁻¹ (f)	CPF (mg/kg/day) ⁻¹ (g)	DOSE (mg/kg-day) (h)	RISK (i)	REL (ug/m ³) (j)	RfD (mg/kg/day) (k)	RESP (l)
	On-Site Exhaust	0.28593			2.86E-04	1.00E+00	Diesel Particulate	3.0E-04	1.1E+00	1.8E-04	8.0E-07
TOTAL								8.0E-07	5.7E-02		

Note:

Exposure factors used to calculate contaminant intake

exposure frequency (days/year)	261
exposure duration (years)	0.42
inhalation rate (L/kg-day)	861
inhalation absorption factor	1
averaging time (years)	70
fraction of time at home	0.72

Table A4
Quantification of Carcinogenic Risks and Noncarcinogenic Hazard
Beverly Park Senior Apartments / Maximum Exposed Residential Receptor

Source (a)	Mass GLC		Weight Fraction (d)	Contaminant (e)	Carcinogenic Risk				Noncarcinogenic Hazard		
	(ug/m ³) (b)	(mg/m ³) (c)			URF (ug/m ³) ⁻¹ (f)	CPF (mg/kg/day) ⁻¹ (g)	DOSE (mg/kg-day) (h)	RISK (i)	REL (ug/m ³) (j)	RfD (mg/kg/day) (k)	RESP (l)
	On-Site Exhaust	0.05877			5.88E-05	1.00E+00	Diesel Particulate	3.0E-04	1.1E+00	1.2E-05	3.6E-07
TOTAL								3.6E-07	1.2E-02		

Note:

Exposure factors used to calculate contaminant intake

exposure frequency (days/year)	261
exposure duration (years)	2.67
inhalation rate (L/kg-day)	290
inhalation absorption factor	1
averaging time (years)	70
fraction of time at home	0.73

Table A5
Quantification of Carcinogenic Risks and Noncarcinogenic Hazard
Pressman Academy / Early Childhood Center (2 to 4 Year Age Group)

Source (a)	Mass GLC		Weight Fraction (d)	Contaminant (e)	Carcinogenic Risk				Noncarcinogenic Hazard		
	(ug/m ³) (b)	(mg/m ³) (c)			URF (ug/m ³) ⁻¹ (f)	CPF (mg/kg/day) ⁻¹ (g)	DOSE (mg/kg-day) (h)	RISK (i)	REL (ug/m ³) (j)	RfD (mg/kg/day) (k)	RESP (l)
	On-Site Exhaust	0.29872			2.99E-04	1.00E+00	Diesel Particulate	3.0E-04	1.1E+00	8.7E-05	3.5E-06
TOTAL								3.5E-06	6.0E-02		

Note:

Exposure factors used to calculate contaminant intake

exposure frequency (days/year)	166
exposure duration (years)	2.67
inhalation rate (L/kg-day)	640
inhalation absorption factor	1
averaging time (years)	70
fraction of time at home	1

Table A6
Quantification of Carcinogenic Risks and Noncarcinogenic Hazard
Pressman Academy / Elementary School (5 to 10 Year Age Group)

Source (a)	Mass GLC		Weight Fraction (d)	Contaminant (e)	Carcinogenic Risk				Noncarcinogenic Hazard		
	(ug/m ³) (b)	(mg/m ³) (c)			URF (ug/m ³) ⁻¹ (f)	CPF (mg/kg/day) ⁻¹ (g)	DOSE (mg/kg-day) (h)	RISK (i)	REL (ug/m ³) (j)	RfD (mg/kg/day) (k)	RESP (l)
	On-Site Exhaust	0.29872			2.99E-04	1.00E+00	Diesel Particulate	3.0E-04	1.1E+00	8.7E-05	3.5E-06
TOTAL								3.5E-06	6.0E-02		

Note:

Exposure factors used to calculate contaminant intake

exposure frequency (days/year)	166
exposure duration (years)	2.67
inhalation rate (L/kg-day)	640
inhalation absorption factor	1
averaging time (years)	70
fraction of time at home	1

Table A7
 Quantification of Carcinogenic Risks and Noncarcinogenic Hazard
 Pressman Academy / Middle School (11 to 13 Year Age Group)

Source (a)	Mass GLC		Weight Fraction (d)	Contaminant (e)	Carcinogenic Risk				Noncarcinogenic Hazard		
	(ug/m ³) (b)	(mg/m ³) (c)			URF (ug/m ³) ⁻¹ (f)	CPF (mg/kg/day) ⁻¹ (g)	DOSE (mg/kg-day) (h)	RISK (i)	REL (ug/m ³) (j)	RfD (mg/kg/day) (k)	RESP (l)
	On-Site Exhaust	0.29872			2.99E-04	1.00E+00	Diesel Particulate	3.0E-04	1.1E+00	7.1E-05	2.8E-06
TOTAL								2.8E-06	6.0E-02		

Note:

Exposure factors used to calculate contaminant intake

exposure frequency (days/year)	166
exposure duration (years)	2.67
inhalation rate (L/kg-day))	520
inhalation absorption factor	1
averaging time (years)	70
fraction of time at home	1

ATTACHMENT B

Emission Calculation Worksheet

Emission Calculation Worksheet
 CalEEMod Version 2022.1.1.14

Emissions	Phase	Start/End Dates	Lb/Day	# Days	Emissions
On-Site	Excavation	01/01/24 to 04/26/24	0.7420	85	63.0738
Exhaust PM10	Piles	04/27/24 to 06/28/24	0.3979	45	17.9036
	Building Construction	06/29/24 to 12/31/24	0.4029	132	53.1864
	Building Construction	01/01/25 to 12/31/25	0.3534	261	92.2396
	Building Construction/Architectural Coating	01/01/26 to 05/29/26	0.3439	107	36.7953
	Architectural Coating	05/30/26 to 08/31/26	0.0309	66	2.0375
				696	265.2361
Average Daily Construction (Lb/Day)					0.3811
Exhaust PM10			Combustion mass	Combustion g/s/source	
	Combustion Sources	210	0.3811	2.8581E-05	

ATTACHMENT C

CalEEMod Output File

1. Basic Project Information

1.1 Basic Project Information

Data Field	Value
Project Name	1050 La Cienega
Construction Start Date	1/1/2024
Operational Year	2026
Lead Agency	
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.7
Precipitation (days)	19.6
Location	34.057609099216904, -118.37530267939933
County	Los Angeles-South Coast
City	Los Angeles
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	4323
EDFZ	16
Electric Utility	Los Angeles Department of Water & Power
Gas Utility	Southern California Gas
App Version	2022.1.1.14

5. Activity Data

5.1 Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase
Excavation	Grading	1/1/2024	4/26/2024	5	85
Piles	Grading	4/27/2024	6/28/2024	5	45
Building Construction	Building Construction	6/29/2024	5/29/2026	5	500
Architectural Coating	Architectural Coating	1/1/2026	8/31/2026	5	173

3. Construction Emissions Details

3.1 Grading (2024) - Unmitigated

Location	PM10E
Onsite	
Daily, Summer (Max)	
Off-Road Equipment	0.7420442101593165
Dust From Material Movement	
Onsite truck	0.000551155655
Daily, Winter (Max)	
Off-Road Equipment	0.7420442101593165
Dust From Material Movement	
Onsite truck	0.000551155655
Average Daily	
Off-Road Equipment	0.17280481606449838
Dust From Material Movement	
Onsite truck	0.0001283513169178082
Annual	
Off-Road Equipment	0.031536878931770956
Dust From Material Movement	
Onsite truck	0.0000234241153375
Offsite	
Daily, Summer (Max)	
Worker	0
Vendor	0
Hauling	0.08735492922541177
Daily, Winter (Max)	
Worker	0
Vendor	0
Hauling	0.08735492922541177
Average Daily	
Worker	0
Vendor	0
Hauling	0.02034292872372603
Annual	
Worker	0
Vendor	0
Hauling	0.0037125844920800006

3. Construction Emissions Details

3.3 Grading (2024) - Unmitigated

Location	PM10E
Onsite	
Daily, Summer (Max)	
Off-Road Equipment	0.39785751467879327
Dust From Material Movement	
Onsite truck	0
Daily, Winter (Max)	
Average Daily	
Off-Road Equipment	0.04905092646724849
Dust From Material Movement	
Onsite truck	0
Annual	
Off-Road Equipment	0.00895179408027285
Dust From Material Movement	
Onsite truck	0
Offsite	
Daily, Summer (Max)	
Worker	0
Vendor	0
Hauling	0
Daily, Winter (Max)	
Average Daily	
Worker	0
Vendor	0
Hauling	0
Annual	
Worker	0
Vendor	0
Hauling	0

3. Construction Emissions Details

3.5 Building Construction (2024) - Unmitigated

Location	PM10E
Onsite	
Daily, Summer (Max)	
Off-Road Equipment	0.40292729780374215
Onsite truck	0
Daily, Winter (Max)	
Off-Road Equipment	0.40292729780374215
Onsite truck	0
Average Daily	
Off-Road Equipment	0.14666238237083373
Onsite truck	0
Annual	
Off-Road Equipment	0.026765884782677156
Onsite truck	0
Offsite	
Daily, Summer (Max)	
Worker	0
Vendor	0.027899574756488087
Hauling	0
Daily, Winter (Max)	
Worker	0
Vendor	0.027899574756488087
Hauling	0
Average Daily	
Worker	0
Vendor	0.010155226819387053
Hauling	0
Annual	
Worker	0
Vendor	0.0018533288945381371
Hauling	0

3. Construction Emissions Details

3.7 Building Construction (2025) - Unmitigated

Location	PM10E
Onsite	
Daily, Summer (Max)	
Off-Road Equipment	0.3534085135154523
Onsite truck	0
Daily, Winter (Max)	
Off-Road Equipment	0.3534085135154523
Onsite truck	0
Average Daily	
Off-Road Equipment	0.25243465251103747
Onsite truck	0
Annual	
Off-Road Equipment	0.046069324083264335
Onsite truck	0
Offsite	
Daily, Summer (Max)	
Worker	0
Vendor	0.027899574756488087
Hauling	0
Daily, Winter (Max)	
Worker	0
Vendor	0.027899574756488087
Hauling	0
Average Daily	
Worker	0
Vendor	0.01992826768320578
Hauling	0
Annual	
Worker	0
Vendor	0.0036369088521850546
Hauling	0

3. Construction Emissions Details

3.9 Building Construction (2026) - Unmitigated

Location	PM10E
Onsite	
Daily, Summer (Max)	
Off-Road Equipment	0.31300962324736176
Onsite truck	0
Daily, Winter (Max)	
Off-Road Equipment	0.31300962324736176
Onsite truck	0
Average Daily	
Off-Road Equipment	0.0912689508098961
Onsite truck	0
Annual	
Off-Road Equipment	0.016656583522806037
Onsite truck	0
Offsite	
Daily, Summer (Max)	
Worker	0
Vendor	0.027899574756488087
Hauling	0
Daily, Winter (Max)	
Worker	0
Vendor	0.027899574756488087
Hauling	0
Average Daily	
Worker	0
Vendor	0.008135101054240165
Hauling	0
Annual	
Worker	0
Vendor	0.00148465594239883
Hauling	0

3. Construction Emissions Details

3.11 Architectural Coating (2026) - Unmitigated

Location	PM10E
Onsite	
Daily, Summer (Max)	
Off-Road Equipment	0.030871232223807585
Architectural Coatings	
Onsite truck	0
Daily, Winter (Max)	
Off-Road Equipment	0.030871232223807585
Architectural Coatings	
Onsite truck	0
Average Daily	
Off-Road Equipment	0.014632118286900581
Architectural Coatings	
Onsite truck	0
Annual	
Off-Road Equipment	0.002670361587359356
Architectural Coatings	
Onsite truck	0
Offsite	
Daily, Summer (Max)	
Worker	0
Vendor	0
Hauling	0
Daily, Winter (Max)	
Worker	0
Vendor	0
Hauling	0
Average Daily	
Worker	0
Vendor	0
Hauling	0
Annual	
Worker	0
Vendor	0
Hauling	0

ATTACHMENT D

Dispersion Model Output Files

**BEE-Line Software: (Version 12.09) data input file
** Model: AERMOD.EXE Input File Creation Date: 7/18/2023 Time: 1:11:40 PM
NO ECHO

*** Message Summary For AERMOD Model Setup ***

----- Summary of Total Messages -----

A Total of 0 Fatal Error Message(s)
A Total of 2 Warning Message(s)
A Total of 0 Informational Message(s)

***** FATAL ERROR MESSAGES *****
*** NONE ***

***** WARNING MESSAGES *****
ME W186 728 MEOPEN: THRESH_1MIN 1-min ASOS wind speed threshold used 0.50
ME W187 728 MEOPEN: ADJ_U* Option for Stable Low Winds used in AERMET

*** SETUP Finishes Successfully ***

*** AERMOD - VERSION 22112 *** ** 1050 La Cienega Boulevard Project / Residential Exposure Scenario *** 07/18/23
*** AERMET - VERSION 16216 *** ** Construction / Particulates (DPM) *** 13:11:47
PAGE 1

*** MODELOPTs: RegDFault CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** MODEL SETUP OPTIONS SUMMARY ***

** Model Options Selected:

- * Model Uses Regulatory DEFAULT Options
- * Model Is Setup For Calculation of Average CONCentration Values.
- * NO GAS DEPOSITION Data Provided.
- * NO PARTICLE DEPOSITION Data Provided.
- * Model Uses NO DRY DEPLETION. DDPLETE = F
- * Model Uses NO WET DEPLETION. WETDPLT = F
- * Stack-tip Downwash.
- * Model Accounts for ELEVated Terrain Effects.
- * Use Calms Processing Routine.
- * Use Missing Data Processing Routine.
- * No Exponential Decay.
- * Model Uses URBAN Dispersion Algorithm for the SBL for 210 Source(s),
for Total of 1 Urban Area(s):
Urban Population = 9818605.0 ; Urban Roughness Length = 1.000 m
- * Urban Roughness Length of 1.0 Meter Used.
- * ADJ_U* - Use ADJ_U* option for SBL in AERMET
- * CCVR_Sub - Meteorological data includes CCVR substitutions
- * TEMP_Sub - Meteorological data includes TEMP substitutions
- * Model Accepts FLAGPOLE Receptor . Heights.
- * The User Specified a Pollutant Type of: OTHER

**Model Calculates ANNUAL Averages Only

**This Run Includes: 210 Source(s); 1 Source Group(s); and 65 Receptor(s)

with: 0 POINT(s), including
0 POINTCAP(s) and 0 POINTHOR(s)
and: 210 VOLUME source(s)
and: 0 AREA type source(s)
and: 0 LINE source(s)
and: 0 RLINE/RLINEXT source(s)
and: 0 OPENPIT source(s)
and: 0 BUOYANT LINE source(s) with a total of 0 line(s)
and: 0 SWPOINT source(s)

**Model Set To Continue RUNning After the Setup Testing.

**The AERMET Input Meteorological Data Version Date: 16216

****Output Options Selected:**

Model Outputs Tables of ANNUAL Averages by Receptor
 Model Outputs External File(s) of High Values for Plotting (PLOTFILE Keyword)
 Model Outputs Separate Summary File of High Ranked Values (SUMMFILE Keyword)

****NOTE:** The Following Flags May Appear Following CONC Values: c for Calm Hours
 m for Missing Hours
 b for Both Calm and Missing Hours

****Misc. Inputs:** Base Elev. for Pot. Temp. Profile (m MSL) = 53.00 ; Decay Coef. = 0.000 ; Rot. Angle = 0.0
 Emission Units = GRAMS/SEC ; Emission Rate Unit Factor = 0.1000E+07
 Output Units = MICROGRAMS/M**3

****Approximate Storage Requirements of Model = 3.6 MB of RAM.**

****Input Runstream File:** E:\WD Passport\1050 la cienega blvd\model\SETUP1R1_2012-2016_OTHER.DTA
****Output Print File:** E:\WD Passport\1050 la cienega blvd\model\SETUP1R1_2012-2016_OTHER.LST

****File for Summary of Results:** E:\WD Passport\1050 la cienega blvd\model\SETUP1R1_2012-2016_OTHER.SUM

*** AERMOD - VERSION 22112 *** 1050 La Cienega Boulevard Project / Residential Exposure Scenario *** 07/18/23
 *** AERMET - VERSION 16216 *** Construction / Particulates (DPM) *** 13:11:47
 PAGE 2

*** MODELOPTs: RegDFault CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** VOLUME SOURCE DATA ***

SOURCE ID	NUMBER PART. CATS.	EMISSION RATE (GRAMS/SEC)	X (METERS)	Y (METERS)	BASE ELEV. (METERS)	RELEASE HEIGHT (METERS)	INIT. SY (METERS)	INIT. SZ (METERS)	URBAN SOURCE	EMISSION RATE SCALAR VARY BY
C_1	0	0.28581E-04	373011.0	3769377.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_2	0	0.28581E-04	373018.0	3769377.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_3	0	0.28581E-04	373025.0	3769377.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_4	0	0.28581E-04	373032.0	3769377.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_5	0	0.28581E-04	373039.0	3769377.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_6	0	0.28581E-04	373045.8	3769377.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_7	0	0.28581E-04	373011.0	3769382.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_8	0	0.28581E-04	373018.0	3769382.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_9	0	0.28581E-04	373025.0	3769382.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_10	0	0.28581E-04	373032.0	3769382.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_11	0	0.28581E-04	373039.0	3769382.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_12	0	0.28581E-04	373045.8	3769382.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_13	0	0.28581E-04	373011.0	3769387.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_14	0	0.28581E-04	373018.0	3769387.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_15	0	0.28581E-04	373025.0	3769387.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_16	0	0.28581E-04	373032.0	3769387.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_17	0	0.28581E-04	373039.0	3769387.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_18	0	0.28581E-04	373045.8	3769387.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_19	0	0.28581E-04	373011.0	3769392.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_20	0	0.28581E-04	373018.0	3769392.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_21	0	0.28581E-04	373025.0	3769392.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_22	0	0.28581E-04	373032.0	3769392.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_23	0	0.28581E-04	373039.0	3769392.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_24	0	0.28581E-04	373045.8	3769392.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_25	0	0.28581E-04	373011.0	3769397.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_26	0	0.28581E-04	373018.0	3769397.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_27	0	0.28581E-04	373025.0	3769397.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_28	0	0.28581E-04	373032.0	3769397.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_29	0	0.28581E-04	373039.0	3769397.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_30	0	0.28581E-04	373045.8	3769397.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_31	0	0.28581E-04	373011.0	3769402.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_32	0	0.28581E-04	373018.0	3769402.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_33	0	0.28581E-04	373025.0	3769402.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_34	0	0.28581E-04	373032.0	3769402.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_35	0	0.28581E-04	373039.0	3769402.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_36	0	0.28581E-04	373045.8	3769402.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_37	0	0.28581E-04	373011.0	3769407.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_38	0	0.28581E-04	373018.0	3769407.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_39	0	0.28581E-04	373025.0	3769407.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_40	0	0.28581E-04	373032.0	3769407.5	38.0	5.00	3.26	1.40	YES	HROFDY

*** MODELOPTs: RegDFault CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** VOLUME SOURCE DATA ***

SOURCE ID	PART. CATS.	EMISSION RATE (GRAMS/SEC)	X (METERS)	Y (METERS)	BASE ELEV. (METERS)	RELEASE HEIGHT (METERS)	INIT. SY (METERS)	INIT. SZ (METERS)	URBAN SOURCE	EMISSION RATE SCALAR VARY BY
C_201	0	0.28581E-04	373051.8	3769422.6	38.0	5.00	3.26	1.40	YES	HROFDY
C_202	0	0.28581E-04	373051.6	3769417.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_203	0	0.28581E-04	373051.5	3769412.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_204	0	0.28581E-04	373051.3	3769407.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_205	0	0.28581E-04	373051.3	3769402.3	38.0	5.00	3.26	1.40	YES	HROFDY
C_206	0	0.28581E-04	373051.0	3769397.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_207	0	0.28581E-04	373050.9	3769392.4	38.0	5.00	3.26	1.40	YES	HROFDY
C_208	0	0.28581E-04	373050.6	3769387.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_209	0	0.28581E-04	373050.5	3769382.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_210	0	0.28581E-04	373050.3	3769377.5	38.0	5.00	3.26	1.40	YES	HROFDY

*** MODELOPTs: RegDFault CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** SOURCE IDs DEFINING SOURCE GROUPS ***

SRCGROUP ID	SOURCE IDs																																																																																																																																																																																			
ALL	C_1	, C_2	, C_3	, C_4	, C_5	, C_6	, C_7	, C_8	,	C_9	, C_10	, C_11	, C_12	, C_13	, C_14	, C_15	, C_16	,	C_17	, C_18	, C_19	, C_20	, C_21	, C_22	, C_23	, C_24	,	C_25	, C_26	, C_27	, C_28	, C_29	, C_30	, C_31	, C_32	,	C_33	, C_34	, C_35	, C_36	, C_37	, C_38	, C_39	, C_40	,	C_41	, C_42	, C_43	, C_44	, C_45	, C_46	, C_47	, C_48	,	C_49	, C_50	, C_51	, C_52	, C_53	, C_54	, C_55	, C_56	,	C_57	, C_58	, C_59	, C_60	, C_61	, C_62	, C_63	, C_64	,	C_65	, C_66	, C_67	, C_68	, C_69	, C_70	, C_71	, C_72	,	C_73	, C_74	, C_75	, C_76	, C_77	, C_78	, C_79	, C_80	,	C_81	, C_82	, C_83	, C_84	, C_85	, C_86	, C_87	, C_88	,	C_89	, C_90	, C_91	, C_92	, C_93	, C_94	, C_95	, C_96	,	C_97	, C_98	, C_99	, C_100	, C_101	, C_102	, C_103	, C_104	,	C_105	, C_106	, C_107	, C_108	, C_109	, C_110	, C_111	, C_112	,	C_113	, C_114	, C_115	, C_116	, C_117	, C_118	, C_119	, C_120	,	C_121	, C_122	, C_123	, C_124	, C_125	, C_126	, C_127	, C_128	,	C_129	, C_130	, C_131	, C_132	, C_133	, C_134	, C_135	, C_136	,	C_137	, C_138	, C_139	, C_140	, C_141	, C_142	, C_143	, C_144	,	C_145	, C_146	, C_147	, C_148	, C_149	, C_150	, C_151	, C_152	,	C_153	, C_154	, C_155	, C_156	, C_157	, C_158	, C_159	, C_160	,

*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** SOURCE IDs DEFINING SOURCE GROUPS ***

SRCGROUP ID	SOURCE IDs								
-----	-----								
C_161	, C_162	, C_163	, C_164	, C_165	, C_166	, C_167	, C_168	, C_169	, C_170
C_177	, C_178	, C_179	, C_180	, C_181	, C_182	, C_183	, C_184	, C_185	, C_186
C_185	, C_186	, C_187	, C_188	, C_189	, C_190	, C_191	, C_192	, C_193	, C_194
C_193	, C_194	, C_195	, C_196	, C_197	, C_198	, C_199	, C_200	, C_201	, C_202
C_201	, C_202	, C_203	, C_204	, C_205	, C_206	, C_207	, C_208	, C_209	, C_210
C_209	, C_210	, C_211							

*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** SOURCE IDs DEFINED AS URBAN SOURCES ***

URBAN ID	URBAN POP	SOURCE IDs								
-----	-----	-----								
C_8	9818605.	C_1	, C_2	, C_3	, C_4	, C_5	, C_6	, C_7	, C_8	
C_9		, C_10	, C_11	, C_12	, C_13	, C_14	, C_15	, C_16	, C_17	
C_17		, C_18	, C_19	, C_20	, C_21	, C_22	, C_23	, C_24	, C_25	
C_25		, C_26	, C_27	, C_28	, C_29	, C_30	, C_31	, C_32	, C_33	
C_33		, C_34	, C_35	, C_36	, C_37	, C_38	, C_39	, C_40	, C_41	
C_41		, C_42	, C_43	, C_44	, C_45	, C_46	, C_47	, C_48	, C_49	
C_49		, C_50	, C_51	, C_52	, C_53	, C_54	, C_55	, C_56	, C_57	
C_57		, C_58	, C_59	, C_60	, C_61	, C_62	, C_63	, C_64	, C_65	
C_65		, C_66	, C_67	, C_68	, C_69	, C_70	, C_71	, C_72	, C_73	
C_73		, C_74	, C_75	, C_76	, C_77	, C_78	, C_79	, C_80	, C_81	
C_81		, C_82	, C_83	, C_84	, C_85	, C_86	, C_87	, C_88	, C_89	
C_89		, C_90	, C_91	, C_92	, C_93	, C_94	, C_95	, C_96	, C_97	
C_97		, C_98	, C_99	, C_100	, C_101	, C_102	, C_103	, C_104	, C_105	
C_105		, C_106	, C_107	, C_108	, C_109	, C_110	, C_111	, C_112	, C_113	
C_113		, C_114	, C_115	, C_116	, C_117	, C_118	, C_119	, C_120	, C_121	
C_121		, C_122	, C_123	, C_124	, C_125	, C_126	, C_127	, C_128	, C_129	
C_129		, C_130	, C_131	, C_132	, C_133	, C_134	, C_135	, C_136	, C_137	
C_137		, C_138	, C_139	, C_140	, C_141	, C_142	, C_143	, C_144	, C_145	

C_145 , C_146 , C_147 , C_148 , C_149 , C_150 , C_151 , C_152 ,
 C_153 , C_154 , C_155 , C_156 , C_157 , C_158 , C_159 , C_160 ,

*** AERMOD - VERSION 22112 *** *** 1050 La Cienega Boulevard Project / Residential Exposure Scenario *** 07/18/23
 *** AERMET - VERSION 16216 *** *** Construction / Particulates (DPM) *** 13:11:47
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*** MODELOPTs: RegDFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** SOURCE IDs DEFINED AS URBAN SOURCES ***

URBAN ID	URBAN POP	SOURCE IDs													
-----	-----	-----													
C_161	,	C_162	,	C_163	,	C_164	,	C_165	,	C_166	,	C_167	,	C_168	,
C_169	,	C_170	,	C_171	,	C_172	,	C_173	,	C_174	,	C_175	,	C_176	,
C_177	,	C_178	,	C_179	,	C_180	,	C_181	,	C_182	,	C_183	,	C_184	,
C_185	,	C_186	,	C_187	,	C_188	,	C_189	,	C_190	,	C_191	,	C_192	,
C_193	,	C_194	,	C_195	,	C_196	,	C_197	,	C_198	,	C_199	,	C_200	,
C_201	,	C_202	,	C_203	,	C_204	,	C_205	,	C_206	,	C_207	,	C_208	,
C_209	,	C_210	,												

*** AERMOD - VERSION 22112 *** *** 1050 La Cienega Boulevard Project / Residential Exposure Scenario *** 07/18/23
 *** AERMET - VERSION 16216 *** *** Construction / Particulates (DPM) *** 13:11:47
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*** MODELOPTs: RegDFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOURLY SCALAR	HOURLY SCALAR	HOURLY SCALAR	HOURLY SCALAR	HOURLY SCALAR	HOURLY SCALAR	HOURLY SCALAR	HOURLY SCALAR	HOURLY SCALAR	HOURLY SCALAR	HOURLY SCALAR
-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----
SOURCE ID = C_1 ; SOURCE TYPE = VOLUME :										
1 .00000E+00	2 .00000E+00	3 .00000E+00	4 .00000E+00	5 .00000E+00	6 .00000E+00	7 .00000E+00	8 .00000E+00	9 .10000E+01	10 .10000E+01	11 .10000E+01
12 .10000E+01	13 .10000E+01	14 .10000E+01	15 .10000E+01	16 .10000E+01	17 .00000E+00	18 .00000E+00	19 .00000E+00	20 .00000E+00	21 .00000E+00	22 .00000E+00
23 .00000E+00	24 .00000E+00									
SOURCE ID = C_2 ; SOURCE TYPE = VOLUME :										
1 .00000E+00	2 .00000E+00	3 .00000E+00	4 .00000E+00	5 .00000E+00	6 .00000E+00	7 .00000E+00	8 .00000E+00	9 .10000E+01	10 .10000E+01	11 .10000E+01
12 .10000E+01	13 .10000E+01	14 .10000E+01	15 .10000E+01	16 .10000E+01	17 .00000E+00	18 .00000E+00	19 .00000E+00	20 .00000E+00	21 .00000E+00	22 .00000E+00
23 .00000E+00	24 .00000E+00									
SOURCE ID = C_3 ; SOURCE TYPE = VOLUME :										
1 .00000E+00	2 .00000E+00	3 .00000E+00	4 .00000E+00	5 .00000E+00	6 .00000E+00	7 .00000E+00	8 .00000E+00	9 .10000E+01	10 .10000E+01	11 .10000E+01
12 .10000E+01	13 .10000E+01	14 .10000E+01	15 .10000E+01	16 .10000E+01	17 .00000E+00	18 .00000E+00	19 .00000E+00	20 .00000E+00	21 .00000E+00	22 .00000E+00
23 .00000E+00	24 .00000E+00									
SOURCE ID = C_4 ; SOURCE TYPE = VOLUME :										
1 .00000E+00	2 .00000E+00	3 .00000E+00	4 .00000E+00	5 .00000E+00	6 .00000E+00	7 .00000E+00	8 .00000E+00	9 .10000E+01	10 .10000E+01	11 .10000E+01
12 .10000E+01	13 .10000E+01	14 .10000E+01	15 .10000E+01	16 .10000E+01	17 .00000E+00	18 .00000E+00	19 .00000E+00	20 .00000E+00	21 .00000E+00	22 .00000E+00
23 .00000E+00	24 .00000E+00									
SOURCE ID = C_5 ; SOURCE TYPE = VOLUME :										
1 .00000E+00	2 .00000E+00	3 .00000E+00	4 .00000E+00	5 .00000E+00	6 .00000E+00	7 .00000E+00	8 .00000E+00	9 .10000E+01	10 .10000E+01	11 .10000E+01
12 .10000E+01	13 .10000E+01	14 .10000E+01	15 .10000E+01	16 .10000E+01	17 .00000E+00	18 .00000E+00	19 .00000E+00	20 .00000E+00	21 .00000E+00	22 .00000E+00
23 .00000E+00	24 .00000E+00									

*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
------	--------	------	--------	------	--------	------	--------	------	--------	------	--------

SOURCE ID = C_6 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_7 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_8 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_9 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_10 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
------	--------	------	--------	------	--------	------	--------	------	--------	------	--------

SOURCE ID = C_11 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_12 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_13 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00

19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_14 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_15 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

*** AERMOD - VERSION 22112 *** *** 1050 La Cienega Boulevard Project / Residential Exposure Scenario *** 07/18/23
*** AERMET - VERSION 16216 *** *** Construction / Particulates (DPM) *** 13:11:47
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*** MODELOPTs: RegDFault CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR

SOURCE ID = C_16 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_17 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_18 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_19 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_20 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

*** AERMOD - VERSION 22112 *** *** 1050 La Cienega Boulevard Project / Residential Exposure Scenario *** 07/18/23
*** AERMET - VERSION 16216 *** *** Construction / Particulates (DPM) *** 13:11:47
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*** MODELOPTs: RegDFault CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR

SOURCE ID = C_21 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01

13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_22 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_23 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_24 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_25 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

*** AERMOD - VERSION 22112 *** 1050 La Cienega Boulevard Project / Residential Exposure Scenario *** 07/18/23
*** AERMET - VERSION 16216 *** Construction / Particulates (DPM) *** 13:11:47
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*** MODELOPTs: RegDFault CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR

SOURCE ID = C_26 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_27 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_28 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_29 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_30 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_39 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_40 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

*** AERMOD - VERSION 22112 *** ** 1050 La Cienega Boulevard Project / Residential Exposure Scenario *** 07/18/23
*** AERMET - VERSION 16216 *** ** Construction / Particulates (DPM) *** 13:11:47
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*** MODELOPTs: RegDFault CONC Elev FLGPOL NODRYDPLT NOWETDPLT URBAN Adj_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

Hour	SCALAR	Hour	SCALAR	Hour	SCALAR	Hour	SCALAR	Hour	SCALAR	Hour	SCALAR
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SOURCE ID = C_41 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_42 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_43 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_44 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_45 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

*** AERMOD - VERSION 22112 *** ** 1050 La Cienega Boulevard Project / Residential Exposure Scenario *** 07/18/23
*** AERMET - VERSION 16216 *** ** Construction / Particulates (DPM) *** 13:11:47
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*** MODELOPTs: RegDFault CONC Elev FLGPOL NODRYDPLT NOWETDPLT URBAN Adj_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

Hour	SCALAR	Hour	SCALAR	Hour	SCALAR	Hour	SCALAR	Hour	SCALAR	Hour	SCALAR
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SOURCE ID = C_46 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_47 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_48 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_49 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_50 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

*** AERMOD - VERSION 22112 *** ** 1050 La Cienega Boulevard Project / Residential Exposure Scenario *** 07/18/23
*** AERMET - VERSION 16216 *** ** Construction / Particulates (DPM) *** 13:11:47
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*** MODELOPTs: RegDFault CONC ELEV FLGPOL NODRYPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR

SOURCE ID = C_51 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_52 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_53 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_54 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_55 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_64 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_65 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

*** AERMOD - VERSION 22112 *** ** 1050 La Cienega Boulevard Project / Residential Exposure Scenario *** 07/18/23
*** AERMET - VERSION 16216 *** ** Construction / Particulates (DPM) *** 13:11:47
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*** MODELOPTs: RegDFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR

SOURCE ID = C_66 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_67 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_68 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_69 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_70 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

*** AERMOD - VERSION 22112 *** ** 1050 La Cienega Boulevard Project / Residential Exposure Scenario *** 07/18/23
*** AERMET - VERSION 16216 *** ** Construction / Particulates (DPM) *** 13:11:47
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*** MODELOPTs: RegDFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR

SOURCE ID = C_71 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00

7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_72 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_73 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_74 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_75 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

*** AERMOD - VERSION 22112 *** *** 1050 La Cienega Boulevard Project / Residential Exposure Scenario *** 07/18/23
*** AERMET - VERSION 16216 *** *** Construction / Particulates (DPM) *** 13:11:47
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*** MODELOPTs: RegDFault CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR

SOURCE ID = C_76 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_77 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_78 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_79 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_80 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_89 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_90 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

*** AERMOD - VERSION 22112 *** 1050 La Cienega Boulevard Project / Residential Exposure Scenario 07/18/23
*** AERMET - VERSION 16216 *** Construction / Particulates (DPM) 13:11:47
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*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
------	--------	------	--------	------	--------	------	--------	------	--------	------	--------

SOURCE ID = C_91 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_92 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_93 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_94 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_95 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

*** AERMOD - VERSION 22112 *** 1050 La Cienega Boulevard Project / Residential Exposure Scenario 07/18/23
*** AERMET - VERSION 16216 *** Construction / Particulates (DPM) 13:11:47
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*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
------	--------	------	--------	------	--------	------	--------	------	--------	------	--------

SOURCE ID = C_96 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_97 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_98 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_99 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_100 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

*** AERMOD - VERSION 22112 *** *** 1050 La Cienega Boulevard Project / Residential Exposure Scenario *** 07/18/23
 *** AERMET - VERSION 16216 *** *** Construction / Particulates (DPM) *** 13:11:47
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*** MODELOPTs: RegDFault CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOURL	SCALAR	HOURL	SCALAR	HOURL	SCALAR	HOURL	SCALAR	HOURL	SCALAR	HOURL	SCALAR
-------	--------	-------	--------	-------	--------	-------	--------	-------	--------	-------	--------

SOURCE ID = C_101 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_102 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_103 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_104 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_105 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

 HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR

SOURCE ID = C_106 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_107 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_108 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_109 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_110 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

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SOURCE ID = C_111 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_112 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_113 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00

19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_114 ; SOURCE TYPE = VOLUME :

1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_115 ; SOURCE TYPE = VOLUME :

1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

*** AERMOD - VERSION 22112 *** ** 1050 La Cienega Boulevard Project / Residential Exposure Scenario *** 07/18/23
*** AERMET - VERSION 16216 *** ** Construction / Particulates (DPM) *** 13:11:47
*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U* PAGE 35

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR

SOURCE ID = C_116 ; SOURCE TYPE = VOLUME :

1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_117 ; SOURCE TYPE = VOLUME :

1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_118 ; SOURCE TYPE = VOLUME :

1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_119 ; SOURCE TYPE = VOLUME :

1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_120 ; SOURCE TYPE = VOLUME :

1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

*** AERMOD - VERSION 22112 *** ** 1050 La Cienega Boulevard Project / Residential Exposure Scenario *** 07/18/23
*** AERMET - VERSION 16216 *** ** Construction / Particulates (DPM) *** 13:11:47
*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U* PAGE 36

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR

SOURCE ID = C_121 ; SOURCE TYPE = VOLUME :

1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00

19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00
 SOURCE ID = C_122 ; SOURCE TYPE = VOLUME :
 1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
 7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
 13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_123 ; SOURCE TYPE = VOLUME :
 1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
 7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
 13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_124 ; SOURCE TYPE = VOLUME :
 1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
 7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
 13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_125 ; SOURCE TYPE = VOLUME :
 1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
 7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
 13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

*** AERMOD - VERSION 22112 *** ** 1050 La Cienega Boulevard Project / Residential Exposure Scenario *** 07/18/23
 *** AERMET - VERSION 16216 *** ** Construction / Particulates (DPM) *** 13:11:47
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*** MODELOPTs: RegDFault CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
SOURCE ID = C_126 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_127 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_128 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_129 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_130 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_139 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_140 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

*** AERMOD - VERSION 22112 *** 1050 La Cienega Boulevard Project / Residential Exposure Scenario 07/18/23
*** AERMET - VERSION 16216 *** Construction / Particulates (DPM) 13:11:47
PAGE 40

*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOURL	SCALAR	HOURL	SCALAR	HOURL	SCALAR	HOURL	SCALAR	HOURL	SCALAR	HOURL	SCALAR
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SOURCE ID = C_141 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_142 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_143 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_144 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_145 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

*** AERMOD - VERSION 22112 *** 1050 La Cienega Boulevard Project / Residential Exposure Scenario 07/18/23
*** AERMET - VERSION 16216 *** Construction / Particulates (DPM) 13:11:47
PAGE 41

*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOURL	SCALAR	HOURL	SCALAR	HOURL	SCALAR	HOURL	SCALAR	HOURL	SCALAR	HOURL	SCALAR
-------	--------	-------	--------	-------	--------	-------	--------	-------	--------	-------	--------

SOURCE ID = C_146 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

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SOURCE ID = C_147 ; SOURCE TYPE = VOLUME :
  1 .00000E+00  2 .00000E+00  3 .00000E+00  4 .00000E+00  5 .00000E+00  6 .00000E+00
  7 .00000E+00  8 .00000E+00  9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
 13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00
```

```
SOURCE ID = C_148 ; SOURCE TYPE = VOLUME :
  1 .00000E+00  2 .00000E+00  3 .00000E+00  4 .00000E+00  5 .00000E+00  6 .00000E+00
  7 .00000E+00  8 .00000E+00  9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
 13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00
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```
SOURCE ID = C_149 ; SOURCE TYPE = VOLUME :
  1 .00000E+00  2 .00000E+00  3 .00000E+00  4 .00000E+00  5 .00000E+00  6 .00000E+00
  7 .00000E+00  8 .00000E+00  9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
 13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00
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```
SOURCE ID = C_150 ; SOURCE TYPE = VOLUME :
  1 .00000E+00  2 .00000E+00  3 .00000E+00  4 .00000E+00  5 .00000E+00  6 .00000E+00
  7 .00000E+00  8 .00000E+00  9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
 13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00
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*** AERMOD - VERSION 22112 ***    *** 1050 La Cienega Boulevard Project / Residential Exposure Scenario ***    07/18/23
*** AERMET - VERSION 16216 ***    *** Construction / Particulates (DPM) ***                          ***    13:11:47
                                                                                                                                PAGE 42
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*** MODELOPTs: RegDFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*
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* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
------	--------	------	--------	------	--------	------	--------	------	--------	------	--------

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SOURCE ID = C_151 ; SOURCE TYPE = VOLUME :
  1 .00000E+00  2 .00000E+00  3 .00000E+00  4 .00000E+00  5 .00000E+00  6 .00000E+00
  7 .00000E+00  8 .00000E+00  9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
 13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00
```

```
SOURCE ID = C_152 ; SOURCE TYPE = VOLUME :
  1 .00000E+00  2 .00000E+00  3 .00000E+00  4 .00000E+00  5 .00000E+00  6 .00000E+00
  7 .00000E+00  8 .00000E+00  9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
 13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00
```

```
SOURCE ID = C_153 ; SOURCE TYPE = VOLUME :
  1 .00000E+00  2 .00000E+00  3 .00000E+00  4 .00000E+00  5 .00000E+00  6 .00000E+00
  7 .00000E+00  8 .00000E+00  9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
 13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00
```

```
SOURCE ID = C_154 ; SOURCE TYPE = VOLUME :
  1 .00000E+00  2 .00000E+00  3 .00000E+00  4 .00000E+00  5 .00000E+00  6 .00000E+00
  7 .00000E+00  8 .00000E+00  9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
 13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00
```

```
SOURCE ID = C_155 ; SOURCE TYPE = VOLUME :
  1 .00000E+00  2 .00000E+00  3 .00000E+00  4 .00000E+00  5 .00000E+00  6 .00000E+00
  7 .00000E+00  8 .00000E+00  9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
 13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00
```


*** MODELOPTs: RegDFault CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
SOURCE ID = C_156 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00
SOURCE ID = C_157 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00
SOURCE ID = C_158 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00
SOURCE ID = C_159 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

*** MODELOPTs: RegDFault CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
SOURCE ID = C_161 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00
SOURCE ID = C_162 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00
SOURCE ID = C_163 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_164 ; SOURCE TYPE = VOLUME :
 1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
 7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
 13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_165 ; SOURCE TYPE = VOLUME :
 1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
 7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
 13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

*** AERMOD - VERSION 22112 *** ** 1050 La Cienega Boulevard Project / Residential Exposure Scenario *** 07/18/23
 *** AERMET - VERSION 16216 *** ** Construction / Particulates (DPM) *** 13:11:47
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*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
------	--------	------	--------	------	--------	------	--------	------	--------	------	--------

SOURCE ID = C_166 ; SOURCE TYPE = VOLUME :
 1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
 7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
 13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_167 ; SOURCE TYPE = VOLUME :
 1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
 7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
 13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_168 ; SOURCE TYPE = VOLUME :
 1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
 7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
 13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_169 ; SOURCE TYPE = VOLUME :
 1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
 7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
 13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_170 ; SOURCE TYPE = VOLUME :
 1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
 7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
 13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

*** AERMOD - VERSION 22112 *** ** 1050 La Cienega Boulevard Project / Residential Exposure Scenario *** 07/18/23
 *** AERMET - VERSION 16216 *** ** Construction / Particulates (DPM) *** 13:11:47
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*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
------	--------	------	--------	------	--------	------	--------	------	--------	------	--------

SOURCE ID = C_171 ; SOURCE TYPE = VOLUME :
 1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
 7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
 13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_172 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_173 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_174 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_175 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

*** AERMOD - VERSION 22112 *** ** 1050 La Cienega Boulevard Project / Residential Exposure Scenario *** 07/18/23
*** AERMET - VERSION 16216 *** ** Construction / Particulates (DPM) *** 13:11:47
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*** MODELOPTs: RegDFault CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR

SOURCE ID = C_176 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_177 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_178 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_179 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_180 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

*** MODELOPTs: RegDFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
SOURCE ID = C_181 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_182 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_183 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_184 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_185 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

*** MODELOPTs: RegDFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
SOURCE ID = C_186 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_187 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_188 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_189 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_190 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

*** AERMOD - VERSION 22112 *** ** 1050 La Cienega Boulevard Project / Residential Exposure Scenario *** 07/18/23
*** AERMET - VERSION 16216 *** ** Construction / Particulates (DPM) *** 13:11:47
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*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOURL	SCALAR	HOURL	SCALAR	HOURL	SCALAR	HOURL	SCALAR	HOURL	SCALAR	HOURL	SCALAR
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SOURCE ID = C_191 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_192 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_193 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_194 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_195 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

*** AERMOD - VERSION 22112 *** ** 1050 La Cienega Boulevard Project / Residential Exposure Scenario *** 07/18/23
*** AERMET - VERSION 16216 *** ** Construction / Particulates (DPM) *** 13:11:47
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*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOURL	SCALAR	HOURL	SCALAR	HOURL	SCALAR	HOURL	SCALAR	HOURL	SCALAR	HOURL	SCALAR
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SOURCE ID = C_196 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_197 ; SOURCE TYPE = VOLUME :
 1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
 7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
 13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_198 ; SOURCE TYPE = VOLUME :
 1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
 7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
 13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_199 ; SOURCE TYPE = VOLUME :
 1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
 7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
 13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_200 ; SOURCE TYPE = VOLUME :
 1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
 7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
 13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

*** AERMOD - VERSION 22112 *** ** 1050 La Cienega Boulevard Project / Residential Exposure Scenario *** 07/18/23
 *** AERMET - VERSION 16216 *** ** Construction / Particulates (DPM) *** 13:11:47
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*** MODELOPTs: RegDFault CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
------	--------	------	--------	------	--------	------	--------	------	--------	------	--------

SOURCE ID = C_201 ; SOURCE TYPE = VOLUME :
 1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
 7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
 13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_202 ; SOURCE TYPE = VOLUME :
 1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
 7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
 13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_203 ; SOURCE TYPE = VOLUME :
 1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
 7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
 13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_204 ; SOURCE TYPE = VOLUME :
 1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
 7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
 13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_205 ; SOURCE TYPE = VOLUME :
 1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
 7 .00000E+00 8 .00000E+00 9 .10000E+01 10 .10000E+01 11 .10000E+01 12 .10000E+01
 13 .10000E+01 14 .10000E+01 15 .10000E+01 16 .10000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
SOURCE ID = C_206 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_207 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_208 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_209 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_210 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.10000E+01	10	.10000E+01	11	.10000E+01	12	.10000E+01
13	.10000E+01	14	.10000E+01	15	.10000E+01	16	.10000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** DISCRETE CARTESIAN RECEPTORS ***
 (X-COORD, Y-COORD, ZELEV, ZHILL, ZFLAG)
 (METERS)

(373065.2, 3769342.8,	39.0,	39.0,	2.0);	(373065.2, 3769351.4,	39.0,	39.0,	2.0);
(373065.2, 3769359.2,	39.0,	39.0,	2.0);	(373065.2, 3769366.9,	39.0,	39.0,	2.0);
(373065.6, 3769374.2,	39.0,	39.0,	2.0);	(373065.6, 3769382.0,	39.0,	39.0,	2.0);
(373065.6, 3769389.3,	39.0,	39.0,	2.0);	(373066.0, 3769397.5,	39.0,	39.0,	2.0);
(373066.0, 3769406.1,	39.0,	39.0,	2.0);	(373066.5, 3769414.2,	39.0,	39.0,	2.0);
(373066.5, 3769421.5,	39.0,	39.0,	2.0);	(373066.7, 3769429.8,	39.0,	39.0,	2.0);
(373066.9, 3769437.5,	39.0,	39.0,	2.0);	(373067.3, 3769444.8,	39.0,	39.0,	2.0);
(373067.6, 3769453.0,	39.0,	39.0,	2.0);	(373067.6, 3769461.0,	39.0,	39.0,	2.0);
(373067.8, 3769468.9,	39.0,	39.0,	2.0);	(373068.2, 3769477.5,	39.0,	39.0,	2.0);
(373068.2, 3769485.2,	39.0,	39.0,	2.0);	(373068.4, 3769493.7,	39.0,	39.0,	2.0);
(373068.6, 3769502.4,	39.0,	39.0,	2.0);	(373068.9, 3769509.9,	39.0,	39.0,	2.0);
(373069.1, 3769517.9,	39.0,	39.0,	2.0);	(373069.3, 3769526.4,	39.0,	39.0,	2.0);
(373069.6, 3769534.2,	39.0,	39.0,	2.0);	(373069.9, 3769542.0,	39.0,	39.0,	2.0);
(373070.4, 3769550.2,	39.0,	39.0,	2.0);	(373070.8, 3769558.3,	39.0,	39.0,	2.0);
(373071.2, 3769565.6,	39.0,	39.0,	2.0);	(373071.6, 3769573.4,	39.0,	39.0,	2.0);
(373072.4, 3769581.5,	39.0,	39.0,	2.0);	(373072.9, 3769588.8,	39.0,	39.0,	2.0);
(373085.0, 3769586.3,	39.0,	39.0,	2.0);	(373096.2, 3769584.5,	39.0,	39.0,	2.0);
(372943.4, 3769387.5,	39.0,	39.0,	2.0);	(372943.4, 3769378.0,	39.0,	39.0,	2.0);
(372943.4, 3769368.0,	39.0,	39.0,	2.0);	(372951.8, 3769387.5,	39.0,	39.0,	2.0);
(372951.9, 3769376.9,	39.0,	39.0,	2.0);	(372951.8, 3769367.0,	39.0,	39.0,	2.0);
(372960.2, 3769387.5,	39.0,	39.0,	2.0);	(372960.4, 3769376.2,	39.0,	39.0,	2.0);

12 01 01 1 19 -13.2 0.163 -9.000 -9.000 -999. 157. 29.4 0.17 2.20 1.00 1.77 225. 10.1 285.9 2.0
12 01 01 1 20 -5.7 0.106 -9.000 -9.000 -999. 83. 18.6 0.17 2.20 1.00 1.18 182. 10.1 284.9 2.0
12 01 01 1 21 -999.0 -9.000 -9.000 -9.000 -999. -999. -99999.0 0.17 2.20 1.00 0.00 0. 10.1 284.2 2.0
12 01 01 1 22 -7.3 0.119 -9.000 -9.000 -999. 99. 21.1 0.17 2.20 1.00 1.33 202. 10.1 285.4 2.0
12 01 01 1 23 -6.0 0.108 -9.000 -9.000 -999. 86. 19.1 0.17 2.20 1.00 1.21 251. 10.1 284.9 2.0
12 01 01 1 24 -5.4 0.102 -9.000 -9.000 -999. 78. 18.0 0.17 2.20 1.00 1.14 224. 10.1 284.2 2.0

First hour of profile data

YR MO DY HR HEIGHT F WDIR WSPD AMB_TMP sigmaA sigmaW sigmaV
12 01 01 01 10.1 1 131. 1.26 283.2 99.0 -99.00 -99.00

F indicates top of profile (=1) or below (=0)

*** AERMOD - VERSION 22112 *** ** 1050 La Cienega Boulevard Project / Residential Exposure Scenario *** 07/18/23
*** AERMET - VERSION 16216 *** ** Construction / Particulates (DPM) *** 13:11:47
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*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** THE ANNUAL AVERAGE CONCENTRATION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): C_1 , C_2 , C_3 , C_4 , C_5 ,
C_6 , C_7 , C_8 , C_9 , C_10 , C_11 , C_12 , C_13 ,
C_14 , C_15 , C_16 , C_17 , C_18 , C_19 , C_20 , C_21 ,
C_22 , C_23 , C_24 , C_25 , C_26 , C_27 , C_28 , . . . ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)	Y-COORD (M)	CONC
373065.20	3769342.80	0.02844	373065.20	3769351.40	0.03549
373065.20	3769359.20	0.04399	373065.20	3769366.90	0.05531
373065.60	3769374.20	0.07128	373065.60	3769382.00	0.10301
373065.60	3769389.30	0.14083	373066.00	3769397.50	0.17800
373066.00	3769406.10	0.21192	373066.50	3769414.20	0.23264
373066.50	3769421.50	0.24971	373066.70	3769429.80	0.26320
373066.90	3769437.50	0.27219	373067.30	3769444.80	0.27662
373067.60	3769453.00	0.28056	373067.60	3769461.00	0.28472
373067.80	3769468.90	0.28593	373068.20	3769477.50	0.28413
373068.20	3769485.20	0.28339	373068.40	3769493.70	0.27954
373068.60	3769502.40	0.27359	373068.90	3769509.90	0.26569
373069.10	3769517.90	0.25502	373069.30	3769526.40	0.23573
373069.60	3769534.20	0.20539	373069.90	3769542.00	0.17071
373070.40	3769550.20	0.13737	373070.80	3769558.30	0.11029
373071.20	3769565.60	0.09073	373071.60	3769573.40	0.07412
373072.40	3769581.50	0.06081	373072.90	3769588.80	0.05126
373085.00	3769586.30	0.05825	373096.20	3769584.50	0.06178
372943.40	3769387.50	0.02516	372943.40	3769378.00	0.02321
372943.40	3769368.00	0.02104	372951.80	3769387.50	0.02967
372951.90	3769376.90	0.02688	372951.80	3769367.00	0.02404
372960.20	3769387.50	0.03545	372960.40	3769376.20	0.03157
372960.20	3769366.00	0.02764	372968.60	3769387.50	0.04306
372968.60	3769375.50	0.03727	372968.60	3769365.10	0.03204
372935.00	3769397.00	0.02297	372943.40	3769397.00	0.02693
372951.80	3769397.00	0.03196	372960.20	3769397.00	0.03846
372968.60	3769397.00	0.04708	372977.00	3769397.00	0.05877
372977.00	3769388.20	0.05375	372977.00	3769379.40	0.04798
372977.00	3769370.60	0.04183	372977.00	3769361.80	0.03578
372977.00	3769353.00	0.03024	372968.60	3769354.20	0.02683
372960.20	3769355.40	0.02379	372951.80	3769356.60	0.02113
372943.40	3769357.80	0.01882	372935.00	3769359.00	0.01681
372935.00	3769368.50	0.01845	372935.00	3769378.00	0.02006
372935.00	3769387.50	0.02159			

*** AERMOD - VERSION 22112 *** ** 1050 La Cienega Boulevard Project / Residential Exposure Scenario *** 07/18/23
*** AERMET - VERSION 16216 *** ** Construction / Particulates (DPM) *** 13:11:47
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*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** THE SUMMARY OF MAXIMUM ANNUAL RESULTS AVERAGED OVER 5 YEARS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

GROUP ID	AVERAGE CONC	RECEPTOR (XR, YR, ZELEV, ZHILL, ZFLAG)	OF TYPE	NETWORK GRID-ID
ALL	1ST HIGHEST VALUE IS	0.28593 AT (373067.80, 3769468.90,	39.00, 39.00, 2.00)	DC
	2ND HIGHEST VALUE IS	0.28472 AT (373067.60, 3769461.00,	39.00, 39.00, 2.00)	DC
	3RD HIGHEST VALUE IS	0.28413 AT (373068.20, 3769477.50,	39.00, 39.00, 2.00)	DC
	4TH HIGHEST VALUE IS	0.28339 AT (373068.20, 3769485.20,	39.00, 39.00, 2.00)	DC
	5TH HIGHEST VALUE IS	0.28056 AT (373067.60, 3769453.00,	39.00, 39.00, 2.00)	DC
	6TH HIGHEST VALUE IS	0.27954 AT (373068.40, 3769493.70,	39.00, 39.00, 2.00)	DC
	7TH HIGHEST VALUE IS	0.27662 AT (373067.30, 3769444.80,	39.00, 39.00, 2.00)	DC
	8TH HIGHEST VALUE IS	0.27359 AT (373068.60, 3769502.40,	39.00, 39.00, 2.00)	DC
	9TH HIGHEST VALUE IS	0.27219 AT (373066.90, 3769437.50,	39.00, 39.00, 2.00)	DC
	10TH HIGHEST VALUE IS	0.26569 AT (373068.90, 3769509.90,	39.00, 39.00, 2.00)	DC

*** RECEPTOR TYPES: GC = GRIDCART
 GP = GRIDPOLR
 DC = DISCCART
 DP = DISCPOLR

*** AERMOD - VERSION 22112 *** *** 1050 La Cienega Boulevard Project / Residential Exposure Scenario *** 07/18/23
 *** AERMET - VERSION 16216 *** *** Construction / Particulates (DPM) *** 13:11:47
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*** MODELOPTs: RegDFault CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** Message Summary : AERMOD Model Execution ***

----- Summary of Total Messages -----

A Total of 0 Fatal Error Message(s)
 A Total of 2 Warning Message(s)
 A Total of 799 Informational Message(s)
 A Total of 43848 Hours Were Processed
 A Total of 455 Calm Hours Identified
 A Total of 344 Missing Hours Identified (0.78 Percent)

***** FATAL ERROR MESSAGES *****
 *** NONE ***

***** WARNING MESSAGES *****
 ME W186 728 MEOPEN: THRESH_1MIN 1-min ASOS wind speed threshold used 0.50
 ME W187 728 MEOPEN: ADJ_U* Option for Stable Low Winds used in AERMET

 *** AERMOD Finishes Successfully ***

**BEE-Line Software: (Version 12.09) data input file
** Model: AERMOD.EXE Input File Creation Date: 7/18/2023 Time: 1:16:39 PM
NO ECHO

*** Message Summary For AERMOD Model Setup ***

----- Summary of Total Messages -----

A Total of 0 Fatal Error Message(s)
A Total of 2 Warning Message(s)
A Total of 0 Informational Message(s)

***** FATAL ERROR MESSAGES *****
*** NONE ***

***** WARNING MESSAGES *****
ME W186 749 MEOPEN: THRESH_1MIN 1-min ASOS wind speed threshold used 0.50
ME W187 749 MEOPEN: ADJ_U* Option for Stable Low Winds used in AERMET

*** SETUP Finishes Successfully ***

*** AERMOD - VERSION 22112 *** ** 1050 La Cienega Boulevard Project / School Exposure Scenario *** 07/18/23
*** AERMET - VERSION 16216 *** ** Construction / Particulates (DPM) *** 13:16:43
PAGE 1

*** MODELOPTs: RegDFault CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** MODEL SETUP OPTIONS SUMMARY ***

** Model Options Selected:

- * Model Uses Regulatory DEFAULT Options
- * Model Is Setup For Calculation of Average CONCentration Values.
- * NO GAS DEPOSITION Data Provided.
- * NO PARTICLE DEPOSITION Data Provided.
- * Model Uses NO DRY DEPLETION. DDPLETE = F
- * Model Uses NO WET DEPLETION. WETDPLT = F
- * Stack-tip Downwash.
- * Model Accounts for ELEVated Terrain Effects.
- * Use Calms Processing Routine.
- * Use Missing Data Processing Routine.
- * No Exponential Decay.
- * Model Uses URBAN Dispersion Algorithm for the SBL for 210 Source(s),
for Total of 1 Urban Area(s):
Urban Population = 9818605.0 ; Urban Roughness Length = 1.000 m
- * Urban Roughness Length of 1.0 Meter Used.
- * ADJ_U* - Use ADJ_U* option for SBL in AERMET
- * CCVR_Sub - Meteorological data includes CCVR substitutions
- * TEMP_Sub - Meteorological data includes TEMP substitutions
- * Model Accepts FLAGPOLE Receptor . Heights.
- * The User Specified a Pollutant Type of: OTHER

**Model Calculates ANNUAL Averages Only

**This Run Includes: 210 Source(s); 1 Source Group(s); and 86 Receptor(s)

with: 0 POINT(s), including
0 POINTCAP(s) and 0 POINTHOR(s)
and: 210 VOLUME source(s)
and: 0 AREA type source(s)
and: 0 LINE source(s)
and: 0 RLINE/RLINEXT source(s)
and: 0 OPENPIT source(s)
and: 0 BUOYANT LINE source(s) with a total of 0 line(s)
and: 0 SWPOINT source(s)

**Model Set To Continue RUNning After the Setup Testing.

**The AERMET Input Meteorological Data Version Date: 16216

**Output Options Selected:

Model Outputs Tables of ANNUAL Averages by Receptor
 Model Outputs External File(s) of High Values for Plotting (PLOTFILE Keyword)
 Model Outputs Separate Summary File of High Ranked Values (SUMMFILE Keyword)

**NOTE: The Following Flags May Appear Following CONC Values: c for Calm Hours
 m for Missing Hours
 b for Both Calm and Missing Hours

**Misc. Inputs: Base Elev. for Pot. Temp. Profile (m MSL) = 53.00 ; Decay Coef. = 0.000 ; Rot. Angle = 0.0
 Emission Units = GRAMS/SEC ; Emission Rate Unit Factor = 0.1000E+07
 Output Units = MICROGRAMS/M**3

**Approximate Storage Requirements of Model = 3.6 MB of RAM.

**Input Runstream File: E:\WD Passport\1050 la cienega blvd\model\SETUP2R1_2012-2016_OTHER.DTA
 **Output Print File: E:\WD Passport\1050 la cienega blvd\model\SETUP2R1_2012-2016_OTHER.LST

**File for Summary of Results: E:\WD Passport\1050 la cienega blvd\model\SETUP2R1_2012-2016_OTHER.SUM

*** AERMOD - VERSION 22112 *** ** 1050 La Cienega Boulevard Project / School Exposure Scenario *** 07/18/23
 *** AERMET - VERSION 16216 *** ** Construction / Particulates (DPM) *** 13:16:43
 PAGE 2

*** MODELOPTs: RegDFault CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** VOLUME SOURCE DATA ***

SOURCE ID	NUMBER PART. CATS.	EMISSION RATE (GRAMS/SEC)	X (METERS)	Y (METERS)	BASE ELEV. (METERS)	RELEASE HEIGHT (METERS)	INIT. SY (METERS)	INIT. SZ (METERS)	URBAN SOURCE	EMISSION RATE SCALAR VARY BY
C_1	0	0.28581E-04	373011.0	3769377.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_2	0	0.28581E-04	373018.0	3769377.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_3	0	0.28581E-04	373025.0	3769377.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_4	0	0.28581E-04	373032.0	3769377.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_5	0	0.28581E-04	373039.0	3769377.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_6	0	0.28581E-04	373045.8	3769377.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_7	0	0.28581E-04	373011.0	3769382.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_8	0	0.28581E-04	373018.0	3769382.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_9	0	0.28581E-04	373025.0	3769382.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_10	0	0.28581E-04	373032.0	3769382.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_11	0	0.28581E-04	373039.0	3769382.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_12	0	0.28581E-04	373045.8	3769382.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_13	0	0.28581E-04	373011.0	3769387.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_14	0	0.28581E-04	373018.0	3769387.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_15	0	0.28581E-04	373025.0	3769387.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_16	0	0.28581E-04	373032.0	3769387.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_17	0	0.28581E-04	373039.0	3769387.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_18	0	0.28581E-04	373045.8	3769387.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_19	0	0.28581E-04	373011.0	3769392.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_20	0	0.28581E-04	373018.0	3769392.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_21	0	0.28581E-04	373025.0	3769392.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_22	0	0.28581E-04	373032.0	3769392.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_23	0	0.28581E-04	373039.0	3769392.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_24	0	0.28581E-04	373045.8	3769392.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_25	0	0.28581E-04	373011.0	3769397.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_26	0	0.28581E-04	373018.0	3769397.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_27	0	0.28581E-04	373025.0	3769397.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_28	0	0.28581E-04	373032.0	3769397.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_29	0	0.28581E-04	373039.0	3769397.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_30	0	0.28581E-04	373045.8	3769397.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_31	0	0.28581E-04	373011.0	3769402.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_32	0	0.28581E-04	373018.0	3769402.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_33	0	0.28581E-04	373025.0	3769402.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_34	0	0.28581E-04	373032.0	3769402.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_35	0	0.28581E-04	373039.0	3769402.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_36	0	0.28581E-04	373045.8	3769402.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_37	0	0.28581E-04	373011.0	3769407.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_38	0	0.28581E-04	373018.0	3769407.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_39	0	0.28581E-04	373025.0	3769407.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_40	0	0.28581E-04	373032.0	3769407.5	38.0	5.00	3.26	1.40	YES	HROFDY

*** AERMOD - VERSION 22112 *** 1050 La Cienega Boulevard Project / School Exposure Scenario
*** AERMET - VERSION 16216 *** Construction / Particulates (DPM)

*** 07/18/23
*** 13:16:43
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*** MODELOPTs: RegDFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** VOLUME SOURCE DATA ***

SOURCE ID	NUMBER PART. CATS.	EMISSION RATE (GRAMS/SEC)	X (METERS)	Y (METERS)	BASE ELEV. (METERS)	RELEASE HEIGHT (METERS)	INIT. SY (METERS)	INIT. SZ (METERS)	URBAN SOURCE	EMISSION RATE SCALAR VARY BY
C_41	0	0.28581E-04	373039.0	3769407.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_42	0	0.28581E-04	373045.8	3769407.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_43	0	0.28581E-04	373011.0	3769412.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_44	0	0.28581E-04	373018.0	3769412.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_45	0	0.28581E-04	373025.0	3769412.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_46	0	0.28581E-04	373032.0	3769412.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_47	0	0.28581E-04	373039.0	3769412.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_48	0	0.28581E-04	373045.8	3769412.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_49	0	0.28581E-04	373011.0	3769417.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_50	0	0.28581E-04	373018.0	3769417.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_51	0	0.28581E-04	373025.0	3769417.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_52	0	0.28581E-04	373032.0	3769417.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_53	0	0.28581E-04	373039.0	3769417.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_54	0	0.28581E-04	373045.8	3769417.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_55	0	0.28581E-04	373011.0	3769422.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_56	0	0.28581E-04	373018.0	3769422.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_57	0	0.28581E-04	373025.0	3769422.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_58	0	0.28581E-04	373032.0	3769422.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_59	0	0.28581E-04	373039.0	3769422.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_60	0	0.28581E-04	373045.8	3769422.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_61	0	0.28581E-04	373011.0	3769427.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_62	0	0.28581E-04	373018.0	3769427.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_63	0	0.28581E-04	373025.0	3769427.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_64	0	0.28581E-04	373032.0	3769427.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_65	0	0.28581E-04	373039.0	3769427.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_66	0	0.28581E-04	373045.8	3769427.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_67	0	0.28581E-04	373011.0	3769432.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_68	0	0.28581E-04	373018.0	3769432.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_69	0	0.28581E-04	373025.0	3769432.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_70	0	0.28581E-04	373032.0	3769432.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_71	0	0.28581E-04	373039.0	3769432.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_72	0	0.28581E-04	373045.8	3769432.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_73	0	0.28581E-04	373052.0	3769432.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_74	0	0.28581E-04	373011.0	3769437.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_75	0	0.28581E-04	373018.0	3769437.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_76	0	0.28581E-04	373025.0	3769437.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_77	0	0.28581E-04	373032.0	3769437.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_78	0	0.28581E-04	373039.0	3769437.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_79	0	0.28581E-04	373045.8	3769437.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_80	0	0.28581E-04	373052.2	3769437.3	38.0	5.00	3.26	1.40	YES	HROFDY

*** AERMOD - VERSION 22112 *** 1050 La Cienega Boulevard Project / School Exposure Scenario
*** AERMET - VERSION 16216 *** Construction / Particulates (DPM)

*** 07/18/23
*** 13:16:43
PAGE 4

*** MODELOPTs: RegDFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** VOLUME SOURCE DATA ***

SOURCE ID	NUMBER PART. CATS.	EMISSION RATE (GRAMS/SEC)	X (METERS)	Y (METERS)	BASE ELEV. (METERS)	RELEASE HEIGHT (METERS)	INIT. SY (METERS)	INIT. SZ (METERS)	URBAN SOURCE	EMISSION RATE SCALAR VARY BY
C_81	0	0.28581E-04	373011.0	3769442.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_82	0	0.28581E-04	373018.0	3769442.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_83	0	0.28581E-04	373025.0	3769442.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_84	0	0.28581E-04	373032.0	3769442.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_85	0	0.28581E-04	373039.0	3769442.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_86	0	0.28581E-04	373045.8	3769442.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_87	0	0.28581E-04	373052.4	3769442.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_88	0	0.28581E-04	373011.0	3769447.5	38.0	5.00	3.26	1.40	YES	HROFDY

C_89	0	0.28581E-04	373018.0	3769447.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_90	0	0.28581E-04	373025.0	3769447.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_91	0	0.28581E-04	373032.0	3769447.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_92	0	0.28581E-04	373039.0	3769447.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_93	0	0.28581E-04	373045.8	3769447.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_94	0	0.28581E-04	373052.6	3769447.6	38.0	5.00	3.26	1.40	YES	HROFDY
C_95	0	0.28581E-04	373011.0	3769452.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_96	0	0.28581E-04	373018.0	3769452.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_97	0	0.28581E-04	373025.0	3769452.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_98	0	0.28581E-04	373032.0	3769452.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_99	0	0.28581E-04	373039.0	3769452.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_100	0	0.28581E-04	373045.8	3769452.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_101	0	0.28581E-04	373052.6	3769452.6	38.0	5.00	3.26	1.40	YES	HROFDY
C_102	0	0.28581E-04	373011.0	3769457.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_103	0	0.28581E-04	373018.0	3769457.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_104	0	0.28581E-04	373025.0	3769457.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_105	0	0.28581E-04	373032.0	3769457.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_106	0	0.28581E-04	373039.0	3769457.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_107	0	0.28581E-04	373045.8	3769457.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_108	0	0.28581E-04	373052.6	3769457.6	38.0	5.00	3.26	1.40	YES	HROFDY
C_109	0	0.28581E-04	373011.0	3769462.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_110	0	0.28581E-04	373018.0	3769462.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_111	0	0.28581E-04	373025.0	3769462.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_112	0	0.28581E-04	373032.0	3769462.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_113	0	0.28581E-04	373039.0	3769462.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_114	0	0.28581E-04	373045.8	3769462.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_115	0	0.28581E-04	373053.0	3769462.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_116	0	0.28581E-04	373011.0	3769467.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_117	0	0.28581E-04	373018.0	3769467.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_118	0	0.28581E-04	373025.0	3769467.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_119	0	0.28581E-04	373032.0	3769467.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_120	0	0.28581E-04	373039.0	3769467.5	38.0	5.00	3.26	1.40	YES	HROFDY

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*** AERMOD - VERSION 22112 ***      *** 1050 La Cienega Boulevard Project / School Exposure Scenario      ***      07/18/23
*** AERMET - VERSION 16216 ***      *** Construction / Particulates (DPM)                    ***      13:16:43
*** MODELPTs:    RegDFault  CONC  ELEV  FLGPOL  NODRYDPLT  NOWETDPLT  URBAN  ADJ_U*                ***      PAGE 5

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*** VOLUME SOURCE DATA ***

SOURCE ID	NUMBER PART. CATS.	EMISSION RATE (GRAMS/SEC)	X (METERS)	Y (METERS)	BASE ELEV. (METERS)	RELEASE HEIGHT (METERS)	INIT. SY (METERS)	INIT. SZ (METERS)	URBAN SOURCE	EMISSION RATE SCALAR VARY BY
C_121	0	0.28581E-04	373045.8	3769467.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_122	0	0.28581E-04	373053.0	3769467.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_123	0	0.28581E-04	373011.0	3769472.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_124	0	0.28581E-04	373018.0	3769472.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_125	0	0.28581E-04	373025.0	3769472.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_126	0	0.28581E-04	373032.0	3769472.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_127	0	0.28581E-04	373039.0	3769472.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_128	0	0.28581E-04	373045.9	3769472.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_129	0	0.28581E-04	373053.0	3769472.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_130	0	0.28581E-04	373011.0	3769477.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_131	0	0.28581E-04	373018.0	3769477.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_132	0	0.28581E-04	373025.0	3769477.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_133	0	0.28581E-04	373032.0	3769477.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_134	0	0.28581E-04	373039.0	3769477.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_135	0	0.28581E-04	373045.9	3769477.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_136	0	0.28581E-04	373053.0	3769477.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_137	0	0.28581E-04	373011.0	3769482.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_138	0	0.28581E-04	373018.0	3769482.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_139	0	0.28581E-04	373025.0	3769482.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_140	0	0.28581E-04	373032.0	3769482.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_141	0	0.28581E-04	373039.0	3769482.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_142	0	0.28581E-04	373045.9	3769482.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_143	0	0.28581E-04	373053.0	3769482.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_144	0	0.28581E-04	373011.0	3769487.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_145	0	0.28581E-04	373018.0	3769487.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_146	0	0.28581E-04	373025.0	3769487.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_147	0	0.28581E-04	373032.0	3769487.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_148	0	0.28581E-04	373039.0	3769487.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_149	0	0.28581E-04	373045.9	3769487.5	38.0	5.00	3.26	1.40	YES	HROFDY

C_150	0	0.28581E-04	373053.0	3769487.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_151	0	0.28581E-04	373011.0	3769492.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_152	0	0.28581E-04	373018.0	3769492.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_153	0	0.28581E-04	373025.0	3769492.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_154	0	0.28581E-04	373032.0	3769492.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_155	0	0.28581E-04	373039.0	3769492.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_156	0	0.28581E-04	373045.9	3769492.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_157	0	0.28581E-04	373053.0	3769492.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_158	0	0.28581E-04	373011.0	3769497.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_159	0	0.28581E-04	373018.0	3769497.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_160	0	0.28581E-04	373025.0	3769497.5	38.0	5.00	3.26	1.40	YES	HROFDY

*** AERMOD - VERSION 22112 *** *** 1050 La Cienega Boulevard Project / School Exposure Scenario *** 07/18/23
 *** AERMET - VERSION 16216 *** *** Construction / Particulates (DPM) *** 13:16:43
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*** MODELOPTs: RegDFault CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** VOLUME SOURCE DATA ***

SOURCE ID	NUMBER PART. CATS.	EMISSION RATE (GRAMS/SEC)	X (METERS)	Y (METERS)	BASE ELEV. (METERS)	RELEASE HEIGHT (METERS)	INIT. SY (METERS)	INIT. SZ (METERS)	URBAN SOURCE	EMISSION RATE	
										SCALAR	VARY BY
C_161	0	0.28581E-04	373032.0	3769497.5	38.0	5.00	3.26	1.40	YES	HROFDY	
C_162	0	0.28581E-04	373039.0	3769497.5	38.0	5.00	3.26	1.40	YES	HROFDY	
C_163	0	0.28581E-04	373045.9	3769497.5	38.0	5.00	3.26	1.40	YES	HROFDY	
C_164	0	0.28581E-04	373053.0	3769497.5	38.0	5.00	3.26	1.40	YES	HROFDY	
C_165	0	0.28581E-04	373011.0	3769502.5	38.0	5.00	3.26	1.40	YES	HROFDY	
C_166	0	0.28581E-04	373018.0	3769502.5	38.0	5.00	3.26	1.40	YES	HROFDY	
C_167	0	0.28581E-04	373025.0	3769502.5	38.0	5.00	3.26	1.40	YES	HROFDY	
C_168	0	0.28581E-04	373032.0	3769502.5	38.0	5.00	3.26	1.40	YES	HROFDY	
C_169	0	0.28581E-04	373039.0	3769502.5	38.0	5.00	3.26	1.40	YES	HROFDY	
C_170	0	0.28581E-04	373045.9	3769502.5	38.0	5.00	3.26	1.40	YES	HROFDY	
C_171	0	0.28581E-04	373053.0	3769502.5	38.0	5.00	3.26	1.40	YES	HROFDY	
C_172	0	0.28581E-04	373011.0	3769507.5	38.0	5.00	3.26	1.40	YES	HROFDY	
C_173	0	0.28581E-04	373018.0	3769507.5	38.0	5.00	3.26	1.40	YES	HROFDY	
C_174	0	0.28581E-04	373025.0	3769507.5	38.0	5.00	3.26	1.40	YES	HROFDY	
C_175	0	0.28581E-04	373032.0	3769507.5	38.0	5.00	3.26	1.40	YES	HROFDY	
C_176	0	0.28581E-04	373039.0	3769507.5	38.0	5.00	3.26	1.40	YES	HROFDY	
C_177	0	0.28581E-04	373045.9	3769507.5	38.0	5.00	3.26	1.40	YES	HROFDY	
C_178	0	0.28581E-04	373053.0	3769507.5	38.0	5.00	3.26	1.40	YES	HROFDY	
C_179	0	0.28581E-04	373011.0	3769512.5	38.0	5.00	3.26	1.40	YES	HROFDY	
C_180	0	0.28581E-04	373018.0	3769512.5	38.0	5.00	3.26	1.40	YES	HROFDY	
C_181	0	0.28581E-04	373025.0	3769512.5	38.0	5.00	3.26	1.40	YES	HROFDY	
C_182	0	0.28581E-04	373032.0	3769512.5	38.0	5.00	3.26	1.40	YES	HROFDY	
C_183	0	0.28581E-04	373039.0	3769512.5	38.0	5.00	3.26	1.40	YES	HROFDY	
C_184	0	0.28581E-04	373045.9	3769512.5	38.0	5.00	3.26	1.40	YES	HROFDY	
C_185	0	0.28581E-04	373053.0	3769512.5	38.0	5.00	3.26	1.40	YES	HROFDY	
C_186	0	0.28581E-04	373011.0	3769517.5	38.0	5.00	3.26	1.40	YES	HROFDY	
C_187	0	0.28581E-04	373018.0	3769517.5	38.0	5.00	3.26	1.40	YES	HROFDY	
C_188	0	0.28581E-04	373025.0	3769517.5	38.0	5.00	3.26	1.40	YES	HROFDY	
C_189	0	0.28581E-04	373032.0	3769517.5	38.0	5.00	3.26	1.40	YES	HROFDY	
C_190	0	0.28581E-04	373039.0	3769517.5	38.0	5.00	3.26	1.40	YES	HROFDY	
C_191	0	0.28581E-04	373045.9	3769517.5	38.0	5.00	3.26	1.40	YES	HROFDY	
C_192	0	0.28581E-04	373053.0	3769517.5	38.0	5.00	3.26	1.40	YES	HROFDY	
C_193	0	0.28581E-04	373011.0	3769522.5	38.0	5.00	3.26	1.40	YES	HROFDY	
C_194	0	0.28581E-04	373018.0	3769522.5	38.0	5.00	3.26	1.40	YES	HROFDY	
C_195	0	0.28581E-04	373025.0	3769522.5	38.0	5.00	3.26	1.40	YES	HROFDY	
C_196	0	0.28581E-04	373032.0	3769522.5	38.0	5.00	3.26	1.40	YES	HROFDY	
C_197	0	0.28581E-04	373039.0	3769522.5	38.0	5.00	3.26	1.40	YES	HROFDY	
C_198	0	0.28581E-04	373045.9	3769522.5	38.0	5.00	3.26	1.40	YES	HROFDY	
C_199	0	0.28581E-04	373053.0	3769522.5	38.0	5.00	3.26	1.40	YES	HROFDY	
C_200	0	0.28581E-04	373052.0	3769427.5	38.0	5.00	3.26	1.40	YES	HROFDY	

*** MODELOPTs: RegDFault CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** VOLUME SOURCE DATA ***

SOURCE ID	PART. CATS.	EMISSION RATE (GRAMS/SEC)	X (METERS)	Y (METERS)	BASE ELEV. (METERS)	RELEASE HEIGHT (METERS)	INIT. SY (METERS)	INIT. SZ (METERS)	URBAN SOURCE	EMISSION RATE SCALAR VARY BY
C_201	0	0.28581E-04	373051.8	3769422.6	38.0	5.00	3.26	1.40	YES	HROFDY
C_202	0	0.28581E-04	373051.6	3769417.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_203	0	0.28581E-04	373051.5	3769412.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_204	0	0.28581E-04	373051.3	3769407.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_205	0	0.28581E-04	373051.3	3769402.3	38.0	5.00	3.26	1.40	YES	HROFDY
C_206	0	0.28581E-04	373051.0	3769397.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_207	0	0.28581E-04	373050.9	3769392.4	38.0	5.00	3.26	1.40	YES	HROFDY
C_208	0	0.28581E-04	373050.6	3769387.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_209	0	0.28581E-04	373050.5	3769382.5	38.0	5.00	3.26	1.40	YES	HROFDY
C_210	0	0.28581E-04	373050.3	3769377.5	38.0	5.00	3.26	1.40	YES	HROFDY

*** MODELOPTs: RegDFault CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** SOURCE IDs DEFINING SOURCE GROUPS ***

SRCGROUP ID	SOURCE IDs
ALL	C_1 , C_2 , C_3 , C_4 , C_5 , C_6 , C_7 , C_8 , C_9 , C_10 , C_11 , C_12 , C_13 , C_14 , C_15 , C_16 , C_17 , C_18 , C_19 , C_20 , C_21 , C_22 , C_23 , C_24 , C_25 , C_26 , C_27 , C_28 , C_29 , C_30 , C_31 , C_32 , C_33 , C_34 , C_35 , C_36 , C_37 , C_38 , C_39 , C_40 , C_41 , C_42 , C_43 , C_44 , C_45 , C_46 , C_47 , C_48 , C_49 , C_50 , C_51 , C_52 , C_53 , C_54 , C_55 , C_56 , C_57 , C_58 , C_59 , C_60 , C_61 , C_62 , C_63 , C_64 , C_65 , C_66 , C_67 , C_68 , C_69 , C_70 , C_71 , C_72 , C_73 , C_74 , C_75 , C_76 , C_77 , C_78 , C_79 , C_80 , C_81 , C_82 , C_83 , C_84 , C_85 , C_86 , C_87 , C_88 , C_89 , C_90 , C_91 , C_92 , C_93 , C_94 , C_95 , C_96 , C_97 , C_98 , C_99 , C_100 , C_101 , C_102 , C_103 , C_104 , C_105 , C_106 , C_107 , C_108 , C_109 , C_110 , C_111 , C_112 , C_113 , C_114 , C_115 , C_116 , C_117 , C_118 , C_119 , C_120 , C_121 , C_122 , C_123 , C_124 , C_125 , C_126 , C_127 , C_128 , C_129 , C_130 , C_131 , C_132 , C_133 , C_134 , C_135 , C_136 , C_137 , C_138 , C_139 , C_140 , C_141 , C_142 , C_143 , C_144 , C_145 , C_146 , C_147 , C_148 , C_149 , C_150 , C_151 , C_152 , C_153 , C_154 , C_155 , C_156 , C_157 , C_158 , C_159 , C_160

*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** SOURCE IDs DEFINING SOURCE GROUPS ***

SRCGROUP ID	SOURCE IDs								
-----	-----	-----	-----	-----	-----	-----	-----	-----	-----
C_161	, C_162	, C_163	, C_164	, C_165	, C_166	, C_167	, C_168	, C_169	, C_170
C_177	, C_178	, C_179	, C_180	, C_181	, C_182	, C_183	, C_184	, C_185	, C_186
C_193	, C_194	, C_195	, C_196	, C_197	, C_198	, C_199	, C_200	, C_201	, C_202
C_209	, C_210	, C_211	, C_212	, C_213	, C_214	, C_215	, C_216	, C_217	, C_218

*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** SOURCE IDs DEFINED AS URBAN SOURCES ***

URBAN ID	URBAN POP	SOURCE IDs								
-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	
C_8	9818605.	C_1	, C_2	, C_3	, C_4	, C_5	, C_6	, C_7	, C_8	
C_9		, C_10	, C_11	, C_12	, C_13	, C_14	, C_15	, C_16	, C_17	
C_17		, C_18	, C_19	, C_20	, C_21	, C_22	, C_23	, C_24	, C_25	
C_25		, C_26	, C_27	, C_28	, C_29	, C_30	, C_31	, C_32	, C_33	
C_33		, C_34	, C_35	, C_36	, C_37	, C_38	, C_39	, C_40	, C_41	
C_41		, C_42	, C_43	, C_44	, C_45	, C_46	, C_47	, C_48	, C_49	
C_49		, C_50	, C_51	, C_52	, C_53	, C_54	, C_55	, C_56	, C_57	
C_57		, C_58	, C_59	, C_60	, C_61	, C_62	, C_63	, C_64	, C_65	
C_65		, C_66	, C_67	, C_68	, C_69	, C_70	, C_71	, C_72	, C_73	
C_73		, C_74	, C_75	, C_76	, C_77	, C_78	, C_79	, C_80	, C_81	
C_81		, C_82	, C_83	, C_84	, C_85	, C_86	, C_87	, C_88	, C_89	
C_89		, C_90	, C_91	, C_92	, C_93	, C_94	, C_95	, C_96	, C_97	
C_97		, C_98	, C_99	, C_100	, C_101	, C_102	, C_103	, C_104	, C_105	
C_105		, C_106	, C_107	, C_108	, C_109	, C_110	, C_111	, C_112	, C_113	
C_113		, C_114	, C_115	, C_116	, C_117	, C_118	, C_119	, C_120	, C_121	
C_121		, C_122	, C_123	, C_124	, C_125	, C_126	, C_127	, C_128	, C_129	
C_129		, C_130	, C_131	, C_132	, C_133	, C_134	, C_135	, C_136	, C_137	
C_137		, C_138	, C_139	, C_140	, C_141	, C_142	, C_143	, C_144	, C_145	

C_145 , C_146 , C_147 , C_148 , C_149 , C_150 , C_151 , C_152 ,
 C_153 , C_154 , C_155 , C_156 , C_157 , C_158 , C_159 , C_160 ,

*** AERMOD - VERSION 22112 *** *** 1050 La Cienega Boulevard Project / School Exposure Scenario *** 07/18/23
 *** AERMET - VERSION 16216 *** *** Construction / Particulates (DPM) *** 13:16:43
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*** MODELOPTs: RegDFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** SOURCE IDs DEFINED AS URBAN SOURCES ***

URBAN ID	URBAN POP	SOURCE IDs																																																	
-----	-----	-----																																																	
C_161		, C_162	, C_163	, C_164	, C_165	, C_166	, C_167	, C_168	, C_169	, C_170	, C_171	, C_172	, C_173	, C_174	, C_175	, C_176	, C_177	, C_178	, C_179	, C_180	, C_181	, C_182	, C_183	, C_184	, C_185	, C_186	, C_187	, C_188	, C_189	, C_190	, C_191	, C_192	, C_193	, C_194	, C_195	, C_196	, C_197	, C_198	, C_199	, C_200	, C_201	, C_202	, C_203	, C_204	, C_205	, C_206	, C_207	, C_208	, C_209	, C_210	

*** AERMOD - VERSION 22112 *** *** 1050 La Cienega Boulevard Project / School Exposure Scenario *** 07/18/23
 *** AERMET - VERSION 16216 *** *** Construction / Particulates (DPM) *** 13:16:43
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*** MODELOPTs: RegDFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR		
-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----		
SOURCE ID = C_1 ; SOURCE TYPE = VOLUME :													
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00		
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01		
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00	19	.00000E+00
20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00				
SOURCE ID = C_2 ; SOURCE TYPE = VOLUME :													
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00	7	.00000E+00
8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01	13	.42000E+01	14	.42000E+01
15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00	19	.00000E+00	20	.00000E+00	21	.00000E+00
22	.00000E+00	23	.00000E+00	24	.00000E+00								
SOURCE ID = C_3 ; SOURCE TYPE = VOLUME :													
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00	7	.00000E+00
8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01	13	.42000E+01	14	.42000E+01
15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00	19	.00000E+00	20	.00000E+00	21	.00000E+00
22	.00000E+00	23	.00000E+00	24	.00000E+00								
SOURCE ID = C_4 ; SOURCE TYPE = VOLUME :													
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00	7	.00000E+00
8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01	13	.42000E+01	14	.42000E+01
15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00	19	.00000E+00	20	.00000E+00	21	.00000E+00
22	.00000E+00	23	.00000E+00	24	.00000E+00								
SOURCE ID = C_5 ; SOURCE TYPE = VOLUME :													
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00	7	.00000E+00
8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01	13	.42000E+01	14	.42000E+01
15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00	19	.00000E+00	20	.00000E+00	21	.00000E+00
22	.00000E+00	23	.00000E+00	24	.00000E+00								

*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
SOURCE ID = C_6 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_7 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_8 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_9 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_10 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
SOURCE ID = C_11 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_12 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_13 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00

19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_14 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_15 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

*** AERMOD - VERSION 22112 *** 1050 La Cienega Boulevard Project / School Exposure Scenario *** 07/18/23
*** AERMET - VERSION 16216 *** Construction / Particulates (DPM) *** 13:16:43
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*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR

SOURCE ID = C_16 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_17 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_18 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_19 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_20 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

*** AERMOD - VERSION 22112 *** 1050 La Cienega Boulevard Project / School Exposure Scenario *** 07/18/23
*** AERMET - VERSION 16216 *** Construction / Particulates (DPM) *** 13:16:43
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*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR

SOURCE ID = C_21 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01

13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_22 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_23 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_24 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_25 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

*** AERMOD - VERSION 22112 *** 1050 La Cienega Boulevard Project / School Exposure Scenario *** 07/18/23
*** AERMET - VERSION 16216 *** Construction / Particulates (DPM) *** 13:16:43
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*** MODELOPTs: RegDFault CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
SOURCE ID = C_26 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00
SOURCE ID = C_27 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00
SOURCE ID = C_28 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00
SOURCE ID = C_29 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00
SOURCE ID = C_30 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

*** MODELOPTs: RegDFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
SOURCE ID = C_31 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_32 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_33 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_34 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_35 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

*** MODELOPTs: RegDFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
SOURCE ID = C_36 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_37 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_38 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_39 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_40 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

*** AERMOD - VERSION 22112 *** *** 1050 La Cienega Boulevard Project / School Exposure Scenario *** 07/18/23
 *** AERMET - VERSION 16216 *** *** Construction / Particulates (DPM) *** 13:16:43
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*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
------	--------	------	--------	------	--------	------	--------	------	--------	------	--------

SOURCE ID = C_41 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_42 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_43 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_44 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_45 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

*** AERMOD - VERSION 22112 *** *** 1050 La Cienega Boulevard Project / School Exposure Scenario *** 07/18/23
 *** AERMET - VERSION 16216 *** *** Construction / Particulates (DPM) *** 13:16:43
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*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
------	--------	------	--------	------	--------	------	--------	------	--------	------	--------

SOURCE ID = C_46 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_47 ; SOURCE TYPE = VOLUME :
 1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
 7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
 13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_48 ; SOURCE TYPE = VOLUME :
 1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
 7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
 13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_49 ; SOURCE TYPE = VOLUME :
 1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
 7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
 13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_50 ; SOURCE TYPE = VOLUME :
 1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
 7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
 13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

*** AERMOD - VERSION 22112 *** *** 1050 La Cienega Boulevard Project / School Exposure Scenario *** 07/18/23
 *** AERMET - VERSION 16216 *** *** Construction / Particulates (DPM) *** 13:16:43
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*** MODELOPTs: RegDFault CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR

SOURCE ID = C_51 ; SOURCE TYPE = VOLUME :
 1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
 7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
 13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_52 ; SOURCE TYPE = VOLUME :
 1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
 7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
 13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_53 ; SOURCE TYPE = VOLUME :
 1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
 7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
 13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_54 ; SOURCE TYPE = VOLUME :
 1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
 7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
 13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_55 ; SOURCE TYPE = VOLUME :
 1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
 7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
 13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
SOURCE ID = C_56 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_57 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_58 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_59 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_60 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
SOURCE ID = C_61 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_62 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_63 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00

19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_64 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_65 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

*** AERMOD - VERSION 22112 *** *** 1050 La Cienega Boulevard Project / School Exposure Scenario *** 07/18/23
*** AERMET - VERSION 16216 *** *** Construction / Particulates (DPM) *** 13:16:43
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*** MODELOPTs: RegDFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR

SOURCE ID = C_66 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_67 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_68 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_69 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_70 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

*** AERMOD - VERSION 22112 *** *** 1050 La Cienega Boulevard Project / School Exposure Scenario *** 07/18/23
*** AERMET - VERSION 16216 *** *** Construction / Particulates (DPM) *** 13:16:43
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*** MODELOPTs: RegDFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR

SOURCE ID = C_71 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00

7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
 13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_72 ; SOURCE TYPE = VOLUME :
 1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
 7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
 13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_73 ; SOURCE TYPE = VOLUME :
 1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
 7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
 13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_74 ; SOURCE TYPE = VOLUME :
 1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
 7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
 13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_75 ; SOURCE TYPE = VOLUME :
 1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
 7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
 13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

*** AERMOD - VERSION 22112 *** *** 1050 La Cienega Boulevard Project / School Exposure Scenario *** 07/18/23
 *** AERMET - VERSION 16216 *** *** Construction / Particulates (DPM) *** 13:16:43
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*** MODELOPTs: RegDFault CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HR	SCALAR	HR	SCALAR	HR	SCALAR	HR	SCALAR	HR	SCALAR	HR	SCALAR
SOURCE ID = C_76 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00
SOURCE ID = C_77 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00
SOURCE ID = C_78 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00
SOURCE ID = C_79 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00
SOURCE ID = C_80 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
SOURCE ID = C_81 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_82 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_83 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_84 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_85 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
SOURCE ID = C_86 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_87 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_88 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_89 ; SOURCE TYPE = VOLUME :
 1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
 7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
 13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_90 ; SOURCE TYPE = VOLUME :
 1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
 7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
 13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

*** AERMOD - VERSION 22112 *** 1050 La Cienega Boulevard Project / School Exposure Scenario *** 07/18/23
 *** AERMET - VERSION 16216 *** Construction / Particulates (DPM) *** 13:16:43
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*** MODELOPTs: RegDFault CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
------	--------	------	--------	------	--------	------	--------	------	--------	------	--------

SOURCE ID = C_91 ; SOURCE TYPE = VOLUME :
 1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
 7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
 13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_92 ; SOURCE TYPE = VOLUME :
 1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
 7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
 13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_93 ; SOURCE TYPE = VOLUME :
 1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
 7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
 13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_94 ; SOURCE TYPE = VOLUME :
 1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
 7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
 13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_95 ; SOURCE TYPE = VOLUME :
 1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
 7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
 13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

*** AERMOD - VERSION 22112 *** 1050 La Cienega Boulevard Project / School Exposure Scenario *** 07/18/23
 *** AERMET - VERSION 16216 *** Construction / Particulates (DPM) *** 13:16:43
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*** MODELOPTs: RegDFault CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
------	--------	------	--------	------	--------	------	--------	------	--------	------	--------

SOURCE ID = C_96 ; SOURCE TYPE = VOLUME :
 1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
 7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
 13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

*** MODELOPTs: RegDFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
SOURCE ID = C_106 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_107 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_108 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_109 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_110 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

*** MODELOPTs: RegDFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
SOURCE ID = C_111 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_112 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_113 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_114 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_115 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

*** AERMOD - VERSION 22112 *** 1050 La Cienega Boulevard Project / School Exposure Scenario 07/18/23
 *** AERMET - VERSION 16216 *** Construction / Particulates (DPM) 13:16:43
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*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
------	--------	------	--------	------	--------	------	--------	------	--------	------	--------

SOURCE ID = C_116 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_117 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_118 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_119 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_120 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

*** AERMOD - VERSION 22112 *** 1050 La Cienega Boulevard Project / School Exposure Scenario 07/18/23
 *** AERMET - VERSION 16216 *** Construction / Particulates (DPM) 13:16:43
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*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
------	--------	------	--------	------	--------	------	--------	------	--------	------	--------

SOURCE ID = C_121 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_122 ; SOURCE TYPE = VOLUME :
 1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
 7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
 13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_123 ; SOURCE TYPE = VOLUME :
 1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
 7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
 13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_124 ; SOURCE TYPE = VOLUME :
 1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
 7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
 13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_125 ; SOURCE TYPE = VOLUME :
 1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
 7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
 13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

*** AERMOD - VERSION 22112 *** *** 1050 La Cienega Boulevard Project / School Exposure Scenario *** 07/18/23
 *** AERMET - VERSION 16216 *** *** Construction / Particulates (DPM) *** 13:16:43
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*** MODELOPTs: RegDFault CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

 HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR

SOURCE ID = C_126 ; SOURCE TYPE = VOLUME :
 1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
 7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
 13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_127 ; SOURCE TYPE = VOLUME :
 1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
 7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
 13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_128 ; SOURCE TYPE = VOLUME :
 1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
 7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
 13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_129 ; SOURCE TYPE = VOLUME :
 1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
 7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
 13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_130 ; SOURCE TYPE = VOLUME :
 1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
 7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
 13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
 19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
SOURCE ID = C_131 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00
SOURCE ID = C_132 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00
SOURCE ID = C_133 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00
SOURCE ID = C_134 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00
SOURCE ID = C_135 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
SOURCE ID = C_136 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00
SOURCE ID = C_137 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00
SOURCE ID = C_138 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_139 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_140 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

*** AERMOD - VERSION 22112 *** ** 1050 La Cienega Boulevard Project / School Exposure Scenario *** 07/18/23
*** AERMET - VERSION 16216 *** ** Construction / Particulates (DPM) *** 13:16:43
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*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOURL	SCALAR	HOURL	SCALAR	HOURL	SCALAR	HOURL	SCALAR	HOURL	SCALAR	HOURL	SCALAR

SOURCE ID = C_141 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_142 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_143 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_144 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_145 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

*** AERMOD - VERSION 22112 *** ** 1050 La Cienega Boulevard Project / School Exposure Scenario *** 07/18/23
*** AERMET - VERSION 16216 *** ** Construction / Particulates (DPM) *** 13:16:43
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*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOURL	SCALAR	HOURL	SCALAR	HOURL	SCALAR	HOURL	SCALAR	HOURL	SCALAR	HOURL	SCALAR

SOURCE ID = C_146 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_147 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_148 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_149 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_150 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

*** AERMOD - VERSION 22112 *** ** 1050 La Cienega Boulevard Project / School Exposure Scenario *** 07/18/23
*** AERMET - VERSION 16216 *** ** Construction / Particulates (DPM) *** 13:16:43
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*** MODELOPTs: RegDFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR

SOURCE ID = C_151 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_152 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_153 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_154 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_155 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
SOURCE ID = C_156 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_157 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_158 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_159 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_160 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
SOURCE ID = C_161 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_162 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_163 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_164 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_165 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

*** AERMOD - VERSION 22112 *** 1050 La Cienega Boulevard Project / School Exposure Scenario *** 07/18/23
*** AERMET - VERSION 16216 *** Construction / Particulates (DPM) *** 13:16:43
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*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR

SOURCE ID = C_166 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_167 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_168 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_169 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_170 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

*** AERMOD - VERSION 22112 *** 1050 La Cienega Boulevard Project / School Exposure Scenario *** 07/18/23
*** AERMET - VERSION 16216 *** Construction / Particulates (DPM) *** 13:16:43
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*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR

SOURCE ID = C_171 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_172 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_173 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_174 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_175 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

*** AERMOD - VERSION 22112 *** *** 1050 La Cienega Boulevard Project / School Exposure Scenario *** 07/18/23
 *** AERMET - VERSION 16216 *** *** Construction / Particulates (DPM) *** 13:16:43
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*** MODELOPTs: RegDFault CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HR	SCALAR	HR	SCALAR	HR	SCALAR	HR	SCALAR	HR	SCALAR	HR	SCALAR

SOURCE ID = C_176 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_177 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_178 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_179 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_180 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
------	--------	------	--------	------	--------	------	--------	------	--------	------	--------

SOURCE ID = C_181 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_182 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_183 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_184 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_185 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
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SOURCE ID = C_186 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_187 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_188 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_189 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_190 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

*** AERMOD - VERSION 22112 *** 1050 La Cienega Boulevard Project / School Exposure Scenario *** 07/18/23
 *** AERMET - VERSION 16216 *** Construction / Particulates (DPM) *** 13:16:43
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*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
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SOURCE ID = C_191 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_192 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_193 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_194 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_195 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

*** AERMOD - VERSION 22112 *** 1050 La Cienega Boulevard Project / School Exposure Scenario *** 07/18/23
 *** AERMET - VERSION 16216 *** Construction / Particulates (DPM) *** 13:16:43
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*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
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SOURCE ID = C_196 ; SOURCE TYPE = VOLUME :

1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_197 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_198 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_199 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_200 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

*** AERMOD - VERSION 22112 *** ** 1050 La Cienega Boulevard Project / School Exposure Scenario *** 07/18/23
*** AERMET - VERSION 16216 *** ** Construction / Particulates (DPM) *** 13:16:43
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*** MODELOPTs: RegDFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR

SOURCE ID = C_201 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_202 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_203 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_204 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

SOURCE ID = C_205 ; SOURCE TYPE = VOLUME :
1 .00000E+00 2 .00000E+00 3 .00000E+00 4 .00000E+00 5 .00000E+00 6 .00000E+00
7 .00000E+00 8 .00000E+00 9 .42000E+01 10 .42000E+01 11 .42000E+01 12 .42000E+01
13 .42000E+01 14 .42000E+01 15 .42000E+01 16 .42000E+01 17 .00000E+00 18 .00000E+00
19 .00000E+00 20 .00000E+00 21 .00000E+00 22 .00000E+00 23 .00000E+00 24 .00000E+00

*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

* SOURCE EMISSION RATE SCALARS WHICH VARY FOR EACH HOUR OF THE DAY *

HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR	HOUR	SCALAR
SOURCE ID = C_206 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_207 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_208 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_209 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

SOURCE ID = C_210 ; SOURCE TYPE = VOLUME :											
1	.00000E+00	2	.00000E+00	3	.00000E+00	4	.00000E+00	5	.00000E+00	6	.00000E+00
7	.00000E+00	8	.00000E+00	9	.42000E+01	10	.42000E+01	11	.42000E+01	12	.42000E+01
13	.42000E+01	14	.42000E+01	15	.42000E+01	16	.42000E+01	17	.00000E+00	18	.00000E+00
19	.00000E+00	20	.00000E+00	21	.00000E+00	22	.00000E+00	23	.00000E+00	24	.00000E+00

*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** DISCRETE CARTESIAN RECEPTORS ***
(X-COORD, Y-COORD, ZELEV, ZHILL, ZFLAG)
(METERS)

(372900.0, 3769526.0, 39.0, 39.0, 2.0);	(372908.8, 3769526.0, 39.0, 39.0, 2.0);
(372917.5, 3769526.0, 39.0, 39.0, 2.0);	(372926.3, 3769526.0, 39.0, 39.0, 2.0);
(372935.0, 3769526.0, 39.0, 39.0, 2.0);	(372935.0, 3769516.9, 39.0, 39.0, 2.0);
(372935.0, 3769507.8, 39.0, 39.0, 2.0);	(372935.0, 3769498.7, 39.0, 39.0, 2.0);
(372935.0, 3769489.6, 39.0, 39.0, 2.0);	(372935.0, 3769480.4, 39.0, 39.0, 2.0);
(372935.0, 3769471.3, 39.0, 39.0, 2.0);	(372935.0, 3769462.2, 39.0, 39.0, 2.0);
(372935.0, 3769453.1, 39.0, 39.0, 2.0);	(372935.0, 3769444.0, 39.0, 39.0, 2.0);
(372943.4, 3769444.0, 39.0, 39.0, 2.0);	(372951.8, 3769444.0, 39.0, 39.0, 2.0);
(372960.2, 3769444.0, 39.0, 39.0, 2.0);	(372968.6, 3769444.0, 39.0, 39.0, 2.0);
(372977.0, 3769444.0, 39.0, 39.0, 2.0);	(372977.0, 3769435.2, 39.0, 39.0, 2.0);
(372977.0, 3769426.4, 39.0, 39.0, 2.0);	(372977.0, 3769417.6, 39.0, 39.0, 2.0);
(372977.0, 3769408.8, 39.0, 39.0, 2.0);	(372977.0, 3769400.0, 39.0, 39.0, 2.0);
(372968.6, 3769400.0, 39.0, 39.0, 2.0);	(372960.2, 3769400.0, 39.0, 39.0, 2.0);
(372951.8, 3769400.0, 39.0, 39.0, 2.0);	(372943.4, 3769400.0, 39.0, 39.0, 2.0);
(372935.0, 3769400.0, 39.0, 39.0, 2.0);	(372935.0, 3769408.8, 39.0, 39.0, 2.0);
(372935.0, 3769417.6, 39.0, 39.0, 2.0);	(372935.0, 3769426.4, 39.0, 39.0, 2.0);
(372935.0, 3769435.2, 39.0, 39.0, 2.0);	(372935.0, 3769444.0, 39.0, 39.0, 2.0);
(372926.3, 3769444.0, 39.0, 39.0, 2.0);	(372917.5, 3769444.0, 39.0, 39.0, 2.0);
(372908.8, 3769444.0, 39.0, 39.0, 2.0);	(372900.0, 3769444.0, 39.0, 39.0, 2.0);
(372900.0, 3769453.1, 39.0, 39.0, 2.0);	(372900.0, 3769462.2, 39.0, 39.0, 2.0);
(372900.0, 3769471.3, 39.0, 39.0, 2.0);	(372900.0, 3769480.4, 39.0, 39.0, 2.0);

12	01	01	1	10	102.6	0.234	0.691	0.006	117.	271.	-11.3	0.17	2.20	0.23	1.79	204.	10.1	289.2	2.0
12	01	01	1	11	154.6	0.178	1.118	0.005	327.	181.	-3.3	0.17	2.20	0.20	1.11	119.	10.1	296.4	2.0
12	01	01	1	12	182.0	0.295	1.459	0.005	618.	385.	-12.8	0.17	2.20	0.19	2.30	76.	10.1	300.9	2.0
12	01	01	1	13	175.0	0.355	1.686	0.005	991.	507.	-23.0	0.17	2.20	0.19	2.98	179.	10.1	293.8	2.0
12	01	01	1	14	148.1	0.374	1.737	0.005	1282.	549.	-31.9	0.17	2.20	0.20	3.25	211.	10.1	292.0	2.0
12	01	01	1	15	98.0	0.291	1.572	0.005	1436.	380.	-22.7	0.17	2.20	0.23	2.44	231.	10.1	290.9	2.0
12	01	01	1	16	28.2	0.303	1.044	0.005	1460.	400.	-89.0	0.17	2.20	0.32	2.85	217.	10.1	289.2	2.0
12	01	01	1	17	-22.4	0.259	-9.000	-9.000	-999.	317.	73.7	0.17	2.20	0.58	2.73	226.	10.1	287.0	2.0
12	01	01	1	18	-8.7	0.131	-9.000	-9.000	-999.	124.	23.3	0.17	2.20	1.00	1.45	230.	10.1	286.4	2.0
12	01	01	1	19	-13.2	0.163	-9.000	-9.000	-999.	157.	29.4	0.17	2.20	1.00	1.77	225.	10.1	285.9	2.0
12	01	01	1	20	-5.7	0.106	-9.000	-9.000	-999.	83.	18.6	0.17	2.20	1.00	1.18	182.	10.1	284.9	2.0
12	01	01	1	21	-999.0	-9.000	-9.000	-9.000	-999.	-999.	-99999.0	0.17	2.20	1.00	0.00	0.	10.1	284.2	2.0
12	01	01	1	22	-7.3	0.119	-9.000	-9.000	-999.	99.	21.1	0.17	2.20	1.00	1.33	202.	10.1	285.4	2.0
12	01	01	1	23	-6.0	0.108	-9.000	-9.000	-999.	86.	19.1	0.17	2.20	1.00	1.21	251.	10.1	284.9	2.0
12	01	01	1	24	-5.4	0.102	-9.000	-9.000	-999.	78.	18.0	0.17	2.20	1.00	1.14	224.	10.1	284.2	2.0

First hour of profile data

YR	MO	DY	HR	HEIGHT	F	WDIR	WSPD	AMB_TMP	sigmaA	sigmaW	sigmaV
12	01	01	01	10.1	1	131.	1.26	283.2	99.0	-99.00	-99.00

F indicates top of profile (=1) or below (=0)

*** AERMOD - VERSION 22112 *** *** 1050 La Cienega Boulevard Project / School Exposure Scenario *** 07/18/23
 *** AERMET - VERSION 16216 *** *** Construction / Particulates (DPM) *** 13:16:43
 PAGE 57

*** MODELOPTs: RegDFAULT CONC ELEV FLGPOL NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** THE ANNUAL AVERAGE CONCENTRATION										VALUES AVERAGED OVER										5 YEARS FOR SOURCE GROUP: ALL										***
INCLUDING SOURCE(S):										C_1			C_2			C_3			C_4			C_5								
C_6		C_7		C_8		C_9		C_10		C_11		C_12		C_13																
C_14		C_15		C_16		C_17		C_18		C_19		C_20		C_21																
C_22		C_23		C_24		C_25		C_26		C_27		C_28																		

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)	Y-COORD (M)	CONC
372900.00	3769526.00	0.04582	372908.80	3769526.00	0.05168
372917.50	3769526.00	0.05859	372926.30	3769526.00	0.06702
372935.00	3769526.00	0.07718	372935.00	3769516.90	0.08361
372935.00	3769507.80	0.08974	372935.00	3769498.70	0.09538
372935.00	3769489.60	0.10034	372935.00	3769480.40	0.10452
372935.00	3769471.30	0.10774	372935.00	3769462.20	0.10998
372935.00	3769453.10	0.11121	372935.00	3769444.00	0.11141
372943.40	3769444.00	0.13211	372951.80	3769444.00	0.15853
372960.20	3769444.00	0.19278	372968.60	3769444.00	0.23797
372977.00	3769444.00	0.29872	372977.00	3769435.20	0.29580
372977.00	3769426.40	0.29007	372977.00	3769417.60	0.28128
372977.00	3769408.80	0.26909	372977.00	3769400.00	0.25315
372968.60	3769400.00	0.20249	372960.20	3769400.00	0.16515
372951.80	3769400.00	0.13698	372943.40	3769400.00	0.11525
372935.00	3769400.00	0.09816	372935.00	3769408.80	0.10258
372935.00	3769417.60	0.10617	372935.00	3769426.40	0.10886
372935.00	3769435.20	0.11061	372935.00	3769444.00	0.11141
372926.30	3769444.00	0.09442	372917.50	3769444.00	0.08070
372908.80	3769444.00	0.06972	372900.00	3769444.00	0.06062
372900.00	3769453.10	0.06045	372900.00	3769462.20	0.05983
372900.00	3769471.30	0.05880	372900.00	3769480.40	0.05737
372900.00	3769489.60	0.05556	372900.00	3769498.70	0.05345
372900.00	3769507.80	0.05109	372900.00	3769516.90	0.04852
372908.80	3769516.90	0.05499	372908.80	3769507.80	0.05813
372908.80	3769498.70	0.06103	372908.80	3769489.60	0.06281
372908.80	3769480.40	0.06582	372908.80	3769471.40	0.06754
372908.80	3769462.20	0.06880	372908.80	3769453.10	0.06953
372917.50	3769516.90	0.06267	372917.50	3769507.80	0.06655
372917.50	3769498.70	0.07012	372917.50	3769489.60	0.07330
372917.50	3769480.40	0.07601	372917.50	3769471.10	0.07817
372917.50	3769462.20	0.07963	372917.50	3769453.10	0.08050
372926.30	3769516.90	0.07211	372926.30	3769507.80	0.07696
372926.30	3769498.70	0.08143	372926.40	3769489.60	0.08554
372926.30	3769480.40	0.08875	372926.30	3769471.10	0.09140
372926.30	3769462.20	0.09319	372926.30	3769453.10	0.09422

372951.80	3769435.20	0.15717	372943.00	3769426.40	0.12778
372943.00	3769417.60	0.12440	372943.00	3769408.80	0.11990
372943.00	3769435.20	0.12998	372951.80	3769426.40	0.15433
372951.80	3769417.60	0.15000	372951.80	3769408.80	0.14420
372960.20	3769435.20	0.19102	372960.20	3769426.40	0.18741

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*** AERMOD - VERSION 22112 ***   *** 1050 La Cienega Boulevard Project / School Exposure Scenario   ***   07/18/23
*** AERMET - VERSION 16216 ***   *** Construction / Particulates (DPM)   ***   13:16:43
*** MODELPTs:   RegDFAULT  CONC  ELEV  FLGPOL  NODRYDPLT  NOWETDPLT  URBAN  ADJ_U*   ***   PAGE 58

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*** THE ANNUAL AVERAGE CONCENTRATION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S):  C_1      , C_2      , C_3      , C_4      , C_5      ,
C_6      , C_7      , C_8      , C_9      , C_10     , C_11     , C_12     , C_13     ,
C_14     , C_15     , C_16     , C_17     , C_18     , C_19     , C_20     , C_21     ,
C_22     , C_23     , C_24     , C_25     , C_26     , C_27     , C_28     , . . .

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*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)	Y-COORD (M)	CONC
372960.20	3769417.60	0.18192	372960.20	3769408.80	0.17449
372968.60	3769435.20	0.23570	372968.60	3769426.40	0.23114
372968.60	3769417.60	0.22418	372968.60	3769408.80	0.21466

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*** AERMOD - VERSION 22112 ***   *** 1050 La Cienega Boulevard Project / School Exposure Scenario   ***   07/18/23
*** AERMET - VERSION 16216 ***   *** Construction / Particulates (DPM)   ***   13:16:43
*** MODELPTs:   RegDFAULT  CONC  ELEV  FLGPOL  NODRYDPLT  NOWETDPLT  URBAN  ADJ_U*   ***   PAGE 59

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*** THE SUMMARY OF MAXIMUM ANNUAL RESULTS AVERAGED OVER 5 YEARS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

GROUP ID	AVERAGE CONC	RECEPTOR (XR, YR, ZELEV, ZHILL, ZFLAG)	OF TYPE	NETWORK GRID-ID
ALL	1ST HIGHEST VALUE IS 0.29872 AT (372977.00, 3769444.00,	39.00, 39.00, 2.00)	DC	
	2ND HIGHEST VALUE IS 0.29580 AT (372977.00, 3769435.20,	39.00, 39.00, 2.00)	DC	
	3RD HIGHEST VALUE IS 0.29007 AT (372977.00, 3769426.40,	39.00, 39.00, 2.00)	DC	
	4TH HIGHEST VALUE IS 0.28128 AT (372977.00, 3769417.60,	39.00, 39.00, 2.00)	DC	
	5TH HIGHEST VALUE IS 0.26909 AT (372977.00, 3769408.80,	39.00, 39.00, 2.00)	DC	
	6TH HIGHEST VALUE IS 0.25315 AT (372977.00, 3769400.00,	39.00, 39.00, 2.00)	DC	
	7TH HIGHEST VALUE IS 0.23797 AT (372968.60, 3769444.00,	39.00, 39.00, 2.00)	DC	
	8TH HIGHEST VALUE IS 0.23570 AT (372968.60, 3769435.20,	39.00, 39.00, 2.00)	DC	
	9TH HIGHEST VALUE IS 0.23114 AT (372968.60, 3769426.40,	39.00, 39.00, 2.00)	DC	
	10TH HIGHEST VALUE IS 0.22418 AT (372968.60, 3769417.60,	39.00, 39.00, 2.00)	DC	

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*** RECEPTOR TYPES:  GC = GRIDCART
                       GP = GRIDPOLR
                       DC = DISCCART
                       DP = DISCPOLR

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*** AERMOD - VERSION 22112 ***   *** 1050 La Cienega Boulevard Project / School Exposure Scenario   ***   07/18/23
*** AERMET - VERSION 16216 ***   *** Construction / Particulates (DPM)   ***   13:16:43
*** MODELPTs:   RegDFAULT  CONC  ELEV  FLGPOL  NODRYDPLT  NOWETDPLT  URBAN  ADJ_U*   ***   PAGE 60

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*** Message Summary : AERMOD Model Execution ***

----- Summary of Total Messages -----

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A Total of      0 Fatal Error Message(s)
A Total of      2 Warning Message(s)
A Total of     799 Informational Message(s)

A Total of     43848 Hours Were Processed

A Total of      455 Calm Hours Identified

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A Total of 344 Missing Hours Identified (0.78 Percent)

***** FATAL ERROR MESSAGES *****
*** NONE ***

***** WARNING MESSAGES *****

ME W186	749	MEOPEN: THRESH_1MIN 1-min ASOS wind speed threshold used	0.50
ME W187	749	MEOPEN: ADJ_U* Option for Stable Low Winds used in AERMET	

*** AERMOD Finishes Successfully ***

ATTACHMENT E

List of References

1. Air Quality Dynamics, 2022. *1050 La Cienega Boulevard Project – Construction Health Risk Assessment*.
2. California Air Pollution Control Officers Association (CAPCOA), 2023. California Emissions Estimator Model (CalEEMod). Website: <https://caleemod.com>.
3. California Air Resources Board, 2023. *Consolidated Table of OEHHA/ARB Approved Risk Assessment Health Values*.
4. California Code of Regulations, Title 22, Section 12703.
5. California Environmental Protection Agency, Office of Environmental Health Hazard Assessment, 2015. *The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*.
6. City of Los Angeles, Department of City Planning, 2022. *Sustainable Communities Environmental Assessment (SCEA) - 1050 La Cienega Boulevard Project, Case Number: ENV-2022-2280-SCEA*.
7. NTEC, 2023. CalEEMod version 2022.1.1.14 output file.
8. SBC, 2022. 1050 La Cienega Boulevard – TOC Referral Set.
9. South Coast Air Quality Management District (SCAQMD), 2023. *Air Quality Significance Thresholds*.
10. South Coast Air Quality Management District (SCAQMD), *Meteorological Data Set for Santa Monica Airport*.
11. United States Environmental Protection Agency, 2016. *User's Guide for the AMS/EPA Regulatory Model - AERMOD*. EPA-454/B-16-011.
12. United States Environmental Protection Agency, 2016. *AERMOD Implementation Guide*. EPA-454/B-16-013.
13. United States Environmental Protection Agency, 2017. *Guideline on Air Quality Models (Final Rule)*. 40 CFR Part 51.

MEMORANDUM

Date: June 7, 2023

To: Stacie Henderson
CAJA Environmental Services, LLC
9410 Topanga Canyon Blvd., Suite 101
Chatsworth, CA 91311

From: Jenna Snow

Re: 1050 La Cienega Boulevard, Los Angeles, CA
Revised Tower plan

In April 2022, I prepared a Cultural Resources Technical Report (Technical Report) that evaluated potential direct and indirect impacts of a proposed residential development at 1050 La Cienega Boulevard in Los Angeles on historical resources in support of a Sustainable Communities Environmental Assessment (SCEA). The proposed project described in the Technical Report included construction of a 28-story multi-family residential building with one level of below grade parking and ground floor retail along La Cienega Boulevard. While there are no historical resources located at the project site, it is located adjacent to the west of a locally designated historic district, South Carthay Historic Preservation Overlay Zone (HPOZ), as well as adjacent to the larger Carthay Neighborhoods Historic District, which was listed in the California Register of Historical Resources (California Register) in January 2022 and listed in the National Register of Historic Places (National Register) in March 2022. The Technical Report concluded that while the proposed project has potential to cause direct impacts to adjacent garages within the historic districts, it is anticipated that these impacts would be less than significant if precautions are taken during planning, excavation, and construction. Furthermore, the proposed project will not cause material impairment of the historic districts' significant character-defining features and will thus not cause an indirect impact.

I understand the proposed project was slightly redesigned in May 2023. The earlier project involved construction of a three-story podium that encompassed the majority of the subject properties with a 25-story tower above, for a total of a 28-story building. The podium was to sit 15 to 20-feet from the eastern property line. The new building had a contemporary design with the podium screened on the north and west elevations by a series of plaster parabolic arches that varied in height and width. The arched screen was to sit proud of aluminum storefronts along the west elevation facing La Cienega Boulevard. The 25-story tower was to rise at the northwest corner of the podium. It was not proposed as a simple rectangle, rather, complexity was to be achieved through ragged edges and acute angles. The edges were to be smoothed out at the roof level and the plan of the roof was to resemble a flower petal.

In the redesigned project, a tower continues to be proposed above a podium, although the new design proposes a two-story podium. In contrast to the earlier design, the proposed tower will be 22-stories high, for a total of a 24-story building that has a total height of 270-feet to the top of the mechanical enclosure, 64-feet shorter than the previously proposed 334-feet. The redesigned project will be pulled further away from the eastern property line, ranging from 28 to 33-feet, with trees planted between the podium and property line. The podium continues to be proposed to be screened on the north and west elevations by a series of parabolic arches that vary in height and

width. However, while the tower was previously proposed to sit at the northwest corner of the site, it has shifted to rise from the southwest corner of the site. Finally, while the design of the tower previously resembled a flower petal in plan at the roof, the redesigned tower will have a simple rectangular plan with stacks of balconies located at regular intervals.

The redesign project consisting of a shorter tower, simplified plan, further distance from the eastern property line, and shifted location of the tower, does not pose any new direct or indirect impacts to the adjacent South Carthay HPOZ or the larger Carthay Neighborhoods Historic District. Like the proposed project described in the Technical Report, the redesign project will not alter the immediate surroundings such that the significance of either South Carthay HPOZ or the Carthay Neighborhoods Historic District would be materially impaired. The redesigned project will not destroy the essential character-defining features of the historic districts and integrity of both South Carthay HPOZ and the Carthay Neighborhoods Historic District will remain intact. Although the redesigned project, like the proposed project considered in the Technical Report, will introduce a new building visible throughout both South Carthay HPOZ and the Carthay Neighborhoods Historic District, the setting of these historic districts would still be retained. None of the identified character-defining features of the setting, including the street pattern, set-backs, mature street trees, arrangement of single-family and multi-family residences, and period revival architectural styles would be destroyed. Both South Carthay HPOZ and the Carthay Neighborhoods Historic District would remain eligible for designation. Therefore, like the previously proposed project, the redesigned project would not pose a significant indirect impact.

Energy and Fuel Calculations
1050 La Cienega

Summary Page (Revised Project)

Summary of Energy Use during Construction	
Electricity	
Water Consumption	4,569 kWh
Temporary Power (lighting, tools)	80,942 kWh
Total	85,511 kWh
Gasoline	
On Road (Worker)	792,294 gallons
Off Road	0
Total	792,294 gallons
Diesel	
On Road (Vender)	79,050 gallons
On Road (Haul)	56,950 gallons
Off Road	36,967 gallons
Total	172,967 gallons
Total Transportation	965,261 gallons

Summary of Energy Use during Operation	
Building	1,642,281 kWh/year
Water	490,150 kWh/year
Electricity Total	2,132,431 kWh
Natural Gas	
	474,455 cf/year
Gasoline	
	169,300 gallons
Diesel	
	30,098 gallons
Total Transportation	199,398 gallons

Summary Page (SCEA Project)

Summary of Energy Use during Construction	
Electricity	
Water Consumption	4,569 kWh
Temporary Power (lighting, tools)	80,942 kWh
Total	85,511 kWh
Gasoline	
On Road (Worker)	792,294 gallons
Off Road	0
Total	792,294 gallons
Diesel	
On Road (Vender)	79,050 gallons
On Road (Haul)	69,900 gallons
Off Road	36,967 gallons
Total	185,917 gallons
Total Transportation	978,211 gallons

Summary of Energy Use during Operation	
Building	1,836,936 kWh/year
Water	508,382 kWh/year
Electricity Total	2,345,318 kWh
Natural Gas	
	4,142,472 cf/year
Gasoline	
	169,300 gallons
Diesel	
	30,098 gallons
Total Transportation	199,398 gallons

Construction Page

Calculation of Gas Usage During Construction (On-road workers)						
Phase	Trips	Days	Length (miles)	Total (miles)	MPG	Gallons
Excavation	40	85				
Piles	50	45				
Construction	300	500				
Arch Coating	250	173				
Total	640	803	18.5	9,507,520	24	396,147
Total (round trips)						792,294
Fuel efficiency calculated using fuel consumption and VMT from ENFAC2021 v1.0.2. Total is doubled to account for round-trips.						

Calculation of Diesel Usage During Construction (On-road vender)						
Phase	Trips	Days	Length (miles)	Total (miles)	MPG	Gallons
Construction	62	500	10.2	316,200	8	39,525
Total (round trips)						79,050
Fuel efficiency calculated using fuel consumption and VMT from ENFAC2021 v1.0.2. Total is doubled to account for round-trips.						

Calculation of Diesel Usage During Construction (On-road haul)						
Phase	Trips	Days	Length (miles)	Total (mil)	MPG	Gallons
Revised Project						
Excavation	67	85	40	227,800	8	28,475
Total (round trips)						56,950
SCEA Project						
Excavation	6,990 trips total		40	279,600	8	34,950
Total (round trips)						69,900
Fuel efficiency calculated using fuel consumption and VMT from ENFAC2021 v1.0.2. Total is doubled to account for round-trips. SCEA Project: CalEEMod 2020.4.0. Haul Trips are totaled in this version. Revised Project: CalEEMod 2022.1.1.14.						

Calculation of Diesel Usage During Construction (Off-road equipment)								
Phase	Equipment	Units	Hours	HP	Load Factor	Ave. Daily Factor	Days	HP-hours
Excavation	Rubber Tired Dozers	1	8	367	0.40	0.6	85	59,894
	Tractors/Loaders/Backhoes	2	7	84	0.37	0.6	85	22,191
	Excavators	2	8	158	0.38	0.6	85	48,993
	Rollers	1	8	36	0.38	0.6	85	5,581
Piles	Tractors/Loaders/Backhoes	1	8	84	0.37	0.6	45	6,713
	Bore/Drill Rigs	1	8	221	0.50	0.6	45	23,868
	Cement and Mortar Mixers	1	8	10	0.56	0.6	45	1,210
	Cranes	1	8	367	0.29	0.6	45	22,989
	Excavators	1	8	158	0.38	0.6	45	12,968
	Pumps	1	8	11	0.74	0.6	45	1,758
Construction	Tractors/Loaders/Backhoes	1	8	84	0.37	0.6	500	74,592

	Cranes	1	8	367	0.29	0.6	500	255,432
	Forklifts	1	8	82	0.20	0.6	500	39,360
	Welders	3	8	46	0.45	0.6	500	149,040
Arch Coatings	Air Compressors	1	8	37	0.48	0.6	173	14,747
Total								739,338
Total (diesel)								36,967

HP = horsepower

gallons of diesel fuel per HP-hour= 0.05

Equipment assumptions are provide in the CalEEMod output files and fuel usage estimate of 0.05 gallons of diesel fuel per horsepower-hour is from the SCAQMD CEQA Air Quality Handbook, Table A9-3E.

858,907 HP-hours = 42,945 gallons.

Water Usage for fugitive dust control during construction					
Phase	Days	Acres	Water Rate	Electrical Rate	Total
Grading	85	1.83	3,020 gallons / acre	0.009727 kWh / gallon	4,569 kWh

kWh – kilowatt hours
 Conservatively assumes the total amount of site that would be disturbed.
 Gallons per year of water usage for dust control is calculated based on a minimum control efficiency of 66% (three times daily) with an application rate of 3,020 gallons/acre/day (Air & Waste Management Association Air Pollution Engineering Manual (1992 Edition)) and average of 26 construction days per month.
 CalEEMod Default: Each gallon of delivered potable water in Southern California is associated with 0.009727 kWh of electricity).

Construction Electricity Usage							
Equipment	Peak Power Rating	Typical Load	Average Output	Hours Per Day	Average Daily Output	Construction Days	Total
Caterpillar 40-C4.4 Generator	36 kWh	70%	25.2 kWh	4	100.8 kWh	803	80,942 kWh

Operation Page

Gasoline and Diesel Use – Operation (SCEA Project and Revised Project)				
Percent of Fleet			Fuel Consumption	
Fleet	94.4% Auto	4,063,217 miles	24 mpg gas	169,300
Mix	5.6% Other	240,783 miles	8 mpg diesel	30,098
Total				199,398
Daily VMT = 11,780 from Gibson Transportation Consulting, June 2022.				
Daily x 365 days = Annual VMT = 4,299,700				
Percent fleet based on VMT from ENFAC2021 v1.0.2				
Fuel efficiency calculated using fuel consumption and VMT from ENFAC2021 v1.0.2.				

Electricity by Land Use – Operation		
Use		Amount (kWh/year)
Revised Project		
Proposed	Apartments	952,213
	Parking	518,749
	Restaurant	171,319
Total		1,642,281
SCEA Project		
Proposed	Apartments	1,110,870
	Parking	401,541
	Restaurant	324,525
Total		1,836,936
SCEA Project: CalEEMod 2020.4.0		
Revised Project: CalEEMod 2022.1.1.14.		

Electricity by Water Use – Operation (SCEA Project)		
Use (gallons/day)	Use (gallons/year)	Amount (kWh/year)
Revised Project		
120,980	44,157,700	490,150
SCEA Project		
125,480	45,800,200	508,382
Net increase.		
Indoor water results in 0.0111 kWh of electricity usage per gallon from delivery, treatment, and distribution of water within Southern California (CalEEMod).		
Water delivery assumed to be reduced for the commercial reduction (from 7,500 sf to 5,260 sf), a 30% percent reduction, which is equivalent to a 4,500 gallon reduction. All other portions remain the same.		

Natural Gas by Land Use – Operation			
Use		Amount (kBTU/year)	Amount (cf/year)
Revised Project			
Proposed	Apartments	0	
	Parking	0	
	Restaurant	498,278	

Total		498,278	474,455
SCEA Project			
Proposed	Apartments	2,613,130	
	Parking	0	
	Restaurant	1,727,470	
Total		4,340,600	4,142,472
SCEA Project: CalEEMod 2020.4.0 Revised Project: CalEEMod 2022.1.1.14. 1 kBTU = 0.95238 cubic foot.			

Source: EMFAC2021 (v1.0.2) Emissions Inventory

Region Type: Statewide

Region: California

Calendar Year: 2023

Season: Annual

Vehicle Classification: EMFAC202x Categories

Units: miles/day for CVMT and EVMT, trips/day for Trips, kWh/day for Energy Consumption,

Region	Calendar Year	Vehicle Category	Model Year	Speed	Fuel	Population
Statewide Total	2023	LDA	Aggregate	Aggregate	Gasoline	13036208.3
Statewide Total	2023	LDT1	Aggregate	Aggregate	Gasoline	1352184.58
Statewide Total	2023	LDT2	Aggregate	Aggregate	Gasoline	6085858.68
Statewide Total	2023	LHD1	Aggregate	Aggregate	Gasoline	539256.906
Statewide Total	2023	LHD2	Aggregate	Aggregate	Gasoline	76955.762
Statewide Total	2023	MCY	Aggregate	Aggregate	Gasoline	691728.052
Statewide Total	2023	MDV	Aggregate	Aggregate	Gasoline	4197950.74
Statewide Total	2023	MH	Aggregate	Aggregate	Gasoline	89319.8603
Statewide Total	2023	OBUS	Aggregate	Aggregate	Gasoline	13662.362
Statewide Total	2023	SBUS	Aggregate	Aggregate	Gasoline	6403.73052
Statewide Total	2023	T6TS	Aggregate	Aggregate	Gasoline	50417.1497
Statewide Total	2023	T7IS	Aggregate	Aggregate	Gasoline	189.079135
Statewide Total	2023	UBUS	Aggregate	Aggregate	Gasoline	2809.41005

tons/day for Emissions, 1000 gallons/day for Fuel Consumption

Total VMT	Fuel Consumption
510256809	17745.3041
45737125.5	1914.26276
241447853	10396.5189
20090803.9	1864.96418
2814627.27	290.246067
4087441.34	100.760006
155724580	8227.667
806575.876	174.62023
631183.225	130.070323
339813.089	36.0452807
2694425.77	548.32104
10317.7503	2.79414579
241270.191	37.6931918
984882826	41469.2672

Source: EMFAC2021 (v1.0.2) Emissions Inventory

Region Type: Statewide

Region: California

Calendar Year: 2023

Season: Annual

Vehicle Classification: EMFAC202x Categories

Units: miles/day for CVMT and EVMT, trips/day for Trips, kWh/day for Energy Consumption,

Region	Calendar Year	Vehicle Category	Model Year	Speed	Fuel	Population
Statewide Total	2023	All Other Buses	Aggregate	Aggregate	Diesel	7797.81616
Statewide Total	2023	LDA	Aggregate	Aggregate	Diesel	49454.8909
Statewide Total	2023	LDT1	Aggregate	Aggregate	Diesel	750.010339
Statewide Total	2023	LDT2	Aggregate	Aggregate	Diesel	20752.7329
Statewide Total	2023	LHD1	Aggregate	Aggregate	Diesel	388878.687
Statewide Total	2023	LHD2	Aggregate	Aggregate	Diesel	148912.626
Statewide Total	2023	MDV	Aggregate	Aggregate	Diesel	65867.5619
Statewide Total	2023	MH	Aggregate	Aggregate	Diesel	35755.2649
Statewide Total	2023	Motor Coach	Aggregate	Aggregate	Diesel	1936.47403
Statewide Total	2023	PTO	Aggregate	Aggregate	Diesel	0
Statewide Total	2023	SBUS	Aggregate	Aggregate	Diesel	19414.9118
Statewide Total	2023	T6 CAIRP Class	Aggregate	Aggregate	Diesel	216.662308
Statewide Total	2023	T6 CAIRP Class	Aggregate	Aggregate	Diesel	290.703976
Statewide Total	2023	T6 CAIRP Class	Aggregate	Aggregate	Diesel	918.046425
Statewide Total	2023	T6 CAIRP Class	Aggregate	Aggregate	Diesel	1584.03002
Statewide Total	2023	T6 Instate Diesel	Aggregate	Aggregate	Diesel	14687.7946
Statewide Total	2023	T6 Instate Diesel	Aggregate	Aggregate	Diesel	12558.4236
Statewide Total	2023	T6 Instate Diesel	Aggregate	Aggregate	Diesel	38532.1243
Statewide Total	2023	T6 Instate Diesel	Aggregate	Aggregate	Diesel	7968.49617
Statewide Total	2023	T6 Instate Other	Aggregate	Aggregate	Diesel	25688.2921
Statewide Total	2023	T6 Instate Other	Aggregate	Aggregate	Diesel	56827.3209
Statewide Total	2023	T6 Instate Other	Aggregate	Aggregate	Diesel	46556.5784
Statewide Total	2023	T6 Instate Other	Aggregate	Aggregate	Diesel	24998.3828
Statewide Total	2023	T6 Instate Trucks	Aggregate	Aggregate	Diesel	469.984693
Statewide Total	2023	T6 Instate Trucks	Aggregate	Aggregate	Diesel	11548.1023
Statewide Total	2023	T6 OOS Class	Aggregate	Aggregate	Diesel	125.303231
Statewide Total	2023	T6 OOS Class	Aggregate	Aggregate	Diesel	167.412905
Statewide Total	2023	T6 OOS Class	Aggregate	Aggregate	Diesel	530.386006
Statewide Total	2023	T6 OOS Class	Aggregate	Aggregate	Diesel	861.434081
Statewide Total	2023	T6 Public Class	Aggregate	Aggregate	Diesel	3327.57662
Statewide Total	2023	T6 Public Class	Aggregate	Aggregate	Diesel	4899.46535
Statewide Total	2023	T6 Public Class	Aggregate	Aggregate	Diesel	4581.06089
Statewide Total	2023	T6 Public Class	Aggregate	Aggregate	Diesel	12233.4354
Statewide Total	2023	T6 Utility Class	Aggregate	Aggregate	Diesel	2592.30293

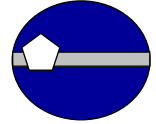
Statewide Tc	2023	T6 Utility Cla	Aggregate	Diesel	505.362373
Statewide Tc	2023	T6 Utility Cla	Aggregate	Diesel	564.62864
Statewide Tc	2023	T7 CAIRP Cla	Aggregate	Diesel	52091.6476
Statewide Tc	2023	T7 NNOOS C	Aggregate	Diesel	46718.1177
Statewide Tc	2023	T7 NOOS Cla	Aggregate	Diesel	19552.4013
Statewide Tc	2023	T7 Other Por	Aggregate	Diesel	1516.74931
Statewide Tc	2023	T7 POAK Cla	Aggregate	Diesel	4519.20511
Statewide Tc	2023	T7 POLA Clas	Aggregate	Diesel	16655.9466
Statewide Tc	2023	T7 Public Cla	Aggregate	Diesel	22903.8694
Statewide Tc	2023	T7 Single Cor	Aggregate	Diesel	5161.18099
Statewide Tc	2023	T7 Single Du	Aggregate	Diesel	13270.0769
Statewide Tc	2023	T7 Single Otl	Aggregate	Diesel	29818.1797
Statewide Tc	2023	T7 SWCV Cla	Aggregate	Diesel	6946.93159
Statewide Tc	2023	T7 Tractor Cl	Aggregate	Diesel	75942.0699
Statewide Tc	2023	T7 Utility Cla	Aggregate	Diesel	1825.28554
Statewide Tc	2023	UBUS	Aggregate	Diesel	3568.88788

tons/day for Emissions, 1000 gallons/day for Fuel Consumption

Total VMT Fuel Consumption

445971.486	50.5327875
1518369.79	36.6433659
10858.4552	0.45771772
867791.858	27.7284841
14676625.8	850.345012
5867400.09	408.552546
2599891.91	110.012496
338930.539	34.8978698
275900.98	50.1813488
602130.61	123.330098
430279.187	54.3133025
14608.7226	1.63460643
20042.5353	2.23963816
52339.7045	5.76705032
328424.739	33.9854557
499260.104	58.6431193
435704.057	51.0518464
1328566.43	154.856747
439669.503	49.9662058
1061856.8	122.642536
2510050.29	290.606353
2000189.13	230.575388
1197089.82	135.476986
24183.9674	2.74944631
719581.374	77.4759758
8372.48729	0.93626817
11485.547	1.28307519
30012.0629	3.30407046
218225.017	22.461629
113678.155	14.4881261
180670.243	22.9618218
157751.21	20.1241881
537140.073	67.2532277
105509.52	11.6983397

20425.6177	2.25681358
27846.5134	3.06553517
10733863.8	1769.18604
12726307.9	2078.90455
4623223.34	763.531807
284629.416	47.9060103
454514.315	78.0542335
2180533.37	365.130505
966260.869	181.525787
363768.91	61.3652278
805510.648	137.788614
1705009.42	287.640946
450498.9	177.81824
6094378.6	1000.7049
84328.4872	14.1623283
358275.838	44.6121909
81507938.2	10142.8309



GeoPentech

June 22, 2023
Project No. 21086A

Ed Tung
Director, Development
Carmel Partners
429 Santa Monica Blvd. Suite 700
Santa Monica, CA 90401

**SUBJECT: Review of Updated Architectural Drawings
Proposed Mixed-Use Development
1022-1066 La Cienega Boulevard
Los Angeles, California 90035**

**TRACT: TR 7170
LOT(S): 119-122, 233-237
LOCATION: 1022-1066 La Cienega Blvd.**

Dear Mr. Tung:

This letter has been prepared to document our review of the updated architectural drawings by SCB Architects for the proposed mixed-use development at 1022-1066 La Cienega Blvd in Los Angeles, CA.

Based on our review, we now understand that the proposed development now includes the design and construction of a 24-story high-rise tower with one subterranean level on the southern part of the site with three parking levels (one subterranean and two above ground) and an amenity deck covering most of the remainder of the site (collectively referred to as podium). The height of the tower will be about 270 feet above grade, and the subterranean level will extend about 10 to 20 feet below grade.

GeoPentech has performed a geotechnical investigation for the project for a previous configuration where the Tower was located at the northern part of the site. The results of our investigation were presented in a report dated March 30, 2022. This letter confirms that all our geological assessments and geotechnical recommendations included in our report dated March 30, 2022 remain applicable for the updated layout of the proposed development.

We trust this letter meets your current needs and we look forward to continuing our work with you on this project. If you have any questions or need additional information, please call us at your convenience.

Very truly yours,

GeoPentech, Inc.

Mandro M. Eslami, Ph.D., PE
Project Engineer



Rambod Hadidi, Ph.D., GE
Associate



Air Quality, Greenhouse Gases, Noise Analysis

noah tanski environmental consulting

email: noah@ntenvironmental.net
call/text: 310-722-6346

Date: July 17, 2023
To: Stacie Henderson
CAJA
From: Noah Tanski, Principal
NTEC
Subject: **Noise Impact Evaluation of the 1050 La Cienega Boulevard Project and the Revised Project**

Dear Stacie:

As requested, Noah Tanski Environmental Consulting (NTEC) has evaluated the noise impacts that would result from construction and operations of the Revised 1050 La Cienega Boulevard Project (Revised Project) and compared them to impacts that were estimated for the version of the Project addressed by the 1050 La Cienega Boulevard Project Sustainable Communities Environmental Assessment (SCEA Project). The SCEA Project proposes to construct a 28-story mixed-use high-rise building consisting of 290 residential units and 7,500 square feet of ground floor commercial space. The Revised Project proposes moving the tower structure south on the Site, reducing its height by 4 stories to 24 stories, reducing the commercial space by 2,240 square feet to 5,260 square feet, and reducing the soil export amount by 3,243 cubic yards to 45,670 cubic yards.

Overall, noise impacts associated with the Revised Project would remain less than significant after mitigation. This memorandum presents my analysis and findings.

- 1. Would the Revised Project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

On-Site Construction Activities

The SCEA concludes that on-site construction activities for the SCEA Project would result in a less than significant impact after the incorporation of Mitigation Measures MM-NOI-1 through MM-NOI-7. It bases this determination on the analysis of three “worst-case” construction phases: bulk excavation, auger-cast pile installation, and deep soil mixing (DSM) column installation. The Revised Project, its construction, and its land uses are mostly similar to the SCEA Project. There are minor differences in square footage, and the Revised Project would require somewhat less soil export (45,670 cubic yards versus 48,913 cubic yards), but it is estimated that construction of the Revised Project would ultimately require similar construction equipment performing similar tasks for similar periods of time as the SCEA Project. As such,

bulk excavation, auger-cast pile installation, and DSM column installation would also represent the “worst-case” construction phases for the Revised Project. Impacts associated with these phases are evaluated below. Notably, the Revised Project would shift the location of the proposed high-rise tower to the south of the project site. It would also increase the setback between the proposed podium structure and neighboring residential uses to the east. Whereas the SCEA Project incorporates a minimum 15-foot setback from these residential uses, the Revised Project would incorporate a minimum 28-foot setback, adding separation between construction activities and these uses. Evaluation of the following three construction phases accounts for these changes in the Revised Project.

Bulk Excavation

The SCEA concludes that noise impacts from the SCEA Project’s bulk excavation activities would result in less than significant impacts at Temple Beth Am, Pressman Academy, Beverly Park Senior Apartments, and La Cienega Park, but a potentially significant 18.9 dBA L_{eq} increase at South Alfred Street Residences. Impacts are shown in Table XIII-5 of the SCEA. However, implementation of Mitigation Measures MM-NOI-1 and MM-NOI-2 would reduce the impact at South Alfred Street Residences (including at its 2nd and 3rd story levels) to no more than a 4.0 dBA L_{eq} increase that is below the 5 dBA L_{eq} noise increase threshold and therefore less than significant.

The area of excavation for the Revised Project would be similar to the SCEA Project, except that the minimum 15-foot setback from South Alfred Street Residences would be increased to a minimum 28-foot setback from this receptor. This means that for Temple Beth Am, Pressman Academy, Beverly Park Senior Apartments, and La Cienega Park, bulk excavation construction equipment – assumed to be excavators – would operate at similar distances from these receptors. As such, bulk excavation-related impacts under the Revised Project would be the same as the SCEA Project for these receptors. However, impacts would be slightly reduced at South Alfred Street Residences because of the additional setback from this receptor. Unmitigated impacts at South Alfred Street Residences would be slightly less than the potentially significant 18.9 dBA L_{eq} increase disclosed in the SCEA, and mitigated impacts after the implementation of Mitigation Measures MM-NOI-1 and MM-NOI-2 would be slightly lower than the mitigated noise increases shown in Table XIII-8 of the SCEA, which are a 4.0 dBA L_{eq} increase for the ground level of South Alfred Street Residences, a 2.1 dBA L_{eq} increase for the 2nd story, and a 1.9 dBA L_{eq} increase for the 3rd story. Therefore, impacts associated with bulk excavation of the Revised Project would remain less than significant after mitigation.

It is also worth noting that the Revised Project would only require 45,670 cubic yards of earthwork export, compared to the SCEA Project’s 48,913 cubic yard requirement. Therefore, the duration of bulk excavation associated with the Revised Project, as well as the intensity of daily activities, may also be slightly reduced in comparison.

Auger-Cast Pile Installation

The SCEA explains that if the SCEA Project utilizes auger-cast piles, they would be installed under the footprint of the proposed tower. For the Revised Project, the location of the proposed tower would be moved to the south portion of the project site, meaning that auger-cast pile installation activities would also move to this new location, though concrete pump and mixing trucks would still operate from locations along La Cienega Boulevard. A detailed explanation of auger-cast pile installation equipment and activities can be found in the SCEA.

The SCEA concludes that noise impacts from the SCEA Project’s auger-cast pile installation activities would result in less than significant impacts at La Cienega Park, but potentially significant noise impacts at South Alfred Street Residences, Temple Beth Am, Pressman Academy, and Beverly Park Senior Apartments. The SCEA Project’s unmitigated noise impacts from auger-cast pile installation activities are shown in **Table 1**, below.

Table 1
SCEA Project: Construction Noise Levels – Auger-Cast Pile Installation (Unmitigated)

Receptor	Construction Noise Level (dBA L _{eq})	Existing Ambient Noise Level (dBA L _{eq})	New Noise Level (dBA L _{eq})	Increase
South Alfred Street Residences	77.0	62.1	77.2	15.1
Temple Beth Am	75.1	69.2	76.1	6.9
Pressman Academy	75.1	69.2	76.1	6.9
Beverly Park Senior Apartments	69.5	65.7	71.0	5.3
La Cienega Park	64.4	69.2	70.4	1.2
Source: SCEA Table XIII-6.				

Implementation of Mitigation Measures MM-NOI-1, MM-NOI-3, MM-NOI-4, and MM-NOI-5 would reduce impacts at all receptors to below the threshold of significance. The SCEA Project’s mitigated noise impacts from auger-cast pile installation activities are shown in **Table 2**, below.

Table 2
SCEA Project: Construction Noise Levels – Auger-Cast Pile Installation (Mitigated)

Receptor	Mitigated Construction Noise Level (dBA L _{eq})	Existing Ambient Noise Level (dBA L _{eq})	New Noise Level (dBA L _{eq})	Increase
South Alfred Street Residences – Ground Level	62.0	62.1	65.1	3.0
South Alfred Street Residences – 2 nd Story	58.4	62.1	63.6	1.5
South Alfred Street Residences – 3 rd Story (1023 S. Alfred St.)	58.9	62.1	63.8	1.7
Temple Beth Am – Ground Level	65.3	69.2	70.7	1.5
Temple Beth Am – Top Level	65.3	69.2	70.7	1.5
Pressman Academy – Ground Level	65.3	69.2	70.7	1.5

Pressman Academy – Top Level	65.3	69.2	70.7	1.5
Beverly Park Senior Apartments – Ground Level	59.2	65.7	66.6	0.9
Beverly Park Senior Apartments – Top Level	59.2	65.7	66.6	0.9
Source: SCEA Table XIII-9.				

For the Revised Project, unmitigated and mitigated auger-cast pile installation noise impacts at South Alfred Street Residences, Temple Beth Am, and Pressman Academy would be similar to impacts evaluated for the SCEA Project that are shown in Table 1 and Table 2. This is because distances between these receptors and the new tower footprint location, as well as locations along La Cienega Boulevard where concrete pump and mixing trucks would operate, would be similar to the scenario evaluated for the SCEA Project. As shown in Table 1, unmitigated impacts to these receptors would be potentially significant as they would exceed the 5 dBA L_{eq} noise increase threshold of significance. However, as shown in Table 2, impacts would be below this threshold and less than significant after implementation of Mitigation Measures MM-NOI-1, MM-NOI-3, MM-NOI-4, and MM-NOI-5.

La Cienega Park would be located farther from the Revised Project’s tower footprint where auger-cast pile installation activities would occur. Therefore, unmitigated noise impacts at La Cienega Park would be lower than the 1.2 dBA L_{eq} noise increase shown in Table 1 and similarly less than significant.

Beverly Park Senior Apartments would be located closer to the tower footprint where auger-cast pile installation activities would occur. To address this, the Revised Project’s auger-cast pile installation noise impacts at Beverly Park Senior Apartments have been recalculated based on the new location of the tower footprint, which is where most construction equipment would operate. Similar to the SCEA analysis, noise impacts have been conservatively modeled assuming that all construction vehicles and equipment would spend an entire workday operating at fixed, minimum equipment-to-receptor distances. This screening analysis maximizes construction noise projections. Further explanation regarding this modeling approach can be found in the SCEA. According to this analysis, the Revised Project’s unmitigated noise impacts at Beverly Park Senior Apartments would be 9.9 dBA L_{eq} , greater than the SCEA Project’s unmitigated 5.3 dBA L_{eq} impact at this receptor. However, similar to the SCEA Project, implementation of Mitigation Measures MM-NOI-1, MM-NOI-3, MM-NOI-4, and MM-NOI-5 would reduce this impact to a less than significant level. After mitigation, impacts to the ground level of Beverly Park Senior Park Apartments would be 2.8 dBA L_{eq} and impacts to the top level would be 3.0 dBA L_{eq} . These impacts are greater than the SCEA Project’s 0.9 dBA L_{eq} impacts for this receptor but similarly below the 5 dBA L_{eq} noise increase threshold and therefore less than significant.

In conclusion, the Revised Project’s impacts from auger-cast pile installation would be similar to the SCEA Project’s impacts at Alfred Street Residences, Temple Beth Am, and Pressman Academy. The Revised Project’s impacts to La Cienega Park would be reduced in comparison. At Beverly Park Senior Apartments, unmitigated and mitigated impacts would exceed the SCEA Project’s impacts but would similarly be less than significant after the implementation of Mitigation Measures MM-NOI-1, MM-NOI-3, MM-NOI-4, and MM-NOI-5. It is additionally worth noting that the duration of the Revised Project’s auger-cast pile

installation phase would also be similar to the duration of the SCEA Project’s phase. As such, the duration of less than significant impacts would be similar under either project.

DSM Column Installation

The SCEA explains that if the SCEA Project utilizes DSM columns, they would be installed under the footprint of the proposed tower. For the Revised Project, the location of the proposed tower would be moved to the south portion of the project site, meaning that DSM column installation activities would also move to this new location. A detailed explanation of DSM column installation equipment and activities can be found in the SCEA.

The SCEA concludes that noise impacts from the SCEA Project’s DSM column installation activities would result in less than significant impacts at La Cienega Park, but potentially significant noise impacts at South Alfred Street Residences, Temple Beth Am, Pressman Academy, and Beverly Park Senior Apartments. The SCEA Project’s unmitigated noise impacts from DSM column installation activities are shown in **Table 3**, below.

Table 3
SCEA Project: Construction Noise Levels – DSM Column Installation (Unmitigated)

Receptor	Construction Noise Level (dBA L _{eq})	Existing Ambient Noise Level (dBA L _{eq})	New Noise Level (dBA L _{eq})	Increase
South Alfred Street Residences	78.8	62.1	78.9	16.8
Temple Beth Am	75.0	69.2	76.0	6.8
Pressman Academy	75.0	69.2	76.0	6.8
Beverly Park Senior Apartments	71.1	65.7	72.2	6.5
La Cienega Park	66.5	69.2	71.1	1.9
Source: SCEA Table XIII-7.				

Implementation of Mitigation Measures MM-NOI-1, MM-NOI-3, MM-NOI-6, and MM-NOI-7 would reduce impacts at all receptors to below the threshold of significance. The SCEA Project’s mitigated noise impacts from DSM column installation activities are shown in **Table 4**, below.

Table 4
SCEA Project: Construction Noise Levels – DSM Column Installation (Mitigated)

Receptor	Mitigated Construction Noise Level (dBA L _{eq})	Existing Ambient Noise Level (dBA L _{eq})	New Noise Level (dBA L _{eq})	Increase
South Alfred Street Residences – Ground Level	63.8	62.1	66.1	4.0

South Alfred Street Residences – 2 nd Story	60.1	62.1	64.2	2.1
South Alfred Street Residences – 3 rd Story (1023 S. Alfred St.)	60.9	62.1	64.6	2.5
Temple Beth Am – Ground Level	60.4	69.2	69.7	0.5
Temple Beth Am – Top Level	68.1	69.2	71.7	2.5
Pressman Academy – Ground Level	60.4	69.2	69.7	0.5
Pressman Academy – Top Level	68.1	69.2	71.7	2.5
Beverly Park Senior Apartments – Ground Level	57.0	65.7	66.3	0.6
Beverly Park Senior Apartments – Top Level	67.7	65.7	69.8	4.1
Source: SCEA Table XIII-10.				

For the Revised Project, unmitigated and mitigated DSM column installation noise impacts at South Alfred Street Residences, Temple Beth Am, and Pressman Academy would be similar to impacts evaluated for the SCEA Project that are shown in Table 1 and Table 2. This is because distances between these receptors and the new tower footprint location would be similar to the scenario evaluated for the SCEA Project. As shown in Table 3, unmitigated impacts to these receptors would be potentially significant as they would exceed the 5 dBA L_{eq} noise increase threshold of significance. However, as shown in Table 4, impacts would be below this threshold and less than significant after implementation of Mitigation Measures MM-NOI-1, MM-NOI-3, MM-NOI-6, and MM-NOI-7.

La Cienega Park would be located farther from the Revised Project's tower footprint where DSM column installation activities would occur. Therefore, unmitigated noise impacts at La Cienega Park would be lower than the 1.9 dBA L_{eq} noise impact shown in Table 3 and similarly less than significant.

Beverly Park Senior Apartments would be located closer to the tower footprint where DSM column installation activities would occur. To address this, the Revised Project's DSM column installation noise impacts at Beverly Park Senior Apartments have been recalculated based on the new location of the tower footprint, which is where most construction equipment would operate. Similar to the SCEA analysis, noise impacts have been conservatively modeled assuming that all construction vehicles and equipment would spend an entire workday operating at fixed, minimum equipment-to-receptor distances. This screening analysis maximizes construction noise projections. Further explanation regarding this modeling approach can be found in the SCEA.

According to this analysis, the Revised Project's unmitigated noise impacts at Beverly Park Senior Apartments would be 9.5 dBA L_{eq} , greater than the SCEA Project's unmitigated 6.5 dBA L_{eq} impact at this receptor. However, similar to the SCEA Project, implementation of Mitigation Measures MM-NOI-1, MM-NOI-3, MM-NOI-6, and MM-NOI-7 would reduce this impact to a less than significant level. After mitigation, impacts to the ground level of Beverly Park Senior Apartments would be 1.2 dBA L_{eq} and

impacts to the top level would be 3.3 dBA L_{eq} . The Revised Project's mitigated 1.2 dBA L_{eq} impact to the ground level of Beverly Park Senior Apartments would be slightly higher than the SCEA Project's mitigated 0.6 dBA L_{eq} impact at this location. The Revised Project's mitigated 3.3 dBA L_{eq} impact to the top level of Beverly Park Senior Apartments would be slightly lower than the SCEA Project's mitigated 4.1 dBA L_{eq} impact at this location. Both impacts would be below the 5 dBA L_{eq} noise increase threshold and therefore less than significant, similar to the SCEA Project's impacts.

In conclusion, the Revised Project's impacts from DSM column installation would be similar to the SCEA Project's impacts at Alfred Street Residences, Temple Beth Am, and Pressman Academy. The Revised Project's impacts to La Cienega Park would be reduced in comparison. At Beverly Park Senior Apartments, unmitigated impacts would exceed the SCEA Project's impacts, but mitigated impacts would be similar and also less than significant after the implementation of Mitigation Measures MM-NOI-1, MM-NOI-3, MM-NOI-6, and MM-NOI-7. It is additionally worth noting that the duration of the Revised Project's DSM column installation phase would also be similar to the duration of the SCEA Project's phase. As such, the duration of less than significant impacts would be similar under either project.

Other Construction Activities

It is worth noting that bulk excavation, auger-cast pile installation, and DSM column installation – which are the “worst case” phases for both the SCEA Project and the Revised Project – would last no longer than approximately 6-8 months under either project scenario. Other construction activities such as vertical construction, application of architectural coatings, and finishing would last much longer – up to approximately 26 months in either project scenario. Thus, the Revised Project would result in a similar duration of construction as the SCEA Project.

Furthermore, similar to the SCEA Project, these other construction activities would not extensively utilize heavy-duty off-road construction equipment to the extent that bulk excavation, auger-cast pile installation, and DSM column installation would. Therefore, as explained in the SCEA, impacts from these phases would not exceed those that have been assessed in the SCEA for the SCEA Project. The same is true for the Revised Project.

Despite the Revised Project's relocated tower, distances from Temple Beth Am, Pressman Academy, Beverly Park Senior Apartments, and La Cienega Park to the Revised Project's frontage along La Cienega Boulevard would be the same as for the SCEA Project. Therefore, vertical construction, architectural coatings, and finishing activities occurring along this frontage would result in the same less than significant impacts at these receptors. For South Alfred Street Residences, which in many ways can be considered the most-sensitive receptor, the Revised Project would result in a minimum 13 feet of additional setback between the proposed podium structure and this receptor. This would marginally reduce noise impacts from vertical construction, architectural coatings, and finishing activities at South Alfred Street Residences, as compared to the SCEA Project. However, as noted, noise levels from these activities would be substantially less than noise levels associated with bulk excavation, auger-cast pile installation, and DSM column installation activities and would result in less than significant impacts at South Alfred Street Residences (and the other nearby sensitive receptors) under either project scenario. As explained in the SCEA, reference noise levels from heavy-duty off-road construction equipment such as excavators, auger drills, and slurry batch plants are in excess of 70 dBA L_{eq} at a reference distance of 50 feet and can even exceed 85 dBA L_{eq} at 50 feet. Noise levels from the types of pneumatic, electric, and hand tools that are primarily used in vertical construction, architectural coatings, and finishing activities are much lower. For

example, electric sander noise levels are approximately 55 dBA L_{eq} at 50 feet. Reciprocating saw noise levels are approximately 53.7 dBA L_{eq} at the same distance. Noise levels of impact wrenches are approximately 58.3 dBA L_{eq} at 50 feet. For angle grinders, noise levels at 50 feet are approximately 57.6 dBA L_{eq} . Noise levels associated with heavy-duty off-road construction equipment are substantially louder than ambient noise levels surrounding the project site and nearby sensitive receptors, but noise levels associated with these smaller tools are less than ambient noise levels.

Section 112.05 Construction Noise Levels

The SCEA explains that many of the SCEA Project's construction vehicles and equipment would produce noise levels in excess of 75 dBA L_{eq} at a distance of 50 feet and that this would at times expose South Alfred Street Residences and Beverly Park Senior Apartments – the SCEA Project's nearest residential sensitive receptors – to noise levels in excess of 75 dBA L_{eq} . However, after implementation of Mitigation Measures MM-NOI-1 through MM-NOI-7, the SCEA Project's construction noise levels would be reduced to below 75 dBA L_{eq} at these residences, thus ensuring compliance with LAMC Section 112.05. The SCEA notes that LAMC Section 112.05 is not an adopted threshold of significance and that analysis pursuant to LAMC Section 112.05 compliance is disclosed informationally.

Similar to the SCEA Project, the Revised Project could at times expose South Alfred Street Residences and Beverly Park Senior Apartments to unmitigated construction noise levels in excess of 75 dBA L_{eq} . However, after implementation of the Mitigation Measures MM-NOI-1 through MM-NOI-7, impacts would similarly be reduced to below 75 dBA L_{eq} at these residences, also ensuring compliance with LAMC Section 112.05.

Off-Site Construction Activities

The SCEA concludes that off-site construction noise impacts related to the SCEA Project would be less than significant. The SCEA Project would require the removal of approximately 48,913 cubic yards of cut soils from the site. This removal would generate up to 250 haul trips per day during the SCEA Project's excavation phase. According to modeling conducted for the SCEA Project, this haul trip generation would not result in significant roadside noise increases at receptors located along La Cienega Boulevard.

Though the Revised Project would only require 45,670 cubic yards of export, its maximum haul trip generation would similarly be up to 250 haul trips per day. Thus, noise increases generated by the Revised Project's haul trips would be similar to the SCEA Project's modeled noise increases and likewise less than significant. However, the duration of the Revised Project's excavation and off-site hauling would be reduced in comparison to the SCEA Project on account of its lesser export requirements.

On-Site Operational Noise

The SCEA concludes that the SCEA Project's on-site operational noise from mechanical equipment, auto-related activities, amenity space/open space, and commercial restaurant space would not have the potential to expose nearby sensitive receptors to noise increases in excess of the minimum 3 dBA CNEL increase that would represent a significant impact.

The Revised Project proposes the development of the same land uses at the same site and therefore would result in similar less than significant noise increases (i.e., below 3 dBA CNEL) as the SCEA Project. Minor differences between the two projects include:

- 2,240 sf less commercial space for the Revised Project

- 7,749 sf additional open space for the Revised Project
- 14 less parking spaces for the Revised Project

However, these and other small changes would not result in substantial differences in on-site operational noise levels, much less significant impacts. The location of on-site uses also would not result in substantial differences. For example, the Revised Project’s ground level park would remain in the northern portion of the site and oriented towards La Cienega Boulevard and non-sensitive commercial uses to the site’s north. The ground floor commercial restaurant space would remain oriented towards La Cienega Boulevard, as well. The proposed pool area would be shifted away from South Alfred Street Residences, and the main seating/gathering areas for this pool would be re-oriented along La Cienega Boulevard. The podium’s distance from sensitive receptors along La Cienega Boulevard would be identical to the SCEA Project’s distance from these receptors; distance to South Alfred Street Residences would be increased. The Revised Project’s tower would be shifted to a southern location on the site, but distances from the tower to the nearest receptor, South Alfred Street Residences, would be similar under either proposal.

Off-Site Operational Noise

The SCEA concludes that the SCEA Project’s 1,852 daily vehicle trips would result in less than significant noise impacts along La Cienega Boulevard and other surrounding roadways. The Revised Project would contain the same number of residential units (290 units) as the SCEA Project and less commercial space, meaning that its daily vehicle trip generation would be equal to or slightly less than the SCEA Project’s trip generation. As a result, the Revised Project’s off-site operational noise impacts from traffic would be similar to the SCEA Project and also less than significant.

2. Would the Revised Project result in generation of excessive groundborne vibration or groundborne noise levels?

Construction

The SCEA concludes that groundborne vibration impacts from the SCEA Project’s earthmoving equipment and vibratory rollers would result in less than significant impacts at 1016 La Cienega Boulevard, Temple Beth Am, Pressman Academy, and Beverly Park Senior Apartments, but potentially significant impacts at South Alfred Street Residences and 1080 La Cienega Boulevard. The SCEA Project’s unmitigated groundborne vibration impacts from construction are shown in **Table 5**, below.

Table 5
SCEA Project: Building Damage Vibration Levels at Off-Site Structures –Unmitigated

Off-Site Structures	Distance to Project Site (feet)	Condition	Significance Criteria (in/sec PPV)	Impact (in/sec PPV)	Significant?
<i>Equipment: Large Earthmoving Vehicles</i>					
South Alfred Street Residences	15	IV. Buildings extremely susceptible to vibration damage	0.12	0.156	Yes
1080 La Cienega Blvd. (Commercial)	5	I. Reinforced concrete, steel, or timber	0.5	0.523	Yes

1016 La Cienega Blvd. (Commercial)	30	I. Reinforced concrete, steel, or timber	0.5	0.073	No
Temple Beth Am	100	I. Reinforced concrete, steel, or timber	0.5	0.019	No
Pressman Academy	100	I. Reinforced concrete, steel, or timber	0.5	0.019	No
Beverly Park Senior Apartments	100	I. Reinforced concrete, steel, or timber	0.5	0.019	No
<i>Equipment: Vibratory Rollers</i>					
South Alfred Street Residences	15	IV. Buildings extremely susceptible to vibration damage	0.12	0.368	Yes
1080 La Cienega Blvd. (Commercial)	5	I. Reinforced concrete, steel, or timber	0.5	1.233	Yes
1060 La Cienega Blvd. (Commercial)	30	I. Reinforced concrete, steel, or timber	0.5	0.172	No
Temple Beth Am	100	I. Reinforced concrete, steel, or timber	0.5	0.046	No
Pressman Academy	100	I. Reinforced concrete, steel, or timber	0.5	0.046	No
Beverly Park Senior Apartments	100	I. Reinforced concrete, steel, or timber	0.5	0.046	No
Source: SCEA Table XIII-12.					

Implementation of Mitigation Measures MM-NOI-8 through MM-NOI-10 would reduce impacts at South Alfred Street Residences and 1080 La Cienega Boulevard to below their respective thresholds of significance. The SCEA Project's mitigated groundborne vibration impacts are shown in **Table 6**, below.

Table 6
SCEA Project: Building Damage Vibration Levels at Off-Site Structures – Mitigated

Off-Site Structures	Distance to Project Site (feet)	Condition	Significance Criteria (in/sec PPV)	Impact (in/sec PPV)	Significant?
<i>Equipment: Large Earthmoving Vehicles</i>					
South Alfred Street Residences	20	IV. Buildings extremely susceptible to	0.12	0.114	No

		vibration damage			
1080 La Cienega Blvd. (Commercial)	6	I. Reinforced concrete, steel, or timber	0.5	0.428	No
<i>Equipment: Small Earthmoving Vehicles</i>					
South Alfred Street Residences	1	IV. Buildings extremely susceptible to vibration damage	0.12	0.103	No
1080 La Cienega Blvd. (Commercial)	1	I. Reinforced concrete, steel, or timber	0.5	0.103	No
<i>Equipment: Vibratory Rollers</i>					
South Alfred Street Residences	45	IV. Buildings extremely susceptible to vibration damage	0.12	0.110	No
1080 La Cienega Blvd. (Commercial)	15	I. Reinforced concrete, steel, or timber	0.5	0.368	No
Source: SCEA Table XIII-13.					

The Revised Project would utilize the same construction equipment that is addressed by the SCEA for the SCEA Project. For 1080 La Cienega Boulevard, 1016 La Cienega Boulevard, Temple Beth Am, Pressman Academy, and Beverly Park Senior Apartments, the Revised Project’s unmitigated groundborne vibration impacts would be similar to those evaluated by the SCEA Project and shown in Table 5 because distances between construction equipment and these receptors would be the same. Therefore, the Revised Project would also result in less than significant impacts 1016 La Cienega Boulevard, Temple Beth Am, Pressman Academy, and Beverly Park Senior Apartments, but potentially significant impacts at 1080 La Cienega Boulevard. However, as shown in Table 6, groundborne vibration impacts at 1080 La Cienega Boulevard would be below this threshold and less than significant after implementation of Mitigation Measures MM-NOI-8 and MM-NOI-9.

As explained throughout this memorandum, the Revised Project would be setback an additional 13 feet from South Alfred Street Residences. Whereas the SCEA Project would be setback a minimum 15 feet from this receptor, the Revised Project would be setback a minimum 28 feet. This would reduce the Revised Project’s groundborne vibration impacts at South Alfred Street Residences, as the Revised Project’s construction equipment would operate farther from this receptor than the SCEA Project’s equipment. Accounting for this increased setback, the Revised Project’s unmitigated groundborne vibration impact at South Alfred Street Residences from large earthmoving vehicles would be just 0.079 inches per second PPV, which is below this receptor’s conservative 0.12 inches per second PPV threshold of significance. However, the Revised Project’s unmitigated groundborne vibration impact at South Alfred Street Residences from vibratory rollers would be 0.185 inches per second PPV. This is below the SCEA Project’s

maximum unmitigated 0.368 inches per second PPV impact for this receptor, but nevertheless above this receptor's conservative 0.12 inches per second PPV threshold of significance. Therefore, like the SCEA Project, the Revised Project would result in a potentially significant groundborne vibration impact at South Alfred Street Residences.

However, similar to the SCEA Project, implementation of Mitigation Measures MM-NOI-8 through MM-NOI-10 would reduce this impact, as well as the potentially significant impact at 1080 La Cienega Boulevard, to below these receptors' applicable thresholds of significance. After mitigation, the Revised Project's groundborne vibration impacts at South Alfred Street Residences and 1080 La Cienega Boulevard would be same as the SCEA Project's impacts at these receptors that are shown in Table 6 and therefore less than significant.

REVISED PROJECT

Construction Noise Impact Analysis

noah tanski environmental consulting

Beverly Park Senior Apartments - Ground Level: Auger-Cast Pile Installation

Ambient Noise Level:	65.7 dBA Leq
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Unmitigated

Equipment Noise Levels

Equipment	Noise Level - dBA		Workday Noise Level
	Leq	Usage %	- dBA Leq
Auger Drill at 110ft	80.7	0.2	73.7
Skid Steer Loader at 110ft	65.6	0.2	58.6
Concrete Mixer Truck at 95ft	75.5	0.2	68.5
Pump at 95ft	67.2	0.2	60.2
Crane at 180ft	63.1	0.16	55.1
		Combined dBA Leq:	75.1

Unmitigated Construction Noise Impact

Combined Equipment Noise Level	75.1 dBA Leq
Existing Shielding	0 dBA
Ground Factor	0

Unmitigated Construction Noise Level	75.1 dBA Leq
Ambient Noise Level	65.7 dBA
New Noise Level	75.6 dBA Leq
Unmitigated Noise Increase	9.9 dBA

REVISED PROJECT

Mitigated

Equipment Noise Levels

Equipment	Noise Level - dBA		Total Shielding in dBA (Sound Barrier)	Workday Noise Level - dBA Leq
	Leq	Usage %		
Auger Drill at 110ft	80.7	0.2	-15.0	58.7
Skid Steer Loader at 110ft	65.6	0.2	-15.0	43.6
Concrete Mixer Truck at 95ft	75.5	0.2	-5.0	63.5
Pump at 95ft	67.2	0.2	-5.0	55.2
Crane at 180ft	63.1	0.16	-13.0	42.1
Combined dBA Leq:				65.3

Mitigated Construction Noise Impact

Combined Equipment Noise Level	65.3 dBA Leq
Ground Factor	0
Mitigated Construction Noise Level	65.3 dBA Leq
Ambient Noise Level	65.7 dBA
New Noise Level	68.5 dBA Leq
Mitigated Noise Increase	2.8 dBA

REVISED PROJECT

Construction Noise Impact Analysis

noah tanski environmental consulting

Beverly Park Senior Apartments - Upper Level: Auger-Cast Pile Installation

Ambient Noise Level:	65.7 dBA Leq
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Unmitigated

Equipment Noise Levels

Equipment	Noise Level - dBA		Workday Noise Level
	Leq	Usage %	- dBA Leq
Auger Drill at 110ft	80.7	0.2	73.7
Skid Steer Loader at 110ft	65.6	0.2	58.6
Concrete Mixer Truck at 95ft	75.5	0.2	68.5
Pump at 95ft	67.2	0.2	60.2
Crane at 180ft	63.1	0.16	55.1
		Combined dBA Leq:	75.1

Unmitigated Construction Noise Impact

Combined Equipment Noise Level	75.1 dBA Leq
Existing Shielding	0 dBA
Ground Factor	0

Unmitigated Construction Noise Level	75.1 dBA Leq
Ambient Noise Level	65.7 dBA
New Noise Level	75.6 dBA Leq
Unmitigated Noise Increase	9.9 dBA

REVISED PROJECT

Mitigated

Equipment Noise Levels

Equipment	Noise Level - dBA Leq	Usage %	Total Shielding in dBA (Sound Barrier)	Workday Noise Level - dBA Leq
Auger Drill at 110ft	80.7	0.2	-15.0	58.7
Skid Steer Loader at 110ft	65.6	0.2	-15.0	43.6
Concrete Mixer Truck at 95ft	75.5	0.2	-5.0	63.5
Pump at 95ft	67.2	0.2	-5.0	55.2
Crane at 180ft	63.1	0.16	0.0	55.1
Combined dBA Leq:				65.6

Mitigated Construction Noise Impact

Combined Equipment Noise Level	65.6 dBA Leq
Ground Factor	0
Mitigated Construction Noise Level	65.6 dBA Leq
Ambient Noise Level	65.7 dBA
New Noise Level	68.7 dBA Leq
Mitigated Noise Increase	3.0 dBA

REVISED PROJECT

Sound Barrier Analysis

noah tanski environmental consulting

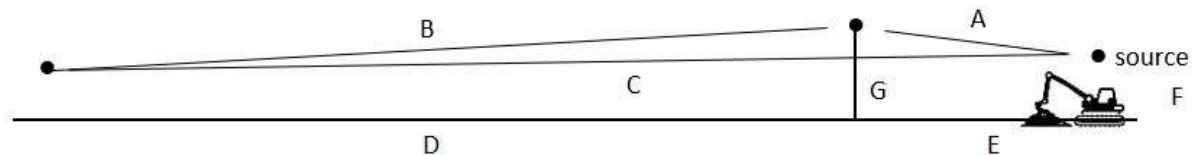
Beverly Park Senior Apartments: All Levels

Construction Phase: ACP Installation

Barrier Height: 7 feet

Receiver/Floor Height (ft)
-
-
-
40
35
25
15
5
-
-

D:	110 ft	F:	-8 ft
E:	See Below ft	G:	7 ft



Receiver/Floor Height (ft)	Equipment Noise Source to Barrier - "E" value (feet)							
	10	25	50	75	100	125	150	160
-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-
40	15.0	11.6	5.0	0.0	0.0	0.0	0.0	0.0
35	15.0	12.9	5.0	0.0	0.0	0.0	0.0	0.0
25	15.0	15.0	7.9	5.0	5.0	0.0	0.0	0.0
15	15.0	15.0	12.3	8.5	5.0	5.0	5.0	5.0
5	15.0	15.0	15.0	13.2	11.7	10.5	9.5	9.1
-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-

REVISED PROJECT

Construction Noise Impact Analysis

noah tanski environmental consulting

Beverly Park Senior Apartments - Ground Level: DSM Column Installation

Ambient Noise Level:	65.7 dBA Leq
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Unmitigated

Equipment Noise Levels

Equipment	Noise Level - dBA		Workday Noise Level
	Leq	Usage %	- dBA Leq
Auger Drill at 110ft	80.7	0.2	73.7
Loader at 110ft	65.6	0.2	58.6
Excavator at 110ft	69.1	0.2	62.1
Batch Plant at 230ft	73.3	0.15	65.1
Pump at 230ft	59.5	0.2	52.5
		Combined dBA Leq:	74.7

Unmitigated Construction Noise Impact

Combined Equipment Noise Level	74.7 dBA Leq
Existing Shielding	0 dBA
Ground Factor	0

Unmitigated Construction Noise Level	74.7 dBA Leq
Ambient Noise Level	65.7 dBA
New Noise Level	75.2 dBA Leq
Unmitigated Noise Increase	9.5 dBA

REVISED PROJECT

Mitigated

Equipment Noise Levels

Equipment	Noise Level - dBA		Total Shielding in dBA (Sound Barrier)	Workday Noise Level - dBA Leq
	Leq	Usage %		
Auger Drill at 110ft	80.7	0.2	-15.0	58.7
Loader at 110ft	65.6	0.2	-15.0	43.6
Excavator at 110ft	69.1	0.2	-15.0	47.1
Batch Plant at 230ft	73.3	0.15	-10.0	55.1
Pump at 230ft	59.5	0.2	-10.0	42.5
Combined dBA Leq:				60.6

Mitigated Construction Noise Impact

Combined Equipment Noise Level	60.6 dBA Leq
Ground Factor	0
Mitigated Construction Noise Level	60.6 dBA Leq
Ambient Noise Level	65.7 dBA
New Noise Level	66.9 dBA Leq
Mitigated Noise Increase	1.2 dBA

REVISED PROJECT

Construction Noise Impact Analysis

noah tanski environmental consulting

Beverly Park Senior Apartments - Upper Level: DSM Column Installation

Ambient Noise Level:	65.7 dBA Leq
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Unmitigated

Equipment Noise Levels

Equipment	Noise Level - dBA		Workday Noise Level
	Leq	Usage %	- dBA Leq
Auger Drill at 110ft	80.7	0.2	73.7
Loader at 110ft	65.6	0.2	58.6
Excavator at 110ft	69.1	0.2	62.1
Batch Plant at 230ft	73.3	0.15	65.1
Pump at 230ft	59.5	0.2	52.5
Combined dBA Leq:			74.7

Unmitigated Construction Noise Impact

Combined Equipment Noise Level	74.7 dBA Leq
Existing Shielding	0 dBA
Ground Factor	0
<hr/>	
Unmitigated Construction Noise Level	74.7 dBA Leq
Ambient Noise Level	65.7 dBA
New Noise Level	75.2 dBA Leq
Unmitigated Noise Increase	9.5 dBA

REVISED PROJECT

Mitigated

Equipment Noise Levels

Equipment	Noise Level - dBA		Total Shielding in dBA (Sound Barrier)	Workday Noise Level - dBA Leq
	Leq	Usage %		
Auger Drill at 110ft	80.7	0.2	-15.0	58.7
Loader at 110ft	65.6	0.2	-15.0	43.6
Excavator at 110ft	69.1	0.2	-15.0	47.1
Batch Plant at 230ft	73.3	0.15	0.0	65.1
Pump at 230ft	59.5	0.2	0.0	52.5
Combined dBA Leq:				66.2

Mitigated Construction Noise Impact

Combined Equipment Noise Level	66.2 dBA Leq
Ground Factor	0
Mitigated Construction Noise Level	66.2 dBA Leq
Ambient Noise Level	65.7 dBA
New Noise Level	69.0 dBA Leq
Mitigated Noise Increase	3.3 dBA

REVISED PROJECT

Sound Barrier Analysis

noah tanski environmental consulting

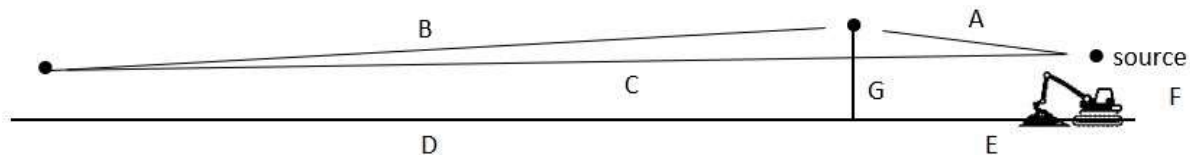
Beverly Park Senior Apartments: All Levels

Construction Phase: DSM Installation

Barrier Height: 7 feet

Receiver/Floor Height (ft)
-
-
-
40
35
25
15
5
-
-

D:	110 ft	F:	-8 ft
E:	See Below ft	G:	7 ft



Receiver/Floor Height (ft)	Equipment Noise Source to Barrier - "E" value (feet)							
	10	25	50	75	100	125	150	160
-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-
40	15.0	11.6	5.0	0.0	0.0	0.0	0.0	0.0
35	15.0	12.9	5.0	0.0	0.0	0.0	0.0	0.0
25	15.0	15.0	7.9	5.0	5.0	0.0	0.0	0.0
15	15.0	15.0	12.3	8.5	5.0	5.0	5.0	5.0
5	15.0	15.0	15.0	13.2	11.7	10.5	9.5	9.1
-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-

REVISED PROJECT

Vibration Impact Analysis

noah tanski environmental consulting

1050 La Cienega Project: On-Site Construction Vibration - PPV (in/sec)

Unmitigated

<u>Earthmoving Equipment</u>		
Equipment:	"Large Bulldozer" (or vibrational equivalent)	
Equipment PPV (in/sec):	0.089	
Reference Distance (ft):	25	
"n" value	1.1	
		Vibration Level
Receptor	Distance (ft)	(in/sec PPV)
South Alfred Street Residences	28	0.079

<u>Vibratory Compactor</u>		
Equipment:	"Vibratory Roller"	
Equipment PPV (in/sec):	0.21	
Reference Distance (ft):	25	
"n" value	1.1	
		Vibration Level
Receptor	Distance (ft)	(in/sec PPV)
South Alfred Street Residences	28	0.185

Mitigated

<u>Earthmoving Equipment</u>		
Equipment:	"Large Bulldozer" (or vibrational equivalent)	
Equipment PPV (in/sec):	0.089	
Reference Distance (ft):	25	
"n" value	1.1	
		Vibration Level
Receptor	Distance (ft)	(in/sec PPV)
South Alfred Street Residences	20	0.114
1080 La Cienega Blvd (Commercial)	6	0.428

<u>Earthmoving Equipment</u>		
Equipment:	"Small Bulldozer" (or vibrational equivalent)	
Equipment PPV (in/sec):	0.003	
Reference Distance (ft):	25	
"n" value	1.1	
		Vibration Level
Receptor	Distance (ft)	(in/sec PPV)
South Alfred Street Residences	1	0.103
1080 La Cienega Blvd (Commercial)	1	0.103

REVISED PROJECT

<u>Vibratory Compactor</u>		
Equipment:	"Vibratory Roller"	
Equipment PPV (in/sec):	0.21	
Reference Distance (ft):	25	
"n" value	1.1	
		Vibration Level
Receptor	Distance (ft)	(in/sec PPV)
South Alfred Street Residences	45	0.110
1080 La Cienega Blvd (Commercial)	15	0.368



DRAFT

MEMORANDUM

TO: Chris Joseph, Stacie Henderson, and Seth Wulkan, CAJA Environmental

FROM: Emily Wong, P.E.
Lauren Mullarkey-Williams

DATE: June 1, 2023

RE: Transportation Assessment for the
Revised 1050 La Cienega Project
Los Angeles, California

Ref: J1967

Gibson Transportation Consulting, Inc. (GTC) analyzed refinements to the 1050 La Cienega Project (Project) located at 1050 S. La Cienega Boulevard (Project Site) in the City of Los Angeles (City). The Project's land use program and site access and circulation have been refined since the approval of *1050 La Cienega Boulevard Project Sustainable Communities Environmental Assessment* (CAJA Environmental Services, LLC, August 2022) and *Transportation Assessment for the 1050 La Cienega Project* (GTC, June 2022) (Approved TAR), which was reviewed and approved by the Los Angeles Department of Transportation (LADOT) in *Transportation Assessment for the Proposed Mixed-Use Development Located at 1050 South La Cienega Boulevard (ENV-2022-2280-EAF/DIR-2022-2279-TOC-SPR-VHCA/PAR-2022-1142-TOC)* (LADOT, July 2022).

This memorandum summarizes our assessment and is consistent with the methodologies and base assumptions established by LADOT and previously used in the Approved TAR.

PROJECT DESCRIPTION

The Project as analyzed in the Approved TAR proposed a mixed-use development consisting of 290 apartment units, including 29 affordable units, and 7,500 square feet (sf) of commercial uses on a currently vacant Project Site. The Project was to include 426 vehicle parking spaces, as permissible by the Los Angeles Municipal Code (LAMC), within the one subterranean and three above-ground levels, and a total of 184 bicycle parking spaces, including 164 long-term spaces and 20 short-term spaces.

Vehicle access to the Project was proposed via one-way ingress at the southern driveway and one-way egress at the northern driveway. The Project was estimated to be complete in Year 2026.

REVISED PROJECT DESCRIPTION

The Project has since been refined to reduce the ground floor commercial uses to 5,260 sf, and consistent with the Approved TAR, the Revised Project would continue to provide 290 residential units (Revised Project).

The Revised Project would include 412 vehicle parking spaces and 180 bicycle parking spaces, including 160 long-term spaces and 18 short-term spaces, as permissible by the LAMC.

Vehicular access to the Project Site via La Cienega Boulevard has also been refined to provide one-way ingress at the northern driveway and one-way egress at the southern driveway. Bicycle and pedestrian access to the Project Site would continue to be provided separately from the vehicular driveways via commercial and residential entrances along La Cienega Boulevard, and the Revised Project proposes all passenger and commercial loading continue to remain on-site within the loading area on the ground level. The conceptual site plan for the Revised Project is illustrated in Figure 1.

CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) TRANSPORTATION ANALYSIS

The Approved TAR analyzed the Project for potential CEQA impacts under four categories, and it was found not to have a significant impact under any of the categories. The Approved TAR also concluded that the Project would not result in a freeway safety impact.

Threshold T-1 – Conflicting with Plans, Programs, Ordinances, or Policies Analysis

The Revised Project would not conflict with any adopted program, plan, ordinance, or policy, consistent with the Approved TAR. The Revised Project would continue to propose a mixed-use development within a Transit Priority Area. Furthermore, the Revised Project would continue to promote mobility options, including providing adequate bicycle parking and pedestrian amenities. Thus, the Revised Project would continue to be consistent with the Mobility Plan, Plan for a Healthy Los Angeles, Community Plans, and Citywide Design Guidelines. As such, the Revised Project would not result in any significant impacts related to Threshold T-1. Thus, the conclusions of the Approved TAR remain valid, and no further analysis would be required.

Threshold T-2.1 – Causing Substantial VMT Analysis

The Revised Project proposes a land use program similar to the Project analyzed in the Approved TAR, including the same residential density and a reduced commercial floor area. In addition, the Revised Project would continue to implement transportation demand management strategies as part of the Project design, including a reduced parking supply, unbundled parking, and bicycle parking in accordance with LAMC. As such, the Revised Project's household VMT per capita would be consistent with the Approved TAR. Furthermore, the commercial uses would continue to be less than 50,000 sf and, therefore, would be considered local-serving and the impact would be considered less than significant. Thus, the Threshold T-2.1 conclusions of the Revised Project would be consistent with the Approved TAR, and no further analysis would be required.

Threshold T-2.2. – Substantially Inducing Automobile Travel Analysis

Consistent with the analysis in the Transportation Assessment, the Revised Project is not a transportation project that would induce automobile travel. Therefore, no further evaluation is required.

Threshold T-3 – Substantially Increasing Hazards Due to a Geometric Design Feature or Incompatible Use Analysis

As previously detailed, the Revised Project would continue to provide vehicular access along La Cienega Boulevard via one ingress only driveway (northern driveway) and one egress only driveway (southern driveway). Pedestrian and bicycle access would also continue to be provided via separate commercial and residential entrances along La Cienega Boulevard.

The Revised Project would maintain safety and operations related to site access and circulation, as well as pedestrian and bicycle circulation. The vehicular driveways would continue to provide adequate sight distance, as La Cienega Boulevard has no curvatures and is relatively level adjacent to the Project Site. Furthermore, the Revised Project would maintain the two-way left-turn median along La Cienega Boulevard, which would facilitate safer left-turn ingress and egress to the Project Site. Consistent with the Approved TAR, the Revised Project would not increase the number of curb cuts along the Project frontage. Bicycle and pedestrian access to the Project Site would continue to be provided separately from the vehicular driveways via retail and residential entrances along La Cienega Boulevard.

Overall, consistent with the Approved TAR, the Revised Project would not modify roadway widths or otherwise affect the geometric design of roads surrounding the Project Site, nor would it implement any features that would obstruct sight distance or paths of vehicular, pedestrian, or bicycle travel. As such, the Revised Project would not result in any significant impacts related to Threshold T-3. Thus, the conclusions of the Approved TAR remain valid, and no further analysis or mitigation would be required.

Freeway Safety Analysis

As previously detailed, the Revised Project would reduce the commercial density and maintain the residential density as the Approved TAR. Thus, consistent with the Approved TAR, the Revised Project would not add 25 or more peak hour trips to any freeway off-ramp location, and no further freeway off-ramp queuing analysis is required. Furthermore, the Revised Project would not adversely affect safety on freeway facilities and no corrective measures at any freeway off-ramps would be required.

NON-CEQA TRANSPORTATION ANALYSIS

As previously detailed, the Revised Project includes a reduction in commercial density, and therefore, would generate fewer trips than what was analyzed in the Approved TAR. In addition,

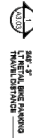
the Revised Project would maintain vehicular access along one ingress only driveway and one egress only driveway along La Cienega Boulevard. Therefore, the geographic distribution of trips of the Revised Project would not change.

Thus, the non-CEQA analysis of the Approved TAR is conservative, and the conclusions remain valid.

CONCLUSIONS

Consistent with the Approved TAR, the Revised Project would not conflict with the City's plans, programs, ordinances, and policies, and would not generate significant VMT or geometric design hazard impacts. In addition, the Revised Project would reduce the commercial density and, therefore, the non-CEQA operational analysis of the Approved TAR is conservative. Thus, the conclusions and findings of the Approved TAR remain valid.

LA CIENEGA BLVD



Source: RIOS, May, 2023.

PROJECT SITE PLAN

FIGURE
1

1050 La Cienega Boulevard Project Sustainable Communities Environmental Assessment

Comparison of SCAG’s RTP/SCS Program EIR Mitigation Measures, City of Los Angeles Housing Element Program EIR Mitigation Measures, and City of Los Angeles Mobility Plan 2035 EIR Mitigation Measures

On November 22, 2022, the City Council of Los Angeles adopted the sustainable communities environmental assessment (“SCEA”) prepared for the 1050 La Cienega Boulevard Project (“Project”), a proposed mixed-use residential and commercial development project containing 290 residential units and 7,500 square feet of restaurant commercial use in a 28-story, 297,600-square-foot building located at 1022-1066 S. La Cienega Boulevard (“Project Site”).

As required by Public Resources Code Section 21155.2(a), the SCEA identified mitigation measures contained in prior applicable environmental impact reports (“EIRs”). Specifically, the SCEA identified the mitigation measures contained in the Program EIR prepared by the Southern California Association of Governments (“SCAG”) in connection with SCAG’s adoption of the 2020-2045 Regional Transportation Plan (“RTP”) / Sustainable Communities Strategy (“SCS”), also known as “Connect SoCal 2020”, on September 3, 2020.¹ For each SCAG mitigation measure, the SCEA identified whether the measure was relevant and applicable to the Project, and if applicable, whether the Project would incorporate the SCAG mitigation measure or, alternately, incorporate another mitigation measure or regulatory compliance measure that was equal to or more effective than the SCAG mitigation measure.

During the City Council’s consideration of the SCEA, various public comments were submitted that alleged that the SCEA should identify mitigation measures from additional EIRs, including the City’s 2021-2029 Housing Element/Safety Element EIR,² the City’s Mobility Plan 2035 EIR,³ and the City’s 2001 Wilshire Community Plan Update EIR.⁴ As an initial matter, the Wilshire Community Plan Update EIR was prepared over twenty years ago, and any mitigation measures identified in that EIR would no longer be effective or relevant given the passage of two decades and the certification of more recent, applicable EIRs, including the Housing Element/Safety Element EIR and Mobility Plan 2035 EIR. As such, further consideration of the Wilshire Community Plan Update EIR’s mitigation measures is not needed or warranted.

1 An Addendum #1 to the Program EIR was approved by SCAG on September 3, 2020, and it contains the current mitigation measures for the Connect SoCal 2020 Program EIR. The Revised Mitigation Monitoring and Reporting Program containing the latest mitigation measures is available at: https://scag.ca.gov/sites/main/files/file-attachments/exhibit-a_connectsocial_peir_revisedmmp.pdf?1606004474

2 The City of Los Angeles (“City”) adopted an updated Housing Element of the General Plan on June 14, 2022. In connection with the Housing Element update, the City prepared and certified a Program EIR on November 24, 2021. An Addendum to the Program EIR was adopted on June 14, 2022. The Revised Mitigation Monitoring and Reporting Program containing the latest mitigation measures is available at <https://planning.lacity.org/development-services/eir/housing-element-2021-2029-update-safety-element-update-0>

3 The City adopted an updated Transportation Element of the General Plan (“Mobility Plan 2035” or “MP 2035”) on September 7, 2016. In connection with the Mobility Plan 2035, the City prepared and certified an EIR on August 11, 2015. Addenda to the EIR were adopted on January 28, 2016. The Mitigation & Monitoring Plan containing the Mobility Plan 2035 EIR Mitigation Measures is available at: <https://planning.lacity.org/development-services/eir/mobility-plan-2035>

4 The City adopted an updated Wilshire Community Plan on September 19, 2001. In connection with the Wilshire Community Plan, the City prepared and certified an EIR on September 19, 2001.

Regarding the Housing Element/Safety Element EIR and Mobility Plan 2035 EIR, the attached chart contains each EIR's mitigation measures. The Housing Element/Safety Element EIR's mitigation measures address Air Quality; Biological Resources; Cultural Resources; Geology and Soils; Hazards and Hazardous Materials; Hydrology and Water Quality; Public Services; Transportation; Noise; Tribal Cultural Resources; and Wildfire impacts. The Mobility Plan 2035 EIR's mitigation measures address Transportation, Parking, and Safety; Land Use and Planning; Noise and Vibration; and Biological Resources impacts. As shown by the chart, none of the potentially applicable mitigation measures in either City EIR propose any new requirements for the Project that have not already been incorporated into the Project through compliance with existing regulations or either SCAG or Project-specific mitigation measures. Accordingly, these City EIRs do not contain any new or different applicable mitigation obligations.

SCAG Connect SoCal 2024 Plan EIR Mitigation Measures	Los Angeles Housing Element Program EIR Mitigation Measures	Los Angeles Mobility Plan EIR Mitigation Measures	Consistency of 1050 La Cienega Project SCEA with Applicable Mitigation Measures
Aesthetics			
<p>PMM AES-1</p> <p>In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts to scenic vistas, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Use a palette of colors, textures, building materials that are graffiti-resistant, and/or plant materials that complement the surrounding landscape and development.</p> <p>b) Use contour grading to better match surrounding terrain. Contour edges of major cut-and-fill to provide a more natural looking finished profile.</p> <p>c) Design new corridor landscaping to respect existing natural and man-made features and to complement the dominant landscaping of the surrounding areas.</p> <p>d) Replace and renew landscaping along corridors with road widenings, interchange projects, and related improvements.</p>	<p>No applicable mitigation measure.</p>	<p>No applicable mitigation measure.</p>	<p>PRC Section 21099, enacted by Senate Bill 743, provides that “aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.” Consistent with SB 743, City of Los Angeles Zoning Information File ZI No. 2452 indicates that visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact shall not be considered a significant impact for infill projects within Transit Priority Areas (TPAs) pursuant to CEQA.</p> <p>The Project includes development of a mixed-use building with 290 dwelling units and 7,500 square feet of commercial restaurant use within multiple City-designated TPAs (including the D Line extension at Wilshire/La Cienega and the intersection of Pico Boulevard and La Cienega) and within a SCAG-designated High Quality Transit Area (HQTA). As such, the Project’s aesthetic impacts shall not be</p>

SCAG Connect SoCal 2024 Plan EIR Mitigation Measures	Los Angeles Housing Element Program EIR Mitigation Measures	Los Angeles Mobility Plan EIR Mitigation Measures	Consistency of 1050 La Cienega Project SCEA with Applicable Mitigation Measures
<p>e) Retain or replace trees bordering highways, so that clear-cutting is not evident.</p> <p>f) Provide new corridor landscaping that respects and provides appropriate transition to existing natural and man-made features and is complementary to the dominant landscaping or native habitats of surrounding areas.</p> <p>g) Reduce the visibility of construction staging areas by fencing and screening these areas with low contrast materials consistent with the surrounding environment, and by revegetating graded slopes and exposed earth surfaces at the earliest opportunity;</p> <p>h) Use see-through safety barrier designs (e.g. railings rather than walls)</p>			<p>considered significant impacts on the environment pursuant to PRC Section 21099. Thus, incorporation of mitigation measure into the Project is not required, and there are no applicable City mitigation measures to incorporate into the Project. Therefore, the SCEA is consistent with applicable prior mitigation measures regarding Aesthetics.</p>
<p>PMM AES-2</p> <p>In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts that substantially degrade visual character, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p>	<p>No applicable mitigation measure.</p>	<p>No applicable mitigation measure.</p>	<p>See comment above regarding consistency with applicable Aesthetics mitigation measures.</p>

SCAG Connect SoCal 2024 Plan EIR Mitigation Measures	Los Angeles Housing Element Program EIR Mitigation Measures	Los Angeles Mobility Plan EIR Mitigation Measures	Consistency of 1050 La Cienega Project SCEA with Applicable Mitigation Measures
<p>a) Minimize contrasts in scale and massing between the projects and surrounding natural forms and development, minimize their intrusion into important viewsheds, and use contour grading to better match surrounding terrain in accordance with county and city hillside ordinances, where applicable.</p> <p>b) Design landscaping along highway corridors to add significant natural elements and visual interest to soften the hard-edged, linear transportation corridors.</p> <p>c) Require development of design guidelines for projects that make elements of proposed buildings/facilities visually compatible or minimize visibility of changes in visual quality or character through use of hardscape and softscape solutions. Specific measures to be addressed include setback buffers, landscaping, color, texture, signage, and lighting criteria.</p> <p>d) Design projects consistent with design guidelines of applicable general plans.</p> <p>e) Require that sites are kept in a blight/nuisance-free condition. Remove blight or nuisances that compromise visual character or visual quality of project areas including graffiti abatement, trash removal, landscape</p>			

SCAG Connect SoCal 2024 Plan EIR Mitigation Measures	Los Angeles Housing Element Program EIR Mitigation Measures	Los Angeles Mobility Plan EIR Mitigation Measures	Consistency of 1050 La Cienega Project SCEA with Applicable Mitigation Measures
<p>management, maintenance of signage and billboards in good condition, and replace compromised native vegetation and landscape.</p> <p>f) Where sound walls are proposed, require sound wall construction and design methods that account for visual impacts as follows:</p> <ul style="list-style-type: none"> • use transparent panels to preserve views where sound walls would block views from residences; • use landscaped earth berm or a combination wall and berm to minimize the apparent sound wall height; • construct sound walls of materials whose color and texture complements the surrounding landscape and development; <p>g) Design sound walls to increase visual interest, reduce apparent height, and be visually compatible with the surrounding area; and landscape the sound walls with plants that screen the sound wall, preferably with either native vegetation or landscaping that complements the dominant landscaping of surrounding areas.</p>			

SCAG Connect SoCal 2024 Plan EIR Mitigation Measures	Los Angeles Housing Element Program EIR Mitigation Measures	Los Angeles Mobility Plan EIR Mitigation Measures	Consistency of 1050 La Cienega Project SCEA with Applicable Mitigation Measures
<p>PMM AES-3</p> <p>In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts that substantially degrade visual character, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Use lighting fixtures that are adequately shielded to a point below the light bulb and reflector and that prevent unnecessary glare onto adjacent properties. b) Restrict the operation of outdoor lighting for construction and operation activities to the hours of 7:00 a.m. to 10:00 p.m. or as otherwise required by applicable local rules or ordinances. c) Use high pressure sodium and/or cut-off fixtures instead of typical mercury-vapor fixtures for outdoor lighting. d) Use unidirectional lighting to avoid light trespass onto adjacent properties. e) Design exterior lighting to confine illumination to the project site, and/or to areas which do not include light-sensitive uses. 	<p>No applicable mitigation measure.</p>	<p>No applicable mitigation measure.</p>	<p>See comment above regarding consistency with applicable Aesthetics mitigation measures.</p>

SCAG Connect SoCal 2024 Plan EIR Mitigation Measures	Los Angeles Housing Element Program EIR Mitigation Measures	Los Angeles Mobility Plan EIR Mitigation Measures	Consistency of 1050 La Cienega Project SCEA with Applicable Mitigation Measures
<p>f) Provide structural and/or vegetative screening from light-sensitive uses.</p> <p>g) Shield and direct all new street and pedestrian lighting away from light-sensitive off-site uses.</p> <p>h) Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces.</p> <p>i) Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties.</p>			
Agriculture and Forestry			
<p>PMM AG-1</p> <p>In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to address potential adverse effects on agricultural resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Require project sponsors to mitigate for loss of farmland by providing permanent protection of in-kind farmland in the form of easements, fees, or</p>	<p>No applicable mitigation measure.</p>	<p>No applicable mitigation measure.</p>	<p>The SCEA concluded the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use. Thus, incorporation of SCAG's mitigation measure into the Project is not required, and there are no applicable City mitigation measures to incorporate into the Project. Therefore, the SCEA is consistent with SCAG's applicable mitigation</p>

SCAG Connect SoCal 2024 Plan EIR Mitigation Measures	Los Angeles Housing Element Program EIR Mitigation Measures	Los Angeles Mobility Plan EIR Mitigation Measures	Consistency of 1050 La Cienega Project SCEA with Applicable Mitigation Measures
<p>elimination of development rights/potential.</p> <p>b) Project relocation or corridor realignment to avoid Prime Farmland, Unique Farmland, or Farmland of Local or Statewide Importance.</p> <p>c) Maintain and expand agricultural land protections such as urban growth boundaries.</p> <p>d) Provide for mitigation fees to support a mitigation bank that invests in farmer education, agricultural infrastructure, water supply, marketing, etc. that enhance the commercial viability of retained agricultural lands.</p> <p>e) Minimize severance and fragmentation of agricultural land by constructing underpasses and overpasses at reasonable intervals to provide property access.</p> <p>f) Use berms, buffer zones, setbacks, and fencing to reduce conflicts between new development and farming uses and protect the functions of farmland.</p>			<p>measures regarding Agriculture and Forestry.</p>
<p>PMM AG-2</p> <p>Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects on Williamson Act contracts to</p>	<p>No applicable mitigation measure.</p>	<p>No applicable mitigation measure.</p>	<p>The Project Site is not zoned for agricultural use, and the site is not under Williamson Act contract. Therefore, the Project would not conflict with existing zoning for agricultural use, or a Williamson Act contract. Thus, incorporation of</p>

SCAG Connect SoCal 2024 Plan EIR Mitigation Measures	Los Angeles Housing Element Program EIR Mitigation Measures	Los Angeles Mobility Plan EIR Mitigation Measures	Consistency of 1050 La Cienega Project SCEA with Applicable Mitigation Measures
<p>the maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures:</p> <p>a) Project relocation or corridor realignment to avoid lands in Williamson Act contracts.</p> <p>b) Establish conservation easements consistent with the recommendations of the Department of Conservation, or 20-year Farmland Security Zone contracts (Government Code Section 51296 et seq.), 10-year Williamson Act contracts (Government Code Section 51200 et seq.), or use of other conservation tools available from the California Department of Conservation Division of Land Resource Protection.</p>			<p>SCAG's mitigation measures into the Project is not required, and there are no applicable City mitigation measures to incorporate into the Project. Therefore, the SCEA is consistent with SCAG's applicable mitigation measures regarding Agriculture and Forestry.</p>
<p>PMM AG-3</p> <p>Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland to maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures:</p>	<p>No applicable mitigation measure.</p>	<p>No applicable mitigation measure.</p>	<p>Neither the Project Site nor the surrounding area are zoned for forest land, timberland, or Timberland Production. As such, the Project would not result in any conflicts any zoning related to forest land, timberland, or Timberland Production zoning. The Project Site is located in an urbanized area of the City and has been developed in the recent past. Thus, incorporation of SCAG's mitigation measure into the Project is not required, and there are</p>

SCAG Connect SoCal 2024 Plan EIR Mitigation Measures	Los Angeles Housing Element Program EIR Mitigation Measures	Los Angeles Mobility Plan EIR Mitigation Measures	Consistency of 1050 La Cienega Project SCEA with Applicable Mitigation Measures
<p>a) Minimize construction related impacts to agricultural and forestry resources by locating materials and stationary equipment in such a way as to prevent conflict with agriculture and forestry resources.</p>			<p>no applicable City mitigation measures to incorporate into the Project. Therefore, the SCEA is consistent with SCAG's applicable mitigation measures regarding Agriculture and Forestry.</p>
<p>PMM AG-4: Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland, to the maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures:</p> <p>a) Design proposed projects to minimize, to the greatest extent feasible, the loss of the highest valued agricultural land.</p> <p>b) Redesign project features to minimize fragmenting or isolating Farmland. Where a project involves acquiring land or easements, ensure that the remaining non-project area is of a size sufficient to allow economically viable farming operations. The project proponents shall be responsible for acquiring easements, making lot line adjustments, and merging affected land parcels into units suitable for continued commercial agricultural management.</p>	<p>No applicable mitigation measure.</p>	<p>No applicable mitigation measure.</p>	<p>Because the Project Site is currently not used for any agricultural uses and is not forest land, no agricultural use or forest land would be converted. The Project Site is located in an urbanized area of the City and has been developed in the recent past. Thus, incorporation of SCAG's mitigation measure into the Project is not required, and there are no applicable City mitigation measures to incorporate into the Project. Therefore, the SCEA is consistent with SCAG's applicable mitigation measures regarding Agriculture and Forestry.</p>

SCAG Connect SoCal 2024 Plan EIR Mitigation Measures	Los Angeles Housing Element Program EIR Mitigation Measures	Los Angeles Mobility Plan EIR Mitigation Measures	Consistency of 1050 La Cienega Project SCEA with Applicable Mitigation Measures
<p>c) Reconnect utilities or infrastructure that serve agricultural uses if these are disturbed by project construction. If a project temporarily or permanently cuts off roadway access or removes utility lines, irrigation features, or other infrastructure, the project proponents shall be responsible for restoring access as necessary to ensure that economically viable farming operations are not interrupted.</p>			
<p>PMM AG-5</p> <p>Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland, to the maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures:</p> <p>a) Manage project operations to minimize the introduction of invasive species or weeds that may affect agricultural production on adjacent agricultural land. Where a project has the potential to introduce sensitive species or habitats or have other spill-over effects on nearby agricultural lands, the project proponents shall be</p>	<p>No applicable mitigation measure.</p>	<p>No applicable mitigation measure.</p>	<p>Because the Project Site is currently not used for any agricultural uses and is not forest land, no agricultural use or forest land would be converted. The Project Site is located in an urbanized area of the City and has been developed in the recent past. Thus, incorporation of SCAG's mitigation measure into the Project is not required, and there are no applicable City mitigation measures to incorporate into the Project. Therefore, the SCEA is consistent with SCAG's applicable mitigation measures regarding Agriculture and Forestry.</p>

SCAG Connect SoCal 2024 Plan EIR Mitigation Measures	Los Angeles Housing Element Program EIR Mitigation Measures	Los Angeles Mobility Plan EIR Mitigation Measures	Consistency of 1050 La Cienega Project SCEA with Applicable Mitigation Measures
<p>responsible for acquiring easements on nearby agricultural land and/or financially compensating for indirect effects on nearby agricultural land. Easements (e.g., flowage easements) shall be required for temporary or intermittent interruption in farming activities (e.g., because of seasonal flooding or groundwater seepage). Acquisition or compensation would be required for permanent or significant loss of economically viable operations.</p>			
Air Quality			
<p>PMM AQ-1</p> <p>In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to violating air quality standards. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ol style="list-style-type: none"> a) Minimize land disturbance. b) Suspend grading and earth moving when wind gusts exceed 25 miles per hour unless the soil is wet enough to prevent dust plumes. c) Cover trucks when hauling dirt. 	<p>4.2-2(a) Construction Emissions Reduction</p> <p>For discretionary projects that meet the following criteria, prior to project approval, the Applicant shall be required to provide to the City an Air Quality Impact Analysis prepared by a qualified air quality analyst to analyze construction emissions and identify necessary mitigation:</p> <ul style="list-style-type: none"> • Demolition of more than 13,500 square feet of building area; • Greater than 5,000 cubic yards of soil cut/fill; 	<p>No applicable mitigation measure.</p>	<p>As described in the SCEA, Air Quality Technical Modeling was prepared for the Project by a qualified air quality analyst. This modeling analyzed both the construction-related and operational emissions for the Project (see Appendix B-1 of the SCEA). As shown on SCEA Table III-4, the Project's maximum daily regional construction emissions would not exceed SCAQMD regional significance thresholds for VOC, NO_x, CO, SO_x, PM₁₀, or PM_{2.5}. Local emissions also would not exceed SCAQMD LSTs for NO_x, CO, PM₁₀, or PM_{2.5}. Therefore, the Project's construction-related emissions</p>

SCAG Connect SoCal 2024 Plan EIR Mitigation Measures	Los Angeles Housing Element Program EIR Mitigation Measures	Los Angeles Mobility Plan EIR Mitigation Measures	Consistency of 1050 La Cienega Project SCEA with Applicable Mitigation Measures
<p>d) Stabilize the surface of dirt piles if not removed immediately.</p> <p>e) Limit vehicular paths on unpaved surfaces and stabilize any temporary roads.</p> <p>f) Minimize unnecessary vehicular and machinery activities.</p> <p>g) Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway.</p> <p>h) Revegetate disturbed land, including vehicular paths created during construction to avoid future off-road vehicular activities.</p> <p>i) On Caltrans projects, Caltrans Standard Specifications 10-Dust Control, 17-Watering, and 18-Dust Palliative shall be incorporated into project specifications.</p> <p>j) Require contractors to assemble a comprehensive inventory list (i.e., make, model, engine year, horsepower, emission rates) of all heavy-duty off-road (portable and mobile) equipment (50 horsepower and greater) that could be used an aggregate of 40 or more hours for the construction project. Prepare a plan for approval by the applicable air district demonstrating achievement of the applicable percent reduction for a CARB-approved fleet. Daily logging of</p>	<ul style="list-style-type: none"> • Greater than 5-acres of graded area; or use of more than ten pieces of heavy-duty construction equipment and 150 truck trips (or a total of 6,000 vehicle miles traveled by truck) on any given day during demolition, site clearing, or grading. <p>The Air Quality Impact Analysis shall demonstrate that project emissions are less than applicable SCAQMD regional and LST thresholds, and as applicable may include, but are not limited to, the following mitigation:</p> <ul style="list-style-type: none"> • Off-road diesel-powered construction equipment greater than 50 horsepower shall be certified for either the Tier 4 Final emission standards for CARB In-Use Off-Road Diesel-Fueled Fleets Regulations or the USEPA Tier 4 		<p>impacts on regional and localized air quality would be less than significant, and no mitigation is required. As shown on SCEA Table III-5, the Project's maximum daily operational emissions would not exceed SCAQMD's regional significance thresholds for VOC, NO_x, CO, PM₁₀, and PM_{2.5}, nor would the Project's maximum emissions exceed SCAQMD LSTs for NO_x, CO, PM₁₀, or PM_{2.5}. Therefore, the Project's operational-related emissions impacts on regional and localized air quality would be less than significant, and no mitigation is required. No significant impacts related to this issue have been identified, and no mitigation measures are required. Thus, the SCEA is consistent with SCAG's applicable mitigation measures regarding Air Quality. Moreover, the preparation of Air Quality Technical Modeling for the Project is consistent with the recommendations of City Mitigation Measure 4.2-2(a), and as contemplated by that measure, no mitigation is to be required for projects that do not exceed applicable emissions thresholds.</p>

SCAG Connect SoCal 2024 Plan EIR Mitigation Measures	Los Angeles Housing Element Program EIR Mitigation Measures	Los Angeles Mobility Plan EIR Mitigation Measures	Consistency of 1050 La Cienega Project SCEA with Applicable Mitigation Measures
<p>the operating hours of the equipment should also be required.</p> <p>k) Ensure that all construction equipment is properly tuned and maintained.</p> <p>l) Minimize idling time to 5 minutes or beyond regulatory requirements—saves fuel and reduces emissions.</p> <p>m) Provide an operational water truck on-site at all times. Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas. Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway.</p> <p>n) Utilize existing power sources (e.g., power poles) or clean fuel generators rather than temporary power generators.</p> <p>o) Develop a traffic plan to minimize community impacts as a result of traffic flow interference from construction activities. The plan may include advance public notice of routing, use of public transportation, and satellite parking areas with a shuttle service. Schedule operations affecting traffic for off-peak hours. Minimize obstruction of through-traffic lanes. Provide a flag person to guide traffic properly and ensure safety at construction sites. Project sponsors should consider developing a goal for the minimization of community impacts.</p>	<p>emission standards, where available. In the event that Tier 4 engines are not available for any off-road equipment larger than 100 horsepower, that equipment shall be equipped with a Tier 3 engine or an engine that is equipped with retrofit controls to reduce exhaust emissions of NOX and DPM to no more than Tier 3 levels unless certified by engine manufacturers or the onsite air quality construction mitigation manager that the use of such devices is not practical for specific engine types.</p> <ul style="list-style-type: none"> All construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions 		<p>Accordingly, no relevant mitigation from SCAG or the City need be incorporated into the Project.</p>

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<p>p) As appropriate require that portable engines and portable engine-driven equipment units used at the project work site, with the exception of on-road and off-road motor vehicles, obtain CARB Portable Equipment Registration with the state or a local district permit. Arrange appropriate consultations with the CARB or the District to determine registration and permitting requirements prior to equipment operation at the site.</p> <p>q) Require projects to use Tier 4 Final equipment or better for all engines above 50 horsepower (hp). In the event that construction equipment cannot meet to Tier 4 Final engine certification, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is approved by SCAG before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, construction equipment with Tier 4 Interim or reduction in the number and/or horsepower rating of construction equipment and/or limiting the number of construction equipment operating at the same time. All equipment must be tuned and maintained in compliance with the manufacturer's recommended</p>	<p>reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. At the time of mobilization of each applicable unit of equipment, a copy of each unit's certified tier specification, BACT documentation, and ARB or SCAQMD operating permit shall be provided.</p> <ul style="list-style-type: none"> • Vehicle idling shall be limited to five minutes as set forth in the California Code of Regulations, Title 13. Signs shall be posted in areas where they will be seen by vehicle operators stating idling time limits. • Heavy duty diesel-fueled equipment shall use low NOx diesel fuel to the extent that it 		

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<p>maintenance schedule and specifications. All maintenance records for each equipment and their contractor(s) should make available for inspection and remain on-site for a period of at least two years from completion of construction, unless the individual project can demonstrate that Tier 4 engines would not be required to mitigate emissions below significance thresholds. Project sponsors should also consider including ZE/ZNE technologies where appropriate and feasible.</p> <p>r) Projects located within the South Coast Air Basin should consider applying for South Coast AQMD “SOON” funds which provides funds to applicable fleets for the purchase of commercially available low-emission heavy-duty engines to achieve near-term reduction of NOx emissions from in-use off-road diesel vehicles.</p> <p>s) Projects located within AB 617 communities should review the applicable Community Emissions Reduction Plan (CERP) for additional mitigation that can be applied to individual projects.</p> <p>t) Where applicable, projects should provide information about air quality related programs to schools, including the Environmental Justice Community</p>	<p>is available and feasible to use.</p> <ul style="list-style-type: none"> • Construction haul truck operators for demolition debris and import/export of soil shall use trucks that meet the California Air Resources Board’s (CARB) 2010 engine emissions standards at 0.01 grams per brake horsepower-hour of PM and 0.20 grams per brake horsepower-hour of NOx emissions. Operators shall maintain records of all trucks associated with project construction to document that each truck used meets these emission standards and shall make these records available for inspection upon request by the City of Los Angeles or the South Coast Air Quality Management District (SCAQMD). 		

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<p>Partnerships (EJCP), Clean Air Ranger Education (CARE), and Why Air Quality Matters programs.</p> <p>u) Projects should work with local cities and counties to install adequate signage that prohibits truck idling in certain locations (e.g., near schools and sensitive receptors).</p> <p>v) As applicable for airport projects, the following measures should be considered:</p> <ul style="list-style-type: none"> a. Considering operational improvements to reduce taxi time and auxiliary power unit usage, where feasible. Additionally, consider single engine taxing, if feasible as allowed per Federal Aviation Administration guidelines. b. Set goals to achieve a reduction in emissions from aircraft operations over the lifetime of the proposed project. c. Require the use of ground service equipment (GSE) that can operate on battery-power. If electric equipment cannot be obtained, require the use of alternative fuel, the cleanest gasoline equipment, or Tier 4, at a minimum. 	<ul style="list-style-type: none"> • Construction contractors shall utilize construction equipment that uses low polluting fuels (i.e., compressed natural gas, liquid petroleum gas, and unleaded gasoline) to the extent that they are available and feasible to use. • Equipment such as tower cranes and signal boards shall be electric or alternative fueled (i.e., non-diesel). Pole power shall be made available for use for electric tools, equipment, lighting, etc. Construction equipment such as tower cranes and signal boards shall utilize electricity from power poles or alternative fuels (i.e., non-diesel), rather than diesel power generators and/or gasoline power 		

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<p>w) As applicable for port projects, the following measures should be considered:</p> <ul style="list-style-type: none"> a. Develop specific timelines for transitioning to zero emission cargo handling equipment (CHE). b. Develop interim performance standards with a minimum amount of CHE replacement each year to ensure adequate progress. c. Use short side electric power for ships, which may include tugboats and other ocean-going vessels or develop incentives to gradually ramp up the usage of shore power. d. Install the appropriate infrastructure to provide shore power to operate the ships. Electrical hookups should be appropriately sized. e. Maximize participation in the Port of Los Angeles' Vessel Speed Reduction Program or the Port of Long Beach's Green Flag Initiation Program in order to reduce the speed of vessel transiting within 40 nautical miles of Point Fermin. 	<p>generators. If stationary construction equipment, such as diesel- or gasoline-powered generators, must be operated continuously, such equipment shall be located at least 100 feet from sensitive land uses (e.g., residences, schools, childcare centers, hospitals, parks, or similar uses), whenever possible.</p> <ul style="list-style-type: none"> • Alternative-fueled generators shall be used when commercial models that have the power supply requirements to meet the construction needs of the Project are commercially available from local suppliers/vendors. The determination of commercial availability of such equipment will be made by the City prior to issuance of grading or building 		

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<p>f. Encourage the participation in the Green Ship Incentives.</p> <p>g. Offer incentives to encourage the use of on-dock rail.</p> <p>x) As applicable for rail projects, the following measures should be considered:</p> <p>a. Provide the highest incentives for electric locomotives and then locomotives that meet Tier 5 emission standards with a floor on the incentives for locomotives that meet Tier 4 emission standards.</p> <p>y) Projects that will introduce sensitive receptors within 500 feet of freeways and other sources should consider installing high efficiency of enhanced filtration units, such as Minimum Efficiency Reporting Value (MERV) 13 or better. Installation of enhanced filtration units can be verified during occupancy inspection prior to the issuance of an occupancy permit.</p> <p>z) Develop an ongoing monitoring, inspection, and maintenance program for the MERV filters.</p> <p>a. Disclose potential health impacts to prospective sensitive receptors from living in close proximity to freeways or other sources of air pollution and the</p>	<p>permits based on applicant provided evidence of the availability or unavailability of alternative-fueled generators and/or evidence obtained by the City from expert sources such as construction contractors in the region.</p> <ul style="list-style-type: none"> • Consistent with SCAQMD Rule 403, construction contractors shall identify and implement best available dust control measures during active construction operations capable of generating dust. • Construction contractors shall maintain construction equipment in good, properly tuned operating condition, as specified by the manufacturer, to 		

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<p>reduced effectiveness of air filtration systems when windows are open or residents are outside.</p> <p>b. Identify the responsible implementing and enforcement agency to ensure that enhanced filtration units are installed on-site before a permit of occupancy is issued.</p> <p>c. Disclose the potential increase in energy costs for running the HVAC system to prospective residents.</p> <p>d. Provide information to residents on where MERV filters can be purchased.</p> <p>e. Provide recommended schedule (e.g., every year or every six months) for replacing the enhanced filtration units.</p> <p>f. Identify the responsible entity such as future residents themselves, Homeowner's Association, or property managers for ensuring enhanced filtration units are replaced on time.</p> <p>g. Identify, provide, and disclose ongoing cost-sharing strategies, if any, for replacing the enhanced filtration units.</p>	<p>minimize exhaust emissions.</p> <p>Documentation demonstrating that the equipment has been maintained in accordance with the manufacturer's specifications shall be kept on-site and made available to LADBS inspectors during inspection.</p> <ul style="list-style-type: none"> • Construction contractors shall reroute construction trucks away from congested streets or sensitive receptor areas, as feasible. • Construction activities shall be discontinued during second-stage smog alerts (when feasible). A record of any second-stage smog alerts and of discontinued construction activities as applicable shall be maintained by the Contractor on-site. If 		

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<p>h. Set criteria for assessing progress in installing and replacing the enhanced filtration units; and</p> <p>i. Develop a process for evaluating the effectiveness of the enhanced filtration units.</p> <p>aa) Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities</p> <p>bb) The following criteria related to diesel emissions shall be implemented on by individual project sponsors as appropriate and feasible:</p> <ul style="list-style-type: none"> • Diesel nonroad vehicles on site for more than 10 total days shall have either (1) engines that meet EPA on road emissions standards or (2) emission control technology verified by EPA or CARB to reduce PM emissions by a minimum of 85%. • Diesel generators on site for more than 10 total days shall be equipped with emission control technology verified by EPA or CARB to reduce PM emissions by a minimum of 85%. • Nonroad diesel engines on site shall be Tier 2 or higher. 	<p>infeasible to stop work, i.e., in the instance of a continuous concrete pour, construction activities shall be limited to those activities necessary to complete the immediate job.</p> <ul style="list-style-type: none"> • For projects where continuous pour activities will extend past the typical construction day: <ul style="list-style-type: none"> ○ Concrete trucks shall have an average capacity of 10 cubic yards to minimize the number of concrete truck trips. ○ Contractor shall use local concrete suppliers with 90 percent or more of the concrete supplied by 		

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<ul style="list-style-type: none"> • Diesel nonroad construction equipment on site for more than 10 total days shall have either (1) engines meeting EPA Tier 4 nonroad emissions standards or (2) emission control technology verified by EPA or CARB for use with nonroad engines to reduce PM emissions by a minimum of 85% for engines for 50 hp and greater and by a minimum of 20% for engines less than 50 hp. • Emission control technology shall be operated, maintained, and serviced as recommended by the emission control technology manufacturer. • Diesel vehicles, construction equipment, and generators on site shall be fueled with ultra-low sulfur diesel fuel (ULSD) or a biodiesel blend approved by the original engine manufacturer with sulfur content of 15 ppm or less. • The construction contractor shall maintain a list of all diesel vehicles, construction equipment, and generators to be used on site. The list shall include the following: 	<p>one or more facilities within a driving distance of less than 5 miles per one-way trip or 10 miles round trip where feasible.</p> <ul style="list-style-type: none"> ○ Contractor shall be required to use alternatively fueled concrete trucks that achieve the same or lower NOx emissions as CNG-fueled concrete trucks to the extent feasible. The level of feasibility/infeasibility shall be approved by the City 		

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<p>i. Contractor and subcontractor name and address, plus contact person responsible for the vehicles or equipment.</p> <p>ii. Equipment type, equipment manufacturer, equipment serial number, engine manufacturer, engine model year, engine certification (Tier rating), horsepower, engine serial number, and expected fuel usage and hours of operation.</p> <p>iii. For the emission control technology installed: technology type, serial number, make, model, manufacturer, EPA/CARB verification number/level, and installation date and hour-meter reading on installation date.</p> <ul style="list-style-type: none"> The contractor shall establish generator sites and truck- 	<p>prior to the beginning of concrete pouring activities.</p> <ul style="list-style-type: none"> During plan check, applicant shall make available to SCAQMD a comprehensive inventory of all of road trucks and concrete trucks to be used for the project, including horsepower rating, engine production year, and certification of the specified equipment. <p>4.2-2(b) Operations Emissions Reduction</p> <p>For discretionary projects, prior to project approval, the Applicant shall be required to provide the City an Air Quality Impact Analysis prepared by a qualified air quality analyst to analyze operational emissions and identify necessary mitigation for any discretionary project that would include more than 462 single-family</p>		

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<p>staging zones for vehicles waiting to load or unload material on site. Such zones shall be located where diesel emissions have the least impact on abutters, the general public, and especially sensitive receptors such as hospitals, schools, daycare facilities, elderly housing, and convalescent facilities.</p> <ul style="list-style-type: none"> • The contractor shall maintain a monthly report that, for each on road diesel vehicle, nonroad construction equipment, or generator onsite, includes: <ul style="list-style-type: none"> i. Hour-meter readings on arrival on-site, the first and last day of every month, and on off-site date. ii. Any problems with the equipment or emission controls. iii. Certified copies of fuel deliveries for the time period that identify: <ol style="list-style-type: none"> 1. Source of supply 2. Quantity of fuel 3. Quantity of fuel, including sulfur content (percent by weight) 	<p>residential units, 612 multi-family residential units, or any equivalent combination thereof. The Air Quality Impact Analysis shall demonstrate that project emissions are less than applicable SCAQMD regional and LST thresholds, and as applicable may include, but are not limited to, the following mitigation:</p> <ul style="list-style-type: none"> • Implementation of a Transportation Demand Management Plan. <ul style="list-style-type: none"> ○ Installation of additional electric vehicle charging stations ○ Public infrastructure improvements (e.g., bus stop shelter improvements) ○ Carpool or ridesharing programs 		

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<p>cc) Project should exceed Title-24 Building Envelope Energy Efficiency Standards (California Building Standards Code). The following measures can be used to increase energy efficiency:</p> <ul style="list-style-type: none"> • Install programmable thermostat timers • Obtain Third-party HVAC commissioning and verification of energy savings (to be grouped with exceedance of Title 24). • Install energy efficient appliances (Typical reductions for energy-efficient appliances can be found in the Energy Star and Other Climate Protection Partnerships Annual Reports.) • Install higher efficacy public street and area lighting • Limit outdoor lighting requirements • Replace traffic lights with LED traffic lights • Establish onsite renewable or carbon neutral energy systems – generic, solar power and wind power • Utilize a combined heat and power system 	<ul style="list-style-type: none"> ○ Subsidized transit costs ○ Unbundled parking costs ○ Bicycle amenities (storage, showers, lockers, etc.) • Use of all-electric appliances (i.e., elimination of natural gas service). • Use solar or low emission water heaters that exceed Title 24 requirements. • Increased walls and attic insulation beyond Title 24 requirements. • Property management plan that obligates property manager to use of low-VOC paints and coatings, meeting SCAQMD standards, for property management and required use of electric yard and landscaping equipment, including lawnmowers, leaf- 		

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<ul style="list-style-type: none"> • Establish methane recovery in Landfills and Wastewater Treatment Plants. • Locate project near bike path/bike lane • Provide pedestrian network improvements, such as interconnected street network, narrower roadways and shorter block lengths, sidewalks, accessibility to transit and transit shelters, traffic calming measures, parks and public spaces, minimize pedestrian barriers. • Provide traffic calming measures, such as: <ul style="list-style-type: none"> i. Marked crosswalks ii. Count-down signal timers iii. Curb extensions iv. Speed tables v. Raised crosswalks vi. Raised intersections vii. Median islands viii. Tight corner radii ix. Roundabouts or mini-circles x. On-street parking xi. Chicanes/chokers • Create urban non-motorized zones 	<p>blowers, and chainsaws.</p>		

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<ul style="list-style-type: none"> • Provide bike parking in non-residential and multi-unit residential projects • Dedicate land for bike trails • Limit parking supply through: <ul style="list-style-type: none"> i. Elimination (or reduction) of minimum parking requirements ii. Creation of maximum parking requirements iii. Provision of shared parking • Require residential area parking permit. • Provide ride-sharing programs <ul style="list-style-type: none"> i. Designate a certain percentage of parking spacing for ride sharing vehicles ii. Designating adequate passenger loading and unloading and waiting areas for ride-sharing vehicles iii. Providing a web site or messaging board for coordinating rides iv. Permanent transportation management association 			

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membership and finding requirement.			
No applicable mitigation measure.	<p>4.2-3 Construction TAC Reduction Measures</p> <p>For discretionary projects with an anticipated construction duration of greater than 18-months and located within 500 feet of a residence or other sensitive receptor, prior to issuance of a permit to construct, the applicant shall provide to the City an Air Quality Impact Analysis, prepared by a qualified air quality analyst, that includes a construction health risk assessment. If the analysis shows incremental cancer risk would exceed 10 persons in one million at a sensitive receptor or the calculated Hazard Index for chronic or acute risks would exceed a value of 1.0 at a sensitive receptor, the air quality analyst shall prepare a mitigation plan subject to City review and approval that reduce TACs to less than SCAQMD thresholds. The applicant shall comply with</p>	No applicable mitigation measure.	As described above and in the SCEA, Air Quality Technical Modeling was prepared for the Project that analyzed the construction-related emissions for the Project (see Appendix B-1 of the SCEA), and that concluded that no exceedance of applicable emissions thresholds would occur. Furthermore, as described in the SCEA and consistent with City Mitigation Measure 4.2-3, a construction health risk assessment (HRA) was conducted, for informational purposes, to quantify the impact of diesel particulate matter (DPM) emitted during Project construction. The HRA quantified both carcinogenic risks and noncarcinogenic hazards for the maximum exposed sensitive receptors adjoining the Project Site. Results of the HRA showed carcinogenic risk and noncarcinogenic hazard estimates for the maximum exposed sensitive receptors did not exceed identified significance thresholds; therefore, no mitigation plan is necessary.

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	<p>all mitigation measures in the mitigation plan.</p> <p>Alternatively, no Air Quality Impact Analysis, health risk assessment, and mitigation plan shall be required for discretionary projects conditioned to use construction equipment that meets the CARB Tier 4 Final or USEPA Tier 4 off-road emissions for all equipment rated 50 horsepower or greater. A copy of each unit's certified tier specification or model year specification and CARB or SCAQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment.</p>		<p>Thus, the SCEA is consistent with applicable SCAG and City mitigation measures regarding Air Quality, and incorporation of the City's mitigation measure into the Project is not required.</p>
Biological Resources			
<p>PMM BIO-1</p> <p>In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to threatened and</p>	<p>4.3-1(a) Biological Resources Reconnaissance Survey and Reporting</p> <p>For all discretionary projects that require vegetation removal, ground disturbance, staging of vehicles, equipment, or materials, and access routes on natural (e.g., native, virgin)</p>	<p>B1</p> <p><i>Special-Status Species and Habitat.</i> For future enhancements occurring within 200 feet of a Significant Ecological Area designated by the County of Los Angeles or within 200 feet of areas containing native vegetation,</p>	<p>As described in the SCEA, the Project Site is located in an urbanized and developed area of the City and has been fully developed in the recent past. Specifically, the Project Site has been subject to substantial disturbance associated with the original construction of buildings that used to be on the site,</p>

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<p>endangered species, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Require project design to avoid occupied habitat, potentially suitable habitat, and designated critical habitat, wherever practicable and feasible.</p> <p>b) Where avoidance is determined to be infeasible, provide conservation measures to fulfill the requirements of the applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal ESA, Section 2081 of the California ESA to support issuance of an incidental take permit, and/or as identified in local or regional plans. Conservation strategies to protect the survival and recovery of federally and state-listed endangered and local special status species may include:</p> <ul style="list-style-type: none"> i. Impact minimization strategies ii. Contribution of in-lieu fees for in-kind conservation and mitigation efforts iii. Use of in-kind mitigation bank credits iv. Funding of research and recovery efforts v. Habitat restoration vi. Establishment of conservation easements 	<p>or disturbed but undeveloped (e.g., unpaved, areas barren, or ruderal), areas that contain or have the potential to support special-status species, sensitive habitat, or within 300 feet of suitable habitat to support special-status species (e.g., nesting passerines) as determined by the Department of City Planning, including through consultation with CDFW, the project applicant shall be required to conduct a biological resources assessment report to characterize the biological resources on-site and to determine the presence or absence of sensitive species. The report shall identify 1) approximate population size and distribution of any sensitive plant or animal species, 2) any sensitive habitats (such as wetlands or riparian areas), and 3) any potential impacts of Proposed Project on wildlife corridors.</p> <p>Off-site areas that may be directly or indirectly affected by</p>	<p>such as open space and undeveloped areas, a project-specific biological resource survey and assessment shall be conducted and prepared that discloses any potential impacts to special status species and habitats, and mitigates, to the extent feasible, the impacts of the mobility improvements. In addition, prior to implementation of mobility improvements, all required permits must be obtained; permits for work in wetland and riparian habitats frequently require project-specific measures to preserve resources.</p>	<p>as well as their subsequent demolition, and nearby surrounding areas are entirely developed. As such, the Project Site does not have potential to support special-status species or sensitive habitat, nor has the site been identified as a Significant Ecological Area or any other designated habitat area by the County of Los Angeles or any other governmental body or agency. Accordingly, no mitigation measures pertaining to on-site sensitive habitat identified by either SCAG or the City are relevant to the Project.</p> <p>No trees are located on the Project Site, and the four street trees located along La Cienega adjacent to the Project Site, some or all of which could be removed as part of the Project, are not considered a “protected tree,” as defined by the City. However, as described in the SCEA, these trees could potentially provide nesting sites for migratory birds. As further described in the SCEA, the Project would be required to comply with the Migratory Bird Treaty Act (MBTA) (Title 33, United States Code, Section 703 et seq., see also Title 50, Code of Federal</p>

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<p>vii. Permanent dedication of in-kind habitat</p> <p>c) Design projects to avoid desert native plants protected under the California Desert Native Plants Act, salvage and relocate desert native plants, and/or pay in lieu fees to support off-site long-term conservation strategies.</p> <p>d) Temporary access roads and staging areas will not be located within areas containing sensitive plants, wildlife species or native habitat wherever feasible, so as to avoid or minimize impacts to these species.</p> <p>e) Develop and implement a Worker Environmental Awareness Program (environmental education) to inform project workers of their responsibilities to avoid and minimize impacts on sensitive biological resources.</p> <p>f) Retain a qualified botanist to document the presence or absence of special status plants before project implementation.</p> <p>g) Appoint a qualified biologist to monitor construction activities that may occur in or adjacent to occupied sensitive species' habitat to facilitate avoidance of resources not permitted for impact.</p> <p>h) Appoint a qualified biologist to monitor implementation of mitigation measures.</p>	<p>the individual project shall also be surveyed. The report shall include site location, literature sources, methodology, timing of surveys, vegetation map, site photographs, and descriptions of on-site biological resources (e.g., observed and detected species, as well as an analysis of those species with the potential to occur on-site). The biological resources assessment report and surveys shall be conducted by a qualified biologist, and any special status species surveys shall be conducted according to standard methods of surveying for the species as appropriate.</p> <p>If sensitive species and/or habitat are absent from the individual project site and adjacent lands potentially affected by the individual project, a written report substantiating such shall be submitted to Department of City Planning (DCP) prior to project approval, and the</p>		<p>Regulation, Part 10) and Section 3503 of the California Department of Fish and Wildlife Code, which regulate vegetation removal during the nesting season to ensure that significant impacts to migratory birds would not occur. These existing regulations regarding nesting birds are reflected in the mitigation measures identified by SCAG and the City; accordingly, the Project's compliance with these regulatory requirements would be consistent with the relevant portions of these mitigation measures, and therefore, incorporation of these SCAG and City mitigation measures into the Project is not required.</p>

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<p>i) Schedule construction activities to avoid sensitive times for biological resources (e.g. steelhead spawning periods during the winter and spring, nesting bird season) and to avoid the rainy season when erosion and sediment transport is increased.</p> <p>j) Develop an invasive species control plan associated with project construction.</p> <p>k) If construction occurs during breeding seasons in or adjacent to suitable habitat, include appropriate sound attenuation measures required for sensitive avian species and other best management practices appropriate for potential local sensitive wildlife.</p> <p>l) Conduct pre-construction surveys to delineate occupied sensitive species' habitat to facilitate avoidance.</p> <p>m) Where projects are determined to be within suitable habitat and may impact listed or sensitive species that have specific field survey protocols or guidelines outlined by the USFWS, CDFW, or other local agency, conduct preconstruction surveys that follow applicable protocols and guidelines and are conducted by qualified and/or certified personnel.</p> <p>n) Project design should address the protection of habitat on both sides of a</p>	<p>project may proceed without any further biological investigation. If wildlife corridors are present, the report shall identify measures (such as providing native landscaping to provide cover on the wildlife corridor) that the individual project would be required to implement such that the existing wildlife corridor would remain. Wildlife corridors identified in the biological resources assessment report shall not be entirely closed by any development or improvements occurring within the Project Area.</p> <p>4.3-1(b) Sensitive Species/Habitat Avoidance: Pre-Construction Bird Nest Surveys, Avoidance, and Notification</p> <p>For all discretionary projects where sensitive species and/or habitat are identified in the biological resources assessment prepared pursuant to MM 4.3-1(a), the biological resources assessment report shall require pre-construction</p>		

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<p>freeway to improve effectiveness of the crossings.</p> <p>o) Project sponsors shall consider the impacts of nitrogen deposition on sensitive species.</p>	<p>surveys for sensitive species and/or construction monitoring to ensure avoidance, relocation, or safe escape of the sensitive species from the construction activities, as appropriate. If sensitive species are found to be nesting, brooding, denning, etc. on-site during the pre-construction survey or during construction monitoring, construction activities shall be halted until offspring are weaned, fledged, etc. and are able to escape the site or be safely relocated to appropriate off-site habitat areas. A qualified biologist shall be on-site to conduct surveys, for construction monitoring, to perform or oversee implementation of protective measures, and to determine when construction activity may resume. Additionally, the biological resources assessment report shall be submitted to DCP and California Department of Fish and Wildlife (CDFW) prior to ground-disturbing activities. A</p>		

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	<p>follow-up report documenting construction monitoring, relocation methods, and the results of the monitoring and species relocation shall be prepared and submitted to DCP and CDFW following construction.</p> <p>Construction activities initiated during the bird nesting season (February 1 – August 31) involving removal of vegetation or other nesting bird habitat, including abandoned structures and other man-made features, a pre-construction nesting bird survey shall be conducted no more than three days prior to initiation of ground disturbance and vegetation removal activities. The nesting bird pre-construction survey shall be conducted on foot and shall include a 100-foot buffer around the construction site. The survey shall be conducted by a biologist familiar with the identification of avian species known to occur in southern California. If nests are found,</p>		

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	<p>an avoidance buffer shall be determined dependent upon the species, the proposed work activity, and existing disturbances associated with land uses outside of the site, which shall be demarcated by the biologist with bright orange construction fencing, flagging, construction lathe, or other means to demarcate the boundary. All construction personnel shall be notified as to the existence of the buffer zone and to avoid entering the buffer zone during the nesting season. No ground disturbing activities shall occur within the buffer until the avian biologist has confirmed that breeding/ nesting is completed, and the young have fledged the nest. Encroachment into the buffer shall occur only at the discretion of the qualified biologist on the basis that the encroachment will not be detrimental to an active nest. A report summarizing the pre-construction survey(s), construction monitoring, and implementation of protective</p>		

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	<p>measures conducted shall be prepared by a qualified biologist.</p> <p>Proposed Project site plans shall include a statement acknowledging compliance with the federal MBTA and CFGC that includes avoidance of active bird nests and identification of Best Management Practices to avoid impacts to active nests, including checking for nests prior to construction activities during February 1 to August 31 and what to do if an active nest is found so that the nest is not inadvertently impacted during grading or construction activities.</p> <p>4.3-1(c) Focused Surveys for Rare Plants If indicated as appropriate by the biological resources assessment report required in Mitigation Measure 4.3-1(a), focused surveys for special status plants shall be conducted. Prior to vegetation clearing for construction in</p>		

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	<p>open space areas, special status plants identified in the focused surveys shall be counted and mapped and a special-status plant relocation plan shall be developed and implemented to provide for translocation of the plants. The plan shall be prepared by a qualified biologist and shall include the following components: (1) identify an area of appropriate habitat, on-site preferred; (2) depending on the species detected, determine if translocation will take the form of seed collection and deposition, or transplanting the plants and surrounding soil as appropriate; (3) develop protocols for irrigation and maintenance of the translocated plants where appropriate; (4) set forth performance criteria (e.g., establishment of quantitative goals, expressed in percent cover or number of individuals, comparing the restored and impacted population) and remedial measures for the</p>		

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	<p>translocation effort; and (5) establish a five-year monitoring procedures/protocols for the translocated plants. Five years after initiation of the restoration activities, a report shall be submitted to DCP and CDFW, which shall at a minimum discuss the implementation, monitoring, and management of the restoration activities over the five-year period and indicate whether the restoration activities have, in part or in whole, been successful based on the established performance criteria. The restoration activities shall be extended if the performance criteria have not been met at the end of the five-year period to the satisfaction of DCP, and CDFW.</p> <p>4.3-1(d) Adaptive Management Plan If indicated as appropriate in a reconnaissance, pre-construction or focused survey required in Mitigation Measure 4.3-1(a), (b), or (c) the biologist</p>		

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	<p>shall prepare an Adaptive Management Plan for future operations to ensure that operations will not result in impacts to special status species, such as lighting plans, fencing plans, revegetation plans, and/or necessary covenants to ensure property owners maintain their properties in a way to reduce impacts to native species, such as requirements for keeping domestic animals or use of non-native vegetation, and/or education campaigns. Applicants shall prepare necessary documentation and provide adequate assurances to ensure compliance with ongoing operational requirements, including, but not limited to, such measures as filing of covenants, creation of funding mechanism, or provision of bonds.</p> <p>4.3-2(a) Habitat Mitigation and Monitoring Plan For discretionary projects that are in areas potentially containing sensitive natural</p>		

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	<p>communities or jurisdictional waters and riparian habitat, including streams, wetlands, riparian habitat, and other water bodies, affected sites as well as off-site areas that may be directly or indirectly affected by the individual development project, prior to the project approval, the applicant shall prepare and submit a Habitat Mitigation and Monitoring Program (HMMP), which shall mitigate for impacts to CDFW jurisdictional habitat at a 2:1 ratio for permanent impacts and a 1:1 ratio for temporary impacts, or as otherwise approved by CDFW and the City.</p> <p>The HMMP shall mitigate for impacts to jurisdictional areas via an acceptable mitigation approach that involves one or a combination of the on-site or off-site restoration or enhancement of degraded in-kind habitats, preservation of in-kind habitats, or by a contribution to an in-lieu fee program approved by the City,</p>		

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	<p>CDFW (and USACE, RWQCB, if applicable).</p> <p>The final HMMP shall be developed by a qualified biologist, restoration ecologist or resource specialist and submitted to and approved by the City and CDFW (USACE, RWQCB, if applicable), in compliance with Clean Water Act Sections 401 and 404 and California Fish and Game Code Section 1602 and supporting regulations, prior to issuance of a grading permit for the project. In broad terms, this Program shall at a minimum include:</p> <ul style="list-style-type: none"> • Description of the project/impact and mitigation sites; • Specific objectives; • Success criteria; • Plant palette; • Implementation plan; • Maintenance activities; • Monitoring plan; and • Contingency measures. 		

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	<p>Success criteria shall at a minimum be evaluated based on appropriate survival rates and percent cover of planted native species, as well as eradication and control of invasive species within the restoration area.</p> <p>The target species and native plant palette, as well as the specific methods for evaluating whether the project has been successful at meeting the above-mentioned success criteria shall be determined by the qualified biologist, restoration ecologist, or resource specialist and included in the HMMP.</p> <p>The HMMP shall be implemented over a five-year period and shall incorporate an iterative process of annual monitoring and evaluation of progress and allow for adjustments to the program, as necessary, to achieve desired outcomes and meet success criteria. Annual reports discussing the implementation,</p>		

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	<p>monitoring, and management of the HMMP shall be submitted to the City and the CDFW (USACE, RWQCB, if applicable). Five years after project start, a final report shall be submitted to the City and the CDFW (USACE, RWQCB, if applicable), which shall at a minimum discuss the implementation, monitoring and management of the mitigation project over the five-year period, and indicate whether the HMMP has met the established success criteria. The annual reports and the final report shall include as-built plans submitted as an appendix to the report. Restoration will be considered successful after the success criteria have been met for a period of at least two years without any maintenance or remediation activities other than invasive species control. The project shall be extended if the success criteria have not been met at the end of the five-year period to the satisfaction of the City and the CDFW</p>		

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	(USACE, RWQCB, if applicable)		
<p>PMM BIO-2</p> <p>In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to riparian habitats and other sensitive natural communities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Consult with the USFWS and NMFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal ESA.</p> <p>b) Consult with the USFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal ESA and any additional species afforded protection by an adopted Forest Land Management Plan or Resource</p>	<p>See language above for 4.3-1(a); 4.3-1(b); 4.3-1(c); 4.3-1(d); and 4.3-2(a).</p>	<p>See language above for B1.</p>	<p>As described in the SCEA, the Project Site is located in an urban area of the City and has previously been developed. No riparian habitat or other sensitive natural communities are located on the Project Site. Therefore, development of the Project would not result in adverse effects to any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service, and no mitigation is required. Thus, the application of SCAG and City mitigation measures regarding riparian habitat and other sensitive natural communities is not required.</p>

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<p>Management Plan for the four national forests in the six-county area: Angeles, Cleveland, Los Padres, and San Bernardino.</p> <p>c) Consult with the CDFW where such state-designated sensitive or riparian habitats provide potential or occupied habitat for state-listed rare, threatened, and endangered species afforded protection pursuant to the California ESA, or Fully Protected Species afforded protection pursuant to the State Fish and Game Code.</p> <p>d) Consult with the CDFW pursuant to the provisions of Section 1600 of the State Fish and Game Code as they relate to Lakes and Streambeds.</p> <p>e) Consult with the USFWS, USFS, CDFW, and counties and cities in the SCAG region, where state-designated sensitive or riparian habitats are occupied by birds afforded protection pursuant to the MBTA during the breeding season.</p> <p>f) Consult with the CDFW for state-designated sensitive or riparian habitats where furbearing mammals, afforded protection pursuant to the provisions of the State Fish and Game Code for furbearing mammals, are actively using the areas in conjunction with breeding activities.</p>			

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<p>g) Require project design to avoid sensitive natural communities and riparian habitats, wherever practicable and feasible. Where practicable and feasible, require upland buffers that sufficiently minimize impacts to riparian corridors.</p> <p>h) Where avoidance is determined to be infeasible, develop sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) to protect sensitive natural communities and riparian habitats and develop appropriate compensatory mitigation, where required.</p> <p>i) Appoint a qualified wetland biologist to monitor construction activities that may occur in or adjacent to sensitive communities.</p> <p>j) Appoint a qualified wetland biologist to monitor implementation of mitigation measures.</p> <p>k) Schedule construction activities to avoid sensitive times for biological resources and to avoid the rainy season when erosion and sediment transport is increased.</p> <p>l) When construction activities require stream crossings, schedule work during dry conditions and use rubber-wheeled vehicles, when feasible. Have a qualified</p>			

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<p>wetland scientist determine if potential project impacts require a Notification of Lake or Streambed Alteration to CDFW during the planning phase of projects.</p> <p>m) Consult with local agencies, jurisdictions, and landowners where such state-designated sensitive or riparian habitats are afforded protection pursuant an adopted regional conservation plan.</p> <p>n) Install fencing and/or mark sensitive habitat to be avoided during construction activities.</p> <p>o) Salvage and stockpile topsoil (the surface material from 6 to 12 inches deep) and perennial native plants, when recommended by the qualified wetland biologist, for use in restoring native vegetation to areas of temporary disturbance within the project area. Salvage of soils containing invasive species, seeds and/or rhizomes will be avoided as identified by the qualified wetland biologist.</p> <p>p) Revegetate with appropriate native vegetation following the completion of construction activities, as identified by the qualified wetland biologist.</p> <p>q) Complete habitat enhancement (e.g., through removal of non-native invasive wetland species and replacement with</p>			

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<p>more ecologically valuable native species).</p> <p>r) Use Best Management Practices (BMPs) at construction sites to minimize erosion and sediment transport from the area. BMPs include encouraging growth of native vegetation in disturbed areas, using straw bales or other silt-catching devices, and using settling basins to minimize soil transport.</p>			
<p>PMM BIO-3</p> <p>In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wetlands, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency.</p> <p>a) Require project design to avoid federally protected aquatic resources consistent with the provisions of Sections 404 and 401 of the CWA, wherever practicable and feasible.</p> <p>b) Where the lead agency has identified that a project, or other regionally significant project, has the potential to</p>	<p>See language above for 4.3-1(a) and 4.3-2(a).</p>	<p>B2 <i>Wetland Habitat.</i> For mobility improvements that extend into the Ballona wetlands, all applicable wetland permits shall be acquired. These permits include, but would not be limited to, a Section 404 Wetlands Fill Permit from the United States Army Corps of Engineers, or a Report of Waste Discharge from the Regional Water Quality Control Board (RWQCB), and a Section 401 Water Quality Certification from the RWCQB. Additionally, a Section 1602 Streambed Alteration Agreement from the California Department of Fish and Wildlife (CDFW) would be required for</p>	<p>As described in the SCEA, the Project Site is not located on or in proximity to protected wetlands or water features, including the Ballona wetlands, that are in the jurisdiction and responsibility of the U.S. Army Corps of Engineers or any other public agencies and/or Lead Agencies, and therefore, the Project does not have the potential to result in impacts to wetlands or other jurisdictional waters and no mitigation is required. Thus, the application of SCAG and City mitigation measures regarding wetlands is not required.</p>

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<p>impact other wetlands or waters, such as those considered Waters Of the State of California under the State Wetland Definition and Procedures for Dischargers of Dredged or Fill Material to Waters of the State, not protected under Section 404 or 401 of the CWA, seek comparable coverage for these wetlands and waters in consultation with the SWRCB, applicable RWQCB, and CDFW.</p> <p>c) Where avoidance is determined to be infeasible, develop sufficient conservation measures to fulfill the requirements of the applicable authorization for impacts to federal and state protected aquatic resource to support issuance of a permit under Section 404 of the CWA as administered by the USACE. The use of an authorized Nationwide Permit or issuance of an individual permit requires the project applicant to demonstrate compliance with the USACE’s Final Compensatory Mitigation Rule. The USACE reviews projects to ensure environmental impacts to aquatic resources are avoided or minimized as much as possible. Consistent with the administration’s performance standard of “no net loss of wetlands” a USACE permit may require a project proponent</p>		<p>development that would cross or affect any stream course.</p> <p>Where feasible, the maximum amount of existing wetlands shall be preserved and minimum 25- to 50-foot buffers around all sides of these features shall be established. In addition, the final project design shall not cause significant changes to the pre-project hydrology, water quality, or water quantity in the wetland that is to be retained. This shall be accomplished by avoiding or repairing any disturbance to the hydrologic conditions supporting these wetlands, as verified through wetland protection plans.</p> <p>Where avoidance of the Ballona Wetlands is not feasible, then mitigation measures shall be implemented for the project-related loss of any existing wetlands on site, such that there is no net loss of wetland acreage or habitat value. Wetland mitigation shall be</p>	

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<p>to restore, establish, enhance or preserve other aquatic resources in order to replace those affected by the proposed project. This compensatory mitigation process seeks to replace the loss of existing aquatic resource functions and area. Project proponents required to complete mitigation are encouraged to use a watershed approach and watershed planning information. The new rule establishes performance standards, sets timeframes for decision making, and to the extent possible, establishes equivalent requirements and standards for the three sources of compensatory mitigation:</p> <ul style="list-style-type: none"> • Permittee-responsible mitigation • Contribution of in-kind in-lieu fees • Use of in-kind mitigation bank credits • Where avoidance is determined to be infeasible and <p>d) Where avoidance is determined to be infeasible and proposed projects' impacts exceed an existing Nationwide Permit (NWP) and/or California SWRCB-certified NWP, or applicable County Special Area Management Plan (SAMP), the lead agency should provide USACE and SWRCB (where applicable)</p>		<p>developed as a part of the Section 404 Clean Water Act permitting process, or for nonjurisdictional wetlands, during permitting through the RWQCB, CDFW and/or USFWS. Mitigation is to be provided prior to construction related impacts on the existing wetlands. The exact mitigation ratio is variable, based on the type and value of the wetlands affected by the project, but agency standards typically require a minimum of 1:1 for preservation and 1:1 for construction of new wetlands. In addition, a Wetland Mitigation and Monitoring Plan shall be developed that includes the following:</p> <ul style="list-style-type: none"> • Descriptions of the wetland types, and their expected functions and values. • Performance standards and monitoring protocol to ensure the success of the mitigation wetlands over a period of five to ten years. 	

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<p>an alternative analysis consistent with the Least Environmentally Damaging Practicable Alternatives in this order of priorities:</p> <ul style="list-style-type: none"> • Avoidance • Impact Minimization • On-site alternatives • Off-site alternatives <p>e) Require review of construction drawings by a certified wetland delineator as part of each project-specific environmental analysis to determine whether aquatic resources will be affected and, if necessary, perform formal wetland delineation.</p>		<ul style="list-style-type: none"> • Engineering plans showing the location, size and configuration of wetlands to be created or restored. • An implementation schedule showing that construction of mitigation areas shall commence prior to or concurrently with the initiation of construction. • A description of legal protection measures for the preserved wetlands (i.e., dedication of fee title, conservation easement, and/ or an endowment held by an approved conservation organization, government agency or mitigation bank). 	
<p>PMM BIO-4</p> <p>In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation</p>	<p>See language above for 4.3-1(a); 4.3-1(b); 4.3-1(c); 4.3-1(d); and 4.3-2(a).</p>	<p>B3</p> <p><i>Migratory Birds</i>. To prevent the disturbance of nesting native and/or migratory bird species, the City shall require that clearing of street trees or other vegetation should take place</p>	<p>As described in the SCEA, the Project Site is located in an urbanized and developed area of the City and has been fully developed in the recent past. The Project Site is not part of a migratory wildlife corridor or native wildlife nursery.</p>

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<p>measures to reduce substantial adverse effects related to wildlife movement, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Consult with the USFS where impacts to migratory wildlife corridors may occur in an area afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-County area: Angeles, Cleveland, Los Padres, and San Bernardino.</p> <p>b) Consult with counties, cities, and other local organizations when impacts may occur to open space areas that have been designated as important for wildlife movement related to local ordinances or conservation plans.</p> <p>c) Prohibit construction activities within 500 feet of occupied breeding areas for wildlife afforded protection pursuant to Title 14 § 460 of the California Code of Regulations protecting fur-bearing mammals, during the breeding season.</p> <p>d) Conduct a survey to identify active raptor and other migratory nongame bird nests by a qualified biologist at least two weeks before the start of construction at project sites from February 1 through August 31.</p>		<p>between September 1 and February 14. If construction is scheduled or ongoing during bird nesting season (February 15 to August 31), the City of Los Angeles shall require that a qualified biologist conduct a nesting bird survey within 250 feet of the construction activity, no less than 14 days and no more than 30 days prior to the commencement of construction activities. Surveys shall be conducted in accordance with CDFW protocols, as applicable. If no active nests are identified on or within 250 feet of the construction activity, no further mitigation is necessary. A copy of the preconstruction survey shall be submitted to the Department of City Planning. If an active nest is identified, construction shall be suspended within 100 feet of the nest until the nesting cycle is complete, as determined by a qualified ornithologist or biologist.</p>	<p>Therefore, the Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites, and no mitigation is required. Thus, the application of SCAG and City mitigation measures regarding onsite wildlife movement is not required.</p> <p>No trees are located on the Project Site, and the four street trees located along La Cienega adjacent to the Project Site, some or all of which could be removed as part of the Project, are not considered a “protected tree,” as defined by the City. However, as described in the SCEA, these trees could potentially provide nesting sites for migratory birds. Thus, as further described in the SCEA, the Project would be required to comply with the Migratory Bird Treaty Act (MBTA) (Title 33, United States Code, Section 703 et seq., see also Title 50, Code of Federal Regulation, Part 10) and Section 3503 of the California Department of Fish and</p>

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<p>e) Prohibit construction activities with 300 feet of occupied nest of birds afforded protection pursuant to the Migratory Bird Treaty Act, during the breeding season.</p> <p>f) Ensure that suitable nesting sites for migratory nongame native bird species protected under the Migratory Bird Treaty Act and/or trees with unoccupied raptor nests should only be removed prior to February 1, or following the nesting season.</p> <p>g) When feasible and practicable, proposed projects will be designed to minimize impacts to wildlife movement and habitat connectivity and preserve existing and functional wildlife corridors.</p> <p>h) Conduct site-specific analyses of opportunities to preserve or improve habitat linkages with areas on- and off-site.</p> <p>i) Long linear projects with the possibility of impacting wildlife movement should analyze habitat linkages/wildlife movement corridors on a broad scale to avoid critical narrow choke points that could reduce function of recognized movement corridor.</p> <p>j) Require review of construction drawings and habitat connectivity mapping by a qualified biologist to</p>			<p>Wildlife Code, which regulates vegetation removal during the nesting season to ensure that significant impacts to migratory birds would not occur. These same regulatory requirements are contained in the mitigation measures identified by SCAG and the City; therefore, the Project's required compliance with these regulatory requirements will achieve consistency with these mitigation measures. Therefore, incorporation of these SCAG and City mitigation measures into the Project is not required.</p>

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<p>determine the risk of habitat fragmentation.</p> <p>k) Pursue mitigation banking to preserve habitat linkages and corridors (opportunities to purchase, maintain, and/or restore offsite habitat).</p> <p>l) When practicable and feasible design projects to promote wildlife corridor redundancy by including multiple connections between habitat patches.</p> <p>m) Evaluate the potential for installation of overpasses, underpasses, and culverts to create wildlife crossings in cases where a roadway or other transportation project may interrupt the flow of species through their habitat. Retrofitting of existing infrastructure in project areas should also be considered for wildlife crossings for purposes of mitigation.</p> <p>n) Install wildlife fencing where appropriate to minimize the probability of wildlife injury due to direct interaction between wildlife and roads or construction.</p> <p>o) Where avoidance is determined to be infeasible, design sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) and in accordance with the respective counties and cities general plans to establish</p>			

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<p>plans to mitigate for the loss of fish and wildlife movement corridors and/or wildlife nursery sites. The consideration of conservation measures may include the following measures, in addition to the measures outlined in MM-BIO-1(b), where applicable:</p> <ul style="list-style-type: none"> • Wildlife movement buffer zones • Corridor realignment • Appropriately spaced breaks in center barriers • Stream rerouting • Culverts • Creation of artificial movement corridors such as freeway under- or overpasses • Other comparable measures <p>p) Where the lead agency has identified that a RTP/SCS project, or other regionally significant project, has the potential to impact other open space or nursery site areas, seek comparable coverage for these areas in consultation with the USFWS, CDFW, NMFS, or other local jurisdictions.</p> <p>q) Incorporate applicable and appropriate guidance (e.g. FHWA-HEP-16-059), as well as best management practices, to benefit pollinators with a focus on native plants.</p>			

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<p>r) Implement berms and sound/sight barriers at all wildlife crossings to encourage wildlife to utilize crossings. Sound and lighting should also be minimized in developed areas, particularly those that are adjacent to or go through natural habitats.</p> <p>s) Reduce lighting impacts on sensitive species through implementation of mitigation measures such as, but not limited to:</p> <ul style="list-style-type: none"> • Use high pressure sodium and/or cut-off fixtures instead of typical mercury-vapor fixtures for outdoor lighting. • Design exterior lighting to confine illumination to the project site • Provide structural and/or vegetative screening from light-sensitive uses. • Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces. • Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties. 			

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<p>t) Reduce noise impacts to sensitive species through implementation of mitigation measures such as, but not limited to:</p> <ul style="list-style-type: none"> • Install temporary noise barriers during construction. • Include permanent noise barriers and sound-attenuating features as part of the project design. Barriers could be in the form of outdoor barriers, sound walls, buildings, or earth berms to attenuate noise at adjacent sensitive uses. • Ensure that construction equipment are properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded. • Use hydraulically or electrically powered tools (e.g., jack hammers, pavement breakers, 			

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<p>and rock drills) for project construction to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust should be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves should be used, if such jackets are commercially available, and this could achieve a further reduction of 5 dBA. Quieter procedures should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures.</p> <ul style="list-style-type: none"> • Using rubberized asphalt or “quiet pavement” to reduce road noise for new roadway segments, roadways in which widening or other modifications require re-pavement, or normal reconstruction of roadways where re-pavement is planned • Use equipment and trucks with the best available noise control 			

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<p>techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds, wherever feasible) for project construction.</p> <ul style="list-style-type: none"> • Use techniques such as grade separation, buffer zones, landscaped berms, dense plantings, sound walls, reduced-noise paving materials, and traffic calming measures. <p>u) Require large buffers between sensitive uses and freeways.</p> <p>v) Create corridor redundancy to help retain functional connectivity and resilience.</p>			
<p>PMM BIO-5</p> <p>In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce conflicts with local policies and ordinances protecting biological resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p>	<p>4.3-2(b) Protected Tree and Tree Canopy Survey</p> <p>For discretionary projects that include the removal of trees, prior to project approval, a tree report and tree replanting plan shall be conducted by a certified arborist to tag and assess all trees (defined as woody plant material that is five inches or greater in diameter at breast height [DBH – four and a half feet off grade]) subject to</p>	<p>No applicable mitigation measure.</p>	<p>As described above and in the SCEA, while no sensitive natural communities or habitat exist on or adjacent to the Project Site, various on-site and off-site trees exist. In compliance with existing City regulations, a Tree Report was prepared for the Project (see SCEA Appendix C), which concluded there are no protected tree species on the Project Site. Four street trees (one Indian laurel fig and three fern pines) are located along La Cienega</p>

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<p>a) Consult with the appropriate local agency responsible for the administration of the policy or ordinance protecting biological resources.</p> <p>b) Prioritize retention of trees on-site consistent with local regulations. Provide adequate protection during the construction period for any trees that are to remain standing, as recommended by an International Society of Arboriculture (ISA) certified arborist.</p> <p>c) If specific project area trees are designated as “Protected Trees,” “Landmark Trees,” or “Heritage Trees,” obtain approval for encroachment or removals through the appropriate entity, and develop appropriate mitigation measures at that time, to ensure that the trees are replaced. Mitigation trees shall be locally collected native species, as directed by a qualified biologist.</p> <p>d) Appoint an ISA certified arborist to monitor construction activities that may occur in areas with trees are designated as “Protected Trees,” “Landmark Trees,” or “Heritage Trees,” to facilitate avoidance of resources not permitted for impact. Before the start of any clearing, excavation, construction or other work on the site, securely fence off every protected tree deemed to be potentially endangered by said site work. Keep</p>	<p>the City’s Protected Tree Ordinance on the project site. Trees shall be tagged to correspond with a tree exhibit map. Also, the genus and species of the trees, size of the trees at DBH, and structure and vigor of the trees shall be determined, and an evaluation of the trees’ resource value (i.e., the biological impacts of the tree removals, potential to be considered wildlife habitat, and locating trees deserving protection) shall be completed. All protected trees shall receive a visual tree assessment (VTA – meaning tree observations shall be from the ground and that no special devices [e.g., increment borers, drills] shall be used). Following the completion of the tree survey, the arborist shall prepare a report that shall at a minimum provide a description of the general character of the trees on the site and identify opportunities and constraints for preservation. The report and tree replanting plan shall be provided to the City for</p>		<p>Boulevard adjacent to the Project Site, some or all of which could be removed as part of the Project. As further required by existing City regulations, the Applicant would be required to plant replacement trees on or adjacent to the Project Site in conformance with the City’s Urban Forestry Division requirements for Project landscaping and tree replacement and planting. Any on-site tree removal will comply with the City’s Tree Replacement Program, and any removal and replacement of street trees in the public right-of-way will be to the satisfaction of the Urban Forestry Division, Bureau of Street Services requirements for a 2:1 ratio. If all four street trees are removed, eight would be required to be planted. Compliance with these existing regulations, which are equal to or more effective than the relevant mitigation measures identified by SCAG and the City, would ensure that no significant impacts to trees would occur; therefore, incorporation of these SCAG and City mitigation measures into the Project is not required.</p>

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<p>such fences in place for duration of all such work. Clearly mark all trees to be removed.</p> <p>e) Establish a scheme for the removal and disposal of logs, brush, earth and other debris that will avoid injury to any protected tree. Where proposed development or other site work could encroach upon the protected perimeter of any protected tree, incorporate special measures to allow the roots to breathe and obtain water and nutrients. Minimize any excavation, cutting, filing, or compaction of the existing ground surface within the protected perimeter. Require that no change in existing ground level occur from the base of any protected tree at any time. Require that no burning or use of equipment with an open flame occur near or within the protected perimeter of any protected tree.</p> <p>f) Require that no storage or dumping of oil, gas, chemicals, or other substances that may be harmful to trees occur from the base of any protected trees, or any other location on the site from which such substances might enter the protected perimeter. Require that no heavy construction equipment or construction materials be operated or stored within a distance from the base of</p>	<p>review. As part of the assessment, a plot plan shall also be prepared indicating the location, type, and canopy coverage of all existing trees on the site and within the adjacent public right(s)-of-way.</p> <p>Based on the results of the tree survey, development plans shall be clustered to maximum extent feasible in order to avoid impacts to sensitive natural communities (e.g., oak woodlands, riparian habitats, extensive tree canopy) and to maintain the largest and most contiguous area of sensitive communities on the site. Additionally, the development plans shall include a proposed minimum buffer to protect adjacent sensitive communities. Development plans that impact sensitive natural communities shall include a detailed feasibility analysis showing how the design has accomplished these avoidance strategies; the City shall not approve development plans until the</p>		

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<p>any protected trees. Require that wires, ropes, or other devices not be attached to any protected tree, except as needed for support of the tree. Require that no sign, other than a tag showing the botanical classification, be attached to any protected tree.</p> <p>g) Thoroughly spray the leaves of protected trees with water periodically during construction to prevent buildup of dust and other pollution that would inhibit leaf transpiration, as directed by the certified arborist.</p> <p>h) If any damage to a protected tree should occur during or as a result of work on the site, the appropriate local agency will be immediately notified of such damage. If, such tree cannot be preserved in a healthy state, as determined by the certified arborist, require replacement of any tree removed with another tree or trees on the same site deemed adequate by the local agency to compensate for the loss of the tree that is removed. Remove all debris created as a result of any tree removal work from the property within two weeks of debris creation, and such debris shall be properly disposed of in accordance with all applicable laws, ordinances, and regulations. Design projects to avoid conflicts with local policies and</p>	<p>site design has adequately demonstrated maximum avoidance of sensitive natural communities to the satisfaction of City Planning.</p> <p>Further, removal or planting of any tree in the public right(s)-of-way requires approval of the Board of Public Works. All trees in the public right(s)-of-way shall conform to the current standards of the Department of Public Works, Urban Forestry Division, Bureau of Street Services.</p> <p>The following measures shall be implemented in addition to those required under the City's Protected Tree Ordinance (Ordinance No. 177,404) to avoid and/or compensate for potential indirect impacts to preserved sensitive natural communities before, during, and following construction activities.</p> <p><i>Pre-Construction</i></p> <ul style="list-style-type: none"> Fencing: Protective fencing at least three feet high with signs 		

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<p>ordinances protecting biological resources</p> <p>i) Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the applicable policy or ordinance shall be developed, such as to support issuance of a tree removal permit. The consideration of conservation measures may include:</p> <ul style="list-style-type: none"> • Avoidance strategies • Contribution of in-lieu fees • Planting of replacement trees • Re-landscaping areas with native vegetation post-construction • Other comparable measures developed in consultation with local agency and certified arborist. 	<p>and flagging shall be erected around all preserved sensitive natural communities where adjacent to proposed vegetation clearing and grubbing, grading, or other construction activities. The protective fence shall be installed at a minimum of five feet beyond the tree canopy dripline. The intent of protection fencing is to prevent inadvertent limb/vegetation damage, root damage and/or compaction by construction equipment. The protective fencing shall be depicted on all construction plans and maps provided to contractors and labeled clearly to prohibit entry, and the placement of the fence in the field shall be approved by a</p>		

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	<p>qualified biologist prior to initiation of construction activities. The contractor shall maintain the fence to keep it upright, taut and aligned at all times. Fencing shall be removed only after all construction activities are completed.</p> <ul style="list-style-type: none"> • Pre-Construction Meeting: A pre-construction meeting shall be held between all site contractors and a registered consulting arborist and/or a qualified biologist. All site contractors and their employees shall provide written acknowledgement of their receiving sensitive natural community protection training. This training shall include, but shall not be limited to, the following information: (1) the location and marking of protected 		

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	<p>sensitive natural communities; (2) the necessity of preventing damage to these sensitive natural communities; and (3) a discussion of work practices that shall accomplish such.</p> <p><i>During Construction</i></p> <ul style="list-style-type: none"> • Fence Monitoring: The protective fence shall be monitored regularly (at least weekly) during construction activities to ensure that the fencing remains intact and functional, and that no encroachment has occurred into the protected natural community; any repairs to the fence or encroachment correction shall be conducted immediately. • Equipment Operation and Storage: Contractors shall avoid using heavy 		

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	<p>equipment around the sensitive natural communities. Operating heavy machinery around the root zones of trees would increase soil compaction, which decreases soil aeration and, subsequently, reduces water penetration into the soil. All heavy equipment and vehicles shall, at minimum, stay out of the fenced protected zones, unless where specifically approved in writing and under the supervision of a registered consulting arborist and/or a qualified biologist.</p> <ul style="list-style-type: none"> Materials Storage and Disposal: Contractors shall not store or discard any construction materials within the fenced protected zones and shall remove all foreign 		

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	<p>debris within these areas. The contractors shall leave the duff, mulch, chips, and leaves around the retained trees for water retention and nutrient supply. Contractors shall avoid draining or leakage of equipment fluids near retained trees. Fluids such as gasoline, diesel, oils, hydraulics, brake and transmission fluids, paint, paint thinners, and glycol (anti-freeze) shall be disposed of properly. The contractors shall ensure that equipment be parked at least 50 feet, and that equipment/vehicle refueling occur at least 100 feet, from fenced protected zones to avoid the possibility of leakage of equipment fluids into the soil.</p> <ul style="list-style-type: none"> Grade Changes: Contractors shall 		

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	<p>ensure that grade changes, including adding fill, shall not be permitted within the fenced protected zone without special written authorization and under supervision by a registered consulting arborist and/or a qualified biologist. Lowering the grade within the fenced protected zones could necessitate cutting main support and feeder roots, thus jeopardizing the health and structural integrity of the tree(s). Adding soil, even temporarily, on top of the existing grade could compact the soil further, and decrease both water and air availability to the tree roots. Contractors shall ensure that grade changes made outside of the fenced protected zone shall not create</p>		

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	<p>conditions that allow water to pond.</p> <ul style="list-style-type: none"> • Trenching: Except where specifically approved in writing beforehand, all trenching shall be outside of the fenced protected zone. Roots primarily extend in a horizontal direction forming a support base to the tree similar to the base of a wineglass. Where trenching is necessary in areas that contain roots from retained trees, contractors shall use trenching techniques that include the use of either a root pruner (Dosko root pruner or equivalent) or an Air-Spade to limit root impacts. A registered consulting arborist shall ensure that all pruning cuts shall be clean and sharp, to minimize ripping, tearing, and fracturing 		

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	<p>of the root system. Root damage caused by backhoes, earthmovers, dozers, or graders is severe and may ultimately result in tree mortality. Use of both root pruning and Air-Spade equipment shall be accompanied only by hand tools to remove soil from trench locations. The trench shall be made no deeper than necessary.</p> <ul style="list-style-type: none"> • Erosion Control: Appropriate erosion control best management practices (BMPs) shall be implemented to protect preserved sensitive natural communities during and following project construction. Erosion control materials shall be certified as weed free. • Inspection: A registered consulting 		

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	<p>arborist shall inspect the preserved trees adjacent to grading and construction activity on a monthly basis for the duration of the grading and construction activities. A report summarizing site conditions, observations, tree health, and recommendations for minimizing tree damage shall be submitted by the registered consulting arborist following each inspection.</p> <p><i>Post-construction</i></p> <ul style="list-style-type: none"> • Mulch: The contractors shall ensure that the natural duff layer under all trees adjacent to construction activities shall be maintained. This would stabilize soil temperatures in root zones, conserve soil moisture, and reduce erosion. The 		

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	<p>contractors shall ensure that the mulch be kept clear of the trunk base to avoid creating conditions favorable to the establishment and growth of decay causing fungal pathogens. Should it be necessary to add organic mulch beneath retained oak trees, packaged or commercial oak leaf mulch shall not be used as it may contain root fungus. Also, the use of redwood chips shall be avoided as certain inhibitive chemicals may be present in the wood. Other wood chips and crushed walnut shells can be used, but the best mulch that provides a source of nutrients for the tree is its own leaf litter. Any added organic mulch added by the</p>		

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	<p>contractors shall be applied to a maximum depth of 4 inches where possible.</p> <ul style="list-style-type: none"> Watering Adjacent Plant Material: All installed landscaping plants near the preserved sensitive natural communities shall require moderate to low levels of water. The surrounding plants shall be watered infrequently with deep soaks and allowed to dry out in-between, rather than frequent light irrigation. The soil shall not be allowed to become saturated or stay continually wet, nor should drainage allow ponding of water. Irrigation spray shall not hit the trunk of any tree. The contractors shall maintain a 30-inch dry-zone around all tree trunks. An above ground micro-spray irrigation system 		

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	<p>shall be used in lieu of typical underground pop-up sprays.</p> <ul style="list-style-type: none"> Monitoring: A certified arborist shall inspect the trees preserved on the site adjacent to construction activities for a period of two years following the completion of construction. Monitoring visits shall be completed quarterly, totaling eight visits. Following each monitoring visit, a report summarizing site conditions, observations, tree health, and recommendations for promoting tree health shall be prepared. Additionally, any tree mortality shall be noted and any tree dying during the two-year monitoring period shall be replaced at a minimum 3:1 ratio on- 		

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	site in coordination with the City.		
<p>PMM BIO-6</p> <p>In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on HCPs and NCCPs, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Consult with the appropriate federal, state, and/or local agency responsible for the administration of HCPs or NCCPs.</p> <p>b) Wherever practicable and feasible, the project shall be designed to avoid lands preserved under the conditions of an HCP or NCCP.</p> <p>c) Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the HCP and/or NCCP, which would include but not be limited to applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal Endangered Species Act or Section</p>	No applicable mitigation measure.	No applicable mitigation measure.	As described in the SCEA, the Project Site is not subject to any provisions of any Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Furthermore, the Project Site is not within or adjacent to an existing Significant Ecological Area. Thus, the application of SCAG mitigation measures regarding such designated conservation areas is not required.

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<p>2081 of the California ESA, shall be developed to support issuance of an incidental take permit or any other permissions required for development within the HCP/NCCP boundaries. The consideration of additional conservation measures would include the measures outlined in SMM-BIO-2, where applicable.</p>			
Cultural Resources			
<p>PMM CULT-1</p> <p>In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Pursuant to <i>CEQA Guidelines</i> Section 15064.5, conduct a record search during the project planning phase at the appropriate Information Center to determine whether the project area has been previously surveyed and whether historical resources were identified.</p>	<p>4.4-1(a) Identification of Built-Environment Historical Resources</p> <p>For discretionary projects, the following procedures shall be implemented to identify historical resources, as defined by Public Resources Code Section 21084.1, located on or near a development site and implement appropriate techniques to avoid or reduce significant impacts to historical resources.</p> <p>The City of Los Angeles Historic Resources Survey (SurveyLA) results shall be consulted to determine whether the project area, or adjacent areas, have been</p>	<p>No applicable mitigation measure.</p>	<p>As described in the SCEA, a Cultural Resources Technical Appendix was prepared for the Project (see Appendix D) to identify potential impacts to cultural resources. No historical resources are located on the Project Site. However, the Project Site is located west of a locally designated historic district, the South Carthay Historic Preservation Overlay Zone (HPOZ), which is itself part of the larger Carthay Neighborhoods Historic District, which was listed in the California Register in January 2022 and in the National Register in March 2022. To address potential indirect Project impacts to adjacent historical resources located within the HPOZ, the City, as lead agency, has identified mitigation that has</p>

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<p>b) During the project planning phase, retain a qualified architectural historian, defined as an individual who meets the Secretary of the Interior’s (SOI) Professional Qualification Standards (PQS) in Architectural History, to conduct historic architectural surveys if a built environment resource greater than 45 years in age may be affected by the project or if recommended by the Information Center.</p> <p>c) Comply with Section 106 of the National Historic Preservation Act (NHPA) including, but not limited to, projects for which federal funding or approval is required for the individual project. This law requires federal agencies to evaluate the impact of their actions on resources included in or eligible for listing in the National Register. Federal agencies must coordinate with the State Historic Preservation Officer in evaluating impacts and developing mitigation. These mitigation measures may include, but are not limited to the following:</p> <ul style="list-style-type: none"> • Employ design measures to avoid historical resources and undertake adaptive reuse where appropriate and feasible. If resources are to be preserved, as feasible, carry out the 	<p>subject to previous cultural resources studies and whether historical resources were identified.</p> <p>If a development involves the alteration or demolition of a property 45 years of age or older that was not evaluated in SurveyLA, including sites with a QQQ code, a historical resources evaluation shall be prepared for the development. The evaluation shall be prepared according to the following standards:</p> <ul style="list-style-type: none"> • The evaluation shall be prepared by a qualified architectural historian or historian who meets the Secretary of the Interior’s Professional Qualifications Standards (PQS) in architectural history or history. • The qualified architectural historian or historian shall conduct an intensive-level evaluation in accordance with the 		<p>been tailored to address Project-specific impacts. Specifically, Mitigation Measures MM-NOI-8 through MM-NOI-10 (described below) have been identified for the Project to ensure that construction-related vibration would not cause structural damage to any such historical resources. With implementation of these measures, the Project would not result in any direct impacts to any historical resources. These measures take into consideration Project-specific construction and location details, and therefore are more tailored to the Project than the more general SCAG and City mitigation measures addressing potential impacts to historical resources; accordingly, the application of SCAG and City mitigation measures regarding potential impacts to historical resources is not required.</p> <p>Regarding archaeological resources, the South Central Coast Information Center (SCCIC) conducted a records search for the Project Site and a half-mile radius around the Site. The records search was completed in October 2020.</p>

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<p>maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction in a manner consistent with the Secretary of the Interior’s Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings. If resources would be impacted, impacts should be minimized to the extent feasible.</p> <ul style="list-style-type: none"> Where feasible, noise buffers/walls and/or visual buffers/landscaping should be constructed to preserve the contextual setting of significant built resources. <p>d) If a project requires the relocation, rehabilitation, or alteration of an eligible historical resource, the Secretary of the Interior’s Standards for the Treatment of Historic Properties should be used to the maximum extent possible to ensure the historical significance of the resource is not impaired. The application of the standards should be overseen by an architectural historian or historic architect meeting the SOI PQS. Prior to any construction activities that may affect the historical resource, a report, meeting industry standards, should</p>	<p>guidelines and best practices promulgated by the State Office of Historic Preservation (OHP) and the City of Los Angeles Office of Historic Resources (OHR) to identify any potential historical resources within the Area of Potential Effects.</p> <p>Those buildings and structures required to be assessed in a historical resource evaluation not located in an HPOZ shall be evaluated within their historic context and documented in a report meeting the OHP and OHR guidelines. All evaluated properties shall be documented on Department of Parks and Recreation Series 523 Forms. The report shall be submitted to the OHR for review and concurrence. If, as a result of the cultural resources records search or the subsequent historical resources evaluation, it is determined that the proposed development would result in a</p>		<p>The search did not identify any known prehistoric or historic resources on the Project Site. Three prehistoric resources, five historic resources, and one site containing prehistoric and historic resources were identified within a half-mile radius of the Project Site. Notwithstanding the lack of identified cultural resources at the Project Site, the potential for inadvertent discovery of unidentified archaeological resources exists in connection with Project construction. Accordingly, the City has determined that the Project would implement MM-CUL-1, which is equal to or more effective than the mitigation measures identified by SCAG and the City.</p> <p>MM-CUL-1: Inadvertent Discovery of Archaeological Resources</p> <ul style="list-style-type: none"> If any archaeological materials are encountered during the course of Project development, all further development activity in the vicinity of the materials shall halt and: <ul style="list-style-type: none"> The services of an archaeologist shall then be secured by contacting the South Central Coastal

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<p>identify and specify the treatment of character-defining features and construction activities and be provided to the Lead Agency for review and approval.</p> <p>e) If a project would result in the demolition or significant alteration of a historical resource eligible for or listed in the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), or local register, recordation should take the form of Historic American Buildings Survey (HABS), Historic American Engineering Record (HAER), or Historic American Landscape Survey (HALS) documentation, and should be performed by an architectural historian or historian who meets the SOI PQS. Recordation should meet the SOI Standards and Guidelines for Architectural and Engineering, which defines the products acceptable for inclusion in the HABS/HAER/HALS collection at the Library of Congress. The specific scope and details of documentation should be developed at the project level in coordination with the Lead Agency.</p> <p>f) During the project planning phase, obtain a qualified archaeologist, defined as one who meets the SOI PQS for</p>	<p>significant adverse effect to one or more historical resources, appropriate techniques consistent with the Secretary of Interior Standards to avoid or reduce significant impacts to the degree feasible shall be implemented. Measures to reduce impacts shall generally be overseen by a qualified architectural historian or historic architect meeting the PQS, unless unnecessary under the circumstance (e.g., preservation in place). In conjunction with any development application that may affect the historical resource, a mitigation plan identifying measures for the treatment or protection of character-defining features shall be provided to the City for review. Measures may include but not be limited to mitigation measures 4.4-1(b) to 4.4-1(j) below.</p> <p>4.4-1(b) Rehabilitation of Historical Resources</p>		<p>Information Center (657-278-5395) located at California State University Fullerton, or a member of the Society of Professional Archaeologist (SOPA) or a SOPA-qualified archaeologist, who shall assess the discovered material(s) and prepare a survey, study, or report evaluating the impact;</p> <p>o The archaeologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource; and</p> <p>o The Project Applicant shall comply with the recommendations of the evaluating archaeologist, as contained in the survey, study, or report.</p> <p>• Project development activities may resume once copies of the</p>

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<p>archaeology, to conduct a record search at the appropriate Information Center of the California Historical Resources Information System (CHRIS) to determine whether the project area has been previously surveyed and whether resources were identified.</p> <p>g) Contact the NAHC to request a Sacred Lands File search and a list of relevant Native American contacts who may have additional information.</p> <p>h) During the project planning phase, obtain a qualified archaeologist or architectural historian (depending on applicability) to conduct archaeological and/or historic architectural surveys as recommended by the qualified professional, the Lead Agency, or the Information Center. In the event the qualified professional or Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for archaeological resources. Survey shall be conducted where the records indicate that no previous survey has been conducted, or if survey has not been conducted within the past 10 years. If tribal resources are identified during tribal outreach, consultation, or the record search, a Native American representative traditionally affiliated with</p>	<p>If required under the mitigation plan in the historical resources evaluation prepared under MM 4.4-1(a), comply with the following measure.</p> <p>If a development proposes alteration or addition to a historical resource to allow for its continued use, the integrity of the resource could be undermined such that it would no longer convey the historical associations that make it eligible for listing. To reduce such impacts, a resource may be rehabilitated in conformance with the Secretary's Standards to allow for continued or new uses while maintaining features that convey the resource's historical significance. Construction of a project as it relates to rehabilitation of a historical resource shall be monitored for compliance with the Secretary's Standards. The construction monitoring shall:</p> <ul style="list-style-type: none"> • Be performed by a professional meeting the Secretary of the 		<p>archaeological survey, study or report are submitted to:</p> <p style="padding-left: 40px;">SCCIC Department of Anthropology McCarthy Hall 477 CSU Fullerton 800 North State College Boulevard Fullerton, CA 92834</p> <ul style="list-style-type: none"> • Prior to the issuance of any building permit, the Project Applicant shall submit a letter to the case file indicating what, if any, archaeological reports have been submitted, or a statement indicating that no material was discovered. • A covenant and agreement binding the Project Applicant to this condition shall be recorded prior to the issuance of a grading permit. <p>With implementation of this mitigation measure, no potential impacts pertaining to inadvertent discovery of archaeological resources would occur; therefore, the application of SCAG and City mitigation measures regarding archaeological resources is not required.</p>

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<p>the project area, as identified by the NAHC, shall be given the opportunity to provide a representative or monitor to assist with archaeological surveys.</p> <p>i) If potentially significant archaeological resources are identified through survey, and impacts to these resources cannot be avoided, a Phase II Testing and Evaluation investigation should be performed by a qualified archaeologist prior to any construction-related ground-disturbing activities to determine significance. If resources determined significant or unique through Phase II testing, and avoidance is not possible, appropriate resource-specific mitigation measures should be established by the lead agency, in consultation with consulting tribes, where appropriate, and undertaken by qualified personnel. These might include a Phase III data recovery program implemented by a qualified archaeologist and performed in accordance with the OHP's Archaeological Resource Management Reports (ARMR): Recommended Contents and Format and Guidelines for Archaeological Research Designs. Additional options can include 1) interpretative signage, or 2) educational outreach that helps inform the public of the past activities that occurred in this</p>	<p>Interior's Professional Qualifications Standards (PQS) for historic architecture with at least five years of demonstrated experience in rehabilitating historic buildings of similar size.</p> <ul style="list-style-type: none"> • Be performed by the professional at regular intervals during the rehabilitation of the historical resource. The intervals shall include, but not necessarily limited to 50 percent, 90 percent, and 100 percent construction. <p>The monitor shall create a technical memorandum at each interval summarizing the findings, making recommendations as necessary to ensure compliance with the Secretary's Standards, and documenting construction with digital photographs.</p>		

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<p>area. Should the project require extended Phase I testing, Phase II evaluation, or Phase III data recovery, a Native American representative traditionally affiliated with the project area, as indicated by the NAHC, shall be given the opportunity to provide a representative or monitor to assist with the archaeological assessments. The long-term disposition of archaeological materials collected from a significant resource should be determined in consultation with the affiliated tribe(s), where relevant; this could include curation with a recognized scientific or educational repository, transfer to the tribe, or respectful reinternment in an area designated by the tribe.</p> <p>j) In cases where the project area is developed and no natural ground surface is exposed, sensitivity for subsurface resources should be assessed based on review of literature, geology, site development history, and consultation with tribal parties. If this archaeological desktop assessment indicates that the project is located in an area sensitive for archaeological resources, as determined by the Lead Agency in consultation with a qualified archaeologist, the project should retain an archaeological monitor and, in the</p>	<p>Compliance with the Secretary's Standards shall include the review specifications, tests, and mockups for the treatment of historic building materials.</p> <p>The monitor shall submit the memoranda to City of Los Angeles Office of Historic Resources (OHR) for concurrence. In the event OHR does not concur, all activities shall cease until compliance with the Secretary's Standards is resolved and concurrence is obtained.</p> <p>4.4-1(c) Design Requirements for New Construction</p> <p>If required under the mitigation plan in the historical resources evaluation prepared under MM 4.4-1(a), comply with the following measure.</p> <p>If a development proposes new construction on a site containing a historical resource, the project design team shall consult with a</p>		

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<p>case of sensitivity for tribal resources, a tribal monitor, to observe ground disturbing operations, including but not limited to grading, excavation, trenching, or removal of existing features of the subject property. The archaeological monitor should be supervised by an archaeologist meeting the SOI PQS</p> <p>k) Conduct construction activities and excavation to avoid cultural resources (if identified). If avoidance is not feasible, further work may be needed to determine the importance of a resource. Retain a qualified archaeologist, and/or as appropriate, a qualified architectural historian who should make recommendations regarding the work necessary to assess significance. If the cultural resource is determined to be significant under state or federal guidelines, impacts to the cultural resource will need to be mitigated.</p> <p>l) Stop construction activities and excavation in the area where cultural resources are found until a qualified archaeologist can determine whether these resources are significant, and tribal consultation can be conducted, in the case of tribal resources. If the archaeologist determines that the discovery is significant, its long-term disposition should be determined in</p>	<p>preservation architect or other qualified professional to ensure that new construction is designed and constructed in accordance with the Secretary of Interior's Standards to ensure the proposed new construction would protect the historic integrity of the historical resource and any adjacent historical resources. The final design shall require the approval of OHR. In the event OHR does not concur, all activities shall cease until compliance with the Secretary's Standards is resolved and concurrence is obtained.</p> <p>4.4-1(d) Relocation and Rehabilitation of Historical Resources</p> <p>If required under the mitigation plan in the historical resources evaluation prepared under MM 4.4-1(a), comply with the following measure.</p> <p>For any project for which retention or rehabilitation of a historical resource is not</p>		

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<p>consultation with the affiliated tribe(s); this could include curation with a recognized scientific or educational repository, transfer to the tribe, or respectful reinternment in an area designated by the tribe.</p>	<p>feasible, a feasibility study, subject to City review and approval, shall be prepared weighing the costs, advantages, and disadvantages of relocation, which would preclude the demolition of a resource by removing it intact to another site. If the study concludes it is feasible to relocate the historical resource, the structure's availability shall be advertised in historic preservation websites such as HistoricForSale, Historic Properties, Old Houses, and Preservation Directory and a local newspaper such as the Los Angeles Times for a period of not less than 60 days by the project applicant. Any such relocation efforts shall be undertaken in accordance with a Relocation and Rehabilitation Plan prepared by the party taking possession of the structure to be moved. The Relocation and Rehabilitation Plan shall be developed in conjunction with a qualified architectural historian, historic</p>		

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	<p>architect, or historic preservation professional who satisfies the Secretary of the Interior's Professional Qualifications Standards (PQS) for History, Architectural History, or Architecture, pursuant to 36 CFR 61. The Plan shall include relocation methodology recommended by the National Park Service, which are outlined in the booklet entitled "Moving Historic Buildings," by John Obed Curtis (1979). Upon relocation of the structure to the new site, any maintenance, repair, stabilization, rehabilitation, preservation, conservation, or reconstruction work performed in conjunction with the relocation of the building shall be undertaken in a manner consistent with the Secretary's Standards. The Relocation and Rehabilitation Plan shall be reviewed and approved by the City of Los Angeles Office of Historic Resources (OHR) prior to its implementation. In addition, a plaque describing the date of</p>		

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	<p>the move and the original location shall be placed in a visible location on the historical resource. If after three months it is evident that no party is interested in purchasing the historical resource per the mitigation measure stipulated above, then the Historic American Building Survey (HABS) Level II documentation, as described below in Mitigation Measure 4.4-1(e), would be required to document the important history and architecture of the historical resource. Relocation shall not take place until the historical resource is first recorded pursuant to the HABS Level II requirements.</p> <p>Any relocation activities undertaken by third parties shall be fully completed prior to the commencement of construction activities. The relocated historical resource shall be moved in accordance with all applicable regulatory requirements, including those applicable provisions of Chapter 83 of the Los Angeles</p>		

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	<p>Building Code, and shall be moved during off-peak hours so as to avoid potential traffic impacts.</p> <p>4.4-1(e) Historic American Building Survey Documentation</p> <p>If required under the mitigation plan in the historical resources evaluation prepared under MM 4.4-1(a), comply with the following measure.</p> <p>If significant historical resources are identified on a development site and avoidance or compliance with the Secretary's Standards is not possible, prior to development activities, the project applicant shall prepare a Historic American Buildings Survey (HABS) Level II documentation for the historical resource and remaining historic property setting. The HABS document shall be prepared by a qualified architectural historian, historic architect, or historic preservation professional who</p>		

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	<p>satisfies the Secretary of the Interior's PQS for History, Architectural History, or Architecture, pursuant to 36 CFR 61. This document shall record the history and architecture of the property, as well as important events or other significant contributions to the patterns and trends of history with which the property is associated, as appropriate. The property's physical condition, both historic and current, shall be documented through site plans; historic maps and photographs; original as-built drawings; large format photographs; and written data. Building exteriors, representative interior spaces, character-defining features, as well as the property setting and contextual views shall be documented. Field photographs and notes shall also be included. All documentation components shall be completed in accordance with the Secretary of the Interior's Standards and Guidelines for Architectural</p>		

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	<p>and Engineering Documentation. The HABS documentation shall be submitted to the National Park Service for transmittal to the Library of Congress, and archival copies shall be sent to the City of Los Angeles Office of Historic Resources (OHR) and Los Angeles Public Library. Per the Secretary of the Interior's Standards for Architectural and Engineering Documentation, preparation of the HABS document serves to "[provide] important information on a property's significance for use by scholars, researchers, preservationists, architects, engineers and others interested in preserving and understanding historic properties."</p> <p>4.4-2 Archaeological Resources Discretionary projects that involve ground disturbance in native soils or soils of unknown origin, shall implement the following procedures to identify archaeological resources</p>		

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	<p>located in a development site and implement applicable impact reduction techniques to reduce substantial adverse effects associated with the inadvertent discovery of archaeological resources.</p> <p>A. The project applicant shall retain a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards (PQS) in archaeology to complete a cultural resources assessment of the development site. A cultural resources assessment may include an archaeological pedestrian survey of the development site, if possible, and sufficient background archival research and field sampling to determine whether subsurface prehistoric or historic remains may be present. Archival research should include a records search conducted at the South Central Coastal Information Center (SCCIC) and a Sacred Lands File (SLF) search</p>		

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	<p>conducted with the Native American Heritage Commission (NAHC).</p> <p>B. If prehistoric or historic archaeological remains are identified as a result of the SCCIC or SLF searches, the remains shall be avoided and preserved in place where feasible.</p> <p>C. Where preservation is not feasible, each resource shall be evaluated for significance and eligibility to the California Register. Phase 2 evaluation shall include any necessary archival research to identify significant historical associations as well as mapping of surface artifacts, collection of functionally or temporally diagnostic tools and debris, and excavation of a sample of the cultural deposit to characterize the nature of the sites, define the artifact and feature contents, determine horizontal boundaries and depth below surface, and retrieve representative</p>		

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	<p>samples of artifacts and other remains.</p> <p>D. Excavation at Native American sites shall be monitored by a geographically affiliated tribal representative, as agreed upon in any formal consultation proceedings with the geographically affiliated tribe or as indicated by the NAHC. If no tribal monitor is available, the monitoring shall be done by a qualified archaeologist.</p> <p>E. Cultural materials collected from the sites shall be processed and analyzed in the laboratory according to standard archaeological procedures. The age of the remains shall be determined using radiocarbon dating and other appropriate procedures; lithic artifacts, faunal remains, and other cultural materials shall be identified and analyzed according to current professional standards.</p>		

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	<p>F. Following laboratory analysis, the significance of the sites shall be evaluated according to the criteria of the California Register. The results of the investigations shall be presented in a technical report following the standards of the California Office of Historic Preservation (OHP) publication “Archaeological Resource Management Reports: Recommended Content and Format (1990 or latest edition)” (http://ohp.parks.ca.gov/pages/1054/files/armr.pdf).</p> <p>G. Upon completion of the work, all artifacts, other cultural remains, records, photographs, and other documentation shall be curated by an appropriate curation facility. All fieldwork, analysis, report production, and curation shall be fully funded by the applicant.</p> <p>H. If the resources meet California Register significance standards, the City shall ensure that all feasible recommendations for impact</p>		

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	<p>reduction of archaeological impacts are incorporated into the final design and permits issued for development. Necessary Phase 3 data recovery excavation, conducted to exhaust the data potential of significant archaeological sites, shall be carried out by a qualified archaeologist meeting the Secretary of the Interior's PQS for archaeology according to a research design reviewed and approved by the City prepared in advance of fieldwork and using appropriate archaeological field and laboratory methods consistent with the OHP Planning Bulletin 5 (1991), Guidelines for Archaeological Research Design, or the latest edition thereof.</p> <p>I. If recommended by a cultural resources assessment, prior to issuance of a grading permit and prior to the start of any ground-disturbing activity, the applicant shall retain a qualified archaeologist who meets the</p>		

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	<p>Secretary of the Interior’s PQS to oversee an archaeological monitor who shall be present during construction excavations, such as demolition, clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the project, including peripheral activities, such as sidewalk replacement, utilities work, and landscaping, which may occur adjacent to the project site. The frequency of monitoring shall be based on the rate of excavation and grading activities, the materials being excavated (younger sediments vs. older sediments), the depth of excavation, and, if found, the abundance and type of archaeological resources encountered. Full-time monitoring may be reduced to part-time inspections, or ceased entirely, if determined adequate by the qualified archaeologist. Prior to commencement of excavation activities, Archaeological Sensitivity Training shall be</p>		

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	<p>given for construction personnel. The training session shall be carried out by the qualified archaeologist and shall focus on how to identify archaeological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event.</p> <p>J. In the event that historic (e.g., bottles, foundations, refuse dumps/privies, railroads, etc.) or prehistoric (e.g., hearths, burials, stone tools, shell and faunal bone remains, etc.) archaeological resources are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. A 50-foot buffer within which construction activities shall not be allowed to continue shall be established by the qualified archaeologist around the find. Work shall be allowed to continue outside of the buffer area. All archaeological resources</p>		

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	<p>unearthed by project development activities shall be evaluated by the qualified archaeologist. If a resource is determined by the qualified archaeologist to constitute a “historical resource” pursuant to CEQA Guidelines Section 15064.5(a) or a “unique archaeological resource” pursuant to Public Resources Code Section 21083.2(g), the qualified archaeologist shall coordinate with the applicant and the City to develop a formal treatment plan that would serve to reduce impacts to the resources. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If, in coordination with the City, it is determined that preservation in place is not feasible,</p>		

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	<p>appropriate treatment of the resource shall be developed by the qualified archaeologist in coordination with the City and may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any archaeological material collected shall be curated at a public, non-profit institution with a research interest in the materials, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be donated to a local school, Tribe, or historical society in the area for educational purposes.</p> <p>K. As applicable, the final Phase 1 Inventory, Phase 2 Testing and Evaluation, or Phase 3 Data Recovery reports shall be submitted to the City prior to issuance of construction permit. Recommendations contained therein shall be implemented</p>		

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	throughout all ground disturbance activities.		
<p>PMM CULT-2</p> <p>In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to human remains, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) In the event of discovery or recognition of any human remains during construction or excavation activities associated with the project, in any location other than a dedicated cemetery, cease further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the coroner of the county in which the remains are discovered has been informed and has determined that no investigation of the cause of death is required.</p> <p>b) If any discovered remains are of Native American origin, as determined by the county Coroner, an experienced</p>	<p>See 4.4-2 above and 4.15-1(a) and 4.15-1(b) below addressing archeological resources and discovery of potential tribal cultural resources.</p>	<p>No applicable mitigation measure.</p>	<p>As described in the SCEA, the Project Site is located within an urbanized area of the City and has been subject to grading and development in the past. No known human remains exist at the Project Site. However, should the inadvertent discovery of human remains occur in connection with Project development, the Project would be required to comply with specific regulatory measures that are equal to or more effective than the SCAG and City mitigation measures regarding human remains.</p> <p>Specifically, in the event that unknown human remains were encountered at the site, the Applicant would be required to comply with the State's Health and Safety Code Section 7050.5, which provides that in the event of discovery or recognition of any human remains at the Project Sites, no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until</p>

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<p>osteologist, or another qualified professional:</p> <ul style="list-style-type: none"> • Contact the County Coroner to contact the NAHC to designate a Native American Most Likely Descendant (MLD). The MLD should make a recommendation to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods. This may include obtaining a qualified archaeologist or team of archaeologists to properly excavate the human remains. In some cases, it is necessary for the Lead Agency, qualified archaeologist, or developer to also reach out to the NAHC to coordinate and ensure notification in the event the Coroner is not available. • If the NAHC is unable to identify a MLD, or the MLD fails to make a recommendation within 48 hours after being notified by the commission, or the landowner or his representative rejects the recommendation of the MLD and the mediation by the NAHC 			<p>the Los Angeles County Coroner has determined, in accordance with Chapter 10 (commencing with Section 27460) of Part 3 of Division 2 of Title 3 of the Government Code, that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in Section 5097.98 of the PRC. The coroner shall make his or her determination within two working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native</p>

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<p>fails to provide measures acceptable to the landowner, obtain a culturally affiliated Native American monitor, and an archaeologist, if recommended by the Native American monitor, and rebury the Native American human remains and any associated grave goods, with appropriate dignity, on the property and in a location that is not subject to further subsurface disturbance.</p>			<p>American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission (NAHC).</p> <p>Thus, pursuant to the Project's required regulatory compliance, the application of SCAG and City mitigation measures regarding human remains is not required.</p>
<p>No applicable mitigation measure.</p>	<p>4.4-1(f) Interpretive Program If required under the mitigation plan in the historical resources evaluation prepared under MM 4.4-1(a), comply with the following measure.</p> <p>If avoidance of the historical resource is not feasible, the project shall include an interpretive display located on the property which addresses the historical context and architectural or historical significance of the resource and informs the public about the history and original configuration of the property.</p>	<p>No applicable mitigation measure.</p>	<p>As described above and in the SCEA, the Project would not result in any direct impacts to any historical resources; accordingly, the application of City mitigation regarding interpretive displays is not required.</p>

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	The display shall be reviewed and approved by the City prior to installation at a site to be chosen by the City.		
No applicable mitigation measure.	<p>4.4-1(g) Construction Monitoring, Salvage, and Reuse</p> <p>If required under the mitigation plan in the historical resources evaluation prepared under MM 4.4-1(a), comply with the following measure.</p> <p>If retention of a historical resource is not feasible, and the historical resource is significant for its architectural design or construction method, the project applicant shall retain a qualified architectural historian or historic preservation professional who satisfies the Secretary of the Interior's Professional Qualifications Standards (PQS) for Architectural History to conduct construction monitoring and salvage during demolition. Any important historic fabric associated with the historical resource's period of significance shall be fully</p>	No applicable mitigation measure.	As described above and in the SCEA, the Project would not result in any direct impacts to any historical resources; accordingly, the application of City mitigation regarding salvage and reuse is not required.

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	<p>recorded in photographic images and written manuscript notes. Prior to the commencement of demolition, significant material shall be inventoried and evaluated for potential salvage, analysis, reuse, and interpretation. The qualified architectural historian or historic preservation professional shall prepare the necessary written and illustrated documentation in a construction monitoring and salvage report. This document shall record any historically significant construction methods completed during the period of significance as well as document the historical resource's present physical condition through site plans; historic maps and photographs; sketch maps; digital photography; and written data and text.</p> <p>A salvage and reuse plan shall be created, identifying elements and materials that can be saved prior to the issuance of a demolition</p>		

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	<p>permit. The plan shall be prepared by a qualified architectural historian or historic preservation professional with demonstrated experience in developing salvage and reuse plans. The plan shall be submitted to the City of Los Angeles Office of Historic Resources. Elements and materials that may be salvageable include: windows, doors, roof tiles, decorative elements, framing members, light fixtures, plumbing fixtures, and flooring materials such as tiles and hardwood. The salvageable items shall be removed in the gentlest, least destructive manner possible. The plan shall identify the recipient(s) for the items.</p> <p>All documentation components shall be completed in accordance with the Secretary of the Interior's Standards and for Archaeological Documentation for above ground structures. The completed documentation shall be placed on file at the South</p>		

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	<p>Central Coastal Information Center, California State University, Fullerton, California; and the City of Los Angeles Public Library. Findings shall be incorporated into the Historic American Buildings Survey (HABS) report.</p>		
<p>No applicable mitigation measure.</p>	<p>4.4-1(h) Temporary Protective Relocation If required under the mitigation plan in the historical resources evaluation prepared under MM 4.4-1(a), comply with the following measure.</p> <p>For projects for which development would have the potential to cause damage to a historical resource and the resource cannot be protected in place, if feasible, the resource may be temporarily relocated to prevent such damage. Prior to development, the applicant shall contact stakeholders directly via letter detailing the location of the project site, its potential impact on the resource, project timeframe, identification of the</p>	<p>No applicable mitigation measure.</p>	<p>As described above and in the SCEA, the Project would not result in any direct impacts to any historical resources; accordingly, the application of City mitigation regarding temporary protective relocation is not required.</p>

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	<p>affected resource, proposed procedures for removal resource or parts of resource with affected, where and for how long the resource would be stored, how it would be secured, and other relevant details. Photographic and documentary recordation of the potentially impacted resource shall be completed by a qualified architectural historian meeting the PQS for Architectural History. Prior to any construction or demolition activities that have the potential to damage the resource, elements that cannot be reasonably protected in place shall be carefully removed by a qualified restoration contractor. Each removed element shall be promptly stored at a secured off-site location. Following completion of project construction, reinstallation of each affected element at its original documented location shall occur [by a qualified restoration contractor] with work completed to the satisfaction of the OHR, and</p>		

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	<p>the Department of Public Works Bureau of Engineering, and other interested parties. Excavation and construction activities in the vicinity of the resource and work conducted by the restoration contractor to remove, store, and replace affected elements, shall be monitored by a qualified historic preservation consultant meeting the PQS for Architectural History and documented in a monitoring report that shall be provided to OHR.</p>		
<p>No applicable mitigation measure.</p>	<p>4.4-1(i) Excavation and Shoring Plan If required under the mitigation plan in the historical resources evaluation prepared under MM 4.4-1(a), comply with the following measure.</p> <p>For projects in which excavation and shoring have the potential to damage a historical resource in close proximity to the project site, an excavation and shoring plan shall be implemented to reduce the likelihood that earth-moving</p>	<p>No applicable mitigation measure.</p>	<p>As described above and in the SCEA, no historical resources are located on the Project Site; however, the site is adjacent to the South Carthay HPOZ and various contributing structures. In order to ensure the Project does not damage a historical resource in close proximity to the Project Site during excavation activities, the Project would implement the following mitigation measure, which has been specifically designed to account for Project-specific construction and location details, and is therefore equal to or more effective than the</p>

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	<p>activities will result in damage to the historical resource due to earth moving activities. Procedures shall be implemented for shoring system design and monitoring of pre-excavation, grading, and shoring activities:</p> <ul style="list-style-type: none"> Excavation and shoring plans and calculations for temporary shoring walls shall be prepared by a California Registered Civil Engineer experienced in the design and construction of shoring systems and hired under the excavation subcontractor. The shoring systems shall be selected and designed in accordance with all current code requirements, industry best practices, and the recommendations of the Project Geotechnical Engineer. Maximum 		<p>City mitigation regarding potential excavation and shoring impacts:</p> <p>MM-NOI-10 Pre-construction surveys shall be performed to document the existing conditions of contributing structures that are a part of the South Carthay HPOZ (“Contributing Structures”) and immediately adjacent to the Project Site. A groundborne vibration and structural/ architectural monitoring program shall be implemented and recorded during the Project’s excavation and any other phases that require the use of large earthmoving vehicles and/or vibratory rollers to ensure that groundborne vibration levels at the boundary of the Project Site adjacent to these Contributing Structures do not exceed 0.12 inches per second. The performance standards of the groundborne vibration and structural/architectural program shall include the following:</p> <ul style="list-style-type: none"> Prior to the start of construction, a detailed photographic survey shall document existing visible exterior conditions of Contributing Structures that

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	<p>allowable lateral deflections for the project site are to be developed by the Geotechnical Engineer in consideration of adjacent structures, property, and public rights-of-way. These deflection limits shall be prepared in consideration of protecting adjacent historic resources. The shoring engineer shall produce a shoring design, incorporating tie-backs, soldier piles, walers, or other means of reinforcement, that is of sufficient capacity and stiffness to meet or exceed the strength and deflection requirements.</p> <p>Calculations shall be prepared by the shoring engineer showing the anticipated lateral deflection of the shoring system and its</p>		<p>are immediately adjacent to the Project Site. Any existing exterior damage that is visible from the Project Site shall be noted.</p> <ul style="list-style-type: none"> • A vibration monitoring system shall be installed at a location that is immediately adjacent to the Project's boundary with Contributing Structures. This system shall continuously measure and store vibration velocities during periods of construction activity. The system shall provide real-time alerts to a construction supervisor or representative immediately if a vibration velocity of 0.12 inches per second is detected. • In the event that a vibration velocity of 0.12 inches per second is detected, work shall stop immediately in the vicinity of the affected area and nearby Contributing Structures. Construction activities may not resume until the source of the vibration exceedance has

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	<p>components and demonstrating that these deflections are within the allowable limits. Where tie-back anchors shall extend across property lines or encroach into the public rights-of-way, appropriate notification and approval procedures shall be followed. The final excavation and shoring plans shall include all appropriate details, material specifications, testing and special inspection requirements and shall be reviewed by the Geotechnical Engineer for conformance with the design intent and submitted to the Los Angeles Department of Building and Safety (LADBS) for review and approval during the grading permit application submission. The</p>		<p>been identified and measures have been taken to prevent vibration related damage from occurring. If necessary, feasible steps to reduce groundborne vibration levels shall be taken, such as downsizing construction equipment, reducing equipment power levels, or using less impactful techniques.</p> <p>With implementation of this Project-specific mitigation measure, incorporation of this City mitigation measure into the Project is not required.</p>

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	<p>Geotechnical Engineer shall provide on-site observation during the excavation and shoring work.</p> <ul style="list-style-type: none"> The general contractor shall hire a California Registered Professional Engineer or California Professional Land Surveyor to prepare an Adjacent Structures Construction Monitoring Plan, subject to review and approval by LADBS, prior to initiation of any excavation, grading, or shoring activities to ensure the protection of adjacent historic resources from damage due to settlement during construction and excavation. The Adjacent Structures Construction Monitoring Plan shall be carried out by a California Professional 		

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	<p>Land Surveyor and establish survey monuments and document and record through any necessary means, including video, photography, survey, etc. the initial positions of adjacent structures, sidewalks, buildings, utilities, facades, cracks, etc. to form a baseline for determining settlement or deformation. Upon installation of soldier piles, survey monuments shall be affixed to the tops of representative piles so that deflection can be measured. The shored excavation and adjacent structures, sidewalks, buildings, utilities, facades, cracks, etc. shall be visually inspected each day. Survey monuments shall be measured at critical stages of dewatering,</p>		

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	<p>excavation, shoring, and construction but shall not occur less frequently than once every 30 days. Reports shall be prepared by the California Professional Land Surveyor documenting the movement monitoring results.</p> <ul style="list-style-type: none"> • Appropriate parties shall be notified immediately, and corrective steps shall be identified and implemented if movement exceeds predetermined thresholds, calculated amounts, or if new cracks or distress are observed in adjacent structures, sidewalks, buildings, utilities, façades, etc. In the event that settlement due to excavation or construction activity causes damage requiring touch-ups or repairs to the finishes 		

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	<p>of adjacent historic buildings, that work shall be performed in consultation with a qualified preservation consultant and in accordance with the California Historical Building Code and the Secretary's Standards, as appropriate.</p> <p>Foundation systems are to be designed in accordance with all applicable loading requirements, including seismic, wind, settlement, and hydrostatic loads, as determined by the California Building Code and in accordance with the recommendations provided by the Geotechnical Engineer.</p>		
No applicable mitigation measure.	<p>4.4-1(j) Structural Construction Monitoring If required under the mitigation plan in the historical resources evaluation prepared under MM 4.4-1(a), comply with the following measure.</p>	No applicable mitigation measure.	As described above and in the SCEA, no historical resources are located on the Project Site; however, the site is adjacent to the South Carthay HPOZ and various contributing structures. In order to ensure the Project does not damage a historical resource in close proximity to the Project Site during

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	<p>For developments in which excavation and shoring have the potential to damage a historical resource in close proximity to the project site, construction monitoring shall be implemented to minimize damage to nearby historical resources. The construction monitoring shall be performed by a licensed structural engineer with at least five years of demonstrated experience in rehabilitating historic buildings of similar size. A survey of the existing foundations and other structural aspects of historical resources in close proximity to the site shall be conducted to establish baseline conditions and provide a shoring design to protect the historical resources from potential damage. The survey shall take place prior to any construction activities. Pot holing or other destructive testing of the below grade conditions on the development site and immediately adjacent to the nearby historical resources may be necessary to establish baseline conditions</p>		<p>excavation activities, the Project would implement mitigation measure MM-NOI-10 (shown above), which is equal to or more effective than the City's mitigation measure regarding structural construction monitoring. With implementation of this Project-specific mitigation measure, which takes into consideration the specific construction and location details of the proposed development, incorporation of the City mitigation measure into the Project is not required.</p>

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	<p>and prepare the shoring design. A construction monitor shall submit to OHR a pre-construction survey that establishes baseline conditions to be monitored during construction, prior to issuance of any building permit for the development. The monitoring process shall include a meeting with the project contractor prior to the demolition and/or excavation activities to discuss minimizing damage to historical resources in close proximity.</p>		
Geology and Soils			
<p>PMM-GEO-1</p> <p>In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Consistent with the CBC and local regulatory agencies with oversight of</p>	<p>See 4.8-1 below.</p>	<p>No applicable mitigation measure.</p>	<p>The Project would be required to comply with regulations that are equal to or more effective than mitigation measures identified by SCAG and the City. Specifically, the Applicant would be required by the City to implement the provisions of the South Coast Air Quality Management District's (SCAQMD) Rule 403 – Fugitive Dust to minimize wind and water-borne erosion at the site. Also, the Applicant would be required to prepare and implement a Stormwater Pollution Prevention Plan (SWPPP), in accordance with</p>

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<p>development associated with the Plan, ensure that site-specific geotechnical investigations conducted by a qualified geotechnical expert are conducted to ascertain soil types prior to preparation of project designs. These investigations can and should identify areas of potential failure and recommend remedial geotechnical measures to eliminate any problems.</p> <p>b) Consistent with the requirements of the State Water Resources Control Board (SWRCB) for projects over one acre in size, obtain coverage under the General Construction Activity Storm Water Permit (General Construction Permit) issued by the SWRCB and prepare a stormwater pollution prevention plan (SWPPP) and submit the plan for review and approval by the Regional Water Quality Control Board (RWQCB). At a minimum, the SWPPP should include a description of construction materials, practices, and equipment storage and maintenance; a list of pollutants likely to contact stormwater; site-specific erosion and sedimentation control practices; a list of provisions to eliminate or reduce discharge of materials to stormwater; best management practices (BMPs);</p>			<p>the National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities. The site-specific SWPPP would be prepared prior to any ground-disturbing activities and would be implemented during Project construction. The SWPPP would include best management practices (BMPs) and erosion control measures to prevent pollution in storm water discharge. Typical BMPs that could be used during construction include good-housekeeping practices (e.g., street sweeping, proper waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, proper handling and storage of hazardous materials, etc.) and erosion/sediment control measures (e.g., silt fences, fiber rolls, gravel bags, storm water inlet protection, and soil stabilization measures, etc.). The SWPPP would be subject to review and approval by the City for compliance with the City's Development Best</p>

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<p>and an inspection and monitoring program.</p> <p>c) Consistent with the requirements of the SWRCB and local regulatory agencies with oversight of development associated with the Plan, ensure that project designs provide adequate slope drainage and appropriate landscaping to minimize the occurrence of slope instability and erosion. Design features should include measures to reduce erosion caused by storm water. Road cuts should be designed to maximize the potential for revegetation.</p> <p>d) Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that, prior to preparing project designs,</p>			<p>Management Practices Handbook, Part A, Construction Activities. Additionally, all Project construction activities would comply with the City's grading permit regulations, which require the implementation of grading and dust control measures, including a wet weather erosion control plan if ground-disturbing activities occur during a rainy season, as well as inspections to ensure that sedimentation and erosion is minimized. Through compliance with these existing regulations, the Project would not result in any significant impacts related to soil erosion during ground-disturbing activities. Additionally, during the Project's operational phase, most of the Project Site would be developed with impervious surfaces, and all stormwater flows would be directed to storm drainage features and would not come into contact with bare soil surfaces. Compliance with these existing regulations, which are equal to or more effective than the relevant mitigation measures identified by SCAG and the City, would ensure that no significant impacts regarding soil erosion and loss of topsoil would</p>

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			occur; therefore, incorporation of these SCAG and City mitigation measures into the Project is not required.
<p>PMM GEO-2</p> <p>In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to paleontological resources. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Ensure compliance with the Paleontological Resources Preservation Act, the Federal Land Policy and Management Act, the Antiquities Act, Section 5097.5 of the Public Resources Code (PRC), adopted county and city general plans, and other federal, state and local regulations, as applicable and feasible, by adhering to and incorporating the performance standards and practices from the 2010 Society for Vertebrate Paleontology (SVP) standard procedures for the assessment and mitigation of adverse impacts to paleontological resources.</p>	<p>4.5-1(a) Paleontological Procedures for Discretionary Projects</p> <p>For all discretionary projects that involve excavation or grading activities at depths greater than previous disturbance on the respective site(s), prior to the start of construction, the following shall be conducted as discussed in detail below: prepare a resource assessment and records search for the presence of paleontological resources to determine if the project site is underlain by paleontological resources; monitor all excavation and grading activities in areas underlain by soils or geologic units potentially containing paleontological resources; and identify, record, and evaluate all paleontological resources uncovered during project construction and submit a</p>	<p>No applicable mitigation measure.</p>	<p>As described in the SCEA, the Project Site is located within an urbanized area of the City and has been subject to grading and development in the past. A records search was conducted with the Los Angeles County Natural History Museum to determine the likelihood of unique paleontological resources to occur at the Project Site (see SCEA Appendix E-3). The records search revealed that no paleontological resources are known to exist at the Project Site; however, resources are known to exist in the Project Site area in the same sedimentary deposits found at the Project Site, and therefore, there is a potential for inadvertent discovery of paleontological resources. However, the Project would implement Mitigation Measure MM GEO-1, which is equal to or more effective than SCAG's or the Housing Element's mitigation, and which would ensure that Project impacts on unknown paleontological</p>

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<p>b) Obtain review by a qualified paleontologist (e.g. who meets the SVP standards for a Principal Investigator or Project Paleontologist or the Bureau of Land Management (BLM) standards for a Principal Investigator), to determine if the project has the potential to require ground disturbance of parent material with potential to contain unique paleontological or resources, or to require the substantial alteration of a unique geologic feature. The assessment should include museum records searches, a review of geologic mapping and the scientific literature, geotechnical studies (if available), and potentially a pedestrian survey, if units with paleontological potential are present at the surface.</p> <p>c) Avoid exposure or displacement of parent material with potential to yield unique paleontological resources.</p> <p>d) Where avoidance of parent material with the potential to yield unique paleontological resources is not feasible:</p> <ol style="list-style-type: none"> 1. All on-site construction personnel receive Worker Education and Awareness Program (WEAP) training prior to the commencement of excavation work to understand the regulatory framework that 	<p>paleontological assessment report to the City for review and approval. In addition, during project construction, the following shall be conducted as discussed in detail below: cease all construction activities in the event of the discovery of paleontological resources; conduct fossil recovery as necessary by a qualified paleontologist; avoid handling of paleontological resources by parties other than the qualified paleontologist responsible for conducting fossil recovery; and resume construction activities only upon clearance by the qualified paleontologist. These procedures, as detailed below, shall be implemented to avoid impacts to paleontological resources or reduce potential impacts to a less-than-significant level:</p> <ul style="list-style-type: none"> • Prior to excavation and grading activities, a qualified paleontologist shall prepare a resource assessment and records search for the potential presence 		<p>resources would be less than significant.</p> <p>MM-GEO-1 Inadvertent Discovery of Paleontological Resources In the event that potential paleontological resources are encountered during the Project's ground-disturbing activities, all work within 50 feet of the potential discovery shall cease, and a qualified paleontologist (Project Paleontologist), who meets the Secretary of Vertebrate Paleontology (SVP) standards, has experience working with asphaltic fossil deposits, and is approved by the Natural History Museum of Los Angeles County (LACM), shall be retained. If deemed necessary by the Project Paleontologist, a Paleontological Resources Monitoring and Mitigation Plan (PRMMP) shall be prepared. This plan will address specifics of monitoring and mitigation and will comply with the recommendations of the SVP's Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. This plan (if deemed necessary) will be subject to the</p>

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<p>provides for protection of paleontological resources and become familiar with diagnostic characteristics of the materials with the potential to be encountered.</p> <p>2. A qualified paleontologist prepares a Paleontological Resource Management Plan (PRMP) to guide the salvage, documentation and repository of unique paleontological resources encountered during construction. The PRMP should adhere to and incorporate the performance standards and practices from the 2010 SVP Standard procedures for the assessment and mitigation of adverse impacts to paleontological resources. If unique paleontological resources are encountered during construction, use a qualified paleontologist to oversee the implementation of the PRMP.</p> <p>3. Monitor ground disturbing activities in parent material, with a moderate to high potential to yield unique paleontological resources using a qualified</p>	<p>of paleontological resources. This assessment shall be informed by records from the Natural History Museum of Los Angeles County.</p> <ul style="list-style-type: none"> If the assessment determines the project site is underlain by soils or geologic units with a medium to high potential for containing paleontological resources, a qualified paleontologist shall prepare a monitoring plan, and worker education plan. The paleontologist's assessment and any required monitoring or required worker education plan shall be submitted to the City for review and approval prior to the commencement of construction activities. Any monitoring plan shall include requiring compliance with 		<p>approval of the LACM and submitted to them for review before ground disturbance begins.</p> <p>The Project Paleontologist shall develop a Worker's Environmental Awareness Program (WEAP) to train the construction crew on the legal requirements for preserving fossil resources as well as procedures to follow in the event of a fossil discovery. This training program shall be given to the crew before ground-disturbing work commences and will include handouts to be given to new workers as needed.</p> <p>All ground disturbances at the Project Site that occur in previously undisturbed older alluvial sediments that have high paleontological potential shall require monitoring. Monitoring shall be conducted by a Paleontological Monitor, who meets the standards defined in the SVP's Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. Should asphaltic sediments be encountered during excavations, the monitor must also</p>

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<p>paleontological monitor meeting the standards of the SVP or the BLM to determine if unique paleontological resources are encountered during such activities, consistent with the specified or comparable protocols.</p> <p>4. Identify where ground disturbance is proposed in a geologic unit having the potential for containing fossils and specify the need for a paleontological monitor to be present during ground disturbance in these areas.</p> <p>e) Avoid routes and project designs that would permanently alter unique geological features.</p> <p>f) Salvage and document adversely affected resources sufficient to support ongoing scientific research and education.</p> <p>g) Significant recovered fossils should be prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility.</p> <p>h) Following the conclusion of the paleontological monitoring, the qualified paleontologist should prepare a report</p>	<p>Mitigation Measure 4.5-1(d) for discovery, salvage and treatment.</p> <p>4.5-1(b) Worker Environmental Awareness Program, Fossil Salvage, and Construction Monitoring</p> <p>If required by cultural resources assessment under MM 4.5-1(a), prior to the start of construction, a paleontological monitor shall conduct training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction staff, and notice that the identified qualified paleontologist is the only one authorized to handle paleontological find(s), including but not limited to collection and removal. Approved plans shall include statement of WEAP requirement.</p> <p>4.5-1(c) Construction Monitoring</p>		<p>have prior experience or training working in asphaltic sediments and meet the approval of the LACM. Monitoring shall be conducted in accordance with the PRMMP and under the supervision of the Project Paleontologist. The Project Paleontologist may periodically inspect construction activities to adjust the level of monitoring in response to subsurface conditions. Full-time monitoring can be reduced to part-time inspections or ceased entirely if determined adequate by the Project Paleontologist and the LACM. Paleontological monitoring shall include inspection of exposed sedimentary units during active excavations within sensitive geologic sediments. The monitor shall have authority to temporarily divert activity away from exposed fossils to evaluate the significance of the find and, should the fossils be determined significant, professionally and efficiently recover the fossil specimens and collect associated data. Paleontological monitors shall record pertinent geologic data and collect appropriate sediment samples from any fossil localities. When</p>

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<p>stating that the paleontological monitoring requirement has been fulfilled and summarize the results of any paleontological finds. The report should be submitted to the lead CEQA and the repository curating the collected artifacts, and should document the methods and results of all work completed under the PRMP, including treatment of paleontological materials, results of specimen processing, analysis, and research, and final curation arrangements.</p>	<p>If required pursuant to a monitoring plan prepared under MM 4.5-1(a), a paleontologist or designated paleontological monitor shall monitor ground disturbance activities, including the initial five feet below the ground surface, as areas with high paleontological sensitivity may contain resources at shallow depths and within the first five feet. If the paleontological monitor determines that full-time monitoring is no longer warranted, he or she may recommend that monitoring be reduced to periodic spot-checking or cease entirely. Monitoring shall be reinstated if any new or unforeseen deeper ground disturbances are required. After ground disturbing activities are completed, the paleontologist or designated monitor shall complete and submit a report to the City verifying compliance with the monitoring plan. Monitoring plan shall show on the plans.</p>		<p>monitoring work is completed, the Project Paleontologist shall prepare a report of the findings of the monitoring plan after construction is completed.</p> <p>In the event of a fossil discovery, whether by the paleontological monitor or a member of the construction crew, all work shall cease in a 50-foot radius of the find while the Project Paleontologist assesses the significance of the fossil and document its discovery. Should the fossil be determined significant, it shall be salvaged following the procedures and guidelines of the SVP and in consultation with the LACM. Recovered fossils shall be prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility. The most likely repository is the LACM, and a repository agreement shall be identified and a curatorial arrangement shall be signed prior to collection of the fossils.</p>

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	<p>4.5-1(d) Fossil Discovery, Salvage, and Treatment</p> <p>All discretionary projects shall be subject to the following mitigation measure:</p> <p>Discovery. If paleontological resources are uncovered during construction activities (in either a previously disturbed or undisturbed area), all ground-disturbing activities in the area of the find shall cease until a qualified paleontologist has evaluated the find, and identified and prepared an appropriate mitigation plan, in accordance with federal, state, and local guidelines, Construction activities in the area of the discovery shall commence again only after the identified resource(s) are properly processed by a qualified paleontologist, and if construction activities are cleared by the qualified paleontologist to continue. If cleared by the qualified paleontologist, construction activity may continue unimpeded on other portions of</p>		<p>With implementation of these measures, the Project would not result in any direct impacts to any paleontological resources. These measures are equal to or more effective than the SCAG and City mitigation measures regarding potential impacts to paleontological resources; accordingly, the application of SCAG and City mitigation is not required.</p>

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	<p>the project site that would not affect evaluation or recovery of the identified resource(s).</p> <p>Fossil Salvage and Treatment. The qualified paleontologist or designated paleontological monitor shall recover intact fossils consistent with the mitigation plan and notify the City of any fossil salvage and recovery efforts. Typically, fossils can be safely salvaged quickly by a single paleontologist and not disrupt construction activity. In some cases, larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. In this case the paleontologist shall have the authority to temporarily direct, divert or halt construction activity to ensure that the fossil(s) can be removed in a safe and timely manner. Any fossils shall be handled and deposited consistent with a mitigation plan prepared by the paleontological monitor. The</p>		

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	<p>qualified paleontologist shall prepare a report according to current professional standards including those of the SVP that describes the resource, how it was assessed, and disposition. The report shall be submitted to the City.</p> <p>The requirements in this mitigation measure shall be shown on plans.</p>		
Greenhouse Gases			
<p>PMM-GHG-1</p> <p>In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to greenhouse gas emissions, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Integrate green building measures consistent with CALGreen (California Building Code Title 24), local building codes and other applicable laws, into project design including:</p>	<p>See City's Air Quality measures above.</p>	<p>No applicable mitigation measure.</p>	<p>As described in the SCEA, Air Quality and Greenhouse Gas Emissions Technical Modeling was prepared for the Project (see SCEA Appendix B). As demonstrated by the SCEA, the Project's generation of GHG emissions would not conflict with an applicable plan, policy, or regulation adopted for the purposes of reducing GHG emissions, and therefore, the Project's GHG impacts would be less than significant, and no mitigation is required. Accordingly, no relevant mitigation from SCAG or the City regarding GHG emissions need be incorporated into the Project.</p>

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<ul style="list-style-type: none"> i) Use energy efficient materials in building design, construction, rehabilitation, and retrofit. ii) Install energy-efficient lighting, heating, and cooling systems (cogeneration); water heaters; appliances; equipment; and control systems. iii) Reduce lighting, heating, and cooling needs by taking advantage of light-colored roofs, trees for shade, and sunlight. iv) Incorporate passive environmental control systems that account for the characteristics of the natural environment. v) Use high-efficiency lighting and cooking devices. vi) Incorporate passive solar design. vii) Use high-reflectivity building materials and multiple glazing. viii) Prohibit gas-powered landscape maintenance equipment. ix) Install electric vehicle charging stations. x) Reduce wood burning stoves or fireplaces. 			

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<p>xi) Provide bike lanes accessibility and parking at residential developments.</p> <p>b) Reduce emissions resulting from projects through implementation of project features, project design, or other measures, such as those described in Appendix F of the State CEQA Guidelines.</p> <p>c) Include off-site measures to mitigate a project's emissions.</p> <p>d) Measures that consider incorporation of Best Available Control Technology (BACT) during design, construction and operation of projects to minimize GHG emissions, including but not limited to:</p> <ul style="list-style-type: none"> i) Use energy and fuel-efficient vehicles and equipment; ii) Deployment of zero- and/or near zero emission technologies; iii) Use lighting systems that are energy efficient, such as LED technology; iv) Use the minimum feasible amount of GHG-emitting construction materials; v) Use cement blended with the maximum feasible amount of flash or other materials that reduce GHG emissions from cement production; 			

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<p>vi) Incorporate design measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse;</p> <p>vii) Incorporate design measures to reduce energy consumption and increase use of renewable energy;</p> <p>viii) Incorporate design measures to reduce water consumption;</p> <p>ix) Use lighter-colored pavement where feasible;</p> <p>x) Recycle construction debris to maximum extent feasible;</p> <p>xi) Plant shade trees in or near construction projects where feasible; and</p> <p>xii) Solicit bids that include concepts listed above.</p> <p>e) Measures that encourage transit use, carpooling, bike-share and car-share programs, active transportation, and parking strategies, including, but not limited to the following:</p> <p>i) Promote transit-active transportation coordinated strategies;</p> <p>ii) Increase bicycle carrying capacity on transit and rail vehicles;</p>			

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<ul style="list-style-type: none"> iii) Improve or increase access to transit; iv) Increase access to common goods and services, such as groceries, schools, and day care; v) Incorporate affordable housing into the project; vi) Incorporate the neighborhood electric vehicle network; vii) Orient the project toward transit, bicycle and pedestrian facilities; viii) Improve pedestrian or bicycle networks, or transit service; ix) Provide traffic calming measures; x) Provide bicycle parking; xi) Limit or eliminate park supply through; <ul style="list-style-type: none"> i. Elimination (or reduction) of minimum parking requirements ii. Creation of maximum parking requirements iii. Provision of shared parking. xii) Unbundle parking costs; xiii) Provide parking cash-out programs; 			

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<p>xiv) Implement or provide access to commute reduction program;</p> <p>f) Incorporate bicycle and pedestrian facilities into project designs, maintaining these facilities, and providing amenities incentivizing their use; and planning for and building local bicycle projects that connect with the regional network;</p> <p>g) Improving transit access to rail and bus routes by incentives for construction of transit facilities within developments, and/or providing dedicated shuttle service to transit stations; and</p> <p>h) Adopting employer trip reduction measures to reduce employee trips such as vanpool and carpool programs, providing end-of-trip facilities, and telecommuting programs including but not limited to measures that:</p> <ul style="list-style-type: none"> i) Provide car-sharing, bike sharing, and ride-sharing programs; ii) Provide transit passes; iii) Shift single occupancy vehicle trips to carpooling or vanpooling, for example providing ride-matching services; iv) Provide incentives or subsidies that increase that use 			

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<p>of modes other than single-occupancy vehicle;</p> <p>v) Provide on-site amenities at places of work, such as priority parking for carpools and vanpools, secure bike parking, and showers and locker rooms;</p> <p>vi) Provide employee transportation coordinators at employment sites;</p> <p>vii) Provide a guaranteed ride home service to users of non-auto modes.</p> <p>i) Designate a percentage of parking spaces for ride-sharing vehicles or high-occupancy vehicles, and provide adequate passenger loading and unloading for those vehicles;</p> <p>j) Land use siting and design measures that reduce GHG emissions, including:</p> <ul style="list-style-type: none"> i) Developing on infill and brownfields sites; ii) Building compact and mixed-use developments near transit; iii) Retaining on-site mature trees and vegetation, and planting new canopy trees; iv) Measures that increase vehicle efficiency, encourage use of zero and low emissions vehicles, or reduce the carbon content of fuels, including 			

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<p>constructing or encouraging construction of electric vehicle charging stations or neighborhood electric vehicle networks, or charging for electric bicycles; and</p> <p>v) Measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse.</p> <p>k) Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities. The measures provided above are also intended to be applied in low income and minority communities as applicable and feasible.</p> <p>l) Require at least five percent of all vehicle parking spaces include electric vehicle charging stations, or at a minimum, require the appropriate infrastructure to facilitate sufficient electric charging for passenger vehicles and trucks to plug-in.</p> <p>m) Encourage telecommuting and alternative work schedules, such as:</p> <ul style="list-style-type: none"> i) Staggered starting times ii) Flexible schedules iii) Compressed work weeks <p>n) Implement commute trip reduction marketing, such as:</p>			

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<ul style="list-style-type: none"> i) New employee orientation of trip reduction and alternative mode options ii) Event promotions iii) Publications o) Implement preferential parking permit program p) Implement school pool and bus programs q) Price workplace parking, such as: <ul style="list-style-type: none"> i) Explicitly charging for parking for its employees; ii) Implementing above market rate pricing; iii) Validating parking only for invited guests; iv) Not providing employee parking and transportation allowances; and v) Educating employees about available alternatives. 			
Hazards and Hazardous Materials			
<p>PMM HAZ-1</p> <p>In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to the routine transport,</p>	<p>No applicable mitigation measure.</p>	<p>No applicable mitigation measure.</p>	<p>As described in the SCEA, the Project's construction activities could result in removal of contaminated soils; in addition, dewatering may occur. Taking into the consideration the Project Site-specific analysis conducted for the SCEA, Project- and impact-specific mitigation measures (Mitigation</p>

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<p>use, or disposal of hazardous materials, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Where the construction or operation of projects involves the transport of hazardous material, provide a written plan of proposed routes of travel demonstrating use of roadways designated for the transport of such materials.</p> <p>b) Specify Project requirements for interim storage and disposal of hazardous materials during construction and operation. Storage and disposal strategies must be consistent with applicable federal, state, and local statutes and regulations. Specify the appropriate procedures for interim storage and disposal of hazardous materials, anticipated to be required in support of operations and maintenance activities, in conformance with applicable federal, state, and local statutes and regulations, in the business plan for projects as applicable and appropriate.</p> <p>c) Submit a Hazardous Materials Business/Operations Plan for review and approval by the appropriate local agency. Once approved, keep the plan on file with the Lead Agency (or other</p>			<p>Measure MM-HAZ-1 and MM-HAZ-2) have been identified and will be implemented to ensure that potential impacts associated with the Project's soil removal and dewatering activities would be less than significant.</p> <p>MM-HAZ-1 Soil Management Plan A Soil Management Plan (SMP) shall be prepared for the proposed construction activities. The SMP shall describe the management of impacted soils which may be encountered during Site development, and outline health and safety procedures to minimize risk to onsite workers and personnel. In addition, the SMP shall describe the procedures for export of inert soil for offsite reuse. It is anticipated that data collected during the Phase II investigation and additional confirmation samples collected during construction shall be used to facilitate the export of inert soil for offsite reuse.</p> <p>The SMP will be developed by a qualified environmental consultant for the site and implemented during site grading and excavation. The</p>

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<p>appropriate government agency) and update, as applicable. The purpose of the Hazardous Materials Business/Operations Plan is to ensure that employees are adequately trained to handle the materials and provides information to the local fire protection agency should emergency response be required. The Hazardous Materials Business/Operations Plan should include the following:</p> <ul style="list-style-type: none"> • The types of hazardous materials or chemicals stored and/or used on-site, such as petroleum fuel products, lubricants, solvents, and cleaning fluids. • The location of such hazardous materials. • An emergency response plan including employee training information. • A plan that describes the way these materials are handled, transported and disposed. <p>d) Follow manufacturer's recommendations on use, storage, and disposal of chemical products used in construction.</p> <p>e) Avoid overtopping construction equipment fuel gas tanks.</p>			<p>SMP would be reviewed by appropriate oversight agencies as follows.</p> <p>First, a draft version of a complete SMP prepared by a qualified environmental consultant would be submitted to the LAFD for review and comment. At the discretion of the LAFD, the draft SMP may also be provided to other expert agencies, including the Los Angeles County Fire Department Site Mitigation Unit of the Health Hazardous Materials Division (LACFD SMU), the Los Angeles Regional Water Quality Control Board (Water Board), and/or the Department of Toxic Substances Control (DTSC), should the LAFD determine such review is appropriate.</p> <p>Should the LAFD determine it is necessary, it would provide comments on the draft SMP to the applicant. Additional comments may be provided by the LACFD SMU, the Water Board, or the DTSC, upon the request of the LAFD and the determination by any such agencies that comments are warranted. All</p>

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<p>f) Properly contain and remove grease and oils during routine maintenance of construction equipment.</p> <p>g) Properly dispose of discarded containers of fuels and other chemicals.</p> <p>h) Prior to shipment remove the most volatile elements, including flammable natural gas liquids, as feasible.</p> <p>i) Identify and implement more stringent tank car safety standards.</p> <p>j) Improve rail transportation route analysis, and modification of routes based on that analysis.</p> <p>k) Use the best available inspection equipment and protocols and implement positive train control.</p> <p>l) Reduce train car speeds to 40 miles per hour when passing through urbanized areas of any size.</p> <p>m) Limit storage of crude oil tank cars in urbanized areas of any size and provide appropriate security in storage yards for all shipments.</p> <p>n) Notify in advance county and city emergency operations offices of all crude oil shipments, including a contact number that can provide real-time information in the event of an oil train derailment or accident.</p> <p>o) Report quarterly hazardous commodity flow information, including classification and characterization of</p>			<p>such comments, to the extent the agencies determine comments are warranted, would be incorporated into the final draft SMP. The SMP would then be implemented during the soil disturbance and site grading phases of Project construction.</p> <p>The objective of the SMP is to establish policy and requirements for the management and disposal of soils generated during excavation and redevelopment, and other activities that may disturb potentially contaminated soil. The SMP will address the following elements:</p> <ul style="list-style-type: none"> • Specify soil-handling controls required for complying with local, state and federal overseeing agencies. • Prevent unacceptable exposure to contaminated soil. • Prevent the improper disposal of contaminated soils. • Specify the process for identifying, segregating, profiling and disposing of any stained/strong odor soil. • Specify the soil monitoring requirements during removal of previously identified subsurface structures to visually observe the subsurface conditions following

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<p>materials being transported, to all first response agencies (49 Code Fed. Regs. 15.5) along the mainline rail routes used by trains carrying crude oil identified.</p> <p>p) Fund training and outfitting emergency response crews that includes the cost of backfilling personnel while in training.</p> <p>q) Undertake annual emergency responses scenario/field based training including Emergency Operations Center Training activations with local emergency response agencies.</p>			<p>removal and to collect soil samples from the excavation depth and sidewalls as necessary to evaluate the soil for the presence of any contaminants of concern (COCs).</p> <ul style="list-style-type: none"> • Specify soil monitoring requirements in the event that stained or odorous soils are encountered if any other areas during excavation activities. • Specify procedures if any unknown subsurface structures such as USTs, clarifiers, vaults, conduits, or piping are encountered. This may include stopping work, notifying the Environmental Consultant, sampling and analyzing for potential hazardous chemicals, providing recommendations for proper disposal. • In the event that odorous or discolored soils are identified in accordance with the standards set forth in Rule 1166, Rule 1166 may require the presence onsite during construction activities of a qualified soil monitor to continuously monitor air emissions and record measurements at 15-minute intervals using a direct reading organic vapor analyzer (OVA).

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			<ul style="list-style-type: none"> • If it is determined that soil exceeding contamination levels for TPH is identified, in accordance with Rule 1166, the following steps will be taken per the SMP: <ul style="list-style-type: none"> o All monitoring would be conducted at a distance no more than 3 inches above the soil surface using an OVA. o Monitoring would be initially conducted at a minimum frequency of one reading every 15 minutes. o Upon detection of TPH exceeding contamination levels, monitoring would be conducted at a minimum rate of one reading for every five cubic yards excavated. o Upon detection of TPH exceeding contamination levels, or stained and odorous soils, excavation activities would stop in the vicinity. Representative soil sample(s) would be obtained for analysis. o The SCAQMD would be notified with 24 hours of the first detection of TPH

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			<p>exceeding contamination levels.</p> <ul style="list-style-type: none"> o Soil samples would be collected for characterization and disposal determination. o All contaminated soil would be segregated and removed from the site to an approved treatment/disposal facility. <p>At the conclusion of the proposed excavation activities and upon reaching the proposed redevelopment excavation depth, final confirmation soil samples will be collected to confirm the field readings.</p> <ul style="list-style-type: none"> • In the event that soil TPH exceeding contamination levels is still present at the proposed excavation depth, additional excavation activities would continue per the SMP (and in accordance with Rule 1166). The additional excavation activities would continue until TPH is below contamination levels. At that time, final confirmation soil samples will again be collected to confirm the field readings.

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			<p>MM-HAZ-2 Dewatering Treatment System</p> <p>Since building construction at the Site requires dewatering, a dewatering contractor shall be retained to design a treatment system to discharge to groundwater during construction pursuant to applicable Los Angeles Regional Water Quality Control Board requirements.</p> <p>With implementation of the above Project-specific mitigation measures, which are equal to or more effective than the mitigation identified by SCAG, potential hazards-related impacts would be less than significant. Accordingly, no relevant mitigation from SCAG regarding hazardous materials need be incorporated into the Project.</p>
<p>PMM HAZ-2</p> <p>In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce hazards related to the reasonably foreseeable upsets and</p>	<p>No applicable mitigation measure.</p>	<p>No applicable mitigation measure.</p>	<p>As described in the SCEA, the Project does not include the shipment of flammable liquids and other hazardous materials and does not include any rail transportation; accordingly, no impacts regarding these hazards issues would occur, and no relevant mitigation from SCAG regarding hazardous</p>

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<p>accidents involving the release of hazardous materials, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: Require implementation of safety standards regarding transport of hazardous materials, including but not limited to the following:</p> <ul style="list-style-type: none"> a) Removal of the most volatile elements, including flammable natural gas liquids, prior to shipment; b) More stringent tank car safety standards; c) Improved rail transportation route analysis, and modification of routes based on that analysis; d) Utilization of the best available inspection equipment and protocols, and implementation of positive train control; e) Reduced train car speeds to 40 miles per hour when passing through urbanized areas of any size; f) Limitations on storage of hazardous materials tank cars in urbanized areas of any size and provide appropriate security in storage yards for all shipments; g) Advance notification to county and city emergency operations offices of all crude oil and hazardous materials shipments, including a contact number 			<p>materials need be incorporated into the Project.</p>

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<p>that can provide real-time information in the event of an oil train derailment or accident;</p> <p>h) Quarterly hazardous commodity flow information, including classification and characterization of materials being transported, to all first response agencies (49 Code Fed. Regs. 15.5) along the mainline rail routes used by trains carrying hazardous materials.</p>			
<p>PMM HAZ-3</p> <p>In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to the release of hazardous materials within one-quarter mile of schools, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Where the construction and operation of projects involves the transport of hazardous materials, avoid transport of such materials within one-quarter mile of schools, when school is in session, wherever feasible.</p>	<p>No applicable mitigation measure.</p>	<p>No applicable mitigation measure.</p>	<p>As described in the SCEA, the Pressman Education Center and Academy and the St. Mary Magdalen Catholic school are located within 0.25 miles of the Project Site. However, the Project is a typical mixed-use (residential and commercial) development that would not emit or handle hazardous materials, and therefore, potential impacts relating to the release of hazardous materials in proximity to a school would be less than significant. Accordingly, no relevant mitigation from SCAG regarding hazardous materials need be incorporated into the Project.</p>

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b) Where it is not feasible to avoid transport of hazardous materials, within one-quarter mile of schools on local streets, provide notifications of the anticipated schedule of transport of such materials.			
<p>PMM HAZ-4</p> <p>In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to projects that are located on a site which is included on the Cortese List, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) For any listed sites or sites that have the potential for residual hazardous materials as a result of historic land uses, complete a Phase I Environmental Site Assessment, including a review and consideration of data from all known databases of contaminated sites, during the process of planning, environmental clearance, and construction for projects.</p> <p>b) Where warranted due to the known presence of contaminated materials,</p>	<p>4.7-2a Environmental Site Assessment</p> <p>(1) Applicability Threshold. Discretionary projects that require grading, excavation, or building permit from LADBS and which meet the criteria below shall comply with the standard in (2):</p> <ul style="list-style-type: none"> • Located on or within 500 feet of a Hazardous Material site listed on the following databases: <ul style="list-style-type: none"> ○ SWRCB GeoTracker (refer to https://geotracker.waterboards.ca.gov); ○ DTSC EnviroStor (refer to https://www.e 	No applicable mitigation measure.	<p>As described in the SCEA, Phase I and Phase II Environmental Site Assessments were prepared for the Project. The Project Site is not included on any list compiled pursuant to Government Code Section 65962.5; moreover, based on the findings of the Phase I and II reports, Project-specific mitigation measures MM-HAZ-1 and MM-HAZ-2 (provided above) would be implemented for the Project, and would reduce potential impacts pertaining to Project-related soil removal and dewatering to a less than significant level.</p> <p>With implementation of these mitigation measures, which are equal to or more effective than the mitigation identified by SCAG and the City, Project impacts related to risk of upset, contaminated soil, and potentially contaminated groundwater would be less than</p>

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<p>submit to the appropriate agency responsible for hazardous materials/wastes oversight a Phase II Environmental Site Assessment report if warranted by a Phase I report for the project site. The reports should make recommendations for remedial action, if appropriate, and be signed by a Registered Environmental Assessor, Professional Geologist, or Professional Engineer.</p> <p>c) Implement the recommendations provided in the Phase II Environmental Site Assessment report, where such a report was determined to be necessary for the construction or operation of the project, for remedial action.</p> <p>D) Submit a copy of all applicable documentation required by local, state, and federal environmental regulatory agencies, including but not limited to: permit applications, Phase I and II Environmental Site Assessments, human health and ecological risk assessments, remedial action plans, risk management plans, soil management plans, and groundwater management plans.</p> <p>e) Conduct soil sampling and chemical analyses of samples, consistent with the protocols established by the U.S. EPA to determine the extent of potential</p>	<p>nvirostor.dtsc.ca.gov/public);</p> <ul style="list-style-type: none"> o DTSC Hazardous Waste Tracking System (refer to https://hwts.dtsc.ca.gov); o LAFD Certified Unified Program Agency (refer to the active, inactive, and historical inventory lists at https://www.lafd.org/fire-prevention/cupa/public-records); o Los Angeles County Fire Department Health Hazardous Materials Division (refer to the active 		<p>significant. Accordingly, no relevant mitigation from SCAG or the City regarding hazardous materials need be incorporated into the Project.</p>

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<p>contamination beneath all underground storage tanks (USTs), elevator shafts, clarifiers, and subsurface hydraulic lifts when on-site demolition or construction activities would potentially affect a particular development or building.</p> <p>f) Consult with the appropriate local, state, and federal environmental regulatory agencies to ensure sufficient minimization of risk to human health and environmental resources, both during and after construction, posed by soil contamination, groundwater contamination, or other surface hazards including, but not limited to, underground storage tanks, fuel distribution lines, waste pits and sumps.</p> <p>g) Obtain and submit written evidence of approval for any remedial action if required by a local, state, or federal environmental regulatory agency.</p> <p>h) Cease work if soil, groundwater, or other environmental medium with suspected contamination is encountered unexpectedly during construction activities (e.g., identified by odor or visual staining, or if any underground storage tanks, abandoned drums, or other hazardous materials or wastes are encountered), in the vicinity of the suspect material. Secure the area as necessary and take all appropriate</p>	<p>and inactive facilities, site mitigation, and California Accidental Release Prevention inventory lists at https://fire.lacounty.gov/public-records-requests);</p> <ul style="list-style-type: none"> ○ SCAQMD Facility Information Detail (refer to https://xapprod.aqmd.gov/facility); or • Located on or within 500 feet of a Hazardous Materials site designated as a RCRA Small Quantity Generator or Large Quantity Generator (refer to the USEPA Envirofacts database at https://enviro.epa.gov/index.html); or 		

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<p>measures to protect human health and the environment, including but not limited to, notification of regulatory agencies and identification of the nature and extent of contamination. Stop work in the areas affected until the measures have been implemented consistent with the guidance of the appropriate regulatory oversight authority.</p> <p>i) Soil generated by construction activities should be stockpiled on-site in a secure and safe manner. All contaminated soils determined to be hazardous or non-hazardous waste must be adequately profiled (sampled) prior to acceptable reuse or disposal at an appropriate off-site facility. Complete sampling and handling and transport procedures for reuse or disposal, in accordance with applicable local, state and federal laws and policies.</p> <p>j) Groundwater pumped from the subsurface should be contained on-site in a secure and safe manner, prior to treatment and disposal, to ensure environmental and health issues are resolved pursuant to applicable laws and policies. Utilize engineering controls, which include impermeable barriers to prohibit groundwater and vapor intrusion into the building.</p>	<ul style="list-style-type: none"> • Located on an Oil Drilling District or located on or within 50 feet of a property identified as having an oil well or an oil field (active or inactive) by CalGEM (refer to https://www.conservations.ca.gov/calgem/Pages/WellFinder.aspx); or • Located on any land currently or previously designated with an industrial use class or industrial zoning; or • Located on land currently or previously used for a gas station or dry-cleaning facility. <p>Or:</p> <ul style="list-style-type: none"> • The Applicant or Owner are aware or have reason to be aware that the Project site was previously used for an industrial use, gas station, or dry-cleaner, or otherwise is 		

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<p>k) As needed and appropriate, prior to issuance of any demolition, grading, or building permit, submit for review and approval by the Lead Agency (or other appropriate government agency) written verification that the appropriate federal, state and/or local oversight authorities, including but not limited to the Regional Water Quality Control Board (RWQCB), have granted all required clearances and confirmed that the all applicable standards, regulations, and conditions have been met for previous contamination at the site.</p> <p>L) Develop, train, and implement appropriate worker awareness and protective measures to assure that worker and public exposure is minimized to an acceptable level and to prevent any further environmental contamination as a result of construction.</p> <p>M) If asbestos-containing materials (ACM) are found to be present in building materials to be removed, submit specifications signed by a certified asbestos consultant for the removal, encapsulation, or enclosure of the identified ACM in accordance with all applicable laws and regulations, including but not necessarily limited to: California Code of Regulations, Title 8; Business and Professions Code;</p>	<p>contaminated with hazardous substances.</p> <p>And:</p> <ul style="list-style-type: none"> The site has not been previously remediated to the satisfaction of the relevant regulatory agency/agencies for any contamination associated with the above uses or conditions. <p>(2) A Phase I Environmental Site Assessment (ESA) shall be prepared by a Qualified Environmental Professional in accordance with State standards/guidelines and current professional standards, including the American Society for Testing and Materials (ASTM) Standard Practice for Environmental Site Assessments, to evaluate whether the site, or the surrounding area, is contaminated with hazardous substances from any past or current land uses, including</p>		

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<p>Division 3; California Health and Safety Code Section 25915-25919.7; and other local regulations.</p> <p>n) Where projects include the demolitions or modification of buildings constructed prior to 1978, complete an assessment for the potential presence or lack thereof of ACM, lead based paint, and any other building materials or stored materials classified as hazardous waste by state or federal law.</p> <p>o) Where the remediation of lead-based paint has been determined to be required, provide specifications to the appropriate agency, signed by a certified Lead Supervisor, Project Monitor, or Project Designer for the stabilization and/or removal of the identified lead paint in accordance with all applicable laws and regulations, including but not necessarily limited to: California Occupational Safety and Health Administration's (Cal OSHA's) Construction Lead Standard, Title 8 California Code of Regulations (CCR) Section 1532.1 and Department of Health Services (DHS) Regulation 17 CCR Sections 35001–36100, as may be amended. If other materials classified as hazardous waste by state or federal law are present, the project sponsor should submit written confirmation to the</p>	<p>contamination related to the storage, transport, generation, or disposal of toxic or Hazardous Waste or materials.</p> <p>If the Phase I ESA identifies a Recognized Environmental Condition (REC) and/or if recommended in the Phase I ESA, a Phase II ESA shall also be prepared by a Qualified Environmental Professional. The Phase I and/or Phase II ESAs shall be maintained by the Applicant and Owner and made available for review and inclusion in the case file, as applicable, by the appropriate regulatory agency, such as the SWRCB, DTSC, or LAFD Hazard Mitigation Program. Any remediation plan recommended in the Phase II ESA or by the appropriate regulatory agency shall be implemented and, if required, a No Further Action letter shall be issued by the appropriate regulatory agency prior to issuance of any permit from LADBS, unless the regulating agency determines that</p>		

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<p>appropriate local agency that all state and federal laws and regulations should be followed when profiling, handling, treating, transporting, and/or disposing of such materials.</p>	<p>remedial action can be implemented in conjunction with excavation and/or grading. If oversight or approval by a regulatory agency is not required, the Qualified Environmental Professional shall provide written verification of compliance with and completion of the remediation plan, such that the site meets the applicable standards for the proposed use, which shall be maintained by the Applicant and Owner.</p> <p>4.7-2b Site Remediation and Health and Safety Plan For discretionary projects that require site remediation under MM-HAZ 4.7-2a, if contaminants of concern (COCs) are detected above regulatory action levels, the project applicant shall retain a qualified environmental consultant to prepare a Soil Management Plan (SMP). If the project is under regulatory oversight, the SMP shall be submitted to appropriate agencies (such as SCAQMD,</p>		

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	<p>DTSC or others) for review and approval prior to the commencement of excavation and grading activities. The SMP shall be implemented during excavation and grading activities associated with the project to ensure that contaminated soils are properly identified, excavated, and disposed of off-site, as follows:</p> <ul style="list-style-type: none"> • The SMP shall be prepared and executed in accordance with South Coast Air Quality Management District (SCAQMD) Rule 1166, Volatile Organic Compound Emissions from Decontamination of Soil. The SMP shall require the timely testing and sampling of soils so that contaminated soils can be separated from inert soils for proper disposal. The SMP shall specify the testing parameters and 		

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	<p>sampling frequency. During excavation, Rule 1166 requires that soils identified as contaminated shall be sprayed with water or another approved vapor suppressant or covered with sheeting during periods of inactivity of greater than an hour, to prevent contaminated soils from becoming airborne. Under Rule 1166, contaminated soils shall be transported from the Project Site by a licensed transporter and disposed of at a licensed storage/treatment facility to prevent contaminated soils from becoming airborne or otherwise released into the environment.</p> <ul style="list-style-type: none"> • During the project's excavation phase, the applicant shall remove 		

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	<p>and properly dispose of impacted materials in accordance with the provisions of the SMP. If soil is stockpiled prior to disposal, it will be managed in accordance with the Project's Storm Water Pollution Prevention Plan, prior to its transfer for treatment and/or disposal. All impacted soils would be properly treated and disposed of in accordance with SCAQMD Rule 1166.</p> <ul style="list-style-type: none"> The project applicant shall commission a site-specific Health and Safety Plan (HASP) to be prepared in compliance with Occupational Safety and Health Administration (OSHA) Safety and Health Standards (29 Code of Federal Regulations 1910.120) and Cal-OSHA requirements 		

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	<p>(CCR Title 8, General Industry Safety Orders and California Labor Code, Division 5, Part 1, Sections 6300-6719) and submitted for review by the Department of Building and Safety. The HASP shall address, as appropriate, safety requirements that will serve to avoid significant impacts or risks to workers or the public. The HASP shall include emergency contact numbers, maps to the nearest hospital, gas monitoring action levels, gas response actions, allowable worker exposure times, and mandatory personal protective equipment requirements. The HASP shall be signed by all workers involved in the activities associated with the</p>		

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	<p>investigation to demonstrate their understanding of the risks of excavation.</p> <p>If remediation is determined to be necessary, the grading permit shall not be issued until the applicable regulatory agency has indicated that further remedial action is not required.</p>		
<p>PMM HAZ-5</p> <p>In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects which may impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Continue to coordinate locally and regionally based on ongoing review and integration of projected transportation and circulation conditions.</p>	<p>No applicable mitigation measure.</p>	<p>No applicable mitigation measure.</p>	<p>The City has determined that this SCAG mitigation measure does not apply to the Project, because the mitigation measure is directed toward municipalities with control over transportation/circulation, conveyance of emergency information, and evaluation of emergency routes. Therefore, incorporation of this SCAG mitigation measure into the Project is not required.</p>

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<p>b) Develop new methods of conveying projected and real time information to citizens using emerging electronic communication tools including social media and cellular networks;</p> <p>c) Continue to evaluate lifeline routes for movement of emergency supplies and evacuation.</p>			
Hydrology and Water Quality			
<p>PMM HYD-1</p> <p>In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects from violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Complete, and have approved, a Stormwater Pollution Prevention Plan (SWPPP) prior to initiation of construction.</p>	<p>4.8-1 Drainage Pattern Alterations and Flood Control</p> <p>For any development project that the City has determined based on an expert study will impede or redirect flood flows even with compliance with existing regulations and RCMs, the project shall develop and implement a project-specific Stormwater Pollution Prevention Plan (SWPPP) for compliance with the Clean Water Act's National Pollutant Discharge Elimination System (NPDES) program. The purpose of the SWMP, similar to the SWPPP, is to maintain during construction and operations the existing drainage patterns of the site</p>	<p>No applicable mitigation measure.</p>	<p>As described in the SCEA, the Project would be required to comply with regulations that are equal to or more effective than the mitigation identified by SCAG and the City. Specifically, the Project would be required to comply with existing federal, state, and local regulatory requirements pertaining to water quality standards and waste discharge requirements during construction and operation, as governed by the Los Angeles Regional Water Quality Control Board (LARWQCB) and the City. The Project would comply with Los Angeles Municipal Code (LAMC) Chapter IX, Division 70, which addresses erosion control during grading, excavations, and fills. Project construction activities would require grading, excavation, and</p>

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<p>b) Implement Best Management Practices to reduce the peak stormwater runoff from the project site to the maximum extent practicable.</p> <p>c) Comply with the Caltrans storm water discharge permit as applicable; and identify and implement Best Management Practices to manage site erosion, wash water runoff, and spill control.</p> <p>d) Complete, and have approved, a Standard Urban Stormwater Management Plan, prior to occupancy of residential or commercial structures.</p> <p>e) Ensure adequate capacity of the surrounding stormwater system to support stormwater runoff from new or rehabilitated structures or buildings.</p> <p>f) Prior to construction within an area subject to Section 404 of the Clean Water Act, obtain all required permit approvals and certifications for construction within the vicinity of a watercourse:</p> <p>g) Where feasible, restore or expand riparian areas such that there is no net loss of impervious surface as a result of the project.</p> <p>h) Install structural water quality control features, such as drainage channels, detention basins, oil and grease traps, filter systems, and vegetated buffers to</p>	<p>and vicinity to the maximum extent feasible, to avoid downstream impacts associated with flooding or water quality degradation from ground disturbance during construction. To address the potential for long-term drainage pattern alterations associated with the placement of future development projects in areas where no development is currently present, the SWMP must also include operational and maintenance BMPs; such BMPs may include but would not be limited to the upkeep of landscaped/vegetated swales to dissipate stormwater runoff, or the maintenance (dredging and disposal of accumulated materials) of detention basins placed to capture stormwater runoff resulting from the project.</p>		<p>foundation permits or approvals from the City, which would include requirements and standards designed to limit erosion. The Project would also be designed to comply with the City's Low Impact Development (LID) Ordinance. Prior to the issuance of grading permits, the Applicant would submit a LID Plan to the City's Bureau of Sanitation (LASAN) Watershed Protection Division for review and approval. The LID Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook. The Project would be required to comply with the NPDES General Construction Permit, including the preparation of a SWPPP and implementation of BMPs that would require the Project to minimize soil erosion/sedimentation and other runoff from the site from entering the storm drains during the construction period. The Project would be subject to the City's Stormwater and Urban Runoff Pollution Control regulations (Ordinance No. 172,176 and No. 173,494) to ensure pollutant loads from the Project Site would be</p>

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<p>prevent pollution of adjacent water resources by polluted runoff where required by applicable urban storm water runoff discharge permits, on new facilities.</p> <p>i) Provide operational best management practices for street cleaning, litter control, and catch basin cleaning are implemented to prevent water quality degradation in compliance with applicable storm water runoff discharge permits; and ensure treatment controls are in place as early as possible, such as during the acquisition process for rights-of-way, not just later during the facilities design and construction phase.</p> <p>j) Comply with applicable municipal separate storm sewer system discharge permits as well as Caltrans' storm water discharge permit including long-term sediment control and drainage of roadway runoff.</p> <p>k) Incorporate as appropriate treatment and control features such as detention basins, infiltration strips, and porous paving, other features to control surface runoff and facilitate groundwater recharge into the design of new transportation projects early on in the process to ensure that adequate acreage and elevation contours are</p>			<p>minimized for downstream receiving waters. Compliance with the City's discharge requirements would ensure that construction stormwater runoff would not violate water quality and/or discharge requirements and minimize soil erosion and sedimentation from entering the storm drains during the construction period. During operation the Project would be required to comply with the City's LID Ordinance. The LID Ordinance applies to all development and redevelopment in the City that requires replace or creates more than 500 square feet of impervious area. LID Plans are required to include a site design approach and BMPs that address runoff and pollution at the source. Further, to comply with LID Ordinance the Project would be required to capture and treat the runoff volume produced by the 85th percentile storm event in accordance with established stormwater treatment priorities. Compliance with the LID Ordinance would reduce the amount of surface water runoff leaving the Project Site as compared to the current conditions. Compliance with the LID</p>

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<p>provided during the right-of-way acquisition process.</p> <p>l) Upgrade stormwater drainage facilities to accommodate any increased runoff volumes. These upgrades may include the construction of detention basins or structures that will delay peak flows and reduce flow velocities, including expansion and restoration of wetlands and riparian buffer areas. System designs shall be completed to eliminate increases in peak flow rates from current levels.</p> <p>m) Encourage Low Impact Development (LID) and incorporation of natural spaces that reduce, treat, infiltrate and manage stormwater runoff flows in all new developments, where practical and feasible.</p>			<p>Plan and Stormwater and Urban Runoff Pollution Control Ordinance, including the implementation of BMPs, would ensure that operation of the Project would not violate water quality standard and discharge requirements or otherwise substantially degrade water quality. Consistent with the City's Stormwater and Urban Runoff Pollution Control regulations (Ordinance No. 181,899 and No. 183,833), the Project would be required to adhere to City discharge requirements and would implement BMPs meant to reduce stormwater pollution during demolition, grading, and construction activities.</p> <p>Thus, due to the Project's required compliance with these regulations, no hydrology or water quality impacts would occur, and incorporation of SCAG and City mitigation measures is not required.</p>
<p>PMM HYD-2</p> <p>In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation</p>	<p>See 4.8-1 above.</p>	<p>No applicable mitigation measure.</p>	<p>As described in the SCEA, the Project Site is located in an urbanized area of the City and is vacant. During a storm event, stormwater runoff flows to the adjacent roadways where it is directed into the City's storm drain</p>

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<p>measures to reduce substantial adverse effects from violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Avoid designs that require continual dewatering where feasible.</p> <p>For projects requiring continual dewatering facilities, implement monitoring systems and long-term administrative procedures to ensure proper water management that prevents degrading of surface water and minimizes adverse impacts on groundwater for the life of the project, Construction designs shall comply with appropriate building codes and standard practices including the Uniform Building Code.</p> <p>a) Maximize, where practical and feasible, permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. Minimize new impervious surfaces, including the use of in-lieu fees and off-site mitigation.</p>			<p>system. As such, the Project Site is not a significant source of groundwater recharge. Following redevelopment of the Project Site with a new mixed-use building, groundwater recharge would remain negligible, similar to existing conditions.</p> <p>The basement grade of the proposed building would be established close to the historically high groundwater level. In compliance with all applicable City building and excavation requirements, and as specified in a required final design-level geotechnical report to be reviewed and approved by LADBS, the basement slabs would be properly waterproofed.</p> <p>If groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance with all applicable regulations and requirements, including with all relevant NPDES requirements related to construction and discharges from dewatering operations. Therefore, the Project</p>

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<p>b) Avoid construction and siting on groundwater recharge areas, to prevent conversion of those areas to impervious surface.</p> <p>c) Reduce hardscape to the extent feasible to facilitate groundwater recharge as appropriate.</p>			<p>would not substantially deplete groundwater supplies in a manner that would result in a net deficit in aquifer volume or lowering of the local groundwater table and impacts related to groundwater hydrology would be less than significant.</p> <p>While no dewatering is anticipated to be required either during construction or operation, should dewatering be subsequently deemed necessary, all such dewatering would be performed in pursuant to applicable Los Angeles Regional Water Quality Control Board requirements (see Mitigation Measure MM-HAZ-2, above).</p> <p>Compliance with these existing regulations, which are equal to or more effective than the relevant mitigation measures identified by SCAG and the City, would ensure that no significant impacts regarding surface or groundwater quality would occur; therefore, incorporation of these SCAG and City mitigation measures into the Project is not required.</p>

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<p>PMM HYD-4</p> <p>In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures capable of avoiding or reducing the potential impacts of locating structures that would impede or redirect flood flows, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Ensure that all roadbeds for new highway and rail facilities be elevated at least one foot above the 100-year base flood elevation. Since alluvial fan flooding is not often identified on FEMA flood maps, the risk of alluvial fan flooding should be evaluated and projects should be sited to avoid alluvial fan flooding. Delineation of floodplains and alluvial fan boundaries should attempt to account for future hydrologic changes caused by global climate change.</p>	<p>No applicable mitigation measure.</p>	<p>No applicable mitigation measure.</p>	<p>As described in the SCEA, the Project Site is not in an area susceptible to floods, tsunamis, or seiches. Therefore, the Project would not risk release of pollutants due to inundation by floods, tsunamis, or seiches, and no mitigation is required. Accordingly, incorporation of this SCAG mitigation measure is not required.</p>
<p>Land Use and Planning</p>			
<p>PMM LU-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA</i></p>	<p>No applicable mitigation measure.</p>		<p>The Project does not include the development of a transportation project and would not otherwise</p>

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<p><i>Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects that physically divide a community, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Facilitate good design for land use projects that build upon and improve existing circulation patterns</p> <p>b) Encourage implementing agencies to orient transportation projects to minimize impacts on existing communities by:</p> <ul style="list-style-type: none"> • Selecting alignments within or adjacent to existing public rights of way. • Design sections above or below-grade to maintain viable vehicular, cycling, and pedestrian connections between portions of communities where existing connections are disrupted by the transportation project. • Wherever feasible incorporate direct crossings, overcrossings, or under crossings at regular intervals for multiple modes of travel (e.g., pedestrians, bicyclists, vehicles). 			<p>physically divide a community; accordingly, no relevant mitigation applies. Thus, incorporation of this SCAG mitigation measure is not required.</p>

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<p>c) Where it has been determined that it is infeasible to avoid creating a barrier in an established community, consider other measures to reduce impacts, including but not limited to:</p> <ul style="list-style-type: none"> • Alignment shifts to minimize the area affected. • Reduction of the proposed right-of-way take to minimize the overall area of impact. • Provisions for bicycle, pedestrian, and vehicle access across improved roadways. 			
<p>PMM LU-2</p> <p>In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects that physically divide a community, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) When an inconsistency with the adopted general plan policy or land use regulation (adopted for the purpose of avoiding or mitigating an impact) is identified modify the transportation or</p>	<p>No applicable mitigation measure.</p>		<p>As described in the SCEA, the Project is consistent with the Project Site's General Plan and C2-1 zoning in conjunction with the TOC Program and permitted Tier 3 development rights provided in exchange for the provision of 10% of the total units (29 units) for Extremely Low Income households. Accordingly, the Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an</p>

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land use project to eliminate the conflict; or, determine if the environmental, social, economic, and engineering benefits of the project warrant an amendment to the general plan or land use regulation.			environmental effect, and no mitigation measures are required. Therefore, incorporation of this SCAG mitigation measure is not required.
No applicable mitigation measure.	No applicable mitigation measure.	<p>LU 1</p> <p>Prior to the decision to remove on-street parking, the City of Los Angeles shall meet with the affected business and property owners to discuss the potential for the removal of on-street parking to affect the economic viability of the affected businesses. The City shall identify parking replacement options to businesses that do not have off-street parking and would be substantially affected by the permanent removal of on-street parking.</p>	The Project would provide sufficient off-street parking as allowed for projects within a TOC Tier 3 area. The Project would also retain existing on-street parking to the extent feasible. In addition, nearby businesses currently provide off-street parking for their employees and patrons. Thus, no parking-related impacts would result from the Project, and incorporation of this City mitigation measure is not required.
Mineral Resources			
<p>PMM MIN-1</p> <p>In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA</i></p>	No applicable mitigation measure.	No applicable mitigation measure.	As described in the SCEA, the Project Site is located in an urbanized part of the City. There are no known mineral resources on the Project Site or in the vicinity. Thus,

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<p><i>Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce the use of mineral resources that could be of value to the region, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Provide for the efficient use of known aggregate and mineral resources or locally important mineral resource recovery sites, by ensuring that the consumptive use of aggregate resources is minimized and that access to recoverable sources of aggregate is not precluded, as a result of construction, operation and maintenance of projects.</p> <p>b) Where avoidance is infeasible, minimize impacts to the efficient and effective use of recoverable sources of aggregate through measures that have been identified in county and city general plans, or other comparable measures such as:</p> <ol style="list-style-type: none"> 1) Recycle and reuse building materials resulting from demolition, particularly aggregate resources, to the maximum extent practicable. 2) Identify and use building materials, particularly aggregate materials, resulting from 			<p>the Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state, and no impacts would occur. Thus, incorporation of this SCAG mitigation measure is not required.</p>

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<p>demolition at other construction sites in the SCAG region, or within a reasonable hauling distance of the project site.</p> <p>3) Design transportation network improvements in a manner (such as buffer zones or the use of screening) that does not preclude adjacent or nearby extraction of known mineral and aggregate resources following completion of the improvement and during long-term operations.</p> <p>4) Avoid or reduce impacts on known aggregate and mineral resources and mineral resource recovery sites through the evaluation and selection of project sites and design features (e.g., buffers) that minimize impacts on land suitable for aggregate and mineral resource extraction by maintaining portions of MRZ-2 areas in open space or other general plan land use categories and zoning that allow for mining of mineral resources.</p>			
Noise			

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<p>PMM NOISE-1</p> <p>In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects that physically divide a community, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Install temporary noise barriers during construction.</p> <p>b) Include permanent noise barriers and sound-attenuating features as part of the project design. Barriers could be in the form of outdoor barriers, sound walls, buildings, or earth berms to attenuate noise at adjacent sensitive uses.</p> <p>c) Schedule construction activities consistent with the allowable hours pursuant to applicable general plan noise element or noise ordinance</p> <p>d) Post procedures and phone numbers at the construction site for notifying the Lead Agency staff, local Police Department, and construction contractor (during regular construction hours and off-hours), along with permitted construction days and hours, complaint</p>	<p>4.10-1(a) Noise Shielding and Silencing</p> <p>For all discretionary projects, power construction equipment (including combustion engines), fixed or mobile, shall be equipped with noise shielding and silencing devices consistent with manufacturer's standards or the Best Available Control Technology. Equipment shall be properly maintained, and the Project Applicant or Owner shall require any construction contractor to keep documentation on-site during any earthwork or construction activities demonstrating that the equipment has been maintained in accordance with manufacturer's specifications. Measure shall be shown on plans.</p> <p>4.10-1(b) Use of Driven Pile Systems</p> <p>For all discretionary projects, driven (impact), sonic, or vibratory pile drivers shall not be used, except in locations where the underlying geology renders alternative methods</p>	<p>N1</p> <p>Construction activity that would last more than a day, that could increase ambient noise by more than 5 dBA, and would be located within 500 feet of a sensitive land use shall incorporate measures to reduce noise levels at sensitive receptors including, but not limited to, sound walls, sound blankets on impact equipment, and engine mufflers to reduce noise levels to acceptable levels. The noise reduction levels achieved by the measures shall limit noise increases to less than 5 dBA over the existing ambient levels.</p>	<p>As described in the SCEA, Noise Technical Modeling was performed and analyzed for the Project and included in Appendix H of the SCEA. The analysis concluded that while the Project's operational activities would not exceed applicable thresholds, the Project's construction activities could potentially result in noise levels in excess of the City's significance thresholds. Accordingly, Project- and impact-specific mitigation measures (Mitigation Measures MM-NOI-1 through MM-NOI-7) will be implemented to ensure the Project's construction noise impact would be less than significant.</p> <p>MM-NOI-1 Sound barriers rated to achieve a sound attenuation of at least 15 dBA shall be erected along the Project's eastern boundary that is adjacent to residential uses along South Alfred Street (i.e., "South Alfred Street Residences"). These sound barriers shall be a minimum 15 feet in height. Sound barriers abutting the Project's boundary with the residence located at 1023 S. Alfred Street shall be a minimum 20 feet in height and shall also be rated</p>

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<p>procedures, and who to notify in the event of a problem.</p> <p>e) Notify neighbors and occupants within 300 feet of the project construction area at least 30 days in advance of anticipated times when noise levels are expected to exceed limits established in the noise element of the general plan or noise ordinance.</p> <p>f) Designate an on-site construction complaint and enforcement manager for the project.</p> <p>g) Ensure that construction equipment are properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded.</p> <p>h) Use hydraulically or electrically powered tools (e.g., jack hammers, pavement breakers, and rock drills) for project construction to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust should be</p>	<p>infeasible, as determined by a soils or geotechnical engineer and documented in a soils report. Requirement shall show on plans.</p> <p>4.10-1(c) Enclosures and Screening For all discretionary projects, all outdoor mechanical equipment shall be enclosed or screened from off-site noise-sensitive uses. The equipment enclosure or screen shall be impermeable (i.e., solid material with minimum weight of 2 pounds per square feet) and break the line-of-sight from the equipment and off-site noise-sensitive uses.</p> <p>4.10-1(d) Construction Staging Areas Construction staging areas shall be located as far from noise-sensitive uses as reasonably possible and feasible in consideration of site boundaries, topography, intervening roads and uses, and operational constraints. Requirement shall show on plans.</p>		<p>to achieve a sound attenuation of at least 15 dBA.</p> <p>MM-NOI-2 When bulk excavation activities are taking place, only one excavator or other heavy earthmoving vehicle shall be permitted to operate at any given time within 50 feet of individual residential properties associated with the South Alfred Street Residences receptor.</p> <p>MM-NOI-3 Sound barriers rated to achieve a sound attenuation of at least 15 dBA shall be erected along the Project's western boundary that is adjacent to La Cienega Boulevard. These sound barriers shall be a minimum 7 feet in height.</p> <p>MM-NOI-4 When in use, concrete mixing trucks and concrete pumps operating from the La Cienega Boulevard public right-of-way, outside the confines of the sound barriers required by Mitigation Measure MM-NOI-3, shall be shielded with sound barriers rated to achieve a sound attenuation of at least 10 dBA.</p>

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<p>used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves should be used, if such jackets are commercially available, and this could achieve a further reduction of 5 dBA. Quieter procedures should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures.</p> <p>i) Where feasible, design projects so that they are depressed below the grade of the existing noise-sensitive receptor, creating an effective barrier between the roadway and sensitive receptors.</p> <p>j) Where feasible, improve the acoustical insulation of dwelling units where setbacks and sound barriers do not provide sufficient noise reduction.</p> <p>k) Using rubberized asphalt or “quiet pavement” to reduce road noise for new roadway segments, roadways in which widening or other modifications require re-pavement, or normal reconstruction of roadways where re-pavement is planned</p> <p>l) Projects that require pile driving or other construction noise above 90 dBA in proximity to sensitive receptors, should reduce potential pier drilling, pile driving and/or other extreme noise generating construction impacts greater</p>	<p>4.10-1(e) Temporary Sound Barriers Sound barriers, such as temporary walls or sound blankets, shall be erected between construction activities and noise-sensitive uses when construction activities are located within a line-of-sight to and within 500 feet of noise-sensitive uses. Requirement shall show on plans.</p> <p>4.10-1(f) Project-Specific Construction Noise Study A Construction Noise Study, prepared by a qualified noise expert to meet the requirements herein, shall be required for discretionary projects in the City located within 500 feet of noise-sensitive land uses and that have one or more of the following characteristics:</p> <ul style="list-style-type: none"> • Two or more subterranean levels or 20,000 cubic yards or more of excavated material; 		<p>MM-NOI-5 If auger-cast piles are installed under the footprint of the proposed tower, they shall be installed in a pattern of vertical north-south rows, parallel to La Cienega Boulevard. Daily pile installation along these rows shall be spread over a maximum north-south distance, which would dilute noise impacts to any individual S. Alfred Street residence.</p> <p>MM-NOI-6 If DSM columns are installed under the footprint of the proposed tower, they shall be installed in a pattern of vertical north-south rows, parallel to La Cienega Boulevard. Daily column installation shall be spread over a maximum north-south distance, which would dilute noise impacts to any individual S. Alfred Street residence.</p> <p>MM-NOI-7 The on-site location of any slurry batch plant utilized for the installation of DSM columns shall be either (1) centered within the Project Site, no less than 80 feet from the Project’s eastern or western boundaries or (2) the slurry batch plant shall be shielded by sound</p>

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<p>than 90 dBA; a set of site-specific noise attenuation measures should be completed under the supervision of a qualified acoustical consultant.</p> <p>m) Use land use planning measures, such as zoning, restrictions on development, site design, and buffers to ensure that future development is compatible with adjacent transportation facilities and land uses;</p> <p>n) Monitor the effectiveness of noise reduction measures by taking noise measurements and installing adaptive mitigation measures to achieve the standards for ambient noise levels established by the noise element of the general plan or noise ordinance.</p> <p>o) Use equipment and trucks with the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds, wherever feasible) for project construction.</p> <p>p) Stationary noise sources can and should be located as far from adjacent sensitive receptors as possible and they should be muffled and enclosed within temporary sheds, incorporate insulation barriers, or use other measures as determined by the Lead Agency (or other</p>	<ul style="list-style-type: none"> • Construction duration (excluding architectural coatings) of 18 months or more; • Use of large, heavy-duty equipment rated 300 horsepower or greater; or • The potential for impact pile driving. <p>The Construction Noise Study shall characterize sources of construction noise, quantify noise levels at noise-sensitive uses (e.g., residences, transient lodgings, schools, libraries, churches [or other places of assembly], hospitals, nursing homes, auditoriums, concert halls, amphitheaters, playgrounds, and parks), and identify measures to reduce noise exposure. The Construction Noise Study shall identify reasonably available noise reduction devices or techniques to reduce noise levels to acceptable levels and/or durations including through reliance on any relevant federal, state or local</p>		<p>barriers rated to achieve a sound attenuation of at least 15 dBA.</p> <p>The above measures were designed in consideration of the Project's specific construction- and location-related characteristics and therefore reflect a more tailored mitigation approach than the measures identified by SCAG and the City. Therefore, the Project-specific measures are equal to or more effective than the mitigation identified by SCAG and the City, and incorporation of the SCAG and City mitigation measures is therefore not required.</p>

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<p>appropriate government agency) to provide equivalent noise reduction.</p> <p>q) Use of portable barriers in the vicinity of sensitive receptors during construction.</p> <p>r) Implement noise control at the receivers by temporarily improving the noise reduction capability of adjacent buildings (for instance by the use of sound blankets), and implement if such measures are feasible and would noticeably reduce noise impacts.</p> <p>s) Monitor the effectiveness of noise attenuation measures by taking noise measurements.</p> <p>t) Maximize the distance between noise-sensitive land uses and new roadway lanes, roadways, rail lines, transit centers, park-and-ride lots, and other new noise-generating facilities.</p> <p>u) Construct sound reducing barriers between noise sources and noise-sensitive land uses.</p> <p>v) Stationary noise sources can and should be located as far from adjacent sensitive receptors as possible and they should be muffled and enclosed within temporary sheds, incorporate insulation barriers, or use other measures as determined by the Lead Agency (or other appropriate government agency) to provide equivalent noise reduction.</p>	<p>standards or guidelines or accepted industry practices, and in compliance with LAMC standards. Noise reduction devices or techniques may include but not be limited to mufflers, shields, sound barriers, and time and place restrictions on equipment and activities. Each measure in the Construction Noise Study shall identify anticipated noise reductions at noise-sensitive land uses.</p> <p>Project Applicants shall be required to comply with all requirements of Mitigation Measures 4.10-1(a) through 4.10-5(e) in addition to any additional requirements identified and recommended by the Construction Noise Study and shall maintain proof that notice of, as well as compliance with, the identified measures have been included in contractor agreements.</p> <p>4.10-2 Project-Specific Operational Noise Study A Noise Study, prepared by a qualified noise expert to meet</p>		

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<p>w) Use techniques such as grade separation, buffer zones, landscaped berms, dense plantings, sound walls, reduced-noise paving materials, and traffic calming measures.</p> <p>x) Locate transit-related passenger stations, central maintenance facilities, decentralized maintenance facilities, and electric substations away from sensitive receptors to the maximum extent feasible.</p> <p>y) Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities.</p>	<p>the requirements herein, shall be required for all discretionary housing developments with roof decks and/or pool decks in the City of Los Angeles concurrent with Design Review and prior to the approval of building permits. The Noise Study shall include:</p> <ul style="list-style-type: none"> • Description of pertinent noise regulations. • Analysis of operational noise generated by the project's roof decks and/or pool decks to noise-sensitive land uses. • Comparison of noise levels to applicable City thresholds, such as if the project's operational noise would exceed 3 dBA in an unacceptable land use category or 5 dBA in an acceptable land use category per the City's land use compatibility guidelines included in the City of Los Angeles 		

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	<p>General Plan Noise Element.</p> <ul style="list-style-type: none"> • If project noise would exceed City thresholds, identification of mitigation measures to reduce noise to below 3dBA in an unacceptable land use category or 5 dBA in an acceptable land use category to the extent feasible. Mitigation measures may include, but would not be limited to, operational restrictions, sound dampening equipment, or sound walls. • Each mitigation measure in the Noise Study shall identify anticipated noise reductions at noise-sensitive land uses. • Applicant/owners shall comply with the mitigation plan and include the measures 		

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	<p>in construction contracts.</p> <p>Mitigation plan shall be included on plans.</p>		
<p>PMM NOISE-2</p> <p>In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to violating air quality standards, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the potential vibration impacts to the structural integrity of the adjacent buildings within 50 feet of pile driving locations.</p> <p>b) For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the threshold levels of vibration and cracking that could damage adjacent historic or other structure, and design means and</p>	<p>4.10-3(a) Vibration Control Plan</p> <p>For construction activity for discretionary projects involving vibratory rollers or sonic pile drivers within 50 feet of an extremely fragile building (non-engineered masonry) or historical resource (designated or in SurveyLA or other City recognized survey), the Applicant shall prepare a Vibration Control Plan. The Vibration Control Plan requirement shall also apply to use of impact pile drivers within 140 feet of extremely fragile buildings or historical resources or residential structures. The Vibration Control Plan shall be prepared by a licensed structural engineer and shall include methods to minimize vibration, including, but not limited to:</p> <ul style="list-style-type: none"> • Use of drilled piles or similar method rather than impact pile driving 	<p>N2</p> <p>A project-specific vibration analysis shall be completed if the City determines that construction equipment would be located within 11 feet of non-engineered timber and masonry buildings (typical of residential buildings and institutional buildings). Potential vibration impacts shall be mitigated such that vibration levels do not exceed 0.3 inches per second at 11 feet. Methods to reduce vibration include, but are not limited to, choosing to use light weight equipment when an option between equipment types is available and avoiding impact equipment (e.g., jackhammers).</p>	<p>As described in the SCEA, Noise Technical Modeling was performed and analyzed for the Project and included in Appendix H of the SCEA. The analysis concluded that the Project's construction activities could result in groundborne vibration levels in excess of the applicable significance threshold; accordingly, Project- and impact-specific mitigation measures (Mitigation Measures MM-NOI-8 through MM-NOI-10 (listed below) have been identified and will be implemented to ensure the Project's construction-related groundborne vibration impact would be less than significant.</p> <p>MM-NOI-8 Large earthmoving vehicles that are the vibrational equivalent of the FTA's "Large Bulldozer" vibration reference equipment shall maintain a setback of at least 20 feet from South Alfred Street Residences and 6 feet from the commercial building at 1080 La Cienega Boulevard.</p>

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<p>construction methods to not exceed the thresholds.</p> <p>c) For projects where pile driving would be necessary for construction due to geological conditions, utilize quiet pile driving techniques such as predrilling the piles to the maximum feasible depth, where feasible. Predrilling pile holes will reduce the number of blows required to completely seat the pile and will concentrate the pile driving activity closer to the ground where pile driving noise can be shielded more effectively by a noise barrier/curtain.</p> <p>d) Restrict construction activities to permitted hours in accordance with local jurisdiction regulation.</p> <p>e) Properly maintain construction equipment and outfit construction equipment with the best available noise suppression devices (e.g., mufflers, silences, wraps).</p> <p>f) Prohibit idling of construction equipment for extended periods of time in the vicinity of sensitive receptors.</p>	<ul style="list-style-type: none"> • Use of rubber-tired equipment rather than metal-tracked equipment • Avoiding the use of vibrating equipment when allowed by best engineering practices <p>The Vibration Control Plan shall include a pre-construction survey letter establishing baseline conditions at potentially affected extremely fragile buildings/historical resources. The survey letter shall provide a shoring design to protect the extremely fragile buildings/historical resources from potential damage. At the conclusion of vibration causing activities, the qualified structural engineer shall issue a follow-up letter describing damage, if any, to impacted buildings. The letter shall include recommendations for any repair, as may be necessary, in conformance with the Secretary of the Interior Standards. Repairs shall be undertaken and</p>		<p>MM-NOI-9 Vibratory rollers shall maintain a setback of at least 45 feet from South Alfred Street Residences and 15 feet from the commercial building at 1080 La Cienega Boulevard.</p> <p>MM-NOI-10 Pre-construction surveys shall be performed to document the existing conditions of contributing structures that are a part of the South Carthay HPOZ (“Contributing Structures”) and immediately adjacent to the Project Site. A groundborne vibration and structural/architectural monitoring program shall be implemented and recorded during the Project’s excavation and any other phases that require the use of large earthmoving vehicles and/or vibratory rollers to ensure that groundborne vibration levels at the boundary of the Project Site adjacent to these Contributing Structures do not exceed 0.12 inches per second. The performance standards of the groundborne vibration and structural/architectural program shall include the following:</p>

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	<p>completed by the Contractor and monitored by a qualified structural engineer in conformance with all applicable codes including the California Historical Building Code (Part 8 of Title 24).</p> <p>A Statement of Compliance, in a form approved by the City, committing the Applicant and Owner to complying with the measure shall be signed by the Applicant and Owner is required to be submitted to the Los Angeles Department of Building and Safety (LADBS) at plan check and prior to the issuance of any permit. The Vibration Control Plan, prepared as outlined above shall be documented by a qualified structural engineer, and shall be provided to the City upon request. Vibration Control Plan shall show on the plans.</p> <p>4.10-3(b) Vibration Mitigation For all discretionary projects:</p> <ul style="list-style-type: none"> Impact pile drivers shall be avoided to eliminate excessive 		<ul style="list-style-type: none"> Prior to the start of construction, a detailed photographic survey shall document existing visible exterior conditions of Contributing Structures that are immediately adjacent to the Project Site. Any existing exterior damage that is visible from the Project Site shall be noted. A vibration monitoring system shall be installed at a location that is immediately adjacent to the Project's boundary with Contributing Structures. This system shall continuously measure and store vibration velocities during periods of construction activity. The system shall provide real-time alerts to a construction supervisor or representative immediately if a vibration velocity of 0.12 inches per second is detected. In the event that a vibration velocity of 0.12 inches per second is detected, work shall stop immediately in the vicinity of the affected area and nearby Contributing Structures. Construction activities may not resume until the source of the vibration exceedance has been identified and measures have been taken to prevent vibration related

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	<p>vibration levels. Drilled piles or similar methods are alternatives that shall be utilized where geological conditions permit their use.</p> <ul style="list-style-type: none"> • Construction activities shall involve rubber-tired equipment rather than metal-tracked equipment. <p>The construction contractor shall manage construction phasing (scheduling demolition, earthmoving, and ground-impacting operations so as not to occur in the same time period), use low-impact construction technologies, and shall avoid the use of vibrating equipment when allowed by best engineering practices.</p> <p>Requirement to be on plans.</p>		<p>damage from occurring. If necessary, feasible steps to reduce groundborne vibration levels shall be taken, such as downsizing construction equipment, reducing equipment power levels, or using less impactful techniques.</p> <p>The above measures require the assessment of existing conditions prior to construction activities, as well as the monitoring and control of vibration levels associated with Project construction, consistent with the scope and purpose of the mitigation measures identified by SCAG and the City. Moreover, as demonstrated by the SCEA, with implementation of the above mitigation measures, the Project will not result in any vibration-related impacts. Accordingly, the above mitigation measures are equal to or more effective than the SCAG and City measures, which do not need to be incorporated into the Project.</p>
Population and Housing			
<p>PMM-POP-1</p> <p>In accordance with provisions of sections 15091(a)(2) and</p>	<p>No applicable mitigation measure.</p>	<p>No applicable mitigation measure.</p>	<p>As described in the SCEA, no housing is currently located on the Project Site, and no housing would be displaced as a result of the</p>

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<p>15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce the displacement of existing housing, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Evaluate alternate route alignments and transportation facilities that minimize the displacement of homes and businesses. Use an iterative design and impact analysis where impacts to homes or businesses are involved to minimize the potential of impacts on housing and displacement of people. b) Prioritize the use existing ROWs, wherever feasible. c) Develop a construction schedule that minimizes potential neighborhood deterioration from protracted waiting periods between right-of-way acquisition and construction. d) Review capacities of available urban infrastructure and augment capacities as needed to accommodate demand in locations where growth is desirable to the local lead Agency and encouraged by the SCS (primarily TPAs, where applicable). e) When General Plans and other local land use regulations are amended or 			<p>Project. Accordingly, no population and housing impacts would result from the Project, and no relevant mitigation from SCAG need be incorporated into the Project.</p>

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updated, use the most recent growth projections and RHNA allocation plan.			
Public Services			
<p>PMM PSP-1</p> <p>In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of constructing new emergency response facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • Coordinate with emergency response agencies to ensure that there are adequate governmental facilities to maintain acceptable service ratios, response times or other performance objectives for emergency response services and that any required additional construction of buildings is incorporated in to the project description. • Where current levels of services at the project site are found to be inadequate, provide fair share 	<p>4.12-1(a) Design Plans Review</p> <p>For discretionary projects with more than 300 housing units or located in VHFHSZ or SRA areas and where LAFD finds it necessary on the basis that existing regulations are not adequate to avoid risk of fire based on unusual site-specific, area, roadway or project characteristics, prior to the start of construction, design plans shall be submitted to the LAFD that demonstrate the use of construction and design features that reduce fire potential and/or promote containment, including increased spacing between buildings, noncombustible roofs, fire-resistant landscaping, and special irrigation facilities. Design features shall be reviewed and approved by the LAFD prior to project approval.</p>	<p>No applicable mitigation measure.</p>	<p>As described in the SCEA, the Project would be subject to compliance with fire protection design standards, as necessary, per the California Building Code, California Fire Code, LAMC, and the Los Angeles Fire Department (LAFD), to ensure adequate fire protection. The City requires that plans for building construction, fire flow requirements, fire protection devices (e.g. sprinklers and alarms), fire hydrants and spacing, and fire access (including ingress/egress), turning radii, driveway width, and grading would be prepared for review and approval by the LAFD. Furthermore, the Project Site is not located in a hillside or surrounded by vegetation requiring a Fire/Vegetation Management Plan. Furthermore, the Project does not contain more than 300 units, nor is it located in a VHFHSZ or SRA area. Accordingly, the Project would not result in a substantial increase in demand for additional fire protection services that would exceed the</p>

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<p>contributions towards infrastructure improvements, as appropriate and applicable, to mitigate identified CEQA impacts.</p> <ul style="list-style-type: none"> Project sponsors can and should develop traffic control plans for individual projects. Traffic control plans should include information on lane closures and the anticipated flow of traffic during the construction period. The basic objective of each traffic control plan (TCP) is to permit the contractor to work within the public right of way efficiently and effectively while maintaining a safe, uniform flow of traffic. The construction work and the public traveling through the work zone in vehicles, bicycles or as pedestrians must be given equal consideration when developing a traffic control plan. 	<p>Upon completion of project construction, a diagram of each portion of the property, including access routes and any additional information that might facilitate fire and emergency medical response, shall be submitted to the LAFD.</p> <p>4.12-1(b) Emergency Access</p> <p>For discretionary projects with more than 300 units or located in VHFHSZ or SRA areas and where LAFD finds it necessary on the basis that existing regulations are not adequate to avoid risk of fire based on unusual site-specific, area, roadway or project characteristics, during demolition and construction of discretionary projects, access roads and alleyways shall remain clear and unobstructed in order to ensure access for emergency vehicles. If road closures during construction are necessary, prior to the issuance of a building permit for the discretionary project, a detailed Construction Management Plan including street closure information, a</p>		<p>capability of the LAFD, such that it would require the construction of a new fire station, and no mitigation is required.</p> <p>In accordance with existing City regulations, the Project would implement appropriate temporary security features during construction (such as installing chain link fencing and security lighting around the Project Site). Further, during operation, the Project would provide perimeter lighting to provide increased visibility and security, parking access control, and residential units access control. These measures would provide defensible spaces designed to reduce opportunity crime and ensure safety and security. Therefore, the Project is not anticipated to generate a demand for additional police protection services that could exceed the Los Angeles Police Department's (LAPD) capability to serve the Project Site. As such, the Project would not require the addition of a new police facility or the expansion, consolidation, or relocation of an existing police station to maintain</p>

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	<p>detour plan, haul routes, and a staging plan, shall be prepared and submitted to the Los Angeles Fire Department and the Los Angeles Department of Transportation for review and approval.</p> <p>Furthermore, if emergency access gates are provided on a project access road, the gates shall be equipped with approved locking devices for both Los Angeles City and County Fire Departments on both sides of the gate. Signs shall be provided on the project access road.</p> <p>4.12-1(c) Hillside Fire/Vegetation Management Plan</p> <p>For discretionary projects with more than 300 units or located in VHFHSZ or SRA areas and where LAFD finds it necessary on the basis that existing regulations are not adequate to avoid risk of fire based on unusual site-specific, area, roadway or project characteristics, projects shall have a 200-foot minimum Fuel</p>		<p>service ratios, and no mitigation is required.</p> <p>Thus, the SCEA is consistent with SCAG's and the City's applicable mitigation measures regarding Public Services, and incorporation of SCAG's and the City's mitigation measures is not required.</p>

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	<p>Management Zone in place, and it shall be cleared annually, around each structure on the project site. A Fire/Vegetation Management Plan for the Fuel Management Zone shall be prepared that requires the following: all-natural vegetation will be thinned out by 70 percent and all dead vegetation, including grass will be maintained at less than four inches in height; if the zone is not irrigated, the area may be covered with chipped biomass four inches deep; no tree limb shall be within 10 feet of a chimney, including outdoor barbeques; trees must be maintained free of dead branches; trees must be limbed up four feet or 1/3 the height of the tree; trees over driveways or roads must be limbed up to 15 feet; the shrub height limit is two feet.</p> <p>Furthermore, the following requirements shall be included in the Fire/Vegetation Management Plan. The following shrubs and trees are</p>		

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	<p>highly flammable and shall not be planted on or around the project site:</p> <ul style="list-style-type: none"> • Sage species (<i>Salvia</i> spp.) • Pampas grass (<i>Cortaderia</i> spp.) • Cypress (<i>Cupressus</i> spp.) • Eucalyptus (<i>Eucalyptus</i> spp.) • Juniper (<i>Juniperus</i> spp.) • Pine (<i>Pinus</i> spp.) • Cedar (<i>Cedrus</i> spp.) <p>The following shrubs and trees shall be used for general landscaping to reduce fire hazard associated with flammable vegetation:</p> <ul style="list-style-type: none"> • Coastal live oak (<i>Quercus</i> spp.) • California sycamore (<i>Platanus racemosa</i>) • Cottonwood (<i>Populus fremontii</i>) • Willow (<i>Salix</i> spp.) 		

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	<ul style="list-style-type: none"> • Mulefat (<i>Baccharis salicifolia</i>) • California bay (<i>Umbellularia californica</i>) • California black walnut (<i>Juglans californica</i>) • Liquidambar (<i>Liquidambar styraciflua</i>) • California lilac (<i>Ceanothus</i> spp.) • Toyon (<i>Heteromeles arbutifolia</i>) • Mountain mahogany (<i>Cercocarpus betuloides</i>) • Holly leaf cherry (<i>Prunus ilicifolia</i>) • Dwarf periwinkle (<i>Vinca minor</i>) • Grass (<i>Stipa</i> spp.) <p>The Fire/Vegetation Management Plan shall be reviewed and approved by the City of Los Angeles Fire Department prior to project approval.</p>		

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	<p>4.12-1(d) Submittal of Plot Plan</p> <p>For discretionary projects with more than 300 units or located in VHFHSZ or SRA areas and where LAFD finds it necessary on the basis that existing regulations are not adequate to avoid risk of fire based on unusual site-specific, area, roadway or project characteristics, submittal of a plot plan for approval by the LAFD shall be required. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant, and entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane. In addition, the following recommendations by the LAFD relative to fire safety may be incorporated into the building plans:</p>		

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	<ul style="list-style-type: none"> • Access for Fire Department apparatus and personnel to and into all structures shall be required. • The entrance to a residence lobby must be within 50 feet of the desired street address curb face. • Where above ground floors are used for residential purposes, the access requirement shall be interpreted as being the horizontal travel distance from the street, driveway, alley, or designated fire lane to the main entrance of individual units. • The entrance or exit of all ground dwelling units shall not be more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane. No building or portion of a building shall be 		

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	<p>constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.</p> <ul style="list-style-type: none"> • The Fire Department may require additional vehicular access where buildings exceed 28 feet in height. • Building designs for multi-storied residential buildings shall incorporate at least one access stairwell off the main lobby of the building; but, in no case greater than 150 feet horizontal travel distance from the edge of the public street, private street or Fire Lane. This stairwell shall extend unto the roof. • Entrance to the main lobby shall be located off the address side of the building. 		

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	<ul style="list-style-type: none"> • Any required Fire Annunciator panel or Fire Control Room shall be located within 50 feet of the visual line of site of the main entrance stairwell or to the satisfaction of the Fire Department. • Where rescue window access is required, provide conditions and improvements necessary to meet accessibility standards as determined by the Los Angeles Fire Department. • Fire lane width shall not be less than 20 feet. When a fire lane must accommodate the operation of Fire Department aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width. • The width of private roadways for general 		

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	<p>access use and fire lanes shall not be less than 20 feet, and the fire lane must be clear to the sky.</p> <ul style="list-style-type: none"> • Fire lanes, where required, and dead ending streets shall terminate in a cul-de-sac or other approved turning area. No dead ending street or fire lane shall be greater than 700 feet in length or secondary access shall be required. • Submit plot plans indicating access road and turning area for Fire Department approval. • Adequate public and private fire hydrants shall be required. • Standard cut-corners will be used on all turns. • Any roof elevation changes in excess of three feet may require the installation of ships ladders. The Fire 		

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	<p>Department may require additional roof access via parapet access roof ladders where buildings exceed 28 feet in height, and when overhead wires or other obstructions block aerial ladder access.</p> <ul style="list-style-type: none"> • All parking restrictions for fire lanes shall be posted and/or painted prior to any Temporary Certificate of Occupancy being issued. • Plans showing areas to be posted and/or painted "FIRE LANE NO PARKING" shall be submitted and approved by the Fire Department prior to building permit application sign-off. • Electric Gates approved by the Fire Department shall be tested by the Fire Department prior to 		

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	<p>Building and Safety granting a Certificate of Occupancy.</p> <ul style="list-style-type: none"> • All new buildings shall have approved radio coverage for emergency responders within the building based upon the existing coverage levels of the public safety communication systems of the jurisdiction at the exterior of the building. This section shall not require improvement of the existing public safety communication systems. • Helicopter landing facilities are required on all high-rise buildings in the City in accordance with the recently revised Fire Protection Bureau Requirement 10. • Each standpipe in a new high-rise building shall be provided with two remotely located 		

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	<p>fire department connections (FDCs) for each zone in compliance with NFPA 14-2013, Section 7.12.2.</p> <p>4.12-2(a) Crime Prevention Unit Consultation</p> <p>For a discretionary project with more than 300 units or on a project site of more than 10 acres, the project applicant shall consult with the Los Angeles Police Department's Crime Prevention Unit regarding the incorporation of crime prevention features appropriate for the design of the project, including applicable features in the Los Angeles Police Department's Design Out Crime Guidelines. The crime prevention features recommended by the Los Angeles Police Department's Crime Prevention Unit and agreed to by the project applicant during consultation shall be made part of the project. The plans shall incorporate the design</p>		

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	<p>guidelines relative to security, semipublic and private spaces, which may include but not be limited to access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the project site if needed. These measures shall be approved by the Police Department prior to the issuance of building permits.</p> <p>4.12-2(b) Security During Construction</p> <p>During construction of discretionary projects with more than 300 units or with more than 10 acres, private security personnel shall monitor vehicle and pedestrian access to the construction areas and patrol the project site, construction fencing with</p>		

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	<p>gated and locked entry shall be installed around the perimeter of the construction site, and security lighting shall be provided in and around the construction site.</p> <p>Furthermore, temporary construction fencing shall be placed along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to keep unpermitted persons from entering the construction area. Low-level security lighting, and locked entry (e.g., padlock gates or guard-restricted access) shall be provided to limit access by the general public. Regular security patrols during non-construction hours shall also be provided. During construction activities, the contractor shall document the security measures; and the documentation shall be made available to the construction monitor.</p>		

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<p>PMM PSS-1</p> <p>In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of constructing new or physically altered school facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Where construction or expansion of school facilities is required to meet public school service ratios, require school district fees, as applicable.</p>	<p>No applicable mitigation measure.</p>	<p>No applicable mitigation measure.</p>	<p>As described in the SCEA, the Project Applicant would be required to pay developer fees to the local school district as required by law and which considered full and complete mitigation, pursuant to Senate Bill (SB) 50 and California Government Code Section 65995. Compliance with these existing regulations, which are equal to or more effective than the relevant mitigation measures identified by SCAG, would ensure that no significant impacts to school facilities would occur; therefore, incorporation of this SCAG measure into the Project is not required.</p>
<p>PMM PSL-1</p> <p>In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of construction of new or altered library facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p>	<p>No applicable mitigation measure.</p>	<p>No applicable mitigation measure.</p>	<p>As described in the SCEA, the Project Site is located in an urbanized area of the City that is already served by several existing libraries, including: Robertson Branch Library, Margaret Herrick Library, Fairfax Branch Library, and Baldwin Hills Branch Library. While the Project's residential population could result in an increased demand for library services, the Project would not create the need for new or altered library facilities; accordingly,</p>

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a) Where construction or expansion of library facilities is required to meet public library service ratios, require library fees, as appropriate and applicable, to mitigate identified CEQA impacts.			incorporation of SCAG's mitigation measure into the Project is not required.
Parks and Recreation			
<p>PMM REC-1</p> <p>In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on the use of existing neighborhood and regional parks or other recreational facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, consider increasing the accessibility to natural areas and lands for outdoor recreation from the proposed project area, in coordination with local and regional open space planning and/or responsible management agencies.</p>	No applicable mitigation measure.	No applicable mitigation measure.	As described in the SCEA, several existing parks are located in the Project Site area. Additionally, the Project includes open space and recreational facilities in accordance with the LAMC, including an approximately 4,500 square foot publicly accessible pocket park at the north portion of the Project Site. Further, in accordance with Ordinance 184,505, the Applicant shall be required to pay a fee for the purpose of developing park and recreational facilities to mitigate the Project's demand for parks and recreational facilities. Through compliance with City requirements, the provision of Code required open space and additional non required publicly accessible open space, the Project would not cause the need for new or altered parks and recreational services, the construction of which could result in significant environmental impacts.

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<p>b) Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, encourage patterns of urban development and land use which reduce costs on infrastructure and make better use of existing facilities, using strategies such as:</p> <ul style="list-style-type: none"> i. Increasing the accessibility to natural areas for outdoor recreation ii. Utilizing “green” development techniques iii. Promoting water-efficient land use and development iv. Encouraging multiple uses, such as the joint use of schools v. Including trail systems and trail segments in General Plan recreation standards. 			<p>Thus, incorporation of SCAG's mitigation measure into the Project is not required.</p>
Transportation			
<p>PMM-TRA-1</p> <p>In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation-related</p>	<p>4.14-2 Transportation Demand Management Program</p> <p>If a discretionary project will have significant impacts to VMT under LADOT Transportation Assessment Guidelines, the Applicant shall prepare a TDM program to</p>	<p>No applicable mitigation measure.</p>	<p>As described in the SCEA, a VMT analysis was conducted for the Project as part of the Transportation Assessment (see Appendix I). The Project's VMT impacts were assessed, based on the Los Angeles Department of Transportation's (LADOT) VMT calculator tool. The Project Site is</p>

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<p>impacts, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • Transportation demand management (TDM) strategies should be incorporated into individual land use and transportation projects and plans, as part of the planning process. Local agencies should incorporate strategies identified in the Federal Highway Administration’s publication: Integrating Demand Management into the Transportation Planning Process: A Desk Reference (August 2012) into the planning process (FHWA 2012). For example, the following strategies may be included to encourage use of transit and non-motorized modes of transportation and reduce vehicle miles traveled on the region’s roadways: <ul style="list-style-type: none"> ○ include TDM mitigation requirements for new developments; ○ incorporate supporting infrastructure for non- 	<p>reduce VMT impacts below the City’s project threshold to the extent feasible. TDM program elements could include measures such as unbundled parking although the exact measures will be determined when the plan is prepared. The City of Los Angeles requires that the TDM plan be prepared during construction, with the final TDM plan approved by LADOT prior to the City’s issuance of the certificate of occupancy for the Project. Implementation of the TDM plan occurs after building occupancy. TDM measures shall include but not be limited to the following examples:</p> <p>TDM strategies applicable for the residential component:</p> <p>Unbundled Parking— Unbundling parking typically separates the cost of purchasing or renting parking spaces from the cost of purchasing or renting a dwelling unit. Saving money on a dwelling unit by forgoing a</p>		<p>located in the Central Area Planning Commission (APC) area, which has a daily household VMT of 6.0 per capita and a daily work VMT of 7.6 per employee. The Project would have a daily household VMT of 4.7 per capita. Additionally, per the City’s TAG, the Project’s commercial restaurant component, which totals 7,500 square feet, is considered a local-serving commercial use. As the commercial component provides less than 50,000 square feet, the Project’s commercial component would result in a “less than significant” VMT impact. Thus, the Project’s VMT would fall below LADOT’s threshold for the Central APC and a TDM is not required. Furthermore, no potential significant impacts related to any other transportation-related issues have been identified, and no mitigation measures are required.</p> <p>Thus, incorporation of SCAG’s and the City’s mitigation measures into the Project is not required.</p>

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<p>motorized modes, such as, bike lanes, secure bike parking, sidewalks, and crosswalks;</p> <ul style="list-style-type: none"> ○ provide incentives to use alternative modes and reduce driving, such as, universal transit passes, road and parking pricing; ○ implement parking management programs, such as parking cash-out, priority parking for carpools and vanpools; ○ develop TDM-specific performance measures to evaluate project-specific and system-wide performance; ○ incorporate TDM performance measures in the decision-making process for identifying transportation investments; ○ implement data collection programs for TDM to determine the effectiveness of certain strategies and to 	<p>parking space acts as an incentive that minimizes auto ownership. Similarly, paying for parking (by purchasing or leasing a space) acts as a disincentive that discourages auto ownership and trip-making.</p> <p>TDM strategies applicable if the project includes an office component:</p> <p>Required Commute Trip Reduction Program—This strategy involves the development of an employee-focused travel behavior change program that targets individual attitudes, goals, and travel behaviors, educating participants on the impacts of their travel choices and the opportunities to alter their habits. The program typically includes elements such as a coordinated ride-sharing or carpooling program, vanpool program, alternative work schedule program, preferential carpool parking, guaranteed ride home service, and a</p>		

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<p>measure success over time; and</p> <ul style="list-style-type: none"> ○ set aside funding for TDM initiatives. ○ The increase in per capita VMT on facilities experiencing LOS F represents a significant impact compared to existing conditions. To assess whether implementation of these specific mitigation strategies would result in measurable traffic congestion reductions, implementing actions may need to be further refined within the overall parameters of the proposed Plan and matched to local conditions in any subsequent project-level environmental analysis. 	<p>program coordinator. The program requires the development of metrics to evaluate success, program monitoring, and regular reporting.</p> <p>TDM strategies applicable for both the office and residential components:</p> <p>Promotions and Marketing— This strategy involves the use of marketing and promotional tools to educate and inform travelers about site-specific transportation options and the effects of their travel choices. This strategy includes passive educational and promotional materials, such as posters, info boards, or a website with information that a traveler could choose to read at their own leisure. It can also include more active promotional strategies such as gamification.</p>		
<p>PMM TRA-2</p> <p>In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA</i></p>	<p>4.14-1 Construction Management Plans</p> <p>Any discretionary project that LADOT determines will have potential impacts to the</p>	<p>T6</p> <p>Construction activities will be managed through the implementation of a traffic control plan to mitigate the</p>	<p>As described in the SCEA, the City, as lead agency, has determined that the Project would be required to comply with City regulations that are equal to or more effective than</p>

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<p><i>Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects which may substantially impair implementation of an adopted emergency response plan or emergency evacuation plan, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Prior to construction, project implementation agencies can and should ensure that all necessary local and state road and railroad encroachment permits are obtained. The project implementation agency can and should also comply with all applicable conditions of approval. As deemed necessary by the governing jurisdiction, the road encroachment permits may require the contractor to prepare a traffic control plan in accordance with professional engineering standards prior to construction. Traffic control plans can and should include the following requirements:</p> <ul style="list-style-type: none"> • Identification of all roadway locations where special construction techniques (e.g., directional drilling or night construction) would be used to minimize impacts to traffic flow. 	<p>circulation system even with application of existing regulatory compliance measures, shall prepare a detailed Construction Management Plan (CMP), including street closure information, detour plans, haul routes, and staging plans shall be prepared and submitted to LADOT for review and approval. The Construction Management Plan will formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The Construction Management Plan shall be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and shall include those elements required by LADOT for the project, which may include but are not limited to the following:</p> <ul style="list-style-type: none"> • Providing for temporary traffic control during all 	<p>impact of traffic disruption and to ensure the safety of all users of the affected roadway. The plan will address construction duration and activities and include measures such as operating a temporary traffic signal or using flagmen adjacent to construction activities, as appropriate.</p>	<p>various SCAG and City mitigation measures. Specifically, all ingress/egress associated with the Project would be designed and constructed in conformance to all applicable City Building and Safety Department, Bureau of Engineering, and LAFD standards and requirements for design and construction. In addition, prior to issuance of a building permit, the Project Applicant would be required to submit parking and driveway plans to the Bureau of Engineering, LAFD, and LADOT for approval to ensure that the Project complies with code required emergency access and would not impair an adopted emergency response plan or emergency evacuation plan.</p> <p>Furthermore, even though there is no significant construction traffic impact, the Project would include the following project design feature, including implementation of a Construction Traffic Management Plan (PDF-TRANS-1), which would ensure that adequate emergency access exists during construction.</p>

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<ul style="list-style-type: none"> • Development of circulation and detour plans to minimize impacts to local street circulation. This may include the use of signing and flagging to guide vehicles through and/or around the construction zone. • Scheduling of truck trips outside of peak morning and evening commute hours. • Limiting of lane closures during peak hours to the extent possible. • Usage of haul routes minimizing truck traffic on local roadways to the extent possible. • Inclusion of detours for bicycles and pedestrians in all areas potentially affected by project construction. • Installation of traffic control devices as specified in the California Department of Transportation Manual of Traffic Controls for Construction and Maintenance Work Zones. • Development and implementation of access plans for highly sensitive land uses such as police and fire stations, transit stations, hospitals, and 	<p>construction activities adjacent to public right of way to improve traffic flow on public roadways (e.g., flag men)</p> <ul style="list-style-type: none"> • Prohibition of construction worker parking on any adjacent residential streets • Encouragement of carpool/vanpool of workers • Prohibitions on construction-related vehicles parking on surrounding public streets • Prohibitions on construction equipment or material deliveries within the public right-of-way • Accommodation of all equipment on site as feasible • Provisions for temporary traffic control during all construction activities adjacent to public 		<p>PDF-TRANS-1 Construction Traffic Management Plan</p> <p>Prior to the start of construction, the Project Applicant shall prepare a detailed Construction Traffic Management Plan (CTMP), including street closure information, detour plans, haul routes, and staging plans, and submit it to LADOT for review and approval. The Construction Traffic Management Plan shall include a Worksite Traffic Control Plan, which will facilitate traffic and pedestrian movement, and minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians. The Construction Traffic Management Plan and Worksite Traffic Control Plan shall be based on the nature and timing of specific construction activities and other projects in the vicinity, and shall include, but not be limited to, the following measures:</p> <ul style="list-style-type: none"> • Maintain access for land uses in the vicinity of the Project Site during construction; • Minimize obstruction of traffic lanes adjacent to the Project Site to the extent feasible;

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<p>schools. The access plans would be developed with the facility owner or administrator. To minimize disruption of emergency vehicle access, affected jurisdictions can and should be asked to identify detours for emergency vehicles, which will then be posted by the contractor. Notify in advance the facility owner or operator of the timing, location, and duration of construction activities and the locations of detours and lane closures.</p> <ul style="list-style-type: none"> • Storage of construction materials only in designated areas. • Coordination with local transit agencies for temporary relocation of routes or bus stops in work zones, as necessary. • Ensure the rapid repair of transportation infrastructure in the event of an emergency through cooperation among public agencies and by identifying critical infrastructure needs necessary for: a) emergency responders to enter the region, b) evacuation of 	<p>right-of-way to improve traffic flow on public roadways (e.g., flag men)</p> <ul style="list-style-type: none"> • Scheduling of construction activities, including deliveries, to reduce the effect on peak hour traffic flow on surrounding arterial streets • Rerouting of construction trucks to reduce travel on congested streets to the extent feasible • Provisions of safety precautions for pedestrians and bicyclists through alternate routing and protection barriers and signage • Provisions to accommodate the staging and storage of equipment • Scheduling of construction-related deliveries to reduce travel during commuter peak hours 		<ul style="list-style-type: none"> • Organize Project Site deliveries and the staging of all equipment and materials in the most efficient manner possible, and on-site where possible, to avoid an impact to the surrounding roadways; • Coordinate truck activity and deliveries to ensure trucks do not wait to unload or load at the Project Site and impact roadway traffic, and if needed, utilize an organized off-site staging area; • Provide advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation; • Prohibit construction worker or equipment parking on adjacent streets; • Provide temporary pedestrian, bicycle, and vehicular traffic controls to ensure traffic safety on public rights-of-way. These controls shall include, but not be limited to, flag people trained in pedestrian and bicycle safety at the Project Site's driveways; • Schedule construction activities to reduce the effect on traffic flow on surrounding arterial streets;

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<p>affected facilities, and c) restoration of utilities.</p> <ul style="list-style-type: none"> Enhance emergency preparedness awareness among public agencies and with the public at large. 	<ul style="list-style-type: none"> Obtain necessary permits for any truck hauling from the City prior to issuance of any permit for the project. Noticing and coordination with any nearby schools that may be affected by construction activities, including deliveries, hauling and other construction transportation, to ensure safety of school children. Ensuring all feasible safety measures are taken to accommodate safe travel of pedestrian, bicyclists, and other users of the sidewalks around the construction site, including but not limited through the following measures: <ul style="list-style-type: none"> Construction staging as to maintain pedestrian access on adjacent sidewalks 		<ul style="list-style-type: none"> Contain construction activity within the Project Site boundaries; Implement safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers as appropriate; Limit sidewalk and lane closures to the maximum extent possible, and avoid peak hours to the extent possible. Where such closures are necessary, the Project's Worksite Traffic Control Plan will identify the location of any sidewalk or lane closures and identify all traffic detours and control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activity; Schedule construction related deliveries, haul trips, etc., so as to occur outside the commuter peak hours to the extent feasible; and/or Prepare a haul truck route program that specifies the construction truck routes to and from the Project Site. <p>Compliance with existing regulations and implementation of the above project design feature are</p>

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	<p>throughout all construction phases.</p> <ul style="list-style-type: none"> • Maintaining adequate and safe pedestrian protection, including physical separation (including utilization of barriers such as K-Rails or scaffolding, etc.) from work space and vehicular traffic and overhead protection, due to sidewalk closure or blockage, at all times. • Providing temporary pedestrian facilities adjacent to the Project Site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility. • Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects. 		<p>equal to or more effective than the relevant mitigation measures identified by SCAG and the City; therefore, incorporation of these SCAG and City mitigation measures into the Project is not required.</p>

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	<ul style="list-style-type: none"> • Keeping sidewalk open during construction until only when it is absolutely required to close or block sidewalk for construction staging. • Reopening the sidewalk as soon as reasonably feasible taking construction and construction staging into account. 		
No applicable mitigation measure.	No applicable mitigation measure.	<p>T1 Los Angeles Department of Transportation (LADOT) will adjust traffic signal timing after the implementation of the proposed project (both along project routes and parallel roadways if traffic diversions have occurred as a result of the proposed project). This adjustment would be necessary, especially at the intersections where roadway striping would be modified. Signal timing adjustment could reduce traffic impacts at impacted intersections. (LADOT routinely makes traffic</p>	<p>As described in the SCEA, the Project would not result in any significant transportation, VMT, circulation, or emergency access impacts, and thus the City's Mobility Plan 2035 mitigation measures, which cover these impact areas, would not apply to the Project.</p> <p>Additionally, the Project would not modify roadway widths or otherwise affect the geometric design of roads surrounding the Project Site, nor would it implement any features that would obstruct sight distance or paths of vehicular, pedestrian, or bicycle travel. The Project driveways would have the capacity to</p>

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		signal timing changes and signal optimization on an as needed basis to accommodate the changes in traffic volumes to reduce congestion and delay in the City.)	<p>accommodate the Project trips and, therefore, no queue spillover into the public ROW is anticipated. The Project would not preclude or interfere with the implementation of future roadway improvements benefiting transit, pedestrians, or bicycles. As such, the Project would not result in any hazards from the design or operation and would not result in a significant impact.</p> <p>Thus, the SCEA is consistent with the City's applicable mitigation measure regarding Transportation, and incorporation of the City's mitigation measure into the Project is not required.</p>
No applicable mitigation measure.	No applicable mitigation measure.	<p>T2 The City shall implement appropriate Transportation Demand Management (TDM) measures in the City of Los Angeles including potential trip-reducing measures such as bike share strategies, bike parking, expansion of car share programs near high density areas, bus stop improvements (e.g. shelters and "next bus" technologies), crosswalk</p>	As described in the SCEA, the Project would not result in any significant transportation, VMT, circulation, or emergency access impacts, and thus the Mobility Plan 2035 mitigation measures, which cover these impact areas, would not apply to the Project. Nevertheless, the Project incorporates several TDM measures to reduce the number of single occupancy vehicle trips to the Project Site, including a reduced parking supply, unbundled

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		improvements, pedestrian wayfinding signage, etc.	<p>parking, and the provision of bicycle parking per the LAMC, as Project design features.</p> <p>Thus, the SCEA is consistent with the City's applicable mitigation measure regarding Transportation, and incorporation of the City's mitigation measure into the Project is not required.</p>
No applicable mitigation measure.	No applicable mitigation measure.	<p>T3</p> <p>In areas where implementation of the proposed project could potentially result in diversion of traffic to adjacent residential streets, LADOT shall monitor traffic on identified residential streets, upon request submitted through the Council Office, to determine if traffic diversion occurs. If traffic on residential streets is found to be significantly impacted, in accordance with LADOT's Traffic Study Policies and procedures, LADOT will work with neighborhood residents to identify and implement appropriate traffic calming measures.</p>	<p>As described in the SCEA, the Project would not result in any significant transportation, VMT, circulation, or emergency access impacts, and thus the Mobility Plan 2035 mitigation measures, which cover these impact areas, would not apply to the Project. No streets adjacent to the Project Site are designated as parts of the Mobility Plan's Neighborhood Enhanced Network. The Project would not affect travel speed or safety, impede the development of any future improvements, or interfere with the neighborhood character of any of these streets. Thus, the SCEA is consistent with the City's applicable mitigation measure regarding Transportation, and incorporation of</p>

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			the City's mitigation measure into the Project is not required.
No applicable mitigation measure.	No applicable mitigation measure.	<p>T4</p> <p>In areas where the implementation of the proposed project could potentially affect transportation systems managed by other agencies, such as Caltrans or Metro, or neighboring jurisdictions, the City of Los Angeles shall coordinate with these entities to identify transportation improvements in accordance with the goals and policies of Mobility Plan 2035 and seek opportunities to jointly pursue funding. Mobility solutions shall be focused on safety, enhancing mobility options, improving access to active modes, and implementing TDM measures to achieve both local and regional transportation and sustainability goals.</p>	<p>As described in the SCEA, the Project would not result in any significant transportation, VMT, circulation, or emergency access impacts, and thus the Mobility Plan 2035 mitigation measures, which cover these impact areas, would not apply to the Project. Adjacent to the Project Site, La Cienega Boulevard south of Olympic Boulevard is designated as part of the Mobility Plan's Transit Enhanced Network. The Project would develop transit-accessible residential and commercial space within an identified Transit Priority Area and High-Quality Transit Area. As confirmed by the Project's traffic assessment, there is sufficient capacity within the existing and future transit system to accommodate the additional ridership generated by the Project. Thus, the SCEA is consistent with the City's applicable mitigation measure regarding Transportation, and incorporation of the City's mitigation measure into the Project is not required.</p>

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No applicable mitigation measure.	No applicable mitigation measure.	<p>T5 LADOT, Los Angeles Fire Department (LAFD) and Department of City Planning (DCP) shall coordinate and review design plans involving lane reallocation to ensure that emergency response access is adequately maintained (for example by expanding the Fire Preemption System).</p>	<p>As described in the SCEA, the Project would not result in any significant transportation, VMT, circulation, or emergency access impacts, and thus the Mobility Plan 2035 mitigation measures, which cover these impact areas, would not apply to the Project. The Project's driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access both during construction as well as after completion of the Project. Emergency access to the Project Site and surrounding area would be maintained both during and post-construction. Therefore, the Project would not result in inadequate emergency access during construction or operation. Thus, the SCEA is consistent with the City's applicable mitigation measure regarding Transportation, and incorporation of the City's mitigation measure into the Project is not required.</p>
Tribal Cultural Resources			

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<p>PMM TCR-1</p> <p>In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on tribal cultural resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Avoidance and preservation of the resources in place, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria;</p> <p>b) Treating the resource with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following: protecting the cultural character and integrity of the resource; protecting the traditional use of the resource; and protecting the confidentiality of the resource;</p>	<p>4.15-1(a) Native American Consultation and Monitoring for Discretionary Projects</p> <p>All discretionary projects that involve ground disturbing activities in previously undisturbed soils, shall prepare a cultural resources assessment and do a record search with a study area of no less than 0.5 mile around the project area. Projects conducted in culturally and historically sensitive areas, as determined by a Qualified Archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for Archaeologist, should include a record search with a study area of no less than 1 mile around the project area.</p> <p>Notification shall be provided to California Native American tribes that are traditionally and culturally affiliated with the geographic area of the project site and have submitted a written request to the Department of City Planning to</p>	<p>No applicable mitigation measure.</p>	<p>As described in the SCEA, a Sacred Land Files (SLF) record search was conducted through the Native American Heritage Commission, which received negative results (refer to SCEA Appendix K). The City developed the following standard condition of approval to ensure that if any tribal cultural resources are found during construction of the Project, they will be handled in compliance with state law so that any potential impacts would be less than significant. In accordance with the condition of approval, all activities would be conducted in accordance with regulatory requirements.</p> <p>Condition of Approval Inadvertent discovery of tribal cultural resources: In the event that objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities (excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil or a similar activity), all such activities shall</p>

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<p>c) Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places; and protecting the resource.</p>	<p>be notified of proposed projects in that area. Should projects have potential to impact cultural resources, as determined during the environmental assessment or Tribal consultation, a Cultural Resources Monitoring Program (CRMP) shall be prepared by Qualified Archaeologist, in consultation with all interested Tribes, prior to the commencement of any and all ground-disturbing activities for the Project, including any archaeological testing. The CRMP shall include compliance with 4.15-1(b) and will provide details regarding the process for in-field treatment of inadvertent discoveries and the disposition of inadvertently discovered non-funerary resources and shall be consistent with the treatment of unique archaeological resources in PRC 21083.2.</p> <p>4.15-1(b) Discovery of Potential Tribal Cultural Resources</p>		<p>temporarily cease on the project site until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below:</p> <ul style="list-style-type: none"> • Upon a discovery of a potential tribal cultural resource, the Applicant shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project; (2) and the Department of City Planning at (213) 978-1290. • If the City determines, pursuant to PRC Section 21074 (a)(2), that the object or artifact appears to be tribal cultural resource, the City shall provide any effected tribe a reasonable period of time, not less than 30 days, to conduct a site visit and make recommendations to the Applicant and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources. • The Applicant shall implement the tribe's recommendations if a qualified archaeologist and by a

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	<p>In the event that Tribal Cultural Resources are discovered during Project activities, whether or not a tribal monitor is present, and there is no CRMP or the CRMP does not cover treatment of inadvertent discovery, all work within a 50-foot buffer of the find shall cease and a Qualified Archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology shall assess the find. Tribes that are culturally and historically affiliated with the Project area and have requested consultation shall be notified, should any potential tribal cultural resource be discovered during project implementation. Construction personnel shall not collect or move any tribal resources. Construction activity may continue unimpeded on other portions of the project site. Unless agreed otherwise during the tribal consultation process or in a CRMP, if tribal cultural resources are</p>		<p>culturally affiliated tribal monitor, both retained by the City and paid for by the Applicant, reasonably concludes that the tribe's recommendations are reasonable and feasible.</p> <ul style="list-style-type: none"> • The Applicant shall submit a tribal cultural resource monitoring plan to the City that includes all recommendations from the City and any effected tribes that have been reviewed and determined by the qualified archaeologist and by a culturally affiliated tribal monitor to be reasonable and feasible. The Applicant shall not be allowed to recommence ground disturbance activities until this plan is approved by the City. • If the Applicant does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist or by a culturally affiliated tribal monitor, the Applicant may request mediation by a mediator agreed to by the Applicant and the City who has the requisite professional qualifications and experience to mediate such a dispute. The Applicant shall pay any costs associated with the mediation.

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	<p>discovered during construction, the applicant and/or owner shall retain a Qualified Tribal Monitor (as approved by the Tribe) if requested by the Tribe. Any and all archaeological/cultural documents created as a part of the Project (isolate records, site records, survey reports, testing reports, and monitoring reports) should be provided to consulting Tribes. Any tribal cultural resources discovered shall be treated with appropriate dignity and protected and preserved as appropriate with the agreement of the Tribal Representative and in accordance with federal, state, and local guidelines. If not otherwise provided in the CRMP, the Lead Agency and/or applicant shall, in good faith, provide all consulting Tribes the opportunity to consult on the disposition and treatment of resources. The location of the find of tribal cultural resources and the type and nature of the find will not be published, except to provide</p>		<ul style="list-style-type: none"> • The Applicant may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by the qualified archaeologist and by a culturally affiliated tribal monitor and determined to be reasonable and appropriate. • Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton. <p>Inadvertent discovery of Human Remains: In the event that human skeletal remains are encountered at the project site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, pursuant to State Health and Safety Code Section 7050.5 which requires that no further ground disturbance</p>

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	<p>information to the Qualified Archaeologist, tribal representatives, and public agencies with jurisdiction or responsibilities related to the resources. An agreement will be reached with the Tribal Representative to mitigate or avoid any significant impacts to identified tribal cultural resources. Absent an agreement with the Tribal Representative, as provided in Public Resources Code Section 21083.2, the find should be preserved in place or left in an undisturbed state unless the Project would damage the resource. When preserving in place or leaving in an undisturbed state is not possible, excavation should not occur until testing or studies prepared by a Qualified Archaeologist have adequately documented the recovery of scientifically consequential information from and about the resource. Construction activity may continue unimpeded on other portions of the project site if cleared by the Qualified</p>		<p>shall occur until the County Coroner has made the necessary findings as to the origin and disposition pursuant to California Public Resources Code Section 5097.98. In the event human skeletal remains are discovered during construction or during any ground disturbance activities, the following procedures shall be followed:</p> <ul style="list-style-type: none"> • Stop immediately and contact the County Coroner: 1104 N. Mission Road Los Angeles, CA 90033 (323) 343-0512 (8 a.m. to 5 p.m. Monday through Friday), or (323) 343-0714 (after hours, Saturday, Sunday, and holidays) • If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the NAHC. • The NAHC will immediately notify the person it believes to be the most likely descendant (MLD) of the deceased Native American. • The MLD has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of

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	<p>Tribal Monitor or Qualified Archaeologist. Ground Disturbance Activities in the area where resources were found may commence once the identified resources are properly assessed and processed by a Tribal Representative or, if no Tribal Representative is identified, a Qualified Archaeologist.</p> <p>The measure shall be shown on plans.</p>		<p>the human remains and grave goods.</p> <ul style="list-style-type: none"> • If the Applicant does not accept the MLD's recommendations, the owner or the MLD may request mediation by the NAHC. <p>Compliance with these existing regulations, which are equal to or more effective than the relevant mitigation measures identified by SCAG and the City, would ensure that no significant impacts regarding tribal cultural resources would occur; therefore, incorporation of these SCAG and City mitigation measures into the Project is not required.</p>
Utilities and Service Systems			
<p>PMM USSW-2</p> <p>In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce the generation of solid waste, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p>	<p>No applicable mitigation measure.</p>	<p>No applicable mitigation measure.</p>	<p>As described in the SCEA, the City, as lead agency, has determined that the Project would be required to comply with regulations that are equal to or more effective than SCAG's mitigation measure. Specifically, the Project would be required to reduce the total estimated waste output through established City recycling programs, and would also be subject to the City's Recycling Space Allocation Ordinance (Ordinance No.</p>

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<p>Integrate green building measures with CALGreen (California Building Code Title 24) into project design, including but not limited to the following:</p> <ul style="list-style-type: none"> a) Reuse and minimization of construction and demolition (C&D) debris and diversion of C&D waste from landfills to recycling facilities. b) Inclusion of a waste management plan that promotes maximum C&D diversion. c) Source reduction through (1) use of materials that are more durable and easier to repair and maintain, (2) design to generate less scrap material through dimensional planning, (3) increased recycled content, (4) use of reclaimed materials, and (5) use of structural materials in a dual role as finish material (e.g., stained concrete flooring, unfinished ceilings, etc.). d) Reuse of existing structure and shell in renovation projects. e) Development of indoor recycling program and space. f) Discourage the siting of new landfills unless all other waste reduction and prevention actions have been fully explored. If landfill siting or expansion is necessary, site landfills with an adequate landfill-owned, undeveloped land buffer to minimize the potential 			<p>171,687), which establishes requirements for the inclusion of recycling areas or rooms within development projects. In addition, in compliance with existing City standards and regulations, the Project would be required to recycle construction and demolition (C&D) waste to the maximum extent possible pursuant to Ordinance No. 181,519 (Citywide Construction and Demolition Waste Recycling Ordinance) that requires all mixed C&D waste generated within City limits to be taken to City certified C&D waste processors. Compliance with these regulations would ensure that construction waste is recycled and disposed of properly. Overall, compliance with existing regulations would ensure that the Project's waste disposal needs are reduced and can be sufficiently met by local landfills, thereby achieving consistency with this mitigation measure.</p> <p>Project construction waste would be hauled by permitted haulers and taken only to City-certified C&D processing facilities that are monitored for</p>

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<p>adverse impacts of the landfill in neighboring communities.</p> <p>g) Discourage exporting of locally generated waste outside of the SCAG region during the construction and implementation of a project. Encourage disposal within the county where the waste originates as much as possible. Promote green technologies for long-distance transport of waste (e.g., clean engines and clean locomotives or electric rail for waste-by-rail disposal systems) and consistency with SCAQMD and Connect SoCal policies can and should be required.</p> <p>h) Encourage waste reduction goals and practices and look for opportunities for voluntary actions to exceed the 80 percent waste diversion target.</p> <p>i) Encourage the development of local markets for waste prevention, reduction, and recycling practices by supporting recycled content and green procurement policies, as well as other waste prevention, reduction and recycling practices.</p> <p>j) Develop ordinances that promote waste prevention and recycling activities such as: requiring waste prevention and recycling efforts at all large events and venues; implementing recycled content procurement programs; and developing</p>			<p>compliance with existing regulations. Project generated C&D waste would represent a very small portion of the waste disposal capacity in the region. In addition, waste generated by the Project would be subject to State and local recycling and waste diversion strategies and policies including the City's Zero Waste Plan goal of achieving a 90 percent solid waste diversion rate by 2025.</p> <p>Compliance with these existing regulations, which are equal to or more effective than the relevant mitigation measures identified by SCAG, would ensure that no significant impacts regarding solid waste would occur; therefore, incorporation of these SCAG mitigation measures into the Project is not required.</p>

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<p>opportunities to divert food waste away from landfills and toward food banks and composting facilities.</p> <p>k) Develop and site composting, recycling, and conversion technology facilities that have minimum environmental and health impacts.</p> <p>l) Integrate reuse and recycling into residential industrial, institutional and commercial projects.</p> <p>m) Provide education and publicity about reducing waste and available recycling services.</p> <p>n) Implement or expand city or county-wide recycling and composting programs for residents and businesses. This could include extending the types of recycling services offered (e.g., to include food and green waste recycling) and providing public education and publicity about recycling services.</p>			
<p>PMM-USWW-1</p> <p>In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on utilities and service systems, particularly for construction of</p>	<p>No applicable mitigation measure.</p>	<p>No applicable mitigation measure.</p>	<p>As described in the SCEA, the Project's estimated wastewater generation of approximately 36,730 gallons per day can be accommodated by the existing remaining daily treatment capacity of the Hyperion Treatment Plant. Additionally, the Project would be required to comply with the Los Angeles County Department of</p>

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<p>wastewater facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • During the design and CEQA review of individual future projects, implementing agencies and projects sponsors shall determine whether sufficient wastewater capacity exists for the proposed projects. There CEQA determinations must ensure that the proposed development can be served by its existing or planned treatment capacity. If adequate capacity does not exist, project sponsors shall coordinate with the relevant service provider to ensure that adequate public services and utilities could accommodate the increased demand, and if not, infrastructure improvements for the appropriate public service or utility shall be identified in each project’s CEQA documentation. The relevant public service provider or utility shall be responsible for undertaking project-level review as 			<p>Public Works Hydrology Manual for designing and hydrology and drainage infrastructure. The Hydrology Manual requires that a storm drain conveyance system be designed for a 25-year storm even and that the combined capacity of a storm drain and street flow system accommodate flow from a 50-year storm event. The Project would be required by the City to control stormwater runoff from the Project Site to meet these requirements.</p> <p>The Bureau of Sanitation estimated the wastewater discharge from the Project and analyzed the sewer availability around the Site. The sewer infrastructure in the vicinity of the Project includes an existing 42-inch line on La Cienega Boulevard. The sewage from the existing 42-inch line feeds into a 39-inch line on Crescent Heights Boulevard before discharging into a 48-inch sewer line on Crescent Heights Boulevard. Based on estimated flows, it appears the sewer system might be able to accommodate the total flow for the Project. Further detailed gauging and evaluation will be needed as part of the permit process</p>

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<p>necessary to provide CEQA clearance for new facilities.</p>			<p>to identify a specific sewer connection point. If the public sewer lacks sufficient capacity, then the developer will be required to build sewer lines to a point in the sewer system with sufficient capacity. A final approval for sewer capacity and connection permit will be made at the time. Ultimately, this sewage flow will be conveyed to the Hyperion Water Reclamation Plant, which has sufficient capacity for the Project/</p> <p>The Project would not require or result in the relocation or construction of new or expanded wastewater treatment or storm drainage facilities, the construction or relocation of which could cause significant environmental effects. No significant impacts related to these issues have been identified, and no mitigation measures are required. Thus, incorporation of the SCAG mitigation measure into the Project is not required.</p>
<p>PMM USWS-1</p> <p>In accordance with provisions of sections 15091(a)(2) and</p>	<p>No applicable mitigation measure.</p>	<p>No applicable mitigation measure.</p>	<p>As described in the SCEA, the Project would connect to the existing water conveyance infrastructure near the Project Site, and would</p>

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<p>15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to ensure sufficient water supplies, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Reduce exterior consumptive uses of water in public areas, and should promote reductions in private homes and businesses, by shifting to drought-tolerant native landscape plantings, using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives.</p> <p>b) Promote the availability of drought-resistant landscaping options and provide information on where these can be purchased. Use of reclaimed water especially in median landscaping and hillside landscaping can and should be implemented where feasible.</p> <p>c) Implement water conservation best practices such as low-flow toilets, water-efficient clothes washers, water system audits, and leak detection and repair.</p> <p>d) For projects located in an area with existing reclaimed water conveyance infrastructure and excess reclaimed water capacity, use reclaimed water for</p>			<p>consume approximately 36,730 gallons of water per day. According to Los Angeles Department of Water and Power’s (LADWP) 2020 Urban Water Management Plan, the City can provide the needed water from its existing system pursuant to the provisions in 2020 UWMP.</p> <p>Additionally, the Project Applicant would be required to comply with the City’s water efficiency standards to minimize water usage. Prior to issuance of a building permit, the Project Applicant would be required to consult with LADWP to determine Project-specific water supply service needs and all water conservation measures that shall be incorporated into the Project.</p> <p>Therefore, the City would not require new water infrastructure or supply to meet the demand from the Project, and no impacts would occur. Thus, incorporation of the SCAG mitigation measure into the Project is not required.</p>

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<p>non-potable uses, especially landscape irrigation. For projects in a location planned for future reclaimed water service, projects should install dual plumbing systems in anticipation of future use. Large developments could treat wastewater onsite to tertiary standards and use it for non-potable uses onsite.</p>			
Wildfire			
<p>PMM WF-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to wildfire risk, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Launch fire prevention education for local cities and counties such that local fire agencies, homeowners, as well as commercial and industrial businesses are aware of potential sources of fire ignition and the related procedures to curb or lessen any activities that might initiate fire ignition.</p> <p>b) Ensure structures in high fire risk areas are built to current state and federal standards which serve to greatly</p>	<p>4.17-3 Undergrounding of Power Lines in and Near an SRA and VHFHZs</p> <p>For all discretionary applications for development located in or within one mile of an SRA or VHFHSZs, that involve or require the installation of new power lines shall be required to install the new power line underground. Prior to the issuance of a grading or building permit, the applicant shall submit plans for undergrounding of power lines.</p> <p>See also 4.12-1(c) Hillside Fire/Vegetation Management Plan above.</p>	<p>No applicable mitigation measure.</p>	<p>As described in the SCEA, the Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones, and no wildfire-related impacts would occur. Thus, incorporation of the SCAG and City mitigation measures into the Project is not required.</p>

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<p>increase the chances the structure will survive a wildfire and also allow for people to shelter-in-place.</p> <p>c) Improve road access for emergency response and evacuation so people can evacuate safely and timely when necessary.</p> <p>d) Improve, and educate regarding, local emergency communications and notifications with residents and businesses.</p> <p>e) Enforce defensible space regulations to keep overgrown and unmanaged vegetation, accumulations of trash and other flammable material away from structures.</p> <p>f) Provide public education about wildfire risk and fire prevention measures, and safety procedures and practices to allow for safe evacuation and/or options to shelter-in-place</p> <p>g) Include external sprinklers with an independent water source to reduce flammability of structures.</p> <p>h) Include local solar power paired with batteries to reduce power flow in electricity lines.</p> <p>i) For developments in high fire-prone areas, have a fire protection plan for residents and businesses.</p>			

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<p>j) Provide fire hazard and fire safety education for homeowners in or near fire hazard areas.</p> <p>k) Developments in fire-prone areas should have fire-resistant feature, such as:</p> <ul style="list-style-type: none"> • Ember-resistant vents • Fire-resistant roofs • Surrounding defensible space • Proper maintenance and upkeep of structures and surrounding area 			
<p>PMM WF-2</p> <p>In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to wildfire risk, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) New development or infrastructure activity within very high hazard severity zones or SRAs shall be required to:</p> <ul style="list-style-type: none"> • Submit a fire protection plan including the designation of fire watch staff; 	<p>4.17-1 Hillside Construction Staging and Parking Plan</p> <p>For discretionary projects for development located in or adjacent to an SRA or VHFHSZ, where LAFD finds it necessary to add additional conditions above existing regulations to reduce the risk of construction-related activities impairing an emergency response plan or emergency evacuation plan, prior to the issuance of a grading or building permit, the applicant shall submit a Construction Staging and Parking Plan to the Department of Building and Safety and the Fire Department</p>	<p>No applicable mitigation measure.</p>	<p>As described in the SCEA, the Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones, and no impacts would result. Thus, incorporation of the SCAG and City mitigation measures into the Project is not required.</p>

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<ul style="list-style-type: none"> • Maintain water and other fire suppression equipment designated solely for firefighting on site for any construction and maintenance activities; • Locate construction and maintenance equipment in designated “safe areas” such that they do not discharge combustible materials; and • Designate trained fire watch staff during project construction to reduce risk of fire hazards. 	<p>for review and approval. The plan shall identify where all construction materials, equipment, and vehicles will be stored through the construction phase of the project, as well as where contractor, subcontractor, and laborers will park their vehicles so as to prevent blockage of two-way traffic on streets in the vicinity of the construction site. The Construction Staging and Parking Plan shall include, but not be limited to, the following:</p> <ul style="list-style-type: none"> • No construction equipment or material shall be permitted to be stored within the public right-of-way. • If the property fronts on a designated Red Flag Street, on noticed “Red Flag” days, all workers shall be shuttled from an off-site area, located on a non-Red Flag Street, to and from the site in order to keep roads open on Red Flag days. 		

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	<ul style="list-style-type: none"> • During the Excavation and Grading phases, only one truck hauler shall be allowed on the site at any one time. The drivers shall be required to follow the designated travel plan or approved Haul Route. • Truck traffic directed to the project site for the purpose of delivering materials, construction-machinery, or removal of graded soil shall be limited to off-peak traffic hours, Monday through Friday only. No truck deliveries shall be permitted on Saturdays or Sundays. • All deliveries during construction shall be coordinated so that only one vendor/delivery vehicle is at the site at one time, and that a construction 		

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	<p>supervisor is present at such time.</p> <ul style="list-style-type: none"> A radio operator shall be on-site to coordinate the movement of material and personnel, in order to keep the roads open for emergency vehicles, their apparatus, and neighbors. <p>During all phases of construction, all construction vehicle parking and queuing related to the project shall be as required to the satisfaction of the Department of Building and Safety, and in substantial compliance with the Construction Staging and Parking Plan, except as may be modified by the Department of Building and Safety or the Fire Department.</p>		