



DEPARTMENT OF CITY PLANNING

RECOMMENDATION REPORT

City Planning Commission

Date: April 10, 2025

Time: After 8:30 a.m.*

Place: *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/commissions-boards-hearings> and/or by contacting cpc@lacity.org.*

Public Hearing: Initial public hearing completed on January 23, 2025

Appeal Status: Density Bonus Off-menu incentives are not further appealable.

Case No.: CPC-2024-5977-DB-VHCA

CEQA No.: ENV-2024-5978-CE

Incidental Cases: None

Related Cases: None

Council No.: 5 – Katy Young
Yaroslavsky

Community Plan

Area: Wilshire

Specific Plan: n/a

Certified NC: Mid City West

Zone: C2-1VL

Land Use General Commercial

Designation:

Applicant: Samuel Einhorn – 361 La Brea LLC

Representative: Daniel Ahadian
NUR – Development | Consulting

Expiration Date: April 11, 2025

Multiple Approval: N/A

PROJECT LOCATION: 361 North La Brea Avenue, Los Angeles, CA 90036

PROPOSED PROJECT: The proposed project involves the demolition of an existing car rental facility and parking lot for the construction of a new 40,505 square foot, 75 foot tall (82-foot 2-inches as measured to the top of the elevator tower), 6-story, 40 unit, mixed-use building containing five (5) units set aside for Very Low-Income households. The project proposes 2,143 square feet of ground floor commercial area, 16 parking stalls, 43 bicycle parking spaces, and 4,832 square feet of Open Space.

REQUESTED ACTIONS:

- 1) Pursuant to CEQA Guidelines, Section 15332, Class 32, an Exemption from CEQA, and that there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies;
- 2) Pursuant to Los Angeles Municipal Code (LAMC) Chapter 1 Section 12.22-A,25(g) and Government Code Section 65915(d)(2)(F), a **Density Bonus/Affordable Housing Incentive Program Compliance Review** to permit a housing development consisting of 40 dwelling units, with 5 affordable units set aside for Very Low Income households, requesting the following Off-Menu Incentives:
 - a. An Off Menu Incentive to permit a Floor Area Ratio (FAR) increase of up to 3.91:1, in lieu of the 1.5:1 FAR otherwise permitted in the C2-1VL zone;

- b. An Off-Menu Incentive to permit a building height of 75 feet in lieu of the 45 feet required per the C2-1VL zone;
- c. An Off-Menu Incentive to permit relief from the 33-foot Transitional Height limit for the portion of the site that is within 199 feet of a residential zone; and
- d. An Off-Menu Incentive to allow a southerly side yard setback of five (5) feet in lieu of the 9 (nine) feet otherwise required.

RECOMMENDED ACTIONS:

- 1) **Determine**, that based on the whole of the administrative record, the Project is exempt from CEQA pursuant to CEQA Guidelines, Section, 15332, and there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies;
- 2) **Approve**, pursuant to LAMC Section 12.22 A.25, a **Density Bonus/Affordable Housing Incentive Program Compliance Review** to permit a housing development project consisting of 40 dwelling units, of which 5 units will be set aside for Very Low Income households for a period of 55 years, with the following **Off-Menu Incentives**:
 - a. An Off-Menu Incentive to permit an increase in floor area ratio (FAR) to 3.91:1, in lieu of the 1.5:1 FAR otherwise permitted in the C2-1VL zone;
 - b. An Off-Menu Incentive to permit a building height of 75 feet in lieu of the 45 feet required per the C2-1VL zone;
 - c. An Off-Menu Incentive to permit relief from the 33-foot Transitional Height limit for the portion of the site that is within 199 feet of a residential zone; and
 - d. An Off-Menu Incentive to allow a southerly side yard setback of five (5) feet in lieu of the 9 (nine) feet otherwise required.
- 3) **Adopt** the attached Conditions of Approval; and
- 4) **Adopt** the attached Findings.

VINCENT P. BERTONI, AICP
Director of Planning



Jane Choi, AICP
Principal City Planner

 for

Deborah Kahlen, AICP
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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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PROJECT ANALYSIS

PROJECT SUMMARY

The proposed project involves the demolition of an existing car rental facility and associated surface parking lot for the construction of a new 40,505 square foot, 75-foot tall (82-foot 2-inches as measured to the top of the elevator tower), 6-story, 40-unit, mixed-use building containing five (5) units set aside for Very Low-Income households, as shown in **Figure 1** below. The mixed-use development will consist of 18 one-bedroom units, and 22 two-bedroom units with approximately 2,143 square feet of ground floor commercial space intended for a future restaurant. The pedestrian entrance for the commercial space is located at the corner of Oakwood Avenue and La Brea Avenue, whereas the pedestrian entrance for the residential units is closer to the residential neighborhood along Oakwood Avenue. The ground floor features the commercial space, a residential lobby, and a trash room, while the second through sixth floors contain residential units. The project proposes 4,832 square feet of Open Space with approximately 3,964 square feet located on a roof level deck. The project also proposes 10 recreation rooms with two located on each floor, which approximately 1,138 square feet is accredited towards the Open Space of the project. A total of 10 trees are proposed for the project, six (6) of which are to be located along the public right-of-way on La Brea Avenue and Oakwood Avenue, and four (4) of which are to be located on the second floor.

The proposed project will provide reduced vehicular parking in accordance with the provisions of Assembly Bill 2097 (AB 2097) and proposes 16 parking stalls and 43 bicycle parking spaces. Vehicular parking is accessible from a garage entrance along the rear alley, reducing the amount of traffic exiting directly onto major roads, as shown in the first-floor plan in **Figure 2**. Long term bicycle parking is accessible through the rear alley, La Brea Avenue, and Oakwood Avenue. Short term bicycle parking is located along Oakwood Avenue and La Brea Avenue near the retail and residential entrances.



Figure 1: Rendering of the proposed project, view from the corner of La Brea and Oakwood.

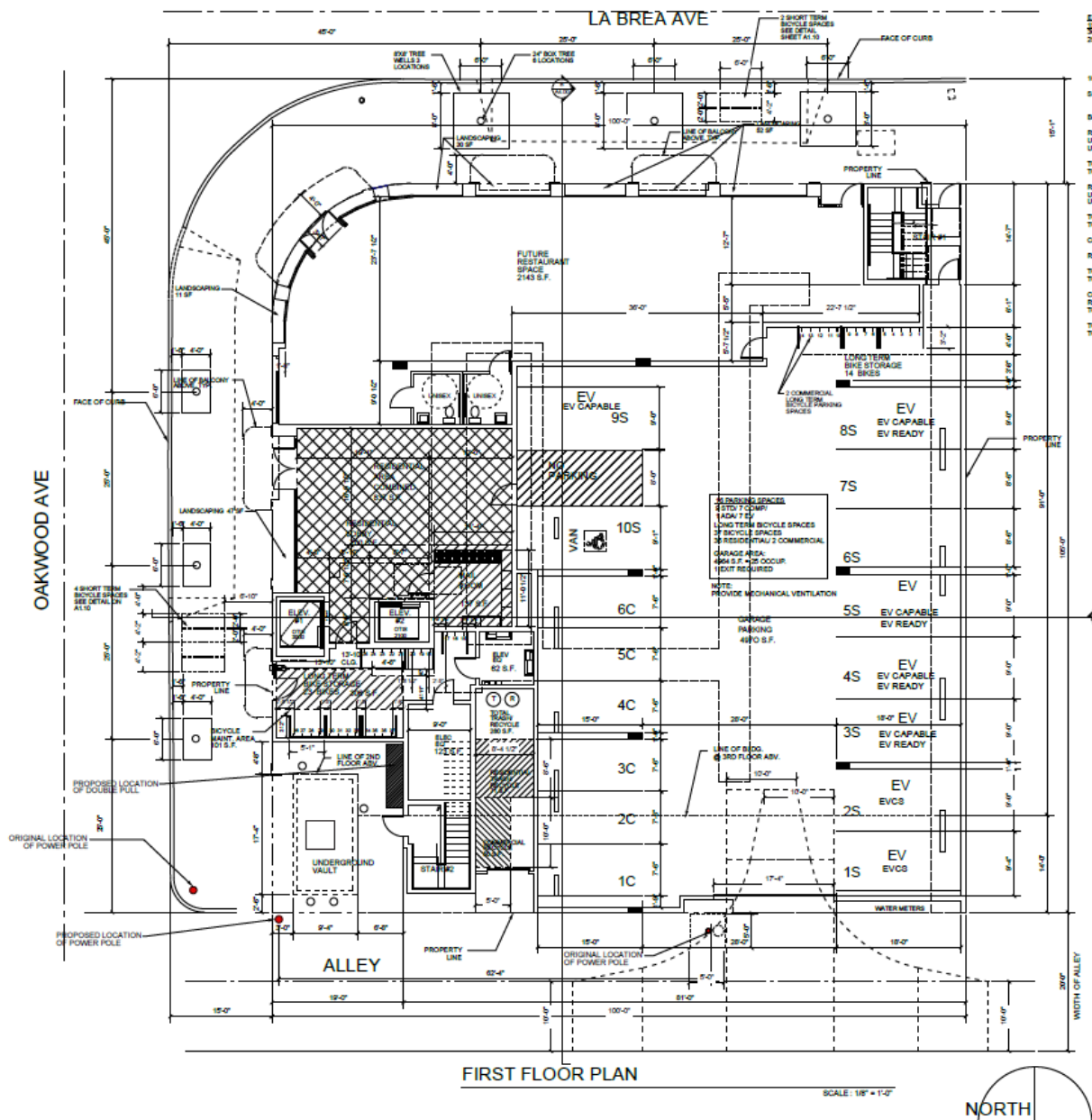


Figure 2: First Floor Plan

In order to facilitate the development of the proposed project, the applicant is requesting the following discretionary actions: 1) a Density Bonus for a Housing Development containing a total of 40 dwelling units (with 5 units – 17 percent of the base density [29 units] set aside for Very Low Income Households), along with the following four Off-menu Incentives: a) an Off-Menu Incentive to permit a Floor Area Ratio (FAR) of up to 3.91:1 FAR in lieu of the 1.5:1 FAR otherwise permitted; b) an Off-Menu Incentive to permit a height increase of six stories and up to 75 feet as measured to the top of the parapet in lieu of the 45 feet otherwise permitted; c) an Off-Menu Incentive to allow relief from the 33 foot Transitional Height limit of the portion of the site that is within 199 feet of R1 zoning; and d) an Off-Menu Incentive to permit a southerly side yard setback of 5-feet in lieu of the 9 feet otherwise required.

PROJECT BACKGROUND

Project Site

The subject property is a rectangular-shaped site comprised of two (2) parcels, totaling approximately 10,393 square feet of lot area or approximately 0.239 acres. The property has street frontages of approximately 100 feet along La Brea Avenue and 105 feet along Oakwood Avenue. The site is currently improved with a one-story commercial building operating as a car rental facility, which does not contain any residential units.



Figure 3: Aerial view of the proposed project site looking southwest.

Surrounding Properties

As shown in **Figure 3** above and **Figure 4** below, the surrounding area consists to the north, south, and west along La Brea Avenue is zoned C2-1VL and is developed of one to two-story commercial buildings with bank, retail store, and worship uses. The properties to the west behind the project are zoned R2-1 and R1V2 and developed with two-story multifamily residential structures.

General Plan Land Use Designation and Zoning

The proposed 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 with corresponding zones of C1, C1.5, C2, C4, P, CR, RAS3, and RAS4. As shown in **Figure 4**, the proposed project site is zoned C2-

1VL and is thus consistent with the range of zones under the corresponding land use designation. The C2-1VL Zone limits the project's density to one (1) dwelling unit per 400 square feet of lot area. Additionally, the Floor Area Ratio (FAR) permitted in the C2-1VL Zone is 1.5 to 1.

The proposed project site is located within a Transit Priority Area in the City of Los Angeles. The subject site is also located within an Urban Agriculture Incentive Zone, Methane Zone, and is located within approximately 2.88 kilometers of the nearest fault zone, the Hollywood Fault.



Figure 4: ZIMAS Zoning Map of the proposed project site.

Streets and Public Transit

North La Brea Avenue, adjoining the property to the east, is a designated Avenue I, dedicated with a 100 foot right-of-way.

West Oakwood Avenue, adjoining the property to the north, is designated as a Local Street - Standard, dedicated with a 60 foot right-of-way.

A public alley adjoins the subject property to the west and is dedicated to a right-of-way width of 20 feet.

The project site is served by the Metro Local 212 and 14 bus lines with bus stops located approximately 600 feet south of the project site at the intersection of West Beverly Boulevard and North La Brea Avenue.

Sustainability

The project will comply with the applicable provisions of the Los Angeles Green Building Code and California Green Building Standards Code and 37 long-term and six short-term bicycle parking stalls to encourage alternative modes for transportation.

Landscaping

The project will provide landscaping along the perimeter of the ground floor facing La Brea Avenue and Oakwood Avenue, on the second level courtyard, and on the roof. The planting palette consists of a variety of shrubs, succulents, perennials, and trees. The subject property does not currently contain any trees but proposes six (6) Street Trees along La Brea Avenue and Oakwood Avenue, two (2) trees in the second-floor courtyard, and two (2) trees in the second-floor side yard. These six (6) trees along the public right of way and the four (4) trees located on site will satisfy the 10 required trees for the project containing 40 units. Street trees will be planted in accordance with the Bureau of Street Services, Urban Forestry Division.

Relevant Cases on the Subject Property:

There are no relevant cases on the subject property.

Relevant Cases on Surrounding Properties:

There are no relevant cases were identified to be within a 1,000-foot radius of the project site and filed within the past 10 years.

Density Bonus / Affordable Housing Incentive Program

In accordance with California Government Code Section 65915 and LAMC Section 12.22 A.25, in exchange for setting aside a minimum percentage of the project's units for affordable housing, the project is eligible for a density bonus, reduction in parking, and incentives allowing for relief from development standards. The applicant has requested to utilize the provisions of City and State Density Bonus laws as follows:

Density

The subject property is zoned C2-1VL, which permits residential density at a ratio of one dwelling unit per 400 square feet of lot area. The subject property has a lot area of 10,394 square feet. For purposes of calculating density, one-half the area of the adjacent alley, or approximately 1,000 square feet, is added to the lot area, for a total of 11,394 square feet. As such, the permitted base density on the project site is 29 dwelling units¹. In exchange for reserving a portion of dwelling units for affordable housing, the applicant is entitled to a maximum 35 percent density bonus by-right resulting in a total of 40 dwelling units to be built on site.

Pursuant to the LAMC Section 12.22 A.25 and California Government Code Section 65915, a Housing Development Project that sets aside a certain percentage of units as affordable, either in rental or for-sale units, shall be granted a corresponding density bonus, up to a maximum of 35

percent. **Table 1** below illustrates how the maximum allowable Density Bonus increases for every unit set aside for Very Low Income Households (2.5 percent density increase for every additional one [1] percent of Very Low Income units provided), based on the base density and the chart prescribed in LAMC Section 12.22 A.25.

Table 1: Density Bonus Percentages

Very Low Income Units (Percentage of Base Density)	Maximum Density Bonus Permitted (Based on Base Density)
5 %	20 %
6 %	22.5 %
7 %	25 %
8 %	27.5 %
9 %	30 %
10 %	32.5 %
11%	35%

For the subject property, a 35 percent by-right density bonus would allow for 40 dwellings units (equal to an increase of 11 units beyond the 29 dwelling units of base density) to be constructed on the project site.

In order to obtain the requested 35 percent density bonus, as shown in **Table 1**, the proposed project must set aside at least 11 percent of the base density, equal to five (5) affordable units. The proposed project will provide 5 units for Very Low Income households in exchange for the requested Density Bonus. As such, the Density Bonus request results in a total of 40 units, including 5 affordable units.

Automobile Parking

State Density Bonus law allows for a reduction in the required amount of residential vehicle parking for eligible housing development projects with affordable units. However, Assembly Bill (AB) 2097 (2021-2022) specifies that jurisdictions may not impose any minimum vehicle parking requirements for certain development projects in certain areas, based on proximity to public transit. The project herein qualifies for vehicle parking reductions under AB 2097 and is thus not subject to any minimum vehicle parking requirements; nonetheless, the applicant proposes to voluntarily provide up to 16 vehicle parking spaces.

REQUESTED ENTITLEMENTS

Pursuant to the LAMC Section 12.22 A.25 and Government Code Section 65915, the project is entitled to four (4) Incentives in exchange for reserving at least 16 percent of the base density for affordable households. The proposed project will set aside 5 units, equal to 17 percent of the base number of units, for affordable households. Accordingly, the applicant has requested four (4) Off-Menu Incentives:

- 1. Floor Area Increase (Off-Menu)** – The subject property is zoned C2-1VL, which limits the FAR of the property to 1.5:1. The project proposes a total of 40,506 square feet of floor area, equating to a total floor area ratio (FAR) of 3.91:1. Accordingly, the project is requesting an Off-menu Incentive for an increase in FAR to a maximum of 3.91:1 in lieu of the 1.5:1 FAR otherwise permitted.

2. **Height Increase (Off-Menu)** – The subject property is zoned C2-1VL, with a Height District 1VL limiting the maximum building height to 45 feet and three (3) stories. The project proposes a building height of 75 feet and six (6) stories. Accordingly, the project is requesting an Off-menu Incentive for a total building height of 75 feet measured to the top of the parapet in lieu of the 45 feet otherwise permitted.
3. **Transitional Height (Off-Menu)** – The subject property is zoned C2-1VL but is located diagonally across from a lot zoned R1. The project proposes an overall building height of 75 feet. The project is requesting an Off-menu Incentive to allow a building height of 75 feet for the northwesterly portion that is within 199-feet of the nearest R1 zone.
4. **Side Yard Setback (Off-Menu)** – The subject property is zoned C2-1VL, which limits residential uses to have the setbacks as the R4 zone. A 6-story structure in the R4 zone would be required a side yard of 9 feet. The project is requesting an Off-menu Incentive for a residential side yard setback of 5 feet in lieu of the 9 feet otherwise required.

Housing Replacement

Pursuant to LAMC Section 12.22 A.25, an eligible Housing Development shall be eligible for Density Bonus Incentives if it meets any applicable replacement requirements of California Government Code Section 65915(c)(3) (California State Density Bonus Law).

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). SB 330 creates new state laws regarding the production, preservation and planning for housing, and establishes a statewide housing emergency until January 1, 2015. During the duration of the statewide housing emergency, SB 330, among other things, creates 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 Housing Crisis Act of 2019, as amended by SB 8 (California Government Code Section 66300 et seq.), prohibits the approval of any proposed housing development project on a site that will require demolition of existing dwelling units or occupied or vacant “Protected Units” unless the 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 five years. Additionally, the project must also replace all existing or demolished “Protected Units.” The site is currently operated as a car rental facility with no residential uses in the last 10 years. Pursuant to the Housing Crisis Act of 2019 SB8 No Net Loss Property Owner Declaration, dated June 13, 2024 and signed by the applicant indicated that housing units have existed on site within the past five (5) years. The provisions of SB 8 do not apply to commercial properties; therefore no SB 8 replacement affordable units are required.

As such, the project meets the eligibility requirement for providing replacement housing consistent with California Government Code Sections 65915(c)(3) (State Density Bonus Law) and 66300 (Housing Crisis Act of 2019).

Housing Element Law

Senate Bill (SB) 166 was adopted on September 29, 2017, and amended Government Code Section 65863, the No Net Loss Law, to require sufficient adequate sites to be available at all times through the Housing Element Planning period to meet a jurisdiction's remaining unmet Regional Housing Needs Assessment (RHNA) goals for each income category. Pursuant to this section, as jurisdictions make decisions regarding zoning and land use, or development occurs, jurisdictions must assess their ability to accommodate new housing in each income category on the remaining sites in their Housing Element Site Inventories. A jurisdiction must add additional sites to its inventory if land use decisions or development results in a shortfall of sufficient sites to accommodate its remaining housing need for each income category. In particular, a jurisdiction may be required to identify additional sites if a jurisdiction rezones a site or approves a project at a different income level or lower density than showing in the site's inventory.

The project is located on a site comprised of two (2) lots that are identified in the Inventory of Sites prepared for the 2021-2029 Housing Element. As a whole, the site would require 0.36 units for Lower Income households. The Proposed Project includes 40 units, including 5 units restricted to Very Low Income households. Therefore, the proposed project would not result in any fewer units than those identified in the Housing Element, and the specific findings in Government Code Section 65863(b)(1) are not required.

PUBLIC HEARING

An initial public hearing with the Hearing Officer was held virtually via Zoom on Thursday, January 23, 2025. Comments from the public hearing are documented in Public Hearing and Communications, Page P-1. The hearing was attended by representatives of the applicant, Los Angeles City Planning staff, and approximately three (3) individuals. No representatives from Council District 5 and from the Mid City West Neighborhood Council attended the public hearing.

ISSUES AND CONSIDERATIONS

The following includes a discussion of issues and considerations related to the project. These topics were either identified during the project review process by the Department of City Planning, at the public hearing held on January 23, 2025, or in discussions with the applicant.

Operational and Environmental Impacts

During the public hearing, two members of the public raised several concerns regarding potential impacts on the community. Specifically, commenters stated that the proposed amount of vehicle parking is inadequate and cited the existing high demand for street parking in the residential neighborhood to the west along Detroit Street. Many nearby residents also submitted written correspondence expressing similar parking concerns. The area around the project is located within the LADOT Preferential Parking District 47 which requires parking permits that are required and is subject to review by LADOT. In addition, the project is meeting all vehicle parking requirements pursuant to State Density Bonus Law, the LAMC and AB 2097.

Commenters at the public hearing and the letters of opposition raised additional concerns about height. Privacy is not an impact category that can be evaluated under a project's CEQA analysis. In regard to the heights of surrounding buildings, the abutting property to the north and south along La Brea Avenue are developed with one- to two-story multi-story commercial uses and the properties to the west are developed with a two-story multi-family buildings. Furthermore, the

building was designed no protruding balconies along the west side to preserve privacy for the residential neighbors.

Urban Design Studio

The proposed project was reviewed by the Urban Design Studio (UDS) on October 10, 2024 and feedback was provided to the proposed project representative on October 17, 2024. The following includes a bullet points of the Urban Design Studio feedback for the proposed project:

Pedestrian First:

- Having the entry to the proposed restaurant space open to the corner is a good feature (and one that is a frequent suggestion made at PVP peer review); make the landscape plans consistent
- There is little to distinguish the pedestrian lobby entrance from the retail spaces; consider ways to give it more prominence and how the address number required by LAFD will be integrated
- Terrific that the choice has been made to place the transformer in a vault below ground

360° Design:

- Add complete materials call-out/keynotes to elevations and provide more detail such as of the stucco finishes and any proposed roll-up doors or grilles, as at parking entry and trash room; please refer to City instructions for the preparation of building elevations
- The detail at the street-facing elevation of stair #1 and elevator #1 suggests a screen pierced in the wall of these façades but this must be a surface pattern(?); clarify how this is to be realized

Climate-Adapted:

- Extensive roof deck area may preclude the solar PV installation required to comply with 2022 California Energy Code, if no LADBS permit application was submitted pre-2023
- Use the largest possible tree wells to install the 8' x 8' *Type 1C* tree wells that could be accommodated in the > 14'-wide sidewalks-- thereby allowing Urban Forestry Division to select a large-canopy street tree species; please see the standard plan updated in 2021 at: S-450-4-1
- Urban Forestry Division might require > 25' spacing between street trees along Oakwood
- The EC Capable/Ready and EVCS tabulated in the project summary differs (and with a lower total number) from the spaces indicated on the first floor plan; reconcile these quantities

Other Code-Related Comments:

- The 5'-wide setback at the side yard with the adjacent property is fine from a DB/Planning Code perspective (7' minimum is required by Chapter 12 of the CBC, Interior Environment)

but < 10' will only allow for 25% openings, per floor, on south elevation; see: [CBC Table 705.8](#)

- LADWP prohibits openings within 10' of transformers and, even more problematic, stair #2's egress pathway passes through this required setback; see [Transformer Pad Requirements](#)
- While it's perfectly OK for balconies to project over the public r-o-w (with a R-Permit), once an amenity has been provided it must be made accessible, i.e. requiring the 5' turning radius

The applicant responded to the Urban Design Studio feedback and resolved the issues by revising the plans to ensure consistency among documents, to add additional clarifying notations, and to address trees and parking. Additionally, the responses included provided explanations for the items that did not change, such as the solar photovoltaic installation and balconies.

CONCLUSION

Based on the public hearing and information submitted to the record, staff recommends that the City Planning Commission find, based on its independent judgment, after consideration of the entire administrative record, find that the project is categorically exempt from CEQA. Planning Staff also recommends that the City Planning Commission approve the Density Bonus project, with the requested Off-Menu Incentives.

CONDITIONS OF APPROVAL

Pursuant to Sections 12.22 A.25 of the Los Angeles Municipal Code, the following conditions are hereby imposed upon the use of the subject property:

A. Development Conditions

Density Bonus

1. **Site Development.** Except as modified herein, the project shall be in substantial conformance with the plans, submitted by the Applicant, stamped "Exhibit A," and attached to the subject case file. No change to the plans shall be made without prior review by the Department of City Planning, Central Project Planning Division, and written approval by the Director of Planning. Each change shall be identified and justified in writing. Minor deviations may be allowed in order to comply with the provisions of the LAMC or the project condition.
2. **Use.** Authorized herein is a six-story mixed-use residential and commercial building consisting of 40 dwelling units and 2,143 square-feet of commercial uses.
3. **Residential Density.** The project shall be limited to a maximum density of 40 dwelling units.
4. **On-Site Restricted Affordable Units.** A minimum of 5 units, that is at least 16 percent of the base dwelling units permitted in the C2-1VL Zone, shall be reserved as Very Low Income Households, as defined by the State Density Bonus Law per Government Code Section 65915(c)(1).
5. **Changes in On-Site Restricted Units.** Deviations that increase the number of restricted affordable units or that change the composition of units or change parking numbers shall be consistent with LAMC Section 12.22 A.25 and State Density Bonus Law (Government Code Section 65915).
6. **Housing Requirements.** Prior to issuance of a building permit, the owner shall execute a covenant to the satisfaction of the Los Angeles Housing Department (LAHD) to make at least 16 percent of the site's base density units (5 units) available to Very Low Income Households, for sale or rental as determined to be affordable to such Households by LAHD for a period of 55 years. Enforcement of the terms of said covenant shall be the responsibility of LAHD. The applicant shall 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.

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

7. **Housing Replacement.** Prior to issuance of a building permit, the owner shall execute a covenant to the satisfaction of the Los Angeles Housing Department (LAHD). Enforcement of the terms of said covenant shall be the responsibility of LAHD. The applicant shall 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 for more information.

On-site Restricted Affordable Units may be used to satisfy the Housing Replacement units required pursuant to SB 8 provided such units meet the income levels, to the satisfaction of LAHD.

8. Incentives.

- a. **Floor Area Ratio (FAR).** The project shall be permitted a maximum floor area of 3.91:1 in lieu of the otherwise permitted FAR of 1.5:1.
- b. **Height.** The project shall be permitted a maximum building height of 75 feet and six (6) stories as measured to the top of the parapet.
- c. **Transitional Height.** The project shall be permitted a maximum building height of 75 feet within the northwesterly portion that is within 199-feet of the nearest R1 zone.
- d. **Side Yard.** The project shall be permitted a 5-foot southerly side yard setback for the residential portion of the project in lieu of the otherwise required 9-feet for a six-story building.

9. Parking.

- a. **Parking Per AB 2097.** Automobile parking shall be provided consistent with the LAMC and/or Assembly Bill (AB) 2097. The project is providing 16 vehicle parking spaces.
- b. **Adjustment of Parking.** In the event that the number of Restricted Affordable Units should increase, or the composition of such units should change (i.e., the number of bedrooms, or the number of units made available to Senior Citizens and/or Disabled Persons), or the applicant selects another Parking Option (including Bicycle Parking Ordinance) and no other Condition of Approval or incentive is affected, then no modification of this determination shall be necessary, and the number of parking spaces shall be re-calculated by the Department of Building and Safety based upon the ratios set forth above.
- c. **Bicycle Parking.** Bicycle parking shall be provided consistent with LAMC Section 12.21 A.16.

10. Street Trees.

Street trees shall be provided to the satisfaction of the Urban Forestry Division. Street trees may be used to satisfy on-site tree requirements pursuant to LAMC Article Section 12.21 G.3 (Chapter 1, Open Space Requirement for Six or More Residential Units). Per Exhibit A and 12.21.G.3, a total of six (6) street trees shall be provided or maintained to the satisfaction of the Urban Forestry Division.

11. Required Trees per 12.21 G.2.

As conditioned herein, a final submitted landscape plan shall be reviewed to be in substantial conformance with Exhibit "A." There shall be a minimum of 10 24-inch box, or larger, trees on site pursuant to LAMC Section 12.21 G.2. Any required trees pursuant to LAMC Section 12.21 G.2 shown in the public right-of-way

in Exhibit "A" shall be preliminarily reviewed and approved by the Urban Forestry Division prior to building permit issuance. In-lieu fees pursuant to LAMC Section 62.177 shall be paid if placement of required trees in the public right-of-way is proven to be infeasible due to City determined physical constraints.

12. Landscaping.

- a. All open areas not used for buildings, driveways, parking areas, or walkways shall be attractively landscaped and maintained in accordance with a landscape plan and an automatic irrigation plan, prepared by a licensed Landscape Architect and to the satisfaction of the Department of City Planning.
- b. All planters containing trees shall have a minimum depth of 48 inches.
- c. Planting of required trees within the public right-of-way shall obtain approval from the Urban Forestry Division prior to obtaining clearance from the Department of City Planning. In the event that a required tree cannot be planted within the public right-of-way, those trees shall be planted on-site.

13. Sustainability.

- a. **Solar Energy Infrastructure.** The project shall comply with the Los Angeles Municipal Green Building Code, Section 99.04.211 and 99.05.211, to the satisfaction of the Department of Building and Safety.
- b. **Electric Vehicle Parking.** 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 Article 9, Chapter IX of the LAMC.

14. Circulation. The applicant shall submit a parking and driveway plan to the Los Angeles Department of Transportation (LADOT) for approval.

15. Mechanical Equipment. All mechanical equipment on the roof shall be screened from view by any abutting properties. The transformer, if located in any street-facing yard, shall be screened with landscaping consistent with LADWP access requirements.

16. 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.

17. Graffiti. All graffiti on the site shall be removed or painted over to match the color of the surface to which it is applied within 24 hours of its occurrence.

18. 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.

B. Administrative Conditions

19. Final Plans. Prior to the issuance of any building permits for the project by the Department of Building and Safety, the applicant shall submit all final construction plans that are

awaiting issuance of a building permit by the Department of Building and Safety for final review and approval by the Department of City Planning. All plans that are awaiting issuance of a building permit by the Department of Building and Safety shall be stamped by Department of City Planning staff "Final Plans". A copy of the Final Plans, supplied by the applicant, shall be retained in the subject case file.

- 20. Notations on Plans.** Plans submitted to the Department of Building and Safety, for the purpose of processing a building permit application shall include all of the Conditions of Approval attached herein as a cover sheet and shall include any modifications or notations required herein.
- 21. Building Plans.** A copy of the first page of this grant and all Conditions and/or any subsequent appeal of this grant and its resultant Conditions and/or letters of clarification shall be printed on the building plans submitted to the Development Services Center and the Department of Building and Safety for purposes of having a building permit issued.
- 22. Corrective Conditions.** The authorized use shall be conducted at all times with due regard for the character of the surrounding district, and the right is reserved to the City Planning Commission, or the Director pursuant to Section 12.27.1 of the Municipal Code, to impose additional corrective conditions, if, in the Commission's or Director's opinion, such conditions are proven necessary for the protection of persons in the neighborhood or occupants of adjacent property.
- 23. Approvals, Verification and Submittals.** Copies of any approvals, guarantees or verification of consultations, reviews or approval, plans, etc., as may be required by the subject conditions, shall be provided to the Department of City Planning for placement in the subject file.
- 24. Code Compliance.** All area, height and use regulations of the zone classification of the subject property shall be complied with, except wherein these conditions explicitly allow otherwise.
- 25. Department of Building and Safety.** The granting of this determination by the Director of Planning does not in any way indicate full compliance with applicable provisions of the Los Angeles Municipal Code Chapter IX (Building Code). Any corrections and/or modifications to plans made subsequent to this determination by a Department of Building and Safety Plan Check Engineer that affect any part of the exterior design or appearance of the project as approved by the Director, and which are deemed necessary by the Department of Building and Safety for Building Code compliance, shall require a referral of the revised plans back to the Department of City Planning for additional review and sign-off prior to the issuance of any permit in connection with those plans.
- 26. 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.

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

28. Definition. Any agencies, public officials or legislation referenced in these conditions shall mean those agencies, public offices, legislation or their successors, designees or amendment to any legislation.

29. Enforcement. Compliance with these conditions and the intent of these conditions shall be to the satisfaction of the Department of City Planning and any designated agency, or the agency's successor and in accordance with any stated laws or regulations, or any amendments thereto.

30. Indemnification and Reimbursement of Litigation Costs.

Applicant shall do all of the following:

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

The City shall notify the applicant within a reasonable period of time of its receipt of any

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

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

For purposes of this condition, the following definitions apply:

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

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

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

FINDINGS

Density Bonus/Affordable Housing Incentives Compliance Findings

1. Pursuant to Section 12.22 A.25(g)(2)(i)(c) of the LAMC and Section 65915(e) of the California Government Code, the Director of Planning shall approve a density bonus and requested incentive(s) unless they find that:
 - a. *The Incentive does 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 cost reductions to provide for affordable housing costs per State Law. The California Health & Safety Code Sections 50052.5 and 50053 define formulas for calculating affordable housing costs for Very Low, Low, and Moderate income households. Section 50052.5 addresses owner-occupied housing and Section 50053 addresses rental households. Affordable housing costs are a calculation of residential rent or ownership pricing not to exceed 25 percent gross income based on area median income thresholds dependent on affordability levels.

The proposed project substantially complies with the applicable regulations, standards, and provisions of the State Density Bonus Program. The proposed project includes 16 percent of the project's base density as Very Low Income restricted affordable units, for a total five (5) residential units. No substantial evidence has been entered into the record indicating that any of the requested Off-Menu Incentives do not result in identifiable and actual cost reductions to provide for the project's affordable housing costs (as defined in California Health and Safety Code Sections 50052.5 or 50053) and/or accommodate the restricted Very Low Income unit rents.

In exchange for providing at least 16 percent of the base density for Very Low Income Households, the applicant is entitled to four (4) incentives under both Government Code Section 65915 and the LAMC. The request for FAR increase, height, transitional height, and a side yard reduction qualify as requested Incentives.

Floor Area Ratio

The subject property is zoned C2-1VL. The C2 Zone limits the FAR of the property to 1.5 to 1. Thus, pursuant to LAMC Section 12.22 A.25 the applicant is requesting an Off-Menu incentive to allow a FAR increase from 1.5:1 to 3.91:1 to allow approximately 40,505 square feet of floor area.

The requested increase in FAR will allow for the construction of affordable units in addition to larger-sized dwelling units and retail space at the ground level. Granting of the incentive would result in a building design and construction efficiencies that provide for affordable housing costs; it enables the developer to expand the building envelope so that additional affordable units can be constructed, and the overall space dedicated to residential uses is increased. The increased building envelope also ensures that all dwelling units are of a habitable size while providing a variety of unit types. This Incentive supports the

applicant's decision to set aside a minimum five (5) dwelling units for Very Low Income Households for 55 years.

Height and Story Increase

The subject property is zoned C2-1VL. The 1VL Zone height requirements limit height to 45 feet and three (3) stories. Thus, pursuant to LAMC Section 12.22 A.25, the applicant is requesting an Off-Menu Incentive to allow a maximum height of 75 feet and six (6) stories, in lieu of the otherwise required 45 feet and three stories.

The requested incentive to allow the increase of height and story requirements will allow for the construction of affordable units and retail space within a zone that allows for such uses. Granting of the incentive would result in a building design and construction efficiencies that provide for affordable housing costs; it enables the developer to be able to utilize the sites full potential so that additional affordable units can be constructed, and the overall space dedicated to residential uses is increased through the increased height from 45 maximum feet and three (3) stories to 75 feet and six (6) stories in height. The increased building envelope also ensures that all dwelling units are of a habitable size while providing a variety of unit types. This Incentive supports the applicant's decision to set aside a minimum five (5) dwelling units for Very Low Income Households for 55 years.

Transitional Height

The subject property is zoned C2-1VL and is located diagonally across the street and alley from an R1 zoned lot. LAMC 12.21.1-A,10 includes a table, listed below, indicating the maximum height limits when located within the distances specified from a lot classified in the RW1 Zone or more restrictive zone. Thus, pursuant to LAMC Section 12.22 A.25, the applicant is requesting an Off-Menu Incentive to allow a maximum height of 75 feet in lieu of the otherwise permitted heights listed below.

Table 2: Transitional Height Requirements

Distance	Height
<i>0 to 49 feet</i>	<i>25 feet</i>
<i>50 to 99 feet</i>	<i>33 feet</i>
<i>100 to 199 feet</i>	<i>61 feet</i>

The requested incentive to allow the increase of height allowing for the construction of affordable units within a zone that allows for such uses. Granting of the incentive would result in a building design and construction efficiencies that provide for affordable housing units; it enables the developer to be able to utilize the sites full potential so that additional affordable units can be constructed, and the overall space dedicated to residential uses is increased through the increased height. The increased building envelope also ensures that all dwelling units are of a habitable size while providing a variety of unit types. This Incentive supports the applicant's decision to set aside a minimum five (5) dwelling units for Very Low Income Households for 55 years.

Side Yard

The subject property is zoned C2-1VL. The C2 zone is not required a side yard for commercial uses. However, residential uses are required to provide the same side yard setbacks as required under the R4 Zone. The R4 Zone requires a 5 foot side yard with an

additional foot for each story over the second floor. As such, the project would be required to provide a 9-foot side yard setback at the residential floors. Pursuant to LAMC Section 12.22. A.25, the applicant is requesting an Off-Menu Incentive to allow a 5 foot southerly side yard setback in lieu of the otherwise required 9 feet.

The requested incentive to allow for a reduced side yard setback increases the footprint allowing for the construction of affordable units. Granting of the incentive would result in a building design and construction efficiencies that provide for affordable housing units, enabling the developer to be able to utilize the sites full potential so that additional affordable units can be constructed laterally. The increased building envelope also ensures that all dwelling units are of a habitable size while providing a variety of unit types. This Incentive supports the applicant's decision to set aside a minimum five (5) dwelling units for Very Low Income Households for 55 years.

- b. ***The Incentive(s) 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 and for which there is no feasible method to satisfactorily mitigate or avoid the Specific Adverse Impact without rendering the development unaffordable to Very Low, Low and Moderate Income households. Inconsistency with the zoning ordinance or 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 proposed 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. Accordingly, the proposed project will not have a significant impact on any on-site resource or any resource in the surrounding area. The property is not located on a substandard street in a Hillside area or in a Very High Fire Hazard Severity Zone, so the proposed project will not have a specific adverse impact upon public health and safety or the physical environment. The proposed project is located in a Methane Zone and 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 incentives and waivers of development, 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 Incentive(s) and/or Waivers is/are contrary to State/federal law.**

There is no substantial evidence in the record indicating that the requested Incentives and Waivers of Development are contrary to any State or federal laws.

Environmental Findings

2. **Class 32 CEQA Exemption.** The proposed project qualifies for a Class 32 Categorical Exemption because it conforms to the definition of "In-fill Projects". The project can be

characterized as in-fill development within urban areas for the purpose of qualifying for Class 32 Categorical Exemption as a result of meeting five established conditions and if it is not subject to an Exception that would disqualify it. The Categorical Exception document dated January 21, 2025 and attached to the subject case file provides the full analysis and justification for project conformance with the definition of a Class 32 Categorical Exemption.

3. **Flood Insurance.** 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 outside of a flood zone.

PUBLIC HEARING AND COMMUNICATIONS

A public hearing for Case No. CPC-2024-5977-DB-VHCA was held by the Hearing Officer via Zoom teleconference on January 23, 2025, at 10:00 a.m. The purpose of the hearing was to receive public testimony on behalf of the City Planning Commission as the decision maker on the case.

1. Attendees

The hearing was attended by representatives of the applicant, Los Angeles City Planning staff and approximately three (3) individuals.

No representatives from Council District 5 were in attendance. No representatives from the Mid City West Neighborhood Council attended the public hearing.

2. Applicant Testimony

Mr. Daniel Ahadian, the applicant's representative, presented the proposed project via PowerPoint and discussed the following:

- The existing site location and conditions of the subject property.
- The zoning of the subject property.
- The site's proximity to public transportation.
- Goals of the proposed project: provide housing, affordable housing, increasing pedestrian safety.
- The project's design is Classic French inspired with attention to detail that would blend with the visual characteristics of the neighborhood.
- The structure is tapered, allowing for greater space and distance from the abutting residential neighborhood.
- The third floor and up are further set back from the property line by an additional 14 feet.
- The alley is already 20 feet and would result in a combined 34 feet from the nearest neighboring property line.
- The flat area on the 3rd floor resulting from this step back would not be used as a deck.
- A sense of privacy would be preserved by non-protruding balconies on the west side facing neighbors.
- The roof top open space includes barriers and landscaping such that residents of the project cannot look into the residential neighbors and can only see the tops of buildings two blocks west.
- The project has enhanced pedestrian safety by locating the driveway along the rear alley and away from the street.
- Six trees will be planted in the public right of way.
- The project would create additional housing.
- No displacement would occur as the site does not currently include housing.

3. Public Testimony

Two members of the public spoke during the hearing:

- Yossie Weinberg - had submitted concerns in writing and voiced the following concerns:

- Concerned that the affordable units would not be subject to rent control after a year of construction.
 - Concerned regarding the height of the project. Especially as the project is 75 feet in height but the stairs extend up to 85 feet.
 - Disagreed with the interpretation of how parking is allowed under AB 2097. The project should need a street survey and should consider that all the streets in the neighborhood to the west are in a preferential parking district.
 - Expressed that this would be a dangerous precedent allowing structures in the area.
- Naftali Alt – emailed his opposition to the Project Planner.
 - He agreed and shared similar sentiments to the previous speaker.
 - Expressed concerns about parking.

4. Closing Comments

The Hearing Officer asked the applicant's team to respond. The representative, Mr. Ahadian, responded to some of the concerns regarding parking, height, and ownership. Mr. Ahadian indicated that the project's traffic analysis was reviewed by the Los Angeles Department of Transportation and that State law prohibits cities from requiring additional analysis and impacts that impede housing projects, that a noise study was provided in the case file, that the signatory for the project is authorized to sign the application, that the project is located within an AB2097 area so parking is not a requirement, and that the project is asking for incentives, including height, that have been approved throughout the city.

Staff responded by confirming that height is measured to the top of a project's parapet and that elevator and stair over-runs are permitted an additional 10 feet. Staff also confirmed that the physical case file includes relevant documentation indicating that the signer is permitted to sign the application. Staff clarified that the Los Angeles Housing Department regulates affordability and that covenants will last for 55 years. Lastly, staff confirmed that the Department of Building and Safety has regulatory compliance measures to limit hours and noise during construction.

At the public hearing's closing, the Hearing Officer announced that the case is scheduled to go to the City Planning Commission on April 10, 2025.

5. Additional Communications

Planning staff received seven (7) comment letters from individuals in opposition to the proposed project or expressing concerns. Noted concerns included the number of units, the project height, and amount of automobile parking spaces. Additional concern with noise of construction was also expressed.

Planning staff received one (1) letter of support for the proposed project. Noted points include the production of more housing without the loss of any existing residential units.

The comments made at the public hearings and otherwise received have been addressed in the Issues and Considerations section of the staff report.

Exhibit A

Site Plan, Floor Plans, Elevations, Landscape Plan

Los Angeles, CA 90036

PROJECT TEAM

361 NORTH LA BREA LLC
11627 TELEGRAPH ROAD, SUITE 200
SANTA FE SPRINGS, CA 90670

EDWARD X. CARLSON, ARCHITECT
710 E VERDUGO AVE, #102
BURBANK, CA 91501
EDCARLSON43@MSN.COM

nūr - DEVELOPMENT | CONSULTING
864 S ROBERTSON BLVD, 3RD FLOOR
LOS ANGELES, CA 90035
DANIEL@NURDEVELOPMENT.COM

VIRIDITAS DESIGN
323.377.1018
VIRIDITASDESIGNGROUP@GMAIL.COM

nūr DEVELOPMENT | CONSULTING

PROJECT DESCRIPTION

NEW 6-STORY, 75' HIGH, 40-UNIT, 40,618 SQ FT MIXED-USE BUILDING WITH PARKING PROVIDED ON THE GROUND FLOOR.

BASE/MINISTERIAL INCENTIVES
35% DENSITY BONUS

- 1 - OFF-MENU INCENTIVE TO ALLOW HEIGHT @ 75-FT/6-STORIES.
- 2 - OFF-MENU INCENTIVE TO ALLOW TRANSITIONAL HEIGHT @ 75-FT.
- 3 - OFF-MENU INCENTIVE TO ALLOW FAR @ 3.91:1.
- 4 - OFF-MENU INCENTIVE TO ALLOW SOUTHERLY SIDE YARD AT 5-FT.

ZONING C2-1VL

LOT AREA + 1/2 ALLEY @ 1,000 SQ FT	11,393
DENSITY RATIO FOR C2	1 DU/400 SF
DENSITY ALLOWED PER ZONE (UNROUNDED)	28.48
DENSITY ALLOWED PER ZONE (ROUND DOWN)	28

BASE DENSITY PER DB (ROUND UP)	29
DENSITY BONUS @ 35%	10.15
DENSITY BONUS (ROUND UP)	11
MAX DENSITY PER DB	40

VLI UNITS REQUIRED PER DB 16% x 29 = 4.64	5
AFFORDABLE REQUIRED PER LAHD RUD:	0

TOTAL PROVIDED UNITS	40
MARKET RATE UNITS	36
VLI UNITS PER DB	5

STUDIO (1 HABITABLE ROOM)	0
1-BR (2 HABITABLE ROOMS)	18
2-BR (3 HABITABLE ROOMS)	22
TOTAL	40

BUILDABLE AREA	10,393
ALLOWABLE FAR PER C2	1.5:1
MAX SQUARE FOOTAGE PER C2	15,590

MAX SQUARE FOOTAGE PER OFF-MENU INCENTIVE	40,636
MAX FAR PER OFF-MENU INCENTIVE	3.91:1

RESIDENTIAL FLOOR AREA PROVIDED	38,362
COMMERCIAL (RESTAURANT) FLOOR AREA PROVIDED	2,143
TOTAL FLOOR AREA PROVIDED	40,505

MAX HEIGHT / STORIES PER C2-1VL	45-FEET / 3-STORIES
TRANSITIONAL HEIGHT WITHIN 99' OF R1 ZONE	33-FEET
PROPOSED HEIGHT VIA OFF-MENU INCENTIVE	75-FEET/ 6-STORIES

RESIDENTIAL REQUIRED PER AB 2097	0
COMMERCIAL (RESTAURANT) REQUIRED PER AB 2097	0

TOTAL PARKING PROVIDED	16
RESIDENTIAL REQUIRED PER DB W/O AB 2097 (FOR RECORD ONLY)	
18 @ 1-BR X 1 STALL + 22 @ 2-BR X 1 STALL =	40
COMMERCIAL REQUIRED W/O AB 2097 (FOR RECORD ONLY)	
2,155 @ RESTAURANT / 100 (1 STALL/100 SF OF REST)	22

RESIDENTIAL LONG-TERM REQUIRED: $(25/1) + (15/1.5) = 25 + 15 =$	35
RESIDENTIAL SHORT-TERM REQUIRED: $(25/10) + (15/15) = 2.5 + 1 = 3.5 =$	3
RESIDENTIAL LONG-TERM PROVIDED	35
RESIDENTIAL SHORT-TERM PROVIDED	4

COMMERCIAL (RESTAURANT) LONG-TERM REQUIRED & PROVIDED:	2
COMMERCIAL (RESTAURANT) SHORT-TERM REQUIRED & PROVIDED:	2

OPEN SPACE REQUIRED	
2 HABITABLE ROOMS: 0 X 100	1,800
3 HABITABLE ROOMS: 2 X 125	2,750
4 HABITABLE ROOMS: 12 X 175	-
TOTAL REQUIRED OPEN SPACE PER LAMC	4,550

OPEN SPACE PROVIDED	
ROOF DECK	3,694
2ND FLOOR REC ROOM (MAX 25%)	1,138
TOTAL PROVIDED SQUARE FOOTAGE	4,832

COMMON OPEN SPACE REQUIRED (50% OF REQ'D): 50% x 4,550 =	2,275
COMMON OPEN SPACE PROVIDED:	4,832

MAX REC ROOM: 25% X 4,550 = 1,137

REQUIRED LANDSCAPE: 25% X 3,533 (COMMON OPEN SPACE)	883
PROVIDED LANDSCAPE	928

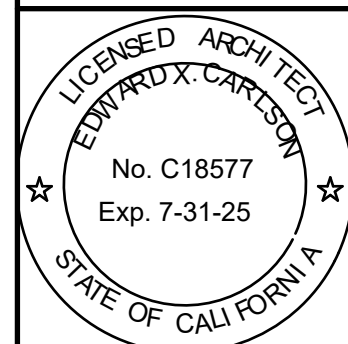
REQUIRED # OF TREES: 40 DU / 4 TREES	10
TREES PROVIDED	10

SETBACK	LOCATION	REQUIRED	PROVIDED
FRONT YARD	LA BREA AVE	0-FEET*	0-FEET
SIDE YARD	OAKWOOD AVE	0-FEET*	0-FEET
SIDE YARD	SOUTHERLY PL	9-FEET	5-FEET**
REAR YARD	ALLEY	0-FEET*	0-FEET

* PER 12.22.A.18.
 ** REQUESTED VIA DB INCENTIVE

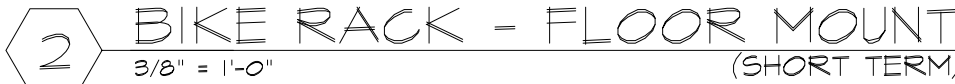
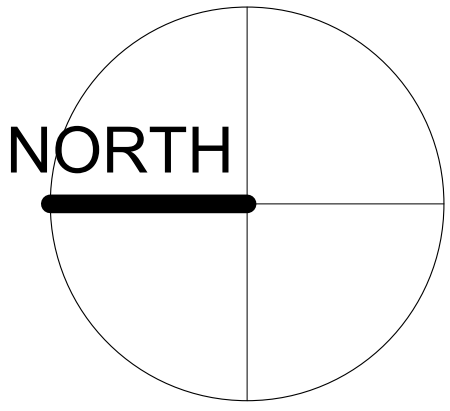
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	AB 2097 ELIGIBILITY
FA 1	FLOOR AREA & OPEN SPACE DIAGRAMS
A1.10	SITE PLAN
A2.10	FIRST FLOOR PLAN
A2.20	SECOND FLOOR PLAN
A2.30	THIRD FLOOR PLAN
A2.40	FOURTH FLOOR PLAN
A2.50	FIFTH FLOOR PLAN
A2.60	PENTHOUSE FLOOR PLAN
A2.70	ROOF PLAN
A3.00	EXTERIOR ELEVATIONS
A3.10	EXTERIOR ELEVATIONS
A4.00	BUILDING SECTIONS

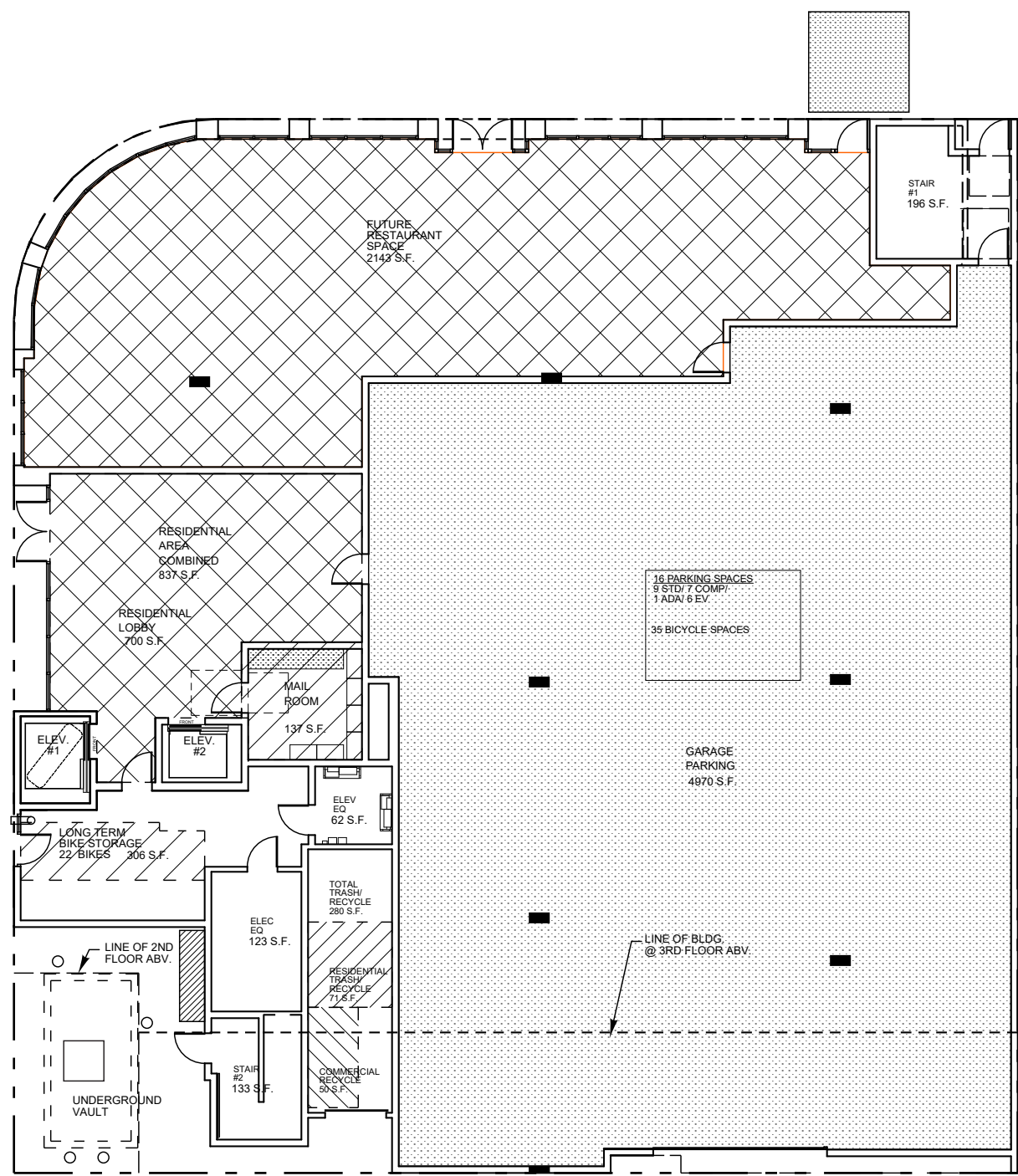
2022 CALIFORNIA BUILDING CODE WITH 2023 L.A.CITY AMENDMENTS
2022 CALIFORNIA MECHANICAL CODE WITH 2023 L.A.CITY AMENDMENTS
2022 CALIFORNIA ELECTRICAL CODE WITH 2023 L.A.CITY AMENDMENTS
2022 CALIFORNIA PLUMBING CODE WITH 2023 L.A.CITY AMENDMENTS
2022 CALIFORNIA GREEN BUILDING STANDARDS W/ 2023 L.A.CITY AMENDMENTS
2022 ACCESSIBILITY GUIDELINES (CAC-TITLE-24) W/ 2023 L.A.CITY AMENDMENTS
2022 CALIFORNIA FIRE CODE WITH 2023 L.A.CITY AMENDMENTS
TABLE 504 ALLOWABLE HEIGHT AND BUILDING AREA
GROUP R-2 APARTMENTS ABOVE PODIUM
TYPE IIIA CONSTRUCTION W/ NFPA 13 SPRINKLERS



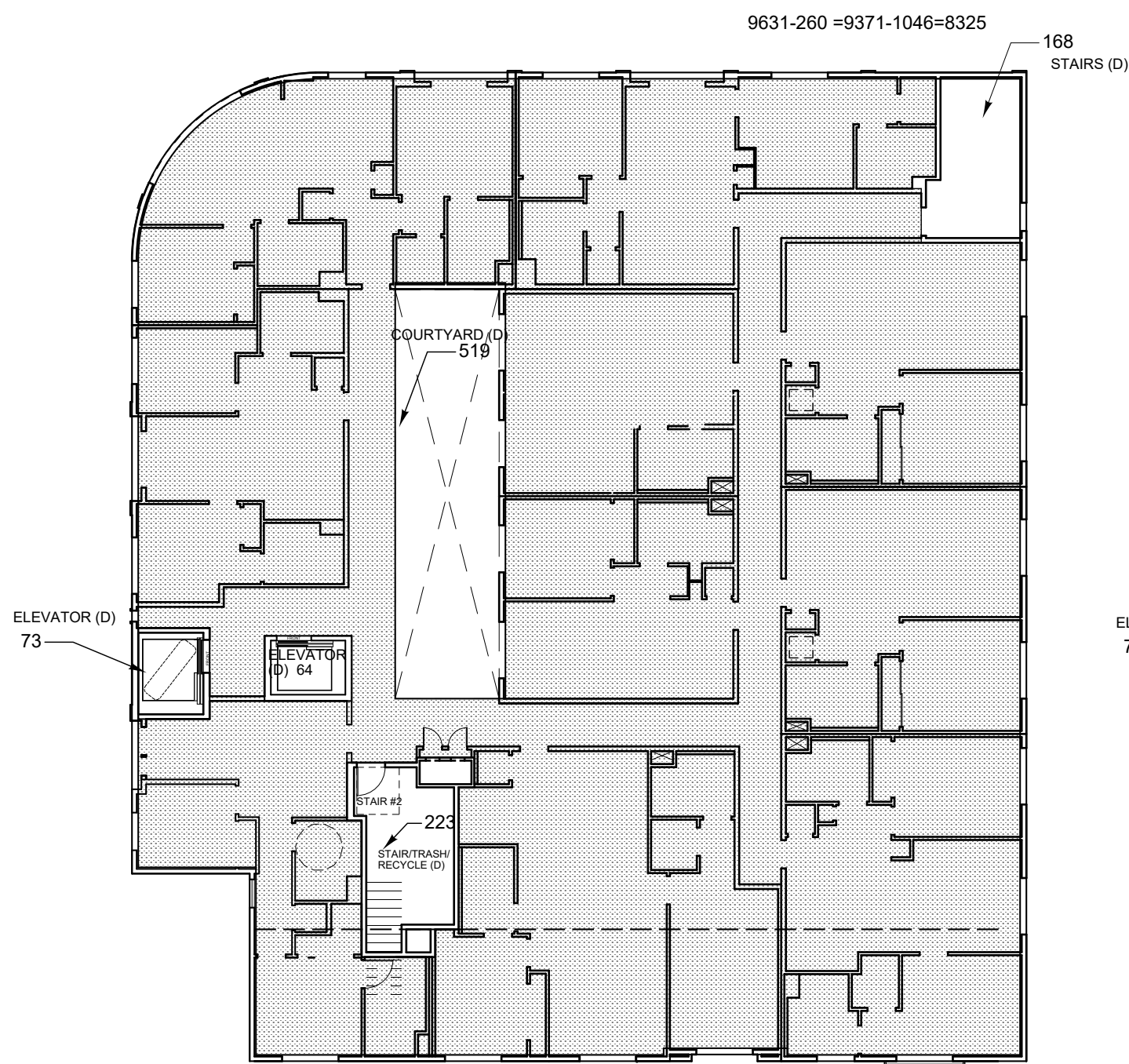
COVER SHEET

ISSUE	DATE
SCALE :	
PROJECT NO. :	
DATE : 06/04/2024	
DRAWN BY :	
SHEET NO :	
A0.00	
OF	SHEETS

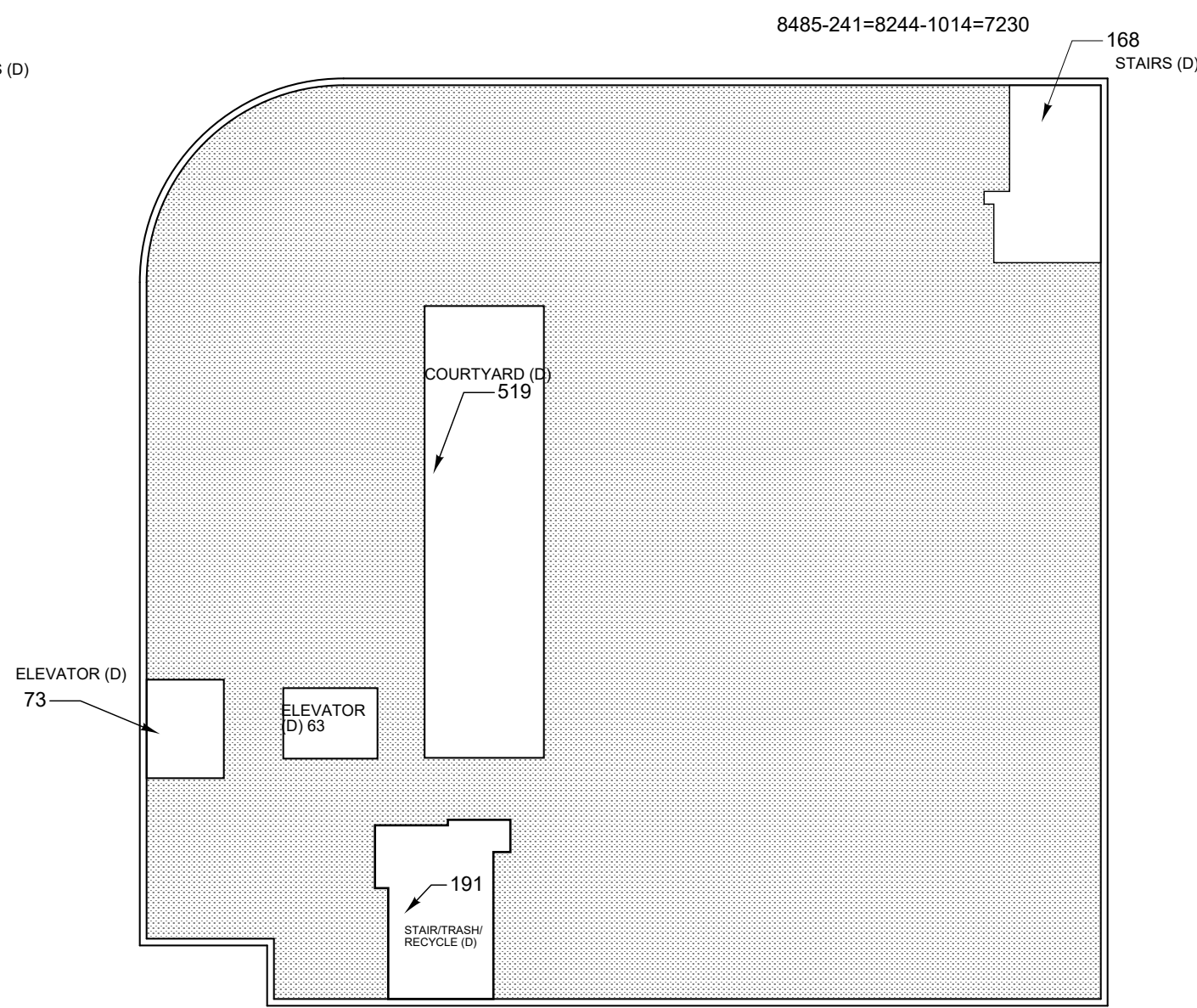




1ST FLOOR / PARKING



2ND FLOOR



3RD - PH (6TH) FLOORS

FLOOR AREA DIAGRAM N.T.S.

	A	B	C	CALCULATE A - (B + C)	CALCULATE A - (B + C)	D	CALCULATE A - (B + C + D)	CALCULATE A - (C + D)
FLOOR LEVEL	GROSS AREA (OUT TO OUT BLDG DIMENSION) SQ FT	AREA OF EXTERIOR WALLS SQ FT	AREA OF VENT SHAFTS & COURT YARD SQ FT	BUILDING CODE AREA - SQ FT TYPE 3A ONLY	BUILDING CODE AREA - SQ FT TYPE 1A ONLY	AREA OF STAIRWAYS, MECHANICAL RMS & BIKE STORAGE SQ FT	ZONING CODE AREA - SQ FT RES. COMM.	SCHOOL CODE AREA - SQ FT
						TYPE 3A TYPE 1A		
1ST FLOOR						329		
LOBBY					TYPE 1A 700 R OCCUPANCY		700	700
PARKING					TYPE 1A 4,970 NOT INCLUDED IN FSR			
ELEVATORS						136		
MAIL ROOM					TYPE 1A 137 R OCCUPANCY		137	137
TRASH					TYPE 1A 280 R OCCUPANCY		280	280
ELECT. EQUIPT.					TYPE 1A	123		
BIKE PARKING/ STORAGE					TYPE 1A	306		
COMMERCIAL SPACE	2,275	132			TYPE 1A 2,143 B OCCUPANCY		2,143	2,275
1ST FLOOR(TYPE 1A)							1,117 2,143	
					8,230		3,260	
2ND FLOOR(TYPE 3A)	TYPE 3A 9,631	260	519	8,809 TYPE 3A		527	8,325	8,548
3RD FLOOR(TYPE 3A)	TYPE 3A 8,485	241	519	7,682 TYPE 3A		495	7,230	7,433
4TH FLOOR(TYPE 3A)	TYPE 3A 8,485	241	519	7,682 TYPE 3A		495	7,230	7,433
5TH FLOOR(TYPE 3A)	TYPE 3A 8,485	241	519	7,682 TYPE 3A		495	7,230	7,433
PH (6TH) FLOOR(TYPE 3A)	TYPE 3A 8,485	241	519	7,682 TYPE 3A		495	7,230	7,433
TOTAL AREA	45,846	1,356	2,595	39,537	8,230	2,507 894	40,505	41,861

EDWARD XAVIER CARLSON
ARCHITECTURE & PLANNING

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LA BREA APARTMENTS
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LOS ANGELES, CALIFORNIA, 90036
361 N LA BREA, LLC
11627 TELEGRAPH ROAD, SUITE 200
SANTA FE SPRINGS, CA 90067 (323)301-9115

LICENSED ARCHITECT
EDWARD X. CARLSON
No. C18577
Exp. 7-31-25
STATE OF CALIFORNIA

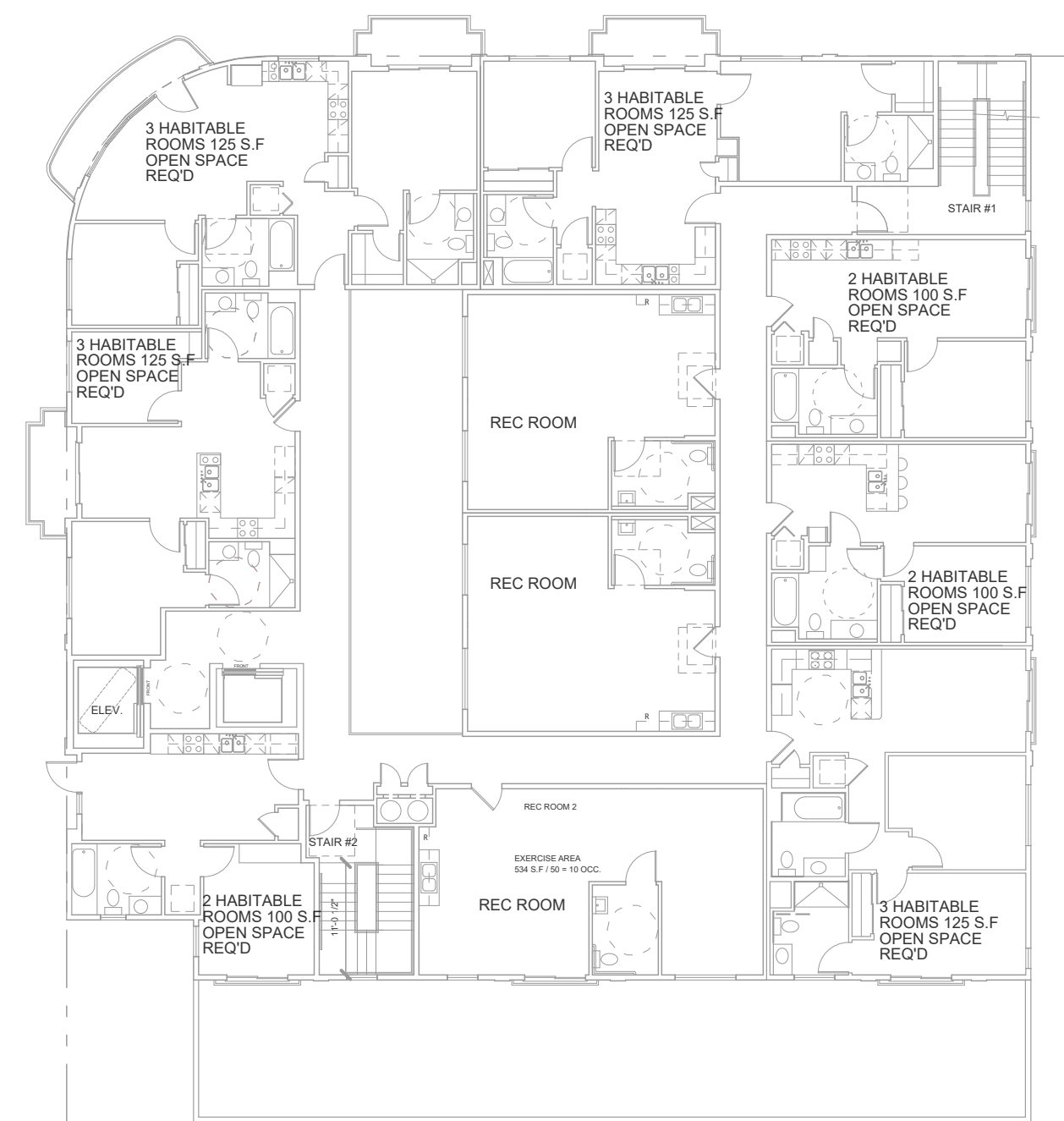
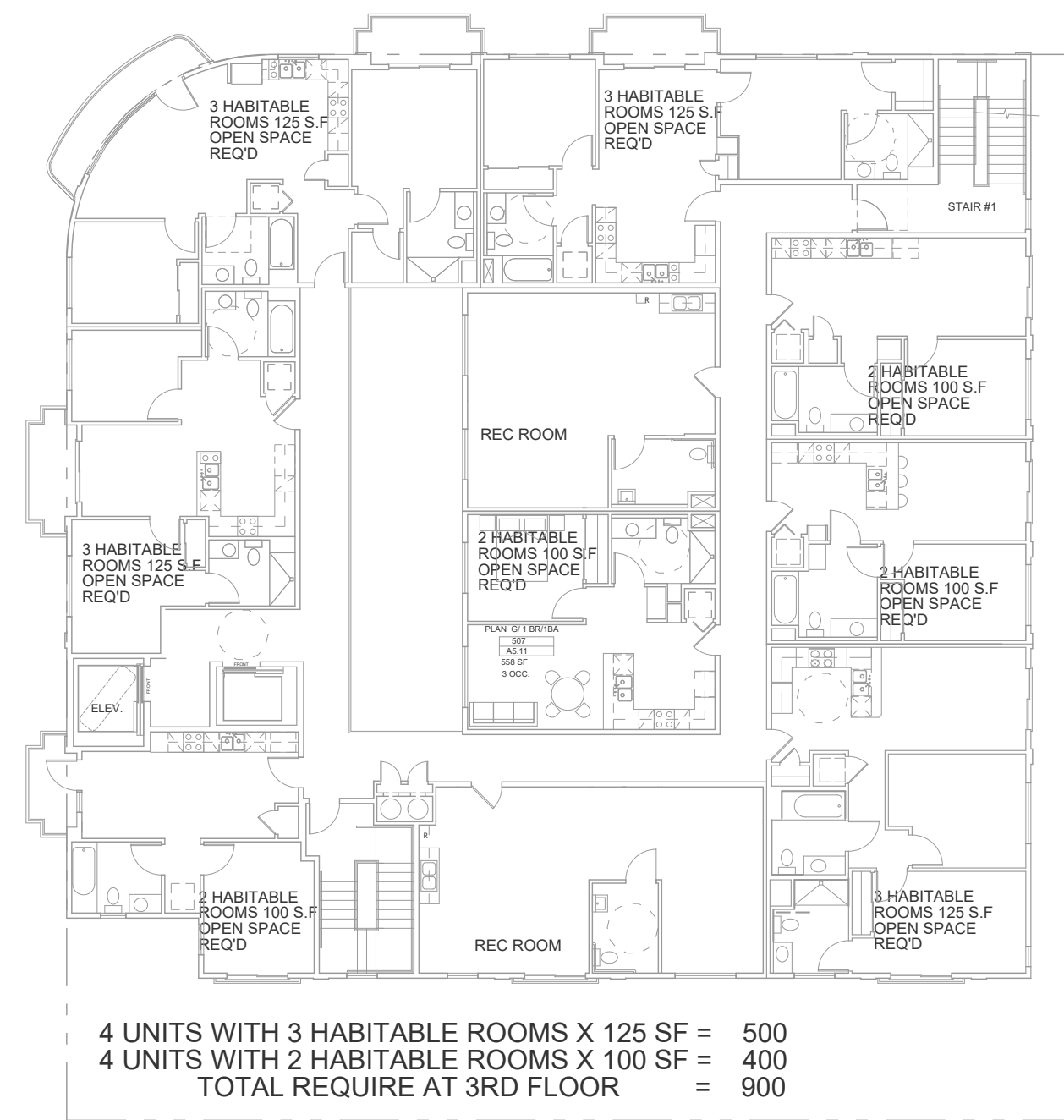
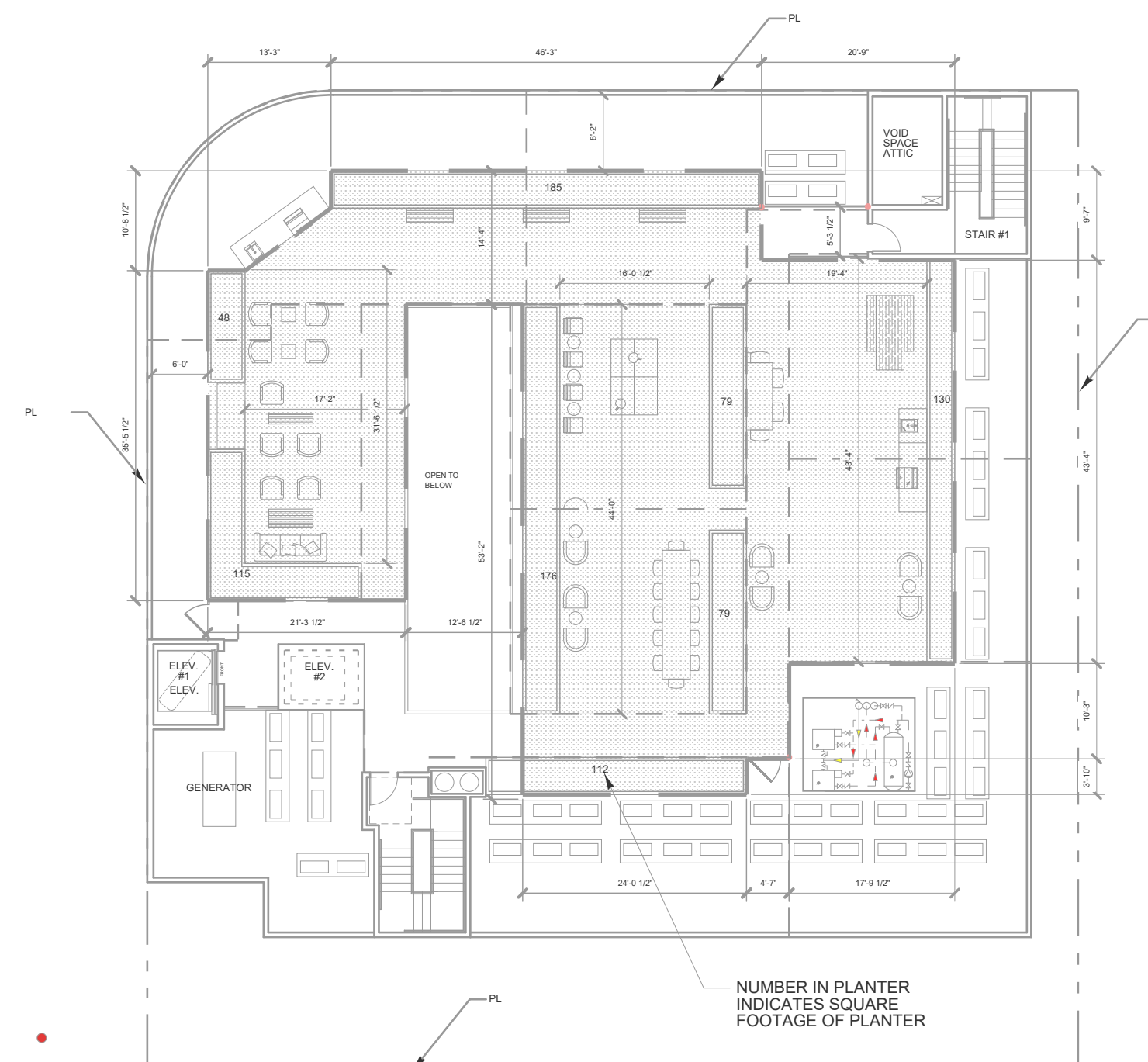
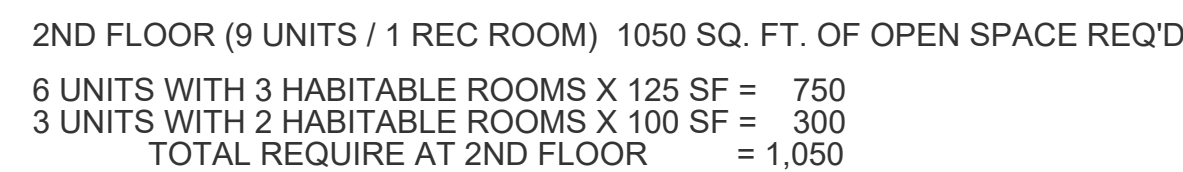
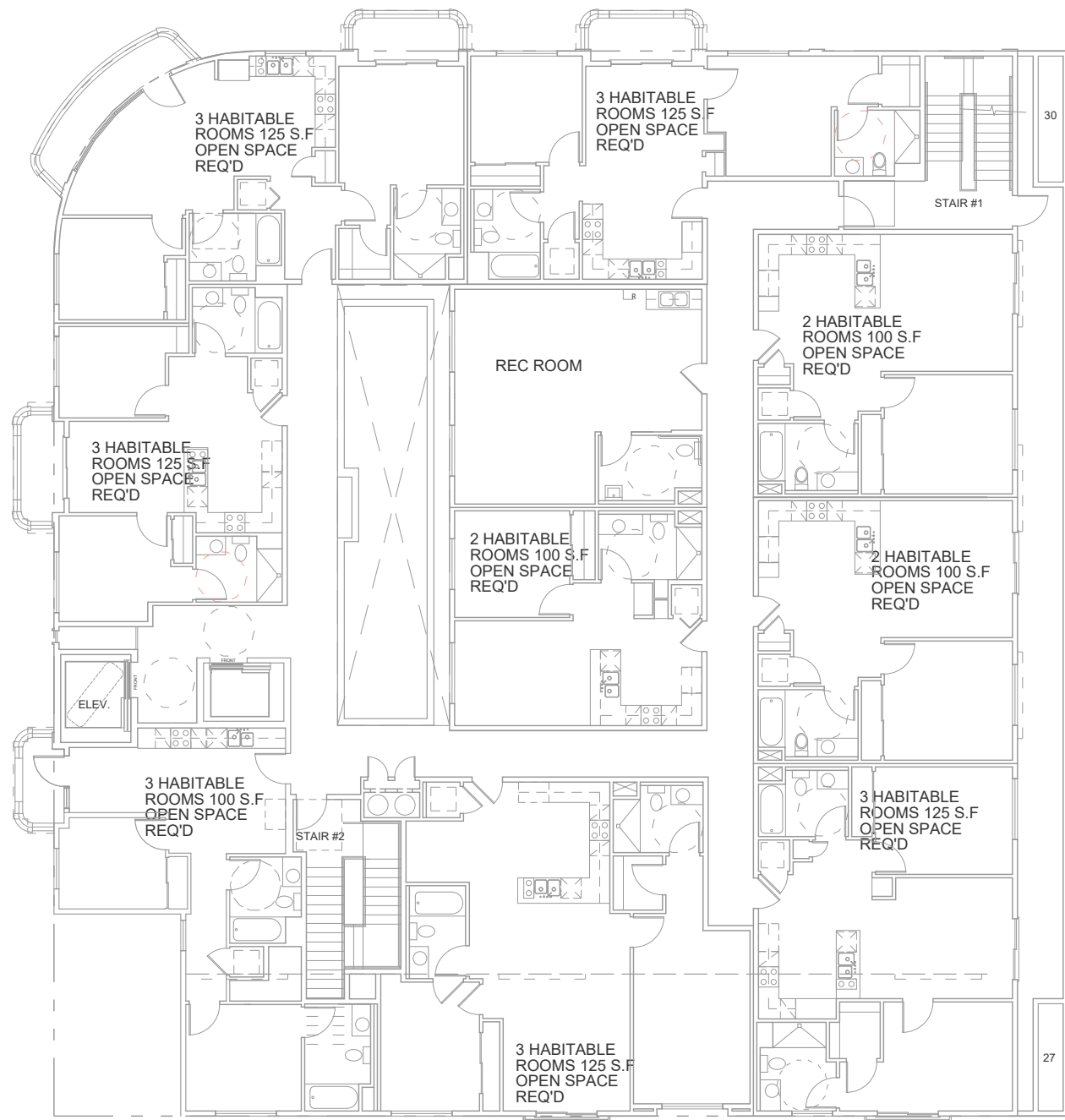
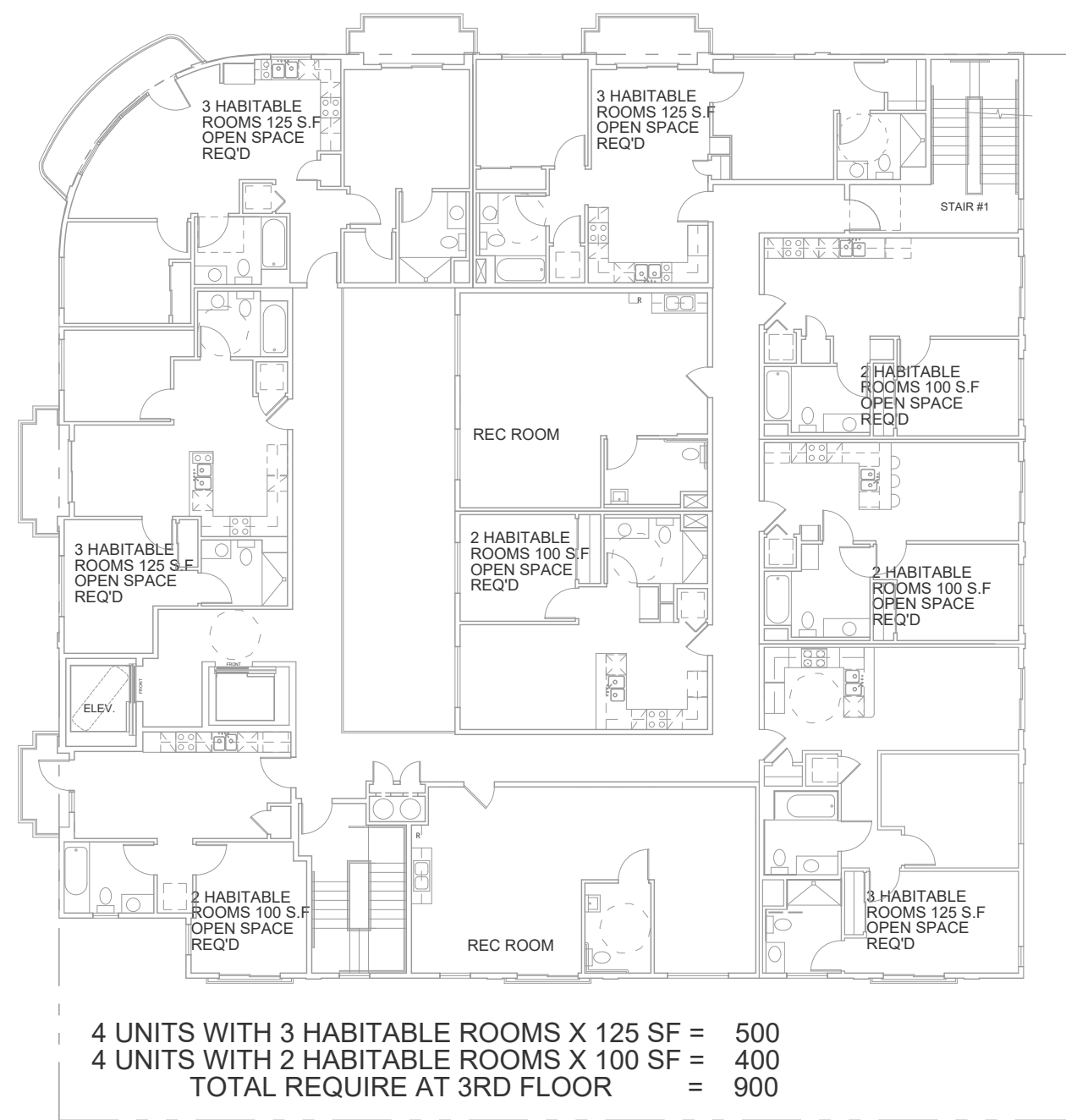
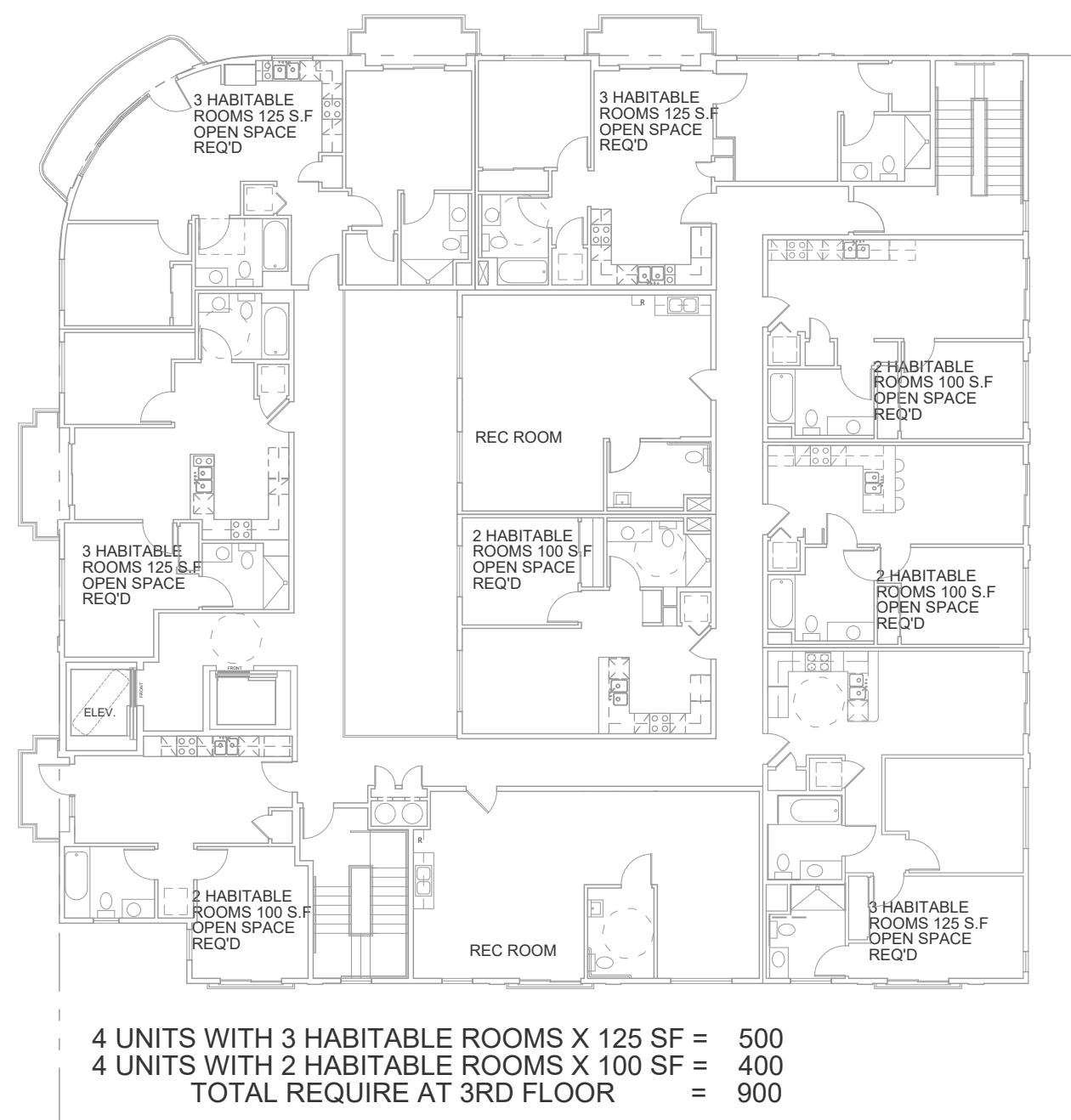
FLOOR AREA DIAGRAM
FOR BUILDING & ZONING

ISSUE DATE

SCALE :
PROJECT NO. :
DATE : 12/20/21
DRAWN BY :
SHEET NO. :

FA 1

OF SHEETS



OPEN SPACE CALCULATION

18 UNITS @ 2 HABITABLE ROOMS @ 100 SF EA = 1800
22 UNITS @ 3 HABITABLE ROOMS @ 125 SF EA = 2750

TOTAL OPEN SPACE REQUIRED = 4550

TOTAL OPEN SPACE PROVIDED	
ROOF DECK	3694 SF
REC ROOMS (MAX. 25%)	1138 SF
TOTAL OPEN SPACE PROVIDED	4832 SF

COMMON OPEN SPACE REQUIRED (50% OF REQUIRED) $50\% \times 4550 = 2275$ SF
COMMON OPEN SPACE PROVIDED = 4832 SF

MAX REC ROOM ALLOWED 25% X 4550 = 1138

LANDSCAPE CALC

LANDSCAPE RQUIRED

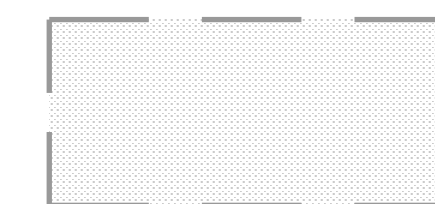
$$3694 \times .25 = 923 \text{ SF}$$

LANDSCAPING PROVIDED

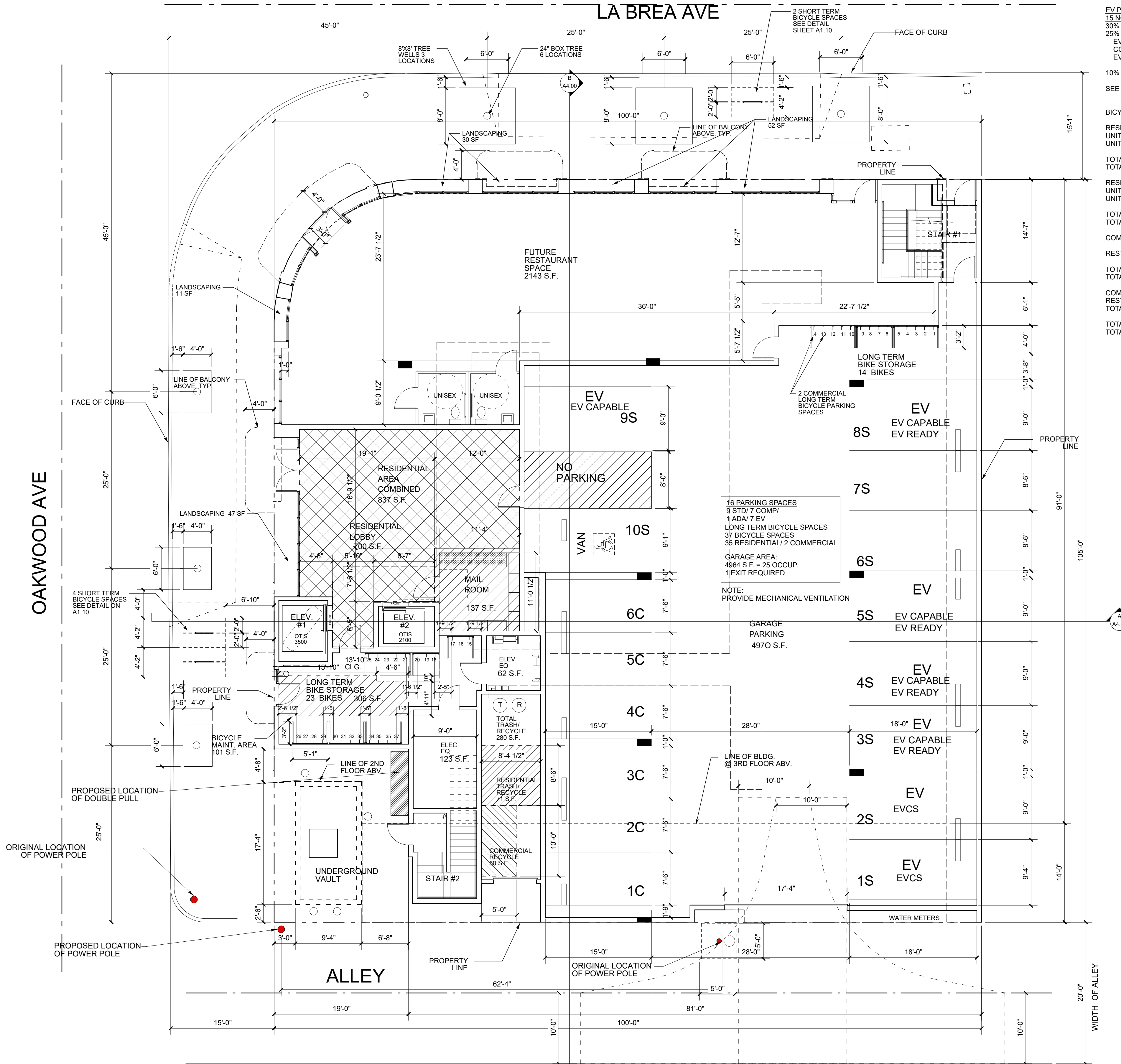
926 = 25%

OPEN SPACE CALCULATION:

SECOND FLOOR	1050 SQUARE FEET REQUIRED
THIRD FLOOR	800 SQUARE FEET REQUIRED
FOURTH FLOOR	900 SQUARE FEET REQUIRED
FIFTH FLOOR	900 SQUARE FEET REQUIRED
PENTHOUSE FLOOR	900 SQUARE FEET REQUIRED
TOTAL OPEN SPACE REQUIRED	4550 SQUARE FEET

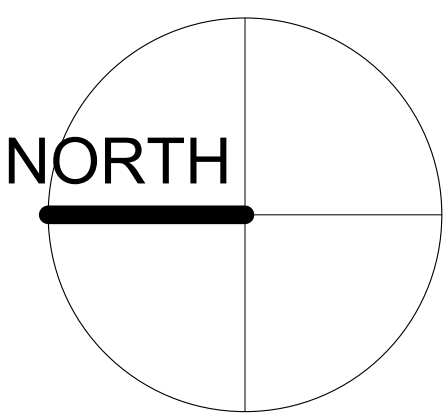


INDICATES OPEN SPACE AT ROOF



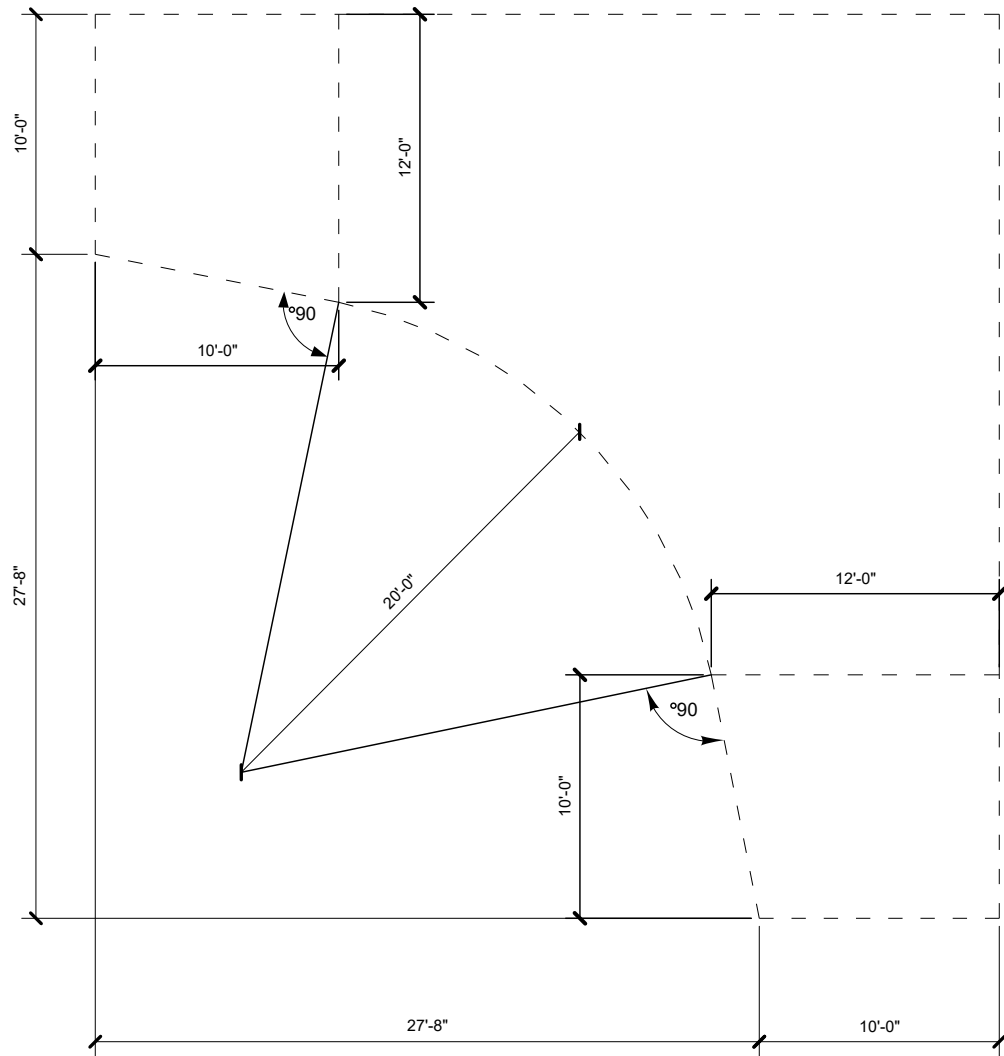
FIRST FLOOR PLAN

SCALE : 1/8" = 1'-0"

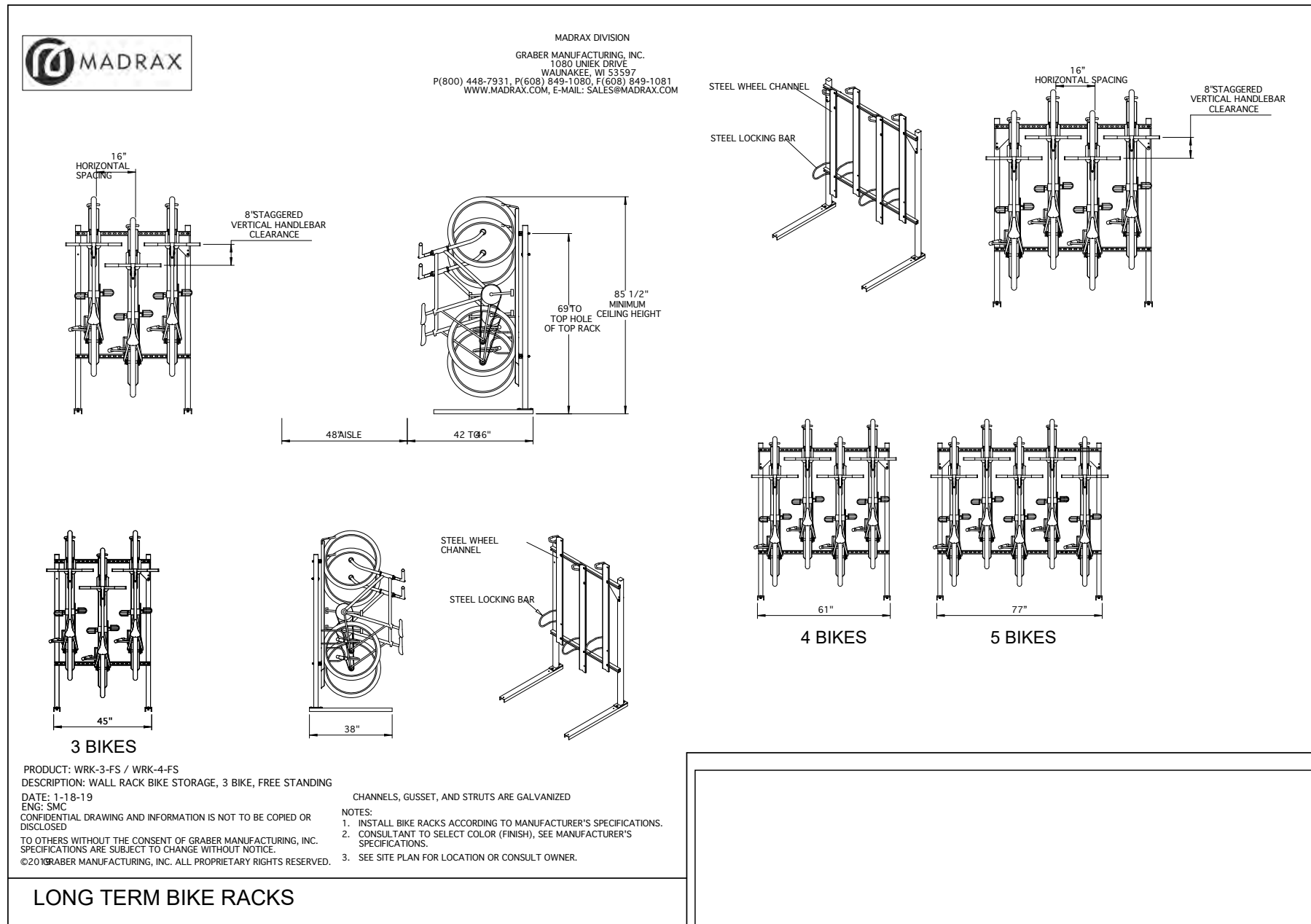


EV PARKING REQUIREMENTS		
15 NON DISABLED PARKING SPACES		
30% OF TOTAL TO BE EV CAPABLE	5 SPACES	
25% OF TOTAL TO BE EV READY	4 SPACES	
EV CAPABLE SPACES CAN ALSO COUNT AS EV READY SO TOTAL OF EV READY AND EV CAPABLE TO BE		
5 SPACES		
10% OF TOTAL TO BE LEVEL 2 EVSE	2 SPACES	
SEE FLOOR PLAN		
BICYCLE PARKING		
RESIDENTIAL LONG TERM		
UNITS 1-25 1 SPACE PER UNIT	= 25 SPACES	
UNITS 26-40 1 SPACE PER 1.5 UNITS	= 10 SPACES	
TOTAL REQUIRED FOR RESIDENTIAL	= 35 SPACES	
TOTAL PROVIDED FOR RESIDENTIAL	= 35 SPACES	
RESIDENTIAL SHORT TERM		
UNITS 1 - 25 1 SPACE PER 10 UNITS	= 2.5 SPACES	
UNITS 26 - 40 1 SPACE PER 15 UNITS	= 1 SPACE	
TOTAL REQUIRED FOR RESIDENTIAL	= 3.5 SPACES = 4 SPACES	
TOTAL SHORT TERM RESIDENTIAL PROVIDED	= 4 SPACES PROVIDE OUT SIDE ON OAKWOOD	

COMMERCIAL LONG TERM		
RESTAURANT 1 SPACE PER 2,000 S.F.	= 2 SPACES	
TOTAL REQUIRED FOR COMMERCIAL	= 2 SPACES	
TOTAL PROVIDED FOR COMMERCIAL	= 2 SPACES	
COMMERCIAL SHORT TERM		
RESTAURANT 1 SPACE PER 2,000 S.F.	= 2 SPACES PROVIDED OUTSIDE ON LA BREA	
TOTAL REQUIRED FOR COMMERCIAL	= 2 SPACES	
TOTAL PROVIDED FOR COMMERCIAL	= 2 SPACES	
TOTAL PROVIDED FOR COMMERCIAL	= 2 SPACES	



TURNING RADIUS FOR CASE I: TWO - WAY TRAFFIC WHERE NO MORE THAN 25 CARS GO AROUND THE TURN



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LICENCED ARCHITECT
EDWARD XAVIER CARLSON
No. C18577
Exp. 7-31-25
STATE OF CALIFORNIA

FIRST FLOOR PLAN

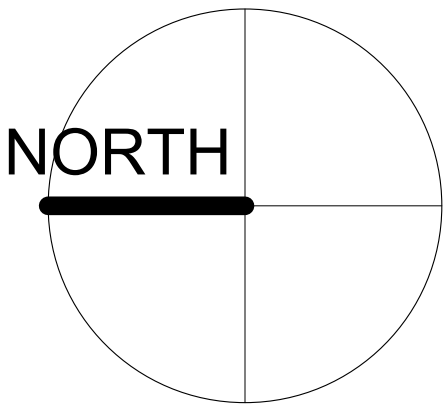
ISSUE DATE

SCALE :
PROJECT NO. :
DATE :
DRAWN BY :
SHEET NO :

A 2.10

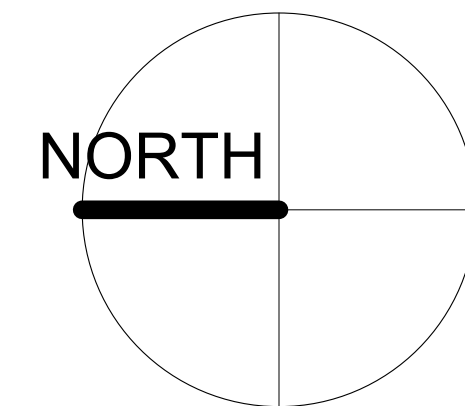
OF SHEETS

303.520.8192
91501
BURBANK, CALIFORNIA

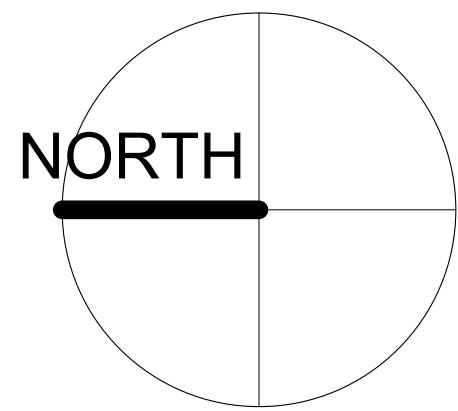


OF SHEETS

OAKWOOD AVE



OAKWOOD AVE



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A 2.40

OF SHEETS

OAKWOOD AVE



SCALE : 1/8" = 1'-0"

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A 2.50

OF SHEETS

OAKWOOD AVE



SCALE : 1/8" = 1'-0'

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SANTA FE SPRINGS, CA 90067 (323)301-9115

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OF SHEETS

OAKWOOD AVE



TOTAL OPEN SPACE REQUIRED = 4550

MAX REC ROOM ALLOWED 25% X 4550 = 1138

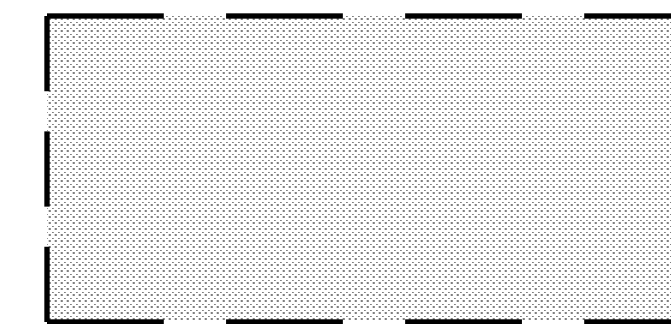
LANDSCAPE CALC

LANDSCAPE RQUIRED

$$3694 \times .25 = 923 \text{ SF}$$

LANDSCAPING PROVIDED

926 = 25%



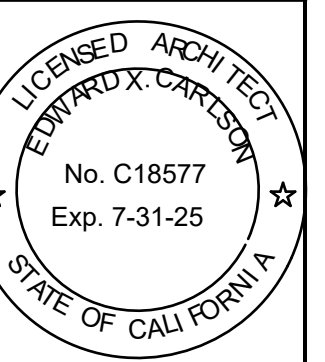
INDICATES OPEN SPACE

ROOF PLAN

SCALE : 1/8" = 1'-0"

EDWARD XAVIER CARLSON
ARCHITECTURE & PLANNING

LA BREA APARTMENTS
361 N LA BREA AVE
LOS ANGELES, CALIFORNIA, 90036
361 N LA BREA, LLC
11627 TELEGRAPH ROAD, SUITE 200
SANTA FE SPRINGS, CA 90067 (323)301-9115

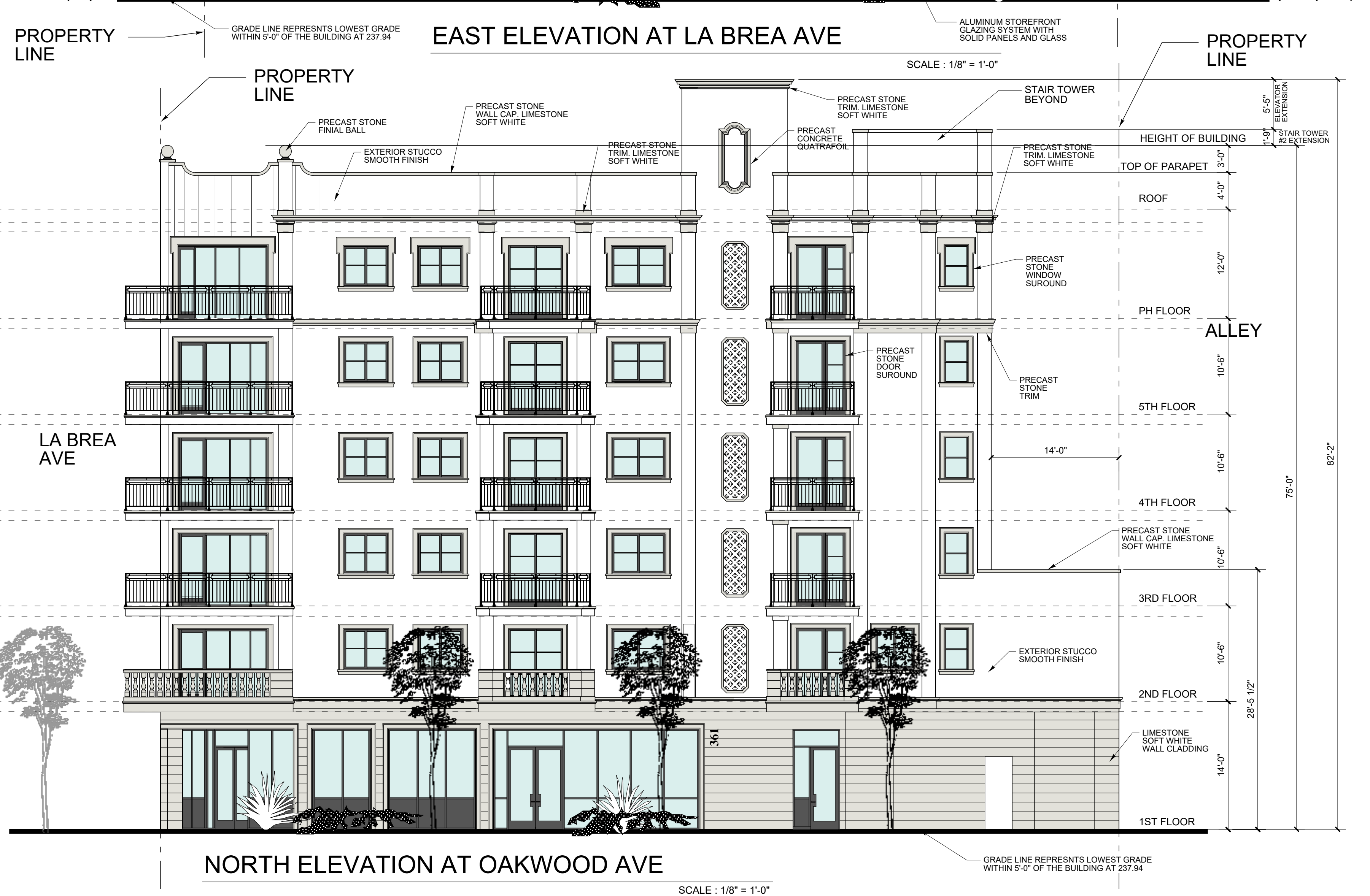


ROOF PLAN

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ROJECT NO. :	
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RAWN BY :	
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F SHEETS



	EXTERIOR ELEVATIONS	<div style="text-align: center;">LA BREA APARTMENTS 361 N LA BREA AVE. LOS ANGELES CALIFORNIA, 90036 361 N LA BREA, LLC 11627 TELEGRAPH ROAD, SUITE 200 SANTA FE SPRINGS, CA 90067 (323)301-9115</div>	EDWARD XAVIER CARLSON ARCHITECTURE & PLANNING	710 E. VERDUGO AVE., BURBANK, CALIFORNIA,	91501 303.520.8192
ISSUE _____ DATE _____					
SCALE :					
PROJECT NO. :					
DATE :					
DRAWN BY :					
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A 3.00	OF _____ SHEETS				



COLORS AND MATERIALS

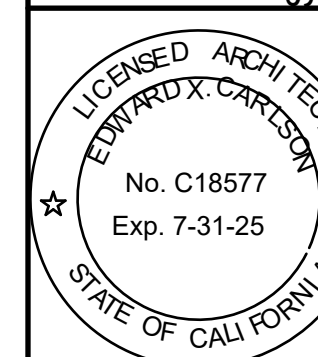
ALL STUCCO FINISHES TO BE SMOOTH

	LA HABRA STCCO DOVE GREY X-40 (66) 66% REFLECTANCE BASE 200
	CLADING AT 1ST FLOOR 12"X24" AND PRECAST TRIM PIECES 1ST FLOOR BALCONIES AND BALLUSTRADES PRECAST INOVATIONS SOFT WHITE LIMESTONE SRI = 84
	CLEAR TEMPERED GLASS
	METAL RAILINGS SHERWIN-WILLIAMS IRON ORE SW 7069
	SLATE ROOFING CHARCOAL GREY SRI 16
	DARK BRONZE ANODIZED WINDOWS, STOREFRONT FRAMES AND PANELS BELOW GLASS AT 1ST FLOOR SRI 19

EDWARD XAVIER CARLSON
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LOS ANGELES, CALIFORNIA, 90036
361 N LA BREA, LLC
11627 TELEGRAPH ROAD, SUITE 200
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EXTERIOR ELEVATIONS

ISSUE	DATE
SCALE :	
PROJECT NO. :	
DATE :	
DRAWN BY :	
SHEET NO :	

SCALE :

PROJECT NO.

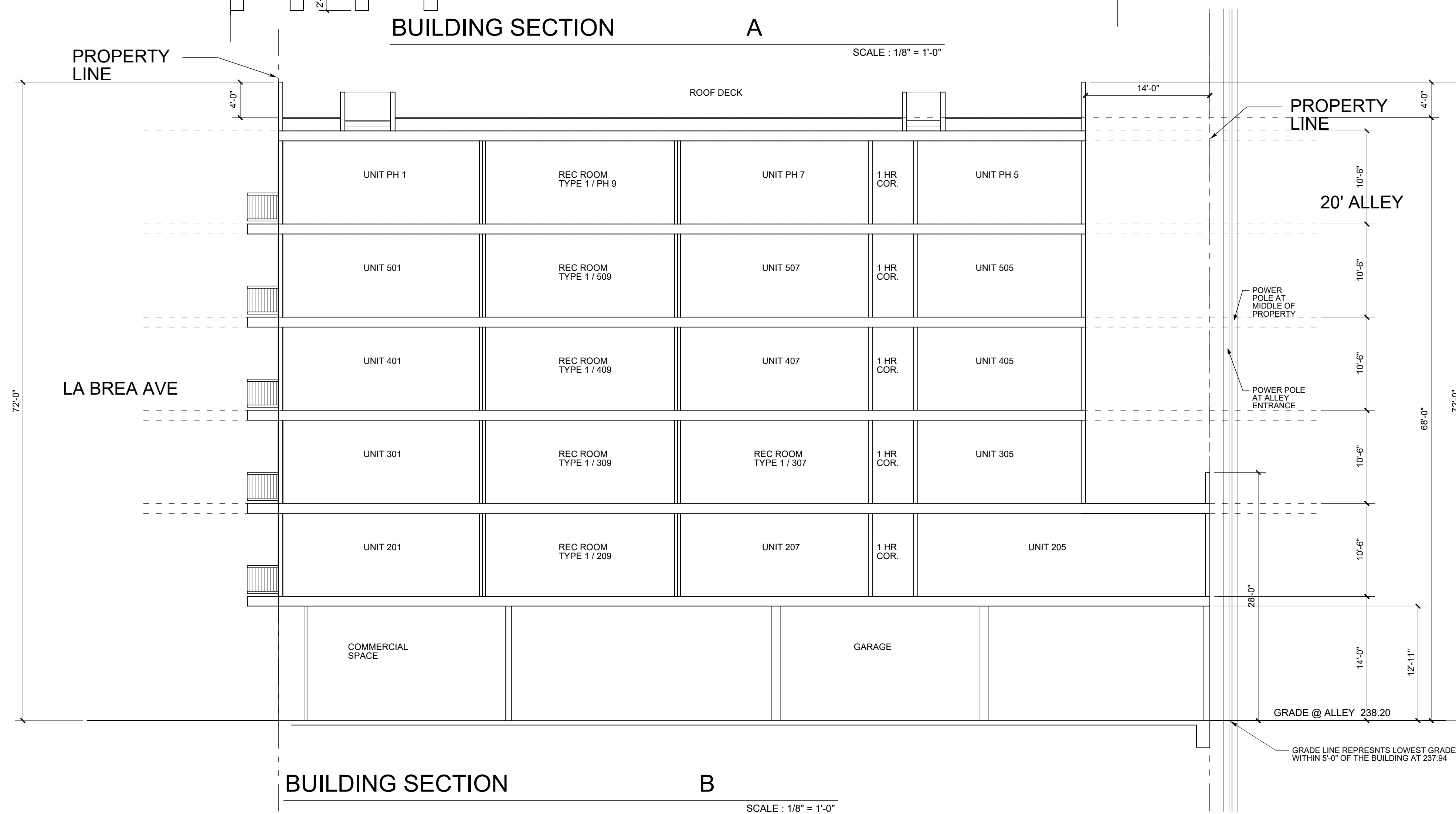
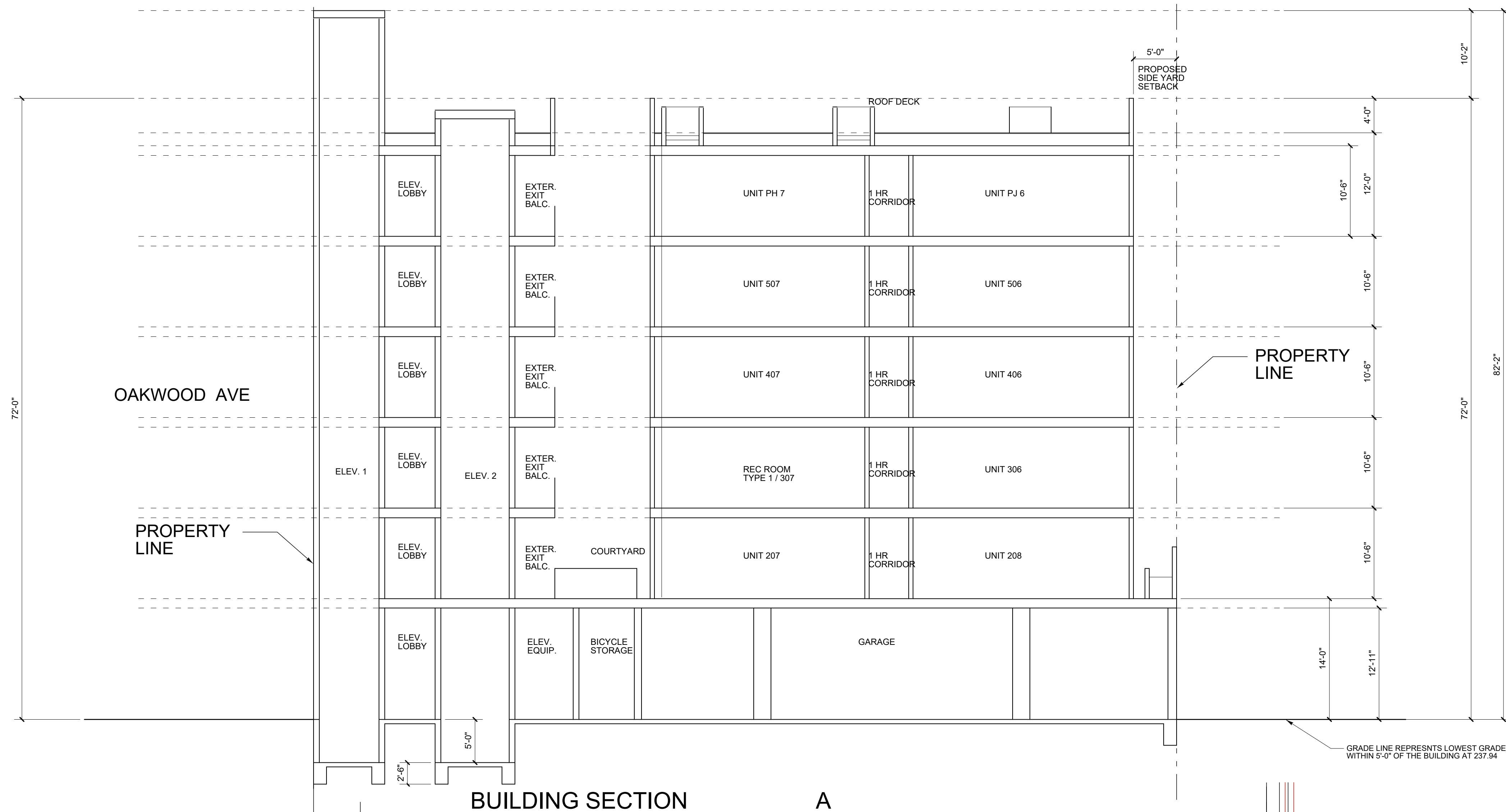
DATE :

DRAWN BY :

SHEET NO :

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OF SHEETS



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ARCHITECTURE & PLANNING

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LA BREA APARTMENTS

361 N LA BREA AVE
LOS ANGELES CALIFORNIA 90036

LOS ANGELES CALIFORNIA, 90038
361 N LA BREA, LLC
1637 TELEGRAPH ROAD SUITE 200

1627 TELEGRAPH ROAD, SUITE 2000
ATA FE SPRINGS, CA 90067 (323)301-

BUILDING SECTIONS

ISSUE	DATE
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CALE :

PROJECT NO. :

DATE :

DRAWN BY :

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








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OF SHEETS



CONCEPTUAL LANDSCAPE PLAN
SCALE: 1/8" = 1'-0"

PLANT LEGEND - GROUND FLOOR

BOTANICAL NAME	COMMON NAME	SIZE AT 5 YRS.	QUANTITY	PLANT TYPE	WUCOLS
 AEONIUM 'KIWI'	KIWI AEONIUM	2' X 18"	3	SUCCULENT	0.3/L
 AEONIUM 'MINT SAUCER'	AEONIUM	2' X 3'	7	SUCCULENT	0.3/L
 AGAVE 'BLUE FLAME'	BLUE FLAME AGAVE	3' X 3'	1	SUCCULENT	0.3/L
 AGAVE LOPHANTHA 'QUADIRCOLOR'	QUADRICOLOR CENTURY PLANT	18" X 18"	3	SUCCULENT	0.3/L
 ARBUTUS 'MARINA' STANDARD FORM	MARINA STRAWBERRY TREE	12' X 10'	3	TREE	0.3/L
 CRASSULA OVATA 'TRICOLOR'	TRICOLOR JADE	2' X 18"	3	SUCCULENT	0.3/L
 DIANELLA REVOLUTA 'LITTLE REV'	LITTLE REV FLAX LILY	2' X 2'	15	GRASS LIKE	0.3/L
 GEIJERA PARVIFLORA	AUSTRALIAN WILLOW	20' X 15'	3	TREE	0.3/L
 GRAPTOVERIA 'FRED IVES'	GRAPTOVERIA	1' X 2'	4	SUCCULENT	0.3/L
 KALANCHOE THYRSIFLORA	FLAPJACKS	1' X 2'	7	GRASS LIKE	0.3/L
 PHORMIUM TENAX 'TOM THUMB'	TOM THUMB FLAX	2' X 2'	6	PERENNIAL	0.3/L
 SEDUM NUSSBAUMERIANUM	COPPERTONE SEDUM	1' X 2'	10	SUCCULENT	0.3/L
 SENECIO MANDRALISCAE	BLUE CHALK STICKS	2' X 2'	4	SUCCULENT	0.3/L

KEY NOTES

1. STREET TREES



2. BICYCLE RACK



2

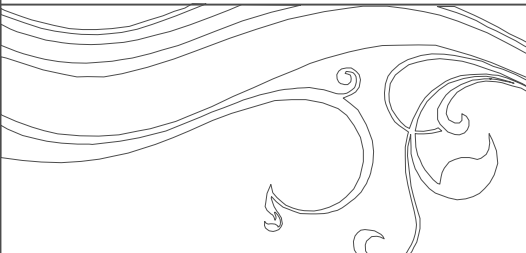
PARKWAY TREE SPACING

ALL PARKWAY TREES SHALL MEET
URBAN FORESTRY AND BOE
SPACING REQUIREMENTS

LANDSCAPE POINT SYSTEM

SQUARE FOOTAGE OF SITE	10,414 S.F.
POINTS REQUIRED:	15
POINTS PROVIDED:	
24" BOX STREET TREES - 6 AT 1 POINT EA.	6
30' ON CENTER MAXIMUM STREET TREES 6 AT 2 POINTS EA.	12
HANDICAP ACCESSIBLE MAIN ENTRANCE	5
TOTAL POINTS PROVIDED:	23


LA BREA APARTMENTS
361 N. LA BREA AVENUE
LOS ANGELES CA 90036




VIRIDITAS
DESIGN
Landscape Architecture

Anne Jones
RLA CA 5999
viriditasdesigngroup@gmail.com
2735 W. Avenue 33
Los Angeles, CA
323.377.1018







A.P.N. 5525-033-001

REVISIONS
1. OCTOBER 28, 2024
2. NOVEMBER 13, 2024

ARCHITECT:
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edcarlson43@msn.com
OWNER:
361 N. LA BREA, LLC
11627 TELEGRAPH RD, SUITE 200
SANTA FE SPRINGS, CA 90067
323.301.9115

DATE:
AUGUST 5, 2024

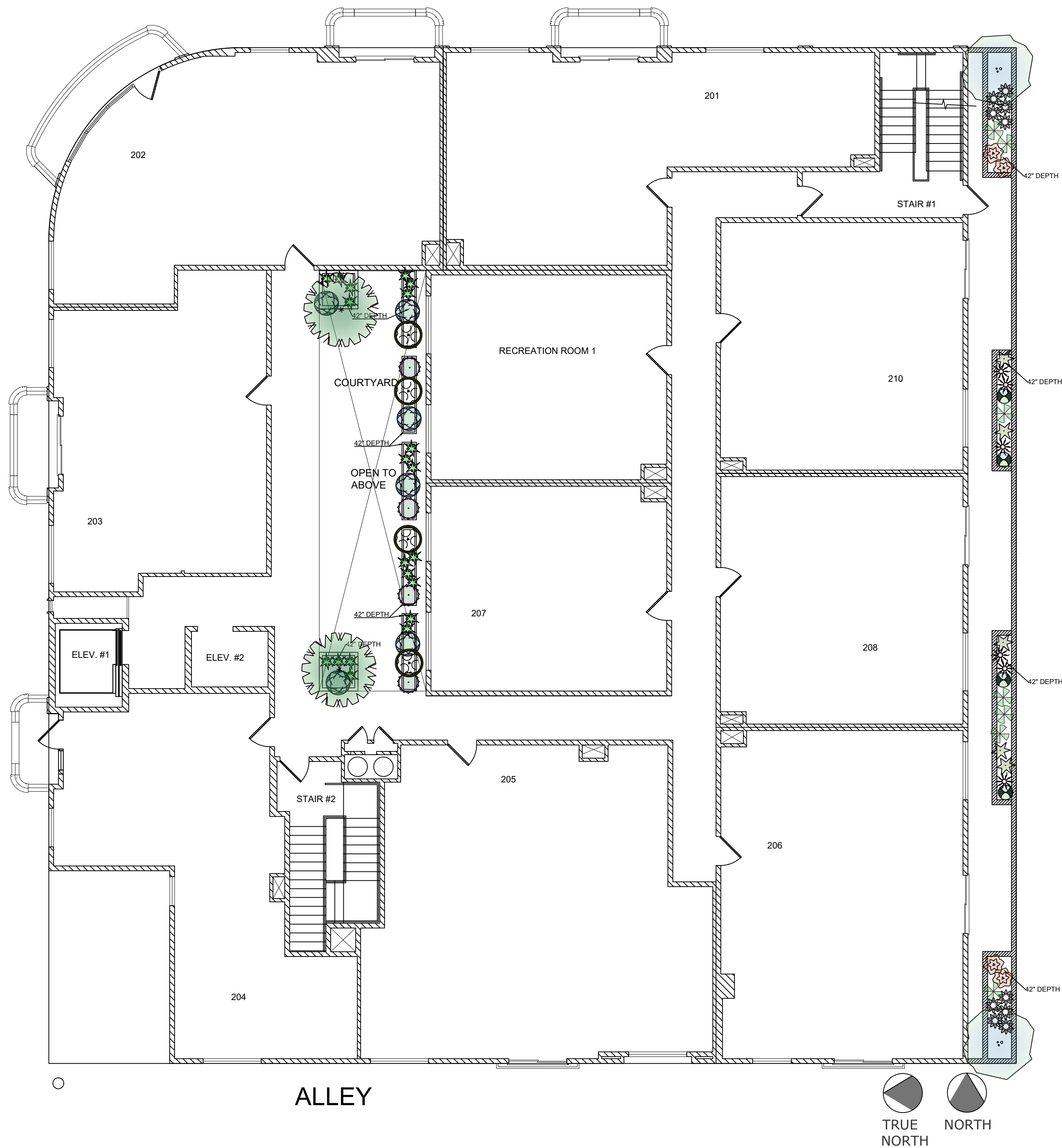
SCALE:
1/8" = 1'-0"

CONCEPTUAL
LANDSCAPE PLAN
GROUND FLOOR







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OAKWOOD AVENUE

LA BREA AVENUE



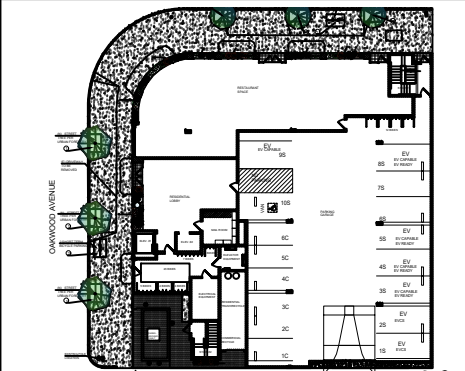

PLANT LEGEND - SECOND FLOOR

BOTANICAL NAME	COMMON NAME	SIZE AT 5 YRS.	QUANTITY	PLANT TYPE	WUCOLS
 AEONIUM 'KIWI'	KIWI AEONIUM	2' X 18"	4	SUCCULENT	0.3/L
 AEONIUM 'MINT SAUCER'	AEONIUM	2' X 3'	7	SUCCULENT	0.3/L
 DIANELLA REVOLUTA 'LITTLE REV'	LITTLE REV FLAX LILY	2' X 2'	6	GRASS LIKE	0.3/L
 FICUS LYRATA	FIDDLE LEAF FIG	7' X 5'	2	TREE	0.6/M
 GRAPTOVERIA 'FRED IVES'	GRAPTOVERIA	1' X 2'	5	SUCCULENT	0.3/L
 KALANCHOE THYRSIFLORA	FLAPJACKS	1' X 2'	4	SUCCULENT	0.3/L
 PELARGONIUM TOMENTOSUM	PEPPERMINT GERANIUM	1' X 3'	4	PERENNIAL	0.3/L
 PHORMIUM TENAX 'TOM THUMB'	TOM THUMB FLAX	2' X 2'	10	PERENNIAL	0.3/L
 PODOCARPUS ELONGATUS 'MONMAL'	ICEE BLUE PODODOCARPUS	12' X 10'	2	TREE	0.6/M
 SANSEVIERIA TRIFASCIATA 'MOONLIGHT'	MOTHER-IN-LAW'S TONGUE	2' X 1'	20	SUCCULENT	0.3/L
 TRADESCANTIA 'GREENLEE'	PALE PUMA SPIDERWORT	6" X 2'	6	PERENNIAL	0.3/L
 ZAMIOCULCAS ZAMIIFOLIA	ZZ PLANT	3' X 2'	4	PERENNIAL	0.6/M

CONCEPTUAL LANDSCAPE PLAN - 2ND FLOOR
SCALE: 1/8" = 1'-0"

LA BREA APARTMENTS
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LOS ANGELES CA 90036

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Landscape Architecture
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RLA CA 5999
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Los Angeles, CA
323.377.1018



A.P.N. 5525-033-001
REVISIONS

NO.	DESCRIPTION	DATE

ARCHITECT:
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edcarlson43@msn.com
OWNER:
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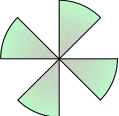
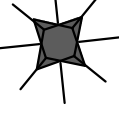

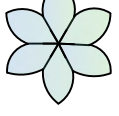
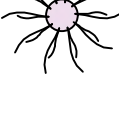

DATE:
AUGUST 5, 2024


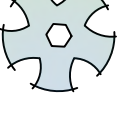
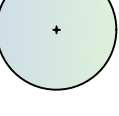
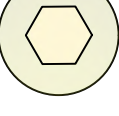
SCALE:
1/8" = 1'-0"

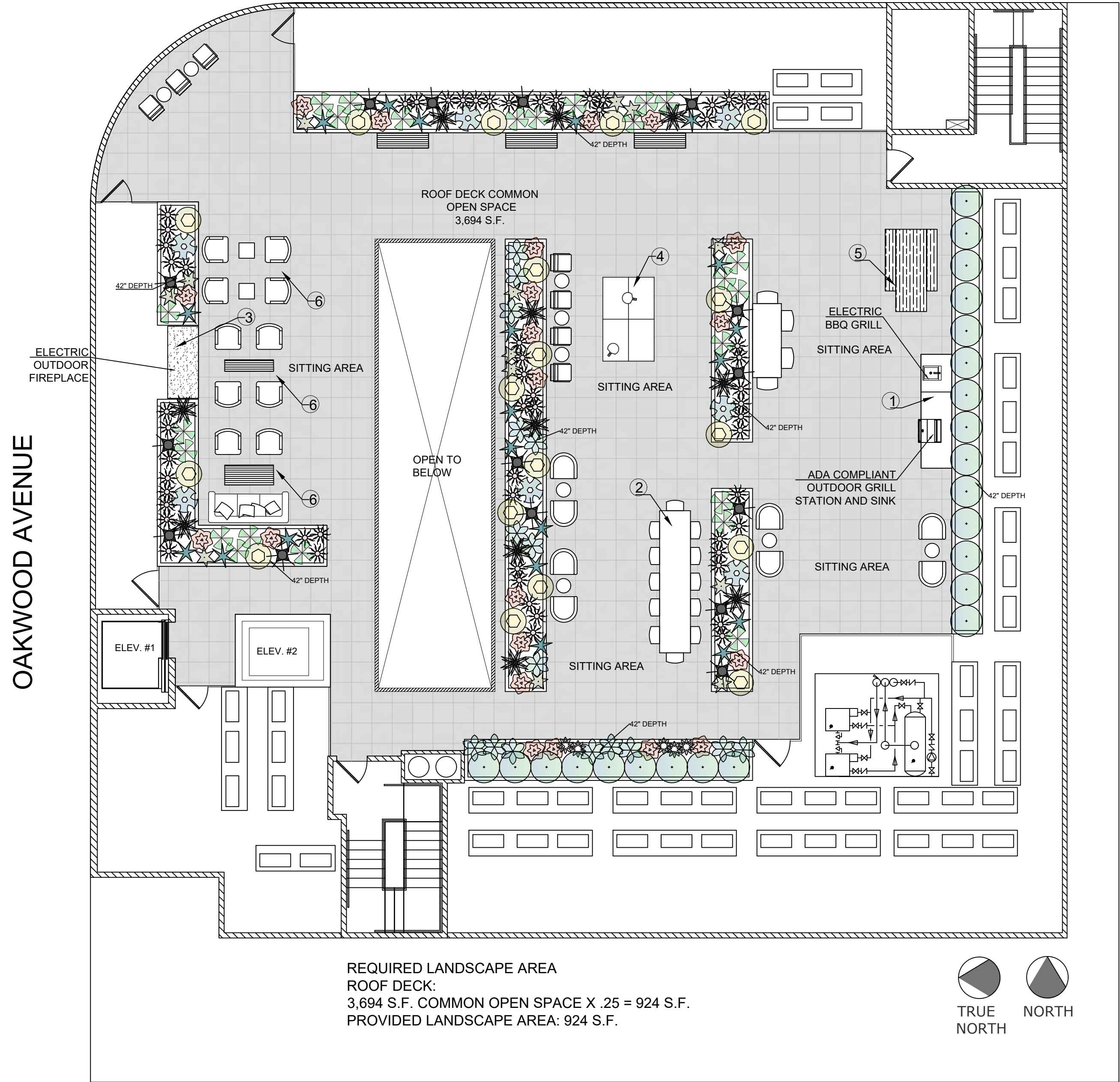
CONCEPTUAL
LANDSCAPE PLAN
2ND FLOOR

L-1.1

PLANT LEGEND - ROOF

	BOTANICAL NAME	COMMON NAME	SIZE AT 5 YRS.	QUANTITY	PLANT TYPE	WUCOLS
	AEONIUM 'MINT SAUCER'	AEONIUM	2' X 3'	24	SUCCULENT	0.3/L
	AGAVE BRACTEOSA 'CALAMAR'	SQUID AGAVE	3' X 3'	15	SUCCULENT	0.3/L
	AGAVE LOPANTHA 'QUADRICOLOR'	QUADRICOLOR CENTURY PLANT	18" X 18"	11	SUCCULENT	0.3/L
	ALOE STRIATA	CORAL ALOE	2' X 2'	16	SUCCULENT	0.3/L
	DIANELLA REVOLUTA 'LITTLE REV'	LITTLE REV FLAX LILY	2' X 2'	59	GRASS LIKE	0.3/L
	GRAPTOVERIA 'FRED IVES'	GRAPTOVERIA	1' X 2'	13	SUCCULENT	0.3/L

	BOTANICAL NAME	COMMON NAME	SIZE AT 5 YRS.	QUANTITY	PLANT TYPE	WUCOLS
	KALANCHOE THYRSIFLORA	FLAPJACKS	1' X 2'	21	SUCCULENT	0.3/L
	MANGAVE 'MISSION TO MARS'	MANGAVE	2' X 3'	7	SUCCULENT	0.3/L
	OLEA EUROPAEA 'LITTLE OLLIE'	LITTLE OLLIE DWARF OLIVE	4' X 4'	23	SHRUB	0.3/L
	PHORMIUM TENAX 'TOM THUMB'	TOM THUMB FLAX	2' X 2'	5	PERENNIAL	0.3/L
	PORTULACARIA AFRA MINIMA	ELEPHANT'S FOOD	<1' X 3'	18	SUCCULENT	0.3/L
	SENECIO MANDRALISCAE	BLUE CHALK STICKS	2' X 2'	20	SUCCULENT	0.3/L



CONCEPTUAL LANDSCAPE PLAN - ROOF
SCALE: 1/8" = 1'-0"

KEY NOTES

1.GRILL STATION



2. COMMUNAL DINING



5. PICNIC TABLE



3. OUTDOOR FIREPLACE



4. PING PONG TABLE

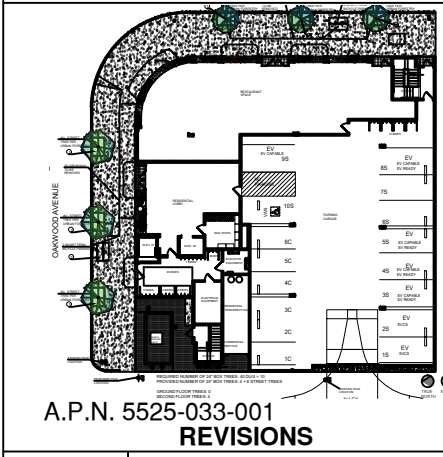
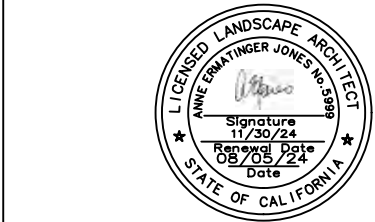


6. SITTING AREA



LA BREA APARTMENTS
361 N. LA BREA AVENUE
LOS ANGELES CA 90036

VIRIDITAS
DESIGN
Landscape Architecture
Anne Jones
RLA CA 5999
viriditasdesigngroup@gmail.com
2735 W. Avenue 33
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323.377.1018



ARCHITECT:
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OWNER:
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11627 TELEGRAPH RD, SUITE 200
SANTA FE SPRINGS, CA 90067
323.301.9115

DATE:
AUGUST 5, 2024
SCALE:
1/8" = 1'-0"
CONCEPTUAL
LANDSCAPE PLAN
ROOF



AEONIUM



AUSTRALIAN WILLOW



BLUE CHALK STICKS



BLUE FLAME AGAVE



COPPERTONE SEDUM



CORAL ALOE



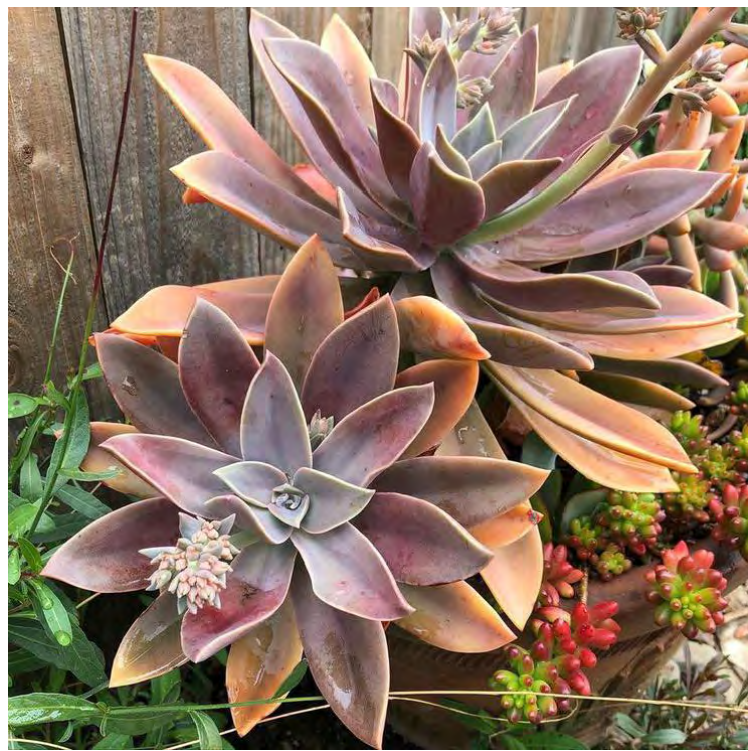
ELEPHANT'S FOOD



FIDDLE LEAF FIG



FLAPJACKS



GRAPTOVERIA



ICEE BLUE PODOCARPUS



KIWI AEONIUM



LITTLE REV FLAX LILY



LITTLE OLLIE DWARF OLIVE



MANGAVE



MARINA STRAWBERRY TREE



MOTHER-IN-LAWS TONGUE



PEPPERMINT GERANIUM



QUADRICOLOR CENTURY PLANT



PALE PUMA SPIDERWORT



SQUID AGAVE



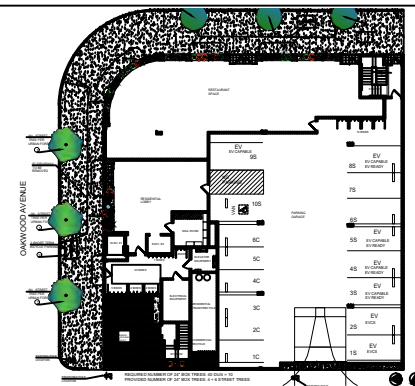
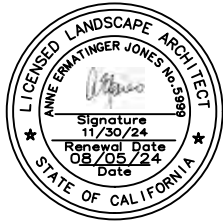
TRICOLOR JADE



ZZ PLANT

LA BREA APARTMENTS
361 N. LA BREA AVENUE
LOS ANGELES CA 90036

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DATE:
AUGUST 5, 2024
SCALE:
NONE
CONCEPTUAL
PLANT PALETTE
L-2

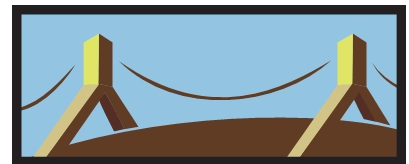
Exhibit B.1

Environmental Documents (ENV-2024-5978-CE)

Air Quality Report

361 NORTH LA BREA AVENUE PROJECT

Air Quality Technical Report



Prepared by DKA Planning
20445 Prospect Road, Suite C
San Jose, CA 95129
July 2024

AIR QUALITY TECHNICAL REPORT

Introduction

This technical report addresses the air quality impacts generated by construction and operation of a Proposed Project at 361 North La Brea Avenue in the City of Los Angeles. The analysis evaluates the consistency of the Project with air quality policies set forth in the South Coast Air Quality Management District's (SCAQMD) Air Quality Management Plan (AQMP) and the City's General Plan. The analysis of Project-generated air emissions focuses on whether the Project would cause an exceedance of an ambient air quality standard or SCAQMD significance threshold. Calculation worksheets, assumptions, and model outputs used in the analysis are included in the Technical Appendix to this analysis.

Regulatory Framework

Federal

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

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

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

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

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

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

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

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

State

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Regional (South Coast Air Quality Management District)

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

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

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

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

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

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

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

Regional (Southern California Association of Governments)

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

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

Local (City of Los Angeles)

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

The Air Quality Element includes six key goals:

- Goal 1:** Good air quality and mobility in an environment of continued population growth and healthy economic structure.
- Goal 2:** Less reliance on single-occupant vehicles with fewer commute and non-work trips.
- Goal 3:** Efficient management of transportation facilities and system infrastructure using cost-effective system management and innovative demand management techniques.

- Goal 4:** Minimize impacts of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.
- Goal 5:** Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels and the implementation of conservation measures including passive measures such as site orientation and tree planting.
- Goal 6:** Citizen awareness of the linkages between personal behavior and air pollution and participation in efforts to reduce air pollution.

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

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

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

Land Use Compatibility. In November 2012, the Los Angeles City Planning Commission (CPC) issued an advisory notice (Zoning Information 2427) regarding the siting of sensitive land uses within 1,000 feet of freeways. The CPC deemed 1,000 feet to be a conservative distance to evaluate projects that house populations considered to be more at-risk from the negative effects of air pollution caused by freeway proximity. The CPC advised that applicants of projects requiring discretionary approval, located within 1,000 feet of a freeway and contemplating residential units and other sensitive uses (e.g., hospitals, schools, retirement homes) perform a Health Risk Assessment (HRA). The Project Site is 2.2 miles northeast of the southbound mainline of the Hollywood Freeway (US-101).

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

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

Existing Conditions

Pollutants and Effects

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

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

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

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

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

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

levels of particulates appear to worsen the effect of sulfur dioxide, and long-term exposures to both pollutants leads to higher rates of respiratory illness.

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

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

State-Only Criteria Pollutants

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

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

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

Vinyl Chloride. Vinyl chloride is a colorless, flammable gas at ambient temperature and pressure. It is also highly toxic and is classified as a known carcinogen by the American Conference of Governmental Industrial Hygienists and the International Agency for Research on Cancer. At room temperature, vinyl chloride is a gas with a sickly-sweet odor that is easily condensed. However, it is stored at cooler temperatures as a liquid. Due to the hazardous nature of vinyl chloride to human health, there are no end products that use vinyl chloride in its monomer form. Vinyl chloride is a chemical intermediate, not a final product. It is an important industrial chemical chiefly used to produce polyvinyl chloride (PVC).

The process involves vinyl chloride liquid fed to polymerization reactors where it is converted from a monomer to a polymer PVC. The final product of the polymerization process is PVC in either a flake or pellet form. Billions of pounds of PVC are sold on the global market each year. From its flake or pellet form, PVC is sold to companies that heat and mold the PVC into end products such as PVC pipe and bottles. Vinyl chloride emissions are historically associated primarily with landfills.

Toxic Air Contaminants (TACs)

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

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

Exposure to DPM may be a health hazard, particularly to children whose lungs are still developing and the elderly who may have other serious health problems. DPM levels and resultant potential health effects may be higher in close proximity to heavily traveled roadways with substantial truck traffic or near industrial facilities. According to CARB, DPM exposure may lead to the following adverse health effects: (1) aggravated asthma; (2) chronic bronchitis; (3) increased respiratory and cardiovascular hospitalizations; (4) decreased lung function in children; (5) lung cancer; and (6) premature deaths for people with heart or lung disease.^{8,9}

Project Site

The Project Site is located within the South Coast Air Basin (the Basin); named so because of its geographical formation is that of a basin, with the surrounding mountains trapping the air and its pollutants in the valleys or basins below. The 6,745-square-mile Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. It is bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino and San Jacinto Mountains to the north and east; and the San Diego County line to the south. Ambient pollution concentrations recorded in Los

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

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

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

Angeles County portion of the Basin are among the highest in the four counties comprising the Basin. USEPA has classified Los Angeles County as nonattainment areas for O₃, PM_{2.5}, and lead. This classification denotes that the Basin does not meet the NAAQS for these pollutants. In addition, under the CCAA, the Los Angeles County portion of the Basin is designated as a nonattainment area for O₃, PM₁₀, and PM_{2.5}. The air quality within the Basin is primarily influenced by a wide range of emissions sources, such as dense population centers, heavy vehicular traffic, industry, and meteorology.

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

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

Air Monitoring Data. The SCAQMD monitors air quality conditions at 38 source receptor areas (SRA) throughout the Basin. The Project Site is located in SCAQMD's Central Los Angeles receptor area. Historical data from the area was used to characterize existing conditions in the vicinity of the Project area. Table 2 shows pollutant levels, State and federal standards, and the number of exceedances recorded in the area from 2021 through 2023. The one-hour State standard for O₃ was exceeded three times during this three-year period. The federal standard was exceeded 15 times in that same period. In addition, the daily State standard for PM₁₀ was exceeded nine times. The daily federal standard for PM_{2.5} was exceeded twelve times. CO, SO₂, and NO₂ levels did not exceed the CAAQS from 2021 to 2023 for 1-hour (and 8-hour for CO).

Existing Health Risk in the Surrounding Area. Based on the MATES-V model, the calculated cancer risk in the Project area (zip code 90036) is approximately 495 in a million.¹⁰ The cancer risk in this area is predominantly influenced by nearby sources of diesel particulate matter (e.g., diesel trucks and traffic on the Hollywood Freeway 2.2 miles to the southwest). In general, the risk at the Project Site is higher than 63 percent of the population across the South Coast Air Basin.

¹⁰ South Coast Air Quality Management District, Multiple Air Toxics Exposure Study in the South Coast Air Basin (MATES-V), MATES V Interactive Carcinogenicity Map, 2021, https://experience.arcgis.com/experience/79d3b6304912414bb21ebdde80100b23/page/home/?data_id=data_Source_105-a5ba9580e3aa43508a793fac819a5a4d%3A26&views=view_39%2Cview_1, accessed June 30, 2024.

Table 2
Ambient Air Quality Data

Pollutants and State and Federal Standards	Maximum Concentrations and Frequencies of Exceedance Standards		
	2021	2022	2023
Ozone (O₃)			
Maximum 1-hour Concentration (ppm)	0.099	0.138	0.097
Days > 0.09 ppm (State 1-hour standard)	1	1	1
Days > 0.070 ppm (Federal 8-hour standard)	2	6	7
Carbon Monoxide (CO₂)			
Maximum 1-hour Concentration (ppm)	2.0	1.7	1.4
Days > 20 ppm (State 1-hour standard)	0	0	0
Maximum 8-hour Concentration (ppm)	1.6	1.5	1.2
Days > 9.0 ppm (State 8-hour standard)	0	0	0
Nitrogen Dioxide (NO₂)			
Maximum 1-hour Concentration (ppm)	0.0778	0.0751	0.0643
Days > 0.18 ppm (State 1-hour standard)	0	0	0
PM₁₀			
Maximum 24-hour Concentration (µg/m ³)	64	60	57
Days > 50 µg/m ³ (State 24-hour standard)	3	4	2
PM_{2.5}			
Maximum 24-hour Concentration (µg/m ³)	61.0	33.7	30.6
Days > 35 µg/m ³ (Federal 24-hour standard)	12	0	0
Sulfur Dioxide (SO₂)			
Maximum 1-hour Concentration (ppb)	2.2	6.5	7.7
Days > 0.25 ppm (State 1-hour standard)	0	0	0
ppm = parts by volume per million of air. µg/m ³ = micrograms per cubic meter. N/A = not available at this monitoring station. Source: SCAQMD annual monitoring data at Central LA subregion (http://www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year) accessed June 28, 2024.			

The Office of Environmental Health Hazard Assessment, on behalf of the California Environmental Protection Agency (CalEPA), provides a screening tool called CalEnviroScreen that can be used to help identify California communities disproportionately burdened by multiple sources of pollution. According to CalEnviroScreen, the Project Site (Census tract 6037214000) is located in the 52nd percentile, which means the Project Site has an overall environmental pollution burden higher than at least 52 percent of other communities within California.¹¹

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

¹¹ Office of Environmental Health Hazard Assessment, <https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40>, accessed June 30, 2024.

centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes.

The Project Site is located along the largely commercial zone of La Brea Avenue in the Hancock Park neighborhood. Sensitive receptors within 0.25 miles of the Project Site include, but are not limited to, the following representative sampling:

- Residences, Detroit Street (300 block); residences as close as 30 feet west of the Project Site.
- Residences, Detroit Street (400 block); residences as close as 90 feet northwest of the Project Site.
- Residences, Sycamore Avenue; 230 feet east of the Project Site.

Existing Project Site Emissions. The Project Site is improved with a 2,975 square-foot commercial building and 6,950 square-foot surface parking lot.¹² To ensure a conservative analysis, this report does not “credit” any criteria pollutant emissions that would be removed by the Proposed Project.

Project Impacts

Methodology

The air quality analysis conducted for the Project is consistent with the methods described in the SCAQMD CEQA Air Quality Handbook (1993 edition), as well as the updates to the CEQA Air Quality Handbook, as provided on the SCAQMD website. The SCAQMD recommends the use of the California Emissions Estimator Model (CalEEMod) as a tool for quantifying emissions of air pollutants that will be generated by constructing and operating development projects. The analyses focus on the potential emissions from construction and operation of the Project. Methodologies used to evaluate these emissions are discussed below.

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

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

Localized impacts were analyzed in accordance with the SCAQMD Localized Significance Threshold (LST) methodology.¹³ The localized effects from on-site portion of daily emissions were evaluated at

¹² City of Los Angeles, ZIMAS database, accessed June 29, 2024.

¹³ South Coast Air Quality Management District, Final Localized Significance Methodology, revised July 2008.

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

LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. The mass rate look-up tables were developed for each source receptor area and can be used to determine whether or not a project may generate significant adverse localized air quality impacts. SCAQMD provides LST mass rate look-up tables for projects with active construction areas that are less than or equal to five acres. If the project exceeds the LST look-up values, then the SCAQMD recommends that project-specific air quality modeling must be performed. Please refer to **Threshold b** below, for the analysis of localized impacts from on-site construction activities. In accordance with SCAQMD guidance, maximum daily emissions of NO_x, CO, PM₁₀, and PM_{2.5} from on-site sources during each construction activity were compared to LST values for a one-acre site having sensitive receptors within 25 meters (82 feet).¹⁵ This is appropriate given the 0.24-acre site and the proximity of sensitive receptors as close as 30 feet from the Project Site across an alley to the west.

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

The significance criteria and analysis methodologies in the SCAQMD's CEQA Air Quality Handbook were used in evaluating impacts in the context of the CEQA significance criteria listed below. The SCAQMD LSTs for NO₂, CO, and PM₁₀ were initially published in June 2003 and revised in July 2008.¹⁶ The LSTs for PM_{2.5} were established in October 2006 and updated on October 21, 2009.^{17 18} Table 3 presents the significance criteria for both construction and operational emissions.

¹⁴ South Coast Air Quality Management District, LST Methodology Appendix C-Mass Rate LST Look-Up Table, <https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf?sfvrsn=2>, October 2009.

¹⁵ South Coast Air Quality Management District, Fact Sheet for Applying CalEEMod to Localized Significance Thresholds, <https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/caleemod-guidance.pdf>, 2008.

¹⁶ Ibid.

¹⁷ South Coast Air Quality Management District, Final – Methodology to Calculate Particulate Matter (PM) 2.5 and PM 2.5 Significance Thresholds, [https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/particulate-matter-\(pm\)-2.5-significance-thresholds-and-calculation-methodology/final_pm2_5methodology.pdf](https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/particulate-matter-(pm)-2.5-significance-thresholds-and-calculation-methodology/final_pm2_5methodology.pdf), October 2006.

¹⁸ South Coast Air Quality Management District, Final Localized Significance Threshold Methodology Appendix C – Mass Rate LST Look-Up Tables, <https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf?sfvrsn=2>, October 21, 2009.

Table 3
SCAQMD Emissions Thresholds

Criteria Pollutant	Construction Emissions		Operation Emissions	
	Regional	Localized /a/	Regional	Localized /a/
Volatile Organic Compounds (VOC)	75	--	55	--
Nitrogen Oxides (NO _x)	100	74	55	74
Carbon Monoxide (CO)	550	680	550	680
Sulfur Oxides (SO _x)	150	--	150	--
Respirable Particulates (PM ₁₀)	150	5	150	2
Fine Particulates (PM _{2.5})	55	3	55	1
/a/ Localized significance thresholds assumed a one-acre and 25-meter (82-foot) receptor distance in the Central LA source receptor area. The SCAQMD has not developed LST values for VOC or SO _x . Pursuant to SCAQMD guidance, sensitive receptors closer than 25 meters to a construction site are to use the LSTs for receptors at 25 meters (SCAQMD Final Localized Significance Threshold Methodology, June 2008).				
Source: SCAQMD, South Coast AQMD Air Quality Significance Thresholds, 2023				

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

Similar to construction, SCAQMD's CalEEMod software was used for the evaluation of Project emissions during operation. CalEEMod was used to calculate on-road fugitive dust, architectural coatings, landscape equipment, energy use, mobile source, and stationary source emissions.¹⁹ To determine if a significant air quality impact would occur, the net increase in regional and local operational emissions generated by the Project was compared against SCAQMD's significance thresholds.²⁰ Details describing the operational emissions of the Project can be found in in the Technical Appendix.

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

¹⁹ Energy consumption estimates with CalEEMod 2022.1.1.25 are based on the California Energy Commission's 2020 Residential Appliance Saturation Survey (residential uses) and 2021 Commercial Forecast database, both of which reflected the 2019 Title 24 energy efficiency standards. These energy consumption estimates were adjusted to reflect the 2022 Title 24 standards that cumulatively produce a 0.49 percent reduction in electricity use and 0.45 percent reduction in natural gas use when compared to the 2019 standards.

²⁰ South Coast Air Quality Management District, Air Quality Significance Thresholds, revised March 2015. SCAQMD based these thresholds, in part on the federal Clean Air Act and, to enable defining "significant" for CEQA purposes, defined the setting as the South Coast Air Basin. (See SCAQMD, CEQA Air Quality Handbook, April 1993, pp. 6-1-6-2).

Thresholds of Significance

State CEQA Guidelines Appendix G

Would the Project:

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

City and SCAQMD Thresholds

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

(a) *Construction*

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

(i) *Combustion Emissions from Construction Equipment*

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

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

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

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

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

(iv) *Other Mobile Source Emissions*

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

In addition, the following criteria set forth in the SCAQMD's *CEQA Air Quality Handbook* serve as quantitative air quality standards to be used to evaluate project impacts under the Appendix G Thresholds. Under these thresholds, a significant threshold would occur when:²¹

- Regional emissions from both direct and indirect sources would exceed any of the following SCAQMD prescribed threshold levels: (1) 100 pounds per day for NO_x; (2) 75 pounds a day for VOC; (3) 150 pounds per day for PM₁₀ or SO_x; (4) 55 pounds per day for PM_{2.5}; and (5) 550 pounds per day for CO.
- Maximum on-site daily localized emissions exceed the LST, resulting in predicted ambient concentrations in the vicinity of the Project Site greater than the most stringent ambient air quality standards for CO (20 ppm [23,000 µg/m³] over a 1-hour period or 9.0 ppm [10,350 µg/m³] averaged over an 8-hour period) and NO₂ (0.18 ppm [339 µg/m³] over a 1-hour period, 0.1 ppm [188 µg/m³] over a three-year average of the 98th percentile of the daily maximum 1-hour average, or 0.03 ppm [57 µg/m³] averaged over an annual period).
- Maximum on-site localized PM₁₀ or PM_{2.5} emissions during construction exceed the applicable LSTs, resulting in predicted ambient concentrations in the vicinity of the Project Site to exceed the incremental 24-hour threshold of 10.4 µg/m³ or 1.0 µg/m³ PM₁₀ averaged over an annual period.

(b) Operation

The City bases the determination of significance of operational air quality impacts on criteria set forth in the SCAQMD's *CEQA Air Quality Handbook*.²² As discussed above, the City uses Appendix G as the thresholds of significance for this analysis. Accordingly, the following serve as quantitative air quality standards to be used to evaluate project impacts under the Appendix G thresholds. Under these thresholds, a significant threshold would occur when:

- Operational emissions exceed 10 tons per year of volatile organic gases or any of the following SCAQMD prescribed threshold levels: (1) 55 pounds a day for VOC;²³ (2) 55 pounds per day for NO_x; (3) 550 pounds per day for CO; (4) 150 pounds per day for SO_x; (5) 150 pounds per day for PM₁₀; and (6) 55 pounds per day for PM_{2.5}.²⁴
- Maximum on-site daily localized emissions exceed the LST, resulting in predicted ambient concentrations in the vicinity of the Project Site greater than the most stringent ambient air quality standards for CO (20 parts per million (ppm) over a 1-hour period or 9.0 ppm averaged over an

²¹ South Coast Air Quality Management District, Air Quality Significance Thresholds, revised March 2015.

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

²³ For purposes of this analysis, emissions of VOC and reactive organic compounds (ROG) are used interchangeably since ROG represents approximately 99.9 percent of VOC emissions.

²⁴ South Coast Air Quality Management District, Quality Significance Thresholds, www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf, last updated March 2015.

8-hour period) and NO₂ (0.18 ppm over a 1-hour period, 0.1 ppm over a 3-year average of the 98th percentile of the daily maximum 1-hour average, or 0.03 ppm averaged over an annual period).²⁵

- Maximum on-site localized operational PM₁₀ and PM_{2.5} emissions exceed the incremental 24-hour threshold of 2.5 µg/m³ or 1.0 µg/m³ PM₁₀ averaged over an annual period.²⁶
- The Project causes or contributes to an exceedance of the California 1-hour or 8-hour CO standards of 20 or 9.0 ppm, respectively; or
- The Project creates an odor nuisance pursuant to SCAQMD Rule 402.

(c) *Toxic Air Contaminants*

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

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

In assessing impacts related to TACs in this section, the City uses Appendix G as the thresholds of significance. The criteria identified above will be used where applicable and relevant to assist in analyzing the Appendix G thresholds. In addition, the following criteria set forth in the SCAQMD's *CEQA Air Quality Handbook* serve as quantitative air quality standards to be used to evaluate project impacts under Appendix G thresholds. Under these thresholds, a significant threshold would occur when:²⁷

- The Project results in the exposure of sensitive receptors to carcinogenic or toxic air contaminants that exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0.²⁸ For projects with a maximum incremental cancer risk between 1 in one million and 10 in one million, a project would result in a significant impact if the cancer burden exceeds 0.5 excess cancer cases.

(d) *Consistency with Applicable Air Quality Plans*

CEQA Guidelines Section 15125 requires an analysis of project consistency with applicable governmental plans and policies. This analysis is conducted to assess potential project impacts against

²⁵ South Coast Air Quality Management District, Final Localized Significance Threshold Methodology, revised July 2008.

²⁶ South Coast Air Quality Management District, Final—Methodology to Calculate Particulate Matter (PM) 2.5 and PM_{2.5} Significance Thresholds, October 2006.

²⁷ South Coast Air Quality Management District, *CEQA Air Quality Handbook*, April 1993, Chapter 6 (Determining the Air Quality Significance of a Project) and Chapter 10 (Assessing Toxic Air Pollutants).

²⁸ Hazard index is the ratio of a toxic air contaminant's concentration divided by its Reference Concentration, or safe exposure level. If the hazard index exceeds one, people are exposed to levels of TACs that may pose noncancer health risks.

Threshold (a) from the Appendix G thresholds. In accordance with the SCAQMD's *CEQA Air Quality Handbook*, the following criteria are used to evaluate a project's consistency with the AQMP:²⁹

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

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

Project Design Features. The Project would comply with the 2022 Los Angeles Green Building Code (LAGBC),³⁰ which will build upon and set higher standards than those in the 2022 California Green Building Standards Code (CalGreen, effective January 1, 2023).³¹ Construction in later years could be subject to the future 2025 LAGBC and CalGreen standards. Further energy efficiency and sustainability features would include native plants and drip/subsurface irrigation systems, individual metering or sub metering for water use, leak detection systems, and electric vehicle charging capacity. In accordance with City Ordinance 187714, the Project would be all-electric with the exception of any cooking equipment associated with any restaurants or eating facilities and any gas-powered emergency backup systems.

The Project's lower off-street parking supply (i.e., 16 spaces for 40 residences and commercial space) will reduce car ownership rates and resulting vehicle use that will reduce energy and air quality emissions. The Project's infill location is a design feature that would promote the concentration of development in an urban location with access to transportation infrastructure and public transit facilities. This would reduce vehicle miles traveled (VMT) for residents, workers, and visitors who want options to driving cars.

²⁹ South Coast Air Quality Management District, *CEQA Air Quality Handbook*, April 1993, p. 12-3.

³⁰ City of Los Angeles Department of Building and Safety: <http://ladbs.org/forms-publications/forms/green-building>.

³¹ California Building Codes: <http://www.bsc.ca.gov/Codes.aspx>.

Analysis of Project Impacts

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

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

With respect to the determination of consistency with AQMP growth assumptions, the projections in the AQMP for achieving air quality goals are based on assumptions in SCAG's 2020-2045 RTP/SCS regarding population, housing, and growth trends.³² Determining whether a project exceeds the assumptions reflected in the AQMP involves the evaluation of three criteria: (1) consistency with applicable population, housing, and employment growth projections; (2) project mitigation measures; and (3) appropriate incorporation of AQMP land use planning strategies. The following discussion provides an analysis with respect to each of these three criteria.

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

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

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

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

The City provided local growth forecasts that were incorporated into the regional projections. The Project Site is classified as "General Commercial" in the General Plan Framework and zoned C2 (Commercial Zone), which permits residential uses as permitted in the R4 Multiple Dwelling Zone. As such, the RTP/SCS' assumptions about growth in the City accommodate the projected population and housing on the Project Site. As a result, the Project would be consistent with the growth assumptions in the City's General Plan. Because the AQMP accommodates growth forecasts from local General Plans, the

³² While SCAG adopted the 2024-2050 RTP/SCS on April 4, 2024, the region's applicable air quality plan is the 2022 AQMP, which is based on the growth assumptions of the 2020-2045 RTP/SCS. Once the 2022 AQMP is updated with these growth forecasts, consistency with the projections in the applicable air quality plan for the region will be based on the 2024-2050 RTP/SCS.

emissions associated with this Project are accounted for and mitigated in the region's air quality attainment plans. The air quality impacts of development on the Project Site are accommodated in the region's emissions inventory for the 2020-2045 RTP/SCS and 2022 AQMP

Based on the average 2020 persons-per-household rate for the City of 2.42 persons per household,³³ the Project would add a net residential population of approximately 97 people to the Project Site based on the 40 dwelling units proposed. The Project's residential population would represent approximately 0.01 percent of the forecast population growth between 2016 and 2045 and be consistent with the local growth assumptions that formed the basis of the region's AQMP.

Development of the Project also would result in a nominal number of employment positions on-site, based on the 2,155 square feet of commercial space proposed. However, the removal of the existing 2,975 office would eliminate a comparable number of jobs, resulting in no net loss of jobs on-site. Thus, the Project's estimated employment impact would not conflict with the local job growth assumptions that formed the basis of the region's AQMP. As a result, the Project would be consistent with the growth projections in the AQMP.

- Does the project implement feasible air quality mitigation measures?

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

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

With regard to land use developments, the AQMP's air quality policies focus on the reduction of vehicle trips and VMT. The Project would implement a number of land use policies of the City of Los Angeles, SCAQMD, and SCAG, as it would be designed and constructed to support and promote environmental sustainability. The Project represents an infill development within an urbanized area that would concentrate more housing, jobs, and population within a high quality transit area (HQTa). "Green" principles are incorporated throughout the Project to comply with the City of Los Angeles Green Building Code and CALGreen through energy conservation, water conservation, and waste reduction features. In accordance with City Ordinance 187714, the Project would be all-electric with the exception of any cooking equipment associated with any restaurants or eating facilities and any gas-powered emergency backup systems.

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

³³ Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, July 31, 2019.

City of Los Angeles Policies

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

- The Project Site is within a HQTAs, which reflects areas with rail transit service or bus service where lines have peak headways of less than 15 minutes.³⁴
- The Project Site is located in a Transit Priority Area, which are locations within one-half mile of a major transit stop with bus or rail transit service with frequencies of 15 minutes or less.
- The Project Site is considered a Transit Oriented Communities (TOC) Tier 3 based on the shortest distance between any point on the lot and qualified Major Transit Stops.³⁵
- Because of its location and TOC status, the Project will reduce on-site parking supply that will by definition reduce car ownership and resulting vehicle travel.
- There is substantial public transit service in the area, including:
 - Metro Line 212 which provides north-south service along La Brea Avenue, with a bus stop directly across La Brea Avenue for northbound travel and a southbound stop across Oakwood Avenue.
 - Metro Line 14 connects Downtown Los Angeles with Cedars-Sinai and West Los Angeles via Beverly Boulevard. A bus stop is located on Beverly Boulevard at Poinsettia Place.
 - Antelope Valley Transit Authority Line 786 (Century City/West Los Angeles) connects Palmdale/Lancaster with West Los Angeles, with a stop on La Brea Avenue one block south of the Project Site.
- The project will provide six short- and 37 long-term bicycle parking spaces on-site for residents and the commercial tenants.

The City's General Plan Air Quality Element identifies 30 policies with specific strategies for advancing the City's clean air goals. As illustrated in Table 4, the Project is consistent with the applicable policies in the Air Quality Element, as the Project would implement sustainability features that would reduce vehicular trips, reduce VMT, and encourage the use of alternative modes of transportation. Therefore, the Project would result in a less than significant impact related to consistency with the Air Quality Element.

³⁴ Southern California Association of Governments Data Portal https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_active-transportation.pdf?1606001530,

³⁵ Major Transit Stop is a site containing a rail station or the intersection of two or more bus routes with a service interval of 15 minutes or less during the morning and afternoon peak commute periods. The stations or bus routes may be existing, under construction or included in the most recent Southern California Association of Governments (SCAG) Regional Transportation Plan (RTP).

Table 4
Project Consistency with City of Los Angeles General Plan Air Quality Element

Goal/Objective/Policy	Project Consistency
Goal 1. Good air quality and mobility in an environment of continued population growth and healthy economic structure.	Consistent. The Project's infill and mixed-use profile will reduce vehicle travel and associated criteria pollutants over development on greenfield sites outside the urban core and be consistent with the region's AQMP attainment plan.
Goal 2. Less reliance on single-occupant vehicles with fewer commute and non-work trips.	Consistent. The Project's infill and mixed-use profile will reduce car ownership and resulting single-occupant vehicle trips for commute and non-work trips.
Goal 4. Minimal impact of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.	Consistent. The Project addresses the relationship between land use, transportation, and air quality with its infill location in proximity to numerous bus transit alternatives to driving alone. This reduces mobile source emissions and contributes to the region's AQMP attainment plan by limiting the impacts of development and resulting vehicle emissions.
Goal 5. Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels, and the implementation of conservation measures including passive methods such as site orientation and tree planting.	Consistent. The Project's infill and mixed-use profile will reduce car ownership and resulting single-occupant vehicle trips for commute and non-work trips. The use of electricity for the majority of land uses at the Project Site will substantially reduce VOC and other emissions from combustion of fossil fuels. The inclusion of electric vehicle charging facilities will support the efforts to expand use of non-polluting electric vehicles.
Objective 1.1. It is the objective of the City of Los Angeles to reduce air pollutants consistent with the Regional Air Quality Management Plan (AQMP), increase traffic mobility, and sustain economic growth citywide.	Consistent. The Project is consistent with the growth forecasts that underly the attainment demonstration in the 2022 AQMP. As such, the Project reduces air pollutants consistent with the AQMP.
Objective 1.3. It is the objective of the City of Los Angeles to reduce particulate air pollutants emanating from unpaved areas, parking lots, and construction sites.	Consistent. The Project would reduce particulate emissions during construction activities through compliance with SCAQMD Rule 403 (Fugitive Dust) that will reduce PM ₁₀ and PM _{2.5} emissions from unpaved areas.
Objective 2.1. It is the objective of the City of Los Angeles to reduce work trips as a step towards attaining trip reduction objectives necessary to achieve regional air quality goals.	Consistent. The Project's infill location, mix of uses, and proximity to bus transit will reduce work trips, as the high transit mode split for commuting will help attain trip reduction objectives consistent with the 2020 RTP and 2022 AQMP.
Objective 4.2. It is the objective of the City of Los Angeles to reduce vehicle trips and vehicle miles traveled associated with land use patterns.	Consistent. The Project's infill location, mix of uses, and proximity to bus transit will reduce all trips, as the high transit mode split and active transportation options will help attain trip reduction objectives consistent with the 2020 RTP and 2022 AQMP.
Objective 5.1. It is the objective of the City of Los Angeles to increase energy efficiency of City facilities and private developments.	Consistent. The Project would advance the City's energy efficiency objectives. The use of electricity for the majority of land uses at the Project Site will substantially reduce VOC and other emissions from

Table 4
Project Consistency with City of Los Angeles General Plan Air Quality Element

Goal/Objective/Policy	Project Consistency
	combustion of fossil fuels. The inclusion of electric vehicle charging facilities will support the efforts to expand use of non-polluting electric vehicles.
Policy 1.3.1. Minimize particulate emissions from construction sites.	Consistent. The Project would minimize particulate emissions during construction through best practices and/or SCAQMD rules (e.g., Rule 403, Fugitive Dust).
Policy 1.3.2. Minimize particulate emissions from unpaved roads and parking lots associated with vehicular traffic.	Not Applicable. The Project would not involve use of unpaved roads or parking lots.
Policy 2.1.1. Utilize compressed work weeks and flextime, telecommuting, carpooling, vanpooling, public transit, and improve walking/bicycling related facilities in order to reduce vehicle trips and/or VMT as an employer and encourage the private sector to do the same to reduce work trips and traffic congestion.	Consistent. The proposed development would include retail/restaurant employees and residents that could access transportation options to driving to work. The Project's reduced off-street parking supply (16 spaces for 40 residents and commercial tenant(s)) will ensure low car ownership rates that will reduce vehicle travel and VMT. In turn, the Project Site is well-served by public transit, including Metro Lines 14 and 212 on Beverly Boulevard and La Brea Avenue, respectively, and commuter bus service to and from the Antelope Valley. Employees, residents, and visitors can use six short- and 37 long-term bicycle parking spaces on-site.
Policy 2.1.2. Facilitate and encourage the use of telecommunications (i.e., telecommuting) in both the public and private sectors, in order to reduce work trips.	Consistent. Residents could use high-speed telecommunications services as an alternative to driving to work. A June 2020 study by the National Bureau of Economic Research found that 37 percent of jobs can be performed entirely from home (https://www.nber.org/papers/w26948). As such, the Proposed Project could help reduce commuting to work through telecommuting.
Policy 2.2.1. Discourage single-occupant vehicle use through a variety of measures such as market incentive strategies, mode-shift incentives, trip reduction plans and ridesharing subsidies.	Consistent. As the Project Site is classified as a TOC Tier 3 site, the Project would discourage single-occupant vehicle use because of the limited parking (16 spaces) for the 40 residences and merchants. Residents, workers, and visitors can use public transit, including Metro Lines 14 and 212 on Beverly Boulevard and La Brea Avenue, respectively, and commuter bus service to and from the Antelope Valley. Employees, residents, and visitors can use six short- and 37 long-term bicycle parking spaces on-site.
Policy 2.2.2. Encourage multi-occupant vehicle travel and discourage single-occupant vehicle travel by instituting parking management practices.	Consistent. As noted above, the Project Site's TOC Tier 3 status allows the garage to be limited to parking for 16 vehicles. This would discourage auto ownership and single-occupant vehicle use. The development would provide transportation options to residents, workers, and visitors as an option to driving.
Policy 2.2.3. Minimize the use of single-occupant vehicles associated with special	Not Applicable. The Project would not include facilities for special events.

Table 4
Project Consistency with City of Los Angeles General Plan Air Quality Element

Goal/Objective/Policy	Project Consistency
events or in areas and times of high levels of pedestrian activities.	
Policy 3.2.1. Manage traffic congestion during peak hours.	Consistent. The Project is a low traffic generator because of the nature of residential uses, which generate peak hour vehicle trips that are lower than commercial, retail, and restaurant uses. Further, the Project would also minimize traffic congestion based on its location near transit opportunities, which would encourage the use of alternative modes of transportation. Residents, workers, and visitors can use public transit, including Metro Lines 14 and 212 on Beverly Boulevard and La Brea Avenue, respectively, and commuter bus service to and from the Antelope Valley. Employees, residents, and visitors can use six short- and 37 long-term bicycle parking spaces on-site.
Policy 4.1.1. Coordinate with all appropriate regional agencies on the implementation of strategies for the integration of land use, transportation, and air quality policies.	Not Applicable. This policy is directed at the City and not individual development projects. Nonetheless, the Project is being considered for approval by the City of Los Angeles, which coordinates with SCAG, Metro, and other regional agencies on the coordination of land use, air quality, and transportation policies.
Policy 4.1.2. Ensure that project level review and approval of land use development remains at the local level.	Consistent. The Project would be entitled and environmentally cleared at the local level. The Project would not inhibit the implementation of this policy.
Policy 4.2.1. Revise the City's General Plan/Community Plans to achieve a more compact, efficient urban form and to promote more transit-oriented development and mixed-use development.	Not Applicable. This policy calls for City updates to its General Plan. The Project would not inhibit the implementation of this policy.
Policy 4.2.2. Improve accessibility for the City's residents to places of employment, shopping centers and other establishments.	Consistent. The Project would be infill development that would provide the City's residents with proximate access to jobs and services at this Project Site.
Policy 4.2.3. Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.	Consistent. The Project would promote public transit, active transportation, and alternative fuel vehicles for residents, workers, and visitors, who can use public transit, including Metro Lines 14 and 212 on Beverly Boulevard and La Brea Avenue, respectively, and commuter bus service to and from the Antelope Valley. Employees, residents, and visitors can use six short- and 37 long-term bicycle parking spaces on-site. The Project would also include four electric vehicle charging stations and one more space with conduits and supplies for future charging stations.
Policy 4.2.4. Require that air quality impacts be a consideration in the review and approval of all discretionary projects.	Consistent. The Project's air quality impacts are analyzed in this document, and as discussed herein, all impacts with respect to air quality would be less than significant.

Table 4
Project Consistency with City of Los Angeles General Plan Air Quality Element

Goal/Objective/Policy	Project Consistency
Policy 4.2.5. Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.	Consistent. The proposed project would support use of alternative transportation modes. The Project Site is well-served by public transit, including Metro Lines 14 and 212 on Beverly Boulevard and La Brea Avenue, respectively, and commuter bus service to and from the Antelope Valley. Employees, residents, and visitors can use six short- and 37 long-term bicycle parking spaces on-site.
Policy 4.3.1. Revise the City's General Plan/Community Plans to ensure that new or relocated sensitive receptors are located to minimize significant health risks posed by air pollution sources.	Not Applicable. This policy calls for City updates to its General Plan. The Project would not inhibit the implementation of this policy.
Policy 4.3.2. Revise the City's General Plan/Community Plans to ensure that new or relocated major air pollution sources are located to minimize significant health risks to sensitive receptors.	Not Applicable. This policy calls for City updates to its General Plan. The Project would not inhibit the implementation of this policy.
Policy 5.1.1. Make improvements in Harbor and airport operations and facilities in order to reduce air emissions.	Not Applicable. This policy calls for cleaner operations of the City's water port and airport facilities. The Project would not inhibit the implementation of this policy.
Policy 5.1.2. Effect a reduction in energy consumption and shift to non-polluting sources of energy in its buildings and operations.	Not Applicable. This policy calls for cleaner operations of the City's buildings and operations. The Project would not inhibit the implementation of this policy.
Policy 5.1.3. Have the Department of Water and Power make improvements at its in-basin power plants in order to reduce air emissions.	Not Applicable. This policy calls for cleaner operations of the City's Water and Power energy plants. The Project would not inhibit the implementation of this policy.
Policy 5.1.4. Reduce energy consumption and associated air emissions by encouraging waste reduction and recycling.	Consistent. The Project would be consistent with this policy by complying with Title 24, CALGreen, and other requirements to reduce solid waste and energy consumption. This includes the City's March 2010 ordinance (Council File 09-3029) that requires all mixed construction and demolition waste be taken to City-certified waste processors.
Policy 5.2.1. Reduce emissions from its own vehicles by continuing scheduled maintenance, inspection and vehicle replacement programs; by adhering to the State of California's emissions testing and monitoring programs; by using alternative fuel vehicles wherever feasible, in accordance with regulatory agencies and City Council policies.	Not Applicable. This policy calls for the City to gradually reduce the fleet emissions inventory from its vehicles through use of alternative fuels, improved maintenance practices, and related operational improvements. The Project's support of electric vehicles will continue the State's conversion to zero emission fleets that do not required engine inspections
Policy 5.3.1. Support the development and use of equipment powered by electric or low-emitting fuels.	Consistent. The Project would be designed to meet the applicable requirements of the States Green Building Standards Code and the City of Los Angeles' Green Building Code, both of which promote a shift from

Table 4
Project Consistency with City of Los Angeles General Plan Air Quality Element

Goal/Objective/Policy	Project Consistency
	natural gas use toward electrification of buildings. The Project would also include four electric vehicle charging stations and one more space with conduits and supplies for future charging stations. The Project would be powered by electricity, pursuant to City Ordinance 187714, with possible exceptions for any restaurant use on the Project Site.
Policy 6.1.1. Raise awareness through public-information and education programs of the actions that individuals can take to reduce air emissions.	Not Applicable. This policy calls for the City to promote clean air awareness through its public awareness programs. The Project would not inhibit the implementation of this policy.
Source: DKA Planning, 2024.	

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

Less Than Significant Impact.

Construction

A cumulatively considerable net increase would occur if the project's construction impacts substantially contribute to air quality violations when considering other projects that may undertake construction activities at the same time. Individual projects that generate emissions that do not exceed SCAQMD's significance thresholds would not contribute considerably to any potential cumulative impact. SCAQMD neither recommends quantified analyses of the emissions generated by a set of cumulative development projects nor provides thresholds of significance to assess the impacts associated with these emissions.³⁶

Construction-related emissions were estimated using the SCAQMD's CalEEMod 2022.1.1.25 model and a projected construction schedule of at least 24 months. Table 5 summarizes the potential construction schedule that was modeled for air quality impacts.

³⁶ South Coast Air Quality Management District, 2003 White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution, <https://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper.pdf>: "As Lead Agency, the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR...Projects that exceed the project-specific significance threshold are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are not considered to be cumulatively significant."

Table 5
Construction Schedule Assumptions

Phase	Duration	Notes
Demolition	Month 1	Removal of 2,975 square-foot commercial building and 6,950 square feet of asphalt/concrete parking lot hauled 30 miles to landfill in 10-cubic yard capacity trucks.
Grading	Month 2	Fine grading for balanced grading plan. Includes drilling of piles and shoring of excavated site.
Trenching	Month 3	Trenching for utilities, including gas, water, electricity, and telecommunications.
Building Construction	Months 4-24	Footings and foundation work, framing, welding; installing mechanical, electrical, and plumbing. Floor assembly, cabinetry and carpentry, elevator installations, low voltage systems, trash management.
Architectural Coatings	Months 19-24	Application of interior and exterior coatings and sealants.
Source: DKA Planning, 2024.		

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

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

Regional Emissions

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

Fugitive dust emissions would peak during grading activities, where fine grading would level the site for the above-ground improvements. All construction projects in the Basin must comply with SCAQMD Rule

403 for fugitive dust, which include measures to prevent visible dust plumes. Other measures include, but are not limited to, applying water and/or soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system or other control measures to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project Site, and maintaining effective cover over exposed areas. Compliance with Rule 403 would reduce regional PM_{2.5} and PM₁₀ emissions associated with construction activities by approximately 61 percent.

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

As shown in Table 6, construction of the Project would produce VOC, NO_x, CO, SO_x, PM₁₀ and PM_{2.5} emissions that do not exceed the SCAQMD's regional thresholds. As a result, construction of the Project would not contribute substantially to an existing violation of air quality standards for regional pollutants (e.g., ozone). This impact is considered less than significant.

Localized Emissions

In addition to maximum daily regional emissions, maximum localized (on-site) emissions were quantified for each construction activity. The localized construction air quality analysis was conducted using the methodology promulgated by the SCAQMD. Look-up tables provided by the SCAQMD were used to determine localized construction emissions thresholds for the Project.³⁷ LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard and are based on the most recent background ambient air quality monitoring data (2021-2023) for the Project area.

Table 6
Daily Construction Emissions

Construction Phase Year	Daily Emissions (Pounds Per Day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
2026	1.1	9.2	10.1	<0.1	2.6	1.4
2027	2.7	5.7	10.4	<0.1	0.7	0.3
Maximum Regional Total	2.7	9.2	10.4	<0.1	2.6	1.4
Regional Threshold	75	100	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Maximum Localized Total	1.0	9.2	9.7	<0.1	2.5	1.4
Localized Threshold	N/A	74	680	N/A	5	3
Exceed Threshold?	N/A	No	No	N/A	No	No

³⁷ South Coast Air Quality Management District, LST Methodology Appendix C-Mass Rate LST Look-Up Table, <https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf?sfvrsn=2>, October 2009.

Table 6
Daily Construction Emissions

The construction dates are used for the modeling of air quality emissions in the CalEEMod software. If construction activities commence later than what is assumed in the environmental analysis, the actual emissions would be lower than analyzed because of the increasing penetration of newer equipment with lower certified emission levels. Assumes implementation of SCAQMD Rule 403 (Fugitive Dust Emissions)

Source: DKA Planning, 2024 based on CalEEMod 2022.1.1.25 model runs. LST analyses based on one-acre site with 25-meter distances to receptors in Central LA source receptor area. Estimates reflect the peak summer or winter season, whichever is higher. Totals may not add up due to rounding. Modeling sheets included in the Technical Appendix.

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

As shown in Table 6, above, the Project would produce emissions that do not exceed the SCAQMD's recommended localized standards of significance for NO₂ and CO during the construction phase. Similarly, construction activities would not produce PM₁₀ and PM_{2.5} emissions that exceed localized thresholds recommended by the SCAQMD. These estimates assume the use of Best Available Control Measures (BACMs) that address fugitive dust emissions of PM₁₀ and PM_{2.5} through SCAQMD Rule 403. This would include watering portions of the site that are disturbed during grading activities and minimizing tracking of dirt onto local streets. Therefore, construction impacts on localized air quality are considered less than significant.

Operation

Operational emissions of criteria pollutants would come from area, energy, and mobile sources. Area sources include consumer products such as household cleaners, architectural coatings for routine maintenance, and landscaping equipment.³⁸ Energy sources include electricity and natural gas use for space cooling and heating and water heating. The CalEEMod model generates estimates of emissions from energy use based on the land use type and size. The Project would also produce long-term air quality impacts to the region primarily from motor vehicles that access the Project Site. The Project could add approximately 180 vehicle trips to local roadways and the region's air quality airshed on a weekday at the start of operations in 2028.

As shown in Table 7, the Project's emissions would not exceed the SCAQMD's regional or localized significance thresholds. Therefore, the operational impacts of the Project on regional and localized air quality are considered less than significant.

³⁸ In 2021, CARB adopted regulations requiring that all small (25 horsepower and below) spark-ignited off-road engines (e.g., lawn and gardening equipment) be zero emission starting in model year 2024. Standards for portable generators and large pressure washers are given until model year 2028 to be electric-powered.

Table 7
Daily Operations Emissions

Emissions Source	Daily Emissions (Pounds Per Day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area Sources	1.2	<0.1	2.6	<0.1	<0.1	<0.1
Energy Sources	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
Mobile Sources	0.5	0.4	4.2	<0.1	1.0	0.3
Regional Total	1.7	0.4	6.8	<0.1	1.0	0.3
Regional Significance Threshold	55	55	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Net Localized Total	1.2	<0.1	2.6	<0.1	<0.1	<0.1
Localized Significance Threshold	N/A	74	680	N/A	2	1
Exceed Threshold?	N/A	No	No	N/A	No	No
<i>LST analyses based on one-acre site with 25-meter distances to receptors in Central Los Angeles SRA</i> <i>Source: DKA Planning, 2024 based on CalEEMod 2022.1.1.25 model runs (included in the Technical Appendix). Totals reflect the summer season maximum and may not add up due to rounding.</i>						

c. Expose sensitive receptors to substantial pollutant concentrations?

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

- Residences, Detroit Street (300 block); residences as close as 30 feet west of the Project Site.
- Residences, Detroit Street (400 block); residences as close as 90 feet northwest of the Project Site.
- Residences, Sycamore Avenue; 230 feet east of the Project Site.

Construction

Construction of the Project could expose sensitive receptors to substantial pollutant concentrations if maximum daily emissions of regulated pollutants generated by sources located on and/or near the Project Site exceeded the applicable LST values presented in Table 3, or if construction activities generated significant emissions of TACs that could result in carcinogenic risks or non-carcinogenic hazards exceeding the SCAQMD Air Quality Significance Thresholds of ten excess cancers per million or non-carcinogenic Hazard Index greater than 1.0, respectively. As discussed above, the LST values were derived by the SCAQMD for the criteria pollutants NO_x, CO, PM₁₀, and PM_{2.5} to prevent the occurrence of concentrations exceeding the air quality standards at sensitive receptor locations based on proximity and construction site size.

As shown in Table 6, during construction of the Project, maximum daily localized unmitigated emissions of NO₂, CO, PM₁₀, and PM_{2.5} from sources on the Project Site would remain below each of the respective LST values. Unmitigated maximum daily localized emissions would not exceed any of the localized

standards for receptors that are within 25 meters of the Project's construction activities. Therefore, based on SCAQMD guidance, localized emissions of criteria pollutants would not have the potential to expose sensitive receptors to substantial concentrations that would present a public health concern.

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

Furthermore, according to SCAQMD methodology, health risks from carcinogenic air toxics are usually described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of TACs over a 30-year period will contract cancer based on the use of standard risk-assessment methodology. The entire duration of construction activities associated with implementation of the Project is anticipated to be approximately 24 months, and the magnitude of diesel PM emissions will vary over this time period. No residual emissions and corresponding individual cancer risk are anticipated after construction. Because there is such a short-term exposure period, construction TAC emissions would result in a less than significant impact. Therefore, construction of the Project would not expose sensitive receptors to substantial diesel PM concentrations, and this impact would be less than significant.

Operation

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

When considering potential air quality impacts under CEQA, consideration is given to the location of sensitive receptors within close proximity of land uses that emit TACs. CARB has published and adopted the Air Quality and Land Use Handbook: A Community Health Perspective, which provides recommendations regarding the siting of new sensitive land uses near potential sources of air toxic emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities).³⁹ The SCAQMD adopted similar recommendations in its Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning.⁴⁰ Together, CARB and SCAQMD guidelines recommend siting distances for both the development of sensitive land uses in proximity to TAC sources and the addition of new TAC sources in proximity to existing sensitive land uses.

The primary sources of potential air toxics associated with Project operations include DPM from delivery trucks (e.g., truck traffic on local streets and idling on adjacent streets) and to a lesser extent, facility

³⁹ California Air Resources Board, Air Quality and Land Use Handbook, a Community Health Perspective, April 2005.

⁴⁰ South Coast Air Quality Management District, Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, May 6, 2005.

operations (e.g., natural gas fired boilers). However, these activities, and the land uses associated with the Project, are not considered land uses that generate substantial TAC emissions. It should be noted that the SCAQMD recommends that health risk assessments (HRAs) be conducted for substantial individual sources of DPM (e.g., truck stops and warehouse distribution facilities that generate more than 100 trucks per day or more than 40 trucks with operating transport refrigeration units) and has provided guidance for analyzing mobile source diesel emissions.⁴¹ Based on this guidance, the Project would not include these types of land uses and is not considered to be a substantial source of DPM warranting a refined HRA since daily truck trips to the Project Site would not exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units. In addition, CARB-mandated airborne toxic control measures (ATCM) limits diesel-fueled commercial vehicles (delivery trucks) to idle for no more than five minutes at any given time, which would further limit diesel particulate emissions.

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

The Project would generate long-term emissions on-site from area and energy sources that would generate negligible pollutant concentrations of CO, NO₂, PM_{2.5}, or PM₁₀ at nearby sensitive receptors. While long-term operations of the Project would add traffic to local roads that produces off-site emissions, these would not result in exceedances of CO air quality standards at roadways in the area due to three key factors. First, CO hotspots are extremely rare and only occur in the presence of unusual atmospheric conditions and extremely cold conditions, neither of which applies to this Project area. Second, auto-related emissions of CO continue to decline because of advances in fuel combustion technology in the vehicle fleet. Finally, the Project would not contribute to the levels of congestion that would be needed to produce emissions concentrations needed to trigger a CO hotspot, as it would add 180 vehicle trips to the local roadway network on weekdays when the development could be leased and operational in 2028. The majority of vehicle-related impacts at the Project Site would come from 15 and 17 vehicles entering and exiting the development during the peak A.M. and P.M. hours, respectively.⁴² This would represent a small addition to traffic volumes on local roadways. For example, it would represent 4.5 percent of the 3,995 vehicles currently using La Brea Avenue at Oakwood Avenue in the A.M. peak hour, conservatively assuming all vehicles used La Brea Avenue.⁴³ Assuming peak hour volumes represent ten percent of daily volumes, this intersection would carry 39,950 daily vehicle trips, well below the traffic volumes that would be needed to generate CO exceedances of the ambient air quality standard.⁴⁴

⁴¹ South Coast Air Quality Management District, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis, 2002.

⁴² DKA Planning, 2024. Hourly trip generation based on Institute of Transportation Engineer's hourly trip generation factors for Multifamily Housing (Mid-Rise) (land use code 221).

⁴³ DKA Planning, 2024, based on City of Los Angeles database of traffic volumes on La Brea Avenue at Oakwood Avenue, https://navigatela.lacity.org/dot/traffic_data/manual_counts/13171_LABOAK93.pdf; traffic counts adjusted by one percent growth factor to represent existing conditions.

⁴⁴ South Coast Air Quality Management District; 2003 AQMP. As discussed in the 2003 AQMP, the 1992 CO Plan included a CO hotspot analysis at four intersections in the peak A.M. and P.M. time periods, including Long Beach Boulevard and Imperial Highway (Lynwood), Wilshire Boulevard and Veteran Avenue (Westwood), Sunset Boulevard and Highland Avenue (Hollywood), and La Cienega Boulevard and Century Boulevard (Inglewood). The busiest intersection was Wilshire and Veteran, used by 100,000 vehicles per day. The 2003 AQMP estimated a 4.6 ppm one-hour concentration at this intersection, which meant that an exceedance (20 ppm) would not occur until daily traffic exceeded more than 400,000 vehicles per day.

Finally, the Project would not result in any substantial emissions of TACs during the construction or operations phase. During the construction phase, the primary air quality impacts would be associated with the combustion of diesel fuels, which produce exhaust-related particulate matter that is considered a toxic air contaminant by CARB based on chronic exposure to these emissions.⁴⁵ However, construction activities would not produce chronic, long-term exposure to diesel particulate matter. During long-term project operations, the Project does not include typical sources of acutely and chronically hazardous TACs such as industrial manufacturing processes and automotive repair facilities. As a result, the Project would not create substantial concentrations of TACs.

In addition, the SCAQMD recommends that health risk assessments be conducted for substantial sources of diesel particulate emissions (e.g., truck stops and warehouse distribution facilities) and has provided guidance for analyzing mobile source diesel emissions.⁴⁶ The Project would not generate a substantial number of truck trips. Based on the limited activity of TAC sources, the Project would not warrant the need for a health risk assessment associated with on-site activities. Therefore, the Project's operational impacts on local sensitive receptors would be less than significant.

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

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

Cumulative Impacts

While the Proposed Project would generate short- and long-term emissions during the construction and operations phases, respectively, the presence of any other development projects could produce cumulative impacts. The City of Los Angeles confirmed that there are no related projects within 1,500 feet of the Project Site.⁴⁷

AQMP Consistency

Cumulative development is not expected to result in a significant impact in terms of conflicting with, or obstructing implementation of the 2022 AQMP. As discussed previously, growth considered to be consistent with the AQMP would not interfere with attainment because this growth is included in the projections utilized in the formulation of the AQMP. Consequently, as long as growth in the Basin is within the projections for growth identified in the 2020-2045 RTP/SCS, implementation of the AQMP will not be obstructed by such growth. In addition, as discussed previously, the population and job growth resulting from the Project would be consistent with the growth projections of the AQMP. Any related project would implement feasible air quality mitigation measures to reduce the criteria air pollutants, if

⁴⁵ California Office of Environmental Health Hazard Assessment. Health Effects of Diesel Exhaust. [www.http://oehha.ca.gov/public_info/facts/dieselfacts.html](http://oehha.ca.gov/public_info/facts/dieselfacts.html)

⁴⁶ South Coast Air Quality Management District, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions, December 2002.

⁴⁷ Personal communication. Ira Rodriguez, Transportation Engineering Associate II; City of Los Angeles Department of Transportation; July 2, 2024.

required due to any significant emissions impacts. In addition, each related project would be evaluated for its consistency with the land use policies set forth in the AQMP. Therefore, the Project's contribution to the cumulative impact would not be cumulatively considerable and, therefore, would be less than significant.

Construction

SCAQMD recommends that any construction-related emissions and operational emissions from individual development projects that exceed the project-specific mass daily emissions thresholds identified above also be considered cumulatively considerable.⁴⁸ Individual projects that generate emissions not in excess of SCAQMD's significance thresholds would not contribute considerably to any potential cumulative impact. SCAQMD neither recommends quantified analyses of the emissions generated by a set of cumulative development projects nor provides thresholds of significance to be used to assess the impacts associated with these emissions.

As summarized in Table 6, the Proposed Project would not exceed the SCAQMD's mass emissions thresholds and would not contribute to any potential cumulative impact. If any related project was projected to exceed LST thresholds (after mitigation), it could perform dispersion modeling to confirm whether health-based air quality standards would be violated. The SCAQMD's LST thresholds recognize the influence of a receptor's proximity, setting mass emissions thresholds for PM₁₀ and PM_{2.5} that generally double with every doubling of distance.

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

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

Operation

⁴⁸ White Paper on Regulatory Options for Addressing Cumulative Impacts from Air Pollution Emissions, SCAQMD Board Meeting, September 5, 2003, Agenda No. 29, Appendix D, p. D-3.

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

With respect to TAC emissions, neither the Project nor any likely related projects (which are largely residential, retail/commercial in nature), would represent a substantial source of TAC emissions, which are typically associated with large-scale industrial, manufacturing, and transportation hub facilities. The Project and related projects would be consistent with the recommended screening level siting distances for TAC sources, as set forth in CARB's Land Use Guidelines, and the Project and related projects would not result in a cumulative impact requiring further evaluation. However, any related projects could generate minimal TAC emissions related to the use of consumer products and landscape maintenance activities, among other things. Pursuant to AB 1807, which directs the CARB to identify substances as TACs and adopt airborne toxic control measures to control such substances, the SCAQMD has adopted numerous rules (primarily in Regulation XIV) that specifically address TAC emissions. These SCAQMD rules have resulted in and will continue to result in substantial Basin-wide TAC emissions reductions. As such, cumulative TAC emissions during long-term operations would be less than significant. Therefore, the Project would not result in any substantial sources of TACs that have been identified by the CARB's Land Use Guidelines, and thus, would not contribute to a cumulative impact.

TECHNICAL APPENDIX



DOUGLASKIM+ASSOCIATES,LLC

FUTURE EMISSIONS

361 North La Brea Avenue (Future) Detailed Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	361 North La Brea Avenue (Future)
Construction Start Date	1/1/2026
Operational Year	2028
Lead Agency	City of Los Angeles
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	0.50
Precipitation (days)	16.8
Location	361 N La Brea Ave, Los Angeles, CA 90036, USA
County	Los Angeles-South Coast
City	Los Angeles
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	4302
EDFZ	16
Electric Utility	Los Angeles Department of Water & Power
Gas Utility	Southern California Gas
App Version	2022.1.1.25

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 Mid Rise	40.0	Dwelling Unit	0.20	38,463	928	—	97.0	—
Strip Mall	2.15	1000sqft	0.04	2,155	0.00	—	—	—
Enclosed Parking with Elevator	16.0	Space	0.00	6,400	0.00	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

Sector	#		Measure Title					
Transportation	T-1		Increase Residential Density					
Transportation	T-3		Provide Transit-Oriented Development					
Transportation	T-4		Integrate Affordable and Below Market Rate Housing					
Transportation	T-15		Limit Residential Parking Supply					
Energy	E-15		Require All-Electric Development					

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

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

Un/Mit.	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Unmit.	2.71	5.71	10.4	0.02	0.19	0.55	0.74	0.17	0.13	0.30
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Unmit.	2.70	9.22	10.1	0.02	0.42	2.17	2.59	0.39	1.02	1.41
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—
Unmit.	1.19	3.80	6.75	0.01	0.14	0.40	0.53	0.13	0.12	0.25
Annual (Max)	—	—	—	—	—	—	—	—	—	—

Unmit.	0.22	0.69	1.23	< 0.005	0.03	0.07	0.10	0.02	0.05
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2.2. Construction Emissions by Year, Unmitigated

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

Year	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—
2026	0.62	5.13	9.08	0.01	0.19	0.47	0.66	0.17	0.11	0.29
2027	2.71	5.71	10.4	0.02	0.19	0.55	0.74	0.17	0.13	0.30
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—
2026	1.05	9.22	10.1	0.02	0.42	2.17	2.59	0.39	1.02	1.41
2027	2.70	5.75	10.1	0.02	0.19	0.55	0.74	0.17	0.13	0.30
Average Daily	—	—	—	—	—	—	—	—	—	—
2026	0.43	3.63	5.80	0.01	0.14	0.40	0.53	0.13	0.12	0.25
2027	1.19	3.80	6.75	0.01	0.13	0.36	0.49	0.12	0.09	0.20
Annual	—	—	—	—	—	—	—	—	—	—
2026	0.08	0.66	1.06	< 0.005	0.03	0.07	0.10	0.02	0.02	0.05
2027	0.22	0.69	1.23	< 0.005	0.02	0.07	0.09	0.02	0.02	0.04

2.3. Construction Emissions by Year, Mitigated

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

Year	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—
2026	0.62	5.13	9.08	0.01	0.19	0.47	0.66	0.17	0.11	0.29
2027	2.71	5.71	10.4	0.02	0.19	0.55	0.74	0.17	0.13	0.30

Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	
2026	1.05	9.22	10.1	0.02	0.42	2.17	2.59	0.39	1.02	1.41
2027	2.70	5.75	10.1	0.02	0.19	0.55	0.74	0.17	0.13	0.30
Average Daily	—	—	—	—	—	—	—	—	—	—
2026	0.43	3.63	5.80	0.01	0.14	0.40	0.53	0.13	0.12	0.25
2027	1.19	3.80	6.75	0.01	0.13	0.36	0.49	0.12	0.09	0.20
Annual	—	—	—	—	—	—	—	—	—	—
2026	0.08	0.66	1.06	< 0.005	0.03	0.07	0.10	0.02	0.02	0.05
2027	0.22	0.69	1.23	< 0.005	0.02	0.07	0.09	0.02	0.02	0.04

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)										
Un/Mit.	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Unmit.	2.13	0.76	10.1	0.02	0.02	1.74	1.76	0.02	0.44	0.46
Mit.	1.73	0.38	6.85	0.01	0.01	0.97	0.98	0.01	0.25	0.25
% Reduced	19%	49%	33%	45%	61%	44%	44%	63%	44%	45%
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Unmit.	1.86	0.79	6.96	0.02	0.02	1.74	1.76	0.02	0.44	0.46
Mit.	1.46	0.39	3.90	0.01	0.01	0.97	0.98	0.01	0.25	0.25
% Reduced	22%	51%	44%	46%	67%	44%	44%	68%	44%	45%
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—
Unmit.	1.98	0.77	8.52	0.02	0.02	1.62	1.64	0.02	0.41	0.43
Mit.	1.60	0.39	5.55	0.01	0.01	0.90	0.91	0.01	0.23	0.24
% Reduced	19%	50%	35%	46%	64%	44%	44%	66%	44%	45%

Annual (Max)	—	—	—	—	—	—	—	—	—	
Unmit.	0.36	0.14	1.55	< 0.005	< 0.005	0.29	0.30	< 0.005	0.07	0.08
Mit.	0.29	0.07	1.01	< 0.005	< 0.005	0.16	0.17	< 0.005	0.04	0.04
% Reduced	19%	50%	35%	46%	64%	44%	44%	66%	44%	45%

2.5. Operations Emissions by Sector, Unmitigated

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

Sector	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Mobile	0.93	0.63	7.46	0.02	0.01	1.74	1.75	0.01	0.44	0.45
Area	1.20	0.02	2.65	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Energy	0.01	0.10	0.05	< 0.005	0.01	—	0.01	0.01	—	0.01
Water	—	—	—	—	—	—	—	—	—	—
Waste	—	—	—	—	—	—	—	—	—	—
Refrig.	—	—	—	—	—	—	—	—	—	—
Total	2.13	0.76	10.1	0.02	0.02	1.74	1.76	0.02	0.44	0.46
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Mobile	0.92	0.69	6.91	0.02	0.01	1.74	1.75	0.01	0.44	0.45
Area	0.94	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Energy	0.01	0.10	0.05	< 0.005	0.01	—	0.01	0.01	—	0.01
Water	—	—	—	—	—	—	—	—	—	—
Waste	—	—	—	—	—	—	—	—	—	—
Refrig.	—	—	—	—	—	—	—	—	—	—
Total	1.86	0.79	6.96	0.02	0.02	1.74	1.76	0.02	0.44	0.46
Average Daily	—	—	—	—	—	—	—	—	—	—
Mobile	0.86	0.65	6.66	0.02	0.01	1.62	1.63	0.01	0.41	0.42

Area	1.12	0.02	1.81	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Energy	0.01	0.10	0.05	< 0.005	0.01	—	0.01	0.01	—	0.01
Water	—	—	—	—	—	—	—	—	—	—
Waste	—	—	—	—	—	—	—	—	—	—
Refrig.	—	—	—	—	—	—	—	—	—	—
Total	1.98	0.77	8.52	0.02	0.02	1.62	1.64	0.02	0.41	0.43
Annual	—	—	—	—	—	—	—	—	—	—
Mobile	0.16	0.12	1.22	< 0.005	< 0.005	0.29	0.30	< 0.005	0.07	0.08
Area	0.20	< 0.005	0.33	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Energy	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Water	—	—	—	—	—	—	—	—	—	—
Waste	—	—	—	—	—	—	—	—	—	—
Refrig.	—	—	—	—	—	—	—	—	—	—
Total	0.36	0.14	1.55	< 0.005	< 0.005	0.29	0.30	< 0.005	0.07	0.08

2.6. Operations Emissions by Sector, Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)										
Sector	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Mobile	0.53	0.36	4.20	0.01	0.01	0.97	0.98	0.01	0.25	0.25
Area	1.20	0.02	2.65	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Energy	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Water	—	—	—	—	—	—	—	—	—	—
Waste	—	—	—	—	—	—	—	—	—	—
Refrig.	—	—	—	—	—	—	—	—	—	—
Total	1.73	0.38	6.85	0.01	0.01	0.97	0.98	0.01	0.25	0.25

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—
Mobile	0.52	0.39	3.90	0.01	0.01	0.97	0.98	0.01	0.25
Area	0.94	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00
Energy	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	< 0.005
Water	—	—	—	—	—	—	—	—	—
Waste	—	—	—	—	—	—	—	—	—
Refrig.	—	—	—	—	—	—	—	—	—
Total	1.46	0.39	3.90	0.01	0.01	0.97	0.98	0.01	0.25
Average Daily	—	—	—	—	—	—	—	—	—
Mobile	0.48	0.37	3.74	0.01	0.01	0.90	0.91	0.01	0.23
Area	1.12	0.02	1.81	< 0.005	< 0.005	—	< 0.005	< 0.005	< 0.005
Energy	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	< 0.005
Water	—	—	—	—	—	—	—	—	—
Waste	—	—	—	—	—	—	—	—	—
Refrig.	—	—	—	—	—	—	—	—	—
Total	1.60	0.39	5.55	0.01	0.01	0.90	0.91	0.01	0.23
Annual	—	—	—	—	—	—	—	—	—
Mobile	0.09	0.07	0.68	< 0.005	< 0.005	0.16	0.17	< 0.005	0.04
Area	0.20	< 0.005	0.33	< 0.005	< 0.005	—	< 0.005	< 0.005	< 0.005
Energy	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	< 0.005
Water	—	—	—	—	—	—	—	—	—
Waste	—	—	—	—	—	—	—	—	—
Refrig.	—	—	—	—	—	—	—	—	—
Total	0.29	0.07	1.01	< 0.005	< 0.005	0.16	0.17	< 0.005	0.04

3. Construction Emissions Details

3.1. Demolition (2026) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.44	4.09	5.58	0.01	0.13	—	0.13	0.12	—	0.12
Demolition	—	—	—	—	—	0.22	0.22	—	0.03	0.03
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.25	0.34	< 0.005	0.01	—	0.01	0.01	—	0.01
Demolition	—	—	—	—	—	0.01	0.01	—	< 0.005	< 0.005
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.05	0.06	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Demolition	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.04	0.55	0.00	0.00	0.13	0.13	0.00	0.03	0.03
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Hauling	< 0.005	0.36	0.14	< 0.005	< 0.005	0.08	0.08	< 0.005	0.02	0.03
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005
Annual	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005

3.2. Demolition (2026) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)										
Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.44	4.09	5.58	0.01	0.13	—	0.13	0.12	—	0.12
Demolition	—	—	—	—	—	0.22	0.22	—	0.03	0.03
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.25	0.34	< 0.005	0.01	—	0.01	0.01	—	0.01
Demolition	—	—	—	—	—	0.01	0.01	—	< 0.005	< 0.005
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	< 0.005	0.05	0.06	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Demolition	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.04	0.55	0.00	0.00	0.13	0.13	0.00	0.03	0.03
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.36	0.14	< 0.005	< 0.005	0.08	0.08	< 0.005	0.02	0.03
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005
Annual	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005

3.3. Grading (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)										
Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	1.02	9.19	9.69	0.02	0.42	—	0.42	0.39	—	0.39
Dust From Material Movement	—	—	—	—	—	2.07	2.07	—	1.00	1.00
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.06	0.50	0.53	< 0.005	0.02	—	0.02	0.02	—	0.02
Dust From Material Movement	—	—	—	—	—	0.11	0.11	—	0.05	0.05
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.09	0.10	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Dust From Material Movement	—	—	—	—	—	0.02	0.02	—	0.01	0.01
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.41	0.00	0.00	0.10	0.10	0.00	0.02	0.02
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.02	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

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

3.4. Grading (2026) - Mitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.02	9.19	9.69	0.02	0.42	—	0.42	0.39	—	0.39
Dust From Material Movement	—	—	—	—	—	2.07	2.07	—	1.00	1.00
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.06	0.50	0.53	< 0.005	0.02	—	0.02	0.02	—	0.02
Dust From Material Movement	—	—	—	—	—	0.11	0.11	—	0.05	0.05
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.09	0.10	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005

Dust From Material Movement	—	—	—	—	—	0.02	0.02	—	0.01	0.01
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.41	0.00	0.00	0.10	0.10	0.00	0.02	0.02
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.02	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.5. Building Construction (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)										
Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.49	4.81	6.91	0.01	0.19	—	0.19	0.17	—	0.17

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.49	4.81	6.91	0.01	0.19	—	0.19	0.17	0.17
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.27	2.59	3.72	0.01	0.10	—	0.10	0.09	0.09
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.47	0.68	< 0.005	0.02	—	0.02	0.02	0.02
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—
Worker	0.12	0.12	2.08	0.00	0.00	0.42	0.42	0.00	0.10
Vendor	0.01	0.20	0.09	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—
Worker	0.12	0.14	1.77	0.00	0.00	0.42	0.42	0.00	0.10
Vendor	0.01	0.20	0.10	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—
Worker	0.06	0.08	1.00	0.00	0.00	0.22	0.22	0.00	0.05
Vendor	< 0.005	0.11	0.05	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—

Worker	0.01	0.01	0.18	0.00	0.00	0.04	0.04	0.00	0.01	0.01
Vendor	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.6. Building Construction (2026) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)										
Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.49	4.81	6.91	0.01	0.19	—	0.19	0.17	—	0.17
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.49	4.81	6.91	0.01	0.19	—	0.19	0.17	—	0.17
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.27	2.59	3.72	0.01	0.10	—	0.10	0.09	—	0.09
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.47	0.68	< 0.005	0.02	—	0.02	0.02	—	0.02
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.12	0.12	2.08	0.00	0.00	0.42	0.42	0.00	0.10	0.10

Vendor	0.01	0.20	0.09	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.01
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.12	0.14	1.77	0.00	0.00	0.42	0.42	0.00	0.10	0.10
Vendor	0.01	0.20	0.10	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.01
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.08	1.00	0.00	0.00	0.22	0.22	0.00	0.05	0.05
Vendor	< 0.005	0.11	0.05	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.18	0.00	0.00	0.04	0.04	0.00	0.01	0.01
Vendor	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.7. Building Construction (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)										
Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.48	4.56	6.90	0.01	0.17	—	0.17	0.15	—	0.15
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.48	4.56	6.90	0.01	0.17	—	0.17	0.15	—	0.15

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.34	3.25	4.93	0.01	0.12	—	0.12	0.11	—	0.11	—	0.11
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.06	0.59	0.90	< 0.005	0.02	—	0.02	0.02	—	0.02	—	0.02
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.11	0.11	1.93	0.00	0.00	0.42	0.42	0.00	0.10	0.10	—	0.10
Vendor	0.01	0.19	0.09	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.01	—	0.01
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.11	0.14	1.64	0.00	0.00	0.42	0.42	0.00	0.10	0.10	—	0.10
Vendor	0.01	0.19	0.09	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.01	—	0.01
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.10	1.23	0.00	0.00	0.30	0.30	0.00	0.07	0.07	—	0.07
Vendor	< 0.005	0.14	0.06	< 0.005	< 0.005	0.03	0.04	< 0.005	0.01	0.01	—	0.01
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.02	0.22	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	0.01
Vendor	< 0.005	0.03	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	< 0.005
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00

3.8. Building Construction (2027) - Mitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.48	4.56	6.90	0.01	0.17	—	0.17	0.15	—	0.15
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.48	4.56	6.90	0.01	0.17	—	0.17	0.15	—	0.15
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.34	3.25	4.93	0.01	0.12	—	0.12	0.11	—	0.11
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.06	0.59	0.90	< 0.005	0.02	—	0.02	0.02	—	0.02
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.11	0.11	1.93	0.00	0.00	0.42	0.42	0.00	0.10	0.10
Vendor	0.01	0.19	0.09	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.01
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—

Worker	0.11	0.14	1.64	0.00	0.00	0.42	0.42	0.00	0.10	0.10
Vendor	0.01	0.19	0.09	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.01
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.10	1.23	0.00	0.00	0.30	0.30	0.00	0.07	0.07
Vendor	< 0.005	0.14	0.06	< 0.005	< 0.005	0.03	0.04	< 0.005	0.01	0.01
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.02	0.22	0.00	0.00	0.05	0.05	0.00	0.01	0.01
Vendor	< 0.005	0.03	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.9. Architectural Coating (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)										
Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.11	0.83	1.13	< 0.005	0.02	—	0.02	0.02	—	0.02
Architectural Coatings	1.98	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.11	0.83	1.13	< 0.005	0.02	—	0.02	0.02	—	0.02
Architectural Coatings	1.98	—	—	—	—	—	—	—	—	—

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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.30	0.41	< 0.005	0.01	—	0.01	0.01	0.01	0.01	—	0.01	0.01
Architectural Coatings	0.71	—	—	—	—	—	—	—	—	—	—	—	—
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.05	0.07	< 0.005	< 0.005	—	< 0.005	—	< 0.005	< 0.005	—	< 0.005	< 0.005
Architectural Coatings	0.13	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.39	0.00	0.00	0.08	0.08	0.08	0.00	0.02	0.02	0.02	0.02
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.03	0.33	0.00	0.00	0.08	0.08	0.08	0.00	0.02	0.02	0.02	0.02
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.12	0.00	0.00	0.03	0.03	0.03	0.00	0.01	0.01	0.01	0.01
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.02	0.00	0.00	0.01	0.01	0.01	0.00	< 0.005	< 0.005	< 0.005	< 0.005

Vendor	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

3.10. Architectural Coating (2027) - Mitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.11	0.83	1.13	< 0.005	0.02	—	0.02	0.02	—	0.02
Architectural Coatings	1.98	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.11	0.83	1.13	< 0.005	0.02	—	0.02	0.02	—	0.02
Architectural Coatings	1.98	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.30	0.41	< 0.005	0.01	—	0.01	0.01	—	0.01
Architectural Coatings	0.71	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.05	0.07	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005

Architectural Coatings	0.13	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.39	0.00	0.00	0.08	0.08	0.00	0.02
Vendor	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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—
Worker	0.02	0.03	0.33	0.00	0.00	0.08	0.08	0.00	0.02
Vendor	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
Average Daily	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.12	0.00	0.00	0.03	0.03	0.00	0.01
Vendor	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
Annual	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.02	0.00	0.00	0.01	0.01	0.00	< 0.005
Vendor	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

3.11. Trenching (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)										
Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.18	1.25	1.43	< 0.005	0.05	—	0.05	0.05	0.05
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.08	0.09	< 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
Annual	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.01	0.02	< 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
Offsite	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.14	0.00	0.00	0.03	0.03	0.00	0.01
Vendor	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
Average Daily	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005
Vendor	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
Annual	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005
Vendor	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
Annual	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005
Vendor	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

3.12. Trenching (2026) - Mitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.18	1.25	1.43	< 0.005	0.05	—	0.05	0.05	—	0.05
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.08	0.09	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.01	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.14	0.00	0.00	0.03	0.03	0.00	0.01	0.01
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005

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

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	0.65	0.45	5.33	0.01	0.01	1.25	1.26	0.01	0.32	0.33
Strip Mall	0.28	0.18	2.12	0.01	< 0.005	0.48	0.49	< 0.005	0.12	0.13
Enclosed Parking with Elevator	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.93	0.63	7.46	0.02	0.01	1.74	1.75	0.01	0.44	0.45
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	0.64	0.49	4.94	0.01	0.01	1.25	1.26	0.01	0.32	0.33
Strip Mall	0.28	0.20	1.98	< 0.005	< 0.005	0.48	0.49	< 0.005	0.12	0.13

Enclosed Parking with Elevator	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.92	0.69	6.91	0.02	0.01	1.74	1.75	0.01	0.44	0.45
Annual	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	0.11	0.09	0.88	< 0.005	< 0.005	0.21	0.22	< 0.005	0.05	0.06
Strip Mall	0.05	0.03	0.34	< 0.005	< 0.005	0.08	0.08	< 0.005	0.02	0.02
Enclosed Parking with Elevator	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.16	0.12	1.22	< 0.005	< 0.005	0.29	0.30	< 0.005	0.07	0.08

4.1.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)										
Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	0.31	0.21	2.54	0.01	< 0.005	0.60	0.60	< 0.005	0.15	0.16
Strip Mall	0.22	0.14	1.66	< 0.005	< 0.005	0.38	0.38	< 0.005	0.10	0.10
Enclosed Parking with Elevator	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.53	0.36	4.20	0.01	0.01	0.97	0.98	0.01	0.25	0.25
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	0.31	0.23	2.35	0.01	< 0.005	0.60	0.60	< 0.005	0.15	0.16
Strip Mall	0.21	0.15	1.54	< 0.005	< 0.005	0.38	0.38	< 0.005	0.10	0.10

Enclosed Parking with Elevator	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.52	0.39	3.90	0.01	0.01	0.97	0.98	0.01	0.25
Annual	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	0.05	0.04	0.42	< 0.005	< 0.005	0.10	0.10	< 0.005	0.03
Strip Mall	0.04	0.03	0.26	< 0.005	< 0.005	0.06	0.06	< 0.005	0.02
Enclosed Parking with Elevator	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.09	0.07	0.68	< 0.005	< 0.005	0.16	0.17	< 0.005	0.04

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

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

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

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

4.2.2. Electricity Emissions By Land Use - Mitigated

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

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

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

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	0.01	0.10	0.04	< 0.005	0.01	—	0.01	0.01	—	0.01
Strip Mall	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Enclosed Parking with Elevator	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Total	0.01	0.10	0.05	< 0.005	0.01	—	0.01	0.01	—	0.01
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	0.01	0.10	0.04	< 0.005	0.01	—	0.01	0.01	—	0.01
Strip Mall	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005

Enclosed Parking with Elevator	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Total	0.01	0.10	0.05	< 0.005	0.01	—	0.01	0.01	—	0.01
Annual	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Strip Mall	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Enclosed Parking with Elevator	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Total	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005

4.2.4. Natural Gas Emissions By Land Use - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)										
Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Strip Mall	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Enclosed Parking with Elevator	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Total	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Strip Mall	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005

Enclosed Parking with Elevator	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Total	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Annual	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Strip Mall	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Enclosed Parking with Elevator	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Total	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005

4.3. Area Emissions by Source

4.3.1. Unmitigated

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

Source	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Consumer Products	0.87	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.07	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.26	0.02	2.65	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Total	1.20	0.02	2.65	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00

Consumer Products	0.87	—	—	—	—	—	—	—	—
Architectural Coatings	0.07	—	—	—	—	—	—	—	—
Total	0.94	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00
Consumer Products	0.16	—	—	—	—	—	—	—	—
Architectural Coatings	0.01	—	—	—	—	—	—	—	—
Landscape Equipment	0.03	< 0.005	0.33	< 0.005	< 0.005	—	< 0.005	< 0.005	< 0.005
Total	0.20	< 0.005	0.33	< 0.005	< 0.005	—	< 0.005	< 0.005	< 0.005

4.3.2. Mitigated

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

Source	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Consumer Products	0.87	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.07	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.26	0.02	2.65	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Total	1.20	0.02	2.65	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00

Consumer Products	0.87	—	—	—	—	—	—	—	—
Architectural Coatings	0.07	—	—	—	—	—	—	—	—
Total	0.94	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Annual	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Consumer Products	0.16	—	—	—	—	—	—	—	—
Architectural Coatings	0.01	—	—	—	—	—	—	—	—
Landscape Equipment	0.03	< 0.005	0.33	< 0.005	< 0.005	—	< 0.005	—	< 0.005
Total	0.20	< 0.005	0.33	< 0.005	< 0.005	—	< 0.005	—	< 0.005

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)										
Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—

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

4.4.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)										
Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—

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

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)										
Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—

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

4.5.2. Mitigated

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

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

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

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

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

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

Apartments Mid Rise	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—

4.6.2. Mitigated

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

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

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

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

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

4.7.2. Mitigated

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

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

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

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

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

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

4.8.2. Mitigated

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

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

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

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

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

Total	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—

4.9.2. Mitigated

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

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

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

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

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

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

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)										
Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)										
Species	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—

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

4.10.4. Soil Carbon Accumulation By Vegetation Type - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)										
Vegetation	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

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

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

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

4.10.6. Avoided and Sequestered Emissions by Species - Mitigated

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

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

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

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Demolition	Demolition	1/1/2026	1/31/2026	5.00	22.0	—
Grading	Grading	2/1/2026	2/28/2026	5.00	20.0	—
Building Construction	Building Construction	4/1/2026	12/31/2027	5.00	458	—
Architectural Coating	Architectural Coating	7/1/2027	12/31/2027	5.00	132	—
Trenching	Trenching	3/1/2026	3/31/2026	5.00	22.0	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Tractors/Loaders/Backhoes	Diesel	Average	2.00	6.00	84.0	0.37

Demolition	Rubber Tired Dozers	Diesel	Average	1.00	1.00	367	0.40
Demolition	Concrete/Industrial Saws	Diesel	Average	1.00	8.00	33.0	0.73
Grading	Graders	Diesel	Average	1.00	6.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	6.00	367	0.40
Grading	Tractors/Loaders/Backhoes	Diesel	Average	1.00	7.00	84.0	0.37
Building Construction	Cranes	Diesel	Average	1.00	4.00	367	0.29
Building Construction	Forklifts	Diesel	Average	2.00	6.00	82.0	0.20
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	2.00	8.00	84.0	0.37
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48
Trenching	Trenchers	Diesel	Average	1.00	8.00	40.0	0.50

5.2.2. Mitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Tractors/Loaders/Backhoes	Diesel	Average	2.00	6.00	84.0	0.37
Demolition	Rubber Tired Dozers	Diesel	Average	1.00	1.00	367	0.40
Demolition	Concrete/Industrial Saws	Diesel	Average	1.00	8.00	33.0	0.73
Grading	Graders	Diesel	Average	1.00	6.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	6.00	367	0.40
Grading	Tractors/Loaders/Backhoes	Diesel	Average	1.00	7.00	84.0	0.37
Building Construction	Cranes	Diesel	Average	1.00	4.00	367	0.29
Building Construction	Forklifts	Diesel	Average	2.00	6.00	82.0	0.20
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	2.00	8.00	84.0	0.37
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48

Trenching	Trenchers	Diesel	Average	1.00	8.00	40.0	0.50
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5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	—	—	—	—
Demolition	Worker	10.0	18.5	LDA,LDT1 ,LDT2
Demolition	Vendor	—	10.2	HHDT,MHDT
Demolition	Hauling	4.27	20.0	HHDT
Demolition	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	7.50	18.5	LDA,LDT1 ,LDT2
Grading	Vendor	—	10.2	HHDT,MHDT
Grading	Hauling	0.00	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	32.2	18.5	LDA,LDT1 ,LDT2
Building Construction	Vendor	5.68	10.2	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	6.44	18.5	LDA,LDT1 ,LDT2
Architectural Coating	Vendor	—	10.2	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT
Trenching	—	—	—	—

Trenching	Worker	2.50	18.5	LDA,LDT1,LDT2
Trenching	Vendor	—	10.2	HHDT,MHDT
Trenching	Hauling	0.00	20.0	HHDT
Trenching	Onsite truck	—	—	HHDT

5.3.2. Mitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	—	—	—	—
Demolition	Worker	10.0	18.5	LDA,LDT1,LDT2
Demolition	Vendor	—	10.2	HHDT,MHDT
Demolition	Hauling	4.27	20.0	HHDT
Demolition	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	7.50	18.5	LDA,LDT1,LDT2
Grading	Vendor	—	10.2	HHDT,MHDT
Grading	Hauling	0.00	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	32.2	18.5	LDA,LDT1,LDT2
Building Construction	Vendor	5.68	10.2	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	6.44	18.5	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	10.2	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

Trenching	—	—	—	—
Trenching	Worker	2.50	18.5	LDA,LDT1,LDT2
Trenching	Vendor	—	10.2	HHDT,MHDT
Trenching	Hauling	0.00	20.0	HHDT
Trenching	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	77,888	25,963	3,233	1,078	—

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (Ton of Debris)	Acres Paved (acres)
Demolition	0.00	0.00	0.00	373	—
Grading	—	—	15.0	0.00	—

5.6.2. Construction Earthmoving Control Strategies

Control Strategies Applied	Frequency (per day)	PM10 Reduction	PM2.5 Reduction
Water Exposed Area	2	61%	61%
Water Demolished Area	2	36%	36%

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Apartments Mid Rise	—	0%
Strip Mall	0.00	0%
Enclosed Parking with Elevator	0.00	100%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)					
Year	kWh per Year	CO2	CH4	N2O	
2026	0.00	690	0.05	0.01	
2027	0.00	690	0.05	0.01	

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 Mid Rise	218	196	164	75,503	1,765	1,593	1,327	612,254
Strip Mall	95.5	90.6	44.0	31,920	684	648	315	228,434
Enclosed Parking with Elevator	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

5.9.2. Mitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Apartments Mid Rise	104	93.6	78.0	36,000	841	759	633	291,928
Strip Mall	74.5	70.7	34.3	24,899	533	506	246	178,184

Enclosed Parking with Elevator	0.00	0.00	0.00	0.00	0.00	0.00	0.00
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5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

Hearth Type	Unmitigated (number)						
Apartments Mid Rise	-						
Wood Fireplaces	0						
Gas Fireplaces	0						
Propane Fireplaces	0						
Electric Fireplaces	0						
No Fireplaces	40						
Conventional Wood Stoves	0						
Catalytic Wood Stoves	0						
Non-Catalytic Wood Stoves	0						
Pellet Wood Stoves	0						

5.10.1.2. Mitigated

Hearth Type	Unmitigated (number)						
Apartments Mid Rise	-						
Wood Fireplaces	0						
Gas Fireplaces	0						
Propane Fireplaces	0						
Electric Fireplaces	0						
No Fireplaces	40						

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)
77887.575	25,963	3,233	1,078	—

5.10.3. Landscape Equipment

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

5.10.4. Landscape Equipment - Mitigated

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

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (KBTU/yr)					
Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (KBTU/yr)
Apartments Mid Rise	131,340	690	0.0489	0.0069	397,014
Strip Mall	21,456	690	0.0489	0.0069	10,612

Enclosed Parking with Elevator	23,625	690	0.0489	0.0069	0.00
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5.11.2. Mitigated

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

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Apartments Mid Rise	132,781	690	0.0489	0.0069	0.00
Strip Mall	21,456	690	0.0489	0.0069	10,612
Enclosed Parking with Elevator	23,625	690	0.0489	0.0069	0.00

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Apartments Mid Rise	1,490,952	15,907
Strip Mall	159,626	0.00
Enclosed Parking with Elevator	0.00	0.00

5.12.2. Mitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Apartments Mid Rise	1,490,952	15,907
Strip Mall	159,626	0.00
Enclosed Parking with Elevator	0.00	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
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Apartments Mid Rise	24.2	—
Strip Mall	2.26	—
Enclosed Parking with Elevator	0.00	—

5.13.2. Mitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Apartments Mid Rise	24.2	—
Strip Mall	2.26	—
Enclosed Parking with Elevator	0.00	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Apartments Mid Rise	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Apartments Mid Rise	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00
Strip Mall	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
Strip Mall	Stand-alone retail refrigerators and freezers	R-134a	1,430	0.04	1.00	0.00	1.00
Strip Mall	Walk-in refrigerators and freezers	R-404A	3,922	< 0.005	7.50	7.50	20.0

5.14.2. Mitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
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Apartments Mid Rise	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Apartments Mid Rise	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00
Strip Mall	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
Strip Mall	Stand-alone retail refrigerators and freezers	R-134a	1,430	0.04	1.00	0.00	1.00
Strip Mall	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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5.15.2. Mitigated

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

5.16.1. Emergency Generators and Fire Pumps

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

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

Equipment Type	Fuel Type
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5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres
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5.18.1.2. Mitigated

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

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
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5.18.1.2. Mitigated

Biomass Cover Type	Initial Acres	Final Acres
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5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)
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5.18.2.2. Mitigated

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

6.1. Climate Risk Summary

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

Climate Hazard	Result for Project Location		Unit
Temperature and Extreme Heat	7.38		annual days of extreme heat
Extreme Precipitation	6.85		annual days with precipitation above 20 mm
Sea Level Rise	—		meters of inundation depth
Wildfire	0.00		annual hectares burned

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

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

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

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

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	1	0	0	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	0	0	N/A
Wildfire	1	0	0	N/A

Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

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

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

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

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	1	1	1	2
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	1	1	2
Wildfire	1	1	1	2
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

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

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

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

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

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

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	55.4
AQ-PM	70.9
AQ-DPM	46.2
Drinking Water	92.5
Lead Risk Housing	81.2
Pesticides	0.00
Toxic Releases	74.5
Traffic	75.6
Effect Indicators	—
CleanUp Sites	17.1
Groundwater	70.4
Haz Waste Facilities/Generators	74.7
Impaired Water Bodies	0.00
Solid Waste	0.00
Sensitive Population	—
Asthma	28.0
Cardio-vascular	49.2
Low Birth Weights	36.7
Socioeconomic Factor Indicators	—
Education	25.1
Housing	57.4
Linguistic	39.8
Poverty	16.6

Unemployment	74.7
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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	71.01244707
Employed	79.81521879
Median HI	70.99961504
Education	—
Bachelor's or higher	82.80508148
High school enrollment	100
Preschool enrollment	73.87398948
Transportation	—
Auto Access	28.16630309
Active commuting	77.58244578
Social	—
2-parent households	95.29064545
Voting	2.322597203
Neighborhood	—
Alcohol availability	15.56525087
Park access	2.194276915
Retail density	87.97638907
Supermarket access	94.25125112
Tree canopy	48.63338894
Housing	—
Homeownership	51.85422815

Housing habitability	57.37200051
Low-inc homeowner severe housing cost burden	26.53663544
Low-inc renter severe housing cost burden	69.43410753
Uncrowded housing	72.73193892
Health Outcomes	—
Insured adults	92.73707173
Arthritis	43.8
Asthma ER Admissions	78.2
High Blood Pressure	54.9
Cancer (excluding skin)	12.2
Asthma	76.7
Coronary Heart Disease	43.7
Chronic Obstructive Pulmonary Disease	68.2
Diagnosed Diabetes	88.2
Life Expectancy at Birth	83.5
Cognitively Disabled	72.6
Physically Disabled	50.9
Heart Attack ER Admissions	63.3
Mental Health Not Good	80.9
Chronic Kidney Disease	73.0
Obesity	77.3
Pedestrian Injuries	19.6
Physical Health Not Good	79.7
Stroke	64.5
Health Risk Behaviors	—
Binge Drinking	13.6
Current Smoker	78.6

No Leisure Time for Physical Activity	92.5
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	28.6
Elderly	43.3
English Speaking	68.6
Foreign-born	34.1
Outdoor Workers	94.1
Climate Change Adaptive Capacity	—
Impervious Surface Cover	19.9
Traffic Density	87.6
Traffic Access	87.4
Other Indices	—
Hardship	22.1
Other Decision Support	—
2016 Voting	25.2

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	52.0
Healthy Places Index Score for Project Location (b)	70.0
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 Healthy 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	Project plans.
Construction: Construction Phases	—
Construction: Off-Road Equipment	—
Operations: Hearths	—



DOUGLASKIM+ASSOCIATES,LLC

MATES V TOXIC EMISSIONS OVERVIEW

About Air Toxics Cancer Risk

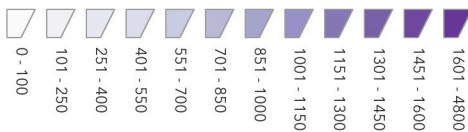
Information about community profile statistics
Information about emission sources
Download PDF

Residential Air Toxics Cancer Risk at
MATES Monitoring Sites



Residential Air Toxics Cancer Risk
Calculated from Model Data

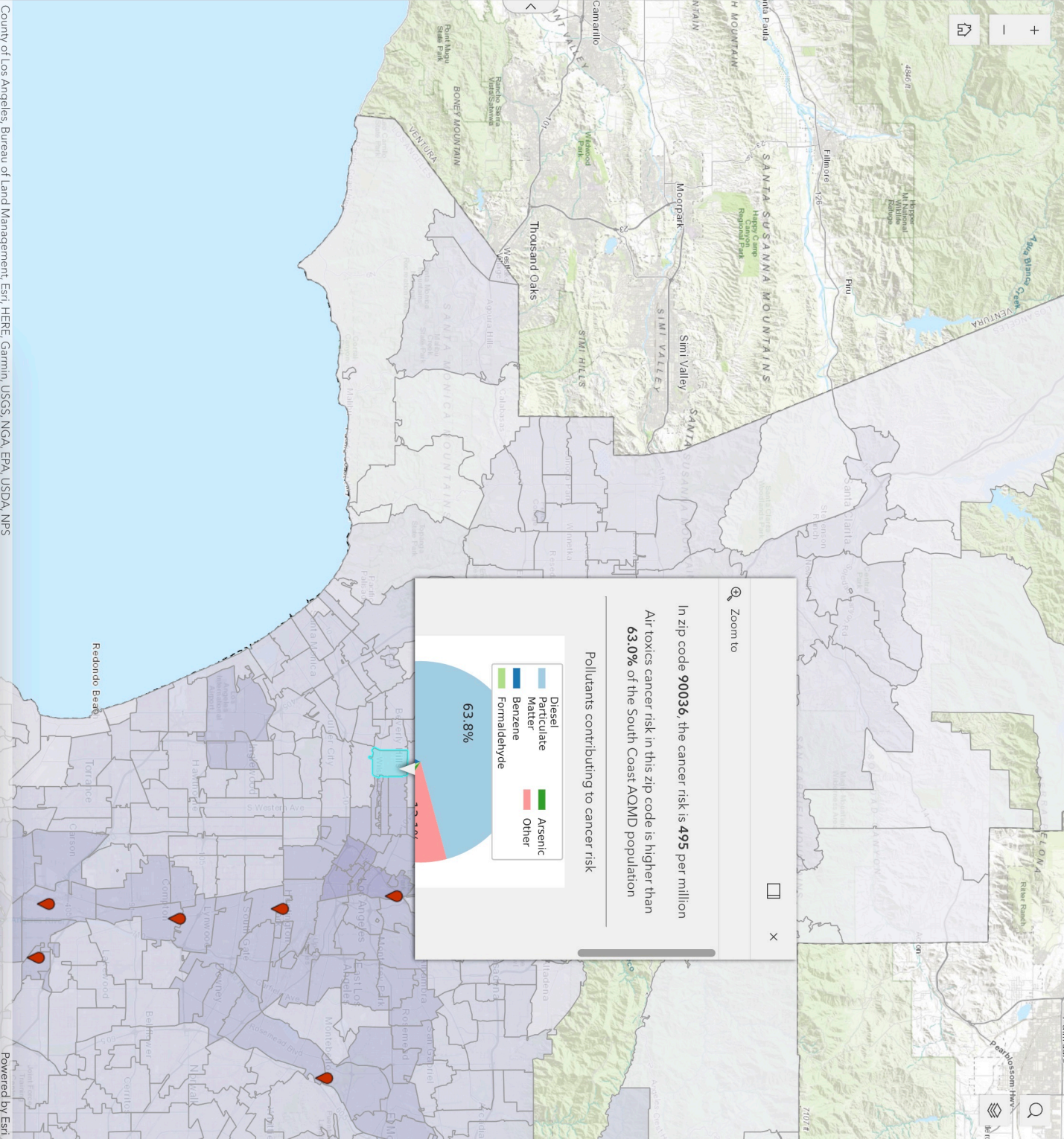
Cancer Risk [per million]



South Coast AQMD Boundary



The air toxics cancer risk data presented in the
MATES Data Visualization is calculated using a
population-weighted average.





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CALENVIROSCREEN 4.0 OUTPUT

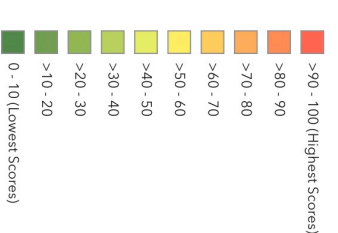
The CalEnviroScreen 4.0 tool shows cumulative impacts in California communities by census tract.

How to use this map

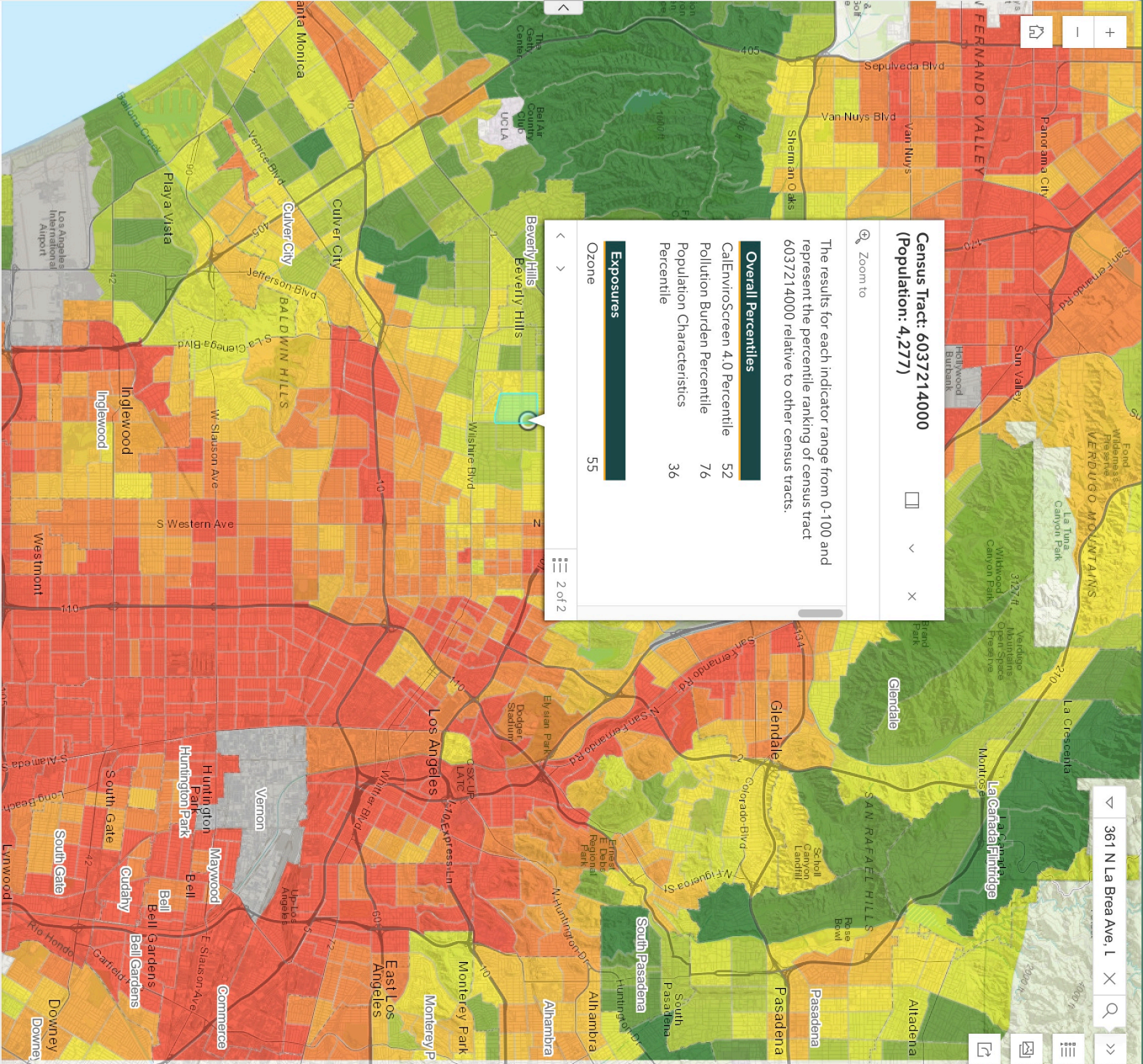
- Use your mouse or touchpad to pan around.
- Zoom in/out with a mouse wheel or the +/- icons.
- Search by location or census tract number with the search icon.
- Click on a census tract to view additional information in the pop-up window.
- Dock the pop-up window to the side of the screen by clicking the dock icon.
- Export a map view that includes the legend and popup using the screenshot widget.
- Learn more about CalEnviroScreen 4.0 and how this map was created [here](#)

Overall Percentile

CalEnviroScreen 4.0 Results



CalEnviroScreen 4.0 High Pollution, Low Population





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DEMOLITION ANALYSIS



Douglas Kim + Associates, LLC

CONSTRUCTION BUILDING DEBRIS

Materials	Total SF	Height	Cubic Yards	Pounds per Cub	Tons	Truck Capacity (CY)	Truck Trips	Source
Construction and Debris	0	0	-	484	-	10	-	Florida Department of Environmental Protection A Fact Sheet for C&D Debris Facility Operators <i>Federal Emergency Management Agency, Debris Estimating Field Guide (FEMA 329), September 2010. General Building Formula</i>
General Building	2,975	12	436	1,000	218	10	87	<i>Federal Emergency Management Agency, Debris Estimating Field Guide (FEMA 329), September 2010. Single Family Residence Formula, assumes 1 story, Medium vegetative cover multiplier (1.3)</i>
Single Family Residence	-	12	-	1,000	-	10	-	Florida Department of Environmental Protection A Fact Sheet for C&D Debris Facility Operators
Multi-Family Residence		12	-	1,000	-	10	-	
Mobile Home			-	1,000	-	10	-	
Mixed Debris			-	480	-	10	-	
Vegetative Debris (Hardwoods)			-	500	-	10	-	Florida Department of Environmental Protection A Fact Sheet for C&D Debris Facility Operators
Vegetative Debris (Softwoods)			-	333	-	10	-	
Asphalt or concrete (Construction)	6,950	0.5	129	2,400	154	10	26	
TOTAL			565		373		113	

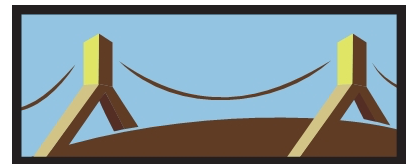
Exhibit B.2

Environmental Documents (ENV-2024-5978-CE)

Noise Report

361 NORTH LA BREA AVENUE PROJECT

Noise Technical Report



Prepared by DKA Planning
20445 Prospect Road, Suite C
San Jose, CA 95129
July 2024

NOISE TECHNICAL REPORT

Introduction

This technical report evaluates noise impacts from construction and operation of a Proposed Project at 381 North La Brea Avenue in the City of Los Angeles. The analysis discusses applicable regulations and compares impacts to appropriate thresholds of significance. Noise measurements, calculation worksheets, and a map of noise receptors and measurement locations are included in the Technical Appendix to this analysis.

Fundamentals of Noise

Characteristics of Sound

Sound can be described in terms of its loudness (amplitude) and frequency (pitch). The standard unit of measurement for sound is the decibel (dB). Because the human ear is not equally sensitive to sound at all frequencies, the A-weighted scale (dBA) is used to reflect the normal hearing sensitivity range. On this scale, the range of human hearing extends from 3 to 140 dBA. Table 1 provides examples of A-weighted noise levels from common sources.

Table 1
A-Weighted Decibel Scale

Typical A-Weighted Sound Levels	Sound Level (dBA L_{eq})
Near Jet Engine	130
Rock and Roll Band	110
Jet flyover at 1,000 feet	100
Power Motor	90
Food Blender	80
Living Room Music	70
Human Voice at 3 feet	60
Residential Air Conditioner at 50 feet	50
Bird Calls	40
Quiet Living Room	30
Average Whisper	20
Rustling Leaves	10
Source: Cowan, James P., Handbook of Environmental Acoustics, 1993. These noise levels are approximations intended for general reference and informational use.	

Noise Definitions. This noise analysis discusses sound levels in terms of equivalent noise level (L_{eq}), maximum noise level (L_{max}) and the Community Noise Equivalent Level (CNEL).

- **Equivalent Noise Level (L_{eq}):** L_{eq} represents the average noise level on an energy basis for a specific time period. Average noise level is based on the energy content (acoustic energy) of sound. For example, the L_{eq} for one hour is the energy average noise level during that hour. L_{eq} can be thought of as a continuous noise level of a certain period equivalent in energy content to a fluctuating noise level of that same period.

- Maximum Noise Level (L_{max}): L_{max} represents the maximum instantaneous noise level measured during a given time period.
- Community Noise Equivalent Level (CNEL): CNEL is an adjusted noise measurement scale of average sound level during a 24-hour period. Due to increased noise sensitivities during evening and night hours, human reaction to sound between 7:00 P.M. and 10:00 P.M. is as if it were actually 5 dBA higher than had it occurred between 7:00 A.M. and 7:00 P.M. From 10:00 P.M. to 7:00 A.M., humans perceive sound as if it were 10 dBA higher. To account for these sensitivities, CNEL figures are obtained by adding an additional 5 dBA to evening noise levels between 7:00 P.M. and 10:00 P.M. and 10 dBA to nighttime noise levels between 10:00 P.M. and 7:00 A.M. As such, 24-hour CNEL figures are always higher than their corresponding actual 24-hour averages.

Effects of Noise. The degree to which noise can impact an environment ranges from levels that interfere with speech and sleep to levels that can cause adverse health effects. Most human response to noise is subjective. Factors that influence individual responses include the intensity, frequency, and pattern of noise; the amount of background noise present; and the nature of work or human activity exposed to intruding noise. According to the National Institute of Health (NIH), extended or repeated exposure to sounds at or above 85 dB can cause hearing loss. Sounds of 70 dBA or less, even after continuous exposure, are unlikely to cause hearing loss.¹ The World Health Organization (WHO) reports that adults should not be exposed to sudden “impulse” noise events of 140 dB or greater. For children, this limit is 120 dB.²

Exposure to elevated nighttime noise levels can disrupt sleep, leading to increased levels of fatigue and decreased work or school performance. For the preservation of healthy sleeping environments, the WHO recommends that continuous interior noise levels not exceed 30 dBA and that individual noise events of 45 dBA or higher be avoided.³ Assuming a conservative exterior to interior sound reduction of 15 dBA, continuous exterior noise levels should therefore not exceed 45 dBA. Individual exterior events of 60 dBA or higher should also be limited. Some epidemiological studies have shown a weak association between long-term exposure to noise levels of 65 to 70 dBA and cardiovascular effects, including ischemic heart disease and hypertension. However, at this time, the relationship is largely inconclusive.

People with normal hearing sensitivity can recognize small changes in sound levels of approximately 3 dBA. Changes of at least 5 dBA can be readily noticeable while sound level increases of 10 dBA or greater are perceived as a doubling in loudness.⁴ However, during daytime, few people are highly annoyed by noise levels below 55 dBA L_{eq} .⁵

¹ National Institute of Health, National Institute on Deafness and Other Communication, www.nidcd.nih.gov/health/noise-induced-hearing-loss.

² World Health Organization, Guidelines for Community Noise, 1999.

³ Ibid.

⁴ Federal Transit Administration, Transit Noise and Vibration Impact Assessment, 2018.

⁵ World Health Organization, Guidelines for Community Noise, 1999.

Noise Attenuation. Noise levels decrease as the distance from noise sources to receivers increases. For each doubling of distance, noise from stationary sources can decrease by about 6 dBA over hard surfaces (e.g., reflective surfaces such as parking lots) and 7.5 dBA over soft surfaces (e.g., absorptive surfaces such as soft dirt and grass). For example, if a point source produces a noise level of 89 dBA at a reference distance of 50 feet over an asphalt surface, its noise level would be approximately 83 dBA at a distance of 100 feet, 77 dBA at 200 feet, etc. Noises generated by mobile sources such as roadways decrease by about 3 dBA over hard surfaces and 4.5 dBA over soft surfaces for each doubling of distance. It should be noted that because decibels are logarithmic units, they cannot be added or subtracted. For example, two cars each producing 60 dBA of noise would not produce a combined 120 dBA.

Noise is most audible when traveling by direct line of sight, an unobstructed visual path between noise source and receptor. Barriers that break line of sight between sources and receivers, such as walls and buildings, can greatly reduce source noise levels by allowing noise to reach receivers by diffraction only. As a result, sound barriers can generally reduce noise levels by up to 15 dBA.⁶ The effectiveness of barriers can be greatly reduced when they are not high or long enough to completely break line of sight from sources to receivers.

Regulatory Framework

Noise

Federal. No federal noise standards regulate environmental noise associated with short-term construction activities or long-term operations of development projects. As such, temporary and long-term noise impacts produced by the Project would be largely regulated or evaluated by State and City of Los Angeles standards designed to protect public well-being and health.

State. The State's 2017 General Plan Guidelines establish county and city standards for acceptable exterior noise levels based on land use. These standards are incorporated into land use planning processes to prevent or reduce noise and land use incompatibilities. Table 2 illustrates State compatibility considerations between land uses and exterior noise levels.

California Government Code Section 65302 also requires each county and city to prepare and adopt a comprehensive long-range general plan for its physical development. Section 65302(f) requires a noise element to be included in the general plan. This noise element must identify and appraise noise problems in the community, recognize State noise control guidelines, and analyze and quantify current and projected noise levels.

The State has also established noise insulation standards for new multi-family residential units, hotels, and motels that are subject to relatively high levels of noise from transportation. The noise insulation standards, collectively referred to as the California Noise Insulation Standards (Title 24, California Code of Regulations) set forth an interior standard of 45 dBA CNEL for habitable rooms.

⁶ California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013. <https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tens-sep2013-a11y.pdf>

The standards require an acoustical analysis which indicates that dwelling units meet this interior standard where such units are proposed in areas subject to exterior noise levels greater than 60 dBA CNEL. Local jurisdictions typically enforce the California Noise Insulation Standards through the building permit application process.

Los Angeles County Airport Land Use Commission Comprehensive Land Use Plan. In Los Angeles County, the Regional Planning Commission has the responsibility for acting as the Airport Land Use Commission and for coordinating the airport planning of public agencies within the County. The Airport Land Use Commission coordinates planning for the areas surrounding public use airports. The Comprehensive Land Use Plan provides for the orderly expansion of Los Angeles County's public use airports and the areas surrounding them. It is intended to provide for the adoption of land use measures that will minimize the public's exposure to excessive noise and safety hazards. In formulating the Comprehensive Land Use Plan, the Los Angeles County Airport Land Use Commission has established provisions for safety, noise insulation, and the regulation of building height within areas adjacent to each of the public airports in the County.

City of Los Angeles General Plan Noise Element. The City of Los Angeles General Plan includes a Noise Element that includes policies and standards to guide the control of noise to protect residents, workers, and visitors. Its primary goal is to regulate long-term noise impacts to preserve acceptable noise environments for all types of land uses. It includes programs applicable to construction projects that call for protection of noise sensitive uses and use of best practices to minimize short-term noise impacts.⁷ However, the Noise Element contains no quantitative or other thresholds of significance for evaluating a project's noise impacts. Instead, it adopts the State's guidance on noise and land use compatibility, shown in Table 2, "to help guide determination of appropriate land use and mitigation measures vis-à-vis existing or anticipated ambient noise levels." It also includes a policy and an objective that are relevant for the Proposed Project:

Policy 2.2: Enforce and/or implement applicable city, state, and federal regulations intended to mitigate proposed noise producing activities, reduce intrusive noise and alleviate noise that is deemed a public nuisance.

Objective 3 (Land Use Development): Reduce or eliminate noise impacts associated with proposed development of land and changes in land use.

There are also two programs that are applicable to development projects:

Program 11: For a proposed development project that is deemed to have a potentially significant noise impact on noise sensitive uses, as defined by this chapter, require mitigation measures, as appropriate, in accordance with California Environmental Quality Act and city procedures.

⁷ The L.A. CEQA Thresholds Guide defined noise sensitive uses as residences, transient lodgings, schools, libraries, churches, hospitals, nursing homes, auditoriums, concert halls, amphitheaters, playgrounds, and parks.

Table 2
State of California Noise/Land Use Compatibility Matrix

Land Use Category	Community Noise Exposure (dB, L _{dn} or CNEL)					
	55	60	65	70	75	80
Residential - Low Density Single-Family, Duplex, Mobile Homes						
Residential - Multi-Family						
Transient Lodging - Motels Hotels						
Schools, Libraries, Churches, Hospitals, Nursing Homes						
Auditoriums, Concert Halls, Amphitheaters						
Sports Arena, Outdoor Spectator Sports						
Playgrounds, Neighborhood Parks						
Golf Courses, Riding Stables, Water Recreation, Cemeteries						
Office Buildings, Business Commercial and Professional						
Industrial, Manufacturing, Utilities, Agriculture						
<div> <div></div> Normally Acceptable - Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements. </div> <div> <div></div> Conditionally Acceptable - New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply system or air conditioning will normally suffice. </div> <div> <div></div> Normally Unacceptable - New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design. </div> <div> <div></div> Clearly Unacceptable - New construction or development should generally not be undertaken. </div>						
Source: California Office of Planning and Research "General Plan Guidelines, Noise Element Guidelines (Appendix D, Figure 2), 2017.						

Program 12: When issuing discretionary permits for a proposed noise-sensitive use (as defined by this chapter) or a subdivision of four or more detached single-family units and which use is determined to be potentially significantly impacted by existing or proposed noise sources, require mitigation measures, as appropriate, in accordance with procedures set forth in the California Environmental Quality Act so as to achieve an interior noise level of a CNEL of 45 dB, or less, in any habitable room, as required by Los Angeles Municipal Code Section 91.

City of Los Angeles Municipal Code. The City of Los Angeles Municipal Code (LAMC) contains regulations that would regulate noise from the Project's temporary construction activities. Section 41.40(a) would prohibit construction activities between 9:00 P.M. and 7:00 A.M., Monday through Friday. Subdivision (c) would further prohibit such activities from occurring before 8:00 A.M. or after 6:00 P.M. on any Saturday or national holiday, or at any time on any Sunday. These restrictions serve to limit specific Project construction activities to Monday through Friday 7:00 A.M. to 9:00 P.M., and 8:00 A.M. to 6:00 P.M. on Saturdays or national holidays.

SEC.41.40. NOISE DUE TO CONSTRUCTION, EXCAVATION WORK—WHEN PROHIBITED.

(a) No person shall, between the hours of 9:00 P.M. and 7:00 A.M. of the following day, perform any construction or repair work of any kind upon, or any excavating for, any building or structure, where any of the foregoing entails the use of any power drive drill, riveting machine excavator or any other machine, tool, device or equipment which makes loud noises to the disturbance of persons occupying sleeping quarters in any dwelling, hotel or apartment or other place of residence. In addition, the operation, repair or servicing of construction equipment and the job-site delivering of construction materials in such areas shall be prohibited during the hours herein specified. Any person who knowingly and willfully violates the foregoing provision shall be deemed guilty of a misdemeanor punishable as elsewhere provided in this Code.

(c) No person, other than an individual homeowner engaged in the repair or construction of his single-family dwelling shall perform any construction or repair work of any kind upon, or any earth grading for, any building or structure located on land developed with residential buildings under the provisions of Chapter I of this Code, or perform such work within 500 feet of land so occupied, before 8:00 A.M. or after 6:00 P.M. on any Saturday or national holiday nor at any time on any Sunday. In addition, the operation, repair, or servicing of construction equipment and the job-site delivering of construction materials in such areas shall be prohibited on Saturdays and on Sundays during the hours herein specific...

Section 112.04 of the LAMC bans the use of gas-powered leaf blowers within 500 feet of a residence between 10:00 P.M. and 7:00 A.M. This also includes lawn mowers, lawn edgers, riding tractors, or other equipment that makes loud sounds.

Section 112.05 of the LAMC establishes noise limits for powered equipment and hand tools operated in a residential zone or within 500 feet of any residential zone. Of particular importance to construction activities is subdivision (a), which institutes a maximum noise limit of 75 dBA as

measured at a distance of 50 feet from the activity for the types of construction vehicles and equipment that would likely be used in the construction of the Project. However, the LAMC notes that these limitations would not necessarily apply if it can be proven that the Project's compliance would be technically infeasible despite the use of noise-reducing means or methods.

SEC. 112.05. MAXIMUM NOISE LEVEL OF POWERED EQUIPMENT OR POWERED HAND TOOLS

Between the hours of 7:00 A.M. and 10:00 P.M., in any residential zone of the City or within 500 feet thereof, no person shall operate or cause to be operated any powered equipment or powered hand tool that produces a maximum noise level exceeding the following noise limits at a distance of 50 feet therefrom:

- (a) 75 dBA for construction, industrial, and agricultural machinery including crawler-tractors, dozers, rotary drills and augers, loaders, power shovels, cranes, derricks, motor graders, paving machines, off-highway trucks, ditchers, trenchers, compactors, scrapers, wagons, pavement breakers, compressors and pneumatic or other powered equipment;*
- (b) 75 dBA for powered equipment of 20 HP or less intended for infrequent use in residential areas, including chain saws, log chippers and powered hand tools;*
- (c) 65 dBA for powered equipment intended for repetitive use in residential areas, including lawn mowers, backpack blowers, small lawn and garden tools and riding tractors.*

Said noise limitations shall not apply where compliance therewith is technically infeasible. The burden of proving that compliance is technically infeasible shall be upon the person or persons charged with a violation of this section. Technical infeasibility shall mean that said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers and/or other noise reduction device or techniques during the operation of the equipment.

In addition, the LAMC regulates long-term operations of land uses. This includes Section 111.02, which discusses the measurement procedure and criteria regarding the sound level of "offending" noise sources. A noise source causing a 5 dBA increase over the existing average ambient noise levels of an adjacent property is considered to create a noise violation. However, Section 111.02(b) provides a 5 dBA allowance for noise sources lasting more than five but less than 15 minutes in any 1-hour period, and a 10 dBA allowance for noise sources causing noise lasting 5 minutes or less in any 1-hour period. In accordance with these regulations, a noise level increase from certain city-regulated noise sources of five dBA over the existing or presumed ambient noise level at an adjacent property is considered a violation.

Section 112.01 of the LAMC prohibits any amplified noises, especially those from outdoor sources (e.g., outdoor speakers, stereo systems) from exceeding the ambient noise levels of adjacent properties by more than 5 dBA. Any amplified noises would also be prohibited from being audible at any distance greater than 150 feet from the Project's property line, as the Project is located within 500 feet of residential zones.

SEC.112.01. RADIOS, TELEVISION SETS, AND SIMILAR DEVICES

(a) *It shall be unlawful for any person within any zone of the City to use or operate any radio, musical instrument, phonograph, television receiver, or other machine or device for the producing, reproducing or amplification of the human voice, music, or any other sound, in such a manner, as to disturb the peace, quiet, and comfort of neighbor occupants or any reasonable person residing or working in the area.*

(b) *Any noise level caused by such use or operation which is audible to the human ear at a distance in excess of 150 feet from the property line of the noise source, within any residential zone of the City or within 500 feet thereof, shall be a violation of the provisions of this section.*

(c) *Any noise level caused by such use or operation which exceeds the ambient noise level on the premises of any other occupied property, or if a condominium, apartment house, duplex, or attached business, within any adjoining unit, by more than five (5) decibels shall be a violation of the provisions of this section.*

Section 112.02 prevents Project heating, ventilation, and air conditioning (HVAC) systems and other mechanical equipment from elevating ambient noise levels by more than 5 dBA.

SEC.112.02. AIR CONDITIONING, REFRIGERATION, HEATING, PLUMBING, FILTERING EQUIPMENT

(a) *It shall be unlawful for any person, within any zone of the city, to operate any air conditioning, refrigeration or heating equipment for any residence or other structure or to operate any pumping, filtering or heating equipment for any pool or reservoir in such manner as to create any noise which would cause the noise level on the premises of any other occupied property ... to exceed the ambient noise level by more than five decibels.*

The LAMC also regulates vehicle-related noise. Section 114.02 prohibits the operation of any motor driven vehicles upon any property within the City in a manner that would cause the noise level on the premises of any occupied residential property to elevate ambient noise levels by more than 5 dBA. Section 114.03 prohibits loading and unloading causing any impulsive sound, raucous or unnecessary noise within 200 feet of any residential building between the hours of 10:00 P.M. and 7:00 A.M. Section 114.06 requires vehicle theft alarm systems to be silenced within five minutes.

Existing Conditions

Noise Sensitive Receptors

The Project Site is located along the largely commercial zone of La Brea Avenue in the Hancock Park neighborhood. Noise-sensitive receptors within 0.25 miles of the Project Site include, but are not limited to, the following representative sampling:

- Residences, Detroit St (300 block); residences as close as 30 feet west of the Project Site.

- Residences, Detroit St (400 block); residences as close as 90 ft northwest of the Project Site.
- Residences, Sycamore Avenue; 230 feet east of the Project Site.

Existing Ambient Noise Levels

The Project Site is improved with a 2,975 square-foot commercial building and 6,950 square-foot surface parking lot.⁸ There are minor sources of operational noise, including intermittent noise from the operation of the parking lot, including tire friction as vehicles navigate to and from parking spaces, minor engine acceleration, doors slamming, and occasional car alarms. Most of these sources are instantaneous (e.g., car alarm chirp, door slam) while others may last a few seconds. There is also infrequent noise from occasional solid waste management and collection activities as well as landscaping activities that are of short duration, as is occasional loading of goods that must comply with LAMC Section 114.03, as the Project Site is within 200 feet of residences.

Traffic is the primary source of noise near the Project Site, largely from the operation of vehicles with internal combustion engines and frictional contact with the ground and air.⁹ This includes traffic on La Brea Avenue, which carries about 3,995 vehicles at Oakwood Avenue in the A.M. peak hour.¹⁰

As shown in Table 3, noise levels along roadways near the Project Site ranged from 56.4 to 62.3 dBA L_{eq} , which was generally consistent with the traffic volumes on local streets. 24-hour CNEL noise levels are generally considered “Normally Acceptable” and “Conditionally Acceptable” for the types of land uses near the Project Site.

Table 3
Existing Noise Levels

Sensitive Receptor	Primary Noise Source	Sound Levels		Noise/Land Use Compatibility ^b
		dBA (L_{eq})	dBA (CNEL) ^a	
1. Residences – Detroit St. (300 block)	Traffic in alley	57.8	55.8	Normally Acceptable
2. Residences – Detroit St. (400 block).	Traffic on Overland Ave.	62.3	60.3	Conditionally Acceptable
3. Residences – Sycamore Ave.	Traffic in alley	56.4	54.4	Normally Acceptable
^a SoundPLAN Essential, v. 5.1 using SoundPLAN Essential v5.1 and City of Los Angeles Manual Traffic Count Summary for La Brea Avenue at Oakwood Avenue (https://navigatela.lacity.org/dot/traffic_data/manual_counts/13171_LABOAK93.pdf) Source: DKA Planning, 2024				

⁸ City of Los Angeles, ZIMAS database, accessed June 29, 2024.

⁹ World Health Organization, <https://www.who.int/docstore/peh/noise/Comnoise-2.pdf> accessed March 18, 2021.

¹⁰ DKA Planning, 2024, based on City of Los Angeles database of traffic volumes on La Brea Avenue at Oakwood Avenue, https://navigatela.lacity.org/dot/traffic_data/manual_counts/13171_LABOAK93.pdf; traffic counts adjusted by one percent growth factor to represent existing conditions.

Project Impacts

Methodology

On-Site Construction Activities. Construction noise levels at off-site sensitive receptors were modeled employing the ISO 9613-2 sound attenuation methodologies using the SoundPLAN Essential model (version 5.1). This software package considers reference equipment noise levels, maximum allowable noise levels allowed by the LAMC, noise management techniques, distance to receptors, and any attenuating features to predict noise levels from sources like construction equipment. Construction noise sources were modeled as area sources to reflect the mobile nature of construction equipment. These vehicles would not operate directly where the Project's property line abuts adjacent structures, as they would retain some setback to preserve maneuverability. This equipment would also occasionally operate at reduced power and intensity to maintain precision at these locations.

Off-Site Construction Noise Activities. The Project's off-site construction noise impact from haul trucks, vendor deliveries, worker commutes, and other vehicles accessing the Project Site was analyzed by considering the Project's anticipated vehicle trip generation with existing traffic and roadway noise levels along local roadways, particularly those likely to be part of any haul route. Because it takes a doubling of traffic volumes on a roadway to generate the increased sound energy it takes to elevate ambient noise levels by 3 dBA,¹¹ the analysis focused on whether truck and auto traffic would double traffic volumes on key roadways to be used for hauling soils to and/or from the Project Site during construction activities.¹² Because haul trucks generate more noise than traditional passenger vehicles, a 19.1 passenger car equivalency (PCE) was used to convert haul truck trips to a reference level conversion to an equivalent number of passenger vehicles.¹³ For vendor deliveries, a 13.1 PCE was used to reflect an even blend of medium- and heavy-duty vehicles.¹⁴ It should be noted that because an approved haul route may not be approved as of the preparation of this analysis, assumptions were made about logical routes that would minimize haul truck traffic on local streets in favor of major arterials that can access regional-serving freeways.

On-Site Operational Noise Activities. The Project's potential to result in significant noise impacts from on-site operational noise sources was evaluated by identifying sources of on-site noise and considering the impact that they could produce given the nature of the source (i.e., loudness and whether noise would be produced during daytime or more-sensitive nighttime hours), distances

¹¹ Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018.

¹² A tripling of traffic volumes (i.e., 3.15x) is needed to elevate traffic noise levels by 5 dBA.

¹³ Caltrans, Technical Noise Supplement Table 3-3, 2013. Assumes 35 mph speed. While trucks traveling at higher speeds would have lower equivalency values (e.g., PCE is 15.1 at 40 mph), this analysis assumes a posted speed limit typical of major arterials (35 mph). While these equivalent vehicle factors do not consider source heights, Caltrans' factors are appropriate for use, as the local roads used by haul trucks would not involve a sound path where noise levels are intercepted by a barrier or natural terrain feature.

¹⁴ Caltrans, Technical Noise Supplement Table 3-3, 2013. Medium-duty trucks have a 7.1 PCE at 35 mph.

to nearby sensitive receptors, ambient noise levels near the Project Site, the presence of similar noise sources in the vicinity, and maximum noise levels permitted by the LAMC.

Off-Site Operational Noise Activities. The Project's off-site noise impact from Project-related traffic was evaluated based its potential to increase traffic volumes on local roadways that serve the Project site. Because it takes a doubling of traffic volumes on a roadway to generate the increased sound energy it takes to elevate ambient noise levels by 3 dBA, the analysis focused on whether auto trips generated by the Proposed Project would double traffic volumes on key roadways that access the Project Site.

Thresholds of Significance

Construction Noise Thresholds. Based on guidelines from the City of Los Angeles City Department of Planning, the on-site construction noise impact would be considered significant if:

- Construction activities lasting more than one day would exceed existing ambient exterior sound levels by 10 dBA (hourly L_{eq}) or more at a noise-sensitive use;
- Construction activities lasting more than 10 days in a three-month period would exceed existing ambient exterior noise levels by 5 dBA (hourly L_{eq}) or more at a noise-sensitive use; or
- Construction activities of any duration would exceed the ambient noise level by 5 dBA (hourly L_{eq}) at a noise-sensitive use between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, before 8:00 A.M. or after 6:00 P.M. on Saturday, or at any time on Sunday.

Operational Noise Thresholds. In addition to applicable City standards and guidelines that would regulate or otherwise moderate the Project's operational noise impacts, the following criteria are adopted to assess the impact of the Project's operational noise sources:

- Project operations would cause ambient noise levels at off-site locations to increase by 3 dBA CNEL or more to or within "normally unacceptable" or "clearly unacceptable" noise/land use compatibility categories, as defined by the State's 2017 General Plan Guidelines.
- Project operations would cause any 5 dBA CNEL or greater noise increase.¹⁵

¹⁵ As a 3 dBA increase represents a slightly noticeable change in noise level, this threshold considers any increase in ambient noise levels to or within a land use's "normally unacceptable" or "clearly unacceptable" noise/land use compatibility categories to be significant so long as the noise level increase can be considered barely perceptible. In instances where the noise level increase would not necessarily result in "normally unacceptable" or "clearly unacceptable" noise/land use compatibility, a 5 dBA increase is still considered to be significant. Increases less than 3 dBA are unlikely to result in noticeably louder ambient noise conditions and would therefore be considered less than significant.

Analysis of Project Impacts

- a. **Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

Less Than Significant Impact.

Construction

On-Site Construction Activities

Construction would generate noise during the construction process that would span 24 months of demolition, grading, utilities trenching, building construction, and application of architectural coatings, as shown in Table 4. During all construction phases, noise-generating activities could occur at the Project Site between 7:00 A.M. and 9:00 P.M. Monday through Friday, in accordance with LAMC Section 41.40(a). On Saturdays, construction would be permitted to occur between 8:00 A.M. and 6:00 P.M.

Table 4
Construction Schedule Assumptions

Phase	Duration	Notes
Demolition	Month 1	Removal of 2,975 square-foot commercial building and 6,950 square feet of asphalt/concrete parking lot hauled 30 miles to landfill in 10-cubic yard capacity trucks.
Grading	Month 2	Fine grading for balanced grading plan. Includes drilling of piles and shoring of excavated site.
Trenching	Month 3	Trenching for utilities, including gas, water, electricity, and telecommunications.
Building Construction	Months 4-24	Footings and foundation work, framing, welding; installing mechanical, electrical, and plumbing. Floor assembly, cabinetry and carpentry, elevator installations, low voltage systems, trash management.
Architectural Coatings	Months 19-24	Application of interior and exterior coatings and sealants.
Source: DKA Planning, 2024.		

Noise levels would generally peak during the demolition and grading phases, when diesel-fueled heavy-duty equipment like excavators and dozers are used to move large amounts of debris and dirt, respectively. This equipment is mobile in nature and does not always operate at in a steady-state mode full load, but rather powers up and down depending on the duty cycle needed to conduct work. As such, equipment is occasionally idle during which time no noise is generated.

During other phases of construction (e.g., trenching, building construction, architectural coatings), noise impacts are generally lesser because they are less reliant on using heavy equipment with

internal combustion engines. Smaller equipment such as forklifts, generators, and various powered hand tools and pneumatic equipment would often be utilized. Off-site secondary noises would be generated by construction worker vehicles, vendor deliveries, and haul trucks. Figure 2 illustrates how noise would propagate from the construction site during the demolition and grading phase.

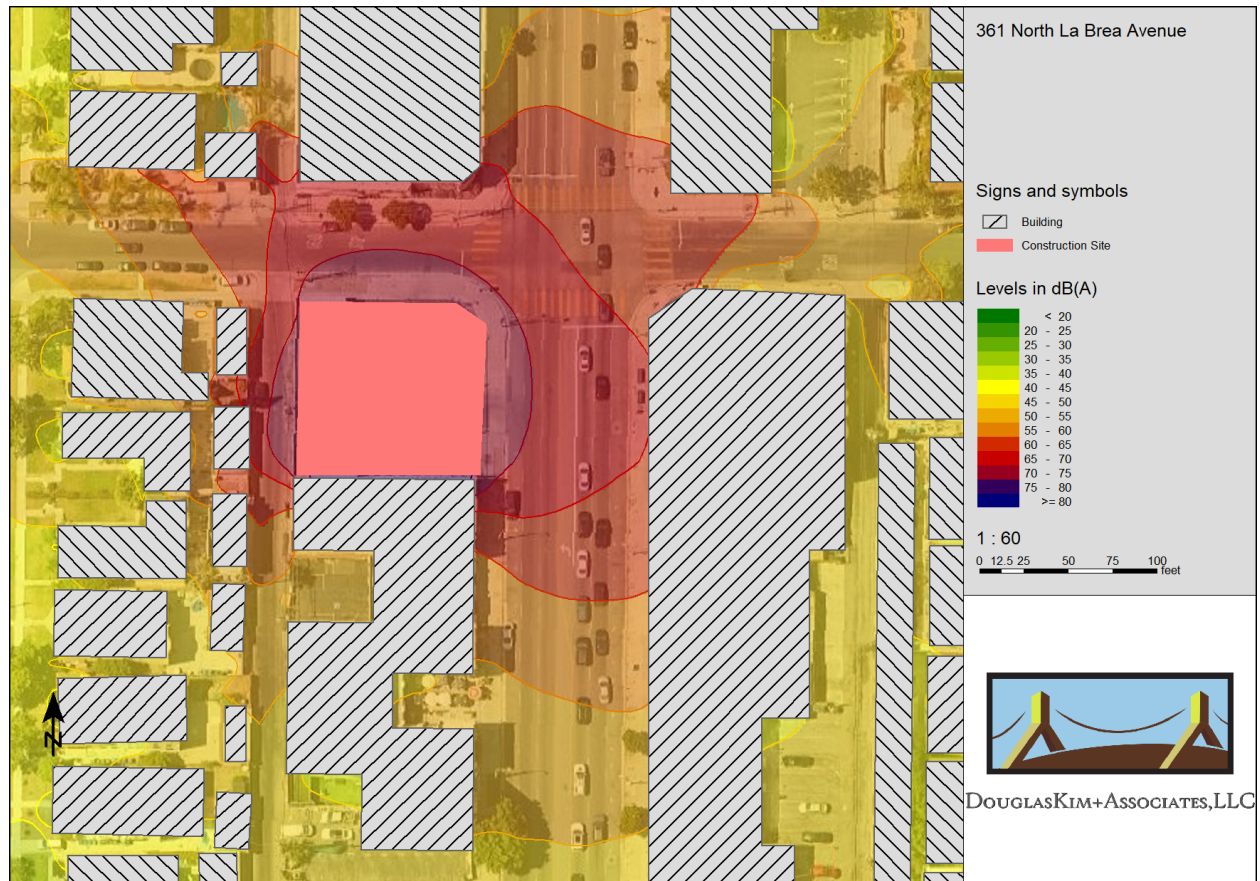


Figure 2
Construction Noise Sound Contours

Because the Project's construction phase would occur for more than three months, the applicable City threshold of significance for the Project's construction noise impacts is an increase of 5 dBA over existing ambient noise levels. As shown in Table 5, when considering ambient noise levels and compliance with LAMC Section 112.05, the use of multiple pieces of powered equipment simultaneously would increase ambient noise negligibly. This assumes the use of best practices techniques required by the City's Building and Safety code to meet these requirements, such as temporary sound barriers along the north and east property lines adjacent to neighboring residences that would generally reduce noise impacts at sensitive receptors by about 10 dBA L_{eq} . It also assumes the use of quieter equipment or advanced mufflers.¹⁶ These construction noise

¹⁶ Use of quieter equipment, such as electronic-powered equipment, is quieter than diesel-powered equipment. Similarly, hydraulically-powered equipment is quieter than pneumatic power. Overall, newer

levels would not exceed the City's significance threshold of 5 dBA. Therefore, the Project's on-site construction noise impact would be less than significant.

Table 5
Construction Noise Impacts at Off-Site Sensitive Receptors

Receptor	Maximum Construction Noise Level (dBA L _{eq})	Existing Ambient Noise Level (dBA L _{eq})	New Ambient Noise Level (dBA L _{eq})	Increase (dBA L _{eq})	Potentially Significant?
1. Residences – Detroit St. (300 block)	60.7	57.8	62.5	4.7	No
2. Residences – Detroit St. (400 block).	59.9	62.3	64.3	2.0	No
3. Residences – Sycamore Ave.	49.2	56.4	57.2	0.8	No
Source: DKA Planning, 2024.					

Off-Site Construction Activities

The Project would also generate noise at off-site locations from haul trucks moving debris and soil from the Project Site during demolition and grading activities, respectively; vendor trips; and worker commute trips. These activities would generate up to an estimated 53 peak hourly PCE trips, as summarized in Table 6, during the building construction phase.¹⁷ This would represent about 1.3 percent of traffic volumes on La Brea Avenue, which carries about 3,995 vehicles at Oakwood Avenue in the morning peak hour of traffic.¹⁸ Because workers and vendors will likely use more than one route to travel to and from the Project Site, this conservative assessment of traffic volumes likely overstates traffic volumes from construction activities on this roadway link.

Because the Project's construction-related trips would not cause a doubling in traffic volumes (i.e., 100 percent increase) on La Brea Avenue, the Project's construction-related traffic would not increase existing noise levels by 3 dBA or more, let alone the 5 dBA threshold of significance for off-site construction noise activities. Therefore, the Project's noise impacts from construction-related traffic would be less than significant.

equipment is generally quieter due to design improvements (e.g., tighter manufacturing tolerances, better gear meshing, quieter cooling fans). Deploying newer equipment also avoids unnecessary noise from poor maintenance (e.g., worn gear teeth or bearings, slackness between loose parts, poor lubrication, imbalance in rotating parts, obstructing in airways, damaged silencers).

¹⁷ This is a conservative, worst-case scenario, as it assumes all workers travel to the worksite at the same time and that vendor and haul trips are made in the same early hour, using the same route as haul trucks to travel to and from the Project Site.

¹⁸ DKA Planning, 2024, based on City of Los Angeles database of traffic volumes on La Brea Avenue at Oakwood Avenue, https://navigatela.lacity.org/dot/traffic_data/manual_counts/13171_LABOAK93.pdf; traffic counts adjusted by one percent growth factor to represent existing conditions.

Table 6
Construction Vehicle Trips (Maximum Hourly)

Construction Phase	Worker Trips ^a	Vendor Trips	Haul Trips	Total Trips	Percent of Peak A.M. Hour Trips on La Brea Ave. ^e
Demolition	10	0	11 ^b	21	0.5
Grading	8	0	0	8	0.2
Trenching	3	0	0	3	0.1
Building Construction	32	21 ^c	0	53	1.3
Architectural Coating	6	0	0	6	0.2
^a Assumes all worker trips occur in the peak hour of construction activity. ^b The project would generate 87 haul trips over a 22-day period with seven-hour work days. Because haul trucks emit more noise than passenger vehicles, a 19.1 passenger car equivalency (PCE) was used to convert haul truck trips to a passenger car equivalent ^c This phase would generate about 5.7 vendor truck trips daily over a seven-hour work day. Assumes a blend of medium- and heavy-duty vehicle types and a 13.1 PCE. ^d Percent of existing traffic volumes on La Brea Avenue at Oakwood Avenue. Source: DKA Planning, 2024					

Operation

On-Site Operational Noise

During long-term operations, the Project would produce noise from on-site sources such as mechanical equipment associated with the structures themselves or from activity in outdoor spaces.

Mechanical Equipment

The Project would operate mechanical equipment on the roof 68 feet above grade that would generate incremental long-term noise impacts. This would include the use of typical HVAC equipment for cooling or heat pumps for cooling and heating for multi-family residences (e.g., 2.5-ton Carrier 24ABC630A003 Carrier 25HBC5), with each unit distributed across the roof as needed to serve each residence. Similar units would be installed for the commercial tenant(s). Noise from heat pumps and air conditioners is a function of the model, airflow, and pressure flow generated by fans and compressors. Most modern heat pumps are relatively quiet, with sound ratings of up

to 60 decibels, equivalent to normal human conversation,¹⁹ while other HVAC units could have a sound power of up to 76 dBA.

However, noise impacts from rooftop mechanical equipment on nearby sensitive receptors would be negligible for several reasons. First, there would be no line-of-sight from these rooftop units to the sensitive receptors, as the residences adjacent to the Project Site are one- to two-stories in height, approximately 45 to 55 feet lower than the roof of the Proposed Project. As blocking the line of sight to a noise source generally results in a 5 decibel reduction, each rooftop unit could generate about 50.3 dBA at ten feet of distance.²⁰ Second, the presence of the Project's roof edge creates an effective noise barrier that further reduces noise levels from rooftop units by 8 dBA or more.²¹ A parapet would further shield sensitive receptors near the Project Site. These design elements would be helpful in managing noise, as equipment often operates continuously throughout the day and occasionally during the day, evenings, and weekends. Compliance with LAMC Section 112.02 would further limit the impact of HVAC equipment on noise levels at adjacent properties. As a result, noise from rooftop units would negligibly elevate ambient noise levels, far less than the 5 dBA CNEL threshold of significance for operational impacts.

A pad-mounted oil transformer that lowers high voltage to standard household voltage used to power electronics, appliances and lighting would be located on the ground level in an unobstructed location fronting on Oakwood Avenue. This transformer would be housed in a steel cabinet and generally would not involve pumps, though fans may be needed on some units. Switchgear responsible for distributing power through the development could be located externally, though no mechanical processes that generate noise would be necessary.

Otherwise, all other mechanical equipment would be fully enclosed within the structure. This would include mechanical, electrical, and plumbing rooms, as well as elevator equipment (including hydraulic pump, switches, and controllers) in the subterranean basement. All these activities would generally occur within the envelope of the development, operational noise would be shielded from off-site noise-sensitive receptors.

Outdoor Uses

While most operations would be conducted inside the development, outdoor activities could generate noise that could impact local sensitive receptors. This would include human conversation, trash collection, and landscape maintenance. These are discussed below:

- Human conversation. This could include human conversation, socializing, and passive recreation in outdoor spaces, which could include:
 - Second floor interior courtyard. This would be a shared use space for socializing or passive recreation (e.g., reading), with intermittent use largely during day or evening

¹⁹ Clean British Columbia. Heat Pumps and Noise. <https://vancouver.ca/files/cov/heat-pump-noise-guide.pdf>

²⁰ Washington State Department of Transportation, Noise Walls and Barriers. <https://wsdot.wa.gov/construction-planning/protecting-environment/noise-walls-barriers>. Assumes the Carrier's rated sound power of 76 dB.

²¹ Ibid.

hours. No powered speakers are proposed that would amplify either speech or music. Any noise from this area would be shielded on all sides by the development itself.

- Private balconies on all elevations. These would be private spaces for residents used for socializing or passive recreation (e.g., reading), with intermittent use largely during day or evening hours. No powered speakers are proposed that would amplify either speech or music.
- Roof decks. This would include four shared use space for socializing or passive recreation (e.g., reading, dining), with intermittent use largely during day or evening hours. There would be no direct line-of-sight from any roof deck noise to adjacent sensitive receptors, which would be 45 to 55 feet lower in height than the roof deck. Blocking the line of sight to a noise source generally results in a 5 decibel reduction.²² The presence of the roof edge, parapet, setback of decks from the roof's edge, and a stair bulkhead on the eastern edge of the roof would shield any rooftop noise from the sensitive receptors near the Project Site to the west and to the northwest across an alley. No powered speakers are proposed that would amplify either speech or music.

The primary use of these spaces would be for human conversation, which would produce negligible noise impacts, based on the Lombard effect. This phenomenon recognizes that voice noise levels in face-to-face conversations generally increase proportionally to background ambient noise levels. Specifically, vocal intensity increases about 0.38 dB for every 1.0 dB increase in noise levels above 55 dB.²³ For example, the sound of a human voice at 60 dB would produce a noise level of 39 dB at ten feet, which would not elevate ambient noise levels at any of the analyzed sensitive receptors by more than 0.2 dBA L_{eq} . Moreover, noise levels from human speech would attenuate rapidly with greater distance, resulting in a 33 dB noise level at twenty feet, and 27 dB at 40 feet.²⁴

- Trash collection. On-site trash and recyclable materials for the residents would be managed from the waste collection area on the first floor of the parking garage. Dumpsters would be moved to the street manually or with container handler trucks that use hydraulic-powered lifts that use beeping alerts during operation. Haul trucks would access solid waste from La Brea Avenue or Oakwood Avenue, where solid waste activities would include use of trash compactors and hydraulics associated with the refuse trucks themselves. Noise levels of approximately 71 dBA L_{eq} and 66 dBA L_{eq} could be generated by collection trucks and trash compactors, respectively, at 50 feet of distance.²⁵ Noise from these activities would be comparable to that associated with the existing commercial business; as such, the Project would not significantly change existing noise from trash collection or elevate ambient noise levels.

²² Washington State Department of Transportation, Noise Walls and Barriers. <https://wsdot.wa.gov/construction-planning/protecting-environment/noise-walls-barriers>.

²³ Acoustical Society of America, Volume 134; Evidence that the Lombard effect is frequency-specific in humans, Stowe and Golob, July 2013.

²⁴ Public Resources Code Section 21085 states that for residential projects, the effects of noise generated by project occupants and their guests on human beings is not a significant effect on the environment.

²⁵ RK Engineering Group, Inc. Wal-Mart/Sam's Club reference noise level, 2003.

- Landscape maintenance. Noise from gas-powered leaf blowers, lawnmowers, and other landscape equipment can generate substantial bursts of noise during regular maintenance. For example, two gas powered leaf blowers with two-stroke engines and a hose vacuum can generate an average of 85.5 dBA L_{eq} and cause nuisance or potential noise impacts for nearby receptors.²⁶ The landscape plan focuses on a modest palette of accent trees and raised planters that will minimize the need for powered landscaping equipment, as some of this can be managed by hand. Noise from these activities would be comparable to that associated with the existing commercial business; as such, the Project would not significantly change existing noise from landscape maintenance or elevate ambient noise levels.

As discussed above, the Project would not result in an exposure of persons to or a generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. The Project would also not increase surrounding noise levels by more than 5 dBA CNEL, the minimum threshold of significance based on the noise/land use category of sensitive receptors near the Project Site. As a result, the Project's on-site operational noise impacts would be considered less than significant,

Off-Site Operational Noise

The majority of the Project's operational noise impacts would be off-site from vehicles traveling to and from the development. The Project could add 180 vehicle trips to the local roadway network on weekdays when the development could be leased and operational in 2028. The majority of vehicle-related impacts at the Project Site would come from 15 and 17 vehicles entering and exiting the development during the peak A.M. and P.M. hours, respectively.²⁷ This would represent a small addition to traffic volumes on local roadways. For example, it would represent 4.5 percent of the 3,995 vehicles currently using La Brea Avenue at Oakwood Avenue in the A.M. peak hour.²⁸

Because it takes a doubling of traffic volumes (i.e., 100 percent) to increase ambient noise levels by 3 dBA L_{eq} , the Project's traffic would neither increase ambient noise levels 3 dBA or more into "normally unacceptable" or "clearly unacceptable" noise/land use compatibility categories, nor increase ambient noise levels 5 dBA or more. Twenty-four hour CNEL impacts would similarly be minimal, far below criterion for significant operational noise impacts, which begin at 3 dBA. As such, this impact would be considered less than significant.

Consistency with City General Plan Noise Element

While the City's Noise Element focuses on a number of measures for Citywide implementation by municipal government, there are some objectives, policies, and programs that are applicable to development projects. Table 7 summarizes the Proposed Project's consistency with these.

²⁶ Erica Walker et al, Harvard School of Public Health; Characteristics of Lawn and Garden Equipment Sound; 2017. These equipment generated a range of 74.0-88.5 dBA L_{eq} at 50 feet.

²⁷ DKA Planning, 2024. Hourly trip generation based on Institute of Transportation Engineer's hourly trip generation factors for Multifamily Housing (Mid-Rise) (land use code 221).

²⁸ DKA Planning, 2024, based on City of Los Angeles database of traffic volumes on La Brea Avenue at Oakwood Avenue, https://navigatela.lacity.org/dot/traffic_data/manual_counts/13171_LABOAK93.pdf; traffic counts adjusted by one percent growth factor to represent existing conditions.

Table 7
Project Consistency with City of Los Angeles General Plan Noise Element

Objective/Policy/Program	Project Consistency
Policy 2.2: Enforce and/or implement applicable city, state, and federal regulations intended to mitigate proposed noise producing activities, reduce intrusive noise and alleviate noise that is deemed a public nuisance.	Consistent. The Project would comply with City, state, and other applicable noise regulations to ensure that noise impacts are considered less than significant.
Objective 3 (Land Use Development): Reduce or eliminate noise impacts associated with proposed development of land and changes in land use.	Consistent. The project is being evaluated under CEQA and would result in less-than-significant impacts on noise.
Program 11. For a proposed development project that is deemed to have a potentially significant noise impact on noise sensitive uses, as defined by this chapter, require mitigation measures, as appropriate, in accordance with California Environmental Quality Act and city procedures.	Consistent. The Project would not have a significant noise impact on noise-sensitive uses and as such, would not require mitigation under CEQA.
Program 12. When issuing discretionary permits for a proposed noise-sensitive use (as defined by this chapter) or a subdivision of four or more detached single-family units and which use is determined to be potentially significantly impacted by existing or proposed noise sources, require mitigation measures, as appropriate, in accordance with procedures set forth in the California Environmental Quality Act so as to achieve an interior noise level of a CNEL of 45 dB, or less, in any habitable room, as required by Los Angeles Municipal Code Section 91.	Consistent. The noise-sensitive project is being evaluated under CEQA and would before being entitled would comply with Building Code and Title 24 noise insulation requirements to achieve an interior noise level of 45 dB.
Source: DKA Planning, 2024.	

- b. **For a project located within the vicinity of a private airstrip or an airport land use plan, or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?**

Less Than Significant Impact.

The Project Site is located about 7.0 miles east of the Santa Monica Airport. Because the Proposed Project would not be located within the vicinity of a private airstrip or within two miles of a public airport, the Project would not expose local workers or residents in the area to excessive noise levels. This would be considered a less than significant impact.

Cumulative Impacts

Construction

On-Site Construction Noise

During construction of the proposed Project, there could be other construction activity in the area that contributes to cumulative noise impacts at sensitive receptors. Noise from construction of development projects is localized and can affect noise-sensitive uses within 500 feet, based on the City's screening criteria. As such, noise from two construction sites within 1,000 feet of each other can contribute to cumulative noise impacts for receptors located between.

Construction-related noise levels from any related project would be intermittent and temporary. As with the Project, any related projects would comply with the LAMC's restrictions, including restrictions on construction hours and noise from powered equipment. Noise associated with cumulative construction activities would be reduced to the degree reasonably and technically feasible through proposed mitigation measures for each individual related project and compliance with the noise ordinance.

The City of Los Angeles confirmed that there are no related projects within 1,500 feet of the Project Site.²⁹ As a result, there are no reasonably foreseeable related projects that could contribute to cumulative noise impacts at the analyzed sensitive receptors. Based on this, there would not be cumulative noise impacts at any nearby sensitive uses located near the Project Site and related projects in the event of concurrent construction activities.

Off-Site Construction Noise

Other concurrent construction activities from related projects can contribute to cumulative off-site impacts if haul trucks, vendor trucks, or worker trips for any related project(s) were to utilize the same roadways. Distributing trips to and from each related project construction site substantially reduces the potential that cumulative development could more than double traffic volumes on existing streets, which would be necessary to increase ambient noise levels by 3 dBA. The Proposed Project would contribute up estimated 53 peak hourly PCE trips, as summarized in Table 6, during the building construction phase.³⁰ This would represent about 1.3 percent of traffic volumes on La Brea Avenue, which carries about 3,995 vehicles at Oakwood Avenue in the morning peak hour of traffic.³¹ Any related projects would have to add 3,942 peak hour vehicle trips to double volumes on La Brea Avenue.

²⁹ Personal communication. Ira Rodriguez, Transportation Engineering Associate II; City of Los Angeles Department of Transportation; July 2, 2024.

³⁰ This is a conservative, worst-case scenario, as it assumes all workers travel to the worksite at the same time and that vendor and haul trips are made in the same early hour, using the same route as haul trucks to travel to and from the Project Site.

³¹ DKA Planning, 2024, based on City of Los Angeles database of traffic volumes on La Brea Avenue at Oakwood Avenue, https://navigatela.lacity.org/dot/traffic_data/manual_counts/13171_LABOAK93.pdf; traffic counts adjusted by one percent growth factor to represent existing conditions.

As noted earlier, there are no nearby related projects that would contribute to local traffic noise from concurrent construction. As such, cumulative noise due to construction truck traffic from the Project and related projects do not have the potential to double traffic volumes on any roadway necessary to elevate traffic noise levels by 3 dBA, let alone the 5 dBA threshold of significance for traffic impacts. As such, cumulative noise impacts from off-site construction would be less than significant.

Operation

The Project Site and La Brea Avenue corridor and Hancock Park neighborhood has been developed with residential and commercial land uses that have previously generated, and will continue to generate, noise from a number of operational noise sources, including mechanical equipment (e.g., HVAC systems), outdoor activity areas, and vehicle travel. The three related projects in the vicinity of the Project Site are residential or mixed-use in nature and would also generate stationary-source and mobile-source noise due to ongoing day-to-day operations. These types of uses generally do not involve use of noisy heavy-duty equipment such as compressors, diesel-fueled equipment, or other sources typically associated with excessive noise generation.

On-Site Stationary Noise Sources

Noise from on-site mechanical equipment (e.g., HVAC units) and any other human activities from related projects would not be typically associated with excessive noise generation that could result in increases of 5 dBA or more in ambient noise levels at sensitive receptors when combined with operational noise from the Proposed Project. The presence of intervening multi-story buildings along La Brea Avenue and the residential neighborhoods that flank it will generally shield noise impacts from one or more projects that may generate operational noise. Therefore, cumulative stationary source noise impacts associated with operation of the Project and related projects would be less than significant.

Off-Site Mobile Noise Sources

The Project would add 180 vehicle trips to the local roadway network on weekdays when the development could be leased and operational in 2028. The majority of vehicle-related impacts would come from 15 and 17 vehicles entering and exiting the development during the peak A.M. and P.M. hours, respectively.³² This would represent a 4.5 percent increase from the 3,995 vehicles currently using La Brea Avenue at Oakwood Avenue in the A.M. peak hour.³³ As noted earlier, there are no related projects that would contribute significantly to local traffic noise impacts.

³² DKA Planning, 2024. Hourly trip generation based on Institute of Transportation Engineer's hourly trip generation factors for Multifamily Housing (Mid-Rise) (land use code 221).

³³ DKA Planning, 2024, based on City of Los Angeles database of traffic volumes on La Brea Avenue at Oakwood Avenue, https://navigatela.lacity.org/dot/traffic_data/manual_counts/13171_LABOAK93.pdf; traffic counts adjusted by one percent growth factor to represent existing conditions.

Therefore, cumulative noise impacts due to off-site traffic would not increase ambient noise levels by 3 dBA to or within their respective “Normally Unacceptable” or “Clearly Unacceptable” noise categories, or by 5 dBA or greater overall. Additionally, the Project would not result in an exposure of persons to or a generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

TECHNICAL APPENDIX



DOUGLASKIM+ASSOCIATES,LLC

AMBIENT NOISE MODELING

Noise emissions of road traffic

Station km	ADT Veh/24	Vehicles type	Traffic values					Control device	Cons Speed km/h	Affected veh. %	Road surface	Gradient Min / Max %
			Vehicle name	day Veh/h	evening Veh/h	night Veh/h	Speed km/h					
Oakwood Avenue												
Traffic direction: In entry direction												
0+00	7812	Total	-	651	-	-	-	Traffic li	48.0	66.0	Average (of DGAC	0.6
		Automobiles	-	537	-	-	35					
		Medium trucks	-	83	-	-	35					
		Heavy trucks	-	2	-	-	35					
		Buses	-	1	-	-	35					
		Motorcycles	-	15	-	-	35					
		Auxiliary vehicle	-	13	-	-	35					
La Brea Avenue												
Traffic direction: In entry direction												
0+00	47940	Total	-	3995	-	-	-	Traffic li	56.0	33.0	Average (of DGAC	-0.6
		Automobiles	-	3295	-	-	56					
		Medium trucks	-	512	-	-	56					
		Heavy trucks	-	14	-	-	56					
		Buses	-	5	-	-	56					
		Motorcycles	-	91	-	-	56					
		Auxiliary vehicle	-	78	-	-	56					
Alley (East of La Brea)												
Traffic direction: In entry direction												
0+00	180	Total	-	15	-	-	-	Stop sig	20.0	33.0	Average (of DGAC	-0.5
		Automobiles	-	15	-	-	25					
		Medium trucks	-	-	-	-	25					
		Heavy trucks	-	-	-	-	25					
		Buses	-	-	-	-	25					
		Motorcycles	-	-	-	-	25					
		Auxiliary vehicle	-	-	-	-	25					
Alley (West of La Brea)												
Traffic direction: In entry direction												
0+00	180	Total	-	15	-	-	-	Stop sig	20.0	33.0	Average (of DGAC	-0.9
		Automobiles	-	15	-	-	25					
		Medium trucks	-	-	-	-	25					
		Heavy trucks	-	-	-	-	25					
		Buses	-	-	-	-	25					
		Motorcycles	-	-	-	-	25					
		Auxiliary vehicle	-	-	-	-	25					

Receiver list

No.	Receiver name	Coordinates		Building side	Floor	Height abv.grd. m	Limit Day dB(A)	Level Day dB(A)	Conflict Day dB
		X	Y						
1	Residences - Detroit St. (300 block)	11375932.90	3771607.04	East	GF	75.75	-	57.8	-
2	Residences - Detroit St. (400 block)	11375920.01	3771664.58	South	GF	75.34	-	62.3	-
3	Residences - Sycamore Avenue	11376043.06	3771623.34	West	GF	74.81	-	56.4	-

Contribution levels of the receivers

Source name	Traffic lane	Level Day dB(A)
Residences - Detroit St. (300 block) GF		57.8
Alley (East of La Brea)	-	23.3
Alley (West of La Brea)	-	41.8
La Brea Avenue	-	57.1
Oakwood Avenue	-	48.8
Residences - Detroit St. (400 block) GF		62.3
Alley (East of La Brea)	-	16.8
Alley (West of La Brea)	-	32.8
La Brea Avenue	-	57.7
Oakwood Avenue	-	60.5
Residences - Sycamore Avenue GF		56.4
Alley (East of La Brea)	-	46.2
Alley (West of La Brea)	-	19.9
La Brea Avenue	-	53.6
Oakwood Avenue	-	52.2



DOUGLASKIM+ASSOCIATES,LLC

CONSTRUCTION NOISE CALCULATIONS

Noise emissions of industry sources

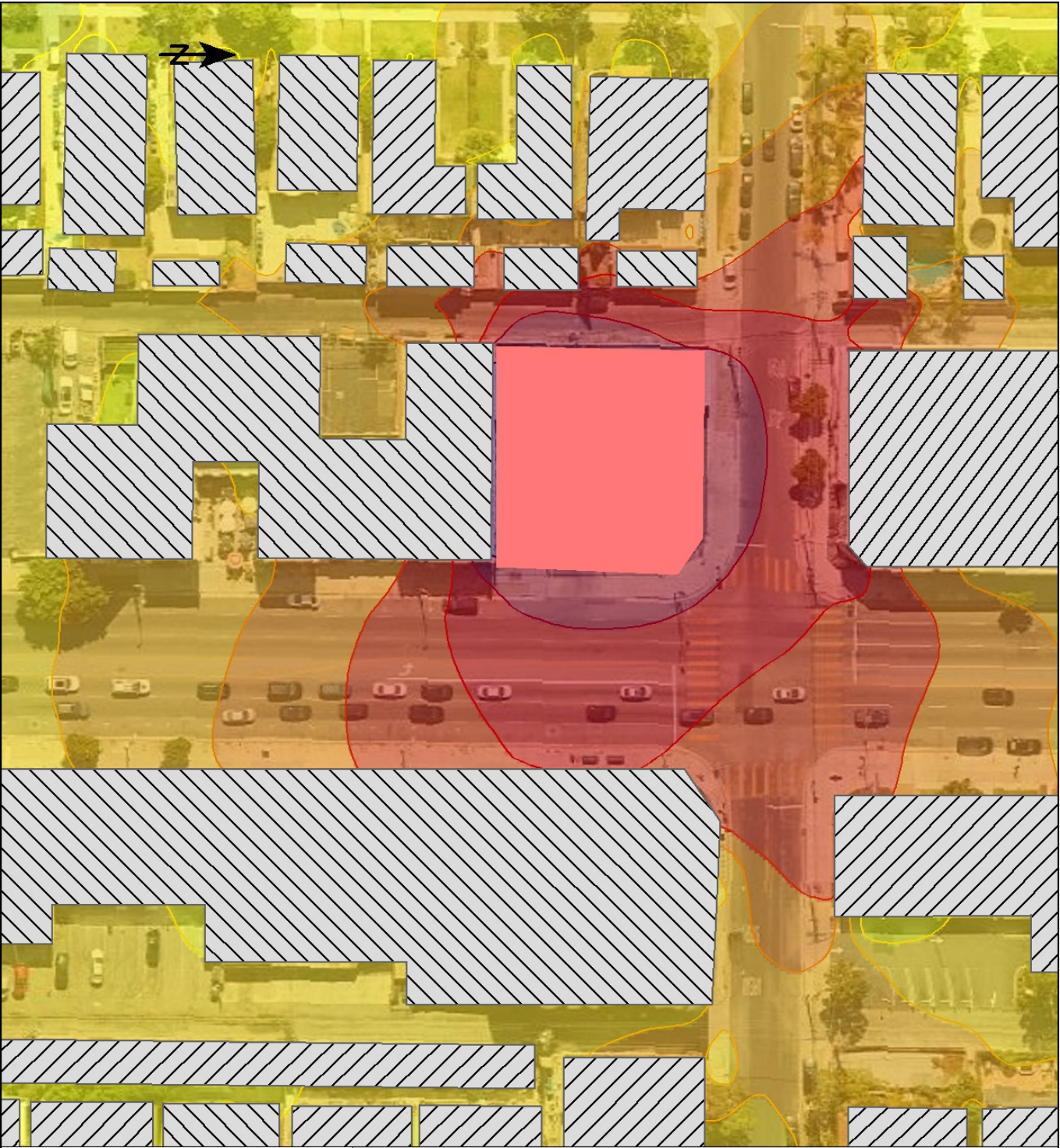
Source name	Size m/m²	Reference	Level			Corrections		
			Day dB(A)	Evening dB(A)	Night dB(A)	Cwall dB	CI dB	CT dB
Construction Site	935 m²	Lw/unit	106.5	-	-	-	-	-

Receiver list

No.	Receiver name	Coordinates		Building side	Floor	Height abv.grd. m	Limit Day dB(A)	Level Day dB(A)	Conflict Day dB
		X	Y						
1	Residences - Detroit St. (300 block)	11375932.90	3771607.04	East	GF	75.75	-	60.7	-
2	Residences - Detroit St. (400 block)	11375920.01	3771664.58	South	GF	75.34	-	59.9	-
3	Residences - Sycamore Avenue	11376043.06	3771623.34	West	GF	74.81	-	49.2	-

Contribution levels of the receivers

Source name	Traffic lane	Level Day dB(A)
Residences - Detroit St. (300 block) GF		60.7
Construction Site	-	60.7
Residences - Detroit St. (400 block) GF		59.9
Construction Site	-	59.9
Residences - Sycamore Avenue GF		49.2
Construction Site	-	49.2

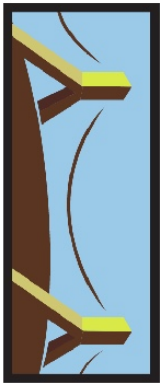
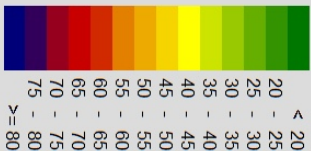


361 North La Brea Avenue

Signs and symbols

-  Building
-  Construction Site




Levels in dB(A)



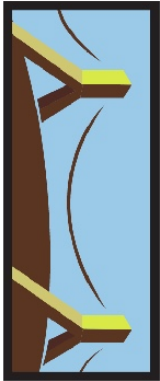
DOUGLASKIM+ASSOCIATES, LLC

361 North La Brea Avenue

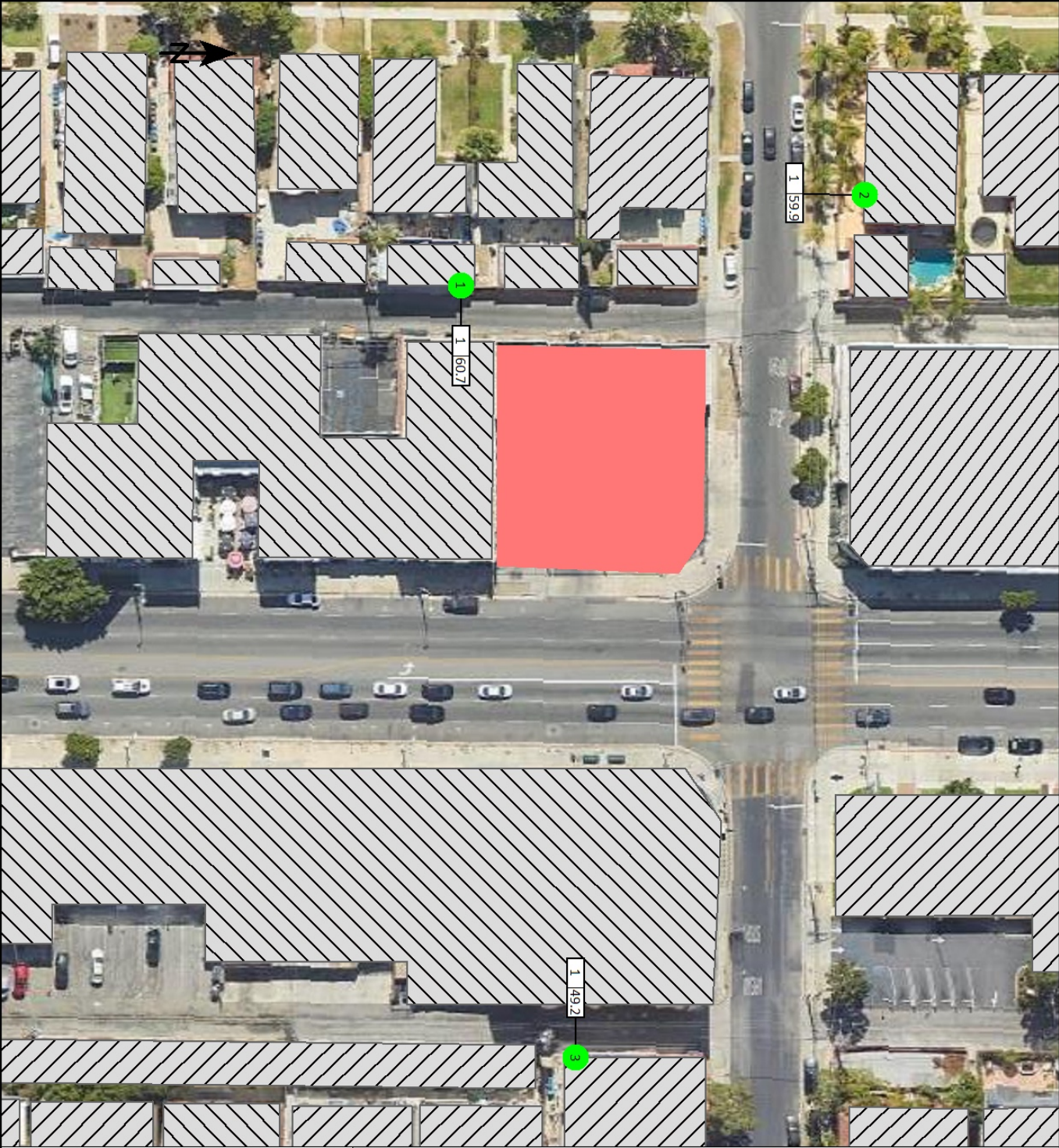
Signs and symbols

-  Building
-  Analyzed Sensitive Receptor
-  Construction Site

1 : 60
0 12.5 25 50 75 100 feet



DOUGLASSKIM+ASSOCIATES, LLC



Construction Noise Impacts



DOUGLAS KIM + ASSOCIATES

Receptor	Existing Leq	Noise	New Leq	Difference Leq	Significant?
Residences - Detroit St. (300 block)	57.8	60.7	62.5	4.7	No
Residences - Detroit St. (400 block)	62.3	59.9	64.3	2.0	No
Residences - Sycamore Ave.	56.4	49.2	57.2	0.8	No

OFF-SITE CONSTRUCTION-RELATED TRAVEL VOLUMES



Construction Phase	Worker Trips	Vendor Trips	Haul Trips	Total	% of Traffic Volumes
Demolition	10	0	10.8	21	0.5%
Grading	7.5	0	0	8	0.2%
Trenching	2.5	0		3	0.1%
Building Construction	32.2	21.3		53	1.3%
Architectural Coatings	6.44	0		6.44	0.2%
<i>Haul trips represent heavy-duty truck trips with a 19.1 Passenger Car Equivalent applied; Vendor trips are an even split of medium- and heavy-duty trucks.</i>					

3,995 Traffic Volumes on La Brea Avenue at Oakwood Avenue in the peak A.M. hour



DOUGLASKIM+ASSOCIATES,LLC

DEMOLITION ANALYSIS



Douglas Kim + Associates, LLC

CONSTRUCTION BUILDING DEBRIS

Materials	Total SF	Height	Cubic Yards	Pounds per Cub	Tons	Truck Capacity (CY)	Truck Trips	Source
Construction and Debris	0	0	-	484	-	10	-	Florida Department of Environmental Protection A Fact Sheet for C&D Debris Facility Operators <i>Federal Emergency Management Agency, Debris Estimating Field Guide (FEMA 329), September 2010. General Building Formula</i>
General Building	2,975	12	436	1,000	218	10	87	<i>Federal Emergency Management Agency, Debris Estimating Field Guide (FEMA 329), September 2010. Single Family Residence Formula, assumes 1 story, Medium vegetative cover multiplier (1.3)</i>
Single Family Residence	-	12	-	1,000	-	10	-	Florida Department of Environmental Protection A Fact Sheet for C&D Debris Facility Operators
Multi-Family Residence		12	-	1,000	-	10	-	
Mobile Home			-	1,000	-	10	-	
Mixed Debris			-	480	-	10	-	
Vegetative Debris (Hardwoods)			-	500	-	10	-	
Vegetative Debris (Softwoods)			-	333	-	10	-	
Asphalt or concrete (Construction)	6,950	0.5	129	2,400	154	10	26	
TOTAL			565		373		113	



DOUGLASKIM+ASSOCIATES,LLC

TRAFFIC NOISE CALCULATIONS

TRAFFIC COUNT SUMMARY

City of Los Angeles
Department of Transportation
(Rev Apr 92)

STREET:
North/South LA BREA AV

East/West OAKWOOD AV

Day: THUR Date: MAR 18, 1993 Weather: CLEAR

Hours: 7-10 AM 3-6 PM

School Day: YES District: HW

	N/B	S/B	E/B	W/B
DUAL-WHEELED	351	280	15	17
BIKES	58	32	20	11
BUSES	36	33	0	0

	N/B	TIME	S/B	TIME	E/B	TIME	W/B	TIME
AM PK 15 MIN	383	8.45	402	8.45	53	8.45	97	8.15
PM PK 15 MIN	472	5.00	468	5.00	82	4.30	66	4.30
AM PK HOUR	1431	8.15	1511	8.00	184	8.45	320	7.45
PM PK HOUR	1870	5.00	1766	5.00	304	4.30	215	4.00

NORTHBOUND Approach					SOUTHBOUND Approach					TOTAL	XING S/L		XING N/L	
Hours	Lt	Th	Rt	Total	Hours	Lt	Th	Rt	Total	N-S	Ped	Sch	Ped	Sch
7-8	20	870	17	907	7-8	9	1185	24	1218	2125	44	3	8	1
8-9	24	1357	43	1424	8-9	20	1454	37	1511	2935	79	10	24	5
9-10	17	1221	35	1273	9-10	17	1230	33	1280	2553	40	5	12	0
3-4	36	1535	49	1620	3-4	24	1536	35	1595	3215	10	0	16	4
4-5	29	1576	51	1656	4-5	18	1592	39	1649	3305	29	8	20	4
5-6	27	1800	43	1870	5-6	20	1700	46	1766	3636	24	23	21	12
TOTAL	153	8359	238	8750	TOTAL	108	8697	214	9019	17769	226	49	101	26

EASTBOUND Approach					WESTBOUND Approach					TOTAL	XING W/L		XING E/L	
Hours	Lt	Th	Rt	Total	Hours	Lt	Th	Rt	Total	E-W	Ped	Sch	Ped	Sch
7-8	20	33	26	79	7-8	54	62	23	139	218	19	0	43	7
8-9	48	63	53	164	8-9	134	138	42	314	478	27	11	42	20
9-10	54	54	58	166	9-10	68	65	38	171	337	17	0	41	8
3-4	96	69	51	216	3-4	49	45	52	146	362	16	16	30	3
4-5	120	107	64	291	4-5	83	86	46	215	506	22	19	38	27
5-6	92	132	61	285	5-6	71	68	36	175	460	19	20	32	25
TOTAL	430	458	313	1201	TOTAL	459	464	237	1160	2361	120	66	226	90

TRAFFIC VOLUME ADJUSTMENTS

North/South La Brea Avenue
 East/West Oakwood Avenue
 Year 1993
 Hour 8:00-9:00 A.M.
 Source https://navigatela.lacity.org/dot/traffic_data/manual_counts/13171_LABOAK93.pdf



	NB Approach	SB Approach	EB Approach	WB Approach	
LT					
TH					
RT					
Total	1424	1511	164	314	1.07%

2024	1,939	2,057	223	427
		3,995		651

	NB Approach	SB Approach	EB Approach	WB Approach		
Auto	1,599	1,697	184	353	6,048,810	82.5%
MDT	248	264	29	55	940,092	12.8%
HDT	7	7	1	1	25,348	0.3%
Buses	2	3	0	1	9,386	0.1%
MCY	44	47	5	10	167,287	2.3%
Aux	38	40	4	8	142,856	1.9%
Total	1,939	2,057	223	427	7,333,779	100.0%

3,295	537
512	83
14	2
5	1
91	15
78	13
3,995	651

Exhibit B.3

Environmental Documents (ENV-2024-5978-CE)

Phase II Report

ENCON

PHASE II ESA ADDENDUM REPORT

Commercial and Residential Environmental Clearance Report

Subject Property:

Commercial Property
Hertz Car Rental Operation
361 North La Brea Avenue
Los Angeles, California 90036

Performed for:

Property Owner
361 North La Brea LLC
11627 Telegraph Road, Suite 200
Santa Fe Springs, California 90670

Prepared by:

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July 22, 2024

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ATTACHMENTS:

Attachment A Current Site Photos

FIGURES:

Figure 1	Site Vicinity Map
Figure 2	Site Map with Sampling Locations

EXHIBITS:

Exhibit A	Soil Analytical Laboratory Reports – May 2022
Exhibit B	Soil Gas Analytical Laboratory Report – May 2022
Exhibit C	Geophysical Survey Report
Exhibit D	ENCON Phase II ESA Report, dated July 2022 (text only)
Exhibit E	Partner Phase I ESA Report, dated April 15, 2022 (text only)

1.0 INTRODUCTION

ENCON Technologies Inc. (ENCON) was retained by 361 North La Brea LLC (Project Client) to conduct an Environmental Site Assessment Evaluation and Phase II ESA at the Hertz Rent-a-Car commercial property located at 361 North La Brea Avenue in Los Angeles, California 90036 (Subject Site). The purpose of the Phase II ESA Addendum Report is to evaluate the current commercial Subject Site environmental conditions for residential redevelopment planning purposes based on the previous soil and soil gas subsurface investigation soil data and site commercial clearance findings reported in the ENCON Phase II ESA Report, dated July 2022 and provided in Exhibit D for reference. As part of this Addendum Report, ENCON verified that the Subject Site auto rental and maintenance service operations have remained about the same, are in environmental compliance and have not used or stored hazardous materials or wastes as part of the on-site operations between May 2022 and July 2024.

Based on these objectives, ENCON developed the following scope of work under the direction and supervision of ENCON Registered Environmental Professional, Mr. G. Joseph Scatoloni which are further described in this Bridge Environment Site Assessment Report.

- **Task 1** – Review the sampling and analysis plan (SAP), soil data results and findings from the previous ENCON Phase II ESA Soil and Soil Gas Investigation Report, dated July 2022, provided in Exhibit D for reference purposes.
- **Task 2** – Conduct a site inspection to verify that current Hertz car rental site conditions have not functionally or operationally changed from the general automotive rental service and car wash operations, the site conditions are generally the same as in 2022 and employing good housekeeping standards with no indications of chemical spills, leaks, nor surface staining.
- **Task 3** – Perform a current vapor intrusion health risk assessment to confirm the Subject Site is suitable for the planned future residential use based on the recent shallow soil gas VOC data provided in the referenced previous ENCON Phase II ESA Report, dated July 2022, and based on the assumption that the soil gas data has not changed over the past two (2) years of Hertz Rental operations.
- **Task 4** – Prepare this Phase II ESA Addendum Report describing the site inspection results and health risk assessment rationale and evaluation protocol used in evaluating and clearing the Subject Site for future residential redevelopment use.

2.0 SUBJECT SITE BACKGROUND INFORMATION

The Subject Site is located on the southwest corner of North La Brea Avenue and Oakwood Avenue. The Subject Site is currently operated by Hertz Rent-A-Car for commercial use since 2016 to the present time. Onsite operations include of car storage and vehicle rental services and the current structures include a large asphalt parking lot, Hertz Rental retail offices, 2-tent car washing operation on the south portion of the property, and a small food service warehouse located on the southwest portion of the property. No automotive service, automotive repair, gas storage, or gas dispensing activities are conducted on the Subject Site at this time or in the past, since the 1950s when Chandler & King Auto Service occupied the property.

The previous ENCON Phase II ESA Subsurface Investigation in July 2022 was conducted to evaluate the potential impact of automotive petroleum hydrocarbons and volatile organic compounds to soil and soil gas from the former gas service station that operated at the Subject Site between 1928 and 1953 as well as the recent Hertz Rental car wash clarifier activities based on the findings and recommendations provided in the Partner Phase I ESA Report, dated April 15, 2022, provided in Exhibit E for reference.

3.0 ENVIRONMENTAL SETTING

3.1 Geology

The 2022 United States Geological Survey (USGS) *Hollywood, California* Quadrangle 7.5-minute series topographic map was reviewed as part of the Phase I ESA performed by Partner. According to the contour lines on the topographic map, the Subject Site is located at approximately 235 feet above mean sea level (aMSL), and the Subject Site is sloping toward the southwest.

The Subject Site is located in the Los Angeles Basin, which is within the northwest portion of the Peninsular Range geomorphic province. The basin is bounded to the north by the Santa Monica Mountains and Elysian Hills, to the east by the Puente and Merced Hills, and to the south by the Santa Ana Mountains. The Subject Site is within the southwestern margin of a physiographic feature known as the La Brea Plain, an older alluvial deposit along the southern limit of the Santa Monica Mountains, west of the Elysian Hills and east of the Newport Inglewood fault zone.

The La Brea Plain is an alluvial apron formed by the deposition of alluvial sediments on an erosional surface cut into underlying lower Pleistocene and older formations. Soil profiles up to 20 feet in thickness have been recognized on the older alluvial aprons of the coastal plain and typically consist of weathered, reddish brown soils with gravel to boulder-sized rock fragments derived from the nearby hillside areas. These older alluvial aprons are generally underlain by thick water-bearing sediments, some of which are susceptible to recharge and can affect groundwater storage of underlying aquifers.

Based on information obtained from the Program Environmental Impact Report for Hollywood Community Plan Area (CPA) prepared by Los Angeles City Planning Department in March, 2011, much of the Subject Site vicinity is built on an alluvial fan created by sediments carried by water flowing out of area canyons. The geologic unit underling the CPA is alluvium. Alluvium consists of sediments eroded, transported and deposited by water flow. Coarser sediments tend to be deposited in the mountains while finer sediment is deposited far from the mountains. These finer sediments may include large amounts of sand and sandy silt which move easily during seismic activity. This type of soil tends to amplify damage during seismic activity (Partner, 2022).

3.2 Hydrogeology

While under natural and undisturbed conditions shallow groundwater flow most frequently follows the topography of the land surface, natural or man-made features can affect flow direction, and the presumed flow may not match the actual flow directions at the Subject Site and vicinity. Topographic map interpretation indicates the direction of groundwater flow in the vicinity of the Subject Site is inferred to be toward the southwest.

According to information on the State Water Resources Control Board GeoTracker database, the depth to groundwater in the vicinity of the Subject Site is inferred to be approximately 17 to 19 feet below ground surface (feet bgs) with groundwater flow toward the northwest.

According to available information, a public water system operated by the Los Angeles Department of Water and Power (LADWP) serves the Subject Site vicinity. The sources of public water for the City of Los Angeles are surface waters from the State Water Project (including 22 dams and reservoirs), Colorado River, Owens River, Mono Lake Basin, and approximately 30-percent comes from groundwater source. (Partner, 2022).

4.0 SCOPE OF PREVIOUS PHASE II ESA INVESTIGATION – MAY 2022

On May 15, 2022, ENCON performed soil and soil gas sampling as part of the previous Phase II ESA soil and soil gas investigation. During this investigation seven (7) exploratory soil borings and eight (8) subsurface soil gas probes were advanced, as described in Table 1 below and shown in Figure 2. ENCON's Sampling and Analysis Plan (SAP) was expanded in the field to include additional soils, soil gas, and sub-slab soil vapor sampling based on refusal encountered during the field activities. It was ENCON's professional opinion that this approach would provide sufficient soil and soil gas data to evaluate the Subject Site Recognized Environmental Conditions (RECs) as well as indicate the presence of any significant adverse environmental conditions of concern from the past gasoline station and automotive service operations that may limit or restrict the use of the Subject Site for the current commercial use.

The soil and soil gas samples were collected using a 5410 Geoprobe direct-push drilling rig and proper environmental clean-sampling methods. The soil samples were collected using a direct-push sampler 1" diameter polyethylene sleeve. The soil gas samples were collected using a calibrated vacuum pump and Tedlar bags. The soil and soil gas samples were labeled and transported to a State certified laboratory for analysis using proper chain-of-custody documentation and procedures. Selected soil and gas samples were analyzed for petroleum hydrocarbons using EPA Method 8015M and volatile organic compounds (VOCs) using EPA Method 8260B.

5.0 FURTHER PH II INVESTIGATION / EVALUATION – JULY 2024

5.1 Current Site Environmental Inspection

On July 11, 2024, a site walk inspection was performed by Mr. G. Joseph Scatoloni, Registered Environmental Professional, to verify that the current Hertz Rent-a-Car site conditions have not functionally or operationally changed from general automotive rental service and car wash operations and are employing good housekeeping standards with no indications of chemical spills and leak surface staining. Based on ENCON's site inspection, the Subject Site was fully operational with rental vehicles stored in the front parking lot area, customers and office work activities inside the building, and both car wash stalls in operation on the south portion of the property. There was no indication of hazardous material operations or auto service solvent staining, including no evidence of automotive repairs or waste drum storage, and the property appeared to be in good housekeeping condition and similar to the conditions present in May 2022. Refer to Attachment A for current site photographs.

The Subject Site was confirmed by ENCON staff to have essentially the same operations at this time as those present in May 2022. Based on this, the previous analytical results can be used to further evaluate the present site conditions and potential future commercial or residential uses.

6.0 SOIL AND SOIL GAS SUBSURFACE INVESTIGATION RESULTS AND EVALUATION CRITERIA FOR COMMERCIAL USE – MAY 2022

6.1 ESA Evaluation Criteria

Low Risk Screening Evaluation Criteria: (RWQCB Region 4 Interim Site Assessment & Cleanup Guidelines May 1996, DTSC Note 3 June 20220, SFRWQCB ESLs, 2019, DTSC VI Guidance Oct 2011 and Feb 2020, CalEPA OHHEA Regional Water Quality Control Board Agency Memo, September 2018, and ASTM E1739-15, X1.7.11): The USEPA and CalEPA agencies have adopted a one-in-million (1.0×10^{-6}) cancer risk as being of negligible concern and in targeted commercial settings, theoretical cancer risks of up to 1.0×10^{-4} have been acceptable. Risk levels between 1.0×10^{-6} to 1.0×10^{-4} are within the acceptable further evaluation and management decision risk range (DTSC VI Screening and Evaluating Guidance Feb 2020). The risk level of 1.0×10^{-5} is the midpoint of the manageable risk range and generally acceptable “no significant risk” for a commercial setting. Maximum cancer risk levels above 1.0×10^{-4} generally require corrective actions.

6.2 Soil Sample Analytical Results

As part of the SAP performed in May 2022, a total of eight (8) soil samples were collected and submitted for analysis for total petroleum hydrocarbons in the waste oil range (TPHo) using EPA Method 8015M and petroleum hydrocarbons in the gasoline range (TPHg), fuel additives and volatile organic compound solvents (VOCs) using EPA Method 8260B. The soil analytical results are summarized in Table 1 and Table 2 below. The soil analytical results are available in Exhibit A for reference.

**Table 1: Soil Sample Analytical Results in the Former Fueling Operation Area
Sampled on May 15, 2022**

Sample ID	TPHg (mg/kg)	Benzene (ug/kg)	Ethylbenzene (ug/kg)	Toluene (ug/kg)	Xylenes (ug/kg)	Naphthalene (ug/kg)	MtBE (ug/kg)	All Other VOCs (ug/kg)
SB6-5	ND	ND	ND	ND	ND	ND	ND	ND
SB6-10	ND	ND	ND	ND	ND	ND	ND	ND
D1-4	ND	ND	ND	ND	ND	ND	ND	ND
D2-4	ND	ND	ND	ND	ND	ND	ND	ND
RL	0.2	1.0	1.0	1.0	1.0	1.0	1.0	1.0
Direct soil exposure risk levels	100	1,400	26,000	NA	NA	3,800	210	Varies
Leaching to groundwater levels	500	25	430	3,200	2,100	42	28	Varies

Note: ND – Not detected above laboratory reporting limits; RL – Laboratory reporting limit; NA – Not published
 mg/kg – milligrams per kilogram; ug/kg – micrograms per kilogram
 VOCs – Volatile Organic Compounds
 TPHg – petroleum hydrocarbons in the gasoline carbon range
 MtBE – Methyl tert-butyl ether

Table 2: Soil Sample Analytical Results in the Former Automotive Service and Current Clarifier Area – Sampled on May 15, 2022

Sample ID	TPHo (mg/kg)	Benzene (ug/kg)	Ethylbenzene (ug/kg)	PCE (ug/kg)	TCE (ug/kg)	Naphthalene (ug/kg)	Toluene (ug/kg)	All Other VOCs (ug/kg)
SB1-5	ND	ND	ND	ND	ND	ND	ND	ND
SB2-5	ND	ND	ND	ND	ND	ND	ND	ND
SB3-5	ND	ND	ND	ND	ND	ND	ND	ND
SB4-5	ND	ND	ND	ND	ND	ND	ND	ND
RL	0.2	1.0	1.0	1.0	1.0	1.0	1.0	1.0
Direct soil exposure risk levels	1,000	1,400	26,000	2,700	5,000	3,800	NA	Varies
Leaching to groundwater levels	10,00	25	430	50	50	42	3,200	Varies

Note: ND – Not detected above laboratory reporting limits; RL – Laboratory reporting limit; NA – Not published

mg/kg – milligrams per kilogram; ug/kg – micrograms per kilogram

VOCs – Volatile Organic Compounds; PCE – Tetrachloroethylene Chlorinated Solvent; TCE – Trichloroethylene Chlorinated Degrading Solvent

TPHo – petroleum hydrocarbons in the oil carbon range

None of the analyzed soil samples contained detectable concentrations of TPHo, TPHg or VOC automotive solvents and fuel additives. This soil data suggests that the Subject Site has not been adversely impacted by the former fueling station, former automotive service, or current on-site clarifier operations. Therefore, based on the soil results, no targeted sources were detected beneath the Subject Site and no remediation was warranted as the threat to regional groundwater and direct exposure risk is low, or *de minimus*, from the historical and current Site operations.

6.3 Subsurface Shallow Soil Gas Sample Analytical Results

As part of the SAP, four (4) soil gas borings (SV1, SV2, SV3, and SV4) were advanced to a depth of 5 feet bgs, one (1) soil gas boring (SV5) was advanced to a depth of 12 feet bgs with soil gas samples collected at 5 feet and 12 feet bgs, and three (3) soil gas boring (SV6, D1 and D2) were advanced to a depth of 4 feet bgs. Soil gas samples were collected and submitted for analysis for VOCs using EPA Method 8260B. The soil gas analytical results are summarized in Table 3 below. The soil gas analytical results are available in Exhibit B for reference.

Table 3: Subsurface Soil Gas Sample Analytical Results – Sampled on May 15, 2022

Sample ID	Benzene (ug/L)	Ethylbenzene (ug/L)	PCE (ug/L)	Naphthalene (ug/L)	Toluene (ug/L)	All Other VOCs (ug/L)
SV1-5	ND	0.045	ND	ND	0.152	ND
SV2-5	ND	0.009	ND	ND	0.044	ND
SV3-5	0.010	0.010	ND	ND	0.055	ND
SV4-5	0.021	0.014	ND	ND	0.088	ND
SV5-5	0.014	0.020	ND	ND	0.072	ND
SV5-12	ND	0.027	ND	ND	0.075	ND
D1-4	0.009	0.025	ND	ND	0.070	ND
D2-4	0.035	0.058	ND	ND	0.264	ND
SV6-4	0.023	0.257	ND	ND	0.230	ND
RL	1.0	1.0	1.0	1.0	1.0	1.0
No Significant VI Risk – Soil Gas Screening Levels (1.0×10^{-05}) for Current Commercial Setting, CalEPA DTSC SSLs June 2020 / AF of 0.03	0.140	1.60	0.67	0.120	NA	Varies
Future Residential Use- No Risk – De Minimis Threat Soil Gas Screening Estimated Levels (1.0×10^{-06}) Acceptable for Residential Use, CalEPA DTSC Feb 2019 and AF of 0.001	0.097	1.10	0.46	0.083	NA	Varies

Note: ND – Not detected above laboratory reporting limits; RL – Laboratory reporting limit; NA – Not published
VOCs – Volatile Organic Compounds, specifically hydrocarbon and chlorinated solvents using EPA Method 8260B;
PCE – Tetrachloroethane; Naphthalene – Gasoline and auto repair solvent

Based on the soil gas analytical results, trace levels of gasoline additives benzene, ethylbenzene, and toluene were detected. Benzene and ethylbenzene are solvents of health risk VI concern ranging up to a maximum of 0.035 ug/L and 0.257 ug/L, respectively. These benzene and ethylbenzene concentrations were above the laboratory reporting limits but below the projected soil gas no significant vapor intrusion (VI) risk Environmental Screening Levels (ESLs) at the most conservative attenuation factor of 0.03, of 0.140 ug/L and 1.60 ug/L, respectively, for the current commercial use.

Therefore, the potential VI threat was determined to be low, at no significant health cancer risk, and acceptable for the commercial use of the Subject Site.

7.0 EVALUATION FOR RESIDENTIAL USE – JULY 2024

7.1 Soil Gas Vapor Intrusion Evaluation Guidelines

For a future affordable housing or equivalent (residential) land redevelopment and uses, the Subject Site vapor intrusion evaluations were conducted using DTSC published health risk assessment methods for future residential redevelopment and usage settings, as referenced in HHRA HERO Note #3 / Note #5 and described in DTSC Feb 2020 and Oct 2011 Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air (Table 2, 2011 VIG). The Guidance allows the use a Vapor Intrusion (VI) attenuation factor (AF) of 0.001 for preliminary indoor air health risk assessment screening evaluations in a future residential redevelopment use at a health risk benchmark of 1.0×10^{-6} cancer risk.

7.2 Soil Gas Evaluation and Conclusions for Current Commercial Use

The soil vapor analytical VOC data obtained from shallow subsurface soil gas samples collected from the Subject Site in the vicinity of the current building structure were found to be below laboratory reporting limits for all commercial VOCs, except for slightly elevated levels of benzene, toluene and ethylbenzene, of which benzene and ethylbenzene are constituents of cancer health risk concern, requiring further health risk evaluation for the future residential use of the Subject Site.

The shallow soil gas subsurface benzene and ethylbenzene auto parts-cleaning solvent concentrations, ranging up to a maximum of 0.035 ug/L, and 0.257 ug/L, respectively, in shallow soils and these VOC concentrations are below the DTSC published “no significant health risk” and low risk health risk benchmark conservative soil gas screening level concentrations for current commercial use of 0.140 ug/L, and 1.60 ug/L, respectively, based on the most conservative published vapor intrusion attenuation factor of 0.03.

All these shallow soil gas VOC concentrations are tabulated in Table 3 above. These results are well below the acceptable commercial DTSC Vapor Intrusion Soil Gas Screening Levels allowable for “no significant health risk” levels of 1.0×10^{-5} to the workers and public as tabulated in Table 3 above and determined in Table 4 below for onsite vapor intrusion health risk assessment.

To further evaluate the total Subject Site vapor intrusion for current commercial use, the following site cumulative indoor air quality health cancer risk was calculated for all of the VOCs detected beneath the Subject Site to confirm the safety and suitability of the Subject Site for commercial use.

**Table 4: Calculated Cumulative Indoor Air VI Health Risk Assessment
for Current Commercial Retail Use**

Constituents	Maximum SSG Concentration, ug/L	CalEPA 1.0x10 ⁻⁰⁵ SG Screening Level	Calculated Cancer Risk	Calculated Non-Cancer Risk
Benzene	0.035	0.140	0.250x10 ⁻⁰⁵	0.079
Toluene	0.264	NA	0.000x10 ⁻⁰⁵	0.000
Ethylbenzene	0.257	1.60	0.160x10 ⁻⁰⁵	0.002
Total Cumulative Risk for Current Commercial Use @ AF = 0.03			0.410x10⁻⁰⁵	0.081

Note: NA – no published cancer risk screening levels

For preliminary current commercial planning purposes, the total site cumulative cancer vapor intrusion health risk estimates for current or future commercial development uses at the Subject Site, based on the maximum detected shallow soil gas data and a vapor intrusion (VI) attenuation factor of 0.03, was calculated to be 0.410x10⁻⁰⁵ that is within an acceptable “no significant risk” or low health risk of 1.0x10⁻⁰⁵ and a hazard quotient of 0.081 that is below 1.0.

These calculated health risk results suggest that potential vapor intrusion VOC impacts from residual VOC chemicals in shallow soils are not anticipated to be a significant threat to indoor air quality and will not pose an elevated health risk to the Subject Site occupants, workers, or public for any commercial retail use. The Subject Site is a low environmental vapor intrusion risk site, and the vapor intrusion assessment results suggest that the Subject Site present environmental conditions are acceptable and safe for the current or future commercial retail use.

7.3 Soil Gas Evaluation and Conclusions for Future Residential Use

The soil vapor analytical VOC data obtained from shallow subsurface soil gas samples collected from the Subject Site in the vicinity of the current building structure were found to be below laboratory reporting limits for all commercial VOCs, except for slightly elevated levels of benzene, toluene and ethylbenzene, of which benzene and ethylbenzene are constituents of cancer health risk concern, requiring further health risk evaluation for the future residential use of the Subject Site.

The shallow soil gas subsurface benzene and ethylbenzene auto parts-cleaning solvent concentrations, ranging up to a maximum of 0.035 ug/L, and 0.257 ug/L respectively in shallow soils are at or below the DTSC published “no health risk” and *de minimis* health risk benchmark conservative soil gas screening level concentrations for future residential use of 0.097 ug/L, and 1.10 ug/L, respectively, based on the most conservative published vapor intrusion attenuation factor of 0.001.

All these shallow soil gas VOC concentrations are tabulated in Table 3 above. These results are well below the acceptable commercial DTSC Vapor Intrusion Soil Gas Screening Levels allowable for “no health risk” levels of 1.0x10⁻⁰⁶ to the residents and public as tabulated in Table 3 above and determined in Table 5 below for onsite vapor intrusion.

To further evaluate the total Subject Site vapor intrusion for future residential use, the following site cumulative indoor air quality health cancer risk was calculated for all of the VOCs detected beneath the Subject Site to confirm the safe and suitability of the Subject Site for residential use.

**Table 5: Calculated Cumulative Indoor Air VI Health Risk Assessment
for Planned Future Residential Redevelopment Use**

Constituents	Maximum SSG Concentration, ug/L	CalEPA 1.0×10^{-6} SG Screening Level	Calculated Cancer Risk	Calculated Non-Cancer Risk
Benzene	0.035	0.097	0.361×10^{-6}	0.011
Toluene	0.264	NA	0.000×10^{-6}	0.001
Ethylbenzene	0.257	1.1	0.234×10^{-6}	0.000
Total Cumulative Risk for Future Residential Use @ AF = 0.001			0.595×10^{-6}	0.012

Note: NA – no published cancer risk screening levels

For preliminary future planning purposes, the total site cumulative cancer vapor intrusion health risk estimates for future residential development use at the Subject Site, based on the maximum detected shallow soil gas data and a vapor intrusion (VI) attenuation factor of 0.001, was calculated to be 0.595×10^{-6} that is less than the acceptable “no risk” or *de minimis* health risk of 1.0×10^{-6} and a hazard quotient of 0.012 that is below 1.0.

These calculated health risk results suggest that potential vapor intrusion VOC impacts from residual VOC chemicals in shallow soils are not anticipated to be a significant threat to indoor air quality and will not pose an elevated health risk to the Subject Site occupants, workers, or public for any residential new development in the future. The Subject Site is a low environmental vapor intrusion risk site, and the vapor intrusion assessment results suggest that the Subject Site present environmental conditions are acceptable and safe for the future residential redevelopment use purposes.

8.0 Phase II ESA ADDENDUM CONCLUSIONS AND RECOMMENDATIONS

8.1 Conclusions

ENCON conducted a site inspection on July 11, 2024 by Mr. G. Joseph Scatoloni, Registered Environmental Professional, and verified that the current Hertz Rent-a-Car site conditions have not functionally or operationally changed from general automotive rental service and car wash operations and employ good housekeeping standards with no indications of chemical spills and leak surface staining. The Subject Site was confirmed by ENCON staff to have essentially the same operations at this time as those present in May 2022, as shown in the current site photos, provided in Attachment A for reference.

For current commercial use purposes, the total site cumulative cancer vapor intrusion health risk estimates for current or future commercial development uses at the Subject Site, based on the maximum detected shallow soil gas data and a vapor intrusion (VI) attenuation factor of 0.03, was calculated to be 0.410×10^{-05} which is less than the acceptable “no significant risk” or low health risk of 1.0×10^{-05} and a hazard quotient of 0.081 that is below 1.0. These calculated health risk results suggest that potential vapor intrusion VOC impacts from residual VOC chemicals in shallow soils are not anticipated to be a significant threat to indoor air quality and will not pose an elevated health risk to the Subject Site occupants, workers, or public for any commercial retail use. The Subject Site is a low environmental vapor intrusion risk site, and the vapor intrusion assessment results suggest that the Subject Site present environmental conditions are acceptable and safe for the current or future commercial retail use.

For preliminary future residential use planning purposes, the total site cumulative cancer vapor intrusion health risk estimates for future residential development use at the Subject Site, based on the maximum detected shallow soil gas data and a vapor intrusion (VI) attenuation factor of 0.001, was calculated to be 0.595×10^{-06} that is less than the acceptable “no risk” or *de minimis* health risk of 1.0×10^{-06} and a hazard quotient of 0.012 that is below 1.0. These calculated health risk results suggest that potential vapor intrusion VOC impacts from residual VOC chemicals in shallow soils are not anticipated to be a significant threat to indoor air quality and will not pose an elevated health risk to the Subject Site occupants, workers, or public for any residential new development in the future. The Subject Site is a low environmental vapor intrusion risk site, and the vapor intrusion assessment results suggest that the Subject Site present site environmental conditions are acceptable and safe for the future residential redevelopment use purposes.

8.2 Recommendations

Based on the Phase II ESA Soil and Soil Gas Investigation findings and evaluations, the Subject Site can be classified as a low environmental risk site that poses no significant threat to the environment or State groundwater beneath the Subject Site, or to the occupants and public health at this time for the current commercial retail use. The calculated health risk results suggest that potential vapor intrusion VOC impacts from residual VOCs and BTEX chemicals in shallow soils are not anticipated to be a significant threat to indoor air quality and will not pose an elevated health risk to the Subject Site occupants, workers or public at this time for the current commercial use or the future planned residential redevelopment use. The soil and soil gas results suggest that no further Phase II ESA site assessment investigations or targeted soil mitigation tasks are warranted beneath the Subject Site property at this time.

If, in the future, the Subject Site is used or redeveloped for commercial or residential or more public service sensitive use purposes, the calculated health risk results suggest that potential vapor intrusion VOC impacts from VOC and BTEX chemicals in shallow soils are not anticipated to be a significant threat to indoor air quality and should not pose an elevated health risk to the Subject Site occupants, workers, or the public.

However, although the Subject Site is a low environmental vapor intrusion risk site and the vapor intrusion assessment results suggest that the Subject Site present site environmental conditions are within manageable and *de minimis* health risk range for any future commercial or residential planning and development purposes, the following vapor intrusion administrative and engineering controls are suggested to be evaluated and implemented in the grading and foundation plan.

In future redevelopment projects, the following recommendations should be evaluated and implemented: 1) the design and installation of proper administrative and engineering controls, such as; vapor barrier 60 mil HDPE liner and elevated ventilation rates to address any residual VOC vapor pockets or seasonal variations in soil vapors beneath the new building structure in the future and; 2) using a Soil Management Plan (SMP) during new construction site grading activities to properly manage and control all environmental conditions encountered during the new construction.

9.0 REPORT CONDITIONS AND LIMITATIONS

ENCON Technologies, Inc., Environmental & Engineering Services (ENCON) was retained by 361 North La Brea LLC, Project Client, to perform a Phase II Environmental Site Assessment Addendum for the Hertz Car Rental commercial property located at 361 North La Brea Avenue in Los Angeles, California (Subject Site) for the exclusive use of the Property Owner for land redevelopment planning purposes.

The Phase II ESA conclusions and recommendations presented in this report were based upon the soil and soil gas investigation performed by ENCON Technologies, Inc. in May 2022 and the findings and conclusions/recommendations were made in accordance with the ASTM E1739-15 site environmental risk assessment as well as the regulatory guidelines: The DTSC HERO issued regulatory update, Human Health Risk Assessment (HRA) Note No. 3 in June 2020 and the CalEPA DTSC Vapor Intrusion Screening and Evaluating Supplemental Guidance Document, dated February 2020, Step 4.

The consultant makes no guarantees as to the accuracy or completeness of information obtained from others. It is possible that information exists beyond the scope of this investigation. Additional information which was not made available to the Consultant at the time of conducting the ESA investigation and authoring the Report may result in a modification of the conclusions and recommendations presented.


The Services performed by the Consultant have been conducted in a manner consistent with the level of care ordinarily exercised by members of our profession currently practicing under similar conditions. This report is not a legal opinion but may under certain circumstances be prepared at the direction of counsel, may be in anticipation of litigation, and may be classified as an attorney client communication or as an attorney-work product.

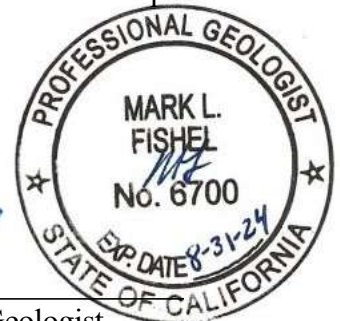
The findings in this report are based on field observations and analytical data provided by an independent laboratory. Interpretations of the subsurface conditions at the site were made from these observations and data. Subsurface conditions may vary from these data points.

If there are any questions regarding soil sample collection or soil analysis, please contact Joseph Scatoloni, Project Manager at (562) 777-2200.

Respectfully submitted by,
ENCON Technologies, Inc.


G. Joseph Scatoloni, ENCON Principal
Senior Environmental Project Manager


Mark Fishel, ENCON Senior Geologist
California Professional Geologist #6700



ENCON

ATTACHMENTS:

Attachment A Current Site Photos



Photo #1: Exterior of the Subject Site car rental administrative building.



Photo #4: Car washing area at the Subject Site.



Photo #2: Fenced rental car lot at the Subject Site.



Photo #5: Car washing area at the Subject Site.



Photo #3: Rental car parking area at the Subject Site.



Photo #6: Car washing equipment at the Subject Site.



Photo #7: Interior of rental car office at the Subject Site.



Photo #10: Off-site commercial operations viewed north from the Subject Site.

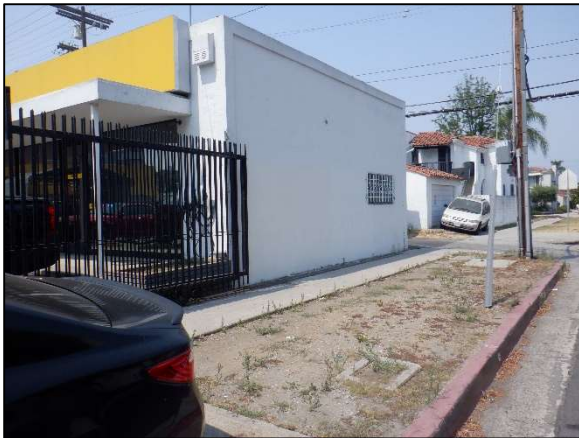


Photo #8: Northern site boundary.



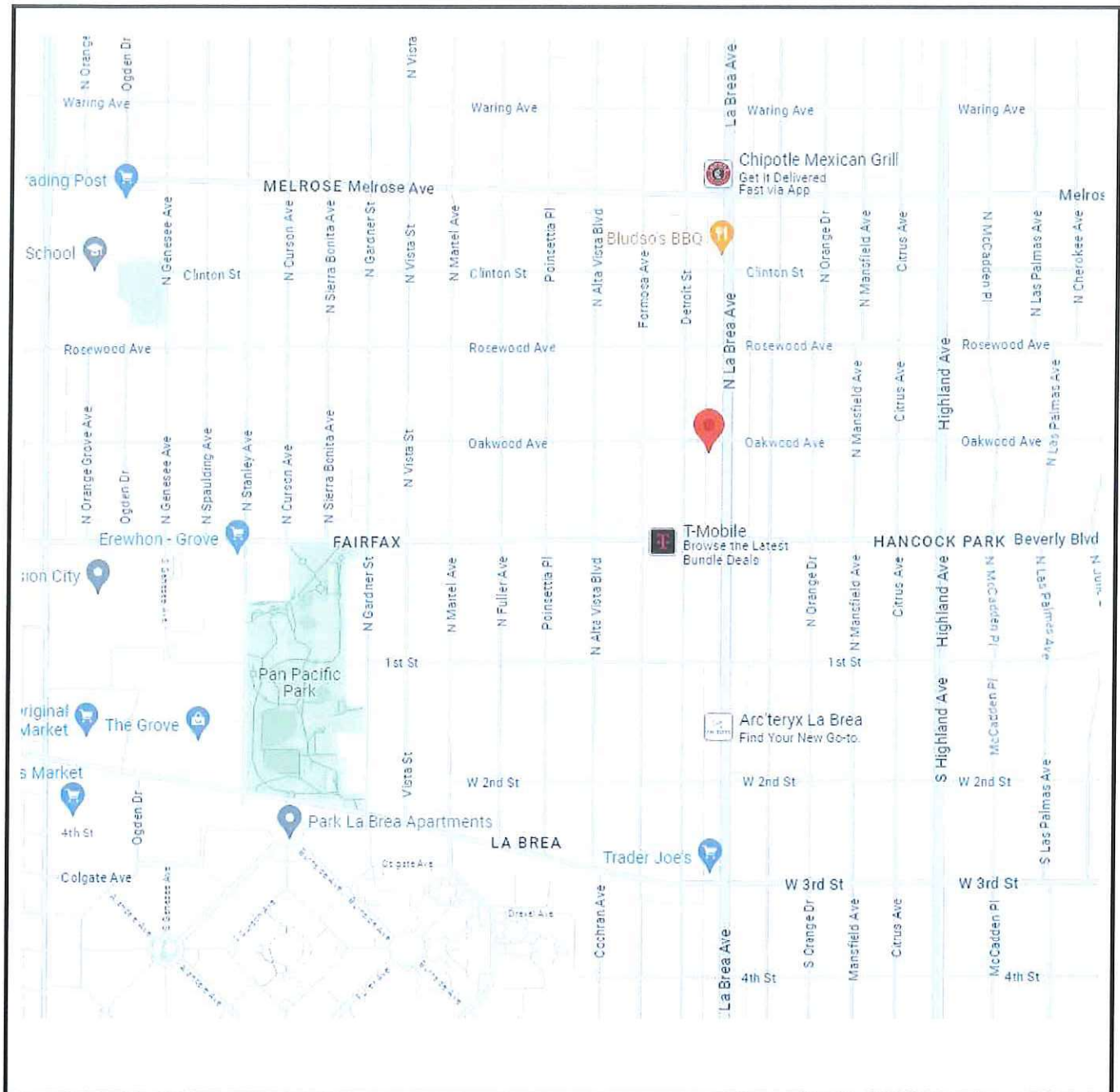
Photo #11: Off-site commercial operations viewed east from the Subject Site.



Photo #9: Rear alley access located to the west of the Subject Site.

FIGURES:

- | | |
|----------|----------------------------------|
| Figure 1 | Site Vicinity Map |
| Figure 2 | Site Map with Sampling Locations |



ENCON
Technologies, Inc.



12145 Mora Drive, Suite 7
Santa Fe Springs, CA 90670

Site Location Map

**361 North La Brea Avenue
Los Angeles, California**

LEGEND

↑ North

Scale: N/A

July 16, 2024

FIGURE 1

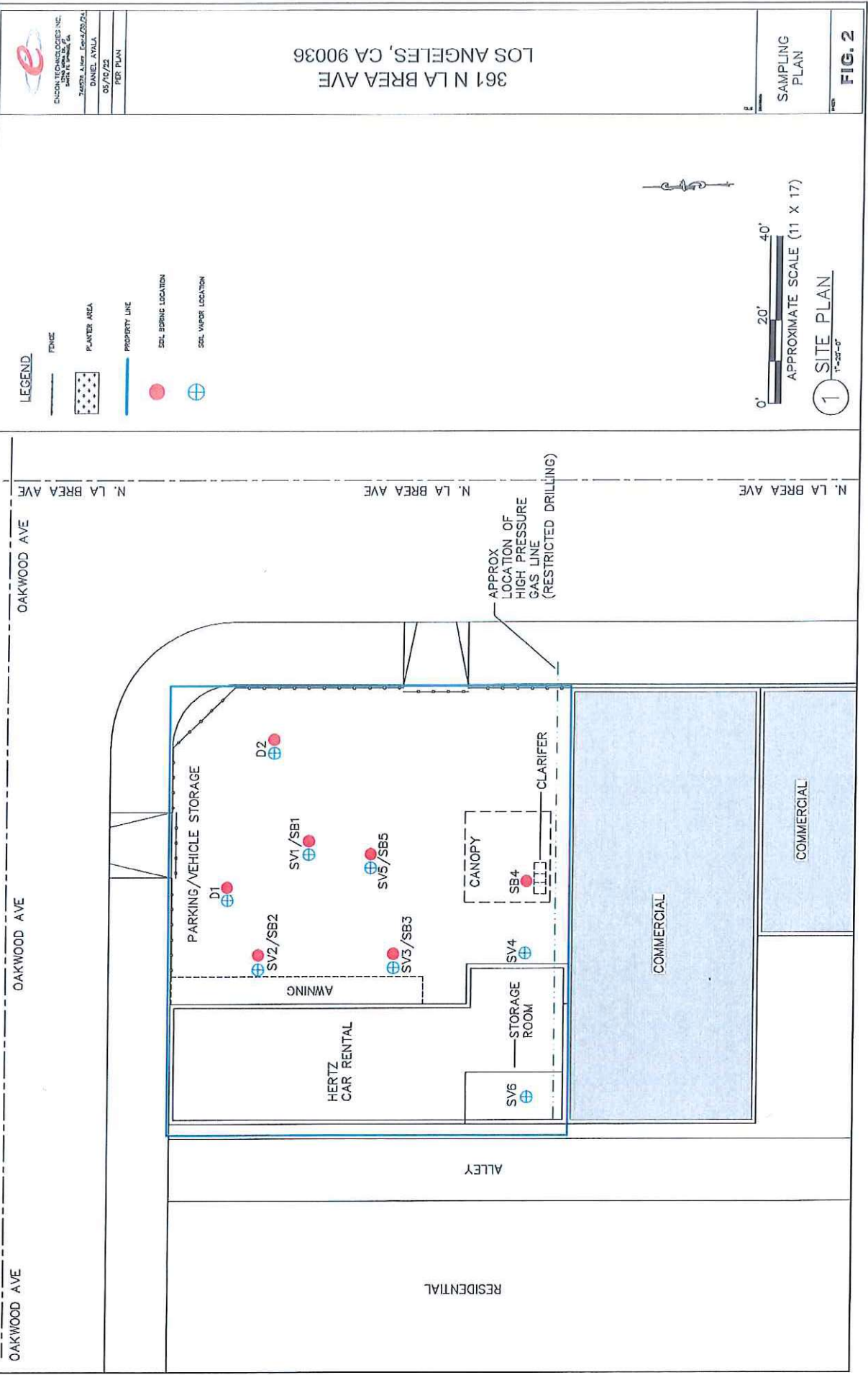


Exhibit A

Soil Analytical Laboratory Reports – May 2022



714-449-9937
562-646-1611

11007 FOREST PLACE
SANTA FE SPRINGS, CA 90670
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**JONES ENVIRONMENTAL
LABORATORY RESULTS**

Client: Encon Technologies, Inc.
Client Address: 12145 Mora Dr, Suite 7
Santa Fe Springs, CA

Report date: 5/17/2022
Jones Ref. No.: ST-19776

Attn: Joe Scatoloni

Date Sampled: 5/15/2022
Date Received: 5/16/2022

Project: N. La Brea PH. II ESA
Project Address: 361 N. La Brea Ave.
Los Angeles, CA 90036

Date Analyzed: 5/16/2022
Physical State: Soil

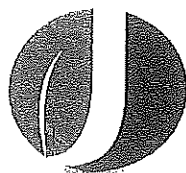
ANALYSES REQUESTED

Soil:

1. EPA 8015M – Extended Range Hydrocarbons
2. EPA 8260B by 5035 – Volatile Organics by GC/MS + Oxygenates/Gasoline Range Organics

Approval:

Annalise O'Toole, M.S.
Mobile Lab Technical Manager



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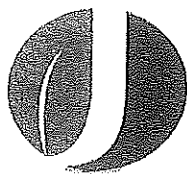
Project: N. La Brea PH. II ESA
Project Address: 361 N. La Brea Ave.
Los Angeles, CA 90036

Date Analyzed: 5/16/2022
Physical State: Soil

EPA 8015M - Extended Range Hydrocarbons

<u>Sample ID:</u>	SB4-5'	SB3-5'	SB2-5'	SB1-5'		
<u>Jones ID:</u>	ST-19776-01	ST-19776-02	ST-19776-03	ST-19776-04	<u>Reporting Limit</u>	<u>Units</u>
Carbon Chain Range						
C23 - C40	ND	ND	ND	ND	10.0	mg/kg
<u>Dilution Factor</u>	1	1	1	1		
<u>Surrogate Recovery:</u>					<u>QC Limits</u>	
Hexacosane	84%	95%	89%	104%	50 - 140	
<u>Batch:</u>	FID7_ 051622_01	FID7_ 051622_01	FID7_ 051622_01	FID7_ 051622_01		

ND = Value less than reporting limit



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JONES ENVIRONMENTAL QUALITY CONTROL INFORMATION

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Report date: 5/17/2022
Jones Ref. No.: ST-19776

Attn: Joe Scatoloni

Date Sampled: 5/15/2022
Date Received: 5/16/2022
Date Analyzed: 5/16/2022
Physical State: Soil

Project: N. La Brea PH. II ESA
Project Address: 361 N. La Brea Ave.
Los Angeles, CA 90036

EPA 8015M - Extended Range Hydrocarbons

Sample ID: METHOD
BLANK #1
Jones ID: MB1-
051622FID7

Reporting Limit **Units**

Carbon Chain Range

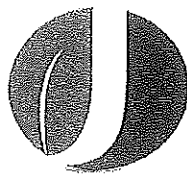
C23 - C40 ND 10.0 mg/kg

Dilution Factor 1

Surrogate Recovery: **QC Limits**
Hexacosane 119% 50 - 140

Batch: FID7_
051622_01

ND = Value less than reporting limit



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Report date: 5/17/2022
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Attn: Joe Scatoloni

Date Sampled: 5/15/2022
Date Received: 5/16/2022

Project: N, La Brea PH. II ESA
Project Address: 361 N. La Brea Ave.
Los Angeles, CA 90036

Date Analyzed: 5/16/2022
Physical State: Soil

BATCH: FID7_051622_01 **Prepared:** 5/16/2022 **Analyzed:** 5/16/2022

EPA 8015M - Extended Range Hydrocarbons

	Result	Spike Level	% Recovery	% RPD	% Recovery Limits	Units
LCS:	LCS1-051622FID7	SAMPLE SPIKED:	CLEAN SOIL			
Analyte:						
Diesel (C10 - C28)	480	500	96%		60 - 140	mg/kg
Surrogate Recovery:						
Hexacosane			122%		50 - 140	
LCSD:	LCSD1-051622FID7	SAMPLE SPIKED:	CLEAN SOIL			
Analyte:						
Diesel (C10 - C28)	494	500	99%	2.9%	60 - 140	mg/kg
Surrogate Recoveries:						
Hexacosane			120%		50 - 140	
CCV:	CCV1-051622FID7					
Analyte:						
Diesel (C10 - C28)	1160	1000	116%		80 - 120	mg/kg

LCS = Laboratory Control Sample

LCSD = Laboratory Control Sample Duplicate

CCV = Continuing Calibration Verification

RPD = Relative Percent Difference



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JONES ENVIRONMENTAL LABORATORY RESULTS

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Santa Fe Springs, CA

Report date: 5/17/2022
Jones Ref. No.: ST-19776

Attn: Joe Scatoloni

Date Sampled: 5/15/2022
Date Received: 5/16/2022

Project: N. La Brea Ph. II ESA
Project Address: 361 N. La Brea Ave.
Los Angeles, CA 90036

Date Analyzed: 5/16/2022
Physical State: Soil

EPA 8260B by 5035 – Volatile Organics by GC/MS + Oxygenates/Gasoline Range Organics

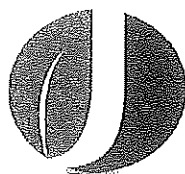
<u>Sample ID:</u>	SB4-5'	SB3-5'	SB2-5'	SB1-5'		
<u>Jones ID:</u>	ST-19776-01	ST-19776-02	ST-19776-03	ST-19776-04	<u>Reporting Limit</u>	<u>Units</u>
Analytes:						
Benzene	ND	ND	ND	ND	1.0	µg/kg
Bromobenzene	ND	ND	ND	ND	1.0	µg/kg
Bromodichloromethane	ND	ND	ND	ND	1.0	µg/kg
Bromoform	ND	ND	ND	ND	1.0	µg/kg
n-Butylbenzene	ND	ND	ND	ND	1.0	µg/kg
sec-Butylbenzene	ND	ND	ND	ND	1.0	µg/kg
tert-Butylbenzene	ND	ND	ND	ND	1.0	µg/kg
Carbon tetrachloride	ND	ND	ND	ND	1.0	µg/kg
Chlorobenzene	ND	ND	ND	ND	1.0	µg/kg
Chloroform	ND	ND	ND	ND	1.0	µg/kg
2-Chlorotoluene	ND	ND	ND	ND	1.0	µg/kg
4-Chlorotoluene	ND	ND	ND	ND	1.0	µg/kg
Dibromochloromethane	ND	ND	ND	ND	1.0	µg/kg
1,2-Dibromo-3-chloropropane	ND	ND	ND	ND	1.0	µg/kg
1,2-Dibromoethane (EDB)	ND	ND	ND	ND	1.0	µg/kg
Dibromomethane	ND	ND	ND	ND	1.0	µg/kg
1,2-Dichlorobenzene	ND	ND	ND	ND	1.0	µg/kg
1,3-Dichlorobenzene	ND	ND	ND	ND	1.0	µg/kg
1,4-Dichlorobenzene	ND	ND	ND	ND	1.0	µg/kg
1,1-Dichloroethane	ND	ND	ND	ND	1.0	µg/kg
1,2-Dichloroethane	ND	ND	ND	ND	1.0	µg/kg
1,1-Dichloroethene	ND	ND	ND	ND	1.0	µg/kg
cis-1,2-Dichloroethene	ND	ND	ND	ND	1.0	µg/kg
trans-1,2-Dichloroethene	ND	ND	ND	ND	1.0	µg/kg
1,2-Dichloropropane	ND	ND	ND	ND	1.0	µg/kg
1,3-Dichloropropane	ND	ND	ND	ND	1.0	µg/kg
2,2-Dichloropropane	ND	ND	ND	ND	1.0	µg/kg
1,1-Dichloropropene	ND	ND	ND	ND	1.0	µg/kg
cis-1,3-Dichloropropene	ND	ND	ND	ND	1.0	µg/kg

JONES ENVIRONMENTAL LABORATORY RESULTS

EPA 8260B by 5035 – Volatile Organics by GC/MS + Oxygenates/Gasoline Range Organics

<u>Sample ID:</u>	SB4-5'	SB3-5'	SB2-5'	SB1-5'		
<u>Jones ID:</u>	ST-19776-01	ST-19776-02	ST-19776-03	ST-19776-04	<u>Reporting Limit</u>	<u>Units</u>
Analytes:						
trans-1,3-Dichloropropene	ND	ND	ND	ND	1.0	µg/kg
Ethylbenzene	ND	ND	ND	ND	1.0	µg/kg
Freon 11	ND	ND	ND	ND	5.0	µg/kg
Freon 12	ND	ND	ND	ND	5.0	µg/kg
Freon 113	ND	ND	ND	ND	5.0	µg/kg
Hexachlorobutadiene	ND	ND	ND	ND	1.0	µg/kg
Isopropylbenzene	ND	ND	ND	ND	1.0	µg/kg
4-Isopropyltoluene	ND	ND	ND	ND	1.0	µg/kg
Methylene chloride	ND	ND	ND	ND	1.0	µg/kg
Naphthalene	ND	ND	ND	ND	5.0	µg/kg
n-Propylbenzene	ND	ND	ND	ND	1.0	µg/kg
Styrene	ND	ND	ND	ND	1.0	µg/kg
1,1,1,2-Tetrachloroethane	ND	ND	ND	ND	1.0	µg/kg
1,1,2,2-Tetrachloroethane	ND	ND	ND	ND	1.0	µg/kg
Tetrachloroethene	ND	ND	ND	ND	1.0	µg/kg
Toluene	ND	ND	ND	ND	1.0	µg/kg
1,2,3-Trichlorobenzene	ND	ND	ND	ND	1.0	µg/kg
1,2,4-Trichlorobenzene	ND	ND	ND	ND	1.0	µg/kg
1,1,1-Trichloroethane	ND	ND	ND	ND	1.0	µg/kg
1,1,2-Trichloroethane	ND	ND	ND	ND	1.0	µg/kg
Trichloroethene	ND	ND	ND	ND	1.0	µg/kg
1,2,3-Trichloropropane	ND	ND	ND	ND	1.0	µg/kg
1,2,4-Trimethylbenzene	ND	ND	ND	ND	1.0	µg/kg
1,3,5-Trimethylbenzene	ND	ND	ND	ND	1.0	µg/kg
Vinyl chloride	ND	ND	ND	ND	1.0	µg/kg
m,p-Xylene	ND	ND	ND	ND	2.0	µg/kg
o-Xylene	ND	ND	ND	ND	1.0	µg/kg
Methyl-tert-butylether	ND	ND	ND	ND	5.0	µg/kg
Ethyl-tert-butylether	ND	ND	ND	ND	5.0	µg/kg
Di-isopropylether	ND	ND	ND	ND	5.0	µg/kg
tert-amylmethylether	ND	ND	ND	ND	5.0	µg/kg
tert-Butylalcohol	ND	ND	ND	ND	50.0	µg/kg
<u>Dilution Factor:</u>	1	1	1	1		
<u>Surrogate Recoveries:</u>					<u>QC Limits</u>	
Dibromofluoromethane	91%	91%	95%	95%	60 - 140	
Toluene-d ₈	83%	90%	95%	94%	60 - 140	
4-Bromofluorobenzene	118%	97%	87%	86%	60 - 140	
<u>Batch:</u>	VOC5-051622-01	VOC5-051622-01	VOC5-051622-01	VOC5-051622-01		

ND = Value less than reporting limit



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JONES ENVIRONMENTAL LABORATORY RESULTS

Client: Encon Technologies, Inc.
Client Address: 12145 Mora Dr, Suite 7
Santa Fe Springs, CA

Report date: 5/17/2022
Jones Ref. No.: ST-19776

Attn: Joe Scatoloni
Project: N. La Brea Ph. II ESA
Project Address: 361 N. La Brea Ave.
Los Angeles, CA 90036

Date Sampled: 5/15/2022
Date Received: 5/16/2022
Date Analyzed: 5/16/2022
Physical State: Soil

EPA 8260B by 5035 – Volatile Organics by GC/MS + Oxygenates/Gasoline Range Organics

<u>Sample ID:</u>	<u>METHOD</u>		
	BLANK #1		
Jones ID:	051622- V5MB1	<u>Reporting Limit</u>	<u>Units</u>
Analytes:			
Benzene	ND	1.0	µg/kg
Bromobenzene	ND	1.0	µg/kg
Bromodichloromethane	ND	1.0	µg/kg
Bromoform	ND	1.0	µg/kg
n-Butylbenzene	ND	1.0	µg/kg
sec-Butylbenzene	ND	1.0	µg/kg
tert-Butylbenzene	ND	1.0	µg/kg
Carbon tetrachloride	ND	1.0	µg/kg
Chlorobenzene	ND	1.0	µg/kg
Chloroform	ND	1.0	µg/kg
2-Chlorotoluene	ND	1.0	µg/kg
4-Chlorotoluene	ND	1.0	µg/kg
Dibromochloromethane	ND	1.0	µg/kg
1,2-Dibromo-3-chloropropane	ND	1.0	µg/kg
1,2-Dibromoethane (EDB)	ND	1.0	µg/kg
Dibromomethane	ND	1.0	µg/kg
1,2-Dichlorobenzene	ND	1.0	µg/kg
1,3-Dichlorobenzene	ND	1.0	µg/kg
1,4-Dichlorobenzene	ND	1.0	µg/kg
1,1-Dichloroethane	ND	1.0	µg/kg
1,2-Dichloroethane	ND	1.0	µg/kg
1,1-Dichloroethene	ND	1.0	µg/kg
cis-1,2-Dichloroethene	ND	1.0	µg/kg
trans-1,2-Dichloroethene	ND	1.0	µg/kg
1,2-Dichloropropane	ND	1.0	µg/kg
1,3-Dichloropropane	ND	1.0	µg/kg
2,2-Dichloropropane	ND	1.0	µg/kg
1,1-Dichloropropene	ND	1.0	µg/kg
cis-1,3-Dichloropropene	ND	1.0	µg/kg

JONES ENVIRONMENTAL LABORATORY RESULTS

EPA 8260B by 5035 – Volatile Organics by GC/MS + Oxygenates/Gasoline Range Organics

<u>Sample ID:</u>	<u>METHOD</u>		
	BLANK #1		
<u>Jones ID:</u>	051622- V5MB1	<u>Reporting Limit</u>	<u>Units</u>
Analytes:			
trans-1,3-Dichloropropene	ND	1.0	µg/kg
Ethylbenzene	ND	1.0	µg/kg
Freon 11	ND	5.0	µg/kg
Freon 12	ND	5.0	µg/kg
Freon 113	ND	5.0	µg/kg
Hexachlorobutadiene	ND	1.0	µg/kg
Isopropylbenzene	ND	1.0	µg/kg
4-Isopropyltoluene	ND	1.0	µg/kg
Methylene chloride	ND	1.0	µg/kg
Naphthalene	ND	5.0	µg/kg
n-Propylbenzene	ND	1.0	µg/kg
Styrene	ND	1.0	µg/kg
1,1,1,2-Tetrachloroethane	ND	1.0	µg/kg
1,1,2,2-Tetrachloroethane	ND	1.0	µg/kg
Tetrachloroethene	ND	1.0	µg/kg
Toluene	ND	1.0	µg/kg
1,2,3-Trichlorobenzene	ND	1.0	µg/kg
1,2,4-Trichlorobenzene	ND	1.0	µg/kg
1,1,1-Trichloroethane	ND	1.0	µg/kg
1,1,2-Trichloroethane	ND	1.0	µg/kg
Trichloroethene	ND	1.0	µg/kg
1,2,3-Trichloropropane	ND	1.0	µg/kg
1,2,4-Trimethylbenzene	ND	1.0	µg/kg
1,3,5-Trimethylbenzene	ND	1.0	µg/kg
Vinyl chloride	ND	1.0	µg/kg
m,p-Xylene	ND	2.0	µg/kg
o-Xylene	ND	1.0	µg/kg
Methyl-tert-butylether	ND	5.0	µg/kg
Ethyl-tert-butylether	ND	5.0	µg/kg
Di-isopropylether	ND	5.0	µg/kg
tert-amylmethylether	ND	5.0	µg/kg
tert-Butylalcohol	ND	50.0	µg/kg

Dilution Factor 1

<u>Surrogate Recoveries:</u>		<u>QC Limits</u>
Dibromofluoromethane	88%	60 - 140
Toluene-d ₈	91%	60 - 140
4-Bromofluorobenzene	86%	60 - 140

Batch: VOC5-051622-01

ND = Value less than reporting limit



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Date Analyzed: 5/16/2022
Physical State: Soil

EPA 8260B by 5035 – Volatile Organics by GC/MS + Oxygenates/Gasoline Range Organics

GC#: VOC5-051622-01						
Jones ID:		051622-V5LCS1	051622-V5LCSD1	051622-V5CCV1		
Parameter	LCS	LCSD	RPD	Acceptability	CCV	Acceptability
	Recovery (%)	Recovery (%)		Range (%)		Range (%)
Vinyl chloride	124%	133%	7%	60 - 140	117%	80 - 120
1,1-Dichloroethene	84%	87%	3.9%	60 - 140	164% ¹	80 - 120
Cis-1,2-Dichloroethene	93%	94%	0.7%	70 - 130	87%	80 - 120
1,1,1-Trichloroethane	85%	93%	9.0%	70 - 130	81%	80 - 120
Benzene	95%	98%	3.6%	70 - 130	98%	80 - 120
Trichloroethene	102%	108%	5.8%	70 - 130	97%	80 - 120
Toluene	98%	118%	18.3%	70 - 130	86%	80 - 120
Tetrachloroethene	104%	111%	6.1%	70 - 130	104%	80 - 120
Chlorobenzene	104%	109%	5.2%	70 - 130	96%	80 - 120
Ethylbenzene	103%	113%	9.5%	70 - 130	92%	80 - 120
1,2,4 Trimethylbenzene	104%	103%	1.8%	70 - 130	97%	80 - 120
Gasoline Range Organics (C4-C12)	100%	108%	7.6%	70 - 130	93%	80 - 120
Surrogate Recovery:						
Dibromofluoromethane	98%	96%		60 - 140	94%	60 - 140
Toluene-d ₈	92%	93%		60 - 140	89%	60 - 140
4-Bromofluorobenzene	94%	86%		60 - 140	102%	60 - 140

¹ = Recovery outside of acceptable limits. LCS/LCSD recoveries and %RPD were within QC limits, therefore data was accepted.

LCS = Laboratory Control Sample

LCSD = Laboratory Control Sample Duplicate

CCV = Continuing Calibration Verification

RPD = Relative Percent Difference; Acceptability range for RPD is ≤ 20%



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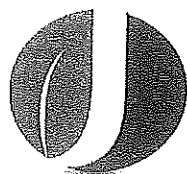
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Physical State: Soil

EPA 8260B by 5035 – Volatile Organics by GC/MS + Oxygenates/Gasoline Range Organics

<u>Sample ID:</u>	SB6-5'	SB6-10'	D2-4'	D1-4'		
<u>Jones ID:</u>	ST-19776-05	ST-19776-06	ST-19776-07	ST-19776-08	<u>Reporting Limit</u>	<u>Units</u>
Analytes:						
Benzene	ND	ND	ND	ND	1.0	µg/kg
Ethylbenzene	ND	ND	ND	ND	1.0	µg/kg
Naphthalene	ND	ND	ND	ND	5.0	µg/kg
Toluene	ND	ND	ND	ND	1.0	µg/kg
m,p-Xylene	ND	ND	ND	ND	2.0	µg/kg
o-Xylene	ND	ND	ND	ND	1.0	µg/kg
Methyl-tert-butylether	ND	ND	ND	ND	5.0	µg/kg
Ethyl-tert-butylether	ND	ND	ND	ND	5.0	µg/kg
Di-isopropylether	ND	ND	ND	ND	5.0	µg/kg
tert-amylmethylether	ND	ND	ND	ND	5.0	µg/kg
tert-Butylalcohol	ND	ND	ND	ND	50.0	µg/kg
Gasoline Range Organics (C4-C12)	ND	ND	ND	ND	0.20	mg/kg
<u>Dilution Factor</u>	1	1	1	1		
<u>Surrogate Recoveries:</u>					<u>QC Limits</u>	
Dibromofluoromethane	94%	95%	96%	96%	60 - 140	
Toluene-d ₈	95%	96%	93%	93%	60 - 140	
4-Bromofluorobenzene	86%	87%	87%	87%	60 - 140	
<u>Batch:</u>	VOC5-051622-01	VOC5-051622-01	VOC5-051622-01	VOC5-051622-01		

ND = Value less than reporting limit



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JONES ENVIRONMENTAL LABORATORY RESULTS

Client: Encon Technologies, Inc.
Client Address: 12145 Mora Dr, Suite 7
Santa Fe Springs, CA

Report date: 5/17/2022
Jones Ref. No.: ST-19776

Attn: Joe Scatoloni

Date Sampled: 5/15/2022

Date Received: 5/16/2022

Project: N. La Brea Ph. II ESA

Date Analyzed: 5/16/2022

Project Address: 361 N. La Brea Ave.
Los Angeles, CA 90036

Physical State: Soil

EPA 8260B by 5035 – Volatile Organics by GC/MS + Oxygenates/Gasoline Range Organics

<u>Sample ID:</u>	<u>METHOD</u>		
	<u>BLANK #1</u>		
<u>Jones ID:</u>	051622- VSMB1	<u>Reporting Limit</u>	<u>Units</u>
<u>Analytes:</u>			
Benzene	ND	1.0	µg/kg
Ethylbenzene	ND	1.0	µg/kg
Naphthalene	ND	5.0	µg/kg
Toluene	ND	1.0	µg/kg
m,p-Xylene	ND	2.0	µg/kg
o-Xylene	ND	1.0	µg/kg
Methyl-tert-butylether	ND	5.0	µg/kg
Ethyl-tert-butylether	ND	5.0	µg/kg
Di-isopropylether	ND	5.0	µg/kg
tert-amylmethylether	ND	5.0	µg/kg
tert-Butylalcohol	ND	50.0	µg/kg
Gasoline Range Organics (C4-C12)	ND	0.20	mg/kg

Dilution Factor 1

Surrogate Recoveries:

Dibromofluoromethane	88%
Toluene-d ₈	91%
4-Bromofluorobenzene	86%

QC Limits

60 - 140
60 - 140
60 - 140

Batch: VOC5-051622-
01

ND = Value less than reporting limit



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JONES ENVIRONMENTAL QUALITY CONTROL INFORMATION

Client: Encon Technologies, Inc.
Client Address: 12145 Mora Dr, Suite 7
Santa Fe Springs, CA

Report date: 5/17/2022
Jones Ref. No.: ST-19776

Attn: Joe Scatoloni
Project: N. La Brea Ph. II ESA
Project Address: 361 N. La Brea Ave.
Los Angeles, CA 90036

Date Sampled: 5/15/2022
Date Received: 5/16/2022
Date Analyzed: 5/16/2022
Physical State: Soil

EPA 8260B by 5035 – Volatile Organics by GC/MS + Oxygenates/Gasoline Range Organics

GC#: VOC5-051622-01						
Jones ID:		051622-V5LCS1	051622-V5LCSD1	051622-V5CCV1		
Parameter	LCS Recovery (%)	LCSD Recovery (%)	RPD	Acceptability Range (%)	CCV	Acceptability Range (%)
Vinyl chloride	124%	133%	6.9%	60 - 140	117%	80 - 120
1,1-Dichloroethene	84%	87%	3.9%	60 - 140	164% ¹	80 - 120
Cis-1,2-Dichloroethene	93%	94%	0.7%	70 - 130	87%	80 - 120
1,1,1-Trichloroethane	85%	93%	9.0%	70 - 130	81%	80 - 120
Benzene	95%	98%	3.6%	70 - 130	98%	80 - 120
Trichloroethene	102%	108%	5.8%	70 - 130	97%	80 - 120
Toluene	98%	118%	18.3%	70 - 130	86%	80 - 120
Tetrachloroethene	104%	111%	6.1%	70 - 130	104%	80 - 120
Chlorobenzene	104%	109%	5.2%	70 - 130	96%	80 - 120
Ethylbenzene	103%	113%	9.5%	70 - 130	92%	80 - 120
1,2,4 Trimethylbenzene	104%	103%	1.8%	70 - 130	97%	80 - 120
Gasoline Range Organics (C4-C12)	100%	108%	7.6%	70 - 130	93%	80 - 120
Surrogate Recovery:						
Dibromofluoromethane	98%	96%		60 - 140	94%	60 - 140
Toluene-d ₈	92%	93%		60 - 140	89%	60 - 140
4-Bromofluorobenzene	94%	86%		60 - 140	102%	60 - 140

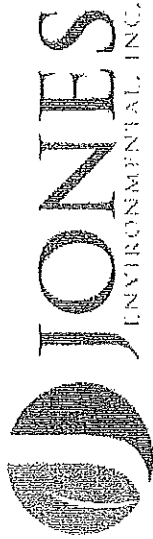
¹ = Recovery outside of acceptable limits. LCS/LCSD recoveries and %RPD were within QC limits, therefore data was accepted.

LCS = Laboratory Control Sample

LCSD = Laboratory Control Sample Duplicate

CCV = Continuing Calibration Verification

RPD = Relative Percent Difference; Acceptability range for RPD is ≤ 20%



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DB

Soil-Gas Chain-of-Custody Record

Client				ENCON TECHNOLOGIES, INC.				Date	5/15/22							
Client Address				12145 MORA DR. STE. 7 SANTA FE SPRINGS, CA 90670				Client Project #								
Project Name				N. LA BREA PH. II ESA				Turn Around Requested								
Project Address				361 N. LA BREA AVE.				<input type="checkbox"/> Immediate Attention-200%								
Los Angeles, CA 90036				Rush 24 Hours-100%												
Report To				JOE SCATOLONI (562) 777-2200				<input type="checkbox"/> Rush 48 Hours-75%								
Email/Phone				encon@encontech.net DAVID BALAZAR				<input type="checkbox"/> Rush 72 Hours-50%								
								<input type="checkbox"/> Rush 96 Hours-25%								
								<input type="checkbox"/> Normal - No Surcharge								
Sample ID				Purge Number	Purge Volume (mL)	Date	Sample Collection Time	Sample Matrix: Soil Gas (SG), Air (A), Material (M)	8260B (Full Scan)	Gasoline-Range Organics 8015 (TPH)	ASTM D1946, Methane/Fixed Gas/H ₂ S	8015 (TPH) / BTEX / OxyS	Number of Containers	Notes & Special Instructions		
SB4-5'						5/15/22	0945	S	X	X			1			
SB3-5'							0955		X	X						
SB2-5'							1015		X	X						
SB1-5'							1030		X	X						
SB6-5'							1040		X	X						
SB6-10'							1045					X				
D2-4'							1120					X				
D1-4'							1145					X				
													8			
Relinquished By (Signature)													Printed Name		DAVID BALAZAR	
Company ENCON													Date		5/16/22	
Relinquished By (Signature)													Printed Name		DAVID BALAZAR	
Company ENCON													Date		5/16/22	
Relinquished By (Signature)													Printed Name		DAVID BALAZAR	
Company ENCON													Date		5/16/22	

LAB USE ONLY

Jones Project # ST-19776

Page 1 of 1

Sample Container: 1

If different than above, see Notes.

Tedlar Hold-Time Requested: ☐ 6 hr (DTSC) ☐ 72 hr (EPA) ☐ 5 Day

Report Options: ☐ EDD ☐ EDF* - 10% Surcharge

*Global ID

Tracer: ☐ n-pentane ☐ n-hexane ☐ n-heptane ☐ Helium ☐ 1,1-DFA

Units: ☐ ug/m³ ☐ ug/L ☐ ppmV

Reporting Limits Requested: ☐ 20 ug/m³ ☐ 8 ug/m³ ☐ ug/m³

Client signature on this Chain of Custody form constitutes acknowledgement that the above analyses have been requested, and the information provided herein is correct and accurate.

ENCON

Exhibit B

Soil Gas Analytical Laboratory Report - May 2022



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JONES ENVIRONMENTAL LABORATORY RESULTS

Client: Encon Technologies, Inc.
Client Address: 12145 Mora Dr. Suite 7
Santa Fe Springs, CA

Report date: 5/16/2022
Jones Ref. No.: ST-19775

Attn: Joe Scatoloni
Project: N. La Brea Ph. II ESA
Project Address: 361 N. La Brea Ave.
Los Angeles, CA 90036

Date Sampled: 5/15/2022
Date Received: 5/16/2022
Date Analyzed: 5/16/2022
Physical State: Soil Gas

EPA 8260B – Volatile Organics by GC/MS + Oxygenates

ANALYSES REQUESTED

1. EPA 8260B – Volatile Organics by GC/MS + Oxygenates

Approval:

Colby Wakeman
QA/QC Manager



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JONES ENVIRONMENTAL LABORATORY RESULTS

Client: Encon Technologies, Inc.
Client Address: 12145 Mora Dr. Suite 7
Santa Fe Springs, CA

Report date: 5/16/2022
Jones Ref. No.: ST-19775

Attn: Joe Scatoloni
Project: N. La Brea Ph. II ESA
Project Address: 361 N. La Brea Ave.
Los Angeles, CA 90036

Date Sampled: 5/15/2022
Date Received: 5/16/2022
Date Analyzed: 5/16/2022
Physical State:

EPA 8260B – Volatile Organics by GC/MS + Oxygenates

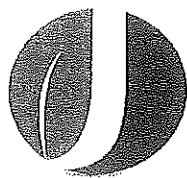
<u>Sample ID:</u>	SV1-5'	SV2-5'	SV3-5'	SV4-5'	SV5-5'		
<u>Jones ID:</u>	ST-19775-01	ST-19775-02	ST-19775-03	ST-19775-04	ST-19775-05	<u>Reporting Limit</u>	<u>Units</u>
Analytes:							
Benzene	ND	ND	0.010	0.021	0.014	0.008	µg/L
Bromobenzene	ND	ND	ND	ND	ND	0.008	µg/L
Bromodichloromethane	ND	ND	ND	ND	ND	0.008	µg/L
Bromoform	ND	ND	ND	ND	ND	0.008	µg/L
n-Butylbenzene	ND	ND	ND	ND	ND	0.012	µg/L
sec-Butylbenzene	ND	ND	ND	ND	ND	0.012	µg/L
tert-Butylbenzene	ND	ND	ND	ND	ND	0.012	µg/L
Carbon tetrachloride	ND	ND	ND	ND	ND	0.008	µg/L
Chlorobenzene	ND	ND	ND	ND	ND	0.008	µg/L
Chloroform	ND	ND	ND	ND	ND	0.008	µg/L
2-Chlorotoluene	ND	ND	ND	ND	ND	0.012	µg/L
4-Chlorotoluene	ND	ND	ND	ND	ND	0.012	µg/L
Dibromochloromethane	ND	ND	ND	ND	ND	0.008	µg/L
1,2-Dibromo-3-chloropropane	ND	ND	ND	ND	ND	0.008	µg/L
1,2-Dibromooethane (EDB)	ND	ND	ND	ND	ND	0.008	µg/L
Dibromomethane	ND	ND	ND	ND	ND	0.008	µg/L
1,2-Dichlorobenzene	ND	ND	ND	ND	ND	0.016	µg/L
1,3-Dichlorobenzene	ND	ND	ND	ND	ND	0.016	µg/L
1,4-Dichlorobenzene	ND	ND	ND	ND	ND	0.016	µg/L
Dichlorodifluoromethane	ND	ND	ND	ND	ND	0.016	µg/L
1,1-Dichloroethane	ND	ND	ND	ND	ND	0.008	µg/L
1,2-Dichloroethane	ND	ND	ND	ND	ND	0.008	µg/L
1,1-Dichloroethene	ND	ND	ND	ND	ND	0.008	µg/L
cis-1,2-Dichloroethene	ND	ND	ND	ND	ND	0.008	µg/L
trans-1,2-Dichloroethene	ND	ND	ND	ND	ND	0.008	µg/L
1,2-Dichloropropane	ND	ND	ND	ND	ND	0.008	µg/L
1,3-Dichloropropane	ND	ND	ND	ND	ND	0.008	µg/L
2,2-Dichloropropane	ND	ND	ND	ND	ND	0.016	µg/L
1,1-Dichloropropene	ND	ND	ND	ND	ND	0.010	µg/L

JONES ENVIRONMENTAL LABORATORY RESULTS

EPA 8260B – Volatile Organics by GC/MS + Oxygenates

<u>Sample ID:</u>	SV1-5'	SV2-5'	SV3-5'	SV4-5'	SV5-5'		
<u>Jones ID:</u>	ST-19775-01	ST-19775-02	ST-19775-03	ST-19775-04	ST-19775-05	<u>Reporting Limit</u>	<u>Units</u>
Analytes:							
cis-1,3-Dichloropropene	ND	ND	ND	ND	ND	0.008	µg/L
trans-1,3-Dichloropropene	ND	ND	ND	ND	ND	0.008	µg/L
Ethylbenzene	0.045	0.009	0.010	0.014	0.020	0.008	µg/L
Freon 113	ND	ND	ND	ND	ND	0.016	µg/L
Hexachlorobutadiene	ND	ND	ND	ND	ND	0.024	µg/L
Isopropylbenzene	ND	ND	ND	ND	ND	0.008	µg/L
4-Isopropyltoluene	0.012	ND	ND	ND	0.008	0.008	µg/L
Methylene chloride	ND	ND	ND	ND	ND	0.008	µg/L
Naphthalene	ND	ND	ND	ND	ND	0.040	µg/L
n-Propylbenzene	ND	ND	ND	ND	ND	0.008	µg/L
Styrene	0.014	ND	ND	ND	0.009	0.008	µg/L
1,1,1,2-Tetrachloroethane	ND	ND	ND	ND	ND	0.008	µg/L
1,1,2,2-Tetrachloroethane	ND	ND	ND	ND	ND	0.016	µg/L
Tetrachloroethene	ND	ND	ND	ND	ND	0.008	µg/L
Toluene	0.152	0.044	0.055	0.088	0.072	0.008	µg/L
1,2,3-Trichlorobenzene	ND	ND	ND	ND	ND	0.016	µg/L
1,2,4-Trichlorobenzene	ND	ND	ND	ND	ND	0.016	µg/L
1,1,1-Trichloroethane	ND	ND	ND	ND	ND	0.008	µg/L
1,1,2-Trichloroethane	ND	ND	ND	ND	ND	0.008	µg/L
Trichloroethene	ND	ND	ND	ND	ND	0.008	µg/L
Trichlorofluoromethane	ND	ND	ND	ND	ND	0.016	µg/L
1,2,3-Trichloropropane	ND	ND	ND	ND	ND	0.008	µg/L
1,2,4-Trimethylbenzene	0.018	ND	ND	ND	0.012	0.008	µg/L
1,3,5-Trimethylbenzene	0.010	ND	ND	ND	nd	0.008	µg/L
Vinyl chloride	ND	ND	ND	ND	ND	0.008	µg/L
m,p-Xylene	0.142	0.033	0.047	0.043	0.066	0.016	µg/L
o-Xylene	0.055	0.013	0.014	0.015	0.021	0.008	µg/L
MTBE	ND	ND	ND	ND	ND	0.040	µg/L
Ethyl-tert-butylether	ND	ND	ND	ND	ND	0.040	µg/L
Di-isopropylether	ND	ND	ND	ND	ND	0.040	µg/L
tert-amylmethylether	ND	ND	ND	ND	ND	0.040	µg/L
tert-Butylalcohol	ND	ND	ND	ND	ND	0.400	µg/L
Tracer:							
Isopropanol	ND	ND	ND	ND	ND	0.080	µg/L
<u>Dilution Factor</u>	1	1	1	1	1		
<u>Surrogate Recoveries:</u>						<u>QC Limits</u>	
Dibromofluoromethane	102%	102%	100%	100%	96%	60 - 140	
Toluene-d ₈	103%	102%	102%	104%	103%	60 - 140	
4-Bromofluorobenzene	91%	91%	92%	93%	91%	60 - 140	
<u>Batch ID:</u>	D2-051622-01	D2-051622-01	D2-051622-01	D2-051622-01	D2-051622-01		

ND = Value below reporting limit



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JONES ENVIRONMENTAL LABORATORY RESULTS

Client: Encon Technologies, Inc.
Client Address: 12145 Mora Dr. Suite 7
Santa Fe Springs, CA

Report date: 5/16/2022
Jones Ref. No.: ST-19775

Attn: Joe Scatoloni
Project: N. La Brea Ph. II ESA
Project Address: 361 N. La Brea Ave.
Los Angeles, CA 90036

Date Sampled: 5/15/2022
Date Received: 5/16/2022
Date Analyzed: 5/16/2022
Physical State:

EPA 8260B – Volatile Organics by GC/MS + Oxygenates

<u>Sample ID:</u>	SV5-12'	D1-4'	D2-4'	SV6-4'		
<u>Jones ID:</u>	ST-19775-06	ST-19775-07	ST-19775-08	ST-19775-09	<u>Reporting Limit</u>	<u>Units</u>
Analytes:						
Benzene	ND	0.009	0.035	0.023	0.008	µg/L
Bromobenzene	ND	ND	ND	ND	0.008	µg/L
Bromodichloromethane	ND	ND	ND	ND	0.008	µg/L
Bromoform	ND	ND	ND	ND	0.008	µg/L
n-Butylbenzene	ND	ND	ND	0.175	0.012	µg/L
sec-Butylbenzene	0.017	ND	ND	0.221	0.012	µg/L
tert-Butylbenzene	ND	ND	ND	ND	0.012	µg/L
Carbon tetrachloride	ND	ND	ND	ND	0.008	µg/L
Chlorobenzene	ND	ND	ND	ND	0.008	µg/L
Chloroform	ND	ND	ND	ND	0.008	µg/L
2-Chlorotoluene	ND	ND	ND	ND	0.012	µg/L
4-Chlorotoluene	ND	ND	ND	ND	0.012	µg/L
Dibromochloromethane	ND	ND	ND	ND	0.008	µg/L
1,2-Dibromo-3-chloropropane	ND	ND	ND	ND	0.008	µg/L
1,2-Dibromoethane (EDB)	ND	ND	ND	ND	0.008	µg/L
Dibromomethane	ND	ND	ND	ND	0.008	µg/L
1,2-Dichlorobenzene	ND	ND	ND	ND	0.016	µg/L
1,3-Dichlorobenzene	ND	ND	ND	ND	0.016	µg/L
1,4-Dichlorobenzene	ND	ND	ND	ND	0.016	µg/L
Dichlorodifluoromethane	0.016	ND	ND	ND	0.016	µg/L
1,1-Dichloroethane	ND	ND	ND	ND	0.008	µg/L
1,2-Dichloroethane	ND	ND	ND	ND	0.008	µg/L
1,1-Dichloroethene	ND	ND	ND	ND	0.008	µg/L
cis-1,2-Dichloroethene	ND	ND	ND	ND	0.008	µg/L
trans-1,2-Dichloroethene	ND	ND	ND	ND	0.008	µg/L
1,2-Dichloropropane	ND	ND	ND	ND	0.008	µg/L
1,3-Dichloropropane	ND	ND	ND	ND	0.008	µg/L
2,2-Dichloropropane	ND	ND	ND	ND	0.016	µg/L
1,1-Dichloropropene	ND	ND	ND	ND	0.010	µg/L

JONES ENVIRONMENTAL LABORATORY RESULTS

EPA 8260B – Volatile Organics by GC/MS + Oxygenates

<u>Sample ID:</u>	SV5-12'	D1-4'	D2-4'	SV6-4'		
<u>Jones ID:</u>	ST-19775-06	ST-19775-07	ST-19775-08	ST-19775-09	<u>Reporting Limit</u>	<u>Units</u>
Analytes:						
cis-1,3-Dichloropropene	ND	ND	ND	ND	0.008	µg/L
trans-1,3-Dichloropropene	ND	ND	ND	ND	0.008	µg/L
Ethylbenzene	0.027	0.025	0.058	0.257	0.008	µg/L
Freon 113	ND	ND	ND	ND	0.016	µg/L
Hexachlorobutadiene	ND	ND	ND	ND	0.024	µg/L
Isopropylbenzene	0.024	0.014	ND	0.203	0.008	µg/L
4-Isopropyltoluene	0.024	0.056	0.017	0.254	0.008	µg/L
Methylene chloride	ND	ND	ND	ND	0.008	µg/L
Naphthalene	ND	ND	ND	ND	0.040	µg/L
n-Propylbenzene	ND	ND	0.009	0.236	0.008	µg/L
Styrene	ND	ND	ND	ND	0.008	µg/L
1,1,1,2-Tetrachloroethane	ND	ND	ND	ND	0.008	µg/L
1,1,2,2-Tetrachloroethane	ND	ND	ND	ND	0.016	µg/L
Tetrachloroethene	ND	ND	ND	ND	0.008	µg/L
Toluene	0.075	0.070	0.264	0.230	0.008	µg/L
1,2,3-Trichlorobenzene	ND	ND	ND	ND	0.016	µg/L
1,2,4-Trichlorobenzene	ND	ND	ND	ND	0.016	µg/L
1,1,1-Trichloroethane	ND	ND	ND	ND	0.008	µg/L
1,1,2-Trichloroethane	ND	ND	ND	ND	0.008	µg/L
Trichloroethene	ND	ND	ND	ND	0.008	µg/L
Trichlorofluoromethane	ND	ND	ND	ND	0.016	µg/L
1,2,3-Trichloropropane	ND	ND	ND	ND	0.008	µg/L
1,2,4-Trimethylbenzene	0.017	0.083	0.022	1.18	0.008	µg/L
1,3,5-Trimethylbenzene	ND	ND	0.011	ND	0.008	µg/L
Vinyl chloride	ND	ND	ND	ND	0.008	µg/L
m,p-Xylene	0.096	ND	0.175	1.71	0.016	µg/L
o-Xylene	0.029	0.032	0.054	0.744	0.008	µg/L
MTBE	ND	ND	ND	ND	0.040	µg/L
Ethyl-tert-butylether	ND	ND	ND	ND	0.040	µg/L
Di-isopropylether	ND	ND	ND	ND	0.040	µg/L
tert-amylmethylether	ND	ND	ND	ND	0.040	µg/L
tert-Butylalcohol	ND	ND	ND	ND	0.400	µg/L
Tracer:						
Isopropanol	ND	ND	ND	ND	0.080	µg/L
<u>Dilution Factor</u>	1	1	1	1		
<u>Surrogate Recoveries:</u>					<u>QC Limits</u>	
Dibromofluoromethane	99%	99%	99%	98%	60 - 140	
Toluene-d ₈	131%	103%	102%	109%	60 - 140	
4-Bromofluorobenzene	101%	104%	92%	108%	60 - 140	
<u>Batch ID:</u>	D2-051622-01	D2-051622-01	D2-051622-01	D2-051622-01		

ND = Value below reporting limit



714-449-9937
562-646-1611

11007 FOREST PLACE
SANTA FE SPRINGS, CA 90670
WWW.JONESENV.COM

JONES ENVIRONMENTAL QUALITY CONTROL INFORMATION

Client: Encon Technologies, Inc.
Client Address: 12145 Mora Dr. Suite 7
Santa Fe Springs, CA

Report date: 5/16/2022
Jones Ref. No.: ST-19775

Attn: Joe Scatoloni
Project: N. La Brea Ph. II ESA
Project Address: 361 N. La Brea Ave.
Los Angeles, CA 90036

Date Sampled: 5/15/2022
Date Received: 5/16/2022
Date Analyzed: 5/16/2022
Physical State:

EPA 8260B – Volatile Organics by GC/MS + Oxygenates

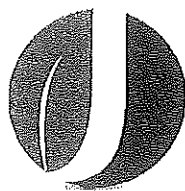
<u>Sample ID:</u>	<u>METHOD</u>	<u>SAMPLING</u>		
	<u>BLANK</u>	<u>BLANK</u>		
<u>Jones ID:</u>	051622- D2MB1	051622- D2SB1	<u>Reporting Limit</u>	<u>Units</u>
Analytes:				
Benzene	ND	ND	0.008	µg/L
Bromobenzene	ND	ND	0.008	µg/L
Bromodichloromethane	ND	ND	0.008	µg/L
Bromoform	ND	ND	0.008	µg/L
n-Butylbenzene	ND	ND	0.012	µg/L
sec-Butylbenzene	ND	ND	0.012	µg/L
tert-Butylbenzene	ND	ND	0.012	µg/L
Carbon tetrachloride	ND	ND	0.008	µg/L
Chlorobenzene	ND	ND	0.008	µg/L
Chloroform	ND	ND	0.008	µg/L
2-Chlorotoluene	ND	ND	0.012	µg/L
4-Chlorotoluene	ND	ND	0.012	µg/L
Dibromochloromethane	ND	ND	0.008	µg/L
1,2-Dibromo-3-chloropropane	ND	ND	0.008	µg/L
1,2-Dibromoethane (EDB)	ND	ND	0.008	µg/L
Dibromomethane	ND	ND	0.008	µg/L
1,2-Dichlorobenzene	ND	ND	0.016	µg/L
1,3-Dichlorobenzene	ND	ND	0.016	µg/L
1,4-Dichlorobenzene	ND	ND	0.016	µg/L
Dichlorodifluoromethane	ND	ND	0.016	µg/L
1,1-Dichloroethane	ND	ND	0.008	µg/L
1,2-Dichloroethane	ND	ND	0.008	µg/L
1,1-Dichloroethene	ND	ND	0.008	µg/L
cis-1,2-Dichloroethene	ND	ND	0.008	µg/L
trans-1,2-Dichloroethene	ND	ND	0.008	µg/L
1,2-Dichloropropane	ND	ND	0.008	µg/L
1,3-Dichloropropane	ND	ND	0.008	µg/L
2,2-Dichloropropane	ND	ND	0.016	µg/L
1,1-Dichloropropene	ND	ND	0.010	µg/L

JONES ENVIRONMENTAL QUALITY CONTROL INFORMATION

EPA 8260B – Volatile Organics by GC/MS + Oxygenates

<u>Sample ID:</u>	METHOD BLANK	SAMPLING BLANK		
<u>Jones ID:</u>	051622- D2MB1	051622- D2SB1	<u>Reporting Limit</u>	<u>Units</u>
Analytes:				
cis-1,3-Dichloropropene	ND	ND	0.008	µg/L
trans-1,3-Dichloropropene	ND	ND	0.008	µg/L
Ethylbenzene	ND	ND	0.008	µg/L
Freon 113	ND	ND	0.016	µg/L
Hexachlorobutadiene	ND	ND	0.024	µg/L
Isopropylbenzene	ND	ND	0.008	µg/L
4-Isopropyltoluene	ND	ND	0.008	µg/L
Methylene chloride	ND	ND	0.008	µg/L
Naphthalene	ND	ND	0.040	µg/L
n-Propylbenzene	ND	ND	0.008	µg/L
Styrene	ND	ND	0.008	µg/L
1,1,1,2-Tetrachloroethane	ND	ND	0.008	µg/L
1,1,2,2-Tetrachloroethane	ND	ND	0.016	µg/L
Tetrachloroethene	ND	ND	0.008	µg/L
Toluene	ND	ND	0.008	µg/L
1,2,3-Trichlorobenzene	ND	ND	0.016	µg/L
1,2,4-Trichlorobenzene	ND	ND	0.016	µg/L
1,1,1-Trichloroethane	ND	ND	0.008	µg/L
1,1,2-Trichloroethane	ND	ND	0.008	µg/L
Trichloroethene	ND	ND	0.008	µg/L
Trichlorofluoromethane	ND	ND	0.016	µg/L
1,2,3-Trichloropropane	ND	ND	0.008	µg/L
1,2,4-Trimethylbenzene	ND	ND	0.008	µg/L
1,3,5-Trimethylbenzene	ND	ND	0.008	µg/L
Vinyl chloride	ND	ND	0.008	µg/L
m,p-Xylene	ND	ND	0.016	µg/L
o-Xylene	ND	ND	0.008	µg/L
MTBE	ND	ND	0.040	µg/L
Ethyl-tert-butylether	ND	ND	0.040	µg/L
Di-isopropylether	ND	ND	0.040	µg/L
tert-amylmethylether	ND	ND	0.040	µg/L
tert-Butylalcohol	ND	ND	0.400	µg/L
Tracer:				
Isopropanol	ND	ND	0.080	µg/L
<u>Dilution Factor</u>	1	1		
<u>Surrogate Recoveries:</u>			<u>QC Limits</u>	
Dibromofluoromethane	103%	100%	60 - 140	
Toluene-d ₈	103%	103%	60 - 140	
4-Bromofluorobenzene	90%	89%	60 - 140	
<u>Batch ID:</u>	D2-051622- 01	D2-051622- 01		

ND = Value below reporting limit



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JONES ENVIRONMENTAL QUALITY CONTROL INFORMATION

Client: Encon Technologies, Inc.
Client Address: 12145 Mora Dr. Suite 7
Santa Fe Springs, CA

Report date: 5/16/2022
Jones Ref. No.: ST-19775

Attn: Joe Scatoloni

Date Sampled: 5/15/2022

Project: N. La Brea Ph. II ESA
Project Address: 361 N. La Brea Ave.
Los Angeles, CA 90036

Date Received: 5/16/2022

Date Analyzed: 5/16/2022

Physical State: Soil Gas

EPA 8260B – Volatile Organics by GC/MS + Oxygenates

Batch ID: D2-051622-01

Jones ID: 051622-D2LCS1 051622-D2LCSD1 051622-D2CCV1

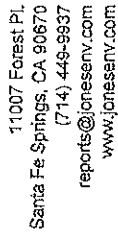
<u>Parameter</u>	LCS Recovery (%)	LCSD Recovery (%)	<u>RPD</u>	Acceptability Range (%)	<u>CCV</u>	Acceptability Range (%)
Vinyl chloride	110%	112%	0.0%	60 - 140	91%	80 - 120
1,1-Dichloroethene	112%	116%	3.5%	60 - 140	95%	80 - 120
Cis-1,2-Dichloroethene	101%	92%	9.6%	70 - 130	100%	80 - 120
1,1,1-Trichloroethane	108%	106%	1.9%	70 - 130	106%	80 - 120
Benzene	114%	110%	3.9%	70 - 130	103%	80 - 120
Trichloroethene	104%	109%	4.5%	70 - 130	103%	80 - 120
Toluene	114%	115%	0.7%	70 - 130	107%	80 - 120
Tetrachloroethene	110%	108%	2.2%	70 - 130	103%	80 - 120
Chlorobenzene	118%	113%	4.5%	70 - 130	113%	80 - 120
Ethylbenzene	102%	100%	1.6%	70 - 130	103%	80 - 120
1,2,4 Trimethylbenzene	97%	97%	0.4%	70 - 130	112%	80 - 120
<u>Surrogate Recovery:</u>						
Dibromofluoromethane	100%	100%		60 - 140	99%	60 - 140
Toluene-d ₈	102%	104%		60 - 140	103%	60 - 140
4-Bromofluorobenzene	93%	96%		60 - 140	97%	60 - 140

LCS = Laboratory Control Sample

LCSD = Laboratory Control Sample Duplicate

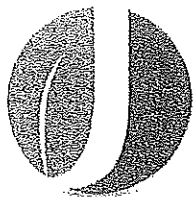
CCV = Continuing Calibration Verification

RPD = Relative Percent Difference; Acceptability range for RPD is ≤ 20%



Soil-Gas Chain-of-Custody Record

Client		ENCON TECHNOLOGIES, INC.		Date	5/15/22	Tedlar Hold-Time Requested: <input type="checkbox"/> 6 hr (DTSC) <input type="checkbox"/> 72 hr (EPA) <input checked="" type="checkbox"/> 5 Day		Report Options EDD _____ EDF - 10% Surcharge _____ *Global ID _____
Client Address		SANTA FE 12145 MORA DR. STE. 7 SPRINGS, CA.		Client Project #				Jones Project # SF-19775
Project Name		N. LA BREA PH. II ESA		Turn Around Requested		Tracer		Page 1 of 1
Project Address		361 N. LA BREA AVE.		<input type="checkbox"/> Immediate Attention-200% <input checked="" type="checkbox"/> Rush 24 Hours-100% <input type="checkbox"/> Rush 48 Hours-75% <input type="checkbox"/> Rush 72 Hours-50% <input type="checkbox"/> Rush 96 Hours-25% <input type="checkbox"/> Normal - No Surcharge		Analysis Requested		Sample Container: TEDLAR
Report To		JOE SCATOLONI (562) 777-2200		Reporting Limits Requested <input type="checkbox"/> 20 ug/m ³ <input type="checkbox"/> 5 ug/m ³ <input type="checkbox"/> ug/m ³ <input checked="" type="checkbox"/> ug/L <input type="checkbox"/> ppmV		Units		If different than above, see Notes.
Email/Phone		encon2encontech.net DAVID BAUTAZAR		Jones ID (Lab Use Only)		Purge Rate (mL/min)		
Sample ID		Purge Number	Purge Volume (mL)	Date	Sample Collection Time	Sample Matrix:		Number of Containers
SV1-5'				5/15/22	1210	Soil Gas (SG), Air (A), Material (M)	8260B	1
SV2-5'					1220	Gasoline Range Organics	X	
SV3-5'					1230	ASTM D1946, Methane/Fixed Gas/H ₂ S	X	
SV4-5'					1240	Magnehelic Vacuum (In/H ₂ O)	X	
SV5-5'					1250		X	
SV5-12'					1300		X	
D1-4'					1310		X	
D2-4'					1320		X	
SV6-6'					1330		X	
Relinquished By (Signature)		DAVID BAUTAZAR		Received By (Signature)		Printed Name		Total Number of Containers
Company	ENCON	Date	5/16/22	Time	0855	Date		
Relinquished By (Signature)		DAVID BAUTAZAR		Received By Laboratory (Signature)		Printed Name		
Company	ENCON	Date	5/16/22	Time	0855	Date		
Relinquished By (Signature)		DAVID BAUTAZAR		Received By Laboratory (Signature)		Printed Name		
Company	ENCON	Date	5/16/22	Time	0855	Date		
Client signature on this Chain of Custody form constitutes acknowledgement that the above analyses have been requested, and the information provided herein is correct and accurate.								



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SAMPLE RECEIPT FORM

Jones ID: ST-19775

CLIENT: ENW

PROJECT: 12145 MORA DR. STE. 7

DATE/TIME (LAB RECEIVED): 5/10/22 855

RECEIVED BY: KL

Delivered by: ☒ Client

☐ Jones Courier

☐ UPS / FedEx / USPS

☐ Other

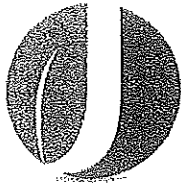
TEMPERATURE:		Thermometer ID: T-1	(Corrected Temp.)	Calibration Due: 08/03/2022	
Temperature Cooler #1	_____ °C ± the CF(-0.5°C)	_____ °C		Blank	Sample
Temperature Cooler #2	_____ °C ± the CF(-0.5°C)	_____ °C		Blank	Sample
Temperature Criteria: 0 ≤ 6°C (NO frozen containers)		Criteria Met?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
If criteria is not met:					
Sample Received on ice?		<input type="checkbox"/> Yes	<input type="checkbox"/> No		
Sample received Chilled on same day of sampling?		<input type="checkbox"/> Yes	<input type="checkbox"/> No		
				Checked By:	<u>N/A</u>
Temperature Non-Conformance (NC):		NC No. _____			
<input type="checkbox"/> Sample not received on ice					
<input type="checkbox"/> sample not received chilled					
<input type="checkbox"/> Sample received chilled, but not on the same day of sampling					

SAMPLE CONDITION:	YES	NO*	N/A
Chain of Custody (COC) received filled out completely	<input checked="" type="checkbox"/>	<input type="checkbox"/> *	<input type="checkbox"/>
Total number of containers received match COC	<input checked="" type="checkbox"/>	<input type="checkbox"/> *	<input type="checkbox"/>
Sample container label(s) consistent with COC	<input type="checkbox"/>	<input checked="" type="checkbox"/> *	<input type="checkbox"/>
Sample container(s) intact and in good condition	<input checked="" type="checkbox"/>	<input type="checkbox"/> *	<input type="checkbox"/>
Proper containers and sufficient volume for analyses requested on COC	<input checked="" type="checkbox"/>	<input type="checkbox"/> *	<input type="checkbox"/>
Proper preservative indicated on COC/container for analyses requested	<input type="checkbox"/>	<input type="checkbox"/> *	<input checked="" type="checkbox"/>
Volatile analysis container(s) free of headspace (EPA 8260 water)	<input type="checkbox"/>	<input type="checkbox"/> *	<input checked="" type="checkbox"/>
Custody Seals Intact on Cooler/Sample	<input type="checkbox"/>	<input type="checkbox"/> *	<input checked="" type="checkbox"/>

CONTAINER TYPE:		
Solid:	Aqueous:	Air / Soil Gas:
5035 Kits: _____	Amber Bottle: _____	Tedlar Bag: <u>8</u>
Glass Jar: _____	VOAs: _____	6 hr
Sleeve: _____	Poly Bottle: _____	72 hr
Other: _____	5030 Kits: _____	<u>5 Day</u>
	Other: _____	Summa:
		(1L) _____ (6L) _____

*Complete Non-Conformance If checked

Checked by: KL



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Non-Conformance ID: ST-19775

Reported By: KL

CHAIN OF CUSTODY (COC):

- | | | |
|--|--|--|
| <input type="checkbox"/> Not relinquished by client | <input type="checkbox"/> COC not received – notify PM | <input type="checkbox"/> No turn around time requested |
| <input type="checkbox"/> No date/time relinquished | <input type="checkbox"/> No tedlar hold time indicated | |
| <input type="checkbox"/> Incomplete information provided | | |
| <input type="checkbox"/> No "Sample ID" entered on COC | <input type="checkbox"/> No matrix indicated | <input type="checkbox"/> # of containers incorrect/missing |
| <input type="checkbox"/> No collection date | <input type="checkbox"/> No collection time | <input type="checkbox"/> No container type indicated |
| <input type="checkbox"/> No analyses requested | <input type="checkbox"/> No preservative indicated | |

SAMPLE CONTAINER/LABELS:

- | | | |
|---|--|---|
| <input checked="" type="checkbox"/> Sample ID on container does not match COC entry | <input type="checkbox"/> Collection Date/Time does not match COC entry | <input type="checkbox"/> Improper container used |
| <input type="checkbox"/> Samples not received but listed on COC | <input type="checkbox"/> Samples received but not listed on COC | <input type="checkbox"/> Holding time expired |
| <input type="checkbox"/> Insufficient quantities for analyses requested | <input type="checkbox"/> Markings/Infor illegible | <input type="checkbox"/> Broken/leaking container |
| <input type="checkbox"/> Headspace present in VOAs | <input type="checkbox"/> Others (see comments) | |

PRESERVATION:

- ☐ Not preserved/Improper preservative used

CUSTODY SEALS:

- ☐ None ☐ Not intact

Comments: On Tedlar, SV6-5! Should be SV5-5!

ENCON

Exhibit C

Geophysical Survey Report

August 2, 2001

Mr. Thomas Borlund III
US Bank
550 Hope Street, Suite 950
Los Angeles, California 90071

RE: **Results of Geophysical Investigation**
361 North La Brea, Los Angeles, California.

Dear Tom:

Beacon Environmental (Beacon) is pleased to provide US Bank with this report of our findings during geophysical investigation of the Subject Site. The purpose of this investigation was to evaluate the potential for the presence of abandoned underground tanks and ancillary piping remaining from previous service station activities at the Subject Site. The investigation included subsurface geophysical exploration by means of electromagnetic induction, magnetometry, and ground-penetrating radar methods.

1.0 BACKGROUND

Beacon recently completed a Phase I Environmental Investigation of the Subject Site. That investigation has revealed potential recognized environmental conditions affecting the Site.

Sanborn map and historical aerial photograph data show the Site was formerly used as a gasoline service station and auto repair facility. This land use is suspected to have ended in the early to mid 1950s. These activities may have resulted in the release of gasoline from the underground tanks (UST), dispensers, or ancillary piping systems. In addition, suspect methane flux may be present, and at least two nearby properties may contribute to environmental liability to the Subject Site.

No record of tank removal has been found by Beacon, as is often the case with older facilities.

Depth to groundwater has not been determined, but is estimated to be about 15 feet, with a possible range of 10 to 40 feet bgs. Since typical UST installations extend to 15 to 20 feet bgs, the former tanks may have been in contact with groundwater.

2.0 SCOPE OF WORK

Beacon subcontracted the geophysical survey to Spectrum Geophysics, San Fernando, California. Two principal methods of investigation were used, depending on the current structures present at the Site. The outdoor, parking lot area was investigated by means of magnetic survey on a 5-foot by 5-foot grid. A portion of the indoor showroom space was investigated by means of ground-penetrating radar. These areas coincide with the open areas mapped on the 1950 Sanborn map of the

Subject Site, and the areas under the former gasoline station, canopy area of the former auto paint shop, and the former small water closet building along the northwest property line.

The depth of investigation varied according to the method used, and was approximately 16 feet for the magnetic survey, and approximately 5 feet for ground-penetrating radar.

Prior to investigating each area, Spectrum used an electromagnetic pipe and cable locator to map shallow utility lines that might interfere with deeper investigation tools. Several utility lines were noted, but they appear to be associated with electrical and plumbing lines for the current building, and not piping associated with former UST systems.

The field work was conducted under the supervision of Mr. Dave Murchison, Registered Geologist.

3.0 Findings

Spectrum found no evidence of USTs or ancillary piping in the current parking lot area of the Subject Site. Beacon is of the opinion that this area was most likely to be the location of the former USTs at the Site. Since the estimated depth of investigation was 16 feet, it is unlikely that any UST's remain in this investigation area.

Ground-penetrating radar investigation of the northern one-third of the Loud and Cool Furniture showroom found one buried target. This target lies at 2 to 3 feet bgs, and is approximately 5 feet wide and 6 feet long. This target is large enough to be a small UST, possibly a waste oil tank. This target is mapped on Figure 3.

The concrete slab overlying the target contains several cut-off 2-inch brass pipes filled with concrete, and a 1-foot square concrete patch. The entire showroom floor shows evidence of former asphalt or vinyl tile floor covering, and stains of the mastic are ubiquitous. The mastic in the area of the target is black, contrasting with the gray mastic observed elsewhere. The area may have been previously used as a restroom, and the observed remnant piping layout is consistent with this use. This possible former use does not explain the target.

It is possible that the current or former owners or tenants may recall the nature and use of the target, and Beacon encourages further investigation into the documented use of the Site to try to determine that nature and use. Use as a UST cannot be ruled out based on our investigation to date.

Reviewing the 1950 Sanborn map of the Site, the target lies roughly equidistant from three former structures: the gas station kiosk, the water closet structure, and the canopy of the auto repair shop. This location supports more than one possible use of the target structure. It may have been a small UST such as a waste oil tank, a small septic tank, a dry well or sump, or a clarifier. Available geophysical tools cannot distinguish between these artifacts.

4.0 Recommendations

Based on the findings of the current investigation and the previous Phase I Environmental Investigation, Beacon recommends the following:

- Soil, soil vapor, and groundwater sampling should be undertaken to assess potential residual contamination at the Site. Beacon presented a proposal for a suitable investigation dated July 24, 2001. The investigation should include two borings adjacent to the target located during this geophysical survey. Laboratory analysis of soil samples adjacent to the target should include EPA 418.1 analysis for Oil and Grease. This would increase investigation costs by approximately \$100.


5.0 Los Angeles UST Regulations

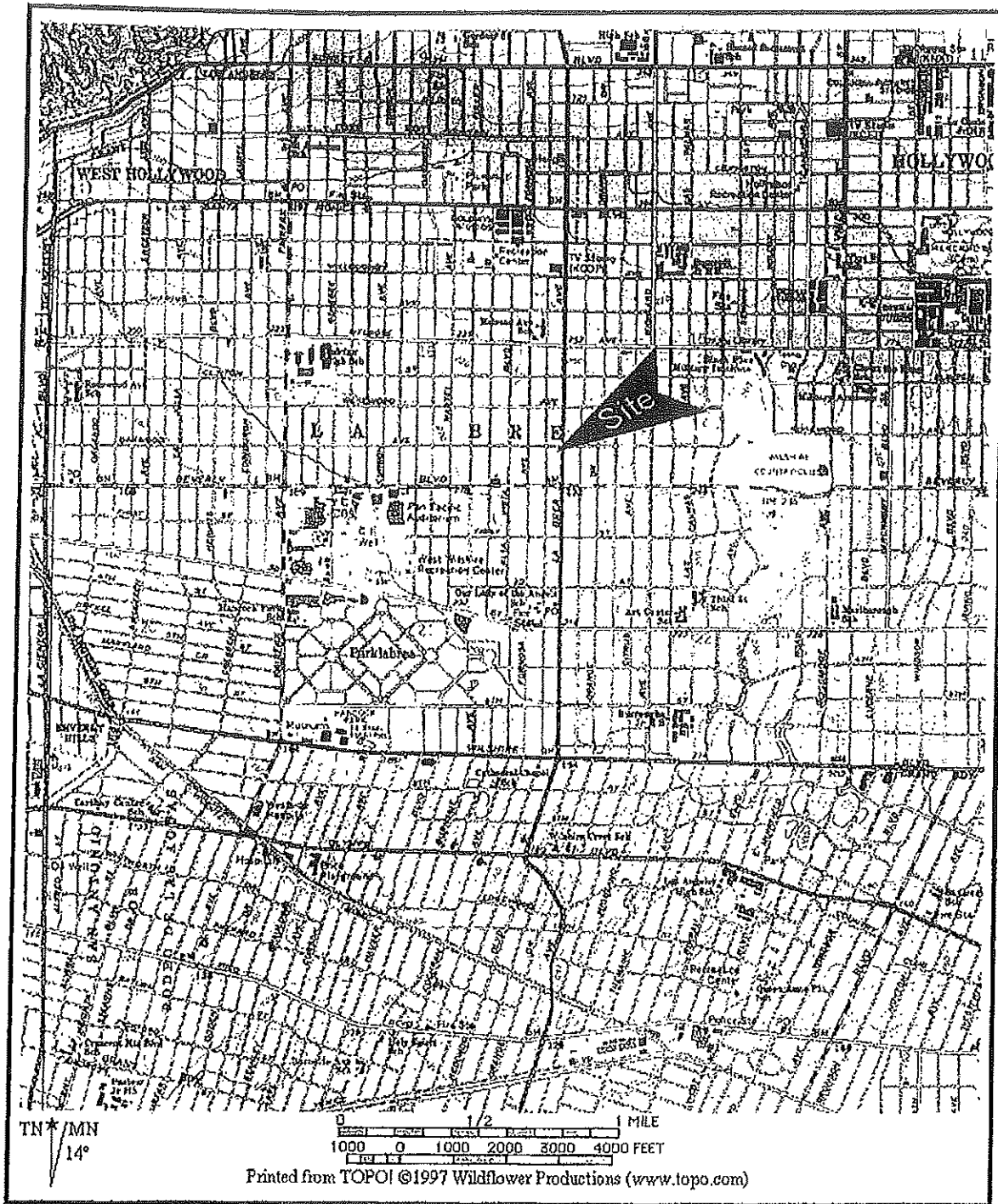
Beacon contacted the Los Angeles Fire Department Hazardous Materials Division office to review the Department policy on old USTs discovered in the City of Los Angeles. The Department requires any UST that has been disused for more than six months to be properly abandoned. If found under a building, the UST can usually be abandoned in place under LAFD supervision. The tanks must be permitted, and the payment of back permit fees and penalties. The tank must be cleaned out, inerted, and filled with an inert substance like sand or concrete slurry. This requires digging down to the tank, cleaning out any residual materials, certification by a Marine Chemist or Industrial Hygienist, backfilling with slurry, and repair of the excavation. Soil samples are required as directed by the LAFD, and are normally taken two feet below the tank bottom, at each end of the tank. Analysis is required for a standard set of contaminants including gasoline, oil and grease, MTBE, total lead, and other analytes as directed by the case officer. The permitting work may take several weeks. The abandonment normally takes about two working days, but may take as long as a week. The cost of this work varies on a case-by-case basis, but is substantial. In Beacon's experience costs in the range of \$20,000 to \$40,000 can be expected if a tank abandonment is required. If substantial contamination is discovered during the abandonment, additional costs are likely to be incurred.

Beacon Environmental appreciates the opportunity to assist you with this project. If you have any questions regarding this proposal, please contact our office at your convenience at (562) 429-5990.

Sincerely,
Beacon Environmental


Dave Murchison
Registered Geologist.


Mark Barwinski, R.E.A.
Partner



BEACON ENVIRONMENTAL

Loud & Cool Furniture

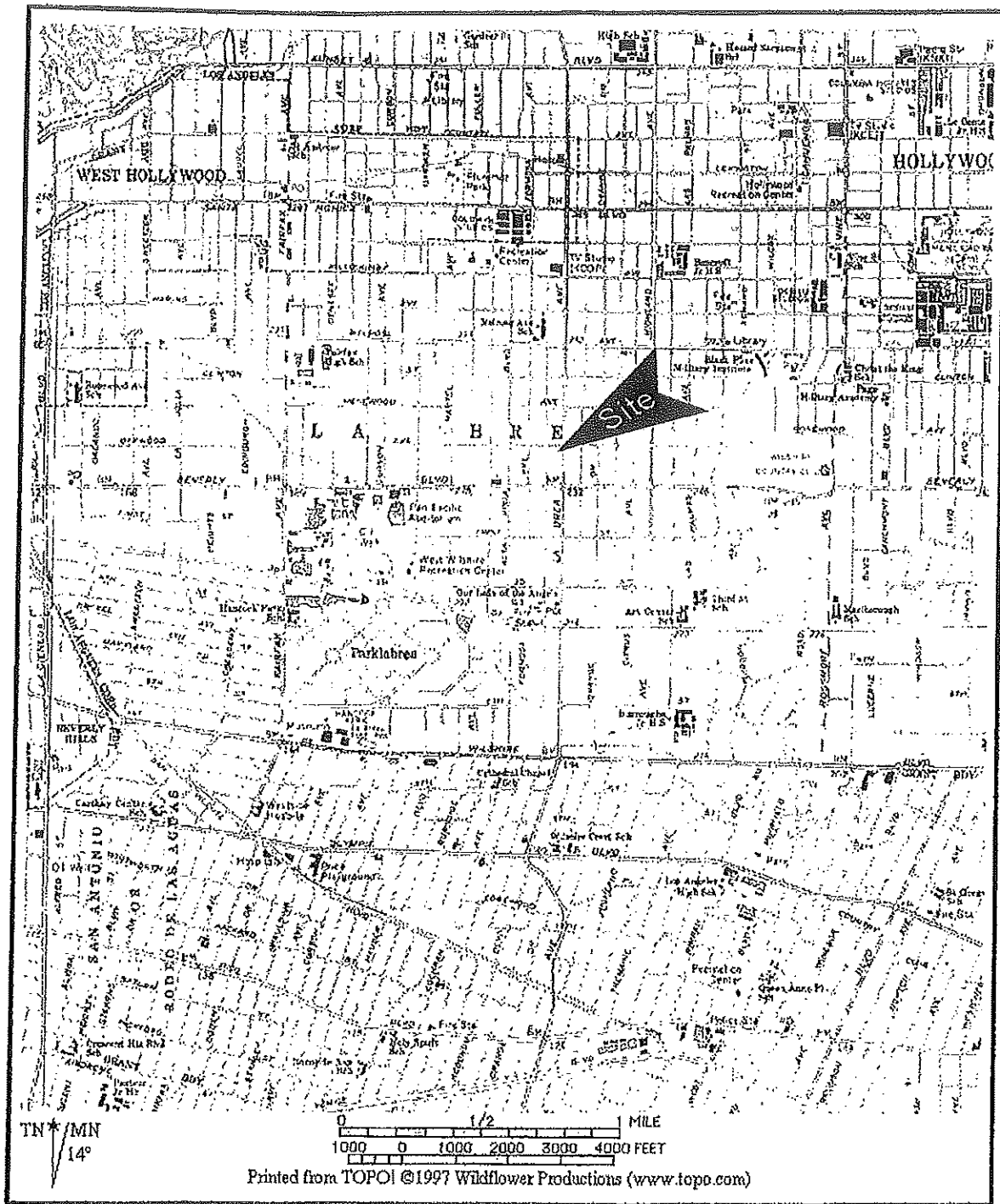
Project: 361 North La Brea Avenue
Los Angeles, California

Figure 1: Site Topographic Map

File No Fig-1 Date: August 2001

Designed by M11

Drawn by J. J. J.



BEACON ENVIRONMENTAL

Loud & Cool Furniture

Project: 361 North La Brea Avenue
Los Angeles, California

Figure 1: Site Topographic Map

File No.: Fig-1

Date:

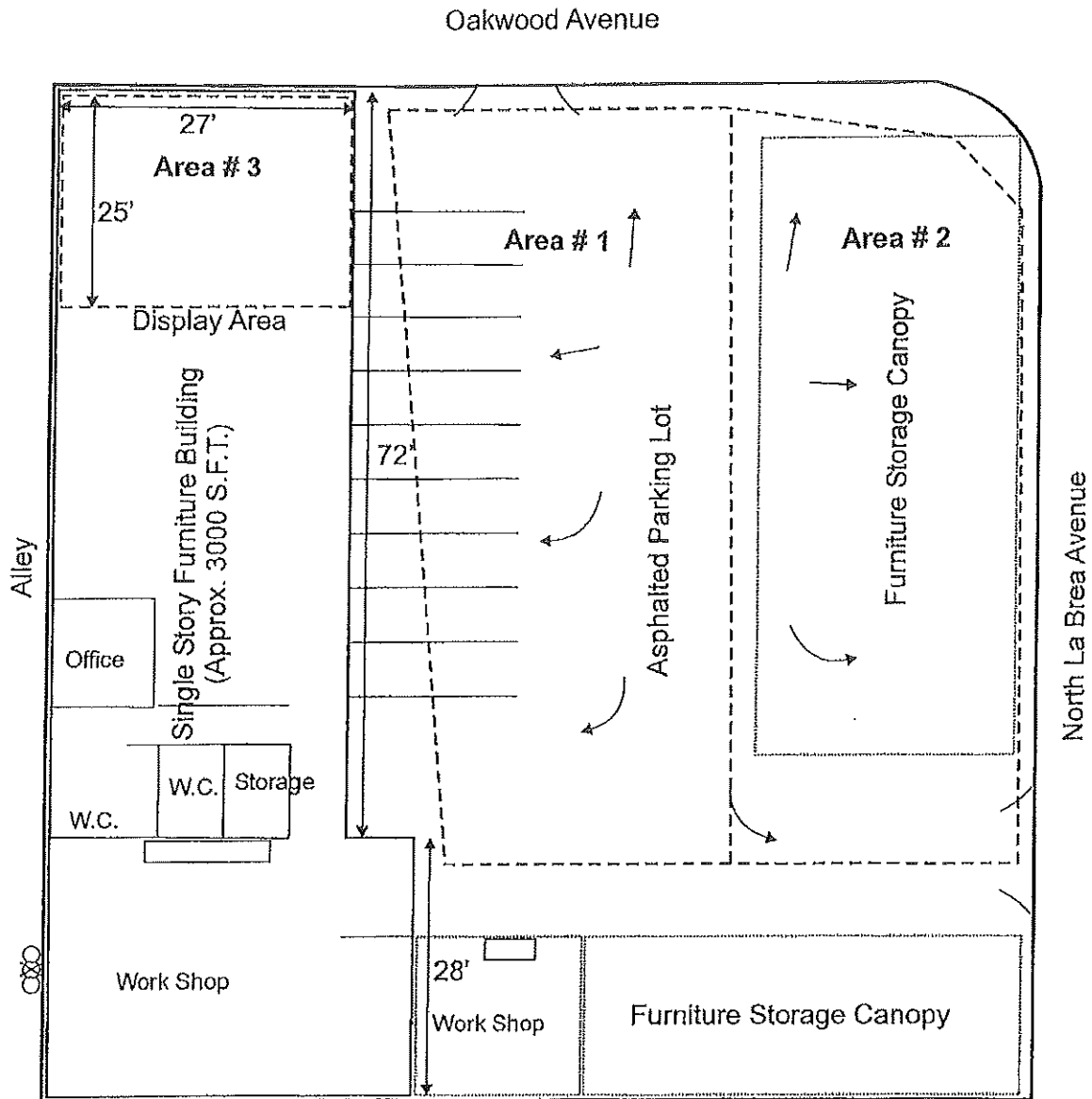
August 2001

Designed by:





M.B.

Drawn by:

M.B.



Legend

-  Solvents and glue storage
-  Pole mounted transformers
-  Surface Storm Water Runoff
-  Investigation Area



Not to Scale

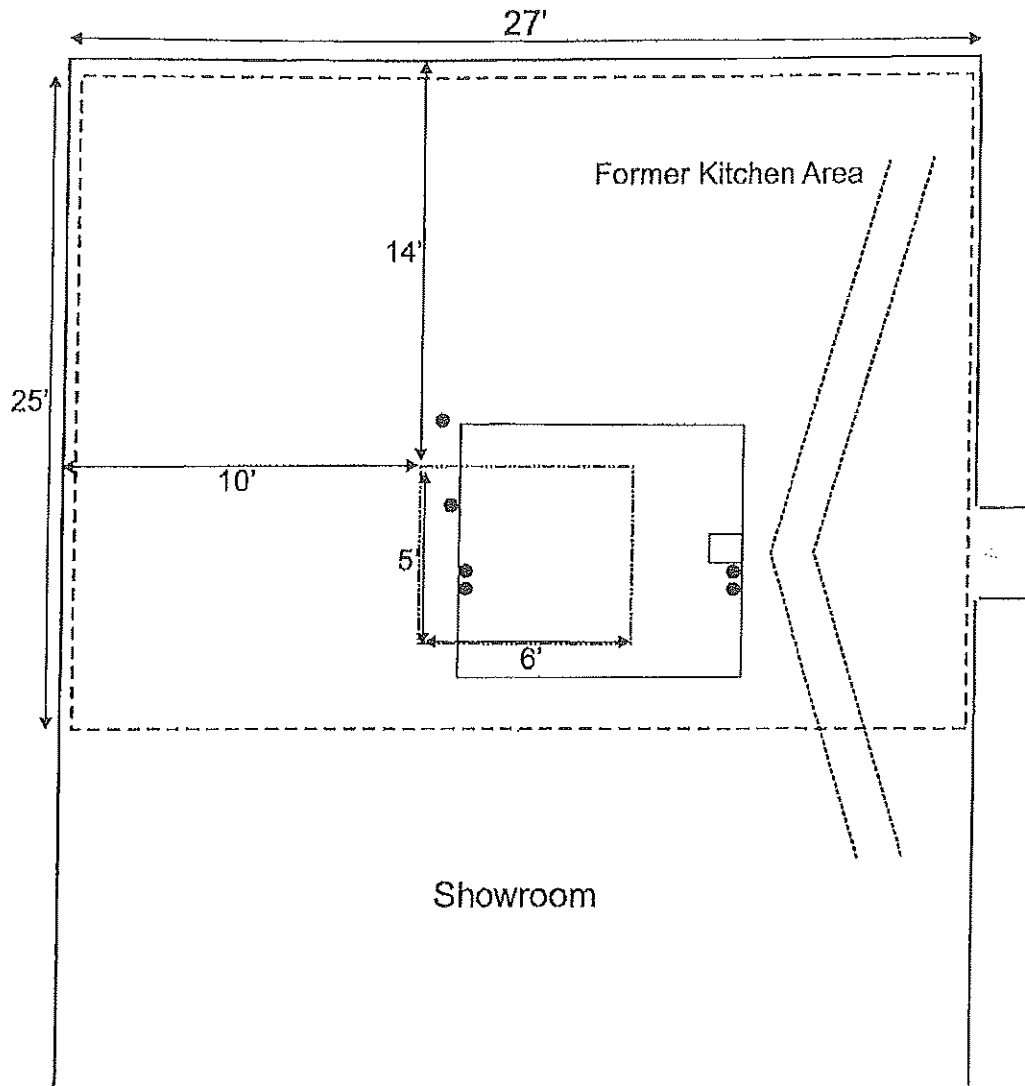
BEACON ENVIRONMENTAL

Loud & Cool Furniture

Project: 361 North La Brea Avenue
Los Angeles, California

Figure 2: Site Plot Plan

Area # 3



Legend

- Approximate Area of Black Mastic
- Pole mounted transformers
- Surface Storm Water Runoff
- Investigation Area
- Target Area: 5' by 6', 2' to 3' bgs
- Former Cutout
- Pipes (approx. 2" thin wall brass pipes)
- Square concrete cutout



Not to Scale

BEACON ENVIRONMENTAL

Loud & Cool Furniture

Project: 361 North La Brea Avenue
Los Angeles, California

Figure 3: Investigation Area # 3

Exhibit D

ENCON Phase II ESA Report,
dated July 2022 (text only)

ENCON

PHASE II ESA REPORT *SUBSURFACE SOIL AND SOIL GAS INVESTIGATION*

Subject Property:

Commercial Property
Hertz Car Rental Operation
361 North La Brea Avenue
Los Angeles, California 90036

Performed for:

Mr. Todd Lesko, Legal Office
Burnett & Lesko LLP
6 Venture, Suite 100
Irvine, California 92618

Prepared by:

ENCON Technologies, Inc.
Environmental & Engineering Services
12145 Mora Drive, Unit #7
Santa Fe Springs, California 90670
Tel: (562) 777 - 2200
Fax: (562) 777 - 2201
E-mail: encon@encontech.net

May 19, 2022

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FIGURES:

Figure 1	Site Vicinity Map
Figure 2	Site Map with Sampling Locations

EXHIBITS:

Exhibit A	Soil Analytical Laboratory Reports
Exhibit B	Soil Gas Analytical Laboratory Report
Exhibit C	Geophysical Survey Report
Exhibit D	Partner Phase I ESA Report, dated April 15, 2022 (text only)

1.0 INTRODUCTION

ENCON Technologies Inc. (ENCON) was retained by the Law Offices of Burnett & Lesko LLP, attention: Mr. Todd Lesko, (Client) to conduct a Phase II ESA Subsurface Investigation at the Hertz Car Rental commercial property located at 361 North La Brea Avenue, Los Angeles, California 90036. The Phase II ESA Subsurface Investigation was conducted to evaluate the potential impact of automotive petroleum hydrocarbons and volatile organic compounds to soil and soil gas from the former gas service station that operated at the Subject Site between 1928 and 1953 as well as recent car wash clarifier activities based on the findings and recommendations provided in the Partner Phase I ESA Report, dated April 15, 2022, provided in Exhibit D for reference.

2.0 SITE INFORMATION

The Subject Property is located on the southwest corner of North La Brea Avenue and Oakwood Avenue. The Subject Property is currently operated by Hertz Rent-A-Car for commercial use since 2016 to the present time. Onsite operations include of car storage and vehicle rental services and the current structures include; large asphalt parking lot, Hertz Rental retail offices, 2-tent car washing operation on the south portion of the property, and a food service small warehouse located on the southwest portion of the property. No auto service or repair or gas dispensing activities are conducted on the Subject Property at this time or since the 1950s when Chandler & King Auto Service occupied the Property.

The following Recognized Environmental Conditions (RECs) were identified in the Partner Phase I ESA Report, provided in Exhibit D for reference:

- **REC #1** – Based on the presence of the gasoline service station between 1928 and 1950s and the absence of UST tank site closure documents confirming the site conditions at the time closure is considered site condition of concern, requiring subsurface soil and soil gas investigation. Note: Beacon Environmental conducted a geophysical survey using Spectrum Geophysics, Inc in August 2001 and found no evidence of UST tanks or ancillary piping in the current parking lot area of the Subject Site. (Refer to Exhibit C for more details);
- **REC #2** – Since auto service was conducted on the property between 1928 and 1950 that most likely included auto repairs and motor oil services in the building structures along the west portion of the property, auto solvents, waste oils, and hydraulic oils most likely were handled and stored in the vicinity of the main building structure, spills and leaks are considered site conditions of concern, requiring a soil and soil gas subsurface investigations;

- **REC #3** – The Subject Property operates one (1) 3-stage wastewater clarifier long the south boundary of the property to treat wastewater generated from the car washing activities. Although the current chemical detergents are generally non-hazardous, the Phase I ESA reported that there were no documents showing the clarifier installation date so, the former uses may have involved automotive chemicals of concern. The investigation was limited to one (1) soil sample in the vicinity of the clarifier because of a high-pressure natural gas line located adjacent to the clarifier and a 10-foot clearance requirement required by the City DPW Inspector.

3.0 ENVIRONMENTAL SETTING

3.1 Geology

The 2022 United States Geological Survey (USGS) *Hollywood, California* Quadrangle 7.5-minute series topographic map was reviewed as part of the Phase I ESA performed by Partner. According to the contour lines on the topographic map, the Subject Site is located at approximately 235 feet above mean sea level (aMSL). The contour lines in the area of the Subject Site indicate the area is sloping toward the southwest.

The Subject Site is located in the Los Angeles Basin, which is within the northwest portion of the Peninsular Range geomorphic province. The basin is bounded to the north by the Santa Monica Mountains and Elysian Hills, to the east by the Puente and Merced Hills, and to the south by the Santa Ana Mountains. The Site is within the southwestern margin of a physiographic feature known as the La Brea Plain, an older alluvial deposit along the southern limit of the Santa Monica Mountains, west of the Elysian Hills and east of the Newport Inglewood fault zone. The La Brea Plain is an alluvial apron formed by the deposition of alluvial sediments on an erosional surface cut into underlying lower Pleistocene and older formations. Soil profiles up to 20 feet in thickness have been recognized on the older alluvial aprons of the coastal plain and typically consist of weathered, reddish brown soils with gravel to boulder-sized rock fragments derived from the nearby hillside areas. These older alluvial aprons are generally underlain by thick water-bearing sediments, some of which are susceptible to recharge and can affect groundwater storage of underlying aquifers.

Based on information obtained from Program Environmental Impact Report for Hollywood Community Plan Area (CPA) prepared by Los Angeles City Planning Department in March, 2011, much of the site vicinity is built on an alluvial fan created by sediments carried by water flowing out of area canyons. The geologic unit underling the CPA is alluvium. Alluvium consists of sediments eroded, transported and deposited by water flow. Courser sediments tend to be deposited in the mountains while finer sediment is deposited far from the mountains. These finer sediments may include large amounts of sand and sandy slit which are very porous and move very easily during seismic activity. This type of soil tends to amplify damage during seismic activity. (Partner, 2022).

3.2 Hydrogeology

While under natural and undisturbed conditions shallow groundwater flow most frequently follows the topography of the land surface, natural or man-made features can affect flow direction, and the presumed flow may not match the actual flow directions at the Subject Site and vicinity. Topographic map interpretation indicates the direction of groundwater flow in the vicinity of the subject property is inferred to be toward the southwest.

According to information on the State Water Resources Control Board GeoTracker database, the depth to groundwater in the vicinity of the subject property is inferred to be approximately 17 to 19 feet bgs and groundwater flow toward the northwest.

According to available information, a public water system operated by the Los Angeles Department of Water and Power (LADWP) serves the subject property vicinity. The sources of public water for the City of Los Angeles are surface waters from the State Water Project (including 22 dams and reservoirs), Colorado River, Owens River, Mono Lake Basin, and approximately 30-percent comes from groundwater source. (Partner, 2022).

4.0 SOIL AND SOIL GAS INVESTIGATION FIELD ACTIVITIES

4.1 Pre-Investigation Activities

The pre-investigation activities included: utility clearance, notification of tenant, mark the boring locations, developing a site-specific Health & Safety Plan, and reviewing the previous geophysical report:

- 1) ENCON notified Underground service Alert (USA) to clear public utilities 72 hours in advance of the mobilization. City DPW identified a high-pressure natural gas line on the south property line and required a 10-foot clearance area;
- 2) ENCON prepared and implemented a site-specific Health & Safety Plan that was presented to the technician staff prior to commencing field work;
- 3) ENCON was granted access to the Hertz Property for one-day field work on May 15, 2022 to prevent any business interruption from the investigation field work;
- 4) The former Spectrum Geophysical Report, dated August 2001, was thoroughly reviewed and no UST tanks were anticipated to be encountered during the investigation.

4.2 Scope of Investigation

ENCON sampling plan was expanded to include additional: soils, soil gas, and sub-slab soil vapor sampling in soils. It is ENCON's professional opinion that this approach would provide sufficient soil and soil vapor data to evaluate the Subject Site RECs and indicate the presence of any significant adverse environmental conditions of concern from the past gasoline station and auto service operations that may limit or restrict the use of the Subject Property for the current commercial use.

The ENCON Phase II ESA Subsurface Investigation scope included the advancement of seven (7) exploratory soil borings and eight (8) subsurface soil gas probes on May 15, 2022 as described in Table 1 and shown in Figure 2. The site conditions and targeted RCEs directed the investigation to the shallow zone and the number of soil gas sampling was increased in this revised sampling plan. The number of samples collected were also expanded since the 5410 Geoprobe direct-push drill rig encountered refusal at shallow depths due to the presence of the fine-grained and coarse-grained sand soil with no plasticity and dry soil lithology.

The soil and soil gas samples were collected using a 5410 Geoprobe direct-push drilling rig and proper environmental clean-sampling methods. The soil samples were collected using a direct-push sampler 1" diameter polyethylene sleeve. The soil gas samples were collected using a calibrated vacuum pump and Tedlar bags. The soil and soil gas samples were labeled and transported to a State certified laboratory for analysis using property chain-of-custody documentation and procedures. Selected soil and gas samples were analyzed for petroleum hydrocarbons using EPA Method 8015M and volatile organic compounds (VOCs) using EPA Method 8260B.

4.3 Soil Sampling Methods

All of the soil borings were advanced using a Geoprobe 5410 truck mounted direct push drill rig. The soil samples were collected with a 1" diameter by 30-inch removable acetate liner from each sampling interval. Each liner was cut at both ends and the center 6" portion of the liner was capped on both ends with Teflon and plastic caps.

All sampling equipment was properly cleaned between sample intervals and boring locations. The sampling equipment was cleaned using a triple rinse decontamination process consisting of a phosphate free primary wash (Alconox or TSP), a secondary stage with a low pH water to reduce the likelihood cross-contamination (mild solution of nitric acid HN03), and a tertiary rinse using de-ionized water. Soil samples were visually inspected in the field for traces of contamination. Groundwater was not encountered during drilling.

Upon collection, all soil and surficial material samples were labeled, recorded on a chain-of-custody document, and placed in cold storage until delivered to a state-certified laboratory for analysis. Samples were collected in accordance with accepted EPA Sampling Protocol and handled according to standard EPA chain-of-custody procedures. No evidence of subsurface contamination odors or discoloration in soils was indicated in the borings or soil cuttings. No groundwater or saturated zones were encountered during the drilling at any depth. Soil boring locations are illustrated in Figure 2.

4.4 Soil Gas Sampling Methods

The soil gas probes were installed using Geoprobe 5410 truck mounted direct-push rig. All of the soil gas probes consisted of an air diffuser connected to ¼" diameter polyethylene flex tubing that extended to above the grade surface for sampling. The space surrounding the diffusers was filled with fine sand and sealed to the near surface with bentonite chips and water treatment.

The soil gas sampling probes were allowed to equilibrate, and sampling was conducted by applying a vacuum and collecting vapor samples. After each probe was allowed to equalize, soil gas sample was extracted using a Xitech Model 1060H 1-Liter High Vac Bag Sampler vacuum pump and sampling box drawing air from the subsurface through the poly tubing and filling a Tedlar bag located inside the Sampler Box, upstream from the pump. The samples were collected after purging at least 7 pore volumes by the Field Technician.

4.5 Post Sampling Closure Activities

After collecting soil samples from each boring location, the boring was permanently closed by filling the boring in 3 feet intervals with bentonite chips and water to 1" below surface grade. The boring was capped to match the surrounding surfaces with concrete and finished. The soil gas probes and 1/4" plastic tubing were physically removed and the bore holes were backfilled with concrete patch.

5.0 SOIL AND SOIL GAS SUBSURFACE INVESTIGATION RESULTS AND EVALUATION CRITERIA

Low Risk Screening Evaluation Criteria: (DTSC VI Guidance Feb2020, CalEPA OHHEA Regional Water Quality Control Board Agency Memo, September 2018, and ASTM E1739-15, X1.7.11): The USEPA and CalEPA agencies have adopted a one-in-million (1.0×10^{-6}) cancer risk as being of negligible concern and in targeted commercial settings, theoretical cancer risks of up to 1.0×10^{-4} have been acceptable. Risk levels between 1.0×10^{-6} to 1.0×10^{-4} are within the acceptable further evaluation and management decision risk range (DTSC VI Screening and Evaluating Guidance Feb 2020). The risk level of 1.0×10^{-5} is the midpoint of the manageable risk range and generally acceptable "no significant risk" for a commercial setting. Maximum cancer risk levels above 1.0×10^{-4} generally require corrective actions.

6.0 SOIL SAMPLE LABORATORY RESULTS AND EVALUATION

Sixteen (16) soil samples were submitted to a State-Certified analytical laboratory, accredited under the Environmental ELAP for analysis. The soil results are summarized in Table 2 and Table 3 below and the complete laboratory analytical reports are provided in Exhibit A for reference. The collected soil samples were submitted for analyses using proper sampling and chain-of-custody procedures for the following constituents of concern, petroleum hydrocarbons in the gasoline carbon ranges and fuel additive ad oxygenates using EPA Method 8620B, in order to address the targeted VOCs identified at the Subject Site in the former gas station UST tank area.

Table 2: Soil Sample Analytical Results in the Former Gas Station Area –

Sample ID	TPHg (mg/kg)	Benzene (ug/kg)	Ethylbenzene (ug/kg)	Toluene (ug/kg)	Xylenes (ug/kg)	Naphthalene (ug/kg)	MtBE (ug/kg)	All Other VOCs (ug/kg)
SB6-5'	ND	ND	ND	ND	ND	ND	ND	ND
SB6-10'	ND	ND	ND	ND	ND	ND	ND	ND
D1-4'	ND	ND	ND	ND	ND	ND	ND	ND
D2-4'	ND	ND	ND	ND	ND	ND	ND	ND
RL	0.20	1.0	1.0	1.0	1.0	1.0	1.0	1.0
Direct soil exposure risk levels	100	1400	26,000	NA	NA	3800	210	varies
Leaching to groundwater levels	500	25	430	3200	2100	42	28	varies

None of the analyzed soil samples in the former gas station operations contained detectable concentrations of TPH or VOC auto solvents and fuel additives and the RSLs were below the applicable regulatory soil screening guidelines. All of the soil data was found to be below detection limits in the vicinity of the former gas station USTs and dispensers. This soil data suggests that the Subject Property was not adversely impacted by the former gas station operations between 1925 and 1950s targeted in the parking lot of the current site. No indications of gasoline sources were detected in soils sampled beneath the Subject Site and therefore, no targeted remediation is suggested and the threat to regional groundwater or direct exposure is low or de minimis from the past gas station and the current Hertz Car Rental operations at the Subject Site.

**Table 3: Soil Sample Analytical Results in the
Former Auto Service Garage and Clarifier Area --**

Sample ID	TPHo (mg/kg)	Benzene (ug/kg)	Ethylbenzene (ug/kg)	PCE (ug/kg)	TCE (ug/kg)	Naphthalene (ug/kg)	Toluene (ug/kg)	All Other VOCs (ug/kg)
SB1-5'	ND	ND	ND	ND	ND	ND	ND	ND
SB2-5'	ND	ND	ND	ND	ND	ND	ND	ND
SB3-5'	ND	ND	ND	ND	ND	ND	ND	ND
SB4-5'	ND	ND	ND	ND	ND	ND	ND	ND
RL	10.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0
Direct soil exposure risk levels	1000	1400	26,000	2700	5000	3800	NA	varies
Leaching to groundwater levels	10,000	25	430	50	50	42	3200	varies

None of the analyzed soil samples in the former garage auto service or current wastewater clarifier operations contained detectable concentrations of TPH or VOC auto solvents and fuel additives and the RSLs were below the applicable regulatory soil screening guidelines. All of the soil data was found to be below detection limits in the vicinity of the former auto service garage and current wastewater 3-stage clarifier unit. This soil data suggests that the Subject Property was not adversely impacted by the former auto service station operations between 1925 and 1950s or the historical use of the 3-stage wastewater treatment unit. No indications of waste oil or VOC auto solvent sources were detected in soils sampled beneath the Subject Site and therefore, no targeted remediation is suggested and the threat to regional groundwater or direct exposure is low or de minimis from the past auto service station and the current Hertz Car Rental car wash operations at the Subject Site.

7.0 SOIL GAS SAMPLE LABORATORY RESULTS AND VAPOR INTRUSION EVALUATION

Eight (8) subsurface soil gas samples were collected at 5 ft-bgs beneath the Subject Site as shown in Figure 2 in the vicinity of the former gas station gasoline and auto service operations (SV1 thru SV5 and SVD1 and SVD2) to address soil vapor impacts and future vapor intrusion conditions and one sub-slab soil gas sample was collected at 2 ft-bgs (SV6). All of the samples were submitted to a State-Certified analytical laboratory, accredited under the Environmental ELAP for analysis. The soil gas results are summarized in Table 2 below and the complete laboratory analytical reports are provided in Exhibit B for reference. All of the soil gas samples were submitted for analyses using proper sampling and chain-of-custody procedures for the following constituents of concern, volatile organic compounds associated with gasoline storage and use and auto service solvents using EPA Method 8620B, in order to address the targeted RECs identified at the Subject Site.

Table 4: Subsurface Soil Gas Sample Analytical Results – ug/L

Sample ID	Benzene (ug/L)	Ethylbenzene (ug/L)	PCE (ug/L)	Naphthalene (ug/L)	Toluene (ug/L)	All Other VOCs (ug/L)
SV1-5'	ND	0.045	ND	ND	0.152	ND
SV2-5'	ND	0.009	ND	ND	0.044	ND
SV3-5'	0.010	0.010	ND	ND	0.055	ND
SV4-5'	0.021	0.014	ND	ND	0.088	ND
SV5-5'	0.014	0.020	ND	ND	0.072	ND
SV5-12'	ND	0.027	ND	ND	0.075	ND
D1SV-5'	0.009	0.025	ND	ND	0.070	ND
D2SV-5'	0.035	0.058	ND	ND	0.264	ND
SV6-18"	0.023	0.257	ND	ND	0.230	ND
RL	1.0	1.0	1.0	1.0	1.0	1.0
No Significant VI Risk - Soil Gas Screening Levels (1.0×10^{-05}) for Commercial Setting, CalEPA DTSC SSLs Jun 2020 / AF of 0.03	0.140	1.60	0.67	0.120	NA	varies
Commercial VOC Soil Gas Screening Levels (DTSC-SSLs AF of 0.03, February 2020) for VI Risk Management Range from 1.0×10^{-06} and 1.0×10^{-04}	<1.4	<16.0	<6.7	<1.2	NA	varies

Note: ND – Not detected above laboratory reporting limits; RL – Laboratory reporting limit; PCE – Tetrachloroethane;
VOCs – Volatile Organic Compounds; Naphthalene – Gasoline and Auto Repair solvent
BTEX – Benzene, Ethylbenzene, Toluene, and Xylenes Gasoline constituents
NA – Non published

ENCON

The eight (8) soil gas samples were collected and analyzed to assess the presence of soil gas from any residual gasoline or auto solvent releases and potential vapor intrusion from the residual soil gas chemical present the Subject Property. Trace levels of gasoline additives BTEX, and no garage auto VOC solvents, were detected in soils. The laboratory analyses identified the presence of slightly elevated concentrations of benzene and ethylbenzene solvent concentrations ranging up to a maximum of 0.035 ug/L and 0.257 ug/L, respectively. These benzene and ethylbenzene concentrations are above the laboratory reporting limits at trace levels of gasoline additives and below the projected soil screening levels for no significant VI risk at the most conservative attention factor of 0.03 at 0.140 ug/L and 1.60 ug/L, respectively. Refer to the Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air (CalEPA DTSC June 2020 HERO Note #3 and Feb 2020 VI Guidance).

The estimated cumulative cancer risk was calculated using the maximum benzene and ethylbenzene concentration of 0.035 ug/L and 0.058 ug/L, respectively, and the potential vapor intrusion threat was found to be a low threat at a no significant health cancer risk of 0.410×10^{-5} and a non-cancer hazard quotient of 0.082 which are below the acceptable benchmarks of 1.0×10^{-5} and 1.0, respectively, for commercial use. Refer to Section 5.0 for more details.

8.0 CONCLUSIONS AND RECOMMENDATIONS

Based on the ENCON Phase II ESA Investigation soil and soil gas data presented in this report, there does not appear to be a significant release(s) from the former gas station and auto service operations conducted on the Subject Site. Also, based on the former geophysical survey conducted by Spectrum Geophysics in 2001, Spectrum reported that they did not find any evidence of UST tanks or ancillary piping in the current parking lot of the Subject Site.

ENCON completed the soil and soil gas investigation at the commercial Subject Site and the data suggests that the Subject Property has not been impacted above State of California soil and soil gas screening levels that warrant any further investigation or active remediation at this time for commercial use. The following conclusions can be made based on the data and the CalEPA DTSC 2020 VI Guidance, HRRR HERO Note #3 RSLs Guidance, and the ASTM E1739-15, X1.7.11 reference documents.

No indications of hazardous chemical sources were detected in soils or soil gas vapors beneath the Subject Site or main building footprint and therefore, no targeted active remediation is suggested and the threat to regional groundwater is indicated to be low from the past gas station and auto service activities as well as the current Hertz Car Rental commercial operations at the Subject Site.

The potential vapor intrusion impacts were evaluated utilizing the methods described in the Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air (CalEPA DTSC HERO Note #3 and 2020 VI Screening and Evaluation Guidance) and the estimated cancer risk was compared, using the maximum benzene and ethylbenzene gasoline additive concentrations of 0.035 ug/L and 0.257, respectively, to the DTSC published ESLs screening levels for a commercial use at 0.14 ug/L and 1.6 ug/L and the vapor intrusion threat was found to be a low threat at a no significant health risk of 0.41×10^{-05} that is acceptable and safe for commercial use as well as the current Hertz Car Rental operation.

In addition, the vapor intrusion risk was found to be within the CalEPA DTSC published risk management decision range of 1.0×10^{-06} and 1.0×10^{-04} for future commercial use. If in the future, the Subject Site is redeveloped or the use is changed to a more sensitive use: such as, residential or health care, further subsurface investigation may be warranted and the implementation of engineering and administrative VI controls should be evaluated and installed as needed by a licensed environmental contractor.

9.0 REPORT CONDITIONS AND LIMITATIONS

ENCON Technologies, Inc., Environmental & Engineering Services (ENCON) was retained by the legal firm, Burnett & Lesko LLP, Project Client and Potential Buyer Representative, to perform a Phase II Environmental Site Assessment Soil and Soil Gas Investigation for the Hertz Car Rental commercial property located at 361 North La Brea Avenue in Los Angeles, California (Subject Site). The Phase II ESA conclusions and recommendations presented in this report were based upon the soil and soil gas investigation performed by ENCON Technologies, Inc. in accordance with the ASTM E1739-15 site environmental risk assessment as well as the regulatory guidelines: The DTSC HERO issued regulatory update, Human Health Risk Assessment (HRA) Note No. 3 in June 2020 and the CalEPA DTSC Vapor Intrusion Screening and Evaluating Supplemental Guidance Document, dated February 2020, Step 4.

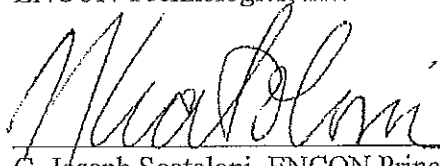
The consultant makes no guarantees as to the accuracy or completeness of information obtained from others. It is possible that information exists beyond the scope of this investigation. Additional information which was not made available to the Consultant at the time of conducting the ESA investigation and authoring the Report may result in a modification of the conclusions and recommendations presented.

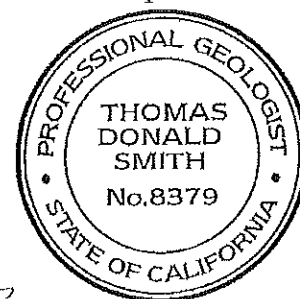
The Services performed by the Consultant have been conducted in a manner consistent with the level of care ordinarily exercised by members of our profession currently practicing under similar conditions. This report is not a legal opinion but may under certain circumstances be prepared at the direction of counsel, may be in anticipation of litigation, and may be classified as an attorney client communication or as an attorney-work product.

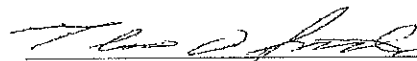
The findings in this report are based on field observations and analytical data provided by an independent laboratory. Interpretations of the subsurface conditions at the site were made from these observations and data. Subsurface conditions may vary from these data points.

If there are any questions regarding soil sample collection or soil analysis, please contact Joseph Scatoloni, Project Manager at (562) 777-2200.

Respectfully submitted by,
ENCON Technologies, Inc.


G. Joseph Scatoloni, ENCON Principal
Senior Environmental Project Manager

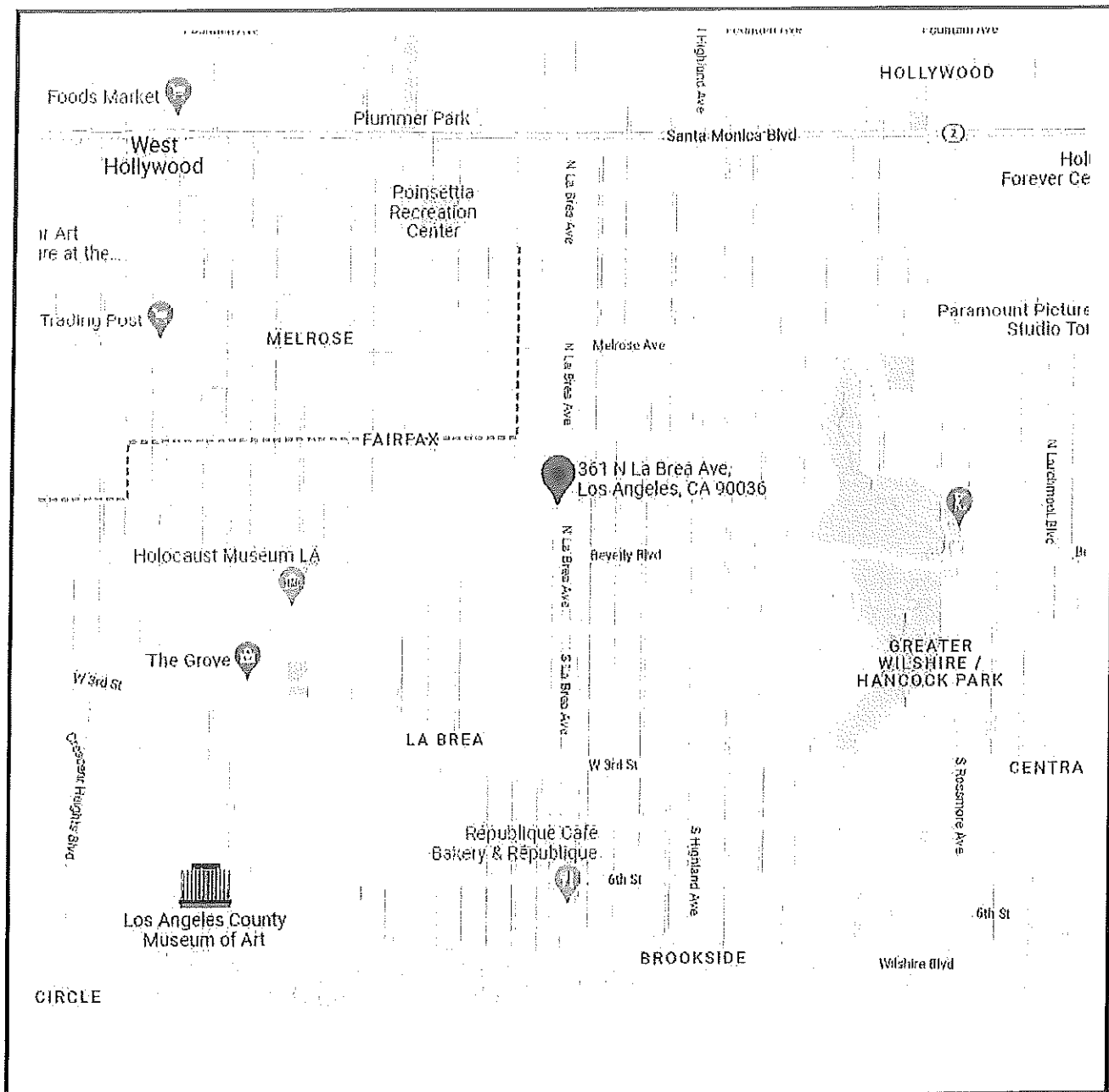




Thomas D. Smith
California Professional Geologist #8379

Expires June 30, 2022

FIGURES:

- | | |
|----------|----------------------------------|
| Figure 1 | Site Vicinity Map |
| Figure 2 | Site Map with Sampling Locations |



<p>ENCON Technologies, Inc.</p>  <p>12145 Mora Drive, Suite 7 Santa Fe Springs, CA 90670</p>	<p><i>Site Location Map</i></p> <p>361 North La Brea Avenue Los Angeles, California</p>	<p>LEGEND</p> <p>↑ North Scale: NA</p> <p>May 19, 2022</p> <p>FIGURE 1</p>
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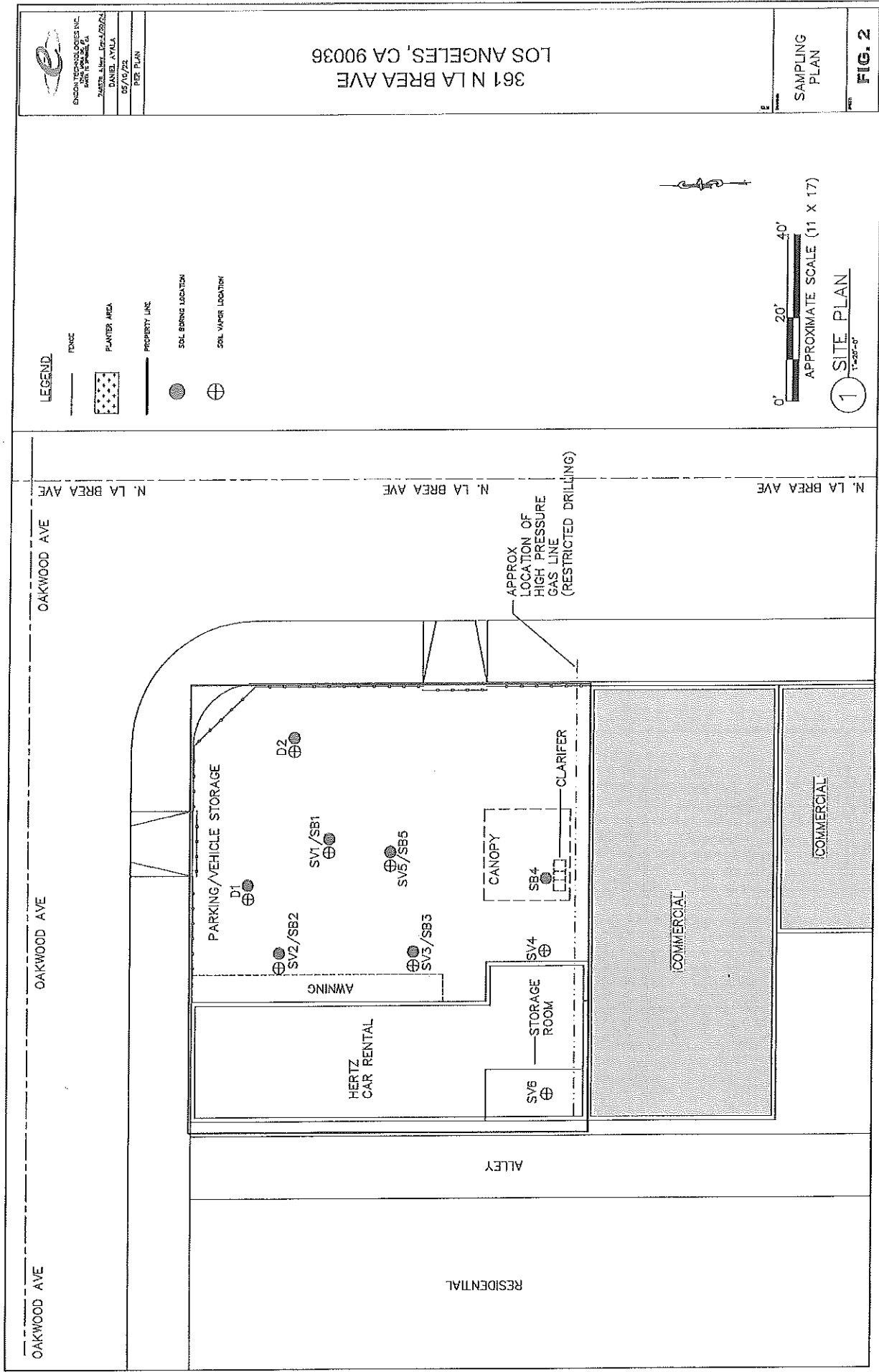
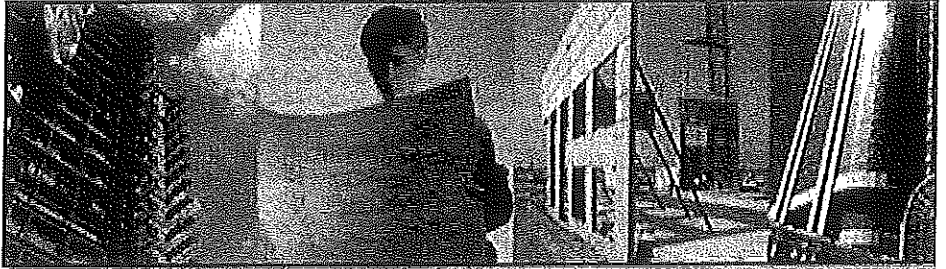


Exhibit E

Partner Phase I ESA Report,
dated April 15, 2022 (text only)

PARTNER

Engineering and Science, Inc.

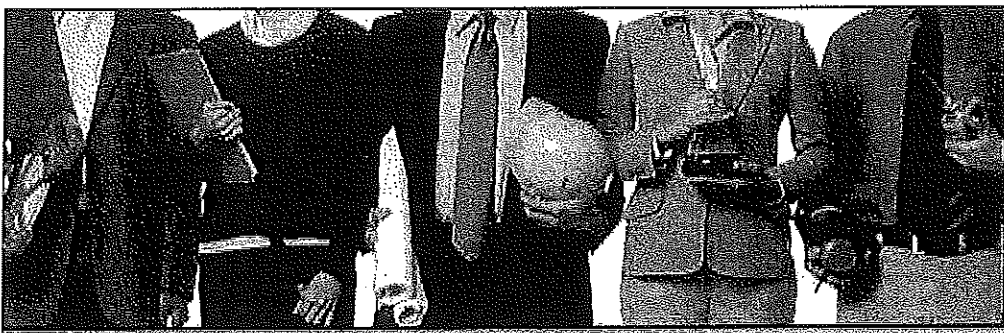


PHASE I ENVIRONMENTAL SITE ASSESSMENT REPORT

Hertz Car Rental

361 North La Brea Avenue
Los Angeles, California 90036

Report Date: April 15, 2022
Partner Project No. 22-362989.1



Prepared for:

Law Offices of Bernard P. Wiesel

4601 Wilshire Boulevard, Suite 205
Los Angeles, California 90010

PARTNER

Engineering and Science, Inc.

April 15, 2022

Mr. Bernard Wiesel
Law Offices of Bernard P. Wiesel
4601 Wilshire Boulevard Suite 205
Los Angeles, California 90010

Subject: Phase I Environmental Site Assessment
Hertz Rent-A-Car
361 North La Brea Avenue
Los Angeles, California 90036
Partner Project No. 22-362989.1

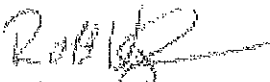
Dear Mr. Wiesel:

Partner Engineering and Science, Inc. (Partner) is pleased to provide this *Phase I Environmental Site Assessment* (Phase I ESA) report of the abovementioned address (the "subject property"). This assessment was performed in conformance with the scope and limitations as detailed in the ASTM Practice E1527-13 and E1527-21 Standard Practice for Environmental Site Assessments; Phase I Environmental Site Assessment Process and Client Agreement.

This assessment included a site reconnaissance as well as research and interviews with representatives of the public, property ownership, site manager, and regulatory agencies. An assessment was made, conclusions stated, and recommendations outlined.

We appreciate the opportunity to provide environmental services to you. If you have any questions concerning this report, or if we can assist you in any other matter, please contact me at (949) 481-9818.

Sincerely,



Robert Vaughn
National Client Manager

EXECUTIVE SUMMARY

Partner Engineering and Science, Inc. (Partner) has performed a Phase I Environmental Site Assessment (ESA) in accordance with the scope of work and limitations of ASTM Standard Practice E1527-13 and E1527-21, the Environmental Protection Agency Standards and Practices for All Appropriate Inquiries (AAI) (40 CFR Part 312) and set forth by Law Offices of Bernard P. Wiesel for the property located at 361 North La Brea Avenue in Los Angeles, Los Angeles County, California (the "subject property").

Property Description

The subject property is located on the western side of North La Brea Avenue and southern side of Oakwood Avenue within a commercial and residential area of Los Angeles, California. Please refer to the table below for further description of the subject property:

Subject Property Data	
Address:	361 North La Brea Avenue, Los Angeles, California 90036
Historical Addresses:	359 and 367 North La Brea Avenue
Property Use:	Commercial
Land Acreage (Ac):	0.24 acres
Number of Buildings:	One
Number of Floors:	One
Gross Building Area (SF):	2,975 SF
Date of Construction:	1955
Assessor's Parcel Number (APN):	5525-033-001
Type of Construction:	Brick, Wood-Framed and Plaster
Current Tenants:	Hertz Rent-A-Car
Site Assessment Performed By:	Nasim Ahmed of Partner
Site Assessment Conducted On:	April 1, 2022
Regulatory Radius Report Date:	March 24, 2022
Lien Search Date:	Not Provided
Report Date:	April 14, 2022
FOIAs Date:	April 1, 2022

The subject property is currently occupied by Hertz Rent-A-Car for commercial use. Onsite operations consist of car rental activities. In addition to the current structure, the subject property is improved with asphalt-paved parking areas and associated landscaping.

According to available historical sources, the subject property was formerly undeveloped as early as 1894; developed with a gasoline station and auto repair shops between 1928 and 1953; and developed with the current structure in 1955. Tenants on the subject property have included Oak Beauty Salon (1941-1945); Signal Oil Company (1941-1950); Breawood Music Company (1945); Chandler Automotive Service (1945); Serrano Beauty Salon (1950); Spitz Realty (1950); Chandler & King's Auto Service (1950); Holmes Tuttle Ford (1960-1981); Holmes Tuttle Leasing (1986-1991); Cheder of LA Inc. (1997); and Herts Rent-A-Car (2016-Present).

The adjoining properties are tabulated below:

Adjoining Properties	
North:	Oakwood Avenue followed by KARE Los Angeles (401 North La Brea Avenue) and multi-family residences (404 North Detroit Street)
Northeast:	Oakwood Avenue and North La Brea Avenue followed by One West Bank (400 North La Brea Avenue)
East:	North La Brea Avenue followed by Congregation Levi Yitzchak (356 North La Brea Avenue) and Mikvah (360 North La Brea Avenue)
South:	Sonia Boyajian Jewelry (357 North La Brea Avenue)
West:	Multi-family residences (360-364 North Detroit Street)

According to information on the State Water Resources Control Board GeoTracker database, the depth to groundwater in the vicinity of the subject property is inferred to be approximately 17 to 19 feet below ground surface (bgs) and groundwater flow is toward the northwest.

Findings and Opinions

Recognized Environmental Condition

A *recognized environmental condition (REC)* refers to the presence of hazardous substances or petroleum products in, on, or at the subject property due to a release to the environment; the likely presence of hazardous substances or petroleum products in, on, or at the subject property due to a release or likely release to the environment; or the presence of hazardous substances or petroleum products in, on, or at the subject property under conditions that pose a material threat of a future release to the environment. The following was identified during the course of this assessment:

- Review of historical sources identified the subject property to have previously been developed with a gasoline service station from time from 1928 to at least 1953. Partner's experience with historical gasoline service stations indicates that full services which include fueling and automotive service/repair were commonly conducted with little to no regulatory oversight. These operations commonly utilized petroleum products, solvents, and other hazardous substances. Furthermore, other equipment such as hydraulic hoists, sumps, and oil/water clarifiers were commonly utilized in connection with such operations. No documentation pertaining to the removal or closure of the former UST systems was identified on file with the State or local regulatory agencies consulted during the course of this assessment. Regulations governing UST systems were not implemented until 1985 and regulatory documentation regarding the presence/removal of USTs prior 1988 is not typically available. Additionally, no documentation was available indicating whether soil samples have been collected and analyzed for the presence of constituents of concern, as this was not a common practice at the time the gasoline service station was decommissioned. Based on the presence of the gasoline service station on the subject property for 25 years, the absence of documentation related to UST closure and removal, and the absence of previous subsurface investigations that could confirm the presence or absence of a release from the former operations, the former gasoline service station on the subject property is considered a REC.
- The subject property is equipped with one three-stage clarifier located along the southern boundary of the property. Clarifiers are used to treat waste water streams. Clarifiers are conduits

to the subsurface and when utilized to treat waste water streams, can act as preferential pathways for contaminants in the waste streams. A visual assessment of the interior of the clarifier was not reasonable ascertainable and the date of installation was not identified. Clarifiers can become compromised over time and as such is considered an REC.

Controlled Recognized Environmental Condition

A *controlled recognized environmental condition (CREC)* refers to a REC affecting the subject property that has been addressed to the satisfaction of the applicable regulatory authority or authorities with hazardous substances or petroleum products allowed to remain in place subject to implementation of required controls (for example, activity and use limitations or other property use limitations). The following was identified during the course of this assessment:

- Partner did not identify evidence of CRECs during the course of this assessment.

Historical Recognized Environmental Condition

A *historical recognized environmental condition (HREC)* refers to a previous release of hazardous substances or petroleum products affecting the subject property that has been addressed to the satisfaction of the applicable regulatory authority or authorities and meeting unrestricted use criteria established by the applicable regulatory authority or authorities without subjecting the subject property to any controls (for example, activity and use limitations or other property use limitations). The following was identified during the course of this assessment:

- Partner did not identify evidence of HRECs during the course of this assessment.

Business Environmental Risk

A *Business Environmental Risks (BER)* is a risk which can have a material environmental or environmentally driven impact on the business associated with the current or planned use of commercial real estate, not necessarily related to those environmental issues required to be investigated in this practice. The following was identified during the course of this assessment:

- According to the City of Los Angeles Department of Building and Safety and Department Planning, the subject property is located near significant oil production areas known as "Methane Zones." These areas, known as methane buffer zones, surround the methane zones. Methane buffer zone sites include sites immediately surrounding gas sources and where testing and sometimes mitigation are required by the City of Los Angeles Department of Building and Safety. Due to the potential environmental risk associated with construction in methane buffer zones, the property owner is required to conduct a methane assessment prior to the redevelopment of the subject property (Division 71 of the Los Angeles Building Code).
- Due to the age of the subject property building, there is a potential that asbestos-containing materials (ACMs) are present. Readily visible suspect ACMs were observed in good condition. However, should these materials be replaced, the identified suspect ACMs would need to be sampled to confirm the presence or absence of asbestos prior to any renovation or demolition activities to prevent potential exposure to workers and/or building occupants.

Significant Data Gaps

No significant data gaps affecting the ability of the Environmental Professional to identify a REC were encountered during this assessment.

Conclusions and Recommendations

Partner has performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E1527-13 and E1527-21 of 361 North La Brea Avenue in Los Angeles, Los Angeles County, California (the "subject property"). Any exceptions to, or deletions from, this practice are described in Section 1.5 of this report.

This assessment has revealed evidence of RECs and BERs in connection with the subject property. Based on the conclusions of this assessment, Partner recommends the following:

- A limited subsurface investigation should be conducted in order to determine the presence or absence of soil, soil vapor, and/or groundwater contamination due to the historical use of the subject property.
- Prior to any renovations or demolition activities at the subject property, a comprehensive asbestos survey is recommended. If such materials are identified and need to be disturbed, repaired or removed, a licensed abatement contractor should be consulted.

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- Appendix A** Site Photographs
Appendix B Historical/Regulatory Documentation
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1.0 INTRODUCTION

Partner Engineering and Science, Inc. (Partner) has performed a Phase I Environmental Site Assessment (ESA) in conformance with the scope and limitations of ASTM Standard Practice E1527-13 and E1527-21 and the Environmental Protection Agency Standards and Practices for All Appropriate Inquiries (AAI) (40 CFR Part 312) for the property located at 361 North La Brea Avenue in Los Angeles, Los Angeles County, California (the "subject property"). Any exceptions to, or deletions from, this scope of work are described in the report.

1.1 Purpose

The purpose of this ESA is to identify existing or potential Recognized Environmental Conditions (as defined by ASTM Standard E1527-13 and E1527-21) affecting the subject property that: 1) constitute or result in a material violation or a potential material violation of any applicable environmental law; 2) impose any material constraints on the operation of the subject property or require a material change in the use thereof; 3) require clean-up, remedial action or other response with respect to Hazardous Substances or Petroleum Products on or affecting the subject property under any applicable environmental law; 4) may affect the value of the subject property; and 5) may require specific actions to be performed with regard to such conditions and circumstances. The information contained in the ESA Report will be used by Client to: 1) evaluate its legal and financial liabilities for transactions related to foreclosure, purchase, sale, loan origination, loan workout or seller financing; 2) evaluate the subject property's overall development potential, the associated market value and the impact of applicable laws that restrict financial and other types of assistance for the future development of the subject property; and/or 3) determine whether specific actions are required to be performed prior to the foreclosure, purchase, sale, loan origination, loan workout or seller financing of the subject property.

This ESA was performed to permit the *User* to satisfy one of the requirements to qualify for the innocent landowner, contiguous property owner, or bona fide prospective purchaser limitations on scope of Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) (42 U.S.C. §9601) liability (hereinafter, the "*landowner liability protections*," or "*LLPs*"). ASTM Standard E1527-13 constitutes "*all appropriate inquiry* into the previous ownership and uses of the *property* consistent with good commercial or customary practice" as defined at 42 U.S.C. §9601(35)(B).

1.2 Scope of Work

The scope of work for this ESA is in accordance with and to the extent necessary to achieve the goal of the requirements set forth in the ASTM Standard E1527-13 and E1527-21. This assessment included: 1) a property and adjoining site reconnaissance; 2) interviews with key personnel; 3) a review of historical sources; 4) a review of regulatory agency records; and 5) a review of a regulatory database report provided by a third-party vendor. Partner contacted local agencies, such as environmental health departments, fire departments and building departments to obtain readily ascertainable information to determine any current and/or former hazardous substances usage, storage and/or releases of hazardous substances on the subject property. Additionally, Partner researched readily available information on the presence of activity and use limitations (AULs) at these agencies. As defined by ASTM E1527-21, AULs include both legal (that is, institutional) and physical (that is, engineering) controls that may include legal

or physical restrictions or limitations on the use of, or access to, a site or facility: 1) to reduce or eliminate potential exposure to hazardous substances or petroleum products in the soil, soil vapor, groundwater, or surface water on the subject property; or 2) to prevent activities that could interfere with the effectiveness of a response action, in order to ensure maintenance of a condition of no significant risk to public health or the environment. These legal or physical restrictions, which may include institutional and/or engineering controls (IC/ECs), are intended to prevent adverse impacts to individuals or populations that may be exposed to hazardous substances and petroleum products in the soil, soil vapor, groundwater, and/or surface water on a property.

If requested by Client, this report may also include the identification, discussion of, and/or limited sampling of asbestos-containing materials (ACMs), lead-based paint (LBP), mold, and/or radon.

1.3 Limitations

Partner warrants that the findings and conclusions contained herein were accomplished in accordance with the methodologies set forth in the Scope of Work. These methodologies are described as representing good commercial and customary practice for conducting an ESA of a property for the purpose of identifying recognized environmental conditions. There is a possibility that even with the proper application of these methodologies there may exist on the subject property conditions that could not be identified within the scope of the assessment or which were not reasonably identifiable from the available information. Partner believes that the information obtained from the record review and the interviews concerning the subject property is reliable. However, Partner cannot and does not warrant or guarantee that the information provided by these other sources is accurate or complete. The conclusions and findings set forth in this report are strictly limited in time and scope to the date of the evaluations. The conclusions presented in the report are based solely on the services described therein, and not on scientific tasks or procedures beyond the scope of agreed-upon services or the time and budgeting restraints imposed by the Client. No other warranties are implied or expressed.

Some of the information provided in this report is based upon personal interviews, and research of available documents, records, and maps held by the appropriate government and private agencies. This report is subject to the limitations of historical documentation, availability, and accuracy of pertinent records, and the personal recollections of those persons contacted.

This practice does not address requirements of any state or local laws or of any federal laws other than the all-appropriate inquiry provisions of the LLPs. Further, this report does not intend to address all of the compliance and safety concerns, if any, associated with the subject property.

Environmental concerns, which are beyond the scope of a Phase I ESA as defined by ASTM include the following: ACMs, LBP, radon, and lead in drinking water. These issues may affect environmental risk at the subject property and may warrant discussion and/or assessment; however, are considered non-scope issues. If specifically requested by the Client, these non-scope issues are discussed in Section 6.3.

1.4 User Reliance

Law Offices of Bernard P. Wiesel engaged Partner to perform this assessment in accordance with an agreement governing the nature, scope and purpose of the work as well as other matters critical to the engagement. All reports, both verbal and written, are for the sole use and benefit of Law Offices of

Bernard P. Wiesel. Either verbally or in writing, third parties may come into possession of this report or all or part of the information generated as a result of this work. In the absence of a written agreement with Partner granting such rights, no third parties shall have rights of recourse or recovery whatsoever under any course of action against Partner, its officers, employees, vendors, successors or assigns. Any such unauthorized user shall be responsible to protect, indemnify and hold Partner, Client and their respective officers, employees, vendors, successors and assigns harmless from any and all claims, damages, losses, liabilities, expenses (including reasonable attorneys' fees) and costs attributable to such Use. Unauthorized use of this report shall constitute acceptance of and commitment to these responsibilities, which shall be irrevocable and shall apply regardless of the cause of action or legal theory pled or asserted. Additional legal penalties may apply.

1.5 Limiting Conditions

The findings and conclusions contain all of the limitations inherent in these methodologies that are referred to in ASTM E1527-13 and E1527-21. Specific limitations and exceptions to this ESA are set forth below:

- Interviews with past or current owners, operators and occupants were not reasonably ascertainable and thus constitute a data gap. Based on information obtained from other historical sources (as discussed in Section 3.0), this data gap is not expected to alter the findings of this assessment.
- Partner requested information relative to deed restrictions and environmental liens, a title search, and completion of the AAI User Questionnaire from the Report User. This information was not provided at the time of the assessment.
- Partner was unable to adequately document the historical use of the subject property at five-year intervals or less for all time periods. This data failure is not considered critical and does not change the conclusions of this report, since no significant changes in property use were identified during undocumented periods greater than five years.
- Partner's view of the ground during the site assessment was obstructed due to parked cars. Based on information obtained from other historical sources, this limitation is not expected to alter the overall findings of this assessment.

2.0 SITE DESCRIPTION

2.1 Site Location and Legal Description

The subject property at 361 North La Brea Avenue in Los Angeles, California is located on the western side of North La Brea Avenue and southern side of Oakwood Avenue. According to information obtained from the Los Angeles County Assessor, the subject property is legally described as *TRACT # 4924 LOTS 1 AND LOT 2*.

Please refer to Figure 1: Site Location Map, Figure 2: Site Plan, Figure 3: Topographic Map, and Appendix A: Site Photographs for the location and site characteristics of the subject property.

2.2 Current Property Use

The subject property is currently occupied by Hertz Rent-A-Car for commercial use. Onsite operations consist of car rental activities. The subject property consists of one one-story building located on the west side of the property. In addition to the current building, the subject property is improved with asphalt-paved parking areas and associated landscaping.

The subject property is designated for commercial development by the City of Los Angeles.

The subject property was identified as a Facility and Manifest Data (HAZNET), Resource Conservation and Recovery Act (RCRA) Non-Generator (NonGen) and Facility Index System (FINDS) site in the regulatory database report, as further discussed in Section 4.2.

2.3 Current Use of Adjoining Properties

The subject property is located within a commercial and residential area of Los Angeles, California. During the vicinity reconnaissance, Partner observed the land uses on adjoining properties as defined in ASTM E1527-13 and E1527-21 as any real property or properties the border of which is contiguous or partially contiguous with that of the property, or that would be contiguous or partially contiguous with that of the property but for a street, road, or other public thoroughfare separating them. The adjoining properties are tabulated below:

Adjoining Properties

North:	Oakwood Avenue followed by KARE Los Angeles (401 North La Brea Avenue) and single-family residence (404 North Detroit Street)
Northeast:	Oakwood Avenue and North La Brea Avenue followed by One West Bank (400 North La Brea Avenue)
East:	North La Brea Avenue followed by Congregation Levi Yitzchak (356 North La Brea Avenue) and Mikvah (360 North La Brea Avenue)
South:	Sonia Boyajian Jewelry (357 North La Brea Avenue)
West:	Multi-family residences (360-364 North Detroit Street)

The adjoining property to the northeast was identified as a City of Los Angeles Underground Storage Tank List (UST LA City) site in the regulatory database report of Section 4.2.

2.4 Physical Setting Sources

2.4.1 Topography

The 2022 United States Geological Survey (USGS) *Hollywood, California* Quadrangle 7.5-minute series topographic map was reviewed for this ESA. According to the contour lines on the topographic map, the subject property is located at approximately 235 feet above mean sea level (MSL). The contour lines in the area of the subject property indicate the area is sloping toward the southwest.

A copy of the topographic map is included as Figure 3.

2.4.2 Hydrology

While under natural and undisturbed conditions shallow groundwater flow most frequently follows the topography of the land surface, natural or man-made features can affect flow direction, and the presumed flow may not match the actual flow directions at the subject property and vicinity. Topographic map interpretation indicates the direction of groundwater flow in the vicinity of the subject property is inferred to be toward the southwest.

According to information on the State Water Resources Control Board GeoTracker database, the depth to groundwater in the vicinity of the subject property is inferred to be approximately 17 to 19 feet bgs and groundwater flow toward the northwest.

The nearest surface water to the subject property is the Silver Lake Reservoir located approximately 5.0 miles to the northeast of the subject property. No settling ponds, lagoons, surface impoundments, wetlands or natural catch basins were observed at the subject property during this assessment.

According to available information, a public water system operated by the Los Angeles Department of Water and Power (LADWP) serves the subject property vicinity. The sources of public water for the City of Los Angeles are surface waters from the State Water Project (including 22 dams and reservoirs), Colorado River, Owens River, Mono Lake Basin, and approximately 30-percent comes from groundwater source.

2.4.3 Geology/Soils

The subject property is located in the Los Angeles Basin, which is within the northwest portion of the Peninsular Range geomorphic province. The basin is bounded to the north by the Santa Monica Mountains and Elysian Hills, to the east by the Puente and Merced Hills, and to the south by the Santa Ana Mountains. The Site is within the southwestern margin of a physiographic feature known as the La Brea Plain, an older alluvial deposit along the southern limit of the Santa Monica Mountains, west of the Elysian Hills and east of the Newport-Inglewood fault zone. The La Brea Plain is an alluvial apron formed by the deposition of alluvial sediments on an erosional surface cut into underlying lower Pleistocene and older formations. Soil profiles up to 20 feet in thickness have been recognized on the older alluvial aprons of the coastal plain and typically consist of weathered, reddish brown soils with gravel to boulder-sized rock fragments derived from the nearby hillside areas. These older alluvial aprons are generally underlain by thick water-bearing sediments, some of which are susceptible to recharge and can affect groundwater storage of underlying aquifers.

Based on information obtained from Program Environmental Impact Report for Hollywood Community Plan Area (CPA) prepared by Los Angeles City Planning Department in March, 2011, much of the site

vicinity is built on an alluvial fan created by sediments carried by water flowing out of area canyons. The geologic unit underling the CPA is alluvium. Alluvium consists of sediments eroded, transported and deposited by water flow. Coarser sediments tend to be deposited in the mountains while finer sediment is deposited far from the mountains. These finer sediments may include large amounts of sand and sandy silt which are very porous and move very easily during seismic activity. This type of soil tends to amplify damage during seismic activity.

2.4.4 Flood Zone Information

Partner performed a review of the Flood Insurance Rate Map, published by the Federal Emergency Management Agency. According to Community Panel Number 06037C1605F, dated September 26, 2008, the subject property appears to be located in Zone X, an area of minimal flood hazard located outside of the 100-year and 500-year flood plains.

3.0 HISTORICAL INFORMATION

Partner obtained historical use information about the subject property from a variety of sources. A chronological listing of the historical data found is summarized in the table below:

Historical Use Information		
Years	Resource	Description/Use
1894-1926	Topographic Maps, Fire Insurance Map	Unimproved land
1928-1953	Aerial Photographs, Building Records, City Directories, Fire Insurance Maps	Gas Station, Auto Repair
1955-Present	Aerial Photographs, Building Records, City Directories, Interviews, Onsite Observations, Fire Insurance Maps	Commercial

Tenants on the subject property have included Oak Beauty Salon (1941-1945); Signal Oil Company (1941-1950); Breawood Music Company (1945); Chandler Automotive Service (1945); Serrano Beauty Salon (1950); Spitz Realty (1950); Chandler & King's Auto Service (1950); Holmes Tuttle Ford (1960-1981); Holmes Tuttle Leasing (1986-1991); Cheder of LA Inc. (1997); and Herts Rent-A-Car (2016-Present).

Review of historical sources identified the subject property to have previously been developed with a gasoline service station from time from 1928 to at least 1953. Partner's experience with historical gasoline service stations indicates that full services which include fueling and automotive service/repair were commonly conducted with little to no regulatory oversight. These operations commonly utilized petroleum products, solvents, and other hazardous substances. Furthermore, other equipment such as hydraulic hoists, sumps, and oil/water clarifiers were commonly utilized in connection with such operations. No documentation pertaining to the removal or closure of the former UST systems was identified on file with the State or local regulatory agencies consulted during the course of this assessment. Regulations governing UST systems were not implemented until 1985 and regulatory documentation regarding the presence/removal of USTs prior 1988 is not typically available. Additionally, no documentation was available indicating whether soil samples have been collected and analyzed for the presence of constituents of concern, as this was not a common practice at the time the gasoline service station was decommissioned. Based on the presence of the gasoline service station on the subject property for 25 years, the absence of documentation related to UST closure and removal, and the absence of previous subsurface investigations that could confirm the presence or absence of a release from the former operations, the former gasoline service station on the subject property is considered a REC.

3.1 Aerial Photograph Review

Partner obtained available aerial photographs of the subject property and surrounding area from Environmental Risk Information Services (ERIS) on March 24, 2022. The inferred uses of the subject property and adjoining properties as interpreted from the aerial photographs in Appendix B are tabulated below:

Date:	1928	Scale:	1"=500'
Subject Property:	Appears to be developed with three commercial structures		
North:	Appears to be vacant land and developed with a residential structure across a roadway		

Date: 1928		Scale: 1" = 500'
Northeast:	Appears to be developed with a gas station across roadways	
East:	Appears to be vacant land and developed with a commercial structure across a roadway	
South:	Appears to be vacant land	
West:	Appears to be vacant land	

Date: 1938		Scale: 1" = 500'
Subject Property:	Appears to be developed with four commercial structures	
North:	Appears to be developed with commercial and residential structures across a roadway	
Northeast:	No significant changes visible	
East:	No significant changes visible	
South:	Appears to be developed with a commercial structure	
West:	Appears to be vacant land and developed with a residential structure	

Date: 1948, 1952		Scale: 1" = 500'
Subject Property:	No significant changes visible	
North:	No significant changes visible	
Northeast:	No significant changes visible	
East:	Appears to be developed with a commercial structure and an used car lot across a roadway	
South:	No significant changes visible	
West:	Appears to be developed with residential structures	

Date: 1960, 1964, 1972		Scale: 1" = 500'
Subject Property:	Appears to be developed with current structure	
North:	No significant changes visible	
Northeast:	Appears to be developed with a commercial structure across roadways	
East:	No significant changes visible	
South:	No significant changes visible	
West:	No significant changes visible	

Date: 1980		Scale: 1" = 500'
Subject Property:	No significant changes visible	
North:	No significant changes visible	
Northeast:	Appears to be developed with new commercial structures across roadways	
East:	No significant changes visible	
South:	No significant changes visible	
West:	No significant changes visible	

Date: 1989, 1994, 1995, 2005, 2010		Scale: 1" = 500'
Subject Property:	No significant changes visible	
North:	No significant changes visible	
Northeast:	No significant changes visible	
East:	Appears to be developed with a new commercial structure across a roadway	
South:	No significant changes visible	
West:	No significant changes visible	

Date: 2012, 2014, 2016, 2018, 2020 **Scale:** 1" = 500'

Subject Property: No significant changes visible
North: No significant changes visible
Northeast: Appears to be developed with a new commercial structure across a roadway
East: No significant changes visible
South: No significant changes visible
West: No significant changes visible

Copies of the aerial photographs are included in Appendix B.

3.2 Fire Insurance Maps

Partner reviewed the collection of Fire insurance maps (FIMs) from ERIS on March 24, 2022. The following inferred uses of the subject property and adjoining properties interpreted from the FIMs are tabulated below:

Date: 1926

Subject Property: Depicted as undeveloped (367 North La Brea Avenue)
North: Depicted as undeveloped across Oakwood Avenue
Northeast: Depicted as undeveloped across Oakwood Avenue and North La Brea Avenue
East: Depicted as undeveloped across North La Brea Avenue
South: Depicted as undeveloped
West: Depicted as undeveloped

Date: 1950

Subject Property: Depicted as developed with four commercial structures labeled as "Gas & Oil", "WG", "Auto Repair & Painting", and "Auto Repair (359, 361, 367 N La Brea Avenue)
North: Depicted as developed with a market and dwelling across Oakwood Avenue
Northeast: Depicted as developed with a gas station across Oakwood Avenue and North La Brea Avenue
East: Depicted as developed with two office buildings across North La Brea Avenue
South: Depicted as developed with structure occupied by store and carpet weaving
West: Depicted as developed with dwellings and flats

Date: 1969

Subject Property: Depicted as developed with a used car & truck sales with rentals with a store along the western boundary (361 North La Brea Avenue)
North: No significant changes noted
Northeast: Depicted as developed with truck rental facility with office and truck repair across North La Brea Avenue and Oakwood Avenue
East: Depicted as developed with stores and used car sales across North La Brea Avenue
South: Depicted as developed with an office building
West: No significant changes noted

The adjacent property to the northeast was developed with a gas & oil station in 1950. A discussion of this facility is included in Section 4.2.3.

Copies of reviewed FIMs are included in Appendix B.

3.3 City Directories

Partner reviewed historical city directories obtained from ERIS on March 30, 2022 for past names and businesses that were listed for the subject property and adjoining properties. The findings are tabulated below:

City Directory Search for 359-367 North La Brea Avenue (Subject Property)	
Year(s)	Occupant Listed
1927	Not listed (359 North La Brea Avenue), Not listed (361 North La Brea Avenue), Not listed (367 North La Brea Avenue)
1941	Oak Beauty Salon (359 North La Brea Avenue), Not listed (361 North La Brea Avenue), Signal Oil Company (367 North La Brea Avenue)
1945	Oak Beauty Salon (359 North La Brea Avenue), Breawood Music Company (361 North La Brea Avenue), Chandler Automotive Service, Signal Oil Company (367 North La Brea Avenue)
1950	Serrano Beauty Salon (359 North La Brea Avenue), Spitz Realty (361 North La Brea Avenue), Chandler & King's Auto Service, Signal Oil Company (367 North La Brea Avenue)
1956	Not listed (361 North La Brea Avenue)
1960	Holmes Tuttle Ford Truck Department (361 North La Brea Avenue)
1965	Holmes Tuttle Ford (361 North La Brea Avenue)
1972	Holmes Tuttle Ford, Homes Tuttle Rental (361 North La Brea Avenue)
1975	Holmes Tuttle Ford Leasing, Tuttle Holmes Ford (361 North La Brea Avenue)
1981	Holmes Tuttle Ford Leasing, Tuttle Holmes Ford (361 North La Brea Avenue)
1986	Beverly Leasing, Holmes Tuttle Leasing (361 North La Brea Avenue)
1991	Holmes Tuttle Leasing, Tuttle Enterprises (361 North La Brea Avenue)
1997	Cheder of LA Inc. (361 North La Brea Avenue)
2000-2012	Not listed (361 North La Brea Avenue)
2016	Hertz Rent-A-Car (361 North La Brea Avenue)
2020	Hertz (361 North La Brea Avenue)

According to the city directory review, the subject property has been occupied by commercial tenants since 1941. A gas station occupied the subject property from 1941 to 1950.

City Directory Search for North Adjoining Properties 401 North La Brea Ave	
Year(s)	Occupant Listed
1927	Not listed
1941-1950	Breawood Market
1956-1975	Tops Market
1981	Rapport Company Inc.
1986	The Raptor Company Inc.
1991-1997	XXXX
2000	Not listed
2003	Rapport International Home
2008-2020	Not listed

* XXXX= A phone number is present but is not registered to a tenant or is disconnected.

City Directory Search for Northeast Adjoining Properties 400 North La Brea Ave	
Year(s)	Occupant Listed
1927	Not listed

City Directory Search for Northeast Adjoining Properties 400 North La Brea Ave

Year(s)	Occupant Listed
1941-1956	Not listed
1960	American Truck Rental
1965	American U-Drive Truck Rental
1972	AM Truck Rental
1975	XXXX
1981	San Diego Federal Savings & Loan
1986-1991	Encino Savings& Loan
1997	First Federal Bank
2000	Not listed
2003-2008	First Federal Bank
2012-2020	One West Bank

* XXXX= A phone number is present but is not registered to a tenant or is disconnected.

City Directory Search for East Adjoining Properties 360 North La Brea Ave

Year(s)	Occupant Listed
1927-1945	Not listed
1950	Walling Ben F Co.
1956-1965	Multiple commercial listings
1972	LA Washer Service
1975-1981	CS Motors, Cadillac Corner
1986	Ganz Moshe Hall
1991	Congregation Mogen
1997-2020	Mikvah

City Directory Search for South Adjoining Properties 357 North La Brea Ave

Year(s)	Occupant Listed
1927-1941	Not listed
1945	Economy Carpet Company
1950	Miller Rig Company
1956	Multiple commercial listings
1960	Teleprompter Service Corporation
1965-1981	Lee Harry Enterprises
1986-1997	Jack Rutberg Fine Arts
2000	Not listed
2003-2020	Jack Rutberg Fine Arts

City Directory Search for West Adjoining Properties 360-364 North Detroit Street

Year(s)	Occupant Listed
1941-2020	Residential Listings

According to the city directory review, the adjoining properties have been occupied by residential and commercial tenants since 1941.

Copies of reviewed city directories are included in Appendix B.

3.4 Historical Topographic Maps

Partner reviewed historical topographic maps obtained from ERIS on March 24, 2022. The following inferred uses of the subject property and adjoining properties interpreted from topographic maps are tabulated below:

Date: 1894, 1896, 1898, 1900, 1902, 1920, 1921

Subject Property: Depicted as undeveloped
North: Depicted as undeveloped
Northeast: Depicted as undeveloped across a roadway
East: Depicted as undeveloped across a roadway
South: Depicted as undeveloped
West: Depicted as undeveloped

Date: 1924, 1926

Subject Property: No significant changes depicted
North: No significant changes depicted
Northeast: Depicted as developed with a residential-type structure across La Brea Avenue
East: Depicted as developed with a residential-type structure across La Brea Avenue
South: Depicted as developed with residential-type structures
West: No significant changes depicted

Date: 1953, 1966, 1972, 1981, 1991

Subject Property: Depicted as urban development
North: Depicted as urban development across Oakwood Avenue
Northeast: Depicted as urban development across Oakwood Avenue and North La Brea Avenue
East: Depicted as urban development across North La Brea Avenue
South: Depicted as urban development
West: Depicted as urban development

Copies of reviewed topographic maps are included in Appendix B.

4.0 REGULATORY RECORDS REVIEW

4.1 Regulatory Agencies

4.1.1 State Department

Regulatory Agency Data

Name of Agency: California Environmental Protection Agency (Cal/EPA)
Point of Contact: CalEPA Regulated Sites Portal
Agency Address: 1001 I Street, Sacramento, California 95814
Agency Phone Number: (916) 323-2514
Date of Contact: April 1, 2022
Method of Communication: Online: <https://siteportal.calepa.ca.gov/nsite/map/help>
Summary of Communication: No records regarding hazardous substance use, storage or releases, or the presence of USTs and AULs on the subject property were on file with the CalEPA.

4.1.2 Health Department

Regulatory Agency Data

Name of Agency: Los Angeles County Public Health Investigation (LACPHI)
Point of Contact: Administrative Assistant
Agency Address: 5555 Ferguson Drive, Suite 120-04, Commerce, CA 90022
Agency Phone Number: (323) 890-7801
Date of Contact: April 1, 2022
Method of Communication: Telephone
Summary of Communication: No records regarding hazardous substance use, storage or releases, or the presence of USTs and AULs. According to Los Angeles County Public Health Investigation, all records pertaining to the current and/or historical hazardous materials usage, storage or releases, as well as the presence of USTs, is maintained by Los Angeles County Fire Department.

4.1.3 Fire Department

Regulatory Agency Data

Name of Agency: Los Angeles Fire Department (LAFD)
Point of Contact: Online Database
Agency Address: 200 N Main Street, Suite 1700, Los Angeles, CA 90012
Agency Phone Number: (213) 978-3700
Date of Contact: April 1, 2022
Method of Communication: Online (<http://www.lafd.org/public-records>)
Summary of Communication: No records regarding hazardous substance use, storage or releases, or the presence of USTs and AULs on the subject property were on file with the LAFD.

4.1.4 Air Pollution Control Agency

Regulatory Agency Data

Name of Agency: South Coast Air Quality Management District (SCAQMD)
Point of Contact: Online Database
Agency Address: 21865 Copley Drive, Diamond Bar, California 91765
Agency Phone Number: (909) 396-2000
Date of Contact: April 1, 2022
Method of Communication: Online (<http://www3.aqmd.gov/webappl/fim/prog/search.aspx>)
Summary of Communication: No Permits to Operate (PTO), Notices of Violation (NOV), or Notices to Comply (NTC) or the presence of AULs, dry cleaning machines, or USTs were on file for the subject property with the SCAQMD.

4.1.1 State Water Resources Control Board

Regulatory Agency Data

Name of Agency: State Water Resources Control Board (SWRCB)
Point of Contact: Online Database
Agency Address: 1001 I Street, Sacramento, California 95814
Agency Phone Number: (916) 341-7365
Date of Contact: April 1, 2022
Method of Communication: Online (<http://geotracker.waterboards.ca.gov/>)
Summary of Communication: No records regarding hazardous substance use, storage or releases, or the presence of USTs and AULs on the subject property were on file with the SWRCB.

4.1.2 Department of Toxic Substances Control

Regulatory Agency Data

Name of Agency: California Department of Toxic Substances Control (DTSC)
Point of Contact: Envirostor and Hazardous Waste Tracking System (HWTS) Data Management Systems
Agency Address: 1001 I Street, Sacramento, California 95814
Agency Phone Number: (916) 255-3687
Date of Contact: April 1, 2022
Method of Communication: <https://www.envirostor.dtsc.ca.gov/public/>
https://hwts.dtsc.ca.gov/report_search.cfm?id=5
Summary of Communication: No records regarding hazardous substance use, storage or releases, or the presence of USTs and AULs on the subject property were on file with the DTSC.

According to the records reviewed, the subject property, identified as Hertz Rent-A-Car at 361 North La Brea Avenue, is listed in the HWTS database under EPA ID No. CAC002593746. This facility generated oil/water separation sludge in 2005. The subject property, identified as Hertz Rent-A-Car at 361 North La Brea Avenue, is listed in the HWTS database under EPA ID No. CAC002664915. This facility generated oil/water separation sludge in 2011. The subject property, identified as Hertz Rent-A-Car at 361 North La Brea Avenue, is listed in the HWTS database under EPA ID No. CAC002818028; no records of waste manifests were provided. The subject property, identified as Hertz at 361 North La Brea Avenue, is listed in the HWTS database under EPA ID No. CAC002989630; no records of waste manifests were provided.

4.1.3 Building Department

Regulatory Agency Data

Name of Agency: Los Angeles Building Department (LABD)
Point of Contact: Online Database
Agency Address: 201 N Figueroa Street, Los Angeles, CA 90012
Agency Phone Number: (213) 482-6862
Date of Contact: April 1, 2022
Method of Communication: Online (<http://ladbsdoc.lacity.org/ldispublic/>)
Summary of Communication: Records were available for review, as further discussed in the following table:

Building Records Reviewed for 359-367 North La Brea Ave (Subject Property)

Year(s)	Owner/Applicant	Description
1928	Newman	Relocate a service station from 501 South Vermont to 367 North La Brea Avenue (367 North La Brea Avenue)
1928	Bartram Newman	Relocate a wash rack from 501 South Vermont to 367 North La Brea Avenue (367 North La Brea Avenue)
1930	Augusta Gilles	One-story 44' x 105' auto showroom and garage (357-359 North La Brea Avenue)
1932	Jerry N B	One-story 25' x 68' auto service building (367 North La Brea)
1953	Crane Service Company	Demolish a 12' x 30' gasoline station (367 North La Brea Ave)
1953	Crane Service Company	Demolish a garage (367 North La Brea Ave)
1953	Holmes Tuttle	Addition to existing office and garage (361 North La Brea)
1955	Holmes Tuttle	One-story 288' x 100' service shop for new cars (367 North La Brea Avenue)

4.1.4 Planning Department

Regulatory Agency Data

Name of Agency: Los Angeles Planning Department (LAPD)
Point of Contact: Online Database
Agency Address: 201 N Figueroa Street, Los Angeles, CA 90012
Agency Phone Number: (213) 482-6862
Date of Contact: April 1, 2022
Method of Communication: Online (<http://zimas.lacity.org/>)
Summary of Communication: According to records reviewed, the subject property is designated as general commercial (C2-1VL) by the City of Los Angeles. According to the City of Los Angeles Department of Building and Safety and Department Planning, the subject property is located near significant oil production areas known as "Methane Zones." These areas, known as methane buffer zones, surround the methane zones. Methane buffer zone sites include sites immediately surrounding gas sources and where testing and sometimes mitigation are required by the City of Los Angeles Department of Building and Safety. Due to the potential environmental risk associated with construction in methane buffer zones, the property owner is required to conduct a methane assessment prior to the redevelopment of the subject property (Division 71 of the Los Angeles Building Code). Partner recommends that a methane assessment be conducted onsite prior to any future redevelopment activities.

4.1.5 Oil & Gas Exploration

Regulatory Agency Data

Name of Agency: California Geologic Energy Management Division (CalGEM)
Point of Contact: CalGEM Well Finder Mapping Application
Agency Address: 801 K Street, MS 24-01, Sacramento, California 95814
Agency Phone Number: (916) 322-1080
Date of Contact: April 1, 2022
Method of Communication: <https://www.conservation.ca.gov/calgem/Pages/WellFinder.aspx>
Summary of Communication: According to CalGEM, no oil or gas wells are located on or adjacent to the subject property.

4.1.6 Assessor's Office

Regulatory Agency Data

Name of Agency: Los Angeles County Assessor (LACA)
Point of Contact: Online Database
Agency Address: 500 West Temple Street, Room 225, Los Angeles, California 90012
Agency Phone Number: (213) 974-2111
Date of Contact: April 1, 2022
Method of Communication: Online (<http://maps.assessor.lacounty.gov>)
Summary of Communication: According to records reviewed, the subject property is identified by Assessor Parcel Number (APN) 5525-033-001. The current building was constructed in 1955 and totals approximately 2,975 square feet on a 0.24-acre lot.

4.1.7 Los Angeles County Fire Department

Regulatory Agency Data

Name of Agency: Los Angeles County Fire Department, Health Hazardous Materials Division
Point of Contact: Online Database
Agency Address: 1320 N Eastern Avenue, Los Angeles, California 90063
Agency Phone Number: (323) 881-2411
Date of Contact: April 1, 2022
Method of Communication: (<https://www.fire.lacounty.gov/hhmd/public-records-requests/>)
Summary of Communication: No records regarding hazardous substance use, storage or releases, or the presence of USTs and AULs on the subject property were on file with the LACFD.

Copies of pertinent documents are included in Appendix B of this report.

4.2 Mapped Database Records Search

The regulatory database report provided by Environmental Risk Information Services (ERIS) documents the listing of sites identified on federal, state, county, city, and tribal (when applicable) standard source environmental databases within the approximate minimum search distance (AMSD) specified by ASTM E1527-13 and E1527-21. The data from these sources are updated as these data are released and integrated into one database. The information contained in this report was compiled from publicly available sources.

The environmental database information is used to identify environmental concerns in connection with the subject property. The listings also serve to identify the known indications of the storage, use,

generation, disposal, or release of hazardous substance at the subject property and the potential for contaminants to migrate onto the subject property from off-site sources in groundwater or soil in the form of liquids or vapor.

Using the ASTM definition of migration, Partner considers the migration of hazardous substances or petroleum products in any form onto the subject property during the evaluation of each site listed on the radius report, which includes solid, liquid, and vapor.

4.2.1 Regulatory Database Summary

The following table lists the number of sites as categorized by the regulatory database within the prescribed AMSD. The locations of the sites are plotted utilizing a geographic information system, which geocodes the site addresses. The accuracy of the geocoded locations is approximately +/-300 feet.

Radius Report Data				
Database	AMSD Radius (mile)	Listings Identified Subject Property	Adjoining Properties	Surrounding Area Sites of Concern
Federal NPL	1.00	N	N	N
Delisted NPL Site	0.50	N	N	N
Federal SEMS Site	0.50	N	N	N
Federal SEMS-ARCHIVE	0.50	N	N	N
Federal RCRA CORRACTS Facility	1.00	N	N	N
Federal RCRA TSDF Facility	0.50	N	N	N
Federal RCRA Generators Site (LQG, SQG, VSQG, CESQG)	Subject and Adjoining	N	N	N/A
Federal IC/EC Registries	Subject Property	N	N/A	N/A
Federal ERNS Site	Subject Property	N	N/A	N/A
State/Tribal Equivalent NPL	1.00	N	N	N
State/Tribal Equivalent CERCLIS	1.00	N	N	N
State/Tribal Landfill/Solid Waste Disposal Site	0.50	N	N	N
State/Tribal Leaking Storage Tank Site (LUST/LPST)	0.50	N	N	N
State/Tribal Registered Storage Tank Sites (UST/AST)	Subject and Adjoining	N	Y	N/A
State/Tribal IC/EC Registries	Subject and Adjoining	N	N	N/A
State/Tribal Voluntary Cleanup Sites (VCP)	0.50	N	N	N
Cleanup Sites	0.50	0.50	N	N
State/Tribal Spills	0.50	0.50	N	N
Federal Brownfield Sites	0.50	0.50	N	N
State Brownfield Sites	0.50	0.50	N	N
Other State/Tribal/Local Databases	Varies	Y	N	N

4.2.2 Subject Property Listings

The subject property is identified as a HAZNET, RCRA NonGen and FINDS site in the regulatory database report, as discussed below:

- Hertz Rent-A-Car at 361 North La Brea Avenue, is listed as a HAZNET, FINDS, and RCRA NonGen site. According to RCRA NonGen and HAZNET listings, Hertz Rent-A-Car generated regulated hazardous wastes in 2005, 2011, 2015 and 2018. This facility registered in 2018 as a non-generator of hazardous substances. No violations of hazardous waste regulations are identified in the RCRA record. FINDS is typically pointers to other databases, and is used as a tracking tool by the US EPA and State agencies. The property is listed as a FINDS site in association with the above listings. No additional information was provided in the database report. Based on the regulatory status, these listings are not expected to represent a significant environmental concern.

4.2.3 Adjoining Property Listings

The adjoining property to the northeast is identified as an UST LA City site in the regulatory database report, as discussed below:

- 402 North La Brea Avenue is located hydrologically cross-gradient to the subject property. According to the database report, this site was formerly equipped with underground storage tank(s). The facility was redeveloped by 1960 with a commercial structure. It is presumed that the former station equipment and tanks were removed during re-development activity. No additional information was provided in the database report. This facility is not listed on databases indicative of a release of hazardous substances. Based on the absence of releases coupled with the location cross-gradient to the subject property, this listing is not expected to represent a significant environmental concern and it is unlikely that a file review would change the findings of this report.

Based on the findings, vapor migration is not expected to represent a significant environmental concern at this time.

4.2.4 Surrounding Area Listings of Concern to Subject Property

No sites of concern with the potential to adversely impact the subject property are identified in the regulatory database report. Based on various mitigating factors including relative distance from the subject property, inferred direction of groundwater flow, media affected, and/or regulatory status, listed sites within the specified search radius of the subject property which appeared on local, State, or Federally published lists of sites that have had releases of hazardous substances are not expected to represent a significant environmental concern.

Based on the findings, vapor migration is not expected to represent a significant environmental concern at this time.

4.2.5 Unplottable Listings

No unplottable listings of concern are identified in the regulatory database report.

A copy of the regulatory database report is included in Appendix C.

5.0 USER PROVIDED INFORMATION AND INTERVIEWS

In order to qualify for one of the *Landowner Liability Protections (LLPs)* offered by the Small Business Liability Relief and Brownfields Revitalization Act of 2001 (the *Brownfields Amendments*), the *User* must conduct the following inquiries required by 40 CFR 312.25, 312.28, 312.29, 312.30, and 312.31. The *User* should provide the following information to the *environmental professional*. Failure to provide this information could result in a determination that *all appropriate inquiries* is not complete. The *User* is asked to provide information or knowledge of the following:

- Review Title and Judicial Records for Environmental Liens and AULs
- Specialized Knowledge or Experience of the User
- Actual Knowledge of the User
- Reason for Significantly Lower Purchase Price
- Commonly Known or *Reasonably Ascertainable* information
- Degree of Obviousness
- Reason for Preparation of this Phase I ESA

Fulfillment of these user responsibilities is key to qualification for the identified defenses to CERCLA liability. Partner requested our Client to provide information to satisfy User Responsibilities as identified in Section 6 of the ASTM guidance.

Pursuant to ASTM E1527-13 and E1527-21, Partner requested the following site information from Law Offices of Bernard P. Wiesel (User of this report).

User Responsibilities		
Item	Provided By User	Not Provided By User
AAI User Questionnaire		X
Title Records, Environmental Liens, and AULs		X
Specialized Knowledge		X
Actual Knowledge		X
Valuation Reduction for Environmental Issues		X
Identification of Key Site Manager		X
Reason for Performing Phase I ESA		Refer to Section 1.1
Prior Environmental Reports		X
Other		X

5.1 Interviews

5.1.1 Interview with Owner

The owner of the subject property was not available to be interviewed at the time of the assessment.

5.1.2 Interview with Report User

Please refer to Section 5.2 below for information requested from the Report User. The information requested was not received prior to the issuance of this report.

5.1.3 Interview with Key Site Manager

Ms. Melissa Zee, key site manager, indicated that she had no information pertaining to any pending, threatened, or past litigation relevant to hazardous substances or petroleum products in, on, or from the subject property; any pending, threatened, or past administrative proceedings relevant to hazardous substances or petroleum products in, on, or from the subject property; or any notices from a governmental entity regarding any possible violation of environmental laws or possible liability relating to hazardous substances or petroleum products.

5.1.4 Interviews with Past Owners, Operators, and Occupants

Interviews with past owners, operators and occupants were not conducted since information regarding the potential for contamination at the subject property was obtained from other sources.

5.2 User Provided Information

5.2.1 Title Records, Environmental Liens, and AULs

Partner was not provided with title records or environmental lien and AUL information for review as part of this assessment.

5.2.2 Specialized Knowledge

No specialized knowledge of environmental conditions associated with the subject property was provided by the User at the time of the assessment.

5.2.3 Actual Knowledge of the User

No actual knowledge of any environmental lien or AULs encumbering the subject property or in connection with the subject property was provided by the User at the time of the assessment.

5.2.4 Valuation Reduction for Environmental Issues

No knowledge of valuation reductions associated with the subject property was provided by the User at the time of the assessment.

5.2.5 Commonly Known or Reasonably Ascertainable Information

The User did not provide information that is commonly known or *reasonably ascertainable* within the local community about the subject property at the time of the assessment.

5.2.6 Previous Reports and Other Provided Documentation

No previous reports or other pertinent documentation was provided to Partner for review during the course of this assessment.

6.0 SITE RECONNAISSANCE

The weather at the time of the site visit was sunny and clear. Refer to Section 1.5 for limitations encountered during the site reconnaissance and Sections 2.1 and 2.2 for subject property operations. The table below provides the site assessment details:

Site Assessment Data

Site Assessment Performed By: Nasim Ahmed
Site Assessment Conducted On: April 1, 2022

The table below provides the subject property personnel interviewed during the field reconnaissance:

Site Visit Personnel for 361 North La Brea Avenue (Subject Property)

Name	Title/Role	Contact Number	Site Walk* Yes/No
Melissa Zee	Key Site Manager	(310) 309-0099	Yes

* Accompanied Partner during the site reconnaissance activities and provided information pertaining to the current operations and maintenance of the subject property.

Environmental concerns were identified during the onsite reconnaissance related to onsite clarifier, as further discussed in Section 6.2.

6.1 General Site Characteristics

6.1.1 Solid Waste Disposal

Solid waste generated at the subject property is disposed of in a commercial dumpster located on the subject property. An independent solid waste disposal contractor, RecycleLA, removes solid waste from the subject property. No evidence of illegal dumping of solid waste was observed during the Partner site reconnaissance.

6.1.2 Sewage Discharge and Disposal

Sanitary discharges on the subject property are directed into the municipal sanitary sewer system. The City of Los Angeles services the subject property vicinity. No wastewater treatment facilities or septic systems were observed or reported on the subject property.

6.1.3 Stormwater and Surface Water Drainage

Stormwater is removed from the subject property primarily by sheet flow action across the paved surfaces towards stormwater drains located throughout the subject property and in the public right of way. Site stormwater drains from roofs, landscaped areas, and paved areas and is directed to on-site concrete swales, which drain to the public right of way, and to on-site stormwater drains. On-site stormwater drains discharge to a municipal owned and maintained storm sewer system.

6.1.4 Source of Heating and Cooling

Heating and cooling systems, as well as domestic hot water equipment, are fueled by electricity and provided by Los Angeles Department of Water.

6.1.5 Wells and Cisterns

No aboveground evidence of wells or cisterns was observed during the site reconnaissance.

6.1.6 Wastewater

Domestic wastewater generated at the subject property is disposed by means of the sanitary sewer system. No industrial process is currently performed at the subject property.

6.1.7 Septic Systems

No septic systems were observed or reported on the subject property.

6.1.8 Additional Site Observations

No additional general site characteristics were observed during the site reconnaissance.

6.2 Potential Environmental Hazards

6.2.1 Hazardous Substances and Petroleum Products Used or Stored at the Subject Property

Partner identified hazardous substances used, stored, and/or generated on the subject property as noted in the following table:

Hazardous Substances and/or Petroleum Products Noted Onsite						
Substance	Container Type	Quantity /Size	Location	Nature of Use	Secondary Containment	Environmental Concern
Car Wash Chemicals	Plastic	1-gallon; 5-gallon	Car Wash	Car Wash Activities	Y	N

The materials were found to be properly labeled and stored at the time of the assessment with no signs of leaks, stains, or spills. Based on the nature of use, overall small quantities observed, these materials are not expected to represent a significant environmental concern.

6.2.2 Aboveground & Underground Hazardous Substance or Petroleum Product Storage Tanks (ASTs/USTs)

No evidence of current or former ASTs or USTs was observed during the site reconnaissance.

6.2.3 Evidence of Releases

No spills, stains or other indications that a surficial release has occurred at the subject property were observed.

6.2.4 Polychlorinated Biphenyls (PCBs)-Containing Items

No potential PCB-containing equipment (transformers, oil-filled switches, hoists, lifts, dock levelers, hydraulic elevators, etc.) was observed on the subject property during Partner's reconnaissance.

6.2.5 Strong, Pungent, or Noxious Odors

No strong, pungent or noxious odors were evident during the site reconnaissance.

6.2.6 Pools of Liquid

No pools of liquid were observed on the subject property during the site reconnaissance.

6.2.7 Drains, Sumps, and Clarifiers

The subject property is equipped with one three-stage clarifier located along the southern boundary of the property. Clarifiers are used to treat waste water streams. Clarifiers are conduits to the subsurface and when utilized to treat waste water streams, can act as preferential pathways for contaminants in the waste streams. A visual assessment of the interior of the clarifier was not reasonable ascertainable and the date of installation was not identified. Clarifiers can become compromised over time and as such is considered an REC.

No drains or sumps were observed on the subject property.

6.2.8 Pits, Ponds, and Lagoons

No pits, ponds or lagoons were observed on the subject property.

6.2.9 Stressed Vegetation

No stressed vegetation was observed on the subject property.

6.2.10 Additional Potential Environmental Hazards

No additional environmental hazards, including landfill activities or radiological hazards, were observed.

6.3 Non-Scope ASTM Considerations

6.3.1 Asbestos-Containing Materials (ACMs)

Asbestos is the name given to a number of naturally occurring, fibrous silicate minerals mined for their useful properties such as thermal insulation, chemical and thermal stability, and high tensile strength. The Occupational Safety and Health Administration (OSHA) regulation 29 CFR 1926.1101 requires certain construction materials to be presumed to contain asbestos, for purposes of this regulation. All thermal system insulation (TSI), surfacing material, and asphalt/vinyl flooring that are present in a building that have not been appropriately tested are "presumed asbestos-containing material" (PACM).

The subject property building was constructed in 1955. A limited, visual evaluation of accessible areas for the presence of suspect ACMs at the subject property was conducted. The objective of this visual survey was to note the presence and condition of suspect ACM observed. Please refer to the table below for identified suspect ACMs:

Suspect ACMs			
Suspect ACM	Location	Friable Yes/No	Physical Condition
Drywall Systems	Throughout Building Interior	No	Good
Floor Tiles	Limited Areas	No	Good
Floor Tile Mastic	Limited Areas	No	Good
Ceiling Tiles	Throughout Building Interior	No	Good
Stucco	Throughout Building Exterior	No	Good

The limited visual survey consisted of noting observable materials (materials which were readily accessible and visible during the course of the site reconnaissance) that are commonly known to potentially contain asbestos. This activity was not designed to discover all sources of suspect ACM, PACM, or asbestos at the site; or to comply with any regulations and/or laws relative to planned disturbance of building materials such as renovation or demolition, or any other regulatory purpose. Rather, it is intended to give the User an indication if significant (significant due to quantity, accessibility, or condition) potential sources of ACM or PACM are present at the subject property. Additional sampling, assessment, and evaluation will be warranted for any other use.

According to the US EPA, ACM and PACM that is intact and in good condition can, in general, be managed safely in-place under an Operations and Maintenance (O&M) Program until removal is dictated by renovation, demolition, or deteriorating material condition. Prior to any disturbance of the construction materials within this facility, a comprehensive ACM survey is recommended.

6.3.2 Lead-Based Paint (LBP)

Lead is a highly toxic metal that affects virtually every system of the body. LBP is defined as any paint, varnish, stain, or other applied coating that has 1 mg/cm² (or 5,000 ug/g or 0.5% by weight) or more of lead. Congress passed the Residential Lead-Based Paint Hazard Reduction Act of 1992, also known as "Title X", to protect families from exposure to lead from paint, dust, and soil. Under Section 1017 of Title X, intact LBP on most walls and ceilings is not considered a "hazard," although the condition of the paint should be monitored and maintained to ensure that it does not become deteriorated. Further, Section 1018 of this law directed the Housing and Urban Development (HUD) and the US EPA to require the disclosure of known information on LBP and LBP hazards before the sale or lease of most housing built before 1978.

Based on the age of the subject property building (pre-1978), there is a potential that LBP is present. Interior and exterior painted surfaces were observed in good condition and therefore not expected to represent a "hazard," although the condition of the paint should be monitored and maintained to ensure that it does not become deteriorated.

6.3.3 Radon

Radon is a colorless, odorless, naturally occurring, radioactive, inert, gaseous element formed by radioactive decay of radium (Ra) atoms. The US EPA has prepared a map to assist National, State, and local organizations to target their resources and to implement radon-resistant building codes. The map divides the country into three Radon Zones, according to the table below:

EPA Radon Zones		
EPA Zones	Average Predicted Radon Levels	Potential
Zone 1	Exceed 4.0 pCi/L	Highest
Zone 2	Between 2.0 and 4.0 pCi/L	Moderate
Zone 3	Less than 2.0 pCi/L	Low

It is important to note that the EPA has found homes with elevated levels of radon in all three zones, and the US EPA recommends site-specific testing in order to determine radon levels at a specific location.

However, the map does give a valuable indication of the propensity of radon gas accumulation in structures.

Radon sampling was not conducted as part of this assessment. Review of the US EPA Map of Radon Zones places the subject property in Zone 2. Based upon the radon zone classification, radon is not considered to be a significant environmental concern.

6.3.4 Lead in Drinking Water

According to available information, a public water system operated by the Los Angeles Department of Water and Power serves the subject property vicinity. According to Los Angeles Department of Water and Power, the sources of public water for the City of Los Angeles are surface waters from the State Water Project (including 22 dams and reservoirs), Colorado River, Owens River, Mono Lake Basin, and approximately 30-percent comes from groundwater sources. According to the 2020 Annual Water Quality Report, water supplied to the subject property is in full compliance with all State and Federal regulations pertaining to drinking water standards, including lead and copper. Water sampling was not conducted to verify water quality.

6.3.5 Mold

Molds are microscopic organisms found virtually everywhere, indoors and outdoors. Mold will grow and multiply under the right conditions, needing only sufficient moisture (e.g. in the form of very high humidity, condensation, or water from a leaking pipe, etc.) and organic material (e.g., ceiling tile, drywall, paper, or natural fiber carpet padding).

Partner observed accessible, interior areas for the subject property building for significant evidence of mold growth with the exceptions detailed in Section 1.5 of this report; however, this ESA should not be used as a mold survey or inspection. Additionally, this limited assessment was not designed to assess all areas of potential mold growth that may be affected by mold growth on the subject property. Rather, it is intended to give the client an indication as to whether or not conspicuous (based on observed areas) mold growth is present at the subject property. This evaluation did not include a review of pipe chases, mechanical systems, or areas behind enclosed walls and ceilings.

No obvious indications of water damage or mold growth were observed during Partner's visual assessment.

6.3.6 Wetlands

The subject property does not appear to be a designated wetland area, based on information obtained from the United States Fish & Wildlife Service; however, a comprehensive wetlands survey would be required in order to formally determine actual wetlands on the subject property. No surface impoundments, wetlands, natural catch basins, settling ponds, or lagoons are located on the subject property.

6.4 Adjoining Property Reconnaissance

The adjoining property reconnaissance consisted of observing the adjoining properties from the subject property premises.

6.4.1 PCBs

Pole-mounted transformers were observed on the adjoining properties. No staining or leakage was observed in the vicinity of the transformers. Based on these observations, the presence of adjoining transformers is not expected to represent a significant environmental concern.

7.0 VAPOR ENCROACHMENT CONDITIONS

Partner conducted a limited non-intrusive vapor screening on the subject property to identify, to the extent feasible, the potential for vapor encroachment conditions (VECs) in connection with the subject property. This included consideration of chemicals of concern (COC) that may migrate as vapors into the subsurface of the subject property as a result of contaminated soil and groundwater on or near the property.

This screening utilized readily available data sources previously discussed in this Phase I ESA that includes:

- the physical setting of the subject property (Section 2.4),
- standard historical sources for the subject property, adjoining, and surrounding area (Section 3.0),
- known or potentially contaminated sites as identified from information from regulatory agencies and sites on Federal, State, tribal and local databases (Section 4.0), and
- information from the site reconnaissance (Section 6.0) of the subject property and observations of the surrounding properties.

The results of our data collection, reconnaissance, and analysis are tabulated below:

<i>Potential for Vapor Encroachment to Impact the Subject Property</i>	
Area of Concern	Likely or Known VEC to Subject Property
Subject Property Existing Operations or Conditions	Refer to 6.0 Site Reconnaissance and discussion below.
Historical Uses of the Subject Property	Refer to Section 3.0 Historical Use and discussion below.
Adjoining Property Operations or Existing Conditions	None identified that impact the subject property.
Historical Uses of Adjoining Properties or Nearby Properties	None identified that impact the subject property.
Regulatory Review of sites identified on Federal, State, tribal and Local Environmental Databases which were located in the AMSD	None identified that impact the subject property

8.0 FINDINGS AND CONCLUSIONS

Findings and Opinions

Recognized Environmental Condition

A REC refers to the presence of hazardous substances or petroleum products in, on, or at the subject property due to a release to the environment; the likely presence of hazardous substances or petroleum products in, on, or at the subject property due to a release or likely release to the environment; or the presence of hazardous substances or petroleum products in, on, or at the subject property under conditions that pose a material threat of a future release to the environment. The following was identified during the course of this assessment:

- Review of historical sources identified the subject property to have previously been developed with a gasoline service station from time from 1928 to at least 1953. Partner's experience with historical gasoline service stations indicates that full services which include fueling and automotive service/repair were commonly conducted with little to no regulatory oversight. These operations commonly utilized petroleum products, solvents, and other hazardous substances. Furthermore, other equipment such as hydraulic hoists, sumps, and oil/water clarifiers were commonly utilized in connection with such operations. No documentation pertaining to the removal or closure of the former UST systems was identified on file with the State or local regulatory agencies consulted during the course of this assessment. Regulations governing UST systems were not implemented until 1985 and regulatory documentation regarding the presence/removal of USTs prior 1988 is not typically available. Additionally, no documentation was available indicating whether soil samples have been collected and analyzed for the presence of constituents of concern, as this was not a common practice at the time the gasoline service station was decommissioned. Based on the presence of the gasoline service station on the subject property for 25 years, the absence of documentation related to UST closure and removal, and the absence of previous subsurface investigations that could confirm the presence or absence of a release from the former operations, the former gasoline service station on the subject property is considered a REC.
- The subject property is equipped with one three-stage clarifier located along the southern boundary of the property. Clarifiers are used to treat waste water streams. Clarifiers are conduits to the subsurface and when utilized to treat waste water streams, can act as preferential pathways for contaminants in the waste streams. A visual assessment of the interior of the clarifier was not reasonable ascertainable and the date of installation was not identified. Clarifiers can become compromised over time and as such is considered an REC.

Controlled Recognized Environmental Condition

A CREC refers to a REC affecting the subject property that has been addressed to the satisfaction of the applicable regulatory authority or authorities with hazardous substances or petroleum products allowed to remain in place subject to implementation of required controls (for example, activity and use limitations or other property use limitations). The following was identified during the course of this assessment:

- Partner did not identify evidence of CRECs during the course of this assessment.

Historical Recognized Environmental Condition

A HREC refers to a previous release of hazardous substances or petroleum products affecting the subject property that has been addressed to the satisfaction of the applicable regulatory authority or authorities and meeting unrestricted use criteria established by the applicable regulatory authority or authorities without subjecting the subject property to any controls (for example, activity and use limitations or other property use limitations). The following was identified during the course of this assessment:

- Partner did not identify evidence of HRECs during the course of this assessment.

Business Environmental Risk

A BER is a risk which can have a material environmental or environmentally driven impact on the business associated with the current or planned use of commercial real estate, not necessarily related to those environmental issues required to be investigated in this practice. The following was identified during the course of this assessment:

- According to the City of Los Angeles Department of Building and Safety and Department Planning, the subject property is located near significant oil production areas known as "Methane Zones." These areas, known as methane buffer zones, surround the methane zones. Methane buffer zone sites include sites immediately surrounding gas sources and where testing and sometimes mitigation are required by the City of Los Angeles Department of Building and Safety. Due to the potential environmental risk associated with construction in methane buffer zones, the property owner is required to conduct a methane assessment prior to the redevelopment of the subject property (Division 71 of the Los Angeles Building Code).
- Due to the age of the subject property building, there is a potential that asbestos-containing materials (ACMs) are present. Readily visible suspect ACMs were observed in good condition. However, should these materials be replaced, the identified suspect ACMs would need to be sampled to confirm the presence or absence of asbestos prior to any renovation or demolition activities to prevent potential exposure to workers and/or building occupants.

Significant Data Gaps

No significant data gaps affecting the ability of the Environmental Professional to identify a REC were encountered during this assessment.

Conclusions and Recommendations

Partner has performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E1527-13 and E1527-21 of 361 North La Brea Avenue in Los Angeles, Los Angeles County, California (the "subject property"). Any exceptions to, or deletions from, this practice are described in Section 1.5 of this report.

This assessment has revealed evidence of RECs and BERs in connection with the subject property. Based on the conclusions of this assessment, Partner recommends the following:

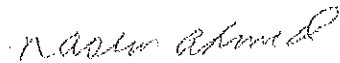
- A limited subsurface investigation should be conducted in order to determine the presence or absence of soil, soil vapor, and/or groundwater contamination due to the historical use of the subject property.
- Prior to any renovations or demolition activities at the subject property, a comprehensive asbestos survey is recommended. If such materials are identified and need to be disturbed, repaired or removed, a licensed abatement contractor should be consulted. .

9.0 SIGNATURES OF ENVIRONMENTAL PROFESSIONALS

Partner has performed a Phase I Environmental Site Assessment of the property located at 361 North La Brea Avenue in Los Angeles County, California in conformance with the scope and limitations of the protocol and the limitations stated earlier in this report. Exceptions to or deletions from this protocol are discussed earlier in this report.

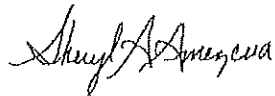
By signing below, Partner declares that, to the best of our professional knowledge and belief, we meet the definition of *Environmental Professional* as defined in §312.10 of 40 CFR §312. Partner has the specific qualifications based on education, training, and experience to assess a *property* of the nature, history, and setting of the subject *property*. Partner has developed and performed the all-appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.

Prepared By:



Nasim Ahmed, REPA
Environmental Professional

Reviewed By:



Sheryl A. Amezcua
Senior Author



Robert Vaughn
National Client Manager

10.0 REFERENCES

Reference Documents

American Society for Testing and Materials, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process, ASTM Designation: E1527-13.

Environmental Data Resources, Aerial Photo Decade Package, March 2022

Environmental Data Resources, Certified Sanborn® Map Report, March 2022

Environmental Data Resources, City Directory Image Report, March 2022

Environmental Data Resources, Historical Topo Map Report, March 2022

Environmental Data Resources, Radius Map™ Report, March 2022

Federal Emergency Management Agency, Federal Insurance Administration, National Flood Insurance Program, Flood Insurance Map, accessed via the internet, March 2022

United States Department of Agriculture, Natural Resources Conservation Service, accessed via the internet, March 2022

United States Department of Agriculture, Natural Resources Conservation Service, Web Soil Survey, accessed via the internet, March 2022

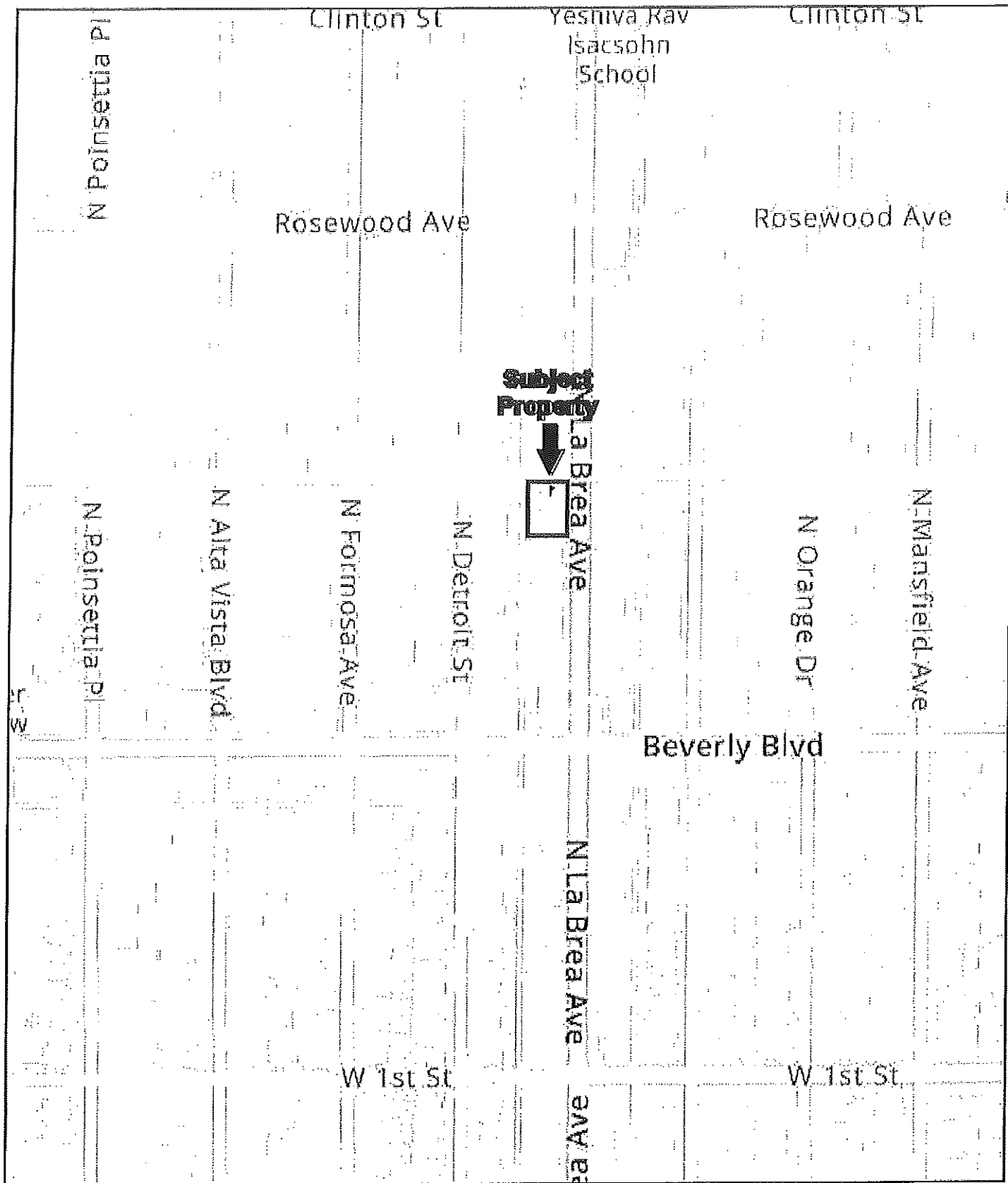
United States Environmental Protection Agency, EPA Map of Radon Zones (Document EPA-402-R-93-071), accessed via the internet, March 2022

United States Geological Survey, accessed via the internet, March 2022

United States Geological Survey Topographic Map 2012, 7.5-minute series, accessed via the internet, March 2022.

FIGURES

- 1 SITE LOCATION MAP
- 2 SITE PLAN
- 3 TOPOGRAPHIC MAP



Drawing Not To Scale

KEY:

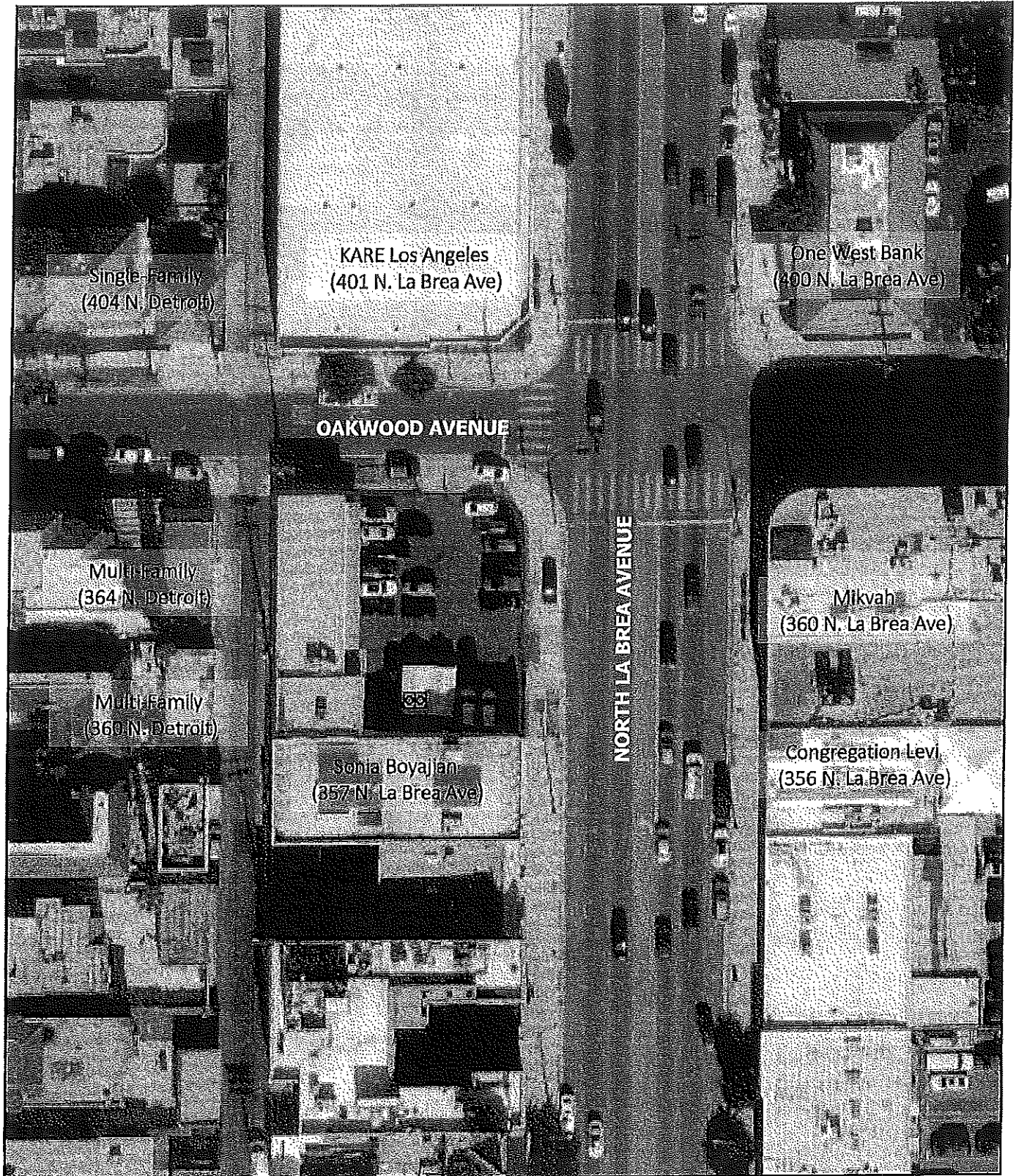
Subject Property



FIGURE 1: SITE LOCATION MAP

Project No. 22-362989.1

PARTNER





KEY:
 Subject Property 
 Clarifier 

FIGURE 2: SITE PLAN
 Project No. 22-362989.1

PARTNER

Exhibit B.4

Environmental Documents (ENV-2024-5978-CE)

Soils Approval Letter



SOILS REPORT APPROVAL LETTER

September 11, 2023

LOG # 127525
SOILS/GEOLOGY FILE - 2

Samuel Einhorn
11627 Telegraph Rd.
Santa Fe Springs, CA 90067

TRACT: TR 4924
LOT(S): 1 & 2
LOCATION: 361 N. La Brea Ave.

<u>CURRENT REFERENCE</u> <u>REPORT/LETTER(S)</u>	<u>REPORT</u> <u>No.</u>	<u>DATE OF</u> <u>DOCUMENT</u>	<u>PREPARED BY</u>
Soils Report	3092-34	07/21/2023	Feffer Geological Consulting
Oversized Doc(s).	"	"	"
Laboratory Test Report	70990.149	07/26/2023	HD Geosolutions Inc.

The Grading Division of the Department of Building and Safety has reviewed the referenced report that provides recommendations for the proposed 5-story mixed use development building over one-story on-grade parking garage. No basement or retaining walls are proposed. The earth materials at the subsurface exploration locations consist of up to 2 feet of uncertified fill underlain by native soils. The consultants recommend to support the proposed structure(s) on conventional foundations bearing on native undisturbed soils or a blanket of properly placed compacted fill a minimum of 3 feet thick.

Groundwater was not encountered during exploration to a depth of 31 feet below the existing grade and the historically highest groundwater level in the area is approximately 10 feet below the ground surface, according to the consultants.

Engineering analyses provided by Feffer Geological Consulting is based on laboratory testing performed by HD Geosolutions Inc. Feffer Geological Consulting is accepting responsibility for use of the data in accordance to Code section 91.7008.5 of LABC.

The referenced report is acceptable, provided the following conditions are complied with during site development:

(Note: Numbers in parenthesis () refer to applicable sections of the 2023 City of LA Building Code. P/BC numbers refer to the applicable Information Bulletin. Information Bulletins can be accessed on the internet at LADBS.ORG.)

1. ABC slot recommendations is not approved in this letter. In the event ABC slot cut is proposed, a supplemental report including ABC slot-cut calculations considering the maximum height and width of the slot, and surcharge load from the existing foundation shall be submitted to the Department for review.
2. Approval shall be obtained from the Department of Public Works, Bureau of Engineering, Development Services and Permits Program where removal of support and/or retaining of slopes adjoining to a public way is proposed (3307.3.2).

201 N. Figueroa Street 3rd Floor, LA (213) 482-7045

3. The soils engineer shall review and approve the detailed plans prior to issuance of any permit. This approval shall be by signature on the plans that clearly indicates the soils engineer has reviewed the plans prepared by the design engineer; and, that the plans included the recommendations contained in their reports (7006.1).
4. All recommendations of the report(s) that are in addition to or more restrictive than the conditions contained herein shall be incorporated into the plans.
5. A copy of the subject and appropriate referenced reports and this approval letter shall be attached to the District Office and field set of plans (7006.1). Submit one copy of the above reports to the Building Department Plan Checker prior to issuance of the permit.
6. A grading permit shall be obtained for all structural fill (106.1.2).
7. All man-made fill shall be compacted to a minimum 90 percent of the maximum dry density of the fill material per the latest version of ASTM D 1557. Where cohesionless soil having less than 15 percent finer than 0.005 millimeters is used for fill, it shall be compacted to a minimum of 95 percent relative compaction based on maximum dry density. Placement of gravel in lieu of compacted fill is only allowed if complying with LAMC Section 91.7011.3.
8. If import soils are used, no footings shall be poured until the soils engineer has submitted a compaction report containing in-place shear test data and settlement data to the Grading Division of the Department; and, obtained approval (7008.2).
9. Compacted fill shall extend beyond the footings a minimum distance equal to the depth of the fill below the bottom of footings or a minimum of three feet whichever is greater (7011.3).
10. Existing uncertified fill shall not be used for support of footings, concrete slabs or new fill (1809.2, 7011.3).
11. Drainage in conformance with the provisions of the Code shall be maintained during and subsequent to construction (7013.12).
12. Grading shall be scheduled for completion prior to the start of the rainy season, or detailed temporary erosion control plans shall be filed in a manner satisfactory to the Grading Division of the Department and the Department of Public Works, Bureau of Engineering, B-Permit Section, for any grading work in excess of 200 cubic yards (7007.1).

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13. All loose foundation excavation material shall be removed prior to commencement of framing (7005.3).
14. The applicant is advised that the approval of this report does not waive the requirements for excavations contained in the General Safety Orders of the California Department of Industrial Relations (3301.1).
15. Temporary excavations that remove lateral support to the public way, adjacent property, or adjacent structures shall be supported by shoring. Note: Lateral support shall be considered to be removed when the excavation extends below a plane projected downward at an angle of 45 degrees from the bottom of a footing of an existing structure, from the edge of the public way or an adjacent property. (3307.3.1)
16. Where any excavation, not addressed in the approved reports, would remove lateral support (as defined in 3307.3.1) from a public way, adjacent property or structures, a supplemental report shall be submitted to the Grading Division of the Department containing recommendations for shoring, underpinning, and sequence of construction. Report shall include a plot plan and cross-section(s) showing the construction type, number of stories, and location of adjacent structures, and analysis incorporating all surcharge loads that demonstrate an acceptable factor of safety against failure. (7006.2 & 3307.3.2)
17. Prior to the issuance of any permit that authorizes an excavation where the excavation is to be of a greater depth than are the walls or foundation of any adjoining building or structure and located closer to the property line than the depth of the excavation, the owner of the subject site shall provide the Department with evidence that the adjacent property owner has been given a 30-day written notice of such intent to make an excavation (3307.1).
18. The soils engineer shall review and approve the shoring plans prior to issuance of the permit (3307.3.2).
19. Prior to the issuance of the permits, the soils engineer and the structural designer shall evaluate the surcharge loads used in the report calculations for the design of shoring. If the surcharge loads used in the calculations do not conform to the actual surcharge loads, the soil engineer shall submit a supplementary report with revised recommendations to the Department for approval.
20. Unsurcharged temporary excavations over 5 feet exposing soil shall be trimmed back at a gradient not exceeding 1:1, as recommended.
21. Shoring shall be designed for the lateral earth pressures specified in the section titled "Shoring" starting on page 14 of the 07/21/2023 report; all surcharge loads shall be included into the design.
22. Shoring shall be designed for a maximum lateral deflection of 1 inch, provided there are no structures within a 1:1 plane projected up from the base of the excavation. Where a structure is within a 1:1 plane projected up from the base of the excavation, shoring shall be designed for a maximum lateral deflection of ½ inch, or to a lower deflection determined by the consultant that does not present any potential hazard to the adjacent structure.
23. A shoring monitoring program shall be implemented to the satisfaction of the soils engineer.

24. All foundations shall derive entire support from native undisturbed soils, or a blanket of properly placed compacted fill a minimum of 3 feet thick, as recommended and approved by the soils engineer by inspection.
25. Footings supported on approved compacted fill or expansive soil shall be reinforced with a minimum of four (4), ½-inch diameter (#4) deformed reinforcing bars. Two (2) bars shall be placed near the bottom and two (2) bars placed near the top of the footing.
26. The foundation/slab design shall satisfy all requirements of the Information Bulletin P/BC 2017-116 "Foundation Design for Expansive Soils" (1803.5.3).
27. Slabs placed on approved compacted fill shall be at least 3½ inches thick and shall be reinforced with ½-inch diameter (#4) reinforcing bars spaced a maximum of 16 inches on center each way.
28. Concrete floor slabs placed on expansive soil shall be placed on a 4-inch fill of coarse aggregate or on a moisture barrier membrane. The slabs shall be at least 3½ inches thick and shall be reinforced with ½-inch diameter (#4) reinforcing bars spaced a maximum of 16 inches on center each way.
29. The seismic design shall be based on a Site Class D, as recommended. All other seismic design parameters shall be reviewed by LADBS building plan check. According to ASCE 7-16 Section 11.4.8, for structures on Site Class D sites with S1 greater than or equal to 0.2, the parameter SM1 determined by EQ. (11.4-2) shall be increased by 50%. Alternatively, a supplemental report containing a site-specific ground motion hazard analysis in accordance with ASCE 7-16 Section 21.2 shall be submitted for review and approval.
30. The structure shall be connected to the public sewer system per P/BC 2020-027.
31. All roof, pad and deck drainage shall be conducted to the street in an acceptable manner in non-erosive devices or other approved location in a manner that is acceptable to the LADBS and the Department of Public Works (7013.10).
32. All concentrated drainage shall be conducted in an approved device and disposed of in a manner approved by the LADBS (7013.10).
33. The soils engineer shall inspect all excavations to determine that conditions anticipated in the report have been encountered and to provide recommendations for the correction of hazards found during grading (7008, 1705.6 & 1705.8).
34. Prior to pouring concrete, a representative of the consulting soils engineer shall inspect and approve the footing excavations. The representative shall post a notice on the job site for the LADBS Inspector and the Contractor stating that the work inspected meets the conditions of the report. No concrete shall be poured until the LADBS Inspector has also inspected and approved the footing excavations. A written certification to this effect shall be filed with the Grading Division of the Department upon completion of the work. (108.9 & 7008.2)
35. Prior to excavation an initial inspection shall be called with the LADBS Inspector. During the initial inspection, the sequence of construction; shoring; protection fences; and, dust and traffic control will be scheduled (108.9.1).

36. Installation of shoring shall be performed under the inspection and approval of the soils engineer and deputy grading inspector (1705.6, 1705.8).
37. Prior to the placing of compacted fill, a representative of the soils engineer shall inspect and approve the bottom excavations. The representative shall post a notice on the job site for the LADBS Inspector and the Contractor stating that the soil inspected meets the conditions of the report. No fill shall be placed until the LADBS Inspector has also inspected and approved the bottom excavations. A written certification to this effect shall be included in the final compaction report filed with the Grading Division of the Department. All fill shall be placed under the inspection and approval of the soils engineer. A compaction report together with the approved soil report and Department approval letter shall be submitted to the Grading Division of the Department upon completion of the compaction. In addition, an Engineer's Certificate of Compliance with the legal description as indicated in the grading permit and the permit number shall be included (7011.3).
38. No footing/slab shall be poured until the compaction report is submitted and approved by the Grading Division of the Department.
39. A supplemental report shall be provided in the event any deviation to the currently proposed project configuration, as presented and as shown in the plans and cross sections included in the approved reports, is made. This shall include but not limited to: relocation, change in any dimension, change in the number of stories above or below grade of any of the proposed structures; addition of any structure(s), such as retaining walls, decks, swimming pools, driveways, access roads, living quarters, etc.; or, additional permanent grading or temporary grading for construction purposes that are not described and not shown in the plans and cross sections included in the approved reports.

LEILA ETAAT
Structural Engineering Associate III

LE/le
Log No. 127525
213-482-0480

cc: Applicant
Feffer Geological Consulting, Project Consultant
HD Geosolutions Inc., Project Consultant
LA District Office

CITY OF LOS ANGELES
DEPARTMENT OF BUILDING AND SAFETY
Grading Division

District <u>LA</u>	Log No. <u>127575</u>
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APPLICATION FOR REVIEW OF TECHNICAL REPORTS

INSTRUCTIONS

- A. Address all communications to the Grading Division, LADBS, 221 N. Figueroa St., 12th Fl., Los Angeles, CA 90012
Telephone No. (213)482-0480.
- B. Submit two copies (three for subdivisions) of reports, one "pdf" copy of the report on a CD-Rom or flash drive,
and one copy of application with items "1" through "10" completed.
- C. Check should be made to the City of Los Angeles.

1. LEGAL DESCRIPTION

Tract: 4924

Block: _____ Lots: 1,2

3. OWNER: Samuel Einhorn

Address: 11627 Telegraph Road, Suite 200

City: Santa Fe Springs Zip: 90067

Phone (Daytime): _____

2. PROJECT ADDRESS:

361 N La Brea Ave

4. APPLICANT Feffer Geological Consulting

Address: 1990 S Bundy Drive Suite 400

City: Los Angeles Zip: 90025

Phone (Daytime): 3102075048

E-mail address: eleni@feffergeo.com, jerry@feffergeo.com

5. Report(s) Prepared by:

Feffer Geological Consulting

6. Report Date(s):

July 21, 2023

7. Status of project:

☒ Proposed

☐ Under Construction

☐ Storm Damage

8. Previous site reports?

☐ YES

if yes, give date(s) of report(s) and name of company who prepared report(s)

9. Previous Department actions?

☐ YES

if yes, provide dates and attach a copy to expedite processing.

Dates: _____

10. Applicant Signature: Gerardo Hernandez

Position: Staff Geologist

(DEPARTMENT USE ONLY)

REVIEW REQUESTED	FEES	REVIEW REQUESTED	FEES
<input checked="" type="checkbox"/> Soils Engineering	<u>363.00</u>	No. of Lots	
<input type="checkbox"/> Geology		No. of Acres	
<input type="checkbox"/> Combined Soils Engr. & Geol.		<input type="checkbox"/> Division of Land	
<input type="checkbox"/> Supplemental		Other	
<input type="checkbox"/> Combined Supplemental		<input checked="" type="checkbox"/> Expedite	<u>181.50</u>
<input type="checkbox"/> Import-Export Route		<input type="checkbox"/> Response to Correction	
Cubic Yards: _____		<input type="checkbox"/> Expedite ONLY	
		Sub-total	<u>544.50</u>
		Surcharge	<u>129.80</u>
		TOTAL FEE	<u>674.30</u>

Fee Due: 674.30
Fee Verified By: LMA Date: 8/22/23
(Cashier Use Only)

1655739 8/22/23

ACTION BY:

THE REPORT IS:

☐ NOT APPROVED

☐ APPROVED WITH CONDITIONS

☐ BELOW

☐ ATTACHED

For Geology

Date

For Soils

Date

Exhibit C.1

Maps - Vicinity Map

VICINITY MAP

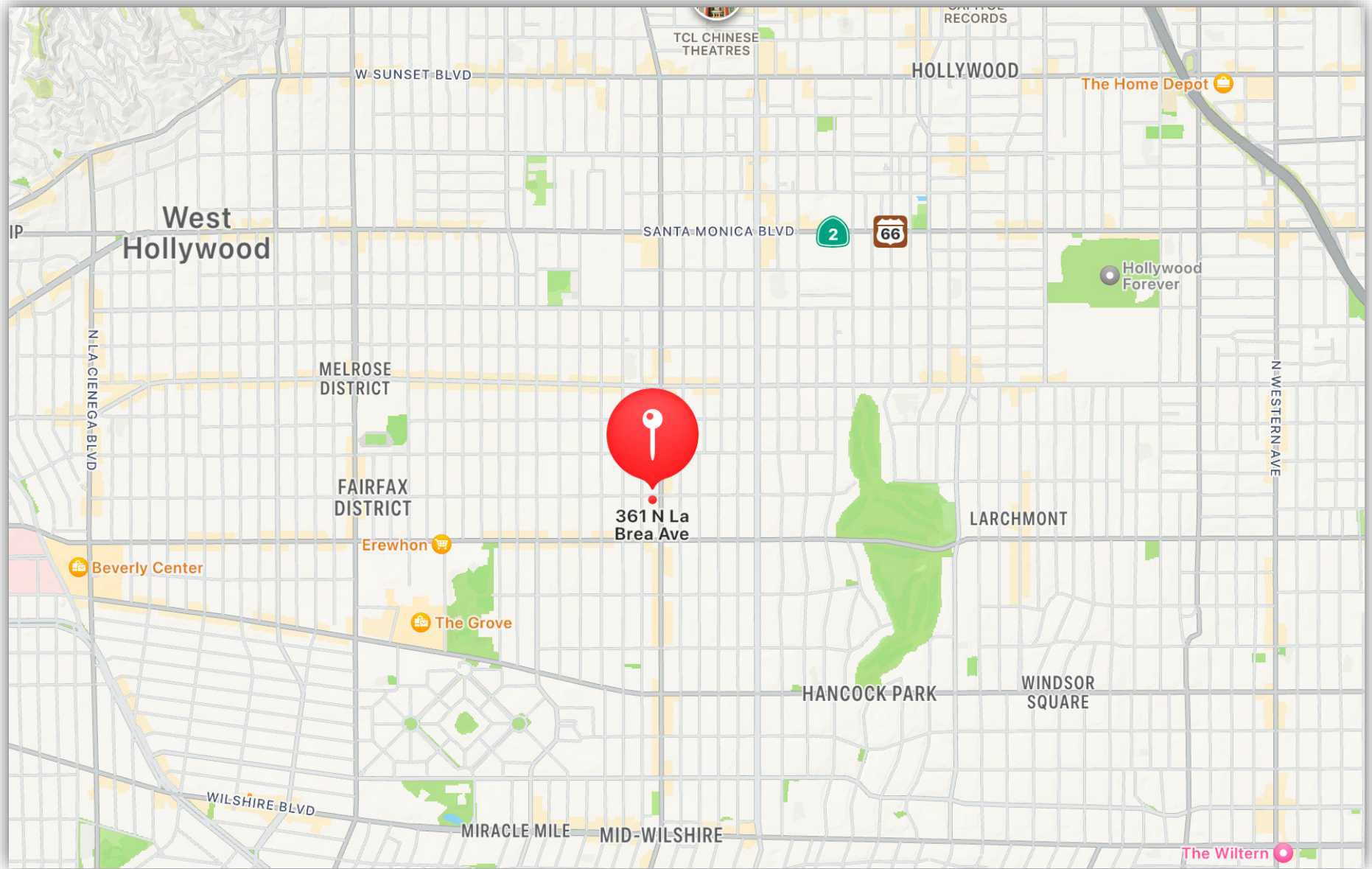


Exhibit C.2

Maps - Radius Map

ZIMAS PUBLIC ABUTTING OWNERSHIP MAP

City of Los Angeles
Department of City Planning



Address: undefined
APN: 5525033001
PIN #: 138B181 89

Tract: TR 4924
Block: None
Lot: 1
Arb: None

Zoning: C2-1VL
General Plan: General Commercial

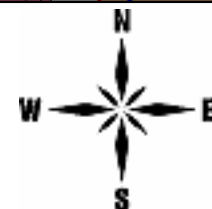
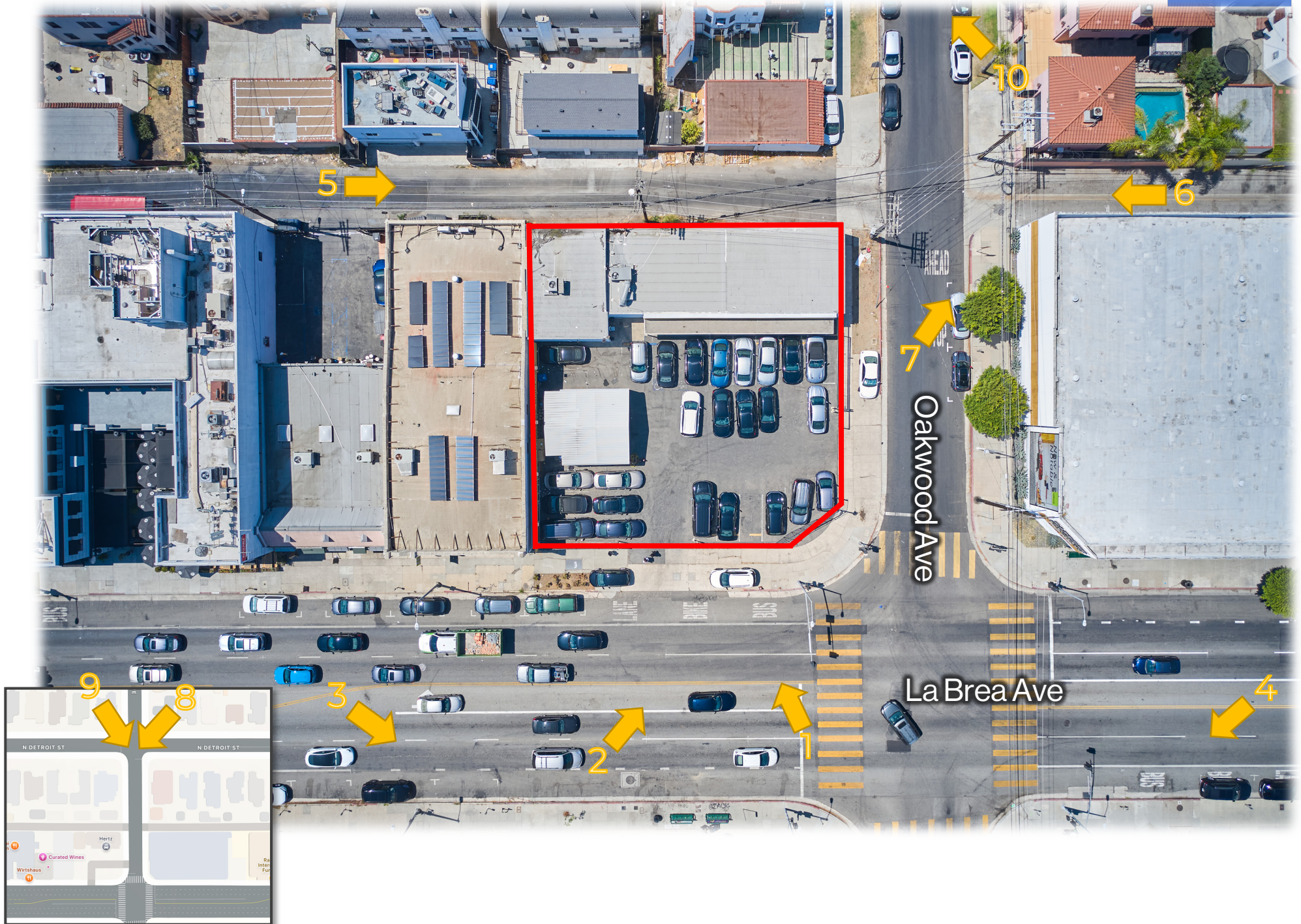


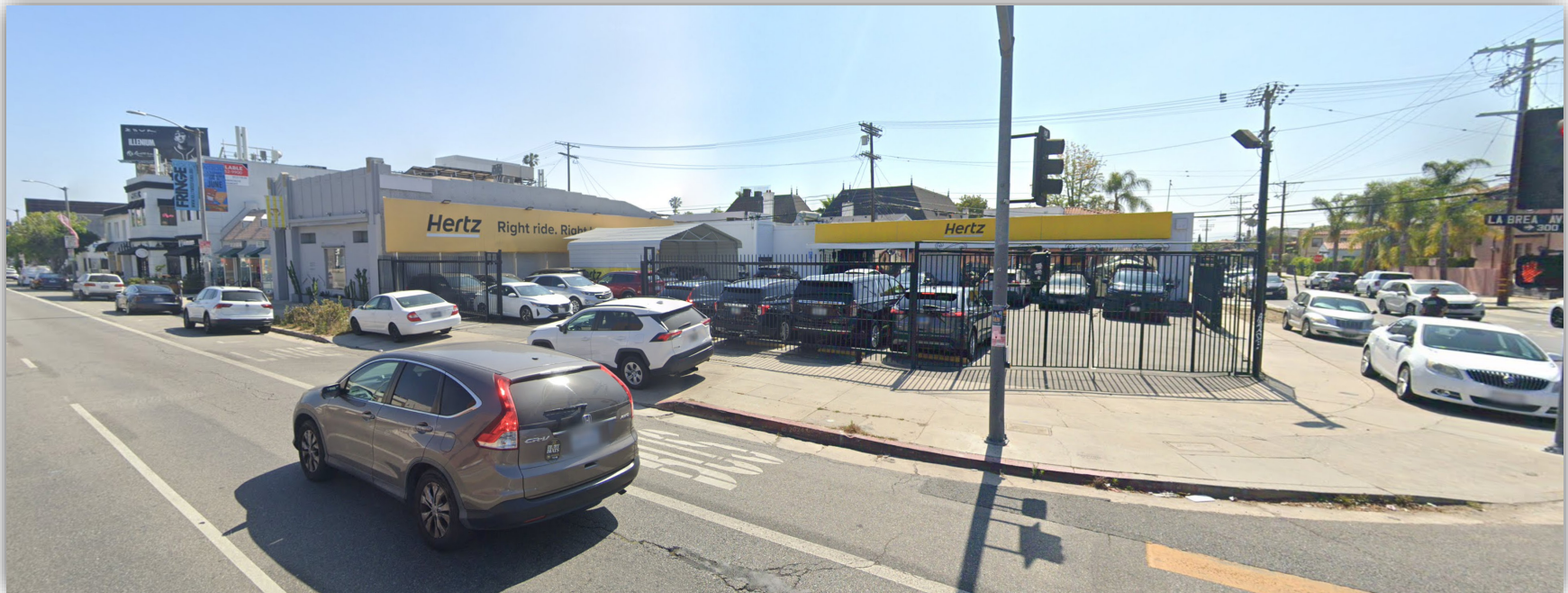
Exhibit D

Site and Surrounding Area Photos

PHOTO INDEX MAP

nūr





Index Map Photo #1



Index Map Photo #2



Index Map Photo #3



Index Map Photo #4



Index Map Photo #5



Index Map Photo #6



Index Map Photo #7



Index Map Photo #8



Index Map Photo #9



Index Map Photo #10

Exhibit E

Public Correspondence



Bryant Wu <bryant.wu@lacity.org>

Apartment building at La Brea and Rosewood

1 message

Irwin Lowi <abpf@ix.netcom.com>
To: Bryant.wu@lacity.org
Cc: Rabbi Bess <rgbess@gmail.com>

Thu, Jan 23, 2025 at 8:14 AM

Dear Sir:

As a resident living on Orange, I must protest this huge development. Withe the increased restrictions on La Brea we have even more congestion and parking difficulties for residents. Adding so many apartments in one building will exacerbate the already difficult intersection. The doesn't specify how many spots will be underground for residents of the building. Why not? Will there employees for the retail first floor? Where will the park? Lastly was environmental impact report done the probability of soil contamination do to the onsite current business? Thank you for your consideration.

Irwin Lowi

304 N Orange Dr

LA, 90036

ABP Insurance Agency

6404 WILSHIRE BLVD.

SUITE 1215

LOS ANGELES, CA 90048

OFFICE 323-658-7733

TOLL FREE FAX 866-848-5669



Bryant Wu <bryant.wu@lacity.org>

Opposition to exemptions requested for 361 N. La Brea Avenue, CPC-2024-5977-DB-VHCA

1 message

Ken Weinberg <kiweinberg613@gmail.com>
To: Bryant.Wu@lacity.org

Thu, Jan 23, 2025 at 5:04 AM

Los Angeles Department of City Planning

[200 N. Spring Street](#)

[Los Angeles, CA 90012](#)

I am writing to oppose the exemptions requested for the proposed new development at [361 N. La Brea Avenue, Los Angeles](#). Case Number: CPC-2024-5977-DB-VHCA, Environmental Case Number: ENV-2024-5978-CE.

The project as designed will add 40 new units and retail space on a commercial street that runs through a residential neighborhood consisting of primarily owner-occupied single family homes and duplexes. This magnitude of this structure is far greater than any other buildings nearby, and will change the character of our neighborhood.

This appears to be an attempt by a multi-million dollar corporation to profit off loopholes in the various codes at the expense of regular homeowners.

It also sets a bad precedent for other developers who realize that by utilizing loopholes in various regulations, they can circumvent the protections designed to provide affordable housing. For example, the applicant claims they are setting aside 5 units for very low income households, they also point out that this building will not be subject to the Rent Stabilization Ordinance (RSO), so they are free to raise rents to market levels after the first year.

Traffic in this area is extremely busy including the streets in direct proximity to the proposed project. The residential streets such as Oakwood Avenue, are often full for blocks by people avoiding the major streets (e.g., Beverly Blvd).

Parking is already scarce and exceeds 85% of legal on-street parking occupied as certified by the city's parking study to establish Preferential Parking District (PPD) 47. Allowing the extra units that are requested through these exemptions puts additional strains on the traffic and parking, in excess of those allowed by AB 2097. Adding 60 cars (Average 1½ per apartment x 40 apartments) would put an excessive strain on our neighborhood, since parking is not permitted or severely restricted on La Brea Ave most of the day.

The proposed height also presents privacy concerns for the residences across the alley, which include several ADUs directly against the western side of the alley.

By rejecting these exemption requests, the building will be scaled back to something more reasonable, keeping with the nature of the neighborhood and not further strain the already challenging traffic and parking in our neighborhood.

Furthermore, the applicant states that they are not subject to the 25 foot transitional height limit since the project is more than 49 feet from any properties zoned R1, yet Google Maps appears to show that the R1 zoned property at 7111 Oakwood Avenue is within 49 feet of the proposed development.

Also, since the alley behind the subject property is used extensively throughout the day (and parts of the night) for the residences and businesses, there must be provisions to maintain unimpeded access during construction. Noise mitigation requirements should also be included for the project during construction and for the eastern wall of the project and the eastern portion of the rooftop deck so as not to unnecessarily disturb the residents of the ADUs on the western side of the alley.

Thank you,

Kenneth Weinberg

1/23/25, 7:48 AM

City of Los Angeles Mail - Opposition to exemptions requested for 361 N. La Brea Avenue, CPC-2024-5977-DB-VHCA

356 N. Detroit Street



Bryant Wu <bryant.wu@lacity.org>

Case number cpc-2024-5977-db-vhca

1 message

miriam moskovits <miriammoskovits@gmail.com>
To: bryant.wu@lacity.org

Tue, Jan 14, 2025 at 11:21 PM

Case number cpc-2024-5977-db-vhca

Good morning as related to the property that is planning to be built on the corner of La Brea and Oakwood Avenue.

We are neighbors that live the block behind this property and as is our area never has parking and is always congested and extremely crowded already by a lot of people and houses and cars and pedestrians.

Building this massive structure will hinder our neighborhood it will bring more crime into the area it will bring more people into the area that is not good for the safety of our children and our families.

in addition it is a huge structure that does not have adequate parking for all of the residents of the apartment building which means that all us residents who currently live here will never have any parking on our blocks.

In addition a building height of 75 ft is way over what is currently allowed in our area and I'm not sure why they would allow a higher building than 45 ft.

In addition I'm not a development of 40 units brings with it a lot of people that are neighborhood cannot handle it is a small quiet area that will be hampered by so many more residents.

Please do not ruin our neighborhood by allowing the building of these apartment buildings that should be built in areas that can handle such a huge apartment building.

Thank you,

Miriam moskovits



Bryant Wu <bryant.wu@lacity.org>

Case #CPC-2024-5977-DB-VHCA and ENV-2024-5978-CE1 message

Naftali Alt <naftalialt@gmail.com>
To: bryant.wu@lacity.org

Fri, Jan 17, 2025 at 12:56 PM

Good afternoon.

I am writing you today about the plans to build an apartment complex at [361 North La Brea Ave. Los Angeles, CA 90036](#)

We are neighbors that live in the block behind this property, and as is, our area doesn't have enough parking and is congested & crowded already by a lot of people, pedestrians, cars and houses.

Building this massive structure will hinder our neighborhood. It will bring more crime in to the area, which is obviously NOT GOOD for the safety & welfare of our children and families.

In addition, it is a huge structure that DOES NOT have adequate or ample parking for its residents and/or customers. This in turn, will affect the residents in this area, as it pertains to parking on the block.

In addition a building height of 75 feet plus is way over what is currently allowed in our area. I'm not sure why they would allow a building higher than 35 feet (which is what is currently allowed).

Also, a development of 40 units, brings in a lot of people that our neighborhood CANNOT HANDLE!

Please do not ruin our neighborhood by allowing the building of these apartment buildings.

Thank you in advance for your understanding.

Naftali Alt



Bryant Wu <bryant.wu@lacity.org>

361 N La Brea Project

1 message

rgbess@gmail.com <rgbess@gmail.com>
To: Bryant.Wu@lacity.org

Wed, Jan 22, 2025 at 12:28 PM

Dear Mr Wu,

I live ½ a block from the site, at [438 N Detroit St](#). I am well aware of the congestion on that corner and La Brea itself.

I am writing to oppose the exemptions requested for the proposed new development at [361 N. La Brea Avenue, Los Angeles](#). Case Number: CPC-2024-5977-DB-VHCA, Environmental Case Number: ENV-2024-5978-CE.

The project as designed will add 40 new units and retail space on a commercial street that runs through a residential neighborhood consisting of primarily owner-occupied single family homes and duplexes. This magnitude of this structure is far greater than any other buildings nearby, and will change the character of our neighborhood.

It also sets a bad precedent for other developers who realize that by utilizing loopholes in various regulations, they can circumvent the protections designed to provide affordable housing. For example, the applicant claims they are setting aside 5 units for very low income households, they also point out that this building will not be subject to the Rent Stabilization Ordinance (RSO), so they are free to raise rents to market levels after the first year.

Traffic in this area is extremely busy including the streets in direct proximity to the proposed project. The residential streets such as Oakwood Avenue, are often full for blocks by people avoiding the major streets (e.g., Beverly Blvd).

Parking is already scarce and exceeds 85% of legal on-street parking occupied as certified by the city's parking study to establish Preferential Parking District (PPD) 47. Allowing the extra units that are requested through these exemptions puts additional strains on the traffic and parking, in excess of those allowed by AB 2097.

By rejecting these exemption request, the building will be scaled back to something more reasonable, keeping with the nature of the neighborhood and not further strain the already challenging traffic and parking in our neighborhood.

Rabbi Gershon Bess

[438 N Detroit St](#)

[LA , Ca 90036](#)



Bryant Wu <bryant.wu@lacity.org>

Case CPC-2024-5977-DB-VHCA

Yossie Weinberg <yossieweinberg@gmail.com>

Mon, Jan 6, 2025 at 10:22 AM

To: Bryant Wu <bryant.wu@lacity.org>

Thanks you so much for your responses,

I had a few follow up questions regarding this project,

I have a hard believing that La Brea and Beverly qualifies as a major transit stop since but I will follow up with the contact info attached to AB 2097 regarding that,

- 1) in regards to parking since the residents will presumably either have either an Oakwood or La Brea address they would be ineligible to obtain "47" parking permits which is the code for the permits on Detroit Street and the surrounding residential streets?
- 2) Is there a way to tighten up the existing parking restrictions on Detroit Street to make them permit parking only whereas now there is 2 hour parking most of the day which is not strictly enforced? this would help negate the ability for those using the commercial space from parking on the block
- 3) are there any specific plans as to what will occupy the commercial space or are there any restrictions as to what can occupy that space? for example a grocery store would have significantly more people in and at during the day than an office space
- 4) in regards to the upcoming hearing on January 23rd is your email the contact for letters opposing the project? and would there be a way to get the hearing information notice and zoom info in a clickable form if possible.

Thanks,

Yosef Weinberg

On Tue, Dec 31, 2024 at 12:42 PM Bryant Wu <bryant.wu@lacity.org> wrote:

Good afternoon Yossie,

Thank you for your email.

- 1) The project is located in an AB2097 area. AB 2097 is state law that prohibits cities from imposing parking requirements for projects within a half mile of a major transit stop.
- 2) There are regulatory compliance measures set forth from other departments within Los Angeles. I believe the Department of Building and Safety has RCMs to address these issues.
- 3) Projects that provide a certain percentage of units as affordable housing are permitted a density bonus. As this site is zoned C2-1VL and the project is providing a certain amount of affordable units, the project is allowed 40 units by right.
- 4) The property owner and signer information is vetted by the counter planners at the time of case acceptance. Oftentimes, the signer is a managing officer of the corporation. I'll need some time to double check.
- 5) Please see the attached application and findings that may help you understand the project a little better.

Thanks and have a happy new year!

Best,



Bryant Wu

Preferred Pronouns: He, His, Him

City Planning Associate

Los Angeles City Planning

200 N. Spring St Room 621

Los Angeles, CA. 90012

Planning4LA.org

Desk: (213) 202-5435



On Thu, Dec 26, 2024 at 8:45 PM Yossie Weinberg <yossieweinberg@gmail.com> wrote:

Hi,

I live on the 300 N. block of Detroit and I am looking for some additional information regarding the proposed project at [361 N. La Brea](#).

- 1) Why at least as far as I can see that there is no mention of a waiver regarding parking? the plan is for 40 apartments and a commercial space which would seem to mean you would need more than 40 spots yet the proposal calls for 16, additionally there already is parking shortage on the surrounding streets
- 2) What mitigation efforts are being implemented during construction to alleviate specifically regarding Oakwood Ave. and the alley between La Brea and Detroit which is already a challenge for 2 cars to pass through, specifically during rush hours when it gets very crowded and to allow emergency vehicles to safely pass through. Additionally a project like this will presumably require a large crew where they will be parking throughout the construction? the alley is important as because the residential garages are all on the alley side
- 3) Similar to point 2, what mitigation efforts will be implemented once the project is complete to alleviate 40 additional apartments?
- 4) Who owns this property? The applicant name says Samuel Einhorn yet my online research seems to show that the property seems to be registered to an LLC entitled 361 North La Brea, LLC and the incorporation documents seem to show no one by that name. It is possible the documents have not been updated online so if you could please confirm this.
- 5) Please produce any filings, waivers, exemptions and all documents etc. related to this project.

Thanks,
Yosef Weinberg

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

Subject: Formal Challenge to Applicant Standing for the Proposed Development at 361 N. La Brea Ave
(Case No CPC-2024-5977-DB-VHCA)

Dear Members of the Los Angeles Department of City Planning,

I am writing to challenge the standing of Mr. Samuel Einhorn to file the application for the proposed development at 361 N. La Brea Ave on behalf of 361 North La Brea, LLC. After reviewing the relevant application documents and LLC filings that I was able to obtain, it appears based on those documents that Mr. Einhorn lacks the legal authority or standing to act on behalf of 361 North La Brea, LLC. Below, I outline the specific reasons for this challenge:

1. Lack of Official Role Within the LLC

The LLC filings on record with the California Secretary of State do not list Mr. Einhorn as a manager, member, or agent of 361 North La Brea, LLC. Instead, the filings identify Barry Weiss and Samantha Feld as managers or agents. If Mr. Einhorn holds no formal position within the LLC, he cannot act on behalf of the LLC without explicit and documented authorization in accordance with the filing documents' clear outline. Additionally, the incorporation documents specify that one manager is designated as the sole person in charge of the LLC (Management Structure "The LLC will be managed by One Manager"), raising questions about whether Mr. Einhorn's involvement is legitimate or authorized.

2. No Evidence of Ownership Interest

The application does not include any documentation demonstrating that Mr. Einhorn has a direct ownership interest in 361 North La Brea, LLC or the property itself. Without such evidence, his standing as an applicant is further undermined.

3. Absence of Authorization from 361 North La Brea, LLC

The City Planning Application explicitly states that applicants who are not property owners must submit a Letter of Authorization (LOA) signed by an authorized representative of the property owner entity. No such authorization has been provided by 361 North La Brea, LLC, empowering Mr. Einhorn to file this application on its behalf. Without this document, Mr. Einhorn's representation of the LLC cannot be considered valid.

4. Lack of Response from City Planning Staff

On December 26, 2024, at 8:45 PM, I sent an email to Bryant Wu, City Planning Associate and the assigned staff contact for Case CPC-2024-5977-DB-VHCA, asking the following question:

"Who owns this property? The applicant's name says Samuel Einhorn yet my online research seems to show that the property seems to be registered to an LLC entitled 361 North La Brea, LLC and the incorporation documents seem to show no one by that name. It is possible the documents have not been updated online so if you could please confirm this."

On December 31, 2024, at 12:42 PM, Mr. Wu replied:

"The property owner and signer information is vetted by the counter planners at the time of case acceptance. Oftentimes, the signer is a managing officer of the corporation. I'll need some time to double check."

No further information or confirmation regarding the property's ownership or Mr. Einhorn's role was provided. Additionally, I requested, "Please produce any filings, waivers, exemptions, and all documents etc. related to this project." Despite this request, no documents clarifying the property's ownership or the applicant's standing were shared.

Request for Investigation and Action

Given the above points, I respectfully request the following actions:

1. The Department of City Planning should investigate the legitimacy of Mr. Einhorn's authority to file this application on behalf of 361 North La Brea, LLC.
2. If Mr. Einhorn is found to lack standing, the application should be deemed invalid and require a new filing with proper authorization.
3. A requirement should be made for 361 North La Brea, LLC to submit clear documentation of its organizational structure, purpose, and authorization processes to verify its compliance with city planning requirements.

Attachments

To support this challenge, I am attaching the following documents:

1. The City Planning Application for the proposed development at 361 N. La Brea Ave.
2. The incorporation documents for 361 North La Brea, LLC, demonstrating the designated managers and their roles.

Thank you for your attention to this matter.

Sincerely,

Yosef Weinberg



202250814277



STATE OF CALIFORNIA
Office of the Secretary of State
ARTICLES OF ORGANIZATION
CA LIMITED LIABILITY COMPANY

California Secretary of State
1500 11th Street
Sacramento, California 95814
(916) 653-3516

For Office Use Only

-FILED-

File No.: 202250814277

Date Filed: 5/19/2022

B0752-3427 05/19/2022 2:21 PM Received by California Secretary of State

Limited Liability Company Name	
Limited Liability Company Name	361 NORTH LA BREA, LLC
Initial Street Address of Principal Office of LLC	
Principal Address	11627 TELEGRAPH ROAD SUITE 200 SANTA FE SPRINGS, CA 90670
Initial Mailing Address of LLC	
Mailing Address	11627 TELEGRAPH ROAD SUITE 200 SANTA FE SPRINGS, CA 90670
Attention	Samantha Feld
Agent for Service of Process	
Agent Name	Samantha Feld
Agent Address	11627 TELEGRAPH ROAD SUITE 200 SANTA FE SPRINGS, CA 90670
Purpose Statement	The purpose of the limited liability company is to engage in any lawful act or activity for which a limited liability company may be organized under the California Revised Uniform Limited Liability Company Act.
Management Structure	
The LLC will be managed by	One Manager
Additional information and signatures set forth on attached pages, if any, are incorporated herein by reference and made part of this filing.	
Electronic Signature	
<input checked="" type="checkbox"/> By signing, I affirm under penalty of perjury that the information herein is true and correct and that I am authorized by California law to sign.	
<i>Samantha K. Feld</i>	<i>05/19/2022</i>
Organizer Signature	Date



BA20220337771



STATE OF CALIFORNIA
Office of the Secretary of State
STATEMENT OF INFORMATION
LIMITED LIABILITY COMPANY

California Secretary of State
1500 11th Street
Sacramento, California 95814
(916) 653-3516

For Office Use Only

-FILED-

File No.: BA20220337771

Date Filed: 6/7/2022

B0805-4735 06/07/2022 3:26 PM Received by California Secretary of State

Entity Details	
Limited Liability Company Name	361 NORTH LA BREA, LLC
Entity No.	202250814277
Formed In	CALIFORNIA
Street Address of Principal Office of LLC	
Principal Address	11627 TELEGRAPH ROAD SUITE 200 SANTA FE SPRINGS, CA 90670
Mailing Address of LLC	
Mailing Address	11627 TELEGRAPH ROAD SUITE 200 SANTA FE SPRINGS, CA 90670
Attention	Samantha Feld
Street Address of California Office of LLC	
Street Address of California Office	None
Manager(s) or Member(s)	
Manager or Member Name	Manager or Member Address
+ BARRY WEISS	11627 TELEGRAPH ROAD 200 SANTA FE SPRINGS, CA 90670
Agent for Service of Process	
Agent Name	Samantha Feld
Agent Address	11627 TELEGRAPH ROAD SUITE 200 SANTA FE SPRINGS, CA 90670
Type of Business	
Type of Business	COLLEGE HEALTH
Email Notifications	
Opt-in Email Notifications	Yes, I opt-in to receive entity notifications via email.
Chief Executive Officer (CEO)	
CEO Name	CEO Address
None Entered	
Labor Judgment	
No Manager or Member of this Limited Liability Company has an outstanding final judgment issued by the Division of Labor Standards Enforcement or a court of law, for which no appeal therefrom is pending, for the violation of any wage order or provision of the Labor Code.	

Electronic Signature

☒ By signing, I affirm under penalty of perjury that the information herein is true and correct and that I am authorized by California law to sign.

ILIANA ANGULO

Signature

06/07/2022

Date



BA20241079553



STATE OF CALIFORNIA
Office of the Secretary of State
STATEMENT OF INFORMATION
LIMITED LIABILITY COMPANY

California Secretary of State
1500 11th Street
Sacramento, California 95814
(916) 657-5448

For Office Use Only

-FILED-

File No.: BA20241079553

Date Filed: 6/4/2024

B2789-3694 06/04/2024 12:26 PM Received by California Secretary of State

Entity Details	
Limited Liability Company Name	361 NORTH LA BREA, LLC
Entity No.	202250814277
Formed In	CALIFORNIA
Street Address of Principal Office of LLC	
Principal Address	11627 TELEGRAPH ROAD SUITE 200 SANTA FE SPRINGS, CA 90670
Mailing Address of LLC	
Mailing Address	11627 TELEGRAPH ROAD SUITE 200 SANTA FE SPRINGS, CA 90670
Attention	Samantha Feld
Street Address of California Office of LLC	
Street Address of California Office	None
Manager(s) or Member(s)	
Manager or Member Name	Manager or Member Address
BARRY WEISS	11627 TELEGRAPH ROAD 200 SANTA FE SPRINGS, CA 90670
Agent for Service of Process	
Agent Name	PATRICE KOCH
Agent Address	11627 TELEGRAPH ROAD SUITE 200 SANTA FE SPRINGS, CA 90670
Type of Business	
Type of Business	COLLEGE HEALTH
Email Notifications	
Opt-in Email Notifications	No, I do NOT want to receive entity notifications via email. I prefer notifications by USPS mail.
Chief Executive Officer (CEO)	
CEO Name	CEO Address
None Entered	
Labor Judgment	
No Manager or Member, as further defined by California Corporations Code section 17702.09(a)(8), has an outstanding final judgment issued by the Division of Labor Standards Enforcement or a court of law, for which no appeal is pending, for the violation of any wage order or provision of the Labor Code.	

Electronic Signature

☒ By signing, I affirm under penalty of perjury that the information herein is true and correct and that I am authorized by California law to sign.

MARISSA CHAVEZ

Signature

06/04/2024

Date



CITY PLANNING APPLICATION

THIS BOX FOR CITY PLANNING STAFF USE ONLY

☐ ED1 Eligible ☐ AB 2097 Eligible

Case Number: _____

Env. Case Number: _____

Application Type: _____

Case Filed With (Print Name): _____ Date Filed: _____

Application includes letter requesting:

☐ Waived Hearing ☐ Concurrent hearing ☐ Hearing not to be scheduled on a specific date (e.g. vacation hold)

Related Case Number(s): _____

THIS SECTION TO BE COMPLETED BY THE APPLICANT

Provide all information requested. Missing, incomplete or inconsistent information will cause delays.

All terms in this document are applicable to the singular as well as the plural forms of such terms.

Refer to the City Planning Application Filing Instructions ([CP13-7810](#)) for more information.

1. PROJECT LOCATION

Street Address¹: 361 N La Brea Ave, Los Angeles, CA 90036 Unit/Space Number: _____Legal Description² (Lot, Block, Tract): Lots 1 and 2 of Tract 4924

Assessor Parcel Number: 5525-033-001 Total Lot Area: 10,393

2. PROJECT DESCRIPTION

Present Use: One-story commercial building.

Proposed Use: A new 6-story, 75' high, 40-unit mixed-use building with 5 units set aside as Very Low-Income units with parking provided on the ground floor.

Project Name (if applicable): _____

¹ Street Addresses must include all addresses on the subject/application site (as identified in ZIMAS—<http://zimas.lacity.org>).

² Legal Description must include all contiguously owned properties (even if they are not a part of the proposed project site).

Describe in detail the characteristics, scope and/or operation of the proposed project:

A new 6-story, 75' high, 40-unit mixed-use building with 5 units set aside as Very Low-Income units with parking provided on the ground floor.

Additional Information Attached:

☐ YES ☒ NO

EXISTING SITE CONDITIONS

Complete and check all that apply:

- | | |
|---|---|
| <input type="checkbox"/> Site is undeveloped or unimproved (i.e., vacant) | <input type="checkbox"/> Site is located within 500 feet of a freeway or railroad |
| <input checked="" type="checkbox"/> Site has existing buildings (provide copies of building permits) | <input type="checkbox"/> Site is located within 500 feet of a sensitive use (e.g., school, park) |
| <input type="checkbox"/> Site is/was developed with uses that could release hazardous materials on soil and/or groundwater (e.g., dry cleaning, gas station, auto repair, industrial) | <input type="checkbox"/> Site has special designation (e.g., National Historic Register, Survey LA) |

PROPOSED PROJECT INFORMATION

Check all that apply or could apply:

- | | |
|---|---|
| <input checked="" type="checkbox"/> Demolition of existing buildings/structures | <input checked="" type="checkbox"/> New construction: <u>40,505</u> square feet |
| <input type="checkbox"/> Relocation of existing buildings/structures | <input type="checkbox"/> Additions to existing buildings |
| <input type="checkbox"/> Removal of any on-site tree | <input type="checkbox"/> Interior tenant improvement |
| <input type="checkbox"/> Removal of any street tree | <input type="checkbox"/> Exterior renovation or alteration |
| <input type="checkbox"/> Removal of protected trees onsite/in public right-of-way | <input type="checkbox"/> Change of use and/or hours of operation |
| <input checked="" type="checkbox"/> Grading | <input type="checkbox"/> Uses or structures in public right-of-way |
| <input type="checkbox"/> Haul Route | <input type="checkbox"/> Phased project |

HOUSING COMPONENT INFORMATION

Number of Residential Units:	Existing	<u>0</u>	- Demolish(ed) ³	<u>0</u>	+ Adding	<u>40</u>	= Total	<u>40</u>
Number of Affordable Units ⁴ :	Existing	<u>0</u>	- Demolish(ed)	<u>0</u>	+ Adding	<u>5</u>	= Total	<u>5</u>
Number of Market Rate Units:	Existing	<u>0</u>	- Demolish(ed)	<u>0</u>	+ Adding	<u>35</u>	= Total	<u>35</u>
Mixed Use Projects, Amount of <u>Non-Residential</u> Floor Area: <u>2,143</u> square feet								

³ Number of units to be demolished and/or which have been demolished within the last five years.

⁴ As determined by the Los Angeles Housing Department.

PARKING INFORMATION

Is the project utilizing AB 2097?

☒ YES

☐ NO

If Yes, provide a date-stamped ZIMAS Parcel Profile Report including AB 2097 Eligibility information.

Provided # of Parking Spaces: 16 Required # of Parking Spaces: 0

Parking Minimum Checklist

The following checklist will determine if parking minimums can be imposed on a Project under AB 2097. Parking minimums cannot be imposed if the proposed project meets any of the following criteria.

Check all that apply:

- ☐ Include a minimum of 20 percent of the total dwelling units for Very Low, Low, or Moderate-Income households, students, the elderly, or persons with disabilities
- ☐ Contain fewer than 20 dwelling units
- ☒ Are subject to parking reductions of any other applicable law (by satisfying the applicable eligibility requirements)

PUBLIC RIGHT-OF-WAY INFORMATION

Have you submitted the [Planning Case Referral Form](#) to BOE? (if required)

☒ YES

☐ NO

Is the project required to dedicate land to the public right-of-way?

☐ YES

☒ NO

If so, what is/are the dedication requirement(s)? 0 feet

If dedications are required on multiple streets, identify as such: _____

3. ACTION(S) REQUESTED

Provide the Los Angeles Municipal Code (LAMC) Section that authorizes the request and (if applicable) the LAMC Section or the Specific Plan/Overlay Section from which relief is sought, and follow with a description of the requested action.

Does the project include Multiple Approval Requests per LAMC Section 13A.2.10. of Chapter 1A?

☐ YES

☒ NO

Authorizing Code Section: _____

Code Section from which relief is requested (if any): _____

Action Requested: _____

SEE ATTACHED

Authorizing Code Section: _____

Code Section from which relief is requested (if any): _____

Action Requested: _____

Additional Requests Attached: _____

SEE ATTACHED

☒ **YES**

☐ **NO**

4. RELATED CITY PLANNING CASES

Are there previous or pending cases/decisions/environmental clearances on the project site?

☐ **YES**

☒ **NO**

If YES, list all case number(s): _____

If the application/project is directly related to one of the above cases, list the pertinent case numbers below and complete/check all that apply (provide copy).

Case No.: _____

Ordinance No.: _____

☐ Condition Compliance Review

☐ Clarification of Q (Qualified) Condition

☐ Modification of Conditions

☐ Clarification of D (Development) Limitation

☐ Revision of Approved Plans

☐ Amendment to T (Tentative) Classification

☐ Renewal of Entitlement

☐ Plan Approval subsequent to Main Conditional Use

For purposes of environmental (CEQA) analysis, is there intent to develop a larger project?

☐ **YES**

☒ **NO**

Have you filed, or is there intent to file, a Subdivision with this project?

☐ **YES**

☒ **NO**

If YES, to either of the above, describe the other parts of the projects or the larger project below, whether or not currently filed with the City:

5. RELATED DOCUMENTS / REFERRALS

To help assigned staff coordinate with other Departments that may have a role in the proposed project, provide a copy of any applicable form and reference number if known.

Are there any recorded Covenants, affidavits or easements on this property?

☒ **YES (provide copy)**

☐ **NO**

3. ACTION(S) REQUESTED

Provide the Los Angeles Municipal Code (LAMC) Section that authorizes the request and (if applicable) the LAMC Section or the Specific Plan/Overlay Section from which relief is sought; follow with a description of the requested action.

Does the project include Multiple Approval Requests per LAMC 12.36?

☐ Yes

☒ No

1. **Authorizing Code Section:** 12.22.A.25.(g)(3)

Section from which relief is requested (if any): 12.21.1

Action Requested: Off-Menu Incentive to allow FAR at 3.91:1 in lieu of the 1.5:1 limit.

2. **Authorizing Code Section:** 12.22.A.25.(g)(3)

Section from which relief is requested (if any): 12.21.1

Action Requested: Off-Menu Incentive to allow height at 75' / 6-stories in lieu of the
45' / 3-story limit per the 1VL height district.

3. **Authorizing Code Section:** 12.22.A.25.(g)(3)

Section from which relief is requested (if any): 12.21.1.A.10.

Action Requested: Off-Menu Incentive to allow relief from the 33' transitional height limit for
the portion of the site that is within 99' of R1.

4. **Authorizing Code Section:** 12.22.A.25.(g)(3)

Section from which relief is requested (if any): 12.14.C.2.

Action Requested: Off-Menu Incentive to allow the southerly side yard setback at 5' in lieu of
of the 9' required.

6. PROJECT TEAM INFORMATION (COMPLETE ALL APPLICABLE FIELDS)

APPLICANT

Applicant⁵ Name: Samuel Einhorn
Company/Firm: 361 North La Brea LLC
Address: 11627 Telegraph Road Unit/Space Number: Suite 200
City: Santa Fe Springs State: CA Zip Code: 90670
Telephone: 323.301.9115 E-mail: seinhnrn@yahoo.com

Are you in escrow to purchase the subject property?: ☐ YES ☐ NO

PROPERTY OWNER OF RECORD

☒ Same as applicant ☐ Different from applicant

Name (if different from applicant): _____
Address: _____ Unit/Space Number: _____
City: _____ State: _____ Zip Code: _____
Telephone: _____ E-mail: _____

AGENT / REPRESENTATIVE NAME: Daniel Ahadian

Company/Firm: nur - DEVELOPMENT | CONSULTING
Address: 864 S Robertson Blvd Unit/Space Number: 3rd Fl
City: Los Angeles State: CA Zip Code: 90035
Telephone: 310.339.7344 E-mail: daniel@nurdevelopment.com

⁵ An applicant is a person with a lasting interest in the completed project such as the property owner or a lessee/user of a project.
An agent/representative is someone filing an application on behalf of a client.

OTHER (E.G. ARCHITECT, ENGINEER, CEQA CONSULTANT): Architect

Name: Edward Xavier Carlson

Company/Firm: _____

Address: 710 E Verdugo Ave **Unit/Space Number:** _____

City: Burbank **State:** CA **Zip Code:** 91501

Telephone: lt 303-520-8192 **E-mail:** edcarlson43@msn.com

Primary Contact for Project Information⁶

(Select only one. Email address and phone number required.)

☐ Owner ☐ Applicant ☒ Agent/Representative ☐ Other: _____

To ensure notification of any public hearing as well as decisions on the project, make sure to include an individual mailing label for each member of the project team in both the Property Owners List and the Abutting Property Owners List.

⁶ As of June 8, 2022, the Primary Contact for Project is required to have an Angeleno Account and register with the Ethics Commission for Significant Project Entitlements, as defined in LAMC Section [49.7.37\(A\)\(6\)](#). An email address and phone number shall be required on the DCP Application Form, and the email address provided shall match the email address used to create the Angeleno Account.

PROPERTY OWNER AFFIDAVIT

Before the application can be accepted, the owner of each property involved must provide a notarized signature to verify the application is being filed with their knowledge. Staff will confirm ownership based on the records of the City Engineer or County Assessor. In the case of partnerships, corporations, LLCs or trusts an officer of the ownership entity so authorized may sign as stipulated below.

- **Ownership Disclosure.** If the property is owned by a partnership, corporation, LLC or trust, a disclosure identifying an officer of the ownership entity must be submitted. The disclosure must list the names and addresses of the principal owners (25% interest or greater). The signatory must appear in this list of names. A letter of authorization, as described below, may be submitted provided the signatory of the letter is included in the Ownership Disclosure. Include a copy of the current partnership agreement, corporate articles, or trust document as applicable.
- **Letter of Authorization (LOA).** An LOA from a property owner granting someone else permission to sign the application form may be provided if the property is owned by a partnership, corporation, LLC or trust or in rare circumstances when an individual property owner is unable to sign the application form. To be considered for acceptance, the LOA must indicate the name of the person being authorized the file, their relationship to the owner or project, the site address, a general description of the type of application being filed and must also include the language in items A-D below. In the case of partnerships, corporations, LLCs or trusts the LOA must be signed and notarized by the authorized signatory as shown on the Ownership Disclosure or in the case of private ownership by the property owner. Proof of Ownership for the signatory of the LOA must be submitted with said letter.
- **Grant Deed.** Provide a Copy of the Grant Deed If the ownership of the property does not match City Records and/or if the application is for a Coastal Development Permit. The Deed must correspond exactly with the ownership listed on the application.
- **Multiple Owners.** If the property is owned by more than one individual (e.g. John and Jane Doe or Mary Smith and Mark Jones) notarized signatures are required of all owners.
 - a. I hereby certify that I am the owner of record of the herein previously described property located in the City of Los Angeles which is involved in this application or have been empowered to sign as the owner on behalf of a partnership, corporation, LLC or trust as evidenced by the documents attached hereto.
 - b. I hereby consent to the filing of this application on my property for processing by the Department of City Planning.
 - c. I understand if the application is approved, as a part of the process the City will apply conditions of approval which may be my responsibility to satisfy including, but not limited to, recording the decision and all conditions in the County Deed Records for the property.
 - d. By my signature below, I declare under penalty of perjury under the laws of the State of California that the foregoing statements are true and correct.

*Property Owner's signatures must be signed/notarized in the presence of a Notary Public.
The City requires an original signature from the property owner with the "wet" notary stamp.
A Notary Acknowledgement is available for your convenience on following page.*

Signature: Samuel Einhorn

Date: 07/16/24

Print Name: SAMUEL EINHORN

Signature: _____

Date: _____

Print Name: _____

SPACE BELOW FOR NOTARY'S USE

CALIFORNIA ALL-PURPOSE ACKNOWLEDGEMENT

CIVIL CODE '1189

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document, to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of LOS ANGELES

On 9/16/24 before me, RALPH M. HARTMAN, NOTARY PUBLIC
(Insert Name of Notary Public and Title)

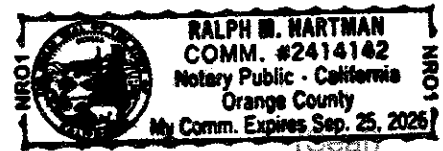
personally appeared SAMUEL GILHORN, who
proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are
subscribed to the within instrument and acknowledged to me that he/~~she~~/they executed the same
in his/~~her~~/their authorized capacity(ies), and that by his/~~her~~/their signature(s) on the instrument the
person(s), or the entity upon behalf on which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Ralph M. Hartman

Signature



APPLICANT DECLARATION

A separate signature from the applicant, whether they are the property owner or not, attesting to the following, is required before the application can be accepted.

- a. I hereby certify that the information provided in this application, including plans and other attachments, is accurate and correct to the best of my knowledge. Furthermore, should the stated information be found false or insufficient to fulfill the requirements of the Department of City Planning, I agree to revise the information as appropriate.
- b. I hereby certify that I have fully informed the City of the nature of the project for purposes of the California Environmental Quality Act (CEQA) and have not submitted this application with the intention of segmenting a larger project in violation of CEQA. I understand that should the City determine that the project is part of a larger project for purposes of CEQA, the City may revoke any approvals and/or stay any subsequent entitlements or permits (including certificates of occupancy) until a full and complete CEQA analysis is reviewed and appropriate CEQA clearance is adopted or certified.
- c. I understand that the environmental review associated with this application is preliminary, and that after further evaluation, additional reports, studies, applications and/or fees may be required.
- d. I understand and agree that any report, study, map or other information submitted to the City in furtherance of this application will be treated by the City as public records which may be reviewed by any person and if requested, that a copy will be provided by the City to any person upon the payment of its direct costs of duplication.
- e. I understand that the burden of proof to substantiate the request is the responsibility of the applicant. Additionally, I understand that planning staff are not permitted to assist the applicant or opponents of the project in preparing arguments for or against a request.
- f. I understand that there is no guarantee, expressed or implied, that any permit or application will be granted. I understand that each matter must be carefully evaluated and that the resulting recommendation or decision may be contrary to a position taken or implied in any preliminary discussions.
- g. I understand that if this application is denied, there is no refund of fees paid.
- h. I understand and agree to defend, indemnify, and hold harmless, the City, its officers, agents, employees, and volunteers (collectively "City"), from any and all legal actions, claims, or proceedings (including administrative or alternative dispute resolution (collectively "actions")), arising out of any City process or approval prompted by this Action, either in whole or in part. Such actions include but are not limited to: actions to attack, set aside, void, or otherwise modify, an entitlement approval, environmental review, or subsequent permit decision; actions for personal or property damage; actions based on an allegation of an unlawful pattern and practice; inverse condemnation actions; and civil rights or an action based on the protected status of the petitioner or claimant under state or federal law (e.g. ADA or Unruh Act). I understand and agree to reimburse the City for any and all costs incurred in defense of such actions. This includes, but is not limited to, the payment of all court costs and attorneys' fees, all judgments or awards, damages, and settlement costs. The indemnity language in this

paragraph is intended to be interpreted to the broadest extent permitted by law and shall be in addition to any other indemnification language agreed to by the applicant.

- i. I understand that the City is protected by numerous statutory immunities from liability for damages that may be caused by its land use regulatory actions, as set forth in Government Code, section 818, et seq. For instance, the City cannot be held liable for personal or property injuries or damages allegedly caused by its approval and issuance of any discretionary permit, entitlement or approval (Gov. Code § 818.4), or its failure to inspect or its negligence in inspecting a property for the purpose of determining whether the property complies with or violates any permit, entitlement or approval or contains or constitutes a hazard to health or safety (Gov. Code § 818.6).
- j. By my signature below, I declare under penalty of perjury, under the laws of the State of California, that all statements contained in this application and any accompanying documents are true and correct, with full knowledge that all statements made in this application are subject to investigation and that any false or dishonest answer to any question may be grounds for denial or subsequent revocation of license or permit.

The City requires an original signature from the applicant. The applicant's signature below does not need to be notarized.

Signature: _____

Date: _____

Print Name: _____

NEIGHBORHOOD CONTACT SHEET (OPTIONAL)

7. SIGNATURES

Signatures of adjoining or neighboring property owners in support of the request are not required but are helpful, especially for projects in single-family residential areas. Signatures may be provided below (attach additional sheets if necessary).

NAME (Print)	SIGNATURE	ADDRESS	KEY # ON MAP

REVIEW of the project by the applicable Neighborhood Council is not required but is helpful. If applicable, describe, below or separately, any contact you have had with the Neighborhood Council or other community groups, business associations and/or officials in the area surrounding the project site (attach additional sheets if necessary).

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

Subject: Comprehensive Opposition to Waivers Requested for the Proposed Development at 361 N. La Brea Ave (Case No. CPC-2024-5977-DB-VHCA)

Dear Members of the Los Angeles Department of City Planning,

I am writing to formally oppose the waivers requested for the proposed development at 361 N. La Brea Ave. While I recognize the importance of addressing housing shortages and promoting transit-oriented development, the requested waivers raise substantial concerns regarding compliance with zoning laws, environmental impacts, and the well-being of the community.

Key Issues

1. CEQA Exemptions and Environmental Concerns

The applicant's request for a CEQA Class 32 exemption under Section 15332 is unwarranted due to the following:

- **Cumulative Impacts:** Increased traffic, parking strain, and noise from 40 residential units and commercial space will exacerbate congestion on Oakwood Avenue and nearby streets, violating CEQA Guidelines Section 15300.2(b).
- **Significant Environmental Effects:** The development will significantly increase vehicular circulation, greenhouse gas emissions, and noise pollution, especially from rooftop terraces, violating Section 15300.2(c).
- **Unusual Circumstances:** The six-story height and FAR of 3.91:1 are grossly disproportionate to the surrounding low-density residential neighborhood, qualifying as unusual circumstances under Section 15300.2(a).
- **Lack of Environmental Studies:** The applicant has not provided required studies to substantiate their claim of no significant environmental impacts.

The CEQA Guidelines clearly state that exemptions cannot be granted when exceptions under Section 15300.2 apply. Given the substantial evidence of environmental impacts and the lack of supporting studies, this project fails to qualify for a Class 32 exemption. Denying the exemption aligns with CEQA's purpose of protecting communities from developments with significant environmental and cumulative impacts.

2. Parking Waivers and Permit Parking Concerns

The project relies on AB 2097 to waive parking requirements, providing only 16 spaces for 40 residential units and 2,143 square feet of retail space. This is inadequate and creates significant issues:

- **Impact on Permit Parking District (PPD) 47:** The site is within PPD 47 but not on a street with restricted parking. If residents of the development are ineligible for PPD permits, they will rely heavily on nearby unrestricted streets like Oakwood Avenue, which are already oversaturated. If they are eligible, the influx of new residents will further strain the existing PPD system, disadvantaging current residents. Additionally, while the floors that no waivers are required for (first 3 floors) may be covered under AB 2097 that exemption should not apply to the units and floors where other variances are being requested.
- **Unrealistic Bicycle Parking Provisions:** The requirement for 43 bicycle spaces—to offset the lack of automobile parking—is impractical given the demographic and car-reliant nature of the area. It does not address the fundamental need for adequate parking.

Under AB 2097, the city has the authority to impose parking minimums if a project adversely impacts existing parking resources.

3. Violations of Transitional Height Rules

The project seeks to bypass the 33-foot transitional height limit for developments within 99 feet of R1 properties, as mandated by LAMC Section 12.21.1. Granting this waiver would:

- **Exacerbate Height Disparities:** The six-story structure would overshadow neighboring properties, creating a stark and intrusive contrast with the surrounding low-density residential zones.
- **Privacy Violations:** The rooftop terraces allow direct views into adjacent residential properties, significantly infringing on their privacy. These terraces, above the 75-foot height limit, would enable residents and visitors to overlook private yards and homes, further eroding the sense of security and peace for nearby residents.

Notably, the applicant seemingly has not provided any survey or measurement data to confirm the project's distance from R1 properties or demonstrate compliance with legal requirements. It also fails to include what percentage of the property the waivers for this would cover.

4. Excessive Height and FAR Variances

The proposed height of 83.5 feet (including elevator shafts) and Floor Area Ratio (FAR) of 3.91:1 far exceed the zoning limits of 45 feet and 1.5:1 for the C2-1VL zone. These variances:

- **Well and Above Max Variances Allowed:** The project asks for 75 feet in total height, yet the top of elevator shaft will be nearly 10 feet higher than the max allowance. Additionally, based on that it seems that the walls surrounding the rooftop terrace will also be over the 75-foot allowance.
- **Disrupt Neighborhood Character:** The structure's scale is inconsistent with the surrounding area of single-family homes and duplexes, permanently altering the community's character.

- **Set a Dangerous Precedent:** Approving such extreme variances would encourage other developers to exploit similar waivers, eroding zoning protections citywide.

5. Setback Reductions

Reducing the southern setback from 9 feet to 5 feet:

- Reduces open space, impacting light and air circulation for adjacent properties.
- Facilitates overdevelopment by likely adding additional units.

6. Retail Space Concerns

The lack of restrictions on the retail component raises concerns about disruptive uses:

- **Alcohol Sales:** Frequently approved without sufficient community oversight, potentially exacerbating noise and traffic issues.
- **Late-Night Operations:** Could introduce noise and traffic, further disturbing residents.

7. Inadequate Affordable Housing Contribution

The project reserves only 5 out of 40 units (12.5%) for very low-income households. Moreover:

- **Temporary Affordability:** The development will not be subject to the Rent Stabilization Ordinance (RSO) after the first year, allowing rents to rise to market levels. This undermines the project's claim of providing meaningful affordable housing.
- **Disproportionate Benefits to Developers:** The small percentage of affordable units does not justify the extensive waivers requested, which primarily benefit the developer at the expense of the community.

8. Construction Impacts

The project lacks clear plans to mitigate construction disruptions:

- **Alley Access:** The adjacent alley, heavily relied upon by residents and businesses, will face disruptions without a management plan.
- **Worker Parking and Noise:** Construction workers will likely park in residential areas, exacerbating parking shortages, while construction noise will disrupt daily life.

Recommendations and Restrictions

To mitigate these issues and ensure responsible development, I propose the following:

1. **Environmental Review:** Deny the CEQA exemption and require comprehensive environmental studies to evaluate traffic, noise, and cumulative impacts.
2. **Height and FAR Limits:** Enforce zoning limits on height (45 feet) and FAR (1.5:1) to preserve neighborhood character and ensure compliance with transitional height rules.

3. **Parking Requirements:** Impose minimum parking provisions for all units and restrict reliance on AB 2097 for floors requiring additional variances.
 4. **Retail Restrictions:** Prohibit alcohol sales, enforce noise mitigation measures, and restrict operating hours for retail spaces.
 5. **Construction Management:** Mandate plans to maintain alley access, control construction noise, and designate off-site parking for workers.
-

Conclusion

If I was a developer, I would likely seek similar waivers to maximize profits. While addressing housing needs is important, granting extensive waivers for this project prioritizes developer profits over the well-being of the community and long-term neighborhood stability. I urge the Department to reject the requested waivers and require the developer to propose a scaled-back project that aligns with existing zoning regulations, mitigates environmental and construction impacts, and incorporates meaningful community input.

Thank you,

Yosef Weinberg



Bryant Wu <bryant.wu@lacity.org>

Case CPC-2024-5977-DB-VHCA Opposition Statements

1 message

Yossie Weinberg <yossieweinberg@gmail.com>

Wed, Jan 22, 2025 at 10:28 PM

To: Bryant Wu <bryant.wu@lacity.org>

Thank you for your responsiveness in answering questions to the best of your ability and for providing all the documents you were able to obtain for me,

I hope to be present by the meeting tomorrow but just to be on the safe side and because the amount of info enclosed I figured I would provide written statements as well

These opposition statements are based on the facts available to me regarding this project as well as my interpretation of various statutes and codes, obviously if provided with additional information or studies that may or may not change my opinions

Yosef Weinberg

2 attachments



Case No CPC-2024-5977-DB-VHCA 361 N. La Brea LLC.pdf
1616K



Case No. CPC-2024-5977-DB-VHCA (361 North La Brea).pdf
69K

Exhibit F

Class 32 Categorical Exemption



CITY OF LOS ANGELES
DEPARTMENT OF CITY PLANNING
CITY HALL 200 NORTH SPRING STREET LOS ANGELES CA 90012

Categorical Exemption

361 N La Brea Ave
Case Number: ENV-2024-5978-CE

Project Information

Date	January 21, 2025
Project Location	361 N La Brea Avenue, Los Angeles CA 90036
Community Plan Area:	Wilshire
Council District:	5 – Katy Young Yaroslavsky
Related Case #	CPC-2024-5977-DB-VHCA
Lead Agency	City of Los Angeles, Los Angeles City Planning 200 N Spring Street, Los Angeles, CA 90012
Applicant	361 North La Brea LLC 11627 Telegraph Road, Suite 200, Santa Fe Springs, CA 90670
Prepared By	nur Corporation 864 S Robertson Blvd, 3 rd Floor, Los Angeles, CA 90035

CEQA Section 15332

Categorical Exemption Class 32 for In-Fill Development Projects

CEQA, or the California Environmental Quality Act, is a statute that requires state and local agencies to identify the significant environmental impacts of their actions and to avoid or mitigate those impacts, if feasible. Categorical Exemptions are descriptions of types of projects which the Secretary of the Resources Agency of the State of California has determined do not have a significant effect on the environment, and therefore are not subject to further environmental review under CEQA.

The Class 32 exemption (Section 15332 of the State CEQA Guidelines) is intended to promote infill development within urbanized areas. To qualify for the exemption, it must be demonstrated that the proposed project can meet the five prescribed findings. Below is a list of the five prescribed findings and how the proposed project complies with each of them.

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

The Los Angeles General Plan sets forth goals, objectives and programs that guide both Citywide and community specific land use policies. The General Plan is comprised of a range of State-mandated elements, including, Land Use, Transportation, Noise, Safety, Housing and Conservation. The City's Land Use Element is divided into 35 community plans that establish parameters for land use decisions within those sub-areas of the City.

The proposed project substantially conforms with the purpose, intent and provisions of the General Plan and Wilshire Community Plan. The General Plan, which includes the Housing Element and Land Use Element, encourages multi-family projects with affordable housing uses along transit corridors. As a result, the proposed project is desirable because it provides residential units on commercial zoned property that can support residential and commercial land uses that are nearby transit.

By proposing a high-quality, well-designed multi-family project with 40 residential units, 5 units of which will be affordable at the Very Low Income, in an area zoned for such a development, the proposed project meets various goals and objectives of the Housing Element 2021-2029.

The project is in compliance with the following Elements of the General Plan: Framework Element, Housing Element, Mobility Element and the Land Use Element Wilshire Community Plan.

Framework Element

The Citywide General Plan Framework Element is a guide for communities to implement growth and development policies by providing a comprehensive long-range view of the City as a whole. The Element establishes categories of land use that are broadly described by ranges of intensity/density, heights, and lists of typical uses. The definitions reflect a range of land use possibilities found in the City's already diverse urban, suburban, and rural land use patterns. The Citywide General Plan Framework text defines policies related

to growth and includes policies for land use, housing, urban form/neighborhood design, open space/conservation, economic development, transportation, and infrastructure/public services. The proposed project would be in conformance with the following goals of the Framework as described below.

Chapter 3: Land Use

Objective 3.1: Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.

Policy 3.1.4: Accommodate new development in accordance with land use and density provisions of the General Plan Framework Long-Range Land Use Diagram.

Objective 3.2: Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and air pollution.

Policy 3.2.2: Establish, through the Framework Long-Range Land Use Diagram, community plans, and other implementing tools, patterns and types of development that improve the integration of housing with commercial uses and the integration of public services and various densities of residential development within neighborhoods at appropriate locations.

Policy 3.2.3: Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.

Policy 3.2.4: Provide for the siting and design of new development that maintains the prevailing scale and character of the City's stable residential neighborhoods and enhance the character of commercial and industrial districts.

Objective 3.4: Encourage new multi-family residential, retail commercial, and office development in the City's neighborhood districts, community, regional, and downtown centers as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts.

Policy 3.4.1: Conserve existing stable residential neighborhoods and lower-intensity commercial districts and encourage the majority of new commercial and mixed-use (integrated commercial and residential) development to be located (a) in a network of neighborhood districts, community, regional, and downtown centers, (b) in proximity to rail and bus transit stations and corridors, and (c) along the City's major boulevards, referred to as districts, centers, and mixed-use boulevards, in accordance with the Framework Long-Range Land Use Diagram.

Objective 3.7: Provide for the stability and enhancement of multi-family residential neighborhoods and allow for growth in areas where there is sufficient public infrastructure and services and the residents' quality of life can be maintained or improved.

Policy 3.7.4: Improve the quality of new multifamily dwelling units based on the standards in Chapter 5 Urban Form and Neighborhood Design Chapter of this Element.

Objective 3.9: Reinforce existing and encourage new community centers, which accommodate a broad range of uses that serve the needs of adjacent residents, promote neighborhood and community activity, are compatible with adjacent neighborhoods, and are developed to be desirable places in which to live, work and visit, both in daytime and nighttime.

Objective 3.15: Focus mixed commercial/residential uses, neighborhood-oriented retail, employment opportunities, and civic and quasi-public uses around urban transit stations, while protecting and preserving surrounding low-density neighborhoods from the encroachment of incompatible land uses.

Policy 3.15.3: Increase the density generally within one quarter mile of transit stations, determining appropriate locations based on consideration of the surrounding land use characteristics to improve their viability as new transit routes and stations are funded in accordance with Policy 3.1.6.

Chapter 4: Housing Chapter

Objective 4.2: Encourage the location of new multi-family housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher density developments and surrounding lower density residential neighborhoods.

Policy 4.2.1: Offer incentives to include housing for very low- and low-income households in mixed-use developments.

Chapter 5: Urban Form and Neighborhood Design Chapter

Objective 5.2: Encourage future development in centers and in nodes along corridors that are served by transit and are already functioning as centers for the surrounding neighborhoods, the community, or the region.

Objective 5.5: Enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm.

Chapter 7: Economic Development

Objective 7.9: Ensure that the available range of housing opportunities is sufficient, in terms of location, concentration, type, size, price/rent range, access to local services and access to transportation, to accommodate future population growth and enable a reasonable portion of the City's work force to both live and work in the City.

Policy 7.9.1: Promote the provision of affordable housing through means which require minimal subsidy levels and which, therefore, are less detrimental to the City's fiscal structure.

Policy 7.9.2: Concentrate future residential development along mixed-use corridors, transit corridors and other development nodes identified in the General Plan Framework Element, to optimize the impact of City capital expenditures on infrastructure improvements.

The Framework Element establishes land use categories whose locations are depicted on the Long-Range Land Use Diagram. These categories are broadly described by ranges of intensity, density, height, and use. The project site is within the Wilshire Community Plan with the land use designation of General Commercial. Neighborhoods within these land use designations typically contain a mix of commercial uses, multi-family uses and mixed-use buildings.

The proposed project involves the construction of a 6-story, mixed-use project that includes 40 dwelling units and 2,143 sq ft of commercial space on the ground floor. The multi-family portion would result in a net increase in housing, including affordable housing for Very Low-Income Households, in the Wilshire Community, which would help meet the anticipated growth in demand for housing within the area and the City. The project

proposes the development of infill multi-family development within an existing urbanized setting with a diversity of land uses, is within an area well-served by existing transit routes and would provide bicycle parking spaces in compliance with the LAMC's requirements. As a result, this will reduce car dependency for trips and contribute to greater quality of life and air quality. This serves to create a vibrant pedestrian experience that enhances the surrounding community.

Transit Type	Transit Name	Transit Stop	Distance (feet)	Walk Time (min)	Bicycle Time (min)
Local Bus (15 min)	Metro 212	La Brea Oakwood	100	0.4	0.1
Commuter	AVTA 786	La Brea/Beverly	500	1.8	0.6
Local Bus (15 min)	Metro 14/37	Beverly/La Brea	600	2.2	0.7
Local Bus	Metro 10/48	La Brea/Melrose	1,850	6.8	2.2
Local Bus (15 min)	Metro 16	La Brea/3rd	3,250	11.9	3.8
Subway	Metro D/Purple Line (will open in 2025)	Wilshire/La Brea	5,280	19.4	6.3

Total Transit Opportunities: 6

The project site offers several transit options that will serve future residents and visitors while aligning with the City's overall objective of encouraging multi-family housing near transit, including the Metro 14 (Beverly) and Metro 212 (La Brea), which qualify the intersection of Beverly and La Brea as a Major Transit Stop. The site is approximately 600 feet away from said intersection.

The buses listed above provide access to many areas within the city. The proposed project will not only concentrate multi-family development near existing transit stops but will provide opportunities to increase the amount of pedestrian activity. By increasing density for Angelenos near major transit stops, the proposed project would be consistent with the Framework Element.

Housing Element

The Regional Housing Needs Assessment (RHNA) is the State required process to ensure cities and counties are planning for enough housing to accommodate all economic segments of the community. For this current Housing Element 6th cycle (2021-2029), the regional Southern California Association of Governments (SCAG) issued a target of 456,643 housing units for the entire City of Los Angeles, of which 184,721 units (40%) are designated for very low-and low-income households.

When the City submitted their Housing Element to the California Department of Housing and Community Development (HCD) for approval in February of 2022, HCD rejected it¹. HCD informed the City that it must re-zone more quickly to comply with stricter state laws that are aimed at more development across California. Under the ruling, the city must rezone for 255,000 new homes by mid-October, instead of over the next three years. Accordingly, the Department of City Planning and the Los Angeles Housing Department

¹California Department of Housing and Community Development, <https://planning.lacity.org/documentf058cf1b-ce3a-4e10-ad079972e24585e2/HCDcommentLetter.pdf>

worked together to address the feedback received from HCD and to prepare targeted amendments to address the new Affirmatively Furthering Fair Housing (AFFH) requirements.

The Los Angeles City Council adopted the targeted amendments to the 2021-2029 Housing Element (approved on June 14, 2022 via Council File No. 21-1230-S1). The amended Housing Element was provided to HCD immediately after its adoption for review and certification². On June 29, 2022, HCD confirmed that the amended Housing Element is in full compliance with State Housing Element Law³.

The Housing Element identified five primary goals that would guide the Element:

Goal 1: A City where housing production results in an ample supply of housing to create more equitable and affordable portions that meet existing and projected needs.

Objective 1.1: forecast and plan for existing and projected housing needs over time with the intention of furthering Citywide Housing Priorities.

Goal 2: A City that preserves and enhances the quality of housing and provides greater housing stability for households of all income levels.

Objective 1.2: facilitate the production of housing, especially projects that include Affordable Housing and/or meet Citywide Housing Priorities

Goal 3: A City in which housing creates healthy, livable, sustainable, and resilient communities that improve the lives of all Angelenos.

Objective 3.2: Promote environmentally sustainable buildings and land use patterns that support a mix of uses, housing for various income levels and provide access to jobs, amenities, services and transportation options.

Goal 4: A City that fosters racially and socially inclusive neighborhoods and corrects the harms of historic racial, ethnic, and social discrimination of the past and present.

Objective 4.1 ensure that housing opportunities are accessible to all residents without discrimination on the basis of race, color, ancestry, sex, national origin, color, religion, sexual orientation, gender identity, marital status, immigration status, family status, age, intellectual, developmental, and physical disability, source of income and student status or other arbitrary reason.

Goal 5: A City that is committed to preventing and ending homelessness.

Objective 4.2 promote outreach and education on fair housing practices and accessibility among residents, community stakeholders and those involved in the production, preservation and operation of housing

The proposed project will not demolish any existing housing units and will build 33 residential dwelling units. Through utilizing the State Density Bonus Law (SDBL), the applicant will be setting aside 16% or 5 units to Very Low Income households. The project will result in a net increase of 40 dwelling units on the site in close proximity to jobs, transit and other amenities (see section (b) below and the Surrounding Area subsection of the

² Los Angeles Housing Element 2021-2029, news: <https://planning.lacity.org/plans/policies/community-plan-update/housing-elements-news/city-council-adopts-targeted-amendments>

³ California Department of Housing and Community Development: <https://planning.lacity.org/odocument/c30f832f-9f9-47ff-bcc0-69f33b197a11/LaCity/AdoptedIN062922>.

Context section of the Background & Findings document in the main case file). The Housing Element encourages more housing units to accommodate the City's projected growth and envisions a variety of unit types and sizes and amenities that can satisfy the needs and demand of people of all income levels, races, and ages. The Housing Element indicates that not only are more housing units needed to accommodate the City's growth, but that these units need to be a broader array of typologies to meet evolving household types and sizes. The project will offer a range of apartment types and sizes, with a mix of one and two-bedroom units. To ensure the livability of these housing units, the project includes 4,832 square feet of open space for residents, including a recreation room, a central courtyard and a rooftop deck. In addition, by setting aside 16% of the base density as restricted affordable units with 5 Very Low Income units, the proposed project will be achieving the Housing Element goal of promoting mixed-income developments in transit-oriented communities.

The Housing Element encourages higher density developments adjacent to transit corridors and especially in proximity to employment centers, as demonstrated in the Surrounding Area section above. Due to the site's proximity to major employment centers, the project is in furtherance of "It is the overall housing vision of the City of Los Angeles to create housing opportunities that enhance affordability, equity, livability and sustainability by remedying discriminatory housing practices and creating a city with a range of housing types, sizes, and costs in close proximity to jobs, transit, amenities, and services. In keeping with a fundamental belief that housing is a human right, the City will work towards ensuring that housing stability and affordability is provided to all residents."⁴ The project is near La Brea Ave and Beverly Blvd, classified as an Avenue I and Modified Avenue II by the Mobility Plan 2035. The project site is near multi-modal corridors served by several bus lines including Metro lines 14/37 and the Metro 10/48 and AVTA 786 lines. Since the proposed project is comprised of 40 residential apartment units, including 5 affordable housing units, all within walking and biking distance of several transit opportunities, it meets the Housing Element's stated goals, objectives, and policies.

Mobility Element

The Mobility Plan 2035 includes goals that define the City's high-level mobility priorities. The Mobility Element sets forth objectives and policies to establish a citywide strategy to achieve long-term mobility and accessibility within the City of Los Angeles. The proposed project would be in conformance with following goals of the Housing Element as described below.

Chapter 3: Access for All Angelenos

Objective: *Ensure that 90 percent of households have access within one mile to the Transit Enhanced Network by 2035.*

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 3.8: *Provide bicyclists with convenient, secure, and well-maintained bicycle parking facilities.*

The proposed multi-family building is a pedestrian-oriented development that provides affordable and market-rate housing in proximity to several transit options. As previously

⁴ "Housing Goals, Objectives, Policies and Programs" of the Housing Element – page 20 of the Executive Summary

mentioned, the project site is located within ½ mile of an intersection serving the Metro 14/37 and Metro 212 with 15-minute headways at the peak hours. The site is also near several other transit stops, as detailed in the transit table above. These transit stations provide access to employment centers and jobs, local and regional destinations, and other neighborhood services for project residents. The proposed project will also allow for reduction of vehicle trips by placing high density residential within proximity to public transit. The project is consistent with the Mobility Element because residents will have easy access to work opportunities and essential services, and greater mobility is assured by the plentiful transit options offered by the Metro and other providers. Furthermore, the location of the ground floor residential lobby will facilitate a pedestrian-oriented environment by providing transparency at the street level, and activating the streets with greater pedestrian activity, as residents will be encouraged to walk and use public transit. In addition, the Mobility Plan incorporates the complete streets principles to accommodate all modes of transportation including foot traffic and bicyclists. The project also provides 43 bicycle parking spaces within a convenient, secure, and easily accessible parking facility. As such, the project conforms to the goals, objectives, and policies of the Mobility Element.

Land Use Element – Wilshire Community Plan Area

The Wilshire Community Plan was adopted by the City Council on September 19, 2001. The Community Plan's purpose is "preserving and enhancing the positive characteristics of existing residential neighborhoods while providing a variety of housing opportunities while compatible new housing", while "improving the function, design and economic vitality of the commercial corridors" as well as "maximizing the development opportunities of future transit systems while minimizing any adverse impacts". The proposed project would be in conformance with following goals of the Land Use Element as described below.

Residential

Goal 1 – *Provide a safe, secure, and high quality residential environmental for all economic, age, and ethnic segments of the Wilshire community.*

Objective 1-1 – *To provide for the preservation of existing 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.*

Policy 1-1.2 – *Promote neighborhood preservation in all stable residential neighborhoods.*

Policy 1-1.3 – *Provide for adequate Multiple Family residential development.*

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.*

Policy 1-2.1 – *Encourage higher density residential uses near major public transportation centers.*

Objective 1-3 – *Preserve and enhance the varied and distinct residential character and integrity of existing residential neighborhoods.*

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

Policy 1-3.2 – Support historic preservation goals in neighborhoods of architectural merit and/or historic significance.

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

Policy 1-4.1 – Promote greater individual choice in type, quality, price and location of housing.

Policy 1-4.2 – Ensure that new housing opportunities minimize displacement of residents.

The Wilshire Community Plan designates the site for General Commercial. The zoning designation for the subject site is C2-1VL. The C2-1VL zone allows up to 28 base dwelling units on the project site based on the lot area. The SDBL allow a 35 percent increase in the base density. The subject SDBL project meets all the criteria to qualify for the requested incentives and allows the proposed 35 market rate units and 5 Very Low Income units.

The project proposes a mixed-use development in an area that is close to a variety of transit stations (see table above), connecting the project site to other regional and local destinations as well as employment centers and retail services. The project will contribute to the Wilshire area as a high-density, mixed-use development that provides housing for residents of the area. The project provides adequate usable open space that is thoughtfully designed to provide active open space options for the future users of the building.

This project involves the construction of a 6-story, multi-family project that includes 40 dwelling units. The multi-family project would develop a net increase in housing, including affordable housing for Very Low Income households in the Wilshire community, which would help meet the anticipated growth in demand for housing within the area and the City. The design of the ground floor enhances the pedestrian experience by having greater transparency, more glazing and eyes on the street, creating a safer and more interesting edge to walk along. The residential lobby on Oakwood Ave serves as the main entrance to the project. The ground floor of the structure also fortifies the street identity and character by enhancing the sustainability of the living environment.

The project site is not located in a Special Grading Area (BOE Basic Grid Map A-13372), Very High Fire Severity Zone, Fire District No. 1, Flood Zone, Alquist-Priolo Fault Zone, Liquefaction Zone, or a Landslide area. While the project is located within a Methane Zone, Regulatory Compliance Measures (RCMs) will ensure that the proposed development will be constructed in such a manner to minimize any potentially significant impacts. LADBS requires a methane specialist to prepare a report using on-site testing to identify methane intrusion emanating from geologic formations. RCM's required by the City of Los Angeles pertaining to ventilation and methane gas detection systems must be built into the design of the project based on the report's findings. As such, there will be no significant impacts related to methane. Considering the project site location and relevant RCMs to avoid potential impacts in special overlays, it can be found that the site is suitable for multi-family development.

The proposed project is well-designed and meets the applicable Citywide Design Guidelines⁵. The massing, articulation, colors and materials of the building have been thoughtfully designed to appear visually interesting. The proposed development features a strong façade rhythm through its placement and design of balconies, materials and colors. The use of large clear glass windows and ground floor lighting enhances neighborhood safety while maintaining visual connection between interior and exterior. Additionally, the ground floor entryway and landscaping will create an active street presence and pedestrian scale.

In light of the information presented, it can be found that the project is consistent with the applicable general plan designation and all applicable general plan policies as well as the applicable zoning designation and regulations.

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

The project is comprised of three lots totaling 10,393 sq ft (or 0.23 acres) which is well below the 5-acre threshold.

Significant and notable land uses near the subject property include:

- Cedars Sinai Hospital
- Miracle Mile
- The Grove
- Beverly Center
- Hollywood
- West Hollywood

Adjacent properties to the subject property include:

Direction	Zone	Use
Northwest	R1V2	SFD
North	C2-1VL	2-Story Furniture Store
Northeast	C2-1VL	1-story Bank
East	C2-1VL	2/3-story Synagogue
South	C2-1VL	1-story Jewelry Store
Southwest	R2-1	2-Story Duplex
West	R2-1	2-Story Duplex

The table above describes the uses that are directly adjacent as well as within the surrounding area. It is indicative of the uses seen near transit corridors within a further radius as well. The site is located near several arterial streets including La Brea Ave, Melrose Ave, and Beverly Blvd. Therefore, the site can be characterized as being substantially surrounded by urban uses.

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

The project is situated in an established, built out, residential neighborhood on a major commercial corridor and near other large employment centers. The immediate vicinity is

⁵ See compliance with Citywide Design Guidelines within the case file

fairly urbanized and is comprised of commercial and residential structures, transit and arterial corridors. The site is currently fully developed with a one-story commercial building and associated parking. The subject property does not have reported occurrences of special-status species in the California Natural Diversity Database (CNDDDB) maintained by the California Department of Fish and Wildlife (CDFW). The project site does not include riparian areas or other sensitive plant communities. According to the United States Fish and Wildlife Service Information for Planning and Consultation Tool, the project site does not contain critical habitats for any endangered, rare, or threatened species.

NavigateLA and the Los Angeles City Planning Department's Environmental and Public Facilities map for Significant Ecological Areas show that the subject site is not located in any of these areas.

Therefore, it can be found that the project site has no value as habitat for endangered, rare or threatened species.

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

Traffic

Per the attached City of Los Angeles VMT Calculation Project Screening Criteria, the project generates less than 250 net daily trips, which is the threshold that determines whether a traffic study is required. DOT staff has reviewed and signed the DOT Referral Form on June 14, 2024 verifying that this information is accurate. As such, the project will not have any significant impacts relating to traffic.

Noise

A technical report⁶ was prepared by DKA Planning that analyzed potential noise impacts due to project's on-site construction activities, off-site construction activities, on-site operational noise sources, and off-site operational noise sources. The report concluded that due to Regulatory Compliance Measures, the project scope, design, and site surroundings, the Project would not result in any significant noise impacts and no mitigation measures are required.

Air Quality

A technical report⁷ was prepared by DKA Planning that analyzed potential air quality impacts due to the project's construction activities and operational sources. The report concluded that due to Regulatory Compliance Measures, the project scope, design, and site surroundings, the Project would not result in any significant noise impacts and no mitigation measures are required.

Water Quality

The development of the project would not result in any significant effects relating to water quality. The project is not adjacent to any water sources and does not involve extensive excavation that might have an impact on the water table. Therefore, construction of the project will not create any impact on water quality. Furthermore, the project will comply with the City's storm water management provisions per LAMC 64.70.

⁶ See Noise Technical Report prepared by DKA Planning dated July 2024

⁷ See Air Quality Technical Report prepared by DKA Planning dated August 2023

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

The site is currently being served adequately by the City's Department of Water and Power, the City's Bureau of Sanitation, the SoCal Gas Company, the Los Angeles Police Department, the Los Angeles Fire Department, and many other public services. The utilities and public services have been servicing the neighborhood continuously for over 50 years. In addition, the California Green Code requires new construction to meet stringent efficiency standards for both water and power, such as high-efficiency toilets, dual-flush water closets, minimum irrigation standards, LED lighting, etc. As a result of these new building codes that are required of all projects, it can be anticipated that the project will not create any impact on existing utilities and public services through the net addition of 40 dwelling units.

CEQA Section 15300.2

Exceptions

Categorical Exemptions are descriptions of types of projects which the Secretary of the Resources Agency has determined do not usually have a significant effect on the environment. There are exceptions to the exemptions depending on the nature or location of the project. Projects that meet the following conditions are considered exceptions and do not qualify for a Categorical Exemption:

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

The project is not utilizing Class 3, 4, 5, 6 or 11 and therefore does not meet this condition.

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

The cumulative impact analysis considers the potential impacts associated with implementation of the project in conjunction with other "related projects" within proximity of the project site. There are no related projects as identified by the City of Los Angeles within 1,500 feet of the project site⁸.

As discussed below, the project would not contribute to any significant cumulative impacts resulting from successive projects of the same type in the same place over time.

Land Use Plans and Zoning

The focus of this cumulative impacts analysis is on the combined impact of the project and the related projects, including consistency with land use plans and zoning. Development of the related projects is expected to occur in accordance with adopted plans and regulations.

⁸ Communication from DKA Planning (see Air Quality Study) with Ira Rodriguez, Transportation Engineering Associate II; City of Los Angeles Department of Transportation; July 2, 2024

It is also reasonably anticipated that most of the related projects would be designed and/or conditioned to be compatible with the zoning and land use designations of each related project site and its existing surrounding uses. In addition, it is reasonable to assume that the related projects under consideration in the surrounding area would implement and support local and regional planning goals and policies. Therefore, cumulative land use impacts would be less than significant.

Endangered, Rare, or Threatened Species

The project site contains a fully built out urban use that is completely surrounded by urban uses. The project site has been subject to substantial disturbance associated with the construction of the existing structure. As such, the project site does not exhibit potential to support endangered, rare, or threatened plant species.

The project site is disturbed and fully built out, relative to the presence of natural habitats, and surrounding areas are entirely developed; therefore, the project site does not provide potential habitat for endangered, rare, or threatened animal species. Some examples of these disturbances that deter animals include complete absence of native habitats or vegetation, substantial vehicle traffic, artificial lighting, regular vegetation maintenance, domesticated and feral dogs and cats, and pest management.

No special status habitats are present on the project site and there is no potential to occur.

Traffic

Per the attached City of Los Angeles VMT Calculation Project Screening Criteria, the project generates less than 250 net daily trips, which is the threshold that determines whether a traffic study is required. DOT staff has reviewed and signed the DOT Referral Form on June 14, 2024 verifying that this information is accurate. As such, the project will not have any significant impacts relating to traffic.

OPR's *Technical Advisory on Evaluating Transportation Impacts in CEQA* states the following regarding cumulative traffic impacts:

Cumulative Impacts. A project's cumulative impacts are based on an assessment of whether the "incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects." (Pub. Resources Code, § 21083, subd. (b)(2); see CEQA Guidelines, § 15064, subd. (h)(1).) When using an absolute VMT metric, i.e., total VMT (as recommended below for retail and transportation projects), analyzing the combined impacts for a cumulative impacts analysis may be appropriate. However, metrics such as VMT per capita or VMT per employee, i.e., metrics framed in terms of efficiency (as recommended below for use on residential and office projects), cannot be summed because they employ a denominator. A project that falls below an efficiency based threshold that is aligned with long-term goals and relevant plans has no cumulative impact distinct from the project impact. Accordingly, a finding of a less-than-significant project impact would imply a less than significant cumulative impact, and vice versa. This is similar to the analysis typically conducted for greenhouse gas emissions, air quality impacts, and impacts that utilize plan compliance as a threshold of significance. (See Center for Biological Diversity v. Department of Fish & Wildlife (2015) 62 Cal.4th 204, 219, 223; CEQA Guidelines, § 15064, subd. (h)(3).)

As discussed above, the project is screened out from further VMT analysis, as it is presumed the project would cause less-than-significant transportation impacts. For this

reason, the project's cumulative contribution to traffic impacts would also be less than significant.

Noise

The technical report⁹ prepared by DKA Planning analyzing potential noise impacts also analyzed potential cumulative impacts and reached a conclusion that no cumulative noise impacts would occur.

Air Quality

The technical report¹⁰ prepared by DKA Planning analyzing potential air quality impacts also analyzed potential cumulative impacts and reached a conclusion that no cumulative noise impacts would occur.

Water Quality

The project site and the related project are located in an urbanized area where all of the surrounding properties are already developed. The existing storm drainage system serving this area has been designed to accommodate runoff from an urban built-out environment. When new construction occurs, it generally does not lead to substantial additional runoff, since new development is required to control the amount, velocity, and quality of stormwater runoff coming from their respective site. Moreover, little if any additional cumulative runoff is expected from the project and the related project site, since the area is highly developed with impervious surfaces. Additionally, all new development in the City is required to comply with the City's LID Ordinance and incorporate appropriate stormwater pollution control measures into the design plans to ensure that water quality impacts are minimized. Therefore, the cumulative water quality impact of successive projects of the same type in the same place over time would not be significant. With respect to construction impacts, it is unknown whether any of the other development projects in the vicinity would have overlapping construction schedules with the project. However, similar to the project, any related projects would be required to comply with the City Building Code, NPDES requirements, etc. Assuming compliance with these regulatory requirements, similar to the project, the cumulative water quality impact during construction would be less than significant.

Utilities & Public Services

Water

Implementation of the related projects listed in the table above could result in a net increase in water consumption within LADWP's service area. Similar to the project, the water demand for those related projects that are consistent with the City's General Plan have been accounted for in the most recently adopted UWMP. The 2015 UWMP anticipates that the future water supplies would be sufficient to meeting existing and planned growth in the City to the year 2040 (the planning horizon required of 2015 UWMPs) under wet and dry year scenarios. The applicants of all projects within LADWP's service area would be required to consult with LADWP to determine the specific water supply needs of the project, appropriate water conservation measures to minimize water usage, and LADWP's ability to serve the project. In addition, the project would create the need for a fraction of one percent of the remaining capacity of the LAAPF, and would not result in any significant impacts related to water treatment. No new or upgraded treatment facilities would be required. As

⁹ See Noise Technical Report prepared by DKA Planning dated July 2024

¹⁰ See Air Quality Technical Report prepared by DKA Planning dated July 2024

such, the cumulative water impacts of successive projects of the same type in the same place over time would not be significant.

Wastewater

Implementation of the related projects listed in the table above would increase utilization of the HTP's available wastewater treatment capacity. Currently, the HTP has a typical remaining capacity of over 100 mgd of wastewater able to be treated at the HTP. Therefore, the project would create the need for a fraction of one percent of the remaining capacity of the HTP, and would not result in any significant impacts related to sewer treatment. No new or upgraded treatment facilities would be required. Moreover, with respect to wastewater infrastructure in the City, under the rules and regulations established in the City's Sewer Allocation Ordinance (Ordinance No. 166,060), the Bureau of Sanitation assesses the anticipated wastewater flows from development projects at the time of connection, and makes the appropriate decisions on how best to connect to the local sewer lines at the time of construction. The applicants for each of the related projects will be required to submit a Sewer Capacity Availability Request to verify the anticipated sewer flows and points of connection and to assess the condition and capacity of the sewer lines receiving additional sewer flows from the project and other cumulative development projects. If it is determined that the sewer system in the local area has insufficient capacity to serve a particular development, the developer of that project would be required to replace or build new sewer lines to a point in the sewer system with sufficient capacity to accommodate that project's increased flows. Each project would be evaluated on a case-by-case basis and would be required to consult with the Bureau of Sanitation (for projects within the City) and comply with all applicable City and State water conservation programs and sewer allocation ordinances. Therefore, the cumulative impact pertaining to wastewater infrastructure would be less than significant.

Solid Waste

Implementation of the project in combination with other projects within the Southern California region that are serviced by area landfills will increase regional demands on landfill capacities. Construction of the project and related projects generate construction and demolition waste, resulting in a cumulative increase in the demand for inert landfill capacity. Given the requirements of the Citywide Construction & Demolition Debris Recycling Ordinance (Ordinance No. 181,519), which requires all mixed construction and demolition waste generated within City limits be taken to a City-certified construction and demolition waste processor, it is anticipated that future cumulative development within the City would also implement similar measures to divert construction and demolition waste from landfills.

Operation of the project in conjunction with other projects within the Southern California region that are serviced by area landfills would generate municipal solid waste and result in a cumulative increase in the demand for waste disposal capacity at Class III landfills. The countywide demand for landfill capacity is continually evaluated by Los Angeles County through preparation of the County Integrated Waste Management Plan Annual Reports. Each Annual Report assesses future landfill disposal needs over a 15-year planning horizon. As such, the 2016 Annual Report (published September 2017) projects waste generation and available landfill capacity through 2031. Moreover, a State-mandated 75 percent landfill diversion rate is required by 2020, which would reduce the amount of solid waste being landfilled for the related projects. The project's estimated net increase in operational solid waste generation, in conjunction with the related projects, would represent an insignificant portion of the remaining landfill capacity serving the project area and would

not result in any significant impacts. Therefore, cumulative impacts from operational solid waste would be less than significant.

Natural Gas

Implementation of the project, in conjunction with the related projects, would increase demands for natural gas. Energy consumption by new buildings in California is regulated by the State Building Energy Efficiency Standards, embodied in Title 24 of the California Code of Regulations. The efficiency standards apply to new construction of both residential and non-residential buildings and regulate insulation, glazing, lighting, shading, and water- and space-heating systems. Building efficiency standards are enforced through the local building permit process. The City has adopted green building standards consistent with Title 24 as the LA Green Building Code. Similar to the project, related projects and future development must also abide by the same statutes, regulations, and programs that mandate or encourage energy conservation. SoCalGas is also required to plan for necessary upgrades and expansion to its systems to ensure that adequate service will be provided for other projects. Specifically, SoCalGas regularly updates its infrastructure reports as required by law. In addition, there is no evidence to suggest that SoCalGas will not be able to serve its service areas in the coming years. Therefore, cumulative impacts are less than significant.

Electricity

Implementation of the project, in conjunction with the related projects, would increase demands for electrical power. As discussed above, LADWP utilizes renewable energy sources and is committed to meeting the requirement of the RPS Enforcement Program to use at least 65 percent of the State's energy from renewables by 2036. All new development in California is required to be designed and constructed in conformance with State Building Energy Efficiency Standards outlined in Title 24. It is possible that implementation of the related projects, as well as other development in the LADWP service area, could require the removal of older structures that were not designed and constructed to conform with the more recent and stringent energy efficiency standards. Thus, it is possible that with implementation of some of the related projects and other development, the resulting demand for electricity supply could be the same or less than the existing condition. Nonetheless, the 2017 SLTRP considers a 20-year planning horizon to guide LADWP as it executes major new and replacement projects and programs. Through the SLTRP, LADWP undertakes expansion or modification of electrical service infrastructure and distribution systems to serve future growth in the City as required in the normal process of providing electrical service. Any potential cumulative impacts related to electric power service would be addressed through this process. Therefore, cumulative impacts related to electricity supply and infrastructure would be less than significant.

Fire Protection

Development of the project in combination with the related projects in the table above could result in a net increase in the number of residents and employees in the project area and could further increase the demand for fire protection services. Any new or expanded fire station would be funded via existing mechanisms (e.g., property and sales taxes, government funding, and developer fees) to which the project and cumulative growth would contribute. Similar to the proposed project, the related projects would be subject to the Fire Code and other applicable regulations of the LAMC including, but not limited to, automatic fire sprinkler systems for high-density buildings and/or residential projects located farther than 1.5 miles from the nearest LAFD Engine or Truck Company, assessment of available fire flow and required enhancements to existing infrastructure, and other recommendations

made by the LAFD to ensure fire protection safety. Through this process of compliance, the ability of the LAFD to provide adequate facilities to accommodate future growth and maintain acceptable levels of service would be ensured. Therefore, the cumulative impact to fire protection from successive projects of the same type in the same place over time would not be significant.

Police Protection

Implementation of the related projects listed in the table above could result in a net increase in the number of residents and employees in the project area and could further increase the demand for police protection services. The increased demands for additional LAPD staffing, equipment, and facilities would be funded via existing mechanisms (e.g., property taxes and government funding) to which the proposed project and related projects would contribute. Similar to the project, other projects served by LAPD would implement safety and security features per the City's Crime Prevention through Environmental Design Guidelines¹¹. Therefore, the cumulative impact to police protection from successive projects of the same type in the same place over time would not be significant.

Schools

The related projects listed in the table above could result in an increase in the number students in the project site area. However, payment of developer impact fees in accordance with SB 50 and pursuant to Section 65995 of the California Government Code would ensure that the impacts of the project on school facilities would be less than significant. Similar to the project, the related projects would be required to pay school fees to the appropriate school district wherein their site is located. The payment of school fees would fully address any potential impacts to school facilities by the proposed project or the related projects. Therefore, cumulative impacts would be less than significant.

Recreation & Parks

The related projects listed in the table above could result in an increase demand for parks. Development projects that include residential land uses would be subject to the City's parkland fees (e.g., Quimby Fees and/or Park and Recreation fees) and to minimum open space requirements, ensuring that any potential impacts to parks would be less than significant. The payment of fees would address potential impacts to park and recreational facilities by the proposed project or the related project. Employees generated by the commercial projects and the commercial portions of mixed-use projects on the related projects list would not typically enjoy long periods of time during the workday to visit parks. Additionally, it is expected that the majority of the employees of the commercial projects live within a reasonably close distance to said projects. Thus, these related-project-generated employees would not substantially contribute to the future demand for parks. Therefore, the cumulative impact would be less than significant.

Libraries

Implementation of the related projects listed in the table above could increase the demand for library services in the project site area. The related residential projects would be subject to the standards to determine demand for library facilities used by the City. However, library funding is now mandated under the City Charter to be funded from property taxes including those assessed against the project, which would increase with new development. The project as well as the related projects within the City would be required to pay these fees

¹¹ City of Los Angeles Design Out Crime Guidelines: Crime Prevention through Environmental Design, November 1997: https://planning.lacity.org/policyinitiatives/CPTED/CPTED_Guidelines.pdf

as applicable. As such, the demand for library services created by these residential projects could be accommodated, and impacts would be less than significant. Therefore, the cumulative impact to libraries from successive projects of the same type in the same place over time would not be significant.

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

There are no unusual circumstances with the project site or the proposed project that would create a reasonable possibility of significant effects to the environment. The project site is located within a highly urbanized setting, and the site would be developed from a single-story commercial building to a mixed-use development, which is a typical urban land use appropriate for the area. As stated in condition (a) of the Class 32 findings, above, the project would be consistent with the City's underlying zoning and land use designation. The project will utilize conventional construction methods to demolish the existing improvements and to build the proposed project. The site is substantially surrounded by similar projects and is characterized as a flat parcel that is not within any environmentally or biologically sensitive areas as mapped or designated by Federal, State or local agencies. The project is not located in a hazardous zone such as a flood zone or liquefaction. While the project is located within a Methane Zone, Regulatory Compliance Measures (RCMs) will ensure that the proposed development will be constructed in such a manner to minimize any potentially significant impacts. LADBS requires a methane specialist to prepare a report using on-site testing to identify methane intrusion emanating from geologic formations. RCM's required by the City of Los Angeles pertaining to ventilation and methane gas detection systems must be built into the design of the project based on the report's findings. As such, there will be no significant impacts related to methane. Considering the project site location and relevant RCMs to avoid potential impacts in special overlays, it can be found that the site is suitable for multi-family development. Additionally, the project site is not located in a designated "environmentally sensitive area" (see condition (c) of the Class 32 findings above) or other overlay that would denote special circumstances.

Moreover, as stated above, the project would not result in any project-specific or cumulative traffic, noise, air quality, or water quality impacts. The proposed land uses are consistent and compatible with the site's urban setting and are typical for an infill development located near transit and on a major City thoroughfare. Therefore, as there are no unusual circumstances regarding the proposed project or project site, the exception is not applicable to the project.

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

La Brea Ave is not officially designated as a State scenic highway, and there are no officially designated scenic highways in the immediate vicinity of the project site. As such, no damage will result to any scenic resources.

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

The property is not included on any list compiled pursuant to Section 65962.5 of the Government Code. However, a Phase I ESA Report, dated April 15, 2022, found that between 1928 and the 1950's, auto and gasoline services were provided on the site. As such, a Phase II was recommended for further testing. A Phase II ESA Subsurface Investigation by ENCON in July 2022 was conducted to evaluate the potential impact of automotive petroleum hydrocarbons and volatile organic compounds to soil and soil gas from the former gas service station that operated at the subject site between 1928 and 1953, as well as the recent Hertz Rental car wash clarifier activities based on the findings and recommendations provided in the Partner Phase I ESA Report, dated April 15, 2022. While the study found that there is not significant release from the former gas station and auto service operations, it only provided clearance for future commercial use. As such, a Phase II ESA Addendum was carried out in July of 2024 to evaluate the current commercial subject site environmental conditions for residential redevelopment planning purposes. The study found that based on the Phase II ESA Soil and Soil Gas Investigation findings and evaluations, the subject site can be classified as a low environmental risk site that poses no significant threat to the environment or State groundwater beneath the subject site, or to the occupants and public health at this time for the current commercial retail use. With regard to future residential development, the study does not anticipate a significant threat to indoor air quality and will not pose an elevated health risk to the occupants, workers or public for any residential new development in the future. The subject site is a low environmental vapor intrusion risk site, and the vapor intrusion assessment results suggest that the subject site present site environmental conditions are acceptable and safe for the future residential redevelopment use purposes.

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

Research was carried out utilizing a variety of sources to identify if the existing commercial building had any potential historic considerations. In January of 2015, the Historic Resources Survey Report for the Wilshire Community Plan Area was completed as part of the SurveyLA program for the City of Los Angeles. After review of the report and its subsections, Individual Resources, Non-Parcel Resources, Historic Districts, Planning Districts and Multi-Property Resources, no reference was found to the subject property. A review of the City of Los Angeles' Zone Information and Map Access System concludes that the existing improvements are not listed in any local, state or national register. Additionally, the subject property was searched against the City's Historic Places LA information system and no results were found that indicate the existing improvements contain any historic value.

Therefore, there is no substantial evidence that the proposed Project will have a specific adverse impact on the physical environment, on public health and safety, or on property listed in the California Register of Historic Resources.

Conclusion

Since each finding above has been found in the negative, the project is not considered an exception and is qualified to utilize a Categorical Exemption. There are no unusual circumstances regarding the Project Site or the Project; consequently, there is no reasonable possibility that the Project will have a significant effect on the environment due to unusual circumstances, and these exceptions does not apply to the Project.

The project can be characterized as in-fill development within urban areas for the purpose of qualifying for Class 32 Categorical Exemption as a result of meeting the five conditions listed above.