DEPARTMENT OF CITY PLANNING

RECOMMENDATION REPORT

City Planning Commission

Date: July 10, 2025
Time: After 8:30 a.m.*
Place: Los Angeles City Hall
Council Chamber, Room 340
200 North Spring Street
Los Angeles, CA 90012

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

Public Hearing: March 5, 2025
Appeal Status: Sign District and Transfer of Development Rights are appealable by the Applicant to the City Council if disapproved in whole or in part. All other actions are appealable to City Council.
Expiration Date: July 10, 2025

Case No.: CPC-2018-3336-SN-TDR-CUB-SPR-MSC
CEQA No.: ENV-2018-3337-SCEA
Related Cases: VTT-82213-1A

Council No.: 14 – Jurado
Plan Area: Downtown
Plan Overlay: N/A
Certified NC: Downtown Los Angeles
Land Use Designation: Transit Core

Zone (Vested): C2-2D-O

Applicant: Jacob Taban, Venice Hope Group, LLC.
Representative: Alex Irvine, Irvine and Associates Inc.

PROJECT LOCATION: 1600 South Flower Street (1600-1618 South Flower Street, 1601-1623 South Hope Street, 426-440 West Venice Boulevard)

PROPOSED PROJECT: The South Park Towers Project (Project) proposes the demolition of 89,510 square feet of commercial uses within four buildings for the construction of a two-tower, mixed-use development consisting of 250 residential dwelling units, 300 hotel guest rooms, and 13,120 square feet of ground floor retail uses, for a total of 452,630 floor area on an approximately 1.6-acre site, and up to 23 stories in building height.

REQUESTED ACTIONS:

ENV-2018-3337-SCEA

1. Based on the whole of the record and the decision-making body's independent judgment, the Project was analyzed in the **Sustainable Communities Environmental Assessment** No. ENV-2018-3337-SCEA (SCEA) and Erratum dated September 2024, adopted by the City Council on October 1, 2024, including the adoption of the **Mitigation Measures and Mitigation Monitoring Program** for the Project, and adopt the findings prepared for the SCEA, and the Mitigation Monitoring Program prepared for the SCEA;

CPC-2018-3336-SN-TDR-CUB-SPR-MSC

2. Pursuant to Los Angeles Municipal Code (LAMC) Section 12.32 S, the establishment of a **Sign District** (-SN Supplemental Use District) to provide a comprehensive set of sign regulations for the Project Site;

3. Pursuant to LAMC Section 14.5.6 B, a **Transfer of Floor Area Rights** for the transfer of greater than 50,000 square feet of floor area of up to 226,121 square feet of floor area for a Transit Area Mixed-Use Project, from the City of Los Angeles Convention Center (Donor Site) at 1201 South Figueroa Street, to the Project Site (Receiver Site), thereby permitting a maximum 6:1 Floor Area Ratio (FAR) in lieu of the otherwise permitted 3:1 FAR;

4. Pursuant to LAMC Sections 12.24 W.1 and 12.24 S, a **Conditional Use Permit** for the sale and dispensing of a full-line of alcoholic beverages for on-site consumption within the proposed hotel, and to allow a 20 percent reduction in the required amount of vehicle parking;

5. Pursuant to LAMC Section 16.05, a **Site Plan Review** for the construction of a proposed development project which will create an increase of more than 50 dwelling units or guest rooms; and

6. Pursuant to LAMC Section 12.21 G, a **Director's Determination** to allow for up to a 10 percent reduction in the total required residential open space.

RECOMMENDED ACTIONS:

ENV-2018-3337-SCEA

If the City Planning Commission (CPC) denies the appeal of the Vesting Tentative Tract Map (VTT-82213-1A) and sustains the actions of the Advisory Agency:

1. **Find**, pursuant to Public Resources Code (PRC), Section 21155.2, after consideration of the whole of the administrative record, including the SB 375 Sustainable Communities Environmental Assessment, No. ENC-2018-337-SCEA and Erratum dated September 2024, and all comments received, after imposition of all mitigation measures, there is no substantial evidence that the Project will have a significant effect on the environment; **Find** that the City Council held a hearing on and adopted the SCEA on October 1, 2024 pursuant to PRC Section 21155.2(b); **Find** the Project is a "transit priority project" as defined by PRC Section 21155, and the Project has incorporated all feasible mitigation measures, performance standards, or criteria set forth in prior EIRs, including SCAG 2020-2045 RTP/SCS EIR (SCH No. 2015031035); **Find** all potentially significant effects required to be identified in the initial study have been identified and analyzed in the SCEA; **Find** with respect to each significant effect on the environment required to be identified in the initial study for the SCEA, changes or alterations have been required in or incorporated into the Project that avoid or mitigate the significant effects to a level of insignificance or those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency; **Find** the SCEA reflects the independent judgment and analysis of the City; **Find** the mitigation measures have been made enforceable conditions on the Project; and **Adopt** the SCEA and the Mitigation Monitoring Program prepared for the SCEA.

CPC-2018-3336-SN-TDR-CUB-SPR-MSC

2. **Recommend that the City Council approve** the establishment of a **Sign District** (-SN Supplemental Use District) to provide a comprehensive set of sign regulations for the Project Site;

3. **Recommend that the City Council approve** a **Transfer of Floor Area Rights** and associated Public Benefits Payment for the transfer of greater than 50,000 square feet of floor area of up to 226,121 square feet of floor area for a Transit Area Mixed-Use Project, from the City of Los Angeles Convention Center

(Donor Site) at 1201 South Figueroa Street, to the Project Site (Receiver Site), thereby permitting a maximum 6:1 FAR in lieu of the otherwise permitted 3:1 FAR;

4. **Request** that within six months of the receipt of the Public Benefits Payment by the Public Benefit Trust Fund, the Chief Legislative Analyst convene the Public Benefit Trust Fund Committee, pursuant to LAMC Section 14.5.12;

5. **Approve** a **Conditional Use Permit** for the sale and dispensing of a full-line of alcoholic beverages for on-site consumption within the proposed hotel; and a 20 percent reduction in the required amount of vehicle parking;

6. **Approve** a **Site Plan Review** for the construction of a proposed development project which will create an increase of more than 50 dwelling units or guest rooms;

7. **Approve** a **Director's Determination** to allow for up to a 10 percent reduction in the total required residential open space;

8. **Adopt** the attached Conditions of Approval; and

9. **Adopt** the attached Findings.

VINCENT P. BERTONI, AICP
Director of Planning

Milena Zasadzien, Principal City Planner

Mindy Nguyen, Senior City Planner

More Song, City Planner

ADVICE TO PUBLIC: *The exact time this report will be considered during the meeting is uncertain since there may be several other items on the agenda. Written communications may be mailed to the Commission Secretariat, Room 272, City Hall, 200 North Spring Street, Los Angeles, CA 90012 (Phone No. 213-978-1300). While all written communications are given to the Commission for consideration, the initial packets are sent 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 may be provided upon request. To ensure availability of services, please make your request not later than three working days (72 hours) prior to the meeting by calling the Commission Secretariat at (213) 978-1300.

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Sustainable Communities Environmental Assessment (SCEA) Link (Including Erratum and Appendices): https://planning.lacity.gov/development-services/environmental-review/scea/south-park-towers-project

PROJECT ANALYSIS

PROJECT SUMMARY

The subject property (Project Site) encompasses approximately 1.6 acres (net after dedications) and is currently developed with four one- and two-story commercial buildings comprising 89,510 square feet of total floor area, as well as associated surface parking and alley areas. The South Park Towers Project (Project) proposes the demolition of all existing improvements for the construction of a new mixed-use residential and commercial development consisting of two high-rise towers as depicted in Figure 1 below. Tower 1 (Hotel Tower) would be a 22-story building with 300 hotel guest rooms and 3,120 square feet of ground floor commercial space ; and Tower 2 (Residential Tower) would be a 23-story building with 250 residential dwelling units and 10,000 square feet of ground floor commercial space. The Project would result in a total of 452,630 square feet of floor area, and would rise to a maximum height of 260 feet (for the Residential Tower). A total of 283 vehicle parking spaces would be provided within three above-ground podium levels. Additionally, an outdoor pedestrian paseo would bisect the Project Site, running north-south between the two towers and connecting Venice Boulevard to the north to a proposed circular drive-aisle on the southern portion of the Project Site.

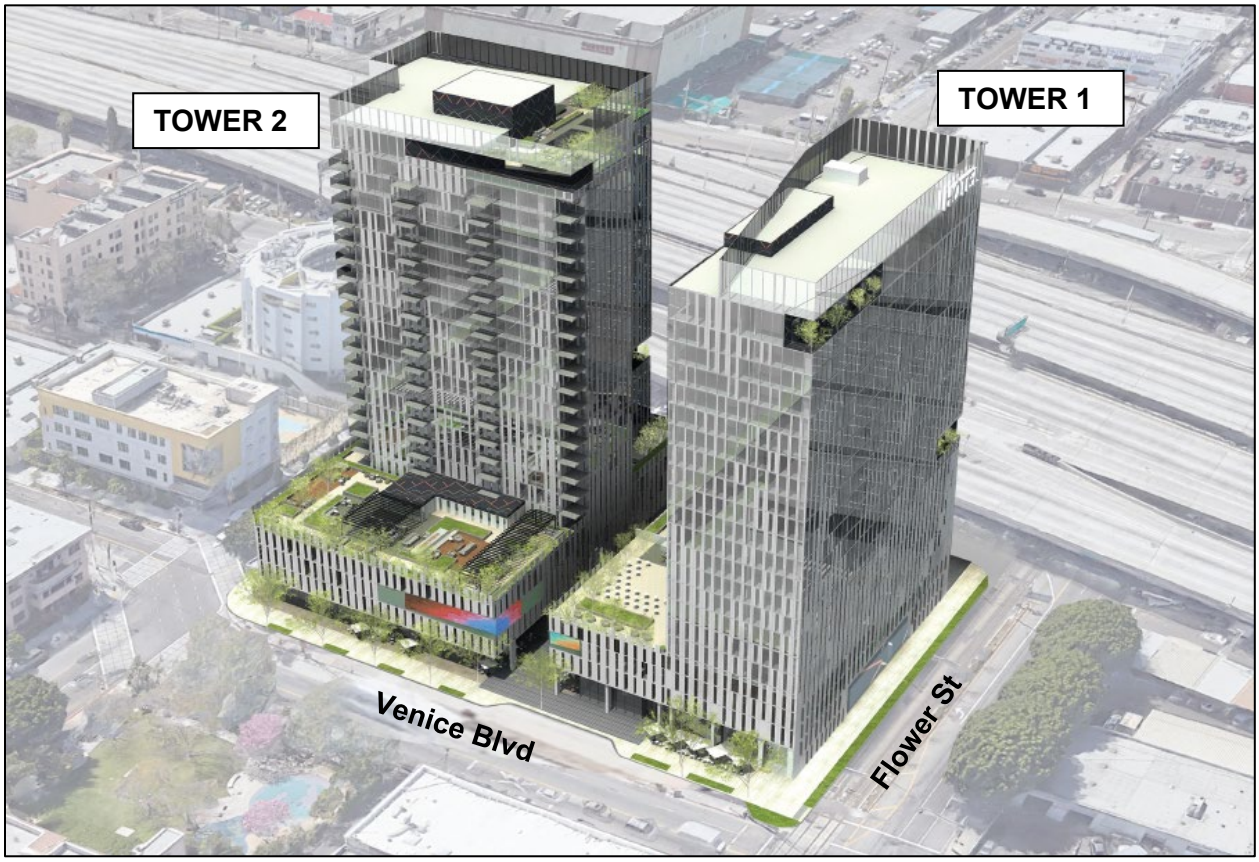

Figure 1: Rendering of Proposed Project

BACKGROUND

Location and Setting

The Project Site occupies a full city block within the Downtown Community Plan[1] area of the City of Los Angeles (City). The Project Site is located in the southern part of Downtown Los Angeles and is bounded by Venice Boulevard to the north, Hope Street to the east, the Interstate 10 freeway to the south, and Flower Street to the west, as depicted in Figure 2 below.

Figure 2: Aerial View of the Project Site

Land Use Designation and Zoning

The Downtown Community Plan presently designates the Project Site for Transit Core land uses. The Project Site is zoned C2-2D-O (Commercial Zone, Height District 2 with "D" Development Limitations, Oil Drilling District)[2]. The Transit Core land use designation and C2 Zone permit a wide variety of commercial service, office, and retail uses, as well as residential uses. Height District 2 in conjunction with the C2 Zone does not impose a height limit. The "D" Development Limitations established under Ordinance No. 164,307 (effective January 30, 1989) limit FAR on the Project Site to 3:1, subject to permissible increases through the Transfer of Floor Area Rights (TFAR) process. The "O" Oil Drilling District prescribes additional regulations governing oil drilling activities (of which there are none existing on the Project Site or proposed as a part of the Project).

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[1] The Project Site was formerly located within the Central City Community Plan, which was superseded by the Downtown Community Plan on February 6, 2025.

[2] The Project was deemed complete on July 10, 2018 and is vested under the zoning regulations in effect at that time. Therefore, the new [HB3-G1-5][CX3-FA][CPIO-O] zoning designation, including the Downtown Community Plan Implementation Overlay (CPIO), does not apply.

Project Site Characteristics

The Project Site currently consists of a total of 75,503 square feet (approximately 1.7 acres) of lot area before dedications (and will comprise 68,863 square feet or approximately 1.6 acres after dedications). The property is relatively flat and currently has approximately 325 feet of frontage along the southern side of Venice Boulevard, approximately 222 feet of frontage along the western side of Hope Street, and approximately 206 feet of frontage along the eastern side of Flower Street. The Metro A and E light-rail line tracks directly abut the Project Site to the west, running at-grade along Flower Street. The Project Site abuts a public alley to the south, which runs easterly from Flower Street, and terminates halfway through the Project Site. South of the public alley is the elevated Interstate 10 freeway, with at-grade surface parking below.

The Project Site is currently developed with four one- and two-story commercial buildings containing a mix of commercial uses, including retail, a church, and event rental space, as depicted in Figure 3 below. A private drive aisle bisects the property, running north-south from Venice Boulevard to the public alley to the rear/south.

The Project Site is located within a Metro Right-Of-Way (ROW) Project Area, a Transit Priority Area in the City of Los Angeles, a 500-Year Flood Zone, and a Methane Zone, and thus would be required to comply with the applicable regulatory requirements governing construction in such areas. The Project Site is not located within a Hillside Area or Bureau of Engineering (BOE) Special Grading Area, Very High Fire Hazard Severity Zone, an Alquist-Priolo Fault Zone, area prone to Landslide or Liquefaction, Tsunami Hazard Zone, or any other special hazard zone.

There are no existing trees on the Project Site. There are seven, non-protected trees within the adjacent public ROW, which would be removed as a part of the Project. The removal of the street trees would be subject to the street tree replacement requirements of the City's Urban Forestry Division and approval by the Board of Public Works.

Figure 3: Existing View of the Project Site From Northeast Looking Southwest

Surrounding Uses

The Project Site is located in an urbanized area and generally surrounded by a variety of low- and medium-rise commercial retail, office, warehouse, and residential buildings.

North: To the north of the Project Site, across Venice Boulevard, are a one-story commercial building and the Venice Hope Park (a privately-owned open space area). These properties are zoned [HB3-G1-5][CX3-FA][CPIO-O] and designated for Transit Core land uses.

East: To the east of the Project Site, across Hope Street, is the Hope Street Margolis Family Center (an educational and health care center) and four- and six-story affordable and homeless housing buildings. These properties are zoned [HB3-G1-5][CX3-FA][CPIO-O] and designated for Transit Core land uses.

South: To the south of the Project Site, across the public alley, is the elevated Interstate 10 freeway, with at-grade surface parking below.

West: To the west of the Project Site, across Flower Street, are one-story warehouse buildings and surface parking. These properties are zoned [HB5-G1-5][CX4-FA][CPIO-O] and designated for Transit Core land uses.

Regional and Local Access

Primary regional access is provided by the Interstate 10 and 110 freeways, which intersect approximately 1,500 feet west of the Project Site. Venice Boulevard, abutting the Project Site to the north, is a major east-west arterial roadway in the area, while Figueroa Street, a major north-south arterial roadway in the area, is located one block west of the Project Site. The Project Site abuts the following public ROWs:

Streets and Circulation

Venice Boulevard, abutting the Project Site to the north, is designated as a Modified Avenue II, which requires a half-ROW width of 45 feet, including a 33-foot half-roadway and a 12-foot sidewalk. Venice Boulevard, abutting the Project Site, is currently dedicated to a half-ROW width of 30 feet, including a variable 20- to 25-foot half-roadway and a variable five- to 10-foot sidewalk. BOE is requiring a 15-foot dedication and a three-foot sidewalk easement and variable-width improvements along Venice Boulevard abutting the Project Site to complete a 45-foot-wide half-ROW.

Hope Street, abutting the Project Site to the east, is designated as a Collector Street, which requires a half-ROW width of 33 feet, including a 20-foot half-roadway and a 13-foot sidewalk. Hope Street, abutting the Project Site, is currently dedicated to a half-ROW width of 40 feet, including a 30-foot half-roadway and a 10-foot sidewalk. The street dead-ends in a cul-de-sac at the southern portion of the Project Site. BOE is not requiring any additional dedications or improvements along Hope Street abutting the Project Site.

Flower Street, abutting the Project Site to the west, is designated as a Modified Avenue I, which requires a half-ROW width of 50 feet, including a 35-foot half-roadway and a 15-foot sidewalk. Flower Street, abutting the Project Site, is currently dedicated to a half-ROW width of 45 feet, including a 30-foot half-roadway and a 15-foot sidewalk. BOE is requiring a five-foot dedication and a three-foot sidewalk easement along Flower Street abutting the Project Site to complete a 50-foot-wide half-ROW.

A Public Alley abuts the Project Site to the south and runs easterly from Flower Street, terminating halfway through the Project Site. No dedications/improvements to the alley are required.

Public Transit

The Project Site is served by several public transit lines currently provided by the Los Angeles County Metropolitan Transportation Authority (Metro), Los Angeles Department of Transportation (LADOT) Commuter Express, and LADOT Downtown Area Short Hop (DASH). Metro operates Lines 33 and 81, with stops at the intersection of Venice Boulevard and Flower Street and Venice Boulevard and Hope Street (both abutting the Project Site). Commuter Express operates express lines to destinations throughout the greater Los Angeles area with a stop at the intersection of Venice Boulevard and Flower Street. DASH Route F, which runs between the Bunker Hill neighborhood and the University of Southern California, stops at the intersection of Venice Boulevard and Figueroa Street, one block west of the Project Site. The Metro A and E light-rail line tracks also directly abut the Project Site to the west, running at-grade along Flower Street, although the Project Site is located halfway between two stops, with the Pico Station located approximately 1,300 feet north of the Project Site, and Grand/LATTC Station located approximately 1,000 feet south of the Project Site.

Bicycle Facilities

There are a limited number of existing bike lanes within the immediate Project area. The closest existing bicycle infrastructure are protected bike lanes along Flower Street, one block west of the Project Site, and unprotected but marked bike lanes along Grand Avenue and Olive Street, one and two blocks east of the Project Site, respectively.

Land Use Policies

The Project Site is located within the Downtown Community Plan, a Transit Priority Area in the City of Los Angeles, and an Oil Drilling District. The Project is also subject to the Downtown Design Guide.

Downtown Community Plan (Formerly Central City Community Plan)

The Project was deemed complete on July 10, 2018, at which time the Project Site was located within the Central City Community Plan, which designated the Project Site for Community Commercial land uses corresponding to the CR, C2, C4, RAS3, and RAS4 Zones. The Downtown Community Plan, which became effective and superseded the former Central City Community Plan on February 6, 2025, presently designates the Project Site for Transit Core land uses. Transit Core areas are envisioned as “dense centers of activity built around regional transit hubs that connect pedestrians, cyclists, and transit users to a variety of attractions. The building form is High Rise, with ground floor treatments that contribute to an enhanced and walkable streetscape. A diverse mix of office, residential, retail, cultural, and entertainment uses makes these places centers of activity around the clock. The residential density of the Transit Core is limited by floor area. In the Downtown Plan this land use designation has a max FAR range of 10.0-13.0.”

The Project Site was also located within the City Center Redevelopment Plan, which has since been dissolved by the Downtown Community Plan; as such, the Project is not subject to the provisions of the City Center Redevelopment Plan.

Transit Priority Area

In September 2013, California Governor Jerry Brown signed Senate Bill 743 (SB 743), which made several changes to CEQA for projects located in areas served by transit. Among other things, SB 743 added California Public Resources Code (PRC) Section 21099, which provides

that “aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.” PRC Section 21064.3 defines “major transit stop” as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.” The Project would be a mixed-use residential and commercial project and is proposed on an infill site, approximately 1,300 feet south of the Pico Station on the Metro A and E light-rail lines, and approximately 1,000 feet north of the Grand / LATTC Station on the Metro A light-rail line; and is, therefore, located within a Transit Priority Area.

Oil Drilling District

The “O” Oil Drilling District prescribes additional regulations governing oil drilling activities. There are no existing oil drilling activities on the Project Site, nor are any such activities proposed as a part of the Project.

Downtown Design Guide

The Project is subject to the Downtown Design Guide. The Design Guide contains standards and guidelines for sustainable design, sidewalks and setbacks, ground floor treatment, parking and access, massing and street walls, on-site open space, architectural detail, streetscape improvements and signage.

Relevant Cases

Subject Property

VTT-82213-1A: On April 3, 2025, the Advisory Agency approved Vesting Tentative Tract Map (VTTM) No. 82213 for the merger and re-subdivision of the Project Site into one ground lot and four airspace lots, and a Haul Route for the export of 52,000 cubic yards of soil, in conjunction with the Project. On April 14, 2025, this decision was appealed and is pending decision by the CPC concurrent with the subject case.

Surrounding Properties (Within 500-foot Radius)

DIR-2021-1011-TDR-TOC-SPR-WDI-VHCA: On October 15, 2021, the Director of Planning approved a Transfer of Floor Area of approximately 42,981 square feet, a Transit Oriented Communities Affordable Housing Incentive Program Review for a Tier 4 housing development project, Site Plan Review, and a Waiver of Dedication and Improvement in conjunction with the development of a new eight-story residential building with 227 units, at 1411 South Flower Street.

DIR-2017-5308-SPR: On May 22, 2018, the Director of Planning approved a Site Plan Review in conjunction with the development of a new four-story hospital expansion building, at 1401 South Grand Avenue.

DIR-2016-2476-TDR-SPR: On September 6, 2017, the Director of Planning approved a Transfer of Floor Area of approximately 23,493 square feet and a Site Plan Review in conjunction with the development of a new seven-story mixed-use residential and commercial building, at 1400 South Flower Street.

PROJECT DETAILS

The Project Site is currently developed with four one- and two-story commercial buildings fronting Venice Boulevard, Hope Street, and Flower Street; and contains a mix of commercial uses, including retail, a church, and event rental space, as well as associated surface parking areas towards the rear/south of the Project Site along the alley. An existing private drive-aisle bisects the Project Site and runs north-south connecting Venice Boulevard with the parking area and rear alley. The Project would demolish all existing improvements for the development of a new mixed-use residential and commercial development consisting of two high-rise towers. The Hotel Tower (Tower 1) would be a 22-story building with 300 hotel guest rooms and 3,120 square feet of ground floor commercial space on the ground floor; and the Residential Tower (Tower 2) would be a 23-story building with 250 residential dwelling units and 10,000 square feet of ground floor commercial space. The Project would result in a total of 452,630 square feet of floor area, and would rise to a maximum height of 260 feet (for the 23-story Residential Tower). An outdoor paseo would replace the existing private drive-aisle in approximately the same location, connecting Venice Boulevard with a proposed circular drive-aisle on the southern portion of the Project Site.

Project Design and Architecture

The Hotel Tower would be located on the western half of the Project Site and the Residential Tower would be located on the eastern half of the Project Site. An on-site drive-aisle and circular turnaround is proposed at the southeastern portion of the Project Site to provide vehicular access from Hope Street, and a publicly accessible paseo would bisect the Project Site, separating the two towers and connecting Venice Boulevard to the circular turnaround. The Project's site plan is depicted in Figure 4 below.

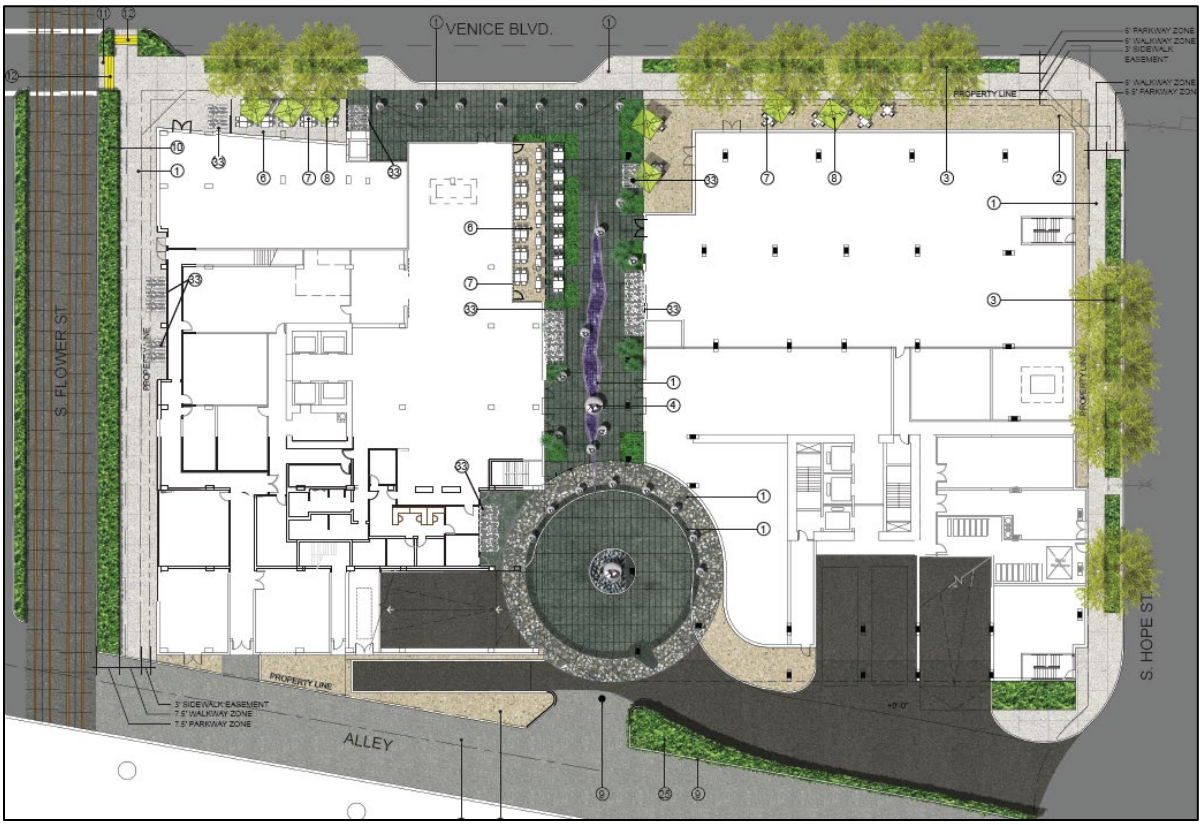


Figure 4: Project Site Plan

Each Tower would contain one basement level used for storage and mechanical equipment. At the ground level, the lobbies and commercial spaces of each tower would open up to Venice Boulevard and the paseo, which would create a primary active pedestrian corridor through the Project Site. Levels 2-4 of both buildings would consist of vehicle parking. Amenity rooms, hotel rooms, and residential units would be located on the remaining upper levels of both buildings.

The Project is modern in design, clad in flat glass and metal panels. Balconies jut out of the northern and eastern facades of the Residential Tower, and cutouts on Levels 9 and 10 of both buildings for outdoor terraces provide massing/visual relief. The aboveground parking levels would be clad in metal panels and mesh, in keeping with the design of the towers, to screen the podium levels from view from the adjacent public ROWs.

Open Space and Landscaping

The Project proposes a publicly accessible paseo which would span approximately 29 feet in width and would cover approximately 4,200 square feet, and which would be paved and landscaped with planters and decorative bollards. Outdoor seating areas are proposed along the paseo serving the ground floor commercial spaces.

Various additional common open space areas are also proposed. The Residential Tower would include an outdoor recreation deck on Level 5, outdoor terraces on Levels 9 and 10, and a rooftop terrace and pool deck on Level 23. Indoor amenity spaces would include fitness centers and recreation rooms on Level 5 and the top floor. Certain north- and east-facing units in the Residential Tower would also have private outdoor open space in the form of balconies. The Hotel Tower would include an outdoor event terrace and pool deck on Level 5, outdoor terraces on Levels 9 and 10, and an indoor fitness center on Level 5. Trees and portable landscape planters are proposed throughout all of the outdoor common open space areas. The terraces and recreation decks on Level 5 of both towers are depicted in Figure 5 below.

Figure 5: Rendering of Open Space Areas at Fifth Level

63 trees are proposed to be planted throughout the Project Site, including on the ground floor, on the Level 5 podium terraces and Level 9 terraces, the rooftops, and in the public ROW. Trees planted above the ground floor would have adequate soil depth to ensure viability.

Signage

A Sign District is proposed on the Project Site, and a proposed ordinance is provided as Exhibit D to this report. The Sign District is considered in the context of the Project's proximity to the nearby Los Angeles Sports and Entertainment District (LASED), Crypto.com Arena, and Los Angeles Convention Center along Figueroa Street, and the form and function of the immediate area as a hotel and entertainment-oriented destination. The Sign District is intended to create a unified signage theme and consistency with the surrounding commercial and civic attractions.

Los Angeles Municipal Code (LAMC) Section 13.11 allows for the establishment of Signage Supplemental Use Districts to create unique signage regulations for commercially zoned properties with a minimum lot area of either one block or three acres. The Project Site meets the minimum area requirements, as it occupies a complete City block bounded by Venice Boulevard, Hope Street, Flower Street, and the Interstate 10 freeway, and proposes a comprehensive set of signage regulations. These regulations deviate from the standard requirements of the LAMC by allowing for and regulating otherwise prohibited or limited sign types, and focuses on Supergraphic Signs and Digital Displays with on-site and off-site advertising. In general, the proposed variety and amount of signage would be comparable to other large-scale commercial, hotel, and/or entertainment developments within this area of the City.

The Supergraphic Signs and Digital Displays would architecturally integrate into the Project and overall site design; dynamically activate the public realm; provide effective wayfinding; minimize potential traffic hazards; limit light trespass onto sensitive uses; and support the economic vitality of the surrounding area for both on-site event marketing and off-site advertising revenue generation. The Sign District is intended to create a unified signage theme, and promote the unique commercial character of the development. The proposed standards of the Sign District would allow for Supergraphic and Digital Display signage; allow for revenue generation through off-site advertising; and set tailored illumination standards. Regulations would include limitations on sign area, height, design, number, illumination standards, and location, while further tailored Digital Display regulations would include illumination, refresh rates, hours of operation, and design, and a Sign Reduction Program would also be required for the installation of any off-site signage.

Most standard signage types would not be regulated by the Sign District and would be subject to Chapter 1A the LAMC. These include Awning Signs, Illuminated Canopy Signs, Marquee Signs, Monument Signs, Pedestrian Signs, Projecting Signs, Roof Signs, Wall Signs, Window Signs, Temporary Signs, Original Art Murals, and Public Art Installations. Inflatable Devices, Pole Signs, and any other signs not specifically authorized in the Sign District would be prohibited.

The Project proposes five signs (Signs 1-5), which could interchangeably either be Supergraphic Signs or Digital Display Signs, as depicted in Figure 6 below.

Figure 6: Sign Layout

Sign 1 would be located at Level 5, on the southern façade of the Hotel Tower, and would face the Interstate 10 freeway to the south of the Project Site. Sign 1 would be on an angled projecting building feature facing the Interstate 10 freeway, with an eastern face measuring 20 feet tall by 30 feet wide (equal to 600 square feet) and a southern face measuring 20 feet tall by 60 feet wide (equal 1,200 square feet), for a total sign area of 1,800 square feet.

Signs 2-5 would be located on Levels 2 and 3 of the proposed tower buildings. Signs 2 and 3 would each have two faces, located on angled projecting walls at the corners of the two proposed tower buildings (the northern and eastern facades of the Hotel Tower and northern and western façades of the Residential Tower, respectively), such that the signs would anchor the paseo from each side at the intersection of the proposed paseo and Venice Boulevard, as depicted in Figure 7 below. The northern face of Sign 2 would be eight feet tall by 16 feet wide (equal to 128 square feet), while the eastern face of Sign 2 would be eight feet tall by 30 feet wide (equal to 240 square feet), for a total sign area of 368 square feet. The northern face of Sign 3 would be eight feet tall by 50 feet wide (equal to 400 square feet), while the western face of Sign 3 would be eight feet tall by 33 feet wide (equal to 264 square feet), for a total sign area of 664 square feet. Signs 4 and 5 would face internally to the Project Site along the paseo. Sign 4 would have two faces on the eastern façade of the Hotel Tower facing east into the paseo; the northern face of Sign 4 would be eight feet tall by seven feet wide (equal to 56 square feet), while the eastern face of Sign 5 would be eight feet tall by 20 feet wide (equal to 160 square feet), for a total sign area of 216 square feet. Sign 5 would have a single face on the western façade of the Residential Tower facing west into the paseo, and would measure eight feet tall by 15 feet wide, for a total sign area of 120 square feet.

Figure 7: Rendering of Signs 2, 3, 4, and 5 From Venice Boulevard

The signs have been primarily designed to be viewed along Venice Boulevard and along the Project's paseo, as well as facing the freeway. The original proposal for the Sign District included proposed signage along Flower Street adjacent to the Metro train line ROW and at the corner of Venice Boulevard and Hope Street. These signs were removed in consideration of safety concerns along the train line, and in consideration of potential aesthetic and lighting impacts to the adjacent sensitive uses, such as Hope Street Park, the family center, and the affordable and homeless housing developments. LADOT conducted a hazard review inspection of the proposed signage program and determined that the current Sign District proposal would not result in vehicular or pedestrian safety impacts.

Sign illumination would be limited to no greater than three-foot candles above ambient lighting as measured at the property line of the nearest residentially zoned property. An initial signage illumination plan for the Digital Displays was submitted which demonstrated compliance with LAMC illumination and light trespass standards (provided as Appendix A attached to Appendix K [Lighting Technical Study] in the SCEA). Digital Display Signs would be limited to no greater than 5,000 candelas per square meter during daytime and no greater than 300 candelas per square meter during nighttime. Digital Display Signs would be permitted to have full animation along Venice Boulevard and the paseo, but limited to an eight-second refresh rate facing the freeway. Digital Displays would have permitted hours of operation from 7:00 a.m. to 12:00 a.m. midnight.

All of the proposed Supergraphic Signs and Digital Displays may display on-site content, or off-site content subject to a Sign Reduction Program. The Sign Reduction Program would require that for every square foot of off-site signage installed for Supergraphic Signs, that one square foot of legal, existing off-site signage be removed within the boundaries of Council District 14 or the Downtown Community Plan. For Digital Displays, two square feet of existing off-site signage would need to be removed for every square foot of new off-site signage. No Supergraphic Sign or Digital Display would be permitted to become operational until a Certificate of Occupancy would be issued for the new development project.

Parking

Vehicle Parking

The Project would meet the LAMC requirements for the proposed uses, after accounting for the requested Conditional Use to reduce the required amount of vehicle parking and permissible deductions for additional bicycle parking (as discussed further in the Entitlement Analysis section below). The Project would provide 283 vehicle parking spaces for the proposed uses, including eight spaces required by covenant to be reserved for the property at 1721 South Flower Street, within three above-grade parking levels contained within two parking podiums (one at the base of each proposed tower building). The Hotel Tower would contain 134 parking spaces and would include stacked/automated spaces, while the Residential Tower would contain 149 parking spaces. The Project would also install 10 percent of the total provided parking spaces with charging station (EVCS) and design an additional 20 percent of the total provided parking spaces to be designed for future EV parking (EV-ready), in compliance with the LAMC.

Bicycle Parking

The Project would provide 46 short-term and 166 long-term bicycle parking spaces. Short-term bicycle parking racks are proposed to be located throughout the Project Site, along the Venice Boulevard and Flower Street frontages, as well as along the central paseo. Long-term bicycle storage would be located on the ground floor of the Residential Tower and in the basement levels of both Towers.

Access and Circulation

Primary vehicle access to the Project would be provided off Hope Street, via a drive-aisle and circular turnaround at the rear (south) of the Project Site, which provides access to both parking podiums. The Project plans also propose a vehicle drop-off along Venice Boulevard; however, pick-up/drop-off cutouts are prohibited along the Project's street frontages according to the Downtown Design Guide. Pedestrian access to the Project would be provided at multiple points along the three street frontages, as well as along the paseo. All ground floor commercial spaces would open onto Venice Boulevard and the paseo, while the main Hotel and Residential Tower lobbies would be located along the paseo. Secondary entrances to the Towers would be located along Flower Street and Hope Street. All new driveways and access would be designed in accordance with LADOT standards.

Project Design Analysis

Citywide Design Guidelines

The Citywide Design Guidelines (Guidelines), adopted by the CPC on June 9, 2011, and last updated and adopted on October 24, 2019, establish a baseline for urban design expectations and present overarching design themes and best practices for residential, commercial, and industrial projects. Projects should either substantially comply with the Guidelines or through alternative methods to achieve the same objectives, and the Guidelines may be used as a basis to condition a project. The Guidelines focus on three main design approaches: Pedestrian-First Design, 360 Degree Design, and Climate-Adaptive Design.

<u>Pedestrian-First Design</u>

The Project would encourage pedestrian activity throughout the Project Site and in the

surrounding community by featuring highly visible, transparent, and active ground floor uses along the primary frontages and a publicly accessible paseo that bisects the Project Site, as depicted below in Figure 8. Specifically, the Project proposes active, commercial spaces along the entirety of the Venice Boulevard frontage, providing transparency at the ground level where there currently are primarily blank building walls. The Project also locates the hotel and residential lobbies as well as additional commercial entrances along the full length of the paseo. The paseo would further enhance connectivity and the pedestrian environment in the surrounding area by replacing what currently functions as a vehicular alleyway with a high-quality paved and landscaped passageway specifically designed for pedestrian access.

Vehicle parking levels are located above the ground floor and will be screened using metal panels and mesh such that parking will not be visible from the public ROW. In addition, vehicle access is located at the rear of the Project Site via a single driveway and drive-aisle, minimizing the impacts of vehicles on pedestrians.

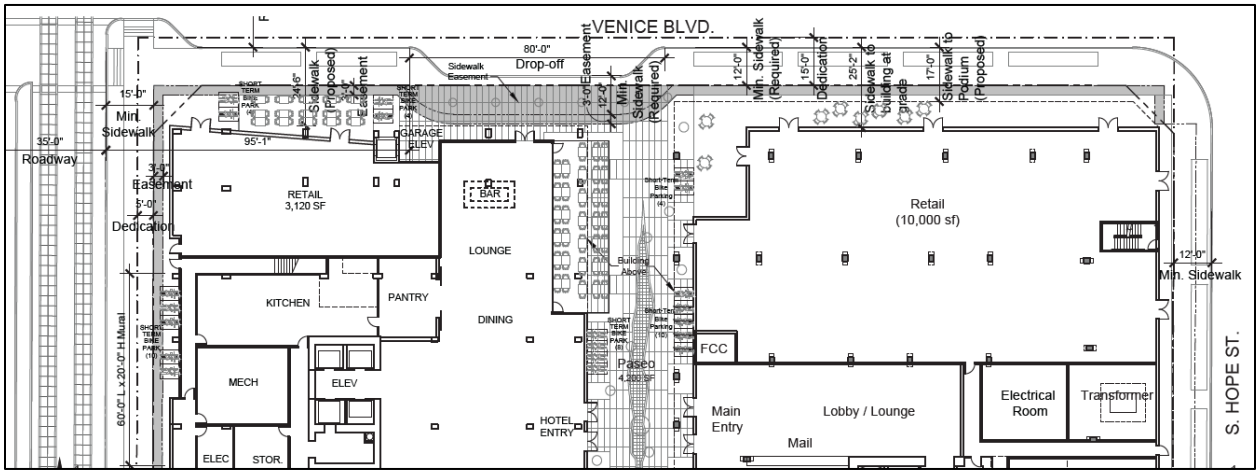


Figure 8: Portion of Ground Floor Plan

360 Degree Design

The Project's design would be compatible to the Project's location in the southern part of Downtown Los Angeles, which consists of many newer high-rise residential, commercial, and hotel developments. The building orientations and location of active uses ensure that all frontages, including the paseo, would be lined with active uses and outdoor seating areas. The buildings would be clad in metal and glass for a smooth and modern look while open terraces and balconies add variation and visual interest, similar to many other high-rise developments in the vicinity. The parking podiums have been carefully conditioned to incorporate screening elements to complement the architectural design and improve the appearance of the Project from all angles.

Climate-Adaptive Design

The Project's design would incorporate energy-efficient features, such as high performance window glazing and window frames. Additionally, the Project would comply with Title 24 of the California Administrative Code and the Los Angeles Green Building Code, among other regulatory requirements, which would mandate energy efficiency features including the use of low-flow water features, Energy Star-rated appliances, and solar energy infrastructure.

Urban Design Studio Professional Volunteer Program

The Project was presented to the Department of City Planning's Urban Design Studio and Professional Volunteer Program (PVP), which acts as a venue for City Planning staff to gather project-specific urban design advice and insight from local architecture professionals. The original Project was modified to incorporate the following features in response to the PVP comments:

- Improved activation of Hope Street and Flower Street through prominent entrances and transparency.
- Enhanced the pedestrian environment by incorporating landscaping planters and decorative hardscape throughout, and locating outdoor areas with seating along the Venice Boulevard frontage and the paseo.
- Short-term bicycle parking was relocated and dispersed throughout the street and paseo frontages to both improve convenience and activate more of the Project Site.
- The number of operable windows on the southern facades facing the freeway was minimized.

PVP also noted the proposed pick-up/drop-off cutout on Venice Boulevard is generally discouraged as it interrupts pedestrian movement. The cutout was requested as part of the related VTTM; however, it was not granted by the DAA, as the cutout would not comply with the Downtown Design Guide. Accordingly, the Project has been conditioned to prohibit the inclusion of such a design feature.

PVP also recommended avoiding freeway-facing digital signage. However, the proposed Sign District, including the proposed digital sign facing the freeway, is a significant component of the Project, and supports the form and function of the immediate area as a core commercial and entertainment hub. Therefore, the freeway facing digital display is still included in the proposed Sign District. Regulations have been incorporated into the Sign District to minimize potential impacts from the digital sign, including limitations on daytime and nighttime brightness, and refresh rate to minimize driver distractions.

Entitlement Analysis

Sign District

As previously discussed, the Project proposes a Sign District to provide a comprehensive set of sign regulations for the Project Site, and to allow for greater dimensions and typologies of signs than would otherwise be permitted. The Sign District would permit a maximum total of 3,168 square feet of off-site signage, which could be interchangeably either Supergraphic Signs or Digital Displays.

Transfer of Floor Area Rights (TFAR)

Pursuant to Article 4.5 (Sections 14.5.1-14.5.12) of the LAMC, TFAR may be permissible for projects within the Central City TFAR Area (defined by the map in Council File No. 10-1175). For projects seeking to exceed the maximum FAR permissible by the underlying zone, the Applicant may identify a Donor Site (a site from which floor area rights are transferred) and a Receiver Site (a site to which the floor area rights from the Donor Site are transferred to), as well as the amount of floor area rights to be transferred, and propose associated public benefits as required by the LAMC. The amount of public benefits required are calculated based on factors including the size of the Project Site and the amount of floor area rights transferred. In accordance with LAMC Section 14.5.5 of the LAMC, the proposal is required to be evaluated in an Early Consultation Session with the Mayor's Office, the City Council Office for the City Council in which the Receiver

Site is located in, and the Chief Legislative Analyst.

The Project Site is located within the Central City TFAR Area; and the Donor Site has been identified as the Los Angeles Convention Center (LACC) and the Receiver Site is the Project Site. Under the TFAR program, the Project qualifies as a Transit Area Mixed Use Project, which is defined as a project that: (1) provides floor area for at least two different land uses, (2) is located within 1500 feet of a fixed rail transit station, and (3) meets the standards and guidelines in the Downtown Design Guide. Transit Area Mixed Use Projects may utilize the Buildable Area, which includes the Lot Area (before dedications) plus the area between the exterior lot lines and the centerline of any abutting public right-of-way, in lieu of Lot Area for the calculation of maximum Floor Area Rights (i.e. the maximum permissible floor area for a project); however, the base permissible floor area is still calculated on the Lot Area. The Project has a Lot Area of 75,503 square feet, and the underlying C2-2D-O Zone on the Project Site permits a maximum FAR of 3:1, equal to a maximum of 226,509 square feet of floor area. The Project proposes a total of 452,630 square feet of floor area, and thus requests a transfer of 226,121 square feet of floor area from the LACC.

Under a Transfer Plan, a Public Benefit Payment is required for this transfer of floor area. The Public Benefit Payment shall equal: (1) the sale price of the Receiver Site, if it has been purchased through an unrelated third-party transaction within 18 months of the date of submission of the request for approval of the transfer, or an appraisal, if it has not; (2) divided by the Lot Area (prior to any dedications) of the Receiver Site; (3) further divided by six (equal to the High-Density Floor Area Ratio Factor); (4) multiplied by 40 percent; and (5) further multiplied by the number of square feet of Floor Area Rights to be transferred to the Receiver Site. In addition, a separate TFAR Transfer Payment is required, and when the Donor Site is owned by the City, the amount shall equal the greater of either (1) 10 percent of the Public Benefit Payment amount; or (2) five dollars multiplied by the number of square feet of Floor Area Rights to be transferred to the Receiver Site.

The Project Site was sold within 18 months of the Project application being filed, with a sale price of $11,397,000. Therefore, the Public Benefit Payment amount is calculated to be $2,275,495, and the TFAR Transfer Payment is calculated to be $1,130,605.

Pursuant to LAMC Section 14.5.9, at least 50 percent of the Public Benefit Payment must be provided as a cash payment to the Public Benefit Trust Fund, unless otherwise approved by City Council. The remaining portion of the Public Benefit Payment, if any, may be provided by direct provision to another determined public benefit. The TFAR Transfer Payment must be provided as a cash payment to the Public Benefit Trust Fund. Also pursuant to LAMC Section 14.5.9, a Public Benefit Payment shall serve a public purpose, such as: providing for affordable housing; public open space; historic preservation; recreation; cultural; community and public facilities; job training and outreach programs; affordable childcare; streetscape improvements; public arts programs; homeless services programs; or public transportation improvements.

The Project was evaluated in an Early Consultation Session in part to determine the allocation of the Public Benefit Payment. For the request herein, the Project would provide the required minimum 50 percent payment to the Public Benefit Trust Fund, and provide the remaining 50 percent of the Public Benefit Payment as direct provisions to be paid to Council District 14’s Public Benefits Trust Fund for Affordable Housing. The payment amounts are depicted in Table 1 below.

Table 1: Public Benefit Payment Transfer Plan

SOUTH PARK TOWERS PROJECT PUBLIC BENEFIT PAYMENT TRANSFER PLAN		
TFAR TRANSFER PAYMENT		
Total Payment:	**$1,130,605**	Public Benefits Trust Fund
PUBLIC BENEFIT PAYMENT		
Public Benefit Payment (Cash):	$1,137,748	Public Benefits Trust Fund
Public Benefit Payment (Direct Provision):	$1,137,747	CD 14 Affordable Housing Trust Fund
Total Payment:	**$2,275,495**	

Conditional Use Permit

The Applicant is requesting a Conditional Use Permit to allow the sale and dispensing of a full line of alcoholic beverages for on-site consumption in conjunction with the proposed hotel. Alcoholic beverage service is proposed in various dining, bar, lounge, meeting room, and outdoor areas throughout the hotel, as well as in-room dining and in minibars in each guest room. Identified areas and associated square footage and seat counts are listed below in Table 2.

Table 2: Alcoholic Beverage Service Locations

AREA	LOCATION	INDOOR / OUTDOOR	SIZE (sf)	MAXIMUM SEATS
Guestrooms	All	Indoor	N/A	N/A
Bar	Level 1	Indoor	950 sf	38
Lounge	Level 1	Indoor	950 sf	38
Dining	Level 1	Indoor	1,200 sf	65
Dining	Level 1	Outdoor	575 sf	38
Meeting	Level 5	Indoor	2,925 sf	120
Meeting	Level 5	Indoor	475 sf	24
Meeting	Level 5	Indoor	660 sf	27
Meeting	Level 5	Indoor	660 sf	27
Meeting	Level 5	Indoor	786 sf	37
Meeting	Level 5	Indoor	619 sf	27
Event Terrace	Level 5	Outdoor	5,200 sf	350
Pool Terrace	Level 5	Outdoor	4,281 sf	42
Terrace	Level 9	Outdoor	1,470 sf	10

While the hotel would operate 24 hours daily, seven days a week, hours of operation for the individual spaces within the hotel, such as the dining room and terraces, may be further limited at the discretion of the operator. Guest rooms would provide alcoholic beverage service 24 hours daily; requested hours of operation for alcoholic beverage service within all other areas are for 6:00 a.m. to 2:00 a.m. daily, the maximum allowable by the California Department of Alcoholic Beverage Control.

In addition, LAMC Section 12.24 S permits the decision-maker to grant up to a 20 percent reduction in the required amount of vehicle parking in conjunction with another Conditional Use Permit. Based on the mix of uses proposed, the Project would be required to provide 371 vehicle parking spaces, in addition to eight off-site vehicle parking spaces for the property located at 1721 South Flower Street, as required by Case No. ZA-2003-9927-CUX-PA5-1A. In conjunction with the 20 percent reduction, the Project would be required to provide 297 parking spaces. The Project also proposes to replace an amount of vehicle parking with additional bicycle parking spaces as permissible by LAMC Section 12.21 A.4 to permit the provision of 275 vehicle parking spaces for the Project, and the eight required off-site vehicle parking spaces for the property at 1721 South Flower Street, for a total of 283 parking spaces.

Site Plan Review

The Project proposes the development of 300 hotel guest rooms and, as such, is subject to Site Plan Review as the development will result in an increase of more than 50 dwelling units or guest rooms.

Director's Determination

With the number and typology of residential units proposed, the Project would be required to provide 26,925 square feet of total residential open space per the LAMC. The Applicant is requesting a 10 percent reduction (or 2,693 square feet) in the required total amount of residential usable open space (resulting in a requirement of 24,233 square feet); however, the reduction must be to the common open space only. As the Project proposes 5,050 square feet of private open space to be counted towards LAMC requirements, the Project would otherwise be required to provide 21,875 square feet of common open space without the requested 10 percent reduction, and 19,687 square feet of common open space after the requested reduction. The Project proposes 20,718 square feet of common open space and a total 25,768 square feet of open space within the Residential Tower. The Project also incorporates other open space and amenity areas which do not qualify to be counted towards the LAMC requirement, such as the 4,200 square foot ground floor paseo, and any additional square footage of balconies beyond the first 50 square feet.

Environmental Analysis

On October 1, 2024, the City Council adopted a Sustainable Communities Environmental Assessment (SCEA) No. ENV-2018-3338-SCEA, including an Erratum dated September 2024, as the Project's environmental clearance. The SCEA details the relevant environmental impacts resulting from the Project and concludes that the Project will not result in any significant environmental impacts that cannot be fully mitigated with the incorporation of mitigation measures. The Mitigation Monitoring Program includes mitigation measures to address hazardous soils and materials during grading and construction, construction noise and vibration, and operational traffic.

Public Hearing and Communications

A joint public hearing was held virtually via Zoom by the Deputy Advisory Agency and Hearing Officer on behalf of the CPC on March 5, 2025 for the Project entitlements and related VTTM and was attended by approximately 12 individuals. At the public hearing, five members of the public provided testimony, including three members of the public who voiced concerns about potential construction impacts on pedestrians, existing businesses, and surrounding properties. One speaker spoke in support of the Project, and one speaker expressed concerns regarding the Project's provision of parking spaces for a nearby property. These issues are discussed in the following section.

ISSUES

Parking Covenant

Mr. Faramarz (Fred) Yadegar, owner of the property at 1721 South Flower Street, has sent multiple communications to Planning contending that an existing entitlement case on his property and a parking agreement between his property and the Project Site requires that eight parking spaces be provided on the Project Site for use by his property. He also stated that the Project would not properly provide the eight required parking spaces because the Project would result in a modified site plan that would preclude the provision of the spaces specifically at 1616 South Flower Street, the spaces would not be provided during construction, and that the Project may not provide them at all. Condition No. 7 of Case No. ZA-2003-9927-CUX-PA5-1A, requires that off-site parking be provided within 750 feet of the 1721 South Flower Street property. The provision of these spaces is a legally binding requirement and would still apply to the Project. The Project provides the required eight parking spaces on the Project Site, which is within 750 feet of 1721 South Flower Street. Additionally the Project has been conditioned to provide parking during both construction and operation. Although the Project would modify the existing layout of buildings on the Project Site, the subject property consists of a single lot encompassing multiple street addresses, and so long as the parking spaces continue to be provided on the Project Site, the Project would satisfy the Condition of the entitlement case on 1721 South Flower Street.

This issue is further discussed in Planning's response to the appeal filed by Mr. Yadegar of the Project's VTTM, under related Case No. VTT-82213-1A, which is before the CPC for decision concurrent with the subject entitlement requests.

Sign District

Mr. Yadegar has also sent communications to Planning requesting that the Project's proposed Sign District be extended to encompass his property at 1721 South Flower Street; specifically to allow for the conversion of an existing billboard sign to a double-sided Digital Display sign with off-site advertising. However, LAMC Section 13.11 B requires that Sign Districts "shall include contiguous parcels of land which may only be separated by public streets, ways or alleys, or other physical features" However, Mr. Yadegar's property is not contiguous to the proposed Sign District site, and is separated from the Project Site by the property at 1719 South Flower Street, owned by neither Mr. Yadegar nor the Applicant, .As such 1721 South Flower Street is not considered a contiguous parcel of land and, therefore, does not meet the minimum requirement for inclusion in the Sign District.

Additionally, neither Mr. Yadegar's property nor the 1719 South Flower Street property were included in the original request and application for a proposed Sign District, and new signage on these properties was not considered in any CEQA analysis, public hearing, or in any entitlement

analysis conducted by the Planning Department. While the City Planning Commission may consider or recommend minor additions to the area proposed for rezoning for a Sign District, any boundary change must be supported by findings based on public necessity, convenience, general welfare or good zoning practice. The 1721 South Flower Street property is currently developed with a two-story building, containing an adult entertainment use (hostess dance hall) and a loan office, and with an existing 56-foot tall, off-site advertising pole sign (billboard), primarily visible from the I-10 Freeway. The 1719 South Flower Street property is currently utilized as surface parking. The digitization of an existing freeway-facing billboard sign, which does not contribute to place-making or enhance the neighborhood character, and with no architectural integration into any existing or proposed building, would not contribute to public necessity, convenience, general welfare, nor would it be good zoning practice. Therefore, Planning staff recommends that the requested properties, with signage as proposed, not be added to the Sign District.

Environmental Impacts

As demonstrated in the Project's SCEA, the Project will not have any significant impacts, including those involving construction, access, air quality, and noise, that cannot be adequately mitigated. The Project would be subject to mitigation measures and regulatory compliance measures, including the preparation of a Construction Management Plan to the satisfaction of LADOT to ensure pedestrian access to nearby properties is maintained.

In addition, GK Law and Mitchell M. Tsai Law Firm submitted comments on behalf of the Unite Here Local 11 and Western States Regional Council of Carpenters (WSRCC) labor organizations, respectively, alleging that the Project's SCEA, and particularly the air quality, noise, and Vehicle Miles Traveled (VMT) analysis, is inadequate. These comments have since been rescinded. Nonetheless, the Project's environmental consultant (Parker Environmental) has prepared detailed responses to all of the comments in the SCEA Responses to Rescinded Comments document, dated May 2025, and attached to this report as Exhibit E. Planning has also evaluated all of the comments and concludes that the SCEA appropriately analyzed the Project's environmental impacts and that all significant impacts can be adequately mitigated

Conclusion

The Project would develop 300 new hotel guest rooms, 250 residential units, and 13,120 square feet of ground floor commercial space in two new high-rise buildings in the Downtown area and in proximity to transit, thus complementing existing development and the surrounding area. The approval of the requested entitlements would enable the development of a cohesive Project that would provide a beneficial mix of uses, enhances the physical environment, and offers a variety of amenities, including open space features complementary with the surrounding neighborhood. Furthermore, the Project and the requested Sign District will enhance activity in the surrounding area and support the form and function of the neighborhood as a core entertainment and commercial destination. Based on the information submitted, the testimony received at the public hearing, the Project's environmental analysis, and the whole of the record, Planning recommends that the CPC approve the Project, as conditioned herein.

CONDITIONS OF APPROVAL

Pursuant to LAMC Sections 14.5.6, 12.24 W.1, 12.24 S, 16.05, and 12.21 G, the following conditions are hereby imposed upon the use of the subject property.

Transfer of Floor Area Conditions

1. **Floor Area**. The Project shall not exceed a total floor area of 452,630 square feet. The Transfer Payment and Public Benefit Payment shall be pro-rated to the amount of TFAR being acquired in the event the maximum amount of TFAR is not required. The lot area used to calculate the base floor area shall be 75,503 square feet with a 3:1 FAR. The buildable area of a Transit Area Mixed Use Project used to calculate the maximum floor area shall be 110,035 square feet with a 6:1 FAR. Changes to the Project that result in a 20 percent or greater decrease in floor area shall require new entitlements. The Department of City Planning reserves the right to confirm the accuracy of the requested floor area, and to verify the calculation of the Transfer Payment and Public Benefit Payment at any time prior to the issuance of the building permit, or 24 months after the final approval of the Transfer and the expiration of any appeals or appeal period or any extensions permitted by the Director in accordance with Section 14.5.11 of the LAMC.

2. **TFAR Transfer Payment.** The Project is subject to and shall pay a TFAR Transfer Payment in conformance with LAMC Sections 14.5.6 through 14.5.12. Such payment shall be based on the actual amount of floor area transferred to the Project Site.

    a. The total amount of floor area authorized to be transferred from the Los Angeles Convention Center (Donor Site) by this action shall not exceed 226,121 square feet. The total floor area of the Project Site (Receiver Site) shall not exceed 452,630 square feet.

    b. The Applicant shall provide a TFAR Transfer Payment consistent with LAMC Section 14.5.10 in the amount of five dollars per square foot of floor area transferred, equal to $1,130,605 for the transfer of 226,121 square feet from the Los Angeles Convention Center located at 1201 Figueroa St (Donor Site) to the Project Site (Receiver Site).

3. **Public Benefit Payment.** The Project is subject to and shall pay a Public Benefit Payment in conformance with LAMC Sections 14.5.6 through 14.5.12.

    a. The Applicant shall provide a Public Benefit Payment consistent with LAMC Section 14.5.9 in the amount of $2,275,495 provided that at least 50 percent ($1,137,748) of the Public Benefit Payment consists of a cash payment by the Applicant to the Public Benefit Payment Trust fund. Direct Provision payments shall be paid directly to the recipients. Proof shall be provided in the form of a cleared check or bank statement and a letter signed by the Executive Director of each organization. Consistent with the LAMC, the Project shall provide 50 percent ($1,137,747) of the Public Benefit Payment as a direct provision payment by directly providing the following public benefit:

        i. A payment to the City of Los Angeles Council District 14 Public Benefits Trust Fund for Affordable Housing in the amount of $1,137,747. The funds shall be utilized for construction and operation of affordable housing developments.

    b. At the time of issuance of the Certificate of Occupancy for the Project, the Applicant shall provide an update to the file from the recipient of direct provisions detailing how the money has been spent thus far.

c. The Applicant shall pay the required Public Benefit Payment, less the cost of the Direct Provision of Public Benefits, in cash to the Public Benefit Trust Fund, pursuant to the terms of Ordinance No. 181,574 (Article 4.5 of the LAMC). The Public Benefit Payment proof of cash payment and direct provision of public benefits is required upon the earliest occurrence of either:

i. The issuance of the building permit for the Project; or

ii. Twenty-four months after the final approval of the Project and the expiration of any appeals or appeal period.

Should the Applicant not make the required payments within the specified time, the subject approval shall expire, unless extended by the Director in writing.

4. The Project shall comply with any urban design standards and guidelines adopted by the City Planning Commission for the area, including the Downtown Design Guide, and any other applicable design guidelines.

Conditional Use Permit Conditions

5. 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 its designee to impose additional corrective Conditions, if, in their opinion, such Conditions are proven necessary for the protection of persons in the neighborhood or occupants of adjacent property.

6. **Use.** Authorized herein is the sale and dispensing of a full line of alcoholic beverages for on-site consumption only in conjunction with a proposed hotel. The grant shall be subject to the following limitations:

a. Alcoholic beverage service shall be permitted within the following areas of the hotel:

- Minibars in the 300 new guest rooms
- In-room dining (room service) in the 300 new guest rooms
- A 950 square-foot bar on Level 1
- A 950 square-foot lounge on Level 1
- A 1,200 square-foot indoor dining room on Level 1
- A 575 square-foot outdoor dining area on Level 1
- A maximum of six meeting rooms on Level 5 encompassing a total of 6,125 square feet
- A 5,200 square-foot outdoor event terrace on Level 5
- A 4,281 square-foot outdoor pool and sun terrace on Level 5
- A 1,470 square-foot outdoor terrace on Level 9

b. Seating shall be limited to the following:

- A maximum of 38 indoor seats within the bar on Level 1
- A maximum of 38 indoor seats within the lounge on Level 1
- A maximum of 65 indoor seats within the indoor dining room on Level 1
- A maximum of 38 outdoor seats within the outdoor dining area on Level 1
- A maximum of 262 total indoor seats within the six meeting rooms on Level 5
- A maximum of 350 outdoor seats within the event terrace on Level 5
- A maximum of 42 outdoor seats within the pool and sun terrace on Level 5
- A maximum of 10 outdoor seats within the terrace on Level 9

c. The number of seats shall not exceed the maximum allowable occupant load as determined by the Department of Building and Safety.

7. Hours of Operation.

a. Hours of operation for alcoholic beverage service within the following areas of the hotel shall be as follows:

- 24 hours daily for the guest rooms (in-room minibars and in-room dining [room service])

- 6:00 a.m. to 2:00 a.m. daily for all other areas designated in Condition No. 6

b. No after-hours use is permitted, except routine clean-up. This includes but is not limited to private or promotional events, special events, excluding any activities which are issued film permits by the City.

8. Security.

a. All exterior portions of the site shall be adequately illuminated in the evening so as to make discernible the faces and clothing of persons utilizing the space. Lighting shall be directed onto the site without being disruptive to persons on adjacent properties.

b. A camera surveillance system shall be installed and operating at all times to monitor the interior, entrance, exits and exterior areas, in front of and around the premises. Recordings shall be maintained for a minimum period of 30 days and are intended for use by the Los Angeles Police Department.

c. The applicant shall be responsible for monitoring both patron and employee conduct on the premises and within the parking areas under their control to assure behavior that does not adversely affect or detract from the quality of life for adjoining residents, property owners, and businesses.

d. Loitering is prohibited on or around these premises or the area under the control of the applicant. "No Loitering or Public Drinking" signs shall be posted in and outside of the subject facility.

e. At least one on-duty manager with authority over the activities within the facility shall be on the premises at all times that the facility is open for business. The on-duty manager’s responsibilities shall include the monitoring of the premises to ensure compliance with all applicable State laws, Municipal Code requirements and the conditions imposed by the Department of Alcoholic Beverage Control (ABC) and the conditional use herein. Every effort shall be undertaken in managing the facility to discourage illegal and criminal activity on the subject premises and any exterior area over which the building owner exercises control, in effort to ensure that no activities associated with such problems as narcotics sales, use or possession, gambling, prostitution, loitering, theft, vandalism or truancy occur.

9. There shall be no Adult Entertainment of any type pursuant to LAMC Section 12.70.

10. No conditional use for dancing has been requested or approved herein. Dancing is prohibited.

11. There shall be no live entertainment or amplified music on the premises. There shall be no karaoke, disc jockey, or topless entertainment.

12. Coin operated game machines, pool tables or similar game activities or equipment shall not be permitted. Official California State lottery games and machines are allowed.

13. **Good Neighbor Program.** Prior to the utilization of this grant, a telephone number and email address shall be provided for complaints or concerns from the community regarding the operation of the hotel. The phone number and email address shall be posted at the hotel lobby.

Complaints shall be responded to within 24-hours. Each tenancy shall maintain a log of all calls and emails, detailing: (1) date complaint received; (2) nature of complaint, and (3) the manner in which the complaint was resolved.

14. **STAR/LEAD/RBS Training.** Within the first six months of operation, all employees involved with the sale of alcohol shall enroll in the Los Angeles Police Department "Standardized Training for Alcohol Retailers" (STAR) or Department of Alcoholic Beverage Control "Licensee Education on Alcohol and Drugs" (LEAD) training program or the Responsible Beverage Service (RBS) Training Program. Upon completion of such training, the applicant shall request the Police Department or Department of Alcohol Beverage Control to issue a letter identifying which employees completed the training. STAR or LEAD or RBS training shall be conducted for all new hires within three months of their employment.

15. The Applicant shall be responsible for maintaining free of litter the area adjacent to the premises over which they have control, including the sidewalk in front of the Project Site.

16. The approved conditions shall be retained on the premises at all times and produced immediately upon request of the Police Department, Department of Alcoholic Beverage Control, or the Department of Building and Safety. The on-site Manager and employees shall be knowledgeable of the conditions herein.

17. An electronic age verification device shall be purchased and retained on the premises to determine the age of any individual and shall be installed on at each point-of-sales location. This device shall be maintained in operational condition and all employees shall be instructed in its use.

18. Smoking tobacco or any non-tobacco substance, including from electronic smoking devices, is prohibited in or within ten feet of the outdoor dining areas in accordance with Los Angeles Municipal Code Section 41.50 B.2.c. This prohibition applies to all outdoor areas of the project site if the outdoor area is used in conjunction with food service and/or the consumption, dispensing, or sale of either alcoholic or non-alcoholic beverages.

19. The applicant(s) and all tenancies shall comply with 6404.5(b) of the Labor Code, which prohibits smoking within any place of employment. The applicant/any tenancy shall not possess ashtrays or other receptacles used for the purpose of collecting trash or cigarettes/cigar butts within the interior of the subject establishment.

20. **Designated Driver Program.** Prior to the utilization of this grant, the operator of the hotel, and each operator of each restaurant/bar/lounge establishment if applicable, shall establish a "Designated Driver Program" which shall include, but not be limited to, signs/cards, notation on websites/social media, notifying patrons of the program, at each establishment location. The signs/cards/website/social media shall be visible to the customer and posted or printed in prominent locations or areas of each establishment. These may include

signs/cards on each table, at the entrance, at the host station, in the waiting area, at the bars, or on the bathrooms, or a statement in the menus, a website, or on social media.

21. Any music, sound or noise which is under control of the applicant shall not constitute a violation of Sections 112.06 or 116.01 of the Los Angeles Municipal Code (Citywide Noise Ordinance) and shall not be audible beyond the subject premises. At any time during the term of the grant a City inspector may visit the site during operating hours to measure the noise levels using a calibrated decibel/sound level meter. If, upon inspection, it is found that the noise level exceeds those allowed by the Citywide Noise Ordinance, the owner/operator will be notified and will be required to modify or, eliminate the source of the noise or retain an acoustical engineer to recommend, design and implement noise control measures within property such as, noise barriers, sound absorbers or buffer zones.

22. **Private Events.** Any use of any tenancy for private events, including corporate events, birthday parties, anniversary parties, weddings or other private events which are not open to the general public, shall be subject to all the same provisions and hours of operation stated herein.

23. The Applicant shall not sublet any portion of the premises to outside “promoters” for nightclub activity.

24. **MViP – Monitoring Verification and Inspection Program**. Prior to the effectuation of this grant, fees required per LAMC Section 19.01 E.3 - Monitoring of Conditional Use Permits, Inspection, and Field Compliance for Review of Operations and Section 19.04 - Miscellaneous ZA Sign Offs shall be paid to the City.

a. Within 24 months from the beginning of operations or issuance of a Certificate of Occupancy, a City inspector will conduct a site visit to assess compliance with, or violations of, any of the conditions of this grant. Observations and results of said inspection will be documented and included in the administrative file.

b. The owner and operator shall be notified of the deficiency or violation and required to correct or eliminate the deficiency or violation. Multiple or continued documented violations or Orders to Comply issued by the Department of Building and Safety which are not addressed within the time prescribed, may result in additional corrective conditions imposed by the Zoning Administrator.

25. At any time during the period of validity of this grant (authorizing the sale of alcoholic beverages), if it is determined that the new operation is not in substantial conformance with the approved floor plan, or the operation has changed in mode or character from the original approval, or if documented evidence be submitted showing a continued violation(s) of any condition(s) of this grant resulting in a disruption or interference with the peaceful enjoyment of the adjoining and neighboring properties, the City Planning Commission or their designee reserves the right to require that the owner or operator file a Plan Approval application, in association with the appropriate fees, and a 500-foot notification radius. The purpose of the plan approval will be to review the operation of the premise and establish conditions applicable to the use as conducted by the new owner or operator, consistent with the intent of the Conditions of this grant. Upon this review, the City Planning Commission or their designee may modify, add, or delete conditions, and if warranted, reserves the right to conduct this public hearing for nuisance abatement/revocation purposes.

26. **Vehicle Parking.** The Project shall be permitted a reduction of 20 percent in the required amount of vehicle parking. Prior to the issuance of a building permit, the Applicant shall update

the plans stamped Exhibit A, dated July 10, 2025, with corrected vehicle parking requirements for all proposed uses, to the satisfaction of the Department of City Planning, Major Projects.

Site Plan Review Conditions

27. Site Development. The use and development of the Project Site shall be in substantial conformance with the plans stamped Exhibit A, dated July 10, 2025. No change to the plans will be made without prior review by the Department of City Planning, Major Projects, 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 Municipal Code or the Project conditions.

28. Landscaping. Prior to the issuance of a building permit, a landscape and irrigation plan shall be submitted to the Department of City Planning for approval. The landscape plan shall be in substantial conformance with the landscape plan stamped Exhibit A, dated July 10, 2025. Minor deviations from the requirements provided below may be permitted by the Department of City Planning to permit the existing landscaping conditions provided that the plantings are well established and in good condition.

29. Parking Structures.

a. All above-grade levels of the Project's parking podium shall be consistent with the façade treatments in the plans stamped Exhibit A, dated July 10, 2025.

b. Entrances, elevators, and stairs for parking structures shall be easily accessible and highlighted architecturally.

30. Parking Covenant. The Project shall maintain eight vehicle parking spaces for the exclusive use of the property located at 1721 South Flower Street, as required by Condition No. 7 of Case No. ZA-2003-9927-CUX-PA5-1A. Additionally, the Project Site shall maintain clear signage stating that patrons of 1721 South Flower Street may park in this location, as required by Condition No. 8c of Case No. ZA-2003-9927-CUX-PA5-1A.

31. Design.

a. Along the project's ground floor façade along Venice Boulevard, the project shall incorporate no less than a total of 200 horizontal feet of transparent/glazed surfaces, such as windows and transparent doors. Along the project's ground floor façade along Hope Street, the project shall incorporate no less than a total of 75 horizontal feet of transparent/glazed surfaces, such as windows and transparent doors. Along the project's ground floor façade along Flower Street, the project shall incorporate no less than a total of 25 horizontal feet of transparent/glazed surfaces, such as windows and transparent doors. Transparent/glazed surfaces must be a minimum of four feet in height to count towards this requirement.

b. All building façades shall utilize a minimum of two different materials. Windows, doors, balcony railings, and decorative features (such as light fixtures, planters, etc.) are excluded from meeting this requirement.

c. The exterior of the proposed structure shall be constructed of materials such as, but not limited to, high-performance and/or non-reflective tinted glass (no mirror-like tints or films) and pre-cast concrete or fabricated wall surfaces to minimize glare and reflected heat.

d. Glass used in building façades shall be non-reflective or treated with a non-reflective coating in order to minimize glare from reflected sunlight.

32. Paseo. The Project shall provide a minimum 4,200 square-foot hardscaped and landscaped pedestrian paseo extending north-south through the middle of the Project Site, from Venice Boulevard to the alley, as shown in Exhibit A, July 10, 2025. The Paseo shall meet the following requirements:

a. Remain publicly accessible 24 hours a day, and gates or other barriers blocking pedestrian access through the paseo shall be prohibited. No motorized vehicles shall be permitted, except for emergency vehicles used during an emergency.

b. Incorporate one publicly accessible seat for every 200 square feet of area. Seating reserved for the use of restaurants or an outdoor dining establishment shall not count towards meeting this requirement.

c. Provide supportive amenities conducive to first-last mile connections, multi-modal transportation, and mobility hubs, including bikeshare stations, Wi-Fi, and transit information.

d. Provide signage indicating public use (i.e., containing the phrase “Open to the Public”) and also include contact information for maintenance or emergency.

e. At least 40 percent of the Paseo area shall be landscaped with planting.

f. The Paseo shall be lined with active ground floor uses (as outlined in the Downtown Design Guide) along a minimum of 50 percent of its frontage on both sides.

g. The Paseo shall be maintained in good condition by the Project operator and/or owner for the life of the Project.

33. Pick-Up/Drop-Off Zones. Pick-up/drop-off curb cutouts on the street are prohibited along the Project’s street frontages. Pick-up/drop-off shall be conducted on-site or along the street curbs only.

34. Tree Wells. The minimum depth of tree wells and planters on the rooftop, any above-grade open space, and above a subterranean structure shall be as follows:

a. Minimum depth for trees shall be 42 inches.

b. Minimum depth for shrubs shall be 30 inches.

c. Minimum depth for herbaceous plantings and ground cover shall be 18 inches.

d. Minimum depth for an extensive green roof shall be three inches.

The minimum amount of soil volume for tree wells shall be based on the size of the tree at maturity as follows:

a. 220 cubic feet for a tree 15 - 19 feet tall at maturity.

b. 400 cubic feet for a tree 20 - 24 feet tall at maturity.

c. 620 cubic feet for a medium tree or 25 - 29 feet tall at maturity.

d. 900 cubic feet for a large tree or 30 - 34 feet tall at maturity.

35. Tree Maintenance. New trees planted within the public right-of-way shall be spaced not more than an average of 30 feet on center, unless otherwise permitted by the Urban Forestry Division, Bureau of Public Works.

36. Utilities. All utilities shall be fully screened from view of any abutting properties and the public right-of-way.

37. Signage. There shall be no off-site commercial signage on construction fencing during construction.

38. Lighting. Outdoor lighting shall be designed and installed with shielding, such that the light source cannot be seen from adjacent residential properties, the public right-of-way, nor from above.

a. Areas where nighttime uses are located shall be maintained to provide sufficient illumination of the immediate environment so as to render objects or persons clearly visible for the safety of the public and emergency response personnel.

b. All pedestrian walkways, storefront entrances, and vehicular accessways shall be illuminated with lighting fixtures.

c. Light fixtures located on the Project Site (and not in the public right-of-way) shall be harmonious with the building design. Wall mounted lighting fixtures to accent and complement architectural details at night shall be installed on the building to provide illumination to pedestrians and motorists.

39. Construction Generators. The Project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices. The Project construction contractor shall use on-site electrical sources and solar generators to power equipment rather than diesel generators, where feasible.

40. Mechanical Equipment. All mechanical equipment shall be fully screened from view of any abutting properties and the public right-of-way.

41. Trash/Storage. All trash collecting and storage areas shall be located on-site and not visible from the public right-of-way. Trash receptacles shall be enclosed and/or covered at all times. Trash/recycling containers shall be locked when not in use.

42. Graffiti Removal. 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.

43. Construction Traffic Management Plan. The Applicant shall prepare a Construction Traffic Management Plan which will include a construction work site traffic control plan, DOT recommends that the construction work site traffic control plan be submitted to LADOT's Citywide Temporary Traffic Control Section or Permit Plan Review Section for review and approval prior to the start of any construction work.

44. Project Access and Circulation. The Applicant shall contact LADOT for driveway width and internal circulation requirements prior to the commencement of building or parking layout design. Driveway placement and design shall be approved by the Department of City Planning in consultation with LADOT.

45. Worksite Traffic Control Requirements. A construction work site traffic control plan shall be submitted to LADOT's Citywide Temporary Traffic Control Section or Permit Plan Review Section for review and approval prior to the start of any construction work. Refer to http://ladot.lacity.org/businesses/temporary-traffic-control-plans to determine which section to coordinate review of the work site traffic control plan. The plan should show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties.

46. Transportation Demand Management (TDM) Program. In addition to the TDM strategies cited in the Mitigation Measure of the MMP, the project shall prepare and submit a TDM program to DOT for review prior to the issuance of the first building permit for this project with a final TDM program to be approved by DOT prior to the issuance of the first certificate of occupancy for the project. The TDM program should include, but not be limited to, the following strategies:

- Implement a Neighborhood Friendly Street improvement as identified in the Mobility Plan 2035, which may include curb extensions, wayfinding signage, diverters, bicycle loop detection, shared lane markings, etc.

- Enhance the environment for bicyclists and pedestrians;

- Vehicle trip reduction incentives and services for Project employees and/or tenants;

- Onsite education and/or information on alternative transportation modes;

- Flexible/alternative work schedules and telecommuting programs;

- Incentives for using alternative travel modes such as discounted monthly transit passes, carpool and vanpool preferential load/unload areas or designated parking spaces, a "parking cash-out" subsidy, and/or unbundled parking;

- Convenient and secure bicycle storage within a bicycle locker, an attended cage, or a secure parking room;

- Bicycle parking beyond the requirement of the Bicycle Parking Ordinance No. 185,480;

- On-site lockers for employees who bicycle or use another active means of getting to work;

- Implementation of first and last mile solutions that can increase the use of transit by bridging the gap between transit stops/stations and a commuter's origin or final destination;

- Unbundled parking from the commercial leasing cost and from the housing cost;

- A one-time fixed-fee contribution of $50,000 prior to the issuance of the first certificate of occupancy for the project to the City's Bicycle Plan Trust Fund to implement bicycle improvements in the proposed project area;

- Participate and membership of a Transportation Management Organization (TMO) serving the area where the Project is located;

- Record a Covenant and Agreement to ensure that the TDM program will be maintained.

47. **LADOT Physical Improvements.** The project proposes to restripe the westbound approach of 17th Street within the existing roadway width to accommodate one shared through/left-turn lane and two through lanes on 17th Street as illustrated in Attachment 4. This would require the removal of approximately two unmetered parking spaces on 17th Street.

    The applicant shall be responsible for the cost and implementation of any necessary traffic signal equipment modifications, bus stop relocations and lost parking meter revenues associated with the proposed transportation improvement described above. All proposed street improvement and associated traffic signal work within the City of Los Angeles must be guaranteed through BOE's B-Permit process, prior to the issuance of any building permit and completed prior to the issuance of any certificate of occupancy. Prior to setting the bond amount, BOE shall require that the developer's engineer or contractor contact DOT's B-Permit Coordinator, at (213) 972-8687, to arrange a pre-design meeting to finalize the proposed design. Costs related to any relocation of bus zones and shelters, to modifying or upgrading traffic signal equipment, and that are necessary in order to implement the proposed mitigations shall be incurred by the applicant.

    If a proposed traffic mitigation measure does not receive the required approval during plan review, a substitute mitigation measure may be provided subject to the approval of LADOT or other governing agency with jurisdiction over the mitigation location, upon demonstration that the substitute measure is environmentally equivalent or superior to the original measure in mitigating the project's significant traffic impact. To the extent that a mitigation measure proves to be infeasible and no substitute mitigation is available, then a significant traffic impact would remain.

48. **Development Review Fees.** LAMC Section 19.15 identifies specific fees for traffic study review, condition clearance, and permit issuance. The Applicant shall comply with any applicable fees per this ordinance.

49. **Street Trees and Pedestrian Lighting.** Street trees and pedestrian lighting in the public right-of-way shall be selected and designed to be consistent with existing trees and lighting in the area as approved the Department Public Works – Urban Forestry Division and the Department of Cultural Affairs.

50. **Maintenance.** The subject property, including any trash storage areas, associated parking facilities, sidewalks, driveways, yard areas, parkways, and exterior walls along the property lines, shall be maintained in an attractive condition and shall be kept free of trash and debris.

Director's Determination Conditions

51. **Open Space.** The Project shall be permitted a maximum 10 percent reduction in the total required usable open space, provided that any reduction is to the common open space portion only.

Environmental Conditions

52. **Implementation**. The Mitigation Monitoring Program (MMP), attached as "Exhibit C" and part of the case file, shall be enforced throughout all phases of the Project. The Applicant shall be responsible for implementing each Project Design Features (PDF) and Mitigation Measure (MM) and shall be obligated to provide certification, as identified below, to the appropriate monitoring and enforcement agencies that each PDF and MM has been implemented. The Applicant shall maintain records demonstrating compliance with each PDF and MM. Such records shall be made available to the City upon request.

53. **Construction Monitor.** During the construction phase and prior to the issuance of building permits, the Applicant shall retain an independent Construction Monitor (either via the City or through a third-party consultant), approved by the Department of City Planning, who shall be responsible for monitoring implementation of PDFs and MMs during construction activities consistent with the monitoring phase and frequency set forth in this MMP.

The Construction Monitor shall also prepare documentation of the Applicant's compliance with the PDFs and MMs during construction every 90 days in a form satisfactory to the Department of City Planning. The documentation must be signed by the Applicant and Construction Monitor and be included as part of the Applicant's Compliance Report. The Construction Monitor shall be obligated to immediately report to the Enforcement Agency any non-compliance with the MMs and PDFs within two businesses days if the Applicant does not correct the non-compliance within a reasonable time of notification to the Applicant by the monitor or if the non-compliance is repeated. Such non-compliance shall be appropriately addressed by the Enforcement Agency.

54. **Substantial Conformance and Modification.** After review and approval of the final MMP by the Lead Agency, minor changes and modifications to the MMP are permitted, but can only be made subject to City approval. The Lead Agency, in conjunction with any appropriate agencies or departments, will determine the adequacy of any proposed change or modification. This flexibility is necessary in light of the nature of the MMP and the need to protect the environment. No changes will be permitted unless the MMP continues to satisfy the requirements of CEQA, as determined by the Lead Agency.

The Project shall be in substantial conformance with the PDFs and MMs contained in this MMP. The enforcing departments or agencies may determine substantial conformance with PDFs and MMs in the MMP in their reasonable discretion. If the department or agency cannot find substantial conformance, a PDF or MM may be modified or deleted as follows: the enforcing department or agency, or the decision maker for a subsequent discretionary project related approval finds that the modification or deletion complies with CEQA, including CEQA Guidelines Sections 15162 and 15164, which could include the preparation of an addendum or subsequent environmental clearance, if necessary, to analyze the impacts from the modifications to or deletion of the PDFs or MMs. Any addendum or subsequent CEQA clearance shall explain why the PDF or MM is no longer needed, not feasible, or the other basis for modifying or deleting the PDF or MM, and that the modification will not result in a new significant impact consistent with the requirements of CEQA. Under this process, the modification or deletion of a PDF or MM shall not, in and of itself, require a modification to any Project discretionary approval unless the Director of Planning also finds that the change to the PDF or MM results in a substantial change to the Project or the non-environmental conditions of approval.

55. **Inadvertent Discovery of Tribal Cultural Resources.** In the event that objects or artifacts that may be tribal cultural resources are encountered during the course of any Ground Disturbance Activities (demolition, excavating, digging, trenching, plowing, drilling,

tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil, potholing, pavement removal, grubbing, tree removals, boring or a similar activity at the project site), the potential tribal cultural resources shall be properly assessed and addressed pursuant to the process set forth below:

- Upon a discovery of a potential tribal cultural resource, the Applicant shall immediately stop all Ground Disturbance Activities in the immediate vicinity of the find, i.e. within a radius of 60 feet, and contact the following: (1) all California Native American tribes that are recognized by the California Native American Heritage Commission as affiliated with the area of the Project Site; (2) and the Department of City Planning.

- The applicant shall retain a qualified archaeological monitor, identified as principal personnel who must meet the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation, have a minimum of 10 years of experience as a principal investigator working with Native American archaeological sites in Southern California, and shall ensure that all other personnel associated with and hired for the archaeological monitoring are appropriately trained and qualified.

- If the archaeological monitor determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be tribal cultural resource, the Applicant shall consult with the archaeological monitor and with any tribes that respond on the recommended disposition and treatment of any Tribal Cultural Resource encountered during all Ground Disturbing Activities.

- The Applicant shall implement the tribe's recommendations if a qualified archaeologist and a culturally affiliated tribal monitor, both retained by the City and paid for by the Applicant, reasonably concludes that the tribe's recommendations are reasonable and feasible.

- The Applicant shall submit a tribal cultural resource monitoring plan to the City that includes all recommendations from the tribe that have been reviewed and determined by the qualified archaeologist to be reasonable and feasible. The Applicant shall not be allowed to recommence ground disturbance activities in the vicinity of the find (i.e. within a radius of 60 feet) until this plan is approved by the City.

- If the Applicant does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist or by the tribe, the Applicant may request mediation by a mediator agreed to by the Applicant and the City who has the requisite professional qualifications and experience to mediate such a dispute. The Applicant shall pay any costs associated with the mediation.

- The Applicant may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by the qualified archaeologist and by the tribe and determined to be reasonable and appropriate.

- Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton.

56. Inadvertent Discovery of Human Remains. In the event that human skeletal remains are encountered at the project site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, pursuant to State Health and Safety Code Section 7050.5 which requires that no further ground disturbance shall occur until the County Coroner has made the necessary findings as to the origin and disposition pursuant to California Public Resources Code Section 5097.98. In the event human skeletal remains are discovered during construction or during any ground disturbance actives, the following procedures shall be followed:

- Stop immediately and contact the County Coroner:

  1104 N. Mission Road
  Los Angeles, CA 90033
  323-343-0512 (8 a.m. to 5 p.m. Monday through Friday) or
  323-343-0714 (After Hours, Saturday, Sunday, and Holidays)

- If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC).

- The NAHC will immediately notify the person it believes to be the most likely descendent of the deceased Native American.

- The most likely descendent has 48 hours to make recommendations to the Applicant, for the treatment or disposition, with proper dignity, of the human remains and grave goods.

- If the Applicant does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.

57. Inadvertent Discovery of Archaeological Resources. In the event that any subsurface cultural resources are encountered at the project site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, pursuant to State Health and Safety Code Section 7050.5. The applicant shall notify the City and consult with a qualified archaeologist who shall evaluate the find in accordance with Federal, State, and local guidelines, including those set forth in the California Public Resources Code Section 21083.2 and shall determine the necessary findings as to the origin and disposition to assess the significance of the find. If any find is determined to be significant, appropriate avoidance measures recommended by the qualified archaeologist and approved by the Department of City Planning must be followed unless avoidance is determined to be unnecessary or infeasible by the qualified archaeologist. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted.

58. Inadvertent Discovery of Paleontological Resources. In the event that any prehistoric subsurface cultural resources are encountered at the project site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, at which time the applicant shall notify the City and consult with a qualified paleontologist to assess the significance of the find. In the case of discovery of paleontological resources, the assessment shall be done in accordance with the Society of Vertebrate Paleontology standards. If any find is determined to be significant, appropriate avoidance measures recommended by the qualified paleontologist and approved by the Department of City Planning must be followed unless avoidance is determined to be unnecessary or infeasible by the qualified paleontologist. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted.

59. Prohibition on Pile Drivers. The use of pile drivers during Project construction is prohibited.

Administrative Conditions of Approval

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

61. Code Compliance. Area, height and use regulations of the zone classification of the subject property shall be complied with, except where herein conditions are more restrictive.

62. 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 Planning Department for approval before being recorded. After recordation, a copy bearing the Recorder's number and date shall be provided to the Planning Department for attachment to the file.

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

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

65. Building Plans. Page 1 of the grants and all the conditions of approval shall be printed on the building plans submitted to the Department of City Planning and the Department of Building and Safety.

66. Project Plan Modifications. Any corrections and/or modifications to the project plans made subsequent to this grant that are deemed necessary by the Department of Building and Safety, Housing Department, or other Agency for Code compliance, and which involve a change in Site Plan, floor area, parking, building height, yards or setbacks, building separations, or lot coverage, shall require a referral of the revised plans back to the Department of City Planning for additional review and final sign-off prior to the issuance of any building permit in connection with said plans. This process may require additional review and/or action by the appropriate decision-making authority including the Director of Planning, City Planning Commission, Area Planning Commission, or Board.

67. Indemnification and Reimbursement of Litigation Costs. The Applicant shall do all of the following:

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

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

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

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

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

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

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

For purposes of this condition, the following definitions apply:

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

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

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

FINDINGS

ENTITLEMENT FINDINGS

Supplemental Use District – Sign District Findings

The South Park Towers Project (Project) proposes the construction of a new, mixed-use residential and commercial development consisting of two high-rise towers. An outdoor paseo would bisect the Project Site, running north-south between the two towers. The South Park Towers Project Sign District (Sign District) consists of five Supergraphic signs and/or Digital Displays, with a total of approximately 3,168 square feet of sign area, located along the tower facades facing the paseo and on angled projecting walls at the corners of the two towers anchoring the paseo from each side. Following are the findings for the establishment of a Supplemental Use District, as required by Los Angeles Municipal Code (LAMC) Section 12.32.

1. The action substantially conforms with the purposes, intent and provisions of the General Plan.

The Sign District is in substantial conformance with the purposes, intent, and provisions of the General Plan, including the relevant provisions of the Framework Element and Land Use Element, as explained below:

Framework Element

The General Plan Framework sets forth a citywide comprehensive long-range growth strategy and defines citywide policies regarding land use, housing, urban form, neighborhood design, open space, economic development, transportation, infrastructure, and public services. The Framework Element designates the Project area as a "Downtown Center," identified as an international center for finance and trade that serves the population of the five-county metropolitan region. Downtown Los Angeles is the largest government center in the region and the location of major cultural and entertainment facilities, hotels, professional offices, corporate headquarters, financial institutions, high-rise residential towers, and regional transportation facilities. The Downtown Center is generally characterized by a Floor Area Ratio (FAR) of up to 13:1 and high-rise buildings.

The Project is consistent with the objectives and policies of the Framework Element as described below:

Goal 3A: *A physically balanced distribution of land uses that contributes towards and facilitates the City's long-term fiscal and economic viability, revitalization of economically depressed areas, conservation of existing residential neighborhoods, equitable distribution of public resources, conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, assurance of environmental justice and a healthful living environment, and achievement of the vision for a more livable city.*

Goal 3C: *A Downtown Center as the primary economic, governmental, and social focal point of the region with an enhanced residential community.*

Objective 3.11: *Provide for the continuation and expansion of government, business, cultural, entertainment, visitor-serving, housing, industries, transportation, supporting*

uses, and similar functions at a scale and intensity that distinguishes and uniquely identifies the Downtown Center.

Goal 5A: *A livable City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and citywide scales.*

Objective 5.9: *Encourage proper design and effective use of the built environment to help increase personal safety at all times of the day.*

The Sign District would enhance and contribute to the form and function of the Downtown Center by concentrating signage along major arterial roadways and activity corridors, such as Venice Boulevard and the publicly accessible paseo bisecting the Project Site. The Sign District would create a sense of place and a lively pedestrian environment by adding vibrant signage, reinforcing the development as a Downtown destination, and contributing to Downtown as a thriving commercial, residential and visitor-serving area as well as the on-going revitalization of Downtown. The Sign District would also maximize visibility of the Project's location near the core of the City's hospitality and entertainment hub and would highlight the vibrance and vitality of the area as the location of major cultural, entertainment, and hotel facilities. The proposed mix of uses would further support the development of the Project Site and surrounding area as a dense urban core with a variety of housing, commercial, and entertainment-supporting uses.

The Sign District would provide a comprehensive set of signage regulations for the Project Site, primarily focused on creating a unique and recognizable identity through signage elements to enhance and contribute to this part of the Downtown area, draw visitors to the neighborhood, and benefit the local economy, while fostering a vibrant environment with a unified aesthetic. The Sign District would be strategically located to be compatible with and substantially in line with other sign districts and signage near the Project Site, by proposing similar signage types, including Off-Site Signs, Digital Displays, and Supergraphic Signs; and comparable hours of operation and refresh rates, creating level opportunities for commercial identification and advertising as with other sites located within the Downtown Center area.

The Sign District would ensure the signs are architecturally integrated onto the buildings. All of the proposed signs would be mounted on distinct structures protruding and angled from the buildings in the same manner, providing a consistent and coherent design. Illumination from the proposed signage would provide additional ambient lighting along the Project Site frontages and promote safety.

As discussed above, the signage would support the Project Site as a regional destination, spurring additional economic activity and supporting the existing Downtown community which continues to see investment and development; and any off-site advertising, as discussed above, would contribute to the economic vitality of the City as well as the community. As such, the Sign District would support the Downtown Center, in line with the objectives of the Framework Element.

Land Use Element (Downtown Community Plan)

The Project Site is located within the Downtown Community Plan, one of 34 Community Plans which together form the Land Use Element of the General Plan. The Downtown Community Plan designates the Project Site for Transit Core land uses. Transit Core areas are envisioned as "dense centers of activity built around regional transit hubs that connect pedestrians, cyclists, and transit users to a variety of attractions. The building form is High

Rise, with ground floor treatments that contribute to an enhanced and walkable streetscape. A diverse mix of office, residential, retail, cultural, and entertainment uses makes these places centers of activity around the clock. The residential density of the Transit Core is limited by floor area. In the Downtown Plan this land use designation has a max FAR range of 10.0-13.0." Specifically, the Sign District supports the following goal and policies of the Downtown Community Plan.

Goal LU 11: *An urban form that connects people and places and creates a walkable environment.*

> ***Policy LU 11.12:*** *Ensure that signs contribute positively to the urban fabric, complement neighborhood character, and are oriented towards pedestrians.*
>
> ***Policy LU 11.13****: Consideration of new sign districts should be limited to entertainment focused areas with regional draws.*

As with the Framework Element, the Downtown Community Plan envisions a dense urban core developed with a variety of residential, commercial, entertainment, and supporting uses in this location. The Project furthers these goals by providing a mix of residential, commercial service, and hospitality uses, all of which would be complemented by the Sign District that enhances the Project's location near the core of the City's commercial, entertainment, and hospitality hub. The area serves as a major regional draw and the Sign District would enhance that urban fabric. Therefore, the Sign District substantially conforms with the goals and policies of the Downtown Community Plan.

2. The proposed ordinance is in conformity with public necessity, convenience, general welfare, and good zoning practice.

The proposed Sign District is a single property encompassing approximately 1.6 acres in a Commercial Zone and thus meets the technical requirements for the establishment of a Sign District as defined in LAMC Section 13.11. The Sign District proposes a comprehensive sign program for the Project, primarily focused on enhancing the form and function of the surrounding area as a major urban entertainment and hospitality hub in the region, and reduce lingering blight.

The Sign District conforms to the public necessity, convenience, and general welfare of the City and reflects good zoning practice. The Project Site is located in the southern part of Downtown Los Angeles, a heavily urbanized neighborhood developed with a variety of dense urban uses. The Project Site is located one block east of the Los Angeles Convention Center and in proximity to the many entertainment and hospitality uses along Figueroa Street, such as LA Live and Crypto.com Arena, and is in close proximity to multiple transit lines and stations including the Metro A and E light-rail lines.

The Supergraphic Signs and Digital Displays would be primarily located along the tower facades facing the internal paseo and architecturally integrated into building cut-outs and on angled projecting walls at the corners of the two towers anchoring the paseo from each side. In particular, the Sign District would enhance the identity of the surrounding neighborhood by providing signs that would be architecturally integrated into the design of the building, functioning to enhance the unique character of the Project Site, and to complement the land use and urban design objectives articulated in the Downtown Community Plan. The Sign District proposes tailored signage regulations that will support economic development goals by creating an engaging visual environment in line with the form and function of the surrounding area, while promoting general welfare by minimizing any potential impacts associated with lighting and clutter. The proposed Sign District fosters

a unified aesthetic and sense of identity that complements the surrounding area while ensuring intentional placement of signage with consideration for surrounding uses. The Sign District would be strategically located to be compatible with and substantially in line with other sign districts within approximately one mile of the Project Site, including the Convention Center and Arena Sign District (Ordinance No. 188,078), the Figueroa and Pico Sign District (Ordinance No. 185,666), the Figueroa and Olympic Sign District (Ordinance No. 182,200), the Figueroa and Seventh Street Sign District (Ordinance No. 181,637), and the Historic Broadway Sign Supplemental Use District (Ordinance No. 184,056), as well as signage permitted within the Los Angeles Sports and Entertainment District (LASED)t Specific Plan, reflecting good past and present zoning practices.

In addition, the Sign District establishes criteria for signage design, standards, locations, illumination levels, and the types of permitted and prohibited signs. Appropriate and balanced sign regulations are essential to maintaining compatibility with surrounding development while fostering a vibrant urban environment. The Sign District would prohibit signs such as inflatable devices, pole signs, and any signs not specifically authorized by the Sign District or that do not comply with applicable state and federal law. Most sign types would be subject to the Chapter 1A sign standards of the LAMC. For the signs regulated by the Sign District, the Sign District prescribes assurances as to design, standards, and location for architectural integration; illumination and refresh rates to ensure minimization of light trespass on sensitive receptors; and has been reviewed by the Department of Transportation (LADOT) for hazard evaluation and determination per LAMC Section 4C.11.1.C.5, and will not pose a safety hazard.

The Sign District also includes a Sign Reduction Program aimed at reducing visual blight by requiring the removal of existing, legally permitted off-site signs (including nonconforming off-site signs) within the boundaries of Council District 14 or the Downtown Community Plan area, at a 2:1 ratio for every square foot of new Digital Displays with off-site advertising and a 1:1 ratio for every square foot of new Supergraphics with off-site advertising. As such, the Sign District would support zoning policies to enhance the physical appearance of the community. As such, the Sign District supports public necessity, convenience, general welfare, and good zoning practice.

Transfer of Floor Area Rights Findings

Following are the findings for a Transfer of Floor Area (TFAR) for Projects involving a Transfer on a Receiver Site within the Central City TFAR Area which is not located within the City Center Redevelopment Project Area[3], as required by LAMC Section 14.5.6 A.2.

3. The increase in Floor Area generated by the proposed Transfer is appropriate with respect to location and access to public transit and other modes of transportation, compatible with other existing and proposed developments and the City's supporting infrastructure, or otherwise appropriate for the long-term development of the Central City.

The Project proposes the construction of a new, mixed-use residential and commercial development consisting of two high-rise towers. Tower 1 (Hotel Tower) would be a 22-story

[3] The Downtown Community Plan has dissolved the City Center Redevelopment Plan, and therefore while the Project was previously within the Redevelopment Plan area, the Project is no longer subject to the provisions of the City Center Redevelopment Plan, and therefore for the purposes of the Findings, is subject to the Findings for projects not located within a Redevelopment Plan.

building with 300 hotel guest rooms and 3,120 square feet of ground floor commercial space, and Tower 2 (Residential Tower) would be a 23-story building with 250 residential dwelling units and 10,000 square feet of ground floor commercial space. The Project would result in a total of 452,630 square feet of floor area.

The Project Site is located in the southern part of Downtown Los Angeles, bounded by Venice Boulevard to the north, Hope Street to the east, the Interstate 10 freeway to the south, and Flower Street to the west. Surrounding development includes low-rise commercial and warehouse buildings and four- and six-story affordable housing buildings directly abutting the Project Site, and larger mid- and high-rise residential and hotel buildings farther to the north and west.

The Project Site is well-served by existing infrastructure, as the area is currently developed with a mix of high density uses in the surrounding area, as well as by public transit, including both rail and bus service. Metro operates Lines 33 and 81, with stops at the intersection of Venice Boulevard and Flower Street, and Venice Boulevard and Hope Street (both intersections which abut the Project Site). Commuter Express operates express lines to destinations throughout the greater Los Angeles area with a stop at the intersection of Venice Boulevard and Flower Street. Downtown Area Short Hop (DASH) Route F, which runs between the Bunker Hill neighborhood and the University of Southern California, stops at the intersection of Venice Boulevard and Figueroa Street, one block west of the Project Site. The Metro A and E light-rail line tracks also directly abut the Project Site to the west, running at-grade along Flower Street, although the Project Site is located halfway between two stops, with the Pico Station located approximately 1,300 feet north of the Project Site, and the Grand / LATTC Station located approximately 1,000 feet south of the Project Site. In addition to available public transit, regional access to the Site is also provided by the Interstate 10 and 110 freeways, which intersect approximately 1,500 feet west of the Project Site. Venice Boulevard, abutting the Project Site to the north, is a major east-west arterial roadway in the area, while Figueroa Street, a major north-south arterial roadway in the area, is located one block west of the Project Site.

The Applicant has requested a transfer of 226,121 square feet of floor area from the Los Angeles Convention Center (Donor Site), located at 1201 South Figueroa Street, to permit a maximum of 452,630 square feet of floor area on the Project Site (Receiver Site). The Transfer is appropriate for the long-term development of the Central City because it will result in the development of a high-rise residential and hotel project that would be similar in form to other developments in this part of the City and would further contribute to the function of Downtown as a densely-developed, high-rise urban core. The Project is located in close proximity to many similar and compatible high-rise residential, hotel, and commercial developments, such as those near the Los Angeles Convention Center and along Figueroa Street. The Project would contribute to the Downtown economy by creating job, increase City tax revenue generation, support the continued evolution of Downtown into a “24-hour community” by adding residential units, and serving as a link and catalyst for other development in the area. As such, the Project is centrally located and near transit, would be compatible with its densely developed surroundings and the City’s supporting utility infrastructure, and would be in close proximity to jobs, housing, and a wide range of uses and public services. Therefore, the proposed Transfer will be appropriate for the Receiver Site.

4. The Transfer serves the public interest.

As part of the Transfer Plan, a Public Benefit Payment is required and must serve a public purpose, such as: providing for affordable housing; public open space; historic preservation; recreational; cultural; community and public facilities; job training and outreach programs;

affordable child care; streetscape improvements; public arts programs; homeless services programs; or public transportation improvements. The Transfer serves the public interest by facilitating a project that will contribute to the sustained economic vitality of the Downtown area, and by contributing a total Public Benefit Payment of $2,275,495 (based on a formula that includes the Transfer of 226,121 square feet) and a TFAR Transfer Payment of $1,130,605 (based on the Transfer of 226,121 square feet multiplied by $5 per square foot transferred), in accordance with LAMC Section 14.5.10, as depicted in the table below. The Public Benefit Payment consists of a 50 percent payment of $1,137,748 to the Public Benefit Payment Trust Fund, and a 50 percent payment of $1,137,747 for public benefits to be directly provided by the Applicant to the CD 14 Affordable Housing Trust Fund. As such, the Transfer of Floor Area serves the public benefit interest as it complies with the specific requirement for the transfer to occur.

SOUTH PARK TOWERS PROJECT PUBLIC BENEFIT PAYMENT TRANSFER PLAN		
TFAR TRANSFER PAYMENT		
Total Payment:	**$1,130,605**	Public Benefits Trust Fund
PUBLIC BENEFIT PAYMENT		
Public Benefit Payment (Cash):	$1,137,748	Public Benefits Trust Fund
Public Benefit Payment (Direct Provision):	$1,137,747	CD 14 Affordable Housing Trust Fund
Total Payment:	**$2,275,495**	

5. The Transfer is in conformance with the Community Plan and any other relevant policy documents previously adopted by the Commission or the City Council.

The Downtown Community Plan presently designates the Project Site for Transit Core land uses. The Project Site is vested in the C2-2D-O Zone (Commercial Zone, Height District 2 with "D" Development Limitations, Oil Drilling District)[4]. The "D" Development Limitations established under Ordinance No. 164,307 (effective January 30, 1989) limit FAR on the Project Site to 3:1, subject to permissible increases through the TFAR process. The requested Transfer will reallocate 226,121 square feet of floor area from the Los Angeles Convention Center to the Project Site.

The Transfer is consistent with the Downtown Community Plan, which envisions high-rise developments with unlimited height and density and maximum FAR range of 10:1-13:1 on sites with the Transit Core land use designation. The Project further supports the following goals and policies of the Downtown Community Plan:

Goal LU 1: *A sustainable, innovative, and diversified downtown for all that offers a full range of opportunities and experiences.*

[4] The Project was deemed complete on July 10, 2018 and is vested under the zoning regulations in effect at that time. Therefore, the new [HB3-G1-5][CX3-FA][CPIO-O] zoning designation, including the Downtown Community Plan Implementation Overlay (CPIO), does not apply.

Policy LU 1.1: *Ensure the development of complete neighborhoods with diverse uses and resilient infrastructure, parks, streetscapes, transit, and community amenities.*

Goal LU 2: *Housing production and preservation through public and private action that results in a housing supply to meet projected growth in a manner that is safe, livable, and affordable to a full range of income levels; reinforces the character of neighborhoods; and add to the vitality of downtown.*

Goal LU 4: *A diversity of housing options that supports the co-location of housing with a range of uses.*

Policy LU 4.1: *Balance housing and employment uses to encourage vibrancy and reinforce Downtown as a community, as well as a destination.*

Policy LU 4.3: *Promote shared on-site amenities, including usable open space in new development projects.*

Goal LU 6: *A broad-based economy that leverages downtown's central location, land use mix, and infrastructure to foster a diversity of industry sectors and business sizes.*

Policy LU 6.1: *Promote Downtown as the primary regional center for employment by dedicating and prioritizing space for jobs across a variety of enterprises.*

Policy LU 6.3: *Make Downtown economically competitive through improvements to the public realm.*

Policy LU 6.4: *Support efforts to expand Convention Center business and position the City to host world class events like the Olympic Games.*

Goal LU 19: *Dense centers of employment, housing, and entertainment uses with the highest intensity of development, well-served by a convergence of multiple transit lines.*

Policy LU 19.2: *Ensure a vibrant mixture of land uses, including office, hotel, retail, residential, cultural, and entertainment, that together reinforce Downtown as the primary center of urban activity in the Southern California region.*

Policy LU 19.3: *Encourage the redevelopment of underutilized buildings and properties to accommodate demand for housing and jobs that contribute to a vibrant Downtown.*

Goal LU 20: *The primary economic, social, and cultural focal point of Los Angeles that serves the region, state, nation, and world. A center for innovation and a desirable place for businesses and institutions to locate.*

Policy LU 20.2: *Prioritize space for employment, retail, and entertainment uses, supported by an enhanced public realm, to attract and sustain workers.*

Policy LU 20.6: *Facilitate the development of hospitality serving uses, such as hotels, near cultural, entertainment, and institutional centers with a regional draw, and in close proximity to transit.*

The Project Site is located in the southern part of Downtown Los Angeles, a heavily urbanized neighborhood developed with some of the highest intensities of employment, housing, and entertainment uses in the City. The Project Site is located one block east of

the Los Angeles Convention Center and many entertainment and hospitality uses along Figueroa Street, and is in close proximity to multiple transit lines and stations including the Metro A and E light-rail lines. Within less than one mile of the Project Site are major destinations such as the Los Angeles Convention Center, the Crypto.com Arena, the Peacock Theater, and LA LIVE, as well as several newer, high-rise residential and commercial developments. As such, the Project Site is well-positioned for high-density development that would maximize the form and function of the surrounding area as a major activity center, employment hub, and entertainment destination in the region.

The Project Site is currently developed with low-rise commercial buildings and surface parking, which the Project would demolish for the construction of a new mixed-use residential and commercial development consisting of two high-rise towers, including a 22-story Hotel Tower with 300 guest rooms and 3,120 square feet of ground floor commercial space, and a 23-story Residential Tower with 250 dwelling units and 10,000 square feet of ground floor commercial space that would complement the existing concentration of high-rise high-intensity residential and commercial developments in Downtown Los Angeles. In addition, the Project would collocate residential units, hotel guest rooms, and commercial services, thereby providing housing, jobs, and services on the same site. These uses would complement similar uses in the surrounding area, provide a range of uses for the community, and create a balance between housing and employment uses.

The Project would also add housing with a variety of housing unit typologies, including studio, one-bedroom, two-bedroom, and three-bedroom units to a site where there currently is none, thereby serving a diverse range of the community and supporting the transformation of Downtown Los Angeles into a “24-hour” neighborhood. The Project would also provide space for services and amenities for residents and visitors alike, most notably a paseo that would connect the two towers and serve as a functional and inviting shared amenity. The paseo would include landscaped planters, decorative paving, outdoor seating, and short-term bicycle parking, enhancing connectivity between the buildings and contributing to the overall design of the Project and urban form of the community. As such, the Project would support the housing production goals of the Downtown Community Plan by providing a diverse range of residential unit typologies, while also creating employment and service uses to support the development of a holistic community.

The Project would also support the role of Downtown Los Angeles as the primary regional center in the City by adding 300 hotel guest rooms in support of the many nearby economic and entertainment draws. The hotel would further support the City’s efforts to attract conventions, increased business, and to host the Olympics in 2028 by providing more guest rooms to accommodate such functions.

In addition, the Project would implement improvements to the adjacent public rights-of-way, including the installation of new sidewalks, street lighting, and street trees, which would create a safer, more attractive, and engaging pedestrian environment and enrich the quality of the public realm. Such improvements would enhance walkability and access to nearby destinations and transit and contribute to a vibrant, high-density urban environment. As such, the Project would advance goals of making Downtown Los Angeles economically competitive by creating job-generating uses that support the function of Downtown as a tourist, business, and entertainment hub, and by contributing to public realm improvements that support a thriving and accessible urban environment.

Goal LU 10: *Development patterns that create a connected and seamless experience while reinforcing the identity of Downtown’s special places.*

Policy LU 10.1: *Strategically concentrate the highest densities and intensities within the Plan area to respond to historic development patterns and match infrastructure investment.*

Policy LU 10.2: *Reinforce the distinct qualities of each neighborhood, and ensure that growth complements and is compatible with existing character and historic resources; and supports community needs.*

Policy LU 10.4: *Support infill development that responds and contributes to neighborhood character.*

The Transit Core land use designation envisions some of the highest development intensities in the City, with unlimited height and density and maximum FARs of 10:1 to 13:1. The Project would redevelop existing low-rise commercial buildings and surface parking with a new, mixed-use residential and commercial development consisting of two high-rise towers. The Project would both be compatible with various other high-rise developments in the area and support goals of further developing this neighborhood's character as a tall and dense urban core.

Goal LU 11: *An urban form that connects people and places and creates a walkable environment.*

Policy LU 11.1: *Require active ground floors and street frontages that improve walkability and connectivity, especially between transit stations and nearby destinations.*

Policy LU 11.2: *Encourage development that is well integrated with the public realm to create an inviting urban environment.*

Policy LU 11.3: *Incentivize the inclusion of paseos through large sites to improve pedestrian access.*

Policy LU 11.4: *Encourage building design that connects and orients people toward destinations and activity centers.*

Goal LU 22: *Distinctly urban neighborhoods that have the highest levels of pedestrian activity, well-designed buildings that meet the sky to create an interesting skyline, and ground floors that meet the street to contribute to a vibrant public realm.*

Policy LU 22.1: *Encourage well-designed, intensive development that contributes to a safe and inviting pedestrian realm and includes substantial benefits that reinforce Downtown's character and enhance livability.*

Policy LU 22.2: *Foster and reinforce a cohesive, pedestrian-friendly, and inviting streetscapes that promote walking, bicycling, and transit use. Encourage the creative infill of landscaped setbacks and inoperative spaces, such as those resulting from inconsistent streetwalls.*

Policy LU 22.5: *Promote the activation of ground floors of buildings and public plazas with enlivening uses such as kiosks and shops to create a lively urban environment and seamless interaction between private open space and sidewalks.*

Policy LU 22.6: *Encourage new developments to contribute to the pedestrian and open space network with publicly accessible plazas and paseos. Design these spaces with appropriate shade and landscaping.*

Policy LU 22.11: *Seek opportunities to adapt alleys into sustainable, safe, inviting, and vibrant spaces that function as publicly accessible open space and pedestrian paths of travel, while accommodating necessary vehicular and loading functions.*

The Project Site is currently developed with low-rise commercial buildings, surface parking, and a private alleyway, all with minimal street-level activation and which serve to create a stark pedestrian environment. The Project would significantly improve the physical environment and pedestrian experience on the Project Site and in the immediate vicinity by providing wider sidewalks, landscaping, and commercial storefronts along Venice Boulevard as the primary street frontage, thereby activating the streetscape, creating a lively urban environment, and facilitating movement to and along the Project Site. In addition, a publicly accessible paseo would replace the existing private alley in approximately the same place, turning a vehicle driveway into a pedestrian pathway featuring landscaped planters, decorative paving, outdoor seating, and short-term bicycle parking. With commercial storefronts and a comprehensive signage program (as previously discussed in Finding Nos. 1 and 2) oriented along the paseo and framing the corners of the two towers at the intersection of Venice Boulevard, the Project would draw pedestrians in to the Project Site and enhance movement in the area.

The Project would also support access for all modes of travel, including by vehicle, pedestrian, and bicycle by purposefully locating short-term bicycle parking throughout the Project Site along the primary street frontages, the paseo, and in front of the ground floor commercial spaces, to increase convenience and useability. Therefore, the Project fosters a cohesive environment and streetscape that is conducive and attractive to all modes of transit.

Goal PO 1: *A well maintained, accessible, and highly utilized open space system and public realm network that serves the growing population of Downtown residents, workers, and visitors.*

Policy PO 1.3: *Support the creation of different open space typologies, such as parklets, dog parks, and other facilities, to serve a variety of users and needs.*

Goal LU 18: *Legible and comfortable spaces to engage in physical activity, experience nature, and find respite.*

Policy LU 18.1: *Promote a pedestrian environment that enhances thermal and visual comfort and provides opportunities for resting and socializing.*

Policy LU 18.4: *Provide space for recreational facilities for the health and enjoyment of Downtown workers, residents, and visitors.*

The paseo would provide over 4,200 square feet of publicly accessible open space and would provide landscaped planters, decorative paving, outdoor seating, and short-term bicycle parking, which would provide a variety of amenities and serve a range of users. In addition, the Project would provide usable open space and amenity areas for residents and hotel guests, including indoor lounge and fitness rooms and outdoor terraces and pool decks, across both towers which would recreation amenities for workers, residents, and visitors alike. While the paseo would be privately maintained, as conditioned, it shall remain publicly accessible at all times. As such, the Project would support goals to provide and maintain open space in the Downtown area.

Downtown Design Guide

In addition, as part of the TFAR entitlement, the Project is subject to the Downtown Design Guide, which was adopted by the City Planning Commission on June 8, 2017. The Downtown Design Guide supplements the City's General Plan and helps shape well-designed projects by setting forth standards and guidelines for sustainable design, sidewalks and setbacks, ground floor treatment, parking and access, massing and street wall, on-site open space, architectural detail, streetscape improvement, and signage prepared at a finer grain specifically for the Downtown neighborhood districts; and encourages Downtown Los Angeles to develop as a more sustainable community with an emphasis on walkability and the making of great streets, districts and neighborhoods. The Downtown Design Guide also focuses on the relationship of the buildings to the street, including sidewalk treatment, the character of the building as it adjoins the sidewalk and connections to transit.

The Project meets several of the Design Guide standards and guidelines by providing visual articulation and variation to enrich the pedestrian experience and contribute to the quality of the streetscape that help define the pedestrian environment at the street level. The Project would activate street frontages, especially Venice Boulevard as the primary frontage, with ground floor commercial storefronts with extensive glazing to activate the streetscape. The Project would also improve the public right-of-way by widening the sidewalk and creating a publicly accessible paseo with enhanced paving and decorative features, creating an inviting experience for all pedestrians and drawing pedestrians into the Project Site. The paseo would further serve to reduce massing and building length on the Project Site.

Additionally, the Project would be appropriately scaled and consistent with similar developments in the vicinity. While the Project Site is generally surrounded by low- and mid-rise buildings, this part of Downtown continues to experience rapid growth with the introduction of taller buildings with a variety of residential, commercial service, and hotel uses being introduced within an area previously concentrated with low-scale commercial uses. With a maximum height of 23 stories and 260 feet, the Project would be similar in scale to, or shorter than, other high-rise developments nearby, including the 37-story Moxy and AC Hotel tower and the 43-story Hope + Flower apartment towers, one block north of the Project Site. Furthermore, the Hotel and Residential Towers have been designed to ensure adequate spacing between each tower and between the Project Site and adjacent properties. Specifically, the two towers are oriented to be offset and designed such that both towers have outdoor podium decks on Level 5; above Level 5, the Hotel Tower rises above the western portion of its podium and leaves the eastern portion open to the sky, while the Residential Tower rises above the southern portion of its podium and leaves the northern portion open to the sky, resulting in an effective separation of over 90 feet between the two towers. As such, the Project creates both internal setbacks between the two towers as well as external setbacks above the ground floor, which serve to improve the Project's useability and compatibility with surrounding properties.

Section 4.C of the Downtown Design Guide requires that at least 75 percent of all street frontages (not designated as Retail Streets) be lined with active uses or residential units with street-facing entrances. The intent of this design requirement is to activate primary corridors with glazing and transparency associated with active uses to enhance the streetscape and pedestrian environment. Although the Project does not meet this requirement along Flower Street and Hope Street, immediately abutting the Project Site, Flower Street is lined with light-rail tracks, while Hope Street terminates against the Interstate 10 freeway; as a result, neither frontage serves to facilitate pedestrian movement throughout the broader neighborhood, nor are they conducive to active or residential uses at the street level. However, the Project does meet this requirement along the proposed

paseo, which is lined with commercial storefronts and the primary hotel and residential lobbies. The paseo functions as a primary activity corridor for the Project, while Hope Street and Flower Street serve "back-of-house" functions; nevertheless, both Hope Street and Flower Street would still feature building entrances and an amount of activation with commercial storefronts at the intersections with Venice Boulevard (and have been conditioned as such). As such the Project substantially meets the intent of this design requirement to activate the ground level of the Project Site.

The Project, as proposed, substantially complies with all other applicable standards in the Downtown Design Guide. Therefore, based on the above, the Project substantially supports the relevant goals of the Downtown Community Plan, as well as the Downtown Design Guidelines, and is consistent with the Community Plan and other applicable policy plans.

Conditional Use (On-Site Alcohol Sales and Reduced Parking) Findings

Following are the findings for a Conditional Use Permit to permit the sale and dispensing of a full-line of alcoholic beverages for on-site consumption within the proposed hotel, and to allow a 20 percent reduction in the required amount of vehicle parking, as required by LAMC Sections 12.24 E, 12.24 W.1, and 12.24 S.

6. The project will enhance the built environment in the surrounding neighborhood or will perform a function or provide a service that is essential or beneficial to the community, city or region.

The Project proposes the construction of a new mixed-use residential and commercial development which includes a 22-story hotel building with 300 hotel guest rooms. The Applicant requests a Conditional Use Permit for the sale and dispensing of a full-line of alcoholic beverages for on-site consumption within the proposed hotel to allow for alcoholic beverage service within the hotel guest rooms in the form of in-room minibars and in-room dining (room service), a bar and lounge by the lobby, a dining room and associated outdoor dining area on the ground floor, meeting rooms, outdoor terrace areas and pool deck on Level 5, and an outdoor terrace on Level 9.

The sale and dispensing of alcoholic beverages in conjunction with the proposed hotel would provide a service that is beneficial to the community by adding to the number of available dining venues and entertainment establishments offering food and alcohol in conjunction with the proposed use. The request would support the development of the proposed hotel and Project as a whole, which will improve the site with a new and modern development with enhanced landscaping, physical improvements, and activity-generating uses compared to the existing improvements on the site. Patrons would be drawn to the area due to the lodging, entertainment, and dining options available, and offering a full range of alcoholic beverages within the hotel portion of the Project would enhance the experience for visitors, employees, and residents nearby. The Project would also increase the economic vitality of the area by developing a new hotel use, maximizing its location within a Transit Priority Area and in proximity to the Los Angeles Convention Center and the Los Angeles Sports and Entertainment District (LASED), thereby supporting the form and function of the surrounding area as a major activity center, employment hub, and entertainment destination in the region. The ability to offer a full line of alcoholic beverages would also allow the hotel to remain competitive with similar uses in the area, as alcohol service is commonly expected by patrons as a part of such uses.

In addition, the request for reduced vehicle parking is appropriate in this location because the Project Site is located in a heavily urbanized commercial core in close proximity to a variety of transit options, including multiple bus lines and light-rail stations within one-quarter

mile of the Project Site. In such a location, the request would enable the provision of services and amenities in a dense high-rise development without overburdening the Project to provide more vehicle parking than is necessary.

Thus, the sale and dispensing of a full line of alcoholic beverages, and request for a 20 percent parking reduction, in this location will both provide a valuable community service and enhance the physical environment.

7. The project's location, size, height, and operations and other significant features will be compatible with and will not adversely affect of further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare, and safety.

The Project Site is currently developed with four low-rise commercial and warehouse buildings and associated surface parking and alley areas. The Project proposes the demolition of all existing improvements for the construction of a new mixed-use residential and commercial development consisting of two high-rise towers. Tower 1 (Hotel Tower) would be a 22-story building with 300 hotel guest rooms and 3,120 square feet of ground floor commercial space on the ground floor; and Tower 2 (Residential Tower) would be a 23-story building with 250 residential dwelling units and 10,000 square feet of ground floor commercial space on the ground floor. The Project would result in a total of 452,630 square feet of floor area, and a maximum height of 260 feet (for the 23-story Residential Tower).

The Applicant requests a Conditional Use Permit for the sale and dispensing of a full-line of alcoholic beverages for on-site consumption within the proposed hotel. Alcoholic beverage service is proposed within the hotel guest rooms in the form of in-room minibars and in-room dining (room service), a bar and lounge by the lobby, a dining room and associated outdoor dining area on the ground floor, meeting rooms, outdoor terrace areas and pool deck on Level 5, and an outdoor terrace on Level 9. Proposed hours of alcoholic beverage service are 24 hours daily for the hotel guest rooms and from 6:00 a.m. to 2:00 a.m. daily for all other uses including the bar, lounge, dining areas, meeting rooms, and terraces.

The Project Site is located in the southern part of Downtown Los Angeles, bordered by Venice Boulevard to the north, Hope Street to the east, the Interstate 10 freeway to the south, and Flower Street to the west. Immediately to the west and north of the Project Site, major commercial, hotel, and entertainment uses are part of the existing Los Angeles Convention Center and LASED. The Project would introduce a new hotel with a request for a full line of alcoholic beverages and a residential tower (not part of the alcohol request), thereby supporting the form and function of the surrounding area. While the Project Site is generally surrounded by low- and mid-rise buildings, this part of Downtown continues to experience rapid growth with the introduction of taller buildings with a variety of residential, commercial service, and hotel uses being introduced within an area previously concentrated with low-scale commercial uses. With a maximum height of 23 stories and 260 feet, the Project would be similar in scale to or shorter than other high-rise developments nearby, including the 37-story Moxy and AC Hotel tower and the 43-story Hope + Flower apartment towers, one block north of the Project Site. As discussed in Finding Nos. 1, 5, and 8, the Project is located on a site designated for tall high-rise developments; as such, the Project would be consistent with the scale of development envisioned for this location and within the range of heights of existing developments in the surrounding area.

The Project would support planning goals envisioning the surrounding area as a thriving mixed-use community consisting of residential, commercial, and entertainment uses all integrated into a walkable and transit-accessible neighborhood. Moreover, the Project's hotel component is immediately adjacent to commercial uses to the north and west, as well as the Metro E and A transit lines that run along South Flower Street, thereby locating the

hotel further away from residential uses along Hope Street. Additionally, by limiting the alcohol request to on-site use only within the hotel, the alcohol service is contained and carefully regulated.

The sales of alcohol would not be detrimental to the Project's residents and nearby residential uses, as the establishments serving alcohol would be carefully controlled and monitored and are typical and expected in conjunction with hotel and ancillary restaurant uses. The proposed hours of operation for the restaurant/bar area are from 6:00 a.m. to 2:00 a.m. daily, in keeping with typical restaurant operations and other alcoholic beverage service requests commonly found throughout the City. Thus, the Project is not expected to have any significant additional adverse impacts and will be compatible with adjacent properties and the surrounding community. Nonetheless, conditions have been imposed to encourage responsible management and deter criminal activity. These conditions will ensure that the operation complies with all applicable regulations and that no aspects of the operation will adversely affect the surrounding area.

In addition, the request for reduced vehicle parking is appropriate in this location because the Project Site is located in a heavily urbanized commercial core in close proximity to a variety of transit options, including multiple bus lines and light-rail stations within one-quarter mile of the Project Site. In such a location, the request would enable the provision of services and amenities in a dense high-rise development without overburdening the Project to provide more vehicle parking than is necessary. The Project would still provide 283 vehicle parking spaces to meet the needs of the proposed uses on-site.

Therefore, as proposed and conditioned, the sale and dispensing of a full-line of alcoholic beverages and request for a 20 percent parking reduction at this location will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, of the public health, welfare, and safety and the development of the community.

8. The project substantially conforms with the purpose, intent, and provisions of the General Plan, the applicable community plan, and any specific plan.

The elements in the General Plan establish policies and provide the regulatory environment for managing the city and for addressing concerns and issues. The majority of the policies derived from the elements in the General Plan are in the form of Code Requirements, which collectively form the LAMC. The requested alcoholic beverage service is a conditionally permissible use, and thus does not propose to deviate from the requirements of the LAMC.

Pursuant to LAMC Section 12.36 D, when acting on multiple applications for a project, when appropriate, findings may be made by reference to findings made for another application involving the same Project. This finding is substantially identical to the finding found earlier in this document as Finding Nos. 1, 5, and 8 as well as Finding No. 12 below, which are hereby incorporated by reference. As discussed previously and below, the Project would be consistent with the purposes, intent and provisions of the General Plan and its applicable elements, including the Framework Element, Transportation Element, Health and Wellness Element, Air Quality Element, and the Land Use Element (Community Plan). Approval of the Project would enhance the built environment in the surrounding neighborhood and would provide a function that is fitting and compatible with the desired use of the subject property, the character of the surrounding community, and the commercial viability of the region as a whole.

The Project's proposed request for the sale and dispensing of a full line of alcoholic beverages for on-site consumption within the proposed hotel would be consistent with the Project's land use designation (Transit Core) and its associated goals and policies.

Additionally, the area surrounding the Project Site is urbanized and features a range of similar mixed commercial developments, including multi-family apartments, hotels with restaurants and bars, as well as the Los Angeles Convention Center and LASED. Alcohol sales for on-site consumption as part of the hotel in the Project would be beneficial to public convenience and welfare, as the uses are situated in an infill location that is easily accessible to nearby visitors, employees, and residents.

The ability for the Project to offer a full line of alcoholic beverages would allow the hotel and ancillary restaurant/bar uses to remain competitive with other similar establishments in the area, as alcohol service is a common and expected component of such uses, and enhance the amenities offered. This would help ensure a vibrant mixture of land uses, reinforcing Downtown as the primary center of urban activity in the region.

In addition, the request for reduced vehicle parking is appropriate in this location because the Project Site is located in a heavily urbanized commercial core in close proximity to a variety of transit options, including multiple bus lines and light-rail stations within one-quarter mile of the Project Site. In such a location, the request would enable the provision of services and amenities in a dense high-rise development without overburdening the Project to provide more vehicle parking than is necessary, consistent with City goals to encourage transit and facilitate high-density development in such designated areas.

Therefore, the sale and dispensing of a full line of alcoholic beverages for on-site consumption as part of the hotel in the Project and request for a 20 percent parking reduction would be in substantial conformance with the General Plan and Community Plan.

Additional findings required per LAMC Section 12.24 W.1 (Conditional Use for Alcoholic Beverages):

9. The proposed use will not adversely affect the welfare of the pertinent community.

The Project Site is zoned C2, which permits both commercial and residential development as well as the sale and dispensing of alcoholic beverages. The Project proposes a hotel and residential tower with ground-floor commercial uses. The request, in conjunction with the proposed hotel and its ancillary amenity spaces, will enhance the economic vitality of the surrounding community by providing additional dining, lodging, and recreational amenities.

As a hotel development with alcoholic beverage sales incidental to hotel and restaurant services, the proposed operations are unlikely to have any significant adverse impacts. The proposed hours of operation are from 6:00 a.m. to 2:00 a.m. daily, in line with typical restaurant operations and other alcoholic beverage service requests commonly found throughout the City. Alcoholic beverage service will be self-contained within designated areas on the Project Site and thus are unlikely to significantly impact adjacent properties. Furthermore, the closest commercial uses adjacent to the Project Site are located 100 to 200 feet to the west, while the nearest residential uses are approximately 300 feet southeast of the Site. As such, the Project is not expected to have any significant additional adverse impacts and will be compatible with adjacent properties and the surrounding community.

Negative impacts commonly associated with the sale of alcoholic beverages, such as criminal activity, public drunkenness, and loitering, will be mitigated by the imposition of conditions that require responsible management and deter loitering. Employees will undergo training on the sale of alcoholic beverages, including training provided by the Los Angeles Police Department's (LAPD) Standardized Training for Alcohol Retailers (STAR) Program. Additional conditions regarding excessive noise, noise prevention, and litter management will safeguard the residential community.

Therefore, as proposed and conditioned, the sale and dispensing of a full line of alcoholic beverages within the proposed hotel will not adversely affect the welfare of the pertinent community.

10. The granting of the application will not result in an undue concentration of premises for the sale or dispensing for consideration of alcoholic beverages, including beer and wine, in the area of the City involved, giving consideration to applicable State laws and to the California Department of Alcoholic Beverage Control's guidelines for undue concentration; and also giving consideration to the number and proximity of these establishments within a one thousand foot radius of the site, the crime rate in the area (especially those crimes involving public drunkenness, the illegal sale or use of narcotics, drugs or alcohol, disturbing the peace and disorderly conduct), and whether revocation or nuisance proceedings have been initiated for any use in the area.

According to the California Department of Alcoholic Beverage Control (ABC) licensing criteria, four on-site and two off-site consumption licenses are allocated to the subject census tract (Census Tract 2240.1). Currently, there are three active on-site licenses and three active off-site licenses in this census tract.

According to statistics provided by LAPD's Central Bureau, Central Division within Crime Reporting District No. 192, which has jurisdiction over the subject property, a total of 269 crimes were reported in 2024, including 144 Part I crimes and 125 Part II crimes. This is compared to the Citywide average of 89 crimes and the High Crime Reporting District average of 106 crimes for the same reporting period. Alcohol-related Part II crimes reported include DUI (1) and Miscellaneous Other Violations (16). These numbers do not reflect the total number of arrests in the subject reporting district for the year, as arrests made in the calendar year may reflect crimes reported in previous years.

Concentration can be deemed undue when the addition of a license negatively impacts a neighborhood. However, concentration is not undue when the approval of a license provides a public service and benefits the community. In active commercial areas where there is a demand for licenses beyond the allocated number, the ABC has recognized that high-activity retail and commercial centers are supported by significant employee populations, in addition to the growing resident population base in the area. The ABC has discretion to approve an application if there is evidence that normal operations will not be contrary to public welfare and will not interfere with the quiet enjoyment of property by residents.

In this case, the subject property is located is located in the southern part of Downtown Los Angeles, a heavily urbanized and densely developed commercial core anchoring various entertainment venues, hotels, and restaurants. The Project will provide new and unique services and cater to both local residents and workers, as well as tourists and visitors, offering a complementary and beneficial service in this location. Additionally, an alcohol license would not be unusual or unexpected for a proposed new hotel with ancillary dining/bar services. In addition, the Project would add a new on-site license and thus would not exceed the allocated number of licenses to the census tract.

Furthermore, the Project will not adversely affect the public welfare, as the proposed self-contained operations within a new upscale hotel with incidental alcoholic beverage service are unlikely to have a significant direct impact on the local crime rate, particularly considering the relatively low number of alcohol-related crimes in the area.

The proposed hotel and ancillary uses with alcoholic beverage service will be desirable uses in an area designated for such uses and part of a larger development, which would benefit from oversight of the building complex as a whole. The Project will provide valuable services and amenities to workers, visitors, and residents, and, as conditioned, will not negatively impact the area. Nonetheless, operational conditions have been incorporated to address noise, safety, and security, ensuring the proposed use is conducted with due regard for surrounding properties and reducing any potential crime issues or nuisance activity. Therefore, as proposed and conditioned, the sale and dispensing of a full line of alcoholic beverages within the proposed hotel will not result in undue concentration.

11. The proposed use will not detrimentally affect nearby residentially zoned communities in the area of the City involved, after giving consideration to the distance of the proposed use from residential buildings, churches, schools, hospitals, public playgrounds and other similar uses, and other establishments dispensing, for sale or other consideration, alcoholic beverages, including beer and wine.

The Project Site is zoned C2, which permits the hotel, residential, and ground-floor commercial uses proposed as part of the Project, as well as the sale and dispensing of alcoholic beverages. The following sensitive uses have been identified within 1,000 feet of the subject property:

- Multi-family residential buildings, 1600 and 1624 South Hope Street, located approximately 60 feet east (across Hope Street) from the Project Site
- LA Pilgrim Church, 1329 South Hope Street, located approximately 1,000 feet north of the Project Site
- Glory Church of Jesus Christ, 1801 South Grand Avenue, located approximately 450 feet south of the Project Site
- California Hospital Medical Center, 1401 South Grand Avenue, located approximately 250 feet north of the Project Site
- Venice Hope Park, a privately-owned open space, located approximately 230 feet north of the Project Site

Consideration has been given to the distance between the subject establishment and the above-referenced sensitive uses. The Project will not be detrimental to the surrounding neighborhood. The Project Site is located in the southern part of Downtown Los Angeles within a major entertainment center and commercial hub with a high concentration of entertainment venues, hotels, and restaurants. While residentially-zoned properties are in proximity to the Project Site, the surrounding area is considered a mixed-use neighborhood with existing residential, retail, office, and entertainment uses, and it would not be unusual for residentially-zoned properties to be located in proximity to alcohol-serving establishments.

In addition, the other sensitive uses are located farther away from the Project Site and are separated by several other properties serving as buffers from the Project. Additionally, the park across from the Project Site is a gated park with business hours, limiting its use, particularly in the evenings when alcoholic beverage service is more likely to be busier.

The sale of alcoholic beverages as part of the lobby restaurant/bar lounge and other amenity areas is a standard practice for hotels to attract and cater to their clientele and would be incidental to the Project's primary operation as a hotel with ancillary amenities. The sale of alcoholic beverages within the proposed Project would be part of a new upscale hotel, and all alcohol service in such a facility would occur within a carefully controlled environment managed by a seasoned operator.

Moreover, the Project has been conditioned to protect the health, safety, and welfare of the surrounding neighbors from potential effects of excessive noise or disruptive behavior. Operational conditions have been incorporated to address noise, safety, and security, ensuring the proposed use is conducted with due regard for surrounding properties and reducing any potential crime issues or nuisance activity. Furthermore, the Project is consistent with the zoning and aligns with the existing uses adjacent to the development and the subject request would contribute to the neighborhood and serve the needs of neighboring residents, employees, and visitors.

Therefore, as proposed and conditioned, the sale and dispensing of a full line of alcoholic beverages within the proposed hotel will not detrimentally affect nearby residentially zoned communities or any other sensitive uses in the area.

Site Plan Review Findings

Following are the findings for Site Plan Review, for a development project which creates, or results in a net increase of 50 or more dwelling units and/or guest rooms, as required by LAMC Section 16.05.

12. The project is in substantial conformance with the purposes, intent and provisions of the General Plan, applicable community plan, and any applicable specific plan.

The Project Site is currently developed with four low-rise commercial and warehouse buildings comprising approximately 89,510 square feet of floor area, as well as associated surface parking and alley areas. The Project proposes the demolition of all existing improvements for the construction of a new, mixed-use residential and commercial development consisting of two high-rise towers. Tower 1 (Hotel Tower) would be a 22-story building with 300 hotel guest rooms and 3,120 square feet of ground floor commercial space; and Tower 2 (Residential Tower) would be a 23-story building with 250 residential dwelling units and 10,000 square feet of ground floor commercial space. The Project would result in a total of 452,630 square feet of floor area, with a maximum height of 260 feet (for the 23-story Residential Tower). An outdoor publicly accessible paseo would bisect the Project Site, running north-south between the two towers, connecting Venice Boulevard to the north to a proposed circular drive-aisle on the southern portion of the Project Site.

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, but not limited to Housing and Conservation, Land Use, Noise, Safety, and Transportation. The City's Land Use Element is divided into 34 Community Plans that establish parameters for land use decisions within those sub-areas of the City. The Project is consistent with the various elements of the General Plan, including the Framework Element, Mobility Element (Mobility Plan 2035), Health and Wellness Element, Air Quality Element and the Land Use Element (Downtown Community Plan).

Framework Element

The Framework Element for the General Plan (Framework Element) was adopted by the City of Los Angeles in December 1996 and re-adopted in August 2001. The Framework Element provides guidance regarding policy issues for the entire City of Los Angeles, including the Project Site. The Framework Element also sets forth a Citywide comprehensive long-range growth strategy and defines Citywide policies regarding such

issues as land use, housing, urban form, neighborhood design, open space, economic development, transportation, infrastructure, and public services.

The Project is consistent with the goals and objectives of the Framework Element as described below:

Chapter 3: Land Use

The Land Use Chapter of the Framework Element identifies objectives and supporting policies relevant to the Project Site. Those objectives and policies seek, in part, to encourage the development of commercial uses and structures that integrate a mix of commercial and residential uses. The Project supports and will be generally consistent with the General Plan Framework Land Use Chapter as it accommodates development of a hotel, apartments, and commercial uses in accordance with the applicable policies of the Downtown Community Plan. Specifically, the Project would be consistent with the following goals and objectives, as set forth in the General Plan Framework Land Use Chapter:

Goal 3A: *A physically balanced distribution of land uses that contributes towards and facilitates the City's long-term fiscal and economic viability, revitalization of economically depressed areas, conservation of existing residential neighborhoods, equitable distribution of public resources, conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, assurance of environmental justice and a healthful living environment, and achievement of the vision for a more livable city.*

> ***Objective 3.1:*** *Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.*
>
> ***Objective 3.2:*** *Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicular trips, vehicle miles traveled, and air pollution.*
>
> > ***Policy 3.2.3:*** *Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.*
>
> ***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.*

The Project would provide a diverse mix of uses, including a hotel, residential units, and ground floor commercial space on an infill site in a heavily urbanized and central location. The Project would also provide 25,768 square feet of residential open space within the Residential Tower in compliance with the LAMC, including a podium terrace with a pool, fitness center, lounge, and roof terrace. Additionally, some residents will have access to

private open space in the form of balconies. The Hotel Tower would also provide amenity and recreation spaces, including two terraces totaling approximately 11,000 square feet and a 1,663 square-foot fitness center. Additionally, the Project would provide development that emphasizes pedestrian and bicycle access. A publicly accessible paseo bisecting the Project Site and connecting Venice Boulevard to the circular driveway in the rear of the Project would provide a usable and inviting amenity between the two Towers, featuring landscaped planters, decorative paving, outdoor seating, and short-term bicycle parking and adding additional open space opportunities to the community. Bicycle parking spaces would be provided in accordance with LAMC requirements for residents, employees, and visitors on the ground floor at various locations throughout the Project Site, including short-term bicycle parking located along the street and paseo frontages and in front of the ground floor commercial spaces to both improve convenience and activate more of the Project Site. With this complementary mix of uses and integrated amenities, the Project will serve the needs of the City's existing and future residents, employees, and visitors.

The Project Site is located in a transit-rich area in close proximity to multiple bus and rail lines and stations, including the Pico Station and Grand/LATTC Station on the Metro A and E light-rail lines, ideal for the proposed scale and nature of development. The wide availability and proximity of transit options and colocation of uses in this location will provide convenient alternatives to driving, helping to reduce vehicle miles traveled and supporting the City's sustainability and mobility goals.

Thus, the Project would develop a mix of residential and commercial uses on a centrally-located site conducive to a variety of transit options, in support of goals advocating for such developments.

Chapter 5: Urban Form and Neighborhood Design

The Project is consistent with the following goals and objectives of the General Plan Framework Urban Form and Neighborhood Design Chapter:

Goal 5A: *A livable City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and citywide scales.*

> ***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.*
>
> > ***Policy 5.2.2:*** *Encourage the development of centers, districts, and selected corridor/boulevard nodes such that the land uses, scale, and built form allowed and/or encouraged within these areas allow them to function as centers and support transit use, both in daytime and nighttime (see Chapter 3: Land Use). Additionally, develop these areas so that they are compatible with surrounding neighborhoods, as defined generally by the following building characteristics.*
>
> ***Objective 5.5:*** *Enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm.*
>
> ***Objective 5.9:*** *Encourage proper design and effective use of the built environment to help increase personal safety at all times of the day.*
>
> > ***Policy 5.9.1:*** *Facilitate observation and natural surveillance through improved development standards which provide for common areas, adequate lighting, clear*

definition of outdoor spaces, attractive fencing, use of landscaping as a natural barrier, secure storage areas, good visual connections between residential, commercial, or public environments and grouping activity functions such as child care or recreation areas.

The Project proposes a high-quality development that builds upon the existing urban modern architectural character of the surrounding area. The Project incorporates contemporary architectural design elements that are compatible with similar newer mid- and high-rise developments in the vicinity. The exterior building materials and features include retractable glass walls, metal panel screens, digital signs (as part of the Sign District), metal railings on residential balconies, and painted artwork within various terraces, which create a sleek contemporary design that complements other similar developments in the surrounding area.

The Project includes a variety of features that improve the enhance the public realm, including active ground floor frontages with commercial spaces and outdoor seating, street trees, and bike parking. Ground floor commercial spaces will have tall glass walls to increase transparency and improve the streetscape where there currently are plain building walls. The paseo is designed with decorative pavement, landscaped planters, and stainless steel planters and would replace an existing private alleyway, thereby physically improving the property and enhancing pedestrian safety. As such, the Project would enhance both the Project Site and the surrounding area.

Chapter 7: Economic Development

The Project is consistent with the following goals of the General Plan Framework Economic Development Chapter:

Goal 7A: *A vibrant economically revitalized City.*

Goal 7B: *A City with land appropriately and sufficiently designed to sustain a robust commercial and industrial base.*

Goal 7C: *A City with thriving and expanding businesses.*

Goal 7G: *A range of housing opportunities in the City.*

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 to enable a reasonable portion of the City's work force to both live and work in the City.*

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 Project would contribute to the continued growth and success of the Downtown neighborhood by redeveloping a site currently developed with low-rise commercial buildings and surface parking with high-rise buildings containing a mix of residential and commercial uses. The Project would create 250 residential units of various types, including studios, one-bedroom, two-bedroom, and three-bedroom units, and bring additional housing to Downtown; 300 hotel guest rooms to support the economy and tourist and entertainment industries; and ground floor commercial space to provide services and amenities for residents and visitors alike. The Project Site is in a centrally located and heavily urbanized

urban core, ideal for the concentration of such uses. With its strategic location along major transit corridors and a complementary mix of residential and commercial uses, the Project would help accommodate future population growth while providing jobs and serving visitors. By concentrating development near transit infrastructure, the Project supports the optimization and sustainability of recent and planned infrastructure investments.

Housing Element

The City's Housing Element for 2021–2029 (Housing Element) was adopted by the Los Angeles City Council on November 24, 2021. The Project is consistent with the following goal, objective, and policy of the Housing Element:

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.*
>
> > ***Policy 3.2.1:*** *Promote the integration of housing with other compatible land uses at both the building and neighborhood level.*
> >
> > ***Policy 3.2.2:*** *Promote new multi-family housing, particularly Affordable and mixed-income housing, in areas near transit, jobs and Higher Opportunity Areas, in order to facilitate a better jobs-housing balance, help shorten commutes, and reduce greenhouse gas emissions.*
> >
> > ***Policy 1.2.2:*** *Facilitate the construction of a range of different housing types that addresses the particular needs of the city's diverse households.*

The Project would redevelop a site currently occupied by low-rise commercial buildings and surface parking with a new high-rise, mixed-use residential and commercial development. The Project proposes a Residential Tower containing 250 dwelling units of various sizes, including studio, one-bedroom, two-bedroom, and three-bedroom units. The Project also includes a Hotel Tower with 300 guest rooms, and over 13,000 square feet of ground floor commercial space. Together, the Project's mix of uses reflects a sustainable land use pattern that provides housing, jobs, services, and amenities.

The Project is also located in a Transit Priority Area in close proximity to various modes of transit, which helps reduce the Project's overall environmental footprint and supports lower per capita greenhouse gas emissions by promoting alternatives to private vehicle use. The Project would also implement improvements in the public right-of-way, including new sidewalks, street trees, and upgraded street lighting. These enhancements will improve pedestrian safety, increase walkability, and enrich the overall public realm, thereby facilitating the use of transit and promoting health through a pedestrian-oriented design.

Therefore, by introducing sustainable buildings and a land use pattern that combines a hotel and multi-family housing within a mixed-use development with convenient access to jobs, amenities, and transportation, the Project directly supports the goals, objectives, and policies of the Housing Element.

Mobility Element (Mobility Plan 2035)

The Mobility Plan 2035, adopted in September 2016, serves as the Mobility Element of the General Plan and guides development of a citywide transportation system with the goal of ensuring the efficient movement of people and goods and recognizes that primary emphasis must be placed on maximizing the efficiency of existing and proposed transportation infrastructure through advanced transportation technology, reduction of vehicle trips, and focused growth in proximity to public transit. The Mobility Plan 2035 includes goals that define the City's high-level mobility priorities and sets forth objectives and policies to establish a citywide strategy to achieve long-term mobility and accessibility within the City of Los Angeles. The Project would be in conformance with the following policies of the Mobility Element:

Chapter 2: World Class Infrastructure

Policy 2.3: *Recognize walking as a component of every trip and ensure high-quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.*

Chapter 3: Access for All Angelenos

Policy 3.1: *Recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes – including goods movement – as integral components of the City's transportation system.*

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 3.5: *Support "first-mile, last-mile solutions" such as multi-modal transportation services, organizations, and activities in the areas around transit stations and major bus stops (transit stops) to maximize multi-modal connectivity and access for transit riders.*

Policy 3.8: *Provide bicyclists with convenient, secure and well-maintained bicycle parking facilities.*

The Project Site is located within a designated Transit Priority Area and is well-served by public transit, including both rail and bus service. Specifically, the Project Site is located approximately 1,300 feet south of the Pico Station and approximately 1,000 feet north of the Grand/LATTC Station on the Metro A and E light-rail lines. Additionally, eight local and regional transit operators operate bus lines within one-quarter mile of the Project Site, including Metro, LADOT DASH, LADOT Commuter Express, Foothill Transit, Orange County Transportation Authority, Santa Monica Big Blue Bus, Gardena Municipal Bus Lines, and Montebello Bus Lines.

The Project's site design emphasizes safe, convenient access to surrounding neighborhood amenities and transit while fostering an active pedestrian and bicycle-friendly environment by providing multimodal access for vehicles, pedestrians, and bicycles. Vehicular access would be provided via a single driveway off Hope Street to the rear of the Project Site, minimizing the impacts of vehicles on pedestrians. Pedestrian access across the Project Site would be provided via a publicly accessible paseo; and bicycle parking would be provided in several locations along the street frontages, along the paseo, and near the entrances to the ground floor commercial spaces and tower lobbies, as well as within both the Hotel Tower and Residential Towers. The Residential Tower would feature a dedicated

workspace within the long-term bicycle parking room on the ground floor, conveniently located near the elevators and lobby. These amenities are designed to encourage cycling and walking, thereby promoting healthier lifestyles and reducing emissions

The Project would collocate residential, commercial service, and hotel uses within one cohesive development, reflective of a land use pattern that would provide greater convenience and accessibility and reduce vehicle trips. The Project is also within walking distance of numerous destinations in Downtown Los Angeles, including retail, restaurants, and entertainment venues along Figueroa Street. The proximity to key regional destinations such as the Los Angeles Convention Center, Crypto.com Arena, Peacock Theater, and L.A. LIVE would allow hotel guests and residents to travel without relying on private vehicles, further reducing overall vehicle trips.

Streetscape improvements would enhance the pedestrian environment around the Project Site. The Project would also implement improvements in the public right-of-way, including upgraded sidewalks, street trees, and street lighting. The ground floor street frontages and along the paseo would be activated with commercial uses and lobbies for the two towers.

The Project would create a mixed-use residential and commercial development with thoughtful bicycle parking siting, streetscape-activating ground floor commercial uses lining the primary corridors, and a pedestrian-oriented paseo in a transit-rich location. In addition, the Project would implement all required dedications and improvements, such as sidewalk widening, to meet the needs of all forms of mobility. Accordingly, the Project would be consistent with the street standards and mobility objectives outlined in Mobility Plan 2035.

Health and Wellness Element

Adopted in March 2015, the Plan for a Healthy Los Angeles lays the foundation to create healthier communities for all Angelenos. As the Health and Wellness Element of the General Plan, it provides high-level policy vision, along with measurable objectives and implementation programs, to elevate health as a priority for the City's future growth and development. Through a new focus on public health from the perspective of the built environment and City services, the City of Los Angeles will strive to achieve better health and social equity through its programs, policies, plans, budgeting, and community engagement. The Project is consistent with the following:

Chapter 2: A City Built for Health

Policy 2.2: *Promote a healthy built environment by encouraging the design and rehabilitation of buildings and sites for healthy living and working conditions, including promoting enhanced pedestrian-oriented circulation, lighting, attractive and open stairs, healthy building materials and universal accessibility using existing tools, practices, and programs.*

Chapter 5: An Environment Where Life Thrives

Policy 5.1: *Reduce air pollution from stationary and mobile sources; protect human health and welfare and promote improved respiratory health.*

Policy 5.7: *Promote land use policies that reduce per capita greenhouse gas emissions, result in improved air quality and decreased air pollution, especially for children, seniors and other susceptible to respiratory diseases.*

Air Quality Element

Policy 4.2.3: *Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.*

Policy 5.1.2: *Effect a reduction in energy consumption and shift to non-polluting sources of energy in its buildings and operations.*

The Project would develop two, new high-rise towers with 300 hotel guest rooms, 250 residential units, and over 13,000 square feet of ground floor commercial uses in the southern part of Downtown Los Angeles, an area well-served by multiple public transit lines and experiencing rapid growth and high-rise development. By locating residential and commercial uses near transit and existing entertainment, residential, and commercial destinations, the Project would reduce vehicle miles traveled and decrease reliance on single-occupancy vehicle trips. The Project would also promote bicycle access by including short-term bicycle parking in a variety of locations along the street frontages, paseo, and ground floor commercial spaces, as well as by providing long-term bicycle parking located within both the Hotel Tower and Residential Towers. The Residential Tower would feature a dedicated workspace within the long-term bicycle parking room on the ground floor, conveniently located near the elevators and lobby. These amenities are designed to encourage cycling and walking, thereby promoting healthier lifestyles and reducing emissions.

The Project would also enhance the public realm by creating a central paseo bisecting the Project Site, along with landscaping and new trees. Additionally, both the Hotel and Residential Towers would offer open space in the form of terraces, fitness centers, lounges, and pool decks. By providing recreational opportunities for residents and visitors, the Project would contribute to a healthy urban environment and helping to reduce pollution.

In line with smart growth principles, the Project would deliver infill development adjacent to employment centers and transit, while incorporating sustainable building practices. The Project would comply with CALGreen and the Los Angeles Green Building Code, thereby reducing energy and water use. Additionally, per code requirements, at least 30 percent of the total code-required parking spaces would be capable of supporting future electric vehicle supply equipment (EVSE), and 10 percent of spaces would be equipped with EV chargers. The Project's proximity to major transit infrastructure would also encourage the use of alternative modes of transportation and further reduce energy consumption and emissions, which would directly support a reduction in per capita greenhouse gas emissions from residents, employees, and visitors, particularly those traveling by private vehicle. Through adherence to applicable codes and conditions, the Project would be consistent with other relevant policies, including Policy 5.1.2 of the Air Quality Element, by ensuring that new development is energy-efficient and promotes the use of clean, non-polluting energy sources. The EV parking also provides a valuable amenity for residents, employees, and visitors who utilize electric-powered equipment or vehicles.

In summary, the Project would provide service amenities that improve the habitability and functionality of the development for on-site users while minimizing impacts on neighboring properties. As such, the Project would foster a healthy built environment, encourage sustainable living, reduce air pollution, and support land use policies aimed at lowering per capita greenhouse gas emissions.

Land Use Element (Downtown Community Plan)

The Project Site is located within the Downtown Community Plan, one of 34 Community Plans which together form the Land Use Element of the General Plan. Pursuant to LAMC Section 12.36, when acting on multiple applications for a project, when appropriate, findings may be made by reference to findings made for another application involving the same Project. As detailed above in Finding Nos. 1, 5, and 8, the Project is in substantial conformance with the purposes, intent and provisions of the Downtown Community Plan as well as the Downtown Design Guide. As such, the Project substantially conforms with the Land Use Element of the General Plan.

13. The project consists of an arrangement of buildings and structures (including height, bulk and setbacks), off-street parking facilities, loading areas, lighting, landscaping, trash collection, and other such pertinent improvements, that is or will be compatible with existing and future development on neighboring properties.

The Project Site is located in the southern part of Downtown Los Angeles and is bounded by Venice Boulevard to the north, South Hope Street to the east, an unnamed alley and the Interstate 10 freeway to the south, and Flower Street to the west. The Project Site is currently developed with four low-rise commercial buildings and associated surface and rooftop parking. A private alleyway bisects the Project Site and provides access from Venice Boulevard to the rear parking area. The Project proposes to demolish all existing improvements for the development of a new mixed-use development consisting of a 22-story Hotel Tower with 300 guest rooms, a 23-story Residential Tower with 250 residential dwelling units, and 13,120 square feet of ground floor commercial space. At completion, the Project would total 452,630 square feet of floor area, and would rise to a maximum of 260 feet (for the Residential Tower).

Bulk, Mass, Height

The Project Site is located in a heavily urbanized area and generally surrounded by low- and mid-rise commercial and residential buildings, although several high-rise developments are located one- to two-blocks west and north of the Project Site. To the north of the Project Site, across Venice Boulevard, are a one-story commercial building and the Venice Hope Park. To the east of the Project Site, across Hope Street, are four- and six-story affordable housing buildings. To the south of the Project Site, across the public alley, is the Interstate 10 freeway. To the west of the Project Site, across Flower Street, are one-story warehouse buildings and surface parking.

While the Project Site is generally surrounded by low- and mid-rise buildings, this part of Downtown continues to experience rapid growth with the introduction of taller buildings with a variety of residential, commercial service, and hotel uses being introduced within an area previously concentrated with low-scale commercial uses. With a maximum height of 23 stories and 260 feet, the Project would be similar in scale to or shorter than other high-rise developments nearby, including the 37-story Moxy and AC Hotel tower and the 43-story Hope + Flower apartment towers, one block north of the Project Site. As discussed in Finding Nos. 1, 5, and 8, the Project is located on a site designated for tall high-rise developments; as such, the Project would be consistent with the scale of development envisioned for this location and within the range of heights of existing developments in the surrounding area.

The Project design consists of two towers each above a five-story podium which would mirror the prevailing mid-rise massing in the immediate vicinity of the Project Site. Above the podium level, the towers are slender and rectangular-shaped and face perpendicular to

each other, creating variation in mass and form. Additionally, both towers feature open terrace levels and architectural features that cut into the tower buildings, adding visual interest and further reducing bulk and mass.

As such, the Project employs architectural design features to reduce perceived scale, and the proposed height, bulk, and mass of the Project would be consistent with the scale of existing and future proposed developments within the surrounding neighborhood.

Setbacks

The Project is subject to the setback requirements of the underlying C2 Zone. Pursuant to LAMC Section 12.22 A.18, setbacks are not required for mixed-use residential and commercial projects in the C2 Zone provided that such projects provide only commercial uses on the ground floor and only residential uses on the upper floors. The Project meets these requirements and therefore is not required to provide any building setbacks. However, the Project provides step-backs at the upper levels, as both towers have outdoor podium decks on Level 5; above Level 5 the Hotel Tower rises above the western portion of its podium and leaves the eastern portion open to the sky, while the Residential Tower rises above the southern portion of its podium and leaves the northern portion open to the sky. As such, the Project creates both appropriate separation distances between the two towers as well as external step-backs above the ground floor.

Off-Street Parking and Loading Areas

Vehicular access to the Project would be provided from a driveway off of Hope Street at the southeastern corner of the Project Site, which leads to a circular on-site pick-up/drop-off area and ramps leading to the parking levels in each tower. Loading areas are also located off of the circular driveway. All driveways and access would be designed in accordance with the LADOT standards. By siting vehicular access and loading along the rear of the Project Site, the Project minimizes impacts and interruptions on the streetscape and orients the Project's active uses towards the primary street and paseo frontages.

The Project would provide 283 vehicle parking spaces for the proposed uses, including eight spaces reserved for the property at 1721 South Flower Street, as required by Condition No. 7 of Case No. ZA-2003-9927-CUX-PA5-1A, within three above-grade parking levels contained within two podium structures (one at the base of each proposed tower building). The parking levels would be screened with metal panels and mesh, as depicted in the architectural plans in Exhibit A, to shield the view of cars and headlights from view from any public rights-of-way. The Project would also install 10 percent of the total provided parking spaces with EV chargers and design an additional 20 percent of the total provided parking spaces for EVSE, in compliance with the LAMC.

The Project would also provide bicycle parking spaces in accordance with LAMC requirements. Short-term bicycle parking would be located throughout the Project Site at the ground floor along the street frontages, within the paseo, and in front of the commercial storefronts, thereby enhancing convenience and useability. Long-term bicycle parking would be located within dedicated storage lockers in both the Hotel Tower and Residential Tower.

Landscaping

Currently, there are no existing trees or other significant landscaping on the Project Site. The Project would provide new landscaping on the Project Site in the form of landscaped planters along the paseo and planted trees at the ground level and on the upper and rooftop outdoor terraces in each tower. The Project would also cover a minimum of 25 percent of

the provided residential open space with ground cover, trees, or other plant cover The Project would also plant new street trees in the public right-of-way (per the requirements and to the satisfaction of the Bureau of Street Services, Urban Forestry Division). As such, the Project would improve the existing Project Site with additional landscaping that would enhance the physical environment of the surrounding community.

Trash Collection

As conditioned, all trash and recycling areas would be enclosed and screened from public view, accessed via the vehicle driveway at the rear of the Project Site. Enclosing trash collection with the building envelope will prevent any negative impacts on surrounding properties.

Lighting & Building Signage

The Project would introduce new residential, hotel, and commercial service uses that would include accent and security lighting in compliance with LAMC requirements, and consistent with lighting levels provided for adjacent commercial and residential uses. In addition, as discussed in Finding Nos. 1 and 2, the Project includes a proposed Sign District that would permit a variety of sign types and dimensions, including Supergraphic and Digital Display signs, displaying both on-site and off-site signage. The proposed Sign District includes a comprehensive set of development standards and guidelines governing signage illumination, including limitations that restrict light intensity to no more than three foot-candles above ambient lighting as measured at the property line of the nearest residentially zoned property, and illumination for Digital Display signs to no more than 5,000 candelas per square meter during the daytime and no more than 300 candelas per square meter during the nighttime. In addition, certain light types such as strobe and flashing lights are prohibited. The Sign District would also require illumination testing protocols and certification from LADBS for digital displays to ensure ongoing compliance with these regulations. Therefore, the Project's lighting and signage features will be in compliance with the LAMC or as otherwise permitted by the proposed Sign District.

14. Any residential project provides recreational and service amenities to improve habitability for its residents and minimize impacts on neighboring properties.

The Project would include a total of 25,768 square feet of residential open space in the Residential Tower, including a 2,043 square-foot lobby/lounge on the ground floor; a 9,630 square-foot outdoor podium terrace, a 2,000 square-foot indoor fitness center, and a 1,500 square-foot indoor lounge on Level 5; a rooftop outdoor terrace on Level 23 that would include a pool, multiple seating areas, a fireplace, planters and trees, and a 676 square-foot indoor amenity room on Level 23. Certain residential units would also have access to private balconies, with 5,050 square feet of such balconies counting towards LAMC requirements (although in practice the balcony areas would total a greater amount). The Project would also provide additional open space which is not counted towards the Project's residential open space requirement, such as the 4,200 square-foot publicly accessible paseo, an additional 1,800 square-foot outdoor terrace on Level 9, and recreational and service amenities in the Hotel Tower, including two outdoor terraces totaling 11,000 square feet and a 1,663 square-foot fitness center. As such, the Project provides recreational and service amenities for residents and visitors alike, which will minimize impacts on neighboring properties.

Director's Determination Findings

Following are the findings for the request to 10 percent reduction in the total required usable open space, as required by LAMC Section 12.21 G.3(c).

15. The open space provided conforms with the objectives of LAMC Section 12.21 G.

The purpose of LAMC Section 12.21 G is to ensure that residential projects include a sufficient amount of open space to provide recreational amenities and improve habitability for residents. An Applicant may request a reduction of 10 percent in the required amount of residential open space provided such reduction is in the required amount of common open space only. With the number and typology of residential units proposed, the Project would be required to provide 26,925 square feet of open space. As the Project proposes 5,050 square feet of private open space to be counted towards LAMC requirements by way of balconies, the Project would otherwise be required to provide 21,875 square feet of common open space. In conjunction with the requested 10 percent reduction in common open space, a total of 19,688 square feet of common open space would be required. The Project proposes 20,718 square feet of common open space and a total 25,768 square feet of open space within the Residential Tower, and thus meets the requirements of this section.

The Residential Tower includes a 2,043 square-foot lobby/lounge on the ground floor; a 9,630 square-foot outdoor podium terrace, a 2,000 square-foot indoor fitness center, and a 1,500 square-foot indoor lounge on Level 5; a rooftop outdoor terrace on Level 23 that would include a pool, multiple seating areas, a fireplace, planters and trees, and a 676 square-foot indoor amenity room on Level 23. Certain residential units would also have access to private balconies, with 5,050 square feet of such balconies counting towards LAMC requirements (although in practice the balcony areas would total a greater amount). The Project would also provide additional open space which is not counted towards the Project's residential open space requirement, such as an additional 1,800 square-foot covered outdoor terrace on Level 9, the 4,200 square-foot publicly accessible paseo, and recreational and service amenities in the Hotel Tower, including two outdoor terraces totaling 11,000 square feet and a 1,663 square-foot fitness center. As such, the Project provides recreational and service amenities for residents and visitors alike, and meets the intent of the LAMC.

16. The proposed project complies with the total usable open space requirements.

The Project complies with the various requirements of useable open space as outlined in LAMC Section 12.21 G(2). Common open space would constitute more than 50 percent of the total amount of open space, be open to the sky, be readily accessible to all residents, and meet the dimensional and siting requirements outlined in the LAMC. A minimum of 25 percent of outdoor open space would be planted and trees planted above the ground floor would have adequate soil depth to ensure viability. The Project would also provide common indoor open space and private open space in the form of balconies for certain residential units, all of which would meet the dimensional and sizing requirements outlined in the LAMC. As such, the Project meets the requirements of this section.

CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) FINDINGS

The City of Los Angeles, as the Lead Agency, prepared a Sustainable Communities Environmental Assessment (SCEA), Case No. ENV-2018-3337-SCEA, and an Erratum dated September 2024, for the proposed Project, which includes the construction of a two-tower, mixed-use development consisting of 250 residential dwelling units, 300 hotel guest rooms, and 13,120 square feet of ground floor commercial uses. At its meeting on October 1, 2024 (Council File No. 24-0812) and after consideration of all comments received regarding the SCEA and the Project,

the City Council adopted the SCEA pursuant to Public Resources Code (PRC) Section 21155.2(b), finding that the Project is a “transit priority project” as defined by PRC Section 21155 and has incorporated all feasible mitigation measures, performance standards, or criteria set forth in prior Environmental Impact Reports (EIRs), including SCAG 2020-2045 RTP/SCS EIR; finding all potentially significant effects required to be identified in the initial study have been identified and analyzed in the SCEA; finding with respect to each significant effect on the environment required to be identified in the initial study for the SCEA, changes or alterations have been required in or incorporated into the Project that avoid or mitigate the significant effects to a level of insignificance or those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency; finding the SCEA reflects the independent judgement and analysis of the City; finding the mitigation measures have been made enforceable conditions on the project; and adopted the SCEA and the Mitigating Monitoring Program prepared for the SCEA.

PUBLIC HEARING AND COMMUNICATIONS

Public Hearing

A joint public hearing was held virtually and telephonically via Zoom by the Deputy Advisory Agency (DAA) and Hearing Officer (HO), on behalf of the City Planning Commission, on March 5, 2025 at 9:30 a.m., for the proposed subdivision and Project entitlements. In attendance were approximately 12 individuals, including the Applicant's team and representative, and various members of the public. No representatives from Council District 14 or the Downtown Los Angeles Neighborhood Council identified themselves at the hearing.

Summary of Public Testimony

At the hearing, the Project Team presented the following information:

- Project Background
- Overview of Project entitlement requests
- Overview of the Tract Map request
- Overview of the design elements

Specifically, the Applicant's Representative stated that the requested Waiver of Improvement along Venice Boulevard to accommodate a curb cut-out for a passenger drop-off area meets the requirements for an exception from the Downtown Design Guidelines and is therefore permissible.

During public comment, five members of the public spoke on the Project:

- A local resident was concerned about the timeframe of the project and displacement of local employees.

- A local resident was worried about construction impacts such as air quality and noise, as well as impacts on the movement of people accessing adjacent properties and throughout the area during construction.

- A member of the Western States Regional Council of Carpenters (WSRCC) was in favor of the Project.

- Mr. Yadegar, a local business owner, stated that they support the Project but they currently utilize parking at the Project Site and have concerns about the number and location of parking spaces that would be provided.

- A representative of an existing local non-profit currently occupying a space on the Project Site stated that there has been insufficient communication from the Applicant and emphasized the importance of their organization.

In response to public comments:

- The Applicant's Representative responded to the environmental impact concerns, reiterating that the Project's environmental analysis includes mitigation measures and regulatory measures that would ensure less-than-significant impacts.

The Hearing Officer did not have any additional questions for the Applicant's Team. The Hearing Officer clarified that the exception cited by the Applicant regarding the curb cut-out along Venice Boulevard only applies when off-street drop off is not feasible; however, the Project proposes a

large driveway area on-site that facilitates valet, drop-off, and vehicle circulation for the hotel use with access along Hope Street.

Following Staff and Applicant responses to Public Testimony, the DAA provided comment and deliberated on the request before them. A representative from the Bureau of Engineering (BOE) requested that a number of conditions be corrected and a condition be added to comply with the Downtown Design Guidelines. The DAA decided to take the subdivision request under advisement due to changes requested by BOE and an outstanding letter from Bureau of Street Services related to the Haul Route request.

With no other questions or speakers, the Hearing Officer closed the hearing and informed the attendees that the Project would be considered by the City Planning Commission on June 12, 2025.

Communications Received

City Planning has received multiple written communications from Mr. Yadegar reiterating ongoing concerns regarding his utilization of parking spaces at the Project Site; and one comment letter from an individual representing/affiliated with WSRCC and two comment letters from the Downtown Los Angeles Neighborhood Council, all in support of the Project.

EXHIBIT A

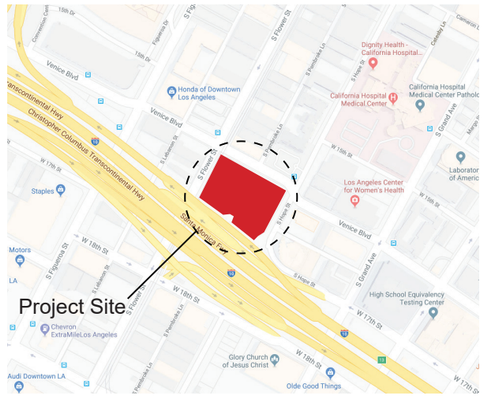
PROJECT PLANS

CPC-2018-3336-SN-TDR-CUB-SPR-MSC

July 10, 2025

South Park Towers

426-440 W. Venice Blvd, 1600-1618 S. Flower Street, 1611-1623 S. Hope Street, Los Angeles, CA



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5	Ground Level Plan	L6	9th & 10th Level Plan
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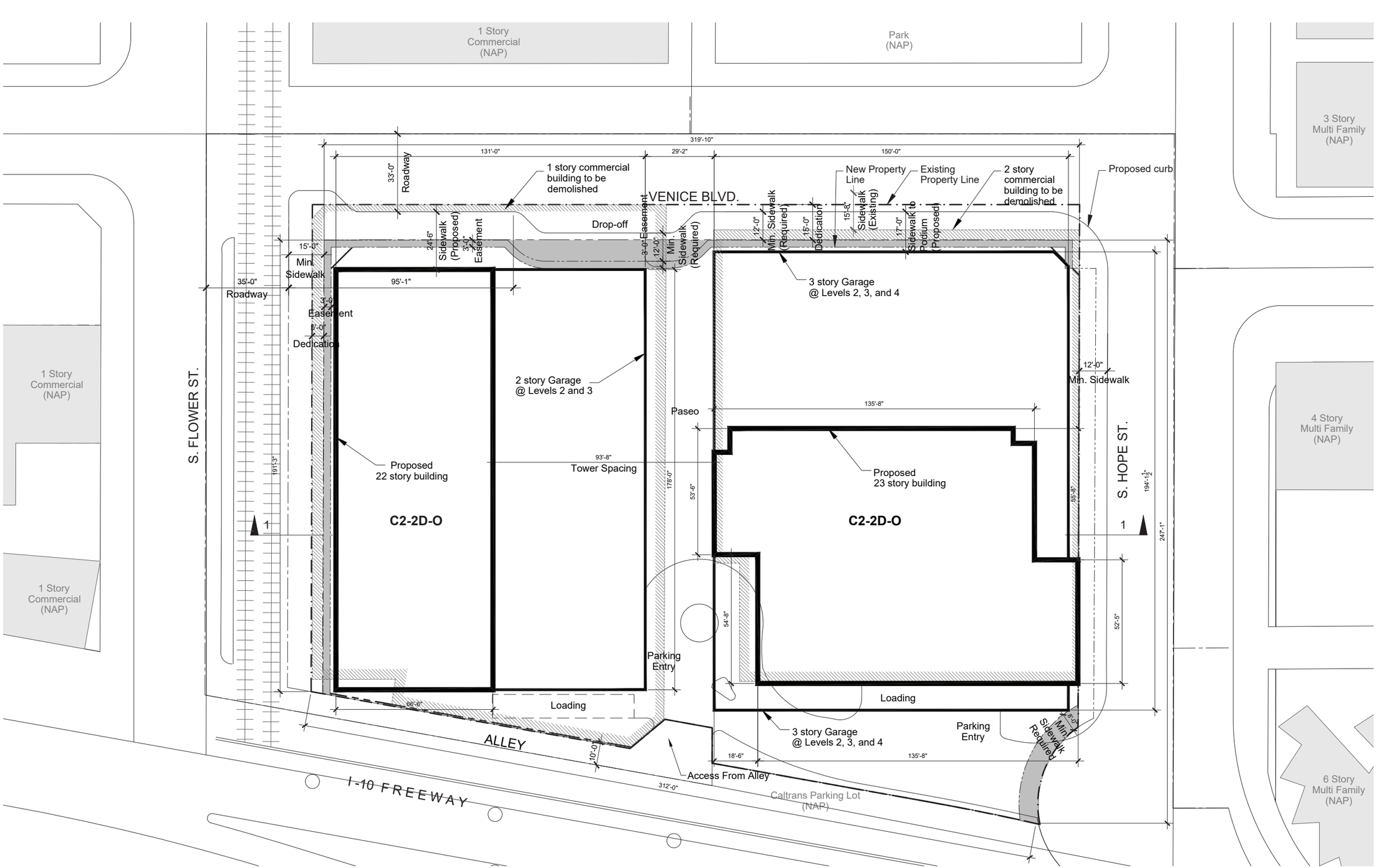
Venice Hope Group, LLC

May 29, 2025

444 S Flower Street - Suite 1220
Los Angeles, California 90071

213.614.6050
213.614.6051 fax
www.tsminc.com



South Park Towers

Los Angeles, CA

Venice Hope Group, LLC

Plot Plan

1

0 20 40 80 ft

May 29, 2025

444 S Flower Street - Suite 1220
Los Angeles, California 90071
213.614.6050
213.614.6051 fax
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Hope and Venice Project Summary

Zone:	**C2-2D-O**	
Lot Area:	**75,503 sf**	
Allowable FAR	**453,018 sf**	**(6:1)**
Total FAR Provided	**452,630 sf**	**(6:1)**
Residential	241,510 sf	269,020 gsf
Hotel	198,000 sf	
Retail	13,120 sf	
Maximum Height:	**No Height Limit**	
Proposed Height:	**260 ft**	
Setbacks		
East Tower:	N/A Per Downtown Housing Incentive	
West Tower:	N/A Per LAMC 12.22.A.18	

Bike Parking Required / Provided

Residential Bike Parking	Parking Ratio	Minimum Required	Vehicular Reduction	Provided
Long Term	1 Space / 4 Units	63	1 space / 4 bikes	69 <
Short Term	1 Space / 40 Units	6	32 spaces	128
Total Res. Bike Parking		69	128	**128**
				120 Long Term + 8 Short Term

Hotel Bike Parking	Parking Ratio	Minimum Required	Vehicular Reduction	Provided
Long Term	1 Space / 10 Keys	30	1 space / 4 bikes	60 >
Short Term	1 Space / 10 Keys	30	14 spaces	56
Total Hotel Bike Parking		60	56	**60**
				30 Long Term + 30 Short Term

Retail Bike Parking	Parking Ratio	Minimum Required	Vehicular Reduction	Provided
Long Term	1 Space / 2,000 sf	7	1 space / 4 bikes	13 <
Short Term	1 Space / 2,000 sf	7	6 spaces	24
Total Retail Bike Parking		13	24	**24**
				16 Long Term + 8 Short Term

Total Bike Parking	166 Long Term + 46 Short Term	**212**

Open Space Required = 24,233 sf

Unit Type/Habitable Rooms		# of Units	Ratio	Area Required
Studio	2	75	100 sf	7,500 sf
1 Bed	2	104	100 sf	10,400 sf
2 Bed	3	68	125 sf	8,500 sf
Penthouse	4	3	175 sf	525 sf
Total Open Space Required - Per LAMC 12.21.G.2				26,925 sf
10% Reduction - Per LAMC 12.21.G.3				**24,233 sf**
Maximum Interior Open Space Area - Per LAMC 12.21.G.2(a)(4)				6,058 sf (25%)

Open Space Provided = 25,768 sf

Open Space			Area Provided
Common - Podium Terrace		9,630 sf	
Common - Amenity Spaces		6,058 sf	20,718 sf
Common - Roof Terrace		5,030 sf	
Private - Balconies (50 sf/DU)	101 Units		5,050 sf
Total Open Space Provided			**25,768 sf**
Interior Open Space Area Provided			6,058 sf
Required / Provided Planted Common Open Space - Per LAMC 12.21.G.2(a)(3)			5,180 sf (25%)

South Park Towers

Los Angeles, CA

Venice Hope Group, LLC

Proposed Residential Density* = 250 Units

*Per LAMC 12.22.C.3.c

Unit Type	Area	Level 5 (Podium)	Cut-Away Levels (x2)	Typical Levels (x15)	Level 23	Total	%
S1 - Studio	456 sf	2	0	0		2	0.8%
S2 - Studio	562 sf	1	2	15		18	7.2%
S3 - Studio	568 sf	1	4	30		35	14.0%
S4 - Studio	570 sf	2	0	0		2	0.8%
S5 - Studio	720 sf	1	2	15		18	7.2%
A1 - 1-Bedroom	758 sf	3	8	75		86	34.4%
A2 - 1-Bedroom + Den	940 sf	1	2	15		18	7.2%
B1 - 2-Bedroom	1,010 sf	1	2	15		18	7.2%
B2 - 2-Bedroom	1,075 sf	0	2	15		17	6.8%
B3 - 2-Bedroom	1,080 sf	1	2	15		18	7.2%
B4 - 2-Bedroom	1,135 sf	0	0	15		15	6.0%
PH - 3-Bedroom	1,900 sf				3	3	1.2%
Total Units	**823 sf**	Average-area				**250**	

Proposed Hotel Density = 300 Units

Unit Type	Average Area	Levels 5, 6, and 7 (x3)	Cut-Away Levels (x2)	Typical Levels (x11)	Level 22	Total	%
Hotel 1							
K - King	408 sf	9	2	33	3	47	15.7%
DQ - Double Queen	415 sf	27	14	99	8	148	49.3%
Hotel 2					Hotel 1 Subtotal	**195**	
KS - King Suite	425 sf	6		4		10	3.3%
QS - Queen Suite	500 sf	15	10	55	2	82	27.3%
1BD - 1-Bedroom	888 sf		2	9	2	13	4.3%
Average Area	**458 sf**				Hotel 2 Subtotal	**105**	
Total Units						**300**	

Vehicular Parking Required / Provided

Residential Parking	Total Units	Parking Ratio (LAMC 12.21.A4.p)	Parking Required	Vehicular Reduction (LAMC 12.24.S)	Vehicular Reduction (LAMC 12.21.A.4)	Total Parking Req.	Provided Location / Type	Provided	
Studios	75	1	75	-20%	1 space / 4 bikes	51	East Level 2 (47+3 acc) East Level 3 (1)	51	
1-BDs	104	1	104	-53	15% max	71	East Level 3 (58+2acc) East Level 4 (11)	71	
2-BDs	71	1.25	89		-32	61	East Level 4 (27), West Automated (70)	97	
Total Residential Parking			268	215	183	**183**	***214 standard(98%)+0 compact(0%)+5 accessible(2%)***	**219**	77%
Hotel Parking	**Total Units**	**Parking Ratio (LAMC 12.21.A4.p)**	**Parking Required**	**Vehicular Reduction (LAMC 12.24.S)**	**Vehicular Reduction (LAMC 12.21.A.4)**	**Total Parking Req.**	**Location**	**Provided**	
First 20 Units	20	2	10	-20%	1 space / 4 bikes	6	West Level 2 (4+2acc)	6	
Second 40 Units	40	4	10	-12	30% max	6	West Level 2 (6)	6	
Remaining 240 Units	240	6	40		-14	22	West Level 2 (22+3c=22)	25	
Total Hotel Parking			60	48	34	**34**	***32 standard(87%)+3 compact(8%)+2 accessible(5%)***	**37**	13%
Retail Parking	**Area**	**Parking Ratio (LAMC 12.21.A4.p)**	**Parking Required**	**Vehicular Reduction (LAMC 12.24.S)**	**Vehicular Reduction (LAMC 12.21.A.4)**	**Total Parking Req.**	**Location**	**Provided**	
Hotel Retail	3,100 sf	500	7	-20%	1 space / 4 bikes	4	West Level 2 (3+1acc)	4	
Residential Retail	10,000 sf	500	20	-5	30% max -6	12	West Level 2 (5), West Level 3 (8+2c=10)	15	
Total Retail Parking			**27**	22	16	**16**	***16 standard(85%)+2 compact(10%)+1 accessible(5%)***	**19**	7%

1721 Flower Parking	Parking Required per Covenant & Agreement Recorded 10/1/84		Location	Provided	
	8	8	West Level 3 (7+1acc)	8	
Total 1721 Flower Parking	**8**	**8**	***7 standard (88%)+1 accessible(12%)***	**8**	3%

Total Parking Required/Provided	**241**	***269 standard(95%)+5 compact(2%)+9 accessible (3%)***	**283**

Vehicular Parking

Level / Tower Type	West Standard	Compact	Accessible (inc. van)	EVCS/EV Capable	East Standard	Compact	Accessible (inc. van)	EVCS/EV Capable	**Total**
Level 2	30	3	3	10	29	0	3	18	96
Level 3	78 (8 + 70 automated)	2	1	7	35	0	2	24	149
Level 4	0	0	0	0	25	0	0	13	38
Sub Total Parking	**108**	**5**	**4**	**17**	**89**	**0**	**5**	**55**	**283**
	38%	2%	1%	6%	31%	0%	2%	19%	100%
Total Parking	**134**				**149**				**283**
									98% standard or better parking + 2% compact parking

Electric Vehicle Parking Required

	Parking Ratio	Residential	Hotel	Retail	1721 Flower	**Total**
Total required parking		183	34	16	8	241
EV parking (including EVCS)	30% of total required parking	**55**	**10**	**5**	**2**	**72**
EVCS parking*	10% of total required parking	18	3	2	1	24
EV future parking	EV - EVCS =	19	4	1	1	25
Wide EV parking (1:25) (4.106.4.2.1) & (4.106.4.2.2)	EV / 25	2	1	1	1	5
Total EV parking required						**72**

*Per LA EV charging ordinance sec. 99.04.10.4.4, the number of EVCS parking can be counted towards the total number of EV parking required

Accessible Parking Required

Use	Parking Ratio	Total parking	**Required**
Residential accessible parking (per CBC 1109A.8.6)	2% of assigned parking	219	**5**
Residential accessible parking to be van parking (per CBC 1109.A .4)	1 : 8 (1 min.)	1	1 of 5
Hotel accessible parking (per CBC 11B 208.2)	25-50	37	**2**
Hotel accessible parking to be van parking (per CBC 11B 208.2.4)	1 : 6 (1 min.)		1 of 2
Retail accessible parking (per CBC 11B 208.2)	1 to 25	19	**1**
Retail accessible parking to be van parking (per CBC 11B 208.2.4)	1 : 6 (1 min.)		1 of 1
1721 Flower accessible parking (per CBC 11B 208.2)	1 to 25	8	**1**
1721 Flower accessible parking to be van parking (per CBC 11B 208.2.4)	1 : 6 (1 min.)		1 of 1
Total accessible parking			**9**
Total accessible parking to be van parking			4 of 9

Project Summary

444 S Flower Street - Suite 1220
Los Angeles, California 90071
213.614.6050
213.614.6051 fax
www.tsminc.com

May 29, 2025

DATE OF SURVEY:

09/10/2012

TITLE INFORMATION STATEMENT:

TITLE INFORMATION SHOWN HEREON IS PER PRELIMINARY REPORT NO. 116744296-X49, DATED MARCH 08, 2012 AS PREPARED BY CHICAGO TITLE COMPANY, LOS ANGELES, CA. NO RESPONSIBILITY OF CONTENT, COMPLETENESS OR ACCURACY OF SAID REPORT IS ASSUMED BY THIS MAP OR THE SURVEYOR.

SITE ADDRESS:

1601-1625 SOUTH HOPE STREET & 1600-1616 SOUTH FLOWER STREET
(ADDRESS DERIVED FROM PROVIDED PRELIMINARY REPORT)

LAND AREA:

75,503 SQUARE FEET / 1.733 ACRES

TAX PARCEL NUMBER:

5134-008-006

RECORD OWNER:

FREDERICK OKEN, STANFORD OKEN, AND RUTH DAWSON AS SUCCESSOR CO-TRUSTEES OF THE SURVIVORS TRUST CREATED UNDER THE WILL OF HARRY OKEN, A FIFTY PERCENT (50%) UNDIVIDED INTEREST; FREDERICK OKEN, STANFORD OKEN, AND RUTH DAWSON AS SUCCESSOR CO-TRUSTEES OF THE MARITAL DEDUCTION TRUST CREATED UNDER THE WILL OF HARRY OKEN, AS TO THIRTY-EIGHT AND 14/100 PERCENT (38.14%) UNDIVIDED INTEREST; FREDERICK OKEN, STANFORD OKEN, AND RUTH DAWSON AS SUCCESSOR CO-TRUSTEES OF THE RESIDUARY TRUST CREATED UNDER THE WILL OF HARRY OKEN, AN ELEVEN AND 86/100 PERCENT (11.86%) UNDIVIDED INTEREST

LEGAL DESCRIPTION:

LOT 1 OF TRACT NO. 22198, IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 791 PAGES 19 AND 20 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

EXCEPT FROM THAT PORTION OF THE NORTHWESTERLY 159.87 FEET OF SAID LOT LYING SOUTHWESTERLY OF A LINE THAT BEARS SOUTH 62° 09' 41" EAST FROM A POINT IN THE NORTHWESTERLY LINE THEREOF DISTANT THEREON NORTH 27° 59' 15" EAST 55.05 FEET FROM THE MOST WESTERLY CORNER OF SAID LOT, ALL MINERALS, OILS, GASES AND OTHER HYDROCARBONS BY WHATSOEVER NAME KNOWN, THAT MAY BE WITHIN OR UNDER SAID PORTION, WITHOUT, HOWEVER, THE RIGHT TO DRILL, DIG OR MINE THROUGH THE SURFACE THEREOF, AS EXCEPTED IN THE DEED FROM THE STATE OF CALIFORNIA RECORDED AUGUST 11, 1960 AS INSTRUMENT NO. 3622 , IN BOOK D-941 PAGE 897 OFFICIAL RECORDS.

ALSO EXCEPT FROM THE REMAINING PORTION OF SAID LOT, ALL OIL, GAS AND OTHER HYDROCARBONS AND MINERALS UNDERLYING SAID PORTION OF SAID LOT, AS GRANTED TO MADELINE T. CRAWFORD, MARIAN T. GARRETT AND HELEN T. HUTCHINS, EACH AS TO A ONE-THIRD INTEREST, BY DEED RECORDED NOVEMBER 25, 1964 AS INSTRUMENT NO. 4265, IN BOOK D-2711 PAGE 699 OFFICIAL RECORDS.

NOTES CORRESPONDING TO SCHEDULE "B":

A-C: TAXES.

1. THE FACT THAT THE OWNERSHIP OF SAID LAND DOES NOT INCLUDE RIGHTS OF ACCESS TO OR FROM THE STREET, HIGHWAY, OR FREEWAY ABUTTING SAID LAND, SUCH RIGHTS HAVING BEEN RELINQUISHED BY THAT CERTAIN DOCUMENT RECORDED APRIL 28, 1960 AS INSTRUMENT NO. 1614, IN BOOK D828, PAGE OF OFFICIAL RECORDS. (AFFECTS SUBJECT PROPERTY AND IS PLOTTED HEREON)

   AND RESERVED BY THE STATE OF CALIFORNIA IN DEED RECORDED AUGUST 11, 1960 AS INSTRUMENT NO. 3622 IN BOOK D941, PAGE 897 , OF OFFICIAL RECORDS.

2. A COVENANT AND AGREEMENT RECORDED OCTOBER 19, 1960 AS INSTRUMENT NO. 3982, IN BOOK M629, PAGE 71, OF OFFICIAL RECORDS.

3. A COVENANT AND AGREEMENT RECORDED DECEMBER 5, 1961 AS INSTRUMENT NO. 3320, IN BOOK M908, PAGE 419 , OF OFFICIAL RECORDS.

4. (4) AN EASEMENT IN FAVOR OF THE CITY OF LOS ANGELES FOR PUBLIC UTILITIES AND RIGHTS INCIDENTAL THERETO AS DELINEATED OR AS OFFERED FOR DEDICATION, ON THE MAP OF TRACT NO. 22198. (AFFECTS SUBJECT PROPERTY AND IS PLOTTED HEREON)

5. THE FACT THAT SAID LAND IS INCLUDED WITHIN THE CENTRAL BUSINESS DISTRICT REDEVELOPMENT PROJECT AREA, AS DESCRIBED IN THE DOCUMENTS RECORDED JULY 22, 1975 AS INSTRUMENT NO. 3675 , AND RECORDED JULY 30, 1975 AS INSTRUMENT NO. 3968 , BOTH OF OFFICIAL RECORDS.

6. A COVENANT AND AGREEMENT RECORDED JUNE 26, 1978 AS INSTRUMENT NO. 78-690320 , OF OFFICIAL RECORDS.

7. (7) AN EASEMENT IN FAVOR OF THE CITY OF LOS ANGLES FOR CONVEYING AND DISTRIBUTING WATER AND RIGHTS INCIDENTAL THERETO AS SET FORTH IN A DOCUMENT RECORDED MARCH 9, 1979 AS INSTRUMENT NO. 79-270297, OF OFFICIAL RECORDS. AFFECTS SUBJECT PROPERTY AND IS PLOTTED HEREON)

8. A COVENANT AND AGREEMENT RECORDED SEPTEMBER 4, 1984 AS INSTRUMENT NO. 84-1061929 , OF OFFICIAL RECORDS.

9. A COVENANT AND AGREEMENT RECORDED OCTOBER 1, 1984 AS INSTRUMENT NO. 84-1182551 , OF OFFICIAL RECORDS.

10. A COVENANT AND AGREEMENT RECORDED OCTOBER 1, 1984 AS INSTRUMENT NO. 84-1182552 , OF OFFICIAL RECORDS.

11. THE FACT THAT SAID LAND IS INCLUDED WITHIN THE CITY CENTER REDEVELOPMENT PROJECT AREA REDEVELOPMENT PROJECT AREA, AS DESCRIBED IN THE DOCUMENT RECORDED NOVEMBER 30, 2007 AS INSTRUMENT NO. 2007263649 , OF OFFICIAL RECORDS.

12. A DEED OF TRUST RECORDED DECEMBER 1, 2010 AS INSTRUMENT NO. 2010-1754477 , OF OFFICIAL RECORDS.

    AN ASSIGNMENT OF THE BENEFICIAL INTEREST UNDER SAID DEED OF TRUST RECORDED FEBRUARY 23, 2011 AS INSTRUMENT NO. 2011-0282819 , OF OFFICIAL RECORDS.

13. AN ASSIGNMENT OF LESSOR'S INTEREST RECORDED DECEMBER 1, 2010 AS INSTRUMENT NO. 2010-1754478 , OF OFFICIAL RECORDS.

    OF CERTAIN OF THE LESSOR'S INTERESTS UNDER LEASES REFERRED THEREIN, WHICH ASSIGNMENT RECITES, AMONG OTHER THINGS, THAT IT IS GIVEN AS ADDITIONAL SECURITY FOR THE DEED OF TRUST RECORDED DECEMBER 1, 2010 AS INSTRUMENT NO. 2010-1754477 , OF OFFICIAL RECORDS.

    AN ASSIGNMENT RECORDED FEBRUARY 23, 2011 AS INSTRUMENT NO. 2011-0282819, OF OFFICIAL RECORDS.

14. TITLE COMPANY STATEMENT.

15. WATER RIGHTS, CLAIMS OR TITLE TO WATER, WHETHER OR NOT DISCLOSED BY THE PUBLIC RECORDS.

16. TITLE COMPANY STATEMENT.

17. TITLE COMPANY STATEMENT.

FLOOD NOTE:

BY GRAPHIC PLOTTING ONLY, THIS PROPERTY IS IN ZONE "X" OF THE FLOOD INSURANCE RATE MAP, COMMUNITY PANEL NO. 06037C1620F, WHICH BEARS AN EFFECTIVE DATE OF 09/26/2008 AND IS NOT IN A SPECIAL FLOOD HAZARD AREA.

SITE RESTRICTIONS:

THE SURVEYOR WAS NOT PROVIDED WITH ZONING INFORMATION PURSUANT TO TABLE A ITEM NO. 6(B).

BASIS OF BEARINGS:

THE BEARING NORTH 62°09'41" WEST BEING THE CENTERLINE OF VENICE BOULEVARD AS SHOWN BY MAP ON FILE IN BOOK 791, PAGE 19 & 20 OF MAPS, RECORDS OF LOS ANGELES COUNTY, WAS USED AS THE BASIS OF BEARINGS FOR THIS SURVEY.

MONUMENT & ESTABLISHMENT NOTES:

- ● – FOUND MONUMENT AS NOTED
- ( ) – INDICATES RECORD DATA PER
- * – INDICATES CALC'D DISTANCE
- R1 – RECORD MAP INFO

PARKING STALLS:

49 ROOFTOP STALLS
12 SURFACE STALLS
2 HANDICAP STALLS
63 TOTAL STALLS

UTILITY NOTE:

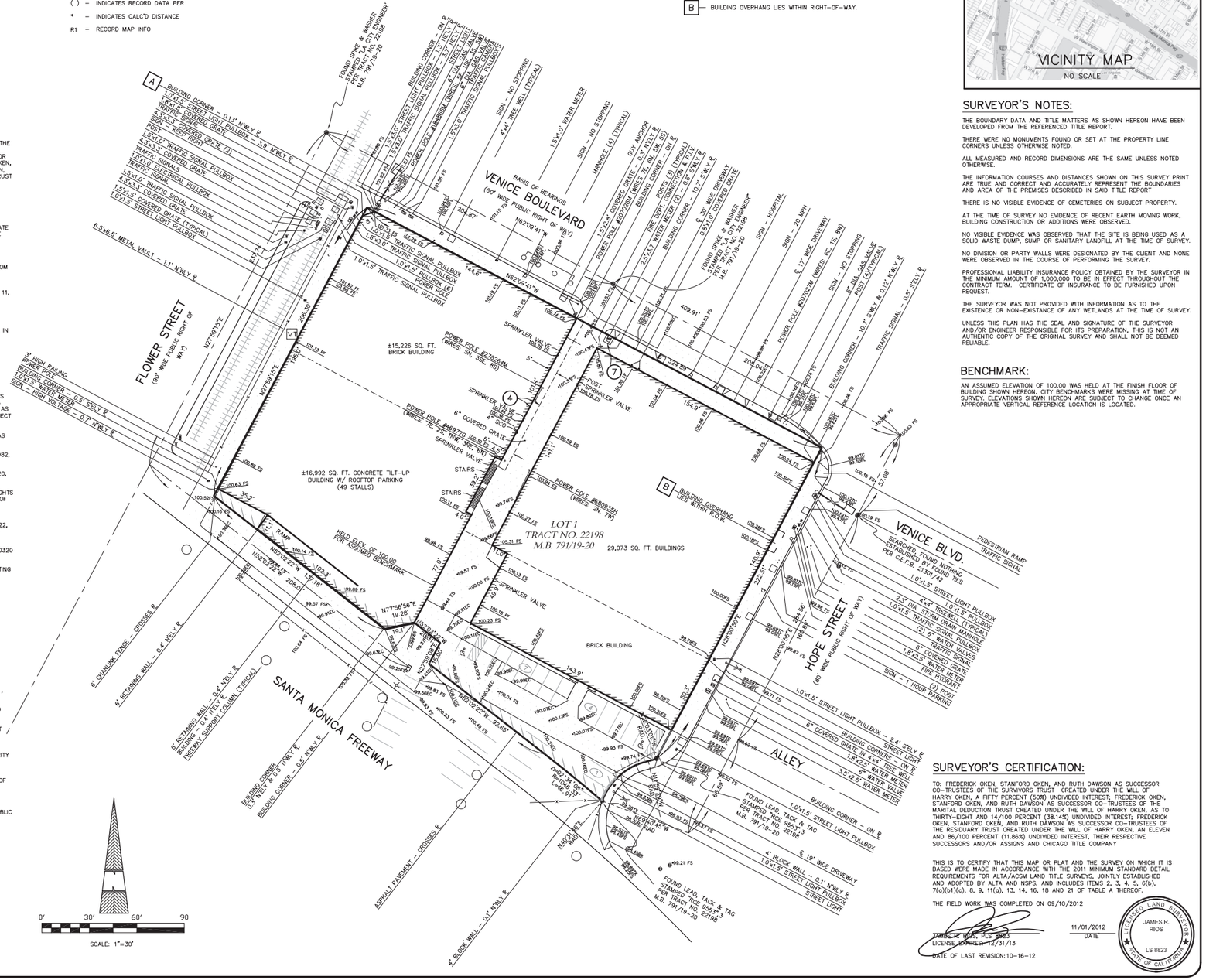
BASED ON VISUAL OBSERVATION, THE SUBJECT SITE IS SERVICED BY ALL THE NECESSARY UTILITIES REQUIRED TO MAINTAIN NORMAL OPERATION.

STATEMENT OF ENCROACHMENTS:

* THIS IS A LISTING OF OBSERVED IMPROVEMENTS THAT CROSS PROPERTY LINES. STATEMENT OF OWNERSHIP OR POSSESSION IS NOT THE INTENT OF THIS LISTING.

A – BUILDING CORNER LIES 0.13' NORTHWESTERLY OF PROPERTY LINE.

B – BUILDING OVERHANG LIES WITHIN RIGHT-OF-WAY.



SURVEYOR'S NOTES:

THE BOUNDARY DATA AND TITLE MATTERS AS SHOWN HEREON HAVE BEEN DEVELOPED FROM THE REFERENCED TITLE REPORT.

THERE WERE NO MONUMENTS FOUND OR SET AT THE PROPERTY LINE CORNERS UNLESS OTHERWISE NOTED.

ALL MEASURED AND RECORD DIMENSIONS ARE THE SAME UNLESS NOTED OTHERWISE.

THE INFORMATION COURSES AND DISTANCES SHOWN ON THIS SURVEY PRINT ARE TRUE AND CORRECT AND ACCURATELY REPRESENT THE BOUNDARIES AND AREA OF THE PREMISES DESCRIBED IN SAID TITLE REPORT

THERE IS NO VISIBLE EVIDENCE OF CEMETERIES ON SUBJECT PROPERTY.

AT THE TIME OF SURVEY NO EVIDENCE OF RECENT EARTH MOVING WORK, BUILDING CONSTRUCTION OR ADDITIONS WERE OBSERVED.

NO VISIBLE EVIDENCE WAS OBSERVED THAT THE SITE IS BEING USED AS A SOLID WASTE DUMP, SUMP OR SANITARY LANDFILL AT THE TIME OF SURVEY.

NO DIVISION OR PARTY WALLS WERE DESIGNATED BY THE CLIENT AND NONE WERE OBSERVED IN THE COURSE OF PERFORMING THE SURVEY.

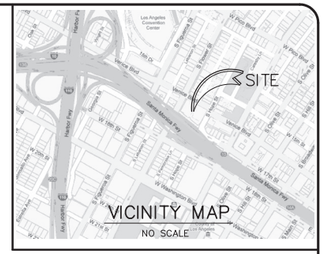
PROFESSIONAL LIABILITY INSURANCE POLICY OBTAINED BY THE SURVEYOR IN THE MINIMUM AMOUNT OF 1,000,000 TO BE IN EFFECT THROUGHOUT THE CONTRACT TERM. CERTIFICATE OF INSURANCE TO BE FURNISHED UPON REQUEST.

THE SURVEYOR WAS NOT PROVIDED WITH INFORMATION AS TO THE EXISTENCE OR NON-EXISTANCE OF ANY WETLANDS AT THE TIME OF SURVEY.

UNLESS THIS PLAN HAS THE SEAL AND SIGNATURE OF THE SURVEYOR AND/OR ENGINEER RESPONSIBLE FOR ITS PREPARATION, THIS IS NOT AN AUTHENTIC COPY OF THE ORIGINAL SURVEY AND SHALL NOT BE DEEMED RELIABLE.

BENCHMARK:

AN ASSUMED ELEVATION OF 100.00 WAS HELD AT THE FINISH FLOOR OF BUILDING SHOWN HEREON. CITY BENCHMARKS WERE MISSING AT TIME OF SURVEY. ELEVATIONS SHOWN HEREON ARE SUBJECT TO CHANGE ONCE AN APPROPRIATE VERTICAL REFERENCE LOCATION IS LOCATED.



SURVEYOR'S CERTIFICATION:

TO: FREDERICK OKEN, STANFORD OKEN, AND RUTH DAWSON AS SUCCESSOR CO-TRUSTEES OF THE SURVIVORS TRUST CREATED UNDER THE WILL OF HARRY OKEN, A FIFTY PERCENT (50%) UNDIVIDED INTEREST; FREDERICK OKEN, STANFORD OKEN, AND RUTH DAWSON AS SUCCESSOR CO-TRUSTEES OF THE MARITAL DEDUCTION TRUST CREATED UNDER THE WILL OF HARRY OKEN, AS TO THIRTY-EIGHT AND 14/100 PERCENT (38.14%) UNDIVIDED INTEREST; FREDERICK OKEN, STANFORD OKEN, AND RUTH DAWSON AS SUCCESSOR CO-TRUSTEES OF THE RESIDUARY TRUST CREATED UNDER THE WILL OF HARRY OKEN, AN ELEVEN AND 86/100 PERCENT (11.86%) UNDIVIDED INTEREST, THEIR RESPECTIVE SUCCESSORS AND/OR ASSIGNS AND CHICAGO TITLE COMPANY

THIS IS TO CERTIFY THAT THIS MAP OR PLAT AND THE SURVEY ON WHICH IT IS BASED WERE MADE IN ACCORDANCE WITH THE 2011 MINIMUM STANDARD DETAIL REQUIREMENTS FOR ALTA/ACSM LAND TITLE SURVEYS, JOINTLY ESTABLISHED AND ADOPTED BY ALTA AND NSPS, AND INCLUDES ITEMS 2, 3, 4, 5, 6(b), 7(a)(b1)(c), 8, 9, 11(a), 13, 14, 16, 18 AND 21 OF TABLE A THEREOF.

THE FIELD WORK WAS COMPLETED ON 09/10/2012

JAMES R. RIOS, PLS 8823
LICENSE EXPIRES: 12/31/13

11/01/2012
DATE

DATE OF LAST REVISION: 10-16-12

LICENSED LAND SURVEYOR JAMES R. RIOS LS 8823 STATE OF CALIFORNIA

REVISIONS				ACCEPTED AND APPROVED FOR CONSTRUCTION	
NO.	DESCRIPTION	DATE	APP'D		DATE
				OWNER BY	
1	REVISE SPOT ELEVATIONS	11/01/12	J.R.R.	TENANT BY	DATE
				CONTRACTOR BY	DATE

THIS DRAWING MAY NOT BE USED FOR CONSTRUCTION WITHOUT THE ABOVE APPROVALS NOR WITHOUT THE REQUIRED PERMITS BEING OBTAINED.

PROJECT ENGINEER:
O.K.O. ENGINEERING INC.
CIVIL ENGINEERS/SURVEYORS/STRUCTURAL/ & CAD SPECIALISTS
23671 BIRTCHER DRIVE
LAKE FOREST, CALIFORNIA 92630
949/597-3577
FAX 949/597-3579

SHEET TITLE: ALTA/ACSM LAND TITLE SURVEY
SITE: 1601-1625 SOUTH HOPE STREET & 1600-1616 SOUTH FLOWER STREET
LOS ANGELES, CALIFORNIA

DATE 09/12/12
SCALE 1"=30'
DRAWN J.R.R.
CHECKED J.R.R.

SHEET NO. 1 OF 1

South Park Towers

Los Angeles, CA

Venice Hope Group, LLC

Existing Survey

May 29, 2025

444 S Flower Street - Suite 1220
Los Angeles, California 90071
213.614.6050
213.614.6051 fax
www.tsminc.com

VENICE BLVD.

S. FLOWER ST.

S. HOPE ST.

1

1

BUILDING STORAGE

LAUNDRY

H.K.

LINEN

ELEV

EMP. BREAK

M

W

ELEC.

LONG TERM BIKE PARK (30)

STOR

FIRE PUMP

WATER STORAGE

DWP VAULT

DOMESTIC WATER PUMP

Residential / Building Storage

DWP Vault

Water Storage

Gas Meter Area

Fire Pump Room

Long-Term Bike Parking (120)

100 sf Work Space

Domestic Water Pump Area

ALLEY

I-10 FREEWAY

South Park Towers

Los Angeles, CA

Venice Hope Group, LLC

Basement Level Plan

4

0 15 30 60 ft

May 29, 2025

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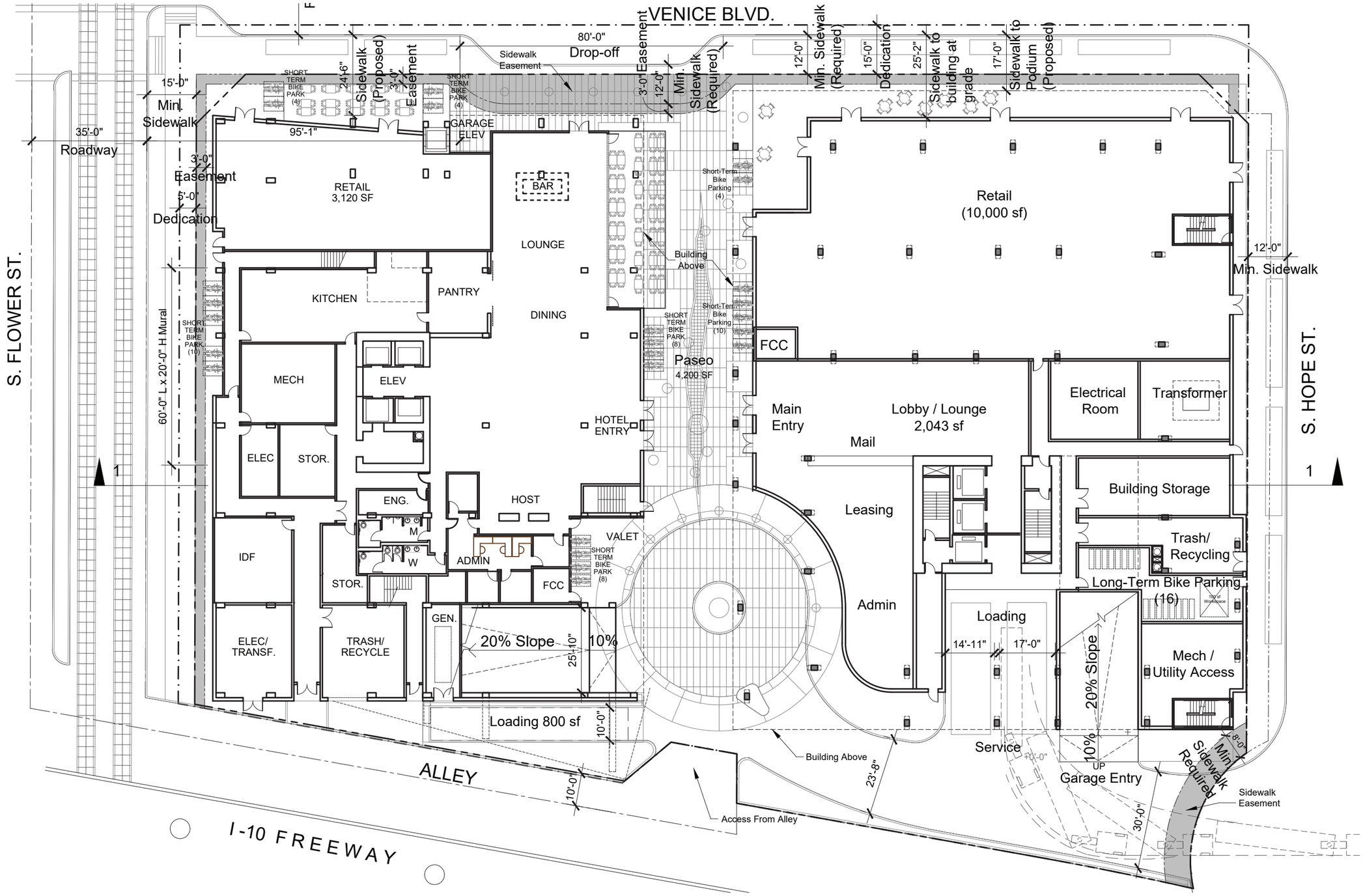

South Park Towers

Los Angeles, CA

Venice Hope Group, LLC

Ground Level Plan

0 15 30 60 ft

May 29, 2025

5

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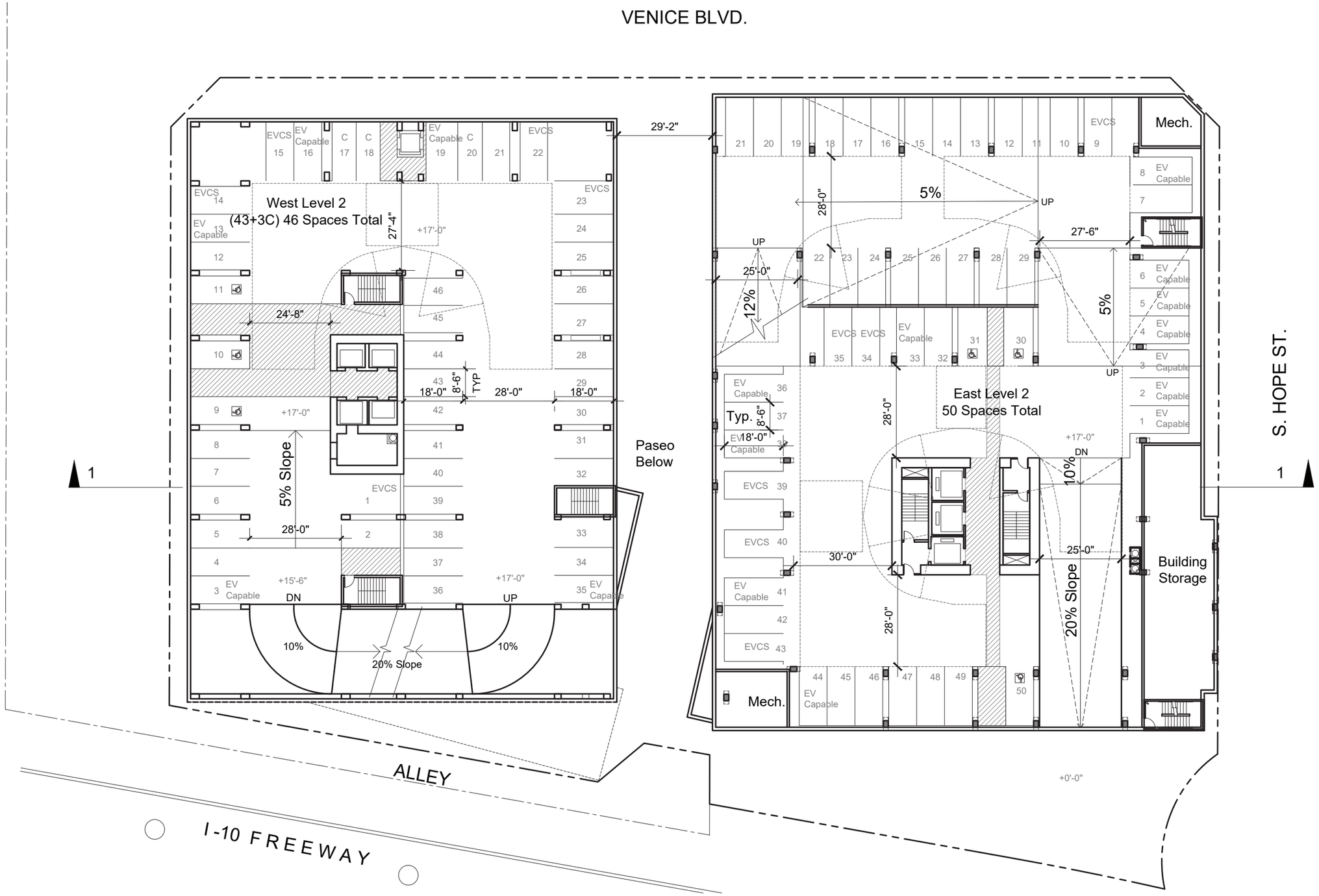

South Park Towers

Los Angeles, CA

Venice Hope Group, LLC

2nd Level Plan

0 15 30 60 ft

6

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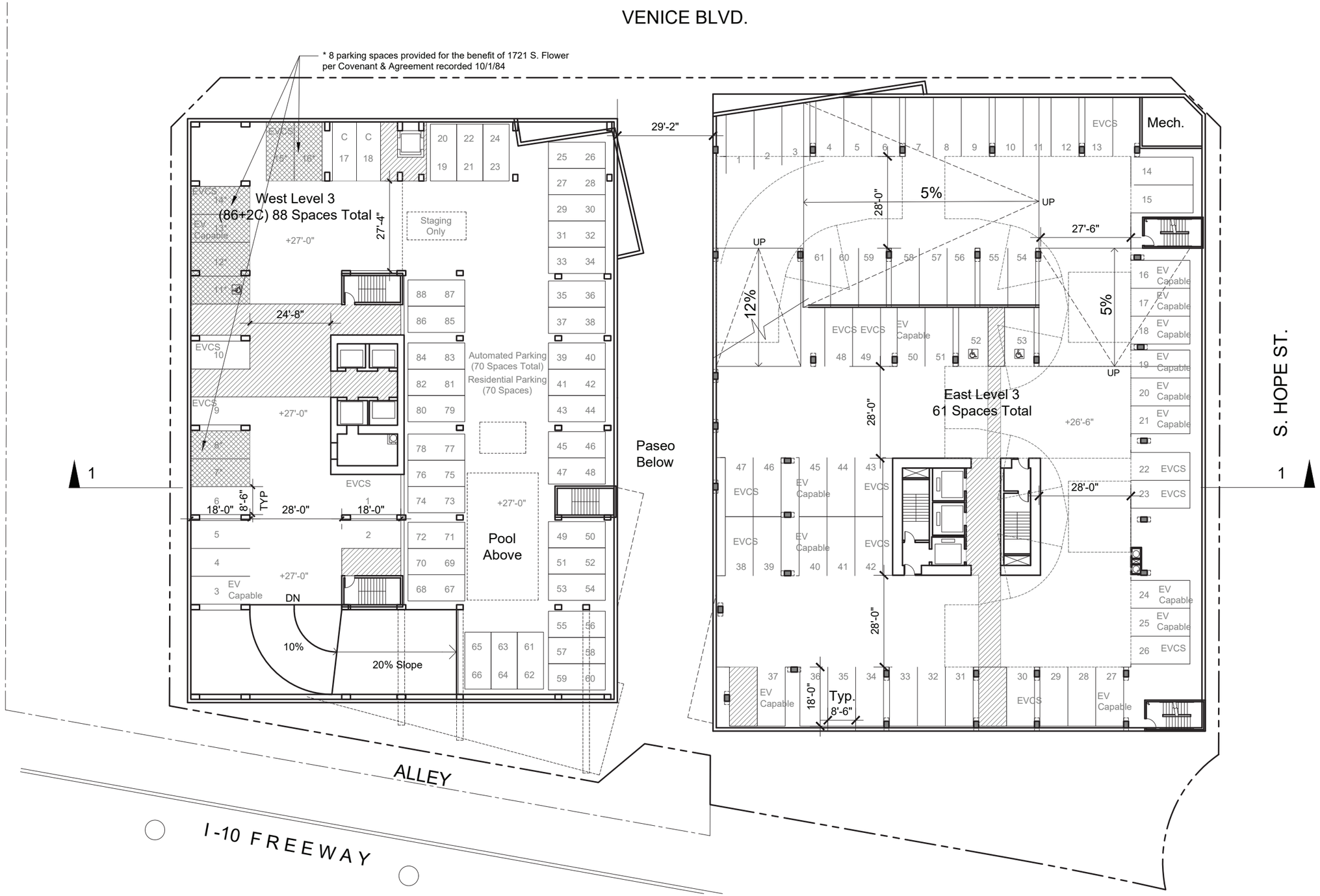
May 29, 2025



South Park Towers

Los Angeles, CA

Venice Hope Group, LLC

3rd Level Plan

0 15 30 60 ft

May 29, 2025

7

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VENICE BLVD.

S. FLOWER ST.

S. HOPE ST.

1

1

29'-2"

Open to Below

Paseo Below

Open to Below

12%

DN

EVCS EVCS 1 2 3 4 5 6 7 8 EVCS 9

Mech.

28'-0"

East Level 4
38 Spaces Total

+36'-0"

28'-0"

10 EVCS
11
12 EVCS
13 EVCS

38 37 36 35 34
EVCS EVCS
EVCS EVCS
29 30 31 32 33

28'-0"

14 EV Capable
15 EV Capable
16 EVCS

28 27 26 25 24 23 22 21 20 19 18 17

18'-0"

Typ. 8'-6"

ALLEY

I-10 FREEWAY

South Park Towers

Los Angeles, CA

Venice Hope Group, LLC

4th Level Plan

0 15 30 60 ft

8

May 29, 2025

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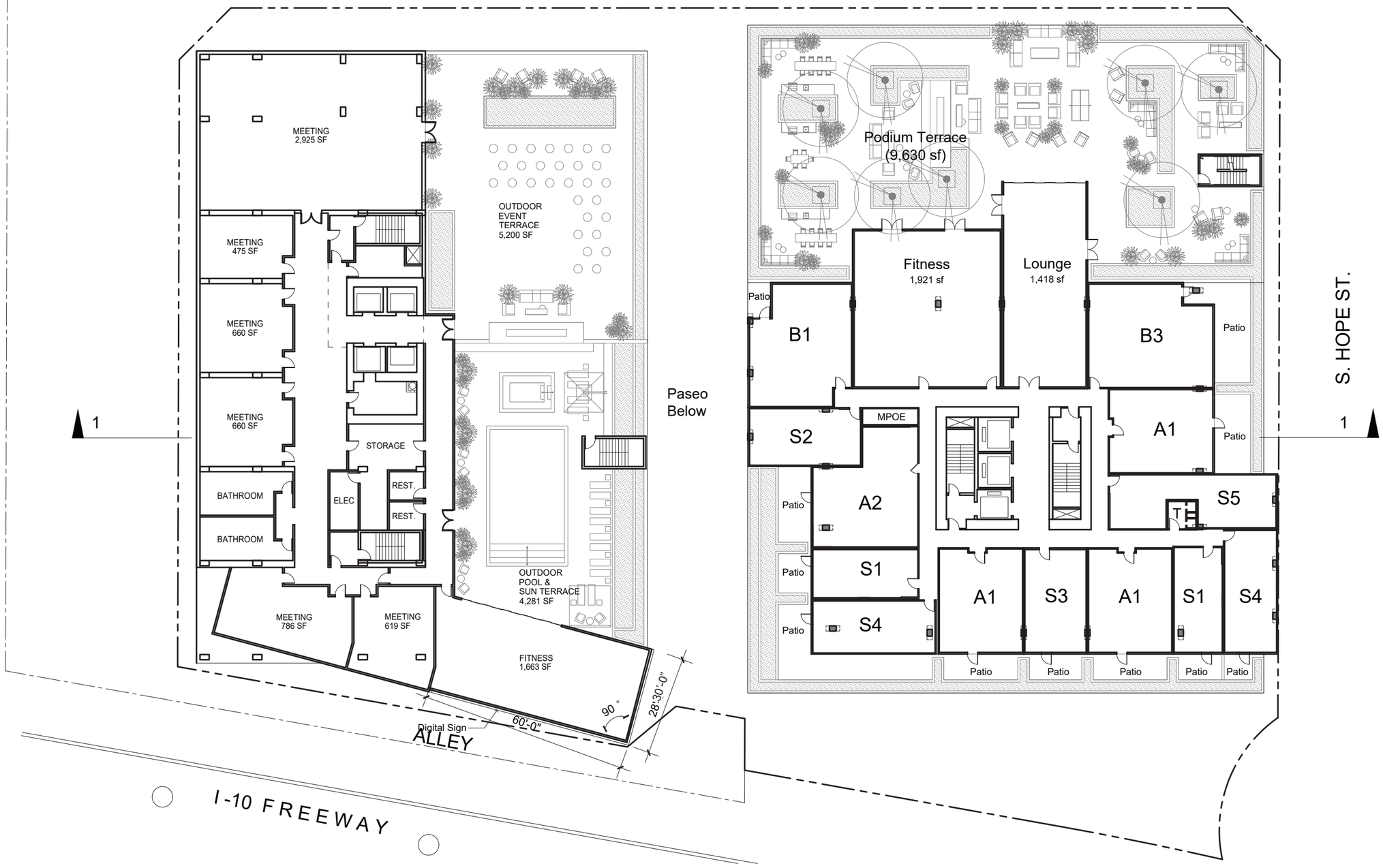
VENICE BLVD.

S. FLOWER ST.

S. HOPE ST.

1

1



Proposed Residential

Unit Type
S1 - Studio
S2 - Studio
S3 - Studio
S4 - Studio
S5 - Studio
A1 - 1-Bedroom
A2 - 1-Bedroom + Den
B1 - 2-Bedroom
B2 - 2-Bedroom
B3 - 2-Bedroom
B4 - 2-Bedroom
PH - 3-Bedroom

Proposed Hotel

Unit Type
Hotel 1
K - King
DQ - Double Queen
Hotel 2
KS - King Suite
QS - Queen Suite
1BD - 1-Bedroom

South Park Towers

Los Angeles, CA

Venice Hope Group, LLC

Podium Level Plan (Level 5)

0 15 30 60 ft

May 29, 2025

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VENICE BLVD.

S. FLOWER ST.

S. HOPE ST.

ALLEY

I-10 FREEWAY

HOTEL 2

HOTEL 1

1

1

QS
QS
QS
QS
QS
KS
KS
STOR
DQ
ELEV
K
ICE
SERVICE
DQ
DQ
DQ
DQ
DQ
ELEC/IDF
DQ
K
DQ
K
DQ

B1
A1
S3
A1
B3
S2
MPOE
A1
A2
TR
S5
B4
A1
S3
A1
B2

Proposed Residential

Unit Type
S1 - Studio
S2 - Studio
S3 - Studio
S4 - Studio
S5 - Studio
A1 - 1-Bedroom
A2 - 1-Bedroom + Den
B1 - 2-Bedroom
B2 - 2-Bedroom
B3 - 2-Bedroom
B4 - 2-Bedroom
PH - 3-Bedroom

Proposed Hotel

Unit Type
Hotel 1
K - King
DQ - Double Queen
Hotel 2
KS - King Suite
QS - Queen Suite
1BD - 1-Bedroom

South Park Towers

Los Angeles, CA

Venice Hope Group, LLC

6th, 7th, and 8th Level Plan

0 15 30 60 ft

10

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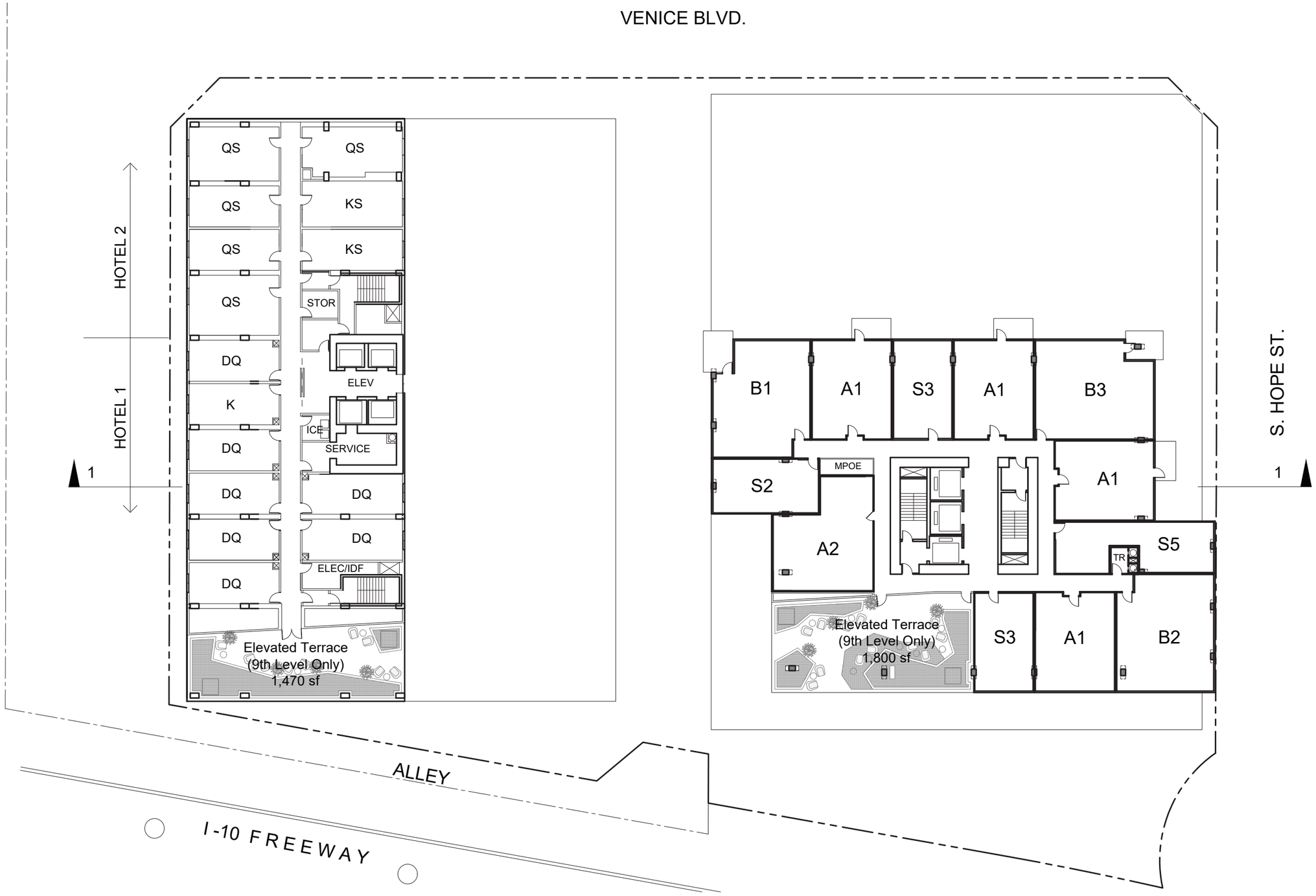
May 29, 2025



Proposed Residential

Unit Type
S1 - Studio
S2 - Studio
S3 - Studio
S4 - Studio
S5 - Studio
A1 - 1-Bedroom
A2 - 1-Bedroom + Den
B1 - 2-Bedroom
B2 - 2-Bedroom
B3 - 2-Bedroom
B4 - 2-Bedroom
PH - 3-Bedroom

Proposed Hotel

Unit Type
Hotel 1
K - King
DQ - Double Queen
Hotel 2
KS - King Suite
QS - Queen Suite
1BD - 1-Bedroom

South Park Towers

Los Angeles, CA

Venice Hope Group, LLC

9th and 10th Level Plan

0 15 30 60 ft

11

May 29, 2025

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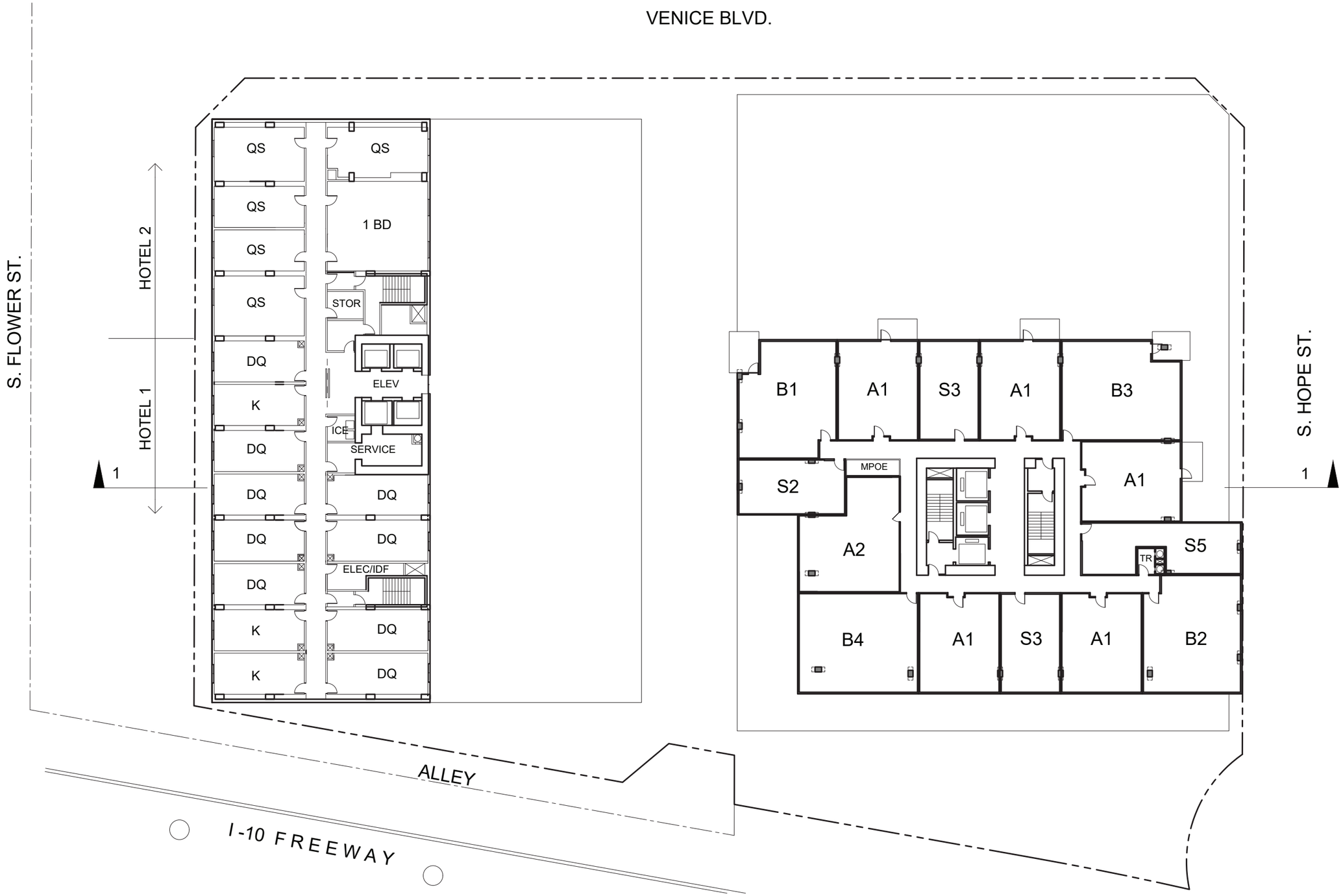

Proposed Residential

Unit Type
S1 - Studio
S2 - Studio
S3 - Studio
S4 - Studio
S5 - Studio
A1 - 1-Bedroom
A2 - 1-Bedroom + Den
B1 - 2-Bedroom
B2 - 2-Bedroom
B3 - 2-Bedroom
B4 - 2-Bedroom
PH - 3-Bedroom

Proposed Hotel

Unit Type
Hotel 1
K - King
DQ - Double Queen
Hotel 2
KS - King Suite
QS - Queen Suite
1BD - 1-Bedroom

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Typical Level Plan (Levels 11-21)

0 15 30 60 ft

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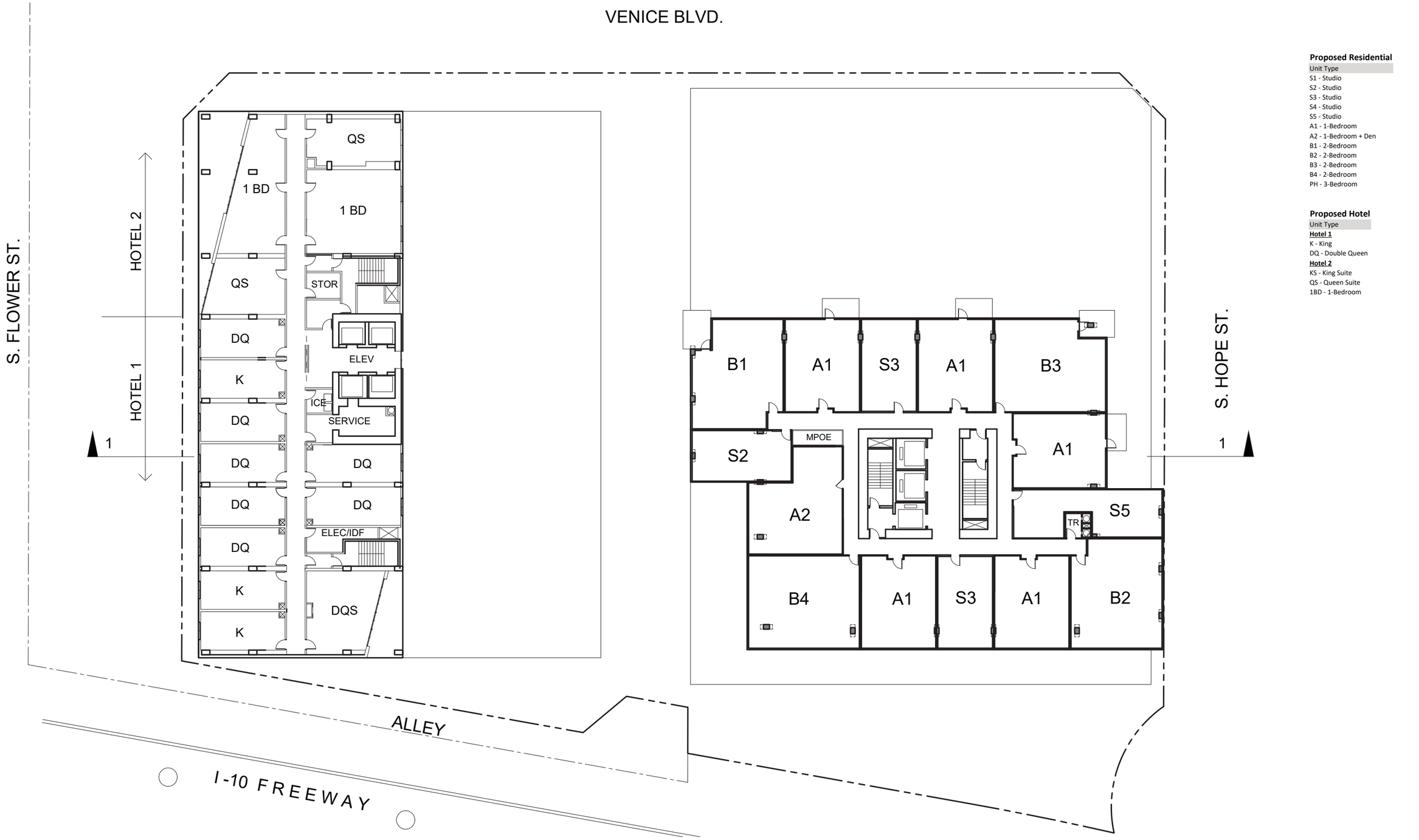

Proposed Residential

Unit Type
S1 - Studio
S2 - Studio
S3 - Studio
S4 - Studio
S5 - Studio
A1 - 1-Bedroom
A2 - 1-Bedroom + Den
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B3 - 2-Bedroom
B4 - 2-Bedroom
PH - 3-Bedroom

Proposed Hotel

Unit Type
Hotel 1
K - King
DQ - Double Queen
Hotel 2
KS - King Suite
QS - Queen Suite
1BD - 1-Bedroom

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22nd Level Plan

0 15 30 60 ft

13

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VENICE BLVD.

S. FLOWER ST.

S. HOPE ST.

1

1

Open to Level
22 Below

Roof Terrace
(5,030 sf)

Pool

Amenity
676 sf

27'-5"

26'-7"

PH1
(1,900sf)

PH2
(1,900sf)

TR

Potential
Toilet and
Shower
Area

PH3
(1,900sf)

ALLEY

I-10 FREEWAY

Proposed Residential

Unit Type
S1 - Studio
S2 - Studio
S3 - Studio
S4 - Studio
S5 - Studio
A1 - 1-Bedroom
A2 - 1-Bedroom + Den
B1 - 2-Bedroom
B2 - 2-Bedroom
B3 - 2-Bedroom
B4 - 2-Bedroom
PH - 3-Bedroom

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23rd Level Plan

0 15 30 60 ft

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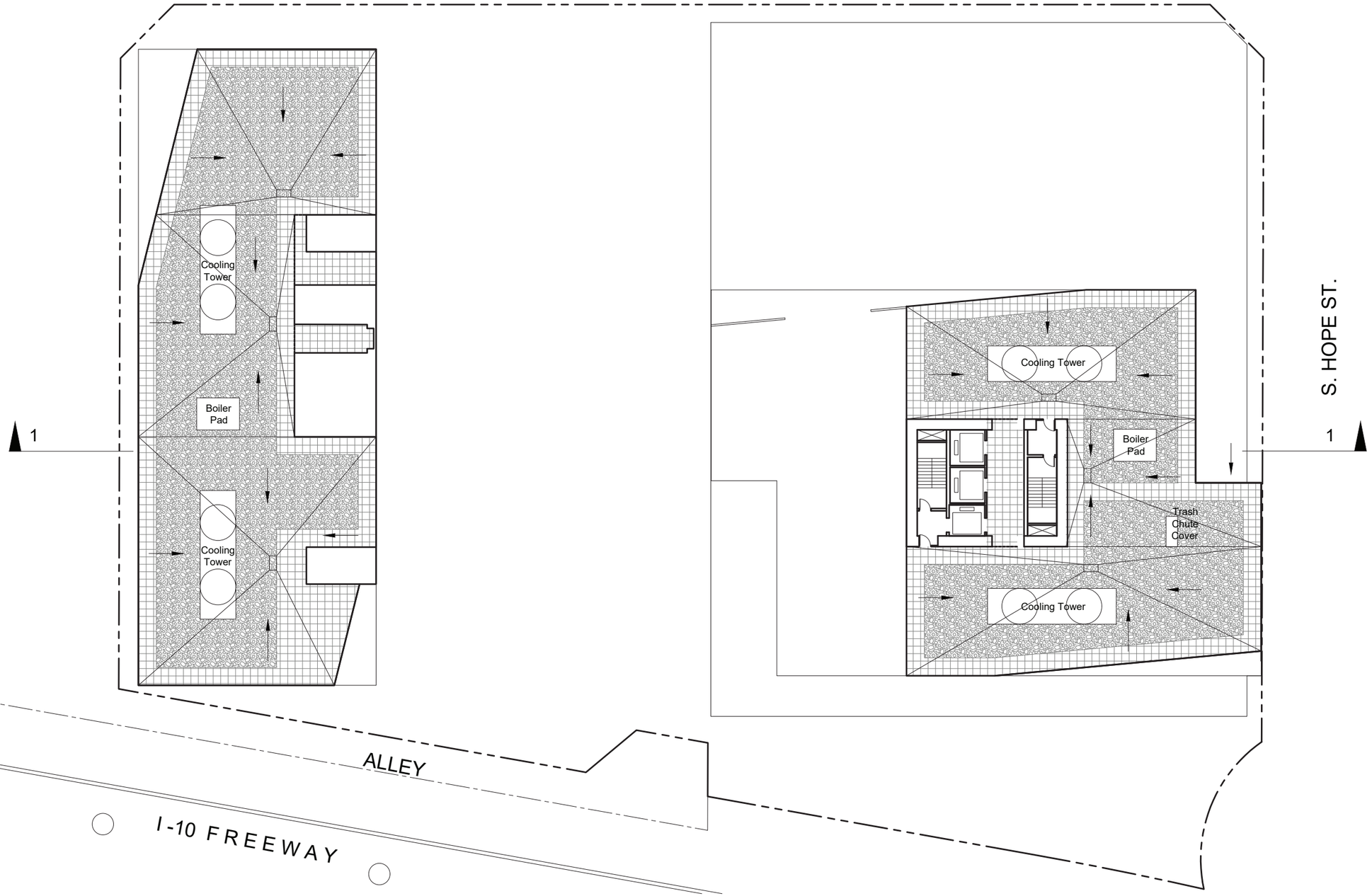
VENICE BLVD.

S. FLOWER ST.

S. HOPE ST.



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Roof Level Plan

0 15 30 60 ft

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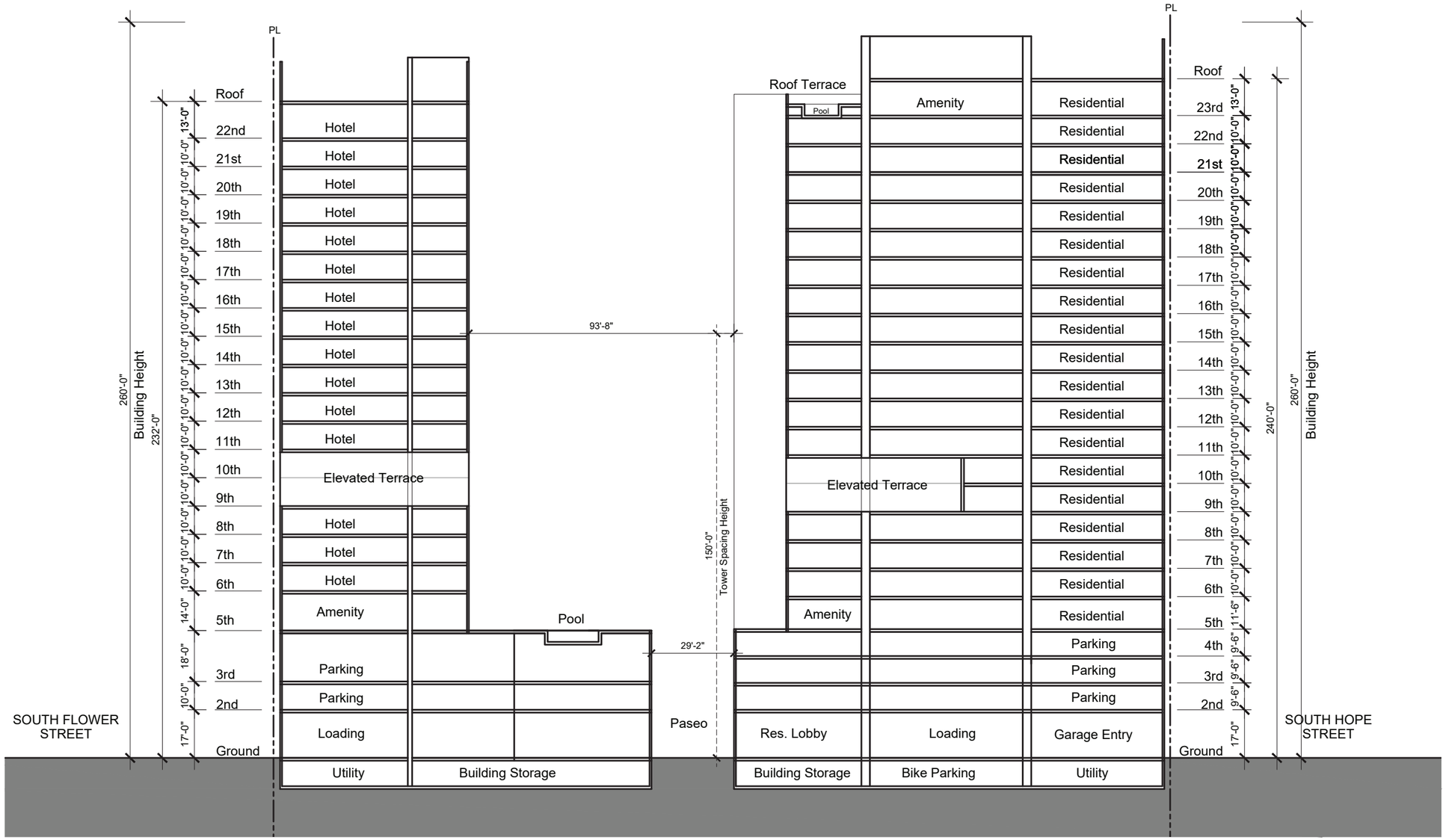

Note: Height defined from lowest grade to highest point of site per LAMC 12.03. Project is one ground lot and height and needs to be measured per LAMC 12.03 for entire site.

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Building Section

0 4 8 16 ft

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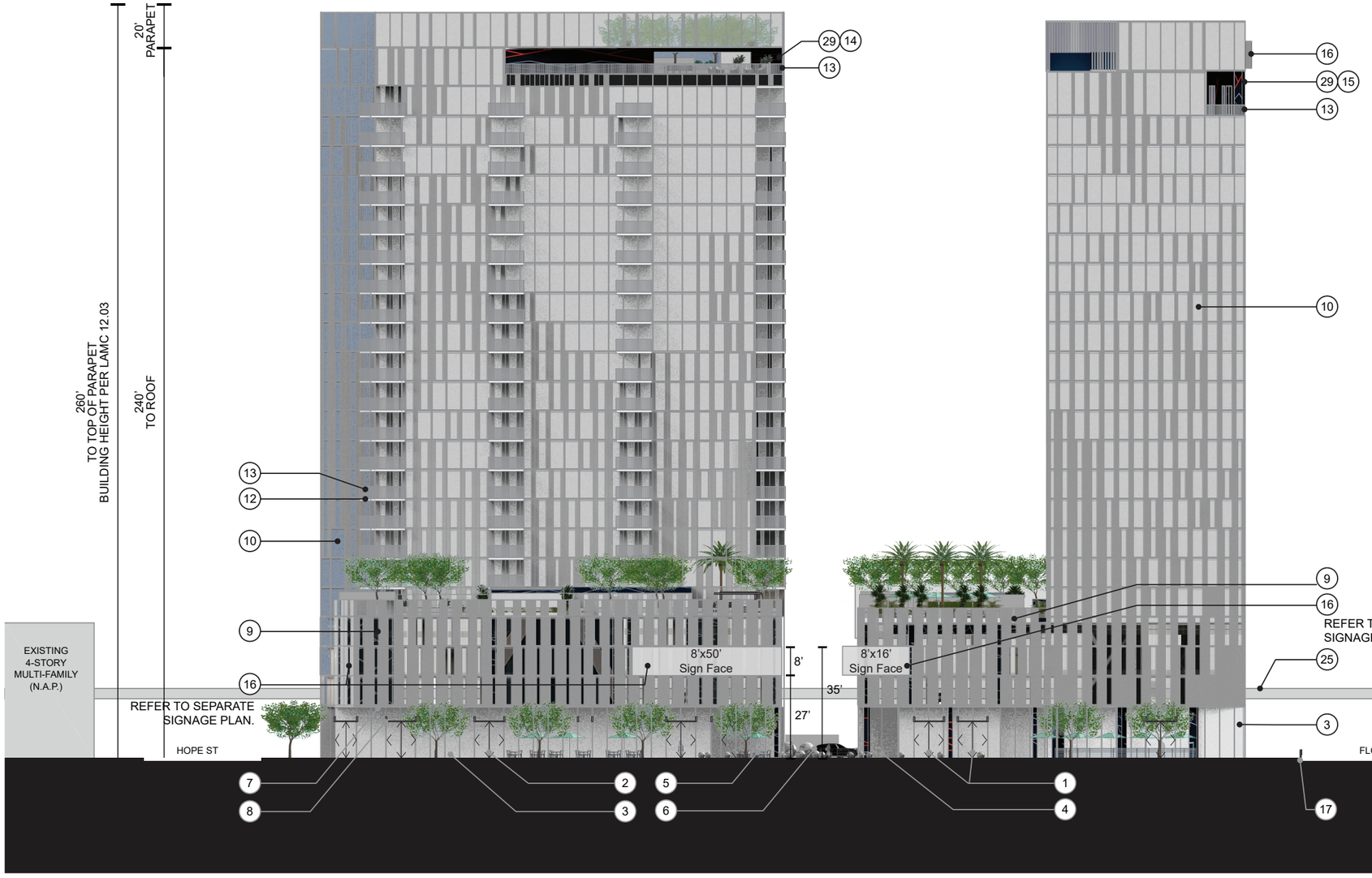

1. LOBBY ENTRANCE
2. RETAIL ENTRANCE
3. RETAIL STOREFRONT
4. HOTEL LOBBY BAR SEATING
5. RETAIL SEATING
6. PASEO
7. RECESSED LIGHTING
8. WALL SCONCE
9. METAL PANEL SCREEN W/ PERFORATED METAL INFILL & EXPANDED MESH (40% OPEN)
10. WINDOW WALL PANEL
11. DIGITAL SIGN
    REFER TO SEPARATE SIGNAGE PLAN
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28. VEHICULAR DROP-OFF
29. PAINTED ARTWORK
30. STREET CROSSING SIGN
31. 60'-0" L X 20'-0" H MURAL

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North Elevation

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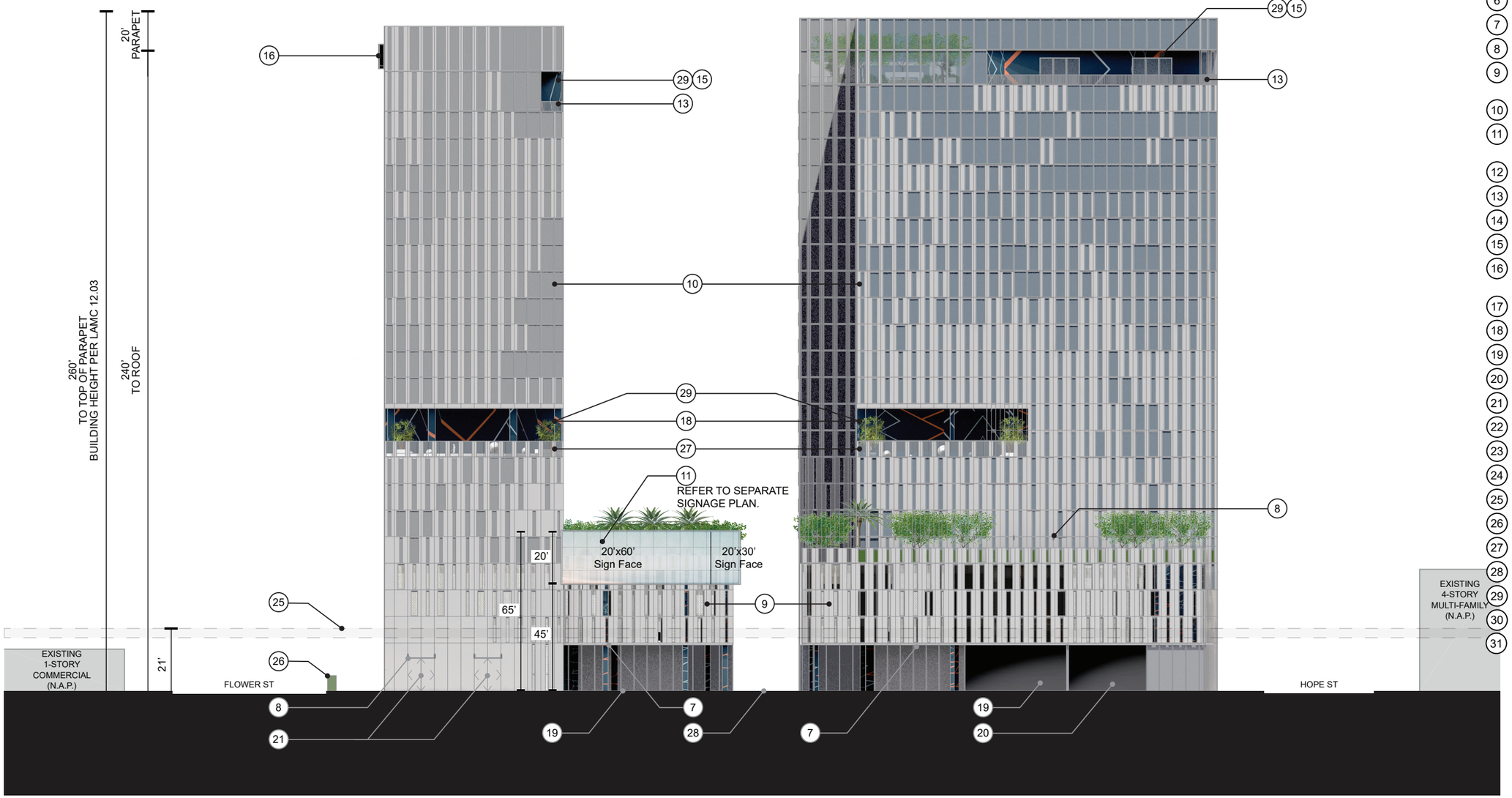

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South Elevation

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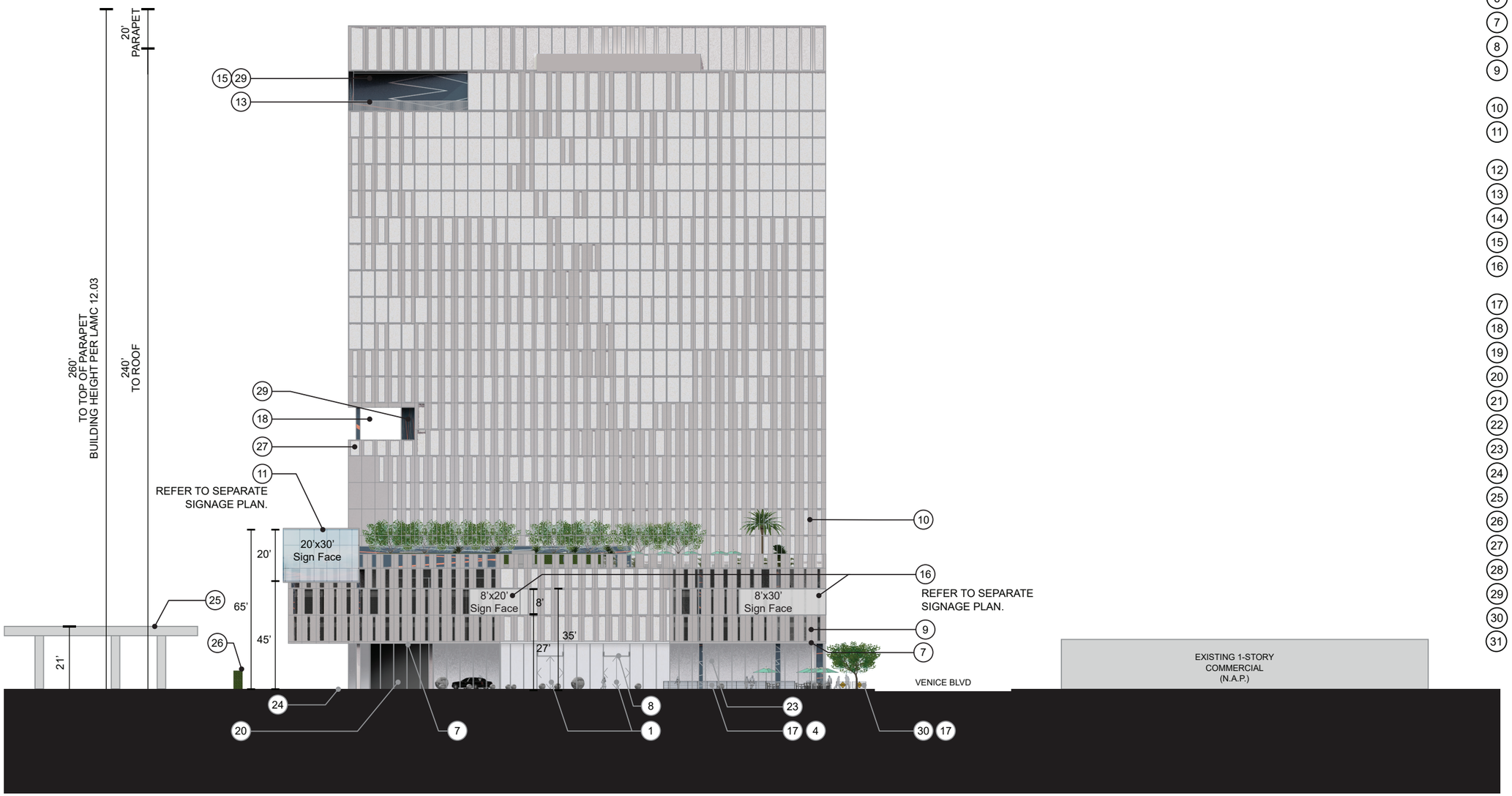

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South Park Towers

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East Elevation - West Tower

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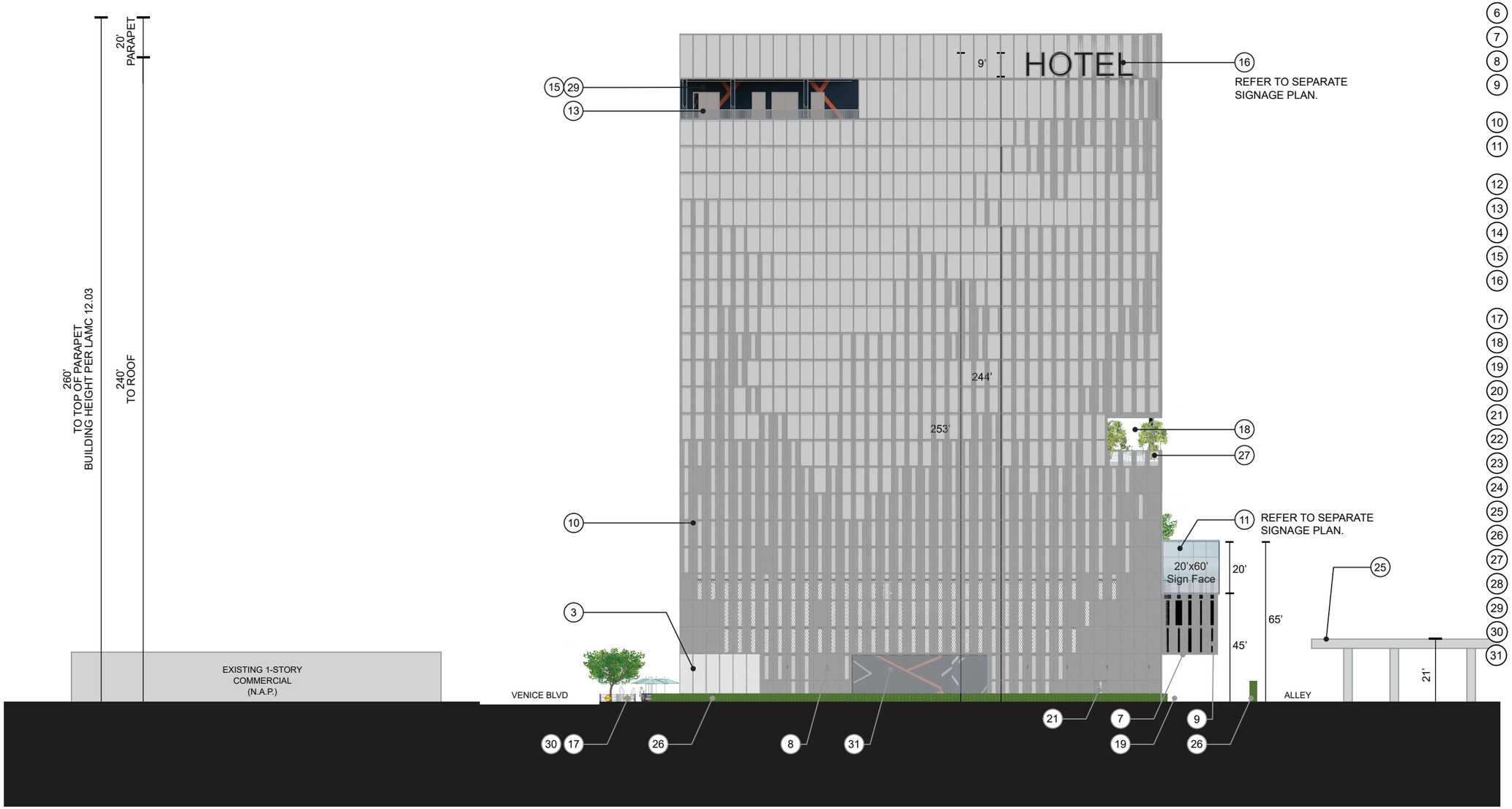

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South Park Towers

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West Elevation - West Tower

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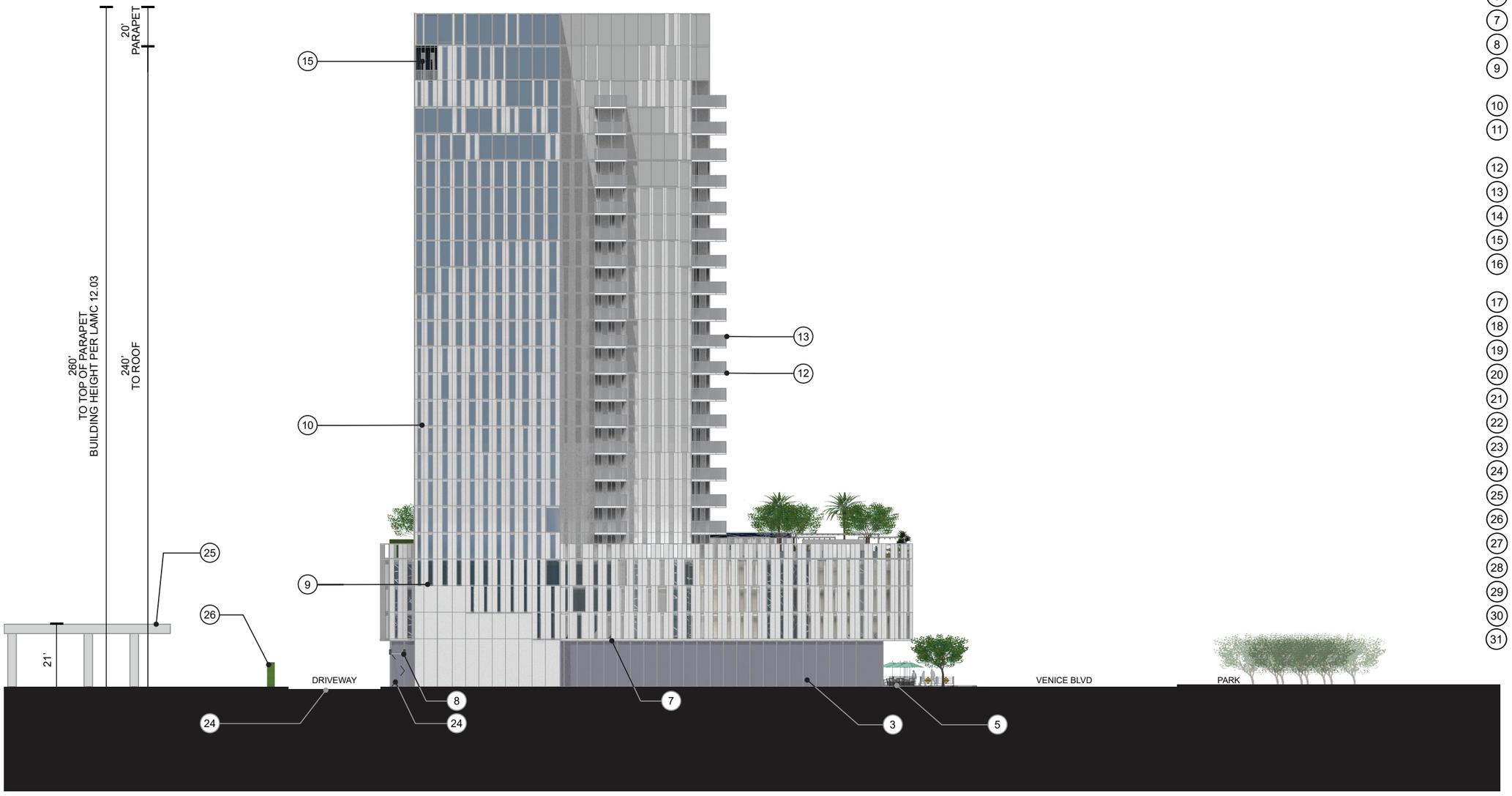

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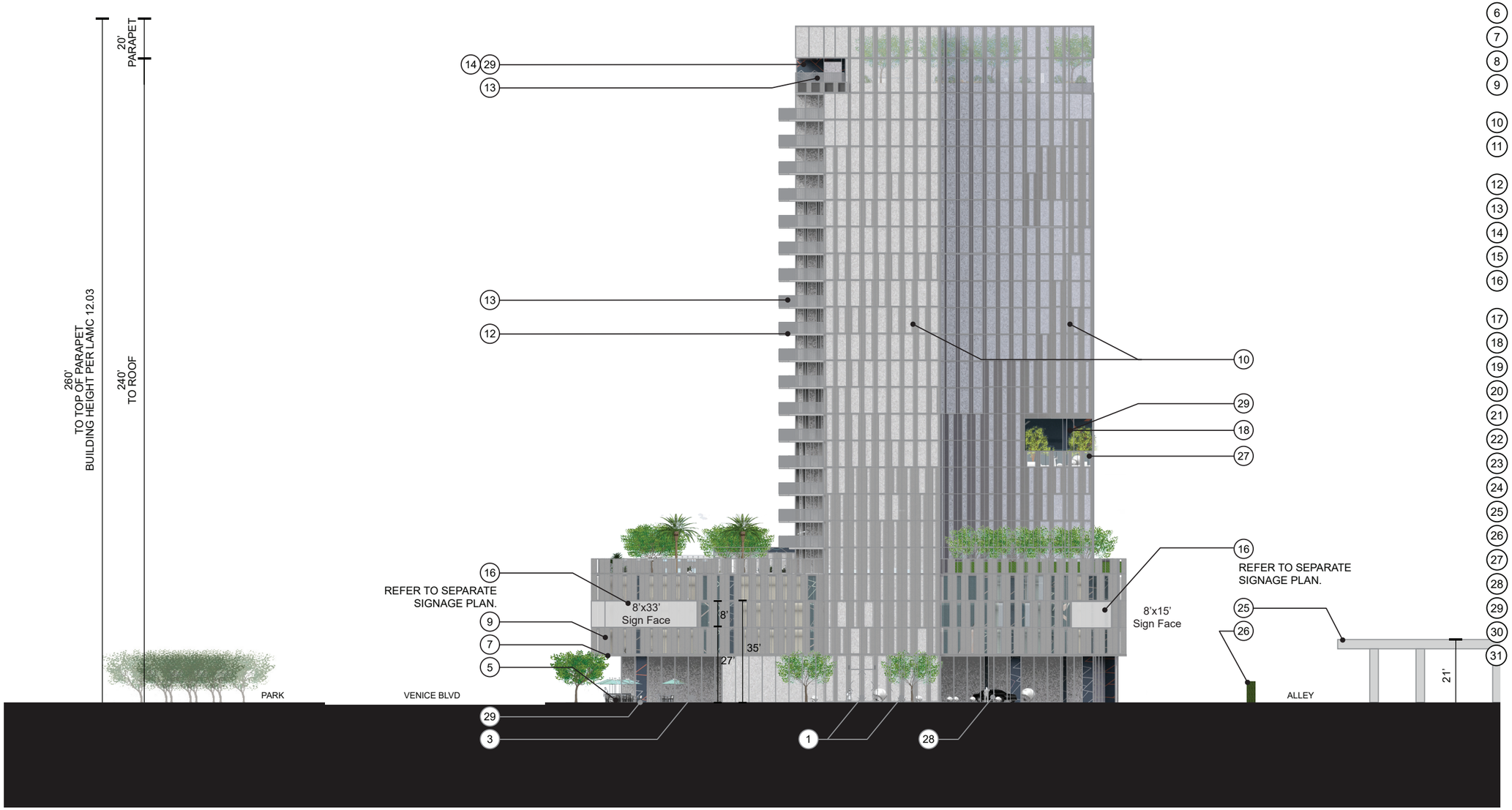

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May 29, 2025

27 GLASS WALL

GLASS GUARDRAIL SYSTEM, 42" HIGH A.F.F. METALLIC GRAY/SILVER, STRUCTURAL GLASS PANEL WITH BRUSHED ALUMINUM METAL TOP RAILING AND FRAME

EXAMPLE

COLOR

23 RETRACTABLE GLASS WALL

ALUMINUM, THERMALLY CONTROLLED SLIDING WINDOW WALL SYSTEM WITH DUAL GLAZED TEMPERED GLASS, & STAINLESS STEEL HARDWARE
FINISH: FACTORY APPLIED
COLOR: METALLIC GRAY/ SILVER

EXAMPLE

COLOR

21 BACK OF HOUSE ENTRY

2" X 6" RECTANGULAR METAL TUBE FRAME WITH DUAL PANE LOW-E ARCHITECTURAL GLASS
FINISH: FACTORY APPLIED
COLOR: METALLIC GRAY/ SILVER

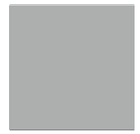
EXAMPLE

COLOR

19 LOADING & SERVICE

2" X 6" RECTANGULAR METAL TUBE FRAME WITH DUAL PANE LOW-E ARCHITECTURAL GLASS
FINISH: FACTORY APPLIED
COLOR: METALLIC GRAY/ SILVER

EXAMPLE

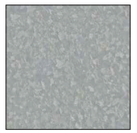


COLOR

17 GUARDRAIL

3" GALVANIZED METAL GUARD RAIL 3FT A.F.F. TO MATCH EXISTING

EXAMPLE



COLOR

13 METAL RAIL

METAL GUARDRAIL SYSTEM, 42" HIGH A.F.F. WITH BRUSHED ALUMINUM METAL FRAME & INFILL PICKET

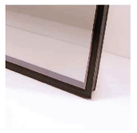
EXAMPLE

COLOR

10 WINDOW WALL PANEL

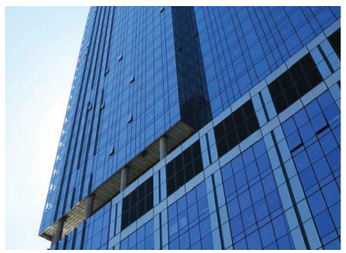
2" X 6" OFFSET GLAZED WINDOW WALL W/ 1" LOW-E, INSULATING GLASS PANELS AND EXTRUDED ALUMINUM, METALLIC GRAY/ SILVER THERMAL FRAMING
PANEL A: 1" INSULATED GLASS - 59% VISIBLE LIGHT TRANSMITTANCE
PANEL B: 1" INSULATED GLASS - 47% VISIBLE LIGHT TRANSMITTANCE

DETAIL



PANEL A

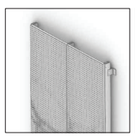
PANEL B



EXAMPLE

9 METAL PANEL SYSTEM

FLUSH, INTERLOCKING, METALLIC GRAY/SILVER AL. PANEL W/ CONCEALED FASTENER
PANEL A: PERFORATED (40% OPEN) METAL
PANEL B: SOLID METAL
INFILL: EXPANDED METAL

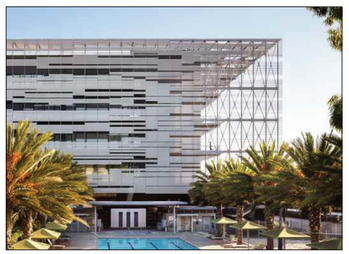


DETAIL

PANEL A

PANEL B

INFILL

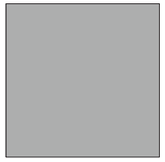


EXAMPLE

8 WALL SCONCE

20" x 8" BRUSHED ALUMINUM OUTDOOR WALL LIGHT
2700 K W/ WHITE MITERED GLASS

EXAMPLE



COLOR

7 RECESSED LIGHTING

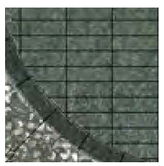
ADJUSTABLE LINEAR LED STRIP LIGHT WITH FORMED METAL COVE

EXAMPLE

COLOR

6 PASEO

ENHANCED AND CAST IN PLACE CONCRETE PAVING



ENHANCED

CAST IN PLACE

3 RETAIL STOREFRONT

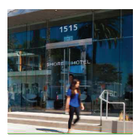
2" X 6" RECTANGULAR METAL TUBE FRAME WITH DUAL PANE ARCHITECTURAL GLASS
FINISH: FACTORY APPLIED
COLOR: METALLIC GRAY/ SILVER

EXAMPLE

COLOR

2 RETAIL ENTRY

2" X 6" RECTANGULAR METAL TUBE FRAME WITH DUAL PANE LOW-E ARCHITECTURAL GLASS
FINISH: FACTORY APPLIED
COLOR: METALLIC GRAY/ SILVER

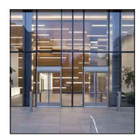


EXAMPLE

COLOR

1 LOBBY ENTRY

2" X 6" RECTANGULAR METAL TUBE FRAME WITH DUAL PANE LOW-E ARCHITECTURAL GLASS
FINISH: FACTORY APPLIED
COLOR: METALLIC GRAY/ SILVER



EXAMPLE

COLOR

South Park Towers

Los Angeles, CA

Venice Hope Group, LLC

Materials and Finishes

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May 29, 2025

LANDSCAPE CALCULATIONS

OPEN SPACE REQUIRED	24,233 SF
OPEN SPACE PROVIDED	25,768 SF
OPEN SPACE PROVIDED (COMMON)	20,718 SF
OPEN SPACE AS LANDSCAPE REQUIRED	5,180 SF (25%)
OPEN SPACE AS LANDSCAPE PROVIDED	5,180 SF (25%)
QUANTITY OF UNITS IN DEVELOPMENT	250
QUANTITY OF TREES REQUIRED (1 TREE/ 4 UNITS)	63
QUANTITY OF TREES PROVIDED	63
CANOPY TREE (36" BOX MIN.)	32
STREET TREE (36" BOX MIN.)	10
PALM TREE	5
HEDGE ROW (36" BOX MIN.)	16

PASEO SPACE PROVIDED	4,200 SF
PASEO SPACE AS LANDSCAPE PROVIDED	852 SF (20.2%)

NOTE:
SHRUBS AND/OR TREES SHALL BE CONTAINED WITHIN PERMANENT PLANTERS AT LEAST 30-INCHES IN DEPTH, AND LAWN OR GROUND COVER SHALL BE AT LEAST 12-INCHES IN DEPTH.

South Park Towers

Los Angeles, CA

Venice Hope Group, LLC

Composite Plan

L1

0 | 32 | 64 | 128

May 29, 2025

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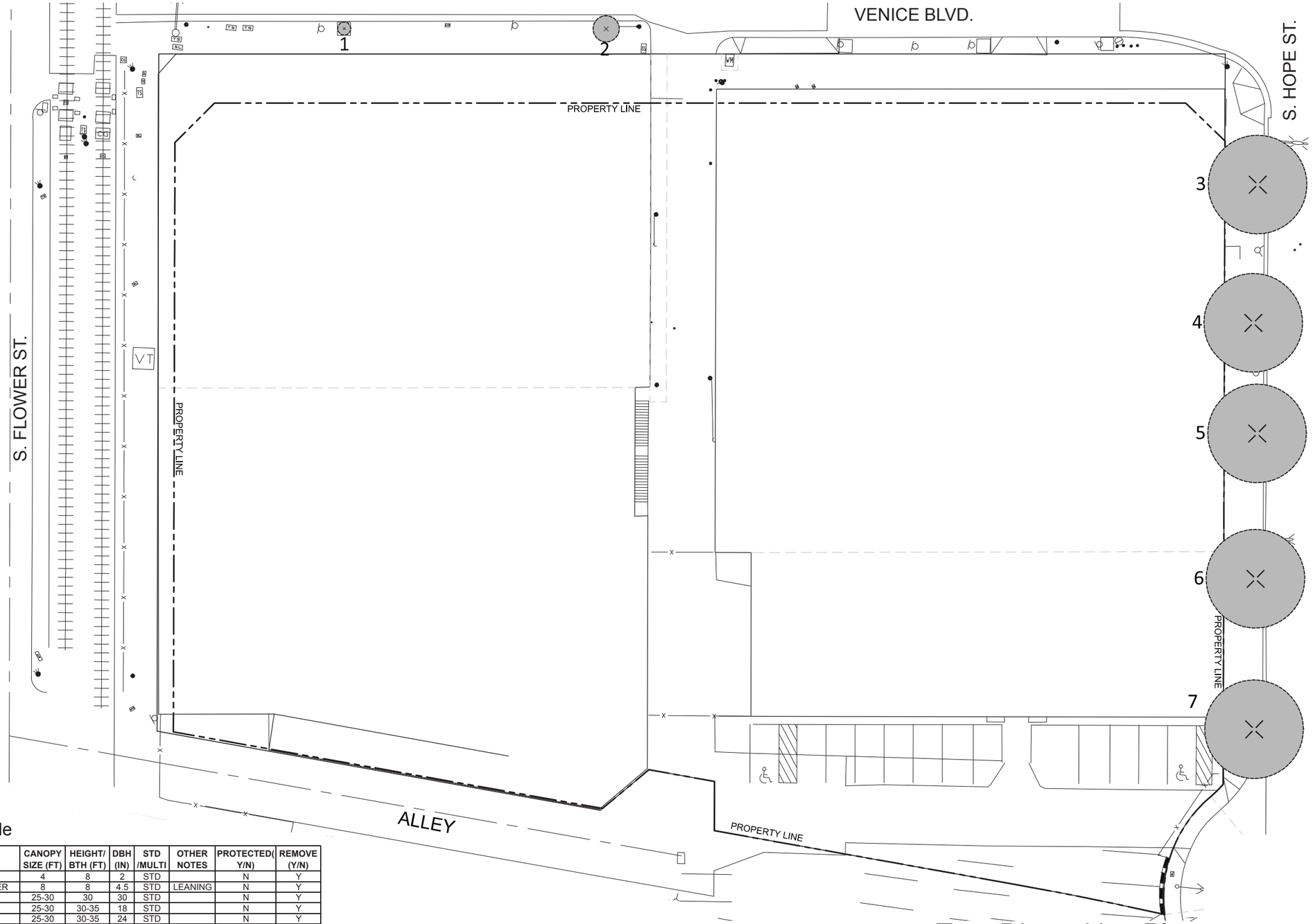

Summary

PROTECTED TREES - 0
TOTAL NO. OF ONSITE TREES - 0
TOTAL NO. OF OFFSITE TREES (STREET TREES) - 7
TOTAL TREES (BOTH ON SITE AND OFFSITE) - 7

Tree Legend

	NOTE	QTY
×	EXISTING STREET TREE TO BE REMOVED	7

Tree Inventory and Disposition Schedule

TREE#	SPECIES NAME	COMMON NAME	CANOPY SIZE (FT)	HEIGHT/ BTH (FT)	DBH (IN)	STD /MULTI	OTHER NOTES	PROTECTED(Y/N)	REMOVE (Y/N)
1	AFROCARPUS GRACILIOR	FERN PINE	4	8	2	STD		N	Y
2	JUNIPERUS CHINENSIS 'TORULOSA'	HOLLYWOOD JUNIPER	8	8	4.5	STD	LEANING	N	Y
3	FICUS MICROCARPA	INDIAN LAUREL	25-30	30	30	STD		N	Y
4	FICUS MICROCARPA	INDIAN LAUREL	25-30	30-35	18	STD		N	Y
5	FICUS MICROCARPA	INDIAN LAUREL	25-30	30-35	24	STD		N	Y
6	FICUS MICROCARPA	INDIAN LAUREL	25-30	30-35	24	STD		N	Y
7	FICUS MICROCARPA	INDIAN LAUREL	25-30	30-35	30	STD		N	Y

South Park Towers

Los Angeles, CA

Venice Hope Group, LLC

Tree Disposition Plan

L2

0 32 64 128

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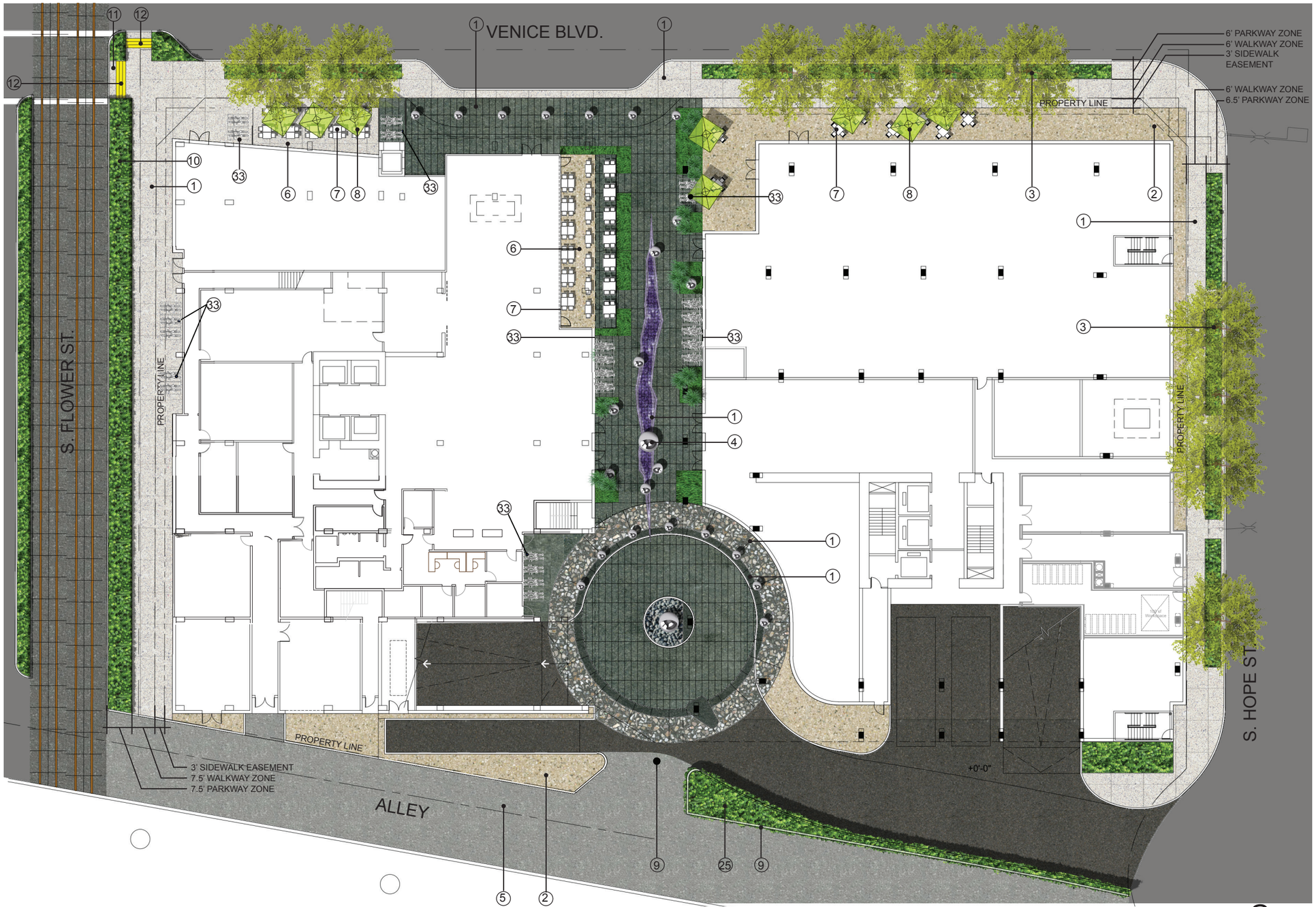

LEGEND

1. ENHANCED PAVING
2. CAST-IN-PLACE CONCRETE PAVING
3. PROPOSED STREET TREE PER URBAN FORESTRY - 36" BOX MIN.
4. STAINLESS STEEL SPHERE/BOLLARD
5. CONCRETE ALLEY
6. ENCLOSED RETAIL PATIO
7. TABLES AND CHAIRS
8. UMBRELLA
9. ACCESS FROM ALLEY
10. PLANTING BUFFER
11. PEDESTRIAN SWING GATE - PROPOSED AND SUBJECT TO BOE APPROVAL
12. TRUNCATED DOMES
13. RAISED PLANTER
14. CABANA
15. PORTABLE PLANTER
16. CHAISE LOUNGE CHAIRS
17. POOL
18. SPA
19. 5' HT NON-CLIMABLE POOL ENCLOSURE WITH SELF CLOSING SELF LATCHING GATES
20. BUILT IN BANQUETTE
21. DOUBLE SIDED FIREPLACE WITH LOUNGE SEATING
22. CANOPY TREE - 36" BOX MIN.
23. DATE PALM
24. BBQ COUNTER WITH SEATING AREA AND SHADE STRUCTURE
25. 5' HT HEDGE
26. HEDGE ROW - 36" BOX MIN.
27. PRIVATE PATIO
28. ARTIFICIAL TURF
29. GLASS SOUND BARRIER
30. FIRE PIT
31. ADA LIFT
32. GLASS SEPARATOR
33. BIKE RACK

South Park Towers

Los Angeles, CA

Venice Hope Group, LLC

Ground Level Plan

L3

0 | 32 | 64 | 128

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Podium Level Plan

L4

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South Park Towers

Los Angeles, CA

Venice Hope Group, LLC

9th & 10th Level Plan

L5

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South Park Towers

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Venice Hope Group, LLC

Roof Level Plan

L6

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South Park Towers

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Venice Hope Group, LLC

Podium Level Enlargement - Residential

L7

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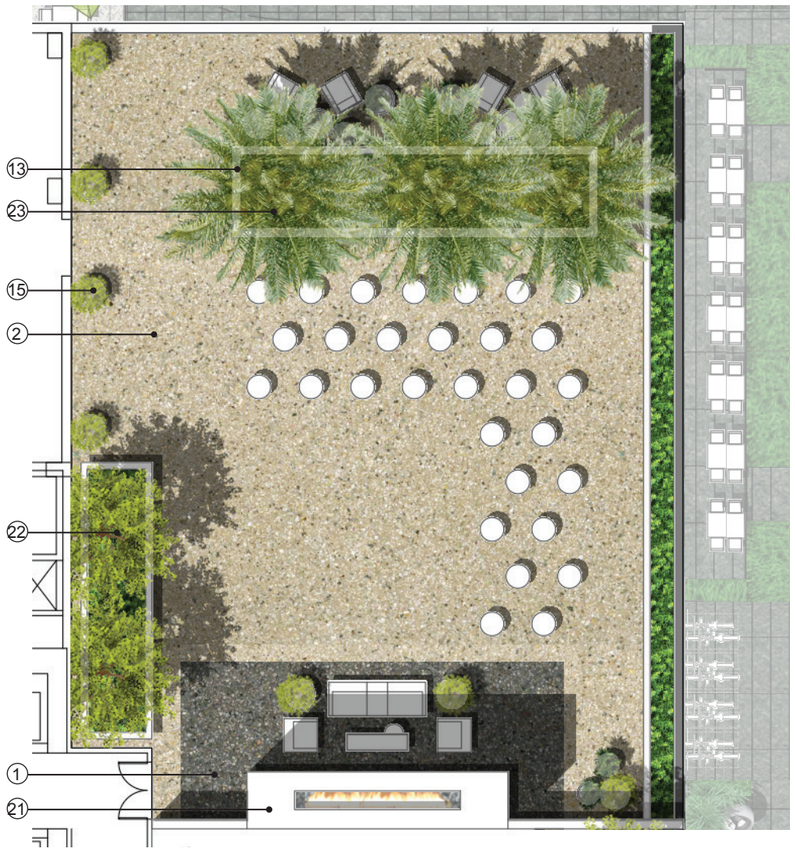

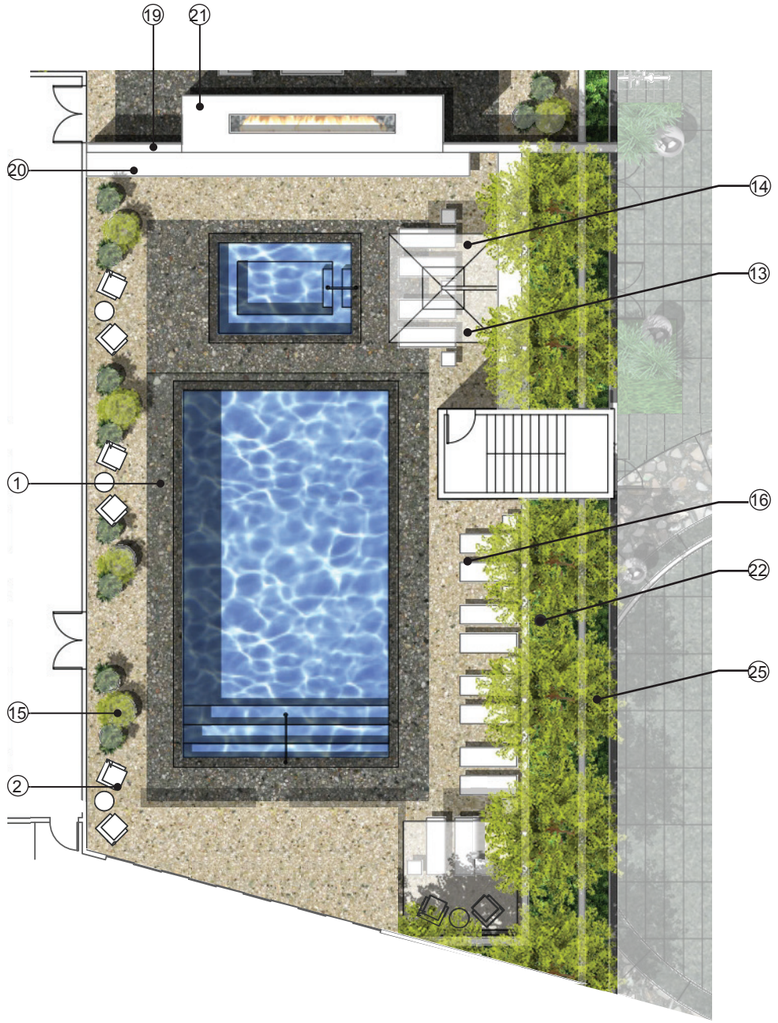

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South Park Towers

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Podium Level Enlargement - Hotel

L8

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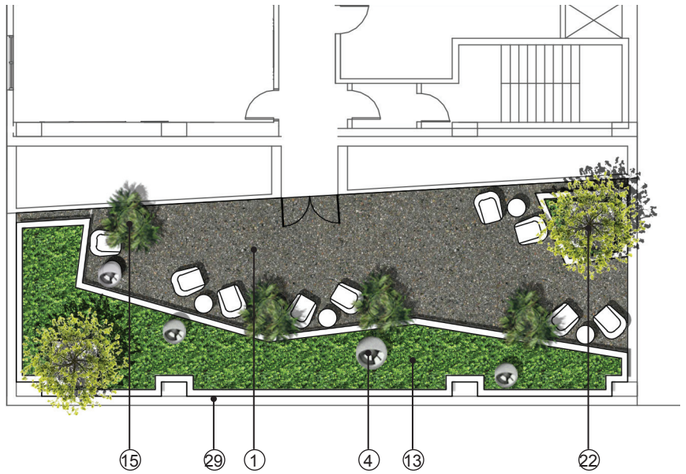

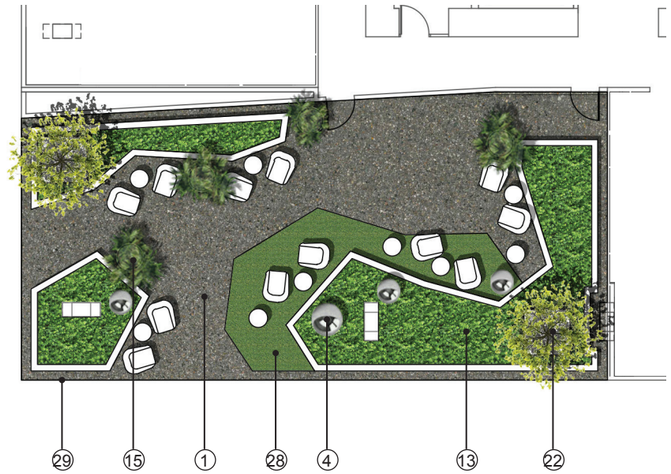

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9th & 10th Level Enlargement

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L9

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May 29, 2025

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Venice Hope Group, LLC

Roof Level Enlargement

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L10

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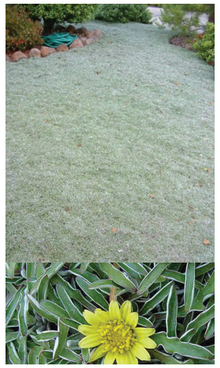
May 29, 2025

GROUNDCOVER

ACORUS GRAMINEUS ‘OGON’
golden variegated sweet flag
1 GAL @ 12” O.C.



DYMONDIA MARGARETAE
silver carpet
SODDED FROM FLATS

FESTUCA GLAUCA ‘ELIJAH BLUE’
blue fescue
1 GAL @ 12” O.C.

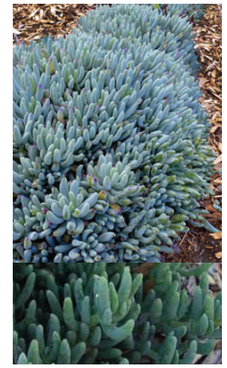
FESTUCA RUBRA
red fescue
FROM SOD

LAWN
FROM SOD

MYOPORUM PARVIFOLIUM
‘PUTAH CREEK’
creeping myoporum
4” POTS @ 8” O.C.

SEDUM ALBUM
white stonecrop
4” POTS @ 8” O.C.

SENECIO MANDRALISCAE
blue chalk sticks
1 GAL @ 12” O.C.



SENECIO SERPENS
blue chalk sticks
1 GAL @ 12” O.C.

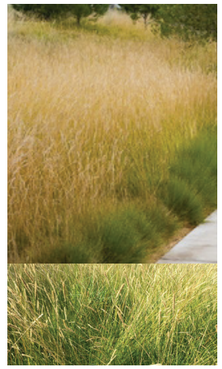
SENECIO VITALIS
narrow leaf chalk sticks
1 GAL @ 12” O.C.

GRASSES

LEYMUS CONDENSATUS
‘CANYON PRINCE’
canyon prince wild rye
1 GAL @ 12” O.C.

NASSELLA TENUISSIMA
mexican feather grass
1 GAL @ 12” O.C.

PENNISETUM ‘FAIRY TAILS’
everygreen fountain grass
1 GAL @ 12” O.C.



PENNISETUM SPATHIOLATUM
slender veldt grass
1 GAL @ 12” O.C.

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Plant Palette

L11

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May 29, 2025

SHRUBS

AGAVE AMERICANA
century plant
15 GAL @ 30”X30”

AGAVE ATTENUATTA
fox tail agave -MIX TO CREATE NATURAL CLUMP
5 GAL @ 18” O.C.
15 GAL @ 24” O.C.

AGAVE ‘BLUE FLAME’
blue flame agave
5 GAL @ 18” O.C.

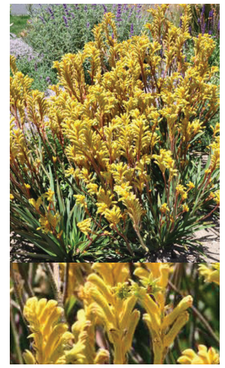
AGAVE ‘BLUE GLOW’
blue glow agave
5 GAL @ 18” O.C.

AGAVE DESMETTIANA
smooth agave
15 GAL @ 30”X30”

AGAVE VILMORINIANA
octopus agave
15 GAL @ 30”X30”

ALOE ARBORESCENS
tree aloe
5 GAL @ 24” O.C.

ANIGOZANTHOS ‘BIG RED’
red kangaroo paw
5 GAL @ 18” O.C.



ANIGOZANTHOS ‘BUSH GOLD’
yellow kangaroo paw
5 GAL @ 18” O.C.

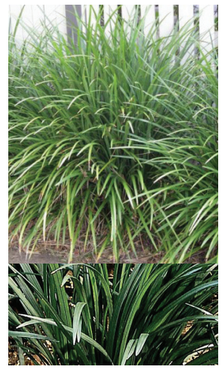
ANIGOZANTHOS ‘BUSH TANGO’
orange kangaroo paw
5 GAL @ 18” O.C.

CHONDROPETALUM TECTORUM
small cape rush
5 GAL @ 18” O.C.

DIANELLA CAERULEA ‘CASSA BLUE’
blue flax lily
5 GAL @ 18” O.C.

DIANELLA TASMANICA ‘VARIEGATA’
white striped tasman flax lily
5 GAL @ 18” O.C.

FURCRAEA FOETIDA ‘MEDIOPICTA’
variegated mauritius hemp
15 GAL @ 30”X30”



LIRIOPE ‘GIGANTEA’
giant lily turf
5 GAL @ 18” O.C.

LOROPETALUM CHINENSE ‘RAZZLEBERRY’
razzleberri fringe flower
5 GAL @ 24” O.C.

PITTOSPORUM CRASSIFOLIUM
karo
5 GAL @ 24” O.C.

PHORMIUM ‘AMAZING RED’
amazing red new zealand flax
5 GAL @ 18” O.C.

PHORMIUM ‘BRONZE BABY’
bronze baby new zealand flax
5 GAL @ 24” O.C.

PHORMIUM ‘YELLOW WAVE’
yellow wave new zealand flax
5 GAL @ 18” O.C.

ROSMARINUS OFFICINALIS ‘PROSTRATUS’
trailing rosemary
5 GAL @ 18” O.C.

WESTRINGIA FRUTICOSA ‘MORNING LIGHT’
coast rosemary
5 GAL @ 24” O.C.

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Plant Palette

L12

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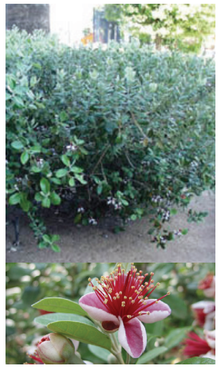
HEDGES

PITTOSPORUM CRASSIFOLIUM
karo
15 GAL @ 24” O.C.



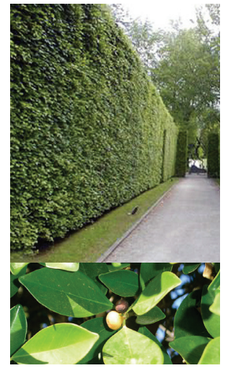
FEIJOA SELLOWIANA
pineapple guava
15 GAL @ 24” O.C.

BUXUS JAPONICA
japanese boxwood
15 GAL @ 24” O.C.

LIGUSTRUM TEXANUM
waxleaf privet
15 GAL @ 24” O.C.

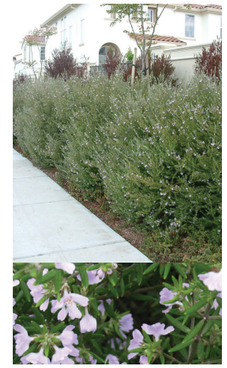
PODOCARPUS GRACILIOR
fern podocarpus
15 GAL @ 24” O.C.

PODOCARPUS MACROPHYLLUS
yew podocarpus
15 GAL @ 24” O.C.



FICUS MICROCARPA NITIDA
‘GREEN GEM’
green gem fig
15 GAL @ 24” O.C.

PITTOSPORUM TENUIFOLIUM
‘SILVER SHEEN’
silver sheen kohuhu
15 GAL @ 24” O.C.



WESTRINGIA ‘WYNYABBIE GEM’
coast rosemary
15 GAL @ 24” O.C.

HEDGE ROW

PODOCARPUS GRACILIOR
fern podocarpus
36” BOX MIN.

CANOPY TREES

ACACIA BAILEYANA
golden mimosa tree
36” BOX MIN.

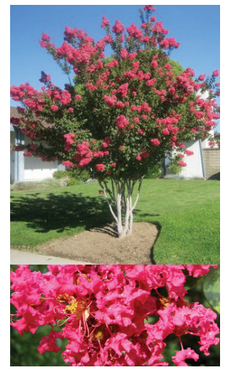
ARBUTUS ‘MARINA’
marina strawberry tree
36” BOX MIN.

CERCIDIUM ‘DESERT MUSEUM’
desert museum palo verde
36” BOX MIN.

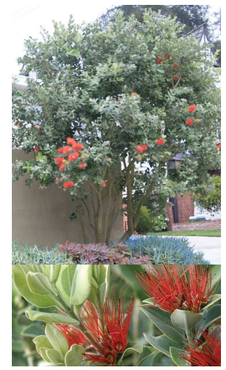
JACARANDA MIMOSIFOLIA
jacaranda tree
36” BOX MIN.

KOELREUTERIA BIPINNATA
chinese flame tree
36” BOX MIN.

KOELREUTERIA PANICULATA
goldenrain tree
36” BOX MIN.



LAGERSTROEMIA INDICA
crape myrtle
36” BOX MIN.



METROSIDEROS EXCELSUS
new zealand christmas tree
36” BOX MIN.

OLEA EUROPAEA
olive
36” BOX MIN.

PLATANUS X ACERIFOLIA
london plane
36” BOX MIN.

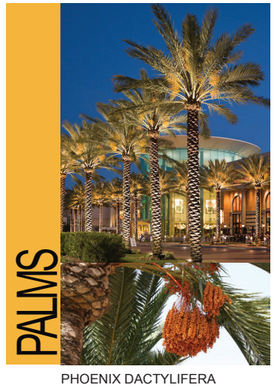
PLATANUS RACEMOSA
california sycamore
36” BOX MIN.

PRUNUS CERASIFERA
‘KRAUTER VESUVIUS’
krauter vesuvius purple leaf plum
36” BOX MIN.

TIPUANA TIPU
tipu tree
36” BOX MIN.

ULMUS PARVIFOLIA
chinese elm
36” BOX MIN.

PALMS



PHOENIX DACTYLIFERA
date palm
18’ BTH

STREET TREES

PODOCARPUS GRACILIOR
fern podocarpus
36” BOX MIN. BASED ON
APPROVAL PER URBAN FORESTRY

South Park Towers

Los Angeles, CA

Venice Hope Group, LLC

Plant Palette

L13

May 29, 2025

444 S Flower Street - Suite 1220
Los Angeles, California 90071
213.614.6050
213.614.6051 fax
www.tsminc.com

EXHIBIT B

RENDERINGS

CPC-2018-3336-SN-TDR-CUB-SPR-MSC

July 10, 2025

South Park Towers

Los Angeles, CA

Conceptual Rendering: Venice Blvd Eye-Level Looking South

Venice Hope Group, LLC

May 29, 2025

444 S Flower Street - Suite 1220
Los Angeles, California 90071
213.614.6050
213.614.6051 fax
www.tsminc.com

South Park Towers

Los Angeles, CA

Conceptual Rendering : I-10 Freeway Car-Level Looking North

Venice Hope Group, LLC

May 29, 2025

444 S Flower Street - Suite 1220
Los Angeles, California 90071
213.614.6050
213.614.6051 fax
www.tsminc.com

South Park Towers

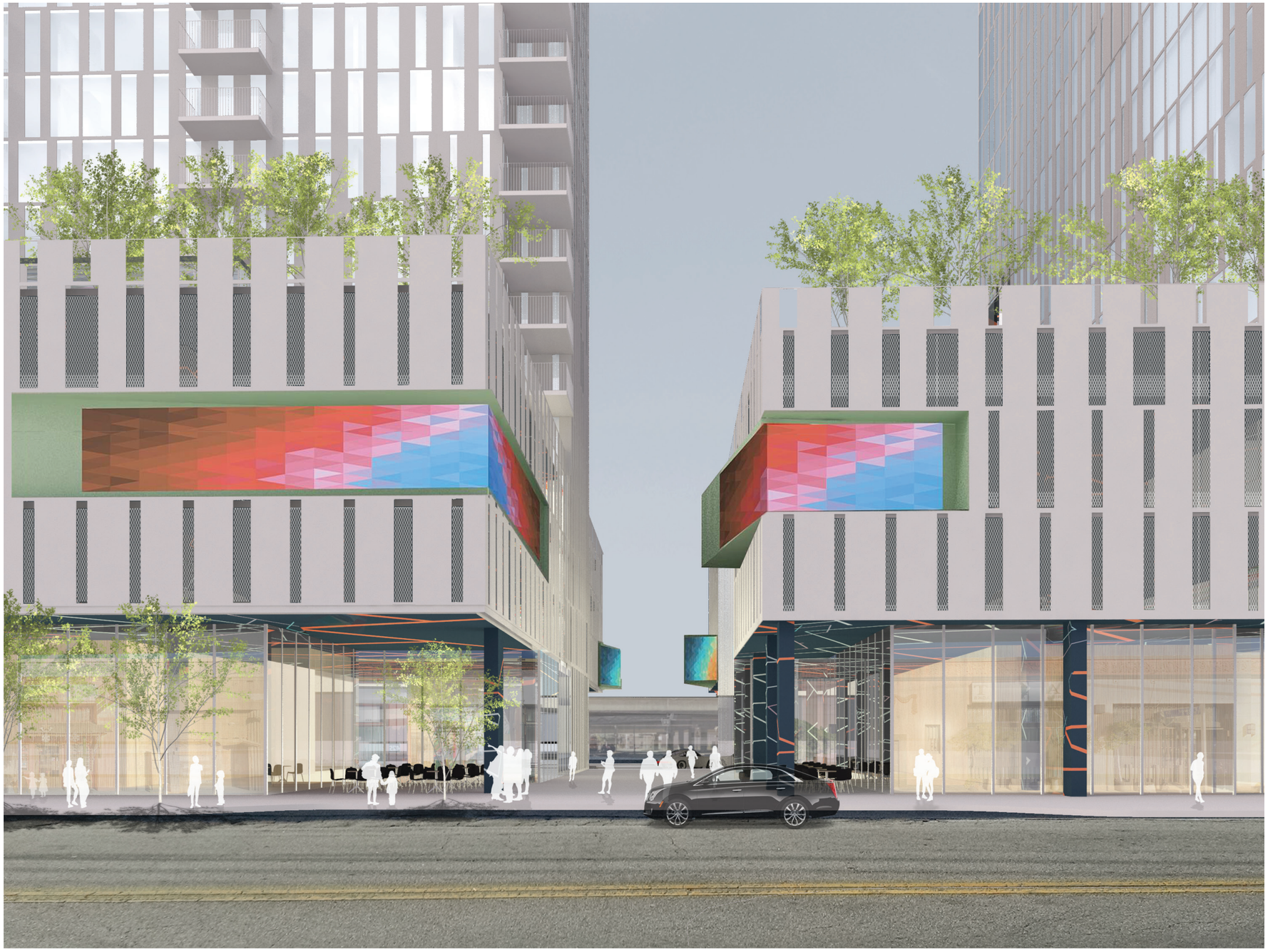
Los Angeles, CA

Venice Hope Group, LLC

Rooftop Aerial

444 S Flower Street - Suite 1220
Los Angeles, California 90071
213.614.6050
213.614.6051 fax
www.tsminc.com

May 29, 2025



South Park Towers

Los Angeles, CA

Eye-Level Paseo Looking South

Venice Hope Group, LLC

May 29, 2025

444 S Flower Street - Suite 1220
Los Angeles, California 90071
213.614.6050
213.614.6051 fax
www.tsminc.com

South Park Towers

Los Angeles, CA

Conceptual Rendering: I-10 Freeway Car-Level Looking East

Venice Hope Group, LLC

May 29, 2025

444 S Flower Street - Suite 1220
Los Angeles, California 90071
213.614.6050
213.614.6051 fax
www.tsminc.com

South Park Towers

Los Angeles, CA

Conceptual Rendering: I-10 Freeway Car-Level Looking West

Venice Hope Group, LLC

May 29, 2025

444 S Flower Street - Suite 1220
Los Angeles, California 90071

213.614.6050
213.614.6051 fax
www.tsminc.com

EXHIBIT C

MITIGATION MONITORING PROGRAM

CPC-2018-3336-SN-TDR-CUB-SPR-MSC

July 10, 2025

South Park Towers Project
Mitigation Monitoring Program

Case Number: ENV-2018-3337-SCEA

1.1 INTRODUCTION

This Mitigation Monitoring Program (MMP) has been prepared pursuant to Public Resources Code Section 21081.6, which requires a Lead Agency to adopt a "reporting or monitoring program for changes to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment." In addition, Section 15097(a) of the State CEQA Guidelines requires that a public agency adopt a program for monitoring or reporting mitigation measures and project revisions, which it has required to mitigate or avoid significant environmental effects. This MMP has been prepared in compliance with the requirements of CEQA, Public Resources Code Section 21081.6 and Section 15097 of the State CEQA Guidelines.

The City of Los Angeles is the Lead Agency for the proposed South Park Towers Project (Project) and therefore is responsible for administering and implementing the MMP. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity that accepts the delegation; however, until mitigation measures have been completed, the Lead Agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program.

A Sustainable Communities Environmental Assessment (SCEA) has been prepared to address the potential environmental impacts of the Project. The evaluation of the Project's impacts in the SCEA takes into consideration the project design features (PDF) and applies mitigation measures (MM) as necessary to avoid or reduce potentially significant environmental impacts. This MMP is designed to monitor implementation of the PDFs and MMs identified for the Project.

1.2 ORGANIZATION

As shown on the following pages, each identified project design feature and mitigation measure for the Project is listed and categorized by environmental impact area, with accompanying identification of the following:

- Enforcement Agency: the agency with the power to enforce the PDF or MM.
- Monitoring Agency: the agency to which reports involving feasibility, compliance, implementation, and development are made.
- Monitoring Phase: the phase of the Project during which the PDF or MM shall be monitored.
- Monitoring Frequency: the frequency at which the PDF or MM shall be monitored.
- Action Indicating Compliance: the action by which the Enforcement or Monitoring Agency indicates that compliance with the identified PDF or required MM has been implemented.

1.3 ADMINISTRATIVE PROCEDURES AND ENFORCEMENT

This MMP shall be enforced throughout all phases of the Project. The Applicant shall be responsible for implementing each PDF and MM and shall be obligated to provide certification, as identified below, to the appropriate monitoring and enforcement agencies that each PDF and MM has been implemented. The Applicant shall maintain records demonstrating compliance with each PDF and MM. Such records shall be made available to the City upon request.

During the construction phase and prior to the issuance of building permits, the Applicant shall retain an independent Construction Monitor (either via the City or through a third-party consultant), approved by the Department of City Planning, who shall be responsible for monitoring implementation of PDFs and MMs during construction activities consistent with the monitoring phase and frequency set forth in this MMP.

The Construction Monitor shall also prepare documentation of the Applicant's compliance with the PDFs and MMs during construction every 90 days in a form satisfactory to the Department of City Planning. The documentation must be signed by the Applicant and Construction Monitor and be included as part of the Applicant's Compliance Report. The Construction Monitor shall be obligated to report to the Enforcement Agency of any non-compliance with the PDFs and MMs within two businesses days if the Applicant does not correct the non-compliance within a reasonable time of notification to the Applicant by the monitor or if the non-compliance is repeated. Such non-compliance shall be appropriately addressed by the Enforcement Agency.

1.4 PROGRAM MODIFICATION

After review and approval of the final MMP by the Lead Agency, minor changes and modifications to the MMP are permitted, but can only be made subject to City approval. The Lead Agency, in conjunction with any appropriate agencies or departments, will determine the adequacy of any proposed change or modification. This flexibility is necessary in light of the nature of the MMP and the need to protect the environment. No changes will be permitted unless the MMP continues to satisfy the requirements of CEQA, as determined by the Lead Agency.

The Project shall be in substantial conformance with the PDFs, RCMs, and MMs contained in this MMP. The enforcing departments or agencies may determine substantial conformance with PDFs and MMs in the MMP in their reasonable discretion. If the department or agency cannot find substantial conformance, a PDF or MM may be modified or deleted as follows: the enforcing department or agency, or the decision maker for a subsequent discretionary project related approval finds that the modification or deletion complies with CEQA, including CEQA Guidelines Sections 15162 and 15164, which could include the preparation of an addendum or subsequent environmental clearance, if necessary, to analyze the impacts from the modifications to or deletion of the PDFs or MMs. Any addendum or subsequent CEQA clearance shall explain why the PDF or MM is no longer needed, not feasible, or the other basis for modifying or deleting the PDF or MM, and that the modification will not result in a new significant impact consistent with the requirements of CEQA. Under this process, the modification or deletion of a PDF or MM shall not, in and of itself, require a modification to any Project discretionary approval unless the Director of Planning also finds that the change to the PDF or MM results in a substantial change to the Project or the non-environmental conditions of approval.

1.5 MITIGATION MONITORING PROGRAM

A. Hazards and Hazardous Materials

Mitigation Measures

MM-HAZ-1 Soil Management Plan

- A Soils Management Plan (SMP) shall be prepared and implemented to provide a framework under which work can proceed safely and contaminated soils can be properly handled, segregated, stockpiled and disposed of at a licensed disposal facility. Proper handling of the contaminated media would be required regardless of the contamination source.
- The Applicant shall provide confirmation that the VOC concentrations in soil vapor meet the residential scenario Department of Toxic Substances Control-modified Screening Levels (DTSC-SLs) established in DTSC's Human Health Risk Assessment (HHRA).
- In the event that hazardous soils or materials are discovered, the applicant shall obtain approval from the Fire Department and the Department of Public Works, for the transport, creation, use, containment, treatment, and disposal of the hazardous material(s) prior to the issuance of a use of land or building permit, or issuance of a change of occupancy.
- The SMP shall also contain procedures to be followed in the event that any undocumented subsurface features of potential environmental concern are encountered during the excavation grading, and/or other earthmoving activities. These procedures shall include safety training, testing protocols, decontamination and decommission.
- The SMP shall also include procedures for handling and transportation of soils with respect to nearby sensitive receptors, such as nearby residential uses. Impacted soil removed from the Project Site shall comply with the following:
    - A qualified environmental consultant shall be present on the Project Site at the start of soil disturbance activities in the known or suspected locations of contaminated soils and shall be on call at other times as necessary, to monitor compliance with the SMP and to actively monitor the soils and excavations of evidence of contamination (primarily VOCs, which includes PCE and TCE.
    - Soil Monitoring during soil disturbance include visual observation (soil staining), representative sampling via a photo ionization detector, and/or VOC monitoring.
    - Timely testing and sampling of soils is required so that VOC-contaminated soils can be separated from inert soils for proper disposal.
    - Impacted soil shall be transported to an approved treatment/disposal facility.
    - When loading into trucks is completed, and during transportation, no excavated material shall extend above the sides or rear of the truck or trailer.
    - Prior to covering/tarping, loaded impacted soil shall be wetted by spraying with dust inhibitors.
    - The trucks or trailers shall be completely covered/tarped prior to leaving the Project Site to prevent particulate emissions to the atmosphere.
    - The exterior of the trucks (including the tires) shall be cleaned off prior to the trucks leaving the excavation location.
    - Weekly inspections of all waste shall be performed by a qualified environmental consultant to document that waste is being managed in accordance with the SMP.

- **Enforcement Agency:** South Coast Air Quality Management District, Department of Building and Safety
- **Monitoring Agency:** Department of Building and Safety
- **Monitoring Phase:** Pre-Construction, Construction
- **Monitoring Frequency:** Once during plan check; Ongoing during field inspection
- **Action Indicating Compliance:** Building and Safety permit signoff

B. Noise

Mitigation Measures

Increased Noise Levels (Demolition, Grading, and Construction Activities)

MM-N-1 To the maximum extent possible, demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.

- **Enforcement Agency:** Department of Building and Safety, Department of City Planning
- **Monitoring Agency:** Department of Building and Safety, Department of City Planning
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once during plan check; Periodic field inspections
- **Action Indicating Compliance:** Field inspection sign-off

MM-N-2 The project contractor shall use power construction equipment with noise shielding and muffling devices.

- **Enforcement Agency:** Department of Building and Safety, Department of City Planning
- **Monitoring Agency:** Department of Building and Safety, Department of City Planning
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once during plan check; Periodic field inspections
- **Action Indicating Compliance:** Field inspection sign-off

MM-N-3 The project contractor shall erect temporary noise-attenuating sound barriers along the northern and eastern perimeters of the Project Site fronting Venice Street and Hope Street. The sound barrier along the Venice Street frontage shall be designed to provide a minimum sound attenuation of -12.5 dBA. The sound barrier along Hope Street shall be designed to provide a minimum sound attenuation of -10 dBA. The sound wall shall be a minimum of 8 feet in height to block the line-of-site of construction equipment and off-site receptors at the ground level. The sound barrier shall include ¾ inch plywood or other sound absorbing material.

- **Enforcement Agency:** Department of Building and Safety, Department of City Planning
- **Monitoring Agency:** Department of Building and Safety, Department of City Planning
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once during plan check; Periodic field inspections
- **Action Indicating Compliance:** Field inspection sign-off

MM-N-4 During structural framing, the project contractor shall utilize temporary portable acoustic barriers, partitions, or acoustic blankets to effectively block the line-of-sight between noise producing equipment and the adjacent residential land uses for purposes of ensuring noise levels at the adjacent sensitive receptors does not exceed 5 dBA over the ambient noise levels.

- **Enforcement Agency:** Department of Building and Safety, Department of City Planning
- **Monitoring Agency:** Department of Building and Safety, Department of City Planning
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once during plan check; Periodic field inspections
- **Action Indicating Compliance:** Field inspection sign-off

MM-N-5 An information sign shall be posted at the entrance to each construction site that identifies the permitted construction hours and provides a telephone number to call and receive information about the construction project or to report complaints regarding excessive noise levels. Any reasonable complaints shall be rectified within 24 hours of their receipt.

- **Enforcement Agency:** Department of Building and Safety, Department of City Planning
- **Monitoring Agency:** Department of Building and Safety, Department of City Planning
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once during plan check; Periodic field inspections
- **Action Indicating Compliance:** Field inspection sign-off

MM-N-6 The Applicant and contractors shall maintain ongoing contact with administrator of Metro Charter Elementary School. The administrative offices shall be contacted when demolition, grading and construction activity begin on the Project Site so that students and their parents will know when such activities are to occur. There shall be no staging or parking of construction vehicles, including vehicles to transport workers on Hope Street, north of Venice Boulevard adjacent to the school. Due to noise impacts on the schools, no construction vehicles or haul trucks shall be staged or idled on Hope Street, north of the Venice Boulevard, adjacent to the school, during school hours.

- **Enforcement Agency:** Department of Building and Safety, Department of City Planning
- **Monitoring Agency:** Department of Building and Safety, Department of City Planning
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once during plan check; Periodic field inspections
- **Action Indicating Compliance:** Field inspection sign-off

PPM-NOISE-2 Groundborne Vibration. The Project would incorporate the following measures from the SCAG PEIR Mitigation Measure PPM-NOISE-2:

(d) Restrict construction activities to permitted hours in accordance with local jurisdiction regulation.

(e) Properly maintain construction equipment and outfit construction equipment with the best available noise suppression devices (e.g., mufflers, silences, wraps).

(f) Prohibit idling of construction equipment for extended periods of time in the vicinity of sensitive receptors.

- **Enforcement Agency:** Department of Building and Safety, Department of City Planning
- **Monitoring Agency:** Department of Building and Safety, Department of City Planning
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once during plan check; Periodic field inspections
- **Action Indicating Compliance:** Field inspection sign-off

C. Public Services

Project Design Features

PDF-PS-1 **Public Services (Police – Demolition / Construction Sites).** Fences shall be constructed around the site to minimize trespassing, vandalism, short-cut attractions and attractive nuisances.

- **Enforcement Agency:** Los Angeles Police Department
- **Monitoring Agency:** Los Angeles Police Department, Department of City Planning
- **Monitoring Phase:** Pre-Construction
- **Monitoring Frequency:** Once, prior to issuance of building permit
- **Action Indicating Compliance:** Sign-off on LAPD reviewed diagrams; issuance of building permit

PDF-PS-2 **Public Services (Police – Operation).** The plans shall incorporate the design guidelines relative to security, semi-public and private spaces, which may include but not be limited to: surveillance cameras, access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the project site if needed.

- **Enforcement Agency:** Los Angeles Police Department, Department of City Planning
- **Monitoring Agency:** Los Angeles Police Department, Department of City Planning
- **Monitoring Phase:** Pre-Construction
- **Monitoring Frequency:** Once during plan check; Once prior to issuance of building permit
- **Action Indicating Compliance:** LAPD approval of plans; issuance of building permit

D. Transportation

Mitigation Measures

MM-T-1: Transportation Demand Management (TDM) Promotions and Marketing

The Project shall provide all eligible employees and residents with marketing and promotional materials to educate and inform travelers about site-specific transportation options and effects of their travel choices.

- **Enforcement Agency:** Department of Transportation, Department of City Planning

- **Monitoring Agency:** Department of Transportation, Department of City Planning
- **Monitoring Phase:** Certificate of Occupancy
- **Monitoring Frequency:** Once during plan check; on-going during operation.
- **Action Indicating Compliance:** Certificate of Occupancy.

MM-T-2 Shared Mobility

The project shall provide on-demand access to shared mobility options as an incentive to consider other transportation travel modes. The Project shall provide five car-share spaces, ten bike-share spaces, and a rideshare program.

- **Enforcement Agency:** Department of Transportation, Department of City Planning
- **Monitoring Agency:** Department of Transportation, Department of City Planning
- **Monitoring Phase:** Site Plan Review
- **Monitoring Frequency:** Once during plan check; on-going during operation.
- **Action Indicating Compliance:** Issuance of building permit; Certificate of Occupancy.

MM-T-3 Unbundle Parking

The Project shall provide unbundled parking which separates the leasing of parking from leasing of apartments so that residents must specifically opt in to paying to park a car. The analysis estimated that a parking space would cost at least $220 per month for residents to lease. The Applicant shall unbundle parking costs from residential lease payments and charge at least $220 per month per parking space for residents who park on site.

- **Enforcement Agency:** Department of Transportation, Department of City Planning
- **Monitoring Agency:** Department of Transportation, Department of City Planning
- **Monitoring Phase:** Certificate of Occupancy
- **Monitoring Frequency:** On-going during operation.
- **Action Indicating Compliance:** Issuance of building permit; Certificate of Occupancy.

E. Utilities and Service Systems

Project Design Features

PDF-PU-1 As part of its application for a water supply assessment from the LADWP, the Applicant would include the following water conservation measures that are in addition to those required by codes and ordinances for the entire Project:

- Fixtures
  - ENERGY STAR Certified Residential Dishwashers – standard with 3.0 gallons per cycle in lieu of 3.5 gallons per cycle
  - High Efficiency Toilets with flush volume of 1.1 gallons of water per flush (gpf) in lieu of 1.28 gpf
  - Showerheads with flow rate of 1.5 gallons per minute (gpm) in lieu of 1.8 gpm
- Landscape and Irrigation
  - Drip/Subsurface Irrigation (Micro-Irrigation)

    - Proper Hydro-zoning/zoned Irrigation (groups plants with similar water requirements together)
  - Pool
    - Domestic Pool/Spa recirculating filtration equipment
    - Water-Saving Pool Filter

- **Enforcement Agency:** Department of City Planning; Los Angeles Department of Water and Power
- **Monitoring Agency:** Department of City Planning
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once prior to issuance of building permit
- **Action Indicating Compliance:** Issuance of building permit; Field inspection sign-off

EXHIBIT D

PROPOSED SIGN DISTRICT ORDINANCE

CPC-2018-3336-SN-TDR-CUB-SPR-MSC

July 10, 2025

DRAFT SOUTH PARK TOWERS SIGN DISTRICT

(JUNE 2025)

DRAFT

ORDINANCE NO. _____

An ordinance establishing the South Park Towers Sign District (Sign District) pursuant to the provisions of Section 13.11 of the Los Angeles Municipal Code (Code).

WHEREAS, the General Plan Framework identifies the South Park Towers Project (Project) site as within the Downtown Center, which is intended as the primary economic, governmental, and social focal point of Los Angeles, with an enhanced residential community, and encourages the expansion of expansion of business, tourism, and housing that distinguishes and uniquely identifies the Downtown Center;

WHEREAS, the Project Site is designated for Transit Core land uses and is located within the Downtown Community Plan area, which envisions dense centers of activity that connect users to a variety of attractions, and encourages a mix of uses which create an active, 24-hour downtown environment for current residents and which would also foster increased tourism;

WHEREAS, the Project will be a mixed-use infill development incorporating commercial, hospitality, and residential uses with amenities for downtown residents and visitors to the City, supporting the City's goals of adding new hotel rooms in proximity to the Convention Center;

WHEREAS, the Project Site will require a unique and comprehensive program for on-and off-site signage that contributes to and enhances the identity of the Sign District area;

WHEREAS, a clear and consistent set of regulations established by this Sign District would provide a level of certainty for future signage for the site while remaining mindful of nearby sensitive residential uses and driver safety, providing signage compatible with the surrounding community character by limiting Digital Displays and Supergraphic Signs to Venice Boulevard and to the interior of the Project Site; and

WHEREAS, the Sign District will foster a vibrant urban environment with a unified aesthetic and sense of identity, by setting standards for uniform signage design, providing well-planned placement, design and architectural integration of signage with consideration for surrounding uses and architectural design, and improving pedestrian and traffic safety by directing functional wayfinding and building identification throughout the Project Site.

NOW, THEREFORE,
THE PEOPLE OF THE CITY OF LOS ANGELES
DO ORDAIN AS FOLLOWS:

SECTION 1. ESTABLISHMENT OF THE SOUTH PARK TOWERS SIGN DISTRICT.

The City Council hereby establishes the South Park Towers Sign District (Sign District), which shall be that area of the City shown within the heavy solid line on **Map 1 - Sign District Boundary**, comprising approximately 1.7-acres of land, bounded by Venice Boulevard to the north, Flower Street to the west, an unnamed alley and the Interstate 10 Caltrans Right-of-Way to the south, and Hope Street to the east.

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Map 1 - Sign District Boundary

SECTION 2. PURPOSE.

The Sign District is intended to:

A. Support and enhance the land uses and urban design objectives of the Downtown Community Plan;

B. Create a unique and recognizable identity through signage elements to enhance and contribute to the development of the South Park District of Downtown Los Angeles, draw visitors to the Convention Center and Los Angeles Sports and Entertainment District to benefit the local economy, and reduce lingering blight;

C. Permit a variety of signage elements to allow for creativity and flexibility in design over time;

D. Ensure that new signs are responsive to and integrated with the aesthetic character of the structures on which they are located;

E. Protect adjacent residential communities from potential adverse impacts by concentrating signage away from residential areas, setting standards for signage amounts, size, illumination and sign motion/animation, and to establish a program requiring the removal of blight; and

F. Coordinate the location and display of signs so as to enhance the pedestrian realm, minimize potential traffic hazards, protect public safety, and maintain compatibility with surrounding uses.

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SECTION 3. APPLICATION OF SUPPLEMENTAL USE DISTRICT REGULATIONS.

A. The regulations of this Ordinance are in addition to those set forth in the Planning and Zoning provisions of the Code. These regulations do not convey any rights not otherwise granted under the provisions and procedures contained in the Code or other relevant ordinances, except as specifically provided for in this Ordinance.

B. Wherever this Ordinance contains provisions that establish regulations that are different from, more restrictive than, or more permissive than those contained in the Code, this Ordinance shall prevail.

C. All signs authorized by this Ordinance must comply with applicable State and federal laws, including California's Outdoor Advertising Act (OAA) (Business and Professions Code Sections 5200-5486) and applicable safety provisions in the California Vehicle Code, including Vehicle Code Sections 21465, 21466, and 21466.5. Nothing in this Ordinance can or is intended to alter or avoid applicable State and federal requirements.

SECTION 4. DEFINITIONS.

Whenever the following terms are used in this Ordinance, they shall be construed as defined in this Section. Words and phrases not defined here shall be construed as defined in Section 4C.11 (Signs) or Section 14.3 (Glossary) of the Code.

Digital Display. A sign face, building face, or any building or structural component that displays still images, scrolling images, moving images, or flashing images, including video and animation, through the use of grid lights, cathode ray projections, light emitting diode displays, plasma screens, liquid crystal displays, fiber optics, or other electronic media or technology that is either independent of or attached to, integrated into, or projected onto a building or structural component, or that may be changed remotely through electronic means and that is located within the Sign District.

Off-Site Sign. A sign located within the Sign District that displays any message directing attention to a business, product, service, profession, commodity, activity, event, person, institution, or any other commercial message, which is generally conducted, sold, manufactured, produced, or offered or occurs elsewhere than within the boundaries of the Sign District.

On-Site Sign. A sign located within the Sign District that is other than an Off-Site Sign.

Supergraphic Sign. A sign, located within the Sign District, consisting of an image projected onto a wall or printed on vinyl, mesh or other material with or without written text, supported and attached to a wall by an adhesive and/or by using stranded cable and eye-bolts and/or other materials or methods, and that does not comply with the following provisions of the Code: Sections 4C.11.6.C.9. (Projecting Signs), 4C.11.6.C.5. (Marquee Signs), 4C.11.2. (Temporary Signs), 4C.11.1.E.3 (Original Art Murals, Vintage Original Art Murals & Public Art Installations).

SECTION 5. PROCEDURAL REQUIREMENTS.

A. **Building Permits.** The Los Angeles Department of Building and Safety (LADBS) shall not issue a permit for a sign, a sign structure, sign illumination, or alteration of an existing sign within the Sign District unless the sign complies with: (1) the requirements of this Ordinance

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as determined by the Director of Planning (Director); and (2) applicable requirements of the Code and State and federal laws.

B. Director Sign-Off Required. With respect to the following signs, only a ministerial Director Sign-Off on the permit application will be required prior to issuance by LADBS of a building permit for a sign within the Sign District. An application for a Digital Display or Supergraphic Sign should be submitted at the same time as an application for the new building or upgrades to an existing façade of a building on which such sign is proposed to be located, as feasible:

1. Digital Displays which are On-Site Signs

2. Supergraphic Signs which are On-Site Signs

The Director shall approve the permit if the sign is within the Sign District and otherwise complies with all the applicable requirements of this Ordinance and Appendix A (Conceptual Sign Plans), the applicable requirements of the Code, and State and federal laws. The Director's approval shall also be indicated by stamping and dating the permit plans.

C. Exempt Signs, Murals, and Art Installations. LADBS permit applications for the following sign types, Original Art Murals, and Public Art Installations shall be subject to LADBS review and approval, and/or Department of Cultural Affairs review and approval, and the applicable requirements of the Code, but are exempt from Director's review and do not require a Director's Sign-Off:

1. Awning Signs

2. Illuminated Canopy Sign

3. Marquee Signs

4. Monument Signs

5. Original Art Murals

6. Pedestrian Sign

7. Projecting Sign

8. Public Art Installations

9. Roof Signs

10. Temporary Signs

11. Wall Signs

12. Window Signs

D. Project Compliance. LADBS shall not issue a permit for the following signs unless the Director has issued a Project Compliance approval, pursuant to the procedures set forth in Section 13B.4.2 (Project Compliance) of the Code and the applicable standards set forth in Section 7 (General Requirements) and Section 8 (Standards for Specific Types of Signs) of

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this Ordinance. An application for a Digital Display or Supergraphic Sign should be submitted at the same time as an application for the new building or upgrades to an existing façade of a building on which such sign is proposed to be located, as feasible:

1. Digital Displays which are Off-Site Signs

2. Supergraphic Signs which are Off-Site Signs

E. Requests for Deviations, Modifications, and Interpretations of Regulations.

1. The procedures for adjustments, exceptions, and interpretations to this Ordinance shall follow the procedures set forth in Section 13B.4 (Specific Plan Implementation) of the Code. In addition, an adjustment process may be utilized for an adjustment to any sign locations which are not in substantial conformance with Appendix A (Conceptual Sign Plans), but otherwise are consistent with the intent and purposes of the Sign District, do not individually or in the aggregate exceed the size limits under Section 7.A.1 (Digital Displays, Sign Area) or Section 7.B.1 (Supergraphic Signs, Sign Area) of this Ordinance, and do not exceed any applicable illumination standards of the Sign District, Code, or other applicable law. For the purposes of this Ordinance, a sign shall be considered in substantial conformance if it is within one story in height on the vertical axis and 10 feet on the horizontal axis from the location depicted in Appendix A (Conceptual Sign Plans). However, under no circumstance may the location change of an Off-Site Sign be to a location that is primarily visible from the adjacent freeway.

2. The procedures for modifications of entitlement shall follow the procedures set forth in Section 13B.5.4 (Modification of Entitlement) of the Code. In addition, a Modification of Entitlement process may be utilized for a modification to any sign, any sign support structure or to the Appendix A (Conceptual Sign Plans) that results in a change of a sign from a Digital Display to a Supergraphic Sign.

3. The procedures for amendments of this Ordinance shall follow the procedures set forth in Section 13B.1.2 of the Code.

SECTION 6. GENERAL REQUIREMENTS.

A. General Requirements of Code. Unless specified in this Ordinance to the contrary, the general sign requirements set forth in the Code and the underlying CX3 Use District shall apply to this Sign District for permits, plans, design and construction, materials, street address numbers, identification, maintenance, prohibited locations and sign illumination. However, Digital Displays and Supergraphic Signs do not count towards the total sign area allocation of four square feet per linear foot of building frontage as identified in Section 4C.11.5.C.2 (Total Sign Area Allowed) of the Code. A building permit shall be obtained from LADBS, for any signs, sign structures, and/or sign alterations, other than changes to or replacement of sign face copy, in accordance with the applicable provisions of the Code.

B. Permitted Signs. Except as otherwise prohibited in Section 6.C (Prohibited Signs) of this Ordinance, and notwithstanding Section 4C.11.1.C.8 (Prohibited Signs) of the Code, all signs described and regulated in Section 7 (Standards for Specific Types of Signs) of this Ordinance, all signs otherwise permitted by the Code, and all previously legally permitted signs shall be permitted within the Sign District subject to applicable State and federal law.

C. Prohibited Signs. The following signs shall be prohibited:

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1. Inflatable Devices

2. Pole Signs

3. Any sign not specifically authorized by this Ordinance or by the Code or that does not comply with applicable State and federal laws

D. **Freeway Exposure.** Signs that adhere to the regulations of this Ordinance are exempt from Section 4C.11.1.C.6 (Freeway Exposure) of the Code.

E. **General Sign Area and Location Requirements.** The sign area and location of signage is subject to standards identified in Sections 6 (General Requirements) and Section 7 (Standards for Specific Types of Signs) of this Ordinance, Section 4C.11.1.C.9 (Prohibited Locations) of the Code, and applicable provisions of State and federal law, including the OAA and the Vehicle Code. In addition, no sign shall be placed over the exterior surface of any opening of a building, including its windows, doors, and vents, unless the Los Angeles Fire Department (LAFD) determines, in writing, that the sign would not create a hazardous condition.

F. **Illumination.** All signs may be illuminated by either internal or external means. The illumination regulations set forth in the Code shall apply except as set forth herein. Methods of signage illumination may include but are not limited to electric lamps, such as neon tubes; fiber optics; incandescent lamps; LED; LCD; cathode ray tubes exposed directly to view; shielded spotlights and wall wash fixtures. In addition, signage shall be subject to the following regulations:

1. **Lighting onto Residential Units.** All externally illuminated signs shall be designed, located, or screened so as to minimize to the greatest reasonable extent possible direct light sources onto any exterior wall of a residential unit. If signs are to be externally lit, the source of the external illumination shall be shielded from public view on adjoining or other residential or commercial lots.

2. **Sign Illumination Limitations.** In accordance with Section 4C.11.1.C.3 (Sign Illumination Limitations) of the Code, no sign shall be arranged and illuminated in a manner that will produce a light intensity of greater than three-foot candles above ambient lighting, as measured at the property line of the nearest residentially zoned property. However, sign illumination for Digital Displays and Supergraphic Signs shall be exempt from any applicable provisions from Section 4C.10.1 (Outdoor Lighting) of the Code.

3. **Reflective Materials.** Signage shall not use highly reflective materials such as mirrored glass.

4. **Green Code.** All light sources, including illuminated signage, shall comply with the applicable provisions of CALGreen (Part 11 of Title 24, California Code of Regulations), California Energy Code (Part 6 of Title 24, CCR) 130.3 and Section 140.8 and the Green Code of the City of Los Angeles.

5. **Digital Display Illumination Standards.**

   a. **Brightness.** Digital Displays shall have a nighttime luminance, from sunset to

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sunrise, no greater than 300 candelas per square meter (cd/m^2), all white, and a daytime brightness, from sunrise to sunset, no greater than 5,000 cd/m^2. The Digital Displays shall transition smoothly at a consistent rate from their daytime luminance to their maximum permitted nighttime luminance levels, beginning not less than 45 minutes prior to sunset, and concluding not more than 45 minutes after sunset. After sunrise, signs will transition smoothly from the applicable nighttime maximum luminance of 300 cd/m^2 for 45 minutes, up to their daytime luminance.

b. **Adjustment of Luminance.** Each Digital Display shall be fully dimmable and shall be controlled by a programmable timer so that luminance levels may be adjusted according to the time of day and applicable lighting standards.

c. **Beam Spread.** All light emitting diodes used within a Digital Display shall have a maximum horizontal beam spread of 165 degrees and maximum vertical beam spread of 90 degrees, facing primarily downwards and shall conform to the applicable provisions of the Code as well as federal and State laws, including the California Business and Professions Code and Vehicle Code.

G. Sign Illumination Plan. An initial signage illumination plan for the Digital Displays is provided as Appendix A (Conceptual Sign Plans), attached to Appendix K (Lighting Technical Study) in the SCEA (ENV-2018-3337-SCEA for the South Park Towers Project). No further signage illumination plan shall be required for signs that conform to the Appendix A (Conceptual Sign Plans). Signs that are not in conformance with the Appendix A (Conceptual Sign Plans) may be required, in addition to all other enforcement mechanisms and liabilities under the Code, to conform to a signage illumination plan imposed by the City or a court. If a new or revised signage illumination plan is required, it shall be submitted to the Director as part of the Project Compliance or other entitlement procedures for Digital Displays set forth in Section 5.D (Project Compliance) and Section 5.E (Requests for Deviations, Modifications, and Interpretations of Regulations) of this Ordinance. The signage illumination plan shall be prepared by a lighting design expert, and those portions of the plan setting forth the wattage draw must be certified and stamped by an electrical engineer certified by the State of California. The plan shall include specifications for all illumination, including maximum luminance levels, and shall provide for the review and monitoring of the displays by the City at the expense of the owner of the sign in order to ensure compliance with the regulations of this section.

1. **Illumination Testing Protocol for Digital Displays.** Prior to the operation of any Digital Display, the applicant shall conduct testing to indicate compliance with the illumination regulations of this Ordinance, and provide a copy of the results, along with a certification from an LADBS approved testing agency, to the Director and to LADBS stating that the testing results demonstrate compliance with the requirements of this Ordinance. The testing shall be at the applicant's expense and shall be conducted as follows:

   a. **Illuminance Testing.** In order to determine whether the illumination complies with the Code and the requirements of this Ordinance, a representative testing site shall be established on or next to those light sensitive receptors, as defined by the City's CEQA Guidelines, outside of the Sign District area, which have the greatest exposure to signage lighting on each of the four facades of the Project. A light meter mounted to a tripod at eye level, facing the project buildings, shall be calibrated and measurements taken to determine ambient light levels with the sign

on. A reading shall then be taken to determine the ambient light levels with the illuminated sign on and off. The difference between the two measurements shall be the amount of light the sign casts onto the sensitive receptor.

b. **Re-testing.** In addition, if as a result of a complaint or otherwise, LADBS may undertake a preliminary investigation and determine if it has cause to believe the Project's signage lighting is not in compliance with this Ordinance, the Code, or other applicable laws. LADBS may request, at the expense of the applicant or its successor, that the testing protocol outlined in this section be implemented to determine compliance. If the testing reveals that the signage is not in compliance with this Ordinance, the applicant or its successor shall immediately adjust the signage illumination to bring it into compliance and shall be subject to all of the enforcement provisions of the Code including administrative citations for continuing daily violations.

H. **Refresh Rate.** The Refresh Rate is the rate at which a Digital Display may change content. The Refresh Rates are as follows and shall apply to Digital Displays as set forth in Section 7.A (Standards for Specific Types of Signs, Digital Displays) of this Ordinance.

1. **Controlled Refresh Rate.** The Controlled Refresh Rate shall be no more frequent than one refresh event every eight seconds, with an instant transition between images. The sign image must remain static between refreshes.

2. **Full Animation.** Full Animation shall permit images, videos, animation, parts and/or illumination that change, move, stream, scroll, or otherwise incorporate motion to change at an unrestricted rate.

3. **Vehicular Safety Features**. Digital Displays which are visible from any public street shall incorporate the following measures:

a. Digital Displays shall not incorporate driver interaction features.

b. Digital Displays shall not use colors or images that replicate or could be confused with traffic safety signage.

c. Digital Displays shall not use stroboscopic or flashing images.

d. Digital Displays shall use dissolves for transitions between static and animated content.

I. **Visual Maintenance.** All signs shall be maintained to meet the following criteria at all times:

1. The building and ground area around the signs shall be properly maintained. All unused mounting structures, hardware and wall perforation from any abandoned/removed sign shall be removed and building surfaces shall be restored to their original condition.

2. All sign copy shall be properly maintained and kept free from damage and other unsightly conditions, including graffiti.

3. All sign structures shall be kept in good repair and maintained in a safe and sound condition and in conformance with all applicable codes.

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4. Razor wire, barbed wire, concertina wire, or other barriers preventing unauthorized access to any sign shall be hidden from public view.

5. No access platform, ladder, or other service appurtenance, visible from the sidewalk, street, or public right-of-way, shall be installed or attached to any sign structure.

6. Signs that are no longer serving the current tenants, including sign structures, shall be removed and the building facades originally covered by the signs shall be repaired and/or resurfaced with materials and colors that are compatible with the facades.

J. Hazard Review.

1. In connection with the adoption of this Ordinance, the City has completed the initial review otherwise required under Section 4C.11.1.C.5 (Hazard to Traffic) of the Code for signs that adhere to the specifications set forth in this Ordinance and, therefore, shall require no further hazard or Code compliance review, except as set forth below.

2. In the event: (i) any Digital Display is not in substantial conformance with the Appendix A (Conceptual Sign Plan); (ii) any sign does not adhere to the requirements of this Ordinance or requires an adjustment, exception or amendment to this Ordinance; or (iii) any sign that utilizes New Technologies, as set forth in Section 6.K (New Technologies) of the Ordinance, the proposed sign will require a permit from LADBS; and prior to submission to LADBS, must be submitted to the Los Angeles Department of Transportation (LADOT) for hazard evaluation and determination per Section 4C.11.1.C.5 (Hazard to Traffic) of the Code. Until LADOT determines that any such sign, individually or in the aggregate with other signs authorized under this Ordinance, do not constitute a hazard, LADBS shall not issue a permit for the sign or sign structure.

3. The City retains all rights to regulate all signs or to change the regulations applicable to any sign or to the Sign District created by this Ordinance without compensation to the owner or operator of the sign or any property within the Sign District, or any other person or entity. In the event the City receives evidence or otherwise reasonably believes that any sign, including any sign that is in substantial conformance with the Appendix A (Conceptual Sign Plans) and adheres to the requirements of this Ordinance, is or is being operated in a manner that is, or otherwise constitutes, a hazard to the safe and efficient operation of vehicles upon a street or a freeway, or which creates a condition that endangers the safety of persons or property, the City may act immediately to address the hazard or danger without compensation to the owner or operator of the sign or any property within the Sign District, or any other person or entity. In addition, LADBS may refer any sign to LADOT for hazard evaluation and determination per Section 4C.11.1.C.5 (Hazard to Traffic) of the Code, and the City may order the suspension or modification of operations of any sign pending the LADOT's hazard review and determination without compensation to the owner or operator of the sign or any property within the Sign District, or any other person or entity. If LADOT determines that a sign constitutes a hazard or creates a hazard or danger to traffic, pedestrians or other persons or property, the City may make the suspension or modification of the hazardous operation of the sign permanent without compensation to the owner or operator of the sign or any property within the Sign District, or any other person or entity.

K. New Technologies. The Director may permit the use of any technology or material which did not exist as of the effective date of this Ordinance, provided that the material is approved by LADBS and that the technology or material is permitted under applicable State and federal

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laws, utilizing the Director's Interpretation procedure outlined in Section 13B.4.6 (Specific Plan Interpretation) of the Code, if the Director finds that such technology or material is consistent with the regulations described herein.

L. Alterations, Repairs or Rehabilitation. Any alteration, repair or maintenance work on a legally permitted sign or sign structure shall be governed by the Code and applicable State and federal laws.

M. Materials. The materials, construction, application, location and installation of any sign shall be in conformance with the Los Angeles Building Code and the Los Angeles Fire Code.

SECTION 7. STANDARDS FOR SPECIFIC TYPES OF SIGNS.

A. Digital Displays. Digital Displays shall comply with the following regulations:

1. Sign Area. An individual Digital Display shall not exceed 1,800 square feet in sign area. The total combined area of all Digital Displays in the Sign District shall not exceed 3,168 square feet in area.

2. Number and Location. Digital Displays shall be installed in substantial conformance with the number and locations identified in the Appendix A (Conceptual Sign Plans), provided that the total of all Digital Displays shall not exceed 3,168 square feet. For the purposes of this Ordinance, a sign shall be considered in substantial conformance if it is within one story on the vertical axis and 10 feet on the horizontal axis from the location depicted in the Appendix A (Conceptual Sign Plans), provided that a Lighting Study demonstrates that the Digital Display conforms with all illumination standards of this Ordinance. In addition, any location for a Digital Display in the Appendix A (Conceptual Sign Plans) may instead be replaced with a Supergraphic Sign.

3. Design.

a. Digital Displays may use grid lights, cathode ray projections, light emitting diode displays, plasma screens, liquid crystal displays, fiber optics, or other electronic media or technology developed in the future but may not include strobe lights, flashing lights, revolving beacon, or any other technology that interferes with traffic safety or visibility or is prohibited by applicable State or federal law.

b. Digital Displays shall be integrated into the architectural design of the building and shall align with major building elements such as window banding or vertical changes in material or texture. Signs which are in substantial conformance as to the design indicated in the Appendix A (Conceptual Sign Plans) are deemed to meet the requirement for architectural compatibility.

4. Illumination. Digital Displays shall be internally illuminated and subject to the applicable illumination standards of Section 6 (General Requirements) of this Ordinance.

5. Refresh Rates and Operation.

a. Digital Displays visible from the freeway shall be subject to Controlled Refresh Rate.

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b. Digital Displays not visible from the freeway may be permitted the Full Animation Refresh Rate.

c. Digital Displays shall operate only during the time period beginning at 7:00 a.m. and ending at 12:00 a.m.

d. No Digital Display shall be made operative until a Certificate of Occupancy has been issued for the building on which the Digital Display is located.

6. **On-Site and Off-Site Standards.** Digital Displays may be On-Site or Off-Site Signs. Sections 4C.11.3.C.1 (Location), 4C.11.3.C.2 (Area), 4C.11.3.C.3 (Height), and 4C.11.3.C.4 (Spacing) of the Code for Off-Site Signs shall not apply.

7. **Sign Reduction Program.** As set forth under Section 8 (Sign Reduction) of this Ordinance, no building permit shall be issued for any Off-Site Digital Display prior to approval of a Sign Reduction Plan and Project Compliance for that sign, incorporating the terms and sign reduction ratios of Section 8 (Sign Reduction) of this Ordinance. Digital Displays that are On-Site Signs are exempt from this requirement.

B. Supergraphic Signs. Supergraphic Signs shall comply with the following regulations:

1. **Sign Area.** In lieu of a Digital Display as permitted under Section 7.A of this Ordinance, a Supergraphic Sign may instead be permitted. The replacement Supergraphic Sign would then be subject to the sign area limitations for Digital Displays, as indicated in Section 7.A above.

2. **Number and Location.** Replacement Supergraphic Signs shall be installed in substantial conformance with the number and locations identified in the Appendix A (Conceptual Sign Plans), provided that the total of all Digital Displays or replacement Supergraphic Signs shall not exceed 3,168 square feet. For the purposes of this Ordinance, a sign shall be considered in substantial conformance if it is within one story on the vertical axis and 10 feet on the horizontal axis from the location depicted in the Appendix A (Conceptual Sign Plans).

3. **Design.**

a. A Supergraphic Sign that is comprised of vinyl or other material may be attached to a wall with an adhesive or by mechanical means approved by LADBS and the LAFD, if applicable.

b. Supergraphic Signs comprised of mylar or other film-like transparent material, such as perforated vinyl, may be applied directly to windows subject to the provisions of Section 6.D of this Ordinance.

c. Supergraphic Signs may adhere to windows provided that such signs have been scored into ten smaller portions for each glass panel that the sign covers or as otherwise approved by the LAFD.

d. Supergraphic Signs shall not obstruct outward views from windows.

e. Supergraphic Signs shall be integrated into the architectural design of the building and shall align with major building elements such as window banding or

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vertical changes in material or texture. Signs which are in substantial conformance as to the design indicated in Appendix A (Conceptual Sign Plans) are deemed to meet the requirement for architectural compatibility.

4. **Illumination.** Supergraphic Signs may be non-illuminated, or externally illuminated with the light source shielded from view.

5. **Operation.** No Supergraphic Sign shall be installed until a Certificate of Occupancy has been issued for the building on which the Supergraphic Sign is located.

6. **On-Site and Off-Site Standards.** Supergraphic Signs may be On-Site or Off-Site Signs. Sections 4C.11.3.C.1 (Location), 4C.11.3.C.2 (Area), 4C.11.3.C.3 (Height), and 4C.11.3.C.4 (Spacing) of the Code for Off-Site Signs shall not apply.

7. **Sign Reduction Plan.** As set forth under Section 8 (Sign Reduction) of this Ordinance, no building permit shall be issued for any Off-Site Supergraphic Sign prior to approval of a Sign Reduction Plan and Project Compliance for that sign, incorporating the terms and sign reduction ratios of Section 8 of this Ordinance. Supergraphic Signs that are On-Site Signs are exempt from this requirement.

SECTION 8. SIGN REDUCTION.

Sign reduction is required for all Digital Displays and Supergraphic Signs that are Off-Site Signs. An applicant shall seek approval of a Sign Reduction Plan by filing a Project Compliance application with the Director, pursuant to Section 13B.4.2 (Project Compliance) of the Code. The application shall demonstrate compliance with the following requirements:

A. **Removal of Off-Site Signage**. A property owner or ground lessee within the Sign District area shall be permitted to install Digital Displays and Supergraphic Signs that are Off-Site Signs only if the property owner or ground lessee demonstrates the removal of existing, legally permitted Off-Site Signs, including non-conforming Off-Site Signs, in existence as of the effective date of this Ordinance, that are removed from any other property located within the boundaries of Council District 14 or the Downtown Community Plan, based upon the following sign reduction ratios:

   1. **Supergraphic Signs.** Each square foot of new Supergraphic Sign area shall be offset by a minimum reduction of one square feet of existing Off-Site Sign area.

   2. **Digital Displays.** Each square foot of new Digital Display sign area shall be offset by a minimum reduction of two square feet of existing Off-Site Sign area.

B. **Proof of Legal Status, Removal Rights and Indemnification.** At the time of application for each Off-Site Sign, the Sign Reduction Plan shall not be approved unless the applicant submits the following with the application form:

   1. **Valid Building Permit.** A valid building permit, to the extent available, demonstrating that the sign to be removed constitutes a legal use.

   2. **Property Owner's Statement.** A written statement from the owner of the property from which the sign(s) will be removed, and the owner of the sign(s) to be removed, attesting that they have the legal right to remove the sign at issue and agree that once removed, the sign(s) at issue may not be reinstalled. This written statement must be signed under

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penalty of perjury and notarized.

3. **Indemnification.** An executed agreement from the applicant promising to defend and indemnify the City against any and all legal challenges filed by a third party relating to the removal of the sign(s).

C. Proof of Sign Removal. With respect to each removed Off-Site Sign, the applicant shall submit a final demolition permit and photographic evidence that such sign has been removed prior to the issuance of any building permit for any Off-Site Digital Display or Supergraphic Sign subject to this Section of this Ordinance.

D. Transfer of Rights. The removal of Off-Site signage pursuant to this Section shall not be used to install signs on any property outside of this Sign District, or in violation of the requirements of this Ordinance. Under no circumstances shall the removal of Off-Site signage be credited more than once for the approval of an Off-Site Digital Display or Supergraphic Sign within the Sign District.

SECTION 9. SEVERABILITY.

If any provision of this Ordinance or its application to any person or circumstance is held to be unconstitutional or otherwise invalid by any court of competent jurisdiction, the invalidity shall not affect other provisions, clauses or applications of said Ordinance, which can be implemented without the invalid provision, clause or application, and to this end, the provisions and clauses of this Ordinance are declared to be severable. The City Council hereby declares that it would have passed this Ordinance and each portion or subsection, sentence, clause and phrase herein, irrespective of the fact that any one or more portions, subsections, sentences, clauses or phrases be declared invalid.

SECTION 10.

The City Clerk shall certify to the passage of this Ordinance and have it published in accordance with Council policy, either in a daily newspaper circulated in the City of Los Angeles or by posting for ten days in three public places in the City of Los Angeles: one copy on the bulletin board located at the Main Street entrance to the Los Angeles City Hall; and one copy on the bulletin board located at the Main Street entrance to the Los Angeles City Hall East; and one copy on the bulletin board located at the Temple Street entrance to the Los Angeles County Hall of Records.

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SOUTH PARK TOWERS SIGN DISTRICT

APPENDIX A - CONCEPTUAL SIGN PLAN

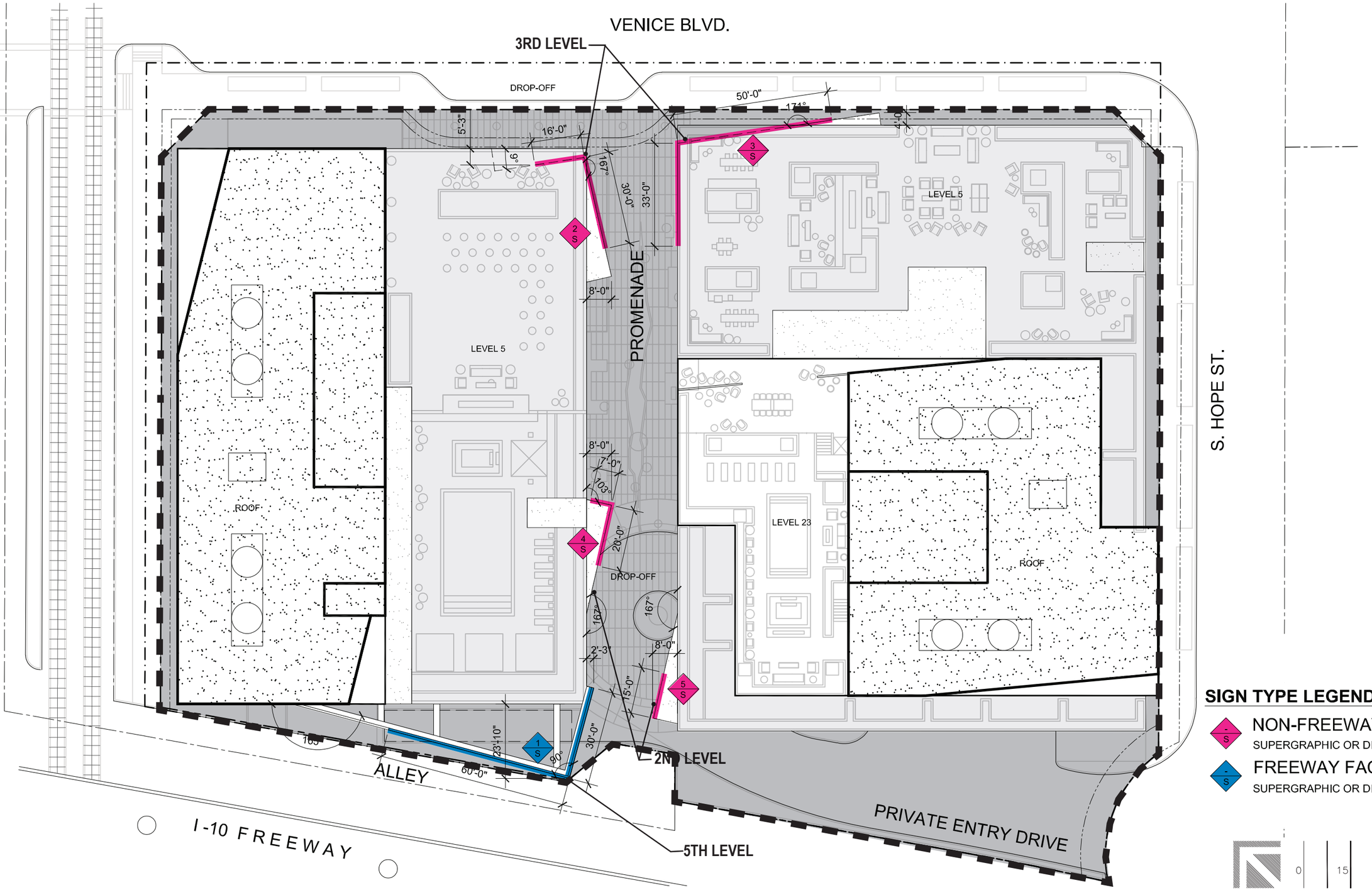
SHEETS

01 Sign Matrix
02 Sign Plan
03 Aerial View from South
04 Sign 1 (Freeway Heading East)
05 Sign 1 (Freeway Heading West)
06 Signs 2 & 3
07 Signs 2 & 3
08 Street View from North
09 Freeway View
10 Aerial View from North
11 Aerial View from South

SIGN TYPE	ID #	SIGN HEIGHT	SIGN WIDTH	MAX ANGLE FROM WALL	MAX PROJECTION FROM WALL	AREA PER SIGN FACE	TOTAL AREA PER SIGN	HEIGHT TO BOTTOM	HEIGHT TO TOP	FREEWAY FACING / VISIBLE	LEVEL
SUPERGRAPHIC SIGN OR DIGITAL DISPLAY	S-1	20FT	60FT	165°	23FT10IN	1200 SF	1800 SF	45FT	65FT	YES	5
		20FT	30FT	165°	2FT3IN	600 SF					
SUPERGRAPHIC SIGN OR DIGITAL DISPLAY	S-2	8FT	16FT	9°	-5FT3IN	128 SF	268 SF	27FT	35FT	NO	3
		8FT	30FT	167°	8FT	240 SF					
SUPERGRAPHIC SIGN OR DIGITAL DISPLAY	S-3	8FT	50FT	171°	4FT	400 SF	664 SF	27FT	35FT	NO	3
		8FT	33FT	0°	0FT	264 SF					
SUPERGRAPHIC SIGN OR DIGITAL DISPLAY	S-4	8FT	7FT	103°	8FT	56 SF	216 SF	17FT	25FT	NO	2
		8FT	20FT	167°	8FT	160 SF					
SUPERGRAPHIC SIGN OR DIGITAL DISPLAY	S-5	8FT	15FT	167°	8FT	120 SF	120 SF	17FT	25FT	NO	2

NOTE: STRUCTURAL PLANS AND CALCULATIONS STAMPED AND SIGNED BY A LICENSED ENGINEER SHOWING THE SIGN CONSTRUCTION MATERIALS AND METHOD(S) OF ATTACHMENT TO THE BUILDING SHALL BE PROVIDED AT TIME OF PERMIT.

NOTE: 8-SECOND REFRESH RATE FOR FREEWAY FACING SIGN IF DIGITAL.



SIGN TYPE LEGEND

- NON-FREEWAY FACING / VISIBLE
  SUPERGRAPHIC OR DIGITAL DISPLAY SIGN
- FREEWAY FACING / VISIBLE
  SUPERGRAPHIC OR DIGITAL DISPLAY SIGN

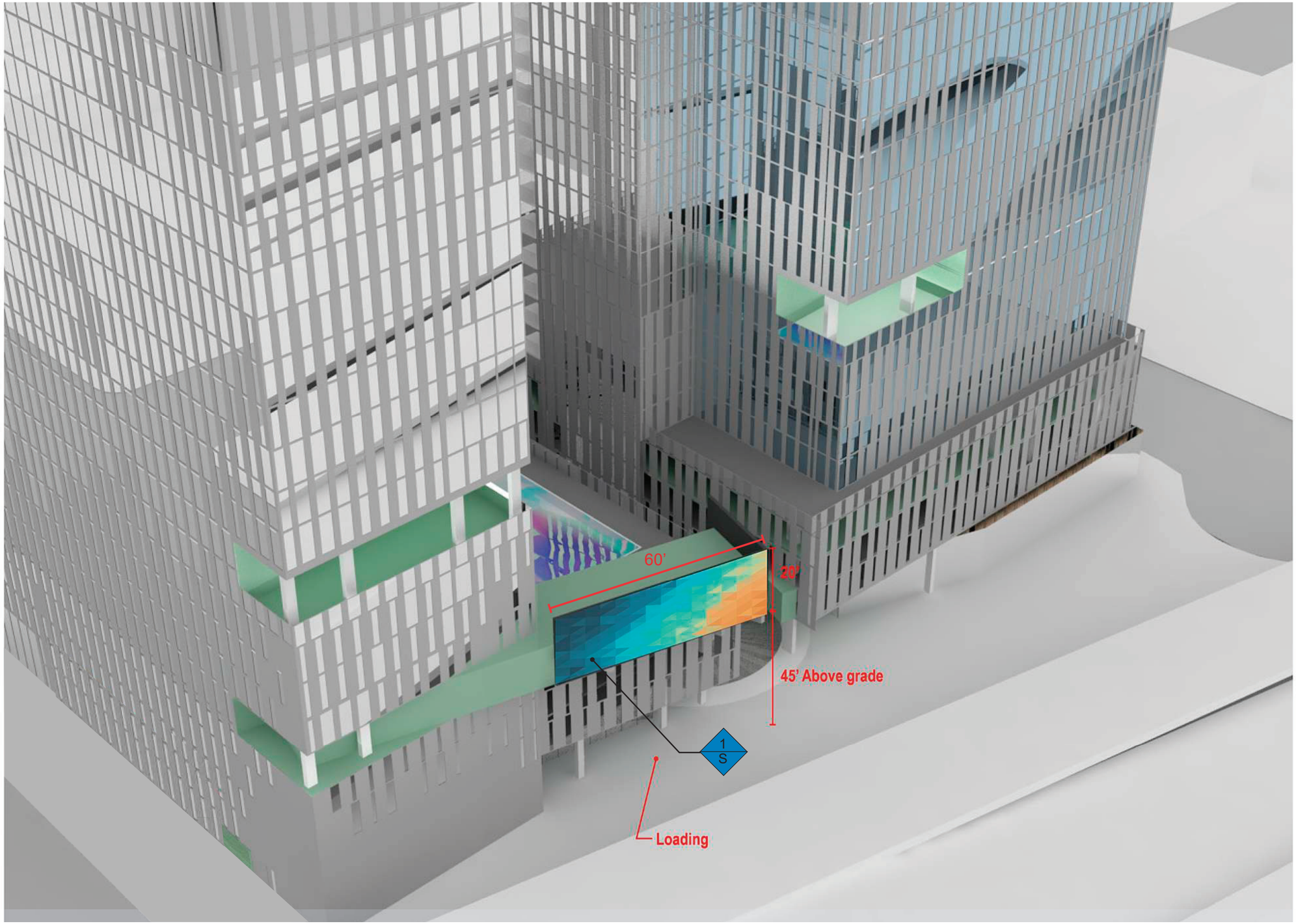
0 15 30 60 ft

02

Ground Level Plan

South Park Towers Sign District
Appendix A - Conceptual Sign Plan

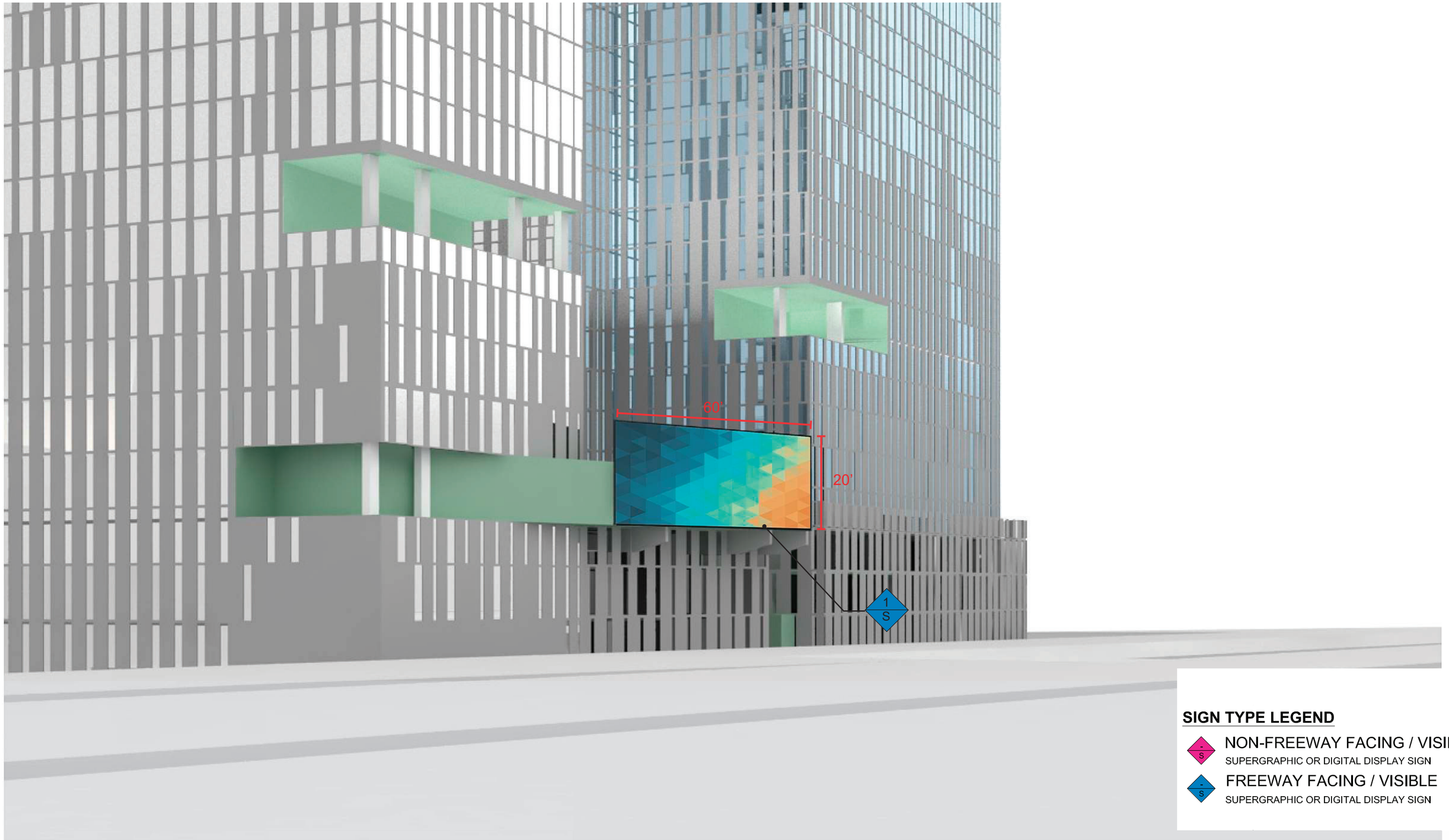
05 29 25



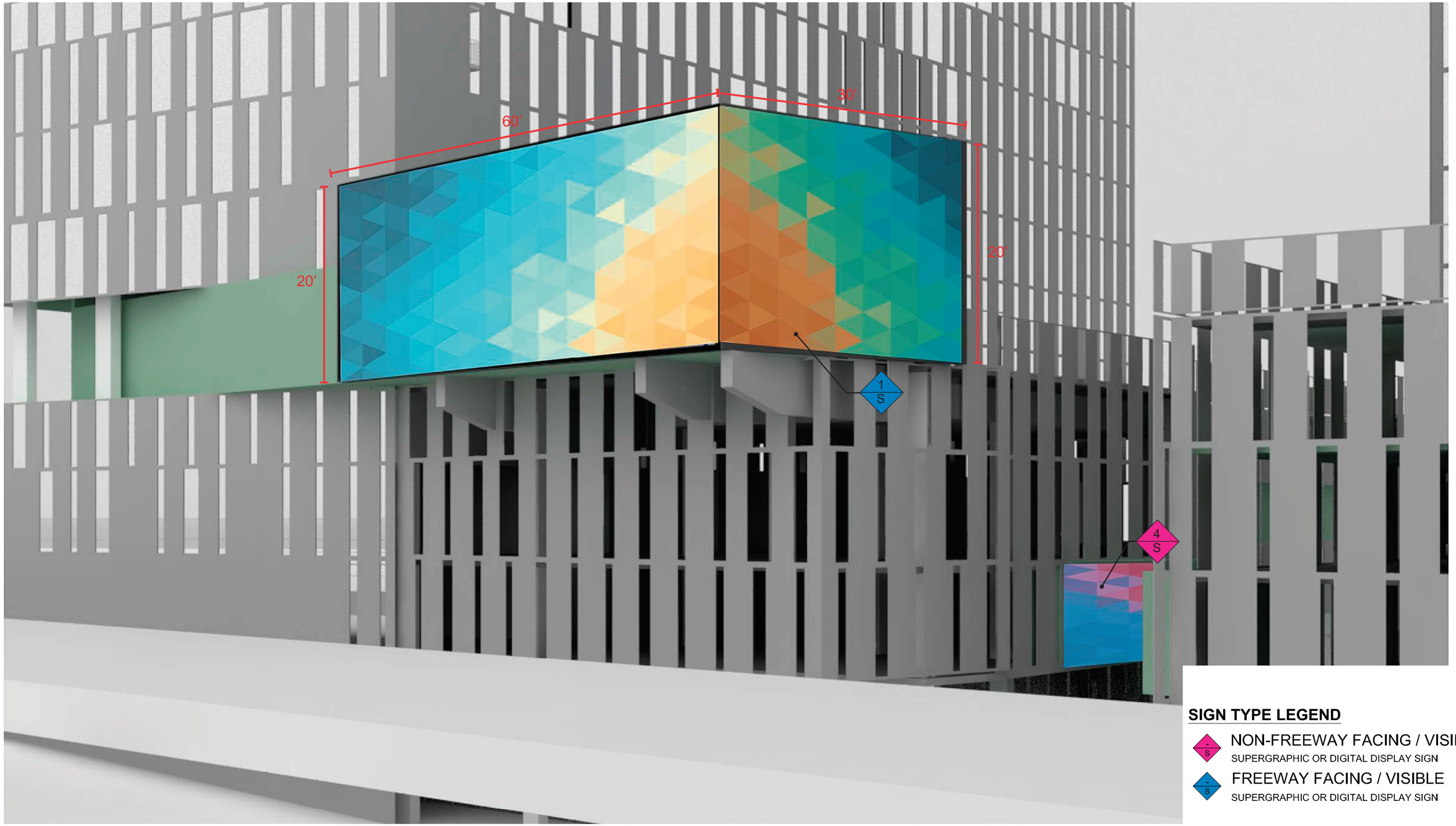
SIGN TYPE LEGEND

- NON-FREEWAY FACING / VISIBLE
  SUPERGRAPHIC OR DIGITAL DISPLAY SIGN
- FREEWAY FACING / VISIBLE
  SUPERGRAPHIC OR DIGITAL DISPLAY SIGN

	03	Aerial View from South	South Park Towers Sign District Appendix A - Conceptual Sign Plan	
			05 29 25	



	04	Sign 1 (Freeway Heading East)		South Park Towers Sign District Appendix A - Conceptual Sign Plan
				05 29 25



SIGN TYPE LEGEND

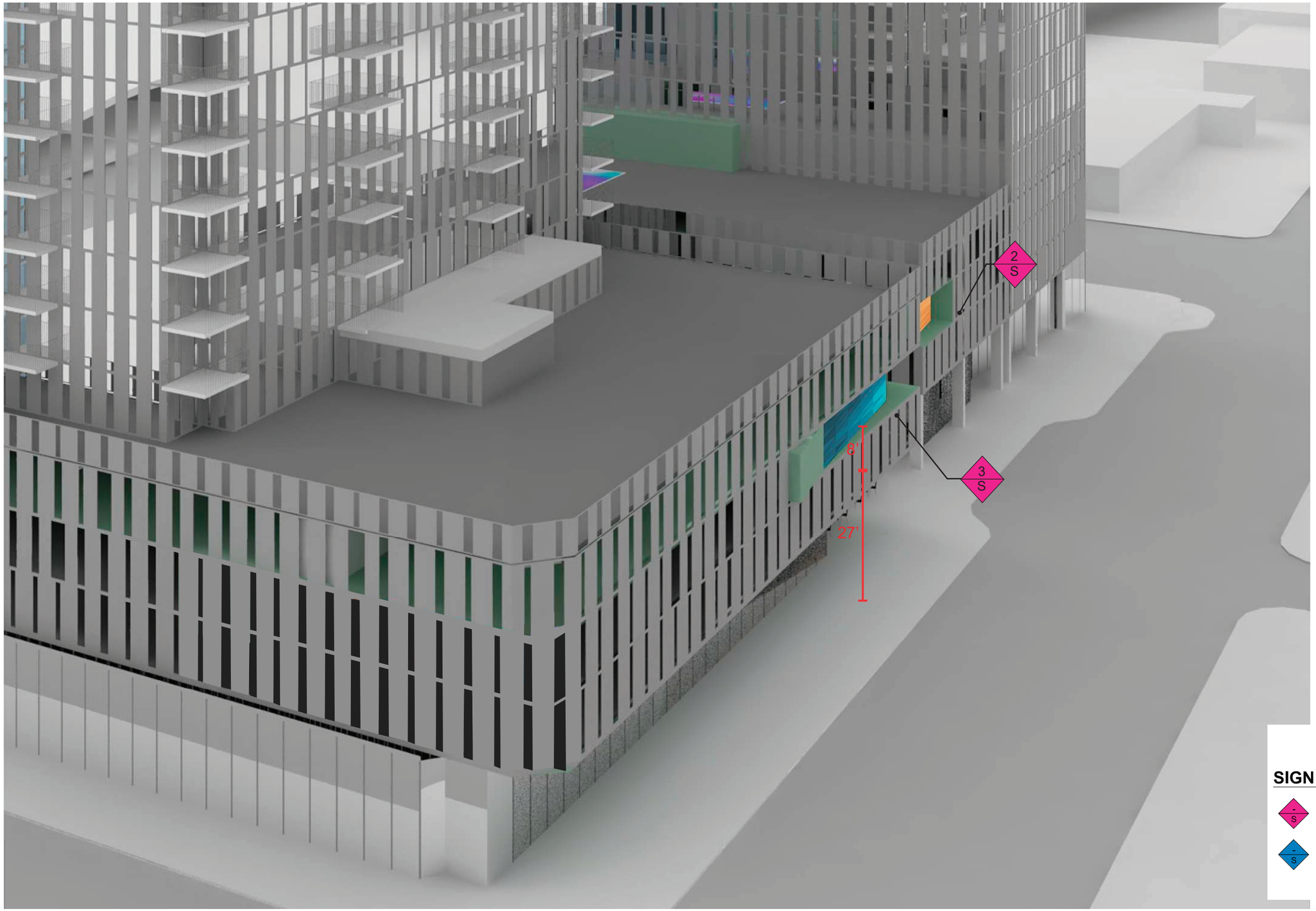
- NON-FREEWAY FACING / VISIBLE
  SUPERGRAPHIC OR DIGITAL DISPLAY SIGN
- FREEWAY FACING / VISIBLE
  SUPERGRAPHIC OR DIGITAL DISPLAY SIGN

	05	Sign 1 (Freeway Heading West)	South Park Towers Sign District Appendix A - Conceptual Sign Plan	
			05 29 25	

SIGN TYPE LEGEND

- NON-FREEWAY FACING / VISIBLE
  SUPERGRAPHIC OR DIGITAL DISPLAY SIGN
- FREEWAY FACING / VISIBLE
  SUPERGRAPHIC OR DIGITAL DISPLAY SIGN

	06	Signs 2 & 3	South Park Towers Sign District Appendix A - Conceptual Sign Plan
			05 29 25



SIGN TYPE LEGEND

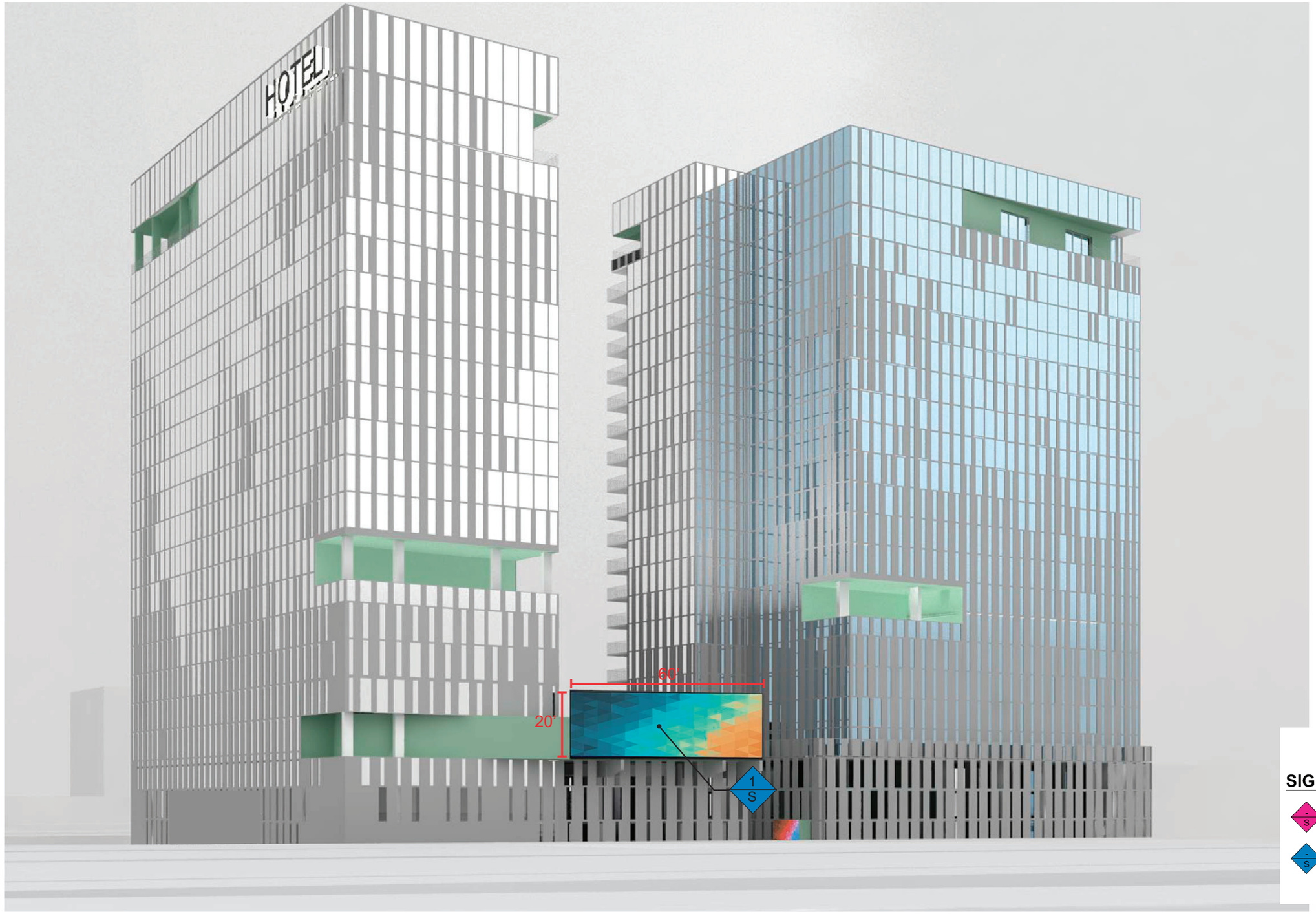
- NON-FREEWAY FACING / VISIBLE
  SUPERGRAPHIC OR DIGITAL DISPLAY SIGN
- FREEWAY FACING / VISIBLE
  SUPERGRAPHIC OR DIGITAL DISPLAY SIGN

	07	Signs 2 & 3	South Park Towers Sign District Appendix A - Conceptual Sign Plan	
				05 29 25

SIGN TYPE LEGEND

- NON-FREEWAY FACING / VISIBLE
  SUPERGRAPHIC OR DIGITAL DISPLAY SIGN
- FREEWAY FACING / VISIBLE
  SUPERGRAPHIC OR DIGITAL DISPLAY SIGN

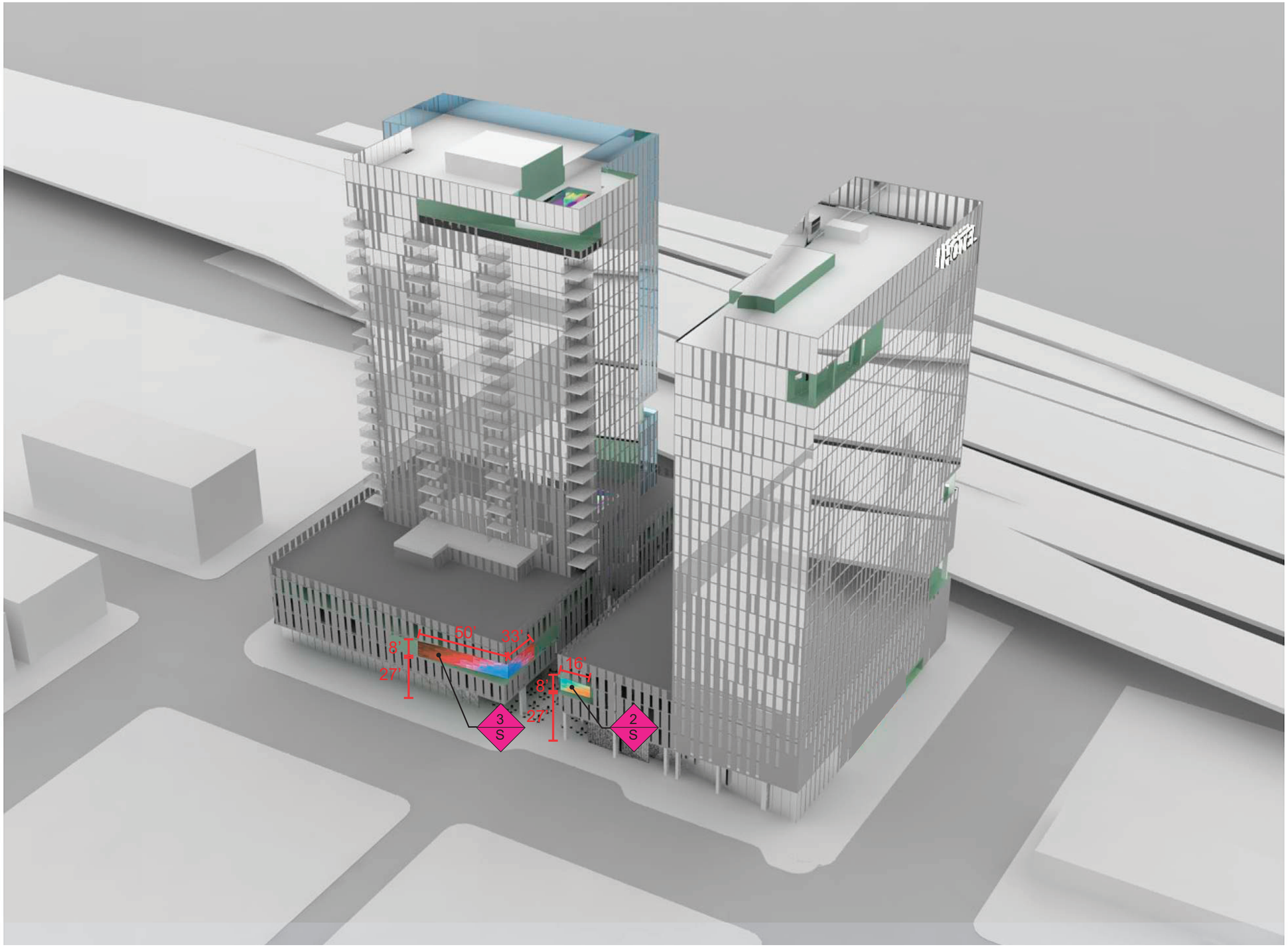
	08	Street View from North	South Park Towers Sign District Appendix A - Conceptual Sign Plan	
			05 29 25	



SIGN TYPE LEGEND

- NON-FREEWAY FACING / VISIBLE
  SUPERGRAPHIC OR DIGITAL DISPLAY SIGN
- FREEWAY FACING / VISIBLE
  SUPERGRAPHIC OR DIGITAL DISPLAY SIGN

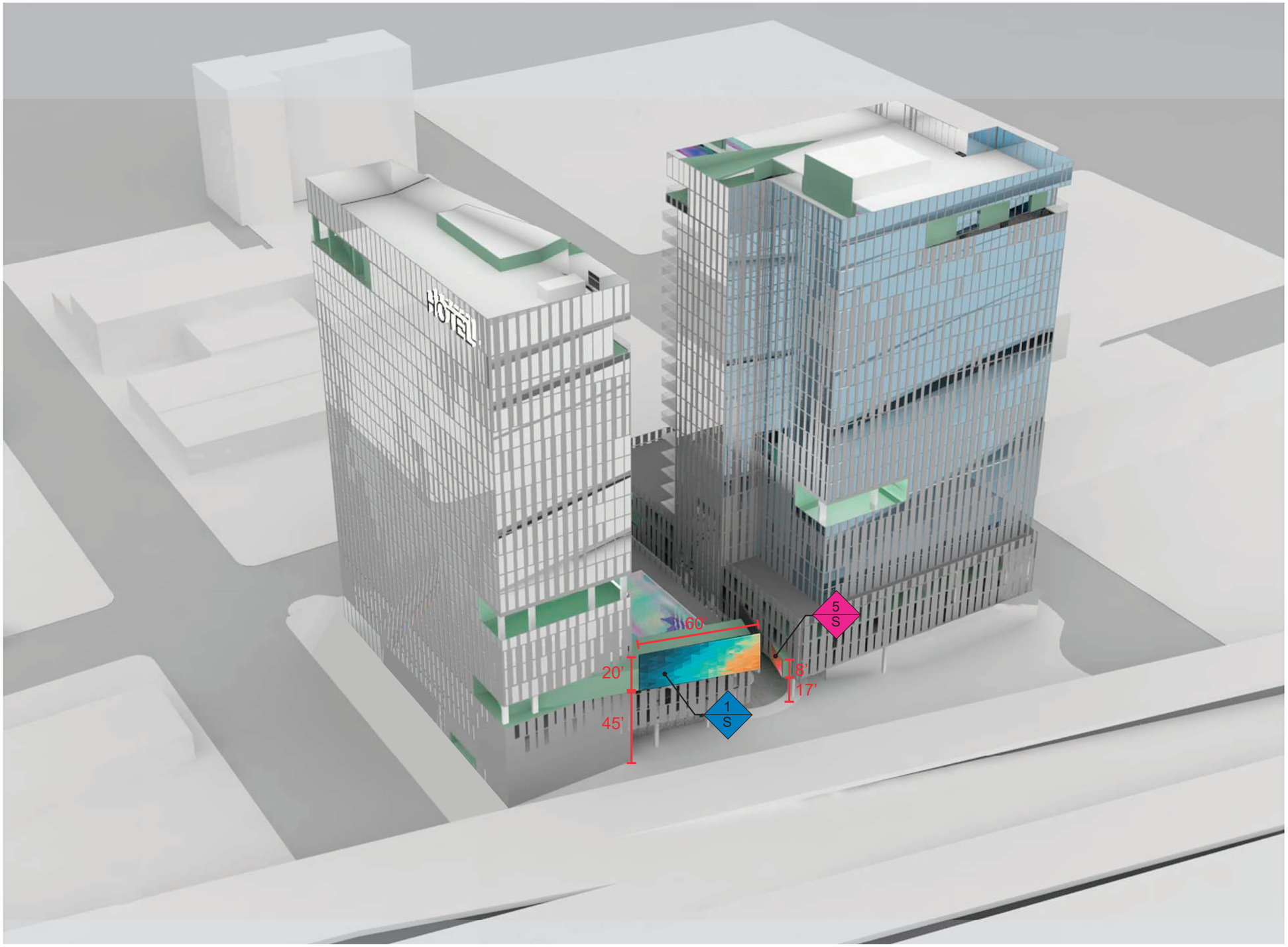
	09	Freeway View	South Park Towers Sign District Appendix A - Conceptual Sign Plan	
			05 29 25	



SIGN TYPE LEGEND

- NON-FREEWAY FACING / VISIBLE
  SUPERGRAPHIC OR DIGITAL DISPLAY SIGN
- FREEWAY FACING / VISIBLE
  SUPERGRAPHIC OR DIGITAL DISPLAY SIGN

	10	Aerial View from North	South Park Towers Sign District Appendix A - Conceptual Sign Plan	
			05 29 25	



SIGN TYPE LEGEND

- NON-FREEWAY FACING / VISIBLE
  SUPERGRAPHIC OR DIGITAL DISPLAY SIGN
- FREEWAY FACING / VISIBLE
  SUPERGRAPHIC OR DIGITAL DISPLAY SIGN

	11	Aerial View from South		South Park Towers Sign District Appendix A - Conceptual Sign Plan
				05 29 25

EXHIBIT E

SCEA RESPONSES TO RESCINDED COMMENTS

CPC-2018-3336-SN-TDR-CUB-SPR-MSC

July 10, 2025

Responses To Rescinded Comment Letters On The South Park Towers Project Sustainable Communities Environmental Assessment [ENV-2018-3337-SCEA]

RESCINDED COMMENT LETTERS

COMMENT LETTER NO. 1A

UNITE HERE Local 11
GK Law
Jordan R. Sisson
801 South Grand Avenue, 11th Floor
Los Angeles, CA 90017
November 21, 2023

COMMENT LETTER NO. 1B

UNITE HERE Local 11
GK Law
Jordan R. Sisson
801 South Grand Avenue, 11th Floor
Los Angeles, CA 90017
November 23, 2023

COMMENT LETTER NO. 2A

Western States Regional Council of Carpenters (WSRCC)
Mitchell M. Tsai Law Firm
Reza Bonachea Mohamadzadeh
139 South Hudson Avenue, Suite 200
Pasadena, CA 91101
November 20, 2023

COMMENT LETTER NO. 2B

Western States Regional Council of Carpenters (WSRCC)
Mitchell M. Tsai Law Firm
Mitchell M. Tsai, Esq.
139 South Hudson Avenue, Suite 200
Pasadena, CA 91101
November 29, 2023

ATTACHMENTS:

B: Bracketed Comment Letters

The comments included herein have been rescinded by their respective commenters. Thus, the accompanying responses to comments are for informational purposes only and should not be considered formal responses to comments under CEQA.

COMMENT LETTER NO. 1A

UNITE HERE Local 11
GK Law
Jordan R. Sisson
801 South Grand Avenue, 11th Floor
Los Angeles, CA 90017
November 21, 2023

COMMENT 1A-1

On behalf of UNITE HERE Local 11 ("Local 11"), this office respectfully provides the following comments[1] to the City of Los Angeles ("City") regarding the Sustainable Communities Environmental Assessment ("SCEA")[2] for the proposed demolition of four commercial office/retail buildings at a 75,503 square-foot ("sf") site located at 1600 S. Flower St. ("Site") and the construction over 32 months of a two-tower, 452,630-sf mixed use development ("Project"), including: (i) a 22-story, 300-room hotel with ground floor restaurants on the western portion of the Site ("Tower 1"); and (ii) a 23-story, 250-dwelling unit residential building with 10,000-sf of ground floor medical offices on the eastern portion of the Site ("Tower 2").

In furtherance of the Project, Venice Hope Group, LLC ("Applicant") is seeking various project approvals under the Los Angeles Municipal Code ("LAMC" or "Code") under DCP Case No. CPC-2018-3336-SN-TDR-CUB-SPR-MSC, including: (a) Transfer of Floor Area Rights in the amount of 226,121 sf ("TFAR"); (b) alcohol-related Conditional Use Permit ("CUB"); (c) Site Plan Review for the 250 dwelling units and 300-room hotel ("SPR"); (d) Director's Determination to ten percent reduction in usable open space ("DD"); (e) a 20 percent decrease in the required parking for the hotel ("MSC"); and (f) to establish a new Sign District to permit offsite signage ("SN") (collectively "Entitlements"). (SCEA, pp. 6, 55.) Additionally, under DCP Case No. VTT-82213, the Applicant is seeking a Vesting Tentative Tract Map to create one ground lot and four airspace lots ("VTTM"). (Id.) Furthermore, for the purposes of the California Environmental Quality Act ("CEQA"),[3] the City is considering the adoption of the SCEA dated October 2023 ("SCEA").[2(sic)]

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1 Herein, page citations are either the stated pagination (i.e., "p. #") or PDF-page location (i.e., "PDF p. #")

2 Inclusive of all associated appendices ("APP-##") retrieved from City-controlled website. (See https://planning.lacity.org/development-services/environmental-review/scea/south-park-tower-project).

3 Including "CEQA Guidelines" codified at 14 Cal. Code. Regs. § 15000 et seq.

RESPONSE TO COMMENT 1A-1

This comment introduces the commenter and restates the Project description and associated discretionary entitlement requests. It should be noted that this comment letter was rescinded as shown in Commenter Letter 1B, below. Nevertheless, it is incorporated into the administrative record along with Response to Comments 1A.2 through 1A.41, below.

COMMENT 1A-2

In short, the SCEA has several defects, such as relying on outdated and seemingly inaccurate data. The reliance on poor data infects the SCEA's emissions modeling, which is central to the air quality and greenhouse gas ("GHG") analysis. Additionally, the SCEA relies on a vehicle mile traveled ("VMT") analysis that utilizes questionable modeling and thresholds. So too, the noise and vibration analyses are outdated and fail to consider multiple factors potentially masking construction and operational impacts. Furthermore, the Project fails to incorporate key sustainability strategies, such as LEED certification, CalGreen Tier 1 or 2 status, or adding any onsite solar. Also troubling is the deferred analysis and mitigation of potential exposure to hazardous vapor intrusion of tetrachloroethene ("PCE") and trichloroethene ("TCE"), which have been detected in soil vapor tests onsite, which should be addressed before the City approves the Project. Furthermore, the SCEA does not consider potential land use inconsistencies with the hotel- specific CUP requirement for all downtown hotels adopted by the City Council.

Collectively, these errors may conceal potentially significant Project impacts and allow for avoidance of additional mitigation measures to be included in the proposed Mitigation Monitoring Program ("MMP"), such as those identified in the Southern California Association of Governments ("SCAG") 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy ("RTP/SCS") Program Environmental Impact Report ("PEIR").[4] As such, the Project does not incorporate all feasible mitigation measures set forth in the 2020 RTP/SCS PEIR Mitigation Monitoring and Reporting Program ("MMRP"),[5] as is required for a SCEA. (See Pub. Res. Code § 21155.2(a).)

For these reasons, Local 11 respectfully asks the City to stay action on the Entitlements, VTT, and SCEA (collectively "Project Approvals") until the various errors are cured in a CEQA-compliant recirculated SCEA that incorporates additional mitigation, outlined in Section H below (see pages 31-35)

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4 https://scag.ca.gov/sites/main/files/file-attachments/fpeir_connectsocal_complete.pdf?1607981618.

5 https://scag.ca.gov/sites/main/files/file-attachments/exhibit-a_connectsocal_peir.pdf?1606004156.

RESPONSE TO COMMENT 1A-2

As addressed in the detailed responses below, the commenter's assertion that the SCEA relies on inaccurate and outdated data is incorrect. The specific comments pertaining to the adequacy

of the SCEA, including potentially significant impacts relating to air quality, GHG emissions, land use consistency, VMTs, and noise are all addressed in greater detail below. The critical issue in determining whether recirculation is required is whether any new information added to the negative declaration or SCEA is "substantial revision." (CEQA Guidelines Section 15073.5(b)). A "substantial revision" of the negative declaration shall mean: (1) a new, avoidable significant effect is identified and mitigation measures or project revisions must be added in order to reduce the effect to insignificance, or (2) the lead agency determines that the proposed mitigation measures or project revisions will not reduce potential effects to less than significance and new measures or revisions must be required. Additionally, recirculation is not required under the following circumstances: (1) mitigation measures are replaced with equal or more effective measures pursuant to CEQA Guidelines Section 15074.1; (2) new project revisions are added in response to written or verbal comments on the project's effects identified in the proposed negative declaration or SCEA, which are not new avoidable significant effects; (3) measures or conditions of project approval are added after circulation of the negative declaration, which are not required by CEQA or do not create new significant environmental effects and are not necessary to mitigate an avoidable significant effect; or (4) new information is added to the negative declaration, which merely clarifies, amplifies, or makes insignificant modifications to the negative declaration.

As further discussed below, nothing presented by the commenter meets the specific criteria necessitating recirculation of the SCEA. Therefore, there is no specific or general basis in law that requires the City to recirculate the SCEA.

COMMENT 1A-3

I. LOCAL 11'S STANDING

Local 11 represents more than 25,000 workers employed in hotels, restaurants, airports, sports arenas, and convention centers throughout Southern California and Phoenix—including *thousands of members who live and/or work in the City*. The union has a First Amendment right to petition public officials in connection with matters of public concern, including compliance with applicable zoning rules and CEQA, just as developers, other community organizations, and individual residents do. Protecting its members' interest in the environment, including advocating for the environmental sustainability of development projects and ensuring the availability of housing and hotels (in compliance with state and local rules), is part of Local 11's core function. Recognizing unions' interest and union members' interest in these issues, California courts have consistently upheld unions' standing to litigate land use and environmental claims. (See *Bakersfield Citizens v. Bakersfield* (2004) 124 Cal.App.4th 1184, 1198.) Furthermore, Local 11 has public interest standing to challenge the Project Approvals given the City's public duty to comply with applicable zoning and CEQA laws, which Local 11 seeks to enforce. (See e.g., *Rialto Citizens for Responsible Growth v. City of Rialto* (2012) 208 Cal.App.4th 899, 914-916, n6; *La Mirada Avenue Neighborhood Assn. of Hollywood v. City of Los Angeles* (2018) 22 Cal.App.5th 1149, 1158-1159; *Weiss v. City of Los Angeles* (2016) 2 Cal.App.5th 194, 205-206; *Save the Plastic Bag Coalition v. City of Manhattan Beach* (2011) 52 Cal.4th 155, 166, 169–170.)

RESPONSE TO COMMENT 1A-3

This comment provides the commenter's statement of interest with respect to representing the Local 11 labor union.

COMMENT 1A-4

II. SPECIFIC PROJECT/SCEA COMMENTS

Under "The Sustainable Communities and Climate Protection Act of 2008" ("SB 375"), lead agencies may prepare a streamlined CEQA clearance (i.e., SCEA) for qualifying transit priority projects ("TPP(s)") that are consistent with SCAG's RTP/SCS PEIR. To qualify, a proposed project must ***first*** meet the four TPP criteria and, ***second***, must incorporate all feasible mitigation measures, performance standards, and criteria set forth under the RTP/SCS. (See Pub. Res. Code §§ 21155 & 21155.2; see also SCEA, pp. 2-3.) Project-level mitigation measures included in this PEIR's MMRP (or comparable measures) should be required by the local lead agency as appropriate and feasible. (MMRP, p. 1.) Here, the SCEA analysis suffers fundamental flaws that underestimate Project impacts and mask the need for additional project-level mitigation, which is required in order to utilize an SCEA.

RESPONSE TO COMMENT 1A-4

The above comment provides information from the State CEQA Guidelines regarding the qualifying criteria for SCEAs. The commenter states the SCEA analysis is flawed and underestimates Project impacts. The specific issues and comments substantiating the commenter's viewpoints are presented in the comments below and are appropriately responded to in detail below.

COMMENT 1A-5

A. The Project Description, Environmental Setting, and Related Projects List Need to be Updated

An "'accurate, stable and finite project description is the ***sine qua non*** of an informative and legally sufficient EIR.'" (*San Joaquin Raptor Rescue Ctr. v. Cnty. of Merced* (2007) 149 Cal.App.4th 645, 654-655 [quoting *Cnty. of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 199] [emphasis in original].) As one court explained, "only through an accurate view of the project may affected outsiders and public decision-makers balance the proposal's benefit against its environmental cost, consider mitigation measures, assess the advantage of terminating the proposal (i.e., the 'no project' alternative), and weigh other alternatives in the balance." (*Citizens for a Sustainable Treasure Island v. City & Cnty. of San Francisco* (2014) 227 Cal.App.4th 1036, 1052.) Hence, an accurate project description is an "indispensable component of a valid EIR." *(Western Placer Citizens for an Agr. and Rural Env't v. Cnty. of Placer* (2006) 144 Cal.App.4th 890, 898.) Here, information in the SCEA seems dated, stale, or unclear, such as the following issues.

1. *The Construction Timeline Is Facially Inaccurate*

SCEA claims that the 32-month construction will start in mid-2023. (SCEA, p. 51.) However, it is nearly 2024 and, thus, that statement is facially inaccurate.

RESPONSE TO COMMENT 1A-5

The commenter states the Project's anticipated construction timeline is inaccurate. The Project Application was filed with Department of City Planning on June 11, 2018, and the preparation of the SCEA has been ongoing since 2018. Therefore, the 32-month construction schedule was anticipated to begin in 2023, with project completion expected by 2026. Section 15125 of the State CEQA Guidelines provides the following guidance for establishing the baseline:

> *"An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant."*

Consistent with this guidance, the SCEA accurately identified an anticipated 32-month construction schedule to begin in 2023. Although the expected start date of construction has passed, the anticipated construction schedule is estimated for the purposes of quantifying air quality and greenhouse gas (GHG) emissions. The changes to the proposed construction start date does not materially affect the results of the analysis as the construction emissions are based on the duration of each phase of construction and the volume and type of construction equipment being utilized. Those attributes of the construction process would not change. Furthermore, due to the fact that off-road construction equipment is required to comply with the In-Use Off-Road Diesel-Fueled Fleets Regulation, which phases out older and higher-emitting off-road engines each year, heavy duty construction equipment anticipated to be in operation in 2024 and beyond would be more efficient than equipment operating in 2023. Therefore, updating the SCEA's analysis to reflect a construction schedule beginning in 2024 or later would result in a reduction of overall construction emissions. As such, the SCEA's analysis is conservative in estimating construction emissions, and no further analysis is warranted.

COMMENT 1A-7

2. *The Designated Construction Recycling Operator Is Likely Unavailable*

The SCEA claims that construction debris would be transferred and recycled at Downtown Diversion. (Id. at PDF p. 60, 82, 161, 171, 385.) However, the operator's (Waste Management) lease at that property ends at the end of this year (2023), and it is not likely to operate in the near future, as known by the City's L.A. Sanitation and Environment, Solid Resources Citywide Recycling Division).[6] This assumption in the air/GHG emissions modeling under CalEEMod must be remedied. (SCEA, APP-A2, PDF p. 82.)

[6] Per emails with LA Sanitation and Environment, Solid Resources Citywide Recycling Division, which can be provided upon request.

RESPONSE TO COMMENT 1A-7

The commenter states the recycling facility referenced in the SCEA, the Waste Management Downtown Diversion, which accepts construction and demolition (C&D) debris, may be unavailable to serve the project at the time of construction. If this facility is unavailable during the Project's construction phase, an alternate facility that also accepts C&D material is the CWS DTLA Material Recovery Facility and Transfer Station facility, located at 3720 Noakes Street, approximately six miles to the east of the Project Site.[1],[2] As a conservative estimate, the Air Quality Modeling and Greenhouse Gas Emissions worksheets estimated a hauling distance of 29 miles to a disposal site during the demolition phase (see page 72 in Appendix A.2 of the SCEA). Therefore, the air quality analysis and GHG emissions provided in the SCEA are conservative, and the alternate facility is within the scope of the SCEA analysis and would, therefore, not result in a new impact that was not disclosed in the SCEA.

COMMENT 1A-8

3. *The VMT Analysis Is Nearly Four Years Old*

The SCEA relies on a VMT analysis conducted back in December 2019. (SCEA, APP-F1, PDF p. 16.) That was nearly four years ago, well before COVID shifted transit trends, and based on an older model utilized by the Los Angeles Department of Transportation ("LADOT") Transportation Assessment Guidelines ("TAG"),[9] commonly referred to as the City's "VMT Calculator" (updated most recently to VMT Calculator 1.4 in 2023).[10] This modeling needs to be updated.

[9] LADOT (Aug. 2022) TAG, https://drive.google.com/file/d/1hqmpAR_HIeB1gj4QK8ZEkSU1gqKO6BhZ/view.

[10] See https://ladot.lacity.org/businesses/development-review#transportation-assessment; see also LADOT (4/17/20) Pandemic-Related Updates to LADOT's Transportation Assessment Requirements, p. 2 (noting the anticipated revised 1.3 version to be release by June 2020), https://ladot.lacity.org/sites/default/files/documents/ladot-tag-pandemic-related-updates-april-17-2020_0.pdf.

RESPONSE TO COMMENT 1A-8

A VMT Analysis was prepared for the Project, dated December 9, 2019 (see attachment F.1 of the SCEA). The VMT Analysis concluded the Project would cause significant VMT impacts for

[1] Construction and Demolition Debris Recycling Facilities List in Los Angeles County, website: https://pw.lacounty.gov/epd/CD/cd_attachments/Recycling_Facilities.pdf, accessed June 2024.

[2] Cal Recycle SWISS Facility/Site Documents online database, at https://secure.calrecycle.ca.gov/SWISDocument/Document/Details/457858, accessed June 2024.

both Household VMT and Work VMT prior to mitigation, but with the incorporation of Mitigation Measures MM T-1, MM T-2, and MM T-3, which include trip reduction promotion and marketing, shared mobility, and unbundled parking, the Project's VMT impacts would be reduced to less-than-significant levels. Furthermore, the City of Los Angeles Department of Transportation (LADOT) prepared a correspondence of approval for the VMT Analysis, signed January 6, 2020 (see Appendix F.1 of the SCEA). The VMT Analysis utilizes the VMT methodology and thresholds of significance that were in effect at the time of analysis and adequately applied mitigation measures to reduce impacts to less-than-significant levels. Since the proposed land use size and configuration of the Project would not change and the VMT was reviewed and approved by the LADOT using the most current methodology and thresholds available at the time of analysis, an additional VMT analysis using an updated version of the LADOT's VMT Calculator is not legally required under CEQA.

Notwithstanding the above, for informational purposes the Proposed Project's VMT impacts were reevaluated using the most current version (Version 1.4) of the LADOT's VMT Calculator as requested. (See Response to Comment 1A-22 and Appendix B to the SCEA Erratum). Based on the updated VMT calculations, the Project's VMT impacts would be similar to the findings reported in the SCEA in that the VMT impacts would be less than significant after mitigation for both Household and Employee VMT. Therefore, because the level of VMT impacts would be less than significant and similar to the findings presented in the SCEA, recirculation of the SCEA is not warranted.

COMMENT 1A-9

4. The Noise Measurements Are Outdated

The SCEA relies on ambient noise data acquired back in September 2018 and February 2019 (SCEA, APP-E, PDF pp. 4, 10) before COVID and the enduring prevalence of remote working. The increase of at-home workers has had the effect of reducing vehicles on the road (and its associated traffic noise contributing to ambient levels) and potentially increases residents' exposure to construction noise near their homes while they are working from home (therefore making day/hour restrictions less effective).

RESPONSE TO COMMENT 1A-9

The commenter states the noise measurements obtained for the SCEA are outdated.

Based on the LAMC Section 111.01, "ambient noise" is defined as:

> *"composite of noise from all sources near and far in a given environment, exclusive of occasional and transient intrusive noise sources and of the particular noise source or sources to be measured. Ambient noise shall be averaged over a period of at least 15 minutes at a location and time of day comparable to that during which the measurement is taken of the particular noise source being measured."*

Existing ambient daytime noise levels are provided in Appendix E of the SCEA. The ambient noise measurements represent the existing baseline conditions for the Project Site at the time of analysis. As stated above in response to comment 1A.5, *"An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant."* (Section 15125 of the State CEQA Guidelines). There is no legal basis to require a reassessment of the baseline conditions after the baseline measurements were recorded. Therefore, the Project is not required to obtain updated ambient noise measurements. Additionally, although the commenter calls into question the validity of the baseline measurements, the commenter fails to provide any analysis or supporting evidence to suggest that a change in assessing the baseline noise levels would result in a new significant environmental impact.

The commenter's claim that the increase in remote work arrangements post-Covid would increase residents' exposure to construction noise is also unsupported. As discussed on page 310 of the SCEA, eight of the ten sensitive receptors identified within 500 feet of the Project Site included residential uses. Impacts upon these sensitive receptors were evaluated based on full occupancy of those units, without any regard to whether residents were home or away. Thus, the claim that more people would be occupying these nearby residential land uses is unrelated to the impact analysis, which classified them as sensitive receptors regardless of occupancy. As concluded in the SCEA, construction impacts upon sensitive receptors would be reduced to less-than-significant levels after mitigation. As such, no changes to the SCEA's noise analysis are required.

COMMENT 1A-10

5. The Excavated Material Assumptions Should Be Substantiated

The SCEA states that there will be only 28,000 cubic yards of excavated materials. (SCEA, pp. 161, 375.) This seems to assume no more than 10 feet below the grade of excavation at the approximate 75,500-sf Project Site to accommodate the subterranean parking levels under the two towers. (Id., at pp. 7, 21, 26, 255, 283, 285-286.) However, excavation and grading could reach as low as 25 feet below grade, if not lower. (SCEA, APP-B2, PDF pp. 16, 19, 22, 24, 38.) Underestimating excavation could lead to faulty air quality and GHG modeling, which relies on the assumed cubic yardage for construction haul trips. (SCEA, APP-A2, PDF pp. 75.)

RESPONSE TO COMMENT 1A-10

The commenter states the excavated material estimated in the SCEA should be higher because the Geotechnical Investigation provided in Appendix B-2 to the SCEA stated that the excavation and grading can reach as low as 25 feet below grade. As noted on page 2 of the Geotechnical Investigation, the Geotechnical Investigation was based on preliminary information about the Project provided by the Applicant and did not include formal plans depicting the proposed

development. The report conservatively assumed the Project would consist of a high-rise development with up to two towers with maximum height of 240 feet underlain by two levels of subterranean parking. As detailed in SCEA Section C, Description of Project on page 19, the Project proposes one basement level for building storage and utilities beneath the residential and hotel towers. The excavation area would be limited to the area beneath the tower footprints, equal to approximately 32% (24,758 square feet) of the Project Site. Additionally, on page 19 of the Geotechnical Investigation, it states "[f]or the purposes of this report, the foundation depth has been assumed to be 25 feet below the existing ground surface", which represents a conservative approach because the analysis investigated the soil profile to a deeper depth than what is now proposed.

Based on the footprint tower dimensions shown in Figure 2.6 Proposed Plot Plan, the hotel and residential tower building footprints have a combined surface area of 50,600 square feet. Assuming an excavation depth of 10 feet below grade, the total soil export is estimated to be 18,740 cubic yards.[3] Therefore, it is conservatively assumed that the Project would export no more than approximately 28,000 cubic yards of export, as confirmed by the Applicant and analyzed in the SCEA. As such, no changes to the analysis are required.

COMMENT 1A-11

6. The Related Projects List May be Incomplete

The SCEA claims only nine related projects within one-quarter mile of the Project Site, associated with DCP case numbers dating back as old as 2008. (SCEA, pp. 52-54.[11]) However, it is unclear why only one-quarter mile was used as compared to a greater radius (e.g., 0.5 mile - 1.5 mile) as used in other City CEQA reviews,[12] similar to the Project's initial traffic analysis that identified 153 related projects back in late-2018 within 1.5 miles of the Project Site. (SCEA, APP-F2, pp. 53-54.) Additionally, it is unclear whether that information is based on applications submitted "through October 16, 2018" or biweekly case filings from "2020 to 2022[,]" which cannot be verified since source documents do not appear to be included in the SCEA or in the traffic appendix (Id., at p. 53; see also APP-F.1.) Moreover, it seems that several nearby projects were not included, such as the five projects listed on the DCP case filing map located roughly within the area enclosed by Pico Blvd., Washington Blvd., Main St. and the 110 Freeway.[13] Furthermore, based on the City's geographic information system ("ZIMAS"), there are over 40,800 addresses and 670 unique DCP case numbers within 1500 feet of the Project Site, including 90+ DCP case filings exclusive of this Project and the above-described nine related projects (listed in the SCEA) and five nearby projects (not listed in the SCEA).[14]

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[3] The hotel tower footprint is approximately 131 feet by 175 feet (22,925 square feet). The residential tower footprint is approximately 150 feet by 184.5 feet (27,675 square feet). The combined surface area of the area to be excavated is 50,600 square feet. (50,600 sf x 10 ft deep = 506,000 ft^3 /27 = 18,740 cubic yards). An additional 50% was factored in to allow for a conservative estimate factoring in expansion and over excavation (18,740 x 1.5 = approx. 28,000 cy).

[11] Associate DCP Case Nos. for Related Project No. 1 (ZA-2016-15-SPR-ZV-TDR, ENV-2016-16-MND); No. 2 (DIR-2014-1580-TDR-SPR, ENV-2014-1581-MND); No. 3 (CPC-2008-596-GPA-ZC-SPR, ENV-2008-386-MND); No. 4 (DIR-2017-4-TDR-SPR, ENV-2017-5-MND); No. 5 (DIR-2016-2476-TDR-SPR, ENV-2016-2477-MND); No. 6 (DIR-2019-1492-TDR-SPR, ENV-2019-1493-EAF); No. 7 (DIR-2017-5308-SPR, ENV-2017-5309-CE); No. 8 (DIR-2019-7676-TDR-TOC-SPR-WDI, ENV-2019-7677-CE); and No. 9 (DIR-2021-1011-TDR-TOC-SPR-WDI- VHCA, ENV-2021-1012-CE).

[12] See e.g., 400 San Vicente Project (Nov. 2023) SCEA, p. 2-35, https://planning.lacity.org/odocument/af988237-2143-427a-a7e5-90871d923fbf/SCEA.pdf; 1201 N. Gower Street (Sep. 2023) SCEA, p. 2-32, https://planning.lacity.org/odocument/b625f91f-10c9-484b-ab37-e06df4a4bedf/SCEA.pdf; 4th and Hewitt Project (May 2022) Draft EIR, pp. III-3 – III-12, https://planning.lacity.org/eir/4th-and-Hewitt/deir/HTML%20Files/images/DEIR_Sections/III._Env_Set.pdf.

[13] See DCP Case Filing Report Map (such as: (1) 5-story auto dealership [DCP Case Nos. DIR-2022-5446-SPR, ENV-2020-999-EAF]; (2) 9-story, auto dealership [DCP Case Nos. DIR-2022-8452-SPR, ENV-2022-8453-EAF]; (3) 667,878-sf new car dealership [DCP Case Nos. ADM-2021-781-CPIOC, DIR-2021-710-SPR, DIR-2020-998-SPR, ENV-2020-999-EAF]; (4) 7-story, 235-unit mixed use building [DCP Case Nos. ZA-2020-366-ZV, DIR- 2017-1212-SPR, ENV-2017-1213-MND]; (5) 38-story, 775-room hotel [DCP Case Nos. DIR-2020-455-ACI, CPC-2016-2595-DA-CU-MCUP-CUX-SPR, ENV-2016-2594-EIR]), https://planning.lacity.org/resources/case-reports.

[14] ZIMAS (11/18/23) Case Number Report, PDF pp. 342 (including the following 90+ case filings: ADM-2019- 4587-CPIOC, ADM-2019-6039-UDU, ADM-2019-7528-CPIOC, ADM-2020-1146-CPIOC, ADM-2020-1162- CPIOC, ADM-2021-10803-CPIOC, ADM-2021-1551-CPIOC, ADM-2022-4574-CPIOC, ADM-2023-133-CPIOC, ADM-2023-134-CPIOC, ADM-2023-2163-CPIOC, CPC-2016-4146-TDR-SPR, CPC-2016-4219-GPA-ZC, CPC- 2016-4220-SN, CPC-2017-2107-MSC, CPC-2017-400-GPAJ-VZCJ-HD-VCU-TDR-SPR, CPC-2017-432-CPU, CPC-2017-746-HD-TDR-MCUP-ZAD-SPR-GPA-VZC, CPC-2017-747-DA, CPC-2018-6005-CA, CPC-2019-4572-VZC- HD-SPP-SPPA-SN, DIR-2016-1478-SPPA, DIR-2021-1714-SPP-SPPA, DIR-2021-4394-WDI, DIR-2023-2616- SPP, ENV-2017-2108-CE, ENV-2017-401-EAF, ENV-2017-433-EIR, ENV-2017-4648-CE, ENV-2017-748-EIR, ENV-2018-1263-CE, ENV-2018-2294-EIR, ENV-2018-6006-CE, ENV-2019-4121-ND, ENV-2023-1602-CE, ZA- 2016-2593-CU-MCUP-CUX-SPR, ZA-2018-1262-ZV, ZA-2018-2293-MCUP-CUX-ZV-ZAD-SPR, ZA-2023-1601- CUB, CPC-2008-2363-GPA-ZC-HD-CU-CUB-ZV-SPR, CPC-2009-2677-SP-ZC-DA, CPC-2012-1665-TDR-ZV-SPR, CPC-2012-2311-DA, CPC-2013-910-GPA-SP-CA-MSC, CPC-2014-1915-SP, CPC-2014-1916-DA, DIR-2008- 3545-SPR, DIR-2011-2633-TDR-SPR, DIR-2012-149-SPR, DIR-2012-1830-TDR-SPR, DIR-2013-2849-RV, DIR-2013-357-SPR, DIR-2013-359-SPR, DIR-2013-3921-SPR, DIR-2014-1795-SPPA-SPP, DIR-2015-2901-SPR, ENV-2008-1780-EIR, ENV-2008-1781-EIR, ENV-2008-2257-MND, ENV-2008-2271-MND, ENV-2008-3199- CE, ENV-2008-432-MND, ENV-2008-4505-ND, ENV-2009-2993-MND, ENV-2009-3285-CE, ENV-2010-1293- CE, ENV-2010-214-ND, ENV-2010-2279-CE, ENV-2010-3213-CE, ENV-2010-3407-MND, ENV-2011-1487-EIR, ENV-2011-2373-CE, ENV-2011-585-EIR, ENV-2012-1470-EIR, ENV-2012-150-MND, ENV-2012-1666-MND, ENV-2012-1831-MND, ENV-2012-3032-MND, ENV-2013-2850-CE, ENV-2013-3170-CE, ENV-2013-3392-CE, ENV-2013-358-MND, ENV-2013-3922-MND, ENV-2013-911-EIR, ENV-2014-4136-MND, ENV-2015-2902- MND, ENV-2016-3059-CE, ENV-2016-4147-EAF, ZA-2008-3286-ZV-SPR, ZA-2009-2992-CUB-CUX-CU, ZA-2010-3406-ZV, ZA-2012-3031-ZV, ZA-2014-4135-CUB, ZA-2017-4647-CU), https://zimas.lacity.org/reports/86ac2739367246b28b88e8cb98133057.pdf.

RESPONSE TO COMMENT 1A-11

The commenter questions the lead agencies rationale for determining the study radius to identify related projects and identifies a number of other property addresses and City planning case numbers that were not included in SCEA's cumulative impact analysis. Pursuant to CEQA

Guidelines Section 15130(b)(3), lead agencies should define the geographic scope of the area affected by the cumulative effect and provide a reasonable explanation for the geographic limitation. Thus, CEQA expressly permits the City to determine the geographic scope for a cumulative impact analysis. The City utilized a ¼-mile radius for cumulative impacts, which is consistent with Department of City Planning practices for analyzing localized cumulative impacts. Generally, the assessment of localized construction impacts is limited to an area within 500 feet of the Project Site. Projects located farther than 500 feet in an urban environment such as Downtown Los Angeles are typically shielded from the Project Site by existing buildings and roadways, which serve to diminish cumulative effects. As noted in the source note within Table 2.7, Related Projects List, in the SCEA the the SCEA utilized both the related projects provided in the Transportation Study that fell within a ¼-mile radius of the Project Site (filings through October 2018) and accounted for more recent related projects filed by the City between 2020 and 2022. Further, it should be noted that many of the additional case filings cited in this comment are associated with administrative policy actions, use permits, and environmental clearances that do not involve new construction. In some cases multiple case filings may also be associated with the same project. Therefore, the SCEA provided a current related projects list.

COMMENT 1A-12

7. Existing Building Square Footage and Current Uses Need Clarification

The SCEA claims the existing Project Site includes four retail/office buildings totaling 89,510 square feet (see SCEA, Tbl. 2.1 [figure below left]), but ZIMAS indicates the four buildings total 60,573 square feet (see ZIMAS[13] [figure below right]).

Address	Building Size (Square Feet)	Use
1600-1601 S. Flower Street	15,300	Retail
1616 S. Flower Street	15,000	Retail
1601-1611 S. Hope Street	43,710	Retail / Office [a]
1617 S. Hope Street	15,500	Retail
1623 S. Hope Street	-	Surface Parking
Total	89,510 sf	

Notes:
Sf = Square feet
[a] The existing uses within this building are comprised of approximately 1,799 square feet (sf) of office space and 41,911 square feet of retail space
Sources: http://zimas.lacity.org/,accessed February 2019; City of Los Angeles Department of Building and Safety, and O.K.O. Engineering, Inc., ALTA/ACSM Land Title Survey, November 1, 2012.

Building 1	
Year Built	1917
Building Square Footage	15,138.0 (sq ft)
Building 2	
Year Built	1960
Building Square Footage	16,880.0 (sq ft)
Building 3	
Year Built	1921
Building Square Footage	21,855.0 (sq ft)
Building 4	
Year Built	1947
Building Class	CX
Number of Units	0
Number of Bedrooms	0
Number of Bathrooms	0
Building 5	
Year Built	1962
Building Square Footage	6,700.0 (sq ft)

The Applicant's SPR application states the buildings have 61,291 square feet of industrial uses (SPR Application,[14] p. 1 [see figure right]), similar to what the Phase I report conducted in September 2017, citing 68,273 sf of various uses (APP-D, PDF p. 7 [see figure below] & p. 871 [Phase II confirming 68,278-sf]).

PROJECT	NON-RESI (List each USE on
Uses ∋∋∋	Industrial
Existing Development	61,291
Demolition (&)	61,291
New Construction (%)	13,120
Net Change (∀)	-48,171
Total Project	13,120

13 https://zimas.lacity.org/?loc=MTI0LTVBMjA1ICA1Ngo1MTM0MDA4MDA2CjE2MTggUyBGTE9XRVIgU1QKCjY0Nzk0NzAuMzkxODM5NzAyLDE4MzQ3MjkuMjc1MTEyOTg1OSw2NDgyNDI2LjY0MTgzOTcwMSwxODM2Mjc1LjEwODQ0NjMxOTEKMTI0LTVBMjA1ICA1Ng%3D%3D.

14 https://planning.lacity.org/pdiscaseinfo/document/NDgxMTI0/6d189c69-33a8-4be1-9414-6b0ce5c25431/esubmit.

RESPONSE TO COMMENT 1A-12

The commenter discusses discrepancies between the square footage of the existing buildings as referenced within the SCEA, the City's ZIMAS database, and the Phase I ESA. The SCEA analyzed building size based on total gross square footage of 89,510 square feet, as shown in the table below. This value was based on building permit information provided by the Applicant and reflects the total gross building area. The building area that was referenced in the Project Application is based on building sizes as identified on the ALTA Survey (i.e., 61,291 square feet). This value reflects the building footprint areas, excluding floor area on the second floor. The building area in the City's ZIMAS database references the buildable floor area as defined by the LAMC, which excludes stairways, parking areas, and hallways. The Phase I and II ESA references 68,273 square feet in describing the approximate building area on site. The references to building area in the Project Application, ZIMAS, and in the Phase I and II ESAs were not utilized to conduct the environmental analysis that was based on the existing floor area, such as utilities, air quality, GHG emissions, and traffic VMT. For these impact areas the environmental analysis consistently relied on the gross building area when calculating impacts from existing building operations because utilizing the gross building area for building operations provides a more accurate analysis for quantifying emissions associated with architectural coatings. As such, the SCEA provides a more accurate and more conservative analysis, and the noted discrepancies would not result in any new impacts that were not disclosed in the SCEA.

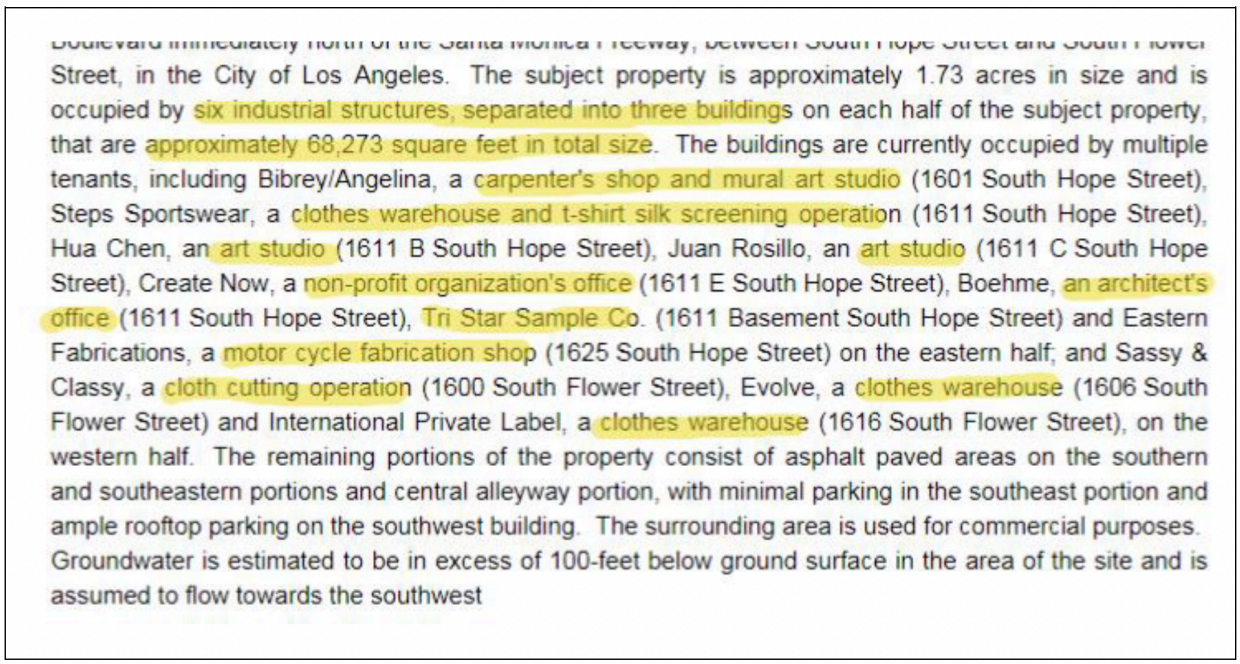
Summary of Project Site

Address	Building Permit Number	Building Size (sf)	Description	Land Use
1600-1601 S. Flower Street	1988LA85308	15,300	150' x 102' (1-story)	Retail
1616 S. Flower Street	1962LA9262	15,000	150' x 100' (1-story)	Retail
1601-1611 S. Hope Street	1988LA86548	43,710	155' x 141' (2-story)	Retail / Office [a]
1617 S. Hope Street	1946LA16453	15,500	155' x 50' (2-story)	Retail
1623 S. Hope Street	1960LA75579	-	surface parking	NA
Total		**89,510**		

Notes:
[a] The existing uses within this building are comprised of approximately 1,799 square feet of office space and 41,911 square feet of retail space.
Sources: http://zimas.lacity.org/, accessed May 2018; City of Los Angeles Department of Building and Safety, and O.K.O. Engineering, Inc., ALTA/ACSM Land Title Survey, November 1, 2012.

COMMENT 1A-13

Additionally, it appears that the Applicant purchased the Site back in December 2017,[15] the Project applications were filed in June 2018,[16] and renderings have not changed since that time.[17] Furthermore, based on Google Street images, the building seems to have experienced long vacancies since June 2018, with little signs of activity in the front or back of the properties. Hence, it would seem that the Site has potentially been relatively inactive for more than five years.



Boulevard immediately north of the Santa Monica Freeway, between South Hope Street and South Flower Street, in the City of Los Angeles. The subject property is approximately 1.73 acres in size and is occupied by six industrial structures, separated into three buildings on each half of the subject property, that are approximately 68,273 square feet in total size. The buildings are currently occupied by multiple tenants, including Bibrey/Angelina, a carpenter's shop and mural art studio (1601 South Hope Street), Steps Sportswear, a clothes warehouse and t-shirt silk screening operation (1611 South Hope Street), Hua Chen, an art studio (1611 B South Hope Street), Juan Rosillo, an art studio (1611 C South Hope Street), Create Now, a non-profit organization's office (1611 E South Hope Street), Boehme, an architect's office (1611 South Hope Street), Tri Star Sample Co. (1611 Basement South Hope Street) and Eastern Fabrications, a motor cycle fabrication shop (1625 South Hope Street) on the eastern half; and Sassy & Classy, a cloth cutting operation (1600 South Flower Street), Evolve, a clothes warehouse (1606 South Flower Street) and International Private Label, a clothes warehouse (1616 South Flower Street), on the western half. The remaining portions of the property consist of asphalt paved areas on the southern and southeastern portions and central alleyway portion, with minimal parking in the southeast portion and ample rooftop parking on the southwest building. The surrounding area is used for commercial purposes. Groundwater is estimated to be in excess of 100-feet below ground surface in the area of the site and is assumed to flow towards the southwest

In sum, the SCEA must be recirculated to include an updated analysis utilizing current and accurate information. This is critical given that the above-described data defects infect numerous other sections of the SCEA (discussed below).

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15 TFAR Application, p. 3, https://planning.lacity.org/pdiscaseinfo/document/NDgxMDk0/6d189c69-33a8-4be1-9414-6b0ce5c25431/esubmit.

16 See DCP Case Summary & Documents, https://planning.lacity.org/pdiscaseinfo/search/encoded/MjIxNzEw0.

17 UrbanizeLA (6/12/18) Two-Tower Development Proposed in South Park (showing same renderings as SCEA Fig. 2.18), https://la.urbanize.city/post/two-tower-development-proposed-south-park.

RESPONSE TO COMMENT 1A-13

The commenter states the Project Site has been vacant since 2018. However, there are existing tenants that currently occupy the Project Site. This comment is speculative as it based on point-in-time Google Street view images. Furthermore, for purposes of the Memorandum of Understanding with the Department of Transportation, a current tenant list was provided to LADOT for purposes of assessing existing traffic levels from current land uses. Thus, the commenter's assertion that the Project Site has been vacant for more than five years is incorrect. Additionally, please see Responses to Comment Letter 2 (Navel) and Comment Letter 4 (Faramarz Yadegar) for comment letters submitted by existing tenants.

COMMENT 1A-14

B. The SCEA's Air Quality & GHG Analysis Is Fundamentally Flawed

Air quality impacts and their concomitant impacts on human health must be studied in CEQA documents. (See *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184, 1220 [quoting CEQA Guidelines § 15126.2(a)].) So too, the California Supreme Court demands a robust GHG analysis to assess a project's impact on climate change. Lead agencies must provide "the contours of their logical argument," leaving no "analytical gaps" in the analysis, and supporting determinations "through substantial evidence and reasoned explanation." (*Center for Biological Diversity v. Cal. Dept. of Fish and Wildlife* ("*Newhall Ranch*") (2015) 62 Cal.4th 204, 227; see also *Cleveland National Forest Foundation v. San Diego Assn. of Governments* ("*Cleveland II*") (2017) 3 Cal.5th 497, 504, 519 [analysis must be "based to the extent possible on scientific and factual data … stay[ing] in step with evolving scientific knowledge and state regulatory schemes." (Quoting CEQA Guidelines § 15064(b)].) This analysis must include good faith efforts to disclose a project's anticipated emissions and consider consistency with the State's GHG reduction requirements, such as: reduce to 1990 GHG emission levels by 2020 (i.e., AB 32); 40 percent below 1990 levels by 2030 (i.e., SB 32); and 80 percent below 1990 levels by 2050 (i.e., Executive Order S- 3-05). (See CEQA Guidelines § 15064.4.) Here, the SCEA suffers several analytical flaws that fail to provide a good faith effort on air quality and GHG impacts.

RESPONSE TO COMMENT 1A-14

The commenter notes that human health risks from air quality impacts were not included in the SCEA. However, human health risks were analyzed in the Health Risk Assessment, dated April 2019 (Appendix O of the SCEA). The HRA determined carcinogenic risk estimates and chronic non-carcinogenic effects would not exceed the significance thresholds, and air quality impacts would be less than significant. The SCEA also properly addressed Air Quality and Greenhouse Gas Emissions impacts as further discussed below in Response to Comments 1A-15 t o1A-20.

COMMENT 1A-15

1. *Emission Model Is Infected by Outdated and Potentially Inaccurate Information*

The SCEA's air quality and GHG impacts rely on the emissions modeling via CalEEMod. (SCEA, p. 157, 165, 204, 226.) However, this model relies on the accuracy of input information, such as construction timeline and equipment, VMT estimates, amount of excavated material, and the size/use of current uses (to name a few). (APP-A2, pp. 4, 69-72, 75, 82.) However, as discussed above, much of this data here seems inaccurate and dated. Particularly problematic is the disparity of information used for the existing Site conditions, such as: (i) the SCEA claims there is 89,510-sf of *primarily retail* and only *1,799-sf office* (SCEA, Tbl. 2.1); (ii) ZIMAS reports only 60,573 square feet;[18] (iii) Applicant's application states 61,291-sf industrial uses (SPR Application,[19] p. 1); and (iv) the Phase I states 68,273 square feet of different uses (APP-D, PDF p. 7). However, the CalEEMod used 87,731-sf office with 1,779-sf regional shopping center uses. (APP-A1, p. 4 [see excerpt below].) Putting aside the questionable overall size of the existing square footage, the office space was supposed to be 1,799 sf (not 87,731 sf). Furthermore, given the type of businesses listed in the Phase I, there is no justification to consider the existing retail uses to be a regional shopping center that is owned and managed as a single large operator (e.g., Costco, Walmart, Ikea, etc.).[20]

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)
General Office Building	88.0	1000sqft	1.73	87,731
Regional Shopping Center	2.00	1000sqft	0.00	1,779

Ultimately, the flawed data inputs infect the entire emissions modeling and, therefore, any resulting air quality and GHG conclusions are similarly flawed. This must be cured in a revised analysis utilizing accurate data.

[18] https://zimas.lacity.org/?loc=MTI0LTVBMjA1ICA1Ngo1MTM0MDA4MDA2CjE2MTggUyBG TE9XRVIgU1QKCjY0Nzk0NzAuMzkxODM5NzAyLDE4MzQ3MjkuMjc1MTEyOTg1OSw2NDgyNDI2L jY0MTgzOTcwMSwxODM2Mjc1LjEwODQ0NjMxOTEKMTI0LTVBMjA1ICA1Ng%3D%3D.

[19] https://planning.lacity.org/pdiscaseinfo/document/NDgxMTI0/6d189c69-33a8-4be1-9414-6b0ce5c25431/esubmit.

[20] See CalEEMod User Guide (Apr. 2022), p. 28, https://www.caleemod.com/documents/user-guide/01_User%20Guide.pdf.

RESPONSE TO COMMENT 1A-15

The commenter states that the existing land use square feet is a reason for flawed Air Quality modeling and Greenhouse Gas analysis. The commenter points out the inaccurate land use building area utilized in CalEEMod. The building areas for the office and retail spaces were inadvertently switched when calculating existing Air Quality and Greenhouse Gas emissions. CalEEMod worksheets were rerun with the correct land uses and building area to fix this error. (The revised CalEEMod worksheets for existing conditions are provided in Appendix A to the SCEA Erratum.) The revised changes are discussed below in Response to Comments 1A-15 to 1A-21 with respect to Air Quality emissions, Greenhouse Gas emissions, and Energy demands.

COMMENT 1A-16

2. Sustainable Features Are Overblown

Here, the SCEA suggests the Project is sustainable primarily based on the Project's compliance with existing regulations (e.g., South Coast Air Quality Management District, LA Building Codes, CalGreen, Title 24, etc.) However, the Project's purported sustainability features are overblown, considering the following measures are not incorporated into this Project:

- No solar panels or renewable energy generation is being provided onsite;
- The Project is not seeking any type of LEED certification;
- The Project is not seeking Tier 1 or Tier 2 status under CalGreen Codes;
- The SCEA provides scant information about or commits to any concrete details about the purported TDM promotions or rideshare program (SCEA, p. 393);
- Provides 228 residential parking spaces (SCEA, pp. 42, 299), which is overparked, given AB 2097 removes parking minimum for projects within one-half mile of public transit;[21]
- Has no commitment to specific Energy Star (or equivalent) appliances for the Project's commercial/hotel operations,[22] which has significant electricity usage stemming from commercial refrigerators, cooling and heating the building;[23]

- Considers no hotel-specific recycling program that addresses the acute issues facing hotels, which generate higher than average waste per employee than other business, with 65 percent coming comprised of food waste, mixed paper, and mixed plastics;[24]

- Does not address any Project-specifics as it relates to the State's organic waste collection regulations that cover both multi-family and commercial developments (i.e., SB 1383),[25] the City's comprehensive Plastic Reduction Program,[26] or the City's Expanded Polystyrene (Styrofoam) Ban Ordinance;[27] and

- Removes seven existing street trees (SCEA, p. 160).

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21 https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220AB2097.

22 See e.g., Energy Star Commercial Refrigerators & Freezers, https://www.energystar.gov/products/commercial_refrigerators_freezers; see also California Air Pollution Control Officers Association ("CAPCOA") (Aug. 2010) Quantifying GHG Mitigation Measures, pp. 351, D-2 (listing ENERGY STAR commercial dishwashers and commercial refrigerators as mitigation strategy), https://planning.lacity.org/ eir/CrossroadsHwd/deir/files/references/C03.pdf; Hollywood Center Project (Apr. 2020) DEIR, p. ES-63 (committing to ENERGY STAR Certified Commercial Clothes Washers as project design feature), https://planning.lacity.org/eir/HollywoodCenter/deir/Draft%20EIR%20Sections/ES.%20Executive%20Summary.pdf.

23 CAPCOA (Dec. 2021) Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity, PDF pp. 673, 721 (EDFZ zone 17 [LADOT inland]), https://www.caleemod.com/documents/handbook/full_handbook.pdf.

24 Ibid., PDF pp. 734-735.

25 CalRecycle, FAQs about Implementing SB1383, https://calrecycle.ca.gov/organics/slcp/faq/.

26 See e.g., LASAN, https://www.lacitysan.org/san/faces/home/portal/s-lsh-es/s-lsh-es-ceqap/s-lsh-es-ceqap-cprp?_afrLoop=17412585950244979&_afrWindowMode=0&_afrWindowId=null&_adf.ctrl-state=bxg5fpc84_1#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D17412585950244979%26_afrWi ndowMode%3D0%26_adf.ctrl-state%3Dbxg5fpc84_5;

27 Council File No. 21-0064, Ord Nos. 187716-718, https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=21-0064.

RESPONSE TO COMMENT 1A-16

The commenter states the Project failed to include the sustainability measures listed above. However, all of the measures cited above are either already incorporated into the Project, are required by code, or are not applicable to the Project. The Project is required to comply with regulated sustainability features, such as Title 24 Standards, including the CALGreen Code, and the Los Angeles Green Building Code. As noted on page 246 of the SCEA, on August 11, 2021, the CEC adopted the 2022 Title 24 Standards, which were approved by the California Building Standards Commission for inclusion into the California Building Standards Code in December 2021. The 2022 Title 24 Standards encourage efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, strengthens ventilation standards, and more. Projects whose permit applications are applied for

on or after January 1, 2023, must comply with the 2022 standards. Thus, as required by the Los Angeles Green Building Code, the Project would incorporate solar zones and infrastructure capable of supporting future renewable energy generation on-site, would provide Energy Star rated appliances, and would incorporate on-site trash collection and recycling programs pursuant to the Los Angeles Green Building Code. The Los Angeles Green Building Code exceeds the minimum LEED certification levels and goes above and beyond Tier 1 and 2 levels of the CALGreen Code. Further, the removal of seven street trees would be offset by the planting of replacement trees in accordance with the City's Bureau of Street Services Urban Forestry Division's recommended practice at a 2 to 1 ratio in addition to the 63 new trees that would be planted within the Project Site as required by the LAMC. The SCEA concluded that the Project would result in less-than-significant impacts from GHG emissions and is not required to incorporate voluntary mitigation measures to reduce GHG emissions.

Furthermore, the commenter's claim that the Project is overparked because AB 2097 removes parking minimum for projects within one-half mile of public transit is not accurate. AB 2097 does not apply to hotel projects and is, therefore, not applicable to the Project. Additionally, the Project is required to provide a minimum of 288 parking spaces and is proposing 288 parking spaces. As noted in SCEA Table 2.4 Summary of Required and Proposed Vehicle Parking Spaces, the parking requirements for the Project reflect a number of code exceptions and reductions to further reduce the amount of parking that is required and being provided, including the Central City Parking District (CCPD) exceptions for residential uses, CCPD exceptions for the hotel use, a request for an additional 20 percent reduction in required hotel parking spaces pursuant to LAMC Section 12.24 S, and a reduction in parking for ground floor commercial uses pursuant to the parking standards for projects within the State Enterprise Zoning District.

COMMENT 1A-17

Also missing from the SCEA is any reference to SB 1383, much less any specific requirement in furtherance of the organic waste collection services necessary to help meet the State's GHG reduction goals, according to the California Air Resources Board ("CARB").[28] The SCEA fails to discuss any specific feasible measures that could be implemented on the entire Project Site, such as: setting up a food recovery program that could establish economies of scale for the entire Site; establishing a local community composting area; requiring outside composting bins or residential composting devices (commonly referred as "foodcyclers") at each residential unit;[29] establish Site-wide organics waste collection that could then be leveraged as feedstock to a future anaerobic digestion facility; or require a portion of the Site to be served by SB1383 byproducts on site (e.g., compost, biogas, etc.).[30]

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[28] See CARB (Dec. 2022) 2022 Scoping Plan, pp. 44, 79, 117, 223-224, https://ww2.arb.ca.gov/sites/default/files/2023-04/2022-sp.pdf.

[29] See e.g., https://www.nytimes.com/wirecutter/guides/how-to-start-composting/; https://www.whygoodnature.com/blog/reducing-food-waste-with-the-vitamix-

foodcycler#:~:text=Some%20people%20just%20keep%20their,how%20long%20compost%20bins%20take; https://foodcycler.com/.

[30] See e.g., https://calrecycle.ca.gov/organics/slcp/capacityplanning/recycling/; https://calrecycle.ca.gov/organics/slcp/; https://ww2.arb.ca.gov/our-work/programs/slcp/resources.

RESPONSE TO COMMENT 1A-17

SB 1383 did not go into effect until January 1, 2022, and did not exist at the time the Project Application was deemed complete (June 11, 2018). However, the Project would be required to comply with all applicable solid waste regulations, including SB 1383, to the extent that they are incorporated into the City's Building Code at the time construction drawings are submitted to LADBS for review and approval. Nevertheless, the Project's impacts to solid waste were concluded to be less than significant, and SB 1383 does not provide any requirement for additional analysis to be performed on the Project's solid waste impacts.

COMMENT 1A-18

C. *Quantitative Analysis Lacking and Improper Rejection of SCAQMD Thresholds*

The SCEA refuses to use any numeric threshold and rejects the use of South Coast Air Quality Management District ("SCAQMD") multi-tier GHG thresholds[31] because they purportedly were "not formally adopted." (SCEA, pp. 247-278, 255.) This reasoning lacks substantial evidence given the City has used SCAQMD GHG thresholds numerous times, including Tier 3 Screening threshold of 1,400 metric tons of CO2 equivalent per year ("MTCO2e/yr") for commercial projects,[32] 3,000 MTCO2e/yr for mixed-use projects or non-industrial projects,[33] 3,500 MTCO2e/yr for residential projects,[34] or 10,000 MTCO2e/yr threshold for industrial projects, [35] or other similar bright-line thresholds.[36] So too, the City has relied on the use of SCAQMD's Tier 4 performance standards of 4.8 (2020 year) and 3.0 (2035 year) MTCO2e/yr per service population (i.e., residents and employees) or similar efficiency standards.[37]

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[31] See SCAQMD (Oct. 2008) Draft Guidance Document – Interim CEQA GHG Significance Threshold, pp. 3-10 – 3-16, http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa- significance-thresholds/ghgattachmente.pdf; see also SCAQMD (12/5/08) Board Letter, p. 5, http://www. aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ ghgboardsynopsis.pdf?sfvrsn=2; SCAQMD (9/28/10) Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group # 15, http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse- gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-minutes.pdf.

[32] See e.g., DCP Case No. ENV-2017-3855 (Oct. 2018) MND, PDF pp. 49-50, https://planning.lacity.org/odocument/423baae0-300e-476d-add1-70364bb43d09/ENV-2017-3855.pdf.

[33] See e.g., DCP Case No. ENV-2017-4170 (Dec. 2018) MND, PDF pp. 112-114, https://planning.lacity.org/ odocument/03048272-13c8-4ed5-9331-01c45f38396f/ENV-2017-4170.pdf; DCP Case No. ENV-2015-897 (Jan. 2016) Initial Study, PDF pp. 89-91, http://planning.lacity.org/eir/nops/333LaCienega/is.pdf; DCP Case No. ENV-2016-1604 (Apr. 2017) MND, PDF pp. 86-87, https://planning.lacity.org/staffrpt/mnd/ Pub_033017/ENV-2016-1604.pdf; DCP Case No. ENV-2017-3896 (Dec. 2018) MND, PDF pp. 41,

https://planning.lacity.org/odocument/77719943-bf70-4633-bc5d-19ad5c7f8a39/ENV-2017-3896.pdf; DCP Case No. ENV-2016-1367-EIR (1/1/17) IS, PDF pp. 87-88, https://planning.lacity.org/eir/EdinburghAve/DEIR/ Appendix%20A%20-%20NOP%20IS%20and%20Comment%20Letters.pdf; DCP Case No. ENV-2016-2384 (Jan. 2018) MND, PDF pp. 101-103, https://clkrep.lacity.org/onlinedocs/2018/18-0827_misc_1_08-28-2018.0001.pdf; Bureau of Engineering ("BOE") W.O. E1908381 (3/13/19) CE, PDF pp. 4, 18, https://clkrep. lacity.org/onlinedocs/2018/18-0392_rpt_BOE_03-13-2019.pdf; Council File ("CF") No. 18-0392 project (3/13/19) CE, PDF pp. 547, 578, https://clkrep.lacity.org/onlinedocs/2018/18-0392_rpt_BOE_03-13- 2019.pdf; DCP Case No. ENV-2014-4288 (Oct. 2015) DEIR, PDF pp. 31-32, https://planning.lacity.org/eir/ 5750HollywoodBlvd/DEIR/4.C_Greenhouse_Gas_Emissions.pdf; DCP Case No. ENV-2016-1662 (Jun. 2017) DEIR, PDF p. 50, https://planning.lacity.org/eir/ProvidenceTarzanaMedicalCtr/Deir/files/D_IVD.pdf; DCP Case No. ENV-2017-628 (2/6/19) MND, PDF pp. 72-73, https://planning.lacity.org/odocument/64056bf9-e4b7-4085-b33f-89ced0b9dac5/ENV-2017-628.pdf; DCP Case No. ENV-2019-6290 (Feb. 2021) MND, PDF pp. 114-115, https://planning.lacity.org/odocument/7cb38074-68db-4b01-b2bd-cb2034240cd5/ENV-2019-6290.pdf; DCP Case No. ENV-2020-5838 (Jul. 2021) NegDec, PDF p. 106, https://planning.lacity.org/odocument/6dd1558c-675d-46dd-85a3-cfa19e776b30/ENV-2020-5838.pdf; DCP Case No. ENV-2019-5520- MND (Jul. 2021) IS, PDF pp. 84-85, https://planning.lacity.org/odocument/37473b1c-89af-485c-a16b- 1db96fb4b9c4/ENV-2019-5520.pdf; DCP Case No. ENV-2020-6951 (Aug. 2021) MND, PDF p. 55, https://planning.lacity.org/odocument/85a03721-39db-4b70-9078-f7220c76f336/ENV-2020-6951.pdf; ENV-2017- 3972 (Sep. 2021) Subsequent MND, PDF pp. 82-85, https://planning.lacity.org/odocument/b718e33a-4781- 437f-a2a9-194d28bf36e4/ENV-2017-3972.pdf; Case No. ENV-2020-2497 (Apr. 2020) SCEA, PDF p. 72, https://planning.lacity.org/odocument/eb7f30da-32a8-4c66-810b-49d3431a1473/6._Sustainable_Communities_Environmental_Analysis.pdf; ENV-2019-2314 (Mar. 2020) SCEA, PDF pp. 35-37, https://planning.lacity.org/odocument/2b972b78-9efa-4bc9-9b38-e6adcb55efc1/VI_Sustainable_ Communities_Environmental_Analysis.pdf; Case No. ENV-2018-5594 (Sep. 2019) SCEA, PDF pp. 57-58, https://planning.lacity.org/eir/sceas/documents/thatcheryard/V.%20SCEA%20Initial%20Study%20Checkli st.pdf; Case No. ENV-2015-4131 (Sep. 2019) MND, PDF p. 63, https://planning.lacity.org/odocument/ f809dc18-39a9-4874-8f39-9b2bcd43a8db/ENV-2015-4131.pdf; Case No. ENV-2019-7321 (Oct. 2020) MND, PDF p. 51, https://planning.lacity.org/odocument/001ce94f-037b-42cb-a1c6-a79939b171a6/ENV-2019- 7321.pdf; Case No. ENV-2014-3179 (Mar. 2020) MND, PDF p. 59, https://planning.lacity.org/odocument/12c43f0f-86dc-4932-b385-4fb33e8a211d/ENV-2014-3179.pdf; Case No. ENV-2019-1065 (Aug 2019) MND, PDF pp. 33-34, https://planning.lacity.org/odocument/30b4f3bc- b498-4392-81c4-164f92c94b38/ENV-2019-1065.pdf; Case No. ENV-2019-0686 (May 2019) MND, PDF p. 41, https://planning.lacity.org/odocument/1e701bbd-6286-425e-99af-e1bea3861173/ENV-2019-686.pdf and Appendix B, PDF p. 10, https://planning.lacity.org/odocument/83cc6338-cd86-43b9-9a6f-b0d4b3178e00/ ENV-2019-686-B.pdf; Case No. ENV-2018-7122 (May 2019) MND, PDF p. 42, https://planning.lacity.org/ odocument/a0a072c7-6a41-4204-b52f-596f704d1e8c/ENV-2018-7112.pdf and Appendix B, PDF p. 21, https://planning.lacity.org/odocument/3df9f721-f978-47c2-8bca-0d721c35b3b2/ENV-2018-7112-B.pdf; Case No. ENV-2017-613 (May 2019) MND, PDF p. 42, https://planning.lacity.org/odocument/6fbd4854-fd37-4f50-bd30-c813dff9a747/ENV-2017-613.pdf and Appendix A, PDF pp. 4-5, https://planning.lacity.org/odocu ment/aba55507-7fd6-49ff-abb1-4e7045a583a2/ENV-2017-613-A.pdf; Case No. ENV-2017-713 (Aug. 2019) MND, PDF p. 74, https://planning.lacity.org/odocument/b50b48c4-d6f8-4a83-9e0d-3a488b26b524/ENV- 2017-713.pdf; Case No. ENV-2019-5436 (Oct. 2019) MND, PDF p. 50, https://planning.lacity.org/odocument/319eeb30-cc17-455f-b322-8d0eb498fc4c/ENV-2019-5436.pdf; Case No. ENV-2019-3845 (Oct. 2019) MND, PDF pp. 41-42, https://planning.lacity.org/odocument/2ad7c32a-9ae9-4ee1-ace0-2c33f991b052/ENV-2019-3845.pdf; Case No. ENV-2019-4650 (Oct. 2019) MND, PDF pp. 86-87, https://planning.lacity.org/odocume nt/70edaa4e-52c0-4bdb-9960-f798e74b9dea/ENV-2019-4650.pdf; Case No. ENV-2015-4630 (Aug. 2018) DEIR, PDF p. 25,https://planning.lacity.org/eir/1375_St_Andrews_Apts/DEIR/DEIR%20Sections/IV.F.%20Greenhouse%20Gas%20Emissions%20(1375%20St%20Andrews)%20Public%20Review.pdf; Case No. ENV-

2015-3603 (Jan. 2018) DEIR, PDF p. 53, https://planning.lacity.org/eir/6200WestSunset/Deir/files/D_IVD.pdf; Case No. ENV-2015-1853 (Jun. 2016) DEIR, PDF pp. 8, 12, https://planning.lacity.org/eir/ Clarendon/DEIR/files/DEIR/4_2%20DEIR%20GHG.pdf; DCP Case No. ENV-2014-3995 (Feb.

[34] See e.g., DCP Case No. ENV-2014-1988-EIR (10/14/16) Initial Study, PDF pp. 125-126, https://planning. lacity.org/eir/1209_6thAve/Deir/DEIR%20Appendices/Appendix%20A%20-%20NOP-IS.pdf; Case No. ENV- 2016-3175 (Jan. 2019) MND, PDF pp. 102, 106, https://planning.lacity.org/odocument/683fac98-73b6- 4486-8c04-de68be571576/ENV-2016-3175.pdf; Case No. ENV-2016-4267 (Sep. 2019) MND, PDF pp. 149-151, https://planning.lacity.org/odocument/322a1b09-58a8-481c-bcd3-9adc206aa28f/ENV-2016-4267.pdf; Case No. ENV-2015-1193 (Jun. 2016) DEIR, PDF pp. 39, 52, https://planning.lacity.org/eir/McCadden/DEIR/ files/D_IVC.pdf.

[35] See e.g., DCP Case No. ENV-2017-1015-MND (2/8/18) PDF pp. 182, 220, 222, http://planning.lacity.org/ StaffRpt/InitialRpts/CPC-2017-1014.PDF; Case No. ENV-2013-015 (Feb. 2016) Recirculated DEIR, PDF pp. 26, 34, https://planning.lacity.org/eir/Harvard_WestLake/DEIRrecirculated/Chapters/ 3.2%20Air%20Quality%20RDEIR.pdf; BOE W.O. E1904503 (1/29/15) IS/MND, PDF p. 34, http://clkrep. lacity.org/onlinedocs/2014/14-0106_misc_w_5-7-15.pdf; Los Angeles World Airport ("LAWA") project EIR- 17-002-AD (Feb. 2017) DEIR, PDF pp. 141, http://clkrep.lacity.org/onlinedocs/2017/17-0836_misc_11_07- 26-2017.pdf; LAWA project NG-10-404-AD (Feb. 2011) Final NegDec, PDF p. 87, http://clkrep.lacity.org/ onlinedocs/2011/11-1518_rpt_bac_8-30-2011.pdf; LAWA project NG-16-275-AD (Nov. 2016) IS/MND, PDF pp. 72-73, http://clkrep.lacity.org/onlinedocs/2017/17-0017_misc_5_01-13-2017.pdf; BOE W.O. No. E1401293 (2/22/18) IS, PDF p. 18, http://clkrep.lacity.org/onlinedocs/2017/17-0504_misc_2_03-27- 2018.pdf; DCP Case No. ENV-2017-1015 (11/22/17) IS, PDF pp. 81-82, 182, http://clkrep.lacity.org/ onlinedocs/2018/18-0279_misc_5_04-04-2018.pdf; BOE W.O. E170093B (10/17/11) IS, PDF p. 31, http:// clkrep.lacity.org/onlinedocs/2012/12-0114_misc.pdf; BOE W.O. 1906869 (Jul. 2009) IS, PDF p. 45, http:// clkrep.lacity.org/onlinedocs/2009/09-2458_misc_4-1-16.pdf; DCP Case No. ENV-2018-4247 (01/18/19) MND, PDF pp. 89-91, https://planning.lacity.org/staffrpt/mnd/Pub_012419/ENV-2018-4247.pdf.

[36] See e.g., BOE Bending the River Back into the City Project (Jan. 2014) IS/MND, PDF pp. 34-35 (CAPCOA's 900 MTCO2e/yr), https://clkrep.lacity.org/onlinedocs/2014/14-0254_misc_a_2-24-14.pdf.

[37] See e.g., DCP Case No. ENV-2016-1951 (Apr. 2018) DEIR, PDF pp. 40, 53-54, https://planning.lacity.org/ eir/Fig_and_8th/DEIR/files/D_IVC.pdf & GHG Appendix, PDF pp. 18-20, https://planning.lacity.org/ eir/Fig_and_8th/DEIR/files/App_C.pdf; DCP Case No. ENV-2016-3909 (Apr. 2018), DEIR, PDF pp. 38-40, 75, https://planning.lacity.org/eir/Promenade_2035/DEIR/files/D_IVD.pdf; DCP Case No. ENV-2015-244 (Oct. 2016) DEIR, PDF p. 139, https://planning.lacity.org/eir/sunwest/DEIR/DEIR%20Sections/DEIR% 20SunWest_Sections%20Compiled.pdf; DCP Case No. ENV-2016-3177 (Feb. 2020) DEIR, PDF pp. 45-46, https://planning.lacity.org/eir/Hollywood_and_Wilcox/deir/files/D.IV.E.pdf and Appendix C, PDF pp. 62-65, https://planning.lacity.org/eir/Hollywood_and_Wilcox/deir/files/Appendix_C.pdf; DCP Case No. ENV-2014- 1362 (Jul. 2016) DEIR, PDF pp. 52-53, https://planning.lacity.org/eir/ICONshermanOaks/DEIR/files/ D_IVC.pdf; DCP Case No. ENV-2016-3576 (Sep. 2017) DEIR, PDF p. 23, https://planning.lacity.org/eir/668So AlamedaStreet/Deir/4.5%20Greenhouse%20Gas%20Emissions.pdf; DCP Case No. ENV-2016-4889 (Jun. 2018) DEIR, PDF pp. 53-53, https://planning.lacity.org/eir/1001_Olympic/deir/DEIR%20Sections/IV.F% 20GHG.pdf and Appendix E, PDF pp. 220-221, https://planning.lacity.org/eir/1001_Olympic/deir/DEIR% 20Appendices/E-1%20-%20AQ%20and%20GHG%20Modeling.pdf; DCP Case No. ENV-2016-4313 (Dec. 2016) MND, PDF pp. 136-137, http://clkrep.lacity.org/onlinedocs/2008/08-0887-S1_misc_7_02-22- 2017.pdf; DCP Case No. ENV-2016-4394) MND, PDF pp. 164-165, https://planning.lacity.org/odocument/ 42685ced-64ab-4c78-9f70-f5f63f805823/ENV-2016-4394.pdf; DCP Case No. ENV-2008-1421 (Oct. 2015) Addendum to Certified EIR, PDF pp. 28-31, http://clkrep.lacity.org/onlinedocs/2016/16-0033_misc_1_01-08-2016.0001.pdf; DCP Case No. ENV-2008-1773 (Sep. 2015) DEIR, PDF pp. 23-25,

http://planning.lacity.org/eir/theReef/deir/DEIR%20Sections/IV.G.%20Greenhouse%20Gases.pdf; DCP Case No. ENV-2013-194 (Feb. 2014) DEIR, PDF pp. 17-19, https://planning.lacity.org/eir/MuseumSquare/DEIR/DEIR%20Sections/IV.E.%20Greenhouse%20Gases_Global%20Climate%20Change.pdf.

RESPONSE TO COMMENT 1A-18

The commenter states that the SCEA failed to apply a numerical threshold for GHG emissions. Section 15064.4 of the State CEQA Guidelines does not establish any threshold of significance with regard to GHG impacts. Section 15064.4 provides that a lead agency shall make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of greenhouse gas emissions resulting from a project.

As stated on page 255 of the SCEA, the City has not adopted a numeric significance threshold for the analysis of GHG impacts. In the absence of any applicable adopted numeric threshold, the significance of the Project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b)(2) by considering whether the Project complies with applicable plans, policies, regulations and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. Therefore, the SCEA relied on consistency with the 2020-2045 RTP/SCS, which is designed to achieve regional GHG reductions from the land use and transportation sectors as required by SB 375 and the State's long-term climate goals. The SCEA also considered consistency with regulations or requirements adopted by the 2022 Scoping Plan and the Los Angeles Green New Deal. The quantification of GHG emissions in the SCEA was provided for informational purposes to highlight the net benefit of code compliance measures in terms of a reduction in GHG, compared to a stand-alone development. Therefore, the SCEA accurately assessed GHG emissions pursuant to State CEQA Guidelines Section 15064.4. Moreover, the fact that the City had used a numerical threshold from time to time previously, in no way prescribes its discretion under State CEQA Guidelines Section 15064.4 as between a quantitative or qualitative assessment as either are expressly permitted.

COMMENT 1A-19

D. *Project Exceeds Both Tier 3 and Tier 4 SCAQMD Thresholds*

Here, the Project exceeds SCAQMD thresholds. As summarized in SCEA Table 4.12 (p. 257), the entire Project Site currently generates a total of 1,387 MTCO2e/yr, as compared to the 4,415 MTCO2e/yr once the proposed Project is constructed (i.e., Project emissions), which amounts to a 3,028 MTCO2e/yr net increase in emissions. These emissions exceed SCAQMD's tier 3 bright-line screening threshold of 3,000 MTCO2e/yr that the City routinely uses (discussed supra).

Furthermore, when dividing the Project's annual GHG emissions (i.e., 4,415 MTCO2e/yr) by its 755-service population ("sp") (i.e., 563 residents + 192 employees) (SCEA, pp. 326-327), the Project achieves an efficiency level of 5.84 MTCO2e/yr/sp—which exceeds SCAQMD's tier 4 efficiency standard of 3.0 MTCO2e/yr/sp for year 2035 (discussed supra). Exceeding SCAQMD

thresholds may be substantial evidence of a significant impact requiring mitigation. (See e.g., *IBC Business Owners for Sensible Development v. City of Irvine* (2023) 88 Cal.App.5th 100, 130.)

RESPONSE TO COMMENT 1A-19

This comment states that the Project exceeds the GHG emissions thresholds, as defined by the commenter, based on a draft screening threshold of 3,000 MTCO2e/yr and an emission per service population level. Contrary to the comment's implications, there is no applicable adopted or accepted numerical threshold of significance for GHG emissions, including the service population threshold referenced by the commenter. The SCAQMD thresholds of significance that the commenter is referring to were proposed for consideration but were never formally adopted by the SCAQMD. Further, the lead agency has the discretion to formulate standards of significance for use in a SCEA, which requires the agency to make a policy judgment distinguishing adverse impacts deemed significant from those deemed not significant. As stated above in Response to Comment 1A.18, at its discretion the City applies a consistency analysis with statewide, regional, and local plans adopted for the purpose of reducing and/or mitigating GHG emissions as a threshold of significance, which is the City's current methodology utilized in its CEQA documents, including Initial Studies/Mitigated Negative Declarations and Environmental Impact Reports. Using this approach, the Project's GHG emissions impact would be less than significant.

COMMENT 1A-20

E. *Failing to Apply Efficiency Threshold is Not Consistent with Evolving Standards*

Despite being proposed prior to the State's adoption of more aggressive GHG reduction goals of 40 percent 1990 levels by 2030 (i.e., SB 32 and Executive Order B-30-15), SCAQMD's screening/efficiency thresholds are akin to and most consistent with bright-line/efficiency thresholds adopted by numerous other air districts in recent years, including Sacramento Metropolitan AQMD,[38] Bay Area AQMD,[39] Placer County APCD,[40] and San Luis Obispo County APCD.[41] Similarly, the Association of Environmental Professionals ("AEP") has proposed a 2030 land-use efficiency threshold of 2.6 MTCO2e/yr/sp based on SB 32 mid-term GHG reduction goals for 2030.[42] By failing to apply a performance threshold to the Project, the SCEA fails to stay in step with evolving scientific knowledge and regulatory schemes governing GHG, as required under *Cleveland II*.

In sum, the SCEA must be recirculated to include an updated GHG analysis addressing the above issues. Furthermore, to the extent the Project is inconsistent with the relevant GHG performance thresholds, the DSEIR should consider additional mitigation measures and alternatives, including but not limited to those discussed below (infra Section H).

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[38] SMAQMD (May 2018) Guide to Air Quality Assessment in Sacramento County, pp. 6:1-3, 6:10-12 ("(GHG) emissions adversely affect the environment through contributing, on a cumulative basis, to global climate change … the District recommends that lead agencies address the impacts of climate

change on a proposed project and its ability to adapt to these changes in CEQA documents … [thus urging] evaluating whether the GHG emissions associated with a proposed project will be responsible for making a cumulatively considerable contribution to global climate change."[emphasis original]), http://www.airquality.org/LandUse Transportation/Documents/Ch6GHGFinal5-2018.pdf; see also SMAQMD Thresholds of Significance Table, http://www.airquality.org/LandUseTransportation/Documents/CH2ThresholdsTable5-2015.pdf.

[39] BAAQMD (May 2017) CEQA Air Quality Guidelines, p. 2:1-4 ("No single project could generate enough GHG emissions to noticeably change the global average temperature [but rather] [t]he combination of GHG emissions from past, present, and future projects contribute substantially to the phenomenon of global climate change and its associated environmental impacts."), http://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en.

[40] PCAPCD (Oct. 2016) CEQA thresholds of Significance Justification Report, pp. E-2, 2, 17-22 ("CEQA requires that the lead agency review not only a project's direct effects on the environment, but also the cumulative impacts of a project and other projects causing related impacts. When the incremental effect of a project is cumulatively considerable, the lead agency must discuss the cumulative impacts in an EIR. [citing CEQA Guidelines § 15064]"), https://www.placer.ca.gov/DocumentCenter/View/2061/Threshold-Justification- Report-PDF; see also PCAPCD (11/21/17) CEQA Thresholds and Review Principles, http://www.placerair.org/landuseandceqa/ceqathresholdsandreviewprinciples.

[41] SLOAPCD (Mar. 28, 2012) GHG Threshold and Supporting Evidence, pp. 5, 25-30, 42 ("No single land use project could generate enough GHG emissions to noticeably change the global average temperature. Cumulative GHG emissions, however, contribute to global climate change and its significant adverse environmental impacts. Thus, the primary goal in adopting GHG significance thresholds, analytical methodologies, and mitigation measures is to ensure new land use development provides its fair share of the GHG reductions needed to address cumulative environmental impacts from those emissions.), https://storage.googleapis.com/slocleanair-org/images/cms/upload/files/Greenhouse%20Gas%20Thresholds%20and%20Supporting%20Evidence%204-2-2012.pdf.

[42] AEP (Oct. 2016) Beyond Newhall and 2020, pp. 25, 34, 40 (also identifying other air districts that have adopt/proposed similar screening/efficiency thresholds, https://califaep.org/docs/AEP-2016_Final_White_Paper.pdf.

RESPONSE TO COMMENT 1A-20

The commenter states the Project's GHG emissions would result in significant GHG impacts when applying AEP's service population threshold. As stated above, lead agencies have the discretion to use a model or methodology to analyze GHG emissions that is appropriate for the project.[4] Moreover, pursuant to Section 15204 of the State CEQA Guidelines, "CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made." As such, the

[4] *State of California, Office of Planning and Research, Discussion Draft, CEQA and Climate Change Advisory, pg. 8, December 2018.*

additional analysis of service population emissions, as suggested by the commenter, is not warranted or required.

As determined in Response to Comments 1A.14 through 1A.19 above, the commenter does not provide substantial evidence that the Project would result in a significant Air Quality or Greenhouse Gas Emissions impact.

COMMENT 1A-21

F. Energy Impacts Should Address the Failure to Incorporate Onsite Solar

CEQA requires an EIR to analyze a project's energy consumption. (Pub. Res. Code § 21100(b)(3).) In addition to examining whether there is a "wasteful, inefficient, or unnecessary use of energy, or wasteful use of energy resources," lead agencies must investigate whether any renewable energy features could be incorporated into the project. (CEQA Guidelines § 15126.2(b); *League to Save Lake Tahoe v. County of Placer* (2022) 75 Cal.App.5th 63, 167-168 [duty to investigate renewable energy option is required as part of determining whether project impacts on energy resources are significant].) A project's compliance with building codes may not be enough where they do not address many considerations under Appendix F of the CEQA Guidelines, like "whether a building should be constructed at all, how large it should be, where it should be located, whether it should incorporate renewable energy resources, or anything else external to the building's envelope … [,] energy impacts for a project intended to transform agricultural land into a regional commercial shopping center." (*California Clean Energy Committee v. City of Woodland* (2014) 225 Cal.App.4th 173, 211.)

Here, the SCEA claims the Project would have no energy impacts because it would comply with existing laws and regulations (e.g., Title 24, CalGreen Codes, LA Building Codes). (SCEA, pp. 203-204, 213). However, mere compliance with the Code and existing regulations does "not meet the requirements of appendix F of the CEQA Guidelines." (*Ukiah Citizens for Safety First v. City of Ukiah* (2016) 248 Cal.App.4th 256, 264.) Additionally, the SCEA reports the Project's anticipated electricity needs and reliance upon LADWP's power supply that is subject to the State's Renewable Portfolio Standards ("RPS"). (Id., at pp. 205, 210-11, 216.) However, the RPS requirements are a requirement of utility providers, not local land use developments. Thus, the EIR improperly credits the Project for the utilities' compliance with an unrelated state program—something warned against by CARB.[43] The SCEA avoids the relevant question of whether wasteful use of energy can be avoided or renewable energy could be incorporated into the Project. (CEQA Guidelines § 15126.2(b).) Section I of Appendix F of the CEQA Guidelines makes clear that the "goal of conserving energy implies the wise and efficient use of energy[,]" which is achieved by (emphasis added): "(1) decreasing *overall per capita energy consumption*, (2) *decreasing reliance on fossil fuels* such as coal, natural gas and oil, and (3) *increasing reliance on renewable energy sources*." Nowhere does the SCEA explain why solar panels cannot be incorporated into the Project (e.g., rooftop or facades,[44] etc.), to meet a percentage of the Project's electricity demand or to the fullest extent feasible based onsite conditions.

In sum, the SCEA must be recirculated to include an analysis of why solar or other renewable energy cannot be utilized on the site, as well as consideration of additional mitigation (discussed infra Section H).

[43] CARB (12/5/18) RE Centennial Specific Plan Final EIR, pp. 3-4, 6-7, 10-11, https://ww3.arb.ca.gov/toxics/ttdceqalist/centennialfeir.pdf; see also Draft 2022 Scoping Plan, p. 218 ("There is much local jurisdictions can do to enable statewide priorities, such as taking local action to help the state develop the housing, transport systems, and other tools we all need. Indeed, state tools—such as the Cap-and-Trade Program or zero-emission vehicle programs—do not substitute for these local efforts." Emphasis added.)

[44] See e.g., PV Magazine (10/24/22) Vertical solar on high-rise building to produce 58 MWh annually, https://pv-magazine-usa.com/2022/10/24/vertical-solar-on-high-rise-building-to-produce-58-mwh-annually/; Dezeen (8/2/22) Kennon designs office tower with "solar facade" for Melbourne, https://www.dezeen.com/2022/08/02/office-tower-solar-facade-melbourne-kennon/.

RESPONSE TO COMMENT 1A-21

The commenter states that the Project fails to incorporate solar energy resources. However, as stated on page 246 of the SCEA, the 2022 Title 24 Standards encourage efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, strengthens ventilation standards, and more. Projects whose permit applications are applied for on or after January 1, 2023, must comply with the 2022 Title 24 standards. The Project would be code-compliant and incorporate solar infrastructure as mandated by the code.

Due to the Project Site's location, other types of on-site renewable energy sources would not be feasible on-site as there are no local sources of energy from the following sources: biodiesel, biomass, hydroelectric and small hydroelectric, digester gas, fuel cells, landfill gas, methane, municipal solid waste, ocean thermal, ocean wave, and tidal current technologies, or multi-fuel facilities using renewable fuels. Furthermore, wind-powered energy is not viable on the Project Site due to the lack of sufficient wind in the Los Angeles basin. As the Project would adhere to the required building code standards, such as 2022 Title 24 standards and the Los Angeles Green Building Code, to ensure energy efficiency within the proposed structures, impacts to energy resources would be less than significant, and mitigation measures or additional design features are not required.

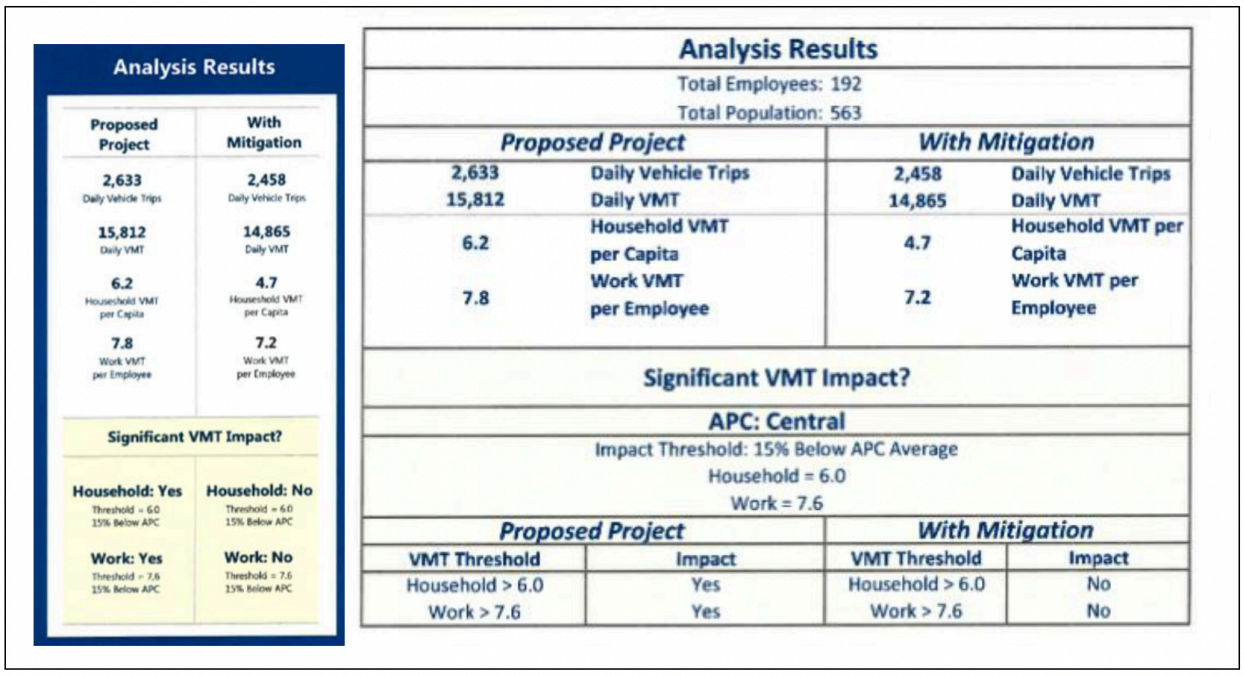
COMMENT 1A-22

G. VMT Impacts Could Be Significant And Need Mitigation Under SCEA Rules

CEQA requires analysis of VMT traffic impacts related to a project. (See *Kings County Farm Bureau v. Hanford* (1990) 221 Cal.App.3d 692, 727.) In particular, CEQA requires analysis of project-related traffic impacts in a manner that does not minimize cumulative impacts. (See e.g., *Cleveland III,* 17 Cal.App.5th at 444-445 [on remand, traffic analysis based on methodology with known data gaps that underestimated traffic impacts necessarily prejudiced informed public participation and decisionmaking]; *Kings County Farm Bureau,* supra at 718, 727 [rejecting determination that less than one percent to area emissions was less than significant because analysis improperly focused on the project-specific impacts and did not properly consider the

collective effect of the relevant projects on air quality]; *Save Cuyama Valley v. County of Santa Barbara* (2013) 213 Cal.App.4th 1059, 1072 [upheld the use of same thresholds for immediate and cumulative impacts when its application was "undoubtedly more stringent cumulative-impact threshold"]; *Al Larson Boat Shop, Inc. v. Board of Harbor Comm'rs*, (1993) 18 Cal.App.4th 729, 749 [upheld where cumulative impacts were not minimized or ignored].) The relevant inquiry is not only the relative amount of increased traffic that the Project will cause but whether any additional amount of Project traffic should be considered significant in light of the already serious problem. (See *Los Angeles Unified School District v. City of Los Angeles* (1997) 58 Cal.App.4th 1019, 1025.)

Here, the SCEA claims the Project's VMT impact will be mitigated to less than significance via three mitigation measures: (i) MM T-1 (Transportation Demand Management ("TDM"); (ii) MM T-2 (Shared Mobility); and (iii) MM T-3 (Unbundled Parking). (SCEA, pp. 131-133, 348.) Specifically, the SCEA estimated VMTs generated by the Project using LADOT's VMT Calculator tool,[45] which estimated a total of 15,812 daily VMTs generated by the proposed Project (before mitigation), resulting in a 6.2 VMT/capita (exceeding the 6.0 threshold) and 7.8 VMT/employee (exceeding 7.6 threshold). (See SCEA, pp. 358; see also APP-F1, PDF pp. 25, 28 [see excerpts on following page].) With mitigation, the Project would purportedly generate 14,865 daily VMTs, resulting in a 4.7 VMT/capita and 7.2 VMT/employee (below thresholds) and, thus, not deemed not significant. (Id.) This conclusion is incorrect for several reasons and inconsistent with the Office of Planning Research ("OPR") VMT Guidance.[46]



Analysis Results

Proposed Project	With Mitigation
2,633 Daily Vehicle Trips	2,458 Daily Vehicle Trips
15,812 Daily VMT	14,865 Daily VMT
6.2 Household VMT per Capita	4.7 Household VMT per Capita
7.8 Work VMT per Employee	7.2 Work VMT per Employee

Significant VMT Impact?

Household: Yes	Household: No
Threshold = 6.0 15% Below APC	Threshold = 6.0 15% Below APC
Work: Yes	**Work: No**
Threshold = 7.6 15% Below APC	Threshold = 7.6 15% Below APC

Analysis Results

Total Employees: 192
Total Population: 563

Proposed Project		With Mitigation	
2,633	Daily Vehicle Trips	2,458	Daily Vehicle Trips
15,812	Daily VMT	14,865	Daily VMT
6.2	Household VMT per Capita	4.7	Household VMT per Capita
7.8	Work VMT per Employee	7.2	Work VMT per Employee

Significant VMT Impact?

APC: Central

Impact Threshold: 15% Below APC Average
Household = 6.0
Work = 7.6

Proposed Project		With Mitigation	
VMT Threshold	Impact	VMT Threshold	Impact
Household > 6.0	Yes	Household > 6.0	No
Work > 7.6	Yes	Work > 7.6	No

1. *Generally, the VMT Calculator Model and Thresholds Lack Substantial Evidence for Hotel Developments*

As noted by the OPR, lead agencies have the discretion to develop and adopt their own thresholds under CEQA, provided that they are supported by *substantial evidence* and reflect a *good faith*

effort at full disclosure. (Technical Advisory, pp. 6-7, 10.) OPR also makes clear that, to the extent feasible, lead agencies should select VMT models that are *sensitive to features of the project that affect VMT*. (Id., at pp. 29-30.) OPR continues to recommend that, whenever possible, models should be *tailored with localized input* where the project is located. (Id., at p. 31.) Here, however, the VMT Calculator fails to do this for hotel developments for a variety of reasons.

First, the VMT Calculator model was not based on hotel development projects. The VMT calculator first takes the base vehicle trip/VMT calculation and adjusts it based on an MXD methodology that considers a variety of factors (e.g., number of residents and jobs, density, walking/driving connectivity, available transit, vehicle ownership, etc.). (Documentation, pp. 2-3, 11-12.) This was based on a U.S. Environmental Protection Agency ("EPA") survey of 239 mixed-use developments ("MXD") located in six major regions (id., at pp. 11-13 [fnn. 3 & 4]), conducted between 1991 – 2001 and *none from Southern California*.[47] (See excerpts above.)

	Survey Year	MXDs	Mean Acreage per MXD	Total Trip Ends	Mean Trip Ends per MXD
Atlanta	2001	24	290	6,167	257
Boston	1991	59	175	3,578	60.6
Houston	1995	34	401	1,584	46.6
Portland	1994	53	116	6,146	116
Sacramento	2000	25	179	2,487	99.4
Seattle	1999	44	207	15,915	361.7

The City further refined these models by collecting surveys from "24 residential, 10 office, and 17 mixed use sites" and validated the results via data collected on 93 developments (id., at p. 13-14, Appendix C)—*none of which were hotels*. (See figure below [no column identifying hotel uses].) This begs the question, where is the substantial evidence or localized input that the model is appropriate for Los Angeles hotels when not a single hotel in Southern California was considered in crafting the model?

Validation Sites

Address	Multi-Family Units	Affordable Units	General Retail	Bank	Health Club	High-Turnover Sit-Down Restaurant	Fast-Food Restaurant	General Office	Medical Office
725 S Bixel St, Los Angeles, CA 90017	632								

Second, the VMT Calculator thresholds systematically ignore more than 90 percent of VMTs generated by hotels. The VMT Calculator provides a trip-based assessment (Documentation, PDF p. 49), which divides the trip generation estimates into six trip purposes within two broader categories: (1) production trips, including (a) home-based work ("HBW"), (b) home-based other

("HBO"), and (c) non-home-based ("NHB"); and attractions trip, including (a) HBW, (b) HBO, and (c) NHB. (Id., at p. 15.) However, the VMT Calculator applies only two thresholds: (1) the Daily Household VMT per Capita ("VMT/capita"), which adds only the home-based production trips (i.e., HBW + HBO production trips) and divides it by the population (i.e., population); and (2) Daily Work VMT per Employee ("VMT/worker"), which takes only the HBW attraction trips and divides it by the number of workers. (Id., at p. 19.) Hence, no threshold is applied to three of the six trip purposes (i.e., NHB production, HBO and NHB attraction). This is acutely problematic for hotel developments because, as shown in the below figure, the VMT Calculator assumes 91% of all hotel trips fall within trip purposes that are not subject to any threshold (below in green)—meaning only 9 percent (i.e., workers trips) are subject to any threshold (below in yellow). (Id., at PDF p. 46 [Appendix E]; see also excerpts below [highlights added].)

Appendix E

Trip Purpose Assumptions by Land Use

Land Use	Productions			Attractions		
	Home Based Work	Home Based Other	Non-Home Based	Home Based Work	Home Based Other	Non-Home Based
###						
Warehousing/Self-Storage	0%	0%	20%	19%	41%	20%
Hotel (including restaurant, facilities, etc.)	0%	0%	9%	9%	73%	9%

This type of analysis for hotel projects is highly questionable given numerous inconsistencies with OPR recommendations, such as:

- How is the VMT Calculator sensitive to features of hotel development that affect VMT when it systematically ignores 91 percent of all VMTs generated (id., at pp. 29-30)?

- How is applying only a trip-based assessment to hotels appropriate when OPR recommends that approach only for residential and office projects (id., at pp. 5, 29)?

- Given OPR's recommendation to analyze each use separately or focus on the dominant use of a mixed-project (id., at pp. 6, 17), why is the VMT Calculator not analyzing worker and hotel patron trips separately (the former being the vastly dominant form of total VMTs)?

Third, the VMT Calculator model/threshold fails as an effective threshold under the CEQA Guidelines. In response to SB 743, OPR was tasked to establish criteria for VMT thresholds and models that are accurate, reliable, and consistent with the intent of promoting GHG reductions, multimodal transportation networks, and land use diversity. (Pub. Res. Code § 21099(b)(1).) To this end, OPR's guidance clearly embraced long-standing CEQA rules regarding thresholds, such as compliance with qualitative or performance levels that will normally determine the significance of impacts, supported by substantial evidence, ensuring decision makers intelligently take account

of environmental consequences of a proposed project, and that cumulative impacts are adequately considered. (Technical Advisory, pp. 6 – 7 [citing CEQA Guidelines §§ 15064.7(a) & (c), 15064(h)(1)), § 15151].) Here, as it relates to hotel developments, there is serious doubt about the efficacy of the City's VMT threshold model and thresholds that ignore over 90 percent of all VMTs generated by hotels, which begs many questions:

- How can VMT effects be considered normally insignificant when only a small, minority portion of the effects are considered (CEQA Guidelines § 15064.7(a))?

- What substantial evidence supports a model entirely based on non-hotel projects or the use of a threshold intended for non-hotel projects (id., at subd. I)?

- How can VMT impacts be reduced, including cumulative impacts, when the threshold ignores the majority of VMTs generated (id. At subd. (d); see also § 15064(h)(1))?

- How can decision-makers intelligently take account of the environmental consequences of VMTs when only a tiny portion of consequences are even considered (id., § 15064.3(b)(4) [incorporating § 15151])?

In sum, the VMT Calculator model and thresholds are inadequate as they relate to hotel developments. At most, the VMT/worker threshold is potentially appropriate for only 9 percent of a hotel's VMTs, which is not substantial evidence to determine automatically that the other 91% of VMTs are not significant. (See CEQA Guidelines 15064(b)(2) [mere compliance with a threshold does not relieve the agency's need to "consider substantial evidence indicating that the project's environmental effects may still be significant]; see also *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th 1099, 1108 ["thresholds cannot be used to determine automatically whether a given effect will or will not be significant."].)

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[45] LADOT Website (accessed 2023) Webpage: Development Review / Transportation Assessment / VMT Calculator (providing hyperlinks to various documents, including: VMT Calculator "User Guide" version 1.3 [May 2020]; VMT Calculator "Documentation" version 1.3 [May 2020]; LA VMT Calculator Attachment G "TDM Strategies" Appendix [Nov. 2019]; Fehr & Peers "TDF Model Report" [Feb. 2018]), https://ladot.lacity.org/businesses/development-review; see also LADOT Website (accessed 2023) Webpage: Documents / Transportation Assessment, https://ladot.lacity.org/documents/transportation-assessment

[46] OPR (Dec. 2018) "Technical Advisory," pp. 7, https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf.

[47] Journal of Urban Planning (Sep. 2011) Traffic Generated by MXD—a Six Region Study, p. 7 (Atlanta, Boston, Houston, Portland, Sacramento, Seattle), https://www.researchgate.net/profile/Ming-Zhang-24/publication/267810030_Traffic_Generated_by_Mixed-Use_Developments_-_A_Six-_Region_Study_Using_Consistent_Built_Environmental_Measures/links/56535f6008aeafc2aabb2709/Traffic-Generated-by-Mixed-Use-Develop ments-A-Six-Region-Study-Using-Consistent-Built-Environmental-Measures.pdf?origin=publication_detail.

RESPONSE TO COMMENT 1A-22

The commenter challenges the methodologies of calculating hotel VMT in the LADOT VMT Calculator, on which the Project's VMT analysis was based.

As acknowledged by the commenter, lead agencies have the discretion to develop and adopt their own thresholds under CEQA, provided that they are supported by substantial evidence and reflect a good faith effort at full disclosure. (Technical Advisory, pp. 6-7, 10.) The City's VMT thresholds and methodology are described in detail in the TAG (amended July 2020). In August 2019, LADOT published an update to the TAG to conform to the requirements of Senate Bill 743; incorporate updates to the CEQA guidelines proposed by OPR and further guidance provided in OPR's corresponding Technical Advisory 2; and to be consistent with and implement the City's CEQA Thresholds Guide update. As part of the preparation of this version of the City's TAG, the City updated its Travel Demand Forecasting (TDF) Model and transportation impact thresholds to be consistent with the VMT impact methodology. This updated version of the City's TAG, further refines and clarifies analysis methodologies that were introduced in the August 2019 update. (See Response to Comment 1A-8, above). As acknowledged by the commenter, the trip purpose assumptions for hotel land uses are identified in Appendix E of the TAG. These assumptions are based on several sources including the City of Los Angeles travel demand forecasting (TDF) Model Report, Fehr & Peers (2018); the Transportation Research Board (TRB), National Cooperative Highway Research Program (NCHRP) Report 365, Travel Estimation Techniques for Urban Planning (1998); the TRB NCHRP Report 716, Travel Demand Forecasting: Parameters and Techniques (2012). The methodology substantiating these assumptions is further explained on page 12 of the City of Los Angeles VMT Calculator Documentation (2020). Accordingly, the TAG is supported by substantial evidence and reflects a good faith effort at full disclosure.

Furthermore, as noted in the updated guidance provided in the TAG (2022 Update), VMT impacts of hotel and motel uses should evaluate the VMT impacts of both employee trips and visitor/guest trips, and apply a separate impact threshold to each trip type. With respect to evaluating potential VMT impacts of visitor/guest trips, the TAG suggests that:

> "…the analysis should screen out visitor/guest trips from a quantitative analysis where those hotels/motels would be considered to meet a localized demand for visitor/guest travel. Hotel and motel uses could be shown to not contribute to significant visitor/guest trips if they are proposed in locations that are closer to common or desired destinations for guests and visitors than other existing hotel and motel uses, and therefore result in shorter overall visitor trips that are expected without the project. The conclusion that hotel and motel uses would not result in a significant VMT impact from visitor/guest trips would be more substantiated where the hotel/motel project includes TDM measures that actively promote transit and bike share services to the hotel/motel patrons."

Consistent with this guidance, the VMT impacts for employee trips were factored into the VMT analysis in the SCEA. As noted in Comment 1A-22, nine percent of the hotel trips are attributable to Home Based Work Attraction trips, and were thus appropriately accounted for in the SCEA's VMT analysis.

With regard to the hotel visitor trips, the guidance suggests a qualitative approach in cases where the hotel would be considered to meet a localized demand for visitors. Consistent with this guidance, the hotel component of the Project would not contribute significant visitor/guest trips because of its location within a high destination travel area (high destination travel areas include areas that attract visitors from outside the region or state such as city centers, convention centers, and arenas), the Project Site's proximity to public transit, and the incorporation of TDM strategies as noted in MM-TR-1 and MM-TR-2. As noted in the SCEA, the Project is located within a High Quality Transit Area (HQTA) as defined by SCAG and a Transit Priority Area as defined by SB 743, which supports transit opportunities and promotes a walkable environment. The Project Site is served by two nearby Metro Stations within a half-mile. The Pico Station which serves the Metro A Line and Metro E Line, is located approximately 0.3 mile north of the Project Site; and the Grand/LATTC Station which serves the Metro Blue Line is located approximately 0.3 mile southeast of the Project Site. Furthermore, the Project Site is located within one-quarter mile of the Los Angeles Convension Center and 0.5 mile from the Crypto Area and LA Entertainment District, which are considered high destination areas. The Project's mitigation measures also incorporate project-specific TDM strategies which include providing marketing and promotional materials for specific transit options and on-demand access to shared mobility options with five car share spaces, ten bike share spaces, and a rideshare program. (See MM-TR-1 and MM-TR-2 in the SCEA MMP). As such, the Project's hotel component would not contribute to significant visitor/guest trips.

COMMENT 1A-23

2. Here, The VMT Calculator Ignorers [sic] *VMTs Generated by Hotel Patrons*

As discussed above, the VMT Calculator ignores the vast majority of VMTs generated by hotels (generally), which leads to a massive underassessment of this Project's VMT impact. As shown in the below excerpts (APP-F1, PDF p. 35 [highlights added]), the 4.7 VMT/capita is the result of taking the total 2,641 home-based production VMTs (i.e., 1,062 HBW trips + 1579 HBO trips) and dividing it by 563 total residents (see below figure in yellow); and the 7.2 VMT/worker is the result of only 1,388 HBW attraction VMTs divided by 192 employees (see below figure in red). Hence, the VMT Calculator applied a threshold to only 4,029 VMTs (i.e., 1,062 + 1,579+1,388)—or roughly 27 percent of the total 14,865 VMTs generated by the Project.

MXD Methodology with TDM Measures

	Proposed Project			*Project with Mitigation Measures*		
	TDM Adjustment	Project Trips	Project VMT	TDM Adjustment	Mitigated Trips	Mitigated VMT
Home Based Work Production	-7.3%	209	1,398	-29.6%	158	1,062
Home Based Other Production	-7.3%	462	2,077	-29.6%	351	1,579
Non-Home Based Other Production	-7.3%	273	2,023	-7.3%	273	2,023
Home-Based Work Attraction	-7.3%	171	1,501	-14.3%	158	1,388
Home-Based Other Attraction	-7.3%	1,171	6,560	-7.3%	1,171	6,560
Non-Home Based Other Attraction	-7.3%	347	2,253	-7.3%	347	2,253

MXD VMT Methodology Per Capita & Per Employee

Total Population: 563
Total Employees: 192
APC: Central

	Proposed Project	*Project with Mitigation Measures*
Total Home Based Production VMT	3,475	2,641
Total Home Based Work Attraction VMT	1,501	1,388
Total Home Based VMT Per Capita	6.2	4.7
Total Work Based VMT Per Employee	7.8	7.2

Notwithstanding a lead agency's discretion to develop and adopt their own thresholds, here, there is no substantial evidence to support a threshold scheme that ignores the vast majority of VMTs generated by this Project—roughly 73 percent of all VMTs generated by this two-tower Project. The SCEA ignores the significance of more than 10,836 daily VMTs generated by the Project (i.e., 2,023 NHB production, 6,560 HBO and 2,253 NHB attraction trips). (See fig. above [not highlighted].) Here, just because 4,029 daily VMTs (i.e., 27% of the total) were determined insignificant does not necessarily mean the other 10,836 daily VMTs (i.e., 73% of total) are not significant in the instant case, much less the cumulative effects of all developments including a hotel component given the VMT Calculator systematically assesses only nine percent of hotel VMTs (discussed supra).

In sum, the SCEA fails to "bridge the analytic gap" showing, through substantial evidence and reasoned explanation, that the VMT Calculator adequately assessed the Project's VMTs. (*Topanga Assn. for a Scenic Community v. County of Los Angeles* (1974) 11 Cal.3d 506, 515; see also *Center for Biological Diversity v. Cal. Dept. of Fish and Wildlife* (2015) 62 Cal.4th 204, 227 [lead agencies must provide "the contours of their logical argument," leaving no "analytical gaps" in the analysis].)

RESPONSE TO COMMENT 1A-23

The commenter states the Project's estimated VMT from hotel uses is underestimated because of inaccurate modeling in LADOT's VMT Calculator. The methodology and thresholds of significance used by City's VMT Calculator is described in great detail in the TAG and is, thus, supported by substantial evidence and represents a good faith effort for full disclosure. Furthermore, in accordance with LADOT's TAG 2022 Update, VMTs for hotel guests/visitors are presumed to be less than significant if they are proposed in locations that are closer to common or desired destinations for guests and visitors than other existing hotel and motel uses, and therefore result in shorter overall visitor trips that are expected without the project. The conclusion that hotel and motel uses would not result in a significant VMT impact from visitor/guest trips can be further substantiated where the hotel/motel project includes TDM measures that actively

promote transit and bike share services to the hotel/motel patrons. As noted in Response to Comment 1A-22, the trips associated with hotel visitors would not significantly impact regional VMT due to several qualitative factors including the Project Site's location within a high desination travel area, the Project Site's proximity to public transit, and the incorporation of project-specific TDM measures (see Response to Comment 1A-22 above). The commenter's disagreement with the analytical methodology and thresholds of significance for the hotel component does not render the SCEA flawed under CEQA. Moreover, the commenter fails to provide substantial evidence that the Project would result in a significant VMT impact.

COMMENT 1A-24

3. Outdated and Unclear Site Conditions

As previously mentioned, the SCEA relies on a VMT analysis conducted back in December 2019 (SCEA, APP-F1, PDF p. 16), which was nearly four years ago (well before COVID) and based on an older VMT Calculator model (i.e., v.1.2) as compared to the current version (i.e., v.1.4 in 2023).[48] This is important given the model has changed even between v.1.2 and v.1.3. (Documentation, PDF p. 49.) Furthermore, there is conflicting information about existing site conditions, such as (i) the size of the four buildings (e.g., 89,510 or 61,291 or 60,573 square feet); (ii) uses (e.g., retail, office, industrial, various other uses); and (iii) potential long baseline vacancies.

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[48] See https://ladot.lacity.org/businesses/development-review#transportation-assessment; see also LADOT (4/17/20) Pandemic-Related Updates to LADOT's Transportation Assessment Requirements, p. 2 (noting the anticipated revised 1.3 version to be release by June 2020), https://ladot.lacity.org/sites/default/ files/documents/ladot-tag-pandemic-related-updates-april-17-2020_0.pdf.

RESPONSE TO COMMENT 1A-24

The commenter states that there is conflicting information regarding the square footage of existing land uses and implies that the VMT analysis provided in the SCEA is flawed because it is outdated. As discussed in Response to Comment 1A.12, the Project's VMT analysis was based on the existing gross square feet based on building permit information as reported by the Applicant at the time of analysis, which most accurately reflects the correct methodology. As discussed in Response to Comment 1A.8, for informational purposes, the Project's VMT assessment was analyzed using the most current version (Version 1.4) of the VMT Calculator model to assess whether the conclusions under an updated version would be greater than the findings concluded in the SCEA, as included in Appendix B to the SCEA Erratum. As discussed above in response to Comment 1A.8, the updated analysis demonstrates that the findings in the SCEA would be the same under the updated VMT Calculator. Therefore, no changes to the SCEA are warranted.

COMMENT 1A-25

4. Quantitative & Qualitative Evidence Shows Hotel VMTs Are Significant

Notwithstanding the potentially inaccurate data used in this old model, the results themselves demonstrate substantial evidence that the VMTs generated are significant.

First, total VMTs will increase at the Project Site and exceed quantitative thresholds. While OPR recommends efficiency thresholds (i.e., VMT/capita, VMT/worker) for office and residential projects, it recommends assessing the net change in total VMTs for retail projects, redevelopment projects or to assess the "customer VMT component" of the project like a government office building. (Technical Advisory, pp. 5; see also pp. 16, 17.) Here, like a retail or government building, the Project's hotel/restaurant component constitutes a substantial customer VMT component. Here, the Project would admittedly increase total daily VMTs by 248 as compared to the site conditions when modeled under the VMT Calculator (back in December 2019) and thus quantitatively illustrate a significant VMT impact under the retail threshold recommended by OPR.

RESPONSE TO COMMENT 1A-25

The commenter states the Project's VMT would exceed quantitative thresholds. As determined in the SCEA, the VMT Analysis concluded the Project would cause significant VMT impacts for both Household VMT and Work VMT prior to mitigation. Thus, the SCEA identified Mitigation Measures MM T-1, MM T-2, and MM T-3, which include trip reduction promotion and marketing, shared mobility, and unbundled parking. After mitigation, the Project's total daily VMT are expected to be less than the estimated screening level estimate of the existing uses. The existing land uses were estimated to generate 15,812 VMT on a daily basis, whereas the Project was projected to generate 14,865 VMT with the incorporation of mitigation measures. Similarly, the updated VMT Calculator demonstrates a net reduction in VMT when comparing the VMT generated by the existing uses to that generated by the Project with the incorporation of mitigation measures. Under the VMT Calculator Version 1.4, the existing land uses are estimated to generate 17,533 total daily VMT under the screening assessment, and the total daily VMT of the Project with the incorporation of mitigation measures is expected to generate 16,707 total daily VMT. Under both versions of the VMT calculator, impacts would be less than significant with the incorporation of mitigation measures. Therefore, the commenter does not raise any new information or significant impacts beyond those already addressed in the SCEA.

COMMENT 1A-26

Second, the City could run models to calculate total VMTs in the area change like other cities do. OPR recommends utilizing a qualitative analysis only when quantitative analysis is not possible. (Technical Advisory, p. 7 [fn 12].) One of the quantitative methods recommended is estimating the change in total VMT with and without the project and see if total VMTs in the relevant areas increase or decrease (id., at p. 30), such as what is done for non-screened out developments in the City of Anaheim where the city applies both an efficiency threshold and a total effect on VMT threshold.[49] The SCEA fails to explain why a similar feasible approach was not considered here.

Third, failing to provide a qualitative analysis is inconsistent with existing LADOT guidelines. The SCEA must provide at least a qualitative analysis of the hotel guest VMTs under the current LADOT guidance. (See TAG, pp. 2-7 – 2-8, 2-10 [excerpts following page].) The plain language is clear that the SCEA should do this here.

> Hotel and Motel Uses. VMT impacts of hotel and motel uses should evaluate the VMT impacts of both employee trips and visitor/guest trips, and apply a separate impact threshold to each trip type. The employee trips should be treated similar to those for office uses where the hotel/motel project would result in an impact if it generates work VMT per employee exceeding 15% below the existing average work VMT per employee for the APC in which the project is located.
>
> ###
>
> To evaluate potential VMT impacts of visitor/guest trips, the analysis should screen out visitor/guest trips from a quantitative analysis where those hotels/motels would be considered to meet a localized demand for visitor/guest travel. Hotel and motel uses could be shown to not contribute to significant visitor/guest trips if they are proposed in locations that are closer to common or desired destinations for guests and visitors than other existing hotel and motel uses, and therefore result in shorter overall visitor trips that are expected without the project. The conclusion that hotel and motel uses would not result in a significant VMT impact from visitor/guest trips would be more substantiated where the hotel/motel project includes TDM measures that actively promote transit and bike share services to the hotel/motel patrons.
>
> Where it can not be qualitatively demonstrated that hotel and motel uses would not result in lower guest/visitor trip distances as compared to "without project" conditions, the analysis should quantify the VMT of visitor/guest trips and either evaluate if the visitor/guest trips would lead to a net increase in daily VMT of those trips as compared to without the project or, if technically feasible, would generate VMT per visitor/guest that exceed 15% below the existing average citywide VMT per visitor/guest.
>
> ###
>
> Hotel and Motel Uses. VMT impacts of hotel and motel uses should evaluate the VMT impacts of both employee trips and visitor/guest trips, and apply a separate impact threshold to each trip type. The employee trips should be treated similar to those for office uses where the hotel/motel project would result in an impact if it generates work VMT per employee exceeding 15% below the existing average work VMT per employee for the APC in which the project is located.

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[49] Anaheim (Jun. 2020) TIA Guidelines for CEQA, p. 8 (after running OCTAM model under baseline conditions, baseline plus project, cumulative no project, and cumulative plus project), https://www.anaheim.net/DocumentCenter/View/32774/City-of-Anaheim-TIA-Guidelines-for-CEQA-Analysis-62020.

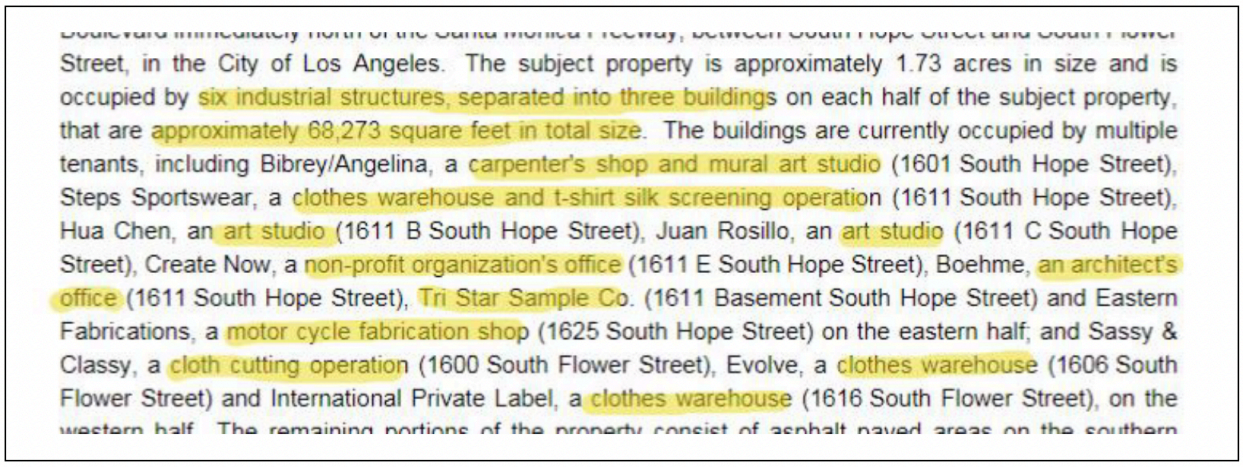
RESPONSE TO COMMENT 1A-26

The commenter states the SCEA should have included a qualitative analysis of the Project's hotel uses. However, this analysis is not required when a quantitative threshold was appropriately analyzed in the SCEA, as was done therein. As such, there is no inconsistency with LADOT Guidelines, as hotel VMT impacts are addressed with an appropriate threshold. Pursuant to Section 15204 of the State CEQA Guidelines, CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and make a good faith effort to provide full disclosure of potential impacts.

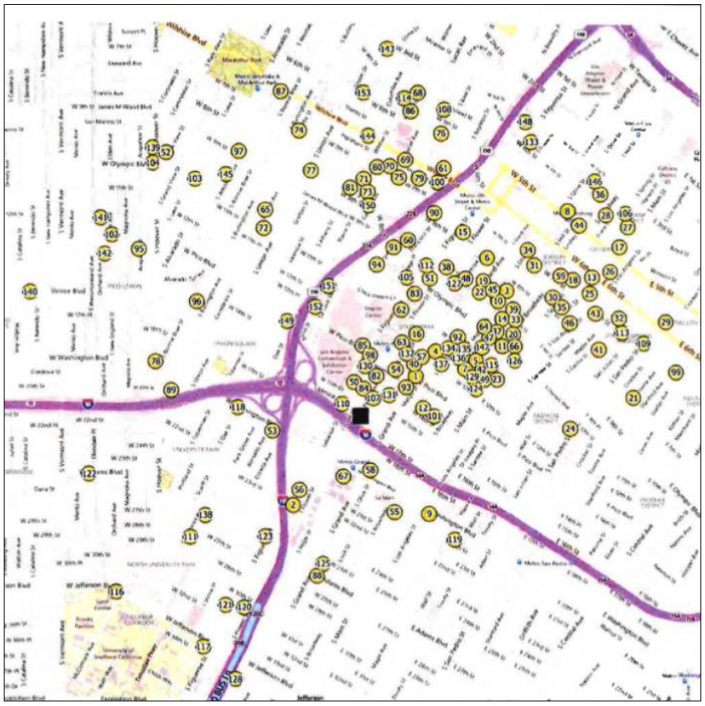
The City as the lead agency has the authority to determine the appropriate methodology for analysis, as it has done here by performing the VMT analysis described herein.

COMMENT 1A-27

Fourth, hotels are qualitatively a regional serving use, which can be presumed to be significant when hotels displace otherwise existing local-serving businesses. OPR recognizes that regional-serving retail development can have a significant VMT impact as compared to local-serving retail development. (Technical Advisory, p. 16.) So too, OPR warns cities from truncating VMT analysis because of jurisdiction boundaries. (Id., at p. 6.) Here, as a general matter, hotels primarily cater to non-locals and are nothing like a local serving retail establishment—as recognized by other nearby SoCal cities. Additionally, hotel patrons traveling from LAX and outside the region will have lengthy VMT commutes. Furthermore, the Project would remove a variety of smaller yet more diverse local serving uses as described in the SCEA's Phase I. (APP-D, p. 1 [see excerpts following page].) Just like a project that leads to an increase in locally-serving retail can be presumed to have less than significant impacts (as noted by OPR) (Technical Advisory, p. 18), here the Project would decrease locally serving establishments (presumably since the SCEA assumes these uses are still active) and could be presumed to have a significant impact.


Street, in the City of Los Angeles. The subject property is approximately 1.73 acres in size and is occupied by six industrial structures, separated into three buildings on each half of the subject property, that are approximately 68,273 square feet in total size. The buildings are currently occupied by multiple tenants, including Bibrey/Angelina, a carpenter's shop and mural art studio (1601 South Hope Street), Steps Sportswear, a clothes warehouse and t-shirt silk screening operation (1611 South Hope Street), Hua Chen, an art studio (1611 B South Hope Street), Juan Rosillo, an art studio (1611 C South Hope Street), Create Now, a non-profit organization's office (1611 E South Hope Street), Boehme, an architect's office (1611 South Hope Street), Tri Star Sample Co. (1611 Basement South Hope Street) and Eastern Fabrications, a motor cycle fabrication shop (1625 South Hope Street) on the eastern half; and Sassy & Classy, a cloth cutting operation (1600 South Flower Street), Evolve, a clothes warehouse (1606 South Flower Street) and International Private Label, a clothes warehouse (1616 South Flower Street), on the

Fifth, this part of the City is not underserved by hotels. Adding uses in underserved areas can lead to a net VMT reduction effect, such as adding a grocery store in a food desert that would divert rips [sic] from more distance stores (aptly noted by OPR). (Technical Advisory, p. 30.) Here, however, the Project's hotel component does not address unmet local demand when the SCEA shows nearly 30 other planned hotel projects (as of October 2018) near the Project Site that would add about 9,000 hotel rooms. (See SCEA, APP- F2, PDF pp. 122-133 [related projects 19, 25, 34, 42, 44, 55, 62, 79, 83, 87, 91, 97, 98, 105, 106, 110, 112, 117, 121, 126, 129, 130, 132, 137, 145, 146, 148, 149, 151]) (see excerpt right.) Additionally, according to a 2018 CLA report, the City has already reached its hotel room goal.[50]



Furthermore, the SCEA identifies another 132-room hotel project within walking distance from the Project Site. (SCEA, pp. 53-54 [Related Project 6], see figure right.) Unlike housing, which is desperately needed (particularly affordable housing), there is not an overwhelmingly unmet need for more hotel rooms.

In sum, the SCEA must be recirculated to include an updated VMT analysis based on accurate information, as well as consideration of additional mitigation (discussed infra Section H).

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50 CLA (11/21/18) Report RE: Economic Development Incentive Program, pp. 16-17.

RESPONSE TO COMMENT 1A-27

The commenter states the surrounding area is adequately served by hotel uses and that there is no need for more hotel rooms. These are speculative comments and the commenter does not provide substantial evidence of new, significant VMT impacts beyond those already addressed in the SCEA. Additionally, the commenter states that the VMT analysis is flawed because the area is oversaturated with hotel uses within the Project vicinity and the hotel use would displace locally serving land uses. This comment fails to recognize the mixed-use nature of the Project and the fact that in addition to the hotel use, the Project would incorporate 250 dwelling units, 13,120 square feet of ground floor commercial retail uses (including 3,120 square feet of restaurant space and 10,000 square feet of medical office space) which are local serving land uses. With regard to the demand for hotel uses, the downtown Los Angeles area is experiencing increased demand. According to recent reports in the Los Angeles Business Journal (DTLA Hospitality Booming)[5] and DTLA Alliance's Hospitality Report,[6] the downtown Los Angeles area has over 10,000 hotel rooms and is anticipating increased demand over the next decade for events including the 2028 Olympics, the 2026 World Cup and the 2027 Super Bowl. Thus the commenter's assertion that the area is oversaturated with hotels compared to the anticipated demand is inaccurate.

COMMENT 1A-28

E. Noise/Vibration Impact Needs Better Analysis

CEQA requires disclosure and mitigation of noise impacts. (See *Los Angeles Unified School District v. City of Los Angeles* (1997) 58 Cal.App.4th 1019.) These impacts must be explained with "plain language" and draw an explicit connection between increased exposures to their likely human-health effects (e.g., headaches, nuisance, etc.). (CEQA Guidelines § 15140; see also *San Franciscans for Reasonable Growth v. City and County of San Francisco* (1987) 193 Cal.App.3d 1544, 1548; *Bakersfield Citizens,* 124 Cal.App.4th at 1219.) Furthermore, a lead agency may not ignore cumulative noise impacts by claiming an area is already heavily impacted by noise and, therefore, project-related additions would be insignificant. (See *Los Angeles Unified,* 58 Cal.App.4th at 1025.) Here, the SCEA claims noise and vibration impacts are mitigated to less than significant via regulatory compliance and five mitigation measures MM-N-1 through MM-N-6. (SCEA, pp. 124– 128.) This conclusion is questionable given the following issues:

RESPONSE TO COMMENT 1A-28

The commenter states the noise analysis in the SCEA is questionable, which is discussed in more detail below. However, the commenter does not provide substantial evidence that the Project would result in a new or increased significant noise impact beyond those already identified in the SCEA.

[5] Los Angeles Business Journal, Report: DTLA Hospitality Booming, By James Brock May 13, 2024. https://labusinessjournal.com/real-estate/report-dtla-hospitality-booming/, accessed May 2025.

[6] DTLA Hospitality Report, April 2024, https://downtownla.com/business/reports-and-research/dtla-hospitality-report, accessed May 2025.

COMMENT 1A.29

1. *Ambient Noise Levels May Be Inaccurate and Not Represent Realistic Existing Conditions*

First, noise measurements are outdated. As previously mentioned, the SCEA's reported ambient noise levels were prepared in late 2018 and early 2019 (SCEA, p. 308), which is nearly four years ago and before COVID. To put it in context, LADOT requires traffic counts to be no "more than two years old" before requiring developers to collect new counts.[51]

Second, noise measurements may be inflated from residual peak traffic. Here, daytime ambient levels were established via 15-minute measurements taken during 10:30 – 11:30 am (SCEA, p. 308), which is just after am peak hour traffic periods (i.e., 7:00 – 10:00 am).[52] This may have inflated baseline ambient levels due to residual traffic congestion following the peak period.

Third, measurements do not reflect upper-story noise levels. Ambient levels were taken at the ground floor street level. (SCEA, APP-E, PDF pp. 4, 6, 8, 10, 12, 14.) This may not reflect ambient noise conditions at upper-floor residential sites adjacent to the Project site (SCEA, Fig. 4.2 & Tbl. 4.14), such as the following sensitive receptor sites within 80 feet of the Project Site: (i) site 1, the New Carver Apartments operated by Skid Row Housing Trust ("SRHT") for 100 percent special needs homeless population with windows on floors 2 through 5 (13 – 63 feet above grade);[53] (ii) sensitive receptor site 2, the Hope Street Margolis Family Center with windows on floors 2 through 4 (20 - 50 feet above grade);[54] and (iii) sensitive receptor site 4, the 3-story apartment structure subject to rent-stabilized ordinance ("RSO") with windows on all three floors (8-30 feet above grade).[55]

Fourth, CNEL ambient levels should be established via 24-hour measurements. The SCEA does not provide a CNEL ambient noise level and provides only early nighttime ambient levels from 9:30-10:30 pm. However, where a project will include noise-generating activities at late-night hours (e.g., hotels, alcohol-serving establishments, bars, etc.), establishing accurate evening and nighttime noise levels is critical for the City to protect nearby residents from sleep-disturbing impacts. We question why 24-hour measures were not taken to establish 24-hour CNEL levels or 15-minute measures later in the evening, closer to midnight, when levels tend to be lower, like other City CEQA reviews.[56]

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51 See LADOT (Aug. 2022) Transportation Assessment Guidelines ("TAG"), p. 3-7, https://ladot.lacity.org/ sites/default/files/documents/2020-transportation-assessment-guidelines_final_2020.07.27_0.pdf.

52 Ibid., at p. 3-7.

53 See SRHT, New Carver Apartments, https://skidrow.org/buildings/new-carver-apartments/; DCP Case No. ZA-2006-10146-ZV-ZAA, Elevation Plan (scanned 2/14/08), https://planning.lacity.org/pdiscaseinfo/docum ent/ODg4NDc0/0adcf4f1-673b-40c4-8f45-98866eb1693a/pdd; LA Housing Department, New Carver Apartments, https://lahousing.lacity.org/AAHR/ComCon/Tab/RenderTab?tabname=Property

54 SCEA, Fig. 2.5 (View 9); https://www.hopestreetfamilycenter.org/; GoogleEarth (approximate height estimations).

[55] SCEA Fig. 2.5 (View 9 in the background); GoogleEarth (approximate height estimations); see also ZIMAS, https://zimas.lacity.org/?loc=MTI0LTVBMjA1ICA4Mgo1MTM0MDE1MDEzCjE1MjYgUyBIT1BFIFNUCgo2NDc5ODE1LjI4MjQ2NDcwMSwxODM1MjY3LjA2Njc3OTY1MjQsNjQ4MTY4NC4wMzI0NjQ3MDEsMTgzNjQ3MS4y MzM0NDYzMTkKMTI0LTVBMjA1ICA4Mg%3D%3D.

[56] See e.g., Paseo Marina Project (DCP Case No. ENV-2016-3343) Draft EIR Noise Section, PDF p. 12 (collecting 24-hour measurement for some receptors and day and nighttime measurements for another), https://planning.lacity.org/eir/PaseoMarina/Deir/files/D_IVH.pdf; Venice Place Project (DCP Case No. ENV-2016- 4321) Draft EIR Noise Section, PDF p. 11 (taking both day and night measurements), https://planning.lacity.org/eir/VenicePlace/Deir/DEIR%20Sections/4.H.%20Noise.pdf; 713 E. 5th St. Project (DCP Case No. ENV- 2017-421) Draft EIR Noise Section, PDF p. 12 (15-minute and 24-hour measurements taken), https://planning.lacity.org/eir/713_East_5th/Deir/files/D_IVE.pdf; Landmark Apartments Project (DCP Case No. ENV-2013-3747) Draft EIR Noise Section, PDF p. 11 (day and nighttime levels established), https://planning.lacity.org/eir/LandmarkApartments/DEIR/files/D_IVH.pdf; Hollywood & Gower Project (DCP Case No. ENV-2016-2849) Draft EIR Noise Section, PDF p. 15 (15-minute day and night measurements taken), https://planning.lacity.org/eir/Hollywood_and_Gower_2018/Deir/DEIR%20Sections/IV.I%20Noise%20(Hol lywood%20&%20Gower).pdf; Fig & 8th Project (DCP Case No. ENV-2016-1951) Draft EIR Noise Section, PDF pp. 13-14 (day and night time measurements taken), https://planning.lacity.org/eir/Fig_and_8th/ Deir/files/D_IVE.pdf; Mt. St. Mary's Univ. Chalon Campus Project (DCP Case No. ENV-2016-2319) Draft EIR Appendix G Technical Report, PDF p. 25 (15-min. and 24-hr. measurements taken), https://planning.lacity.org/eir/MSMU_Chalon_Campus/Deir/Appendix%20G%20Noise%20and%20Vibration%20Report.pdf; 6421 W. Selma (DCP Case No. ENV-2016-2602) MND, PDF pp. 182-184 (calculating noise levels at varying hours during the early morning, daytime, early evening, and late evening), https://planning.lacity.org/staffrpt/ mnd/Pub_010418/ENV-2016-2602.pdf.

RESPONSE TO COMMENT 1A-29

The commenter states the ambient noise measurements obtained for the Project Site are outdated, inflated, do not reflect the above-grade levels, and should represent 24-hour Community Noise Equivalent Level (CNEL) noise levels. The commenter's claim that the SCEA failed to provide accurate existing ambient noise levels is incorrect.

Based on the LAMC Section 111.01, "ambient noise" is defined as: *"composite of noise from all sources near and far in a given environment, exclusive of occasional and transient intrusive noise sources and of the particular noise source or sources to be measured. Ambient noise shall be averaged over a period* ***of at least 15 minutes*** *at a location and time of day comparable to that during which the measurement is taken of the particular noise source being measured." [emphasis added in* ***bold****]*

Existing ambient daytime noise levels are provided in Appendix E of the SCEA. As detailed therein and as shown in Figure 4.2, Noise Monitoring and Sensitive Receptor Location Map, of the SCEA, six 15-minute noise measurements were taken at three locations adjacent to the surrounding multi-family residential sensitive receptors, during the daytime and nighttime on weekdays.

As previously discussed in Response to Comment 1A.9, although the ambient noise data were obtained in September 2018 (daytime) and February 2019 (nighttime), there is no requirement in the LAMC that establishes a specific date that ambient noise levels must be obtained for a development project. The ambient noise measurements represent the existing baseline conditions for the Project Site, to which the Project's noise impacts were compared, and there have been no recent changes to development in the Project vicinity since these measurements were taken.

The commenter also speculates the time the ambient noise measurements were taken may have resulted in inflated levels due to residual traffic congestion following the peak period. The noise measurements were taken during the off-peak daytime hours on a weekday, when all construction activities and a majority of operation would occur on-site. Therefore, the daytime measurements were conservative since noise is typically lower during off-peak hours. The commenter does not provide substantial evidence to the contrary.

The commenter goes on to state that measurements do not reflect upper-story noise levels. However, pursuant to LAMC Section 111.02, Sound Level Measurement Procedure and Criteria, the microphone shall be located four to five feet above the ground and ten feet or more from the nearest reflective surface. It is infeasible to asses the ambient noise levels at the upper floors of private residences due to the fact that they are not publicly accessible. Furthermore, because the dominant noise source within the area is from vehicle noise, recording the ambient noise at ground level provides a more accurate representation of noise levels in the area as the ambient noise level at higher levels above grade would be attenuated by an increase in distance and building surface absorbtion. Therefore, sound level measurements are not required to represent above-grade ambient noise levels.

Finally, the sound level measurements are not to represent 24-hour CNEL ambient noise levels; rather, the LAMC requires a 15-minute interval. The SCEA complied with the ambient noise levels pursuant to LAMC Sections 111.01 and 111.02. Since no construction activities would occur past 7:00 p.m. (when a 5-dBA CNEL penalty is applied) or after 10:00 p.m. (when a 10-dBA CNEL penalty is applied), there is no significance to evaluate construction noise impacts based on CNEL. The Project's construction activities would generate no noise levels between 9:00 p.m. and 7:00 a.m. Monday through Friday, and between 6:00 p.m. and 8:00 a.m. on Saturday as these hours are outside the permissible construction hours as defined by the LAMC.

COMMENT 1A-30

2. *Construction impacts could be underestimated and require more mitigation.*

First, equipment usage factors are used inconsistently. The SCEA estimates the highest estimated exterior construction noise by looking at five equipment pieces (e.g., two backhoes, one tractor, one dozer, and one concrete saw) (SCEA, pp. 311-12; APP-E, PDF pp. 17 – 20), which reflects the equipment listed in the CalEEMod worksheets for the Project's demolition phase. (APP- A2, p. 71.) However, the load factor for the concrete saw is roughly 75% as

compared to the noise worksheet assumption of only 20 percent. (*Compare* APP-A2, p. 71 *with* APP-E, PDF pp. 17). This same type of inconsistency is also present during the building phase analysis for the anticipated crane, generator, and three welders (compare APP-A2, p. 71 with APP-A2, PDF p. 25); repeated during the finishing architectural coating phase for the two aerial lifts, missing forklift, and all ten air compressors (compare APP-A2, pp. 71-72 with APP-A2, PDF p. 31); and committed again during the paving phase for the Cement and Mortar Mixer, Paving Equipment, and rollers (compare APP- A2, pp. 72 with APP-A2, PDF p. 41).

RESPONSE TO COMMENT 1A-30

The commenter states that the equipment usage factors are inconsistent. However, there is a difference between "load factors" contained within the CalEEMod worksheets and "acoustical use factors" utilized in the noise calculations worksheets. Load factors in the CalEEMod worksheets detail the fraction of available power. Load factor is determined from actual and maximum fuel consumption rates for various pieces of equipment.[7] The load factors in CalEEMod are automatically populated with the default average values from CARB's OFFROAD2007 and OFFROAD2011.[8]

The acoustical usage factors estimate the fraction of time each piece of construction equipment is operating at full power (i.e., its loudest condition) during a construction operation. These usage factors can be found in Table 1 of the Federal Highway Administrations' Roadway Construction Noise Model User's Guide,[9] which also provided the calculations and methodologies applied to the construction noise worksheets in the SCEA. Therefore, load factor percentage and acoustical usage factors are two separate values.

COMMENT 1A-31

Second, a realistic construction equipment list is needed. The SCEA does not provide an equipment list for the various construction phases, which may include much louder equipment, such as trucks, pneumatic impact equipment, jackhammers, scrapers, and rock drilling that

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7 EPA, Median Life, Annual Activity, and Load Factor Values for Nonroad Engine Emissions Modeling, Page 8, website: https://nepis.epa.gov/Exe/ZyNET.exe/P10081RV.txt?ZyActionD=ZyDocument&Client=EPA&Index=2006%20Thru%202010&Docs=&Query=%28load%20factor%29%20OR%20FNAME%3D%22P10081RV.txt%22%20AND%20FNAME%3D%22P10081RV.txt%22&Time=&EndTime=&SearchMethod=1&TocRestrict=n&Toc=&TocEntry=&QField=&QFieldYear=&QFieldMonth=&QFieldDay=&UseQField=&IntQFieldOp=0&ExtQFieldOp=0&XmlQuery=&File=D%3A%5CZYFILES%5CINDEX%20DATA%5C06THRU10%5CTXT%5C00000019%5CP10081RV.txt&User=ANONYMOUS&Password=anonymous&SortMethod=h%7C-&MaximumDocuments=1&FuzzyDegree=0&ImageQuality=r75g8/r75g8/x150y150g16/i425&Display=hpfr&DefSeekPage=x&SearchBack=ZyActionL&Back=ZyActionS&BackDesc=Results%20page&MaximumPages=1&ZyEntry=2#, accessed May 2025.

8 CalEEMod User Guide, Version 2022.1, April 2022, page 35, https://www.caleemod.com/documents/user-guide/01_User%20Guide.pdf, accessed May 2025.

9 Federal Highway Administrations' Roadway Construction Noise Model User's Guide, Final Report, January 2006, https://www.fhwa.dot.gov/environment/noise/construction_noise/rcnm/rcnm.pdf, accessed May 2025.

generate noise levels around or more than 90 dBA at 50 feet away according to the City's CEQA Threshold Guide.[57] Nor is there consideration about larger bulldozers, large/loaded trucks, or caisson drilling equipment. (APP-A2, PDF p. 41.)

[57] See City (2005) L.A. CEQA Thresholds Guide, p. I.1-8 (Exh. I.1-1]), https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/A07.pdf; see also EPA (12/31/71) Noise From Construction Equip. & Operations, Building Equipment, and Home Appliances, pp. 8-26, https://nepis.epa.gov/Exe/ZyPDF.cgi/9101NN3I.PDF?Dockey=9101NN3I.PDF.

RESPONSE TO COMMENT 1A-31

The commenter states the construction equipment list is not realistic. However, the commenter lists equipment that do not apply to the Project. For example, there is no basis to assume rock drilling equipment on the Project Site, since there are no large rocks on the Project Site. The construction equipment assumed for the Project's construction activities are realistic for an infill development in an urban area. Thus, the commenter fails to provide any substantial evidence for these comments.

COMMENT 1A-32

Third, reference noise levels may be underestimated. The noise worksheet references noise levels (Lmax) for the equipment listed, which seem lower than the ranges listed in the City's CEQA Threshold Guide.[58])

[58] See L.A. CEQA Thresholds Guide, ibid., p. I.1-8; EPA Noise Equip., ibid., p. 11.

RESPONSE TO COMMENT 1A-32

The commenter states the referenced noise levels for construction equipment are lower than the ranges listed in the City's CEQA Threshold Guide (Exhibit I.1-1). In order to remain consistent across the noise level calculations and worksheets, the SCEA relied on the FHWA's RCNM model, an industry standard model, which provides noise emissions reference levels and usage factors for various construction equipment and calculations for combining construction equipment noise levels.[10] Thus, the comment that noise levels may be underestimated are not supported by substantial evidence.

[10] Federal Highway Administrations' Roadway Construction Noise Model User's Guide, Final Report, January 2006, https://www.fhwa.dot.gov/environment/noise/construction_noise/rcnm/rcnm.pdf, accessed May 2025.

COMMENT 1A-33

Fourth, noise mitigation seems weak and insufficient. Several of the proposed mitigation measures are flawed (SCEA, pp. 313-14), such as:

- MM-N-1 (avoid operating several pieces of equipment simultaneously) has no performance standards and is susceptible to being unilaterally ignored by the construction crew.

- MM-N-3 (sound barriers) are too short at eight feet to block the line of sight to residents on upper floors, and the performance standard (-12.5 & -10 dBA) may need to achieve even greater attenuation to address the underestimated construction noise impacts (discussed above).

- MM-N-4 (portable blankets during structural framing) may be necessary for all portions of construction, including finishing. Furthermore, active noise monitoring is essential to ensure 5 dBA threshold is not exceeded.

RESPONSE TO COMMENT 1A-33

The commenter states noise mitigation measures in the SCEA are insufficient but the comments are speculative and fail to provide any substantial evidence to support this claim. The Project would incorporate all feasible mitigation measures to reduce construction noise levels from during the construction to levels below the thresholds of significance. As disclosed in the SCEA, through implementation of Mitigation Measures MM-N-1 through MM-N-6 and compliance with City's applicable codes, the Project's construction noise levels would be reduced to the maximum extent feasible and would reduce impacts to a less-than-significant level.

COMMENT 1A-34

3. Operational Noise Impact Analysis Is Incomplete

The SCEA claims composite onsite noise (i.e., HVAC equipment, 5th-level amenity deck, parking) would not exceed thresholds and imposes no mitigations. (SCEA, pp. 315-319.) However, this may not be accurate given that a variety of factors were not considered in the SCEA's analysis, such as the following.

First, there are missing calculations. The SCEA acknowledges that large crowds can gather on the 5th-level amenity decks. (SCEA, p. 317), and claims to provide potential crowd noise based on half of the maximum occupancy speaking (i.e., one-quarter of men at 65 dBA and one-quarter of women at 62 dBA). (Id.) However, no calculations are provided in the worksheets to correlate to the figures provided in Table 4.17 of the SCEA. The SCEA must show the work.

RESPONSE TO COMMENT 1A-34

Crowd noise was analyzed in the SCEA, and the worksheets were inadvertently excluded from Appendix E. The worksheets are provided in Appendix C to the SCEA Erratum.

COMMENT 1A-35

Second, there is no accounting for the Lombard Effect. The SCEA does not account for elevated speech levels in large crowds (a phenomenon known as the Lombard Effect), which can be exacerbated by amplified ambient music, alcohol, and other factors that can collectively create substantially louder noise levels.[59] Studies confirm that in an increase in background noise, like the babble of large crowds, people will increase their speech to raised voice levels (73 dBA at three feet) or even to very loud voice levels (78 dBA at three feet),[60] which has been used in prior City CEQA reviews.[61] These can include impacts to sensitive receptors 2, 4, 5, and 7 (SCEA, Fig. 4.2.)

Third, the SCEA must address the potential for amplified/low-frequency music. The SCEA mentions the ample 5th-level amenity deck as including an outdoor event terrace, pool, and other amenities. (SCEA, pp. 23, 24.) The SCEA does not describe whether amplified music would be provided, ambient or otherwise, or what kind of events would be held, such as disc jockey (DJ) events that feature the unique problem of low-frequency noise impacts. Pubs, nightclubs, and other entertainment uses are unique in that they are characterized by amplified noise predominately at low-frequency between 60-125 Hz (e.g., the thumping of bass beat).[62] Low-frequency noise (less than 250 Hz) presents a unique problem in that it propagates "*with little attenuation*" through walls, windows, and passive noise barriers (e.g., noise absorbing and insulating materials) and even increases sound pressure levels inside rooms.[63] Excessive exposure to low-frequency noise has been linked to a variety of health symptoms including stress, anxiety, headaches, fatigue, depression, difficulty of falling and staying asleep, feeling languid and tensed in the morning.[64] Residents and other noise-sensitive receptors living in urban environments routinely complain about the unique impact of nearby nightclubs featuring loud, bass-thumbing noise.[65]

Fourth, the SCEA does not account for echoes/reflective sounds. The SCEA does not address how the Project will exacerbate existing and new direct noise in the form of reflective noise. It is well known to urban planners that external building facades can reflect noise from sources and increase noise levels to sensitive receptors, particularly in urban environments.[66] This is caused by a receptor being exposed to both a noise source's (1) *direct noise* and (2) *reflected noise* echoing off a reflective surface (e.g., retaining wall, building structure). The combined effect can increase noise levels at a receptor by up to 3 dBA in some instances but often between 1-2 dBA when considering the special relationship of the receptor and source, intervening noise barriers, and absorptive qualities of the reflected surface.[67] However, at frequencies below 500 Hz (like amplified club noise discussed above), urban canyons can increase noise levels up to 10 dBA.[68] For example, existing westbound traffic along the 10 Freeway could reflect Tower 2 (impacting sensitive receptors 1 and 2) (SCEA, Fig. 2.19, 4.2) or create an urban canyon between the Towers (affecting receptor 7) (SCEA Figs. 2.18, 4.2). Additionally, new crowd noise on the 5th-level podium (potentially large, intoxicated crowds with amplified low-frequency music) could reflect off both Towers towards Hope St. and Venice Blvd. (impacting Sensitive Receptors 4, 5, 7) (SCEA, Figs. 2.17, 4.2).

[59] Proceedings of Acoustics (2006) Prediction of Crowd Noise, PDF pp. 2-3, https://www.acoustics.asn.au/ conference_proceedings/AASNZ2006/papers/p46.pdf; Journal of the Acoustical Society of America (May 2013) Evidence That The Lombard Effect Is Frequency-Specific In Humans, PDF pp. 1, 7 (confirm that broadband noise containing speech-similar frequencies "significantly increased" the intensity, duration, and frequency of adult speakers, and not just caused by a general response in an increase in ambient noise, https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3985863/pdf/JASMAN-000134-000640_1.pdf.

[60] Proceedings of Acoustics, ibid.; see also U.S. EPA (12/31/71) Community Noise, PDF pp. 51-53 (Fig. 19 showing a raised voice level [73 dBA @ 3'] for intelligible conversation and Fig. 20 showing a very loud voice level [78 dBA @ 3'] for intelligible conversation at a 3rd-floor high-rise in Downtown Los Angeles), https://nepis.epa.gov/Exe/ZyPDF.cgi/2000PKUG.PDF?Dockey=2000PKUG.PDF.

[61] See e.g., 3400 S. Figueroa St. (DCP Case Nos. ENV-2009-271) Draft EIR Noise Section, PDF p. 34 (utilizing 75 dBA and 71 dBA noise level for male and female speakers, respectively, the mean of which is 73 dBA @ 3' level), https://planning.lacity.org/eir/USC/DEIR/files/IV.H.%20%20%20Noise%20.pdf; 333 S. La Cienega Blvd. (DCP Case Nos. ENV-2015-897) Draft EIR Appendix B- Technical Noise Report, PDF p. 43 (same noise referenced for half of a 100-person crowd on a 4,352-SF, 20th-floor outdoor amenity area), http://planning. lacity.org/eir/333LaCienaga/files/Appendix%20B%20-%20Noise%20Technical%20Report_102015.pdf; accord 11770 Wilshire Blvd. (DCP Case Nos. ENV-2013-3747) Draft EIR Noise Section, PDF p. 31 (300-person crowd on a 11,241-SF outdoor pool deck), https://planning.lacity.org/eir/LandmarkApartments/DEIR/ files/D_IVH.pdf; 1727 Cherokee Ave. (DCP Case Nos. ENV-2013-522) Draft EIR Noise Section, PDF pp. 31-32 (410-person crowd on a 12,522-SF pool/roof decks), https://planning.lacity.org/eir/HollywoodCherokee/ files/DEIR_IV.G.pdf; 2901 E. Olympic Blvd. (DCP Case Nos. ENV-2008-2141) Draft EIR Noise Section, PDF p. 35 (500-person crowd in outdoor areas), https://planning.lacity.org/eir/BoyleHeights/DEIR/files/IV.H.%20Noise.pdf; 930 Wilshire Blvd. (DCP Case Nos. ENV-2009-1577) Draft EIR Appendix IV.C.1-Noise Impact Study, PDF pp. 57-58 (500-person crowd on top of a 8,432-SF podium rooftop terrace), http://www.planning.lacity.org/EIR/WilshireGrandRedevProj/DEIR/DEIR%20Appendices/Appendix%20IV.C.1.pdf; 1900 S. Broadway (DCP Case Nos. ENV-2008-1773) Draft EIR Noise Section, PDF pp. 24-25 (650-person crowd on 8,000-SF restaurant/outdoor space on rooftop level), http://www.planning.lacity.org/EIR/TheReef/deir/ DEIR%20Sections/IV.K.%20Noise.pdf.

[62] Noise & Health (2012) Occupational noise exposure of nightclub bar employees in Ireland, PDF p. 6 ("It is evident that the lower frequencies (63 and 125 Hz) were more prominent than the mid to high frequencies. The 63 and 125 Hz frequencies were higher than 90 dBA in 89% of the nightclubs." Emph. added), https:// arrow.dit.ie/cgi/viewcontent.cgi?article=1002&context=ehsiart; University of Salford (2005) Noise from Pubs and Clubs Final Report, PDF p. 2, 31 (study urging objective rating to assess low-frequency noise from pub and club noise that include "music type, bass level and bass beat."), https://www.dropbox.com/s/xisv5zxy5gk11jr/University%20of%20Salford%20%28Mar.%202005%29%20Noise%20from%20Pubs%20and%20Clubs%20Final%20Report.pdf?dl=0; University of Salford (2005) Noise from Pubs and Clubs- Phase I, PDF pp. 11-12, 37 ("Entertainment noise often has prominent low-frequency content" with "[n]oise levels up to 115 dB Leq in the 63 Hz octave band and 110 dB Leq in the 125 Hz octave band were recorded on dance floors of night clubs." Emph. added), https://pdfs.semanticscholar.org/3b22/cedb67647dd3f8ebbc7 36688389d34108781.pdf.

[63] Noise & Health (2004) Effects of Low Frequency Noise on Sleep ("As low frequencies propagate with little attenuation through walls and windows, many people may be exposed to low frequency noise in

their dwellings ... Indoors, room resonances in the low frequency range will increase the sound pressure levels and also lead to variations of sound pressure level inside the room." Emph. Added), http://www.noiseandhealth. org/article.asp?issn=1463-1741;year=2004;volume=6;issue=23;spage=87;epage=91;aulast=Waye; Applied Acoustics (7/29/16) Design And Experimental Tests Of Active Control Barriers For Low-Frequency Stationary Noise Reduction In Urban Outdoor Environment, PDF p. 1 ("passive techniques are effective in noise reduction at middle-high frequencies, they become less efficient at low frequencies (below 300 Hz) … On the other side, [active noise control] techniques are able to implement a fairly good control of low-frequency noise emissions"), https://www.dropbox.com/s/6xqltnq9tye8zfe/Applied%20Acoustics%20%28July%202016%29%20Design%20And%20Experimental%20Tests%20Of%20Active%20Control%20Barriers%20For%20Low-Frequency%20Stationary%20Noise.pdf?dl=0; Noise & Health (2004) Low frequency noise and annoyance ("As low frequencies propagate with little attenuation through walls and windows, many people may be exposed to low frequency noise in their dwellings."), http://www.noise andhealth.org/article.asp?issn=1463-1741;year=2004;volume=6;issue=23;spage=59;epage=72;aulast=Leventhall; Applied Acoustics (2018) Recreational Noise: Impact And Costs For Annoyed Residents In Milan And Turin, PDF p. 2 ("… low frequencies diffusion through the building structure is particularly serious when discos or late night pubs are located in the building itself." Emph. added), https://www.dropbox.com/s/ykjmw3lvwwyzbzo/Applied%20Acoustics%20%282018%29%20Recreational%20noise_Impact%20and%20costs%20for%20annoyed%20residents%20in%20Milan%20and%20Turin.pdf?dl=0; Building & Environment (2015) Low Frequency Sound Insulation Analysis And Evaluation Of Stiffened Building Structures, PDF p. 2 ("Nowadays, low frequency noise (LFN) is recognized as a serious environmental noise problem and proved to have many negative impacts on residents' health and well-being … However, none of the current single-number rating methods [i.e., STC] has fully considered the frequency range of 20 Hz - 250 Hz." Emph. added), https://www.dropbox.com/s/oatwe75an6l5ass/Building%20%26%20Environment%20%282015%29%20Low%20frequency%20sound%20insulation%20analysis%20and%20evaluation%20of%20stiffened%20building%20structures.pdf?dl=0; Soundproofing Company Inc., (2019) Understanding STC and STC Ratings (… "largest problem with relying on a STC number alone is that STC only considers frequencies down to 125 Hz. This can be misleading because most sound isolation complaints are from noise sources that are below 125 Hz … [such as] Most of the sound energy generated by the average home theater … Guitar, bass, drums …" emph. added), https://www.soundproofingcompany.com/soundproofing_101/understanding-stc- and-stc-ratings.

[64] NOISE-CON 2004 (2004) The Impact of A-weighting Sound Pressure Level Measurements during the Evaluation of Noise Exposure, PDF pp. 3-4, http://storeycountywindfarms.org/ref3_Impact_Sound_Press ure.pdf; Noise & Health (2004) Low frequency noise and annoyance (impacts from 10-200 Hz), http://www.noiseandhealth.org/article.asp?issn=14631741;year=2004;volume=6;issue=23;spage=59;epage=72;aulast=Leventhall; Noise & Health (2004) Evaluation Of Annoyance From Low Frequency Noise Under Laboratory Conditions, http://www.noiseandhealth.org/article.asp?issn=1463-1741;year=2010;volume=12;issue=48;spage=166;epage=181;aulast=Pawlaczyk-Luszczynska; Acoustical Society of America (2009) A Procedure for The Assessment of Low Frequency Noise Complaints, PDF p. 5 (Tbl. II listing symptoms reported), https://www.dropbox.com/s/5t9b79f9dkxejow/Acoustical%20Society%20of%20America%20%282009%29%20A%20Procedure%20for%20The%20Assessment%20of%20Low%20Frequency%20Noise%20Complaints.pdf?dl=0; Noise & Health (2004) Effects of Low Frequency Noise on Sleep, http://www.noiseandhealth.org/article.asp?issn=14631741;year=2004;volume=6;issue=23;spage=87;epage=91;aulast=Waye.

[65] Miami Herald (7/18/17) Downtown Nightclub Owners Want Citations for Loud Music Dismissed ("Residents, armed with their own sound measurements that show that the subwoofer bass beat is especially disruptive …" emph. added), https://www.miamiherald.com/news/local/community/miami-dade/article 162156433.html; Bowery Bookie (7/19/18) When it Comes to Lack of Noise Violations Against Bars, It's All About that Bass ("Anyone who's lived above, adjacent to, or down the block from a boisterous club understands that bass is often the worst noise offender ... Alan Fierstein, an acoustic consultant who assists residents and businesses document noise levels (he's at many CB3 meetings), believes inspectors often fail to record violations 'because they often don't isolate the lower frequencies associated with thumping bass.'" Emph. added), https://www.boweryboogie.com/2018/07/when-it-comes-to-lack-of-noise-violations-against-bars- its-all-about-that-bass/; Brick Underground (2/27/19) Up All Night: NYC Hotels That Generate The Most Noise Complaints ("The hotel has a 4,800-square-foot rooftop pool and bar where parties are held on the weekend. Even guests find the music disruptive. 'It's so loud and the bass is so strong that it's impossible to sleep,' according to one Trip Advisor review." Emph. added), https://www.brickunderground.com/live/nyc- top-10-hotels-generate-most-noise-complaints; Windsor Star (2/20/17) All About That Bass: Downtown Nightclub Must Pay Neighbor $25,000 In Noise Complaint, Court Rules ("…the noise from [the club] is different. 'Boom, boom, boom… like a bass drum beating in my bedroom… like an elephant stomping in my room.'" Emph. added), https://windsorstar.com/news/local-news/all-about-that-bass-downtown-nightclub- must-pay-neighbour-25000-in-noise-complaint-court-rules.

[66] See e.g., McGraw-Hill, Inc. (1991) Handbook of Acoustical Measurements and Noise Control, PDF p. 19 ("… where there are many multistory buildings, even the noise from local sources decreases more slowly (or even increases) owing to the reflections from adjacent buildings." Emph. added), https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/I11.pdf; City of Elk Grove (9/29/11) Draft EIR for Proposed Sphere of Influence Amendment, PDF p. 209 ("In some cases, external building facades can influence reflected noise levels affecting adjacent buildings. This is primarily a problem where high-rise buildings are proposed, and the effect is most evident in urban areas, where an urban canyon may be created."), https://docplayer.net/61698754-City-of-elk-grove-proposed-sphere-of-influence-amendment-draft-environmental-impact-report- lafc-09-10.html; 1020 S. Figueroa St. (DCP Case No. ENV-2015-1159) Draft EIR Noise Section, PDF p. 2 (noting "A receptor located on the same side of the wall as a noise source may actually experience an increase in the perceived noise level as the wall reflects noise back to the receptor, thereby compounding the noise." Emph. added), http://planning.lacity.org/eir/1020SoFigueroa/DEIR/4_G_Noise.pdf; 1211 W. Pico Blvd. (DCP Case No. ENV-2011-0585) Draft EIR Noise Section, PDF p. 2, https://planning.lacity.org/eir/ConventionCntr/DEIR/files/IV.E%20Noise.pdf; LOD (6/22/06) ZA-2005-0365, pp. 10-13 (where "this Zoning Administrator can testify that the sound level in such an environment is significantly higher than that associated with City traffic heard from inside a car" and recognizing drawback of mitigation barriers that can "act as reflectors of the same sound"), http://planning.lacity.org/PdisCaseInfo/Home/GetDocument/YTBiODUzYWMtM2Y0Ni00ZGI5LWJlY2YtZjVmMTNlMjE0MGVm0; California Department of Transportation ("Caltrans") (Aug. 2006) Traffic Noise Analysis Protocol, pp. 17-18 (discussion of reflective noise off noise barriers), http://www.dot.ca.gov/hq/env/noise/pub/2006_protocol.pdf.

[67] See Caltrans (Sep. 2013) Technical Noise Supplement, pp. 2:37-385:27-32, http://www.dot.ca.gov/hq/env/ noise/pub/TeNS_Sept_2013A.pdf.

[68] The Journal of the Acoustical Society of America (2014) Low Frequency Acoustic Resonances In Urban Courtyards, PDF p. 2, https://www.dropbox.com/s/9ji5jzijvkim3xk/The%20Journal%20of%20the%

20Acoustical%20Society%20of%20America%20%282014%29%20Low%20Frequency%20Acoustic%20Res onances%20In%20Urban%20Courtyards.pdf?dl=0.

RESPONSE TO COMMENT 1A-35

The commenter notes the SCEA failed to factor in certain noise effects to the Project's estimated operational noise levels on the 5th level amenity deck provided in the mixed-use building, which would include multi-family residential and neighborhood-serving commercial. The commenter assumes the Project would host loud social events, comparable to night clubs and pubs, which is a speculative claim. Since the Project's open space would be provided to the future residents and guests, it is anticipated that the amenity deck would emit low-level passive noise. The estimated future operational conditions are supported by reliable projections based on the Project's design and capacity rather than hypothetical conditions, such as social events and parties. Moreover, as stated on page 317 of the SCEA, the Project would be subject to LAMC Section 116.01, which prohibits all future users of the Project to willfully make or continue, or cause to be made or continued, any loud, unnecessary, and unusual noise which disturbs the peace or quiet of any neighborhood or which causes discomfort or annoyance to any reasonable person of normal sensitiveness residing in the area. It is not expected that the intended use (i.e., only up to a few people having a conversation, relaxing, or enjoying the outdoors) would violate the prohibition of "loud, unnecessary and unusual noise" criteria. Therefore, the commenter does not provide any evidence to support their claim that the amenity deck area would result in a significant noise impact. As such, noise from the outdoor open space would be less than significant.

COMMENT 1A-36

4. Absent Analysis, Pile Driving Should Be Clearly Barred

The SCEA claims there would be no vibration impacts in part because there is no pile driving proposed for the Project and purposefully removes any mention of pile driving from mitigation measure PPM-NOISE-2. (SCEA, p. 322 [fn 173].) However, neither the SCEA nor the geotechnical report clearly identifies the manner in which foundations and piles are to be installed. (APP-B, pp. 26-30 [generally] & p. 29 [reference vibratory pile driving].) Moreover, absent a clear restriction from pile driving, there is nothing to stop a future property owner/development team from proposing pile driving in the future. A prohibition on pile driving is a fundamental assumption that should be clearly identified in the proposed MMP (presumably attached as enforceable conditions of approval) as opposed to relying on a Building and Safety staff to have the SCEA handy and be aware of footnote 173.

RESPONSE TO COMMENT 1A-36

The commenter states the SCEA failed to analyze the use of pile driving during construction. As shown on page 322 of the SCEA, the Project construction would not include pile driving. Additionally, the Project's conditions of approval would prohibit the use of a pile driver.

COMMENT 1A-37

In sum, the SCEA must be recirculated to include updated noise measurements and analysis of all potential noise sources, including large crowds, as well as consideration of additional mitigation for noise and vibration impacts (discussed infra Section H).

RESPONSE TO COMMENT 1A-37

As determined in Response to Comments 1A.29 through 1A.36 above, the commenter fails to provide substantial evidence that the Project would result in new or increased significant noise impacts beyond those already disclosed in the SCEA.

COMMENT 1A-38

F. The Project Should Not Defer Analysis of Potential PCE/TCE Vapor Intrusion

The potential existence of toxic contamination on a project site is a significant impact requiring CEQA review. (*City of Maywood v. Los Angeles Unified School Dist.* (2012) 208 Cal.App.4th 362, 396; *McQueen v. Board of Directors* (1988) 202 Cal.App.3d 1136." Here, the Site has been subject to a Phase I and Phase II site assessment where tetrachloroethene ("PCE") and trichloroethene ("TCE") were detected in the soil vapor in 2017, which the SCEA claims warrants no further investigation and only requires a Soil Management Plan ("SMP") to be prepared in the future as mitigation (MM-HAZ-1). (SCEA, pp. 273, 276-77.) This conclusion may be incorrect for several reasons, including:

First, the Phase II site assessment may have used the wrong attenuation factors. The 2017 Phase II compared soil vapors to commercial "screening" thresholds established by the Department of Toxic Substances Control ("DTSC"). (APP-D, PDF pp. 873, 875.) It specifically stated that additional evaluation may be warranted for redevelopment for residential uses, not that a mere SMP is all that is necessary. (Id., at 875.) Recently, DTSC and its sister agency (Water Board) have developed new guidance on screening the risk of vapor intrusion, with a particular focus on using attenuation factors that are more health-protective than prior models (i.e., Johnson and Ettinger).[69] (See figure right.)

D1 – Recommended Attenuation Factors for Screening

USEPA recommends empirically-derived AFs as shown in Table 2 (USEPA, 2015a). These conservative AFs are protective of public health under most building occupancy scenarios and can be used for the initial screening of sites in California unless alternative approaches (see D2) are established. Site-specific AFs based on mathematical models, such as the Johnson and Ettinger model, may not be appropriate for the initial screening described in Steps 1 through 3 of this Supplemental Guidance for the following reasons:

Table 2: Medium-Specific Attenuation Factors

Medium	Attenuation Factor
Crawl Space Air	1
Subslab Soil Gas	0.03
Soil Gas	0.03
Groundwater (generic)	0.001
Groundwater (fines)[5]	0.0005

Here, contrary to the new guidance, the Phase II used an attenuation of 0.001 despite being collected just five feet below ground surface ("bgs") and where groundwater is deeper than 100 feet bsg [sic]. (APP-D, PDF pp. 872-874 [see excerpts below].)

Based on a review of groundwater data presented in the State Water Resources Control Board (SWRCB) GeoTracker website, groundwater was not detected to the maximum depth explored of 100-feet below ground surface at a site assessment located at 1600 South Figueroa Street, approximately 255-feet northwest of the Site (*Second Quarter 2017 Remedial Status Report Toyota Dealership 1600 South*

# # #

3.2 SOIL VAPOR SAMPLING

On October 26, 2017, EFI Global directed Optimal Technology to conduct a soil vapor survey throughout the Site to evaluate for the presence of VOCs in the subsurface. A total of ten soil vapor samples (B1 through B10; Figure 2) and one duplicate sample (B10-SV-11 Dup) were collected throughout the Site. Soil vapor sampling depths were set at approximately 5-feet below ground surface (bgs) in locations B1 through B9 and at approximately 5- and 11-feet bgs in location B10.

# # #

There are two methods whereby this formula can be used to evaluate site-specific analytical data, as follows:

- Method 1: Soil vapor sample analytical results can be multiplied by the attenuation factor to calculate the estimated concentrations of VOCs that would be anticipated in indoor air. These estimated concentrations can then be compared directly to the established screening levels for indoor air.
- Method 2: The established screening levels for indoor air can be divided by the attenuation factor to convert them into screening levels for soil vapor. The soil vapor analytical results can then be compared to these calculated screening levels, which represent the maximum concentrations of VOCs that may be present in soil vapor without resulting in an unacceptable risk to building occupants.

For the case of an existing commercial building where soil vapor samples are collected near the contaminant source, an α of 0.001 has been established. Using this attenuation factor and Method 2 above, preliminary screening levels were determined for the Site using indoor air screening levels from two repositories, as follows:

Second, the Phase II does not address vapor intrusion impacting offsite receptors via preferential pathways. Utilities like sewers, storm drains, utilities, and fiber optic cable housing can serve as a "preferential pathway" for vapors.[70] Here, the Phase II fails to address underground utilities or other potential preferential pathways leading to PCE/TCE migration offsite.

Third, deferred mitigation is improper. Instead of analyzing the Site conditions, now, the proposed future SMP is inadequate mitigation because, as the language suggests, the mitigation measures rely on the formation of future plans and potential testing with no performance standards tied to them. This amounts to improper deferred mitigation under CEQA.[71]

In sum, the Phase II performed merely a screening risk assessment (APP-D, PDF p. 875), based on outdated methodologies and specifically stated that further evaluation may be warranted for a residential development. SCEA must be recirculated to include a Vapor Intrusion Human Health Risk Assessment, consistent with updated DTSC guidance, and followed up by an appropriate work plan for any additional remediation that may be required (noted infra Section H).

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69 Final Draft Supplemental Guidance: Screening and Evaluating Vapor Intrusion (Feb. 2023) pp. vii, 8, https://dtsc.ca.gov/wp-content/uploads/sites/31/2023/02/VI_SupGuid_Screening-Evaluating.pdf.

70 Ibid., pp. 5-6, 52-53; USEPA (Jun. 2015) OSWER Technical Guide For Assessing And Mitigating The Vapor Intrusion Pathway From Subsurface Vapor Sources To Indoor Air, PDF pp. 16, 91, https://www.epa.gov/sites/default/files/2015-09/documents/oswer-vapor-intrusion-technical-guide-final.pdf.

71 See e.g., City of Maywood v. Los Angeles Unified School Dist. (2012) 208 Cal.App.4th 362, 407 (CEQA requires lead agencies to "craft mitigation measures that would satisfy enforceable performance criteria."); Concerned Citizens of Costa Mesa, Inc. v. 32nd Dist. Agricultural Assn. (1986) 42 Cal.3d 929, 935 (enforceable performance standards "ensure the integrity of the process of decision making by precluding stubborn problems or serious criticism from being swept under the rug."); Lincoln Place Tenants Ass'n v. City of Los Angeles (2005) 130 Cal.App.4th 1491, 1508 ("Mitigating conditions are not mere expressions of hope."); Federation of Hillside & Canyon Ass'ns v. City of Los Angeles (2000) 83 Cal.App.4th 1252, 1261 ("feasible mitigation measures will actually be implemented as a condition of development."); Oro Fino Gold Mining Corp. v. County of El Dorado (1990) 225 Cal.App.3d 872, 884 ("There cannot be meaningful scrutiny (of an environmental review document) when the mitigation measures are not set forth at the time of project approval.").

RESPONSE TO COMMENT 1A-38

The commenter notes the attenuation factors in the Phase II are incorrect and states that the Project defers mitigation measures with respect to the release of volatile organic compounds (VOCs). The commenter states the SCEA utilized incorrect attenuation factors for vapor intrusion and references CalEPA's Supplemental Guidance document released February 2023. None of the commenter's statements have merit for the reasons presented below.

The Phase II ESA states on page 4 that an attenuation factor of 0.001 was established, which is in compliance with CalEPA's recommended attention factors referenced by the commenter.

The commenter falsely assumes that the soil vapor samples reflect groundwater samples. However, the purpose of the Phase II ESA was to evaluate the impacts from subsurface materials. Therefore, the samples collected for the Phase II ESA were collected from soil, not groundwater.

The commenter also assumes the Project failed to assess the impacts of soil vapor to off-site receptors from preferential pathways, such as sewers and storm drains. However, the commenter's remarks ignore the fact that the Project is proposing to excavate and export up to 28,000 cy of soil during the construction process. As stated in the SCEA, the Project would implement a Soil Management Plan (Mitigation Measure HAZ-1), which would require the safe removal and disposal of any potentially contaminated soil discovered during construction. The commenter speculates contamination would spread to the utilities systems, sewer lines, and storm drains. However, the Project would be required to comply with proper installation procedures when connecting utility infrastructures and storm drains pursuant to their respective agencies (i.e., LADWP, LA Sanitation, and LADBS). The commenter's statements that hazardous materials could enter these pathways are speculative.

The commenter also states the Project would defer mitigation with respect to addressing on-site soil by implementing a Soil Management Plan. However, contaminated soil under the Project Site cannot be fully documented until grading of the Project Site commences; therefore, it would be infeasible to discover the full extent of contamination soils. Thus, the Phase II ESA collected samples throughout the Project Site to evaluated potentially-impacted soils. Based on the subsurface samples that were collected and identified in the Phase II ESA, which confirmed that soil vapor levels were below the commercial screening level of 2.0 µg/l for PCE and 3.0 µg/l for TCE, the Phase II ESA assessment found no evidence of a significant release to the subsurface of the Site that would represent a risk to human health or groundwater beneath the Site. Nevertheless, Mitigation Measure HAZ-1 fully addresses the potential impacts from subsurface hazardous soil with appropriate performance standards, which meets CEQA requirement. Therefore, contrary to the commenter's statement, mitigation measures were not improperly deferred.

In conclusion, as determined above, the commenter does not provide substantial evidence that the hazardous materials assessment findings in the SCEA fall short or that the Project would result in new or increased significant hazardous materials impacts beyond those already addressed in the SCEA.

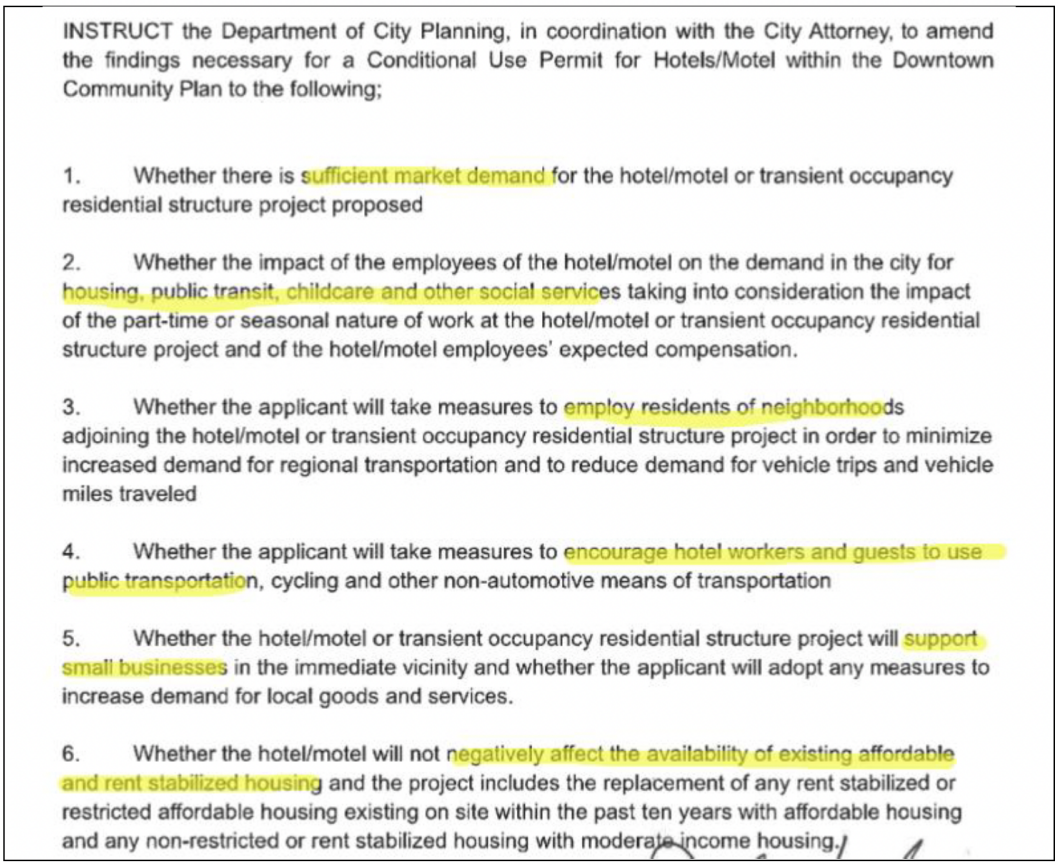
COMMENT 1A-39

G. Land Use Inconsistency Must Be Disclosed

An EIR must identify, fully analyze, and mitigate any inconsistencies between a proposed project and the general, specific, regional, and other plans that apply to the project. (CEQA Guidelines §

15125(d); *Pfeiffer v. City of Sunnyvale City Council* (2011) 200 Cal.App.4th 1552, 1566; *Friends of the Eel River v. Sonoma County Water Agency* (2003) 108 Cal.App.4th 859, 881.) There does not need to be a direct conflict to trigger this requirement; even if a project is "incompatible" with the "goals and policies" of a land use plan, the EIR must assess the divergence between the project and the plan, and mitigate any adverse effects of the inconsistencies. (*Napa Citizens for Honest Government v. Napa County Bd. of Supervisors* (2001) 91 Cal.App.4th 342, 378-79; *Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903 [holding under CEQA that a significant impact exists where project conflicts with local land use policies]; *Friends of "B" Street v. City of Hayward* (1980) 106 Cal.App.3d 988, 998 [held county development and infrastructure improvements must be consistent with adopted general plans] [citing Gov. Code 65302].) Incompatibility with governing land use plans and policies is contrary to the general plan and public welfare and, thus, is an adequate ground to reject the discretionary legislative land use Project Approvals.

Here, the SCEA should consider consistency with downtown hotel-specific CUP requirements that may soon be adopted. The SCEA considers the Project's consistency with the Downtown Los Angeles Community Plan Update ("DTLA 2040"). (SCEA, pp. 11-13, 291-92.) DTLA was adopted in May and June of 2023 (pending form and legality),[72] which was amended to include a hotel-specific CUP subject to six findings, which relate to local hiring, market studies relating to the demand for hotels, expected compensation for future employees, and displacement and replacement of existing housing.[73] (See figure following page.)



INSTRUCT the Department of City Planning, in coordination with the City Attorney, to amend the findings necessary for a Conditional Use Permit for Hotels/Motel within the Downtown Community Plan to the following;

1. Whether there is sufficient market demand for the hotel/motel or transient occupancy residential structure project proposed

2. Whether the impact of the employees of the hotel/motel on the demand in the city for housing, public transit, childcare and other social services taking into consideration the impact of the part-time or seasonal nature of work at the hotel/motel or transient occupancy residential structure project and of the hotel/motel employees' expected compensation.

3. Whether the applicant will take measures to employ residents of neighborhoods adjoining the hotel/motel or transient occupancy residential structure project in order to minimize increased demand for regional transportation and to reduce demand for vehicle trips and vehicle miles traveled

4. Whether the applicant will take measures to encourage hotel workers and guests to use public transportation, cycling and other non-automotive means of transportation

5. Whether the hotel/motel or transient occupancy residential structure project will support small businesses in the immediate vicinity and whether the applicant will adopt any measures to increase demand for local goods and services.

6. Whether the hotel/motel will not negatively affect the availability of existing affordable and rent stabilized housing and the project includes the replacement of any rent stabilized or restricted affordable housing existing on site within the past ten years with affordable housing and any non-restricted or rent stabilized housing with moderate income housing.

In sum, the SCEA should consider the Project's potential inconsistency with these potential new zoning rules, including any new hotel CUP requirement, and minimize them to the extent feasible.

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[72] Council File No. 22-0617, https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=22-0617; DCP, DTLA Update, https://planning.lacity.org/plans-policies/community-plan-update/downtown-los-angeles-community-plan-update.

[73] See Council File No. 22-0617, https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord &cfnumber=22-0617; Amending Motion 54 D, https://clkrep.lacity.org/onlinedocs/2022/22-0617_misc_amd%2054D_kre_price_5-3-23.pdf; Council Action (adopting amending Motion 54 D), https://clkrep.lacity.org/onlinedocs/2022/22-0617_misc_%205-9-2023.pdf; UrbanizeLA (5/5/23) L.A. City Council votes to adopt new community plans for DTLA and Hollywood, https://la.urbanize.city/post/la-city- council-votes-adopt-new-community-plans-dtla-and-hollywood.

RESPONSE TO COMMENT 1A-39

The commenter states the Project should address consistency with the hotel Conditional Use Permit (CUP) requirements discussed in the Downtown Community Plan.[11] The Downtown Community Plan became effective on February 6, 2025. However, as the Project is vested in the processes and procedures as well as the zoning regulations in effect at the time the Application was deemed complete,[12] it is not subject to the requirements of the hotel CUP. Therefore, the Project is not required to analyze consistency with the requirements of the hotel CUP.

COMMENT 1A-40

H. Additional Measures Should Be Considered Or Explained Why Not Feasible

As discussed above, much of the SCEA's analysis is infected by outdated and potentially inaccurate information, relies on questionable models and significance thresholds, and fails to consider various areas of concern. Collectively, these errors may underestimate Project impacts and ultimately lead to less project-level mitigation being considered. Here, numerous feasible mitigations are available, including those recommended by SCAG in its RTP/SCS PEIR MMRP (SCEA, Tbl. 3.3)[74] and similar measures urged by other public agencies (CARB, OPR, CAPCOA, SCAQMD),[75] including but not limited to the following measures that should be considered:

1. *Require proven design features that deliver genuine sustainability,* such as:

    - Achieving LEED Platinum and/or achieving Tier 1 or Tier 2 CalGreen status;

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[11] https://planning.lacity.org/plans-policies/community-plan-update/downtown-los-angeles-community-plan-update

[12] The Application for Case No. CPC-2018-3336 with Environmental Case No. ENV-2018-3337-SCEA was deemed complete on June 11, 2018.

- Maximize onsite solar panels; and
- Increase the total amount of EV chargers by applying requirements (typically a percentage of parking provided) prior to taking any reductions (e.g., bicycle) or to all spaces beyond absolute minimums under local and State laws. [76]

2. *Require more robust TDM measures for hotel operations*. For example, a hotel-specific mandatory commuter reduction program could include:
   - Specific performance level to be reached (e.g., specific VMT or average daily trip reduction or both);
   - Specified participation level (e.g., 100 % employees);
   - Participation in guarantee [sic] ride programs;
   - Inventive employee carpool/vanpool access to preferential parking spaces or hotel valet service or both;
   - Subsidized transit passes for hotel workers and patrons; and
   - Dedicated shuttle service for hotel patrons toward nearby destinations.[77]
3. *Consistent with the State's SB 1383 and City plastic reduction efforts, implementing hotel- specific recycling and food waste programs*. For example, the City should consider hotel- specific recycling programs that includes:
   - Promote recycled paper and other products like soap;
   - Bans on disposable (i.e., designed to be used once and discarded) foodware items and accessories;
   - Allowing customers to bring their own reusable items (if permissible, this be waived to accommodate kosher or other religious standards);
   - Requirements for hand soap in refillable containers;
   - No promotional items made of plastic;
   - No water in plastic bottles or disposable single-use cups;
   - No expanded polystyrene (i.e., Styrofoam);
   - Require reusable napkins and tablecloths with recyclable disposable napkins only allowed for takeout;
   - Hand dryers in areas accessible to customers;
   - Requirement for reusable laundry bags;

- Reusable dishware for room service;
- Eliminate coffee pods/coffee machines that require pods;
- Offer toothpaste tablets in refillable packaging such as glass bottles or jars;
- Provide bamboo toothbrushes;
- Offer toiletries on request rather than automatically;
- Key cards made out of non-plastic materials, including traditional metal keys or wood, bamboo, and paper options for chip-based cards;
- Incentives for returning keys to discourage waste;
- Non-plastic shower caps, razors, shaving cream, slippers, eye masks, ear plugs;
- Remove minifridge items that use plastic;
- Eliminate the use of garbage bags if possible, or use based on compostable material;
- Choose home compostable gloves;
- Do not use plastic wrap;
- Serve employee meals with reusable dishware and cutlery, as well as provide reusable water bottles for all employees with accessible water bottle refill stations;
- Replace paper towels with reusable dish rags; and
- Source plastic-free sponges.[78]

4. *Additional measures urged by public agencies that can help reduce emissions or VMTs or both, such as:*

- Using greywater systems;
- Using lighter-colored (or permeable) pavement and cool roofs where feasible;
- Installing smart HVAC systems that automatically adjust based on occupancy;
- Using cement blended with the maximum feasible amount of flash or other materials that reduce GHG emissions from cement production;
- Incorporating the neighborhood electric vehicle networks;
- Promoting telework options by ensuring high-speed internet (e.g., fiber-optic);
- Achieving Net-Zero GHG emissions;

- Commit to highly efficient commercial equipment, particularly those related to refrigeration, cooling, and heating the building; and

- Purchasing carbon offset credits.[79]

5. *Requiring a percentage of residential units to be affordable units or serve as workforce housing, which multiple public agencies recognize can be a means of reducing VMTs and mobile emissions affecting air quality and GHG.*[80]

6. *Maximize the use of native, drought-resistant landscaping and avoid unnecessary removal, such as to the extent mature street trees can remain in place and be accommodated onsite and not removed. If replacement is required, the City should consider mitigation to the following effect:*

> *All required replacement street trees shall be comprised of California native/indigenous trees. California native/indigenous trees include but are not limited to the trees designated "California Native" on the Tree People City of Los Angeles Approved Street Tree List: https://www.treepeople.org/wp-content/uploads/2021/02/TreePeopl es-LA-City-Approved-Street-Tree-List.pdf. When feasible, new landscaping shall be comprised of California native/indigenous water- conserving plants, in substantial conformance with project plans (provided in Attachment B). California Native/indigenous plants include but are not limited to plants listed by the Metropolitan Water District and the California Native Plant Society in their Planting Guide for LA County: https://www.bewaterwise.com/assets/mwd_plant guide-screen_la_4_23.pdf .*

7. *Full consideration of TCE/PCE mitigation prior to granting the City Approval, such as the preparation of a human health risk assessment for TCE/PCE vapor intrusion risk, consistent with current DTSC guidance, and followed up with the development of a remedial work plan that removes all sources of contamination to residential standards and addresses any potential for offsite migration via preferential pathways.*

8. *Robust noise and vibration mitigation, such as:*

- Require ground floor sound barriers to be at least 15 feet high and require portable sound blankets for upper-story construction during the entirety of the Project construction;

- Place active noise monitors near sensitive receptors and establish a protocol that ensures the immediate stoppage of work when noise thresholds are exceeded and specific actions to be taken prior to work resuming;

- Places physical and operational measures to reduce operational noise impacts, such as sufficiently thick and high guard rails to block the line of sight of noise sources, limiting amplified music, barring all live and DJ events, directing speakers away from

sensitive receptors, placing master volume controls on equipment, and include active noise monitoring around the permitter of the 5th-level amenity deck; and

- Absent further analysis, explicitly bar pile driving.

In sum, the SCEA's flawed analysis underestimates significant impacts that should be mitigated via additional measures, including but not limited to those above. Local 11 urges the City to recirculate the SCEA to fix said errors and consider the above-listed mitigation measures.

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74 https://scag.ca.gov/sites/main/files/file-attachments/exhibit-a_connectsocal_peir.pdf?1606004156.

75 SCAG (Dec. 2019) Final Program EIR, pp. 2.0-18 – 2.0-71 (see "project-level mitigation measures" for air quality, GHG, and transportation impacts), https://scag.ca.gov/sites/main/files/file-attachments/fpeir_connectsocal_complete.pdf?1607981618; CARB 2022 Scoping Plan, 4, 7, 24, 29 & Appendix D, pp. 23, https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/2022-scoping-plan-documents; CARB's 2017 Scoping Plan, Appendix B-Local Action, pp. 1-8, 7-9 & Appendix D, p. 2, https://www.arb.ca.gov/cc/scopingplan/app_b_local_action_final.pdf; OPR (Dec. 2018) Technical Advisory, pp. 27, https:// opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf; CAPCOA (Dec. 2021) Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity, pp. 31-32, 73, 76, 80-96, https://www.airquality.org/ClimateChange/Documents/Final%20Handbook_ AB434.pdf; CAPCOA (Aug. 2010) Quantifying GHGs and Mitigation, pp. 64-74, https://www.contracosta.ca.gov/DocumentCenter/View/34123/CAPCOA-2010-GHG-Quantification-PDF.

76 Which City Planning Commission ("CPC") supported for other projects. (See CPC (11/17/22) Item Audio, appx. mm:ss 48:40 – 49:00, https://planning.lacity.org/plndoc/Audio/CPC/2022/11-17-2022/7_CPC_202 1_4937_CU_DB_SPR_WDI_HCA.mp3.)

77 See e.g., Santa Monica Municipal Code § 9.5.130(B)(2)(b); https://www.octa.net/getting-around/rideshare/oc-rideshare/employers/guaranteed-ride-home-program/; https://www.ci.healdsburg.ca.us/AgendaCenter/ViewFile/Item/3098?fileID=21731;

78 See e.g., https://www.nytimes.com/2022/05/17/travel/clean-the-world-hotel-soap.html; https://freakonomics.com/podcast/the-economics-of-everyday-things-used-hotel-soaps/; https://cleantheworld.org/; https://bluestandard.com/guides/hotel-guide/; https://clkrep.lacity.org/onlinedocs/2021/21-0064_ord_187718_1-23-23.pdf.

79 See e.g., CARB's 2022 Scoping Plan, supra fn 67, pp. 4, 7, 24, 29; CARB's 2017 Scoping Plan, supra fn 67, pp. 1-8; SCAG's 2020 RTP/SCS Program EIR, supra fn 67, pp. 2.0-23 – 2.0-25, 2.0-40 – 2.0-43; CAPCOA GHG Reductions Handbook, supra fn 67, pp. 31-32; OPR Technical Advisory, supra fn 67, p. 27.

80 See e.g., CARB, 2022 Scoping Plan, Appendix D, pp. 23, https://ww2.arb.ca.gov/our-work/programs/ab-32- climate-change-scoping-plan/2022-scoping-plan-documents; CARB's 2017 Scoping Plan, Appendix D, pp. 2, https://www.arb.ca.gov/cc/scopingplan/app_b_local_action_final.pdf; SCAG's 2020 RTP/SCS Program EIR, ibid, pp. 2.0-42, https://scag.ca.gov/sites/main/files/file-attachments/dpeir_connectsocal_executivesum mary.pdf?1606002543; CAPCOA (2022) GHG Reductions Handbook, pp. 73, 76, 80-96, https://www.caleemod.com/documents/handbook/full_handbook.pdf; OPR Technical Advisory, pp. 27, http://opr.ca.gov/

RESPONSE TO COMMENT 1A-40

The commenter states the SCEA does not implement all feasible mitigation measures applicable to the Project and goes on to list multiple measures that should have been applied to the Project. Per CEQA Guidelines Section 15126.4(a)(3), mitigation measures are not required for effects which are not found to be significant or where already adopted mitigation is sufficient to reduce impacts to less than significant. As discussed throughout the SCEA, where the Project may result in a potentially significant impact, the SCEA identified the applicable mitigation to ensure less-than-significant impacts. The recommended measures listed above are not mandatory project design features or required mitigation measures. The recommended measures contain several voluntary items to be considered by the Applicant and are provided for the administrative record. As this comment letter does not raise any specific environmental issues related to the analysis in the SCEA, no further analysis is required.

COMMENT 1A-41

III. CONCLUSION

In sum, Local 11 is concerned with the Project's potentially significant impact on air quality, GHG, VMTs, energy, noise/vibration, hazards, and inconsistency with applicable land use rules.

Collectively, the SCEA errors discussed herein mask potentially significant impacts that can be lessened via project-specific mitigated added to the Project's MMP. Until such time, the SCEA fails to incorporate applicable mitigation contrary to CEQA requirements. (See Pub. Res. Code § 21155.2(a).) Thus, Local 11 respectfully asks the City to stay action on the Project Approvals until the various errors are cured in a CEQA-compliant recirculated SCEA that incorporates additional mitigation noted outlined in Section H above.

Local 11 reserves the right to supplement this appeal justification at future hearings and proceedings for this Project. (See *Galante Vineyards v. Monterey Peninsula Water Management Dist.* (1997) 60 Cal.App.4th 1109, 1120 [CEQA litigation not limited only to claims made during EIR comment period].) This Office requests, to the extent not already on the notice list, all notices of CEQA actions and any approvals, Project CEQA determinations, or public hearings to be held on the Project under state or local law requiring local agencies to mail such notices to any person who has filed a written request for them. (See Pub. Res. Code §§, 21092.2, 21167(f) and Gov. Code § 65092 and LAMC § 197.01.F.) Please send notice by electronic and regular mail to Jordan R. Sisson, Esq., 801 S. Grand Avenue, 11th Floor, LA, CA 90017 (jordan@gideonlaw.net).

Thank you for consideration of these comments. We ask that this letter be placed in the administrative record for the Project.

RESPONSE TO COMMENT 1A-41

As discussed in Response to Comments 1A-2 through 1A-40, above, the information presented by the commenter is not applicable and/or erroneous and does not provide substantial evidence to support their assertions that the Project would result in any new significant impacts beyond

those already disclosed in the SCEA. Pursuant to CEQA Guidelines Section 15064(f)(5), substantial evidence includes fact, a reasonable assumption predicated upon fact, or expert opinion supported by fact. Substantial evidence is not argument, speculation, unsubstantiated opinion or narrative, evidence that is clearly inaccurate or erroneous, or evidence of social or economic impacts that do not contribute to, or are not caused by, physical impacts on the environment (PRC Sections 21080(d) and (e). Preparation of an EIR, recirculation of the SCEA, or implementation of additional mitigation measures is not required. As such, no further analysis is required.

COMMENT LETTER NO. 1B

UNITE HERE Local 11
GK Law
Jordan R. Sisson
801 South Grand Avenue, 11th Floor
Los Angeles, CA 90017
November 23, 2023

COMMENT 1B-1

Mr. Fukuda—We are withdrawing the previously submitted comment letter. Please confirm. Enjoy your Thanksgiving.

Rey—To be clear, on behalf of UNITE HERE, we are formally withdrawing/rescinding our prior letter sent invertedly [sic]. It should *not* be forwarded to decisionmakers or part of the record here. Please confirm or call me if you have any questions about this formal withdrawal.

RESPONSE TO COMMENT 1B-1

The commenter rescinds their comments discussed in Comment Letter 1A, above. Nevertheless, responses to their comments were provided and concluded that the commenter does not provide substantial evidence to support their assertions that the Project would result in any new significant impacts or that recirculation of the SCEA is required. No further analysis is required.

COMMENT LETTER NO. 2A

Western States Regional Council of Carpenters (WSRCC)
Mitchell M. Tsai Law Firm
Reza Bonachea Mohamadzadeh
139 South Hudson Avenue, Suite 200
Pasadena, CA 91101
November 20, 2023

COMMENT 2A-1

On behalf of the Western States Regional Council of Carpenters (WSRCC), this office is submitting these comments in regard to the Sustainable Communities Environmental Assessment (SCEA) for the City of Los Angeles' ("City") South Park Towers Project ("Project").

The Project, characterized by Los Angeles City Planning as "mixed-use" and proposed by Venice Hope Group LLC ("Applicant"), proposes to demolish and replace a collection of four small commercial office/retail buildings with two high-rise towers. The completed development would include 300 hotel rooms, 250 residential units, 13,000 square feet of ground-floor retail uses, and podium parking for 288 vehicles. The two towers would be comprised of a 22-story, dual flag hotel building fronting Flower Street and a 23-story residential building at Hope Street. Renderings portray a pair of contemporary glass-and-steel structures with landscaped amenity decks at the podium and roof levels, as well as additional spaces carved into the sides of the towers. Other project components would include fitness centers, private patios, and meeting space for the hotel, which would sit one block south of Metro's Pico Station. The Project will include an approximate total of 452,630 square feet of floor area. The Project is proposed at 1600-1618 South Flower Street, 1601-1623 South Hope Street, 426-440 West Venice Boulevard, Los Angeles, California 90015 ("Site").

Applicant is requesting the following discretionary actions:

(1) Pursuant to Los Angeles Municipal Code (LAMC) §§ 17.01 and 17.15, a Vesting Tentative Tract Map to create one master ground lot and to subdivide the site into four airspace lots for a high-density mixed-use Project;

(2) Pursuant to LAMC § 14.5.6(B), a Transfer of Floor Area Rights for the transfer of approximately 226,121 square feet of floor area;

(3) Pursuant to LAMC § 12.24(W)(1), a Conditional Use Permit for the sale of a full-line of alcoholic beverages for on-site consumption only within the proposed hotel;

(4) Site Plan Review pursuant to LAMC § 16.05 for the construction of 250 dwelling units, 300 hotel rooms and 13,120 square feet of ground-floor commercial floor area;

(5) Pursuant to LAMC § 12.21(G), a Director's Determination to allow for up to a 10% reduction in the total required usable open space;

(6) Pursuant to LAMC § 12.24(S), a 20% decrease in the required parking for the hotel; and

(7) Pursuant to LAMC § 12.32(S), approval of a Supplemental Use Sign District (SN) to permit a sign district.

WSRCC is a labor union representing over 90,000 union carpenters in 12 states, including California, and has a strong interest in well-ordered land use planning and in addressing the environmental impacts of development projects. Individual members of WSRCC live, work, and recreate in the City and the surrounding communities and would be directly affected by the Project's environmental and social impacts.

WSRCC expressly reserves the right to supplement these comments at or prior to hearings on the Project, and at any later hearing and proceeding related to this Project. Gov. Code, § 65009, subd. (b); Pub. Res. Code, § 21177, subd. (a); see *Bakersfield Citizens for Local Control v. Bakersfield* (2004) 124 Cal.App.4th 1184, 1199-1203; see also *Galante Vineyards v. Monterey Water Dist.* (1997) 60 Cal.App.4th 1109, 1121.

WSRCC incorporates by reference all comments raising issues regarding the Project and its environmental review and associated documents and reports. See *California Clean Energy Committee v. City of Woodland* (2014) 225 Cal.App.4th 173, 191 (citing Citizens for Open *Government v. City of Lodi* (2006) 144 Cal.App.4th 865, 875) (finding that any party who has objected to a project's environmental documentation may assert any issue timely raised by other parties); see also *Santa Teresa Citizen Action Group v. City of San Jose* (2003) 114 Cal.App.4th 689, 701 (citing Pub. Res. Code, § 21177, subds. (a)-(b)) (to attack a decision that is subject to CEQA, the alleged grounds for noncompliance must have been presented to the public agency, and the person attacking the decision must have raised some objection during the administrative proceedings).

Moreover, WSRCC requests that the City provide notice for any and all notices referring or related to the Project issued under CEQA (Pub. Res. Code, § 21000 et seq.), and the California Planning and Zoning Law ("Planning and Zoning Law") (Gov. Code, §§ 65000–65010). California Public Resources Code, §§ 21092.2 and 21167(f) and California Government Code § 65092 require agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency's governing body.

RESPONSE TO COMMENT 2A-1

This comment introduces the commenter and acknowledges their review of the prepared SCEA. It should be noted that this comment letter was rescinded as shown in Commenter Letter 2B,

below. Nevertheless, it is incorporated into the administrative record along with Response to Comments 2A-2 through 2A-11.

This comment provides the commenter's statement of interest with respect to representing the Southwest Carpenters labor union, comprised of 90,000 union carpenters in 12 states. However, their legal standing is vague since no information as to the location of specific individual members' residences are provided, which would provide the context for how these individuals would be impacted by the Project. Impacts associated with localized air emissions and noise, for example, are limited to the immediate Project area, generally within a 500-foot radius or less. Thus, this labor union would not be impacted by the Project's localized impacts if they live, work, or recreate in areas that are outside the area of potential impacts. In addition, any workers, who are employed on the construction of the Project, would be protected by existing Occupational Safety and Health Administration (OSHA) laws and regulations.

COMMENT 2A-2

I. THE CITY SHOULD REQUIRE THE USE OF A LOCAL SKILLED AND TRAINED WORKFORCE TO BENEFIT THE CITY'S ECONOMIC DEVELOPMENT AND THE ENVIRONMENT.

The City should require that the Project be built using local workers who have graduated from a Joint Labor-Management Apprenticeship Program approved by the State of California, have at least as many hours of on-the-job experience in the applicable craft which would be required to graduate from such a program, or are registered apprentices in such a program.

Community benefits such as local hire can also be helpful to reduce environmental impacts and improve the positive economic impacts of the Project. Local hire provisions requiring that a certain percentage of workers reside within 10 miles or less of the Project site can reduce the length of vendor trips, reduce greenhouse gas emissions, and provide localized economic benefits. As environmental consultants Matt Hagemann and Paul E. Rosenfeld note:

> [A]ny local hire requirement that results in a decreased worker trip length from the default value has the potential to result in a reduction of construction-related GHG emissions, though the significance of the reduction would vary based on the location and urbanization level of the project site.

March 8, 2021, SWAPE Letter to Mitchell M. Tsai re Local Hire Requirements and Considerations for Greenhouse Gas Modeling. Workforce requirements promote the development of skilled trades that yield sustainable economic development. As the California Workforce Development Board and the University of California, Berkeley Center for Labor Research and Education concluded:

> [L]abor should be considered an investment rather than a cost—and investments in growing, diversifying, and upskilling California's workforce can positively affect returns on

> climate mitigation efforts. In other words, well-trained workers are key to delivering emissions reductions and moving California closer to its climate targets.[1]

Furthermore, workforce policies have significant environmental benefits given that they improve an area's jobs-housing balance, decreasing the amount and length of job commutes and the associated greenhouse gas (GHG) emissions. In fact, on May 7, 2021, the South Coast Air Quality Management District found that the "[u]se of a local state-certified apprenticeship program" can result in air pollutant reductions.[2]

Locating jobs closer to residential areas can have significant environmental benefits. As the California Planning Roundtable noted in 2008:

> People who live and work in the same jurisdiction would be more likely to take transit, walk, or bicycle to work than residents of less balanced communities and their vehicle trips would be shorter. Benefits would include potential reductions in both vehicle miles traveled and vehicle hours traveled.[3]

Moreover, local hire mandates and skill-training are critical facets of a strategy to reduce vehicle miles traveled (VMT). As planning experts Robert Cervero and Michael Duncan have noted, simply placing jobs near housing stock is insufficient to achieve VMT reductions given that the skill requirements of available local jobs must match those held by local residents.[4] Some municipalities have even tied local hire and other workforce policies to local development permits to address transportation issues. Cervero and Duncan note that:

> In nearly built-out Berkeley, CA, the approach to balancing jobs and housing is to create local jobs rather than to develop new housing. The city's First Source program encourages businesses to hire local residents, especially for entry- and intermediate-level jobs, and sponsors vocational training to ensure residents are employment-ready. While the program is voluntary, some 300 businesses have used it to date, placing more than 3,000 city residents in local jobs since it was launched in 1986. When needed, these carrots are matched by sticks, since the city is not shy about negotiating corporate participation in First Source as a condition of approval for development permits.

Recently, the State of California verified its commitment towards workforce development through the Affordable Housing and High Road Jobs Act of 2022, otherwise known as Assembly Bill No. 2011 (AB2011). AB2011 amended the Planning and Zoning Law to allow ministerial, by-right approval for projects being built alongside commercial corridors that meet affordability and labor requirements.

The City should consider utilizing local workforce policies and requirements to benefit the local area economically and to mitigate GHG emissions, improve air quality, and reduce transportation impacts.

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[1] California Workforce Development Board (2020) Putting California on the High Road: A Jobs and Climate Action Plan for 2030 at p. ii, available at https://laborcenter.berkeley.edu/wp-content/uploads/2020/09/ Putting-California-onthe-High-Road.pdf.

[2] South Coast Air Quality Management District (May 7, 2021) Certify Final Environmental Assessment and Adopt Proposed Rule 2305 – Warehouse Indirect Source Rule –Warehouse Actions and Investments to Reduce Emissions Program, and Proposed Rule 316 – Fees for Rule 2305, Submit Rule 2305 for Inclusion Into the SIP, and Approve Supporting Budget Actions, available at http://www.aqmd.gov/docs/defaultsource/Agendas/Governing-Board/2021/2021-May7-027.pdf?sfvrsn=10.

[3] California Planning Roundtable (2008) Deconstructing Jobs-Housing Balance at p. 6, available at https://cproundtable.org/static/media/uploads/publications/cpr-jobshousing.pdf.

[4] Cervero, Robert and Duncan, Michael (2006) Which Reduces Vehicle Travel More: Jobs-Housing Balance or Retail-Housing Mixing? Journal of the American Planning Association 72 (4), 475-490, 482, available at http://reconnectingamerica.org/assets/Uploads/UTCT-825.pdf.

RESPONSE TO COMMENT 2A-2

The commenter makes several statements that are either unrelated to significant environmental issues analyzed in the SCEA or are inaccurately categorized as applying to the Project.

First, the commenter states that the Applicant should include additional community benefits, such as requiring local hire and use of a skilled and trained workforce, to build the Proposed Project. It should be noted that even though there is no express legal requirement to incorporate local hire provisions, the Project is already committed to using union construction trades labor for this Project, which is anticipated to include local hire and skilled and trained workforce construction personnel. Pursuant to LAMC Section 12.14, the proposed buildings with mixed-use multi-family and commercial land uses are explicitly permitted uses in the C2 zone. The Applicant has complied with all applicable zoning and land use requirements and will pay all development impact fees required by local and state law. There are no additional zoning requirements, ordinances, or land use policies that mandate additional community benefits for the Project.

Second, the commenter states that the hiring of local workforce for the Project's construction would reduce environmental impacts, including those related to VMT and air pollutant/GHG emissions, and increase the economic impact of the Project. As discussed in the SCEA, the Project would not result in significant air quality and GHG impacts, and no mitigation measures are required. As there are no significant impacts that need to be further addressed or mitigated, no further response is required.

COMMENT 2A-3

II. THE CALIFORNIA ENVIRONMENTAL QUALITY ACT.

A. Background Concerning Environmental Impacts Reports.

The California Environmental Quality Act is a California statute designed to inform decision-makers and the public about the potential significant environmental effects of a project. CEQA

Guidelines, § 15002, subd. (a)(1).[5] At its core, its purpose is to "inform the public and its responsible officials of the environmental consequences of their decisions before they are made." *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564.

CEQA directs public agencies to avoid or reduce environmental damage, when possible, by requiring alternatives or mitigation measures. CEQA Guidelines, § 15002, subds. (a)(2)-(3); see also *Berkeley Keep Jets Over the Bay Committee v. Board of Port Commissioners of the City of Oakland* (2001) 91 Cal.App.4th 1344, 1354; *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 400. The Environmental Impact Report (EIR) serves to provide public agencies and the public in general with information about the effect that a proposed project is likely to have on the environment and to "identify ways that environmental damage can be avoided or significantly reduced." CEQA Guidelines, § 15002, subd. (a)(2). If the project has a significant effect on the environment, the agency may approve the project only upon finding that it has "eliminated or substantially lessened all significant effects on the environment where feasible" and that any unavoidable significant effects on the environment are "acceptable due to overriding concerns" specified in Public Resources Code § 21081. See CEQA Guidelines, §§ 15092, subds. (b)(2)(A)-(B).

While the courts review an EIR using an 'abuse of discretion' standard, the reviewing court is not to uncritically rely on every study or analysis presented by a project proponent in support of its position. Berkeley Keep Jets, supra, 91 Cal.App.4th at p. 1355 (quoting *Laurel Heights, supra*, 47 Cal.3d at pp. 391, 409 fn. 12) (internal quotations omitted). A clearly inadequate or unsupported study is entitled to no judicial deference. *Ibid*. Drawing this line and determining whether the EIR complies with CEQA's information disclosure requirements presents a question of law subject to independent review by the courts. *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 515; *Madera Oversight Coalition, Inc. v. County of Madera* (2011) 199 Cal.App.4th 48, 102, 131. As the First District Court of Appeal has previously stated, prejudicial abuse of discretion occurs if the failure to include relevant information precludes informed decision-making and informed public participation, thereby thwarting the statutory goals of the EIR process. Berkeley Keep Jets, supra, 91 Cal.App.4th at p. 1355 (internal quotations omitted).

The preparation and circulation of an EIR is more than a set of technical hurdles for agencies and developers to overcome. *Communities for a Better Environment v. Richmond* (2010) 184 Cal.App.4th 70, 80 (quoting *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 449-450). The EIR's function is to ensure that government officials who decide to build or approve a project do so with a full understanding of the environmental consequences and, equally important, that the public is assured those consequences have been considered. *Ibid.* For the EIR to serve these goals it must present information so that the foreseeable impacts of pursuing the project can be understood and weighed, and the public must be given an adequate opportunity to comment on that presentation before the decision to go forward is made. *Ibid*.

A strong presumption in favor of requiring preparation of an EIR is built into CEQA. This presumption is reflected in what is known as the "fair argument" standard under which an EIR must be prepared whenever substantial evidence in the record supports a fair argument that a project may have a significant effect on the environment. *Quail Botanical Gardens Found., Inc. v. City of Encinitas* (1994) 29 Cal.App.4th 1597, 1602; *Friends of "B" St. v. City of Hayward* (1980) 106 Cal.3d 988, 1002.

The fair argument test stems from the statutory mandate that an EIR be prepared for any project that "may have a significant effect on the environment." Pub. Res. Code, § 21151; see *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.App.3d 68, 75 (hereafter, "*No Oil*"); accord *Jensen v. City of Santa Rosa* (2018) 23 Cal.App.5th 877, 884 (hereafter, "*Jensen*"). Under this test, if a proposed project is not exempt and may cause a significant effect on the environment, the lead agency must prepare an EIR. Pub. Res. Code, §§ 21100, subd. (a), 21151; CEQA Guidelines, §§ 15064, subds. (a)(1), (f)(1). An EIR may be dispensed with only if the lead agency finds no substantial evidence in the initial study or elsewhere in the record that the project may have a significant effect on the environment. *Parker Shattuck Neighbors v. Berkeley City Council* (2013) 222 Cal.App.4th 768, 785. In such a situation, the lead agency must adopt a negative declaration. Pub. Res. Code, § 21080, subd. (c)(1); CEQA Guidelines, §§ 15063, subd. (b)(2), 15064, subd. (f)(3).

"Significant effect upon the environment" is defined as "a substantial or potentially substantial adverse change in the environment." Pub. Res. Code, § 21068; CEQA Guidelines, § 15382. A project may have a significant effect on the environment if there is a reasonable probability that it will result in a significant impact. *No Oil, supra*, 13 Cal.App.3d at p. 83 fn. 16; see *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 309 (hereafter, "*Sundstrom*"). If any aspect of the project may result in a significant impact on the environment, an EIR must be prepared even if the overall effect of the project is beneficial. CEQA Guidelines, § 15063, subd. (b)(1); see *County Sanitation Dist. No. 2 v. County of Kern* (2005) 127 Cal.App.4th 1544, 1580.

This standard sets a "low threshold" for preparation of an EIR. *Consolidated Irrigation Dist. v. City of Selma* (2012) 204 Cal.App.4th 187, 207; *Nelson v. County of Kern* (2010) 190 Cal.App.4th 252; *Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903, 928; *Bowman v. City of Berkeley* (2004) 122 Cal.App.4th 572, 580; *Citizen Action to Serve All Students v. Thornley* (1990) 222 Cal.App.3d 748, 754; *Sundstrom, supra*, 202 Cal.App.3d at p. 310. If substantial evidence in the record supports a fair argument that the project may have a significant environmental effect, the lead agency must prepare an EIR even if other substantial evidence before it indicates the project will have no significant effect. See *Jensen, supra*, 23 Cal.App.5th at p. 886; *Clews Land & Livestock v. City of San Diego* (2017) 19 Cal.App.5th 161, 183; *Stanislaus Audubon Society, Inc. v. County of Stanislaus* (1995) 33 Cal.App.4th 144, 150; *Brentwood Assn. for No Drilling, Inc. v. City of Los Angeles* (1982) 134 Cal.App.3d 491; *Friends of "B*" St., 106 Cal.App.3d 988; CEQA Guidelines, § 15064, subd. (f)(1).

B. Background Concerning Initial Studies, Negative Declarations, and Mitigated Negative Declarations.

CEQA and its Guidelines are strict and unambiguous about when a Mitigated Negative Declaration (MND) may be used. A public agency must prepare an EIR whenever substantial evidence supports a "fair argument" that a proposed project "may have a significant effect on the environment." Pub. Res. Code, §§ 21100, 21151; CEQA Guidelines, §§ 15002, subds. (f)(1)-(2), 15063; *No Oil, supra*, 13 Cal.App.3d at p. 75; *Communities for a Better Environment v. California Resources Agency* (2002) 103 Cal.App.4th 98, 111-112. Essentially, should a lead agency be presented with a fair argument that a project may have a significant effect on the environment, the lead agency shall prepare an EIR even though it may also be presented with other substantial evidence that the project will not have a significant effect. CEQA Guidelines, §§ 15064(f)(1)-(2); see *No Oil, supra*, 13 Cal.App.3d at p. 75 (internal citations and quotations omitted). Substantial evidence includes "enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached." CEQA Guidelines, § 15384, subd. (a).

The fair argument standard is a "low threshold" test for requiring the preparation of an EIR. *No Oil, supra*, 13 Cal.App.3d at p. 84; County Sanitation, supra, 127 Cal.App.4th at p. 1579. It "requires the preparation of an EIR where there is substantial evidence that any aspect of the project, either individually or cumulatively, may cause a significant effect on the environment, regardless of whether the overall effect of the project is adverse or beneficial[.]" *County Sanitation, supra*, 127 Cal.App.4th at p. 1580 (quoting CEQA Guidelines, § 15063, subd. (b)(1)). A lead agency may adopt an MND only if "there is no substantial evidence that the project will have a significant effect on the environment." CEQA Guidelines, § 15074, subd. (b).

Evidence supporting a fair argument of a significant environmental impact triggers preparation of an EIR regardless of whether the record contains contrary evidence. *League for Protection of Oakland's Architectural and Historical Resources v. City of Oakland* (1997) 52 Cal.App.4th 896, 904-905. "Where the question is the sufficiency of the evidence to support a fair argument, deference to the agency's determination is not appropriate[.]" *County Sanitation, supra*, 127 Cal.App.4th at p. 1579 (quoting *Sierra Club v. County of Sonoma* (1992) 6 Cal.App.4th 1307, 1317-1318).

Further, it is the duty of the lead agency, not the public, to conduct the proper environmental studies. "The agency should not be allowed to hide behind its own failure to gather relevant data." *Sundstrom, supra*, 202 Cal.App.3d at p. 311. "Deficiencies in the record may actually enlarge the scope of fair argument by lending a logical plausibility to a wider range of inferences." *Ibid*; see also *Gentry v. City of Murrieta* (1995) 36 Cal.App.4th 1359, 1382 (lack of study enlarges the scope of the fair argument which may be made based on the limited facts in the record).

Thus, refusal to complete recommended studies lowers the already low threshold to establish a fair argument. The court may not exercise its independent judgment on the omitted material by

determining whether the ultimate decision of the lead agency would have been affected had the law been followed. *Environmental Protection Information Center v. Cal. Dept. of Forestry* (2008) 44 Cal.4th 459, 486 (internal citations and quotations omitted). The remedy for this deficiency would be for the trial court to issue a writ of mandate. *Ibid*.

Both the review for failure to follow CEQA's procedures and the fair argument test are questions of law, thus, the de novo standard of review applies. Vineyard Area *Citizens for Responsible Growth v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 435. "Whether the agency's record contains substantial evidence that would support a fair argument that the project may have a significant effect on the environment is treated as a question of law. *Consolidated Irrigation Dist., supra*, 204 Cal.App.4th at p. 207; Kostka and Zischke, Practice Under the Environmental Quality Act (2017, 2d ed.) at § 6.76.

In the MND context, courts give no deference to the agency. The agency or the court should not weigh expert testimony or decide on the credibility of such evidence—this is the EIR's responsibility. As stated in *Pocket Protectors v. City of Sacramento*:

> Unlike the situation where an EIR has been prepared, neither the lea agency nor a court may "weigh" conflicting substantial evidence to determine whether an EIR must be prepared in the first instance. Guidelines section 15064, subdivision (f)(1) provides in pertinent part: if a lead agency is presented with a fair argument that a project may have a significant effect on the environment, the lead agency shall prepare an EIR even though it may also be presented with other substantial evidence that the project will not have a significant effect. Thus, as Claremont itself recognized, [c]onsideration is not to be given contrary evidence supporting the preparation of a negative declaration.

(2004) 124 Cal.App.4th 903, 935 (internal citations and quotations omitted).

In cases where it is not clear whether there is substantial evidence of significant environmental impacts, CEQA mandates erring on the side of a "preference for resolving doubts in favor of environmental review." *Mejia v. City of Los Angeles* (2005) 130 Cal.App.4th 322, 332 "The foremost principle under CEQA is that the Legislature intended the act to be interpreted in such manner as to afford the fullest possible protection to the environment within the reasonable scope of the statutory language. *Friends of Mammoth v. Bd. of Supervisors* (1972) 8 Cal.3d 247, 259.

As explained further below, the IS/MND here fails to make certain essential findings. Further, for a number of findings which the IS/MND does make, it fails to offer support with sufficient analysis and substantial evidence, or it fails to incorporate adequate mitigation measures. Therefore, there is a fair argument that the Project will have a significant effect on the environment, triggering the "low threshold" standard for preparation of an EIR.

C. Background Concerning CEQA Exemptions.

Where a lead agency chooses to dispose of CEQA by asserting a CEQA exemption, it has a duty to support its CEQA exemption findings by substantial evidence, including evidence that there are no applicable exceptions to exemptions. This duty is imposed by CEQA and related case law. CEQA Guidelines, § 15020 (lead agency shall not knowingly release a deficient document hoping that public comments will correct the defects); see *Citizens for Environmental Responsibility v. State ex rel. 14th Dist. Agriculture Assn.* (2015) 242 Cal.App.4th 555, 568 (lead agency has the burden of demonstrating that a project falls within a categorical exemption and must support the determination with substantial evidence); accord *Assn. for Protection etc. Values v. City of Ukiah* (1991) 2 Cal.App.4th 720, 732 (lead agency is required to consider exemption exceptions where there is evidence in the record that the project might have a significant impact.)

The duty to support CEQA and exemption findings with substantial evidence is also required by the Code of Civil Procedure (CCP) and case law on administrative or traditional writs. Under the CCP, an abuse of discretion is established if the decision is unsupported by the findings, or the findings are unsupported by the evidence. CCP, § 1094.5, subd. (b). In *Topanga Assn. for a Scenic Comm. v. County of Los Angeles*, our Supreme Court held that implicit in CCP § 1094.5 is a requirement that the agency which renders the challenged decision must set forth findings to bridge the analytic gap between the raw evidence and ultimate decision or order. (1977) 11 Cal.3d 506, 515 (internal citations and quotations omitted) (hereafter, "*Topanga*"). The lead agency's findings may be determined to be sufficient if a court has no trouble under the circumstances discerning the analytic route the administrative agency traveled from evidence to action. *West Chandler Blvd. Neighborhood Assn. vs. City of Los Angeles* (2011) 198 Cal.App.4th 1506, 1521-1522 (internal citations and quotations omitted). However, "mere conclusory findings without reference to the record are inadequate." *Ibid*. at p. 1521 (finding city council findings conclusory in violation of *Topanga)*.

Further, CEQA exemptions must be narrowly construed to accomplish CEQA's environmental objectives. *Cal. Farm Bureau Federation v. Cal. Wildlife Conservation. Bd.* (2006) 143 Cal.App.4th 173, 187; accord *Save Our Carmel River v. Monterey Peninsula Water Management Dist.* (2006) 141 Cal.App.4th 677, 697 ("These rules ensure that in all but the clearest cases of categorical exemptions, a project will be subject to some level of environmental review.")

Finally, CEQA procedures reflect a preference for resolving doubts in favor of environmental review. See Pub. Res. Code, § 21080, subd. (c) (an EIR may be disposed of only if there is no substantial evidence, in light of the entire record before the lead agency, that the project may have a significant effect on the environment or revisions in the project); CEQA Guidelines, §§ 15061, subd. (b)(3) (common sense exemption only where it can be seen *with certainty*); 15063, subd. (b)(1) (prepare an EIR if the agency determines that there is substantial evidence that any aspect of the project, either individually or cumulatively, may cause a significant effect on the environment, regardless of whether the overall effect of the project is adverse or beneficial]; 15064, subd. (h) (the agency must consider cumulative impacts of past, current, and probable

future projects); 15070 (a negative declaration may be prepared only if there is no substantial evidence, in light of the whole record, that the project may have a significant effect on the environment, or project revisions would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and there is no substantial evidence, in light of the whole record, that the project as revised may have a significant effect on the environment); *No Oil, supra*, 13 Cal.App.3d at pp. 83-84 (significant impacts are to be interpreted so as to afford the fullest possible protection).

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[5] The CEQA Guidelines, codified in Title 14 of the California Code of Regulations, § 15000 et seq., are regulatory guidelines promulgated by the state Natural Resources Agency for the implementation of CEQA. Pub. Res. Code, § 21083. The CEQA Guidelines are given "great weight in interpreting CEQA except when . . . clearly unauthorized or erroneous." *Center for Biological Diversity v. Dept. of Fish & Wildlife* (2015) 62 Cal.4th 204, 217.

RESPONSE TO COMMENT 2A-3

The above comment provides information from case laws and the State CEQA Guidelines regarding the basic purpose of CEQA, EIRs, Initial Studies, Negative Declarations, and Mitigated Negative Declarations, and CEQA Exemptions. As this comment does not raise any CEQA issues related to the Project or the SCEA, no further response is required.

COMMENT 2A-4

III. THE PROJECT DOES NOT MEET THE CRITERIA FOR THE USE OF A SUSTAINABLE COMMUNITIES ENVIRONMENTAL ASSESSMENT.

A. Background Regarding Sustainable Communities Environmental Assessments.

To achieve its objectives of environmental protection, CEQA has a three-tiered structure. CEQA Guidelines, § 15002, subd. (k); see also *Comm. to Save the Hollywoodland Specific Plan v. City of Los Angeles* (2008) 161 Cal.App.4th 1168, 1185-86. First, if a project falls into an exempt category, or it can be seen with certainty that the activity in question will not have a significant effect on the environment, no further agency evaluation is required. CEQA Guidelines, § 15002, subd. (k) Second, if there is a possibility the project will have a significant effect on the environment, the agency must perform a threshold initial study. CEQA Guidelines, § 15063, subd. (a); *Comm. To Save the Hollywoodland Specific Plan v. City of Los Angeles* (2008) 161 Cal.App.4th 1168, 1185-86. If the study indicates that there is no substantial evidence that the project may cause a significant effect on the environment the agency may issue a negative declaration. CEQA Guidelines, §§ 15063, subd. (b)(2), 15070; *Comm. to Save the Hollywoodland Specific Plan v. City of Los Angeles* (2008) 161 Cal.App.4th 1168, 1185-86. Finally, if the project will have a significant effect on the environment, an EIR is required. CEQA Guidelines, § 15002,

subd. (k); see also *Comm. to Save the Hollywoodland Specific Plan v. City of Los Angeles* (2008) 161 Cal.App.4th 1168, 1185-86.

Where a Project is determined to be a "Transit Priority Project" (TPP) under Senate Bill 375 (SB 375), a slightly different framework is applied. SB 375 provides CEQA-based incentives and streamlining for certain residential, mixed-use, and transportation-oriented developments. SB 375 includes two optional CEQA streamlining options for local lead agencies.

First, under SB 375, residential and mixed-use projects that: (1) are consistent with the use designation, density, building intensity, and applicable policies specified in a California Air Resources Board (CARB)-approved sustainable communities strategy (SCS) or alternative planning strategy (APS) and (2) incorporate mitigation measures required by an "applicable prior environmental document," which may include the environmental impact report for the regional transportation plan, need not reference, describe or discuss growth-inducing impacts or project-specific or cumulative impacts on global warming or on the regional transportation network arising from automobiles or light-duty truck trips generated by the project. Pub, Res. Code, § 21159.28, subd. (a).

Second, TPPs that are consistent with the SCS or APS may qualify for a total CEQA exemption or a SCEA. Pub. Res. Code, §§ 21155.1-21155.2. A TPP is a specific project that must: (1) be consistent with a CARB-approved SCS or APS; (2) contain at least 50 percent residential use, and if the project contains between 26 percent and 50 percent nonresidential uses, then a floor area ratio of not less than 0.75; (3) have a minimum net density of 20 units per acre; and, (4) be located within one-half of a mile of a major transit stop or high-quality transit corridor included in a regional transportation plan. Pub. Res. Code, § 21155.

A TPP may be reviewed through a SCEA provided, *inter alia*, that: (1) an initial study identifies "all significant or potentially significant impacts of the transit priority project. . . based on substantial evidence in light of the whole record" (Pub. Res. Code, § 21155.2, subd. (b)(1)); (2) the SCEA contains "measures that either avoid or mitigate to a level of insignificance all potentially significant or significant effects of the project required to be identified in the initial study" (Pub. Res. Code, § 21155.2, subd. (b)(2)); and, (3) "the lead agency's decision to review and approve a transit priority project with a sustainable communities environmental assessment" is "reviewed under the substantial evidence standard" (Pub. Res. Code, § 21155.2, subd. (b)(7)). A SCEA is similar to a negative declaration in that the lead agency must identify and analyze all potentially significant or significant effects of the project and mitigate them to a level of less than significant.

Prior to acting on the SCEA, the lead agency must consider all comments received. Pub. Res. Code, § 21155.2, subd. (b)(4). According to Public Resources Code section 21155.2(b)(5), a SCEA may be approved by the lead agency after the lead agency conducted a public hearing, reviewed the comments received, and found that:

A) All potentially significant or significant effects required to be identified in the initial study have been identified and analyzed.

B) With respect to each significant effect on the environment required to be identified in the initial study, either of the following apply:

i) Changes or alterations have been required in or incorporated into the project that avoid or mitigate the significant effects to a level of insignificance.

ii) Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.

Pub. Res. Code, § 21155.2, subd. (b)(5).

Notably, under Public Resources Code section 21159.28(a), a SCEA does not exempt agencies from their duty to review all other impacts of the project, including but not limited to impacts to historical resources. As to all those impacts, CEQA continues to require studies and mitigation, as well as an EIR to thoroughly assess all feasible mitigation measures and alternatives.

"The EIR is often referred to as the heart of CEQA." *Cnty. of Butte v. Dept. of Water Resources* (2022) 13 Cal.5th 612, 627 (internal citations and quotations omitted). Ideally, an EIR serves to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided. *Id*.; Pub. Res. Code, § 21002.1, subd. (a).) The document must include a description of the proposed project and its environmental setting and discussions of (1) the possible environmental effects of the project, (2) feasible measures to mitigate any significant, adverse environmental effects of the project, (3) the comparative environmental effects of a range of reasonable alternatives to the proposed project, including a "no project" alternative, and (4) the cumulative impact of the project's various environmental effects. CEQA Guidelines, §§ 15124, 15126, 15126.4, 15126.6, 15130. An EIR may also include a discussion of the economic and social effects of the project. *Id*., § 15131. Given the role it plays and its required analysis, the EIR is commonly referred to as an "informational document." Pub. Res. Code, § 21061; CEQA Guidelines, § 15121. It serves to inform decision makers and the general public about the nature and environmental impact of a proposed project, feasible ways to reduce that impact (often through the mechanism of mitigation measures), and possible alternatives to the project. Pub. Res. Code, § 21061. *Id*. (internal citations and quotations omitted).

Second, TTPs may qualify for a total CEQA exemption or a Sustainable Communities Environmental Assessment. Pub. Res. Code, §§ 21155.1-21155.2. First and foremost, a TPP is a specific project that must: (1) be consistent with a CARB-approved SCS or APS; (2) contain at least 50 percent residential use, and if the project contains between 26 percent and 50 percent nonresidential uses, then a floor area ratio of not less than 0.75; (3) have a minimum net density of 20 units per acre; and (4) be located within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan. Pub. Res. Code, § 21155, subds. (a)-(b) (emphases added).

If a legislative body of a city or county finds, after conducting a public hearing, that a transit priority project meets all of the requirements in subdivisions (a) and (b) and one of the requirements of subdivision (c) of Public Resources Code section 21155.1, the TPP is declared to be a sustainable communities project and will be fully exempt from CEQA. At a minimum, the legislative body of a city or county must find that the project can be adequately served by existing utilities and that:

(1) The project site does not contain wetlands or riparian areas or have significant value as wildlife habitat,

(2) The project does not have a significant effect on historical resources,

(3) The project buildings are energy efficient,

(4) Landscaping is designed to achieve 25 percent less water usage, and

(5) The project does not present a risk of public health exposure in violation of state or federal law.

Pub. Res. Code, § 21155.1.

Alternatively, if a TPP project does not qualify for an exemption, a TPP may be reviewed through a SCEA provided, *inter alia*, that: (1) an initial study identifies "all significant or potentially significant impacts of the transit priority project . . . based on substantial evidence in light of the whole record" (2) the SCEA shall contain "measures that either avoid or mitigate to a level of insignificance all potentially significant or significant effects of the project required to be identified in the initial study." Pub. Res. Code, § 21155.2, subds. (b)(1)-(2).

Simply put, a SCEA is similar to a negative declaration in that the lead agency must identify and analyze all potentially significant or significant effects of the project and mitigate them to a level of less than significant. Pub. Res. Code, § 21155.2, subd. (b).

A SCEA may be approved by the lead agency after conducting a public hearing, reviewing the comments received, and finding that: (A) all potentially significant or significant effects required to be identified in the initial study have been identified and analyzed, (B) with respect to each significant effect on the environment required to be identified in the initial study, either of the following apply: (i) changes or alterations have been required in or incorporated into the project that avoid or mitigate the significant effects to a level of insignificance, and (ii) those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that agency. Pub. Res. Code, §21155.2, subd. (b)(5).

The lead agency's decision to review and approve a transit priority project with a sustainable communities environmental assessment" is "reviewed under the substantial evidence standard." Pub. Res. Code, § 21155.2, subd. (b)(7). As such, any SCEA determination or finding made by the agency has to be supported by substantial evidence, where "[s]ubstantial evidence is not

argument, speculation, unsubstantiated opinion or narrative, [or] evidence that is clearly erroneous or inaccurate[.]" See Pub. Res. Code, § 21080(e)(2); see also CEQA Guidelines, § 15384, subd. (a).

RESPONSE TO COMMENT 2A-4

The comment provides information from the State CEQA Guidelines regarding the basic purpose of SCEAs. The commenter states the Project does not meet the criteria for the use of a SCEA; however, as further addressed below, all SCEA criteria are met, and no substantial evidence was provided to the contrary.

COMMENT 2A-5

B. The Project is Not Within a Transit Priority Area Because the SCAG's HQTA Designation is neither Reliable nor Binding

Under Public Resources Code section 21099(b)(3), a transit priority area is "an area within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a transportation improvement program or applicable regional transportation plan."

According to the SCEA, the Project Site is located within both a High-Quality Transit Area (HQTA) and Transit Priority Area. Yet, CEQA provides for streamlining with SCEA only if the Project is truly a TPP; i.e., first and foremost "within one-half mile of a major transit stop or high-quality transit corridor [HQCT] included in a regional transportation plan." Pub. Res. Code, § 21155, subd. (b) (emphasis added).

SCAG itself distinguishes an HQTA (referenced and relied upon by the City) from an HQTC, and the Project Site's being located within SCAG's HQTA has no bearing under CEQA or its Guidelines regarding TPPs—neither does that qualify as substantial evidence required for SCEA to show that the Project qualifies as a TPP as the precondition for SCEA.

A HQTA is a planning tool that is part of SCAG RTP/RTS, a regional plan. HQTAs are broadly defined as places with convenient public transit service prioritized by local jurisdictions that are suitable for housing, jobs and services growth.

Per SCAG's own summary and disclaimer:

> The High Quality Transit Areas (HQTAs) is within one half-mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours.
>
> This is the High Quality Transit Areas (HQTAs) in the SCAG Region for plan year 2045, developed for the Final Connect SoCal (the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)). SCAG's HQTA is within one-half

> mile from a “major transit stop” and a “high-quality transit corridor” and developed based on the language in SB375 and codified in the CA Public Resources Code. The definitions of a “major transit stop” and a “high-quality transit corridor” are as follows:
>
> A. Major transit stop: A site containing an existing rail or bus rapid transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods (CA Public Resource Code Section 21064.3). It also includes major transit stops that are included in the applicable regional transportation.
>
> B. High-quality transit corridor (HQTC): A corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.
>
> Further explanation of the methodology for identifying HQTCs and major transit stops is included in the Connect SoCal Transit Technical Report Appendix.
>
> PLEASE NOTE that SCAG has made one modification to its methodology of HQTAs development to exclude the one-half mile areas around freeway-running HQTCs where there are no bus stops; the one-half mile areas around bus stops serving those freeway HQTCs remain.
>
> Major transit stops and HQTCs are based on the 2045 plan year transit network of Connect SoCal. PLEASE NOTE that SCAG updates its inventory of planned major transit stops and HQTCs with the adoption of a new RTP/SCS, once every four years. However, transit planning studies may be completed by transit agencies on a more frequent basis than the RTP/SCS is updated by SCAG. Users should consult with the appropriate transit provider(s) to obtain the latest information on planned transit routes, stop locations, and service intervals. This data is intended for planning purposes only, and SCAG shall incur no responsibility or liability as to the completeness, currentness, or accuracy of this information. SCAG assumes no responsibility arising from use of this information by individuals, businesses, or other public entities. The information is provided with no warranty of any kind, expressed or implied, including but not limited to the implied warranties of merchantability and fitness for a particular purpose. Users should consult with the appropriate transit provider(s) to obtain the latest information on transit routes, stop locations, and service intervals before making determinations regarding CEQA exemption or streamlining.”[6]

SCAG claims that its GIS Map “SCAG’s HQTA is within one-half mile from a “major transit stop” and a “high-quality transit corridor” and developed based on the language in SB375 and codified in the Public Resources Code.

However, for its criteria, “SCAG uses the total population of bus trips during the combined seven–hour morning and afternoon peak periods to determine the peak frequency at a bus stop. This is

done for each bus route, by direction. The peak frequency is calculated by dividing 420 minutes (the seven–hour peak converted to minutes) by the total peak bus trips. This average frequency should be 15 minutes or less in order to qualify. [emphasis added]"[7]

In addition, SCAG itself does not allow for combining routes to qualify for bus interval frequencies, but does so in certain situations:

> Corridors with Multiple Overlapping Bus Routes
>
> Separate but overlapping bus routes that do not individually meet the 15- minute [sic] threshold may not be combined in order to qualify as an HQTC. However, based on RTTAC feedback, there are certain corridors where overlapping "line families" or local/bus rapid transit (BRT) lines are intended to function as one bus route. On these corridors, transit riders typically board the first bus available, whether it be a local, express, or BRT line. For these line families or local/BRT corridors, SCAG uses the combined routes to calculate the frequency."

Ibid. (emphases added).

A recent ruling from the court as against the City of Los Angeles found that combining bus routes to meet the peak-hour 15-minute intervals and to thereby qualify for a major transit stop is improper and does not qualify as substantial evidence that a particular intersection is a major transit stop as defined and contemplated by CEQA and other relevant rules and regulations, including the City's own definitions of a major transit stop. See Exhibit D, esp. pp. 16-19. [*HI Point Neighbors' Assn. v City of Los Angeles*; Filed March 9, 2023; LASC No. 21STCP02223.

As quoted above, SCAG provides a disclaimer and notes that its "maps and data are intended for planning purposes only. . . . [and] recommends that [l]ocal jurisdictions . . . consult with the appropriate transit provider(s) to obtain the latest information on transit routes, stop locations, and service intervals before making determinations regarding CEQA exemption[s] or streamlining." As such, these SCAG maps do not outright designate a parcel as having certain location within transit priority areas, and this data depiction is not made for purposes of evaluating a Project's environmental impacts under CEQA.

Moreover, as noted by SCAG, its maps and bus service intervals need to be verified by public agencies for currentness and accuracy. There is no evidence in the record City had performed such a verification. Our own research similarly suggests that there is no qualifying major transit stop or transit priority corridor within the ½ mile of the Project site either as required by CEQA and Public Resources Code section 21155(b).

Accordingly, the ZIMAS TPA classification, as well as SCAG's Transit Priority Area or High Quality Transit Area or Corridor, for the purposes cited in the SCEA, are irrelevant and non-binding; they are also unsupported by substantial evidence.

Therefore, the SCEA has failed to demonstrate that the Project is located within an HQTC or a major transit stop, and failed to meet the first and foremost critical precondition to qualify as a TPP and SCEA under CEQA. Pub. Res. Code, § 21155, subd. (b).

SB 375 requires regional planning agencies to include a sustainable communities strategy in their regional transportation plans. Gov. Code, § 65080, subd.(b)(2)(B). CEQA Guidelines section 15125(d) provides that an EIR "shall discuss any inconsistencies between the proposed project and…regional plans. Such regional plans include . . . regional transportation plans." Thus, CEQA requires analysis of any inconsistencies between the Project and the relevant RTP/SCS plan.

In April 2016, SCAG adopted the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy ("2016-2040 RTP/SCS")[8], which includes policies and strategies to will help the region achieve GHG emission reductions that would reduce the region's per capita transportation emissions by eight percent by 2020 and 18 percent by 2035.[9] SCAG's RTP/SCS plan is based upon the same requirements outlined in CARB's 2017 Scoping Plan and SB 375.

On September 3, 2020, SCAG adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, titled Connect SoCal ("2020-2045 RTP/SCS" or "Connect SoCal").[10] The 2020 RTP/SCS adopts policies and strategies aimed at reducing the region's per capita GHG emissions by 8% below 2005 per capita emissions levels by 2020 and 19% below 2005 per capita emissions levels by 2035.[11]

For both the 2016-2040 RTP/SCS and Connect SoCal, SCAG prepared Program Environmental Impact Reports (PEIR) that include Mitigation Monitoring and Reporting Programs (MMRP) that list project-level environmental mitigation measures that directly and/or indirectly relate to a project's GHG impacts and contribution to the region's GHG emissions.[12] These environmental mitigation measures serve to help local municipalities when identifying mitigation to reduce impacts on a project-specific basis that can and should be implemented when they identify and mitigate project-specific environmental impacts.

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6 See https://gisdata-scag.opendata.arcgis.com/datasets/SCAG::high-quality-transit-areashqta-2045-scag-region/about, accessed April 3, 2023 (bold emphasis orig.; underlining added).

7 See, https://scag.ca.gov/sites/main/files/fileattachments/twg101619fullagn.pdf?1602535716

8 Southern California Association of Governments (SCAG) (April 2016) The 2016-2040 Regional Transportation Plan / Sustainable Communities Strategy: A Plan for Mobility, Accessibility, Sustainability and a High Quality of Life ("SCAG 2016-2040 RTP/SCS"), available at https://scag.ca.gov/sites/main/files/fileattachments/f2016rtpscs.pdf?1606005557.

9 Id. at pp. 8, 15, 153, 166.

10 SCAG (Sept. 2020) Connect SoCal: The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments (SCAG Connect SoCal"), available at https://scag.ca.gov/sites/main/files/fileattachments/ 0903fconnectsocal-plan_0.pdf?1606001176.

11 Id. at xiii.

[12] SCAG (April 7, 2016) Resolution No. 16-578-1: A Resolution of the Southern California Association of Government Certifying the Final Program Environmental Impact Report Prepared for the 2016 – 2040 Regional Transportation Plan / Sustainable Communities Strategy (SCH#2015031035) and Adopting Findings of Fact, a Statement of Overriding Considerations and a Mitigation, Monitoring and Reporting Program Pursuant to the California Environmental Quality Act, Exhibit B, "Mitigation Monitoring and Reporting Program," available at https://scag.ca.gov/sites/main/files/fileattachments/2016fpeir_exhibitb_mmrp.pdf?1623887711; see also SCAG (Sept. 3, 2020) A

RESPONSE TO COMMENT 2A-5

The commenter states the Project Site is not within a Transit Priority Area because SCAG's HQTA designation is not reliable. The comment does not make the connection between high quality transit areas (HQTA) and high-quality transit corridors (HQTC). SCAG defines HQTA as the radius within 0.5 mile from major transit stops and an HQTC.[13] Therefore, if a project site is located within an HQTA, it is also located within 0.5 mile of an HQTC. As noted in Figure 3.2 of the SCEA, the Project Site and its surrounding vicinity are located within an HQTA and, thus, located within 0.5 mile of an HQTC.

The commenter also challenges the reliability and accuracy of SCAG's mapping tools to accurately map an HQTA. However, the Project Site is served by two nearby Metro light rail stations within 0.5 mile: the Pico Station, which serves the Metro A Line and Metro E Line, located approximately 0.3 mile north of the Project Site; and the Grand/LATTC Station, which serves the Metro Blue Line, located approximately 0.3 mile southeast of the Project Site. Based on the most current Metro schedules, effective December 10, 2023, both the Metro A and E Lines operate every 10 minutes during commute peak hours.[14] Additionally, the Project Site is located adjacent to the bus stop at Venice Boulevard and Hope Street, which serves the Metro Local 33 bus line with a headway of less than 10 minutes during commute peak hours. Therefore, based on current analysis of bus and rail lines in the area, the Project Site is adequately served by transit and is located within an HQTC pursuant to PRC Section 21155, and the Project meets the definition of a TPP.

COMMENT 2A-6

C. The Project May Have a Significant Effect on Historical Resources.

The proposed Project calls for the demolition of several structures. SCEA II Project Description, p. II-7. According to the Project Application filed with the City, the Applicant indicated that four structures will be removed or demolished.

[13] SCAG, Connect SoCal, adopted September 3, 2020, Exhibit 3.8.

[14] See Metro Maps and Schedules, website: https://cdn.beta.metro.net/wp-content/uploads/2023/12/01154124/801_TT_12-10-23-1.pdf, accessed June 2024 for Line A and https://cdn.beta.metro.net/wp-content/uploads/2023/12/01154128/804_TT_12-10-23-1.pdf for Line E, accessed June 2024.

According to the Cultural Resources report prepared for the SCEA, at least one structure located at the Project Site was not recommended as eligible under the California Register of Historical Resources (CRHR). The Cultural Resources report, however, did recommend that that structure is eligible under the City of Los Angeles Historical-Cultural Monuments (HCM) criteria 1 and 3, but did not recommend it to be eligible as a contributing resource to any historic district or eligible as a contributor to any potential historic district.

Furthermore, the SCEA directly concludes that although the new construction and parts of the proposed renovation for the garage conform with many of the Standards, the loss of some of the materials, features, character, and spatial relationships of the historic building means the project does not fully comply with Standards. Therefore, the proposed Found Residences Project will result in an adverse change in the significance of a historical resource and significant impacts pursuant to CEQA Section 21084.1.

However, Public Resources Code section 21084.1 states that a project:

> [M]ay cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. For purposes of this section, an historical resource is a resource listed in, or determined to be eligible for listing in, the California Register of Historical Resources …. The fact that a resource is not listed in, or determined to be eligible for listing in, the California Register of Historical Resources, not included in a local register of historical resources, or not deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1 shall not preclude a lead agency from determining whether the resources may be an historical resources for purposes of this section.

CEQA Guidelines section 15064.5(a)(4) further echoes that, stating:

> The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code sections 5020.1(j) or 5024.1.

As such, pursuant to both Public Resources Code section 21084.1 and CEQA Guidelines section 15064.5, the fact that a project is not listed, determined to be, or registered as a historical resource does not preclude an agency's determination that the project is a historical resource.

In turn, CEQA Guidelines section 15064.5(a)(3) provides that a resource may be treated as historical and further mandates:

> Generally, a resource shall be considered by the lead agency to be "historically significant" if the resources meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code §5024.1, Title 14 CCR, Section 4852) including the following:
>
> (A) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
>
> (B) Is associated with the lives of persons important in our past;
>
> (C) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
>
> (D) Has yielded, or may be likely to yield, information important in prehistory or history.

As such, based on the fact that one of the structures to be demolished at the Project Site's was expressly found to meet at least one relevant criteria to qualify as a historical monument HCM and also would admittedly have adverse impacts on historical resources, the City's ultimate use of a SCEA for the Project here is improper given that a SCEA, unlike an EIR, does not allow for identification of all feasible mitigation measures and alternatives, including alternatives sites. Indeed, there is substantial evidence that the structure may, among other things, "embod[y] the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values." CEQA Guidelines, § 15064.5, subd. (a)(3)(C).

Accordingly, the Project may result in significant impacts to historical resources and the City must prepare an EIR to study and mitigate those impacts.

RESPONSE TO COMMENT 2A-6

The commenter states the Project may result in significant impacts to historical resources by misquoting the conclusions in the Historic Resource Assessment (Appendix I.1 of the SCEA) falsely identifying a building as eligible under the City of Los Angeles Historical-Cultural Monuments (HCM) criteria 1 and 3. The commenter refers to the building located at 1611 S. Hope Street and misinterprets the information provided in the Historic Resource Assessment. On page 28, the Historic Resource Assessment states that, while [the building] "1601-1611 does indeed meet most of the above eligibility standards, it has been so altered over the years, it unrecognizable [sic] from how it appeared when it was used as an auto-related business and lacks sufficient integrity to convey its significance. Therefore, Building A is not eligible under criterion A/1/1. SurveyLA findings for the Central City CPA identified a number of properties that appear eligible as auto related commercial properties that retain integrity, but Building A was not one that was identified." Additionally, on page 32, the Historic Resource Assessment states "while Building A appears to be significant as an early example of a building type that supplied auto parts, the building has been substantially altered, lacks sufficient integrity to convey significance,

and is therefore not eligible for listing in the National or California Registers or locally as a local HCM." Therefore, none of the four buildings appear eligible as a historic resource or contribute to any designated historic district. The comment misinterprets the historic analysis contained within the Historic Resource Assessment prepared for the Project. Thus, no substantial evidence is presented of a potential significant impact or that the Historic Resource Assessment was flawed.

COMMENT 2A-7

D. The Project Fails to Incorporate All Feasible Mitigation Measures Contained in SCAG's 2016-2040 RTP/SCS and Connect SoCal and Therefore the Project Cannot Be Adequately and Legally Evaluated Under a SCEA.

Section 21155.2 of the Cal. Public Resources Code requires that a transit priority project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable environmental impact reports. However, the Project's SCEA expressly rejects many, if not most, of the applicable mitigation measures identified in SCAG's 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy ("2020-2045 RTP/SCS" or "Connect SoCal"; and its respective Plan Environmental Impact Report[13] without making a feasibility determination.

First, the SCEA fails to incorporate SCAG's provided feasible mitigation measures; instead, it claims it complies with those based on its compliance with various standard regulations and would thereby reduce the Project's impacts to less than significant levels, obviating the need for SCAG's Mitigation Measures.

For example, for SCAG's Mitigation Measure PMM-GEO-1, the SCEA states that:

> [T]he Proposed Project already complies to this Mitigation Measure as it is subject to the building construction protocols for reducing seismic hazards as provided in the Los Angeles Municipal Code and applicable regulations. Compliance would help avoid or reduce the potentially significant effects on the potential for projects to result in the exposure of people and infrastructure to the effects of earthquakes, seismic related ground-failure, liquefaction, and seismically induced landslides, that are in the jurisdiction and responsibility of public agencies, regulatory agencies, and/or Lead agencies. The Proposed Project would also comply with all seismic standards provided in the California Building Code.

In other words, the SCEA conflates SCAG's Mitigation Measures with simply compliance with the law and suggests that the City or the Applicant had a legal option not to comply with the law or that SCAG's Mitigation Measures contain no further requirement. As a result of such erroneous assumptions, the SCEA fails to assess the need for or the feasibility of implementing SCAG's Mitigation Measure PMM-GEO-1.

Similarly, for Mitigation Measure PMM HYD-1, the SCEA states that "[f]ull compliance with the LID Plan, SUSMP, and implementation of design-related best management practices would ensure operation of the Proposed Project would not violate any water quality standards and discharge requirements or otherwise substantially degrade water quality" and thus concludes that the Project "would result in a less than significant impact" and that "[n]o mitigation is required and this mitigation measure is not applicable."

Stated otherwise, the SCEA relies on standard and non-site-specific regulatory compliance measures to conclude that the project would have no impacts and therefore no further mitigation measures or SCAG's Mitigation Measures are required. Not so. According to CEQA Guidelines section 15064(b)(2), "[c]ompliance with the threshold does not relieve a lead agency of the obligation to consider substantial evidence indicating that the project's environmental effects may still be significant." See also Jensen v. City of Santa Rosa (2018) 23 Cal.App.5th 877, 885 ("Thresholds of significance are not used to determine automatically whether a given effect will or will not be significant. Instead, thresholds of significance are indicative only that an environmental effect that crosses the threshold "'will normally be determined to be significant,'" while effects not crossing the threshold "'normally will be determined to be less than significant'" by the agency").

Moreover, it is well-settled that "[c]ompliance with the law is not enough to support a finding of no significant impact under . . . CEQA." *Californians for Alternatives to Toxics v. Department of Food & Agriculture* (2005) 136 Cal.App.4th 1, 15-17 (finding that a lead agency "abused its discretion by relying on DPR's regulatory scheme as a substitute for performing its own evaluation of the environmental impacts of using pesticides."); see also *Ebbetts Pass Forest Watch v Dept. of Forestry & Fire Protection* (2008) 43 Cal. App. 4th 936, 956 (fact that Department of Pesticide Regulation had assessed environmental effects of certain herbicides in general did not excuse failure to assess effects of their use for specific timber harvesting project); *California Clean Energy Committee v. City of Woodland* (2014) 225 Cal.App.4th 173, 210-211 ("Although the Building Code applies to all nonresidential buildings, it does not extend beyond the buildings themselves. It addresses the building's envelope, exterior lighting, and signage").

Further, bare conclusions or opinions of the agency are not sufficient to satisfy an agency's obligation under CEQA to support its environmental findings. *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 403-04 ("To facilitate CEQA's informational role, the EIR must contain facts and analysis, not just the agency's bare conclusions or opinions. . . . [to] enable[] the decision-makers and the public to make an 'independent, reasoned judgment' about a proposed project."); accord *Concerned Citizens of Costa Mesa, Inc. v. 32nd Dist. Agricultural Assn.* (1986) 42 Cal.3d 929, 935 (quoting *Santiago Cnty. Water Dist. v. Cnty. of Orange* (1981) 118 Cal.App.3d 818, 831).

Second and similarly, the SCEA unlawfully fails to incorporate feasible mitigation measures simply on the basis that the SCEA did not identify a potentially significant impact. For example, for PMM AES-1, the SCEA concludes that the Mitigation Measures is not applicable and finds that the "proposed project's aesthetic impacts shall not be considered significant impacts on the

environment pursuant to PRC § 21099." Similarly, for Mitigation Measure PMM AQ-1, the SCEA states that upon compliance with the South Coast Air Quality Management District (SCAQMD), the Mitigation Measure's requirements would be satisfied and concludes that because the impacts on Air Quality were found to be less than significant, the Mitigation Measure is not required.

The Project is required to incorporate all of SCAG's feasible mitigation measures, regardless of whether the SCEA itself identifies a potentially significant impact. Public Resources Code section 21155.2(a) is unambiguous in stating that transit priority projects must incorporate "all feasible mitigation measures, performance standards or criteria set forth in prior environmental impact reports," irrespective of whether the SCEA finds a less than significant impact. The SCEA fails to address the feasibility of measures not incorporated into the Project, and thus fails to meet the requirements of Public Resources Code section 21155.2.

Section 21155.2 of the Cal. Public Resources Code requires that a TPP incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable environmental impact reports. However, the Project's SCEA fails to incorporate many applicable mitigation measures identified in the 2016-2040 RTP/SCS, 2020-2045 RTP/SCS ("RTP/SCS Plans") and their respective EIRs without making a feasibility determination.

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[13] SCAG (Sept. 3, 2020) A Resolution of the Southern California Association of Governments (SCAG) Adopting the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal) Program Environmental Impact Report (PEIR) Addendum and Approving Connect SoCal in its Entirety, Exhibit A, "Revised Mitigation Monitoring and Reporting Program, available at https://scag.ca.gov/sites/main/files/fileattachments/exhibit-a_connectsocal_peir_revisedmmrp.pdf?1606004474 at pp. 2 – 52.

RESPONSE TO COMMENT 2A-7

The commenter states the Project does not qualify for a SCEA because the City did not require implementation of all feasible mitigation measures from the 2020–2045 RTP/SCS EIR. Per CEQA Guidelines Section 15126.4(a)(3), mitigation measures are not required for effects, which are not found to be significant. PRC Section 21155.2 does not alter this fundamental CEQA principle. As such, "all feasible mitigation measures" must be read in conjunction with CEQA Guidelines Section 15126.4(a)(3). Thus, a TPP reviewed in a SCEA need only adopt mitigation measures from program EIRs for impacts determined to be significant. The commenter cites no authority that PRC Section 21155.2 should be applied contrary to CEQA Guidelines Section 15126.4(a)(3). Here, Air Quality impacts were determined to be less than significant with implementation of regulatory compliance measures (RCMs); therefore, no mitigation is required.

The City is not required to impose mitigation measures where there is a less-than-significant impact.[15] Moreover, the Mitigation Monitoring and Reporting Program for the Connect SoCal PEIR (SCAG MMRP) does not include project-level mitigation measures that are required of the Project. The SCAG MMRP instead provides a list of mitigation measures that a lead agency can and should consider, as applicable and feasible, where the agency has identified that a project has the potential for significant effects. The SCEA included a discussion of the mitigation measures applicable to the Project contained within Table 3.3 on page 73 of the SCEA. It identified regulations that apply and, therefore, supersede the identified mitigation measure, and, where the Project may result in a potentially significant impact, the SCEA identified the applicable mitigation. While these mitigation measures may not be verbatim of the mitigation measure adopted by SCAG, they incorporate the salient elements of those measures, where feasible, and otherwise offer Project-specific recommendations to reduce potential impacts to less than significant. Thus, contrary to commenter's statement, substantial evidence supports the finding that the Project incorporated all feasible mitigation measures, performance standards or criteria set forth in the 2020-2045 RTP/SCS PEIR and Addendum.

COMMENT 2A-8

This includes the following identified mitigation measures, among others:

- 2016-2040 RTP/SCS[14]
  - MM-AES-1(b)
    - Use a palette of colors, textures, building materials that are graffiti-resistant, and/or plant materials that complement the surrounding landscape and development.
    - Use contour grading to better match surrounding terrain. Contour edges of major cut-and-fill to provide a more natural looking finished profile.
    - Use alternating facades to "break up" large facades and provide visual interest.
    - Design new corridor landscaping to respect existing natural and man-made features and to complement the dominant landscaping of the surrounding areas.
    - Replace and renew landscaping along corridors with road widenings, interchange projects, and related improvements.
    - Retain or replace trees bordering highways, so that clear-cutting is not evident.
    - Provide new corridor landscaping that respects and provides appropriate transition to existing natural and man-made features and is complementary to the dominant landscaping or native habitats of surrounding areas.
    - Implement design guidelines, local policies, and programs aimed at protecting views of scenic corridors and avoiding visual intrusions in design of projects to minimize contrasts in scale and massing between the project and surrounding natural forms and developments. Avoid, if possible, large cuts and fills when the

[15] Applicable case law prohibits the imposition of mitigation measures unless they have a nexus to and are proportional to a project's significant impacts. (*Nollan v. California Coastal Comm.* (1987) 483 U.S. 825; *Dolan v. City of Tigard* (1994) 512 U.S. 374.) Absent a nexus to a significant impact, mitigation is legally infeasible; here, the impact of concern (air quality) is not significant.

visual environment (natural or urban) would be substantially disrupted. Site or design of projects should minimize their intrusion into important viewsheds and use contour grading to better match surrounding terrain.

- MM-AES-3(b)
  - Minimize contrasts in scale and massing between the projects and surrounding natural forms and development, minimize their intrusion into important viewsheds, and use contour grading to better match surrounding terrain in accordance with county and city hillside ordinances, where applicable.
  - Design landscaping along highway corridors to add significant natural elements and visual interest to soften the hard-edged, linear transportation corridors.
  - Require development of design guidelines for projects that make elements of proposed buildings/facilities visually compatible, or minimize visibility of changes in visual quality or character through use of hardscape and softscape solutions. Specific measures to be addressed include setback buffers, landscaping, color, texture, signage, and lighting criteria.
  - Design projects consistent with design guidelines of applicable general plans.
  - Apply development standards and guidelines to maintain compatibility with surrounding natural areas, including site coverage, building height and massing, building materials and color, landscaping, site grading, and so forth in accordance with general plans and adopted design guidelines, where applicable.
  - Require that sites are kept in a blight/nuisance-free condition. Remove blight or nuisances that compromise visual character or visual quality of project areas including graffiti abatement, trash removal, landscape management, maintenance of signage and billboards in good condition, and replace compromised native
  - vegetation and landscape
- MM-AES-4(b)
  - Use lighting fixtures that are adequately shielded to a point below the light bulb and reflector and that prevent unnecessary glare onto adjacent properties.
  - Restrict the operation of outdoor lighting for construction and operation activities in accordance with local regulations.
  - Use high pressure sodium and/or cut-off fixtures instead of typical mercury-vapor fixtures for outdoor lighting.
  - Use unidirectional lighting to avoid light trespass onto adjacent properties.
  - Design exterior lighting to confine illumination to the project site, and/or to areas which do not include light-sensitive uses.
  - Provide structural and/or vegetative screening from light-sensitive uses.
  - Shield and direct all new street and pedestrian lighting away from light-sensitive off-site uses.
  - Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces.
  - Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties.

- MM-AF-1(b):
  - For projects that require approval or funding by the USDOT, comply with Section 4(f) U.S. Department of Transportation Act of 1966 (USDOT Act).
  - Project relocation or corridor realignment to avoid Prime Farmland, Unique Farmland, or Farmland of Local or Statewide Importance.
  - Maintain and expand agricultural land protections such as urban growth boundaries.
  - Support the acquisition or voluntary dedication of agriculture conservation easements and other programs that preserve agricultural lands, including the creation of farmland mitigation banks.
  - Provide for mitigation fees to support a mitigation bank that invests in farmer education, agricultural infrastructure, water supply, marketing, etc. that enhance the commercial viability of retained agricultural lands.
  - Include underpasses and overpasses at reasonable intervals to maintain property access.
  - Use berms, buffer zones, setbacks, and fencing to reduce conflicts between new development and farming uses and protect the functions of farmland.
  - Ensure individual projects are consistent with federal, state, and local policies that preserve agricultural lands and support the economic viability of agricultural activities, as well as policies that provide compensation for property owners if preservation is not feasible.
  - Contact the California Department of Conservation and each county's Agricultural Commissioner's office to identify the location of prime farmlands and lands that support crops considered valuable to the local or regional economy and evaluate potential impacts to such lands using the land evaluation and site assessment (LESA) analysis method (CEQA Guidelines §21095), as appropriate. Use conservation easements or the payment of in-lieu fees to offset impacts.
- MM-AF-2(b):
  - Project relocation or corridor realignment to avoid lands in Williamson Act contracts.
  - Establish conservation easements consistent with the recommendations of the Department of Conservation, or 20-year Farmland Security Zone contracts (Government Code Section 51296 et seq.), 10-year Williamson Act contracts (Government Code Section 51200 et seq.), or use of other conservation tools available from the California Department of Conservation Division of Land Resource Protection.
  - Prior to final approval of each project, encourage enrollments of agricultural lands for counties that have Williamson Act programs, where applicable.
- MM-AIR-2(b):
  - Minimize land disturbance.
  - Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas.

- Suspend grading and earth moving when wind gusts exceed 25 miles per hour unless the soil is wet enough to prevent dust plumes.
- Cover trucks when hauling dirt.
- Stabilize the surface of dirt piles if not removed immediately.
- Limit vehicular paths on unpaved surfaces and stabilize any temporary roads.
- Minimize unnecessary vehicular and machinery activities.
- Revegetate disturbed land, including vehicular paths created during construction to avoid future off-road vehicular activities.
- On Caltrans projects, Caltrans Standard Specifications 10-Dust Control, 17-Watering, and 18-Dust Palliative shall be incorporated into project specifications.
- Require contractors to assemble a comprehensive inventory list (i.e., make, model, engine year, horsepower, emission rates) of all heavy-duty off-road (portable and mobile) equipment (50 horsepower and greater) that could be used an aggregate of 40 or more hours for the construction project. Prepare a plan for approval by the applicable air district demonstrating achievement of the applicable percent reduction for a CARB-approved fleet.
- Ensure that all construction equipment is properly tuned and maintained.
- Provide an operational water truck on-site at all times. Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas. Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway.
- Project sponsors should ensure to the extent possible that construction activities utilize grid-based electricity and/or onsite renewable electricity generation rather than diesel and/or gasoline powered generators.
- Develop a traffic plan to minimize traffic flow interference from construction activities. The plan may include advance public notice of routing, use of public transportation, and satellite parking areas with a shuttle service. Schedule operations affecting traffic for off-peak hours. Minimize obstruction of through-traffic lanes. Provide a flag person to guide traffic properly and ensure safety at construction sites.
- As appropriate, require that portable engines and portable engine-driven equipment units used at the project work site, with the exception of on-road and off-road motor vehicles, obtain CARB Portable Equipment Registration with the state or a local district permit. Arrange appropriate consultations with the CARB or the District to determine registration and permitting requirements prior to equipment operation at the site.
- Implement EPA’s National Clean Diesel Program.
- Diesel- or gasoline-powered equipment shall be replaced by lowest emitting feasible for each piece of equipment from among these options: electric equipment whenever feasible, gasoline-powered equipment if electric infeasible.
- On-site electricity shall be used in all construction areas that are demonstrated to be served by electricity.

- If cranes are required for construction, they shall be rated at 200 hp or greater equipped with Tier 4 or equivalent engines.
- Use alternative diesel fuels, such as Clean Fuels Technology (water emulsified diesel fuel) or O2 diesel ethanol-diesel fuel (O2 Diesel) in existing engines
- Convert part of the construction truck fleet to natural gas.
- Include “clean construction equipment fleet”, defined as a fleet mix cleaner than the state average, in all construction contracts.
- Fuel all off-road and portable diesel powered equipment with ARB-certified motor vehicle diesel fuel (non-taxed version suitable for use off-road).
- Use electric fleet or alternative fueled vehicles where feasible including methanol, propane, and compressed natural gas.
- Use diesel construction equipment meeting ARB’s Tier 4 certified engines or cleaner off-road heavy-duty diesel engines and comply with State off-road regulation.
- Use on-road, heavy-duty trucks that meet the ARB’s 2007 or cleaner certification standard for on-road diesel engines, and comply with the State on-road regulation.
- Use idle reduction technology, defined as a device that is installed on the vehicle that automatically reduces main engine idling and/or is designed to provide services, e.g., heat, air conditioning, and/or electricity to the vehicle or equipment that would otherwise require the operation of the main drive engine while the vehicle or equipment is temporarily parked or is stationary.
- Minimize idling time either by shutting off equipment when not in use or limit idling time to 3 minutes Signs shall be posted in the designated queuing areas and/or job sites to remind drivers and operators of the 3 minute idling limit. The construction contractor shall maintain a written idling policy and distribute it to all employees and subcontractors. The on-site construction manager shall enforce this limit.
- Prohibit diesel idling within 1,000 feet of sensitive receptors.
- Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors.
- The number of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time.
- The engine size of construction equipment shall be the minimum practical size.
- Catalytic converters shall be installed on gasoline-powered equipment.
- Signs shall be posted in designated queuing areas and job sites to remind drivers and operators of the idling limit.
- Construction worker trips shall be minimized by providing options for carpooling and by providing for lunch onsite.
- Use new or rebuilt equipment.

- Maintain all construction equipment in proper working order, according to manufacturer's specifications. The equipment must be check by an ASE-certified mechanic and determined to be running in proper condition before it is operated.
- Use low rolling resistance tires on long haul class 8 tractor-trailers.
- Suspend all construction activities that generate air pollutant emissions during air alerts.
- Install a CARB-verified, Level 3 emission control device, e.g., diesel particulate filters, on all diesel engines.

- MM-BIO-1(b):
  - Require project design to avoid occupied habitat, potentially suitable habitat, and designated critical habitat, wherever practicable and feasible.
  - Where avoidance is determined to be infeasible, provide conservation measures to fulfill the requirements of the applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal Endangered Species Act or Section 2081 of the California Endangered Species Act to support issuance of an Incidental take permit. A wide variety of conservation strategies have been successfully used in the SCAG region to protect the survival and recovery in the wild of federally and state-listed endangered species including the bald eagle:
    - Avoidance strategies
    - Contribution of in-lieu fees
    - Use of mitigation bank credits
    - Funding of research and recovery efforts
    - Habitat restoration
    - Conservation easements
    - Permanent dedication of habitat
    - Other comparable measures
  - Design projects to avoid desert native plants, salvage and relocate desert native plants, and/or pay in lieu fees to support off-site long-term conservation strategies.
  - Develop and implement a Worker Awareness Program (environmental education) to inform project workers of their responsibilities in regards to avoiding and minimizing impacts on sensitive biological resources.
  - Appoint an Environmental Inspector to monitor implementation of mitigation measures.
  - Schedule construction activities to avoid sensitive times for biological resources (e.g., steelhead spawning periods during the winter and spring, nesting bird season) and to avoid the rainy season when erosion and sediment transport is increased.
  - Conduct pre-construction monitoring to delineate occupied sensitive species' habitat to facilitate avoidance.
  - Where projects are determined to be within suitable habitat of listed or sensitive species that have specific field survey protocols or guidelines outlined by the USFWS, CDFW, or other local agency, conduct preconstruction surveys that follow

applicable protocols and guidelines and are conducted by qualified and/or certified personnel.

- MM-BIO-2(b):
  - Consult with the USFWS and NMFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal Endangered Species Act.
  - Consult with the USFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal Endangered Species Act and any additional species afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-county area: Angeles, Cleveland, Los Padres, and San Bernardino.
  - Consult with the CDFW where such state-designated sensitive or riparian habitats provide potential or occupied habitat for state-listed rare, threatened, and endangered species afforded protection pursuant to the California Endangered Species Act, or Fully-Protected Species afforded protection pursuant to the State Fish and Game Code.
  - Consult with the CDFW pursuant to the provisions of Section 1600 of the State Fish and Game Code as they relate to lakes and streambeds.
  - Consult with the USFWS, USFS, CDFW, and counties and cities in the SCAG region, where state-designated sensitive or riparian habitats are occupied by birds afforded protection pursuant to the Migratory Bird Treaty Act during the breeding season.
  - Consult with the CDFW for state-designated sensitive or riparian habitats where fur-bearing mammals, afforded protection pursuant to the provisions of the State Fish and Game Code for fur-beaming mammals, are actively using the areas in conjunction with breeding activities.
  - Utilize applicable and CDFW approved plant community classification resources during delineation of sensitive communities and invasive plants including, but not limited to, the Manual of California Vegetation, the California Invasive Plant Inventory Database, and the Orange County California Native Plant Society (OCCNPS) Emergent Invasive Plant Management Program, where appropriate.
  - Encourage project design to avoid sensitive natural communities and riparian habitats, wherever practicable and feasible. Where avoidance is determined to be infeasible, develop sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) to protect sensitive natural communities and riparian habitats.
  - Install fencing and/or mark sensitive habitat to be avoided during construction activities.

- Salvage and stockpile topsoil (the surface material from 6 to 12 inches deep) and perennial plants for use in restoring native vegetation to all areas of temporary disturbance within the project area.
- Revegetate with appropriate native vegetation following the completion of construction activities.
- Complete habitat enhancement (e.g., through removal of nonnative invasive wetland species and replacement with more ecologically valuable native species).
- Use Best Management Practices (BMPs) at construction sites to minimize erosion and sediment transport from the area. BMPs include encouraging growth of vegetation in disturbed areas, using straw bales or other silt-catching devices, and using settling basins to minimize soil transport.

- MM-BIO-3(b)
  - Require project design to avoid federally protected wetlands consistent with the provisions of Section 404 of the Clean Water Act, wherever practicable and feasible.
  - Where the Lead Agency has identified that a project, or other regionally significant project, has the potential to impact other wetlands or waters not protected under Section 404 of the Clean Water Act, seek comparable coverage for these wetlands and waters in consultation with the USACOE and applicable Regional Water Quality Control Boards (RWQCB).
  - Where avoidance is determined to be infeasible, develop sufficient conservation measures to fulfill the requirements of the applicable authorization for impacts to federally protected wetlands to support issuance of a permit under Section 404 of the Clean Water Act as administered by the USACOE. The use of an authorized Nationwide Permit or issuance of an individual permit requires the project applicant to demonstrate compliance with the USACOE's Final Compensatory Mitigation Rule. The USACOE reviews projects to ensure environmental impacts to aquatic resources are avoided or minimized as much as possible. Consistent with the administration's performance standard of "no net loss of wetlands" a USACOE permit may require a project proponent to restore, establish, enhance or preserve other aquatic resources in order to replace those affected by the proposed project. This compensatory mitigation process seeks to replace the loss of existing aquatic resource functions and area. Project proponents required to complete mitigation are encouraged to use a watershed approach and watershed planning information. The new rule establishes performance standards, sets timeframes for decision making, and to the extent possible, establishes equivalent requirements and standards for the three sources of compensatory mitigation:
    - Permittee-responsible mitigation
    - Contribution of in-lieu fees
    - Use of mitigation bank credits

- Require review of construction drawings by a certified wetland delineator as part of each project-specific environmental analysis to determine whether wetlands will be affected and, if necessary, perform a formal wetland delineation.

- MM-BIO-4(b):
  - Consult with the USFWS, USFS, CDFW, and counties and cities in the SCAG region, where impacts to birds afforded protection pursuant to the Migratory Bird Treaty Act during the breeding season may occur.
  - Consult with the USFS where impacts to migratory wildlife corridors may occur in an area afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-County area: Angeles, Cleveland, Los Padres, and San Bernardino.
  - Consult with counties, cities, and other local organizations when impacts may occur to open space areas that have been designated as important for wildlife movement.
  - Prohibit construction activities within 500 feet of occupied breeding areas for wildlife afforded protection pursuant to Title 14 § 460 of the California Code of Regulations protecting fur-bearing mammals, during the breeding season.
  - Prohibit clearing of vegetation and construction within the peak avian breeding season (February 1st through September 1st), where feasible.
  - Conduct weekly surveys to identify active raptor and other migratory nongame bird nests by a qualified biologist with experience in conducting breeding bird surveys within three days prior to the work in the area from February 1 through August 31.
  - Prohibit construction activities with 300 feet (500 feet for raptors) of occupied nests of birds afforded protection pursuant to the Migratory Bird Treaty Act, during the breeding season. Delineate the non-disturbance buffer by temporary fencing and keep the buffer in place until construction is complete or the nest is no longer active. No construction shall occur within the fenced nest zone until the young have fledged, are no longer being fed by the parents, have left the nest, and will no longer be impacted by the project. Reductions or expansions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.
  - Ensure that suitable nesting sites for migratory nongame native bird species protected under the Migratory Bird Treaty Act and/or trees with unoccupied raptor nests should only be removed prior to February 1, or following the nesting season.
  - Conduct site-specific analyses of opportunities to preserve or improve habitat linkages with areas on- and off-site. Analyze habitat linkages/wildlife movement corridors on a broader and cumulative impact analysis scale to avoid adverse impacts from linear projects that have potential for impacts on a broader scale or critical narrow choke points that could reduce function of recognized movement corridors on a larger scale. Require review of construction drawings and habitat

connectivity mapping provided by the CDFW or CNDDB by a qualified biologist to determine the risk of habitat fragmentation.

- Pursue mitigation banking to preserve habitat linkages and corridors (opportunities to purchase, maintain, and/or restore offsite habitat).
- Demonstrate that proposed projects would not adversely affect movement of any native resident or migratory fish or wildlife species, wildlife movement corridors, or wildlife nursery sites through the incorporation of avoidance strategies into project design, wherever practicable and feasible.
- Evaluate the potential for overpasses, underpasses, and culverts in cases where a roadway or other transportation project may interrupt the flow of species through their habitat. Provide wildlife crossings in accordance with proven standards, such as FHWA's Critter Crossings or Ventura County Mitigation Guidelines and in consultation with wildlife corridor authorities with sufficient knowledge of both regional and local wildlife corridors, and at locations useful and appropriate for the species of concern.
- Install wildlife fencing where appropriate to minimize the probability of wildlife injury due to direct interaction between wildlife and roads or construction.
- Establish native vegetation and facilitate the enhancement and maintenance of biological diversity within existing habitat pockets in urban environments that provide connectivity to large-scale habitat areas.
- Where avoidance is determined to be infeasible, design sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) and in accordance with the respective counties and cities general plans to establish plans to mitigate for the loss of fish and wildlife movement corridors and/or wildlife nursery sites. The consideration of conservation measures may include the following measures, in addition to the measures outlined in MM-BIO-1(b), where applicable:
  - Wildlife movement buffer zones
  - Corridor realignment
  - Appropriately spaced breaks in center barriers
  - Stream rerouting
  - Culverts
  - Creation of artificial movement corridors such as freeway under- or overpasses
  - Other comparable measures
- Where the Lead Agency has identified that a RTP/SCS project, or other regionally significant project, has the potential to impact other open space or nursery site areas, seek comparable coverage for these areas in consultation with the USFWS, CDFW, NMFS, or other local jurisdictions.
- Project sponsors should emphasize that urban habitats and the plant and wildlife species they support are indeed valuable, despite the fact they are located in urbanized (previously disturbed) areas. Established habitat connectivity and wildlife corridors in these urban ecosystems will likely be impacted with further

urbanization, as proposed in the Project. Appropriate mitigation measures should be proposed, developed, and implemented in these sensitive urban microhabitats to support or enhance the rich diversity of urban plant and wildlife species.

- Establish native vegetation within habitat pockets or the "wildling of urbanized habitats" that facilitate the enhancement and maintenance of biological diversity in these areas. These habitat pockets, as the hopscotch across an urban environment, provide connectivity to large-scale habitat areas.

- MM-BIO-5(b):
  - Consult with the appropriate local agency responsible for the administration of the policy or ordinance protecting biological resources.
  - Prioritize retention of trees on-site consistent with local regulations. Provide adequate protection during the construction period for any trees that are to remain standing, as recommended by a certified arborist.
  - If specific project area trees are designated as "Protected Trees," "Landmark Trees," or "Heritage Trees," obtain approval for encroachment or removals through the appropriate entity, and develop appropriate mitigation measures at that time, to ensure that the trees are replaced. Mitigation trees shall be locally collected native species.
  - Before the start of any clearing, excavation, construction or other work on the site, securely fence off every protected tree deemed to be potentially endangered by said site work. Keep such fences in place for duration of all such work. Clearly mark all trees to be removed. Establish a scheme for the removal and disposal of logs, brush, earth and other debris that will avoid injury to any protected tree.
  - Where proposed development or other site work could encroach upon the protected perimeter of any protected tree, incorporate special measures to allow the roots to breathe and obtain water and nutrients. Minimize any excavation, cutting, filing, or compaction of the existing ground surface within the protected perimeter. Require that no change in existing ground level occur from the base of any protected tree at any time. Require that no burning or use of equipment with an open flame occur near or within the protected perimeter of any protected tree.
  - Require that no storage or dumping of oil, gas, chemicals, or other substances that may be harmful to trees occur from the base of any protected trees, or any other location on the site from which such substances might enter the protected perimeter. Require that no heavy construction equipment or construction materials be operated or stored within a distance from the base of any protected trees. Require that wires, ropes, or other devices not be attached to any protected tree, except as needed for support of the tree. Require that no sign, other than a tag showing the botanical classification, be attached to any protected tree.
  - Thoroughly spray the leaves of protected trees with water periodically during construction to prevent buildup of dust and other pollution that would inhibit leaf transpiration.

- If any damage to a protected tree should occur during or as a result of work on the site, the appropriate local agency will be immediately notified of such damage. If, such tree cannot be preserved in a healthy state, require replacement of any tree removed with another tree or trees on the same site deemed adequate by the local agency to compensate for the loss of the tree that is removed.
- Remove all debris created as a result of any tree removal work from the property within two weeks of debris creation, and such debris shall be properly disposed of in accordance with all applicable laws, ordinances, and regulations.
- Design projects to avoid conflicts with local policies and ordinances protecting biological resources.
- Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the applicable policy or ordinance shall be developed, such as to support issuance of a tree removal permit. The consideration of conservation measures may include:
  - Avoidance strategies
  - Contribution of in-lieu fees
  - Planting of replacement trees at a minimum ratio of 2:1
  - Re-landscaping areas with native vegetation post-construction
  - Other comparable measures

- MM-BIO-6(b):
  - Consult with the appropriate federal, state, and/or local agency responsible for the administration of HCPs, NCCPs or other conservation programs.
  - Wherever practicable and feasible, the project shall be designed to avoid through project design lands preserved under the conditions of an HCP, NCCP, or other conservation program.
  - Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the HCP and/or NCCP or other conservation program, which would include but not be limited to applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal Endangered Species Act or Section 2081 of the California Endangered Species Act, shall be developed to support issuance of an Incidental take permit or any other permissions required for development within the HCP/NCCP boundaries. The consideration of additional conservation measures would include the measures outlined in MM-BIO-1(b), where applicable.
  - MM-CUL-1(b):
  - Obtain review by a qualified geologist or paleontologist to determine if the project has the potential to require excavation or blasting of parent material with a moderate to high potential to contain unique paleontological or resources, or to require the substantial alteration of a unique geologic feature.
  - Avoid exposure or displacement of parent material with a moderate to high potential to yield unique paleontological resources.

- Where avoidance of parent material with a moderate to high potential to yield unique paleontological resources is not feasible:
- All on-site construction personnel receive Worker Education and Awareness Program (WEAP) training to understand the regulatory framework that provides for protection of paleontological resources and become familiar with diagnostic characteristics of the materials with the potential to be encountered.
- Prepare a Paleontological Resource Management Plan (PRMP) to guide the salvage, documentation and repository of representative samples of unique paleontological resources encountered during construction. If unique paleontological resources are encountered during excavation or blasting, use a qualified paleontologist to oversee the implementation of the PRMP.
- Monitor blasting and earth-moving activities in parent material, with a moderate to high potential to yield unique paleontological resources using a qualified paleontologist or archeologists cross-trained in paleontology to determine if unique paleontological resources are encountered during such activities, consistent with the specified or comparable protocols.
- Identify where excavation and earthmoving activity is proposed in a geologic unit having a moderate or high potential for containing fossils and specify the need for a paleontological or archeological (cross-trained in paleontology) to be present during earth-moving activities or blasting in these areas.
- Avoid routes and project designs that would permanently alter unique features with archaeological and/or paleontological significance.
- Salvage and document adversely affected resources sufficient to support ongoing scientific research and education.

- MM-CUL-2(b):
  - Pursuant to CEQA Guidelines Section 15064.5, conduct a record search at the appropriate Information Center to determine whether the project area has been previously surveyed and whether historic resources were identified.
  - Obtain a qualified architectural historian to conduct historic architectural surveys as recommended by the Information Center. In the event the records indicate that no previous survey has been conducted, the Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for historical resources within 1,000 feet of the project.
  - Comply with Section 106 of the National Historic Preservation Act including, but not limited to, projects for which federal funding or approval is required for the individual project. This law requires federal agencies to evaluate the impact of their actions on resources included in or eligible for listing in the National Register. Federal agencies must coordinate with the State Historic Preservation Officer in evaluating impacts and developing mitigation. These mitigation measures may include, but are not limited to the following:
  - Employ design measures to avoid historical resources and undertake adaptive reuse where appropriate and feasible. If resources are to be preserved, as

feasible, carry out the maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction in a manner consistent with the Secretary of the Interior's Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings. If resources would be impacted, impacts should be minimized to the extent feasible.

- Where feasible, noise buffers/walls and/or visual buffers/landscaping should be constructed to preserve the contextual setting of significant built resources.
- Secure a qualified environmental agency and/or architectural historian, or other such qualified person to document any significant historical resource(s), by way of historic narrative, photographs, and architectural drawings, as mitigation for the effects of demolition of a resource.
- Consult with the Native American Heritage Commission to determine whether known sacred sites are in the project area, and identify the Native American(s) to contact to obtain information about the project site.
- Prior to construction activities, obtain a qualified archaeologist to conduct a record search at the appropriate Information Center of the California Archaeological Inventory to determine whether the project area has been previously surveyed and whether resources were identified.
- Prior to construction activities, obtain a qualified archaeologist or architectural historian (depending on applicability) to conduct archaeological and/or historic architectural surveys as recommended by the Information Center. In the event the records indicate that no previous survey has been conducted, the Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for archaeological resources.
- If a record search indicates that the project is located in an area rich with cultural materials, retain a qualified archaeologist to monitor any subsurface operations, including but not limited to grading, excavation, trenching, or removal of existing features of the subject property.
- Conduct construction activities and excavation to avoid cultural resources (if identified). If avoidance is not feasible, further work may be needed to determine the importance of a resource. Retain a qualified archaeologist familiar with the local archaeology, and/or as appropriate, an architectural historian who should make recommendations regarding the work necessary to determine importance. If the cultural resource is determined to be important under state or federal guidelines, impacts on the cultural resource will need to be mitigated.
- Stop construction activities and excavation in the area where cultural resources are found until a qualified archaeologist can determine the importance of these resources

- MM-CUL-4(b):
  - In the event of discovery or recognition of any human remains during construction or excavation activities associated with the project, in any location other than a dedicated cemetery, cease further excavation or disturbance of the site or any

nearby area reasonably suspected to overlie adjacent human remains until the coroner of the county in which the remains are discovered has been informed and has determined that no investigation of the cause of death is required.

- If any discovered remains are of Native American origin:
- Contact the County Coroner to contact the Native American Heritage Commission to ascertain the proper descendants from the deceased individual. The coroner should make a recommendation to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods. This may include obtaining a qualified archaeologist or team of archaeologists to properly excavate the human remains.
- If the Native American Heritage Commission is unable to identify a descendant, or the descendant failed to make a recommendation within 24 hours after being notified by the commission, obtain a Native American monitor, and an archaeologist, if recommended by the Native American monitor, and rebury the Native American human remains and any associated grave goods, with appropriate dignity, on the property and in a location that is not subject to further subsurface disturbance where the following conditions occur:
- The Native American Heritage Commission is unable to identify a descendent;
- The descendant identified fails to make a recommendation; or
- The landowner or their authorized representative rejects the recommendation of the descendant, and the mediation by the NAHC fails to provide measures acceptable to the landowner.

- MM-EN-2(b):
  - Integrate green building measures consistent with CALGreen (California Building Code Title 24) into project design including:
  - Use energy efficient materials in building design, construction, rehabilitation, and retrofit.
  - Install energy-efficient lighting, heating, and cooling systems (cogeneration); water heaters; appliances; equipment; and control systems.
  - Reduce lighting, heating, and cooling needs by taking advantage of light colored roofs, trees for shade, and sunlight.
  - Incorporate passive environmental control systems that account for the characteristics of the natural environment.
  - Use high-efficiency lighting and cooking devices. o Incorporate passive solar design.
  - Use high-reflectivity building materials and multiple glazing.
  - Prohibit gas-powered landscape maintenance equipment.
  - Install electric vehicle charging stations.
  - Reduce wood burning stoves or fireplaces.
  - Provide bike lanes accessibility and parking at residential developments.
- MM-GEO-1(b):

- Consistent with Section 4.7.2 of the Alquist-Priolo Earthquake Fault Zoning Act, conduct a geologic investigation to demonstrate that proposed buildings would not be constructed across active faults. An evaluation and written report of a specific site can and should be prepared by a licensed geologist. If an active fault is found and unfit for human occupancy over the fault, place a setback of 50 feet from the fault.
- Use site-specific fault identification investigations conducted by licensed geotechnical professionals in accordance with the requirements of the Alquist-Priolo Act, as well as any applicable Caltrans regulations that exceed or reasonably replace the requirements of the Act to either determine that the anticipated risk to people and property is at or below acceptable levels or site-specific measures have been incorporated into the project design, consistent with the CBC and UBC.
- Ensure that projects located within or across Alquist-Priolo Zones comply with design requirements provided in Special Publication 117, published by the California Geological Survey, as well as relevant local, regional, state, and federal design criteria for construction in seismic areas.
- Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that projects are designed in accordance with county and city code requirements for seismic ground shaking. With respect to design, consider seismicity of the site, soil response at the site, and dynamic characteristics of the structure, in compliance with the appropriate California Building Code and State of California design standards for construction in or near fault zones, as well as all standard design, grading, and construction practices in order to avoid or reduce geologic hazards.
- Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that site-specific geotechnical investigations conducted by a qualified geotechnical expert be required prior to preparation of project designs. These investigations shall identify areas of potential expansive soils and recommend remedial geotechnical measures to eliminate any problems. Recommended corrective measures, such as structural reinforcement and replacing soil with engineered fill, shall be implemented in project designs. Geotechnical investigations identify areas of potential failure and recommend remedial geotechnical measures to eliminate any problems.
- Adhere to design standards described in the CBC and all standard geotechnical investigation, design, grading, and construction practices to avoid or reduce impacts from earthquakes, ground shaking, ground failure, and landslides.
- Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, design projects to avoid geologic units or soils that are unstable, expansive soils and soils prone to lateral spreading, subsidence, liquefaction, or collapse wherever feasible.

- MM-GEO-2(b):

- Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that site-specific geotechnical investigations conducted by a qualified geotechnical expert are conducted to ascertain soil types prior to preparation of project designs. These investigations can and should identify areas of potential failure and recommend remedial geotechnical measures to eliminate any problems.
- Consistent with the requirements of the State Water Resources Control Board (SWRCB) for projects over one acre in size, obtain coverage under the General Construction Activity Storm Water Permit (General Construction Permit) issued by the SWRCB and conduct the following:
- File a Notice of Intent (NOI) with the SWRCB.
- Prepare a stormwater pollution prevention plan (SWPPP) and submit the plan for review and approval by the Regional Water Quality Control Board (RWQCB). At a minimum, the SWPPP should include a description of construction materials, practices, and equipment storage and maintenance; a list of pollutants likely to contact stormwater; site-specific erosion and sedimentation control practices; a list of provisions to eliminate or reduce discharge of materials to stormwater; best management practices (BMPs); and an inspection and monitoring program.
- Submit to the RWQCB a copy of the SWPPP and evidence of submittal of the NOI to the SWRCB. Implementation of the SWPPP should start with the commencement of construction and continue through the completion of the project.
- After construction is completed, the project sponsor can and should submit a notice of termination to the SWRCB.
- Consistent with the requirements of the SWRCB and local regulatory agencies with oversight of development associated with the Plan, ensure that project designs provide adequate slope drainage and appropriate landscaping to minimize the occurrence of slope instability and erosion. Design features should include measures to reduce erosion caused by storm water. Road cuts should be designed to maximize the potential for revegetation.
- Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that, prior to preparing project designs, new and abandoned wells are identified within construction areas to ensure the stability of nearby soils.

- MM-GHG-3(b):
  - Measures in an adopted plan or mitigation program for the reduction of emissions that are required as part of the Lead Agency's decision.
  - Reduction in emissions resulting from a project through implementation of project features, project design, or other measures, such as those described in Appendix F of the State CEQA Guidelines.
  - Off-site measures to mitigate a project's emissions.

- Measures that consider incorporation of Best Available Control Technology (BACT) during design, construction and operation of projects to minimize GHG emissions, including but not limited to:
- Use energy and fuel efficient vehicles and equipment. Project proponents are encouraged to meet and exceed all EPA/NHTSA/CARB standards relating to fuel efficiency and emission reduction;
- Use alternative (non-petroleum based) fuels;
- Deployment of zero- and/or near zero emission technologies as defined by CARB;
- Use lighting systems that are energy efficient, such as LED technology;
- Use the minimum feasible amount of GHG-emitting construction materials that is feasible;
- Use cement blended with the maximum feasible amount of fly ash or other materials that reduce GHG emissions from cement production;
- Incorporate design measures to reduce GHG emissions from solid waste management through encouraging solid waste reduction, recycling, and reuse;
- Incorporate passive solar and other design measures to reduce energy consumption and increase production and use of renewable energy;
- Incorporate design measures like WaterSense fixtures and water capture to reduce water consumption;
- Use lighter-colored pavement where feasible;
- Recycle construction debris to maximum extent feasible;
- Protect and plant shade trees in or near construction projects where feasible; and
- Solicit bids that include concepts listed above.
- Measures that encourage transit use, carpooling, bike-share and car-share programs, active transportation, and parking strategies, including, but not limited to, transit-active transportation coordinated strategies, increased bicycle carrying capacity on transit and rail vehicles.
- Incorporating bicycle and pedestrian facilities into project designs, maintaining these facilities, and providing amenities incentivizing their use; providing adequate bicycle parking and planning for and building local bicycle projects that connect with the regional network.
- Improving transit access to rail and bus routes by incentives for construction of transit facilities within developments, and/or providing dedicated shuttle service to transit stations.
- Adopting employer trip reduction measures to reduce employee trips such as vanpool and carpool programs, providing end-of-trip facilities, and telecommuting programs.
- Designate a percentage of parking spaces for ride-sharing vehicles or high-occupancy vehicles, and provide adequate passenger loading and unloading for those vehicles.
- Land use siting and design measures that reduce GHG emissions, including:
- Developing on infill and brownfields sites;

- Building high density and mixed use developments near transit;
- Retaining on-site mature trees and vegetation, and planting new canopy trees;
- Measures that increase vehicle efficiency, encourage use of zero and low emissions vehicles, or reduce the carbon content of fuels, including constructing or encouraging construction of electric vehicle charging stations or neighborhood electric vehicle networks, or charging for electric bicycles; and
- Measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse.

- MM-HAZ-1(b):
  - Where the construction or operation of projects involves the transport of hazardous material, provide a written plan of proposed routes of travel demonstrating use of roadways designated for the transport of such materials.
  - Where the construction or operation of projects involves the transport of hazardous materials, avoid transport of such materials within one-quarter mile of schools, when school is in session, wherever feasible.
  - Where it is not feasible to avoid transport of hazardous materials, within one-quarter mile of schools on local streets, provide notification of the anticipated schedule of transport of such materials.
  - Specify the need for interim storage and disposal of hazardous materials to be undertaken consistent with applicable federal, state, and local statutes and regulations in the plans and specifications of the transportation improvement project.
  - Submit a Hazardous Materials Business/Operations Plan for review and approval by the appropriate local agency. Once approved, keep the plan on file with the Lead Agency (or other appropriate government agency) and update, as applicable. The purpose of the Hazardous Materials Business/Operations Plan is to ensure that employees are adequately trained to handle the materials and provides information to the local fire protection agency should emergency response be required. The Hazardous Materials Business/Operations Plan should include the following:
  - The types of hazardous materials or chemicals stored and/or used on-site, such as petroleum fuel products, lubricants, solvents, and cleaning fluids.
  - The location of such hazardous materials.
  - An emergency response plan including employee training information.
  - A plan that describes the manner in which these materials are handled, transported and disposed.
  - Specify the appropriate procedures for interim storage and disposal of hazardous materials, anticipated to be required in support of operations and maintenance activities, in conformance with applicable federal, state, and local statutes and regulations, in the Operations Manual for projects.
  - Follow manufacturer's recommendations on use, storage, and disposal of chemical products used in construction.

- Avoid overtopping construction equipment fuel gas tanks.
- During routine maintenance of construction equipment, properly contain and remove grease and oils.
- Properly dispose of discarded containers of fuels and other chemicals.
- MM-HAZ-4(b):
- Complete a Phase I Environmental Site Assessment, including a review and consideration of data from all known databases of contaminated sites, during the process of planning, environmental clearance, and construction for projects.
- Where warranted due to the known presence of contaminated materials, submit to the appropriate agency responsible for hazardous materials/wastes oversight a Phase II Environmental Site Assessment report if warranted by a Phase I report for the project site. The reports should make recommendations for remedial action, if appropriate, and be signed by a Registered Environmental Assessor, Professional Geologist, or Professional Engineer.
- Implement the recommendations provided in the Phase II Environmental Site Assessment report, where such a report was determined to be necessary for the construction or operation of the project, for remedial action.
- Submit a copy of all applicable documentation required by local, state, and federal environmental regulatory agencies, including but not limited to: permit applications, Phase I and II Environmental Site Assessments, human health and ecological risk assessments, remedial action plans, risk management plans, soil management plans, and groundwater management plans.
- Conduct soil sampling and chemical analyses of samples, consistent with the protocols established by the U.S. EPA to determine the extent of potential contamination beneath all underground storage tanks (USTs), elevator shafts, clarifiers, and subsurface hydraulic lifts when on-site demolition or construction activities would potentially affect a particular development or building.
- Consult with the appropriate local, state, and federal environmental regulatory agencies to ensure sufficient minimization of risk to human health and environmental resources, both during and after construction, posed by soil contamination, groundwater contamination, or other surface hazards including, but not limited to, underground storage tanks, fuel distribution lines, waste pits and sumps.
- Obtain and submit written evidence of approval for any remedial action if required by a local, state, or federal environmental regulatory agency.
- Cease work if soil, groundwater, or other environmental medium with suspected contamination is encountered unexpectedly during construction activities (e.g., identified by odor or visual staining, or if any underground storage tanks, abandoned drums, or other hazardous materials or wastes are encountered), in the vicinity of the suspect material. Secure the area as necessary and take all appropriate measures to protect human health and the environment, including but not limited to: notification of regulatory agencies and identification of the nature

and extent of contamination. Stop work in the areas affected until the measures have been implemented consistent with the guidance of the appropriate regulatory oversight authority.

- Use best management practices (BMPs) regarding potential soil and groundwater hazards.
- Soil generated by construction activities should be stockpiled onsite in a secure and safe manner. All contaminated soils determined to be hazardous or non-hazardous waste must be adequately profiled (sampled) prior to acceptable reuse or disposal at an appropriate off-site facility. Complete sampling and handling and transport procedures for reuse or disposal, in accordance with applicable local, state and federal laws and policies.
- Groundwater pumped from the subsurface should be contained on-site in a secure and safe manner, prior to treatment and disposal, to ensure environmental and health issues are resolved pursuant to applicable laws and policies. Utilize engineering controls, which include impermeable barriers to prohibit groundwater and vapor intrusion into the building.
- Prior to issuance of any demolition, grading, or building permit, submit for review and approval by the Lead Agency (or other appropriate government agency) written verification that the appropriate federal, state and/or local oversight authorities, including but not limited to the Regional Water Quality Control Board (RWQCB), have granted all required clearances and confirmed that the all applicable standards, regulations, and conditions have been met for previous contamination at the site.
- Develop, train, and implement appropriate worker awareness and protective measures to assure that worker and public exposure is minimized to an acceptable level and to prevent any further environmental contamination as a result of construction.
- If asbestos-containing materials (ACM) are found to be present in building materials to be removed, submit specifications signed by a certified asbestos consultant for the removal, encapsulation, or enclosure of the identified ACM in accordance with all applicable laws and regulations, including but not necessarily limited to: California Code of Regulations, Title 8; Business and Professions Code; Division 3; California Health and Safety Code Section 25915- 25919.7; and other local regulations.
- Where projects include the demolitions or modification of buildings constructed prior to 1968, complete an assessment for the potential presence or lack thereof of ACM, lead-based paint, and any other building materials or stored materials classified as hazardous waste by state or federal law.
- Where the remediation of lead-based paint has been determined to be required, provide specifications to the appropriate agency, signed by a certified Lead Supervisor, Project Monitor, or Project Designer for the stabilization and/or removal of the identified lead paint in accordance with all applicable laws and

regulations, including but not necessarily limited to: California Occupational Safety and Health Administration's (Cal OSHA's) Construction Lead Standard, Title 8 California Code of Regulations (CCR) Section 1532.1 and Department of Health Services (DHS) Regulation 17 CCR Sections 35001–36100, as may be amended. If other materials classified as hazardous waste by state or federal law are present, the project sponsor should submit written confirmation to the appropriate local agency that all state and federal laws and regulations should be followed when profiling, handling, treating, transporting, and/or disposing of such materials.

- Where a project site is determined to contain materials classified as hazardous waste by state or federal law are present, submit written confirmation to appropriate agency that all state and federal laws and regulations should be followed when profiling, handling, treating, transporting, and/or disposing of such materials.

- MM-HAZ-8(b):
  - Adhere to fire code requirements, including ignition-resistant construction with exterior walls of noncombustible or ignition resistant material from the surface of the ground to the roof system. Other fire-resistant measures would be applied to eaves, vents, windows, and doors to avoid any gaps that would allow intrusion by flame or embers.
  - Adhere to the Multi-Jurisdictional Hazards Mitigation Plan, as well as local general plans, including policies and programs aimed at reducing the risk of wildland fires through land use compatibility, training, sustainable development, brush management, and public outreach.
  - Encourage the use of fire-resistant vegetation native to Southern California and/or to the local microclimate (e.g., vegetation that has high moisture content, low growth habits, ignition-resistant foliage, or evergreen growth), eliminate brush and chaparral, and discourage the use of fire-promoting species especially non-native, invasive species (e.g., pampas grass, fennel, mustard, or the giant reed) in the immediate vicinity of development in areas with high fire threat.
  - Encourage natural revegetation or seeding with local, native species after a fire and discourage reseeding of non-native, invasive species to promote healthy, natural ecosystem regrowth. Native vegetation is more likely to have deep root systems that prevent slope failure and erosion of burned areas than shallow-rooted nonnatives.
  - Submit a fire safety plan (including phasing) to the Lead Agency and local fire agency for their review and approval. The fire safety plan shall include all of the fire safety features incorporated into the project and the schedule for implementation of the features. The local fire protection agency may require changes to the plan or may reject the plan if it does not adequately address fire hazards associated with the project as a whole or the individual phase.

- Utilize Fire-wise Land Management by encouraging the use of fire-resistant vegetation and the elimination of brush and chaparral in the immediate vicinity of development in areas with high fire threat.
- Promote Fire Management Planning that would help reduce fire threats in the region as part of the Compass Blueprint process and other ongoing regional planning efforts.
- Encourage the use of fire-resistant materials when constructing projects in areas with high fire threat.

- MM-HYD-1(b):
  - Complete, and have approved, a Stormwater Pollution Prevention Plan (SWPPP) prior to initiation of construction.
  - Implement Best Management Practices to reduce the peak stormwater runoff from the project site to the maximum extent practicable.
  - Comply with the Caltrans storm water discharge permit as applicable; and identify and implement Best Management Practices to manage site erosion, wash water runoff, and spill control.
  - Complete, and have approved, a Standard Urban Stormwater Management Plan, prior to occupancy of residential or commercial structures.
  - Ensure adequate capacity of the surrounding stormwater system to support stormwater runoff from new or rehabilitated structures or buildings.
  - Prior to construction within an area subject to Section 404 of the Clean Water Act, obtain all required permit approvals and certifications for construction within the vicinity of a watercourse:
  - U.S. Army Corps of Engineers (Corps): Section 404. Permit approval from the Corps should be obtained for the placement of dredge or fill material in Waters of the U.S., if any, within the interior of the project site, pursuant to Section 404 of the federal Clean Water Act.
  - Regional Walter Quality Control Board (RWQCB): Section 401 Water Quality Certification. Certification that the project will not violate state water quality standards is required before the Corps can issue a 404 permit, above.
  - California Department of Fish and Wildlife (CDFW): Section 1602 Lake and Streambed Alteration Agreement. Work that will alter the bed or bank of a stream requires authorization from CDFW.
  - Where feasible, restore or expand riparian areas such that there is no net loss of impervious surface as a result of the project.
  - Install structural water quality control features, such as drainage channels, detention basins, oil and grease traps, filter systems, and vegetated buffers to prevent pollution of adjacent water resources by polluted runoff where required by applicable urban storm water runoff discharge permits, on new facilities.
  - Provide structural storm water runoff treatment consistent with the applicable urban storm water runoff permit. Where Caltrans is the operator, the statewide permit applies.

- Provide operational best management practices for street cleaning, litter control, and catch basin cleaning are implemented to prevent water quality degradation in compliance with applicable storm water runoff discharge permits; and ensure treatment controls are in place as early as possible, such as during the acquisition process for rights-of-way, not just later during the facilities design and construction phase.
- Comply with applicable municipal separate storm sewer system discharge permits as well as Caltrans' storm water discharge permit including long-term sediment control and drainage of roadway runoff.
- Incorporate as appropriate treatment and control features such as detention basins, infiltration strips, and porous paving, other features to control surface runoff and facilitate groundwater recharge into the design of new transportation projects early on in the process to ensure that adequate acreage and elevation contours are provided during the right-of-way acquisition process.
- Design projects to maintain volume of runoff, where any downstream receiving water body has not been designed and maintained to accommodate the increase in flow velocity, rate, and volume without impacting the water's beneficial uses. Pre-project flow velocities, rates, and volumes must not be exceeded. This applies not only to increases in storm water runoff from the project site, but also to hydrologic changes induced by flood plain encroachment. Projects should not cause or contribute to conditions that degrade the physical integrity or ecological function of any downstream receiving waters.
- Provide culverts and facilities that do not increase the flow velocity, rate, or volume and/or acquiring sufficient storm drain easements that accommodate an appropriately vegetated earthen drainage channel.
- Upgrade stormwater drainage facilities to accommodate any increased runoff volumes. These upgrades may include the construction of detention basins or structures that will delay peak flows and reduce flow velocities, including expansion and restoration of wetlands and riparian buffer areas. System designs shall be completed to eliminate increases in peak flow rates from current levels.
- Encourage Low Impact Development (LID) and incorporation of natural spaces that reduce, treat, infiltrate and manage stormwater runoff flows in all new developments, where practical and feasible.
- If a proposed project has the potential to create a major new stormwater discharge to a water body with an established Total Maximum Daily Load (TMDL), a quantitative analysis of the anticipated pollutant loads in the stormwater discharges to the receiving waters should be carried out.

- MM-HYD-2(b):
  - For projects requiring continual dewatering facilities, implement monitoring systems and long-term administrative procedures to ensure proper water management that prevents degrading of surface water and minimizes, to the greatest extent possible, adverse impacts on groundwater for the life of the project,

Construction designs shall comply with appropriate building codes and standard practices including the Uniform Building Code.

- Maximize, where practical and feasible, permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. Minimize to the greatest extent possible, new impervious surfaces, including the use of in-lieu fees and off-site mitigation.
- Avoid designs that require continual dewatering where feasible.
- Avoid construction and siting on groundwater recharge areas, to prevent conversion of those areas to impervious surface.
- Reduce hardscape to the extent feasible to facilitate groundwater recharge as appropriate.

- MM-HYD-8(b):
  - Comply with Executive Order 11988 on Floodplain Management, which requires avoidance of incompatible floodplain development, restoration and preservation of the natural and beneficial floodplain values, and maintenance of consistency with the standards and criteria of the National Flood Insurance Program.
  - Ensure that all roadbeds for new highway and rail facilities be elevated at least one foot above the 100-year base flood elevation. Since alluvial fan flooding is not often identified on FEMA flood maps, the risk of alluvial fan flooding should be evaluated and projects should be sited to avoid alluvial fan flooding. Delineation of floodplains and alluvial fan boundaries should attempt to account for future hydrologic changes caused by global climate change.
- MM-LU-1(b):
  - Where an inconsistency with the adopted general plan is identified at the proposed project location, determine if the environmental, social, economic, and engineering benefits of the project warrant a variance from adopted zoning or an amendment to the general plan.
- MM-LU-2(b):
  - Consider alignments within or adjacent to existing public rights-of-way.
  - Consider designs to include sections above- or below-grade to maintain viable vehicular, cycling, and pedestrian connections between portions of communities where existing connections are disrupted by the transportation project.
  - Wherever feasible incorporate direct crossings, overcrossings, or undercrossings at regular intervals for multiple modes of travel (e.g., pedestrians, bicyclists, vehicles).
  - Consider realigning roadway or interchange improvements to avoid the affected area of residential communities or cohesive neighborhoods.
  - Where it has been determined that it is infeasible to avoid creating a barrier in an established community, consider other measures to reduce impacts, including but not limited to:
  - Alignment shifts to minimize the area affected.
  - Reduction of the proposed right-of-way take to minimize the overall area of impact.

- Provisions for bicycle, pedestrian, and vehicle access across improved roadways.
- Design new transportation facilities that consider access to existing community facilities. Identify and consider during the design phase of the project, community amenities and facilities in the design of the project.
- Design roadway improvements that minimize barriers to pedestrians and bicyclists. Determine during the design phase, pedestrian and bicycle routes that permit connections to nearby community facilities.

- MM-MIN-1(b):
  - Provide for the efficient use of known aggregate and mineral resources or locally important mineral resource recovery sites, by ensuring that the consumptive use of aggregate resources is minimized and that access to recoverable sources of aggregate is not precluded, as a result of construction, operation and maintenance of projects.
  - Where avoidance is infeasible, minimize impacts to the efficient and effective use of recoverable sources of aggregate through measures that have been identified in county and city general plans, or other comparable measures:
  - Recycle and reuse building materials resulting from demolition, particularly aggregate resources, to the maximum extent practicable.
  - Identify and use building materials, particularly aggregate materials, resulting from demolition at other construction sites in the SCAG region, or within a reasonable hauling distance of the project site.
  - Design transportation network improvements in a manner (such as buffer zones or the use of screening) that does not preclude adjacent or nearby extraction of known mineral and aggregate resources following completion of the improvement and during long-term operations.
  - Avoid or reduce impacts on known aggregate and mineral resources and mineral resource recovery sites through the evaluation and selection of project sites and design features (e.g., buffers) that minimize impacts on land suitable for aggregate and mineral resource extraction by maintaining portions of MRZ-2 areas in open space or other general plan land use categories and zoning that allow for mining of mineral resources.
- MM-NOISE-1(b):
  - Install temporary noise barriers during construction.
  - Include permanent noise barriers and sound-attenuating features as part of the project design.
  - Schedule construction activities consistent with the allowable hours pursuant to applicable general plan noise element or noise ordinance Where construction activities are authorized outside the limits established by the noise element of the general plan or noise ordinance, notify affected sensitive noise receptors and all parties who will experience noise levels in excess of the allowable limits for the specified land use, of the level of exceedance and duration of exceedance; and

provide a list of protective measures that can be undertaken by the individual, including temporary relocation or use of hearing protective devices.

- Limit speed and/or hours of operation of rail and transit systems during the selected periods of time to reduce duration and frequency of conflict with adopted limits on noise levels.
- Post procedures and phone numbers at the construction site for notifying the Lead Agency staff, local Police Department, and construction contractor (during regular construction hours and off-hours), along with permitted construction days and hours, complaint procedures, and who to notify in the event of a problem.
- Notify neighbors and occupants within 300 feet of the project construction area at least 30 days in advance of anticipated times when noise levels are expected to exceed limits established in the noise element of the general plan or noise ordinance.
- Hold a preconstruction meeting with the job inspectors and the general contractor/on-site project manager to confirm that noise measures and practices (including construction hours, neighborhood notification, posted signs, etc.) are completed.
- Designate an on-site construction complaint and enforcement manager for the project.
- Ensure that construction equipment are properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., mufflers, silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded.
- Ensure that impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for project construction are hydraulically or electrically powered to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust can and should be used. External jackets on the tools themselves can and should be used, if such jackets are commercially available and this could achieve a reduction of 5 dBA. Quieter procedures can and should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures.
- Ensure that construction equipment are not idle for an extended time in the vicinity of noise-sensitive receptors.
- Locate fixed/stationary equipment (such as generators, compressors, rock crushers, and cement mixers) as far as possible from noise-sensitive receptors.
- Locate new roadway lanes, roadways, rail lines, transit-related passenger station and related facilities, park-and-ride lots, and other new noise-generating facilities away from sensitive receptors to the maximum extent feasible.
- Where feasible, eliminate noise-sensitive receptors by acquiring freeway and rail rights-of-way.

- Use noise barriers to protect sensitive receptors from excessive noise levels during construction.
- Construct sound-reducing barriers between noise sources and noise-sensitive receptors to minimize exposure to excessive noise during operation of transportation improvement projects, including but not limited to earth-berms or sound walls.
- Where feasible, design projects so that they are depressed below the grade of the existing noise-sensitive receptor, creating an effective barrier between the roadway and sensitive receptors.
- Where feasible, improve the acoustical insulation of dwelling units where setbacks and sound barriers do not provide sufficient noise reduction.
- Monitor the effectiveness of noise reduction measures by taking noise measurements and installing adaptive mitigation measures to achieve the standards for ambient noise levels established by the noise element of the general plan or noise ordinance.

- MM-NOISE-2(b):
  - For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the potential vibration impacts to the structural integrity of the adjacent buildings within 50 feet of pile driving locations.
  - For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the threshold levels of vibration and cracking that could damage adjacent historic or other structure, and design means and construction methods to not exceed the thresholds.
  - For projects where pile driving would be necessary for construction due to geological conditions, utilize quiet pile driving techniques such as predrilling the piles to the maximum feasible depth, where feasible. Predrilling pile holes will reduce the number of blows required to completely seat the pile and will concentrate the pile driving activity closer to the ground where pile driving noise can be shielded more effectively by a noise barrier/curtain.
  - For projects where pile driving would be necessary for construction due to geological conditions, utilize quiet pile driving techniques such as the use of more than one pile driver to shorten the total pile driving duration.
- MM-PHE-2(b):
  - Evaluate alternate route alignments and transportation facilities that minimize the displacement of homes and businesses. Use an iterative design and impact analysis where impacts to homes or businesses are involved to minimize the potential of impacts on housing and displacement of people.
  - Prioritize the use existing ROWs, wherever feasible.
  - Develop a construction schedule that minimizes potential neighborhood deterioration from protracted waiting periods between right-of-way acquisition and construction.

- MM-PS-1(b):
  - Where the project has the potential to generate the need for expanded emergency response services which exceed the capacity of existing facilities, provide for the construction of new facilities directly as an element of the project or through dedicated fair share contributions toward infrastructure improvements.
- MM-PS-2(b):
  - Coordinate with public security agencies to ensure that there are adequate governmental facilities to maintain acceptable service ratios, response times, or other performance objectives for public protective security services and that any required additional construction of buildings is incorporated into the project description.
  - Where current levels of services at the project site are found to be inadequate, provide fair share contributions towards infrastructure improvements and/or personnel.
- MM-PS-3(b):
  - Where construction or expansion of school facilities is required to meet public school service ratios, require school district fees, as applicable.
- MM-REC-1(b):
  - Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, consider increasing the accessibility to natural areas and lands for outdoor recreation from the proposed project area, in coordination with local and regional open space planning and/or responsible management agencies.
  - Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, encourage patterns of urban development and land use which reduce costs on infrastructure and make better use of existing facilities, using strategies such as:
  - Increasing the accessibility to natural areas for outdoor recreation.
  - Promoting infill development and redevelopment to revitalize existing communities.
  - Utilizing “green” development techniques.
  - Promoting water-efficient land use and development.
  - Encouraging multiple uses.
  - Including trail systems and trail segments in General Plan recreation standards.
  - Prior to the issuance of permits, where construction and operation of projects would require the acquisition or development of protected open space or recreation lands, demonstrate that existing neighborhood parks can be expanded or new neighborhood parks developed such that there is no net decrease in acres of neighborhood park area available per capita in the HQTA.
  - MM-TRA-1(b):
  - Institute teleconferencing, telecommute and/or flexible work hour programs to reduce unnecessary employee transportation.

- Create a ride-sharing program by designating a certain percentage of parking spaces for ride sharing vehicles, designating adequate passenger loading and unloading for ride sharing vehicles, and providing a web site or message board for coordinating rides.
- Provide a vanpool for employees.
- Fund capital improvement projects to accommodate future traffic demand in the area.
- Provide a Transportation Demand Management (TDM) plan containing strategies to reduce on-site parking demand and single occupancy vehicle travel. The TDM shall include strategies to increase bicycle, pedestrian, transit, and carpools/vanpool use, including:
- Inclusion of additional bicycle parking, shower, and locker facilities that exceed the requirement
- Construction of bike lanes per the prevailing Bicycle Master Plan (or other similar document)
- Signage and striping onsite to encourage bike safety
- Installation of pedestrian safety elements (such as cross walk striping, curb ramps, countdown signals, bulb outs, etc.) to encourage convenient crossing at arterials
- Installation of amenities such as lighting, street trees, trash and any applicable streetscape plan.
- Direct transit sales or subsidized transit passes
- Guaranteed ride home program
- Pre-tax commuter benefits (checks)
- On-site car-sharing program (such as City Car Share, Zip Car, etc.)
- On-site carpooling program
- Distribution of information concerning alternative transportation options
- Parking spaces sold/leased separately
- Parking management strategies; including attendant/valet parking and shared parking spaces.
- Promote ride sharing programs e.g., by designating a certain percentage of parking spaces for high-occupancy vehicles, providing larger parking spaces to accommodate vans used for ride-sharing, and designating adequate passenger loading and unloading and waiting areas.
- Encourage bicycling to transit facilities by providing additional bicycle parking, locker facilities, and bike lane access to transit facilities when feasible.
- Encourage the use of public transit systems by enhancing safety and cleanliness on vehicles and in and around stations, providing shuttle service to public transit, offering public transit incentives and providing public education and publicity about public transportation services.
- Encourage bicycling and walking by incorporating bicycle lanes into street systems in regional transportation plans, new subdivisions, and large developments, creating bicycle lanes and walking paths directed to the location of schools and

other logical points of destination and provide adequate bicycle parking, and encouraging commercial projects to include facilities on-site to encourage employees to bicycle or walk to work.

- Build or fund a major transit stop within or near transit development upon consultation with applicable CTCs.
- Work with the school districts to improve pedestrian and bike access to schools and to restore or expand school bus service using lower-emitting vehicles.
- Provide information on alternative transportation options for consumers, residents, tenants and employees to reduce transportation-related emissions
- Adopt a comprehensive parking policy to discourage private vehicle use and encourage the use of alternative transportation by incorporating the following:
- Reduce the available parking spaces for private vehicles while increasing parking spaces for shared vehicles, bicycles, and other alternative modes of transportation;
- “Unbundle” parking (require that parking is paid for separately and is not included in the base rent for residential and commercial space);
- Use parking pricing to discourage private car use, especially at peak times.
- Educate consumers, residents, tenants and the public about options for reducing motor vehicle-related greenhouse gas emissions. Include information on trip reduction; trip linking; vehicle performance and efficiency (e.g., keeping tires inflated); and low or zero-emission vehicles.
- Purchase, or create incentives for purchasing, low or zero-emission vehicles.
- Create local “light vehicle” networks, such as neighborhood electric vehicle systems.
- Enforce and follow limits idling time for commercial vehicles, including delivery and construction vehicles.
- Provide the necessary facilities and infrastructure to encourage the use of low or zero-emission vehicles.
- Reduce VMT-related emissions by encouraging the use of public transit through adoption of new development standards that would require improvements to the transit system and infrastructure, increase safety and accessibility, and provide other incentives.
- Project Selection:
- Give priority to transportation projects that would contribute to a reduction in vehicle miles traveled per capita, while maintaining economic vitality and sustainability.
- Separate sidewalks whenever possible, on both sides of all new street improvement projects, except where there are severe topographic or natural resource constraints.
- Public Involvement:
- Carry out a comprehensive public involvement and input process that provides information about transportation issues, projects, and processes to community

members and other stakeholders, especially to those traditionally underserved by transportation services.

- Transit and Multimodal Impact Fees:
- Assess transit and multimodal impact fees for new developments to fund public transportation infrastructure, bicycle infrastructure, pedestrian infrastructure and other multimodal accommodations.
- Implement traffic and roadway management strategies to improve mobility and efficiency, and reduce associated emissions.
- System Monitoring:
- Monitor traffic and congestion to determine when and where new transportation facilities are needed in order to increase access and efficiency.
- Arterial Traffic Management:
- Modify arterial roadways to allow more efficient bus operation, including bus lanes and signal priority/preemption where necessary.
- Signal Synchronization:
- Expand signal timing programs where emissions reduction benefits can be demonstrated, including maintenance of the synchronization system, and will coordinate with adjoining jurisdictions as needed to optimize transit operation while maintaining a free flow of traffic.
- HOV Lanes:
- Encourage the construction of high-occupancy vehicle (HOV) lanes or similar mechanisms whenever necessary to relieve congestion and reduce emissions.
- Delivery Schedules:
- Establish ordinances or land use permit conditions limiting the hours when deliveries can be made to off-peak hours in high traffic areas.
- Implement and supporting trip reduction programs.
- Support bicycle use as a mode of transportation by enhancing infrastructure to accommodate bicycles and riders, and providing incentives.
- Establish standards for new development and redevelopment projects to support bicycle use, including amending the Development Code to include standards for safe pedestrian and bicyclist accommodations, and require new development and redevelopment projects to include bicycle facilities.
- Bicycle and Pedestrian Trails:
- Establish a network of multi-use trails to facilitate safe and direct off-street bicycle and pedestrian travel, and will provide bike racks along these trails at secure, lighted locations.
- Bicycle Safety Program:
- Develop and implement a bicycle safety educational program to teach drivers and riders the laws, riding protocols, routes, safety tips, and emergency maneuvers.
- Bicycle and Pedestrian Project Funding: Pursue and provide enhanced funding for bicycle and pedestrian facilities and access projects.
- Bicycle Parking:

- Adopt bicycle parking standards that ensure bicycle parking sufficient to accommodate 5 to 10 percent of projected use at all public and commercial facilities, and at a rate of at least one per residential unit in multiple-family developments (suggestion: check language with League of American Bicyclists).
- Adopt a comprehensive parking policy to discourage private vehicle use and encourage the use of alternative transportation by incorporating the following:
- Reduce the available parking spaces for private vehicles while increasing parking spaces for shared vehicles, bicycles, and other alternative modes of transportation;
- Eliminate or reduce minimum parking requirements for new buildings;
- "Unbundle" parking (require that parking is paid for separately and is not included in the base rent for residential and commercial space);
- Use parking pricing to discourage private vehicle use, especially at peak times;
- Create parking benefit districts, which invest meter revenues in pedestrian infrastructure and other public amenities;
- Establish performance pricing of street parking, so that it is expensive enough to promote frequent turnover and keep 15 percent of spaces empty at all times;
- Encourage shared parking programs in mixed-use and transit-oriented development areas.
- Establish policies and programs to reduce onsite parking demand and promote ride-sharing and public transit at large events, including:
- Promote the use of peripheral parking by increasing on-site parking rates and offering reduced rates for peripheral parking;
- Encourage special event center operators to advertise and offer discounted transit passes with event tickets;
- Encourage special event center operators to advertise and offer discount parking incentives to carpooling patrons, with four or more persons per vehicle for on-site parking;
- Promote the use of bicycles by providing space for the operation of valet bicycle parking service.
- Parking "Cash-out" Program:
- Require new office developments with more than 50 employees to offer a Parking "Cash-out" Program to discourage private vehicle use.
- Pedestrian and Bicycle Promotion:
- Work with local community groups and downtown business associations to organize and publicize walking tours and bicycle events, and to encourage pedestrian and bicycle modes of transportation.
- Fleet Replacement:
- Establish a replacement policy and schedule to replace fleet vehicles and equipment with the most fuel efficient vehicles practical, including gasoline hybrid and alternative fuel or electric models.

- MM-TRA-2(b):

- Encourage a comprehensive parking policy that prioritizes system management, increase rideshare, and telecommute opportunities, including investment in non-motorized transportation and discouragement against private vehicle use, and encouragement to maximize the use of alternative transportation:
- Advocate for a regional, market-based system to price or charge for auto trips during peak hours.
- Ensure that new developments incorporate both local and regional transit measures into the project design that promote the use of alternative modes of transportation.
- Coordinate controlled intersections so that traffic passes more efficiently through congested areas. Where traffic signals or streetlights are installed, require the use of Light Emitting Diode (LED) technology or similar technology.
- Encourage the use of car-sharing programs. Accommodations for such programs include providing parking spaces for the car-share vehicles at convenient locations accessible by public transportation.
- Reduce VHDs, especially daily heavy-duty truck vehicle hours of delay, through goods movement capacity enhancements, system management, increasing rideshare and work-at-home opportunities to reduce demand on the transportation system, investments in non-motorized transportation, maximizing the benefits of the land use-transportation connection and key transportation investments targeted to reduce heavy-duty truck delay.
- Determine traffic management strategies to reduce, to the maximum extent feasible, traffic congestion and the effects of parking demand by construction workers during construction of this project and other nearby projects that could be simultaneously under construction. Develop a construction management plan that include the following items and requirements, if determined feasible and applicable by the Lead Agency:
- A set of comprehensive traffic control measures, including scheduling of major truck trips and deliveries to avoid peak traffic hours, detour signs if required, lane closure procedures, signs, cones for drivers, and designated construction access routes.
- Notification procedures for adjacent property owners and public safety personnel regarding when major deliveries, detours, and lane closures will occur.
- Location of construction staging areas for materials, equipment, and vehicles at an approved location.
- A process for responding to, and tracking, complaints pertaining to construction activity, including identification of an onsite complaint manager. The manager shall determine the cause of the complaints and shall take prompt action to correct the problem. The Lead Agency shall be informed who the Manager is prior to the issuance of the first permit.
- Provision for accommodation of pedestrian flow.

- As necessary, provision for parking management and spaces for all construction workers to ensure that construction workers do not park in on street spaces.
- Any damage to the street caused by heavy equipment, or as a result of this construction, shall be repaired, at the project sponsor's expense., within one week of the occurrence of the damage (or excessive wear), unless further damage/excessive wear may continue; in such case, repair shall occur prior to issuance of a final inspection of the building permit. All damage that is a threat to public health or safety shall be repaired immediately. The street shall be restored to its condition prior to the new construction as established by the Lead Agency (or other appropriate government agency) and/or photo documentation, at the sponsor's expense, before the issuance of a Certificate of Occupancy.
- Any heavy equipment brought to the construction site shall be transported by truck, where feasible.
- No materials or equipment shall be stored on the traveled roadway at any time.
- Prior to construction, a portable toilet facility and a debris box shall be installed on the site, and properly maintained through project completion.
- All equipment shall be equipped with mufflers.
- Prior to the end of each work-day during construction, the contractor or contractors shall pick up and properly dispose of all litter resulting from or related to the project, whether located on the property, within the public rights-of-way, or properties of adjacent or nearby neighbors.
- Promote “least polluting” ways to connect people and goods to their destinations.
- Create an interconnected transportation system that allows a shift in travel from private passenger vehicles to alternative modes, including public transit, ride sharing, car sharing, bicycling and walking, by incorporating the following, if determined feasible and applicable by the Lead Agency:
- Ensure transportation centers are multi-modal to allow transportation modes to intersect.
- Provide adequate and affordable public transportation choices, including expanded bus routes and service, as well as other transit choices such as shuttles, light rail, and rail.
- To the extent feasible, extend service and hours of operation to underserved arterials and population centers or destinations such as colleges.
- Focus transit resources on high-volume corridors and high-boarding destinations such as colleges, employment centers and regional destinations.
- Coordinate schedules and routes across service lines with neighboring transit authorities.
- Support programs to provide “station cars” for short trips to and from transit nodes (e.g., neighborhood electric vehicles).
- Study the feasibility of providing free transit to areas with residential densities of 15 dwelling units per acre or more, including options such as removing service from less dense, underutilized areas to do so.

- Employ transit-preferential measures, such as signal priority and bypass lanes. Where compatible with adjacent land use designations, right-of-way acquisition or parking removal may occur to accommodate transit-preferential measures or improve access to transit. The use of access management shall be considered where needed to reduce conflicts between transit vehicles and other vehicles.
- Provide safe and convenient access for pedestrians and bicyclists to, across, and along major transit priority streets.
- Use park-and-ride facilities to access transit stations only at ends of regional transit ways or where adequate feeder bus service is not feasible.
- Upgrade and maintain transit system infrastructure to enhance public use, if determined feasible and applicable by the Lead Agency, including:
- Ensure transit stops and bus lanes are safe, convenient, clean and efficient. o Ensure transit stops have clearly marked street-level designation, and are accessible.
- Ensure transit stops are safe, sheltered, benches are clean, and lighting is adequate.
- Place transit stations along transit corridors within mixed-use or transit-oriented development areas at intervals of three to four blocks, or no less than one-half mile.
- Enhance customer service and system ease-of-use, if determined feasible and applicable by the Lead Agency, including:
- Develop a Regional Pass system to reduce the number of different passes and tickets required of system users.
- Implement “Smart Bus” technology, using GPS and electronic displays at transit stops to provide customers with “real-time” arrival and departure time information (and to allow the system operator to respond more quickly and effectively to disruptions in service).
- Investigate the feasibility of an on-line trip-planning program.
- Prioritize transportation funding to support a shift from private passenger vehicles to transit and other modes of transportation, if determined feasible and applicable by the Lead Agency, including:
- Give funding preference to improvements in public transit over other new infrastructure for private automobile traffic.
- Before funding transportation improvements that increase roadway capacity and VMT, evaluate the feasibility and effectiveness of funding projects that support alternative modes of transportation and reduce VMT, including transit, and bicycle and pedestrian access.
- Promote ride sharing programs, if determined feasible and applicable by the Lead Agency, including:
- Designate a certain percentage of parking spaces for ride-sharing vehicles.
- Designate adequate passenger loading, unloading, and waiting areas for ride-sharing vehicles.

- Provide a web site or message board for coordinating shared rides.
- Encourage private, for-profit community car-sharing, including parking spaces for car share vehicles at convenient locations accessible by public transit.
- Hire or designate a rideshare coordinator to develop and implement ridesharing programs.
- Support voluntary, employer-based trip reduction programs, if determined feasible and applicable by the Lead Agency, including:
- Provide assistance to regional and local ridesharing organizations.
- Advocate for legislation to maintain and expand incentives for employer ridesharing programs.
- Require the development of Transportation Management Associations for large employers and commercial/ industrial complexes.
- Provide public recognition of effective programs through awards, top ten lists, and other mechanisms.
- Implement a “guaranteed ride home” program for those who commute by public transit, ride-sharing, or other modes of transportation, and encourage employers to subscribe to or support the program.
- Encourage and utilize shuttles to serve neighborhoods, employment centers and major destinations.
- Create a free or low-cost local area shuttle system that includes a fixed route to popular tourist destinations or shopping and business centers.
- Work with existing shuttle service providers to coordinate their services.
- Facilitate employment opportunities that minimize the need for private vehicle trips, including:
- Amend zoning ordinances and the Development Code to include live/work sites and satellite work centers in appropriate locations.
- Encourage telecommuting options with new and existing employers, through project review and incentives, as appropriate.
- Enforce state idling laws for commercial vehicles, including delivery and construction vehicles.
- Organize events and workshops to promote GHG-reducing activities.
- Implement a Parking Management Program to discourage private vehicle use, including: o Encouraging carpools and vanpools with preferential parking and a reduced parking fee. o Institute a parking cash-out program. o Renegotiate employee contracts, where possible, to eliminate parking subsidies. o Install on-street parking meters with fee structures designed to discourage private vehicle use. o Establish a parking fee for all single-occupant vehicles.
- Work with school districts to improve pedestrian and bicycle to schools and restore school bus service
- Encourage the use of bicycles to transit facilities by providing bicycle parking lockers facilities and bike land access to transit facilities.

- Monitor traffic congestion to determine where and when new transportation facilities are needed to increase access and efficiency.
- Develop and implement a bicycle and pedestrian safety educational program to teach drivers and riders the laws, riding protocols, safety tips, and emergency maneuvers.
- Synchronize traffic signals to reduce congestion and air quality.
- Work with community groups and business associations to organize and publicize walking tours and bicycle evens.
- Support legislative efforts to increase funding for local street repair.

- MM-TRA-5(b):
  - Prior to construction, project implementation agencies can and should ensure that all necessary local and state road and railroad encroachment permits are obtained. The project implementation agency can and should also comply with all applicable conditions of approval. As deemed necessary by the governing jurisdiction, the road encroachment permits may require the contractor to prepare a traffic control plan in accordance with professional engineering standards prior to construction. Traffic control plans can and should include the following requirements: o Identification of all roadway locations where special construction techniques (e.g., directional drilling or night construction) would be used to minimize impacts to traffic flow.
  - Development of circulation and detour plans to minimize impacts to local street circulation. This may include the use of signing and flagging to guide vehicles through and/or around the construction zone.
  - Scheduling of truck trips outside of peak morning and evening commute hours.
  - Limiting of lane closures during peak hours to the extent possible.
  - Usage of haul routes minimizing truck traffic on local roadways to the extent possible.
  - Inclusion of detours for bicycles and pedestrians in all areas potentially affected by project construction.
  - Installation of traffic control devices as specified in the California Department of Transportation Manual of Traffic Controls for Construction and Maintenance Work Zones.
  - Development and implementation of access plans for highly sensitive land uses such as police and fire stations, transit stations, hospitals, and schools. The access plans would be developed with the facility owner or administrator. To minimize disruption of emergency vehicle access, affected jurisdictions can and should be asked to identify detours for emergency vehicles, which will then be posted by the contractor. Notify in advance the facility owner or operator of the timing, location, and duration of construction activities and the locations of detours and lane closures.
  - Storage of construction materials only in designated areas.

- Coordination with local transit agencies for temporary relocation of routes or bus stops in work zones, as necessary.
- Ensure the rapid repair of transportation infrastructure in the event of an emergency through cooperation among public agencies and by identifying critical infrastructure needs necessary for: a) emergency responders to enter the region, b) evacuation of affected facilities, and c) restoration of utilities.
- Enhance emergency preparedness awareness among public agencies and with the public at large.
- Provision for collaboration in planning, communication, and information sharing before, during, or after a regional emergency through the following:
- Incorporate strategies and actions pertaining to response and prevention of security incidents and events as part of the on-going regional planning activities.
- Provide a regional repository of GIS data for use by local agencies in emergency planning, and response, in a standardized format.
- Enter into mutual aid agreements with other local jurisdictions, in coordination with the California OES, in the event that an event disrupts the jurisdiction's ability to function.

- MM-USS-4(b):
  - Reduce exterior consumptive uses of water in public areas, and should promote reductions in private homes and businesses, by shifting to drought-tolerant native landscape plantings (xeriscaping), using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives.
  - Promote the availability of drought-resistant landscaping options and provide information on where these can be purchased. Use of reclaimed water especially in median landscaping and hillside landscaping can and should be implemented where feasible.
  - Implement water conservation best practices such as low-flow toilets, water-efficient clothes washers, water system audits, and leak detection and repair.
  - Ensure that projects requiring continual dewatering facilities implement monitoring systems and long-term administrative procedures to ensure proper water management that prevents degrading of surface water and minimizes, to the greatest extent possible, adverse impacts on groundwater for the life of the project. Comply with appropriate building codes and standard practices including the Uniform Building Code.
  - Maximize, where practical and feasible, permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. Minimized new impervious surfaces to the greatest extent possible, including the use of in-lieu fees and off-site mitigation.
  - Avoid designs that require continual dewatering where feasible.
  - Where feasible, do not site transportation facilities in groundwater recharge areas, to prevent conversion of those areas to impervious surface.

- MM-USS-6(b):
- Integrate green building measures consistent with CALGreen (California Building Code Title 24) into project design including, but not limited to the following:
- Reuse and minimization of construction and demolition (C&D) debris and diversion of C&D waste from landfills to recycling facilities.
- Inclusion of a waste management plan that promotes maximum C&D diversion.
- Source reduction through (1) use of materials that are more durable and easier to repair and maintain, (2) design to generate less scrap material through dimensional planning, (3) increased recycled content, (4) use of reclaimed materials, and (5) use of structural materials in a dual role as finish material (e.g., stained concrete flooring, unfinished ceilings, etc.).
- Reuse of existing structure and shell in renovation projects.
- Design for deconstruction without compromising safety.
- Design for flexibility through the use of moveable walls, raised floors, modular furniture, moveable task lighting and other reusable building components.
- Development of indoor recycling program and space.
- Discourage the siting of new landfills unless all other waste reduction and prevention actions have been fully explored. If landfill siting or expansion is necessary, site landfills with an adequate landfill-owned, undeveloped land buffer to minimize the potential adverse impacts of the landfill in neighboring communities.
- Locally generated waste should be disposed of regionally, considering distance to disposal site. Encourage disposal near where the waste originates as much as possible. Promote green technologies for long-distance transport of waste (e.g., clean engines and clean locomotives or electric rail for waste-by-rail disposal systems) and consistency with SCAQMD and 2016 RTP/SCS policies can and should be required.
- Encourage waste reduction goals and practices and look for opportunities for voluntary actions to exceed the 50 percent waste diversion target.
- Encourage the development of local markets for waste prevention, reduction, and recycling practices by supporting recycled content and green procurement policies, as well as other waste prevention, reduction and recycling practices.
- Develop ordinances that promote waste prevention and recycling activities such as: requiring waste prevention and recycling efforts at all large events and venues; implementing recycled content procurement programs; and developing opportunities to divert food waste away from landfills and toward food banks and composting facilities.
- Develop alternative waste management strategies such as composting, recycling, and conversion technologies.
- Develop and site composting, recycling, and conversion technology facilities that have minimum environmental and health impacts.

- Require the reuse and recycle construction and demolition waste (including, but not limited to, soil, vegetation, concrete, lumber, metal, and cardboard).
- Integrate reuse and recycling into residential industrial, institutional and commercial projects.
- Provide recycling opportunities for residents, the public, and tenant businesses.
- Provide education and publicity about reducing waste and available recycling services.
- Continue to adopt programs to comply with state solid waste diversion rate mandates and, where possible, encourage further recycling to exceed these rates.
- Implement or expand city or county-wide recycling and composting programs for residents and businesses. This could include extending the types of recycling services offered (e.g., to include food and green waste recycling) and providing public education and publicity about recycling services.

- 2020-2045 RTP/SCS and the Connect SoCal PEIR Addendum #1, approved September 3, 2020[15]
  - PMM AES-1:
    - Use a palette of colors, textures, building materials that are graffiti-resistant, and/or plant materials that complement the surrounding landscape and development.
    - Use contour grading to better match surrounding terrain. Contour edges of major cut-and-fill to provide a more natural looking finished profile.
    - Design new corridor landscaping to respect existing natural and man-made features and to complement the dominant landscaping of the surrounding areas.
    - Replace and renew landscaping along corridors with road widenings, interchange projects, and related improvements.
    - Retain or replace trees bordering highways, so that clear-cutting is not evident.
    - Provide new corridor landscaping that respects and provides appropriate transition to existing natural and man-made features and is complementary to the dominant landscaping or native habitats of surrounding areas.
    - Reduce the visibility of construction staging areas by fencing and screening these areas with low contrast materials consistent with the surrounding environment, and by revegetating graded slopes and exposed earth surfaces at the earliest opportunity;
    - Use see-through safety barrier designs (e.g. railings rather than walls)
  - PMM AES-2:
    - Minimize contrasts in scale and massing between the projects and surrounding natural forms and development, minimize their intrusion into important viewsheds, and use contour grading to better match surrounding terrain in accordance with county and city hillside ordinances, where applicable.
    - Design landscaping along highway corridors to add significant natural elements and visual interest to soften the hard-edged, linear transportation corridors.

- Require development of design guidelines for projects that make elements of proposed buildings/facilities visually compatible or minimize visibility of changes in visual quality or character through use of hardscape and softscape solutions. Specific measures to be addressed include setback buffers, landscaping, color, texture, signage, and lighting criteria.
- Design projects consistent with design guidelines of applicable general plans.
- Require that sites are kept in a blight/nuisance-free condition. Remove blight or nuisances that compromise visual character or visual quality of project areas including graffiti abatement, trash removal, landscape management, maintenance of signage and billboards in good condition, and replace compromised native vegetation and landscape.
- Where sound walls are proposed, require sound wall construction and design methods that account for visual impacts as follows:
- use transparent panels to preserve views where sound walls would block views from residences;
- use landscaped earth berm or a combination wall and berm to minimize the apparent sound wall height;
- construct sound walls of materials whose color and texture complements the surrounding landscape and development;
- Design sound walls to increase visual interest, reduce apparent height, and be visually compatible with the surrounding area; and landscape the sound walls with plants that screen the sound wall, preferably with either native vegetation or landscaping that complements the dominant landscaping of surrounding areas

- PMM AES-3:
  - Use lighting fixtures that are adequately shielded to a point below the light bulb and reflector and that prevent unnecessary glare onto adjacent properties.
  - Restrict the operation of outdoor lighting for construction and operation activities to the hours of 7:00 a.m. to 10:00 p.m. or as otherwise required by applicable local rules or ordinances.
  - Use high pressure sodium and/or cut-off fixtures instead of typical mercury-vapor fixtures for outdoor lighting.
  - Use unidirectional lighting to avoid light trespass onto adjacent properties.
  - Design exterior lighting to confine illumination to the project site, and/or to areas which do not include light-sensitive uses.
  - Provide structural and/or vegetative screening from light-sensitive uses.
  - Shield and direct all new street and pedestrian lighting away from light-sensitive off-site uses.
  - Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces.
  - Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties.
- PMM AG-1:

- Require project sponsors to mitigate for loss of farmland by providing permanent protection of in-kind farmland in the form of easements, fees, or elimination of development rights/potential.
- Project relocation or corridor realignment to avoid Prime Farmland, Unique Farmland, or Farmland of Local or Statewide Importance.
- Maintain and expand agricultural land protections such as urban growth boundaries.
- Provide for mitigation fees to support a mitigation bank that invests in farmer education, agricultural infrastructure, water supply, marketing, etc. that enhance the commercial viability of retained agricultural lands.
- Minimize severance and fragmentation of agricultural land by constructing underpasses and overpasses at reasonable intervals to provide property access.
- Use berms, buffer zones, setbacks, and fencing to reduce conflicts between new development and farming uses and protect the functions of farmland.

- PMM AG-2:
  - Project relocation or corridor realignment to avoid lands in Williamson Act contracts.
  - Establish conservation easements consistent with the recommendations of the Department of Conservation, or 20-year Farmland Security Zone contracts (Government Code Section 51296 et seq.), 10-year Williamson Act contracts (Government Code Section 51200 et seq.), or use of other conservation tools available from the California Department of Conservation Division of Land Resource Protection.
- PMM AG-3:
  - Minimize construction related impacts to agricultural and forestry resources by locating materials and stationary equipment in such a way as to prevent conflict with agriculture and forestry resources.
- PMM AG-4:
  - Design proposed projects to minimize, to the greatest extent feasible, the loss of the highest valued agricultural land.
  - Redesign project features to minimize fragmenting or isolating Farmland. Where a project involves acquiring land or easements, ensure that the remaining non-project area is of a size sufficient to allow economically viable farming operations. The project proponents shall be responsible for acquiring easements, making lot line adjustments, and merging affected land parcels into units suitable for continued commercial agricultural management.
  - Reconnect utilities or infrastructure that serve agricultural uses if these are disturbed by project construction. If a project temporarily or permanently cuts off roadway access or removes utility lines, irrigation features, or other infrastructure, the project proponents shall be responsible for restoring access as necessary to ensure that economically viable farming operations are not interrupted.
- PMM AG-5:

- Manage project operations to minimize the introduction of invasive species or weeds that may affect agricultural production on adjacent agricultural land. Where a project has the potential to introduce sensitive species or habitats or have other spill-over effects on nearby agricultural lands, the project proponents shall be responsible for acquiring easements on nearby agricultural land and/or financially compensating for indirect effects on nearby agricultural land. Easements (e.g., flowage easements) shall be required for temporary or intermittent interruption in farming activities (e.g., because of seasonal flooding or groundwater seepage). Acquisition or compensation would be required for permanent or significant loss of economically viable operations.

- PMM AQ-1:
  - Minimize land disturbance.
  - Suspend grading and earth moving when wind gusts exceed 25 miles per hour unless the soil is wet enough to prevent dust plumes.
  - Cover trucks when hauling dirt.
  - Stabilize the surface of dirt piles if not removed immediately.
  - Limit vehicular paths on unpaved surfaces and stabilize any temporary roads.
  - Minimize unnecessary vehicular and machinery activities.
  - Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway.
  - Revegetate disturbed land, including vehicular paths created during construction to avoid future off-road vehicular activities.
  - On Caltrans projects, Caltrans Standard Specifications 10-Dust Control, 17-Watering, and 18-Dust Palliative shall be incorporated into project specifications.
  - Require contractors to assemble a comprehensive inventory list (i.e., make, model, engine year, horsepower, emission rates) of all heavy-duty off-road (portable and mobile) equipment (50 horsepower and greater) that could be used an aggregate of 40 or more hours for the construction project. Prepare a plan for approval by the applicable air district demonstrating achievement of the applicable percent reduction for a CARB-approved fleet. Daily logging of the operating hours of the equipment should also be required.
  - Ensure that all construction equipment is properly tuned and maintained.
  - Minimize idling time to 5 minutes or beyond regulatory requirements —saves fuel and reduces emissions.
  - Provide an operational water truck on-site at all times. Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas. Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway.
  - Utilize existing power sources (e.g., power poles) or clean fuel generators rather than temporary power generators.
  - Develop a traffic plan to minimize community impacts as a result of traffic flow interference from construction activities. The plan may include advance public

notice of routing, use of public transportation, and satellite parking areas with a shuttle service. Schedule operations affecting traffic for off-peak hours. Minimize obstruction of through traffic lanes. Provide a flag person to guide traffic properly and ensure safety at construction sites. Project sponsors should consider developing a goal for minimization of community impacts

- As appropriate require that portable engines and portable engine-driven equipment units used at the project work site, with the exception of on-road and off-road motor vehicles, obtain CARB Portable Equipment Registration with the state or a local district permit. Arrange appropriate consultations with the CARB or the District to determine registration and permitting requirements prior to equipment operation at the site.
- Require projects to use Tier 4 Final equipment or better for all engines above 50 horsepower (hp). In the event that construction equipment cannot meet to Tier 4 Final engine certification, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is approved by SCAG before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, construction equipment with Tier 4 Interim or reduction in the number and/or horsepower rating of construction equipment and/or limiting the number of construction equipment operating at the same time. All equipment must be tuned and maintained in compliance with the manufacturer's recommended maintenance schedule and specifications. All maintenance records for each equipment and their contractor(s) should make available for inspection and remain on-site for a period of at least two years from completion of construction, unless the individual project can demonstrate that Tier 4 engines would not be required to mitigate emissions below significance thresholds. Project sponsors should also consider including ZE/ZNE technologies where appropriate and feasible.
- Projects located within the South Coast Air Basin should consider applying for South Coast AQMD "SOON" funds which provides funds to applicable fleets for the purchase of commercially available low-emission heavy-duty engines to achieve near-term reduction of NOx emissions from in-use off-road diesel vehicles.
- Projects located within AB 617 communities should review the applicable Community Emissions Reduction Plan (CERP) for additional mitigation that can be applied to individual projects.
- Where applicable, projects should provide information about air quality related programs to schools, including the Environmental Justice Community Partnerships (EJCP), Clean Air Ranger Education (CARE), and Why Air Quality Matters programs.
- Projects should work with local cities and counties to install adequate signage that prohibits truck idling in certain locations (e.g., near schools and sensitive receptors).
- As applicable for airport projects, the following measures should be considered:

- Considering operational improvements to reduce taxi time and auxiliary power unit usage, where feasible. Additionally, consider single engine taxing, if feasible as allowed per Federal Aviation Administration guidelines.
- Set goals to achieve a reduction in emissions from aircraft operations over the lifetime of the proposed project.
- Require the use of ground service equipment (GSE) that can operate on battery-power. If electric equipment cannot be obtained, require the use of alternative fuel, the cleanest gasoline equipment, or Tier 4, at a minimum. Projects should work with local cities and counties to install adequate signage that prohibits truck idling in certain locations (e.g., near schools and sensitive receptors).
- As applicable for port projects, the following measures should be considered:
- Develop specific timelines for transitioning to zero emission cargo handling equipment (CHE).
- Develop interim performance standards with a minimum amount of CHE replacement each year to ensure adequate progress.
- Use short side electric power for ships, which may include tugboats and other ocean-going vessels or develop incentives to gradually ramp up the usage of shore power.
- Install the appropriate infrastructure to provide shore power to operate the ships. Electrical hookups should be appropriately sized.
- Maximize participation in the Port of Los Angeles' Vessel Speed Reduction Program or the Port of Long Beach's Green Flag Initiation Program in order to reduce the speed of vessel transiting within 40 nautical miles of Point Fermin.
- Encourage the participation in the Green Ship Incentives.
- Offer incentives to encourage the use of on-dock rail.
- As applicable for rail projects, the following measures should be considered:
- Provide the highest incentives for electric locomotives and then locomotives that meet Tier 5 emission standards with a floor on the incentives for locomotives that meet Tier 4 emission standards.
- Projects that will introduce sensitive receptors within 500 feet of freeways and other sources should consider installing high efficiency of enhanced filtration units, such as Minimum Efficiency Reporting Value (MERV) 13 or better. Installation of enhanced filtration units can be verified during occupancy inspection prior to the issuance of an occupancy permit.
- Develop an ongoing monitoring, inspection, and maintenance program for the MERV filters.
- Disclose potential health impacts to prospective sensitive receptors from living in close proximity to freeways or other sources of air pollution and the reduced effectiveness of air filtration systems when windows are open or residents are outside.

- Identify the responsible implementing and enforcement agency to ensure that enhanced filtration units are installed on-site before a permit of occupancy is issued.
- Disclose the potential increase in energy costs for running the HVAC system to prospective residents.
- Provide information to residents on where MERV filters can be purchased.
- Provide recommended schedule (e.g., every year or every six months) for replacing the enhanced filtration units.
- Identify the responsible entity such as future residents themselves, Homeowner's Association, or property managers for ensuring enhanced filtration units are replaced on time.
- Identify, provide, and disclose ongoing cost-sharing strategies, if any, for replacing the enhanced filtration units.
- Set criteria for assessing progress in installing and replacing the enhanced filtration units; and
- Develop a process for evaluating the effectiveness of the enhanced filtration units.
- Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities.
- The following criteria related to diesel emissions shall be implemented on by individual project sponsors as appropriate and feasible:
- Diesel nonroad vehicles on site for more than 10 total days shall have either (1) engines that meet EPA on road emissions standards or (2) emission control technology verified by EPA or CARB to reduce PM emissions by a minimum of 85%.
- Diesel generators on site for more than 10 total days shall be equipped with emission control technology verified by EPA or CARB to reduce PM emissions by a minimum of 85%.
- Nonroad diesel engines on site shall be Tier 2 or higher.
- Diesel nonroad construction equipment on site for more than 10 total days shall have either (1) engines meeting EPA Tier 4 nonroad emissions standards or (2) emission control technology verified by EPA or CARB for use with nonroad engines to reduce PM emissions by a minimum of 85% for engines for 50 hp and greater and by a minimum of 20% for engines less than 50 hp.
- Emission control technology shall be operated, maintained, and serviced as recommended by the emission control technology manufacturer.
- Diesel vehicles, construction equipment, and generators on site shall be fueled with ultra-low sulfur diesel fuel (ULSD) or a biodiesel blend approved by the original engine manufacturer with sulfur content of 15 ppm or less.
- The construction contractor shall maintain a list of all diesel vehicles, construction equipment, and generators to be used on site. The list shall include the following:
    - i. Contractor and subcontractor name and address, plus contact person responsible for the vehicles or equipment.

- ii. Equipment type, equipment manufacturer, equipment serial number, engine manufacturer, engine model year, engine certification (Tier rating), horsepower, engine serial number, and expected fuel usage and hours of operation.
- iii. For the emission control technology installed: technology type, serial number, make, model, manufacturer, EPA/CARB verification number/level, and installation date and hour-meter reading on installation date.

- The contractor shall establish generator sites and truck-staging zones for vehicles waiting to load or unload material on site. Such zones shall be located where diesel emissions have the least impact on abutters, the general public, and especially sensitive receptors such as hospitals, schools, daycare facilities, elderly housing, and convalescent facilities.
- The contractor shall maintain a monthly report that, for each on road diesel vehicle, nonroad construction equipment, or generator onsite, includes:
  - i. Hour-meter readings on arrival on-site, the first and last day of every month, and on off-site date.
  - ii. Any problems with the equipment or emission controls.
  - iii. Certified copies of fuel deliveries for the time period that identify:
    - 1. Source of supply
    - 2. Quantity of fuel
    - 3. Quantity of fuel, including sulfur content (percent by weight)
- Project should exceed Title-24 Building Envelope Energy Efficiency Standards (California Building Standards Code). The following measures can be used to increase energy efficiency:
- Install programmable thermostat timers
- Obtain Third-party HVAC commissioning and verification of energy savings (to be grouped with exceedance of Title 24).
- Install energy efficient appliances (Typical reductions for energy-efficient appliances can be found in the Energy Star and Other Climate Protection Partnerships Annual Reports.)
- Install higher efficacy public street and area lighting
- Limit outdoor lighting requirements
- Replace traffic lights with LED traffic lights
- Establish onsite renewable or carbon neutral energy systems – generic, solar power and wind power
- Utilize a combined heat and power system
- Establish methane recovery in Landfills and Wastewater Treatment Plants.
- Locate project near bike path/bike lane
- Provide pedestrian network improvements, such as interconnected street network, narrower roadways and shorter block lengths, sidewalks, accessibility to transit and transit shelters, traffic calming measures, parks and public spaces, minimize pedestrian barriers.

- Provide traffic calming measures, such as:
  - Marked crosswalks
  - Count-down signal timers
  - Curb extensions
  - Speed tables
  - Raised crosswalks
  - Raised intersections
  - Median islands
  - Tight corner radii ix. Roundabouts or mini-circles
  - On-street parking
  - Chicanes/chokers.
  - Create urban non-motorized zones
  - Provide bike parking in non-residential and multi-unit residential projects
  - Dedicate land for bike trails
  - Limit parking supply through:
  - Elimination (or reduction) of minimum parking requirements
  - Creation of maximum parking requirements
  - Provision of shared parking
  - Require residential area parking permit.
  - Provide ride-sharing programs
  - Designate a certain percentage of parking spacing for ride sharing vehicles
  - Designating adequate passenger loading and unloading and waiting areas for ride-sharing vehicles
  - Providing a web site or messaging board for coordinating rides
  - Permanent transportation management association membership and finding requirement.

- PMM BIO-1:
  - Require project design to avoid occupied habitat, potentially suitable habitat, and designated critical habitat, wherever practicable and feasible.
  - Where avoidance is determined to be infeasible, provide conservation measures to fulfill the requirements of the applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal ESA, Section 2081 of the California ESA to support issuance of an incidental take permit, and/or as identified in local or regional plans. Conservation strategies to protect the survival and recovery of federally and state-listed endangered and local special status species may include:
    - Impact minimization strategies
    - Contribution of in-lieu fees for in-kind conservation and mitigation efforts
    - Use of in-kind mitigation bank credits
    - Funding of research and recovery efforts
    - Habitat restoration
    - Establishment of conservation easements

- Permanent dedication of in-kind habitat

- Design projects to avoid desert native plants protected under the California Desert Native Plants Act, salvage and relocate desert native plants, and/or pay in lieu fees to support off-site long-term conservation strategies.
- Temporary access roads and staging areas will not be located within areas containing sensitive plants, wildlife species or native habitat wherever feasible, so as to avoid or minimize impacts to these species.
- Develop and implement a Worker Environmental Awareness Program (environmental education) to inform project workers of their responsibilities to avoid and minimize impacts on sensitive biological resources.
- Retain a qualified botanist to document the presence or absence of special status plants before project implementation.
- Appoint a qualified biologist to monitor construction activities that may occur in or adjacent to occupied sensitive species' habitat to facilitate avoidance of resources not permitted for impact.
- Appoint a qualified biologist to monitor implementation of mitigation measures.
- Schedule construction activities to avoid sensitive times for biological resources (e.g. steelhead spawning periods during the winter and spring, nesting bird season) and to avoid the rainy season when erosion and sediment transport is increased.
- Develop an invasive species control plan associated with project construction.
- If construction occurs during breeding seasons in or adjacent to suitable habitat, include appropriate sound attenuation measures required for sensitive avian species and other best management practices appropriate for potential local sensitive wildlife.
- Conduct pre-construction surveys to delineate occupied sensitive species' habitat to facilitate avoidance.
- Where projects are determined to be within suitable habitat and may impact listed or sensitive species that have specific field survey protocols or guidelines outlined by the USFWS, CDFW, or other local agency, conduct preconstruction surveys that follow applicable protocols and guidelines and are conducted by qualified and/or certified personnel.
- Project design should address the protection of habitat on both sides of a freeway to improve effectiveness of the crossings.
- Project sponsors shall consider the impacts of nitrogen deposition on sensitive species.

- PMM BIO-2:
  - Consult with the USFWS and NMFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal ESA.

- Consult with the USFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal ESA and any additional species afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-county area: Angeles, Cleveland, Los Padres, and San Bernardino.
- Consult with the CDFW where such state-designated sensitive or riparian habitats provide potential or occupied habitat for state-listed rare, threatened, and endangered species afforded protection pursuant to the California ESA, or Fully Protected Species afforded protection pursuant to the State Fish and Game Code.
- Consult with the CDFW pursuant to the provisions of Section 1600 of the State Fish and Game Code as they relate to Lakes and Streambeds.
- Consult with the USFWS, USFS, CDFW, and counties and cities in the SCAG region, where state-designated sensitive or riparian habitats are occupied by birds afforded protection pursuant to the MBTA during the breeding season.
- Consult with the CDFW for state-designated sensitive or riparian habitats where furbearing mammals, afforded protection pursuant to the provisions of the State Fish and Game Code for fur-beaming mammals, are actively using the areas in conjunction with breeding activities.
- Require project design to avoid sensitive natural communities and riparian habitats, wherever practicable and feasible. Where practicable and feasible, require upland buffers that sufficiently minimize impacts to riparian corridors.
- Where avoidance is determined to be infeasible, develop sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) to protect sensitive natural communities and riparian habitats and develop appropriate compensatory mitigation, where required.
- Appoint a qualified wetland biologist to monitor construction activities that may occur in or adjacent to sensitive communities.
- Appoint a qualified wetland biologist to monitor implementation of mitigation measures.
- Schedule construction activities to avoid sensitive times for biological resources and to avoid the rainy season when erosion and sediment transport is increased.
- When construction activities require stream crossings, schedule work during dry conditions and use rubber-wheeled vehicles, when feasible. Have a qualified wetland scientist determine if potential project impacts require a Notification of Lake or Streambed Alteration to CDFW during the planning phase of projects.
- Consult with local agencies, jurisdictions, and landowners where such state-designated sensitive or riparian habitats are afforded protection pursuant an adopted regional conservation plan.
- Install fencing and/or mark sensitive habitat to be avoided during construction activities.

- Salvage and stockpile topsoil (the surface material from 6 to 12 inches deep) and perennial native plants, when recommended by the qualified wetland biologist, for use in restoring native vegetation to areas of temporary disturbance within the project area. Salvage of soils containing invasive species, seeds and/or rhizomes will be avoided as identified by the qualified wetland biologist.
- Revegetate with appropriate native vegetation following the completion of construction activities, as identified by the qualified wetland biologist.
- Complete habitat enhancement (e.g., through removal of nonnative invasive wetland species and replacement with more ecologically valuable native species).
- Use Best Management Practices (BMPs) at construction sites to minimize erosion and sediment transport from the area. BMPs include encouraging growth of native vegetation in disturbed areas, using straw bales or other silt-catching devices, and using settling basins to minimize soil transport.

- PMM BIO-3:
  - Require project design to avoid federally protected aquatic resources consistent with the provisions of Sections 404 and 401 of the CWA, wherever practicable and feasible.
  - Where the lead agency has identified that a project, or other regionally significant project, has the potential to impact other wetlands or waters, such as those considered Waters Of the State of California under the State Wetland Definition and Procedures for Dischargers of Dredged or Fill Material to Waters of the State, not protected under Section 404 or 401 of the CWA, seek comparable coverage for these wetlands and waters in consultation with the SWRCB, applicable RWQCB, and CDFW.
  - Where avoidance is determined to be infeasible, develop sufficient conservation measures to fulfill the requirements of the applicable authorization for impacts to federal and state protected aquatic resource to support issuance of a permit under Section 404 of the CWA as administered by the USACE. The use of an authorized Nationwide Permit or issuance of an individual permit requires the project applicant to demonstrate compliance with the USACE's Final Compensatory Mitigation Rule. The USACE reviews projects to ensure environmental impacts to aquatic resources are avoided or minimized as much as possible. Consistent with the administration's performance standard of "no net loss of wetlands" a USACE permit may require a project proponent to restore, establish, enhance or preserve other aquatic resources in order to replace those affected by the proposed project. This compensatory mitigation process seeks to replace the loss of existing aquatic resource functions and area. Project proponents required to complete mitigation are encouraged to use a watershed approach and watershed planning information. The new rule establishes performance standards, sets timeframes for decision making, and to the extent possible, establishes equivalent requirements and standards for the three sources of compensatory mitigation:
  - Permittee-responsible mitigation

- Contribution of in-kind in-lieu fees
- Use of in-kind mitigation bank credits
- Where avoidance is determined to be infeasible and
- Where avoidance is determined to be infeasible and proposed projects' impacts exceed an existing Nationwide Permit (NWP) and/or California SWRCB-certified NWP, or applicable County Special Area Management Plan (SAMP), the lead agency should provide USACE and SWRCB (where applicable) an alternative analysis consistent with the Least Environmentally Damaging Practicable Alternatives in this order of priorities:
  - Avoidance
  - Impact Minimization
  - On-site alternatives
  - Off-site alternatives
- Require review of construction drawings by a certified wetland delineator as part of each project-specific environmental analysis to determine whether aquatic resources will be affected and, if necessary, perform formal wetland delineation.

- PMM BIO-4:
  - Consult with the USFS where impacts to migratory wildlife corridors may occur in an area afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-County area: Angeles, Cleveland, Los Padres, and San Bernardino.
  - Consult with counties, cities, and other local organizations when impacts may occur to open space areas that have been designated as important for wildlife movement related to local ordinances or conservation plans.
  - Prohibit construction activities within 500 feet of occupied breeding areas for wildlife afforded protection pursuant to Title 14 § 460 of the California Code of Regulations protecting furbearing mammals, during the breeding season.
  - Conduct a survey to identify active raptor and other migratory nongame bird nests by a qualified biologist at least two weeks before the start of construction at project sites from February 1 through August 31.
  - Prohibit construction activities with 300 feet of occupied nest of birds afforded protection pursuant to the Migratory Bird Treaty Act, during the breeding season.
  - Ensure that suitable nesting sites for migratory nongame native bird species protected under the Migratory Bird Treaty Act and/or trees with unoccupied raptor nests should only be removed prior to February 1 or following the nesting season.
  - When feasible and practicable, proposed projects will be designed to minimize impacts to wildlife movement and habitat connectivity and preserve existing and functional wildlife corridors.
  - Conduct site-specific analyses of opportunities to preserve or improve habitat linkages with areas on- and off-site.
  - Long linear projects with the possibility of impacting wildlife movement should analyze habitat linkages/wildlife movement corridors on a broad scale to avoid

critical narrow choke points that could reduce function of recognized movement corridor.

- Require review of construction drawings and habitat connectivity mapping by a qualified biologist to determine the risk of habitat fragmentation.
- Pursue mitigation banking to preserve habitat linkages and corridors (opportunities to purchase, maintain, and/or restore offsite habitat).
- When practicable and feasible design projects to promote wildlife corridor redundancy by including multiple connections between habitat patches.
- Evaluate the potential for installation of overpasses, underpasses, and culverts to create wildlife crossings in cases where a roadway or other transportation project may interrupt the flow of species through their habitat. Retrofitting of existing infrastructure in project areas should also be considered for wildlife crossings for purposes of mitigation.
- Install wildlife fencing where appropriate to minimize the probability of wildlife injury due to direct interaction between wildlife and roads or construction.
- Where avoidance is determined to be infeasible, design sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) and in accordance with the respective counties and cities general plans to establish plans to mitigate for the loss of fish and wildlife movement corridors and/or wildlife nursery sites. The consideration of conservation measures may include the following measures, in addition to the measures outlined in MMBIO-1(b), where applicable:
  - Wildlife movement buffer zones
  - Corridor realignment
  - Appropriately spaced breaks in center barriers
  - Stream rerouting
  - Culverts
  - Creation of artificial movement corridors such as freeway under- or overpasses
  - Other comparable measures
- Where the lead agency has identified that a RTP/SCS project, or other regionally significant project, has the potential to impact other open space or nursery site areas, seek comparable coverage for these areas in consultation with the USFWS, CDFW, NMFS, or other local jurisdictions.
- Incorporate applicable and appropriate guidance (e.g. FHWAHEP- 16-059), as well as best management practices, to benefit pollinators with a focus on native plants.
- Implement berms and sound/sight barriers at all wildlife crossings to encourage wildlife to utilize crossings. Sound and lighting should also be minimized in developed areas, particularly those that are adjacent to or go through natural habitats.
- Reduce lighting impacts on sensitive species through implementation of mitigation measures such as, but not limited to:

- Use high pressure sodium and/or cut-off fixtures instead of typical mercury vapor fixtures for outdoor lighting.
- Design exterior lighting to confine illumination to the project site
- Provide structural and/or vegetative screening from light-sensitive uses.
- Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces.
- Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties.
- Reduce noise impacts to sensitive species through implementation of mitigation measures such as, but not limited to:
- Install temporary noise barriers during construction.
- Include permanent noise barriers and sound-attenuating features as part of the project design. Barriers could be in the form of outdoor barriers, sound walls, buildings, or earth berms to attenuate noise at adjacent sensitive uses.
- Ensure that construction equipment are properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded.
- Use hydraulically or electrically powered tools (e.g., jack hammers, pavement breakers, and rock drills) for project construction to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust should be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves should be used, if such jackets are commercially available, and this could achieve a further reduction of 5 dBA. Quieter procedures should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures.
- Using rubberized asphalt or "quiet pavement" to reduce road noise for new roadway segments, roadways in which widening or other modifications require re-pavement, or normal reconstruction of roadways where re-pavement is planned
- Use equipment and trucks with the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds, wherever feasible) for project construction.
- Use techniques such as grade separation, buffer zones, landscaped berms, dense plantings, sound walls, reduced-noise paving materials, and traffic calming measures. u. [sic]
- Require large buffers between sensitive uses and freeways.
- Create corridor redundancy to help retain functional connectivity and resilience.

- PMM BIO-5:

- Consult with the appropriate local agency responsible for the administration of the policy or ordinance protecting biological resources.
- Prioritize retention of trees on-site consistent with local regulations. Provide adequate protection during the construction period for any trees that are to remain standing, as recommended by an International Society of Arboriculture (ISA) certified arborist.
- If specific project area trees are designated as “Protected Trees,” “Landmark Trees,” or “Heritage Trees,” obtain approval for encroachment or removals through the appropriate entity, and develop appropriate mitigation measures at that time, to ensure that the trees are replaced. Mitigation trees shall be locally collected native species, as directed by a qualified biologist.
- Appoint an ISA certified arborist to monitor construction activities that may occur in areas with trees are designated as “Protected Trees,” “Landmark Trees,” or “Heritage Trees,” to facilitate avoidance of resources not permitted for impact. Before the start of any clearing, excavation, construction or other work on the site, securely fence off every protected tree deemed to be potentially endangered by said site work. Keep such fences in place for duration of all such work. Clearly mark all trees to be removed.
- Establish a scheme for the removal and disposal of logs, brush, earth and other debris that will avoid injury to any protected tree. Where proposed development or other site work could encroach upon the protected perimeter of any protected tree, incorporate special measures to allow the roots to breathe and obtain water and nutrients. Minimize any excavation, cutting, filing, or compaction of the existing ground surface within the protected perimeter. Require that no change in existing ground level occur from the base of any protected tree at any time. Require that no burning or use of equipment with an open flame occur near or within the protected perimeter of any protected tree.
- Require that no storage or dumping of oil, gas, chemicals, or other substances that may be harmful to trees occur from the base of any protected trees, or any other location on the site from which such substances might enter the protected perimeter. Require that no heavy construction equipment or construction materials be operated or stored within a distance from the base of any protected trees. Require that wires, ropes, or other devices not be attached to any protected tree, except as needed for support of the tree. Require that no sign, other than a tag showing the botanical classification, be attached to any protected tree.
- Thoroughly spray the leaves of protected trees with water periodically during construction to prevent buildup of dust and other pollution that would inhibit leaf transpiration, as directed by the certified arborist.
- If any damage to a protected tree should occur during or as a result of work on the site, the appropriate local agency will be immediately notified of such damage. If, such tree cannot be preserved in a healthy state, as determined by the certified arborist, require replacement of any tree removed with another tree or trees on the

same site deemed adequate by the local agency to compensate for the loss of the tree that is removed. Remove all debris created as a result of any tree removal work from the property within two weeks of debris creation, and such debris shall be properly disposed of in accordance with all applicable laws, ordinances, and regulations. Design projects to avoid conflicts with local policies and ordinances protecting biological resources

- Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the applicable policy or ordinance shall be developed, such as to support issuance of a tree removal permit. The consideration of conservation measures may include:
- Avoidance strategies
- Contribution of in-lieu fees
- Planting of replacement trees
- Re-landscaping areas with native vegetation post-construction
- Other comparable measures developed in consultation with local agency and certified arborist.

- PMM BIO-6:
  - Consult with the appropriate federal, state, and/or local agency responsible for the administration of HCPs or NCCPs.
  - Wherever practicable and feasible, the project shall be designed to avoid lands preserved under the conditions of an HCP or NCCP.
  - Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the HCP and/or NCCP, which would include but not be limited to applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal Endangered Species Act or Section 2081 of the California ESA, shall be developed to support issuance of an incidental take permit or any other permissions required for development within the HCP/NCCP boundaries. The consideration of additional conservation measures would include the measures outlined in SMM-BIO-2, where applicable.
- PMM CULT-1:
  - Pursuant to CEQA Guidelines Section 15064.5, conduct a record search during the project planning phase at the appropriate Information Center to determine whether the project area has been previously surveyed and whether historical resources were identified.
  - During the project planning phase, retain a qualified architectural historian, defined as an individual who meets the Secretary of the Interior's (SOI) Professional Qualification Standards (PQS) in Architectural History, to conduct historic architectural surveys if a built environment resource greater than 45 years in age may be affected by the project or if recommended by the Information Center.
  - Comply with Section 106 of the National Historic Preservation Act (NHPA) including, but not limited to, projects for which federal funding or approval is required for the individual project. This law requires federal agencies to evaluate

the impact of their actions on resources included in or eligible for listing in the National Register. Federal agencies must coordinate with the State Historic Preservation Officer in evaluating impacts and developing mitigation. These mitigation measures may include, but are not limited to the following:

- Employ design measures to avoid historical resources and undertake adaptive reuse where appropriate and feasible. If resources are to be preserved, as feasible, carry out the maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction in a manner consistent with the Secretary of the Interior's Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings. If resources would be impacted, impacts should be minimized to the extent feasible.
- Where feasible, noise buffers/walls and/or visual buffers/landscaping should be constructed to preserve the contextual setting of significant built resources.
- If a project requires the relocation, rehabilitation, or alteration of an eligible historical resource, the Secretary of the Interior's Standards for the Treatment of Historic Properties should be used to the maximum extent possible to ensure the historical significance of the resource is not impaired. The application of the standards should be overseen by an architectural historian or historic architect meeting the SOI PQS. Prior to any construction activities that may affect the historical resource, a report, meeting industry standards, should identify and specify the treatment of character-defining features and construction activities and be provided to the Lead Agency for review and approval.
- If a project would result in the demolition or significant alteration of a historical resource eligible for or listed in the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), or local register, recordation should take the form of Historic American Buildings Survey (HABS), Historic American Engineering Record (HAER), or Historic American Landscape Survey (HALS) documentation, and should be performed by an architectural historian or historian who meets the SOI PQS. Recordation should meet the SOI Standards and Guidelines for Architectural and Engineering, which defines the products acceptable for inclusion in the HABS/HAER/HALS collection at the Library of Congress. The specific scope and details of documentation should be developed at the project level in coordination with the Lead Agency.
- During the project planning phase, obtain a qualified archaeologist, defined as one who meets the SOI PQS for archaeology, to conduct a record search at the appropriate Information Center of the California Historical Resources Information System (CHRIS) to determine whether the project area has been previously surveyed and whether resources were identified.
- Contact the NAHC to request a Sacred Lands File search and a list of relevant Native American contacts who may have additional information.
- During the project planning phase, obtain a qualified archaeologist or architectural historian (depending on applicability) to conduct archaeological and/or historic

architectural surveys as recommended by the qualified professional, the Lead Agency, or the Information Center. In the event the qualified professional or Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for archaeological resources. Survey shall be conducted where the records indicate that no previous survey has been conducted, or if survey has not been conducted within the past 10 years. If tribal resources are identified during tribal outreach, consultation, or the record search, a Native American representative traditionally affiliated with the project area, as identified by the NAHC, shall be given the opportunity to provide a representative or monitor to assist with archaeological surveys.

- If potentially significant archaeological resources are identified through survey, and impacts to these resources cannot be avoided, a Phase II Testing and Evaluation investigation should be performed by a qualified archaeologist prior to any construction-related ground-disturbing activities to determine significance. If resources determined significant or unique through Phase II testing, and avoidance is not possible, appropriate resource-specific mitigation measures should be established by the lead agency, in consultation with consulting tribes, where appropriate, and undertaken by qualified personnel. These might include a Phase III data recovery program implemented by a qualified archaeologist and performed in accordance with the OHP's Archaeological Resource Management Reports (ARMR): Recommended Contents and Format and Guidelines for Archaeological Research Designs. Additional options can include 1) interpretative signage, or 2) educational outreach that helps inform the public of the past activities that occurred in this area. Should the project require extended Phase I testing, Phase II evaluation, or Phase III data recovery, a Native American representative traditionally affiliated with the project area, as indicated by the NAHC, shall be given the opportunity to provide a representative or monitor to assist with the archaeological assessments. The long-term disposition of archaeological materials collected from a significant resource should be determined in consultation with the affiliated tribe(s), where relevant; this could include curation with a recognized scientific or educational repository, transfer to the tribe, or respectful reinternment in an area designated by the tribe.
- In cases where the project area is developed and no natural ground surface is exposed, sensitivity for subsurface resources should be assessed based on review of literature, geology, site development history, and consultation with tribal parties. If this archaeological desktop assessment indicates that the project is located in an area sensitive for archaeological resources, as determined by the Lead Agency in consultation with a qualified archaeologist, the project should retain an archaeological monitor and, in the case of sensitivity for tribal resources, a tribal monitor, to observe ground disturbing operations, including but not limited to grading, excavation, trenching, or removal of existing features of the subject

property. The archaeological monitor should be supervised by an archaeologist meeting the SOI PQS

- Conduct construction activities and excavation to avoid cultural resources (if identified). If avoidance is not feasible, further work may be needed to determine the importance of a resource. Retain a qualified archaeologist, and/or as appropriate, a qualified architectural historian who should make recommendations regarding the work necessary to assess significance. If the cultural resource is determined to be significant under state or federal guidelines, impacts to the cultural resource will need to be mitigated.
- Stop construction activities and excavation in the area where cultural resources are found until a qualified archaeologist can determine whether these resources are significant, and tribal consultation can be conducted, in the case of tribal resources. If the archaeologist determines that the discovery is significant, its long-term disposition should be determined in consultation with the affiliated tribe(s); this could include curation with a recognized scientific or educational repository, transfer to the tribe, or respectful reinternment in an area designated by the tribe.

- PMM CULT-2:
  - In the event of discovery or recognition of any human remains during construction or excavation activities associated with the project, in any location other than a dedicated cemetery, cease further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the coroner of the county in which the remains are discovered has been informed and has determined that no investigation of the cause of death is required.
  - If any discovered remains are of Native American origin, as determined by the county Coroner, an experienced osteologist, or another qualified professional:
  - Contact the County Coroner to contact the NAHC to designate a Native American Most Likely Descendant (MLD). The MLD should make a recommendation to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods. This may include obtaining a qualified archaeologist or team of archaeologists to properly excavate the human remains. In some cases, it is necessary for the Lead Agency, qualified archaeologist, or developer to also reach out to the NAHC to coordinate and ensure notification in the event the Coroner is not available.
  - If the NAHC is unable to identify a MLD, or the MLD fails to make a recommendation within 48 hours after being notified by the commission, or the landowner or his representative rejects the recommendation of the MLD and the mediation by the NAHC fails to provide measures acceptable to the landowner, obtain a culturally affiliated Native American monitor, and an archaeologist, if recommended by the Native American monitor, and rebury the Native American human remains and any associated grave goods, with appropriate dignity, on the property and in a location that is not subject to further subsurface disturbance.

- PMM GEO-1:
  - Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that site-specific geotechnical investigations conducted by a qualified geotechnical expert are conducted to ascertain soil types prior to preparation of project designs. These investigations can and should identify areas of potential failure and recommend remedial geotechnical measures to eliminate any problems.
  - Consistent with the requirements of the State Water Resources Control Board (SWRCB) for projects over one acre in size, obtain coverage under the General Construction Activity Storm Water Permit (General Construction Permit) issued by the SWRCB and prepare a stormwater pollution prevention plan (SWPPP) and submit the plan for review and approval by the Regional Water Quality Control Board (RWQCB). At a minimum, the SWPPP should include a description of construction materials, practices, and equipment storage and maintenance; a list of pollutants likely to contact stormwater; site-specific erosion and sedimentation control practices; a list of provisions to eliminate or reduce discharge of materials to stormwater; best management practices (BMPs); and an inspection and monitoring program.
  - Consistent with the requirements of the SWRCB and local regulatory agencies with oversight of development associated with the Plan, ensure that project designs provide adequate slope drainage and appropriate landscaping to minimize the occurrence of slope instability and erosion. Design features should include measures to reduce erosion caused by storm water. Road cuts should be designed to maximize the potential for revegetation.
  - Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that, prior to preparing project designs, new and abandoned wells are identified within construction areas to ensure the stability of nearby soils.
- PMM GEO-2:
  - Ensure compliance with the Paleontological Resources Preservation Act, the Federal Land Policy and Management Act, the Antiquities Act, Section 5097.5 of the Public Resources Code (PRC), adopted county and city general plans, and other federal, state and local regulations, as applicable and feasible, by adhering to and incorporating the performance standards and practices from the 2010 Society for Vertebrate Paleontology (SVP) standard procedures for the assessment and mitigation of adverse impacts to paleontological resources.
  - Obtain review by a qualified paleontologist (e.g. who meets the SVP standards for a Principal Investigator or Project Paleontologist or the Bureau of Land Management (BLM) standards for a Principal Investigator), to determine if the project has the potential to require ground disturbance of parent material with potential to contain unique paleontological or resources, or to require the substantial alteration of a unique geologic feature. The assessment should include

museum records searches, a review of geologic mapping and the scientific literature, geotechnical studies (if available), and potentially a pedestrian survey, if units with paleontological potential are present at the surface.

- Avoid exposure or displacement of parent material with potential to yield unique paleontological resources.
- Where avoidance of parent material with the potential to yield unique paleontological resources is not feasible:
- All on-site construction personnel receive Worker Education and Awareness Program (WEAP) training prior to the commencement of excavation work to understand the regulatory framework that provides for protection of paleontological resources and become familiar with diagnostic characteristics of the materials with the potential to be encountered.
- A qualified paleontologist prepares a Paleontological Resource Management Plan (PRMP) to guide the salvage, documentation and repository of unique paleontological resources encountered during construction. The PRMP should adhere to and incorporate the performance standards and practices from the 2010 SVP Standard procedures for the assessment and mitigation of adverse impacts to paleontological resources. If unique paleontological resources are encountered during construction, use a qualified paleontologist to oversee the implementation of the PRMP.
- Monitor ground disturbing activities in parent material, with a moderate to high potential to yield unique paleontological resources using a qualified paleontological monitor meeting the standards of the SVP or the BLM to determine if unique paleontological resources are encountered during such activities, consistent with the specified or comparable protocols.
- Identify where ground disturbance is proposed in a geologic unit having the potential for containing fossils and specify the need for a paleontological monitor to be present during ground disturbance in these areas.
- Avoid routes and project designs that would permanently alter unique geological features.
- Salvage and document adversely affected resources sufficient to support ongoing scientific research and education.
- Significant recovered fossils should be prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility.
- Following the conclusion of the paleontological monitoring, the qualified paleontologist should prepare a report stating that the paleontological monitoring requirement has been fulfilled and summarize the results of any paleontological finds. The report should be submitted to the lead CEQA and the repository curating the collected artifacts, and should document the methods and results of all work completed under the PRMP, including treatment of paleontological materials,

results of specimen processing, analysis, and research, and final curation arrangements.

- PMM GHG-1:
  - Integrate green building measures consistent with CALGreen (California Building Code Title 24), local building codes and other applicable laws, into project design including:
  - Use energy efficient materials in building design, construction, rehabilitation, and retrofit.
  - Install energy-efficient lighting, heating, and cooling systems (cogeneration); water heaters; appliances; equipment; and control systems.
  - Reduce lighting, heating, and cooling needs by taking advantage of light-colored roofs, trees for shade, and sunlight.
  - Incorporate passive environmental control systems that account for the characteristics of the natural environment.
  - Use high-efficiency lighting and cooking devices.
  - Incorporate passive solar design.
  - Use high-reflectivity building materials and multiple glazing.
  - Prohibit gas-powered landscape maintenance equipment.
  - Install electric vehicle charging stations.
  - Reduce wood burning stoves or fireplaces.
  - Provide bike lanes accessibility and parking at residential developments.
  - Reduce emissions resulting from projects through implementation of project features, project design, or other measures, such as those described in Appendix F of the State CEQA Guidelines.
  - Include off-site measures to mitigate a project's emissions.
  - Measures that consider incorporation of Best Available Control Technology (BACT) during design, construction and operation of projects to minimize GHG emissions, including but not limited to:
  - Use energy and fuel-efficient vehicles and equipment;
  - Deployment of zero- and/or near zero emission technologies;
  - Use lighting systems that are energy efficient, such as LED technology;
  - Use the minimum feasible amount of GHG-emitting construction materials;
  - Use cement blended with the maximum feasible amount of flash or other materials that reduce GHG emissions from cement production;
  - Incorporate design measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse;
  - Incorporate design measures to reduce energy consumption and increase use of renewable energy;
  - Incorporate design measures to reduce water consumption;
  - Use lighter-colored pavement where feasible;
  - Recycle construction debris to maximum extent feasible;
  - Plant shade trees in or near construction projects where feasible; and

- Solicit bids that include concepts listed above.
- Measures that encourage transit use, carpooling, bike-share and car-share programs, active transportation, and parking strategies, including, but not limited to the following:
- Promote transit-active transportation coordinated strategies;
- Increase bicycle carrying capacity on transit and rail vehicles;
- Improve or increase access to transit;
- Increase access to common goods and services, such as groceries, schools, and day care;
- Incorporate affordable housing into the project;
- Incorporate the neighborhood electric vehicle network;
- Orient the project toward transit, bicycle and pedestrian facilities;
- Improve pedestrian or bicycle networks, or transit service;
- Provide traffic calming measures;
- Provide bicycle parking;
- Limit or eliminate park supply through:
- Elimination (or reduction) of minimum parking requirements
- Creation of maximum parking requirements
- Provision of shared parking.
- Unbundle parking costs; Provide parking cash-out programs;
- Implement or provide access to commute reduction program;
- Incorporate bicycle and pedestrian facilities into project designs, maintaining these facilities, and providing amenities incentivizing their use; and planning for and building local bicycle projects that connect with the regional network;
- Improving transit access to rail and bus routes by incentives for construction of transit facilities within developments, and/or providing dedicated shuttle service to transit stations; and
- Adopting employer trip reduction measures to reduce employee trips such as vanpool and carpool programs, providing end-of-trip facilities, and telecommuting programs including but not limited to measures that:
- Provide car-sharing, bike sharing, and ride-sharing programs;
- Provide transit passes;
- Shift single occupancy vehicle trips to carpooling or vanpooling, for example providing ride-matching services;
- Provide incentives or subsidies that increase that use of modes other than single-occupancy vehicle;
- Provide on-site amenities at places of work, such as priority parking for carpools and vanpools, secure bike parking, and showers and locker rooms;
- Provide employee transportation coordinators at employment sites;
- Provide a guaranteed ride home service to users of non-auto modes.

- Designate a percentage of parking spaces for ride-sharing vehicles or high-occupancy vehicles, and provide adequate passenger loading and unloading for those vehicles;
- Land use siting and design measures that reduce GHG emissions, including:
- Developing on infill and brownfields sites;
- Building compact and mixed-use developments near transit;
- Retaining on-site mature trees and vegetation, and planting new canopy trees;
- Measures that increase vehicle efficiency, encourage use of zero and low emissions vehicles, or reduce the carbon content of fuels, including constructing or encouraging construction of electric vehicle charging stations or neighborhood electric vehicle networks, or charging for electric bicycles; and
- Measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling, composting, and reuse.
- Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities. The measures provided above are also intended to be applied in low income and minority communities as applicable and feasible.
- Require at least five percent of all vehicle parking spaces include electric vehicle charging stations, or at a minimum, require the appropriate infrastructure to facilitate sufficient electric charging for passenger vehicles and trucks to plug-in.
- Encourage telecommuting and alternative work schedules, such as:
  - Staggered starting times
  - Flexible schedules
  - Compressed work weeks
  - Implement commute trip reduction marketing, such as:
  - New employee orientation of trip reduction and alternative mode options
  - Event promotions
  - Publications
  - Implement preferential parking permit program
  - Implement school pool and bus programs
  - Price workplace parking, such as:
  - Explicitly charging for parking for its employees;
  - Implementing above market rate pricing;
  - Validating parking only for invited guests;
  - Not providing employee parking and transportation allowances; and
  - Educating employees about available alternatives.

- PMM HAZ-1:
  - Where the construction or operation of projects involves the transport of hazardous material, provide a written plan of proposed routes of travel demonstrating use of roadways designated for the transport of such materials.
  - Specify Project requirements for interim storage and disposal of hazardous materials during construction and operation. Storage and disposal strategies must

be consistent with applicable federal, state, and local statutes and regulations. Specify the appropriate procedures for interim storage and disposal of hazardous materials, anticipated to be required in support of operations and maintenance activities, in conformance with applicable federal, state, and local statutes and regulations, in the business plan for projects as applicable and appropriate.

- Submit a Hazardous Materials Business/Operations Plan for review and approval by the appropriate local agency. Once approved, keep the plan on file with the Lead Agency (or other appropriate government agency) and update, as applicable. The purpose of the Hazardous Materials Business/Operations Plan is to ensure that employees are adequately trained to handle the materials and provides information to the local fire protection agency should emergency response be required. The Hazardous Materials Business/Operations Plan should include the following:
- The types of hazardous materials or chemicals stored and/or used on-site, such as petroleum fuel products, lubricants, solvents, and cleaning fluids.
- The location of such hazardous materials.
- An emergency response plan including employee training information.
- A plan that describes the way these materials are handled, transported and disposed.
- Follow manufacturer's recommendations on use, storage, and disposal of chemical products used in construction.
- Avoid overtopping construction equipment fuel gas tanks.
- Properly contain and remove grease and oils during routine maintenance of construction equipment.
- Properly dispose of discarded containers of fuels and other chemicals.
- Prior to shipment remove the most volatile elements, including flammable natural gas liquids, as feasible.
- Identify and implement more stringent tank car safety standards.
- Improve rail transportation route analysis, and modification of routes based on that analysis.
- Use the best available inspection equipment and protocols and implement positive train control.
- Reduce train car speeds to 40 miles per hour when passing through urbanized areas of any size.
- Limit storage of crude oil tank cars in urbanized areas of any size and provide appropriate security in storage yards for all shipments.
- Notify in advance county and city emergency operations offices of all crude oil shipments, including a contact number that can provide real-time information in the event of an oil train derailment or accident.
- Report quarterly hazardous commodity flow information, including classification and characterization of materials being transported, to all first response agencies

(49 Code Fed. Regs. 15.5) along the mainline rail routes used by trains carrying crude oil identified.

- Fund training and outfitting emergency response crews that includes the cost of backfilling personnel while in training.
- Undertake annual emergency responses scenario/field based training including Emergency Operations Center Training activations with local emergency response agencies.
- PMM HAZ-2:
- Removal of the most volatile elements, including flammable natural gas liquids, prior to shipment;
- More stringent tank car safety standards;
- Improved rail transportation route analysis, and modification of routes based on that analysis;
- Utilization of the best available inspection equipment and protocols, and implementation of positive train control;
- Reduced train car speeds to 40 miles per hour when passing through urbanized areas of any size;
- Limitations on storage of hazardous materials tank cars in urbanized areas of any size and provide appropriate security in storage yards for all shipments;
- Advance notification to county and city emergency operations offices of all crude oil and hazardous materials shipments, including a contact number that can provide real-time information in the event of an oil train derailment or accident;
- Quarterly hazardous commodity flow information, including classification and characterization of materials being transported, to all first response agencies (49 Code Fed. Regs. 15.5) along the mainline rail routes used by trains carrying hazardous materials.

- PMM HAZ-3:
  - Where the construction and operation of projects involves the transport of hazardous materials, avoid transport of such materials within one-quarter mile of schools, when school is in session, wherever feasible.
  - Where it is not feasible to avoid transport of hazardous materials within one-quarter mile of schools on local streets, provide notifications of the anticipated schedule of transport of such materials.
- PMM HAZ-4:
  - For any listed sites or sites that have the potential for residual hazardous materials as a result of historic land uses, complete a Phase I Environmental Site Assessment, including a review and consideration of data from all known databases of contaminated sites, during the process of planning, environmental clearance, and construction for projects.
  - Where warranted due to the known presence of contaminated materials, submit to the appropriate agency responsible for hazardous materials/wastes oversight a Phase II Environmental Site Assessment report if warranted by a Phase I report

for the project site. The reports should make recommendations for remedial action, if appropriate, and be signed by a Registered Environmental Assessor, Professional Geologist, or Professional Engineer.

- Implement the recommendations provided in the Phase II Environmental Site Assessment report, where such a report was determined to be necessary for the construction or operation of the project, for remedial action.
- Submit a copy of all applicable documentation required by local, state, and federal environmental regulatory agencies, including but not limited to: permit applications, Phase I and II Environmental Site Assessments, human health and ecological risk assessments, remedial action plans, risk management plans, soil management plans, and groundwater management plans.
- Conduct soil sampling and chemical analyses of samples, consistent with the protocols established by the U.S. EPA to determine the extent of potential contamination beneath all underground storage tanks (USTs), elevator shafts, clarifiers, and subsurface hydraulic lifts when on-site demolition or construction activities would potentially affect a particular development or building.
- Consult with the appropriate local, state, and federal environmental regulatory agencies to ensure sufficient minimization of risk to human health and environmental resources, both during and after construction, posed by soil contamination, groundwater contamination, or other surface hazards including, but not limited to, underground storage tanks, fuel distribution lines, waste pits and sumps.
- Obtain and submit written evidence of approval for any remedial action if required by a local, state, or federal environmental regulatory agency.
- Cease work if soil, groundwater, or other environmental medium with suspected contamination is encountered unexpectedly during construction activities (e.g., identified by odor or visual staining, or if any underground storage tanks, abandoned drums, or other hazardous materials or wastes are encountered), in the vicinity of the suspect material. Secure the area as necessary and take all appropriate measures to protect human health and the environment, including but not limited to, notification of regulatory agencies and identification of the nature and extent of contamination. Stop work in the areas affected until the measures have been implemented consistent with the guidance of the appropriate regulatory oversight authority.
- Soil generated by construction activities should be stockpiled onsite in a secure and safe manner. All contaminated soils determined to be hazardous or non-hazardous waste must be adequately profiled (sampled) prior to acceptable reuse or disposal at an appropriate off-site facility. Complete sampling and handling and transport procedures for reuse or disposal, in accordance with applicable local, state and federal laws and policies.
- Groundwater pumped from the subsurface should be contained on-site in a secure and safe manner, prior to treatment and disposal, to ensure environmental and

health issues are resolved pursuant to applicable laws and policies. Utilize engineering controls, which include impermeable barriers to prohibit groundwater and vapor intrusion into the building.

- As needed and appropriate, prior to issuance of any demolition, grading, or building permit, submit for review and approval by the Lead Agency (or other appropriate government agency) written verification that the appropriate federal, state and/or local oversight authorities, including but not limited to the Regional Water Quality Control Board (RWQCB), have granted all required clearances and confirmed that the all applicable standards, regulations, and conditions have been met for previous contamination at the site.
- Develop, train, and implement appropriate worker awareness and protective measures to assure that worker and public exposure is minimized to an acceptable level and to prevent any further environmental contamination as a result of construction.
- If asbestos-containing materials (ACM) are found to be present in building materials to be removed, submit specifications signed by a certified asbestos consultant for the removal, encapsulation, or enclosure of the identified ACM in accordance with all applicable laws and regulations, including but not necessarily limited to: California Code of Regulations, Title 8; Business and Professions Code; Division 3; California Health and Safety Code Section 25915-25919.7; and other local regulations.
- Where projects include the demolitions or modification of buildings constructed prior to 1978, complete an assessment for the potential presence or lack thereof of ACM, lead based paint, and any other building materials or stored materials classified as hazardous waste by state or federal law.
- Where the remediation of lead-based paint has been determined to be required, provide specifications to the appropriate agency, signed by a certified Lead Supervisor, Project Monitor, or Project Designer for the stabilization and/or removal of the identified lead paint in accordance with all applicable laws and regulations, including but not necessarily limited to: California Occupational Safety and Health Administration's (Cal OSHA's) Construction Lead Standard, Title 8 California Code of Regulations (CCR) Section 1532.1 and Department of Health Services (DHS) Regulation 17 CCR Sections 35001-36100, as may be amended. If other materials classified as hazardous waste by state or federal law are present, the project sponsor should submit written confirmation to the appropriate local agency that all state and federal laws and regulations should be followed when profiling, handling, treating, transporting, and/or disposing of such materials.

- PMM HAZ-5:
  - Continue to coordinate locally and regionally based on ongoing review and integration of projected transportation and circulation conditions.

- Develop new methods of conveying projected and real time information to citizens using emerging electronic communication tools including social media and cellular networks;
- Continue to evaluate lifeline routes for movement of emergency supplies and evacuation.

- PMM HYD-1:
  - Complete, and have approved, a Stormwater Pollution Prevention Plan (SWPPP) prior to initiation of construction.
  - Implement Best Management Practices to reduce the peak stormwater runoff from the project site to the maximum extent practicable.
  - Comply with the Caltrans storm water discharge permit as applicable; and identify and implement Best Management Practices to manage site erosion, wash water runoff, and spill control.
  - Complete, and have approved, a Standard Urban Stormwater Management Plan, prior to occupancy of residential or commercial structures.
  - Ensure adequate capacity of the surrounding stormwater system to support stormwater runoff from new or rehabilitated structures or buildings.
  - Prior to construction within an area subject to Section 404 of the Clean Water Act, obtain all required permit approvals and certifications for construction within the vicinity of a watercourse:
  - Where feasible, restore or expand riparian areas such that there is no net loss of impervious surface as a result of the project.
  - Install structural water quality control features, such as drainage channels, detention basins, oil and grease traps, filter systems, and vegetated buffers to prevent pollution of adjacent water resources by polluted runoff where required by applicable urban storm water runoff discharge permits, on new facilities.
  - Provide operational best management practices for street cleaning, litter control, and catch basin cleaning are implemented to prevent water quality degradation in compliance with applicable storm water runoff discharge permits; and ensure treatment controls are in place as early as possible, such as during the acquisition process for rights-of-way, not just later during the facilities design and construction phase.
  - Comply with applicable municipal separate storm sewer system discharge permits as well as Caltrans' storm water discharge permit including long-term sediment control and drainage of roadway runoff.
  - Incorporate as appropriate treatment and control features such as detention basins, infiltration strips, and porous paving, other features to control surface runoff and facilitate groundwater recharge into the design of new transportation projects early on in the process to ensure that adequate acreage and elevation contours are provided during the right-of-way acquisition process.
  - Upgrade stormwater drainage facilities to accommodate any increased runoff volumes. These upgrades may include the construction of detention basins or

structures that will delay peak flows and reduce flow velocities, including expansion and restoration of wetlands and riparian buffer areas. System designs shall be completed to eliminate increases in peak flow rates from current levels. m) Encourage Low Impact Development (LID) and incorporation of natural spaces that reduce, treat, infiltrate and manage stormwater runoff flows in all new developments, where practical and feasible.

- PMM HYD-2:
  - Avoid designs that require continual dewatering where feasible. For projects requiring continual dewatering facilities, implement monitoring systems and long-term administrative procedures to ensure proper water management that prevents degrading of surface water and minimizes adverse impacts on groundwater for the life of the project, Construction designs shall comply with appropriate building codes and standard practices including the Uniform Building Code.
  - Maximize, where practical and feasible, permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. Minimize new impervious surfaces, including the use of in-lieu fees and off-site mitigation.
  - Avoid construction and siting on groundwater recharge areas, to prevent conversion of those areas to impervious surface.
  - Reduce hardscape to the extent feasible to facilitate groundwater recharge as appropriate.
- PMM HYD-4:
  - Ensure that all roadbeds for new highway and rail facilities be elevated at least one foot above the 100-year base flood elevation. Since alluvial fan flooding is not often identified on FEMA flood maps, the risk of alluvial fan flooding should be evaluated and projects should be sited to avoid alluvial fan flooding. Delineation of floodplains and alluvial fan boundaries should attempt to account for future hydrologic changes caused by global climate change.
- PMM LU-1:
  - a) Facilitate good design for land use projects that build upon and improve existing circulation patterns
  - Encourage implementing agencies to orient transportation projects to minimize impacts on existing communities by:
  - Selecting alignments within or adjacent to existing public rights of way.
  - Design sections above or below-grade to maintain viable vehicular, cycling, and pedestrian connections between portions of communities where existing connections are disrupted by the transportation project.
  - Wherever feasible incorporate direct crossings, overcrossings, or under crossings at regular intervals for multiple modes of travel (e.g., pedestrians, bicyclists, vehicles).

- Where it has been determined that it is infeasible to avoid creating a barrier in an established community, consider other measures to reduce impacts, including but not limited to:
- Alignment shifts to minimize the area affected.
- Reduction of the proposed right-of-way take to minimize the overall area of impact.
- Provisions for bicycle, pedestrian, and vehicle access across improved roadways.

- PMM LU-2:
  - When an inconsistency with the adopted general plan policy or land use regulation (adopted for the purpose of avoiding or mitigating an impact) is identified modify the transportation or land use project to eliminate the conflict; or, determine if the environmental, social, economic, and engineering benefits of the project warrant an amendment to the general plan or land use regulation.
- PMM MIN-1:
  - Provide for the efficient use of known aggregate and mineral resources or locally important mineral resource recovery sites, by ensuring that the consumptive use of aggregate resources is minimized and that access to recoverable sources of aggregate is not precluded, as a result of construction, operation and maintenance of projects.
  - Where avoidance is infeasible, minimize impacts to the efficient and effective use of recoverable sources of aggregate through measures that have been identified in county and city general plans, or other comparable measures such as:
  - Recycle and reuse building materials resulting from demolition, particularly aggregate resources, to the maximum extent practicable.
  - Identify and use building materials, particularly aggregate materials, resulting from demolition at other construction sites in the SCAG region, or within a reasonable hauling distance of the project site.
  - Design transportation network improvements in a manner (such as buffer zones or the use of screening) that does not preclude adjacent or nearby extraction of known mineral and aggregate resources following completion of the improvement and during long-term operations.
  - Avoid or reduce impacts on known aggregate and mineral resources and mineral resource recovery sites through the evaluation and selection of project sites and design features (e.g., buffers) that minimize impacts on land suitable for aggregate and mineral resource extraction by maintaining portions of MRZ2 areas in open space or other general plan land use categories and zoning that allow for mining of mineral resources.
- PMM NOISE-1:
  - Install temporary noise barriers during construction.
  - Include permanent noise barriers and sound-attenuating features as part of the project design. Barriers could be in the form of outdoor barriers, sound walls, buildings, or earth berms to attenuate noise at adjacent sensitive uses.

- Schedule construction activities consistent with the allowable hours pursuant to applicable general plan noise element or noise ordinance
- Post procedures and phone numbers at the construction site for notifying the Lead Agency staff, local Police Department, and construction contractor (during regular construction hours and off-hours), along with permitted construction days and hours, complaint procedures, and who to notify in the event of a problem.
- Notify neighbors and occupants within 300 feet of the project construction area at least 30 days in advance of anticipated times when noise levels are expected to exceed limits established in the noise element of the general plan or noise ordinance.
- Designate an on-site construction complaint and enforcement manager for the project.
- Ensure that construction equipment are properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded.
- Use hydraulically or electrically powered tools (e.g., jack hammers, pavement breakers, and rock drills) for project construction to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust should be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves should be used, if such jackets are commercially available, and this could achieve a further reduction of 5 dBA. Quieter procedures should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures.
- Where feasible, design projects so that they are depressed below the grade of the existing noise-sensitive receptor, creating an effective barrier between the roadway and sensitive receptors.
- Where feasible, improve the acoustical insulation of dwelling units where setbacks and sound barriers do not provide sufficient noise reduction.
- Using rubberized asphalt or "quiet pavement" to reduce road noise for new roadway segments, roadways in which widening or other modifications require re-pavement, or normal reconstruction of roadways where re-pavement is planned
- Projects that require pile driving or other construction noise above 90 dBA in proximity to sensitive receptors, should reduce potential pier drilling, pile driving and/or other extreme noise generating construction impacts greater than 90 dBA; a set of site specific noise attenuation measures should be completed under the supervision of a qualified acoustical consultant.

- Use land use planning measures, such as zoning, restrictions on development, site design, and buffers to ensure that future development is compatible with adjacent transportation facilities and land uses;
- Monitor the effectiveness of noise reduction measures by taking noise measurements and installing adaptive mitigation measures to achieve the standards for ambient noise levels established by the noise element of the general plan or noise ordinance.
- Use equipment and trucks with the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds, wherever feasible) for project construction.
- Stationary noise sources can and should be located as far from adjacent sensitive receptors as possible and they should be muffled and enclosed within temporary sheds, incorporate insulation barriers, or use other measures as determined by the Lead Agency (or other appropriate government agency) to provide equivalent noise reduction.
- Use of portable barriers in the vicinity of sensitive receptors during construction.
- Implement noise control at the receivers by temporarily improving the noise reduction capability of adjacent buildings (for instance by the use of sound blankets), and implement if such measures are feasible and would noticeably reduce noise impacts.
- Monitor the effectiveness of noise attenuation measures by taking noise measurements.
- Maximize the distance between noise-sensitive land uses and new roadway lanes, roadways, rail lines, transit centers, park-and-ride lots, and other new noise-generating facilities.
- Construct sound reducing barriers between noise sources and noise-sensitive land uses.
- Stationary noise sources can and should be located as far from adjacent sensitive receptors as possible and they should be muffled and enclosed within temporary sheds, incorporate insulation barriers, or use other measures as determined by the Lead Agency (or other appropriate government agency) to provide equivalent noise reduction.
- Use techniques such as grade separation, buffer zones, landscaped berms, dense plantings, sound walls, reduced-noise paving materials, and traffic calming measures.
- Locate transit-related passenger stations, central maintenance facilities, decentralized maintenance facilities, and electric substations away from sensitive receptors to the maximum extent feasible.
- Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities.

- PMM NOISE-2:

- For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the potential vibration impacts to the structural integrity of the adjacent buildings within 50 feet of pile driving locations.
- For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the threshold levels of vibration and cracking that could damage adjacent historic or other structure, and design means and construction methods to not exceed the thresholds.
- For projects where pile driving would be necessary for construction due to geological conditions, utilize quiet pile driving techniques such as predrilling the piles to the maximum feasible depth, where feasible. Predrilling pile holes will reduce the number of blows required to completely seat the pile and will concentrate the pile driving activity closer to the ground where pile driving noise can be shielded more effectively by a noise barrier/curtain.
- Restrict construction activities to permitted hours in accordance with local jurisdiction regulation.
- Properly maintain construction equipment and outfit construction equipment with the best available noise suppression devices (e.g., mufflers, silences, wraps).
- Prohibit idling of construction equipment for extended periods of time in the vicinity of sensitive receptors.

- PMM POP-1:
  - Evaluate alternate route alignments and transportation facilities that minimize the displacement of homes and businesses. Use an iterative design and impact analysis where impacts to homes or businesses are involved to minimize the potential of impacts on housing and displacement of people.
  - Prioritize the use existing ROWs, wherever feasible.
  - Develop a construction schedule that minimizes potential neighborhood deterioration from protracted waiting periods between right-of-way acquisition and construction.
  - Review capacities of available urban infrastructure and augment capacities as needed to accommodate demand in locations where growth is desirable to the local lead Agency and encouraged by the SCS (primarily TPAs, where applicable).
  - When General Plans and other local land use regulations are amended or updated, use the most recent growth projections and RHNA allocation plan.
- PMM PSP-1:
  - Coordinate with emergency response agencies to ensure that there are adequate governmental facilities to maintain acceptable service ratios, response times or other performance objectives for emergency response services and that any required additional construction of buildings is incorporated in to the project description.

- Where current levels of services at the project site are found to be inadequate, provide fair share contributions towards infrastructure improvements, as appropriate and applicable, to mitigate identified CEQA impacts.
- Project sponsors can and should develop traffic control plans fo
- individual projects. Traffic control plans should include information on lane closures and the anticipated flow of traffic during the construction period. The basic objective of each traffic control plan (TCP) is to permit the contractor to work within the public right of way efficiently and effectively while maintaining a safe, uniform flow of traffic. The construction work and the public traveling through the work zone in vehicles, bicycles or as pedestrians must be given equal consideration when developing a traffic control plan.

- PMM PSS-1:
  - Where construction or expansion of school facilities is required to meet public school service ratios, require school district fees, as applicable.
- PMM PSL-1:
  - Where construction or expansion of library facilities is required to meet public library service ratios, require library fees, as appropriate and applicable, to mitigate identified CEQA impacts.
- PMM REC-1:
  - Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, consider increasing the accessibility to natural areas and lands for outdoor recreation from the proposed project area, in coordination with local and regional open space planning and/or responsible management agencies.
  - Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, encourage patterns of urban development and land use which reduce costs on infrastructure and make better use of existing facilities, using strategies such as:
  - Increasing the accessibility to natural areas for outdoor recreation
  - Utilizing “green” development techniques
  - Promoting water-efficient land use and development
  - Encouraging multiple uses, such as the joint use of schools
  - Including trail systems and trail segments in General Plan recreation standards.
- PMM TRA-1:
  - Transportation demand management (TDM) strategies should be incorporated into individual land use and transportation projects and plans, as part of the planning process. Local agencies should incorporate strategies identified in the Federal Highway Administration’s publication: Integrating Demand Management into the Transportation Planning Process: A Desk Reference (August 2012) into the planning process (FHWA 2012). For example, the following strategies may be included to encourage use of transit and non-motorized modes of transportation and reduce vehicle miles traveled on the region’s roadways:

- include TDM mitigation requirements for new developments;
- incorporate supporting infrastructure for non-motorized modes, such as, bike lanes, secure bike parking, sidewalks, and crosswalks; § provide incentives to use alternative modes and reduce driving, such as, universal transit passes, road and parking pricing;
- implement parking management programs, such as parking cashout, priority parking for carpools and vanpools;
- develop TDM-specific performance measures to evaluate project specific and system-wide performance;
- incorporate TDM performance measures in the decision-making process for identifying transportation investments;
- implement data collection programs for TDM to determine the effectiveness of certain strategies and to measure success over time; and
- set aside funding for TDM initiatives.
- The increase in per capita VMT on facilities experiencing LOS F represents a significant impact compared to existing conditions. To assess whether implementation of these specific mitigation strategies would result in measurable traffic congestion reductions, implementing actions may need to be further refined within the overall parameters of the proposed Plan and matched to local conditions in any subsequent project-level environmental analysis.

- PMM TRA-2:
  - Prior to construction, project implementation agencies can and should ensure that all necessary local and state road and railroad encroachment permits are obtained. The project implementation agency can and should also comply with all applicable conditions of approval. As deemed necessary by the governing jurisdiction, the road encroachment permits may require the contractor to prepare a traffic control plan in accordance with professional engineering standards prior to construction. Traffic control plans can and should include the following requirements:
  - Identification of all roadway locations where special construction techniques (e.g., directional drilling or night construction) would be used to minimize impacts to traffic flow.
  - Development of circulation and detour plans to minimize impact to local street circulation. This may include the use of signing and flagging to guide vehicles through and/or around the construction zone.
  - Scheduling of truck trips outside of peak morning and evening commute hours.
  - Limiting of lane closures during peak hours to the extent possible.
  - Usage of haul routes minimizing truck traffic on local roadways to the extent possible.
  - Inclusion of detours for bicycles and pedestrians in all areas potentially affected by project construction.

- Installation of traffic control devices as specified in the California Department of Transportation Manual of Traffic Controls for Construction and Maintenance Work Zones.
- Development and implementation of access plans for highly sensitive land uses such as police and fire stations, transit stations, hospitals, and schools. The access plans would be developed with the facility owner or administrator. To minimize disruption of emergency vehicle access, affected jurisdictions can and should be asked to identify detours for emergency vehicles, which will then be posted by the contractor. Notify in advance the facility owner or operator of the timing, location, and duration of construction activities and the locations of detours and lane closures.
- Storage of construction materials only in designated areas.
- Coordination with local transit agencies for temporary relocation of routes or bus stops in work zones, as necessary
- Ensure the rapid repair of transportation infrastructure in the event of an emergency through cooperation among public agencies and by identifying critical infrastructure needs necessary for: a) emergency responders to enter the region, b) evacuation of affected facilities, and c) restoration of utilities.
- Enhance emergency preparedness awareness among public agencies and with the public at large.

- PMM TCR-1:
  - Avoidance and preservation of the resources in place, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria;
  - Treating the resource with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following: protecting the cultural character and integrity of the resource; protecting the traditional use of the resource; and protecting the confidentiality of the resource;
  - Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places; and protecting the resource.
- PMM USSW-2:
  - Integrate green building measures with CALGreen (California Building Code Title 24) into project design, including but not limited to the following:
  - Reuse and minimization of construction and demolition (C&D) debris and diversion of C&D waste from landfills to recycling facilities.
  - Inclusion of a waste management plan that promotes maximum C&D diversion.
  - Source reduction through (1) use of materials that are more durable and easier to repair and maintain, (2) design to generate less scrap material through dimensional planning, (3) increased recycled content, (4) use of reclaimed

materials, and (5) use of structural materials in a dual role as finish material (e.g., stained concrete flooring, unfinished ceilings, etc.).
- Reuse of existing structure and shell in renovation projects.
- Development of indoor recycling program and space.
- Discourage the siting of new landfills unless all other waste reduction and prevention actions have been fully explored. If landfill siting or expansion is necessary, site landfills with an adequate landfill-owned, undeveloped land buffer to minimize the potential adverse impacts of the landfill in neighboring communities.
- Discourage exporting of locally generated waste outside of the SCAG region during the construction and implementation of a project. Encourage disposal within the county where the waste originates as much as possible. Promote green technologies for long-distance transport of waste (e.g., clean engines and clean locomotives or electric rail for waste-by-rail disposal systems) and consistency with SCAQMD and Connect SoCal policies can and should be required.
- Encourage waste reduction goals and practices and look for opportunities for voluntary actions to exceed the 80 percent waste diversion target.
- Encourage the development of local markets for waste prevention, reduction, and recycling practices by supporting recycled content and green procurement policies, as well as other waste prevention, reduction and recycling practices.
- Develop ordinances that promote waste prevention and recycling activities such as: requiring waste prevention and recycling efforts at all large events and venues; implementing recycled content procurement programs; and developing opportunities to divert food waste away from landfills and toward food banks and composting facilities.
- Develop and site composting, recycling, and conversion technology facilities that have minimum environmental and health impacts.
- Integrate reuse and recycling into residential industrial, institutional and commercial projects.
- Provide education and publicity about reducing waste and available recycling services.
- Implement or expand city or county-wide recycling and composting programs for residents and businesses. This could include extending the types of recycling services offered (e.g., to include food and green waste recycling) and providing public education and publicity about recycling services.

- PMM USWW-1:
  - During the design and CEQA review of individual future projects, implementing agencies and projects sponsors shall determine whether sufficient wastewater capacity exists for the proposed projects. There CEQA determinations must ensure that the proposed development can be served by its existing or planned treatment capacity. If adequate capacity does not exist, project sponsors shall coordinate with the relevant service provider to ensure that adequate public

services and utilities could accommodate the increased demand, and if not, infrastructure improvements for the appropriate public service or utility shall be identified in each project's CEQA documentation. The relevant public service provider or utility shall be responsible for undertaking project-level review as necessary to provide CEQA clearance for new facilities.

- PMM USWS-1:
  - Reduce exterior consumptive uses of water in public areas, and should promote reductions in private homes and businesses, by shifting to drought-tolerant native landscape plantings, using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives.
  - Promote the availability of drought-resistant landscaping options and provide information on where these can be purchased. Use of reclaimed water especially in median landscaping and hillside landscaping can and should be implemented where feasible.
  - Implement water conservation best practices such as low-flow toilets, water-efficient clothes washers, water system audits, and leak detection and repair.
  - For projects located in an area with existing reclaimed water conveyance infrastructure and excess reclaimed water capacity, use reclaimed water for non-potable uses, especially landscape irrigation. For projects in a location planned for future reclaimed water service, projects should install dual plumbing systems in anticipation of future use. Large developments could treat wastewater onsite to tertiary standards and use it for non-potable uses onsite.
- PMM WF-1:
  - Launch fire prevention education for local cities and counties such that local fire agencies, homeowners, as well as commercial and industrial businesses are aware of potential sources of fire ignition and the related procedures to curb or lessen any activities that might initiate fire ignition.
  - Ensure structures in high fire risk areas are built to current state and federal standards which serve to greatly increase the chances the structure will survive a wildfire and also allow for people to shelter-in-place.
  - Improve road access for emergency response and evacuation so people can evacuate safely and timely when necessary.
  - Improve, and educate regarding, local emergency communications and notifications with residents and businesses.
  - Enforce defensible space regulations to keep overgrown and unmanaged vegetation, accumulations of trash and other flammable material away from structures.
  - Provide public education about wildfire risk and fire prevention measures, and safety procedures and practices to allow for safe evacuation and/or options to shelter-in-place.
  - Include external sprinklers with an independent water source to reduce flammability of structures.

- Include local solar power paired with batteries to reduce power flow in electricity lines.
- For developments in high fire-prone areas, have a fire protection plan for residents and businesses.
- Provide fire hazard and fire safety education for homeowners in or near fire hazard areas.
- Developments in fire-prone areas should have fire-resistant feature, such as:
- Ember-resistant vents
- Fire-resistant roofs
- Surrounding defensible space
- Proper maintenance and upkeep of structures and surrounding area

- PMM WF-2:
  - New development or infrastructure activity within very high hazard severity zones or SRAs shall be required to:
  - Submit a fire protection plan including the designation of fire watch staff;
  - Maintain water and other fire suppression equipment designated solely for firefighting on site for any construction and maintenance activities;
  - Locate construction and maintenance equipment in designate "safe areas" such that they do not discharge combustible materials; and
  - Designate trained fire watch staff during project construction to reduce risk of fire hazards.
  - The SCEA fails to incorporate feasible mitigation measures simply on the basis that it did not identify a potentially significant impact. Pub. Res. Code § 21155.2 subd. (a) is unambiguous in stating that transit priority projects must incorporate "all feasible mitigation measures, performance standards or criteria set forth in prior environmental impact reports," irrespective of whether the SCEA finds a less than significant impact with mitigation. The SCEA fails to address the feasibility of measures not incorporated into the Project, and thus fails to meet the requirements of Pub. Res. Code § 21155.2.

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[14] Southern California Association of Governments (April 7, 2016) Resolution No. 16-578-1: A Resolution of the Southern California Association of Government Certifying the Final Program Environmental Impact Report Prepared for the 2016 – 2040 Regional Transportation Plan / Sustainable Communities Strategy (SCH#2015031035) and Adopting Findings of Fact, a Statement of Overriding Considerations and a Mitigation, Monitoring and Reporting Program Pursuant to the California Environmental Quality Act, Exhibit B, "Mitigation Monitoring and Reporting Program," available at https://scag.ca.gov/sites/main/files/fileattachments/2016fpeir_exhibitb_mmrp.pdf?1623887711 at pp. 11 through 63.

[15] SCAG (Sept. 3, 2020) A Resolution of the Southern California Association of Governments (SCAG) Adopting the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal) Program Environmental Impact Report (PEIR) Addendum and Approving Connect SoCal in its

Entirety, Exhibit A, "Revised Mitigation Monitoring and Reporting Program, available at https://scag.ca.gov/sites/main/files/file-attachments/exhibita_connectsocal_peir_revisedmmrp.pdf ?1606004474 at pp. 2 – 52.

RESPONSE TO COMMENT 2A-8

The comment restates that the Project requires the implementation of all feasible mitigation measures from the 2020–2045 RTP/SCS EIR and lists all the mitigation measures from the 2020–2045 RTP/SCS EIR, including those that are not applicable to the Project, such as those related to agricultural, biological, and mineral resources and wildfire, to name a few. Table 3.3, beginning on page 73 of the SCEA, provides a discussion of the applicability of the mitigation measures from the 2020–2045 RTP/SCS EIR to the Project.

In addition, as discussed above under Response to Comment 2A.7, the Project incorporates all feasible mitigation for impacts that may result in a potentially significant impact, and no additional mitigation measures are required.

COMMENT 2A-9

1. The Project Fails to Demonstrate Consistency with SCAG's RTP/SCS Plans.

The Project's proposed parking development also negatively affects the SCEA's analysis of consistency with the following goals and policies of the RTP/SCS Plans:

- 2016-2040 RTP/SCS[16]
  - Goal 1: Align the plan investments and policies with improving regional economic development and competitiveness.
  - Goal 2: Maximize mobility and accessibility for all people and goods in the region.
  - Goal 3: Ensure travel safety and reliability for all people and goods in the region.
  - Goal 4: Preserve and ensure a sustainable regional transportation system.
  - Goal 5: Maximize the productivity of our transportation system.
  - Goal 6: Protect the environment and health of our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking).
  - Goal 7: Actively encourage and create incentives for energy efficiency, where possible.
  - Goal 8: Encourage land use and growth patterns that facilitate transit and active transportation.
  - Goal 9: Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.
  - Guiding Policy 1: Transportation investments shall be based on SCAG's adopted regional Performance Indicators.

  - Guiding Policy 2: Ensuring safety, adequate maintenance and efficiency of operations on the existing multimodal transportation system should be the highest RTP/ SCS priorities for any incremental funding in the region.
  - Guiding Policy 3: RTP/SCS land use and growth strategies in the RTP/SCS will respect local input and advance smart growth initiatives.
  - Guiding Policy 4: Transportation demand management (TDM) and active transportation will be focus areas, subject to Policy 1.
  - Guiding Policy 5: HOV gap closures that significantly increase transit and rideshare usage will be supported and encouraged, subject to Policy 1.
  - Guiding Policy 6: The RTP/SCS will support investments and strategies to reduce non-recurrent congestion and demand for single occupancy vehicle use, by leveraging advanced technologies.
  - Guiding Policy 7: The RTP/SCS will encourage transportation investments that result in cleaner air, a better environment, a more efficient transportation system and sustainable outcomes in the long run.
  - Guiding Policy 8: Monitoring progress on all aspects of the Plan, including the timely implementation of projects, programs, and strategies, will be an important and integral component of the Plan.
- 2020-2045 RTP/SCS[17]
  - Goal 1: Encourage regional economic prosperity and global competitiveness.
  - Goal 2: Improve mobility, accessibility, reliability, and travel safety for people and goods.
  - Goal 3: Enhance the preservation, security, and resilience of the regional transportation system.
  - Goal 4: Increase person and goods movement and travel choices within the transportation system.
  - Goal 5: Reduce greenhouse gas emissions and improve air quality.
  - Goal 6: Support healthy and equitable communities.
  - Goal 7: Adapt to a changing climate and support an integrated regional development pattern and transportation network.
  - Goal 8: Leverage new transportation technologies and data-driven solutions that result in more efficient travel.
  - Goal 9: Encourage development of diverse housing types in areas that are supported by multiple transportation options.
  - Goal 10: Promote conservation of natural and agricultural lands and restoration of habitats.
  - Guiding Principle 1: Base transportation investments on adopted regional performance indicators and MAP-21/FAST Act regional targets.
  - Guiding Principle 2: Place high priority for transportation funding in the region on projects and programs that improve mobility, accessibility, reliability and safety, and that preserve the existing transportation system.

- Guiding Principle 3: Assure that land use and growth strategies recognize local input, promote sustainable transportation options, and support equitable and adaptable communities.
- Guiding Principle 4: Encourage RTP/SCS investments and strategies that collectively result in reduced non-recurrent congestion and demand for single occupancy vehicle use, by leveraging new transportation technologies and expanding travel choices.
- Guiding Principle 5: Encourage transportation investments that will result in improved air quality and public health, and reduced greenhouse gas emissions.
- Guiding Principle 6: Monitor progress on all aspects of the Plan, including the timely implementation of projects, programs, and strategies.
- Guiding Principle 7: Regionally, transportation investments should reflect best-known science regarding climate change vulnerability, in order to design for long term resilience.

The provision of parking well above the level required of a TPP would cut against these goals. The SCEA process should not be used to avoid larger environmental review simply by virtue of proximity to a rail stop. The Project should be revised or should be subject to more robust environmental review.

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16 SCAG 2016-2040 RTP/SCS at pp. 64-65.

17 Connect SoCal, supra, at pp. 9-10.

RESPONSE TO COMMENT 2A-9

The commenter states the SCEA failed to provide a consistency analysis with all of the goals and guiding principles in SCAG's 2020-2045 RTP/SCS. Under state planning law (SB 375), the SCS developed as part of the RTP cannot supersede local General Plan policies. Rather, the RTP/SCS provides a regional policy foundation that local governments may build upon if they so choose and generally includes the quantitative growth projections for each city and county in the region going forward. SCAG has clearly indicated that lead agencies/local jurisdictions have sole discretion to make consistency findings with the SCS for the purposes of CEQA. Additionally, plans reflect a range of competing interests, and agencies are given great deference to determine consistency with their own plans. A proposed project should be considered consistent with a general plan or elements of a general plan if it furthers one or more policies and does not obstruct other policies.[16] Generally, given that land use plans reflect a range of competing interests, a project should be compatible with a plan's overall goals and objectives but need not be in perfect conformity with every plan policy.

As extensively discussed in Section 4.XI, Land Use and Planning, the Project would not conflict with any applicable goals, objectives, and policies of the 2020-2045 RTP/SCS adopted for the

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16 Office of Planning and Research [OPR], State of California General Plan Guidelines (2017).

purpose of avoiding or mitigating an environmental effect, as supported by the consistency assessment presented in Table 3.2 beginning on page 64 of the SCEA. As such, the Project does not need to be in exact conformity with every goal, objective and policy, and the Project would not conflict with the general goals of the RTP/SCS.

COMMENT 2A-10

E. The SCEA Fails to Adequately Assess and Mitigate Impacts on Noise.

If a project has a significant effect on the environment, an agency may approve the project only upon finding that it has "eliminated or substantially lessened all significant effects on the environment where feasible" and that any unavoidable significant effects on the environment are "acceptable due to overriding concerns." CEQA Guidelines, § 15092, subd. (b)(2)(A–B).

The SCEA here finds that the construction of the Project would have the potential to result in significant noise impacts at off-site sensitive receptor locations from on-site construction activities via construction equipment. These impacts are particularly detrimental given that the SCEA identifies at least four (4) sensitive receptor locations within 500 feet of the Project Site. Accordingly, the SCEA imposes mitigation measures such as MM NOI-1 which calls for the implementation of noise control devices, such as mufflers, lagging, and/or motor enclosures capable of reducing construction equipment noise by 10 dBA.

However, the SCEA's mitigation measure is problematic for at least two reasons. First, the assumed elevation (at ground level) of the noise source is not defined. This information is crucial because it is key to the performance of the noise control devices. The Project proposes a 22-story hotel and 23-story mixed-use building. Thus, for example, assuming the noise control device sits on the ground floor at the perimeter of the job site, it would not adequately mitigate noise sources elevated above the ground level as construction of the building progresses. The mitigation measures must be revised to fully explain how the noise control devices would be used to mitigate noise impacts at a minimum of 15 dBA for elevated sources during construction of the two 22- and 23-story buildings.

Further, the SCEA is not clear on where, if at all, noise-control barriers would be placed and whether those would be movable and adjustable to ensure all construction noise is mitigated. Second and likewise, MM NOI-1 addresses only receivers at ground level but does not address elevated receivers. Furthermore, the SCEA does not recognize other nearby buildings, such as, for example, the Goya Studios Sound Stage or the hotel Mama Shelter Los Angeles, which could very well count as sensitive receptors and be impacted by the noise from the Project's construction.

Therefore, the SCEA should be revised and recirculated to account for the foregoing issues and potential construction and operational noise impacts individually and cumulatively with other related projects as defined by CEQA.

RESPONSE TO COMMENT 2A-10

The commenter states the proposed sound barriers would not reduce noise above the ground level and that the location of noise-control barriers was not disclosed. As stated in Mitigation Measure MM-N-3, "[t]he project contractor shall erect temporary noise-attenuating sound barriers along the northern and eastern perimeters of the Project Site fronting Venice Street and Hope Street, facing the nearest sensitive receptors. The sound barrier along the Venice Street frontage shall be designed to provide a minimum sound attenuation of -12.5 dBA. The sound barrier along Hope Street shall be designed to provide a minimum sound attenuation of -10 dBA." In addition to these fixed barriers, Mitigation Measure MM-N-4 requires the use of temporary portable acoustic barriers, partitions, or acoustic blankets to reduce noise during construction. These temporary portable barriers would allow the contractor to position barriers as necessary to block the line-of-sight from the sensitive receptors and the noise source and would effectively mitigate noise impacts at and above the grade level to less-than-significant levels.

The commenter's remark that the SCEA does not recognize the Goya Studios Sound Stage or the hotel Mama Shelter Los Angeles is inapplicable to the South Park Towers Project as these projects are located in the Hollywood community plan area, over 5 miles away from the Project Site.

COMMENT 2A-11

IV. THE CITY SHOULD IMPOSE TRAINING REQUIREMENTS FOR THE PROJECT'S CONSTRUCTION ACTIVITIES TO PREVENT COMMUNITY SPREAD OF COVID-19 AND OTHER INFECTIOUS DISEASES.

CEQA requires that an agency make a finding of significance when a Project may cause a significant adverse effect on human beings. Pub. Res. Code, § 21083, subd. (b)(3); CEQA Guidelines, § 15065, subd. (a)(4).

Public health risks related to construction work require a mandatory finding of significance under CEQA. Construction work has been defined as a lower- to high-risk activity for COVID-19 spread by the Occupations Safety and Health Administration. Recently, several construction sites have been identified as sources of community-wide spreads of COVID-19.

WSRCC recommends that the City adopt additional CEQA mitigation measures to mitigate public health risks from the Project's construction activities. WSRCC also requests that the City require safe on-site construction work practices as well as training and certification for any construction workers on the Project site.

In particular, and based upon its experience with safe construction site work practices, WSRCC recommends that the City require that while construction activities are being conducted at the Project Site:

Construction Site Design:

- The Project Site be limited to two controlled entry points.
- Entry points have temperature screening technicians taking temperature readings when the entry point is open.
- The Temperature Screening Site Plan shows details regarding access to the Project Site and Project Site logistics for conducting temperature screening.
- A 48-hour advance notice be provided to all trades prior to the first day of temperature screening.
- The perimeter fence directly adjacent to the entry points be clearly marked indicating the appropriate 6-foot social distancing position for when you approach the screening area. Please reference the Apex temperature screening site map for additional details.
- There be clear signage posted at the project site directing you through temperature screening.
- Provide hand washing stations throughout the construction site.

Testing Procedures:

- The temperature screenings used are non-contact devices.
- Temperature readings are not to be recorded.
- Personnel be screened upon entering the testing center and should only take one to two seconds per individual.
- Hard hats, head coverings, sweat, dirt, sunscreen, or any other cosmetics must be removed on the forehead before temperature screening.
- Anyone who refuses to submit to a temperature screening or does not answer the health screening questions be refused access to the Project Site.
- Screenings be performed at both entrances from 5:30 am to 7:30 am at the main gate and personnel gate.
- After 7:30 am, only the main gate entrance continues to be used for temperature testing for anybody gaining entry to the project site such as returning personnel, deliveries, and visitors.
- If the digital thermometer displays a temperature reading above 100.0 degrees Fahrenheit, a second reading will be taken to verify an accurate reading.
- If the second reading confirms an elevated temperature, DHS will instruct the individual that he/she will not be allowed to enter the Project Site. DHS will also instruct the individual to promptly notify his/her supervisor and human resources representative and provide them with a copy of Annex A.

Planning:

- Require the development of an Infectious Disease Preparedness and Response Plan that will include basic infection prevention measures (requiring the use of personal protection equipment), policies and procedures for prompt identification and isolation of sick

individuals, social distancing (prohibiting gatherings of no more than 10 people including all-hands meetings and all-hands lunches) communication and training and workplace controls that meet standards that may be promulgated by the Center for Disease Control, Occupational Safety and Health Administration, Cal/OSHA, California Department of Public Health or applicable local public health agencies.

The United Brotherhood of Carpenters and Carpenters International Training Fund has developed COVID-19 Training and Certification to ensure that Carpenter union members and apprentices conduct safe work practices. The City should require that all construction workers undergo COVID-19 Training and Certification before being allowed to conduct construction activities at the Project Site.

WSRCC has also developed a rigorous Infection Control Risk Assessment (ICRA) training program to ensure it delivers a workforce that understands how to identify and control infection risks by implementing protocols to protect themselves and all others during renovation and construction projects in healthcare environments. The ICRA protocols are intended to contain pathogens, control airflow, and protect patients during the construction, maintenance, and renovation of healthcare facilities. These protocols prevent cross-contamination, minimizing the risk of secondary infections in patients at hospital facilities. The City should require that the Project be built using a workforce trained in ICRA protocols.

RESPONSE TO COMMENT 2A-11

This comment states that the Project should include training requirements to address public health risks related to a potential risk of COVID-19 spread during construction of the Project. The comment incorrectly identifies public health risks associated with construction (e.g., a pandemic) as requiring a mandatory finding of significance under CEQA. COVID-19, not the Project, is an existing environmental condition that is causing substantial public health-related concerns. Under CEQA Guidelines Section 15065, public health risks from existing environmental conditions are not considered mandatory findings of significance and do not fall under any of the conditions defined as having a significant effect on the environment. The commenter does not provide evidence to support this statement.

Additionally, any workers who are employed for the construction of the Project would be protected by existing OSHA laws and regulations, which are required to address the potential spread of COVID-19 and to ensure worker safety during construction. OSHA is required to update policies to reflect standard operating procedures that follow the Centers for Disease Control (CDC), OSHA, State/territorial, and local guidelines for preventing the spread of COVID-19 infection, including providing training for employees on the spread of the disease in the geographic areas in which they work, and screening calls when scheduling indoor construction work to assess potential exposures and circumstances in the work environment, before worker entry.[17] As such, the

[17] OSHA, COVID-19 Control and Prevention, Construction Work, website: https://www.osha.gov/coronavirus/control-prevention/construction.

Project's compliance with updated OSHA regulations during construction would not exacerbate existing conditions related to COVID-19.

The comment speculates that COVID-19 would still be a relevant consideration at the time the Project's construction commences. However, these conditions are based on external factors and changing conditions that are outside the scope of the Project. Therefore, the commenter has not established a connection between the Project and the spread of COVID-19 and has not provided any evidence demonstrating that the Project would cause significant environmental impacts from public health risks or exacerbate existing public health risks related to COVID-19 during construction of the Project. Mitigation measures are only required for effects, which are found to be significant. See CEQA Guidelines § 15126.4(a)(3). As such, no mitigation measures are required here. The comment has been noted for the record and will be forwarded to the decision makers for their consideration.

COMMENT 2A-12

V. CONCLUSION.

In light of the aforementioned concerns, WSRCC respectfully requests that the City: (1) require a local and skilled workforce for the Project; (2) commission the preparation and circulation of a Project-specific Environmental Impact Report with a thorough analysis of the Project's cumulative impacts considering the several high-rise developments in the South Park neighborhood that have recently been planned, proposed, built, or approved; and, (3) order Applicant to revise the Project to ensure its consistency with all applicable laws and regulations. Should the City have any questions or concerns, it should feel free to contact my office.

Attached:

March 8, 2021, SWAPE Letter to Mitchell M. Tsai re Local Hire Requirements and Considerations for Greenhouse Gas Modeling (Exhibit A);
Air Quality and GHG Expert Paul Rosenfeld CV (Exhibit B);
Air Quality and GHG Expert Matt Hagemann CV (Exhibit C);
HI *Point Neighbors' Association v. City of Los Angeles* Ruling (Exhibit D).

RESPONSE TO COMMENT 2A-12

As discussed in Response to Comments 2A.1 through 2A.11, above, the commenter does not provide substantial evidence to support their assertions that the Project would result in any new significant impacts or that the Project requires the preparation of an EIR. Pursuant to CEQA Guidelines Section 15064(f)(5), substantial evidence includes fact, a reasonable assumption predicated upon fact, or expert opinion supported by fact. Substantial evidence is not argument, speculation, unsubstantiated opinion or narrative, evidence that is clearly inaccurate or erroneous, or evidence of social or economic impacts that do not contribute to, or are not caused by, physical impacts on the environment (PRC Section 21080(d) and (e)). Preparation of an EIR,

implementation of any additional mitigation measures, or recirculation of the SCEA is not required. No further analysis is required.

The comments provided in the attached Exhibit A (SWAPE letter dated March 8, 2021) are addressed in Response to Comment 2A.2, above. The curriculum vitae provided in Exhibits B and C and the case study cited in Exhibit D are included in the bracketed comments, attached. No specific responses are warranted for these materials.

COMMENT LETTER NO. 2B

Western States Regional Council of Carpenters (WSRCC)
Mitchell M. Tsai Law Firm
Mitchell M. Tsai, Esq.
139 South Hudson Avenue, Suite 200
Pasadena, CA 91101
November 29, 2023

COMMENT 2B-1

On behalf of the Western States Regional Council of Carpenters ("Western Carpenters" or "WSRCC"), my Office is submitting these comments regarding the City of Los Angeles' ("City") South Park Towers project (Case Nos. ENV-2018-3337-SCEA, CPC-2018-3336-SN-TDR-CUB-ZV-SPR-MSC, VTT-82213) ("Project").

WSRCC would like to express its support for this Project and withdraw their prior November 20, 2023 comment letter. After receiving clarification and further information about this Project, WSRCC believes this Project will benefit the environment and will be built utilizing protocols that will protect worker health and safety.

RESPONSE TO COMMENT 2B-1

The commenter rescinds their comments discussed in Comment Letter 2A, above. Nevertheless, responses to their comments were provided and concluded that the commenter does not provide substantial evidence to support their assertions that the Project would result in any new significant impacts or that the SCEA is required to be recirculated.

COMMENT LETTER NO. 1A

GK LAW

LAND USE, ENVIRONMENTAL & MUNICIPAL LAWYERS

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November 21, 2023

VIA EMAIL:

Rey Fukuda, City Planner
City of Los Angeles, Department of City Planning
rey.fukuda@lacity.org

RE: SCEA Comments on South Park Tower Project (DCP Case No. ENV-2018-3337-SCEA); Related DCP Case Nos. CPC-2018-3336-SN-TDR-CUB-SPR-MSC, VTT-82213

Dear Rey Fukuda and Department of City Planning ("**DCP**"):

On behalf of UNITE HERE Local 11 ("**Local 11**"), this office respectfully provides the following comments[1] to the City of Los Angeles ("**City**") regarding the Sustainable Communities Environmental Assessment ("**SCEA**")[2] for the proposed demolition of four commercial office/retail buildings at a 75,503 square-foot ("**sf**") site located at 1600 S. Flower St. ("**Site**") and the construction over 32 months of a two-tower, 452,630-sf mixed use development ("**Project**"), including: (i) a 22-story, 300-room hotel with ground floor restaurants on the western portion of the Site ("**Tower 1**"); and (ii) a 23-story, 250-dwelling unit residential building with 10,000-sf of ground floor medical offices on the eastern portion of the Site ("**Tower 2**").

In furtherance of the Project, Venice Hope Group, LLC ("**Applicant**") is seeking various project approvals under the Los Angeles Municipal Code ("**LAMC**" or "**Code**") under DCP Case No. CPC-2018-3336-SN-TDR-CUB-SPR-MSC, including: (a) Transfer of Floor Area Rights in the amount of 226,121 sf ("**TFAR**"); (b) alcohol-related Conditional Use Permit ("CUB"); (c) Site Plan Review for the 250 dwelling units and 300-room hotel ("**SPR**"); (d) Director's Determination to ten percent reduction in usable open space ("**DD**"); (e) a 20 percent decrease in the required parking for the hotel ("**MSC**"); and (f) to establish a new Sign District to permit offsite signage ("**SN**") (collectively "**Entitlements**"). (SCEA, pp. 6, 55.) Additionally, under DCP Case No. VTT-82213, the Applicant is seeking a Vesting Tentative Tract Map to create one ground lot and four airspace lots ("**VTTM**"). (Id.) Furthermore, for the purposes of the California Environmental Quality Act ("**CEQA**"),[3] the City is considering the adoption of the SCEA dated October 2023 ("**SCEA**").[2] 1A.1

In short, the SCEA has several defects, such as relying on outdated and seemingly inaccurate data. The reliance on poor data infects the SCEA's emissions modeling, which is central to the air quality and greenhouse gas ("**GHG**") analysis. Additionally, the SCEA relies on a vehicle mile traveled ("**VMT**") analysis that utilizes questionable modeling and thresholds. So too, the noise and vibration analyses are outdated and fail to consider multiple factors potentially masking construction and operational impacts. Furthermore, the Project fails to incorporate key sustainability strategies, such as LEED certification, CalGreen Tier 1 or 2 status, or adding any 1A.2

[1] Herein, page citations are either the stated pagination (i.e., "**p. #**") or PDF-page location (i.e., "**PDF p. #**")
[2] Inclusive of all associated appendices ("**APP-##**") retrieved from City-controlled website. (See https://planning.lacity.org/development-services/environmental-review/scea/south-park-tower-project).
[3] Including "**CEQA Guidelines**" codified at 14 Cal. Code. Regs. § 15000 et seq.

onsite solar. Also troubling is the deferred analysis and mitigation of potential exposure to hazardous vapor intrusion of tetrachloroethene ("**PCE**") and trichloroethene ("**TCE**"), which have been detected in soil vapor tests onsite, which should be addressed before the City approves the Project. Furthermore, the SCEA does not consider potential land use inconsistencies with the hotel-specific CUP requirement for all downtown hotels adopted by the City Council.

Collectively, these errors may conceal potentially significant Project impacts and allow for avoidance of additional mitigation measures to be included in the proposed Mitigation Monitoring Program ("**MMP**"), such as those identified in the Southern California Association of Governments ("**SCAG**") 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy ("**RTP/SCS**") Program Environmental Impact Report ("**PEIR**").[4] As such, the Project does not incorporate all feasible mitigation measures set forth in the 2020 RTP/SCS PEIR Mitigation Monitoring and Reporting Program ("**MMRP**"),[5] as is required for a SCEA. (See Pub. Res. Code § 21155.2(a).)

For these reasons, Local 11 respectfully asks the City to stay action on the Entitlements, VTT, and SCEA (collectively "**Project Approvals**") until the various errors are cured in a CEQA-compliant recirculated SCEA that incorporates additional mitigation, outlined in Section H below (see pages 31-35)

1A.2 cont.

I. LOCAL 11'S STANDING

Local 11 represents more than 25,000 workers employed in hotels, restaurants, airports, sports arenas, and convention centers throughout Southern California and Phoenix—including <u>*thousands of members who live and/or work in the City*</u>. The union has a First Amendment right to petition public officials in connection with matters of public concern, including compliance with applicable zoning rules and CEQA, just as developers, other community organizations, and individual residents do. Protecting its members' interest in the environment, including advocating for the environmental sustainability of development projects and ensuring the availability of housing and hotels (in compliance with state and local rules), is part of Local 11's core function. Recognizing unions' interest and union members' interest in these issues, California courts have consistently upheld unions' standing to litigate land use and environmental claims. (See *Bakersfield Citizens v. Bakersfield* (2004) 124 Cal.App.4th 1184, 1198.) Furthermore, Local 11 has public interest standing to challenge the Project Approvals given the City's public duty to comply with applicable zoning and CEQA laws, which Local 11 seeks to enforce. (See e.g., *Rialto Citizens for Responsible Growth v. City of Rialto* (2012) 208 Cal.App.4th 899, 914-916, n6; *La Mirada Avenue Neighborhood Assn. of Hollywood v. City of Los Angeles* (2018) 22 Cal.App.5th 1149, 1158-1159; *Weiss v. City of Los Angeles* (2016) 2 Cal.App.5th 194, 205-206; *Save the Plastic Bag Coalition v. City of Manhattan Beach* (2011) 52 Cal.4th 155, 166, 169–170.)

1A.3

II. SPECIFIC PROJECT/SCEA COMMENTS

Under "The Sustainable Communities and Climate Protection Act of 2008" ("**SB 375**"), lead agencies may prepare a streamlined CEQA clearance (i.e., SCEA) for qualifying transit priority projects ("**TPP**(s)") that are consistent with SCAG's RTP/SCS PEIR. To qualify, a proposed project must <u>*first*</u> meet the four TPP criteria and, <u>*second*</u>, must incorporate all feasible mitigation measures,

1A.4

[4] https://scag.ca.gov/sites/main/files/file-attachments/fpeir_connectsocal_complete.pdf?1607981618.
[5] https://scag.ca.gov/sites/main/files/file-attachments/exhibit-a_connectsocal_peir.pdf?1606004156.

performance standards, and criteria set forth under the RTP/SCS. (See Pub. Res. Code §§ 21155 & 21155.2; see also SCEA, pp. 2-3.) Project-level mitigation measures included in this PEIR's MMRP (or comparable measures) should be required by the local lead agency as appropriate and feasible. (MMRP, p. 1.) Here, the SCEA analysis suffers fundamental flaws that underestimate Project impacts and mask the need for additional project-level mitigation, which is required in order to utilize an SCEA. 1A.4 cont.

A. THE PROJECT DESCRIPTION, ENVIRONMENTAL SETTING, AND RELATED PROJECTS LIST NEED TO BE UPDATED

An "'accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR.'" (*San Joaquin Raptor Rescue Ctr. v. Cnty. of Merced* (2007) 149 Cal.App.4th 645, 654-655 [quoting *Cnty. of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 199] [emphasis in original].) As one court explained, "only through an accurate view of the project may affected outsiders and public decision-makers balance the proposal's benefit against its environmental cost, consider mitigation measures, assess the advantage of terminating the proposal (i.e., the 'no project' alternative), and weigh other alternatives in the balance." (*Citizens for a Sustainable Treasure Island v. City & Cnty. of San Francisco* (2014) 227 Cal.App.4th 1036, 1052.) Hence, an accurate project description is an "indispensable component of a valid EIR." *(Western Placer Citizens for an Agr. and Rural Env't v. Cnty. of Placer* (2006) 144 Cal.App.4th 890, 898.) Here, information in the SCEA seems dated, stale, or unclear, such as the following issues. 1A.5

1. The Construction Timeline Is Facially Inaccurate

SCEA claims that the 32-month construction will start in mid-2023. (SCEA, p. 51.) However, it is nearly 2024 and, thus, that statement is facially inaccurate. 1A.6

2. The Designated Construction Recycling Operator Is Likely Unavailable

The SCEA claims that construction debris would be transferred and recycled at Downtown Diversion. (Id. at PDF p. 60, 82, 161, 171, 385.) However, the operator's (Waste Management) lease at that property ends at the end of this year (2023), and it is not likely to operate in the near future, as known by the City's L.A. Sanitation and Environment, Solid Resources Citywide Recycling Division).[6] This assumption in the air/GHG emissions modeling under CalEEMod must be remedied. (SCEA, APP-A2, PDF p. 82.) 1A.7

3. The VMT Analysis Is Nearly Four Years Old

The SCEA relies on a VMT analysis conducted back in December 2019. (SCEA, APP-F1, PDF p. 16.) That was nearly four years ago, well before COVID shifted transit trends, and based on an older model utilized by the Los Angeles Department of Transportation ("**LADOT**") Transportation Assessment Guidelines ("**TAG**"),[7] commonly referred to as the City's "**VMT Calculator**" (updated most recently to VMT Calculator 1.4 in 2023).[8] This modeling needs to be updated. 1A.8

[6] Per emails with LA Sanitation and Environment, Solid Resources Citywide Recycling Division, which can be provided upon request.
[7] LADOT (Aug. 2022) TAG, https://drive.google.com/file/d/1hqmpAR_HIeB1gj4QK8ZEkSU1gqKO6BhZ/view.
[8] See https://ladot.lacity.org/businesses/development-review#transportation-assessment; see also LADOT (4/17/20) Pandemic-Related Updates to LADOT's Transportation Assessment Requirements, p. 2 (noting the

4. The Noise Measurements Are Outdated

The SCEA relies on ambient noise data acquired back in September 2018 and February 2019 (SCEA, APP-E, PDF pp. 4, 10) before COVID and the enduring prevalence of remote working. The increase of at-home workers has had the effect of reducing vehicles on the road (and its associated traffic noise contributing to ambient levels) and potentially increases residents' exposure to construction noise near their homes while they are working from home (therefore making day/hour restrictions less effective). 1A.9

5. The Excavated Material Assumptions Should Be Substantiated

The SCEA states that there will be only 28,000 cubic yards of excavated materials. (SCEA, pp. 161, 375.) This seems to assume no more than 10 feet below the grade of excavation at the approximate 75,500-sf Project Site to accommodate the subterranean parking levels under the two towers. (Id., at pp. 7, 21, 26, 255, 283, 285-286.) However, excavation and grading could reach as low as 25 feet below grade, if not lower. (SCEA, APP-B2, PDF pp. 16, 19, 22, 24, 38.) Underestimating excavation could lead to faulty air quality and GHG modeling, which relies on the assumed cubic yardage for construction haul trips. (SCEA, APP-A2, PDF pp. 75.) 1A.10

6. The Related Projects List May be Incomplete

The SCEA claims only nine related projects within one-quarter mile of the Project Site, associated with DCP case numbers dating back as old as 2008. (SCEA, pp. 52-54.[9]) However, it is unclear why only one-quarter mile was used as compared to a greater radius (e.g., 0.5 mile - 1.5 mile) as used in other City CEQA reviews,[10] similar to the Project's initial traffic analysis that identified 153 related projects back in late-2018 within 1.5 miles of the Project Site. (SCEA, APP-F2, pp. 53-54.) Additionally, it is unclear whether that information is based on applications submitted "through October 16, 2018" or biweekly case filings from "2020 to 2022[,]" which cannot be verified since source documents do not appear to be included in the SCEA or in the traffic appendix (Id., at p. 53; see also APP-F.1.) Moreover, it seems that several nearby projects were not included, such as the five projects listed on the DCP case filing map located roughly within the area enclosed by Pico Blvd., Washington Blvd., Main St. and the 110 Freeway.[11] Furthermore, based on the City's 1A.11

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anticipated revised 1.3 version to be release by June 2020), https://ladot.lacity.org/sites/default/files/documents/ladot-tag-pandemic-related-updates-april-17-2020_0.pdf.

[9] Associate DCP Case Nos. for Related Project No. 1 (ZA-2016-15-SPR-ZV-TDR, ENV-2016-16-MND); No. 2 (DIR-2014-1580-TDR-SPR, ENV-2014-1581-MND); No. 3 (CPC-2008-596-GPA-ZC-SPR, ENV-2008-386-MND); No. 4 (DIR-2017-4-TDR-SPR, ENV-2017-5-MND); No. 5 (DIR-2016-2476-TDR-SPR, ENV-2016-2477-MND); No. 6 (DIR-2019-1492-TDR-SPR, ENV-2019-1493-EAF); No. 7 (DIR-2017-5308-SPR, ENV-2017-5309-CE); No. 8 (DIR-2019-7676-TDR-TOC-SPR-WDI, ENV-2019-7677-CE); and No. 9 (DIR-2021-1011-TDR-TOC-SPR-WDI-VHCA, ENV-2021-1012-CE).

[10] See e.g., 400 San Vicente Project (Nov. 2023) SCEA, p. 2-35, https://planning.lacity.org/odocument/af988237-2143-427a-a7e5-90871d923fbf/SCEA.pdf; 1201 N. Gower Street (Sep. 2023) SCEA, p. 2-32, https://planning.lacity.org/odocument/b625f91f-10c9-484b-ab37-e06df4a4bedf/SCEA.pdf; 4th and Hewitt Project (May 2022) Draft EIR, pp. III-3 – III-12, https://planning.lacity.org/eir/4th-and-Hewitt/deir/HTML%20Files/images/DEIR_Sections/III._Env_Set.pdf.

[11] See DCP Case Filing Report Map (such as: (1) 5-story auto dealership [DCP Case Nos. DIR-2022-5446-SPR, ENV-2020-999-EAF]; (2) 9-story, auto dealership [DCP Case Nos. DIR-2022-8452-SPR, ENV-2022-8453-EAF]; (3) 667,878-sf new car dealership [DCP Case Nos. ADM-2021-781-CPIOC, DIR-2021-710-SPR, DIR-2020-998-SPR, ENV-2020-999-EAF]; (4) 7-story, 235-unit mixed use building [DCP Case Nos. ZA-2020-366-ZV, DIR-2017-1212-SPR, ENV-2017-1213-MND]; (5) 38-story, 775-room hotel [DCP Case Nos. DIR-2020-455-ACI,

geographic information system ("**ZIMAS**"), there are over 40,800 addresses and 670 unique DCP case numbers within 1500 feet of the Project Site, including 90+ DCP case filings exclusive of this Project and the above-described nine related projects (listed in the SCEA) and five nearby projects (not listed in the SCEA).[12] 1A.11 cont.

7. Existing Building Square Footage and Current Uses Need Clarification

The SCEA claims the existing Project Site includes four retail/office buildings totaling 89,510 square feet (see SCEA, Tbl. 2.1 [figure below left]), but ZIMAS indicates the four buildings total 60,573 square feet (see ZIMAS[13] [figure below right]). 1A.12

Address	Building Size (Square Feet)	Use
1600-1601 S. Flower Street	15,300	Retail
1616 S. Flower Street	15,000	Retail
1601-1611 S. Hope Street	43,710	Retail / Office [a]
1617 S. Hope Street	15,500	Retail
1623 S. Hope Street	-	Surface Parking
Total	89,510 sf	

Notes:
Sf = Square feet
[a] The existing uses within this building are comprised of approximately 1,799 square feet (sf) of office space and 41,911 square feet of retail space
Sources: http://zimas.lacity.org/,accessed February 2019; City of Los Angeles Department of Building and Safety, and O.K.O. Engineering, Inc., ALTA/ACSM Land Title Survey, November 1, 2012.

Building 1	
Year Built	1917
Building Square Footage	15,138.0 (sq ft)
Building 2	
Year Built	1960
Building Square Footage	16,880.0 (sq ft)
Building 3	
Year Built	1921
Building Square Footage	21,855.0 (sq ft)
Building 4	
Year Built	1947
Building Class	CX
Number of Units	0
Number of Bedrooms	0
Number of Bathrooms	0
Building 5	
Year Built	1962
Building Square Footage	6,700.0 (sq ft)

CPC-2016-2595-DA-CU-MCUP-CUX-SPR, ENV-2016-2594-EIR]), https://planning.lacity.org/resources/case-reports.

[12] ZIMAS (11/18/23) Case Number Report, PDF pp. 342 (including the following 90+ case filings: ADM-2019-4587-CPIOC, ADM-2019-6039-UDU, ADM-2019-7528-CPIOC, ADM-2020-1146-CPIOC, ADM-2020-1162-CPIOC, ADM-2021-10803-CPIOC, ADM-2021-1551-CPIOC, ADM-2022-4574-CPIOC, ADM-2023-133-CPIOC, ADM-2023-134-CPIOC, ADM-2023-2163-CPIOC, CPC-2016-4146-TDR-SPR, CPC-2016-4219-GPA-ZC, CPC-2016-4220-SN, CPC-2017-2107-MSC, CPC-2017-400-GPAJ-VZCJ-HD-VCU-TDR-SPR, CPC-2017-432-CPU, CPC-2017-746-HD-TDR-MCUP-ZAD-SPR-GPA-VZC, CPC-2017-747-DA, CPC-2018-6005-CA, CPC-2019-4572-VZC-HD-SPP-SPPA-SN, DIR-2016-1478-SPPA, DIR-2021-1714-SPP-SPPA, DIR-2021-4394-WDI, DIR-2023-2616-SPP, ENV-2017-2108-CE, ENV-2017-401-EAF, ENV-2017-433-EIR, ENV-2017-4648-CE, ENV-2017-748-EIR, ENV-2018-1263-CE, ENV-2018-2294-EIR, ENV-2018-6006-CE, ENV-2019-4121-ND, ENV-2023-1602-CE, ZA-2016-2593-CU-MCUP-CUX-SPR, ZA-2018-1262-ZV, ZA-2018-2293-MCUP-CUX-ZV-ZAD-SPR, ZA-2023-1601-CUB, CPC-2008-2363-GPA-ZC-HD-CU-CUB-ZV-SPR, CPC-2009-2677-SP-ZC-DA, CPC-2012-1665-TDR-ZV-SPR, CPC-2012-2311-DA, CPC-2013-910-GPA-SP-CA-MSC, CPC-2014-1915-SP, CPC-2014-1916-DA, DIR-2008-3545-SPR, DIR-2011-2633-TDR-SPR, DIR-2012-149-SPR, DIR-2012-1830-TDR-SPR, DIR-2013-2849-RV, DIR-2013-357-SPR, DIR-2013-359-SPR, DIR-2013-3921-SPR, DIR-2014-1795-SPPA-SPP, DIR-2015-2901-SPR, ENV-2008-1780-EIR, ENV-2008-1781-EIR, ENV-2008-2257-MND, ENV-2008-2271-MND, ENV-2008-3199-CE, ENV-2008-432-MND, ENV-2008-4505-ND, ENV-2009-2993-MND, ENV-2009-3285-CE, ENV-2010-1293-CE, ENV-2010-214-ND, ENV-2010-2279-CE, ENV-2010-3213-CE, ENV-2010-3407-MND, ENV-2011-1487-EIR, ENV-2011-2373-CE, ENV-2011-585-EIR, ENV-2012-1470-EIR, ENV-2012-150-MND, ENV-2012-1666-MND, ENV-2012-1831-MND, ENV-2012-3032-MND, ENV-2013-2850-CE, ENV-2013-3170-CE, ENV-2013-3392-CE, ENV-2013-358-MND, ENV-2013-3922-MND, ENV-2013-911-EIR, ENV-2014-4136-MND, ENV-2015-2902-MND, ENV-2016-3059-CE, ENV-2016-4147-EAF, ZA-2008-3286-ZV-SPR, ZA-2009-2992-CUB-CUX-CU, ZA-2010-3406-ZV, ZA-2012-3031-ZV, ZA-2014-4135-CUB, ZA-2017-4647-CU), https://zimas.lacity.org/reports/86ac2739367246b28b88e8cb98133057.pdf.

[13] https://zimas.lacity.org/?loc=MTI0LTVBMjA1ICA1Ngo1MTM0MDA4MDA2CjE2MTggUyBGTE9XRVIgU1QKCjY0Nzk0NzAuMzkxODM5NzAyLDE4MzQ3MjkuMjc1MTEyOTg1OSw2NDgyNDI2LjY0MTgzOTcwMSwxODM2Mjc1LjEwODQ0NjMxOTEKMTI0LTVBMjA1ICA1Ng%3D%3D.

The Applicant's SPR application states the buildings have 61,291 square feet of industrial uses (SPR Application,[14] p. 1 [see figure right]), similar to what the Phase I report conducted in September 2017, citing 68,273 sf of various uses (APP-D, PDF p. 7 [see figure below] & p. 871 [Phase II confirming 68,278-sf]).

PROJECT	NON-RESI (List each USE on
Uses ∋∋∋	Industrial
Existing Development	61,291
Demolition (&)	61,291
New Construction (%)	13,120
Net Change (∀)	-48,171
Total Project	13,120

1A.12 cont.

Additionally, it appears that the Applicant purchased the Site back in December 2017,[15] the Project applications were filed in June 2018,[16] and renderings have not changed since that time.[17] Furthermore, based on Google Street images, the building seems to have experienced long vacancies since June 2018, with little signs of activity in the front or back of the properties. Hence, it would seem that the Site has potentially been relatively inactive for more than five years.

> Boulevard immediately north of the Santa Monica Freeway, between South Hope Street and South Flower Street, in the City of Los Angeles. The subject property is approximately 1.73 acres in size and is occupied by six industrial structures, separated into three buildings on each half of the subject property, that are approximately 68,273 square feet in total size. The buildings are currently occupied by multiple tenants, including Bibrey/Angelina, a carpenter's shop and mural art studio (1601 South Hope Street), Steps Sportswear, a clothes warehouse and t-shirt silk screening operation (1611 South Hope Street), Hua Chen, an art studio (1611 B South Hope Street), Juan Rosillo, an art studio (1611 C South Hope Street), Create Now, a non-profit organization's office (1611 E South Hope Street), Boehme, an architect's office (1611 South Hope Street), Tri Star Sample Co. (1611 Basement South Hope Street) and Eastern Fabrications, a motor cycle fabrication shop (1625 South Hope Street) on the eastern half; and Sassy & Classy, a cloth cutting operation (1600 South Flower Street), Evolve, a clothes warehouse (1606 South Flower Street) and International Private Label, a clothes warehouse (1616 South Flower Street), on the western half. The remaining portions of the property consist of asphalt paved areas on the southern and southeastern portions and central alleyway portion, with minimal parking in the southeast portion and ample rooftop parking on the southwest building. The surrounding area is used for commercial purposes. Groundwater is estimated to be in excess of 100-feet below ground surface in the area of the site and is assumed to flow towards the southwest

1A.13

In sum, the SCEA must be recirculated to include an updated analysis utilizing current and accurate information. This is critical given that the above-described data defects infect numerous other sections of the SCEA (discussed below).

/ / /

[14] https://planning.lacity.org/pdiscaseinfo/document/NDgxMTI0/6d189c69-33a8-4be1-9414-6b0ce5c25431/esubmit.
[15] TFAR Application, p. 3, https://planning.lacity.org/pdiscaseinfo/document/NDgxMDk0/6d189c69-33a8-4be1-9414-6b0ce5c25431/esubmit.
[16] See DCP Case Summary & Documents, https://planning.lacity.org/pdiscaseinfo/search/encoded/MjIxNzEw0.
[17] UrbanizeLA (6/12/18) Two-Tower Development Proposed in South Park (showing same renderings as SCEA Fig. 2.18), https://la.urbanize.city/post/two-tower-development-proposed-south-park.

B. THE SCEA'S AIR QUALITY & GHG ANALYSIS IS FUNDAMENTALLY FLAWED

Air quality impacts and their concomitant impacts on human health must be studied in CEQA documents. (See *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184, 1220 [quoting CEQA Guidelines § 15126.2(a)].) So too, the California Supreme Court demands a robust GHG analysis to assess a project's impact on climate change. Lead agencies must provide "the contours of their logical argument," leaving no "analytical gaps" in the analysis, and supporting determinations "through substantial evidence and reasoned explanation." (*Center for Biological Diversity v. Cal. Dept. of Fish and Wildlife* ("***Newhall Ranch***") (2015) 62 Cal.4th 204, 227; see also *Cleveland National Forest Foundation v. San Diego Assn. of Governments* ("***Cleveland II***") (2017) 3 Cal.5th 497, 504, 519 [analysis must be "based to the extent possible on scientific and factual data … stay[ing] in step with evolving scientific knowledge and state regulatory schemes." (Quoting CEQA Guidelines § 15064(b)].) This analysis must include good faith efforts to disclose a project's anticipated emissions and consider consistency with the State's GHG reduction requirements, such as: reduce to 1990 GHG emission levels by 2020 (i.e., AB 32); 40 percent below 1990 levels by 2030 (i.e., SB 32); and 80 percent below 1990 levels by 2050 (i.e., Executive Order S-3-05). (See CEQA Guidelines § 15064.4.) Here, the SCEA suffers several analytical flaws that fail to provide a good faith effort on air quality and GHG impacts.

1A.14

1. Emission Model Is Infected by Outdated and Potentially Inaccurate Information

The SCEA's air quality and GHG impacts rely on the emissions modeling via CalEEMod. (SCEA, p. 157, 165, 204, 226.) However, this model relies on the accuracy of input information, such as construction timeline and equipment, VMT estimates, amount of excavated material, and the size/use of current uses (to name a few). (APP-A2, pp. 4, 69-72, 75, 82.) However, as discussed above, much of this data here seems inaccurate and dated. Particularly problematic is the disparity of information used for the existing Site conditions, such as: (i) the SCEA claims there is 89,510-sf of *primarily retail* and only *1,799-sf office* (SCEA, Tbl. 2.1); (ii) ZIMAS reports only 60,573 square feet;[18] (iii) Applicant's application states 61,291-sf industrial uses (SPR Application,[19] p. 1); and (iv) the Phase I states 68,273 square feet of different uses (APP-D, PDF p. 7). However, the CalEEMod used 87,731-sf office with 1,779-sf regional shopping center uses. (APP-A1, p. 4 [see excerpt below].) Putting aside the questionable overall size of the existing square footage, the office space was supposed to be 1,799 sf (not 87,731 sf). Furthermore, given the type of businesses listed in the Phase I, there is no justification to consider the existing retail uses to be a regional shopping center that is owned and managed as a single large operator (e.g., Costco, Walmart, Ikea, etc.).[20]

1A.15

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)
General Office Building	88.0	1000sqft	1.73	87,731
Regional Shopping Center	2.00	1000sqft	0.00	1,779

[18] https://zimas.lacity.org/?loc=MTI0LTVBMjA1ICA1Ngo1MTM0MDA4MDA2CjE2MTggUyBGTE9XRVIgU1QKCjY0Nzk0NzAuMzkxODM5NzAyLDE4MzQ3MjkuMjc1MTEyOTg1OSw2NDgyNDI2LjY0MTgzOTcwMSwxODM2Mjc1LjEwODQ0NjMxOTEKMTI0LTVBMjA1ICA1Ng%3D%3D.

[19] https://planning.lacity.org/pdiscaseinfo/document/NDgxMTI0/6d189c69-33a8-4be1-9414-6b0ce5c25431/esubmit.

[20] See CalEEMod User Guide (Apr. 2022), p. 28, https://www.caleemod.com/documents/user-guide/01_User%20Guide.pdf.

Ultimately, the flawed data inputs infect the entire emissions modeling and, therefore, any resulting air quality and GHG conclusions are similarly flawed. This must be cured in a revised analysis utilizing accurate data. 1A.15 cont.

2. Sustainable Features Are Overblown

Here, the SCEA suggests the Project is sustainable primarily based on the Project's compliance with existing regulations (e.g., South Coast Air Quality Management District, LA Building Codes, CalGreen, Title 24, etc.) However, the Project's purported sustainability features are overblown, considering the following measures are not incorporated into this Project:

- No solar panels or renewable energy generation is being provided onsite;
- The Project is not seeking any type of LEED certification;
- The Project is not seeking Tier 1 or Tier 2 status under CalGreen Codes;
- The SCEA provides scant information about or commits to any concrete details about the purported TDM promotions or rideshare program (SCEA, p. 393);
- Provides 228 residential parking spaces (SCEA, pp. 42, 299), which is overparked, given AB 2097 removes parking minimum for projects within one-half mile of public transit;[21]
- Has no commitment to specific Energy Star (or equivalent) appliances for the Project's commercial/hotel operations,[22] which has significant electricity usage stemming from commercial refrigerators, cooling and heating the building;[23]
- Considers no hotel-specific recycling program that addresses the acute issues facing hotels, which generate higher than average waste per employee than other business, with 65 percent coming comprised of food waste, mixed paper, and mixed plastics;[24]
- Does not address any Project-specifics as it relates to the State's organic waste collection regulations that cover both multi-family and commercial developments (i.e., SB 1383),[25] the City's comprehensive Plastic Reduction Program,[26] or the City's Expanded Polystyrene (Styrofoam) Ban Ordinance;[27] and
- Removes seven existing street trees (SCEA, p. 160).

1A.16

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[21] https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220AB2097.
[22] See e.g., Energy Star Commercial Refrigerators & Freezers, https://www.energystar.gov/products/commercial_refrigerators_freezers; see also California Air Pollution Control Officers Association ("**CAPCOA**") (Aug. 2010) Quantifying GHG Mitigation Measures, pp. 351, D-2 (listing ENERGY STAR commercial dishwashers and commercial refrigerators as mitigation strategy), https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/C03.pdf; Hollywood Center Project (Apr. 2020) DEIR, p. ES-63 (committing to ENERGY STAR Certified Commercial Clothes Washers as project design feature), https://planning.lacity.org/eir/HollywoodCenter/deir/Draft%20EIR%20Sections/ES.%20Executive%20Summary.pdf.
[23] CAPCOA (Dec. 2021) Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity, PDF pp. 673, 721 (EDFZ zone 17 [LADOT inland]), https://www.caleemod.com/documents/handbook/full_handbook.pdf.
[24] Ibid., PDF pp. 734-735.
[25] CalRecycle, FAQs about Implementing SB1383, https://calrecycle.ca.gov/organics/slcp/faq/.
[26] See e.g., LASAN, https://www.lacitysan.org/san/faces/home/portal/s-lsh-es/s-lsh-es-ceqap/s-lsh-es-ceqap-cprp?_afrLoop=17412585950244979&_afrWindowMode=0&_afrWindowId=null&_adf.ctrl-state=bxg5fpc84_1#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D17412585950244979%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dbxg5fpc84_5;
[27] Council File No. 21-0064, Ord Nos. 187716-718, https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=21-0064.

Also missing from the SCEA is any reference to SB 1383, much less any specific requirement in furtherance of the organic waste collection services necessary to help meet the State's GHG reduction goals, according to the California Air Resources Board ("**CARB**").[28] The SCEA fails to discuss any specific feasible measures that could be implemented on the entire Project Site, such as: setting up a food recovery program that could establish economies of scale for the entire Site; establishing a local community composting area; requiring outside composting bins or residential composting devices (commonly referred as "foodcyclers") at each residential unit;[29] establish Site-wide organics waste collection that could then be leveraged as feedstock to a future anaerobic digestion facility; or require a portion of the Site to be served by SB1383 byproducts on site (e.g., compost, biogas, etc.).[30] 1A.17

3. Quantitative Analysis Lacking and Improper Rejection of SCAQMD Thresholds

The SCEA refuses to use any numeric threshold and rejects the use of South Coast Air Quality Management District ("**SCAQMD**") multi-tier GHG thresholds[31] because they purportedly were "not formally adopted." (SCEA, pp. 247-278, 255.) This reasoning lacks substantial evidence given the City has used SCAQMD GHG thresholds numerous times, including Tier 3 Screening threshold of 1,400 metric tons of CO2 equivalent per year ("**MTCO2e/yr**") for commercial projects,[32] 3,000 MTCO2e/yr for mixed-use projects or non-industrial projects,[33] 3,500 MTCO2e/yr 1A.18

[28] See CARB (Dec. 2022) 2022 Scoping Plan, pp. 44, 79, 117, 223-224, https://ww2.arb.ca.gov/sites/default/files/2023-04/2022-sp.pdf.
[29] See e.g., https://www.nytimes.com/wirecutter/guides/how-to-start-composting/; https://www.whygoodnature.com/blog/reducing-food-waste-with-the-vitamix-foodcycler#:~:text=Some%20people%20just%20keep%20their,how%20long%20compost%20bins%20take; https://foodcycler.com/.
[30] See e.g., https://calrecycle.ca.gov/organics/slcp/capacityplanning/recycling/; https://calrecycle.ca.gov/organics/slcp/; https://ww2.arb.ca.gov/our-work/programs/slcp/resources.
[31] See SCAQMD (Oct. 2008) Draft Guidance Document – Interim CEQA GHG Significance Threshold, pp. 3-10 – 3-16, http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgattachmente.pdf; see also SCAQMD (12/5/08) Board Letter, p. 5, http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgboardsynopsis.pdf?sfvrsn=2; SCAQMD (9/28/10) Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group # 15, http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-minutes.pdf.
[32] See e.g., DCP Case No. ENV-2017-3855 (Oct. 2018) MND, PDF pp. 49-50, https://planning.lacity.org/odocument/423baae0-300e-476d-add1-70364bb43d09/ENV-2017-3855.pdf.
[33] See e.g., DCP Case No. ENV-2017-4170 (Dec. 2018) MND, PDF pp. 112-114, https://planning.lacity.org/odocument/03048272-13c8-4ed5-9331-01c45f38396f/ENV-2017-4170.pdf; DCP Case No. ENV-2015-897 (Jan. 2016) Initial Study, PDF pp. 89-91, http://planning.lacity.org/eir/nops/333LaCienega/is.pdf; DCP Case No. ENV-2016-1604 (Apr. 2017) MND, PDF pp. 86-87, https://planning.lacity.org/staffrpt/mnd/Pub_033017/ENV-2016-1604.pdf; DCP Case No. ENV-2017-3896 (Dec. 2018) MND, PDF pp. 41, https://planning.lacity.org/odocument/77719943-bf70-4633-bc5d-19ad5c7f8a39/ENV-2017-3896.pdf; DCP Case No. ENV-2016-1367-EIR (1/1/17) IS, PDF pp. 87-88, https://planning.lacity.org/eir/EdinburghAve/DEIR/Appendix%20A%20-%20NOP%20IS%20and%20Comment%20Letters.pdf; DCP Case No. ENV-2016-2384 (Jan. 2018) MND, PDF pp. 101-103, https://clkrep.lacity.org/onlinedocs/2018/18-0827_misc_1_08-28-2018.0001.pdf; Bureau of Engineering ("**BOE**") W.O. E1908381 (3/13/19) CE, PDF pp. 4, 18, https://clkrep.lacity.org/onlinedocs/2018/18-0392_rpt_BOE_03-13-2019.pdf; Council File ("**CF**") No. 18-0392 project (3/13/19) CE, PDF pp. 547, 578, https://clkrep.lacity.org/onlinedocs/2018/18-0392_rpt_BOE_03-13-2019.pdf; DCP Case No. ENV-2014-4288 (Oct. 2015) DEIR, PDF pp. 31-32, https://planning.lacity.org/eir/5750HollywoodBlvd/DEIR/4.C_Greenhouse_Gas_Emissions.pdf; DCP Case No. ENV-2016-1662 (Jun. 2017) DEIR, PDF p. 50, https://planning.lacity.org/eir/ProvidenceTarzanaMedicalCtr/Deir/files/D_IVD.pdf; DCP Case No. ENV-2017-628 (2/6/19) MND, PDF pp. 72-73, https://planning.lacity.org/odocument/64056bf9-

e4b7-4085-b33f-89ced0b9dac5/ENV-2017-628.pdf; DCP Case No. ENV-2019-6290 (Feb. 2021) MND, PDF pp. 114-115, https://planning.lacity.org/odocument/7cb38074-68db-4b01-b2bd-cb2034240cd5/ENV-2019-6290.pdf; DCP Case No. ENV-2020-5838 (Jul. 2021) NegDec, PDF p. 106, https://planning.lacity.org/odocument/6dd1558c-675d-46dd-85a3-cfa19e776b30/ENV-2020-5838.pdf; DCP Case No. ENV-2019-5520-MND (Jul. 2021) IS, PDF pp. 84-85, https://planning.lacity.org/odocument/37473b1c-89af-485c-a16b-1db96fb4b9c4/ENV-2019-5520.pdf; DCP Case No. ENV-2020-6951 (Aug. 2021) MND, PDF p. 55, https://planning.lacity.org/odocument/85a03721-39db-4b70-9078-f7220c76f336/ENV-2020-6951.pdf; ENV-2017-3972 (Sep. 2021) Subsequent MND, PDF pp. 82-85, https://planning.lacity.org/odocument/b718e33a-4781-437f-a2a9-194d28bf36e4/ENV-2017-3972.pdf; Case No. ENV-2020-2497 (Apr. 2020) SCEA, PDF p. 72, https://planning.lacity.org/odocument/eb7f30da-32a8-4c66-810b-49d3431a1473/6._Sustainable_Communities_Environmental_Analysis.pdf; ENV-2019-2314 (Mar. 2020) SCEA, PDF pp. 35-37, https://planning.lacity.org/odocument/2b972b78-9efa-4bc9-9b38-e6adcb55efc1/VI_Sustainable_Communities_Environmental_Analysis.pdf; Case No. ENV-2018-5594 (Sep. 2019) SCEA, PDF pp. 57-58, https://planning.lacity.org/eir/sceas/documents/thatcheryard/V.%20SCEA%20Initial%20Study%20Checklist.pdf; Case No. ENV-2015-4131 (Sep. 2019) MND, PDF p. 63, https://planning.lacity.org/odocument/f809dc18-39a9-4874-8f39-9b2bcd43a8db/ENV-2015-4131.pdf; Case No. ENV-2019-7321 (Oct. 2020) MND, PDF p. 51, https://planning.lacity.org/odocument/001ce94f-037b-42cb-a1c6-a79939b171a6/ENV-2019-7321.pdf; Case No. ENV-2014-3179 (Mar. 2020) MND, PDF p. 59, https://planning.lacity.org/odocument/12c43f0f-86dc-4932-b385-4fb33e8a211d/ENV-2014-3179.pdf; Case No. ENV-2019-1065 (Aug 2019) MND, PDF pp. 33-34, https://planning.lacity.org/odocument/30b4f3bc-b498-4392-81c4-164f92c94b38/ENV-2019-1065.pdf; Case No. ENV-2019-0686 (May 2019) MND, PDF p. 41, https://planning.lacity.org/odocument/1e701bbd-6286-425e-99af-e1bea3861173/ENV-2019-686.pdf and Appendix B, PDF p. 10, https://planning.lacity.org/odocument/83cc6338-cd86-43b9-9a6f-b0d4b3178e00/ENV-2019-686-B.pdf; Case No. ENV-2018-7122 (May 2019) MND, PDF p. 42, https://planning.lacity.org/odocument/a0a072c7-6a41-4204-b52f-596f704d1e8c/ENV-2018-7112.pdf and Appendix B, PDF p. 21, https://planning.lacity.org/odocument/3df9f721-f978-47c2-8bca-0d721c35b3b2/ENV-2018-7112-B.pdf; Case No. ENV-2017-613 (May 2019) MND, PDF p. 42, https://planning.lacity.org/odocument/6fbd4854-fd37-4f50-bd30-c813dff9a747/ENV-2017-613.pdf and Appendix A, PDF pp. 4-5, https://planning.lacity.org/odocument/aba55507-7fd6-49ff-abb1-4e7045a583a2/ENV-2017-613-A.pdf; Case No. ENV-2017-713 (Aug. 2019) MND, PDF p. 74, https://planning.lacity.org/odocument/b50b48c4-d6f8-4a83-9e0d-3a488b26b524/ENV-2017-713.pdf; Case No. ENV-2019-5436 (Oct. 2019) MND, PDF p. 50, https://planning.lacity.org/odocument/319eeb30-cc17-455f-b322-8d0eb498fc4c/ENV-2019-5436.pdf; Case No. ENV-2019-3845 (Oct. 2019) MND, PDF pp. 41-42, https://planning.lacity.org/odocument/2ad7c32a-9ae9-4ee1-ace0-2c33f991b052/ENV-2019-3845.pdf; Case No. ENV-2019-4650 (Oct. 2019) MND, PDF pp. 86-87, https://planning.lacity.org/odocument/70edaa4e-52c0-4bdb-9960-f798e74b9dea/ENV-2019-4650.pdf; Case No. ENV-2015-4630 (Aug. 2018) DEIR, PDF p. 25, https://planning.lacity.org/eir/1375_St_Andrews_Apts/DEIR/DEIR%20Sections/IV.F.%20Greenhouse%20Gas%20Emissions%20(1375%20St%20Andrews)%20Public%20Review.pdf; Case No. ENV-2015-3603 (Jan. 2018) DEIR, PDF p. 53, https://planning.lacity.org/eir/6200WestSunset/Deir/files/D_IVD.pdf; Case No. ENV-2015-1853 (Jun. 2016) DEIR, PDF pp. 8, 12, https://planning.lacity.org/eir/Clarendon/DEIR/files/DEIR/4_2%20DEIR%20GHG.pdf; DCP Case No. ENV-2014-3995 (Feb. 2016) DEIR, PDF p. 16, https://planning.lacity.org/eir/andorasubdivision/DEIR/DEIR/12_IV.F_GHG.pdf.

for residential projects,[34] or 10,000 MTCO2e/yr threshold for industrial projects,[35] or other similar bright-line thresholds.[36] So too, the City has relied on the use of SCAQMD's Tier 4 performance standards of 4.8 (2020 year) and 3.0 (2035 year) $MTCO_2e$/yr per service population (i.e., residents and employees) or similar efficiency standards.[37] 1A.18 cont.

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[34] See e.g., DCP Case No. ENV-2014-1988-EIR (10/14/16) Initial Study, PDF pp. 125-126, https://planning.lacity.org/eir/1209_6thAve/Deir/DEIR%20Appendices/Appendix%20A%20-%20NOP-IS.pdf; Case No. ENV-2016-3175 (Jan. 2019) MND, PDF pp. 102, 106, https://planning.lacity.org/odocument/683fac98-73b6-4486-8c04-de68be571576/ENV-2016-3175.pdf; Case No. ENV-2016-4267 (Sep. 2019) MND, PDF pp. 149-151, https://planning.lacity.org/odocument/322a1b09-58a8-481c-bcd3-9adc206aa28f/ENV-2016-4267.pdf; Case No. ENV-2015-1193 (Jun. 2016) DEIR, PDF pp. 39, 52, https://planning.lacity.org/eir/McCadden/DEIR/files/D_IVC.pdf.

[35] See e.g., DCP Case No. ENV-2017-1015-MND (2/8/18) PDF pp. 182, 220, 222, http://planning.lacity.org/StaffRpt/InitialRpts/CPC-2017-1014.PDF; Case No. ENV-2013-015 (Feb. 2016) Recirculated DEIR, PDF pp. 26, 34, https://planning.lacity.org/eir/Harvard_WestLake/DEIRrecirculated/Chapters/3.2%20Air%20Quality%20RDEIR.pdf; BOE W.O. E1904503 (1/29/15) IS/MND, PDF p. 34, http://clkrep.lacity.org/onlinedocs/2014/14-0106_misc_w_5-7-15.pdf; Los Angeles World Airport ("**LAWA**") project EIR-17-002-AD (Feb. 2017) DEIR, PDF pp. 141, http://clkrep.lacity.org/onlinedocs/2017/17-0836_misc_11_07-26-2017.pdf; LAWA project NG-10-404-AD (Feb. 2011) Final NegDec, PDF p. 87, http://clkrep.lacity.org/onlinedocs/2011/11-1518_rpt_bac_8-30-2011.pdf; LAWA project NG-16-275-AD (Nov. 2016) IS/MND, PDF pp. 72-73, http://clkrep.lacity.org/onlinedocs/2017/17-0017_misc_5_01-13-2017.pdf; BOE W.O. No. E1401293 (2/22/18) IS, PDF p. 18, http://clkrep.lacity.org/onlinedocs/2017/17-0504_misc_2_03-27-2018.pdf; DCP Case No. ENV-2017-1015 (11/22/17) IS, PDF pp. 81-82, 182, http://clkrep.lacity.org/onlinedocs/2018/18-0279_misc_5_04-04-2018.pdf; BOE W.O. E170093B (10/17/11) IS, PDF p. 31, http://clkrep.lacity.org/onlinedocs/2012/12-0114_misc.pdf; BOE W.O. 1906869 (Jul. 2009) IS, PDF p. 45, http://clkrep.lacity.org/onlinedocs/2009/09-2458_misc_4-1-16.pdf; DCP Case No. ENV-2018-4247 (01/18/19) MND, PDF pp. 89-91, https://planning.lacity.org/staffrpt/mnd/Pub_012419/ENV-2018-4247.pdf.

[36] See e.g., BOE Bending the River Back into the City Project (Jan. 2014) IS/MND, PDF pp. 34-35 (CAPCOA's 900 MTCO2e/yr), https://clkrep.lacity.org/onlinedocs/2014/14-0254_misc_a_2-24-14.pdf.

[37] See e.g., DCP Case No. ENV-2016-1951 (Apr. 2018) DEIR, PDF pp. 40, 53-54, https://planning.lacity.org/eir/Fig_and_8th/DEIR/files/D_IVC.pdf & GHG Appendix, PDF pp. 18-20, https://planning.lacity.org/eir/Fig_and_8th/DEIR/files/App_C.pdf; DCP Case No. ENV-2016-3909 (Apr. 2018), DEIR, PDF pp. 38-40, 75, https://planning.lacity.org/eir/Promenade_2035/DEIR/files/D_IVD.pdf; DCP Case No. ENV-2015-244 (Oct. 2016) DEIR, PDF p. 139, https://planning.lacity.org/eir/sunwest/DEIR/DEIR%20Sections/DEIR%20SunWest_Sections%20Compiled.pdf; DCP Case No. ENV-2016-3177 (Feb. 2020) DEIR, PDF pp. 45-46, https://planning.lacity.org/eir/Hollywood_and_Wilcox/deir/files/D.IV.E.pdf and Appendix C, PDF pp. 62-65, https://planning.lacity.org/eir/Hollywood_and_Wilcox/deir/files/Appendix_C.pdf; DCP Case No. ENV-2014-1362 (Jul. 2016) DEIR, PDF pp. 52-53, https://planning.lacity.org/eir/ICONshermanOaks/DEIR/files/D_IVC.pdf; DCP Case No. ENV-2016-3576 (Sep. 2017) DEIR, PDF p. 23, https://planning.lacity.org/eir/668SoAlamedaStreet/Deir/4.5%20Greenhouse%20Gas%20Emissions.pdf; DCP Case No. ENV-2016-4889 (Jun. 2018) DEIR, PDF pp. 53-53, https://planning.lacity.org/eir/1001_Olympic/deir/DEIR%20Sections/IV.F%20GHG.pdf and Appendix E, PDF pp. 220-221, https://planning.lacity.org/eir/1001_Olympic/deir/DEIR%20Appendices/E-1%20-%20AQ%20and%20GHG%20Modeling.pdf; DCP Case No. ENV-2016-4313 (Dec. 2016) MND, PDF pp. 136-137, http://clkrep.lacity.org/onlinedocs/2008/08-0887-S1_misc_7_02-22-2017.pdf; DCP Case No. ENV-2016-4394) MND, PDF pp. 164-165, https://planning.lacity.org/odocument/42685ced-64ab-4c78-9f70-f5f63f805823/ENV-2016-4394.pdf; DCP Case No. ENV-2008-1421 (Oct. 2015) Addendum to Certified EIR, PDF pp. 28-31, http://clkrep.lacity.org/onlinedocs/2016/16-0033_misc_1_01-08-2016.0001.pdf; DCP Case No. ENV-2008-1773 (Sep. 2015) DEIR, PDF pp. 23-25, http://planning.lacity.org/eir/theReef/deir/DEIR%20Sections/IV.G.%20Greenhouse%20Gases.pdf; DCP Case No. ENV-2013-194 (Feb. 2014) DEIR, PDF pp. 17-19, https://planning.lacity.org/eir/MuseumSquare/DEIR/DEIR%20Sections/IV.E.%20Greenhouse%20Gases_Global%20Climate%20Change.pdf.

4. Project Exceeds Both Tier 3 and Tier 4 SCAQMD Thresholds

Here, the Project exceeds SCAQMD thresholds. As summarized in SCEA Table 4.12 (p. 257), the entire Project Site currently generates a total of 1,387 MTCO2e/yr, as compared to the 4,415 MTCO2e/yr once the proposed Project is constructed (i.e., Project emissions), which amounts to a 3,028 MTCO2e/yr net increase in emissions. These emissions exceed SCAQMD's tier 3 bright-line screening threshold of 3,000 MTCO2e/yr that the City routinely uses (discussed supra). Furthermore, when dividing the Project's annual GHG emissions (i.e., 4,415 MTCO2e/yr) by its 755-service population ("**sp**") (i.e., 563 residents + 192 employees) (SCEA, pp. 326-327), the Project achieves an efficiency level of 5.84 MTCO2e/yr/sp—which exceeds SCAQMD's tier 4 efficiency standard of 3.0 MTCO2e/yr/sp for year 2035 (discussed supra). Exceeding SCAQMD thresholds may be substantial evidence of a significant impact requiring mitigation. (See e.g., *IBC Business Owners for Sensible Development v. City of Irvine* (2023) 88 Cal.App.5th 100, 130.)

1A.19

5. Failing to Apply Efficiency Threshold is Not Consistent with Evolving Standards

Despite being proposed prior to the State's adoption of more aggressive GHG reduction goals of 40 percent 1990 levels by 2030 (i.e., SB 32 and Executive Order B-30-15), SCAQMD's screening/efficiency thresholds are akin to and most consistent with bright-line/efficiency thresholds adopted by numerous other air districts in recent years, including Sacramento Metropolitan AQMD,[38] Bay Area AQMD,[39] Placer County APCD,[40] and San Luis Obispo County APCD.[41] Similarly, the Association of Environmental Professionals ("**AEP**") has proposed a 2030 land-use efficiency threshold of 2.6 MTCO2e/yr/sp based on SB 32 mid-term GHG reduction goals

1A.20

[38] SMAQMD (May 2018) Guide to Air Quality Assessment in Sacramento County, pp. 6:1-3, 6:10-12 ("(GHG) emissions adversely affect the environment through contributing, on a cumulative basis, to global climate change … *the District recommends that lead agencies address the impacts of climate change on a proposed project and its ability to adapt to these changes in CEQA documents* … [thus urging] evaluating whether the GHG emissions associated with a proposed project will be responsible for making a cumulatively considerable contribution to global climate change."[emphasis original]), http://www.airquality.org/LandUseTransportation/Documents/Ch6GHGFinal5-2018.pdf; see also SMAQMD Thresholds of Significance Table, http://www.airquality.org/LandUseTransportation/Documents/CH2ThresholdsTable5-2015.pdf.

[39] BAAQMD (May 2017) CEQA Air Quality Guidelines, p. 2:1-4 ("No single project could generate enough GHG emissions to noticeably change the global average temperature [but rather] [t]he combination of GHG emissions from past, present, and future projects contribute substantially to the phenomenon of global climate change and its associated environmental impacts."), http://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en.

[40] PCAPCD (Oct. 2016) CEQA thresholds of Significance Justification Report, pp. E-2, 2, 17-22 ("CEQA requires that the lead agency review not only a project's direct effects on the environment, but also the cumulative impacts of a project and other projects causing related impacts. When the incremental effect of a project is cumulatively considerable, the lead agency must discuss the cumulative impacts in an EIR. [citing CEQA Guidelines § 15064]"), https://www.placer.ca.gov/DocumentCenter/View/2061/Threshold-Justification-Report-PDF; see also PCAPCD (11/21/17) CEQA Thresholds and Review Principles, http://www.placerair.org/landuseandceqa/ceqathresholdsandreviewprinciples.

[41] SLOAPCD (Mar. 28, 2012) GHG Threshold and Supporting Evidence, pp. 5, 25-30, 42 ("No single land use project could generate enough GHG emissions to noticeably change the global average temperature. Cumulative GHG emissions, however, contribute to global climate change and its significant adverse environmental impacts. Thus, the primary goal in adopting GHG significance thresholds, analytical methodologies, and mitigation measures is to ensure new land use development provides its fair share of the GHG reductions needed to address cumulative environmental impacts from those emissions.), https://storage.googleapis.com/slocleanair-org/images/cms/upload/files/Greenhouse%20Gas%20Thresholds%20and%20Supporting%20Evidence%204-2-2012.pdf.

for 2030.[42] By failing to apply a performance threshold to the Project, the SCEA fails to stay in step with evolving scientific knowledge and regulatory schemes governing GHG, as required under *Cleveland II*.

In sum, the SCEA must be recirculated to include an updated GHG analysis addressing the above issues. Furthermore, to the extent the Project is inconsistent with the relevant GHG performance thresholds, the DSEIR should consider additional mitigation measures and alternatives, including but not limited to those discussed below (infra Section H). 1A.20 cont.

C. ENERGY IMPACTS SHOULD ADDRESS THE FAILURE TO INCORPORATE ONSITE SOLAR

CEQA requires an EIR to analyze a project's energy consumption. (Pub. Res. Code § 21100(b)(3).) In addition to examining whether there is a "wasteful, inefficient, or unnecessary use of energy, or wasteful use of energy resources," lead agencies must investigate whether any renewable energy features could be incorporated into the project. (CEQA Guidelines § 15126.2(b); *League to Save Lake Tahoe v. County of Placer* (2022) 75 Cal.App.5th 63, 167-168 [duty to investigate renewable energy option is required as part of determining whether project impacts on energy resources are significant].) A project's compliance with building codes may not be enough where they do not address many considerations under Appendix F of the CEQA Guidelines, like "whether a building should be constructed at all, how large it should be, where it should be located, whether it should incorporate renewable energy resources, or anything else external to the building's envelope … [,] energy impacts for a project intended to transform agricultural land into a regional commercial shopping center." (*California Clean Energy Committee v. City of Woodland* (2014) 225 Cal.App.4th 173, 211.) 1A.21

Here, the SCEA claims the Project would have no energy impacts because it would comply with existing laws and regulations (e.g., Title 24, CalGreen Codes, LA Building Codes). (SCEA, pp. 203-204, 213). However, mere compliance with the Code and existing regulations does "not meet the requirements of appendix F of the CEQA Guidelines." (*Ukiah Citizens for Safety First v. City of Ukiah* (2016) 248 Cal.App.4th 256, 264.) Additionally, the SCEA reports the Project's anticipated electricity needs and reliance upon LADWP's power supply that is subject to the State's Renewable Portfolio Standards ("**RPS**"). (Id., at pp. 205, 210-11, 216.) However, the RPS requirements are a requirement of utility providers, not local land use developments. Thus, the EIR improperly credits the Project for the utilities' compliance with an unrelated state program—something warned against by CARB.[43] The SCEA avoids the relevant question of whether wasteful use of energy can be avoided or renewable energy could be incorporated into the Project. (CEQA Guidelines § 15126.2(b).) Section I of Appendix F of the CEQA Guidelines makes clear that the "goal of conserving energy implies the wise and efficient use of energy[,]" which is achieved by (emphasis added): "(1) decreasing *overall per capita energy consumption*, (2) *decreasing reliance on fossil fuels* such as coal, natural gas and oil, and (3) *increasing reliance on renewable energy sources*." Nowhere does the SCEA explain why solar panels cannot be incorporated into the Project (e.g., rooftop or

[42] AEP (Oct. 2016) Beyond Newhall and 2020, pp. 25, 34, 40 (also identifying other air districts that have adopt/proposed similar screening/efficiency thresholds, https://califaep.org/docs/AEP-2016_Final_White_Paper.pdf.

[43] CARB (12/5/18) RE Centennial Specific Plan Final EIR, pp. 3-4, 6-7, 10-11, https://ww3.arb.ca.gov/toxics/ttdceqalist/centennialfeir.pdf; see also Draft 2022 Scoping Plan, p. 218 ("There is much local jurisdictions can do to enable statewide priorities, such as taking local action to help the state develop the housing, transport systems, and other tools we all need. Indeed, state tools—such as the Cap-and-Trade Program or zero-emission vehicle programs—*do not substitute for these local efforts*." Emphasis added.)

facades,[44] etc.), to meet a percentage of the Project's electricity demand or to the fullest extent feasible based onsite conditions.

In sum, the SCEA must be recirculated to include an analysis of why solar or other renewable energy cannot be utilized on the site, as well as consideration of additional mitigation (discussed infra Section H).

1A.21 cont.

D. VMT IMPACTS COULD BE SIGNIFICANT AND NEED MITIGATION UNDER SCEA RULES

CEQA requires analysis of VMT traffic impacts related to a project. (See *Kings County Farm Bureau v. Hanford* (1990) 221 Cal.App.3d 692, 727.) In particular, CEQA requires analysis of project-related traffic impacts in a manner that does not minimize cumulative impacts. (See e.g., *Cleveland III,* 17 Cal.App.5th at 444-445 [on remand, traffic analysis based on methodology with known data gaps that underestimated traffic impacts necessarily prejudiced informed public participation and decisionmaking]; *Kings County Farm Bureau,* supra at 718, 727 [rejecting determination that less than one percent to area emissions was less than significant because analysis improperly focused on the project-specific impacts and did not properly consider the collective effect of the relevant projects on air quality]; *Save Cuyama Valley v. County of Santa Barbara* (2013) 213 Cal.App.4th 1059, 1072 [upheld the use of same thresholds for immediate and cumulative impacts when its application was "undoubtedly more stringent cumulative-impact threshold"]; *Al Larson Boat Shop, Inc. v. Board of Harbor Comm'rs*, (1993) 18 Cal.App.4th 729, 749 [upheld where cumulative impacts were not minimized or ignored].) The relevant inquiry is not only the relative amount of increased traffic that the Project will cause but whether any additional amount of Project traffic should be considered significant in light of the already serious problem. (See *Los Angeles Unified School District v. City of Los Angeles* (1997) 58 Cal.App.4th 1019, 1025.)

1A.22

Here, the SCEA claims the Project's VMT impact will be mitigated to less than significance via three mitigation measures: (i) MM T-1 (Transportation Demand Management ("**TDM**"); (ii) MM T-2 (Shared Mobility); and (iii) MM T-3 (Unbundled Parking). (SCEA, pp. 131-133, 348.) Specifically, the SCEA estimated VMTs generated by the Project using LADOT's VMT Calculator tool,[45] which estimated a total of 15,812 daily VMTs generated by the proposed Project (before mitigation), resulting in a 6.2 VMT/capita (exceeding the 6.0 threshold) and 7.8 VMT/employee (exceeding 7.6 threshold). (See SCEA, pp. 358; see also APP-F1, PDF pp. 25, 28 [see excerpts on following page].) With mitigation, the Project would purportedly generate 14,865 daily VMTs, resulting in a 4.7 VMT/capita and 7.2 VMT/employee (below thresholds) and, thus, not deemed not significant. (Id.) This conclusion is incorrect for several reasons and inconsistent with the Office of Planning Research ("**OPR**") VMT Guidance.[46]

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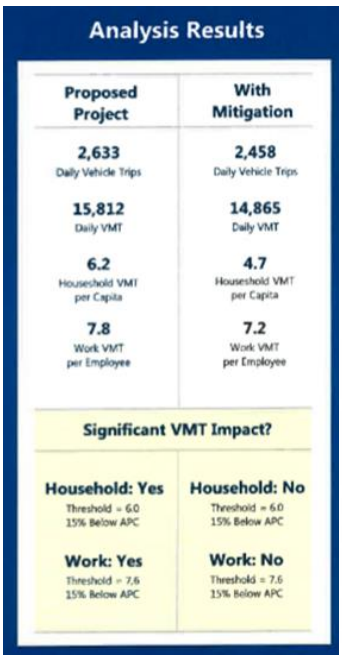
[44] See e.g., PV Magazine (10/24/22) Vertical solar on high-rise building to produce 58 MWh annually, https://pv-magazine-usa.com/2022/10/24/vertical-solar-on-high-rise-building-to-produce-58-mwh-annually/; Dezeen (8/2/22) Kennon designs office tower with "solar facade" for Melbourne, https://www.dezeen.com/2022/08/02/office-tower-solar-facade-melbourne-kennon/.

[45] LADOT Website (accessed 2023) Webpage: Development Review / Transportation Assessment / VMT Calculator (providing hyperlinks to various documents, including: VMT Calculator "**User Guide**" version 1.3 [May 2020]; VMT Calculator "**Documentation**" version 1.3 [May 2020]; LA VMT Calculator Attachment G "**TDM Strategies**" Appendix [Nov. 2019]; Fehr & Peers "**TDF Model Report**" [Feb. 2018]), https://ladot.lacity.org/businesses/development-review; see also LADOT Website (accessed 2023) Webpage: Documents / Transportation Assessment, https://ladot.lacity.org/documents/transportation-assessment

[46] OPR (Dec. 2018) "**Technical Advisory**," pp. 7, https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf.



Analysis Results

Proposed Project	With Mitigation
2,633 Daily Vehicle Trips	2,458 Daily Vehicle Trips
15,812 Daily VMT	14,865 Daily VMT
6.2 Household VMT per Capita	4.7 Household VMT per Capita
7.8 Work VMT per Employee	7.2 Work VMT per Employee

Significant VMT Impact?

Household: Yes Threshold = 6.0 15% Below APC	Household: No Threshold = 6.0 15% Below APC
Work: Yes Threshold = 7.6 15% Below APC	Work: No Threshold = 7.6 15% Below APC

Analysis Results

Total Employees: 192
Total Population: 563

Proposed Project		With Mitigation	
2,633	Daily Vehicle Trips	2,458	Daily Vehicle Trips
15,812	Daily VMT	14,865	Daily VMT
6.2	Household VMT per Capita	4.7	Household VMT per Capita
7.8	Work VMT per Employee	7.2	Work VMT per Employee

Significant VMT Impact?

APC: Central

Impact Threshold: 15% Below APC Average
Household = 6.0
Work = 7.6

Proposed Project		With Mitigation	
VMT Threshold	Impact	VMT Threshold	Impact
Household > 6.0	Yes	Household > 6.0	No
Work > 7.6	Yes	Work > 7.6	No

1. *Generally, the VMT Calculator Model and Thresholds Lack Substantial Evidence for Hotel Developments*

1A.22 cont.

As noted by the OPR, lead agencies have the discretion to develop and adopt their own thresholds under CEQA, provided that they are supported by *substantial evidence* and reflect a *good faith* effort at full disclosure. (Technical Advisory, pp. 6-7, 10.) OPR also makes clear that, to the extent feasible, lead agencies should select VMT models that are *sensitive to features of the project that affect VMT*. (Id., at pp. 29-30.) OPR continues to recommend that, whenever possible, models should be *tailored with localized input* where the project is located. (Id., at p. 31.) Here, however, the VMT Calculator fails to do this for hotel developments for a variety of reasons.

First, the VMT Calculator model was not based on hotel development projects. The VMT calculator first takes the base vehicle trip/VMT calculation and adjusts it based on an MXD methodology that considers a variety of factors (e.g., number of residents and jobs, density, walking/driving connectivity, available transit, vehicle ownership, etc.). (Documentation, pp. 2-3, 11-12.) This was based on a U.S. Environmental Protection Agency ("**EPA**") survey of 239 mixed-use developments ("**MXD**") located in six major regions (id., at pp. 11-13 [fnn. 3 & 4]), conducted between 1991 – 2001 and *none from Southern California*.[47] (See excerpts above.)

	Survey Year	MXDs	Mean Acreage per MXD	Total Trip Ends	Mean Trip Ends per MXD
Atlanta	2001	24	290	6,167	257
Boston	1991	59	175	3,578	60.6
Houston	1995	34	401	1,584	46.6
Portland	1994	53	116	6,146	116
Sacramento	2000	25	179	2,487	99.4
Seattle	1999	44	207	15,915	361.7

[47] Journal of Urban Planning (Sep. 2011) Traffic Generated by MXD—a Six Region Study, p. 7 (Atlanta, Boston, Houston, Portland, Sacramento, Seattle), https://www.researchgate.net/profile/Ming-Zhang-24/publication/

The City further refined these models by collecting surveys from "24 residential, 10 office, and 17 mixed use sites" and validated the results via data collected on 93 developments (id., at p. 13-14, Appendix C)—*none of which were hotels*. (See figure below [no column identifying hotel uses].) This begs the question, where is the substantial evidence or localized input that the model is appropriate for Los Angeles hotels when not a single hotel in Southern California was considered in crafting the model?

1A.22 cont.

Validation Sites

Address	Multi-Family Units	Affordable Units	General Retail	Bank	Health Club	High-Turnover Sit-Down Restaurant	Fast-Food Restaurant	General Office	Medical Office
725 S Bixel St, Los Angeles, CA 90017	632								

Second, the VMT Calculator thresholds systematically ignore more than 90 percent of VMTs generated by hotels. The VMT Calculator provides a trip-based assessment (Documentation, PDF p. 49), which divides the trip generation estimates into six trip purposes within two broader categories: (1) production trips, including (a) home-based work ("**HBW**"), (b) home-based other ("**HBO**"), and (c) non-home-based ("**NHB**"); and attractions trip, including (a) HBW, (b) HBO, and (c) NHB. (Id., at p. 15.) However, the VMT Calculator applies only two thresholds: (1) the Daily Household VMT per Capita ("**VMT/capita**"), which adds only the home-based production trips (i.e., HBW + HBO production trips) and divides it by the population (i.e., population); and (2) Daily Work VMT per Employee ("**VMT/worker**"), which takes only the HBW attraction trips and divides it by the number of workers. (Id., at p. 19.) Hence, no threshold is applied to three of the six trip purposes (i.e., NHB production, HBO and NHB attraction). This is acutely problematic for hotel developments because, as shown in the below figure, the VMT Calculator assumes 91% of all hotel trips fall within trip purposes that are not subject to any threshold (below in green)—meaning only 9 percent (i.e., workers trips) are subject to any threshold (below in yellow). (Id., at PDF p. 46 [Appendix E]; see also excerpts below [highlights added].)

Appendix E
Trip Purpose Assumptions by Land Use

Land Use	Productions			Attractions		
	Home Based Work	Home Based Other	Non-Home Based	Home Based Work	Home Based Other	Non-Home Based
###						
Warehousing/Self-Storage	0%	0%	20%	19%	41%	20%
Hotel (including restaurant, facilities, etc.)	0%	0%	9%	9%	73%	9%

267810030_Traffic_Generated_by_Mixed-Use_Developments_-_A_Six-_Region_Study_Using_Consistent_Built_Environmental_Measures/links/56535f6008aeafc2aabb2709/Traffic-Generated-by-Mixed-Use-Developments-A-Six-Region-Study-Using-Consistent-Built-Environmental-Measures.pdf?origin=publication_detail.

This type of analysis for hotel projects is highly questionable given numerous inconsistencies with OPR recommendations, such as:

- How is the VMT Calculator sensitive to features of hotel development that affect VMT when it systematically ignores 91 percent of all VMTs generated (id., at pp. 29-30)?
- How is applying only a trip-based assessment to hotels appropriate when OPR recommends that approach only for residential and office projects (id., at pp. 5, 29)?
- Given OPR's recommendation to analyze each use separately or focus on the dominant use of a mixed-project (id., at pp. 6, 17), why is the VMT Calculator not analyzing worker and hotel patron trips separately (the former being the vastly dominant form of total VMTs)?

1A.22 cont.

Third, the VMT Calculator model/threshold fails as an effective threshold under the CEQA Guidelines. In response to SB 743, OPR was tasked to establish criteria for VMT thresholds and models that are accurate, reliable, and consistent with the intent of promoting GHG reductions, multimodal transportation networks, and land use diversity. (Pub. Res. Code § 21099(b)(1).) To this end, OPR's guidance clearly embraced long-standing CEQA rules regarding thresholds, such as compliance with qualitative or performance levels that will normally determine the significance of impacts, supported by substantial evidence, ensuring decision makers intelligently take account of environmental consequences of a proposed project, and that cumulative impacts are adequately considered. (Technical Advisory, pp. 6 – 7 [citing CEQA Guidelines §§ 15064.7(a) & (c), 15064(h)(1)), § 15151].) Here, as it relates to hotel developments, there is serious doubt about the efficacy of the City's VMT threshold model and thresholds that ignore over 90 percent of all VMTs generated by hotels, which begs many questions:

- How can VMT effects be considered normally insignificant when only a small, minority portion of the effects are considered (CEQA Guidelines § 15064.7(a))?
- What substantial evidence supports a model entirely based on non-hotel projects or the use of a threshold intended for non-hotel projects (id., at subd. (c))?
- How can VMT impacts be reduced, including cumulative impacts, when the threshold ignores the majority of VMTs generated (id. at subd. (d); see also § 15064(h)(1))?
- How can decision-makers intelligently take account of the environmental consequences of VMTs when only a tiny portion of consequences are even considered (id., § 15064.3(b)(4) [incorporating § 15151])?

In sum, the VMT Calculator model and thresholds are inadequate as they relate to hotel developments. At most, the VMT/worker threshold is potentially appropriate for only 9 percent of a hotel's VMTs, which is not substantial evidence to determine automatically that the other 91% of VMTs are not significant. (See CEQA Guidelines 15064(b)(2) [mere compliance with a threshold does not relieve the agency's need to "consider substantial evidence indicating that the project's environmental effects may still be significant]; see also *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th 1099, 1108 ["thresholds cannot be used to determine automatically whether a given effect will or will not be significant."].)

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2. Here, The VMT Calculator Ignorers VMTs Generated by Hotel Patrons

As discussed above, the VMT Calculator ignores the vast majority of VMTs generated by hotels (generally), which leads to a massive underassessment of this Project's VMT impact. As shown in the below excerpts (APP-F1, PDF p. 35 [highlights added]), the 4.7 VMT/capita is the result of taking the total 2,641 home-based production VMTs (i.e., 1,062 HBW trips + 1579 HBO trips) and dividing it by 563 total residents (see below figure in yellow); and the 7.2 VMT/worker is the result of only 1,388 HBW attraction VMTs divided by 192 employees (see below figure in red). Hence, the VMT Calculator applied a threshold to only 4,029 VMTs (i.e., 1,062 + 1,579+1,388)—or roughly 27 percent of the total 14,865 VMTs generated by the Project. 1A.23

MXD Methodology with TDM Measures

	Proposed Project			*Project with Mitigation Measures*		
	TDM Adjustment	Project Trips	Project VMT	TDM Adjustment	Mitigated Trips	Mitigated VMT
Home Based Work Production	-7.3%	209	1,398	-29.6%	158	1,062
Home Based Other Production	-7.3%	462	2,077	-29.6%	351	1,579
Non-Home Based Other Production	-7.3%	273	2,023	-7.3%	273	2,023
Home-Based Work Attraction	-7.3%	171	1,501	-14.3%	158	1,388
Home-Based Other Attraction	-7.3%	1,171	6,560	-7.3%	1,171	6,560
Non-Home Based Other Attraction	-7.3%	347	2,253	-7.3%	347	2,253

MXD VMT Methodology Per Capita & Per Employee

Total Population: 563
Total Employees: 192
APC: Central

	Proposed Project	*Project with Mitigation Measures*
Total Home Based Production VMT	3,475	2,641
Total Home Based Work Attraction VMT	1,501	1,388
Total Home Based VMT Per Capita	6.2	4.7
Total Work Based VMT Per Employee	7.8	7.2

Notwithstanding a lead agency's discretion to develop and adopt their own thresholds, here, there is no substantial evidence to support a threshold scheme that ignores the vast majority of VMTs generated by this Project—roughly 73 percent of all VMTs generated by this two-tower Project. The SCEA ignores the significance of more than 10,836 daily VMTs generated by the Project (i.e., 2,023 NHB production, 6,560 HBO and 2,253 NHB attraction trips). (See fig. above [not highlighted].) Here, just because 4,029 daily VMTs (i.e., 27% of the total) were determined insignificant does not necessarily mean the other 10,836 daily VMTs (i.e., 73% of total) are not significant in the instant case, much less the cumulative effects of all developments including a hotel component given the VMT Calculator systematically assesses only nine percent of hotel VMTs (discussed supra).

In sum, the SCEA fails to "bridge the analytic gap" showing, through substantial evidence and reasoned explanation, that the VMT Calculator adequately assessed the Project's VMTs. (*Topanga Assn. for a Scenic Community v. County of Los Angeles* (1974) 11 Cal.3d 506, 515; see also *Center for Biological Diversity v. Cal. Dept. of Fish and Wildlife* (2015) 62 Cal.4th 204, 227 [lead agencies must provide "the contours of their logical argument," leaving no "analytical gaps" in the analysis].)

/ / /

3. Outdated and Unclear Site Conditions

As previously mentioned, the SCEA relies on a VMT analysis conducted back in December 2019 (SCEA, APP-F1, PDF p. 16), which was nearly four years ago (well before COVID) and based on an older VMT Calculator model (i.e., v.1.2) as compared to the current version (i.e., v.1.4 in 2023).[48] This is important given the model has changed even between v.1.2 and v.1.3. (Documentation, PDF p. 49.) Furthermore, there is conflicting information about existing site conditions, such as (i) the size of the four buildings (e.g., 89,510 or 61,291 or 60,573 square feet); (ii) uses (e.g., retail, office, industrial, various other uses); and (iii) potential long baseline vacancies. 1A.24

4. Quantitative & Qualitative Evidence Shows Hotel VMTs Are Significant

Notwithstanding the potentially inaccurate data used in this old model, the results themselves demonstrate substantial evidence that the VMTs generated are significant.

First, total VMTs will increase at the Project Site and exceed quantitative thresholds. While OPR recommends efficiency thresholds (i.e., VMT/capita, VMT/worker) for office and residential projects, it recommends assessing the net change in total VMTs for retail projects, redevelopment projects or to assess the "customer VMT component" of the project like a government office building. (Technical Advisory, pp. 5; see also pp. 16, 17.) Here, like a retail or government building, the Project's hotel/restaurant component constitutes a substantial customer VMT component. Here, the Project would admittedly increase total daily VMTs by 248 as compared to the site conditions when modeled under the VMT Calculator (back in December 2019) and thus quantitatively illustrate a significant VMT impact under the retail threshold recommended by OPR. 1A.25

Second, the City could run models to calculate total VMTs in the area change like other cities do. OPR recommends utilizing a qualitative analysis only when quantitative analysis is not possible. (Technical Advisory, p. 7 [fn 12].) One of the quantitative methods recommended is estimating the change in total VMT with and without the project and see if total VMTs in the relevant areas increase or decrease (id., at p. 30), such as what is done for non-screened out developments in the City of Anaheim where the city applies both an efficiency threshold and a total effect on VMT threshold.[49] The SCEA fails to explain why a similar feasible approach was not considered here. 1A.26

Third, failing to provide a qualitative analysis is inconsistent with existing LADOT guidelines. The SCEA must provide at least a qualitative analysis of the hotel guest VMTs under the current LADOT guidance. (See TAG, pp. 2-7 – 2-8, 2-10 [excerpts following page].) The plain language is clear that the SCEA should do this here.

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[48] See https://ladot.lacity.org/businesses/development-review#transportation-assessment; see also LADOT (4/17/20) Pandemic-Related Updates to LADOT's Transportation Assessment Requirements, p. 2 (noting the anticipated revised 1.3 version to be release by June 2020), https://ladot.lacity.org/sites/default/files/documents/ladot-tag-pandemic-related-updates-april-17-2020_0.pdf.

[49] Anaheim (Jun. 2020) TIA Guidelines for CEQA, p. 8 (after running OCTAM model under baseline conditions, baseline plus project, cumulative no project, and cumulative plus project), https://www.anaheim.net/DocumentCenter/View/32774/City-of-Anaheim-TIA-Guidelines-for-CEQA-Analysis-62020.

> Hotel and Motel Uses. VMT impacts of hotel and motel uses should evaluate the VMT impacts of both employee trips and visitor/guest trips, and apply a separate impact threshold to each trip type. The employee trips should be treated similar to those for office uses where the hotel/motel project would result in an impact if it generates work VMT per employee exceeding 15% below the existing average work VMT per employee for the APC in which the project is located.
>
> ###
>
> To evaluate potential VMT impacts of visitor/guest trips, the analysis should screen out visitor/guest trips from a quantitative analysis where those hotels/motels would be considered to meet a localized demand for visitor/guest travel. Hotel and motel uses could be shown to not contribute to significant visitor/guest trips if they are proposed in locations that are closer to common or desired destinations for guests and visitors than other existing hotel and motel uses, and therefore result in shorter overall visitor trips that are expected without the project. The conclusion that hotel and motel uses would not result in a significant VMT impact from visitor/guest trips would be more substantiated where the hotel/motel project includes TDM measures that actively promote transit and bike share services to the hotel/motel patrons.
>
> Where it can not be qualitatively demonstrated that hotel and motel uses would not result in lower guest/visitor trip distances as compared to "without project" conditions, the analysis should quantify the VMT of visitor/guest trips and either evaluate if the visitor/guest trips would lead to a net increase in daily VMT of those trips as compared to without the project or, if technically feasible, would generate VMT per visitor/guest that exceed 15% below the existing average citywide VMT per visitor/guest.
>
> # # #
>
> Hotel and Motel Uses. VMT impacts of hotel and motel uses should evaluate the VMT impacts of both employee trips and visitor/guest trips, and apply a separate impact threshold to each trip type. The employee trips should be treated similar to those for office uses where the hotel/motel project would result in an impact if it generates work VMT per employee exceeding 15% below the existing average work VMT per employee for the APC in which the project is located.

1A.26 cont.

Fourth, hotels are qualitatively a regional serving use, which can be presumed to be significant when hotels displace otherwise existing local-serving businesses. OPR recognizes that regional-serving retail development can have a significant VMT impact as compared to local-serving retail development. (Technical Advisory, p. 16.) So too, OPR warns cities from truncating VMT analysis because of jurisdiction boundaries. (Id., at p. 6.) Here, as a general matter, hotels primarily cater to non-locals and are nothing like a local serving retail establishment—as recognized by other nearby SoCal cities. Additionally, hotel patrons traveling from LAX and outside the region will have lengthy VMT commutes. Furthermore, the Project would remove a variety of smaller yet more diverse local serving uses as described in the SCEA's Phase I. (APP-D, p. 1 [see excerpts following page].) Just like a project that leads to an increase in locally-serving retail can be presumed to have less than significant impacts (as noted by OPR) (Technical Advisory, p. 18), here the Project would decrease locally serving establishments (presumably since the SCEA assumes these uses are still active) and could be presumed to have a significant impact.

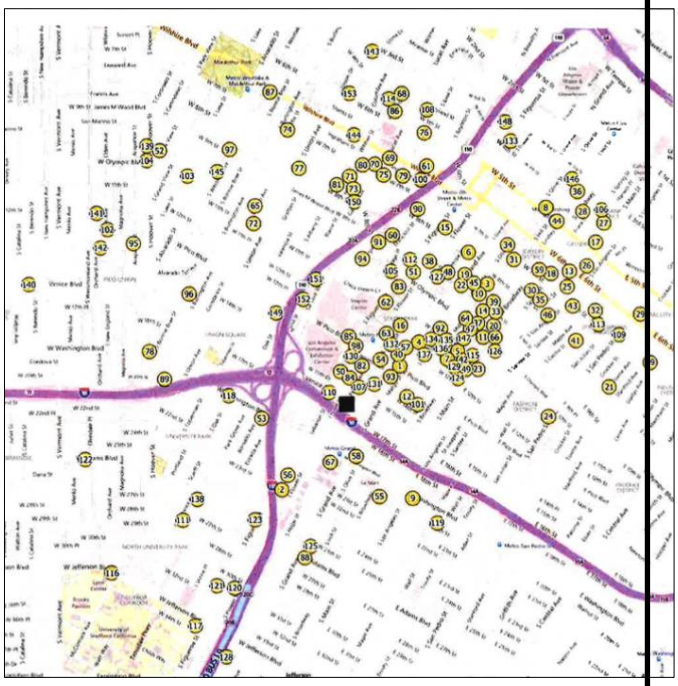
1A.27

/ / /

1A.27 cont.

> Boulevard immediately north of the Santa Monica Freeway, between South Hope Street and South Flower Street, in the City of Los Angeles. The subject property is approximately 1.73 acres in size and is occupied by six industrial structures, separated into three buildings on each half of the subject property, that are approximately 68,273 square feet in total size. The buildings are currently occupied by multiple tenants, including Bibrey/Angelina, a carpenter's shop and mural art studio (1601 South Hope Street), Steps Sportswear, a clothes warehouse and t-shirt silk screening operation (1611 South Hope Street), Hua Chen, an art studio (1611 B South Hope Street), Juan Rosillo, an art studio (1611 C South Hope Street), Create Now, a non-profit organization's office (1611 E South Hope Street), Boehme, an architect's office (1611 South Hope Street), Tri Star Sample Co. (1611 Basement South Hope Street) and Eastern Fabrications, a motor cycle fabrication shop (1625 South Hope Street) on the eastern half; and Sassy & Classy, a cloth cutting operation (1600 South Flower Street), Evolve, a clothes warehouse (1606 South Flower Street) and International Private Label, a clothes warehouse (1616 South Flower Street), on the western half. The remaining portions of the property consist of asphalt paved areas on the southern

Fifth, this part of the City is not underserved by hotels. Adding uses in underserved areas can lead to a net VMT reduction effect, such as adding a grocery store in a food desert that would divert rips from more distance stores (aptly noted by OPR). (Technical Advisory, p. 30.) Here, however, the Project's hotel component does not address unmet local demand when the SCEA shows nearly 30 other planned hotel projects (as of October 2018) near the Project Site that would add about 9,000 hotel rooms. (See SCEA, APP-F2, PDF pp. 122-133 [related projects 19, 25, 34, 42, 44, 55, 62, 79, 83, 87, 91, 97, 98, 105, 106, 110, 112, 117, 121, 126, 129, 130, 132, 137, 145, 146, 148, 149, 151]) (see excerpt right.) Additionally, according to a 2018 CLA report, the City has already reached its hotel room goal.[50]



Furthermore, the SCEA identifies another 132-room hotel project within walking distance from the Project Site. (SCEA, pp. 53-54 [Related Project 6], see figure right.) Unlike housing, which is desperately needed (particularly affordable housing), there is not an overwhelmingly unmet need for more hotel rooms.

In sum, the SCEA must be recirculated to include an updated VMT analysis based on accurate information, as well as consideration of additional mitigation (discussed infra Section H).

[50] CLA (11/21/18) Report RE: Economic Development Incentive Program, pp. 16-17.

E. NOISE/VIBRATION IMPACT NEEDS BETTER ANALYSIS

CEQA requires disclosure and mitigation of noise impacts. (See *Los Angeles Unified School District v. City of Los Angeles* (1997) 58 Cal.App.4th 1019.) These impacts must be explained with "plain language" and draw an explicit connection between increased exposures to their likely human-health effects (e.g., headaches, nuisance, etc.). (CEQA Guidelines § 15140; see also *San Franciscans for Reasonable Growth v. City and County of San Francisco* (1987) 193 Cal.App.3d 1544, 1548; *Bakersfield Citizens,* 124 Cal.App.4th at 1219.) Furthermore, a lead agency may not ignore cumulative noise impacts by claiming an area is already heavily impacted by noise and, therefore, project-related additions would be insignificant. (See *Los Angeles Unified,* 58 Cal.App.4th at 1025.) Here, the SCEA claims noise and vibration impacts are mitigated to less than significant via regulatory compliance and five mitigation measures MM-N-1 through MM-N-6. (SCEA, pp. 124–128.) This conclusion is questionable given the following issues: 1A.28

1. Ambient Noise Levels May Be Inaccurate and Not Represent Realistic Existing Conditions

<u>*First, noise measurements are outdated*</u>. As previously mentioned, the SCEA's reported ambient noise levels were prepared in late 2018 and early 2019 (SCEA, p. 308), which is nearly four years ago and before COVID. To put it in context, LADOT requires traffic counts to be no "more than two years old" before requiring developers to collect new counts.[51] 1A.29

<u>*Second, noise measurements may be inflated from residual peak traffic*</u>. Here, daytime ambient levels were established via 15-minute measurements taken during 10:30 – 11:30 am (SCEA, p. 308), which is just after am peak hour traffic periods (i.e., 7:00 – 10:00 am).[52] This may have inflated baseline ambient levels due to residual traffic congestion following the peak period.

<u>*Third, measurements do not reflect upper-story noise levels*</u>. Ambient levels were taken at the ground floor street level. (SCEA, APP-E, PDF pp. 4, 6, 8, 10, 12, 14.) This may not reflect ambient noise conditions at upper-floor residential sites adjacent to the Project site (SCEA, Fig. 4.2 & Tbl. 4.14), such as the following sensitive receptor sites within 80 feet of the Project Site: (i) site 1, the New Carver Apartments operated by Skid Row Housing Trust ("**SRHT**") for 100 percent special needs homeless population with windows on floors 2 through 5 (13 – 63 feet above grade);[53] (ii) sensitive receptor site 2, the Hope Street Margolis Family Center with windows on floors 2 through 4 (20 - 50 feet above grade);[54] and (iii) sensitive receptor site 4, the 3-story apartment structure subject to rent-stabilized ordinance ("**RSO**") with windows on all three floors (8-30 feet above grade).[55]

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[51] See LADOT (Aug. 2022) Transportation Assessment Guidelines ("**TAG**"), p. 3-7, https://ladot.lacity.org/sites/default/files/documents/2020-transportation-assessment-guidelines_final_2020.07.27_0.pdf.
[52] Ibid., at p. 3-7.
[53] See SRHT, New Carver Apartments, https://skidrow.org/buildings/new-carver-apartments/; DCP Case No. ZA-2006-10146-ZV-ZAA, Elevation Plan (scanned 2/14/08), https://planning.lacity.org/pdiscaseinfo/document/ODg4NDc0/0adcf4f1-673b-40c4-8f45-98866eb1693a/pdd; LA Housing Department, New Carver Apartments, https://lahousing.lacity.org/AAHR/ComCon/Tab/RenderTab?tabname=Property%20Detail&Id=390.
[54] SCEA, Fig. 2.5 (View 9); https://www.hopestreetfamilycenter.org/; GoogleEarth (approximate height estimations).
[55] SCEA Fig. 2.5 (View 9 in the background); GoogleEarth (approximate height estimations); see also ZIMAS, https://zimas.lacity.org/?loc=MTI0LTVBMjA1ICA4Mgo1MTM0MDE1MDEzCjE1MjYgUyBIT1BFIFNUCgo2NDc

Fourth, CNEL ambient levels should be established via 24-hour measurements. The SCEA does not provide a CNEL ambient noise level and provides only early nighttime ambient levels from 9:30-10:30 pm. However, where a project will include noise-generating activities at late-night hours (e.g., hotels, alcohol-serving establishments, bars, etc.), establishing accurate evening and nighttime noise levels is critical for the City to protect nearby residents from sleep-disturbing impacts. We question why 24-hour measures were not taken to establish 24-hour CNEL levels or 15-minute measures later in the evening, closer to midnight, when levels tend to be lower, like other City CEQA reviews.[56] 1A.29 cont.

2. Construction impacts could be underestimated and require more mitigation.

First, equipment usage factors are used inconsistently. The SCEA estimates the highest estimated exterior construction noise by looking at five equipment pieces (e.g., two backhoes, one tractor, one dozer, and one concrete saw) (SCEA, pp. 311-12; APP-E, PDF pp. 17 – 20), which reflects the equipment listed in the CalEEMod worksheets for the Project's demolition phase. (APP-A2, p. 71.) However, the load factor for the concrete saw is roughly 75% as compared to the noise worksheet assumption of only 20 percent. (*Compare* APP-A2, p. 71 *with* APP-E, PDF pp. 17). This same type of inconsistency is also present during the building phase analysis for the anticipated crane, generator, and three welders (compare APP-A2, p. 71 with APP-A2, PDF p. 25); repeated during the finishing architectural coating phase for the two aerial lifts, missing forklift, and all ten air compressors (compare APP-A2, pp. 71-72 with APP-A2, PDF p. 31); and committed again during the paving phase for the Cement and Mortar Mixer, Paving Equipment, and rollers (compare APP-A2, pp. 72 with APP-A2, PDF p. 41). 1A.30

Second, a realistic construction equipment list is needed. The SCEA does not provide an equipment list for the various construction phases, which may include much louder equipment, such as trucks, pneumatic impact equipment, jackhammers, scrapers, and rock drilling that generate noise levels around or more than 90 dBA at 50 feet away according to the City's CEQA 1A.31

5ODE1LjI4MjQ2NDcwMSwxODM1MjY3LjA2Njc3OTY1MjQsNjQ4MTY4NC4wMzI0NjQ3MDEsMTgzNjQ3MS4yMzM0NDYzMTkKMTI0LTVBMjA1ICA4Mg%3D%3D.

[56] See e.g., Paseo Marina Project (DCP Case No. ENV-2016-3343) Draft EIR Noise Section, PDF p. 12 (collecting 24-hour measurement for some receptors and day and nighttime measurements for another), https://planning.lacity.org/eir/PaseoMarina/Deir/files/D_IVH.pdf; Venice Place Project (DCP Case No. ENV-2016-4321) Draft EIR Noise Section, PDF p. 11 (taking both day and night measurements), https://planning.lacity.org/eir/VenicePlace/Deir/DEIR%20Sections/4.H.%20Noise.pdf; 713 E. 5th St. Project (DCP Case No. ENV-2017-421) Draft EIR Noise Section, PDF p. 12 (15-minute and 24-hour measurements taken), https://planning.lacity.org/eir/713_East_5th/Deir/files/D_IVE.pdf; Landmark Apartments Project (DCP Case No. ENV-2013-3747) Draft EIR Noise Section, PDF p. 11 (day and nighttime levels established), https://planning.lacity.org/eir/LandmarkApartments/DEIR/files/D_IVH.pdf; Hollywood & Gower Project (DCP Case No. ENV-2016-2849) Draft EIR Noise Section, PDF p. 15 (15-minute day and night measurements taken), https://planning.lacity.org/eir/Hollywood_and_Gower_2018/Deir/DEIR%20Sections/IV.I%20Noise%20(Hollywood%20&%20Gower).pdf; Fig & 8th Project (DCP Case No. ENV-2016-1951) Draft EIR Noise Section, PDF pp. 13-14 (day and night time measurements taken), https://planning.lacity.org/eir/Fig_and_8th/Deir/files/D_IVE.pdf; Mt. St. Mary's Univ. Chalon Campus Project (DCP Case No. ENV-2016-2319) Draft EIR Appendix G Technical Report, PDF p. 25 (15-min. and 24-hr. measurements taken), https://planning.lacity.org/eir/MSMU_Chalon_Campus/Deir/Appendix%20G%20Noise%20and%20Vibration%20Report.pdf; 6421 W. Selma (DCP Case No. ENV-2016-2602) MND, PDF pp. 182-184 (calculating noise levels at varying hours during the early morning, daytime, early evening, and late evening), https://planning.lacity.org/staffrpt/mnd/Pub_010418/ENV-2016-2602.pdf.

Threshold Guide.[57] Nor is there consideration about larger bulldozers, large/loaded trucks, or caisson drilling equipment. (APP-A2, PDF p. 41.) 1A.31 cont.

<u>*Third, reference noise levels may be underestimated*</u>. The noise worksheet references noise levels (Lmax) for the equipment listed, which seem lower than the ranges listed in the City's CEQA Threshold Guide.[58]) 1A.32

<u>*Fourth, noise mitigation seems weak and insufficient*</u>. Several of the proposed mitigation measures are flawed (SCEA, pp. 313-14), such as: 1A.33

- MM-N-1 (avoid operating several pieces of equipment simultaneously) has no performance standards and is susceptible to being unilaterally ignored by the construction crew.
- MM-N-3 (sound barriers) are too short at eight feet to block the line of sight to residents on upper floors, and the performance standard (-12.5 & -10 dBA) may need to achieve even greater attenuation to address the underestimated construction noise impacts (discussed above).
- MM-N-4 (portable blankets during structural framing) may be necessary for all portions of construction, including finishing. Furthermore, active noise monitoring is essential to ensure 5 dBA threshold is not exceeded.

3. Operational Noise Impact Analysis Is Incomplete

The SCEA claims composite onsite noise (i.e., HVAC equipment, 5th-level amenity deck, parking) would not exceed thresholds and imposes no mitigations. (SCEA, pp. 315-319.) However, this may not be accurate given that a variety of factors were not considered in the SCEA's analysis, such as the following. 1A.34

<u>*First, there are missing calculations.*</u> The SCEA acknowledges that large crowds can gather on the 5th-level amenity decks. (SCEA, p. 317), and claims to provide potential crowd noise based on half of the maximum occupancy speaking (i.e., one-quarter of men at 65 dBA and one-quarter of women at 62 dBA). (Id.) However, no calculations are provided in the worksheets to correlate to the figures provided in Table 4.17 of the SCEA. The SCEA must show the work.

<u>*Second, there is no accounting for the Lombard Effect.*</u> The SCEA does not account for elevated speech levels in large crowds (a phenomenon known as the Lombard Effect), which can be exacerbated by amplified ambient music, alcohol, and other factors that can collectively create substantially louder noise levels.[59] Studies confirm that in an increase in background noise, like the babble of large crowds, people will increase their speech to raised voice levels (73 dBA at three 1A.35

[57] See City (2005) L.A. CEQA Thresholds Guide, p. I.1-8 (Exh. I.1-1]), https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/A07.pdf; see also EPA (12/31/71) Noise From Construction Equip. & Operations, Building Equipment, and Home Appliances, pp. 8-26, https://nepis.epa.gov/Exe/ZyPDF.cgi/9101NN3I.PDF?Dockey=9101NN3I.PDF.
[58] See L.A. CEQA Thresholds Guide, ibid., p. I.1-8; EPA Noise Equip., ibid., p. 11.
[59] Proceedings of Acoustics (2006) Prediction of Crowd Noise, PDF pp. 2-3, https://www.acoustics.asn.au/conference_proceedings/AASNZ2006/papers/p46.pdf; Journal of the Acoustical Society of America (May 2013) Evidence That The Lombard Effect Is Frequency-Specific In Humans, PDF pp. 1, 7 (confirm that broadband noise containing <u>*speech-similar frequencies*</u> "significantly increased" the intensity, duration, and frequency of adult speakers, and <u>*not just caused by a general response in an increase in ambient noise*</u>, https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3985863/pdf/JASMAN-000134-000640_1.pdf.

feet) or even to very loud voice levels (78 dBA at three feet),[60] which has been used in prior City CEQA reviews.[61] These can include impacts to sensitive receptors 2, 4, 5, and 7 (SCEA, Fig. 4.2.)

1A.35 cont.

Third, the SCEA must address the potential for amplified/low-frequency music. The SCEA mentions the ample 5th-level amenity deck as including an outdoor event terrace, pool, and other amenities. (SCEA, pp. 23, 24.) The SCEA does not describe whether amplified music would be provided, ambient or otherwise, or what kind of events would be held, such as disc jockey (DJ) events that feature the unique problem of low-frequency noise impacts. Pubs, nightclubs, and other entertainment uses are unique in that they are characterized by amplified noise predominately at low-frequency between 60-125 Hz (e.g., the thumping of bass beat).[62] Low-frequency noise (less than 250 Hz) presents a unique problem in that it propagates "*with little attenuation*" through walls, windows, and passive noise barriers (e.g., noise absorbing and insulating materials) and even increases sound pressure levels inside rooms.[63] Excessive exposure to low-frequency noise has

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[60] Proceedings of Acoustics, ibid.; see also U.S. EPA (12/31/71) Community Noise, PDF pp. 51-53 (Fig. 19 showing a raised voice level [73 dBA @ 3'] for intelligible conversation and Fig. 20 showing a very loud voice level [78 dBA @ 3'] for intelligible conversation at a 3rd-floor high-rise in Downtown Los Angeles), https://nepis.epa.gov/Exe/ZyPDF.cgi/2000PKUG.PDF?Dockey=2000PKUG.PDF.

[61] *See* e.g., 3400 S. Figueroa St. (DCP Case Nos. ENV-2009-271) Draft EIR Noise Section, PDF p. 34 (utilizing 75 dBA and 71 dBA noise level for male and female speakers, respectively, the mean of which is 73 dBA @ 3' level), https://planning.lacity.org/eir/USC/DEIR/files/IV.H.%20%20%20Noise%20.pdf; 333 S. La Cienega Blvd. (DCP Case Nos. ENV-2015-897) Draft EIR Appendix B- Technical Noise Report, PDF p. 43 (same noise referenced for half of a 100-person crowd on a 4,352-SF, 20th-floor outdoor amenity area), http://planning.lacity.org/eir/333LaCienaga/files/Appendix%20B%20-%20Noise%20Technical%20Report_102015.pdf; *accord* 11770 Wilshire Blvd. (DCP Case Nos. ENV-2013-3747) Draft EIR Noise Section, PDF p. 31 (300-person crowd on a 11,241-SF outdoor pool deck), https://planning.lacity.org/eir/LandmarkApartments/DEIR/files/D_IVH.pdf; 1727 Cherokee Ave. (DCP Case Nos. ENV-2013-522) Draft EIR Noise Section, PDF pp. 31-32 (410-person crowd on a 12,522-SF pool/roof decks), https://planning.lacity.org/eir/HollywoodCherokee/files/DEIR_IV.G.pdf; 2901 E. Olympic Blvd. (DCP Case Nos. ENV-2008-2141) Draft EIR Noise Section, PDF p. 35 (500-person crowd in outdoor areas), https://planning.lacity.org/eir/BoyleHeights/DEIR/files/IV.H.%20Noise.pdf; 930 Wilshire Blvd. (DCP Case Nos. ENV-2009-1577) Draft EIR Appendix IV.C.1-Noise Impact Study, PDF pp. 57-58 (500-person crowd on top of a 8,432-SF podium rooftop terrace), http://www.planning.lacity.org/EIR/WilshireGrandRedevProj/DEIR/DEIR%20Appendices/Appendix%20IV.C.1.pdf; 1900 S. Broadway (DCP Case Nos. ENV-2008-1773) Draft EIR Noise Section, PDF pp. 24-25 (650-person crowd on 8,000-SF restaurant/outdoor space on rooftop level), http://www.planning.lacity.org/EIR/TheReef/deir/DEIR%20Sections/IV.K.%20Noise.pdf.

[62] Noise & Health (2012) Occupational noise exposure of nightclub bar employees in Ireland, PDF p. 6 ("It is evident that the lower frequencies (63 and 125 Hz) were more prominent than the mid to high frequencies. The 63 and 125 Hz frequencies were higher than *90 dBA in 89% of the nightclubs*." Emph. added), https://arrow.dit.ie/cgi/viewcontent.cgi?article=1002&context=ehsiart; University of Salford (2005) Noise from Pubs and Clubs Final Report, PDF p. 2, 31 (study urging objective rating to assess low-frequency noise from pub and club noise that include "music type, bass level and bass beat."), https://www.dropbox.com/s/xisv5zxy5gk11jr/University%20of%20Salford%20%28Mar.%202005%29%20Noise%20from%20Pubs%20and%20Clubs%20Final%20Report.pdf?dl=0; University of Salford (2005) Noise from Pubs and Clubs-Phase I, PDF pp. 11-12, 37 ("Entertainment noise often has prominent low-frequency content" with "[n]oise *levels up to 115 dB Leq in the 63 Hz octave band* and *110 dB Leq in the 125 Hz octave band were recorded on dance floors of night clubs*." Emph. added), https://pdfs.semanticscholar.org/3b22/cedb67647dd3f8ebbc736688389d34108781.pdf.

[63] Noise & Health (2004) Effects of Low Frequency Noise on Sleep ("As low frequencies propagate with little attenuation through walls and windows, many people may be exposed to low frequency noise in their dwellings ... Indoors, *room resonances in the low frequency range will increase the sound pressure* levels and also lead to variations of sound pressure level inside the room." Emph. Added), http://www.noiseandhealth.

been linked to a variety of health symptoms including stress, anxiety, headaches, fatigue, depression, difficulty of falling and staying asleep, feeling languid and tensed in the morning.[64] Residents and other noise-sensitive receptors living in urban environments routinely complain about the unique impact of nearby nightclubs featuring loud, bass-thumbing noise.[65]

1A.35 cont.

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org/article.asp?issn=1463-1741;year=2004;volume=6;issue=23;spage=87;epage=91;aulast=Waye; Applied Acoustics (7/29/16) Design And Experimental Tests Of Active Control Barriers For Low-Frequency Stationary Noise Reduction In Urban Outdoor Environment, PDF p. 1 ("passive techniques are effective in noise reduction at middle-high frequencies, they become less efficient at low frequencies (below 300 Hz) … On the other side, [active noise control] techniques are able to implement a fairly good control of low-frequency noise emissions"), https://www.dropbox.com/s/6xqltnq9tye8zfe/Applied%20Acoustics%20%28July%202016%29%20Design%20And%20Experimental%20Tests%20Of%20Active%20Control%20Barriers%20For%20Low-Frequency%20Stationary%20Noise.pdf?dl=0; Noise & Health (2004) Low frequency noise and annoyance ("As low frequencies propagate with little attenuation through walls and windows, many people may be exposed to low frequency noise in their dwellings."), http://www.noiseandhealth.org/article.asp?issn=1463-1741;year=2004;volume=6;issue=23;spage=59;epage=72;aulast=Leventhall; Applied Acoustics (2018) Recreational Noise: Impact And Costs For Annoyed Residents In Milan And Turin, PDF p. 2 ("… low frequencies diffusion through the building structure is *particularly serious when discos or late night pubs are located in the building itself*." Emph. added), https://www.dropbox.com/s/ykjmw3lvwwyzbzo/Applied%20Acoustics%20%282018%29%20Recreational%20noise_Impact%20and%20costs%20for%20annoyed%20residents%20in%20Milan%20and%20Turin.pdf?dl=0; Building & Environment (2015) Low Frequency Sound Insulation Analysis And Evaluation Of Stiffened Building Structures, PDF p. 2 ("Nowadays, *low frequency noise (LFN) is recognized as a serious environmental noise problem* and proved to have many negative impacts on residents' health and well-being … However, *none of the current single-number rating methods [i.e., STC] has fully considered the frequency range of 20 Hz - 250 Hz*." Emph. added), https://www.dropbox.com/s/oatwe75an6l5ass/Building%20%26%20Environment%20%282015%29%20Low%20frequency%20sound%20insulation%20analysis%20and%20evaluation%20of%20stiffened%20building%20structures.pdf?dl=0; Soundproofing Company Inc., (2019) Understanding STC and STC Ratings (… "largest problem with relying on a STC number alone is that STC only considers *frequencies down to 125 Hz*. This can be misleading because *most sound isolation complaints are from noise sources that are below 125 Hz* … [such as] Most of the sound energy generated by the average home theater … Guitar, *bass, drums* …" emph. added), https://www.soundproofingcompany.com/soundproofing_101/understanding-stc-and-stc-ratings.

[64] NOISE-CON 2004 (2004) The Impact of A-weighting Sound Pressure Level Measurements during the Evaluation of Noise Exposure, PDF pp. 3-4, http://storeycountywindfarms.org/ref3_Impact_Sound_Pressure.pdf; Noise & Health (2004) Low frequency noise and annoyance (impacts from 10-200 Hz), http://www.noiseandhealth.org/article.asp?issn=1463-1741;year=2004;volume=6;issue=23;spage=59;epage=72;aulast=Leventhall; Noise & Health (2004) Evaluation Of Annoyance From Low Frequency Noise Under Laboratory Conditions, http://www.noiseandhealth.org/article.asp?issn=1463-1741;year=2010;volume=12;issue=48;spage=166;epage=181;aulast=Pawlaczyk-Luszczynska; Acoustical Society of America (2009) A Procedure for The Assessment of Low Frequency Noise Complaints, PDF p. 5 (Tbl. II listing symptoms reported), https://www.dropbox.com/s/5t9b79f9dkxejow/Acoustical%20Society%20of%20America%20%282009%29%20A%20Procedure%20for%20The%20Assessment%20of%20Low%20Frequency%20Noise%20Complaints.pdf?dl=0; Noise & Health (2004) Effects of Low Frequency Noise on Sleep, http://www.noiseandhealth.org/article.asp?issn=1463-1741;year=2004;volume=6;issue=23;spage=87;epage=91;aulast=Waye.

[65] Miami Herald (7/18/17) Downtown Nightclub Owners Want Citations for Loud Music Dismissed ("Residents, armed with their own sound measurements that show that the *subwoofer bass beat is especially disruptive* …" emph. added), https://www.miamiherald.com/news/local/community/miami-dade/article162156433.html; Bowery Bookie (7/19/18) When it Comes to Lack of Noise Violations Against Bars, It's All About that Bass ("Anyone who's lived above, adjacent to, or down the block from a boisterous club understands that *bass is often the worst noise offender* … Alan Fierstein, an acoustic consultant who assists residents and businesses document noise levels (he's at many CB3 meetings), believes *inspectors often fail to record violations 'because they often don't isolate the lower frequencies associated with thumping bass*.'" Emph.

Fourth, the SCEA does not account for echoes/reflective sounds. The SCEA does not address how the Project will exacerbate existing and new direct noise in the form of reflective noise. It is well known to urban planners that external building facades can reflect noise from sources and increase noise levels to sensitive receptors, particularly in urban environments.[66] This is caused by a receptor being exposed to both a noise source's (1) *direct noise* and (2) *reflected noise* echoing off a reflective surface (e.g., retaining wall, building structure). The combined effect can increase noise levels at a receptor by up to 3 dBA in some instances but often between 1-2 dBA when considering the special relationship of the receptor and source, intervening noise barriers, and absorptive qualities of the reflected surface.[67] However, at frequencies below 500 Hz (like amplified club noise discussed above), urban canyons can increase noise levels up to 10 dBA.[68] For example, existing westbound traffic along the 10 Freeway could reflect Tower 2 (impacting sensitive receptors 1 and 2) (SCEA, Fig. 2.19, 4.2) or create an urban canyon between the Towers (affecting receptor 7) (SCEA Figs. 2.18, 4.2). Additionally, new crowd noise on the 5th-level podium (potentially large, intoxicated crowds with amplified low-frequency music) could reflect off both Towers towards Hope St. and Venice Blvd. (impacting Sensitive Receptors 4, 5, 7) (SCEA, Figs. 2.17, 4.2). 1A.35 cont.

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added), https://www.bowerybooogie.com/2018/07/when-it-comes-to-lack-of-noise-violations-against-bars-its-all-about-that-bass/; Brick Underground (2/27/19) Up All Night: NYC Hotels That Generate The Most Noise Complaints ("The hotel has a 4,800-square-foot rooftop pool and bar where parties are held on the weekend. Even guests find the music disruptive. 'It's *so loud and the bass is so strong that it's impossible to sleep*,' according to one Trip Advisor review." Emph. added), https://www.brickunderground.com/live/nyc-top-10-hotels-generate-most-noise-complaints; Windsor Star (2/20/17) All About That Bass: Downtown Nightclub Must Pay Neighbor $25,000 In Noise Complaint, Court Rules ("…the noise from [the club] is different. '*Boom, boom, boom… like a bass drum beating* in my bedroom… like an elephant stomping in my room.'" Emph. added), https://windsorstar.com/news/local-news/all-about-that-bass-downtown-nightclub-must-pay-neighbour-25000-in-noise-complaint-court-rules.

[66] *See e.g.,* McGraw-Hill, Inc. (1991) Handbook of Acoustical Measurements and Noise Control, PDF p. 19 ("… where there are many multistory buildings, even the noise from local sources decreases more slowly *(or even increases) owing to the reflections from adjacent buildings*." Emph. added), https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/I11.pdf; City of Elk Grove (9/29/11) Draft EIR for Proposed Sphere of Influence Amendment, PDF p. 209 ("In some cases, external building facades can influence reflected noise levels affecting adjacent buildings. This is primarily a problem where high-rise buildings are proposed, and the effect is most evident in urban areas, where an urban canyon may be created."), https://docplayer.net/61698754-City-of-elk-grove-proposed-sphere-of-influence-amendment-draft-environmental-impact-report-lafc-09-10.html; 1020 S. Figueroa St. (DCP Case No. ENV-2015-1159) Draft EIR Noise Section, PDF p. 2 (noting "A receptor located on the same side of the wall as a noise source may actually experience an increase in the perceived noise level as the wall reflects noise back to the receptor, *thereby compounding the noise*." Emph. added), http://planning.lacity.org/eir/1020SoFigueroa/DEIR/4_G_Noise.pdf; 1211 W. Pico Blvd. (DCP Case No. ENV-2011-0585) Draft EIR Noise Section, PDF p. 2, https://planning.lacity.org/eir/ConventionCntr/DEIR/files/IV.E%20Noise.pdf; LOD (6/22/06) ZA-2005-0365, pp. 10-13 (where "this Zoning Administrator can testify that the sound level in such an environment is significantly higher than that associated with City traffic heard from inside a car" and recognizing drawback of mitigation barriers that can "act as reflectors of the same sound"), http://planning.lacity.org/PdisCaseInfo/Home/GetDocument/YTBiODUzYWMtM2Y0Ni00ZGI5LWJlY2YtZjVmMTNlMjE0MGVm0; California Department of Transportation ("**Caltrans**") (Aug. 2006) Traffic Noise Analysis Protocol, pp. 17-18 (discussion of reflective noise off noise barriers), http://www.dot.ca.gov/hq/env/noise/pub/2006_protocol.pdf.

[67] See Caltrans (Sep. 2013) Technical Noise Supplement, pp. 2:37-385:27-32, http://www.dot.ca.gov/hq/env/noise/pub/TeNS_Sept_2013A.pdf.

[68] The Journal of the Acoustical Society of America (2014) Low Frequency Acoustic Resonances In Urban Courtyards, PDF p. 2, https://www.dropbox.com/s/9ji5jzijvkim3xk/The%20Journal%20of%20the%20Acoustical%20Society%20of%20America%20%282014%29%20Low%20Frequency%20Acoustic%20Resonances%20In%20Urban%20Courtyards.pdf?dl=0.

4. Absent Analysis, Pile Driving Should Be Clearly Barred

The SCEA claims there would be no vibration impacts in part because there is no pile driving proposed for the Project and purposefully removes any mention of pile driving from mitigation measure PPM-NOISE-2. (SCEA, p. 322 [fn 173].) However, neither the SCEA nor the geotechnical report clearly identifies the manner in which foundations and piles are to be installed. (APP-B, pp. 26-30 [generally] & p. 29 [reference vibratory pile driving].) Moreover, absent a clear restriction from pile driving, there is nothing to stop a future property owner/development team from proposing pile driving in the future. A prohibition on pile driving is a fundamental assumption that should be clearly identified in the proposed MMP (presumably attached as enforceable conditions of approval) as opposed to relying on a Building and Safety staff to have the SCEA handy and be aware of footnote 173. 1A.36

In sum, the SCEA must be recirculated to include updated noise measurements and analysis of all potential noise sources, including large crowds, as well as consideration of additional mitigation for noise and vibration impacts (discussed infra Section H). 1A.37

F. THE PROJECT SHOULD NOT DEFER ANALYSIS OF POTENTIAL PCE/TCE VAPOR INTRUSION

The potential existence of toxic contamination on a project site is a significant impact requiring CEQA review. (*City of Maywood v. Los Angeles Unified School Dist.* (2012) 208 Cal.App.4th 362, 396; *McQueen v. Board of Directors* (1988) 202 Cal.App.3d 1136." Here, the Site has been subject to a Phase I and Phase II site assessment where tetrachloroethene ("**PCE**") and trichloroethene ("**TCE**") were detected in the soil vapor in 2017, which the SCEA claims warrants no further investigation and only requires a Soil Management Plan ("**SMP**") to be prepared in the future as mitigation (MM-HAZ-1). (SCEA, pp. 273, 276-77.) This conclusion may be incorrect for several reasons, including:

First, the Phase II site assessment may have used the wrong attenuation factors. The 2017 Phase II compared soil vapors to commercial "screening" thresholds established by the Department of Toxic Substances Control ("**DTSC**"). (APP-D, PDF pp. 873, 875.) It specifically stated that additional evaluation may be warranted for redevelopment for residential uses, not that a mere SMP is all that is necessary. (Id., at 875.) Recently, DTSC and its sister agency (Water Board) have developed new guidance on screening the risk of vapor intrusion, with a particular focus on using attenuation factors that are more health-protective than prior models (i.e., Johnson and Ettinger).[69] (See figure right.)

D1 – Recommended Attenuation Factors for Screening

USEPA recommends empirically-derived AFs as shown in Table 2 (USEPA, 2015a). These conservative AFs are protective of public health under most building occupancy scenarios and can be used for the initial screening of sites in California unless alternative approaches (see D2) are established. Site-specific AFs based on mathematical models, such as the Johnson and Ettinger model, may not be appropriate for the initial screening described in Steps 1 through 3 of this Supplemental Guidance for the following reasons:

Table 2: Medium-Specific Attenuation Factors

Medium	Attenuation Factor
Crawl Space Air	1
Subslab Soil Gas	0.03
Soil Gas	0.03
Groundwater (generic)	0.001
Groundwater (fines)[5]	0.0005

1A.38

[69] Final Draft Supplemental Guidance: Screening and Evaluating Vapor Intrusion (Feb. 2023) pp. vii, 8, https://dtsc.ca.gov/wp-content/uploads/sites/31/2023/02/VI_SupGuid_Screening-Evaluating.pdf.

Here, contrary to the new guidance, the Phase II used an attenuation of 0.001 despite being collected just five feet below ground surface ("**bgs**") and where groundwater is deeper than 100 feet bsg. (APP-D, PDF pp. 872-874 [see excerpts below].)

1A.38

Based on a review of groundwater data presented in the State Water Resources Control Board (SWRCB) GeoTracker website, groundwater was not detected to the maximum depth explored of 100-feet below ground surface at a site assessment located at 1600 South Figueroa Street, approximately 255-feet northwest of the Site (*Second Quarter 2017 Remedial Status Report Toyota Dealership 1600 South*

# # #

3.2 SOIL VAPOR SAMPLING

On October 26, 2017, EFI Global directed Optimal Technology to conduct a soil vapor survey throughout the Site to evaluate for the presence of VOCs in the subsurface. A total of ten soil vapor samples (B1 through B10; Figure 2) and one duplicate sample (B10-SV-11 Dup) were collected throughout the Site. Soil vapor sampling depths were set at approximately 5-feet below ground surface (bgs) in locations B1 through B9 and at approximately 5- and 11-feet bgs in location B10.

# # #

There are two methods whereby this formula can be used to evaluate site-specific analytical data, as follows:

- Method 1: Soil vapor sample analytical results can be multiplied by the attenuation factor to calculate the estimated concentrations of VOCs that would be anticipated in indoor air. These estimated concentrations can then be compared directly to the established screening levels for indoor air.
- Method 2: The established screening levels for indoor air can be divided by the attenuation factor to convert them into screening levels for soil vapor. The soil vapor analytical results can then be compared to these calculated screening levels, which represent the maximum concentrations of VOCs that may be present in soil vapor without resulting in an unacceptable risk to building occupants.

For the case of an existing commercial building where soil vapor samples are collected near the contaminant source, an α of 0.001 has been established. Using this attenuation factor and Method 2 above, preliminary screening levels were determined for the Site using indoor air screening levels from two repositories, as follows:

Second, the Phase II does not address vapor intrusion impacting offsite receptors via preferential pathways. Utilities like sewers, storm drains, utilities, and fiber optic cable housing can serve as a "preferential pathway" for vapors.[70] Here, the Phase II fails to address underground utilities or other potential preferential pathways leading to PCE/TCE migration offsite.

Third, deferred mitigation is improper. Instead of analyzing the Site conditions, now, the proposed future SMP is inadequate mitigation because, as the language suggests, the mitigation measures rely on the formation of future plans and potential testing with no performance standards tied to them. This amounts to improper deferred mitigation under CEQA.[71]

[70] Ibid., pp. 5-6, 52-53; USEPA (Jun. 2015) OSWER Technical Guide For Assessing And Mitigating The Vapor Intrusion Pathway From Subsurface Vapor Sources To Indoor Air, PDF pp. 16, 91, https://www.epa.gov/sites/default/files/2015-09/documents/oswer-vapor-intrusion-technical-guide-final.pdf.
[71] See e.g., *City of Maywood v. Los Angeles Unified School Dist*. (2012) 208 Cal.App.4th 362, 407 (CEQA requires lead agencies to "craft mitigation measures that would satisfy enforceable performance criteria."); *Concerned*

In sum, the Phase II performed merely a screening risk assessment (APP-D, PDF p. 875), based on outdated methodologies and specifically stated that further evaluation may be warranted for a residential development. SCEA must be recirculated to include a Vapor Intrusion Human Health Risk Assessment, consistent with updated DTSC guidance, and followed up by an appropriate work plan for any additional remediation that may be required (noted infra Section H). 1A.38 cont.

G. LAND USE INCONSISTENCY MUST BE DISCLOSED

An EIR must identify, fully analyze, and mitigate any inconsistencies between a proposed project and the general, specific, regional, and other plans that apply to the project. (CEQA Guidelines § 15125(d); *Pfeiffer v. City of Sunnyvale City Council* (2011) 200 Cal.App.4th 1552, 1566; *Friends of the Eel River v. Sonoma County Water Agency* (2003) 108 Cal.App.4th 859, 881.) There does not need to be a direct conflict to trigger this requirement; even if a project is "incompatible" with the "goals and policies" of a land use plan, the EIR must assess the divergence between the project and the plan, and mitigate any adverse effects of the inconsistencies. (*Napa Citizens for Honest Government v. Napa County Bd. of Supervisors* (2001) 91 Cal.App.4th 342, 378-79; *Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903 [holding under CEQA that a significant impact exists where project conflicts with local land use policies]; *Friends of "B" Street v. City of Hayward* (1980) 106 Cal.App.3d 988, 998 [held county development and infrastructure improvements must be consistent with adopted general plans] [citing Gov. Code 65302].) Incompatibility with governing land use plans and policies is contrary to the general plan and public welfare and, thus, is an adequate ground to reject the discretionary legislative land use Project Approvals. 1A.39

Here, the SCEA should consider consistency with downtown hotel-specific CUP requirements that may soon be adopted. The SCEA considers the Project's consistency with the Downtown Los Angeles Community Plan Update ("**DTLA 2040**"). (SCEA, pp. 11-13, 291-92.) DTLA was adopted in May and June of 2023 (pending form and legality),[72] which was amended to include a hotel-specific CUP subject to six findings, which relate to local hiring, market studies relating to the demand for hotels, expected compensation for future employees, and displacement and replacement of existing housing.[73] (See figure following page.)

Citizens of Costa Mesa, Inc. v. 32nd Dist. Agricultural Assn. (1986) 42 Cal.3d 929, 935 (enforceable performance standards "ensure the integrity of the process of decision making by precluding stubborn problems or serious criticism from being swept under the rug."); *Lincoln Place Tenants Ass'n v. City of Los Angeles* (2005) 130 Cal.App.4th 1491, 1508 ("Mitigating conditions are not mere expressions of hope."); *Federation of Hillside & Canyon Ass'ns v. City of Los Angeles* (2000) 83 Cal.App.4th 1252, 1261 ("feasible mitigation measures will actually be implemented as a condition of development."); *Oro Fino Gold Mining Corp. v. County of El Dorado* (1990) 225 Cal.App.3d 872, 884 ("There cannot be meaningful scrutiny (of an environmental review document) when the mitigation measures are not set forth at the time of project approval.").

[72] Council File No. 22-0617, https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=22-0617; DCP, DTLA Update, https://planning.lacity.org/plans-policies/community-plan-update/downtown-los-angeles-community-plan-update.

[73] See Council File No. 22-0617, https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=22-0617; Amending Motion 54 D, https://clkrep.lacity.org/onlinedocs/2022/22-0617_misc_amd%2054D_kre_price_5-3-23.pdf; Council Action (adopting amending Motion 54 D), https://clkrep.lacity.org/onlinedocs/2022/22-0617_misc_%205-9-2023.pdf; UrbanizeLA (5/5/23) L.A. City Council votes to adopt new community plans for DTLA and Hollywood, https://la.urbanize.city/post/la-city-council-votes-adopt-new-community-plans-dtla-and-hollywood.

INSTRUCT the Department of City Planning, in coordination with the City Attorney, to amend the findings necessary for a Conditional Use Permit for Hotels/Motel within the Downtown Community Plan to the following;

1. Whether there is sufficient market demand for the hotel/motel or transient occupancy residential structure project proposed

2. Whether the impact of the employees of the hotel/motel on the demand in the city for housing, public transit, childcare and other social services taking into consideration the impact of the part-time or seasonal nature of work at the hotel/motel or transient occupancy residential structure project and of the hotel/motel employees' expected compensation.

3. Whether the applicant will take measures to employ residents of neighborhoods adjoining the hotel/motel or transient occupancy residential structure project in order to minimize increased demand for regional transportation and to reduce demand for vehicle trips and vehicle miles traveled

4. Whether the applicant will take measures to encourage hotel workers and guests to use public transportation, cycling and other non-automotive means of transportation

5. Whether the hotel/motel or transient occupancy residential structure project will support small businesses in the immediate vicinity and whether the applicant will adopt any measures to increase demand for local goods and services.

6. Whether the hotel/motel will not negatively affect the availability of existing affordable and rent stabilized housing and the project includes the replacement of any rent stabilized or restricted affordable housing existing on site within the past ten years with affordable housing and any non-restricted or rent stabilized housing with moderate income housing.

1A.39 cont.

In sum, the SCEA should consider the Project's potential inconsistency with these potential new zoning rules, including any new hotel CUP requirement, and minimize them to the extent feasible.

H. ADDITIONAL MEASURES SHOULD BE CONSIDERED OR EXPLAINED WHY NOT FEASIBLE

As discussed above, much of the SCEA's analysis is infected by outdated and potentially inaccurate information, relies on questionable models and significance thresholds, and fails to consider various areas of concern. Collectively, these errors may underestimate Project impacts and ultimately lead to less project-level mitigation being considered. Here, numerous feasible mitigations are available, including those recommended by SCAG in its RTP/SCS PEIR MMRP (SCEA, Tbl. 3.3)[74] and similar measures urged by other public agencies (CARB, OPR, CAPCOA, SCAQMD),[75] including but not limited to the following measures that should be considered:

1A.40

[74] https://scag.ca.gov/sites/main/files/file-attachments/exhibit-a_connectsocal_peir.pdf?1606004156.
[75] SCAG (Dec. 2019) Final Program EIR, pp. 2.0-18 – 2.0-71 (see "project-level mitigation measures" for air quality, GHG, and transportation impacts), https://scag.ca.gov/sites/main/files/file-attachments/fpeir_connectsocal_complete.pdf?1607981618; CARB 2022 Scoping Plan, 4, 7, 24, 29 & Appendix D, pp. 23, https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/2022-scoping-plan-docu

1. *Require proven design features that deliver genuine sustainability,* such as:

    - Achieving LEED Platinum and/or achieving Tier 1 or Tier 2 CalGreen status;
    - Maximize onsite solar panels; and
    - Increase the total amount of EV chargers by applying requirements (typically a percentage of parking provided) prior to taking any reductions (e.g., bicycle) or to all spaces beyond absolute minimums under local and State laws.[76]

2. *Require more robust TDM measures for hotel operations*. For example, a hotel-specific mandatory commuter reduction program could include:

    - Specific performance level to be reached (e.g., specific VMT or average daily trip reduction or both);
    - Specified participation level (e.g., 100 % employees);
    - Participation in guarantee ride programs;
    - Inventive employee carpool/vanpool access to preferential parking spaces or hotel valet service or both;
    - Subsidized transit passes for hotel workers and patrons; and
    - Dedicated shuttle service for hotel patrons toward nearby destinations.[77]

3. *Consistent with the State's SB 1383 and City plastic reduction efforts, implementing hotel-specific recycling and food waste programs*. For example, the City should consider hotel-specific recycling programs that includes:

    - Promote recycled paper and other products like soap;
    - Bans on disposable (i.e., designed to be used once and discarded) foodware items and accessories;
    - Allowing customers to bring their own reusable items (if permissible, this be waived to accommodate kosher or other religious standards);
    - Requirements for hand soap in refillable containers;
    - No promotional items made of plastic;
    - No water in plastic bottles or disposable single-use cups;
    - No expanded polystyrene (i.e., Styrofoam);

1A.40 cont.

ments; CARB's 2017 Scoping Plan, Appendix B-Local Action, pp. 1-8, 7-9 & Appendix D, p. 2, https://www.arb.ca.gov/cc/scopingplan/app_b_local_action_final.pdf; OPR (Dec. 2018) Technical Advisory, pp. 27, https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf; CAPCOA (Dec. 2021) Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity, pp. 31-32, 73, 76, 80-96, https://www.airquality.org/ClimateChange/Documents/Final%20Handbook_AB434.pdf; CAPCOA (Aug. 2010) Quantifying GHGs and Mitigation, pp. 64-74, https://www.contracosta.ca.gov/DocumentCenter/View/34123/CAPCOA-2010-GHG-Quantification-PDF.

[76] Which City Planning Commission ("**CPC**") supported for other projects. (See CPC (11/17/22) Item 7 Audio, appx. mm:ss 48:40 – 49:00, https://planning.lacity.org/plndoc/Audio/CPC/2022/11-17-2022/7_CPC_2021_4937_CU_DB_SPR_WDI_HCA.mp3.)

[77] See e.g., Santa Monica Municipal Code § 9.5.130(B)(2)(b); https://www.octa.net/getting-around/rideshare/oc-rideshare/employers/guaranteed-ride-home-program/; https://www.ci.healdsburg.ca.us/AgendaCenter/ViewFile/Item/3098?fileID=21731;

- Require reusable napkins and tablecloths with recyclable disposable napkins only allowed for takeout;
- Hand dryers in areas accessible to customers;
- Requirement for reusable laundry bags;
- Reusable dishware for room service;
- Eliminate coffee pods/coffee machines that require pods;
- Offer toothpaste tablets in refillable packaging such as glass bottles or jars;
- Provide bamboo toothbrushes;
- Offer toiletries on request rather than automatically;
- Key cards made out of non-plastic materials, including traditional metal keys or wood, bamboo, and paper options for chip-based cards;
- Incentives for returning keys to discourage waste;
- Non-plastic shower caps, razors, shaving cream, slippers, eye masks, ear plugs;
- Remove minifridge items that use plastic;
- Eliminate the use of garbage bags if possible, or use based on compostable material;
- Choose home compostable gloves;
- Do not use plastic wrap;
- Serve employee meals with reusable dishware and cutlery, as well as provide reusable water bottles for all employees with accessible water bottle refill stations;
- Replace paper towels with reusable dish rags; and
- Source plastic-free sponges.[78]

1A.40 cont.

4. *Additional measures urged by public agencies* that can help reduce emissions or VMTs or both, such as:

- Using greywater systems;
- Using lighter-colored (or permeable) pavement and cool roofs where feasible;
- Installing smart HVAC systems that automatically adjust based on occupancy;
- Using cement blended with the maximum feasible amount of flash or other materials that reduce GHG emissions from cement production;
- Incorporating the neighborhood electric vehicle networks;
- Promoting telework options by ensuring high-speed internet (e.g., fiber-optic);
- Achieving Net-Zero GHG emissions;
- Commit to highly efficient commercial equipment, particularly those related to refrigeration, cooling, and heating the building; and
- Purchasing carbon offset credits.[79]

[78] See e.g., https://www.nytimes.com/2022/05/17/travel/clean-the-world-hotel-soap.html; https://freakonomics.com/podcast/the-economics-of-everyday-things-used-hotel-soaps/; https://cleantheworld.org/; https://bluestandard.com/guides/hotel-guide/; https://clkrep.lacity.org/onlinedocs/2021/21-0064_ord_187718_1-23-23.pdf.

[79] See e.g., CARB's 2022 Scoping Plan, supra fn 67, pp. 4, 7, 24, 29; CARB's 2017 Scoping Plan, supra fn 67, pp. 1-8; SCAG's 2020 RTP/SCS Program EIR, supra fn 67, pp. 2.0-23 – 2.0-25, 2.0-40 – 2.0-43; CAPCOA GHG Reductions Handbook, supra fn 67, pp. 31-32; OPR Technical Advisory, supra fn 67, p. 27.

5. *Requiring a percentage of residential units to be affordable units or serve as workforce housing*, which multiple public agencies recognize can be a means of reducing VMTs and mobile emissions affecting air quality and GHG.[80]

6. *Maximize the use of native, drought-resistant landscaping and avoid unnecessary removal*, such as to the extent mature street trees can remain in place and be accommodated onsite and not removed. If replacement is required, the City should consider mitigation to the following effect:

> *All required replacement street trees shall be comprised of California native/indigenous trees. California native/indigenous trees include but are not limited to the trees designated "California Native" on the Tree People City of Los Angeles Approved Street Tree List: https://www.treepeople.org/wp-content/uploads/2021/02/TreePeoples-LA-City-Approved-Street-Tree-List.pdf. When feasible, new landscaping shall be comprised of California native/indigenous water-conserving plants, in substantial conformance with project plans (provided in Attachment B). California Native/indigenous plants include but are not limited to plants listed by the Metropolitan Water District and the California Native Plant Society in their Planting Guide for LA County: https://www.bewaterwise.com/assets/mwd_plantguide-screen_la_4_23.pdf .*

7. *Full consideration of TCE/PCE mitigation prior to granting the City Approval*, such as the preparation of a human health risk assessment for TCE/PCE vapor intrusion risk, consistent with current DTSC guidance, and followed up with the development of a remedial work plan that removes all sources of contamination to residential standards and addresses any potential for offsite migration via preferential pathways.

8. *Robust noise and vibration mitigation*, such as:

   - Require ground floor sound barriers to be at least 15 feet high and require portable sound blankets for upper-story construction during the entirety of the Project construction;
   - Place active noise monitors near sensitive receptors and establish a protocol that ensures the immediate stoppage of work when noise thresholds are exceeded and specific actions to be taken prior to work resuming;
   - Places physical and operational measures to reduce operational noise impacts, such as sufficiently thick and high guard rails to block the line of sight of noise sources, limiting amplified music, barring all live and DJ events, directing speakers away from sensitive

1A.40 cont.

[80] See e.g., CARB, 2022 Scoping Plan, Appendix D, pp. 23, https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/2022-scoping-plan-documents; CARB's 2017 Scoping Plan, Appendix D, pp. 2, https://www.arb.ca.gov/cc/scopingplan/app_b_local_action_final.pdf; SCAG's 2020 RTP/SCS Program EIR, ibid, pp. 2.0-42, https://scag.ca.gov/sites/main/files/file-attachments/dpeir_connectsocal_executivesummary.pdf?1606002543; CAPCOA (2022) GHG Reductions Handbook, pp. 73, 76, 80-96, https://www.caleemod.com/documents/handbook/full_handbook.pdf; OPR Technical Advisory, pp. 27, http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf.

receptors, placing master volume controls on equipment, and include active noise monitoring around the permitter of the 5th-level amenity deck; and
- Absent further analysis, explicitly bar pile driving.

1A.40 cont.

In sum, the SCEA's flawed analysis underestimates significant impacts that should be mitigated via additional measures, including but not limited to those above. Local 11 urges the City to recirculate the SCEA to fix said errors and consider the above-listed mitigation measures.

III. CONCLUSION

In sum, Local 11 is concerned with the Project's potentially significant impact on air quality, GHG, VMTs, energy, noise/vibration, hazards, and inconsistency with applicable land use rules. Collectively, the SCEA errors discussed herein mask potentially significant impacts that can be lessened via project-specific mitigated added to the Project's MMP. Until such time, the SCEA fails to incorporate applicable mitigation contrary to CEQA requirements. (See Pub. Res. Code § 21155.2(a).) Thus, Local 11 respectfully asks the City to stay action on the Project Approvals until the various errors are cured in a CEQA-compliant recirculated SCEA that incorporates additional mitigation noted outlined in Section H above.

1A.41

Local 11 reserves the right to supplement this appeal justification at future hearings and proceedings for this Project. (See *Galante Vineyards v. Monterey Peninsula Water Management Dist.* (1997) 60 Cal.App.4th 1109, 1120 [CEQA litigation not limited only to claims made during EIR comment period].) This Office requests, to the extent not already on the notice list, all notices of CEQA actions and any approvals, Project CEQA determinations, or public hearings to be held on the Project under state or local law requiring local agencies to mail such notices to any person who has filed a written request for them. (See Pub. Res. Code §§, 21092.2, 21167(f) and Gov. Code § 65092 and LAMC § 197.01.F.) Please send notice by electronic and regular mail to Jordan R. Sisson, Esq., 801 S. Grand Avenue, 11th Floor, LA, CA 90017 (jordan@gideonlaw.net).

Thank you for consideration of these comments. We ask that this letter be placed in the administrative record for the Project.

Sincerely,

_____

Jordan R. Sisson
Attorney for Local 11

COMMENT LETTER NO. 1B

Rey Fukuda <rey.fukuda@lacity.org>

South Park Tower Project (DCP Case Nos. ENV-2018-3337, CPC-2018-3336): SCEA Comments

jordan@gideonlaw.net <jordan@gideonlaw.net> Thu, Nov 23, 2023 at 8:16 AM
To: Rey Fukuda <rey.fukuda@lacity.org>
Cc: Charlie Carnow <ccarnow@unitehere11.org>

Rey—To be clear, on behalf of UNITE HERE, we are formally withdrawing/rescinding our prior letter sent invertedly. It should *not* be forwarded to decisionmakers or part of the record here. Please confirm or call me if you have any questions about this formal withdrawal.

-JRS

From: jordan@gideonlaw.net <jordan@gideonlaw.net>
Sent: Thursday, November 23, 2023 6:54 AM
To: 'Rey Fukuda' <rey.fukuda@lacity.org>
Cc: 'Charlie Carnow' <ccarnow@unitehere11.org>
Subject: RE: South Park Tower Project (DCP Case Nos. ENV-2018-3337, CPC-2018-3336): SCEA Comments

Mr. Fukuda—We are withdrawing the previously submitted comment letter. Please confirm. Enjoy your Thanksgiving.

-JRS

1B.1

From: Rey Fukuda <rey.fukuda@lacity.org>
Sent: Tuesday, November 21, 2023 1:14 PM
To: jordan@gideonlaw.net
Cc: Charlie Carnow <ccarnow@unitehere11.org>
Subject: Re: South Park Tower Project (DCP Case Nos. ENV-2018-3337, CPC-2018-3336): SCEA Comments

Received, thank you. Have a great day.

[Quoted text hidden]

COMMENT LETTER NO. 2A

P: (626) 314-3821
F: (626) 389-5414
E: info@mitchtsailaw.com

Mitchell M. Tsai
Law Firm

139 South Hudson Avenue
Suite 200
Pasadena, California 91101

VIA E-MAIL

November 20, 2023

Rey Fukuda, City Planning Associate
221 North Figueroa Street, Suite 1350
Los Angeles, California 90012
200 North Spring Street, Room 763
Los Angeles, California 90012
P: (213) 847-3686
E: rey.fukuda@lacity.org

RE: Western States Regional Council of Carpenters' Comments Regarding the City of Los Angeles' South Park Towers Sustainable Communities Environmental Assessment (Case Nos. ENV-2018-3337-SCEA, CPC-2018-3336-SN-TDR-CUB-ZV-SPR-MSC, VTT-82213).

Dear Mr. Fukuda:

On behalf of the Western States Regional Council of Carpenters (**WSRCC**), this office is submitting these comments in regard to the Sustainable Communities Environmental Assessment (**SCEA**) for the City of Los Angeles' ("**City**") South Park Towers Project ("**Project**").

The Project, characterized by Los Angeles City Planning as "mixed-use" and proposed by Venice Hope Group LLC ("**Applicant**"), proposes to demolish and replace a collection of four small commercial office/retail buildings with two high-rise towers. The completed development would include 300 hotel rooms, 250 residential units, 13,000 square feet of ground-floor retail uses, and podium parking for 288 vehicles. The two towers would be comprised of a 22-story, dual flag hotel building fronting Flower Street and a 23-story residential building at Hope Street. Renderings portray a pair of contemporary glass-and-steel structures with landscaped amenity decks at the podium and roof levels, as well as additional spaces carved into the sides of the towers. Other project components would include fitness centers, private patios, and meeting space for the hotel, which would sit one block south of Metro's Pico

2A.1

Station. The Project will include an approximate total of 452,630 square feet of floor area. The Project is proposed at 1600-1618 South Flower Street, 1601-1623 South Hope Street, 426-440 West Venice Boulevard, Los Angeles, California 90015 ("**Site**").

Applicant is requesting the following discretionary actions:

(1) Pursuant to Los Angeles Municipal Code (**LAMC**) §§ 17.01 and 17.15, a Vesting Tentative Tract Map to create one master ground lot and to subdivide the site into four airspace lots for a high-density mixed-use Project;

(2) Pursuant to LAMC § 14.5.6(B), a Transfer of Floor Area Rights for the transfer of approximately 226,121 square feet of floor area;

(3) Pursuant to LAMC § 12.24(W)(1), a Conditional Use Permit for the sale of a full-line of alcoholic beverages for on-site consumption only within the proposed hotel;

2A.1 cont.

(4) Site Plan Review pursuant to LAMC § 16.05 for the construction of 250 dwelling units, 300 hotel rooms and 13,120 square feet of ground-floor commercial floor area;

(5) Pursuant to LAMC § 12.21(G), a Director's Determination to allow for up to a 10% reduction in the total required usable open space;

(6) Pursuant to LAMC § 12.24(S), a 20% decrease in the required parking for the hotel; and

(7) Pursuant to LAMC § 12.32(S), approval of a Supplemental Use Sign District (SN) to permit a sign district.

WSRCC is a labor union representing over 90,000 union carpenters in 12 states, including California, and has a strong interest in well-ordered land use planning and in addressing the environmental impacts of development projects. Individual members of WSRCC live, work, and recreate in the City and the surrounding communities and would be directly affected by the Project's environmental and social impacts.

WSRCC expressly reserves the right to supplement these comments at or prior to hearings on the Project, and at any later hearing and proceeding related to this Project. Gov. Code, § 65009, subd. (b); Pub. Res. Code, § 21177, subd. (a); see *Bakersfield Citizens for Local Control v. Bakersfield* (2004) 124 Cal.App.4th 1184, 1199-1203; see also *Galante Vineyards v. Monterey Water Dist.* (1997) 60 Cal.App.4th 1109, 1121.

WSRCC incorporates by reference all comments raising issues regarding the Project and its environmental review and associated documents and reports. See *California Clean Energy Committee v. City of Woodland* (2014) 225 Cal.App.4th 173, 191 (citing *Citizens for Open Government v. City of Lodi* (2006) 144 Cal.App.4th 865, 875) (finding that any party who has objected to a project's environmental documentation may assert any issue timely raised by other parties); see also *Santa Teresa Citizen Action Group v. City of San Jose* (2003) 114 Cal.App.4th 689, 701 (citing Pub. Res. Code, § 21177, subds. (a)-(b)) (to attack a decision that is subject to CEQA, the alleged grounds for noncompliance must have been presented to the public agency, and the person attacking the decision must have raised some objection during the administrative proceedings). 2A.1 cont.

Moreover, WSRCC requests that the City provide notice for any and all notices referring or related to the Project issued under CEQA (Pub. Res. Code, § 21000 et seq.), and the California Planning and Zoning Law ("**Planning and Zoning Law**") (Gov. Code, §§ 65000–65010). California Public Resources Code, §§ 21092.2 and 21167(f) and California Government Code § 65092 require agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency's governing body.

I. THE CITY SHOULD REQUIRE THE USE OF A LOCAL SKILLED AND TRAINED WORKFORCE TO BENEFIT THE CITY'S ECONOMIC DEVELOPMENT AND THE ENVIRONMENT.

The City should require that the Project be built using local workers who have graduated from a Joint Labor-Management Apprenticeship Program approved by the State of California, have at least as many hours of on-the-job experience in the applicable craft which would be required to graduate from such a program, or are registered apprentices in such a program. 2A.2

Community benefits such as local hire can also be helpful to reduce environmental impacts and improve the positive economic impacts of the Project. Local hire provisions requiring that a certain percentage of workers reside within 10 miles or less of the Project site can reduce the length of vendor trips, reduce greenhouse gas emissions, and provide localized economic benefits. As environmental consultants Matt Hagemann and Paul E. Rosenfeld note:

> [A]ny local hire requirement that results in a decreased worker trip length from the default value has the potential to result in a reduction of construction-related GHG emissions, though the significance of the reduction would vary based on the location and urbanization level of the project site.

March 8, 2021, SWAPE Letter to Mitchell M. Tsai re Local Hire Requirements and Considerations for Greenhouse Gas Modeling.

2A.2 cont.

Workforce requirements promote the development of skilled trades that yield sustainable economic development. As the California Workforce Development Board and the University of California, Berkeley Center for Labor Research and Education concluded:

> [L]abor should be considered an investment rather than a cost—and investments in growing, diversifying, and upskilling California's workforce can positively affect returns on climate mitigation efforts. In other words, well-trained workers are key to delivering emissions reductions and moving California closer to its climate targets.[1]

Furthermore, workforce policies have significant environmental benefits given that they improve an area's jobs-housing balance, decreasing the amount and length of job commutes and the associated greenhouse gas (**GHG**) emissions. In fact, on May 7, 2021, the South Coast Air Quality Management District found that the "[u]se of a local state-certified apprenticeship program" can result in air pollutant reductions.[2] Locating jobs closer to residential areas can have significant environmental benefits. As the California Planning Roundtable noted in 2008:

> People who live and work in the same jurisdiction would be more likely to take transit, walk, or bicycle to work than residents of less balanced

[1] California Workforce Development Board (2020) Putting California on the High Road: A Jobs and Climate Action Plan for 2030 at p. ii, *available at* https://laborcenter.berkeley.edu/wp-content/uploads/2020/09/ Putting-California-on-the- High-Road.pdf.

[2] South Coast Air Quality Management District (May 7, 2021) Certify Final Environmental Assessment and Adopt Proposed Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions Program, and Proposed Rule 316 – Fees for Rule 2305, Submit Rule 2305 for Inclusion Into the SIP, and Approve Supporting Budget Actions, *available at* http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2021/2021-May7-027.pdf?sfvrsn=10.

> communities and their vehicle trips would be shorter. Benefits would include potential reductions in both vehicle miles traveled and vehicle hours traveled.[3]

Moreover, local hire mandates and skill-training are critical facets of a strategy to reduce vehicle miles traveled (**VMT**). As planning experts Robert Cervero and Michael Duncan have noted, simply placing jobs near housing stock is insufficient to achieve VMT reductions given that the skill requirements of available local jobs must match those held by local residents.[4] Some municipalities have even tied local hire and other workforce policies to local development permits to address transportation issues. Cervero and Duncan note that: 2A.2 cont.

> In nearly built-out Berkeley, CA, the approach to balancing jobs and housing is to create local jobs rather than to develop new housing. The city's First Source program encourages businesses to hire local residents, especially for entry- and intermediate-level jobs, and sponsors vocational training to ensure residents are employment-ready. While the program is voluntary, some 300 businesses have used it to date, placing more than 3,000 city residents in local jobs since it was launched in 1986. When needed, these carrots are matched by sticks, since the city is not shy about negotiating corporate participation in First Source as a condition of approval for development permits.

Recently, the State of California verified its commitment towards workforce development through the Affordable Housing and High Road Jobs Act of 2022, otherwise known as Assembly Bill No. 2011 (**AB2011**). AB2011 amended the Planning and Zoning Law to allow ministerial, by-right approval for projects being built alongside commercial corridors that meet affordability and labor requirements.

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[3] California Planning Roundtable (2008) Deconstructing Jobs-Housing Balance at p. 6, *available at* https://cproundtable.org/static/media/uploads/publications/cpr-jobs-housing.pdf.

[4] Cervero, Robert and Duncan, Michael (2006) Which Reduces Vehicle Travel More: Jobs-Housing Balance or Retail-Housing Mixing? Journal of the American Planning Association 72 (4), 475-490, 482, *available at* http://reconnectingamerica.org/assets/Uploads/UTCT-825.pdf.

The City should consider utilizing local workforce policies and requirements to benefit the local area economically and to mitigate GHG emissions, improve air quality, and reduce transportation impacts. 2A.2 cont.

II. THE CALIFORNIA ENVIRONMENTAL QUALITY ACT.

A. Background Concerning Environmental Impacts Reports.

The California Environmental Quality Act is a California statute designed to inform decision-makers and the public about the potential significant environmental effects of a project. CEQA Guidelines, § 15002, subd. (a)(1).[5] At its core, its purpose is to "inform the public and its responsible officials of the environmental consequences of their decisions *before* they are made." *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564. 2A.3

CEQA directs public agencies to avoid or reduce environmental damage, when possible, by requiring alternatives or mitigation measures. CEQA Guidelines, § 15002, subds. (a)(2)-(3); see also *Berkeley Keep Jets Over the Bay Committee v. Board of Port Commissioners of the City of Oakland* (2001) 91 Cal.App.4th 1344, 1354; *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 400. The Environmental Impact Report (**EIR**) serves to provide public agencies and the public in general with information about the effect that a proposed project is likely to have on the environment and to "identify ways that environmental damage can be avoided or significantly reduced." CEQA Guidelines, § 15002, subd. (a)(2). If the project has a significant effect on the environment, the agency may approve the project only upon finding that it has "eliminated or substantially lessened all significant effects on the environment where feasible" and that any unavoidable significant effects on the environment are "acceptable due to overriding concerns" specified in Public Resources Code § 21081. See CEQA Guidelines, §§ 15092, subds. (b)(2)(A)-(B).

While the courts review an EIR using an 'abuse of discretion' standard, the reviewing court is not to *uncritically* rely on every study or analysis presented by a project proponent in support of its position. *Berkeley Keep Jets*, *supra*, 91 Cal.App.4th at p. 1355 (quoting *Laurel Heights, supra,* 47 Cal.3d at pp. 391, 409 fn. 12) (internal quotations

[5] The CEQA Guidelines, codified in Title 14 of the California Code of Regulations, § 15000 et seq., are regulatory guidelines promulgated by the state Natural Resources Agency for the implementation of CEQA. Pub. Res. Code, § 21083. The CEQA Guidelines are given "great weight in interpreting CEQA except when . . . clearly unauthorized or erroneous." *Center for Biological Diversity v. Dept. of Fish & Wildlife* (2015) 62 Cal.4th 204, 217.

omitted). A clearly inadequate or unsupported study is entitled to no judicial deference. *Ibid.* Drawing this line and determining whether the EIR complies with CEQA's information disclosure requirements presents a question of law subject to independent review by the courts. *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 515; *Madera Oversight Coalition, Inc. v. County of Madera* (2011) 199 Cal.App.4th 48, 102, 131. As the First District Court of Appeal has previously stated, prejudicial abuse of discretion occurs if the failure to include relevant information precludes informed decision-making and informed public participation, thereby thwarting the statutory goals of the EIR process. *Berkeley Keep Jets, supra*, 91 Cal.App.4th at p. 1355 (internal quotations omitted). 2A.3 cont.

The preparation and circulation of an EIR is more than a set of technical hurdles for agencies and developers to overcome. *Communities for a Better Environment v. Richmond* (2010) 184 Cal.App.4th 70, 80 (quoting *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 449-450). The EIR's function is to ensure that government officials who decide to build or approve a project do so with a full understanding of the environmental consequences and, equally important, that the public is assured those consequences have been considered. *Ibid.* For the EIR to serve these goals it must present information so that the foreseeable impacts of pursuing the project can be understood and weighed, and the public must be given an adequate opportunity to comment on that presentation before the decision to go forward is made. *Ibid.*

A strong presumption in favor of requiring preparation of an EIR is built into CEQA. This presumption is reflected in what is known as the "fair argument" standard under which an EIR must be prepared whenever substantial evidence in the record supports a fair argument that a project may have a significant effect on the environment. *Quail Botanical Gardens Found., Inc. v. City of Encinitas* (1994) 29 Cal.App.4th 1597, 1602; *Friends of "B" St. v. City of Hayward* (1980) 106 Cal.3d 988, 1002.

The fair argument test stems from the statutory mandate that an EIR be prepared for any project that "may have a significant effect on the environment." Pub. Res. Code, § 21151; see *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.App.3d 68, 75 (hereafter, "*No Oil*"); accord *Jensen v. City of Santa Rosa* (2018) 23 Cal.App.5th 877, 884 (hereafter, "*Jensen*"). Under this test, if a proposed project is not exempt and may cause a significant effect on the environment, the lead agency must prepare an EIR. Pub. Res. Code, §§ 21100, subd. (a), 21151; CEQA Guidelines, §§ 15064, subds. (a)(1), (f)(1). An

EIR may be dispensed with only if the lead agency finds no substantial evidence in the initial study or elsewhere in the record that the project may have a significant effect on the environment. *Parker Shattuck Neighbors v. Berkeley City Council* (2013) 222 Cal.App.4th 768, 785. In such a situation, the lead agency *must* adopt a negative declaration. Pub. Res. Code, § 21080, subd. (c)(1); CEQA Guidelines, §§ 15063, subd. (b)(2), 15064, subd. (f)(3).

2A.3 cont.

"Significant effect upon the environment" is defined as "a substantial or potentially substantial adverse change in the environment." Pub. Res. Code, § 21068; CEQA Guidelines, § 15382. A project may have a significant effect on the environment if there is a reasonable probability that it will result in a significant impact. *No Oil, supra,* 13 Cal.App.3d at p. 83 fn. 16; see *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 309 (hereafter, "*Sundstrom*"). If any aspect of the project may result in a significant impact on the environment, an EIR must be prepared even if the overall effect of the project is beneficial. CEQA Guidelines, § 15063, subd. (b)(1); see *County Sanitation Dist. No. 2 v. County of Kern* (2005) 127 Cal.App.4th 1544, 1580.

This standard sets a "low threshold" for preparation of an EIR. *Consolidated Irrigation Dist. v. City of Selma* (2012) 204 Cal.App.4th 187, 207; *Nelson v. County of Kern* (2010) 190 Cal.App.4th 252; *Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903, 928; *Bowman v. City of Berkeley* (2004) 122 Cal.App.4th 572, 580; *Citizen Action to Serve All Students v. Thornley* (1990) 222 Cal.App.3d 748, 754; *Sundstrom, supra,* 202 Cal.App.3d at p. 310. If substantial evidence in the record supports a fair argument that the project may have a significant environmental effect, the lead agency must prepare an EIR even if other substantial evidence before it indicates the project will have no significant effect. See *Jensen, supra*, 23 Cal.App.5th at p. 886; *Clews Land & Livestock v. City of San Diego* (2017) 19 Cal.App.5th 161, 183; *Stanislaus Audubon Society, Inc. v. County of Stanislaus* (1995) 33 Cal.App.4th 144, 150; *Brentwood Assn. for No Drilling, Inc. v. City of Los Angeles* (1982) 134 Cal.App.3d 491; *Friends of "B" St.*, 106 Cal.App.3d 988; CEQA Guidelines, § 15064, subd. (f)(1).

B. Background Concerning Initial Studies, Negative Declarations, and Mitigated Negative Declarations.

CEQA and its Guidelines are strict and unambiguous about when a Mitigated Negative Declaration (**MND**) may be used. A public agency must prepare an EIR whenever substantial evidence supports a "fair argument" that a proposed project "may have a significant effect on the environment." Pub. Res. Code, §§ 21100,

21151; CEQA Guidelines, §§ 15002, subds. (f)(1)-(2), 15063; *No Oil, supra,* 13 Cal.App.3d at p. 75; *Communities for a Better Environment v. California Resources Agency* (2002) 103 Cal.App.4th 98, 111-112. Essentially, should a lead agency be presented with a fair argument that a project may have a significant effect on the environment, the lead agency shall prepare an EIR even though it may also be presented with other substantial evidence that the project will not have a significant effect. CEQA Guidelines, §§ 15064(f)(1)-(2); see *No Oil, supra,* 13 Cal.App.3d at p. 75 (internal citations and quotations omitted). Substantial evidence includes "enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached." CEQA Guidelines, § 15384, subd. (a).

2A.3 cont.

The fair argument standard is a "low threshold" test for requiring the preparation of an EIR. *No Oil, supra,* 13 Cal.App.3d at p. 84; *County Sanitation, supra,* 127 Cal.App.4th at p. 1579. It "requires the preparation of an EIR where there is substantial evidence that any aspect of the project, either individually or cumulatively, may cause a significant effect on the environment, regardless of whether the overall effect of the project is adverse or beneficial[.]" *County Sanitation, supra,* 127 Cal.App.4th at p. 1580 (quoting CEQA Guidelines, § 15063, subd. (b)(1)). A lead agency may adopt an MND only if "there is no substantial evidence that the project will have a significant effect on the environment." CEQA Guidelines, § 15074, subd. (b).

Evidence supporting a fair argument of a significant environmental impact triggers preparation of an EIR regardless of whether the record contains contrary evidence. *League for Protection of Oakland's Architectural and Historical Resources v. City of Oakland* (1997) 52 Cal.App.4th 896, 904-905. "Where the question is the sufficiency of the evidence to support a fair argument, deference to the agency's determination is not appropriate[.]" *County Sanitation, supra,* 127 Cal.App.4th at p. 1579 (quoting *Sierra Club v. County of Sonoma* (1992) 6 Cal.App.4th 1307, 1317-1318).

Further, it is the duty of the lead agency, not the public, to conduct the proper environmental studies. "The agency should not be allowed to hide behind its own failure to gather relevant data." *Sundstrom, supra,* 202 Cal.App.3d at p. 311. "Deficiencies in the record may actually enlarge the scope of fair argument by lending a logical plausibility to a wider range of inferences." *Ibid*; see also *Gentry v. City of Murrieta* (1995) 36 Cal.App.4th 1359, 1382 (lack of study enlarges the scope of the fair argument which may be made based on the limited facts in the record).

Thus, refusal to complete recommended studies lowers the already low threshold to establish a fair argument. The court may not exercise its independent judgment on the omitted material by determining whether the ultimate decision of the lead agency would have been affected had the law been followed. *Environmental Protection Information Center v. Cal. Dept. of Forestry* (2008) 44 Cal.4th 459, 486 (internal citations and quotations omitted). The remedy for this deficiency would be for the trial court to issue a writ of mandate. *Ibid.* 2A.3 cont.

Both the review for failure to follow CEQA's procedures and the fair argument test are questions of law, thus, the de novo standard of review applies. *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 435. "Whether the agency's record contains substantial evidence that would support a fair argument that the project may have a significant effect on the environment is treated as a question of law. *Consolidated Irrigation Dist.*, *supra*, 204 Cal.App.4th at p. 207; Kostka and Zischke, Practice Under the Environmental Quality Act (2017, 2d ed.) at § 6.76.

In the MND context, courts give no deference to the agency. The agency or the court should not weigh expert testimony or decide on the credibility of such evidence—this is the EIR's responsibility. As stated in *Pocket Protectors v. City of Sacramento*:

> Unlike the situation where an EIR has been prepared, neither the lead agency nor a court may "weigh" conflicting substantial evidence to determine whether an EIR must be prepared in the first instance. Guidelines section 15064, subdivision (f)(1) provides in pertinent part: if a lead agency is presented with a fair argument that a project may have a significant effect on the environment, the lead agency shall prepare an EIR even though it may also be presented with other substantial evidence that the project will not have a significant effect. Thus, as *Claremont* itself recognized, [c]onsideration is not to be given contrary evidence supporting the preparation of a negative declaration.

(2004) 124 Cal.App.4th 903, 935 (internal citations and quotations omitted).

In cases where it is not clear whether there is substantial evidence of significant environmental impacts, CEQA mandates erring on the side of a "preference for resolving doubts in favor of environmental review." *Mejia v. City of Los Angeles* (2005) 130 Cal.App.4th 322, 332 "The foremost principle under CEQA is that the

Legislature intended the act to be interpreted in such manner as to afford the fullest possible protection to the environment within the reasonable scope of the statutory language. *Friends of Mammoth v. Bd. of Supervisors* (1972) 8 Cal.3d 247, 259.

As explained further below, the IS/MND here fails to make certain essential findings. Further, for a number of findings which the IS/MND does make, it fails to offer support with sufficient analysis and substantial evidence, or it fails to incorporate adequate mitigation measures. Therefore, there is a fair argument that the Project will have a significant effect on the environment, triggering the "low threshold" standard for preparation of an EIR.

2A.3 cont.

C. Background Concerning CEQA Exemptions.

Where a lead agency chooses to dispose of CEQA by asserting a CEQA exemption, it has a duty to support its CEQA exemption findings by substantial evidence, including evidence that there are no applicable exceptions to exemptions. This duty is imposed by CEQA and related case law. CEQA Guidelines, § 15020 (lead agency shall not knowingly release a deficient document hoping that public comments will correct the defects); see *Citizens for Environmental Responsibility v. State ex rel. 14th Dist. Agriculture Assn.* (2015) 242 Cal.App.4th 555, 568 (lead agency has the burden of demonstrating that a project falls within a categorical exemption and must support the determination with substantial evidence); accord *Assn. for Protection etc. Values v. City of Ukiah* (1991) 2 Cal.App.4th 720, 732 (lead agency is required to consider exemption exceptions where there is evidence in the record that the project might have a significant impact.)

The duty to support CEQA and exemption findings with substantial evidence is also required by the Code of Civil Procedure (CCP) and case law on administrative or traditional writs. Under the CCP, an abuse of discretion is established if the decision is unsupported by the findings, or the findings are unsupported by the evidence. CCP, § 1094.5, subd. (b). In *Topanga Assn. for a Scenic Comm. v. County of Los Angeles*, our Supreme Court held that implicit in CCP § 1094.5 is a requirement that the agency which renders the challenged decision must set forth findings to bridge the analytic gap between the raw evidence and ultimate decision or order. (1977) 11 Cal.3d 506, 515 (internal citations and quotations omitted) (hereafter, "*Topanga*"). The lead agency's findings may be determined to be sufficient if a court has no trouble under the circumstances discerning the analytic route the administrative agency traveled from evidence to action. *West Chandler Blvd. Neighborhood Assn. vs. City of Los Angeles* (2011) 198 Cal.App.4th 1506, 1521-1522 (internal citations and quotations omitted).

However, "mere conclusory findings without reference to the record are inadequate." *Ibid.* at p. 1521 (finding city council findings conclusory in violation of *Topanga*).

Further, CEQA exemptions must be narrowly construed to accomplish CEQA's environmental objectives. *Cal. Farm Bureau Federation v. Cal. Wildlife Conservation Bd.* (2006) 143 Cal.App.4th 173, 187; accord *Save Our Carmel River v. Monterey Peninsula Water Management Dist.* (2006) 141 Cal.App.4th 677, 697 ("These rules ensure that in all but the clearest cases of categorical exemptions, a project will be subject to some level of environmental review.")

2A.3 cont.

Finally, CEQA procedures reflect a preference for resolving doubts in favor of environmental review. See Pub. Res. Code, § 21080, subd. (c) (an EIR may be disposed of only if there is no substantial evidence, in light of the entire record before the lead agency, that the project may have a significant effect on the environment or revisions in the project); CEQA Guidelines, §§ 15061, subd. (b)(3) (common sense exemption only where it can be seen *with certainty*); 15063, subd. (b)(1) (prepare an EIR if the agency determines that there is substantial evidence that any aspect of the project, either individually or cumulatively, may cause a significant effect on the environment, regardless of whether the overall effect of the project is adverse or beneficial]; 15064, subd. (h) (the agency must consider cumulative impacts of past, current, and probable future projects); 15070 (a negative declaration may be prepared only if there is no substantial evidence, in light of the whole record, that the project may have a significant effect on the environment, or project revisions would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and there is no substantial evidence, in light of the whole record, that the project as revised may have a significant effect on the environment); *No Oil, supra,* 13 Cal.App.3d at pp. 83-84 (significant impacts are to be interpreted so as to afford the fullest possible protection).

III. THE PROJECT DOES NOT MEET THE CRITERIA FOR THE USE OF A SUSTAINABLE COMMUNITIES ENVIRONMENTAL ASSESSMENT.

2A.4

A. Background Regarding Sustainable Communities Environmental Assessments.

To achieve its objectives of environmental protection, CEQA has a three-tiered structure. CEQA Guidelines, § 15002, subd. (k); see also *Comm. to Save the Hollywoodland*

Specific Plan v. City of Los Angeles (2008) 161 Cal.App.4th 1168, 1185-86. First, if a project falls into an exempt category, or it can be seen with certainty that the activity in question will not have a significant effect on the environment, no further agency evaluation is required. CEQA Guidelines, § 15002, subd. (k) Second, if there is a possibility the project will have a significant effect on the environment, the agency must perform a threshold initial study. CEQA Guidelines, § 15063, subd. (a); *Comm. to Save the Hollywoodland Specific Plan v. City of Los Angeles* (2008) 161 Cal.App.4th 1168, 1185-86. If the study indicates that there is no substantial evidence that the project may cause a significant effect on the environment the agency may issue a negative declaration. CEQA Guidelines, §§ 15063, subd. (b)(2), 15070; *Comm. to Save the Hollywoodland Specific Plan v. City of Los Angeles* (2008) 161 Cal.App.4th 1168, 1185-86. Finally, if the project will have a significant effect on the environment, an EIR is required. CEQA Guidelines, § 15002, subd. (k); see also *Comm. to Save the Hollywoodland Specific Plan v. City of Los Angeles* (2008) 161 Cal.App.4th 1168, 1185-86.

2A.4 cont.

Where a Project is determined to be a "Transit Priority Project" (**TPP**) under Senate Bill 375 (**SB 375**), a slightly different framework is applied. SB 375 provides CEQA-based incentives and streamlining for certain residential, mixed-use, and transportation-oriented developments. SB 375 includes two optional CEQA streamlining options for local lead agencies.

First, under SB 375, residential and mixed-use projects that: (1) are consistent with the use designation, density, building intensity, and applicable policies specified in a California Air Resources Board (**CARB**)-approved sustainable communities strategy (**SCS**) or alternative planning strategy (**APS**) and (2) incorporate mitigation measures required by an "applicable prior environmental document," which may include the environmental impact report for the regional transportation plan, need not reference, describe or discuss growth-inducing impacts or project-specific or cumulative impacts on global warming or on the regional transportation network arising from automobiles or light-duty truck trips generated by the project. Pub, Res. Code, § 21159.28, subd. (a).

Second, TPPs that are consistent with the SCS or APS may qualify for a total CEQA exemption or a SCEA. Pub. Res. Code, §§ 21155.1-21155.2. A TPP is a specific project that must: (1) be consistent with a CARB-approved SCS or APS; (2) contain at least 50 percent residential use, and if the project contains between 26 percent and 50 percent nonresidential uses, then a floor area ratio of not less than 0.75; (3) have a minimum net density of 20 units per acre; and, (4) be located within one-half of a mile of a major

transit stop or high-quality transit corridor included in a regional transportation plan. Pub. Res. Code, § 21155.

A TPP may be reviewed through a SCEA provided, *inter alia*, that: (1) an initial study identifies "all significant or potentially significant impacts of the transit priority project . . . based on substantial evidence in light of the whole record" (Pub. Res. Code, § 21155.2, subd. (b)(1)); (2) the SCEA contains "measures that either avoid or mitigate to a level of insignificance all potentially significant or significant effects of the project required to be identified in the initial study" (Pub. Res. Code, § 21155.2, subd. (b)(2)); and, (3) "the lead agency's decision to review and approve a transit priority project with a sustainable communities environmental assessment" is "reviewed under the substantial evidence standard" (Pub. Res. Code, § 21155.2, subd. (b)(7)). A SCEA is similar to a negative declaration in that the lead agency must identify and analyze all potentially significant or significant effects of the project and mitigate them to a level of less than significant. 2A.4 cont.

Prior to acting on the SCEA, the lead agency must consider all comments received. Pub. Res. Code, § 21155.2, subd. (b)(4). According to Public Resources Code section 21155.2(b)(5), a SCEA may be approved by the lead agency after the lead agency conducted a public hearing, reviewed the comments received, and found that:

A) All potentially significant or significant effects required to be identified in the initial study have been identified and analyzed.

B) With respect to each significant effect on the environment required to be identified in the initial study, either of the following apply:

   i) Changes or alterations have been required in or incorporated into the project that avoid or mitigate the significant effects to a level of insignificance.

   ii) Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.

Pub. Res. Code, § 21155.2, subd. (b)(5).

Notably, under Public Resources Code section 21159.28(a), a SCEA does not exempt agencies from their duty to review all other impacts of the project, including but not limited to impacts to historical resources. As to all those impacts, CEQA continues to

require studies and mitigation, as well as an EIR to thoroughly assess all feasible mitigation measures and alternatives.

"The EIR is often referred to as the heart of CEQA." *Cnty. of Butte v. Dept. of Water Resources* (2022) 13 Cal.5th 612, 627 (internal citations and quotations omitted). Ideally, an EIR serves to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided. *Id.*; Pub. Res. Code, § 21002.1, subd. (a).) The document must include a description of the proposed project and its environmental setting and discussions of (1) the possible environmental effects of the project, (2) feasible measures to mitigate any significant, adverse environmental effects of the project, (3) the comparative environmental effects of a range of reasonable alternatives to the proposed project, including a "no project" alternative, and (4) the cumulative impact of the project's various environmental effects. CEQA Guidelines, §§ 15124, 15126, 15126.4, 15126.6, 15130. An EIR may also include a discussion of the economic and social effects of the project. *Id.*, § 15131. Given the role it plays and its required analysis, the EIR is commonly referred to as an "informational document." Pub. Res. Code, § 21061; CEQA Guidelines, § 15121. It serves to inform decision makers and the general public about the nature and environmental impact of a proposed project, feasible ways to reduce that impact (often through the mechanism of mitigation measures), and possible alternatives to the project. Pub. Res. Code, § 21061. *Id.* (internal citations and quotations omitted). 2A.4 cont.

Second, TTPs may qualify for a total CEQA exemption or a Sustainable Communities Environmental Assessment. Pub. Res. Code, §§ 21155.1-21155.2. First and foremost, a TPP is a specific project that must: (1) be consistent with a CARB-approved SCS or APS; (2) contain at least 50 percent residential use, and if the project contains between 26 percent and 50 percent nonresidential uses, then a floor area ratio of not less than 0.75; (3) have a minimum net density of 20 units per acre; and (4) be located **within one-half mile** of a **major transit stop** or **high-quality transit corridor** included in a regional transportation plan. Pub. Res. Code, § 21155, subds. (a)-(b) (emphases added).

If a legislative body of a city or county finds, after conducting a public hearing, that a transit priority project meets all of the requirements in subdivisions (a) and (b) and one of the requirements of subdivision (c) of Public Resources Code section 21155.1, the TPP is declared to be a sustainable communities project and will be fully exempt

from CEQA. At a minimum, the legislative body of a city or county must find that the project can be adequately served by existing utilities and that:

(1) The project site does not contain wetlands or riparian areas or have significant value as wildlife habitat,

(2) The project does not have a significant effect on historical resources,

(3) The project buildings are energy efficient,

(4) Landscaping is designed to achieve 25 percent less water usage, and

(5) The project does not present a risk of public health exposure in violation of state or federal law.

2A.4 cont.

Pub. Res. Code, § 21155.1.

Alternatively, if a TPP project does not qualify for an exemption, a TPP may be reviewed through a SCEA provided, *inter alia*, that: (1) an initial study identifies "all significant or potentially significant impacts of the transit priority project . . . based on substantial evidence in light of the whole record" (2) the SCEA shall contain "measures that either avoid or mitigate to a level of insignificance all potentially significant or significant effects of the project required to be identified in the initial study." Pub. Res. Code, § 21155.2, subds. (b)(1)-(2).

Simply put, a SCEA is similar to a negative declaration in that the lead agency must identify and analyze all potentially significant or significant effects of the project and mitigate them to a level of less than significant. Pub. Res. Code, § 21155.2, subd. (b).

A SCEA may be approved by the lead agency after conducting a public hearing, reviewing the comments received, and finding that: (A) all potentially significant or significant effects required to be identified in the initial study have been identified and analyzed, (B) with respect to each significant effect on the environment required to be identified in the initial study, either of the following apply: (i) changes or alterations have been required in or incorporated into the project that avoid or mitigate the significant effects to a level of insignificance, and (ii) those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that agency. Pub. Res. Code, §21155.2, subd. (b)(5).

The lead agency's decision to review and approve a transit priority project with a sustainable communities environmental assessment" is "reviewed under the substantial evidence standard." Pub. Res. Code, § 21155.2, subd. (b)(7). As such, any

SCEA determination or finding made by the agency has to be supported by substantial evidence, where "[s]ubstantial evidence is not argument, speculation, unsubstantiated opinion or narrative, [or] evidence that is clearly erroneous or inaccurate[.]" See Pub. Res. Code, § 21080(e)(2); see also CEQA Guidelines, § 15384, subd. (a). 2A.4 cont.

B. The Project is Not Within a Transit Priority Area Because the SCAG's HQTA Designation is neither Reliable nor Binding

Under Public Resources Code section 21099(b)(3), a transit priority area is "an area within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a transportation improvement program or applicable regional transportation plan." 2A.5

According to the SCEA, the Project Site is located within both a High-Quality Transit Area (**HQTA**) and Transit Priority Area. Yet, CEQA provides for streamlining with SCEA only if the Project is truly a TPP; i.e., first and foremost "within one-half mile of a **major transit stop** or high-quality transit **corridor** [HQCT] included in a regional transportation plan." Pub. Res. Code, § 21155, subd. (b) (emphasis added).

SCAG itself distinguishes an HQT**A** (referenced and relied upon by the City) from an HQT**C**, and the Project Site's being located within SCAG's HQT**A** has no bearing under CEQA or its Guidelines regarding TPPs—neither does that qualify as substantial evidence required for SCEA to show that the Project qualifies as a TPP as the precondition for SCEA.

A HQTA is a planning tool that is part of SCAG RTP/RTS, a regional plan. HQTAs are broadly defined as places with convenient public transit service prioritized by local jurisdictions that are suitable for housing, jobs and services growth.

Per SCAG's own *summary* and *disclaimer*:

> The High Quality Transit Areas (HQTAs) is within one half-mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours.
>
> This is the High Quality Transit Areas (HQTAs) in the SCAG Region for plan year 2045, developed for the Final Connect SoCal (the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)). SCAG's HQTA is within one-half mile from a "major transit

stop" and a "high-quality transit corridor" and developed based on the language in SB375 and codified in the CA Public Resources Code. The definitions of a "major transit stop" and a "high-quality transit corridor" are as follows:

2A.5 cont.

A. Major transit stop: A site containing an existing rail or bus rapid transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods (CA Public Resource Code Section 21064.3). It also includes major transit stops that are included in the applicable regional transportation.

B. High-quality transit corridor (HQTC): A corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

Further explanation of the methodology for identifying HQTCs and major transit stops is included in the Connect SoCal Transit Technical Report Appendix.

PLEASE NOTE that SCAG has made one modification to its methodology of HQTAs development to exclude the one-half mile areas around freeway-running HQTCs where there are no bus stops; the one-half mile areas around bus stops serving those freeway HQTCs remain.

Major transit stops and HQTCs are based on the 2045 plan year transit network of Connect SoCal. **PLEASE NOTE** that SCAG updates its inventory of planned major transit stops and HQTCs with the adoption of a new RTP/SCS, once every four years. However, transit planning studies may be completed by transit agencies on a more frequent basis than the RTP/SCS is updated by SCAG. Users should consult with the appropriate transit provider(s) to obtain the latest information on planned transit routes, stop locations, and service intervals. This data is intended for planning purposes only, and SCAG shall incur no responsibility or liability as to the completeness, currentness, or accuracy of this information. SCAG assumes no responsibility arising from use of this information by individuals, businesses, or other public entities. The

> information is provided with no warranty of any kind, expressed or implied, including but not limited to the implied warranties of merchantability and fitness for a particular purpose. Users should consult with the appropriate transit provider(s) to obtain the latest information on transit routes, stop locations, and service intervals before making determinations regarding CEQA exemption or streamlining."[6]

2A.5 cont.

SCAG claims that its GIS Map "SCAG's HQTA is within one-half mile from a "major transit stop" and a "high-quality transit corridor" and developed based on the language in SB375 and codified in the Public Resources Code.

However, for its criteria, "SCAG uses the total population of bus trips during the combined seven–hour morning and afternoon peak periods to determine the peak frequency at a bus stop. This is done for each bus route, by direction. The peak frequency is calculated by dividing 420 minutes (the seven–hour peak converted to minutes) by the total peak bus trips. This average frequency should be 15 minutes or less in order to qualify. [emphasis added]"[7]

In addition, SCAG itself does not allow for combining routes to qualify for bus interval frequencies, but does so in certain situations:

> Corridors with Multiple Overlapping Bus Routes
>
> Separate but overlapping bus routes that do not individually meet the 15-minute threshold **may not** be combined in order to qualify as an HQTC. However, based on RTTAC feedback, there are certain corridors where overlapping "line families" or local/bus rapid transit (BRT) lines are **intended** to function **as one bus route**. On these corridors, transit riders **typically** board the first bus available, whether it be a local, express, or BRT line. For these **line families** or **local/BRT corridors**, SCAG uses the combined routes to calculate the frequency."

Ibid. (emphases added).

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[6] See https://gisdata-scag.opendata.arcgis.com/datasets/SCAG::high-quality-transit-areas-hqta-2045-scag-region/about, accessed April 3, 2023 (bold emphasis orig.; underlining added).

[7] See, https://scag.ca.gov/sites/main/files/file-attachments/twg101619fullagn.pdf?1602535716

A recent ruling from the court as against the City of Los Angeles found that combining bus routes to meet the peak-hour 15-minute intervals and to thereby qualify for a major transit stop is improper and does not qualify as substantial evidence that a particular intersection is a major transit stop as defined and contemplated by CEQA and other relevant rules and regulations, including the City's own definitions of a major transit stop. See **Exhibit D**, esp. pp. 16-19. [*HI Point Neighbors' Assn. v City of Los Angeles*; Filed March 9, 2023; LASC No. 21STCP02223. 2A.5 cont.

As quoted above, SCAG provides a disclaimer and notes that its "maps and data are intended for planning purposes only. . . . [and] recommends that [l]ocal jurisdictions . . . consult with the appropriate transit provider(s) to obtain the latest information on transit routes, stop locations, and service intervals before making determinations regarding CEQA exemption[s] or streamlining." As such, these SCAG maps do not outright designate a parcel as having certain location within transit priority areas, and this data depiction is not made for purposes of evaluating a Project's environmental impacts under CEQA.

Moreover, as noted by SCAG, its maps and bus service intervals need to be verified by public agencies for currentness and accuracy. There is no evidence in the record City had performed such a verification. Our own research similarly suggests that there is no qualifying major transit stop or transit priority corridor within the ½ mile of the Project site either as required by CEQA and Public Resources Code section 21155(b).

Accordingly, the ZIMAS TPA classification, as well as SCAG's Transit Priority Area or High Quality Transit Area or Corridor, for the purposes cited in the SCEA, are irrelevant and non-binding; they are also unsupported by substantial evidence.

Therefore, the SCEA has failed to demonstrate that the Project is located within an HQTC or a major transit stop, and failed to meet the **first and foremost** critical precondition to qualify as a TPP and SCEA under CEQA. Pub. Res. Code, § 21155, subd. (b).

SB 375 requires regional planning agencies to include a sustainable communities strategy in their regional transportation plans. Gov. Code, § 65080, subd.(b)(2)(B). CEQA Guidelines section 15125(d) provides that an EIR "shall discuss any inconsistencies between the proposed project and…regional plans. Such regional

plans include . . . regional transportation plans." Thus, CEQA requires analysis of any inconsistencies between the Project and the relevant RTP/SCS plan.

In April 2016, SCAG adopted the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy ("**2016-2040 RTP/SCS**")[8], which includes policies and strategies to will help the region achieve GHG emission reductions that would reduce the region's per capita transportation emissions by eight percent by 2020 and 18 percent by 2035.[9] SCAG's RTP/SCS plan is based upon the same requirements outlined in CARB's 2017 Scoping Plan and SB 375. 2A.5 cont.

On September 3, 2020, SCAG adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, titled Connect SoCal ("**2020-2045 RTP/SCS**" or "**Connect SoCal**").[10] The 2020 RTP/SCS adopts policies and strategies aimed at reducing the region's per capita GHG emissions by 8% below 2005 per capita emissions levels by 2020 and 19% below 2005 per capita emissions levels by 2035.[11]

For both the 2016-2040 RTP/SCS and Connect SoCal, SCAG prepared Program Environmental Impact Reports (**PEIR**) that include Mitigation Monitoring and Reporting Programs (**MMRP**) that list project-level environmental mitigation measures that directly and/or indirectly relate to a project's GHG impacts and contribution to the region's GHG emissions.[12] These environmental mitigation

[8] Southern California Association of Governments (SCAG) (April 2016) The 2016-2040 Regional Transportation Plan / Sustainable Communities Strategy: A Plan for Mobility, Accessibility, Sustainability and a High Quality of Life ("SCAG 2016-2040 RTP/SCS"), *available at* https://scag.ca.gov/sites/main/files/file-attachments/f2016rtpscs.pdf?1606005557.

[9] *Id.* at pp. 8, 15, 153, 166.

[10] SCAG (Sept. 2020) Connect SoCal: The 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy of the Southern California Association of Governments (SCAG Connect SoCal"), *available at* https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176.

[11] *Id.* at xiii.

[12] SCAG (April 7, 2016) Resolution No. 16-578-1: A Resolution of the Southern California Association of Government Certifying the Final Program Environmental Impact Report Prepared for the 2016 – 2040 Regional Transportation Plan / Sustainable Communities Strategy (SCH#2015031035) and Adopting Findings of Fact, a Statement of Overriding Considerations and a Mitigation, Monitoring and Reporting Program Pursuant to the California Environmental Quality Act, Exhibit B, "Mitigation Monitoring and Reporting Program," *available at* https://scag.ca.gov/sites/main/files/file-attachments/2016fpeir_exhibitb_mmrp.pdf?1623887711; *see also* SCAG (Sept. 3, 2020) A

measures serve to help local municipalities when identifying mitigation to reduce impacts on a project-specific basis that can and should be implemented when they identify and mitigate project-specific environmental impacts.

2A.5 cont.

C. The Project May Have a Significant Effect on Historical Resources.

The proposed Project calls for the demolition of several structures. SCEA II Project Description, p. II-7. According to the Project Application filed with the City, the Applicant indicated that four structures will be removed or demolished.

According to the Cultural Resources report prepared for the SCEA, at least one structure located at the Project Site was not recommended as eligible under the California Register of Historical Resources (**CRHR**). The Cultural Resources report, however, did recommend that that structure is eligible under the City of Los Angeles Historical-Cultural Monuments (**HCM**) criteria 1 and 3, but did not recommend it to be eligible as a contributing resource to any historic district or eligible as a contributor to any potential historic district.

2A.6

Furthermore, the SCEA directly concludes that although the new construction and parts of the proposed renovation for the garage conform with many of the *Standards*, the loss of some of the materials, features, character, and spatial relationships of the historic building means the project does not fully comply with *Standards*. Therefore, the proposed Found Residences Project will result in an adverse change in the significance of a historical resource and significant impacts pursuant to CEQA Section 21084.1.

However, Public Resources Code section 21084.1 states that a project:

> [M]ay cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. For purposes of this section, an historical resource is a resource listed in, or determined to be eligible for listing in, the California Register of Historical Resources …. The fact that a resource is not listed in, or determined to be eligible for listing in, the California Register of Historical

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Resolution of the Southern California Association of Governments (SCAG) Adopting the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal) Program Environmental Impact Report (PEIR) Addendum and Approving Connect SoCal in its Entirety, Exhibit A, "Revised Mitigation Monitoring and Reporting Program, *available at* https://scag.ca.gov/sites/main/files/file-attachments/exhibit-a_connectsocal_peir_revisedmmrp.pdf?1606004474.

> Resources, not included in a local register of historical resources, or not deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1 shall not preclude a lead agency from determining whether the resources may be an historical resources for purposes of this section.

CEQA Guidelines section 15064.5(a)(4) further echoes that, stating:

> The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code sections 5020.1(j) or 5024.1.

2A.6 cont.

As such, pursuant to both Public Resources Code section 21084.1 and CEQA Guidelines section 15064.5, the fact that a project is not listed, determined to be, or registered as a historical resource does not preclude an agency's determination that the project is a historical resource.

In turn, CEQA Guidelines section 15064.5(a)(3) provides that a resource may be treated as historical and further mandates:

> Generally, a resource shall be considered by the lead agency to be "historically significant" if the resources meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code §5024.1, Title 14 CCR, Section 4852) including the following:
>
> (A) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
>
> (B) Is associated with the lives of persons important in our past;
>
> (C) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
>
> (D) Has yielded, or may be likely to yield, information important in prehistory or history.

As such, based on the fact that one of the structures to be demolished at the Project Site's was expressly found to meet at least one relevant criteria to qualify as a historical monument HCM and also would admittedly have adverse impacts on historical resources, the City's ultimate use of a SCEA for the Project here is improper given that a SCEA, unlike an EIR, does not allow for identification of all feasible mitigation measures and alternatives, including alternatives sites. Indeed, there is substantial evidence that the structure may, among other things, "embod[y] the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values." CEQA Guidelines, § 15064.5, subd. (a)(3)(C). 2A.6 cont.

Accordingly, the Project may result in significant impacts to historical resources and the City must prepare an EIR to study and mitigate those impacts.

D. <u>The Project Fails to Incorporate All Feasible Mitigation Measures Contained in SCAG's 2016-2040 RTP/SCS and Connect SoCal and Therefore the Project Cannot Be Adequately and Legally Evaluated Under a SCEA.</u> 2A.7

Section 21155.2 of the Cal. Public Resources Code requires that a transit priority project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable environmental impact reports. However, the Project's SCEA expressly rejects many, if not most, of the applicable mitigation measures identified in SCAG's 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy ("**2020-2045 RTP/SCS**" or "**Connect SoCal**"; and its respective Plan Environmental Impact Report[13] without making a feasibility determination.

First, the SCEA fails to incorporate SCAG's provided feasible mitigation measures; instead, it claims it complies with those based on its compliance with various standard regulations and would thereby reduce the Project's impacts to less than significant levels, obviating the need for SCAG's Mitigation Measures.

For example, for SCAG's Mitigation Measure PMM-GEO-1, the SCEA states that:

[13] SCAG (Sept. 3, 2020) A Resolution of the Southern California Association of Governments (SCAG) Adopting the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal) Program Environmental Impact Report (PEIR) Addendum and Approving Connect SoCal in its Entirety, Exhibit A, "Revised Mitigation Monitoring and Reporting Program, available at https://scag.ca.gov/sites/main/files/file-attachments/exhibit-a_connectsocal_peir_ revisedmmrp.pdf?1606004474 at pp. 2 – 52.

> [T]he Proposed Project already complies to this Mitigation Measure as it is subject to the building construction protocols for reducing seismic hazards as provided in the Los Angeles Municipal Code and applicable regulations. Compliance would help avoid or reduce the potentially significant effects on the potential for projects to result in the exposure of people and infrastructure to the effects of earthquakes, seismic related ground-failure, liquefaction, and seismically induced landslides, that are in the jurisdiction and responsibility of public agencies, regulatory agencies, and/or Lead agencies. The Proposed Project would also comply with all seismic standards provided in the California Building Code.

2A.7 cont.

In other words, the SCEA conflates SCAG's Mitigation Measures with simply compliance with the law and suggests that the City or the Applicant had a legal option not to comply with the law or that SCAG's Mitigation Measures contain no further requirement. As a result of such erroneous assumptions, the SCEA fails to assess the need for or the feasibility of implementing SCAG's Mitigation Measure PMM-GEO-1.

Similarly, for Mitigation Measure PMM HYD-1, the SCEA states that "[f]ull compliance with the LID Plan, SUSMP, and implementation of design-related best management practices would ensure operation of the Proposed Project would not violate any water quality standards and discharge requirements or otherwise substantially degrade water quality" and thus concludes that the Project "would result in a less than significant impact" and that "[n]o mitigation is required and this mitigation measure is not applicable."

Stated otherwise, the SCEA relies on standard and non-site-specific regulatory compliance measures to conclude that the project would have no impacts and therefore no further mitigation measures or SCAG's Mitigation Measures are required. Not so. According to CEQA Guidelines section 15064(b)(2), "[c]ompliance with the threshold does not relieve a lead agency of the obligation to consider substantial evidence indicating that the project's environmental effects may still be significant." See also *Jensen v. City of Santa Rosa* (2018) 23 Cal.App.5th 877, 885 ("Thresholds of significance are not used to determine automatically whether a given effect will or will not be significant. Instead, thresholds of significance are indicative only that an environmental effect that crosses the threshold "'will *normally* be determined to be

significant,'" while effects not crossing the threshold "'*normally* will be determined to be less than significant'" by the agency").

Moreover, it is well-settled that "[c]ompliance with the law is not enough to support a finding of no significant impact under . . . CEQA." *Californians for Alternatives to Toxics v. Department of Food & Agriculture* (2005) 136 Cal.App.4th 1, 15-17 (finding that a lead agency "abused its discretion by relying on DPR's regulatory scheme as a substitute for performing its own evaluation of the environmental impacts of using pesticides."); see also *Ebbetts Pass Forest Watch v Dept. of Forestry & Fire Protection* (2008) 43 Cal. App. 4th 936, 956 (fact that Department of Pesticide Regulation had assessed environmental effects of certain herbicides in general did not excuse failure to assess effects of their use for specific timber harvesting project); *California Clean Energy Committee v. City of Woodland* (2014) 225 Cal.App.4th 173, 210-211 ("Although the Building Code applies to all nonresidential buildings, it does not extend beyond the buildings themselves. It addresses the building's envelope, exterior lighting, and signage"). 2A.7 cont.

Further, bare conclusions or opinions of the agency are not sufficient to satisfy an agency's obligation under CEQA to support its environmental findings. *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 403-04 ("To facilitate CEQA's informational role, the EIR must contain facts and analysis, not just the agency's bare conclusions or opinions. . . . [to] enable[] the decision-makers and the public to make an 'independent, reasoned judgment' about a proposed project."); accord *Concerned Citizens of Costa Mesa, Inc. v. 32nd Dist. Agricultural Assn.* (1986) 42 Cal.3d 929, 935 (quoting *Santiago Cnty. Water Dist. v. Cnty. of Orange* (1981) 118 Cal.App.3d 818, 831).

Second and similarly, the SCEA unlawfully fails to incorporate feasible mitigation measures simply on the basis that the SCEA did not identify a potentially significant impact. For example, for PMM AES-1, the SCEA concludes that the Mitigation Measures is not applicable and finds that the "proposed project's aesthetic impacts shall not be considered significant impacts on the environment pursuant to PRC § 21099." Similarly, for Mitigation Measure PMM AQ-1, the SCEA states that upon compliance with the South Coast Air Quality Management District (**SCAQMD**), the Mitigation Measure's requirements would be satisfied and concludes that because the impacts on Air Quality were found to be less than significant, the Mitigation Measure is not required.

The Project is required to incorporate all of SCAG's feasible mitigation measures, regardless of whether the SCEA itself identifies a potentially significant impact. Public Resources Code section 21155.2(a) is unambiguous in stating that transit priority projects must incorporate "all feasible mitigation measures, performance standards or criteria set forth in prior environmental impact reports," irrespective of whether the SCEA finds a less than significant impact. The SCEA fails to address the feasibility of measures not incorporated into the Project, and thus fails to meet the requirements of Public Resources Code section 21155.2. 2A.7 cont.

Section 21155.2 of the Cal. Public Resources Code requires that a TPP incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable environmental impact reports. However, the Project's SCEA fails to incorporate many applicable mitigation measures identified in the 2016-2040 RTP/SCS, 2020-2045 RTP/SCS ("**RTP/SCS Plans**") and their respective EIRs without making a feasibility determination. This includes the following identified mitigation measures, among others:

- 2016-2040 RTP/SCS[14]
  - MM-AES-1(b)
    - Use a palette of colors, textures, building materials that are graffiti-resistant, and/or plant materials that complement the surrounding landscape and development.
    - Use contour grading to better match surrounding terrain. Contour edges of major cut-and-fill to provide a more natural looking finished profile.
    - Use alternating facades to "break up" large facades and provide visual interest.

2A.8

[14] Southern California Association of Governments (April 7, 2016) Resolution No. 16-578-1: A Resolution of the Southern California Association of Government Certifying the Final Program Environmental Impact Report Prepared for the 2016 – 2040 Regional Transportation Plan / Sustainable Communities Strategy (SCH#2015031035) and Adopting Findings of Fact, a Statement of Overriding Considerations and a Mitigation, Monitoring and Reporting Program Pursuant to the California Environmental Quality Act, Exhibit B, "Mitigation Monitoring and Reporting Program," *available at* https://scag.ca.gov/sites/main/files/file-attachments/2016fpeir_exhibitb_mmrp.pdf?1623887711 at pp. 11 through 63.

- Design new corridor landscaping to respect existing natural and man-made features and to complement the dominant landscaping of the surrounding areas.
- Replace and renew landscaping along corridors with road widenings, interchange projects, and related improvements.
- Retain or replace trees bordering highways, so that clear-cutting is not evident.
- Provide new corridor landscaping that respects and provides appropriate transition to existing natural and man-made features and is complementary to the dominant landscaping or native habitats of surrounding areas.
- Implement design guidelines, local policies, and programs aimed at protecting views of scenic corridors and avoiding visual intrusions in design of projects to minimize contrasts in scale and massing between the project and surrounding natural forms and developments. Avoid, if possible, large cuts and fills when the visual environment (natural or urban) would be substantially disrupted. Site or design of projects should minimize their intrusion into important viewsheds and use contour grading to better match surrounding terrain.

2A.8 cont.

- MM-AES-3(b)
  - Minimize contrasts in scale and massing between the projects and surrounding natural forms and development, minimize their intrusion into important viewsheds, and use contour grading to better match surrounding terrain in accordance with county and city hillside ordinances, where applicable.
  - Design landscaping along highway corridors to add significant natural elements and visual interest to soften the hard-edged, linear transportation corridors.
  - Require development of design guidelines for projects that make elements of proposed buildings/facilities visually compatible, or minimize visibility of changes in visual quality or character through

use of hardscape and softscape solutions. Specific measures to be addressed include setback buffers, landscaping, color, texture, signage, and lighting criteria.

- Design projects consistent with design guidelines of applicable general plans.
- Apply development standards and guidelines to maintain compatibility with surrounding natural areas, including site coverage, building height and massing, building materials and color, landscaping, site grading, and so forth in accordance with general plans and adopted design guidelines, where applicable.
- Require that sites are kept in a blight/nuisance-free condition. Remove blight or nuisances that compromise visual character or visual quality of project areas including graffiti abatement, trash removal, landscape management, maintenance of signage and billboards in good condition, and replace compromised native vegetation and landscape

2A.8 cont.

- MM-AES-4(b)
  - Use lighting fixtures that are adequately shielded to a point below the light bulb and reflector and that prevent unnecessary glare onto adjacent properties.
  - Restrict the operation of outdoor lighting for construction and operation activities in accordance with local regulations.
  - Use high pressure sodium and/or cut-off fixtures instead of typical mercury-vapor fixtures for outdoor lighting.
  - Use unidirectional lighting to avoid light trespass onto adjacent properties.
  - Design exterior lighting to confine illumination to the project site, and/or to areas which do not include light-sensitive uses.
  - Provide structural and/or vegetative screening from light-sensitive uses.

- Shield and direct all new street and pedestrian lighting away from light-sensitive off-site uses.
- Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces.
- Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties.

2A.8 cont.

- MM-AF-1(b):
  - For projects that require approval or funding by the USDOT, comply with Section 4(f) U.S. Department of Transportation Act of 1966 (USDOT Act).
  - Project relocation or corridor realignment to avoid Prime Farmland, Unique Farmland, or Farmland of Local or Statewide Importance.
  - Maintain and expand agricultural land protections such as urban growth boundaries.
  - Support the acquisition or voluntary dedication of agriculture conservation easements and other programs that preserve agricultural lands, including the creation of farmland mitigation banks.
  - Provide for mitigation fees to support a mitigation bank that invests in farmer education, agricultural infrastructure, water supply, marketing, etc. that enhance the commercial viability of retained agricultural lands.
  - Include underpasses and overpasses at reasonable intervals to maintain property access.
  - Use berms, buffer zones, setbacks, and fencing to reduce conflicts between new development and farming uses and protect the functions of farmland.

- Ensure individual projects are consistent with federal, state, and local policies that preserve agricultural lands and support the economic viability of agricultural activities, as well as policies that provide compensation for property owners if preservation is not feasible.
- Contact the California Department of Conservation and each county's Agricultural Commissioner's office to identify the location of prime farmlands and lands that support crops considered valuable to the local or regional economy and evaluate potential impacts to such lands using the land evaluation and site assessment (LESA) analysis method (CEQA Guidelines §21095), as appropriate. Use conservation easements or the payment of in-lieu fees to offset impacts.

2A.8 cont.

- MM-AF-2(b):
  - Project relocation or corridor realignment to avoid lands in Williamson Act contracts.
  - Establish conservation easements consistent with the recommendations of the Department of Conservation, or 20-year Farmland Security Zone contracts (Government Code Section 51296 et seq.), 10-year Williamson Act contracts (Government Code Section 51200 et seq.), or use of other conservation tools available from the California Department of Conservation Division of Land Resource Protection.
  - Prior to final approval of each project, encourage enrollments of agricultural lands for counties that have Williamson Act programs, where applicable.
- MM-AIR-2(b):
  - Minimize land disturbance.
  - Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas.

- Suspend grading and earth moving when wind gusts exceed 25 miles per hour unless the soil is wet enough to prevent dust plumes.
- Cover trucks when hauling dirt.
- Stabilize the surface of dirt piles if not removed immediately.
- Limit vehicular paths on unpaved surfaces and stabilize any temporary roads.
- Minimize unnecessary vehicular and machinery activities.
- Revegetate disturbed land, including vehicular paths created during construction to avoid future off-road vehicular activities.
- On Caltrans projects, Caltrans Standard Specifications 10-Dust Control, 17-Watering, and 18-Dust Palliative shall be incorporated into project specifications.
- Require contractors to assemble a comprehensive inventory list (i.e., make, model, engine year, horsepower, emission rates) of all heavy-duty off-road (portable and mobile) equipment (50 horsepower and greater) that could be used an aggregate of 40 or more hours for the construction project. Prepare a plan for approval by the applicable air district demonstrating achievement of the applicable percent reduction for a CARB-approved fleet.
- Ensure that all construction equipment is properly tuned and maintained.
- Provide an operational water truck on-site at all times. Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas. Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway.
- Project sponsors should ensure to the extent possible that construction activities utilize grid-based electricity and/or onsite renewable electricity generation rather than diesel and/or gasoline powered generators.

2A.8 cont.

- Develop a traffic plan to minimize traffic flow interference from construction activities. The plan may include advance public notice of routing, use of public transportation, and satellite parking areas with a shuttle service. Schedule operations affecting traffic for off-peak hours. Minimize obstruction of through-traffic lanes. Provide a flag person to guide traffic properly and ensure safety at construction sites.

2A.8 cont.

- As appropriate, require that portable engines and portable engine-driven equipment units used at the project work site, with the exception of on-road and off-road motor vehicles, obtain CARB Portable Equipment Registration with the state or a local district permit. Arrange appropriate consultations with the CARB or the District to determine registration and permitting requirements prior to equipment operation at the site.
- Implement EPA's National Clean Diesel Program.
- Diesel- or gasoline-powered equipment shall be replaced by lowest emitting feasible for each piece of equipment from among these options: electric equipment whenever feasible, gasoline-powered equipment if electric infeasible.
- On-site electricity shall be used in all construction areas that are demonstrated to be served by electricity.
- If cranes are required for construction, they shall be rated at 200 hp or greater equipped with Tier 4 or equivalent engines.
- Use alternative diesel fuels, such as Clean Fuels Technology (water emulsified diesel fuel) or O2 diesel ethanol-diesel fuel (O2 Diesel) in existing engines
- Convert part of the construction truck fleet to natural gas.
- Include "clean construction equipment fleet", defined as a fleet mix cleaner than the state average, in all construction contracts.
- Fuel all off-road and portable diesel powered equipment with ARB-certified motor vehicle diesel fuel (non-taxed version suitable for use off-road).

- Use electric fleet or alternative fueled vehicles where feasible including methanol, propane, and compressed natural gas.
- Use diesel construction equipment meeting ARB's Tier 4 certified engines or cleaner off-road heavy-duty diesel engines and comply with State off-road regulation.
- Use on-road, heavy-duty trucks that meet the ARB's 2007 or cleaner certification standard for on-road diesel engines, and comply with the State on-road regulation.

2A.8 cont.

- Use idle reduction technology, defined as a device that is installed on the vehicle that automatically reduces main engine idling and/or is designed to provide services, e.g., heat, air conditioning, and/or electricity to the vehicle or equipment that would otherwise require the operation of the main drive engine while the vehicle or equipment is temporarily parked or is stationary.
- Minimize idling time either by shutting off equipment when not in use or limit idling time to 3 minutes Signs shall be posted in the designated queuing areas and/or job sites to remind drivers and operators of the 3 minute idling limit. The construction contractor shall maintain a written idling policy and distribute it to all employees and subcontractors. The on-site construction manager shall enforce this limit.
- Prohibit diesel idling within 1,000 feet of sensitive receptors.
- Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors.
- The number of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time.
- The engine size of construction equipment shall be the minimum practical size.
- Catalytic converters shall be installed on gasoline-powered equipment.

- Signs shall be posted in designated queuing areas and job sites to remind drivers and operators of the idling limit.
- Construction worker trips shall be minimized by providing options for carpooling and by providing for lunch onsite.
- Use new or rebuilt equipment.
- Maintain all construction equipment in proper working order, according to manufacturer's specifications. The equipment must be check by an ASE-certified mechanic and determined to be running in proper condition before it is operated.
- Use low rolling resistance tires on long haul class 8 tractor-trailers.
- Suspend all construction activities that generate air pollutant emissions during air alerts.
- Install a CARB-verified, Level 3 emission control device, e.g., diesel particulate filters, on all diesel engines.

2A.8 cont.

- MM-BIO-1(b):
  - Require project design to avoid occupied habitat, potentially suitable habitat, and designated critical habitat, wherever practicable and feasible.
  - Where avoidance is determined to be infeasible, provide conservation measures to fulfill the requirements of the applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal Endangered Species Act or Section 2081 of the California Endangered Species Act to support issuance of an Incidental take permit. A wide variety of conservation strategies have been successfully used in the SCAG region to protect the survival and recovery in the wild of federally and state-listed endangered species including the bald eagle:
    - Avoidance strategies
      Contribution of in-lieu fees o Use of mitigation bank credits
    - Funding of research and recovery efforts

- Habitat restoration
- Conservation easements
- Permanent dedication of habitat
- Other comparable measures

2A.8 cont.

- Design projects to avoid desert native plants, salvage and relocate desert native plants, and/or pay in lieu fees to support off-site long-term conservation strategies.
- Develop and implement a Worker Awareness Program (environmental education) to inform project workers of their responsibilities in regards to avoiding and minimizing impacts on sensitive biological resources.
- Appoint an Environmental Inspector to monitor implementation of mitigation measures.
- Schedule construction activities to avoid sensitive times for biological resources (e.g., steelhead spawning periods during the winter and spring, nesting bird season) and to avoid the rainy season when erosion and sediment transport is increased.
- Conduct pre-construction monitoring to delineate occupied sensitive species' habitat to facilitate avoidance.
- Where projects are determined to be within suitable habitat of listed or sensitive species that have specific field survey protocols or guidelines outlined by the USFWS, CDFW, or other local agency, conduct preconstruction surveys that follow applicable protocols and guidelines and are conducted by qualified and/or certified personnel.

- MM-BIO-2(b):
  - Consult with the USFWS and NMFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal Endangered Species Act.

- Consult with the USFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal Endangered Species Act and any additional species afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-county area: Angeles, Cleveland, Los Padres, and San Bernardino.

2A.8 cont.

- Consult with the CDFW where such state-designated sensitive or riparian habitats provide potential or occupied habitat for state-listed rare, threatened, and endangered species afforded protection pursuant to the California Endangered Species Act, or Fully-Protected Species afforded protection pursuant to the State Fish and Game Code.
- Consult with the CDFW pursuant to the provisions of Section 1600 of the State Fish and Game Code as they relate to lakes and streambeds.
- Consult with the USFWS, USFS, CDFW, and counties and cities in the SCAG region, where state-designated sensitive or riparian habitats are occupied by birds afforded protection pursuant to the Migratory Bird Treaty Act during the breeding season.
- Consult with the CDFW for state-designated sensitive or riparian habitats where fur-bearing mammals, afforded protection pursuant to the provisions of the State Fish and Game Code for fur-beaming mammals, are actively using the areas in conjunction with breeding activities.
- Utilize applicable and CDFW approved plant community classification resources during delineation of sensitive communities and invasive plants including, but not limited to, the Manual of California Vegetation, the California Invasive Plant Inventory Database, and the Orange County California Native Plant Society (OCCNPS) Emergent Invasive Plant Management Program, where appropriate.

- Encourage project design to avoid sensitive natural communities and riparian habitats, wherever practicable and feasible. Where avoidance is determined to be infeasible, develop sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) to protect sensitive natural communities and riparian habitats.
- Install fencing and/or mark sensitive habitat to be avoided during construction activities.
- Salvage and stockpile topsoil (the surface material from 6 to 12 inches deep) and perennial plants for use in restoring native vegetation to all areas of temporary disturbance within the project area.
- Revegetate with appropriate native vegetation following the completion of construction activities.
- Complete habitat enhancement (e.g., through removal of non-native invasive wetland species and replacement with more ecologically valuable native species).
- Use Best Management Practices (BMPs) at construction sites to minimize erosion and sediment transport from the area. BMPs include encouraging growth of vegetation in disturbed areas, using straw bales or other silt-catching devices, and using settling basins to minimize soil transport.

2A.8 cont.

- MM-BIO-3(b)
  - Require project design to avoid federally protected wetlands consistent with the provisions of Section 404 of the Clean Water Act, wherever practicable and feasible.
  - Where the Lead Agency has identified that a project, or other regionally significant project, has the potential to impact other wetlands or waters not protected under Section 404 of the Clean Water Act, seek comparable coverage for these wetlands and waters in consultation with the USACOE and applicable Regional Water Quality Control Boards (RWQCB).

- Where avoidance is determined to be infeasible, develop sufficient conservation measures to fulfill the requirements of the applicable authorization for impacts to federally protected wetlands to support issuance of a permit under Section 404 of the Clean Water Act as administered by the USACOE. The use of an authorized Nationwide Permit or issuance of an individual permit requires the project applicant to demonstrate compliance with the USACOE's Final Compensatory Mitigation Rule. The USACOE reviews projects to ensure environmental impacts to aquatic resources are avoided or minimized as much as possible. Consistent with the administration's performance standard of "no net loss of wetlands" a USACOE permit may require a project proponent to restore, establish, enhance or preserve other aquatic resources in order to replace those affected by the proposed project. This compensatory mitigation process seeks to replace the loss of existing aquatic resource functions and area. Project proponents required to complete mitigation are encouraged to use a watershed approach and watershed planning information. The new rule establishes performance standards, sets timeframes for decision making, and to the extent possible, establishes equivalent requirements and standards for the three sources of compensatory mitigation:

  - Permittee-responsible mitigation
  - Contribution of in-lieu fees
  - Use of mitigation bank credits
  - Require review of construction drawings by a certified wetland delineator as part of each project-specific environmental analysis to determine whether wetlands will be affected and, if necessary, perform a formal wetland delineation.

2A.8 cont.

- MM-BIO-4(b):
  - Consult with the USFWS, USFS, CDFW, and counties and cities in the SCAG region, where impacts to birds afforded protection

pursuant to the Migratory Bird Treaty Act during the breeding season may occur.

- Consult with the USFS where impacts to migratory wildlife corridors may occur in an area afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-County area: Angeles, Cleveland, Los Padres, and San Bernardino.

2A.8 cont.

- Consult with counties, cities, and other local organizations when impacts may occur to open space areas that have been designated as important for wildlife movement.
- Prohibit construction activities within 500 feet of occupied breeding areas for wildlife afforded protection pursuant to Title 14 § 460 of the California Code of Regulations protecting fur-bearing mammals, during the breeding season.
- Prohibit clearing of vegetation and construction within the peak avian breeding season (February 1st through September 1st), where feasible.
- Conduct weekly surveys to identify active raptor and other migratory nongame bird nests by a qualified biologist with experience in conducting breeding bird surveys within three days prior to the work in the area from February 1 through August 31.
- Prohibit construction activities with 300 feet (500 feet for raptors) of occupied nests of birds afforded protection pursuant to the Migratory Bird Treaty Act, during the breeding season. Delineate the non-disturbance buffer by temporary fencing and keep the buffer in place until construction is complete or the nest is no longer active. No construction shall occur within the fenced nest zone until the young have fledged, are no longer being fed by the parents, have left the nest, and will no longer be impacted by the project. Reductions or expansions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.

- Ensure that suitable nesting sites for migratory nongame native bird species protected under the Migratory Bird Treaty Act and/or trees with unoccupied raptor nests should only be removed prior to February 1, or following the nesting season.
- Conduct site-specific analyses of opportunities to preserve or improve habitat linkages with areas on- and off-site. Analyze habitat linkages/wildlife movement corridors on a broader and cumulative impact analysis scale to avoid adverse impacts from linear projects that have potential for impacts on a broader scale or critical narrow choke points that could reduce function of recognized movement corridors on a larger scale. Require review of construction drawings and habitat connectivity mapping provided by the CDFW or CNDDB by a qualified biologist to determine the risk of habitat fragmentation.

2A.8 cont.

- Pursue mitigation banking to preserve habitat linkages and corridors (opportunities to purchase, maintain, and/or restore offsite habitat).
- Demonstrate that proposed projects would not adversely affect movement of any native resident or migratory fish or wildlife species, wildlife movement corridors, or wildlife nursery sites through the incorporation of avoidance strategies into project design, wherever practicable and feasible.
- Evaluate the potential for overpasses, underpasses, and culverts in cases where a roadway or other transportation project may interrupt the flow of species through their habitat. Provide wildlife crossings in accordance with proven standards, such as FHWA's Critter Crossings or Ventura County Mitigation Guidelines and in consultation with wildlife corridor authorities with sufficient knowledge of both regional and local wildlife corridors, and at locations useful and appropriate for the species of concern.
- Install wildlife fencing where appropriate to minimize the probability of wildlife injury due to direct interaction between wildlife and roads or construction.

- Establish native vegetation and facilitate the enhancement and maintenance of biological diversity within existing habitat pockets in urban environments that provide connectivity to large-scale habitat areas.
- Where avoidance is determined to be infeasible, design sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) and in accordance with the respective counties and cities general plans to establish plans to mitigate for the loss of fish and wildlife movement corridors and/or wildlife nursery sites. The consideration of conservation measures may include the following measures, in addition to the measures outlined in MM-BIO-1(b), where applicable:
  - Wildlife movement buffer zones
  - Corridor realignment
  - Appropriately spaced breaks in center barriers
  - Stream rerouting
  - Culverts
  - Creation of artificial movement corridors such as freeway under- or overpasses
  - Other comparable measures
- Where the Lead Agency has identified that a RTP/SCS project, or other regionally significant project, has the potential to impact other open space or nursery site areas, seek comparable coverage for these areas in consultation with the USFWS, CDFW, NMFS, or other local jurisdictions.
- Project sponsors should emphasize that urban habitats and the plant and wildlife species they support are indeed valuable, despite the fact they are located in urbanized (previously disturbed) areas. Established habitat connectivity and wildlife corridors in these urban ecosystems will likely be impacted with further urbanization,

2A.8 cont.

as proposed in the Project. Appropriate mitigation measures should be proposed, developed, and implemented in these sensitive urban microhabitats to support or enhance the rich diversity of urban plant and wildlife species.

- Establish native vegetation within habitat pockets or the "wildling of urbanized habitats" that facilitate the enhancement and maintenance of biological diversity in these areas. These habitat pockets, as the hopscotch across an urban environment, provide connectivity to large-scale habitat areas.

2A.8 cont.

- MM-BIO-5(b):
  - Consult with the appropriate local agency responsible for the administration of the policy or ordinance protecting biological resources.
  - Prioritize retention of trees on-site consistent with local regulations. Provide adequate protection during the construction period for any trees that are to remain standing, as recommended by a certified arborist.
  - If specific project area trees are designated as "Protected Trees," "Landmark Trees," or "Heritage Trees," obtain approval for encroachment or removals through the appropriate entity, and develop appropriate mitigation measures at that time, to ensure that the trees are replaced. Mitigation trees shall be locally collected native species.
  - Before the start of any clearing, excavation, construction or other work on the site, securely fence off every protected tree deemed to be potentially endangered by said site work. Keep such fences in place for duration of all such work. Clearly mark all trees to be removed. Establish a scheme for the removal and disposal of logs, brush, earth and other debris that will avoid injury to any protected tree.
  - Where proposed development or other site work could encroach upon the protected perimeter of any protected tree, incorporate

special measures to allow the roots to breathe and obtain water and nutrients. Minimize any excavation, cutting, filing, or compaction of the existing ground surface within the protected perimeter. Require that no change in existing ground level occur from the base of any protected tree at any time. Require that no burning or use of equipment with an open flame occur near or within the protected perimeter of any protected tree.

- Require that no storage or dumping of oil, gas, chemicals, or other substances that may be harmful to trees occur from the base of any protected trees, or any other location on the site from which such substances might enter the protected perimeter. Require that no heavy construction equipment or construction materials be operated or stored within a distance from the base of any protected trees. Require that wires, ropes, or other devices not be attached to any protected tree, except as needed for support of the tree. Require that no sign, other than a tag showing the botanical classification, be attached to any protected tree.

2A.8 cont.

- Thoroughly spray the leaves of protected trees with water periodically during construction to prevent buildup of dust and other pollution that would inhibit leaf transpiration.
- If any damage to a protected tree should occur during or as a result of work on the site, the appropriate local agency will be immediately notified of such damage. If, such tree cannot be preserved in a healthy state, require replacement of any tree removed with another tree or trees on the same site deemed adequate by the local agency to compensate for the loss of the tree that is removed.
- Remove all debris created as a result of any tree removal work from the property within two weeks of debris creation, and such debris shall be properly disposed of in accordance with all applicable laws, ordinances, and regulations.
- Design projects to avoid conflicts with local policies and ordinances protecting biological resources.

- Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the applicable policy or ordinance shall be developed, such as to support issuance of a tree removal permit. The consideration of conservation measures may include:
  - Avoidance strategies
  - Contribution of in-lieu fees
  - Planting of replacement trees at a minimum ratio of 2:1
  - Re-landscaping areas with native vegetation post-construction
  - Other comparable measures

2A.8 cont.

- MM-BIO-6(b):
  - Consult with the appropriate federal, state, and/or local agency responsible for the administration of HCPs, NCCPs or other conservation programs.
  - Wherever practicable and feasible, the project shall be designed to avoid through project design lands preserved under the conditions of an HCP, NCCP, or other conservation program.
  - Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the HCP and/or NCCP or other conservation program, which would include but not be limited to applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal Endangered Species Act or Section 2081 of the California Endangered Species Act, shall be developed to support issuance of an Incidental take permit or any other permissions required for development within the HCP/NCCP boundaries. The consideration of additional conservation measures would include the measures outlined in MM-BIO-1(b), where applicable.
- MM-CUL-1(b):
  - Obtain review by a qualified geologist or paleontologist to determine if the project has the potential to require excavation or

blasting of parent material with a moderate to high potential to contain unique paleontological or resources, or to require the substantial alteration of a unique geologic feature.

- Avoid exposure or displacement of parent material with a moderate to high potential to yield unique paleontological resources.
- Where avoidance of parent material with a moderate to high potential to yield unique paleontological resources is not feasible:
- All on-site construction personnel receive Worker Education and Awareness Program (WEAP) training to understand the regulatory framework that provides for protection of paleontological resources and become familiar with diagnostic characteristics of the materials with the potential to be encountered.
- Prepare a Paleontological Resource Management Plan (PRMP) to guide the salvage, documentation and repository of representative samples of unique paleontological resources encountered during construction. If unique paleontological resources are encountered during excavation or blasting, use a qualified paleontologist to oversee the implementation of the PRMP.
- Monitor blasting and earth-moving activities in parent material, with a moderate to high potential to yield unique paleontological resources using a qualified paleontologist or archeologists cross-trained in paleontology to determine if unique paleontological resources are encountered during such activities, consistent with the specified or comparable protocols.
- Identify where excavation and earthmoving activity is proposed in a geologic unit having a moderate or high potential for containing fossils and specify the need for a paleontological or archeological (cross-trained in paleontology) to be present during earth-moving activities or blasting in these areas.

2A.8 cont.

- Avoid routes and project designs that would permanently alter unique features with archaeological and/or paleontological significance.
- Salvage and document adversely affected resources sufficient to support ongoing scientific research and education.

2A.8 cont.

- MM-CUL-2(b):
  - Pursuant to CEQA Guidelines Section 15064.5, conduct a record search at the appropriate Information Center to determine whether the project area has been previously surveyed and whether historic resources were identified.
  - Obtain a qualified architectural historian to conduct historic architectural surveys as recommended by the Information Center. In the event the records indicate that no previous survey has been conducted, the Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for historical resources within 1,000 feet of the project.
  - Comply with Section 106 of the National Historic Preservation Act including, but not limited to, projects for which federal funding or approval is required for the individual project. This law requires federal agencies to evaluate the impact of their actions on resources included in or eligible for listing in the National Register. Federal agencies must coordinate with the State Historic Preservation Officer in evaluating impacts and developing mitigation. These mitigation measures may include, but are not limited to the following:
  - Employ design measures to avoid historical resources and undertake adaptive reuse where appropriate and feasible. If resources are to be preserved, as feasible, carry out the maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction in a manner consistent with the Secretary of the Interior's Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic

Buildings. If resources would be impacted, impacts should be minimized to the extent feasible.

- Where feasible, noise buffers/walls and/or visual buffers/landscaping should be constructed to preserve the contextual setting of significant built resources.
- Secure a qualified environmental agency and/or architectural historian, or other such qualified person to document any significant historical resource(s), by way of historic narrative, photographs, and architectural drawings, as mitigation for the effects of demolition of a resource.
- Consult with the Native American Heritage Commission to determine whether known sacred sites are in the project area, and identify the Native American(s) to contact to obtain information about the project site.
- Prior to construction activities, obtain a qualified archaeologist to conduct a record search at the appropriate Information Center of the California Archaeological Inventory to determine whether the project area has been previously surveyed and whether resources were identified.
- Prior to construction activities, obtain a qualified archaeologist or architectural historian (depending on applicability) to conduct archaeological and/or historic architectural surveys as recommended by the Information Center. In the event the records indicate that no previous survey has been conducted, the Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for archaeological resources.
- If a record search indicates that the project is located in an area rich with cultural materials, retain a qualified archaeologist to monitor any subsurface operations, including but not limited to grading, excavation, trenching, or removal of existing features of the subject property.

2A.8 cont.

- Conduct construction activities and excavation to avoid cultural resources (if identified). If avoidance is not feasible, further work may be needed to determine the importance of a resource. Retain a qualified archaeologist familiar with the local archaeology, and/or as appropriate, an architectural historian who should make recommendations regarding the work necessary to determine importance. If the cultural resource is determined to be important under state or federal guidelines, impacts on the cultural resource will need to be mitigated.
- Stop construction activities and excavation in the area where cultural resources are found until a qualified archaeologist can determine the importance of these resources

2A.8 cont.

- MM-CUL-4(b):
  - In the event of discovery or recognition of any human remains during construction or excavation activities associated with the project, in any location other than a dedicated cemetery, cease further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the coroner of the county in which the remains are discovered has been informed and has determined that no investigation of the cause of death is required.
  - If any discovered remains are of Native American origin:
  - Contact the County Coroner to contact the Native American Heritage Commission to ascertain the proper descendants from the deceased individual. The coroner should make a recommendation to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods. This may include obtaining a qualified archaeologist or team of archaeologists to properly excavate the human remains.
  - If the Native American Heritage Commission is unable to identify a descendant, or the descendant failed to make a recommendation within 24 hours after being notified by the commission, obtain a

Native American monitor, and an archaeologist, if recommended by the Native American monitor, and rebury the Native American human remains and any associated grave goods, with appropriate dignity, on the property and in a location that is not subject to further subsurface disturbance where the following conditions occur:

2A.8 cont.

- The Native American Heritage Commission is unable to identify a descendent;
- The descendant identified fails to make a recommendation; or
- The landowner or their authorized representative rejects the recommendation of the descendant, and the mediation by the NAHC fails to provide measures acceptable to the landowner.
- MM-EN-2(b):
- Integrate green building measures consistent with CALGreen (California Building Code Title 24) into project design including:
- Use energy efficient materials in building design, construction, rehabilitation, and retrofit.
- Install energy-efficient lighting, heating, and cooling systems (cogeneration); water heaters; appliances; equipment; and control systems.
- Reduce lighting, heating, and cooling needs by taking advantage of light colored roofs, trees for shade, and sunlight.
- Incorporate passive environmental control systems that account for the characteristics of the natural environment.
- Use high-efficiency lighting and cooking devices. o Incorporate passive solar design.
- Use high-reflectivity building materials and multiple glazing.
- Prohibit gas-powered landscape maintenance equipment.
- Install electric vehicle charging stations.
- Reduce wood burning stoves or fireplaces.

- Provide bike lanes accessibility and parking at residential developments.

- MM-GEO-1(b):
  - Consistent with Section 4.7.2 of the Alquist-Priolo Earthquake Fault Zoning Act, conduct a geologic investigation to demonstrate that proposed buildings would not be constructed across active faults. An evaluation and written report of a specific site can and should be prepared by a licensed geologist. If an active fault is found and unfit for human occupancy over the fault, place a setback of 50 feet from the fault.
  - Use site-specific fault identification investigations conducted by licensed geotechnical professionals in accordance with the requirements of the Alquist-Priolo Act, as well as any applicable Caltrans regulations that exceed or reasonably replace the requirements of the Act to either determine that the anticipated risk to people and property is at or below acceptable levels or site-specific measures have been incorporated into the project design, consistent with the CBC and UBC.
  - Ensure that projects located within or across Alquist-Priolo Zones comply with design requirements provided in Special Publication 117, published by the California Geological Survey, as well as relevant local, regional, state, and federal design criteria for construction in seismic areas.
  - Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that projects are designed in accordance with county and city code requirements for seismic ground shaking. With respect to design, consider seismicity of the site, soil response at the site, and dynamic characteristics of the structure, in compliance with the appropriate California Building Code and State of California design standards for construction in or near fault zones, as well as all standard design, grading, and construction practices in order to avoid or reduce geologic hazards.

2A.8 cont.

- Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that site-specific geotechnical investigations conducted by a qualified geotechnical expert be required prior to preparation of project designs. These investigations shall identify areas of potential expansive soils and recommend remedial geotechnical measures to eliminate any problems. Recommended corrective measures, such as structural reinforcement and replacing soil with engineered fill, shall be implemented in project designs. Geotechnical investigations identify areas of potential failure and recommend remedial geotechnical measures to eliminate any problems.

2A.8 cont.

- Adhere to design standards described in the CBC and all standard geotechnical investigation, design, grading, and construction practices to avoid or reduce impacts from earthquakes, ground shaking, ground failure, and landslides.
- Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, design projects to avoid geologic units or soils that are unstable, expansive soils and soils prone to lateral spreading, subsidence, liquefaction, or collapse wherever feasible.

o MM-GEO-2(b):

- Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that site-specific geotechnical investigations conducted by a qualified geotechnical expert are conducted to ascertain soil types prior to preparation of project designs. These investigations can and should identify areas of potential failure and recommend remedial geotechnical measures to eliminate any problems.
- Consistent with the requirements of the State Water Resources Control Board (SWRCB) for projects over one acre in size, obtain coverage under the General Construction Activity Storm Water Permit (General Construction Permit) issued by the SWRCB and conduct the following:

- File a Notice of Intent (NOI) with the SWRCB.
- Prepare a stormwater pollution prevention plan (SWPPP) and submit the plan for review and approval by the Regional Water Quality Control Board (RWQCB). At a minimum, the SWPPP should include a description of construction materials, practices, and equipment storage and maintenance; a list of pollutants likely to contact stormwater; site-specific erosion and sedimentation control practices; a list of provisions to eliminate or reduce discharge of materials to stormwater; best management practices (BMPs); and an inspection and monitoring program.
- Submit to the RWQCB a copy of the SWPPP and evidence of submittal of the NOI to the SWRCB. Implementation of the SWPPP should start with the commencement of construction and continue through the completion of the project.
- After construction is completed, the project sponsor can and should submit a notice of termination to the SWRCB.
- Consistent with the requirements of the SWRCB and local regulatory agencies with oversight of development associated with the Plan, ensure that project designs provide adequate slope drainage and appropriate landscaping to minimize the occurrence of slope instability and erosion. Design features should include measures to reduce erosion caused by storm water. Road cuts should be designed to maximize the potential for revegetation. • Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that, prior to preparing project designs, new and abandoned wells are identified within construction areas to ensure the stability of nearby soils.

2A.8 cont.

- MM-GHG-3(b):
  - Measures in an adopted plan or mitigation program for the reduction of emissions that are required as part of the Lead Agency's decision.

- Reduction in emissions resulting from a project through implementation of project features, project design, or other measures, such as those described in Appendix F of the State CEQA Guidelines.
- Off-site measures to mitigate a project's emissions.
- Measures that consider incorporation of Best Available Control Technology (BACT) during design, construction and operation of projects to minimize GHG emissions, including but not limited to:
- Use energy and fuel efficient vehicles and equipment. Project proponents are encouraged to meet and exceed all EPA/NHTSA/CARB standards relating to fuel efficiency and emission reduction;
- Use alternative (non-petroleum based) fuels;
- Deployment of zero- and/or near zero emission technologies as defined by CARB;
- Use lighting systems that are energy efficient, such as LED technology;
- Use the minimum feasible amount of GHG-emitting construction materials that is feasible;
- Use cement blended with the maximum feasible amount of fly ash or other materials that reduce GHG emissions from cement production;
- Incorporate design measures to reduce GHG emissions from solid waste management through encouraging solid waste reduction, recycling, and reuse;
- Incorporate passive solar and other design measures to reduce energy consumption and increase production and use of renewable energy;
- Incorporate design measures like WaterSense fixtures and water capture to reduce water consumption;
- Use lighter-colored pavement where feasible;

2A.8 cont.

- Recycle construction debris to maximum extent feasible;
- Protect and plant shade trees in or near construction projects where feasible; and
- Solicit bids that include concepts listed above.
- Measures that encourage transit use, carpooling, bike-share and car-share programs, active transportation, and parking strategies, including, but not limited to, transit-active transportation coordinated strategies, increased bicycle carrying capacity on transit and rail vehicles.
- Incorporating bicycle and pedestrian facilities into project designs, maintaining these facilities, and providing amenities incentivizing their use; providing adequate bicycle parking and planning for and building local bicycle projects that connect with the regional network.
- Improving transit access to rail and bus routes by incentives for construction of transit facilities within developments, and/or providing dedicated shuttle service to transit stations.
- Adopting employer trip reduction measures to reduce employee trips such as vanpool and carpool programs, providing end-of-trip facilities, and telecommuting programs.
- Designate a percentage of parking spaces for ride-sharing vehicles or high-occupancy vehicles, and provide adequate passenger loading and unloading for those vehicles.
- Land use siting and design measures that reduce GHG emissions, including:
- Developing on infill and brownfields sites;
- Building high density and mixed use developments near transit;
- Retaining on-site mature trees and vegetation, and planting new canopy trees;
- Measures that increase vehicle efficiency, encourage use of zero and low emissions vehicles, or reduce the carbon content of fuels,

2A.8 cont.

including constructing or encouraging construction of electric vehicle charging stations or neighborhood electric vehicle networks, or charging for electric bicycles; and

- Measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse.

- MM-HAZ-1(b):
  - Where the construction or operation of projects involves the transport of hazardous material, provide a written plan of proposed routes of travel demonstrating use of roadways designated for the transport of such materials.
  - Where the construction or operation of projects involves the transport of hazardous materials, avoid transport of such materials within one-quarter mile of schools, when school is in session, wherever feasible.
  - Where it is not feasible to avoid transport of hazardous materials, within one-quarter mile of schools on local streets, provide notification of the anticipated schedule of transport of such materials.
  - Specify the need for interim storage and disposal of hazardous materials to be undertaken consistent with applicable federal, state, and local statutes and regulations in the plans and specifications of the transportation improvement project.
  - Submit a Hazardous Materials Business/Operations Plan for review and approval by the appropriate local agency. Once approved, keep the plan on file with the Lead Agency (or other appropriate government agency) and update, as applicable. The purpose of the Hazardous Materials Business/Operations Plan is to ensure that employees are adequately trained to handle the materials and provides information to the local fire protection agency should emergency response be required. The Hazardous Materials Business/Operations Plan should include the following:

2A.8 cont.

- The types of hazardous materials or chemicals stored and/or used on-site, such as petroleum fuel products, lubricants, solvents, and cleaning fluids.
- The location of such hazardous materials.
- An emergency response plan including employee training information.
- A plan that describes the manner in which these materials are handled, transported and disposed. 2A.8 cont.
- Specify the appropriate procedures for interim storage and disposal of hazardous materials, anticipated to be required in support of operations and maintenance activities, in conformance with applicable federal, state, and local statutes and regulations, in the Operations Manual for projects.
- Follow manufacturer's recommendations on use, storage, and disposal of chemical products used in construction.
- Avoid overtopping construction equipment fuel gas tanks.
- During routine maintenance of construction equipment, properly contain and remove grease and oils.
- Properly dispose of discarded containers of fuels and other chemicals.

o MM-HAZ-4(b):

- Complete a Phase I Environmental Site Assessment, including a review and consideration of data from all known databases of contaminated sites, during the process of planning, environmental clearance, and construction for projects.
- Where warranted due to the known presence of contaminated materials, submit to the appropriate agency responsible for hazardous materials/wastes oversight a Phase II Environmental Site Assessment report if warranted by a Phase I report for the project site. The reports should make recommendations for remedial action, if appropriate, and be signed by a Registered

Environmental Assessor, Professional Geologist, or Professional Engineer.

- Implement the recommendations provided in the Phase II Environmental Site Assessment report, where such a report was determined to be necessary for the construction or operation of the project, for remedial action.
- Submit a copy of all applicable documentation required by local, state, and federal environmental regulatory agencies, including but not limited to: permit applications, Phase I and II Environmental Site Assessments, human health and ecological risk assessments, remedial action plans, risk management plans, soil management plans, and groundwater management plans.
- Conduct soil sampling and chemical analyses of samples, consistent with the protocols established by the U.S. EPA to determine the extent of potential contamination beneath all underground storage tanks (USTs), elevator shafts, clarifiers, and subsurface hydraulic lifts when on-site demolition or construction activities would potentially affect a particular development or building.
- Consult with the appropriate local, state, and federal environmental regulatory agencies to ensure sufficient minimization of risk to human health and environmental resources, both during and after construction, posed by soil contamination, groundwater contamination, or other surface hazards including, but not limited to, underground storage tanks, fuel distribution lines, waste pits and sumps.
- Obtain and submit written evidence of approval for any remedial action if required by a local, state, or federal environmental regulatory agency.
- Cease work if soil, groundwater, or other environmental medium with suspected contamination is encountered unexpectedly during construction activities (e.g., identified by odor or visual staining, or if any underground storage tanks, abandoned drums, or other

2A.8 cont.

hazardous materials or wastes are encountered), in the vicinity of the suspect material. Secure the area as necessary and take all appropriate measures to protect human health and the environment, including but not limited to: notification of regulatory agencies and identification of the nature and extent of contamination. Stop work in the areas affected until the measures have been implemented consistent with the guidance of the appropriate regulatory oversight authority.

2A.8 cont.

- Use best management practices (BMPs) regarding potential soil and groundwater hazards.
- Soil generated by construction activities should be stockpiled on-site in a secure and safe manner. All contaminated soils determined to be hazardous or non-hazardous waste must be adequately profiled (sampled) prior to acceptable reuse or disposal at an appropriate off-site facility. Complete sampling and handling and transport procedures for reuse or disposal, in accordance with applicable local, state and federal laws and policies.
- Groundwater pumped from the subsurface should be contained on-site in a secure and safe manner, prior to treatment and disposal, to ensure environmental and health issues are resolved pursuant to applicable laws and policies. Utilize engineering controls, which include impermeable barriers to prohibit groundwater and vapor intrusion into the building.
- Prior to issuance of any demolition, grading, or building permit, submit for review and approval by the Lead Agency (or other appropriate government agency) written verification that the appropriate federal, state and/or local oversight authorities, including but not limited to the Regional Water Quality Control Board (RWQCB), have granted all required clearances and confirmed that the all applicable standards, regulations, and conditions have been met for previous contamination at the site.
- Develop, train, and implement appropriate worker awareness and protective measures to assure that worker and public exposure is

minimized to an acceptable level and to prevent any further environmental contamination as a result of construction.

- If asbestos-containing materials (ACM) are found to be present in building materials to be removed, submit specifications signed by a certified asbestos consultant for the removal, encapsulation, or enclosure of the identified ACM in accordance with all applicable laws and regulations, including but not necessarily limited to: California Code of Regulations, Title 8; Business and Professions Code; Division 3; California Health and Safety Code Section 25915- 25919.7; and other local regulations. 2A.8 cont.
- Where projects include the demolitions or modification of buildings constructed prior to 1968, complete an assessment for the potential presence or lack thereof of ACM, lead-based paint, and any other building materials or stored materials classified as hazardous waste by state or federal law.
- Where the remediation of lead-based paint has been determined to be required, provide specifications to the appropriate agency, signed by a certified Lead Supervisor, Project Monitor, or Project Designer for the stabilization and/or removal of the identified lead paint in accordance with all applicable laws and regulations, including but not necessarily limited to: California Occupational Safety and Health Administration's (Cal OSHA's) Construction Lead Standard, Title 8 California Code of Regulations (CCR) Section 1532.1 and Department of Health Services (DHS) Regulation 17 CCR Sections 35001–36100, as may be amended. If other materials classified as hazardous waste by state or federal law are present, the project sponsor should submit written confirmation to the appropriate local agency that all state and federal laws and regulations should be followed when profiling, handling, treating, transporting, and/or disposing of such materials.
- Where a project site is determined to contain materials classified as hazardous waste by state or federal law are present, submit written confirmation to appropriate agency that all state and federal laws

and regulations should be followed when profiling, handling, treating, transporting, and/or disposing of such materials.

- MM-HAZ-8(b):
  - Adhere to fire code requirements, including ignition-resistant construction with exterior walls of noncombustible or ignition resistant material from the surface of the ground to the roof system. Other fire-resistant measures would be applied to eaves, vents, windows, and doors to avoid any gaps that would allow intrusion by flame or embers.
  - Adhere to the Multi-Jurisdictional Hazards Mitigation Plan, as well as local general plans, including policies and programs aimed at reducing the risk of wildland fires through land use compatibility, training, sustainable development, brush management, and public outreach.
  - Encourage the use of fire-resistant vegetation native to Southern California and/or to the local microclimate (e.g., vegetation that has high moisture content, low growth habits, ignition-resistant foliage, or evergreen growth), eliminate brush and chaparral, and discourage the use of fire-promoting species especially non-native, invasive species (e.g., pampas grass, fennel, mustard, or the giant reed) in the immediate vicinity of development in areas with high fire threat.
  - Encourage natural revegetation or seeding with local, native species after a fire and discourage reseeding of non-native, invasive species to promote healthy, natural ecosystem regrowth. Native vegetation is more likely to have deep root systems that prevent slope failure and erosion of burned areas than shallow-rooted non-natives.
  - Submit a fire safety plan (including phasing) to the Lead Agency and local fire agency for their review and approval. The fire safety plan shall include all of the fire safety features incorporated into the project and the schedule for implementation of the features. The local fire protection agency may require changes to the plan or

2A.8 cont.

may reject the plan if it does not adequately address fire hazards associated with the project as a whole or the individual phase.

- Utilize Fire-wise Land Management by encouraging the use of fire-resistant vegetation and the elimination of brush and chaparral in the immediate vicinity of development in areas with high fire threat.
- Promote Fire Management Planning that would help reduce fire threats in the region as part of the Compass Blueprint process and other ongoing regional planning efforts.
- Encourage the use of fire-resistant materials when constructing projects in areas with high fire threat.

2A.8 cont.

- MM-HYD-1(b):
  - Complete, and have approved, a Stormwater Pollution Prevention Plan (SWPPP) prior to initiation of construction.
  - Implement Best Management Practices to reduce the peak stormwater runoff from the project site to the maximum extent practicable.
  - Comply with the Caltrans storm water discharge permit as applicable; and identify and implement Best Management Practices to manage site erosion, wash water runoff, and spill control.
  - Complete, and have approved, a Standard Urban Stormwater Management Plan, prior to occupancy of residential or commercial structures.
  - Ensure adequate capacity of the surrounding stormwater system to support stormwater runoff from new or rehabilitated structures or buildings.
  - Prior to construction within an area subject to Section 404 of the Clean Water Act, obtain all required permit approvals and certifications for construction within the vicinity of a watercourse:
  - U.S. Army Corps of Engineers (Corps): Section 404. Permit approval from the Corps should be obtained for the placement of

dredge or fill material in Waters of the U.S., if any, within the interior of the project site, pursuant to Section 404 of the federal Clean Water Act.

- Regional Walter Quality Control Board (RWQCB): Section 401 Water Quality Certification. Certification that the project will not violate state water quality standards is required before the Corps can issue a 404 permit, above.

2A.8 cont.

- California Department of Fish and Wildlife (CDFW): Section 1602 Lake and Streambed Alteration Agreement. Work that will alter the bed or bank of a stream requires authorization from CDFW.
- Where feasible, restore or expand riparian areas such that there is no net loss of impervious surface as a result of the project.
- Install structural water quality control features, such as drainage channels, detention basins, oil and grease traps, filter systems, and vegetated buffers to prevent pollution of adjacent water resources by polluted runoff where required by applicable urban storm water runoff discharge permits, on new facilities.
- Provide structural storm water runoff treatment consistent with the applicable urban storm water runoff permit. Where Caltrans is the operator, the statewide permit applies.
- Provide operational best management practices for street cleaning, litter control, and catch basin cleaning are implemented to prevent water quality degradation in compliance with applicable storm water runoff discharge permits; and ensure treatment controls are in place as early as possible, such as during the acquisition process for rights-of-way, not just later during the facilities design and construction phase.
- Comply with applicable municipal separate storm sewer system discharge permits as well as Caltrans' storm water discharge permit including long-term sediment control and drainage of roadway runoff.

- Incorporate as appropriate treatment and control features such as detention basins, infiltration strips, and porous paving, other features to control surface runoff and facilitate groundwater recharge into the design of new transportation projects early on in the process to ensure that adequate acreage and elevation contours are provided during the right-of-way acquisition process.

2A.8 cont.

- Design projects to maintain volume of runoff, where any downstream receiving water body has not been designed and maintained to accommodate the increase in flow velocity, rate, and volume without impacting the water's beneficial uses. Pre-project flow velocities, rates, and volumes must not be exceeded. This applies not only to increases in storm water runoff from the project site, but also to hydrologic changes induced by flood plain encroachment. Projects should not cause or contribute to conditions that degrade the physical integrity or ecological function of any downstream receiving waters.
- Provide culverts and facilities that do not increase the flow velocity, rate, or volume and/or acquiring sufficient storm drain easements that accommodate an appropriately vegetated earthen drainage channel.
- Upgrade stormwater drainage facilities to accommodate any increased runoff volumes. These upgrades may include the construction of detention basins or structures that will delay peak flows and reduce flow velocities, including expansion and restoration of wetlands and riparian buffer areas. System designs shall be completed to eliminate increases in peak flow rates from current levels.
- Encourage Low Impact Development (LID) and incorporation of natural spaces that reduce, treat, infiltrate and manage stormwater runoff flows in all new developments, where practical and feasible.
- If a proposed project has the potential to create a major new stormwater discharge to a water body with an established Total Maximum Daily Load (TMDL), a quantitative analysis of the

anticipated pollutant loads in the stormwater discharges to the receiving waters should be carried out.

- MM-HYD-2(b):
  - For projects requiring continual dewatering facilities, implement monitoring systems and long-term administrative procedures to ensure proper water management that prevents degrading of surface water and minimizes, to the greatest extent possible, adverse impacts on groundwater for the life of the project, Construction designs shall comply with appropriate building codes and standard practices including the Uniform Building Code.
  - Maximize, where practical and feasible, permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. Minimize to the greatest extent possible, new impervious surfaces, including the use of in-lieu fees and off-site mitigation.
  - Avoid designs that require continual dewatering where feasible.
  - Avoid construction and siting on groundwater recharge areas, to prevent conversion of those areas to impervious surface.
  - Reduce hardscape to the extent feasible to facilitate groundwater recharge as appropriate.
- MM-HYD-8(b):
  - Comply with Executive Order 11988 on Floodplain Management, which requires avoidance of incompatible floodplain development, restoration and preservation of the natural and beneficial floodplain values, and maintenance of consistency with the standards and criteria of the National Flood Insurance Program.
  - Ensure that all roadbeds for new highway and rail facilities be elevated at least one foot above the 100-year base flood elevation. Since alluvial fan flooding is not often identified on FEMA flood maps, the risk of alluvial fan flooding should be evaluated and projects should be sited to avoid alluvial fan flooding. Delineation of floodplains and alluvial fan boundaries should attempt to

2A.8 cont.

account for future hydrologic changes caused by global climate change.

- MM-LU-1(b):
  - Where an inconsistency with the adopted general plan is identified at the proposed project location, determine if the environmental, social, economic, and engineering benefits of the project warrant a variance from adopted zoning or an amendment to the general plan.
- MM-LU-2(b):
  - Consider alignments within or adjacent to existing public rights-of-way.
  - Consider designs to include sections above- or below-grade to maintain viable vehicular, cycling, and pedestrian connections between portions of communities where existing connections are disrupted by the transportation project.
  - Wherever feasible incorporate direct crossings, overcrossings, or undercrossings at regular intervals for multiple modes of travel (e.g., pedestrians, bicyclists, vehicles).
  - Consider realigning roadway or interchange improvements to avoid the affected area of residential communities or cohesive neighborhoods.
  - Where it has been determined that it is infeasible to avoid creating a barrier in an established community, consider other measures to reduce impacts, including but not limited to:
  - Alignment shifts to minimize the area affected.
  - Reduction of the proposed right-of-way take to minimize the overall area of impact.
  - Provisions for bicycle, pedestrian, and vehicle access across improved roadways.
  - Design new transportation facilities that consider access to existing community facilities. Identify and consider during the design phase

2A.8 cont.

of the project, community amenities and facilities in the design of the project.

- Design roadway improvements that minimize barriers to pedestrians and bicyclists. Determine during the design phase, pedestrian and bicycle routes that permit connections to nearby community facilities.

- MM-MIN-1(b): 2A.8 cont.
  - Provide for the efficient use of known aggregate and mineral resources or locally important mineral resource recovery sites, by ensuring that the consumptive use of aggregate resources is minimized and that access to recoverable sources of aggregate is not precluded, as a result of construction, operation and maintenance of projects.
  - Where avoidance is infeasible, minimize impacts to the efficient and effective use of recoverable sources of aggregate through measures that have been identified in county and city general plans, or other comparable measures:
  - Recycle and reuse building materials resulting from demolition, particularly aggregate resources, to the maximum extent practicable.
  - Identify and use building materials, particularly aggregate materials, resulting from demolition at other construction sites in the SCAG region, or within a reasonable hauling distance of the project site.
  - Design transportation network improvements in a manner (such as buffer zones or the use of screening) that does not preclude adjacent or nearby extraction of known mineral and aggregate resources following completion of the improvement and during long-term operations.
  - Avoid or reduce impacts on known aggregate and mineral resources and mineral resource recovery sites through the evaluation and selection of project sites and design features (e.g., buffers) that minimize impacts on land suitable for aggregate and

mineral resource extraction by maintaining portions of MRZ-2 areas in open space or other general plan land use categories and zoning that allow for mining of mineral resources.

- MM-NOISE-1(b):
  - Install temporary noise barriers during construction.
  - Include permanent noise barriers and sound-attenuating features as part of the project design.
  - Schedule construction activities consistent with the allowable hours pursuant to applicable general plan noise element or noise ordinance Where construction activities are authorized outside the limits established by the noise element of the general plan or noise ordinance, notify affected sensitive noise receptors and all parties who will experience noise levels in excess of the allowable limits for the specified land use, of the level of exceedance and duration of exceedance; and provide a list of protective measures that can be undertaken by the individual, including temporary relocation or use of hearing protective devices.
  - Limit speed and/or hours of operation of rail and transit systems during the selected periods of time to reduce duration and frequency of conflict with adopted limits on noise levels.
  - Post procedures and phone numbers at the construction site for notifying the Lead Agency staff, local Police Department, and construction contractor (during regular construction hours and off-hours), along with permitted construction days and hours, complaint procedures, and who to notify in the event of a problem.
  - Notify neighbors and occupants within 300 feet of the project construction area at least 30 days in advance of anticipated times when noise levels are expected to exceed limits established in the noise element of the general plan or noise ordinance.
  - Hold a preconstruction meeting with the job inspectors and the general contractor/on-site project manager to confirm that noise

2A.8 cont.

measures and practices (including construction hours, neighborhood notification, posted signs, etc.) are completed.

- Designate an on-site construction complaint and enforcement manager for the project.
- Ensure that construction equipment are properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., mufflers, silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded.
- Ensure that impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for project construction are hydraulically or electrically powered to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust can and should be used. External jackets on the tools themselves can and should be used, if such jackets are commercially available and this could achieve a reduction of 5 dBA. Quieter procedures can and should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures.
- Ensure that construction equipment are not idle for an extended time in the vicinity of noise-sensitive receptors.
- Locate fixed/stationary equipment (such as generators, compressors, rock crushers, and cement mixers) as far as possible from noise-sensitive receptors.
- Locate new roadway lanes, roadways, rail lines, transit-related passenger station and related facilities, park-and-ride lots, and other new noise-generating facilities away from sensitive receptors to the maximum extent feasible.
- Where feasible, eliminate noise-sensitive receptors by acquiring freeway and rail rights-of-way.

2A.8 cont.

- Use noise barriers to protect sensitive receptors from excessive noise levels during construction.
- Construct sound-reducing barriers between noise sources and noise-sensitive receptors to minimize exposure to excessive noise during operation of transportation improvement projects, including but not limited to earth-berms or sound walls.
- Where feasible, design projects so that they are depressed below the grade of the existing noise-sensitive receptor, creating an effective barrier between the roadway and sensitive receptors.
- Where feasible, improve the acoustical insulation of dwelling units where setbacks and sound barriers do not provide sufficient noise reduction.
- Monitor the effectiveness of noise reduction measures by taking noise measurements and installing adaptive mitigation measures to achieve the standards for ambient noise levels established by the noise element of the general plan or noise ordinance.

2A.8 cont.

- MM-NOISE-2(b):
  - For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the potential vibration impacts to the structural integrity of the adjacent buildings within 50 feet of pile driving locations.
  - For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the threshold levels of vibration and cracking that could damage adjacent historic or other structure, and design means and construction methods to not exceed the thresholds.
  - For projects where pile driving would be necessary for construction due to geological conditions, utilize quiet pile driving techniques such as predrilling the piles to the maximum feasible depth, where feasible. Predrilling pile holes will reduce the number of blows required to completely seat the pile and will

concentrate the pile driving activity closer to the ground where pile driving noise can be shielded more effectively by a noise barrier/curtain.

- For projects where pile driving would be necessary for construction due to geological conditions, utilize quiet pile driving techniques such as the use of more than one pile driver to shorten the total pile driving duration.

2A.8 cont.

- MM-PHE-2(b):
  - Evaluate alternate route alignments and transportation facilities that minimize the displacement of homes and businesses. Use an iterative design and impact analysis where impacts to homes or businesses are involved to minimize the potential of impacts on housing and displacement of people.
  - Prioritize the use existing ROWs, wherever feasible.
  - Develop a construction schedule that minimizes potential neighborhood deterioration from protracted waiting periods between right-of-way acquisition and construction.
- MM-PS-1(b):
  - Where the project has the potential to generate the need for expanded emergency response services which exceed the capacity of existing facilities, provide for the construction of new facilities directly as an element of the project or through dedicated fair share contributions toward infrastructure improvements.
- MM-PS-2(b):
  - Coordinate with public security agencies to ensure that there are adequate governmental facilities to maintain acceptable service ratios, response times, or other performance objectives for public protective security services and that any required additional construction of buildings is incorporated into the project description.

- Where current levels of services at the project site are found to be inadequate, provide fair share contributions towards infrastructure improvements and/or personnel.

- MM-PS-3(b):
  - Where construction or expansion of school facilities is required to meet public school service ratios, require school district fees, as applicable.

2A.8 cont.

- MM-REC-1(b):
  - Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, consider increasing the accessibility to natural areas and lands for outdoor recreation from the proposed project area, in coordination with local and regional open space planning and/or responsible management agencies.
  - Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, encourage patterns of urban development and land use which reduce costs on infrastructure and make better use of existing facilities, using strategies such as:
  - Increasing the accessibility to natural areas for outdoor recreation.
  - Promoting infill development and redevelopment to revitalize existing communities.
  - Utilizing "green" development techniques.
  - Promoting water-efficient land use and development.
  - Encouraging multiple uses.
  - Including trail systems and trail segments in General Plan recreation standards.
  - Prior to the issuance of permits, where construction and operation of projects would require the acquisition or development of protected open space or recreation lands, demonstrate that existing neighborhood parks can be expanded or

new neighborhood parks developed such that there is no net decrease in acres of neighborhood park area available per capita in the HQTA.

- MM-TRA-1(b):
  - Institute teleconferencing, telecommute and/or flexible work hour programs to reduce unnecessary employee transportation.
  - Create a ride-sharing program by designating a certain percentage of parking spaces for ride sharing vehicles, designating adequate passenger loading and unloading for ride sharing vehicles, and providing a web site or message board for coordinating rides.
  - Provide a vanpool for employees.
  - Fund capital improvement projects to accommodate future traffic demand in the area.
  - Provide a Transportation Demand Management (TDM) plan containing strategies to reduce on-site parking demand and single occupancy vehicle travel. The TDM shall include strategies to increase bicycle, pedestrian, transit, and carpools/vanpool use, including:
  - Inclusion of additional bicycle parking, shower, and locker facilities that exceed the requirement
  - Construction of bike lanes per the prevailing Bicycle Master Plan (or other similar document)
  - Signage and striping onsite to encourage bike safety
  - Installation of pedestrian safety elements (such as cross walk striping, curb ramps, countdown signals, bulb outs, etc.) to encourage convenient crossing at arterials
  - Installation of amenities such as lighting, street trees, trash and any applicable streetscape plan.
  - Direct transit sales or subsidized transit passes
  - Guaranteed ride home program

2A.8 cont.

- Pre-tax commuter benefits (checks)
- On-site car-sharing program (such as City Car Share, Zip Car, etc.)
- On-site carpooling program
- Distribution of information concerning alternative transportation options

2A.8 cont.

- Parking spaces sold/leased separately
- Parking management strategies; including attendant/valet parking and shared parking spaces.
- Promote ride sharing programs e.g., by designating a certain percentage of parking spaces for high-occupancy vehicles, providing larger parking spaces to accommodate vans used for ride-sharing, and designating adequate passenger loading and unloading and waiting areas.
- Encourage bicycling to transit facilities by providing additional bicycle parking, locker facilities, and bike lane access to transit facilities when feasible.
- Encourage the use of public transit systems by enhancing safety and cleanliness on vehicles and in and around stations, providing shuttle service to public transit, offering public transit incentives and providing public education and publicity about public transportation services.
- Encourage bicycling and walking by incorporating bicycle lanes into street systems in regional transportation plans, new subdivisions, and large developments, creating bicycle lanes and walking paths directed to the location of schools and other logical points of destination and provide adequate bicycle parking, and encouraging commercial projects to include facilities on-site to encourage employees to bicycle or walk to work.
- Build or fund a major transit stop within or near transit development upon consultation with applicable CTCs.

- Work with the school districts to improve pedestrian and bike access to schools and to restore or expand school bus service using lower-emitting vehicles.
- Provide information on alternative transportation options for consumers, residents, tenants and employees to reduce transportation-related emissions
- Adopt a comprehensive parking policy to discourage private vehicle use and encourage the use of alternative transportation by incorporating the following:
- Reduce the available parking spaces for private vehicles while increasing parking spaces for shared vehicles, bicycles, and other alternative modes of transportation;
- "Unbundle" parking (require that parking is paid for separately and is not included in the base rent for residential and commercial space);
- Use parking pricing to discourage private car use, especially at peak times.
- Educate consumers, residents, tenants and the public about options for reducing motor vehicle-related greenhouse gas emissions. Include information on trip reduction; trip linking; vehicle performance and efficiency (e.g., keeping tires inflated); and low or zero-emission vehicles.
- Purchase, or create incentives for purchasing, low or zero-emission vehicles.
- Create local "light vehicle" networks, such as neighborhood electric vehicle systems.
- Enforce and follow limits idling time for commercial vehicles, including delivery and construction vehicles.
- Provide the necessary facilities and infrastructure to encourage the use of low or zero-emission vehicles.

2A.8 cont.

- Reduce VMT-related emissions by encouraging the use of public transit through adoption of new development standards that would require improvements to the transit system and infrastructure, increase safety and accessibility, and provide other incentives.
- Project Selection:
- Give priority to transportation projects that would contribute to a reduction in vehicle miles traveled per capita, while maintaining economic vitality and sustainability.
- Separate sidewalks whenever possible, on both sides of all new street improvement projects, except where there are severe topographic or natural resource constraints.
- Public Involvement:
- Carry out a comprehensive public involvement and input process that provides information about transportation issues, projects, and processes to community members and other stakeholders, especially to those traditionally underserved by transportation services.
- Transit and Multimodal Impact Fees:
- Assess transit and multimodal impact fees for new developments to fund public transportation infrastructure, bicycle infrastructure, pedestrian infrastructure and other multimodal accommodations.
- Implement traffic and roadway management strategies to improve mobility and efficiency, and reduce associated emissions.
- System Monitoring:
- Monitor traffic and congestion to determine when and where new transportation facilities are needed in order to increase access and efficiency.
- Arterial Traffic Management:

2A.8 cont.

- Modify arterial roadways to allow more efficient bus operation, including bus lanes and signal priority/preemption where necessary.
- Signal Synchronization:
- Expand signal timing programs where emissions reduction benefits can be demonstrated, including maintenance of the synchronization system, and will coordinate with adjoining jurisdictions as needed to optimize transit operation while maintaining a free flow of traffic.
- HOV Lanes:
- Encourage the construction of high-occupancy vehicle (HOV) lanes or similar mechanisms whenever necessary to relieve congestion and reduce emissions.
- Delivery Schedules:
- Establish ordinances or land use permit conditions limiting the hours when deliveries can be made to off-peak hours in high traffic areas.
- Implement and supporting trip reduction programs.
- Support bicycle use as a mode of transportation by enhancing infrastructure to accommodate bicycles and riders, and providing incentives.
- Establish standards for new development and redevelopment projects to support bicycle use, including amending the Development Code to include standards for safe pedestrian and bicyclist accommodations, and require new development and redevelopment projects to include bicycle facilities.
- Bicycle and Pedestrian Trails:
- Establish a network of multi-use trails to facilitate safe and direct off-street bicycle and pedestrian travel, and will provide bike racks along these trails at secure, lighted locations.
- Bicycle Safety Program:

2A.8 cont.

- Develop and implement a bicycle safety educational program to teach drivers and riders the laws, riding protocols, routes, safety tips, and emergency maneuvers.
- Bicycle and Pedestrian Project Funding: Pursue and provide enhanced funding for bicycle and pedestrian facilities and access projects.

2A.8 cont.

- Bicycle Parking:
- Adopt bicycle parking standards that ensure bicycle parking sufficient to accommodate 5 to 10 percent of projected use at all public and commercial facilities, and at a rate of at least one per residential unit in multiple-family developments (suggestion: check language with League of American Bicyclists).
- Adopt a comprehensive parking policy to discourage private vehicle use and encourage the use of alternative transportation by incorporating the following:
- Reduce the available parking spaces for private vehicles while increasing parking spaces for shared vehicles, bicycles, and other alternative modes of transportation;
- Eliminate or reduce minimum parking requirements for new buildings;
- "Unbundle" parking (require that parking is paid for separately and is not included in the base rent for residential and commercial space);
- Use parking pricing to discourage private vehicle use, especially at peak times;
- Create parking benefit districts, which invest meter revenues in pedestrian infrastructure and other public amenities;
- Establish performance pricing of street parking, so that it is expensive enough to promote frequent turnover and keep 15 percent of spaces empty at all times;

- Encourage shared parking programs in mixed-use and transit-oriented development areas.
- Establish policies and programs to reduce onsite parking demand and promote ride-sharing and public transit at large events, including:
- Promote the use of peripheral parking by increasing on-site parking rates and offering reduced rates for peripheral parking;
- Encourage special event center operators to advertise and offer discounted transit passes with event tickets;
- Encourage special event center operators to advertise and offer discount parking incentives to carpooling patrons, with four or more persons per vehicle for on-site parking;
- Promote the use of bicycles by providing space for the operation of valet bicycle parking service.
- Parking "Cash-out" Program:
- Require new office developments with more than 50 employees to offer a Parking "Cash-out" Program to discourage private vehicle use.
- Pedestrian and Bicycle Promotion:
- Work with local community groups and downtown business associations to organize and publicize walking tours and bicycle events, and to encourage pedestrian and bicycle modes of transportation.
- Fleet Replacement:
- Establish a replacement policy and schedule to replace fleet vehicles and equipment with the most fuel efficient vehicles practical, including gasoline hybrid and alternative fuel or electric models.

2A.8 cont.

- MM-TRA-2(b):

- Encourage a comprehensive parking policy that prioritizes system management, increase rideshare, and telecommute opportunities, including investment in non-motorized transportation and discouragement against private vehicle use, and encouragement to maximize the use of alternative transportation:
- Advocate for a regional, market-based system to price or charge for auto trips during peak hours.
- Ensure that new developments incorporate both local and regional transit measures into the project design that promote the use of alternative modes of transportation.

2A.8 cont.

- Coordinate controlled intersections so that traffic passes more efficiently through congested areas. Where traffic signals or streetlights are installed, require the use of Light Emitting Diode (LED) technology or similar technology.
- Encourage the use of car-sharing programs. Accommodations for such programs include providing parking spaces for the car-share vehicles at convenient locations accessible by public transportation.
- Reduce VHDs, especially daily heavy-duty truck vehicle hours of delay, through goods movement capacity enhancements, system management, increasing rideshare and work-at-home opportunities to reduce demand on the transportation system, investments in non-motorized transportation, maximizing the benefits of the land use-transportation connection and key transportation investments targeted to reduce heavy-duty truck delay.
- Determine traffic management strategies to reduce, to the maximum extent feasible, traffic congestion and the effects of parking demand by construction workers during construction of this project and other nearby projects that could be simultaneously under construction. Develop a construction management plan that include the following items and

requirements, if determined feasible and applicable by the Lead Agency:

- A set of comprehensive traffic control measures, including scheduling of major truck trips and deliveries to avoid peak traffic hours, detour signs if required, lane closure procedures, signs, cones for drivers, and designated construction access routes.
- Notification procedures for adjacent property owners and public safety personnel regarding when major deliveries, detours, and lane closures will occur.
- Location of construction staging areas for materials, equipment, and vehicles at an approved location.
- A process for responding to, and tracking, complaints pertaining to construction activity, including identification of an onsite complaint manager. The manager shall determine the cause of the complaints and shall take prompt action to correct the problem. The Lead Agency shall be informed who the Manager is prior to the issuance of the first permit.
- Provision for accommodation of pedestrian flow.
- As necessary, provision for parking management and spaces for all construction workers to ensure that construction workers do not park in on street spaces.
- Any damage to the street caused by heavy equipment, or as a result of this construction, shall be repaired, at the project sponsor's expense., within one week of the occurrence of the damage (or excessive wear), unless further damage/excessive wear may continue; in such case, repair shall occur prior to issuance of a final inspection of the building permit. All damage that is a threat to public health or safety shall be repaired immediately. The street shall be restored to its condition prior to the new construction as established by the Lead Agency (or other appropriate government agency) and/or photo documentation, at

2A.8 cont.

the sponsor's expense, before the issuance of a Certificate of Occupancy.

- Any heavy equipment brought to the construction site shall be transported by truck, where feasible.
- No materials or equipment shall be stored on the traveled roadway at any time.
- Prior to construction, a portable toilet facility and a debris box shall be installed on the site, and properly maintained through project completion.
- All equipment shall be equipped with mufflers.
- Prior to the end of each work-day during construction, the contractor or contractors shall pick up and properly dispose of all litter resulting from or related to the project, whether located on the property, within the public rights-of-way, or properties of adjacent or nearby neighbors.
- Promote "least polluting" ways to connect people and goods to their destinations.
- Create an interconnected transportation system that allows a shift in travel from private passenger vehicles to alternative modes, including public transit, ride sharing, car sharing, bicycling and walking, by incorporating the following, if determined feasible and applicable by the Lead Agency:
- Ensure transportation centers are multi-modal to allow transportation modes to intersect.
- Provide adequate and affordable public transportation choices, including expanded bus routes and service, as well as other transit choices such as shuttles, light rail, and rail.
- To the extent feasible, extend service and hours of operation to underserved arterials and population centers or destinations such as colleges.

2A.8 cont.

- Focus transit resources on high-volume corridors and high-boarding destinations such as colleges, employment centers and regional destinations.
- Coordinate schedules and routes across service lines with neighboring transit authorities.
- Support programs to provide "station cars" for short trips to and from transit nodes (e.g., neighborhood electric vehicles).
- Study the feasibility of providing free transit to areas with residential densities of 15 dwelling units per acre or more, including options such as removing service from less dense, underutilized areas to do so.

2A.8 cont.

- Employ transit-preferential measures, such as signal priority and bypass lanes. Where compatible with adjacent land use designations, right-of-way acquisition or parking removal may occur to accommodate transit-preferential measures or improve access to transit. The use of access management shall be considered where needed to reduce conflicts between transit vehicles and other vehicles.
- Provide safe and convenient access for pedestrians and bicyclists to, across, and along major transit priority streets.
- Use park-and-ride facilities to access transit stations only at ends of regional transit ways or where adequate feeder bus service is not feasible.
- Upgrade and maintain transit system infrastructure to enhance public use, if determined feasible and applicable by the Lead Agency, including:
- Ensure transit stops and bus lanes are safe, convenient, clean and efficient. o Ensure transit stops have clearly marked street-level designation, and are accessible.
- Ensure transit stops are safe, sheltered, benches are clean, and lighting is adequate.

- Place transit stations along transit corridors within mixed-use or transit-oriented development areas at intervals of three to four blocks, or no less than one-half mile.
- Enhance customer service and system ease-of-use, if determined feasible and applicable by the Lead Agency, including:
- Develop a Regional Pass system to reduce the number of different passes and tickets required of system users.
- Implement "Smart Bus" technology, using GPS and electronic displays at transit stops to provide customers with "real-time" arrival and departure time information (and to allow the system operator to respond more quickly and effectively to disruptions in service).
- Investigate the feasibility of an on-line trip-planning program.
- Prioritize transportation funding to support a shift from private passenger vehicles to transit and other modes of transportation, if determined feasible and applicable by the Lead Agency, including:
- Give funding preference to improvements in public transit over other new infrastructure for private automobile traffic.
- Before funding transportation improvements that increase roadway capacity and VMT, evaluate the feasibility and effectiveness of funding projects that support alternative modes of transportation and reduce VMT, including transit, and bicycle and pedestrian access.
- Promote ride sharing programs, if determined feasible and applicable by the Lead Agency, including:
- Designate a certain percentage of parking spaces for ride-sharing vehicles.
- Designate adequate passenger loading, unloading, and waiting areas for ride-sharing vehicles.
- Provide a web site or message board for coordinating shared rides.

2A.8 cont.

- Encourage private, for-profit community car-sharing, including parking spaces for car share vehicles at convenient locations accessible by public transit.
- Hire or designate a rideshare coordinator to develop and implement ridesharing programs.
- Support voluntary, employer-based trip reduction programs, if determined feasible and applicable by the Lead Agency, including:
- Provide assistance to regional and local ridesharing organizations.
- Advocate for legislation to maintain and expand incentives for employer ridesharing programs.
- Require the development of Transportation Management Associations for large employers and commercial/ industrial complexes.
- Provide public recognition of effective programs through awards, top ten lists, and other mechanisms.
- Implement a "guaranteed ride home" program for those who commute by public transit, ride-sharing, or other modes of transportation, and encourage employers to subscribe to or support the program.
- Encourage and utilize shuttles to serve neighborhoods, employment centers and major destinations.
- Create a free or low-cost local area shuttle system that includes a fixed route to popular tourist destinations or shopping and business centers.
- Work with existing shuttle service providers to coordinate their services.
- Facilitate employment opportunities that minimize the need for private vehicle trips, including:
- Amend zoning ordinances and the Development Code to include live/work sites and satellite work centers in appropriate locations.

2A.8 cont.

- Encourage telecommuting options with new and existing employers, through project review and incentives, as appropriate.
- Enforce state idling laws for commercial vehicles, including delivery and construction vehicles.
- Organize events and workshops to promote GHG-reducing activities.
- Implement a Parking Management Program to discourage private vehicle use, including: o Encouraging carpools and vanpools with preferential parking and a reduced parking fee. o Institute a parking cash-out program. o Renegotiate employee contracts, where possible, to eliminate parking subsidies. o Install on-street parking meters with fee structures designed to discourage private vehicle use. o Establish a parking fee for all single-occupant vehicles.

2A.8 cont.

- Work with school districts to improve pedestrian and bicycle to schools and restore school bus service
- Encourage the use of bicycles to transit facilities by providing bicycle parking lockers facilities and bike land access to transit facilities.
- Monitor traffic congestion to determine where and when new transportation facilities are needed to increase access and efficiency.
- Develop and implement a bicycle and pedestrian safety educational program to teach drivers and riders the laws, riding protocols, safety tips, and emergency maneuvers.
- Synchronize traffic signals to reduce congestion and air quality.
- Work with community groups and business associations to organize and publicize walking tours and bicycle evens.
- Support legislative efforts to increase funding for local street repair.

o MM-TRA-5(b):

- Prior to construction, project implementation agencies can and should ensure that all necessary local and state road and railroad encroachment permits are obtained. The project implementation agency can and should also comply with all applicable conditions of approval. As deemed necessary by the governing jurisdiction, the road encroachment permits may require the contractor to prepare a traffic control plan in accordance with professional engineering standards prior to construction. Traffic control plans can and should include the following requirements: o Identification of all roadway locations where special construction techniques (e.g., directional drilling or night construction) would be used to minimize impacts to traffic flow. 2A.8 cont.
- Development of circulation and detour plans to minimize impacts to local street circulation. This may include the use of signing and flagging to guide vehicles through and/or around the construction zone.
- Scheduling of truck trips outside of peak morning and evening commute hours.
- Limiting of lane closures during peak hours to the extent possible.
- Usage of haul routes minimizing truck traffic on local roadways to the extent possible.
- Inclusion of detours for bicycles and pedestrians in all areas potentially affected by project construction.
- Installation of traffic control devices as specified in the California Department of Transportation Manual of Traffic Controls for Construction and Maintenance Work Zones.
- Development and implementation of access plans for highly sensitive land uses such as police and fire stations, transit stations, hospitals, and schools. The access plans would be developed with the facility owner or administrator. To minimize disruption of emergency vehicle access, affected jurisdictions can and should be asked to identify detours for emergency vehicles, which will then

be posted by the contractor. Notify in advance the facility owner or operator of the timing, location, and duration of construction activities and the locations of detours and lane closures.

- Storage of construction materials only in designated areas.
- Coordination with local transit agencies for temporary relocation of routes or bus stops in work zones, as necessary.
- Ensure the rapid repair of transportation infrastructure in the event of an emergency through cooperation among public agencies and by identifying critical infrastructure needs necessary for: a) emergency responders to enter the region, b) evacuation of affected facilities, and c) restoration of utilities.
- Enhance emergency preparedness awareness among public agencies and with the public at large.
- Provision for collaboration in planning, communication, and information sharing before, during, or after a regional emergency through the following:
- Incorporate strategies and actions pertaining to response and prevention of security incidents and events as part of the on-going regional planning activities.
- Provide a regional repository of GIS data for use by local agencies in emergency planning, and response, in a standardized format.
- Enter into mutual aid agreements with other local jurisdictions, in coordination with the California OES, in the event that an event disrupts the jurisdiction's ability to function.

2A.8 cont.

- MM-USS-4(b):
  - Reduce exterior consumptive uses of water in public areas, and should promote reductions in private homes and businesses, by shifting to drought-tolerant native landscape plantings (xeriscaping), using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives.

- Promote the availability of drought-resistant landscaping options and provide information on where these can be purchased. Use of reclaimed water especially in median landscaping and hillside landscaping can and should be implemented where feasible.
- Implement water conservation best practices such as low-flow toilets, water-efficient clothes washers, water system audits, and leak detection and repair.
- Ensure that projects requiring continual dewatering facilities implement monitoring systems and long-term administrative procedures to ensure proper water management that prevents degrading of surface water and minimizes, to the greatest extent possible, adverse impacts on groundwater for the life of the project. Comply with appropriate building codes and standard practices including the Uniform Building Code.
- Maximize, where practical and feasible, permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. Minimized new impervious surfaces to the greatest extent possible, including the use of in-lieu fees and off-site mitigation.
- Avoid designs that require continual dewatering where feasible.
- Where feasible, do not site transportation facilities in groundwater recharge areas, to prevent conversion of those areas to impervious surface.

2A.8 cont.

- MM-USS-6(b):
  - Integrate green building measures consistent with CALGreen (California Building Code Title 24) into project design including, but not limited to the following:
  - Reuse and minimization of construction and demolition (C&D) debris and diversion of C&D waste from landfills to recycling facilities.
  - Inclusion of a waste management plan that promotes maximum C&D diversion.

- Source reduction through (1) use of materials that are more durable and easier to repair and maintain, (2) design to generate less scrap material through dimensional planning, (3) increased recycled content, (4) use of reclaimed materials, and (5) use of structural materials in a dual role as finish material (e.g., stained concrete flooring, unfinished ceilings, etc.).
- Reuse of existing structure and shell in renovation projects.
- Design for deconstruction without compromising safety.
- Design for flexibility through the use of moveable walls, raised floors, modular furniture, moveable task lighting and other reusable building components.
- Development of indoor recycling program and space.
- Discourage the siting of new landfills unless all other waste reduction and prevention actions have been fully explored. If landfill siting or expansion is necessary, site landfills with an adequate landfill-owned, undeveloped land buffer to minimize the potential adverse impacts of the landfill in neighboring communities.
- Locally generated waste should be disposed of regionally, considering distance to disposal site. Encourage disposal near where the waste originates as much as possible. Promote green technologies for long-distance transport of waste (e.g., clean engines and clean locomotives or electric rail for waste-by-rail disposal systems) and consistency with SCAQMD and 2016 RTP/SCS policies can and should be required.
- Encourage waste reduction goals and practices and look for opportunities for voluntary actions to exceed the 50 percent waste diversion target.
- Encourage the development of local markets for waste prevention, reduction, and recycling practices by supporting recycled content and green procurement policies, as well as other waste prevention, reduction and recycling practices.

2A.8 cont.

- Develop ordinances that promote waste prevention and recycling activities such as: requiring waste prevention and recycling efforts at all large events and venues; implementing recycled content procurement programs; and developing opportunities to divert food waste away from landfills and toward food banks and composting facilities.
- Develop alternative waste management strategies such as composting, recycling, and conversion technologies.
- Develop and site composting, recycling, and conversion technology facilities that have minimum environmental and health impacts.
- Require the reuse and recycle construction and demolition waste (including, but not limited to, soil, vegetation, concrete, lumber, metal, and cardboard).
- Integrate reuse and recycling into residential industrial, institutional and commercial projects.
- Provide recycling opportunities for residents, the public, and tenant businesses.
- Provide education and publicity about reducing waste and available recycling services.
- Continue to adopt programs to comply with state solid waste diversion rate mandates and, where possible, encourage further recycling to exceed these rates.
- Implement or expand city or county-wide recycling and composting programs for residents and businesses. This could include extending the types of recycling services offered (e.g., to include food and green waste recycling) and providing public education and publicity about recycling services.

2A.8 cont.

- 2020-2045 RTP/SCS and the Connect SoCal PEIR Addendum #1, approved September 3, 2020[15]
  - PMM AES-1:
    - Use a palette of colors, textures, building materials that are graffiti-resistant, and/or plant materials that complement the surrounding landscape and development.
    - Use contour grading to better match surrounding terrain. Contour edges of major cut-and-fill to provide a more natural looking finished profile.
    - Design new corridor landscaping to respect existing natural and man-made features and to complement the dominant landscaping of the surrounding areas.
    - Replace and renew landscaping along corridors with road widenings, interchange projects, and related improvements.
    - Retain or replace trees bordering highways, so that clear-cutting is not evident.
    - Provide new corridor landscaping that respects and provides appropriate transition to existing natural and man-made features and is complementary to the dominant landscaping or native habitats of surrounding areas.
    - Reduce the visibility of construction staging areas by fencing and screening these areas with low contrast materials consistent with the surrounding environment, and by revegetating graded slopes and exposed earth surfaces at the earliest opportunity;

2A.8 cont.

[15] SCAG (Sept. 3, 2020) A Resolution of the Southern California Association of Governments (SCAG) Adopting the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal) Program Environmental Impact Report (PEIR) Addendum and Approving Connect SoCal in its Entirety, Exhibit A, "Revised Mitigation Monitoring and Reporting Program, *available at* https://scag.ca.gov/sites/main/files/file-attachments/exhibit-a_connectsocal_peir_revisedmmrp.pdf?1606004474 at pp. 2 – 52.

- Use see-through safety barrier designs (e.g. railings rather than walls)

- PMM AES-2:
  - Minimize contrasts in scale and massing between the projects and surrounding natural forms and development, minimize their intrusion into important viewsheds, and use contour grading to better match surrounding terrain in accordance with county and city hillside ordinances, where applicable.
  - Design landscaping along highway corridors to add significant natural elements and visual interest to soften the hard-edged, linear transportation corridors.
  - Require development of design guidelines for projects that make elements of proposed buildings/facilities visually compatible or minimize visibility of changes in visual quality or character through use of hardscape and softscape solutions. Specific measures to be addressed include setback buffers, landscaping, color, texture, signage, and lighting criteria.
  - Design projects consistent with design guidelines of applicable general plans.
  - Require that sites are kept in a blight/nuisance-free condition. Remove blight or nuisances that compromise visual character or visual quality of project areas including graffiti abatement, trash removal, landscape management, maintenance of signage and billboards in good condition, and replace compromised native vegetation and landscape.
  - Where sound walls are proposed, require sound wall construction and design methods that account for visual impacts as follows:
  - use transparent panels to preserve views where sound walls would block views from residences;
  - use landscaped earth berm or a combination wall and berm to minimize the apparent sound wall height;

2A.8 cont.

- construct sound walls of materials whose color and texture complements the surrounding landscape and development;
- Design sound walls to increase visual interest, reduce apparent height, and be visually compatible with the surrounding area; and landscape the sound walls with plants that screen the sound wall, preferably with either native vegetation or landscaping that complements the dominant landscaping of surrounding areas

- PMM AES-3:
  - Use lighting fixtures that are adequately shielded to a point below the light bulb and reflector and that prevent unnecessary glare onto adjacent properties.
  - Restrict the operation of outdoor lighting for construction and operation activities to the hours of 7:00 a.m. to 10:00 p.m. or as otherwise required by applicable local rules or ordinances.
  - Use high pressure sodium and/or cut-off fixtures instead of typical mercury-vapor fixtures for outdoor lighting.
  - Use unidirectional lighting to avoid light trespass onto adjacent properties.
  - Design exterior lighting to confine illumination to the project site, and/or to areas which do not include light-sensitive uses.
  - Provide structural and/or vegetative screening from light-sensitive uses.
  - Shield and direct all new street and pedestrian lighting away from light-sensitive off-site uses.
  - Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces.
  - Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties.
- PMM AG-1:

2A.8 cont.

- Require project sponsors to mitigate for loss of farmland by providing permanent protection of in-kind farmland in the form of easements, fees, or elimination of development rights/potential.
- Project relocation or corridor realignment to avoid Prime Farmland, Unique Farmland, or Farmland of Local or Statewide Importance.
- Maintain and expand agricultural land protections such as urban growth boundaries.
- Provide for mitigation fees to support a mitigation bank that invests in farmer education, agricultural infrastructure, water supply, marketing, etc. that enhance the commercial viability of retained agricultural lands.
- Minimize severance and fragmentation of agricultural land by constructing underpasses and overpasses at reasonable intervals to provide property access.
- Use berms, buffer zones, setbacks, and fencing to reduce conflicts between new development and farming uses and protect the functions of farmland.

2A.8 cont.

- PMM AG-2:
  - Project relocation or corridor realignment to avoid lands in Williamson Act contracts.
  - Establish conservation easements consistent with the recommendations of the Department of Conservation, or 20-year Farmland Security Zone contracts (Government Code Section 51296 et seq.), 10-year Williamson Act contracts (Government Code Section 51200 et seq.), or use of other conservation tools available from the California Department of Conservation Division of Land Resource Protection.
- PMM AG-3:

- Minimize construction related impacts to agricultural and forestry resources by locating materials and stationary equipment in such a way as to prevent conflict with agriculture and forestry resources.

- PMM AG-4:
  - Design proposed projects to minimize, to the greatest extent feasible, the loss of the highest valued agricultural land.
  - Redesign project features to minimize fragmenting or isolating Farmland. Where a project involves acquiring land or easements, ensure that the remaining non-project area is of a size sufficient to allow economically viable farming operations. The project proponents shall be responsible for acquiring easements, making lot line adjustments, and merging affected land parcels into units suitable for continued commercial agricultural management.
  - Reconnect utilities or infrastructure that serve agricultural uses if these are disturbed by project construction. If a project temporarily or permanently cuts off roadway access or removes utility lines, irrigation features, or other infrastructure, the project proponents shall be responsible for restoring access as necessary to ensure that economically viable farming operations are not interrupted.
- PMM AG-5:
  - Manage project operations to minimize the introduction of invasive species or weeds that may affect agricultural production on adjacent agricultural land. Where a project has the potential to introduce sensitive species or habitats or have other spill-over effects on nearby agricultural lands, the project proponents shall be responsible for acquiring easements on nearby agricultural land and/or financially compensating for indirect effects on nearby agricultural land. Easements (e.g., flowage easements) shall be required for temporary or intermittent interruption in farming activities (e.g., because of seasonal flooding or groundwater seepage). Acquisition or compensation would be required for permanent or significant loss of economically viable operations.

2A.8 cont.

- PMM AQ-1:
  - Minimize land disturbance.
  - Suspend grading and earth moving when wind gusts exceed 25 miles per hour unless the soil is wet enough to prevent dust plumes.
  - Cover trucks when hauling dirt.
  - Stabilize the surface of dirt piles if not removed immediately.
  - Limit vehicular paths on unpaved surfaces and stabilize any temporary roads.
  - Minimize unnecessary vehicular and machinery activities.
  - Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway.
  - Revegetate disturbed land, including vehicular paths created during construction to avoid future off-road vehicular activities.
  - On Caltrans projects, Caltrans Standard Specifications 10-Dust Control, 17-Watering, and 18-Dust Palliative shall be incorporated into project specifications.
  - Require contractors to assemble a comprehensive inventory list (i.e., make, model, engine year, horsepower, emission rates) of all heavy-duty off-road (portable and mobile) equipment (50 horsepower and greater) that could be used an aggregate of 40 or more hours for the construction project. Prepare a plan for approval by the applicable air district demonstrating achievement of the applicable percent reduction for a CARB-approved fleet. Daily logging of the operating hours of the equipment should also be required.
  - Ensure that all construction equipment is properly tuned and maintained.
  - Minimize idling time to 5 minutes or beyond regulatory requirements —saves fuel and reduces emissions.

2A.8 cont.

- Provide an operational water truck on-site at all times. Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas. Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway.
- Utilize existing power sources (e.g., power poles) or clean fuel generators rather than temporary power generators.
- Develop a traffic plan to minimize community impacts as a result of traffic flow interference from construction activities. The plan may include advance public notice of routing, use of public transportation, and satellite parking areas with a shuttle service. Schedule operations affecting traffic for off-peak hours. Minimize obstruction of through traffic lanes. Provide a flag person to guide traffic properly and ensure safety at construction sites. Project sponsors should consider developing a goal for minimization of community impacts

2A.8 cont.

- As appropriate require that portable engines and portable engine-driven equipment units used at the project work site, with the exception of on-road and off-road motor vehicles, obtain CARB Portable Equipment Registration with the state or a local district permit. Arrange appropriate consultations with the CARB or the District to determine registration and permitting requirements prior to equipment operation at the site.
- Require projects to use Tier 4 Final equipment or better for all engines above 50 horsepower (hp). In the event that construction equipment cannot meet to Tier 4 Final engine certification, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is approved by SCAG before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, construction equipment with Tier 4 Interim or reduction in the number and/or horsepower rating of construction equipment and/or limiting the number of construction equipment operating at the same time. All

equipment must be tuned and maintained in compliance with the manufacturer's recommended maintenance schedule and specifications. All maintenance records for each equipment and their contractor(s) should make available for inspection and remain on-site for a period of at least two years from completion of construction, unless the individual project can demonstrate that Tier 4 engines would not be required to mitigate emissions below significance thresholds. Project sponsors should also consider including ZE/ZNE technologies where appropriate and feasible. 2A.8 cont.

- Projects located within the South Coast Air Basin should consider applying for South Coast AQMD "SOON" funds which provides funds to applicable fleets for the purchase of commercially available low-emission heavy-duty engines to achieve near-term reduction of NOx emissions from in-use off-road diesel vehicles.
- Projects located within AB 617 communities should review the applicable Community Emissions Reduction Plan (CERP) for additional mitigation that can be applied to individual projects.
- Where applicable, projects should provide information about air quality related programs to schools, including the Environmental Justice Community Partnerships (EJCP), Clean Air Ranger Education (CARE), and Why Air Quality Matters programs.
- Projects should work with local cities and counties to install adequate signage that prohibits truck idling in certain locations (e.g., near schools and sensitive receptors).
- As applicable for airport projects, the following measures should be considered:
- Considering operational improvements to reduce taxi time and auxiliary power unit usage, where feasible. Additionally, consider single engine taxing, if feasible as allowed per Federal Aviation Administration guidelines.
- Set goals to achieve a reduction in emissions from aircraft operations over the lifetime of the proposed project.

- Require the use of ground service equipment (GSE) that can operate on battery-power. If electric equipment cannot be obtained, require the use of alternative fuel, the cleanest gasoline equipment, or Tier 4, at a minimum. Projects should work with local cities and counties to install adequate signage that prohibits truck idling in certain locations (e.g., near schools and sensitive receptors).
- As applicable for port projects, the following measures should be considered: 2A.8 cont.
- Develop specific timelines for transitioning to zero emission cargo handling equipment (CHE).
- Develop interim performance standards with a minimum amount of CHE replacement each year to ensure adequate progress.
- Use short side electric power for ships, which may include tugboats and other ocean-going vessels or develop incentives to gradually ramp up the usage of shore power.
- Install the appropriate infrastructure to provide shore power to operate the ships. Electrical hookups should be appropriately sized.
- Maximize participation in the Port of Los Angeles' Vessel Speed Reduction Program or the Port of Long Beach's Green Flag Initiation Program in order to reduce the speed of vessel transiting within 40 nautical miles of Point Fermin.
- Encourage the participation in the Green Ship Incentives.
- Offer incentives to encourage the use of on-dock rail.
- As applicable for rail projects, the following measures should be considered:
- Provide the highest incentives for electric locomotives and then locomotives that meet Tier 5 emission standards with a floor on the incentives for locomotives that meet Tier 4 emission standards.

- Projects that will introduce sensitive receptors within 500 feet of freeways and other sources should consider installing high efficiency of enhanced filtration units, such as Minimum Efficiency Reporting Value (MERV) 13 or better. Installation of enhanced filtration units can be verified during occupancy inspection prior to the issuance of an occupancy permit.
- Develop an ongoing monitoring, inspection, and maintenance program for the MERV filters.
- Disclose potential health impacts to prospective sensitive receptors from living in close proximity to freeways or other sources of air pollution and the reduced effectiveness of air filtration systems when windows are open or residents are outside.
- Identify the responsible implementing and enforcement agency to ensure that enhanced filtration units are installed on-site before a permit of occupancy is issued.
- Disclose the potential increase in energy costs for running the HVAC system to prospective residents.
- Provide information to residents on where MERV filters can be purchased.
- Provide recommended schedule (e.g., every year or every six months) for replacing the enhanced filtration units.
- Identify the responsible entity such as future residents themselves, Homeowner's Association, or property managers for ensuring enhanced filtration units are replaced on time.
- Identify, provide, and disclose ongoing cost-sharing strategies, if any, for replacing the enhanced filtration units.
- Set criteria for assessing progress in installing and replacing the enhanced filtration units; and
- Develop a process for evaluating the effectiveness of the enhanced filtration units.

2A.8 cont.

- Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities.
- The following criteria related to diesel emissions shall be implemented on by individual project sponsors as appropriate and feasible:
- Diesel nonroad vehicles on site for more than 10 total days shall have either (1) engines that meet EPA on road emissions standards or (2) emission control technology verified by EPA or CARB to reduce PM emissions by a minimum of 85%.

2A.8 cont.

- Diesel generators on site for more than 10 total days shall be equipped with emission control technology verified by EPA or CARB to reduce PM emissions by a minimum of 85%.
- Nonroad diesel engines on site shall be Tier 2 or higher.
- Diesel nonroad construction equipment on site for more than 10 total days shall have either (1) engines meeting EPA Tier 4 nonroad emissions standards or (2) emission control technology verified by EPA or CARB for use with nonroad engines to reduce PM emissions by a minimum of 85% for engines for 50 hp and greater and by a minimum of 20% for engines less than 50 hp.
- Emission control technology shall be operated, maintained, and serviced as recommended by the emission control technology manufacturer.
- Diesel vehicles, construction equipment, and generators on site shall be fueled with ultra-low sulfur diesel fuel (**ULSD**) or a biodiesel blend approved by the original engine manufacturer with sulfur content of 15 ppm or less.
- The construction contractor shall maintain a list of all diesel vehicles, construction equipment, and generators to be used on site. The list shall include the following:
    - i. Contractor and subcontractor name and address, plus contact person responsible for the vehicles or equipment.

- ii. Equipment type, equipment manufacturer, equipment serial number, engine manufacturer, engine model year, engine certification (Tier rating), horsepower, engine serial number, and expected fuel usage and hours of operation.
- iii. For the emission control technology installed: technology type, serial number, make, model, manufacturer, EPA/CARB verification number/level, and installation date and hour-meter reading on installation date.

- The contractor shall establish generator sites and truck-staging zones for vehicles waiting to load or unload material on site. Such zones shall be located where diesel emissions have the least impact on abutters, the general public, and especially sensitive receptors such as hospitals, schools, daycare facilities, elderly housing, and convalescent facilities. 2A.8 cont.
- The contractor shall maintain a monthly report that, for each on road diesel vehicle, nonroad construction equipment, or generator onsite, includes:
  - i. Hour-meter readings on arrival on-site, the first and last day of every month, and on off-site date.
  - ii. Any problems with the equipment or emission controls.
  - iii. Certified copies of fuel deliveries for the time period that identify:
    - 1. Source of supply
    - 2. Quantity of fuel
    - 3. Quantity of fuel, including sulfur content (percent by weight)
- Project should exceed Title-24 Building Envelope Energy Efficiency Standards (California Building Standards Code). The following measures can be used to increase energy efficiency:
- Install programmable thermostat timers

- Obtain Third-party HVAC commissioning and verification of energy savings (to be grouped with exceedance of Title 24).
- Install energy efficient appliances (Typical reductions for energy-efficient appliances can be found in the Energy Star and Other Climate Protection Partnerships Annual Reports.)
- Install higher efficacy public street and area lighting
- Limit outdoor lighting requirements
- Replace traffic lights with LED traffic lights
- Establish onsite renewable or carbon neutral energy systems – generic, solar power and wind power
- Utilize a combined heat and power system
- Establish methane recovery in Landfills and Wastewater Treatment Plants.
- Locate project near bike path/bike lane
- Provide pedestrian network improvements, such as interconnected street network, narrower roadways and shorter block lengths, sidewalks, accessibility to transit and transit shelters, traffic calming measures, parks and public spaces, minimize pedestrian barriers.
- Provide traffic calming measures, such as:
    - Marked crosswalks
    - Count-down signal timers
    - Curb extensions
    - Speed tables
    - Raised crosswalks
    - Raised intersections
    - Median islands
    - Tight corner radii ix. Roundabouts or mini-circles

2A.8 cont.

- On-street parking
- Chicanes/chokers.
- Create urban non-motorized zones
- Provide bike parking in non-residential and multi-unit residential projects
- Dedicate land for bike trails
- Limit parking supply through:
- Elimination (or reduction) of minimum parking requirements
- Creation of maximum parking requirements
- Provision of shared parking
- Require residential area parking permit.
- Provide ride-sharing programs
- Designate a certain percentage of parking spacing for ride sharing vehicles
- Designating adequate passenger loading and unloading and waiting areas for ride-sharing vehicles
- Providing a web site or messaging board for coordinating rides
- Permanent transportation management association membership and finding requirement.

2A.8 cont.

- PMM BIO-1:
  - Require project design to avoid occupied habitat, potentially suitable habitat, and designated critical habitat, wherever practicable and feasible.
  - Where avoidance is determined to be infeasible, provide conservation measures to fulfill the requirements of the applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal ESA, Section 2081 of the California ESA to support issuance of an incidental take permit, and/or as identified in local

or regional plans. Conservation strategies to protect the survival and recovery of federally and state-listed endangered and local special status species may include:

- Impact minimization strategies
- Contribution of in-lieu fees for in-kind conservation and mitigation efforts
- Use of in-kind mitigation bank credits
- Funding of research and recovery efforts
- Habitat restoration
- Establishment of conservation easements
- Permanent dedication of in-kind habitat

2A.8 cont.

- Design projects to avoid desert native plants protected under the California Desert Native Plants Act, salvage and relocate desert native plants, and/or pay in lieu fees to support off-site long-term conservation strategies.
- Temporary access roads and staging areas will not be located within areas containing sensitive plants, wildlife species or native habitat wherever feasible, so as to avoid or minimize impacts to these species.
- Develop and implement a Worker Environmental Awareness Program (environmental education) to inform project workers of their responsibilities to avoid and minimize impacts on sensitive biological resources.
- Retain a qualified botanist to document the presence or absence of special status plants before project implementation.
- Appoint a qualified biologist to monitor construction activities that may occur in or adjacent to occupied sensitive species' habitat to facilitate avoidance of resources not permitted for impact.
- Appoint a qualified biologist to monitor implementation of mitigation measures.

- Schedule construction activities to avoid sensitive times for biological resources (e.g. steelhead spawning periods during the winter and spring, nesting bird season) and to avoid the rainy season when erosion and sediment transport is increased.
- Develop an invasive species control plan associated with project construction.
- If construction occurs during breeding seasons in or adjacent to suitable habitat, include appropriate sound attenuation measures required for sensitive avian species and other best management practices appropriate for potential local sensitive wildlife.
- Conduct pre-construction surveys to delineate occupied sensitive species' habitat to facilitate avoidance.
- Where projects are determined to be within suitable habitat and may impact listed or sensitive species that have specific field survey protocols or guidelines outlined by the USFWS, CDFW, or other local agency, conduct preconstruction surveys that follow applicable protocols and guidelines and are conducted by qualified and/or certified personnel.
- Project design should address the protection of habitat on both sides of a freeway to improve effectiveness of the crossings.
- Project sponsors shall consider the impacts of nitrogen deposition on sensitive species.

2A.8 cont.

- PMM BIO-2:
  - Consult with the USFWS and NMFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal ESA.
  - Consult with the USFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal ESA and any additional species afforded protection by an adopted Forest Land Management Plan

or Resource Management Plan for the four national forests in the six-county area: Angeles, Cleveland, Los Padres, and San Bernardino.

- Consult with the CDFW where such state-designated sensitive or riparian habitats provide potential or occupied habitat for state-listed rare, threatened, and endangered species afforded protection pursuant to the California ESA, or Fully Protected Species afforded protection pursuant to the State Fish and Game Code. 2A.8 cont.
- Consult with the CDFW pursuant to the provisions of Section 1600 of the State Fish and Game Code as they relate to Lakes and Streambeds.
- Consult with the USFWS, USFS, CDFW, and counties and cities in the SCAG region, where state-designated sensitive or riparian habitats are occupied by birds afforded protection pursuant to the MBTA during the breeding season.
- Consult with the CDFW for state-designated sensitive or riparian habitats where furbearing mammals, afforded protection pursuant to the provisions of the State Fish and Game Code for fur-beaming mammals, are actively using the areas in conjunction with breeding activities.
- Require project design to avoid sensitive natural communities and riparian habitats, wherever practicable and feasible. Where practicable and feasible, require upland buffers that sufficiently minimize impacts to riparian corridors.
- Where avoidance is determined to be infeasible, develop sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) to protect sensitive natural communities and riparian habitats and develop appropriate compensatory mitigation, where required.
- Appoint a qualified wetland biologist to monitor construction activities that may occur in or adjacent to sensitive communities.

- Appoint a qualified wetland biologist to monitor implementation of mitigation measures.
- Schedule construction activities to avoid sensitive times for biological resources and to avoid the rainy season when erosion and sediment transport is increased.
- When construction activities require stream crossings, schedule work during dry conditions and use rubber-wheeled vehicles, when feasible. Have a qualified wetland scientist determine if potential project impacts require a Notification of Lake or Streambed Alteration to CDFW during the planning phase of projects.
- Consult with local agencies, jurisdictions, and landowners where such state-designated sensitive or riparian habitats are afforded protection pursuant an adopted regional conservation plan.
- Install fencing and/or mark sensitive habitat to be avoided during construction activities.
- Salvage and stockpile topsoil (the surface material from 6 to 12 inches deep) and perennial native plants, when recommended by the qualified wetland biologist, for use in restoring native vegetation to areas of temporary disturbance within the project area. Salvage of soils containing invasive species, seeds and/or rhizomes will be avoided as identified by the qualified wetland biologist.
- Revegetate with appropriate native vegetation following the completion of construction activities, as identified by the qualified wetland biologist.
- Complete habitat enhancement (e.g., through removal of non-native invasive wetland species and replacement with more ecologically valuable native species).
- Use Best Management Practices (BMPs) at construction sites to minimize erosion and sediment transport from the area. BMPs include encouraging growth of native vegetation in disturbed

2A.8 cont.

areas, using straw bales or other silt-catching devices, and using settling basins to minimize soil transport.

- PMM BIO-3:
  - Require project design to avoid federally protected aquatic resources consistent with the provisions of Sections 404 and 401 of the CWA, wherever practicable and feasible.
  - Where the lead agency has identified that a project, or other regionally significant project, has the potential to impact other wetlands or waters, such as those considered Waters Of the State of California under the State Wetland Definition and Procedures for Dischargers of Dredged or Fill Material to Waters of the State, not protected under Section 404 or 401 of the CWA, seek comparable coverage for these wetlands and waters in consultation with the SWRCB, applicable RWQCB, and CDFW.
  - Where avoidance is determined to be infeasible, develop sufficient conservation measures to fulfill the requirements of the applicable authorization for impacts to federal and state protected aquatic resource to support issuance of a permit under Section 404 of the CWA as administered by the USACE. The use of an authorized Nationwide Permit or issuance of an individual permit requires the project applicant to demonstrate compliance with the USACE's Final Compensatory Mitigation Rule. The USACE reviews projects to ensure environmental impacts to aquatic resources are avoided or minimized as much as possible. Consistent with the administration's performance standard of "no net loss of wetlands" a USACE permit may require a project proponent to restore, establish, enhance or preserve other aquatic resources in order to replace those affected by the proposed project. This compensatory mitigation process seeks to replace the loss of existing aquatic resource functions and area. Project proponents required to complete mitigation are encouraged to use a watershed approach and watershed planning information. The new rule establishes performance standards, sets timeframes for decision making, and to the extent possible, establishes equivalent

2A.8 cont.

requirements and standards for the three sources of compensatory mitigation:

- Permittee-responsible mitigation
- Contribution of in-kind in-lieu fees
- Use of in-kind mitigation bank credits
- Where avoidance is determined to be infeasible and
- Where avoidance is determined to be infeasible and proposed projects' impacts exceed an existing Nationwide Permit (**NWP**) and/or California SWRCB-certified NWP, or applicable County Special Area Management Plan (**SAMP**), the lead agency should provide USACE and SWRCB (where applicable) an alternative analysis consistent with the Least Environmentally Damaging Practicable Alternatives in this order of priorities:
  - Avoidance
  - Impact Minimization
  - On-site alternatives
  - Off-site alternatives
- Require review of construction drawings by a certified wetland delineator as part of each project-specific environmental analysis to determine whether aquatic resources will be affected and, if necessary, perform formal wetland delineation.

2A.8 cont.

- PMM BIO-4:
  - Consult with the USFS where impacts to migratory wildlife corridors may occur in an area afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-County area: Angeles, Cleveland, Los Padres, and San Bernardino.
  - Consult with counties, cities, and other local organizations when impacts may occur to open space areas that have been designated

as important for wildlife movement related to local ordinances or conservation plans.

- Prohibit construction activities within 500 feet of occupied breeding areas for wildlife afforded protection pursuant to Title 14 § 460 of the California Code of Regulations protecting fur-bearing mammals, during the breeding season.
- Conduct a survey to identify active raptor and other migratory nongame bird nests by a qualified biologist at least two weeks before the start of construction at project sites from February 1 through August 31.
- Prohibit construction activities with 300 feet of occupied nest of birds afforded protection pursuant to the Migratory Bird Treaty Act, during the breeding season.
- Ensure that suitable nesting sites for migratory nongame native bird species protected under the Migratory Bird Treaty Act and/or trees with unoccupied raptor nests should only be removed prior to February 1 or following the nesting season.
- When feasible and practicable, proposed projects will be designed to minimize impacts to wildlife movement and habitat connectivity and preserve existing and functional wildlife corridors.
- Conduct site-specific analyses of opportunities to preserve or improve habitat linkages with areas on- and off-site.
- Long linear projects with the possibility of impacting wildlife movement should analyze habitat linkages/wildlife movement corridors on a broad scale to avoid critical narrow choke points that could reduce function of recognized movement corridor.
- Require review of construction drawings and habitat connectivity mapping by a qualified biologist to determine the risk of habitat fragmentation.

2A.8 cont.

- Pursue mitigation banking to preserve habitat linkages and corridors (opportunities to purchase, maintain, and/or restore offsite habitat).
- When practicable and feasible design projects to promote wildlife corridor redundancy by including multiple connections between habitat patches.
- Evaluate the potential for installation of overpasses, underpasses, and culverts to create wildlife crossings in cases where a roadway or other transportation project may interrupt the flow of species through their habitat. Retrofitting of existing infrastructure in project areas should also be considered for wildlife crossings for purposes of mitigation.
- Install wildlife fencing where appropriate to minimize the probability of wildlife injury due to direct interaction between wildlife and roads or construction.
- Where avoidance is determined to be infeasible, design sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) and in accordance with the respective counties and cities general plans to establish plans to mitigate for the loss of fish and wildlife movement corridors and/or wildlife nursery sites. The consideration of conservation measures may include the following measures, in addition to the measures outlined in MMBIO-1(b), where applicable:
  - Wildlife movement buffer zones
  - Corridor realignment
  - Appropriately spaced breaks in center barriers
  - Stream rerouting
  - Culverts
  - Creation of artificial movement corridors such as freeway under- or overpasses

2A.8 cont.

- Other comparable measures

- Where the lead agency has identified that a RTP/SCS project, or other regionally significant project, has the potential to impact other open space or nursery site areas, seek comparable coverage for these areas in consultation with the USFWS, CDFW, NMFS, or other local jurisdictions.
- Incorporate applicable and appropriate guidance (e.g. FHWA-HEP-16-059), as well as best management practices, to benefit pollinators with a focus on native plants. 2A.8 cont.
- Implement berms and sound/sight barriers at all wildlife crossings to encourage wildlife to utilize crossings. Sound and lighting should also be minimized in developed areas, particularly those that are adjacent to or go through natural habitats.
- Reduce lighting impacts on sensitive species through implementation of mitigation measures such as, but not limited to:
- Use high pressure sodium and/or cut-off fixtures instead of typical mercury vapor fixtures for outdoor lighting.
- Design exterior lighting to confine illumination to the project site
- Provide structural and/or vegetative screening from light-sensitive uses.
- Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces.
- Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties.
- Reduce noise impacts to sensitive species through implementation of mitigation measures such as, but not limited to:
- Install temporary noise barriers during construction.

- Include permanent noise barriers and sound-attenuating features as part of the project design. Barriers could be in the form of outdoor barriers, sound walls, buildings, or earth berms to attenuate noise at adjacent sensitive uses.
- Ensure that construction equipment are properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded.
- Use hydraulically or electrically powered tools (e.g., jack hammers, pavement breakers, and rock drills) for project construction to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust should be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves should be used, if such jackets are commercially available, and this could achieve a further reduction of 5 dBA. Quieter procedures should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures.
- Using rubberized asphalt or "quiet pavement" to reduce road noise for new roadway segments, roadways in which widening or other modifications require re-pavement, or normal reconstruction of roadways where re-pavement is planned
- Use equipment and trucks with the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds, wherever feasible) for project construction.

2A.8 cont.

- Use techniques such as grade separation, buffer zones, landscaped berms, dense plantings, sound walls, reduced-noise paving materials, and traffic calming measures. u.
- Require large buffers between sensitive uses and freeways.
- Create corridor redundancy to help retain functional connectivity and resilience.

- PMM BIO-5:

2A.8 cont.

  - Consult with the appropriate local agency responsible for the administration of the policy or ordinance protecting biological resources.
  - Prioritize retention of trees on-site consistent with local regulations. Provide adequate protection during the construction period for any trees that are to remain standing, as recommended by an International Society of Arboriculture (ISA) certified arborist.
  - If specific project area trees are designated as "Protected Trees," "Landmark Trees," or "Heritage Trees," obtain approval for encroachment or removals through the appropriate entity, and develop appropriate mitigation measures at that time, to ensure that the trees are replaced. Mitigation trees shall be locally collected native species, as directed by a qualified biologist.
  - Appoint an ISA certified arborist to monitor construction activities that may occur in areas with trees are designated as "Protected Trees," "Landmark Trees," or "Heritage Trees," to facilitate avoidance of resources not permitted for impact. Before the start of any clearing, excavation, construction or other work on the site, securely fence off every protected tree deemed to be potentially endangered by said site work. Keep such fences in place for duration of all such work. Clearly mark all trees to be removed.
  - Establish a scheme for the removal and disposal of logs, brush, earth and other debris that will avoid injury to any protected tree.

Where proposed development or other site work could encroach upon the protected perimeter of any protected tree, incorporate special measures to allow the roots to breathe and obtain water and nutrients. Minimize any excavation, cutting, filing, or compaction of the existing ground surface within the protected perimeter. Require that no change in existing ground level occur from the base of any protected tree at any time. Require that no burning or use of equipment with an open flame occur near or within the protected perimeter of any protected tree. 2A.8 cont.

- Require that no storage or dumping of oil, gas, chemicals, or other substances that may be harmful to trees occur from the base of any protected trees, or any other location on the site from which such substances might enter the protected perimeter. Require that no heavy construction equipment or construction materials be operated or stored within a distance from the base of any protected trees. Require that wires, ropes, or other devices not be attached to any protected tree, except as needed for support of the tree. Require that no sign, other than a tag showing the botanical classification, be attached to any protected tree.
- Thoroughly spray the leaves of protected trees with water periodically during construction to prevent buildup of dust and other pollution that would inhibit leaf transpiration, as directed by the certified arborist.
- If any damage to a protected tree should occur during or as a result of work on the site, the appropriate local agency will be immediately notified of such damage. If, such tree cannot be preserved in a healthy state, as determined by the certified arborist, require replacement of any tree removed with another tree or trees on the same site deemed adequate by the local agency to compensate for the loss of the tree that is removed. Remove all debris created as a result of any tree removal work from the property within two weeks of debris creation, and such debris shall be properly disposed of in accordance with all applicable laws, ordinances, and regulations. Design projects to avoid

conflicts with local policies and ordinances protecting biological resources

- Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the applicable policy or ordinance shall be developed, such as to support issuance of a tree removal permit. The consideration of conservation measures may include:
- Avoidance strategies
- Contribution of in-lieu fees
- Planting of replacement trees
- Re-landscaping areas with native vegetation post-construction
- Other comparable measures developed in consultation with local agency and certified arborist.

2A.8 cont.

- PMM BIO-6:
  - Consult with the appropriate federal, state, and/or local agency responsible for the administration of HCPs or NCCPs.
  - Wherever practicable and feasible, the project shall be designed to avoid lands preserved under the conditions of an HCP or NCCP.
  - Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the HCP and/or NCCP, which would include but not be limited to applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal Endangered Species Act or Section 2081 of the California ESA, shall be developed to support issuance of an incidental take permit or any other permissions required for development within the HCP/NCCP boundaries. The consideration of additional conservation measures would include the measures outlined in SMM-BIO-2, where applicable.
- PMM CULT-1:
  - Pursuant to CEQA Guidelines Section 15064.5, conduct a record search during the project planning phase at the appropriate

Information Center to determine whether the project area has been previously surveyed and whether historical resources were identified.

- During the project planning phase, retain a qualified architectural historian, defined as an individual who meets the Secretary of the Interior's (SOI) Professional Qualification Standards (PQS) in Architectural History, to conduct historic architectural surveys if a built environment resource greater than 45 years in age may be affected by the project or if recommended by the Information Center.

2A.8 cont.

- Comply with Section 106 of the National Historic Preservation Act (NHPA) including, but not limited to, projects for which federal funding or approval is required for the individual project. This law requires federal agencies to evaluate the impact of their actions on resources included in or eligible for listing in the National Register. Federal agencies must coordinate with the State Historic Preservation Officer in evaluating impacts and developing mitigation. These mitigation measures may include, but are not limited to the following:
- Employ design measures to avoid historical resources and undertake adaptive reuse where appropriate and feasible. If resources are to be preserved, as feasible, carry out the maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction in a manner consistent with the Secretary of the Interior's Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings. If resources would be impacted, impacts should be minimized to the extent feasible.
- Where feasible, noise buffers/walls and/or visual buffers/landscaping should be constructed to preserve the contextual setting of significant built resources.
- If a project requires the relocation, rehabilitation, or alteration of an eligible historical resource, the Secretary of the Interior's

Standards for the Treatment of Historic Properties should be used to the maximum extent possible to ensure the historical significance of the resource is not impaired. The application of the standards should be overseen by an architectural historian or historic architect meeting the SOI PQS. Prior to any construction activities that may affect the historical resource, a report, meeting industry standards, should identify and specify the treatment of character-defining features and construction activities and be provided to the Lead Agency for review and approval.

2A.8 cont.

- If a project would result in the demolition or significant alteration of a historical resource eligible for or listed in the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), or local register, recordation should take the form of Historic American Buildings Survey (HABS), Historic American Engineering Record (HAER), or Historic American Landscape Survey (HALS) documentation, and should be performed by an architectural historian or historian who meets the SOI PQS. Recordation should meet the SOI Standards and Guidelines for Architectural and Engineering, which defines the products acceptable for inclusion in the HABS/HAER/HALS collection at the Library of Congress. The specific scope and details of documentation should be developed at the project level in coordination with the Lead Agency.
- During the project planning phase, obtain a qualified archaeologist, defined as one who meets the SOI PQS for archaeology, to conduct a record search at the appropriate Information Center of the California Historical Resources Information System (**CHRIS**) to determine whether the project area has been previously surveyed and whether resources were identified.
- Contact the NAHC to request a Sacred Lands File search and a list of relevant Native American contacts who may have additional information.

- During the project planning phase, obtain a qualified archaeologist or architectural historian (depending on applicability) to conduct archaeological and/or historic architectural surveys as recommended by the qualified professional, the Lead Agency, or the Information Center. In the event the qualified professional or Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for archaeological resources. Survey shall be conducted where the records indicate that no previous survey has been conducted, or if survey has not been conducted within the past 10 years. If tribal resources are identified during tribal outreach, consultation, or the record search, a Native American representative traditionally affiliated with the project area, as identified by the NAHC, shall be given the opportunity to provide a representative or monitor to assist with archaeological surveys. 2A.8 cont.
- If potentially significant archaeological resources are identified through survey, and impacts to these resources cannot be avoided, a Phase II Testing and Evaluation investigation should be performed by a qualified archaeologist prior to any construction-related ground-disturbing activities to determine significance. If resources determined significant or unique through Phase II testing, and avoidance is not possible, appropriate resource-specific mitigation measures should be established by the lead agency, in consultation with consulting tribes, where appropriate, and undertaken by qualified personnel. These might include a Phase III data recovery program implemented by a qualified archaeologist and performed in accordance with the OHP's Archaeological Resource Management Reports (**ARMR**): Recommended Contents and Format and Guidelines for Archaeological Research Designs. Additional options can include 1) interpretative signage, or 2) educational outreach that helps inform the public of the past activities that occurred in this area. Should the project require extended Phase I testing, Phase II evaluation, or Phase III data recovery, a Native American

representative traditionally affiliated with the project area, as indicated by the NAHC, shall be given the opportunity to provide a representative or monitor to assist with the archaeological assessments. The long-term disposition of archaeological materials collected from a significant resource should be determined in consultation with the affiliated tribe(s), where relevant; this could include curation with a recognized scientific or educational repository, transfer to the tribe, or respectful reinternment in an area designated by the tribe.

2A.8 cont.

- In cases where the project area is developed and no natural ground surface is exposed, sensitivity for subsurface resources should be assessed based on review of literature, geology, site development history, and consultation with tribal parties. If this archaeological desktop assessment indicates that the project is located in an area sensitive for archaeological resources, as determined by the Lead Agency in consultation with a qualified archaeologist, the project should retain an archaeological monitor and, in the case of sensitivity for tribal resources, a tribal monitor, to observe ground disturbing operations, including but not limited to grading, excavation, trenching, or removal of existing features of the subject property. The archaeological monitor should be supervised by an archaeologist meeting the SOI PQS
- Conduct construction activities and excavation to avoid cultural resources (if identified). If avoidance is not feasible, further work may be needed to determine the importance of a resource. Retain a qualified archaeologist, and/or as appropriate, a qualified architectural historian who should make recommendations regarding the work necessary to assess significance. If the cultural resource is determined to be significant under state or federal guidelines, impacts to the cultural resource will need to be mitigated.
- Stop construction activities and excavation in the area where cultural resources are found until a qualified archaeologist can determine whether these resources are significant, and tribal

consultation can be conducted, in the case of tribal resources. If the archaeologist determines that the discovery is significant, its long-term disposition should be determined in consultation with the affiliated tribe(s); this could include curation with a recognized scientific or educational repository, transfer to the tribe, or respectful reinternment in an area designated by the tribe.

- PMM CULT-2:
- In the event of discovery or recognition of any human remains during construction or excavation activities associated with the project, in any location other than a dedicated cemetery, cease further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the coroner of the county in which the remains are discovered has been informed and has determined that no investigation of the cause of death is required.
- If any discovered remains are of Native American origin, as determined by the county Coroner, an experienced osteologist, or another qualified professional:
- Contact the County Coroner to contact the NAHC to designate a Native American Most Likely Descendant (MLD). The MLD should make a recommendation to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods. This may include obtaining a qualified archaeologist or team of archaeologists to properly excavate the human remains. In some cases, it is necessary for the Lead Agency, qualified archaeologist, or developer to also reach out to the NAHC to coordinate and ensure notification in the event the Coroner is not available.
- If the NAHC is unable to identify a MLD, or the MLD fails to make a recommendation within 48 hours after being notified by the commission, or the landowner or his representative rejects the recommendation of the MLD and the mediation by the NAHC

2A.8 cont.

fails to provide measures acceptable to the landowner, obtain a culturally affiliated Native American monitor, and an archaeologist, if recommended by the Native American monitor, and rebury the Native American human remains and any associated grave goods, with appropriate dignity, on the property and in a location that is not subject to further subsurface disturbance.

2A.8 cont.

- PMM GEO-1:
  - Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that site-specific geotechnical investigations conducted by a qualified geotechnical expert are conducted to ascertain soil types prior to preparation of project designs. These investigations can and should identify areas of potential failure and recommend remedial geotechnical measures to eliminate any problems.
  - Consistent with the requirements of the State Water Resources Control Board (SWRCB) for projects over one acre in size, obtain coverage under the General Construction Activity Storm Water Permit (General Construction Permit) issued by the SWRCB and prepare a stormwater pollution prevention plan (SWPPP) and submit the plan for review and approval by the Regional Water Quality Control Board (**RWQCB**). At a minimum, the SWPPP should include a description of construction materials, practices, and equipment storage and maintenance; a list of pollutants likely to contact stormwater; site-specific erosion and sedimentation control practices; a list of provisions to eliminate or reduce discharge of materials to stormwater; best management practices (**BMPs**); and an inspection and monitoring program.
  - Consistent with the requirements of the SWRCB and local regulatory agencies with oversight of development associated with the Plan, ensure that project designs provide adequate slope drainage and appropriate landscaping to minimize the occurrence of slope instability and erosion. Design features should include

measures to reduce erosion caused by storm water. Road cuts should be designed to maximize the potential for revegetation.

- Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that, prior to preparing project designs, new and abandoned wells are identified within construction areas to ensure the stability of nearby soils.

2A.8 cont.

- PMM GEO-2:
  - Ensure compliance with the Paleontological Resources Preservation Act, the Federal Land Policy and Management Act, the Antiquities Act, Section 5097.5 of the Public Resources Code (PRC), adopted county and city general plans, and other federal, state and local regulations, as applicable and feasible, by adhering to and incorporating the performance standards and practices from the 2010 Society for Vertebrate Paleontology (SVP) standard procedures for the assessment and mitigation of adverse impacts to paleontological resources.
  - Obtain review by a qualified paleontologist (e.g. who meets the SVP standards for a Principal Investigator or Project Paleontologist or the Bureau of Land Management (BLM) standards for a Principal Investigator), to determine if the project has the potential to require ground disturbance of parent material with potential to contain unique paleontological or resources, or to require the substantial alteration of a unique geologic feature. The assessment should include museum records searches, a review of geologic mapping and the scientific literature, geotechnical studies (if available), and potentially a pedestrian survey, if units with paleontological potential are present at the surface.
  - Avoid exposure or displacement of parent material with potential to yield unique paleontological resources.
  - Where avoidance of parent material with the potential to yield unique paleontological resources is not feasible:

- All on-site construction personnel receive Worker Education and Awareness Program (WEAP) training prior to the commencement of excavation work to understand the regulatory framework that provides for protection of paleontological resources and become familiar with diagnostic characteristics of the materials with the potential to be encountered.
- A qualified paleontologist prepares a Paleontological Resource Management Plan (PRMP) to guide the salvage, documentation and repository of unique paleontological resources encountered during construction. The PRMP should adhere to and incorporate the performance standards and practices from the 2010 SVP Standard procedures for the assessment and mitigation of adverse impacts to paleontological resources. If unique paleontological resources are encountered during construction, use a qualified paleontologist to oversee the implementation of the PRMP.
- Monitor ground disturbing activities in parent material, with a moderate to high potential to yield unique paleontological resources using a qualified paleontological monitor meeting the standards of the SVP or the BLM to determine if unique paleontological resources are encountered during such activities, consistent with the specified or comparable protocols.
- Identify where ground disturbance is proposed in a geologic unit having the potential for containing fossils and specify the need for a paleontological monitor to be present during ground disturbance in these areas.
- Avoid routes and project designs that would permanently alter unique geological features.
- Salvage and document adversely affected resources sufficient to support ongoing scientific research and education.
- Significant recovered fossils should be prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility.

2A.8 cont.

- Following the conclusion of the paleontological monitoring, the qualified paleontologist should prepare a report stating that the paleontological monitoring requirement has been fulfilled and summarize the results of any paleontological finds. The report should be submitted to the lead CEQA and the repository curating the collected artifacts, and should document the methods and results of all work completed under the PRMP, including treatment of paleontological materials, results of specimen processing, analysis, and research, and final curation arrangements.

2A.8 cont.

- PMM GHG-1:
  - Integrate green building measures consistent with CALGreen (California Building Code Title 24), local building codes and other applicable laws, into project design including:
  - Use energy efficient materials in building design, construction, rehabilitation, and retrofit.
  - Install energy-efficient lighting, heating, and cooling systems (cogeneration); water heaters; appliances; equipment; and control systems.
  - Reduce lighting, heating, and cooling needs by taking advantage of light-colored roofs, trees for shade, and sunlight.
  - Incorporate passive environmental control systems that account for the characteristics of the natural environment.
  - Use high-efficiency lighting and cooking devices.
  - Incorporate passive solar design.
  - Use high-reflectivity building materials and multiple glazing.
  - Prohibit gas-powered landscape maintenance equipment.
  - Install electric vehicle charging stations.
  - Reduce wood burning stoves or fireplaces.

- Provide bike lanes accessibility and parking at residential developments.
- Reduce emissions resulting from projects through implementation of project features, project design, or other measures, such as those described in Appendix F of the State CEQA Guidelines.
- Include off-site measures to mitigate a project's emissions.
- Measures that consider incorporation of Best Available Control Technology (BACT) during design, construction and operation of projects to minimize GHG emissions, including but not limited to:
- Use energy and fuel-efficient vehicles and equipment;
- Deployment of zero- and/or near zero emission technologies;
- Use lighting systems that are energy efficient, such as LED technology;
- Use the minimum feasible amount of GHG-emitting construction materials;
- Use cement blended with the maximum feasible amount of flash or other materials that reduce GHG emissions from cement production;
- Incorporate design measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse;
- Incorporate design measures to reduce energy consumption and increase use of renewable energy;
- Incorporate design measures to reduce water consumption;
- Use lighter-colored pavement where feasible;
- Recycle construction debris to maximum extent feasible;
- Plant shade trees in or near construction projects where feasible; and
- Solicit bids that include concepts listed above.

2A.8 cont.

- Measures that encourage transit use, carpooling, bike-share and car-share programs, active transportation, and parking strategies, including, but not limited to the following:
- Promote transit-active transportation coordinated strategies;
- Increase bicycle carrying capacity on transit and rail vehicles;
- Improve or increase access to transit;
- Increase access to common goods and services, such as groceries, schools, and day care;
- Incorporate affordable housing into the project;
- Incorporate the neighborhood electric vehicle network;
- Orient the project toward transit, bicycle and pedestrian facilities;
- Improve pedestrian or bicycle networks, or transit service;
- Provide traffic calming measures;
- Provide bicycle parking;
- Limit or eliminate park supply through:
- Elimination (or reduction) of minimum parking requirements
- Creation of maximum parking requirements
- Provision of shared parking.
- Unbundle parking costs; Provide parking cash-out programs;
- Implement or provide access to commute reduction program;
- Incorporate bicycle and pedestrian facilities into project designs, maintaining these facilities, and providing amenities incentivizing their use; and planning for and building local bicycle projects that connect with the regional network;
- Improving transit access to rail and bus routes by incentives for construction of transit facilities within developments, and/or providing dedicated shuttle service to transit stations; and

2A.8 cont.

- Adopting employer trip reduction measures to reduce employee trips such as vanpool and carpool programs, providing end-of-trip facilities, and telecommuting programs including but not limited to measures that:
- Provide car-sharing, bike sharing, and ride-sharing programs;
- Provide transit passes;
- Shift single occupancy vehicle trips to carpooling or vanpooling, for example providing ride-matching services;
- Provide incentives or subsidies that increase that use of modes other than single-occupancy vehicle;
- Provide on-site amenities at places of work, such as priority parking for carpools and vanpools, secure bike parking, and showers and locker rooms;
- Provide employee transportation coordinators at employment sites;
- Provide a guaranteed ride home service to users of non-auto modes.
- Designate a percentage of parking spaces for ride-sharing vehicles or high-occupancy vehicles, and provide adequate passenger loading and unloading for those vehicles;
- Land use siting and design measures that reduce GHG emissions, including:
- Developing on infill and brownfields sites;
- Building compact and mixed-use developments near transit;
- Retaining on-site mature trees and vegetation, and planting new canopy trees;
- Measures that increase vehicle efficiency, encourage use of zero and low emissions vehicles, or reduce the carbon content of fuels, including constructing or encouraging construction of electric

2A.8 cont.

vehicle charging stations or neighborhood electric vehicle networks, or charging for electric bicycles; and

- Measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling, composting, and reuse.
- Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities. The measures provided above are also intended to be applied in low income and minority communities as applicable and feasible.
- Require at least five percent of all vehicle parking spaces include electric vehicle charging stations, or at a minimum, require the appropriate infrastructure to facilitate sufficient electric charging for passenger vehicles and trucks to plug-in.
- Encourage telecommuting and alternative work schedules, such as:
  - Staggered starting times
  - Flexible schedules
  - Compressed work weeks
  - Implement commute trip reduction marketing, such as:
  - New employee orientation of trip reduction and alternative mode options
  - Event promotions
  - Publications
  - Implement preferential parking permit program
  - Implement school pool and bus programs
  - Price workplace parking, such as:
  - Explicitly charging for parking for its employees;

2A.8 cont.

- Implementing above market rate pricing;
- Validating parking only for invited guests;
- Not providing employee parking and transportation allowances; and
- Educating employees about available alternatives.

- PMM HAZ-1:
  - Where the construction or operation of projects involves the transport of hazardous material, provide a written plan of proposed routes of travel demonstrating use of roadways designated for the transport of such materials.
  - Specify Project requirements for interim storage and disposal of hazardous materials during construction and operation. Storage and disposal strategies must be consistent with applicable federal, state, and local statutes and regulations. Specify the appropriate procedures for interim storage and disposal of hazardous materials, anticipated to be required in support of operations and maintenance activities, in conformance with applicable federal, state, and local statutes and regulations, in the business plan for projects as applicable and appropriate.
  - Submit a Hazardous Materials Business/Operations Plan for review and approval by the appropriate local agency. Once approved, keep the plan on file with the Lead Agency (or other appropriate government agency) and update, as applicable. The purpose of the Hazardous Materials Business/Operations Plan is to ensure that employees are adequately trained to handle the materials and provides information to the local fire protection agency should emergency response be required. The Hazardous Materials Business/Operations Plan should include the following:
  - The types of hazardous materials or chemicals stored and/or used on-site, such as petroleum fuel products, lubricants, solvents, and cleaning fluids.

2A.8 cont.

- The location of such hazardous materials.
- An emergency response plan including employee training information.
- A plan that describes the way these materials are handled, transported and disposed.
- Follow manufacturer's recommendations on use, storage, and disposal of chemical products used in construction.
- Avoid overtopping construction equipment fuel gas tanks.
- Properly contain and remove grease and oils during routine maintenance of construction equipment.
- Properly dispose of discarded containers of fuels and other chemicals.
- Prior to shipment remove the most volatile elements, including flammable natural gas liquids, as feasible.
- Identify and implement more stringent tank car safety standards.
- Improve rail transportation route analysis, and modification of routes based on that analysis.
- Use the best available inspection equipment and protocols and implement positive train control.
- Reduce train car speeds to 40 miles per hour when passing through urbanized areas of any size.
- Limit storage of crude oil tank cars in urbanized areas of any size and provide appropriate security in storage yards for all shipments.
- Notify in advance county and city emergency operations offices of all crude oil shipments, including a contact number that can provide real-time information in the event of an oil train derailment or accident.
- Report quarterly hazardous commodity flow information, including classification and characterization of materials being

2A.8 cont.

transported, to all first response agencies (49 Code Fed. Regs. 15.5) along the mainline rail routes used by trains carrying crude oil identified.

- Fund training and outfitting emergency response crews that includes the cost of backfilling personnel while in training.
- Undertake annual emergency responses scenario/field based training including Emergency Operations Center Training activations with local emergency response agencies.

2A.8 cont.

- PMM HAZ-2:
  - Removal of the most volatile elements, including flammable natural gas liquids, prior to shipment;
  - More stringent tank car safety standards;
  - Improved rail transportation route analysis, and modification of routes based on that analysis;
  - Utilization of the best available inspection equipment and protocols, and implementation of positive train control;
  - Reduced train car speeds to 40 miles per hour when passing through urbanized areas of any size;
  - Limitations on storage of hazardous materials tank cars in urbanized areas of any size and provide appropriate security in storage yards for all shipments;
  - Advance notification to county and city emergency operations offices of all crude oil and hazardous materials shipments, including a contact number that can provide real-time information in the event of an oil train derailment or accident;
  - Quarterly hazardous commodity flow information, including classification and characterization of materials being transported, to all first response agencies (49 Code Fed. Regs. 15.5) along the mainline rail routes used by trains carrying hazardous materials.
- PMM HAZ-3:

- Where the construction and operation of projects involves the transport of hazardous materials, avoid transport of such materials within one-quarter mile of schools, when school is in session, wherever feasible.
- Where it is not feasible to avoid transport of hazardous materials, within one-quarter mile of schools on local streets, provide notifications of the anticipated schedule of transport of such materials.

2A.8 cont.

- PMM HAZ-4:
  - For any listed sites or sites that have the potential for residual hazardous materials as a result of historic land uses, complete a Phase I Environmental Site Assessment, including a review and consideration of data from all known databases of contaminated sites, during the process of planning, environmental clearance, and construction for projects.
  - Where warranted due to the known presence of contaminated materials, submit to the appropriate agency responsible for hazardous materials/wastes oversight a Phase II Environmental Site Assessment report if warranted by a Phase I report for the project site. The reports should make recommendations for remedial action, if appropriate, and be signed by a Registered Environmental Assessor, Professional Geologist, or Professional Engineer.
  - Implement the recommendations provided in the Phase II Environmental Site Assessment report, where such a report was determined to be necessary for the construction or operation of the project, for remedial action.
  - Submit a copy of all applicable documentation required by local, state, and federal environmental regulatory agencies, including but not limited to: permit applications, Phase I and II Environmental Site Assessments, human health and ecological risk assessments, remedial action plans, risk management plans, soil management plans, and groundwater management plans.

- Conduct soil sampling and chemical analyses of samples, consistent with the protocols established by the U.S. EPA to determine the extent of potential contamination beneath all underground storage tanks (USTs), elevator shafts, clarifiers, and subsurface hydraulic lifts when on-site demolition or construction activities would potentially affect a particular development or building. 2A.8 cont.
- Consult with the appropriate local, state, and federal environmental regulatory agencies to ensure sufficient minimization of risk to human health and environmental resources, both during and after construction, posed by soil contamination, groundwater contamination, or other surface hazards including, but not limited to, underground storage tanks, fuel distribution lines, waste pits and sumps.
- Obtain and submit written evidence of approval for any remedial action if required by a local, state, or federal environmental regulatory agency.
- Cease work if soil, groundwater, or other environmental medium with suspected contamination is encountered unexpectedly during construction activities (e.g., identified by odor or visual staining, or if any underground storage tanks, abandoned drums, or other hazardous materials or wastes are encountered), in the vicinity of the suspect material. Secure the area as necessary and take all appropriate measures to protect human health and the environment, including but not limited to, notification of regulatory agencies and identification of the nature and extent of contamination. Stop work in the areas affected until the measures have been implemented consistent with the guidance of the appropriate regulatory oversight authority.
- Soil generated by construction activities should be stockpiled on-site in a secure and safe manner. All contaminated soils determined to be hazardous or non-hazardous waste must be adequately profiled (sampled) prior to acceptable reuse or disposal at an appropriate off-site facility. Complete sampling and handling

and transport procedures for reuse or disposal, in accordance with applicable local, state and federal laws and policies.

- Groundwater pumped from the subsurface should be contained on-site in a secure and safe manner, prior to treatment and disposal, to ensure environmental and health issues are resolved pursuant to applicable laws and policies. Utilize engineering controls, which include impermeable barriers to prohibit groundwater and vapor intrusion into the building.

2A.8 cont.

- As needed and appropriate, prior to issuance of any demolition, grading, or building permit, submit for review and approval by the Lead Agency (or other appropriate government agency) written verification that the appropriate federal, state and/or local oversight authorities, including but not limited to the Regional Water Quality Control Board (RWQCB), have granted all required clearances and confirmed that the all applicable standards, regulations, and conditions have been met for previous contamination at the site.
- Develop, train, and implement appropriate worker awareness and protective measures to assure that worker and public exposure is minimized to an acceptable level and to prevent any further environmental contamination as a result of construction.
- If asbestos-containing materials (ACM) are found to be present in building materials to be removed, submit specifications signed by a certified asbestos consultant for the removal, encapsulation, or enclosure of the identified ACM in accordance with all applicable laws and regulations, including but not necessarily limited to: California Code of Regulations, Title 8; Business and Professions Code; Division 3; California Health and Safety Code Section 25915-25919.7; and other local regulations.
- Where projects include the demolitions or modification of buildings constructed prior to 1978, complete an assessment for the potential presence or lack thereof of ACM, lead based paint,

and any other building materials or stored materials classified as hazardous waste by state or federal law.

- Where the remediation of lead-based paint has been determined to be required, provide specifications to the appropriate agency, signed by a certified Lead Supervisor, Project Monitor, or Project Designer for the stabilization and/or removal of the identified lead paint in accordance with all applicable laws and regulations, including but not necessarily limited to: California Occupational Safety and Health Administration's (Cal OSHA's) Construction Lead Standard, Title 8 California Code of Regulations (CCR) Section 1532.1 and Department of Health Services (DHS) Regulation 17 CCR Sections 35001-36100, as may be amended. If other materials classified as hazardous waste by state or federal law are present, the project sponsor should submit written confirmation to the appropriate local agency that all state and federal laws and regulations should be followed when profiling, handling, treating, transporting, and/or disposing of such materials.

2A.8 cont.

- PMM HAZ-5:
  - Continue to coordinate locally and regionally based on ongoing review and integration of projected transportation and circulation conditions.
  - Develop new methods of conveying projected and real time information to citizens using emerging electronic communication tools including social media and cellular networks;
  - Continue to evaluate lifeline routes for movement of emergency supplies and evacuation.
- PMM HYD-1:
  - Complete, and have approved, a Stormwater Pollution Prevention Plan (SWPPP) prior to initiation of construction.

- Implement Best Management Practices to reduce the peak stormwater runoff from the project site to the maximum extent practicable.
- Comply with the Caltrans storm water discharge permit as applicable; and identify and implement Best Management Practices to manage site erosion, wash water runoff, and spill control.
- Complete, and have approved, a Standard Urban Stormwater Management Plan, prior to occupancy of residential or commercial structures.
- Ensure adequate capacity of the surrounding stormwater system to support stormwater runoff from new or rehabilitated structures or buildings.
- Prior to construction within an area subject to Section 404 of the Clean Water Act, obtain all required permit approvals and certifications for construction within the vicinity of a watercourse:
- Where feasible, restore or expand riparian areas such that there is no net loss of impervious surface as a result of the project.
- Install structural water quality control features, such as drainage channels, detention basins, oil and grease traps, filter systems, and vegetated buffers to prevent pollution of adjacent water resources by polluted runoff where required by applicable urban storm water runoff discharge permits, on new facilities.
- Provide operational best management practices for street cleaning, litter control, and catch basin cleaning are implemented to prevent water quality degradation in compliance with applicable storm water runoff discharge permits; and ensure treatment controls are in place as early as possible, such as during the acquisition process for rights-of-way, not just later during the facilities design and construction phase.
- Comply with applicable municipal separate storm sewer system discharge permits as well as Caltrans' storm water discharge

2A.8 cont.

permit including long-term sediment control and drainage of roadway runoff.

- Incorporate as appropriate treatment and control features such as detention basins, infiltration strips, and porous paving, other features to control surface runoff and facilitate groundwater recharge into the design of new transportation projects early on in the process to ensure that adequate acreage and elevation contours are provided during the right-of-way acquisition process.

2A.8 cont.

- Upgrade stormwater drainage facilities to accommodate any increased runoff volumes. These upgrades may include the construction of detention basins or structures that will delay peak flows and reduce flow velocities, including expansion and restoration of wetlands and riparian buffer areas. System designs shall be completed to eliminate increases in peak flow rates from current levels. m) Encourage Low Impact Development (LID) and incorporation of natural spaces that reduce, treat, infiltrate and manage stormwater runoff flows in all new developments, where practical and feasible.

- PMM HYD-2:

  - Avoid designs that require continual dewatering where feasible. For projects requiring continual dewatering facilities, implement monitoring systems and long-term administrative procedures to ensure proper water management that prevents degrading of surface water and minimizes adverse impacts on groundwater for the life of the project, Construction designs shall comply with appropriate building codes and standard practices including the Uniform Building Code.

  - Maximize, where practical and feasible, permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. Minimize new impervious surfaces, including the use of in-lieu fees and off-site mitigation.

- Avoid construction and siting on groundwater recharge areas, to prevent conversion of those areas to impervious surface.
- Reduce hardscape to the extent feasible to facilitate groundwater recharge as appropriate.

- PMM HYD-4:
  - Ensure that all roadbeds for new highway and rail facilities be elevated at least one foot above the 100-year base flood elevation. Since alluvial fan flooding is not often identified on FEMA flood maps, the risk of alluvial fan flooding should be evaluated and projects should be sited to avoid alluvial fan flooding. Delineation of floodplains and alluvial fan boundaries should attempt to account for future hydrologic changes caused by global climate change.

2A.8 cont.

- PMM LU-1:
  - a) Facilitate good design for land use projects that build upon and improve existing circulation patterns
  - Encourage implementing agencies to orient transportation projects to minimize impacts on existing communities by:
  - Selecting alignments within or adjacent to existing public rights of way.
  - Design sections above or below-grade to maintain viable vehicular, cycling, and pedestrian connections between portions of communities where existing connections are disrupted by the transportation project.
  - Wherever feasible incorporate direct crossings, overcrossings, or under crossings at regular intervals for multiple modes of travel (e.g., pedestrians, bicyclists, vehicles).
  - Where it has been determined that it is infeasible to avoid creating a barrier in an established community, consider other measures to reduce impacts, including but not limited to:
  - Alignment shifts to minimize the area affected.

- Reduction of the proposed right-of-way take to minimize the overall area of impact.
- Provisions for bicycle, pedestrian, and vehicle access across improved roadways.

- PMM LU-2:
  - When an inconsistency with the adopted general plan policy or land use regulation (adopted for the purpose of avoiding or mitigating an impact) is identified modify the transportation or land use project to eliminate the conflict; or, determine if the environmental, social, economic, and engineering benefits of the project warrant an amendment to the general plan or land use regulation.
- PMM MIN-1:
  - Provide for the efficient use of known aggregate and mineral resources or locally important mineral resource recovery sites, by ensuring that the consumptive use of aggregate resources is minimized and that access to recoverable sources of aggregate is not precluded, as a result of construction, operation and maintenance of projects.
  - Where avoidance is infeasible, minimize impacts to the efficient and effective use of recoverable sources of aggregate through measures that have been identified in county and city general plans, or other comparable measures such as:
  - Recycle and reuse building materials resulting from demolition, particularly aggregate resources, to the maximum extent practicable.
  - Identify and use building materials, particularly aggregate materials, resulting from demolition at other construction sites in the SCAG region, or within a reasonable hauling distance of the project site.
  - Design transportation network improvements in a manner (such as buffer zones or the use of screening) that does not preclude

2A.8 cont.

adjacent or nearby extraction of known mineral and aggregate resources following completion of the improvement and during long-term operations.

- Avoid or reduce impacts on known aggregate and mineral resources and mineral resource recovery sites through the evaluation and selection of project sites and design features (e.g., buffers) that minimize impacts on land suitable for aggregate and mineral resource extraction by maintaining portions of MRZ2 areas in open space or other general plan land use categories and zoning that allow for mining of mineral resources.

2A.8 cont.

- PMM NOISE-1:
  - Install temporary noise barriers during construction.
  - Include permanent noise barriers and sound-attenuating features as part of the project design. Barriers could be in the form of outdoor barriers, sound walls, buildings, or earth berms to attenuate noise at adjacent sensitive uses.
  - Schedule construction activities consistent with the allowable hours pursuant to applicable general plan noise element or noise ordinance
  - Post procedures and phone numbers at the construction site for notifying the Lead Agency staff, local Police Department, and construction contractor (during regular construction hours and off-hours), along with permitted construction days and hours, complaint procedures, and who to notify in the event of a problem.
  - Notify neighbors and occupants within 300 feet of the project construction area at least 30 days in advance of anticipated times when noise levels are expected to exceed limits established in the noise element of the general plan or noise ordinance.
  - Designate an on-site construction complaint and enforcement manager for the project.

- Ensure that construction equipment are properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded.

2A.8 cont.

- Use hydraulically or electrically powered tools (e.g., jack hammers, pavement breakers, and rock drills) for project construction to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust should be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves should be used, if such jackets are commercially available, and this could achieve a further reduction of 5 dBA. Quieter procedures should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures.
- Where feasible, design projects so that they are depressed below the grade of the existing noise-sensitive receptor, creating an effective barrier between the roadway and sensitive receptors.
- Where feasible, improve the acoustical insulation of dwelling units where setbacks and sound barriers do not provide sufficient noise reduction.
- Using rubberized asphalt or "quiet pavement" to reduce road noise for new roadway segments, roadways in which widening or other modifications require re-pavement, or normal reconstruction of roadways where re-pavement is planned
- Projects that require pile driving or other construction noise above 90 dBA in proximity to sensitive receptors, should reduce potential pier drilling, pile driving and/or other extreme noise generating construction impacts greater than 90 dBA; a set of site-

specific noise attenuation measures should be completed under the supervision of a qualified acoustical consultant.

- Use land use planning measures, such as zoning, restrictions on development, site design, and buffers to ensure that future development is compatible with adjacent transportation facilities and land uses;
- Monitor the effectiveness of noise reduction measures by taking noise measurements and installing adaptive mitigation measures to achieve the standards for ambient noise levels established by the noise element of the general plan or noise ordinance.
- Use equipment and trucks with the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds, wherever feasible) for project construction.
- Stationary noise sources can and should be located as far from adjacent sensitive receptors as possible and they should be muffled and enclosed within temporary sheds, incorporate insulation barriers, or use other measures as determined by the Lead Agency (or other appropriate government agency) to provide equivalent noise reduction.
- Use of portable barriers in the vicinity of sensitive receptors during construction.
- Implement noise control at the receivers by temporarily improving the noise reduction capability of adjacent buildings (for instance by the use of sound blankets), and implement if such measures are feasible and would noticeably reduce noise impacts.
- Monitor the effectiveness of noise attenuation measures by taking noise measurements.
- Maximize the distance between noise-sensitive land uses and new roadway lanes, roadways, rail lines, transit centers, park-and-ride lots, and other new noise-generating facilities.

2A.8 cont.

- Construct sound reducing barriers between noise sources and noise-sensitive land uses.
- Stationary noise sources can and should be located as far from adjacent sensitive receptors as possible and they should be muffled and enclosed within temporary sheds, incorporate insulation barriers, or use other measures as determined by the Lead Agency (or other appropriate government agency) to provide equivalent noise reduction.
- Use techniques such as grade separation, buffer zones, landscaped berms, dense plantings, sound walls, reduced-noise paving materials, and traffic calming measures.
- Locate transit-related passenger stations, central maintenance facilities, decentralized maintenance facilities, and electric substations away from sensitive receptors to the maximum extent feasible.
- Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities.

2A.8 cont.

- PMM NOISE-2:
  - For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the potential vibration impacts to the structural integrity of the adjacent buildings within 50 feet of pile driving locations.
  - For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the threshold levels of vibration and cracking that could damage adjacent historic or other structure, and design means and construction methods to not exceed the thresholds.
  - For projects where pile driving would be necessary for construction due to geological conditions, utilize quiet pile driving techniques such as predrilling the piles to the maximum feasible

depth, where feasible. Predrilling pile holes will reduce the number of blows required to completely seat the pile and will concentrate the pile driving activity closer to the ground where pile driving noise can be shielded more effectively by a noise barrier/curtain.

- Restrict construction activities to permitted hours in accordance with local jurisdiction regulation.
- Properly maintain construction equipment and outfit construction equipment with the best available noise suppression devices (e.g., mufflers, silences, wraps).
- Prohibit idling of construction equipment for extended periods of time in the vicinity of sensitive receptors.

2A.8 cont.

- PMM POP-1:
  - Evaluate alternate route alignments and transportation facilities that minimize the displacement of homes and businesses. Use an iterative design and impact analysis where impacts to homes or businesses are involved to minimize the potential of impacts on housing and displacement of people.
  - Prioritize the use existing ROWs, wherever feasible.
  - Develop a construction schedule that minimizes potential neighborhood deterioration from protracted waiting periods between right-of-way acquisition and construction.
  - Review capacities of available urban infrastructure and augment capacities as needed to accommodate demand in locations where growth is desirable to the local lead Agency and encouraged by the SCS (primarily TPAs, where applicable).
  - When General Plans and other local land use regulations are amended or updated, use the most recent growth projections and RHNA allocation plan.
- PMM PSP-1:

- Coordinate with emergency response agencies to ensure that there are adequate governmental facilities to maintain acceptable service ratios, response times or other performance objectives for emergency response services and that any required additional construction of buildings is incorporated in to the project description.
- Where current levels of services at the project site are found to be inadequate, provide fair share contributions towards infrastructure improvements, as appropriate and applicable, to mitigate identified CEQA impacts.
- Project sponsors can and should develop traffic control plans for individual projects. Traffic control plans should include information on lane closures and the anticipated flow of traffic during the construction period. The basic objective of each traffic control plan (TCP) is to permit the contractor to work within the public right of way efficiently and effectively while maintaining a safe, uniform flow of traffic. The construction work and the public traveling through the work zone in vehicles, bicycles or as pedestrians must be given equal consideration when developing a traffic control plan.

2A.8 cont.

- PMM PSS-1:
  - Where construction or expansion of school facilities is required to meet public school service ratios, require school district fees, as applicable.
- PMM PSL-1:
  - Where construction or expansion of library facilities is required to meet public library service ratios, require library fees, as appropriate and applicable, to mitigate identified CEQA impacts.
- PMM REC-1:
  - Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, consider increasing the accessibility to

natural areas and lands for outdoor recreation from the proposed project area, in coordination with local and regional open space planning and/or responsible management agencies.

- Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, encourage patterns of urban development and land use which reduce costs on infrastructure and make better use of existing facilities, using strategies such as:
- Increasing the accessibility to natural areas for outdoor recreation
- Utilizing "green" development techniques
- Promoting water-efficient land use and development
- Encouraging multiple uses, such as the joint use of schools
- Including trail systems and trail segments in General Plan recreation standards.

2A.8 cont.

- PMM TRA-1:
  - Transportation demand management (TDM) strategies should be incorporated into individual land use and transportation projects and plans, as part of the planning process. Local agencies should incorporate strategies identified in the Federal Highway Administration's publication: Integrating Demand Management into the Transportation Planning Process: A Desk Reference (August 2012) into the planning process (FHWA 2012). For example, the following strategies may be included to encourage use of transit and non-motorized modes of transportation and reduce vehicle miles traveled on the region's roadways:
  - include TDM mitigation requirements for new developments;
  - incorporate supporting infrastructure for non-motorized modes, such as, bike lanes, secure bike parking, sidewalks, and crosswalks;
  - provide incentives to use alternative modes and reduce driving, such as, universal transit passes, road and parking pricing;

- implement parking management programs, such as parking cash-out, priority parking for carpools and vanpools;
- develop TDM-specific performance measures to evaluate project-specific and system-wide performance;
- incorporate TDM performance measures in the decision-making process for identifying transportation investments;
- implement data collection programs for TDM to determine the effectiveness of certain strategies and to measure success over time; and
- set aside funding for TDM initiatives.
- The increase in per capita VMT on facilities experiencing LOS F represents a significant impact compared to existing conditions. To assess whether implementation of these specific mitigation strategies would result in measurable traffic congestion reductions, implementing actions may need to be further refined within the overall parameters of the proposed Plan and matched to local conditions in any subsequent project-level environmental analysis.

2A.8 cont.

- PMM TRA-2:
  - Prior to construction, project implementation agencies can and should ensure that all necessary local and state road and railroad encroachment permits are obtained. The project implementation agency can and should also comply with all applicable conditions of approval. As deemed necessary by the governing jurisdiction, the road encroachment permits may require the contractor to prepare a traffic control plan in accordance with professional engineering standards prior to construction. Traffic control plans can and should include the following requirements:
  - Identification of all roadway locations where special construction techniques (e.g., directional drilling or night construction) would be used to minimize impacts to traffic flow.

- Development of circulation and detour plans to minimize impacts to local street circulation. This may include the use of signing and flagging to guide vehicles through and/or around the construction zone.
- Scheduling of truck trips outside of peak morning and evening commute hours.
- Limiting of lane closures during peak hours to the extent possible. Usage of haul routes minimizing truck traffic on local roadways to the extent possible.
- Inclusion of detours for bicycles and pedestrians in all areas potentially affected by project construction.
- Installation of traffic control devices as specified in the California Department of Transportation Manual of Traffic Controls for Construction and Maintenance Work Zones.
- Development and implementation of access plans for highly sensitive land uses such as police and fire stations, transit stations, hospitals, and schools. The access plans would be developed with the facility owner or administrator. To minimize disruption of emergency vehicle access, affected jurisdictions can and should be asked to identify detours for emergency vehicles, which will then be posted by the contractor. Notify in advance the facility owner or operator of the timing, location, and duration of construction activities and the locations of detours and lane closures.
- Storage of construction materials only in designated areas.
- Coordination with local transit agencies for temporary relocation of routes or bus stops in work zones, as necessary
- Ensure the rapid repair of transportation infrastructure in the event of an emergency through cooperation among public agencies and by identifying critical infrastructure needs necessary for: a) emergency responders to enter the region, b) evacuation of affected facilities, and c) restoration of utilities.

2A.8 cont.

- Enhance emergency preparedness awareness among public agencies and with the public at large.

- PMM TCR-1:
  - Avoidance and preservation of the resources in place, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria;
  - Treating the resource with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following: protecting the cultural character and integrity of the resource; protecting the traditional use of the resource; and protecting the confidentiality of the resource;
  - Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places; and protecting the resource.
- PMM USSW-2:
  - Integrate green building measures with CALGreen (California Building Code Title 24) into project design, including but not limited to the following:
  - Reuse and minimization of construction and demolition (C&D) debris and diversion of C&D waste from landfills to recycling facilities.
  - Inclusion of a waste management plan that promotes maximum C&D diversion.
  - Source reduction through (1) use of materials that are more durable and easier to repair and maintain, (2) design to generate less scrap material through dimensional planning, (3) increased recycled content, (4) use of reclaimed materials, and (5) use of

2A.8 cont.

structural materials in a dual role as finish material (e.g., stained concrete flooring, unfinished ceilings, etc.).

- Reuse of existing structure and shell in renovation projects.
- Development of indoor recycling program and space.
- Discourage the siting of new landfills unless all other waste reduction and prevention actions have been fully explored. If landfill siting or expansion is necessary, site landfills with an adequate landfill-owned, undeveloped land buffer to minimize the potential adverse impacts of the landfill in neighboring communities.

2A.8 cont.

- Discourage exporting of locally generated waste outside of the SCAG region during the construction and implementation of a project. Encourage disposal within the county where the waste originates as much as possible. Promote green technologies for long-distance transport of waste (e.g., clean engines and clean locomotives or electric rail for waste-by-rail disposal systems) and consistency with SCAQMD and Connect SoCal policies can and should be required.
- Encourage waste reduction goals and practices and look for opportunities for voluntary actions to exceed the 80 percent waste diversion target.
- Encourage the development of local markets for waste prevention, reduction, and recycling practices by supporting recycled content and green procurement policies, as well as other waste prevention, reduction and recycling practices.
- Develop ordinances that promote waste prevention and recycling activities such as: requiring waste prevention and recycling efforts at all large events and venues; implementing recycled content procurement programs; and developing opportunities to divert food waste away from landfills and toward food banks and composting facilities.

- Develop and site composting, recycling, and conversion technology facilities that have minimum environmental and health impacts.
- Integrate reuse and recycling into residential industrial, institutional and commercial projects.
- Provide education and publicity about reducing waste and available recycling services.
- Implement or expand city or county-wide recycling and composting programs for residents and businesses. This could include extending the types of recycling services offered (e.g., to include food and green waste recycling) and providing public education and publicity about recycling services.

2A.8 cont.

- PMM USWW-1:
  - During the design and CEQA review of individual future projects, implementing agencies and projects sponsors shall determine whether sufficient wastewater capacity exists for the proposed projects. There CEQA determinations must ensure that the proposed development can be served by its existing or planned treatment capacity. If adequate capacity does not exist, project sponsors shall coordinate with the relevant service provider to ensure that adequate public services and utilities could accommodate the increased demand, and if not, infrastructure improvements for the appropriate public service or utility shall be identified in each project's CEQA documentation. The relevant public service provider or utility shall be responsible for undertaking project-level review as necessary to provide CEQA clearance for new facilities.
- PMM USWS-1:
  - Reduce exterior consumptive uses of water in public areas, and should promote reductions in private homes and businesses, by shifting to drought-tolerant native landscape plantings, using

weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives.

- Promote the availability of drought-resistant landscaping options and provide information on where these can be purchased. Use of reclaimed water especially in median landscaping and hillside landscaping can and should be implemented where feasible.
- Implement water conservation best practices such as low-flow toilets, water-efficient clothes washers, water system audits, and leak detection and repair.
- For projects located in an area with existing reclaimed water conveyance infrastructure and excess reclaimed water capacity, use reclaimed water for non- potable uses, especially landscape irrigation. For projects in a location planned for future reclaimed water service, projects should install dual plumbing systems in anticipation of future use. Large developments could treat wastewater onsite to tertiary standards and use it for non-potable uses onsite.

2A.8 cont.

- PMM WF-1:
  - Launch fire prevention education for local cities and counties such that local fire agencies, homeowners, as well as commercial and industrial businesses are aware of potential sources of fire ignition and the related procedures to curb or lessen any activities that might initiate fire ignition.
  - Ensure structures in high fire risk areas are built to current state and federal standards which serve to greatly increase the chances the structure will survive a wildfire and also allow for people to shelter-in-place.
  - Improve road access for emergency response and evacuation so people can evacuate safely and timely when necessary.
  - Improve, and educate regarding, local emergency communications and notifications with residents and businesses.

- Enforce defensible space regulations to keep overgrown and unmanaged vegetation, accumulations of trash and other flammable material away from structures.
- Provide public education about wildfire risk and fire prevention measures, and safety procedures and practices to allow for safe evacuation and/or options to shelter-in-place.
- Include external sprinklers with an independent water source to reduce flammability of structures.
- Include local solar power paired with batteries to reduce power flow in electricity lines.
- For developments in high fire-prone areas, have a fire protection plan for residents and businesses.
- Provide fire hazard and fire safety education for homeowners in or near fire hazard areas.
- Developments in fire-prone areas should have fire-resistant feature, such as:
- Ember-resistant vents
- Fire-resistant roofs
- Surrounding defensible space
- Proper maintenance and upkeep of structures and surrounding area

2A.8 cont.

- PMM WF-2:
  - New development or infrastructure activity within very high hazard severity zones or SRAs shall be required to:
  - Submit a fire protection plan including the designation of fire watch staff;
  - Maintain water and other fire suppression equipment designated solely for firefighting on site for any construction and maintenance activities;

- Locate construction and maintenance equipment in designated "safe areas" such that they do not discharge combustible materials; and
- Designate trained fire watch staff during project construction to reduce risk of fire hazards.
- The SCEA fails to incorporate feasible mitigation measures simply on the basis that it did not identify a potentially significant impact. Pub. Res. Code § 21155.2 subd. (a) is unambiguous in stating that transit priority projects must incorporate "**all feasible mitigation measures**, performance standards or criteria set forth in prior environmental impact reports," irrespective of whether the SCEA finds a less than significant impact with mitigation. The SCEA fails to address the feasibility of measures not incorporated into the Project, and thus fails to meet the requirements of Pub. Res. Code § 21155.2.

2A.8 cont.

1. The Project Fails to Demonstrate Consistency with SCAG's RTP/SCS Plans.

The Project's proposed parking development also negatively affects the SCEA's analysis of consistency with the following goals and policies of the RTP/SCS Plans:

- 2016-2040 RTP/SCS[16]
  - Goal 1: Align the plan investments and policies with improving regional economic development and competitiveness.
  - Goal 2: Maximize mobility and accessibility for all people and goods in the region.
  - Goal 3: Ensure travel safety and reliability for all people and goods in the region.
  - Goal 4: Preserve and ensure a sustainable regional transportation system.
  - Goal 5: Maximize the productivity of our transportation system.

2A.9

[16] SCAG 2016-2040 RTP/SCS at pp. 64-65.

- Goal 6: Protect the environment and health of our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking).
- Goal 7: Actively encourage and create incentives for energy efficiency, where possible.
- Goal 8: Encourage land use and growth patterns that facilitate transit and active transportation.
- Goal 9: Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.
- Guiding Policy 1: Transportation investments shall be based on SCAG's adopted regional Performance Indicators.
- Guiding Policy 2: Ensuring safety, adequate maintenance and efficiency of operations on the existing multimodal transportation system should be the highest RTP/ SCS priorities for any incremental funding in the region.
- Guiding Policy 3: RTP/SCS land use and growth strategies in the RTP/SCS will respect local input and advance smart growth initiatives.
- Guiding Policy 4: Transportation demand management (TDM) and active transportation will be focus areas, subject to Policy 1.
- Guiding Policy 5: HOV gap closures that significantly increase transit and rideshare usage will be supported and encouraged, subject to Policy 1.
- Guiding Policy 6: The RTP/SCS will support investments and strategies to reduce non-recurrent congestion and demand for single occupancy vehicle use, by leveraging advanced technologies.
- Guiding Policy 7: The RTP/SCS will encourage transportation investments that result in cleaner air, a better environment, a more efficient transportation system and sustainable outcomes in the long run.

2A.9 cont.

- Guiding Policy 8: Monitoring progress on all aspects of the Plan, including the timely implementation of projects, programs, and strategies, will be an important and integral component of the Plan.

- 2020-2045 RTP/SCS[17]
  - Goal 1: Encourage regional economic prosperity and global competitiveness.
  - Goal 2: Improve mobility, accessibility, reliability, and travel safety for people and goods.
  - Goal 3: Enhance the preservation, security, and resilience of the regional transportation system.
  - Goal 4: Increase person and goods movement and travel choices within the transportation system.
  - Goal 5: Reduce greenhouse gas emissions and improve air quality.
  - Goal 6: Support healthy and equitable communities.
  - Goal 7: Adapt to a changing climate and support an integrated regional development pattern and transportation network.
  - Goal 8: Leverage new transportation technologies and data-driven solutions that result in more efficient travel.
  - Goal 9: Encourage development of diverse housing types in areas that are supported by multiple transportation options.
  - Goal 10: Promote conservation of natural and agricultural lands and restoration of habitats.
  - Guiding Principle 1: Base transportation investments on adopted regional performance indicators and MAP-21/FAST Act regional targets.
  - Guiding Principle 2: Place high priority for transportation funding in the region on projects and programs that improve mobility, accessibility, reliability and safety, and that preserve the existing transportation system.

2A.9 cont.

[17] Connect SoCal, *supra*, at pp. 9-10.

- Guiding Principle 3: Assure that land use and growth strategies recognize local input, promote sustainable transportation options, and support equitable and adaptable communities.
- Guiding Principle 4: Encourage RTP/SCS investments and strategies that collectively result in reduced non-recurrent congestion and demand for single occupancy vehicle use, by leveraging new transportation technologies and expanding travel choices.
- Guiding Principle 5: Encourage transportation investments that will result in improved air quality and public health, and reduced greenhouse gas emissions.
- Guiding Principle 6: Monitor progress on all aspects of the Plan, including the timely implementation of projects, programs, and strategies.
- Guiding Principle 7: Regionally, transportation investments should reflect best-known science regarding climate change vulnerability, in order to design for long term resilience.

2A.9 cont.

The provision of parking well above the level required of a TPP would cut against these goals. The SCEA process should not be used to avoid larger environmental review simply by virtue of proximity to a rail stop. The Project should be revised or should be subject to more robust environmental review.

E. The SCEA Fails to Adequately Assess and Mitigate Impacts on Noise.

If a project has a significant effect on the environment, an agency may approve the project only upon finding that it has "eliminated or substantially lessened all significant effects on the environment where feasible" and that any unavoidable significant effects on the environment are "acceptable due to overriding concerns." CEQA Guidelines, § 15092, subd. (b)(2)(A–B).

2A.10

The SCEA here finds that the construction of the Project would have the potential to result in significant noise impacts at off-site sensitive receptor locations from on-site construction activities via construction equipment. These impacts are particularly detrimental given that the SCEA identifies at least four (4) sensitive receptor locations within 500 feet of the Project Site. Accordingly, the SCEA imposes mitigation measures such as MM NOI-1 which calls for the implementation of noise control

devices, such as mufflers, lagging, and/or motor enclosures capable of reducing construction equipment noise by 10 dBA.

However, the SCEA's mitigation measure is problematic for at least two reasons. First, the assumed elevation (at ground level) of the noise source is not defined. This information is crucial because it is key to the performance of the noise control devices. The Project proposes a 22-story hotel and 23-story mixed-use building. Thus, for example, assuming the noise control device sits on the ground floor at the perimeter of the job site, it would not adequately mitigate noise sources elevated above the ground level as construction of the building progresses. The mitigation measures must be revised to fully explain how the noise control devices would be used to mitigate noise impacts at a minimum of 15 dBA for elevated sources during construction of the two 22- and 23-story buildings. 2A.10 cont.

Further, the SCEA is not clear on where, if at all, noise-control barriers would be placed and whether those would be movable and adjustable to ensure all construction noise is mitigated. Second and likewise, MM NOI-1 addresses only receivers at ground level but does not address elevated receivers. Furthermore, the SCEA does not recognize other nearby buildings, such as, for example, the Goya Studios Sound Stage or the hotel Mama Shelter Los Angeles, which could very well count as sensitive receptors and be impacted by the noise from the Project's construction.

Therefore, the SCEA should be revised and recirculated to account for the foregoing issues and potential construction and operational noise impacts individually and cumulatively with other related projects as defined by CEQA.

IV. THE CITY SHOULD IMPOSE TRAINING REQUIREMENTS FOR THE PROJECT'S CONSTRUCTION ACTIVITIES TO PREVENT COMMUNITY SPREAD OF COVID-19 AND OTHER INFECTIOUS DISEASES.

CEQA requires that an agency make a finding of significance when a Project may cause a significant adverse effect on human beings. Pub. Res. Code, § 21083, subd. (b)(3); CEQA Guidelines, § 15065, subd. (a)(4). 2A.11

Public health risks related to construction work require a mandatory finding of significance under CEQA. Construction work has been defined as a lower- to high-risk activity for COVID-19 spread by the Occupations Safety and Health

Administration. Recently, several construction sites have been identified as sources of community-wide spreads of COVID-19.

WSRCC recommends that the City adopt additional CEQA mitigation measures to mitigate public health risks from the Project's construction activities. WSRCC also requests that the City require safe on-site construction work practices as well as training and certification for any construction workers on the Project site.

In particular, and based upon its experience with safe construction site work practices, WSRCC recommends that the City require that while construction activities are being conducted at the Project Site:

2A.11 cont.

Construction Site Design:

- The Project Site be limited to two controlled entry points.
- Entry points have temperature screening technicians taking temperature readings when the entry point is open.
- The Temperature Screening Site Plan shows details regarding access to the Project Site and Project Site logistics for conducting temperature screening.
- A 48-hour advance notice be provided to all trades prior to the first day of temperature screening.
- The perimeter fence directly adjacent to the entry points be clearly marked indicating the appropriate 6-foot social distancing position for when you approach the screening area. Please reference the Apex temperature screening site map for additional details.
- There be clear signage posted at the project site directing you through temperature screening.
- Provide hand washing stations throughout the construction site.

Testing Procedures:

- The temperature screenings used are non-contact devices.
- Temperature readings are not to be recorded.
- Personnel be screened upon entering the testing center and should only take one to two seconds per individual.

- Hard hats, head coverings, sweat, dirt, sunscreen, or any other cosmetics must be removed on the forehead before temperature screening.
- Anyone who refuses to submit to a temperature screening or does not answer the health screening questions be refused access to the Project Site.
- Screenings be performed at both entrances from 5:30 am to 7:30 am at the main gate and personnel gate.
- After 7:30 am, only the main gate entrance continues to be used for temperature testing for anybody gaining entry to the project site such as returning personnel, deliveries, and visitors.
- If the digital thermometer displays a temperature reading above 100.0 degrees Fahrenheit, a second reading will be taken to verify an accurate reading.
- If the second reading confirms an elevated temperature, DHS will instruct the individual that he/she will not be allowed to enter the Project Site. DHS will also instruct the individual to promptly notify his/her supervisor and human resources representative and provide them with a copy of Annex A.

2A.11 cont.

Planning:

- Require the development of an Infectious Disease Preparedness and Response Plan that will include basic infection prevention measures (requiring the use of personal protection equipment), policies and procedures for prompt identification and isolation of sick individuals, social distancing (prohibiting gatherings of no more than 10 people including all-hands meetings and all-hands lunches) communication and training and workplace controls that meet standards that may be promulgated by the Center for Disease Control, Occupational Safety and Health Administration, Cal/OSHA, California Department of Public Health or applicable local public health agencies.

The United Brotherhood of Carpenters and Carpenters International Training Fund has developed COVID-19 Training and Certification to ensure that Carpenter union members and apprentices conduct safe work practices. The City should require that all construction workers undergo COVID-19 Training and Certification before being allowed to conduct construction activities at the Project Site.

WSRCC has also developed a rigorous Infection Control Risk Assessment (**ICRA**)

training program to ensure it delivers a workforce that understands how to identify and control infection risks by implementing protocols to protect themselves and all others during renovation and construction projects in healthcare environments. The ICRA protocols are intended to contain pathogens, control airflow, and protect patients during the construction, maintenance, and renovation of healthcare facilities. These protocols prevent cross-contamination, minimizing the risk of secondary infections in patients at hospital facilities. The City should require that the Project be built using a workforce trained in ICRA protocols. 2A.11 cont.

V. CONCLUSION.

In light of the aforementioned concerns, WSRCC respectfully requests that the City: (1) require a local and skilled workforce for the Project; (2) commission the preparation and circulation of a Project-specific Environmental Impact Report with a thorough analysis of the Project's cumulative impacts considering the several high-rise developments in the South Park neighborhood that have recently been planned, proposed, built, or approved; and, (3) order Applicant to revise the Project to ensure its consistency with all applicable laws and regulations. Should the City have any questions or concerns, it should feel free to contact my office. 2A.12

Sincerely,

Reza Bonachea Mohamadzadeh
Attorney for Western States
Regional Council of Carpenters

Attached:

March 8, 2021, SWAPE Letter to Mitchell M. Tsai re Local Hire Requirements and Considerations for Greenhouse Gas Modeling (Exhibit A);

Air Quality and GHG Expert Paul Rosenfeld CV (Exhibit B);

Air Quality and GHG Expert Matt Hagemann CV (Exhibit C);

HI Point Neighbors' Association v. City of Los Angeles Ruling (Exhibit D).

EXHIBIT A

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

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March 8, 2021

Mitchell M. Tsai
155 South El Molino, Suite 104
Pasadena, CA 91101

Subject: Local Hire Requirements and Considerations for Greenhouse Gas Modeling

Dear Mr. Tsai,

Soil Water Air Protection Enterprise ("SWAPE") is pleased to provide the following draft technical report explaining the significance of worker trips required for construction of land use development projects with respect to the estimation of greenhouse gas ("GHG") emissions. The report will also discuss the potential for local hire requirements to reduce the length of worker trips, and consequently, reduced or mitigate the potential GHG impacts.

Worker Trips and Greenhouse Gas Calculations

The California Emissions Estimator Model ("CalEEMod") is a "statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and greenhouse gas (GHG) emissions associated with both construction and operations from a variety of land use projects."[1] CalEEMod quantifies construction-related emissions associated with land use projects resulting from off-road construction equipment; on-road mobile equipment associated with workers, vendors, and hauling; fugitive dust associated with grading, demolition, truck loading, and on-road vehicles traveling along paved and unpaved roads; and architectural coating activities; and paving.[2]

The number, length, and vehicle class of worker trips are utilized by CalEEMod to calculate emissions associated with the on-road vehicle trips required to transport workers to and from the Project site during construction.[3]

[1] "California Emissions Estimator Model." CAPCOA, 2017, *available at:* http://www.aqmd.gov/caleemod/home.
[2] "California Emissions Estimator Model." CAPCOA, 2017, *available at:* http://www.aqmd.gov/caleemod/home.
[3] "CalEEMod User's Guide." CAPCOA, November 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 34.

Specifically, the number and length of vehicle trips is utilized to estimate the vehicle miles travelled ("VMT") associated with construction. Then, utilizing vehicle-class specific EMFAC 2014 emission factors, CalEEMod calculates the vehicle exhaust, evaporative, and dust emissions resulting from construction-related VMT, including personal vehicles for worker commuting.[4]

Specifically, in order to calculate VMT, CalEEMod multiplies the average daily trip rate by the average overall trip length (see excerpt below):

> "$VMT_d = \Sigma(\text{Average Daily Trip Rate}_i * \text{Average Overall Trip Length}_i)_n$
>
> Where:
>
> n = Number of land uses being modeled."[5]

Furthermore, to calculate the on-road emissions associated with worker trips, CalEEMod utilizes the following equation (see excerpt below):

> "$\text{Emissions}_{pollutant} = VMT * EF_{running,pollutant}$
>
> Where:
>
> $\text{Emissions}_{pollutant}$ = emissions from vehicle running for each pollutant
>
> VMT = vehicle miles traveled
>
> $EF_{running,pollutant}$ = emission factor for running emissions."[6]

Thus, there is a direct relationship between trip length and VMT, as well as a direct relationship between VMT and vehicle running emissions. In other words, when the trip length is increased, the VMT and vehicle running emissions increase as a result. Thus, vehicle running emissions can be reduced by decreasing the average overall trip length, by way of a local hire requirement or otherwise.

Default Worker Trip Parameters and Potential Local Hire Requirements

As previously discussed, the number, length, and vehicle class of worker trips are utilized by CalEEMod to calculate emissions associated with the on-road vehicle trips required to transport workers to and from the Project site during construction.[7] In order to understand how local hire requirements and associated worker trip length reductions impact GHG emissions calculations, it is important to consider the CalEEMod default worker trip parameters. CalEEMod provides recommended default values based on site-specific information, such as land use type, meteorological data, total lot acreage, project type and typical equipment associated with project type. If more specific project information is known, the user can change the default values and input project-specific values, but the California Environmental Quality Act ("CEQA") requires that such changes be justified by substantial evidence.[8] The default number of construction-related worker trips is calculated by multiplying the

[4] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 14-15.
[5] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 23.
[6] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 15.
[7] "CalEEMod User's Guide." CAPCOA, November 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 34.
[8] CalEEMod User Guide, *available at:* http://www.caleemod.com/, p. 1, 9.

number of pieces of equipment for all phases by 1.25, with the exception of worker trips required for the building construction and architectural coating phases.[9] Furthermore, the worker trip vehicle class is a 50/25/25 percent mix of light duty autos, light duty truck class 1 and light duty truck class 2, respectively."[10] Finally, the default worker trip length is consistent with the length of the operational home-to-work vehicle trips.[11] The operational home-to-work vehicle trip lengths are:

> "[B]ased on the *location* and *urbanization* selected on the project characteristic screen. These values were *supplied by the air districts or use a default average for the state*. Each district (or county) also assigns trip lengths for urban and rural settings" (emphasis added). [12]

Thus, the default worker trip length is based on the location and urbanization level selected by the User when modeling emissions. The below table shows the CalEEMod default rural and urban worker trip lengths by air basin (see excerpt below and Attachment A).[13]

Worker Trip Length by Air Basin		
Air Basin	**Rural (miles)**	**Urban (miles)**
Great Basin Valleys	16.8	10.8
Lake County	16.8	10.8
Lake Tahoe	16.8	10.8
Mojave Desert	16.8	10.8
Mountain Counties	16.8	10.8
North Central Coast	17.1	12.3
North Coast	16.8	10.8
Northeast Plateau	16.8	10.8
Sacramento Valley	16.8	10.8
Salton Sea	14.6	11
San Diego	16.8	10.8
San Francisco Bay Area	10.8	10.8
San Joaquin Valley	16.8	10.8
South Central Coast	16.8	10.8
South Coast	19.8	14.7
Average	**16.47**	**11.17**
Minimum	**10.80**	**10.80**
Maximum	**19.80**	**14.70**
Range	**9.00**	**3.90**

[9] "CalEEMod User's Guide." CAPCOA, November 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 34.
[10] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 15.
[11] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 14.
[12] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 21.
[13] "Appendix D Default Data Tables." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/05_appendix-d2016-3-2.pdf?sfvrsn=4, p. D-84 – D-86.

As demonstrated above, default rural worker trip lengths for air basins in California vary from 10.8- to 19.8-miles, with an average of 16.47 miles. Furthermore, default urban worker trip lengths vary from 10.8- to 14.7-miles, with an average of 11.17 miles. Thus, while default worker trip lengths vary by location, default urban worker trip lengths tend to be shorter in length. Based on these trends evident in the CalEEMod default worker trip lengths, we can reasonably assume that the efficacy of a local hire requirement is especially dependent upon the urbanization of the project site, as well as the project location.

Practical Application of a Local Hire Requirement and Associated Impact

To provide an example of the potential impact of a local hire provision on construction-related GHG emissions, we estimated the significance of a local hire provision for the Village South Specific Plan ("Project") located in the City of Claremont ("City"). The Project proposed to construct 1,000 residential units, 100,000-SF of retail space, 45,000-SF of office space, as well as a 50-room hotel, on the 24-acre site. The Project location is classified as Urban and lies within the Los Angeles-South Coast County. As a result, the Project has a default worker trip length of 14.7 miles.[14] In an effort to evaluate the potential for a local hire provision to reduce the Project's construction-related GHG emissions, we prepared an updated model, reducing all worker trip lengths to 10 miles (see Attachment B). Our analysis estimates that if a local hire provision with a 10-mile radius were to be implemented, the GHG emissions associated with Project construction would decrease by approximately 17% (see table below and Attachment C).

Local Hire Provision Net Change	
Without Local Hire Provision	
Total Construction GHG Emissions (MT CO_2e)	3,623
Amortized Construction GHG Emissions (MT CO_2e/year)	120.77
With Local Hire Provision	
Total Construction GHG Emissions (MT CO2e)	3,024
Amortized Construction GHG Emissions (MT CO_2e/year)	100.80
% Decrease in Construction-related GHG Emissions	***17%***

As demonstrated above, by implementing a local hire provision requiring 10 mile worker trip lengths, the Project could reduce potential GHG emissions associated with construction worker trips. More broadly, any local hire requirement that results in a decreased worker trip length from the default value has the potential to result in a reduction of construction-related GHG emissions, though the significance of the reduction would vary based on the location and urbanization level of the project site.

This serves as an example of the potential impacts of local hire requirements on estimated project-level GHG emissions, though it does not indicate that local hire requirements would result in reduced construction-related GHG emission for all projects. As previously described, the significance of a local hire requirement depends on the worker trip length enforced and the default worker trip length for the project's urbanization level and location.

[14] "Appendix D Default Data Tables." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/05_appendix-d2016-3-2.pdf?sfvrsn=4, p. D-85.

Disclaimer

SWAPE has received limited discovery. Additional information may become available in the future; thus, we retain the right to revise or amend this report when additional information becomes available. Our professional services have been performed using that degree of care and skill ordinarily exercised, under similar circumstances, by reputable environmental consultants practicing in this or similar localities at the time of service. No other warranty, expressed or implied, is made as to the scope of work, work methodologies and protocols, site conditions, analytical testing results, and findings presented. This report reflects efforts which were limited to information that was reasonably accessible at the time of the work, and may contain informational gaps, inconsistencies, or otherwise be incomplete due to the unavailability or uncertainty of information obtained or provided by third parties.

Sincerely,

Matt Hagemann, P.G., C.Hg.

Paul E. Rosenfeld, Ph.D.

Location Type	Location Name	Rural H-W (miles)	Urban H-W (miles)
Air Basin	Great Basin	16.8	10.8
Air Basin	Lake County	16.8	10.8
Air Basin	Lake Tahoe	16.8	10.8
Air Basin	Mojave Desert	16.8	10.8
Air Basin	Mountain	16.8	10.8
Air Basin	North Central	17.1	12.3
Air Basin	North Coast	16.8	10.8
Air Basin	Northeast	16.8	10.8
Air Basin	Sacramento	16.8	10.8
Air Basin	Salton Sea	14.6	11
Air Basin	San Diego	16.8	10.8
Air Basin	San Francisco	10.8	10.8
Air Basin	San Joaquin	16.8	10.8
Air Basin	South Central	16.8	10.8
Air Basin	South Coast	19.8	14.7
Air District	Amador County	16.8	10.8
Air District	Antelope Valley	16.8	10.8
Air District	Bay Area AQMD	10.8	10.8
Air District	Butte County	12.54	12.54
Air District	Calaveras	16.8	10.8
Air District	Colusa County	16.8	10.8
Air District	El Dorado	16.8	10.8
Air District	Feather River	16.8	10.8
Air District	Glenn County	16.8	10.8
Air District	Great Basin	16.8	10.8
Air District	Imperial County	10.2	7.3
Air District	Kern County	16.8	10.8
Air District	Lake County	16.8	10.8
Air District	Lassen County	16.8	10.8
Air District	Mariposa	16.8	10.8
Air District	Mendocino	16.8	10.8
Air District	Modoc County	16.8	10.8
Air District	Mojave Desert	16.8	10.8
Air District	Monterey Bay	16.8	10.8
Air District	North Coast	16.8	10.8
Air District	Northern Sierra	16.8	10.8
Air District	Northern	16.8	10.8
Air District	Placer County	16.8	10.8
Air District	Sacramento	15	10

Air District	San Diego	16.8	10.8
Air District	San Joaquin	16.8	10.8
Air District	San Luis Obispo	13	13
Air District	Santa Barbara	8.3	8.3
Air District	Shasta County	16.8	10.8
Air District	Siskiyou County	16.8	10.8
Air District	South Coast	19.8	14.7
Air District	Tehama County	16.8	10.8
Air District	Tuolumne	16.8	10.8
Air District	Ventura County	16.8	10.8
Air District	Yolo/Solano	15	10
County	Alameda	10.8	10.8
County	Alpine	16.8	10.8
County	Amador	16.8	10.8
County	Butte	12.54	12.54
County	Calaveras	16.8	10.8
County	Colusa	16.8	10.8
County	Contra Costa	10.8	10.8
County	Del Norte	16.8	10.8
County	El Dorado-Lake	16.8	10.8
County	El Dorado-	16.8	10.8
County	Fresno	16.8	10.8
County	Glenn	16.8	10.8
County	Humboldt	16.8	10.8
County	Imperial	10.2	7.3
County	Inyo	16.8	10.8
County	Kern-Mojave	16.8	10.8
County	Kern-San	16.8	10.8
County	Kings	16.8	10.8
County	Lake	16.8	10.8
County	Lassen	16.8	10.8
County	Los Angeles-	16.8	10.8
County	Los Angeles-	19.8	14.7
County	Madera	16.8	10.8
County	Marin	10.8	10.8
County	Mariposa	16.8	10.8
County	Mendocino-	16.8	10.8
County	Mendocino-	16.8	10.8
County	Mendocino-	16.8	10.8
County	Mendocino-	16.8	10.8
County	Merced	16.8	10.8
County	Modoc	16.8	10.8
County	Mono	16.8	10.8
County	Monterey	16.8	10.8
County	Napa	10.8	10.8

County	Nevada	16.8	10.8
County	Orange	19.8	14.7
County	Placer-Lake	16.8	10.8
County	Placer-Mountain	16.8	10.8
County	Placer-	16.8	10.8
County	Plumas	16.8	10.8
County	Riverside-	16.8	10.8
County	Riverside-	19.8	14.7
County	Riverside-Salton	14.6	11
County	Riverside-South	19.8	14.7
County	Sacramento	15	10
County	San Benito	16.8	10.8
County	San Bernardino-	16.8	10.8
County	San Bernardino-	19.8	14.7
County	San Diego	16.8	10.8
County	San Francisco	10.8	10.8
County	San Joaquin	16.8	10.8
County	San Luis Obispo	13	13
County	San Mateo	10.8	10.8
County	Santa Barbara-	8.3	8.3
County	Santa Barbara-	8.3	8.3
County	Santa Clara	10.8	10.8
County	Santa Cruz	16.8	10.8
County	Shasta	16.8	10.8
County	Sierra	16.8	10.8
County	Siskiyou	16.8	10.8
County	Solano-	15	10
County	Solano-San	16.8	10.8
County	Sonoma-North	16.8	10.8
County	Sonoma-San	10.8	10.8
County	Stanislaus	16.8	10.8
County	Sutter	16.8	10.8
County	Tehama	16.8	10.8
County	Trinity	16.8	10.8
County	Tulare	16.8	10.8
County	Tuolumne	16.8	10.8
County	Ventura	16.8	10.8
County	Yolo	15	10
County	Yuba	16.8	10.8
Statewide	Statewide	16.8	10.8

Worker Trip Length by Air Basin		
Air Basin	**Rural (miles)**	**Urban (miles)**
Great Basin Valleys	16.8	10.8
Lake County	16.8	10.8
Lake Tahoe	16.8	10.8
Mojave Desert	16.8	10.8
Mountain Counties	16.8	10.8
North Central Coast	17.1	12.3
North Coast	16.8	10.8
Northeast Plateau	16.8	10.8
Sacramento Valley	16.8	10.8
Salton Sea	14.6	11
San Diego	16.8	10.8
San Francisco Bay Area	10.8	10.8
San Joaquin Valley	16.8	10.8
South Central Coast	16.8	10.8
South Coast	19.8	14.7
Average	**16.47**	**11.17**
Mininum	**10.80**	**10.80**
Maximum	**19.80**	**14.70**
Range	**9.00**	**3.90**

Village South Specific Plan (Proposed)

Los Angeles-South Coast County, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Office Building	45.00	1000sqft	1.03	45,000.00	0
High Turnover (Sit Down Restaurant)	36.00	1000sqft	0.83	36,000.00	0
Hotel	50.00	Room	1.67	72,600.00	0
Quality Restaurant	8.00	1000sqft	0.18	8,000.00	0
Apartments Low Rise	25.00	Dwelling Unit	1.56	25,000.00	72
Apartments Mid Rise	975.00	Dwelling Unit	25.66	975,000.00	2789
Regional Shopping Center	56.00	1000sqft	1.29	56,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	33
Climate Zone	9			**Operational Year**	2028
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	702.44	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

Project Characteristics - Consistent with the DEIR's model.

Land Use - See SWAPE comment regarding residential and retail land uses.

Construction Phase - See SWAPE comment regarding individual construction phase lengths.

Demolition - Consistent with the DEIR's model. See SWAPE comment regarding demolition.

Vehicle Trips - Saturday trips consistent with the DEIR's model. See SWAPE comment regarding weekday and Sunday trips.

Woodstoves - Woodstoves and wood-burning fireplaces consistent with the DEIR's model. See SWAPE comment regarding gas fireplaces.

Energy Use -

Construction Off-road Equipment Mitigation - See SWAPE comment on construction-related mitigation.

Area Mitigation - See SWAPE comment regarding operational mitigation measures.

Water Mitigation - See SWAPE comment regarding operational mitigation measures.

Table Name	Column Name	Default Value	New Value
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	NumberWood	1.25	0.00
tblFireplaces	NumberWood	48.75	0.00
tblVehicleTrips	ST_TR	7.16	6.17
tblVehicleTrips	ST_TR	6.39	3.87
tblVehicleTrips	ST_TR	2.46	1.39
tblVehicleTrips	ST_TR	158.37	79.82
tblVehicleTrips	ST_TR	8.19	3.75
tblVehicleTrips	ST_TR	94.36	63.99
tblVehicleTrips	ST_TR	49.97	10.74
tblVehicleTrips	SU_TR	6.07	6.16
tblVehicleTrips	SU_TR	5.86	4.18
tblVehicleTrips	SU_TR	1.05	0.69
tblVehicleTrips	SU_TR	131.84	78.27

tblVehicleTrips	SU_TR	5.95	3.20
tblVehicleTrips	SU_TR	72.16	57.65
tblVehicleTrips	SU_TR	25.24	6.39
tblVehicleTrips	WD_TR	6.59	5.83
tblVehicleTrips	WD_TR	6.65	4.13
tblVehicleTrips	WD_TR	11.03	6.41
tblVehicleTrips	WD_TR	127.15	65.80
tblVehicleTrips	WD_TR	8.17	3.84
tblVehicleTrips	WD_TR	89.95	62.64
tblVehicleTrips	WD_TR	42.70	9.43
tblWoodstoves	NumberCatalytic	1.25	0.00
tblWoodstoves	NumberCatalytic	48.75	0.00
tblWoodstoves	NumberNoncatalytic	1.25	0.00
tblWoodstoves	NumberNoncatalytic	48.75	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00

2.0 Emissions Summary

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2021	0.1713	1.8242	1.1662	2.4000e-003	0.4169	0.0817	0.4986	0.1795	0.0754	0.2549	0.0000	213.1969	213.1969	0.0601	0.0000	214.6993
2022	0.6904	4.1142	6.1625	0.0189	1.3058	0.1201	1.4259	0.3460	0.1128	0.4588	0.0000	1,721.6826	1,721.6826	0.1294	0.0000	1,724.9187
2023	0.6148	3.3649	5.6747	0.0178	1.1963	0.0996	1.2959	0.3203	0.0935	0.4138	0.0000	1,627.5295	1,627.5295	0.1185	0.0000	1,630.4925
2024	4.1619	0.1335	0.2810	5.9000e-004	0.0325	6.4700e-003	0.0390	8.6300e-003	6.0400e-003	0.0147	0.0000	52.9078	52.9078	8.0200e-003	0.0000	53.1082
Maximum	**4.1619**	**4.1142**	**6.1625**	**0.0189**	**1.3058**	**0.1201**	**1.4259**	**0.3460**	**0.1128**	**0.4588**	**0.0000**	**1,721.6826**	**1,721.6826**	**0.1294**	**0.0000**	**1,724.9187**

2.1 Overall Construction

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2021	0.1713	1.8242	1.1662	2.4000e-003	0.4169	0.0817	0.4986	0.1795	0.0754	0.2549	0.0000	213.1967	213.1967	0.0601	0.0000	214.6991
2022	0.6904	4.1142	6.1625	0.0189	1.3058	0.1201	1.4259	0.3460	0.1128	0.4588	0.0000	1,721.6823	1,721.6823	0.1294	0.0000	1,724.9183
2023	0.6148	3.3648	5.6747	0.0178	1.1963	0.0996	1.2959	0.3203	0.0935	0.4138	0.0000	1,627.5291	1,627.5291	0.1185	0.0000	1,630.4921
2024	4.1619	0.1335	0.2810	5.9000e-004	0.0325	6.4700e-003	0.0390	8.6300e-003	6.0400e-003	0.0147	0.0000	52.9077	52.9077	8.0200e-003	0.0000	53.1082
Maximum	**4.1619**	**4.1142**	**6.1625**	**0.0189**	**1.3058**	**0.1201**	**1.4259**	**0.3460**	**0.1128**	**0.4588**	**0.0000**	**1,721.6823**	**1,721.6823**	**0.1294**	**0.0000**	**1,724.9183**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	**9-1-2021**	**11-30-2021**	1.4103	1.4103
2	**12-1-2021**	**2-28-2022**	1.3613	1.3613
3	**3-1-2022**	**5-31-2022**	1.1985	1.1985
4	**6-1-2022**	**8-31-2022**	1.1921	1.1921
5	**9-1-2022**	**11-30-2022**	1.1918	1.1918
6	**12-1-2022**	**2-28-2023**	1.0774	1.0774
7	**3-1-2023**	**5-31-2023**	1.0320	1.0320
8	**6-1-2023**	**8-31-2023**	1.0260	1.0260

9	**9-1-2023**	**11-30-2023**	1.0265	1.0265
10	**12-1-2023**	**2-29-2024**	2.8857	2.8857
11	**3-1-2024**	**5-31-2024**	1.6207	1.6207
		Highest	2.8857	2.8857

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	5.1437	0.2950	10.3804	1.6700e-003		0.0714	0.0714		0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835
Energy	0.1398	1.2312	0.7770	7.6200e-003		0.0966	0.0966		0.0966	0.0966	0.0000	3,896.0732	3,896.0732	0.1303	0.0468	3,913.2833
Mobile	1.5857	7.9962	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620.4986	7,620.4986	0.3407	0.0000	7,629.0162
Waste						0.0000	0.0000		0.0000	0.0000	207.8079	0.0000	207.8079	12.2811	0.0000	514.8354
Water						0.0000	0.0000		0.0000	0.0000	29.1632	556.6420	585.8052	3.0183	0.0755	683.7567
Total	**6.8692**	**9.5223**	**30.3407**	**0.0914**	**7.7979**	**0.2260**	**8.0240**	**2.0895**	**0.2219**	**2.3114**	**236.9712**	**12,294.1807**	**12,531.1519**	**15.7904**	**0.1260**	**12,963.4751**

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	5.1437	0.2950	10.3804	1.6700e-003		0.0714	0.0714		0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835
Energy	0.1398	1.2312	0.7770	7.6200e-003		0.0966	0.0966		0.0966	0.0966	0.0000	3,896.0732	3,896.0732	0.1303	0.0468	3,913.2833
Mobile	1.5857	7.9962	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620.4986	7,620.4986	0.3407	0.0000	7,629.0162
Waste						0.0000	0.0000		0.0000	0.0000	207.8079	0.0000	207.8079	12.2811	0.0000	514.8354
Water						0.0000	0.0000		0.0000	0.0000	29.1632	556.6420	585.8052	3.0183	0.0755	683.7567
Total	**6.8692**	**9.5223**	**30.3407**	**0.0914**	**7.7979**	**0.2260**	**8.0240**	**2.0895**	**0.2219**	**2.3114**	**236.9712**	**12,294.1807**	**12,531.1519**	**15.7904**	**0.1260**	**12,963.4751**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	9/1/2021	10/12/2021	5	30	
2	Site Preparation	Site Preparation	10/13/2021	11/9/2021	5	20	
3	Grading	Grading	11/10/2021	1/11/2022	5	45	
4	Building Construction	Building Construction	1/12/2022	12/12/2023	5	500	
5	Paving	Paving	12/13/2023	1/30/2024	5	35	
6	Architectural Coating	Architectural Coating	1/31/2024	3/19/2024	5	35	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 112.5

Acres of Paving: 0

Residential Indoor: 2,025,000; Residential Outdoor: 675,000; Non-Residential Indoor: 326,400; Non-Residential Outdoor: 108,800; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	458.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	7	18.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	801.00	143.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	160.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0496	0.0000	0.0496	7.5100e-003	0.0000	7.5100e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0475	0.4716	0.3235	5.8000e-004		0.0233	0.0233		0.0216	0.0216	0.0000	51.0012	51.0012	0.0144	0.0000	51.3601
Total	**0.0475**	**0.4716**	**0.3235**	**5.8000e-004**	**0.0496**	**0.0233**	**0.0729**	**7.5100e-003**	**0.0216**	**0.0291**	**0.0000**	**51.0012**	**51.0012**	**0.0144**	**0.0000**	**51.3601**

3.2 Demolition - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	1.9300e-003	0.0634	0.0148	1.8000e-004	3.9400e-003	1.9000e-004	4.1300e-003	1.0800e-003	1.8000e-004	1.2600e-003	0.0000	17.4566	17.4566	1.2100e-003	0.0000	17.4869
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	9.7000e-004	7.5000e-004	8.5100e-003	2.0000e-005	2.4700e-003	2.0000e-005	2.4900e-003	6.5000e-004	2.0000e-005	6.7000e-004	0.0000	2.2251	2.2251	7.0000e-005	0.0000	2.2267
Total	**2.9000e-003**	**0.0641**	**0.0233**	**2.0000e-004**	**6.4100e-003**	**2.1000e-004**	**6.6200e-003**	**1.7300e-003**	**2.0000e-004**	**1.9300e-003**	**0.0000**	**19.6816**	**19.6816**	**1.2800e-003**	**0.0000**	**19.7136**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0496	0.0000	0.0496	7.5100e-003	0.0000	7.5100e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0475	0.4716	0.3235	5.8000e-004		0.0233	0.0233		0.0216	0.0216	0.0000	51.0011	51.0011	0.0144	0.0000	51.3600
Total	**0.0475**	**0.4716**	**0.3235**	**5.8000e-004**	**0.0496**	**0.0233**	**0.0729**	**7.5100e-003**	**0.0216**	**0.0291**	**0.0000**	**51.0011**	**51.0011**	**0.0144**	**0.0000**	**51.3600**

3.2 Demolition - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	1.9300e-003	0.0634	0.0148	1.8000e-004	3.9400e-003	1.9000e-004	4.1300e-003	1.0800e-003	1.8000e-004	1.2600e-003	0.0000	17.4566	17.4566	1.2100e-003	0.0000	17.4869
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	9.7000e-004	7.5000e-004	8.5100e-003	2.0000e-005	2.4700e-003	2.0000e-005	2.4900e-003	6.5000e-004	2.0000e-005	6.7000e-004	0.0000	2.2251	2.2251	7.0000e-005	0.0000	2.2267
Total	**2.9000e-003**	**0.0641**	**0.0233**	**2.0000e-004**	**6.4100e-003**	**2.1000e-004**	**6.6200e-003**	**1.7300e-003**	**2.0000e-004**	**1.9300e-003**	**0.0000**	**19.6816**	**19.6816**	**1.2800e-003**	**0.0000**	**19.7136**

3.3 Site Preparation - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1807	0.0000	0.1807	0.0993	0.0000	0.0993	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0389	0.4050	0.2115	3.8000e-004		0.0204	0.0204		0.0188	0.0188	0.0000	33.4357	33.4357	0.0108	0.0000	33.7061
Total	**0.0389**	**0.4050**	**0.2115**	**3.8000e-004**	**0.1807**	**0.0204**	**0.2011**	**0.0993**	**0.0188**	**0.1181**	**0.0000**	**33.4357**	**33.4357**	**0.0108**	**0.0000**	**33.7061**

3.3 Site Preparation - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	7.7000e-004	6.0000e-004	6.8100e-003	2.0000e-005	1.9700e-003	2.0000e-005	1.9900e-003	5.2000e-004	1.0000e-005	5.4000e-004	0.0000	1.7801	1.7801	5.0000e-005	0.0000	1.7814
Total	**7.7000e-004**	**6.0000e-004**	**6.8100e-003**	**2.0000e-005**	**1.9700e-003**	**2.0000e-005**	**1.9900e-003**	**5.2000e-004**	**1.0000e-005**	**5.4000e-004**	**0.0000**	**1.7801**	**1.7801**	**5.0000e-005**	**0.0000**	**1.7814**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1807	0.0000	0.1807	0.0993	0.0000	0.0993	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0389	0.4050	0.2115	3.8000e-004		0.0204	0.0204		0.0188	0.0188	0.0000	33.4357	33.4357	0.0108	0.0000	33.7060
Total	**0.0389**	**0.4050**	**0.2115**	**3.8000e-004**	**0.1807**	**0.0204**	**0.2011**	**0.0993**	**0.0188**	**0.1181**	**0.0000**	**33.4357**	**33.4357**	**0.0108**	**0.0000**	**33.7060**

3.3 Site Preparation - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	7.7000e-004	6.0000e-004	6.8100e-003	2.0000e-005	1.9700e-003	2.0000e-005	1.9900e-003	5.2000e-004	1.0000e-005	5.4000e-004	0.0000	1.7801	1.7801	5.0000e-005	0.0000	1.7814
Total	**7.7000e-004**	**6.0000e-004**	**6.8100e-003**	**2.0000e-005**	**1.9700e-003**	**2.0000e-005**	**1.9900e-003**	**5.2000e-004**	**1.0000e-005**	**5.4000e-004**	**0.0000**	**1.7801**	**1.7801**	**5.0000e-005**	**0.0000**	**1.7814**

3.4 Grading - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1741	0.0000	0.1741	0.0693	0.0000	0.0693	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0796	0.8816	0.5867	1.1800e-003		0.0377	0.0377		0.0347	0.0347	0.0000	103.5405	103.5405	0.0335	0.0000	104.3776
Total	**0.0796**	**0.8816**	**0.5867**	**1.1800e-003**	**0.1741**	**0.0377**	**0.2118**	**0.0693**	**0.0347**	**0.1040**	**0.0000**	**103.5405**	**103.5405**	**0.0335**	**0.0000**	**104.3776**

3.4 Grading - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.6400e-003	1.2700e-003	0.0144	4.0000e-005	4.1600e-003	3.0000e-005	4.2000e-003	1.1100e-003	3.0000e-005	1.1400e-003	0.0000	3.7579	3.7579	1.1000e-004	0.0000	3.7607
Total	**1.6400e-003**	**1.2700e-003**	**0.0144**	**4.0000e-005**	**4.1600e-003**	**3.0000e-005**	**4.2000e-003**	**1.1100e-003**	**3.0000e-005**	**1.1400e-003**	**0.0000**	**3.7579**	**3.7579**	**1.1000e-004**	**0.0000**	**3.7607**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1741	0.0000	0.1741	0.0693	0.0000	0.0693	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0796	0.8816	0.5867	1.1800e-003		0.0377	0.0377		0.0347	0.0347	0.0000	103.5403	103.5403	0.0335	0.0000	104.3775
Total	**0.0796**	**0.8816**	**0.5867**	**1.1800e-003**	**0.1741**	**0.0377**	**0.2118**	**0.0693**	**0.0347**	**0.1040**	**0.0000**	**103.5403**	**103.5403**	**0.0335**	**0.0000**	**104.3775**

3.4 Grading - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.6400e-003	1.2700e-003	0.0144	4.0000e-005	4.1600e-003	3.0000e-005	4.2000e-003	1.1100e-003	3.0000e-005	1.1400e-003	0.0000	3.7579	3.7579	1.1000e-004	0.0000	3.7607
Total	**1.6400e-003**	**1.2700e-003**	**0.0144**	**4.0000e-005**	**4.1600e-003**	**3.0000e-005**	**4.2000e-003**	**1.1100e-003**	**3.0000e-005**	**1.1400e-003**	**0.0000**	**3.7579**	**3.7579**	**1.1000e-004**	**0.0000**	**3.7607**

3.4 Grading - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0807	0.0000	0.0807	0.0180	0.0000	0.0180	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0127	0.1360	0.1017	2.2000e-004		5.7200e-003	5.7200e-003		5.2600e-003	5.2600e-003	0.0000	19.0871	19.0871	6.1700e-003	0.0000	19.2414
Total	**0.0127**	**0.1360**	**0.1017**	**2.2000e-004**	**0.0807**	**5.7200e-003**	**0.0865**	**0.0180**	**5.2600e-003**	**0.0233**	**0.0000**	**19.0871**	**19.0871**	**6.1700e-003**	**0.0000**	**19.2414**

3.4 Grading - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.8000e-004	2.1000e-004	2.4400e-003	1.0000e-005	7.7000e-004	1.0000e-005	7.7000e-004	2.0000e-004	1.0000e-005	2.1000e-004	0.0000	0.6679	0.6679	2.0000e-005	0.0000	0.6684
Total	**2.8000e-004**	**2.1000e-004**	**2.4400e-003**	**1.0000e-005**	**7.7000e-004**	**1.0000e-005**	**7.7000e-004**	**2.0000e-004**	**1.0000e-005**	**2.1000e-004**	**0.0000**	**0.6679**	**0.6679**	**2.0000e-005**	**0.0000**	**0.6684**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0807	0.0000	0.0807	0.0180	0.0000	0.0180	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0127	0.1360	0.1017	2.2000e-004		5.7200e-003	5.7200e-003		5.2600e-003	5.2600e-003	0.0000	19.0871	19.0871	6.1700e-003	0.0000	19.2414
Total	**0.0127**	**0.1360**	**0.1017**	**2.2000e-004**	**0.0807**	**5.7200e-003**	**0.0865**	**0.0180**	**5.2600e-003**	**0.0233**	**0.0000**	**19.0871**	**19.0871**	**6.1700e-003**	**0.0000**	**19.2414**

3.4 Grading - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.8000e-004	2.1000e-004	2.4400e-003	1.0000e-005	7.7000e-004	1.0000e-005	7.7000e-004	2.0000e-004	1.0000e-005	2.1000e-004	0.0000	0.6679	0.6679	2.0000e-005	0.0000	0.6684
Total	**2.8000e-004**	**2.1000e-004**	**2.4400e-003**	**1.0000e-005**	**7.7000e-004**	**1.0000e-005**	**7.7000e-004**	**2.0000e-004**	**1.0000e-005**	**2.1000e-004**	**0.0000**	**0.6679**	**0.6679**	**2.0000e-005**	**0.0000**	**0.6684**

3.5 Building Construction - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.2158	1.9754	2.0700	3.4100e-003		0.1023	0.1023		0.0963	0.0963	0.0000	293.1324	293.1324	0.0702	0.0000	294.8881
Total	**0.2158**	**1.9754**	**2.0700**	**3.4100e-003**		**0.1023**	**0.1023**		**0.0963**	**0.0963**	**0.0000**	**293.1324**	**293.1324**	**0.0702**	**0.0000**	**294.8881**

3.5 Building Construction - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0527	1.6961	0.4580	4.5500e-003	0.1140	3.1800e-003	0.1171	0.0329	3.0400e-003	0.0359	0.0000	441.9835	441.9835	0.0264	0.0000	442.6435
Worker	0.4088	0.3066	3.5305	0.0107	1.1103	8.8700e-003	1.1192	0.2949	8.1700e-003	0.3031	0.0000	966.8117	966.8117	0.0266	0.0000	967.4773
Total	**0.4616**	**2.0027**	**3.9885**	**0.0152**	**1.2243**	**0.0121**	**1.2363**	**0.3278**	**0.0112**	**0.3390**	**0.0000**	**1,408.7952**	**1,408.7952**	**0.0530**	**0.0000**	**1,410.1208**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.2158	1.9754	2.0700	3.4100e-003		0.1023	0.1023		0.0963	0.0963	0.0000	293.1321	293.1321	0.0702	0.0000	294.8877
Total	**0.2158**	**1.9754**	**2.0700**	**3.4100e-003**		**0.1023**	**0.1023**		**0.0963**	**0.0963**	**0.0000**	**293.1321**	**293.1321**	**0.0702**	**0.0000**	**294.8877**

3.5 Building Construction - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0527	1.6961	0.4580	4.5500e-003	0.1140	3.1800e-003	0.1171	0.0329	3.0400e-003	0.0359	0.0000	441.9835	441.9835	0.0264	0.0000	442.6435
Worker	0.4088	0.3066	3.5305	0.0107	1.1103	8.8700e-003	1.1192	0.2949	8.1700e-003	0.3031	0.0000	966.8117	966.8117	0.0266	0.0000	967.4773
Total	**0.4616**	**2.0027**	**3.9885**	**0.0152**	**1.2243**	**0.0121**	**1.2363**	**0.3278**	**0.0112**	**0.3390**	**0.0000**	**1,408.7952**	**1,408.7952**	**0.0530**	**0.0000**	**1,410.1208**

3.5 Building Construction - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1942	1.7765	2.0061	3.3300e-003		0.0864	0.0864		0.0813	0.0813	0.0000	286.2789	286.2789	0.0681	0.0000	287.9814
Total	**0.1942**	**1.7765**	**2.0061**	**3.3300e-003**		**0.0864**	**0.0864**		**0.0813**	**0.0813**	**0.0000**	**286.2789**	**286.2789**	**0.0681**	**0.0000**	**287.9814**

3.5 Building Construction - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0382	1.2511	0.4011	4.3000e-003	0.1113	1.4600e-003	0.1127	0.0321	1.4000e-003	0.0335	0.0000	417.9930	417.9930	0.0228	0.0000	418.5624
Worker	0.3753	0.2708	3.1696	0.0101	1.0840	8.4100e-003	1.0924	0.2879	7.7400e-003	0.2957	0.0000	909.3439	909.3439	0.0234	0.0000	909.9291
Total	**0.4135**	**1.5218**	**3.5707**	**0.0144**	**1.1953**	**9.8700e-003**	**1.2051**	**0.3200**	**9.1400e-003**	**0.3292**	**0.0000**	**1,327.3369**	**1,327.3369**	**0.0462**	**0.0000**	**1,328.4916**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1942	1.7765	2.0061	3.3300e-003		0.0864	0.0864		0.0813	0.0813	0.0000	286.2785	286.2785	0.0681	0.0000	287.9811
Total	**0.1942**	**1.7765**	**2.0061**	**3.3300e-003**		**0.0864**	**0.0864**		**0.0813**	**0.0813**	**0.0000**	**286.2785**	**286.2785**	**0.0681**	**0.0000**	**287.9811**

3.5 Building Construction - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0382	1.2511	0.4011	4.3000e-003	0.1113	1.4600e-003	0.1127	0.0321	1.4000e-003	0.0335	0.0000	417.9930	417.9930	0.0228	0.0000	418.5624
Worker	0.3753	0.2708	3.1696	0.0101	1.0840	8.4100e-003	1.0924	0.2879	7.7400e-003	0.2957	0.0000	909.3439	909.3439	0.0234	0.0000	909.9291
Total	**0.4135**	**1.5218**	**3.5707**	**0.0144**	**1.1953**	**9.8700e-003**	**1.2051**	**0.3200**	**9.1400e-003**	**0.3292**	**0.0000**	**1,327.3369**	**1,327.3369**	**0.0462**	**0.0000**	**1,328.4916**

3.6 Paving - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	6.7100e-003	0.0663	0.0948	1.5000e-004		3.3200e-003	3.3200e-003		3.0500e-003	3.0500e-003	0.0000	13.0175	13.0175	4.2100e-003	0.0000	13.1227
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**6.7100e-003**	**0.0663**	**0.0948**	**1.5000e-004**		**3.3200e-003**	**3.3200e-003**		**3.0500e-003**	**3.0500e-003**	**0.0000**	**13.0175**	**13.0175**	**4.2100e-003**	**0.0000**	**13.1227**

3.6 Paving - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.7000e-004	2.7000e-004	3.1200e-003	1.0000e-005	1.0700e-003	1.0000e-005	1.0800e-003	2.8000e-004	1.0000e-005	2.9000e-004	0.0000	0.8963	0.8963	2.0000e-005	0.0000	0.8968
Total	**3.7000e-004**	**2.7000e-004**	**3.1200e-003**	**1.0000e-005**	**1.0700e-003**	**1.0000e-005**	**1.0800e-003**	**2.8000e-004**	**1.0000e-005**	**2.9000e-004**	**0.0000**	**0.8963**	**0.8963**	**2.0000e-005**	**0.0000**	**0.8968**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	6.7100e-003	0.0663	0.0948	1.5000e-004		3.3200e-003	3.3200e-003		3.0500e-003	3.0500e-003	0.0000	13.0175	13.0175	4.2100e-003	0.0000	13.1227
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**6.7100e-003**	**0.0663**	**0.0948**	**1.5000e-004**		**3.3200e-003**	**3.3200e-003**		**3.0500e-003**	**3.0500e-003**	**0.0000**	**13.0175**	**13.0175**	**4.2100e-003**	**0.0000**	**13.1227**

3.6 Paving - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.7000e-004	2.7000e-004	3.1200e-003	1.0000e-005	1.0700e-003	1.0000e-005	1.0800e-003	2.8000e-004	1.0000e-005	2.9000e-004	0.0000	0.8963	0.8963	2.0000e-005	0.0000	0.8968
Total	**3.7000e-004**	**2.7000e-004**	**3.1200e-003**	**1.0000e-005**	**1.0700e-003**	**1.0000e-005**	**1.0800e-003**	**2.8000e-004**	**1.0000e-005**	**2.9000e-004**	**0.0000**	**0.8963**	**0.8963**	**2.0000e-005**	**0.0000**	**0.8968**

3.6 Paving - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0109	0.1048	0.1609	2.5000e-004		5.1500e-003	5.1500e-003		4.7400e-003	4.7400e-003	0.0000	22.0292	22.0292	7.1200e-003	0.0000	22.2073
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0109**	**0.1048**	**0.1609**	**2.5000e-004**		**5.1500e-003**	**5.1500e-003**		**4.7400e-003**	**4.7400e-003**	**0.0000**	**22.0292**	**22.0292**	**7.1200e-003**	**0.0000**	**22.2073**

3.6 Paving - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.9000e-004	4.1000e-004	4.9200e-003	2.0000e-005	1.8100e-003	1.0000e-005	1.8200e-003	4.8000e-004	1.0000e-005	4.9000e-004	0.0000	1.4697	1.4697	4.0000e-005	0.0000	1.4706
Total	**5.9000e-004**	**4.1000e-004**	**4.9200e-003**	**2.0000e-005**	**1.8100e-003**	**1.0000e-005**	**1.8200e-003**	**4.8000e-004**	**1.0000e-005**	**4.9000e-004**	**0.0000**	**1.4697**	**1.4697**	**4.0000e-005**	**0.0000**	**1.4706**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0109	0.1048	0.1609	2.5000e-004		5.1500e-003	5.1500e-003		4.7400e-003	4.7400e-003	0.0000	22.0292	22.0292	7.1200e-003	0.0000	22.2073
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0109**	**0.1048**	**0.1609**	**2.5000e-004**		**5.1500e-003**	**5.1500e-003**		**4.7400e-003**	**4.7400e-003**	**0.0000**	**22.0292**	**22.0292**	**7.1200e-003**	**0.0000**	**22.2073**

3.6 Paving - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.9000e-004	4.1000e-004	4.9200e-003	2.0000e-005	1.8100e-003	1.0000e-005	1.8200e-003	4.8000e-004	1.0000e-005	4.9000e-004	0.0000	1.4697	1.4697	4.0000e-005	0.0000	1.4706
Total	**5.9000e-004**	**4.1000e-004**	**4.9200e-003**	**2.0000e-005**	**1.8100e-003**	**1.0000e-005**	**1.8200e-003**	**4.8000e-004**	**1.0000e-005**	**4.9000e-004**	**0.0000**	**1.4697**	**1.4697**	**4.0000e-005**	**0.0000**	**1.4706**

3.7 Architectural Coating - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	4.1372					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.1600e-003	0.0213	0.0317	5.0000e-005		1.0700e-003	1.0700e-003		1.0700e-003	1.0700e-003	0.0000	4.4682	4.4682	2.5000e-004	0.0000	4.4745
Total	**4.1404**	**0.0213**	**0.0317**	**5.0000e-005**		**1.0700e-003**	**1.0700e-003**		**1.0700e-003**	**1.0700e-003**	**0.0000**	**4.4682**	**4.4682**	**2.5000e-004**	**0.0000**	**4.4745**

3.7 Architectural Coating - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0101	6.9900e-003	0.0835	2.8000e-004	0.0307	2.3000e-004	0.0309	8.1500e-003	2.2000e-004	8.3700e-003	0.0000	24.9407	24.9407	6.1000e-004	0.0000	24.9558
Total	**0.0101**	**6.9900e-003**	**0.0835**	**2.8000e-004**	**0.0307**	**2.3000e-004**	**0.0309**	**8.1500e-003**	**2.2000e-004**	**8.3700e-003**	**0.0000**	**24.9407**	**24.9407**	**6.1000e-004**	**0.0000**	**24.9558**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	4.1372					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.1600e-003	0.0213	0.0317	5.0000e-005		1.0700e-003	1.0700e-003		1.0700e-003	1.0700e-003	0.0000	4.4682	4.4682	2.5000e-004	0.0000	4.4745
Total	**4.1404**	**0.0213**	**0.0317**	**5.0000e-005**		**1.0700e-003**	**1.0700e-003**		**1.0700e-003**	**1.0700e-003**	**0.0000**	**4.4682**	**4.4682**	**2.5000e-004**	**0.0000**	**4.4745**

3.7 Architectural Coating - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0101	6.9900e-003	0.0835	2.8000e-004	0.0307	2.3000e-004	0.0309	8.1500e-003	2.2000e-004	8.3700e-003	0.0000	24.9407	24.9407	6.1000e-004	0.0000	24.9558
Total	**0.0101**	**6.9900e-003**	**0.0835**	**2.8000e-004**	**0.0307**	**2.3000e-004**	**0.0309**	**8.1500e-003**	**2.2000e-004**	**8.3700e-003**	**0.0000**	**24.9407**	**24.9407**	**6.1000e-004**	**0.0000**	**24.9558**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	1.5857	7.9962	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620.4986	7,620.4986	0.3407	0.0000	7,629.0162
Unmitigated	1.5857	7.9962	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620.4986	7,620.4986	0.3407	0.0000	7,629.0162

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Low Rise	145.75	154.25	154.00	506,227	506,227
Apartments Mid Rise	4,026.75	3,773.25	4075.50	13,660,065	13,660,065
General Office Building	288.45	62.55	31.05	706,812	706,812
High Turnover (Sit Down Restaurant)	2,368.80	2,873.52	2817.72	3,413,937	3,413,937
Hotel	192.00	187.50	160.00	445,703	445,703
Quality Restaurant	501.12	511.92	461.20	707,488	707,488
Regional Shopping Center	528.08	601.44	357.84	1,112,221	1,112,221
Total	8,050.95	8,164.43	8,057.31	20,552,452	20,552,452

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Low Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
Apartments Mid Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
General Office Building	16.60	8.40	6.90	33.00	48.00	19.00	77	19	4
High Turnover (Sit Down	16.60	8.40	6.90	8.50	72.50	19.00	37	20	43
Hotel	16.60	8.40	6.90	19.40	61.60	19.00	58	38	4
Quality Restaurant	16.60	8.40	6.90	12.00	69.00	19.00	38	18	44
Regional Shopping Center	16.60	8.40	6.90	16.30	64.70	19.00	54	35	11

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Apartments Mid Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
General Office Building	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
High Turnover (Sit Down Restaurant)	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Hotel	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Quality Restaurant	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Regional Shopping Center	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	2,512.6465	2,512.6465	0.1037	0.0215	2,521.6356
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	2,512.6465	2,512.6465	0.1037	0.0215	2,521.6356
NaturalGas Mitigated	0.1398	1.2312	0.7770	7.6200e-003		0.0966	0.0966		0.0966	0.0966	0.0000	1,383.4267	1,383.4267	0.0265	0.0254	1,391.6478
NaturalGas Unmitigated	0.1398	1.2312	0.7770	7.6200e-003		0.0966	0.0966		0.0966	0.0966	0.0000	1,383.4267	1,383.4267	0.0265	0.0254	1,391.6478

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	408494	2.2000e-003	0.0188	8.0100e-003	1.2000e-004		1.5200e-003	1.5200e-003		1.5200e-003	1.5200e-003	0.0000	21.7988	21.7988	4.2000e-004	4.0000e-004	21.9284
Apartments Mid Rise	1.30613e+007	0.0704	0.6018	0.2561	3.8400e-003		0.0487	0.0487		0.0487	0.0487	0.0000	696.9989	696.9989	0.0134	0.0128	701.1408
General Office Building	468450	2.5300e-003	0.0230	0.0193	1.4000e-004		1.7500e-003	1.7500e-003		1.7500e-003	1.7500e-003	0.0000	24.9983	24.9983	4.8000e-004	4.6000e-004	25.1468
High Turnover (Sit Down Restaurant)	8.30736e+006	0.0448	0.4072	0.3421	2.4400e-003		0.0310	0.0310		0.0310	0.0310	0.0000	443.3124	443.3124	8.5000e-003	8.1300e-003	445.9468
Hotel	1.74095e+006	9.3900e-003	0.0853	0.0717	5.1000e-004		6.4900e-003	6.4900e-003		6.4900e-003	6.4900e-003	0.0000	92.9036	92.9036	1.7800e-003	1.7000e-003	93.4557
Quality Restaurant	1.84608e+006	9.9500e-003	0.0905	0.0760	5.4000e-004		6.8800e-003	6.8800e-003		6.8800e-003	6.8800e-003	0.0000	98.5139	98.5139	1.8900e-003	1.8100e-003	99.0993
Regional Shopping Center	91840	5.0000e-004	4.5000e-003	3.7800e-003	3.0000e-005		3.4000e-004	3.4000e-004		3.4000e-004	3.4000e-004	0.0000	4.9009	4.9009	9.0000e-005	9.0000e-005	4.9301
Total		**0.1398**	**1.2312**	**0.7770**	**7.6200e-003**		**0.0966**	**0.0966**		**0.0966**	**0.0966**	**0.0000**	**1,383.4268**	**1,383.4268**	**0.0265**	**0.0254**	**1,391.6478**

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	408494	2.2000e-003	0.0188	8.0100e-003	1.2000e-004		1.5200e-003	1.5200e-003		1.5200e-003	1.5200e-003	0.0000	21.7988	21.7988	4.2000e-004	4.0000e-004	21.9284
Apartments Mid Rise	1.30613e+007	0.0704	0.6018	0.2561	3.8400e-003		0.0487	0.0487		0.0487	0.0487	0.0000	696.9989	696.9989	0.0134	0.0128	701.1408
General Office Building	468450	2.5300e-003	0.0230	0.0193	1.4000e-004		1.7500e-003	1.7500e-003		1.7500e-003	1.7500e-003	0.0000	24.9983	24.9983	4.8000e-004	4.6000e-004	25.1468
High Turnover (Sit Down Restaurant)	8.30736e+006	0.0448	0.4072	0.3421	2.4400e-003		0.0310	0.0310		0.0310	0.0310	0.0000	443.3124	443.3124	8.5000e-003	8.1300e-003	445.9468
Hotel	1.74095e+006	9.3900e-003	0.0853	0.0717	5.1000e-004		6.4900e-003	6.4900e-003		6.4900e-003	6.4900e-003	0.0000	92.9036	92.9036	1.7800e-003	1.7000e-003	93.4557
Quality Restaurant	1.84608e+006	9.9500e-003	0.0905	0.0760	5.4000e-004		6.8800e-003	6.8800e-003		6.8800e-003	6.8800e-003	0.0000	98.5139	98.5139	1.8900e-003	1.8100e-003	99.0993
Regional Shopping Center	91840	5.0000e-004	4.5000e-003	3.7800e-003	3.0000e-005		3.4000e-004	3.4000e-004		3.4000e-004	3.4000e-004	0.0000	4.9009	4.9009	9.0000e-005	9.0000e-005	4.9301
Total		**0.1398**	**1.2312**	**0.7770**	**7.6200e-003**		**0.0966**	**0.0966**		**0.0966**	**0.0966**	**0.0000**	**1,383.4268**	**1,383.4268**	**0.0265**	**0.0254**	**1,391.6478**

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	106010	33.7770	1.3900e-003	2.9000e-004	33.8978
Apartments Mid Rise	3.94697e+006	1,257.5879	0.0519	0.0107	1,262.0869
General Office Building	584550	186.2502	7.6900e-003	1.5900e-003	186.9165
High Turnover (Sit Down Restaurant)	1.58904e+006	506.3022	0.0209	4.3200e-003	508.1135
Hotel	550308	175.3399	7.2400e-003	1.5000e-003	175.9672
Quality Restaurant	353120	112.5116	4.6500e-003	9.6000e-004	112.9141
Regional Shopping Center	756000	240.8778	9.9400e-003	2.0600e-003	241.7395
Total		**2,512.6465**	**0.1037**	**0.0215**	**2,521.6356**

5.3 Energy by Land Use - Electricity

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	106010	33.7770	1.3900e-003	2.9000e-004	33.8978
Apartments Mid Rise	3.94697e+006	1,257.5879	0.0519	0.0107	1,262.0869
General Office Building	584550	186.2502	7.6900e-003	1.5900e-003	186.9165
High Turnover (Sit Down Restaurant)	1.58904e+006	506.3022	0.0209	4.3200e-003	508.1135
Hotel	550308	175.3399	7.2400e-003	1.5000e-003	175.9672
Quality Restaurant	353120	112.5116	4.6500e-003	9.6000e-004	112.9141
Regional Shopping Center	756000	240.8778	9.9400e-003	2.0600e-003	241.7395
Total		**2,512.6465**	**0.1037**	**0.0215**	**2,521.6356**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	5.1437	0.2950	10.3804	1.6700e-003		0.0714	0.0714		0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835
Unmitigated	5.1437	0.2950	10.3804	1.6700e-003		0.0714	0.0714		0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.4137					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	4.3998					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0206	0.1763	0.0750	1.1200e-003		0.0143	0.0143		0.0143	0.0143	0.0000	204.1166	204.1166	3.9100e-003	3.7400e-003	205.3295
Landscaping	0.3096	0.1187	10.3054	5.4000e-004		0.0572	0.0572		0.0572	0.0572	0.0000	16.8504	16.8504	0.0161	0.0000	17.2540
Total	**5.1437**	**0.2950**	**10.3804**	**1.6600e-003**		**0.0714**	**0.0714**		**0.0714**	**0.0714**	**0.0000**	**220.9670**	**220.9670**	**0.0201**	**3.7400e-003**	**222.5835**

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.4137					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	4.3998					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0206	0.1763	0.0750	1.1200e-003		0.0143	0.0143		0.0143	0.0143	0.0000	204.1166	204.1166	3.9100e-003	3.7400e-003	205.3295
Landscaping	0.3096	0.1187	10.3054	5.4000e-004		0.0572	0.0572		0.0572	0.0572	0.0000	16.8504	16.8504	0.0161	0.0000	17.2540
Total	**5.1437**	**0.2950**	**10.3804**	**1.6600e-003**		**0.0714**	**0.0714**		**0.0714**	**0.0714**	**0.0000**	**220.9670**	**220.9670**	**0.0201**	**3.7400e-003**	**222.5835**

7.0 Water Detail

7.1 Mitigation Measures Water

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	585.8052	3.0183	0.0755	683.7567
Unmitigated	585.8052	3.0183	0.0755	683.7567

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	1.62885 / 1.02688	10.9095	0.0535	1.3400e-003	12.6471
Apartments Mid Rise	63.5252 / 40.0485	425.4719	2.0867	0.0523	493.2363
General Office Building	7.99802 / 4.90201	53.0719	0.2627	6.5900e-003	61.6019
High Turnover (Sit Down Restaurant)	10.9272 / 0.697482	51.2702	0.3580	8.8200e-003	62.8482
Hotel	1.26834 / 0.140927	6.1633	0.0416	1.0300e-003	7.5079
Quality Restaurant	2.42827 / 0.154996	11.3934	0.0796	1.9600e-003	13.9663
Regional Shopping Center	4.14806 / 2.54236	27.5250	0.1363	3.4200e-003	31.9490
Total		**585.8052**	**3.0183**	**0.0755**	**683.7567**

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	1.62885 / 1.02688	10.9095	0.0535	1.3400e-003	12.6471
Apartments Mid Rise	63.5252 / 40.0485	425.4719	2.0867	0.0523	493.2363
General Office Building	7.99802 / 4.90201	53.0719	0.2627	6.5900e-003	61.6019
High Turnover (Sit Down Restaurant)	10.9272 / 0.697482	51.2702	0.3580	8.8200e-003	62.8482
Hotel	1.26834 / 0.140927	6.1633	0.0416	1.0300e-003	7.5079
Quality Restaurant	2.42827 / 0.154996	11.3934	0.0796	1.9600e-003	13.9663
Regional Shopping Center	4.14806 / 2.54236	27.5250	0.1363	3.4200e-003	31.9490
Total		**585.8052**	**3.0183**	**0.0755**	**683.7567**

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	207.8079	12.2811	0.0000	514.8354
Unmitigated	207.8079	12.2811	0.0000	514.8354

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	11.5	2.3344	0.1380	0.0000	5.7834
Apartments Mid Rise	448.5	91.0415	5.3804	0.0000	225.5513
General Office Building	41.85	8.4952	0.5021	0.0000	21.0464
High Turnover (Sit Down Restaurant)	428.4	86.9613	5.1393	0.0000	215.4430
Hotel	27.38	5.5579	0.3285	0.0000	13.7694
Quality Restaurant	7.3	1.4818	0.0876	0.0000	3.6712
Regional Shopping Center	58.8	11.9359	0.7054	0.0000	29.5706
Total		**207.8079**	**12.2811**	**0.0000**	**514.8354**

8.2 Waste by Land Use

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	11.5	2.3344	0.1380	0.0000	5.7834
Apartments Mid Rise	448.5	91.0415	5.3804	0.0000	225.5513
General Office Building	41.85	8.4952	0.5021	0.0000	21.0464
High Turnover (Sit Down Restaurant)	428.4	86.9613	5.1393	0.0000	215.4430
Hotel	27.38	5.5579	0.3285	0.0000	13.7694
Quality Restaurant	7.3	1.4818	0.0876	0.0000	3.6712
Regional Shopping Center	58.8	11.9359	0.7054	0.0000	29.5706
Total		**207.8079**	**12.2811**	**0.0000**	**514.8354**

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

Village South Specific Plan (Proposed)

Los Angeles-South Coast County, Summer

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Office Building	45.00	1000sqft	1.03	45,000.00	0
High Turnover (Sit Down Restaurant)	36.00	1000sqft	0.83	36,000.00	0
Hotel	50.00	Room	1.67	72,600.00	0
Quality Restaurant	8.00	1000sqft	0.18	8,000.00	0
Apartments Low Rise	25.00	Dwelling Unit	1.56	25,000.00	72
Apartments Mid Rise	975.00	Dwelling Unit	25.66	975,000.00	2789
Regional Shopping Center	56.00	1000sqft	1.29	56,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	33
Climate Zone	9			**Operational Year**	2028
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	702.44	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

Project Characteristics - Consistent with the DEIR's model.

Land Use - See SWAPE comment regarding residential and retail land uses.

Construction Phase - See SWAPE comment regarding individual construction phase lengths.

Demolition - Consistent with the DEIR's model. See SWAPE comment regarding demolition.

Vehicle Trips - Saturday trips consistent with the DEIR's model. See SWAPE comment regarding weekday and Sunday trips.

Woodstoves - Woodstoves and wood-burning fireplaces consistent with the DEIR's model. See SWAPE comment regarding gas fireplaces.

Energy Use -

Construction Off-road Equipment Mitigation - See SWAPE comment on construction-related mitigation.

Area Mitigation - See SWAPE comment regarding operational mitigation measures.

Water Mitigation - See SWAPE comment regarding operational mitigation measures.

Table Name	Column Name	Default Value	New Value
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	NumberWood	1.25	0.00
tblFireplaces	NumberWood	48.75	0.00
tblVehicleTrips	ST_TR	7.16	6.17
tblVehicleTrips	ST_TR	6.39	3.87
tblVehicleTrips	ST_TR	2.46	1.39
tblVehicleTrips	ST_TR	158.37	79.82
tblVehicleTrips	ST_TR	8.19	3.75
tblVehicleTrips	ST_TR	94.36	63.99
tblVehicleTrips	ST_TR	49.97	10.74
tblVehicleTrips	SU_TR	6.07	6.16
tblVehicleTrips	SU_TR	5.86	4.18
tblVehicleTrips	SU_TR	1.05	0.69
tblVehicleTrips	SU_TR	131.84	78.27

tblVehicleTrips	SU_TR	5.95	3.20
tblVehicleTrips	SU_TR	72.16	57.65
tblVehicleTrips	SU_TR	25.24	6.39
tblVehicleTrips	WD_TR	6.59	5.83
tblVehicleTrips	WD_TR	6.65	4.13
tblVehicleTrips	WD_TR	11.03	6.41
tblVehicleTrips	WD_TR	127.15	65.80
tblVehicleTrips	WD_TR	8.17	3.84
tblVehicleTrips	WD_TR	89.95	62.64
tblVehicleTrips	WD_TR	42.70	9.43
tblWoodstoves	NumberCatalytic	1.25	0.00
tblWoodstoves	NumberCatalytic	48.75	0.00
tblWoodstoves	NumberNoncatalytic	1.25	0.00
tblWoodstoves	NumberNoncatalytic	48.75	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	4.2769	46.4588	31.6840	0.0643	18.2675	2.0461	20.3135	9.9840	1.8824	11.8664	0.0000	6,234.7974	6,234.7974	1.9495	0.0000	6,283.5352
2022	5.3304	38.8967	49.5629	0.1517	9.8688	1.6366	10.7727	3.6558	1.5057	5.1615	0.0000	15,251.5674	15,251.5674	1.9503	0.0000	15,278.5288
2023	4.8957	26.3317	46.7567	0.1472	9.8688	0.7794	10.6482	2.6381	0.7322	3.3702	0.0000	14,807.5269	14,807.5269	1.0250	0.0000	14,833.1521
2024	237.1630	9.5575	15.1043	0.0244	1.7884	0.4698	1.8628	0.4743	0.4322	0.5476	0.0000	2,361.3989	2,361.3989	0.7177	0.0000	2,379.3421
Maximum	**237.1630**	**46.4588**	**49.5629**	**0.1517**	**18.2675**	**2.0461**	**20.3135**	**9.9840**	**1.8824**	**11.8664**	**0.0000**	**15,251.5674**	**15,251.5674**	**1.9503**	**0.0000**	**15,278.5288**

2.1 Overall Construction (Maximum Daily Emission)

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	4.2769	46.4588	31.6840	0.0643	18.2675	2.0461	20.3135	9.9840	1.8824	11.8664	0.0000	6,234.7974	6,234.7974	1.9495	0.0000	6,283.5352
2022	5.3304	38.8967	49.5629	0.1517	9.8688	1.6366	10.7727	3.6558	1.5057	5.1615	0.0000	15,251.5674	15,251.5674	1.9503	0.0000	15,278.5288
2023	4.8957	26.3317	46.7567	0.1472	9.8688	0.7794	10.6482	2.6381	0.7322	3.3702	0.0000	14,807.5269	14,807.5269	1.0250	0.0000	14,833.1520
2024	237.1630	9.5575	15.1043	0.0244	1.7884	0.4698	1.8628	0.4743	0.4322	0.5476	0.0000	2,361.3989	2,361.3989	0.7177	0.0000	2,379.3421
Maximum	**237.1630**	**46.4588**	**49.5629**	**0.1517**	**18.2675**	**2.0461**	**20.3135**	**9.9840**	**1.8824**	**11.8664**	**0.0000**	**15,251.5674**	**15,251.5674**	**1.9503**	**0.0000**	**15,278.5288**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Energy	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
Mobile	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070		50,306.6034	50,306.6034	2.1807		50,361.1208
Total	**41.1168**	**67.2262**	**207.5497**	**0.6278**	**45.9592**	**2.4626**	**48.4217**	**12.2950**	**2.4385**	**14.7336**	**0.0000**	**76,811.1816**	**76,811.1816**	**2.8282**	**0.4832**	**77,025.8786**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Energy	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
Mobile	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070		50,306.6034	50,306.6034	2.1807		50,361.1208
Total	**41.1168**	**67.2262**	**207.5497**	**0.6278**	**45.9592**	**2.4626**	**48.4217**	**12.2950**	**2.4385**	**14.7336**	**0.0000**	**76,811.1816**	**76,811.1816**	**2.8282**	**0.4832**	**77,025.8786**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	9/1/2021	10/12/2021	5	30	
2	Site Preparation	Site Preparation	10/13/2021	11/9/2021	5	20	
3	Grading	Grading	11/10/2021	1/11/2022	5	45	
4	Building Construction	Building Construction	1/12/2022	12/12/2023	5	500	
5	Paving	Paving	12/13/2023	1/30/2024	5	35	
6	Architectural Coating	Architectural Coating	1/31/2024	3/19/2024	5	35	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 112.5

Acres of Paving: 0

Residential Indoor: 2,025,000; Residential Outdoor: 675,000; Non-Residential Indoor: 326,400; Non-Residential Outdoor: 108,800; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	458.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	7	18.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	801.00	143.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	160.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					3.3074	0.0000	3.3074	0.5008	0.0000	0.5008			0.0000			0.0000
Off-Road	3.1651	31.4407	21.5650	0.0388		1.5513	1.5513		1.4411	1.4411		3,747.9449	3,747.9449	1.0549		3,774.3174
Total	**3.1651**	**31.4407**	**21.5650**	**0.0388**	**3.3074**	**1.5513**	**4.8588**	**0.5008**	**1.4411**	**1.9419**		**3,747.9449**	**3,747.9449**	**1.0549**		**3,774.3174**

3.2 Demolition - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1273	4.0952	0.9602	0.0119	0.2669	0.0126	0.2795	0.0732	0.0120	0.0852		1,292.2413	1,292.2413	0.0877		1,294.4337
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0643	0.0442	0.6042	1.7100e-003	0.1677	1.3500e-003	0.1690	0.0445	1.2500e-003	0.0457		170.8155	170.8155	5.0300e-003		170.9413
Total	**0.1916**	**4.1394**	**1.5644**	**0.0136**	**0.4346**	**0.0139**	**0.4485**	**0.1176**	**0.0133**	**0.1309**		**1,463.0568**	**1,463.0568**	**0.0927**		**1,465.3750**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					3.3074	0.0000	3.3074	0.5008	0.0000	0.5008			0.0000			0.0000
Off-Road	3.1651	31.4407	21.5650	0.0388		1.5513	1.5513		1.4411	1.4411	0.0000	3,747.9449	3,747.9449	1.0549		3,774.3174
Total	**3.1651**	**31.4407**	**21.5650**	**0.0388**	**3.3074**	**1.5513**	**4.8588**	**0.5008**	**1.4411**	**1.9419**	**0.0000**	**3,747.9449**	**3,747.9449**	**1.0549**		**3,774.3174**

3.2 Demolition - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1273	4.0952	0.9602	0.0119	0.2669	0.0126	0.2795	0.0732	0.0120	0.0852		1,292.2413	1,292.2413	0.0877		1,294.4337
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0643	0.0442	0.6042	1.7100e-003	0.1677	1.3500e-003	0.1690	0.0445	1.2500e-003	0.0457		170.8155	170.8155	5.0300e-003		170.9413
Total	**0.1916**	**4.1394**	**1.5644**	**0.0136**	**0.4346**	**0.0139**	**0.4485**	**0.1176**	**0.0133**	**0.1309**		**1,463.0568**	**1,463.0568**	**0.0927**		**1,465.3750**

3.3 Site Preparation - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809		3,685.6569	3,685.6569	1.1920		3,715.4573
Total	**3.8882**	**40.4971**	**21.1543**	**0.0380**	**18.0663**	**2.0445**	**20.1107**	**9.9307**	**1.8809**	**11.8116**		**3,685.6569**	**3,685.6569**	**1.1920**		**3,715.4573**

3.3 Site Preparation - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0772	0.0530	0.7250	2.0600e-003	0.2012	1.6300e-003	0.2028	0.0534	1.5000e-003	0.0549		204.9786	204.9786	6.0400e-003		205.1296
Total	**0.0772**	**0.0530**	**0.7250**	**2.0600e-003**	**0.2012**	**1.6300e-003**	**0.2028**	**0.0534**	**1.5000e-003**	**0.0549**		**204.9786**	**204.9786**	**6.0400e-003**		**205.1296**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809	0.0000	3,685.6569	3,685.6569	1.1920		3,715.4573
Total	**3.8882**	**40.4971**	**21.1543**	**0.0380**	**18.0663**	**2.0445**	**20.1107**	**9.9307**	**1.8809**	**11.8116**	**0.0000**	**3,685.6569**	**3,685.6569**	**1.1920**		**3,715.4573**

3.3 Site Preparation - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0772	0.0530	0.7250	2.0600e-003	0.2012	1.6300e-003	0.2028	0.0534	1.5000e-003	0.0549		204.9786	204.9786	6.0400e-003		205.1296
Total	**0.0772**	**0.0530**	**0.7250**	**2.0600e-003**	**0.2012**	**1.6300e-003**	**0.2028**	**0.0534**	**1.5000e-003**	**0.0549**		**204.9786**	**204.9786**	**6.0400e-003**		**205.1296**

3.4 Grading - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620		1.9853	1.9853		1.8265	1.8265		6,007.0434	6,007.0434	1.9428		6,055.6134
Total	**4.1912**	**46.3998**	**30.8785**	**0.0620**	**8.6733**	**1.9853**	**10.6587**	**3.5965**	**1.8265**	**5.4230**		**6,007.0434**	**6,007.0434**	**1.9428**		**6,055.6134**

3.4 Grading - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0857	0.0589	0.8056	2.2900e-003	0.2236	1.8100e-003	0.2254	0.0593	1.6600e-003	0.0610		227.7540	227.7540	6.7100e-003		227.9217
Total	**0.0857**	**0.0589**	**0.8056**	**2.2900e-003**	**0.2236**	**1.8100e-003**	**0.2254**	**0.0593**	**1.6600e-003**	**0.0610**		**227.7540**	**227.7540**	**6.7100e-003**		**227.9217**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620		1.9853	1.9853		1.8265	1.8265	0.0000	6,007.0434	6,007.0434	1.9428		6,055.6134
Total	**4.1912**	**46.3998**	**30.8785**	**0.0620**	**8.6733**	**1.9853**	**10.6587**	**3.5965**	**1.8265**	**5.4230**	**0.0000**	**6,007.0434**	**6,007.0434**	**1.9428**		**6,055.6134**

3.4 Grading - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0857	0.0589	0.8056	2.2900e-003	0.2236	1.8100e-003	0.2254	0.0593	1.6600e-003	0.0610		227.7540	227.7540	6.7100e-003		227.9217
Total	**0.0857**	**0.0589**	**0.8056**	**2.2900e-003**	**0.2236**	**1.8100e-003**	**0.2254**	**0.0593**	**1.6600e-003**	**0.0610**		**227.7540**	**227.7540**	**6.7100e-003**		**227.9217**

3.4 Grading - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	3.6248	38.8435	29.0415	0.0621		1.6349	1.6349		1.5041	1.5041		6,011.4105	6,011.4105	1.9442		6,060.0158
Total	**3.6248**	**38.8435**	**29.0415**	**0.0621**	**8.6733**	**1.6349**	**10.3082**	**3.5965**	**1.5041**	**5.1006**		**6,011.4105**	**6,011.4105**	**1.9442**		**6,060.0158**

3.4 Grading - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0803	0.0532	0.7432	2.2100e-003	0.2236	1.7500e-003	0.2253	0.0593	1.6100e-003	0.0609		219.7425	219.7425	6.0600e-003		219.8941
Total	**0.0803**	**0.0532**	**0.7432**	**2.2100e-003**	**0.2236**	**1.7500e-003**	**0.2253**	**0.0593**	**1.6100e-003**	**0.0609**		**219.7425**	**219.7425**	**6.0600e-003**		**219.8941**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	3.6248	38.8435	29.0415	0.0621		1.6349	1.6349		1.5041	1.5041	0.0000	6,011.4105	6,011.4105	1.9442		6,060.0158
Total	**3.6248**	**38.8435**	**29.0415**	**0.0621**	**8.6733**	**1.6349**	**10.3082**	**3.5965**	**1.5041**	**5.1006**	**0.0000**	**6,011.4105**	**6,011.4105**	**1.9442**		**6,060.0158**

3.4 Grading - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0803	0.0532	0.7432	2.2100e-003	0.2236	1.7500e-003	0.2253	0.0593	1.6100e-003	0.0609		219.7425	219.7425	6.0600e-003		219.8941
Total	**0.0803**	**0.0532**	**0.7432**	**2.2100e-003**	**0.2236**	**1.7500e-003**	**0.2253**	**0.0593**	**1.6100e-003**	**0.0609**		**219.7425**	**219.7425**	**6.0600e-003**		**219.8941**

3.5 Building Construction - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.7062	15.6156	16.3634	0.0269		0.8090	0.8090		0.7612	0.7612		2,554.3336	2,554.3336	0.6120		2,569.6322
Total	**1.7062**	**15.6156**	**16.3634**	**0.0269**		**0.8090**	**0.8090**		**0.7612**	**0.7612**		**2,554.3336**	**2,554.3336**	**0.6120**		**2,569.6322**

3.5 Building Construction - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.4079	13.2032	3.4341	0.0364	0.9155	0.0248	0.9404	0.2636	0.0237	0.2873		3,896.5482	3,896.5482	0.2236		3,902.1384
Worker	3.2162	2.1318	29.7654	0.0883	8.9533	0.0701	9.0234	2.3745	0.0646	2.4390		8,800.6857	8,800.6857	0.2429		8,806.7582
Total	**3.6242**	**15.3350**	**33.1995**	**0.1247**	**9.8688**	**0.0949**	**9.9637**	**2.6381**	**0.0883**	**2.7263**		**12,697.2339**	**12,697.2339**	**0.4665**		**12,708.8966**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.7062	15.6156	16.3634	0.0269		0.8090	0.8090		0.7612	0.7612	0.0000	2,554.3336	2,554.3336	0.6120		2,569.6322
Total	**1.7062**	**15.6156**	**16.3634**	**0.0269**		**0.8090**	**0.8090**		**0.7612**	**0.7612**	**0.0000**	**2,554.3336**	**2,554.3336**	**0.6120**		**2,569.6322**

3.5 Building Construction - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.4079	13.2032	3.4341	0.0364	0.9155	0.0248	0.9404	0.2636	0.0237	0.2873		3,896.5482	3,896.5482	0.2236		3,902.1384
Worker	3.2162	2.1318	29.7654	0.0883	8.9533	0.0701	9.0234	2.3745	0.0646	2.4390		8,800.6857	8,800.6857	0.2429		8,806.7582
Total	**3.6242**	**15.3350**	**33.1995**	**0.1247**	**9.8688**	**0.0949**	**9.9637**	**2.6381**	**0.0883**	**2.7263**		**12,697.2339**	**12,697.2339**	**0.4665**		**12,708.8966**

3.5 Building Construction - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584		2,555.2099	2,555.2099	0.6079		2,570.4061
Total	**1.5728**	**14.3849**	**16.2440**	**0.0269**		**0.6997**	**0.6997**		**0.6584**	**0.6584**		**2,555.2099**	**2,555.2099**	**0.6079**		**2,570.4061**

3.5 Building Construction - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.3027	10.0181	3.1014	0.0352	0.9156	0.0116	0.9271	0.2636	0.0111	0.2747		3,773.8762	3,773.8762	0.1982		3,778.8300
Worker	3.0203	1.9287	27.4113	0.0851	8.9533	0.0681	9.0214	2.3745	0.0627	2.4372		8,478.4408	8,478.4408	0.2190		8,483.9160
Total	**3.3229**	**11.9468**	**30.5127**	**0.1203**	**9.8688**	**0.0797**	**9.9485**	**2.6381**	**0.0738**	**2.7118**		**12,252.3170**	**12,252.3170**	**0.4172**		**12,262.7460**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584	0.0000	2,555.2099	2,555.2099	0.6079		2,570.4061
Total	**1.5728**	**14.3849**	**16.2440**	**0.0269**		**0.6997**	**0.6997**		**0.6584**	**0.6584**	**0.0000**	**2,555.2099**	**2,555.2099**	**0.6079**		**2,570.4061**

3.5 Building Construction - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.3027	10.0181	3.1014	0.0352	0.9156	0.0116	0.9271	0.2636	0.0111	0.2747		3,773.8762	3,773.8762	0.1982		3,778.8300
Worker	3.0203	1.9287	27.4113	0.0851	8.9533	0.0681	9.0214	2.3745	0.0627	2.4372		8,478.4408	8,478.4408	0.2190		8,483.9160
Total	**3.3229**	**11.9468**	**30.5127**	**0.1203**	**9.8688**	**0.0797**	**9.9485**	**2.6381**	**0.0738**	**2.7118**		**12,252.3170**	**12,252.3170**	**0.4172**		**12,262.7460**

3.6 Paving - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.0327	10.1917	14.5842	0.0228		0.5102	0.5102		0.4694	0.4694		2,207.5841	2,207.5841	0.7140		2,225.4336
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.0327**	**10.1917**	**14.5842**	**0.0228**		**0.5102**	**0.5102**		**0.4694**	**0.4694**		**2,207.5841**	**2,207.5841**	**0.7140**		**2,225.4336**

3.6 Paving - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0566	0.0361	0.5133	1.5900e-003	0.1677	1.2800e-003	0.1689	0.0445	1.1700e-003	0.0456		158.7723	158.7723	4.1000e-003		158.8748
Total	**0.0566**	**0.0361**	**0.5133**	**1.5900e-003**	**0.1677**	**1.2800e-003**	**0.1689**	**0.0445**	**1.1700e-003**	**0.0456**		**158.7723**	**158.7723**	**4.1000e-003**		**158.8748**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.0327	10.1917	14.5842	0.0228		0.5102	0.5102		0.4694	0.4694	0.0000	2,207.5841	2,207.5841	0.7140		2,225.4336
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.0327**	**10.1917**	**14.5842**	**0.0228**		**0.5102**	**0.5102**		**0.4694**	**0.4694**	**0.0000**	**2,207.5841**	**2,207.5841**	**0.7140**		**2,225.4336**

3.6 Paving - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0566	0.0361	0.5133	1.5900e-003	0.1677	1.2800e-003	0.1689	0.0445	1.1700e-003	0.0456		158.7723	158.7723	4.1000e-003		158.8748
Total	**0.0566**	**0.0361**	**0.5133**	**1.5900e-003**	**0.1677**	**1.2800e-003**	**0.1689**	**0.0445**	**1.1700e-003**	**0.0456**		**158.7723**	**158.7723**	**4.1000e-003**		**158.8748**

3.6 Paving - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9882	9.5246	14.6258	0.0228		0.4685	0.4685		0.4310	0.4310		2,207.5472	2,207.5472	0.7140		2,225.3963
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.9882**	**9.5246**	**14.6258**	**0.0228**		**0.4685**	**0.4685**		**0.4310**	**0.4310**		**2,207.5472**	**2,207.5472**	**0.7140**		**2,225.3963**

3.6 Paving - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0535	0.0329	0.4785	1.5400e-003	0.1677	1.2600e-003	0.1689	0.0445	1.1600e-003	0.0456		153.8517	153.8517	3.7600e-003		153.9458
Total	**0.0535**	**0.0329**	**0.4785**	**1.5400e-003**	**0.1677**	**1.2600e-003**	**0.1689**	**0.0445**	**1.1600e-003**	**0.0456**		**153.8517**	**153.8517**	**3.7600e-003**		**153.9458**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9882	9.5246	14.6258	0.0228		0.4685	0.4685		0.4310	0.4310	0.0000	2,207.5472	2,207.5472	0.7140		2,225.3963
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.9882**	**9.5246**	**14.6258**	**0.0228**		**0.4685**	**0.4685**		**0.4310**	**0.4310**	**0.0000**	**2,207.5472**	**2,207.5472**	**0.7140**		**2,225.3963**

3.6 Paving - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0535	0.0329	0.4785	1.5400e-003	0.1677	1.2600e-003	0.1689	0.0445	1.1600e-003	0.0456		153.8517	153.8517	3.7600e-003		153.9458
Total	**0.0535**	**0.0329**	**0.4785**	**1.5400e-003**	**0.1677**	**1.2600e-003**	**0.1689**	**0.0445**	**1.1600e-003**	**0.0456**		**153.8517**	**153.8517**	**3.7600e-003**		**153.9458**

3.7 Architectural Coating - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	236.4115					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609		281.4481	281.4481	0.0159		281.8443
Total	**236.5923**	**1.2188**	**1.8101**	**2.9700e-003**		**0.0609**	**0.0609**		**0.0609**	**0.0609**		**281.4481**	**281.4481**	**0.0159**		**281.8443**

3.7 Architectural Coating - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.5707	0.3513	5.1044	0.0165	1.7884	0.0134	1.8018	0.4743	0.0123	0.4866		1,641.0852	1,641.0852	0.0401		1,642.0886
Total	**0.5707**	**0.3513**	**5.1044**	**0.0165**	**1.7884**	**0.0134**	**1.8018**	**0.4743**	**0.0123**	**0.4866**		**1,641.0852**	**1,641.0852**	**0.0401**		**1,642.0886**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	236.4115					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609	0.0000	281.4481	281.4481	0.0159		281.8443
Total	**236.5923**	**1.2188**	**1.8101**	**2.9700e-003**		**0.0609**	**0.0609**		**0.0609**	**0.0609**	**0.0000**	**281.4481**	**281.4481**	**0.0159**		**281.8443**

3.7 Architectural Coating - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.5707	0.3513	5.1044	0.0165	1.7884	0.0134	1.8018	0.4743	0.0123	0.4866		1,641.0852	1,641.0852	0.0401		1,642.0886
Total	**0.5707**	**0.3513**	**5.1044**	**0.0165**	**1.7884**	**0.0134**	**1.8018**	**0.4743**	**0.0123**	**0.4866**		**1,641.0852**	**1,641.0852**	**0.0401**		**1,642.0886**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070		50,306.6034	50,306.6034	2.1807		50,361.1208
Unmitigated	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070		50,306.6034	50,306.6034	2.1807		50,361.1208

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Low Rise	145.75	154.25	154.00	506,227	506,227
Apartments Mid Rise	4,026.75	3,773.25	4075.50	13,660,065	13,660,065
General Office Building	288.45	62.55	31.05	706,812	706,812
High Turnover (Sit Down Restaurant)	2,368.80	2,873.52	2817.72	3,413,937	3,413,937
Hotel	192.00	187.50	160.00	445,703	445,703
Quality Restaurant	501.12	511.92	461.20	707,488	707,488
Regional Shopping Center	528.08	601.44	357.84	1,112,221	1,112,221
Total	8,050.95	8,164.43	8,057.31	20,552,452	20,552,452

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Low Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
Apartments Mid Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
General Office Building	16.60	8.40	6.90	33.00	48.00	19.00	77	19	4
High Turnover (Sit Down	16.60	8.40	6.90	8.50	72.50	19.00	37	20	43
Hotel	16.60	8.40	6.90	19.40	61.60	19.00	58	38	4
Quality Restaurant	16.60	8.40	6.90	12.00	69.00	19.00	38	18	44
Regional Shopping Center	16.60	8.40	6.90	16.30	64.70	19.00	54	35	11

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Apartments Mid Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
General Office Building	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
High Turnover (Sit Down Restaurant)	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Hotel	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Quality Restaurant	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Regional Shopping Center	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
NaturalGas Unmitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Low Rise	1119.16	0.0121	0.1031	0.0439	6.6000e-004		8.3400e-003	8.3400e-003		8.3400e-003	8.3400e-003		131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35784.3	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666		4,209.9164	4,209.9164	0.0807	0.0772	4,234.9339
General Office Building	1283.42	0.0138	0.1258	0.1057	7.5000e-004		9.5600e-003	9.5600e-003		9.5600e-003	9.5600e-003		150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22759.9	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696		2,677.6342	2,677.6342	0.0513	0.0491	2,693.5460
Hotel	4769.72	0.0514	0.4676	0.3928	2.8100e-003		0.0355	0.0355		0.0355	0.0355		561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5057.75	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377		595.0298	595.0298	0.0114	0.0109	598.5658
Regional Shopping Center	251.616	2.7100e-003	0.0247	0.0207	1.5000e-004		1.8700e-003	1.8700e-003		1.8700e-003	1.8700e-003		29.6019	29.6019	5.7000e-004	5.4000e-004	29.7778
Total		**0.7660**	**6.7463**	**4.2573**	**0.0418**		**0.5292**	**0.5292**		**0.5292**	**0.5292**		**8,355.9832**	**8,355.9832**	**0.1602**	**0.1532**	**8,405.6387**

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Low Rise	1.11916	0.0121	0.1031	0.0439	6.6000e-004		8.3400e-003	8.3400e-003		8.3400e-003	8.3400e-003		131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35.7843	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666		4,209.9164	4,209.9164	0.0807	0.0772	4,234.9339
General Office Building	1.28342	0.0138	0.1258	0.1057	7.5000e-004		9.5600e-003	9.5600e-003		9.5600e-003	9.5600e-003		150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22.7599	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696		2,677.6342	2,677.6342	0.0513	0.0491	2,693.5460
Hotel	4.76972	0.0514	0.4676	0.3928	2.8100e-003		0.0355	0.0355		0.0355	0.0355		561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5.05775	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377		595.0298	595.0298	0.0114	0.0109	598.5658
Regional Shopping Center	0.251616	2.7100e-003	0.0247	0.0207	1.5000e-004		1.8700e-003	1.8700e-003		1.8700e-003	1.8700e-003		29.6019	29.6019	5.7000e-004	5.4000e-004	29.7778
Total		**0.7660**	**6.7463**	**4.2573**	**0.0418**		**0.5292**	**0.5292**		**0.5292**	**0.5292**		**8,355.9832**	**8,355.9832**	**0.1602**	**0.1532**	**8,405.6387**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Unmitigated	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	2.2670					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	24.1085					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	1.6500	14.1000	6.0000	0.0900		1.1400	1.1400		1.1400	1.1400	0.0000	18,000.0000	18,000.0000	0.3450	0.3300	18,106.9650
Landscaping	2.4766	0.9496	82.4430	4.3600e-003		0.4574	0.4574		0.4574	0.4574		148.5950	148.5950	0.1424		152.1542
Total	**30.5020**	**15.0496**	**88.4430**	**0.0944**		**1.5974**	**1.5974**		**1.5974**	**1.5974**	**0.0000**	**18,148.5950**	**18,148.5950**	**0.4874**	**0.3300**	**18,259.1192**

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	2.2670					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	24.1085					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	1.6500	14.1000	6.0000	0.0900		1.1400	1.1400		1.1400	1.1400	0.0000	18,000.0000	18,000.0000	0.3450	0.3300	18,106.9650
Landscaping	2.4766	0.9496	82.4430	4.3600e-003		0.4574	0.4574		0.4574	0.4574		148.5950	148.5950	0.1424		152.1542
Total	**30.5020**	**15.0496**	**88.4430**	**0.0944**		**1.5974**	**1.5974**		**1.5974**	**1.5974**	**0.0000**	**18,148.5950**	**18,148.5950**	**0.4874**	**0.3300**	**18,259.1192**

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

Village South Specific Plan (Proposed)

Los Angeles-South Coast County, Winter

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Office Building	45.00	1000sqft	1.03	45,000.00	0
High Turnover (Sit Down Restaurant)	36.00	1000sqft	0.83	36,000.00	0
Hotel	50.00	Room	1.67	72,600.00	0
Quality Restaurant	8.00	1000sqft	0.18	8,000.00	0
Apartments Low Rise	25.00	Dwelling Unit	1.56	25,000.00	72
Apartments Mid Rise	975.00	Dwelling Unit	25.66	975,000.00	2789
Regional Shopping Center	56.00	1000sqft	1.29	56,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	33
Climate Zone	9			**Operational Year**	2028
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	702.44	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

Project Characteristics - Consistent with the DEIR's model.

Land Use - See SWAPE comment regarding residential and retail land uses.

Construction Phase - See SWAPE comment regarding individual construction phase lengths.

Demolition - Consistent with the DEIR's model. See SWAPE comment regarding demolition.

Vehicle Trips - Saturday trips consistent with the DEIR's model. See SWAPE comment regarding weekday and Sunday trips.

Woodstoves - Woodstoves and wood-burning fireplaces consistent with the DEIR's model. See SWAPE comment regarding gas fireplaces.

Energy Use -

Construction Off-road Equipment Mitigation - See SWAPE comment on construction-related mitigation.

Area Mitigation - See SWAPE comment regarding operational mitigation measures.

Water Mitigation - See SWAPE comment regarding operational mitigation measures.

Table Name	Column Name	Default Value	New Value
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	NumberWood	1.25	0.00
tblFireplaces	NumberWood	48.75	0.00
tblVehicleTrips	ST_TR	7.16	6.17
tblVehicleTrips	ST_TR	6.39	3.87
tblVehicleTrips	ST_TR	2.46	1.39
tblVehicleTrips	ST_TR	158.37	79.82
tblVehicleTrips	ST_TR	8.19	3.75
tblVehicleTrips	ST_TR	94.36	63.99
tblVehicleTrips	ST_TR	49.97	10.74
tblVehicleTrips	SU_TR	6.07	6.16
tblVehicleTrips	SU_TR	5.86	4.18
tblVehicleTrips	SU_TR	1.05	0.69
tblVehicleTrips	SU_TR	131.84	78.27

tblVehicleTrips	SU_TR	5.95	3.20
tblVehicleTrips	SU_TR	72.16	57.65
tblVehicleTrips	SU_TR	25.24	6.39
tblVehicleTrips	WD_TR	6.59	5.83
tblVehicleTrips	WD_TR	6.65	4.13
tblVehicleTrips	WD_TR	11.03	6.41
tblVehicleTrips	WD_TR	127.15	65.80
tblVehicleTrips	WD_TR	8.17	3.84
tblVehicleTrips	WD_TR	89.95	62.64
tblVehicleTrips	WD_TR	42.70	9.43
tblWoodstoves	NumberCatalytic	1.25	0.00
tblWoodstoves	NumberCatalytic	48.75	0.00
tblWoodstoves	NumberNoncatalytic	1.25	0.00
tblWoodstoves	NumberNoncatalytic	48.75	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	4.2865	46.4651	31.6150	0.0642	18.2675	2.0461	20.3135	9.9840	1.8824	11.8664	0.0000	6,221.4937	6,221.4937	1.9491	0.0000	6,270.2214
2022	5.7218	38.9024	47.3319	0.1455	9.8688	1.6366	10.7736	3.6558	1.5057	5.1615	0.0000	14,630.3099	14,630.3099	1.9499	0.0000	14,657.2663
2023	5.2705	26.4914	44.5936	0.1413	9.8688	0.7800	10.6488	2.6381	0.7328	3.3708	0.0000	14,210.3424	14,210.3424	1.0230	0.0000	14,235.9160
2024	237.2328	9.5610	15.0611	0.0243	1.7884	0.4698	1.8628	0.4743	0.4322	0.5476	0.0000	2,352.4178	2,352.4178	0.7175	0.0000	2,370.3550
Maximum	**237.2328**	**46.4651**	**47.3319**	**0.1455**	**18.2675**	**2.0461**	**20.3135**	**9.9840**	**1.8824**	**11.8664**	**0.0000**	**14,630.3099**	**14,630.3099**	**1.9499**	**0.0000**	**14,657.2663**

2.1 Overall Construction (Maximum Daily Emission)

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	4.2865	46.4651	31.6150	0.0642	18.2675	2.0461	20.3135	9.9840	1.8824	11.8664	0.0000	6,221.4937	6,221.4937	1.9491	0.0000	6,270.2214
2022	5.7218	38.9024	47.3319	0.1455	9.8688	1.6366	10.7736	3.6558	1.5057	5.1615	0.0000	14,630.3099	14,630.3099	1.9499	0.0000	14,657.2663
2023	5.2705	26.4914	44.5936	0.1413	9.8688	0.7800	10.6488	2.6381	0.7328	3.3708	0.0000	14,210.3424	14,210.3424	1.0230	0.0000	14,235.9160
2024	237.2328	9.5610	15.0611	0.0243	1.7884	0.4698	1.8628	0.4743	0.4322	0.5476	0.0000	2,352.4178	2,352.4178	0.7175	0.0000	2,370.3550
Maximum	**237.2328**	**46.4651**	**47.3319**	**0.1455**	**18.2675**	**2.0461**	**20.3135**	**9.9840**	**1.8824**	**11.8664**	**0.0000**	**14,630.3099**	**14,630.3099**	**1.9499**	**0.0000**	**14,657.2663**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Energy	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
Mobile	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083		47,917.8005	47,917.8005	2.1953		47,972.6839
Total	**40.7912**	**67.7872**	**202.7424**	**0.6043**	**45.9592**	**2.4640**	**48.4231**	**12.2950**	**2.4399**	**14.7349**	**0.0000**	**74,422.3787**	**74,422.3787**	**2.8429**	**0.4832**	**74,637.4417**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Energy	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
Mobile	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083		47,917.8005	47,917.8005	2.1953		47,972.6839
Total	**40.7912**	**67.7872**	**202.7424**	**0.6043**	**45.9592**	**2.4640**	**48.4231**	**12.2950**	**2.4399**	**14.7349**	**0.0000**	**74,422.3787**	**74,422.3787**	**2.8429**	**0.4832**	**74,637.4417**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	9/1/2021	10/12/2021	5	30	
2	Site Preparation	Site Preparation	10/13/2021	11/9/2021	5	20	
3	Grading	Grading	11/10/2021	1/11/2022	5	45	
4	Building Construction	Building Construction	1/12/2022	12/12/2023	5	500	
5	Paving	Paving	12/13/2023	1/30/2024	5	35	
6	Architectural Coating	Architectural Coating	1/31/2024	3/19/2024	5	35	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 112.5

Acres of Paving: 0

Residential Indoor: 2,025,000; Residential Outdoor: 675,000; Non-Residential Indoor: 326,400; Non-Residential Outdoor: 108,800; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	458.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	7	18.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	801.00	143.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	160.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					3.3074	0.0000	3.3074	0.5008	0.0000	0.5008			0.0000			0.0000
Off-Road	3.1651	31.4407	21.5650	0.0388		1.5513	1.5513		1.4411	1.4411		3,747.9449	3,747.9449	1.0549		3,774.3174
Total	**3.1651**	**31.4407**	**21.5650**	**0.0388**	**3.3074**	**1.5513**	**4.8588**	**0.5008**	**1.4411**	**1.9419**		**3,747.9449**	**3,747.9449**	**1.0549**		**3,774.3174**

3.2 Demolition - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1304	4.1454	1.0182	0.0117	0.2669	0.0128	0.2797	0.0732	0.0122	0.0854		1,269.8555	1,269.8555	0.0908		1,272.1252
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0715	0.0489	0.5524	1.6100e-003	0.1677	1.3500e-003	0.1690	0.0445	1.2500e-003	0.0457		160.8377	160.8377	4.7300e-003		160.9560
Total	**0.2019**	**4.1943**	**1.5706**	**0.0133**	**0.4346**	**0.0141**	**0.4487**	**0.1176**	**0.0135**	**0.1311**		**1,430.6932**	**1,430.6932**	**0.0955**		**1,433.0812**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					3.3074	0.0000	3.3074	0.5008	0.0000	0.5008			0.0000			0.0000
Off-Road	3.1651	31.4407	21.5650	0.0388		1.5513	1.5513		1.4411	1.4411	0.0000	3,747.9449	3,747.9449	1.0549		3,774.3174
Total	**3.1651**	**31.4407**	**21.5650**	**0.0388**	**3.3074**	**1.5513**	**4.8588**	**0.5008**	**1.4411**	**1.9419**	**0.0000**	**3,747.9449**	**3,747.9449**	**1.0549**		**3,774.3174**

3.2 Demolition - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1304	4.1454	1.0182	0.0117	0.2669	0.0128	0.2797	0.0732	0.0122	0.0854		1,269.8555	1,269.8555	0.0908		1,272.1252
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0715	0.0489	0.5524	1.6100e-003	0.1677	1.3500e-003	0.1690	0.0445	1.2500e-003	0.0457		160.8377	160.8377	4.7300e-003		160.9560
Total	**0.2019**	**4.1943**	**1.5706**	**0.0133**	**0.4346**	**0.0141**	**0.4487**	**0.1176**	**0.0135**	**0.1311**		**1,430.6932**	**1,430.6932**	**0.0955**		**1,433.0812**

3.3 Site Preparation - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809		3,685.6569	3,685.6569	1.1920		3,715.4573
Total	**3.8882**	**40.4971**	**21.1543**	**0.0380**	**18.0663**	**2.0445**	**20.1107**	**9.9307**	**1.8809**	**11.8116**		**3,685.6569**	**3,685.6569**	**1.1920**		**3,715.4573**

3.3 Site Preparation - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0858	0.0587	0.6629	1.9400e-003	0.2012	1.6300e-003	0.2028	0.0534	1.5000e-003	0.0549		193.0052	193.0052	5.6800e-003		193.1472
Total	**0.0858**	**0.0587**	**0.6629**	**1.9400e-003**	**0.2012**	**1.6300e-003**	**0.2028**	**0.0534**	**1.5000e-003**	**0.0549**		**193.0052**	**193.0052**	**5.6800e-003**		**193.1472**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809	0.0000	3,685.6569	3,685.6569	1.1920		3,715.4573
Total	**3.8882**	**40.4971**	**21.1543**	**0.0380**	**18.0663**	**2.0445**	**20.1107**	**9.9307**	**1.8809**	**11.8116**	**0.0000**	**3,685.6569**	**3,685.6569**	**1.1920**		**3,715.4573**

3.3 Site Preparation - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0858	0.0587	0.6629	1.9400e-003	0.2012	1.6300e-003	0.2028	0.0534	1.5000e-003	0.0549		193.0052	193.0052	5.6800e-003		193.1472
Total	**0.0858**	**0.0587**	**0.6629**	**1.9400e-003**	**0.2012**	**1.6300e-003**	**0.2028**	**0.0534**	**1.5000e-003**	**0.0549**		**193.0052**	**193.0052**	**5.6800e-003**		**193.1472**

3.4 Grading - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620		1.9853	1.9853		1.8265	1.8265		6,007.0434	6,007.0434	1.9428		6,055.6134
Total	**4.1912**	**46.3998**	**30.8785**	**0.0620**	**8.6733**	**1.9853**	**10.6587**	**3.5965**	**1.8265**	**5.4230**		**6,007.0434**	**6,007.0434**	**1.9428**		**6,055.6134**

3.4 Grading - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0954	0.0652	0.7365	2.1500e-003	0.2236	1.8100e-003	0.2254	0.0593	1.6600e-003	0.0610		214.4502	214.4502	6.3100e-003		214.6080
Total	**0.0954**	**0.0652**	**0.7365**	**2.1500e-003**	**0.2236**	**1.8100e-003**	**0.2254**	**0.0593**	**1.6600e-003**	**0.0610**		**214.4502**	**214.4502**	**6.3100e-003**		**214.6080**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620		1.9853	1.9853		1.8265	1.8265	0.0000	6,007.0434	6,007.0434	1.9428		6,055.6134
Total	**4.1912**	**46.3998**	**30.8785**	**0.0620**	**8.6733**	**1.9853**	**10.6587**	**3.5965**	**1.8265**	**5.4230**	**0.0000**	**6,007.0434**	**6,007.0434**	**1.9428**		**6,055.6134**

3.4 Grading - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0954	0.0652	0.7365	2.1500e-003	0.2236	1.8100e-003	0.2254	0.0593	1.6600e-003	0.0610		214.4502	214.4502	6.3100e-003		214.6080
Total	**0.0954**	**0.0652**	**0.7365**	**2.1500e-003**	**0.2236**	**1.8100e-003**	**0.2254**	**0.0593**	**1.6600e-003**	**0.0610**		**214.4502**	**214.4502**	**6.3100e-003**		**214.6080**

3.4 Grading - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	3.6248	38.8435	29.0415	0.0621		1.6349	1.6349		1.5041	1.5041		6,011.4105	6,011.4105	1.9442		6,060.0158
Total	**3.6248**	**38.8435**	**29.0415**	**0.0621**	**8.6733**	**1.6349**	**10.3082**	**3.5965**	**1.5041**	**5.1006**		**6,011.4105**	**6,011.4105**	**1.9442**		**6,060.0158**

3.4 Grading - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0896	0.0589	0.6784	2.0800e-003	0.2236	1.7500e-003	0.2253	0.0593	1.6100e-003	0.0609		206.9139	206.9139	5.7000e-003		207.0563
Total	**0.0896**	**0.0589**	**0.6784**	**2.0800e-003**	**0.2236**	**1.7500e-003**	**0.2253**	**0.0593**	**1.6100e-003**	**0.0609**		**206.9139**	**206.9139**	**5.7000e-003**		**207.0563**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	3.6248	38.8435	29.0415	0.0621		1.6349	1.6349		1.5041	1.5041	0.0000	6,011.4105	6,011.4105	1.9442		6,060.0158
Total	**3.6248**	**38.8435**	**29.0415**	**0.0621**	**8.6733**	**1.6349**	**10.3082**	**3.5965**	**1.5041**	**5.1006**	**0.0000**	**6,011.4105**	**6,011.4105**	**1.9442**		**6,060.0158**

3.4 Grading - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0896	0.0589	0.6784	2.0800e-003	0.2236	1.7500e-003	0.2253	0.0593	1.6100e-003	0.0609		206.9139	206.9139	5.7000e-003		207.0563
Total	**0.0896**	**0.0589**	**0.6784**	**2.0800e-003**	**0.2236**	**1.7500e-003**	**0.2253**	**0.0593**	**1.6100e-003**	**0.0609**		**206.9139**	**206.9139**	**5.7000e-003**		**207.0563**

3.5 Building Construction - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.7062	15.6156	16.3634	0.0269		0.8090	0.8090		0.7612	0.7612		2,554.3336	2,554.3336	0.6120		2,569.6322
Total	**1.7062**	**15.6156**	**16.3634**	**0.0269**		**0.8090**	**0.8090**		**0.7612**	**0.7612**		**2,554.3336**	**2,554.3336**	**0.6120**		**2,569.6322**

3.5 Building Construction - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.4284	13.1673	3.8005	0.0354	0.9155	0.0256	0.9412	0.2636	0.0245	0.2881		3,789.0750	3,789.0750	0.2381		3,795.0283
Worker	3.5872	2.3593	27.1680	0.0832	8.9533	0.0701	9.0234	2.3745	0.0646	2.4390		8,286.9013	8,286.9013	0.2282		8,292.6058
Total	**4.0156**	**15.5266**	**30.9685**	**0.1186**	**9.8688**	**0.0957**	**9.9645**	**2.6381**	**0.0891**	**2.7271**		**12,075.9763**	**12,075.9763**	**0.4663**		**12,087.6341**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.7062	15.6156	16.3634	0.0269		0.8090	0.8090		0.7612	0.7612	0.0000	2,554.3336	2,554.3336	0.6120		2,569.6322
Total	**1.7062**	**15.6156**	**16.3634**	**0.0269**		**0.8090**	**0.8090**		**0.7612**	**0.7612**	**0.0000**	**2,554.3336**	**2,554.3336**	**0.6120**		**2,569.6322**

3.5 Building Construction - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.4284	13.1673	3.8005	0.0354	0.9155	0.0256	0.9412	0.2636	0.0245	0.2881		3,789.0750	3,789.0750	0.2381		3,795.0283
Worker	3.5872	2.3593	27.1680	0.0832	8.9533	0.0701	9.0234	2.3745	0.0646	2.4390		8,286.9013	8,286.9013	0.2282		8,292.6058
Total	**4.0156**	**15.5266**	**30.9685**	**0.1186**	**9.8688**	**0.0957**	**9.9645**	**2.6381**	**0.0891**	**2.7271**		**12,075.9763**	**12,075.9763**	**0.4663**		**12,087.6341**

3.5 Building Construction - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584		2,555.2099	2,555.2099	0.6079		2,570.4061
Total	**1.5728**	**14.3849**	**16.2440**	**0.0269**		**0.6997**	**0.6997**		**0.6584**	**0.6584**		**2,555.2099**	**2,555.2099**	**0.6079**		**2,570.4061**

3.5 Building Construction - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.3183	9.9726	3.3771	0.0343	0.9156	0.0122	0.9277	0.2636	0.0116	0.2752		3,671.4007	3,671.4007	0.2096		3,676.6417
Worker	3.3795	2.1338	24.9725	0.0801	8.9533	0.0681	9.0214	2.3745	0.0627	2.4372		7,983.7318	7,983.7318	0.2055		7,988.8683
Total	**3.6978**	**12.1065**	**28.3496**	**0.1144**	**9.8688**	**0.0803**	**9.9491**	**2.6381**	**0.0743**	**2.7124**		**11,655.1325**	**11,655.1325**	**0.4151**		**11,665.5099**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584	0.0000	2,555.2099	2,555.2099	0.6079		2,570.4061
Total	**1.5728**	**14.3849**	**16.2440**	**0.0269**		**0.6997**	**0.6997**		**0.6584**	**0.6584**	**0.0000**	**2,555.2099**	**2,555.2099**	**0.6079**		**2,570.4061**

3.5 Building Construction - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.3183	9.9726	3.3771	0.0343	0.9156	0.0122	0.9277	0.2636	0.0116	0.2752		3,671.4007	3,671.4007	0.2096		3,676.6417
Worker	3.3795	2.1338	24.9725	0.0801	8.9533	0.0681	9.0214	2.3745	0.0627	2.4372		7,983.7318	7,983.7318	0.2055		7,988.8683
Total	**3.6978**	**12.1065**	**28.3496**	**0.1144**	**9.8688**	**0.0803**	**9.9491**	**2.6381**	**0.0743**	**2.7124**		**11,655.1325**	**11,655.1325**	**0.4151**		**11,665.5099**

3.6 Paving - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.0327	10.1917	14.5842	0.0228		0.5102	0.5102		0.4694	0.4694		2,207.5841	2,207.5841	0.7140		2,225.4336
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.0327**	**10.1917**	**14.5842**	**0.0228**		**0.5102**	**0.5102**		**0.4694**	**0.4694**		**2,207.5841**	**2,207.5841**	**0.7140**		**2,225.4336**

3.6 Paving - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0633	0.0400	0.4677	1.5000e-003	0.1677	1.2800e-003	0.1689	0.0445	1.1700e-003	0.0456		149.5081	149.5081	3.8500e-003		149.6043
Total	**0.0633**	**0.0400**	**0.4677**	**1.5000e-003**	**0.1677**	**1.2800e-003**	**0.1689**	**0.0445**	**1.1700e-003**	**0.0456**		**149.5081**	**149.5081**	**3.8500e-003**		**149.6043**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.0327	10.1917	14.5842	0.0228		0.5102	0.5102		0.4694	0.4694	0.0000	2,207.5841	2,207.5841	0.7140		2,225.4336
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.0327**	**10.1917**	**14.5842**	**0.0228**		**0.5102**	**0.5102**		**0.4694**	**0.4694**	**0.0000**	**2,207.5841**	**2,207.5841**	**0.7140**		**2,225.4336**

3.6 Paving - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0633	0.0400	0.4677	1.5000e-003	0.1677	1.2800e-003	0.1689	0.0445	1.1700e-003	0.0456		149.5081	149.5081	3.8500e-003		149.6043
Total	**0.0633**	**0.0400**	**0.4677**	**1.5000e-003**	**0.1677**	**1.2800e-003**	**0.1689**	**0.0445**	**1.1700e-003**	**0.0456**		**149.5081**	**149.5081**	**3.8500e-003**		**149.6043**

3.6 Paving - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9882	9.5246	14.6258	0.0228		0.4685	0.4685		0.4310	0.4310		2,207.5472	2,207.5472	0.7140		2,225.3963
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.9882**	**9.5246**	**14.6258**	**0.0228**		**0.4685**	**0.4685**		**0.4310**	**0.4310**		**2,207.5472**	**2,207.5472**	**0.7140**		**2,225.3963**

3.6 Paving - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0601	0.0364	0.4354	1.4500e-003	0.1677	1.2600e-003	0.1689	0.0445	1.1600e-003	0.0456		144.8706	144.8706	3.5300e-003		144.9587
Total	**0.0601**	**0.0364**	**0.4354**	**1.4500e-003**	**0.1677**	**1.2600e-003**	**0.1689**	**0.0445**	**1.1600e-003**	**0.0456**		**144.8706**	**144.8706**	**3.5300e-003**		**144.9587**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9882	9.5246	14.6258	0.0228		0.4685	0.4685		0.4310	0.4310	0.0000	2,207.5472	2,207.5472	0.7140		2,225.3963
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.9882**	**9.5246**	**14.6258**	**0.0228**		**0.4685**	**0.4685**		**0.4310**	**0.4310**	**0.0000**	**2,207.5472**	**2,207.5472**	**0.7140**		**2,225.3963**

3.6 Paving - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0601	0.0364	0.4354	1.4500e-003	0.1677	1.2600e-003	0.1689	0.0445	1.1600e-003	0.0456		144.8706	144.8706	3.5300e-003		144.9587
Total	**0.0601**	**0.0364**	**0.4354**	**1.4500e-003**	**0.1677**	**1.2600e-003**	**0.1689**	**0.0445**	**1.1600e-003**	**0.0456**		**144.8706**	**144.8706**	**3.5300e-003**		**144.9587**

3.7 Architectural Coating - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	236.4115					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609		281.4481	281.4481	0.0159		281.8443
Total	**236.5923**	**1.2188**	**1.8101**	**2.9700e-003**		**0.0609**	**0.0609**		**0.0609**	**0.0609**		**281.4481**	**281.4481**	**0.0159**		**281.8443**

3.7 Architectural Coating - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.6406	0.3886	4.6439	0.0155	1.7884	0.0134	1.8018	0.4743	0.0123	0.4866		1,545.2860	1,545.2860	0.0376		1,546.2262
Total	**0.6406**	**0.3886**	**4.6439**	**0.0155**	**1.7884**	**0.0134**	**1.8018**	**0.4743**	**0.0123**	**0.4866**		**1,545.2860**	**1,545.2860**	**0.0376**		**1,546.2262**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	236.4115					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609	0.0000	281.4481	281.4481	0.0159		281.8443
Total	**236.5923**	**1.2188**	**1.8101**	**2.9700e-003**		**0.0609**	**0.0609**		**0.0609**	**0.0609**	**0.0000**	**281.4481**	**281.4481**	**0.0159**		**281.8443**

3.7 Architectural Coating - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.6406	0.3886	4.6439	0.0155	1.7884	0.0134	1.8018	0.4743	0.0123	0.4866		1,545.2860	1,545.2860	0.0376		1,546.2262
Total	**0.6406**	**0.3886**	**4.6439**	**0.0155**	**1.7884**	**0.0134**	**1.8018**	**0.4743**	**0.0123**	**0.4866**		**1,545.2860**	**1,545.2860**	**0.0376**		**1,546.2262**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083		47,917.8005	47,917.8005	2.1953		47,972.6839
Unmitigated	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083		47,917.8005	47,917.8005	2.1953		47,972.6839

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Low Rise	145.75	154.25	154.00	506,227	506,227
Apartments Mid Rise	4,026.75	3,773.25	4075.50	13,660,065	13,660,065
General Office Building	288.45	62.55	31.05	706,812	706,812
High Turnover (Sit Down Restaurant)	2,368.80	2,873.52	2817.72	3,413,937	3,413,937
Hotel	192.00	187.50	160.00	445,703	445,703
Quality Restaurant	501.12	511.92	461.20	707,488	707,488
Regional Shopping Center	528.08	601.44	357.84	1,112,221	1,112,221
Total	8,050.95	8,164.43	8,057.31	20,552,452	20,552,452

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Low Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
Apartments Mid Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
General Office Building	16.60	8.40	6.90	33.00	48.00	19.00	77	19	4
High Turnover (Sit Down	16.60	8.40	6.90	8.50	72.50	19.00	37	20	43
Hotel	16.60	8.40	6.90	19.40	61.60	19.00	58	38	4
Quality Restaurant	16.60	8.40	6.90	12.00	69.00	19.00	38	18	44
Regional Shopping Center	16.60	8.40	6.90	16.30	64.70	19.00	54	35	11

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Apartments Mid Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
General Office Building	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
High Turnover (Sit Down Restaurant)	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Hotel	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Quality Restaurant	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Regional Shopping Center	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
NaturalGas Unmitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Low Rise	1119.16	0.0121	0.1031	0.0439	6.6000e-004		8.3400e-003	8.3400e-003		8.3400e-003	8.3400e-003		131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35784.3	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666		4,209.9164	4,209.9164	0.0807	0.0772	4,234.9339
General Office Building	1283.42	0.0138	0.1258	0.1057	7.5000e-004		9.5600e-003	9.5600e-003		9.5600e-003	9.5600e-003		150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22759.9	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696		2,677.6342	2,677.6342	0.0513	0.0491	2,693.5460
Hotel	4769.72	0.0514	0.4676	0.3928	2.8100e-003		0.0355	0.0355		0.0355	0.0355		561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5057.75	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377		595.0298	595.0298	0.0114	0.0109	598.5658
Regional Shopping Center	251.616	2.7100e-003	0.0247	0.0207	1.5000e-004		1.8700e-003	1.8700e-003		1.8700e-003	1.8700e-003		29.6019	29.6019	5.7000e-004	5.4000e-004	29.7778
Total		**0.7660**	**6.7463**	**4.2573**	**0.0418**		**0.5292**	**0.5292**		**0.5292**	**0.5292**		**8,355.9832**	**8,355.9832**	**0.1602**	**0.1532**	**8,405.6387**

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Low Rise	1.11916	0.0121	0.1031	0.0439	6.6000e-004		8.3400e-003	8.3400e-003		8.3400e-003	8.3400e-003		131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35.7843	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666		4,209.9164	4,209.9164	0.0807	0.0772	4,234.9339
General Office Building	1.28342	0.0138	0.1258	0.1057	7.5000e-004		9.5600e-003	9.5600e-003		9.5600e-003	9.5600e-003		150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22.7599	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696		2,677.6342	2,677.6342	0.0513	0.0491	2,693.5460
Hotel	4.76972	0.0514	0.4676	0.3928	2.8100e-003		0.0355	0.0355		0.0355	0.0355		561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5.05775	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377		595.0298	595.0298	0.0114	0.0109	598.5658
Regional Shopping Center	0.251616	2.7100e-003	0.0247	0.0207	1.5000e-004		1.8700e-003	1.8700e-003		1.8700e-003	1.8700e-003		29.6019	29.6019	5.7000e-004	5.4000e-004	29.7778
Total		**0.7660**	**6.7463**	**4.2573**	**0.0418**		**0.5292**	**0.5292**		**0.5292**	**0.5292**		**8,355.9832**	**8,355.9832**	**0.1602**	**0.1532**	**8,405.6387**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Unmitigated	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	2.2670					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	24.1085					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	1.6500	14.1000	6.0000	0.0900		1.1400	1.1400		1.1400	1.1400	0.0000	18,000.0000	18,000.0000	0.3450	0.3300	18,106.9650
Landscaping	2.4766	0.9496	82.4430	4.3600e-003		0.4574	0.4574		0.4574	0.4574		148.5950	148.5950	0.1424		152.1542
Total	**30.5020**	**15.0496**	**88.4430**	**0.0944**		**1.5974**	**1.5974**		**1.5974**	**1.5974**	**0.0000**	**18,148.5950**	**18,148.5950**	**0.4874**	**0.3300**	**18,259.1192**

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	2.2670					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	24.1085					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	1.6500	14.1000	6.0000	0.0900		1.1400	1.1400		1.1400	1.1400	0.0000	18,000.0000	18,000.0000	0.3450	0.3300	18,106.9650
Landscaping	2.4766	0.9496	82.4430	4.3600e-003		0.4574	0.4574		0.4574	0.4574		148.5950	148.5950	0.1424		152.1542
Total	**30.5020**	**15.0496**	**88.4430**	**0.0944**		**1.5974**	**1.5974**		**1.5974**	**1.5974**	**0.0000**	**18,148.5950**	**18,148.5950**	**0.4874**	**0.3300**	**18,259.1192**

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

Village South Specific Plan (Proposed)

Los Angeles-South Coast County, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Office Building	45.00	1000sqft	1.03	45,000.00	0
High Turnover (Sit Down Restaurant)	36.00	1000sqft	0.83	36,000.00	0
Hotel	50.00	Room	1.67	72,600.00	0
Quality Restaurant	8.00	1000sqft	0.18	8,000.00	0
Apartments Low Rise	25.00	Dwelling Unit	1.56	25,000.00	72
Apartments Mid Rise	975.00	Dwelling Unit	25.66	975,000.00	2789
Regional Shopping Center	56.00	1000sqft	1.29	56,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	33
Climate Zone	9			**Operational Year**	2028
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	702.44	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

Project Characteristics - Consistent with the DEIR's model.

Land Use - See SWAPE comment regarding residential and retail land uses.

Construction Phase - See SWAPE comment regarding individual construction phase lengths.

Demolition - Consistent with the DEIR's model. See SWAPE comment regarding demolition.

Vehicle Trips - Saturday trips consistent with the DEIR's model. See SWAPE comment regarding weekday and Sunday trips.

Woodstoves - Woodstoves and wood-burning fireplaces consistent with the DEIR's model. See SWAPE comment regarding gas fireplaces.

Energy Use -

Construction Off-road Equipment Mitigation - See SWAPE comment on construction-related mitigation.

Area Mitigation - See SWAPE comment regarding operational mitigation measures.

Water Mitigation - See SWAPE comment regarding operational mitigation measures.

Trips and VMT - Local hire provision

Table Name	Column Name	Default Value	New Value
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	NumberWood	1.25	0.00
tblFireplaces	NumberWood	48.75	0.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblVehicleTrips	ST_TR	7.16	6.17
tblVehicleTrips	ST_TR	6.39	3.87
tblVehicleTrips	ST_TR	2.46	1.39
tblVehicleTrips	ST_TR	158.37	79.82

tblVehicleTrips	ST_TR	8.19	3.75
tblVehicleTrips	ST_TR	94.36	63.99
tblVehicleTrips	ST_TR	49.97	10.74
tblVehicleTrips	SU_TR	6.07	6.16
tblVehicleTrips	SU_TR	5.86	4.18
tblVehicleTrips	SU_TR	1.05	0.69
tblVehicleTrips	SU_TR	131.84	78.27
tblVehicleTrips	SU_TR	5.95	3.20
tblVehicleTrips	SU_TR	72.16	57.65
tblVehicleTrips	SU_TR	25.24	6.39
tblVehicleTrips	WD_TR	6.59	5.83
tblVehicleTrips	WD_TR	6.65	4.13
tblVehicleTrips	WD_TR	11.03	6.41
tblVehicleTrips	WD_TR	127.15	65.80
tblVehicleTrips	WD_TR	8.17	3.84
tblVehicleTrips	WD_TR	89.95	62.64
tblVehicleTrips	WD_TR	42.70	9.43
tblWoodstoves	NumberCatalytic	1.25	0.00
tblWoodstoves	NumberCatalytic	48.75	0.00
tblWoodstoves	NumberNoncatalytic	1.25	0.00
tblWoodstoves	NumberNoncatalytic	48.75	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00

2.0 Emissions Summary

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2021	0.1704	1.8234	1.1577	2.3800e-003	0.4141	0.0817	0.4958	0.1788	0.0754	0.2542	0.0000	210.7654	210.7654	0.0600	0.0000	212.2661
2022	0.5865	4.0240	5.1546	0.0155	0.9509	0.1175	1.0683	0.2518	0.1103	0.3621	0.0000	1,418.6554	1,418.6554	0.1215	0.0000	1,421.6925
2023	0.5190	3.2850	4.7678	0.0147	0.8497	0.0971	0.9468	0.2283	0.0912	0.3195	0.0000	1,342.4412	1,342.4412	0.1115	0.0000	1,345.2291
2024	4.1592	0.1313	0.2557	5.0000e-004	0.0221	6.3900e-003	0.0285	5.8700e-003	5.9700e-003	0.0118	0.0000	44.6355	44.6355	7.8300e-003	0.0000	44.8311
Maximum	**4.1592**	**4.0240**	**5.1546**	**0.0155**	**0.9509**	**0.1175**	**1.0683**	**0.2518**	**0.1103**	**0.3621**	**0.0000**	**1,418.6554**	**1,418.6554**	**0.1215**	**0.0000**	**1,421.6925**

2.1 Overall Construction

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2021	0.1704	1.8234	1.1577	2.3800e-003	0.4141	0.0817	0.4958	0.1788	0.0754	0.2542	0.0000	210.7651	210.7651	0.0600	0.0000	212.2658
2022	0.5865	4.0240	5.1546	0.0155	0.9509	0.1175	1.0683	0.2518	0.1103	0.3621	0.0000	1,418.6550	1,418.6550	0.1215	0.0000	1,421.6921
2023	0.5190	3.2850	4.7678	0.0147	0.8497	0.0971	0.9468	0.2283	0.0912	0.3195	0.0000	1,342.4409	1,342.4409	0.1115	0.0000	1,345.2287
2024	4.1592	0.1313	0.2557	5.0000e-004	0.0221	6.3900e-003	0.0285	5.8700e-003	5.9700e-003	0.0118	0.0000	44.6354	44.6354	7.8300e-003	0.0000	44.8311
Maximum	**4.1592**	**4.0240**	**5.1546**	**0.0155**	**0.9509**	**0.1175**	**1.0683**	**0.2518**	**0.1103**	**0.3621**	**0.0000**	**1,418.6550**	**1,418.6550**	**0.1215**	**0.0000**	**1,421.6921**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	**9-1-2021**	**11-30-2021**	1.4091	1.4091
2	**12-1-2021**	**2-28-2022**	1.3329	1.3329
3	**3-1-2022**	**5-31-2022**	1.1499	1.1499
4	**6-1-2022**	**8-31-2022**	1.1457	1.1457
5	**9-1-2022**	**11-30-2022**	1.1415	1.1415
6	**12-1-2022**	**2-28-2023**	1.0278	1.0278
7	**3-1-2023**	**5-31-2023**	0.9868	0.9868
8	**6-1-2023**	**8-31-2023**	0.9831	0.9831

9	**9-1-2023**	**11-30-2023**	0.9798	0.9798
10	**12-1-2023**	**2-29-2024**	2.8757	2.8757
11	**3-1-2024**	**5-31-2024**	1.6188	1.6188
		Highest	2.8757	2.8757

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	5.1437	0.2950	10.3804	1.6700e-003		0.0714	0.0714		0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835
Energy	0.1398	1.2312	0.7770	7.6200e-003		0.0966	0.0966		0.0966	0.0966	0.0000	3,896.0732	3,896.0732	0.1303	0.0468	3,913.2833
Mobile	1.5857	7.9962	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620.4986	7,620.4986	0.3407	0.0000	7,629.0162
Waste						0.0000	0.0000		0.0000	0.0000	207.8079	0.0000	207.8079	12.2811	0.0000	514.8354
Water						0.0000	0.0000		0.0000	0.0000	29.1632	556.6420	585.8052	3.0183	0.0755	683.7567
Total	**6.8692**	**9.5223**	**30.3407**	**0.0914**	**7.7979**	**0.2260**	**8.0240**	**2.0895**	**0.2219**	**2.3114**	**236.9712**	**12,294.1807**	**12,531.1519**	**15.7904**	**0.1260**	**12,963.4751**

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	5.1437	0.2950	10.3804	1.6700e-003		0.0714	0.0714		0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835
Energy	0.1398	1.2312	0.7770	7.6200e-003		0.0966	0.0966		0.0966	0.0966	0.0000	3,896.0732	3,896.0732	0.1303	0.0468	3,913.2833
Mobile	1.5857	7.9962	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620.4986	7,620.4986	0.3407	0.0000	7,629.0162
Waste						0.0000	0.0000		0.0000	0.0000	207.8079	0.0000	207.8079	12.2811	0.0000	514.8354
Water						0.0000	0.0000		0.0000	0.0000	29.1632	556.6420	585.8052	3.0183	0.0755	683.7567
Total	**6.8692**	**9.5223**	**30.3407**	**0.0914**	**7.7979**	**0.2260**	**8.0240**	**2.0895**	**0.2219**	**2.3114**	**236.9712**	**12,294.1807**	**12,531.1519**	**15.7904**	**0.1260**	**12,963.4751**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	9/1/2021	10/12/2021	5	30	
2	Site Preparation	Site Preparation	10/13/2021	11/9/2021	5	20	
3	Grading	Grading	11/10/2021	1/11/2022	5	45	
4	Building Construction	Building Construction	1/12/2022	12/12/2023	5	500	
5	Paving	Paving	12/13/2023	1/30/2024	5	35	
6	Architectural Coating	Architectural Coating	1/31/2024	3/19/2024	5	35	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 112.5

Acres of Paving: 0

Residential Indoor: 2,025,000; Residential Outdoor: 675,000; Non-Residential Indoor: 326,400; Non-Residential Outdoor: 108,800; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	458.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	7	18.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	801.00	143.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	160.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0496	0.0000	0.0496	7.5100e-003	0.0000	7.5100e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0475	0.4716	0.3235	5.8000e-004		0.0233	0.0233		0.0216	0.0216	0.0000	51.0012	51.0012	0.0144	0.0000	51.3601
Total	**0.0475**	**0.4716**	**0.3235**	**5.8000e-004**	**0.0496**	**0.0233**	**0.0729**	**7.5100e-003**	**0.0216**	**0.0291**	**0.0000**	**51.0012**	**51.0012**	**0.0144**	**0.0000**	**51.3601**

3.2 Demolition - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	1.9300e-003	0.0634	0.0148	1.8000e-004	3.9400e-003	1.9000e-004	4.1300e-003	1.0800e-003	1.8000e-004	1.2600e-003	0.0000	17.4566	17.4566	1.2100e-003	0.0000	17.4869
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	7.2000e-004	5.3000e-004	6.0900e-003	2.0000e-005	1.6800e-003	1.0000e-005	1.6900e-003	4.5000e-004	1.0000e-005	4.6000e-004	0.0000	1.5281	1.5281	5.0000e-005	0.0000	1.5293
Total	**2.6500e-003**	**0.0639**	**0.0209**	**2.0000e-004**	**5.6200e-003**	**2.0000e-004**	**5.8200e-003**	**1.5300e-003**	**1.9000e-004**	**1.7200e-003**	**0.0000**	**18.9847**	**18.9847**	**1.2600e-003**	**0.0000**	**19.0161**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0496	0.0000	0.0496	7.5100e-003	0.0000	7.5100e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0475	0.4716	0.3235	5.8000e-004		0.0233	0.0233		0.0216	0.0216	0.0000	51.0011	51.0011	0.0144	0.0000	51.3600
Total	**0.0475**	**0.4716**	**0.3235**	**5.8000e-004**	**0.0496**	**0.0233**	**0.0729**	**7.5100e-003**	**0.0216**	**0.0291**	**0.0000**	**51.0011**	**51.0011**	**0.0144**	**0.0000**	**51.3600**

3.2 Demolition - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	1.9300e-003	0.0634	0.0148	1.8000e-004	3.9400e-003	1.9000e-004	4.1300e-003	1.0800e-003	1.8000e-004	1.2600e-003	0.0000	17.4566	17.4566	1.2100e-003	0.0000	17.4869
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	7.2000e-004	5.3000e-004	6.0900e-003	2.0000e-005	1.6800e-003	1.0000e-005	1.6900e-003	4.5000e-004	1.0000e-005	4.6000e-004	0.0000	1.5281	1.5281	5.0000e-005	0.0000	1.5293
Total	**2.6500e-003**	**0.0639**	**0.0209**	**2.0000e-004**	**5.6200e-003**	**2.0000e-004**	**5.8200e-003**	**1.5300e-003**	**1.9000e-004**	**1.7200e-003**	**0.0000**	**18.9847**	**18.9847**	**1.2600e-003**	**0.0000**	**19.0161**

3.3 Site Preparation - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1807	0.0000	0.1807	0.0993	0.0000	0.0993	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0389	0.4050	0.2115	3.8000e-004		0.0204	0.0204		0.0188	0.0188	0.0000	33.4357	33.4357	0.0108	0.0000	33.7061
Total	**0.0389**	**0.4050**	**0.2115**	**3.8000e-004**	**0.1807**	**0.0204**	**0.2011**	**0.0993**	**0.0188**	**0.1181**	**0.0000**	**33.4357**	**33.4357**	**0.0108**	**0.0000**	**33.7061**

3.3 Site Preparation - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.8000e-004	4.3000e-004	4.8700e-003	1.0000e-005	1.3400e-003	1.0000e-005	1.3500e-003	3.6000e-004	1.0000e-005	3.7000e-004	0.0000	1.2225	1.2225	4.0000e-005	0.0000	1.2234
Total	**5.8000e-004**	**4.3000e-004**	**4.8700e-003**	**1.0000e-005**	**1.3400e-003**	**1.0000e-005**	**1.3500e-003**	**3.6000e-004**	**1.0000e-005**	**3.7000e-004**	**0.0000**	**1.2225**	**1.2225**	**4.0000e-005**	**0.0000**	**1.2234**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1807	0.0000	0.1807	0.0993	0.0000	0.0993	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0389	0.4050	0.2115	3.8000e-004		0.0204	0.0204		0.0188	0.0188	0.0000	33.4357	33.4357	0.0108	0.0000	33.7060
Total	**0.0389**	**0.4050**	**0.2115**	**3.8000e-004**	**0.1807**	**0.0204**	**0.2011**	**0.0993**	**0.0188**	**0.1181**	**0.0000**	**33.4357**	**33.4357**	**0.0108**	**0.0000**	**33.7060**

3.3 Site Preparation - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.8000e-004	4.3000e-004	4.8700e-003	1.0000e-005	1.3400e-003	1.0000e-005	1.3500e-003	3.6000e-004	1.0000e-005	3.7000e-004	0.0000	1.2225	1.2225	4.0000e-005	0.0000	1.2234
Total	**5.8000e-004**	**4.3000e-004**	**4.8700e-003**	**1.0000e-005**	**1.3400e-003**	**1.0000e-005**	**1.3500e-003**	**3.6000e-004**	**1.0000e-005**	**3.7000e-004**	**0.0000**	**1.2225**	**1.2225**	**4.0000e-005**	**0.0000**	**1.2234**

3.4 Grading - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1741	0.0000	0.1741	0.0693	0.0000	0.0693	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0796	0.8816	0.5867	1.1800e-003		0.0377	0.0377		0.0347	0.0347	0.0000	103.5405	103.5405	0.0335	0.0000	104.3776
Total	**0.0796**	**0.8816**	**0.5867**	**1.1800e-003**	**0.1741**	**0.0377**	**0.2118**	**0.0693**	**0.0347**	**0.1040**	**0.0000**	**103.5405**	**103.5405**	**0.0335**	**0.0000**	**104.3776**

3.4 Grading - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.2200e-003	9.0000e-004	0.0103	3.0000e-005	2.8300e-003	2.0000e-005	2.8600e-003	7.5000e-004	2.0000e-005	7.8000e-004	0.0000	2.5808	2.5808	8.0000e-005	0.0000	2.5828
Total	**1.2200e-003**	**9.0000e-004**	**0.0103**	**3.0000e-005**	**2.8300e-003**	**2.0000e-005**	**2.8600e-003**	**7.5000e-004**	**2.0000e-005**	**7.8000e-004**	**0.0000**	**2.5808**	**2.5808**	**8.0000e-005**	**0.0000**	**2.5828**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1741	0.0000	0.1741	0.0693	0.0000	0.0693	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0796	0.8816	0.5867	1.1800e-003		0.0377	0.0377		0.0347	0.0347	0.0000	103.5403	103.5403	0.0335	0.0000	104.3775
Total	**0.0796**	**0.8816**	**0.5867**	**1.1800e-003**	**0.1741**	**0.0377**	**0.2118**	**0.0693**	**0.0347**	**0.1040**	**0.0000**	**103.5403**	**103.5403**	**0.0335**	**0.0000**	**104.3775**

3.4 Grading - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.2200e-003	9.0000e-004	0.0103	3.0000e-005	2.8300e-003	2.0000e-005	2.8600e-003	7.5000e-004	2.0000e-005	7.8000e-004	0.0000	2.5808	2.5808	8.0000e-005	0.0000	2.5828
Total	**1.2200e-003**	**9.0000e-004**	**0.0103**	**3.0000e-005**	**2.8300e-003**	**2.0000e-005**	**2.8600e-003**	**7.5000e-004**	**2.0000e-005**	**7.8000e-004**	**0.0000**	**2.5808**	**2.5808**	**8.0000e-005**	**0.0000**	**2.5828**

3.4 Grading - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0807	0.0000	0.0807	0.0180	0.0000	0.0180	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0127	0.1360	0.1017	2.2000e-004		5.7200e-003	5.7200e-003		5.2600e-003	5.2600e-003	0.0000	19.0871	19.0871	6.1700e-003	0.0000	19.2414
Total	**0.0127**	**0.1360**	**0.1017**	**2.2000e-004**	**0.0807**	**5.7200e-003**	**0.0865**	**0.0180**	**5.2600e-003**	**0.0233**	**0.0000**	**19.0871**	**19.0871**	**6.1700e-003**	**0.0000**	**19.2414**

3.4 Grading - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.1000e-004	1.5000e-004	1.7400e-003	1.0000e-005	5.2000e-004	0.0000	5.3000e-004	1.4000e-004	0.0000	1.4000e-004	0.0000	0.4587	0.4587	1.0000e-005	0.0000	0.4590
Total	**2.1000e-004**	**1.5000e-004**	**1.7400e-003**	**1.0000e-005**	**5.2000e-004**	**0.0000**	**5.3000e-004**	**1.4000e-004**	**0.0000**	**1.4000e-004**	**0.0000**	**0.4587**	**0.4587**	**1.0000e-005**	**0.0000**	**0.4590**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0807	0.0000	0.0807	0.0180	0.0000	0.0180	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0127	0.1360	0.1017	2.2000e-004		5.7200e-003	5.7200e-003		5.2600e-003	5.2600e-003	0.0000	19.0871	19.0871	6.1700e-003	0.0000	19.2414
Total	**0.0127**	**0.1360**	**0.1017**	**2.2000e-004**	**0.0807**	**5.7200e-003**	**0.0865**	**0.0180**	**5.2600e-003**	**0.0233**	**0.0000**	**19.0871**	**19.0871**	**6.1700e-003**	**0.0000**	**19.2414**

3.4 Grading - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.1000e-004	1.5000e-004	1.7400e-003	1.0000e-005	5.2000e-004	0.0000	5.3000e-004	1.4000e-004	0.0000	1.4000e-004	0.0000	0.4587	0.4587	1.0000e-005	0.0000	0.4590
Total	**2.1000e-004**	**1.5000e-004**	**1.7400e-003**	**1.0000e-005**	**5.2000e-004**	**0.0000**	**5.3000e-004**	**1.4000e-004**	**0.0000**	**1.4000e-004**	**0.0000**	**0.4587**	**0.4587**	**1.0000e-005**	**0.0000**	**0.4590**

3.5 Building Construction - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.2158	1.9754	2.0700	3.4100e-003		0.1023	0.1023		0.0963	0.0963	0.0000	293.1324	293.1324	0.0702	0.0000	294.8881
Total	**0.2158**	**1.9754**	**2.0700**	**3.4100e-003**		**0.1023**	**0.1023**		**0.0963**	**0.0963**	**0.0000**	**293.1324**	**293.1324**	**0.0702**	**0.0000**	**294.8881**

3.5 Building Construction - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0527	1.6961	0.4580	4.5500e-003	0.1140	3.1800e-003	0.1171	0.0329	3.0400e-003	0.0359	0.0000	441.9835	441.9835	0.0264	0.0000	442.6435
Worker	0.3051	0.2164	2.5233	7.3500e-003	0.7557	6.2300e-003	0.7619	0.2007	5.7400e-003	0.2065	0.0000	663.9936	663.9936	0.0187	0.0000	664.4604
Total	**0.3578**	**1.9125**	**2.9812**	**0.0119**	**0.8696**	**9.4100e-003**	**0.8790**	**0.2336**	**8.7800e-003**	**0.2424**	**0.0000**	**1,105.9771**	**1,105.9771**	**0.0451**	**0.0000**	**1,107.1039**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.2158	1.9754	2.0700	3.4100e-003		0.1023	0.1023		0.0963	0.0963	0.0000	293.1321	293.1321	0.0702	0.0000	294.8877
Total	**0.2158**	**1.9754**	**2.0700**	**3.4100e-003**		**0.1023**	**0.1023**		**0.0963**	**0.0963**	**0.0000**	**293.1321**	**293.1321**	**0.0702**	**0.0000**	**294.8877**

3.5 Building Construction - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0527	1.6961	0.4580	4.5500e-003	0.1140	3.1800e-003	0.1171	0.0329	3.0400e-003	0.0359	0.0000	441.9835	441.9835	0.0264	0.0000	442.6435
Worker	0.3051	0.2164	2.5233	7.3500e-003	0.7557	6.2300e-003	0.7619	0.2007	5.7400e-003	0.2065	0.0000	663.9936	663.9936	0.0187	0.0000	664.4604
Total	**0.3578**	**1.9125**	**2.9812**	**0.0119**	**0.8696**	**9.4100e-003**	**0.8790**	**0.2336**	**8.7800e-003**	**0.2424**	**0.0000**	**1,105.9771**	**1,105.9771**	**0.0451**	**0.0000**	**1,107.1039**

3.5 Building Construction - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1942	1.7765	2.0061	3.3300e-003		0.0864	0.0864		0.0813	0.0813	0.0000	286.2789	286.2789	0.0681	0.0000	287.9814
Total	**0.1942**	**1.7765**	**2.0061**	**3.3300e-003**		**0.0864**	**0.0864**		**0.0813**	**0.0813**	**0.0000**	**286.2789**	**286.2789**	**0.0681**	**0.0000**	**287.9814**

3.5 Building Construction - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0382	1.2511	0.4011	4.3000e-003	0.1113	1.4600e-003	0.1127	0.0321	1.4000e-003	0.0335	0.0000	417.9930	417.9930	0.0228	0.0000	418.5624
Worker	0.2795	0.1910	2.2635	6.9100e-003	0.7377	5.9100e-003	0.7436	0.1960	5.4500e-003	0.2014	0.0000	624.5363	624.5363	0.0164	0.0000	624.9466
Total	**0.3177**	**1.4420**	**2.6646**	**0.0112**	**0.8490**	**7.3700e-003**	**0.8564**	**0.2281**	**6.8500e-003**	**0.2349**	**0.0000**	**1,042.5294**	**1,042.5294**	**0.0392**	**0.0000**	**1,043.5090**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1942	1.7765	2.0061	3.3300e-003		0.0864	0.0864		0.0813	0.0813	0.0000	286.2785	286.2785	0.0681	0.0000	287.9811
Total	**0.1942**	**1.7765**	**2.0061**	**3.3300e-003**		**0.0864**	**0.0864**		**0.0813**	**0.0813**	**0.0000**	**286.2785**	**286.2785**	**0.0681**	**0.0000**	**287.9811**

3.5 Building Construction - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0382	1.2511	0.4011	4.3000e-003	0.1113	1.4600e-003	0.1127	0.0321	1.4000e-003	0.0335	0.0000	417.9930	417.9930	0.0228	0.0000	418.5624
Worker	0.2795	0.1910	2.2635	6.9100e-003	0.7377	5.9100e-003	0.7436	0.1960	5.4500e-003	0.2014	0.0000	624.5363	624.5363	0.0164	0.0000	624.9466
Total	**0.3177**	**1.4420**	**2.6646**	**0.0112**	**0.8490**	**7.3700e-003**	**0.8564**	**0.2281**	**6.8500e-003**	**0.2349**	**0.0000**	**1,042.5294**	**1,042.5294**	**0.0392**	**0.0000**	**1,043.5090**

3.6 Paving - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	6.7100e-003	0.0663	0.0948	1.5000e-004		3.3200e-003	3.3200e-003		3.0500e-003	3.0500e-003	0.0000	13.0175	13.0175	4.2100e-003	0.0000	13.1227
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**6.7100e-003**	**0.0663**	**0.0948**	**1.5000e-004**		**3.3200e-003**	**3.3200e-003**		**3.0500e-003**	**3.0500e-003**	**0.0000**	**13.0175**	**13.0175**	**4.2100e-003**	**0.0000**	**13.1227**

3.6 Paving - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.8000e-004	1.9000e-004	2.2300e-003	1.0000e-005	7.3000e-004	1.0000e-005	7.3000e-004	1.9000e-004	1.0000e-005	2.0000e-004	0.0000	0.6156	0.6156	2.0000e-005	0.0000	0.6160
Total	**2.8000e-004**	**1.9000e-004**	**2.2300e-003**	**1.0000e-005**	**7.3000e-004**	**1.0000e-005**	**7.3000e-004**	**1.9000e-004**	**1.0000e-005**	**2.0000e-004**	**0.0000**	**0.6156**	**0.6156**	**2.0000e-005**	**0.0000**	**0.6160**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	6.7100e-003	0.0663	0.0948	1.5000e-004		3.3200e-003	3.3200e-003		3.0500e-003	3.0500e-003	0.0000	13.0175	13.0175	4.2100e-003	0.0000	13.1227
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**6.7100e-003**	**0.0663**	**0.0948**	**1.5000e-004**		**3.3200e-003**	**3.3200e-003**		**3.0500e-003**	**3.0500e-003**	**0.0000**	**13.0175**	**13.0175**	**4.2100e-003**	**0.0000**	**13.1227**

3.6 Paving - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.8000e-004	1.9000e-004	2.2300e-003	1.0000e-005	7.3000e-004	1.0000e-005	7.3000e-004	1.9000e-004	1.0000e-005	2.0000e-004	0.0000	0.6156	0.6156	2.0000e-005	0.0000	0.6160
Total	**2.8000e-004**	**1.9000e-004**	**2.2300e-003**	**1.0000e-005**	**7.3000e-004**	**1.0000e-005**	**7.3000e-004**	**1.9000e-004**	**1.0000e-005**	**2.0000e-004**	**0.0000**	**0.6156**	**0.6156**	**2.0000e-005**	**0.0000**	**0.6160**

3.6 Paving - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0109	0.1048	0.1609	2.5000e-004		5.1500e-003	5.1500e-003		4.7400e-003	4.7400e-003	0.0000	22.0292	22.0292	7.1200e-003	0.0000	22.2073
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0109**	**0.1048**	**0.1609**	**2.5000e-004**		**5.1500e-003**	**5.1500e-003**		**4.7400e-003**	**4.7400e-003**	**0.0000**	**22.0292**	**22.0292**	**7.1200e-003**	**0.0000**	**22.2073**

3.6 Paving - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	4.4000e-004	2.9000e-004	3.5100e-003	1.0000e-005	1.2300e-003	1.0000e-005	1.2400e-003	3.3000e-004	1.0000e-005	3.4000e-004	0.0000	1.0094	1.0094	3.0000e-005	0.0000	1.0100
Total	**4.4000e-004**	**2.9000e-004**	**3.5100e-003**	**1.0000e-005**	**1.2300e-003**	**1.0000e-005**	**1.2400e-003**	**3.3000e-004**	**1.0000e-005**	**3.4000e-004**	**0.0000**	**1.0094**	**1.0094**	**3.0000e-005**	**0.0000**	**1.0100**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0109	0.1048	0.1609	2.5000e-004		5.1500e-003	5.1500e-003		4.7400e-003	4.7400e-003	0.0000	22.0292	22.0292	7.1200e-003	0.0000	22.2073
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0109**	**0.1048**	**0.1609**	**2.5000e-004**		**5.1500e-003**	**5.1500e-003**		**4.7400e-003**	**4.7400e-003**	**0.0000**	**22.0292**	**22.0292**	**7.1200e-003**	**0.0000**	**22.2073**

3.6 Paving - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	4.4000e-004	2.9000e-004	3.5100e-003	1.0000e-005	1.2300e-003	1.0000e-005	1.2400e-003	3.3000e-004	1.0000e-005	3.4000e-004	0.0000	1.0094	1.0094	3.0000e-005	0.0000	1.0100
Total	**4.4000e-004**	**2.9000e-004**	**3.5100e-003**	**1.0000e-005**	**1.2300e-003**	**1.0000e-005**	**1.2400e-003**	**3.3000e-004**	**1.0000e-005**	**3.4000e-004**	**0.0000**	**1.0094**	**1.0094**	**3.0000e-005**	**0.0000**	**1.0100**

3.7 Architectural Coating - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	4.1372					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.1600e-003	0.0213	0.0317	5.0000e-005		1.0700e-003	1.0700e-003		1.0700e-003	1.0700e-003	0.0000	4.4682	4.4682	2.5000e-004	0.0000	4.4745
Total	**4.1404**	**0.0213**	**0.0317**	**5.0000e-005**		**1.0700e-003**	**1.0700e-003**		**1.0700e-003**	**1.0700e-003**	**0.0000**	**4.4682**	**4.4682**	**2.5000e-004**	**0.0000**	**4.4745**

3.7 Architectural Coating - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	7.4800e-003	4.9300e-003	0.0596	1.9000e-004	0.0209	1.6000e-004	0.0211	5.5500e-003	1.5000e-004	5.7000e-003	0.0000	17.1287	17.1287	4.3000e-004	0.0000	17.1394
Total	**7.4800e-003**	**4.9300e-003**	**0.0596**	**1.9000e-004**	**0.0209**	**1.6000e-004**	**0.0211**	**5.5500e-003**	**1.5000e-004**	**5.7000e-003**	**0.0000**	**17.1287**	**17.1287**	**4.3000e-004**	**0.0000**	**17.1394**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	4.1372					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.1600e-003	0.0213	0.0317	5.0000e-005		1.0700e-003	1.0700e-003		1.0700e-003	1.0700e-003	0.0000	4.4682	4.4682	2.5000e-004	0.0000	4.4745
Total	**4.1404**	**0.0213**	**0.0317**	**5.0000e-005**		**1.0700e-003**	**1.0700e-003**		**1.0700e-003**	**1.0700e-003**	**0.0000**	**4.4682**	**4.4682**	**2.5000e-004**	**0.0000**	**4.4745**

3.7 Architectural Coating - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	7.4800e-003	4.9300e-003	0.0596	1.9000e-004	0.0209	1.6000e-004	0.0211	5.5500e-003	1.5000e-004	5.7000e-003	0.0000	17.1287	17.1287	4.3000e-004	0.0000	17.1394
Total	**7.4800e-003**	**4.9300e-003**	**0.0596**	**1.9000e-004**	**0.0209**	**1.6000e-004**	**0.0211**	**5.5500e-003**	**1.5000e-004**	**5.7000e-003**	**0.0000**	**17.1287**	**17.1287**	**4.3000e-004**	**0.0000**	**17.1394**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	1.5857	7.9962	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620.4986	7,620.4986	0.3407	0.0000	7,629.0162
Unmitigated	1.5857	7.9962	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620.4986	7,620.4986	0.3407	0.0000	7,629.0162

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Low Rise	145.75	154.25	154.00	506,227	506,227
Apartments Mid Rise	4,026.75	3,773.25	4075.50	13,660,065	13,660,065
General Office Building	288.45	62.55	31.05	706,812	706,812
High Turnover (Sit Down Restaurant)	2,368.80	2,873.52	2817.72	3,413,937	3,413,937
Hotel	192.00	187.50	160.00	445,703	445,703
Quality Restaurant	501.12	511.92	461.20	707,488	707,488
Regional Shopping Center	528.08	601.44	357.84	1,112,221	1,112,221
Total	8,050.95	8,164.43	8,057.31	20,552,452	20,552,452

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Low Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
Apartments Mid Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
General Office Building	16.60	8.40	6.90	33.00	48.00	19.00	77	19	4
High Turnover (Sit Down	16.60	8.40	6.90	8.50	72.50	19.00	37	20	43
Hotel	16.60	8.40	6.90	19.40	61.60	19.00	58	38	4
Quality Restaurant	16.60	8.40	6.90	12.00	69.00	19.00	38	18	44
Regional Shopping Center	16.60	8.40	6.90	16.30	64.70	19.00	54	35	11

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Apartments Mid Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
General Office Building	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
High Turnover (Sit Down Restaurant)	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Hotel	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Quality Restaurant	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Regional Shopping Center	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	2,512.6465	2,512.6465	0.1037	0.0215	2,521.6356
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	2,512.6465	2,512.6465	0.1037	0.0215	2,521.6356
NaturalGas Mitigated	0.1398	1.2312	0.7770	7.6200e-003		0.0966	0.0966		0.0966	0.0966	0.0000	1,383.4267	1,383.4267	0.0265	0.0254	1,391.6478
NaturalGas Unmitigated	0.1398	1.2312	0.7770	7.6200e-003		0.0966	0.0966		0.0966	0.0966	0.0000	1,383.4267	1,383.4267	0.0265	0.0254	1,391.6478

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	408494	2.2000e-003	0.0188	8.0100e-003	1.2000e-004		1.5200e-003	1.5200e-003		1.5200e-003	1.5200e-003	0.0000	21.7988	21.7988	4.2000e-004	4.0000e-004	21.9284
Apartments Mid Rise	1.30613e+007	0.0704	0.6018	0.2561	3.8400e-003		0.0487	0.0487		0.0487	0.0487	0.0000	696.9989	696.9989	0.0134	0.0128	701.1408
General Office Building	468450	2.5300e-003	0.0230	0.0193	1.4000e-004		1.7500e-003	1.7500e-003		1.7500e-003	1.7500e-003	0.0000	24.9983	24.9983	4.8000e-004	4.6000e-004	25.1468
High Turnover (Sit Down Restaurant)	8.30736e+006	0.0448	0.4072	0.3421	2.4400e-003		0.0310	0.0310		0.0310	0.0310	0.0000	443.3124	443.3124	8.5000e-003	8.1300e-003	445.9468
Hotel	1.74095e+006	9.3900e-003	0.0853	0.0717	5.1000e-004		6.4900e-003	6.4900e-003		6.4900e-003	6.4900e-003	0.0000	92.9036	92.9036	1.7800e-003	1.7000e-003	93.4557
Quality Restaurant	1.84608e+006	9.9500e-003	0.0905	0.0760	5.4000e-004		6.8800e-003	6.8800e-003		6.8800e-003	6.8800e-003	0.0000	98.5139	98.5139	1.8900e-003	1.8100e-003	99.0993
Regional Shopping Center	91840	5.0000e-004	4.5000e-003	3.7800e-003	3.0000e-005		3.4000e-004	3.4000e-004		3.4000e-004	3.4000e-004	0.0000	4.9009	4.9009	9.0000e-005	9.0000e-005	4.9301
Total		**0.1398**	**1.2312**	**0.7770**	**7.6200e-003**		**0.0966**	**0.0966**		**0.0966**	**0.0966**	**0.0000**	**1,383.4268**	**1,383.4268**	**0.0265**	**0.0254**	**1,391.6478**

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	408494	2.2000e-003	0.0188	8.0100e-003	1.2000e-004		1.5200e-003	1.5200e-003		1.5200e-003	1.5200e-003	0.0000	21.7988	21.7988	4.2000e-004	4.0000e-004	21.9284
Apartments Mid Rise	1.30613e+007	0.0704	0.6018	0.2561	3.8400e-003		0.0487	0.0487		0.0487	0.0487	0.0000	696.9989	696.9989	0.0134	0.0128	701.1408
General Office Building	468450	2.5300e-003	0.0230	0.0193	1.4000e-004		1.7500e-003	1.7500e-003		1.7500e-003	1.7500e-003	0.0000	24.9983	24.9983	4.8000e-004	4.6000e-004	25.1468
High Turnover (Sit Down Restaurant)	8.30736e+006	0.0448	0.4072	0.3421	2.4400e-003		0.0310	0.0310		0.0310	0.0310	0.0000	443.3124	443.3124	8.5000e-003	8.1300e-003	445.9468
Hotel	1.74095e+006	9.3900e-003	0.0853	0.0717	5.1000e-004		6.4900e-003	6.4900e-003		6.4900e-003	6.4900e-003	0.0000	92.9036	92.9036	1.7800e-003	1.7000e-003	93.4557
Quality Restaurant	1.84608e+006	9.9500e-003	0.0905	0.0760	5.4000e-004		6.8800e-003	6.8800e-003		6.8800e-003	6.8800e-003	0.0000	98.5139	98.5139	1.8900e-003	1.8100e-003	99.0993
Regional Shopping Center	91840	5.0000e-004	4.5000e-003	3.7800e-003	3.0000e-005		3.4000e-004	3.4000e-004		3.4000e-004	3.4000e-004	0.0000	4.9009	4.9009	9.0000e-005	9.0000e-005	4.9301
Total		**0.1398**	**1.2312**	**0.7770**	**7.6200e-003**		**0.0966**	**0.0966**		**0.0966**	**0.0966**	**0.0000**	**1,383.4268**	**1,383.4268**	**0.0265**	**0.0254**	**1,391.6478**

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	106010	33.7770	1.3900e-003	2.9000e-004	33.8978
Apartments Mid Rise	3.94697e+006	1,257.5879	0.0519	0.0107	1,262.0869
General Office Building	584550	186.2502	7.6900e-003	1.5900e-003	186.9165
High Turnover (Sit Down Restaurant)	1.58904e+006	506.3022	0.0209	4.3200e-003	508.1135
Hotel	550308	175.3399	7.2400e-003	1.5000e-003	175.9672
Quality Restaurant	353120	112.5116	4.6500e-003	9.6000e-004	112.9141
Regional Shopping Center	756000	240.8778	9.9400e-003	2.0600e-003	241.7395
Total		**2,512.6465**	**0.1037**	**0.0215**	**2,521.6356**

5.3 Energy by Land Use - Electricity

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	106010	33.7770	1.3900e-003	2.9000e-004	33.8978
Apartments Mid Rise	3.94697e+006	1,257.5879	0.0519	0.0107	1,262.0869
General Office Building	584550	186.2502	7.6900e-003	1.5900e-003	186.9165
High Turnover (Sit Down Restaurant)	1.58904e+006	506.3022	0.0209	4.3200e-003	508.1135
Hotel	550308	175.3399	7.2400e-003	1.5000e-003	175.9672
Quality Restaurant	353120	112.5116	4.6500e-003	9.6000e-004	112.9141
Regional Shopping Center	756000	240.8778	9.9400e-003	2.0600e-003	241.7395
Total		**2,512.6465**	**0.1037**	**0.0215**	**2,521.6356**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	5.1437	0.2950	10.3804	1.6700e-003		0.0714	0.0714		0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835
Unmitigated	5.1437	0.2950	10.3804	1.6700e-003		0.0714	0.0714		0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.4137					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	4.3998					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0206	0.1763	0.0750	1.1200e-003		0.0143	0.0143		0.0143	0.0143	0.0000	204.1166	204.1166	3.9100e-003	3.7400e-003	205.3295
Landscaping	0.3096	0.1187	10.3054	5.4000e-004		0.0572	0.0572		0.0572	0.0572	0.0000	16.8504	16.8504	0.0161	0.0000	17.2540
Total	**5.1437**	**0.2950**	**10.3804**	**1.6600e-003**		**0.0714**	**0.0714**		**0.0714**	**0.0714**	**0.0000**	**220.9670**	**220.9670**	**0.0201**	**3.7400e-003**	**222.5835**

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.4137					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	4.3998					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0206	0.1763	0.0750	1.1200e-003		0.0143	0.0143		0.0143	0.0143	0.0000	204.1166	204.1166	3.9100e-003	3.7400e-003	205.3295
Landscaping	0.3096	0.1187	10.3054	5.4000e-004		0.0572	0.0572		0.0572	0.0572	0.0000	16.8504	16.8504	0.0161	0.0000	17.2540
Total	**5.1437**	**0.2950**	**10.3804**	**1.6600e-003**		**0.0714**	**0.0714**		**0.0714**	**0.0714**	**0.0000**	**220.9670**	**220.9670**	**0.0201**	**3.7400e-003**	**222.5835**

7.0 Water Detail

7.1 Mitigation Measures Water

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	585.8052	3.0183	0.0755	683.7567
Unmitigated	585.8052	3.0183	0.0755	683.7567

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	1.62885 / 1.02688	10.9095	0.0535	1.3400e-003	12.6471
Apartments Mid Rise	63.5252 / 40.0485	425.4719	2.0867	0.0523	493.2363
General Office Building	7.99802 / 4.90201	53.0719	0.2627	6.5900e-003	61.6019
High Turnover (Sit Down Restaurant)	10.9272 / 0.697482	51.2702	0.3580	8.8200e-003	62.8482
Hotel	1.26834 / 0.140927	6.1633	0.0416	1.0300e-003	7.5079
Quality Restaurant	2.42827 / 0.154996	11.3934	0.0796	1.9600e-003	13.9663
Regional Shopping Center	4.14806 / 2.54236	27.5250	0.1363	3.4200e-003	31.9490
Total		**585.8052**	**3.0183**	**0.0755**	**683.7567**

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	1.62885 / 1.02688	10.9095	0.0535	1.3400e-003	12.6471
Apartments Mid Rise	63.5252 / 40.0485	425.4719	2.0867	0.0523	493.2363
General Office Building	7.99802 / 4.90201	53.0719	0.2627	6.5900e-003	61.6019
High Turnover (Sit Down Restaurant)	10.9272 / 0.697482	51.2702	0.3580	8.8200e-003	62.8482
Hotel	1.26834 / 0.140927	6.1633	0.0416	1.0300e-003	7.5079
Quality Restaurant	2.42827 / 0.154996	11.3934	0.0796	1.9600e-003	13.9663
Regional Shopping Center	4.14806 / 2.54236	27.5250	0.1363	3.4200e-003	31.9490
Total		**585.8052**	**3.0183**	**0.0755**	**683.7567**

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	207.8079	12.2811	0.0000	514.8354
Unmitigated	207.8079	12.2811	0.0000	514.8354

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	11.5	2.3344	0.1380	0.0000	5.7834
Apartments Mid Rise	448.5	91.0415	5.3804	0.0000	225.5513
General Office Building	41.85	8.4952	0.5021	0.0000	21.0464
High Turnover (Sit Down Restaurant)	428.4	86.9613	5.1393	0.0000	215.4430
Hotel	27.38	5.5579	0.3285	0.0000	13.7694
Quality Restaurant	7.3	1.4818	0.0876	0.0000	3.6712
Regional Shopping Center	58.8	11.9359	0.7054	0.0000	29.5706
Total		**207.8079**	**12.2811**	**0.0000**	**514.8354**

8.2 Waste by Land Use

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	11.5	2.3344	0.1380	0.0000	5.7834
Apartments Mid Rise	448.5	91.0415	5.3804	0.0000	225.5513
General Office Building	41.85	8.4952	0.5021	0.0000	21.0464
High Turnover (Sit Down Restaurant)	428.4	86.9613	5.1393	0.0000	215.4430
Hotel	27.38	5.5579	0.3285	0.0000	13.7694
Quality Restaurant	7.3	1.4818	0.0876	0.0000	3.6712
Regional Shopping Center	58.8	11.9359	0.7054	0.0000	29.5706
Total		**207.8079**	**12.2811**	**0.0000**	**514.8354**

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

Village South Specific Plan (Proposed)

Los Angeles-South Coast County, Summer

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Office Building	45.00	1000sqft	1.03	45,000.00	0
High Turnover (Sit Down Restaurant)	36.00	1000sqft	0.83	36,000.00	0
Hotel	50.00	Room	1.67	72,600.00	0
Quality Restaurant	8.00	1000sqft	0.18	8,000.00	0
Apartments Low Rise	25.00	Dwelling Unit	1.56	25,000.00	72
Apartments Mid Rise	975.00	Dwelling Unit	25.66	975,000.00	2789
Regional Shopping Center	56.00	1000sqft	1.29	56,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	33
Climate Zone	9			**Operational Year**	2028
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	702.44	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

Project Characteristics - Consistent with the DEIR's model.

Land Use - See SWAPE comment regarding residential and retail land uses.

Construction Phase - See SWAPE comment regarding individual construction phase lengths.

Demolition - Consistent with the DEIR's model. See SWAPE comment regarding demolition.

Vehicle Trips - Saturday trips consistent with the DEIR's model. See SWAPE comment regarding weekday and Sunday trips.

Woodstoves - Woodstoves and wood-burning fireplaces consistent with the DEIR's model. See SWAPE comment regarding gas fireplaces.

Energy Use -

Construction Off-road Equipment Mitigation - See SWAPE comment on construction-related mitigation.

Area Mitigation - See SWAPE comment regarding operational mitigation measures.

Water Mitigation - See SWAPE comment regarding operational mitigation measures.

Trips and VMT - Local hire provision

Table Name	Column Name	Default Value	New Value
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	NumberWood	1.25	0.00
tblFireplaces	NumberWood	48.75	0.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblVehicleTrips	ST_TR	7.16	6.17
tblVehicleTrips	ST_TR	6.39	3.87
tblVehicleTrips	ST_TR	2.46	1.39
tblVehicleTrips	ST_TR	158.37	79.82

tblVehicleTrips	ST_TR	8.19	3.75
tblVehicleTrips	ST_TR	94.36	63.99
tblVehicleTrips	ST_TR	49.97	10.74
tblVehicleTrips	SU_TR	6.07	6.16
tblVehicleTrips	SU_TR	5.86	4.18
tblVehicleTrips	SU_TR	1.05	0.69
tblVehicleTrips	SU_TR	131.84	78.27
tblVehicleTrips	SU_TR	5.95	3.20
tblVehicleTrips	SU_TR	72.16	57.65
tblVehicleTrips	SU_TR	25.24	6.39
tblVehicleTrips	WD_TR	6.59	5.83
tblVehicleTrips	WD_TR	6.65	4.13
tblVehicleTrips	WD_TR	11.03	6.41
tblVehicleTrips	WD_TR	127.15	65.80
tblVehicleTrips	WD_TR	8.17	3.84
tblVehicleTrips	WD_TR	89.95	62.64
tblVehicleTrips	WD_TR	42.70	9.43
tblWoodstoves	NumberCatalytic	1.25	0.00
tblWoodstoves	NumberCatalytic	48.75	0.00
tblWoodstoves	NumberNoncatalytic	1.25	0.00
tblWoodstoves	NumberNoncatalytic	48.75	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	4.2561	46.4415	31.4494	0.0636	18.2032	2.0456	20.2488	9.9670	1.8820	11.8490	0.0000	6,163.4166	6,163.4166	1.9475	0.0000	6,212.1039
2022	4.5441	38.8811	40.8776	0.1240	8.8255	1.6361	10.4616	3.6369	1.5052	5.1421	0.0000	12,493.4403	12,493.4403	1.9485	0.0000	12,518.5707
2023	4.1534	25.7658	38.7457	0.1206	7.0088	0.7592	7.7679	1.8799	0.7136	2.5935	0.0000	12,150.4890	12,150.4890	0.9589	0.0000	12,174.4615
2024	237.0219	9.5478	14.9642	0.0239	1.2171	0.4694	1.2875	0.3229	0.4319	0.4621	0.0000	2,313.1808	2,313.1808	0.7166	0.0000	2,331.0956
Maximum	**237.0219**	**46.4415**	**40.8776**	**0.1240**	**18.2032**	**2.0456**	**20.2488**	**9.9670**	**1.8820**	**11.8490**	**0.0000**	**12,493.4403**	**12,493.4403**	**1.9485**	**0.0000**	**12,518.5707**

2.1 Overall Construction (Maximum Daily Emission)

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	4.2561	46.4415	31.4494	0.0636	18.2032	2.0456	20.2488	9.9670	1.8820	11.8490	0.0000	6,163.4166	6,163.4166	1.9475	0.0000	6,212.1039
2022	4.5441	38.8811	40.8776	0.1240	8.8255	1.6361	10.4616	3.6369	1.5052	5.1421	0.0000	12,493.4403	12,493.4403	1.9485	0.0000	12,518.5707
2023	4.1534	25.7658	38.7457	0.1206	7.0088	0.7592	7.7679	1.8799	0.7136	2.5935	0.0000	12,150.4890	12,150.4890	0.9589	0.0000	12,174.4615
2024	237.0219	9.5478	14.9642	0.0239	1.2171	0.4694	1.2875	0.3229	0.4319	0.4621	0.0000	2,313.1808	2,313.1808	0.7166	0.0000	2,331.0955
Maximum	**237.0219**	**46.4415**	**40.8776**	**0.1240**	**18.2032**	**2.0456**	**20.2488**	**9.9670**	**1.8820**	**11.8490**	**0.0000**	**12,493.4403**	**12,493.4403**	**1.9485**	**0.0000**	**12,518.5707**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Energy	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
Mobile	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070		50,306.6034	50,306.6034	2.1807		50,361.1208
Total	**41.1168**	**67.2262**	**207.5497**	**0.6278**	**45.9592**	**2.4626**	**48.4217**	**12.2950**	**2.4385**	**14.7336**	**0.0000**	**76,811.1816**	**76,811.1816**	**2.8282**	**0.4832**	**77,025.8786**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Energy	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
Mobile	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070		50,306.6034	50,306.6034	2.1807		50,361.1208
Total	**41.1168**	**67.2262**	**207.5497**	**0.6278**	**45.9592**	**2.4626**	**48.4217**	**12.2950**	**2.4385**	**14.7336**	**0.0000**	**76,811.1816**	**76,811.1816**	**2.8282**	**0.4832**	**77,025.8786**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	9/1/2021	10/12/2021	5	30	
2	Site Preparation	Site Preparation	10/13/2021	11/9/2021	5	20	
3	Grading	Grading	11/10/2021	1/11/2022	5	45	
4	Building Construction	Building Construction	1/12/2022	12/12/2023	5	500	
5	Paving	Paving	12/13/2023	1/30/2024	5	35	
6	Architectural Coating	Architectural Coating	1/31/2024	3/19/2024	5	35	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 112.5

Acres of Paving: 0

Residential Indoor: 2,025,000; Residential Outdoor: 675,000; Non-Residential Indoor: 326,400; Non-Residential Outdoor: 108,800; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	458.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	7	18.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	801.00	143.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	160.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					3.3074	0.0000	3.3074	0.5008	0.0000	0.5008			0.0000			0.0000
Off-Road	3.1651	31.4407	21.5650	0.0388		1.5513	1.5513		1.4411	1.4411		3,747.9449	3,747.9449	1.0549		3,774.3174
Total	**3.1651**	**31.4407**	**21.5650**	**0.0388**	**3.3074**	**1.5513**	**4.8588**	**0.5008**	**1.4411**	**1.9419**		**3,747.9449**	**3,747.9449**	**1.0549**		**3,774.3174**

3.2 Demolition - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1273	4.0952	0.9602	0.0119	0.2669	0.0126	0.2795	0.0732	0.0120	0.0852		1,292.2413	1,292.2413	0.0877		1,294.4337
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0487	0.0313	0.4282	1.1800e-003	0.1141	9.5000e-004	0.1151	0.0303	8.8000e-004	0.0311		117.2799	117.2799	3.5200e-003		117.3678
Total	**0.1760**	**4.1265**	**1.3884**	**0.0131**	**0.3810**	**0.0135**	**0.3946**	**0.1034**	**0.0129**	**0.1163**		**1,409.5212**	**1,409.5212**	**0.0912**		**1,411.8015**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					3.3074	0.0000	3.3074	0.5008	0.0000	0.5008			0.0000			0.0000
Off-Road	3.1651	31.4407	21.5650	0.0388		1.5513	1.5513		1.4411	1.4411	0.0000	3,747.9449	3,747.9449	1.0549		3,774.3174
Total	**3.1651**	**31.4407**	**21.5650**	**0.0388**	**3.3074**	**1.5513**	**4.8588**	**0.5008**	**1.4411**	**1.9419**	**0.0000**	**3,747.9449**	**3,747.9449**	**1.0549**		**3,774.3174**

3.2 Demolition - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1273	4.0952	0.9602	0.0119	0.2669	0.0126	0.2795	0.0732	0.0120	0.0852		1,292.2413	1,292.2413	0.0877		1,294.4337
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0487	0.0313	0.4282	1.1800e-003	0.1141	9.5000e-004	0.1151	0.0303	8.8000e-004	0.0311		117.2799	117.2799	3.5200e-003		117.3678
Total	**0.1760**	**4.1265**	**1.3884**	**0.0131**	**0.3810**	**0.0135**	**0.3946**	**0.1034**	**0.0129**	**0.1163**		**1,409.5212**	**1,409.5212**	**0.0912**		**1,411.8015**

3.3 Site Preparation - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809		3,685.6569	3,685.6569	1.1920		3,715.4573
Total	**3.8882**	**40.4971**	**21.1543**	**0.0380**	**18.0663**	**2.0445**	**20.1107**	**9.9307**	**1.8809**	**11.8116**		**3,685.6569**	**3,685.6569**	**1.1920**		**3,715.4573**

3.3 Site Preparation - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0584	0.0375	0.5139	1.4100e-003	0.1369	1.1400e-003	0.1381	0.0363	1.0500e-003	0.0374		140.7359	140.7359	4.2200e-003		140.8414
Total	**0.0584**	**0.0375**	**0.5139**	**1.4100e-003**	**0.1369**	**1.1400e-003**	**0.1381**	**0.0363**	**1.0500e-003**	**0.0374**		**140.7359**	**140.7359**	**4.2200e-003**		**140.8414**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809	0.0000	3,685.6569	3,685.6569	1.1920		3,715.4573
Total	**3.8882**	**40.4971**	**21.1543**	**0.0380**	**18.0663**	**2.0445**	**20.1107**	**9.9307**	**1.8809**	**11.8116**	**0.0000**	**3,685.6569**	**3,685.6569**	**1.1920**		**3,715.4573**

3.3 Site Preparation - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0584	0.0375	0.5139	1.4100e-003	0.1369	1.1400e-003	0.1381	0.0363	1.0500e-003	0.0374		140.7359	140.7359	4.2200e-003		140.8414
Total	**0.0584**	**0.0375**	**0.5139**	**1.4100e-003**	**0.1369**	**1.1400e-003**	**0.1381**	**0.0363**	**1.0500e-003**	**0.0374**		**140.7359**	**140.7359**	**4.2200e-003**		**140.8414**

3.4 Grading - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620		1.9853	1.9853		1.8265	1.8265		6,007.0434	6,007.0434	1.9428		6,055.6134
Total	**4.1912**	**46.3998**	**30.8785**	**0.0620**	**8.6733**	**1.9853**	**10.6587**	**3.5965**	**1.8265**	**5.4230**		**6,007.0434**	**6,007.0434**	**1.9428**		**6,055.6134**

3.4 Grading - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0649	0.0417	0.5710	1.5700e-003	0.1521	1.2700e-003	0.1534	0.0404	1.1700e-003	0.0415		156.3732	156.3732	4.6900e-003		156.4904
Total	**0.0649**	**0.0417**	**0.5710**	**1.5700e-003**	**0.1521**	**1.2700e-003**	**0.1534**	**0.0404**	**1.1700e-003**	**0.0415**		**156.3732**	**156.3732**	**4.6900e-003**		**156.4904**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620		1.9853	1.9853		1.8265	1.8265	0.0000	6,007.0434	6,007.0434	1.9428		6,055.6134
Total	**4.1912**	**46.3998**	**30.8785**	**0.0620**	**8.6733**	**1.9853**	**10.6587**	**3.5965**	**1.8265**	**5.4230**	**0.0000**	**6,007.0434**	**6,007.0434**	**1.9428**		**6,055.6134**

3.4 Grading - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0649	0.0417	0.5710	1.5700e-003	0.1521	1.2700e-003	0.1534	0.0404	1.1700e-003	0.0415		156.3732	156.3732	4.6900e-003		156.4904
Total	**0.0649**	**0.0417**	**0.5710**	**1.5700e-003**	**0.1521**	**1.2700e-003**	**0.1534**	**0.0404**	**1.1700e-003**	**0.0415**		**156.3732**	**156.3732**	**4.6900e-003**		**156.4904**

3.4 Grading - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	3.6248	38.8435	29.0415	0.0621		1.6349	1.6349		1.5041	1.5041		6,011.4105	6,011.4105	1.9442		6,060.0158
Total	**3.6248**	**38.8435**	**29.0415**	**0.0621**	**8.6733**	**1.6349**	**10.3082**	**3.5965**	**1.5041**	**5.1006**		**6,011.4105**	**6,011.4105**	**1.9442**		**6,060.0158**

3.4 Grading - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0607	0.0376	0.5263	1.5100e-003	0.1521	1.2300e-003	0.1534	0.0404	1.1300e-003	0.0415		150.8754	150.8754	4.2400e-003		150.9813
Total	**0.0607**	**0.0376**	**0.5263**	**1.5100e-003**	**0.1521**	**1.2300e-003**	**0.1534**	**0.0404**	**1.1300e-003**	**0.0415**		**150.8754**	**150.8754**	**4.2400e-003**		**150.9813**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	3.6248	38.8435	29.0415	0.0621		1.6349	1.6349		1.5041	1.5041	0.0000	6,011.4105	6,011.4105	1.9442		6,060.0158
Total	**3.6248**	**38.8435**	**29.0415**	**0.0621**	**8.6733**	**1.6349**	**10.3082**	**3.5965**	**1.5041**	**5.1006**	**0.0000**	**6,011.4105**	**6,011.4105**	**1.9442**		**6,060.0158**

3.4 Grading - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0607	0.0376	0.5263	1.5100e-003	0.1521	1.2300e-003	0.1534	0.0404	1.1300e-003	0.0415		150.8754	150.8754	4.2400e-003		150.9813
Total	**0.0607**	**0.0376**	**0.5263**	**1.5100e-003**	**0.1521**	**1.2300e-003**	**0.1534**	**0.0404**	**1.1300e-003**	**0.0415**		**150.8754**	**150.8754**	**4.2400e-003**		**150.9813**

3.5 Building Construction - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.7062	15.6156	16.3634	0.0269		0.8090	0.8090		0.7612	0.7612		2,554.3336	2,554.3336	0.6120		2,569.6322
Total	**1.7062**	**15.6156**	**16.3634**	**0.0269**		**0.8090**	**0.8090**		**0.7612**	**0.7612**		**2,554.3336**	**2,554.3336**	**0.6120**		**2,569.6322**

3.5 Building Construction - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.4079	13.2032	3.4341	0.0364	0.9155	0.0248	0.9404	0.2636	0.0237	0.2873		3,896.5482	3,896.5482	0.2236		3,902.1384
Worker	2.4299	1.5074	21.0801	0.0607	6.0932	0.0493	6.1425	1.6163	0.0454	1.6617		6,042.5585	6,042.5585	0.1697		6,046.8000
Total	**2.8378**	**14.7106**	**24.5142**	**0.0971**	**7.0087**	**0.0741**	**7.0828**	**1.8799**	**0.0691**	**1.9490**		**9,939.1067**	**9,939.1067**	**0.3933**		**9,948.9384**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.7062	15.6156	16.3634	0.0269		0.8090	0.8090		0.7612	0.7612	0.0000	2,554.3336	2,554.3336	0.6120		2,569.6322
Total	**1.7062**	**15.6156**	**16.3634**	**0.0269**		**0.8090**	**0.8090**		**0.7612**	**0.7612**	**0.0000**	**2,554.3336**	**2,554.3336**	**0.6120**		**2,569.6322**

3.5 Building Construction - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.4079	13.2032	3.4341	0.0364	0.9155	0.0248	0.9404	0.2636	0.0237	0.2873		3,896.5482	3,896.5482	0.2236		3,902.1384
Worker	2.4299	1.5074	21.0801	0.0607	6.0932	0.0493	6.1425	1.6163	0.0454	1.6617		6,042.5585	6,042.5585	0.1697		6,046.8000
Total	**2.8378**	**14.7106**	**24.5142**	**0.0971**	**7.0087**	**0.0741**	**7.0828**	**1.8799**	**0.0691**	**1.9490**		**9,939.1067**	**9,939.1067**	**0.3933**		**9,948.9384**

3.5 Building Construction - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584		2,555.2099	2,555.2099	0.6079		2,570.4061
Total	**1.5728**	**14.3849**	**16.2440**	**0.0269**		**0.6997**	**0.6997**		**0.6584**	**0.6584**		**2,555.2099**	**2,555.2099**	**0.6079**		**2,570.4061**

3.5 Building Construction - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.3027	10.0181	3.1014	0.0352	0.9156	0.0116	0.9271	0.2636	0.0111	0.2747		3,773.8762	3,773.8762	0.1982		3,778.8300
Worker	2.2780	1.3628	19.4002	0.0584	6.0932	0.0479	6.1411	1.6163	0.0441	1.6604		5,821.4028	5,821.4028	0.1529		5,825.2254
Total	**2.5807**	**11.3809**	**22.5017**	**0.0936**	**7.0088**	**0.0595**	**7.0682**	**1.8799**	**0.0552**	**1.9350**		**9,595.2790**	**9,595.2790**	**0.3511**		**9,604.0554**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584	0.0000	2,555.2099	2,555.2099	0.6079		2,570.4061
Total	**1.5728**	**14.3849**	**16.2440**	**0.0269**		**0.6997**	**0.6997**		**0.6584**	**0.6584**	**0.0000**	**2,555.2099**	**2,555.2099**	**0.6079**		**2,570.4061**

3.5 Building Construction - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.3027	10.0181	3.1014	0.0352	0.9156	0.0116	0.9271	0.2636	0.0111	0.2747		3,773.8762	3,773.8762	0.1982		3,778.8300
Worker	2.2780	1.3628	19.4002	0.0584	6.0932	0.0479	6.1411	1.6163	0.0441	1.6604		5,821.4028	5,821.4028	0.1529		5,825.2254
Total	**2.5807**	**11.3809**	**22.5017**	**0.0936**	**7.0088**	**0.0595**	**7.0682**	**1.8799**	**0.0552**	**1.9350**		**9,595.2790**	**9,595.2790**	**0.3511**		**9,604.0554**

3.6 Paving - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.0327	10.1917	14.5842	0.0228		0.5102	0.5102		0.4694	0.4694		2,207.5841	2,207.5841	0.7140		2,225.4336
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.0327**	**10.1917**	**14.5842**	**0.0228**		**0.5102**	**0.5102**		**0.4694**	**0.4694**		**2,207.5841**	**2,207.5841**	**0.7140**		**2,225.4336**

3.6 Paving - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0427	0.0255	0.3633	1.0900e-003	0.1141	9.0000e-004	0.1150	0.0303	8.3000e-004	0.0311		109.0150	109.0150	2.8600e-003		109.0866
Total	**0.0427**	**0.0255**	**0.3633**	**1.0900e-003**	**0.1141**	**9.0000e-004**	**0.1150**	**0.0303**	**8.3000e-004**	**0.0311**		**109.0150**	**109.0150**	**2.8600e-003**		**109.0866**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.0327	10.1917	14.5842	0.0228		0.5102	0.5102		0.4694	0.4694	0.0000	2,207.5841	2,207.5841	0.7140		2,225.4336
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.0327**	**10.1917**	**14.5842**	**0.0228**		**0.5102**	**0.5102**		**0.4694**	**0.4694**	**0.0000**	**2,207.5841**	**2,207.5841**	**0.7140**		**2,225.4336**

3.6 Paving - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0427	0.0255	0.3633	1.0900e-003	0.1141	9.0000e-004	0.1150	0.0303	8.3000e-004	0.0311		109.0150	109.0150	2.8600e-003		109.0866
Total	**0.0427**	**0.0255**	**0.3633**	**1.0900e-003**	**0.1141**	**9.0000e-004**	**0.1150**	**0.0303**	**8.3000e-004**	**0.0311**		**109.0150**	**109.0150**	**2.8600e-003**		**109.0866**

3.6 Paving - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9882	9.5246	14.6258	0.0228		0.4685	0.4685		0.4310	0.4310		2,207.5472	2,207.5472	0.7140		2,225.3963
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.9882**	**9.5246**	**14.6258**	**0.0228**		**0.4685**	**0.4685**		**0.4310**	**0.4310**		**2,207.5472**	**2,207.5472**	**0.7140**		**2,225.3963**

3.6 Paving - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0403	0.0233	0.3384	1.0600e-003	0.1141	8.8000e-004	0.1150	0.0303	8.1000e-004	0.0311		105.6336	105.6336	2.6300e-003		105.6992
Total	**0.0403**	**0.0233**	**0.3384**	**1.0600e-003**	**0.1141**	**8.8000e-004**	**0.1150**	**0.0303**	**8.1000e-004**	**0.0311**		**105.6336**	**105.6336**	**2.6300e-003**		**105.6992**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9882	9.5246	14.6258	0.0228		0.4685	0.4685		0.4310	0.4310	0.0000	2,207.5472	2,207.5472	0.7140		2,225.3963
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.9882**	**9.5246**	**14.6258**	**0.0228**		**0.4685**	**0.4685**		**0.4310**	**0.4310**	**0.0000**	**2,207.5472**	**2,207.5472**	**0.7140**		**2,225.3963**

3.6 Paving - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0403	0.0233	0.3384	1.0600e-003	0.1141	8.8000e-004	0.1150	0.0303	8.1000e-004	0.0311		105.6336	105.6336	2.6300e-003		105.6992
Total	**0.0403**	**0.0233**	**0.3384**	**1.0600e-003**	**0.1141**	**8.8000e-004**	**0.1150**	**0.0303**	**8.1000e-004**	**0.0311**		**105.6336**	**105.6336**	**2.6300e-003**		**105.6992**

3.7 Architectural Coating - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	236.4115					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609		281.4481	281.4481	0.0159		281.8443
Total	**236.5923**	**1.2188**	**1.8101**	**2.9700e-003**		**0.0609**	**0.0609**		**0.0609**	**0.0609**		**281.4481**	**281.4481**	**0.0159**		**281.8443**

3.7 Architectural Coating - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.4296	0.2481	3.6098	0.0113	1.2171	9.4300e-003	1.2266	0.3229	8.6800e-003	0.3315		1,126.7583	1,126.7583	0.0280		1,127.4583
Total	**0.4296**	**0.2481**	**3.6098**	**0.0113**	**1.2171**	**9.4300e-003**	**1.2266**	**0.3229**	**8.6800e-003**	**0.3315**		**1,126.7583**	**1,126.7583**	**0.0280**		**1,127.4583**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	236.4115					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609	0.0000	281.4481	281.4481	0.0159		281.8443
Total	**236.5923**	**1.2188**	**1.8101**	**2.9700e-003**		**0.0609**	**0.0609**		**0.0609**	**0.0609**	**0.0000**	**281.4481**	**281.4481**	**0.0159**		**281.8443**

3.7 Architectural Coating - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.4296	0.2481	3.6098	0.0113	1.2171	9.4300e-003	1.2266	0.3229	8.6800e-003	0.3315		1,126.7583	1,126.7583	0.0280		1,127.4583
Total	**0.4296**	**0.2481**	**3.6098**	**0.0113**	**1.2171**	**9.4300e-003**	**1.2266**	**0.3229**	**8.6800e-003**	**0.3315**		**1,126.7583**	**1,126.7583**	**0.0280**		**1,127.4583**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070		50,306.6034	50,306.6034	2.1807		50,361.1208
Unmitigated	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070		50,306.6034	50,306.6034	2.1807		50,361.1208

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Low Rise	145.75	154.25	154.00	506,227	506,227
Apartments Mid Rise	4,026.75	3,773.25	4075.50	13,660,065	13,660,065
General Office Building	288.45	62.55	31.05	706,812	706,812
High Turnover (Sit Down Restaurant)	2,368.80	2,873.52	2817.72	3,413,937	3,413,937
Hotel	192.00	187.50	160.00	445,703	445,703
Quality Restaurant	501.12	511.92	461.20	707,488	707,488
Regional Shopping Center	528.08	601.44	357.84	1,112,221	1,112,221
Total	8,050.95	8,164.43	8,057.31	20,552,452	20,552,452

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Low Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
Apartments Mid Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
General Office Building	16.60	8.40	6.90	33.00	48.00	19.00	77	19	4
High Turnover (Sit Down	16.60	8.40	6.90	8.50	72.50	19.00	37	20	43
Hotel	16.60	8.40	6.90	19.40	61.60	19.00	58	38	4
Quality Restaurant	16.60	8.40	6.90	12.00	69.00	19.00	38	18	44
Regional Shopping Center	16.60	8.40	6.90	16.30	64.70	19.00	54	35	11

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Apartments Mid Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
General Office Building	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
High Turnover (Sit Down Restaurant)	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Hotel	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Quality Restaurant	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Regional Shopping Center	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
NaturalGas Unmitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Low Rise	1119.16	0.0121	0.1031	0.0439	6.6000e-004		8.3400e-003	8.3400e-003		8.3400e-003	8.3400e-003		131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35784.3	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666		4,209.9164	4,209.9164	0.0807	0.0772	4,234.9339
General Office Building	1283.42	0.0138	0.1258	0.1057	7.5000e-004		9.5600e-003	9.5600e-003		9.5600e-003	9.5600e-003		150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22759.9	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696		2,677.6342	2,677.6342	0.0513	0.0491	2,693.5460
Hotel	4769.72	0.0514	0.4676	0.3928	2.8100e-003		0.0355	0.0355		0.0355	0.0355		561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5057.75	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377		595.0298	595.0298	0.0114	0.0109	598.5658
Regional Shopping Center	251.616	2.7100e-003	0.0247	0.0207	1.5000e-004		1.8700e-003	1.8700e-003		1.8700e-003	1.8700e-003		29.6019	29.6019	5.7000e-004	5.4000e-004	29.7778
Total		**0.7660**	**6.7463**	**4.2573**	**0.0418**		**0.5292**	**0.5292**		**0.5292**	**0.5292**		**8,355.9832**	**8,355.9832**	**0.1602**	**0.1532**	**8,405.6387**

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Low Rise	1.11916	0.0121	0.1031	0.0439	6.6000e-004		8.3400e-003	8.3400e-003		8.3400e-003	8.3400e-003		131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35.7843	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666		4,209.9164	4,209.9164	0.0807	0.0772	4,234.9339
General Office Building	1.28342	0.0138	0.1258	0.1057	7.5000e-004		9.5600e-003	9.5600e-003		9.5600e-003	9.5600e-003		150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22.7599	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696		2,677.6342	2,677.6342	0.0513	0.0491	2,693.5460
Hotel	4.76972	0.0514	0.4676	0.3928	2.8100e-003		0.0355	0.0355		0.0355	0.0355		561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5.05775	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377		595.0298	595.0298	0.0114	0.0109	598.5658
Regional Shopping Center	0.251616	2.7100e-003	0.0247	0.0207	1.5000e-004		1.8700e-003	1.8700e-003		1.8700e-003	1.8700e-003		29.6019	29.6019	5.7000e-004	5.4000e-004	29.7778
Total		**0.7660**	**6.7463**	**4.2573**	**0.0418**		**0.5292**	**0.5292**		**0.5292**	**0.5292**		**8,355.9832**	**8,355.9832**	**0.1602**	**0.1532**	**8,405.6387**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Unmitigated	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	2.2670					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	24.1085					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	1.6500	14.1000	6.0000	0.0900		1.1400	1.1400		1.1400	1.1400	0.0000	18,000.0000	18,000.0000	0.3450	0.3300	18,106.9650
Landscaping	2.4766	0.9496	82.4430	4.3600e-003		0.4574	0.4574		0.4574	0.4574		148.5950	148.5950	0.1424		152.1542
Total	**30.5020**	**15.0496**	**88.4430**	**0.0944**		**1.5974**	**1.5974**		**1.5974**	**1.5974**	**0.0000**	**18,148.5950**	**18,148.5950**	**0.4874**	**0.3300**	**18,259.1192**

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	2.2670					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	24.1085					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	1.6500	14.1000	6.0000	0.0900		1.1400	1.1400		1.1400	1.1400	0.0000	18,000.0000	18,000.0000	0.3450	0.3300	18,106.9650
Landscaping	2.4766	0.9496	82.4430	4.3600e-003		0.4574	0.4574		0.4574	0.4574		148.5950	148.5950	0.1424		152.1542
Total	**30.5020**	**15.0496**	**88.4430**	**0.0944**		**1.5974**	**1.5974**		**1.5974**	**1.5974**	**0.0000**	**18,148.5950**	**18,148.5950**	**0.4874**	**0.3300**	**18,259.1192**

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

Village South Specific Plan (Proposed)

Los Angeles-South Coast County, Winter

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Office Building	45.00	1000sqft	1.03	45,000.00	0
High Turnover (Sit Down Restaurant)	36.00	1000sqft	0.83	36,000.00	0
Hotel	50.00	Room	1.67	72,600.00	0
Quality Restaurant	8.00	1000sqft	0.18	8,000.00	0
Apartments Low Rise	25.00	Dwelling Unit	1.56	25,000.00	72
Apartments Mid Rise	975.00	Dwelling Unit	25.66	975,000.00	2789
Regional Shopping Center	56.00	1000sqft	1.29	56,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	33
Climate Zone	9			**Operational Year**	2028
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	702.44	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

Project Characteristics - Consistent with the DEIR's model.

Land Use - See SWAPE comment regarding residential and retail land uses.

Construction Phase - See SWAPE comment regarding individual construction phase lengths.

Demolition - Consistent with the DEIR's model. See SWAPE comment regarding demolition.

Vehicle Trips - Saturday trips consistent with the DEIR's model. See SWAPE comment regarding weekday and Sunday trips.

Woodstoves - Woodstoves and wood-burning fireplaces consistent with the DEIR's model. See SWAPE comment regarding gas fireplaces.

Energy Use -

Construction Off-road Equipment Mitigation - See SWAPE comment on construction-related mitigation.

Area Mitigation - See SWAPE comment regarding operational mitigation measures.

Water Mitigation - See SWAPE comment regarding operational mitigation measures.

Trips and VMT - Local hire provision

Table Name	Column Name	Default Value	New Value
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	NumberWood	1.25	0.00
tblFireplaces	NumberWood	48.75	0.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblVehicleTrips	ST_TR	7.16	6.17
tblVehicleTrips	ST_TR	6.39	3.87
tblVehicleTrips	ST_TR	2.46	1.39
tblVehicleTrips	ST_TR	158.37	79.82

tblVehicleTrips	ST_TR	8.19	3.75
tblVehicleTrips	ST_TR	94.36	63.99
tblVehicleTrips	ST_TR	49.97	10.74
tblVehicleTrips	SU_TR	6.07	6.16
tblVehicleTrips	SU_TR	5.86	4.18
tblVehicleTrips	SU_TR	1.05	0.69
tblVehicleTrips	SU_TR	131.84	78.27
tblVehicleTrips	SU_TR	5.95	3.20
tblVehicleTrips	SU_TR	72.16	57.65
tblVehicleTrips	SU_TR	25.24	6.39
tblVehicleTrips	WD_TR	6.59	5.83
tblVehicleTrips	WD_TR	6.65	4.13
tblVehicleTrips	WD_TR	11.03	6.41
tblVehicleTrips	WD_TR	127.15	65.80
tblVehicleTrips	WD_TR	8.17	3.84
tblVehicleTrips	WD_TR	89.95	62.64
tblVehicleTrips	WD_TR	42.70	9.43
tblWoodstoves	NumberCatalytic	1.25	0.00
tblWoodstoves	NumberCatalytic	48.75	0.00
tblWoodstoves	NumberNoncatalytic	1.25	0.00
tblWoodstoves	NumberNoncatalytic	48.75	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	4.2621	46.4460	31.4068	0.0635	18.2032	2.0456	20.2488	9.9670	1.8820	11.8490	0.0000	6,154.3377	6,154.3377	1.9472	0.0000	6,203.0186
2022	4.7966	38.8851	39.6338	0.1195	8.8255	1.6361	10.4616	3.6369	1.5052	5.1421	0.0000	12,035.3440	12,035.3440	1.9482	0.0000	12,060.6013
2023	4.3939	25.8648	37.5031	0.1162	7.0088	0.7598	7.7685	1.8799	0.7142	2.5940	0.0000	11,710.4080	11,710.4080	0.9617	0.0000	11,734.4497
2024	237.0656	9.5503	14.9372	0.0238	1.2171	0.4694	1.2875	0.3229	0.4319	0.4621	0.0000	2,307.0517	2,307.0517	0.7164	0.0000	2,324.9627
Maximum	**237.0656**	**46.4460**	**39.6338**	**0.1195**	**18.2032**	**2.0456**	**20.2488**	**9.9670**	**1.8820**	**11.8490**	**0.0000**	**12,035.3440**	**12,035.3440**	**1.9482**	**0.0000**	**12,060.6013**

2.1 Overall Construction (Maximum Daily Emission)

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	4.2621	46.4460	31.4068	0.0635	18.2032	2.0456	20.2488	9.9670	1.8820	11.8490	0.0000	6,154.3377	6,154.3377	1.9472	0.0000	6,203.0186
2022	4.7966	38.8851	39.6338	0.1195	8.8255	1.6361	10.4616	3.6369	1.5052	5.1421	0.0000	12,035.3440	12,035.3440	1.9482	0.0000	12,060.6013
2023	4.3939	25.8648	37.5031	0.1162	7.0088	0.7598	7.7685	1.8799	0.7142	2.5940	0.0000	11,710.4080	11,710.4080	0.9617	0.0000	11,734.4497
2024	237.0656	9.5503	14.9372	0.0238	1.2171	0.4694	1.2875	0.3229	0.4319	0.4621	0.0000	2,307.0517	2,307.0517	0.7164	0.0000	2,324.9627
Maximum	**237.0656**	**46.4460**	**39.6338**	**0.1195**	**18.2032**	**2.0456**	**20.2488**	**9.9670**	**1.8820**	**11.8490**	**0.0000**	**12,035.3440**	**12,035.3440**	**1.9482**	**0.0000**	**12,060.6013**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Energy	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
Mobile	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083		47,917.8005	47,917.8005	2.1953		47,972.6839
Total	**40.7912**	**67.7872**	**202.7424**	**0.6043**	**45.9592**	**2.4640**	**48.4231**	**12.2950**	**2.4399**	**14.7349**	**0.0000**	**74,422.3787**	**74,422.3787**	**2.8429**	**0.4832**	**74,637.4417**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Energy	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
Mobile	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083		47,917.8005	47,917.8005	2.1953		47,972.6839
Total	**40.7912**	**67.7872**	**202.7424**	**0.6043**	**45.9592**	**2.4640**	**48.4231**	**12.2950**	**2.4399**	**14.7349**	**0.0000**	**74,422.3787**	**74,422.3787**	**2.8429**	**0.4832**	**74,637.4417**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	9/1/2021	10/12/2021	5	30	
2	Site Preparation	Site Preparation	10/13/2021	11/9/2021	5	20	
3	Grading	Grading	11/10/2021	1/11/2022	5	45	
4	Building Construction	Building Construction	1/12/2022	12/12/2023	5	500	
5	Paving	Paving	12/13/2023	1/30/2024	5	35	
6	Architectural Coating	Architectural Coating	1/31/2024	3/19/2024	5	35	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 112.5

Acres of Paving: 0

Residential Indoor: 2,025,000; Residential Outdoor: 675,000; Non-Residential Indoor: 326,400; Non-Residential Outdoor: 108,800; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	458.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	7	18.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	801.00	143.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	160.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					3.3074	0.0000	3.3074	0.5008	0.0000	0.5008			0.0000			0.0000
Off-Road	3.1651	31.4407	21.5650	0.0388		1.5513	1.5513		1.4411	1.4411		3,747.9449	3,747.9449	1.0549		3,774.3174
Total	**3.1651**	**31.4407**	**21.5650**	**0.0388**	**3.3074**	**1.5513**	**4.8588**	**0.5008**	**1.4411**	**1.9419**		**3,747.9449**	**3,747.9449**	**1.0549**		**3,774.3174**

3.2 Demolition - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1304	4.1454	1.0182	0.0117	0.2669	0.0128	0.2797	0.0732	0.0122	0.0854		1,269.8555	1,269.8555	0.0908		1,272.1252
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0532	0.0346	0.3963	1.1100e-003	0.1141	9.5000e-004	0.1151	0.0303	8.8000e-004	0.0311		110.4707	110.4707	3.3300e-003		110.5539
Total	**0.1835**	**4.1800**	**1.4144**	**0.0128**	**0.3810**	**0.0137**	**0.3948**	**0.1034**	**0.0131**	**0.1165**		**1,380.3262**	**1,380.3262**	**0.0941**		**1,382.6791**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					3.3074	0.0000	3.3074	0.5008	0.0000	0.5008			0.0000			0.0000
Off-Road	3.1651	31.4407	21.5650	0.0388		1.5513	1.5513		1.4411	1.4411	0.0000	3,747.9449	3,747.9449	1.0549		3,774.3174
Total	**3.1651**	**31.4407**	**21.5650**	**0.0388**	**3.3074**	**1.5513**	**4.8588**	**0.5008**	**1.4411**	**1.9419**	**0.0000**	**3,747.9449**	**3,747.9449**	**1.0549**		**3,774.3174**

3.2 Demolition - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1304	4.1454	1.0182	0.0117	0.2669	0.0128	0.2797	0.0732	0.0122	0.0854		1,269.8555	1,269.8555	0.0908		1,272.1252
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0532	0.0346	0.3963	1.1100e-003	0.1141	9.5000e-004	0.1151	0.0303	8.8000e-004	0.0311		110.4707	110.4707	3.3300e-003		110.5539
Total	**0.1835**	**4.1800**	**1.4144**	**0.0128**	**0.3810**	**0.0137**	**0.3948**	**0.1034**	**0.0131**	**0.1165**		**1,380.3262**	**1,380.3262**	**0.0941**		**1,382.6791**

3.3 Site Preparation - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809		3,685.6569	3,685.6569	1.1920		3,715.4573
Total	**3.8882**	**40.4971**	**21.1543**	**0.0380**	**18.0663**	**2.0445**	**20.1107**	**9.9307**	**1.8809**	**11.8116**		**3,685.6569**	**3,685.6569**	**1.1920**		**3,715.4573**

3.3 Site Preparation - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0638	0.0415	0.4755	1.3300e-003	0.1369	1.1400e-003	0.1381	0.0363	1.0500e-003	0.0374		132.5649	132.5649	3.9900e-003		132.6646
Total	**0.0638**	**0.0415**	**0.4755**	**1.3300e-003**	**0.1369**	**1.1400e-003**	**0.1381**	**0.0363**	**1.0500e-003**	**0.0374**		**132.5649**	**132.5649**	**3.9900e-003**		**132.6646**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809	0.0000	3,685.6569	3,685.6569	1.1920		3,715.4573
Total	**3.8882**	**40.4971**	**21.1543**	**0.0380**	**18.0663**	**2.0445**	**20.1107**	**9.9307**	**1.8809**	**11.8116**	**0.0000**	**3,685.6569**	**3,685.6569**	**1.1920**		**3,715.4573**

3.3 Site Preparation - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0638	0.0415	0.4755	1.3300e-003	0.1369	1.1400e-003	0.1381	0.0363	1.0500e-003	0.0374		132.5649	132.5649	3.9900e-003		132.6646
Total	**0.0638**	**0.0415**	**0.4755**	**1.3300e-003**	**0.1369**	**1.1400e-003**	**0.1381**	**0.0363**	**1.0500e-003**	**0.0374**		**132.5649**	**132.5649**	**3.9900e-003**		**132.6646**

3.4 Grading - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620		1.9853	1.9853		1.8265	1.8265		6,007.0434	6,007.0434	1.9428		6,055.6134
Total	**4.1912**	**46.3998**	**30.8785**	**0.0620**	**8.6733**	**1.9853**	**10.6587**	**3.5965**	**1.8265**	**5.4230**		**6,007.0434**	**6,007.0434**	**1.9428**		**6,055.6134**

3.4 Grading - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0709	0.0462	0.5284	1.4800e-003	0.1521	1.2700e-003	0.1534	0.0404	1.1700e-003	0.0415		147.2943	147.2943	4.4300e-003		147.4051
Total	**0.0709**	**0.0462**	**0.5284**	**1.4800e-003**	**0.1521**	**1.2700e-003**	**0.1534**	**0.0404**	**1.1700e-003**	**0.0415**		**147.2943**	**147.2943**	**4.4300e-003**		**147.4051**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620		1.9853	1.9853		1.8265	1.8265	0.0000	6,007.0434	6,007.0434	1.9428		6,055.6134
Total	**4.1912**	**46.3998**	**30.8785**	**0.0620**	**8.6733**	**1.9853**	**10.6587**	**3.5965**	**1.8265**	**5.4230**	**0.0000**	**6,007.0434**	**6,007.0434**	**1.9428**		**6,055.6134**

3.4 Grading - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0709	0.0462	0.5284	1.4800e-003	0.1521	1.2700e-003	0.1534	0.0404	1.1700e-003	0.0415		147.2943	147.2943	4.4300e-003		147.4051
Total	**0.0709**	**0.0462**	**0.5284**	**1.4800e-003**	**0.1521**	**1.2700e-003**	**0.1534**	**0.0404**	**1.1700e-003**	**0.0415**		**147.2943**	**147.2943**	**4.4300e-003**		**147.4051**

3.4 Grading - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	3.6248	38.8435	29.0415	0.0621		1.6349	1.6349		1.5041	1.5041		6,011.4105	6,011.4105	1.9442		6,060.0158
Total	**3.6248**	**38.8435**	**29.0415**	**0.0621**	**8.6733**	**1.6349**	**10.3082**	**3.5965**	**1.5041**	**5.1006**		**6,011.4105**	**6,011.4105**	**1.9442**		**6,060.0158**

3.4 Grading - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0665	0.0416	0.4861	1.4300e-003	0.1521	1.2300e-003	0.1534	0.0404	1.1300e-003	0.0415		142.1207	142.1207	4.0000e-003		142.2207
Total	**0.0665**	**0.0416**	**0.4861**	**1.4300e-003**	**0.1521**	**1.2300e-003**	**0.1534**	**0.0404**	**1.1300e-003**	**0.0415**		**142.1207**	**142.1207**	**4.0000e-003**		**142.2207**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	3.6248	38.8435	29.0415	0.0621		1.6349	1.6349		1.5041	1.5041	0.0000	6,011.4105	6,011.4105	1.9442		6,060.0158
Total	**3.6248**	**38.8435**	**29.0415**	**0.0621**	**8.6733**	**1.6349**	**10.3082**	**3.5965**	**1.5041**	**5.1006**	**0.0000**	**6,011.4105**	**6,011.4105**	**1.9442**		**6,060.0158**

3.4 Grading - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0665	0.0416	0.4861	1.4300e-003	0.1521	1.2300e-003	0.1534	0.0404	1.1300e-003	0.0415		142.1207	142.1207	4.0000e-003		142.2207
Total	**0.0665**	**0.0416**	**0.4861**	**1.4300e-003**	**0.1521**	**1.2300e-003**	**0.1534**	**0.0404**	**1.1300e-003**	**0.0415**		**142.1207**	**142.1207**	**4.0000e-003**		**142.2207**

3.5 Building Construction - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.7062	15.6156	16.3634	0.0269		0.8090	0.8090		0.7612	0.7612		2,554.3336	2,554.3336	0.6120		2,569.6322
Total	**1.7062**	**15.6156**	**16.3634**	**0.0269**		**0.8090**	**0.8090**		**0.7612**	**0.7612**		**2,554.3336**	**2,554.3336**	**0.6120**		**2,569.6322**

3.5 Building Construction - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.4284	13.1673	3.8005	0.0354	0.9155	0.0256	0.9412	0.2636	0.0245	0.2881		3,789.0750	3,789.0750	0.2381		3,795.0283
Worker	2.6620	1.6677	19.4699	0.0571	6.0932	0.0493	6.1425	1.6163	0.0454	1.6617		5,691.9354	5,691.9354	0.1602		5,695.9408
Total	**3.0904**	**14.8350**	**23.2704**	**0.0926**	**7.0087**	**0.0749**	**7.0836**	**1.8799**	**0.0699**	**1.9498**		**9,481.0104**	**9,481.0104**	**0.3984**		**9,490.9691**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.7062	15.6156	16.3634	0.0269		0.8090	0.8090		0.7612	0.7612	0.0000	2,554.3336	2,554.3336	0.6120		2,569.6322
Total	**1.7062**	**15.6156**	**16.3634**	**0.0269**		**0.8090**	**0.8090**		**0.7612**	**0.7612**	**0.0000**	**2,554.3336**	**2,554.3336**	**0.6120**		**2,569.6322**

3.5 Building Construction - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.4284	13.1673	3.8005	0.0354	0.9155	0.0256	0.9412	0.2636	0.0245	0.2881		3,789.0750	3,789.0750	0.2381		3,795.0283
Worker	2.6620	1.6677	19.4699	0.0571	6.0932	0.0493	6.1425	1.6163	0.0454	1.6617		5,691.9354	5,691.9354	0.1602		5,695.9408
Total	**3.0904**	**14.8350**	**23.2704**	**0.0926**	**7.0087**	**0.0749**	**7.0836**	**1.8799**	**0.0699**	**1.9498**		**9,481.0104**	**9,481.0104**	**0.3984**		**9,490.9691**

3.5 Building Construction - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584		2,555.2099	2,555.2099	0.6079		2,570.4061
Total	**1.5728**	**14.3849**	**16.2440**	**0.0269**		**0.6997**	**0.6997**		**0.6584**	**0.6584**		**2,555.2099**	**2,555.2099**	**0.6079**		**2,570.4061**

3.5 Building Construction - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.3183	9.9726	3.3771	0.0343	0.9156	0.0122	0.9277	0.2636	0.0116	0.2752		3,671.4007	3,671.4007	0.2096		3,676.6417
Worker	2.5029	1.5073	17.8820	0.0550	6.0932	0.0479	6.1411	1.6163	0.0441	1.6604		5,483.7974	5,483.7974	0.1442		5,487.4020
Total	**2.8211**	**11.4799**	**21.2591**	**0.0893**	**7.0088**	**0.0601**	**7.0688**	**1.8799**	**0.0557**	**1.9356**		**9,155.1981**	**9,155.1981**	**0.3538**		**9,164.0437**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584	0.0000	2,555.2099	2,555.2099	0.6079		2,570.4061
Total	**1.5728**	**14.3849**	**16.2440**	**0.0269**		**0.6997**	**0.6997**		**0.6584**	**0.6584**	**0.0000**	**2,555.2099**	**2,555.2099**	**0.6079**		**2,570.4061**

3.5 Building Construction - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.3183	9.9726	3.3771	0.0343	0.9156	0.0122	0.9277	0.2636	0.0116	0.2752		3,671.4007	3,671.4007	0.2096		3,676.6417
Worker	2.5029	1.5073	17.8820	0.0550	6.0932	0.0479	6.1411	1.6163	0.0441	1.6604		5,483.7974	5,483.7974	0.1442		5,487.4020
Total	**2.8211**	**11.4799**	**21.2591**	**0.0893**	**7.0088**	**0.0601**	**7.0688**	**1.8799**	**0.0557**	**1.9356**		**9,155.1981**	**9,155.1981**	**0.3538**		**9,164.0437**

3.6 Paving - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.0327	10.1917	14.5842	0.0228		0.5102	0.5102		0.4694	0.4694		2,207.5841	2,207.5841	0.7140		2,225.4336
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.0327**	**10.1917**	**14.5842**	**0.0228**		**0.5102**	**0.5102**		**0.4694**	**0.4694**		**2,207.5841**	**2,207.5841**	**0.7140**		**2,225.4336**

3.6 Paving - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0469	0.0282	0.3349	1.0300e-003	0.1141	9.0000e-004	0.1150	0.0303	8.3000e-004	0.0311		102.6928	102.6928	2.7000e-003		102.7603
Total	**0.0469**	**0.0282**	**0.3349**	**1.0300e-003**	**0.1141**	**9.0000e-004**	**0.1150**	**0.0303**	**8.3000e-004**	**0.0311**		**102.6928**	**102.6928**	**2.7000e-003**		**102.7603**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.0327	10.1917	14.5842	0.0228		0.5102	0.5102		0.4694	0.4694	0.0000	2,207.5841	2,207.5841	0.7140		2,225.4336
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.0327**	**10.1917**	**14.5842**	**0.0228**		**0.5102**	**0.5102**		**0.4694**	**0.4694**	**0.0000**	**2,207.5841**	**2,207.5841**	**0.7140**		**2,225.4336**

3.6 Paving - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0469	0.0282	0.3349	1.0300e-003	0.1141	9.0000e-004	0.1150	0.0303	8.3000e-004	0.0311		102.6928	102.6928	2.7000e-003		102.7603
Total	**0.0469**	**0.0282**	**0.3349**	**1.0300e-003**	**0.1141**	**9.0000e-004**	**0.1150**	**0.0303**	**8.3000e-004**	**0.0311**		**102.6928**	**102.6928**	**2.7000e-003**		**102.7603**

3.6 Paving - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9882	9.5246	14.6258	0.0228		0.4685	0.4685		0.4310	0.4310		2,207.5472	2,207.5472	0.7140		2,225.3963
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.9882**	**9.5246**	**14.6258**	**0.0228**		**0.4685**	**0.4685**		**0.4310**	**0.4310**		**2,207.5472**	**2,207.5472**	**0.7140**		**2,225.3963**

3.6 Paving - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0444	0.0257	0.3114	1.0000e-003	0.1141	8.8000e-004	0.1150	0.0303	8.1000e-004	0.0311		99.5045	99.5045	2.4700e-003		99.5663
Total	**0.0444**	**0.0257**	**0.3114**	**1.0000e-003**	**0.1141**	**8.8000e-004**	**0.1150**	**0.0303**	**8.1000e-004**	**0.0311**		**99.5045**	**99.5045**	**2.4700e-003**		**99.5663**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9882	9.5246	14.6258	0.0228		0.4685	0.4685		0.4310	0.4310	0.0000	2,207.5472	2,207.5472	0.7140		2,225.3963
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.9882**	**9.5246**	**14.6258**	**0.0228**		**0.4685**	**0.4685**		**0.4310**	**0.4310**	**0.0000**	**2,207.5472**	**2,207.5472**	**0.7140**		**2,225.3963**

3.6 Paving - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0444	0.0257	0.3114	1.0000e-003	0.1141	8.8000e-004	0.1150	0.0303	8.1000e-004	0.0311		99.5045	99.5045	2.4700e-003		99.5663
Total	**0.0444**	**0.0257**	**0.3114**	**1.0000e-003**	**0.1141**	**8.8000e-004**	**0.1150**	**0.0303**	**8.1000e-004**	**0.0311**		**99.5045**	**99.5045**	**2.4700e-003**		**99.5663**

3.7 Architectural Coating - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	236.4115					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609		281.4481	281.4481	0.0159		281.8443
Total	**236.5923**	**1.2188**	**1.8101**	**2.9700e-003**		**0.0609**	**0.0609**		**0.0609**	**0.0609**		**281.4481**	**281.4481**	**0.0159**		**281.8443**

3.7 Architectural Coating - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.4734	0.2743	3.3220	0.0107	1.2171	9.4300e-003	1.2266	0.3229	8.6800e-003	0.3315		1,061.3818	1,061.3818	0.0264		1,062.0410
Total	**0.4734**	**0.2743**	**3.3220**	**0.0107**	**1.2171**	**9.4300e-003**	**1.2266**	**0.3229**	**8.6800e-003**	**0.3315**		**1,061.3818**	**1,061.3818**	**0.0264**		**1,062.0410**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	236.4115					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609	0.0000	281.4481	281.4481	0.0159		281.8443
Total	**236.5923**	**1.2188**	**1.8101**	**2.9700e-003**		**0.0609**	**0.0609**		**0.0609**	**0.0609**	**0.0000**	**281.4481**	**281.4481**	**0.0159**		**281.8443**

3.7 Architectural Coating - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.4734	0.2743	3.3220	0.0107	1.2171	9.4300e-003	1.2266	0.3229	8.6800e-003	0.3315		1,061.3818	1,061.3818	0.0264		1,062.0410
Total	**0.4734**	**0.2743**	**3.3220**	**0.0107**	**1.2171**	**9.4300e-003**	**1.2266**	**0.3229**	**8.6800e-003**	**0.3315**		**1,061.3818**	**1,061.3818**	**0.0264**		**1,062.0410**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083		47,917.8005	47,917.8005	2.1953		47,972.6839
Unmitigated	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083		47,917.8005	47,917.8005	2.1953		47,972.6839

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Low Rise	145.75	154.25	154.00	506,227	506,227
Apartments Mid Rise	4,026.75	3,773.25	4075.50	13,660,065	13,660,065
General Office Building	288.45	62.55	31.05	706,812	706,812
High Turnover (Sit Down Restaurant)	2,368.80	2,873.52	2817.72	3,413,937	3,413,937
Hotel	192.00	187.50	160.00	445,703	445,703
Quality Restaurant	501.12	511.92	461.20	707,488	707,488
Regional Shopping Center	528.08	601.44	357.84	1,112,221	1,112,221
Total	8,050.95	8,164.43	8,057.31	20,552,452	20,552,452

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Low Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
Apartments Mid Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
General Office Building	16.60	8.40	6.90	33.00	48.00	19.00	77	19	4
High Turnover (Sit Down	16.60	8.40	6.90	8.50	72.50	19.00	37	20	43
Hotel	16.60	8.40	6.90	19.40	61.60	19.00	58	38	4
Quality Restaurant	16.60	8.40	6.90	12.00	69.00	19.00	38	18	44
Regional Shopping Center	16.60	8.40	6.90	16.30	64.70	19.00	54	35	11

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Apartments Mid Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
General Office Building	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
High Turnover (Sit Down Restaurant)	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Hotel	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Quality Restaurant	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Regional Shopping Center	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
NaturalGas Unmitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Low Rise	1119.16	0.0121	0.1031	0.0439	6.6000e-004		8.3400e-003	8.3400e-003		8.3400e-003	8.3400e-003		131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35784.3	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666		4,209.9164	4,209.9164	0.0807	0.0772	4,234.9339
General Office Building	1283.42	0.0138	0.1258	0.1057	7.5000e-004		9.5600e-003	9.5600e-003		9.5600e-003	9.5600e-003		150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22759.9	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696		2,677.6342	2,677.6342	0.0513	0.0491	2,693.5460
Hotel	4769.72	0.0514	0.4676	0.3928	2.8100e-003		0.0355	0.0355		0.0355	0.0355		561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5057.75	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377		595.0298	595.0298	0.0114	0.0109	598.5658
Regional Shopping Center	251.616	2.7100e-003	0.0247	0.0207	1.5000e-004		1.8700e-003	1.8700e-003		1.8700e-003	1.8700e-003		29.6019	29.6019	5.7000e-004	5.4000e-004	29.7778
Total		**0.7660**	**6.7463**	**4.2573**	**0.0418**		**0.5292**	**0.5292**		**0.5292**	**0.5292**		**8,355.9832**	**8,355.9832**	**0.1602**	**0.1532**	**8,405.6387**

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Low Rise	1.11916	0.0121	0.1031	0.0439	6.6000e-004		8.3400e-003	8.3400e-003		8.3400e-003	8.3400e-003		131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35.7843	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666		4,209.9164	4,209.9164	0.0807	0.0772	4,234.9339
General Office Building	1.28342	0.0138	0.1258	0.1057	7.5000e-004		9.5600e-003	9.5600e-003		9.5600e-003	9.5600e-003		150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22.7599	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696		2,677.6342	2,677.6342	0.0513	0.0491	2,693.5460
Hotel	4.76972	0.0514	0.4676	0.3928	2.8100e-003		0.0355	0.0355		0.0355	0.0355		561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5.05775	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377		595.0298	595.0298	0.0114	0.0109	598.5658
Regional Shopping Center	0.251616	2.7100e-003	0.0247	0.0207	1.5000e-004		1.8700e-003	1.8700e-003		1.8700e-003	1.8700e-003		29.6019	29.6019	5.7000e-004	5.4000e-004	29.7778
Total		**0.7660**	**6.7463**	**4.2573**	**0.0418**		**0.5292**	**0.5292**		**0.5292**	**0.5292**		**8,355.9832**	**8,355.9832**	**0.1602**	**0.1532**	**8,405.6387**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Unmitigated	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	2.2670					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	24.1085					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	1.6500	14.1000	6.0000	0.0900		1.1400	1.1400		1.1400	1.1400	0.0000	18,000.0000	18,000.0000	0.3450	0.3300	18,106.9650
Landscaping	2.4766	0.9496	82.4430	4.3600e-003		0.4574	0.4574		0.4574	0.4574		148.5950	148.5950	0.1424		152.1542
Total	**30.5020**	**15.0496**	**88.4430**	**0.0944**		**1.5974**	**1.5974**		**1.5974**	**1.5974**	**0.0000**	**18,148.5950**	**18,148.5950**	**0.4874**	**0.3300**	**18,259.1192**

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	2.2670					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	24.1085					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	1.6500	14.1000	6.0000	0.0900		1.1400	1.1400		1.1400	1.1400	0.0000	18,000.0000	18,000.0000	0.3450	0.3300	18,106.9650
Landscaping	2.4766	0.9496	82.4430	4.3600e-003		0.4574	0.4574		0.4574	0.4574		148.5950	148.5950	0.1424		152.1542
Total	**30.5020**	**15.0496**	**88.4430**	**0.0944**		**1.5974**	**1.5974**		**1.5974**	**1.5974**	**0.0000**	**18,148.5950**	**18,148.5950**	**0.4874**	**0.3300**	**18,259.1192**

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

Attachment C

Local Hire Provision Net Change	
Without Local Hire Provision	
Total Construction GHG Emissions (MT CO2e)	3,623
Amortized (MT CO2e/year)	120.77
With Local Hire Provision	
Total Construction GHG Emissions (MT CO2e)	3,024
Amortized (MT CO2e/year)	100.80
% Decrease in Construction-related GHG Emissions	***17%***

EXHIBIT B

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

SOIL WATER AIR PROTECTION ENTERPRISE
2656 29th Street, Suite 201
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Paul Rosenfeld, Ph.D.

Chemical Fate and Transport & Air Dispersion Modeling

Principal Environmental Chemist

Risk Assessment & Remediation Specialist

Education

Ph.D. Soil Chemistry, University of Washington, 1999. Dissertation on volatile organic compound filtration.

M.S. Environmental Science, U.C. Berkeley, 1995. Thesis on organic waste economics.

B.A. Environmental Studies, U.C. Santa Barbara, 1991. Thesis on wastewater treatment.

Professional Experience

Dr. Rosenfeld has over 25 years' experience conducting environmental investigations and risk assessments for evaluating impacts to human health, property, and ecological receptors. His expertise focuses on the fate and transport of environmental contaminants, human health risk, exposure assessment, and ecological restoration. Dr. Rosenfeld has evaluated and modeled emissions from unconventional oil drilling operations, oil spills, landfills, boilers and incinerators, process stacks, storage tanks, confined animal feeding operations, and many other industrial and agricultural sources. His project experience ranges from monitoring and modeling of pollution sources to evaluating impacts of pollution on workers at industrial facilities and residents in surrounding communities.

Dr. Rosenfeld has investigated and designed remediation programs and risk assessments for contaminated sites containing lead, heavy metals, mold, bacteria, particulate matter, petroleum hydrocarbons, chlorinated solvents, pesticides, radioactive waste, dioxins and furans, semi- and volatile organic compounds, PCBs, PAHs, perchlorate, asbestos, per- and poly-fluoroalkyl substances (PFOA/PFOS), unusual polymers, fuel oxygenates (MTBE), among other pollutants. Dr. Rosenfeld also has experience evaluating greenhouse gas emissions from various projects and is an expert on the assessment of odors from industrial and agricultural sites, as well as the evaluation of odor nuisance impacts and technologies for abatement of odorous emissions. As a principal scientist at SWAPE, Dr. Rosenfeld directs air dispersion modeling and exposure assessments. He has served as an expert witness and testified about pollution sources causing nuisance and/or personal injury at dozens of sites and has testified as an expert witness on more than ten cases involving exposure to air contaminants from industrial sources.

Professional History:

Soil Water Air Protection Enterprise (SWAPE); 2003 to present; Principal and Founding Partner
UCLA School of Public Health; 2007 to 2011; Lecturer (Assistant Researcher)
UCLA School of Public Health; 2003 to 2006; Adjunct Professor
UCLA Environmental Science and Engineering Program; 2002-2004; Doctoral Intern Coordinator
UCLA Institute of the Environment, 2001-2002; Research Associate
Komex H_2O Science, 2001 to 2003; Senior Remediation Scientist
National Groundwater Association, 2002-2004; Lecturer
San Diego State University, 1999-2001; Adjunct Professor
Anteon Corp., San Diego, 2000-2001; Remediation Project Manager
Ogden (now Amec), San Diego, 2000-2000; Remediation Project Manager
Bechtel, San Diego, California, 1999 – 2000; Risk Assessor
King County, Seattle, 1996 – 1999; Scientist
James River Corp., Washington, 1995-96; Scientist
Big Creek Lumber, Davenport, California, 1995; Scientist
Plumas Corp., California and USFS, Tahoe 1993-1995; Scientist
Peace Corps and World Wildlife Fund, St. Kitts, West Indies, 1991-1993; Scientist

Publications:

Remy, L.L., Clay T., Byers, V., **Rosenfeld P. E.** (2019) Hospital, Health, and Community Burden After Oil Refinery Fires, Richmond, California 2007 and 2012. *Environmental Health.* 18:48

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Rosenfeld, P.E., Grey, M and Suffet, M. (2002). Compost Demonstration Project, Sacramento California Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Integrated Waste Management Board Public Affairs Office*, Publications Clearinghouse (MS–6), Sacramento, CA Publication #442-02-008.

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Rosenfeld, P.E., and Henry C. L., (2000). Wood ash control of odor emissions from biosolids application. *Journal of Environmental Quality.* 29, 1662-1668.

Rosenfeld, P.E., C.L. Henry and D. Bennett. (2001). Wastewater dewatering polymer affect on biosolids odor emissions and microbial activity. *Water Environment Research*. 73(4), 363-367.

Rosenfeld, P.E., and C.L. Henry. (2001). Activated Carbon and Wood Ash Sorption of Wastewater, Compost, and Biosolids Odorants. *Water Environment Research*, 73, 388-393.

Rosenfeld, P.E., and Henry C. L., (2001). High carbon wood ash effect on biosolids microbial activity and odor. *Water Environment Research*. 131(1-4), 247-262.

Chollack, T. and **P. Rosenfeld. (**1998). Compost Amendment Handbook For Landscaping. Prepared for and distributed by the City of Redmond, Washington State.

Rosenfeld, P. E. (1992). The Mount Liamuiga Crater Trail. *Heritage Magazine of St. Kitts*, 3(2).

Rosenfeld, P. E. (1993). High School Biogas Project to Prevent Deforestation On St. Kitts. *Biomass Users Network*, 7(1).

Rosenfeld, P. E. (1998). Characterization, Quantification, and Control of Odor Emissions From Biosolids Application To Forest Soil. Doctoral Thesis. University of Washington College of Forest Resources.

Rosenfeld, P. E. (1994). Potential Utilization of Small Diameter Trees on Sierra County Public Land. Masters thesis reprinted by the Sierra County Economic Council. Sierra County, California.

Rosenfeld, P. E. (1991). How to Build a Small Rural Anaerobic Digester & Uses Of Biogas In The First And Third World. Bachelors Thesis. University of California.

Presentations:

Rosenfeld, P.E., Sutherland, A; Hesse, R.; Zapata, A. (October 3-6, 2013). Air dispersion modeling of volatile organic emissions from multiple natural gas wells in Decatur, TX. *44th Western Regional Meeting, American Chemical Society.* Lecture conducted from Santa Clara, CA.

Sok, H.L.; Waller, C.C.; Feng, L.; Gonzalez, J.; Sutherland, A.J.; Wisdom-Stack, T.; Sahai, R.K.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Atrazine: A Persistent Pesticide in Urban Drinking Water. *Urban Environmental Pollution*. Lecture conducted from Boston, MA.

Feng, L.; Gonzalez, J.; Sok, H.L.; Sutherland, A.J.; Waller, C.C.; Wisdom-Stack, T.; Sahai, R.K.; La, M.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Bringing Environmental Justice to East St. Louis, Illinois. *Urban Environmental Pollution.* Lecture conducted from Boston, MA.

Rosenfeld, P.E. (April 19-23, 2009). Perfluoroctanoic Acid (PFOA) and Perfluoroactane Sulfonate (PFOS) Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*, Lecture conducted from Tuscon, AZ.

Rosenfeld, P.E. (April 19-23, 2009). Cost to Filter Atrazine Contamination from Drinking Water in the United States" Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*. Lecture conducted from Tuscon, AZ.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P**. (20-22 July, 2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. Brebbia, C.A. and Popov, V., eds., *Air Pollution XVII: Proceedings of the Seventeenth International Conference on Modeling, Monitoring and Management of Air Pollution*. Lecture conducted from Tallinn, Estonia.

Rosenfeld, P. E. (October 15-18, 2007). Moss Point Community Exposure To Contaminants From A Releasing Facility. *The 23rd Annual International Conferences on Soils Sediment and Water.* Platform lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld, P. E. (October 15-18, 2007). The Repeated Trespass of Tritium-Contaminated Water Into A Surrounding Community Form Repeated Waste Spills From A Nuclear Power Plant. *The 23rd Annual International Conferences on Soils Sediment and Water*. Platform lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld, P. E. (October 15-18, 2007). Somerville Community Exposure To Contaminants From Wood Treatment Facility Emissions. The *23rd Annual International Conferences on Soils Sediment and Water*. Lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld P. E. (March 2007). Production, Chemical Properties, Toxicology, & Treatment Case Studies of 1,2,3-Trichloropropane (TCP). *The Association for Environmental Health and Sciences (AEHS) Annual Meeting*. Lecture conducted from San Diego, CA.

Rosenfeld P. E. (March 2007). Blood and Attic Sampling for Dioxin/Furan, PAH, and Metal Exposure in Florala, Alabama. *The AEHS Annual Meeting.* Lecture conducted from San Diego, CA.

Hensley A.R., Scott, A., **Rosenfeld P.E.,** Clark, J.J.J. (August 21 – 25, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *The 26th International Symposium on Halogenated Persistent Organic Pollutants – DIOXIN2006*. Lecture conducted from Radisson SAS Scandinavia Hotel in Oslo Norway.

Hensley A.R., Scott, A., **Rosenfeld P.E.,** Clark, J.J.J. (November 4-8, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *APHA 134 Annual Meeting & Exposition.* Lecture conducted from Boston Massachusetts.

Paul Rosenfeld Ph.D. (October 24-25, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. Mealey's C8/PFOA. *Science, Risk & Litigation Conference.* Lecture conducted from The Rittenhouse Hotel, Philadelphia, PA.

Paul Rosenfeld Ph.D. (September 19, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, *Toxicology and Remediation PEMA Emerging Contaminant Conference*. Lecture conducted from Hilton Hotel, Irvine California.

Paul Rosenfeld Ph.D. (September 19, 2005). Fate, Transport, Toxicity, And Persistence of 1,2,3-TCP. *PEMA Emerging Contaminant Conference.* Lecture conducted from Hilton Hotel in Irvine, California.

Paul Rosenfeld Ph.D. (September 26-27, 2005). Fate, Transport and Persistence of PDBEs. *Mealey's Groundwater Conference.* Lecture conducted from Ritz Carlton Hotel, Marina Del Ray, California.

Paul Rosenfeld Ph.D. (June 7-8, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. *International Society of Environmental Forensics: Focus On Emerging Contaminants*. Lecture conducted from Sheraton Oceanfront Hotel, Virginia Beach, Virginia.

Paul Rosenfeld Ph.D. (July 21-22, 2005). Fate Transport, Persistence and Toxicology of PFOA and Related Perfluorochemicals. *2005 National Groundwater Association Ground Water And Environmental Law Conference*. Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

Paul Rosenfeld Ph.D. (July 21-22, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, Toxicology and Remediation. *2005 National Groundwater Association Ground Water and Environmental Law Conference.* Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

Paul Rosenfeld, Ph.D. and James Clark Ph.D. and Rob Hesse R.G. (May 5-6, 2004). Tert-butyl Alcohol Liability and Toxicology, A National Problem and Unquantified Liability. *National Groundwater Association. Environmental Law Conference*. Lecture conducted from Congress Plaza Hotel, Chicago Illinois.

Paul Rosenfeld, Ph.D. (March 2004). Perchlorate Toxicology. *Meeting of the American Groundwater Trust*. Lecture conducted from Phoenix Arizona.

Hagemann, M.F., **Paul Rosenfeld, Ph.D.** and Rob Hesse (2004). Perchlorate Contamination of the Colorado River. *Meeting of tribal representatives*. Lecture conducted from Parker, AZ.

Paul Rosenfeld, Ph.D. (April 7, 2004). A National Damage Assessment Model For PCE and Dry Cleaners. *Drycleaner Symposium. California Ground Water Association*. Lecture conducted from Radison Hotel, Sacramento, California.

Rosenfeld, P. E., Grey, M., (June 2003) Two stage biofilter for biosolids composting odor control. *Seventh International In Situ And On Site Bioremediation Symposium Battelle Conference* Orlando, FL.

Paul Rosenfeld, Ph.D. and James Clark Ph.D. (February 20-21, 2003) Understanding Historical Use, Chemical Properties, Toxicity and Regulatory Guidance of 1,4 Dioxane. *National Groundwater Association. Southwest Focus Conference. Water Supply and Emerging Contaminants*.. Lecture conducted from Hyatt Regency Phoenix Arizona.

Paul Rosenfeld, Ph.D. (February 6-7, 2003). Underground Storage Tank Litigation and Remediation. *California CUPA Forum*. Lecture conducted from Marriott Hotel, Anaheim California.

Paul Rosenfeld, Ph.D. (October 23, 2002) Underground Storage Tank Litigation and Remediation. *EPA Underground Storage Tank Roundtable*. Lecture conducted from Sacramento California.

Rosenfeld, P.E. and Suffet, M. (October 7- 10, 2002). Understanding Odor from Compost, *Wastewater and Industrial Processes. Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

Rosenfeld, P.E. and Suffet, M. (October 7- 10, 2002). Using High Carbon Wood Ash to Control Compost Odor. *Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

Rosenfeld, P.E. and Grey, M. A. (September 22-24, 2002). Biocycle Composting For Coastal Sage Restoration. *Northwest Biosolids Management Association*. Lecture conducted from Vancouver Washington..

Rosenfeld, P.E. and Grey, M. A. (November 11-14, 2002). Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Soil Science Society Annual Conferenc*e. Lecture conducted from Indianapolis, Maryland.

Rosenfeld. P.E. (September 16, 2000). Two stage biofilter for biosolids composting odor control. *Water Environment Federation.* Lecture conducted from Anaheim California.

Rosenfeld. P.E. (October 16, 2000). Wood ash and biofilter control of compost odor. *Biofest.* Lecture conducted from Ocean Shores, California.

Rosenfeld, P.E. (2000). Bioremediation Using Organic Soil Amendments. *California Resource Recovery Association*. Lecture conducted from Sacramento California.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. *Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings*. Lecture conducted from Bellevue Washington.

Rosenfeld, P.E., and C.L. Henry. (1999). An evaluation of ash incorporation with biosolids for odor reduction. *Soil Science Society of America*. Lecture conducted from Salt Lake City Utah.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Comparison of Microbial Activity and Odor Emissions from Three Different Biosolids Applied to Forest Soil. *Brown and Caldwell.* Lecture conducted from Seattle Washington.

Rosenfeld, P.E., C.L. Henry. (1998). Characterization, Quantification, and Control of Odor Emissions from Biosolids Application To Forest Soil. *Biofest.* Lecture conducted from Lake Chelan, Washington.

Rosenfeld, P.E, C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings. Lecture conducted from Bellevue Washington.

Rosenfeld, P.E., C.L. Henry, R. B. Harrison, and R. Dills. (1997). Comparison of Odor Emissions From Three Different Biosolids Applied to Forest Soil. *Soil Science Society of America*. Lecture conducted from Anaheim California.

Teaching Experience:

UCLA Department of Environmental Health (Summer 2003 through 20010) Taught Environmental Health Science 100 to students, including undergrad, medical doctors, public health professionals and nurses. Course focused on the health effects of environmental contaminants.

National Ground Water Association, Successful Remediation Technologies. Custom Course in Sante Fe, New Mexico. May 21, 2002. Focused on fate and transport of fuel contaminants associated with underground storage tanks.

National Ground Water Association; Successful Remediation Technologies Course in Chicago Illinois. April 1, 2002. Focused on fate and transport of contaminants associated with Superfund and RCRA sites.

California Integrated Waste Management Board, April and May, 2001. Alternative Landfill Caps Seminar in San Diego, Ventura, and San Francisco. Focused on both prescriptive and innovative landfill cover design.

UCLA Department of Environmental Engineering, February 5, 2002. Seminar on Successful Remediation Technologies focusing on Groundwater Remediation.

University Of Washington, Soil Science Program, Teaching Assistant for several courses including: Soil Chemistry, Organic Soil Amendments, and Soil Stability.

U.C. Berkeley, Environmental Science Program Teaching Assistant for Environmental Science 10.

Academic Grants Awarded:

California Integrated Waste Management Board. $41,000 grant awarded to UCLA Institute of the Environment. Goal: To investigate effect of high carbon wood ash on volatile organic emissions from compost. 2001.

Synagro Technologies, Corona California: $10,000 grant awarded to San Diego State University.
Goal: investigate effect of biosolids for restoration and remediation of degraded coastal sage soils. 2000.

King County, Department of Research and Technology, Washington State. $100,000 grant awarded to University of Washington: Goal: To investigate odor emissions from biosolids application and the effect of polymers and ash on VOC emissions. 1998.

Northwest Biosolids Management Association, Washington State. $20,000 grant awarded to investigate effect of polymers and ash on VOC emissions from biosolids. 1997.

James River Corporation, Oregon: $10,000 grant was awarded to investigate the success of genetically engineered Poplar trees with resistance to round-up. 1996.

United State Forest Service, Tahoe National Forest: $15,000 grant was awarded to investigating fire ecology of the Tahoe National Forest. 1995.

Kellogg Foundation, Washington D.C. $500 grant was awarded to construct a large anaerobic digester on St. Kitts in West Indies. 1993

Deposition and/or Trial Testimony:

In the United States District Court For The District of New Jersey
Duarte et al, *Plaintiffs,* vs. United States Metals Refining Company et. al. *Defendant.*
Case No.: 2:17-cv-01624-ES-SCM
Rosenfeld Deposition. 6-7-2019

In the United States District Court of Southern District of Texas Galveston Division
M/T Carla Maersk, *Plaintiffs,* vs. Conti 168., Schiffahrts-GMBH & Co. Bulker KG MS "Conti Perdido" *Defendant.*
Case No.: 3:15-CV-00106 consolidated with 3:15-CV-00237
Rosenfeld Deposition. 5-9-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
Carole-Taddeo-Bates et al., vs. Ifran Khan et al., Defendants
Case No.: No. BC615636
Rosenfeld Deposition, 1-26-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
The San Gabriel Valley Council of Governments et al. vs El Adobe Apts. Inc. et al., Defendants
Case No.: No. BC646857
Rosenfeld Deposition, 10-6-2018; Trial 3-7-19

In United States District Court For The District of Colorado
Bells et al. Plaintiff vs. The 3M Company et al., Defendants
Case: No 1:16-cv-02531-RBJ
Rosenfeld Deposition, 3-15-2018 and 4-3-2018

In The District Court Of Regan County, Texas, 112th Judicial District
Phillip Bales et al., Plaintiff vs. Dow Agrosciences, LLC, et al., Defendants
Cause No 1923
Rosenfeld Deposition, 11-17-2017

In The Superior Court of the State of California In And For The County Of Contra Costa
Simons et al., Plaintiffs vs. Chevron Corporation, et al., Defendants
Cause No C12-01481
Rosenfeld Deposition, 11-20-2017

In The Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois
Martha Custer et al., Plaintiff vs. Cerro Flow Products, Inc., Defendants
Case No.: No. 0i9-L-2295
Rosenfeld Deposition, 8-23-2017

In The Superior Court of the State of California, For The County of Los Angeles
Warrn Gilbert and Penny Gilber, Plaintiff vs. BMW of North America LLC
Case No.: LC102019 (c/w BC582154)
Rosenfeld Deposition, 8-16-2017, Trail 8-28-2018

In the Northern District Court of Mississippi, Greenville Division
Brenda J. Cooper, et al., *Plaintiffs,* vs. Meritor Inc., et al., *Defendants*
Case Number: 4:16-cv-52-DMB-JVM
Rosenfeld Deposition: July 2017

In The Superior Court of the State of Washington, County of Snohomish
Michael Davis and Julie Davis et al., Plaintiff vs. Cedar Grove Composting Inc., Defendants
Case No.: No. 13-2-03987-5
Rosenfeld Deposition, February 2017
Trial, March 2017

In The Superior Court of the State of California, County of Alameda
Charles Spain., Plaintiff vs. Thermo Fisher Scientific, et al., Defendants
Case No.: RG14711115
Rosenfeld Deposition, September 2015

In The Iowa District Court In And For Poweshiek County
Russell D. Winburn, et al., Plaintiffs vs. Doug Hoksbergen, et al., Defendants
Case No.: LALA002187
Rosenfeld Deposition, August 2015

In The Iowa District Court For Wapello County
Jerry Dovico, et al., Plaintiffs vs. Valley View Sine LLC, et al., Defendants
Law No,: LALA105144 - Division A
Rosenfeld Deposition, August 2015

In The Iowa District Court For Wapello County
Doug Pauls, et al.,, et al., Plaintiffs vs. Richard Warren, et al., Defendants
Law No,: LALA105144 - Division A
Rosenfeld Deposition, August 2015

In The Circuit Court of Ohio County, West Virginia
Robert Andrews, et al. v. Antero, et al.
Civil Action N0. 14-C-30000
Rosenfeld Deposition, June 2015

In The Third Judicial District County of Dona Ana, New Mexico
Betty Gonzalez, et al. Plaintiffs vs. Del Oro Dairy, Del Oro Real Estate LLC, Jerry Settles and Deward DeRuyter, Defendants
Rosenfeld Deposition: July 2015

In The Iowa District Court For Muscatine County
Laurie Freeman et. al. Plaintiffs vs. Grain Processing Corporation, Defendant
Case No 4980
Rosenfeld Deposition: May 2015

In the Circuit Court of the 17th Judicial Circuit, in and For Broward County, Florida
Walter Hinton, et. al. Plaintiff, vs. City of Fort Lauderdale, Florida, a Municipality, Defendant.
Case Number CACE07030358 (26)
Rosenfeld Deposition: December 2014

In the United States District Court Western District of Oklahoma
Tommy McCarty, et al., Plaintiffs, v. Oklahoma City Landfill, LLC d/b/a Southeast Oklahoma City Landfill, et al. Defendants.
Case No. 5:12-cv-01152-C
Rosenfeld Deposition: July 2014

In the County Court of Dallas County Texas
Lisa Parr et al, *Plaintiff*, vs. Aruba et al, *Defendant.*
Case Number cc-11-01650-E
Rosenfeld Deposition: March and September 2013
Rosenfeld Trial: April 2014

In the Court of Common Pleas of Tuscarawas County Ohio
John Michael Abicht, et al., *Plaintiffs,* vs. Republic Services, Inc., et al., *Defendants*
Case Number: 2008 CT 10 0741 (Cons. w/ 2009 CV 10 0987)
Rosenfeld Deposition: October 2012

In the United States District Court of Southern District of Texas Galveston Division
Kyle Cannon, Eugene Donovan, Genaro Ramirez, Carol Sassler, and Harvey Walton, each Individually and on behalf of those similarly situated, *Plaintiffs,* vs. BP Products North America, Inc., *Defendant.*
Case 3:10-cv-00622
Rosenfeld Deposition: February 2012
Rosenfeld Trial: April 2013

In the Circuit Court of Baltimore County Maryland
Philip E. Cvach, II et al., *Plaintiffs* vs. Two Farms, Inc. d/b/a Royal Farms, Defendants
Case Number: 03-C-12-012487 OT
Rosenfeld Deposition: September 2013

EXHIBIT C

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

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Santa Monica, California 90401
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Matthew F. Hagemann, P.G., C.Hg., QSD, QSP

Geologic and Hydrogeologic Characterization
Industrial Stormwater Compliance
Investigation and Remediation Strategies
Litigation Support and Testifying Expert
CEQA Review

Education:

M.S. Degree, Geology, California State University Los Angeles, Los Angeles, CA, 1984.
B.A. Degree, Geology, Humboldt State University, Arcata, CA, 1982.

Professional Certifications:

California Professional Geologist
California Certified Hydrogeologist
Qualified SWPPP Developer and Practitioner

Professional Experience:

Matt has 25 years of experience in environmental policy, assessment and remediation. He spent nine years with the U.S. EPA in the RCRA and Superfund programs and served as EPA's Senior Science Policy Advisor in the Western Regional Office where he identified emerging threats to groundwater from perchlorate and MTBE. While with EPA, Matt also served as a Senior Hydrogeologist in the oversight of the assessment of seven major military facilities undergoing base closure. He led numerous enforcement actions under provisions of the Resource Conservation and Recovery Act (RCRA) while also working with permit holders to improve hydrogeologic characterization and water quality monitoring.

Matt has worked closely with U.S. EPA legal counsel and the technical staff of several states in the application and enforcement of RCRA, Safe Drinking Water Act and Clean Water Act regulations. Matt has trained the technical staff in the States of California, Hawaii, Nevada, Arizona and the Territory of Guam in the conduct of investigations, groundwater fundamentals, and sampling techniques.

Positions Matt has held include:

- Founding Partner, Soil/Water/Air Protection Enterprise (SWAPE) (2003 – present);
- Geology Instructor, Golden West College, 2010 – 2014;
- Senior Environmental Analyst, Komex H2O Science, Inc. (2000 -- 2003);

- Executive Director, Orange Coast Watch (2001 – 2004);
- Senior Science Policy Advisor and Hydrogeologist, U.S. Environmental Protection Agency (1989–1998);
- Hydrogeologist, National Park Service, Water Resources Division (1998 – 2000);
- Adjunct Faculty Member, San Francisco State University, Department of Geosciences (1993 – 1998);
- Instructor, College of Marin, Department of Science (1990 – 1995);
- Geologist, U.S. Forest Service (1986 – 1998); and
- Geologist, Dames & Moore (1984 – 1986).

Senior Regulatory and Litigation Support Analyst:

With SWAPE, Matt's responsibilities have included:

- Lead analyst and testifying expert in the review of over 100 environmental impact reports since 2003 under CEQA that identify significant issues with regard to hazardous waste, water resources, water quality, air quality, Valley Fever, greenhouse gas emissions, and geologic hazards. Make recommendations for additional mitigation measures to lead agencies at the local and county level to include additional characterization of health risks and implementation of protective measures to reduce worker exposure to hazards from toxins and Valley Fever.
- Stormwater analysis, sampling and best management practice evaluation at industrial facilities.
- Manager of a project to provide technical assistance to a community adjacent to a former Naval shipyard under a grant from the U.S. EPA.
- Technical assistance and litigation support for vapor intrusion concerns.
- Lead analyst and testifying expert in the review of environmental issues in license applications for large solar power plants before the California Energy Commission.
- Manager of a project to evaluate numerous formerly used military sites in the western U.S.
- Manager of a comprehensive evaluation of potential sources of perchlorate contamination in Southern California drinking water wells.
- Manager and designated expert for litigation support under provisions of Proposition 65 in the review of releases of gasoline to sources drinking water at major refineries and hundreds of gas stations throughout California.
- Expert witness on two cases involving MTBE litigation.
- Expert witness and litigation support on the impact of air toxins and hazards at a school.
- Expert witness in litigation at a former plywood plant.

With Komex H2O Science Inc., Matt's duties included the following:

- Senior author of a report on the extent of perchlorate contamination that was used in testimony by the former U.S. EPA Administrator and General Counsel.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of MTBE use, research, and regulation.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of perchlorate use, research, and regulation.
- Senior researcher in a study that estimates nationwide costs for MTBE remediation and drinking water treatment, results of which were published in newspapers nationwide and in testimony against provisions of an energy bill that would limit liability for oil companies.
- Research to support litigation to restore drinking water supplies that have been contaminated by MTBE in California and New York.

- Expert witness testimony in a case of oil production-related contamination in Mississippi.
- Lead author for a multi-volume remedial investigation report for an operating school in Los Angeles that met strict regulatory requirements and rigorous deadlines.

- Development of strategic approaches for cleanup of contaminated sites in consultation with clients and regulators.

Executive Director:

As Executive Director with Orange Coast Watch, Matt led efforts to restore water quality at Orange County beaches from multiple sources of contamination including urban runoff and the discharge of wastewater. In reporting to a Board of Directors that included representatives from leading Orange County universities and businesses, Matt prepared issue papers in the areas of treatment and disinfection of wastewater and control of the discharge of grease to sewer systems. Matt actively participated in the development of countywide water quality permits for the control of urban runoff and permits for the discharge of wastewater. Matt worked with other nonprofits to protect and restore water quality, including Surfrider, Natural Resources Defense Council and Orange County CoastKeeper as well as with business institutions including the Orange County Business Council.

Hydrogeology:

As a Senior Hydrogeologist with the U.S. Environmental Protection Agency, Matt led investigations to characterize and cleanup closing military bases, including Mare Island Naval Shipyard, Hunters Point Naval Shipyard, Treasure Island Naval Station, Alameda Naval Station, Moffett Field, Mather Army Airfield, and Sacramento Army Depot. Specific activities were as follows:

- Led efforts to model groundwater flow and contaminant transport, ensured adequacy of monitoring networks, and assessed cleanup alternatives for contaminated sediment, soil, and groundwater.
- Initiated a regional program for evaluation of groundwater sampling practices and laboratory analysis at military bases.
- Identified emerging issues, wrote technical guidance, and assisted in policy and regulation development through work on four national U.S. EPA workgroups, including the Superfund Groundwater Technical Forum and the Federal Facilities Forum.

At the request of the State of Hawaii, Matt developed a methodology to determine the vulnerability of groundwater to contamination on the islands of Maui and Oahu. He used analytical models and a GIS to show zones of vulnerability, and the results were adopted and published by the State of Hawaii and County of Maui.

As a hydrogeologist with the EPA Groundwater Protection Section, Matt worked with provisions of the Safe Drinking Water Act and NEPA to prevent drinking water contamination. Specific activities included the following:

- Received an EPA Bronze Medal for his contribution to the development of national guidance for the protection of drinking water.
- Managed the Sole Source Aquifer Program and protected the drinking water of two communities through designation under the Safe Drinking Water Act. He prepared geologic reports, conducted public hearings, and responded to public comments from residents who were very concerned about the impact of designation.

- Reviewed a number of Environmental Impact Statements for planned major developments, including large hazardous and solid waste disposal facilities, mine reclamation, and water transfer.

Matt served as a hydrogeologist with the RCRA Hazardous Waste program. Duties were as follows:

- Supervised the hydrogeologic investigation of hazardous waste sites to determine compliance with Subtitle C requirements.
- Reviewed and wrote "part B" permits for the disposal of hazardous waste.
- Conducted RCRA Corrective Action investigations of waste sites and led inspections that formed the basis for significant enforcement actions that were developed in close coordination with U.S. EPA legal counsel.
- Wrote contract specifications and supervised contractor's investigations of waste sites.

With the National Park Service, Matt directed service-wide investigations of contaminant sources to prevent degradation of water quality, including the following tasks:

- Applied pertinent laws and regulations including CERCLA, RCRA, NEPA, NRDA, and the Clean Water Act to control military, mining, and landfill contaminants.
- Conducted watershed-scale investigations of contaminants at parks, including Yellowstone and Olympic National Park.
- Identified high-levels of perchlorate in soil adjacent to a national park in New Mexico and advised park superintendent on appropriate response actions under CERCLA.
- Served as a Park Service representative on the Interagency Perchlorate Steering Committee, a national workgroup.
- Developed a program to conduct environmental compliance audits of all National Parks while serving on a national workgroup.
- Co-authored two papers on the potential for water contamination from the operation of personal watercraft and snowmobiles, these papers serving as the basis for the development of nation-wide policy on the use of these vehicles in National Parks.
- Contributed to the Federal Multi-Agency Source Water Agreement under the Clean Water Action Plan.

Policy:

Served senior management as the Senior Science Policy Advisor with the U.S. Environmental Protection Agency, Region 9. Activities included the following:

- Advised the Regional Administrator and senior management on emerging issues such as the potential for the gasoline additive MTBE and ammonium perchlorate to contaminate drinking water supplies.
- Shaped EPA's national response to these threats by serving on workgroups and by contributing to guidance, including the Office of Research and Development publication, Oxygenates in Water: Critical Information and Research Needs.
- Improved the technical training of EPA's scientific and engineering staff.
- Earned an EPA Bronze Medal for representing the region's 300 scientists and engineers in negotiations with the Administrator and senior management to better integrate scientific principles into the policy-making process.
- Established national protocol for the peer review of scientific documents.

Geology:

With the U.S. Forest Service, Matt led investigations to determine hillslope stability of areas proposed for timber harvest in the central Oregon Coast Range. Specific activities were as follows:

- Mapped geology in the field, and used aerial photographic interpretation and mathematical models to determine slope stability.
- Coordinated his research with community members who were concerned with natural resource protection.
- Characterized the geology of an aquifer that serves as the sole source of drinking water for the city of Medford, Oregon.

As a consultant with Dames and Moore, Matt led geologic investigations of two contaminated sites (later listed on the Superfund NPL) in the Portland, Oregon, area and a large hazardous waste site in eastern Oregon. Duties included the following:

- Supervised year-long effort for soil and groundwater sampling.
- Conducted aquifer tests.
- Investigated active faults beneath sites proposed for hazardous waste disposal.

Teaching:

From 1990 to 1998, Matt taught at least one course per semester at the community college and university levels:

- At San Francisco State University, held an adjunct faculty position and taught courses in environmental geology, oceanography (lab and lecture), hydrogeology, and groundwater contamination.
- Served as a committee member for graduate and undergraduate students.
- Taught courses in environmental geology and oceanography at the College of Marin.

Matt taught physical geology (lecture and lab and introductory geology at Golden West College in Huntington Beach, California from 2010 to 2014.

Invited Testimony, Reports, Papers and Presentations:

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Presentation to the Public Environmental Law Conference, Eugene, Oregon.

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Invited presentation to U.S. EPA Region 9, San Francisco, California.

Hagemann, M.F., 2005. Use of Electronic Databases in Environmental Regulation, Policy Making and Public Participation. Brownfields 2005, Denver, Coloradao.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Nevada and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Las Vegas, NV (served on conference organizing committee).

Hagemann, M.F., 2004. Invited testimony to a California Senate committee hearing on air toxins at schools in Southern California, Los Angeles.

Brown, A., Farrow, J., Gray, A. and **Hagemann, M.**, 2004. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to the Ground Water and Environmental Law Conference, National Groundwater Association.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Arizona and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Phoenix, AZ (served on conference organizing committee).

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in the Southwestern U.S. Invited presentation to a special committee meeting of the National Academy of Sciences, Irvine, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a tribal EPA meeting, Pechanga, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a meeting of tribal repesentatives, Parker, AZ.

Hagemann, M.F., 2003. Impact of Perchlorate on the Colorado River and Associated Drinking Water Supplies. Invited presentation to the Inter-Tribal Meeting, Torres Martinez Tribe.

Hagemann, M.F., 2003. The Emergence of Perchlorate as a Widespread Drinking Water Contaminant. Invited presentation to the U.S. EPA Region 9.

Hagemann, M.F., 2003. A Deductive Approach to the Assessment of Perchlorate Contamination. Invited presentation to the California Assembly Natural Resources Committee.

Hagemann, M.F., 2003. Perchlorate: A Cold War Legacy in Drinking Water. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. From Tank to Tap: A Chronology of MTBE in Groundwater. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. A Chronology of MTBE in Groundwater and an Estimate of Costs to Address Impacts to Groundwater. Presentation to the annual meeting of the Society of Environmental Journalists.

Hagemann, M.F., 2002. An Estimate of the Cost to Address MTBE Contamination in Groundwater (and Who Will Pay). Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to a meeting of the U.S. EPA and State Underground Storage Tank Program managers.

Hagemann, M.F., 2001. From Tank to Tap: A Chronology of MTBE in Groundwater. Unpublished report.

Hagemann, M.F., 2001. Estimated Cleanup Cost for MTBE in Groundwater Used as Drinking Water. Unpublished report.

Hagemann, M.F., 2001. Estimated Costs to Address MTBE Releases from Leaking Underground Storage Tanks. Unpublished report.

Hagemann, M.F., and VanMouwerik, M., 1999. Potential Water Quality Concerns Related to Snowmobile Usage. Water Resources Division, National Park Service, Technical Report.

VanMouwerik, M. and **Hagemann, M.F**. 1999, Water Quality Concerns Related to Personal Watercraft Usage. Water Resources Division, National Park Service, Technical Report.

Hagemann, M.F., 1999, Is Dilution the Solution to Pollution in National Parks? The George Wright Society Biannual Meeting, Asheville, North Carolina.

Hagemann, M.F., 1997, The Potential for MTBE to Contaminate Groundwater. U.S. EPA Superfund Groundwater Technical Forum Annual Meeting, Las Vegas, Nevada.

Hagemann, M.F., and Gill, M., 1996, Impediments to Intrinsic Remediation, Moffett Field Naval Air Station, Conference on Intrinsic Remediation of Chlorinated Hydrocarbons, Salt Lake City.

Hagemann, M.F., Fukunaga, G.L., 1996, The Vulnerability of Groundwater to Anthropogenic Contaminants on the Island of Maui, Hawaii. Hawaii Water Works Association Annual Meeting, Maui, October 1996.

Hagemann, M. F., Fukanaga, G. L., 1996, Ranking Groundwater Vulnerability in Central Oahu, Hawaii. Proceedings, Geographic Information Systems in Environmental Resources Management, Air and Waste Management Association Publication VIP-61.

Hagemann, M.F., 1994. Groundwater Characterization and Cleanup at Closing Military Bases in California. Proceedings, California Groundwater Resources Association Meeting.

Hagemann, M.F. and Sabol, M.A., 1993. Role of the U.S. EPA in the High Plains States Groundwater Recharge Demonstration Program. Proceedings, Sixth Biennial Symposium on the Artificial Recharge of Groundwater.

Hagemann, M.F., 1993. U.S. EPA Policy on the Technical Impracticability of the Cleanup of DNAPL-contaminated Groundwater. California Groundwater Resources Association Meeting.

Hagemann, M.F., 1992. Dense Nonaqueous Phase Liquid Contamination of Groundwater: An Ounce of Prevention... Proceedings, Association of Engineering Geologists Annual Meeting, v. 35.

Other Experience:

Selected as subject matter expert for the California Professional Geologist licensing examination, 2009-2011.

EXHIBIT D

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

Civil Division

Central District, Stanley Mosk Courthouse, Department 54

21STCP02223 March 9, 2023
HI POINT NEIGHBORS' ASSOCIATION, AN UNINCORPORATED ASSOCIATION vs CITY OF LOS ANGELES, A MUNICIPAL CORPORATION 4:05 PM

Judge: Honorable Maurice A. Leiter
Judicial Assistant: N. Marshalian
Courtroom Assistant: None

CSR: None
ERM: None
Deputy Sheriff: None

APPEARANCES:

For Plaintiff(s): No Appearances

For Defendant(s): No Appearances

NATURE OF PROCEEDINGS: Ruling on Submitted Matter

The Court, having taken the matter under submission on 03/06/2023 for Non-Jury Trial, now rules as follows:

Ruling on Submitted Matter

Trial Date: March 6, 2023
Department 54, Judge Maurice Leiter
First Amended Petition for Writ of Mandate
Moving Party: Petitioner, Hi Point Neighbors' Association
Responding Parties: Respondent, City of Los Angeles; Real Party in Interest, Hi Point M, LLC

Ruling: THE FIRST AMENDED PETITION FOR WRIT OF MANDATE IS GRANTED IN PART AND DENIED IN PART.

The Court posted its tentative decision on this matter on February 28, 2023. Trial (in the form of oral argument) was held on March 6, 2023, after which the Court took the matter under submission. This is the Court's ruling on the merits.

I. STATEMENT OF FACTS

A. Measure JJJ, Transit Oriented Communities Affordable Housing Incentive Program

On November 8, 2016, Los Angeles County voters adopted Measure JJJ. (AR 6655-6676.) Measure JJJ sought to address the acute shortage of affordable housing for unhoused and low-income persons, following the dissolution of the Community Redevelopment Agency (which had

provided funding for low- and moderate-income housing), and considering the County's outdated General Plan and zoning designations, which failed to address affordable housing challenges. (AR 6656.)

Measure JJJ contained an incentive program to encourage the development of affordable housing. It sought to spur development of affordable housing in strategic locations, such as near major transit stops, where residents are susceptible to displacement as property values and rents rise. (Ibid.) And it created the Transit Oriented Communities ("TOC") Affordable Housing Incentive Program to provide developers with incentives to develop affordable housing in transit-oriented neighborhoods. (AR 6657.)

On December 13, 2016, the Los Angeles Municipal Code was amended to codify Measure JJJ and the TOC Affordable Housing Incentive Program, in Municipal Code section 12.22 A.31. (Resp. Request for Judicial Notice ("Resp. RJN"), Ex. B at pp. 75-77.) This Code section provides incentives to housing developments "located within a one-half mile radius [2,640 feet] of a Major Transit Stop," defined by California Public Resources Code section 21064.3 as "[t]he intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute hours." (Id., Ex. B at p. 75; AR 6947; Pub. Resources Code, § 21064.3, subd. (c).) The incentives include residential density increases and parking reductions. (Id., Ex. B at p. 76.) It directs, "[w]ithin 90 days of enactment of this Ordinance, the Director of Planning [to] prepare TOC Affordable Housing Incentive Program Guidelines ("TOC Guidelines") that provide the eligibility standards, incentives, and other necessary components of this TOC Incentive Program described herein." (Ibid.)

On May 25, 2017, the Los Angeles City Planning Commission adopted TOC Guidelines. (AR 6939.) The TOC Guidelines specify that only affordable housing developments located within a one-half mile radius of a "major transit stop" qualify for the incentives. (AR 6947.) They establish a "Tier" system, which provides a ranking (Tier 1-4) to each eligible affordable housing based on its proximity to a "major transit stop." (Ibid.) Pertinent to the matter before the Court, the TOC Guidelines provide that affordable housing developments will be ranked as "Tier 3" where (a) the development is located within 750 feet of an intersection of a Regular Bus and Rapid Bus Line; or (b) the development is located within 1,500 feet of an intersection of two Rapid Bus lines. (AR 6948.) The TOC Guidelines define a "Rapid Bus" as "a higher-quality bus service that may include dedicated bus lanes, branded vehicles and stations, high frequency, limited stops at major intersections, intelligent transportation systems, and possible off-board fare collection and/or all door boarding. It includes Metro Bus Rapid Transit line, Metro Rapid

700 lines, Metro Orange and Silver Lines, Big Blue Rapid lines, and the Rapid 6 Culver City. (Ibid.)

The TOC Guidelines state that all eligible affordable housing developments will receive "Base Incentives," which are residential density increases (an increase in the number of dwelling units permitted under the applicable zoning ordinance, and an increase in the floor area ratio permitted under the applicable zoning ordinance), and parking reductions (a decrease in the number of parking spaces required under the applicable zoning ordinance). (AR 6950, 6952-6954.) The degree of the reduction and/or increase permitted is determined by Tier ranking. (Ibid.) And the TOC Guidelines provide that eligible affordable housing developments may be granted "[u]p to three Additional Incentives" (AR 6950.), including reductions in yards/setbacks, decreases in open space, increases in maximum lot coverage, decreases in lot width, and increases in development height. (AR 6954-6957.)

B. Project and Project Site

The proposed project at issue here concerns a rectangular-shaped lot at 1447 South Hi Point Street in Los Angeles ("Project Site"), near the intersection of Pico Boulevard and Fairfax Avenue. (AR 18.) The Project Site is approximately 8,839 square feet and currently has a single-family residence. (Ibid.) The Project Site is in the Wilshire Community Plan Area and is zoned [Q]R3-1-O, with a land use designation of "Medium Residential." (Ibid.) Under its current zoning, building height is limited to 35 feet, articulation is required every 30 feet for building facades exceeding 40 feet, and balconies above the first floor which have a line of sight to adjacent homes are prohibited. (Ibid.)

The proposed Project would demolish the single-family home and construct a five-story, 57-foot-high multi-family residential development above one level of subterranean parking. (AR 18.) It will contain 20 multi-family dwelling units: two one-bedroom units, ten two-bedroom units, and eight three-bedroom units. (Ibid.) It would provide 24 parking spaces, 20 long-term bicycle parking spaces, and two short-term bicycle parking spaces. (Ibid.) The building will encompass approximately 20,093 square feet in total building area, with a floor area ratio of approximately 3.78:1. (Ibid.)

The properties surrounding the Project Site generally are commercial, single-family residences, and multi-family residential uses. (AR 18.) Properties abutting the Project Site to the west are zoned [Q]R3-1-O and contain three- and four-story apartment buildings. (Ibid.) Properties to the

east of the Project Site, across Hi Point Street, are also zoned [Q]R3-1-O and are developed with one- to four- story single-family homes, condominiums, and small lot buildings. (Ibid.) Properties to the north of the Project Site are zoned [Q]R3-1-O and C4-1-O and include both single-family and multi-family residential structures, as well as a McDonald's Drive-Thru restaurant and a commercial strip mall. (Ibid.) Properties to the south of the Project Site, across Saturn Street, are zoned [Q]R3-1-O and R1R3-RG-O and include a mix of single-family residences and multi-story apartment buildings. (Ibid.)

Public buses operate nearby on Pico Boulevard and Fairfax Avenue. (AR 2959.)

C. Administrative History and Approval

On February 27, 2020, Hi Point M, LLC ("Real Party in Interest") submitted a "Transit-Oriented Communities Referral Form" to the Department of City Planning, which asked the Department to determine whether the Project qualified for incentives under the TOC Affordable Housing Incentive Program and, if so, under which "Tier" the Project may be categorized. (AR 619.) On the same day, the Department concluded that the Project qualified for incentives, because the Project was within a half-mile radius of a "Major Transit Stop." The Department noted, "Santa Monica [Big Blue Bus] 7" and "[Rapid] 7" travel through the intersection [at Pico and Fairfax] and have service intervals of less than 15 minutes. (Ibid.) The Department also noted that "Local Line 217" and "Rapid 780" travel through the intersection and have service intervals of 14.4 minutes and 12.7 minutes, respectively. (Ibid.) The Department concluded the Project qualified for "Tier 3" categorization because it was (a) within 750 feet of an intersection of a Regular Bus and Rapid Bus Line, or (b) within 1,500 feet of an intersection of two Rapid Bus lines. (AR 619, 6948.)

On May 24, 2020, Real Party in Interest submitted a "Department of City Planning Application" requesting approval of the Project and the issuance of incentives under the TOC Affordable Housing Incentive Program. (AR 646-652.) Real Party in Interest sought: (a) 70% Density Bonus; (b) 50% Floor Area Ratio increase, (c) Parking reduction to .5 spots per unit; (d) 22 feet height increase; (e) 25% open space reduction; and (f) 30% side yard setback reduction. (AR 647.)

On December 30, 2020, the Director of the Department of City Planning approved the application. (AR 2954-2955.) The Director determined the Project is in a "Tier 3" Incentive Area and approved these "Base Incentives:" (a) a density increase of 70 percent, which equates to a

maximum density of 21 residential dwelling units; (b) a maximum floor area ration of 4.5 to 1, representing a 50 percent increase in the floor area ratio of the underlying residential zone; and (c) .5 automobile parking spaces per unit. (AR 2955-2956.) The Director also approved these "Additional Incentives:" (a) a 30 percent reduction in the required width of two side yards to provide a minimum setback of five feet eight inches in lieu of the minimum eight feet; (b) an increase of 22 feet in building height, equal to a maximum building height of 57 feet, with limited additional height permitted for roof structures, stairwells, elevator shafts, etc. as permitted by the Los Aneles Municipal Code; and (c) a maximum reduction of 25 percent in the required amount of open space. (AR 2956.) And the Director concluded that the Project was exempt from CEQA pursuant to the "Class 32" Categorical Exemption. (AR 2954.)

On January 13, 2021, nearby residents filed a total of five appeals from the Director's approval of the Project. (AR 22.) The residents' appeals challenged: (a) The Director's conclusion the Project is located in a "Tier 3" TOC Affordable Housing Incentive Area; (b) The Director's conclusion the Project is exempt from CEQA pursuant to the "Class 32" Categorical Exemption, because the Project will have significant impacts on noise and traffic conditions; (c) whether The Project complies with the Qualified "Q" Conditions of the Project Site's [Q]R3-1-O zoning; and (d) whether the height of the Project is incompatible with the surrounding neighborhood and will result in loss of sunlight, properly values, and community character. (AR 22-25.)

In response to these appeals the Department of City Planning drafted an "Appeals Recommendation Report", which recommended that the appeals be denied. (AR 22-25.) The Report concluded that: (a) While the Project Site may not be located within 750 feet from a Major Transit Stop, "the project [remains] qualified for Tier 3 TOC status by proximity to a Major Transit Stop involving the intersection of two or more rapid bus routes located within 1,500 feet of the subject property" (rapid bus routes, Santa Monica Big Blue Bus Rapid 7 Line and Metro Rapid Line 780); (b) The Project is exempt from CEQA as it satisfied the five requirements applicable to the "Class 32" Categorical Exemption; (c) The Project is in compliance with the Qualified "Q" Condition; and (d) The Project's height is not incompatible with the surrounding neighborhood. (AR 22-25.)

On April 8, 2021, the City Planning Commission adopted the Department of City Planning's recommendation and denied the appeals. (AR 288.)

On April 13, 2021, two residents filed a CEQA appeal of the "Class 32" Categorical Exemption finding. (Ibid.) On August 31, 2021, the Planning and Land Use Management ("PLUM")

Committee, following a hearing, recommended the City Council deny the residents' appeal. (AR 295-296.) On September 15, 2021, the City Council adopted the PLUM Committee's recommendation and denied the CEQA appeal. (AR 317.)

II. THE PETITION AT ISSUE HERE

On July 12, 2021, Hi Point Neighbors' Association ("Petitioner") filed a Verified Petition for Writ of Mandate against City of Los Angeles ("Respondent"). On November 10, 2021, Petitioner filed the operative Verified First Amended Petition for Writ of Mandate. This Petition has three causes of action: (1) Violation of Local Zoning—As Applied Challenge to TOC Guidelines; (2) Violation of Local Zoning Law—Project Inconsistent with TOC Guidelines; and (3) Violation of California Environmental Quality Act—Improper Adoption of Exemption.

III. REQUEST FOR JUDICIAL NOTICE

Petitioner's Request for Judicial Notice is GRANTED, pursuant to Evidence Code section 452, subdivisions (a), (b), and (h).

Respondent's Request for Judicial Notice is GRANTED, pursuant to Evidence Code section 452, subdivisions (a) and (b).

Real Party in Interest's Request for Judicial Notice is GRANTED, pursuant to Evidence Code section 452, subdivision (c).

Respondent's Supplemental Request for Judicial Notice is GRANTED, pursuant to Evidence Code section 452, subdivision (c).

IV. STANDARD OF REVIEW

Each of the three causes of action require a different standard of review.

A. First Cause of Action: As-Applied Challenge to TOC Guidelines

The First Cause of Action is a challenge to the TOC Guidelines. Petitioner argues the TOC Guidelines are invalid as exceeding the scope of Measure JJJ. (FAP, ¶¶ 32-33.) First, Petitioner contends the "Tiers" in the TOC Guidelines were not permitted by Measure JJJ. (FAP, ¶ 35.)

Second, Petitioner contends the "Additional Incentives" in the TOC Guidelines exceed the incentives permitted by Measure JJJ. (FAP, ¶¶ 32-33.) Third, Petitioner argues the TOC Guidelines improperly allow open space reductions and height increases which override [Q] Conditions (such as design guidelines) applicable to the Project Site by Ordinance Number 168193. (FAP, ¶ 38.) Petitioner contends the TOC Guidelines are invalid as exceeding those authorized by Measure JJJ.

These are both facial and as-applied challenges. Petitioner challenges the TOC Guidelines as not authorized by Measure JJJ, and challenges them on the ground that their application resulted in the issuance of invalid "conditions of approval" to the Project. (FAP, ¶ 37.) A facial challenge to a statute or local ordinance contends "'the alleged defect is in the [O]rdinance itself, not in the manner or circumstances in which it is being applied.'" (County of Sonoma v. Superior Court (2010) 190 Cal.App.4th 1312, 1324.) "'In evaluating a facial challenge, a court considers "only the text of the [challenged enactment] itself,"' and conducts statutory interpretation to determine the enactment's validity. (Beach & Bluff Conservany v. City of Solana Beach (2018) 28 Cal.App.5th 244, 264.) An as-applied challenge asserts the enforcement of a particular statute or ordinance is invalid. (Howard Jarvis Taxpayers Assn. v. Weber (2021) 67 Cal.App.5th 488, 496.)

The California Supreme Court similarly found a combined facial and as-applied challenge in Travis v. County of Santa Cruz (2004) 33 Cal.4th 757, 767.) The Ordinance at issue there permitted County residents to develop a second dwelling unit on their property so long as the rent charged for the second dwelling unit did not exceed that established by the Section 8 Program or Chapter 17.1 of the County Code, whichever higher, and the resident of the second dwelling unit was a low-income resident, an elderly resident, or a family member of the owner of the unit. (Id. at p. 763.) Travis owned a residential property in the County of Santa Cruz. (Id. at p. 764.) He was granted a permit to construct a second dwelling unit on his proper, subject to the rent and resident conditions imposed by the Ordinance. (Ibid.) Travis filed a Petition for Writ of Mandate against the County of Santa Cruz, challenging the Ordinance on the ground that it violated state law and is unconstitutional.

The Supreme Court found that the petition presented a facial challenge to the Ordinance as invalid and unconstitutional. It also presented an as-applied challenge to the Ordinance, as it placed allegedly improper conditions on his second dwelling unit. (Travis, supra, 33 Cal.4th at p. 767.)
The interpretation of a legislative enactment and the determination of the enactment's validity is reviewed de novo. (Beach & Bluff Conservancy, supra, 28 Cal.App.5th at p. 264.) To prevail on

an as applied challenge, a plaintiff must demonstrate that the application of the statute deprived the individual of a protected right. (Allen v. City of Sacramento (2015) 234 Cal.App.4th 41, 56.) In either case, the Court begins from "'the strong presumption that the ordinance is . . . valid.' [Citations.]" (Building Industry Assn. of Bay Area v. City of San Ramon (2016) 4 Cal.App.5th 62, 90.) The court "'resolve[s] all doubts in favor of the validity of the ordinance.' [Citation.]" (Ibid.) Unless conflict between the two provisions is "clear and unmistakable", the court must uphold the ordinance. (Ibid.) Petitioner bears the burden of demonstrating the ordinance is invalid. (Ibid.)

B. Second Cause of Action: Challenge to Respondent's Tier 3 Finding under TOC Guidelines

The Second Cause of Action alleges that Respondent's conclusion that the Project qualifies for "Tier 3" is not supported by the evidence. (FAP, ¶¶ 39-60.) It is undisputed that this cause of action is governed by Code of Civil Procedure section 1094.5. (Code Civ. Proc., § 1094.5.)

Code of Civil Procedure "section 1094.5, subdivision (c), does not establish a single standard for judicial review of the evidentiary basis for agency determinations." (Bixby v. Pierno (1971) 4 Cal.3d 130, 137; Code Civ. Proc., § 1094.5, subd. (c).) It articulates two possible standards of review: independent judgment and substantial evidence. (Code Civ. Proc., § 1094.5, subd. (c).) The independent judgment standard applies where an administrative agency's decision "substantially affects a fundamentally vested right." (Bixby, supra, 3 Cal.3d at p. 144.) In all other scenarios, where an agency's decision does not "substantially affect a fundamentally vested right," the substantial evidence standard applies. (Ibid.) "The courts must decide on a case-by-case basis whether an administrative decision or class of decisions substantially affects fundamental vested rights . . . ." (Ibid.)

Petitioner does not advance any substantive arguments that approval of the Project "substantially affects a fundamentally vested right." Petitioner's Opening Brief contains a single, conclusory sentence asserting that the Second Cause of Action is subject to independent judgment review. (OB, at p. 12:19-26.) The Court disagrees. The substantial evidence standard of review is applicable to Petitioner's Second Cause of Action.

Under the substantial evidence standard of review the Court must "examine all relevant evidence in the entire record, considering both the evidence that supports the administrative decision and the evidence against it, in order to determine whether or not the agency decision is supported by 'substantial evidence.'" [Citation.]" (Desmond v. County of Contra Costa (1993) 21 Cal.App.4th

330, 335.) "[T]he petitioner in an administrative mandamus proceeding has the burden of proving that the agency's decision was invalid and should be set aside, because it is presumed that the agency regularly performed its official duty. When the standard of review is the substantial evidence test . . . it is presumed that the findings and actions of the administrative agency were supported by substantial evidence. [Citations.]" (Desmond, supra, 21 Cal.App.4th at pp. 335-336.) The court's review "is not designed to rectify an imprudent decision by an administrative agency. Administrative mandamus is not to be used to control the discretion of an administrative body, but only to ensure that it was not abused. [Citations.] It is for the agency to weigh the preponderance of conflicting evidence, 'as we may reverse its decision only if, based on the evidence before [the agency], a reasonable person could not have reached the conclusion reached by [the agency].' [Citations.]" (Young v. City of Coronado (2017) 10 Cal.App.5th 408, 419.)

C. Third Cause of Action: Challenge to Respondent's CEQA Exemption Finding

The Third Cause of Action is brought under the California Environmental Quality Act ("CEQA"). "CEQA is a comprehensive scheme designed to provide long-term protection to the environment." (Mt. Lion Found. v. Fish & Game Com. (1997) 16 Cal.4th 105, 112.) "In enacting CEQA, the Legislature declared its intention that all public agencies responsible for regulating activities affecting the environment give prime consideration to preventing environmental damage when carrying out their duties." (Ibid.) "CEQA is to be interpreted to afford the fullest possible protection to the environment within the reasonable scope of the statutory language." (Ibid.)

"In order to ensure that the long-term protection of the environment, consistent with the provision of a decent home and suitable living environment for every Californian, shall be the guiding criterion in public decisions, CEQA and its implementing administrative regulations (CEQA Guidelines) establish a three-tier process to ensure that public agencies inform their decisions with environmental considerations." (Muzzy Ranch Co. v. Solano County Airport Land Use Com'n (2007) 41 Cal.4th 372, 379-80.)

The Court's inquiry here involves the "second tier." "The second tier concerns exemptions from CEQA review." (Muzzy Ranch Co., supra, 41 Cal.4th at p. 380.) In enacting CEQA, the California Legislature recognized that not all "projects" will have a significant effect on the environment, and, therefore, should not be subject to the regulations imposed by CEQA. (Berkeley Hillside Preservation v. City of Berkeley (2015) 60 Cal.4th 1086, 1100-1101.) The

Legislature instructed the Office of Planning and Research to "prepare and develop proposed guidelines for the implementation of [CEQA]", which "shall include a list of classes of projects that have been determined not to have a significant effect on the environment and that shall be exempt from [CEQA review]. In adopting the guidelines, the Secretary of the Natural Resources Agency shall make a finding that the listed classes of projects referred to in this section do not have a significant effect on the environment." (Pub. Resources Code, §§ 21083, 21084.) "In response to [the California Legislature's] mandate," the Secretary of the Natural Resources Agency has concluded that thirty-three (33) categories of "projects" "do not have a significant effect on the environment" and "are declared to be categorically exempt from the provisions of CEQA." (CEQA Guidelines, §15300.) Where a public agency properly finds that a proposed "project" falls into one of the thirty-three (33) categorical exemptions articulated within the CEQA Guidelines, "no further environmental review is necessary." (Muzzy Ranch, supra, 41 Cal.4th at 380.) "The agency need only prepare and file a notice of exemption (see CEQA Guidelines, §§ 15061, subd. (d), 15062, subd. (a)), citing the relevant statute or section of the CEQA Guidelines and including a brief statement of reasons to support the finding of an exemption (id., § 15062, subd. (a)(4))." (Ibid.)

An agency's finding that a proposed project is categorically exempt from CEQA review is reviewed for a prejudicial abuse of discretion. (Pub. Resources Code, § 21168.5. "Abuse of discretion is established if the agency has not proceeded in a manner required by law or if the determination or decision is not supported by substantial evidence." (Ibid.; see also Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova (2007) 40 Cal.4th 412, 435.) "'[O]nce an agency . . . determines, based on substantial evidence in the record, that the project falls within a categorical exemption . . ., the burden shifts to the challenging party . . . to "'produce substantial evidence . . .'" [citations] . . . that one of the exceptions to [the] categorical exemption applies.' [Citation.]" (CREED-21 v. City of San Diego (2015) 234 Cal.App.4th 488, 514; see Berkeley Hillside, supra, 60 Cal.4th at p. 1105 ["As to projects that meet the requirements of a categorical exemption, a party challenging the exemption has the burden of producing evidence supporting an exception."].)
V. ANALYSIS

Petitioner challenges Respondent's approval of the Project on three grounds. First, Petitioner contends Respondent's award of "Additional Incentives" pursuant to the TOC Guidelines was improper because the Guidelines are invalid on their face and as applied. Second, Petitioner argues that Respondent's finding that the Project qualifies for "Tier 3" incentives is not supported by substantial evidence. Third, Petitioner says Respondent's determination that the

Project qualifies for a "Class 32" Categorical Exemption under CEQA is not supported by substantial evidence. The Court addresses each claim in turn.

A. First Cause of Action—Petitioner's Challenge to TOC Guidelines

Petitioner raises three facial and as-applied challenges to the TOC Guidelines. Petitioner contends the TOC Guidelines' "Tier" system was not contemplated by Measure JJJ. Second, Petitioner says Measure JJJ did not contemplate the award of "Additional Incentives." Third, Petitioner contends the incentives are inconsistent with the [Q] Conditions applicable to the Project Site.

Before reaching these arguments, the Court addresses Respondent's argument that the first cause of action is barred by the statute of limitations.

1. Petitioner's First Cause of Action is Not Barred by Statute of Limitations

Respondent argues that First Cause of Action is untimely under Government Code section 65009, subdivision (c)(1)(B), which creates a 90-day statute of limitations period for actions or proceedings challenging several types of local planning and zoning decisions. (Gov. Code, § 65009, subd. (c)(1).) Pertinent here are actions described in Government Code section 65009, subdivision (c)(1)(B) and (c)(1)(E):

(c)(1) Except as provided in subdivision (d), no action or proceeding shall be maintained in any of the following cases by any person unless the action or proceeding is commenced and service is made on the legislative body within 90 days after the legislative body's decision:
. . .

(B) To attack, review, set aside, void, or annul the decision of a legislative body to adopt or amend a zoning ordinance.
. . .

(E) To attack, review, set aside, void, or annul any decision on the matters listed in Sections 65901 and 65903, or to determine the reasonableness, legality, or validity of any condition attached to a variance, conditional use permit, or any other permit.

(Gov. Code, § 65009, subd. (c)(1)(B), (c)(1)(E).) The Court of Appeal in County of Sonoma v.

Superior Court (2010) 190 Cal.App.4th 1312, 1324 stated: "[t]he limitations periods set out in the statute are triggered by specific acts of local land use planning authorities. [Citation.] For the actions described in section 65009, subdivision (c)(1) the 90-day limitations period begins to run from the date on which the challenged decision is made. [Citation.] Thus, where a party brings a facial challenge to a zoning ordinance, [the limitations period described in Government Code section 65009, subdivision (c)(1)(B) is applicable, and] the limitation period begins to run on the date the ordinance becomes effective. [Citation.] If a party challenges conditions attached to a conditional use permit or other permit, [the limitations period described in Government Code section 65009, subdivision (c)(1)(E) is applicable, and] the limitations period runs from the date of final administrative action on the permit." (County of Sonoma, supra, 190 Cal.App.4th at p. 1324.) Therefore, to determine when the statute of limitations begins to run, "one must determine what specific governmental act or acts the [party] . . . sought to challenge." (Ibid.)

Respondent argues that Petitioner's First Cause of Action presents only a facial challenge to the TOC Guidelines, that subdivision (c)(1)(B) is applicable, and the statute of limitations period began to run when TOC Guidelines were adopted on May 25, 2017. (AR 6939.)

As discussed, the First Cause of Action is both a facial challenge and an as-applied challenge to the TOC Guidelines. It claims the TOC Guidelines exceed the scope of Measure JJJ, and also claims the application of the TOC Guidelines to the Project resulted in "conditions of approval" unauthorized by Measure JJJ. While the facial challenge is barred by subdivision (c)(1)(B), the as-applied challenge is timely under subdivision (c)(1)(E).

The "Additional Incentives" awarded to the Project are contained in the "Director's Determination" as "Conditions for Approval." These became final on April 13, 2021, when the Department of City Planning issued a Letter of Determination denying the appeals filed against the Director's approval of the award of "Additional Incentives." (AR 289.) Petitioner was required to file the Petition within 90 days, or July 12, 2021. (Ibid.; Gov. Code, § 65009, subd. (c)(1)(E).) Petitioner filed the original Petition on July 12, 2021.

The Court recognizes that Petitioner's as-applied challenge includes arguments that also would apply to a facial challenge: the Court must determine whether the "Additional Incentives" and "Tier" system are permitted by Measure JJJ. The Court may do so in considering the as-applied challenge. (Travis, supra, 33 Cal.4th at pp. 768-769 ["That the Ordinance could have been facially attacked in an appropriate action at an earlier time, before it was applied to Travis' property, does not make section 65009 subdivision (c)(1)(E) inapplicable to Travis's claim for

removal of invalid conditions. This is not a case in which the plaintiff complains of injury solely from a law's enactment. [Citation.] Travis complains of injury arising from, and seeks relief from, not simply the Ordinance's enactment or continued presence in the County Code, but the County's imposition on his second unit permit of conditions required by the Ordinance. Having brought his action in a timely way after application of the Ordinance to him, Travis may raise in that action a facial attack on the Ordinance's validity."].)

2. TOC Guideline's Creation of "Tiers" is Not Beyond Measure JJJ

Petitioner focuses on Section 6 of Measure JJJ, which discusses one of the incentives available to affordable housing developments under the TOC Affordable Housing Incentive Program. (AR 6673.) It states, in part,

Residential Density Increase. An Eligible Housing Development shall be granted increased residential density at rates that shall meet or exceed a 35% increase. In establishing density allowances, the Department of City Planning may allow adjustments to minimum square feet per dwelling unit, floor area ratio, or both, and may allow different levels of density increase depending on the Project's base zone and density.

(AR 6673-6674 [emphasis added].) Petitioner contends Measure JJJ prohibits varying levels of incentives on any basis other than "the Project's base zone and density." (Ibid.) According to Petitioner, "Base Incentives" and "Additional Incentives" based on the Project's proximity to transit—the "Tier" system—is beyond the authority granted by Measure JJJ.

There are several weaknesses in this argument. First, the italicized language relied on by Petitioner is applicable only to one form of incentive (Residential Density Increase); it is not an overarching limitation to all incentives, as Petitioner suggests. Second, Measure JJJ does not expressly prohibit differing incentives based on a criterion other than a Project's base zone and density. Third, Measure JJJ intended to provide flexibility to the Director of the Department of City Planning in drafting the TOC Guidelines. It expressly give the Director discretion to draft the TOC Guidelines and establish "eligibility standards, incentives, and other necessary components of this TOC Incentive Program . . . ." (AR 6673 [emphasis added].) Measure JJJ also states that the Director "shall" draft the TOC Guidelines "consistent with [those] purpose[s]". (AR 6673.) A stated purpose of the TOC Affordable Housing Incentive Program is to encourage the development of affordable housing in transit-rich neighborhoods. (AR 6656-6657.) The Tiers in the TOC Guidelines and the award of more favorable incentives to

developments in closest proximity to major transit stops furthers the purpose of Measure JJJ.

The TOC Guidelines' "Tier" system is not inconsistent with or beyond the scope of Measure JJJ.

3. TOC Guideline's "Additional Incentives" Are Not Beyond Measure JJJ

Petitioner focuses next on the "Additional Incentives" authorized by the TOC Guidelines. Those include reductions in otherwise required yards/setbacks, decreases in required open space, increases in maximum lot coverage, decreases in lot width, and increases in development height. (AR 6954-6957.) Petitioner argues that Measure JJJ did not contemplate the "Additional Incentives."

Measure JJJ expressly contemplates the "Base Incentives" included in the TOC Guidelines. (AR 6673-6674.) But Measure JJJ does not prohibit the Director from including additional incentives. Indeed, Measure JJJ allows the Director to draft incentives; those are not limited to the Base Incentives. (AR 6673.) Measure JJJ expressly provides: "[w]ithin 90 days of enactment of this Ordinance, the Director of Planning shall prepare TOC Affordable Housing Incentive Program Guidelines ('TOC Guidelines') that provide the . . . incentives . . . of this TOC Incentive Program . . . ." (Ibid.)

The "Additional Incentives" in the TOC Guidelines are not inconsistent with Measure JJJ.

4. TOC Guidelines and "Q" Qualified Conditions

The Project Site is in the Wilshire Community Plan Area and is zoned [Q]R3-1-O. (AR 18.) The "Q" Qualified Condition, established by Ordinance Number 168.193, limits building height to 35 feet, requires articulation at every 30 feet for building facades exceeding 40 feet, and prohibits balconies above the first floor which have a line of sight to adjacent existing single-family uses. (Ibid.) Petitioner contends the TOC Guidelines improperly violate the "Q" Qualified Condition by awarding incentives in excess of permissible height and articulation. (OB, at p. 17:1-7.)

The Court is unpersuaded this argument provides grounds to invalidate the TOC Guidelines. The premise of Petitioner's First Cause of Action is that the TOC Guidelines are invalid because they are inconsistent with Measure JJJ. But this argument does not concern inconsistency with Measure JJJ; instead it claims a purported inconsistency with the "Q" Qualified Condition. (OB, at p. 17:1-7.) Petitioner's argument concerning the "Q" Qualified Condition does not show that

"the TOC Guidelines [are] inconsistent with Measure JJJ," as alleged in the First Cause of Action. (FAP, ¶ 38.)

The Petition as to the First Cause of Action is DENIED.

B. Second Cause of Action— Petitioner's Challenge to Respondent's Tier 3 Finding under TOC Guidelines

Petitioner's Second Cause of Action contends that approval of "Tier 3" TOC Incentives is not supported by substantial evidence. (OB, at p. 14:6-15:11.)

As discussed, a proposed development will be placed in "Tier 3" if it is within 1,500 feet of a "Major Transit Stop" which includes the intersection of two "Rapid Buses." (AR 2089.) The TOC Guidelines define a "Rapid Bus" as "a higher quality bus service that may include several key attributes, including dedicated bus lanes, branded vehicles and stations, high frequency, limited stops at major intersections, intelligent transportation systems, and possible off-board fare collection and/or all door boarding. It includes, but is not limited to, Metro Bus Rapid Transit lines, Metro Rapid 700 lines, Metro Orange and Silver Lines, Big Blue Bus Rapid lines and the Rapid 6 Culver City bus." (Ibid.)

On April 8, 2021, the City Planning Commission denied the various appeals filed by residents challenging the Director of City Planning's determination that the Project qualifies as "Tier 3." (AR 14-15.) The Commission concluded the Project is located less than 1,500 feet from the intersection of Pico Boulevard and Fairfax Avenue, where two Rapid Bus lines intersect. (AR 22.) The two Rapid Bus lines are Santa Monica Big Blue Bus Rapid 7 and Metro Rapid 780. (AR 22, 286.)

Petitioner does not appear to dispute that Santa Monica Big Blue Bus Rapid 7 and Metro Rapid 780 meet the definition of "Rapid Bus[es]." And Petitioner does not appear to dispute that the Project is located within 1,500 feet from the intersection of Pico Boulevard and Fairfax Avenue, where Santa Monica Big Blue Bus Rapid 7 and Metro Rapid 780 intersect. Rather, Petitioner questions whether Respondent's finding that where the Santa Monica Big Blue Bus Rapid 7 and Metro Rapid 780 meet, at the intersection of Pico Boulevard and Fairfax Avenue, qualifies as a "Major Transit Stop." (OB, at pp. 15:11-16:2.) Petitioner points out that the intersection of two or more bus lines will be considered a "Major Transit Stop" only where those bus lines have "a service interval of 15 minutes or less during the morning and afternoon peak commute hours."

(AR 6947.) Petitioner contends the service interval of Metro Rapid 780 exceeds 15 minutes during the morning and afternoon peak hours, the intersection of the two Rapid bus lines therefore do not meet the definition of "Major Transit Stop," and the Project did not qualify for "Tier 3." (OB, at pp. 15:11-16:2.)

The Court agrees. Respondent's finding is not supported by substantial evidence in the administrative record. Indeed, substantial evidence in the administrative record shows the service interval of Metro Rapid 780 exceeds 15 minutes during the morning and afternoon peak commute hours.

The administrative record includes the bus schedule for Metro Rapid 780 effective as of March 17, 2020. (AR 22 ["[T]he definition of a Major Transit Stop was subsequently clarified through City Planning on August 19, 2020 to apply only to transit schedules in place as of March 17, 2020 . . . ."]; OB, at p. 15:15-21.) Appendix A of the TOC Guidelines outlines the methodology for determining whether a particular bus line has a service interval frequency of 15 minutes or less. (Ibid.) To determine whether a bus line has an average service interval frequency of 15 minutes or less, one must first determine the number of trips the bus line completes during "peak" morning hours and "peak" afternoon hours, and then divide the number of trips made during "peak" morning and afternoon hours by 420. (AR 6958-6959.) 420 represents the total number of minutes during the peak hours of 6:00 AM to 9:00 AM (morning "peak" hours) and 3:00 PM to 7:00 PM (afternoon "peak" hours). (AR 619 [footnote 2], 6958-6959.) Appendix A specifies that the calculation must be completed separately for each direction the bus line travels. "If one or both directions fail to meet the 15 minutes frequency limit, the entire bus line is ineligible for a Major Transit Stop." (Ibid.)

Metro Rapid 780 travels eastbound and westbound. (AR 1982.) The Court finds it makes approximately 12 eastbound trips during the morning "peak" hours, and approximately 12 eastbound trips during the afternoon "peak" hours. (AR 1982, 6958-6959.) Dividing the total number of eligible "peak" hour trips (24 total trips) by 420 yields an average service interval for Metro Rapid 780 Eastbound of approximately 17.5 minutes, which is above the 15-minute requirement for a "Major Transit Stop". (AR 6947.)

Metro Rapid 780 westbound yields similar results. It makes approximately 11 trips during the morning "peak" hours, and approximately 12 trips during the afternoon "peak" hours. (AR 1982, 6958-6959.) The Court divides the total of 23 "peak" hour trips by 420, yielding in an average service interval for Metro Rapid 780 Westbound of approximately 17.5 minutes.

These calculations are greater than the 15-minute requirement for a "Major Transit Stop." (AR 6947.) The Metro Rapid 780 Bus Line is ineligible for inclusion in a Major Transit Stop and does not support Respondent's "Tier 3" finding. (AR 6959.)

Respondent's Opposition does not address this argument, nor does it refer to any portion of the administrative record which provides a calculation different than the Court's, or those provided during the residents' appeals.

Real Party in Interest's remaining arguments are unpersuasive.

Real Party in Interest argues the "Tier 3" category does not contain a 15-minute service requirement. But an overarching eligibility requirement for the TOC Affordable Housing Incentive Program is proximity to a "Major Transit Stop," which is defined as the intersection of two or more bus lines "with a service interval of 15 minutes or less during the morning and afternoon peak commute periods." (AR 6947.) While the definition of "Tier 3" does not itself mention the 15-minute service interval requirement, this requirement is located under the heading "Type of Major Transit Stop." It follows that the "Two Rapid Buses" which intersect must qualify for inclusion within a "Major Transit Stop," and must satisfy the 15-minute service interval requirement. (Ibid.)

Real Party in Interest also argues that the 15-minute service requirement is met if the Court "combines" the intervals of service provided by Metro Rapid 780 and Metro Local Line 217. (Real Party in Interest's Opposition Brief ("RPI Opp."), at pp. 8:12-9:3.) Real Party contends that Metro Rapid 780 and Metro Local Line 217 "follow the same [bus] route from the intersection of Venice and Fairfax to the intersection of Hollywood and New Hampshire." (Id., at p. 8:19-21.) According to Real Party, if the Court were to combine the number of trips made by both bus line during "peak" morning and afternoon commute hours, and divide by 420, the average service interval would be less than 15 minutes. (Id., at p. 8:19-23.)

There are two problems with this argument. First, Real Party in Interest provides no clear authority for the proposition that bus lines may be so combined. Los Angeles Municipal Code section 12.22 A.31 and the TOC Guidelines are silent on whether bus lines may be combined to meet the 15-minute service interval requirement. (AR 6945-6957.) The sample calculation in Appendix A of the TOC Guidelines considers only whether a single bus line meets the 15-minute service interval requirement. While neither expressly prohibits Respondent from combining

multiple bus lines, neither allows it. Real Party in Interest has not shown that Los Angeles Municipal Code section 12.22 A.31 or the TOC Guidelines allow combining bus lines to satisfy the 15-minute service interval requirement.

Second, even if the Municipal Code or the TOC Guidelines could be read to permit combining bus lines, the administrative record does not show that Respondent combined these bus lines in making its determination. Respondent's finding that the intersection of Pico Boulevard and Fairfax Avenue qualifies as a "Major Transit Stop" is vague, without analysis. (AR 22.) Neither the Director's Determination (AR 2959, 2962) nor the Appeal Recommendation Report (AR 20, 22) discusses how the intersection of Pico Boulevard and Fairfax Avenue satisfies the 15-minute service interval requirement. They merely state the conclusion that the intersection qualifies. Neither appears to contemplate combining bus lines to make this determination. (Ibid.) The Transit-Oriented Affordable Housing Referral Form (AR 619) is similarly vague, merely naming bus lines and concluding the 15-minute service interval requirement has been satisfied. (AR 619.)

The Court's inquiry "will be limited to a determination of whether or not the findings are supported by substantial evidence in light of the whole record." (Strumsky v. San Diego County Employees Retirement Assn. (1974) 11 Cal.3d 28, 32.) Respondent must "set forth findings to bridge the analytical gap between the raw evidence and ultimate decision or order." (Sky Posters, Inc. v. Department of Transportation (2022) 78 Cal.App.5th 644, 667-668 ["Reference, in section 1094.5, to the reviewing court's duty to compare the evidence and ultimate decision to 'the findings' . . . leaves no room for the conclusion that the Legislature would have been content to have a reviewing court speculate as to the administrative agency's basis for decision."].)

The administrative record contains no finding that the intersection of Pico Boulevard and Fairfax Avenue constitutes a Major Transit Stop because Respondent combined bus lines to satisfy the 15-minute service interval requirement. The Court will not infer that Respondent made such a finding or speculate on whether it might have done so. [1]

[1] On the eve of trial, Respondent filed a Request for Judicial Notice of a Department of City Planning Director's Determination approving TOC Incentives for an unrelated project. Respondent contends this shows that bus lines are routinely combined to satisfy the 15-minute service interval requirement for a "Major Transit Stop." This document does not show that the Municipal Code or the TOC Guidelines permit combining bus lines, or that such a calculation was made for the project before the Court.

Respondent's finding the Project qualifies for "Tier 3" categorization and incentives, based on the conclusion that the Project is within 1,500 feet of a "Major Transit Stop" including the intersection of "Two Rapid Buses," is not supported by substantial evidence. A writ of mandate setting aside the "Tier 3" incentives awarded under the TOC Affordable Housing Incentive Program is warranted. The Petition as to the Second Cause of Action is GRANTED.

C. Third Cause of Action—Petitioner's Challenge to Respondent's "Class 32" Categorical Exemption Finding

The Third Cause of Action challenges Respondent's finding that environmental review pursuant to CEQA is not required because the Project qualifies for a "Class 32" Categorical Exemption. (FAP, ¶¶ 61-69.) First, Petitioner argues the Project does not satisfy the first and fourth conditions of CEQA Guidelines section 15332. (CEQA Guidelines, § 15332; OB, at pp. 17-24.) Second, Petitioner contends the "unusual circumstances" and/or "cumulative effects" exceptions apply and prohibit the Categorical Exemption. (Id., at p.24-25.)

1. The Record Contains Substantial Evidence That the Project Satisfies the Conditions for a "Class 32" Categorical Exemption

CEQA Guidelines section 15332 lists five conditions that must be satisfied to qualify for a "Class 32" Categorical Exemption. (Ibid.) It states:

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

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

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

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

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

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

Petitioner focuses on subdivisions (a) and (d). Petitioner argues the Project fails to satisfy (a) because substantial evidence demonstrates the Project is inconsistent with the general plan and zoning designations applicable to the Project Site. Petitioner argues the Project fails to satisfy (d) because substantial evidence demonstrates the Project would have a significant effect on noise and air quality.

a. Subdivision (a)—Substantial Evidence Supports the Finding that the Project is Consistent with Applicable General Plan and Zoning Designations

Petitioner argues the Project fails to comply with the applicable "Q" Qualified Conditions. As discussed, the Project Site is within the Wilshire Community Plan Area; it is zoned [Q]R3-1-O, with a corresponding land use designation of "Medium Residential." (AR 18.) The "Q" Qualified Conditions impose various land use requirements, including these:

Section 2. Pursuant to Section 12.32-K of the Los Angeles Municipal Code and the amendments thereto, the following limitations are hereby imposed upon the use of that property shown in Section 1 hereof which are subject to the Permanent "Q" Qualified Classification.

1. 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 owners, heirs or assigns. Further, the agreement must be submitted to the Planning Department for approval before being recorded. After recordation, a copy bearing the Recorder's number and date must be given to the City Planning Department for attachment to the subject file.

. . .

3. Building Mass: For any building façade greater than forty (40) feet in length, articulation shall be required for every thirty (30) feet. Minimum depth of modulation of the façade shall be five (5) feet.

. . .

5. Energy Conservation: Prior to the construction of any project, the Department of Water and Power and the Southern California Gas Company shall be consulted regarding feasible energy conservation features which can be incorporated into the design of the project.

. . .

10. Open Space: A minimum of 100 square feet of usable open space shall be provided for each dwelling unit. Parking area, driveways, front yard setback areas and rooftops shall not be included as open space. To be considered as usable open space[,] the project shall meet the following criteria:

a. Private Open Space: Patios and yards (located at ground level or the first habitable room level) which are part of a single dwelling unit and are enclosed by solid screen material at least four feet in height may eb included as usable open space provided said areas have a horizontal dimension of at least 15 feet in width.

b. Common Usable Open Space: Each common usable open space area . . . shall have an average width of 20 feet with no width less than 15 feet at any point.

. . .

Common open space areas shall incorporate recreational amenities such as swimming pools, spas, picnic tables, benches, tot lots, ball courts, barbecue areas, sitting areas, etc. to the satisfaction of the Department of City Planning.

A minimum of 50 percent of the common usable open space areas shall be planted in ground cover, shrubs or trees[.]

(AR 2289-2291.)

Petitioner argues the Project is inconsistent with these conditions because: (a) The Conditions of Approval failed to require Real Party in Interest to record the contemplated covenant before any permits may be issued; (b) The Project failed to provide articulation at every 30 feet of the building height; (c) The Conditions of Approval do not require Real Party in Interest to consult with the Department of Water and Power and the Southern California Gas Company prior to the construction of the Project to determine energy conservation designs; and (d) The Project fails to

provide the requisite open space per dwelling unit.

Respondent argues that the Project is not required to comply with all the "Q" Qualified Conditions. According to Respondent, the requirements of the "Q" Qualified Conditions may be amended by the "Base Incentives" and "Additional Incentives" under the TOC Affordable Housing Incentive Program. (Ibid.) Respondent's reading of the "Q" Qualified Conditions and the TOC Affordable Housing Incentive Program is supported by the Los Angeles Municipal Code.

On August 18, 1992, Ordinance Number 168193 codified the "Q" Qualified Conditions. (AR 2294.) It amended Los Angeles Municipal Code section 12.04 (entitled "Zones-Districts-Symbols") by effectively re-zoning the Project Site and neighboring properties, placing a "Q" designation in the zoning classification (i.e., "[Q] R3-1-O"). (AR 2288.) Those properties zoned with the "Q" designation would be subject to the land-use requirements and limitations in the "Q" Qualified Conditions. (AR 2287-2288.)

Los Angeles Municipal Code section 12.22 enumerates approximately 35 "[e]xceptions" to the land use restrictions and requirements in Los Angeles Municipal Code sections 12.04 through 12.21.6. (L.A. Municipal Code, § 12.22 [entitled, "Exceptions."].) Where an "[e]xception" is applicable, a property may be used in a way different than the zone permits. (L.A. Municipal Code, § 12.22.) It is undisputed that the TOC Affordable Housing Incentive Program is included in Los Angeles Municipal Code section 12.22 A.31, as one of the 34 specified "[e]xceptions" to the zoning land-use restrictions in Los Angeles Municipal Code sections 12.04 through 12.21.6. (L.A. Municipal Code, § 12.22, subd. A.31.) While the "Q" Qualified Conditions are applicable to the Project Site as a zoning designation, the Project may stray from their requirements by virtue of the Project's eligibility for the TOC Affordable Housing Incentive Program. (Ibid; Bay Area Citizens v. Association of Bay Area Governments (2016) 248 Cal.App.4th 966, 999 [" ' "If the statutory language is clear, our task is at an end, for there is no need for judicial construction." ' "].)

The Court now turns to the "Q" Qualified Conditions, and finds the project is not inconsistent with those conditions.

i. Section 2, Subsection 1 of "Q" Qualified Condition -- "Covenant"

Section 2, subsection 1 of the "Q" Qualified Conditions states: "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 owners, heirs or assigns." (AR 2289.) Petitioner contends the Project fails to comply with this section because Respondent failed to include, as a condition of approval for the Project, a requirement that Real Party in Interest record the covenant. (OB, at pp. 21:23-22:3.)

The Court is not persuaded the Project is inconsistent with this section. Petitioner has failed to demonstrate that the covenant was not recorded by Real Party in Interest's various predecessors. The "Q" Qualified Conditions were created more than 30 years ago. (AR 2294.) This section does not require all owners of the Project Site to record the contemplated covenant. (AR 2289.) It merely requires the owner of the Project Site who requests a permit first following the effective date of the Ordinance to record the contemplated covenant, which will then "run with the land." (AR 2289.) Petitioner fails to show a prior owner of the Project Site had not recorded the covenant.

ii. Section 2, Subsection 3 of "Q" Qualified Conditions --"Building Mass"

Section 2, subsection 3 of the "Q" Qualified Conditions provides: "For any building greater than forty (40) feet in length, articulation shall be required for every thirty (30) feet. Minimum depth of modulation of the façade shall be five (5) feet." (AR 2289.) Petitioner contends the Project fails to provide sufficient articulation in relation to the building's length. (OB, at pp. 17:28-18:2.) Specifically, Petitioner argues that, while the southern elevation of the Project is approximately 132 feet in length (which would require approximately four articulations pursuant to the "Q" Qualified Conditions), the Project provides only "one articulation 20 feet, 8 inches from the western façade." (Ibid.)

Substantial evidence in the administrative record supports Respondent's conclusion the Project is consistent with this section. The plans depict approximately five corridors on the southern façade, which are exposed and visible from the exterior with a glass railing. (AR 187, 195.) The Department of City Planning determined the five exposed corridors provide sufficient articulation for the building's length. (AR 24.) Petitioner argues that the exposed corridors do not constitute sufficient "modulation of the façade because "the [term] "façade" is defined as the boundary of an exterior walls of the structure, which are not changed by exposed corridors." (OB, at p. 18:5-7.)

Petitioner's definition of the term "façade" comes not from the definitions provided within the "Q" Qualified Conditions but from "LawInsider.com." (Petitioner's Request for Judicial Notice, Ex. 1.) The Court is not persuaded that this definition governs. And the Court must give "great weight" to the Department of City Planning's determination that the exterior corridors provide a sufficient modulation of the building's "façade." (Berkley Hills Watershed Coalition v. City of Berkley (2019) 31 Cal.App.5th 880, 896 ["a city's interpretation of its own ordinance, '"is entitled to great weight unless it is clearly erroneous or unauthorized."']).

iii. Section 2, Subsection 5 of "Q" Qualified Conditions --"Energy Conservation"

Section 2, subsection 5 of the "Q" Qualified Conditions provides: "Prior to the construction of any project, the Department of Water and Power and the Southern California Gas Company shall be consulted regarding feasible energy conservation features which can be incorporated into the design of the project." (AR 2289.) Petitioner contends there is no evidence demonstrating Real Party in Interest consulted with either the Department of Water and Power or the Southern California Gas Company regarding feasible energy conservation features for the Project. (OB, at p. 22:6-11.)

The Project is not inconsistent with this section. Under Section 2, subsection 5 consultation with the Department of Water and Power and the Southern California Gas Company is required "prior to the construction of any project." (AR 2289.) It does not require consultation before obtaining approval for the Project, only before construction. Real Party was not required to consult with either the Department of Water and Power or the Southern California Gas Company for the purpose of obtaining approval for the Project.

iv. Section 2, Subsection 10 of "Q" Qualified Conditions -- "Open Space"

Petitioner maintains the Project is incompatible with various "Open Space" requirements in Section 2, subsection 10 of the "Q" Qualified Conditions.

Petitioner first focuses on the mandate that all patios and yards which are "private open space" must "have a horizontal dimension of at least 15 feet in width." (AR 2290.) Petitioner argues that, while the Plans say the Project provides 50 square feet of "private open space" of patios and yards, the patios are not 15 feet in width. (OB, at p. 19:7-10.) Petitioner cites to the Project Plans, on pages 184 through 186 of the administrative record. (Ibid.; AR 184-186.) But the Plans referenced do not display the measurements of the relevant patios on the first floor, and the

legend provides no further guidance. (Ibid.) Petitioner has not proved this contention. [2]

Petitioner next focuses on the requirement that "[c]ommon open space areas shall incorporate recreational amenities such as swimming pools, spas, picnic tables, benches, tot lots, ball courts, barbecue areas, sitting areas, etc. to the satisfaction of the Department of City Planning." (AR 2291.) Petitioner contends "no amenities are provided for the 950 square feet of rear yard space shown on the Plans." (OB, at p. 19:11-12.) But the 950 square feet of rear yard space clearly provides picnic tables and benches. (AR 182.) These are "recreational amenities" pursuant to the "Q" Qualified Conditions (i.e., "[c]ommon open space areas shall incorporate recreational amenities such as . . . picnic tables, benches . . . .") (AR 2291.)

Petitioner then points to the mandate that "[e]ach common usable open space area shall have a total area of at least 400 square feet and shall have an average width of 20 feet with no width less than 15 feet at any point." (AR 2291.) Petitioner contends the "rear yard area has an average width less than 20 feet with widths as narrow as 4 feet[.]" But the Project Plans unambiguously state the rear yard of the Project is approximately 20 square feet in width. (AR 182.)

Next, Petitioner directs us to the requirement that "rooftops shall not be included as open space." (AR 2290.) Petitioner says the "fifth floor garden," which is approximately 592 square feet, may not be counted towards the "open space requirement" because it is "located on the roof of the fourth story." (OB, at p. 19:17-18.) The Court is unpersuaded that the fifth-floor garden may not be counted towards the minimum open space requirements. Notably, following review of the Project's Plans, the fifth-floor garden is not on the rooftop of the Project, as Petitioner would suggest, but is on an exposed deck on the fifth floor. (AR 6540.) The rooftop is above the fifth floor. (AR 6541.)

[2] Even if Petitioner demonstrated the patios are less than 15 feet in width, this would be insufficient to demonstrate the Project has failed to provide the requisite amount of open space. Due to an "Additional Incentive" provided to the Project (25 percent reduction in the amount of open space), the Project is required to provide approximately 1,500 in open space. (AR 15.) The Plans show the Project provides approximately 2,492 square feet in open space. (AR 181.)

Petitioner also points to the requirement that "[a] minimum of 50 percent of the common usable open space areas shall be planted in ground cover, shrubs or trees . . . ." (AR 2291.) Petitioner contends "the Project fails to landscape 50 percent of common open space as virtually none of the open space that meets the [Q] Conditions provides landscaping." (OB, at pp. 19:23-20:1 [emphasis added].) The Court already has concluded the open space provided by the Project complies with the "Q" Qualified Conditions.

Petitioner's contention that the Project fails to qualify for a "Class 32" Categorical Exemption because it is inconsistent with the "Q" Qualified Conditions is unpersuasive. Substantial evidence demonstrates the Project is sufficiently "consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations."

b. Subdivision (d)—Substantial Evidence Supports the Finding the Project Would Not Result in Significant Effects to Air Quality or Noise

CEQA Guidelines section 15332(d) requires that "[a]pproval of the project not result in any significant effects relating to traffic, noise, air quality, or water quality." Petitioner argues that Respondent's determination the Project will not have a substantial effect on noise and air quality is not supported by substantial evidence.

i. Air Quality Impacts and Greenhouse Gas Emissions

Petitioner's argument concerning air quality centers on the Greenhouse Gas ("GHG") emissions resulting from the Project. (OB, at p. 22:12-24.) Respondent concluded the Project would not have a significant effect upon air quality. (AR 23.) Respondent based its conclusion on "a March 2020 . . . Air Quality Technical Report prepared by ZMassociates Environmental Corporation International." (Ibid.) The ZM Report assessed the Project's effect on air quality by employing the South Coast Air Quality Management District ("SCAQMD") Final Localized Significance Threshold Methodology, published in July 2008. (AR 6621.) Noting that the "Regional Construction Threshold" for Localized Significance with respect to GHG emissions is 3,000 CO2e/year, the ZM Report concluded the GHG emissions created by the Project would be only 70.69 CO2e/year. (AR 6624.) Petitioner contends this finding is erroneous because the SCAQMD "threshold for significance" employed by the ZM Report is outdated, and a more recent "threshold for significance" should have been used. (OB, at p. 22:14-24.) Relying on a report prepared by the consulting entity SWAPE, Petitioner argues the suggested "SCAQMD

2035 efficiency target of 3.0 MT CO2e/SP/year" should have been employed to assess the Project's impact upon GHG emissions. (Ibid.)

Respondent makes two arguments in response. First, Respondent contends the air quality assessment does not require analysis of potential GHG emissions. (Resp. Opp., at pp. 10:24-11:4.) Respondent contends subdivision (d) merely requires it to analyze potential substantial impacts to "air quality." Respondent cites to Appendix G of the CEQA Guidelines, which is a sample "Environmental Checklist Form" that may be used to conduct an initial study of a Project's potential environmental impacts. (CEQA Guidelines, Appendix G.) The sample includes a list of "[e]nvironmental [f]actors" which may be "[p]otentially [a]ffected" by a project's development; it shows "Air Quality" and "Greenhouse Gas Emissions" in separate categories. (Ibid.) Second, if the Court concludes GHG emissions fall within the scope of an analysis of air quality impacts, Respondent contends the standard used in the ZM Report is appropriate.

The Court is not persuaded by Respondent's interpretation of the language of subdivision (d). Although "Air Quality" and "Greenhouse Gas Emissions" are listed separately in Appendix G, this also shows that analysis of GHG emissions is relevant in considering whether the Project will have a significant impact on air quality. Indeed, the ZM Report, on which Respondent relies, analyzes GHG emissions. (AR 6624.) Moreover, Respondent has provided no case law or statue supporting its contention that an analysis of air quality would not include an analysis of GHG emissions.

Respondent's second argument is meritorious. As stated, Petitioner contends Respondent employed an outdated "threshold of significance." (OB, at p.22:14-24.) But CEQA Guidelines section 15064.4 expressly states that an agency has "discretion to select the model or methodology it considers most appropriate to enable decision makers to intelligibly take into account the project's incremental contribution to climate change." (CEQA Guidelines, § 15064.4, subd. (c).) This discretion reflects "the existing CEQA principle that there is no iron-clad definition of 'significance.'[Citation.]." (Center for Biological Diversity v. Department of Fish & Wildlife (2015) 62 Cal.4th 204, 221.) At oral argument, Petitioner conceded that Respondent has discretion to determine the most appropriate model or methodology to assess the Project's impact on GHG emissions.

The Court is not persuaded that Respondent's use of the threshold of significance in SCAQMD's Final Localized Significance Threshold Methodology (2008) was an abuse of discretion.

Petitioner has not shown that the threshold of significance employed by Respondent was superseded by the threshold of significance set forth by the SCAQMD. As noted, Petitioner relies on a recommendation by the consulting entity SWAPE, which opines that Respondent should have used the SCAQMD 2035 efficiency target of 3.0 metric tons of carbon dioxide equivalents per service population per year. (AR 3158-3159.) SWAPE cites to a publication by a separate non-profit agency named Association of Environmental Professionals. (AR 3158, fn. 22.) But this publication does not establish that SCAQMD adopted this new threshold of significance for GHG emissions, or that they supersede the threshold used by Respondent. (Ibid.) Rather, this publication is a recommended "action plan" based on the opinions of its authors, the Association of Environmental Professionals. (Ibid.) This does not establish that Respondent abused its discretion in applying the threshold of significance in SCAQMD's Final Localized Significance Threshold Methodology (2008) to assess the Project's impact upon GHG emissions.

Respondent did not commit an abuse of discretion by concluding CEQA Guidelines section 15332(d) was satisfied, and the Class 32 Categorical Exemption properly may be applied.

ii. Construction and Operational Noise Impacts

Petitioner's challenge to Respondent's determination concerning noise impacts centers on construction-related noise and operational noise.

Petitioner challenges Respondent's conclusion that construction-related noise will not exceed the maximum decibel limit in Los Angeles Municipal Code section 112.05 of approximately 75 dB(A). The Court is not persuaded by Petitioner's contentions. Substantial evidence in the administrative record, including the expert conclusions in the ZM Report, supports Respondent's conclusion. (AR 6619.) The ZM Report states: "[d]ue to the small project size, the limited number of construction vehicles, limited number of construction equipment, and small size of construction equipment compared to much larger projects, the proposed project will not result in exceedance of City of Los Angeles noise ordinances." (Ibid.)

Petitioner challenges this with an opposing expert report produced by Project opponents during an administrative hearing. (OB, at pp. 23:1-24:1.) This report was prepared by RK Engineering; it concludes the construction-related noise caused by the Project "would result in expected noise levels ranging from 78.5 dB(A) to 117 dB(A)." (AR 3333.) But differing expert opinion is not determinative in a substantial evidence review. (We Advocate Through Environmental Review v. County of Siskiyou (2022) 78 Cal.App.5th 683, 699 [holding, "' "a disagreement among

experts does not make an EIR inadequate"' " and is not determinative in a substantial evidence review].)

Petitioner's arguments concerning operational noise fare no better. Respondent's conclusion is supported by factual findings reached by Department of City Planning staff in a Recommendation Report. (AR 91.) The Department of City Planning concluded: "[n]oise generated through human conversation and activities (particularly in outdoor recreational spaces, such as balconies and patios), landscape maintenance, or trash collection would not exceed the recommended noise compatibility guidelines. Any new stationary sources of noise, such mechanical HVAC equipment, installed on the proposed development will be required to comply with LAMC Sections 112.02 and 112.05 which prohibit noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level at neighboring occupied properties by more than five dBA. In addition, the project is not expected to generate a substantial number of vehicle trips which could in turn generate additional noise. The proposed project is expected to generate a negligible increase in ambient noise from operation." (Ibid.)

Petitioner questions the Department of City Planning's findings, citing to a differing expert report which concludes" "it is highly probable that a noise level exceedance would occur from mechanical equipment operating on the project site." (AR 3333.) Again, differing expert opinions are insufficient and this one also appears speculative. (We Advocate Through Environmental Review, supra, 78 Cal.App.5th at p. 699; CEQA Guidelines, § 15384, subd. (a) [substantial evidence does not include "speculation"].)

2. Petitioner Has Failed to Demonstrate the "Unusual Circumstances" Exception or the "Cumulative Impacts" Exception are Applicable

Petitioner argues that the "unusual circumstances" and/or "cumulative impacts" exception apply. (OB, at pp. 24:16-25:18.) Under the CEQA statutory scheme, the thirty-three categorical exemptions are not absolute. (North Coast Rivers Alliance v. Westlands Water Dist. (2014) 227 Cal.App.4th 832, 850 (North Coast Rivers).) They "are subject to exceptions that defeat the use of the exemption." (Ibid.) Where an exception to an exemption applies, the public agency "must 'conduct an initial study to determine if the project may have a significant effect on the environment.' [Citation.]" (Muzzy Ranch, supra, 41 Cal.4th at p. 381.) It is Petitioner's burden to show such an exception applies. (CREED 21, supra, 234 Cal.App.4th at p. 514.)

a. "Unusual Circumstances" Exception

The "unusual circumstances" exception of CEQA Guidelines section 15300.2, provides: "[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." (State CEQA Guidelines, § 15300.2, subd. (c).)

The California Supreme Court in Berkeley Hillside Preservation v. City of Berkeley (2015) 60 Cal.4th 1086 sets forth a two-part, "bifurcated approach" to determine whether a public agency abused its discretion in concluding an "unusual circumstances" exception was inapplicable. (Id. at pp. 1114-1115.) First, the reviewing court must review the administrative record to determine whether there is substantial evidence supporting Respondent's determination that the Project does not present unusual circumstances. A project presents "unusual circumstances" when it will have a significant effect on the environment. (Berkeley Hillside, supra, 60 Cal.4th at p. 1105.) Second, the court determines whether the evidence presents a "fair argument" of "a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances." (Berkeley Hillside, supra, 60 Cal.4th at p. 1114.) A "fair argument" may be made where the administrative record includes substantial evidence reflecting "'it [could] be "fairly argued"' " that "there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances." (Id. at p. 1112.)

Petitioner focuses on construction-related noise and GHG emissions, arguing that substantial evidence demonstrates these are "unusual circumstances."

The Court concludes substantial evidence in the record fails to demonstrate the Project presents "unusual circumstances." Petitioner has failed to establish the Project encompasses "unusual" features which would cause a significant effect on the environment. The Court already has determined Petitioner's arguments concerning noise and GHG emissions are unavailing. Petitioner has failed to satisfy the first prong of the "bifurcated approach" of Berkeley Hillside. (Berkeley Hillside, supra, 60 Cal.4th at p. 1105.)

In this case, the second prong of the Berkeley Hillside analysis dovetails with the first. Substantial evidence does not present a "fair argument" the Project will have a significant impact on the environment.

The Court concludes Petitioner has failed to satisfy that the "unusual circumstances" exception

applies.

b. "Cumulative Impacts" Exception

The "cumulative impacts" exception, in CEQA Guidelines section 15300.2, subdivision (b), provides: "[a]ll 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." "'Cumulative impacts' refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." (CEQA Guidelines, § 15355.) "The individual effects may be changes resulting from a single project or a number of separate projects." (CEQA Guidelines, § 15355, subd. (a).) "The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impact can result from individually minor but collectively significant projects taking place over a period of time." (CEQA Guidelines, § 15355, subd. (b).) The challenging party has the "burden to produce evidence that there was a fair argument that the cumulative impact exception applied." (Aptos Residents Assn. v. County of Santa Cruz (2018) 20 Cal.App.5th 1039, 1052.)

Petitioner argues that three other developments near the Project have been approved by Respondent and "likely [will] be developed concurrently" with the Project, resulting in a significant cumulative impact to air quality. (OB, at p. 25:4-18.) The development projects are: (a) 1444 Hi Point Street (VTT-74364-SL); (b) 1437 Hi Point Street (DIR-2009-2189-SPR-DB); and (c) 1500 Hi Point Street ((DIR-2020-1870-TOC-HCA). (Ibid.) Petitioner cites to the SWAPE Report, which concludes the additional projects and the development at the Project Site "will occur in close proximity at the same time, thus resulting in a potentially significant cumulative impact." (AR 3152-3153.)

Petitioner has failed to demonstrate a fair argument that the cumulative impacts of successive projects, including the Project at issue here, would have a significant effect on the environment. The contentions in the SWAPE Report appear to be speculative. Petitioner fails to confirm whether the additional development projects will occur at the same time as the development of the Project Site, suggesting only that they "would likely be developed" at the same time. (OB, at p. 25:9-10.) And while the SWAPE Report concludes: "[the] projects at 1447 and 1500-1512 ½ South Hi Point Street will occur in close proximity at the same time[,]" the Report fails to articulate any facts—such as a development schedule for the referenced projects—supporting

this conclusion. (AR 3152.)

The Court finds no prejudicial abuse of discretion in Respondent's determination of a categorical exemption. The Petition as to the Third Cause of Action is DENIED.

VI. CONCLUSION

Petitioner's First Amended Writ of Mandate is GRANTED in part and DENIED in part. It is DENIED with respect to the First and Third Causes of Action. It is GRANTED with respect to the Second Cause of Action.

A writ of mandate is issued ordering Respondent to vacate and set aside approval of the Project, including Respondent's award of "Tier 3" TOC Incentives under the TOC Affordable Housing Incentive Program.

Petitioner shall submit a proposed writ of mandate within 10 days.

Order to Show Cause Re: Submission of Proposed Judgment is scheduled for 03/23/2023 at 08:30 AM in Department 54 at Stanley Mosk Courthouse.

The Ruling is filed this date.

The clerk gives notice as reflected in the certificate of mailing. Plaintiff is to give notice to any additional interested parties not reflected in the certificate of mailing.

Certificate of Mailing is attached.

COMMENT LETTER NO. 2B

P: (626) 314-3821
F: (626) 389-5414
E: info@mitchtsailaw.com

Mitchell M. Tsai
Law Firm

139 South Hudson Avenue
Suite 200
Pasadena, California 91101

VIA E-MAIL

November 29, 2023

Rey Fukuda, City Planning Associate
221 North Figueroa Street, Suite 1350
Los Angeles, California 90012
200 North Spring Street, Room 763
Los Angeles, California 90012
P: (213) 847-3686
E: rey.fukuda@lacity.org

RE: **City of Los Angeles, South Park Towers Project (Case Nos. ENV-2018-3337-SCEA, CPC-2018-3336-SN-TDR-CUB-ZV-SPR-MSC, VTT-82213)**

Dear Mr. Fukuda:

On behalf of the Western States Regional Council of Carpenters ("**Western Carpenters**" or "**WSRCC**"), my Office is submitting these comments regarding the City of Los Angeles' ("**City**") South Park Towers project (Case Nos. ENV-2018-3337-SCEA, CPC-2018-3336-SN-TDR-CUB-ZV-SPR-MSC, VTT-82213) ("**Project**"). 2B.1

WSRCC would like to express its support for this Project and withdraw their prior November 20, 2023 comment letter. After receiving clarification and further information about this Project, WSRCC believes this Project will benefit the environment and will be built utilizing protocols that will protect worker health and safety.

Should the City have any questions or concerns, please feel free to contact my Office.

Sincerely,

Mitchell M. Tsai, Esq.
Attorneys for Western States Regional Council of Carpenters

INITIAL SUBMISSIONS

The following submissions by the public are in compliance with the Commission Rules and Operating Procedures (ROPs), Rule 4.3a. Please note that "compliance" means that the submission complies with deadline, delivery method (hard copy and/or electronic) AND the number of copies. The Commission's ROPs can be accessed at **http://planning.lacity.org**, by selecting "Commissions & Hearings" and selecting the specific Commission.

The following submissions are not integrated or addressed in the Staff Report but have been distributed to the Commission.

Material which does not comply with the submission rules is not distributed to the Commission.

ENABLE BOOKMARKS ONLINE:

**If you are using Explorer, you will need to enable the Acrobat toolbar to see the bookmarks on the left side of the screen.

If you are using Chrome, the bookmarks are on the upper right-side of the screen. If you do not want to use the bookmarks, simply scroll through the file.

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

June 11, 2025

More Song, City Planner
more.song@lacity.org
(213) 978-1319

Dear City Planning Commission,

We are writing to you in support of the proposed 250-unit mixed use development at 1600 South Flower Street (1600-1618 South Flower Street, 1601-1623 South Hope Street, 426-440 West Venice Boulevard), case number CPC-2018-3336-SN-TDRCUB-SPR-MSC. We urge the city to approve the project.

This South Park Towers Project is in a good location for housing, surrounded by bus stops and less than a half mile from Metro E and A line stops. Major employers, including Dignity Health - California Hospital Medical Center, Crypto.com Arena, L.A. Live, Peacock Theater, and the Los Angeles Convention Center, are less than one mile away. This project will replace commercial buildings and add 250 units of housing and 300 hotel rooms to serve the nearby entertainment attractions without the loss of any residential units. This is exactly the sort of dense residential development in a Transit Priority Area that the city should encourage. This project is good for Los Angeles and for the region and we urge the city to approve the project.

Best Regards,

Azeen Khanmalek
AHLA Executive Director

John Yi
Director of Organizing

Tami Kagan-Abrams
AHLA Project Director

CITY TOURISM DEPARTMENT

LOS ANGELES CONVENTION CENTER
1201 S. FIGUEROA STREET
LOS ANGELES, CA 90015

(213) 765-4601

June 9, 2025

Los Angeles City Planning Commission
200 North Spring Street
Los Angeles, CA 90012

SUBJECT: SOUTH PARK TOWERS PROJECT
Project Address: 1600-1618 South Flower Street, 1601-1623 South Hope Street, 426-440 West Venice Boulevard, Los Angeles, CA 90015
Case Numbers: CPC-2018-3336-SN-TDR-CUB-SPR-MSC, VTT-82213, and ENV-2018-3337-SCEA

As Chief Tourism Officer and Executive Director of the Los Angeles City Tourism Department (CTD), I would like to express our support for the Venice Hope Group, LLC.'s proposed hotel, the South Park Towers Project (Project), at 1600 South Flower Street. The project's key location just blocks away from the Los Angeles Convention Center (LACC) would further the City's goals of increasing tourism and convention growth by adding more hotel rooms to meet future demand, which in turn increases economic development of the region and creates long-term benefits for our residents, businesses, and other stakeholders.

The mission of CTD is to enhance and increase Los Angeles' prominence as a world- class tourist and convention destination. CTD promotes policies that drive economic development, create jobs, and improve the experience visitors have when visiting the City's unique cultural, sports, entertainment, and leisure attractions.

This expansion also serves the goals of the City's Tourism Master Plan, which is a destination management plan that analyzes Los Angeles' tourism assets and looks at what infrastructure is required in order to handle the large increase in visitation expected in the upcoming years. Two key recommendations from the Tourism Master Plan are to support the proposed expansion of the LACC and to identify and advocate for new hotel development opportunities.

The Project would deliver 300 new hotel guest rooms, which would improve the City's hotel stock and be consistent with the goals of the Tourism Master Plan. Hotels are essential providers of high-quality jobs and account for a substantial part of the workforce in Los Angeles County. These entry-level, well-paying jobs lead to careers and economic stability.

Also, the Project has the ability to improve the City's tax base and help fund LA's General Fund to pay for City services. CTD welcomes projects willing to invest in the City and facilitate the continued strengthening of the hospitality industry. As the Project also contemplates 250 residential dwelling units and ground floor retail uses, the realization of this development would increase critical mass needed to support local and regional businesses.

For the reasons noted above, and generally to advance the City's major tourism-related initiatives and further build Los Angeles as a world-class destination, CTD enthusiastically supports the South Park Towers Project and looks forward to its approval and eventual opening.

Respectfully submitted,

Doane Liu

Doane Liu
Executive Director

DL:kn
Exec. Ref. 25-012

CITY OF LOS ANGELES
CALIFORNIA

ERIC GARCETTI
MAYOR

CERTIFICATE OF OCCUPANCY

OWNER YADEGAR, FARAMARZ TR
T O Y FAMILY TRUST

0 PO BOX 16152
BEVERLY HILLS CA 90209

No building or structure or portion thereof and no trailer park or portion thereof shall be used or occupied until a Certificate of Occupancy has been issued thereof. Section 91.109.1 LAMC

CERTIFICATE: Pending-Review	DATE:
BY: RICKEY JACKSON	11/24/2015

SITE IDENTIFICATION
ADDRESS: 1721 S FLOWER ST 90015

LEGAL DESCRIPTION

TRACT	BLOCK	LOT(s)	ARB	CO. MAP REF #	PARCEL PIN	APN
WRIGHT TRACT		15		M R 10-32	124-5A205 141	5126-010-008

This certifies that. so far as ascertained or made known to the undersigned, the vacant land, building or portion of building described below and located at the above address(es) complies with the applicable construction requirements (Chapter 9) and/or the applicable zoning requirements (Chapter 1) of the Los Angeles Municipal Code for the use and occupancy group in which it is classified and is subject to any affidavits or building and zoning code modifications whether listed or not.

COMMENT Convert 2nd Fl. of (E) office/warehouse/garage to hostess dance hall per ZA 99-2571 (CUX) 16 required parking spaces for existing uses (under modification per ZA 2003-9927) 8 offsite parking located at 1616 S Flower.

USE	PRIMARY	OTHER	
	Dance Hall - hostess	Night Club	Office

PERMITS
00016-10000-18797 | 15016-10000-24130 |

STRUCTURAL INVENTORY

ITEM DESCRIPTION	CHANGED	TOTAL
Floor Area (ZC)	0 Sqft	
A2 Occ. Group	0 Sqft	
A2 Occ. Load	232 Max Occ.	232 Max Occ.
Parking Req'd for Site (Auto+Bicycle)	16 Stalls	16 Stalls
Provided Offsite for Bldg	8 Stalls	8 Stalls

CITY LA DBS
DEPARTMENT OF BUILDING AND SAFETY

APPROVAL

CERTIFICATE NUMBER:	142167
BRANCH OFFICE:	LA
COUNCIL DISTRICT:	9
BUREAU:	INSPECTN
DIVISION:	BLDGINSP
STATUS:	Intent to Correct CofO
STATUS BY:	RICKEY JACKSON
STATUS DATE:	11/24/2015

Certificate No: *142167

PERMIT DETAIL

PERMIT NUMBER	PERMIT ADDRESS	PERMIT DESCRIPTION	STATUS - DATE - BY
00016-10000-18797	1721 S Flower St	Change of use from office/warehouse/garage to hostess dance hall/ warehouse/garage per ZA 99-2571 (CUX) (Expired after 5 years) Change is on 2nd floor only. No food or drink allowed.	Permit Finaled - 11/10/2015 RICKEY JACKSON
15016-10000-24130	1721 S Flower St	TO ESTABLISH THE REQUIRED PARKING FOR THE EXISTING USES UNDER MODIFICATION PER ZA 2003-9927(PA4), DATED JANUARY 26, 2012.	Issued - 11/10/2015 COMCASH COMCASH

PARCEL INFORMATION

Area Planning Commission: South Los Angeles
Certified Neighborhood Council: Downtown Los Angeles
Community Plan Area: Southeast Los Angeles
Energy Zone: 8
Methane Hazard Site: Methane Zone
Oil Well: None
Thomas Brothers Map Grid: 634-D6

Census Tract: 2240.10
Cmpt. Fill Grd.: CFG 2000
Council District: 9
Fire District: 2
Near Source Zone Distance: 7.96519
Parking Dist.: CCPD
Zone: M2-2-O

Census Tract: 2240.20
Cmpt. Fill Grd.: CFG-2000
District Map: 124-5A205
LADBS Branch Office: LA
Near Source Zone Distance: 0
Thomas Brothers Map Grid: 634

PARCEL DOCUMENT

Affidavit (AFF) AFF 52339
City Planning Cases (CPC) CPC 84-0226 (SP)
City Planning Cases (CPC) CPC-1990-346-CA
City Planning Cases (CPC) CPC-2005-361-CA
Community Development Block Grant (CDBG) LARZ-Central City
Ordinance (ORD) ORD 162128
Ordinance (ORD) ORD-162128
Parking Layout (PKLY) PKG-5267
Zoning Administrator"s Case (ZA) ZA-1999-2571-CUX
Zoning Administrator"s Case (ZA) ZA-2003-9927-CU
Zoning Information File (ZI) ZI 1941
Zoning Information File (ZI) ZI-1941 Council District 9 Redevelopment Project
Zoning Information File (ZI) ZI-2412 Fast Food Establishments

Affidavit (AFF) AFF-52339
City Planning Cases (CPC) CPC-18222
City Planning Cases (CPC) CPC-2005-1122-CA
Community Development Block Grant (CDBG) BID-FIGUEROA CORRIDOR
Community Development Block Grant (CDBG) SEZ-LOS ANGELES STATE ENTERPRISE ZONE
Ordinance (ORD) ORD 171682
Ordinance (ORD) ORD-171681
Specific Plan Area (SPA) South Los Angeles Alcohol Sales
Zoning Administrator"s Case (ZA) ZA-1999-2571-CUX (DANCE HALL)
Zoning Information File (ZI) ZI 1117
Zoning Information File (ZI) ZI 2126
Zoning Information File (ZI) ZI-2374 LOS ANGELES STATE ENTERPRISE ZONE
Zoning Information File (ZI) ZI-2427 FWY Adj Advisory Notice for Sensitive Uses

Affidavit (AFF) PKG 5267
City Planning Cases (CPC) CPC-1983-506-SP
City Planning Cases (CPC) CPC-2005-1124-CA
Community Development Block Grant (CDBG) LARC-Los Angeles
Community Redevelopment Area (CRA) ZI 1941 CD 9 CORRIDORS
Ordinance (ORD) ORD-130253
Ordinance (ORD) ORD-171682
Zoning Administrator"s Case (ZA) ZA 99-0038 (CUZ)
Zoning Administrator"s Case (ZA) ZA-1999-38-CUZ
Zoning Information File (ZI) ZI 1231
Zoning Information File (ZI) ZI-1117 MTA Project
Zoning Information File (ZI) ZI-2385 Greater Downtown Housing Incentive Area

CHECKLIST ITEMS

Attachment - Owner-Builder Declaration
Attachment - Plot Plan
Permit Flag - Not a Fire Life Safety Project

PROPERTY OWNER, TENANT, APPLICANT INFORMATION

OWNER(S)

Yadegar, Faramarz Tr T O Y Family Trust — 0 Po Box 16152 — BEVERLY HILLS CA 90209
Yadegar, Faramarz Tr T O Y Family Trust — 8900 Burton Way — BEVERLY HILLS CA 90211

TENANT

APPLICANT

Relationship Owner-Bldr
-Owner-Builder — (213) 746-2710
Relationship Owner
Faramarz Yadegar- — 1 1

BUILDING RELOCATED FROM:

(C)ONTRACTOR, (A)RCHITECT & (E)NGINEER INFORMATION

NAME	ADDRESS		CLASS	LICENSE #	PHONE #
(A) Dardashti, Bijan Rahim	5371 Wilshire Blvd # 203,	Los Angeles, CA 90036	NA	C13487	
(O) , Owner-Builder	,	,	NA	0	(213) 746-2710
(O) , Owner-Builder	,	,	NA	0	

SITE IDENTIFICATION-ALL

ADDRESS:
1721 S FLOWER ST 90015

LEGAL DESCRIPTION-ALL

TRACT	BLOCK	LOT(s)	ARB	CO.MAP REF #	PARCEL PIN	APN
WRIGHT TRACT		15		M R 10-32	124-5A205 141	5126-010-008

0 5 T G 1 5 0 0 0 1 0

Recorded at the request of
and mail to:
Arnold Schwartz
(Name)
1374 So. Flower
(Address)
Los Angeles, CA 90015

COPY of Document Recorded
84-1182551
A comparison with original

SPACE ABOVE THIS LINE FOR RECORDER'S USE

CONVENANT AND AGREEMENT REGARDING MAINTENANCE OF OFF-STREET PARKING SPACE

The undersigned hereby certify that we are the owners of the hereinafter legally described real property located in the City of Los Angeles, State of California:

Lot 1 of tract No. 22198 In the City of Los Angeles

(Legal description of parking site)

as recorded in Book 791, Page 19 and 20, Records of Los Angeles County.

Parking site address: 1616 So. Flower Street

And pursuant to Section 12.26E5 of the Los Angeles Municipal Code the undersigned hereby convenant and agree to and with said City that an off-site parking area containing not less than 8 (number) usable and accessible automobile parking spaces which comply with Section 12.21A5 of the Los Angeles Municipal Code will be provided and maintained on the above described property to provide the required parking for the use or the building located at 1721 So. Flower Street

in said City upon that land legally described as follows: Lot 15 of Wright Tract

(Legal description of building site)

as recorded in Book 10, Page 32, Records of Los Angeles County. This covenant and agreement shall run with the land and shall be binding upon ourselves, any future owners, encumbrancers, their successors, heirs or assignees and shall continue in effect so long as the use or building requiring such parking is maintained without providing off-street automobile parking spaces on the same lot and/or another lot as required by the provisions of the Los Angeles Municipal Code or unless otherwise released by authority of the Superintendent of Building of the City of Los Angeles. Cal. Potatoes SAMPLE Sec. 6167 LAC

Dated this 1st day of October, 19 84

Signature of Parking Site Owner: Jerry Greenfield (sign)

(I) (WE) the mortgagee or trust deed beneficiary agree to the above stated condition by affixing (my) (our) signature hereto:

Signature of Mortgagee or Trust Deed Beneficiary: _____ (sign)

There is no mortgage or trust deed affecting this property. I declare under penalty of perjury that the foregoing statement is true and correct. Executed at Los Angeles, California on this _____ day of

1st October, 19 84

Signature of Parking Site Owner: Jerry Greenfield (sign)

_____ (sign)

NOTARIZATION FOR INDIVIDUAL

STATE OF CALIFORNIA
COUNTY OF LOS ANGELES } ss.

On this 1st day of October in the year 1984 before me, the undersigned, a Notary Public in and for said County and State, personally appeared

Jerry Greenfield
Donald L. Oken

personally known to me or proved to me on the basis of satisfactory evidence to be the person whose name is subscribed to this instrument and acknowledged that he (she or they) executed it.

WITNESS my hand and official seal.

P Brennan
P. Brennan

OFFICIAL SEAL
P BRENNAN
NOTARY PUBLIC - CALIFORNIA
LOS ANGELES COUNTY
My comm. expires APR 22, 1988

NOTARIZATION FOR CORPORATION

STATE OF CALIFORNIA
COUNTY OF LOS ANGELES } ss.

On this 1st day of October in the year 1984, before me, the undersigned, a Notary Public in and for said County and State, personally appeared

Jerry Greenfield
Donald L. Oken

known to me to be the President or the Secretary, or both, of the Corporation that executed the within Instrument, known to me to be the person who executed the within Instrument on behalf of the Corporation therein named, and acknowledged to me that such Corporation executed the within Instrument pursuant to its by-laws or a resolution of its board of directors.

Vice President and

WITNESS my hand and official seal.

P Brennan
P. Brennan

OFFICIAL SEAL
P BRENNAN
NOTARY PUBLIC - CALIFORNIA
LOS ANGELES COUNTY
My comm. expires APR 22, 1988

MUST BE APPROVED BY
Dept. of Building & Safety
prior to recording

APPROVED BY _____ Parking 5267

FOR DEPARTMENT USE ONLY

Branch Office LA

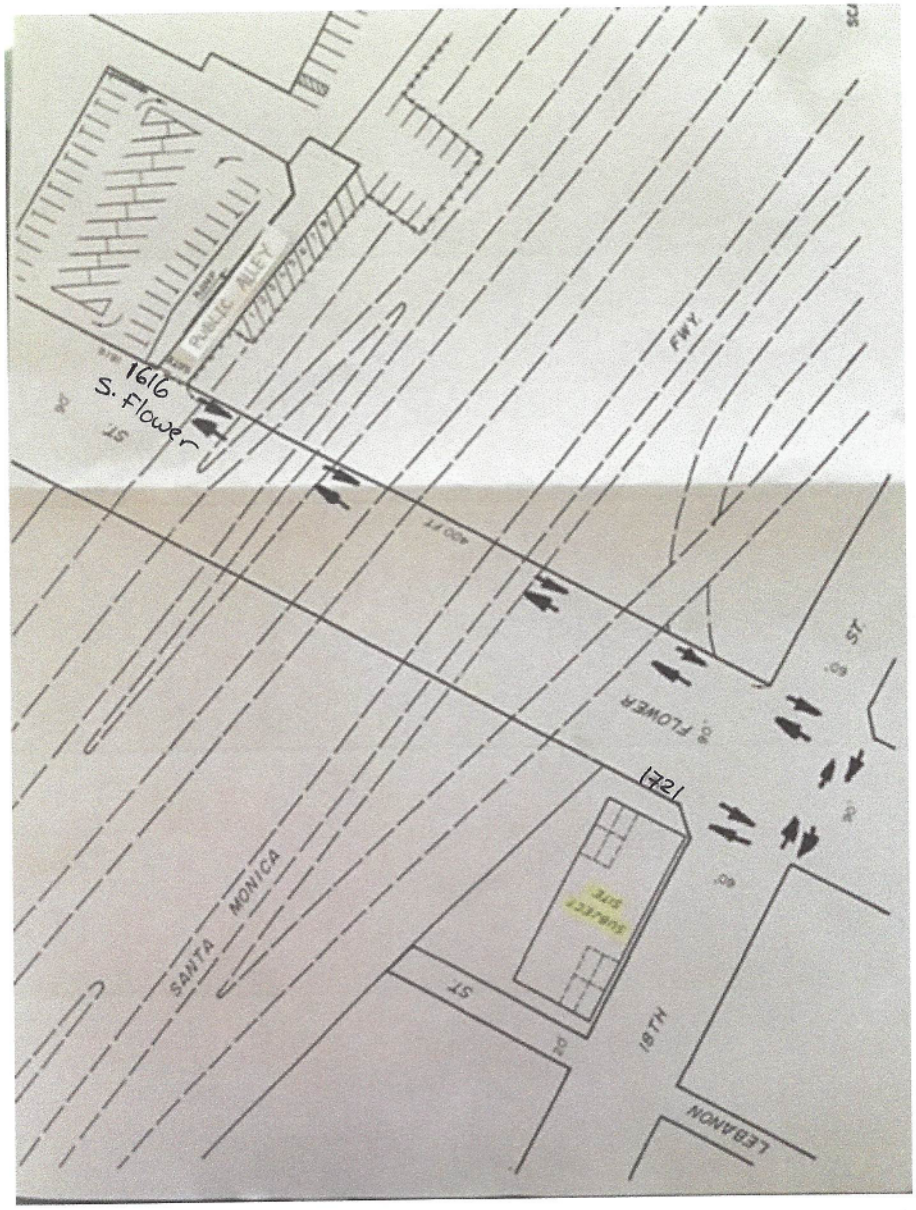
District Map 122205 Parking 5267

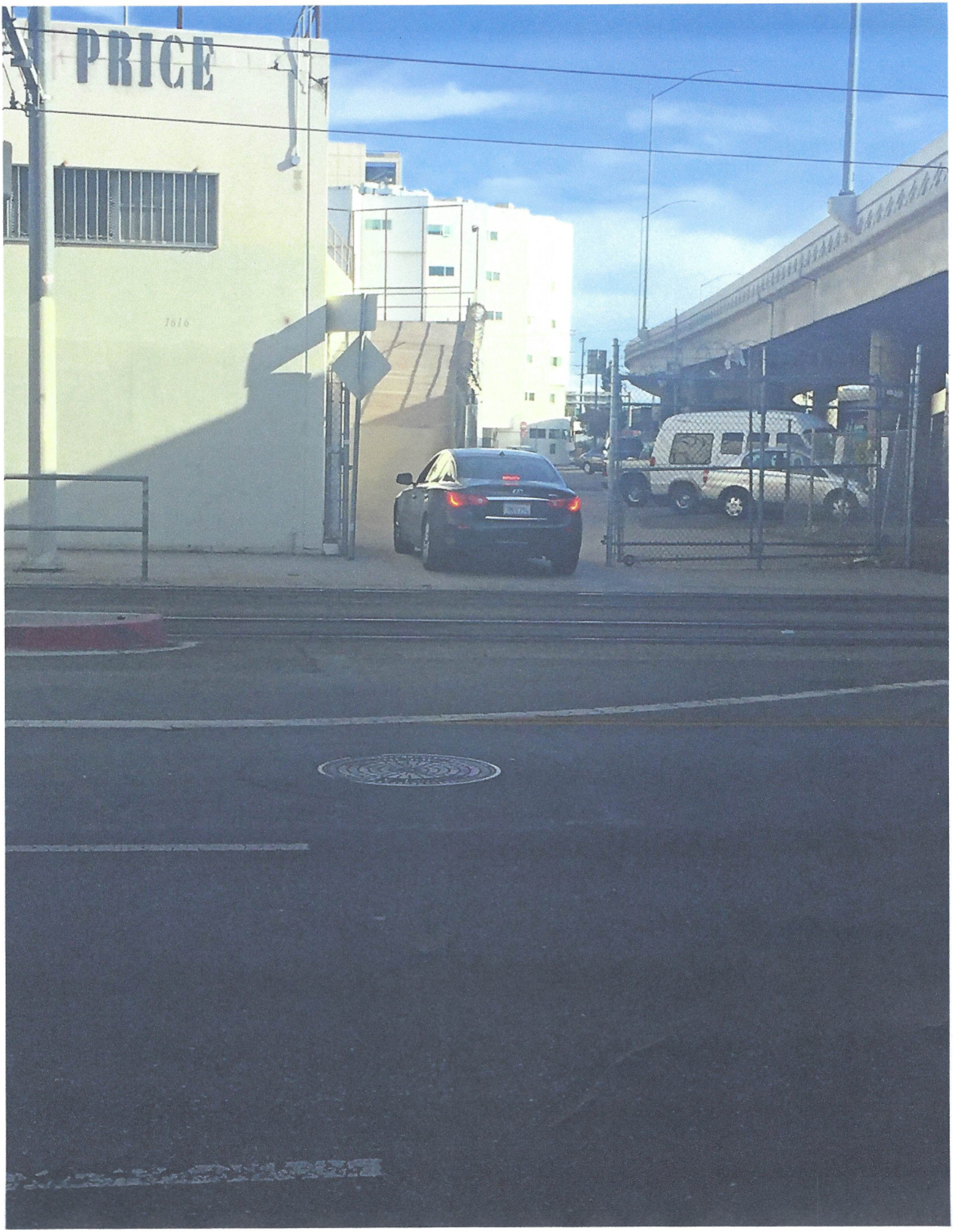
Affidavit

8 additional pkg. spaces for these offices are maintained at 1616 S. Flower St.

Off. Street Pkg Aff:
Recorded L.A County Doc. # 84-1182551

VENICE BLVD
S FLOWER ST
ALLEY
S HOPE ST


1616
S. Flower
PUBLIC ALLEY
FWY
FLOWER
SANTA MONICA
18TH
LEBANON
SUBJECT SITE
400 FT


PRICE

Internet Document Imaging System

Result of Document Search by Address

Address: 1721 FLOWER

1. To print a summary overview, check mark the column for the desired record, then click here for printer friendly format.
2. To obtain the summary of the document, click on any of the result records below. (i.e. Document Type, ... Doc number).
3. To view the digital document, click on the digital icon ( )

Sort By: Doc Type / Ascending
Then By: Sub Type / Ascending
Then By: Doc Date / Ascending
Then By: Doc Number / Ascending
Sort

Pre-selected addresses:

All

All	Document Type	Sub Type	Doc Date	User Doc Number	Digital Image
	ADMINISTRATIVE APPROVAL	MISCELLANEOUS	8/8/1997		
	ADMINISTRATIVE APPROVAL	MISCELLANEOUS	10/9/1997		
	AFFIDAVIT	PARKING	10/1/1984	PKG 5267	
	BUILDING PERMIT	ALTERATION	2/10/1971	1971LA23768	
	BUILDING PERMIT	ALTERATION	10/2/1984	1984LA97342	
	BUILDING PERMIT	ALTERATION	8/15/1997	1997LA66562	
	BUILDING PERMIT	BLDG-ADDITION	5/24/1940	1940LA20460	
	BUILDING PERMIT	BLDG-ALTER/REPAIR	5/24/1940	1940LA20460	
	BUILDING PERMIT	BLDG-ALTER/REPAIR	2/24/1971	1971LA23768	
	BUILDING PERMIT	BLDG-ALTER/REPAIR	10/2/1984	1984LA97342	

Print

CITY LA DBS
DEPARTMENT OF BUILDING AND SAFETY

August 31, 2017

Document Report

Documents

Document Number(s)
PKG 5287

Record Description
Record ID: 1417938
Doc Type: AFFIDAVIT
Sub Type: PARKING
Doc Date: 10/01/1984
Status: ISSUED
Doc Version: None
AKA Address: None
Project Name: None
Disaster ID: None
Subject: None
Product Name: None
Manufacturer's Name: None
Expired Date: None
Receipt Number: None
Case Number: None
Scan Number: None
Dwelling Units: None
Comments: BUILDING LOCATED AT 1721 S. FLOWER ST. HAS PARKING LOCATED AT 1616 S. FLOWER ST.

Property Address(es)
1721 S FLOWER ST 90015-0000
1616 S FLOWER ST

Legal Description(s)
Tract: WRIGHT TRACT
Block: **Lot:** 15 **Arb:**
Map Reference: M R 10-32 **Modifier :** FR
Tract: TR 22198
Block: **Lot:** 1 **Arb:**
Map Reference: **Modifier:**

PIN(s)
124-5A205 141
124-5A205 56

Assessor Number(s)
5134-008-006
5126-010-008

Council District(s)
9

CITY LA DBS
DEPARTMENT OF BUILDING AND SAFETY

August 31, 2017

Document Report

Census Tracts(s)
2240.200

District Offices(s)
LA

Faramarz "Fred" Yadegar
Trustee, T.O.Y. Family Trust
1721 S. Flower Street
Los Angeles, CA 90015
(213) 268-5890 | sibelle.of.ca@gmail.com

June 9, 2025

City Planning Commission
City of Los Angeles
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012

Re: Appeal of Vesting Tentative Tract Map No. 82213-1A
Case No. VTT-82213-1A / ENV-2018-3337-SCEA

Dear Chair and Commissioners:

Note on PLUM Committee Record: Prior PLUM Committee materials mistakenly characterized by Director of City Planning my eight parking spaces as subject to a private lease. In fact, these stalls are secured by a **recorded Covenant and Agreement** (Instrument No. 84-1182551), granting perpetual rights. Moreover, my support for the Project has always been **conditioned** on preserving the sole driveway entrance at 1616 S. Flower, to protect my Certificate of Occupancy. This clarification should guide your review of the Appeal.

Below is a point-by-point reply—"Answers to Staff Findings"—responding to each Staff Finding in the Appeal Recommendation Report for VTT-82213-1A.

1. Staff Finding: Map-only approvals need not expressly recite private covenants.

My Reply:
Under California's Subdivision Map Act (§ 66474.9) and the Stipulated Judgment in LASC BC492202, the City **must** ensure tentative maps do not conflict with recorded covenants. By creating a single master ground lot, the Department effectively nullified Instrument 84-1182551. A condition requiring recordation of a new covenant preserving those eight spaces—with the same ingress at 1616 S. Flower—on the merged lot is mandatory.

---

2. Staff Finding: Eight off-site spaces still appear on the Site Plan, so the Judgment is satisfied.

My Reply:
Merely showing eight stalls in a large garage does **not** satisfy the Covenant or Judgment. Both require those stalls be accessed **only via the driveway at 1616 S. Flower and the public alley**. Moving the driveway to Hope Street blocks that route and violates "direct ingress/egress." Unless the 1616 Flower entrance remains, the Judgment is rendered meaningless.

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3. Staff Finding: LAMC 12.21.A.4(g) allows measuring "750 feet" from any point on the merged lot.

Code Excerpt:
"The automobile parking spaces required by Paragraphs (b), (c), (d) and (e) hereof, shall be provided either on the same lot as the use for which they are intended to serve or on another lot not more than 750 feet distant therefrom; said distance to be measured horizontally along the streets between the two lots; **except that where the parking area is located adjacent to an alley, public walk or private easement which is easily usable for pedestrian travel between the parking area and the use it is to serve, the 750-foot distance may be measured along said alley, walk or easement."**

My Reply:
LAMC 12.21.A.4(g) explicitly contemplates measuring along an alley when it is "easily usable." Here, the **only** easily usable pedestrian path is the public alley at 1616 S. Flower. Treating the merged boundary as the reference defeats the ordinance's intent to encourage safe alley connections. The Commission must require that all 750-foot measurements derive from the **single parcel** at 1616 Flower, via the existing alley.

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4. Staff Finding: Interim parking during construction will be provided on-site or on other applicant-owned parcels.

My Reply:
During demolition, **no** on-site garage exists. Relying on unnamed "other parcels" is speculative and does not guarantee eight equivalent spaces for 1721 Flower. The Settlement Agreement and Judgment require an **irrevocable**, recorded covenant on specific alternate parcels **within 2,000 feet before** any demolition starts. That recorded covenant must be a condition of any demolition/grading permit.

---

5. Staff Finding: PA-5's signage/attendant requirements from 2004 still apply.

My Reply:
PA-5 addressed a small dance hall in 2004—not a 23-story, 550-room hotel with 250 residences. To truly protect the covenant's eight spaces, they must be **physically segregated and gated**, with **key-fob or coded-card access**, and monitored **at all hours** by a dedicated attendant or valet. Generic "Reserved" signage in a 1,000-stall facility is insufficient.

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6. Staff Finding: No taking or due process violation because off-site parking still exists.

My Reply:
A regulatory taking occurs when a valid property right—here, direct alley access to covenant stalls—is functionally destroyed. Relocating that access to Hope Street forces users into a multi-level garage, across busy streets, and beyond 750 feet—effectively extinguishing the covenant. That is both a taking and a due process violation unless the historic alley entrance is fully preserved.

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7. Staff Finding: The City's only obligation under the Judgment is to remain neutral; private parties enforce covenants.

My Reply:
In reality, **the City**—through **LADBS** and **Deputy City Attorney Charles Sewell**—was integrally involved from the outset. The 2015 Settlement Agreement (¶ 3(a)) expressly records that counsel for both sides "working cooperatively" met with City officials (including Mr. Sewell) to secure a formal **City Approval** confirming that the eight-space Covenant would maintain 1721 Flower's Certificates of Occupancy. The City Attorney's Office explicitly reviewed and signed off on the Covenant's validity. Under **CCP § 664.6**, the City retained jurisdiction to enforce that Judgment and must ensure that no map or permit approval undermines it. Allowing VTT-82213 to proceed without preserving the 1616 Flower entrance places the City in contempt of its own court order.

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8. Staff Finding: The overall parking provided by the Project is inadequate and will negatively impact neighborhood parking.

Staff Response 8:
The Staff asserts the Project's 283 spaces (including the Appellant's eight) exceed the 241-space requirement after reductions, that robust transit service will substitute for

personal vehicles, and that the Downtown Community Plan envisions reduced parking minimums consistent with this supply.

Counterargument to Staff Response 8:

1. **Quantitative Shortfall vs. Actual Demand**
   • 250 residences + 300 hotel rooms (1.5 cars/room) + 13,120 sf retail generate demand for over **600 spaces**, not 283.
   • Full code requires 355 stalls; Project provides 283—a **72-stall deficit**. Even counting the eight covenant spaces, the neighborhood loses 64 guaranteed stalls, pushing spillover onto local streets.
2. **Covenant Rights vs. Transit Aspirations**
   • A **recorded covenant** and court-confirmed Judgment trump aspirational transit goals. Existing users still **rely** on street/garage parking—today, not in the future.
3. **Transit Doesn't Replace Hotel/Medical/Residential Parking**
   • **Luggage-laden hotel guests**, **medical visitors**, and **families** are unlikely to use transit first/last mile. Off-peak transit is sparse.
4. **Localized Spillover & Safety**
   • Narrow streets and curb restrictions and Metro line already strain traffic. Even a handful of circling cars causes congestion, blocks driveways, and impedes emergency access.
5. **Legal Hierarchy**
   • **Private rights** and **court orders** must be honored before policy goals. Nullifying covenant parking without compensation or relocation triggers takings and due process claims.

In sum, the City must **deny** any final map, permit, or CoO until it adopts and enforces **these conditions**:

1. Preserve the 1616 S. Flower entrance and adjacent alley as the sole access for the eight covenant stalls as has been since 1984.
2. Use the 1616 S. Flower parcel (not the new merged lot) for all 750-foot LAMC 12.21.A.4(g) measurements.
3. Record an interim off-site covenant for eight stalls within 2,000 feet before demolition.

4. Segregate and gate the eight stalls, with key-fob access and attendant monitoring **at all hours**.
5. Preserve the public alley—open, level, ADA-compliant—and maintain a clear path between 1721 and 1616 Flower.
6. Confirm the City's enforcement role—LADBS and City Attorney must verify covenant compliance before issuing any permits or CoOs.

Respectfully,

Faramarz "Fred" Yadegar
Trustee, T.O.Y. Family Trust

IRVINE
& ASSOCIATES, INC.

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EMAIL Info@IrvineAssoc.com
WEBSITE www.Irvineassoc.com

June 9, 2025

Los Angeles City Planning Commission
Los Angeles City Hall
200 North Spring Street, Room 272
Los Angeles, CA 90012
c/o Cecilia Lamas, Commission Executive Assistant II

SUBJECT: Response to Staff Reports for the proposed project at 1600 S Flower St; Case Numbers CPC-2018-3336-SN-TDR-CUB-SPR-MSC & VTT-82213-1A; Agenda Items 6 and 7 on the June 12, 2025, CPC Agenda

Dear Honorable City Planning Commissioners,

Irvine & Associates, Inc., represents Venice Hope Group, LLC (the "Applicant"), for the proposed mixed-use hotel and multi-family housing development project located at 1600-1618 S Flower St, 1601-1623 S Hope St, and 426-440 W Venice Blvd, known as “South Park Towers,” with the Subdivision Case Vesting Tentative Tract Map (“VTTM”) No. 82213 (“VTT-82213”). The VTTM was considered by the Advisory Agency and Subdivision Committee in a hearing on March 5, 2025, having been found to meet all City requirements and meeting all required Findings of approval. The Advisory Agency issued its Letter of Determination (“LOD”) on April 3, 2025, approving the VTTM. An appeal of the VTTM was filed by Faramarz Yadegar (“Appellant”) on April 14, 2025 (“Appeal”). The approved VTTM has a related case, CPC-2018-3336-SN-TDR-CUB-SPR-MSC (“CPC Case”), under consideration by the City Planning Commission (“CPC”).

This thoughtfully designed Project aligns with the City’s urgent need for housing and hotel guest rooms in the Downtown Los Angeles neighborhood of South Park, within walking distance to the Los Angeles Convention Center and multiple transit and bus lines. By adhering to the objectives of the Downtown Design Guide, the Project embodies a balanced approach to growth and sustainability in line with the City’s planning goals. The approved VTTM creates one master ground lot and subdivides the site into four airspace lots to allow the development of a high-density urban mixed-use project containing a maximum of 250 residential apartment units, a hotel with 300 guest rooms, and approximately 13,120 square feet of commercial space (including medical office and retail uses), along with a ground floor paseo.

We have reviewed the Appeal Staff Report (Agenda Item 6) and thank staff for its great work and thoroughness in preparing the report. We agree with Staff’s analysis and recommendation to deny the Appeal and provide the following additional comments.

The Appeal Staff Report thoroughly responds to all Appeal issues concerning claims of lack of compliance with the Covenant and Los Angeles Municipal Code regarding eight parking spaces for 1721 Flower St. As the Applicant has repeatedly told the Appellant, it has been and will continue to comply with the Covenant. As the Appeal Staff Report demonstrates, the Project Plans clearly make provision for the eight spaces on site. With respect to the issue of provision of availability of eight spaces off-site during project construction, the Applicant owns multiple properties within 2,000 feet of 1721 S Flower St that could serve as temporary

relocated parking during the construction period of South Park Towers. Thus, the eight parking spaces will be provided within 2,000 feet of 1721 S Flower St during construction.

Regarding the Staff Report for the CPC Case (Agenda Item 7), the project team requests a small change to the wording of Condition of Approval No. 32.e.

Condition 32.e.: As currently worded, Condition 32.e. states:

> **32. Paseo.** The Project shall provide a minimum 4,200 square-foot hardscaped and landscaped pedestrian paseo extending north-south through the middle of the Project Site, from Venice Boulevard to the alley, as shown in Exhibit A, May 29, 2025. The Paseo shall meet the following requirements:
>
> …
>
> e. At least 40 percent of the Paseo area shall be landscaped with planting.

However, the Downtown Design Guide provision, Section 7.D.1, from which this 40% requirement comes, requires projects requesting a reduction in open space to provide a Public Amenity Space that meets specific requirements, including 40% landscaping. The term "Public Amenity Space" is specifically defined on page 75 of the Downtown Design Guide and is separate from the entire Paseo. As such, the Applicant requests that the wording of Condition 32.e. be amended to read:

> e. At least 40 percent of the Public Amenity Space within the Paseo area shall be landscaped with planting.

Additionally, the Applicant requests two minor changes to the Sign District Ordinance under consideration, regarding Section 7's Standards for Specific Types of Signs, 7.A.5.d. and 7.B.5.

Section 7.A.5.d.: As currently worded, 7.A.5.d. states:

> d. No Digital Display shall be made operative until a Certificate of Occupancy has been issued for the building on which the Digital Display is located.

The Applicant requests that this provision be amended to read:

> d. No Digital Display shall be made operative until a Temporary or permanent Certificate of Occupancy has been issued for the building on which the Digital Display is located.

Section 7.B.5.: As currently worded, 7.B.5. states:

> **5. Operation.** No Supergraphic Sign shall be installed until a Certificate of Occupancy has been issued for the building on which the Supergraphic Sign is located.

The Applicant requests that this provision be amended to read:

> **5. Operation.** No Supergraphic Sign shall be installed until a Temporary or permanent Certificate of Occupancy has been issued for the building on which the Supergraphic SIgn is located.

Conclusion

The proposed project provides much needed housing, hotel rooms, and commercial space, with unique ground floor paseo and public amenities within the dynamic and growing South Park neighborhood of Downtown LA. Given the location in very close proximity to the Los Angeles Convention Center, the additional hotel rooms is supportive of the City's ongoing effort to strengthen use of the Convention Center. The project enjoys broad support from South Park and Downtown LA stakeholders. While making the most of nearby transit access, the project design provides adequate parking for all on-site uses as well as maintain the Appellant's eight covenanted spaces per the terms of the Covenant. Planning Department staff have analyzed the sufficiency of parking provision, and the Advisory Agency and Subdivision Committee have approved the Vesting Tentative Tract Map. We respectfully urge the City Planning Commission to approve the Project and deny the Appeal as recommended by Planning Staff and advance this transformative opportunity for Los Angeles.

Thank you for your consideration.

Sincerely,

Tanner Blackman
Irvine & Associates, Inc.

CC: Milena Zasadzien, Mindy Nguyen, & More Song, Dept. of City Planning
Kevin Ocubillo, Office of Councilmember Ysabel Jurado